

AIR POLLUTION CONTROL DISTRICT
REGULATORY COMPLIANCE DIVISION

POLICIES AND PROCEDURES

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Topic: Offshore Compliance Protocol

Distribution: All Policy Holders

This policy and procedure document provides guidance on inspecting offshore petroleum production facilities. Inspections of offshore petroleum production facilities require significant preparation and forethought. Due to the complexity of offshore operations and the remote location of the platforms, the inspector must have a clear understanding of the work to be accomplished in order for the inspection to be completed within a reasonable time frame.

Policy and Procedure I., "Inspection Procedure", will govern the conduct of offshore investigations with the following modifications:

1. **Inspection Frequency (I.A)** – for State Tidelands platforms that are not under District permit but which are providing offsets for permitted facilities and for OCS platforms, the project manager will schedule inspections as needed.
2. **Access to the Facility, Unannounced Inspections (I.B.1)** – the project manager will inform the inspector of the need for any unannounced inspections. Unannounced inspections will generally be limited to those platforms in State Waters which are providing offsets. All unannounced inspections must be approved in advance by the Permit Compliance Section Supervising Engineer.
3. **General Inspection Procedures (I.D)**
 - In addition to visible emissions, an observation of the facility surroundings should be conducted. This observation focuses on odors downwind of the facility and the presence of any oil slicks or pollution on the sea surface in the vicinity of the facility. A detection of odors or surface pollution may indicate an excess of fugitive emissions from process equipment or a malfunction of process or control equipment.
 - District inspectors may sign facility sign-in sheets, logs or visitor registers. In no circumstances shall District employees or support contractors sign waivers or releases that relieve the facility from responsibility for injury or that would limit the rights of the inspector to conduct a thorough inspection of the facility. Waivers for transportation services shall also not be signed. The project manager must inform his/her project contact about this policy well in advance of the

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inspection date. If a District inspector is presented with such a document, he or she is to politely refuse to sign it. If permission to conduct the inspection is contingent upon signing the waiver, the inspector will terminate the inspection.

4. **Inspection Checklist (I.D.5)** - platform inspections depend in great part on the specific permit conditions. Because of the remote location of many offshore facilities and potential difficulties in scheduling inspections, the inspector and the project manager should thoroughly review the permit and prepare a source specific check list. The checklist may need to be modified after the first visit to account for unforeseen circumstances or to delete or incorporate specific items.
5. **General Inspection Procedures, Safety (I.E.1)**
 - Before any APCD staff are approved to conduct offshore inspections or visits, they shall receive all necessary safety training, and such training shall be documented.
 - At least one or two days prior to the inspection, the project manager should check with the offshore operator to ascertain whether the operator has any specific safety requirements such as steel-toed boots. The project manager should also confirm whether the inspection team should bring their own air-packs.
 - Upon arrival on the platform, the platform operator may provide a safety briefing which includes the use of air-packs and escape and evacuation procedures. Inhalation hazards are a particular risk due to the presence of H₂S in the produced oil and gas streams and the limited avenues of escape. Slippery surfaces are an additional hazard as most of the platform is exposed to the weather. Consequently, the inspector should be familiar with the warning systems and must understand and obey all platform safety regulations.
 - It is not advisable to wear contact lenses. Emergency air supplies which are in the "Constant Supply" mode as opposed to the "Supply-On-Demand" mode can cause eye damage when contact lenses are worn.
 - Clothing materials made of nylon and related synthetics may not be brought onto platforms as they may cause static electricity and consequently an explosion.
 - All battery-operated equipment (e.g., organic vapor analyzers, flashlights, cameras) must be rated by Underwriters Laboratory as intrinsically safe, i.e., they have been designed in such a way that they can be used in the potentially hazardous explosive environments which are present on platforms.
 - In some cases it may be necessary to terminate an inspection prior to completion due to safety risks. This situation may occur due to inclement weather conditions, intermittent process leaks, high concentrations of fugitive emissions, or other unforeseen occurrences. If a situation

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presenting a significant health or safety risk occurs, the inspection should be terminated immediately.

If samples of fuel oil are needed, Policy and Procedures Section III, "Sampling Program", will need to be followed.

Transportation to and from platforms via either vessel or helicopter, will be arranged by the project manager. Twenty-four hours or more of advance notice may be required. Because of the potential dependence on platform operator-scheduled transportation services, the inspections must be carefully planned and conducted in such a way that the time available on the platform is efficiently utilized.

The District has contracted with a local helicopter firm to provide transportation in the event operator-scheduled transportation is not available.

The following items may require inspection:

1. Fugitive I&M program (also refer to Policy and Procedure document II.V.1)
 - components tagged
 - "leakers" tagged, repaired and reinspected
 - "delayed" repairs (critical components)
 - logs detailing daily inspection/repair activities
2. Gas Turbinés - see Policy and Procedure II.D
3. Flares - see Policy and Procedure II.E
4. Compressors - see Policy and Procedure II.H
5. Crew and Supply Boats - if a crew or supply boat is at the facility, note the name of the vessel. If the vessel departs prior to the end of the inspection, note the time of departure. Inspection of marine vessels is described in Policy and Procedure II.U. If there are visible emissions when vessels are in State Waters, refer to Policy and Procedure document I.D.1 for further action.
6. Drilling engines, cementing and logging units - if wells are being drilled or worked over, this equipment may be used. If they are powered by IC engines, check the logs for the number of hours they are used.
7. Cranes, emergency generator(s) and fire water pump(s) - check logs for the number of hours used and fuel characteristics.
8. Process heater(s)
 - fuel use (scf/hr)

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