

Introduction

In February 2016, the Technical Standards & Safety Authority (TSSA) sent a memo to ROT Training Providers to advise they had been developing new curriculum standards for the Records of Training (ROT) under Ontario Regulation 215/01, in order to establish minimum standards for program delivery across the province of Ontario and to enhance fuel safety training.

TSSA has developed curriculum standards for the following Record of Training Categories:

Propane Plant Operator 1 (PPO-1), which authorizes ROT holders to transfer propane to and from tank cars, cargo liners, tank trucks, filling plants and container refill centres. In addition, ROT holders may fill containers and operate propane transfer equipment in a filling plant or container refill centre.

Propane Plant Operator 2 (PPO-2), which authorizes ROT holders to transfer propane to and from tank trucks, filling plants and container refill centres. In addition, ROT holders may fill containers and operate propane transfer equipment in a filling plant or container refill centre.

Propane Plant Operator 3 (PPO-3), which authorizes ROT holders to fill containers, including vehicle tanks, and operate propane transfer equipment in a filling plant or container refill centre.

Propane Truck Operator (PTO), which authorizes ROT holders to operate a propane tank truck or a vehicle that tows a cargo liner. ROT holders may operate propane handling equipment in order to transfer propane to and from tank trucks, cargo liners, filling plants and container refill centres. In addition, ROT holders may fill containers on the premises of end-users and reactivate an existing customer's equipment in accordance with the manufacturer's lighting instructions in the event of loss of fuel supply.

Construction Heater Operator up to 400,000 BTUH (CH-02), which authorizes ROT holders to activate a propane, natural gas or oil-fired construction heater or torch with an input of 400,000 BTUH or less. In addition, ROT holders may connect it to or disconnect it from piping, tubing, a refueling appliance, a container or a natural gas meter.

Roofing Equipment Operator (REO), which authorizes ROT holders to activate and operate a propane-fired tar pot heater with an input of any BTUH and connect it to or disconnect it from piping, tubing or a container.

In the memorandum, TSSA advised training providers that their training courses must comply with the new curriculum standards as of May 1, 2016, regardless of previous accreditation or program approval. Discussions with TSSA personnel confirmed that Training Providers may require more time to bring programs into compliance, however, current programs requiring updating must not be delivered after May 1, 2016. This offers Training Providers the opportunity to prioritize curriculum updates since seasonal demand often dictates when certain programs are offered. For example, the primary training season for CH-02 is typically late summer through early winter, so Training Providers will need to ensure training for the next heating season meets the new curriculum requirements.

The Fuels Learning Centre applauds the efforts of TSSA to identify the content required to address specific learning outcomes within recognized ROT categories. This assists Training Providers in ensuring consistency and gives employers a level of comfort that their employees will receive similar training regardless of which Training Provider they choose. In reviewing the new curriculum standards, we have determined that most training programs offered by the Fuels Learning Centre already address most of the new requirements and will require only minor tweaks. However, our review has also uncovered some concerns which we feel can be quite easily addressed.

Concerns

Our review of the curriculum standards for the above six ROT categories has identified the following concerns:

Scope Creep

We have identified some instances where the recommended content exceeds the intended job functions of specific employees. For example, there are a number of topics related to plant maintenance in PTO training that bulk truck drivers simply would not be involved in on a day-to-day basis. In PPO-3 training, the curriculum standards call for people filling cylinders to understand the working pressures of propane appliances and the calorific value of propane.

Industry skills training typically focuses on providing “need to know” information and skills development to ensure students learn everything they need to do their jobs safely. When the curriculum expands to areas of information that may be auxiliary or “good to know”, the topics add bulk to the training and increases the time it takes to ensure the student is trained and qualified. In addition, adding too much “good to know” information may make it difficult for the student to understand which are the most important things to know.

We agree that students should understand that the training they are taking has been developed to address requirements specified in national Codes, Standards, and Regulations which have been adopted into provincial Acts and Regulations. In fact, Fuels Learning Centre training programs specifically indicate which Codes Standards and Regulations are addressed in each training course. We are concerned however, that some of the curriculum standards related to legislation focuses more on what the regulation stipulates, rather than the skills required by the student in order to be compliant with the regulation. In this area as well, an increased focus on regulatory requirements adds bulk to the training program, increasing delivery times.

ROT Categorization

We applaud TSSA’s approach to creating sub-categories within existing ROT categories which allows for more focused training related to limited job scope. This also helps eliminate the concerns of Instructors who are unable to conduct practical skills evaluation if the student’s workplace does not complete a specific function, such as container purging. However, we feel that additional sub-categories may be required to further address job and equipment specific requirements.

In addition, there are a number of activities which require training, but do not fall within the scope of existing ROT categories. Since training programs must fall within defined ROT categories in order to be recognized by TSSA, we are concerned that some training is just not happening when there is no defined requirement. We have a number of recommendations related to ROT categorization which, if implemented, would support increased safety within the propane industry.

We also believe there are some current ROT categories that do not reflect the realities of division of labour in the workplace. For example, it is not likely there would be many employees who actually conduct all of the activities outlined in the PPO-1 category.

Curriculum Standards Development Process

The memorandum indicated that the new curriculum standards have been under development for the past year and have been reviewed by industry partners and training providers prior to their publication. In some of the ROT categories addressed in this first round of curriculum development, the Fuels Learning Centre is one of only two recognized Training Providers, yet we were not invited to participate in these discussions. We are also concerned that the development of these standards has not been an ongoing agenda item for either the propane RRG or the Training and Certification Advisory Board (TCAB). In fact, some of the new requirements related to training on the filling of auto propane tanks is in direct conflict to discussions that have been ongoing at the propane RRG. In those discussions, industry has expressed the need to dramatically reduce the amount of time required to train an individual on how to fill their own auto-propane vehicle from a private fleet dispensing unit yet the new curriculum standards require up to four hours of training.

Recommendations

The Fuels Learning Centre respectfully submits the following recommendations for TSSA's consideration:

1. The propane Risk Reduction Group (RRG) should have an on-going agenda item related to ROT standards development in order to provide guidance and direction. This would also help the RRG ensure that when decisions are made regarding operational activities, that the impacts related to training and updating current ROT holders, where required, are fully considered.
2. The Training and Certification Advisory Board (TCAB), should be reactivated in order to address training issues identified by the propane RRG and to establish ROT-specific sub-categories as required.
3. The RRG should, either directly, or through TCAB, recommend the key learning objectives to be included within specific ROT categories providing sub-committees and Training Providers the flexibility to determine what details may be required to achieve the objective without being so prescriptive that any variances might make a specific training program ineligible for recognition.
4. Moving forward, all TSSA accredited Training Providers for a particular ROT category under review should be invited to participate in curriculum standards development.
5. When developing the curriculum standards, consideration should be made on the total delivery time of the training including written exams and practical examinations to ensure the training can be delivered in time frames acceptable to employers. For example, total delivery should not exceed 4 hours for programs under CH-02 or 8 hours for PTO.
6. Consideration should be made to allow for certain topics to be covered optionally. For example, not every container refill centre purges containers, therefore, to make the topic mandatory can create issues related

to delivery. Training Providers should be given clear direction on how optional topics are reflected on the resulted ROT wallet card.

7. Make changes in regulation 215/01 which gives the Director an easier path to creating new ROT categories and redefine existing ROT categories to reflect ongoing changes within the industry.
8. Topics included in PTO training should be limited to day-to-day responsibilities of a typical bulk truck driver.
9. Sub-categories of the PTO category should be implemented to reflect the skills required by various different types of vehicles. For example: PTO-TT (tank truck drivers) and PTO-CL (cargo liner drivers).
10. Expand the PTO category to include cylinder truck operators (PTO-CY) and crane truck operators (PTO-CR).
11. PPO-1 should be re-aligned to focus on training programs related to maintenance and inspection of propane bulk plants. For example, there are a number of new maintenance requirements in the CSA B149.2 that are not reflected in any current ROT categories.
12. PPO-2 should be re-aligned to focus on training programs related to specific job functions such as the visual inspection of tanks and pressure relieve valves in ASME storage tanks, evacuation of propane from consumer storage tanks, and other functions conducted by propane distributors but not covered by existing ROT categories.
13. Add a sub-category of training to address the specific requirements related to the unloading of propane rail cars at a bulk plant (PPO-4, or a new sub-category of PPO-2).
14. Add an additional ROT sub-category to address cylinder filling by volume only, for operations such as warehouses who fill propane forklift cylinders (PPO-3F).
15. Redefine CH-01 and CH-02 categories so that one course can be used to deliver training on construction heaters and torches of all BTUH inputs and require the Training Provider to indicate whether the skills evaluation was conducted on appliances of all BTUH inputs or limited to appliance up to 400,000 BTUH.