

Oil and Gas Extraction Sites: OSHA Hazard Alert Addressing Manual Tank Gauging/Sampling

Arkansas Environmental, Energy, and Water Law Blog



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The National Institute for Occupational Safety and Health (“NIOSH”) and the Occupational Safety and Health Administration (collectively “OSHA”) issued a “Hazard Alert” titled *Health and Safety Risks for Workers Involved in Manual Tank Gauging and Sampling at Oil and Gas Extraction Sites* (“Alert”).

Hazard Alerts are issued to warn employers about specific industry hazards and worker protection measures OSHA has identified.

OSHA states it has identified health and safety risks to workers who manually gauge or sample fluids on production and flowback tanks from exposure to hydrocarbon gases and vapors, exposure to oxygen-deficient atmospheres and the potential of fires and explosion.

The *Alert* notes in part that such issues can occur when workers:

... open tank hatches to manually gauge or collect fluid samples on production, flowback, or other tanks (e.g., drip pots (that contain processed fluids). Opening tank hatches, often referred to as “theft hatches,” could result in the release of high concentrations of hydrocarbon gases and vapors.

The *Alert* discusses:

- Hydrocarbon gas and vapor release from production and flowback tanks
- Health hazards of hydrocarbon gases and vapors
- Factors that may increase worker exposure to hydrocarbon gases and vapors in flammable atmospheres
- Factors that may decrease worker exposure to hydrocarbon gases and vapors in flammable atmospheres
- Worker fatalities during manual tank gauging and fluid sample collection, 2010-2014
- NIOSH evaluation of worker exposures during flowback and production activities
- OSHA evaluation of exposure to workers during tank gauging
- Appropriate respiratory protection
- NIOSH & OSHA recommendations for manual tank gauging and fluid sample collection

[Click here to download a copy of the Alert.](#)