

**Summary of Comments on the DIMP NPRM
December 01, 2008**

Issue Categories	Primary Comments	Options to Address Comments (Preliminary)	Most Viable Options (Preliminary)	Committee Recommendation
1. Burdensome documentation requirements	<ul style="list-style-type: none"> • Need to document all decisions & changes • Delete most documentation requirements, except written IM program • Limit requirement for document retention to ten years • Limit required procedures to those that “reasonably describe” processes 	<ul style="list-style-type: none"> a. Limit documentation requirements to those in §192.1005 and §192.1007 b. Greatly reduce requirements in §192.1015; focus on wording similar to §192.1015(e) c. Clarify requirement to retain record of past versions of written IM program 	a, b, & c	
2. Reporting plastic pipe failures	<ul style="list-style-type: none"> • Requirement would add burden with no associated value • PPDC is doing an excellent job of developing & communicating insights • PPDC is expanding access to evaluation meetings • New system would lose years of failure data • NAPSAR noted that there is no documented statement of need • New system would have QA/QC issues 	<ul style="list-style-type: none"> a. Delete requirement b. Continue to rely on PPDC c. Seek to modify PPDC makeup and/or mission d. Promote broad communication of more expansive set of PPDC lessons e. Retain reporting of compression couplings failure 	a through e	
3. Performance through people	<ul style="list-style-type: none"> • Commenters were unanimously opposed to this provision • Data show small contribution of human error to risk - justification for provision doesn’t exist • Existing regulations plus CRM rule adequately cover any concern • PHMSA has not demonstrated the added value of this provision • Provision is ambiguous and would be extremely difficult to enforce 	<ul style="list-style-type: none"> a. Delete requirement b. Expand discussion to clarify/reduce ambiguity c. Accept industry offer to evaluate the issue separate from DIMP d. Ensure operators appropriately treat human error as a potential threat (e.g., inspector guidance) e. Require reporting by operators to PPDC (concern about FOIAbility) 	a	
4. Low stress transmission lines	<ul style="list-style-type: none"> • Inefficient use of resources results from treatment of low stress (<u>i.e.</u>, less than 30% SMYS) “transmission lines” separate from DIMP 	<ul style="list-style-type: none"> a. Beyond scope of NPRM b. Need to clarify leak/rupture transition c. Take up this issue separately from DIMP; DIMP may provide an adequate regulatory basis to address these lines 	a & c	

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5. Definition of “damage”	<ul style="list-style-type: none"> NAPSR stated that “Damage” should be limited to excavation damage Only damage leading to leaks requiring repair, replacement or removal from service should be included 	<ol style="list-style-type: none"> Do not define damage Limit to damage causing leaks Limit to damage requiring action – repair, replace Define “excavation damage” building on the definition in DIRT - increases clarity of reporting requirement 	d	
6. Time to implement DIMP provisions	<ul style="list-style-type: none"> “Fully” implement DIMP is not clear Eighteen (18) months is too little time to implement Consider allowing 24 months for implementation Consider separating time to develop a written program from that required to implement the program 	<ol style="list-style-type: none"> Retain same period Allow 12 months to prepare a written program (additional six months for availability of GPTC and SHRIMP guidance) Allow an additional 12 months to implement the program 	a	
7. Alternative intervals for periodic actions	<ul style="list-style-type: none"> Industry supports provision; believes cost benefit of rule requires adoption; feels consistent application requires PHMSA guidance States are wary; expressed the need for rule to clarify responsibility for decision on waiver requests; doesn’t support development of PHMSA guidance States believe wording on operator waiver requirement should change from “demonstrate no significant increase in risk” to “demonstrate no change in or improved safety” 	<ol style="list-style-type: none"> Clarify intent as to responsibility for decision on waiver requests (States approve, no PHMSA review) PHMSA will develop guidance for its own use on jurisdictional lines Will work with States as they request on generalizing guidance Can’t impose on States review process or requirement to accept changes 	a	
8. Limited requirements for master meters and LPG operators	<ul style="list-style-type: none"> MM & LPG operators should not be excluded from requirements (especially evaluation & prioritization of risks) Phase I study advocating inclusion of all operators should be followed MM & LPG requirements should be prescriptive & simple MM & LPG operators should have minimum administrative requirements 	<ol style="list-style-type: none"> Retain separate treatment; revise wording to include the requirement to “rank risks” Remove exclusion (allow simple programs to result from simple systems) Exclude from documentation requirements only 	a	

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9. Excess flow valve requirement	<ul style="list-style-type: none"> • Move requirement to Subpart H • Clarify that EFV installation is not required on branch service lines • State - expand requirement to include all situations in which installation is technically feasible • Include MM and LPG operators in requirement 	<ul style="list-style-type: none"> a. Leave in DIMP requirements b. Move provision to Subpart H c. Include MM and LPG operators in requirement d. Explicitly address EFV installation requirement on branch service lines 	<ul style="list-style-type: none"> b - this will lead to requiring implementation by MM; LPG operators are already required by NFPA Standard 58 to install EFVs d - clarify that EFVs are required for service lines servicing single family residences 	