DISTRIBUTION INTEGRITY MANAGEMENT PLAN
&
APGA SIF SHRIMP PROGRAM

OKLAHOMA CORPORATION COMMISSION

2023

DISTRIBUTION INTEGRITY MANAGEMENT PLAN

(DIMP)

SUBPART P – GAS DISTRIBUTION PIPELINE INTEGRITY MANAGEMENT

192.1005 WHAT MUST A GAS DISTRIBUTION OPERATOR (OTHER THAN A SMALL LPG OPERATOR)

DO TO IMPLEMENT THIS SUBPART?

WHAAAA?
WAIT, WHAT THE HECK IS "SHRIMP"

SHRIMP is an on-line program developed by the American Public Gas Association (APGA) through support from PHMSA for operators of natural gas distributions systems use to create a written Distribution Integrity Management Plan (DIMP) specific for the needs of their systems.

OR

SIMPLE, HANDY, RISK-BASE INTEGRITY MANAGEMENT PLAN

(SHRIMP™)

How do I use SHRIMP?

If you have used SHRIMP before in version 3.0, but have not accessed the new version 4.0 SHRIMP Tool you will need to go to the web site to log in with a valid email address and get an access code to get into the new the 4.0 SHRIMP tool platform.

You can access the previous SHRIMP 3.0 platform at;

http://shrimp-legacy.apgasif.org.

You will be able to review finalized plans or resume a plan if it is in edit mode but you cannot create new plans or revise finalized plans in SHRIMP 3.0.

If you finalized any plans after February 1, 2022, you will need to contact APGA SIF support, go to:
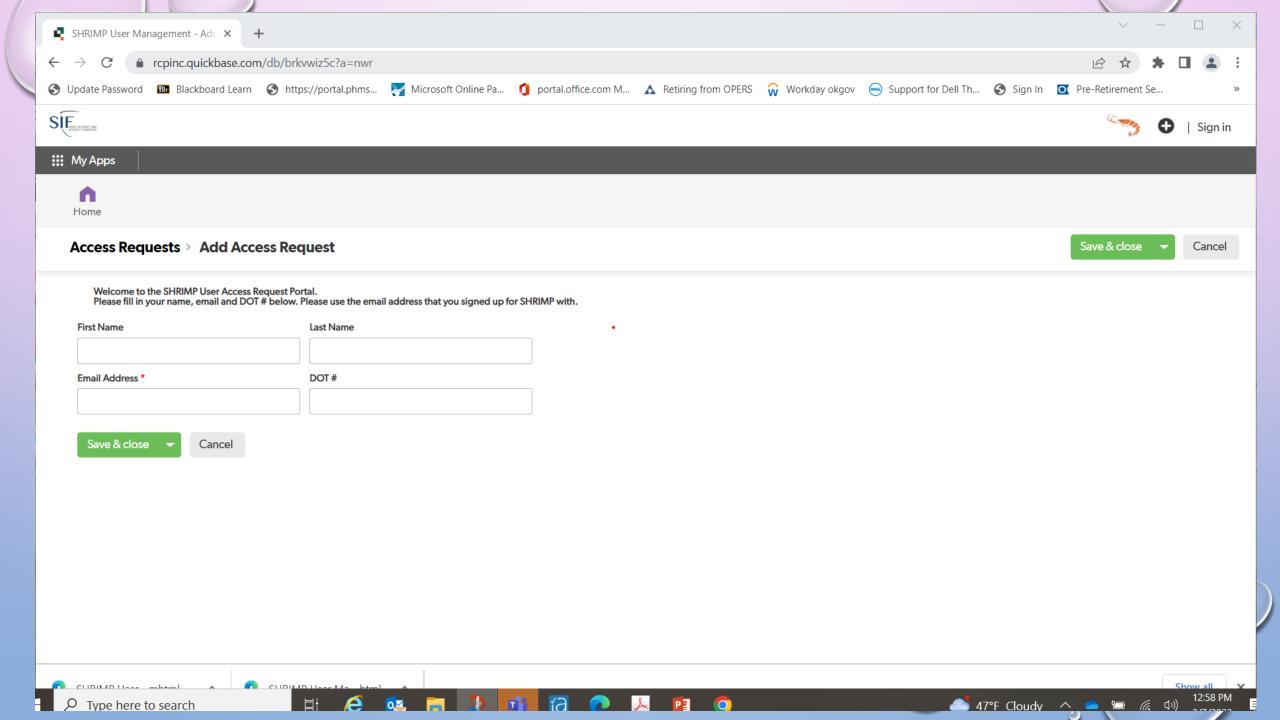
appsupport@apgasif.org

to get those plans transferred to SHRIMP 4.0.

How do I access "SHRIMP"?

If you are already a current SHRIMP subscriber go directly to the SHRIMP TOOL at:

http://shrimpaccess.rcp.com/

You will need to enter a valid email address to receive an access code to verify your account. You will create a password and answer a security question, <u>SAVE</u> your credentials to the new SHRIMP Tool platform!

SIF

My Apps

Home

Access Requests > Add Access Request

Save & close ▼   Cancel

Welcome to the SHRIMP User Access Request Portal.
Please fill in your name, email and DOT # below. Please use the email address that you signed up for SHRIMP with.

First Name   Last Name

Email Address *   DOT #

Save & close ▼   Cancel

PURCHASING OR RENEWING SHRIMP
You can apply for SHRIMP and renew memberships online

Questions about your membership?

Go to appsupport@apgasif.org or call 202-370-6211 Monday thru Thursday 0900-1600 ET
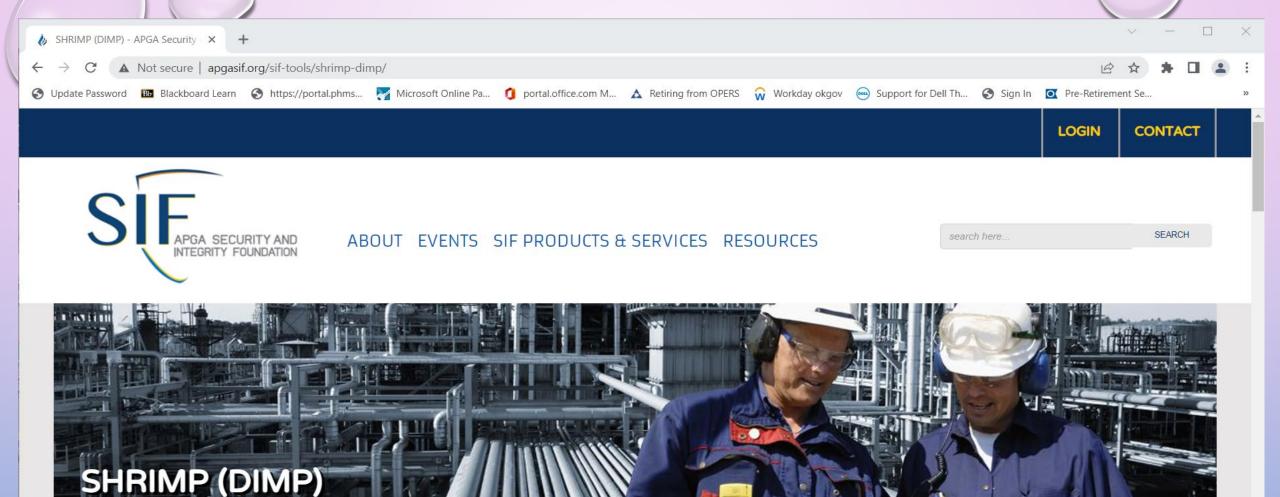
How much does SHRIMP cost?

(More than a bucket of oats but less than the horse)

SHRIMP fees must be paid in advance and they do not accept monthly payment schedules, you cannot access the SHRIMP program until full payment is received.

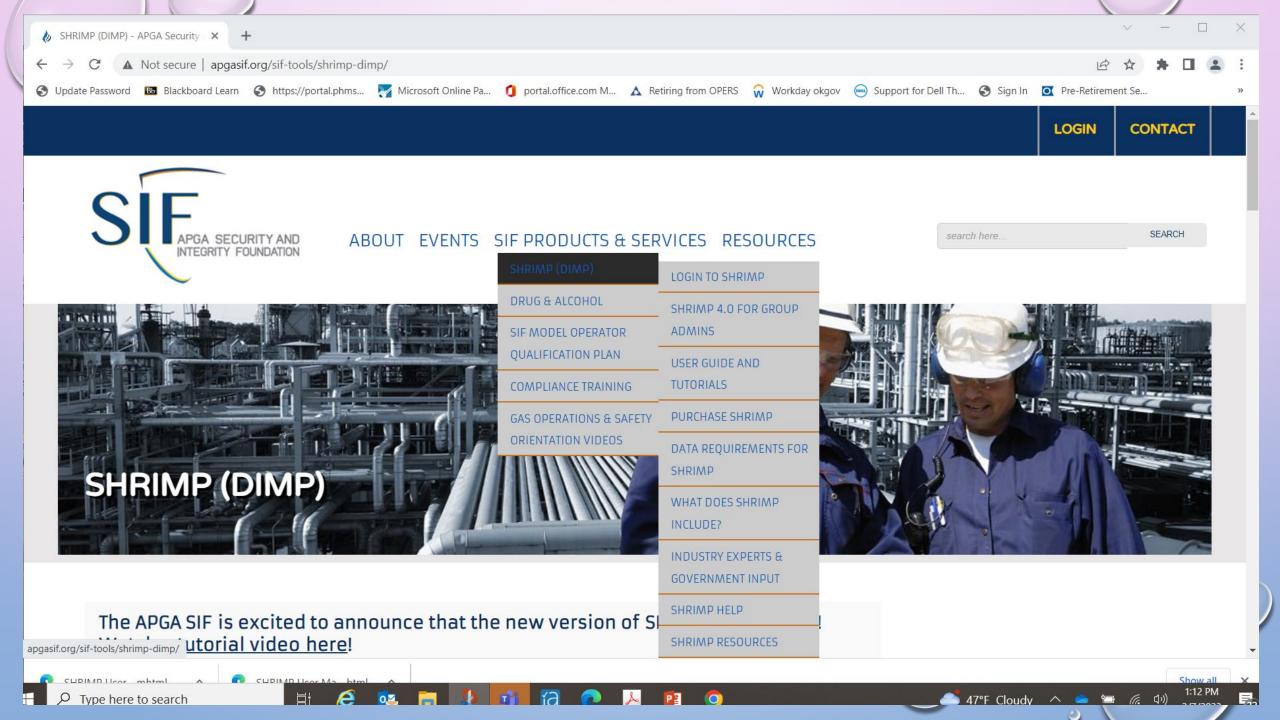| System Size (number of services)	Cost per Year
1 – 1,000	19.00
1,001 – 5,000	395.00
5,001 – 20,000	995.00
20,001 – 35,000	1,995.00
35,001 – 50,000	2,995.00

TO FAMILIARIZE YOURSELF WITH THE NEW VERSION GO TO THE APGA SIF WEB SITE AND DOWNLOAD THE SHRIMP USER GUIDE V4.0

apgasif.org/sif-tools/shrimp-dimp/

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SHRIMP (DIMP)

The APGA SIF is excited to announce that the new version of SHRIMP is now live!
Watch a tutorial video here!

Not secure | apgasif.org/sif-tools/shrimp-dimp/

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ABOUT   EVENTS   SIF PRODUCTS & SERVICES   RESOURCES

search here...   SEARCH

SHRIMP (DIMP)

DRUG & ALCOHOL

SIF MODEL OPERATOR QUALIFICATION PLAN

COMPLIANCE TRAINING

GAS OPERATIONS & SAFETY ORIENTATION VIDEOS

LOGIN TO SHRIMP

SHRIMP 4.0 FOR GROUP ADMINS

USER GUIDE AND TUTORIALS

PURCHASE SHRIMP

DATA REQUIREMENTS FOR SHRIMP

WHAT DOES SHRIMP INCLUDE?

INDUSTRY EXPERTS & GOVERNMENT INPUT

SHRIMP HELP

SHRIMP RESOURCES

SHRIMP (DIMP)

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SHRIMP User...mhtml   SHRIMP User Ma...html   Show all

Type here to search   47°F Cloudy   1:12 PM

Simple, Handy, Risk-based
Integrity Management Plan
(**SHRIMP™**)

User's Guide
v4.0

Table of Contents

American Public Gas Association Security and Integrity Foundation

Shrimp™
Version 4.0

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American Public Gas Association Security and Integrity Foundation
Shrimp™
Version 4.0
Page 3 of 56

BEFORE USING SHRIMP™, PLEASE READ THIS BACKGROUND DOCUMENT!

On December 4, 2009, the Pipeline and Hazardous Materials Safety Administration (PHMSA) published the final Distribution Integrity Management Program (DIMP) rule. The rule requires each operator of a natural gas utility, master meter system or propane pipeline system to prepare and follow a written DIMP Plan by no later than August 2, 2011.

The American Public Gas Association (APGA) Security and Integrity Foundation (SIF), with financial support from PHMSA, developed **SHRIMP™** ("<u>S</u>imple, <u>H</u>andy, <u>R</u>isk-based <u>I</u>ntegrity <u>M</u>anagement <u>P</u>lan), an on-line tool to create a written DIMP Plan ready for implementation and is customized for your unique system. An advisory group composed of government and industry pipeline safety experts guided the development of **SHRIMP™**, ensuring that all the requirements of the rule are included in the written DIMP Plan that **SHRIMP™** creates for you. We are pleased that you have elected to use **SHRIMP™** to guide your DIMP program.

What is "SHRIMP™"?

SHRIMP™ is an on-line tool that guides users through the threat identification and assessment process and results in a written Distribution Integrity Management Plan. It is much more than a model plan. It asks questions about your pipeline system inspection and maintenance history and creates a written DIMP Plan ready to implement.

SHRIMP™ includes (bold, underlined text indicates an element required by the DIMP regulation):

- A template for a written DIMP Plan, which is filled out with text, either provided by **SHRIMP™** or text that you enter during the question-and-answer process;

- PHMSA Distribution Annual Report data input including system's material of construction and leaks repaired by cause. You can edit these data or, if not found (as will be the case with master meter and low pressure (LP) piping systems, which do not file annual reports), enter your system data;

- A question-and-answer **<u>threat identification and assessment</u>** process including:

  o Questions that ask for specific construction, inspection and maintenance history (e.g., **<u>"knowledge of the infrastructure"</u>**) to assess each of the eight threats required by the DIMP rule,

  o Questions that ask for information to help the user decide if subdividing the system for any threat is advisable; and

  o Questions to help **SHRIMP™** recommend one or more Additional/Accelerated Actions to address one or more threats.

- A mathematical model to **<u>evaluate and rank risk</u>** according to the relative risk;

- A pick list of possible Additional/Accelerated Actions ("A/A Actions") the user may

Shrimp™
Version 4.0

WHAT IS SHRIMP?

SHRIMP is an on-line tool that guides users through the identifying your system, threat identification, assessment process, evaluation of threats and ranking. Then based on the data you put into the program, the SHRIMP program will develop a written DIMP plan for your system(s).

You must read the questions carefully and give specific answers, then enter data that you have accurate records to support.

Keep in mind if you answer the questions incorrectly or enter bad data, SHRIMP will provide you a plan based on that incorrect and bad data!

It will be garbage.

WHAT INFORMATION ABOUT MY SYSTEM DO I ENTER?

SHRIMP will require data input including the system material of construction, leaks repaired by cause, and other system information.

This is why it important to keep complete and accurate records for all materials you use and place into service in your system. You must keep accurate records of leaks by their cause so you can properly identify them in the SHRIMP program.

Identifying leaks by a cause not associated to that leak can cause the program to drive you to have accelerated actions that you may not need and cause concerns over issues that are not present.

WHAT ARE THREATS?

A threat is something that can cause distribution pipe or components to leak or fail.

The DIMP rule requires the operator to assess the following 8 threats:

1. Corrosion, (external, internal and atmospheric)

2. Natural Forces, (weather, flooding, landslides, earthquakes…)

3. Excavation Damage, (first, second and third party)

4. Other Outside Force Damage, (vehicular damage, vandalism, terrorism)

5. Material, Weld, or Joint Failure, (including compression couplings)

6. Equipment Failure, (valves, regulators, meters)

7. Incorrect Operation, (failure of an individual to properly perform tasks)

8. Other Threats not included in the above specific threats

WHAT ARE ADDITIONAL/ACCELERATED ACTIONS?
"AA's"

The objective of a DIMP program is to evaluate if threats exist that may affect the integrity of your system and to determine if you should be doing more to address those threats. The term A/A action used is to mean action to reduce threats that go beyond the minimum maintenance and inspection requirements of the regulations.

For example an operator may determine that an excavation project might pose an unacceptably high risk of damage to a major feed main and therefore determines to do more than just mark the location of the main and decide to have personnel on site to ensure the pipeline is being protected and no damage occurs during the project.

SHRIMP offers optional AA's that the user can choose from if it is determined that more needs to be done to address any of the 8 threats, in addition you can insert your own wording for actions that you may decide would best address an action to be taken.

Be sure that when you select or identify an action to be taken that you perform that action in a time frame described in your performance measures and document that the action has been completed as required.

WHAT ARE THE MAIN STEPS IN DEVELOPING AND IMPLEMENTING THE DIMP USING SHRIMP?

SHRIMP PROCESS

Enter/confirm system information,

Select Settings,

Complete Threat Interviews,

Validate Risk Rankings,

Select Additional Actions

Select Performance Measures,

Create Implementation Plan, and

Download Plan

1. ENTER THE SYSTEM INFORMATION.

Most of the information will be found in your Distribution Annual Reports (Form 7100.1-1), if changes are made to the system you will need to update any previously entered data to ensure is correct.

Other information from: leak surveys, leak repair records, CP monitoring and corrosion records, construction records, records of materials and equipment installed in your system, excavation tickets and damage records, exposed pipe records.

2. SELECT SETTINGS.

Next is entering the required settings for you plan;

The Name of your System - as it will appear in the written plan.

A Description of what part of your system this plan covers. (default is the entire system)

What type of system you have - for most this will be a natural gas distribution system.

The History Period - some of the threat assessments will ask for past data on leak repairs and excavation damage you will need to enter here for how many years back you will enter that inspection and maintenance data.

The default is 5 years, you can select up to 10 years.

MORE years of data = a better DIMP plan!

Leak Location Procedure - enter a cross reference to you existing leakage survey and odor complaint response procedures.

Leak Management Procedures – you can select one of the 2 pre-written options in SHRIMP or you can enter the leak management procedures you have in your O&M manual if those are the procedures you use.

Program Re-Evaluation Period – this be the time frame you will re-evaluate and rank your threats in the program, you can select from 1 to 5 years. **(the code requires at least every 5 years)**

The Identity of the Regulatory Agency that Audits your Compliance – Oklahoma Corporation Commission.

External Sources of Information Used in Your Plan – you can select any trade associations, government agencies or other entities from the list provided or add any external sources you use. (APGA you're using SHRIMP, OGA if you're a member or use their information etc.)

Enter the Names of those Responsible – enter responsible parties the ensure the requirement of this plan are carried out.

3. COMPLETE THREAT INTERVIEWS

SHRIMP uses an interview process to assess each of the 8 threats:

Corrosion, Natural Forces, Excavation Damage, Other Outside Force, Material-Weld-Joint Failure, Equipment Failure, Incorrect Operation, and Other Threats.

Some of the threats are broken down into two or more sub-threats, you must complete each threat and sub-threat interviews before going to step 4 and beyond.

You can go back and change any of the information you provide in the threat interviews.

The threat interviews are designed to satisfy two requirements of the DIMP rule under 192.1007: (a) Knowledge and (b) Identify Threats.

4. VALIDATE RISK RANKINGS

After all 8 threat interviews have been completed SHRIMP will rank each threat and section by relative risk, from highest to lowest, based on a numerical model that considers likelihood and consequences of the risk that a segment of your system to fail due to the threat. A complete description of the risk ranking model is in Appendix A and an attachment to the written plan when created by SHRIMP.

Validation means reading the explanation of why SHRIMP ranked each threat where it did. Do you agree with those rankings? Based on your knowledge of the system should it be ranked higher or lower? You can re-assign the risk rank and provide an explanation why you feel the threat should be ranked differently, be sure you document there is a valid justifiable reason for the change!

Risk Ranking process is intended to satisfy the requirements of 192.1007(c) Evaluate and Rank Risk.

5. SELECT ADDITIONAL ACTIONS (A/A's)

After you are satisfied that all threat sections are ranked correctly in order, the next step is to select additional actions you will undertake to reduce those threats. "Additional actions" mean actions above and beyond what is required by the pipeline safety regulations. Other tha implementing a leak management program the rule does not presume that any further actions are necessary, you must decide whether any of the threats pose a level of risk that warrant additional action.

Further guidance can be found in the "Selecting Additional/Accelerated Actions" section of the User Guide.

Additional Actions is intended to meet the requirement fo 1921007(d) Identify and Implement measures to Address Risks.

6. SELECT PERFORMANCE MEASURES

Once you have selected additional actions in step 5, you must select performance measures for each of the additional actions to describe how you will track those actions to monitor and evaluate those actions and determine if they are being effective.

If you did not feel any threats warranted additional actions you can skip this step.

This step is intended to address the requirement of 192.1007(e), Measure Performance, Monitor Results and Evaluate Effectiveness

7. CREATE IMPLEMENTATION PLAN

You should now be ready to review the actions required to implement your written DIMP plan. All of the actions required by the rule or selected by you in the additional actions and performance measure steps can be displayed by clicking on "Implementation Plan" in the blue button bar at the top of each page. The Implementation Plan should answer questions of Who, What, When, Where, and How each required action will be accomplished. The action items in you DIMP pan can be summarized by the following:

1. Describe how you will modify your procedures, policies and recordkeeping as necessary to collect and retain information required to be collected and retained under the DIMP plan including mandatory performance measures and performance measures you selected in the previous step.

2. Describe how you will implement an Additional/Accelerated Actions that you included

3. Describe how, during the normal course of business you will gather any information that was unkown to you during the threat assessment process.

Each action item will listed separately with a text box in which you must enter a description of how you will accomplish the action.

8. ADD TEXT (If necessary)

If you determine additional text is necessary in your plan SHRIMP offers opportunity in a few select places.

You can view where those predetermined areas are in the "Add Text" feature.

9. GENERATE AND DOWNLOAD YOUR WRITTEN DIMP PLAN

When you are satisfied that step 1-8 are completed and all information is correct, you should download your written DIMP plan to your computer.

Suggestion, you put a lot of hard work into developing your plan so;

save a hard copy just incase your computer crashes.

10. IMPLEMENT THE ACTION ITEMS IN YOUR DIMP PLAN

Like all other plans required by the regulations, you must follow your plan as it is written. Failure to follow through on actions in your written DIMP plan could result in violations and possible fines.

You must maintain records to demonstrate that you are following through on each action item listed in your written DIMP plan. You must have these records and your written plan available for review by federal and state inspectors!

USEFUL APGA LINK

HTTPS://APGASIF.ORG/SHRIMP-USER-GUIDE-TUTORIALS/

QUESTIONS?