



MOTIVA

DOT Operator Qualification Awareness Training





Motiva Operator Qualification Awareness Training

LEARNING OBJECTIVES

By the end of this session, you will be able to:

- Define the Operator Qualification rule
- Define the Qualification Process
- Define evaluation and describe evaluation methods
- Roles and Responsibilities
- Span of Control
- Emergency Response
- Documentation and Recordkeeping

The Operator Qualification Rule



Department of Transportation's (DOT's) Operator Qualification (OQ) Rule (49 CFR 192 & 195)

“...requires Operators of DOT regulated pipelines to develop a qualification program to **evaluate** an individual’s knowledge skills and ability to perform **covered tasks** and to recognize and react to abnormal operating conditions (AOCs) that may occur while performing **covered tasks.**”

Operator Qualification (OQ) Rule

INTENT OF THE RULE

Intent of the OQ rule:

- To ensure a qualified workforce on regulated pipelines, **AND THEREBY**
- Reduce pipeline incidents and/or accidents caused by human error.

OQ is not intended to be a one-time event, but a process that continues for the working lifetime of an individual.

After initial evaluation and qualification have been completed, re-evaluation and requalification will be required if the individual still performs the covered task.

Per 49 CFR Part 195.2:

Operator means a person who owns or operates pipeline facilities.

Remember, Motiva Enterprises is the Pipeline Operator.

Operator Qualification (OQ) Rule

COVERED TASK LIST

In accordance to the rule, Motiva Enterprises is also responsible for identifying the covered tasks (CTs) for which personnel must be qualified. A covered task is an activity or task, identified by Motiva Enterprises, that:

- Is performed on a pipeline facility
- Is an operations or maintenance task
- Is performed as a requirement of 49 CFR part 192 and or 195
- Affects the operation or integrity of the pipeline.

Each covered task must also include:

- Evaluation Criteria (including AOCs)
- Method of Evaluation
- Span of Control Limits
- Interval for Re-Evaluation of Qualified Individuals.

APPENDIX A - ACCEPTED QUALIFICATION METHODS For all Qualification Methods, the acceptable Abnormal Operating Condition (AOC) module must be taken. <u><i>EWN Abnormal Operating Conditions (AOCs)</i></u> EWN-CBT-Abnormal Operating Conditions: Liquids EWN-CBT-13052 <u><i>NCCER Abnormal Operation Conditions AOCs</i></u> Liquid Pipeline Abnormal Operating Condition (Field) - AOCFG-17 <u><i>EWN Abnormal Operating Conditions Control Center - CRM AOC's (Liquid)</i></u> EWN-CBT-Abnormal Operating Conditions: Control Center - EWN-CBT-85952						
TASK NUMBER	TASK NAME	<u><i>EWN</i></u> <i>Energy WorldNet Recognized Qualifications Methods</i>	<u><i>NCCER</i></u> <i>National Center for Construction Education & Research Qualification Methods</i>	<u><i>OTHER</i></u> <i>Recognized Qualification Methods</i>	RE-QUALIFICATION INTERVALS	SPAN OF CONTROL
1.1	Measure of Structure-to-Soil Potentials	EWN-CBT-86340 & EWN-PE-86341	CT1_1-17 Written & Performance	NA	5 Years	1:1
1.2	Conduct Close Interval Survey	EWN-CBT-86338 & EWN-PE-86339	CT1_2-17 Written & Performance	NA	3 Years	1:1
1.3	Test to Detect Interference	EWN-CBT-86254 & EWN-PE-86255	CT1_3-17 Written & Performance	NA	3 Years	1:1
1.4	Inspect and Perform Electrical Test of Bonds	EWN-CBT-86278 & EWN-PE-86279	CT1_4-17 Written & Performance	NA	5 Years	1:1
1.5	Inspect and Test Electrical Isolation	EWN-CBT-86321 & EWN-PE_86322	CT1_5-17 Written & Performance	NA	5 Years	1:1

Operator Qualification (OQ) Rule

Motiva currently recognizes qualifications for employees through Energy Worldnet (EWN).

Motiva also recognizes qualifications of contractors through EWN and/or NCCER qualification process.

Various vendor and industry organizations, such as American Petroleum Institute (API), American Society of Mechanical Engineers (ASME), American Welding Institute (AWS), TD Williams, National Association of Chemical Engineers, and Clock Spring, have programs which pertain to specific covered tasks.

Accepted vendors and industry programs are listed in the Motiva Covered Task list along with applicable AOC's.

Energy Worldnet

USERNAME

|

PASSWORD

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Operator Qualification (OQ) Rule

RESPONSIBILITIES AND CONSEQUENCES

Pipeline Operators (Motiva) must ensure:

- All individuals, who operate and maintain DOT pipeline facilities, are qualified to perform covered tasks.

Pipeline Operators (Motiva) are held responsible for:

- Ensuring ALL employees are qualified to perform covered tasks; This includes contractors, subcontractors, and other entities.

If the program is not followed:

- The Pipeline Safety, Regulatory Certainty, and Job Creation Act of 2011 increased the civil penalty authority of PHMSA to a maximum of **\$200,000** per violation per day, up to a maximum of **\$2,000,000** for a related series of violations.

THE QUALIFICATION PROCESS



How to Become Qualified



New London, Texas 1937



San Bruno, California

The DOT defined the word **QUALIFIED** as an individual who:

- Has been successfully evaluated
- Can perform assigned covered tasks and
- Can recognize and react to abnormal operating conditions (AOCs) that may be encountered during the performance of the covered task(s)

As defined by the DOT in §192.803 and §195.503:

Abnormal operating condition means a condition identified by the pipeline 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.

The Qualification Process

Motiva requires contractors to use a process for evaluation to ensure covered task qualification, including recognition of Abnormal Operating Conditions (AOC), and records retention that is acceptable to the company and in accordance with Subpart G of 49 CFR195 and Subpart N of 49 CFR 192. Contractor's qualifications should be provided and approved by the company prior to the commencement of any work

Evaluations must be performed in 1 to 1 settings.
Group evaluations should not be allowed.

Motiva recognizes qualifications of contractors through EWN and/or NCCER qualification process. Various vendor and industry organizations, such as American Petroleum Institute (API), American Society of Mechanical Engineers (ASME), American Welding Institute (AWS), TD Williams, National Association of Chemical Engineers, and Clock Spring, have programs which pertain to specific covered tasks.



EVALUATIONS



What is an Evaluation?

Operator Qualification (OQ) Definition

Per 49 CFR Part 192 & 195:

- *“An evaluation of an individual’s ability to perform a covered task and the process that assesses and documents the individual’s qualifications to perform the covered task.”*
- *“...should be an objective, consistent process...”*

A systematic process for assessing:

- Knowledge Gaps
- Effective Knowledge Transfer
- The quality, degree, and capacity of the candidate to demonstrate knowledge, skills, and abilities

Process Description

Individuals shall be evaluated over the covered tasks and must successfully pass the CBT examination assessments with a 80% score deemed as successful or unsuccessful. The performance evaluation requires 100% score to be successful.

Notification shall immediately be made to the Pipeline Supervisor, or designee, by any Company or Contractor providing oversight of a Qualified Individual, of any incident or accident involving a Qualified Individual that may bring that individual's qualified status into question or if they have any reason to believe that an individual is no longer qualified to perform the covered task. The Company may suspend an individual's qualifications at the verbal direction of an Operator with the understanding that the Operator will follow-up with written confirmation. All other requests must be in writing or email with the name and pertinent contact information of the individual requesting the suspension.

If based on the results of the investigation, the Qualified Individual becomes disqualified, he/she shall successfully complete appropriate training and be subject to the full evaluation process set forth in these procedures if he/she wishes to become qualified at a later date.

Re-qualification

The regulation requires the operator to determine the time intervals appropriate for re-qualification. The re-qualification intervals were considered and adopted through the Motiva Common Covered task list. For most tasks they do not exceed 36-month re-qualification. The interval begins on the date of the initial or most recent qualification. Qualification for welders shall be per API 1104 & the Motiva Welding manual requirements, with evaluation on recognizing and reacting to Abnormal Operation Conditions.

Re-Qualification will include at least one of the following evaluation methods:

- Task demonstration
- Task simulation
- Oral Discussions
- Knowledge examination
- Computer Based Training
- Other forms of assessment

Methods of Evaluation



Knowledge / Written Evaluations

Involves a written assessment to demonstrate knowledge



Oral Discussion

Involves a verbal review of the steps and standards required to perform a task. Discussion is used when knowing what to do and demonstrating relevant background knowledge is the most difficult and important part of the task. The Discussion verifies that the employee understands all steps required to perform a task and is able to recognize and respond to abnormal operating conditions.



Computer-Based Examination

The individual responds electronically to an electronic evaluation usually given in conjunction with Computer based Training.



Task Demonstration (Performance)

Used when knowing what to do is not the same as being able to do it. Tasks are performed as they normally are on the job. Qualifications that require performing the work often involve complex or precise physical execution.



Task Simulation

Used when performing the task would be ideal, but not feasible due to safety issues, equipment availability or disruption of operations. Off-line equipment, computer simulations or pointing and motioning replace actual task execution.

Disqualification

An individual's execution of a Covered Task contributed to an accident or incident as defined in the Motiva OQ program, or

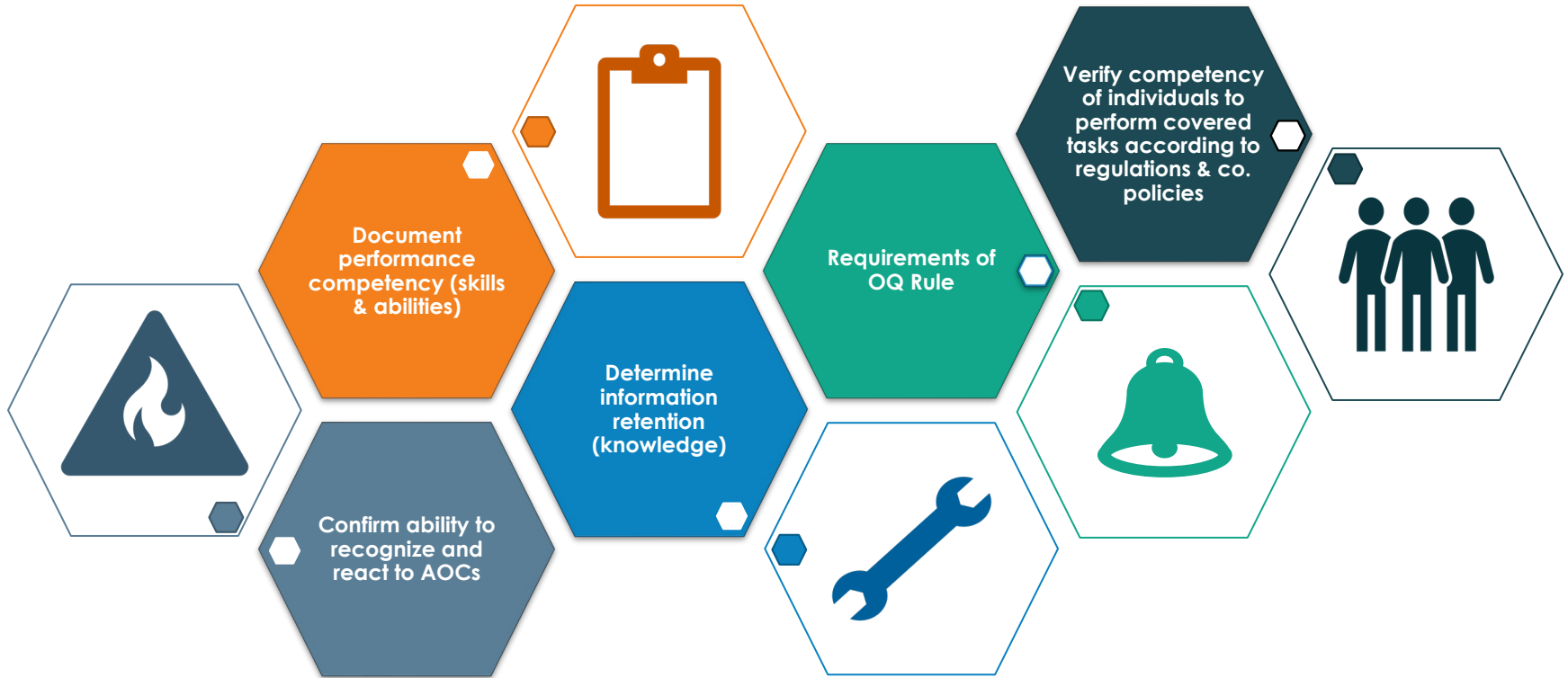
There is reason to believe that an individual should no longer be qualified to perform a covered task, including but not limited to:

- Loss of motor skills, vision, impairment, etc as evidenced by documentation from a physician, licensed practitioner or other licensed health care professional
- Observation of the individual
- Expired covered task based on re-qualification interval

An Authorized Evaluator or Supervisor has discretion to suspend the individual's qualification for the covered task(s) immediately, or at any time during the review.

Notification shall immediately be made to the Pipeline Supervisor, or designee, by any Company or Contractor providing oversight of a Qualified Individual, of any incident or accident involving a Qualified Individual that may bring that individual's qualified status into question or if they have any reason to believe that an individual is no longer qualified to perform the covered task.

Why Conduct Evaluations?



Evaluation Methods

REQUIREMENTS

Each evaluation must be conducted in a one-on-one setting. This means evaluating one person at a time:

- If performing multiple evaluations in the same day, do not have other candidates in the area to view or hear the evaluation being performed.
- You may have multiple people around i.e., inspector, auditor, qualified person to cover Span of Control (where applicable).

Evaluations **CANNOT** be conducted:

TWO AT A TIME



OVER THE PHONE



GROUP SETTINGS



SPAN OF CONTROL



Span of Control (SOC)

The OQ Rule allows that covered tasks may be performed by non-qualified individuals when directed and observed by qualified individuals.

Based on factors such as risk, frequency, and complexity, a Pipeline Operator (Motiva) may place limits on tasks performed by non-qualified individuals (Span of Control).

Evaluators are required to inform their candidates of the “Span of Control” limit(s).

Pipeline Operators (Motiva) are responsible for ensuring Span of Control on their jobsite.

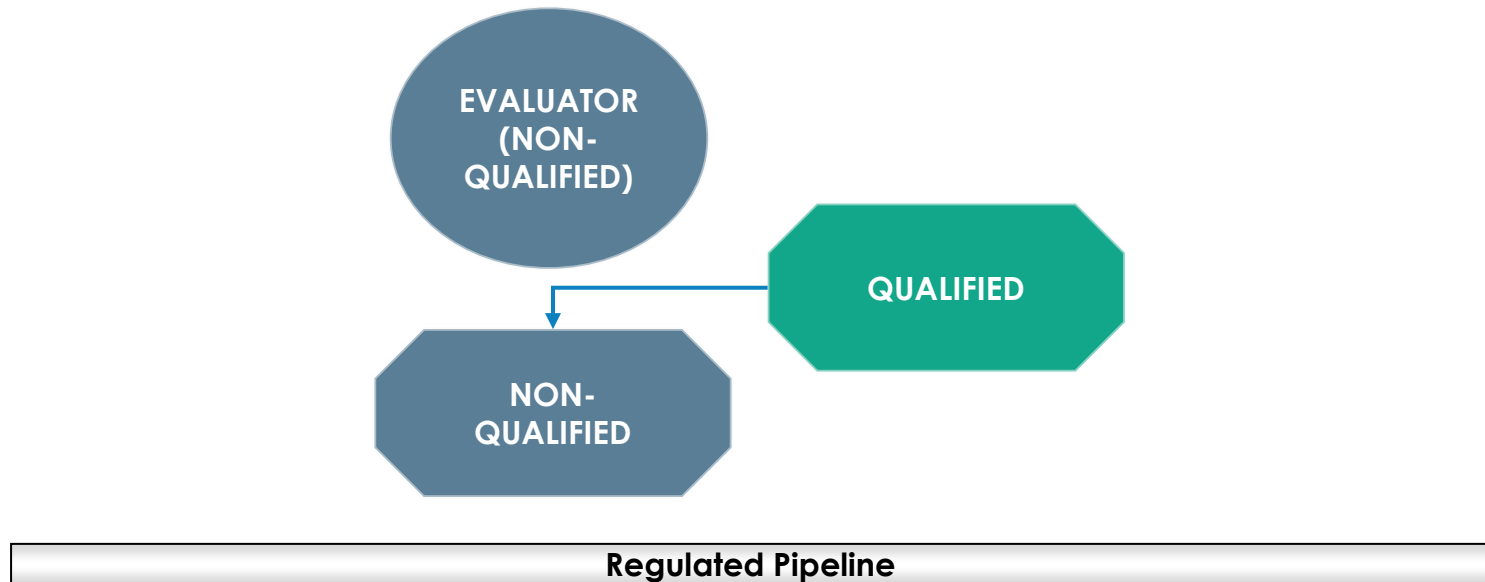
Motiva uses span of control only as a last resort effort; all other options shall be attempted to have every individual qualified before performing work on DOT assets.



Span of Control

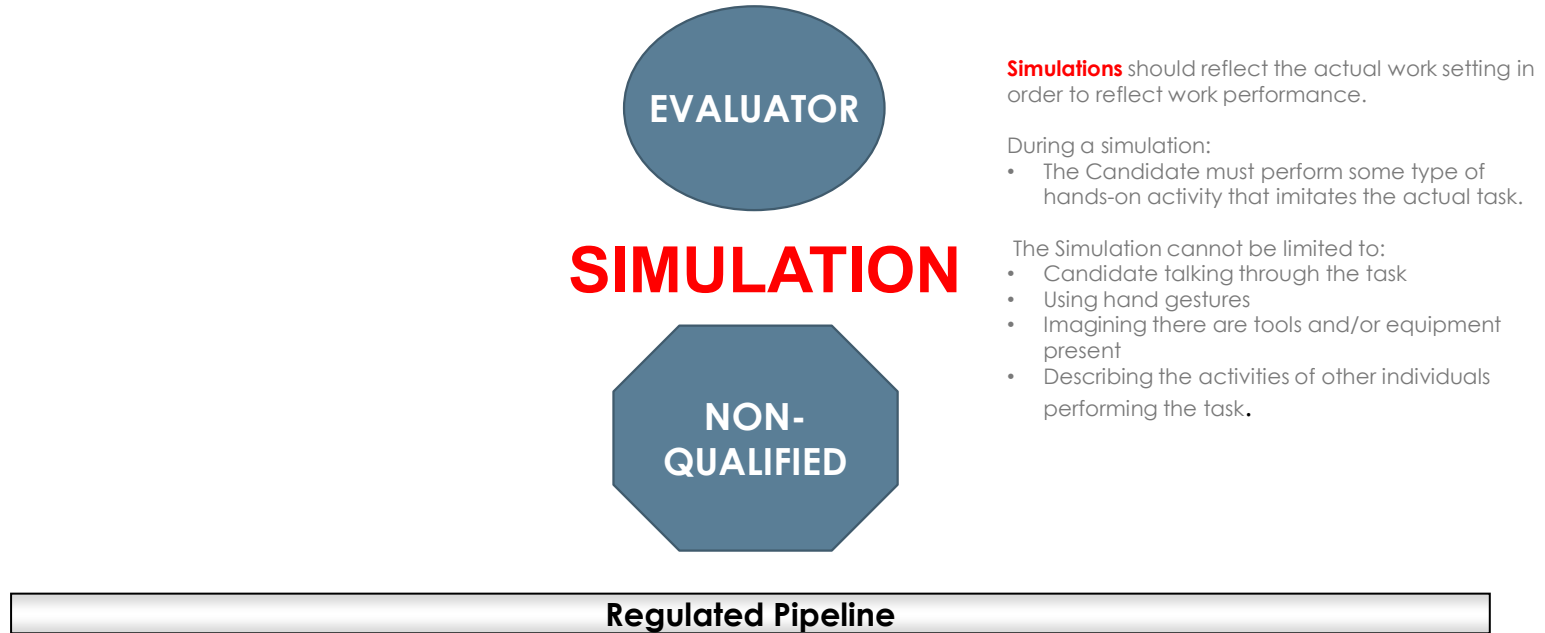
Question: How can a non-qualified Evaluator evaluate a non-qualified candidate on a regulated line?

(Assuming there is a Span of Control of 1:2)



Span of Control

Question: How can a Motiva Enterprises Evaluator evaluate a non-qualified candidate on a covered task where there is NO Span of Control?



EMERGENCY RESPONSE





Emergency Response

In emergency response situations, the priority is to dispatch qualified individuals to respond to the emergency condition; however, non-qualified individuals may be called upon to respond to an emergency condition to immediately protect life, property and the environment. When practical, reasonable guidance and direction should be provided to non-qualified individuals on the appropriate actions for stabilizing the emergency condition.

- Employee's whose normal job responsibilities include emergency response shall be qualified for the covered tasks they perform in responding to, stabilizing, or terminating an emergency condition.
- Tasks that are performed after the emergency condition has been stabilized or terminated shall be performed by qualified individuals or by non-qualified individuals under the direction and observation of qualified persons consistent with the span of control requirements identified in this policy.

Individuals that perform covered tasks through a mutual aid arrangement shall perform emergency response tasks consistent with the qualification requirements for emergency responders as described above.

DOCUMENTATION & RECORDKEEPING



The OQ Rule - Recordkeeping

49 CFR 192 & 195 Requirements

“The final rule also sets record keeping requirements that operators must follow to successfully demonstrate compliance, and the information that must be maintained on each person who has been evaluated and deemed qualified to work on a pipeline facility.”

“Each operator shall maintain records that demonstrate compliance with this subpart.

(a) Qualification records shall:

- 1) Identify qualified individuals**
- 2) Identify covered tasks the individual is qualified to perform**
- 3) Date(s) of current qualifications**
- 4) Qualification methods**

(b) Records....retained...5years.”

All contractors must subscribe to ISNetworld and all contract employees' records must be kept in ISNetworld database.



Who to Contact

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