



Ames MEA Conference and DIMP

I attended this year's Gas Distribution Conference put on by the MEA in early August. There weren't a lot of new issues brought up at the conference. Probably the one with the most potential impact on us was the upcoming release of the final DIMP rule. PHMSA representatives led us to believe that we can expect to see a final rule published soon, likely sometime in September. We have heard that before, but they sounded like they meant it this time.

A final rule will allow APGA to complete work on the SHRIMP tool as an option to prepare a DIMP plan. We will have 18 months from the date the rule is published to develop and implement a plan. I'll keep you posted on further developments regarding SHRIMP.

No doubt the publication of a final rule will answer some of our questions, while creating some new ones at the same time. There was a consistent message in the questions asked of PHMSA representatives at the conference, saying that pipeline operators need clear direction on what regulators expect if we are to have any chance of complying with the new rule.

There were a couple of statements made that might give a hint of what to expect from the final rule. First, there is a good chance that the "Prevention through people" portion of the rule will not make the final cut. In my opinion this would be a good thing. If PHMSA wants to do more to regulate training or qualification of operating personnel, they should do it through the existing OQ section of code.

Second, the requirement for reporting plastic pipe failures to a central database administered by the Feds is likely to be included. Currently, this is reported to an industry group on a voluntary basis but PHMSA has no access to the data and they want to change that.

I continue to believe that the main impact of this on Minnesota Gas Municipals will be increased record keeping, rather than additional operational requirements. From everything I have been able to gather, you are taking good care of your distribution systems. Everyone is already installing EFV's where possible so a requirement to do this will have no effect.

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Code Corner

This month we will review a couple of the requirements of 192.614, the section that requires you to have a Damage Prevention Program, and some things you might want to think about as you work with excavators around your gas distribution system.

Code contains some requirements for pipeline operators that other underground facility owners don't have to comply with. For example, we have to follow Damage Prevention Programs that not only provide for the locating and marking of the underground pipelines we operate, but also ensure that we will inspect pipelines that we "(have) reason to believe could be damaged by excavation activities." This inspection has to be done "as frequently as necessary during and after the activities to verify the integrity of the pipeline". One example I have seen in some O&M's of compliance with this involve leak surveying areas where excavation activity took place prior to freeze up. You may want to consider this.

All of you know that if code requires you to do something, you have to be able to show records that demonstrate you did it. In this case, one way of doing that is to keep a copy of the locate ticket and record visits to the excavation site for remarking or inspecting the pipe for damage and correct support and backfill. Of course, the excavator is supposed to be doing those things, but as a pipeline operator you need to monitor to ensure excavators are following these requirements.

NACE Course in November

There will be a NACE International Basic Corrosion course offered in Vadnais Heights the week of November 16.

This course "provides a basic but thorough review of causes of corrosion and the methods by which it can be identified, monitored, and controlled."

NACE requires no previous training in corrosion for attendees, but a basic understanding of science and chemistry is recommended.

Successful completion of this course is part of the process of getting a NACE Corrosion Technician certification.

If you have questions, Scott Osborne in New Ulm is active in the Twin Cities NACE Section and would be a good source of information. Registration information is available at nace.org under the education tab. Scott can be contacted at scott.osborne@ci.new-ulm.mn.us.