

# *Just the FAQs*

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# What's New

- FAQs revised and updated late 2006
- Streamlined existing answers
- Added questions for recent PPTS changes
  - Long Form
  - DIRT



# General FAQs Highlights

- Report data for all operated facilities, not just DOT regulated ones
- Incident reports may be added
  - As they occur, or
  - Periodically, or
  - Annually
- Deadline for reports is last day of February (hooray for leap year!)

**\*\*NEW\*\*** CEOs will be notified  
Mar 15 if reports are not entered



# Technical FAQs Highlights

## What to Report

- Report *transported* liquid commodities
- Four broad categories
  - Refined Products
  - Crude Oil
  - Highly Volatile Liquids
  - CO2 and other Non Flammables
- Threshold for reporting is 5 gallons plus any spills to water.

# Technical FAQs Highlights

## What to Report

- Should you report the following? **NO!!!!**
  - Spills under the truck rack canopy
  - Marine transport spills on the marine side of the Coast Guard valve
  - Condensate spills from lines regulated by DOT part 192 but not DOT part 195
  - Spills of liquid not transported for hire
  - Some small intentional releases

# Technical FAQs Highlights Software

- You can print a report after you enter the incident data (FAQs contain step-by-step)
- Questions that do not have an "I don't know" option are "must answer"
- The reporting software does not recognize decimals in mileage
  - Round numbers up to avoid error messages from the software

# Technical FAQs Highlights

## Infrastructure

- Should idle or inactive pipe mileage be reported?
  - Yes if it is laid down in product or can otherwise still spill a transported liquid commodity
- Mileage of assets bought or sold
  - Approach of both parties should be consistent
  - Report as of December 31 or prorate, as long as both parties do the same thing

# Technical FAQs Highlights

## New Items

- Starting in 2007, ALL non-gathering and regulated gathering incidents will be on the long form
- Third party damage incidents will have extra questions for populating DIRT



**Let's Play**  
**IS THIS REPORTABLE?**

# Is this reportable?

- 5 barrels of gasoline leak out of a tank fitting—the entire 5 barrels is contained inside the tank dike wall

YES

Spills inside  
containment are  
reportable



# Is this reportable?

- A drum develops a leak and 10 gallons of hydraulic fluid are spilled inside a concrete containment area

No

Spills of non-transportable liquids are not reportable



# Is this reportable?

- A fitting on a mainline meter skid fails and 6 gallons of crude oil is spilled inside a concrete containment area

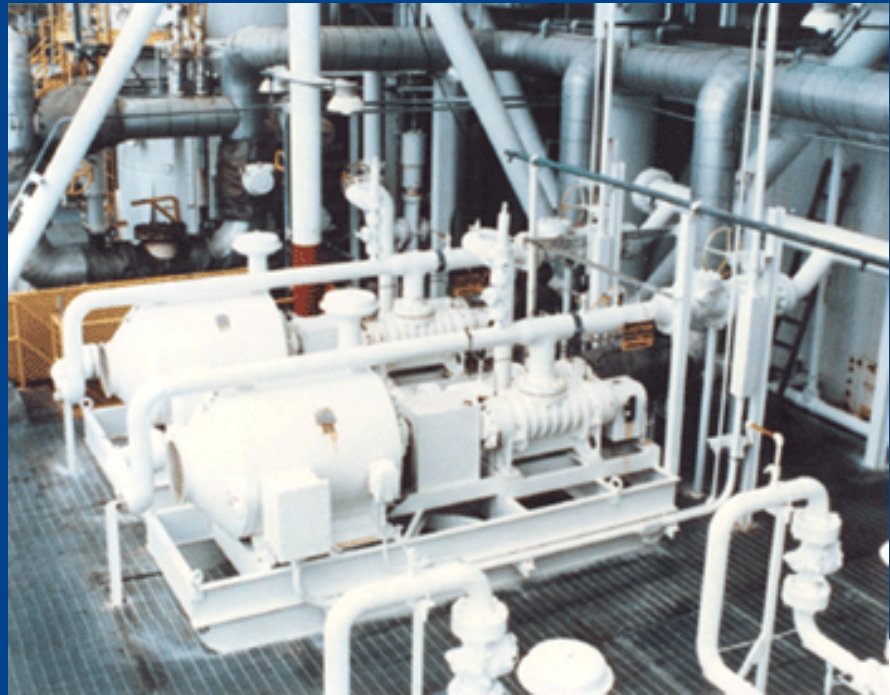
YES



# Is this reportable?

- 6 gallons of crude oil are released to the sump from a pump seal leak

No, leaks that remain in the system are not reportable



# Is this reportable?

- 4 barrels of gasoline spills from a truck rack meter

No, spills under the truck rack are not reportable



# Is this reportable?

- Some drag reducing agent (DRA) is released from a fitting on the DRA tank and spills over the containment

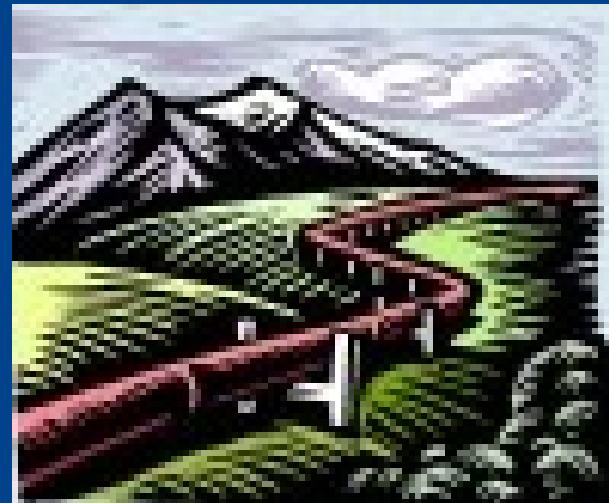
No, DRA spills are not reportable



# Is this reportable?

- Your company sold a pipeline and a mainline release was discovered shortly after the other company assumed operation—the release took place before the change

Yes, the operator at the time of the spill – the seller – should report the release



# PPTS Coverage #1: Basics + Tanks

- The Basics
  - Mainline pipeline, valves, traps - yes
  - Pump Stations, metering, and manifolds -yes
- A Tank that is . . . .
  - Owned and operated by the pipeline company - yes
  - Operated *but not owned* by the pipeline company - yes
  - Owned *but not operated* by the pipeline company -no
  - Neither owned nor operated by the pipeline company but part of system, owned by an affiliate - no

# **PPTS Coverage #2: Terminal Piping & Facilities + Other Modes**

- **Terminal Piping and Facilities . . .**
  - From the pipeline to the tanks - yes
  - Between the marine dock and the tanks - yes
  - Between the truck rack and the tanks - yes
- **Other Modes**
  - Truck rack facilities - no
  - Barge/ship dock facilities - no

# PPTS Coverage #3: Asset Status

- An Asset that . . .
  - Was abandoned and evacuated (not in PPTS infra.) - no
  - Was purchased but never operated (not in PPTS infra.) - no
  - Was sold (by you), and an incident that occurred BEFORE the sale was discovered AFTER the sale – seller reports
  - Was out of service for maintenance when the release occurred (such as tank cleaning and repair) - yes
  - Where historical release is found during maintenance and repair - report if PHMSA 7000-1 was filed, if there was a further release during repair, if <3 years old
  - Is not regulated by DOT - yes
  - Is not regulated by any agency – yes

# PPTS Coverage #4: Containment + Other Puzzles

- A Release that was contained . . .
  - In a sump - no
  - In designed concrete containment that has no impact to soil/water/air - yes
  - Within the tank dike *without* a liner - yes
  - Within a tank dike *with* a liner - yes
  - Release that has no impact to soil/water/air - yes
- A Release that occurs during maintenance activity; <5 barrels; captured; does not require clean-up; no impact to environ., etc. - no
- A Release of <5 gallons but property damage exceeds \$50,000 (only DOT reportable due to \$'s) - yes

**Any questions on the  
Frequently Asked Questions?**

**Any questions that we missed  
in the Frequently Asked  
Questions?**