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AD50 Technical Changes to Production Measurement and Training Requirements

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Technical Changes to Production Measurement and Training Requirements

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General Comment

In 250.1500, the proposed definition (clarification/change) for "Production Safety" now states that it "includes safety in production operations". In my opinion, rather than clarify the definition, this would only cause more uncertainty as to what is (or should be) included in Subpart O regulation. The original definition for Production Safety was fine and needed no further clarification.

With the addition of the statement "includes safety in production operations", a case could then be made that safety related training such as hazard communication, hearing conservation, water survival, etc., would become part of

the Subpart O Training requirements. Is this the intent of the change in the definition ?