

## **Distribution Integrity Management Program (DIMP)**

### **Inspection Form**

## **For Master Meter and Small LPG Operators of Gas Distribution Systems**

### **For Requirements of 192.1015**

Version 9/23/2011

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.

**Operator Information:**

Name of Operator (legal entity):	
PHMSA Operator ID(s) Included in this Inspection:	
Type of Operator:	<input type="checkbox"/> Master Meter <input type="checkbox"/> Small LPG
States(s) included in this inspection:	
Headquarters Address:	
Company Contact:	
Phone Number:	
Email:	
Date(s) of Inspection:	3T TO 3T
Date of Report:	3T

**Persons Interviewed:**

Persons Interviewed <i>(List the DIMP Administrator as the first contact)</i>	Title	Phone Number	Email

**State or Federal Representatives:**

Inspector Name	Agency	Phone Number	Email

**Inspector Comments (optional):**

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**§ 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)	<p>Was the plan written and implemented per the requirement of 192.1015 by 08/02/2011?</p> <p><u>OR</u></p> <p>For a gas system put into service or acquired after 08/02/2011, was a plan written and implemented prior to beginning of operation?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
2	Information Only	<p>Were commercially available product(s)/template(s) used in the development of the operator's written integrity management plan?</p> <p>Fully <input type="checkbox"/> Partially <input type="checkbox"/> Not at all <input type="checkbox"/></p> <p>Commercial product(s)/templates name if used:</p>				
Inspector's Comments						
3	Information Only	<p>Does the operator's plan assign responsibility, including titles and positions, of those accountable for developing and implementing required actions?</p>				
Inspector's Comments						

### 192.1015(b)(1) Knowledge

Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
4	.1015(b)(1)	Does the plan include a written explanation of the mechanisms or procedures to address how the operator will demonstrate knowledge of its pipeline which, to the extent known, should include the approximate location and material of its pipeline?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
5	Information Only	Do the written mechanisms or procedures indicate if the information was obtained from electronic records, paper records, or subject matter expert knowledge (select all which apply)?				
		Electronic <input type="checkbox"/>	Paper <input type="checkbox"/>	SME <input type="checkbox"/>		
Inspector's Comments						
6	.1015(b)(1)	Does the plan include a written explanation of the mechanisms or procedures to identify additional information that is needed to fill gaps due to missing, inaccurate, or incomplete records?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
7	.1015(b)(1)	Does the plan list the additional information needed to fill gaps due to missing, inaccurate, or incomplete records?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
8	.1015(b)(1)	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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
9	.1015(c)(3)	Do the written mechanisms or procedures require the capture and retention of data on any new pipeline installed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
10	.1015(c)(3)	Does the captured and retained data on any new pipeline include, at a minimum, the location where the new pipeline is installed and the material from which it is constructed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
11	.1015(b)(1)	Has the operator demonstrated an understanding of its pipelines, which, to the extent known, should include the approximate location and material of its pipelines?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						

### 192.1015 (b)(2) Identify Threats

Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
12	.1015(b)(2)	In identifying threats, do the written mechanisms or procedures include consideration of the following categories of threats to each gas distribution pipeline? <ul style="list-style-type: none"> <li>• Corrosion</li> <li>• Natural Forces</li> <li>• Excavation Damage</li> <li>• Other Outside Force Damage</li> <li>• Material or Weld Failure</li> <li>• Equipment Failure</li> <li>• Incorrect Operation</li> </ul>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Inspector's Comments						
13	.1015(b)(2)	Did the operator consider the information that was reasonably available to identify existing and potential threats?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
14	.1015(b)(2)	Does the documentation provided by the operator demonstrate implementation of the element "Identify Threats"?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						

### 192.1015(b)(3) Rank Risks

Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
15	Information Only	Was the risk evaluation developed fully or in part using a commercially available tool? <div style="display: flex; justify-content: space-around; margin-top: 5px;"> <span>Fully <input type="checkbox"/></span> <span>Partially <input type="checkbox"/></span> <span>Not at all <input type="checkbox"/></span> </div> Commercial tool name if used:				
Inspector's Comments						
16	.1015(b)(3)	Do the written mechanisms or procedures contain the method used to determine the relative importance of each threat and estimate and rank the risks posed?  Briefly describe the method.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
17	.1015(b)(3)	Did the operator validate the results generated by the risk evaluation model/method?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
18	.1015(b)(3)	Does the documentation provided by the operator demonstrate implementation of the element "Evaluate and Rank Risk"?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						

**192.1015 (b)(4) Identify and implement measures to mitigate risks**

Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
19	.1015(b)(4)	Do the written mechanisms or procedures identify when measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
20	.1015(b)(4)	When measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk, does the plan identify the measures selected, how they will be implemented, and the risks they are addressing?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
21	1015(b)(4)	Complete the table at the end of this form: <i>Threat Addressed, Measure to Reduce Risk, and Performance Measure</i>				
Inspector's Comments						
22	.1015(b)(4)	Does the documentation provided by the operator demonstrate implementation of those measures to reduce risk required by Part 192 Subpart P?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						

**192.1015 (b)(5) Measure performance, monitor results, and evaluate effectiveness**

No.	Rule §192	Description	S/Y	U/ N	N/A	N/C
23	.1015(b)(5)	Does the plan contain written mechanisms or procedures for how the operator monitors the performance measure “number of leaks eliminated or repaired on its pipeline and their causes”?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector’s Comments						
24	.1015(b)(5)	Did the operator monitor the performance measure “number of leaks eliminated or repaired on its pipeline and their causes”?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector’s Comments						

**192.1015(b)(6) Periodic Evaluation and Improvement**

Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
25	.1015(b)(6)	Do the written mechanisms or procedures provide for determination of the appropriate period for conducting IM program evaluations based on the complexity of its pipeline and changes in factors affecting the risk of failure, not to exceed 5 years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
26	.1015(b)(6)	Do the written mechanisms or procedures consider the results of the performance monitoring in the periodic IM program evaluation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
27	Information Only	Do the written mechanisms or procedures contain a process for informing the appropriate operating personnel of an update to the plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
28	Information Only	Do the written mechanisms or procedures contain a process for informing the appropriate regulatory agency of a significant update to the plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
29	.1015(b)(6)	Does the documentation provided by the operator demonstrate implementation of the element "Periodic Evaluation and Improvement"?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

**192.1015 (c) What records must an operator keep?**

Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
		For questions 30-32:  Does the operator have written mechanisms or procedures specifying the following records demonstrating compliance with Subpart P will be maintained for at least 10 years:				
30	.1015(c)(1)	A written IM plan in accordance with 192.1015, including superseded IM plans?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
31	.1015(c)(2)	Documents to support threat identification?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
32	.1015(c)(3)	Documentation showing the location and material of all pipe and appurtenances that are installed after the effective date of the operator's IM program and, to the extent known, the location and material of all pipe and appurtenances that were existing on the effective date of the operator's program?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
33	.1015(c)(3)	Has the operator maintained the required records?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						

**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				

Other Inspector Comments	
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