

Distribution Integrity Management Program (DIMP)

Inspection Form

For Operators of Gas Distribution Systems

For Requirements of 192.1005 – 192.1011

Version 9/23/2011

This inspection form is for the evaluation of a gas distribution integrity management program for all operators of gas distribution except operators of master meter or small liquefied petroleum gas (LPG) systems. The form contains questions related to specific regulatory requirements and questions which are strictly for informational purposes. The questions which are related to specific regulatory requirements are preceded by the rule section number which prescribes the applicable code citation for the question. The cell preceding informational questions states “information only”.

S/Y stands for “Satisfactory” or “Yes”, U/N stands for “Unsatisfactory” or “No”, N/A stands for “Not Applicable”, and N/C stands for “Not Checked”. If an item is marked U/N, N/A, or N/C, an explanation must be included in the comments section.

Some inspection questions contain examples to further clarify the intent of the question. For example, question 5 asks, “Do the written procedures require the consideration of information gained from past design, operations, and maintenance (e.g. O&M activities, field surveys, One-Call system information, excavation damage, etc.)?” The list following “e.g.” is not meant to be all inclusive or that all the items are required. Some of the items may not be applicable to an individual operator’s system.

Some States require the operator to notify and send the State regulatory authority any changes to operator’s plans and procedures. Operators in these states should also notify and send revisions of the DIMP plan to the State regulatory authority.

Operator Contact and System Information — Operator Information:

Name of Operator (legal entity):	City of Buckley
PHMSA Operator ID(s) Included in this Inspection:	1848
Type of Operator:	<input type="checkbox"/> Investor Owned <input checked="" type="checkbox"/> Municipal <input type="checkbox"/> Private <input type="checkbox"/> LPG <input type="checkbox"/> Other (e.g. cooperative)
States(s) included in this inspection:	Washington
Headquarters Address:	933 Main St, Buckley, WA 98321
Company Contact:	Brian Burbank, Gas Lead
Phone Number:	Off (360) 829-1921, Cell (253) 261-6754
Email:	bburbank@cityofbuckley.com
Date(s) of Inspection:	Click here to enter a date. TO Click here to enter a date. 6/25/2013
Date of Report:	Click here to enter a date.

Persons Interviewed:

Persons Interviewed <i>(List the DIMP Administrator as the first contact)</i>	Title	Phone Number	Email
Brian Burbank	Gas Lead	253-261-6754	bburbank@cityofbuckley.com
John Dansby	Public Works Supervisor	253-261-9826	jdansby@cityofbuckley.com

State or Federal Representatives:

Inspector Name & Agency	Phone Number	Email
Scott Rukke	360-664-1241	srukke@comcast.net

Inspector Comments (optional): This was a technical assistance visit.

192.1005 What must a gas distribution operator do to implement this subpart?						
Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
1	.1005	Was the plan written and implemented per the requirement of 192.1005 by 08/02/2011? <u>OR</u> For a gas system put into service or acquired after 08/02/2011, was a plan written and implemented prior to beginning of operation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		Implemented on 08/02/2011 but lacking procedures required in 192.1007. . GUIDELINES - The DIMP plan does not contain the necessary procedures to demonstrate that the plan was written and is being implemented.				
2	Information Only	Were commercially available product(s)/templates used in the development of the operator's written integrity management plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		Fully <input checked="" type="checkbox"/>	Partially <input type="checkbox"/>	Not at all <input type="checkbox"/>		
		Commercial product(s)/templates name if used: SHRIMP				
Inspector's Comments						
3	Information Only	Does the operator's plan assign responsibility, including titles and positions, of those accountable for developing and implementing required actions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		Section 11.1 assigns tasks and titles to the gas personnel in charge of plan implementation and development.				
4	.1007(a)(1)	Do the written procedures identify or reference the appropriate sources used to determine the following characteristics necessary to assess the threats and risks to the integrity of the pipeline: <ul style="list-style-type: none"> Design (e.g. type of construction, inserted pipe, rehabilitated pipe method, materials, sizes, dates of installation, mains and services, etc.)? Operating Conditions (e.g. pressure, gas quality, etc.)? Operating Environmental Factors (e.g. corrosive soil conditions, frost heave, land subsidence, landslides, washouts, snow damage, external heat sources, business districts, wall-to-wall paving, population density, difficult to evacuate facilities, valve placement, etc.)? 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		Buckley has found steel wrapped pipe installed in pvc conduit which shields cathodic protection. This installation method is not identified in its DIMP Plan.				

192.1007(a) Knowledge of the System

Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
5	.1007(a)(2)	Do the written procedures require the consideration of information gained from past design, operations, and maintenance (e.g. O&M activities, field surveys, One-Call system information, excavation damage, etc.)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		See above				
6	Information Only	Do the written procedures indicate if the information was obtained from electronic records, paper records, or subject matter expert knowledge (select all which apply)?				
		Electronic <input type="checkbox"/>	Paper <input type="checkbox"/>	SME <input type="checkbox"/>		
Inspector's Comments						
7	.1007(a)(3)	Does the plan contain written procedures to identify additional information that is needed to fill gaps due to missing, inaccurate, or incomplete records?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
8	.1007(a)(3)	Does the plan list the additional information needed to fill gaps due to missing, inaccurate, or incomplete records?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
9	.1007(a)(3)	Do the written procedures specify the means to collect the additional information needed to fill gaps due to missing, inaccurate, or incomplete records (e.g., O&M activities, field surveys, One-Call System, etc.)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
10	.1007(a)(5)	Do the written procedures require the capture and retention of data on any new pipeline installed?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		Modify Chapter 3 to include type of material and type of fittings etc.				
11	.1007(a)(5)	Does the data required for capture and retention include, at a minimum, the location where the new pipeline is installed and the material from which it is constructed?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
12	.1007(a)	Does the documentation provided by the operator demonstrate implementation of the element "Knowledge of the System"?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
13	.1007(a)	Has the operator demonstrated an understanding of its system?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

PHMSA Form 22 - Gas Distribution System DIMP Inspection, September 23, 2011, Rev 0

Inspector's Comments	The DIMP program is incomplete. So it is difficult to determine if the system knowledge is there. 8 years experience between 3 employees.
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192.1007(b) Identify Threats

Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
14	.1007(b)	In identifying threats, do the written procedures include consideration of the following categories of threats to each gas distribution pipeline? <ul style="list-style-type: none"> • Corrosion • Natural Forces • Excavation Damage • Other Outside Force Damage • Material or Welds • Equipment Failure • Incorrect Operation • Other Concerns 	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Inspector's Comments						
15	.1007(b)	Did the operator consider the information that was reasonably available to identify existing and potential threats?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
16	Information Only	Does the plan subdivide the primary threats into subcategories to identify existing and potential threats?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		Yes, each category, where appropriate is subdivided. Example is corrosion which is broken into internal, external etc.				
17	.1007(b)	In identifying threats did the information considered include any of the following? <ul style="list-style-type: none"> • Incident and leak history <input checked="" type="checkbox"/> yes <input type="checkbox"/> no • Corrosion control records <input checked="" type="checkbox"/> yes <input type="checkbox"/> no • Continuing surveillance records <input checked="" type="checkbox"/> yes <input type="checkbox"/> no • Patrolling records <input checked="" type="checkbox"/> yes <input type="checkbox"/> no • Maintenance history <input checked="" type="checkbox"/> yes <input type="checkbox"/> no • Excavation damage experience <input checked="" type="checkbox"/> yes <input type="checkbox"/> no • Other – Describe Materials such as other, i.e., not steel or PE _____ <input checked="" type="checkbox"/> yes <input type="checkbox"/> no 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
18	Information Only	Does the plan categorize primary threats as either "system-wide" or "localized"?				
		All System-wide <input checked="" type="checkbox"/>	All Localized <input type="checkbox"/>	Some of Both <input type="checkbox"/>	Not Identified <input type="checkbox"/>	
Inspector's Comments		All threats are considered system wide.				
19	Information Only	Do the written procedures consider, in addition to the operator's own information, data from external sources (e.g. trade associations, government agencies, or other system operators, etc.) to assist in identifying potential threats?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		No outside external sources were utilized due to the small system characteristics.				

20	.1007(b)	Does the documentation provided by the operator demonstrate implementation of the element "Identify Threats"?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						

192.1007(c) Evaluate and Rank Risk

Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C				
21	Information Only	Was the risk evaluation developed fully or in part using a commercially available tool? Fully <input checked="" type="checkbox"/> Partially <input type="checkbox"/> Not at all <input type="checkbox"/> Commercial tool name if used: SHRIMP								
Inspector's Comments										
22	.1007 (c)	Do the written procedures contain the method used to determine the relative importance of each threat and estimate and rank the risks posed? Briefly describe the method. Probability times consequence - SHRIMP	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Inspector's Comments										
		For questions 23 – 25, do the written procedures to evaluate and rank risk consider:	Corrosion	Natural Forces	Excavation Damage	Other outside Force Damage	Material or Welds	Equipment Failure	Incorrect Operation	Other Concerns
23	.1007 (c)	Each applicable current and potential threat?	U	S	S	S	S	S	S	S
24		The likelihood of failure associated with each threat?	U	S	S	S	S	S	S	S
25		The potential consequence of such a failure?	U	S	S	S	S	S	S	S
		Mark each box above with one of the following: S for "Satisfactory", U for "Unsatisfactory", N/A for "Not Applicable" and N/C for "Not Checked".								
Inspector's Comments										
26	.1007 (c)	If subdivision of system occurs, does the plan subdivide the system into regions with similar characteristics and for which similar actions are likely to be effective in reducing risk? Briefly describe the approach. .	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>				
Inspector's Comments		No subdivision – SMALL MUNICIPAL SYSTEM								
27	Information Only	Is the method used to evaluate and rank risks reasonable?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Inspector's Comments										
28	.1007(c)	Are the results of the risk ranking supported by the risk evaluation model/method?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Inspector's Comments										

29	.1007(c)	Did the operator validate the results generated by the risk evaluation model/method? Briefly describe. Unknown, unclear on whether the rankings produced by SHRIMP were validated. Notes in section 5.2 appear to indicate that the SHRIMP ranking was overridden by the operator.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		It is not clear if the operator overrode the SHRIMP ranking.				
30	.1007(c)	Does the documentation provided by the operator demonstrate implementation of the element "Evaluate and Rank Risk"?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		It is not clear as to whether the operator overrode the SHRIMP risk ranking or not. Notes appear to indicate this but the operator was unable to explain.				

192.1007 (d) Identify and implement measures to address risks						
Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
31	.1007 (d)	Does the plan include procedures to identify when measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		Meets bare minimum. Page 14 and 15 need to explain why improving the accuracy of locates needs to be improved.				
32	.1007 (d)	When measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk, does the plan identify the measures selected, how they will be implemented, and the risks they are addressing?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		See above				
33	.1007 (d)	Complete the table at the end of this form: <i>Threat Addressed, Measure to Reduce Risk, and Performance Measure</i>				
Inspector's Comments						
34	.1007 (d)	Does the plan include an effective leak management program (unless all leaks are repaired when found) 1. Locate the leaks in the distribution system; <input checked="" type="checkbox"/> 2. Evaluate the actual or potential hazards associated with these leaks; <input checked="" type="checkbox"/> 3. Act appropriately to mitigate these hazards; <input checked="" type="checkbox"/> 4. Keep records; and <input checked="" type="checkbox"/> 5. Self-assess to determine if additional actions are necessary to keep people and property safe. <input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						

PHMSA Form 22 - Gas Distribution System DIMP Inspection, September 23, 2011, Rev 0

35	.1007(d)	Does the documentation provided by the operator demonstrate implementation of the measures, required by Part 192 Subpart P, to reduce risk?		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		Lacking documentation. Example better locate quality. Example do CP reads for atmospheric corrosion.				

192.1007(e) Measure performance, monitor results, and evaluate effectiveness

Question No.	Rule §192	Description					S/Y	U/N	N/A	N/C
	.1007(e)	i) Number of hazardous leaks either eliminated or repaired, categorized by cause?	ii) Number of excavation damages?	iii) Number of excavation tickets received by gas department ?	iv) Total number of leaks either eliminated or repaired categorized by cause?	v) Number of hazardous leaks either eliminated or repaired, categorized by material?		vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the IM program in controlling each identified threat?		
36	Does the plan contain written procedures for how the operator established a baseline for each performance measure?	Y	Y	Y	Y	Y		N/A		
37	Does the plan establish a baseline for each performance measure?	Y	Y	Y	Y	Y		N/A		
38	Does the operator have written procedures to collect the data for each performance measure?	U	U	U	U	U				
39	Do the written procedures require the operator to monitor each performance measure?	U	U	U	U	U				
<p>Mark each box above with one of the following: S for "Satisfactory", U for "Unsatisfactory", N/A for "Not Applicable" and N/C for "Not Checked".</p>										
Inspector's Comments										
40	.1007 (e)	When measures are required to reduce risk, do the written procedures provide how their effectiveness will be measured?					<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments										
41	Information Only	Can the performance measures identified by the operator in the plan be counted, monitored, and supported?					<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments										
42	.1007(e)	Does the documentation provided by the operator demonstrate implementation of the element "Measure Performance, Monitor Results, and Evaluate Effectiveness"?					<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments										

192.1007(f) Periodic Evaluation and Improvement

Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
43	.1007 (f)	Do the written procedures for periodic review include: a. Frequency of review based on the complexity of the system and changes in factors affecting the risk of failure, not to exceed 5 years? b. Verification of general information (e.g. contact information, form names, action schedules, etc.)? c. Incorporate new system information? d. Re-evaluation of threats and risk? e. Review the frequency of the measures to reduce risk? f. Review the effectiveness of the measures to reduce risk? g. Modify the measures to reduce risk and refine/improve as needed (i.e. add new, modify existing, or eliminate if no longer needed)? h. Review performance measures, their effectiveness, and if they are not appropriate, refine/improve them?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
44	Information Only	Does the plan contain a process for informing the appropriate operating personnel of an update to the plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
45	Information Only	Does the plan contain a process for informing the appropriate regulatory agency of a significant update to the plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		Chapter 9				
46	.1007(f)	Does the documentation provided by the operator demonstrate implementation of the element "Periodic Evaluation and Improvement"?	<input type="checkbox"/>	x	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

192.1007(g) Report results

Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
47	.1007(g)	Does the plan contain or reference procedures for reporting, on an annual basis, the four measures listed in 192.1007(e)(1)(i) through (e)(1)(iv) to PHMSA as part of the annual report required by § 191.11 and the State regulatory authority?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		Section 9 reporting.				
48	Information Only	When required by the State, does the plan identify the specific report form, date, and location where it is to be submitted?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
49	.1007(g)	Has the operator submitted the required reports?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						

192.1009 What must an operator report when mechanical fittings fail?

Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
50	.1009	Does the operator have written procedures to collect the information necessary to comply with the reporting requirements of 192.1009?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						

192.1011 What records must an operator keep?

Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
51	.1011	Does the operator have written procedures specifying which records demonstrating compliance with Subpart P will be maintained for at least 10 years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
52	.1011	Does the operator have written procedures specifying that copies of superseded integrity management plans will be maintained for at least 10 years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						
53	.1011	Has the operator maintained the required records?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Inspector's Comments	
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Table 1: Threat Addressed, Measure to Reduce Risk, and Performance Measure

For the top five highest ranked risks from the operator’s risk ranking list the following:

- Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);
- Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #);
- Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);
- Associated performance measure.

	Primary Threat Category	Threat Subcategory, as appropriate	Measure to Reduce Risk	Performance Measure
1	Excavation damage	Third Party	Improve line marking accuracy Monitor and audit excavation activities Install additional line markers Review map availability	Damages per 1,000 locates
2	Corrosion	Atmospheric corrosion	See page 15 for AA’s	
3				
4				
5				

Other Inspector Comments	Buckley has experienced below ground leaks on Steel inserted in conduit. Due to shielding from CP. This threat should addressed above atmospheric corrosion due to potential consequences of underground gas migration.
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