Process Safety Management in the Pipeline Industry: Parallels and Differences between the Pipeline Integrity Management (IMP) Rule of the Office of Pipeline Safety and the PSM/RMP Approach for Process Facilities

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ABSTRACT

In 2001, the federal Office of Pipeline Safety promulgated its Pipeline Integrity Management Rule for hazardous liquid pipelines. A similar rule for gas pipelines is due in 2002. These rules derive from formal risk management initiatives of both the pipeline industry and the regulators beginning of the early to mid-1990s. The initiatives and resulting rules built on many of the process safety and risk management concepts and frameworks of the process industries, as modified for pipelines. Looking closely at the parallels and the differences is an interesting study of how the technical, public and industry-specific requirements affect the types of regulations, supporting management system frameworks and the technical activities for improving hazardous materials process safety. This paper is based on the experience of the author in project work with federal and state regulators and with industry groups and companies, in both the process and pipeline industries over the last 17 years. It provides insights into various alternative pathways for communicating process safety concepts and improving process safety as the concepts are translated into specific company and even individual employee actions. It specifically highlights how the commonalities and differences in the types and configurations of physical assets and operating practices of the pipeline companies and process facilities affect respective cultures, language and actions for process safety management, translated for a pipeline as pipeline integrity management.