

COMPLIANCE CONNECTION

March / April / May 2020

Vol 4 Issue 2

A bimonthly newsletter designed to help you navigate the ins and outs of compliance and the safe practice of industrial refrigeration.

OSHA's Requirement for HAZMAT Hands-On Training

By: Debra Bennett, Ph.D.

Recently, I was asked a question in my class concerning HAZMAT computer-based training. Due to our current situation involving Sheltering in Place, the question seems eerily relevant.

The question was, "Are you going to start computer-based HAZMAT refresher training?" My response was that we would not be implementing a computer-based class. I followed up citing information from a letter I received from OSHA that frowned upon substituting a solely computer-based class.

Copied below is an excerpt from that letter issued by OSHA on August 16th, 2004:

August 16, 2004

Question: Is it possible to satisfy the requirements for 40 hours of classroom training solely through an on-line course, or would there need to be a supplemental portion of the training reserved for hands-on training in the use of personal protective equipment (PPE) and work practices by which an employer can minimize risks from hazards?

Answer: In OSHA's view, self-paced, interactive, computer-based training can serve as a valuable training tool in the context of an overall HAZWOPER training program. However, use of computer-based training by itself, would not be sufficient

to meet the intent of the standard's various training requirements.

Safety and health training may often involve the presentation of technical material to audiences who typically have not had formal education in technical or scientific disciplines, such as in areas of chemistry or physiology. In an effective training program, it is critical that trainees have the opportunity to ask questions where material is unfamiliar to them.

For HAZWOPER training, equally important is the use of hands-on experience and exercises to provide trainees with an opportunity to become familiar with equipment and safe practices in a non-hazardous setting. Many industrial operations, particularly hazardous waste operations, involve complex hazardous tasks and exposures. Traditional hands-on training ensures that workers are prepared to safely perform their job assignments. The purpose of hands-on training (i.e., in the donning and doffing of PPE) is two-fold: first, to ensure that workers have an opportunity to learn by practical experience and second, to assess whether workers have mastered the necessary skills. It is unlikely that sole reliance on a computer-based training program will accomplish these objectives.

In summary, OSHA believes that computer-based training programs can be useful as part of an effective safety and health training program to satisfy OSHA training requirements, provided the program is supplemented by the opportunity for trainees to ask questions of a qualified trainer, and gives trainees hands-on familiarity with personal protective equipment.

Although this letter is an older letter, the intent remains clear and is still relevant today. You must have an opportunity to ask job specific questions involving your plant or facility of the instructors, and you need hands-on training to ensure your employees are competent in the event of an emergency. Complete computer-based training will not satisfy these requirements.

What We Do ...

Process Safety Management

- PSM Program Workshop
- PSM Program Development
- Risk Management Program
- SOP/MOP Workshop

HAZMAT Training

- First Responder Training
- Emergency Responder
- HAZWOPER
- Incident Commander

Ammonia Refrigeration

- Refrigeration Operator
- Refrigeration Review Course
- Valve Tagging & Labeling
- RETA Exams

Safety Training & Services

- Emergency Action Plan
- Forklift Training
- Hazard Communication
- Lockout / Tagout



Industrial Consultants

Your Compliance Connection®

PO Box 833 • Owasso OK 74055
www.ammonia.com

Tel: 918-274-8639
FAX 918-274-8816
Email: info@ammonia.com



RAI
RETA
IAR



**Industrial
Consultants**

Your Compliance Connection™

2020 - 2021 TRAINING SCHEDULE

PO Box 833 • Owasso, OK 74055
Tel: 918-274-8639 • FAX: 918-274-8816

www.ammonia.com
Email: info@ammonia.com

JUNE 2020

KUILPSVILLE, PA

| | |
|------------|--------------------------|
| June 16-18 | 24 Hr Emergency Response |
| June 17 | 8 Hr ERT Refresher |
| June 18 | 8 Hr Incident Command |
| Apr. 24 | 8 Hr ERT Refresher |

JULY 2020

DELMAR, DE

| | |
|----------|--------------------------|
| July 7-9 | 24 Hr Emergency Response |
| July 8 | 8 Hr ERT Refresher |
| July 9 | 8 Hr ERT Refresher |
| July 10 | 8 Hr Incident Command |

WARRENVILLE, IL

| | |
|------------|--------------------------------------|
| July 21-24 | 32 Hr Level I Refrigeration Operator |
| July 21-23 | 24 Hr Emergency Response |
| July 23 | 8 Hr ERT Refresher |
| July 24 | 8 Hr Incident Command |
| July 24 | 8 Hr ERT Refresher |

AUGUST 2020

HURST, TX

| | |
|------------|-------------------------------|
| August 2-3 | 16 Hr CARO.CIRO Review Course |
|------------|-------------------------------|

SEPTEMBER 2020

CLIVE, IA

| | |
|-------------|--------------------------|
| Sept. 15 | 8 Hr ERT Refresher |
| Sept. 16-18 | 24 Hr Emergency Response |

PLYMOUTH, MN

| | |
|-------------|---------------------------|
| Sept. 22-24 | 24 Hr Emergency Response* |
| Sept. 24 | 8 Hr ERT Refresher* |
| Sept. 25 | 8 Hr Incident Command* |
| Sept. 25 | 8 Hr ERT Refresher* |

OCTOBER 2020

MECHANICSBURG, PA

| | |
|-------------|--------------------------|
| Sept. 28-30 | 24 Hr Emergency Response |
| Oct. 1 | 8 Hr ERT Refresher |
| Oct. 2 | 8 Hr ERT Refresher |

YUMA, AZ

| | |
|--------|--------------------|
| Oct. 6 | 8 Hr ERT Refresher |
|--------|--------------------|

WARRENVILLE, IL

| | |
|------------|--------------------------------------|
| Oct. 20-22 | 24 Hr PSM/RMP Workshop |
| Oct. 20-22 | 24 Hr Emergency Response |
| Oct. 20-23 | 32 Hr Level I Refrigeration Operator |
| Oct. 22 | 8 Hr ERT Refresher |
| Oct. 23 | 8 Hr Incident Command |
| Oct. 23 | 8 Hr ERT Refresher |

**Select class of interest
to access details and
registration information**

NOVEMBER 2020

MIDDLE RIVER, MD

| | |
|----------|--------------------------|
| Nov. 3-5 | 24 Hr Emergency Response |
| Nov. 4 | 8 Hr ERT Refresher |
| Nov. 5 | 8 Hr ERT Refresher |

HILLARD, OH

| | |
|------------|---------------------------|
| Nov. 11-13 | 24 Hr Emergency Response* |
| Nov. 13 | 8 Hr ERT Refresher* |

DECEMBER 2020

SANTA MARIA, CA

| | |
|----------|---------------------------|
| Dec. 7-9 | 24 Hr Emergency Response* |
| Dec. 10 | 8 Hr ERT Refresher* |
| Dec. 11 | 8 Hr ERT Refresher* |

DELMAR, DE

| | |
|--------|--------------------|
| Dec. 8 | 8 Hr ERT Refresher |
|--------|--------------------|

JANUARY 2021

WARRENVILLE, IL

| | |
|------------|--------------------------|
| Jan. 19-21 | 24 Hr Emergency Response |
| Jan. 21 | 8 Hr ERT Refresher |
| Jan. 22 | 8 Hr Incident Command |
| Jan. 22 | 8 Hr ERT Refresher |

FEBRUARY 2021

FT WAYNE, IN

| | |
|----------|--------------------------|
| Feb. 1-3 | 24 Hr Emergency Response |
| Feb. 4 | 8 Hr ERT Refresher |
| Feb. 5 | 8 Hr ERT Refresher |

PLYMOUTH, MN

| | |
|-----------|---------------------------|
| Feb. 9-11 | 24 Hr Emergency Response* |
| Feb. 11 | 8 Hr ERT Refresher* |
| Feb. 12 | 8 Hr Incident Command* |

* Special pricing applies to these classes

Cancellation Policy

Industrial Consultants reserves the right to cancel any course due to insufficient enrollment. Students enrolled in a cancelled course are entitled to a full refund or the payment may be transferred to another course. If you choose to withdraw from a course, you must do so no later than 15 days prior to the course start date. No refunds will be made if the student drops the course after this time. If you fail to cancel and do not attend the class, your payment will be forfeited, and may be subject to a cancellation fee. A person who is registered and is unable to attend, may at no additional cost, send a substitute.

About Us ...

Industrial Consultants, LLC is celebrating our third decade of service providing the training needs for companies like yours. Companies that must comply with health and safety regulations enacted by the Occupational Safety and Health Administration and the Environmental Protection Agency.

Industrial Consultants, LLC is focused on the cold storage and food industries, due to the large number of refrigeration systems using anhydrous ammonia, for which safety and health regulations are very strict. These regulations are ever changing, with nearly every aspect of your business being impacted by OSHA and EPA. Expertise is needed at all levels to ensure compliance. We continue to provide this expert assistance and guidance to help meet all your compliance needs.

We are totally dedicated to assisting you in achieving your compliance goals, taking the mystery out of compliance, and helping you gain control of your safety and training needs.

Let us be **Your Compliance Connection™**.

Compliance Without Confusion:

- Emergency Response Training
- Incident Commander Training
- Ammonia Refrigeration Training
- RETA CARO/CIRO/CRES Training
- Process Safety Management(PSM)
- Process Hazard Analysis(PHA)
- Compliance Audits
- EPA Risk Management Programs
- Safety Support Services
- Boiler Operator Training
- Plant Optimization Programs
- Mechanical Integrity Inspections

Each of these widely differing programs must meet specific OSHA and / or EPA requirements for training your operating and safety personnel. This is the essence of compliance. However, continuing annual compliance is certainly not simple. Industrial Consultants, LLC can take the mystery out of compliance and help you gain control of your safety and training needs.

We have been training safety and operating personnel for more than 30 years. Thousands have benefitted from our current, comprehensive, complete and accurate training. You may rely on Industrial Consultants, LLC to keep your organization current on the ever changing OSHA and EPA training requirement for your facility.

rev 05/15/20