



QQ

Qualified & Ready To Work

Dennis Kuhn – [dkuhn@astarinc.com](mailto:dkuhn@astarinc.com)

Why do we need Training and Qualification Rules?





















Lab  
Panel. C2

**CAUTION**  
**OSHA REGULATIONS**  
AREA IN FRONT OF  
**ELECTRICAL**  
**PANEL**  
MUST BE KEPT CLEAR  
FOR 36 INCHES



120/208

DO NOT  
TURN OFF  
BREAKERS  
THEY DO  
NOT WORK  
PROPERLY





A Moment to Remember



# Whatcom Falls Park in Bellingham, WA





# Bellingham, WA – Year 1999





# Bellingham, WA – Year 1999





# Moment To Remember



Liam Wood



Wade King



Stephen Tsiorvas



# Impact



**3**

Children who lost their  
lives

**\$45M+**

Property damage costs

**237K**

Gallons of gasoline  
spilled into Whatcom  
Creek

# OQ Rule



- The OQ rule stems from a mandate in 1992 and continued through Pipeline Safety Acts.
- Based on concerns from Congress, current event accidents, the Act of 1992, and again in 1996, the Office of Pipeline Safety developed regulations addressing OQ.





# OQ Rule



The intent of the OQ Rule is two-fold:

- 1) to ensure a qualified workforce on jurisdictional pipelines, and thereby,
- 2) reduce the probability and consequence of pipeline incidents or accidents caused by human error.

# OQ Rule



The OQ Rule provides an additional level of safety.

- Requires pipeline Operators to develop a written qualification program (OQ Plan) that will evaluate an individual's ability to perform covered tasks and to recognize and react to abnormal operating conditions that may occur while performing covered tasks on their facilities.
- As of October 28, 2003, operators are expected to have completed the required written qualification program and to have qualified all personnel who perform covered tasks.
- Qualification requirements are mandated for anyone performing covered tasks; internal employees and contract employees



## OOQ and Ready To Work

# OQ – Ready to Work

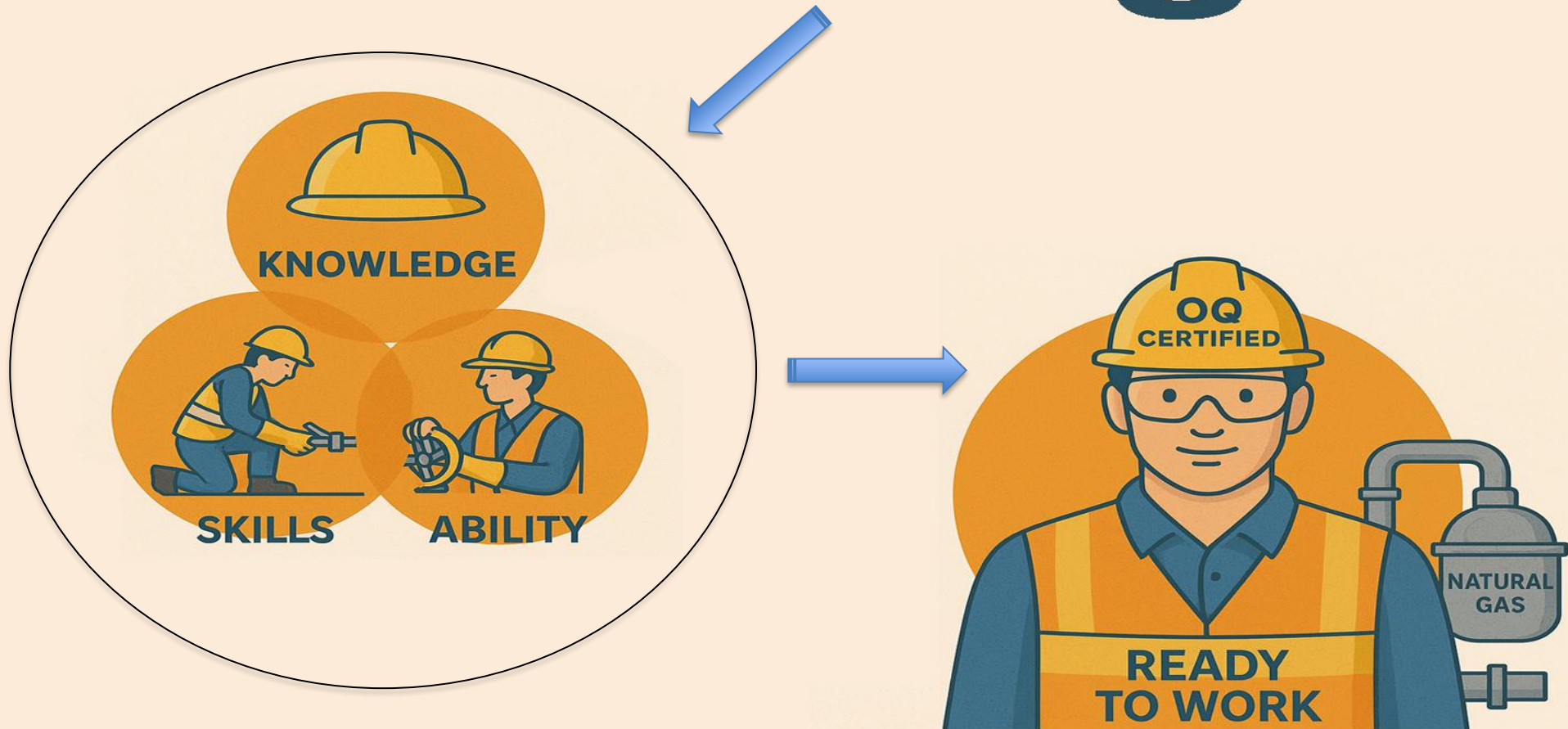


## Training

- An educational or instructional process (e.g., classroom, computer-based, or on-the-job) by which an individual's knowledge and skill level is developed and improved.
- Training is fundamental to implementing and success of the OQ rule requirements.



# Training



# OQ – Ready to Work



- **"Proper training"**: a commitment to a structured learning process designed to teach specific job-related skills. This could involve enrolling in formal training programs, attending workshops, or participating in on-the-job learning experiences.
- **"Structured training"**: a planned and organized approach to knowledge learning and skill development, often with defined goals, timelines, and a set curriculum.



# OQ – Ready to Work



What does the rule say about training requirements to OQ?

- **§192.805(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 ...
- **Inspection Protocol - 12.** Training Requirements (Initial, Retraining, and Reevaluation) Does the OQ program provide for initial qualification, retraining and reevaluation of individuals performing covered tasks? (TQ.OQ.TRAINING.P) 192.805(h)

# OQ – Ready to Work



## **FAQ7. How should training be incorporated in an operator's program? (§§ 192.805(h), 192.807, 195.505(h), 195.507)**

- Appropriate training is required to ensure that individuals performing covered tasks have the knowledge and skills needed to perform the tasks.
  - training should be incorporated in practices leading to the development and qualification of new employees, as well as practices that refresh the knowledge and skills of individuals with considerable experience.



# OQ – Ready to Work



**FAQ7. How should training be incorporated in an operator's program? (§§ 192.805(h), 192.807, 195.505(h), 195.507)**

- any significant change in the procedures. Training may also be required for equipment variations or differences.
- individuals who fail initial qualification or qualified individuals who fail requalification should be provided with appropriate remedial training in their areas of deficiency prior to reevaluation.

# OQ – Ready to Work



- Recent example - The Operator has extensive employee training and OQ program however:
  - Contractor(s) working for the Operator do not have any training outside of 3rd party OQ providers OQ training slides
  - Several contractors interviewed they take the OQ tests until they can pass
  - Once they have the OQ documentation they will learn OJT until foreman feels they can work on their own



# OQ – Ready to Work



- Recent Example of OQ Evaluator Training Issues?
  - Contractor Internal Evaluators had training on mechanics of conducting evaluations however, never worked or trained on task(s) they were evaluating on.
  - Proctors not trained on proper testing requirements.

# OQ – Ready to Work



- Review and monitor contractor(s) OQ training and Evaluations process.
- Determine and define minimum training requirements and requiring completion of the training, procedure review as a pre-requisite to being OQ evaluated.
- Include hands-on learning through on-the-job training or simulations.
- Review training to assure training is not designed to memorize the OQ test.



# OQ - Ready to Work



- Have a process to include training for equipment variations or differences.
- Have a process to communicate procedure changes that affect OQ covered functions.
- Periodically review contractor training programs and Evaluators.



- Define your process for qualified and ready to work.

**The following must be completed for individual to be considered ready to work**

Initial/subsequent training (Include OJT)	+	O&M Procedure review/acknowledgement	+	Successful OQ Evaluation	=	Qualified and ready to work
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- Ensure your process does not create an environment for “pencil whipping”.
- Do not rely on regulations for ensuring your safety.

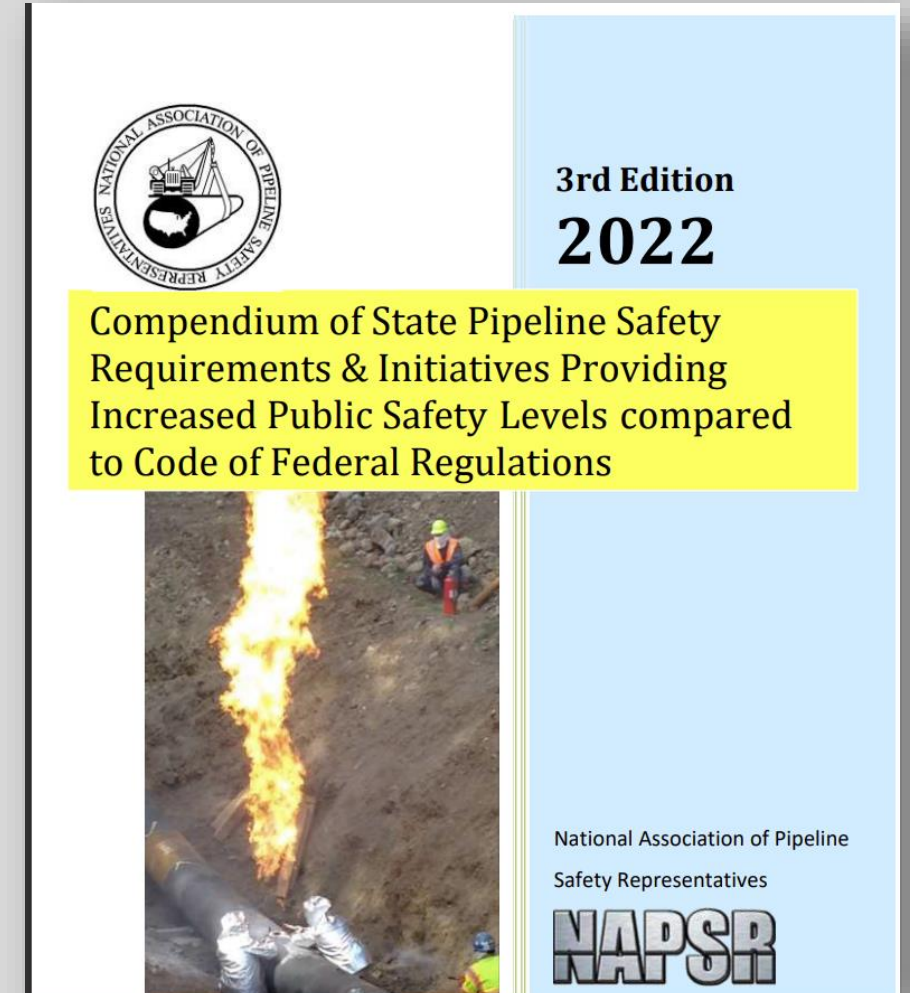


## State Level

# OQ – Changes



- States have the option to add/make more restrictive pipeline safety initiatives
- Most States have adopted and enforce more stringent regulations than the federal pipeline safety regulations.



# OQ – Changes



## NY

- 2017 Established OQ White Paper
- 2021 NPRM based on White Paper





# OQ – Changes



## NY

- March 2022 NY NPRM became Final Rule.
- In regulation March 2023.



# NY OQ Rule Changes - (16 NYCRR Part 255)



Changes to the 4-part test:

- Covered tasks are all activities, identified by the operator, that:
  - are performed on a pipeline facility; and
  - affect the operation or integrity of the pipeline.
- OQ Program Effectiveness Reviews
  - develop program measures to determine the effectiveness of the qualification program.

# NY OQ Rule Changes - (16 NYCRR Part 255)



- Detail the training requirements, including the minimum training needed per covered task
  - Shall include on-the-job training that includes hands-on learning or simulations.
  - Evaluations shall not be conducted within 48 hours of training.





# OQ – Changes



- New York – In regulation March 2023 (16 NYCRR Part 255)
- MA, CT – proposing new regulations
- NE, MI – considering changes
- NJ – 2 Part Test
  - N.J.A.C. 14:7-1.1A Added definition:
  - Covered task means: an activity, identified by the operator, that is performed on a pipeline facility and affects the operation, safety, or integrity of the pipeline.
- IN – Revisions to 49 CFR 192.805(h) 195.505(h) – Training - Effective July 3, 2023

# OQ – Changes



- We may see other states contemplate taking actions to improve Operator Qualification Programs at the State level.
- If your state has no added requirements or takes no additional regulatory actions ... do we really need a rule to ensure or mandate safety?



# OOQ – Ready to Work



**Questions?**

**Thank You**

**Dennis Kuhn, Vice President, Compliance**

[dkuhn@astarinc.com](mailto:dkuhn@astarinc.com)

[www.astarinc.com](http://www.astarinc.com)

325-660-8914