



APGA Security and Integrity Foundation

Questions from 12-16-09 DIMP Webinar

Q: Prior to utilizing the SHRIMP tool, is there a guide for the operator; so that we could insure we have all the information needed prior to starting the SHRIMP tool process.

A: Since SHRIMP closely follows the GPTC Guide you could look at those questions and determine what data you would need to answer them. Also, you can go on <http://shrimp.gas-distribution.com> and see what data SHRIMP asks for.

Q: Would you suggest that operators line up (and identify) their subject matter experts now for each of their systems?

A: Yes. The term "Subject matter experts" sounds daunting, but it is really just your most knowledgeable operators – the people who inspect and maintain your distribution system day-to-day. They should be involved in the process.

Q: Will we be using benchmark information from previous files or will there be a national data base to compare against the standard. Will IOU's also be in the overall mix and if so can we filter out to compare with municipally owned system.

A: SHRIMP will provide some benchmark data such as whether a user's leak repairs for any of the 8 causes is above or below national averages. Once any number of users have entered data into SHRIMP SHRIMP may be able to provide more comparisons, such as leak repair rates on different types of steel pipe (e.g. coated, cathodically protected steel mains). We expect associations such as APGA will provide additional benchmarking information to members.

Q: Excess flow valves required for services that operate at 10 psi or above for the year statement.

Question: Without each individual service being recorded for the stated pressure for the year, are they going to allow the chart recorded records for the main line pressure as evidence of all the services attached to that main?

A: If the charts showed that pressure at some point during the year dropped below 10 psig then that could be relied on to show that all the downstream services also dropped below 10 psig. If the pressure dropped close to, but not below 10 psig, it would take some additional calculation to determine the pressures at downstream service lines.

Q: Will the SHRIMP site keep all of our plan records or just a copy of the latest changes to the plan /form made?

A: I will recommend to the advisors that SHRIMP will keep a copy of the current written DIMP plan and any superseded plans going back 10 years. I'm sure they'll agree. Right now there are no plans to have it keep records such as locate tickets, # of hazardous leaks or data related to performance measures, but that is something we may consider for future enhancements.

Q: How many times can the plan be changed and are there additional cost involved [using SHRIMP]?

A: It can be changed as many times as necessary up until August 2, 2011(or 12 months after they enroll, whichever is later) all under the initial fee. If a user wanted to revise their plan using SHRIMP after the first year's use has expired they would have to pay for another 12 months, and could then make unlimited number of changes up until that period expires.

Q: Do you have to start keeping data (to be used in DIMP) starting Jan.1, 2010?

A: If you are referring to data that would be reported to PHMSA (like # of hazardous leaks), that is better answered by PHMSA, but since the rule does not require that any portion of the written DIMP plan (with the exception of installing excess flow valves) be implemented before August 2, 2011 you would not need to begin tracking compression coupling failures, hazardous leaks or other DIMP requirements until then. If you are referring to data that you will use to create your plan (e.g. assess the threats) then you should start keeping it now, and look at the past 5 years or so to see if that data is useful and usable. The better the data the better the plan.

Q: Can you further define # of locates on new form -- Is it locate tickets that we receive or is it locates that we call in?

A: It is locate tickets you receive from your ONE CALL or directly from excavators.

Q: If it is locates tickets that we call in, is it just for the gas dept?

A: If you are more than just a gas utility, (e.g. electric, water, sewer) it is just those tickets for the gas department.

Q: Could we call in multiple tickets for a single job and improve our results?

A: You should continue your current policy for requesting locates.

Q: What if the excavation damage occurs on an excavation with no ticket?

A: It must still be counted.

Q: This seems more of a concern of corrosion, does this qualify as well for PE & for services?

A: Corrosion is just one of the 8 threats that must be assessed. Corrosion is not a threat to plastic but could be significant for metal services. The material and welds threat could apply to plastic (the brittle failure issue and potential for faulty fusion joints, for instance). Excavation doesn't seem to care what the pipe is made of. Your DIMP plan will have to consider each of the 8 threats for every inch of distribution pipe in your system.

Q: Does coupling failure include both steel and plastic? Also, the different styles of plastic couplings?

A: It includes anything that is a compression coupling, which includes steel to steel, steel to plastic and plastic to plastic. Failures on couplings like electrofusion couplings that aren't compression couplings would not be included (however APGA urges members to voluntarily report such plastic pipe failures to the PPDC).

Q: Although there was a section for compression couplings leaks, will there be a cause added with the material and weld on reporting section of annual report?

A: We will confirm this with PHMSA, but we understand that a compression coupling failure would continue to be listed under material and weld leak repaired/eliminated in Section C as well as under Section F.

Q: Will we have to enter information about the pipe that is in the ground today or newly installed pipe?

A: The rule requires that your DIMP plan include that you will keep certain data on pipe you install after August 2, 2011. For conducting threat assessments via SHRIMP or any other process you would only look at pipe in the ground as of the date you are performing the threat assessment. You would update information about the amount of pipe in the ground the next time you review your DIMP plan.

Q: Will SHRIMP have a database to track all the records required, such as all the information required for leaks? Where we could enter all our information in one place and SHRIMP record and report the data when needed? Or is it just to record number of leaks without all the information that we have to track already?

A: We are considering enhancing SHRIMP to serve as a recordkeeping system for all the data you have to track, but right now it only keeps data on past leak history and other data required to conduct the 8 threat assessments

Q: In order to eliminate the leak management plan, how soon would you need to repair all leaks?

A: The rule is silent on that. Under existing Part 192 requirements you have to immediately fix or make safe a hazardous (GPTC Class 1) leak. That does not change with DIMP. For Class 2 leaks GPTC recommends that "Leaks should be repaired or cleared within one calendar year, but no later than 15 months from the date the leak was reported." And "leaks should be reevaluated at least once every six months until cleared. The frequency of reevaluation should be determined by the location and magnitude of the leakage condition." Based on that, it would seem that a policy that calls for repairing non-hazardous leaks within 6 months would be consistent with industry standards of care. If you would ever go beyond 6 months you should have a written policy such as the GPTC guide's recommendations.

Q: Will Master Meter Operators have a separate web site for SHRIMP, and will they still be able to upload their data, such as pipe sizes, footages, leakage etc?

A: It will be the same web site and same questions as for utilities, but since master meter systems are typically smaller and simpler than utility piping they may be able to treat the entire system as one segment which will significantly reduce the time needed to go through the process.

Q: Has there been any discussion of federal funding for replacing higher risk pipes in older systems?

A: It was discussed during the recent economic stimulus package but no funds were included for replacing distribution piping.