The oil pipeline industry has undertaken a voluntary environmental performance tracking initiative, recording detailed information about spills and releases, their causes and consequences.

The pipeline members of the American Petroleum Institute and the Association of Oil Pipe Lines believe that tracking and learning from spills will improve performance, thus demonstrating the industry's firm commitment to safety and environmental protection by results.

This is one of a series of fact sheets and industry advisories drawn from the Pipeline Performance Tracking System, "PPTS."

PPTS ADVISORY FOR OPERATORS: BUILDING QUALITY INTO THE NUMBERS

PPTS is the Foundation

PPTS data represents the oil pipeline industry -- numbers, statistics, analyses, fact sheets, advisories. PPTS is becoming one of the foundation elements building towards the goal of error-free and spill-free operations. As a foundation element, all participants need to ensure that their individual contributions – each field, each number – accurately reflect the incidents that occur and the descriptive elements about company systems and the national oil pipeline network. This Advisory suggests good practices for operators to consider in setting up internal company databases and internal company review processes prior to PPTS submittal. This Advisory also suggests good practices in using PPTS data as part of your own company performance tracking.

Good Data Management Practices

- *Communicate within the company the commitment of senior management* for accurate and complete reporting, and resources sufficient to assuring its success.

- *Consider assigning one individual* (with a back up identified) the primary responsibility for reporting accurate and timely information both to PPTS and to the Office of Pipeline Safety.

- *Understand the information required and designate a data source within the company* for each PPTS and OPS data field. Make sure that the data source understands the importance of the input provided.

- *Crosscheck PPTS records and OPS records*. The PPTS website includes a side-by-side comparison of the data fields. Remember that OPS has a time deadline of 30 days for incident reporting; PPTS has only an annual deadline. Thus, there is time to filter revised information before entering it in PPTS. The crosscheck is critical to each operator's public record: recent review of OPS records identified duplicate incidents, implausible commodity classifications, and other clear inaccuracies.

- *Consider technical quality review of all PPTS submittals* prior to the annual PPTS reporting deadline (typically the end of February). A number of PPTS participating companies have instituted such a review, especially for spills of 5 barrels and more. This engineering quality review should include –

  - ➢ Confirmation of consistent and accurate reporting from one incident to another, avoiding different interpretations from one set of field personnel to another

  - ➢ A review of missing data elements (or the entry "unknown") to determine the reason for the omission and whether certain types of requested data are systematically missing. Particular targets for this review should include descriptions of the pipe involved, such as the installation year or the type of pipe. For corrosion incidents,

examples of information requiring review would include whether and how the pipe was coated, and whether a CIS survey had been completed. (These specified elements are only captured for spills of five barrels and more.) PPTS also reviews missing elements to determine if those data fields are correctly described, are not used during analysis, or require other changes.

➢ If incident investigation provides additional or revised data for PPTS and/or OPS, revise the incident report accordingly.

- Company employees who are contributing to or reviewing PPTS data submissions should understand why the oil pipeline industry created PPTS and how the data are being used:

  ➢ To understand the industry's safety and environmental performance in depth;

  ➢ To change employee behaviors and company practices to support the goal of error-free and spill-free operations;

  ➢ To influence industry wide performance to support the goal of error-free and spill-free operations across the oil pipeline industry;

  ➢ To shift the focus from lagging indicators to leading indicators, particularly in understanding the causes and consequences of all spills, with a special emphasis in learning from the small spills (5 gallons to 5 barrels);

  ➢ To provide statistical and analytical support for operator integrity management programs (for example, risk assessment and re-inspection intervals);

  ➢ To provide information and analyses that help the industry work with regulators such as the OPS, state agencies, permitting authorities and local officials.

Good Analytical Practices

- Companies should consider developing a set of performance metrics that are used consistently from year to year to evaluate incident and spill performance.

- Companies should consider using industry-wide performance metrics as part of this periodic review to compare company performance to the oil pipeline industry as a whole or certain "peer" companies. PPTS can assist with peer reviews.

- Measuring company performance against the median for industry-wide or peer group comparison is preferable. Often the industry-wide or peer group average (mean) is driven by one operator or a particular event. With respect to volume in particular, a single large event often contributes to wide swings in performance from year to year. By using the median, companies can better understand where they fall among other operators.

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Future fact sheets will discuss new lessons learned as they are developed.

For further information about PPTS and its lessons, go to http://ppts.api.org/.