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September 7, 2007

U.S. Department of Transportation
**Pipeline and Hazardous Materials
Safety Administration**
12300 W. Dakota Ave. Suite 110
Lakewood, CO 80228

Subject: Response to Operator Qualification Program Inadequacies

Dear Mr. Hoidal:

In response to your letter of August 3, 2007 pertaining to inadequacies that your agency discovered in our Operator Qualification Program, I have addressed each of the four items as they were listed in your letter. The following four items will be added to our Operator Qualification Program which is a component of our Standard Operations and Maintenance Manual for Gas Pipelines:

1. Part 192.805(b) Ensure through evaluation that individuals performing covered tasks are qualified:

Enclosed you will find copies of Greka's Employee Task Evaluation Records.

2. Part 192.805(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:

Non-qualified individuals performing tasks under a qualified individual have several restrictions placed on them:

- a. Restricted access to DOT records.
- b. Restricted access to lock combinations on valve boxes.
- c. Restricted from operating backhoes and excavators on DOT pipelines.

3. Part 192.805(f) Communicate changes that affect covered tasks to individuals performing these covered tasks:

Program changes, modifications or revisions will be done annually and mailed to the Department.

come annually and a new subsection of Evaluator Criteria, 6.4.6 will be added to reflect annual reevaluation.

I hope this has addressed all your concerns relative to Greka's Operator Qualification Program. If you have any questions, please contact me at the phone number below my signature.



Al Wedderburn
Manager, Quality Assurance
Greka
Office: 805-357-2954
Mobile: 805-331-4171

Enclosures: Operator Qualification Record

OPERATOR QUALIFICATION RECORD

Individual: RAY MARGOLIN



Date of Qualification	Method of Qualification	Covered Task	O&M Manual Section
3-24-75	OJT	recognize and react to abnormal operating conditions.	0.9 Operator Qualification Program
9-24-99	CERT	initiate report when a possible Safety Related Condition is observed	1.02 Reporting Of Safety Related Conditions
10-26-96	TRANS	marks lines as required for Dig Alert tickets	3.01 Damage Prevention Program
10-26-96	TRANS	perform continuing surveillance along pipeline segments, observe potential problems.	5.01 Continuing Surveillance
1-1-03	VF	conduct gas leak detection surveys with instrumentation	5.02 Leak Detection W/ Inst For Pipelines Without Odorant
3-24-75	OJT	conduct gas leak detection surveys without instrumentation	5.03 Pipeline Patrolling/Leak Survey W/O Instrumentation
10-26-96	OJT	install and maintain pipeline markers and signs	5.04 Pipeline Markers And Signs
10-26-96	TRANS	conduct and document atmospheric corrosion inspections	6.01 Atmospheric Corrosion
10-26-96	TRANS	perform routine CP system testing and document results	6.05 Cathodic Protection-External Corrosion Control
6-01-77	OJT	perform and document rectifier inspections	6.07 Impressed Current Power Source Inspection
3-24-95	TRANS	conduct routine corrosion control program testing and monitoring	6.10 Corrosion Control Program Review
6-01-77	OJT	inspection and test operation of emergency valves	7.01 Emergency Valve Maintenance
6-01-77	TRANS	perform and document routine inspections of pressure limiting devices	7.02 Pressure Regulators And Relief Devices
3-24-95	OJT	valve boxes and vault inspection	7.03 Valve Boxes And Vaults
6-30-93	TRANS	perform and document periodic odorant testing	11.01 Odorization Of Gas
3-24-95	TRANS	provide locks or other security measures to prevent unauthorized operation of valves.	14.01 Valve Security
9-24-99	CERT	continually minimize the possibility of accidental gas ignition	14.03 Prevention Of Accidental Ignition

Methods of Qualification

✓ Trans = Transitional Qualification allowed for satisfactory performance of covered task between October 26, 1996 and October 26, 1999

✓ WE = Written Exam

✓ VE = Verbal exam

✓ WH = Review of work history performance

✓ Cert = certificate from a trade school, university, craft, safety training, professional organization, vendor/manufacturer

✓ OJT = On-the-Job Training

Sim = Satisfactory performance during task simulation

OPERATOR QUALIFICATION RECORD

Individual: JOE CUSHAWAY



Date of Qualification	Method of Qualification	Covered Task	O&M Manual Section
6-24-85	OJT	recognize and react to abnormal operating conditions.	0.9 Operator Qualification Program
12-07-02	CEAS	initiate report when a possible Safety Related Condition is observed	1.02 Reporting Of Safety Related Conditions
9-30-02	OJT	marks lines as required for Dig Alert tickets	3.01 Damage Prevention Program
6-14-85	OJT	perform continuing surveillance along pipeline segments, observe potential problems.	5.01 Continuing Surveillance
1-1-03	VE	conduct gas leak detection surveys with instrumentation	5.02 Leak Detection W/ Inst For Pipelines Without Odorant
1-1-03	VE	conduct gas leak detection surveys without instrumentation	5.03 Pipeline Patrolling/Leak Survey W/O Instrumentation
10-26-96	TRANS	install and maintain pipeline markers and signs	5.04 Pipeline Markers And Signs
10-26-96	TRANS	conduct and document atmospheric corrosion inspections	6.01 Atmospheric Corrosion
10-26-96	TRANS	perform routine CP system testing and document results	6.05 Cathodic Protection-External Corrosion Control
10-26-96	TRANS	perform and document rectifier inspections	6.07 Impressed Current Power Source Inspection
10-26-96	TRANS	conduct routine corrosion control program testing and monitoring	6.10 Corrosion Control Program Review
6-14-85	OJT	inspection and test operation of emergency valves	7.01 Emergency Valve Maintenance
9-30-02	VE	perform and document routine inspections of pressure limiting devices	7.02 Pressure Regulators And Relief Devices
9-30-02	VE	valve boxes and vault inspection	7.03 Valve Boxes And Vaults
9-30-02	OJT	perform and document periodic odorant testing	11.01 Odorization Of Gas
9-30-02	OJT	provide locks or other security measures to prevent unauthorized operation of valves.	14.01 Valve Security
12-07-02	CEAS	continually minimize the possibility of accidental gas ignition	14.03 Prevention Of Accidental Ignition

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OPERATOR QUALIFICATION RECORD

Individual: Fernando LOERA

Date of Qualification	Method of Qualification	Covered Task	O&M Manual Section
1-1-05	OJT	recognize and react to abnormal operating conditions.	0.9 Operator Qualification Program
2/19/05	CERT	initiate report when a possible Safety Related Condition is observed	1.02 Reporting Of Safety Related Conditions
1-1-05	OJT	marks lines as required for Dig Alert tickets	3.01 Damage Prevention Program
1-1-05	OJT	perform continuing surveillance along pipeline segments, observe potential problems.	5.01 Continuing Surveillance
11-14-04	OJT	conduct gas leak detection surveys with instrumentation	5.02 Leak Detection W/ Inst For Pipelines Without Odorant
11-14-04	OJT	conduct gas leak detection surveys without instrumentation	5.03 Pipeline Patrolling/Leak Survey W/O Instrumentation
1-1-05	OJT	install and maintain pipeline markers and signs	5.04 Pipeline Markers And Signs
1-1-05	VE	conduct and document atmospheric corrosion inspections	6.01 Atmospheric Corrosion
9-15-05	OJT	perform routine CP system testing and document results	6.05 Cathodic Protection-External Corrosion Control
9-15-05	OJT	perform and document rectifier inspections	6.07 Impressed Current Power Source Inspection
1-1-05	OJT	conduct routine corrosion control program testing and monitoring	6.10 Corrosion Control Program Review
1-1-05	OJT	inspection and test operation of emergency valves	7.01 Emergency Valve Maintenance
1-1-05	OJT	perform and document routine inspections of pressure limiting devices	7.02 Pressure Regulators And Relief Devices
1-1-05	OJT	valve boxes and vault inspection	7.03 Valve Boxes And Vaults
1-1-05	OJT	perform and document periodic odorant testing	11.01 Odorization Of Gas
1-1-05	OJT	provide locks or other security measures to prevent unauthorized operation of valves.	14.01 Valve Security
4/5/05	CERT	continually minimize the possibility of accidental gas ignition	14.03 Prevention Of Accidental Ignition

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OPERATOR QUALIFICATION RECORD

Individual: *Mike Redstone*



Date of Qualification	Method of Qualification	Covered Task	O&M Manual Section
8-25-05	OJT	recognize and react to abnormal operating conditions.	0.9 Operator Qualification Program
8-24-05	VE	initiate report when a possible Safety Related Condition is observed	1.02 Reporting Of Safety Related Conditions
3-26-05	Sim	marks lines as required for Dig Alert tickets	3.01 Damage Prevention Program
11-14-04	OJT	perform continuing surveillance along pipeline segments, observe potential problems.	5.01 Continuing Surveillance
11-14-04	OJT	conduct gas leak detection surveys with instrumentation	5.02 Leak Detection W/ Inst For Pipelines Without Odorant
11-14-04	OJT	conduct gas leak detection surveys without instrumentation	5.03 Pipeline Patrolling/Leak Survey W/O Instrumentation
6-10-04	OJT	install and maintain pipeline markers and signs	5.04 Pipeline Markers And Signs
6-10-04	VE	conduct and document atmospheric corrosion inspections	6.01 Atmospheric Corrosion
9-15-05	OJT	perform routine CP system testing and document results	6.05 Cathodic Protection-External/Corrosion Control
9-15-05	OJT	perform and document rectifier inspections	6.07 Impressed Current Power Source Inspection
11-1-04	OJT	conduct routine corrosion control program testing and monitoring	6.10 Corrosion Control Program Review
9-01-05	OJT	inspection and test operation of emergency valves	7.01 Emergency Valve Maintenance
11-1-04	Sim	perform and document routine inspections of pressure limiting devices	7.02 Pressure Regulators And Relief Devices
9-01-05	OJT	valve boxes and vault inspection	7.03 Valve Boxes And Vaults
11-14-04	OJT	perform and document periodic odorant testing	11.01 Odorization Of Gas
9-01-05	OJT	provide locks or other security measures to prevent unauthorized operation of valves.	14.01 Valve Security
8-24-05	VE	continually minimize the possibility of accidental gas ignition	14.03 Prevention Of Accidental Ignition

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OPERATOR QUALIFICATION RECORD



Individual: MICHAEL WURTH

Date of Qualification	Method of Qualification	Covered Task	O&M Manual Section
11-29-06	OJT	recognize and react to abnormal operating conditions.	0.9 Operator Qualification Program
11-13-06	CERT	initiate report when a possible Safety Related Condition is observed	1.02 Reporting Of Safety Related Conditions
11-29-06	Sim	marks lines as required for Dig Alert tickets	3.01 Damage Prevention Program
11-29-06	WH	perform continuing surveillance along pipeline segments, observe potential problems.	5.01 Continuing Surveillance
9-12-06	OJT	conduct gas leak detection surveys with instrumentation	5.02 Leak Detection W/ Inst For Pipelines Without Odorant
9-12-06	OJT	conduct gas leak detection surveys without instrumentation	5.03 Pipeline Patrolling/Leak Survey W/O Instrumentation
9-20-06	OJT	install and maintain pipeline markers and signs	5.04 Pipeline Markers And Signs
1-15-07	OJT	conduct and document atmospheric corrosion inspections	6.01 Atmospheric Corrosion
4-10-07	OJT	perform routine CP system testing and document results	6.05 Cathodic Protection-External Corrosion Control
4-12-07	OJT	perform and document rectifier inspections	6.07 Impressed Current Power Source Inspection
1-16-07	OJT	conduct routine corrosion control program testing and monitoring	6.10 Corrosion Control Program Review
9-12-06	OJT	inspection and test operation of emergency valves	7.01 Emergency Valve Maintenance
6-30-08	TRANS	perform and document routine inspections of pressure limiting devices	7.02 Pressure Regulators And Relief Devices
9-12-06	OJT	valve boxes and vault inspection	7.03 Valve Boxes And Vaults
9-12-06	OJT	perform and document periodic odorant testing	11.01 Odorization Of Gas
9-12-06	OJT	provide locks or other security measures to prevent unauthorized operation of valves.	14.01 Valve Security
9-12-06	OJT	continually minimize the possibility of accidental gas ignition	14.03 Prevention Of Accidental Ignition

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