Operator Qualification
“OQ”
Crash Course
Contact Information

Leticia Santos-Hernández
Pipeline Safety Specialist/Instructor
PHMSA/Training & Qualifications

Leticia.santos@dot.gov
405-686-2310
In Part 192

Certain Functions are Covered

• Operations
• Maintenance
• Emergency Response
• New Construction (>80% SMYS)
What is a covered task?

- Is it performed on a pipeline facility?
- Is it an operation or maintenance task?
- Is it performed as a requirement of Part 192?
- Does it affect the operation or integrity of the pipeline?
THE 4 PART TEST

The answer must be **yes** to **all** 4 questions to be considered a covered function under the regulation.
§192.801 Scope

• Rule prescribes minimum requirements
• Not necessarily part of O&M Plan
• May expand minimum requirements (without penalty)
  • (Example: including tasks not identified to be covered tasks)
§192.801 Persons Covered

- Individuals performing covered tasks
- Operator personnel
- Contractor/subcontractor personnel
- Any other entity doing task
§192.803 Definitions

Abnormal Operating Conditions

“...a condition identified by the operator that may indicate a malfunction of a component or deviation from normal operations that may indicate a condition exceeding design limits or result in a hazard(s) to persons, property, or the environment”
Abnormal Operating Conditions

§192.803

- May be encountered while performing the covered task
- Must exceed design limits or present hazards to persons, property or environment
§192.803

Abnormal Operating Conditions

- Recognize
  - related to covered task being performed
- React
  - this may include notifying the responsible parties or taking corrective action to mitigate the condition.
Evaluation

• By any of the following:
  • Written examination
  • Oral examination
  • Work performance

§192.803
Evaluation

- Observation
  - performance on the job
  - on-the-job training
  - simulations

§192.803
Evaluation

- Not an event (ongoing)
- Documentable
- Must use any appropriate evaluation method

§192.803
Qualification Modes

- “Transitional” (Between effective date & compliance date)
- “Initial” (Any qualification for people who have not performed task prior to effective date)
- “Subsequent” (After transitional and/or initial)

§192.803
Definitions

Qualified

“...an individual has been evaluated and (a) can perform assigned covered task and (b) recognize and react to abnormal operating conditions”

§192.803
Qualification Program

Provisions to:

- Identify covered tasks
- Evaluate individuals who perform covered tasks
- Allow non-qualified individuals to perform covered tasks

§192.805
Qualification Program

Provisions to evaluate: if employee's performance contributed to an accident

§192.805
Qualification Program

Provisions to evaluate:
if the employee is no longer qualified due to their actions or task changes

§192.805
Qualification Program

Provisions to communicate changes affecting covered tasks

- to whom the changes need to be communicated
- how the changes will be communicated
Qualification Program

Provisions to identify:

• the need for subsequent evaluation of qualification
  – which tasks may need additional evaluation
  – appropriate interval for additional evaluation

§192.805
Qualification Program §192.805

• Provide Training as appropriate to ensure individuals performing covered tasks have
  • Skills
  • Knowledge
  • Ability

• Notify the Administrator of any Significant changes once inspected and accepted
Record Keeping

- Records shall include:
  - Identification of qualified employees
  - Covered task they are qualified to do
  - Date of current qualification
  - Qualification methods
Record Keeping

- Records supporting current qualification - while person is performing the task.

- Records of prior qualification and records of individuals no longer performing covered task shall be retained for a period of five years.
Record Keeping

• All individual qualification record-keeping requirements must be available on the compliance date of the rule
• All records commenced Oct 28, 2002
General

- Written Qualification Program
- Complete and in place April 27, 2001
General

• All Qualified by 10/28/2002
• WPHR not after 10/28/2002
• OJT NOT sole method of Evaluation after 12/16/2004
What will the inspector be looking for?

OPERATOR QUALIFICATION RULE
Section 192.801 Scope

If the Operator has a process in place to determine the qualification of individuals who perform covered tasks
Section 192.801 Scope

Does the process to identify covered tasks include the 4-part test?

1. Is performed on a pipeline facility;
2. Is an operations or maintenance task;
3. Is performed as a requirement of this part; and
4. Affects the operation or integrity of the pipeline.
<table>
<thead>
<tr>
<th>TASKS</th>
<th>Is performed on a pipeline facility</th>
<th>Is an operations or maintenance task</th>
<th>Is performed as a requirement of this part; and</th>
<th>Affects the operation or integrity of the pipeline</th>
</tr>
</thead>
<tbody>
<tr>
<td>Visual Inspection for Internal Corrosion</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Manually Opening and Closing Valves</td>
<td>✓</td>
<td>✓</td>
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<tr>
<td>Adjust and Monitor Flow or Pressure - Manual Valve Operation</td>
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<td>✓</td>
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<tr>
<td>Compressor Preventive Maintenance</td>
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<tr>
<td>Inspection of Breakout Tanks</td>
<td>✓</td>
<td>✓</td>
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</tr>
<tr>
<td>Joining of Plastic Pipe - Stab Fittings</td>
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<td>✓</td>
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<tr>
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<tr>
<td>Bagging and Stopping Low Pressure Pipe</td>
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<td>✓</td>
<td>✓</td>
</tr>
</tbody>
</table>
Section 192.805 Qualification of Pipeline Personnel

If the Operator is following their written Qualification Program
Section 192.805 Qualification of Pipeline Personnel

Provisions to ensure through evaluation that individuals performing covered task are qualified?
Section 192.805 Qualification of Pipeline Personnel

Provisions to allow individuals that are not qualified to performed a covered task?
Section 192.805 Qualification of Pipeline Personnel

If the Operator has identified “Abnormal Operating Conditions?
Section 192.807 Recordkeeping

If the Operator has records that demonstrate compliance with this Section?
Questions?