

**U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF OCEAN ENERGY MANAGEMENT,
REGULATION AND ENFORCEMENT
PACIFIC OCS REGION**

**OFFSHORE INSPECTION PROGRAM
POLICIES AND PROCEDURES DOCUMENT
(P&PD)**

Approved:

/s/ EGA

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Date

Management, Regulation and Enforcement (BOEMRE) earlier this year. The name change was made effective by Order No. 3302, signed by the Secretary of the Interior on June 18, 2010. Pursuant to the Secretarial Order, BOEMRE exercises all authorities previously vested in the MMS. As provided for under the Secretarial Order, BOEMRE will be promulgating a rule in the Federal Register changing all references of the MMS to BOEMRE in the Department of the Interior's regulations. All references to MMS in this P&PD have already been changed to BOEMRE, including Memorandums of Understanding, Memorandums of Agreement, and a Letter of Agreement that predated the name change.

On May 19, 2010, the Secretary of the Interior signed Order No. 3299, calling for the establishment of the Bureau of Ocean Energy Management, the Bureau of Safety and Environmental Enforcement, and the Office of Natural Resources Revenue. On October 1, 2010, the Minerals Revenue Management (MRM) program within BOEMRE became the Office of Natural Resources Revenue (ONRR) under the Assistant Secretary for Policy, Management and Budget. This was the first important step of a series of steps that will fully implement the reorganization of BOEMRE. The references in this P&PD to MRM with regard to oversight of production measurement have been changed to ONRR. As the reorganization progresses and further changes are made to the organizational structures, there may be associated changes to the offshore inspection program and therefore this P&PD.

PACIFIC OCS REGION POLICIES AND PROCEDURES DOCUMENT (P&PD)

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PACIFIC OCS REGION POLICIES AND PROCEDURES DOCUMENT (P&PD)

CHAPTER 1. P&PD DEVELOPMENT

1. Purpose: This document covers policies, procedures, and responsibilities for various functions of the POCSR's Offshore Inspection Program. Specific functions covered are:
 - A. Inspection Planning and Procedures
 - B. Incidents of Noncompliance
 - C. Civil or Criminal Penalties
 - D. Inspection Data Base
 - E. Inspector Training and Certification
 - F. Personal Protective Equipment
 - G. Internal Review
 - H. Oil Spill Response and Pollution Prevention Inspections, Drills, and Training
 - I. Accident/Incident Investigation, Reporting, Enforcement Actions, and Training
2. Objectives: This chapter establishes procedures for developing, reviewing, and distributing the POCSR Offshore Inspection Program Policies and Procedures Document.
3. Authority: The authority for developing the Document is contained in BOEMRE Manual 650.1, Offshore Inspection Program, and BOEMRE Manual 381.1-H, Preparing and Processing Directives.
4. National Policies and Procedures Document: The National Policies and Procedures document provides the overall structure for the BOEMRE Offshore Inspection Program. While the Regions adhere to these policies and, in general, these procedures, each Region is unique in many important ways. As a result of the unique characteristics (geographic considerations and complexity of operations) of each Region and District, these entities implement the national policies in different ways. Details on Region-specific inspection policies and procedures are contained in Regional Policies and Procedures documents.

5. Regional Policies and Procedures Document (P&PD): This document is the Regional Director's delegation of responsibility for the Offshore Inspection Program. A copy is provided to the Associate Director for Offshore Energy and Minerals Management (AD/OEMM) for information purposes. (Per the BOEMRE Manual, one of the AD/OEMM's oversight responsibilities includes ensuring "consistency among regional programs, while taking into account Region-specific circumstances.") The revised document is made available on the POCSR's LAN, and a copy is provided to the Chief, Office of Offshore Regulatory Programs, Attention: Chief, Safety and Enforcement Branch.

The procedures in the P&PD describe the responsibilities for various inspections by POCSR staff.

6. Changes to P&PD: The P&PD is a living document that is updated to reflect improvements and refinements to POCSR's offshore inspection and related oversight activities.

PACIFIC OCS REGION POLICIES AND PROCEDURES DOCUMENT

CHAPTER 2. INSPECTION PLANNING AND PROCEDURES

1. Purpose: This chapter defines responsibilities and procedures related to planning of inspections by POCSR personnel in accordance with existing laws, regulations, and BOEMRE policies.
2. Responsibilities and Procedures:
 - A. Developing of Potential Incidents of Noncompliance (PINC) Lists and Project-Specific Inspection Criteria: The Office of Field Operations (OFO) has two representatives on the National PINC Team: the California District (CD) Supervisory Inspector (SI) and the Operations, Safety, and Enforcement Section (OSES) designated Petroleum Engineer. The SI identifies the Field PINC's to be used for inspections in the POCSR. The OSES designee coordinates the Office PINC's. The current PINC List is posted on the BOEMRE Website (at www.boemre.gov/regcompliance/inspect.htm) and is continually updated.
 - B. Scheduling of Inspections:

Inspections will be scheduled by the SI so that the assignment of personnel will result in a high level of productivity, efficient helicopter use, and an effective inspection program.

To ensure that all inspection frequencies and content requirements are met, the following factors will be considered by the SI in determining inspection schedules:

 - (1) Date and type of last inspection
 - (2) Results of previous inspections
 - (3) Present activity at the facility including proposed change of operator
 - (4) Special regional or national directives
 - C. Conduct of Inspections:

Inspections will be conducted mainly by District personnel. In addition to the Inspectors, District engineers will be onsite on a regular basis, providing a more comprehensive oversight of the offshore operations. OSES personnel will take part in certain onsite inspection activities (such as spill drills, Focused Facility Reviews, pipeline leak detection system inspections, and accompanying the Gulf of Mexico OCS Region's Office of Structural & Technical Support structural

engineer during POCSR platform inspection visits) and in other oversight activities, such as review of pipeline survey findings. District Environmental Liaison(s) designated by the Office of Leasing and Environment (OLE) may also conduct inspections which have an environmental component(s). Meter provings may be witnessed by Office of Production, Development and Resource Evaluation (OPDRE) personnel, who also review production figures.

Announced or unannounced inspections will be conducted as either complete or partial inspections.

Complete inspections will involve a five-step process:

- (1) Review operator records to verify completion of all required operator performed inspections, tests, and training since the last complete BOEMRE inspection.
- (2) Visually inspect all safety and pollution prevention devices.
- (3) Test or demonstrate the operation of critical safety and pollution prevention devices to ensure that they are properly installed and operable. Witness critical pressure and/or operational tests.
- (4) Inspect for operations safety throughout the facility, looking for unsafe conditions, spills, leaks, and environmental effects.
- (5) Take photographs of (i) the corroded areas and equipment/materials not being used and allowed to rust/deteriorate, and of (ii) the outside of the platforms. All these photographs will be reviewed by the SI, DM and appropriate District/Regional engineers to determine if any follow-up actions are required.

Partial inspections will follow the same process as complete inspections except that the inspection personnel will review a sample of operator records, visually inspect a portion of safety and pollution devices and witness and/or test the operation of randomly selected critical safety and pollution prevention devices. A visual inspection of the facility for potential safety and environmental problems (e.g., leaking equipment) will be conducted.

D. Activities for Inspection and Other Oversight

- (1) Focused Facility Review (FFR) [*TIMS code: FFR*]: FFR's will cover all aspects of platform operations and management from a systemic perspective, concentrating on areas such as facility condition, safety systems, environmental aspects, documents, training, hazardous materials,

electrical systems, and policies/performance. The FFR complements annual and partial inspections. FFR teams consist of CD, OSES, and OLE staff and representatives of the U.S. Coast Guard. FFR's will be conducted on at least three POCSR platforms a year, with facility selection based on operator performance (accidents, INC's, etc.), operational changes, and other related factors. The teams will prepare FFR Reports containing findings from each FFR and identifying required and suggested follow-up actions for the facility operators and participating offices. Operators are provided with FFR findings, including items that require corrective action. The FFR program, given its systemic nature, is intended to go beyond standard inspections and issuance of INC's, but INC's can still be issued if identified corrective actions are not resolved. Referrals to other agencies can also be made.

- (2) Drilling Inspections: Complete (announced or unannounced) drilling inspections [*TIMS code: DR*] will be conducted on each drilling rig at least once per quarter by the inspection personnel. These inspections will include all applicable general, drilling, pollution, and hydrogen sulfide PINC's from the National List.

Partial (unannounced) drilling inspections [*TIMS code: DP*] will be conducted on each drilling rig at least once per month by the inspection personnel, unless it is determined, based on consecutive inspections, that minimal changes are occurring in the operations (rig, location, etc.), in which case subsequent drilling inspections may be conducted at least once per quarter. Partial (unannounced) drilling inspections will include those PINC's for which the SI has determined that compliance will be most likely to deviate between complete inspections, with special attention given to PINC's related to well control and procedures that have proven troublesome at the facility. These inspections will include at least 25% of the applicable PINC's.

Pre-drill inspections will be conducted on all rigs on arrival or re-arrival prior to their first spud in the Region. These inspections will include all applicable PINC's that cover the suitability of the drilling unit for the environmental conditions at the site, hydrogen sulfide equipment, adequacy of deck drainage systems, rig identification, oil spill response equipment, mud monitoring equipment, gas detectors and sensors, blowout preventer equipment, storage capabilities, well control training, drilling equipment, and other pertinent items.

- (3) Production Inspection: Complete (announced) production inspections [*TIMS code: PC*] will be conducted on each production facility annually by the inspection personnel. These inspections will include 100% of the

applicable production, general, pollution, and hydrogen sulfide PINC's from the National list. The Production Engineer and SI, utilizing the facility Safety Analysis Function Evaluation (SAFE) charts, National PINC List, lease stipulations, and conditions of approval, will develop a process component list unique to each facility for use during the required pre-production inspection and subsequent annual inspections. To increase inspection efficiency, the Inspectors will stay overnight at larger platforms during annual production inspections, when feasible.

Partial (unannounced) production inspections [*TIMS code: PP*] will be conducted on each facility at least 6 times annually by the inspection personnel. These inspections will include those PINC's for which the SI has determined that compliance will most likely deviate between complete inspections, with special attention given to devices and procedures that have proven troublesome at the facility or other facilities in the Region. These inspections will include at least 25% of the applicable PINC's.

(4) Well Completion Inspections [*TIMS code: DP for primary; CO for secondary inspection*]:

- (a) Complete well completion inspections will be conducted on each unit conducting completion operations at least once per month by the Inspectors(s) using all applicable PINC's, unless the District Manager determines that an alternative inspection frequency would be more appropriate for completion operations at a particular facility. Well completion inspections will be conducted with partial production inspections, where possible.
- (b) Pre-completion inspections will be conducted on all well completion rigs by inspection personnel when the unit is used for the first time in the District, has not operated previously in an H₂S prone area, or the DM determines a pre-completion inspection is needed.

(5) Workover Inspections [*TIMS code: WO*]:

- (a) Complete workover inspections will be conducted on each workover rig at least once a month by the inspection personnel using all applicable PINC's, unless the DM determines that an alternative inspection frequency would be more appropriate for workover operations at a particular facility. Workover inspections will be conducted with partial production inspections where possible.
- (b) Pre-workover inspections will be conducted on all workover rigs

by the inspection personnel when the workover rig is used for the first time in the District, the unit has not operated previously in an H₂S prone area, or the DM determines a pre-workover inspection is necessary.

(6) Pipeline Inspections [TIMS code: PL]:

- (a) Complete (announced) pipeline inspections will be conducted on each pipeline in conjunction with the associated annual, complete facility inspection by the inspection personnel and will cover 100% of the pipeline PINC's.
- (b) Partial (unannounced) pipeline inspections will be conducted on each pipeline in conjunction with the associated facility partial inspection by the inspection personnel and will cover 25% of the pipeline PINC's per inspection.
- (c) Special pipeline inspections for lay barge operations, hydrostatic testing, leaks, damage, repair, etc. will be assigned by the DM as necessary.

(7) Production Measurement [TIMS code: MT (metering)], Site-Security [TIMS code: SS], and Gas Flaring [TIMS code: FL] Inspections:

- (a) Production measurement, oil:
 - (i) At least 10% of all sales meter provings at each sales site will be witnessed annually.
 - (ii) If schedule permits, meter proving at some offshore platforms will be conducted in conjunction with partial production inspections.
 - (iii) Each individual meter proving will be counted as a separate inspection for reporting purposes. Where possible, witnessing/inspection of more than one meter proving in a day will be scheduled.
 - (iv) If inspection personnel notice a possible problem with measurement equipment (an INC may or may not be issued depending on the circumstances), the District Manager will contact OPDRE to confirm if a problem actually exists. In turn, OPDRE will contact the District Manager if discrepancies exist between the operator-submitted oil volume statements and the Oil and Gas Operations Reports

(Form BOEMRE-4054) that require the District Manager and SI to schedule a priority oil meter inspection to verify any inconsistencies.

- (v) District inspectors and, when needed, OPDRE personnel will witness the sales meter provings. District engineers may also assist in witnessing the sales meter provings.
- (vi) Pursuant to a February 5, 2009, internal Memorandum from the Associate Director, OEMM, stating policy regarding *Site Security and Inspections of Measurement Locations*, the District will record oil meter and tank inspection and witnessing activities in the TIMS Report entitled, "Complex/Sampling Inspection Form."

(b) Production measurement, gas:

- (i) At least 10% of all sales meter calibrations at each sales site will be witnessed annually. Witnessing should occur in the same month for which the gas sales data are verified. Sampling methods for witnessing gas meter calibrations will include meter sites with high and low production volumes, with emphasis on those meters that register the largest volumes.
- (ii) If schedule permits, sales meter calibration at some offshore platforms will be conducted in conjunction with partial production inspections.
- (iii) Each individual meter calibration will be counted as a separate inspection for reporting purposes.
- (iv) If inspection personnel notice a possible problem with measurement equipment (an INC may or may not be issued depending on the circumstances), the District Manager will contact OPDRE to confirm if a problem actually exists. In turn, OPDRE will contact the District Manager if discrepancies exist between the operator-submitted gas volume statements and Oil and Gas Operations Reports (Form BOEMRE-4054) that require the District Manager and SI to schedule a priority gas meter inspection to verify any inconsistencies.
- (v) District inspectors and, when needed, OPDRE personnel will witness the sales meter calibrations. District engineers

may also assist in witnessing the sales meter calibrations.

- (vi) Pursuant to a February 5, 2009, internal Memorandum from the Associate Director, OEMM, stating policy regarding *Site Security and Inspections of Measurement Locations*, the District will record gas meter inspection and witnessing activities in the TIMS Report entitled, "Complex/Sampling Inspection Form."
- (c) Complete site-security inspections will be conducted on each royalty measurement site in conjunction with calibration or meter proving witnessing. These inspections will cover 100% of the applicable PINC's. For reporting purposes, one site-security inspection will be counted for each facility regardless of the number of meters located at the site.
- (d) Site-security inspections will be conducted in accordance with the June 2, 2009, Memorandum from the Associate Director, OEMM, Subject: *Policy Regarding Site-Security Inspections of Measurement Locations and the Witnessing of Royalty Meter Proving and/or Calibrations*.
- (e) Gas Flaring: Inspections will be conducted by the inspection personnel to ensure operator adherence to gas flaring regulations at 30 CFR 250.1105, and any conditions of flaring approval. The inspections will cover all applicable PINC's and are included as secondary inspections during complete and partial production inspections.
- (8) Abandonment, Decommissioning, and Site Clearance [TIMS code: AB]: Inspections will be conducted for abandonment, decommissioning, and site clearance operations. These inspections will include all applicable PINC's and project-specific inspection criteria.
- (9) Environmental Inspections [TIMS code = EN]:
 - (a) Complete or partial pollution prevention inspections will be conducted in conjunction with complete or partial drilling, production, and other inspections.

Inspections will cover 100% of applicable PINC's.

Unannounced pollution prevention inspections will be conducted at all offshore development/production facilities quarterly by the inspection personnel or other professional staff. In addition, an

unannounced pollution prevention inspection will be conducted in conjunction with the annual oil spill equipment deployment drill. Also, an announced pollution prevention inspection will be included in the annual inspection conducted on each platform.

Successful BOEMRE unannounced drills can satisfy the requirement for one of the operators' initial or subsequent biannual spill drills.

Additional details on oil spill response inspections, drills and training are included in Chapter 9 of this document.

- (b) Project and Environmental Compliance Inspections:
 - (i) Current General PINC's G-114, -115, and -116 cover operator compliance with lease stipulations, approved applications, and approved plans. As necessary (e.g., prior to commencement of facility construction or decommissioning projects or significant phases of such projects), project-specific inspection criteria will be developed by the project-specific Compliance Team made up of representatives from CD, OSES, and OLE. The criteria will follow the National PINC Guidelines format (PINC, inspection procedure, and noncompliance/enforcement action specifics). These criteria will cover areas requiring special attention including various lease stipulations, plan/application provisions, and conditions of plan or application approval. Upon completion of the project/phase, the inspection criteria will be evaluated by the project-specific Compliance Team in conjunction with the evaluation of conditions of approval to determine effectiveness; the findings will be used to improve inspection criteria.
 - (ii) Special environmental inspections will be conducted by POCSR personnel to determine project compliance during pipelaying, power cable laying, facility construction, facility decommissioning, and other seabed disturbance activities to verify that important sea floor features are not being unduly impacted. Assignments for each inspection are made by the DM on a case-by-case basis, in consultation with the Chief, OSES (C/OSES), Regional Supervisor, OFO (RS/OFO) and Regional Supervisor, OLE (RS/OLE).

- (iii) Other special/environmental inspections related to marine mammals, fisheries and wildlife concerns, and related environmental concerns will be conducted by POCSR staff. Assignments for each inspection are made by the DM on a case-by-case basis, in consultation with the RS/OFO, RS/OLE and C/OSES.
- (10) General: All of the above inspections will also cover applicable general PINC's including those concerning lease stipulations, approved applications, and approved plans.
- (11) United States Coast Guard/BOEMRE MOU Inspections [TIMS code: SG]:

BOEMRE is authorized to perform inspections on behalf of the U.S. Coast Guard (in the U.S. Department of Homeland Security) on fixed OCS facilities and enforce USCG regulations applicable to those facilities, as detailed in a Final Rule published in the Federal Register on February 7, 2002. The rule took effect on June 7, 2002.

To address the USCG-regulated items, BOEMRE in conjunction with the USCG developed new PINC's. The "Z" (Personal Safety) PINC's are used to document any violations found during verification of self-inspections of USCG-regulated items documented through USCG Form CG-5432. They are intended to replace G-110 (conduct operations in a safe and workmanlike manner), G-111 (maintain all equipment in a safe condition), and G-112 (provide for the safety of all personnel and correct/remove health, safety, or fire hazards) when appropriate, given the specificity of each of the "Z" PINC's. Where unsafe operations exist that are not covered by a "Z" PINC, however, issuance of a G-110, G-111, or G-112 will be warranted. BOEMRE has also prepared a "Fixed Platform Self-Inspection Program Reference Manual" covering this topic.

The California District will review CG-5432's, conduct spot inspections, document and track activities in the TIMS database, and document and verify correction of discrepancies; BOEMRE Headquarters (Office of Offshore Regulatory Programs, Safety and Enforcement Branch) provides quarterly and annual reports to the USCG for all the Regions. The USCG safety program had been largely a self-inspection program; review of the facilities and operations by BOEMRE during inspections is expected to increase compliance in critical safety areas.

Where possible, these inspections will be conducted in conjunction with annual and partial production inspections, for efficiency.

BOEMRE and the USCG signed a Memorandum of Understanding

(MOU) on September 30, 2004. As stated in the MOU, Section B. Scope, the document "...covers joint or overlapping jurisdictions related to OCS facilities and OCS activities. This MOU shall also guide the participating agencies in promoting a joint response to future issues associated with alternative energy projects and multiple uses of offshore facilities. In addition, the participating agencies will work together to address issues raised by the regulation of deepwater ports. As discussed in Section J, Memoranda of Agreement (MOA's) developed under this MOU provide specific guidance on each agency's role and shared responsibilities for these OCS activities and OCS facilities."

MOA's have been developed for agency responsibilities (2004), civil penalties (2006), oil discharge planning, preparedness and response (2007), floating offshore facilities (2008), and incident investigation (2009). All BOEMRE MOU's and MOA's are available at <http://www.BOEMRE.gov/MOU/MOUindex.htm>.

(12) Other inspections and related oversight activities:

(a) Construction/Installation and Periodic Inspection and Maintenance to Ensure Structural Integrity:

Inspection of construction and installation of OCS facilities will be performed by the inspection personnel or other professional staff as necessary to keep abreast of progress of the operation, evaluate safety concerns, and become familiar with the systems being installed. Communications will be maintained among the POCSR program offices and the Office of Structural and Technical Support (OSTS) in the Gulf of Mexico OCS Region to facilitate appropriate response to project changes that occur in the field.

OSSES personnel will coordinate review and approval of platforms or other structures with the OSTTS (Platform Verification Program) including the design, fabrication, installation, and modifications of these platforms or structures.

OSSES staff will also coordinate review of the annual reports for platform topsides and jackets in regard to the operator's periodic inspection and maintenance programs:

Regulations at 30 CFR 250.919(a) require lessees/operators to develop a comprehensive annual in-service inspection plan covering all their platforms. 250.919(b) requires them to submit a report on November 1 that includes a list of the platforms inspected and the extent and area of the inspection and type of

inspection employed and a summary of the testing results indicating any repairs that were needed and the overall structural condition of the platform.

OSSES will assemble these annual platform jacket inspection reports and solicit any recommendations from OSTTS and the District office, as appropriate, to ensure maintenance of the platform structural integrity. Reports are reviewed for any indicated damage, excessive marine growth build-up or other potential problems, including cathodic protection system problems. OSSES will also review the submittals to ensure that the appropriate Levels of the inspections have been completed: i.e., Level I topside (every year), Level II underwater (every 5 years, generally), Level III underwater (every 10 years, generally), and Level IV underwater (as appropriate). OSSES will work with the lessees/operators year around over these issues and to initiate corrective actions/repairs if needed. API RP 2A-WSD is the main standard used.

(b) Additional Pipeline Oversight:

OSSES personnel will coordinate evaluation and approval of operator applications for design, installation, abandonment, maintenance, change of service, inspection, and repair of OCS pipelines, including issuance of right-of-way and inspection waivers. OSSES personnel will also oversee and coordinate installation, witness operator inspections, review operator inspection procedures, confirm compatibility with commercial fishing, and assess suitability of leak detection systems. OSSES will coordinate these activities with other program offices, as appropriate.

OSSES personnel are responsible, in conjunction with OLE, for reviewing and recommending approval or other disposition of new or modified pipeline right-of-way grants and ensuring that applicable regulations are met that consider the potential effect of the associated pipeline on the human, marine, and coastal environment, property, and mineral resources in the entire area during construction and operational phases. OSSES personnel will coordinate and consult with the U.S. Department of Transportation, State and local governments, and the Federal Energy Regulatory Commission to aid in the evaluation and determination of granting a pipeline right-of-way.

Leak Detection: OSSES personnel will review pipeline leak

detection plans and recommend approval or other disposition, review the type and the sensitivity of the system, and periodically coordinate with the District to have pipeline operators test pipeline leak detection systems for compliance with regulations and approved plans.

Internal Pipeline Monitoring: To determine the internal condition of pipelines, OSES personnel will review intelligent pig results and other relevant data that operators are required to submit, as applicable. If any internal pipeline conditions are found that need further analysis or remediation (e.g., significant dents or corrosion, etc.), the RS/OFO will require the operator to submit additional information or a remediation/repair plan. OSES personnel will review, in coordination with CD and OLE, as appropriate, all remediation and repairs.

External Pipeline Monitoring: To determine the external condition of pipelines, OSES personnel will review the results of external pipeline surveys that pipeline operators are required to conduct. Surveys need to cover cathodic protection systems, all exposed pipeline segments (including risers and associated clamps), and both sides of spanned pipeline segments. (Pipelines entering State waters must be surveyed to the inshore limit of safe vessel operation.) If any external pipeline conditions are found that need further analysis or remediation (e.g., damage to coatings, significant spanning, etc.), the RS/OFO will require the operator to submit additional information or a remediation/repair plan. OSES will review (in coordination with CD and OLE, as appropriate) and the RS/OFO will approve all remediation and repairs. OSES will also review any damage caused by a third party or debris to determine if remediation/repair is needed.

(c) Seismic Assessment:

OSSES will coordinate with the OSTTS the Region's program requirements for seismic assessment of existing oil and gas structures including assessment initiators, exposure categories, platform information necessary for assessment, the assessment process, criteria/loads, and ultimate strength level analysis requirements and mitigations.

(d) Additional Oversight of Production Measurement

OPDRE will:

Direct the liquid and gas production verification programs for the Region and be responsible for coordination with the DOI Office of Policy, Management and Budget's Office of Natural Resources Revenue (ONRR), on sales and production reporting.

Be responsible for the interface and exchange of Production Accounting and Auditing System-TIMS well information and production data with ONRR, including verification of production and well data. Disseminate the information throughout the Region and provide information to the public in response to requests.

Verify and monitor the reporting of gas disposition for the Region under the Gas Verification System (GVS). Verify and monitor the reporting of oil disposition for the Region under the Liquid Verification System (LVS).

Evaluate and make recommendations for approval of surface commingling applications, production measurement requests, and allocation methods for all gas and liquid hydrocarbons produced from OCS leases to ensure proper allocation of production and royalties to the appropriate OCS leases and/or units.

Work cooperatively with OFO on issues of OCS development and production, production and allocation measurement methods, and surface commingling.

Maintain a current, full listing in TIMS of those meters which have a direct impact on royalty and allocation volumes. A TIMS report listing active meters in the POCSR is accessed through TIMS under **Meters – Reports – MTMTKLOC** and is available for reference by the CD. If an operator makes any relevant meter changes in the future, the changes will be incorporated by OPDRE as soon as practicable in the TIMS **MTMTKLOC** report, and OPDRE will provide an updated copy to the CD.

(e) Air Quality:

The BOEMRE's coordination with the U. S. Environmental Protection Agency (EPA) and the delegated local air pollution control agencies involves: (1) consultation on all operator-submitted air emission control technology exemption requests regarding safety and technical feasibility concerns, and (2) consultation prior to a local air pollution control agency conducting any air quality-related facility inspections. CD

performs the technical reviews and will coordinate with OLE. CD continues to review any proposed facility modifications related to control technologies to ensure that the modifications are both safe and technically feasible, under BOEMRE operating regulations, and conducts inspections of the modifications during the actual construction or installation, as described in (a) above.

(f) Cooperation with EPA on Water Quality [TIMS code: EPA]:

Pursuant to an MOA (dated 1989) with EPA, OLE and District personnel will inspect facility compliance with National Pollutant Discharge Elimination System (NPDES) permits. These inspections consist of records checks, compliance sampling according to the EPA/BOEMRE agreed-upon Annual Workplan, visual inspections of water treatment systems on the offshore facilities, and visual inspections of the sea surface for discharge-related pollution. Records of inspections will be provided to the EPA. The BOEMRE will not take enforcement action for an apparent violation of an NPDES permit that does not violate BOEMRE rules, but will notify EPA.

(g) Cooperation with Nuclear Regulatory Commission (NRC):

BOEMRE POCSR and the NRC signed a Letter of Agreement, dated July 30, 2003, that identifies the areas of cooperation between BOEMRE and the NRC to facilitate NRC inspection of the safe use of radioactive materials on offshore facilities and laybarges; these may include tools used in radiographic analyses of structures and pipelines, well logging, and nuclear gauging devices. NRC licenses use of radioactive materials/tools.

NRC provided training to BOEMRE POCSR personnel on July 30, 2003, to enable BOEMRE to identify irregularities in licensees' activities and notify NRC of the situation. Training for new BOEMRE inspectors was held in March 2008 during the National Inspector Meeting in Lafayette, Louisiana. BOEMRE will provide helicopter transportation for NRC to conduct unannounced inspections of its licensees performing licensed activities. The inspections have occurred about once a year since 2003.

(h) Annual Performance Review Meetings:

In accordance with NTL No. 2008-N02 and the Interim Policy Document No. 08-20, OEMM Annual Operator Performance Review, dated September 12, 2008, the District will hold Annual

Performance Review Meetings with operators to discuss:

- (i) Operator safety and compliance history
- (ii) Events, accidents, and civil penalty referrals/assessments
- (iii) Level, type, and management of operations
- (iv) Any organizational information or changes that may have affected compliance or performance during the preceding year
- (v) A company's success in incorporating the prior year's goals
- (vi) Establishment of new goals for the upcoming year
- (vii) Any special topics/situations unique to the operator
- (viii) OCS-wide issues.

In addition to the Annual Performance Review Meetings, the District will also hold meetings with operators when needed due to changes in any of the above or other areas.

- (i) Operator Well Control and Production Safety Training (30 CFR 250 Subpart O):

OSes and CD personnel will assess facility operators' well control and production safety training plan implementation during audits at the companies' offices. (BOEMRE performance goals call for at least 20% of facility operators to be audited annually; in the POCSR, the auditing of two facility operators meets this target. Additional audits may be triggered if training deficiencies are determined to be the cause of any accidents.) CD personnel will also conduct employee or contract personnel interviews. In addition to POCSR personnel, BOEMRE Headquarters personnel may be involved in the audits, any employee or contract personnel testing, and any hands-on production safety, simulator, or live well testing.

E. Reviewing and Recording Inspection Actions and Reports:

Actions and Reports:

The DM, SI, Drilling Engineer, Production Engineer, OSes personnel, and OLE representative will meet annually or more frequently to evaluate inspection procedures and results. The inspection staff will make recommendations for improving the program based on their daily experience. Procedures for improving helicopter safety and efficiency, increasing the effectiveness of inspections, and improving industry cooperation are sought.

All inspections will be documented by the inspection personnel on an approved inspection form that reflects the National PINC List and site-specific considerations.

When performing an inspection using an inspection PINC list form, the Inspector will checkmark only those PINC's verified by one of the following methods:

- (1) Visual Inspection: Seeing a required item in place that appears to be in good working order.
- (2) Records Inspection: Verifying from field records that a particular device had been tested as required.
- (3) Physical Inspection: Witnessing a device being tested.

A check mark in the "Yes" column means compliance, verified by one of the above inspection methods. A check mark in the "No" column means noncompliance, verified by one of the above inspection methods; an INC must be issued. A check mark in the "NA" column means that an inspection method verified that the specified equipment/operation is not applicable to the inspection being conducted.

When a PINC on the form is not inspected or when time constraints force an Inspector to curtail an inspection prior to completion, a zero (0) will be entered in the "CK" column, signifying that the particular PINC was not inspected.

The inspection form will be completed immediately upon completion of the inspection. The inspection reports will receive a supervisory review, documented with a noted stamp or initials by the SI. Original inspection reports will be kept in the District for reference purposes for at least 2 years, with further disposition in accordance with the BOEMRE Records Management Handbook. Original inspection documents will be made available to the data entry personnel within 10 working days of the inspection for entering into the TIMS database.

When noncompliance is identified, a Notification of Incidents of Noncompliance (Form BOEMRE-1832) will be issued by OFO inspection personnel; operators may also be notified of regulatory noncompliance by letter and/or INC issued by other POCSR offices (see Chapter 3).

A listing of the inspection actions with facility names and dates will be maintained by the SI for use in inspection planning. Separate inspection records will be maintained for each facility. These records will be reviewed monthly by the SI to ensure that the desired inspection completeness objectives are achieved.

Annually, by the end of January, the DM will provide documentation to the

RS/OFO that both complete and partial (announced and periodic unannounced) inspections for the preceding year were performed by the District in accordance with this Policies and Procedures Document. Annually, by the first of April, the RS/OFO will document the above inspections and provide such documentation to the Regional Director, with inspection and INC statistics categorized by facility/activity and accompanied by analysis as appropriate.

F. Helicopter Use:

(1) Contract Management:

An employee in the California District will be designated the BOEMRE POCSR Contracting Officer's Representative (COR).

The COR will be directly responsible to the U.S. Department of the Interior's Office of Aircraft Services Contracting Officer (CO) for monitoring contract performance. Primary responsibility of the COR will be to assure compliance with the administrative provisions of the contract.

The CO, based on recommendation by the COR, will designate a Project Inspector (PI) to assist in implementing COR's instructions as required. Responsibilities of the PI generally include: (1) verifying services performed by the contractor; (2) ensuring Contractor's compliance with contract specifications and provisions; (3) discussing daily work requirements and ordering service within the contract provisions; (4) discussing the problems which occur with the Contractor and recommending proposed solutions to the COR; and (5) maintaining a log or written record of his/her administration of the contract, noting work assignments, equipment failure, etc. Any problems of a serious nature are immediately brought to the attention of the COR.

For further details refer to Appendix 2 of the Department of the Interior Manual Part 350 (DOI 350 DM 1).

(2) Safety Program:

The BOEMRE Handbook for Safety and Environmental Health Management (4895.1-H) details the established safety policy. Additionally, Chapter 5 of Part 485 of the Manual addresses Helicopter Safety, which includes Personal Protection Equipment and Employee Helicopter Water Ditching, Survival and Recovery Training. Interim Policy Document No. 07-10, *Helicopter Safety*, effective September 20, 2007, revises the employee training section of the BOEMRE Manual, Part 485.5, Helicopter Safety, by establishing new minimum training requirements for Helicopter Underwater Egress Training. Other safety

requirements are stated in the Office of Aircraft Services' "Aviation Policy Manual Part 350-324 DM."

(3) Flight Scheduling:

The SI or other inspection personnel will schedule and coordinate usage of the helicopter as necessary with consideration being given to the total number of personnel to be transported to inspection sites, payload and available fuel capacity, and areas where platforms are in close proximity. Inspections will be strategically planned to optimize utilization of limited resources.

(4) Riding in Operator's Helicopter:

Riding in an operator's helicopter should be limited to (1) unique situations, with prior approval by the DM, and (2) emergencies.

(5) Use of Helicopter for Official Government Business:

Official use of the helicopter will be in accordance with U.S. Department of the Interior Manual Part 350, General Program Requirements, Chapter 1, General Administration 350 DM 1.8.

(6) Visitors

Before flying offshore, visitors (i.e., persons other than BOEMRE POCSR inspection staff) must:

- (a) View the "Basic Helicopter Safety" video maintained in the CD,
- (b) Attend a pre-flight orientation briefing conducted by the pilot,
- (c) Take hydrogen sulfide training if appropriate, depending on the facility or facilities to be visited,
- (d) Be supplied with flight helmets and other Personal Protective Equipment (see Chapter 7), and
- (e) Have proper authorization for helicopter use (as detailed in the May 23, 2000, memorandum from the BOEMRE Director), with the documentation provided to the Regional Aviation Manager.

G. Lessee-Contracted Boats:

To increase inspection efficiency, the inspection personnel and other regulatory oversight personnel will utilize lessee-contracted boats for transport to nearshore platforms in the Santa Barbara Channel on foggy days, when appropriate. The inspection and other personnel will take any transportation-related training offered by the lessee (such as swing rope or personnel basket transfer) before utilizing the boats.

H. Ethics and Related Topics:

All BOEMRE personnel are bound by the ethics requirements and guidelines outlined on the BOEMRE Ethics Office Website, at <http://pipeline.BOEMRE.gov/Topics/EmployeeInfo/Ethics.aspx>. The internal website includes links to Bureau-specific guidelines, the BOEMRE Code of Ethics and related information.

In addition, inspection personnel and other regulatory oversight personnel conducting inspections under this P&PD are also subject to the requirements detailed in the following documents:

- (1) Memorandum from the Regional Director, POCSR, to All Employees, POCSR, dated June 25, 2010, Subject: *Termination of the Practice of Accepting Free Meals from Operators*

Summary: BOEMRE POCSR employees may not accept free meals from offshore operators because that is contrary to ethics law and policy. Bottled water may continue to be accepted. The restriction does not apply to employees who are scheduled to stay offshore overnight for multiple day inspections or required to stay offshore overnight due to inclement weather. Refer to the memorandum for additional details.

- (2) Memorandum from the Regional Director, POCSR, to Program Office Managers, District Manager, and Section Chiefs, POCSR, dated July 6, 2010, Subject: *Inspection Policy*

Summary: Regional and District inspection personnel shall report to their Regional Supervisor immediately any industry pressure to not issue Incidents of Noncompliance (INC's); Inspection Assignments in the District must be made by the Supervisory Inspector; notification to the operator of an "announced inspection" will be done only by the inspector(s) that will be conducting that inspection or the Supervisory Inspector; any harassment from other BOEMRE employees to write or not to write INC's must be reported to your Regional Supervisor. Refer to the memorandum for additional details.

- (3) Memorandum from the BOEMRE Director, to All BOEMRE District Employees, on August 30, 2010, Subject: *Policy Regarding Interference with the Performance of Official Duties and Potential Conflicts*

Refer to the memorandum for information under these headings: Interference with the Performance of Official Duties, Procedures for Reporting Interference, Conflict of Interest and Recusal, Conflict of Interest/Recusal Procedures, Former Employment Restricts, Current District Employees, Newly Hired District Employees, and Other Reporting Procedures.

Pursuant to the September 8, 2010, e-mail from the Regional Supervisor, Office of Field Operations, substitute “Regional Supervisor” for “Deputy Regional Supervisor” with regard to the procedures for reporting interference and other topics. In the forwarded e-mail chain, the Acting Chief, Office of Offshore Regulator Programs stated that “there may be some additional language to clarify that this memo also applies to those Regional people who are involved in the permitting process....”; that revision has not yet been made.

PACIFIC OCS REGION POLICIES AND PROCEDURES DOCUMENT

CHAPTER 3. INCIDENTS OF NONCOMPLIANCE

1. Purpose: This chapter defines responsibilities and procedures related to the issuance and processing of Incidents of Noncompliance (INC's).

Enforcement actions ensure that any noncompliance with safety and pollution prevention requirements detected by BOEMRE is corrected by the operator. To provide objectivity, the appropriate notification and mandatory enforcement action for each INC observed is indicated on the PINC List. Enforcement actions consist of (1) a written warning, (2) component (zone [well], equipment, or pipeline) shut-in, or (3) complete facility (platform or mobile offshore drilling unit) shut-in.

2. Responsibilities and Procedures:

A. Noncompliances: The DM is responsible for ensuring that each noncompliance identified during an inspection results in issuance of an INC and that the appropriate enforcement action and follow-up are taken. (For Office INC's, the Chief of the section or Regional Supervisor of the program office issuing the INC is responsible for these tasks.)

- B. Documentation and Procedures:

- (1) All noncompliance with the regulations, Notices to Lessees and Operators (NTL's), lease terms and stipulations, approved applications and plans, and approval conditions detected during an inspection will be immediately documented by the inspection personnel on an INC form, officially titled "Notification of Incidents of Noncompliance" (Form BOEMRE-1832).

POCSR offices may also notify an operator by letter when an incident of noncompliance is detected, such as noncompliance with a regulatory requirement that does not have a corresponding PINC. (BOEMRE has issued Office PINC's, updated in May 2008, so there will be fewer regulatory requirements that do not have corresponding PINC's.) The letter will identify the violation, specify the necessary corrective action and a time frame for that corrective action if appropriate, and provide information on the BOEMRE offshore appeal process. If an INC form is used, a letter may accompany the INC, to provide more information to the operator or to emphasize certain points.

- (2) Form Completion Procedure: The INC form is divided into three parts: the top portion for BOEMRE, facility and operator information; the

middle portion for INC description, enforcement action and correction date(s); and the bottom portion for signatures and compliance certification.

The bottom portion of the INC form has three boxes, reserved for (a) "Signature of BOEMRE Representative," (b) "Signature of Operator Representative" and date of signature, and (c) operator "Manager/Supervisor" signature and date of signature. The most senior onsite person representing the operator (or lessee; all references in this document to the operator would apply to the lessee instead, if operations are conducted by an exclusive owner of record) shall be asked to sign (not initial) in the second box, designated "Signature of Operator Representative," at the time the INC is issued, to acknowledge receipt. The third box, for certifying that each INC listed in the middle portion of the INC form has been corrected on the corresponding date(s) entered under the adjacent "Date Corrected" column, may not be completed by the onsite Operator Representative, even if the INC is corrected prior to the BOEMRE Inspector departing the facility. This is to ensure that personnel in the area/field office who are responsible for overall operation at the facility are aware of the deficiencies found by BOEMRE Inspectors.

- (3) The Inspector will also verbally advise the Operator Representative of the facility being inspected of all noncompliances identified by the inspection. The Inspector will advise the Operator Representative of the necessary corrections to be made within the time specified in the INC form, and that the operator must notify the DM in writing as to when the INC was corrected.
- (4) After the Operator Representative has signed each INC form, the Inspector will give the yellow and green copies of these INC forms to the Operator Representative before leaving the facility. The yellow copy is for the operator's records; the green copy must be returned to the BOEMRE District office when the deficiency is corrected. When an INC is issued to an operator as a result of contractor noncompliance, the blue copy is to be given to the Contractor Representative for his/her records. If a Contractor Representative is not available on the facility, the blue copy is to be left with the operator. The white original is brought back to the office, initialed by the DM and SI, and placed in the INC active file until the green copy is received back from the operator.
 - (a) The time limit for the corrective action and returning the green copy of the INC form to the BOEMRE is 14 days unless otherwise specified on the INC form by the Inspector.
 - (b) The operator may request an extension of time from the DM to

correct an INC or to return the green copy of the INC form. If granted, this extension is noted on the white original, which remains in the INC active file until the green copy is returned by the operator. Verbal approvals will be confirmed in writing.

- (c) A copy of all INC's issued will be attached to the applicable inspection form by the Inspector for timely inputting into TIMS by the CD.
- (d) When the green copy of an INC is received in the district, it is initialed by the DM.

- (5) For purposes of this document, there are three INC categories:

Category 1: INC's that are non-correctable: An INC issued when no corrective action can be taken (e.g., casing set and cemented other than approved).

Category 2: INC's that are corrected at the time of inspection: An INC issued and noted as corrected on the INC form by the BOEMRE Inspector prior to departing the facility.

Category 3: INC's that require follow-up action: An INC issued which cannot be corrected prior to the BOEMRE Inspector departing the facility. A follow-up inspection to confirm compliance will be conducted at the next scheduled inspection date for the facility or as requested by the operator (time and weather constraints may change date of follow-up).

Processing of Category 1 and 2 INC's is complete, with no further action required, when the signed green copy of the INC form is received from the operator within the allotted time. The green copy is then attached to the white original and both are placed in the lessee operations file. Special circumstances may cause Category 1 and 2 INC's to be treated as Category 3 INC's.

For Category 3 INC's, the signed green copy of the INC form sent back by the operator is attached to the white original, and both are placed in the INC active file where they remain until follow-up inspection verifies compliance. When no further action is required, both copies of the INC are moved to the lessee operations file.

The INC active file and lessee operations files are maintained by the SI.

- (6) For a noncompliance with a shut-in enforcement action, notification will be given that the operation is not authorized to continue until the

noncompliance has been corrected and approval is given by BOEMRE to resume operation.

- (a) The inspection personnel will provide the Operator/Lessee Representative of the facility with written orders to shut-in the facility and advise the operator that the DM or his representative must be contacted for approval prior to resuming operations.
 - (b) The SI will notify the DM daily of all noncompliances that require a facility to be shut-in, by giving the DM a copy of the INC. The DM will initial or stamp his notation on the copy.
 - (c) Within 24 hours, the DM will notify the RD of any actual facility shut-in (not component shut-in) lasting longer than 24 hours resulting from BOEMRE enforcement action.
 - (d) The DM must give authorization to resume service of the facility. If verbal authorization is given, the DM will confirm in writing, giving date and time of verbal authorization.
 - (e) When an INC for a component shut-in is issued, the inspection personnel will provide the Operator/Lessee Representative with written orders to shut-in the component. The Inspector will specify on the INC form whether (1) the component can be returned to service when correction has been made or (2) the DM has to be notified and permission obtained prior to resumption of operation. The DM will determine if re-inspection is required.
- (7) All operator corrective actions will be reviewed and documented by the inspection personnel on a copy of the INC form.
 - (8) All follow-up action as needed to confirm the corrective action will be documented by the SI on the District's file copy of the INC form.
 - (9) The SI shall maintain the files of original INC forms in the District Office.
 - (10) Rescinding of INC's: If circumstances make it appropriate to rescind an INC, the DM shall document in writing to the operator the reason the INC is invalid and send copies to the appropriate file. The INC will also be removed from the inspection data base.
 - (11) Closing Out INC's: The returned green copy of the INC form, with the operator manager/supervisor's signature, date of signature, and the date the INC was corrected, shall be filed along with other correspondence pertaining to the INC in the District for reference purposes for at least 2

years, with further disposition in accordance with the BOEMRE Records Management Handbook. Other correspondence may include:

- (a) Written documentation of a verbal approval from an authorized District representative to return a shut-in component or facility to operation;
 - (b) Written documentation of an extension of time for correcting an INC;
 - (c) Written documentation of an extension of time for returning the green copy to the District;
 - (d) Letters pertaining to shut-in actions;
 - (e) Operator/lessee correspondence for specific INC's;
 - (f) Civil or criminal penalties correspondence.
- (12) Disqualification: In 30 CFR 250.136, INC's are identified as one of the factors that will be considered when the BOEMRE is determining if an operator's performance is unacceptable. (Other factors include accidents and their nature; pollution events, environmental damages and their nature; civil penalties; failure to adhere to OCS lease obligations; or other relevant factors.)

If operating performance is determined to be unacceptable, BOEMRE may, in accordance with 30 CFR 250.136, disapprove or revoke a designation of operator on a single facility or multiple facilities. BOEMRE will give adequate notice and opportunity for a review by BOEMRE officials before imposing a disqualification. There may be a probationary period during which the operator would submit a Performance Improvement Plan and demonstrate satisfactory improvement to preclude disqualification. Additional information on this process is covered in the National OCS Inspection Program P&PD, April 2000, pages 18-21.

PACIFIC OCS REGION POLICIES AND PROCEDURES DOCUMENT

CHAPTER 4. CIVIL OR CRIMINAL PENALTIES

1. Purpose: This chapter defines responsibilities related to the assessment of civil penalties and the referral for initiation of criminal penalty proceedings. Civil or criminal penalties may be pursued when an act is determined to be in violation of the requirements of the OCS Lands Act as amended, regulations or orders.
2. Objectives: This chapter outlines the assignment of responsibilities for detection of and notification concerning violations subject to civil or criminal penalties.
3. Authority: The authority for assessment of civil penalties is contained in the OCS Lands Act, Section 24(b) [43 U.S.C. 1350(b)], and BOEMRE's implementing regulations are at 30 CFR 250.1400 to 250.1409, Remedies and Penalties.

Criminal penalties are covered by the OCS Lands Act, Section 24(c) [43 U.S.C. 1350(c)] and coordinated by the Department of the Interior's Office of the Inspector General.

4. References:
 - A. BOEMRE Manual Part 560, Chapter 2, OCS Civil/Criminal Penalties Program
 - B. OCS Civil/Criminal Penalties Program Guidebook, May 2007
 - C. National Notice to Lessees and Operators (NTL) No. 96-7N, OCS Civil Penalties Program, December 10, 1996 (modified by No. 2007-N02, Revised Assessment Matrix, March 30, 2007)

5. Responsibilities:

Civil Penalty:

The SI will consult with the DM concerning those violations which may warrant civil penalty proceedings, and initiate the civil penalty review in TIMS, if the decision is made to pursue civil penalty review. Outside the CD, the appropriate program office Regional Supervisor (RS) or Section Chief (including Chief, Environmental Analysis Section) will be consulted by staff concerning violations that may warrant civil penalty proceedings.

The DM or RS/Section Chief will approve or initiate a civil penalty review in TIMS whenever a violation occurs for which a civil penalty may be warranted. The DM or RS/Section Chief will send a case file to the Regional Civil/Criminal Penalties Program Coordinator (Regional Coordinator), C/OSES. OSES will review the case file for

completeness and forward it to the Reviewing Officer.

The DM or RS/Section Chief will consult with the RS/OLE for a determination on whether a threat to the environment was posed by the violation being recommended for civil penalty review.

The Regional Coordinator will inform the operator involved in the violations(s), in writing, that civil penalty review is underway when a case is forwarded to the Reviewing Officer (the RD will be provided with a copy of the letter).

Criminal Penalty:

If an BOEMRE employee has reason to believe that a violation of the criminal statutes has occurred, the employee is to report the alleged violation to his/her supervisor. With respect to BOEMRE Inspectors, that person will be the District Manager. In other instances, the first-line supervisor (such as a Section Chief) will, in turn, report the alleged violation to the Regional Coordinator.

The DM or Section Chief will consider criteria specified in the Guidebook to determine if there is sufficient information to warrant a referral to the Office of the Inspector General (OIG). If the DM determines there is sufficient information to warrant a referral, the DM will consult with the RS/OFO and then inform the Regional Coordinator. If the Section Chief determines there is sufficient information to warrant a referral, he/she will inform the Regional Coordinator. In such cases, the Regional Coordinator will notify the nearest OIG Investigative Field Office for consultation or referral. However, the Regional Coordinator will first notify the BOEMRE National Coordinator and the Office of the Solicitor. The Regional Coordinator will also confer with appropriate RS's and the RD.

Every employee also has the right to directly (anonymously if preferred) contact the OIG using the OIG Hotline: 8-1-(800) 424-5081.

6. Procedures: The procedures for accomplishing the responsibilities of this chapter are:
 - A. Investigation of violations will be conducted by the OFO and/or other POCSR staff.
 - B. Civil penalty cases shall be processed by the Reviewing Officer in accordance with 30 CFR 250.1405 to 250.1409. In reviewing a case, the Reviewing Officer may request additional technical or other information from POCSR personnel.
 - C. Cases that may warrant criminal penalties will be referred to the OIG for investigation and review. BOEMRE will also notify the Office of the Solicitor.
 - D. The detailed procedures for accomplishing the responsibilities of this chapter are contained in the OCS Civil/Criminal Penalties Program Guidebook.

7. Records: All District inspection documents and paper records relating to civil or criminal penalties will be kept in the SI's files or in the POCSR vaults. All the OSES case files relating to civil or criminal penalties will be kept in a locked cabinet in Vault B.

PACIFIC OCS REGION POLICIES AND PROCEDURES DOCUMENT

CHAPTER 5. INSPECTION DATA BASE

1. Purpose: This chapter defines responsibilities related to the creation, data entry, and maintenance of the POCSR inspection data base, and use of inspection and related data to select Safety Award for Excellence winners.
2. Objectives: This chapter outlines the assignment of responsibility for the inspection data base.
3. Authority: The authority for the maintenance of the Inspection Data Base is contained in the BOEMREM 650.1.
4. Responsibilities:

District:

The District's original inspection reports will be made available to the data entry personnel within 10 working days after inspection. The 10-working day time frame is necessary to help ensure timely data entry and allow timely utilization by BOEMRE offices for internal analysis and response to outside inquiries. The DM or the SI will ensure all inspection data are correct and complete before providing the data for data entry into TIMS.

The data entry personnel overseen by the District will enter all inspection data into TIMS within 15 working days of the data becoming available. Designated personnel in the District office have editing capabilities for the TIMS inspection data base. (The District office will have data retrieving and analyzing capabilities for use as needed.)

On a quarterly basis, the District's Contracting Officer's Representative for the POCSR Data Entry & Document Scanning Services Contract will query the Inspection component of the TIMS database to obtain the number of Inspections and Enforcements, by type; verify/confirm the data with the District; and then submit the data for inclusion in the Regional Quarterly Operations Report.

5. Procedures: The procedures for accomplishing the inspection data base responsibilities are as described above.
6. Records: All of the District's inspection data base documents and records will be kept in the Supervisory Inspector's files or in the regional vaults. Inspection data may be temporarily in the custody of data entry personnel, with the data kept in a locked cabinet

pending completion of data entry.

7. Safety Award for Excellence (SAFE):

The SAFE Program will be used to recognize and commend operating companies and contractors that expend extra effort in conducting their operations in a safe and pollution-free manner by adhering to all regulatory requirements, employing trained and motivated personnel and going beyond mere compliance. Operators considered for this recognition take extra steps to enhance operational safety and environmental protection.

The BOEMRE District office will evaluate the performance of all operating companies, including contractors, through the inspection program. The District will annually compile all inspection data results. Based on those data and other performance-related factors, the District will select any District SAFE winners by February of each year for the previous year. (BOEMRE Headquarters will consider all District winners in the selection of the National SAFE winners.)

The District awards will be presented annually to the winners at public events or at functions held at POCSR/District office sites. The award includes a plaque signed by the BOEMRE Director and a citation signed by the Regional Director. District staff will coordinate acquisition of the plaque and citation, notify the POCSR Web Master (who coordinates with the Information Technology Section) so that the POCSR website will be updated to reflect the new winners, and notify Public Affairs personnel so that press releases can be issued.

PACIFIC OCS REGION POLICIES AND PROCEDURES DOCUMENT

CHAPTER 6. INSPECTOR TRAINING & CERTIFICATION

1. Purpose and Objectives: This chapter defines responsibilities related to the training of inspection personnel, who perform onsite inspections of facilities within the jurisdiction of the Pacific OCS Region. Inspector training is required to ensure that inspections are performed by individuals who are fully knowledgeable about OCS operations, safety procedures, maintenance of environmental quality, and BOEMRE inspection/regulatory requirements methodology.
2. Responsibilities and Procedures:
 - A. Course Selection: The DM will ensure that the Inspectors receive all necessary training, including continuing professional training. (The training identified in the Job Safety Analysis for Inspector positions, which was distributed by the Associate Director for Offshore Minerals Management by memorandum dated December 29, 2000, will be included.) The DM will review personnel and training records to ensure that Inspectors have proper training prior to their performing duties independently. The DM will evaluate each Inspector's knowledge and skills and work with the Inspectors to obtain the needed training.
 - B. Other BOEMRE Training: Inspectors will take electrical training provided by the designated BOEMRE Regulations and Standards Branch engineer.
 - C. Records: All Inspector training, including on-the-job training, of 8 hours or more shall be documented by the inspection personnel on Form SF-182. Training of shorter duration will be documented by memorandum signed by the DM. The records will show:
 - (1) An annual schedule of training for each Inspector
 - (2) Name of trainee
 - (3) Description of the training
 - (4) When they were trained and the duration of the training.
 - (5) Who did the training
 - (6) Certification by the Inspector and the DM that training has been accomplished
 - (7) When an Inspector has completed the required training and met other requirements listed in "Inspector Training and Certification Program" to be eligible for grades GS-9 and above

Annually, by the end of March, the DM will provide documentation to the RS/OFO listing items 1 - 7 on all Inspectors for the preceding year.

PACIFIC OCS REGION POLICIES AND PROCEDURES DOCUMENT

CHAPTER 7. PERSONAL PROTECTIVE EQUIPMENT (PPE)

1. Purpose: This chapter describes requirements for the use of Personal Protective Equipment (PPE) for aviation, inspection, and other onsite activities in the POCSR. For this document, the term PPE covers both clothing and equipment items. In addition, BOEMRE has established a mandatory medical qualification and evaluation program designed to safeguard the health and safety of all employees working in the offshore environment, and this chapter provides some details on the program.
2. Policy: It is the policy of POCSR that appropriate PPE be made available and used whenever personnel participate in offshore activities, and that District personnel involved in onsite inspection activities participate in the BOEMRE Medical Standards Program.
3. References:
 - A. Departmental Manual, Part 351, Chapters 1, 2, and 4.
 - B. Departmental Manual, Part 352, Chapters 1 and 2.
 - C. Departmental Manual, Part 485, Chapter 20.
 - D. Minerals Management Service Manual, Parts 485.2.3B and 485.2.3E.
 - E. Aviation Life Support Equipment (ALSE) Handbook, 351 DM 1.
 - F. Job Safety Analysis for Inspectors, transmitted by memorandum from the Associate Director for Offshore Minerals Management, dated December 29, 2000.
 - G. BOEMRE Medical Standards Program information available via link at <http://www.BOEMRE.gov/adm/BOEMREmind5page.htm>
 - H. Interim Policy Document No. 07-01, Prescription Safety Glasses, effective June 6, 2007
4. PPE Requirements:
 - A. Fire-Resistant Clothing: Offshore oil and gas facilities and transportation by helicopter both involve the potential for fire hazards. The primary purpose of fire-resistant clothing is to provide the wearer with protection from flash fire burns.

- (1) Material: The approved fire-resistant materials for gloves, shirts, pants, and other outerwear garments are Nomex, polyamide, aramide, polybenzimidazole, Kevlar, or blends thereof.
- (2) Outerwear Garments: These garments consist of coveralls, bib pants, coats, jackets, pants, shirts, etc. POCSR requires that these garments be made of the fire-resistant materials referenced above. At this time, the POCSR does not require the use of flight suits.
- (3) Undergarments or Garments Worn Under the Coverall: Underwear (normal temperature or cold weather insulating) and other clothing, i.e., work uniforms, worn under the coverall will provide the best protection if made of the fire-resistant materials referenced above. Fire-resistant cotton, fire-resistant cotton blends, or natural fibers (cotton, wool, or wool/cotton blends) are acceptable substitutes. Undergarments or garments worn under the coverall which have direct contact with the wearer's skin present an unacceptable exposure to post-mishap fire injury if made of materials containing low-melt synthetics.
- (4) Gloves: Gloves made from the fire-resistant materials listed in Section 4.A.(1) above are part of the baseline outfit, for use during helicopter transportation.
- (5) Boots: Boots must be steel-toed and made of all-leather uppers that come above the ankles (the higher, the better). The boots shall be constructed so that metal parts, shoestring eyes, or zippers are protected by leather from contact with the wearer's ankles.

B. Impact, Hearing and Eye Protection Equipment:

- (1) Impact Protection:
 - (a) Flight Helmets: According to the ALSE Handbook (351 DM 1) 2.4, "... DOI approved flight helmets provide the impact protection required for special use missions. These helmets, when properly fitted, will also provide the OSHA-required hearing protection in most flight environments." The SPH-5 helmet is the current "standard" helmet for helicopter special use missions. This new standard does not preclude continued use of the SPH-4 helmet. When the need arises to repair or replace an SPH-4, the RS/OFO will decide whether to repair the existing SPH-4 or replace it with an SPH-5.
 - (b) Hard Hats: Hard hats will be provided for all personnel

participating in offshore inspections. See Section 6 below for Baseline Outfit definitions and Replacement Allowances.

(2) Hearing Protection:

- (a) Flight Helmets: According to the ALSE Handbook (351 DM 1) 2.4 B, "...Hearing protection is required by the DOI Hearing Conservation Program (HCP) in all locations having a noise exposure equal or exceeding an 8-hour time weighted average (TWA) sound level of 85 decibels (dB). This will include inside most helicopters, some airplanes and on nearly all aircraft parking ramps and heliports during aircraft operations." Flight helmets are designed to provide this protection in-flight.
- (b) Earplugs: All Inspectors and other personnel will be provided with earplugs for use on OCS platforms as necessary to protect their hearing in locations with significant noise exposure.
- (c) Audiometric Testing: To monitor hearing ability and evaluate hearing protection practices, personnel who regularly go offshore will be provided audiometric tests. These tests will be arranged by the C/OSES on a yearly basis.

(3) Eye Protection:

- (a) Flight Helmets: According to the ALSE Handbook (351 DM 1) 2.4 C, "DOI requires eye protection in work environments where particle air contaminants are present. This includes aviation activities in dusty areas such as off-airport helicopter landing areas. Flight crews wearing approved helmets are protected by using the attached visors. Support personnel and other assigned tasks near aviation activity caused contaminants shall wear appropriate eye protection."
- (b) Safety Glasses: Besides the eye protection provided by the in-flight helmet, it is BOEMRE policy to provide safety glasses to protect employees' eyes from physical, chemical or other agents during inspections.

Upon initial employment with the BOEMRE, the employee's first-line supervisor will review the employee's job responsibilities with the employee and determine if protective eye wear is needed. Typically, persons whose responsibilities include those listed below will be provided with agency-issued eye wear:

- (i) Job responsibilities that require regular work on the offshore platforms
- (ii) Work in an "eye protection required" area, on a regularly scheduled basis
- (iii) Are considered "field personnel" or frequent helicopter flyers

Persons whose needs and job functions do not require the continual or routine use of personal protective eye wear will be provided with agency-supplied, American National Standards Institute (ANSI) approved non-prescription protective eye wear. This includes casual and occasional field personnel.

An employee must see his/her first-line supervisor if a reissue of safety glasses is required. Acceptable reasons for a reissue include:

- (i) The employee's prescription has changed.
- (ii) The glasses protected an employee during an accident and were damaged.
- (iii) The glasses are worn out. Specifically, the lenses are scratched or cloudy, or the frames are loose, bent or broken.

Prescription safety glasses must meet the criteria set forth in the ANSI Standard Z87.1, *Occupational and Educational Personal Eye and Face Protection Devices* per the Interim Policy Document No. 07-01, Prescription Safety Glasses, effective June 6, 2007. Personal protective eye wear shall have permanently attached folding side shields that are appropriate and integral to the design of the frames. Frames must be chosen with superior lens retention ability. All lenses will be appropriate for the employee's job function. Additionally, an employee who may be exposed to high velocity impact hazards should consider the use of polycarbonate lenses because of their superior resistance to shattering.

- (c) Visitor Clothing and Equipment. The BOEMRE will provide protective clothing and equipment for visitors as necessary. The items available for use during visits will be as specified under the Safety Clothing and Safety Equipment Baseline Outfits described

in Section 6 below.

5. Administrative Responsibilities:

A. Purchasing and Replacing:

(1) Safety Clothing (shirts, pants, coveralls, jackets and gloves):

The District is responsible for developing a method of tracking each person's (and the visitors') clothing allowance and how it is spent.

For purposes of this document, visitors are classified in two categories: 1) Regional (POCSR employees who are infrequent flyers) and 2) Others (Headquarters, other Regions, other Government Agencies [State, County, etc.], or non-Federal/non-Government personnel).

(2) Equipment (boots, hard hats, flight helmets, ear plugs, and safety glasses):
The District will, for frequent and infrequent flyers, purchase:

Boots from a local vendor, such as "Red Wing Shoe Store" or another comparable store.

Hard hats from an appropriate vendor such as Cal Safety.

Repair or replace flight helmets through appropriate vendors such as the National Interagency Fire Center.

Earplugs from a local vendor or appropriate mail order/internet supplier.

Safety glasses. Any District personnel requesting prescription safety glasses need to submit a current prescription with a requisition. Any District personnel requesting non-prescription safety glasses need only submit a requisition. As stated above, prescription safety glasses must meet ANSI Standard Z87.1, *Occupational and Educational Personal Eye and Face Protection Devices* criteria.

B. Storage: The District will designate an area for storing visitor clothing and equipment when not in use. The storage area should be in a secured area. The District Manager will designate a person(s) to track the use of clothing and equipment using a method such as a sign-out/return log for all items.

C. Maintenance: All full-time and part-time wearers (frequent flyers) are responsible for the upkeep of their individual clothing and equipment. Regional visitors (infrequent flyers) will launder or dry clean clothing items such as jumpsuits prior to returning it to the District. Regional visitors will return all

equipment in the same condition as when it was borrowed. The District Manager will designate a person(s) to launder or dry clean the clothing used by other visitors (infrequent flyers). The laundering/dry cleaning will be done locally and receipts for charges can be submitted for reimbursement. The other visitors will return all items (clothing and equipment) to the designated person(s) in the District.

To preserve the fire resistance quality of Nomex or similar materials, garments made of such materials must not be starched, according to the ALSE Handbook. Dry cleaning or laundering and tumble-drying at temperatures up to 180 degrees Fahrenheit will not shrink or damage such garments.

6. Baseline Outfits (Safety Clothing and Equipment) and Replacement Allowances:

A. Full-time Wearers and Part-time Wearers:

- (1) Full-time wearers are personnel whose duties require wearing a uniform at least 3 days a week.
- (2) Part-time wearers are personnel whose duties typically require uniforms less than 3 days a week.

B. Clothing Baseline Outfits:

- (1) Full-time wearer: Shirts--5; Pants--5; Coverall/Flight Suit--1; Lightweight Jacket--1; Insulated Jacket--1; Gloves--1 pair.
- (2) Part-time wearer: Shirts--1; Pants--1; Coverall/Flight Suit--1; Lightweight Jacket--1; Insulated Jacket--1; Gloves--1 pair.
- (3) Visitors: Coverall/Flight Suit--1; Lightweight Jacket--1; Gloves--1 pair.

C. Clothing Replacement Allowances:

- (1) Full-time wearer: \$600 yearly
- (2) Part-time wearer: \$300 yearly
- (3) Visitors: \$500 yearly (includes dry-cleaning fees)

C. Safety Equipment Baseline Outfits:

- (1) Full-time wearer: Boots--1 pair; Hard Hat--1; Flight Helmet--1.
- (2) Part-time wearer: Boots--1 pair; Hard Hat--1; Flight Helmet--1.

- (3) Visitors: Boots--1; Hard Hat--1.

E. Safety Equipment Replacement Allowances:

- (1) Full-time wearer: \$200 yearly
- (2) Part-time wearer: \$200 yearly
- (3) Visitors: \$200 yearly
- (4) Flight helmets will be replaced only as new technology or the condition warrants.
- (5) The maximum cost limit for prescription safety glasses at BOEMRE expense is \$500, but the supervisor may waive the maximum cost limit of the prescription safety glasses based upon justification that it is in the best interest of BOEMRE, in accordance with Interim Policy Document No. 07-01, Prescription Safety Glasses, dated June 6, 2007.

7. BOEMRE Medical Standards Program (MSP)

BOEMRE has established a mandatory medical qualification and evaluation program designed to safeguard the health and safety of employees working in the offshore environment. The BOEMRE Manual establishes the policy and procedures for the MSP. The program is detailed in Parts 485.7 and 485.7-H (Handbook), effective date October 27, 2005.

As stated in the Manual,

- “A. Enrollment in the MSP will be based on a position’s exposure to arduous physical exertion or hazardous conditions during visits to platforms, rigs, or other hazardous work areas. Satisfying the requirements of the MSP will be a condition of employment.
- B. All BOEMRE employees whose job requirements subject them to significant health or safety risks due to occupational/environmental exposure or demands during visits to offshore sites will be required to participate in the MSP.
- C. Supervisors will review each employee’s position description annually to determine initial exposure and validate continued exposure for inclusion in the MSP.”

At this time in the POCSR, only employees in the CD participate in the MSP. Participants undergo annual physicals and hearing and vision tests.

PACIFIC OCS REGION POLICIES AND PROCEDURES DOCUMENT

CHAPTER 8. INTERNAL REVIEW

1. Purpose: This chapter defines responsibilities related to internal review of the Region's Inspection Program, which includes POCSR regulatory oversight activities in OFO and the other program offices.
2. Objectives: This chapter is the Regional Director's assignment of responsibility for planning, performing, and documenting internal reviews of the Region's Inspection Program.
3. Authority: The authority for performing internal review is contained in the BOEMRE Manual (Part 650, Inspections; Chapter 1, Offshore Inspection Program).
4. Procedures: The Deputy Regional Director (DRD) is the Internal Review Officer and responsible for selecting an Internal Review Team Leader (Team Leader). The Team Leader and selected BOEMRE personnel make up the Internal Review Team (IRT), which will conduct an annual review of the Region's Inspection program to ensure that all phases of the program are in compliance with this Document and other instructions.
 - A. IRT Qualifications: The DRM selects the team member(s) from personnel within the Region who have the following:
 - (1) Non-involvement in the area being reviewed: Each member must not be involved either directly or indirectly with the activity being reviewed. Supervising the activity or working for the supervisor of the activity are examples of indirect involvement. A member can review activities conducted by other program offices, but then recuse himself/herself (i.e., not participate) during the portion of the review focusing on activities conducted by his/her own program office. The DRD may also request personnel from other Regions or Headquarters to supplement the team.
 - (2) Professionalism: Each member must have the ability to deal professionally with personnel at all levels of the organization.
 - (3) Communication skills: Each member must be able to communicate with all levels of the organization both orally and in writing. The oral skills are needed to conduct the review and the writing skills are needed to document the findings of the review.
 - (4) Objectivity: Each member must have an objective attitude to undertake

the review. If the member starts the review with preconceived ideas, it is likely that he or she will either find noncompliances that do not in fact exist or overlook noncompliances that do exist. In either case, the review will not give an accurate picture of the degree of the activity's compliance or noncompliance with the Region's procedures. The member must be willing to report all nonconformances found and to suspend judgment of the importance of nonconformances until the end of the review.

- B. Orientation: The RS/OFO or DM and Chief/OSES will provide the IRT with an orientation overview of the Region's Inspection Program and related copies of all Instructions or Procedures. The Regional Supervisor of the other program offices or his/her designees will provide information on those offices' inspection/regulatory oversight activities.
- C. Scheduling and Notification of Reviews: The DRD will establish the date for the Internal Review so that every element of the Offshore Inspection Program is reviewed at least once every calendar year, covering activities for the previous calendar year. This review will include all regional Inspection Program and related oversight activities and all of the activities in the District. The IRT will notify the RS/OFO, RS/OLE and RS/OPDRE of the proposed schedule for the reviews at least 30 calendar days before the reviews begin.
- D. Checklist Preparation: At least 7 calendar days prior to the review, the RS/OFO, RS/OLE and RS/OPDRE will submit to the DRD, for review, revision, and approval, checklists for selected activities covered in the P&PD or Instructions. This checklist covers the activities to be reviewed and will be used by the IRT.

The IRT examines the Region's procedures (i.e., P&PD) to verify that the checklist covers procedural requirements for the activity. If a change to the checklist is required, the change is made by the IRT who notifies the checklist preparer of all changes made to the checklist.

The checklist should contain only those items which can be checked objectively. An item that relies on the judgment of the IRT is not objective and thus does not belong on the checklist. Items are verifiable when the Region's procedures clearly define the following:

- (1) The task to be accomplished.
- (2) The specific individual(s) either by name or title (title preferred) who are to accomplish the task.
- (3) When and where the task is to be accomplished.
- (4) Where records of the accomplishment of the task are maintained.

Items are not verifiable if they rely on the judgment of the person involved, contain vague and ambiguous terms or general statements that do not obligate individuals to do anything. Examples of vague, ambiguous terms are:

as appropriate	when appropriate	if appropriate
as required	when required	if required
as needed	when needed	if needed
proper	in his/her judgment	

These terms rely on judgment and can lead to misunderstanding when the judgment of the IRT and the manager of the activity being reviewed do not agree.

E. Conducting the Review:

- (1) Methodology: The onsite review by the IRT of an activity is conducted by:
 - (a) Holding an entrance discussion with the manager of the activity being reviewed, identifying how the review is going to be conducted and obtaining his/her suggestions.
 - (b) Using the checklists and a list of open deficiencies from the previous review to ensure that all areas of the activity are reviewed. The checklists will require that the program offices certify that the new and updated procedures stemming from the previous year's review were implemented during the current review year.
 - (c) Documenting all deficiencies.
 - (d) Holding a closing discussion with the manager of the activity being reviewed that covers the identified deficiencies so that both parties are in agreement on the facts. The manager of the activity being reviewed should be given the opportunity to offer additional information that may be relevant.
 - (e) Preparing a written report to the manager of the activity being reviewed identifying the deficiencies, the need for an action plan, and the date when the plan is due.
- (2) Guidelines: The following guidelines are used by the IRT in conducting the onsite review:
 - (a) IRT should keep a record of anything that was reviewed (the

checklist is a good place to do this).

- (b) The IRT should discuss the review with the manager of the activity being reviewed and let the manager of the activity being reviewed direct the IRT to the people within the activity.
 - (c) The IRT should use the checklist as a tool and starting point for the review, not an end in itself. The objective is to perform an onsite verification of procedure compliance, not just to complete the checklist.
 - (d) If the checklist shows a problem, the IRT should make every attempt to understand what is occurring. This understanding is necessary for the IRT to evaluate the action plan and determine if it appears to be effective.
 - (e) When there are a large number of records to be checked, the IRT should use a sample. When there are a small number of records, they should all be checked.
 - (f) When a deficiency is found, the IRT should ensure that the members of the organization being reviewed concur that procedures were not followed. This communication allows the organization the opportunity to present additional information.
 - (g) The IRT should be objective and document every deficiency no matter how small. The time for judgment is after all deficiencies have been identified; then, the importance of the various deficiencies can be assessed.
- F. Deficiencies and Program Improvements: The manager of the activity being reviewed will receive from the IRT both verbal and written notice of all deficiencies identified in the activity and will prepare an action plan for each deficiency. This plan will identify the actions that were or will be taken to resolve the deficiency and to preclude a recurrence of this type of deficiency. This plan will be submitted to the IRT within 15 working days of receipt of the written notification. The IRT will advise the manager of any suggestions or program improvements that become apparent during the review.
- G. Documentation of Review Results: The Team Leader will submit a memorandum to the DRD within 30 calendar days after completion of the review (excluding follow-up actions). The review is considered complete when all of the action plans have been accepted. The memorandum will summarize the events of the review, present findings (including deficiencies and known corrective actions), and include the IRT's recommendations for changes to regional policy and for

program improvements. A copy of this memorandum will be shared with the RS/OFO, RS/OLE and RS/OPDRE. The DRD will evaluate the recommendations of the IRT within 30 calendar days after receipt of the IRT's memorandum and inform the RS/OFO, RS/OLE and RS/OPDRE of changes or corrections necessary to the Inspection Program. The DRD will document evaluation of the recommendations by signing and dating the IRT's memorandum. OFO will have the lead in implementing the changes to the inspection program as soon as practicable, including changes to the P&PD, in conjunction with appropriate support from OLE and OPDRE. The RS/OFO, RS/OLE and RS/OPDRE will document compliance with such changes within 30 calendar days of receipt, by sending memorandums to the DRD acknowledging that changes to the inspection policies and procedures will be implemented immediately.

- H. Action Plan Preparation and Evaluation: The action plan is prepared by the manager of the activity being reviewed and consists of both corrective actions and preventive actions. Corrective actions are those actions taken to correct the specific deficiency identified by the IRT. Preventive actions are those actions taken to preclude a recurrence of the type of deficiency identified by the IRT. The manager of the activity being reviewed always has the option to either comply with the procedure in the future or to revise the procedure to reflect the current method of operations.

The plan must specify in either case the following:

- (1) What specific actions are going to be taken.
- (2) Who will take the actions.
- (3) When the actions will be taken.
- (4) What records/documentation will exist to show that the actions have been taken.

The IRT prepares a memorandum to the manager of the activity being reviewed stating either that the plan is acceptable or the reason(s) why the plan is unacceptable. This memorandum is due within 15 working days of the receipt of the plan. If the plan is not acceptable, the memorandum will contain a new due date that is no more than 15 working days from the date of the memorandum.

If the plan is acceptable, the IRT schedules a follow-up review to verify that the actions have been taken and that they were effective.

- J. Follow-up Actions: When the IRT evaluates an action plan and finds it acceptable, the IRT prepares the memorandum to the manager of the activity

being reviewed and schedules a follow-up review. This review is conducted to verify that the actions identified in the plan have in fact taken place and that they have been effective in precluding a recurrence of the type of deficiency that was identified in the initial review.

The follow-up review should be scheduled long enough after the dates in the plan to ensure that the organization has had time to comply with the changes and that they are working effectively. If the IRT determines that the deficiency is not significant, the follow-up review may be scheduled to coincide with the next internal review.

If a follow-up review is scheduled before the next internal review and the IRT finds no deficiencies, this fact is documented in a memorandum to the manager of the activity being reviewed which closes out the deficiency.

If a follow-up review is scheduled before the next internal review and the IRT does find one or more deficiencies, the IRT prepares a memorandum to the manager of the activity being reviewed identifying the action plan associated with the previous deficiency as ineffective and requests a new plan within 15 working days. This plan is treated in the same fashion as a new plan.

If the IRT conducts another follow-up review and finds no deficiencies, this fact is documented in a memorandum to the manager of the activity being reviewed which closes out the deficiency. If one or more deficiencies still exist, the IRT prepares a memorandum to the supervisor of the manager of the activity being reviewed identifying the deficiency and stating that the manager has been unable to prevent the deficiency from recurring. A copy of all previous correspondence is attached and the supervisor is requested to submit an action plan with 15 working days. This cycle then repeats itself until the deficiency no longer exists.

K. Records: The DRD will maintain records for a period of 2 years for all internal reviews performed. The records will show:

- (1) The specific activity and location being reviewed.
- (2) The person(s) who performed the review.
- (3) The person(s) contacted during the review.
- (4) The date(s) of the review.
- (5) The specific deficiencies identified during the review.
- (6) The written notification of the review findings and request for action plans.

- (7) The action plans and their acceptance or rejection.
- (8) The follow-up actions taken to confirm the effectiveness of the action plans.
- (9) Additional information related to the review.

PACIFIC OCS REGION POLICIES AND PROCEDURES DOCUMENT

CHAPTER 9. OIL SPILL RESPONSE AND POLLUTION PREVENTION

INSPECTIONS, DRILLS AND TRAINING

1. Purpose: This chapter covers BOEMRE responsibilities and procedures involving oil spill response inspections, drills, training, and related contingency activities.
2. Responsibilities and Procedures:

- A. Responsibilities:

The RD is responsible for ensuring that a documented method for performing oil spill response drills, inspections, and training is in place and performed in accordance with applicable requirements.

The RS/OFO, via OSES personnel (Section Chief and Oil Spill Program Administrator) and in consultation with OLE, is responsible for:

- (1) Coordinating the Region's review and approval of pollution prevention programs and new responsibilities under the Oil Pollution Act of 1990 (OPA 90) for OCS oil and gas operations.
- (2) Coordinating Oil Spill Response Plan (OSRP) reviews with other government and affected State and County agencies to ensure consistency with established joint review and approval process and to ensure appropriate pollution prevention safeguards for the protection of the environment.
- (3) Developing and maintaining the Region's pollution prevention and response strategies and guidelines to ensure an effective and comprehensive program, and reviewing new pollution prevention and response technologies for incorporation into the Region's prevention and response strategies and guidelines.
- (4) Maintaining the TIMS computerized database, Events Component, for spills in the Region.
- (5) Maintaining the POCSR Emergency Notification Directive.
- (6) Receive Notifications of operator initiated drills and exercises. Coordinate POCSR personnel participation in drills and exercises.

- (7) Conduct an annual major unannounced oil spill drill which involves secondary response and mobilization of operator command center. The POCSR oil spill team will send personnel to monitor response at the platform(s) and the operator's off-site command center. All oil spill team members conducting the exercise will then analyze the results of the drill and a final evaluation will be made on the state of readiness relative to the approved plan for that facility.
- (8) Monitor operator's response to a spill response to ensure the protocols are followed in the BOEMRE approved OSRP and make recommendations for changes as appropriate.
- (9) Conduct inspections of oil spill cooperative response equipment and maintenance and response personnel training records based onshore and listed in the operator OSRPs.

The RS/OFO, via the California District, is responsible for:

- (1) Ensuring that oil spill response drills and inspections are scheduled and performed at designated intervals.
- (2) Classifying oil spills as minor or major and initiating major spill investigations while determining whether or not minor spills should be investigated.
- (3) Ensuring that the knowledge and skills of each District employee performing inspections are evaluated on an individual basis and that necessary training is provided depending on budget and scheduling constraints.
- (4) Ensuring that response equipment inspections are entered into the TIMS computerized data base, in the Inspections Component.
- (5) Evaluating on a continuing basis the performance of the oil spill response equipment listed in the operator's oil spill response plans (OSRP's) to ensure it meets the best available and safest technology guidelines and also recommending the replacement of equipment determined not to meet these guidelines.

B. Procedures for Announced and Unannounced Oil Spill Response Drills:

- (1) The initial deployment of primary oil spill response equipment (boom and skimmer) at a chosen facility varies depending on the operator's approved OSRP. Primary oil spill response equipment, used in the initial response