



DIMP IMPLEMENTATION



National Association of Pipeline Safety Representatives

US DOT PHMSA Office of Pipeline Safety

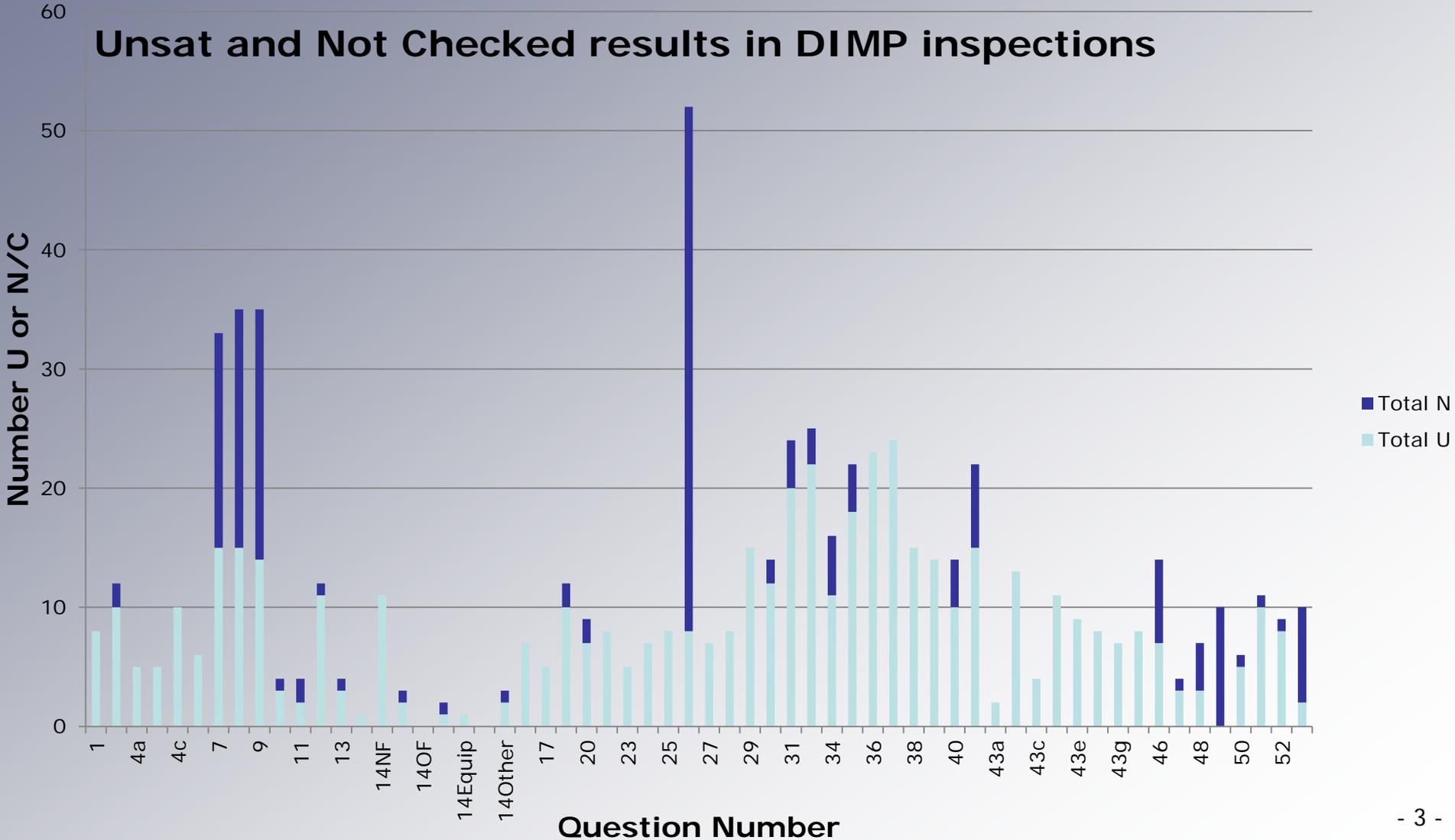


DIMP Inspection Results and Findings



Inspection Findings

Unsat and Not Checked results in DIMP inspections





IM Plans and Development Models

192.1005



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.
- Multi-state operators may have one or more plans but must be able to “filter” their risk ranking and measures to reduce risk by state.



Other DIMP Plan Comments

- Pre-DIMP risk reduction measures need to be incorporated into the DIMP plan.
- If risk evaluation concludes new or additional risk reduction measures are not needed to address a particular threat, that is acceptable but needs to be explained in the Plan.
- The DIMP rules may require something that is already being done in another context – copy it over or link to it.
- The Plan should culminate in a ranked/prioritized list of threats, risk reduction measures, and performance measures.
- Treat DIMP as a tool to analyze needs and progress, not as a regulatory exercise.



Knowledge of Gas Distribution System

192.1007(a)



Knowledge of Gas Distribution System

- Operator must demonstrate why and SME is and SME.
- SME decisions and conclusions must be documented.
- Operators must specify how field information is to be relayed into DIMP.
- Plan must 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. It may be necessary to modify field data acquisition forms and internal processes to incorporate new information and correct inaccurate information.



Knowledge (continued)

- Data quality is a common concern;
 - Outdated, incomplete, obvious errors.
 - Outdated data systems difficult to use or sort.
 - Data cleanup and scrubbing is often required.
- Reasonable balance between SME and hard data is important.
- Integration of data to identify existing and potential threats requires an appropriate level of resource allocation.
- When scrubbed data becomes available threat identification may need to be re-run.



Identify Threats to Integrity

192.1007(b)



Identify Threats to Integrity

- Must 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.
- Plan must include procedures to evaluate and obtain data from external sources that are reasonably available to identify existing and potential threats.



Threat Identification

- Threat categories
 - Time Dependent
 - Time Independent
- Threat Identification, Data Gathering, Data Integration, and Risk Assessment are inter-related and dependent upon each other
- A failure of one of these processes can result in threats to the integrity of the pipeline not being addressed
- Threats are Potential Pipeline Failure Mechanisms or Pipeline Failure Cause Categories
- Identifying Threats is key to Operator Integrity Decisions regarding measures to implement to reduce risk(s).



Incident Causes or Threats to the Integrity of a Pipeline from B31.8S

- Third Party Damage
 - Third party inflicted damage (instantaneous/immediate fail)
 - Previously damaged pipe (delayed failure mode)
 - Vandalism
- Corrosion Related
 - External
 - Internal
- Miscellaneous Equipment and Pipe
 - Gasket O-ring failure
 - Stripped threads/broken pipe/coupling fail
- Control/Relief equipment malfunction
 - Seal/pump packing failure
 - Wrinkle bend or buckle
 - Miscellaneous
- Incorrect Operations
 - Incorrect operation company procedure
- Weather Related
 - Cold weather
 - Lightning
 - Heavy rain or floods
 - Unknown
- Manufacturing Related Defects
 - Defect pipe seam
 - Defective pipe
- Welding/Fabrication Related
 - Defective pipe girth weld
 - Defective fabrication weld
- Outside Forces
 - Earth movement
- Environmental Cracking
 - Stress corrosion cracking



Threat Categories from GPTC G-192-8

- External Corrosion
 - Bare Steel Pipe (CP or no CP)
 - cast iron pipe (graphitization)
 - coated and wrapped steel pipe (CP or no CP)
 - Other metallic materials
- Internal corrosion
- Natural Forces
 - Outside force/weather: steel pipe
 - Outside force/weather: plastic pipe
 - Outside force/weather: cast iron pipe
- Excavation Damage
 - Operator (or its contractor)
 - Third-party
- Other Outside Force Damage
 - Vehicular
 - Vandalism
 - Fire/Explosion (primary)
 - Leakage (previous damage)
 - Blasting
 - Mechanical damage: Steel pipe, Plastic pipe, Pipe components



Threat Categories from GPTC G-192-8 (Continued)

- Material or Weld
 - Manufacturing defects
 - Materials/Plastic
 - Weld/Joint
- Equipment Failure
 - System Equipment
- Incorrect operation
 - Inadequate procedures
 - Inadequate safety practices
 - Failure to follow procedures
 - Construction/Workmanship defects
- Other Failure Causes that the Operator has experienced



Threat Identification

An Operator Must :

- Consider and Evaluate Existing and Potential Threats
- Justify Elimination of Threats from Consideration

So, there is more to do than account for just Time Dependent and Time Independent Threats

- An Operator must look at “near misses”, known threats identified in Industry literature, PHMSA Advisory Bulletins, etc. and understand how threats interact with each other
- An Operator should also consider that Interactive Threats (interaction of multiple threats) can be a potential threat.



Potential Threats

- Some Operators are struggling with potential threats:
 - Threats the Operator has not previously experienced, but identified from industry or PHMSA information
 - Threats from aging infrastructure and materials with identified performance issues may need to be considered existing threats depending on the materials in question and the operating environment
 - Threats that endangered facilities but have not resulted in a leak (e.g., exposed pipe, near misses).
 - Non-leak threats (overpressure, exposure)
 - Manufacturing and Construction Threats
 - Maintenance history



Potential Threat Identification

- This is a thoughtful consideration of what else could go on that standard risk assessment models do not account for
- Consider what other threats (and interactive threats) exist in the Operator's unique operating environment
- Consideration of near miss events and abnormal operating condition events (just to name a couple of potential threat identification areas) is needed
- It can be resource intensive depending on the materials and operating environment
- Sufficient time and resources should be committed to the task(s)



Identified Potential Threats

Examples of potential threats often not being considered:

- Over pressurization events
- Regulator malfunction or freeze-up
- Cross-bores into sewer lines
- Materials, Equipment, Practices, etc. with identified performance issues
- Vehicular or Industrial activities
- Incorrect maintenance procedures or faulty components
- Rodents, plastic eating bugs, tree roots
- Other potential threats specific to the operator's unique operating environment



Interactive Threats

- Interact – To act on each other
- Two or more threats that, when occurring simultaneously, pose a threat to pipeline integrity.
- The concept of interactive threats and how to address them has perplexed many transmission operators.
- One transmission operator created a matrix of susceptibility for each combination of the B31.8S threats along with decision flow process for each set of credible interactive threats.



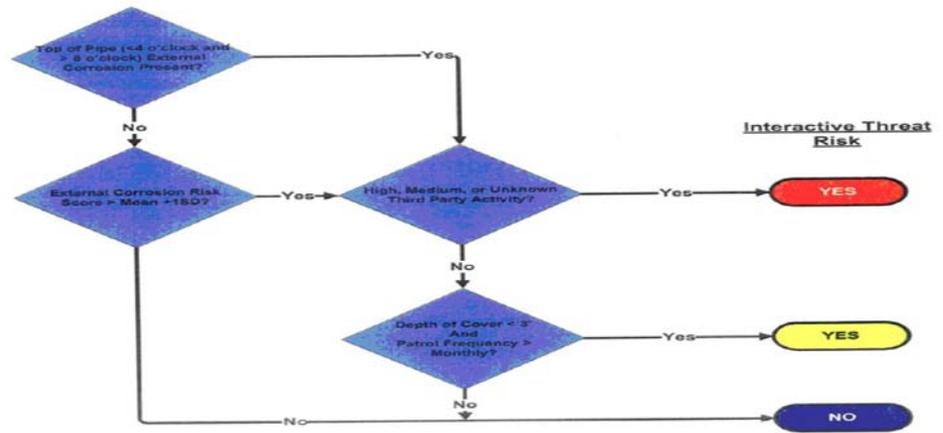
Interactive Threats

Threat Present

Threat Acting on Threat Present

Threats	EC	TP	IC	WOF	CONS	MFG	EQ	IO	SCC
EC	--	YES	NO	YES	YES	YES	YES	YES	YES
TP	YES	--	NO	YES	YES	YES	NO	YES	YES
IC	NO	NO	--	YES	NO	YES	YES	YES	NO
WOF	YES	YES	YES	--	YES	YES	NO	NO	YES
CONS	YES	YES	NO	YES	--	NO	NO	NO	YES
MFG	YES	YES	YES	YES	NO	--	YES	YES	NO
EQ	YES	NO	YES	NO	NO	YES	--	NO	NO
IO	YES	YES	YES	NO	NO	YES	NO	NO	NO
SCC	YES	YES	NO	YES	YES	NO	YES	NO	YES

External Corrosion & Third Party Interaction



Interactive threat analysis rules for HCA segments



Interactive Threats

- Examples of interacting threats to consider include:
 - Slow crack growth in older plastics where pipeline was pinched during operational event or where over-squeeze occurred due to improper tools or procedure
 - Slow crack growth in older plastics where non-modern construction practices were used
 - Water main leakage areas or areas of soil subsidence with cast iron mains
 - Installation of mechanical fittings without restraint (category 2 & 3) in soils or conditions (excavation damage) that cause pipe to pull out of fitting



Measures to Address Risks

192.1007(d)



Measure to Address Risks (Threats)

- Table 1 in PHMSA DIMP Inspection Forms 22 & 23 provides a quick overview of risk reduction and monitoring methods

	Primary Threat Category	Threat Subcategory, as appropriate	Measure to Reduce Risk	Performance Measure
1	Corrosion	External Corrosion on Copper Service Lines	Replace approximately 100 copper service lines each calendar year	Track number of leaks caused by external corrosion per 1000 copper service lines annually
2	Excavation Damage	Third Party Damage	Conduct pre-construction meetings or Monitor locate for life of ticket	Track frequency of failures per 1000 excavation tickets annually
3	Equipment Failure	Mechanical Fittings, Couplings or Caps/Seals	Repair or replace problem materials as found	Track frequency of failures by equipment type annually



Performance Measurement

192.1007(e)



Performance Measurement

- All performance measures need baseline.
- How was the baseline established?
- Should have some sort of “trigger” to initiate action.
- Each Measure must have a Performance Measure established to monitor its effectiveness
- Operators have identified a single performance measure to evaluate the effectiveness of multiple risk control measures.



Mechanical Fitting Failure

Reporting (MFFR)

and Data Analysis



Mechanical Fitting Failures Reporting and Data Analysis

- Communication of Performance Data through DIMP web page in a manner similar to Liquid and Gas IM. 2012 Annual report IM Performance Data will be posted along with 2012 MFFR data (first year) in or about May, 2013.
- 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).



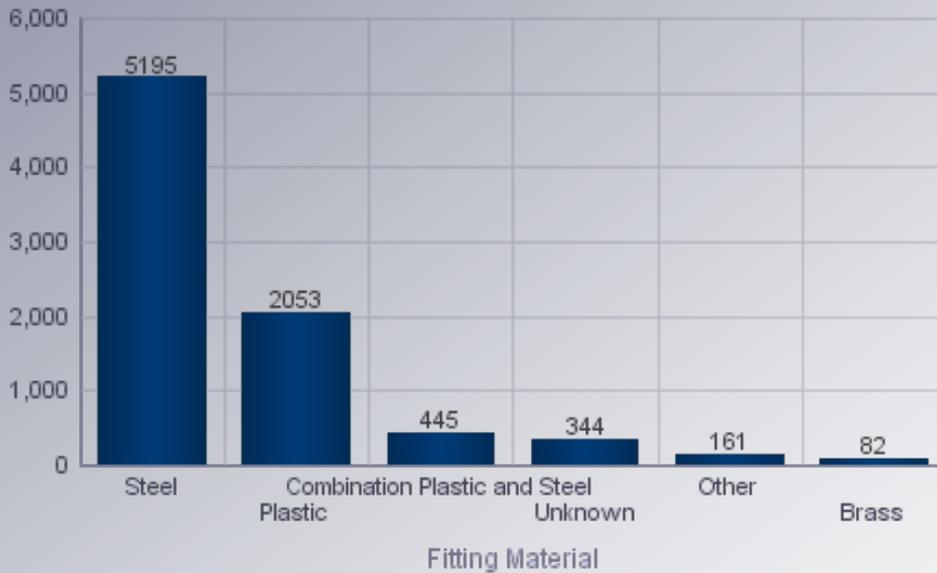
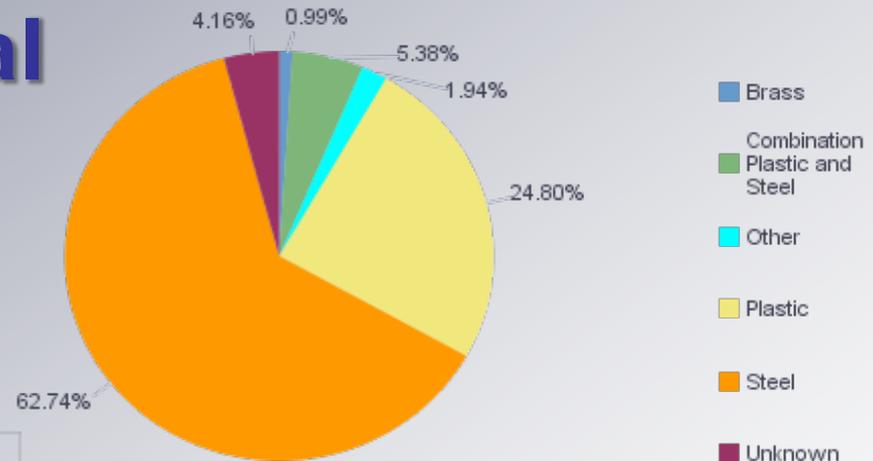
MFFR Data Analysis

- 2011 Data submitted by March 15, 2012 has been collected and analyzed, and that data is presented here.
- Approximately 8300 MFF reports were submitted for 2011.
- MFF represent 4.3% of hazardous leaks eliminated or repaired nationally in 2011.
- 2012 data is being collected (required by March 15, 2013), and results will be available shortly thereafter



Mechanical Fitting Failures by Material

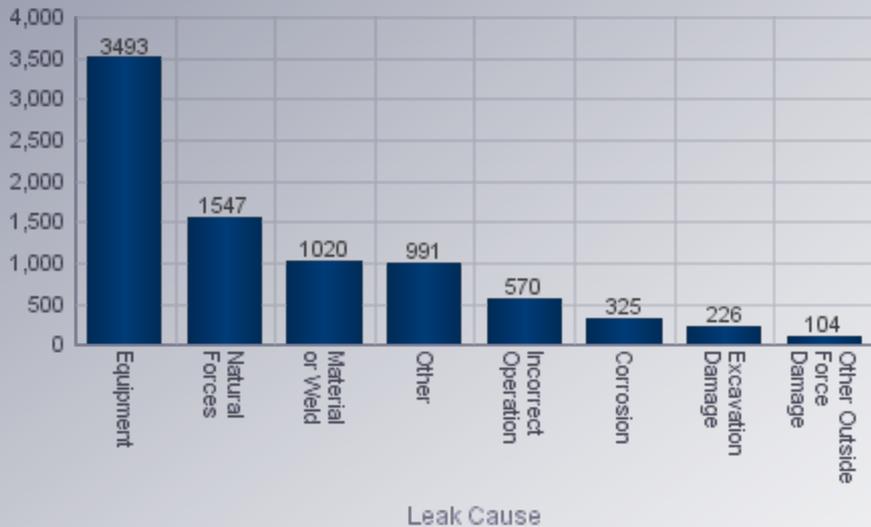
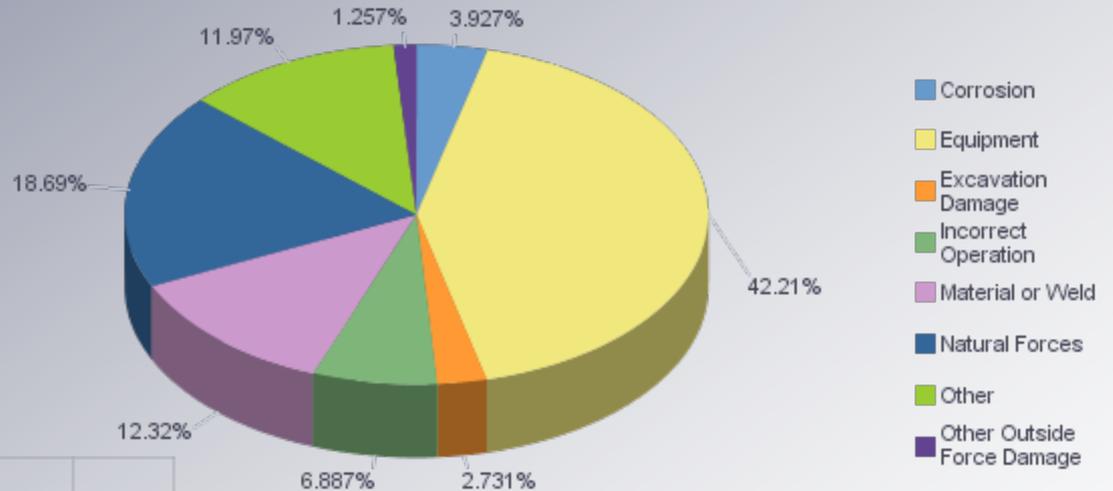
as of 3/21/2012





Mechanical Fitting Failures by Cause

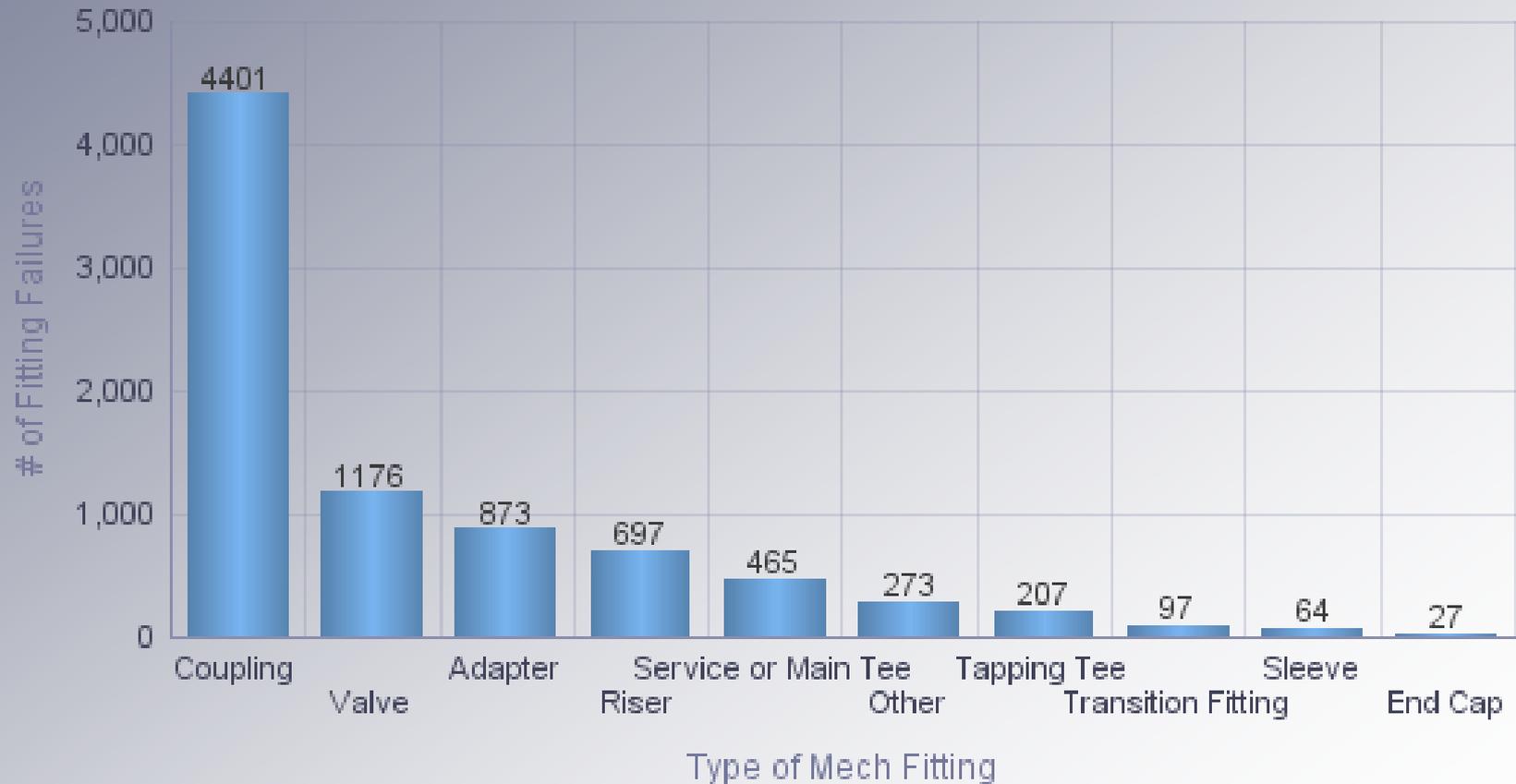
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Mechanical Fitting Failure by Type of Mechanical Fitting

as of 3/21/2012





Specify the Mechanical Fitting Involved



Stab Type



Nut Follower



Bolt Type



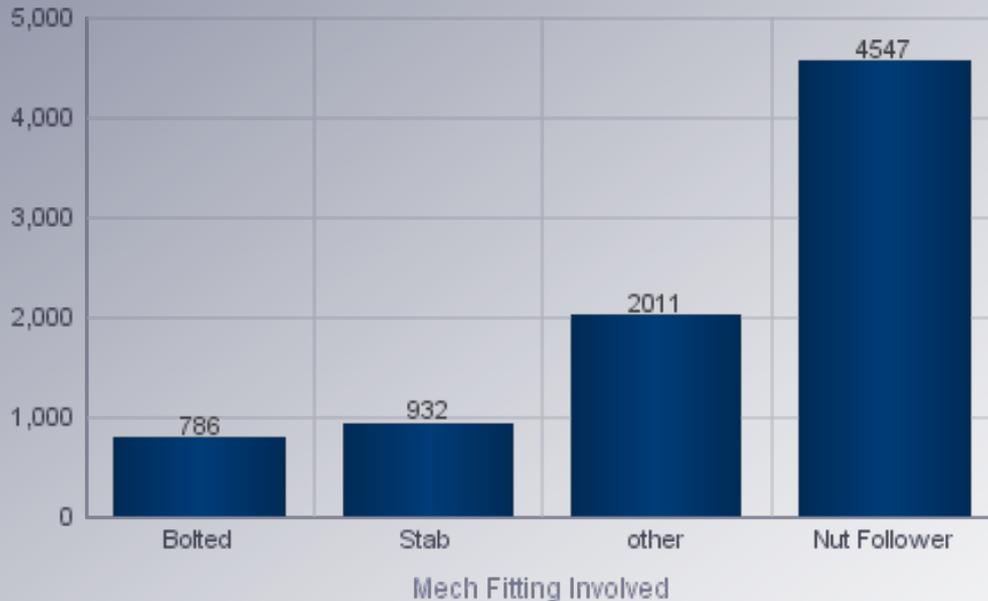
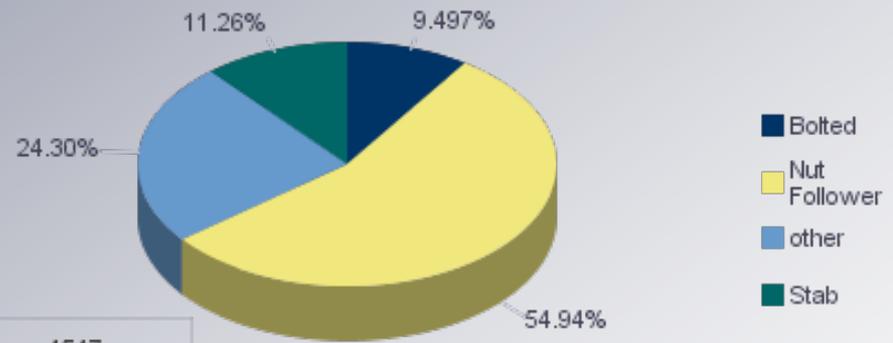
Other(s)





Mechanical Fitting Failures by Type

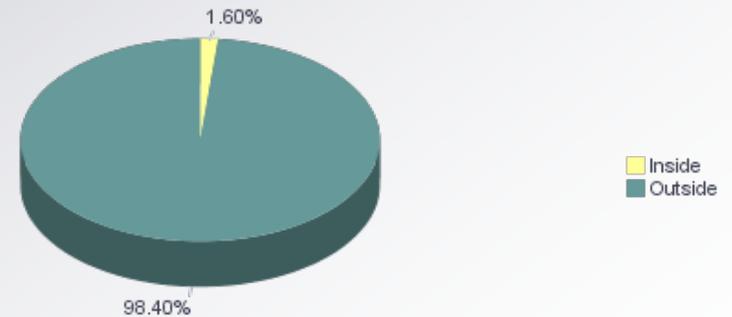
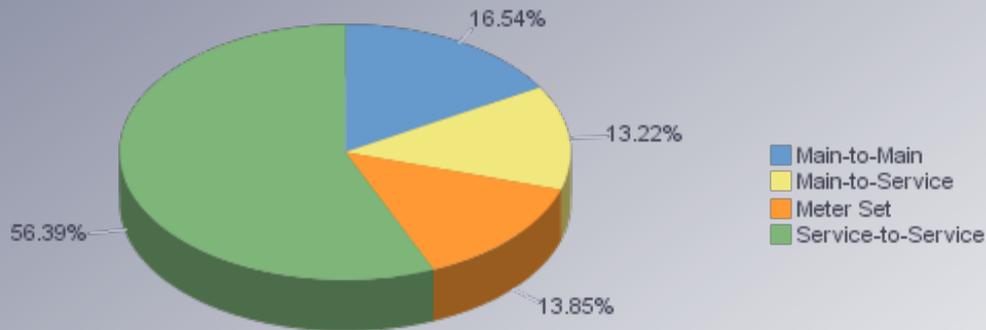
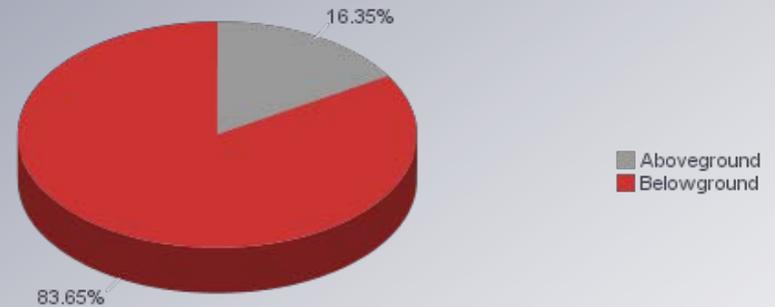
as of 3/21/2012





Mechanical Fitting Failures by Location in System

as of 3/21/2012





Manufacturer's Information for Mechanical Fittings

- The PPDC's manufacturer database file shows historical and current listings of manufacturers for plastic pipe and fittings used in natural gas distribution systems. The file is available on the PPDC website.
- AGA's Plastic Materials Committee's coupling database website is in the final stages of development. The coupling database has been developed for informational purposes only, and does not contain any information regarding the performance of the included couplings.



MFFR Data Analysis

- Raw data from 2011 MFFR is presented here as one year's worth of data does not allow for trending, and data reviewed confirmed PHMSA's expectations of what, where, when, and why mechanical fittings fail.
- Following the receipt of 2012 reports (by March 15, 2013), the MFFR Team will QA/QC the data and initiate analysis.
- Preliminary analysis of the 2012 data should be completed and posted on the DIMP Website by May, 2013. <http://primis.phmsa.dot.gov/dimp/pm5.htm>
- Results of the 2011-12 MFFR data analyses will be a topic at a DIMP Webinar proposed for June 27, 2013



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.



Record and Field Inspection Form

- Draft developed per NAPS Board request – In Testing
- Intended for inspections after initial DIMP inspections
- Anticipated to be posted by May, 2013

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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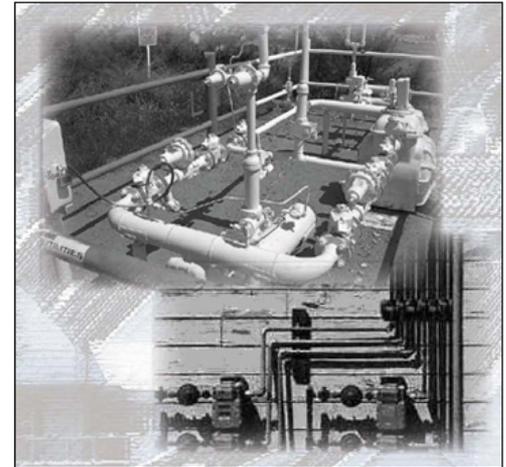


DIMP Home

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](#).



DIMP Communications

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)

DOT Website | PHMSA Website | Privacy Policy | FOIA

1. Search for Upcoming Meetings
2. View Past Presentations



DIMP History

1. DIMP FR Notices
2. "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

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



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 new and replaced 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](#)

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DIMP Performance Measures

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

Link to live demonstration of website, as available



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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)



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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.

Chris McLaren, DIMP Implementation Officer
Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration (PHMSA)
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
East Building, 2nd Floor
Washington, DC 20590
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 Website

Please regularly use PHMSA websites as they are a primary form of communication with Stakeholders

PHMSA Office of Pipeline safety

<http://phmsa.dot.gov/pipeline>

DIMP Home Page

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

Pipeline Safety Stakeholder Communications

<http://primis.phmsa.dot.gov/comm/>

Cast Iron Discussion Page

http://opsweb.phmsa.dot.gov/cast_iron/



Current Regulatory Topics for Distribution Operators



Farm Taps

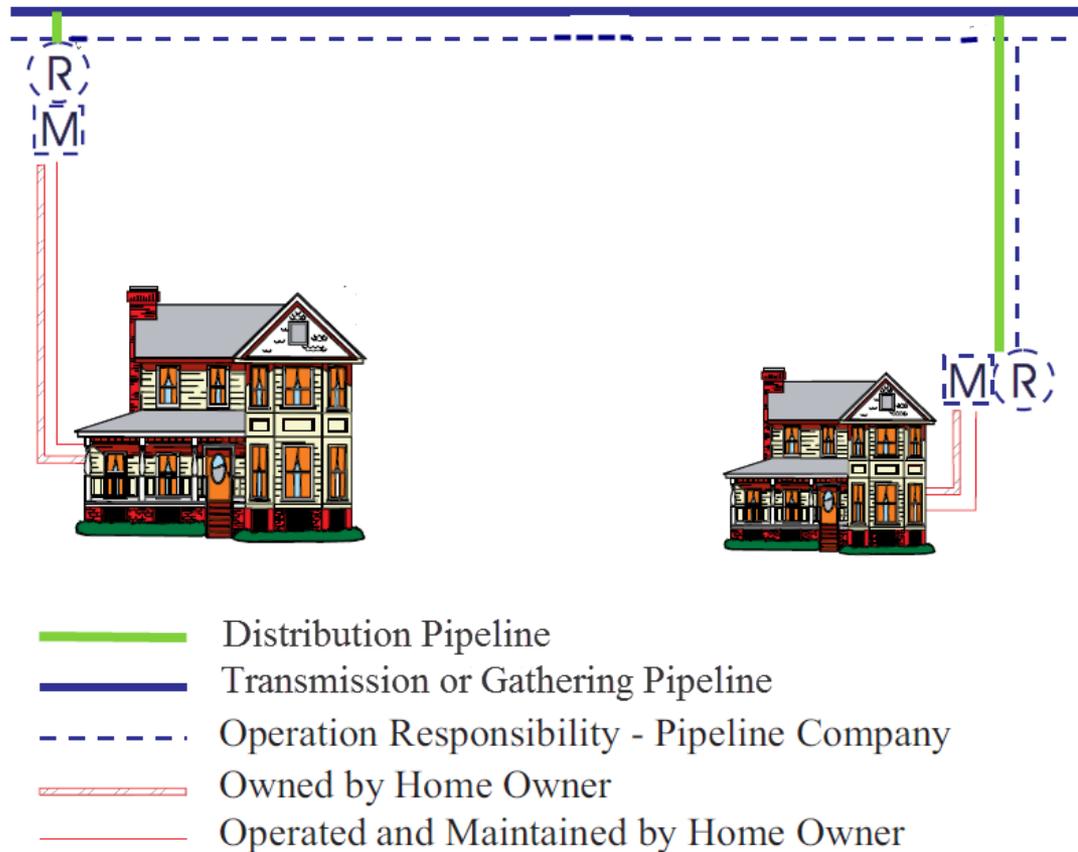
Quotes from preamble materials in “Customer-Owned Service Lines”,
60 Fed. Reg. 41821, 41823 (August 14, 1995):

PHMSA has defined a ‘farm tap’ as “industry jargon for a pipeline that branches from a transmission or gathering line to deliver gas to a farmer or other landowner.”

“... Some operators primarily engaged in the gathering or transmission of gas also operate distribution pipelines. They do so when they deliver gas directly to customers through farm taps and industrial taps. In fact, because portions of these delivery lines qualify as service lines, gathering and transmission operators report them as distribution pipelines under 49 CFR 191.13. Moreover, farm and industrial tap customers are not immune from harm by potential hazards that could occur on their piping. And surely not all farm and industrial tap customers know enough about gas piping safety to make even a single maintenance notice unnecessary.”



Farm Taps [from June 8, 2011]



- Do the facilities meet the definition of Gathering? No.
- Do they meet the definition of transmission? No.
- If No to both, Then the facilities are distribution.

The “farm tap” is pipeline upstream of the outlet of the customer meter or connection to the customer piping, whichever is further downstream, and is responsibility of the operator. The pipeline downstream of this point is the responsibility of the customer. Some States require the operator to maintain certain portions of customer owned pipeline. The pipeline maintained by the operator must be in compliance with 49 Part 192.



Treatment of Farm Taps in DIMP

- PHMSA continues to meet with and talk to industry groups to gather information, understand the need for change, and discuss solutions, and the Farm tap discussion involves regulated and unregulated production, gathering, transmission, and distribution pipeline operators.
- PHMSA takes Industry's concerns on the treatment of Farm Taps and their inclusion in DIMP very seriously, but there is a process that we have to go through in this matter. It is not a simple matter, and there are ramifications in each option that we discuss with Industry.
- PHMSA has considered Industry's concern over the inclusion of farm taps in the DIMP rule and believes that the risk to the public from farm taps is generally low. Therefore, PHMSA is considering amending Part 192 to exempt farm taps from the requirements of Part 192, Subpart P - Gas Distribution Pipeline Integrity Management..



DIMP Enforcement Guidance

- DIMP Enforcement Guidance has been posted.
- This guidance is 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 allows Operators to understand Regulators' expectations with regards to the DIMP Regulation



Questions and Answers