Task Training: Plans, Procedures, and Records

DMME
Division of Mineral Mining
VTCA Safety Seminar
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Virginia Law Requires Task Training

- 45.1-161.292:73., States in part:
  - A. Each operator shall have a plan containing … training for miners for new tasks.
  - B. Plans shall be available to the Director for review upon request.

* Note: The law says, “each operator”. It is important to understand that contractors are, or may be, operators too!
Virginia Safety and Health Regulations Are Specific

• 4VAC25-40-100. Employee Training
  – “New or reassigned employees shall be trained in state and company safety regulations and be task trained prior to being assigned a task or duty. Records of training shall be kept in writing at the mine site for two years or 60 days after termination of employment.”

• 4VAC25-40-190. Compliance With Regulations
  – “Miners shall comply with all state safety and health regulations applicable to their task or duty.”
Regulations Referring To Specific Tasks

• 4VAC25-40-630. Training and Practice Drills
  – “All employees assigned to firefighting responsibilities by the operator shall be trained in firefighting and practice drills shall be conducted at least every six months.”

• 4VAC25-40-800.B. Use of Explosives
  – “Persons who assist in blasting activities shall be under the direct supervision of the certified blaster in charge and shall be alerted to the hazards involved.”

* Records of these types of task training must be kept as well.
Miners assigned a new task must receive training in the health and safety aspects specific to that task prior to performing that task.

Task training applies to any new or modified equipment or procedures.

Training must be presented in a language understood by the miners receiving the training.
Parts 46 & 48, cont.

• Call for close supervision, by a competent person, of practice with equipment (non-production and production conditions) or procedures and training regarding safety and health and safe work procedures specific to the task.

• A “competent person” is required for all Part 46 training and is acceptable for task and hazard training under Part 48. All other training under Part 48 requires MSHA approved instructors.
Task Training Plans
DMME/DMM

• All training plans must be written. The form or format used is up to the operator as long as the information required by law is present and maintained.

• The plan must indicate:
  – That a certified foreman, competent person or person experienced and familiar with the task will provide instruction and oversee practice of the assigned task at suitable non-production and production locations at the mine site.
  – The training will cover potential hazards and safety regulations associated with the assigned task, manufacturer’s operating instructions/procedures and the company expectations for work practices to be carried out.
Task Training Plans
Part 46 & 48

• All plans must be written. Plans under Part 48 must be approved by the appropriate MSHA district office (Warrendale, PA.).
  – DMM recommends that all operators/contractors get their plans approved by MSHA regardless of whether they are under Part 46 or 48.

• The exact form or format used for the plan does not matter as long as the required information is there.
Training Plan Cover Sheet
Acceptable to DMM and MSHA

- The cover sheet must include the company name, mine name and MSHA ID number. *Each mine with an ID number must have a separate plan.* If the plan is for a contractor, then the independent contractor ID number must be shown, if they have one. ID number is not required for plan approval.

- Also to include the name and position of the person responsible for health and safety training at the mine or for the contractor.
Instructors and Areas of Competence

- A list of instructors and the areas/subjects they are competent to teach is required.
- If an outside training firm is to be used, the company name and subjects to be covered is required.
Training Plan by Task

• Each task must be specified/named.

• Teaching methods must be indicated:
  – Lectures, audiovisual, demonstrations and/or closely supervised practice.

• Training materials:
  – MSHA or DMM (safety and health regulations), company rules, operator’s manuals or other manufacturer supplied materials (films).

• Evaluation procedures:
  – Oral, written or observation.
Training Plan by Task, cont.

- This indicates other tasks that may need training associated with a primary task, or changes in the task. For example:
  - You list operator of a 980G loader. Beyond that you may want to list training for fueling equipment or changing fluids separately.
  - The manufacturer changes recommendations.
Other Tasks Training Plan

- You list information for the other tasks in the same way you do for the primary tasks.
Job Descriptions and Tasks

- A site specific master list of jobs and tasks that training must be provided for is required.
Training Procedures

• Individual operations, tasks and instructors will largely determine the actions and the order in which they are accomplished. *This is a suggested scenario only.*

• You may wish to begin in a class room setting covering the safety and health aspects of the task using various printed materials (MSHA, DMM and company rules and regulations).

• Printed material might be assigned for self study or given out for future reference.
Training Procedures (2)

• A center piece of the printed materials used would be the operator’s manual if the training is for a stationary or mobile equipment operator.

• Any material/information supplied by the manufacturer should be referenced. This would apply to the largest equipment and all the way down to hand tools.
Training Procedures (3)

- Films on DVD, whether generic ones as supplied by MSHA or DMM or those available from equipment manufacturers, are excellent training tools.
- Many manufacturers will supply training films at the time of new equipment delivery. Other specific topics are available at their web sites (for example: safety.cat.com).
Training Procedures (4)

• The people most competent to teach specific operational practices may be individuals supplied by the manufacturer or distributor of the equipment. These individuals might provide training for other personnel besides the operator, such as, maintenance and repair personnel and electricians.
Training Procedures (5)

- However and whenever appropriate in the process, equipment pre-operational inspection, work area inspection and safe operating procedures specific to the task/equipment must be covered with the trainee.
Training Procedures (6)

• Other topics secondary to the primary task that must be covered might include:
  – Hazardous materials handling*
  – PPE requirements
  – Lock out/tag out programs

* Separate from Part 47 training.
Observation/Evaluation

• At the end of the training process there must be a way to ensure that the training has been successful and the trainee is ready to perform the new task (s) on their own:
  – Observation of task performance in practice and production settings.
  – Proper evaluation might require a written or verbal exam.
The Plan

• The task:
  – Operator, Caterpillar 980H wheel loader.

• Teaching Methods:
  – Lecture/discussion
  – Audiovisual
  – Demonstration
  – Supervised practice

• Teaching Materials:
  – Va. Safety and Health Regulations For Mineral Mining, Part IX (mobile equipment)
  – MSHA 30CFR, Part 56
  – Company policies/handbook
  – CAT 980H Operators Manual
  – CAT film, “980H Operator Training”

• Evaluation Method:
  – Oral examination
  – Observation

• Duration of training:
  – 8 to 24 hours ???????
  (This will depend on the specific job and employee needs)
For Example....
The Training

• Based on the training plan on the previous slide:
  – A “competent person”, begins by covering state, federal and company regulations related to wheel loaders/mobile equipment. Ground control and/or other areas of the regulations may need to be covered.
  – Next, refer to the operators manual to cover basic machine operation and functions.

• The 980H operators training film should be shown at this point.

• This is the time to move to the loader itself:
  – Introduce a factory/dealer trainer (if used) that will teach machine specifics.
  – After a general introduction to the machine, how to perform a pre-operational inspection should be taught.
  – The trainee should be instructed in proper procedures involving start-up and moving the machine.
  – In a non-production setting, machine operation is fully demonstrated to the trainee. They are then given “hands-on” instruction and allowed to practice operating the machine.
The Training, cont.

• When deemed appropriate, training should move to the normal production area for the machine:
  – In this setting, machine operation should be fully demonstrated to the trainee once again.
  – Site specific issues regarding ground control, other equipment or personnel working in the area and etc. should be covered.
  – The trainee is given “hands-on” instruction and then allowed to practice operating the machine.
  – Any remedial training necessary is given.

• Final evaluation, per the plan, consists of oral examination and observation:
  – Throughout the training, and at the end, the trainee is quizzed on proper procedures.
  – The trainer’s observations should include:
    • The trainee performing a pre-operational inspection.
    • The trainee operating the loader in all areas of operation.
    • The trainee performing any and all tasks related to operating the loader.
Recordkeeping

- MSHA’s 5000-23 form may be used (required under part 48, unless an alternative is specifically approved).
Recordkeeping (2)

- Regardless of the form, the following information must be present:
  - Printed full name of the person receiving training.
  - Type and date of training.
  - Name of the competent person providing the training.
  - Mine or independent contractor name and MSHA ID number.
  - Location of training.
  - The statement, “False certification is punishable under section 110 (a) and (f) of the Federal Mine Safety and Health Act”, must be printed in bold letters and in a conspicuous manner.
  - The statement, “I certify that the above training has been completed”, signed by the person designated in the training plan as being responsible for health and safety.
  - The trainee should sign the form and receive a copy (required under Part 48).
Recordkeeping (3)

- This is a MSHA suggested form that can be used instead of, or with, the 5000-23 under Part 46.
- Note that it contains all of the required information stated earlier and in the 5000-23 form (except trainee signature which is not required under Part 46).
Recordkeeping (4)

- A form like this is useful when creating a beginning record for a miner:
  - The top area covers the tasks the miner is currently qualified to perform.
  - The bottom section is for new tasks or duties moving forward from a given date.

- The 5000-23 form, or the equivalent, as previously shown supports this form if used.
Recordkeeping (5)

• A group record is useful as a quick reference, especially in tracking a small number of employees and tasks.

• Some small operators have a wall poster or blackboard set up so this basic information is readily available.
Fire Fighting Training/Practice

- Not normally discussed with task training, however, it is a task requiring training and practice on a regular basis (every 6 months).
- A record of training and practice must be kept. The form shown is a suggestion only.
Quarry Shot Loading Personnel

- As shown earlier, state regulations specifically require training for those persons helping to load a shot.
- The person most competent to provide this training would be the certified blaster in charge of shots at the mine.
- This training must be documented and a record kept just as with all other training.
Record Retention and Availability

• State regulation 4VAC25-40-100 requires records of training to be kept for 2 years or 60 days after termination of employment.
  – Do not be mislead by this, training and updating records is an ongoing process. The 2 years mentioned in the regulation is a sliding window showing the most recent 2 years of training.

• MSHA says training records are to be in writing with original versions kept by the mine operator, or independent contractor, and made available to MSHA inspectors, State inspectors, miners and miner’s representatives.
Operator and Contractor Responsibility

• It is the operator’s and contractor’s responsibility to review the laws and regulations and maintain all required plans and records.

• The materials illustrated and suggestions made in this presentation, or any other by DMM, do not relieve the operators and contractors from this responsibility in any way.
Summary

• It is the mine operator’s and contractor’s responsibility to review laws and regulations and maintain the required plans and records.

• DMM recommends operators and contractors seek MSHA approval of training plans whether under Part 46 or 48.

• DMM and MSHA Part 46 do not require specific forms for plans and records, but specific information must be kept in writing. Go to, www.msha.gov/training/part46 or, www.dmme.virginia.gov/dmm/lawsandregulations for more help.

• Competent people must provide the training.
• State laws and regulation and company rules that apply to the task must be a part of the training as well as the health and safety aspects specific to the task.

• Training records must be kept for 2 years or 60 days after termination of employment.

END