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STATEMENT OF RADM J. P. STEWART
CHIEF OF STAFF, U. S. COAST GUARD
BEFORE THE EDUCATION AND LABOR SUBCOMMITTEE
ON HEALTH AND SAFETY

Mr. Chairman, distinguished members of the subcommittee:

I appreciate the opportunity to appear before you and discuss the Coast Guard's Safety and Occupational Health Program. We are proud of our program. Even though elements of the program are not yet fully developed, I am confident we are headed in the right direction. We are making significant progress toward implementing the OSHA statutes designed to protect the health and safety of our people.

The Coast Guard has a long tradition of saving lives. We earned our nickname of "The Lifesavers" by sending our people out in extreme conditions to assist those in peril. Since saving the lives of others is our main business, a concern for the safety and occupational health of our own personnel comes naturally to us.

The Coast Guard is a multi-mission organization. While search and rescue is our most urgent task, we are also busy with pollution control, drug enforcement, maintenance of aids to navigation, merchant marine safety, port security and military readiness. All of these endeavors benefit from our comprehensive safety and occupational health program.

It's my job and the job of my Headquarters staff to direct that program. The Coast Guard is essentially an operational rather than administrative service. Over 75 percent of all Coast Guard missions require that our people work in dangerous environments and they depend on safe operation for success.

When President Ford signed Executive Order 11807 requiring Federal agencies to establish safety and health programs consistent with the Occupational Safety and Health Act of 1970 (OSH Act), we carefully examined the mandate and the requirements it imposed. But we also looked beyond those requirements toward the development of a safety and occupational health program that would not only provide protection for our personnel, equipment and facilities, but would be a key part of our operation. We wanted safety to be our normal way of doing business, not some special effort.

Therefore, in 1974 we began to revise our existing program in order to make it more comprehensive. The Commandant wanted us to develop a full program that would meet the requirements and intent of the OSHA regulations, the Executive Order and Congress. Thus, the basic thrust of our effort is to meet the requirements of 29 CFR 1960, as we develop a safety and occupational health program that is completely integrated with, and particularly appropriate to, Coast Guard operations.

We approached the Department of Transportation and the Department of Labor with this idea in mind. Both agreed to let us tailor our program to meet our specific needs. This has made it possible for us to develop some innovative approaches to safety and health programming. But we haven't just been developing new safety programs; we have been changing the way the Coast Guard operates.

As the Chief of Staff, I am the Designated Safety and Health Official of the Coast Guard. While this is in keeping with the requirements of the Executive Order and 29 CFR 1960, there are other significant reasons why this role has been established. I have the authority and the responsibility to oversee all the activities of the Coast Guard and to allocate resources to maintain and improve our ability to accomplish our missions. Thus, I am in an excellent position to make sure that the safety and occupational health of our personnel is protected.

I'm pleased to say that I have a dedicated and highly competent staff in the Safety Programs Division which handles the day-to-day operation of our program at Headquarters. In the field, we have people with responsibility for the implementation of the program at each of our twelve Coast Guard Districts and fifteen Headquarters Units.

Our Safety and Occupational Health Program dovetails with our operational procedures. I'd like, now, to explain how that works in the Coast Guard and give you a brief description of our overall program.

PROGRAM OVERVIEW

We have based our program on the guidelines set forth in 29 CFR 1960. We have recognized our responsibility for providing safe and healthful places of employment and, in the case of many military personnel, residence; we have accepted, and will continue to rely on, the mandate imposed by 29 CFR 1960, subpart A. To meet the record keeping and reporting requirements of subpart B, we are assisting the Department of Transportation in developing, as an eventual replacement for the DOT Safety Management Information System, a data base management system that will do two important things. First, it will enable us to quickly and accurately review the comprehensive Coast Guard safety and health record. This will make it easier to fulfill the periodic reporting requirements set for us by the Department of Labor. Second, we will be able to use intelligent terminals in each of our district offices. This means we will get our information from the field quickly and will also eliminate a 12-page accident report form. In response to 29 CFR 1960, subpart C, not only is top management involved by the appointment of the Chief of Staff, as designated safety and health official, but we have active safety and health committees at the Headquarters, district and unit levels, as appropriate. Subpart D sets forth requirements for inspections and abatements and we feel we have

made real progress toward meeting those requirements with our comprehensive Headquarters evaluations and the 860 inspections performed in the field by our district safety and health managers during CY 1978. The hazard abatement requirements are dealt with by our Safety and Health Hazard Abatement Data System or SHHADS. Through SHHADS, 1,469 hazards were identified in the Coast Guard in 1978. These are monitored from the moment they are reported until they are abated. In 1978, 631 hazard abatements were documented under the SHHADS system. Our field personnel provide the information and my Headquarters staff manages that data and monitors the field's abatement efforts throughout the Coast Guard.

To meet the requirements of subpart E, we have adopted, as interim standards, 29 CFR 1910, 1914-1918 and 1926, the "OSHA Standards," which have been reprinted and distributed under distinctive red, white and blue Coast Guard covers. These volumes will be superseded by the Coast Guard Safety and Occupational Health Standards, which are currently under development.

We have set three program objectives to help us carry out our intentions. First, we seek to minimize the introduction of safety and occupational health hazards into Coast Guard operations. Second, we are determined to conserve the Coast Guard's manpower and material resources and protect them from existing hazards. Third, we are working to improve the ability of the Coast Guard's Safety and Occupational Health

Program to respond to emergencies in the field. We are meeting this last objective through such traditional activities as inspections, hazard abatement, and accident investigation. By focusing our attention on these preventive, active and reactive efforts, we hope to avoid the trap of thinking of safety and occupational health only as a police function. Many of the activities in our program aren't even identified as "safety." We view the proper performance of our safety and occupational health responsibilities as synonymous with good management and I regard the safety and occupational health staff, both at Headquarters and in the field, as a vital part of the Coast Guard management team. Their training and experience make it possible for them to call to my attention, and to the attention of District Commanders, conditions that might cause problems - problems that could limit our ability to operate - and problems that jeopardize the safety and health of our personnel.

STAFFING AND ORGANIZATION - HEADQUARTERS

Since 1973, we have not only increased the expertise of our Headquarters staff, we have expanded our field capability to respond immediately to safety and occupational health needs. In 1973, the scope of the Coast Guard's safety program was such that a Headquarters staff of five was adequate. Since that time, as the program has become more

comprehensive, increased specialization has been necessary. This specialization has been achieved by expanding the capabilities of the original staff through training, and through the authorization of additional personnel in different disciplines. Our staff now includes individuals with backgrounds in vessel, aviation and shore facility safety; industrial hygiene; fire prevention, protection and suppression; training; planning, programming and budgeting; and information services. We have organized the Safety Programs Division along the Coast Guard's operational lines. To that end, our safety staff is made up of both Coast Guard military people with "hands-on" operational experience who are now gaining expertise in service-wide safety management, as well as civilian safety specialists who are now becoming experts on Coast Guard operations.

We are providing significant career training for our safety professionals, both military and civilian. Our people in Headquarters and the field have attended, among other things, the Air Force's Ground Safety School at Arizona State University, various National Safety Council courses, NIOSH and OSHA Institute courses, safety courses for crane operators, University of Southern California Masters degree program in safety and health, and Navy vessel safety courses.

Our Safety Programs Division specialists are involved in the activities of other Coast Guard programs, both operational and support,

to coordinate the proper Coast Guard-wide implementation of the safety and occupational health program. Safety Programs people also provide assistance to the safety and occupational health personnel in the field, who are responsible for implementing the safety and occupational health program in day-to-day operations.

STAFFING AND ORGANIZATION - FIELD

Most of the expansion made necessary by the OSH Act, Executive Order 11807 and our own comprehensive program has occurred in the field. In the field, we now have 15 professional safety and health managers, one in each district, and one each at the Support Center, Governor's Island, at the Coast Guard Yard, at the Aviation Training Center, Mobile and at the Aircraft Repair and Supply Center, Elizabeth City, NC, as well as fully trained flight safety officers at each of our 26 Air Stations. Our most important addition to field staffing came in 1977 when we reprogrammed existing resources so that we could assign 12 Chief Damage Controlmen to the District Safety staffs. We augmented the already extensive experience of these Coast Guard veterans by providing many of them with an intensive 40-hour OSHA school and experience with the Navy's excellent ship safety survey teams, as well as other selected courses. Without this increased capability in the field, the specialization developed at Headquarters would have had little real impact on the safety and occupational health of the Coast Guard. Since

several districts have grown to over 150 units, the need for greater field capability was clear. The District safety and occupational health programs are funded in great part through the Chief of Staff, and thus those field personnel are clearly identified as part of my management team.

Our goal, from the first, has been to establish a comprehensive program, one that will work for all Coast Guard people, under all circumstances. We have made important progress in establishing the sort of program that will satisfy the requirements set down by the Congress in 1970, as well as providing truly effective safety and occupational health protection for the U. S. Coast Guard.

Thank you, Mr. Chairman. This concludes my prepared statement. I would be pleased to answer any questions that you have.