Observations from DIMP Reviews

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Gas Distribution Threat Categories *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

Gas Distribution Threat Categories *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

PHMSA Form 24
Inspection Form

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1005	**Issues Identified in previous Integrity Management Inspection(s)**				
1	* - If not satisfactory, insert appropriate code section(s)	Have all issues raised in previous DIMP inspections been satisfactorily addressed? Provide comments below.	☐	☐	☐	☐
Inspector Comments						
	192.1007(a)	**Knowledge of the system**				
2	.1007 (a)(3)	Is the operator collecting the missing or incomplete system information and data needed to fill knowledge gaps to assess existing and potential threats?	☐	☐	☐	☐
Inspector Comments						
3	.1007 (a)(3)	Is the operator collecting the missing or incomplete system information and data using the procedures prescribed in its DIMP plan?	☐	☐	☐	☐

PHMSA Form 23 DIMP MM Inspection Form

PHMSA Form 23 Question Set (IA Equivalent)
Distribution Integrity Management Program (MMLPGIM) Inspection Form

Master Meter and Small LPG Distribution Integrity Management - Plan Implementation

1. Plan Implementation - Implement Date (detail) *Was the plan written and implemented per the requirement of 192.1015 by 08/02/2011?* (MMLPGIM.QA.PLANIMPLEMENT.P) (detail)

192.1015(a)	Sat+	Sat	Concern	Unsat	NA	NC

Notes

Master Meter and Small LPG Distribution Integrity Management - Knowledge of the System

1. System Knowledge - Information Considered (detail) *Does the plan include an explanation of the mechanisms or procedures to address how the operator will demonstrate knowledge of its pipeline which, to the extent known, should include the approximate location and material of its pipeline?* (MMLPGIM.RA.INFORMATION.P) (detail)

192.1015(b)(1)	Sat+	Sat	Concern	Unsat	NA	NC

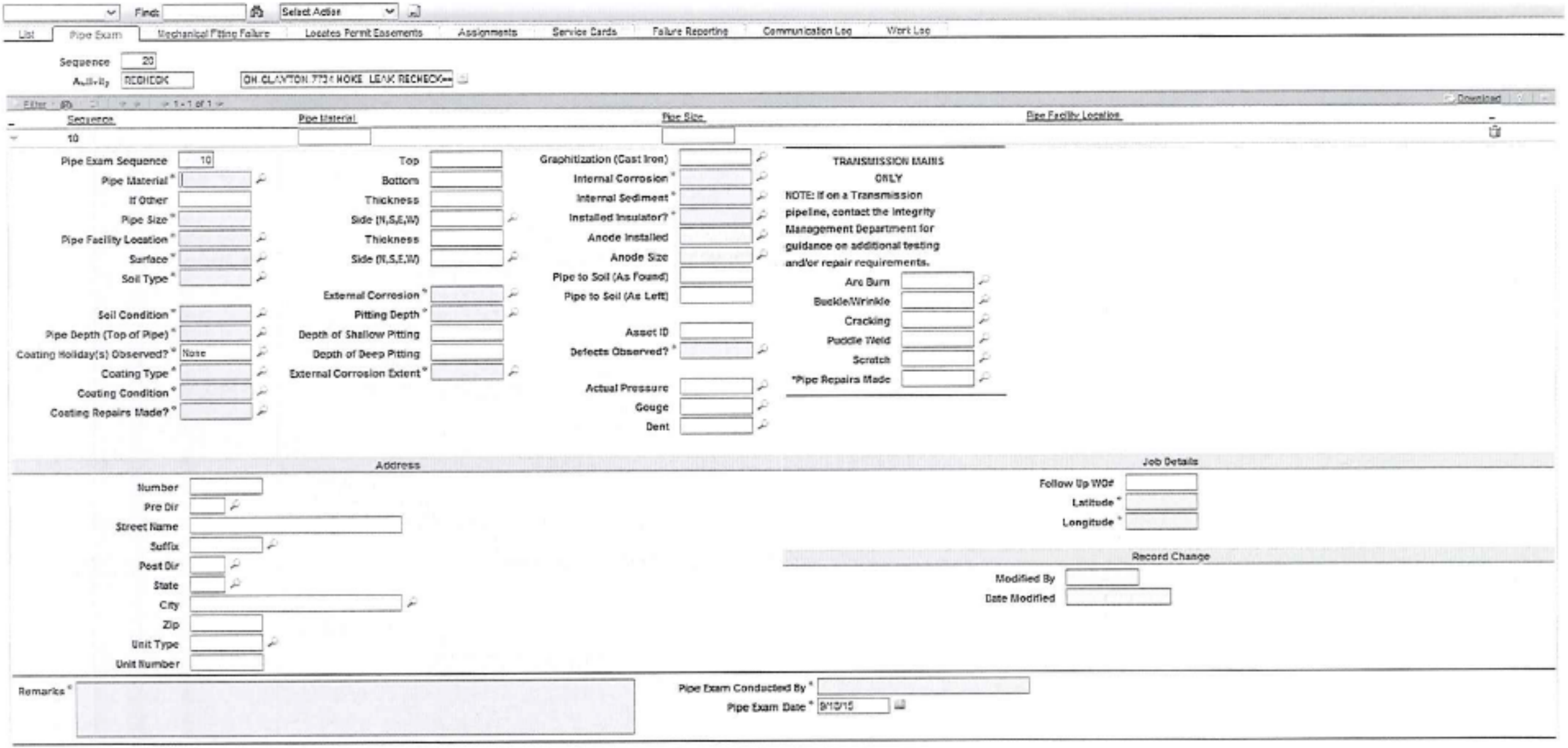
NEED A WRITTEN PLAN:
IT CAN BE IN THE DIMP
OR
O&M PROCEDURES

Have a written procedure. A step by step written procedure on what the man in the trench should do (192.1007.A).

When an excavation is opened and the pipe exposed (192.1007.3), following the operator's current pipeline exposure procedures:

1. Inspect the pipeline to determine pipeline type. Metal, plastic, fiberglass?
2. Clean off the pipeline with the appropriate materials for the type of pipeline.
3. Inspect the pipeline and fill out the standard company pipeline exam form
   (Every company needs one of these to make sure all needed data is collected)

PIPE EXAM FORM



TOP 5 THREATS - MEASURES TO REDUCE RISK – PERFORMANCE MEASURES
Current Measures to Reduce Risk In Place

Rank	Primary Threat Category*	Threat Subcategory, as appropriate	Measure to Reduce Risk	Performance Measure
1.	Excavation Damage	3rd Party Damage	Conduct enhanced awareness education	Keep copy of Public Awareness Notices sent each year, typically 3 per year.
	Comments	Operator sends out the Public Awareness Notices at least three times each year.		
2.	Corrosion	Atmospheric Corrosion	Increase frequency of leak surveys	Review Leakage Summary Section 8 of IMP
	Comments	Operator performs leak surveys annually and documents results in section 8 of the IMP. Operator plans on painting all above ground pipelines and fixtures this year.		
3.	Corrosion	External Corrosion	Increase frequency of leak surveys	Review Leakage Summary Section 8 of IMP
	Comments	Operator performs leak surveys annually and documents results in section 8 of the IMP.		
4.	Corrosion	Internal Corrosion	Increase frequency of leak surveys	Review Leakage Summary Section 8 of IMP
	Comments	Operator performs leak surveys annually and documents results in section 8 of the IMP.		
5.	Natural Forces	Weather	Increase frequency of leak surveys	Review Leakage Summary Section 8 of IMP
	Comments	Operator performs leak surveys annually and documents results in section 8 of the IMP.		
* Corrosion, Natural Forces, Excavation Damage, Other Outside Force Damage, Material or Weld, Equipment Failure, Incorrect Operation, Other Concerns				