

TRAINING LHC II

Scope

The scope of this policy is to detail the goals and requirements of the LHC II Training Program. This document should be used by all LHC II employees to understand the direction and focus of the training program. The training program will be reviewed periodically as need dictates, as specified by OSHA Process Safety Management or as improvements in the training process may arise.

Policy Statement

The goal of the LHC II training program is to provide each and every employee with the necessary knowledge and skills to be able to do his job proficiently, to improve performance and help further career development. Prior to assuming responsibility for a job, each employee will be properly trained and will demonstrate proficiency based on a predefined and consistent verification process. All training will be documented. The documentation will be filed in such a manner as to allow easy retrieval and access.

All instructors must be qualified and proficient in those areas for which they provide instruction. Proficiency will be verified by the Plant Superintendent and/or the Production Manager as appropriate. Verification will be by on the job observation and will be documented.

Refresher training will be defined for all jobs and will be required of all employees to complete at intervals as indicated on the T-9 Training Checklists, Operations C-9 Checklist and LHC II Block Checklist.

IPT Program Overview

The IPT program is organized by subject matter and by the different process areas of the plant. Each subject and area of training consist of a specific group of training objectives called Modules. The training objectives in each module will not only evaluate job knowledge, but also the actual skill level of the employee.

Newly developed or revised IPT modules will be approved using the Management of Change with Level 2 approval. The IPT modules that have been or will be developed for all job functions at LHC II include, but are not limited to the following:

- Operations Specialist - Furnace
- Operations Specialist - Mechanical
- Operations Specialist - Process
- Quality Control and Measurement
- Senior Operation Specialist - Furnace Board

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- Senior Operation Specialist - Purification Board
- Utilities Operations
- Analytical - Senior Technician
- Safety (this may be several different modules)
- Environmental Control
- Industrial Hygiene
- Maintenance (this may be several different modules)

In order for each objective in a module to be completed, information must exist and be available to the trainee. This type of information is referred to as training Resources.

Examples of training resources:

- Written Job Procedures
- USA and LAD Safety and Loss Prevention Standards
- Training Courses/Videos
- Pilot Courses
- Operations Training Standardization Modules
- Vendor Training

The IPT system will not replace our long established one-on-one operator training, but will be used in conjunction with the one-on-one training to develop trained employees. All progression OS's (and SOS's if transferred in from outside plant or off maintenance) will be assigned an experienced SOS who will coach them through their training.

Refresher training will be defined for all jobs and will be required of all employees to complete at intervals as indicated on the T-9 Training Checklists, Operations C-9 Checklist and LHC II Block Checklist.

The ultimate goal of the IPT program is to maintain a consistent method of training and evaluating the minimum job requirements for all LHC II operations and support personnel.

Trainer/Instructor Qualifications

All instructors must be qualified and proficient in those areas for which they provide instruction. Proficiency will be verified by the Plant Superintendent and/or the Production Manager as appropriate. Verification will be by on the job observation and will be documented. Qualifications required to be a process trainer/instructor are as follows:

- Development Engineer that has completed all of the training required in their specific process area and job assignment (i.e. only qualified to instruct on the specific area they have been trained in).
- Operations Supervisor or a SOS Designee with 5 years or more of experience in the current production process.

- Production Engineer or higher with 2 years or more of experience in the current production process.
- Any specialized training can be conducted by a person who has completed and passed an instructor certification class. The completion of the instructor certification class must be documented.

Proficiency Training/Testing

Trainers/Instructors must make sure that each trainee has access to the Testing Resources and the IPT Modules and that they are given adequate time to study and complete all of the assigned objectives. After a trainee completes the assigned objectives, he will be evaluated by a qualified trainer/instructor.

The trainee's supervisor can involve any number of people in the trainee's final test on a module, or he can test the employee by himself. The supervisor cannot delegate the final test. The ultimate responsibility for determining the level of job knowledge and competence of the trainee resides with the supervisor.

Training on overtime should be kept to a minimum, but will be allowed if approved through the proper channels.

Section testing on a module should be taken on scheduled work days with your supervisor. Pilot course testing can be taken on scheduled work days depending on plant conditions and operations coverage. Testing on pilot courses can also be done on days off as long as the 8 hour work day minimum is met. Pilot course tests do not have to be scheduled in advance, but the Training Coordinator needs to know the day you plan to test so he can communicate the number of people to the Training Center.

Refresher training on the above modules will be required every three years with the exception of the Environmental and Industrial Hygiene modules which require annual review. Additional refresher training will be required as indicated on the T-9 Training Checklists, the Operations C-9 Checklist and the LHC II Block Checklist.

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

1. Oral Evaluation
2. Written Evaluation
3. On-the-job Observation by Qualified Trainer/Instructor.

Documentation verifying the trainee's proficiency must be kept on file with the Training Coordinator. When using a written evaluation, regardless of the final score, the evaluator and the trainee must review and correctly answer any and all missed question(s).

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On test scores of (85% to 100% - Pass), the trainee may advance to the next area of training 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.

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's in completing their training goals.

To document a trainee's proficiency a "Training Qualification Sheet" must be signed by a qualified trainer/instructor and kept on file with the Training Coordinator. It is the responsibility of the Training Coordinator to document the progress of all completed training.

Training Groups Defined

IPT modules have been developed for the following work groups:

- Operations Personnel
- Technical Staff
- Operations Support Personnel

New Employee Training

All employees new to LHC II will be required to complete the New Employee Orientation Module. In addition, all new technical/professional employees will be required to complete the New Technical Employee Orientation Supplement as well.

The individual's immediate supervisor shall be the instructor of record and will be responsible for ensuring that all training requirements are satisfied.

Operations Personnel Training

The backbone of the operator training program at LHC II will be the IPT system with module(s) developed for each job function.

Employees that were either hired after May 1992, or whose job has changed, will be expected to complete the appropriate IPT modules for all new job responsibilities prior to assuming responsibility for the job.

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Employee training on job procedures will be accomplished through one on one and hands on. This will include the useage and retrieval of job procedures.

While the bulk of training will utilize the IPT format other training methods will be used and incorporated into the total training effort. These other methods will include, but will not necessarily be limited to, the following:

- Our long established one-on-one type operator training. All progression OS's (and SOS's if transferred in from outside plant or off maintenance) will be assigned an experienced SOS who will coach them through their training.
- Training courses available through the Division Training Department and other departments in the division.
- Completion of Pilot Courses, also available through the Training Department, will be required as part of employee training as well. In most cases these courses will be incorporated into the appropriate IPT modules and must be completed as part of the module. In some cases they will be stand alone requirements and will be treated like other Training Department courses as discussed above.
- Operations Training Standardization Modules
- Vendor Training

Training Aids

To enhance and supplement the IPT modules other training aids will be developed as follows:

- Up-to-date job descriptions will be maintained for all job functions.
- IPT resources (operations manual type information) will be developed for each of the modules. Resources will include drawings, manuals, vendor manuals, engineers, or other operators.
- Simplified system sketches will be drawn for each system in the plant to be used for training.
- Up-to-date job procedures utilizing the Policy/Procedure Review Policy will be kept on file for all jobs. These job procedures will be developed primarily by the person typically doing the job. For instance, operations would write procedures for swapping columns, maintenance would write procedures for changing a pump seal.

The individual's immediate supervisor shall be the instructor of record and will be responsible for ensuring that all training requirements are satisfied.

Operations Support Personnel

Non-exempt non-operations training will consist of the following:

- New Employee Orientation Module
- All IPT modules for the OS classification (unless grandfathered)
- Current Consolidated Audit Report

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- Current Tech Center Audit Report

Training programs will be developed to cover the following areas and job classifications. The following job classifications will be covered under exempt training:

- Safety Coordinator
- Training Coordinator
- Environmental Coordinator
- Lab Coordinator
- Engineering Assistant

The individual's immediate supervisor shall be the instructor of record and will be responsible for ensuring that all training requirements are satisfied.

Verification of proficiency for these areas and job classifications will be by on-the-job observation by the individual's supervisor.

As a training supplement, each job classification will have additional training requirements consisting mainly of various courses available through the Training Department as outlined on the T-9 checklists. Completion of these courses is not a prerequisite for assuming responsibility for a job but a timetable must be developed by the employee and his supervisor to insure that all the necessary training is obtained. Completion of selective courses should be a part of each employee's annual goals.

The individual may also be assigned additional training requirements as deemed necessary by his supervisor.

Refresher training required every three years will consist of a review of the latest Consolidated Audit and the Ethylene Tech Center Audit. Additional refresher training will be required as indicated on the T-9 Training Checklists, the Operations C-9 Checklist and the LHC II Block Checklist.

Technical and Office Professional Personnel

Exempt Training will consist of the following:

- New Employee Orientation Module
- New Technical Employee Orientation Supplement
- Current Consolidated Audit Report
- Current Tech Center Audit Report
- Critical Procedures (as defined in LHC II Procedure Policy)

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The following job classifications will be covered under exempt training:

- Office Professional
- Supervisor
- Area Engineer
- Project Engineer
- Production Supervisor
- Plant Superintendent

The individual's immediate supervisor shall be the instructor of record and will be responsible for ensuring that all training requirements are satisfied.

Verification of proficiency for these areas and job classifications will be by on-the-job observation by the supervisor.

As a training supplement, each job classification will have additional training requirements consisting mainly of various courses available through the Training Department as outlined on the T-9 checklists. Completion of these courses is not a prerequisite for assuming responsibility for a job but a timetable must be developed by the employee and his supervisor to insure that all the necessary training is obtained. Completion of selective courses should be a part of each employees goals.

The individual may also be assigned additional training requirements as deemed necessary by his supervisor.

Refresher training required every three years will consist of a review of the latest Consolidated Audit and the Ethylene Tech Center Audit. Additional refresher training will be required as indicated on the T-9 Training Checklists, the Operations C-9 Checklist and the LHC II Block Checklist.

Responsibilities

Training is a shared responsibility for everyone. Supervision has the responsibility to see that the appropriate training needs are determined and provided for each employee. Each employee is responsible for actively participating in the available/required training programs and in demonstrating proficiency/competency as a result. If an employee feels that he has not received adequate training in order for him to perform his job, he must notify supervision so that additional training can be provided.

The Training Coordinator is responsible for seeing that the T-9 Training Checklists, the Operations C-9 Checklist and the LHC II Block Checklist are kept current to reflect any additions, deletions or changes in content or frequency of any and all training requirements for all LHC II employees.

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The Training Coordinator is responsible for maintaining all training materials. As a minimum this will include an annual review to insure the adequacy, pertinence and accuracy of the material. For the operations IPT modules this review must include an operations supervisor and a representative from each of the four operations shifts. Each representative should seek input from the other members of his respective shift prior to the review. For the other IPT modules and any other training materials the review must include the Production Supervisor and any other persons he deems appropriate.

Training Coordinator is responsible for providing employees with a training survey to determine if the frequency of refresher training is adequate. Employee feed back from the survey will determine the frequency of training.

Each Area Engineer is responsible for providing updates to the IPT modules for his area as warranted.

The trainee's supervisor is responsible for documenting training and forwarding it to the Training Coordinator.

All employees are required to successfully complete all appropriate refresher training as indicated on the T-9 Training Checklists, the Operations C-9 Checklist and the LHC II Block Checklist. Refresher training will be required every three years.

Documentation

All training must be documented. The T-9 Training Checklists will be utilized to indicate what training is required of each employee as well as what has been received and when. Each supervisor is responsible for updating the T-9 checklist for his people when necessary. In addition most training will require some sort of testing to verify proficiency and competency. When verification of training is required such verification will be documented and kept on file for the period defined by the Records Retention Policy.

As mentioned previously, pilot courses may be recommended/required as a portion of a module. Pilot course material will be kept at LHC II but all pilot course tests will be administered by the Training Center.

Training documentation must include the following:

- Training module, pilot course, training course, etc.
- Employee name and master number
- Date of successful completion
- Trainer's name
- Required sign-offs

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All reviews of the training materials held by the Training Coordinator or Production Supervisor as outlined in the "Responsibilities" section must also be documented. Documentation will include the particular materials reviewed, the date they were reviewed and the names of all persons involved in the review.

Audits

Audits will be conducted by the US Area and division levels to monitor implementation rate, check compliance and recommend improvements.

References

Operating Discipline Standard for the Operating Units of Dow USA.

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