

December 29, 1971

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Coast Steering Committee  
Pacific Maritime Association  
635 Sacramento Street  
San Francisco, California 94119

Gentlemen:

Re: Subcommittee - Training and Accident Prevention

Following approval of the Subcommittee's recommendations filed in its report of October 26, 1971, the Subcommittee took up the matter of implementation. Under the Committee's guidance, those procedures are set forth in the attached reports prepared by the Training and Accident Prevention Department Staff.

The impact of increased controls on the industry through Federal Regulations (OSHA) demands all corrective effort possible. If by "in-house" adjustment of the clerical work-load more time can be spent on ship inspections, the more positive will be Staff's contribution to the industry. This need is obvious from the fact that in the first six months of 1971 only 29.5% of member or member represented vessels were surveyed.

Computer programing runouts have already been tested and give a firm indication that central statistical accumulation and comparison will be timely and beneficial to the membership.

Setting up the Training and Accident Prevention Department as a clearing house for OSHA matters, the Committee is convinced, will develop a consistency that will control and, hopefully, eliminate the financial burden of fines and liability now being assessed against the industry.

Sub-Committee - Training and Accident Prevention

H. B. Copsey  
H. J. Riley  
F. R. Smith

HBC:jeh

Enclosures

**PACIFIC MARITIME ASSOCIATION** - Inter/intra Office Memo

December 27, 1971

TO: Coast Steering Committee

FROM: Training and Accident Prevention Department

SUBJECT: SUBCOMMITTEE - TRAINING AND ACCIDENT PREVENTION

On December 2, 1971 the Subcommittee met to discuss implementation of the recommendations set forth in its October 26, 1971 report to the Coast Steering Committee.

This report will cover how these recommendations will be acted upon, and will discuss each point as set forth in the Subcommittee's report of October 26, 1971.

1. VESSEL INSPECTION

Accident Prevention surveys will be stepped up to the maximum extent possible with this function becoming the prime goal of PMA Area Training and Accident Prevention staff. Surveys are being performed in such a manner as to report vessel and other discrepancies in anticipation of inspections by Federal Compliance Officers. Discrepancies will be reported to supervisory personnel on the job and in writing to the vessel owner or agent as well as to the stevedore company.

The Subcommittee calls for inspection of 100% of vessels in port. Every attempt will be made to comply with this request, with inspections as tough as those expected from the government. Should travel time, time aboard vessel, reporting and coding of accidents, etc., preclude this accomplishment, the Coast Steering Committee will be so advised. In such a situation the Subcommittee has recommended that office clerical staff be increased to take over as much of the reporting of discrepancies and the coding of accidents as possible.

2. STATISTICS

Statistics compiled by PMA serve several functions:

- a) They provide source material necessary to pinpoint problems that need to be corrected.

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- b) They provide a source of comparison for evaluation of company, area, coast, industry and national programs. A reduction in accidents, properly documented, is the route to getting the industry out of the "target" classification.
- c) They provide the information, required by law, to be supplied to: Federal agencies; the States of Washington, Oregon and California; and to the National Safety Council.

The new Occupational Safety and Health Act demands detailed information concerning both health and safety conditions. This information is required to be timely and specific. Thus the reports that PMA makes for members must be supported by timely and specific information from Member Companies.

The Subcommittee further recommends that statistical reporting, other than the original accident report (source document), be accomplished by PMA. PMA has asked for a variance in the law to accomplish this and has been assured by Federal Officers that it will be allowed. In the meantime, programming has been worked out so as to handle these requirements.

### 3. OCCUPATIONAL SAFETY AND HEALTH ACT LIABILITY

The Training and Accident Prevention Department will act as a clearing house for all matters respecting OSHA through:

- a) Liaison with pertinent government agencies.
- b) Screening of applicable laws, both proposed and in effect.
- c) Dissemination of information to Member Companies regarding a) and b).
- d) Keeping Members advised of government actions versus other Member Companies so that they may be forewarned as well as advised as to suggested action in case of citation.
- c) Legal responsibility and liability. (See separate report.)

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The Department is currently surveying every Member Company as to what sources of information they may be subscribing, with a view toward consolidation, standardization and minimizing cost.

4. In accordance with a further recommendation by the Subcommittee the Training and Accident Prevention Department welcomes the opportunity to make monthly verbal progress reports to the Coast Steering Committee.

*D.W. White*

cc: Messrs. Harlan B. Copsey  
Herbert J. Riley  
Fred R. Smith  
Ben H. Goodenough  
C. J. Myers  
Ralph R. Holtgrave

**PACIFIC MARITIME ASSOCIATION** - Inter/Intra Office Memo

December 27, 1971

To: Coast Steering Committee

From: Training and Accident Prevention Department

Subj: Sub-Committee Training and Accident Prevention  
Recommendations re Legal Assistance

The Sub-Committee has recommended that firms of attorneys be retained at PMA expense, in each of the four geographical areas. These firms would pursue such action as is considered necessary in answer to OSHA citations.

These firms are as follows:

Washington Area:

Bogle, Gates, Dobrin, Wakefield and Long  
14th Floor Phone: 682-5151  
Norton Building  
Seattle, Washington 98104

Oregon Area:

Lindsay, Nahstoll, Hart, Duncan, Dafoe and Krause  
Loyalty Building Phone: 226-1191  
Portland, Oregon 97204

Northern California Area:

Lillick, McHose, Wheat, Adams and Charles  
311 California Street Phone: 421-4600  
San Francisco, California 94104

Southern California Area:

Gibson, Dunn and Crutcher  
634 South Spring Street Phone: 620-9300  
Los Angeles, California 90014

The Sub-Committee has further recommended that the PMA Training and Accident Prevention Department act as a clearing house for information concerning the success or failure of member company citation appeals. The point here is that past experience would tend to indicate whether to appeal or not.

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The Training and Accident Prevention Department understands that the matter of legal assistance on the part of PMA is under consideration by the PMA Executive Committee.

*E. W. Chilton*

cc: Copsey  
Riley  
Smith  
Goodenough  
Myers  
Holtgrave