

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

Pipeline Strategic Data
Tracking System
(formerly known as PPTS)

PIPELINE STRATEGIC DATA TRACKING SYSTEM

Frequently Asked Questions

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DON'T FIND WHAT YOU NEED?

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You may access these FAQs online at http://www.api.org/~media/Files/Oil-and-Natural-Gas/PPTS/PPTS_FAQs_Indexed.pdf .

Background on PSDTS

What is PSDTS?

The Pipeline Strategic Data Tracking System (PSDTS), formerly known as the Pipeline Performance Tracking System (PSDTS) 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 PSDTS. 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 PSDTS and undertakes analytical work based on both the DOT PHMSA's data and the PSDTS 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 PSDTS?

Participation in PSDTS 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 PSDTS. There is no fee for participation in PSDTS.

[Click here for a list of participating operators.](#) They operate about 70% 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 PSDTS online?

The URL for PSDTS, including copies of these FAQs, other documents is www.api.org/PPTS. The data entry system itself is located at <https://PPTS.api.org/Blue PPTS>

What assets are covered in the PSDTS?

The former PPTS participants provided performance information for all the assets they operate, regardless of if those assets fell under the regulatory oversight of the U.S. DOT Office of Pipeline Safety or not. The PSDTS participants however, provide performance information for unregulated gathering under PHMSA Part 195 and all assets operated under the regulatory oversight of the U.S. DOT Office of Pipeline Safety.

What is the "Incident" survey?

Incident surveys are collected annually for any incidents that meet PSDTS reporting thresholds and excavation incidents reported to the Common Ground Alliance. [Click here to see a copy of the incident survey for releases](#). Thus, within the PSDTS structure, participants can report incidents that are reportable to DIRT regardless of if there was a release or not. ([Click here for more on DIRT](#).)

What is the "Infrastructure" survey?

For each reporting year, PSDTS 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 PSDTS is assigned a unique identifier (System ID). PSDTS 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 https://PPTS.api.org/Blue_PPTS, 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 PSDTS?

Contact Bukky Adeiya at (202) 682-8548 or adeiyaa@api.org if you require access to the data entry portion of PSDTS. [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 PSDTS differentiate DOT from non-DOT spills?

Yes, PSDTS will use the question "Is the pipeline or facility an unregulated gathering line under Part 195 or its state equivalent?" 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?

PSDTS 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 PSDTS?"

The Data Mining Team writes "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](#)

PSDTS Infrastructure Report

What do you mean by ethanol service? (Part B – Q2F)

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 Part B - Q2L 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? (Part B - Q2K)

Dedicated biofuel, such as biodiesel.

Does PSDTS want my Non-DOT Regulated tanks and terminals?

No. PSDTS collects release data only on unregulated crude gathering lines and DOT assets.

Which tanks should I report?

DOT regulated tanks.

What are barrel-miles? (Part C)

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

How should I report Total miles analyzed in the five years (Part F – 1L)?

Report total mileage (combining totals of crude, HVL, product, CO2). Do not double-count mileage if more than one type of tool is used in a segment, or a segment is re-run with the same type of tool. **Total mileage should not exceed system mileage.**

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 PSDTS 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

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

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.]

Activity Survey

For Integrity Management Spending for Pipelines and Facilities (excluding tanks), what should be included for Evaluation spending?

This dollar amount should include risk analysis, system data review and analysis, licensing, modeling development & review, plus in-house costs such as employee time, and other costs associated with carrying out requirements in 49 C.F.R. §452

For Integrity Management Spending for Pipelines and Facilities (excluding tanks), what should be included for Inspection spending?

This dollar amount should include ILI spending (cleaning, system modification to allow ILI, waste disposal, ILI tool runs and analysis), other forms of nondestructive examination (not including hydrotesting), over flights, digs not resulting in maintenance or repair plus in-house costs such as employee time.

For Integrity Management Spending for Pipelines and Facilities (excluding tanks), what should be included for Maintenance spending?

This dollar amount should include maintenance, repair, dig costs resulting in maintenance or repair plus in-house costs such as employee time.

Which Storage Tanks should be counted for Safety/Integrity Management?

Include both PHMSA-regulated storage tanks and unregulated storage tanks

For Integrity Management Spending for Storage Tanks, what should be included for Evaluation spending?

This dollar amount should include risk analysis, system data review and analysis, licensing, modeling development & review, plus in-house costs such as employee time. Include all tanks with transported commodity. Only include costs for tanks that you own and operate.

For Integrity Management Spending for Storage Tanks, what should be included for Inspection spending?

This dollar amount should include all costs associated with inspection or examination including routine tank checks, API 653 in-service and out of service inspections, tank cleaning, waste disposal, plus in-house costs such as employee time. Include all tanks with transported commodity. Only include costs for tanks that you own and operate.

For Integrity Management Spending for Storage Tanks, what should be included for Maintenance spending?

This dollar amount should include maintenance and repair costs (including painting and internal lining), plus in-house costs such as employee time. Only include costs for tanks that you own and operate.

How do I count the Number of Integrity-Related Digs for the CY?

If one dig is conducted to review several actionable anomalies, count as 1 dig in this field. Exclude calibration and probability of exceedance digs. Include digs resulting in repairs in this count.

What is counted in the Number of Repairs Related to Integrity-Related Digs for the CY?

Generally, a repair in this context will include a mechanical fix of some kind – a sleeve or clamp, for instance – that restores the pressure containing capability of the pipe. A “repair” is more than a buff-and-recoat of excavated pipe.

What is counted in the Number of Integrity-Related Digs Resulting in Repairs for the CY?

The total number of digs, which could allow for more than one repair per dig.

For Public Awareness Spending for the CY, what should be included for Complying with PHMSA Public Awareness Requirements?

Report only spending required by PHMSA regulations 49 C.F.R. § 440. This includes meetings with excavators, emergency responders, public officials, and the public, as well as direct mail, advertisements about 811, etc.

How about “Not Required Other Public Awareness Spending”?

Report all other not-required or voluntary spending to advance public awareness.

What is considered “New Transmission” added into service for the calendar year?

This includes only new pipelines, tanks and facility constructions. Tanks or facilities do not necessarily have to be connected to new pipelines. Upgrades or enhancements should not be included here.

How does API define “Firm Commitments”?

Firm commitment refers to projects that have been planned, approved, and on schedule to begin construction for the calendar year.

For Research and Development, what should be included in the CY spending on pipeline research and development outside PRCI contributions?

Include areas of pipeline integrity, leak detection, engineering and emergency response. Consider expenditures claimed for the R&D tax credit available in system’s jurisdiction, R&D joint industry projects, sole-source research projects, payments to affiliated corporate research organization (e.g. Imperial Oil using ExxonMobil Research), and cost of internal employees, resources, and overhead.

What to Report and How

How do I fill out the "Incident" survey?

PSDTS takes you through filling out the incident survey step-by-step via a web-based application at https://PPTS.api.org/Blue_PPTS. You will need to sign up to participate in PSDTS at which time you will also be assigned an account. Please contact Bukky Adeiya at adeiyaaa@api.org or Hazem Arafa at arafa@api.org. (You may browse the website, the FAQs and PSDTS Operator Advisories without signing up to participate in PSDTS or having an account.)

On a quarterly basis, incidents reported to PHMSA is uploaded into the PSDTS for participants. Participants may then choose to complete those incidents on a quarterly basis or at the end of the reporting year. Incidents that occur on unregulated crude gathering assets need to be manually entered into the PSDTS. Reports may need to be revised if the data imported is not the final data submitted to PHMSA, or 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 PSDTS?

The PSDTS covers only *transported* liquid commodities as reported to PHMSA. 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 PSDTS?

The PSDTS system includes all types of commodities regulated under 49 CFR 195.2 "hazardous liquids." The PSDTS 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) **CO₂ 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 PSDTS as such. Anhydrous ammonia (NH₃) is also an HVL and incidents should also be reported to PSDTS as a regulated commodity under Part 195.

In order to ensure consistent reporting in PSDTS, the following clarification is provided for Biofuels.

Fuel Grade Ethanol is ethanol (CH₃CH₂OH) 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 PSDTS?

For liquids: PSDTS 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.

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.

Should I report condensate spills?

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

Should I report maintenance releases (spills)?

The PSDTS' 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, PSDTS can always learn from unintentional releases. However, the PSDTS excludes *intentional* releases related to maintenance activity if they are not otherwise reportable and if:

For liquids: PSDTS 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 PSDTS infrastructure report's mileage?

This release is reportable to PSDTS 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 PSDTS submittals?

If you plan to participate in the API Awards program, the deadline for all PSDTS submittals is the last day in February. "All PSDTS submittals" means all Incidents reports, the Infrastructure Survey, and the Data Certification.

Otherwise, the deadline for PSDTS Incidents and Data Certification is the last day in February while the deadline for the Infrastructure Survey is April 1.

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 PSDTS. Keep in mind that the deadline for PSDTS 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 PSDTS 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. The data record must be completed and submitted prior to the filing deadline.

Some questions are not critical and so we urge you to come back and fill in these answers later. If you are having trouble tracking down a piece of information, contact Bukky Adeiya (adeiyaa@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 PSDTS 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 PSDTS, 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. PSDTS 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 PSDTS 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 PSDTS 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

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 PSDTS 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 PSDTS survey are about location, not about impact. In another portion of the PSDTS 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?

HCAs 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 PSDTS 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 PSDTS, 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: Estimated Date/Time when the release first started

This question may or may not be the same with PHMSA's 7000-1 Question A9. This question is not about when the release triggered a PHMSA report.

The answer to this question should be estimated by the Operator as the earliest time or time of incident when the product was released to the ground or atmosphere from the pipeline/facility as best they can.

PART DS: Date/Time when release was initially detected by the Operator

This is the time when the Operator suspects, due to various indicators, that a situation where an unintentional release may be occurring/or has occurred.

Assume this question is the time when an Operator first suspects that a release may have occurred and has decided to take some action to either confirm or rule out an unintentional release.

PART DS: Date/Time when release was confirmed

The time that the release has been located and/or the Operator has established without a doubt that the pipe/facility has experienced an unintentional release (or fire, if the release was minimal or burned, but still meets PHMSA reporting requirements).

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 PSDTS, as well as PSDTS 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

PART CQ: 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: Date/Time when Control Center/Operations Center action was taken

This may or may not be a shut-down time. For example, the pipeline system could already be down, and the control center receives a call from a 3rd party saying they smell gasoline, the line is down so the control center would notify the field and that would be their initial action.

PART LD: What prompted the Control Center to take operational action?

This is like the question "How was the release initially detected?"; however, this is specific to the Control Center only. Oftentimes the response to these two questions will be the same, but not in every case.

PART LD: Was the release confirmed by?

This refers to the party or system that located the release and/or that confirmed without a doubt that the pipe/facility has experienced an unintentional release.

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

This choice is meant for systems that have SCADA 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, including Contractors?

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 or 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 LD: What was the maximum estimated release rate before mitigating steps were taken in response? Please provide both barrels per hour and as a % of flow?

This is about the point and time of the release and is only related to **mainline pipeline**.

The release rate in Barrels/hour and the % of the pipeline's throughput at the time of the release. For instance, a pipeline has a flow rate of 100 bbls/hr when it experiences a leak with a rate of 10 bbls/hr. The releases' % of flow at the time of the release would be 10%.

In the case of a slow leak/weep where the weep rate cannot be estimated, enter zero.

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. If under PHMSA jurisdiction, ensure that you use the selection in PHMSA for PSDTS for uniformity.

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 EX: 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 EX: 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 PSDTS 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 PSDTS and DIRT are automatically gathered from your PSDTS submittals, but data unique to DIRT are collected via the add-on module. PSDTS 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. PSDTS includes a survey form for DIRT reporting of events that do not include a release. You may access this form from your PSDTS entry screen. Under the dropdown menu for “Survey Type” select “Damage Information Reporting Tool,” then click “create.”

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 PSDTS is available in these FAQs.](#)

Additional information (User Guide and Mapping) about DIRT reporting is also available on the PSDTS 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 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: 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 “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, ***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’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 PSDTS. This makes PSDTS a one-stop shop for reporting excavation damage incidents both to DIRT and to PSDTS. 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 PSDTS. DIRT has also prepared its own User Guide, which is the primary source of information on DIRT reporting. It is available at

<https://www.cga-dirt.com/dr/html/userGuide.html>

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. PSDTS 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 PSDTS 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.)

How often will API upload the entries to DIRT?

Annually, after the DIRT deadline of March 31st.

Does this mean I have until March 31st to file my PSDTS-DIRT incidents?

NO, it does not. The deadline for filing a release in PSDTS is still the last day in February. Both the PSDTS and the DIRT portion of any *releases* must also be submitted by the last day in February. (Remember, the PSDTS portion cannot be submitted until the DIRT portion is also complete.) For incidents that are not reportable to PSDTS 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: March 31.

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

We have created a new type of survey in PSDTS 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 PSDTS 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 PSDTS 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 PSDTS in the regular way, click on **Form** under the **My Space Bar** and then click **Create** in the middle of the page. From the drop down menu for "Please select a form to create," select "Damage Information Reporting Tool (DIRT)," then click "Create Form"

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 PSDTS requirement, you are

highly encouraged to enter these incidents and events so that both DIRT and PSDTS can analyze the data and compile learnings from these incidents.

I enter the PSDTS 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 PSDTS and DIRT and get all of the information into the PSDTS 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 PSDTS/DIRT system; OR
2. API can provide your colleague with access to the PSDTS system so that you can enter the PSDTS information, provide your colleague with the pertinent Survey ID, and your colleague can then log on to the PSDTS 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 PSDTS. 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 PSDTS until both the PSDTS 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 PSDTS. 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 PSDTS/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 PSDTS 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 Adeiya at adeiyaa@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 PSDTS-DIRT release record which will include both the PSDTS 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 PSDTS. Use the same procedure as PSDTS to generate report

When API uploads the DIRT reports to CGA-DIRT, the program "maps" some information that you provide in the PSDTS 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.

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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