

# Ohio Gas Association

2010 Spring Technical Seminar

## DIMP: What's Your Plan?

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# Topics

1. DIMP rule
2. What do I need to be doing now?
3. DIMP Plan requirements
4. DIMP Plan resources
5. Questions and answers

# DIMP Rule – Key Dates

1. December 4, 2009 – Final DIMP rule
2. February 12, 2010 – Effective date (revised)
3. ???? PHMSA definition of compression couplings
4. ???? PHMSA revision of F 7100.1-1 form
5. March 15, 2011 – Reporting of compression coupling data and number of EFV's installed
6. August 2, 2011 – Implement written DIMP Plan

# DIMP Rule – Changes from NPRM

1. Eliminated plastic pipe failure reporting
2. Eliminated “Performance through People”
3. Revised the documentation requirements
4. Removed enhanced excavation damage prevention
5. Deleted “Fully” to implementation time description
6. Limited requirements for Master Meter and small LPG Operators

# DIMP Rule - New Requirements

1. Revised 192.383 to require installation of EFV's
2. Monitor new performance measures
3. Annual reporting of failed compression couplings, new performance measures, EFV's installed
4. Develop and implement written DIMP Plan
5. Master meter and small LPG operators have similar, but simpler, requirements compared to distribution system operators

# DIMP Rule – Alternate Intervals

1. Allows operators to propose alternate intervals for Part 192 periodic inspections
  - Engineering analysis and risk assessment required by operator
  - Must demonstrate that the adjusted interval will provide an equal or greater level of safety by showing how the resources are being used to mitigate risk in other areas
  - Will require collaboration and approval with State Pipeline Safety professionals and/or PHMSA

# DIMP Rule – Definitions

- Excavation Damage
- Hazardous Leak
- Integrity Management Plan
- Integrity Management Program
- Small LPG Operator

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  - Applies to master meter and small LPG systems

# What do I Need to be Doing Now?

2. Start keeping records of the number of EFV's installed and any failed compression couplings if not already doing so
  - This information needs to be included in your 2011 annual reports, which encompasses calendar year 2010
  - Reporting required for failure of compression couplings resulting in *hazardous* leaks only, and must include location in the system, pipe size, material type, etc. per 192.1009
  - Master meter and small LPG operators are excluded since they don't file annual F 7100.1-1 reports

# What do I Need to be Doing Now?

3. Keep good records of any material installed in your system
4. Prepare to start (or start) tracking data for the three new performance measures in 192.1007 required to be reported in 2012 (except master meter and small LPG operators)
5. Start reviewing construction records, inspection records, and repair records in preparation for DIMP plan creation
6. Set some goals for development of your DIMP Plan



# Written DIMP Plan for Operators

(excluding master meter and small LPG operators)

- The function of the plan is to document how each of the seven required elements will be addressed and implemented

# Knowledge

1. Develop an understanding of your distribution system
2. Understanding should come from reasonably available information, including records, employee input, and annual reports
3. Does not require additional investigations (e.g., excavation) to discover information about the pipeline
4. Use best information available and update when better information becomes available, such as future excavations

# Identify Threats

1. Identify threats that affect, or could potentially affect, your distribution pipelines
2. Must consider the eight general categories of threats listed on the F 7100.1-1 form
3. Applicable threats may be identified by reviewing relevant operating and maintenance records, considering the knowledge of the operating personnel, and evaluating relevant information

# Evaluate and Rank Risk

1. Operator must determine the relative importance of each threat and estimate and rank the risk
2. Operator might choose to group facilities into categories with similar characteristics (e.g. contiguous areas, common materials, facility type, etc.)
3. Determine risk. Risk is the product of the likelihood (or frequency) of a problem occurring and the consequences that could be caused by the problem if it occurs (Risk = Frequency x Consequences)
4. Establish relative risk ranking
5. Validate the results of the risk ranking

**SIX-INCH AND SMALLER CAST IRON, SUBURBAN AREAS, LOW PRESSURE**

<b>Threat</b>	<b>Likelihood</b>	<b>Consequence</b>	<b>Relative Risk</b>
<b>Corrosion</b>	<b>2</b>	<b>12</b>	<b>24</b>
<b>Excavation Damage</b>	<b>8</b>	<b>12</b>	<b>96</b>
<b>Natural Forces</b>	<b>7</b>	<b>12</b>	<b>84</b>
<b>Other Outside Force</b>	<b>0</b>	<b>12</b>	<b>0</b>
<b>Material (Bell &amp; Spigot)</b>	<b>6</b>	<b>12</b>	<b>72</b>
<b>Material (Mech)</b>	<b>4</b>	<b>12</b>	<b>48</b>
<b>Equipment Malfunction</b>	<b>0</b>	<b>12</b>	<b>0</b>
<b>Operation</b>	<b>3</b>	<b>12</b>	<b>36</b>

**LARGER THAN SIX-INCH CAST IRON, SUBURBAN AREAS, 20 PSIG**

<b>Threat</b>	<b>Likelihood</b>	<b>Consequence</b>	<b>Relative Risk</b>
<b>Corrosion</b>	<b>1</b>	<b>17</b>	<b>17</b>
<b>Excavation Damage</b>	<b>5</b>	<b>17</b>	<b>85</b>
<b>Natural Forces</b>	<b>0</b>	<b>17</b>	<b>0</b>
<b>Other Outside Force</b>	<b>0</b>	<b>17</b>	<b>0</b>
<b>Material (Bell &amp; Spigot)</b>	<b>3</b>	<b>17</b>	<b>51</b>
<b>Equipment Malfunction</b>	<b>0</b>	<b>17</b>	<b>0</b>
<b>Operation</b>	<b>1</b>	<b>17</b>	<b>17</b>

# Identify and Implement Measures to Address Risks

1. Determine and implement measures designed to reduce the risks from failure of the gas distribution pipeline
2. Measures must include an effective leak management program (unless all leaks are repaired when found)
3. Measures may also include additional or accelerated actions

# Measure Performance, Monitor Results, and Evaluate Effectiveness

1. Develop and monitor performance measures to evaluate the effectiveness of your program
2. Performance measures must include: (1) Number of hazardous leaks eliminated or repaired, categorized by cause; (2) Number of excavation damages; (3) Number of excavation tickets; (4) Total number of leaks either eliminated or repaired, categorized by cause; (5) Number of hazardous leaks either eliminated or repaired categorized by material; and (6) any additional measures the operator determines are needed to evaluate the effectiveness of the IM program
3. Look for trends in performance measures

# Periodic Evaluation and Improvement

1. Must conduct complete program re-evaluation, based on complexity of the system and changes in factors affecting the risk of failure, not to exceed every five years
2. Must consider the relevance of threats in one location to other locations
3. Must consider the results of the performance monitoring in these evaluations

# Report Results

1. Performance measures (1) through (4) must be reported annually on F 7100.1-1
2. Performance measure (5) – Number of hazardous leaks either eliminated or repaired categorized by material - must be monitored but is not required to be reported according to final rule
3. Must maintain records demonstrating compliance of the DIMP rule for at least 10 years, including copies of superseded plans

# Written DIMP Plan for Master meter and small LPG Operators

1. Requires all seven elements of the operator plan, but should reflect the relative simplicity of master meter and small LPG systems
2. Must monitor (but does not have to report) the number of leaks eliminated or repaired on pipelines and their cause
3. Must keep IM plans and records a minimum of 10 years, must keep threat identification support, location and material of all piping and appurtenances installed after effective date of IM program, plus location and material of piping and appurtenances installed before effective date of IM program to the extent known

# Resources

1. Ohio Gas Association
2. GPTC Guide Appendix G-192-8 (to be updated)
3. APGA/SIF S.H.R.I.M.P. (to be updated)
4. MEA Plan Preparation Aid (to be updated)
5. UTI
6. PHMSA FAQ's, Small Operator Guide (to be released)
7. GTI
8. PUCO Gas Pipeline Safety Division

? Questions ?