

# MEMO

## ODFW Safety & Health



**To:** ELT/RMT

**From:** Jerry Cotter, Safety & Health Manager, Oregon Department of Fish & Wildlife

**Date:** 6/19/2012

A recent complaint to Oregon–OSHA (OR-OSHA) concerning safety issues with rotary screw fish traps has uncovered various safety issues with the fish trap units. OR-OSHA has expanded their investigation statewide requesting information on the locations of our deployed traps and storage areas. Many of these issues were assumed to have been resolved in 2006 when a safety review was completed on all the fish traps. Failure to correct an identified hazard can result in large fines being assessed by OR-OSHA from \$250 to \$7,000 a day. Repeat violations can have a multiplier applied. Willful violations can range from \$5,000 to \$70,000 for each violation.

Issues found so far by OR-OSHA include:

- Lack of development and use of Job Hazard Analyses specific to the locations of deployed traps
- Non-use of the developed rotary checklist forms that were created in 2006
- Improper or missing guard rails
- Missing chains over guardrail openings
- Lack of safety signage
- Lack of guards over the base of the cones where they enter the fish well
- Lack of guarding over the rotating end that appears in fish well
- Lack of emergency plans specific to the location
- Lack of emergency equipment at the trap itself (throw rings)

If a fish trap is already deployed in the field, ODFW staff must inspect the trap to make sure that the items below are in place. The trap can't be operated until these items are in place.

- All guardrails and chains are present before operating the trap.
- Safety guards protecting the rotating shaft of the cone are installed and in place before operating the trap.
- The rotating shaft of the cone that protrudes into the fish well must be covered in a fashion that clothing and appendages cannot become tangled. The guard should encapsulate the rotating shaft including the end.

Before ODFW rotary traps are deployed the following items must be completed and communicated to employees operating the traps:

- A Job Hazard Analysis for each location and trap must be developed and communicated to staff before the trap is placed in service.

- A checklist (attached) must be used for each fish trap unit when it is deployed and during operations. The checklists must be retained by the project manager for at least 3 years on every trap that is deployed and for each deployment.
- Emergency plans for each location must be developed for each trap deployed. Example is attached.
- All guardrails and chains must be present before operating the trap.
- Safety guards protecting the rotating shaft of the cone must be installed and in place before operating the trap.
- The rotating shaft of the cone that protrudes into the fish well must be covered in a fashion that clothing and appendages cannot become tangled. The guard should encapsulate the rotating shaft including the end.

These conditions applies to any traps ODFW operates regardless of who owns the rotary trap, for example traps owned by tribal entities but operated by ODFW employees.

I am available for consultation at (503) 947-6062 and (503) 930-3350. Please disseminate this information to your District Fish Biologists and Project Leaders who work with fish traps.