

Alternative Inspection Intervals

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Inspection Intervals – Current State

- ◆ Current Federal and (where applicable) State Codes
 - ◆ Continue according to existing requirements
 - ◆ Simple, stable, familiar
- ◆ Federal and/or State Rulemakings
 - ◆ Time consuming, many procedural steps
 - ◆ Can be reactive, or can entrench technologies
 - ◆ Rather unusual for operators to promote rulemaking
- ◆ Waivers
 - ◆ Often time consuming, many procedural steps
 - ◆ May not be appropriate to other parties

***Alternative* Inspection Intervals - Possibilities**

- ◆ DIMP Proposal (192.1017)
 - ◆ Allows for interval reductions that are engineered, data-driven and risk-based provided they do not significantly increase risk
 - ◆ Implies PHMSA oversight of States' review, approval, stipulations and effectiveness monitoring

Service Line Atmospheric Corrosion – An Early DIMP-ish Example

- ◆ Existing regs are calendar driven
- ◆ NACE standards imply that AC is a slow process
- ◆ Operators & NAPSR reps created a data collection form
- ◆ Data has been collected & analysis is underway
- ◆ Analysis may point to different risk levels on service piping that is inside/outside, HP/LP, coastal/desert, etc.
- ◆ Segregating asset classes and treating them differently may promote more efficient risk management
- ◆ If the case is made, *what comes next?*

Practical Matters –

How Does One Establish an Alternative Interval under DIMP?

- ◆ Determine whether data justifies a change
- ◆ Specify the change requested
- ◆ Establish appropriate metrics
- ◆ Request the change – and then what?
 - ◆ If there are no State rules, is this followed by a State notification to PHMSA?
 - ◆ If there are State rules and/or rules of procedure does the Federal rule enable the State to act outside any such rules?
 - ◆ How is this process distinct from the waiver process?
 - ◆ How is information shared to ensure understanding of similarities & differences across operators?