

Bureau of Safety & Environmental Enforcement (BSEE): Oil Spill Preparedness Division (OSPD)

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“To promote safety, protect the environment, and conserve resources offshore through vigorous regulatory oversight and enforcement.”



Some of what we do:



Oil Spill Preparedness Analysts



Review Oil Spill Response Plans



Support the National Response System



Audit Industry Spill Training and Exercises



Conduct Government Initiated Unannounced Exercises



Inspect Response Equipment



Regulatory Authority:

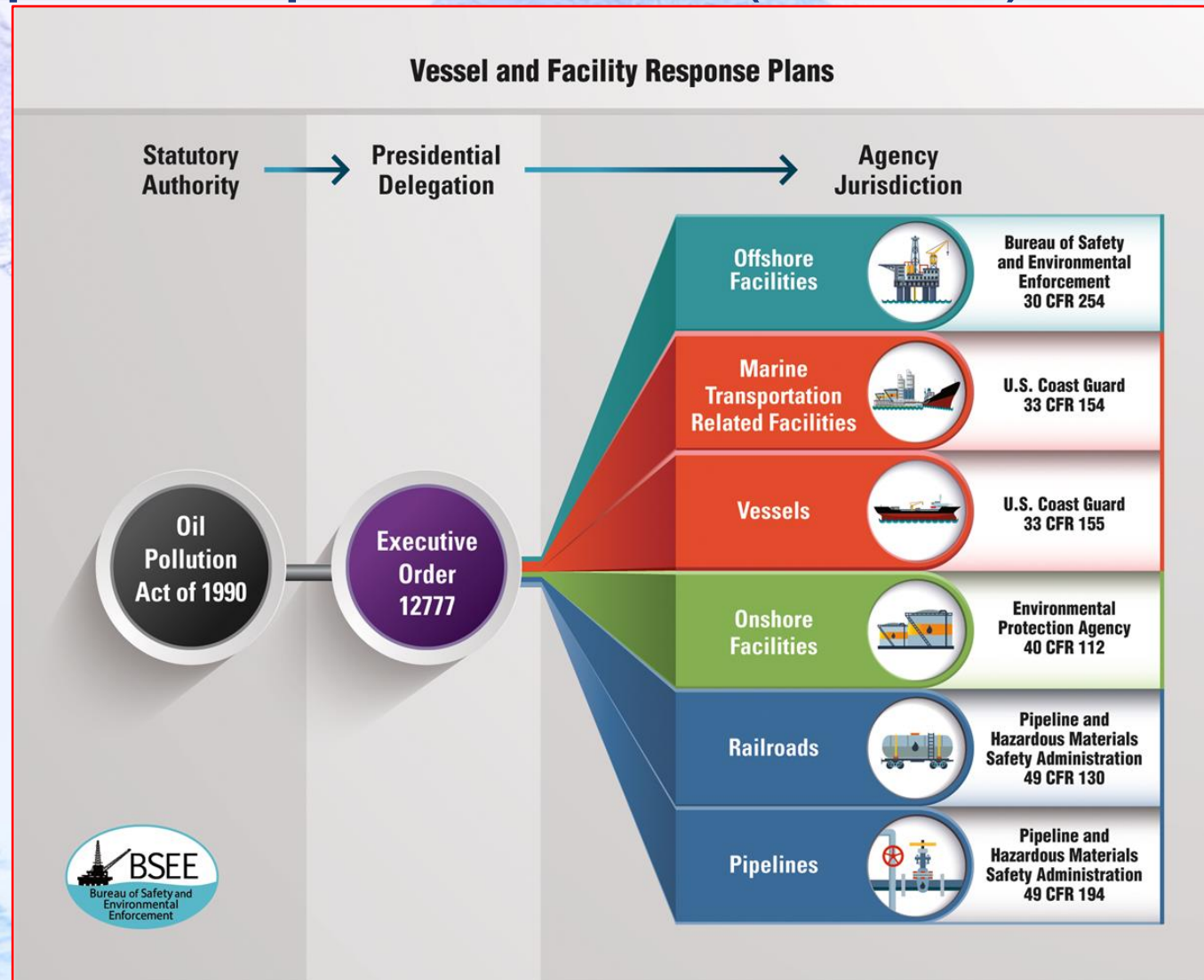


30 C.F.R. § 585.627 - What information and certifications must I submit with my COP to assist the BOEM in complying with NEPA and other relevant laws?

(c) You must submit your **oil spill response plan**, as required by **30 C.F.R. § 254**.



Oil Spill Response Plan (OSRP) Authority:



COP Terms & Conditions:

Oil Spill Response Plan (Planning).

- Before any component of the facilities that may handle or store oil is installed on the OCS, BSEE must review and accept the Lessee's OSRP.
- The OSRP must be consistent with the National Contingency Plan and appropriate Area Contingency Plan(s).
 - OSPD will contact the appropriate USCG District (WWM) office to review the OSRP as described in MOA OSC-03. WWM will engage DRM/DRAT for review for ACP consistency.
- In order to continue operating, the Lessee must operate in accordance with the OSRP accepted by BSEE.

Terms & Conditions (continued...)

The Lessee's OSRP must:

- Describe the **type and amounts of oil** on the facilities covered in the OSRP.
- Include **safety data sheets (SDS)** for any oils present on any facility in quantities equal to or greater than 100 gallons.

[MIDEL]
SAFETY INSIDE

MIDEL[®] 7131

Safety Data Sheet

March 2021 Page 1 of 5

1. Identification of the Substance/Mixture and of the Company/Undertaking	1.1 Product Identifier Material Name: MIDEL 7131. EU REACH No.: 01-2120104110-86-0000. 1.2 Relevant identified uses of the substance or mixture and uses advised against Product Use: Dielectric fluid. Uses advised against: None. 1.3 Details of the supplier of the substance or mixture Company: M&I Materials Ltd., Hibernia Way, Trafford Park, Manchester, M32 0ZD, UK. Telephone: +44 (0)161 854 5411. Emergency Telephone: +44 (0)161 854 5439. Email: midelitech@mimaterials.com.									
2. Hazards Identification	This product is not classified as hazardous and this document has been compiled for information purposes, in accordance regulation 1907/EC/2006, Annex II, as amended by Regulation (EU) No. 2015/630 and OSHA hazard communication guidelines. 2.1 Classification of the substance or mixture Regulation (EC) No 1272/2008 (CLP): Not classified. 2.2 Label elements Regulation (EC) No 1272/2008 (CLP): No symbol or signal word. 2.3 Other hazards None.									
3. Composition/Information on Ingredients	3 Substance CAS No.: 68424-31-7. Description: Fatty acids, C5-10 (linear and branched), mixed esters with pentaerythritol. Composition: <table border="1"><thead><tr><th>Constituent</th><th>CAS Number</th><th>Contents</th></tr></thead><tbody><tr><td>Fatty acid tetra esters</td><td>68424-31-7</td><td>>99.5%</td></tr><tr><td>Performance enhancing additives</td><td>Proprietary</td><td><0.5%</td></tr></tbody></table> <p>All constituents are listed on the TSCA Inventory. Additives used in this product are a trade secret, but do not lead to classification of the substance as hazardous.</p>	Constituent	CAS Number	Contents	Fatty acid tetra esters	68424-31-7	>99.5%	Performance enhancing additives	Proprietary	<0.5%
Constituent	CAS Number	Contents								
Fatty acid tetra esters	68424-31-7	>99.5%								
Performance enhancing additives	Proprietary	<0.5%								
4. First Aid Measures	4.1 Description of first aid measures Inhalation: None envisaged due to the low vapour pressure of the substance. Skin: Wash with soap and water. Obtain medical attention if irritation develops. Eyes: Irrigate with copious amounts of water. Obtain medical attention if irritation develops. Ingestion: Do not induce vomiting, obtain medical attention. 4.2 Most important symptoms and effects, both acute and delayed No adverse effects expected.									

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Terms & Conditions (continued...)

The Lessee's OSRP must:

Include the **worst-case discharge (WCD)** volume for each type of facility covered in the plan.

- The “Worst-Case Discharge Volume” is the highest cumulative volume of oil and all other oil-based substances contained on a single facility, such as an electrical service platform (ESP) or wind turbine generator (WTG).

Terms & Conditions (continued...)

The Lessee's OSRP must:

Identify a trained **Qualified Individual (QI)** and an alternate who have full authority to implement removal actions and ensure immediate notifications of appropriate government officials and response personnel.

- Provide these individuals' 24-hour contact information, including phone numbers and e-mail addresses.

OSRPs that cover the ESP(s) must identify a trained **Incident Management Team (IMT)** and provide 24-hour contact information for each member, including phone numbers and e-mail addresses.

- If a contract has been established with an IMT, evidence of such a contract must be provided in the OSRP.

Terms & Conditions (continued...)

The Lessee's OSRP must:

Describe the procedures for internal and external spill notifications.

- Notification procedures must include the 24-hour contact information for:
 - Federal, state, and local regulatory agencies that must be notified when a spill occurs, including but not limited to the National Response Center.
 - OSROs and SROTs that are available to respond.
 - Other response organizations and subject matter experts that the Lessee will rely on for the response.



The screenshot shows the top portion of the United States Coast Guard National Response Center website. On the left is the Coast Guard emblem. To its right, the text reads "United States Coast Guard" and "National Response Center". Below this is a dark blue navigation bar with the links "NRC HOME", "CONTACT US", and "FEATURED LINKS". Underneath the navigation bar is a "Skip Navigation" link. The main content area features a large American flag background. In the center, it says "Welcome to the National Response Center". On the right side of the main content area is the "NTAS" logo, which stands for National Terrorism Advisory System, with the text "NO ACTIVE ALERTS" below it. At the bottom of the main content area, a message states: "Anyone witnessing an oil spill, chemical release or maritime security incident should call the NRC hotline at 1-800-424-8802."

Terms & Conditions (continued...)

The Lessee's OSRP must:

Describe the **different discharge scenarios** that could occur from the Lessee's facilities and the **mitigation procedures** by which the operator and any listed/contracted OSROs (if required) would respond to such discharges.

- The mitigation procedures must address responding to both smaller spills (with slow, low-volume leakage) and larger spills to include the largest WCD.



Terms & Conditions (continued...)

The Lessee's OSRP covering the ESP(s) must:

Include a spill trajectory analysis which:

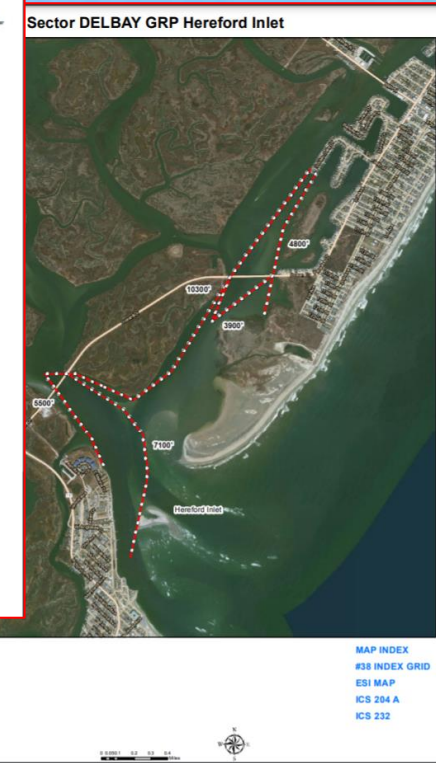
- Is based on the WCD volume from the ESP that contains highest total volume of oil and oil-based substances.
 - If all the ESPs contain the same volume of oil and oil-based substances, the trajectory analysis is based on the ESP that is closest to shore.
- Is conducted for the longest period of time that the discharged oil would reasonably be expected to persist on the water's surface or 14 calendar days, whichever is shorter.
- Identifies the probabilities for oiling on the water's surface and on shorelines, and minimum travel times for the transport of oil over the duration of the model simulation.

Terms & Conditions (continued...)

The Lessee's OSRP must:

Include a concise list of the sensitive resources that are located near the Lessee's offshore facility and could be oiled by a spill.

- In lieu of listing sensitive resources, the Lessee may provide hyperlinks to corresponding Environmental Sensitivity Index Maps and Geographic Response Strategies.



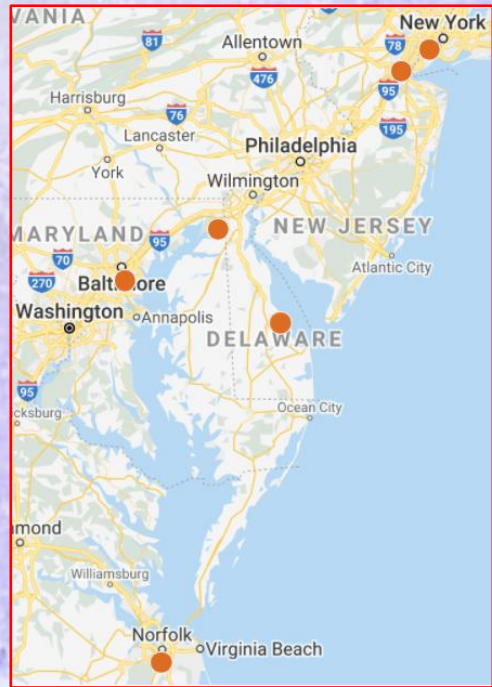
Terms & Conditions (continued...)

The Lessee's OSRP must:

Include a list of OSROs and SROT's that are available to respond to the WCD.

- If the OSRP only covers WTGs, the Lessee may provide a **Letter of Intent (LOI)** from each OSRO and SROT acknowledging that they have agreed to be listed in the Lessee's OSRP.
- If the OSRP covers the ESP(s), the Lessee is required to ensure the availability of OSRO and SROT resources through a contract or membership agreement.
 - If a contract has been established with an OSRO and SROT, evidence of such contracts or membership agreements must be provided in the OSRP.

The OSRP must also include a map that shows equipment storage sites and staging areas.



Terms & Conditions (continued...)

The Lessee's OSRP must:

Include a description of the annual QI, IMT, OSRO, and SROT trainings.

- The OSRP must provide the most recent dates of applicable trainings.
- Training records must be maintained and retained for 3 years and provided to BSEE upon request.



Terms & Conditions (continued...)

The Lessee's OSRP must:

Contain a triennial exercise plan for review and concurrence by BSEE.

- The Lessee must conduct an annual scenario-based notification exercise, an annual scenario-based IMT tabletop exercise, and, during the triennial exercise period, at least one functional exercise.
 - If the OSRP includes an OSRO and SROT contract, an annual deployment exercise of the Lessee's contracted response equipment and personnel is required.
- BSEE may evaluate the results of the exercises and advise the Lessee of any needed changes in response equipment, procedures, tactics, or strategies.
- BSEE may periodically initiate unannounced exercises to test the Lessee's spill preparedness and response capabilities.

Terms & Conditions (continued...)

OSRPs that cover the ESP(s) must:

- Include a list or a hyperlink to a list of the oil spill response equipment inventory that is available to the Lessee through OSRO contracts and identify the location of the equipment depots.

The Lessee's must:

Ensure that contracted response equipment is maintained in a proper operating condition.

- Further ensure that all maintenance, modification, and repair records are kept for a minimum of 3 years.
- Provide these records to BSEE upon request.
- Provide BSEE with physical access to the equipment storage depots.
- Perform functional testing of the response equipment upon BSEE's request.

BSEE may require maintenance, modifications, or repairs to response equipment or require the Lessee to remove response equipment from the OSRP if it does not operate in accordance with its intended purpose.

Terms & Conditions (continued...)

OSRP Maintenance:

The Lessee must review and update the entire OSRP at least once every 3 years, starting from the date the OSRP was initially accepted.

- The Lessee must send a written notification to BSEE upon completion of this review and submit any updates for concurrence.

The Lessee must revise its OSRP within 15 calendar days after:

- Their response capability is significantly reduced.
- Their WCD is significantly increased.
- They remove a contracted IMT, OSRO, or SROT.
- A significant change occurs in the applicable area contingency plans.

BSEE may require changes to the Lessee's OSRP if they determine that the OSRP is outdated or inadequate based on information obtained during the review process, exercises or actual spill responses, or based on other relevant information.

Any Questions?

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