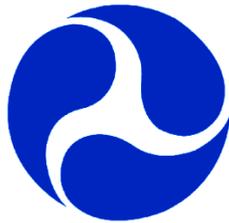


Distribution Integrity Management Program



AGA DIMP Workshop
August 13, 2008

Panel 1: Development of DIMP Plan

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PHMSA/ US DOT

NPRM Structure

- Requires risk-based written IM program including the seven elements
- Requires appropriate mitigation measures, including leak management and enhanced damage prevention
- Requires installation of EFVs
- Requirements are high-level, performance-based - Guidance needed for implementation details
- Limited requirements for Master Meter / LPG

Required Elements

Element	“Commercial” Operators	Master Meter / LPG
Written Program	Required	Simple (checklist)
Know system	Relevant factors	Location/material
Identify threats	Thorough analysis	Checklist approach
Analyze risk	Required	Not required
Mitigate risk	Required	Required
Performance Measures	7 plus threat-specific	Leaks by cause
Review/revised	Required	Required
Report Perf Measures	4 measures	Not required

Excess Flow Valves

PIPES Act 2006

- Mandatory installation of excess flow valves on new and replaced services (after June 1, 2008) on single residential user if—
 - Pressure > 10 psig throughout the year
 - Prior experience with contaminants in gas stream... not to install
 - Interference with required operation & maintenance Activities, (e.g. purging liquids through lines)... not to install
 - commercially available meeting performance standards

Mitigation

- Safety improvement will result when operators implement changes to their systems and processes
- No unique activities are foreseen; rather more and better-focused efforts like what is now done
 - Accelerated replacement of troublesome pipe (e.g., cast iron, bare steel)
 - Performing more leak surveys
 - Modifying maintenance procedures
 - Implement results of ongoing R&D
- Effective leak management and enhanced damage prevention programs are required
- Candidate “Additional and Accelerated (A/A)” Actions will be drawn from industry noteworthy practices

Leak Management

- Require process for managing leaks
 - **Locate** the leak
 - **Evaluate** its severity
 - **Act** appropriately to mitigate the leak,
 - **Kee**p records
 - **Self-assess** to determine if additional actions are necessary to keep the system safe
- Require better national data reporting & expansive analysis by operator
 - National reporting changed to focus on hazardous leaks removed & pipe materials
 - Guidance to be developed on operator-specific measures and analysis

Damage Prevention

- Preventing excavation damage is critical to reducing distribution incidents
- The rule requires that operators enhance the damage prevention programs required by 192.614
- Operators can only do so much; legislation is needed to reach other stakeholders
- Experience has shown State programs with **nine** elements are most effective

Other Requirements

- Plastic Pipe failure reporting (Panel 2)
- Prevention Through People (PTP) – Assuring Individual Performance (Panel 3)
- Allowing scheduling flexibility for requirements currently required by Part 192 (Panel 4)
- Consideration of compression coupling failures in the threat analysis (Panel 1)

Guidance – Overview

- Larger operators want choices; Smaller operators require clarity - not choices
- GPTC requested to develop guidance describing candidate approaches to implement such a regulation
- GPTC Divisions approved the Draft Guidance
It is posted for public comment
- APGA is developing a model DIMP plan (SHRIMP) for the small operators
- PHMSA developed a simple guidance for Master Meter and LPG operators- in the docket

What Will Happen Next?

- For FAQs and latest information on DIMP, please go to PHMSA website <http://phmsa.dot.gov> & click 'Pipeline Safety Community', select 'Integrity Management Program', & then select 'DIMP'
- NPRM Comment Period ends Sep 23, 2008
- GPTC Guidelines: public comment ends mid-sep.
- 'SHRIMP' available after the final rule.
- Final rule by Dec 2008