

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

11/20/2008

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 with OMB Control No. 2137-0610 expires 5/31/09.

Clarifying Guidance – Time Periods:

There has been some confusion concerning the time period over which data must be aggregated for reporting. The following general guidance is provided in this regard:

- There are two kinds of data that must be reported
 - Data reflecting status at a particular point in time (e.g., total number of transmission miles and the total number of miles in HCA – Items 9a and 9c), and
 - Data reflecting activity that occurs over a period of time (e.g., number of miles inspected)
- Status data, indicated in the instructions by the phrase **“existing as of the end date of this reporting period,”** should be reported based on the total existing on the end date of each semi-annual report (either June 30th or December 31st depending on the semi-annual report).
- Activity data, indicated in the instructions by the phrase **“during this reporting period,”** should be reported based on the activity occurring during the individual reporting period
 - For the reporting period “January 1st through June 30th” to be submitted by August 31st (reference 49 CFR 192.945(a)), only data from activities occurring from January 1st through June 30th should be reported. This is considered an interim report for the year.
 - For the reporting period “January 1st through December 31st” to be submitted by February 28th, data from the entire year should be reported, i.e., the data from January 1st through June 30th (with any necessary corrections) should be added to data from July 1st through December 31st so that annual totals are reported for a given year. This is considered a complete end-of-year report for the given year.
- No reports should include data from prior years. This is excepting the 2004 report which included prior assessment data credited as baseline assessments in accordance with the rule. If a need to change data reported for prior years is identified, operators should edit their end-of-year report for that year (see step 4 in the “How do I report” instructions below).

What am I reporting?

49 CFR 192.907(a) requires that operators of gas transmission pipelines develop integrity management programs by December 17, 2004. These plans must include performance measures including:

- Number of total miles
- Number of total miles of pipeline inspected in the system as a result of the IMP rule (i.e., includes testing coincidental to IMP rule, namely miles in non-HCA that nonetheless were tested as a result of compliance with the IMP rule)
- Number of High Consequence Area (HCA) miles in the IMP program
- Number of HCA miles inspected via IMP baseline assessments
- Number of immediate repairs completed in HCAs as a result of IMP baseline assessments
- Number of scheduled repairs completed in HCAs as a result of IMP baseline assessments
- Number of HCA miles inspected via IMP reassessments
- Number of immediate repairs completed in HCAs as a result of IMP reassessments
- Number of scheduled repairs completed in HCAs as a result of IMP reassessments
- 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, which was required to be submitted to OPS by August 31, 2004, not all the data elements required in the rule were collected, since the developmental nature of operator integrity management programs would have made all mileage numbers unreliable and subject to change as the programs were completed. Operators were required to have identified their high consequence areas by December 17, 2004, and thus should now have firm mileage data. Accordingly, quantitative performance measures must be reported. The report due February 28, 2005, should have included data covering all of calendar year 2004. Subsequent reports should be complete for the appropriate reporting period.

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 reports must be complete through June 30 and December 31 of each year and must be submitted by two months after this date. The report submitted in August should include data for the first half of the calendar year (January 1st through June 30th). The report submitted in February should include data covering the entire calendar year (i.e., January 1st through December 31st, updating the information in the August report).

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. Access the Gas IMP reporting system using one of the following methods.
 - a. Go to the OPS home page: <http://ops.dot.gov>. Click the “Gas Integrity Management Performance Reporting” link on the left hand side.
 - b. Use the link: <http://opsweb.rspa.dot.gov/gasimp>
2. Log in
 - a. Log into ODES using your Operator ID and PIN. Do not use leading zeros on the Operator ID.
 - b. If you do not have an Operator ID or PIN, please contact Jefferson Tancil at (202) 366-8075.
3. Reporting period
 - a. Select the reporting period for which you want to report
4. List of reports
 - a. If you have previously submitted a report for the selected reporting period, you will see a list of previously submitted reports.
 - b. You can edit one of the previously submitted reports by pressing EDIT REPORT.
 - c. You can submit a new report by pressing ADD NEW REPORT.
5. Operator Information
 - a. The Operator ID field is populated based on the information you provided upon logging into the system.
 - b. Complete the Operator Name field.
6. Contact Information
 - a. Complete the CONTACT field for the report submission.
 - b. Complete the PHONE field for the report contact.
 - c. Complete the E-MAIL address field for the report contact. This address will be used to automatically send a copy of the report upon completion.
7. **Senior Executive Officer’s Signature Certifying Information as required by 49 U.S.C. 60109(f)**
 - a. Name: Enter the name of the Senior Executive Officer’s Signature Certifying Information as required by 49 U.S.C. 60109(f)
 - b. Signature: **Entering the name of the Senior Executive Officer (see a above) in the signature field represents an official signature.**
 - c. Phone: Provide the Senior Executive Officer’s phone number.
 - d. Email: Provide the Senior Executive Officer’s e-mail address.
8. Related Operators
 - a. To add additional operators to the report, press the ADD OPERATOR button.
 - b. Enter the Operator ID for the operator which you want to add.
 - c. Press the ADD OPERATOR button to add the operator.
9. Select one of the following options:

a. "I have not identified HCAs". If you select this option, you may complete the comments field if you would like. Please skip to step #13 – "Save Report"

b. "I have identified HCAs." If you select this option, please continue to step #9 – "Performance Measures"

10. Performance Measures

a. Complete NUMBER OF TOTAL MILES (TRANSMISSION, INCLUDING ONSHORE AND OFFSHORE) (Total number of transmission miles, including onshore and offshore but excluding gathering, **existing as of the end date of this reporting period**)

b. Complete NUMBER OF TOTAL MILES INSPECTED as a result of the IMP rule (i.e., includes miles inspected via IMP assessments coincident to the rule – total of HCA and Non-HCA – **during this reporting period**. For the 2004 reporting period, include mileage of inspections conducted prior to 2004 that were credited as baseline assessments.)

c. Complete NUMBER OF TOTAL HCA MILES IN THE IMP PROGRAM (**existing as of the end date of this reporting period**)

d. Complete NUMBER OF HCA MILES INSPECTED VIA IMP BASELINE ASSESSMENTS (**during this reporting period**)

e. Complete NUMBER OF IMMEDIATE REPAIRS COMPLETED IN HCAs AS A RESULT OF IMP BASELINE ASSESSMENTS (**during this reporting period**)

f. Complete NUMBER OF SCHEDULED REPAIRS COMPLETED IN HCAs AS A RESULT OF IMP BASELINE ASSESSMENTS (**during this reporting period**)

g. Complete NUMBER OF HCA MILES INSPECTED VIA IMP REASSESSMENTS (**during this reporting period**)

h. Complete NUMBER OF IMMEDIATE REPAIRS COMPLETED IN HCAs AS A RESULT OF IMP REASSESSMENTS (**during this reporting period**)

i. Complete NUMBER OF SCHEDULED REPAIRS COMPLETED IN HCAs AS A RESULT OF IMP REASSESSMENTS (**during this reporting period**)

(Note: Assessed mileage should be counted once regardless of the number of inspections conducted. Thus, mileage inspected by both ECDA and ICDA or by both a deformation tool and an MFL pig should be reported only once).

11. Number of Leaks in HCA classified by cause (**during this reporting period**)

a. To add leaks to the report, press the ADD LEAKS button.

b. Select one of the causes from the drop down menu.

c. Specify the number of leaks.

d. Press the ADD LEAKS button.

12. Number of Failures in HCA classified by cause (**during this reporting period**)

a. To add failures to the report, press the ADD FAILURES button.

- b. Select one of the causes from the drop down menu.
 - c. Specify the number of failures.
 - d. Press the ADD FAILURES button.
13. Number of Incidents in HCA classified by cause
(during this reporting period)
- a. To add incidents to the report, press the ADD INCIDENTS button.
 - b. Select one of the causes from the drop down menu.
 - c. Specify the number of INCIDENTS.
 - d. Press the ADD INCIDENTS button.
14. Save Report
- a. When finished with the form, press the SAVE REPORT button.
 - b. If any required fields were not completed, you will be prompted to complete them.
15. Confirm Report
- a. Review the report information
 - b. If the report is correct, press the YES – SUBMIT REPORT button.
 - c. If the report is not correct, press the NO – EDIT REPORT button.
16. Report Receipt
- a. You will view a printable confirmation page which you can print for your records.
 - b. A copy of the report is automatically sent to the e-mail address provided in Contact Information.

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. All operators with transmission pipeline are required to report. Operators with transmission pipeline but which have no mileage in high consequence areas may report this fact using a comment field on the reporting form; this information will help OPS schedule integrity management inspections.

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 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 or call Jefferson Tancil at (202) 366-8075. 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:

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. If an event involves the unintentional release of gas, it should be reported as an incident or leak.

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

Immediate Repair is defined by 49 CFR 192.933(d)(1)

Incident means an event meeting the criteria in the definition in 49 CFR 191.3:

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, or

An event that is significant, in the judgment of the operator, even though it did not meet the criteria above.

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

Leak means an unintentional escape of gas from the pipeline. This would include any unintentional release of gas from a pipeline that does not result in an injury, death, or \$50,000 in property damage.

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

Scheduled Repair means a repair scheduled in accordance with ASME 31.8S, Section 7, Figure 4 as required by 192.933(c) and One-year conditions as identified under 192.933(d)(2) as they are also required to be prioritized for repair according to a schedule. This results in all repairs required by the rule except for immediate repairs being accounted for under the "Scheduled Repairs" category of the "Performance Measure Reports."

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 questions concerning the Gas Integrity Management regulations please contact:

Mr. Roger Little, Roger.Little@dot.gov

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

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