The New Face of Safety Standards for 2017

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In the definition of Management of Change (MOC), three fairly significant groups of standard changes have debuted for 2017, here’s a snapshot.

The American National Standards Institute (ANSI) has updated their 2010 revision of the Z390.1, “Accepted Practices for Hydrogen Sulfide (H₂S) Training Programs” for 2017. The Z390.1 Revision Committee made up of industry stakeholders and subject matter experts spearheaded the overhaul in part to the ongoing hazards with H₂S that relate to significant risk and exposure. Beyond that, the former standard had a more industry specific focus, a mixture of “mandatory” and “advisory” terminology and interpretable content often flexed to negate intent of this voluntary applied standard practice. The updated performance standard institutes some specific requirements that the employer must meet to be able to verify that the student has competency beyond the former standard where it was largely upon the student to learn and apply. The change really reflects a closer correlation to the OSHA language for “demonstrated competency” of knowledge, training and with equipment (brand, type, size and style) within work conditions that match the application. The standard will include, but not limited to, a mandatory student instructional contact time between 3-4 hrs1 applying to initial and required annual retraining. An expanded requirement for visitors to areas where H₂S may be present and a more poignant lateral reference to ANSI Z88.2 – 2015, “Practices for Respiratory Protection”. Not excluding of course, the expectation that training program creation or re-tooling of current programs meet the updated 2016 version of the ANSI Z490.1 standard for “Accepted Practices in Safety, Health and Environmental Training”.

Once you begin to fold in the ANSI Standard impacts, that are enforceable under the General Duty Clause2, you cannot help but think in a downturn condition, I cannot hire anyone (yet) to assist with this and in the spirit of doing more with less, is there a more turnkey solution?

Enter the Bureau of Land Management (BLM), who updated Onshore Order 3, 4, and 5 in Q4 of 2016. Changes that took years in the making and not without some spirited input from industry and regulatory groups alike. At least one of the changes was related to the acceptance surrounding remote tank gauging which could be impactful for tank gauging exposure potential3.

Finally, the Occupational Safety and Health Administration (OSHA). The agency issued a memorandum for “Enforcement Guidelines for Upstream Oil and Gas Extraction Industries”. This was targeted to employers under NAICS Code 211111 for “Crude and Natural Gas Extraction”, NAICS Code 213111 for “Drilling Oil and Gas Wells” and finally NAICS Code 213112 for “Support Activities for Oil and Gas Operations”, summarized as scopes of work for drilling, servicing and production operations. Within the memo it identifies not only employers of those NAICS codes but the contractor performed work activities of those industries. Within the “Priority Hazard Items” listing4 for CSHO’s to target were A) Respiratory Protection and Hazard Communication for Hydrogen Sulfide (H₂S) and VOC’s exposures including tank gauging operations, B) Chemical overexposures to H₂S for all upstream operations and to poisons (Carbon Monoxide), asphyxiates (Carbon Dioxide), and Volatile Organic Compounds (VOC’s) (heptane, hexane, octane, pentane and propane) during tank gauging operations where exposures to substances listed in Table Z-1 and Z-2 must not be exceeded. C) Hazard Communication (HCS) in upstream operations including H₂S exposures in all operations and chemical exposures during tank gauging operations. Oh, it gets better – 1910.1200(d)(1) Hazard Classification. “Chemical manufacturers and importers shall evaluate chemicals produced in their workplaces”. I would encourage you to check out CPL 02-02-079, where it goes on to outline under “known to be present” that “oil and gas products; the producer are considered manufacturers under the HCS”5.

PEC Safety is part of your solution. With the only industry wide accepted and ANSI Z390.1 compliant program for the academic training portion, making PEC H₂S Clear (www.pecsafety.com/h2sclear) a training requirement can significantly and consistently reduce the liability related to this hazard and costs for re-training and hiring. Open the door to recordkeeping verification and consistency. Check us out today for a demo, www.pecsafety.com.

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1 Verify with printed copy of standard for exact number.
2 See OSHA 1910 General Industry Standards, 5(a)1 references, the OSHA Act and 1926 Construction Standards with any General Duty Clause reference including the process of application per OSHA Field Operations Manual (FOM) current version.
3 See BLM issued onshore order revision content language for more.
4 Not an exclusive list of OSHA Standard priority hazard items, see memo for inclusive list. Memo authored by Thomas Galassi, Director, Directorate of Enforcement Programs to Regional Administrators.