



Managing Sub M Audit and Survey Training Requirements

Train, Track, Report

Sept. 27, 2019 – MITAGS
Subchapter M Conference



Today's Agenda

- Introduction
- Health & Safety Plan - HSP
- Sub M Training Requirements
- Training Methods
- Training Program Resources



Company Overview

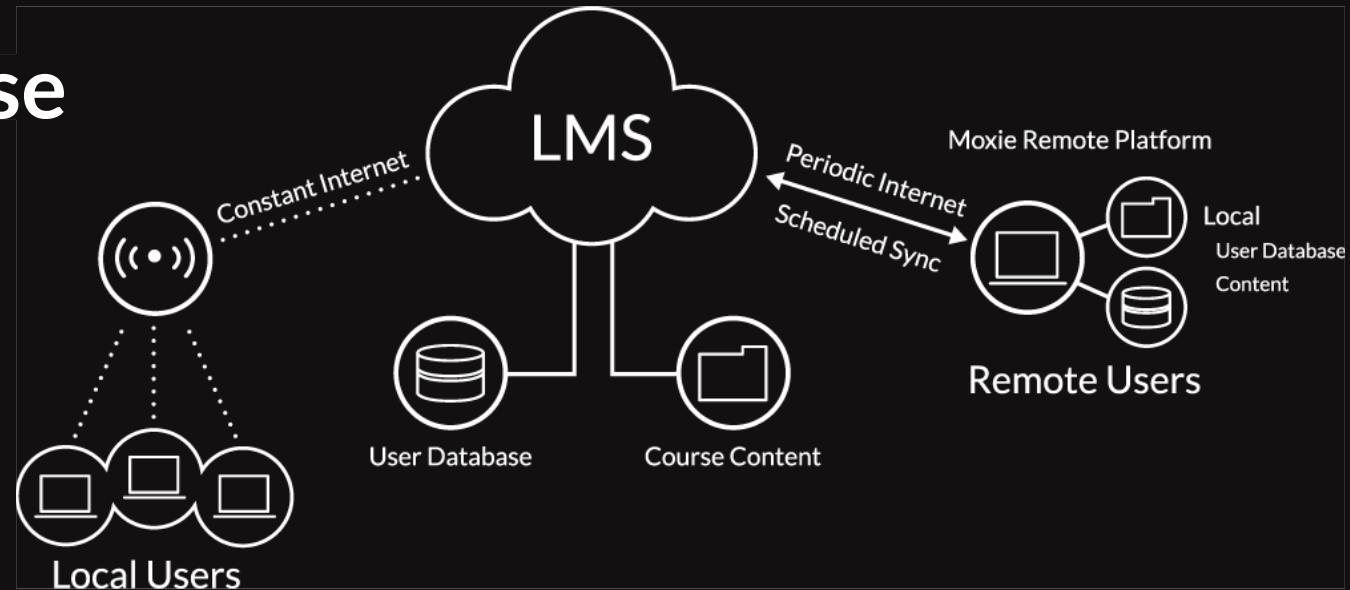
- 33 Years in Business
- New Orleans & Houston
- Producer of Maritime Training Programs
- eLearning, DVDs, Manuals, Safety & Security Signs
- Hosted LMS, Curriculum Development, Custom Production





LMS Customer Market Base

- over 50 Maritime LMS customers
- over 30,000 Maritime Employees
- over 200 Maritime Courses
- over 500 additional Industry & Regulatory Courses



A large red barge loaded with red containers, being pushed by a tugboat on a river. The tugboat is at the front, and the barge is filled with many red containers. The water is dark, and there is a small island with green trees on the right side.

Health and Safety Plan (HSP)

On or before July 22, 2019, owners and managing operators of Subchapter M towing vessels must implement a Health and Safety Plan (HSP) and the associated record-keeping procedures regardless of whether or not the vessel has been issued a Certificate of Inspection

Health and Safety Plan (HSP)

- Towing vessels operating under a Safety Management System (SMS) may already have the elements of the HSP covered within the SMS
- Towing vessels utilizing the Coast Guard inspection option, the HSP would likely be a stand-alone document
- No requirement to submit the HSP to the USCG or TPO for approval
- Plan is subject to review during inspections and audits





■ Health and Safety Plan (HSP)

- General Health and Safety Procedures
- Identification and Mitigation of Health and Safety Hazards
- Health and Safety Training for Crewmembers and Non-Crewmembers

46 CFR Subchapter M Training Requirements

Subpart E: Safety and Health



§140.500	(a) The Health And Safety Plan must document compliance with this part and include recordkeeping procedures.
	(b) Ensure that all persons on board a towing vessel comply with the health and safety plan.

46 CFR Subchapter M Training Requirements

Subpart E: General Health and Safety Requirements



§140.505	a) Implement procedures for reporting unsafe conditions and have records of the activities conducted under this section.
	(a) Maintain records of health and safety incidents that occur on board the vessel, including any medical records associated with the incidents.

46 CFR Subchapter M Training Requirements

Subpart E: General Health and Safety Requirements



§140.505

(b) All vessel equipment must be used in accordance with the manufacturer's recommended practice and in a manner that minimizes risk of injury or death

(b) Includes machinery, deck machinery, towing gear, ladders, embarkation devices, cranes, portable tools, and safety equipment.

46 CFR Subchapter M Training Requirements

Subpart E: General Health and Safety Requirements



§140.505

(c) All machinery and equipment that is not in proper working order (including missing or malfunctioning guards or safety devices) must be removed; made safe through marking, tagging, or covering; or otherwise made unusable.

46 CFR Subchapter M Training Requirements

Subpart E: General Health and Safety Requirements



§140.505

(d) Personal Protective Equipment (PPE) must be made available and on hand for all personnel engaged in an activity that requires the use of PPE.

- Suitable for the vessel's intended service
- Meet the standards of 29 CFR part 1910, subpart I
- Used, cleaned, maintained, and repaired in accordance with manufacturer's requirements.

46 CFR Subchapter M Training Requirements

Subpart E: General Health and Safety Requirements



§140.505

(3) All individuals must wear PPE appropriate to the activity being performed;

(4) All personnel engaged in an activity must be trained in the proper use, limitations, and care of the PPE

(e) The vessel, including crew's quarters and the galley, must be kept in a sanitary condition.

46 CFR Subchapter M Training Requirements

Subpart E: Identification and Mitigation of Health and Safety Hazards



§140.505

(a) The owner must implement procedures to identify and mitigate health and safety hazards, including:

(1) Tools and equipment, deck machinery, rigging, welding and cutting, hand tools, ladders, and abrasive wheel machinery found on board the vessel

46 CFR Subchapter M Training Requirements

Subpart E: Identification and Mitigation of Health and Safety Hazards



<p>§140.505</p>	<ul style="list-style-type: none">(2) Slips, Trips, And Falls;(3) Working Aloft;(4) Hazardous Materials;(5) Confined Space Entry;(6) Bloodborne Pathogens and other biological hazards;
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46 CFR Subchapter M Training Requirements

Subpart E: Identification and Mitigation of Health and Safety Hazards



§140.505

(7) Electrical;

(8) Noise;

(9) Falls overboard;

(10) Vessel embarkation and disembarkation (including pilot transfers);

46 CFR Subchapter M Training Requirements

Subpart E: Identification and Mitigation of Health and Safety Hazards



<p>§140.505</p>	<p>(11) Towing gear, including winches, capstans, wires, hawsers and other related equipment;</p> <p>(12) Personal hygiene;</p> <p>(13) Sanitation and safe food handling; and</p> <p>(14) Potable water supply</p>
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140.510 (a) (12) Requires The Implementation Of Procedures To

- Identify And Mitigate Personal Hygiene Hazards
- Identify And Mitigate Sanitation And Safe Food Handling Hazards



46 CFR Subchapter M Training Requirements

Subpart E: Identification and Mitigation of Health and Safety Hazards



§140.505

(b) As far as practicable, the owner or managing operator must implement other types of safety control measures before relying on Personal Protective Equipment. These controls may include administrative, engineering, source modification, substitution, process change or controls, isolation, ventilation, or other controls.

Sub M Training Requirements

TSMS Must Contain Personnel Training for:

- New-hire Orientation
- Duties Associated with TSMS Execution
- Operational Duties
- Emergency Procedures
- Occupational Health
- Crew Safety
- Additional Required Trainings



46 CFR Subchapter M Training Requirements

Safety Orientation

§138.220 (b) (2)	Requires that a TSMS contain a personnel training policy for: new-hire orientation, duties associated with TSMS execution, operational duties, emergency procedures, occupational health, crew safety, and additional required trainings.
§140.410 (d)	Documentation of safety orientations and other training, including date, general description topics, and names/signatures of individuals providing and receiving the safety orientation or training.

(b) Prior to getting underway for the first time on a particular towing vessel, each crewmember must receive a safety orientation.



140.410 Safety Orientation Documentation

- Must be documented according to TSMS.
- The date of the safety orientation or training;
- A general description of the safety orientation or training topics;
- The name(s) and signature(s) of individual(s) providing the orientation or training; and
- The name(s) of the individual(s) receiving the safety orientation or training.

46 CFR Subchapter M Training Requirements

Subpart E: Training Requirements



§140.515

(e) The owner, managing operator, or master must determine the appropriate training and information to provide to each individual permitted on the vessel who is not a crewmember, relative to the expected risk exposure of the individual.

46 CFR Subchapter M Training Requirements

Subpart E: Orientation for individuals that are not crewmembers (Visitors & Contractors)



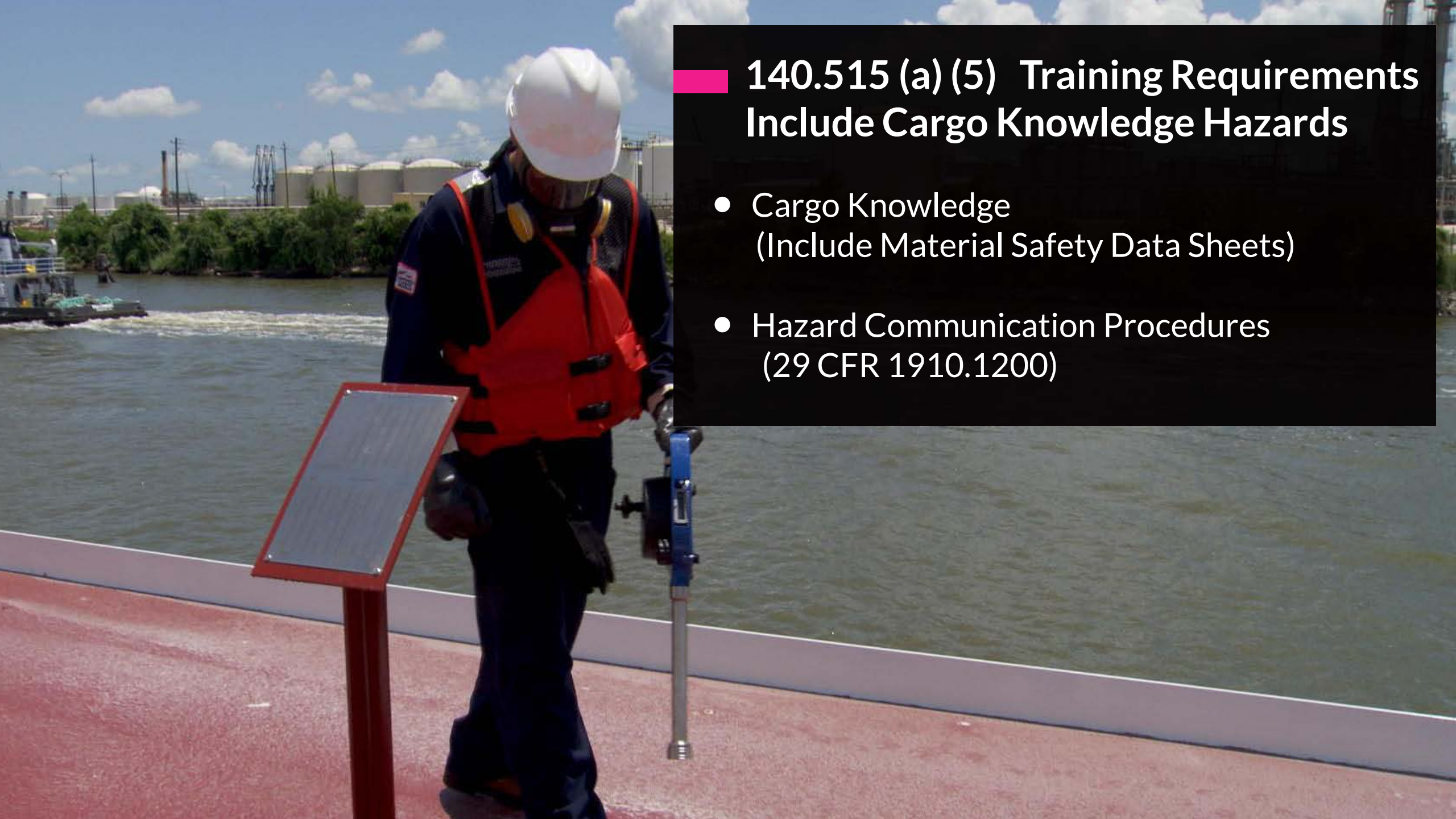
<p>§140.505</p>	<p>Individuals, who are not crewmembers must receive a safety orientation prior to getting underway or as soon as practicable thereafter, to include:</p> <ul style="list-style-type: none">(a) The location, operation, and use of lifesaving equipment;(b) Emergency procedures;(c) Methods to notify crewmembers in the event of an emergency(d) Prevention of falls overboard.
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Initial Crew Safety Curriculum

§140.515(a)(1) – (9) No later than 5 days after employment

- Crew Safety Orientation
- Hazard Communication
- Confined Spaces
- Respiratory Protection
- Lockout Tagout
- Marine Fire Fighting and Prevention



140.515 (a) (5) Training Requirements Include Cargo Knowledge Hazards

- Cargo Knowledge
(Include Material Safety Data Sheets)
- Hazard Communication Procedures
(29 CFR 1910.1200)

46 CFR Subchapter M Training Requirements

Subpart E: Training Requirements



§140.515

(c) Crewmember training required by this section must be conducted as soon as practicable, but **not later than 5 days after employment.**

46 CFR Subchapter M Training Requirements

Subpart E: Training Requirements



§140.515

(a) All crewmembers must be provided with health and safety information and training that includes:

(1) Content and procedures of the owner or managing operator's Health And Safety Plan;

46 CFR Subchapter M Training Requirements

Subpart E: General Health and Safety Requirements



§140.505

(a) The Health And Safety Plan must document compliance with this part and include recordkeeping procedures.

(b) The owner, managing operator, or master must ensure that all persons on board a towing vessel comply with the health and safety plan.

46 CFR Subchapter M Training Requirements

Requirement for training crews to respond to fires

§140.420 (g)	Records of emergency drills and instruction, including date, description of drill, and personnel involved. TSMS users may use alternate means of instruction, such as an electronic format, to satisfy requirements.
§142.245	Explains crew firefighting training requirements, including master's responsibility to ensure each crewmember participates in firefighting drills and receives instruction at least once a month.

142.245 Fire Fighting Drills and Instruction

- Fight a fire in the engine room
- Operate all fire extinguishing equipment
- Stop mechanical ventilation system to prevent leakage of extinguishing agent
- Operate Fuel Shut-offs
- Activate General Alarm
- Don firefighters outfit and SCBA
- Crewmembers must receive a safety orientation on above items within 24 hours of reporting for duty



46 CFR Subchapter M Training Requirements

Subpart E: Training Requirements



§140.515

(2) Procedures for reporting unsafe conditions;

(3) Proper selection and use of PPE appropriate to the vessel operation;

(4) Safe use of equipment including deck machinery, rigging, welding and cutting, hand tools, ladders, and abrasive wheel machinery found onboard the vessel;

46 CFR Subchapter M Training Requirements

Subpart E: Training Requirements



§140.515

(5) Hazard communication and cargo knowledge;

(6) Safe use and storage of hazardous materials and chemicals;

(7) Confined space entry;



Environmental Policy, Procedures and Training Requirements

- 138.215 Company Environmental Policy
- 140.655 Requirements To Prevent Oil And Garbage Pollution
- 140.655(b) Capabilities For Preventing Oil Spills During Transfers Including Fuel Transfer Procedures & DOI
- 140.515(a)(5) Training Requirements Include Cargo Knowledge For
- Benzene Procedure
- Vapor Control Procedures
- Cargoes Requiring Special Handling (E.G., Anhydrous Ammonia, Hydrogen Sulfide, Etc.)

46 CFR Subchapter M Training Requirements

Subpart E: Training Requirements



<p>§140.515</p>	<p>(8) Respiratory protection</p> <p>(9) Lockout/Tagout procedures.</p>
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140.510 Requires Procedures To Identify And Mitigate Safety Hazards

- Noise
- Slips, Trips, And Falls
- Confined Space Entry
- Hazardous Materials.
- Storage Of Flammable Or Combustible Products
- Personal Protective Equipment Requirements



46 CFR Subchapter M Training Requirements

Subpart E: Training Requirements



§140.515

(d) Refresher training **must be repeated annually** and may be conducted over time in modules covering specific topics. Refresher training may be less comprehensive, provided that the information presented is sufficient to provide employees with continued understanding of workplace hazards.

46 CFR Subchapter M Training Requirements

Recordkeeping

§140.915	Details requirements for recordkeeping of training records. Safety orientation, drills, exams and tests, navigation assessment, navigation safety training, oil discharge, inspections, fire-detection
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Training Methods

- Vessel and Shore Based Learning Management System – *Train, Track & Report*
- Hands On Training – Drills, Mentoring, Skills Assessment
- Classroom and Simulator Based Training

■ Learning Management System (LMS)





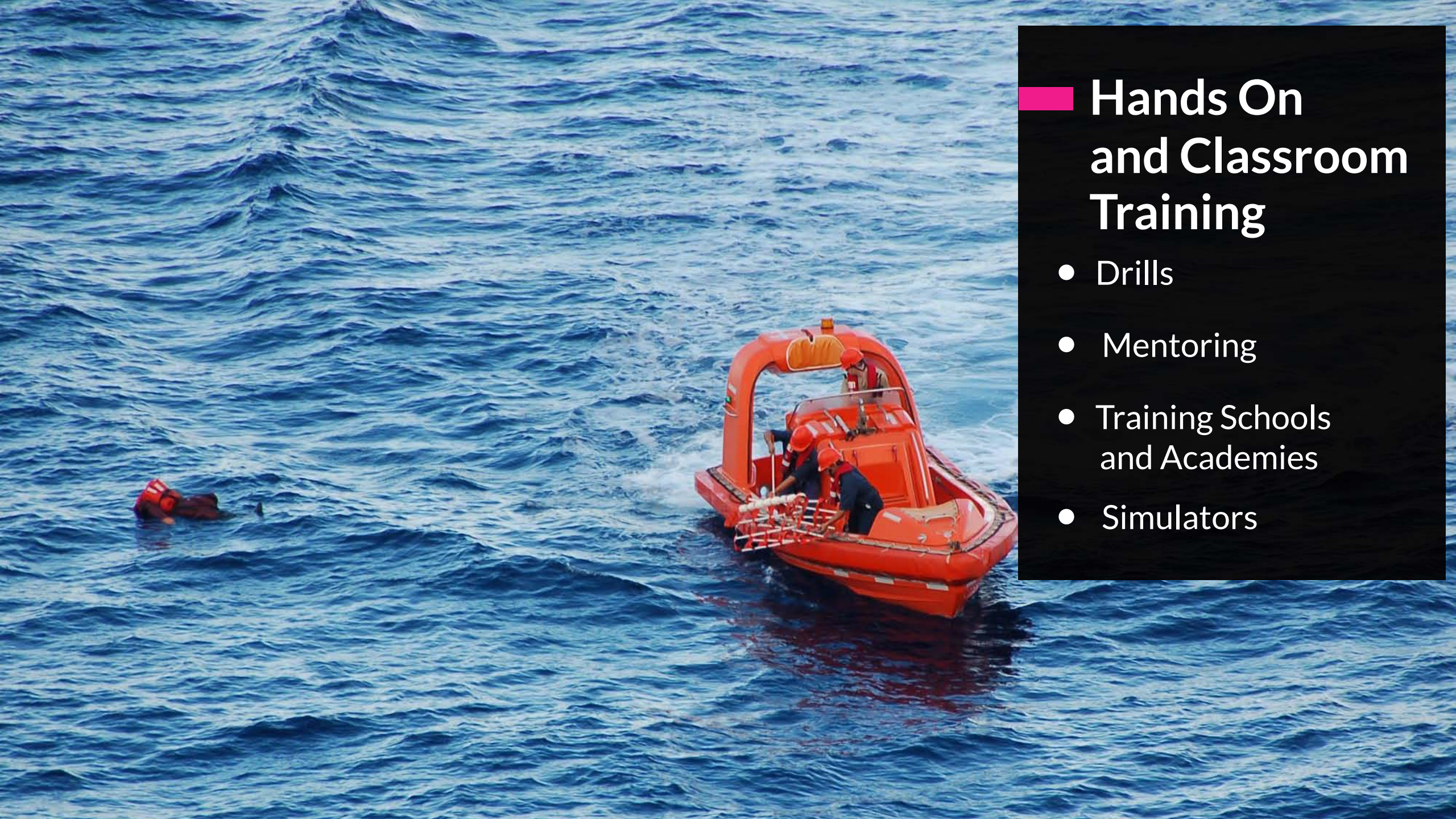
Learning Management System (LMS)

- Web-Based Platform for the Administration, Documentation, Tracking, Reporting, and Delivery of Education & Training
- Assign and Track Required Training Online / eLearning Courses
- Automated Notifications / Reporting
- Record Offline Training / Certificates Drills / Audits / Inspections
- Interface LMS with HR and Vessel Mgmt Systems

Remote Vessel LMS Platform

- Local Courses Installed Vessel Computer or Crewmember's mobile devices
- Deliver & Track Training Offline
- Automatically Syncs Course History Once Reconnected to Internet
- Ideal for Dispersed / Remote Workforce
- Single Sign-On Security & Double Encryption





Hands On and Classroom Training

- Drills
- Mentoring
- Training Schools
and Academies
- Simulators



■ New Sub M Training Programs

- Navigation Safety: Duties of a Lookout (§140.645)
- Navigation Safety: Watchstanding (§140.645)
- Crew Safety Orientation (§140.410)
- Safe Skiff Operations (§140.420)
- Conducting Effective Onboard Drills (§140.420)
- Safe Line Handling for Assist Tugs (§140.515)



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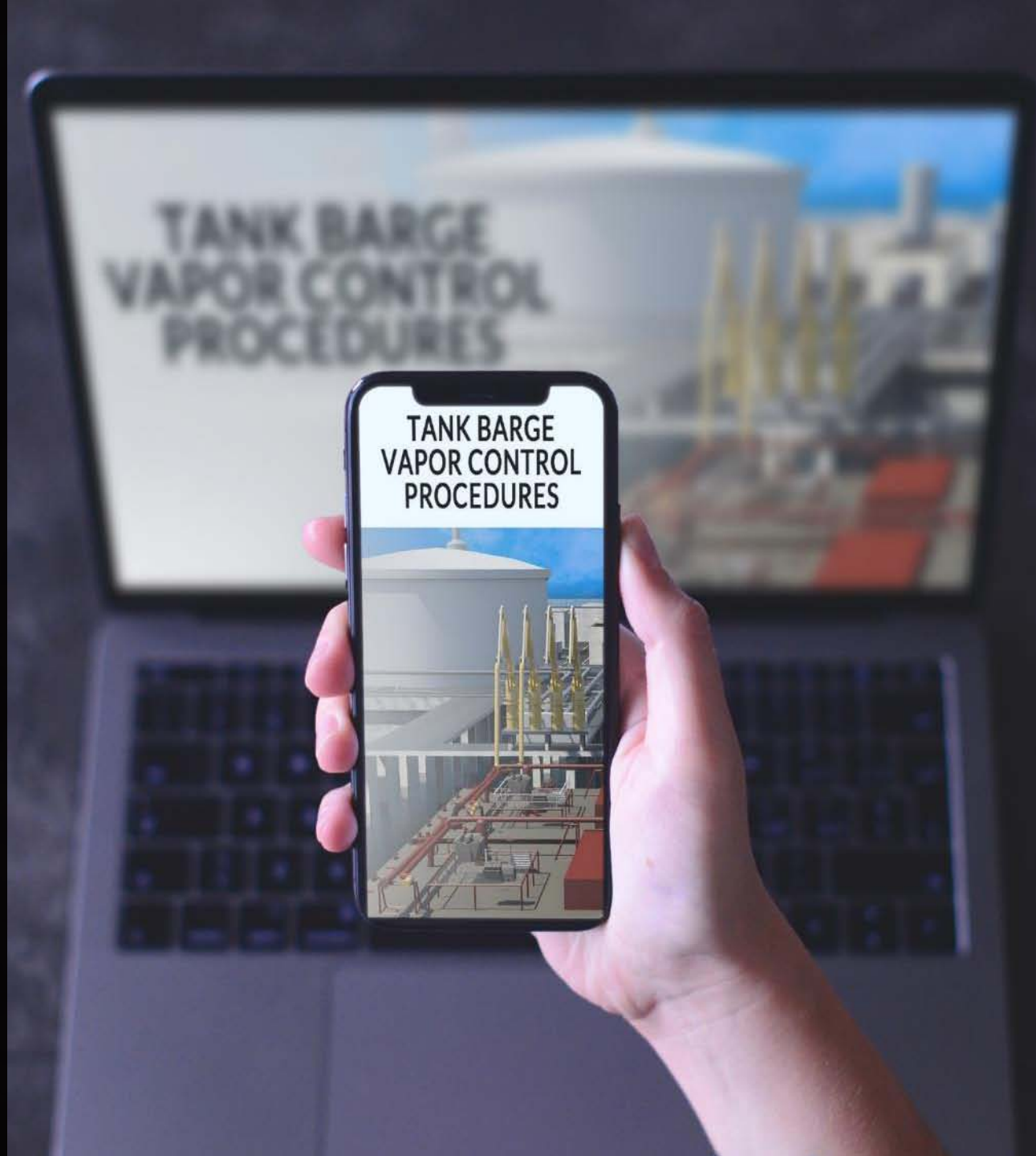


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New Sub M Training Programs

- Tank Barge Vapor Control Procedures (\$39.1011)
- Preparing for a Sub M TSMS Audit
- Preparing for a Sub M TSMS Survey
- Crew and Visitor Onboarding Orientation
- Maritime Confined Space
- Hundreds of additional RCP, USCG, IMO, MTSA, OSHA, HR, DOT, ISNetworld compliance courses

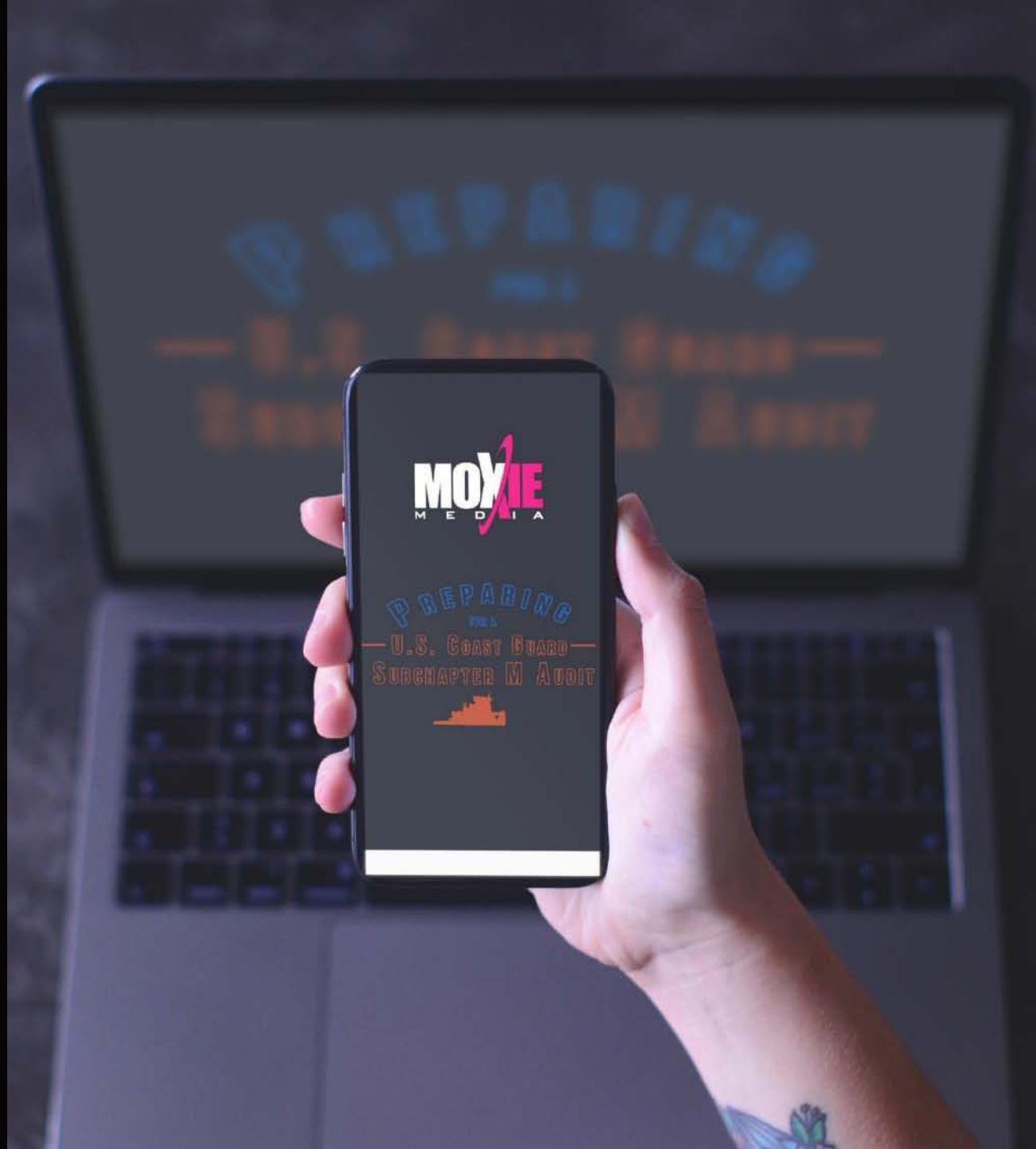


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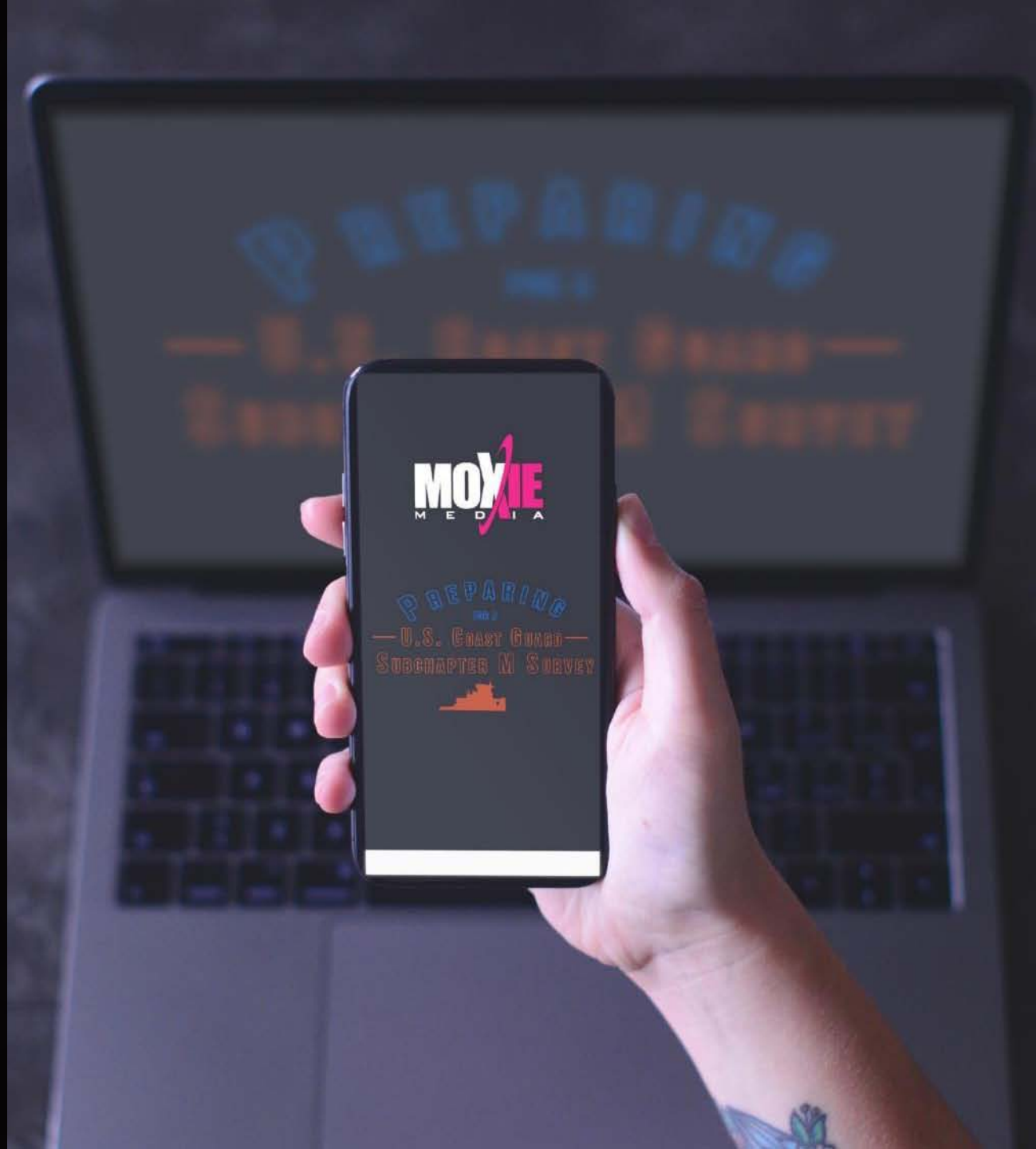


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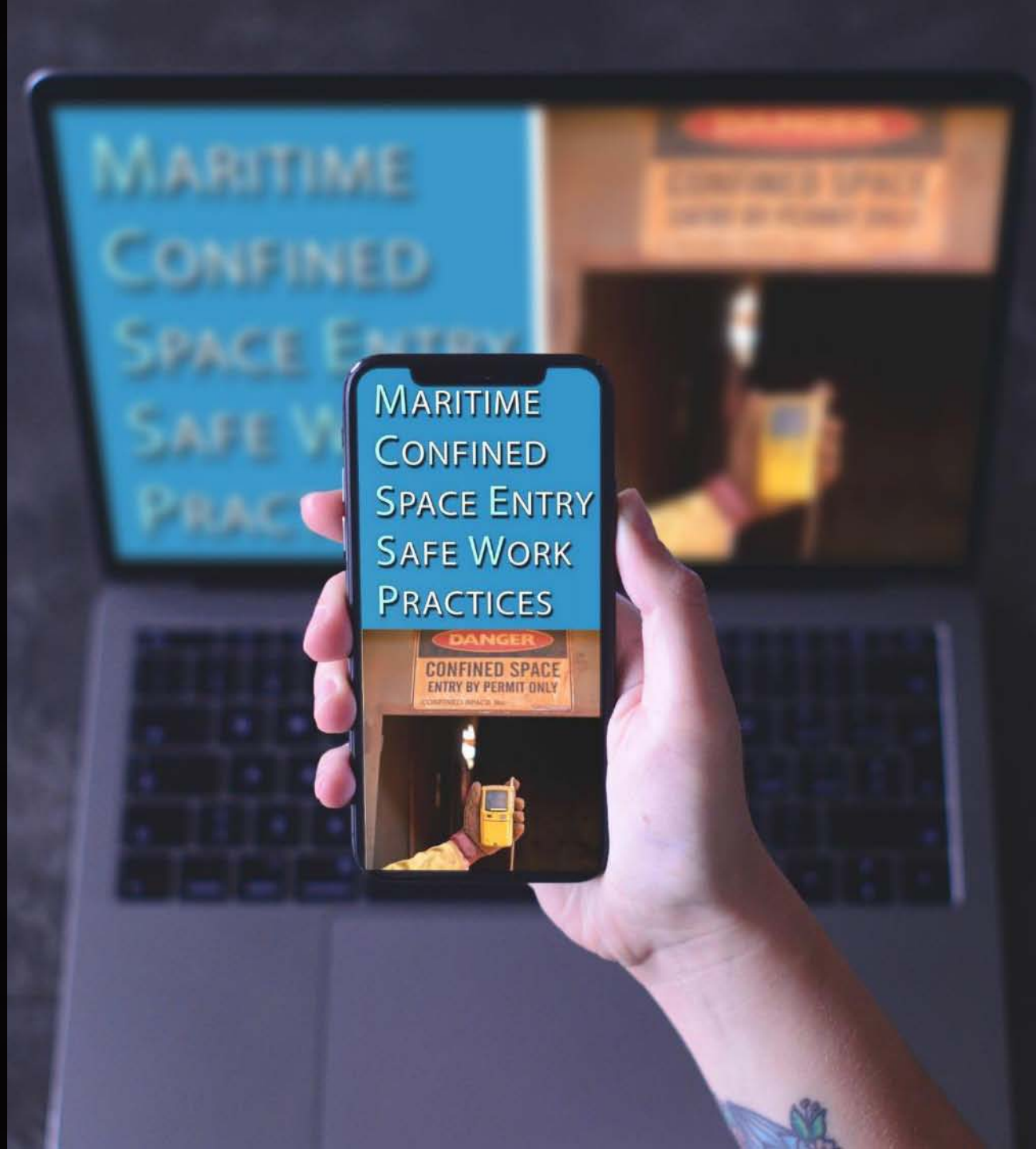


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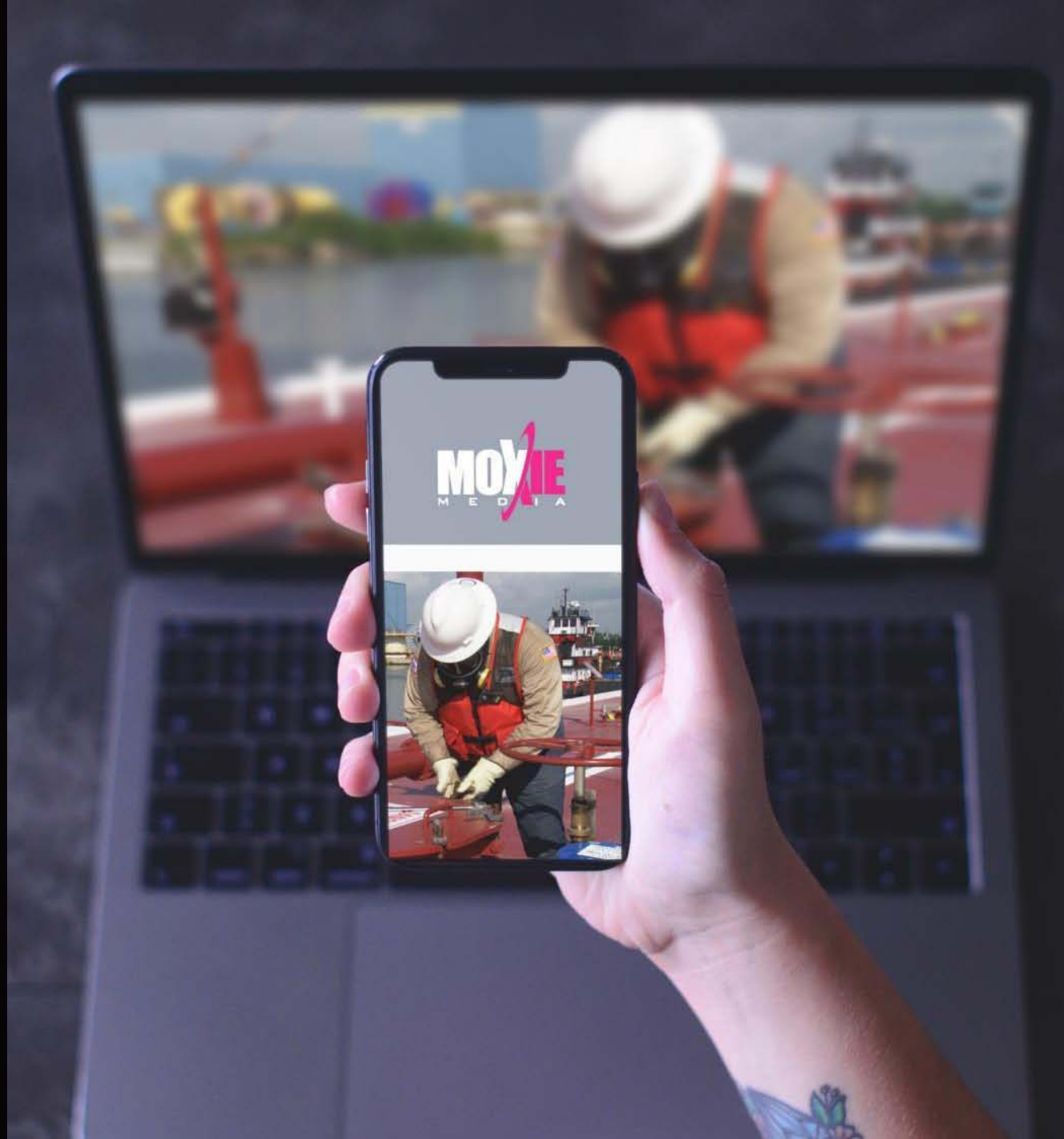
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■ Training Delivery Options

- DVD/USB (with Instructor Resource Kit)
- eLearning – Moxie LMS
- eLearning – 3rd Party LMS
- eLearning PPV
- Streaming Video PPV

Sub M Compliance Signs





 Questions & Answers

Thanks!

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