

Getting the Answers Right: Clarifications

*Releases in HCAs
IMP Activities
Asset Coverage*

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A Joint Presentation at the
PPTS Workshop

Reporting Releases in HCAs

*** High Consequence Areas**

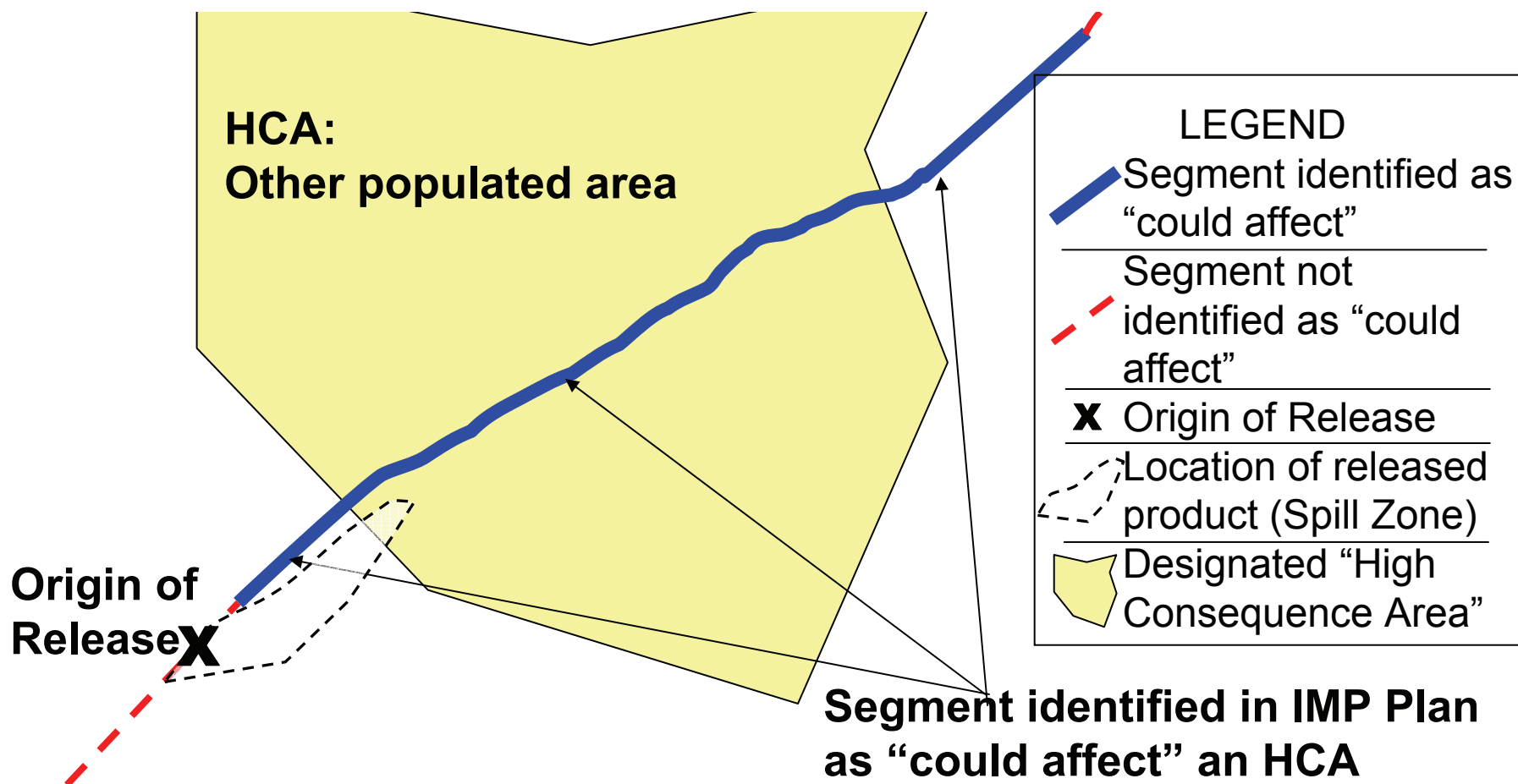
- High Population, Other Populated Area, Comm'ly Navig. Waterway, Unusually Sensitive Area (environment, water)

*** Why: measure impact; progress; effectiveness; need for change**

*** Questions:**

- Did it originate from a “could affect” segment or facility [look at the *origin*],
- Did it reach or occur in an HCA [look at the *spill zone*],
- If yes, what type of HCA, and had you identified that possibility [back to the maps]
- Part 195-specific; *do not apply to unregulated facilities*
- *Not asking about environmental impact*

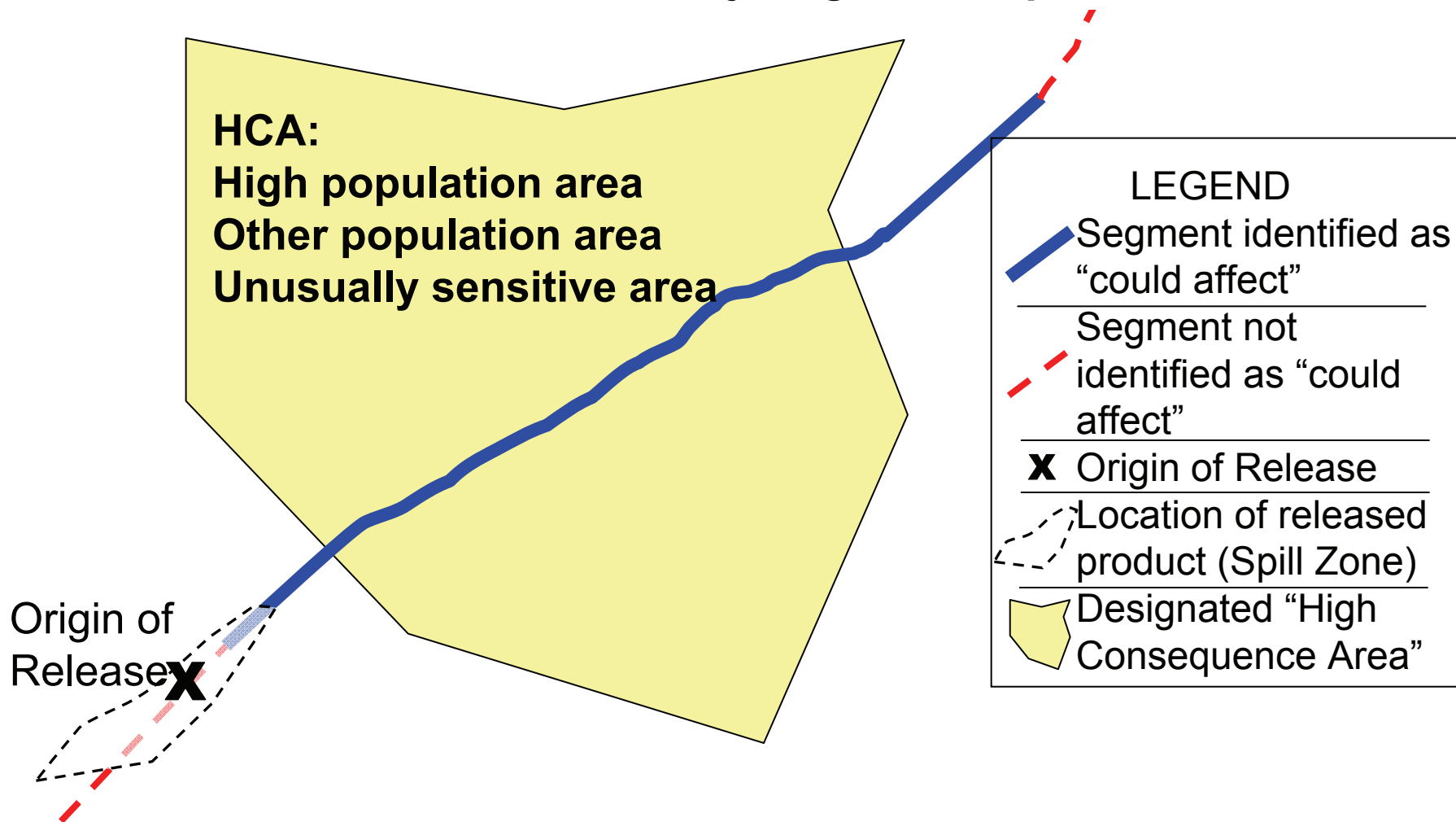
**Originate from a facility or pipeline segment identified as one that
“could affect” any “high consequence area”? NO**
Reach or occur in any “high consequence areas”? YES
What type? OTHER POPULATED AREA
Identified? NOT IDENTIFIED





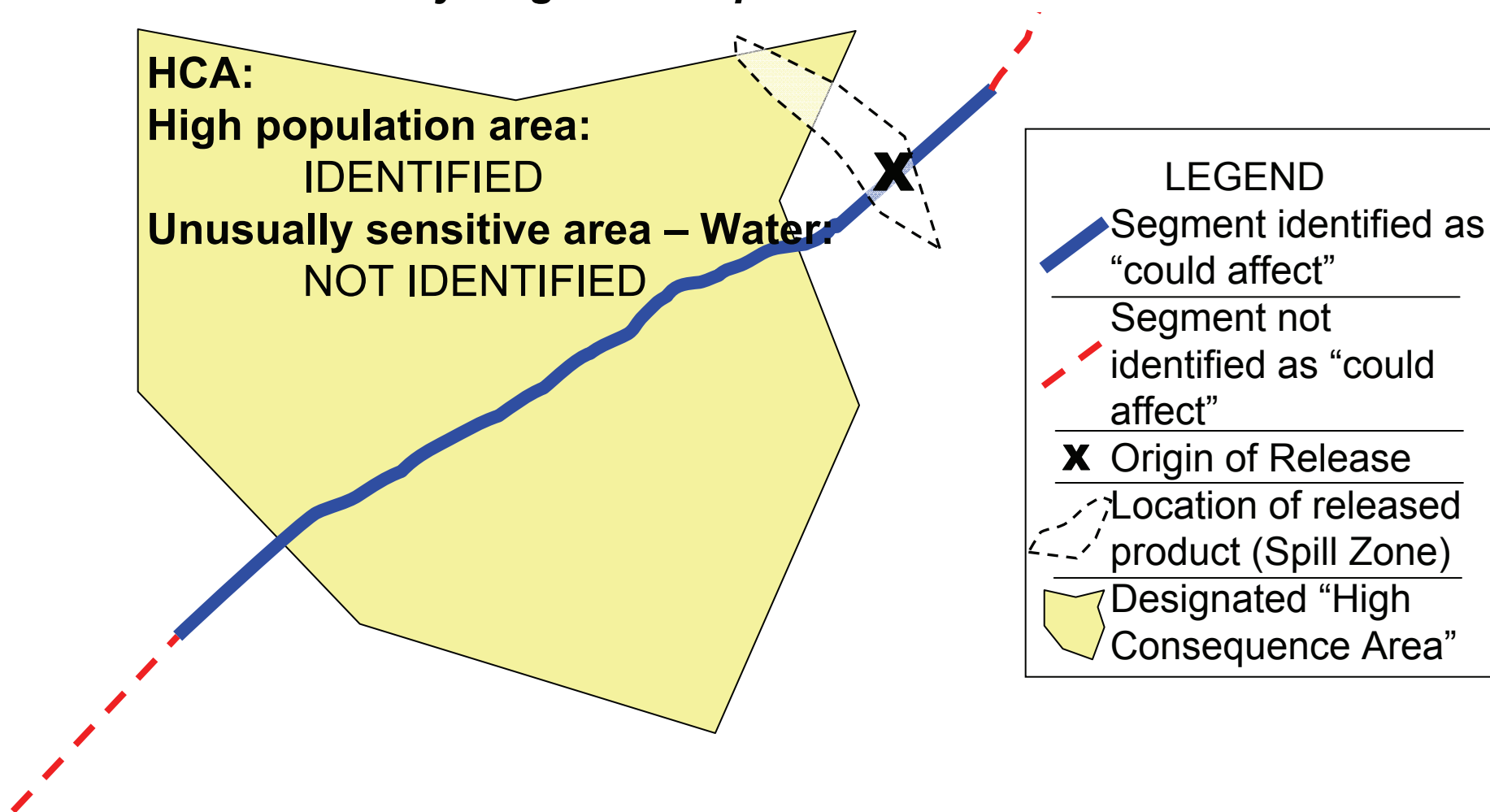
Originate from a facility or pipeline segment identified as one that “could affect” any “high consequence area”? NO

Did this release reach or occur in any “high consequence areas”? NO



Originate from a facility or pipeline segment that had been identified as one that “could affect” any “high consequence area”? YES

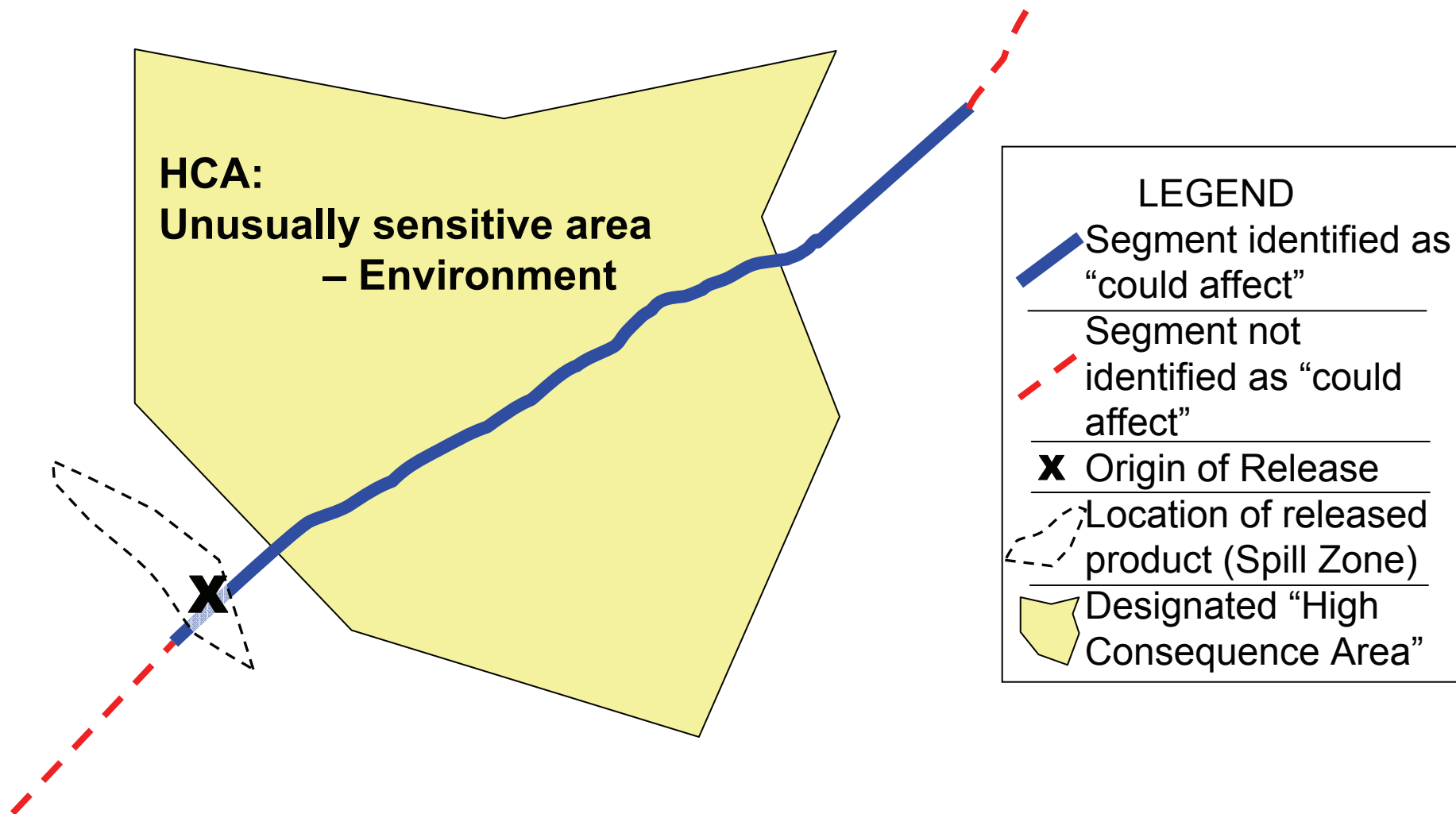
Reach or occur in any “high consequence areas”? YES





Originate from a facility or pipeline segment that had been identified as one that “could affect” any “high consequence area”? YES

Did this release reach or occur in any “high consequence areas”? NO



Capturing IMP Activity

- ✱ **Framers: Capture indicator of industry's efforts and progress: "Look at all these things we're fixing!"**
- ✱ **Senator McCain (and others): "Given the number of repairs that have had to be performed, should the schedule for implementing integrity management be accelerated?"**

The Questions (Shorthand)

- ✱ **Q33: How many anomalies did you dig?**
- ✱ **Q34: How many did you repair?**
- ✱ **Q35-37: How many met the IMP rule's definition for:**
 - **Q35. Immediate Repair Condition**
 - **Q36. 60-day condition**
 - **Q37. 180-day condition**

The Debate over Q 34

☀ Concerns

- Some co's capture only anomalies on the dig list, not "collateral" anomalies repaired/mitigated
- What is "repaired"? "Mitigated"?

☀ # of excavated anomalies v # conditions repaired/mitigated, 33 operators:

- 13 report the same # for both
- 15 report fewer repaired/mitigated than excavated
 - ✓ When DOT data are public, will numbers give the impression that the operator ignored anomalies?
- 5 report more repaired/mitigated than excavated

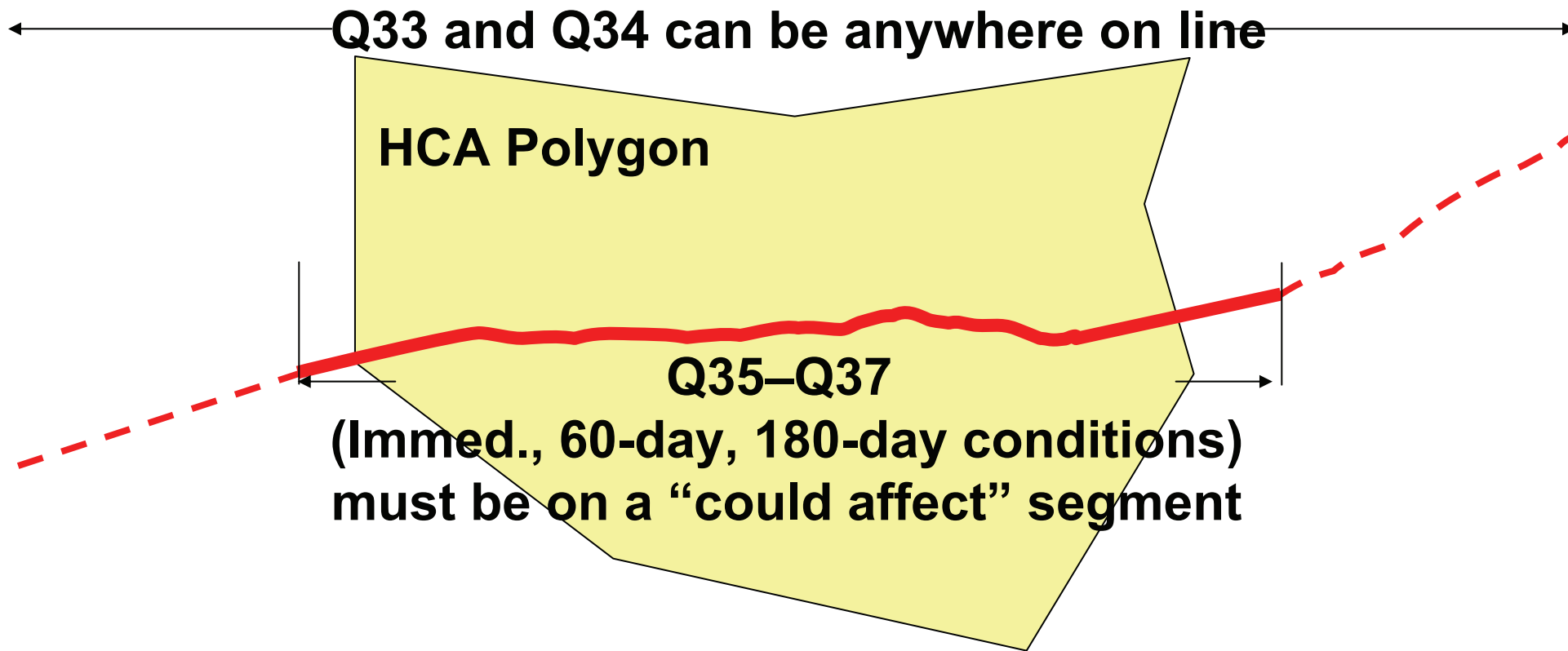
☀ Want same answer, PPTS v OPS Annual Report

The DMT's New, Improved Question

(anomalies)

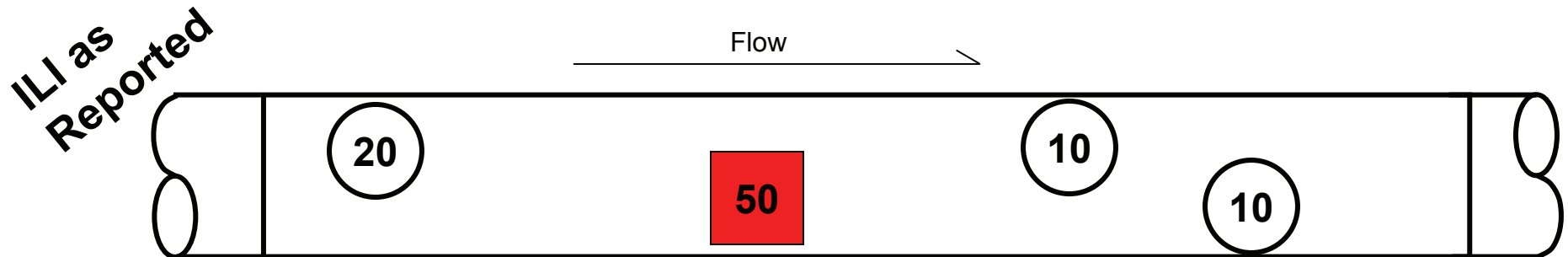
- ✱ Q 34: Total # of ~~conditions~~ identified and repaired ~~or otherwise mitigated~~ in calendar year
- ✱ ~~Help Text: Include conditions identified only as a result of excavating another (different) targeted anomaly, but exclude conditions that did not require repair or mitigation~~
- ✱ DMT has written guidance for PPTS operators on how to answer questions
- ✱ Examples . . .

Q33-34 DO NOT Reference Rule

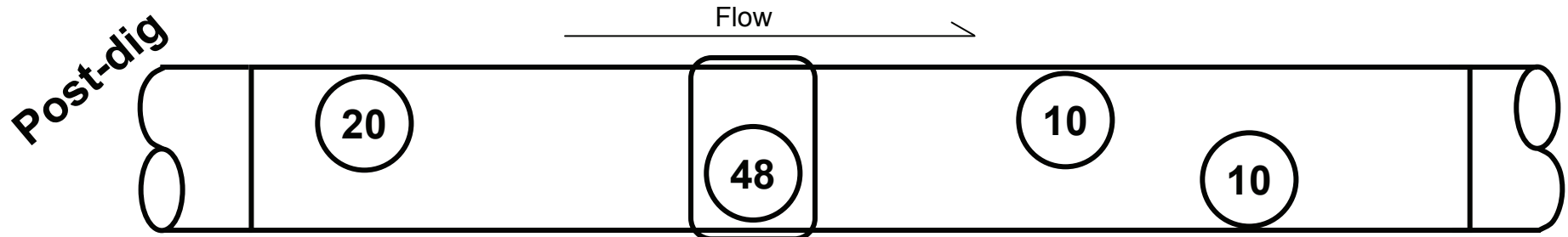


-  Segment identified in IMP Plan as "could affect" an HCA
-  Segment not identified in IMP Plan as "could affect" an HCA

Illustration #1

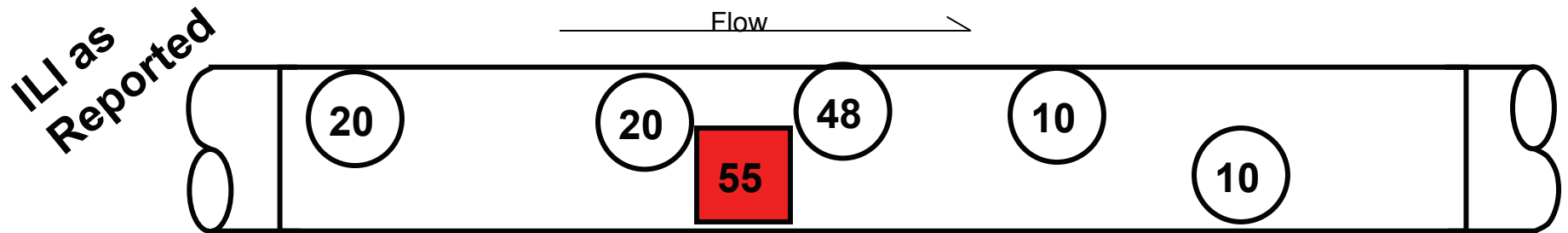


ILI report shows four anomalies; one meets operator's criteria. **Answer to Q33 is 1.**

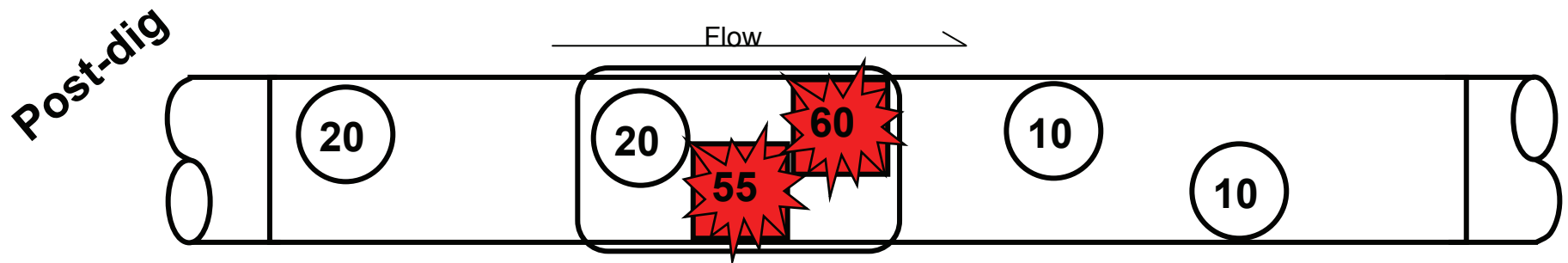


Once dug, the joint shows that the target anomaly does not meet repair criteria of 50%. The dig was difficult, however, so the operator repairs it anyway. **Answer to Q34 is 0.**

Illustration #2

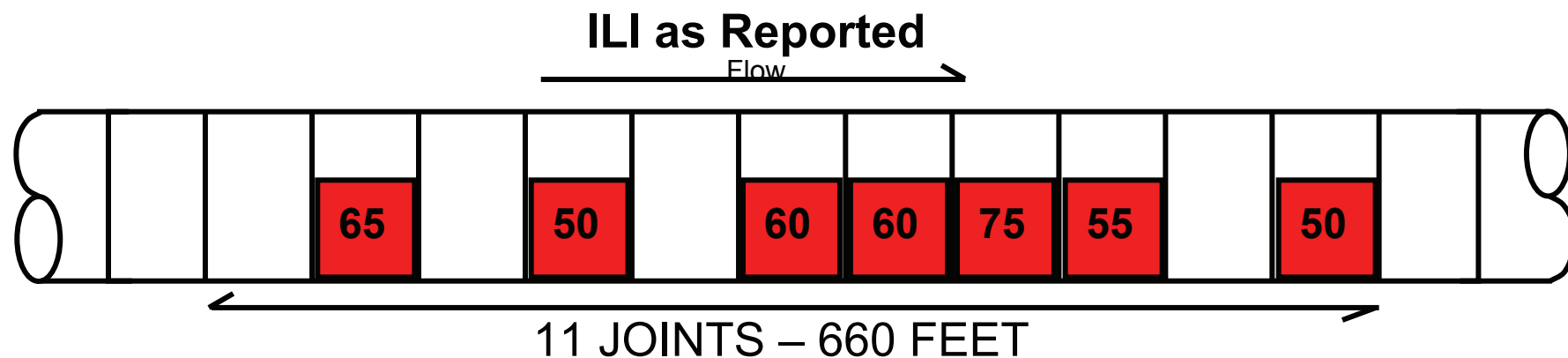


The ILI report shows six anomalies, one meets operator's criteria. **Answer to Q33 is 1.**



The ILI report undercalled one anomaly. The target anomaly (55%), the undercalled anomaly (60%), and an anomaly not meeting criteria (20%) are repaired. **Answer to Q34 is 2.**

Illustration #3



The ILI report shows seven anomalies on 11 joints that meet the operator's criteria. **Answer to Q33 is 7.**

It may be more efficient to replace all 11 segments with one cutout. In this instance, the operator may choose not to evaluate and document each of the actual conditions.

Answer to Q34 is also 7.

Themes for Reporting

- ✱ **FIRST: Can the industry learn from it?**
- ✱ **THEN, CONSISTENCY: How are others reporting it?**
- ✱ **Another clue: Is it reportable to DOT**
 - ➔ **IF YES, REPORT TO PPTS**
 - ➔ **If not, may still be reportable to PPTS**
 - ✓ **Gathering**
 - ✓ **SMYS**
 - ✓ **EPA tanks**
 - ✓ **Etc.**

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 – report if happened while you operated, i.e., 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
- ✱ **An *intentional* Release that occurs during maintenance activity; <5 barrels; contained; does not require clean-up - no**
- ✱ **A Release of <5 gallons but property damage exceeds \$50,000 (only DOT reportable due to \$'s) -yes**

PPTS Coverage #5: Reporting Mileage

- ✱ **How do you report mileage of pipe when you have bought or sold assets during the year?**
 - ➔ **As of December 31**
 - ➔ **As of January 1**
 - ➔ **Prorated for ownership during year**
 - ➔ **Other**
 - ➔ **Do not know**
 - ➔ **Answer: Buyer and Seller Agree**

Additional Guidance

- ✱ **Advisories: www.api.org/ppts; click “documents”**
- ✱ **FAQs: www.api.org/ppts; click “FAQs”**
- ✱ **Hazem: arafa@api.org; 202-682-8506**
- ✱ **Cheryl: ctrench@rcn.com; 212-787-6923**
- ✱ **Will query DMT for add'l guidance if necessary**