

Distribution Integrity Management Program (DIMP)

Inspection Form

For Master Meter and Small LPG Operators of Gas Distribution Systems

For Requirements of 192.1015

Version 9/23/2011

This inspection form is for the evaluation of gas distribution integrity management program inspection of master meter or small liquefied petroleum gas LPG operators as defined in 192.1001. The form contains questions related to specific regulatory requirements and questions which are strictly for informational purposes. The questions 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 8 asks, "Do the written mechanisms or procedures specify the means to collect the additional information over time through normal activities conducted on the pipeline (e.g. design, construction, operations or maintenance activities)?" 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 Information:

| | |
|--|--|
| Name of Operator (legal entity): | |
| PHMSA Operator ID(s) Included in this Inspection: | |
| Type of Operator: | <input type="checkbox"/> Master Meter <input type="checkbox"/> Small LPG |
| States(s) included in this inspection: | |
| Headquarters Address: | |
| Company Contact: | |
| Phone Number: | |
| Email: | |
| Date(s) of Inspection: | Click here to enter a date. TO Click here to enter a date. |
| 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 |
|---|--------------|---------------------|--------------|
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State or Federal Representatives:

| Inspector Name | Agency | Phone Number | Email |
|-----------------------|---------------|---------------------|--------------|
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Inspector Comments (optional):

§ 192.1015(a) What must a master meter or small liquefied petroleum gas (LPG) operator do to implement this subpart?

| Question No. | Rule §192 | Description | S/Y | U/N | N/A | N/C |
|----------------------|------------------|--|--------------------------|--------------------------|--------------------------|--------------------------|
| 1 | .1015(a) | <p>Was the plan written and implemented per the requirement of 192.1015 by 08/02/2011?</p> <p><u>OR</u></p> <p>For a gas system put into service or acquired after 08/02/2011, was a plan written and implemented prior to beginning of operation?</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector's Comments | | | | | | |
| 2 | Information Only | <p>Were commercially available product(s)/template(s) used in the development of the operator's written integrity management plan?</p> <p>Fully <input type="checkbox"/> Partially <input type="checkbox"/> Not at all <input type="checkbox"/></p> <p>Commercial product(s)/templates name if used:</p> | | | | |
| Inspector's Comments | | | | | | |
| 3 | Information Only | <p>Does the operator's plan assign responsibility, including titles and positions, of those accountable for developing and implementing required actions?</p> | | | | |
| Inspector's Comments | | | | | | |

192.1015(b)(1) Knowledge

| Question No. | Rule §192 | Description | S/Y | U/N | N/A | N/C |
|-------------------------------------|------------------|--|--------------------------------|--------------------------|------------------------------|--------------------------|
| 4 | .1015(b)(1) | Does the plan include a written explanation of the mechanisms or procedures to address how the operator will demonstrate knowledge of its pipeline which, to the extent known, should include the approximate location and material of its pipeline? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector's Comments | | | | | | |
| 5 | Information Only | Do the written mechanisms or 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 | | | | | | |
| 6 | .1015(b)(1) | Does the plan include a written explanation of the mechanisms or procedures to identify additional information that is needed to fill gaps due to missing, inaccurate, or incomplete records? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector's Comments | | | | | | |
| 7 | .1015(b)(1) | Does the plan list the additional information needed to fill gaps due to missing, inaccurate, or incomplete records? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector's Comments | | | | | | |
| 8 | .1015(b)(1) | Do the written mechanisms or procedures specify the means to collect the additional information over time through normal activities conducted on the pipeline (e.g. design, construction, operations or maintenance activities)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector's Comments | | | | | | |
| 9 | .1015(c)(3) | Do the written mechanisms or procedures require the capture and retention of data on any new pipeline installed? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector's Comments | | | | | | |
| 10 | .1015(c)(3) | Does the captured and retained data on any new pipeline include, at a minimum, the location where the new pipeline is installed and the material from which it is constructed? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector's Comments | | | | | | |
| 11 | .1015(b)(1) | Has the operator demonstrated an understanding of its pipelines, which, to the extent known, should include the approximate location and material of its pipelines? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector's Comments | | | | | | |

192.1015 (b)(2) Identify Threats

| Question No. | Rule §192 | Description | S/Y | U/N | N/A | N/C |
|----------------------|-------------|--|--|--|--|--|
| 12 | .1015(b)(2) | In identifying threats, do the written mechanisms or 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 Weld Failure • Equipment Failure • Incorrect Operation | <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"/> | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> |
| Inspector's Comments | | | | | | |
| 13 | .1015(b)(2) | Did the operator consider the information that was reasonably available to identify existing and potential threats? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector's Comments | | | | | | |
| 14 | .1015(b)(2) | Does the documentation provided by the operator demonstrate implementation of the element "Identify Threats"? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector's Comments | | | | | | |

192.1015(b)(3) Rank Risks

| Question No. | Rule §192 | Description | S/Y | U/N | N/A | N/C |
|----------------------|------------------|---|--------------------------|--------------------------|--------------------------|--------------------------|
| 15 | Information Only | Was the risk evaluation developed fully or in part using a commercially available tool? Fully <input type="checkbox"/> Partially <input type="checkbox"/> Not at all <input type="checkbox"/> Commercial tool name if used: | | | | |
| Inspector's Comments | | | | | | |
| 16 | .1015(b)(3) | Do the written mechanisms or procedures contain the method used to determine the relative importance of each threat and estimate and rank the risks posed? Briefly describe the method. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector's Comments | | | | | | |
| 17 | .1015(b)(3) | Did the operator validate the results generated by the risk evaluation model/method? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector's Comments | | | | | | |
| 18 | .1015(b)(3) | Does the documentation provided by the operator demonstrate implementation of the element "Evaluate and Rank Risk"? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector's Comments | | | | | | |

192.1015 (b)(4) Identify and implement measures to mitigate risks

| Question No. | Rule §192 | Description | S/Y | U/N | N/A | N/C |
|----------------------|-------------|--|--------------------------|--------------------------|--------------------------|--------------------------|
| 19 | .1015(b)(4) | Do the written mechanisms or procedures identify when measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector's Comments | | | | | | |
| 20 | .1015(b)(4) | 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 type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector's Comments | | | | | | |
| 21 | 1015(b)(4) | Complete the table at the end of this form: <i>Threat Addressed, Measure to Reduce Risk, and Performance Measure</i> | | | | |
| Inspector's Comments | | | | | | |
| 22 | .1015(b)(4) | Does the documentation provided by the operator demonstrate implementation of those measures to reduce risk required by Part 192 Subpart P? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector's Comments | | | | | | |

192.1015 (b)(5) Measure performance, monitor results, and evaluate effectiveness

| No. | Rule §192 | Description | S/Y | U/ N | N/A | N/C |
|----------------------|-------------|---|--------------------------|--------------------------|--------------------------|--------------------------|
| 23 | .1015(b)(5) | Does the plan contain written mechanisms or procedures for how the operator monitors the performance measure “number of leaks eliminated or repaired on its pipeline and their causes”? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector's Comments | | | | | | |
| 24 | .1015(b)(5) | Did the operator monitor the performance measure “number of leaks eliminated or repaired on its pipeline and their causes”? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector's Comments | | | | | | |

192.1015(b)(6) Periodic Evaluation and Improvement

| Question No. | Rule §192 | Description | S/Y | U/N | N/A | N/C |
|----------------------|------------------|--|--|--|--|--|
| 25 | .1015(b)(6) | Do the written mechanisms or procedures provide for determination of the appropriate period for conducting IM program evaluations based on the complexity of its pipeline and changes in factors affecting the risk of failure, not to exceed 5 years? | <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 Comments | | | | | | |
| 26 | .1015(b)(6) | Do the written mechanisms or procedures consider the results of the performance monitoring in the periodic IM program evaluation? | <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 Comments | | | | | | |
| 27 | Information Only | Do the written mechanisms or procedures contain a process for informing the appropriate operating personnel of an update to the plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector's Comments | | | | | | |
| 28 | Information Only | Do the written mechanisms or procedures contain a process for informing the appropriate regulatory agency of a significant update to the plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector's Comments | | | | | | |
| 29 | .1015(b)(6) | Does the documentation provided by the operator demonstrate implementation of the element "Periodic Evaluation and Improvement"? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector Comments | | | | | | |

192.1015 (c) What records must an operator keep?

| Question No. | Rule §192 | Description | S/Y | U/N | N/A | N/C |
|----------------------|-------------|--|--------------------------|--------------------------|--------------------------|--------------------------|
| | | For questions 30-32: Does the operator have written mechanisms or procedures specifying the following records demonstrating compliance with Subpart P will be maintained for at least 10 years: | | | | |
| 30 | .1015(c)(1) | A written IM plan in accordance with 192.1015, including superseded IM plans? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector's Comments | | | | | | |
| 31 | .1015(c)(2) | Documents to support threat identification? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector's Comments | | | | | | |
| 32 | .1015(c)(3) | Documentation showing the location and material of all pipe and appurtenances that are installed after the effective date of the operator's IM program and, to the extent known, the location and material of all pipe and appurtenances that were existing on the effective date of the operator's program? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector's Comments | | | | | | |
| 33 | .1015(c)(3) | Has the operator maintained the required records? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Inspector's Comments | | | | | | |

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 | | | | |
| 2 | | | | |
| 3 | | | | |
| 4 | | | | |
| 5 | | | | |

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|--------------------------|--|
| Other Inspector Comments | |
|--------------------------|--|