

THE U.S. HAZARDOUS LIQUIDS PIPELINE INDUSTRY  
Voluntary Release Reporting System

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Pipeline Performance  
Tracking System

PIPELINE PERFORMANCE TRACKING SYSTEM

# Frequently Asked Questions

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DON'T FIND WHAT YOU NEED?

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Note that the Table of Contents entries shown above is hyperlinked to the referenced FAQ. The navigation pane on the left also contains a link back to this Table of Contents and a link to the Index, as well as to each chapter of these FAQs.

You may access these FAQs online at [www.api.org/ppts](http://www.api.org/ppts).



# Background on PPTS

## What is PPTS?

The Pipeline Performance Tracking System (PPTS) was created in 1998 as a result of a decision by the leadership of the oil pipeline industry to know more about our own safety and environmental performance than anyone else. Participants complete release incident surveys and infrastructure surveys and enter the data into the PPTS. This data is used to evaluate the oil pipeline industry's performance as a whole to gain a better understanding of the industry's performance and to identify trends that may not be apparent within one company's operations. The purpose is to improve oil pipeline industry performance, demonstrate the industry's commitment to continuous improvement and continue to drive toward the goal of error-free and spill-free operations.

In October of 2000, the pipeline leadership created the Data Mining Team (DMT), a group of subject matter experts drawn from a cross-section of the industry. The DMT is responsible for the maintenance of PPTS and undertakes analytical work based on PPTS data. This analytical work provides information to operators on significant factors related to incidents, regulatory changes and infrastructure trends. The DMT is part of a broader Performance Excellence Team, the group tasked by the liquid pipeline leadership with promoting practices to drive the industry's performance to zero spills, zero injuries and zero deaths.

## What companies participate in PPTS?

Participation in PPTS is open to any operator of hazardous liquid pipelines that is willing to commit to providing the in-depth incident and infrastructure information. Membership in API or AOPL is not a prerequisite to participate in PPTS. There is no fee for participation in PPTS.

[Click here for a list of participating operators.](#) They operate about 85% of the mileage under the U.S. Department of Transportation's Pipeline and Hazardous Materials Safety Administration (PHMSA). [Other key words: OPS, DOT]

Where can I get information about PPTS online?

The URL for PPTS, including copies of these FAQs, other documents is [www.api.org/ppts](http://www.api.org/ppts). The data entry system itself is located at <http://ppts-survey.api.org/index.asp>.

Why is my company's information important? Do I really have to answer every question asked?

PPTS is one of the foundation elements building toward the goal of error-free and spill-free operations. As a foundation element, all participants need to ensure that their individual contributions – each field, each number – accurately reflect the incidents that occur and the descriptive elements about company systems and the national oil pipeline network. API developed PPTS Operator Advisory 2003-6 about best practices for ensuring high data quality. The advisory can be viewed at the following link [http://www.api.org/Oil-and-Natural-Gas-Overview/Transporting-Oil-and-Natural-Gas/Pipeline-Performance-PPTS/PPTS-Related-Files/~media/Files/Oil-and-Natural-Gas/PPTS/Advisories-Archive/2003\\_6AdvisoryReportingPractices.ashx](http://www.api.org/Oil-and-Natural-Gas-Overview/Transporting-Oil-and-Natural-Gas/Pipeline-Performance-PPTS/PPTS-Related-Files/~media/Files/Oil-and-Natural-Gas/PPTS/Advisories-Archive/2003_6AdvisoryReportingPractices.ashx)

What assets are covered in the PPTS?

The PPTS participants provide performance information for all the assets they operate whether or not those assets fall under the regulatory oversight of the U.S. DOT Office of Pipeline Safety. Participants also provide information on assets where they are the operator of record (see PPTS Operator Advisory 2007-1 at [http://www.api.org/Oil-and-Natural-Gas-Overview/Transporting-Oil-and-Natural-Gas/Pipeline-Performance-PPTS/PPTS-Related-Files/~media/Files/Oil-and-Natural-Gas/PPTS/Advisories/2007\\_1\\_Advisory\\_Asset\\_Overage\\_Final.ashx](http://www.api.org/Oil-and-Natural-Gas-Overview/Transporting-Oil-and-Natural-Gas/Pipeline-Performance-PPTS/PPTS-Related-Files/~media/Files/Oil-and-Natural-Gas/PPTS/Advisories/2007_1_Advisory_Asset_Overage_Final.ashx)). [Key word: PHMSA.]

What is reportable to DOT vs. PPTS? What are the differences?

Because PPTS is interested in learning from releases to prevent similar occurrences, PPTS requests release data for incidents that occur both on unregulated assets and also for incidents associated with maintenance releases. Therefore, PPTS wants data on a larger set of incidents than DOT. [Keyword: PHMSA.]

There incidents that occur on other modes of transportation are outside the scope of PPTS. The line of demarcation is based on location boundaries.

These are:

Rail loading/offloading interface

Truck rack interface

Dock/Barge loading/offloading interface

There is further information on the lines of demarcation available within this document.

### What is the "Incident" survey?

Incident surveys are collected annually for any incidents that meet PPTS reporting thresholds. [Click here to see a copy of the incident survey for releases.](#) Originally, incident surveys were developed for reporting release events. More recently, PPTS was expanded to integrate reports to be submitted to DIRT, the "Damage Information Reporting Tool" developed by the wide coalition of stakeholders in the Common Ground Alliance. This has expanded the scope to damage incidents with or without a release. Thus, within the PPTS structure, participants can report incidents that are reportable to DIRT whether or not there was a release. ([Click here for more on DIRT.](#))

### What is the "Infrastructure" survey?

For each reporting year, PPTS participants also fill out an infrastructure survey, a supplemental survey of information needed to understand the infrastructure in place and normalize accident information (e.g., spill rates per mile or per volume). This supplemental survey includes system mileage, components, and volumes moved. [Click here to see a copy of this survey.](#)

### Will my data be treated as confidential?

Individual company information is kept confidential. API cannot assure, however, that company data would not have to be produced in the unlikely event that it was subpoenaed or otherwise ordered to be produced by a competent authority. The information collected will be factual and will not include narrative text describing incidents. The same information will exist in participating companies' files. We recommend that your own legal counsel be consulted in reaching your decision to participate.

### What is a Company ID (System ID)?

Each separate system or joint venture for which information is reported to PPTS is assigned a unique identifier (System ID). PPTS can accommodate separate reporting IDs for each of the subsystems or joint ventures that you operate, and can aggregate information to your corporate total. When you login at <http://ppts-survey.api.org/index.asp>, you will have access to the records for all of the systems you have registered for participation.

How do I get a login to enter data into PPTS?

Contact Bukky Adefemi at (202) 682-8548 or [adefemia@api.org](mailto:adefemia@api.org) if you require access to the data entry portion of PPTS. [Key word: login]

How does the oil pipeline industry use the data?

API and AOPL use this information to demonstrate the performance of the industry as a whole, to conduct performance benchmarking and to drive improved performance. The data is also used to prepare an annual confidential "report card" for each participating company comparing its results to the results from the rest of industry. [Other key words: performance comparison.]

My company is interested in the DOT performance record. If I report all of my operated assets, can PPTS differentiate DOT from non-DOT spills?

Yes, PPTS will use the question "was a form 7000-1 filed for this release" to determine which reports are for DOT assets. [Other key words: OPS, PHMSA.]

What numbers are used for the annual operator-specific (and confidential) report card?

PPTS uses the total number of spills from all assets for the standard report card. [Key words: performance comparison]

Can my company get a report of just its spills from DOT-jurisdictional assets

If your company would like a report for only DOT- jurisdictional assets, you may request that it be substituted for the standard report card. [Other key words: PHMSA.]

Where can I find out what we've learned from PPTS?"

The Data Mining Team writes "PPTS Operator Advisories" about important findings from the data. The Advisories cover the most important causes, the consequences, better ways to report, and a host of other topics. You can find a list of the Advisories at [http://www.api.org/Oil-and-Natural-Gas-Overview/Transporting-Oil-and-Natural-Gas/Pipeline-Performance-PPTS/PPTS-Related-Files/~ /media/Files/Oil-and-Natural-Gas/PPTS/Advisories/PPTS\\_Advisory\\_Number\\_and\\_Dates\\_Rev.ashx](http://www.api.org/Oil-and-Natural-Gas-Overview/Transporting-Oil-and-Natural-Gas/Pipeline-Performance-PPTS/PPTS-Related-Files/~ /media/Files/Oil-and-Natural-Gas/PPTS/Advisories/PPTS_Advisory_Number_and_Dates_Rev.ashx)



## PPTS Infrastructure Report

The mileage categories have changed for 2009. Why is this breakdown different and what lines should be in what category? (Q6a-6f)

In 2008, Part 195.11 was added to the regulation to change how some rural gathering lines are regulated. The change in the reporting form separates the regulated crude lines into three categories: the newly regulated lines per 195.11, the gathering lines that were always regulated because they are in non-rural areas, and all other regulated crude oil lines.

The mileage in the new 6d (rural regulated crude oil gathering under 195.11) would have been included with the unregulated gathering before. The mileage in the new 6b and 6c (non-rural regulated crude oil gathering) would have previously been included with the mileage in 6e (all other regulated crude oil service).

How does API define if the pipeline or facility is interstate or intrastate?

The classification of a pipeline or facility as interstate versus intrastate is not a question that API can answer. This is a legal question which only your company's legal department can answer.

My numbers add up but the software insists that they are wrong!

This problem occurs when you try to use decimal points. The software does not recognize decimal points in its calculations. So if you have 84.2 miles of interstate pipe and 12.6 miles of intrastate, you should just round the numbers to 84 and 13 miles, respectively. The total miles will then be  $84 + 13 = 97$  miles.

What do you mean by ethanol service? (Q10)

This number should include any pipelines that are only used in dedicated fuel grade ethanol (E100) service. Ethanol blends or batched ethanol should be reported in question 13.

What should be reported in question Q13 about ethanol?

If a pipeline is used to carry ethanol-blends or batches of ethanol occasionally or on a regular basis, report that mileage here.

What do you mean by biofuel service? (Q11)

Dedicated biofuel, such as biodiesel.

Why does PPTS want my Non-DOT Regulated tanks and terminals? (Q18-24)

PPTS collects release data on more than just DOT assets. Collecting the number of tanks that are not DOT regulated will allow for better normalization of release data as well as a greater amount of relevant data, facilitating greater accuracy in analyses.

[Other key words: PHMSA, terminal]

Which tanks should I report?

If there is a question as to what tanks to include, if you would report a spill from that tank, the tank should be included in this count. Do not include tanks for non-transported commodities, e.g. additive tanks, DRA tanks, tanks used to store fuel for on-site consumption.

What is a low pressure storage tank? (Q19)

Storage tanks with products that, due to their higher vapor pressure, are normally stored at greater than atmospheric pressure, but less than 15 psig.

How do I count the number of caverns or belowground storage facilities?

Count the entire facility as one unit, despite the number of individual caverns or wells.

How do I count tank "locations"? (Q23-24)

Count any location with one or more crude or petroleum product storage tanks regardless of jurisdictional status. A single "Location" can be a tank farm, a terminal, tanks in a gathering system, or a single tank on the ROW.

What constitutes a pump station? (Q25)

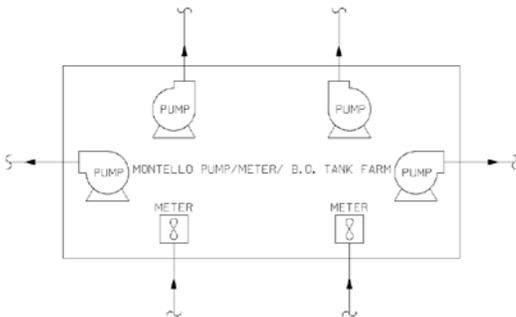
Any location with pumps providing pressure to move hazardous liquids through a pipeline. If pumps and meters are housed in the same location, report both, that is 1 pump station and 1 meter station for that single facility.

What pumps are included in Question 26?

All pumps capable of providing pressure to move hazardous liquids through a pipeline outside facilities. **Booster pumps should be included if they can be used independently to provide pressure to the pipeline.** Do not include sump pumps.

What constitutes a meter station? (Q27)

Any location containing meters used for custody transfer, pipeline control, product blending, or leak detection. If pumps and meters are housed in the same location, report both, that is 1 pump station and 1 meter station for that single facility.



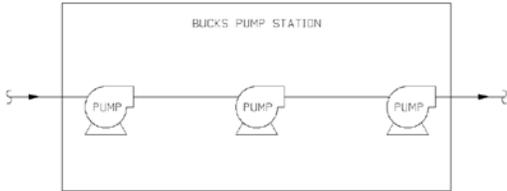
What do you mean by custody transfer meter? (Q28)

A custody transfer meter is any meter used to quantify the amount of hazardous liquid being transferred from the responsibility of one operator (custodian) to another. Do not include other types of meters such as check meters used for line balance.

I have a station that houses 4 pumps (4 different lines) and 2 meters (different lines). It is located in an HCA. How should I count this?

This particular station would count as 1 pump station for question 25, 4 pumps for question 26, 1 meter station for question 27, 2 meters for question 28, and one facility that “could affect” an HCA for question 29. We note that your diagram calls this facility a “tank farm.” If it is, it may also have tanks that should be counted for questions 18-21; it would also then be counted as a tank location for question 23 and/or 24 as appropriate.

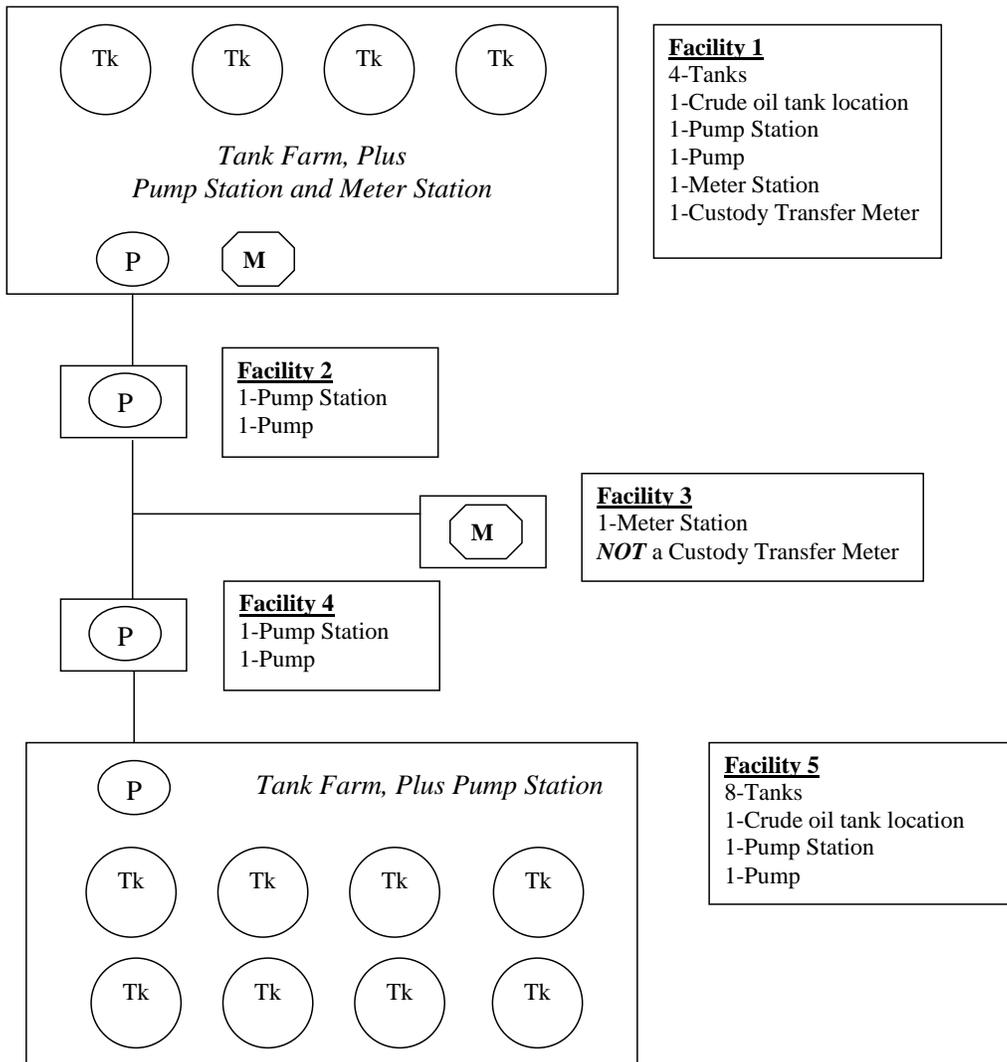
I have a station with three pumps that all provide pressure for the same line. It is not located in an HCA and can not "affect" an HCA. How should I count this?



This station would count as 1 pump station for question 25, 3 pumps for question 26, and not be added to the total of facilities that "could affect" an HCA for question 29.

How do I count number of facilities that "could

**All tanks and equipment are in crude oil service  
All are in HCAs**



**Total Counts for Questions 18 – 29 (by Q#)**

Q18 (tanks) = 12  
Q23 (crude tank locations) = 2  
Q25 (pump stations) = 4  
Q26 (pumps) = 4

Q27 (meter stations) = 3  
Q28 (custody transfer meters) = 1  
Q29 (HCA facilities) = 5

affect" an HCA? (Q29)

Count each physical location as only 1 facility, even if that physical location has tanks and meters and pumps and was used in the total for questions 23/24, 25 and 27. See picture below for an illustration of this concept. [Key words: HCA, pump, meter, tank, facility]

What are barrel-miles? (Q30-Q36)

According to FERC Form 6 (page 601): Barrel miles . . . are the summation, for all segments, of the number of miles associated with each pipeline segment . . . multiplied by the number of barrels delivered through the segment. For example, 1000 barrels moved through a 57-mile pipeline segment would be recorded as 57,000 barrel miles. For a crude pipeline with several segments:

Segments	Barrels	Miles	Barrel-miles
A	1,000	57	57,000
B	5,000	10	50,000
C	1,000	25	25,000
Total			132,000

Where is the baseline assessment question?

The baseline assessment question was removed. Most of the baselines are now complete. Any baselines done now would be for reactivated, newly regulated, or new pipelines and PPIS does not feel that this will be a significant enough number to track.

What if I perform integrity assessments on some of my unregulated assets or repair anomalies that are not required per the regulations?

If the question does not cite 49 CFR Part 195, it applies to all assets, whether under PHMSA jurisdiction or not. [Other key words: unregulated assets]

How do I report a "combination tool" (one that examined for metal loss and for deformation)?

Put it in both. It will help us evaluate what types of issues people are looking for with their tool runs. When we talk about the total miles inspected, we avoid double-counting by using the larger of metal loss tool miles versus dent/deformation tool miles for each operator. That takes care of the combination tools and tools run at the same time, but also accounts for the possibility that an operator ran a

dent/deformation tool to make sure that a crack tool would be able to pass. [Other key words: combo.]

I need more guidance on how report the repair of anomalies.

This question is meant to track dig and repair criteria as set by the operator. These criteria would in fact vary from operator to operator, and some operators may have more stringent criteria than others. What falls into a respondent's dig or repair criteria should be based on the individual operator's integrity management program or other operator-specific guidelines. API developed PPTS Operator Advisory 2004-4 with detailed information about reporting anomalies. This advisory can be found at [http://www.api.org/Oil-and-Natural-Gas-Overview/Transporting-Oil-and-Natural-Gas/Pipeline-Performance-PPTS/PPTS-Related-Files/~/\\_media/Files/Oil-and-Natural-Gas/PPTS/Advisories-Archive/2004\\_4AdvisoryPPTSIMPReporting.ashx](http://www.api.org/Oil-and-Natural-Gas-Overview/Transporting-Oil-and-Natural-Gas/Pipeline-Performance-PPTS/PPTS-Related-Files/~/_media/Files/Oil-and-Natural-Gas/PPTS/Advisories-Archive/2004_4AdvisoryPPTSIMPReporting.ashx)

Why does PPTS want to collect information on exempt mileage? (Q58)

The intent of collecting exempted mileage is to get a feel for the amount of infrastructure that is out there in each of these categories in the event that any of these exemptions come up for future regulation.

What counts as a corrosion control component?

The question about corrosion control is intended to collect information on what operators are doing voluntarily as good practice. You don't have to have an entire Subpart H program on these lines to answer yes. If you have CP, that would be enough for a yes.

What counts as a damage prevention/public awareness element?

Same with the damage prevention / public awareness question, lines in One Call could get a yes.

How will PPTS use this data on exempt mileage?

PPTS would not frame an argument on possible regulation in such a way to say that since we're already doing some work, it won't be much extra to meet regulatory requirements. On the contrary, we want to argue that we are already taking care of business on our own and don't need to be regulated. [Other key word: exempt]

## List of additions/changes to Infrastructure Survey 2009 versus 2008.

Crude Oil Gathering was broken into three new categories and main line crude oil lines are now their own category.

Questions on mileage of ethanol, biofuel, and ethanol blends were added.

Clarification that PPTS wants all tanks with transported commodity, not just DOT breakout tanks was added and a separate column for each type of tank was included to further eliminate confusion.

Question on number of terminals/tank farms was added.

Questions on number of pumps used for mainline transport and number of custody transfer meters were added.

Questions on barrel miles for ethanol and biofuel were added.

Baseline Assessment question was removed.

New section on exempt pipeline mileage was added.

## Should I report the mileage of idle or inactive pipeline segments to PPTS?

The general rule is this: if the pipe can spill a transported liquid commodity, you should report the mileage. If a pipeline segment has been idled but still contains a transported liquid commodity, it should be included in your reports. If it has been idled and purged – i.e., no longer contains transported commodity – you should exclude it. Please note: the PHMSA Form 7000-1.1 requires you to report idled pipe whether it still contains product or not. [Key words: idle, inactive.]

## How should you report mileage of pipe when you have bought or sold assets during the year?

Agree with the other party to the transfer on a consistent approach – for example, report mileage as of December 31 or prorate mileage for ownership during the year (if you owned the assets for 8 months, report 66% of the mileage). [Other key words: bought, sold, transferred assets.]

## What to Report and How

### How do I fill out the "Incident" survey?

PPTS takes you through filling out the incident survey step-by-step via a web-based application at <http://ppts-survey.api.org/index.asp>. You will need to sign up to participate in PPTS at which time you will also be assigned an account. Please contact API/PPTS staff for more information (Bukky Adefemi at [adefemia@api.org](mailto:adefemia@api.org) or Hazem Arafa at [arafa@api.org](mailto:arafa@api.org)). (You may browse the website, the FAQs and PPTS Operator Advisories without signing up to participate in PPTS or having an account.)

Participants may choose to report incidents as they occur or periodically. Reports should be revised as new information becomes available. The deadline for finalizing each year's information is the last day of February immediately following the reporting year. The President, CEO or top pipeline executive of participating companies will be notified by March 15 if his or her company's reports have not been submitted by the cut-off date.

### What kind of material spilled do I report to PPTS?

The PPTS covers only *transported* liquid commodities in its spill definition. If the material spilled is not covered by the categories listed on the survey, it is a good bet that you need not report it. For example, hydraulic oil from station equipment (*e.g.*, central hydraulic units, valve operators or control valve actuators) should not be reported. Similarly, brine water, which is not a material moved commercially via pipelines, should not be included if spilled.

### What commodities releases should I report to PPTS?

The PPTS system includes all types of commodities regulated under 49 CFR 195.2 "hazardous liquids." The PPTS system does lump commodities into 5 overarching categories:

- (1) **refined products** (liquid hydrocarbons at ambient pressure and temperature),
- (2) **crude oil,**

- (3) **highly volatile liquids** (gases at ambient pressure and temperature; also called HVLs)
- (4) **CO<sub>2</sub> and other non flammables** (gases at ambient temperature), and
- (5) beginning for 2009 incidents, **biofuels** and **ethanol**.

Natural gas liquids (NGL) are HVLs under Part 195 and incidents should be reported to PPTS as such. Anhydrous ammonia (NH<sub>3</sub>) is also an HVL and incidents should also be reported to PPTS as a regulated commodity under Part 195.

Why did PPTS add biofuels as a commodity when they aren't petroleum or petroleum products?

This addition reflects PPTS member companies' transportation of these commodities, as well as PHMSA's interest and intent in collecting information about biofuels. PHMSA has stated that it considers biofuel as a hazardous liquid and subject to reporting under 49 CFR 195. In fact, PHMSA has posted its biofuels policy on its website's home page.

In order to ensure consistent reporting in PPTS, the following clarification is provided.

***Fuel Grade Ethanol*** is ethanol (CH<sub>3</sub>CH<sub>2</sub>OH) that has been blended with a small amount of a substance (usually gasoline) that renders it undrinkable. It is also referred to as denatured ethanol and is used as a blending component with gasoline or gasoline blendstocks for use as a fuel.

Use ***Ethanol Blend*** to report releases of gasoline/ethanol blends in which denatured ethanol has been blended with gasoline or gasoline blendstocks. Specify the type of blend: E85, for instance, is a blend of 85% ethanol and 15% gasoline. E85 would be entered as 85 next to the E already written on the form.

***Biodiesel*** is a fuel produced from animal or vegetable fats. Biodiesel can be blended with petroleum diesel to create a biodiesel blend. Use this to report both biodiesel and biodiesel blends, again with the appropriate blend type noted (i.e., the product called B2 would be entered as a 2 next to the B already on the form).

Use ***Other Biofuel*** to report releases of other fuels made or derived from organic materials.

What spills should I NOT report to the PPTS?

- Truck rack spills within the edge of the canopy;

- Dockside *marine transport* spills; or spills from piping on the marine side of the Coast Guard valve barge, dock];
- Condensate spills from pipelines regulated under 49 CFR Part 192 but not DOT Part 195; [Key word: PHMSA];
- Spills of oil that is not transported for hire, such as hydraulic oil.
- Intentional releases undertaken during maintenance if certain conditions are met:

For liquids: PPTS excludes intentional releases related to maintenance activity if they are not otherwise reportable and if [for liquids] the release is captured, remains under control; does not require clean-up; there is no impact to water, no discernable impact to soil, plants or animals; no injury, death, unintentional fire, or explosion. [Language revised January 2008.]

For HVLs: The release proceeds as intended with respect to rate and duration; does not require clean-up; there is no impact to water, no discernable impact to soil, plants or animals; no injury, death, unintentional fire, explosion.

Can you explain more fully why you chose the demarcations where PPTS ends and non-pipeline modes begin?

PPTS participants are to report on all those assets for which they are the operator, regardless of PHMSA regulations. “Operator” means just that—the company runs day-to-day activities including operation of product movement. Some pipeline companies manage the compliance of PHMSA-regulated assets that are actually operated by, for example, a parent company. In this case, participants report on all assets for which they are the “operator of record.” “Operator of record” means that PHMSA recognizes the pipeline company as responsible. Detailed examples can be found in the PPTS Operator Advisory found at this link [http://www.api.org/Oil-and-Natural-Gas-Overview/Transporting-Oil-and-Natural-Gas/Pipeline-Performance-PPTS/PPTS-Related-Files/~ /media/Files/Oil-and-Natural-Gas/PPTS/Advisories/2007\\_1\\_Advisory\\_Asset\\_Overage\\_Final.ashx](http://www.api.org/Oil-and-Natural-Gas-Overview/Transporting-Oil-and-Natural-Gas/Pipeline-Performance-PPTS/PPTS-Related-Files/~ /media/Files/Oil-and-Natural-Gas/PPTS/Advisories/2007_1_Advisory_Asset_Overage_Final.ashx)

Do you have a diagram of where PPTS reporting begins and ends?

Additional clarifying text can be found in the Advisory linked in the prior question.



PPTS Drawing  
(6).pdf



I am still confused about how, and even if, I am supposed to report certain spills that don't seem to fit the normal operational activities or common assets? Can you help clarify?

There are certain situations that arise that can be confusing, especially if they involve activities that are not experienced by operators or companies every day. API developed PPTS Operator Advisory to help clarify how and if these events should be reported. Advisory 2008-1 can be viewed at the following link [http://www.api.org/Oil-and-Natural-Gas-Overview/Transporting-Oil-and-Natural-Gas/Pipeline-Performance-PPTS/PPTS-Related-Files/~/\\_media/Files/Oil-and-Natural-Gas/PPTS/Advisories/2008\\_1PPTS\\_Operator\\_Advisory\\_CEHS\\_Final.ashx](http://www.api.org/Oil-and-Natural-Gas-Overview/Transporting-Oil-and-Natural-Gas/Pipeline-Performance-PPTS/PPTS-Related-Files/~/_media/Files/Oil-and-Natural-Gas/PPTS/Advisories/2008_1PPTS_Operator_Advisory_CEHS_Final.ashx)

Most importantly, the Data Mining Team is here to help. E-mail your question to Bukky Adefemi at [adefemia@api.org](mailto:adefemia@api.org). She'll get an answer for you from the DMT. She will keep your identity confidential.

How do I report the HVL volume released for a maintenance drain up?

Intentional releases such as those for maintenance may not be reportable. For HVLs,, a maintenance-related release is not reportable to PPTS if:

The release proceeds as intended with respect to rate and duration; does not require clean-up; there is no impact to water, no discernable impact to soil, plants or animals; no injury, death, unintentional fire, explosion.

An *un*intentional release is always reportable if it meets the volume criteria and, if it occurs within a terminal or station, occurs in an area that has been designated as within the reportable boundary: on the terminal side of the Coast Guard valve, on the terminal side of the first valve under a truck rack's canopy, on the terminal side of a rail siding.

I had an HVL release but as part of the response we had to evacuate all of the product between the valves. Do I have to report the volume that was released as part of the response?

The full volume of the HVL release is reportable, not just the volume released unintentionally. We believe that we can learn from the data on the volume released intentionally versus unintentionally, so ***we have added a new question***: "Of the released amount, how much was associated with response (blow-down)?" This question will be used solely for HVL releases.

### What is meant by "Blowdown"?

Blowdown means the intentional release of HVL into the atmosphere as part of responding to or recovering from the incident. Intentional and controlled blowdown implies a level of control of the site and situation by the Operator such that the area and the public are protected during the controlled release.

### How do I report HVL volume-how to convert from lbs to barrels?

Use the volume that was used to repack the line. If you must enter a PPTS report before you know this volume, calculate based on temperature and pressure at the time and location of the release or leave the volume blank and finalize the report after you know the line pack.

### Should I report a release of DRA (Drag Reducing Agent)?

Since DRA is not a transported commodity, it does not need to be reported. If the DRA was already mixed with a transported commodity when released, then it would be reported as a spill of the commodity.

### Should I report dock spills if the spill comes from a barge?

No. The PPTS does not collect data on spills from marine transportation of any kind. [Other key words: barge]

### Should I report dock spills if the spill comes from the piping on the dock?

Everything on the landside of the Coast Guard valve should be reported to PPTS. Everything from the Coast Guard valve to the dock should be excluded. [Key word: marine, dock]

### Should I report truck rack spills?

No. The PPTS does not include truck rack spills of any kind.

Should I report truck rack spills if the spill comes from the piping on the terminal side of the rack?

Yes. The first valve underneath the canopy of the truck rack marks the point where PPTS reporting stops. If you operate or are the operator of record of piping on the terminal side of that valve, you should report to the PPTS (this is regardless of DOT regulatory status). [Key word: PHMSA]

Should I report rail car spills?

No. The PPTS does not include rail car spills.

Should I report rail car spills if the spill comes from the piping on the terminal side of the rail car?

Yes. The first valve at the loading platform for the rail car marks the point where PPTS reporting stops. If you operate or are the operator of record of piping on the terminal side of that valve, you should report to the PPTS (this is regardless of DOT regulatory status). [Key word: PHMSA]

Should I report condensate spills?

If the condensate spill occurred on a 49 CFR 195-regulated line, then you should report it in the PPTS. However, if the condensate spill occurred on a 49 CFR 192-regulated line, you should NOT report it in the PPTS.

Should I report maintenance releases (spills)?

The PPTS' focus is on capturing information about events that we want to prevent. API is collecting information that—when aggregated and analyzed—provides new insights into prevention. Therefore, PPTS can always learn from unintentional releases. However, the PPTS excludes *intentional* releases related to maintenance activity if they are not otherwise reportable and if:

For liquids: PPTS excludes intentional releases related to maintenance activity if they are not otherwise reportable and if [for liquids] the release is captured, remains under control; does not require clean-up; there is no impact to water, no discernable impact to soil, plants or animals; no injury, death, unintentional fire, or explosion. [Language revised January 2008.]

For HVLs: The release proceeds as intended with respect to rate and duration; does not require clean-up; there is no impact to water, no discernable impact to soil, plants or animals; no injury, death, unintentional fire, explosion.

Should I report a spill that occurs on idle or inactive pipe that is not included in the PPTS infrastructure report's mileage?

This release is reportable to PPTS even if the mileage was not reported in the infrastructure report. [Key words: idle, inactive.]

How should incidents on transferred assets be reported?

If the incident occurred while you were the operator, you must report it, even if you no longer own the asset on which you are reporting. [Key words; transferred assets, bought, sold]

What is the reporting threshold?

The tracking threshold is 5 gallons plus any spills to water, and anything that makes the release reportable to PHMSA on a PHMSA 7000-1: fire, explosion, fatality, injury, or damage exceeding \$50,000.

What is the deadline for PPTS submittals?

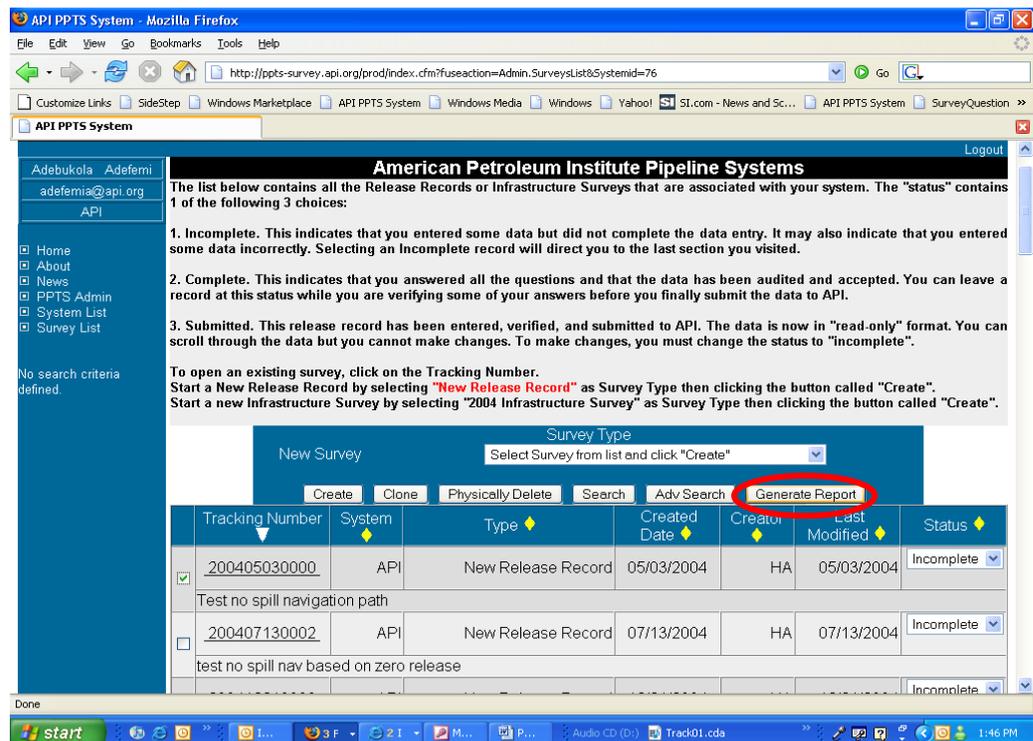
The deadline for all PPTS submittals is the last day in February. "All PPTS submittals" means all incidents reports, the infrastructure survey, and the Data Certification.

Can I print a copy of my incident record?

Yes, select the checkbox next to the incident(s) you want to print then click on the "generate report" button. You will see two drop down options: Report name and Report type.

Under “Report name,” you may choose “Complete Report” (all the questions), “Short report” (just the questions that were answered), or “DIRT report” (for a near-miss reported to DIRT). Under “Report type,” you may choose HTML or PDF. Then choose “Create report(s).” A temporary link will be generated. If you click the link, your report will be displayed and may be printed, or you may download the file at that link for printing later.

See screenshot below. Note that generating the report may take a few minutes.



How can I print a single page/screen from the online release report? Every time I try to print, half the screen is cut off.

To get a single page from the online entry system, use the print page/print screen key on your keyboard. Then open a blank Word or PowerPoint file and paste the screen shot onto the document. This document can then be saved or printed so that it can be filed and/or forwarded to coworkers.

You can also print just one page if, on the page you want to print, you go to File/Print/Current Page

The software keeps insisting that I answer a question that I can't answer.

Some questions—the size of the spill, for example—must be answered and are critical. You must enter these critical facts before you can submit an incident to PPTS. Keep in mind that the deadline for PPTS report submittals is the last day of February of the next year following the incident, so there is time to gather the facts, and in many cases, even make revisions of early estimates. Also, you may enter incomplete information and the PPTS will store the incident record as “incomplete.” When you return to complete the data entry, the system will prompt you on which information is missing. (Look at the list of Survey Parts in the left frame.) The data record must be completed and submitted prior to the filing deadline.

Some questions are not critical and we provide you with the option of choosing “unknown” or “I don't know.” We urge you to come back and fill in these answers at a later date. If you are having trouble tracking down a particular piece of information, contact Bukky Adefemi ([adefemia@api.org](mailto:adefemia@api.org)). She can poll the DMT for suggestions on where you might access the information. Please keep in mind that what the industry learns from PPTS incidents could literally save a life. “Unknown” and “I don't know” are dead ends for learning.

Even if a question allows you to answer “unknown” or “I don't know,” you must still enter the response (“unknown” or “I don't know”) before the incident can be submitted and your data entry be considered complete.

### What about spills to secondary containment?

A spill captured in secondary containment does not negate the reporting requirement. Once the transported material exits the primary containment (basically the pipe or the pipeline system) it is considered a release if it meets the volume threshold. In the perspective of the PPTS, secondary containment is designed to mitigate the impact of a release, but doesn't change the fact that the release occurred. Also, the amount reported should include any volume captured in secondary containment. PPTS requests additional information about the impact of a spill, so you will have an opportunity to report that there were no impacts, if this is the case.

I used to only have to complete all the questions for a spill that is equal to or greater than 5 barrels, now it seems like I always get the “long form” of the survey. What's up with that?

Starting with 2007, all non-gathering incidents reported to PPTS will be recorded using the long form of the survey. The extra information collected allows the industry to learn more from smaller spills. Low volume/low consequence releases from unregulated gathering continue to be reported on Part SM, the short form.

## What is a High Consequence Area (HCA)?

*High consequence area* (HCA) means: (1) A *commercially navigable waterway*, which means a waterway where a substantial likelihood of commercial navigation exists; (2) A *high population area*, which means an urbanized area, as defined and delineated by the Census Bureau, that contains 50,000 or more people and has a population density of at least 1,000 people per square mile; (3) An *other populated area*, which means a place, as defined and delineated by the Census Bureau, that contains a concentrated population, such as an incorporated or unincorporated city, town, village, or other designated residential or commercial area; (4) An *unusually sensitive area*, as defined in § 195.6.

Additional information about HCA's and how to report spills in HCAs can be found in PPTS Operator Advisory 2009-4 at the link below [http://www.api.org/Oil-and-Natural-Gas-Overview/Transporting-Oil-and-Natural-Gas/Pipeline-Performance-PPTS/PPTS-Related-Files/~ /media/Files/Oil-and-Natural-Gas/PPTS/Advisories/2009\\_4PPTS\\_Operator\\_Advisory\\_HCA\\_Reporting\\_Reissue\\_Final.ashx](http://www.api.org/Oil-and-Natural-Gas-Overview/Transporting-Oil-and-Natural-Gas/Pipeline-Performance-PPTS/PPTS-Related-Files/~ /media/Files/Oil-and-Natural-Gas/PPTS/Advisories/2009_4PPTS_Operator_Advisory_HCA_Reporting_Reissue_Final.ashx)

A release occurred in a facility which is physically located in an HCA, but the commodity never got off the property to impact the HCA. How should I report it?

An unintended release that remains in designed containment is still a release. It would be reportable to PPTS and to PHMSA unless it meets the criteria for a maintenance exclusion. If the release originates from a facility that is within the boundaries of an HCA, the HCA questions are answered just as they would be for a spill that reached the ground. Again, the HCA questions in the PPTS survey are about location, not about impact. In another portion of the PPTS survey, it would be reported that 1) the area affected by the release was contained on the company-controlled facility, and 2) there was no impact to water, and, as appropriate for the navigation path depending on spill size, no impact to ecology or soils. Please see Advisory 2009-4 at the URL noted above.

Why do I have to answer so many questions about HCAs?

HCA's are a key aspect in the Department of Transportation's Office of Pipeline Safety's regulations for pipeline integrity. OPS implemented its regulations on "Pipeline Integrity Management in High Consequence Areas" for large hazardous liquids pipeline operators in 2001. The regulations (49 CFR 195.452) require that each operator develop an integrity management program that addresses the risks associated with pipeline segments and facilities that could affect a "High Consequence Area" (HCA). The program must include the identification of each segment or facility that could affect an HCA, a plan for assessing those segments, criteria for remediating

integrity issues, and a process for continual integrity assessment and evaluation. [Other key words: PHMSA]

How can I tell if the HCA was identified versus not identified as a “could affect” segment?

As part of its Integrity Management Program (IMP), each operator was required to document all of its segments and facilities and identify whether they “could affect” an HCA if in fact a release occurred from that segment, hence the name “could affect” segment. Checking the coordinates of the release’s origin with your operator maps (or database) provides the answer. If your plan identified the segment, then the segment was deemed a “could affect”, that is it “could affect” an HCA if a release occurred from it, and you would report it as “identified.” If the segment did not appear in your maps, then the segment was “not identified” and should be reported in that way. We strongly advise that you look at PPTS Operator Advisory 2009-4, which includes clarifying graphics and examples.

[Classifying the segment as “could affect” [an HCA] does not require that the segment be IN or even intersect the HCA. It is classified as “could affect” based on terrain, commodity, models of the spill trajectory, worst case scenarios and other factors.]

How do I determine if the release “reached or occurred in” an HCA?

Another way to phrase this question is, “Is any part of the release (regardless of origin) within the boundaries of a designated HCA?” Did the plume or vapor reach an HCA? This question refers to the product’s spill zone. The coordinates of the spill zone should be compared to the map of polygons and buffer zones created as part of the IMP. Don’t confuse this question with impacting the HCA. There is another area to report that information

My company had a spill that reached an HCA identified as an unusually sensitive area -water. Do I check that box as “identified” and then the rest of the types of HCAs as “not identified”?

Great question and the answer is NO! Only check “not identified” if your IMP plan failed to identify a type of HCA that should have been identified. “Not identified” means that the operator failed to identify the HCA, not that the type of HCA was determined through evaluation to be not applicable. For example, if you identified your HCA as an unusually sensitive area-water, but failed to determine that it was also a commercially navigable waterway, you would check the “identified” box for unusually

sensitive area-water and “not identified” for commercially navigable waterway. ALL OTHER BOXES SHOULD REMAIN BLANK.

There is an abandoned third party line on my property. There was a release from this line, do I need to report it?

You do not need to report a release from something for which you are not the operator of record.

I had a release from a crossing that was over water on a bridge. I’m not sure how to report this crossing.

Use Bridge Crossing if the pipeline is suspended above a body of water or roadway, railroad right-of-way, etc., either on a separately designed pipeline bridge or as a part of or connected to a road, railroad, or passenger bridge.

How do I report different types of crossings?

For PPTS, the different types of crossings are the same as for the PHMSA 7000-1:

Use Bridge Crossing if the pipeline is suspended above a body of water or roadway, railroad right-of-way, etc., either on a separately designed pipeline bridge or as a part of or connected to a road, railroad, or passenger bridge.

Use Railroad Crossing or Road Crossing, as appropriate, if the pipeline is buried beneath rail bed or road bed.

Use Water Crossing if the pipeline is in the water, beneath the water, in contact with the natural ground of the lake bed, etc., or buried beneath the bed of a lake, reservoir, stream or creek, whether the crossing happens to be flowing water at the time of the accident or not.

## Incident Survey Help Text

PART DS: How does API define if the pipeline or facility is interstate or intrastate?

This is not a question that API can answer. This is a legal question, which only your company's legal department can answer.

PART DS: What is meant by a "gathering line"?

**Gathering line** means a crude oil pipeline 8 5/8 inches or less nominal outside diameter that transports petroleum from a production facility.

PART DS: Where can I get information on how to answer the questions referring to HCAs?

For additional guidance on reporting HCA information, you may see 49 CFR Part 195, the [FAQs](#) for PPTS, as well as PPTS Operator Advisory 2009-4 at the link below [http://www.api.org/Oil-and-Natural-Gas-Overview/Transporting-Oil-and-Natural-Gas/Pipeline-Performance-PPTS/PPTS-Related-Files/~ /media/Files/Oil-and-Natural-Gas/PPTS/Advisories/2009\\_4PPTS\\_Operator\\_Advisory\\_HCA\\_Reporting\\_Reissue\\_Final.ashx](http://www.api.org/Oil-and-Natural-Gas-Overview/Transporting-Oil-and-Natural-Gas/Pipeline-Performance-PPTS/PPTS-Related-Files/~ /media/Files/Oil-and-Natural-Gas/PPTS/Advisories/2009_4PPTS_Operator_Advisory_HCA_Reporting_Reissue_Final.ashx)

PART CO: Under the property disrupted or damaged question, what is meant by public place or facility?

Public place or facility includes public roads, highways, churches, schools and other public use/gathering areas

PART PB: What is meant by workers working on the ROW, but NOT associated with this operator?

This is meant to mean people authorized to work in or near the ROW, but not hired by or working on behalf of the pipeline operator. This most often

includes employees of other pipelines or underground facilities operators, or their contractors, working in or near a shared ROW.

PART LD: What is meant by CPM/SCADA based system with automated leak detection (alert/alarm)?

This choice is meant for systems that have specifically designed CPM leak detection in place. If a controller detects a release noticing a rate change or just through experience, then the choice of remote operating personnel should be selected.

PART LD: What is meant by Local operating personnel, procedures or equipment?

In addition to direct employees and contractors of the operator, if through an agreement with another operator that other operator routinely patrols the facility, and that operator finds the release, they are considered “local operating personnel.” In the absence of an explicit agreement for the other operator to patrol the area or facility, this leak should be listed as detected by a “third party.”

PART LD: What exactly is meant by “did the applied leak detection tools, whether human, software, or hardware, perform as expected?”

Leak detection tools as used here is not limited to SCADA CPM Systems. Here, leak detection tools include what is used on the particular system to satisfy the regulatory requirement for leak detection, e.g., manual line balance, hourly tank checks, etc.

PART FA: Some releases could fall under a number of categories for Facility Involved. What should go in “Onshore Terminal/Tank Farm Equipment and Piping”? vs “Onshore Pump/Meter Station Equipment and Piping”?

If the pump/meter feeds from or into the mainline pipeline, enter it as “onshore pump/meter station.” If the pump/meter moves product from tank to tank, enter it as “terminal/tank farm.” For instances where the pump/meter can do both, report based on primary function. Follow help text in PPTS on how to select spills involving pumps vs. tank farms. If under PHMSA jurisdiction, ensure that you use the selection in PPTS for PHMSA for uniformity.

PART FA: I know my pipeline is onshore, but what is the difference among the choices for describing the location?

When the Facility Involved was “Onshore Pipeline,” PPTS asks for a description of the location of the pipeline. The following is an explanation of each:

***Belowground equipment*** means the pipeline was buried and the release occurred while the pipeline was buried.

***Unintentional Exposure*** means that the pipeline was intended to be buried, but at the time of the release, the pipeline was exposed. Some common causes of unintentional exposure are ground shifts or washouts due to heavy rain that cause the earth surrounding the pipeline to move or fall away, thus exposing the pipe.

***Excavation*** means that the pipeline was exposed due to digging or other excavation activity. Think of this category as *intentional* exposure; that is, the reason for the digging or excavation was to expose the pipe. It is possible to choose this box even if the damage to the pipe was not due to the excavation itself.

***Aboveground/belowground transition*** means the area where a pipeline changes from being an aboveground pipeline to an underground pipeline or vice versa.

***Aboveground*** means that the pipe or equipment was designed to be above grade.

***Pipe or equipment located in a vault or can*** means that the pipe or equipment is housed in a designed enclosure. Vaults or cans might be below the grade of the soil, but the pipe or equipment is aboveground within the vault. Integrity specialists have observed vulnerabilities in such locations (corrosion; support for the pipe; designs that trap water), so we are interested in being able to isolate these incidents.

PART FA: What is meant by pipe or equipment in a designed enclosure such as a vault or can?

This choice should be selected when the item involved is in a vault, can or pit designed to provide working space for below grade items such as valves, meters, instrumentation clusters, etc. The enclosure is typically sustained by metal, masonry or concrete supports to provide working space/access.

PART FA: When do I start classifying my “Onshore Pipe, including Valve Sites” (choice 5), as choice 3 or 4 (terminals/tank farms or pump/meter station) instead?

When mainline piping enters a facility, all piping up to an isolation valve should be reported in as choice 5, and all piping downstream of the isolation valve should be classified as choice 3 or 4.

PART FA: Under Item Involved, what is included as a repair sleeve or clamp?

This category includes Type A and Type B repair sleeve, compression sleeve such as Clock Springs, and clamps.

PART FA: Under Item Involved, what is included in the “tubing” category?

Include tubing or tubing fittings: Flexible hoses should be included in the tubing category.

PART FA: What do you mean by “small diameter fitting”?

**Small Diameter Fitting** means a small appurtenance fitting as opposed to a mainline forged fitting. Examples of small diameter fittings would be tubing connections, body bleeds, weldolets, threadolets, welded nipples, etc.

Part PI: What is the difference among leak, rupture and puncture?

**Leak** means a pipe failure resulting in an unintentional release of product, which is often small in size, usually involving a low volume release of commodity.

**Rupture** means a loss of containment event that immediately impairs the operation of the pipeline. Pipeline ruptures have the potential to be severely detrimental to safety and the environment.

**Puncture** means a puncture of the pipeline by a piece of equipment such as would occur if the pipeline were pierced by directional drilling. Not all excavation-related damage will be a “puncture.”

## PART TP: What is meant by the question about entity/activity exempt from applicable One-Call Statutes?

Some government agencies are exempt from one-call regulations or could have decided to “opt out” of the requirements as was the case in Louisiana. If an agency has “opted out,” enter them as entity is exempt. Some exemptions are written in terms of depth: cultivation may be exempt, but only to a depth of 18”. “Yes/activity is exempt, but performance of activity exceeded the limits of the exemption (depth, e.g.)” would be deeper than the prescribed depth. The same may be true of road grading, etc. These answers will help us understand if the statutes need amending, or the damaging party is acting outside of the allowed exemption.

## PART TP: Why am I asked extra questions at the end of entering incidents that involve external force damage?

The liquid pipeline leadership decided that starting with 2007, all PPTS participants will complete information to be submitted by API to the Common Ground Alliance (CGA) for inclusion in its Damage Information Reporting Tool (DIRT). Data common to PPTS and DIRT are automatically gathered from your PPTS submittals, but data unique to DIRT are collected via the add-on module. PPTS participants must submit this extra information for damage-related spills. Other key words: external force damage, excavation damage, mechanical damage]

Please note: Your company may require that submittals to DIRT be made by the company and not API for compliance purposes. If this is the case, check the “No” box when the section asks “You are about to begin the DIRT form. Do you want API to submit your data to CGA?” when completing the add-on module.

Reporting of events that do not involve a release is voluntary. PPTS includes a survey form for DIRT reporting of events that do not include a release. You may access this form from your PPTS entry screen. Under the dropdown menu for “Survey Type” select “Damage Information Reporting Tool,” then click “create.” [See screenshot.](#)

API’s transmittal of data to CGA will be annual, after the May 15 DIRT deadline. Data will be reflected in CGA’s DIRT reports once uploads have occurred. DIRT reports are available from CGA at <http://www.damagereporting.org/annual/>.

[Additional information about DIRT reporting within PPTS is available in these FAQs.](#)

Additional information (User Guide and Mapping) about DIRT reporting is also available on the PPTS website: <http://www.api.org/Oil-and-Natural-Gas-Overview/Transporting-Oil-and-Natural-Gas/Pipeline-Performance-PPTS/PPTS-Related-Files/PPTS-Other-Files.aspx>. Scroll all the way down to the end of the page to access these documents.

PART PW: What is included in “defective tank shell seam”? Does this include a weld on the shell connecting an appurtenance?

Defective tank shell seam is intended to include horizontal and vertical seams, riveted seams, shell-to-bottom welds and appurtenance-to-shell or appurtenance-to-bottom welds.

PART OP: What is an abnormal operating condition?

Your Operator Qualification (OQ) Coordinator can provide assistance in determining if abnormal operating conditions were a cause in the operator error release. This is a question that is limited to releases that are also reported to PHMSA on a Form PHMSA F 7000-1, because the OQ program is a specific regulatory regime. [Other key words: 7000-1

PART OP: What is the difference in the choices under “What was the failure related to”?

Select “***Inadequate procedure or no procedure available***” when a procedure is not in place, was not complete or contained errors, e.g. pipeline locates/markings are done with no specific procedure, each person just does them his/her own way OR the procedure for locating a pipeline does not require verification of pipe location with an electronic locator, probe rod or any other means.

Select “***Failure to follow procedure***” when there is a good procedure but it was not followed, e.g. the procedure for line marking requires the use of a probe rod to verify the physical location of the pipeline, but the person doing the marking chooses not to use one to speed up the process and therefore marks the line incorrectly.

Select “***Incorrect or inadequate historical reference materials***” when something that occurred in the past history of the pipeline, perhaps under a different operator/owner, led to the release and not an issue related to recent changes made by an operator. For example, an operator sends an employee to mark a line and the task was completed according to all procedures, but an unknown abandoned line is marked instead of the active line. If historical information did not show the abandoned line, this choice should be marked. In contrast, if a known project was completed and documentation was not properly updated, attribute the incident to either no procedure or procedure not followed, as appropriate. Other examples of incorrect or inadequate historical reference materials could include drawings that identify an ANSI #150 system as ANSI #300, incorrect strapping tables from much earlier construction, and undocumented equipment.

PART OP: I have an operator error accident and I'm trying to categorize the type of activity my worker was doing. What's the difference between "Routine Maintenance and "Other Maintenance"? Similarly, what is the difference between "Routine Normal Operating Conditions" and "Non-Routine Operating Conditions"?

Please note that these questions are not limited to releases that are also reported to PHMSA – they are not OQ-specific.

***Routine Maintenance*** are those activities that operators expect, are recurring, and for which your company probably has a maintenance schedule or inspection plan.

***Other Maintenance*** activities are those that are performed on an as-needed basis. For example, valves and seals leak, but operators generally don't schedule their replacement as a routine maintenance task. Additionally, maintenance work completed after finding an anomaly or after a release event would be considered "Other Maintenance." [Other key words: operator error]

Like routine maintenance, ***Routine Normal Operating Conditions*** are activities that an operator plans and expects to encounter under normal operations with some regularity, like operating valves, and taking tanks receipts. Normal operations tasks are what your operations worker in the field answers when someone asks "What do you do on a typical day?" Include launching and receiving maintenance pigs (or ILI pigs) if runs are frequent.

***Non-Routine Operating Conditions*** activities are those that occur during the operation of the pipeline, but are infrequent or one-time events. Examples of non-routine operating conditions might include: re-routing around a pump station that is temporarily off-line; testing new equipment in the field; reversing flow in a line that is not normally run bi-directionally; pressure reductions to accommodate repair activities; launching and receiving internal inspection pigs, if the runs are infrequent.

PART OP: I don't understand the question, "How was the activity that caused the release controlled?"

The question is referencing the physical location of the individual involved in the release. Did someone put hands on a valve? If yes, the activity was "local control." If someone from a control room, even if on the same property as the valve, operated the valve, then it is remote.

PART OP: I've never had to fill out anything about OQ, where do I even get started with answering these questions?

Your Operator Qualification (OQ) coordinator should be able to provide assistance in answering the questions in this section. Every operator subject to PHMSA's Part 195 has one, and the terms used in these questions are all part of the regulatory regime for OQ.

## The Dirt on DIRT

### What is DIRT?

The Common Ground Alliance (CGA), a coalition of stakeholders that operate or work around underground assets, created the Damage Information Reporting Tool (DIRT) to record incidents and near-misses resulting from activities around the assets. The hazardous liquids pipeline industry is just one of the types of entities that participates in CGA and contributes incident data to DIRT. Other types of pipelines, utilities, telecommunications operators and excavators are among the other stakeholders in CGA.

To facilitate the hazardous liquids pipeline industry's participation in DIRT, we have incorporated a DIRT module in PPTS. This makes PPTS a one-stop shop for reporting excavation damage incidents both to DIRT and to PPTS. API uploads the DIRT incidents to CGA-DIRT annually.

### Are there any FAQs available on DIRT reporting and definitions?

The FAQs available in this document cover some of the issues that arise in including DIRT reporting in PPTS. DIRT has also prepared its own User Guide, which is the primary source of information on DIRT reporting. It is available at

<https://www.damagereporting.org/dr/control/userGuide.do>

The User Guide is intended to assist users of the DIRT in selecting the proper entries as the form or computer entry is completed. This will help ensure a common understanding of the data fields, which in turn will make analysis of the data more useful and meaningful. PPTS participants are especially encouraged to consult the DIRT source material because nomenclature used in DIRT differs from pipeline industry conventions.

### How is filling out DIRT within PPTS better than just filling out the DIRT form?

You and your colleagues will only be entering information once. This minimizes the time spent and the room for errors. Importantly, it also provides an opportunity for the

oil pipeline industry to learn from the information you're submitting to DIRT by conducting its own analyses of the oil pipeline damage data. (Most DIRT compilations combine different types of operators, but the hazards for telecommunications companies and gas utilities, for instance, are not necessarily the same as those for oil pipelines.)

Is the information supplied to DIRT via PPTS as complete as the information that would be supplied directly to DIRT, or is it "DIRT-Lite"?

The DIRT organization has certified that the combined reporting system is fully compliant with DIRT reporting requirements. Please contact us if you need a copy of this communication.

How often will API upload the entries to DIRT? [

Annually, after the DIRT deadline of May 15.

Does this mean I have until May 15 to file my PPTS-DIRT incidents?

NO, it does not. The deadline for filing a release in PPTS is still the last day in February. Both the PPTS and the DIRT portion of any *releases* must also be submitted by the last day in February. (Remember, the PPTS portion cannot be submitted until the DIRT portion is also complete.) For incidents that are not reportable to PPTS but are reportable to DIRT, such as any incident (or event) that involves contact with the pipe but no release, or one that involves the potential for contact (such as people excavating in the Right-of-Way with no one-call or line locate marks), the DIRT deadline applies: May 15.

I understand that DIRT also receives reports of incidents that don't result in a release. How will I put those into PPTS?

We have created a new type of survey in PPTS for any incident (or event) that involves contact with the pipe but no release, or one that involves the potential for contact (such as people excavating in the Right-of-Way with no one call or line locate marks). Neither of these types of incidents would be reportable to the traditional PPTS form, which is focused on releases. These non-release incidents will be stored in a different file on the API server, and will have a different set of Survey IDs, so they won't be confused with incidents that involve a release. They won't be used in calculating your company's PPTS performance record. However, they will provide useful new metrics on external force damage to pipelines for the industry.

To access this new survey, “**Damage Information Reporting Tool (DIRT)**” you’ll log into PPTS in the regular way and then from the drop down menu for “Survey Type,” select “Damage Information Reporting Tool (DIRT),” then click “Create.” See the screen below.

The screenshot displays the API PPTS System interface. The main heading is "American Petroleum Institute Pipeline Systems". Below the heading, there is a message: "The list below contains all the Release Records or Infrastructure Surveys that are associated with your system. The 'status' contains 1 of the following 3 choices:"

- 1. Incomplete.** This indicates that you entered some data but did not complete the data entry. It may also indicate that you entered some data incorrectly. Selecting an Incomplete record will direct you to the last section you visited.
- 2. Complete.** This indicates that you answered all of the questions and that the data has been audited and accepted. You can leave a record at this status while you are verifying some of your answers before you finally submit the data to API.
- 3. Submitted.** This release record has been entered, verified, and submitted to API. The data is now in "read-only" format. You can scroll through the data but you cannot make changes. To make changes, you must change the status to "incomplete".

Instructions for opening and creating surveys are provided:

- To open an existing survey, click on the Tracking Number.
- Start a New Release Record by selecting "New Release Record" as Survey Type then clicking the button called "Create".
- Start a new Infrastructure Survey by selecting "2004 Infrastructure Survey" as Survey Type then clicking the button called "Create".

The "New Survey" form is open, showing a dropdown menu for "Survey Type" with the following options:

- Select Survey from list and click "Create"
- 2005 Infrastructure Survey
- 2006 Data Certification
- 2006 Infrastructure Survey
- Damage Information Reporting Tool (DIRT)
- Newest Release Record
- Select Survey from list and click "Create"

The table below shows the survey records:

Tracking Number	System	Type	Last Modified	Status
200405030000	API	New Release Record	05/03/2004	Incomplete
200407130002	API	New Release Record	07/13/2004	Incomplete

Am I required to enter reports of incidents that don't result in a release?

[Key words: near-miss] Entering the reports of incidents or events that don't result in a release is done on a voluntary basis. While there is no PPTS requirement, you are highly encouraged to enter these incidents and events so that both DIRT and PPTS can analyze the data and compile learnings from these incidents.

I enter the PPTS information, but someone else submits my company's information to DIRT. How will that work?

You're not alone with this situation. It will be up to each company to coordinate reporting for PPTS and DIRT and get all of the information into the PPTS system. API will be pleased to help facilitate the process. For instance,

1. Your colleague who collects and submits the information to DIRT can provide that information to you and you can enter it into the PPTS/DIRT system; OR
2. API can provide your colleague with access to the PPTS system so that you can enter the PPTS information, provide your colleague with the pertinent Survey ID, and your colleague can then log on to the PPTS system and enter the DIRT-related reporting elements for each incident. Your colleague could also log on to the system to report any of the non-release incidents that aren't reportable to PPTS. This work flow will allow individuals to complete their tasks at their own pace. Remember that you will not be able to submit a release that involves mechanical damage to PPTS until both the PPTS portion and the DIRT portion of the record are complete. You and your colleague will want to make sure you have clarified any mechanisms you need to close the loop on submittals.

My company operates in a state where DIRT reporting is required by statute. My boss says I can't report through PPTS. What should I do?

We've taken care of this by providing a check box if you wish to report the incident directly to DIRT. You'll still enter the incident into the PPTS/DIRT system, but API won't include your incident in its upload to the DIRT server. Please give us a call if there are other concerns that we need to address in this regard.

My company operates in a state that has an electronic reporting system for DIRT. How will that work with PPTS reporting?

This issue has only recently been pointed out. API and the Data Mining Team are working with states and state pipeline regulators to minimize the reporting burden and the potential for duplicate reports submitted to DIRT.

How do I confirm that my incident has been submitted to DIRT?

You won't be able to find your incident by your company name because all of the incidents from API are submitted under the API's name. Each incident has a unique ID, however. (Contact Bukky Adefemi at [adefemia@api.org](mailto:adefemia@api.org).) You can use that numerical ID in communications with CGA-DIRT, including getting a print out of what was submitted.

### Can I print out a copy of my DIRT report?

You can print out a copy of your whole PPTS-DIRT release record which will include both the PPTS portion and the DIRT module. In addition, you can print out a copy of any near-miss (no release) report submitted as a DIRT survey to PPTS. Use the same procedure as PPTS to “[generate report](#).” (Follow the hyperlink to see a screenshot of the procedure.)

When API uploads the DIRT reports to CGA-DIRT, the program “maps” some information that you provide in the PPTS portion of the record as answers to the DIRT questions. Thus, the print out of just the DIRT module will not represent all of the information that API provides on your releases to CGA-DIRT. In contrast, any print out of a near-miss report will have all of the information that API transmits to CGA-DIRT.

My boss wants to know exactly how the information submitted to PPTS is being transferred to fill in the DIRT form. What goes where?

We’ve created a file that shows all of the “mapping” from PPTS to DIRT. ([Click here to find](#). Please scroll all the way down to see the document.) There are a few places where the PPTS question is slightly different from a similar DIRT question, and the DIRT organization has approved our mapping. Where there is no one-to-one mapping possible or where DIRT requests information not available from PPTS, we will ask you or your colleagues to enter that information.

Will I have to register with DIRT?

No. With this batched upload system, you will not be required to communicate directly with DIRT at all.

Please note that indexed words are only listed once per page, regardless of how many times they appear on the referenced page. Also, plural versions of a word are commonly indexed under the singular: “pumps” is under “pump,” for example.

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