

<b>SAFETY MESSAGE</b> <b>Topic: PFDs - #1</b>	<b>Deepwater Horizon (MC 252) Oil Spill</b>	<b>DATE PREPARED: 7/7/10</b> <b>TIME PREPARED: 1000</b>	<b>PAGE 1 OF 2</b>
<b>Wildlife Recovery &amp; Sensitive Lands Branch – Mobile, AL and Houma, LA; including Florida Peninsula Operations</b>		<b>OPERATIONAL PERIOD:</b> Current until rescinded by other guidance post this date	
<p>This safety message provides clarifying information regarding Personal Flotation Device (PFD) use by U.S. Fish &amp; Wildlife Service (Service) and Partner Agency (e.g., NPS, USDA-WS, etc.) personnel working within the DH MC 252 Oil Spill Wildlife Recovery and Sensitive Lands Branch. This message is provided to answer specific questions raised by Service and Partner Agency personnel regarding Branch requirements for PFDs. It does not address aviation related PFD use requirements.</p>			
<p>Service and Agency personnel must comply with their employer’s PFD policy requirements (e.g., 241 FW 1 for Service personnel, RM/DO #50B section 9 for NPS personnel, etc.) and adhere to any supplemental Branch PFD requirements established to mitigate site-specific water activity based hazards. One such supplemental requirement established in early May is the requirement that a U.S. Coast Guard (USCG) approved PFD must be donned by Branch personnel before boarding a watercraft. Thus, if you are assigned to participate in watercraft based operations and do not have an employer compliant USCG approved PFD, contact your spill supervisor and make arrangements with Operations/Logistics to acquire one. If assigned to a Vessel of Opportunity (VOO), use a VOO available Type III PFD in the interim or for the duration of the assignment, as long as it meets your Agency’s requirements. The answer to Question 8 provides a sample PFD type for logistical ordering purposes.</p>			
<p><b>Question 1: Are personnel required to wear a PFD while on-board Service, Partner Agency, BP VOO, or any other spill assigned watercraft?</b> Yes. Although there are some exceptions provided in USCG, DOI, Service, NPS, and State Agency regulations and policies, all personnel working aboard spill assigned watercraft are required to wear a PFD. Such exceptions are typically based on vessel class/size, location of personnel on vessel (e.g., on the deck), and at the discretion of the watercraft operator at other locations on the vessel. In regards to these exceptions, personnel must follow their agency’s watercraft/PFD policy requirements. Personnel on-board VOO watercraft must adhere to VOO requirements (e.g., wearing of a Type III PFD whenever the vessel is underway).</p>			
<p><b>Question 2: Are there any other specific times or activities when I need to wear a PFD?</b> Yes. Numerous water based activities are being conducted during our work on the spill and Branch personnel must mitigate the hazard of drowning by use of operational modifications and PFDs. One specific time/activity which requires PFD use is when personnel are wading in water to affect an animal capture. Another is when personnel disembark a watercraft and wade to shore to gain access to land for assessment/survey work. You and your spill supervisor must evaluate the hazards of any proposed work around, above, or in water to ensure that adequate hazard mitigation measures have been implemented. Assistance in evaluating hazards can be gained by contacting your Spill Safety Officer.</p>			
<p><b>Question 3: Is there a requirement for vessels to have a throwable PFD?</b> Yes. Any vessel 16 feet and longer (except canoes and kayaks) working the spill, must carry one throwable Type IV PFD at the ready for immediate use. The VOO operator must indicate the throwable PFD’s location during a safety briefing before you board.</p>			
<p><b>Question 4: Must a PFD be U.S. Coast Guard Approved?</b> Yes. Approved PFDs have an approval number typically provided on the inside shell fabric. All PFDs used on the spill must have the USCG approval.</p>			
<p><b>Question 5: Are there different types of PFDs?</b> Yes. There are five types of PFDs which provide one of three forms of flotation. The five types include 1) Type I Off-shore Life Jacket; 2) Type II Near-shore Buoyant Vest; 3) Type III Flotation Aid; 4) Type IV Throwable Device; and 5) Type V Special Use Devices. BP requires VOO operators to furnish Type III PFDs to VOO passengers presenting without a USCG approved Type III PFD.</p>			
<p><b>Question 6: Are there different sizes of PFDs and is it important to match the size to the wearer?</b> Yes. Many PFD types come in a range of sizes from small to XXXL. Depending upon the manufacturer (e.g., Stearns, Mustang Survival, etc.), the PFD may have side adjustments for dual sizing. Personnel who wear an undersized PFD tend to not wear the unit correctly (unzipped and unlatched) which could lead to displacement from the wearer when water entry is made. A PFD that is too large for the wearer may come off upon water entry.</p>			

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<p><b>Question 7: Where and how do I get a PFD when I've been assigned tasks involving watercraft operation or water hazards?</b> If you mobilized with a PFD meeting your agency's requirements then use that one. If you arrived without a PFD, you will either use a VOO Type III PFD (must be USCG approved and compliant with color and reflective tape requirements indicated in the answer to Question 8) or request a compliant one through your spill supervisor. All Branch provided PFDs shall meet the color and reflective tape requirements indicated in the answer to Question 8. Operations and Logistics must have various sizes available for distribution to field crew members.</p> <p><b>Question 8: Are there color or reflective tape requirements for PFDs?</b> Yes. Service and NPS personnel must wear PFDs of International Orange color with reflective "SOLAS" tape on the back and front in accordance with 46 CFR 25.25-15. Other Agency personnel should abide by their PFD color and reflective tape requirements. Branch provided PFDs must conform to the International Orange and reflective tape requirements.</p> <p><b>Question 9: What inherent buoyant PFD options are available to help counter heat stress issues related to wearing a PFD in summer temperatures?</b> Several PFD vendors offer partial mesh constructed inherent buoyant Type III units with large arm holes and mesh shoulders for cooling, ventilation, and comfort. Such PFDs are preferred over auto-inflatable versions since their safety factor does not rely upon an activating mechanism. Examples include: Stearns Deck Hand Life Vest (COLE 1624) and Mustang Survival Mesh Vest (MV1254 T1).</p> <p><b>Question 10: Are auto-inflatable PFDs an option?</b> An auto-inflatable PFD may only be used when the individual's employer has established procedures for authorizing its use and the employee has received such authorization. The mechanisms to ensure proper maintenance and training must be in place and practiced. <b>Note:</b> The Service only authorizes auto-inflating PFDs for use in special circumstances such as where there is evidence that using a conventional "inherently buoyant" PFD will increase the health and safety risks to the employee when compared to the auto-inflating PFD. The Service's Southeast Region has issued a limited number of authorizations to use auto-inflatable PFDs, primarily to law enforcement personnel only. Inherently buoyant PFDs, with the mesh design described in the answer to Question 8, are the preferred PFD type for this spill.</p> <p><b>Question 11: Is BP or Branch Operations/Logistics obligated to furnish an auto-inflatable PFD to a Branch employee assigned to watercraft operations who has an employer authorization for an auto-inflatable PFD when a mesh style Type III PFD is available?</b> No, unless it is required to mitigate a specific watercraft operations safety hazard.</p> <p><b>Question 12: Do I wear the PFD inside or outside of protective clothing (e.g., Tyvek suit, etc.)?</b> In almost all situations, the PFD should be worn outside of a Tyvek type suit. The reasons are varied but include 1) a PFD worn beneath a Tyvek type suit has a tendency to restrict the range of motion of the employee's upper extremities; 2) there is a greater likelihood to stress, stretch, and tear the suit even when extra sizes are used to provide more internal space for the PFD; 3) if used with an auto-inflatable PFD, it could encumber the full deployment of the unit. <b>Note: Wearing a PFD external of a Tyvek suit in a contaminated environment may require the PFD to be cleaned, decontaminated, or replaced.</b></p> <p><b>Directions to deployed Safety Officers: Distribute within each Sector's IAP and retain for future use/reference.</b></p>			
<b>Prepared by: Brian Hardison SOF2, R4 Spill Strike Team Safety Officer (404)376-3035</b>			