



# DISTRIBUTION INTEGRITY MANAGEMENT PROGRAM

July 2024



# PRESENTATION SCHEDULE

# Agenda



## What you can expect:

- DIMP Overview
- Inspections & Audits
- National Data
- Information Gathering
- Improvement
- Current Regulatory Topics
- Final Thoughts
- Question & Answer







# DIMP OVERVIEW

# DIMP Timeline



The Distribution Integrity Management Program becomes law.



December 2009

August 2011



Operators MUST implement the Distribution Integrity Management Program.

Raising awareness at the 2024 Pipeline Safety Conference



July 2024



# INSPECTIONS & AUDITS



# Inspections & Audits



1

## Scheduling

- Audit Cycle
- Communications

2

## Pre-audit

- Review Procedures

3

## On The Day

- Have Records Available
- Not a "Gotcha" Inspection

4

## Post-Audit

- Finalize Report
- Review Potential AOC's & NOPV's
- Draft & Send Letter

5

## Moving Forward

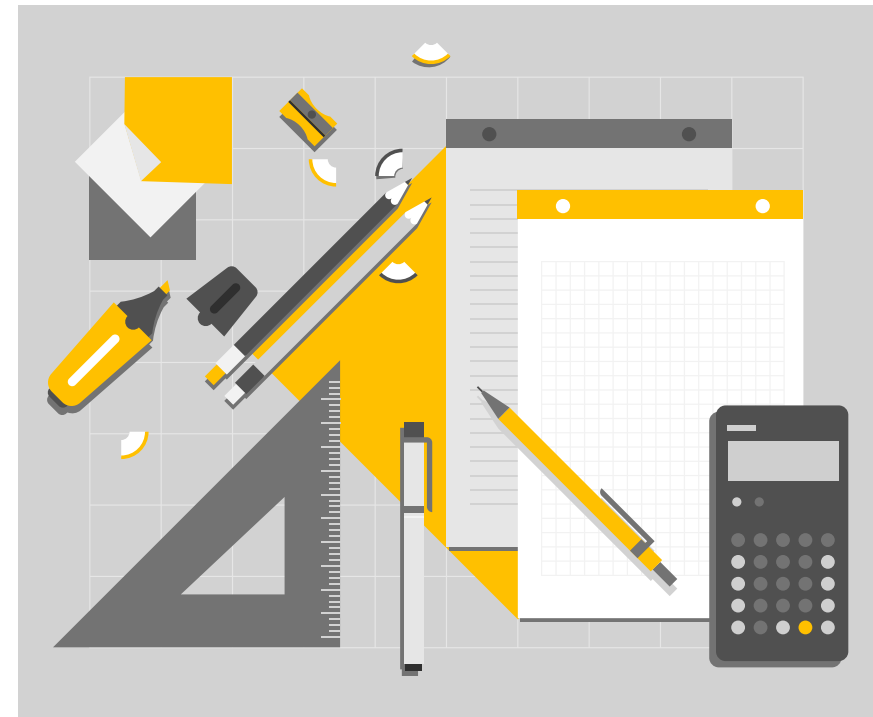
- Follow-up Communications

# Inspections & Audits



## Audits

- Initial Integrity Management
- Integrity Management Implementation
- Procedures
- Records







# Integrity Inspection Forms

## Forms

- Internal & External
- PHMSA Form 22  
*Initial Integrity Management*
- PHMSA Form 24  
*Integrity Management Implementation*
- Indiana Form 11  
*TIMP Implementation*
- PHMSA Form 18  
*Hazardous Liquids Integrity Management*



**The appropriate form will be sent to you prior to your audit.**

# DIMP Inspection



## Inspection Observations

- Continuous improvement
- DIMP was designed to be a performance-based regulation
- More implementation = reduced risks
- Vacancies and operation knowledge

# Future Form(s)



## Future Form

- NAPSIR & PHMSA are looking to incorporate a field investigation/audit to verify the operator's DIMP implementation into the inspection programs with a new form.





# National Data

# National Data

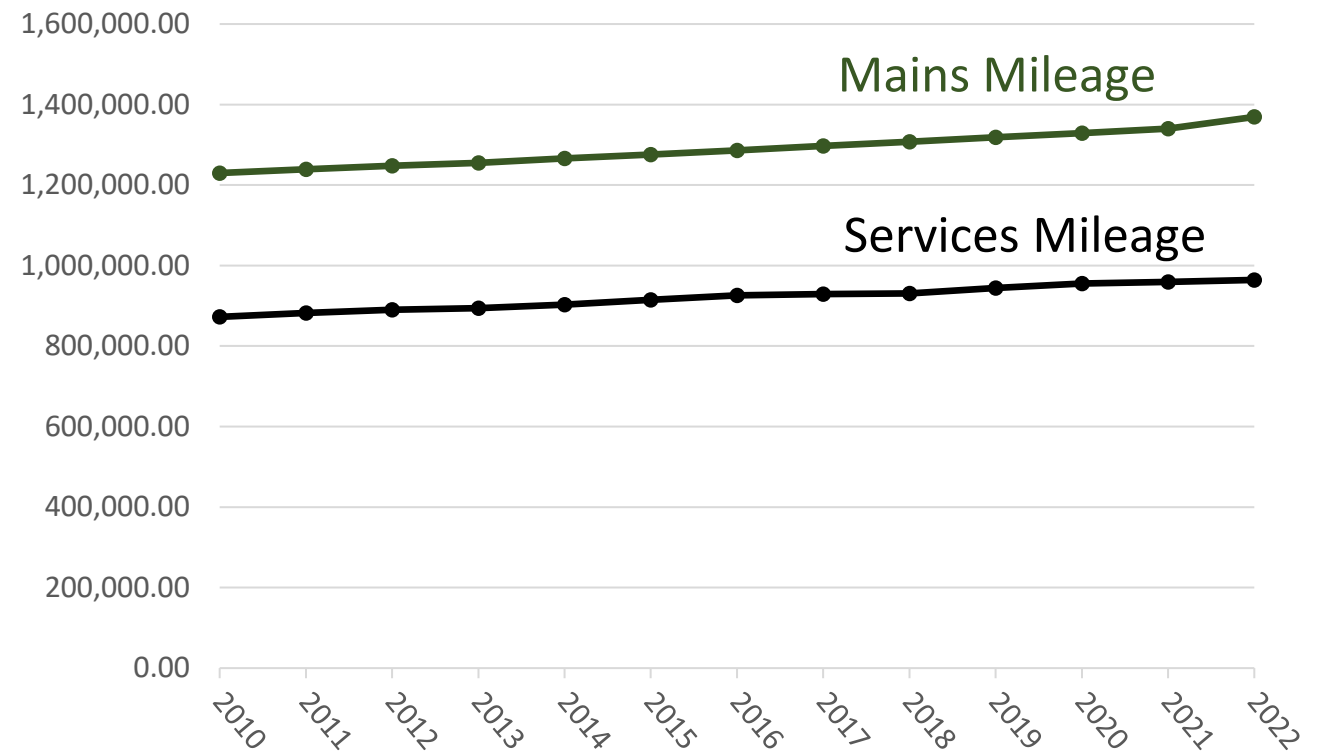


## Gas Distribution Mileage

*Annual Reports 2022*

Main		
Pipe Material	Total Miles	% of Miles
Steel	511,569.7	37.4%
Plastic	839,147.7	61.29%
Other Materials	941.6	0.1%

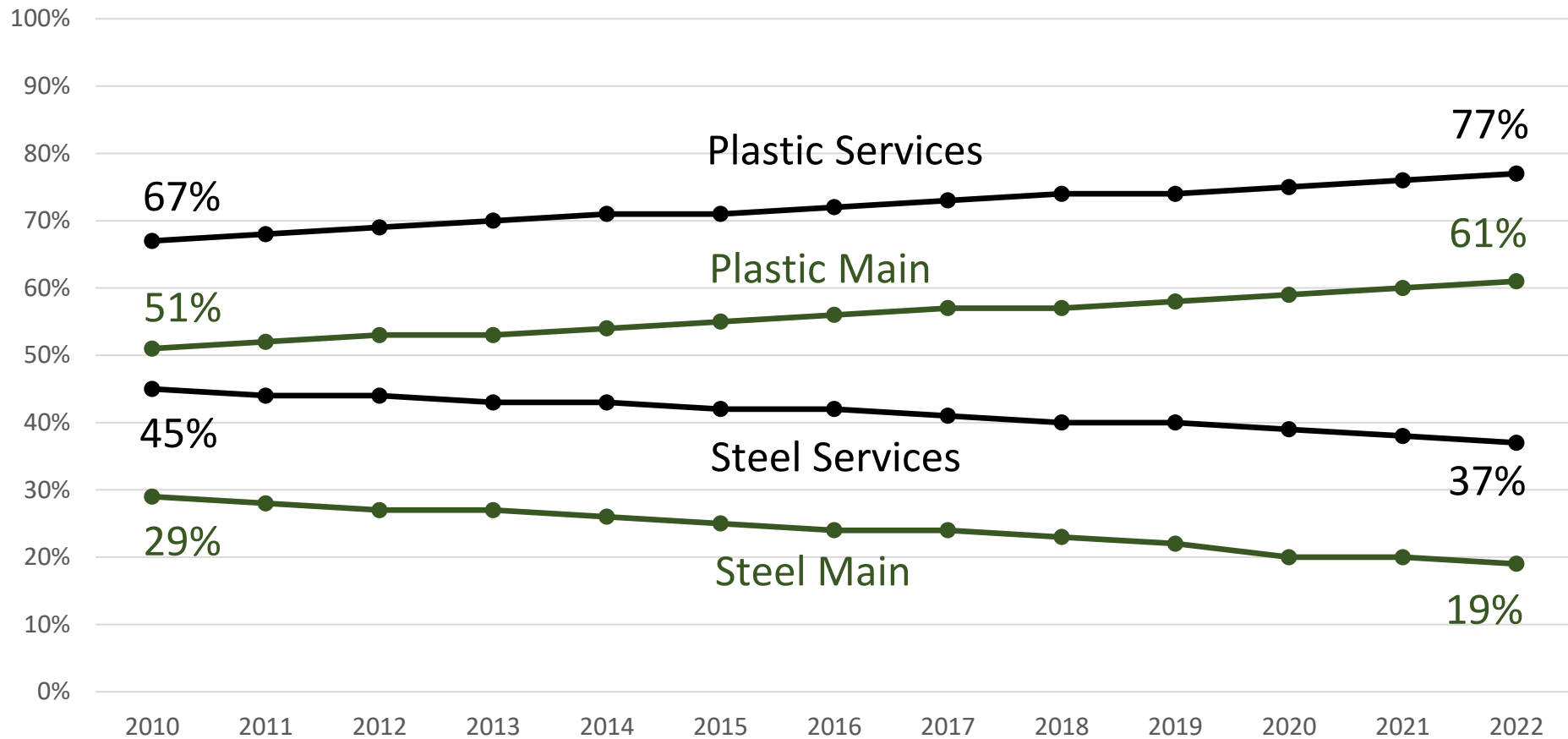
Services		
Pipe Material	Total Miles	% of Miles
Steel	188,163.2	19.5%
Plastic	742,933.6	77.0%
Other Materials	25,587.2	2.7%



# National Data



## Steel vs. Plastic - Percentage





# National Data



## Top 10 States based on 2022 Annual Reports

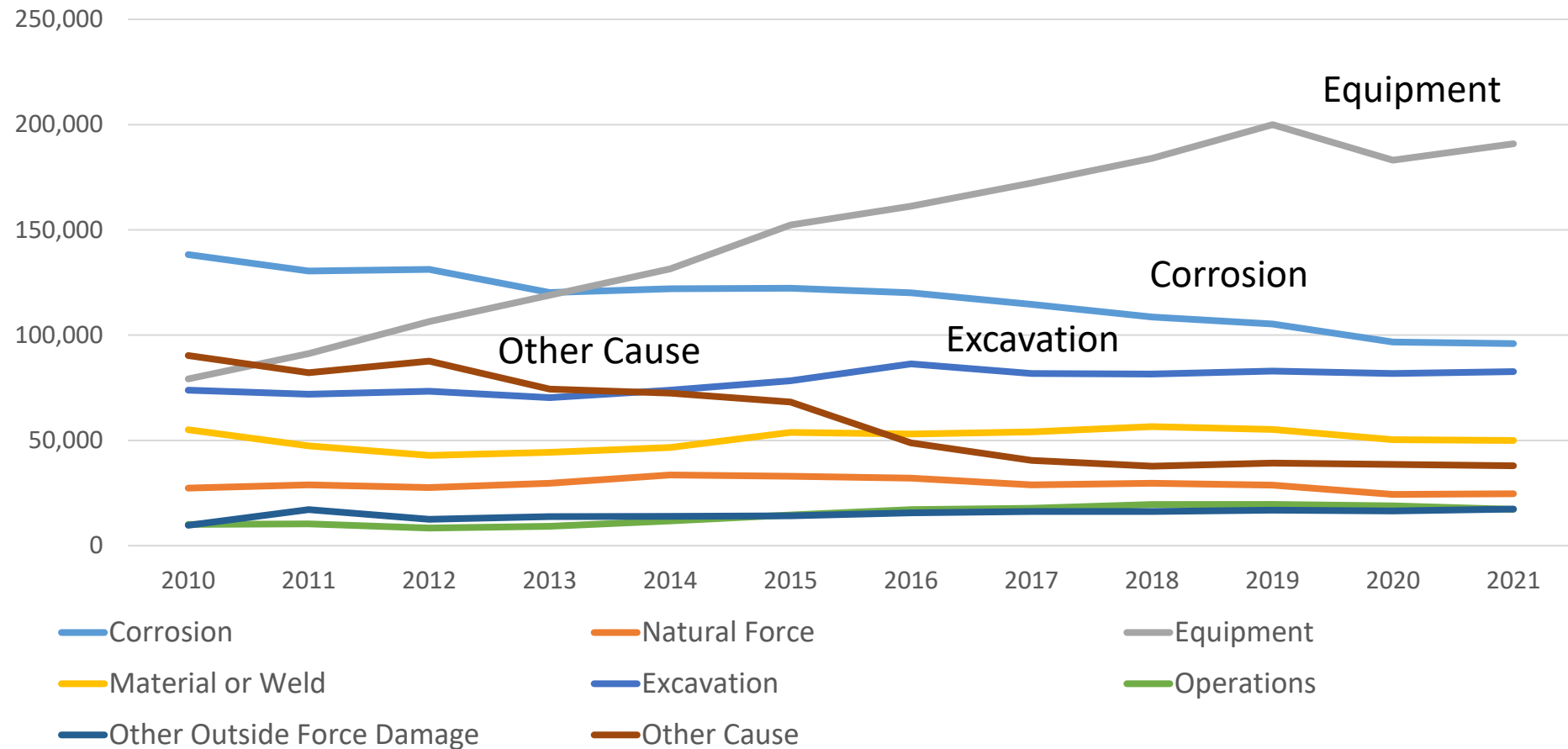
Mains			
Total Miles	Percent Steel / Mile	Percent Plastic / Mile	Percent Leaks / Mile
TX	IL	NV	DC
CA	NE	AK	MA
IL	LA	ME	WV
MI	OR	DE	MD
OH	MS	VT	RI
NY	CA	UT	PA
PA	OH	MN	NY
GA	KS	WI	CT
IN	KY	MT	VA
TN	MO	VA	TX

Services			
Total Miles	Percent Steel / Mile	Percent Plastic / Mile	Percent Leaks / Mile
CA	LA	ME	AR
MI	MT	MT	TX
TX	WY	NV	HI
IL	MS	MN	IL
OH	AL	VT	LA
GA	NM	AK	MS
NY	CA	KS	OK
IN	HI	AZ	WV
NJ	NE	VA	FL
WI	OK	WI	CA

# National Data



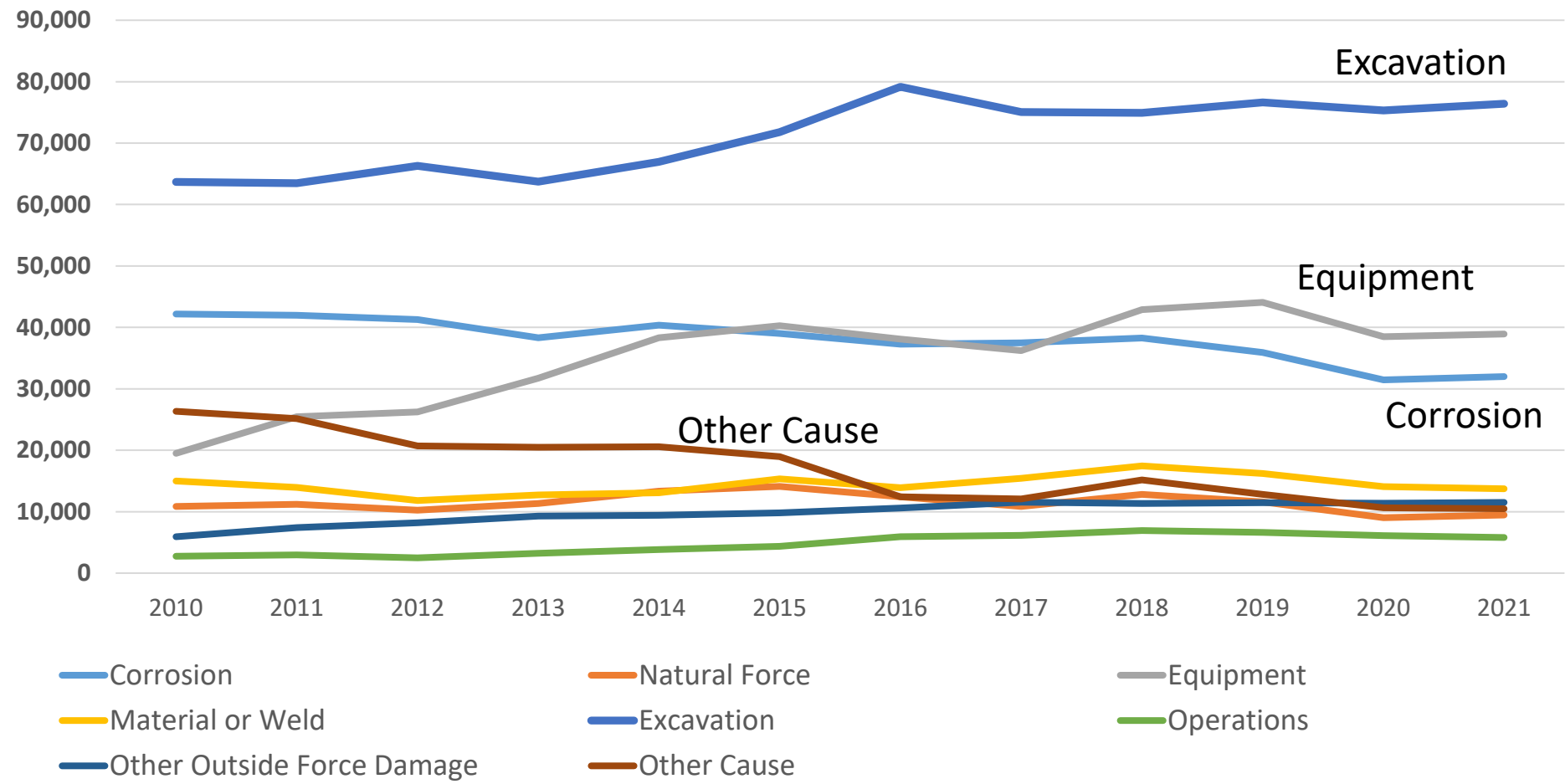
## Leaks by Cause





# National Data

## Hazardous Leaks by Cause Annual Report

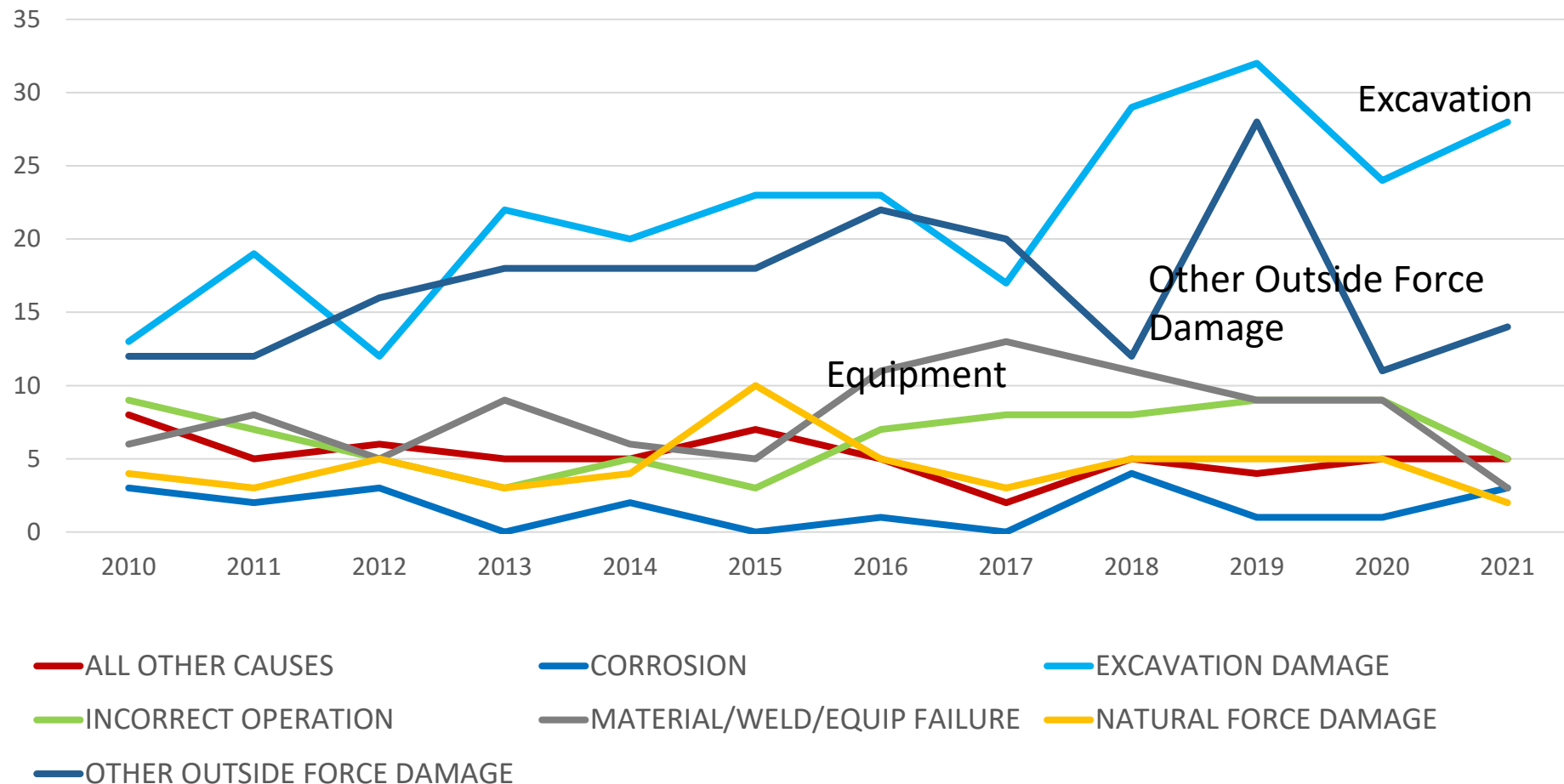




# National Data



## Causes of Significant Incidents



# National Data



## Top 10 Codes Cited for UNSAT

Cited Code	Count	
<b>192.605(a)</b>	110	Procedures
<b>192.353(a)</b>	91	Meters and Regulators - Location
<b>192.616(c)</b>	80	Public Awareness
<b>192.481(b)</b>	75	Monitoring Atmospheric Corrosion Control
<b>192.147(a)</b>	68	Flanges and Flange Accessories
<b>192.355(b)(2)</b>	54	Meters and Regulators - Protection
<b>192.491(c)</b>	47	Corrosion Control Records
<b>192.615(b)(2)</b>	46	Emergency Plans
<b>192.357(a)</b>	40	Meters and Regulators - Installation
<b>192.455(a)</b>	40	External Corrosion Control



# INFORMATION GATHERING



# Information Gathering



## What information do YOU need to gather?

- Construction
  - Materials
- Surveys
- Threats
- System knowledge
- Reduce risk
  - Plans & procedures
  - Field





**What threats does your  
plan consider?**

# Threats



## Identify Threats

- Trenchless technology used in the area
- Future utility/road improvement projects
- System discovery
- Structures built over/near pipeline
- Overpressurization events
- Damage not resulting in a leak
- Old/outdated procedures







**How does your plan  
reduce risk?**

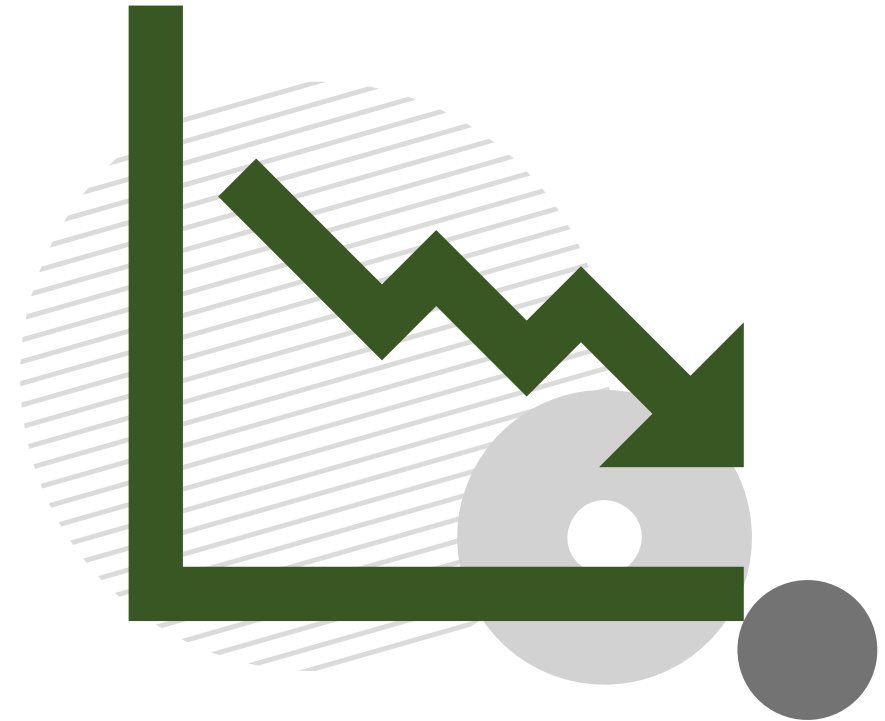


# Risk



## Reducing Risk

- Eliminating systems
  - Bare steel
  - Cast iron
  - Low pressure
- Cathodic protection
- Increased targeted patrols
- Public awareness / damage prevention
- Operator qualification / covered task efficiency review





# IMPROVEMENT



# Measuring Performance



## How are you measuring performance?

- Baselines
- Develop and monitor performance measures
- Operators may identify a SINGLE performance measure to evaluate the effectiveness of multiple risk control measures.



Each measure implemented to reduce risk **MUST** have a performance measure to establish to monitor effectiveness.



# Evaluation, Improvement & Reporting

## Moving Forward

- Conducting periodic evaluations
- Internal communication
- Pipeline replacement programs
- Re-evaluations

## Annual Reports

- Ensure that your leak causes align with your incident reports.





# CURRENT REGULATORY TOPICS

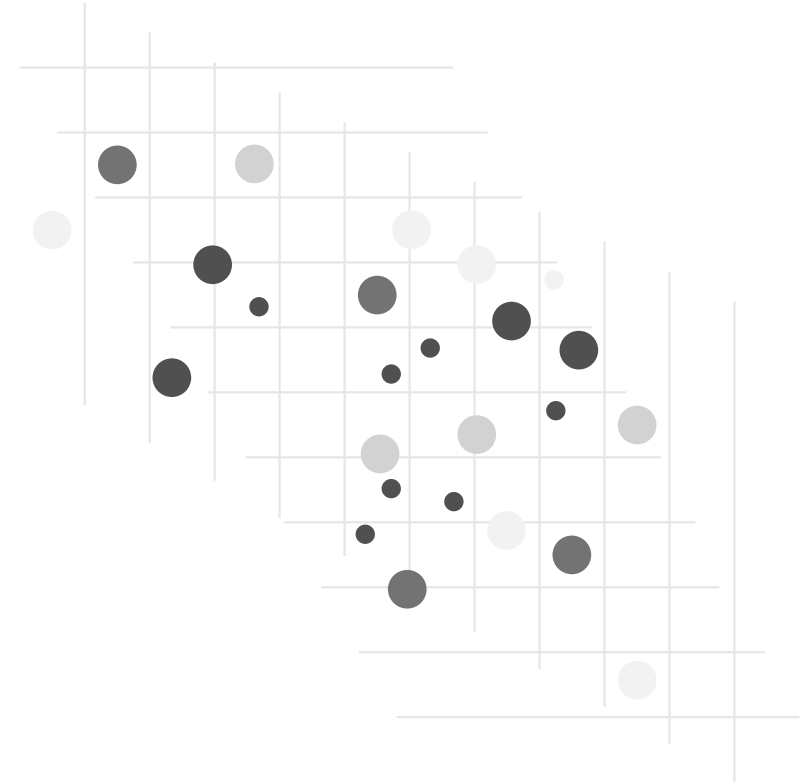


# Current Regulatory Topics



## Technology and the future

- Work Management Systems
  - Are you maintaining compliance?
- New Technologies
  - *Pacarro*





# FINAL THOUGHTS

# Takeaways



## What should you remember?

- *Everything!*
- DIMP programs need to mature
- Continuously gain system knowledge
- QA/QC & data integrity







**Q&A**



# THANK YOU

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