

PI-72-0110

Department of Transportation
Federal Railroad Administration
Washington, D.C. 20591

August 10, 1972

To: Parties of Record on Liquid Pipeline Mailing List:

It has been brought to my attention that a number of companies reporting to the Department of Transportation, on Pipeline Carrier Accident Report, Form F 39 (Formerly 7000-1), are basing their reporting on net barrels lost.

Section 195.50 of the Federal liquid pipeline safety regulations states "This subpart prescribes rules governing the reporting of any failure in a pipeline subject to this part in which there is a release of the commodity transported resulting in any of the following:" Paragraph 195.50(b) states "Loss of 50 or more barrels of liquid."

Part G, Item 2 of the accident report form requires an estimate of loss due to the accident.

The Department of Transportation's interpretation of these two requirements is that "loss" of commodity means all commodities released from the pipeline, not just the portion that is not picked up. The amount in both cases should be a gross barrels figure, and not a net barrels figure.

For example; if a company had an accident, and 70 barrels of commodity were released, with 30 barrels picked up and put back into the system, this would be considered a reportable accident in which the reported loss would be 70 barrels.

If you have any questions or comments concerning this interpretation, please contact this office.

Sincerely,
John W. Ingram
Administrator