

Ethanolamines/Glycol Ethers

Tier 3 Procedure

Section Number: 2005
Issue Number: 1.2
Original Date: 07-10-95 **Author:** Mike Buhler
Revision Date: 03-12-96
Title: Training Policy
References: QSP15 Personnel Training
IPT Modules
S&LP S331 Dow Employee Training
Training T-9 Check Sheet
Procedure Review Policy
1809 Management of Change
P&IDs/Operating Procedures

2005. Training Policy

1.0 Objective:

- 1.1 The scope of this policy is to detail the goals, expectations and requirements of the Ethanolamines/Glycol Ethers plant training program. Although it applies to all plant training requirements, it specifically outlines the requirements for the IPT (in-plant-training) program. This document should be used by supervision, trainers, and trainees to understand the direction and focus of the plant's training program.

2.0 Responsibility

- 2.1 Supervision is responsible for ensuring compliance with training and for ensuring appropriate retraining if employees demonstrate a lack of understanding through either observed performance or incident. If an individual repeatedly demonstrates a lack of compliance with the training received he will meet with supervision to develop a written performance improvement plan. Appropriate disciplinary actions may be taken if individuals fail to demonstrate compliance with the written performance improvement plan.
- 2.2 It is the responsibility of the employee to notify supervision if they desire or need additional training in order to accomplish their job requirements.

The ultimate responsibility for determining the level of job knowledge and competence is shared by both the trainee and the trainee's immediate supervisor.

2.3 It is the responsibility of the employee to ensure that required training is completed and that they are knowledgeable of the training material. If an employee misses a scheduled training class, it the responsibility of that employee to insure that the training is completed in a timely manner.

2.4 It is the responsibility of the trainer to test for proficiency, document all completed training, and insure that records are maintained and filed.

3.0 Training Overview

3.1 Training requirements mandated by OSHA for safety and industrial hygiene are defined as part of the C-9 check sheet and S&LP 331.

3.2 Training requirements mandated by the various environmental regulatory agencies are defined as part of the E-9 checklist.

3.3 Procedure reviews are defined as required training and are driven by OSHA, ISO 9002 and Operating Discipline.

3.4 Training on changes to the process and/or procedures (including IPT modules) will be documented and driven by the Management of Change process. New procedures will be communicated and approved via the MOC process as well.

3.4.1 When developing a new training module, approval of training modules contents is required. This approval process will include a review of the modules contents by both operation supervisors.

3.5 Refresher training for operations is required by OSHA every three years. This requirement will be met by completion of the IPT section tests modules for operations personnel and by a review of the Consolidated Audit manual and Reactive Chemicals Manual by technical personnel.

3.6 Technical employees include developmental engineers, process engineers, production supervisor and plant superintendent.

3.7 Additional training will be provided as needed. It is the responsibility of each individual employee to notify supervision if they desire or need additional training. This additional training can be accomplished in a variety of ways including IPT Review, one-on-one oral review, task demonstration, pilot courses, etc. The end result must be that all

employees are competent to perform their job responsibilities as per procedure and/or in a safe and environmentally sound manner.

- 3.8 Overall training requirements and applicability to each plant employee is outlined in the T-9 Checklist for the plant.

4.0 Trainer/Instructor Qualifications

- 4.1 All training must be conducted by qualified personnel who are knowledgeable of the material being taught. Qualifications required to be a trainer/instructor are as follows:

- Operator designated by supervision that has completed required training on subject matter being taught and has greater than five years experience in the current process.
- Engineer that has completed all training required in their specific area

- 4.2 Specialized training can be performed by a person who has completed an instructor certification class. These records are filed in the document managers offices and updated on a regular basis. Where training is required by an instructor training class is not available, training can be done by the knowledgeable "expert" as defined by their job description/responsibilities.

5.0 Proficiency Testing

- 5.1 Trainers/Instructions must made sure that each trainee has access to the Training Resources necessary . For IPT module completion, the trainee needs adequate time to study and complete all of the assigned objectives. After a trainee completes the assigned objectives, they will be evaluated by a qualified trainer/instructor. At no time will anyone be assigned a job task in which he or she has not satisfactorily completed the required training unless accompanied by a properly trained co-worker.

- 5.2 Verification of proficiency on a subject or area is accomplished by one or more of the following methods:

5.2.1 Oral Evaluation

5.2.2 Written evaluation

5.2.3 On-the-job observation by qualified trainer/instructor

- 5.3 Documentation verifying the trainee's proficiency must be kept on file. When using a written evaluation, regardless of the final score, the

evaluator and the trainee must review and correctly answer any and all missed questions(s). This may be done in a group format.

- 5.4 On test scores of **(85%-100% - Pass)**, the trainee may advance to the next area of training or be defined as trained only after reviewing and correctly answering all the missed questions. At this point, the trainee has completed all the training requirements to a performance level of 100% correct.
- 5.5 On test scores **(below 85% - Fail)**, the trainee will be required to review the missed questions and training module a second time, then retake the written evaluation. A passing score must be achieved before advancing to the next area of training. Trainee's failing to achieve a passing score after three opportunities will be given additional assistance in completing their training goals.
 - 5.5.1 Trainees failing to achieve a passing score after three opportunities will be given additional assistance in completing training goals only after consultation with supervision resulting in a written performance improvement plan. Failure to meet requirements of the written performance improvement plan may result in disciplinary action.
- 5.6 To document a trainee's proficiency on IPT modules, an IPT Training Documentation sheet must be filled out and filed.

Revision No. 1	08-24-95	Added 3.4.1, and 5.5.1 Revised 5.1, 2.1, and 4.1
Revision 2	3/11/96	Added P&IDs/Procedures to reference list