



DIMP

Today's the day. Every distribution operator should have "developed and implemented" a distribution integrity management plan no later than August 2, 2011.

Now that we all have gone through the process of developing these plans, what have we learned? One thing we have learned is that Minnesota Municipal gas operators run good systems. There have not been a whole lot of threats identified in the DIM plans I've seen. Of course in some cases excavation damage is a threat, but in many of the towns I work with leak reports and damage investigation reports don't indicate very much excavation damage at all. Some towns have had zero line hits over the last 5 years. That is exceptionally good.

Other threats that were identified in a number of locations include the presence of problem materials, especially compression couplings on plastic pipe. These are specifically called out in SHRIMP so if you know they exist in your system they will be listed as a threat. However, once again, in almost all cases there is very little failure history associated with these couplings. Also, there have been some towns that have replaced substantial segments of their systems and in the process greatly reduced or eliminated the number of compression couplings on plastic pipe. A few locations have some small amount of DuPont "Aldyl A" PE pipe, which can be identified as a threat if it is pre-1973 production. At the risk of sounding like a broken record, once more there is not a failure history associated with this pipe in MMUA towns.

Threats with little or no failure history probably only need to be monitored. The "[Frequently Asked Questions](#)" page that PHMSA has posted regarding DIMP answers the question "Why not simply require operators of gas distribution pipelines to replace old pipe?" The gist of the answer explains that the purpose of DIMP is for operators to analyze their systems, identify hazards, and take action to mitigate those hazards. PHMSA states: "Simply because a pipeline is old, does not mean it is a risk to public safety." We are looking for problems, not evaluating the age of a system.

What will happen next? At some point in the near future, we will meet with regulators who will be inspecting our DIM Plans. Quoting again from the PHMSA FAQ site:

"Inspectors will review the IM plan for quality and completeness and **ensure that operators are doing what their plan says**; and then inspect to see if their plan is effective. **The procedures and records will be reviewed to verify that the operator performed them as written** and in compliance with required dates. Enforcement will be consistent with current practice by the jurisdictional agencies."

To me, that means we haven't finished something, rather, we are just starting. Your plans commit you to doing a variety of things, depending on the operator and any threats that were identified. These threats and any associated additional actions are listed in your plan. Expect to be asked to produce records showing how you accomplished the things you said you would do.

Now to the biggest lesson I learned through this process, so far. Really it was nothing new, but rather reinforced something we all know. Complete and accurate records are essential in the operation of your distribution system. DIMP is one more cross reference on the accuracy of the records you keep. In populating the data that the SHRIMP program required, it is easy to see when things don't make sense. Your record keeping system needs to become like a double entry accounting system-there has to be some way to balance everything that is entered. When a gas leak is investigated, you need to be able to answer the following questions:

- Is it on the distribution system or not?
- If on the distribution system, was it classified?
- Hazardous or not?
- What is the cause of the leak?
- When was it fixed?
- Required pressure tests done?
- Required maps and records complete?
- Damage investigation or failure investigation done if required?

All of you need to start doing something that not very many have been doing, as far as I know. One required performance measure that may be new is the number of excavation damages. All of you have tracked line hits and leaks in the past, but DIMP defines "excavation damage" as "impact that results in the need to repair or replace an underground facility...including, but not limited to, the protective coating...". There are a number of other things listed, but if you have steel pipe, coating damage must now be tracked for reporting in SHRIMP and on the annual report. I will discuss this further in future months, but for now, **if you suspect something could be excavation damage, EVEN IF it does not leak, track it.**

Please contact me if you have questions, and I will keep you updated on any news I hear regarding DIMP.

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