Fleet *Memorandum*

Please print and post at your vessel/ facility for all employees to view

Fleet Memo #25: Clarification of Hot Work

Background:

Many Party Chiefs, Captains and ABs have asked whether or not they needed to fill out a permit for a specific task, unsure if it qualified as hot work or not. Specifically, is using a grinder considered hot work? What if I'm working on the deck and nothing flammable is nearby? Do I need a permit if I'm working in the shop?

The Virginia Ship Repair Association wrote to OSHA asking a similar question about grinding aluminum in the ship yard. OSHA wrote a letter of interpretation in response which can be summarized in this paragraph from the letter:

> "OSHA does not define hot work based on specific types of materials or processes due to the endless possible combinations thereof. Hot work is defined in 29 CFR 1915.4(r) as "riveting, welding, burning, or other fire or spark producing operations." Thus, regardless of the type of material being ground, if fire or sparks are produced under any of the conditions specified in 1915.504(b), then a fire watch is required to be posted. Conversely, if no fire or sparks are produced, then the operation is not considered hot work, and a fire watch is not required. "

Hot Work Summary:

- All flame/spark producing activities are considered hot work.

- All hot work requires a paper permit and NS5 entry.

- The permit includes an integrated Job Safety Analysis which must be completed before the permit can be signed. No need to be elaborate -- short and to the point.

- The permit may only be authorized/ signed by the Engineer or Port Engineer.

- Detailed procedures are described in SOP-GEN-007J.

- Complete letter of interpretation may be found at:
  http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=INTERPRETATIONS&p_id=27413

Management understands that completing the JSA and permit is time consuming and may take longer than the actual task, but the policy is designed for your protection.   We expect ALL employees to help reinforce permit procedures and safe practices.