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Interoffice Memorandum

APRIL 1, 1987

FROM: SENIOR ENGINEER - PROCESS ENGINEERING ENVIRONMENTAL/UTILITIES
DEER PARK MANUFACTURING COMPLEX

TO: ALL MANAGERS AND SUPERVISORS
DEER PARK MANUFACTURING COMPLEX

SUBJECT: MANDATORY HEALTH & SAFETY TRAINING REQUIREMENTS

Attached is some information on all mandatory Health & Safety training requirements that apply to DPMC. Although in general we have an excellent H&S training program, it is essential all the minimum OSHA and Shell requirements are met.

There are three attachments. Attachment I is a simple listing of all topics which must be covered, grouped by "Basic/Initial Training" and "Annual Refresher Training." Attachment II describes how the training is accomplished (e.g. which groups receive which types of training, at what times, who provides it, and what resources are available). Attachment III is a reference document which lists information on each training subject.

I recommend that each Department review the list to ensure that all training and documentation for which they are responsible is being carried out.

As part of our DPMC Compliance Audit Program, all training records will be audited in the fourth quarter of this year.

If you have any questions on the requirements, please contact me at X-7781.

C. M. Hutchings
C. M. Hutchings

CMH:mh

Attachments

cc: Deer Park
T. E. Gillespie
All Safety Personnel
Safety Satellite

Head Office
K. C. Crawford

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HEALTH & SAFETY TRAINING REQUIREMENTS

BASIC/INITIAL TRAINING

ALL NEW EMPLOYEES

EMERGENCY ACTION PLAN/EMERGENCY RESPONSE PLAN
FIRE PREVENTION PLAN
PORTABLE FIRE EXTINGUISHERS
WARNING SIGNS
EMBRYO/FETUS COUNSELING

ALL NEW OPERATIONS/FIELD EMPLOYEES

EMERGENCY ACTION PLAN/EMERGENCY RESPONSE PLAN
FIRE PREVENTION PLAN
PORTABLE FIRE EXTINGUISHERS
WARNING SIGNS
EMBRYO/FETUS COUNSELING
HAZARD COMMUNICATION
HEARING CONSERVATION
 TRAINING
 (AUDIOMETRIC TESTING)
RESPIRATORY PROTECTION
 TRAINING
 SMOKEHOUSE
 (FIT TEST)
(ASBESTOS TRAINING

AREA/JOB/CRAFT/SKILL SPECIFIC TRAINING

HAZARD COMMUNICATION - LOCAL INFO
EMERGENCY ACTION PLAN/EMERGENCY RESPONSE PLAN - LOCAL INFO
FIRE PREVENTION PLAN - LOCAL INFO
RESPIRATORY PROTECTION - LOCAL INFO
EMBRYO/FETUS COUNSELING
HAZARDOUS WASTE SITE OPERATIONS
LPG STORAGE/HANDLING FACILITIES
STORAGE TANKS
EMERGENCY RESPONSE TEAMS
ASBESTOS (FIT TEST)
VCM
LEAD
FIRE BRIGADE
AERIAL LIFT EQUIPMENT
POWERED INDUSTRIAL TRUCKS (FORKLIFTS)
CRANES
SLINGS
MECHANICAL POWER PRESSES
WELDING EQUIPMENT

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ANNUAL REFRESHER TRAINING

ALL EMPLOYEES

PORTABLE FIRE EXTINGUISHERS

ALL OPERATIONS/MAINTENANCE EMPLOYEES

PORTABLE FIRE EXTINGUISHERS
HEARING CONSERVATION

TRAINING
(AUDIOMETRIC TESTING)

RESPIRATORY PROTECTION
ANNUAL TRAINING
BIANNUAL SMOKEHOUSE TRAINING
(BIANNUAL FIT TEST)

ASBESTOS TRAINING

AREA/JOB/SKILL SPECIFIC TRAINING

VCM

LEAD

HAZARDOUS WASTE SITE OPERATIONS

EMERGENCY RESPONSE TEAMS

(SEMI-ANNUAL ASBESTOS FIT TEST)

NOTES: (1) ANNUAL ASBESTOS TRAINING GENERALLY APPLIES TO
ALL O&M EMPLOYEES, WHILE SEMI-ANNUAL FIT TESTING IS
ONLY GIVEN TO A SELECT GROUP, PRIMARILY INSULATORS

(2) ITEMS IN PARENTHESES (AUDIOMETRIC, FIT TESTING) ARE
TESTING REQUIREMENTS AND INCLUDED AS REMINDERS, SINCE
THEY ARE SOMETIMES HANDLED ALONG WITH TRAINING

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IMPLEMENTATION OF HEALTH & SAFETY
MANDATORY TRAINING REQUIREMENTS

BASIC/INITIAL TRAINING

All new employees receive formal H&S training as part of the New Employee Orientation conducted by the Training Department. Employees are grouped for Orientation either as Support Staff, Professional Staff, or Operations Employees.

When the new employee arrives at his assigned job, or is reassigned to another job, he receives additional H&S training specific to his assignment.

Also, training is required for some specialized skills not necessarily related to job assignment.

New Support Staff

Support Staff receive Phase I training (one day), plus a supplemental day of training, both of which include some H&S training. These elements must be included:

<u>Topic</u>	<u>Presented by</u>	<u>Already in Program?</u>
Fire Prevention Plan	Safety	Yes
Portable Fire Extinguishers	Safety	Yes
Warning Signs	Safety	Not sure
Emergency Plans	Safety	Yes

The presenters are responsible to be sure the required material is covered. Safety must assure Warning Signs is covered in one of their segments.

Each Department Manager is responsible for counseling their new female employees on the Embryo Fetus Protection policy and local potential for exposure. A video tape is being prepared which covers the general aspects of the policy (contact Industrial Hygiene). They are also responsible to be sure the employee is familiar with any local emergency plans, if applicable (e.g. evacuation plan).

New Professional Employees

The Training Department conducts two full days of HS&E training for new professional staff, known as Phase II Training. These elements must be included:

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<u>Topic</u>	<u>Presented by</u>	<u>Already in Program?</u>
Hazard Communications	Industrial Hygiene	Yes
Hearing Conservation	Safety	Yes
Emergency Plans	Safety	Yes
Fire Prevention Plan	Safety	Yes
Respiratory Protection	Safety	Yes
Portable Fire Extinguishers	Safety	Yes
Warning Signs	Safety	Not sure

The H&S presenters are responsible to be sure the required material is covered. Safety must assure Warning Signs is covered in one of their segments.

All Department Managers are responsible for counseling new female employees on the Embryo Fetus Protection policy and local potential for exposure. A video tape is being prepared which covers the general aspects of the policy (contact Industrial Hygiene). They are also responsible to be sure the employee is familiar with any local emergency plans, if applicable (e.g. evacuation plan).

New Operations Employees. General

As part of their Phase I training, new Operators get two days of HS&E training essentially the same as new Professional employees. The same requirements apply to this portion of their training, with the addition of Asbestos training. In the past, initial Asbestos training has been the responsibility of each Department. But it is logical to move it to Phase I, since it does apply to all employees who may come in contact with asbestos. The presentation could be included in one of Safety's segments. (The Departments are still responsible for Asbestos refresher training, discussed later.)

New operations employees also receive audiometric and respirator fit tests.

New/Reassigned Operators/Craftsmen. Area Specific or Job Specific

When any new or reassigned operator or craftsman arrives on the new job, his initial H&S training must include:

- Local Hazard Communication information
- Local Emergency Plans
- Local Fire Prevention Plans
- Local Respiratory Protection procedures

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All females must be counselled on the Embryo Fetus Protection policy and local potential for exposure. A video

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tape is being prepared which covers the general aspects of the policy (contact Industrial Hygiene). If they are reassigned employees, they should already be familiar with the policy and only need to be counselled on local potential for exposure.

Depending on the Department or job, some additional H&S training (testing) requirements may apply. These are:

- LPG Storage/Handling Facilities
- Storage Tanks
- VCM Training
- Lead Training
- Aerial Lift Equipment
- Powered Industrial Trucks (Forklifts)
- Cranes
- Slings
- Mechanical Power Presses
- Welding Equipment
- Hazardous Waste Operations
- Emergency Response Teams
- (Asbestos fit test)

If operating or maintaining any of this equipment or handling any of these materials is part of the employees job, then it is the responsibility of the Department to assure the employee is trained and to keep the record. In practice, if these items are part of the job qualification, they are included in the job training program. The documentation can be handled in one of two ways:

1. Document that each individual topic was covered, or
2. Be able to demonstrate each topic is covered in the job training program, and document the program was completed.

Skill Specific Training

Sometimes an employee needs a new skill that is not part of the job training. For example, fire crew members must be trained; that is not part of the employee's job requirements and is handled on an "as needed" basis. Another example is aerial (personnel) lift equipment. Some craftsmen receive this training as part of their job. But an operating Department may want some operators to have this skill, and it was not part of their job training. In this case, they must be trained, and their training documented. The area of "skill training" could include these topics:

- Fire Brigade
- Aerial Lift Equipment
- Powered Industrial Trucks (Forklifts)
- Cranes

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Slings
Mechanical Power Presses
Emergency Response Teams

PERIODIC REFRESHER TRAINING

All Employees

All Department Managers must provide portable fire extinguisher training for their employees once/year. They should contact Safety to arrange for hands-on training, or contact Training to use their video tape.

All Operations/Maintenance Employees

In addition to fire extinguisher training, each Operations/Maintenance employee must receive refresher training (testing) on:

<u>Topic</u>	<u>Frequency</u>	<u>Responsible</u>
Portable Fire Extinguishers	Annual	Department
Hearing Conservation	Annual	Department
(Audiometric test)	Annual	Medical
Respiratory Protection		
Training	Annual	Department
Smokehouse training	Biannual	Department
(Fit test)	Biannual	Industrial Hygiene
Asbestos Training	Annual	Department

To conduct Portable Fire Extinguisher Training, contact Safety to arrange for hands-on training, or contact Training for a video tape.

Contact Safety to arrange for smokehouse respiratory training.

A video tape for asbestos training is available through Training.

Area or Job Specific Training

Depending on the employee's area or job assignment, the following refresher training is required on an annual basis

<u>Topic</u>	<u>Frequency</u>	<u>Responsible</u>
VCM training	Annual	Department
Lead training	Annual	Department
Emergency Response Team-		
Safety personnel	Annual	Safety

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<u>Topic (Con't)</u>	<u>Frequency</u>	<u>Responsible</u>
Hazardous Waste Site	Annual	Department
Operations	Semi-annual	Industrial Hygiene
(Asbestos fit test)		

Skill Specific Training

Members of Emergency Response Teams must receive refresher training. These teams are:

<u>Team</u>	<u>Frequency</u>
Fire Brigade	Annual
Haz Mat Team	Annual
Response Action Team	Monthly

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HEALTH & SAFETY TRAINING REQUIREMENTS-DPMC

NO.	CATEGORY	RESPONSIBLE	RECIPIENT	COMMENTS	IMPLEMENTATION
1	HEARING CONSERVATION	O/M Depts having exposed employees	All exposed employees	OSHA 1910.95 requires that any employee who works in an area where he is exposed to over 85 dB must be trained on the employers' Hearing Conservation program. Shell goes further to require initial and annual training per H&S Order S-124. The requirement is filled by reviewing the contents of the Order with the employees. This generally applies to all field personnel. Records are mandatory per Shell.	The Training Dept. handles the initial training for new Operations/Professional employees. For annual refresher, each Dept holds Safety meetings or training sessions.
2	WARNING SIGNS	All Departments	All employees	OSHA 1910.145 requires that all employees be instructed on the various danger and caution signs used in the plant. Order S-112 contains the information. All employees are required to know this Order. Records are not mandatory, employee knowledge is.	All new employees receive Safety Training in Orientation. The highlights of Order S-112 should be reviewed as part of this.
3	HAZARD COMMUNICATION	All O/M Depts	All field personnel	Training is required initially and when new hazard is introduced, per OSHA 1910.1200 and H&S Order S-110. Documentation of initial training and training when an employee is assigned to a new area is required. Records on training when a new chemical is introduced to an area are not required; however, the Dept should be able to verify this happens either by employee knowledge, procedure, or record of a note to employees about the new chemical.	Initial overview of Haz Comm provided in new employee Orientation. Specific chemical training provided by Dept. When the Dept. gets a new chemical, they may train by issuing a memo and MSDS, and should retain a copy in their Satellite file.
4	EMBRYO/FETUS PROGRAM	All O/M Depts	Affected female employees	Counsel females of childbearing capability on policy and potential for chemical exposure in that job, both initially and when a job change results in a new chemical exposure. This is a Corporate Policy.	Industrial Hygiene is preparing a video tape which may be used for training new employees on the policy. Discussion on area chemicals must also be provided. (Embryo-Fetus Protection policy manual)

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NO.	CATEGORY	RESPONSIBLE	RECIPIENT	COMMENTS	IMPLEMENTATION
5	LPG STORAGE AND HANDLING FACILITIES	All O/H Depts	Field personnel who work around LPG	Per OSHA 1910.110(b)(11b) "Personnel performing installation, removal, operation, and maintenance work shall be properly trained in such function." regarding LPG storage/handling. Fulfilled by regular job training.	For Maintenance, job training suffices. For Operations, each Dept handling LPG should assure hazards, safe handling procedures are covered in training manuals or Dept procedures.
6	STORAGE TANKS	Operations	Affected operators	Where a tank of flammable/combustible matl is in an area which may flood, employees must be thoroughly instructed to respond to flood emergencies, per OSHA 1910.106. Covered by operator job training.	Operating Depts with tankage should assure training manuals/Dept procedures address flood emergencies.
7	EMERGENCY ACTION PLAN/EMERGENCY RESPONSE PLAN	All Departments	All employees	Per OSHA 1910.38, we must have an "emergency action plan" which covers escape procedures, routes, alarms, responsibilities. All employees must be trained. Those who lead the evacuation (wardens) must be trained to lead the evacuation. DPHC policy (11/6/85 memo from Mgr. H&S) requires each Operating Dept to have a written plan to cover area hazards and response to emergencies: releases, fires, evacuation, etc. Training is required for new employees and when employee job assignment or procedures change.	All personnel should be familiar with Order S-101, "Emergency Plans." New employee orientation includes a segment on Emergency Plans. Each building has an evacuation plan. Each Manager should acquaint each new office employee with their plan. Each new Operations employee should be trained on their area Emergency Response Plan as they come into the Dept or when the plan is revised.
8	FIRE PREVENTION	All Departments	All employees	OSHA 1910.38 requires every employer to have a fire prevention plan, and to train all those subject to the plan. The plan should cover workplace fire hazards, fire equipment, precautions, housekeeping, responsibilities, etc. At DPHC, this plan is a combination of many documents. H&S Orders S-100 & S-116 cover all info needed for office employees. For field employees, the plan includes all H&S Orders (Complex & Departmental), training manuals, local procedures, etc.	All personnel should be familiar with Order S-100, and highlights should be included in new employee Orientation. New Operators receive extensive Safety training including aspects of fire prevention, as part of the initial training in their assigned areas.

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NO.	CATEGORY	RESPONSIBLE	RECIPIENT	COMMENTS	IMPLEMENTATION
9	FIRE BRIGADE	H&S	Leaders/members	Per OSHA 1910.156 the fire brigade must be trained. Leaders more training than members. Train also on special hazards. This is handled by the fire chief, who also maintains the training records.	No changes needed.
10	PORTABLE FIRE EXTINGUISHERS	All Departments	All who may use	Any employee who may use a portable fire extinguisher must be trained initially and annually. A record is required. Either "classroom" or hands-on training will meet the requirement. Per OSHA 1910.157.	All new employees receive fire training covering fire extinguishers as part of Orientation. Refresher training must be provided by each department. Some video tapes are available from Training.
11	HAZARDOUS WASTE SITE OPERATIONS	Depts with RCRA facilities	All RCRA facility operators	Per OSHA 1910.120, all employees who operate hazardous waste treatment, storage or disposal facilities under RCRA and who may be exposed to hazardous chemicals must receive H&S training, both initially and annually.	The initial training is covered through existing orientation and job training. These operators all receive annual RCRA training from Environmental Opns, and other annual H&S training which together meet the OSHA requirement.
12	EMERGENCY RESPONSE TEAMS	Affected Departments	Personnel on Emergency Resp Teams	Personnel who respond to emergency releases of hazardous wastes or substances must receive training. Per OSHA 1910.120.	This applies to Safety personnel, RAT Teams, Haz Mat Teams, and the Fire Brigade. Implementation in progress.

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NO.	CATEGORY	RESPONSIBLE	RECIPIENT	COMMENTS	IMPLEMENTATION
13	RESPIRATORY PROTECTION	All O/M Depts	All personnel who may use	OSHA 1910.134 requires training, including wearing respirator in normal and test atmospheres. H&S Order S-108 requires annual respiratory training, including a review of the Order and Departmental Procedures, plus smokehouse training every two years and fit testing every two years. Dept keeps annual and smokehouse training records, IH keeps fit test records (cards issued). IH normally schedules the fit testing.	General initial training is covered in new employee Orientation. Operations employees must receive local procedure, chemicals training when they arrive at the unit. Also, refresher training must be provided by each Department. Order S-108 and local procedures, chemical properties must be covered annually. Smokehouse training must be covered every two years.
14	ASBESTOS	All O/M Depts	Any employee who could be exposed	Train in health effects, PPE, per OSHA 1910.1001. Order S-125 requires employees who work with asbestos to be trained annually.	A video tape is available to view for asbestos training. Training is still a requirement for all O&M employees.
15	VCM	All Departments who handle VCM	Any employee who could be exposed	Initially and annually, those subject to exposure must be trained per OSHA 1910.1017.	Provided by the Department, specific to employees who work with VCM.
16	LEAD	All Departments who handle lead	Any employee who could be exposed	Initially and annually, those subject to exposure must be trained per OSHA 1910.1025. "Lead" for DPNC is TEL	Provided by the Department, specific to employees who work with lead.

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NO.	CATEGORY	RESPONSIBLE	RECIPIENT	COMMENTS	IMPLEMENTATION
17	AERIAL LIFT EQUIP	Department resp for equipment	All operators (see note below)	Per OSHA 1910.67, employees must be "trained to operate"	Training will work with Maintenance to develop a program to train people in the operation of aerial (personnel) lift equip. Similar to the requirement for forklifts.
18	RIM WHEELS	Department resp for equipment	All servicers	Train and evaluate performance of rim wheel servicers, per OSHA 1910.177.	This service is done by contractors, no action needed.
19	POWERED INDUSTRIAL TRUCKS	Department resp for equipment	All operators	Includes fork lifts, tractors, ect., per OSHA 1910.178. All operators must be "trained to operate."	A program is available through the Training Dept. All employees who use must be trained.
20	OVERHEAD/BATTERY CRANES	Department resp for equipment	All operators	Per OSHA 1910.179, only "designated personnel may operate." Designated means "selected or assigned....as being qualified to perform specific duties."	For this item and item #21, all crane operators of any type must be trained. Training Dept will work with Maintenance to develop a program for training all who need this skill, but do not get this as part of craft training (e.g. riggers)
21	CRAWLER/LOCOMOTIVE TRUCK CRANES	Department resp for equipment	All operators	Per OSHA 1910.180 only designated personnel may operate	
22	SLINGS	Department resp for equipment	All inspectors	Slings must be inspected daily before use by a "competent person designated by the employer", per OSHA 1910.184.	A video on sling use and inspection will be developed, included as part of new operator training, and made avail for Safety meetings.

Note: The terms "operators" and "inspectors" here refers to the equipment operators and inspectors--it is not a job classification.

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NO.	CATEGORY	RESPONSIBLE	RECIPIENT	COMMENTS	IMPLEMENTATION
23	MECHANICAL POWER PRESSES	Department resp for equipment	(1) All inspectors (2) All operators	Per OSHA 1910.217, the employer is required to insure the competence of inspection and maintenance personnel. The employer shall train and instruct the operator in the safe method of work.	We have one mechanical power press, in the boilermakers' shop.
24	WELDING	Department resp for equipment	All Welders	Welders in charge of O2/fuel gas supply equip must be instructed and judged competent, per OSHA 1910.252. Orders M-135, M-108N deal with O2 handling. Operators of "welding equipment" must be instructed. See also Order M-105. Maintenance personnel must be qualified to make repairs	All OSHA required training is covered as part of current welder craft training program.

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