

SENT TO COMPLIANCE REGISTRY

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May 1, 2012

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CONSOLIDATED RESPONSE TO: NOTICE OF PROBABLE VIOLATION AND PROPOSED COMPLIANCE ORDER – CPF 5-2012-0005

NOTICE OF AMENDMENT - CPF 5-2012-0006M

Dear Mr. Hoidal:

On April 3, 2012, the City of Palo Alto (City) received two letters from the Pipeline and Hazardous Materials Safety Administration (PHMSA) regarding the results of an inspection of the City's Operator Qualification (OQ) Program conducted by PHMSA personnel at the City's offices on February 14-17, 2011. The first letter, titled Notice of Probable Violation and Proposed Compliance Order – CPF 5-2012-0005 (Notice), enumerated four Probable Violations and presented a Proposed Compliance Order to remediate the four Probable Violations and document and report costs associated with fulfilling the Proposed Compliance Order. The second letter, titled Notice of Amendment – CPF 5-2012-0006M, enumerated four additional Probable Violations and did not include a Proposed Compliance Order.

The City is committed to maintenance of a comprehensive and effective OQ Program and looks forward to working with PHMSA to address the matters identified in the Notice and Amendment. The following sections present the City's response to each Probable Violation and describe the actions the City proposes to take or has already taken to remediate the identified matters. The Notice will be addressed first, followed by the Amendment.

Notice of Probable Violation and Proposed Compliance Order – CPF 5-2012-0005

Probable Violation #1-N, §192.805(b) Qualification Program

The City does not contest the Compliance Order for this Probable Violation. PHMSA requests that the City modify the OQ Plan to identify task specific Abnormal Operating Conditions (AOC) and to require that all qualified individuals performing covered tasks recognize and react to these task specific AOC's. The City will revise the OQ Plan to include task specific AOC's for each covered task and amend the training content for each covered task to include recognition of and reaction to task specific AOC's.

Probable Violation #2-N §192.805(c) Qualification Program

The City completed the Compliance Order's requirements for this item on March 2nd, 2011. PHMSA requests that the City revise the OQ Plan to include a defined span of control whereby non-qualified individuals may perform covered tasks under observation and direction of a qualified individual. In response to comments made by the PHMSA inspector at the time of the OQ Inspection, the City updated the OQ Plan and issued a revised version in March 2011. (See Exhibit 1). The March 2011 Plan's Section 1.4.1, "When Non-Qualified Individuals May Perform a Covered Task", sets a span of control of four non-qualified individuals to one qualified individual. On March 2nd, 2011, Utilities Operations Manager Javad Ghaffari sent the March 2011 version to PHMSA staff. (See Exhibit 2). PHMSA staff acknowledged receipt of the revised OQ Plan on the same date. (See Exhibit 3). As the March 2011 version of the OQ Plan has been effective since March 2nd, 2011, the City has addressed and rectified Probable Violation #2-N.

Probable Violation #3-N §192.805(b) Qualification Program

The City completed the Compliance Order's requirements for this item on March 4, 2011. PHMSA asserts that for the period March 3 through October 27, 2010, nine individuals performed 41 fusion bonds without proper qualification. PHMSA requests that the City conduct a leak survey of the 41 fusion bond locations. During the February 2011 inspection, the City presented evidence that only three of the nine individuals were not properly qualified under the terms of the OQ Plan then in effect. The City agrees that five of the 41 fusion bonds were performed by non-qualified individuals and, in the interest of protecting system safety and integrity, the City dug up and completely removed and qualified personnel reinstalled all five fusion bonds in 2011. (See Exhibit 4). Further, during the normal course of distribution system operations, the City leak surveyed 20 of the 41 locations in 2011, and all remaining locations will be leak surveyed in 2012. Thus, as of March 4, 2011, the City addressed and rectified Probable Violation #3-N.

Probable Violation #4-N §192.805(d) Qualification Program

The City does not contest the Compliance Order for this Probable Violation. PHMSA observes that the OQ Plan does not include specific language that allows for the immediate suspension, pending evaluation of performance of the covered task, of an individual who performed a covered task that may have contributed to an incident. The City will amend Section 1.5.1 of the OQ Plan by adding the following sentence:

“The individual will be immediately suspended from performance of the covered task pending the outcome of the individual’s covered task performance evaluation.”

Documentation of Safety Improvement Costs

The City does not contest the Compliance Order’s requirements for this item. Item 6 of the Proposed Compliance Order requests the City to document and report the safety improvement costs associated with fulfilling the Proposed Compliance Order. It is requested that these costs be reported in two categories: 1) total cost associated with preparation/revision of plans, procedures, studies and analyses, and 2) total cost associated with replacement, additions and other changes to pipeline infrastructure. The City agrees to supply this information as requested.

Notice of Amendment – CPF 5-2012-0006M

Probable Violation #1-A §192.805(a) Qualification Program

The City does not contest this Probable Violation. PHMSA requests that the City add “excavation” as a covered task to the OQ Plan. Following the process contained in the OQ Plan, the City will amend the OQ Plan to add “excavation” to the list of covered tasks.

Probable Violation #2-A §192.805(b) Qualification Program

The City does not contest this Probable Violation. PHMSA observes that the OQ Plan is not specific on how the various qualification methods will be used and that there is no information regarding the written or oral exam process including prerequisites, training materials, who administers the exam or passing requirements. PHMSA requests that the OQ Plan be expanded to add specific processes identifying details that clarify the steps personnel need to follow to become qualified. The City agrees to expand the OQ Plan as requested.

Probable Violation #3-A §192.805(g) Qualification Program

The City does not contest this Probable Violation. PHMSA notes that the OQ Plan (Section 1.2.6.1) refers to a requalification interval not to exceed five

years for covered tasks while Part IV, Appendix D (of the December 2010 version of the OQ Plan) refers to requalification intervals of annual, 24 or 36 months. Appendix D was modified in the March 2011 version to have a not to exceed five year requalification interval for all covered tasks. The City will modify the OQ Plan to identify a specific requalification interval for each covered task (annual, 24 or 36 month interval)

Probable Violation #4-A §192.805(h) Qualification Program

The City does not contest this Probable Violation. PHMSA states that the OQ Plan has no training provisions for initial and/or requalification of individuals performing covered tasks and that, while training is addressed by reference in several places, there are no specific methods or procedures for training provided. Because Probable Violation #4-A appears closely related to Probable Violation #2-A, the City will address Probable Violation #4-A in the OQ Plan expansion which will be completed as part of the City's remediation of Probable Violation #2-A.

The City requests clarification of one procedural matter. The Notice, in the Proposed Compliance Order – Item 5, gives the City 60 days after receipt of a Final Order to complete remediation of Probable Violations #1-N through #4-N. The Amendment gives the City 60 days from receipt of the Amendment to submit amended procedures remediating Probable Violations #1-A through #4-A. These time periods are different. The City requests that PHMSA issue a single Final Order that includes all eight Probable Violations and the request for cost information, and which asks that all items be completed no later than 60 days after receipt of the Final Order.

The City expects that the actions already taken and proposed, will, when complete, fully remediate all the identified Probable Violations. I want to reiterate that it is the City's policy to work effectively with its regulators to resolve matters in contention. If you need further information or have any questions, please contact me or the Utilities Compliance Manager, Eric Scott (at 650-566-5443 or eric.scott@cityofpaloalto.org).

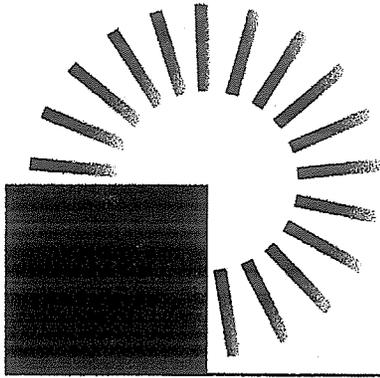
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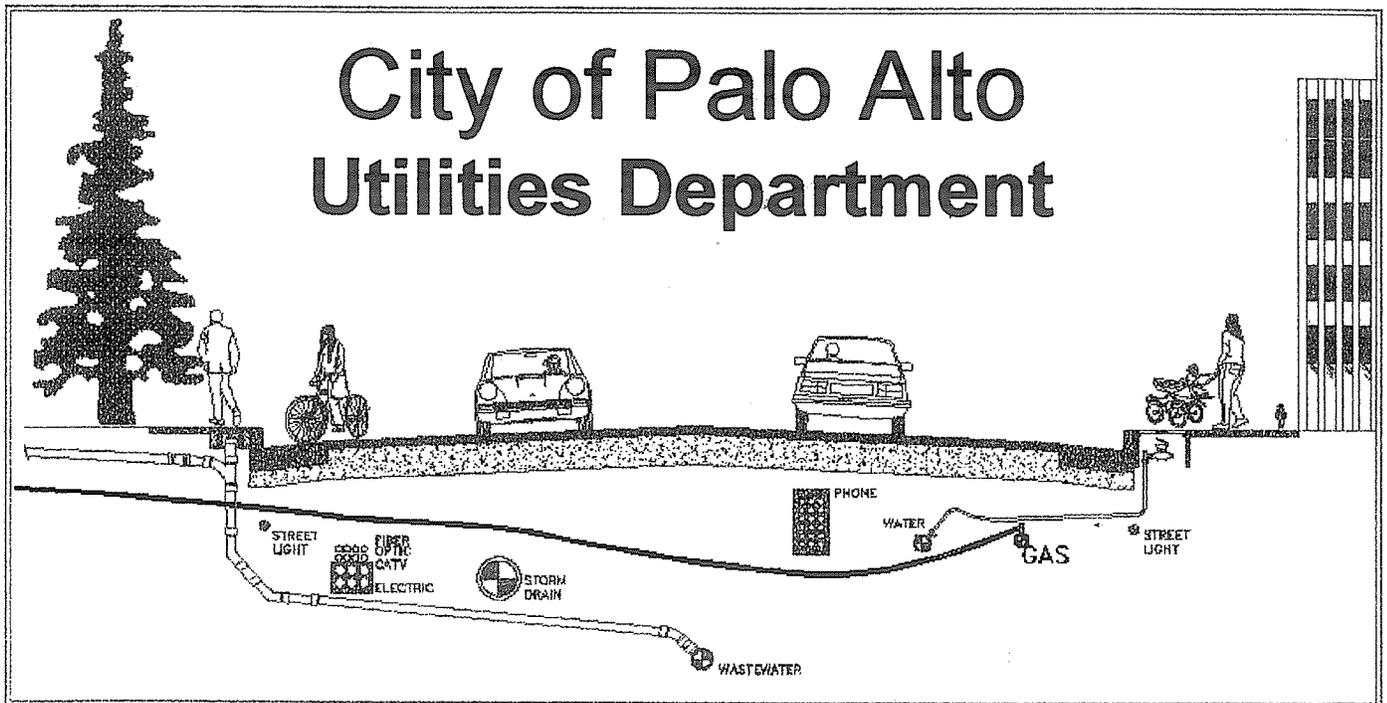
Valerie O. Fong
Utilities Director

Exhibits

cc: James Keene, City Manager
Molly Stump, City Attorney



CITY OF PALO ALTO
UTILITIES



Utilities Gas Operator Qualification Plan

CITY OF PALO ALTO UTILITIES GAS OPERATOR QUALIFICATION PLAN

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PART I
PLAN OVERVIEW

1.1 Introduction

1.1.1 Purpose and Objectives

The City of Palo Alto Utilities Gas Operator Qualification Plan outlines the City's responsibilities and procedures to ensure that it has a qualified workforce and that its operations comply with relevant Federal Pipeline Safety Regulations.

Title 49 Code of Federal Regulations (CFR) Part 192, Subpart N requires that all individuals who operate and maintain pipeline facilities:

- be qualified to operate and maintain the pipeline facilities, and
- have the ability to recognize and react appropriately to abnormal operating conditions that may indicate a dangerous situation or a condition exceeding design limits.

To ensure compliance with these regulations, The City has adopted this Utilities Gas Operator Qualification Plan (referred to as the plan). The City will make its employees and other individuals who may perform tasks covered under the regulations set forth in 49 CFR Part 192 Subpart N aware of the regulatory requirements and the contents of this plan. This plan and its exhibits identify relevant operating and maintenance tasks (covered tasks), provide guidance for achieving compliance with the requirements of 49 CFR Part 192 Subpart N, establish qualification methods for performing covered tasks on a gas pipeline facility, and establish guidelines for maintaining necessary records to administer this plan.

1.1.2 Definitions

Abnormal Operating Condition (AOC): a condition identified by the operator that may indicate a malfunction of a component or a deviation from normal operations that may indicate:

- a condition exceeding design limit; or
- result in hazard(s) to persons, property, or the environment.

The examples of AOCs are listed at the end of this section.

Covered Task: a task that is:

- performed on a pipeline facility;
- an operations or maintenance task;
- performed pursuant to a requirement in 49 CFR Part 192; and affected by the operation or integrity of the pipeline.

CS: Customer Service.

Continued on next page

Incident: any of the following events as defined in 49 CFR Part 191.3:

1. An event that involves a release of gas from a pipeline and
 - (i) a death, or personal injury necessitating in-patient hospitalization; or
 - (ii) estimated property damage including cost of gas lost, of the operator or others, or both, of \$50,000 or more.
2. An event that is significant, in the judgment of the operator, even though it did not meet the criteria of paragraph (1).

Individual: an employee of the City of Palo Alto Utilities or a representative of the City who, on behalf of the City, performs one or more covered tasks.

M&I: monitoring and inspection

OJT: on-the-job training.

O&M: Operation, Inspection and Maintenance

Operator: owner of gas pipeline facilities, i.e., The City of Palo Alto.

Pipeline Facility: all parts of those physical facilities, owned and operated by the City, through which gas moves in the course of distribution.

Qualified: an individual who has been evaluated and is able to properly perform a covered task(s), and recognize and react to abnormal operating conditions that may be encountered during the performance of the covered task(s).

SGOQPC: System Gas Operator Qualification Plan Coordinator. (Individual will be an employee in UO.)

Subtask: series of steps (activities) that by themselves does not lead to a meaningful outcome.

Task: series of actions leading to a meaningful outcome.

UO: Utility Operations.

WGW: Water/Gas/Wastewater

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1.1.2.1 Example of Abnormal Operating Conditions

- Pressure Related Conditions
 1. Uncontrolled or unauthorized leakage of natural gas.
 2. Pipeline pressure deviations exceeding design limits.
 3. Conditions requiring shutdown or pressure reduction in a pipeline.

- Material / Equipment Failure Conditions
 1. Material failure or defect.
 2. Malfunctioning component or component failure.
 3. Loss of protection on the pipeline.

- Facility Damage Conditions
 1. Pipeline system damage
 2. Unintended movement or abnormal loading on the pipeline.

- Facility Instrumentation or Control System Conditions
 1. Emergency alarms.
 2. Activation of a pipeline safety device.
 3. Unexplained gas facility status change.

1.1.3 Covered Tasks

The City conducted a job task analysis of activities performed on its pipeline facilities. A four-part test (set forth in 49 CFR Part 192.801) was used for each of the identified activities to determine which activities were covered tasks.

1. Is the task performed on a pipeline facility?
2. Is the task an operations or maintenance task?
3. Is the task performed as a requirement of 49 CFR Part 192?
4. Does the task affect the operation or integrity of the pipeline?

If all four answers to the above questions were YES, the activity is a covered task.

A list of covered tasks is available in Part IV, Appendix C of this plan.

1.1.4 Plan Elements

The plan:

- a) identifies covered tasks
 - b) ensures that individuals performing covered tasks are qualified
 - c) ensures that non-qualified individuals performing a covered task are supervised by a qualified individual
 - d) includes a process to determine if an individual's performance contributed to an incident defined in 49 CFR Part 191 and WGW Operations' *Operation, Inspection and Maintenance Manual* and the *Gas Emergency Operating Plan*.
 - e) includes a process to evaluate an individual if the operator has reason to believe that the individual is no longer qualified to perform a covered task
 - f) includes a procedure for communicating changes that affect covered tasks to individuals performing those tasks
 - g) identifies those covered tasks and the required intervals for subsequent qualification
 - h) specifies record keeping requirements necessary for compliance
-

1.1.5 Scope of Plan

The scope of the gas operator qualification plan applies to Utility Operations and WGW Engineering.

1.1.6 Plan Distribution

The holders of the City of Palo Alto Utilities Gas Operator Qualification Plan include:

- Assistant Director of Utilities Operations
 - Manager, Water/Gas/Wastewater Operations
 - Manager, Water/Gas/Wastewater Engineering
 - System Gas Operator Qualification Plan Coordinator (SGOQPC)
 - Supervisor, Water/Gas/Wastewater
-

1.1.7 Responsible Parties, Plan Development, and Updates

This section defines the individuals responsible for the Utilities Gas Operator Qualification Plan and its maintenance and updates.

Director of Utilities is charged with the authority and responsibility for the gas operator qualification plan and with the qualification and training of gas personnel performing covered tasks on pipeline facilities.

Assistant Director of Utilities, Operations is charged with the authority and responsibility of ensuring the qualification and training of gas personnel performing covered tasks of gas pipeline facilities.

Manager, WGW Operations, is responsible for the qualification and training of gas employees performing covered tasks on pipeline facilities in the division and will perform annual audits on Operator Qualification records. The Manager will appoint a System Gas Operator Qualification Plan Coordinator(s) (SGOQPC) to maintain the plan in the Department. Appointment of the SGOQPC is to be documented in Part V of the plan's reference documents.

SGOQPC maintains the City of Palo Alto Utilities Gas Operator Qualification Plan and policies. The SGOQPC is responsible for:

- reviewing the department manager/supervisors' documentation of skill evaluations
- distributing up-to-date copies of the plan to the appropriate personnel as needed
- making the plan available for inspection by authorized agents at regulatory agencies
- providing notification to employees and management in advance of the date of employees' expiration of qualification
- continually reviewing the plan and periodically updating it as needed
- providing coordination between divisions
- providing status reports
- ensuring proper documentation is recorded in database(s)
- developing the operator qualification plan

Continued on next page

- monitoring the plan implementation and progress
- maintaining the plan and its appendices
- adding and/or removing personnel from the covered tasks list
- determining if new work procedures are covered by this Rule
- ensuring coordination with other divisions for re-qualifying and training of their personnel.
- submitting documentation to the appropriate Coordinator, Utility Projects for entry into database.
- maintaining copies of the qualifications
- coordinating qualification activities between supervisors and emergency coordinators (emergency call-out list).

In the event of a significant change being made to the plan, a copy of the revised plan will be forwarded to the Pipeline and Hazardous Material Safety Administration (PHMSA) or appropriate state agency for review. Significant changes could include (but are not necessarily limited to) the:

- change in the number of covered tasks identified by the operator
- a change in the evaluation methods or criteria for performing covered tasks
- wholesale changes made to the plan due to merger or acquisition.

All employees are responsible for knowing and understanding the gas operator qualification plan. All employees are also responsible for performing without supervision *only* those covered tasks for which they have been qualified under this plan. Refer to Section 1.4 of the plan for non-qualified individuals.

Any employee observing any non-qualified person performing a covered task must immediately report this and each such subsequent occurrence to the SGOQPC. All employees are also responsible for communicating to immediate supervision any significant changes that affect covered tasks they are assigned to perform.

All department managers/supervisors share the responsibility to ensure that the skill evaluations have been completed for the employees with gas covered task responsibilities in their areas and that the evaluations have been properly documented. The department managers/supervisors are also responsible for developing any skill deficiencies found during the gas operator qualification evaluation(s).

1.1.8 Audit Schedule and Responsibility

The SGOQPC audits the plan annually, or more often if needed, to ensure that the plan includes the latest changes made to covered tasks or other plan elements as described in Paragraph 1.7.1, and to verify all distributed copies of the plan (see Part I, Paragraph 1.1.6 for distribution) are up-to-date. Corrective actions will be initiated to address any deficiencies found.

The annual audit shall be documented. The SGOQPC must notify the Manager, Water/Gas/ Wastewater Operations when the annual review is completed. The report shall include audit findings and an action plan to correct any deficiencies.

1.1.9 Mutual Assistance Agreements and Memorandums of Understanding

Local understandings that may impact gas operator qualification requirements of this plan are located in Section IV, Page 1, of the City's *Gas Emergency Operating Plan*.

1.1.9.1 External Utilities

The City has established mutual assistance understandings with independent contractors. These understandings are maintained by the Coordinator, Utility Projects and implemented through the Director of Utilities (Section I, Page 8, of the City's *Gas Emergency Operating Plan*).

If mutual assistance is needed for the performance of a covered task, each UO division supervisor must ensure that outside personnel meet City of Palo Alto Utilities Operator Qualification requirement to perform the identified covered task(s) or are directly supervised by a qualified individual.

1.1.10 Plan Appendices (Part III)

- A – Covered Task Addition Review
 - B – Covered Task Change Review
 - C – Municipal OQ Tasks and Subtasks List (Specific to CPA)
 - D – List of Subsequent Qualification Intervals / OQ Trainers & Responsibilities
 - E – List of OQ Plan Holders/Coordinator(s)
 - F – Tailgate Meeting Sheet
 - G – OQ Plan Audit Record
 - H – OQ Plan Recordkeeping Audit
-

1.1.11 Annual Review and Responsibility

The SGOQPC/ immediate supervision will at a minimum annually review the list of covered tasks and subtasks with covered and non-covered employees. The annual review shall be documented on an original signed roster and submitted for inputting in *Operations Database*.

The annual review may occur in conjunction with; tailboards, gas emergency training and other forms of group communication.

1.2 Evaluation and Qualification Process

1.2.1 Qualification Evaluation

Skill levels for employees involved in performing covered tasks on pipeline facilities must be assessed per the operator qualification performance evaluation outlined in Part II of this plan.

The Operator Qualification Plan shall include the location and custodian of individual skill and development evaluations in Part V of the plan's reference documents.

1.2.2 Operator Qualification Frequency

All employees whose jobs require that they perform covered tasks on pipelines must be qualified as outlined in Part II of this plan.

1.2.3 Evaluation of Qualifications

An individual's qualification to perform a covered task will be evaluated using one or more of the evaluation methods identified in this plan.

1.2.4 Evaluator Criteria

Using the Operator Qualification Observation Job Performance documents, the evaluator must be able to assess the knowledge and skill level of the participant who will be performing covered tasks on gas pipeline facilities. Only designated personnel from the Utilities Department will evaluate personnel under this plan. The designated personnel could be a supervisor, a current employee working for the gas operations, a gas engineer, or a consultant – see Appendix D for the current list of evaluators.

Note

The Operator Qualification Rule does not require that the evaluator be qualified to perform the covered task. He or she, through knowledge or experience, must only be able to:

- ascertain participant's ability to perform a covered task, and
 - substantiate an individual's ability to recognize and react appropriately to abnormal operating conditions that might occur while performing the task.
-

1.2.5 Evaluation Methods

A number of different evaluation methods are used to determine an individual's ability to perform a covered task. Evaluation methods and qualification criteria applied to a covered task will vary from task to task and classification to classification. The evaluation method chosen for any specific covered task will include one or more of the following:

1. written examination
2. oral examination
3. observation during:
 - (a) performance on the job
 - (b) on-the-job training
 - (c) simulation

Note: Method 3 (a), Observation of on-the-job performance may not be used as the sole method of evaluation.

1.2.6 Evaluation Interval Criteria

The criteria below are applied to each covered task and classification to determine the appropriate evaluation frequency for that task.

1. repetitive nature
2. level of risk
3. complexity
4. existence of checks and balances, such as:
 - (a) checklists; written plans
 - (b) follow-up actions
 - (c) audits
 - (d) job aids
5. regulatory requirements
6. *Operation, Inspection and Maintenance Plan*
7. written materials
8. work performance history
9. Observation during:
 - (a) performance on the job
 - (b) on-the-job training
 - (c) simulation

1.2.6.1 Established Intervals

Re-qualification intervals for covered tasks will vary, but shall not exceed five (5) years. A list of subsequent qualification intervals is available in Part IV, Appendix D.

1.3 Qualification Categories

1.3.1 Initial Qualification

The qualification of all new employees will be considered as initial qualification.

1.3.1.1 Method of Qualification Evaluation

A combination of performance-based qualification evaluation and other methods (e.g., written examination) is used for the initial qualification. The SGOQPC will provide the appropriate testing document for qualifications under this requirement.

1.3.1.2 Failure to Qualify

Should an employee not qualify under the initial qualification requirements above, he or she may not take the same test within 48hrs and will be given an opportunity to obtain the appropriate knowledge and skill through:

- formal training
- structured on-the-job training (OJT)
- OJT mentoring by a qualified person

Upon successful completion of one or more of the knowledge/skill building tools listed above, the individual will re-qualify using performance-based qualification methods. Until the individual has successfully qualified, he or she may perform covered tasks only under the conditions specified in Paragraph 1.4.1.

1.3.2 Subsequent Qualification

The subsequent evaluation of an individual's qualification to perform one or more covered tasks (after an initial qualification to perform the same covered tasks) is done at intervals not to exceed 5 years. The subsequent qualification process may utilize different evaluation criteria than were used for initial qualification.

1.3.2.1 Subsequent Qualification Intervals

The re-qualification schedule will be developed by the SGOQPC and submitted to the Manager, WGW Operations for notification. The schedule will be designed to stagger, or cycle, the evaluations to avoid an unreasonable number of re-qualifications in any one year.

1.3.2.2 Method of Qualification Evaluation

The City will use performance-based evaluation in addition to other evaluation methods (e.g., written examination) when doing subsequent qualifications. See Part II for the performance-based qualification documents.

Continued on next page

1.3.2.3 Failure to Qualify

Should an employee not qualify under the subsequent qualification requirements above, he or she may not take the same test within 48hrs and will be given an opportunity to obtain the appropriate knowledge and skill through:

- formal training
- structured On-the-Job Training (OJT)
- OJT mentoring by a qualified person

Upon successful completion of one or more of the knowledge/skill building tools listed above, the individual will re-qualify using performance-based qualification methods. Until the individual has successfully qualified, he or she may perform covered tasks only under the conditions specified in Paragraph 1.4.1.

1.4 Non-Qualified Individuals

1.4.1 When Non-Qualified Individuals May Perform a Covered Task

The City permits non-qualified individuals to perform covered tasks under certain circumstances, including but not limited to, the non-qualified individual's participation in on-the-job training or when working as part of a crew. *However, under any circumstances, the following conditions must be met:*

- A non-qualified individual shall only perform covered tasks under the direction and observation of a qualified individual.
 - A qualified individual must directly observe non-qualified individuals and be able to take immediate corrective actions when necessary.
 - Span of control should not exceed more than four non-qualified individuals to one qualified individual.
-

1.5 Contributing to an Incident

1.5.1 Performance Contributing to an Incident

If there is reason to believe that an individual's performance of a covered task contributed to an incident, as defined under 49 CFR Part 191 (as amended) and the *Operation, Inspection and Maintenance Manual* and the *Gas Emergency Operating Plan*, the appropriate supervisor will initiate an investigation of that individual's qualification to perform that covered task. The individual should be re-qualified if he or she wants to perform the same covered task.

The following are resources to assist with conducting an investigation and performing root cause analysis:

- Natural Gas Pipeline Anti-Drug and Anti-Alcohol Program
http://theloop.cityofpaloalto.org/mgr/documents/2-19_003.pdf
- Safety Manual (Injury and Illness Prevention Program) Section 5 - Supervisor's Responsibility

Forms to assist:

- *Report of Accident/Property Damage*
<http://theloop.cityofpaloalto.org/hr/Risk-Management/Forms/accprop.pdf>
- Report of Injury/Exposure
- <http://theloop.cityofpaloalto.org/hr/Risk-Management/Forms/supervisorsreportinjuryexposure.doc>

1.5.2 Determining if an Individual Needs to be Evaluated

In accordance with City policy and procedures, an investigation will be initiated for any incident defined by this plan. If in the course of that investigation the City concludes that there is reason to believe that the individual's performance of the covered task contributed to the incident, that individual's qualification to perform that covered task will be evaluated. The evaluator(s) will evaluate the individual in accordance with this gas operator qualification plan.

1.6 Verification of Qualified Individuals

1.6.1 Reasonable Cause to Verify Qualification

Immediate supervision will evaluate an individual if there is reason to believe that he or she is no longer qualified to perform a covered task. Concerns regarding an individual's ability to perform a covered task may be prompted by a number of circumstances and reported to the SGOQPC and appropriate divisions by any person.

1.6.2 Reasons to Verify an Individual's Re-Qualification(s)

Include but are not limited to:

- loss of motor skills, vision, impairment, etc.
 - physical impairment that prevents the individual from performing covered tasks with reasonable accommodation as required by the Americans With Disabilities Act
 - statement from the employee
 - prolonged period of non-performance of the covered tasks (12 months)
 - unsatisfactory performance
 - complaints received
 - fitness for duty
 - contributing to an incident
-

1.6.3 Determining if an Individual Needs to be Evaluated

Department supervisors will initiate an investigation of an individual's qualification to perform a covered task with assistance from the SGOQPC and the appropriate division as needed. The purpose of initiating an investigation is to determine if reasonable cause exists to evaluate an individual's qualification to perform the covered task(s) in question.

If the investigation findings show there is reason to believe an individual is no longer qualified to perform a covered task, that individual's performance of that covered task will be evaluated. The investigation findings shall be documented and distributed to immediate supervision, SGOQPC and the appropriate division for further action.

1.6.4 Removal of Qualification

The Operations database will be up-dated to show that an individual is no longer qualified to perform covered tasks for the following causes:

- employee is no longer qualified
- individual is no longer assigned to perform the covered task (promotion, temporary assignment, leave of absence, etc.)
- removal for other reasons

1.6.5 Reinstatement of Qualification

The qualification of an individual may be reinstated under the following conditions:

1. when an employee returns to a classification requiring him or her to perform a covered task, and
 2. the individual's ability to perform the covered task has been evaluated consistent with the evaluation process outlined in this plan.
-

1.7 Covered Task Changes

1.7.1 Covered Task Change Process

Any changes to a cover task that may occur due to regulatory requirements or operational needs will be reviewed by the Committee Members in the table below. New or modifications to existing company O&M procedures or work practices will be reviewed for possible changes to covered tasks. Forms for documenting this review are available in Part III Appendices A and B. The changes will be incorporated into the OQ Plan during the annual audit as described in Paragraph 1.1.9.

Committee Members
Assistant Director of Utilities Operations
System Gas Operator Qualification Plan Coordinator (SGOQPC)
Manager, Utilities Operations WGW
Manager, Utilities Engineering WGW
Gas Operations Supervisor, WGW
Coordinator, Utility Projects - WGW

1.7.2 Communicate Changes

The WGW Utilities Operations Manager will be responsible for communicating any changes to a covered task to the SGOQPC.

The SGOQPC will communicate such changes to WGW Gas Operations Supervisor who will communicate to the individuals who perform that covered task.

A change may be significant enough to require changes to the qualification process or additional evaluations. These changes may include but are not limited to:

- modifications to the City's policies or procedures
- changes in state or federal regulations
- use of new equipment and/or technology
- new information from equipment or product manufacturer

1.7.3 Communication Process

Any significant changes affecting a covered task will be communicated to the individual(s) performing that task as soon as reasonably possible.

1.7.3.1 Employee Responsibilities

All employees are also responsible for communicating to local supervision any significant changes that affect covered tasks they are assigned to perform.

1.8 Record Keeping

1.8.1 Record Keeping Responsibilities

The SGOQPC will ensure records demonstrating an individual's qualification to perform a covered task will be maintained at the Municipal Service Center using the following methods:

- electronic qualification results
 - hard copy of qualification results
 - other appropriate methods (optional)
-

1.8.2 Record Keeping Requirements

Qualification records will contain:

- covered task
 - method(s) of evaluation
 - date qualification completed
 - name and employee number of individual being qualified
 - division
 - qualification type (transitional, initial, or subsequent)
 - qualification period
 - tasks and sub-tasks objective
 - evaluator name and signature
 - employee signature
-

1.8.3 Record Retention

Records of an individual's current qualifications must be maintained while the individual is performing covered tasks for which he or she is qualified. After an individual is evaluated for subsequent qualification, the prior qualification record must be retained for a minimum of five years.

When an individual is no longer performing covered tasks, the qualification record must be retained for a minimum of five years or when the individual is no longer employed by the city.

1.8.4 Record Audits

Record audits will be performed by the Manager, WGW Operations annually to ensure that records are kept in accordance with this plan.

1.9 Contractors

1.9.1 General Terms Condition Language

In compliance with the Department of Transportation Operation Qualification Guidelines listed in 49 CFR 192 and 195 and City of Palo Alto Utilities Gas Operation Qualification Plan, contractors who perform covered task work must be qualified to perform such work . Furthermore, contractors must be able to recognize and react appropriately to abnormal operating conditions that may indicate a dangerous situation or a condition exceeding design limits.

City of Palo Alto Utilities has identified covered tasks/subtasks that are performed on its pipeline facilities.

1.9.2 Specific Condition Language

City of Palo Alto Utilities will at its option, require contractors to provide copies of the below listed documents to verify compliance with both the DOT Operator Qualification Rule and City of Palo Alto Utilities Gas Operator Qualification Plan.

- Contractor's Qualification Plan
- A certification of compliance with DOT Operator Qualification Guidelines (dated and signed)
- Certificates of performance based testing

City of Palo Alto Utilities may also require all or any of the following:

- Require contractor personnel to qualify under City's plan
 - Require only lead personnel be qualified, or
 - The entire crew be qualified, and
 - Copy of qualification documents (Written and/or Performance Based)
-

1.9.3 Record Keeping

Contractors must maintain records while the individual is performing covered tasks and for a minimum period of 5 years after the individual is no longer performing covered tasks as defined in Section 1.8, Record Keeping, of City of Palo Alto Utilities Gas Operator Qualification Plan. The City shall verify the contractors qualification records and maintain a copy of these records for 5 years.

1.9.4 Qualification Period

All contractor qualifications will expire upon completion of the project or as determined in writing by City of Palo Alto Utilities.

1.9.5 Covered Tasks

City of Palo Alto Utilities will include in each job bid package, a list of identified covered tasks and subtasks.

1.9.6 Contractor Verification

WGW / Engineering and Operations will be responsible for contractor verification when contractors are used to perform covered tasks. The covered task verification process will be done in partnership with WGW Operations.

1.9.7 Local Field Inspections

WGW / Engineering Field Inspectors will be responsible for field compliance with the Operator Qualification Rule. WGW / Engineering Field Inspectors will be responsible for maintaining the individual qualification on the job site while the job is in progress.

1.9.8 Record Retention

The Contract Administrator will include Operator Qualification documents with the completed job package.

1.9.9 Contract Administrator

The contract administrator will be responsible for inserting Operator Qualification requirements into all gas maintenance, operating and construction contracts whereby covered tasks are to be performed.

PART II

QUALIFICATION OVERVIEW

2.1 OQ Training

2.1.1 Purpose

While qualification is accomplished through evaluation, not training, some individuals will require training to provide them with the knowledge, skills and abilities necessary to pass the evaluations for a covered task. Some examples of individuals requiring training are:

- New hires
- Individuals taking on new tasks (transferred or promoted)

Along with initial training, refresher training for individuals who require post incident or for cause re-evaluation will also be available.

2.1.2 Training Matrix

Training matrix will be provided on this page.

2.2 Performance-Based Qualification

2.2.1 Purpose

The purpose of the City of Palo Alto Utilities Gas Operator Qualification Plan is to ensure that only qualified employees perform covered tasks on gas pipeline facilities.

Part V of this plan contains performance-based evaluation documents. The evaluator uses the documents when assessing the skill and knowledge levels of potential and incumbent individuals who will perform covered tasks on gas pipeline facilities without the supervision of a person qualified to perform the covered tasks. These individuals must at a minimum meet the requirements of the job description as outlined by the city's HR department.

Job descriptions are available on the city's website.

2.2.2 Initial Qualification–Job Performance Evaluations

Initial Qualification is the qualification, completed at any time, for all new employees who are required to perform a covered task on a gas pipeline.

2.2.3 Subsequent Qualification–Job Performance Evaluations

Subsequent Qualification is the qualification completed after the initial qualification. Subsequent qualification is done at an interval defined in Part I, Paragraph 1.2.6.1.

This process requires the evaluator to follow evaluation methods as specified in 1.2.5 before a person performs a covered task.

2.2.4 Intervals

Employees will be required to re-qualify for covered tasks as scheduled, but not to exceed five (5) years. A list of subsequent qualification intervals is available in Part IV, Appendix D.

2.2.5 Evaluation Methods

The following table represents acceptable methods of evaluating individuals performing covered tasks.

Evaluation Method	Initial Qualification	Subsequent Qualification
Written exam	YES	YES
Oral exam	YES	YES
Work performance history review	May not be used as the sole evaluation method.	May not be used as the sole evaluation method.
Observation:		
• on-the-job performance	May not be used as the sole evaluation method.	May not be used as the sole evaluation method.
• on-the-job training	YES	YES
• simulation	YES	YES

2.3 Roles and Responsibilities

2.3.1 System Gas Operator Qualification Plan Coordinator

The WGW Operations Manager appoints a City SGOQPC who is responsible for:

- maintaining the City of Palo Alto Utilities Gas Operator Qualification Plan and its policies
 - reviewing the plan periodically and updating it as needed
 - adding individuals to the plan
 - removing individuals from the plan
 - taking appropriate steps when reasons exist to suspect an individual performing a covered task may have contributed to an incident
 - reviewing and maintaining the qualification records.
-

2.3.2 Supervisor, WGW Operations

Department supervisors will be responsible for conducting a qualification evaluation when:

- adding individuals to the plan
 - reasons exist to suspect that an individual performing a covered task may have contributed to an incident
 - reasons exist to indicate that an individual is no longer qualified to perform covered tasks
-

2.3.3 Manager, WGW Operations

The Manager, WGW Operations will be responsible for annual audit of operator qualification records.

2.4 Affected Classifications

2.4.1 Affected Classifications

These are the Classifications affected by the Operator Qualification Rule.

Note

Not everyone in the classification may perform a covered task and would not be affected by the OQ Rule.

Cathodic Technician	Equipment Operator
Chief Inspector, WGW	Field Service Rep, Lead
Inspector, Field Services	Field Service Rep
Damage Prevention Spec./Locator	Gas System Technician
Electrician (SCADA)	Installer/Repairer, Lead
Meter Reader, Lead	Installer/Repairer
Meter Reader	Installer/Repairer Assistant
Maintenance Mechanic	WGW Supervisors
Maintenance Mechanic, Sr	

In addition to the classification list in the above table, the Supervisors Water/Gas/Wastewater may be qualified to perform a covered task to assist during gas emergencies.

PART III

HISTORY

Covered Tasks Identification Process



Introduction:

The tasks were developed by the IUWG (Inter-Utility Working Group) consortium, which consisted of California utilities and municipalities working together to reach consensus on tasks. Also, Southwest Gas of the State of Nevada assisted as well. Once the tasks were identified, the evaluation and qualification of individuals performing covered tasks needed to be completed by October 28, 2002.

The IUWG Committee refers to the tasks in this document as potential covered tasks, because each operator is responsible for identifying the covered tasks in its own respective system. As such, the tasks identified herein must be reviewed by each IUWG Member and modified as necessary to be consistent with the tasks performed, the components that make up each separate gas system, the degree of specialization of each work force, and the manner in which work is assigned.

IUWG Committee Members:

Below are the IUWG Committee Members who assisted in developing a consensus covered task list as identified in the Part IV. The Committee met over several dates to reach consensus and come to an understanding that each member may later modify the attached covered task list.

San Diego Gas and Electric Company	Pacific Gas and Electric Company	City of Palo Alto
City of Long Beach	SoCal Gas	Southwest Gas
Sacramento Municipal Utility District	Avista	

The Committee relied on the guidance in the Preamble to the Rule in applying the four-part test to the tasks as follows:

- 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

Task Breadth:

Another challenge for the Committee was the breadth of a task. That is, should tasks be identified at a narrow level or at a broader level? The Committee took the position that tasks should be identified at a broad level so that each utility/municipality can structure its component subtasks to its operations and maintenance procedures, which may vary depending on operational procedures, work crew assignments and gas system structure. Thus, the Committee used the broader approach in determining tasks, for instance, leak survey functions:

Covered Task Number (09-00.00):

- Leak Survey/Investigation

Sub-tasks:

- Conduct Survey
- Leak Investigation

Learning Task Definition:

Another challenge for the Committee was agreeing on a learning definition of a task. The Committee reached consensus on the learning definition expressed below.

- ¹A task is defined as, “a series of actions leading to a meaningful outcome.”
- A subtask is defined as, “a series of steps (activities) that by themselves does not lead to a meaningful outcome.”

The Committee also realized that a task in one O&M function might in fact be a sub-task in another O&M function. For instance, some Members require that when Inspecting and Testing Pressure Regulating and Limiting Devices (task #14-00.00), the mechanic is required to perform valve maintenance on valves within the regulation station. Thus, valve maintenance (task #17-00.00), in this instance is a subtask to task #14-00.00.

In summary, each Member Agency is free to adjust the attached list of tasks according to its own operations and maintenance requirements.

¹ Robert Mager - Center for Effective Performance

Covered Subtasks Identification Process



Introduction:

In early 2001, a Committee was selected consisting of individuals from WGW Operations, WGW Engineering, and Utility Administration/Customer Service for the purpose of determining subtasks for tasks identified by the IUWG Committee. This Committee was also responsible for identifying the enablers for the subtasks that were identified.

The Committee used an exhaustive process at several meetings to produce, edit and create the final list of task/subtask enablers. The experience of frontline supervisors, trainers, managers, and specialists was extremely critical in reaching consensus as a Committee.

The following components were necessary in determining enablers for the critical analysis: work assignments, City Policies and Procedures, job definition and DOT references.

Committee Members:

Below are the initial Committee Members who assisted in determining through consensus the tasks and subtasks enablers.

Position/Department
Assistant Director, WGW Operations
Manager, WGW Operations
Utility Project Coordinator, WGW Operations
Supervisor, WGW Operations
Utilities Field Inspector, WGW Operations
Manager, Engineering
Sr. Gas Engineer, Engineering

PART IV
PLAN APPENDICES



COVERED TASK ADDITION REVIEW

New O&M Procedure: This form is used as a tool by the Utilities Department to communicate new O&M Procedures so that the review can be made by the SGOQPC (System Gas Operator Qualification Plan Coordinator) to determine if the new procedure will meet the criteria of covered work procedures. The SGOQPC in coordination with line organizations will review the proposed changes and determine their impact.

Summary of new O&M Procedure:

Contact/Writer Signature: _____ Date: _____

SGOQPC Review:

Does the work procedure required to implement the new O&M Procedure meet the criteria for a covered task? (An activity must meet all four of the requirements to qualify as a covered task).

- Is the activity performed on a pipeline facility?
Is it an operations or maintenance task?
Is it performed as a requirement of CFR 192?
Does it affect the operation or integrity of the pipeline?

SGOQPC Review:

Impact Yes/No: If yes, indicate action required:

Task Title: Task Number:

- Rewrite of Task/Subtask
Revise Utilities Gas Operator Qualification Plan
Revise Municipal OQ Tasks and Subtasks List
Revise List of Subsequent Qualification Intervals / OQ Trainers & Responsibilities
Revise DOT Gas OQ Summary (Specific to CPA)
Revise Subtask Cover Sheet
Revise Written Examination
Revise Field Examination
Formal Retraining
Requalification
Revise Local Tailboard
Update Operations Database



OPERATION QUALIFICATION

COVERED TASK ADDITION REVIEW (Cont.)

Affected Classifications:

Job Classification	Job Classification Code	Job Classification	Job Classification Code

Process Start Date: _____ Process Completion Date: _____

SGOQPC Signature: _____ Date: _____



OPERATION QUALIFICATION

COVERED TASK CHANGE REVIEW

Revised O&M Procedure: This form is used as a tool by the Utilities Department to communicate changes to existing O&M Procedures so that the review can be made by the SGOQPC (System Gas Operator Qualification Plan Coordinator) to determine if the change(s) will require revision and/or requalification of individual performing tasks and/or subtasks covered by the revised Standard. The **SGOQPC** in coordination with line organizations will review the proposed changes and determine their impact.

Summary of revision:

Contact/Writer Signature: _____ Date: _____

SGOQPC Review:

Impact Yes/No: _____ If yes, indicate action required: _____

Task Title: _____ Task Number: _____

- | | |
|---|---|
| <input type="checkbox"/> Rewrite of Task/Subtask | <input type="checkbox"/> Revise Subtask Cover Sheet |
| <input type="checkbox"/> Revise Utilities Gas Operator Qualification Plan | <input type="checkbox"/> Revise Written Examination |
| <input type="checkbox"/> Revise Municipal OQ Tasks and Subtasks List | <input type="checkbox"/> Revise Field Examination |
| <input type="checkbox"/> Revise List of Subsequent Qualification Intervals/
OQ Trainers & Responsibilities | <input type="checkbox"/> Formal Retraining |
| <input type="checkbox"/> Revise DOT Gas OQ Summary
(Specific to CPA) | <input type="checkbox"/> Requalification |
| | <input type="checkbox"/> Local Tailboard |
| | <input type="checkbox"/> Update Operations Database |

Affected Classifications:

Job Classification	Job Classification Code	Job Classification	Job Classification Code

Process Start Date: _____ Process Completion Date: _____

SGOQPC Signature: _____ Date: _____



CITY OF PALO ALTO
UTILITIES

Municipal Operator Qualification Task and Subtask List
Specific to City of Palo Alto Operations

CPAOQ

Input Task Code	Task	Input Subtask Code	Subtask	DOT Reference	Operations & Maintenance Manual Ref.
01-00.00	Pipe Fusion	01-01.00	Pipe Fusion	192.281-285	Maintenance (Pg. 60); A16; A17; A18; A19; A22
02-00.00	Soap Test	02-01.00	Soap Test	192.503 & 725	Design/Constr. (Pg. 15 & 19); Maintenance (Pg. 61 & 62); A20; A21
03-00.00	Pipe Squeezing	03-01.00	Pipe Squeezing – Plastic (1/2" and 1")	192.605	Normal Operations (Pg. 22); Maintenance (Pg. 39); A-22; A-50
		03-02.00	Pipe Squeezing - Plastic (2" & 4")	192.605	Normal Operations (Pg. 22); Maintenance (Pg. 39); A-22; A-50
04-00.00	Repair/Replace Distribution Pipeline	04-01.00	Mechanical Repairs (all repairs which are not fusion or welding)	192.605	Design/Constr. (Pg. 15); Maintenance (Pg. 40); A-23
		04-02.00	Pipeline Replacement	192.605	Maintenance (Pg. 39); A16; A17; A18; A19; A20; A21; A22; A23; A36; A50; A58

Revised: December, 2010



CITY OF PALO ALTO
UTILITIES

Municipal Operator Qualification Task and Subtask List

Specific to City of Palo Alto Operations

CPAOQ

Input Task Code	Task	Input Subtask Code	Subtask	DOT Reference	Operations & Maintenance Manual Ref.
05-00.00	Tapping Pipelines Under Pressure	05-01.00	Operate Service Tee Tapping / Plugging Equipment (1/2" to 2")	192.627	Maintenance (Pg. 29)
		05-02.00	Operate Top Tapping / Plugging Equipment (2" to 8")	192.627	Maintenance (Pg. 29)
06-00.00	Abandon / Deactivate	06-01.00	Abandonment or Deactivation Pipeline Facilities	192.727	Maintenance (Pg. 62 & 69); A34; A35
07-00.00	Continuing Surveillance	07-01.00	Inspect and Maintain Distribution Line	192.721	Maintenance (Pg. 31 & 72); A36; A39
		07-02.00	Line Markers	192.707	Maintenance (Pg. 37); A36; A39
		07-03.00	Conduct Survey	192.723	Maintenance (Pg. 32); A36; A39
08-00.00	Leak Response	08-01.00	Leak Investigation	192.723	Maintenance (Pg. 32); A36; A39
09-00.00	Gas Meter Set	09-01.00	Meter Sets	192.353-359	Design/Constr. (Pg. 17); Gas Utility Standards
		09-02.00	Change Riser Valve	192.353	Design/Constr. (Pg. 17)



CITY OF PALO ALTO
UTILITIES

Municipal Operator Qualification Task and Subtask List Specific to City of Palo Alto Operations

CPAOQ

Input Task Code	Task	Input Subtask Code	Subtask	DOT Reference	Operations & Maintenance Manual Ref.
10-00.00	Locate Facilities	10-01.00	Mark and Locate Facilities	192.614 (a) / (5)	Normal Ops. (Pg. 26); A26; A27; A36; A42; A44; A53
		10-02.00	Pipeline Standby	192.614	Normal Ops. (Pg. 26); A26; A27; A36; A42; A44; A53
11-00.00	Corrosion Control	11-01.00	Distribution Pipe Coating – Tape/Paint	192.451-491	Maintenance (Pg. 39)
		11-02.00	Atmospheric Corrosion	192.451-491	Corrosion Control (Pg. 88 & 90)
		11-03.00	Pipe Inspection	192.451-491	Corrosion Control (Pg. 80, 88 & 90)
12-00.00	Purging of Pipelines	12-01.00	Air Purging	192.629 (a)	Normal Ops. (Pg. 22); A34; A35; A50
		12-02.00	Gas Purging	192.629 (b)	Normal Ops. (Pg. 22); A34; A35; A50
13-00.00	Pressure Regulation / Control	13-01.00	Maintain / Operate Regulators (includes valves operating as regulators regardless of service)	192.739	Design/Constr. (Pg. 64)
		13-02.00	Test / Maintain Relief Devices	192.739/ 743	Maintenance (Pg. 64)
		13-03.00	Inspect Vault	192.749 (a)	Maintenance (Pg. 78)



CITY OF PALO ALTO
UTILITIES

Municipal Operator Qualification Task and Subtask List

Specific to City of Palo Alto Operations

CPAOQ

Input Task Code	Task	Input Subtask Code	Subtask	DOT Reference	Operations & Maintenance Manual Ref.
14-00.00	Monitor System Conditions (SCADA)	14-01.00	Monitor SCADA System	192.741	Maintenance (Pg. 64)
		14-02.00	Inspect/Maintain SCADA RTUs	192.747	FUTURE
15-00.00	Valve Maintenance	15-01.00	Inspect / Maintain Emergency Valves	192.747	Maintenance (Pg. 67)
		15-02.00	Remote Valve Operation		FUTURE
16-00.00	CP System Monitoring	16-01.00	Rectifier Reads	192.451-491	Corrosion Control (Pg. 82)
		16-02.00	Pipe-to-Soil Reads	192.451-491	Corrosion Control (Pg. 82)
		16-03.00	Cathodic Protection Maintenance	192.451-491	Corrosion Control (Pg. 82); A-30; A-31; A43
		16-04.00	Galvanic Anode Maintenance	192.451-491	Corrosion Control (Pg. 82)
		16-05.00	Internal Corrosion / Monitor	192.451-491	Corrosion Control (Pg. 87)
17-00.00	Welding of Pipelines	17-01.00	Weld Repair	192.225	Maintenance (Pg. 40 & 46); A30; A31; A-33; A43

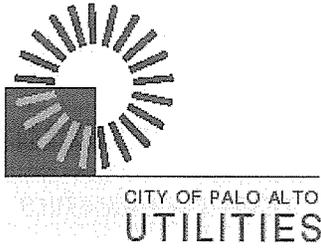
All numbered references in the last column are to the City of Palo Alto's Gas Operations & Maintenance Manual. The numbers preceded by an "A" refer to pages in the appendix.

Revised: December, 2010

Tasks	Description	In House	Contract	Admin&Trainer	Method	Year	Freq
01-01.00	Pipe Fusion	1	0	In house trainer/consultant	C/S/F	2010	*
02-01.00	Soap Test	1	0	In house trainer/consultant	F	2010	5 Yrs
03-01.00	Pipe Squeezing - Plastic (1/2" and 1")	1	0	In house trainer/consultant	C/S/F	2010	5 Yrs
03-02.00	Pipe Squeezing - Plastic (2" and 4")	1	0	In house trainer/consultant	C/S/F	2010	5 Yrs
04-01.00	Mechanical Repairs	1	0	In house trainer/consultant	S/F	2010	5 Yrs
04-02.00	Pipeline Replacement	1	0	In house trainer/consultant	C/S/F	2010	5 Yrs
05-01.00	Tap & Plug Svc Tee 1/2" - 2"	1	0	In house trainer/consultant	C/S/F	2010	5 Yrs
05-02.00	Tap & Plug Svc Tee 2" - 8"	1	0	In house trainer/consultant	C/S/F	2010	5 Yrs
06-01.00	Abandonment or Deactivation Pipeline	1	0	In house trainer/consultant	C/S/F	2010	5 Yrs
07-01.00	Inspect and Maintain Distribution Line	1	0	In house trainer/consultant	C/S/F	2010	5 Yrs
07-02.00	Line Markers	1	0	In house trainer/consultant	C/S/F	2010	5 Yrs
07-03.00	Conduct Survey	1	1	In house trainer/consultant	F	2010	5 Yrs
08-01.00	Leak Investigation	1	0	In house trainer/consultant	C/F	2010	5 Yrs
09-01.00	Meter Sets	1	0	In house trainer/consultant	C/S/F	2010	5 Yrs
09-02.00	Change Riser Valve	1	0	In house trainer/consultant	C/S/F	2010	5 Yrs
10-01.00	Mark and Locate Facilities	1	0	In house trainer/consultant	C/F	2010	5 Yrs
10-02.00	Pipeline Standby	1	0	In house trainer/consultant	C/F	2010	5 Yrs
11-01.00	Distribution Pipe Coating - Tape / Paint	1	0	In house trainer/consultant	C/S/F	2010	5 Yrs
11-02.00	Atmospheric Corrosion	1	0	In house trainer/consultant	C/S/F	2010	5 Yrs
11-03.00	Pipe Inspection	1	0	In house trainer/consultant	C/S/F	2010	5 Yrs
12-01.00	Air Purging	1	0	In house trainer/consultant	C/S/F	2010	5 Yrs
12-02.00	Gas Purging	1	0	In house trainer/consultant	C/S/F	2010	5 Yrs
13-01.00	Maintain / Operate Regulators	1	0	In house trainer/consultant	C/F	2010	5 Yrs
13-02.00	Test / Maintain Relief Devices	1	0	In house trainer/consultant	C/F	2010	5 Yrs
13-03.00	Inspect Vault	1	0	In house trainer/consultant	C/F	2010	5 Yrs
14-01.00	Monitor (SCADA) System	1	0	In house trainer/consultant	C/F	2010	5 Yrs
14-02.00	Inspect / Maintain (SCADA) RTUs	1	0	In house trainer/consultant	C/F	2010	5 Yrs
15-01.00	Inspect / Maintain Emergency Valves	1	0	In house trainer/consultant	C/F	2010	5 Yrs
15-02.00	Remote Valve Operation	1	0	In house trainer/consultant	C/F	2010	5 Yrs
16-01.00	Recifier Reads	1	0	In house trainer/consultant	C/S/F	2010	5 Yrs
16-02.00	Pipe Inspection	1	0	In house trainer/consultant	C/S/F	2010	5 Yrs
16-03.00	Pipe-to-Soil Reads	1	0	In house trainer/consultant	C/S/F	2010	5 Yrs
16-04.00	Cathodic Protection Maintenance	1	0	In house trainer/consultant	C/S/F	2010	5 Yrs
16-05.00	Galvanic Anode Maintenance	1	0	In house trainer/consultant	C/S/F	2010	5 Yrs
16-06.00	Internal Corrosion / Monitor	1	0	In house trainer/consultant	C/S/F	2010	5 Yrs
17-01.00	Weld Repair	1	1	In house trainer/consultant	S/F	2010	**

Initials	Names	Initials	Names	Initial	Methods
AE	Alicia Easton	JMS	Jorge M Silva	C	Class
AM	Anthony Meneses	MS	Martin Simon	F	Field
BS	Brian Saulus	PM	Pete Manansala	S	Simulation
CS	Chris Sigur	RS	Rui Silva	*	Subsequent Training Frequency = once every 5 years and must make one fusion every 12 months.
FA	Frank Alvarado	SG	Steve Giovanetti	**	Requalify once per year and must make one weld every six months with the process he/she his qualified for.
JS	Jasen Strickland	TH	Thomas Hafner	5 Yrs	Subsequent Training Frequency = once every 5 years
JH	Jordan Hart	WV	Vinnie Vasquez		
BH	Bryan Hagins				

1-Mar-11



Tailboard Form

WGW: Maintenance **Supervisor:**

Date: MM/DD/YY

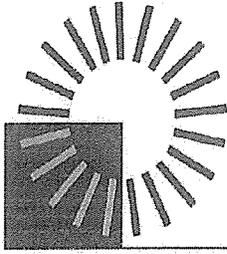
Topic/Issue discussed:

Name	Initials	Name	Initials

Handouts/videos/material used:

Follow-up items:

PART V
REFERENCE DOCUMENTS



CITY OF PALO ALTO
WGW OPERATIONS

Memorandum

Date: February 22, 2011
To: Rui Silva, Coordinator Utilities Projects
From:  Javad Ghaffari, WGW Operations Manager
Subject: Gas System Operator Qualification Plan Coordinator

As part of my responsibility to ensure that the City of Palo Alto's Operator Qualification Plan adheres to Federal Pipeline Safety Regulation, 49 CFR 192, I have appointed Rui Silva, Coordinator Utilities Projects, to be the City's System Gas Operator Qualification Plan Coordinator (SGOQPC). The SGOQPC's responsibilities include those listed in Part I of the plan under section 1.1.7

The records having to do with qualification under this rule will be maintained in the following locations:

- Electronically, using operations data base.
- Hard copies of results will be field in the WGW Operations office, Municipal Service Center (MSC), located at 3201 east Bay shore Road, Palo Alto, Ca 94301.



City of Palo Alto
Water Gas Wastewater Operations
Operators Qualification

Employee Name: _____ **Employee ID:** _____

Module 01: Fusion

Subtask ID: 01-01 Subtask Name: Pipe Fusion

Qual. Type: **Initial** **Subsequent**

Written	Pass	Date
Written Examination	<input type="checkbox"/>	

Observation	Pass	Date
Performance on the Job	<input type="checkbox"/>	
On-the-job training	<input type="checkbox"/>	
Simulation	<input type="checkbox"/>	

System Gas Operator Qualification Plan Coordinator

SGOQPC Name: _____

SGOQPC Signature: _____ **Date:** ____ / ____ / ____

Reason Revoked: **Accident** **Reasonable Cause**

Notes:



OQ TASKS PERFORMANCE EVALUATION

Initial

Simulation

Field Performance

Retake

Subsequent

Employee Full Name (Print)	Position #
Job Title	Department/Section
	Utilities Operations - WG&W

Module : _____ Subtask: _____ Subtask # _____

Subtask Criteria: The following criteria will be observed by the evaluator during simulation or field performance.

#	Items	Pass	Fail
1	Safety Requirements:	<input type="checkbox"/>	<input type="checkbox"/>
	• Ability to identify and resolve abnormal operating condition(s)		
2	Access, understand and apply Company Standard(s):	<input type="checkbox"/>	<input type="checkbox"/>
	• Gas Standards		
3	Inspect and Prepare Pipeline:	<input type="checkbox"/>	<input type="checkbox"/>
	• Identify pipeline material		
	• Identify pipeline pressure		
	• Clean pipeline		
	• Support pipeline		
4	Pressure Control:	<input type="checkbox"/>	<input type="checkbox"/>
	• Identify pressure control method		
	• Grounding procedures		
	• Stop off pipeline and confirm shut down		
	• Cut and cap off active pipeline		
	• Soap test		
5	Purging Requirements:	<input type="checkbox"/>	<input type="checkbox"/>
	• Verify pipeline have been disconnected from all sources of natural gas		
	• Purge deactivate pipeline of natural gas		
	• Verify combustible mixture is not present after purging		
6	End Seal Abandoned Pipeline:	<input type="checkbox"/>	<input type="checkbox"/>
	• Cut pipeline in sections		
	• Select and install end seal method		

Employee Signature _____

Date _____

Evaluator Name and Title _____

Evaluator Signature _____

Date _____

Exhibit 2

From: Ghaffari, Javad
Sent: Wednesday, April 04, 2012 3:54 PM
To: Scott, Eric
Subject: 2011 OQ Plan to DOT

Attachments: CPAU_OQ_Plan.pdf

From: Ghaffari, Javad
Sent: Wednesday, March 02, 2011 4:37 PM
To: 'Hossein.Monfared@dot.gov'
Subject: OQ Plan

Dear Hossein,

Enclosed please find a draft copy of the Palo Alto's OQ plan. We are in process of retaining a consultant, Andy Bradfield, to review or OQ plan and assist us with the evaluation of our gas program. As I indicated in my previous email, we started a process to excavate and redo the 5 fusions that were outside the 12 months qualification period. As of to date, four locations were inspected, re-fused, tested and backfilled. The last location is scheduled to be done by tomorrow. I will send you pictures of the work that crew have done.

Thank you for your time for reviewing the plan.

Javad



Exhibit 3

From: Ghaffari, Javad
Sent: Wednesday, April 04, 2012 4:27 PM
To: Scott, Eric
Subject: FW: OQ Plan
The OQ Acknowledged by inspector.

From: Ghaffari, Javad
Sent: Thursday, March 03, 2011 7:51 AM
To: Batchelor, Dean
Subject: FW: OQ Plan

From: Hossein.Monfared@dot.gov [mailto:Hossein.Monfared@dot.gov]
Sent: Wednesday, March 02, 2011 5:22 PM
To: Ghaffari, Javad
Subject: RE: OQ Plan

Thanks Javad...

From: Ghaffari, Javad [mailto:Javad.Ghaffari@CityofPaloAlto.org]
Sent: Wednesday, March 02, 2011 4:37 PM
To: Monfared, Hossein (PHMSA)
Subject: OQ Plan

Dear Hossein,

Enclosed please find a draft copy of the Palo Alto's OQ plan. We are in process of retaining a consultant, Andy Bradfield, to review or OQ plan and assist us with the evaluation of our gas program. As I indicated in my previous email, we started a process to excavate and redo the 5 fusions that were outside the 12 months qualification period. As of to date, four locations were inspected, re-fused, tested and backfilled. The last location is scheduled to be done by tomorrow. I will send you pictures of the work that crew have done.

Thank you for your time for reviewing the plan.

Javad



Exhibit 4 - Probable Violation #3-N §192.805(b) Qualification Program

Reference to 49 CFR

§192.285 Plastic pipe: Qualifying persons to make joints.

(c) A person must be requalified under an applicable procedure, if during any 12-month period that person:

- (1) Does not make any joints under that procedure; or
- (2) Has 3 joints or 3 percent of the joints made, whichever is greater, under that procedure that are found unacceptable by testing under §192.513.

Probable Violation #3-N §192.805(b) Qualification Program

For the period May 5th 2009 through January 1st 2011, nine City employees performed 67 fusion joints, as shown in the tables below. Out of the 67 joints, PHMSA identified 41 of them as being done by individuals with expired qualifications. Although 28 fusion joints (in blue) were completed by an individual who had not been tested in the prior 12 month period, each of these six individuals *had* completed a different fusion joint at least once in the prior 12 month period. Thus, these six individuals met the fusion joint qualification requirements in the City's November 2009 OQ Plan, Appendix D and Section 192.285(c).

Five fusion joints (in red) were completed by three individuals who had neither completed a fusion joint nor been tested in the prior 12 month period. Thus, only three of the nine individuals were not properly qualified under the terms of Section 192.285(c) and the OQ Plan then in effect, and only 5 of these joints exceeded the 12 month period.

In the interest of utmost system safety and integrity, the City took the extraordinary action to dig up and completely remove and reinstall the five fusion joints in 2011 at a cost of \$22,577.01. Further, during the normal course of distribution system operations, the City leak surveyed 20 of the 41 locations in 2011 (no leaks found) and all the remaining locations will be leak surveyed in 2012.

Fusion Joint Summary Tables – May 5, 2009 through January 1, 2011

Operator: Anthony Meneses

OQ Dates: 5/7/2009
 OQ Dates: 10/26/2010
 OQ Dates: 1/14/2011
 OQ Dates: 1/10/2012

Between 5/7/2009 and 10/26/2010 Anthony completed 13 fusion joints, never exceeding the 12-month period in between fusion joints, therefore re-qualification was not required.

#	Fusion Joint Number	Fusion Date	#	Fusion Joint Number	Fusion Date
1	50014523	7/21/09	8	50016148	6/1/10
2	50014547	10/6 /2009	9	50016233	6/28/10
3	50015166	10/21/2009	10	40012854	8/31/10
4	50015091	11/3 /2009	11	40012574	9/15/10



Exhibit 4 - Probable Violation #3-N §192.805(b) Qualification Program

5	50015540	1/12/10	12	40010899	9/20/10
6	50015844	4/14/10	13	40012501	10/20/2010
7	50015997	5/24/10			

Operator: Chris Sigur

OQ Dates: 5/7/2009
 OQ Dates: 1/21/2011
 OQ Dates: 12/14/2011

Between 5/7/2009 and 01/21/2011 Chris completed 16 fusion joints, never exceeding the 12-month period in between fusion joints, therefore re-qualification was not required.

#	Fusion Joint Number	Fusion Date	#	Fusion Joint Number	Fusion Date
1	50013551	6 /9 /2009	9	50015105	3 /11/2010
2	50014503	6 /12/2009	10	50015904	4 /1 /2010
3	50014521	8 /17/2009	11	50015986	4 /13/2010
4	50014557	9 /14/2009	12	50015991	5 /3 /2010
5	50014896	9 /23/2009	13	50016223	6 /10/2010
6	50014799	9 /30/2009	14	40008539	7 /14/2010
7	50015152	10/21/2009	15	50016990	11/16/2010
8	50015558	1 /14/2010	16	50017179	11/24/2010



Exhibit 4 - Probable Violation #3-N §192.805(b) Qualification Program

Operator: Doug Bohna

OQ Dates: 5/7/2009
 OQ Dates: 10/26/2010
 OQ Dates: 1/14/2011
 OQ Dates: 1/06/2012

Between 5/7/2009 and 10/26/2010 Doug completed 23 fusion joints, never exceeding the 12-month period in between fusion joints, therefore re-qualification was not required.

#	Fusion Joint Number	Fusion Date	#	Fusion Joint Number	Fusion Date
1	50014556	9 /12/2009	14	40008539	6 /28/2010
2	40009323	9 /15/2009	15	40011590	6 /29/2010
3	40011507	11/16/2009	16	40011049	7 /8 /2010
4	50015634	2 /3 /2010	17	50016325	7 /13/2010
5	40011760	2 /23/2010	18	50016339	8 /10/2010
6	40012253	3 /10/2010	19	50016338	8 /28/2010
7	40010838	3 /17/2010	20	50016659	9 /9 /2010
8	40011597	4 /28/2010	21	50016993	10/20/2010
9	40008703	5 /17/2010	22	50017028	10/25/2010
10	40011049	6 /8 /2010	23	50016621	10/27/2010
11	40011285	6 /15/2010			
12	40012704	6 /16/2010			
13	40012167	6 /21/2010			

Operator: Dan Mendoza

OQ Dates: 5/7/2009
 OQ Dates: 1/25/2011
 OQ Dates: 12/14/2011

Between 5/7/2009 and 1/25/2011 Dan completed 4 fusion joints, with 3 exceeding the 12-month period. All three fusion joints were completely removed and re-installed in 2011.

#	Fusion Joint Number	Fusion Date
1	40011733	6 /14/2009
2	40011031	8 /24/2010
3	40013045	9 /2 /2010
4	40011755	9/23/2010



Exhibit 4 - Probable Violation #3-N §192.805(b) Qualification Program

Operator: Jackey Wilson

OQ Dates: 5/7/2009
OQ Dates: 10/26/2010
OQ Dates: 1/21/2011
OQ Dates: 1/05/2012

Between 5/7/2009 and 10/26/2010 Jackey completed 1 fusion joint which exceeded the 12-month period. This fusion joint was completely removed and re-installed in 2011.

#	Fusion Joint Number	Fusion Date
1	50016149	6 /1 /2010

Operator: Michael Haynes

OQ Dates: 5/7/2009
OQ Dates: 10/26/2010
OQ Dates: 1/14/2011
OQ Dates: 12/14/2011

Between 5/7/2009 and 10/26/2010 Michael completed 2 fusion joints, with 1 exceeding the 12-month period. This fusion joint was completely removed and re-installed in 2011.

#	Fusion Joint Number	Fusion Date
1	50013565	6/4/2009
2	40011463	7/28/2010

Operator: Pedro Perez

OQ Dates: 5/7/2009
OQ Dates: 10/26/2010
OQ Dates: 2/2/2011
OQ Dates: Retired

Between 5/7/2009 and 10/26/2010 Pedro completed 2 fusion joints, never exceeding the 12-month period in between fusion joints, therefore re-qualification was not required.

#	Fusion Joint Number	Fusion Date
1	50014959	9/21/2009
2	50016666	8/31/2010

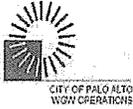


Exhibit 4 - Probable Violation #3-N §192.805(b) Qualification Program

Operator: Rich Andersen

OQ Dates: 5/7/2009
OQ Dates: 10/26/2010
OQ Dates: 1/14/2011
OQ Dates: Transferred

Between 5/7/2009 and 10/26/2010 Rich completed 3 fusion joints, never exceeding the 12-month period in between fusion joints, therefore re-qualification was not required.

#	Fusion Joint Number	Fusion Date
1	40010821	6 /22/2009
2	40011522	12/5 /2009
3	50015916	4 /10/2010

Operator: Robert Justus

OQ Dates: 5/7/2009
OQ Dates: 10/26/2010
OQ Dates: 1/14/2011
OQ Dates: 12/14/2011

Between 5/7/2009 and 10/26/2010 Robert completed 3 fusion joints, never exceeding the 12-month period in between fusion joints, therefore re-qualification was not required.

#	Fusion Joint Number	Fusion Date
1	40011390	10/1 /2009
2	40011744	6 /17/2010
3	40012337	6 /24/2010



Exhibit 4 - Probable Violation #3-N §192.805(b) Qualification Program

FUSION REPLACEMENTS

Fusion 1

Operator: Dan Mendoza

Fusion Joint Number	Address	Street	Completed Date	Replaced Date
40011031	744	Forest Ave	8 /24/2010	3/2/2011

Job Cost: \$3678.02

Fusion 2

Operator: Dan Mendoza

Fusion Joint Number	Address	Street	Completed Date	Replaced Date
40013045	2435	Tasso Ct	9/2/2010	2/28/2011

Job Cost: \$3633.01

Fusion 3

Operator: Dan Mendoza

Fusion Joint Number	Address	Street	Completed Date	Replaced Date
40011755	4249	El Camino Real	9/23/2010	3/2/2011

Job Cost: \$3952.90



Exhibit 4 - Probable Violation #3-N §192.805(b) Qualification Program

Fusion 4

Operator: Jackey Wilson

Fusion Joint Number	Address	Street	Completed Date	Replaced Date
50016149	570	Pena Ct	6/1/2010	3/4/2011

Job Cost: \$7639.93

Fusion 5

Operator: Michael Haynes

Fusion Joint Number	Address	Street	Completed Date	Replaced Date
40011463	49	Wells Ave	7/28/2010	3/1/2011

Job Cost: \$3673.24