APPENDIX C TO PART 155—TRAINING ELEMENTS FOR OIL SPILL RESPONSE PLANS

1. General

1.1 The portion of the plan dealing with training is one of the key elements of a response plan. This concept is clearly expressed by the fact that Congress, in writing the Oil Pollution Act of 1990, specifically included training as one of the sections required in a vessel or facility response plan. In reviewing submitted response plans, it has been noted that the plans often do not provide sufficient information in the training section of the plan for either the user or the reviewer of the plan. In some cases, plans simply state that the crew and others will be training in their duties and responsibilities, with no other information being provided. In other plans, information is simply given that required parties will receive the necessary worker safety training (HAZWOPER).

1.2 The training section of the plan need not be a detailed course syllabus, but it must contain sufficient information to allow the user and reviewer (or evaluator) to have an understanding of those areas that are believed to be critical. Plans should identify key skill areas and the training that is required to ensure that the individual identified will be capable of performing the duties prescribed to them. It should also describe how the training will be delivered to the various personnel. Further, this section of the plan must work in harmony with those sections of the plan dealing with exercises, the spill management team, and the qualified individual.

1.3 The material in this appendix C is not all-inclusive and is provided for guidance only.

2. Elements To Be Addressed

2.1 To assist in the preparation of the training section of a vessel response plan, some of the key elements that should be addressed are indicated in the following sections. Again, while it is not necessary that the comprehensive training program for the company be included in the response plan, it...
is necessary for the plan to convey the elements that define the program as appropriate.

2.2 An effective spill response training program should consider and address the following:

2.2.1 Notification requirements and procedures.

2.2.2 Communication system(s) used for the notifications.

2.2.3 Procedures to mitigate or prevent any discharge or a substantial threat of a discharge of oil resulting from:

2.2.3.1 Operational activities associated with internal or external cargo transfers;

2.2.3.2 Grounding or stranding;

2.2.3.3 Collision;

2.2.3.4 Explosion or fire;

2.2.3.5 Hull failure;

2.2.3.6 Excessive list; or

2.2.3.7 Equipment failure.

2.2.4 Procedures and arrangements for emergency towing.

2.2.5 When performing shipboard mitigation measures—

2.2.5.1 Ship salvage procedures;

2.2.5.2 Damage stability; and

2.2.5.3 Hull stress considerations.

2.2.6 Procedures for transferring responsibility for direction of response activities from vessel and facility personnel to the spill management team.

2.2.7 Familiarity with the operational capabilities of the contracted oil spill removal organizations and the procedures to notify and activate such organizations.

2.2.8 Familiarity with the contracting and ordering procedures to acquire oil spill removal organization resources.

2.2.9 Familiarity with the Area Contingency Plans.

2.2.10 Familiarity with the organizational structures that will be used to manage the response actions.

2.2.11 Responsibilities and duties of the spill management team members in accordance with designated job responsibilities.

2.2.12 Responsibilities and authority of the qualified individual as described in the vessel response plan and company response organization.

2.2.13 Responsibilities of designated individuals to initiate a response and supervise shore-based response resources.

2.2.14 Actions to take, in accordance with designated job responsibilities, in the event of a transfer system leak, tank overflow, or suspected cargo tank or hull leak.

2.2.15 Information on the cargoes handled by the vessel or facility, including familiarity with:

2.2.15.1 Cargo material safety data sheets;

2.2.15.2 Chemical characteristics of the cargo;

2.2.15.3 Special handling procedures for the cargo;

2.2.15.4 Health and safety hazards associated with the cargo; and

2.2.15.5 Spill and firefighting procedures for the cargo.

2.2.16 Occupational Safety and Health Administration requirements for worker health and safety (29 CFR 1910.120).

3. Further Considerations

In drafting the training section of the response plan, some further considerations are noted below (these points are raised simply as a reminder):

3.1 The training program should focus on training provided to vessel personnel.

3.2 An organization is comprised of individuals, and a training program should be structured to recognize this fact by ensuring that training is tailored to the needs of the individuals involved in the program.

3.3 An owner or operator may identify equivalent work experience which fulfills specific training requirements.

3.4 The training program should include participation in periodic announced and unannounced exercises. This participation should approximate the actual roles and responsibilities of individuals as specified in the response plan.

3.5 Training should be conducted periodically to reinforce the required knowledge and to ensure an adequate degree of preparedness by individuals with responsibilities under the vessel response plan.

3.6 Training may be delivered via a number of different means; including classroom sessions, group discussions, video tapes, self-study workbooks, resident training courses, on-the-job training, or other means as deemed appropriate to ensure proper instruction.

3.7 New employees should complete the training program prior to being assigned job responsibilities which require participation in emergency response situations.

4. Conclusion

The information in this appendix is only intended to assist response plan preparers in reviewing the content of and in modifying the training section of their response plans. It may be more comprehensive than is needed for some vessels and not comprehensive enough for others. The Coast Guard expects that plan preparers have determined the training needs of their organizations created by the development of the response plans and the actions identified as necessary to increase the preparedness of the company and its personnel to respond to actual or threatened discharges of oil from their vessels.

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