

AGA DIMP Workshop

August 2008

Chicago, IL

Effective Leak Management Program

- Leak management program to:
- Investigation.
- Classification criteria...specific and risk-based.
- Immediate repair of hazardous leaks with survey to insure hazardous leak repaired.
- Timeframes for rechecking of other leaks.
- Specific timeframe for repairs of other leaks.
- Accurate records.
- All Elements: Knowledge...Identify Threats...Evaluate and Prioritize Risk ...Identify and Implement Measures to Address Risks... Measure Performance/Monitor Results/Evaluate Effectiveness...Periodic Evaluation...Reporting

Performance Measures in 192.1007(e)

- (1)(i) Number of hazardous leaks eliminated or repaired categorized by cause. 192.1007(g) requires report to be submitted to PHMSA annually.
- (1)(v) Total number of leaks either eliminated or repaired, categorized by cause.
- (1)(vi) Number of hazardous leaks either eliminated or repaired per 192.703(c), categorized by material.
- These 2 are additional required performance measures not reported to PHMSA.
- Is 192.1009 (Plastic Pipe Failure Reports) needed with these 3 performance measures in (e)(1)(i), (v) and (vi)?

Performance Measures 192.1007(e)

- (1)(i) Number of hazardous leaks eliminated or repaired categorized by cause. 192.1007(g) requires report to be submitted to PHMSA annually.
- NEED TO DEFINE “HAZARDOUS LEAK” FOR CONSISTENT REPORTING.

Integration of Distribution Integrity Management Programs and Transmission Integrity Management Programs for Distribution System Operators (Transmission or Distribution Lines)

- For distribution system operators, the transmission lines and distribution lines are part of their “distribution system”.
- Consider integrity of the “distribution system” as a whole, not as TIMP and DIMP separately and the priorities developed together as one list.
- Need to recognize and integrate the two IM programs for distribution systems so clear “priorities” can be established.
- Regulations approach risk analysis as if each pipeline (transmission and distribution) are a discrete entity. In a “distribution system” it is not the case.
- Now that there is DIMP regulation, perhaps transmission lines in distribution systems operating less than 30% can be considered under DIMP.
- Example...Replacing casing vs. replacing CI, copper, PVC

Other Comments

- Prevention Through People...Assuring Individual Performance (192.1007(d))
 - This requirement should be removed from the rule (more later).

Other Comments

- Clarification on EFV requirements.
 - Question on “branch services”. 192.383 being removed.
 - Definition in 192.383(b) “serves a single residence”.
 - Now 192.1011 says “new or replaced service lines serving single-family residences”.
 - I don’t believe the intent of the regulation has changed, but it needs clarification.
 - Also, “entirely replaced” changes the definition of when an EFV should be installed.
 - Had to be notified when the operator had an opportunity to install a valve. Now does the “entire” service line have to be replaced?

Other Comments

- MM and LPG systems should have simple checklist.
- Small operators need the simple program.
 - Questions

Other Comments

- New Construction and Replacements Not Covered in DIMP
 - One of the most important aspects of the integrity of any system, including distribution systems, is how well it is originally built/constructed/installed.
 - If the installation is not done correctly, there will be integrity issues that will have to be dealt with throughout the life of the facility.
 - “Integrity” of a system begins with the “quality” of the installation. DIMP is a huge rule to manage the integrity of existing distribution systems, but is silent on insuring the integrity of the quality of new installations, which will greatly effect/affect the integrity management requirements of the system in years to come.
 - Believe there should be consideration of inspection requirements for contractors to assure the integrity of new pipelines being installed so as not to be installing pipelines today that will create integrity issues in the future.