

## **Frequently Asked Questions (FAQ)**

### ***Technical***

If you cannot find an answer to your question, contact the API/PPTS staff ([adefemia@api.org](mailto:adefemia@api.org) or [arafa@api.org](mailto:arafa@api.org)) for further assistance.

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## 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. You will need an account. Please contact API/PPTS staff for more information ([adefemia@api.org](mailto:adefemia@api.org) or [arafa@api.org](mailto:arafa@api.org)).

Participants may choose to report incidents as they occur or periodically. Reports should be revised as new information becomes available. The cut-off date 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. [\[Back to top\]](#)

## What kind of material spilled do I report to the 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.

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## 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 4 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. [\[Back to top\]](#)

**I have an operator error accident and am 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"?**

**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."

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. [\[Back to top\]](#)

## **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 ( $\text{CH}_3\text{CH}_2\text{OH}$ ) 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.

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## 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;  
Condensate spills from pipelines regulated under DOT Part 192 but not DOT Part 195;  
Spills of oil that is not transported for hire, such as hydraulic oil.  
Intentional small 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. [\[Back to top\]](#)

## 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 *unintentional* 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 railroad siding. [\[Back to top\]](#)

## 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 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. [\[Back to top\]](#)

## **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. [\[Back to top\]](#)

## **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. [\[Back to top\]](#)

## **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. [\[Back to top\]](#)

## **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. [\[Back to top\]](#)

## **Should I report truck rack spills?**

No. The PPTS does not include truck rack spills of any kind. [\[Back to top\]](#)

## **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 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).

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## **Should I report rail car spills?**

No. The PPTS does not include rail car spills. [\[Back to top\]](#)

## **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 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). [\[Back to top\]](#)

## **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. [\[Back to top\]](#)

## **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, 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.

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### **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. [\[Back to top\]](#)

### **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. [\[Back to top\]](#)

### **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. [\[Back to top\]](#)

### **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.

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### **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. [\[Back to top\]](#)

### **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.

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## Can I print a copy of my incident once I am done entering the data?

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" (just DIRT questions). 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 screenshots below . . .

The screenshot displays the 'American Petroleum Institute Pipeline Systems' web application. The page title is 'American Petroleum Institute Pipeline Systems'. Below the title, there is a section for 'New Survey' with a dropdown menu for 'Survey Type' and a 'Create' button. A table lists release records with the following data:

Tracking Number	System	Type	Created Date	Creator	Last Modified	Status
<input checked="" type="checkbox"/> 200405030000	API	New Release Record	05/03/2004	HA	05/03/2004	Incomplete
Test no spill navigation path						
<input type="checkbox"/> 200407130002	API	New Release Record	07/13/2004	HA	07/13/2004	Incomplete
test no spill nav based on zero release						
						Incomplete

The 'Generate Report' button is highlighted with a red arrow.

API PPTS System - Mozilla Firefox

http://ppts-survey.api.org/prod/index.cfm?fuseaction=Reports.Survey\_Report&SystemID=76

API PPTS System

Logout

Adebukola Adefemi  
adefermia@api.org

Home  
About  
News  
PPTS Admin  
System List  
Survey List

### Generating Report ...

You are about to generate report(s) for selected Survey(s) ....

Survey(s) Info:

Tracking Number	Survey Type	Report name	Report type
200405030000	New Release Record	Complete report for "New Release Record"	PDF

**Note**  
Generating report might take a few minutes.

Create report(s)

email: [ppts@api.org](mailto:ppts@api.org)  
Copyright © 2002 [The American Petroleum Institute](http://www.americanpetroleum.com)

Done

start

Audio CD (D:) Track01.cda

1:49 PM

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## 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 have these critical facts available to you prior to initiating the incident submittal process. Keep in mind that the deadline for PPTS report submittals is the last day of February of the next year following the incident. Some questions are not critical and we provide you with the option of choosing "I don't know". We urge you to come back and fill in these answers at a later date.

If a question does not give you the "I don't know" option, it is a *must*-answer question.

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## What about spills to secondary containment?

A spill captured in secondary containment does not negate the reporting requirement. Once the transported material exists the primary containment (basically the pipe or the pipeline system) it has reached the threshold to be considered a release. 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'll have an opportunity to report that there were no impacts, if this is the case.

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### **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 determine causes for smaller spills.

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### **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 Incident 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.

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 include a release is voluntary. PPTS will include a new 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 below . . .

**API PPTS System - Mozilla Firefox**  
 http://ppts-survey.api.org/prod/index.cfm?fuseaction=Admin.Surveystat&SystemID=76

**API PPTS System**

**American Petroleum Institute Pipeline Systems**

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 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".

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".

**New Survey**

Survey Type: [Select Survey from list and click "Create"]

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

Tracking Number	System	Survey Type	Date	Status
200405030000	API	New Release Record	05/03/2004	Incomplete
Test no spill navigation path				
200407130002	API	New Release Record	07/13/2004	Incomplete

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.

Additional information (User Guide and Mapping) about DIRT reporting is available at this link. Scroll all the way down to the end of the page to access these documents.

<http://committees.api.org/pipeline/ppts/files.html>

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### 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.

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## **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).

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