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

2010

Pipeline Safety Seminar

Operator Qualification

- Did you have your program in place by April 27, 2001? Is there evidence to support that?
- Were all personnel performing covered tasks qualified by October 28, 2002? Is there evidence to support that?

- Have you re-qualified personnel in accordance with your written plan since Oct. 28, 2002?
- If so, was the re-qualification based on, On-the-Job (OJT) Training alone?
- Advisory Bulletin ADB-04-05

- KSA's
- Does your program included assessments based on Knowledge, Skill and Ability?

- Are Abnormal Operating Conditions considered for each specific task or just generic to the program?
- What we have been seeing……..

- ✓OQ non-compliance issues…
  - **Inadequate AOC development**
  - **Training**

- ✓OQ non-compliance issues…
  - **OQ Testing**
  - **OQ plan underdeveloped (e.g., parroting regulation)**

- ✓ Other OQ non-compliance issues…
  - **Lack of due diligence, the result, operators without an OQ plan.**

- ✓ Other OQ non-compliance issues…
  - **Lapses in subsequent qualification of personnel**

- ✓ Other OQ non-compliance issues…
  - **Lack of contractor personnel OQ tracking and assurance**

- ✓ Other OQ non-compliance issues…

  - **Limited/non-existent management-of-change documentation between O&M updates and OQ program**

- ✓ Other OQ non-compliance issues…
  - Lack of personnel qualification documentation
    - 192.807/195.507 Each operator shall **maintain records that demonstrate compliance** with this subpart.
    - **(b)** Records supporting an individual's current qualification shall be maintained ***while the individual is performing the covered task.***

- ✓ Other OQ non-compliance issues…
  - **Incidents with OQ qualified observers missing in action**

- ✓ Other OQ non-compliance issues…
  - **OQ personnel not following O&M and emergency response plans in the field, even though they were trained and tested to do so**

New Construction

- 80% SMYS Pipe under 49 CFR 192 must be constructed using personnel qualified under the OQ Regulation
- 49 CFR 192.620 (c)(6)

New Construction

- Qualified personnel should be conducting the installation of piping
- Non-qualified personnel performing tasks that would be “covered” if performed as maintenance activities

New Construction

- Contractor work must be supervised carefully

New Construction

- Several construction-related incidents caused damage to underground pipelines in CA, TX, VA & WY, resulting in deaths, injuries, property damage and disruption of service

New Construction

- PHMSA AB 06-01 published in FR on 1/17/06 (71 FR 2613) damage prevention

- ***Qualified*** (One Call Notification, line locating and marking, and inspection of construction activities)

New Construction

- *PHMSA AB 02-01 published in FR on 5/24/02 (67 FR 36667) urged operators to follow the best practices on damage prevention found in the Common Ground (CGA) Study*

New Construction

- Investigations continue to show
- Construction-related incidents violate Federal pipeline safety regulations… and
- The operators construction and maintenance practices ! ! !

New Construction

- **ADB 06-03, Nov 17, 2006 recommends using Common Ground Alliance**
- **The operators own procedures when excavating around operating utilities and facilities.**
- **This is the third in a series of Advisory Bulletins addressing the same issue.**

New Construction

- Good procedures can prevent accidents only if they are followed. Among problems discovered are the following:

New Construction

- ✓ Operators do not always follow their procedures for constructing, repairing, ditching and backfilling in areas where there are existing pipelines (typically procedures prohibit machine excavation within 12 to 24 inches of existing pipelines)

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- ✓ Inspectors at construction sites sometimes fail to assist the operator's employees, operator's contractors, and 3rd party construction contractors in verifying the marked locations of the existing pipeline facilities

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- ✓ Current "as-built" drawings are not always made available to locators and excavators at construction sites before activities began
- ✓ Operators do not always mark pipelines at crossovers

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- ✓ In locations with parallel pipelines, sometimes the wrong pipeline gets marked

New Construction

- ✓ Operators do not always correctly mark all pipelines in the vicinity of the construction and maintenance activities
- ✓ Operators sometimes fail to assign personnel skilled enough to observe excavation and backfilling tasks