



LESSONS LEARNED

When Is Training Enough?

by Frederick C. Clark, ARM

Vice President, Transportation Services

Kendal was happy to have his new job as a driver for a major chemical company. He had just completed one week of classroom training and a practice delivery with Bill, a senior driver. The safety equipment was signed out. Each book, paper, procedure and instruction was dutifully placed in the cab for easy reference. The trip was going well. Dispatch had been on time, and traffic was cooperating for a change. Even the guard at the gate recognized his truck and company, so the “check-in” went smoothly. He was proud to be driving a clean, well-maintained vehicle.

Kendal knew he was carrying a hazardous material in his tank truck and was well aware of its corrosive properties. The training had been very clear! Special detailed steps were required to properly deliver the product.

After pulling up to the stationary tank and setting the parking brake, Kendal put on his hard hat, safety glasses and gloves to start filling the customer’s tank.

DISASTER STRIKES

The hoses were connected, and the transfer pump was started to off-load the hazardous chemical. All of a sudden there was a big explosion, and the corrosive chemical flooded into the delivery way. The emergency personnel at the plant were not prepared to respond and assumed the transporter was responsible for a release during product delivery. While Kendal was being rushed to the nearest hospital with chemical burns over 60 percent of his body, the corrosive

chemical discharged into a wetland and stream along the facility property line. Kendal’s recovery was long and painful, and the facility’s cleanup was difficult and expensive. Kendal was unable to work again. Lengthy litigation between the transporter and facility ensued over Kendal’s injuries and the facility’s cleanup expenses.

WHO WAS AT FAULT?

The investigation determined that a recirculation and vent valve were not opened at the facility. This caused the hose and the vent line to rupture and empty the contents of the truck and the tank. The investigation also revealed that while the hard hat, safety glasses and gloves were in use, the chemical resistant coveralls and face shield were not used. But, most importantly, the investigation found that Kendal did not understand the proper valves to open to effect the safe transfer of the corrosive chemical. Although Kendal was found to be at fault for the release, the facility also was found to be at fault for not supervising the delivery and having an inadequate emergency response plan. Furthermore, procurement contracts were discovered that completely indemnified the transporter from environmental damages during product deliveries.

THE FOUR ELEMENTS OF EFFECTIVE TRAINING

Where did the facility and transporter training and response go astray? A review of the classroom training material determined that correct valve positions at the facility had been covered, and the senior driver had demonstrated this valve sequence during the practice delivery. However, a trained representative from the facility was not designated to observe the site-specific training

2 | WHEN IS TRAINING ENOUGH?

or provide an evaluation on the adequacy of the training. The plant emergency response team had not been adequately trained for a response to a tank truck release. Furthermore, the parties had never discussed emergency response capabilities and responsibilities.

Effective facility and driver training involves four elements:

- Initial*
- Observation
- Evaluation/Feedback
- Support/Follow-up

**Many companies do an excellent job with initial training. The material is written, and the instructor is very practiced in delivering the training material. Most often the written material is given to the employee. However, the next three steps often are neglected!*

During the Observation step, the trainer learns whether or not the student learned the lesson. Did the student understand and remember the correct delivery instructions? Driver observations at the delivery site and during spill response scenarios are the only ways to get his information. For the observations to be meaningful, the observer must evaluate the driver and responder's actions and give constructive feedback. The evaluation generally entails a checklist developed from the classroom material. Key points are emphasized. This feedback not only corrects any "miss-step," but also strengthens the correct actions. It also reinforces the standard that was set during the classroom instruction. Additional observations are conducted to support the previous review and to give feedback to assure the safety of chemical deliveries and effectiveness of a spill response.

Observation, evaluation, feedback and support all have a follow-up element. An additional follow-up aspect is the overall evaluation of the training so that improvements can be incorporated into the future update of the program.

While the preceding information dealt with observations during product delivery and emergency response, these same principals also apply to product pick-up, driving techniques and plant safety programs. All aspects of an employee's daily job should be "observed" to emphasize the important parts and to assure the training has "taken."

THE GOAL: CONSISTENT, SAFE DRIVER PERFORMANCE

When is training enough? When the training-observation-evaluation-feedback-follow-up cycle has resulted in consistent, safe driver performance.

The "Observation" program also will identify and emphasize the proper use of personal protective equipment.

Frederick Clark has a BS degree in Chemistry and over 30 years of experience in the safety, health and environmental field. He has gained expertise in many aspects of personal and fleet safety and loss control management. He serves the fleet safety needs and distribution-related needs of clients by providing training, assessments, risk analyses, and other loss prevention programs.

The information contained herein is intended for informational purposes only and does not constitute legal advice. For legal advice, seek the services of a competent attorney. Any descriptions of insurance provisions are general overviews only.

"XL Insurance" is the global brand used by XL Group plc's (NYSE: XL) insurance companies. Coverages underwritten by Greenwich Insurance Company, Indian Harbor Insurance Company, XL Insurance America, Inc., XL Specialty Insurance Company and XL Insurance Company Limited—Canadian Branch. Coverages not available in all jurisdictions.



XL Environmental • Risk Control Division
505 Eagleview Boulevard, PO Box 636
Suite 100
Exton, PA 19341-0636
Phone: 800-327-1414
Fax: 610-458-7285
www.xlenvironmental.com