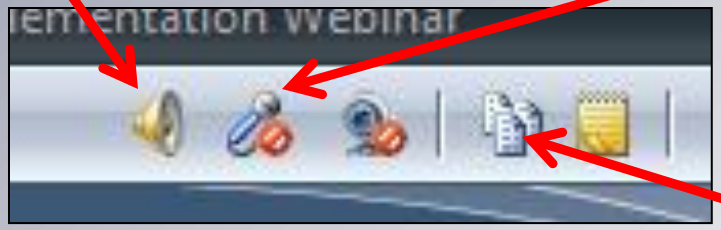
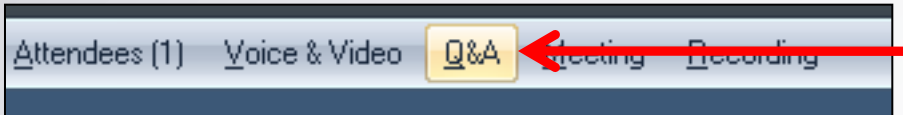
DIMP Implementation Webinar
May 10th 10:30 AM – 12:30 PM EDT

- Computer Audio Only – No phone line – Turn on speaker and leave mic off:



- Handouts can be downloaded by clicking on the handout icon
- Questions can be submitted at any time by clicking on the Q&A menu in the LiveMeeting menu bar near the top of the screen:



State-Federal DIMP Implementation Team

National Association of Pipeline Safety Representatives and Office of Pipeline Safety

May 10, 2011 from 10:30 AM to 12:30 PM EDT

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

HOW TO SUBMIT QUESTIONS & DOWNLOAD HANDOUTS DURING THIS WEBINAR VIA LIVEMEETING

For assistance, visit Live Meeting Help and Support:
http://r.office.microsoft.com/r/rlidLiveMeeting?p1=12&p2=en_US&p3=LMInfo&p4=support

Today's Topics

1. DIMP Pilot Inspection Findings & Lessons Learned
2. DIMP Website Navigation & Resources
3. DIMP Inspection Forms
4. Question & Answer Session
5. Session Concludes @ 12:30 PM EDT

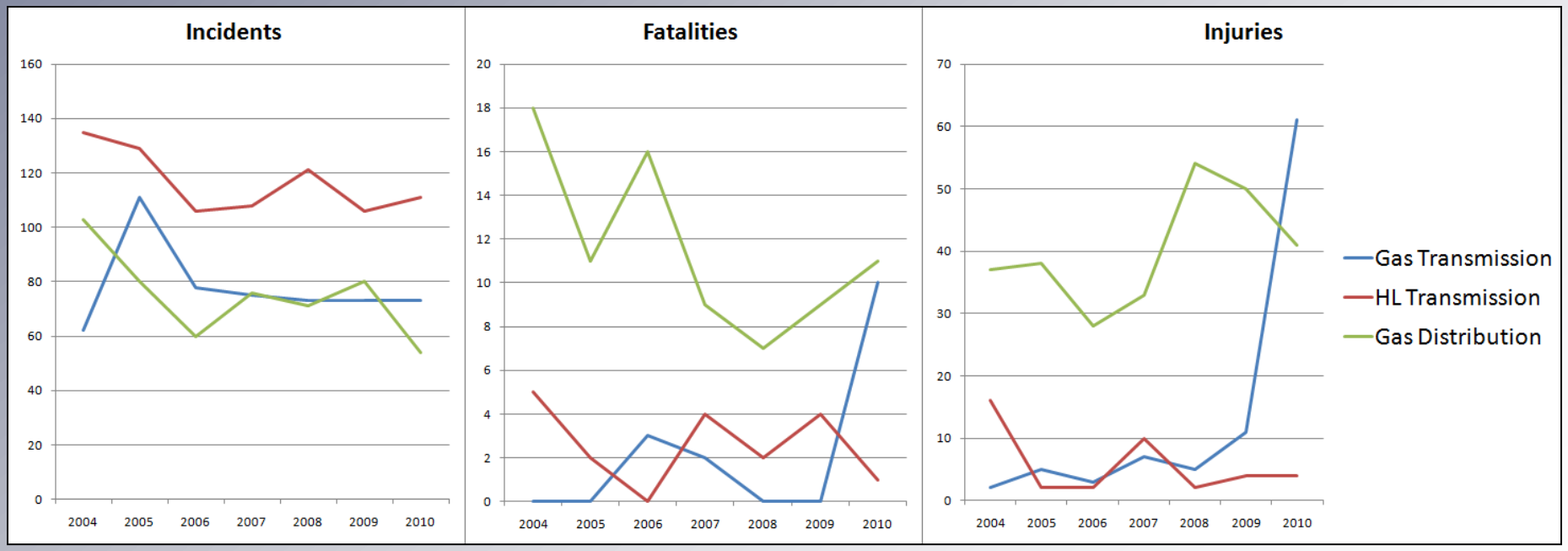
DIMP State-Federal Implementation Team Pilot Inspection Findings & Lessons Learned

National Association of Pipeline Safety Representatives and Office of Pipeline Safety

Darin Burk, Illinois Commerce Commission, Pipeline Safety Manager

Need for DIMP

Distribution incidents continue to occur



...resulting in significant consequences.

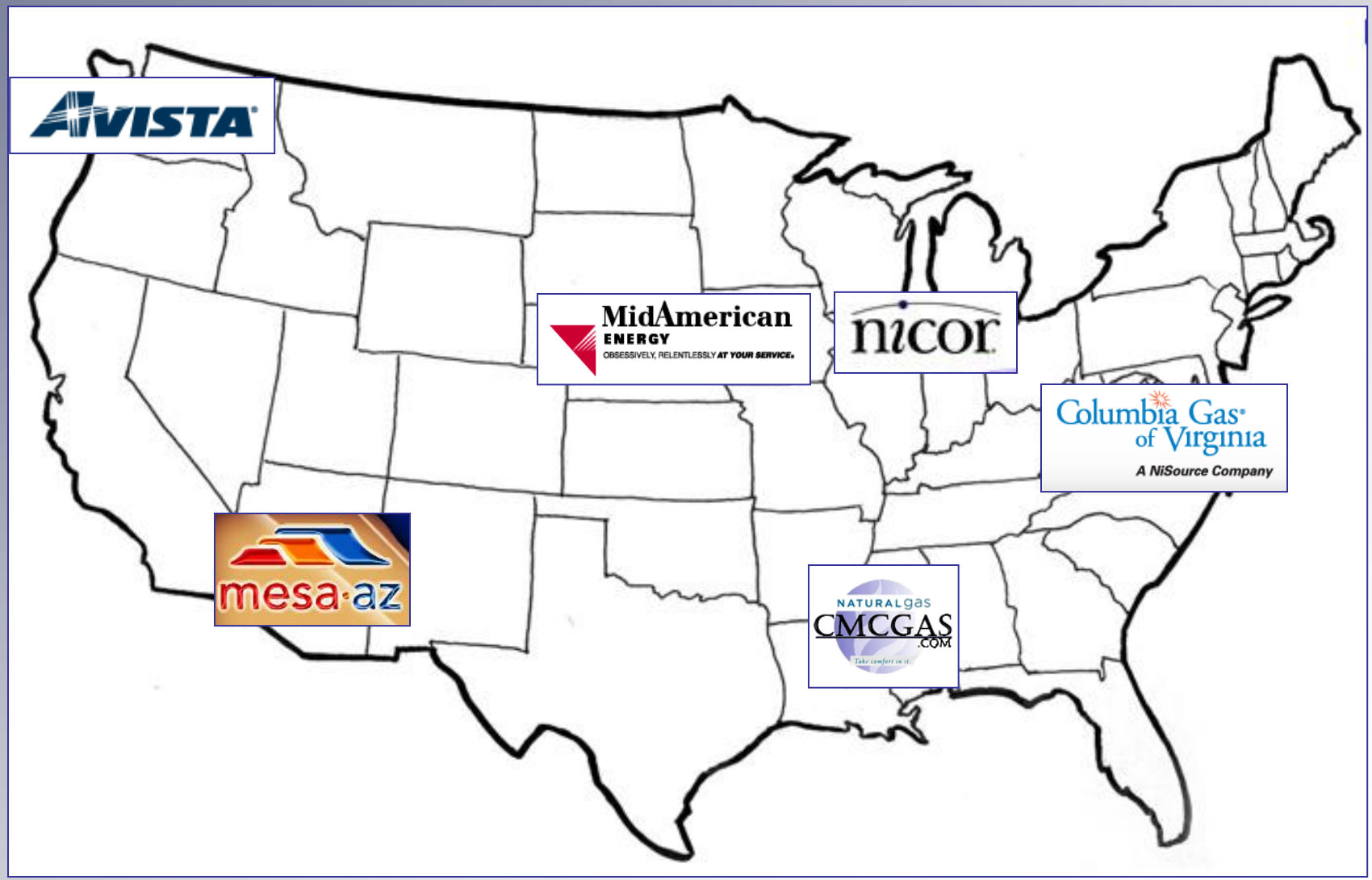
Topics

- Objective of DIMP Pilot Inspections
- General Observations
- Shortcomings Found in Plans
- Guidance for Operators From Pilot Inspections

Objective of DIMP Pilot Inspections

- Test the inspection form:
  - Are the inspection questions clear?
  - How did the operator interpret the question?
  - Did the documentation the operator provided demonstrate compliance with the regulation?
  - What level of detail was provided?
- Identify if additional FAQ's are needed.
- Develop a consensus for expectations among regulators.

Operators Selected



General Observations

- Large, serious effort - began 2007 to early 2010
- Few fully dedicated DIMP personnel; many teams
- Many operators are using GPTC and SHRIMP
- Modifying commercial plan development and risk model tools
- Change from compliance to integrity management culture
  - Forces a structured approach to prioritize work.
  - Provides "compliance leverage" for funding system integrity projects.

General Observations

Operators are taking a deep look at data:

- Scrubbing data
- Modifying data collection procedures
- Enhancing training on data collection
- Improving/implementing computer applications and hardware (office and field)
- Requires geographical relationship of data
- Documenting reason for data anomalies
- Using a minimum of 5-10 yrs, sometimes using much more to develop trend lines.

General Observations

- DIMP should address system integrity issues through data analysis; Newly identified issues may require immediate action
- Substantive effort for apparent cause analysis of mechanical fitting failures (field extraction and lab analysis)
- Not many new risks identified; operators tended to focus on known risks rather than look for other risks
- Variety of risk models; material specific replacement models to models including all threats to system

Shortcomings Found in Plans

- Plans failed to include revision log, version, effective date, revision date.
- Procedures lacked:
  - Operator specific practices and system characteristics.
  - Description of who, what, when, where, and how.
  - References to procedures in other manuals (O&M)
- Not considering failures without a release, e.g. overpressurization events

Shortcomings Found in Plans

- System subdivision was not sufficient to identify problems.
- Risk ranking did not include all risks to all facilities.
- Measures to reduce risk were too focused on pipe replacement rather than preventative measures designed to reduce risk.

Expectation of an Operator Plan

- Develop and Implement the elements
  - "Implemented"
    - Completed risk evaluation
    - Identified measures to address risk
    - Allocated and scheduled resources
    - FAQs C.3.8 & C.8.3 discuss what operators need to have implemented by August 2, 2011?
- Multi-state operators create a risk ranking which:
  - Encompasses all of an operator's facilities
  - Can be filtered by state so that it can be reviewable on a state-by-state basis
- Plan can apply to one or more states

Knowledge Guidance

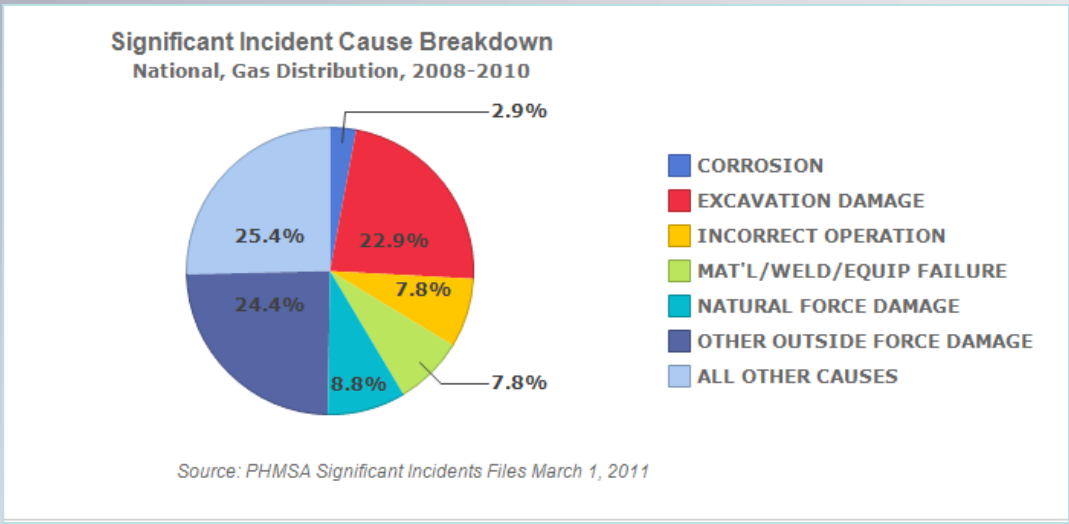
- "Reasonably available" information
  - FAQ C.4.a.5 What comprises "reasonably available" information?
  - Has impact on current pipe integrity
  - Digging up pipe not required
  - May be offsite warehouse
  - To demonstrate include a list of information sources used showing the title, date range (why selected), location
- Include a list of the data needed to fill gaps due to missing, inaccurate, or incomplete records
- Update recordkeeping procedures to include obtaining or correct missing or questionable data

Threat Identification Guidance

- Good practices that operators were performing:
  - Creating threat matrices
  - Summarizing trending of historical leaks and leak repairs
  - Distinguishing future "unknown" leaks eliminated by replacement
  - Trending "mean year of installation" – older pipe replacement.
  - Looking at rolling averages, takes out yearly anomalies.
  - Correlating system characteristics to failure rate.
- Geographic relationship of data is critical
- Identify failures without a release, e.g. overpressurization events

Threat Identification Guidance

- Potential threats are threats where the operator has not experienced a failure but they have conditions conducive to the threat
- Examples of potential threats:
  - Hurricanes or Flooding
  - Trenchless technology – unknowingly bored thru sewer



Risk Evaluation Guidance

- Understand how your risk model works. Each current and potential threat requires a consequence and likelihood weighting
- Subdivide facilities by measures to reduce risk; balance enough granularity with too much granularity to identify problems
- "Reasonable result" – is the ranking reasonable, justified through quantitative data, in agreement with SME validation?

Measures to Reduce Risk Guidance

- Include all risk reduction measures required by the DIMP risk evaluation in your plan.
- Additional risk reduction measures you voluntarily perform may be included in their plan but are not required to be
- Examples
  - Hurricane Plans to shut in systems
  - Patrol and leak survey more frequently than code
  - Monthly rectifier readings
  - Riser replacement programs
  - Cast iron surveys after earthquakes
  - Pipe replacement program

"Effective" Leak Management Guidance

An *Effective Leak Management Program* includes but is not limited to the following:

- **L**ocate the leaks in the distribution system;
- **E**valuate the actual or potential hazards associated with these leaks;
- **A**ct appropriately to mitigate these hazards;
- **K**eep records; and
- **S**elf-assess to determine if additional actions are necessary to keep people and property safe.

An operator must either include the leak management program procedures in its DIMP plan or reference the procedures in your O&M.

Performance Measures Guidance

- Each measure or group of measures to reduce a risk needs a performance measure
- Establish a baseline for every performance measure
  - May only have one data point as the data will be collected going forward
  - Explain why that performance measure was chosen
  - Describe how the data is or will be collected

Performance Measure Example

Threat:

Other Outside Forces, Damage to above ground facilities by vehicles and vandalism.

Measures to Reduce Risk:

- Idle riser program for monitoring and maintaining idle risers.
- High priority to meters at risk of future vehicular damage identification program. Work Request packets created and work prioritized for meters in vehicular zones.

Performance Measure:

Track and monitor the frequency of failures due to vehicles in vehicular zones.

Periodic Evaluation and Improvement Guidance

- What are possible program review triggers?
  - Completion of a measure to reduce risk
  - Completion of a replacement program
  - Leak rate are not decreasing
- Solely rerunning the risk model or reviewing the performance measure data does not constitute a review

Periodic Evaluation & Improvement Guidance

What constitutes a program review?

- Review frequency of periodic evaluation, < 5 years
- Verify general information
- Incorporate new system information
- Re-evaluation of threats and risk
- Review the frequency of the measures to reduce risk
- Review the effectiveness of the measures to reduce risk
- Modify the measures to reduce risk and refine/improve as needed
- Review performance measures, refine/improve as needed

Records Guidance

- Maintain records demonstrating compliance for 10 years
  - Includes records used for knowledge, threat identification, risk evaluation
  - Measures to address risk documentation
  - Performance measures use to evaluate effectiveness
  - For example, if 20 years of CP records were reviewed, maintain them for 10 additional years

DIMP WEBSITE NAVIGATION & CONTENTS

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U.S. Department of Transportation

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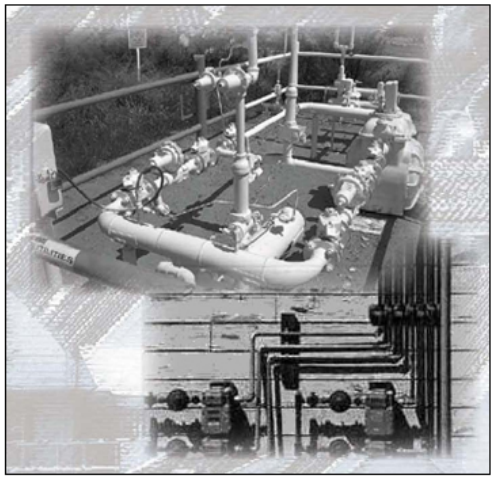
Distribution Integrity Management



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

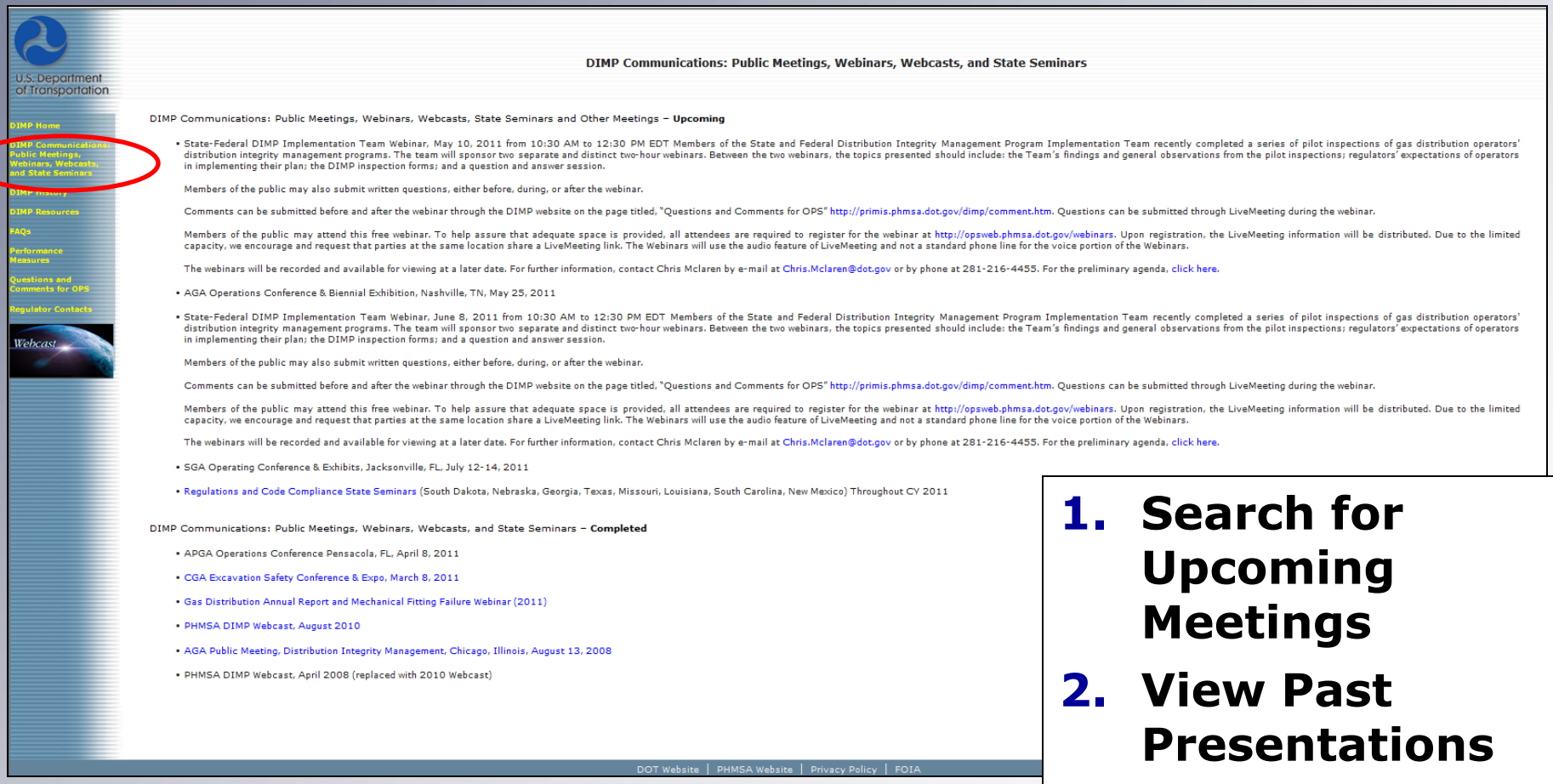
The DIMP Inspection Forms as well as other resources to support operators implement their program are on the DIMP Resources page and through PHMSA's Pipeline Safety website.

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.

DOT Website | PHMSA Website | Privacy Policy | FOIA

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

DIMP Communications



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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)

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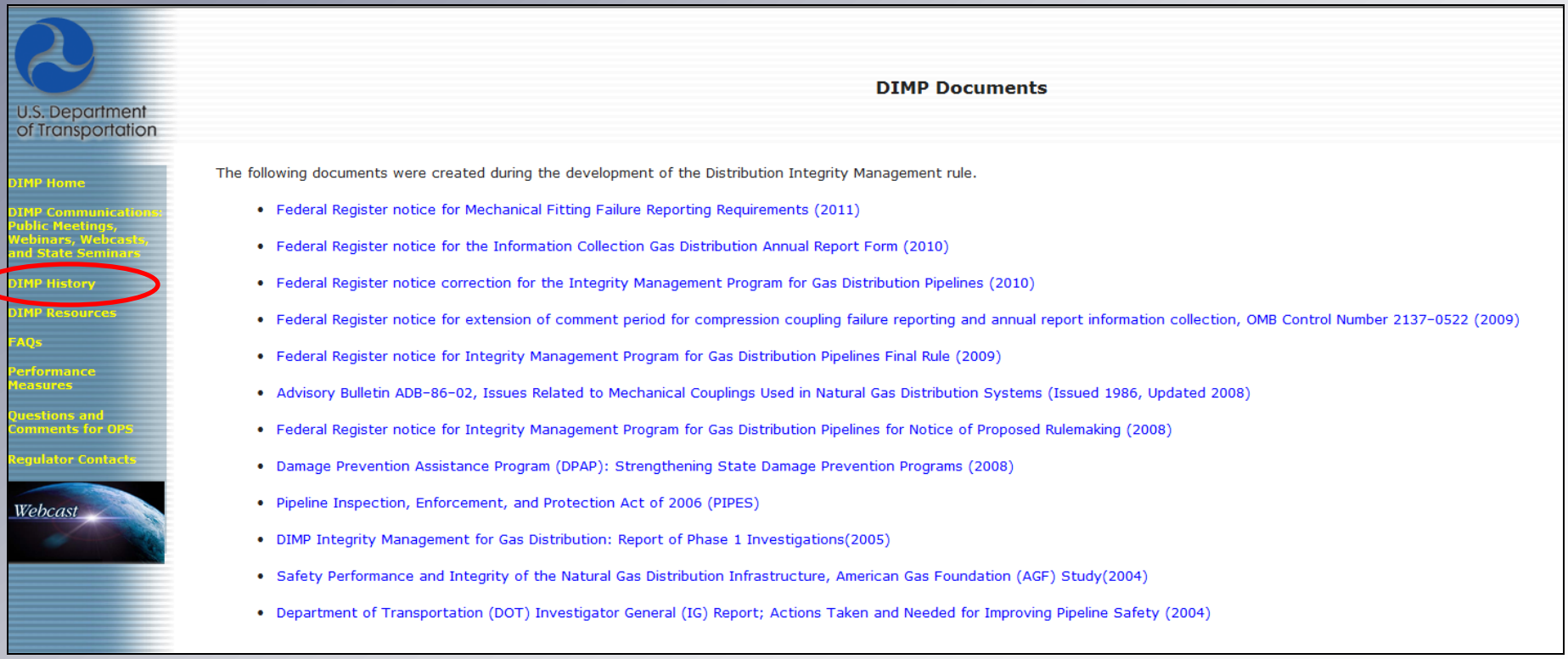
1. **Search for Upcoming Meetings**
2. **View Past Presentations**

http://primis.phmsa.dot.gov/dimp/meetings.htm

DIMP History

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



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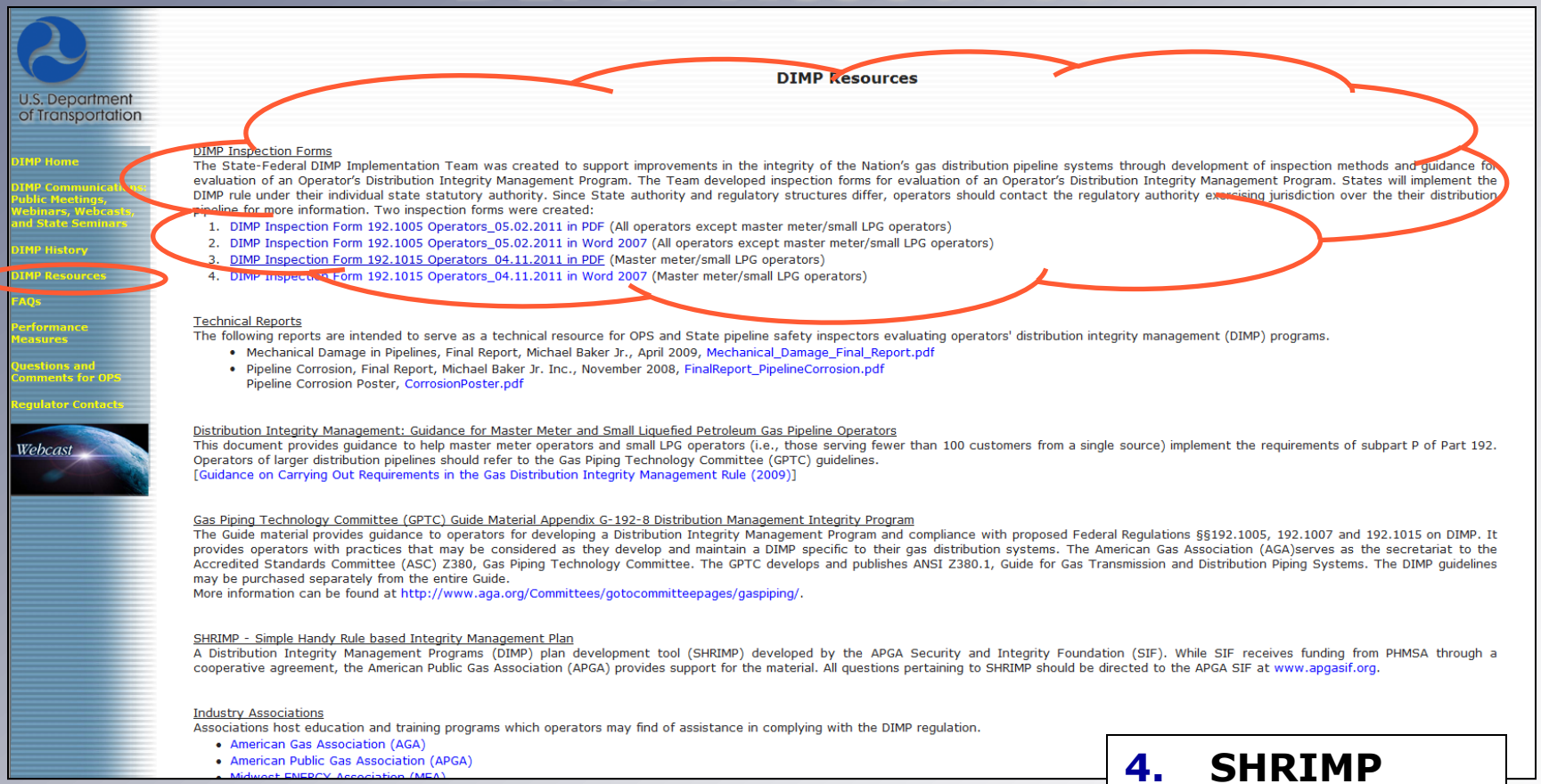
DIMP Documents

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)

http://primis.phmsa.dot.gov/dimp/history.htm

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 the their distribution pipeline 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.

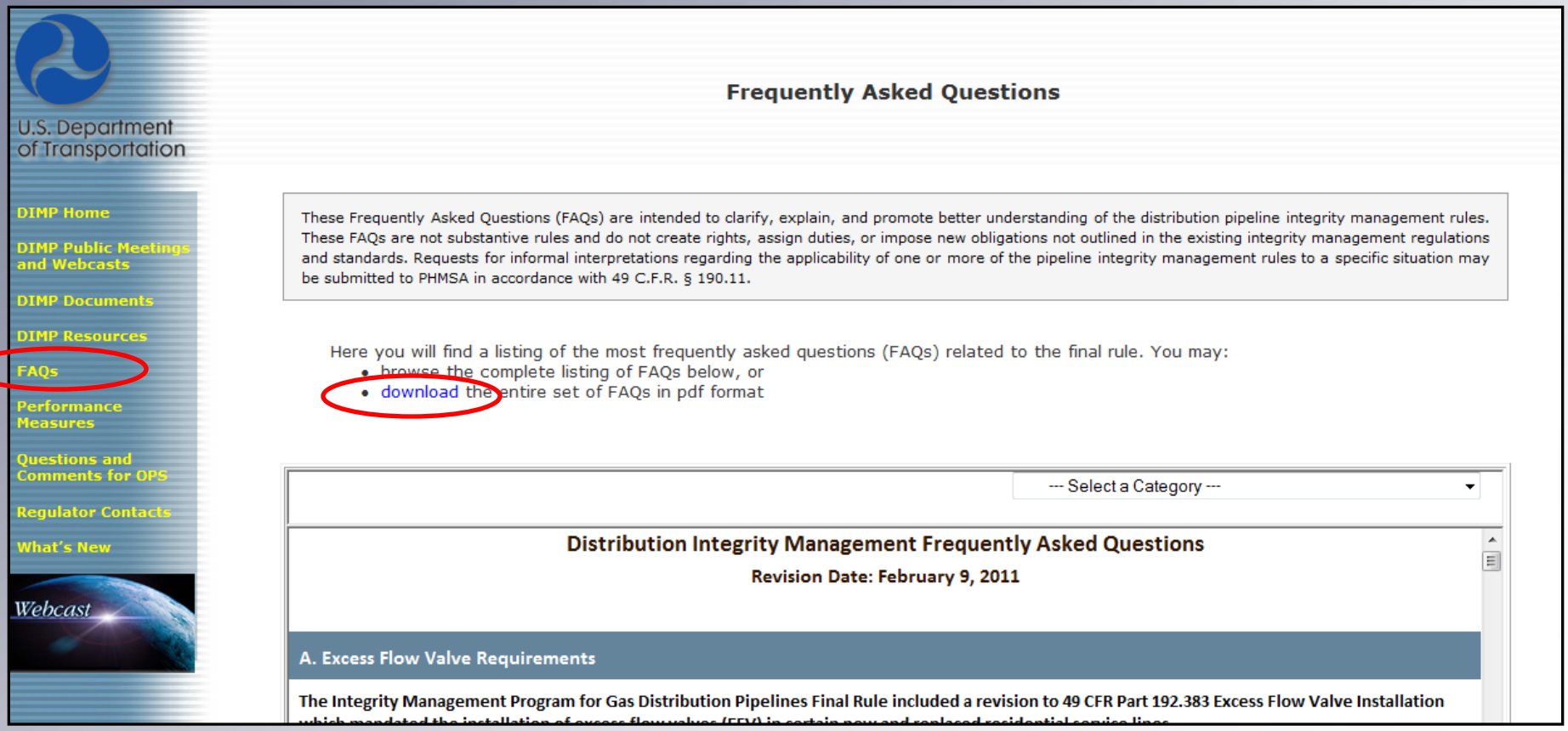
Industry Associations
Associations host education and training programs which operators may find of assistance in complying with the DIMP regulation.

- 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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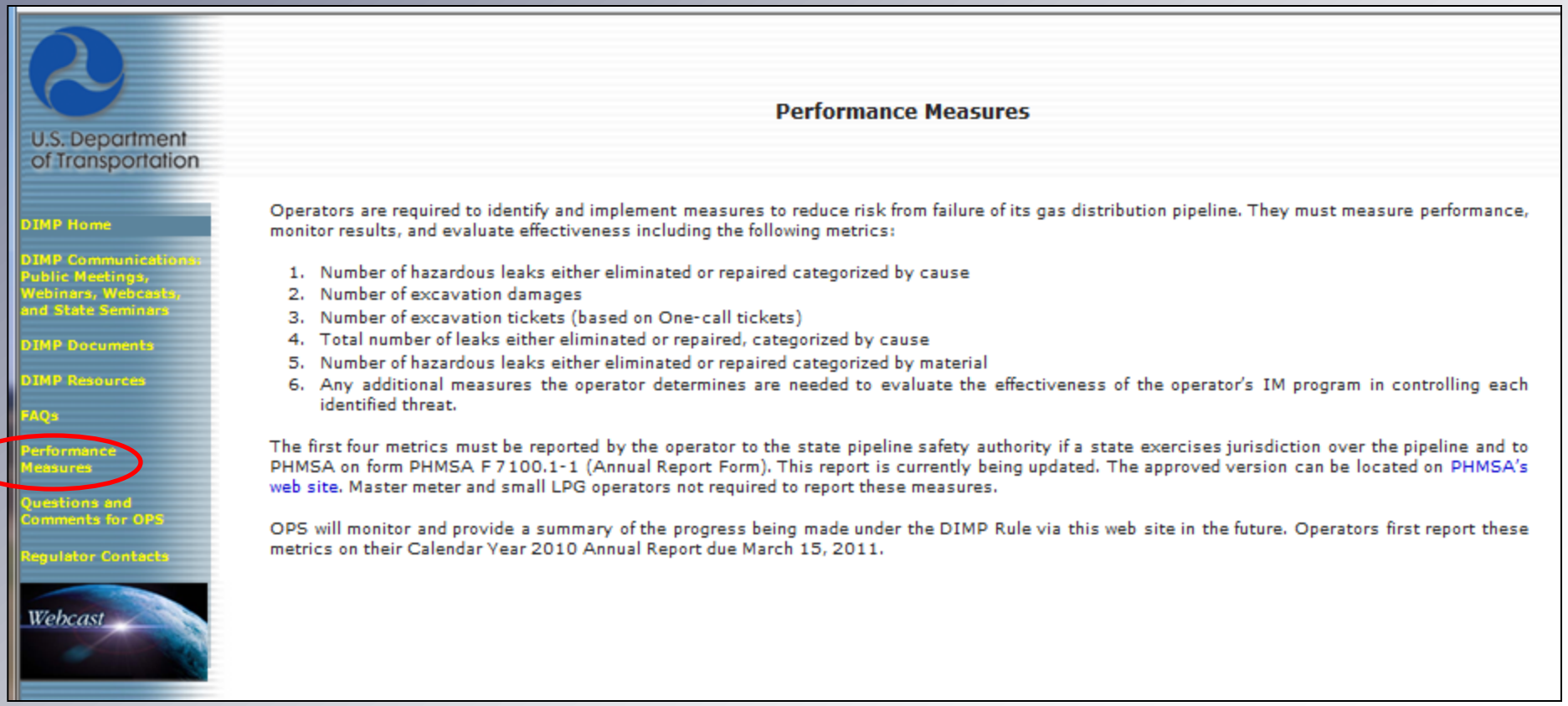
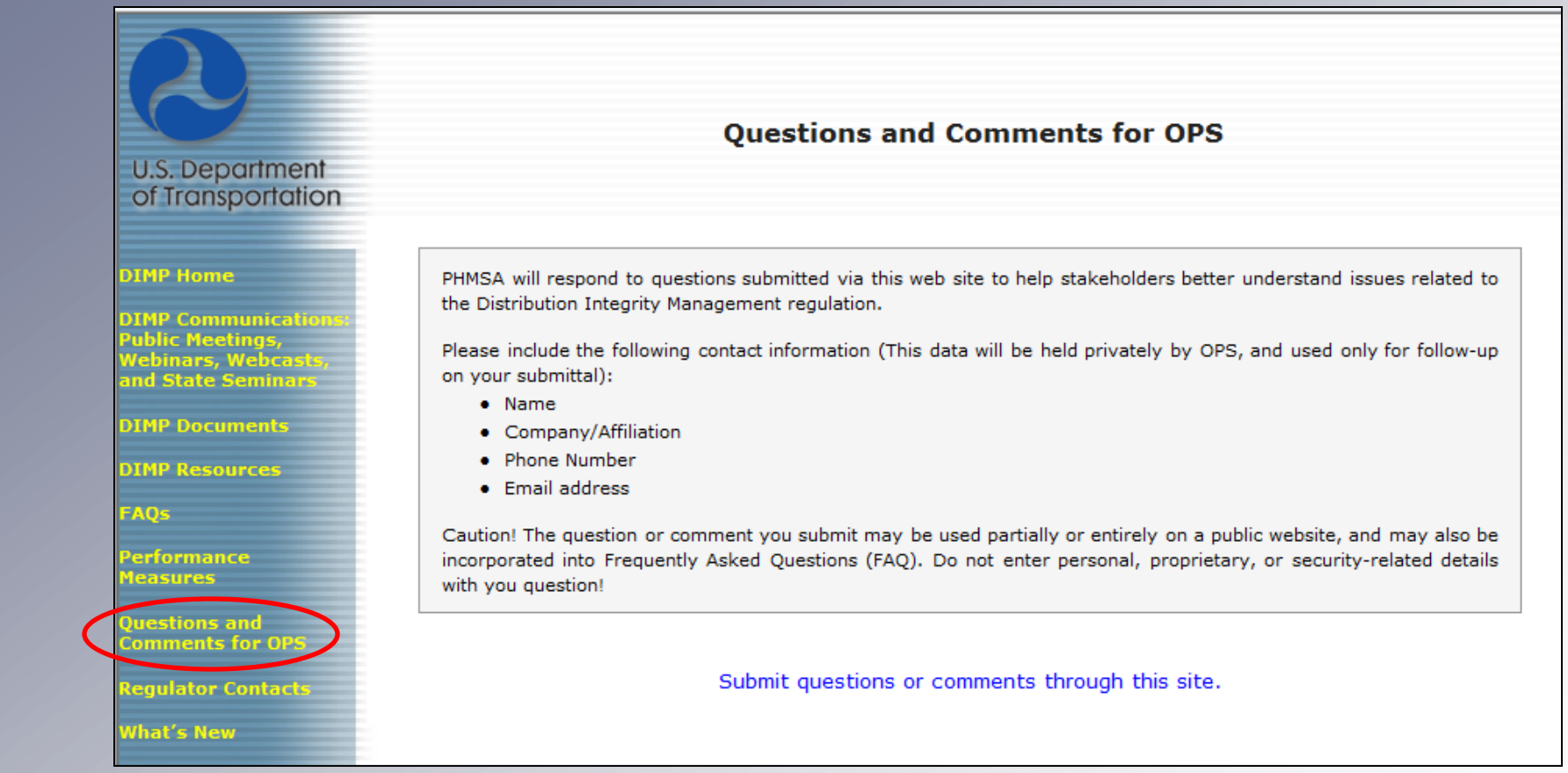
DIMP Performance Measures



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



SUBMIT QUESTIONS AT ANY TIME @ HTTP://PRIMIS.PHMSA.DOT.GOV/DIMP/COMMENT.HTM

DIMP Regulator Contacts

How to Contact Chris

&

Link to State pipeline safety agencies

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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 the 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

http://primis.phmsa.dot.gov/dimp/contacts.htm

FINAL DIMP INSPECTION FORMS

1. **DIMP Inspection Form 192.1005 Operators_05.02.2011**
   (All operators except master meter/small LPG)

2. **DIMP Inspection Form 192.1015 Operators_04.11.2011**
   (Master meter/small LPG operators)

Format of Inspection Forms

- Questions closely adhere to code language
- Regulatory requirements vs. information only
- "e.g." not all inclusive, some may be applicable to an individual operator
- Divided into sections for DIMP plan, Plan Elements, Reporting, Records
- Most inspectors will use online database, same questions, different format

192.1005 What must a gas distribution operator do to implement this subpart?

Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
1	.1005	Was the plan written and implemented per the requirement of 192.1005 by 08/02/2011? OR For a gas system put into service or acquired after 08/02/2011, was a plan written and implemented prior to beginning of operation?	☐	☐	☐	☐

192.1005 Inspection Form

Distribution Integrity Management Program (DIMP)

Inspection Form

For Operators of Gas Distribution Systems

For Requirements of 192.1005 – 192.1011

Version 5/2/2011

This inspection form is for the evaluation of a gas distribution integrity management program for all operators of gas distribution except operators of master meter or small liquefied petroleum gas (LPG) systems. The form contains questions related to specific regulatory requirements and questions which are strictly for informational purposes. The questions which are 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".

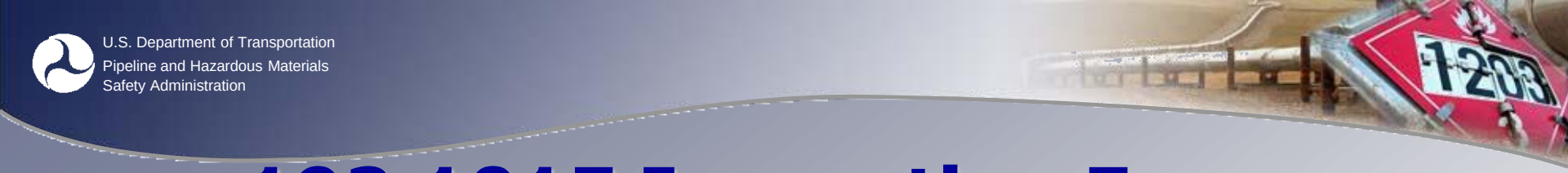
S/Y stands for "Satisfactory" or "Yes", U/N stands for "Unsatisfactory" or "No", N/A stands for "Not Applicable", and N/C stands for "Not Checked". If an item is marked U/N, N/A, or N/C, an explanation must be included in the comments section.

Some inspection questions contain examples to further clarify the intent of the question. For example, question 5 asks, "Do the written procedures require the consideration of information gained from past design, operations, and maintenance (e.g. O&M activities, field surveys, One-Call system information, excavation damage, etc.)?" 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.

192.1005 What must a gas distribution operator do to implement this subpart?

Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
1	.1005	Was the plan written and implemented per the requirement of 192.1005 by 08/02/2011? OR For a gas system put into service or acquired after 08/02/2011, was a plan written and implemented prior to beginning of operation?	☐	☐	☐	☐
Inspector's Comments						
2	Information Only	Were commercially available product(s)/templates used in the development of the operator's written integrity management plan?	☐	☐	☐	☐
		Fully ☐ Partially ☐ Not at all ☐				
		Commercial product(s)/templates name if used:				
Inspector's Comments						
3	Information Only	Does the operator's plan assign responsibility, including titles and positions, of those accountable for developing and implementing required actions?	☐	☐	☐	☐
Inspector's Comments						
4	.1007(a)(1)	Do the written procedures identify or reference the appropriate sources used to determine the following characteristics necessary to assess the threats and risks to the integrity of the pipeline: • Design (e.g. type of construction, inserted pipe, rehabilitated pipe method, materials, sizes, dates of installation, mains and services, etc.)?	☐	☐	☐	☐
		• Operating Conditions (e.g. pressure, gas quality, etc.)?	☐	☐	☐	☐
		• Operating Environmental Factors (e.g. corrosive soil conditions, frost heave, land subsidence, landslides, washouts, snow damage, external heat sources, business districts, wall-to-wall paving, population density, difficult to evacuate facilities, valve placement, etc.)?	☐	☐	☐	☐
Inspector's Comments						



192.1015 Inspection Form

Distribution Integrity Management Program (DIMP)

Inspection Form

For Master Meter and Small LPG Operators of Gas Distribution Systems

For Requirements of 192.1015

Version 4/11/2011

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.

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

Table 1: Threat/Risk Reduction Measure/PM

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				

Add rows as needed (to add row, place curser in last cell and click the "Tab" key).

Question and Answer Session

Thank you for your interest in distribution integrity management!

Next Webinar:

June 8th 10:30 AM – 12:30 PM EDT

Submit your questions/comments @
http://primis.phmsa.dot.gov/dimp/comment.htm