

Operator Qualification (OQ) Requirements Regarding LPG Jurisdictional Systems

2021 Jurisdictional LP
Pipeline Safety Seminar
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Discussion Topics

- Operator Qualification Program
- Operator Qualification Question Set
- Operator Qualification Issues



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Operator Qualification Program

- 49 CFR192.801 Scope of OQ Program
 - Personnel must be qualified for covered task when performed on a Pipeline facility.
 - Is an Operations or Maintenance task.
 - Is performed as a requirement of this part.
 - Affects the operation or integrity of the pipeline.



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Operator Qualification Program

(Continued)

- 49 CFR192.805 Qualification Program
 - Each Operator shall have and follow a written program including:
 - Identify covered tasks.
 - Evaluations to verify individuals performing covered task are qualified.
 - Allow individuals not qualified to perform certain tasks while under direct supervision.
 - Except Welding, Plastic Fusing, Tapping



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Operator Qualification Program

(Continued)

- ❑ Evaluate an individual if you believe the individual's performance of a covered task contributed to an incident.
- ❑ Evaluate an individual if you believe they are no longer qualified to perform covered tasks.
- ❑ Communicate changes, that effect covered, tasks to individual's performing those tasks.
- ❑ Establish re-evaluation intervals for tasks.
- ❑ Describe how appropriate training will be performed using knowledge and skills.



Operator Qualification Program

■ 49 CFR192.807 Recordkeeping

- Operators must maintain records to show compliance and at a minimum shall include:
- Identification of qualified individual(s).
- Identification of covered tasks each individual is qualified to perform.
- Date(s) of current qualification and methods used for qualification.
- Record retention of 5 years or as required.



Operator Qualification Inspection Question Set

■ Procedure Questions

- Does the plan identify covered task?
- Does the plan establish evaluation methods?
- Does the plan allow Nonqualified individuals?
- Does procedures ensure that utilized contractors OQ plan is accepted by operator?
- Does the plan establish reevaluation intervals for covered task?



Operator Qualification Inspection Question Set

■ Record Questions

- AOC's records for individual's recognition?
- Records maintained that affect covered task or significant OQ plan changes?
- If and incident or accident occurred are records available showing reevaluation?
- Are records available showing initial qualification, retraining, reevaluation of task?



Operator Qualification Issues

- Inadvertent lapses of qualifications
- Failure to follow the procedures for a task for which an individual has the OQ documentation
 - Do personnel have the necessary qualification records, but lack adequate training?
 - Oversights or intentional shortcuts?



Operator Qualification Issues

(Continued)

- New Technology
 - Do proper OQ Tasks exist?
 - What supplemental/specialty training is required?



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Questions / Comments

<https://www.ecfr.gov/current/title-49/subtitle-B/chapter-I/subchapter-D/part-192?toc=1>

<https://www.phmsa.dot.gov/training/pipeline/small-lp-gas-operator-oq-guide-august-2016>

<https://www.phmsa.dot.gov/training/pipeline/small-lp-gas-operator-guide-april-2017>

