

CONDEA VISTA COMPANY CORPORATE SAFETY, HEALTH & ENVIRONMENT STANDARDS

Subject:	<u>Process Safety Management - Training</u>
Issue Date:	<u>March 22, 1996</u>
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Approved By:	<u>Harry D. Garrison</u> Manager Safety, Health & Environment

1 0 SCOPE

This standard applies to CONDEA Vista Company facilities covered by OSHA Process Safety Management. It addresses the training requirements specified in the OSHA Process Safety Management regulation 29 CFR 1910.119(g) which is specific to employee and contract operator training. Training specified by 1910.119(j), Mechanical Integrity, 1910.119(l), Management of Change and 1910.119(h), Contractors are not addressed by this standard unless the facility uses contract operators in which case, this standard applies.

2 0 PURPOSE

This standard specifies the minimum requirements that each covered facility must incorporate into their local training standard for Process Safety Management. The training required by this standard can be performed as part of training to meet other regulatory requirements, but the facility's training program documentation should specifically make note of that fact.

3 0 PSM REQUIREMENTS SPECIFIC TO OPERATOR TRAINING

3 1 Initial Training

Prior to beginning work or prior to assuming the duties of a new assignment in a covered process in a solo capacity (without direct supervision or assistance from a fully qualified and competent trainer or supervisor), operators must be initially trained and successfully complete the minimum training requirements specified by the operating procedures requirements of 1910.119(f) for their position. Training must include emphasis on the specific safety and health hazards, emergency operations including shutdown, and safe work practices applicable to the employee's job task.

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3 2 Refresher Training

3 2 1 Each facility must ensure that employees (CONDEA Vista and contractor) involved in operating a covered process understands and adheres to the current operating procedures of the process and must provide refresher training at least every three years, or more frequently if necessary

3 2 2 The appropriate frequency and scope of refresher training shall be determined through consultation between the facility management and the employees (CONDEA Vista and contractor) involved in operating the process

Such determinations should be based on observed or reported deviations from standard operating procedures, recent incidents, incident investigation recommendations, apparent deficiencies in training, audits, etc

A record of this consultation and the resulting determination shall be maintained indefinitely or until subsequent consultation/determinations occur. Each facility shall specify in their standard the job title(s) of the person(s) who will be responsible for maintaining this documentation

3 2 3 The time period for refresher training of an employee involved in operating a covered process is to be measured from the date of the employee's last training required by this standard or May 26, 1992 if "grandfathered" as permitted by 1910.119 (g)(1)(ii), whichever is later

3 2 4 The content of the refresher training shall parallel that required for initial training such that it includes the following applicable to the employee's job task

- a specific safety and health hazards,
- b emergency operations including shutdown,

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- c safe work practices, and
- d special emphasis on additions or changes to information or procedures made since the last initial or refresher training

Note Refresher training is considered an independent training requirement in addition to other training requirements of the OSHA PSM standard, therefore, training under "Management of Change" does not normally satisfy the refresher training requirement of this standard unless the refresher training covers the entire procedure --- not just the change. An example might be training provided following a new expansion or process change where the training provided for the change parallels that one would receive for initial training. When this occurs, it is strongly recommended that the training be documented as both - MOCA and Refresher or Initial training.

4 0 DOCUMENTATION AND RECORDKEEPING

- 4 1 Each facility shall, through some affirmative means ascertain that each employee (CONDEA Vista and contractor) involved in operating a covered process has received and understood the training required under this standard. This could include the administration of written tests, but may also include on-the-job demonstrations, or other methods as long as they are adequately documented.
- 4 2 Documentation shall include
 - 4 2 1 The identity of the employee (or contractor),
 - 4 2 2 The date of training,
 - 4 2 3 The means used to verify the employee understood training,
 - 4 2 4 The identity of the person(s) conducting the training and/or administering the verification of understanding,
 - 4 2 5 Results of testing, field demonstrations, etc

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- 4 2 6 Copies of course outlines, field demonstration requirements, blank tests or checklists, etc as appropriate to evidence the content of the training and verification, and
- 4 2 7 Any other documentation deemed pertinent by the facility
- 4 3 Training records for items 4 2 1 through 4 2 5 above as a minimum shall be maintained in a data base for the term of the person's employment
- 4 4 Documents in items 4 2 6 and 4 2 7 above shall be retained not more than five years
- 4 4 Each facility shall develop a Training compliance document that
 - a Defines the job positions of employees involved in the operation of the process that are subject to the training requirements of this standard
 - b Describes the process that will be used to ensure that all training required by this standard occurs in the time frame(s) specified
 - c Specifies who (by job title) will be responsible for various aspects of the training requirements including but not limited to maintenance of training records, advance notification that training is required, preparation of training materials, actual training, and verification of comprehension
 - d Specifies where training records are located for inspection