

Safety and Environmental Management Systems (SEMS)	Revision Number:	1
	Revision Date:	2/16/14

(API RP 75 Element 7) § 250.1915 Training

Management must establish and implement training programs so that all personnel are trained to work safely and are aware of environmental considerations offshore, in accordance with their duties and responsibilities. This SEMS program establishes and implements a training program so that all personnel are trained to work safely and are aware of environmental considerations offshore, in accordance with their duties and responsibilities.

Training must address operating procedures (§ 250.1913), safe work practices (§ 250.1914), emergency response and control measures (§ 250.1918), Stop Work Authority (SWA) (§250.1930), Ultimate Work Authority (UWA) (§ 250.1931), Employee Participation Plans (EPP) (§ 250.1932), reporting unsafe working conditions (§ 250.1933), and how to recognize and identify hazards and how to construct and implement Job Safety Analysis (JSAs) (§ 250.1911). Qualifications of the instructors providing training must also be documented.

This SEMS program addresses:

Initial Training

Due to the nature of offshore operations, certain training elements should be provided for the basic well-being of personnel and protection of the environment. Appropriate initial training for OCS facilities include having:

1. All personnel receive orientation per API RP T1, Recommended Practice for Orientation Program for Personnel Going Offshore for the First Time (latest edition), before being given a task offshore for the first time.
2. All personnel regularly assigned offshore receive training in non-operating emergencies per API RP T4, Recommended Practice for Training of Offshore Personnel in Non-Operating Emergencies (latest edition), rescue of persons in the water per API RP T-7, Recommended Practice for Training of Personnel in Rescue of Persons in Water (latest edition), and fire fighting per API RP 14G, Recommended Practice for Fire Prevention and Control on Open Type Off-shore Production Platforms.
3. Appropriate personnel, regularly or occasionally assigned, as required by the circumstances, trained for safe work practices (e.g., hot work, hot tapping, safe entry, lockout/tagout), simultaneous operations planning, and hazards communication.
4. All regularly assigned personnel trained as appropriate in fire protection, lifesaving and survival instruction as per applicable portions of 33 CFR Parts 140-146.

This management program requires that qualification criteria be developed and implemented for operating and maintenance personnel. Procedures must be developed to ensure that persons assigned to operate and maintain the facility possess the required knowledge and skills to carry out their duties and responsibilities, including startup and shutdown. Some examples of appropriate maintenance training include:

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1. Safety and anti-pollution device training per API RP T-2, Recommended Practice for Qualification Programs for Offshore Production Personnel Who Work with Anti-Pollution Safety Devices (latest edition), and 30 CFR 250, Subpart 0 (latest revision) for those who maintain and test safety valves and controls.
2. Crane operation and maintenance training per API RP 2D, Recommended Practice for Operation and Maintenance of Offshore Cranes (latest edition), and 30 CFR 250.20(c) for those who operate platform cranes.
3. Well control training per API RP T-6, Recommended Practice for Training and Qualification of Personnel in Well Control Equipment and Techniques for Completion and Workover Operations on Offshore Locations:
 - API RP 59, Recommended Practices for Well Control Operations, and 30 CFR 250, Subparts E, F, H and O for drilling, completion, and workover personnel; safe drilling of wells containing hydrogen sulfide per,
 - API RP 49, Recommended Practices for Drilling and Drill Stem Testing of Wells Containing Hydrogen Sulfide, and 30 CFR 250, Subpart 0, if well target is to or through horizons suspected of containing hydrogen sulfide; production operations where hydrogen sulfide is known to be present per,
 - API RP 55, Recommended Practices for Oil and Gas Producing and Gas Processing Plant Operations Involving Hydrogen Sulfide, and 30 CFR 250, Subpart H.
4. Operating and maintenance training that utilize API recommended training modules and films, or equivalent, reinforced by appropriate demonstrations and "hands-on" training. Reinforcement through on-the-job training is permissible if under the supervision of a knowledgeable operating/maintenance person of proven performance.
5. If hydrogen sulfide is present at levels that require training (in excess of 20 PPM in the breathing atmosphere), appropriate training is required for all personnel, including visitors.
6. All regularly assigned personnel should be trained in environmental protection and pollution control as per applicable portions of 30 CFR 250, Subpart C.

Periodic Training

Periodic training to maintain understanding of, and adherence to, the current operating procedures is necessary, using periodic drills, to verify adequate retention of the required knowledge and skills.

Communication

Personnel must be informed of and trained as outlined in this section whenever a change is made in any of the areas of the SEMS program that impacts their ability to properly understand and perform their duties and responsibilities. Training and/or notice of the change must be given before personnel are expected to operate the facility.

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Specifically, management requires that whenever a change is made in the procedures recommended in Sections § 250.1913 (Element 5-Operating Procedures), § 250.1914 (Element 6-Safe Work Practices), or § 250.1918 (Element 10-Emergency Response and Control), personnel will be trained in or otherwise informed of the change before they are expected to operate the facility.

Contractor Training

Contractors must train their personnel in the work practices necessary to perform their jobs in a safe and environmentally sound manner. The training provided to contract personnel must include applicable site-specific safety and environmental procedures and rules pertaining to the facility and the applicable provisions of emergency action plans. Contractor’s individual training records must be verified, if contractors are performing operating duties, maintenance or repair, turnaround, major renovation, or specialty work at the facility.

At a minimum, all contract employees must show current OSHA/Regulatory or equivalent training prior to working at an OCS facility. Examples of this training may include:

Hazard Communication	Hydrogen Sulfide	Lockout/Tagout/Blockout
Confined Space Entry	Hot Work Permits	Fire Extinguishers
Rigger Training	Fall Protection	Personal Protective Equipment
Job Safety Analysis	Stop Work Authority	Ultimate Work Authority

Additional trade or craft skill training applicable to the job must be verified on site. Examples of trade/craft skill training may include crane operator and rigger training per API RP 2D, production safety system training and well control training per API and applicable subpart O requirements. Welder qualifications must also be verified prior to issuing any hot work permits for welding operations. Examples of likely welder qualifications include:

DOT Pipelines: Certifications of welders welding on DOT jurisdictional transmission piping or facilities must meet section III of API 1104 specifications, or other specifications defined in DOT Pipeline O&M procedures.

Pressure Vessels: Qualification and certification of welders welding on ASME Section I or Section IV boilers, or ASME Section VIII hydrocarbon vessels must meet ASME Boiler and Pressure Vessel Code, Section IX specifications.

Process Piping: Qualification and certification of welders welding on offshore platform process piping (ANSI B31.3 piping) must meet ASME Boiler and Pressure Vessel Code, Section IX specifications.

Structural: Certification of welders welding major structural members must meet AWS D1.1 specifications (Examples include: Deck beams, deck extensions, boat landing and structural supports).