



DIMP IMPLEMENTATION



National Association of Pipeline Safety Representatives

US DOT PHMSA Office of Pipeline Safety



Topics for Today

- Mechanical Fitting Failure Report Data/Analysis
- DIMP Inspection Forms
- DIMP Website and Performance Measures Reporting
- Initial Inspection Results and Findings



MFFR Data Analysis

- Data from the reporting period from January 1, 2011 through January 2, 2012.
- Total 1150 reports submitted through January 2, 2012



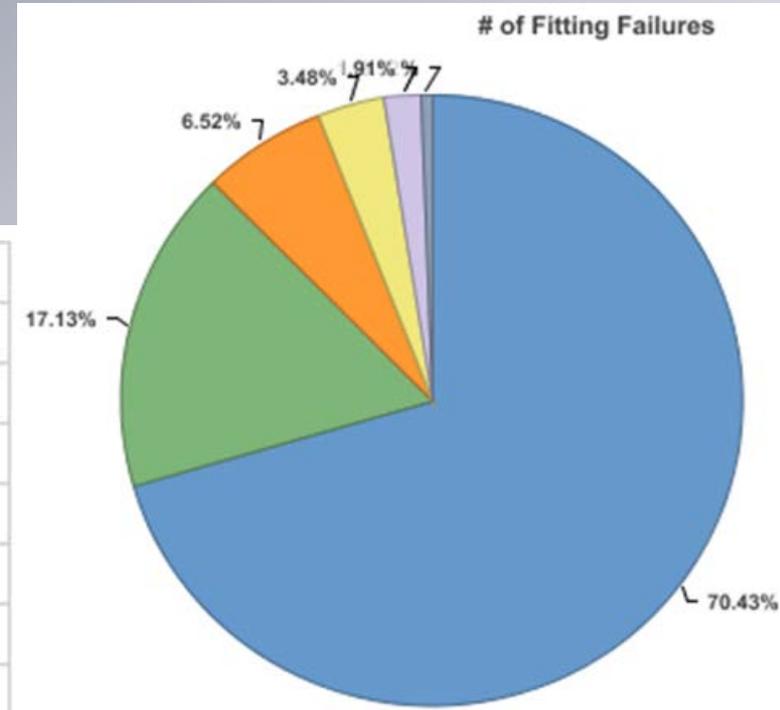
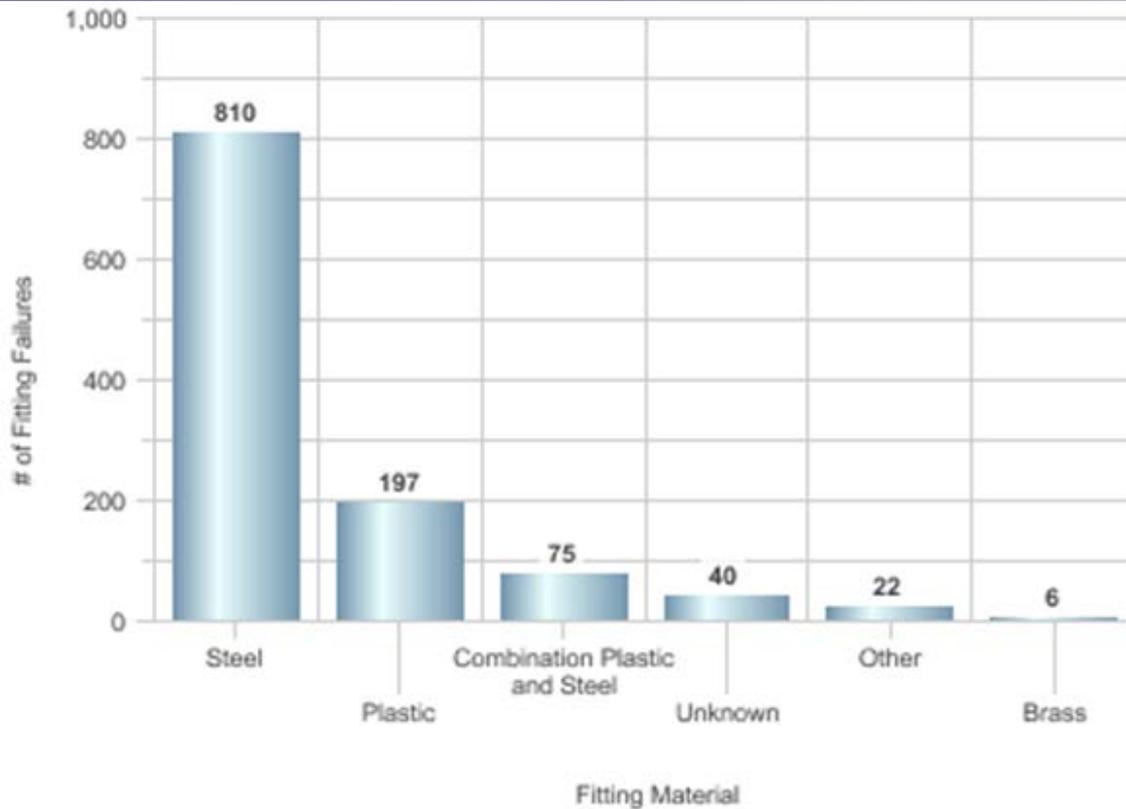
INSTRUCTIONS FOR COMPLETING FORM PHMSA F 7100.1-2

- Make an entry in each block for which data are available. Some companies may have very old pipe for which installation records do not exist. Estimate data if necessary. ***Avoid entering "Unknown" if possible.***



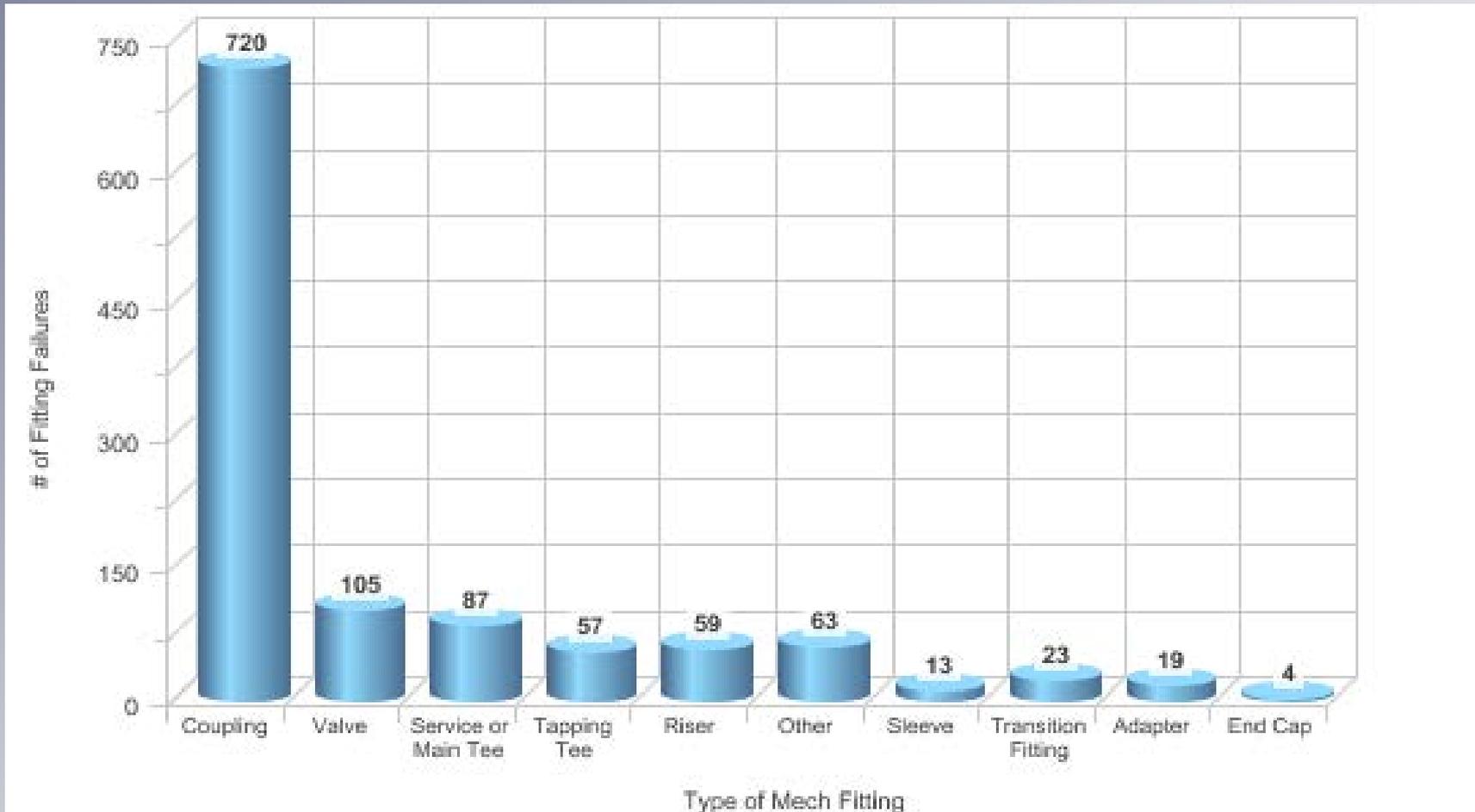
Mechanical Fitting Failures by Material

as of 1/2/2012





Mechanical Fitting Failure by Type of Mechanical Fitting as of 1/2/2012





Specify the Mechanical Fitting Involved



Stab Type



Nut Follower



Bolt Type

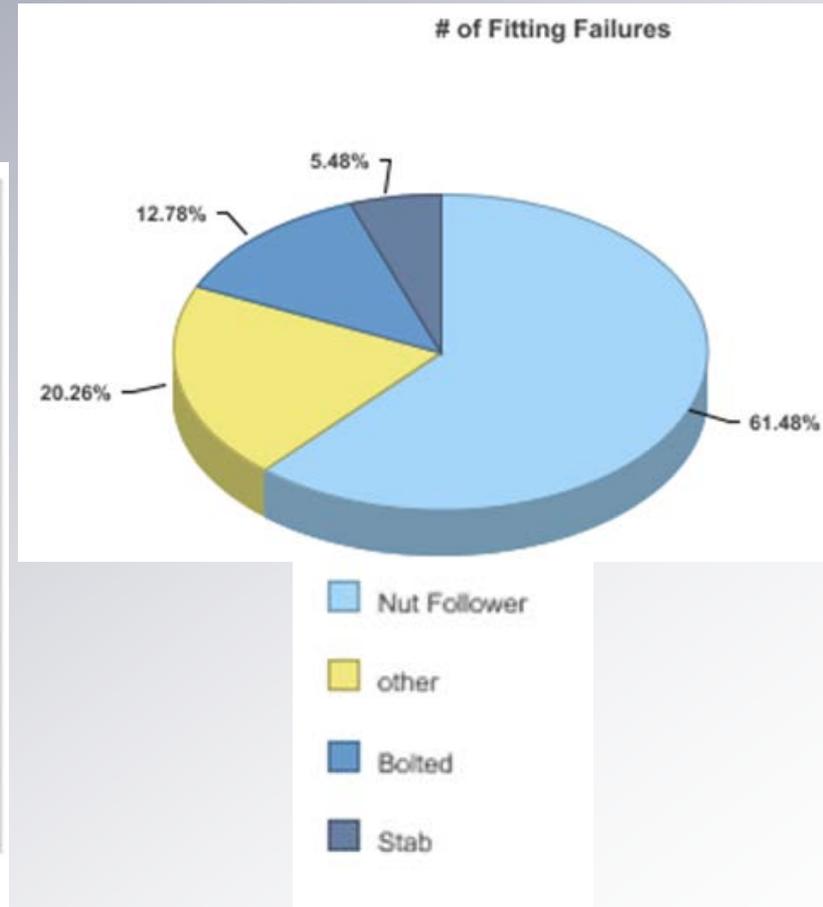
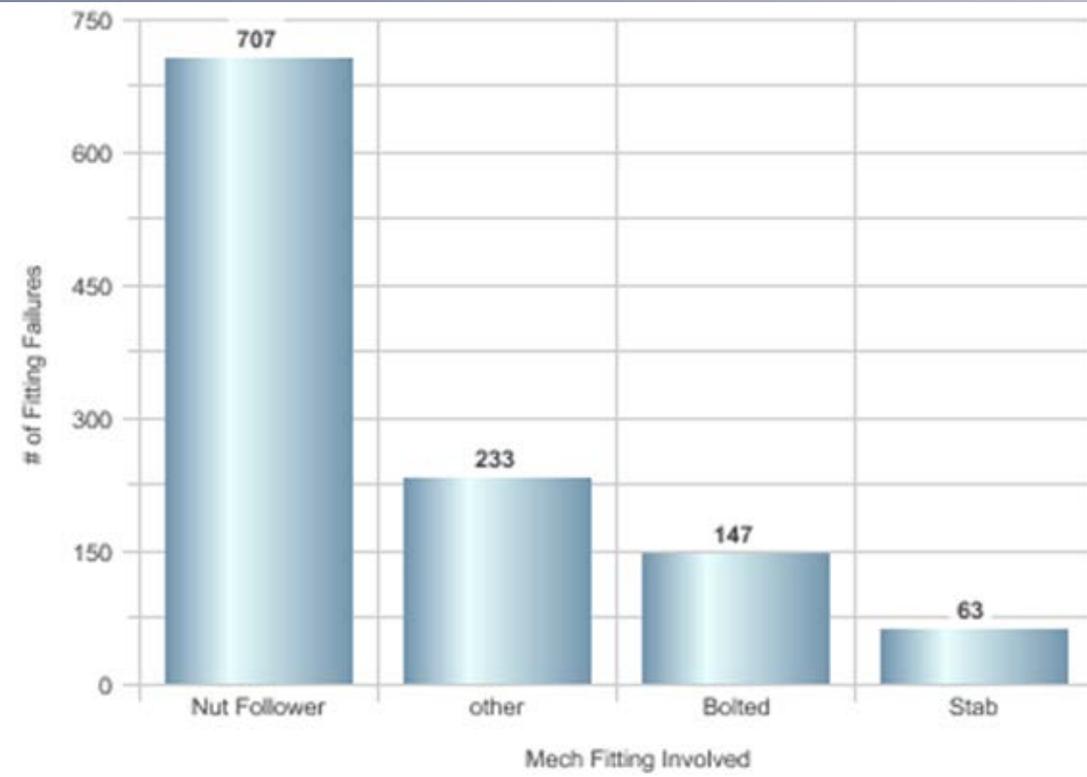


Other(s)





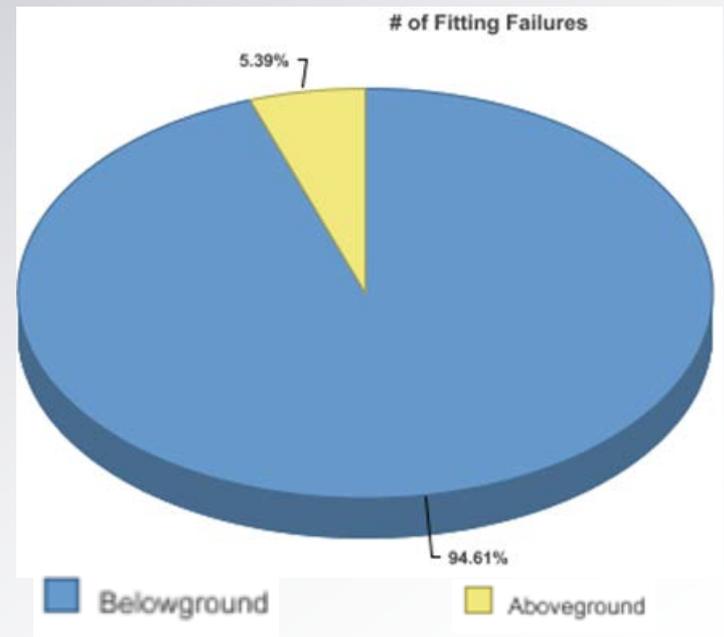
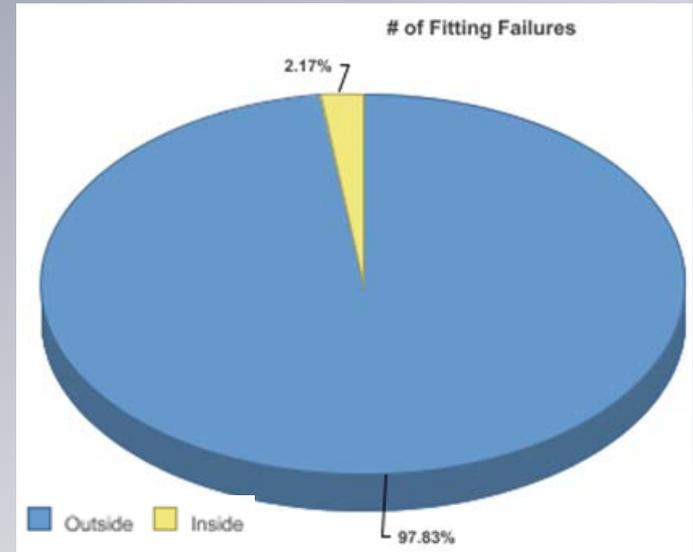
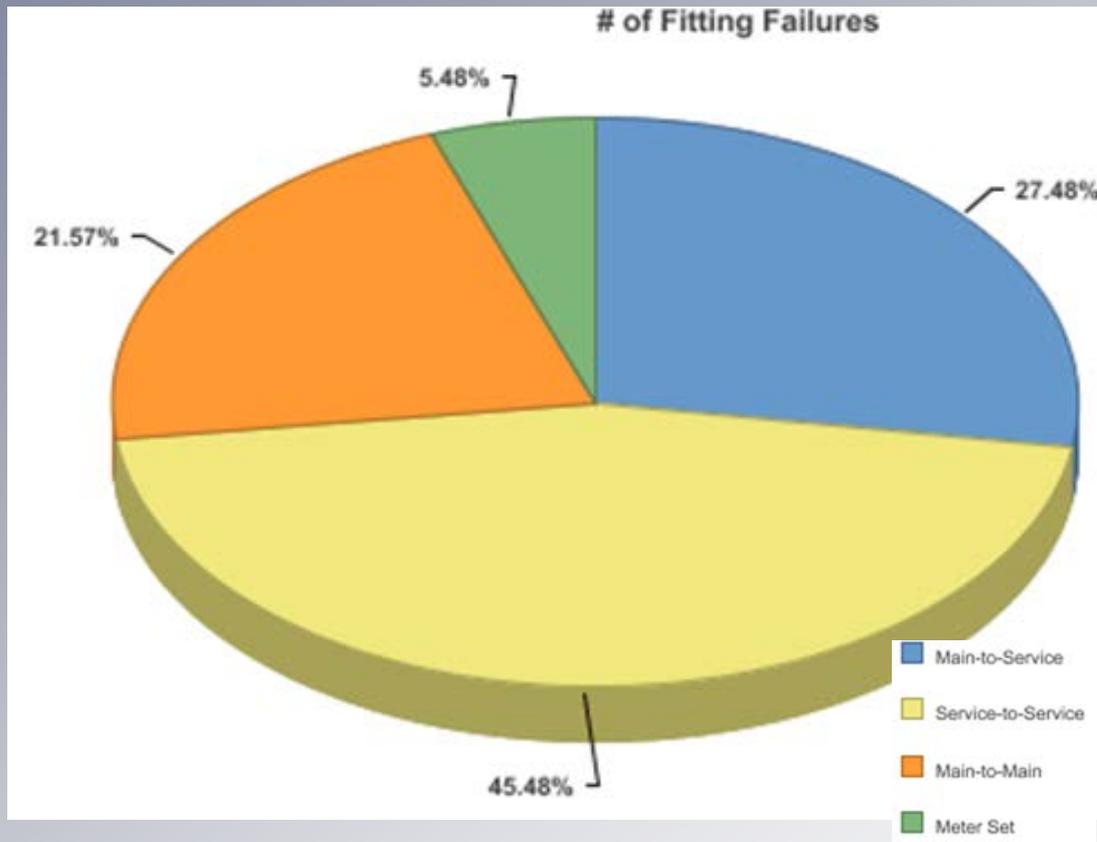
Mechanical Fitting Failures by Type as of 1/2/2012





Mechanical Fitting Failures by Location in System

as of 1/2/2012





MFFR Data Analysis (continued)

- Following the receipt of all 2011 reports (by March 15th), the MFFR Team will QA/QC the data and initiate analysis.
- Preliminary analysis of the data should be completed and posted in or about May 2012.
- Results of the MFFR data analyses will be a topic at the June 27th DIMP Workshop to be held in the DFW area.



Mechanical Fitting Failures

Reporting and Data Analysis

- Communication of Performance Data through DIMP web page in a manner similar to Liquid and Gas IM. 2011 Annual report IM Performance Data will be posted along with 2011 MFFR data (first year) in or about May, 2012.
- There has been some Industry confusion over which failures to report. The MFFR instructions have been revised to better communicate that Operators are to report all failures of mechanical fittings and compression type couplings, regardless of material, that result in a hazardous leak.
- Failures resulting from a construction or installation defect should be identified with the "Incorrect Operations" leak cause and not the "Material or Welds/Fusions" leak cause category (as is described in PHMSA F 7100.1-2 and the Instructions).



DIMP Inspection Forms



DIMP Inspection Forms

- PHMSA DIMP Inspection Forms for 192.1005 and 192.1015 distribution operators are available at <http://primis.phmsa.dot.gov/dimp/resources.htm>
- Revisions were implemented in September, 2011 that made the forms more user friendly for Inspectors. No changes were made to the wording of the questions.



Draft Record and Field Audit Form

- Draft developed per NAPS Board request – In Review
- Intended for inspections after initial DIMP inspections

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
1	192.1007(a) .1007 (a)	Does the operator have records demonstrating a reasonable understanding of its system (e.g., pipe location, size, dates of installation, materials, operating conditions, operating environment)? List deficiencies below:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
2	.1007 (a)(3)	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 Comments						
3	.1007 (a)	Is the operator making reasonable progress in filling identified knowledge gaps using	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						



DIMP Website and Posting of DIMP Performance Measures



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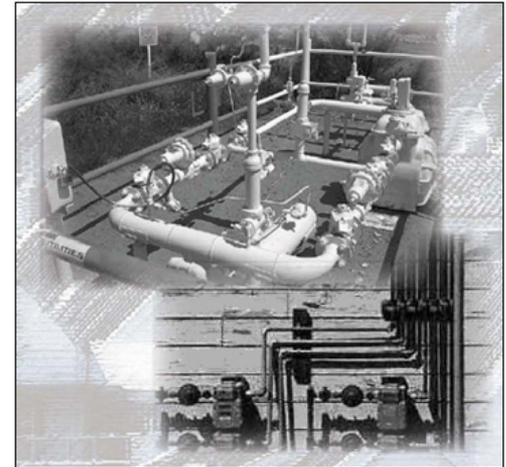


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Distribution Integrity Management

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, and State Seminars

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

- State-Federal DIMP Implementation Team Webinar, May 10, 2011 from 10:30 AM to 12:30 PM EDT Members of the State and Federal Distribution Integrity Management Program Implementation Team recently completed a series of pilot inspections of gas distribution operators' distribution integrity management programs. The team will sponsor two separate and distinct two-hour webinars. Between the two webinars, the topics presented should include: the Team's findings and general observations from the pilot inspections; regulators' expectations of operators in implementing their plan; 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.

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.dot.gov/dimp/comment.htm>. Questions can 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://opsweb.phmsa.dot.gov/webinars>. Upon registration, the LiveMeeting information will be distributed. Due to the limited capacity, we encourage and request that parties at the same location share a LiveMeeting link. The Webinars will use 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 Chris McLaren by e-mail at Chris.McLaren@dot.gov or by phone at 281-216-4455. For the preliminary agenda, [click here](#).
- 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 Management Program Implementation Team recently completed a series of pilot inspections of gas distribution operators' distribution integrity management programs. The team will sponsor two separate and distinct two-hour webinars. Between the two webinars, the topics presented should include: the Team's findings and general observations from the pilot inspections; regulators' expectations of operators in implementing their plan; the DIMP inspection forms; and a question and answer session.

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

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

- [APGA Operations Conference Pensacola, FL, April 8, 2011](#)
- [CGA Excavation Safety Conference & Expo, March 8, 2011](#)
- [Gas Distribution Annual Report and Mechanical Fitting Failure Webinar \(2011\)](#)
- [PHMSA DIMP Webcast, August 2010](#)
- [AGA Public Meeting, Distribution Integrity Management, Chicago, Illinois, August 13, 2008](#)
- [PHMSA DIMP Webcast, April 2008 \(replaced with 2010 Webcast\)](#)

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



DIMP History

1. DIMP FR Notices
2. Future "History of DIMP"



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Webcast

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 collection, OMB Control Number 2137-0522 \(2009\)](#)
- [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 \(Issued 1986, Updated 2008\)](#)
- [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\(2005\)](#)
- [Safety Performance and Integrity of the Natural Gas Distribution Infrastructure, American Gas Foundation \(AGF\) Study\(2004\)](#)
- [Department of Transportation \(DOT\) Investigator General \(IG\) Report; Actions Taken and Needed for Improving Pipeline Safety \(2004\)](#)



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 pipeline systems through development of inspection methods and guidance for evaluation of an Operator's Distribution Integrity Management Program. The Team developed inspection forms for evaluation of an Operator's Distribution Integrity Management Program. States will implement the DIMP rule under their individual state statutory authority. Since State authority and regulatory structures differ, operators should contact the regulatory authority exercising jurisdiction over their distribution pipelines 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 safety inspectors evaluating operators' distribution integrity management (DIMP) programs.

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

Distribution Integrity Management: Guidance for Master Meter and Small Liquefied Petroleum Gas Pipeline Operators
This document provides guidance to help master meter operators and small LPG operators (i.e., those serving fewer than 100 customers from a single source) implement the requirements of subpart P of Part 192. Operators of larger distribution pipelines should refer to the Gas Piping Technology Committee (GPTC) guidelines. [[Guidance on Carrying Out Requirements in the Gas Distribution Integrity Management Rule \(2009\)](#)]

Gas Piping Technology Committee (GPTC) Guide Material Appendix G-192-8 Distribution Management Integrity Program
The Guide material provides guidance to operators for developing a Distribution Integrity Management Program and compliance with proposed Federal Regulations §§192.1005, 192.1007 and 192.1015 on DIMP. It provides operators with practices that may be considered as they develop and maintain a DIMP specific to their gas distribution systems. The American Gas Association (AGA) serves as the secretariat to the Accredited Standards Committee (ASC) Z380, Gas Piping Technology Committee. The GPTC develops and publishes ANSI Z380.1, Guide for Gas Transmission and Distribution Piping Systems. The DIMP guidelines may be purchased separately from the entire Guide.
More information can be found at <http://www.aga.org/Committees/gotocommitteepages/gaspiping/>.

SHRIMP - Simple Handy Rule based Integrity Management Plan
A Distribution Integrity Management Programs (DIMP) plan development tool (SHRIMP) developed by the APGA Security and Integrity Foundation (SIF). While SIF receives funding from PHMSA through a cooperative agreement, the American Public Gas Association (APGA) provides support for the material. All questions pertaining to SHRIMP should be directed to the APGA SIF at www.apgasif.org.

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

- American Gas Association (AGA)
- American Public Gas Association (APGA)
- Midwest ENERGY Association (MEA)

1. DIMP Inspection Forms
2. Technical Reports
3. DIMP Guide for Master Meter/Small LPG

4. SHRIMP
5. GPTC
6. Associations
7. CGA
8. PPDC

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



DIMP FAQs



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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 unpressurized residential service lines.



DIMP Performance Measures

Integrity Management Performance Measures for Operators of Gas Distribution Pipelines in the United States

Performance Measure Reporting and Quick Facts

Protecting America's Gas Distribution Pipelines

Gas distribution pipeline operators are required to submit annually performance measure reports on their Integrity Management (IM) programs and on their pipeline infrastructure. PHMSA and State Pipeline Safety Programs use these reports – due on March 15 for the previous calendar year – to monitor and report on industry progress in meeting the requirements of the Distribution IM Rule (which took effect in August of 2011), and to respond to inquiries about both PHMSA's and individual State's oversight programs.

The Distribution IM performance measure reports have only been required beginning in 2010, and these measures provide key information pertaining to operators' IM programs, including the total number of leaks either eliminated or repaired by cause, the number of hazardous leaks eliminated or repaired by cause, the number of excavation damages, and the number of excavation tickets (based on One-Call notifications).

For a basic overview of the progress being made under the Distribution IM Rule, please refer to the Quick Facts below.

Quick Facts on Performance Measures for Distribution Integrity Management

The table below, entitled "Summary of Gas Distribution Pipeline Performance", depicts the new Distribution IM data collected beginning in 2010 along with the historical leak data collected since 2005. The historical data consists of the total number of leaks which were repaired or otherwise eliminated, whereas the new Distribution IM data being collected includes this same leak count while also breaking out separately those leaks defined as hazardous.

[Summary of Gas Distribution Pipeline Performance](#)

Time run: 2/29/2012 6:14:24 AM



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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.

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 Pipeline and Hazardous Materials Safety Administration (PHMSA)
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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



DIMP Enforcement Guidance

- DIMP Enforcement Guidance is being drafted.
- When completed, this guidance will be made publicly available and posted on PHMSA's website with the other Enforcement Guidance documents currently posted at <http://www.phmsa.dot.gov/foia/e-reading-room>
- This posting will allow Operators to understand Regulators' expectations with regards to the DIMP Regulation



DIMP Public Meeting

- **NAPSR/PHMSA DIMP Public Meeting on June 27, 2012**
 - Location - DFW / Webcast for those who cannot attend
 - Presentations will discuss:
 - Expectations of implemented DIMP programs
 - Current versions of DIMP inspection forms
 - Observations from DIMP Inspections conducted
 - MFFR Data Results from 1st year (2011)
 - Methodologies that Industry is employing
 - Discussion of areas of concern and current topics
 - Opportunity for Q&A



Initial DIMP Inspection Results and Findings



DIMP Inspections

- Plan development and implementation were required to be complete on August 2, 2011.
- State Programs and PHMSA have been conducting DIMP inspections since the implementation date of the Rule.
- Today's presentation will include some of the key findings from the inspections conducted to date and discussion of the expectations of regulators on these findings.



DIMP Rule Provisions

- IM Plan and Models used to develop IM Plan
- Knowledge of gas distribution system
- Identify threats that could threaten the integrity of pipeline
- Evaluate and rank risk associated with distribution pipelines
- Identify and implement measures to address risks
- Measure performance, monitor results, and evaluate effectiveness of IM program
- Periodic Evaluation and Improvement of IM Program
- Report results of required performance measures
- Records maintained to demonstrate compliance



IM Plans and Development Models

- When a “Model” Program is used, documentation of how the “Model” Program works must be integrated or referenced.
- An Operator’s Operations, Maintenance, and Inspection procedures may need to be integrated or referenced in the DIMP depending on program’s structure.
- Procedures are required in 192.1007, and plans must contain adequate procedural documentation.
- Procedure means a fixed, step-by-step sequence of activities or course of action (with definite start and end points) that must be followed in the same order to correctly perform a task.
- **Plans should be state specific to allow for review of required DIMP elements on a state-by-state basis.**



Knowledge of Gas Distribution System

- Where DIMP relies upon subject matter expert (SME) input, the operator must be able to demonstrate why the SME is an expert.
- SME decisions and conclusions must be documented.
- Operators need to specify how field information is to be relayed into DIMP. Some Operators have modified field data acquisition forms and internal processes to incorporate new information and correct inaccurate information.
- Plan needs to reference the missing information list when it resides outside of the DIMP.
- Procedures for identification and collection of additional information must be included or referenced in DIMP to ensure consistent collection and processing.



Knowledge (continued)

- Specific source data and documents used in development and implementation of DIMP must be included in DIMP.
- Procedure for collection of additional or missing information must be documented; and if there is no missing or unknown information, the DIMP must state this assumption.
- Plan must list data that the Operator has identified that is needed to fill gaps.
- Plan must include procedure for recording new pipe data, including location and materials used.
- Plan must include procedures to evaluate and obtain data from external sources that are reasonably available to identify existing and potential threats.



Identify Threats to Integrity

- A DIMP must provide adequate details or specificity to address specific threats and risks in the Operator's unique operating environment.
- Consideration must be given to applicable operating and environmental factors affecting consequence (e.g., paved areas, business districts, hard to evacuate) relating to the Consequence of Failure (COF) when evaluating risk.
- DIMP procedures must provide for the re-evaluation of threats and the identification of new or potential treats.
- DIMP must address the threat of excavation damage to pipelines.



Evaluate and Rank Risks

- System subdivision for the evaluation and ranking of risks must be sufficient to appropriately analyze risk(s) present in the Operator's unique operating environment.
- Geographical segmentation may be appropriate when systems are separated by space or a specific, predominate threat exists (e.g., where flooding can be expected, earthquake prone area). However, different materials may be a predominate threat in a region, and segmentation may need to be refined to accommodate different failure rates.
- Operators must consider non-leak failures in analyzing risk. DIMP should address failures that do not result in a release (e.g., near miss) to identify potential threats.
- Risk ranking must include all risks to pipeline facilities.



Evaluate and Rank Risks (cont.)

- The risk ranking model results must be validated. One operator identified that the “COF” can be diluted by Frequency of Failure (“FOF”) – a larger range for consequences was needed to get reasonable results.
- Plan must provide explanation of the process used to validate the data used in the risk ranking and to review the output of the risk ranking model for “reasonableness”.
- The Plan must provide for the incorporation of pipe replacement program in the DIMP as the risk results will be affected by the removal of vintage pipeline facilities.
- The Plan (or Model used) must address risks specific to services as well as mains.
- When changes are made to a risk model, the risk ranking should be re-run and results incorporated into DIMP promptly.



Measures to Address Risks

- The Plan must provide for a link between the specific risk (either a threat or consequence) and the measure to reduce risk that has been identified and implemented.
- The Plan must contain or reference an effective leak management plan unless all leaks are repaired when found.
- If an Operator repairs all leaks when found, that must be stated or referenced in the DIMP.
- Intervals must be established for the re-evaluation of implemented measures to reduce risks to gauge their effectiveness and identify if the measure is appropriate.
- DIMP Models must rank proposed projects/replacements based on risk and not the cost-effectiveness.



Performance Measurement

- Operators must develop and monitor performance measures from an established baseline to evaluate the effectiveness of its IM program.
- A DIMP must include procedures for establishing baselines for Performance Measures required in 192.1007(e)
- Some Operator's Plans identified "triggers" to initiate development of new performance measures depending on the program performance and the operating environment
- When measures are implemented to reduce risk, performance measures must be established to monitor their effectiveness
- Operators have identified a single performance measure to evaluate the effectiveness of multiple risk control measures



Periodic Evaluation and Improvement

- A Plan must contain procedures for conducting periodic evaluations.
- If it is found necessary to make changes to the periodic evaluation procedure when an Operator implements this element in the future, the changes would be handled with revisions to the original procedure.
- Plan must include mechanisms or procedures that provide for notifying certain operator personnel of changes and improvements made to the plan or plan requirements when they are affected by the change.



Report Results

- The DIMP must include (or reference) procedure(s) describing the collection and reporting of Annual Report data as part of the annual report to PHMSA.
- If a State agency exercises jurisdiction over the Operator's pipeline and requires reporting, a procedure must include instruction to send reporting information to the state pipeline safety authority.



Records Required to be Maintained

- **An operator must maintain records demonstrating compliance with the requirements of this subpart for at least 10 years.** The Plan must describe how superseded plans and data will be maintained and kept secure
- Plans must include an adequate revision log. An revision log would contain the Plan effective date, revision dates, and description of any changes in that revision
- Some Plans included statements in DIMP that “all Company records were used in the development of the DIMP” – specificity is appropriate as only those records used to develop and implement the DIMP should be referenced as being records required to be maintained for 10 years.



Questions and Answers