

# Distribution Integrity Management Program (DIMP) Inspection

## Operator and General Audit Information

<b>Company:</b>	<b>Name:</b>		
	<b>Mailing and Official Address (If different):</b>		
	<b>Doing Business as or Affiliation:</b>		
<b>PHMSA Operator Identification (OPID) No.</b>			
<b>Address:</b>		<b>Lead Auditor or Inspector</b>	<b>Name:</b>
			<b>Agency:</b>
			<b>Date of Audit or Inspection:</b>

**Distribution Integrity Management Program (DIMP) Inspection**

***Company Representatives Participating***

<b>Key Persons</b>	<b>Name/Title/Mailing Address</b>	<b>Phone/Email Address</b>
<b>Primary Operator or Representative Interviewed or Providing Information</b>		
<b>Others Interviewed, Providing Information or Present at Audit or Inspection:</b>		

## Distribution Integrity Management Program (DIMP) Inspection

### 1. Issues Identified in Previous Integrity Management Inspections

Have all issues raised in previous DIMP inspections been satisfactorily addressed? (GDIM.QA.ISSUESIMPL.R)

192.1005 Review previous inspections.

Sat+	Sat	Concern	Unsat	NA	NC

**Notes**

## Gas Distribution Integrity Management - Plan Implementation

### 1. Plan Implementation - Implement Date

Was the plan written and implemented per the requirement of 192.1005 by 08/02/2011? (GDIM.QA.PLANIMPLEMENT.P)

**192.1005**

Plan should include the date the plan was written, the effective date and a revision history.

Sat+	Sat	Concern	Unsat	NA	NC

**Notes**

### 2. Plan Implementation – System Knowledge

Do the procedures identify or reference the appropriate sources used to determine certain characteristics (e.g., Design, Operating Conditions, Operating Environmental Factors) necessary to assess the threats and risks to the pipeline? (GDIM.RA.SOURCES.P)

192.1007(a)(1)

How does the operator demonstrate knowledge of the distribution system? Do the procedures include information such as the pipeline design and operations as well as environmental factors? Are these characteristics used to assess applicable threats and risks to the distribution system?

- Location
- Material composition
- Pipe sizes
- Joining method
- Construction methods
- Date of installation
- Soil conditions
- Operating and design pressure
- History
- Performance data
- Condition of the system
- Etc.

Sat+	Sat	Concern	Unsat	NA	NC

**Notes**

## Gas Distribution Integrity Management - Knowledge of the System

## Distribution Integrity Management Program (DIMP) Inspection

### 1. System Knowledge - Information Considered

Do the 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.)? (GDIM.RA.INFORMATION.P)

192.1007(a)(2)

What sources are used for this information? SMEs, maps, records, leak data, advisory bulletins, manufacture bulletins, etc. Does the operator have PermaLock mechanical tapping tees?

<https://www.nts.gov/investigations/AccidentReports/Reports/PSR1801.pdf>

Does the operator have inside meter sets? <https://www.nts.gov/investigations/AccidentReports/Reports/PAR1901.pdf>

Sat+	Sat	Concern	Unsat	NA	NC

**Notes**

### 2. System Knowledge – Information Gap Identification

Does the plan contain procedures to identify additional information that is needed to fill gaps due to missing, inaccurate, or incomplete records? (GDIM.RA.GAPS.P)

192.1007(a)(3) Is there information missing?

Sat+	Sat	Concern	Unsat	NA	NC

**Notes**

### 3. System Knowledge – Information Needed

Do the 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.)? (GDIM.RA.INFONEEDS.P)

192.1007(a)(3) What is the process for collecting the missing information?

Sat+	Sat	Concern	Unsat	NA	NC

**Notes**

### 4. System Knowledge - Information Needed

Does the plan list the additional information needed to fill gaps due to missing, inaccurate, or incomplete records? (GDIM.RA.INFONEEDS.R) What additional information is being collected? Review records.

192.1007(a)(3)

Sat+	Sat	Concern	Unsat	NA	NC

**Notes**

## Distribution Integrity Management Program (DIMP) Inspection

### 5. System Knowledge - New Pipe Data

*Do the procedures require the capture and retention of data on any new pipeline installed? (GDIM.RA.NEWPIPEDATA.P)*

192.1007(a)(5) Is all the necessary information being recorded for new installations? Is location, material, grade of steel, type of plastic, wall thickness, SDR, manufacturer, coating, lot number, model number, etc. being recorded?

Sat+	Sat	Concern	Unsat	NA	NC

**Notes**

### 6. System Knowledge - New Pipe Data

*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? (GDIM.RA.NEWPIPEDATA.R)*

192.1007(a)(5) Review records of new pipe installation (including valves and other appurtenances).

Sat+	Sat	Concern	Unsat	NA	NC

**Notes**

### 7. System Knowledge - Implementation

*Do records demonstrate implementation of the element "Knowledge of the System"? (GDIM.RA.DEMOKNOWLEDGE.R)*

192.1007(a) If other methods of system knowledge are used, such as SMEs, bulletins, etc., are those elements documented? What qualifications do the SMEs have?

Sat+	Sat	Concern	Unsat	NA	NC

**Notes**

### 8. System Knowledge - Understanding

*Has the operator demonstrated an adequate understanding of the system? (GDIM.RA.DEMOUNDERSTANDING.R)*

192.1007(a) (Use information found in questions 1-7.) Consider interviewing a field person to find out if they understand what they need to do to collect data to fill in the gaps and/or ensure all data is collected for new installations.

Sat+	Sat	Concern	Unsat	NA	NC

**Notes**

## Gas Distribution Integrity Management - Identify Threats

### 1. Identify Threats - Information Considered

*Did the operator consider the information that was reasonably available to identify existing and potential threats? (GDIM.RA.INFOCONSIDERED.P)*

Has new information been identified since the last inspection?

192.1007(b)

Sat+	Sat	Concern	Unsat	NA	NC

## Distribution Integrity Management Program (DIMP) Inspection

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**Notes**

### 2. Identify Threats - Information Considered

*In identifying threats did the information considered include all of the required data and information sources? (GDIM.RA.INFOCONSIDERED.R) (Maintenance History, Patrolling records, Excavation damages, organization changes, increased populations, pipe replacements, etc.) Have changes occurred that require re-evaluation of threats and risks?*  
192.1007(b)

Sat+	Sat	Concern	Unsat	NA	NC

**Notes**

### 3. Identify Threats - Outside Sources

*Do the 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? (GDIM.RA.OUTSIDESOURCES.P)*  
192.1007(b)

- a. American Gas Association (AGA) - Benchmarking/Innovative Practices
- b. AGA Gas Engineering and Operating Practices (GEOP) Series
- c. Pipeline Risk Management Manual by W. Kent Muhlbauer
- d. Gas Piping Technology Committee (GPTC) - American National Standards Institute (ANSI) Z380.1 Guide for Gas Transmission and Distribution Piping Systems
- e. Gas Technology Institute (GTI) Publications - including predecessor organizations Gas Research Institute and Institute of Gas Technology
- f. American Gas Foundation (AGF) Study - Safety Performance and Integrity of the Natural Gas Distribution Infrastructure January 2005
- g. GPTC Technical Report - ANSI GPTC Z380 TR-1 Review of Integrity Management of Natural Gas Transmission Pipelines
- h. American Society of Mechanical Engineers (ASME) Standard B31.8S - Managing System Integrity of Gas Pipelines
- i. Regional Industry Organizations - Midwest Energy Association (MEA); Southern Gas Association (SGA); Northeast Gas Association (NGA); Western Energy Institute (WEI)
- j. National Fire Protection Association (NFPA) - NFPA 54 National Fuel Gas Code
- k. Canadian National Standard - CNS Z662-1999
- l. Pipeline and Hazardous Materials Administration (PHMSA) Data Analysis
- m. National Transportation Safety Board (NTSB) - pipeline accident reports
- n. PHMSA Advisory Bulletins
- o. Guidance Manual for Operators of Small Natural Gas Systems - PHMSA publication
- p. Training Guide for Operators of Small LP Gas Systems - TSI publication
- q. NAPSR Plastic Pipe Ad Hoc Committee
- r. Plastic Pipe Data Committee

Sat+	Sat	Concern	Unsat	NA	NC

**Notes**

## Distribution Integrity Management Program (DIMP) Inspection

### 4. Identify Threats - Threats Considered

*In identifying threats, do the procedures include consideration of all of the required threat categories to each gas distribution pipeline?* (GDIM.RA.THREATCATEGORIES.P)

192.1007(b)

Must consider the following threats: Corrosion; Natural Forces; Excavation Damage; Other outside Force Damage; Material or Weld; Equipment Failure; Incorrect Operation; Other Concerns

How are these threats identified?

Sat+	Sat	Concern	Unsat	NA	NC

**Notes**

### 5. Identify Threats - Implementation

*Do records demonstrate implementation of the element "Identify Threats"?* (GDIM.RA.IMPLEMENTTH.R)

192.1007(b)

Include incident reports, leak reports, damage reports, corrosion records, patrolling records, maintenance history records, etc.

Sat+	Sat	Concern	Unsat	NA	NC

**Notes**

### 6. Identify Threats - Implementation (DIMP Process)

*If the threat identification and risk evaluation and ranking have been modified, were the revisions made in accordance with the procedure in the DIMP plan?* (GDIM.RA.IMPLEMENTTHUPDATEPLANIMPL.R)

192.1007(c)

Sat+	Sat	Concern	Unsat	NA	NC

**Notes**

## Gas Distribution Integrity Management - Evaluate and Rank Risk

### 1. Rank Risk - Methodology

*Do the procedures contain the method(s) and/or a model used to determine the relative importance of each threat and estimate and rank the risks posed?* (GDIM.RA.RISKRANKING.P) How does the operator determine risk ranking? Method or model? Do they use SMEs or SHRIMP or something else?

192.1007(c)

Sat+	Sat	Concern	Unsat	NA	NC

**Notes**

## Distribution Integrity Management Program (DIMP) Inspection

### 2. Rank Risk - Threats Considered

*Do the procedures to evaluate and rank risk consider each applicable current and potential threat?*

(GDIM.RA.THREATSCONSIDERED.P) Was new threat information incorporated into the DIMP Plan? Need to not only look at what is known but also what other potential threats may occur. Does the operator use a weighting factor for each threat?

192.1007(c)

Sat+	Sat	Concern	Unsat	NA	NC

<b>Notes</b>
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### 3. Rank Risk - Likelihood

*Do the procedures to evaluate and rank risk consider the likelihood of failure associated with each threat? Is all the system knowledge considered? Did the operator estimate the likelihood of failure for each threat?* (GDIM.RA.LIKELIHOOD.P)

192.1007(c)

*Examples of Likelihood factors:*

- a. Leaks per mile of main by material type
- b. Leaks per unit of services (based on size of operator)
- c. Amount of construction activity in area
- d. Number of hits per unit locate tickets

Sat+	Sat	Concern	Unsat	NA	NC

<b>Notes</b>
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### 4. Rank Risk - Consequences

*Do the procedures to evaluate and rank risk consider the potential consequence of failure for all applicable threats?*

(GDIM.RA.CONSEQUENCE.P) Is all the system knowledge considered? Did the operator estimate the consequence of failure for each threat?

192.1007(c)

*Examples of Consequence factors:*

- a. Operating pressure
- b. Population density ("downtown" versus rural)
- c. Impact of loss of supply
- d. Number of customers affected
- e. Proximity to structures and critical facilities (e.g. schools and hospitals)
- f. Proximity to known groups of people with limited mobility (usually institutionalized).

Sat+	Sat	Concern	Unsat	NA	NC

<b>Notes</b>
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## Distribution Integrity Management Program (DIMP) Inspection

### 5. Rank Risk - System Subdivision

*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?* (GDIM.RA.SUBDIVIDE.R) Has the operator added or modified subdivisions since the last inspection? Are the subdivisions appropriate and adequate? Were modifications done according to procedures? Review records.

192.1007(c)

Sat+	Sat	Concern	Unsat	NA	NC

<b>Notes</b>
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### 6. Rank Risk - Results

*Are the results of the risk ranking supported by the risk evaluation model/method?* (GDIM.RA.RESULTS.R)

Have the risk rankings been updated if results of the risk evaluation have changed?

192.1007(c)

Does each risk have a ranking score?

Sat+	Sat	Concern	Unsat	NA	NC

<b>Notes</b>
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### 7. Rank Risk - Validation

*Did the operator validate the results generated by the risk evaluation model/method?* (GDIM.RA.RESULTSVALIDATION.R)

192.1007(c)

How is the risk ranking evaluated? Team review? SME review? Does the risk ranking make sense?

Sat+	Sat	Concern	Unsat	NA	NC

<b>Notes</b>
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### 8. Rank Risk - Implementation

*Do records demonstrate implementation of the element "Evaluate and Rank Risk"?* (GDIM.RA.IMPLEMENTRR.R)

192.1007(c)

Review records.

Sat+	Sat	Concern	Unsat	NA	NC

<b>Notes</b>
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### 9. Identify Threats - Implementation (DIMP Process)

*If the threat identification and risk evaluation and ranking have been modified, were the revisions made in accordance with the procedure in the DIMP plan?* (GDIM.RA.IMPLEMENTTHUPDATEPLANIMPL.R)

192.1007(c)

Sat+	Sat	Concern	Unsat	NA	NC

## Distribution Integrity Management Program (DIMP) Inspection

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**Notes**

### Gas Distribution Integrity Management - Preventive and Mitigative Actions

#### 1. Measures to Reduce Risk - Identification

*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? (GDIM.PM.IDENTIFYMEASURES.P)*  
192.1007(d)

1. The procedure should detail the basis for decisions and be documented as part of the operator's IM plan. Decisions include:
  - a. Which measures to reduce risk to implement
  - b. Schedule for implementation of the measure(s) to reduce risk
  - c. Performance metrics for the measures to reduce risk
2. Identify roles and responsibilities of people involved with selecting and implementing measures to reduce risk.

Sat+	Sat	Concern	Unsat	NA	NC

**Notes**

#### 2. Measures to Reduce Risk - Identification

*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? (GDIM.PM.IDENTIFYMEASURES.R)* Review records demonstrating that a risk measure has been implemented or is scheduled to be implemented.  
192.1007(d)

Sat+	Sat	Concern	Unsat	NA	NC

**Notes**

## Distribution Integrity Management Program (DIMP) Inspection

### 3. Measures to Reduce Risk - Leak Management

Does the plan include an effective leak management program (unless all leaks are repaired when found)? (GDIM.PM.LEAKMANAGEMENT.P)

192.1007(d)

An effective leak management program (unless all leaks are repaired when found) includes:

- a. Locate the leaks in the distribution system;
- b. Evaluate the actual or potential hazards associated with these leaks;
- c. Act appropriately to mitigate these hazards;
- d. Keep records; and
- e. Self-assess to determine if additional actions are necessary to keep people and property safe.

Sat+	Sat	Concern	Unsat	NA	NC

<b>Notes</b>
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### 3a. Measures to Reduce Risk - Leak Management

Can the operator provide documentation to demonstrate that an effective leak management program is being implemented (answer "N/A" if all leaks are repaired when found)? (GDIM.PM.LEAKMANAGEMENTIMPL.R)

192.1007(d)

Sat+	Sat	Concern	Unsat	NA	NC

<b>Notes</b>
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### 4. Measures to Reduce Risk - Implementation

Do **records** demonstrate implementation of the measures, required by Part 192 Subpart P, to reduce risk?

(GDIM.PM.IMPLEMENTPM.R) Review records that demonstrate implementation of the measures. Have risks been re-evaluated and re-ranked due to changes to the threats? Does each implemented risk reduction measure identified in the DIMP plan address a specific risk or group of risks? Are performance measures being monitored from an established baseline?

192.1007(d)

Sat+	Sat	Concern	Unsat	NA	NC

<b>Notes</b>
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## Gas Distribution Integrity Management - Measure Performance and Evaluate Effectiveness

## Distribution Integrity Management Program (DIMP) Inspection

### 1. Measure Performance - Baseline

*Does the plan contain procedures for how the operator established a baseline for each performance measure?*

(GDIM.QA.PERFMEASUREBASELINE.P) Program documentation should include the process by which Operators establish a baseline measurement for each performance measure from which to evaluate changes. Program documentation should specify that the measures are to be taken and should identify the specific dates the measures should cover.

192.1007(e)

Performance Measures:

- a. Number of hazardous leaks either eliminated or repaired, categorized by cause?
- b. Number of excavation damages?
- c. Number of excavation tickets received by gas department?
- d. Total number of leaks either eliminated or repaired, categorized by cause?
- e. Number of hazardous leaks either eliminated or repaired, categorized by material?
- f. Any additional measures the operator determines are needed to evaluate the effectiveness of the IM program in controlling each identified threat?

Sat+	Sat	Concern	Unsat	NA	NC

<b>Notes</b>
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### 2. Measure Performance - Baseline

*Does the plan establish a baseline for each performance measure?* (GDIM.QA.PERFMEASUREBASELINE.R)

192.1007(e) Review records of the baseline for each performance measure.

Performance Measures:

- a. Number of hazardous leaks either eliminated or repaired, categorized by cause?
- b. Number of excavation damages?
- c. Number of excavation tickets received by gas department?
- d. Total number of leaks either eliminated or repaired, categorized by cause?
- e. Number of hazardous leaks either eliminated or repaired, categorized by material?
- f. Any additional measures the operator determines are needed to evaluate the effectiveness of the IM program in controlling each identified threat?

Sat+	Sat	Concern	Unsat	NA	NC

<b>Notes</b>
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## Distribution Integrity Management Program (DIMP) Inspection

### 3. Measure Performance - Data Collection

Does the operator have procedures to collect the data for each performance measure? (GDIM.QA.PERFMEASUREDATA.P)  
192.1007(e)

Performance Measures:

- a. Number of hazardous leaks either eliminated or repaired, categorized by cause?
- b. Number of excavation damages?
- c. Number of excavation tickets received by gas department?
- d. Total number of leaks either eliminated or repaired, categorized by cause?
- e. Number of hazardous leaks either eliminated or repaired, categorized by material?
- f. Any additional measures the operator determines are needed to evaluate the effectiveness of the IM program in controlling each identified threat?

Sat+	Sat	Concern	Unsat	NA	NC

<b>Notes</b>
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### 4. Measure Performance - Monitoring

Do the procedures require the operator to monitor each performance measure? (GDIM.QA.PERFMEASUREMONITOR.P)  
192.1007(e)

Performance Measures:

- a. Number of hazardous leaks either eliminated or repaired, categorized by cause?
- b. Number of excavation damages?
- c. Number of excavation tickets received by gas department?
- d. Total number of leaks either eliminated or repaired, categorized by cause?
- e. Number of hazardous leaks either eliminated or repaired, categorized by material?
- f. Any additional measures the operator determines are needed to evaluate the effectiveness of the IM program in controlling each identified threat?

Sat+	Sat	Concern	Unsat	NA	NC

<b>Notes</b>
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## Distribution Integrity Management Program (DIMP) Inspection

### 5. Measure Performance - Measure Effectiveness

When measures are required to reduce risk, does the plan provide/describe what type and/or what specific performance measures will be used to measure effectiveness? (GDIM.QA.MEASUREEFFECTIVENESS.P) Performance measures should reflect the purpose of the distribution integrity program or specific risk control practice. Performance measures should be something that can be counted, graphed and validated. An operator need not adopt all possible performance measures. It would be acceptable for the operator to select "a critical few" measurements.

Operators should establish trigger points or thresholds to prompt them to review the effectiveness of their risk reduction measures. Operators may determine through the reviews that the risk reduction measure must be changed or that additional measures are needed.

Performance measures should be "SMART" - specific, measurable, acceptable, realistic to achieve and time-bound with a deadline. 192.1007(e)

Sat+	Sat	Concern	Unsat	NA	NC

<b>Notes</b>
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### 6. Measure Performance - Implementation

Do records demonstrate implementation of the element "Measure Performance, Monitor Results, and Evaluate Effectiveness"? (GDIM.QA.IMPLEMENTEV.R) Review records.

192.1007(e)

Sat+	Sat	Concern	Unsat	NA	NC

<b>Notes</b>
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## Gas Distribution Integrity Management - Periodic Evaluation

### 1. Periodic Evaluation - Requirements

Do the procedures for periodic evaluation include all of the requirements of 192.1007(f)? (GDIM.CA.PERIODICEVAL.P)

(f) *Periodic Evaluation and Improvement. An operator must re- evaluate threats and risks on its entire pipeline and consider the relevance of threats in one location to other areas. Each operator must determine the appropriate period for conducting complete program evaluations based on the complexity of its system and changes in factors affecting the risk of failure. An operator must conduct a complete program re-evaluation at least every five years. The operator must consider the results of the performance monitoring in these evaluations.*

The written procedures for periodic review should 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).
- 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 (add new, modify existing, or eliminate if no longer needed).
- h. Review performance measures, their effectiveness, and if they are not still appropriate, refine/improve them.

192.1007(f)

Sat+	Sat	Concern	Unsat	NA	NC

## Distribution Integrity Management Program (DIMP) Inspection

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**Notes**

### 2. Periodic Evaluation - Implementation

Do **records** demonstrate implementation of the element "Periodic Evaluation and Improvement"? (GDIM.CA.PERIODICEVAL.R) 192.1007(f)

Review records. If any established performance measures indicated an increase in risk beyond an acceptable level (as established in the DIMP plan), were new risk reduction measures implemented along with their associated performance measures? If the periodic evaluation indicates that implemented measures to reduce risks are NOT effective, were risk reduction measures modified, deleted or added?

Sat+	Sat	Concern	Unsat	NA	NC

**Notes**

## Gas Distribution Integrity Management - Reporting

### 1. Report Results - Performance Measures

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? (GDIM.RR.ANNUALREPORT.P)

192.1007(g)

The operator must report the following measures:

- a. Number of hazardous leaks either eliminated or repaired as required by 192.703(c) of this subchapter (or total number of leaks if all leaks are repaired when found), categorized by cause;
- b. Number of excavation damages;
- c. Number of excavation tickets (receipt of information by the underground facility operator from the notification center);
- d. Total number of leaks either eliminated or repaired, categorized by cause;

Sat+	Sat	Concern	Unsat	NA	NC

**Notes**

## Distribution Integrity Management Program (DIMP) Inspection

### 2. Report Results - Submittal

Has the operator submitted the required reports? (GDIM.RR.SUBMITREPORTS.R)

192.1007(g) Review records.

Sat+	Sat	Concern	Unsat	NA	NC

<b>Notes</b>
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## Gas Distribution Integrity Management - Records Required to be Kept

### 1. Records - Requirements

Are there procedures specifying which records demonstrating compliance with Subpart P will be maintained for at least 10 years? (GDIM.QA.RECORDREQUIREMENTS.P)

192.1011

Examples of records demonstrating compliance may include:

- a. A written integrity management program (next question asks about superseded versions)
- b. Knowledge of the system documents
- c. Threat identification and risk assessment documentation
- d. Measures to address risk documentation
- e. Performance measures used to evaluate the effectiveness of risk mitigation measures documentation
- f. Records documenting performance of periodic evaluations of the DIMP program.
- g. Documentation of Notifications to PHMSA or State/Local Regulatory Agencies.

Sat+	Sat	Concern	Unsat	NA	NC

<b>Notes</b>
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### 2. Records - IM Plans

Are there procedures specifying that copies of superseded integrity management plans will be maintained for at least 10 years? (GDIM.QA.PLANRETENTION.P) Earlier revisions to the program should be included in document files as archived information.

Evidence should be included as to the effective date of the revisions.

192.1011

Sat+	Sat	Concern	Unsat	NA	NC

<b>Notes</b>
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## Distribution Integrity Management Program (DIMP) Inspection

### 3. Records - Implementation

Has the operator maintained the required records? (GDIM.QA.RECORDREQUIREMENTS.R)

192.1011 Review records including, but not limited to, the following:

- a. Corrosion records
- b. Continuing surveillance records
- c. Leak surveys
- d. Patrol records
- e. Maintenance records
- f. Other operations and inspection records

Sat+	Sat	Concern	Unsat	NA	NC

**Notes**

### 4. Deviation from Periodic Inspections - Approval

Has approval been requested or received from PHMSA or the appropriate State Regulatory Authority for alternate (less strict than code) periodic inspection intervals? [If no, mark Subgroup GDIM.IMPL questions 40-44 "N/A".] (GDIM.PI.PERIODICINSPDEVAPPRVIMPL.R)

192.1013(c)

Sat+	Sat	Concern	Unsat	NA	NC

**Notes**

### 5. Deviation from Periodic Inspections - Implementation

Have the periodic inspections been implemented and have they been conducted at the specified (approved) alternate intervals? (GDIM.PI.PERIODICINSPDEVPERFRMIMPL.R)

192.1013(c)

Sat+	Sat	Concern	Unsat	NA	NC

**Notes**

### 6. Deviation from Periodic Inspections - Requirements or Conditions

Have all conditions been complied with that were required as part of the alternate inspection interval approval? (GDIM.PI.PERIODICINSPDEVREQTIMPL.R)

192.1013(c)

Sat+	Sat	Concern	Unsat	NA	NC

**Notes**

### 7. Deviation from Periodic Inspections - Performance Measures

Do performance measure records indicate that deviation inspection resources were assigned to higher risk threat(s) and/or that that decreased inspection intervals contributed to an equal or greater overall level of safety has been achieved since the alternate inspection frequency was implemented? (GDIM.PI.PERIODICINSPDEVPRFMESIMPL.R)

## Distribution Integrity Management Program (DIMP) Inspection

192.1013(c)

Sat+	Sat	Concern	Unsat	NA	NC

Notes

### 8. Deviation from Periodic Inspections - Corrective Action

*If that an equal or greater overall level of safety has not been achieved, has corrective action been taken?*  
(GDIM.PI.PERIODICINSPDEVACTIONIMPL.R)

192.1013(c)

Sat+	Sat	Concern	Unsat	NA	NC

Notes