

- 5) Diphenhydramine (such as Bendryl) greater than 50 mg
- d) All dermally applied steroid applications. Exceptions: Hydrocortisone preparations in strengths of 1 percent or less
- e) All vaccinations used for work-related exposure. Exceptions: Tetanus
- f) All narcotic analgesics
- g) All bronchodilators. Exceptions: Epinephrine aerosol 5.5 mg/ml or less
- h) All muscle relaxants (e.g., benzodiazepines, methocarbamol, and cyclobenzaprine)
- i) Recordability of injections is based on the classification of the medication involved.
- j) To establish a medication baseline, the use of medications not listed above that legally require a prescription for purchase or use in the United States whether or not they require a prescription in the local country are recordable. Exception: Medication used for the sole purpose of diagnosis (e.g. dilating or numbing an eye for exam purposes only) is not considered medical treatment.
- k) Medications available in prescription and non-prescription form, the use of or a recommendation by a physician or other licensed health care professional to use a non-prescription medication at prescription strength is considered medical treatment for recordkeeping purposes.

4.2.5.2 For verification purposes the following website should be consulted. To use this site enter the name of the drug in the window. A brief description should come up. Click on the name and it will state either over the counter or prescription. If a medication's brand name cannot be found in the FDA website, participating companies should attempt to cross reference the medication's chemical name or if not found, use the classification of the local country.

<http://www.accessdata.fda.gov/scripts/cder/drugsatfda>

4.2.6 Recordable Incident (Injury or Illness):

Regardless of where signs or symptoms surface, a case is recordable only if a work event or exposure is a discernible cause of the injury or illness or of a significant aggravation to a pre-existing condition.

An injury or illness that is work-related and results in one of the following:

- a) Fatality (FTL)
- b) Lost time from work (LTI) (DAFWC)
- c) Restricted work / transfer activity (RWTC)
- d) Medical treatment other than first aid (MTO)
- e) DART: Days Away, Restricted or Transfer Case

Injuries or illnesses should not be evaluated on the time spent seeking medical treatment or undergoing evaluation. If an examination reveals that no medical treatment is required, and / or the case is not diagnosed as significant by the treating physician or licensed health care professional, the case is not recordable.

A person who sustains a work-related injury or illness requiring treatment that meets recordable incident criteria, and is terminated for drug use based on a post-incident drug test, the incident is recordable.

4.2.7 Significant Incident:

A significant diagnosed work-related injury or illness that is recordable under the general criteria even if it does not result in death, days away from work, restricted

work or job transfer, or medical treatment beyond first aid. The following incidents would be recordable, even if no medical treatment was given: Note: For record keeping purposes, these incidents are to be classified as "Medical Treatment" unless they result in death, days away from work, days of restricted work, or job transfer.

- a) Work-Related Cancer;
- b) Work-Related chronic irreversible disease;
- c) Positive x-ray diagnosis of fractures cracked or broken bones, etc. regardless of type of treatment given. This includes chipped, broken or cracked tooth/teeth;
- d) Punctured ear drum;
- e) Loss of consciousness;

4.2.8 The following incidents would be recordable, but the type of Recordable Incident will depend on the severity of the injury or illness:

- a) Any work related injury or illness requiring medical care or treatment beyond First Aid (regardless of the provider of such treatment);
- b) Any first, second, or third degree burn that results in one or more outcomes such as medical treatment, work restrictions, or days away from work;
- c) Removal of foreign bodies embedded in the body, including the eyes;
- d) Admission to hospital or equivalent medical facility for medical care or treatment beyond First Aid **treatment**;
- e) Needle sticks and 'sharps injuries' – Record all needle stick and injuries that result from sharps contaminated with another person's blood or other potentially infectious material;
- f) Wound closing devices such as sutures, staples, surgical glue used to **close a wound**,
- g) Massage treatment given by a Physical Therapist or Chiropractor;
- h) Intravenous administration of fluids to treat work-related stress;
- i) Administration of one dose of prescription medication for treatment of the injury or illness.
- j) Use of non-prescription medication (over the counter medication) at prescription strength for treatment of the injury or illness.

4.2.9 Restricted Work/Transfer Case (RWTC):

A Restricted Work/Transfer Case (RWTC) occurs when an employee cannot perform all of the routine job functions, but does not result in days away from work. A RWTC occurs when, as a consequence of a work related injury or illness:

- a) The employee is temporarily assigned to another job;
- b) The employee cannot perform all of his routine job functions for all or part of his work shift;
- c) The employee works his regularly assigned job but cannot work the full shift/tour.
- d) Restricted or light duty the day of the injury or illness does not make the incident a recordable Restricted Work / Transfer Case (RWTC). If the employee continues under restricted duty the day after the incident, the case becomes a recordable Restricted Work/Transfer Case (RWTC).

Should an employee experience minor musculoskeletal discomfort such as muscle pains or strains, a physician or licensed health care professional determines that the

employee is fully able to perform all of his routine job functions, and the employer assigns work restriction to that employee or restricts the employee's job functions, for purpose of preventing a more serious condition from developing, the case is not recordable as a restricted work case.

4.3 **Illness:**

A work related illness is one that is determined by a physician or licensed health care professional to have resulted from exposure to factors related to the employee's occupation and meets general recording criteria. For example: hydrogen sulfide poisoning, welder exposed to fumes created from heating galvanized material, exposure to workplace chemicals, heat stress, heat exhaustion, heat stroke, sun stroke, frostbite, etc.

4.4 **Lost Time Incident Experience:**

The period of time since the last lost-time incident that occurred on the Rig. If the Rig has operated for 365 days since the last lost-time incident, it is eligible to receive Rig recognition provided the other eligibility criteria for recognition have been met.

4.5 **Rate Calculations:**

Rates can be calculated two ways: Frequency Rate, which is incidents per 1,000,000 man-hours worked or Incidence Rate, which is incidents per 200,000 man-hours worked. The two numbers are essentially the same, except Frequency Rate is five (5) times the Incidence Rate.

4.5.1 **Frequency Rate:**

The Lost Time Incident (LTI) (DAFWC) Frequency Rate is calculated using this formula:

[Number of Lost Time Incidents (LTI) including Fatalities (FTL) multiplied by 1,000,000 and then divided by Total Hours Worked = Lost Time Frequency Rate]

To calculate the total recordable frequency rate (TRFR), use all recordable incident data [(MTO+RWTC+LTI+FTL) multiplied by 1,000,000 then divided by Total Hours Worked = Recordable Frequency Rate].

4.5.2 **Incidence Rate:**

The Lost Time Incidence rate is calculated using this formula:

[Number of Lost Time Incidents (LTI) including Fatalities (FTL) multiplied by 200,000 and then divided by Total Hours Worked = Lost-Time Incidence Rate].

To calculate the total recordable incidence rate (TRIR), use recordable incident data

[(MTO+RWTC+LTI+FTL) multiplied by 200,000 then divided by Total Hours Worked = Recordable Incident Rate].

4.6 **Routine Functions:**

For record keeping purposes, an employee's routine functions are those work activities that an employee regularly performs at least once a week.

4.7 **Work-Related:**

A case is work-related anytime an event or exposure in the work environment is the discernible cause or contributes to an injury or illness or significantly aggravates a pre-existing injury or illness. The work environment includes the establishment and other locations where one or more employees are working or are present as a condition of their employment. Training that is required by the employer is a work related activity. For the purposes of this program, the following types of incidents are NOT considered to be work-related:

- a) Off-duty injuries occurring in crew accommodations, camp, galley, or away from the work site;
- b) Symptoms arising on premises totally due to outside factors such as injuries, illnesses, or fatalities due to a naturally occurring factor (hurricane, earthquake,

lightning) that is otherwise not related to Rig operations. Incidents of this type should not be reported;

- c) Member of the general public, visitors, regulatory agents, employee(s) off duty waiting for transportation to shore or off of the location;
- d) An injury or illness that results solely from voluntary participation in a wellness program or in a medical, fitness, or recreational activity such as blood donation, physical examination, flu shot, exercise class, racquetball, or other sports activity;
- e) The injury or illness is the result of the employee eating, drinking, or preparing food or drink for personal consumption. **Note: An injury to a person assigned by the company to prepare food for company personnel is work-related;**
- f) The injury or illness is the result of an employee doing personal tasks, unrelated to their employment, at the establishment;
- g) The injury or illness is the result of personal grooming, self-medication for a non-work related condition, or is intentionally self-inflicted;
- h) The injury or illness is caused by a motor vehicle accident while the injured is commuting to or from work even if the accident occurs on company property;
- i) Cold or flu;
- j) Following an investigation, the injury or illness is determined to have resulted solely from a pre-existing condition, which resulted in signs or symptoms surfacing at work, but were not caused by, exacerbated by, or cannot be linked back to a work activity or;
- k) An injury that results from a natural bodily action or reaction such as walking or bending, coughing or sneezing, that is unrelated to work.

4.7.1 Work-Related Vehicle Incidents:

- a) Any crash involving a company, rental or personal vehicle while performing company business.
- b) Work relationship is presumed for crashes resulting from business being conducted on behalf of the company while operating a company assigned vehicle. Examples of company business include:
 - o Driving an employee or client to the airport, driving to the airport for a business trip;
 - o Taking a client or work colleague out for a business related meal;
 - o Deliveries;
 - o Visiting clients or customers, or driving to a business related appointment.
- c) Personal business which should not be counted includes, but is not limited to:
 - o Running a personal errand;
 - o Getting a meal by yourself;
 - o A non-business meal with colleagues;
 - o Commuting to and from home, (including established home away from home) or ;
 - o Driving to a personal medical appointment.

5.0 Harmonization of IADC vs OSHA vs OGP

Although there are slight differences between IADC, OSHA and OGP, the main difference between IADC / OSHA and OGP reporting requirements relates to OGP requiring E&P organizations to report incidents associated with their own personnel, third party personnel as well as contractor and subcontractor personnel. The focus of the IADC and OSHA reporting requirements relates to participating company personnel only (as per paragraph 1.6.1).

With respect to the reporting of medical treatment cases, the IADC, OGP and OSHA are aligned, such that a MTC reported under OSHA should also be reported to IADC.

There are some differences in how OGP and OSHA establish work relatedness with the OGP requirements being more inclusive of incidents outside the **direct** control of the employer.