

**OFFICE OF PIPELINE SAFETY (OPS)**  
**GAS TRANSMISSION PIPELINE INTEGRITY MANAGEMENT PROGRAM (IMP)**  
**INSTRUCTIONS FOR SEMI-ANNUAL REPORTING OF PERFORMANCE MEASURES**  
**VIA THE OPS ONLINE DATA ENTRY SYSTEM (ODES)**

**August 25, 2004 – Please note these instructions are revised from the last posting of August 17, 2004**

This document provides instructional guidance to operators of gas transmission pipelines who seek to comply with semi-annual reporting requirements of performance measures for integrity management.

**What am I reporting?**

49 CFR 192.907(a) requires that operators of gas transmission pipelines develop integrity management programs by December 17, 2004. The Office of Pipeline Safety recognizes that many operators are not presently prepared to begin reporting on all the required program elements as outlined in the rule. These elements will include:

- Number of total miles
- Number of total miles of pipeline inspected in the system versus program requirements
- Number of High Consequence Area (HCA) miles in the IMP program
- Number of HCA miles inspected
- Number of immediate repairs completed in HCA as a result of IMP
- Number of scheduled repairs completed in HCA as a result of IMP
- Number of leaks in HCA classified by cause
- Number of failures in HCA classified by cause
- Number of incidents in HCA classified by cause

For the first gas transmission integrity management report required to be submitted to OPS by August 31, 2004, **not all the data elements required in the rule will be collected**, since the developmental nature of operator integrity management programs would make all mileage numbers unreliable and subject to change as the programs are completed. Instead, **operators will be asked to report whether they have begun the baseline assessment process** in accordance with the Pipeline Safety Improvement Act of 2002 (as clarified in the OPS Advisory Bulletin). OPS is developing the reporting format for future semi-annual reports, additional details will be provided within the next few months.

**When do I report?**

In accordance with 49 CFR 192.945(a), all regulated gas transmission operators subject to Part 192, Subpart O are required to submit integrity management performance measures semi-annually. **The first report requires a form submission by August 31, 2004 for the period January 1, 2004 to June 30, 2004 and subsequently thereafter for each six month period following.**

The Office of Pipeline Safety published an advisory (49 CFR 192 Docket No. RSPA-00-7666; Advisory Bulletin Number ADB-04-02) on July 22, 2004 outlining the intent for initial collection and subsequent six month collection. OPS is presently taking into consideration various industry comments reflecting the desire for one centralized reporting vehicle and is planning a review of incident and annual reporting formats.

## How do I report?

49 CFR 192.951 provides overall instructions for submitting these and other reports required by Subpart O, including provision for online reporting through the OPS Home Page at <http://ops.dot.gov>.

1. Go to the OPS home page: <http://ops.dot.gov>.
2. Click on the "Gas Integrity Management Performance Reporting" link (in red). *Alternatively, operators may click on the "Online Data Entry" Link and then click on the "Gas IMP" link in the top navigation bar.*
3. Operators will see a log in screen. You should log into the form fields with your operator identification number and your PIN number. If you do not have these access codes, please contact the Information Resources Manager at the contact site below.
4. Once you successfully log in, select the period ending date for the period for which you are reporting (this field should pre-populate with the correct reporting cycle). Press the SELECT PERIOD button. If you are unable to log in, and you receive an error message, it is possible that your operator id has already been included in an "umbrella" reporting by a corporate entity. The system does not allow multiple reports using the same operator id. Please contact us if you have any questions.
5. Operators will see the main form. Your Operator Name is populated automatically. Please correct the Operator Name field if the value shown is incorrect. **This is a required field.** If you are an operator who is reporting for more than one entity, please see number 9 below.
6. State Reporting. The Gas IMP form allows for by state reporting. Operators should select the appropriate state designation for which they are reporting via the use of a drop down menu. If you are an operator with more than one state of operation, you must report for each state. You simply select the appropriate state from the drop down menu, click the ADD STATE button, and continue until all states have been added. This functionality is required in order to match up with annual reporting features. If you are an operator who has already reported, but who included multiple states in one "umbrella" reporting and you now wish to separate out states, please contact Ed Chernosky at the contact information on the last page of these instructions.
7. Complete the contact field indicating the name of the primary contact for this submission. This is a required field.
8. Complete the phone number field indicating the primary phone number for the contact entered above. This is a required field.
9. Complete the e-mail field indicating the e-mail address of the contact entered above.
10. To report for multiple operators, press the ADD OPERATOR button. Enter the operator ID for the operator to be added. Press the ADD OPERATOR button to force the system to accept your addition. Repeat steps to add all of the desired operators. If you do not know the operator id for those entities you wish to incorporate in your "umbrella" reporting, please contact the Information Resources Manager (address follows).
11. If you have added an operator in error, you can remove that operator from your submission. To do so, press the REMOVE button next to the operator you wish to delete. **YOU ONLY NEED TO CLICK THE REMOVE BUTTON ONCE** for the system to remove the information.
12. Select a CONFIRMATION option indicating one of the below:
  - a. *that you have begun the preliminary baseline assessments;*
  - b. *or that you have not begun the preliminary baseline assessments (explain in narrative);*
  - c. *or that you have begun the preliminary baseline assessments and have not identified any HCAs or that there are no HCAs.*

**This section is required.** Please see the definition of "have begun the preliminary baseline assessments" below. You may also click on the "instructions for this form" link on the online report form to view the definitions. In the online instructions, the section outlining the "have begun" definitions appear bolded in red.

If you previously reported under the former instructions prior to August 17, 2004, and selected "I have not

begun”, and have previously added narrative that you had not identified HCAs, you **do not** need to re-report. OPS will resolve the discrepancy for you.

13. If you have not begun the preliminary baseline assessments, please provide a narrative description of how you plan to achieve program compliance within the designated timeframe.
14. Once you have completed the confirmation section, you will see a series of grayed boxes reading “Gas IMP for Operator 1234”. As stated above, you DO NOT need to report on these fields in this reporting. The fields are provided as a courtesy only to indicate the fields for future data collection. OPS is presently determining the most appropriate means for future reporting.
15. When finished, press the SAVE REPORT button.
16. You will be presented with the information that you have entered. Please review the information for accuracy. If the information is correct, press the YES – SUBMIT button. If you wish to edit your report, press the NO – EDIT button to re-enter the form.
17. Once your information has been saved to the database, you will view a confirmation page which you should print for your records.

### What does “have begun the preliminary baseline assessments” mean?

The Pipeline Safety Improvement Act of 2002 (49 USC 60109) requires that pipeline operators **begin** baseline assessment of gas transmission pipeline in High Consequence Areas (HCAs) by June 17, 2004.

Operators can refer to the Office of Pipeline Safety Gas Integrity Management Advisory Bulletin ADB-03-07 of November 17, 2003 (68 FR 64948) for an explanation of how RSPA/OPS interprets the statutory requirement “to begin assessments” and for guidance on what steps RSPA/OPS considers acceptable to begin the baseline assessment process to meet the intent of the statute. Examples of business activity indicating the commencement of program requirements include; (a) you have contracted with a smart pig provider; (b) you have implemented launchers and receivers; or (c) you have identified your HCAs and finalized the location of your first segment.

**How do I know if I am required to report under this program?** The gas integrity management rule applies to gas transmission operators jurisdictional to 49 CFR Part 192. This rule became effective February 14, 2004.

In determining if an intrastate pipeline meets the definition of a transmission line set out in Part 192.3, an operator must consider the factors listed in 192.3(a)-(c) of the pipeline safety regulations. The terms “storage facility” and “distribution center” are not defined in the pipeline safety regulations. Therefore, for states participating in the Natural Gas Pipeline Safety Program, the OPS will recognize the individual state determination of these terms when designating a pipeline as a distribution or transmission pipeline.

### What can I expect to be required to report in future performance metrics?

1. As stated in the Gas Integrity Management Rule, the performance measures as described in the ASME B31.8S – 2001 (page 31) are the performance measures operators will be required to submit semi-annually.
2. OPS plans to require total year data on the end-of-year report, rather than the second-half data.

**What are the form fields that I see “shadowed”?** The program reporting form fields you see shadowed are required for future reporting and are provided only as a courtesy to the operator for planning purposes. These reflect data fields

that OPS considers might be subject to change if reported now, due to the developmental nature of operator integrity management programs. You are not required to submit this information at this time.

**What if I have electronic submittal difficulty?** OPS strongly encourages operators to report via the Internet, but will accept paper reporting submissions from operators who cannot report via electronic means. If you need to utilize this option, please contact us below. All forms and instructions are available via the Internet at the OPS home page, <http://ops.dot.gov> in the OPS FORMS section of the ONLINE LIBRARY.

**What if I need to change my report form after I submit it?**

To change a report submission, please follow the same process as the initial submission. After you select the period ending date, the form will populate with the data from your previous submission. Simply correct the data and resubmit the report, using the same process as the initial submission. Both the previous submission and the corrected submission are saved in the database.

**Definitions (from ASME/ANSI B31.8S, where available):**

**Failure** is a general term used to imply that a part in service: has become completely inoperable; is still operable but is incapable of satisfactorily performing its intended function; or has deteriorated seriously, to the point that it has become unreliable or unsafe for continued use. The term "failure" is commonly meant to designate the universe of failures (please see the definition of leak and incident for clarification). The term "failure" is often used as a "catch-all" category for those reportable events not normally falling under the realm of a definable leak (normally reported on the annual) or a definable incident (normally reported on the incident report).

**IMP** means Integrity Management Program as required by 49 CFR Part 192, Subpart O,

**Incident** means an unintentional release of gas due to the failure of a pipeline. An incident is a release of product from a pipeline that may or may not result in death, injury, or damage to property or the environment. The term does not address intentionality of the individuals in the release of the product. For many people, "accident" implies unintentionally; "incident" is considered to be more encompassing and includes terrorist attacks, sabotage, and other events that are intentional, in addition to unintentional acts. The term "incident" is commonly considered a subset of "leak". A reportable pipeline incident for natural gas transmission pipelines is currently defined in 49 CFR 191 as an incident that is considered significant by the operator or that results in (a) a fatality; (b) an injury requiring hospitalization; (c) property damage, including cost of cleanup and recovery, value of lost product, and damage to the property of the operator or others, or both, of \$50,000 or more; or (d) a release of gas.

**HCA** means High Consequence Area, as defined in 49 CFR 192.903.

**Leak** means an unintentional escape of gas from the pipeline. The source of the leak may be holes, cracks (include propagating and non-propagating, longitudinal and circumferential), separation or pull-out, and loose connections. The term "leak" is commonly considered a subset of "failure".

**Program Requirements** means the number of HCA miles in the IMP program.

## Resources

For Operator ID/PIN problems, please contact:

Catapult Technology  
Mr. Jefferson Tancil  
(202) 366-8075

For technical questions on electronic submission, please contact:

Catapult Technology  
Mr. Edwin Chernosky  
(202) 366-8829

For information on these instructions, reporting forms, or the Office of Pipeline Safety programs, please contact:

Office of Pipeline Safety  
Information Resources Manager  
Ms. Shauna Turnbull  
(202) 366-3731  
shauna.turnbull@rspa.dot.gov

For questions concerning the Gas Integrity Management regulations please contact:

Office of Pipeline Safety  
Mr. Mike Israni (202) 366-4571

Program resources, fact sheets, and amplifying information can be located at:

<http://primis.rspa.dot.gov/gasimp/>