



DIMP State-Federal Implementation Team Pilot Inspection Findings & Lessons Learned



National Association of Pipeline Safety Representatives and Office of Pipeline Safety

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May 25, 2011



DIMP Webinars

DIMP Communications: Public Meetings, Webinars, Webcasts, and State Seminars

DIMP Communications: Public Meetings, Webinars, Webcasts, State Seminars and Other Meetings –

- AGA Operations Conference & Biennial Exhibition, Nashville, TN, May 25, 2011
- State-Federal DIMP Implementation Team Webinar, June 8, 2011 from 10:30 AM to 12:30 PM Eastern Standard Time. The webinar recently completed a series of pilot inspections of gas distribution operators' distribution integrity management programs. In two webinars, the topics presented should include: the Team's findings and general observations from the pilot inspections; the DIMP inspection forms; and a question and answer session.

Members of the public may also submit written questions, either before, during, or after the webinar. Questions may be submitted through LiveMeeting during the webinar.

Comments can be submitted before and after the webinar through the DIMP website on the page. Comments may also be submitted through LiveMeeting during the webinar.

Members of the public may attend this free webinar. To help assure that adequate space is provided for questions and answers, registration, the LiveMeeting information will be distributed. Due to the limited capacity, we encourage registration through the audio feature of LiveMeeting and not a standard phone line for the voice portion of the Webinars.

The webinars will be recorded and available for viewing at a later date. For further information, contact the DIMP Team at [dimp@phmsa.dot.gov](#) or visit the DIMP website. For the agenda, [click here](#).

- SGA Operating Conference & Exhibits, Jacksonville, FL, July 12-14, 2011
- [Regulations and Code Compliance State Seminars](#) (South Dakota, Nebraska, Georgia, Texas, Missouri)

DIMP Communications: Public Meetings, Webinars, Webcasts, and State Seminars – **Completed**

- [State-Federal DIMP Implementation Team Webinar, May 10, 2011](#) Members of the State and Federal DIMP Implementation Teams recently completed a series of pilot inspections of gas distribution operators' distribution integrity management programs. This webinar will discuss the findings of operators in implementing their plan; the DIMP inspection forms; and a question and answer session.

Using
LiveMeeting
Computer
Audio & Video

Register for
June 8th Webinar

View
May 10th Webinar



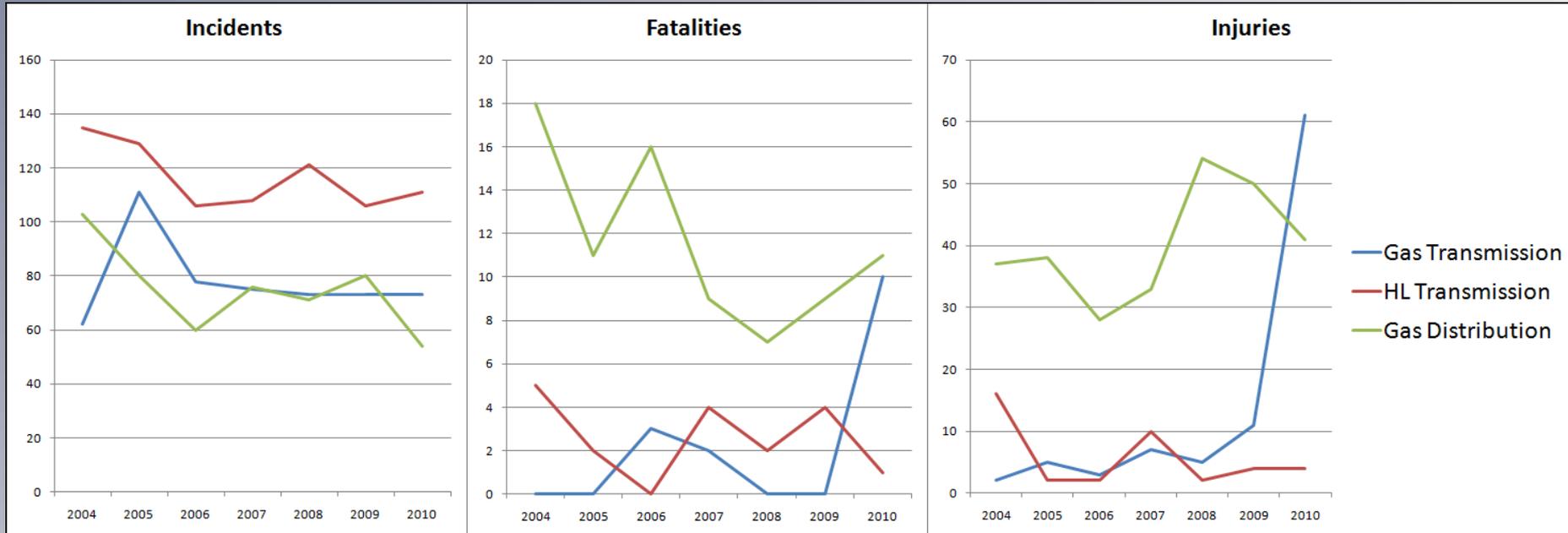
Today's Topics

- 1. Why DIMP?**
- 2. DIMP Pilot Inspection Findings & Lessons Learned**
- 3. DIMP Website Navigation & Resources**
- 4. DIMP Inspection Forms**
- 5. Questions**



Need for DIMP

Distribution incidents continue to occur



...resulting in significant consequences.



PIPELINE SAFETY AWARENESS

Official U.S. Government Website for Pipeline Safety Awareness



U.S. Department of Transportation

Pipeline & Hazardous Materials Safety Administration

HOME

DOT ACTION

PIPELINE SYSTEMS

FACTS & STATS

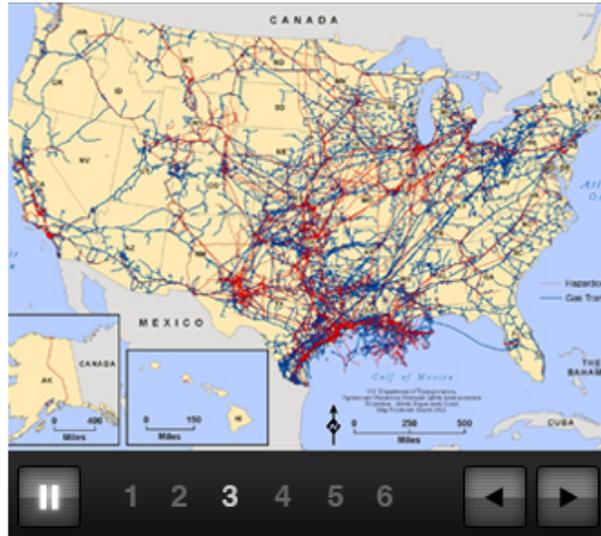
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National Pipeline Mapping System

OPS and its State Partners inspect about 2.5 million miles of hazardous liquid and natural gas pipelines transporting the products from their origins to customers throughout the U.S. The map shown here is part of a secure mapping system. You can learn about the National Pipeline Mapping System and pipelines in your county by clicking on the following links:

[>> Find Pipelines in Your Area](#)

[>> Find Pipeline Operators in Your Area](#)



Secretary Ray LaHood, Pipeline and Hazardous Materials Safety Administrator Cynthia Quarterman at a recent event highlighting National Safe Digging Month and the importance to call 811 before any digging project.

A Call to Action To Address Pipeline Infrastructure Risks

More than 2.5 million miles of pipelines deliver energy to homes and businesses across America, and our job at the U.S. Department of Transportation is to ensure that every mile is safe. Doing this job right is important because protecting the infrastructure is critical to the U.S. economy and our everyday lives. [read more](#)

The Obama Administration's Accomplishments in Pipeline Safety

Under the Obama Administration, PHMSA continues to provide strong safety and environmental oversight of the pipeline network that delivers energy fuels to the American public. An overview of the actions taken by this administration, can be found [here](#).



2011 Pipeline Safety Forum : April 18



National Pipeline Mapping System

[>> Find Pipelines in Your Area](#)

[>> Find Pipeline Operators in Your Area](#)

RECENT INCIDENTS



San Bruno, CA
[\[More\]](#)



Allentown, PA
[\[More\]](#)



Marshall, MI
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GENERAL INFORMATION ABOUT INCIDENTS

NEW [Proceedings from the April 18, 2011 National Pipeline Safety Forum](#)

<http://opsweb.phmsa.dot.gov/pipelineforum/>



Pilot Inspection Findings & Lessons Learned

- Objective of DIMP Pilot Inspections
- General Observations
- Shortcomings Found in Plans
- Guidance for Operators From Pilot Inspections

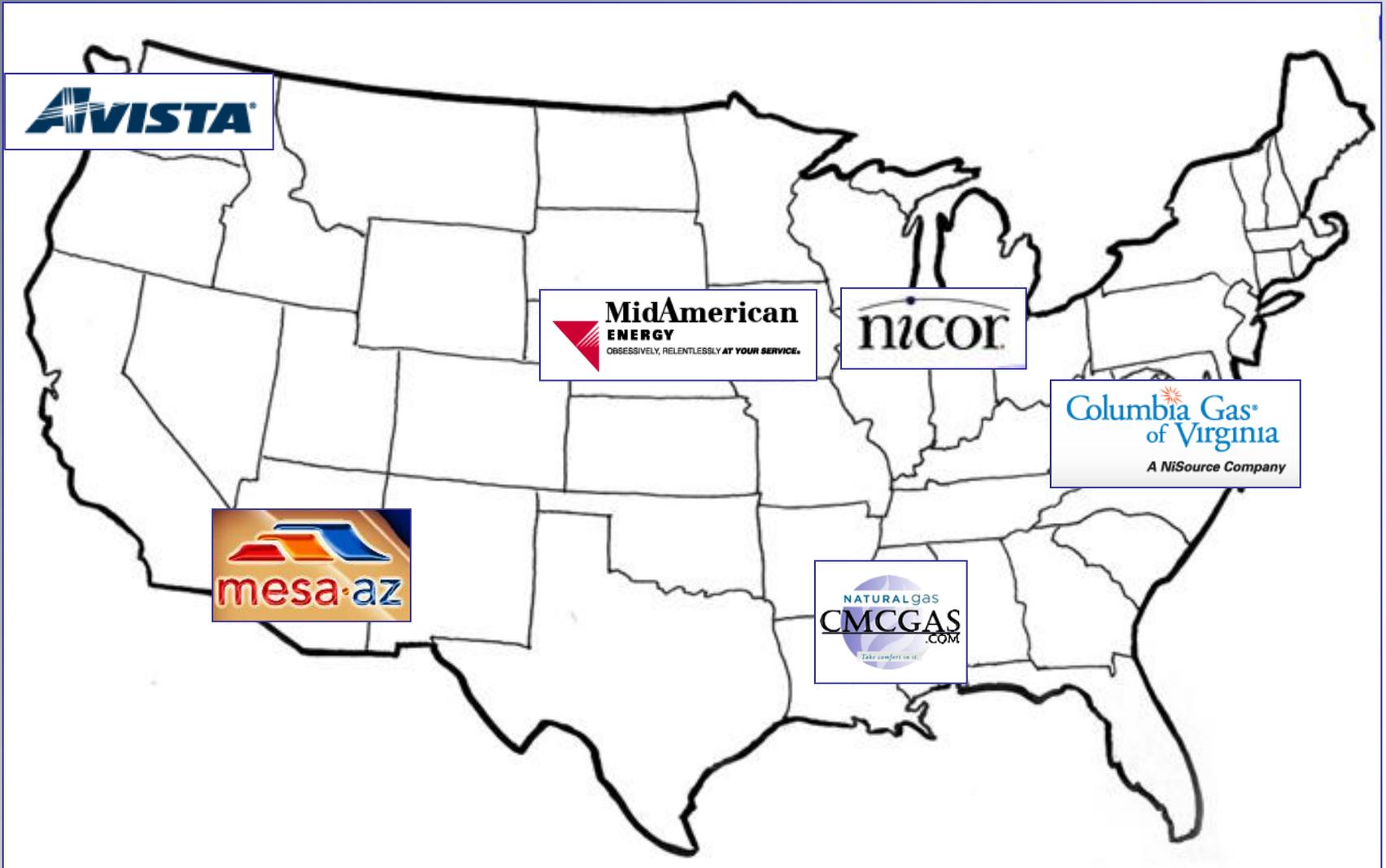


Objective of DIMP Pilot Inspections

- Test the inspection form:
 - Are the inspection questions clear?
 - How did the operator interpret the question?
 - Did the documentation the operator provided demonstrate compliance with the regulation?
 - What level of detail was provided?
- Identify if additional FAQ's are needed.
- Develop a consensus for expectations among regulators.



Operators Selected





General Observations

- Large, serious effort - began 2007 to early 2010
- Few fully dedicated DIMP personnel; many teams
- Many operators are using GPTC and SHRIMP
- Modifying commercial plan development and risk model tools
- Change from compliance to integrity management culture
 - Forces a structured approach to prioritize work.
 - Provides “compliance leverage” for funding system integrity projects.



General Observations

Operators are taking a deep look at data:

- Scrubbing data
- Modifying data collection procedures
- Enhancing training on data collection
- Improving/implementing computer applications and hardware (office and field)
- Requires geographical relationship of data
- Documenting reason for data anomalies
- Using a minimum of 5-10 yrs, sometimes using much more to develop trend lines.



General Observations

- DIMP should address system integrity issues through data analysis; Newly identified issues may require immediate action
- Substantive effort for apparent cause analysis of mechanical fitting failures (field extraction and lab analysis)
- Not many new risks identified; operators tended to focus on known risks rather than look for other risks
- Variety of risk models; material specific replacement models to models including all threats to system



Shortcomings Found in Plans

- Plans failed to include revision log, version, effective date, revision date.
- Procedures lacked:
 - Operator specific practices and system characteristics.
 - Description of who, what, when, where, and how.
 - References to procedures in other manuals (O&M)
- Not considering failures without a release, e.g. overpressurization events



Shortcomings Found in Plans

- System subdivision was not sufficient to identify problems.
- Risk ranking did not include all risks to all facilities.
- Measures to reduce risk were too focused on pipe replacement rather than preventative measures designed to reduce risk.



Expectation of an Operator Plan

- Develop and Implement the elements
 - “Implemented”
 - Completed risk evaluation
 - Identified measures to address risk
 - Allocated and scheduled resources
 - FAQs C.3.8 & C.8.3 discuss what operators need to have implemented by August 2, 2011?
- Multi-state operators create a risk ranking which:
 - Encompasses all of an operator’s facilities
 - Can be filtered by state so that it can be reviewable on a state-by-state basis
- Plan can apply to one or more states



Knowledge Guidance

- “Reasonably available” information
 - Digging up pipe not required
 - FAQ C.4.a.5 What comprises "reasonably available" information?
 - Has impact on current or future pipe integrity
 - May be offsite warehouse
 - To demonstrate include a list of information sources used showing the title, date range (why selected), location
- Include a list of the data needed to fill gaps due to missing, inaccurate, or incomplete records
- Update recordkeeping procedures to include obtaining or correct missing or questionable data



Threat Identification Guidance

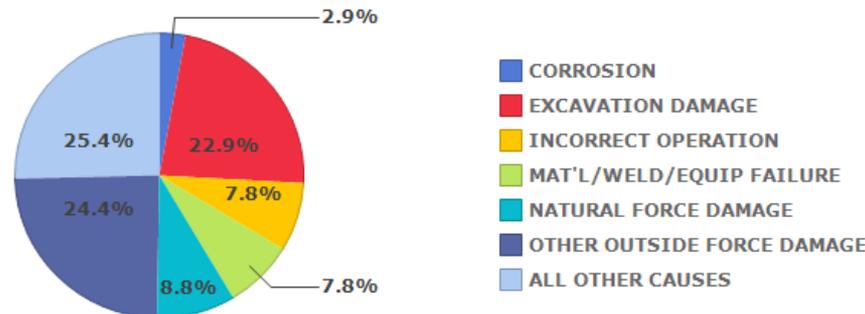
- Good practices that operators were performing:
 - Creating threat matrices
 - Summarizing trending of historical leaks and leak repairs
 - Distinguishing future “unknown” leaks eliminated by replacement
 - Trending “mean year of installation” – older pipe replacement.
 - Looking at rolling averages, takes out yearly anomalies.
 - Correlating system characteristics to failure rate.
- Geographic relationship of data is critical
- Identify failures without a release, e.g. overpressurization events



Threat Identification Guidance

- Potential threats are threats where the operator has not experienced a failure but they have conditions conducive to the threat
- Examples of potential threats:
 - Hurricanes or Flooding
 - Trenchless technology – unknowingly bored thru sewer

Significant Incident Cause Breakdown
National, Gas Distribution, 2008-2010



Source: PHMSA Significant Incidents Files March 1, 2011



Risk Evaluation Guidance

- Understand how your risk model works. Each current and potential threat requires a consequence and likelihood weighting
- Subdivide facilities by measures to reduce risk; balance enough granularity with too much granularity to identify problems
- “Reasonable result” – is the ranking reasonable, justified through quantitative data, in agreement with SME validation?



Measures to Reduce Risk Guidance

- Include all risk reduction measures required by the DIMP risk evaluation in your plan.
- Additional risk reduction measures you voluntarily perform may be included in their plan but are not required to be
- Examples
 - Hurricane Plans to shut in systems
 - Patrol and leak survey more frequently than code
 - Monthly rectifier readings
 - Riser replacement programs
 - Cast iron surveys after earthquakes
 - Pipe replacement program



“Effective” Leak Management Guidance

An *Effective Leak Management Program* includes but is not limited to the following:

- **L**ocate the leaks in the distribution system;
- **E**valuate the actual or potential hazards associated with these leaks;
- **A**ct appropriately to mitigate these hazards;
- **K**eep records; and
- **S**elf-assess to determine if additional actions are necessary to keep people and property safe.

An operator must either include the leak management program procedures in its DIMP plan or reference the procedures in your O&M.



Performance Measures Guidance

- Each measure or group of measures to reduce a risk needs a performance measure
- Establish a baseline for every performance measure
 - May only have one data point as the data will be collected going forward
 - Explain why that performance measure was chosen
 - Describe how the data is or will be collected



Performance Measure Example

Threat:

Other Outside Forces, Damage to above ground facilities by vehicles and vandalism.

Measures to Reduce Risk:

- Idle riser program for monitoring and maintaining idle risers.
- High priority to meters at risk of future vehicular damage identification program. Work Request packets created and work prioritized for meters in vehicular zones.

Performance Measure:

Track and monitor the frequency of failures due to vehicles in vehicular zones.



Periodic Evaluation and Improvement Guidance

- What are possible program review triggers?
 - Completion of a measure to reduce risk
 - Completion of a replacement program
 - Leak rate are not decreasing
- Solely rerunning the risk model or reviewing the performance measure data does not constitute a review



Periodic Evaluation & Improvement Guidance

What constitutes a program review?

- Review frequency of periodic evaluation, < 5 years
- Verify general information
- Incorporate new system information
- Re-evaluation of threats and risk
- Review the frequency of the measures to reduce risk
- Review the effectiveness of the measures to reduce risk
- Modify the measures to reduce risk and refine/improve as needed
- Review performance measures, refine/improve as needed



Records Guidance

- Maintain records demonstrating compliance for 10 years
 - Includes records used for knowledge, threat identification, risk evaluation
 - Measures to address risk documentation
 - Performance measures use to evaluate effectiveness
 - For example, if 20 years of CP records were reviewed, maintain them for 10 additional years



DIMP WEBSITE NAVIGATION & CONTENTS



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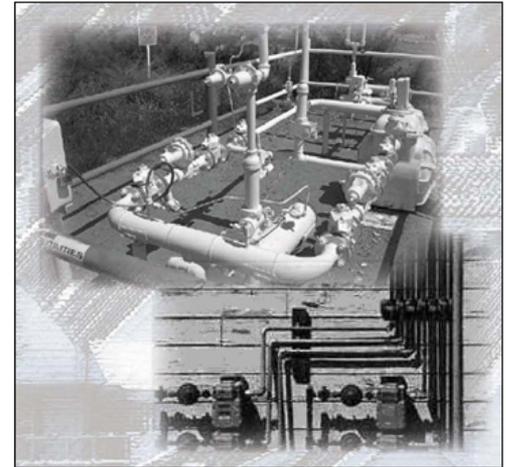


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Distribution Integrity Management

The Pipeline and Hazardous Materials Safety Administration (PHMSA) published the final rule establishing integrity management requirements for gas distribution pipeline systems on December 4, 2009 (74 FR 63906). The effective date of the rule is February 12, 2010. Operators are given until August 2, 2011 to write and implement their program.

PHMSA previously implemented integrity management regulations for [hazardous liquid](#) and [gas transmission](#) pipelines. These regulations aim to assure pipeline integrity and improve the already admirable safety record for the transportation of energy products. Congress and other stakeholders expressed interest in understanding the nature of similarly focused requirements for gas distribution pipelines. Significant differences in system design and local conditions affecting distribution pipeline safety preclude applying the same tools and management practices as were used for transmission pipeline systems. Therefore, PHMSA took a slightly different approach for distribution integrity management, following a joint effort involving PHMSA, the gas distribution industry, representatives of the public, and the National Association of Pipeline Safety Representatives to explore potential approaches.



The regulation requires operators, such as natural gas distribution companies to develop, write, and implement a distribution integrity management program with the following elements:

- Knowledge
- Identify Threats
- Evaluate and Rank Risks
- Identify and Implement Measures to Address Risks
- Measure Performance, Monitor Results, and Evaluate Effectiveness
- Periodically Evaluate and Improve Program
- Report Results

The DIMP Inspection Forms as well as other resources to support operators implement their program are on the [DIMP Resources page](#) and through [PHMSA's Pipeline Safety website](#).

PHMSA has developed and continues to enhance guidance to help the public and the affected industry understand the requirements of the final rule in the form of [FAQs](#).



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DIMP Communications: Public Meetings, Webinars, Webcasts, State Seminars and Other Meetings – **Upcoming**

- AGA Operations Conference & Biennial Exhibition, Nashville, TN, May 25, 2011
- State-Federal DIMP Implementation Team Webinar, June 8, 2011 from 10:30 AM to 12:30 PM EDT Members of the State and Federal Distribution Integrity Team recently completed a series of pilot inspections of gas distribution operators' distribution integrity management programs. The team will sponsor two separate and two webinars, the topics presented should include: the Team's findings and general observations from the pilot inspections; regulators' expectations of open inspection forms; and a question and answer session.

Members of the public may also submit written questions, either before, during, or after the webinar.

Comments can be submitted before and after the webinar through the DIMP website on the page titled, "Questions and Comments for OPS" <http://primis.phmsa.gov> be submitted through LiveMeeting during the webinar.

Members of the public may attend this free webinar. To help assure that adequate space is provided, all attendees are required to register for the webinar at <http://primis.phmsa.gov> registration, the LiveMeeting information will be distributed. Due to the limited capacity, we encourage and request that parties at the same location share a audio feature of LiveMeeting and not a standard phone line for the voice portion of the Webinars.

The webinars will be recorded and available for viewing at a later date. For further information, contact Chris McLaren by e-mail at Chris.McLaren@dot.gov or by

- 1. Search for Upcoming Meetings**
- 2. View Past Presentations**



DIMP History

1. DIMP FR Notices
2. Key Historical DIMP Documents
3. Future "History of DIMP"



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DIMP Documents

The following documents were created during the development of the Distribution Integrity Management rule.

- [Federal Register notice for Mechanical Fitting Failure Reporting Requirements \(2011\)](#)
- [Federal Register notice for the Information Collection Gas Distribution Annual Report Form \(2010\)](#)
- [Federal Register notice correction for the Integrity Management Program for Gas Distribution Pipelines \(2010\)](#)
- [Federal Register notice for extension of comment period for compression coupling failure reporting and annual report information \(2010\)](#)
- [Federal Register notice for Integrity Management Program for Gas Distribution Pipelines Final Rule \(2009\)](#)
- [Advisory Bulletin ADB-86-02, Issues Related to Mechanical Couplings Used in Natural Gas Distribution Systems \(Issued 1986, Revised 2009\)](#)
- [Federal Register notice for Integrity Management Program for Gas Distribution Pipelines for Notice of Proposed Rulemaking \(2008\)](#)
- [Damage Prevention Assistance Program \(DPAP\): Strengthening State Damage Prevention Programs \(2008\)](#)
- [Pipeline Inspection, Enforcement, and Protection Act of 2006 \(PIPES\)](#)
- [DIMP Integrity Management for Gas Distribution: Report of Phase 1 Investigations\(2005\)](#)



DIMP Resources



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DIMP Resources

DIMP Inspection Forms

The State-Federal DIMP Implementation Team was created to support improvements in the integrity of the Nation's gas distribution system through the evaluation of an Operator's Distribution Integrity Management Program. The Team developed inspection forms for evaluation of DIMP programs under their individual state statutory authority. Since State authority and regulatory structures differ, operators should refer to their state pipeline for more information. Two inspection forms were created:

1. [DIMP Inspection Form 192.1005 Operators_05.02.2011 in PDF](#) (All operators except master meter/small LPG operators)
2. [DIMP Inspection Form 192.1005 Operators_05.02.2011 in Word 2007](#) (All operators except master meter/small LPG operators)
3. [DIMP Inspection Form 192.1015 Operators_04.11.2011 in PDF](#) (Master meter/small LPG operators)
4. [DIMP Inspection Form 192.1015 Operators_04.11.2011 in Word 2007](#) (Master meter/small LPG operators)

Technical Reports

The following reports are intended to serve as a technical resource for OPS and State pipeline operators:

- Mechanical Damage in Pipelines, Final Report, Michael Baker Jr., April 2009, [Mechanical Damage in Pipelines](#)
- Pipeline Corrosion, Final Report, Michael Baker Jr. Inc., November 2008, [Final Report on Pipeline Corrosion](#)
- Pipeline Corrosion Poster, [CorrosionPoster.pdf](#)

Distribution Integrity Management: Guidance for Master Meter and Small Liquefied Petroleum Gas

This document provides guidance to help master meter operators and small LPG operators. Operators of larger distribution pipelines should refer to the Gas Piping Technology Committee's [Guidance on Carrying Out Requirements in the Gas Distribution Integrity Management Rule](#).

Gas Piping Technology Committee (GPTC) Guide Material Appendix G-192-8 Distribution Management

The Guide material provides guidance to operators for developing a Distribution Integrity Management Program. The Guide provides operators with practices that may be considered as they develop and maintain their programs. The Guide is published by the Accredited Standards Committee (ASC) Z380, Gas Piping Technology Committee. The Guide may be purchased separately from the entire Guide.

More information can be found at <http://www.aga.org/membercenter/gotocommitteepage>.

SHRIMP - Simple Handy Rule based Integrity Management Plan

A Distribution Integrity Management Programs (DIMP) plan development tool (SHRIMP) was developed through a cooperative agreement, the American Public Gas Association (APGA) provides support for

Industry Associations

Associations host education and training programs which operators may find of assistance in complying with the DIMP regulations.

- 1. DIMP Inspection Forms**
- 2. Technical Reports**
- 4. DIMP Guide for Master Meter/Small LPGSHRIMP**
- 5. GPTC**
- 6. SHRIMP**
- 7. Associations**
- 8. CGA**
- 9. PPDC**
- 10. PHMSA & NTSB Advisory Notices (future)**



DIMP FAQs



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What's New



Frequently Asked Questions

These Frequently Asked Questions (FAQs) are intended to clarify, explain, and promote better understanding of the distribution pipeline integrity management rules. These FAQs are not substantive rules and do not create rights, assign duties, or impose new obligations not outlined in the existing integrity management regulations and standards. Requests for informal interpretations regarding the applicability of one or more of the pipeline integrity management rules to a specific situation may be submitted to PHMSA in accordance with 49 C.F.R. § 190.11.

Here you will find a listing of the most frequently asked questions (FAQs) related to the final rule. You may:

- browse the complete listing of FAQs below, or
- [download](#) the entire set of FAQs in pdf format

--- Select a Category ---

Distribution Integrity Management Frequently Asked Questions

Revision Date: February 9, 2011

A. Excess Flow Valve Requirements

The Integrity Management Program for Gas Distribution Pipelines Final Rule included a revision to 49 CFR Part 192.383 Excess Flow Valve Installation which mandated the installation of excess flow valves (EFV) in certain new and replaced residential service lines.



DIMP Performance Measures



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Performance Measures

Operators are required to identify and implement measures to reduce risk from failure of its gas distribution pipeline. They must measure performance, monitor results, and evaluate effectiveness including the following metrics:

1. Number of hazardous leaks either eliminated or repaired categorized by cause
2. Number of excavation damages
3. Number of excavation tickets (based on One-call tickets)
4. Total number of leaks either eliminated or repaired, categorized by cause
5. Number of hazardous leaks either eliminated or repaired categorized by material
6. Any additional measures the operator determines are needed to evaluate the effectiveness of the operator's IM program in controlling each identified threat.

The first four metrics must be reported by the operator to the state pipeline safety authority if a state exercises jurisdiction over the pipeline and to PHMSA on form PHMSA F 7100.1-1 (Annual Report Form). This report is currently being updated. The approved version can be located on [PHMSA's web site](#). Master meter and small LPG operators not required to report these measures.

OPS will monitor and provide a summary of the progress being made under the DIMP Rule via this web site in the future. Operators first report these metrics on their Calendar Year 2010 Annual Report due March 15, 2011.



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Questions and Comments for OPS

PHMSA will respond to questions submitted via this web site to help stakeholders better understand issues related to the Distribution Integrity Management regulation.

Please include the following contact information (This data will be held privately by OPS, and used only for follow-up on your submittal):

- Name
- Company/Affiliation
- Phone Number
- Email address

Caution! The question or comment you submit may be used partially or entirely on a public website, and may also be incorporated into Frequently Asked Questions (FAQ). Do not enter personal, proprietary, or security-related details with your question!

[Submit questions or comments through this site.](#)

SUBMIT QUESTIONS AT ANY TIME @

[HTTP://PRIMIS.PHMSA.DOT.GOV/DIMP/COMMENT.HTM](http://primis.phmsa.dot.gov/dimp/comment.htm)



DIMP Regulator Contacts



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Regulator Contacts

The pipeline safety statutes provide for State regulation of intrastate pipelines and of inspection of interstate pipelines where states are certified by or enter into an agreement with DOT. Most distribution pipelines are regulated by the States under such certifications/agreements. The authority and regulatory structures may differ from state to state. OPS regional offices inspect interstate pipeline systems and intrastate facilities under direct Federal jurisdiction to determine operator compliance with pipeline safety regulations. These facilities include certain municipal and master meter gas systems that by law in some States are not subject to State regulation or intrastate pipelines in States where the state agency does not have an annual certification or agreement with PHMSA.

The State-Federal DIMP Implementation Team was created to support improvements in the integrity of the Nation's gas distribution pipeline systems through development of inspection methods and guidance for evaluation of an Operator's Distribution Integrity Management Program. Some material presented on this website was created by the team through a consensus process. States will implement the DIMP rule under their individual state statutory authority in accordance with the applicable certification under 49 U.S.C. 60105 of this title or agreement under section 60106. States may establish their own procedures, inspection forms, and guidance in implementing the DIMP rule. Since State authority and regulatory structures differ, operators should contact the regulatory authority exercising jurisdiction over their distribution pipeline for more information.

Chris McLaren, DIMP Implementation Officer
 Office of Pipeline Safety
 Pipeline and Hazardous Materials Safety Administration (PHMSA)
 U.S. Department of Transportation
 1200 New Jersey Avenue, S.E.
 East Building, 2nd Floor
 Washington, DC 20590
Chris.McLaren@dot.gov

This link is to assist you in locating your State pipeline safety agency:
<http://www.napsr.org/>

Questions and concerns regarding energy transportation pipelines can be directed to:
 U.S. Department of Transportation
 Pipeline and Hazardous Materials Safety Administration (PHMSA)
 Office of Pipeline Safety
 1200 New Jersey Avenue, S.E.
 Washington, DC 20590

Telephone: 202-366-4595
 Fax: 202-366-4566

**How to
 Contact
 Chris
 McLaren
 &
 Link to
 State
 Pipeline
 Safety
 Agencies**



FINAL DIMP INSPECTION FORMS

- 1. DIMP Inspection Form 192.1005 Operators_05.02.2011**
(All operators except master meter/small LPG)
- 2. DIMP Inspection Form 192.1015 Operators_04.11.2011**
(Master meter/small LPG operators)



Format of Inspection Forms

- Questions closely adhere to code language
- Regulatory requirements vs. information only
- “e.g.” not all inclusive, some may be applicable to an individual operator
- Divided into sections for DIMP plan, Plan Elements, Reporting, Records
- Most inspectors will use online database, same questions, different format

192.1005 What must a gas distribution operator do to implement this subpart?						
Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
1	.1005	Was the plan written and implemented per the requirement of 192.1005 by 08/02/2011? <u>OR</u> For a gas system put into service or acquired after 08/02/2011, was a plan written and implemented prior to beginning of operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



192.1005 Inspection Form

Distribution Integrity Management Program (DIMP) Inspection Form For Operators of Gas Distribution Systems For Requirements of 192.1005 – 192.1011

Version 5/2/2011

This inspection form is for the evaluation of a gas distribution integrity management program for all operators of gas distribution except operators of master meter or small liquefied petroleum gas (LPG) systems. The form contains questions related to specific regulatory requirements and questions which are strictly for informational purposes. The questions which are related to specific regulatory requirements are preceded by the rule section number which prescribes the applicable code citation for the question. The cell preceding informational questions states "information only".

S/Y stands for "Satisfactory" or "Yes", U/N stands for "Unsatisfactory" or "No", N/A stands for "Not Applicable", and N/C stands for "Not Checked". If an item is marked U/N, N/A, or N/C, an explanation must be included in the comments section.

Some inspection questions contain examples to further clarify the intent of the question. For example, question 5 asks, "Do the written procedures require the consideration of information gained from past design, operations, and maintenance (e.g. O&M activities, field surveys, One-Call system information, excavation damage, etc.)?" The list following "e.g." is not meant to be all inclusive or that all the items are required. Some of the items may not be applicable to an individual operator's system.

Some States require the operator to notify and send the State regulatory authority any changes to operator's plans and procedures. Operators in these states should also notify and send revisions of the DIMP plan to the State regulatory authority.

192.1005 What must a gas distribution operator do to implement this subpart?						
Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
1	.1005	Was the plan written and implemented per the requirement of 192.1005 by 08/02/2011? <u>OR</u> For a gas system put into service or acquired after 08/02/2011, was a plan written and implemented prior to beginning of operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
2	Information Only	Were commercially available product(s)/templates used in the development of the operator's written integrity management plan? Fully <input type="checkbox"/> Partially <input type="checkbox"/> Not at all <input type="checkbox"/> Commercial product(s)/templates name if used:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
3	Information Only	Does the operator's plan assign responsibility, including titles and positions, of those accountable for developing and implementing required actions?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
4	.1007(a)(1)	Do the written procedures identify or reference the appropriate sources used to determine the following characteristics necessary to assess the threats and risks to the integrity of the pipeline: <ul style="list-style-type: none"> Design (e.g. type of construction, inserted pipe, rehabilitated pipe method, materials, sizes, dates of installation, mains and services, etc.)? Operating Conditions (e.g. pressure, gas quality, etc.)? Operating Environmental Factors (e.g. corrosive soil conditions, frost heave, land subsidence, landslides, washouts, snow damage, external heat sources, business districts, wall-to-wall paving, population density, difficult to evacuate facilities, valve placement, etc.)? 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						



192.1015 Inspection Form

Distribution Integrity Management Program (DIMP)

Inspection Form

For Master Meter and Small LPG Operators of Gas Distribution Systems

For Requirements of 192.1015

Version 4/11/2011

This inspection form is for the evaluation of gas distribution integrity management program inspection of master meter or small liquefied petroleum gas LPG operators as defined in 192.1001. The form contains questions related to specific regulatory requirements and questions which are strictly for informational purposes. The questions related to specific regulatory requirements are preceded by the rule section number which prescribes the applicable code citation for the question. The cell preceding informational questions states "information only".

S/Y stands for "Satisfactory" or "Yes", U/N stands for "Unsatisfactory" or "No", N/A stands for "Not Applicable", and N/C stands for "Not Checked". If an item is marked U/N, N/A, or N/C, an explanation must be included in the comments section.

Some inspection questions contain examples to further clarify the intent of the question. For example, question 8 asks, "Do the written mechanisms or procedures specify the means to collect the additional information over time through normal activities conducted on the pipeline (e.g. design, construction, operations or maintenance activities)?" The list following "e.g." is not meant to be all inclusive or that all the items are required. Some of the items may not be applicable to an individual operator's system.

Some States require the operator to notify and send the State regulatory authority any changes to operator's plans and procedures. Operators in these states should also notify and send revisions of the DIMP plan to the State regulatory authority.



§ 192.1015(a) What must a master meter or small liquefied petroleum gas (LPG) operator do to implement this subpart?

Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
1	.1015(a)	Was the plan written and implemented per the requirement of 192.1015 by 08/02/2011? <u>OR</u> For a gas system put into service or acquired after 08/02/2011, was a plan written and implemented prior to beginning of operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
2	Information Only	Were commercially available product(s)/template(s) used in the development of the operator's written integrity management plan? Fully <input type="checkbox"/> Partially <input type="checkbox"/> Not at all <input type="checkbox"/> Commercial product(s)/templates name if used:				
Inspector's Comments						
3	Information Only	Does the operator's plan assign responsibility, including titles and positions, of those accountable for developing and implementing required actions?				
Inspector's Comments						



Table 1: Threat/Risk Reduction Measure/PM

Table 1: Threat Addressed, Measure to Reduce Risk, and Performance Measure

For the top five highest ranked risks from the operator's risk ranking list the following:

- Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);
- Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model#);
- Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);
- Associated performance measure.

	Primary Threat Category	Threat Subcategory, as appropriate	Measure to Reduce Risk	Performance Measure
1				
2				
3				
4				
5				

Add rows as needed (to add row, place cursor in last cell and click the "Tab" key).



June 8 DIMP Webinar Topics

- 1. Industry Perspective** – Columbia Gas of VA representing American Gas Association (AGA)
- 2. Industry Perspective** – City of Mesa, AZ representing American Public Gas Association (APGA)
- 3. Performance Data from 2010 DIMP Annual Reports**
- 4. Mechanical Fitting Failure Report Update**
- 5. DIMP Implementation Topics**
- 6. Question & Answer Session**



Thank you for your interest in Distribution Integrity Management!

DIMP Webinar:

June 8th 10:30 AM – 12:30 PM EDT

Submit your questions/comments @

<http://primis.phmsa.dot.gov/dimp/comment.htm>