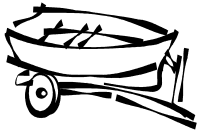




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SIP TIP: WORKING OVER WATER



OSHA Regulation 1926.106(d) states: "At least one lifesaving skiff (boat) shall be immediately available at locations where employees are working over or adjacent to water."

OSHA has issued several interpretation letters in recent years regarding the use of skiffs. For instance, Following are two discussions about skiffs. Please familiarize yourself with the provisions for emergency skiffs when your crews are working over water and insure that your operations are in compliance. Some OSHA Area Offices have indicated that they are seeing a rise in violations of this requirement.

The first question is: Would a skiff be required when fall protection is in place for employees working over water? OSHA replied as follows:

The requirement in §1926.106(d) for a skiff addresses the hazard of falls that may occur in the event of a failure of the operation of fall protection devices or a lapse in their use. Section 1926.106(d) states: At least one lifesaving skiff shall be immediately available at locations where employees are working over or adjacent to water. The intent of the paragraph is to ensure prompt rescue of employees that fall into the water, regardless of other precautions taken to prevent this from occurring. Thus, OSHA requires that employers supply a skiff to affect a prompt water rescue. Furthermore, OSHA deems "immediately available" as having first aid/ medical treatment to the victim within 5 minutes.

As a skiff supplies a backup to potential failures of fall protection devices, the use of fall protection systems is not a substitute for the skiff. Therefore, the failure to provide a skiff in these circumstances would be a violation of §1926.106(d).

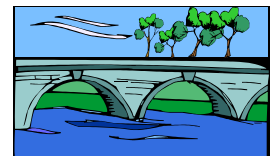
The 2nd question is: Is a skiff necessary when employees are working over water that is less than two feet deep? OSHA replied:

Title 29 CFR 1926.106(d) states: At least one lifesaving skiff shall be immediately available at locations where employees are working over or adjacent to water. This provision does not state a minimum depth of water required before a lifesaving skiff is necessary. Unlike §1926.106(a), this provision does not include the phrase "where the danger of drowning exists."

As discussed in the previous question, in certain circumstances, such as where the worker is at a height where a fall could cause significant injury or unconsciousness, drowning in shallow water can result. **The purpose of §1926.106(d) is to facilitate the rapid rescue of workers who fall into the water. Even in shallow water, a skiff will greatly reduce the amount of time it takes to reach an employee in the water (unless the employee is working in an area very near the water's edge).**

Of course, if the water were so shallow that rescuers could simply run in (and a skiff would foul on the bottom anyway), a skiff would not be required.

Other letters of interpretation state that a motor AND oars are required for all life saving skiffs.



REMINDER: A MOTOR AND OARS ARE BOTH REQUIRED!