

Distribution Integrity Management – The future

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Where to from here?

- Doing nothing is not an option
- Simply applying the transmission rule is not an option either
 - Pigging is not practical
 - Hydro is difficult, at best
 - Direct Assessment won't work on plastic pipe
- The basic philosophy does apply
 - Understand where your risk comes from
 - Do something to reduce those risks

Challenges in Distribution IM

- Wide variation in operators and systems
 - Large companies with in-house expertise
 - Small municipals with limited staff
 - Stable populations vs. rapid growth
 - Older systems with cast iron vs. new all-plastic
- Need to control costs
- Need to define what can be done to improve safety

The Developing Consensus

- Agreement on Options to pursue
 - High-level, flexible federal rule
 - Guidance
 - Nationwide education program (811 dialing)
 - Continued R&D
- Agreement on what not to pursue
 - Model State legislation
 - Guidance for State adoption
 - Prescriptive federal rule

The Developing Consensus

- **Elements of distribution integrity management**
 - Written Plan
 - Understanding of the infrastructure
 - Identifying the threats
 - Assessing the risk
 - Addressing the threats
 - Monitoring performance/adjusting approach as needed
 - Reporting results

DIMP – What Else?

- Specific risk control practices that might be included are still under discussion
- Preventing excavation damage requires change in groups we don't regulate
- Actions to address other threats are more under operator control
 - State requirements
 - Operator practices beyond requirements

Addressing Damage Prevention

- One-calls exist; pipeline operators must participate
- Enforcement is spotty
- Data is being collected to verify that enforcement reduces instances of damage
- Consideration is being given to how to encourage more consistent enforcement

Addressing Other Threats

- Almost 40 percent of incidents are caused by other than external force damage
- The second major incident cause is “other”
 - New reporting categories will help
 - Wash. Gas seal failures are a recent example
- Operators should be able to take actions to reduce the chances of these incidents, but what actions?

Addressing Other Threats

- Early consideration of State requirements, operator programs, and regulatory “gaps”
 - Leaks: classification, analysis, trending, response
 - Focused pipe replacement: address pipe at risk
 - Eliminate inactive/capped service lines
 - Pipe condition monitoring

Excess Flow Valves

- NTSB recommendation (2001 incident, South Riding, VA)
- Cost-benefit varies with assumptions (OPS Docket 14455)
- OPS and Executive Steering Group preference to deal with in IM context
 - Akin to EFRDs (liquids), AOV/ROV (gas transmission): preventive & mitigative
- Fire services advocate separate requirement

The Bottom Line

- Congress wants action
- Action means new burdens on operators
- Reducing incidents justifies new costs
 - 126 incidents/year (1995-2004)
 - 17 fatalities/year
 - 61 injuries/year
- Cost recovery is a State issue