

A CFR 1910 SOLUTION TO A MOBILE AND CHANGING WORK FORCE

Diana L. Manning
SERVS Fishing Vessel Coordinator
PO Box 109
Mail Stop 730
Valdez, AK 99686

Martin M. Parsons
SERVS Nearshore Response Coordinator
PO Box 109
Mail Stop 730
Valdez, AK 99686

Lou Weaver, CSP, SERVS TCC QA/Safety Manager
PO Box 109
Mail Stop 730
Valdez, AK 99686

ABSTRACT

Ship Escort Response Vessel System (SERVS) has a large contingency of fishing vessels, from Alaska coastal communities, on contract for specialized oil spill response. To Hazwoper train this vast, mobile and changing work force meant a 24-hour Hazwoper class and yearly refreshers for all crewmembers. SERVS found it difficult to keep records current on this mobile workforce. Federal Occupational Safety Health Association (OSHA) and SERVS made an alliance allowing SERVS to teach 24-hour Marine Hazwoper. The 24-hour Marine Hazwoper format keeps the fishermen current each year without the annual refresher or the detailed tracking of the 24-hour Hazwoper. The 24-hour Marine Hazwoper gives SERVS the flexibility to meet our Code of Federal Regulation (CFR) 1910 training demands and to directly structure the skills training.

SERVS wanted to develop a training program, which met Federal Regulations, was easy to track, and maintained a well-trained fishing vessel fleet.

SERVS, Federal and Alaska State OSHA developed a training regiment for SERVS and the Fishing Vessel Program. During the annual Fishing Vessel Training each spring and fall the fishermen are given 5 hours of classroom training. Four hours are devoted to regulatory requirements related to spills. The fifth hour builds on training they have already had or on a new subject. The remaining 20 hours are spent on water, training the fishing fleet in oil spill tactics. SERVS has two methods of checking the fleet's proficiency. The Equipment Proficiency Matrix allows SERVS to keep a detailed accounting of the equipment each fishing vessel/fishermen has operated. The Hazwoper Evaluation Matrix allows SERVS to evaluate each unit in the various on-water activities, assuring compliance with OSHA. The first roll out of 24 Hour Marine Hazwoper was Fall 2003. It successfully met the requirements of CFR 1910.

The 24 Hour Marine Hazwoper could be the answer to compliance of Federal Regulation for many organizations and companies, which are challenged by a mobile and changing work force. The 24 Hour Marine Hazwoper meets the needs of SERVS vast, mobile and changing fishing vessel fleet, which keeps our Fishing Vessel Program in compliance.

DISCUSSION

In 2001, OSHA unveiled publication #3172 "Training Marine Oil Spill Response Workers Under OSHA's Hazardous Waste Operations and Emergency Response Standard". The tremendous effort of bringing the guideline together took 10 years to complete and finally brought a user friendly, clear and concise direction for the OSROs to create and conduct Marine Hazwoper Training specifically designed for their unique working demands.

With the 3172 publication in hand TCC Limited Liability Company (TCC/llc), at Alyeska Pipeline Service Company (APSC) SERVS, started internal preparations of redesigning the tired and worn out classroom based Hazwoper training of which most of the Marine Fishing Vessel Responders had sat through for the last 11 years, it was time for a change. TCC contacted the Person-of-Contact, Sven Rudmen from the National Headquarters in Washington D.C for publication "3172" in the first steps of discussing the training curriculum for a strictly Hands-On program.

Bringing the development of the program to fruition came with the help of Randall White, OSHA's Alaska Area Manager, Dr. Roderick Hoffman, SERVS Regulatory & Preparedness Manager, and Gerald McDonald, TCC Director, who all signed the OSHA Marine Hazwoper Training Alliance. The Alliance was to conduct reality based training designed to show demonstrated competency in all of the areas outline in the OSHA "3172 guideline", by physically doing the training—not sitting in a classroom for 24 hours passing a test and being "certified" by a institution of higher education.

Since the writing of the abstract the program has evolved. This is another benefit of the Marine Hazwoper and SERVS alliance with OSHA. OSHA allows SERVS to tailor the program to its needs, the weather conditions and enables SERVS to use modern oil spill response technology for its 21st Century oil spill response

Each year TCC and SERVS conduct Marine Hazwoper direct hands-on training for 3 days to a large segment of commercial Fishermen and their very transient crewmembers with OSHA Participation. From the Fall of 2003, to the Fall of 2004, SERVS trained 390 commercial fishing permit holders and 1100 of their crewmembers. The annual Marine Hazwoper training sessions are conducted in the spring before the main fishing season and in the fall after the last of the fishing openers. The training is offered in

the Alaskan ports of Kodiak, Homer, Seward, Valdez, Cordova, Whittier and Chenega Bay.

The training program consists of multiple small groups attending the first day session with 2 hours of administrative and Regulatory interaction (one of the required training components) followed by a 3 hour in-door hands-on Gas Meter training program. Day 2 runs 10 hours, with 8 to 10 Training Element Stations (dependent on the number of people to train) staffed by Subject Matter Experts (SMEs) to coach and train the students to operating Gas Meters (field sampling), Skimmers, Power Packs, Pumps, decanting mini-barges, Boom deployments, and Anchor work. All training elements are embedded with operational ICS, designating Strike Team Leads and Task Force Leaders.

Day three is conducted on water. SERVS Operations Department uses tactics from the Prince William Sound Contingency Plan (PWSCP). Tactics are chosen from the various operational areas such as Open Water, Nearshore and Shoreline. The fishing vessel participants are dispatched to the designated on water drill site with the specific drill package for the area of operation. The drill package includes tactics from PWSCP, information about the area of operation, dates of drill, safety considerations and schedule of events.

To meet the eleven OSHA requirements the Hazwoper Evaluation Matrix is completed by Subject Matter Experts (SMES) in the field. Each fishing vessel is considered a unit. As a unit they are evaluated by the SMES and then the Hazwoper Evaluation Matrix and Equipment Proficiency Matrix is appropriately initialed denoting compliance with the OSHA Standard.

On-water operations include the assignment of ICS roles, equipment deployment, tactical training, and coping with Alaska's harsh environment. Training operations during inclement weather can prove hazardous. Adverse weather situations can and has shut down on-water operations causing SERVS to implement Plan "B". Plan "B" is a floor exercise conducted in a community hall or other location able to contain all the captains and their crews. During this floor exercise SERVS uses the identical drill packet that was to be used on water, provides a mock up of the area and sets in place the ICS structure necessary to continue the training. All participants are assigned roles and the exercise proceeds as if it were on water using wooden mock ups of vessels, ribbon for boom and vests for identifying ICS players; i.e. Group Supervisor, Staging Manager, Incident Commander.

Once the on-water or Plan "B" is completed a debrief is conducted to formulate lessons learned and capture ideas to improve the 24 Hr. Marine Hazwoper Program.

CONCLUSION

The 24 Hr. Marine Hazwoper keeps SERVS' Fishing Vessel Program in compliance. The new training has had acceptance by all the principle parties involved. This includes our regulators, stakeholders, the fishermen, and SERVS Management.

The method of compliance is agreeable to our regulating agencies. One such agency is the Alaska Department of Environ-

mental Conservation (ADEC) which is exceptionally supportive and encouraged with the outcome of the new training program. Matt Pauli, OSHA Region X, Anchorage office, stated that SERVS 24 Hr. Marine Hazwoper is the most effective training alliance in the United States for 2004.

The fishing vessel community is ecstatic and appreciative of the new training program. This is reflected in their evaluations of the various elements of the 24 Hr. Marine Hazwoper Training. The fishermen have provided SERVS with copious comments proclaiming their satisfaction with the new training program.

SERVS has a more favorable relationship with the fishermen, who are an individualistic and diverse group of business people. The tailored training appeals to the fishermen because they can use the training in their everyday lives as fishermen. Each segment of the Fishing Vessel training has an element which improves safety in one of Alaska's most dangerous occupations, fishing. Examples of selected elements of the training are: Rigging operation/sling inspection, safety training, handling of injured co-workers, and safe towing operations.

From Fall 2003, to Fall 2004, no fishing vessel had to call for a mechanic to help them set up or operate the selected oil spill equipment on board their vessel. This could be directly attributed to the advanced Hands-On training the fishermen received during the 24 Hr. Marine Hazwoper Program.

The 24 Hour Marine Hazwoper could be the answer to compliance of Federal Regulation for many organizations and companies, which are challenged by a mobile and changing work force. The 24 Hour Marine Hazwoper meets the needs of SERVS vast, mobile and changing fishing vessel fleet, which keeps our Fishing Vessel Program in compliance.

BIOGRAPHY

Diana L. Manning has worked in the oil spill recovery and prevention arena for 10 years. During her tenure at Alyeska Pipeline Service Company (APSC) Diana was a pump station operator, a mechanical maintenance technician, berth operator-loading supertankers, a SERVS Response Coordinator, and is currently the Fishing Vessel Coordinator.

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