



U.S. Department of Transportation  
Pipeline and Hazardous Materials  
Safety Administration



## **PHMSA - Office of Pipeline Safety Warren Miller**



# SD/ND/WY Pipeline Safety Operators Training

OQ: Contractor Procedures &  
AOC's

April 4, 2013



# The Regulation

- **§192.805/195.505 Qualification program.**
- Each **operator** shall have and follow a written qualification program. The program shall include provisions to:
  - (a) Identify covered tasks;
  - (b) Ensure through evaluation that **individuals** performing covered tasks are qualified;
  - (c) Allow **individuals** that are not qualified pursuant to this subpart to perform a covered task if directed and observed by an individual that is qualified;
  - (d) Evaluate an **individual** if the **operator** has reason to believe that the **individual's** performance of a covered task contributed to an incident as defined in Part 191;



# The Regulation

- (e) Evaluate an **individual** if the **operator** has reason to believe that the individual is no longer qualified to perform a covered task;
- (f) Communicate changes that affect covered tasks to **individuals** performing those covered tasks; and
- (g) Identify those covered tasks and the intervals at which evaluation of the **individual's** qualifications is needed.



## The Regulation

- (h) After December 16, 2004, provide training, as appropriate, to ensure that **individuals** performing covered tasks have the necessary knowledge and skills to perform the tasks in a manner that ensures the safe operation of pipeline facilities; and
- (i) After December 16, 2004, notify the Administrator or a state agency participating under 49 U.S.C. Chapter 601 if the operator significantly modifies the program after the Administrator or state agency has verified that it complies with this section.



# REALITY

- Some operators rely on contractors for the procedures that operator or contract personnel follow to perform a covered task
  - The operator must have a reference to that procedure in their OQ written plan (as being accepted and used)
- Some operators rely on the qualifications from an individual contractor or a consortium for contractor personnel performing covered tasks
  - The operator must have a reference to that acceptance in their written plan
  - The operator must be able to provide adequate records of evaluation/qualification when inspected



# REALITY

- Some operators have required contractors to have an OQ plan. This is not required by the regulations.
- \* If an operator is accepting an OQ plan from a contractor, the operator's plan must reference the acceptance of the plan and be able to document that a review of the contractor's plan has been performed by the operator.





# Regulation

## §192.803 Definitions.

Qualified means that an individual has been evaluated and can:

- (a) Perform assigned covered tasks; and
- (b) **Recognize** and **react** to abnormal operating conditions.

Abnormal operating condition means a **condition identified by the operator** that may indicate a malfunction of a component or deviation from normal operations that may:

- (a) Indicate a condition exceeding design limits; or
- (b) Result in a hazard(s) to persons, property, or the environment.





## AOCs

- Have you identified the AOCs associated with your system and covered tasks?
  - Many operators have developed generic and task-specific AOCs
  - Systems with CO<sub>2</sub> and NH<sub>3</sub> may have specific issues that crude or natural gas systems would not need to consider
  - Environment, specific pipe qualities, etc
- \* The code was developed as performance based so that each operator could address their systems.



## R & R OF AOCs

- Recognizing AOCs – how have personnel been trained/conditioned to recognize an AOC while performing covered tasks?
  - Reacting to those AOCs – does the operator personnel know how to react to AOCs?
  - Do the contractor personnel working for that operator know how to react to the same AOCs? Is it the same as the operator personnel or do they do something different?
- \* - **What documentation do you have?**



## WHERE NOW

- AOC's have been number one on the potential issue list since OQ started
- It is important to remember that some generic AOC training may not address operator specific conditions
- Some operators have determined that anyone on the facility gets basic AOC training
- Some operators have determined that there is a knowledge/gap on AOCs; 80/20 or 90/10



# Inspections

- During field inspections regarding OQ, inspectors are trained to observe the completion of the covered task correctly and determine by interview if the qualified individual knows how to recognize and react to AOCs.
- When possible I will observe both operator and contract personnel to determine their understanding of the CT and the AOCs



# ISSUES

- Management of Change is a crucial part of any program, but with OQ it is important to ensure the loop has been closed.
- Example - A change to a procedure may necessitate a change in training, evaluation and qualification program, and also require communication to any number of groups, including **contractors**.



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# ANY QUESTIONS?

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