WORKING OVER OR NEAR WATER

Drowning Prevention, Safe Access and Planned Rescue

POLICY STANDARD	Plan the rescue before exposure begins. Employees exposed to drowning hazards must use required flotation and fall protection, have unobstructed lifesaving equipment and a rescue method capable of immediate response.

PHEIFER BROTHERS CONSTRUCTION CO., INC.

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USE OF THIS POLICY	This policy establishes minimum company expectations and is not all-inclusive. Project conditions, owner requirements, engineering plans, permits, manufacturer instructions or applicable fall-protection, marine, cofferdam and emergency-response rules may require additional controls.

Primary Regulatory References

- 29 CFR 1926.106 - Working over or near water
- 29 CFR 1926.605 - Marine operations and equipment
- 29 CFR 1926.802 - Cofferdams
- 29 CFR 1926 Subpart M - Fall Protection
- 29 CFR 1926.50 - Medical services and first aid

Official standards: www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.106, /1926.605 and /1926.802

1. Purpose, Scope and Responsibilities

Purpose and Scope

This policy protects employees working over, near, on or adjacent to water from falls, drowning, cold-water immersion, current, flooding, vessel traffic, entanglement and delayed rescue. It applies to bridges, piers, cofferdams, barges, floats, pontoons, pile driving, temporary trestles/platforms, docks, causeways, drainage structures and any location where an employee could fall or be swept into water. No minimum depth automatically eliminates a drowning hazard.

Management / Project Management

- Evaluate water hazards and provide required flotation, fall protection, access and rescue resources.
- Require a documented, project-specific water safety and rescue plan before exposure.
- Provide an immediately available lifesaving skiff/rescue boat and trained personnel where required.
- Coordinate with the controlling contractor, emergency responders and marine authorities.

Competent Person / Water-Safety Coordinator

- Assess depth, current, temperature, fall height, access, rescue time and changing conditions.
- Establish PFD, fall-protection, lifesaving-equipment and work limits.
- Inspect access and equipment; verify the rescue system is ready before each shift.
- Monitor weather and water conditions and stop work when rescue is doubtful.

Foremen and Employees

- Foremen review the plan, assign response roles, verify equipment and maintain accountability.
- Employees wear and inspect assigned protection, use designated access and report changes immediately.
- Every employee may stop work when protection, access, communication or rescue capability is inadequate.
- No employee may enter water for an unplanned rescue.

STOP-WORK AUTHORITY	Work resumes only after the hazard is corrected, the plan is reassessed and the foreman or competent person authorizes restart.

2. Project-Specific Water Safety and Rescue Plan

Required Before Exposure

- Identify exact work locations, access points, water edges and employees exposed by shift.
- Document depth, current, water/air temperature, fall height, ice, underwater debris, sheet piling, rebar, intakes, spillways and downstream hazards.
- Evaluate weather, lightning, wind, rainfall, snowmelt, river stage, dam releases, flooding and vessel traffic.
- Select fall protection, PFDs, ring-buoy locations, rescue boat/skiff, retrieval/recovery method, medical response and cold-exposure supplies.
- Identify the alarm, who calls 911, who maintains visual contact, who deploys flotation, who operates the boat and who meets responders.
- Establish communications, lighting, assembly/accountability, hospital/EMS access and coordination with other employers.

Rescue Feasibility

CONDITION	PLAN MUST ADDRESS
Fast current / downstream hazards	Upstream positioning, powered rescue, interception point and no-go limits.
Cold water	Short response time, suitable flotation/thermal protection, warming supplies and EMS.
High fall / unconscious casualty	Immediate flotation, recovery of a non-responsive person and compatible fall rescue.
Night / remote work	Illumination, redundant communication, responder access and trained coverage by shift.
Barge / cofferdam	Water-level changes, boarding/recovery ladder, multiple exits and flooding alarm.
Entanglement / debris	Avoidance, boat positioning and tools/methods that do not expose additional employees.

Review and Change Management

- Review at project start, each new work phase and when access, staffing, water, weather, equipment or rescue arrangements change.
- Brief affected employees before exposure and document significant revisions.
- Do not rely only on 911 or recreational boaters when OSHA/company rules require immediately available onsite rescue capability.

PLAN THE RECOVERY	A ring buoy or boat is not a complete plan. The crew must know how the employee will be located, reached, removed from the water and transferred to medical care.

3. Personal Flotation Devices

When Required

- Employees working over or near water where a drowning danger exists must be provided and must wear a properly fitted U.S. Coast Guard-approved life jacket or buoyant work vest.
- Employees on unguarded barge decks must wear approved work or buoyant vests.
- Wear the PFD fully fastened and adjusted whenever exposure exists, including transfers between boats, barges and structures.
- The competent person may document that a PFD is not needed only when continuous protection completely eliminates the possibility of entering the water; project rules may still require both.

Selection

- Select for body size/weight, current, cold water, fall height, expected rescue time, clothing, tools and the possibility of unconsciousness.
- Ensure compatibility with harnesses, connectors and planned rescue; neither device may impair the other.
- Use inherently buoyant PFDs for welding, burning, grinding, pile driving, demolition, rigging or sharp/abrasive work that could damage an inflatable device.
- Use an inflatable PFD only when Coast Guard-approved for the activity, authorized by the competent person and maintained per manufacturer instructions; never where heat, sparks, sharp objects, chemicals or failure to inflate are foreseeable.

Inspection and Care

- Inspect before and after each use as required by 1926.106(b).
- Check flotation, shell, seams, straps, buckles, zippers, approval label, contamination and unauthorized modification.
- For inflatables, inspect cylinder/cartridge, indicator, activation system, oral inflation and required service dates.
- Tag and remove any unit whose strength, buoyancy or function may be impaired.
- Clean, dry and store per manufacturer instructions; do not use PFDs as seats, kneeling pads or material protection.

PFD FIT	A loose, unfastened or incompatible PFD may come off or prevent recovery. Adjust it so it remains secure without restricting work or escape.

4. Fall Protection, Platforms and Openings

Separate Hazards, Separate Controls

- A PFD does not replace required fall protection. Evaluate fall and drowning hazards independently.
- Protect employees 6 feet or more above lower levels as required by the company Fall Protection Program and OSHA Subpart M, using guardrails, restraint, fall arrest or other permitted systems.
- Use both PFD and fall protection whenever an employee could still enter water, disconnect, transfer, work on an unguarded barge deck or be exposed during rescue.
- Confirm harness/PFD compatibility and plan prompt rescue for a suspended employee.

Platforms, Walkways and Temporary Bridges

- Design/support for expected loads and provide required guardrails and toe boards.
- Maintain stable, slip-resistant surfaces free of mud, ice, hoses and loose material.
- Provide safe, illuminated access and inspect before use and after impact, movement, flooding, wake or weather.
- Do not climb or sit on guardrails; do not bypass gates or protected access.
- Secure tools/materials where they could fall, strike persons below, damage rescue equipment or obstruct recovery.

Openings and Edges

- Cover, guard or continuously control openings for piles, material handling or access.
- Mark edges and access routes where darkness, glare, snow, fog or water makes them hard to identify.
- Coordinate guardrail removal with alternate protection, limited access and immediate restoration.
- Keep lifelines and lanyards clear of water, sharp steel, moving barges, cranes and pile-driving equipment.

BOTH MAY APPLY	Fall arrest reduces the chance of water entry; flotation helps after entry. One system does not automatically eliminate the other.

5. Ring Buoys, Rescue Boat and Rescue Personnel

Ring Buoys

- Provide ring buoys with at least 90 feet of line, readily available for rescue; spacing may not exceed 200 feet.
- Place visible, unobstructed units where they can be reached without entering the hazard and deployed with current/wind considered.
- Add units when piers, bends, barges or equipment block an effective throw/recovery path.
- Inspect each shift; keep line attached, free-running and stored for immediate deployment.
- Provide at least one Coast Guard-approved 30-inch lifering with at least 90 feet of line near each barge in use.

Immediately Available Lifesaving Skiff / Rescue Boat

- Provide at least one lifesaving skiff immediately available wherever employees work over or adjacent to water.
- Select a stable boat suitable for the current, distance, weather, debris and number of persons; use reliable powered propulsion where conditions require it.
- Position/launch it for prompt use with fuel/battery ready, clear access and no production load that delays rescue.
- Equip as the plan requires: PFDs, throwable flotation, reach pole/boat hook, lines, boarding/recovery device, first aid, thermal blankets, radio, lights, fire extinguisher and cutting tool.
- Inspect before the shift and after use or changed conditions.

Designated Operators and Rescuers

- Assign personnel before exposure; they may not have production duties that delay response.
- Train in boat operation, person-in-water recovery, currents, downstream hazards, cold-water care, first aid/CPR, communication and avoiding multiple victims.
- Use only planned, trained and equipped entry-rescue methods; no spontaneous swimming rescue.

IMMEDIATELY AVAILABLE	The rescue system must reach and recover a person within the time demanded by the actual current, temperature, distance and downstream hazards - not merely be somewhere on the project.

6. Person-in-Water and Cold-Water Response

Person-in-Water Actions

- Sound the alarm, notify the foreman and call 911 as the plan requires.
- Maintain continuous visual contact; point to the person and identify current/downstream movement.
- Throw flotation upstream or within reach without entering the hazard.
- Dispatch the designated boat/shore rescue team and warn of debris, vessels, electrical hazards and obstructions.
- Recover using the planned boarding, reach or retrieval method; avoid capsizing or creating another victim.
- Provide first aid, CPR/AED and cold-exposure care; arrange prompt medical evaluation.
- Account for the crew, report the incident and preserve the scene when appropriate.

Cold-Water Exposure

- Plan for cold shock, rapid loss of movement and hypothermia based on water temperature, wind, clothing and rescue time.
- Provide suitable flotation/thermal clothing, dry replacement clothing, blankets, warming equipment and shelter as conditions require.
- Handle recovered employees gently, remove wet clothing when safe, protect from further heat loss and monitor breathing/responsiveness.
- Do not rapidly heat extremities, give alcohol or assume a short immersion caused no harm.
- Request EMS/medical evaluation when cold-water immersion, aspiration, injury or hypothermia is possible.

Recovery of a Suspended or Injured Employee

- Coordinate fall rescue with water rescue; do not cut a lifeline until the person is supported and the action is directed by the plan.
- Plan for an unconscious or injured person who cannot grasp a line or climb a ladder.
- Keep rescue access clear for EMS and identify the best casualty transfer point.

REACH OR THROW - DO NOT GO	Unplanned entry can turn one emergency into multiple victims. Only trained, equipped and assigned rescuers may enter the water.

7. Barges, Boats, Floating Platforms and Access

Safe Access

- Where employees cannot step safely, provide a properly secured ramp, gangway or walkway of adequate strength.
- Accommodate water-level changes; provide needed handrails/guardrails, slip resistance, full-length illumination and clear passage.
- Vehicle ramps require adequate strength, sideboards, secure connections and traffic controls.
- Jacob's ladders must be double-rung or flat-tread, maintained and secured; use only when safer access is impractical.
- Maintain three-point control during boarding; do not jump between surfaces or carry loads that prevent safe contact.

Barge and Floating Work Surfaces

- Maintain decks in safe condition with clear passage around loads and unobstructed access to lifesaving equipment.
- Do not pass over/around deck loads without safe passage; provide fall protection at exposed deckload edges as required.
- Provide a portable/permanent ladder reaching from the top of the barge apron to the water unless equivalent equipment is at the pier.
- Secure floating equipment and account for wake, current, load changes and mooring failure.
- Keep rescue boat, ring buoys and recovery points clear of cranes, material and production work.

Boat Operation

- Only trained/authorized operators may operate company or project boats.
- Follow Coast Guard/state/local rules, capacity plate, manufacturer instructions and navigation-light requirements.
- Control ignition/fueling hazards, maintain communication and prohibit unsafe boarding, horseplay or riding on gunwales.
- Commercial diving is outside this policy and requires a separate compliant diving program.

ACCESS CHANGES	Ramps and gangways move as water levels and barge positions change. Reinspect and adjust them before use after any significant movement.

8. Cofferdams, Pile Driving, Cranes and Electrical Hazards

Cofferdams and Flooding

- Follow the Excavation, Trenching and Cofferdam Plan and the engineered design.
- Provide controlled flooding when overtopping by high water is possible.
- Develop and post an emergency evacuation signal.
- Provide guardrailed walkways, bridges or ramps with at least two rapid exits.
- Before entry, verify bracing/sheet piling, pumps and backup power, alarms, rescue equipment, water level/weather and atmospheric/confined-space controls.
- Evacuate for unexpected water rise, pump failure, boils/piping/soil loss, bracing movement, flood warning or alarm.

Pile Driving and Crane Operations

- Control suspended loads, swing radius, falling material, equipment/platform stability and noise-related communication failures.
- Position rescue equipment so cranes, barges, piles and deliveries cannot block deployment or recovery.
- Keep employees clear of suspended loads and secure loose equipment over water.
- Coordinate fall protection, PFDs and access so no item interferes with safe rigging or emergency removal.

Electrical Hazards

- Use required GFCI or applicable assured-equipment-grounding protections and equipment rated for wet conditions.
- Keep cords, plugs and connections out of water; inspect and protect them from weather, traffic and damage.
- Maintain required overhead-line clearance and use planned controls when cranes, ladders or long material are moved.
- Stop work, de-energize and prevent entry when electrical equipment may have energized water.
- Treat submerged or contacted electrical equipment as energized until a qualified person establishes otherwise.

EVACUATE EARLY	Do not wait for visible failure. Rising water, pump problems, soil loss or structural movement require immediate evacuation and competent-person reassessment.

9. Weather, Vessel Traffic and Night Work

Weather and Water Monitoring

- Monitor forecasts, lightning, wind, rainfall, snowmelt, river/lake/flood levels, current, ice, debris, visibility and upstream releases.
- Establish objective warning/action levels where practicable and identify who checks them and how often.
- Reassess after storms, rapid temperature changes, dam releases, ice movement or changes in work elevation/access.
- Stop when conditions exceed the plan or make reliable rescue doubtful.

Vessel and Recreational Traffic

- Coordinate with the owner and appropriate authority for navigable/recreational waterway controls.
- Use required signs, lights, buoys, markers and radio communications; monitor approaching vessels.
- Protect cofferdams, barges and work areas from vessel impact where practicable.
- Establish actions for wake, loss of mooring, vessel contact and intrusion into the work zone.
- Do not rely on recreational boaters to recognize construction hazards or provide rescue.

Night Work and Limited Visibility

- Illuminate work surfaces, edges, access, ring buoys, rescue boat, likely drift/recovery area and responder route.
- Aim lights to avoid glare that blinds operators, rescuers or workers.
- Provide required marine navigation lights and reflective/illuminated edge markings.
- Use reliable primary and backup communication; provide rescue-boat spotlight and high-visibility apparel consistent with the PPE Plan.
- Stop if lighting failure prevents safe work, visual tracking or recovery.

CHANGING WATER	Water hazards can change upstream and outside the work area. Monitoring must consider weather, releases, vessels and debris - not only conditions directly below the bridge.

10. Training, Inspections and Stop Work

Training and Drills

- Train exposed employees on PFD use/limitations, fall protection, ring-buoy deployment, alarm, communication, cold water, access, vessel traffic and stop-work conditions.
- Provide hands-on training for designated boat operators and rescuers.
- Conduct and document drills appropriate to the project before exposure and when conditions/crew/plan materially change.
- Verify alarm recognition, flotation deployment, boat response, communication, casualty recovery and first-aid readiness.
- Toolbox talks reinforce but do not replace required task, operator, rescue or regulatory training.

Required Inspections and Records

- Document the water-hazard/rescue assessment and significant revisions.
- Inspect PFDs before and after use; inspect ring buoys and rescue boat before the shift and after events affecting them.
- Document designated operators/rescuers, training/drills, emergency contacts, access/barge conditions and corrective actions.
- Maintain weather/water checks appropriate to project risk and record required action-level decisions.

Stop-Work Conditions

- Required PFD, fall protection, ring buoy, rescue boat/skiff, trained coverage or communication is missing/defective.
- Rescue equipment is blocked, cannot respond promptly or is unsuitable for current conditions.
- Access, guardrails, lighting, platforms or moorings are unsafe.
- Water rises/current increases, pumps fail, lightning/wind/fog/ice/debris or vessel traffic threatens the work.
- Electrical equipment may have energized water or conditions differ from the approved plan.

NO PRODUCTION OVERRIDE	Schedule, traffic closures or concrete operations do not override rescue readiness. If the planned protection or response is unavailable, exposed work stops.

11. Test Your Knowledge

Circle the best answer. Review missed questions with your foreman before working over or near water.

1. How much line must a required ring buoy have? A. 25 feet B. At least 90 feet C. 50 feet	2. What is the maximum spacing between ring buoys? A. 100 feet B. 300 feet C. 200 feet
3. When must a PFD be inspected? A. Before and after each use B. Monthly C. Only after immersion	4. Does a PFD replace required fall protection? A. Yes B. No - each hazard is evaluated separately C. Only above 6 feet
5. Who may make a water-entry rescue? A. Any nearby employee B. The strongest swimmer C. Trained, equipped and assigned rescuers using the plan	6. What must be immediately available at over-water work? A. A lifesaving skiff/rescue boat B. A pickup truck C. A recreational boater
7. What is required near each barge in use? A. Any rope B. A Coast Guard-approved 30-inch lifering with at least 90 feet of line C. A traffic cone	8. How many rapid exits must a cofferdam have? A. At least two B. One C. Four
9. What should happen if rescue equipment is blocked? A. Work continues briefly B. Employees rely on 911 C. Exposed work stops until rescue readiness is restored	10. What should a worker do first after a person enters water? A. Jump in B. Sound the alarm and follow the planned response C. Finish the lift

EMPLOYEE: _____ DATE: _____

ANSWER KEY: 1-B | 2-C | 3-A | 4-B | 5-C | 6-A | 7-B | 8-A | 9-C | 10-B