



DIMP Final Rule Published

Today, Friday, December 4, 2009, PHMSA published the Final Distribution Integrity Management rule in the Federal Register.

The notice that was published contains 32 pages of information. However, the changes to code, which involve adding a Subpart P to Part 192, take up only about two of these pages. The rest discusses PHMSA's response to comments received on the proposed rule.

I haven't read the entire thing in depth, but here is a summary of what Distribution Integrity Management will mean, point by point:

- 192.383 is amended to require the installation of excess flow valves in new or replaced service lines serving a single family residence after February 2, 2010, unless the installation is not practical because of the operating pressure, gas contaminants, or a fitting meeting standards is not manufactured. I believe all of you are already complying with this requirement.
- 192.1001 will contain definitions of *excavation damage*, *hazardous leak*, *integrity management plan*, *integrity management program*, and *small LP gas operator*.
- 192.1003 specifies gas distribution operators must comply with 192.1005 through 192.1013.
- 192.1005 requires that gas distribution operators must develop and implement a written integrity management plan no later than August 2, 2011.
- 192.1007 defines what the integrity management plan must include. In general, it says that operators must know their system, including information that will allow for risk ranking threats to the pipeline integrity, periodically review the plan, gather information about the system during the course of normal activities, and record information about new construction. Existing threats must be identified, and evaluated to rank the risk they pose. The operator must also decide what actions must be taken because of these risks. Leaks on the system must be tracked and reported to allow evaluation of the effectiveness of the program. Periodically, the program must be reviewed to see if the risk ranking may have changed and if the program is effective. A complete program re-evaluation is required at least every 5 years. Data on leaks, excavation damages, and number of locate tickets will be required to be added to the annual report.

- 192.1009 requires operators to report information related to failure of compression couplings. This will be done as part of the annual report.
- 192.1011 specifies that you have to keep records demonstrating compliance with Subpart P for at least 10 years, including IM plans that have been amended.
- 192.1013 describes the process that will be followed when an operator proposes to reduce the frequency of a required inspection. I suspect it will be difficult to obtain permission to reduce inspection frequency, at least initially.
- 192.1015 deals with requirements for master meter operators and small LP gas operators, so won't concern us.

My first impression is that this will not have a huge negative impact on municipal operators. One section of the proposed rule that had many people concerned was the requirement of a section on "Assuring Individual Performance", or performance through people. This has been removed from the final rule. PHMSA agreed that existing OQ requirements, drug and alcohol testing requirements, and damage prevention and public awareness efforts provide for adequate safety. I believe that is a good thing for us. However, inappropriate operation will still need to be evaluated as a possible threat to the system.

Some of the positive points in the final rule include: no requirement to report failures on plastic pipe, no "performance through people" requirement, clarification of definitions of some words used in the plans, and no requirement for submitting IM plans to a clearinghouse.

I expect we will begin developing plans sometime in 2010. This will take some time, but in the long run the rule will result in a bit more administrative burden and possibly some additional work gathering information on pipe and fittings when they are exposed in the normal course of work. I don't see it creating a huge new workload operationally. I'll keep you posted as we learn more about this new rule and the actions that will be needed to comply. Please contact me if you have questions or comments.

Contact information:

Jim Ramnes

MMUA Gas Circuit Rider

612-801-1768

Email me at jramnes@mmua.org