SUGGESTED PROCEDURE FOR DEVELOPMENT OF SPILL PREVENTION CONTROL AND COUNTERMEASURE PLANS
(To Assist Conformance to Requirements of Title 40, Code of Federal Regulations, Part 112)

INTRODUCTION

The Federal Water Pollution Control Act Amendments Of 1972 require the Administrator of the Environmental Protection Agency (EPA), with other federal, state, and interstate agencies, to enter into programs designed to prevent, reduce, or eliminate pollution of the navigable waters of the United States. The EPA published regulations for the prevention of pollution of waters of the United States by oil emanating from non-transportation related onshore and offshore facilities. The regulations are identified as Title 40, Code of Federal Regulations, Part 112 (40 CFR Part 112), "Oil Pollution Prevention - Non-transportation Related Onshore and Offshore Facilities", and became effective on January 10, 1974.

These regulations require the preparation and implementation of a Spill Prevention Control and Countermeasure (SPCC) Plan for all non-transportation related facilities (onshore and offshore) which have discharged or could reasonably be expected to discharge oil into the navigable waters of the United States or the adjoining shorelines. The regulations require that owners or operators (including contractor operators) of mobile drilling and workover rigs must prepare and implement SPCC Plans for each rig. Owners or operators of onshore drilling and workover rigs should review the regulations and comply with requirements applicable to their specific operations.

The objective of these regulations is to prevent the discharge of oil in harmful quantities into the navigable waters of the United States or adjoining shorelines. The accomplishment of this objective requires an assessment of each facility for the possibility of any such discharge of oil. Where such potential exists, the regulations urge that (a) employees be adequately trained to reduce the number of human errors that often cause spills; (b) inspection procedures implemented; (c) when appropriate, pollution prevention equipment be installed and maintained; and (d) secondary containment, if practicable, be provided to contain any oil that may be spilled.

GENERAL DISCUSSION
(Administrative Section of 40 CFR Part 112; Section 112.1-112.6)

APPLICABILITY

Except for facilities listed below, a SPCC Plan must be prepared by the owner or operator of onshore and offshore non-transportation related facility engaged in drilling, producing, gathering, storing, processing refining, transferring, distributing, and consuming oil and oil products.
The exceptions to the requirement are as follows:

(1) Equipment or operations of vessels or facilities which are subject to authority and control of the U.S. Department of Transportation.

(2) Facilities having a total above-ground storage capacity of 1,320 gallons or less of oil, provided to single container has a capacity in excess of 660 gallons.

(3) Facilities having a total storage capacity of 42,000 gallons or less and with such total storage capacity buried underground.

(4) Facilities which, due to their location, could not reasonable be expected to discharge oil into or upon the navigable waters of the United States or adjoining shorelines.

Non-transportation related facilities include, but are not limited to, oil production lease facilities, mobile or portable drilling or workover rigs operating in fixed mode, portable fueling facilities, and gas processing plants.

Individual SPCC Plans must be prepared by the owner or operator of each mobile or portable drilling or workover rig. These plans will apply from location to location and need not be redone each time the big rig moves.

APPLICABILITY
Continued

In order to determine which facilities will require SPCC Plans, the owner or operator must make a determination of those facilities from which a discharge could "reasonably be expected" to get into navigable waters or upon adjoining shorelines. Obviously, if a facility is far removed from navigable waters the chance for a discharge at that location getting into the navigable waters may be very remote. All facilities should be examined critically to determine if, in the judgment of the owner or operator, a discharge at that location could logically be expected to get into such water. Among the factors the owner or operator should consider in making such determination are:

(1) Prior spill history;
(2) Location (proximity to navigable waters);
(3) Potential size of discharge
(4) Type of soil and terrain; and
(5) Frequency and amount of rainfall

The phrase "reasonably be expected" means that the exception is logical, rational, sensible, justifiable, credible, plausible, etc.

The term "navigable waters" is defined in the regulations (40 CFR Part 112) in Section 112.2 (k). Generally speaking, every body of water or continuous stream should be considered navigable. The definition includes the following:

(1) Waters that are navigable in fact;
(2) Waters declared navigable by a Federal Agency or court;
(3) Tributaries of navigable waters;
(4) Interstate waters; and
(5) Interstate lakes, rivers, and streams
    (a) From which fish or shellfish are taken and sold in interstate commerce, or
    (b) Which are utilized by interstate travelers for recreational or other purposes.

REQUIREMENTS FOR PREPARATION AND IMPLEMENTATION OF SPCC PLANS

SPCC Plans are to be prepared and maintained at an appropriate place near or at the facility. Operators are to implement the SPCC Plans as soon as possible after preparation, but no later than one year after date of first operation.

CERTIFICATION

Each SPCC Plan must be reviewed and certified by a Registered Professional Engineer. The engineer must be familiar with the provisions of 40 CFR, Part 112 and must have examined the facility and attest that the Plan has been prepared in accordance with good engineering practices. It is not necessary by this regulation that the engineer be registered in the state in which the facility is located. However, for the protection of the Registered Professional Engineer local-licensing requirements should be ascertained.

PLAN AVAILABILITY

The operator of a facility for which a SPCC Plan is required must maintain a complete copy of the Plan at the facility, if manned at least 8 hours per day, or at the nearest field office if unmanned. The Plan must be made available to EPA personnel for on-site review anytime during normal working hours.

AMENDENTS

The owner or operator is required to amend the Plan for the following reasons:

(1) When required by the EPA after review of the Plan, submitted because of a Spill event;
(2) Whenever there is a change in facility design, construction, operations, or maintenance which materially affect the potential for an oil spill; or
(3) The owner or operator is required to review each SPCC Plan at least once every three years, and an amendment is required if such review indicates mores effective control and prevention technology will significantly reduce the likelihood of a spill event (and if such technology has been field proven)

The operator must submit the SPCC Plan with any amendments to EPA and to the appropriate state agencies whenever a facility has:

(1) Discharged more than 1,000 U.S. gallons (approximately 24 barrels) into in navigable waters in a single spill event; or
(2) Discharged oil in harmful quantities, as defined in 40 CFR, Part 110, into navigable waters in two reportable spill events within any 12 month period.

AMENDMENTS
Continued

Within 60 days of the occurrence of either of these two conditions the operator must submit to the EPA Regional Administrator the following:

(1) Name of the facility.
(2) Name of the owner or operator of the facility.
(3) Location of the facility.
(4) Date of initial facility operation.
(5) Maximum storage or handling capacity of the facility.
(6) Description of the facility, including maps, flow diagrams, and topographical maps.
(7) A complete copy of the SPCC Plan with any amendments.
(8) The cause of such a spill, including a failure analysis of the system or subsystem in which the failure occurred. Lease production facilities may be divided into drilling production, and gathering systems for identification purposes in reporting to EPA. These major systems can be broken down into various components or subsystems. The failure analysis is to examine and explain the reason for the failure resulting in the spill event. The analysis should be explicit, definitive, and not general. For instance, it would be inadequate to report simply the cause of a spill was the failure of a storage tank. The failure analysis should indicate in some detail the nature of the failure that caused the spill.
(9) The corrective actions and/or countermeasures taken, including an adequate description of equipment repairs and/or replacements.
(10) Additional preventative measures taken or contemplated to minimize the possibility of recurrence.
(11) Such other information as the EPA Regional Administrator may require.

AMENDMENTS
Continued

A complete copy of all information provided to EPA must also be sent at the same time to the state agency in charge of water pollution control activities. The state agency may review the information and make recommendations to EPA to prevent and to contain discharges of oil from the facility. The EPA will review the information and any recommendations made by the state agency and may require the operator to amend the SPCC Plan. When EPA proposes to require an amendment to the Plan, the operator will be notified by certified mail or by personal delivery. The EPA will specify the terms of such amendment. Within 30 days from receipt of this notice, the operator may submit written information, views and arguments on the proposed amendment requirement. After considering all material presented, EPA will notify the operator of the amendment required or will rescind the notice. The amendment required becomes a part of the SPCC Plan 30 days after such notice, unless the operator appeals, and the operator must implement the amendment as soon as possible but not later than six months after the amendment becomes a part of the plan.

All SPCC Plan amendments, except those proposed by the EPA Regional Administrator, must be certified by a Registered Professional Engineer.

CIVIL PENALTIES

Owners or operators of facilities who violate the requirements of a regulation relating to the preparation, implementations and amendments to SPCC Plans are liable for a civil penalty. The EPA Regional Administrator may assess and compromise such civil penalty. No penalty will be assessed until the owner or operator has been given notice and an opportunity for hearing.

PART 1 INSTRUCTIONS
GENERAL INFORMATION

1. Enter a descriptive name for the facility to be included in the Plan. The name could be the rig name if all operations are included.

2. Classify the facility as: (a) Onshore drilling facility or (b) Offshore drilling (or workover) facility.

3. The facility location should include the county (parish) and state and the distance and direction from a nearby town. For a mobile drilling rig the location should be variable.

4. Enter the name of the person (corporation, company, partnership, individual, etc.) responsible for the facility operations and the address to which correspondence regarding the facility should be sent.

5. Enter the name and title of the designated person who is accountable for oil spill prevention and who reports to line management. In various situations, this person could be a company employee such as a superintendent or foreman, or an owner or operators agent with similar responsibilities and authority.

6. If a facility has experienced one or more reportable oil spills within the 12 months prior to the effective date of the regulation (January 10, 1974), a written description of each such spill, the corrective action taken, and the plans for preventing recurrence must be included in the plan.

The overall Plan must have full approval of management at a level with authority to commit the necessary resources.

A Registered Professional Engineer must certify that he has reviewed the Plan, has examined the facility, is familiar with the provisions of the regulations (40 CFR Part 112), and can attest that the SPCC Plan has been prepared in accordance with good engineering practices.

GENERAL INFORMATION
Continued

Where experience indicates a reasonable potential for equipment failure, the Plan for a facility should include a prediction of the direction, rate of flow, and total quantity of oil which could be discharged as a result of each major type of failure of each major type of failure. As a result of the prediction, appropriate containment and/or diversionary structures or equipment to prevent discharge oil from reaching navigable water should be provided, when practicable. In some cases, a narrative description of flow and the containment method will be sufficient.

When it is determined that the installation of structures or equipment to prevent discharged oil from reaching navigable waters is not practicable for the facility, the owner or operator would explain why and provide the following:

(1) A strong spill contingency plan.
(2) A written commitment of manpower, equipment, and materials required to expeditiously control and remove and harmful quantities of oil discharged.

The regulations (40 CFR Part 112) state that the Plan should provide for inspections of some operations. The inspections should be in accordance with written procedures developed for the facility by the owner or operator. These written procedures and a record of the inspections signed by the appropriate supervisor or inspector should be made a part of the SPCC Plan. The written procedures for the inspections should be prepared for the individual facility by the owner or operator and should be attached to the appropriate inspection record.

Owners or operators of a facility are responsible under the guidelines for properly instructing their personnel in (A) the operation and maintenance of equipment to prevent the discharge of oil to navigable water and (B) the applicable pollution control laws, rules, and regulations affecting the facility. Owners or operators should schedule and conduct spill prevention briefings for their operating personnel at intervals frequent enough to assure adequate understanding of the SPCC Plan. These briefings should highlight and describe known spill events or failures, malfunctioning components, and recently developed precautionary measures.

PART II, ALTERNATE A INSTRUCTIONS
ONSHORE DRILLING FACILITY

FACILITY DRAINAGE

Diked storage area should have manual valves, manually activated pumps or ejectors, or other acceptable alternatives to drain or empty retained storm water. The condition of the water should be checked before drainage to ensure that no oil is discharge.

Drainage systems for undiked areas should flow, if possible, into either (a) ponds, lagoons, or catchment basins designed to retain oil or return it to the facility, or (b) a diversion system at the final discharge of all in-plant ditches that could contain an uncontrolled spill and return the oil to the plant. Where drainage waters are treated in more than one treatment unit, natural hydraulic flow should be used. If pump transfer is used, two "lift" pumps should be provided. If the treatment is continuous, one of the pumps should be permanently installed.

Drainage of rain water from dikes into a storm drain or into an effluent discharge which empties into an open watercourse, lake or pond may bypass the treatment system if (a) the bypass valve is normally sealed closed, (b) the effluent is inspected to ensure compliance with applicable water quality standards and that no harmful discharge will occur, (c) the opening and resealing of the bypass valve is conducted under responsible supervision, and (d) adequate records are kept of such events.

SECURITY

All facilities should use as a security measure, fences and locked and/or guarded gates when the facility is not in use or is unattended. Other measures should include locked valves on tanks if the valves could permit a spill, secures or electrically isolated starter controls on pumps, capped or blindflanged loading/unloading connections of oil pipelines when not in service, and lighting adequate to permit surveillance of the facility. The lighting around the facility should be discussed in the SPCC Plan.

PART II, ALTERNATE B INSTRUCTIONS
ONSHORE DRILLING FACILITY

FACILITY DRAINAGE

Diked storage areas should have manual valves or other acceptable alternative on drains. The condition of retained storm water for the presence of oil should be determined before drainage.

All drains from tank battery structures should be closed and sealed except during drainage of rain water.

Drainage of rain water from dikes into a storm drain or into an effluent discharge which empties into an open watercourse, lake or pond may bypass the facility treatment system if (a) the bypass valve is normally sealed closed, (b) the effluent is inspected to ensure compliance with applicable water quality standards and that no harmful discharge will occur, (c) the opening and resealing of the bypass valve is conducted under responsible supervision, and (d) adequate records are kept of such events. Field drainage ditches, road ditches, and oil traps or skimmers should be inspected at regular intervals for accumulations oil should be returned to storage or disposed of by an approved method.

BULK STORAGE TANKS

Oil storage tank construction and material should be compatible with oil stored and the storage conditions such as pressure, temperature, etc.

Secondary containment should be provided for the capacity of the largest single tank plus sufficient allowance for precipitation. Dikes, curbs, and pits are commonly used for this purpose. Dikes should be sufficiently impervious to contain oil. In considering the additional volume to be provide to take care of precipitation, the determination should consider the greatest amount of rainfall that may be reasonably expected occur in a storm. An alternate system could consists of a drainage trench arranged so a spill could terminate and be contained in a catchment basin.

BULK STORAGE TANKS
Continued

Tanks should be visually examined by a competent person for condition and need for maintenance on a scheduled, periodic basis. Such inspection should include he foundation and supports of tanks that are above the surface of the ground. These examinations should be more comprehensive than the observations made by pumpers in their routine activities.

Both new and old tank battery installations should be property designed and equipped to prevent the accidental discharged of oil. Fail-safe engineering features which should be considered in construction or modification include adequate sizing of tanks, use of overflow equalizing lines, adequate vacuum protection, and the use of high-liquid-level sensors when a computer production control systems is used.

OIL DRILLING AND WORKOVER FACILITIES

During drilling or workover operations, the production facility operator should ascertain that a blowout preventer assembly and well controls system is installed that will be capable of controlling any wellhead pressure anticipated. [The drilling or workover rig owner or operator (contractor) must prepare and implement a SPCC Plan that will pertain to the drilling or workover rig.] The blowout preventer installation should be in accordance with the requirements of state and other applicable rules and regulations. Th degree of well control system redundancy and “fail-safe” valving design should vary with hazard exposure and probable consequences of failure.

PART II, ALTERNATE C INSTRUCTIONS
OFFSHORE OIL DRILLING, PRODUCTION, OR WORKOVER FACILITY

This form may be used in preparation of SPCC Plans for offshore production facilities and drilling or workover rigs used in offshore operations. The form was designed specifically for producing facilities but is also thought to be adequate for application to offshore drilling and workover rigs.

FACILITY DRAINAGE

All sources of drips and small spillages of oil on offshore platforms should be protected with drains and drip pans to catch the oil before it can enter the water. Drip pans should be observed at regular intervals and emptied when necessary to make sure they do not fill to overflowing. Drains should empty into sumps which should be emptied as often as necessary to prevent overflowing.

SUMP SYSTEMS

The sumps provided as overflow and spill collection equipment should be large enough to allow protection against accidental spillages. Some adequate alternate means should be provided for removing the liquid caught in the sumps in case the primary sump pump becomes inoperative. The pump and start-up device should be inspected and tested at regular internals to ensure they are functional at all times.

SEPARATOR AND TREATER DUMP VALVES

If the predominant mode of failure of dump valves used on separators and treaters at an offshore facility is in the closed position, the potential for pollution is not great if the pressure relief line extends to surge tank or scrubber which would catch any fluid overflowing through the relief line.

TANKS

All tanks should be equipped with protective devices to reduce the potential for overflowing or rupturing and, thus, discharging oil upon the surface of the water. Atmospheric storage or surge tanks should be equipped with high-liquid-level sensors or other acceptable alternatives to prevent spills, and pressure tanks should have high and low pressure sensors to activate alarms and/or control flow or other acceptable alternatives to prevent spills. Tanks should be adequately protected internally and externally from corrosion, as required to prevent leakage or spillage.

POLLUTION PREVENTION EQUIPMENT AND SYSTEMS

Inspection and testing procedures for pollution prevention equipment and systems should be developed and a copy of such procedures maintained at the facility. Such equipment as high and low level sensors, high and low pressure sensors, etc. should be inspected and tested at periodic intervals.

WELL CONTROIL SYSTEMS AND EQUIPMENT

Producing Wells - Type of surface and subsurface shut-in valves and devices in use at the facility should be described as to method of operation and control.

Drilling and Workover Operations - During drilling or workover operations, a blowout preventer assembly and well control system should be installed that is capable of controlling any wellhead pressure anticipated. Casing and blowout preventer installations should be in accordance with requirements of applicable rules and regulations.

The degree of well control systems redundancy and “fail-safe” valving design should vary with hazard exposure and probable consequences of failure.

WRITTEN INSTRUCTIONS FOR CONTRACTORS

The regulations states that in order that there will be no misunderstanding of the joint and separate duties and obligations to perform work in a safe and pollution-free manner, written instructions should be prepared by the owner or operator for contractors and subcontractors to follow whenever contract activities include servicing a well or systems appurtenant to a well or pressure vessel. Such instructions and procedures should be maintained at the facility. Under certain circumstances, contractor activities may require intervention by an authorized representative of the owner or operator to prevent a spill event. (Appropriate legal counsel should be consulted regarding implementation of this section.)

FLOWLINES

1. All headers should be equipped with check valves on individual flowlines.

2. If the shut-in wellhead pressure is greater than the working pressure of the flowline from the well and/or header valves associated with that individual flowline, the flowline should be equipped with a pressure sensing device and shut-in valve at the wellhead unless a pressure relief system is provided.

PIPELINES

1. All pipelines appurtenant to the facility should be protected against corrosion. Methods of providing such protection should be described.

2. Submarine pipelines associated with the facility should be adequately protected against environmental stresses and other activities such and fishing operations.

3. Submarine pipelines should be inspected for failures periodically. A documented record of such inspections should be maintained at the facility.

SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN

PART I
GENERAL INFORMATION

1. Name of facility _____
2. Type of facility _____
3. Location of facility _____
   _____
   _____
4. Name and address of owner or operator:
   Name_____
   Address_____
   _____
   _____

5. Designated person accountable for oil spill prevention at facility:
   Name and Title:_____
6. Facility experienced a reportable oil spill event during the twelve months prior to Jan. 10, 1974 (effective date of 40 CFR, Part 112.)

_____

MANAGEMENT APPROVAL

This SPCC Plan will be implemented as herein described.

Signature _____
Name _____
Title _____
_____

CERTIFICATION

I hereby certify that I have examined the facility, and being familiar with the provisions of 40 CFR, Part 112, attest that this SPCC Plan has been prepared in accordance with good engineering practices.

_____
Printed Name of Registered Professional Engineer

_____
Signature of Registered Professional Engineer

(Seal)

Date_____ Registration No._____State_____

PART I
GENERAL INFORMATION
(Response to statements should be: Yes, No, or NA)

7. Containment or diversionary structures or equipment to prevent oil from reaching navigable waters are practicable. _____

8. INSPECTIONS AND RECORDS

A. The required inspections follow written procedures. _____

B. The written procedures and a record of inspections, signed by the appropriate supervisor or inspector, are attached. _____

Discussion: _____

_____

_____

_____

9. PERSONNEL TRAINING AND SPILL PREVENTION PROCEDURES

A. Personnel are properly instructing in the following:

(1) Operation and Maintenance of equipment to prevent oil discharges and _____

(2) Applicable pollution control laws, rules and regulations. _____

Describe procedures employed for instruction: _____

_____

_____

_____

_____

B. Scheduled prevention briefings for the operating personnel are conducted frequently enough to assure adequate understanding of the SPCC Plan. _____

Describe briefing program: _____

_____

_____

_____

_____

Name of facility: _____

Operator: _____

PART II, ALTERNATE A
DESIGN AND OPERATING INFORMATION
ONSHORE FACILITY

A. FACILITY DRAINAGE

1. Drainage diked storage areas is controlled as follows (including operating description of valves, pumps, ejectors, etc. (Note: Flapper-type valves should not be used) : _____
_____
_____
_____
_____
_____
_____
_____
_____

2. Drainage from undiked areas is controlled as follows (including description of ponds, lagoons, or catchment basins and methods of retaining and returning oil to facility:_____
_____
_____
_____
_____
_____
_____
_____
_____

3. The procedure for supervising the drainage of rain water from secondary containment into a storm drain or an open watercourse is as follows (including description of (a) inspection for pollutants, and (b) method of valve security).
_____
_____
_____
_____
_____
_____
_____

Name of facility: _____
Operator: _____

PART II, ALTERNATE A
DESIGN AND OPERATING INFORMATION
ONSHORE FACILITY

(Response to statements should be Yes, No, or NA)

B. SECURITY

1. Facility handling, processing or storing oil are fenced. _____
2. Entrance gates are locked and/or guarded when the plant is unattended or not in production. _____
3. Any valves which permit direct outward flow of a tank's contents are locked closed when in a non-operating or standby status. _____
4. Starter controls on all oil pumps in non-operating or Standby status are:
   (a) locked in the off position; _____
   (b) located at site accessible only to authorized personnel. _____

5. Discussion of items 1 through 4 as appropriate: _____
   _____
   _____
   _____
   _____
   _____
   _____
   _____

6. Discussion of the lighting around the facility: _____
   _____
   _____
   _____
   _____
   _____
   _____
   _____
   _____

Name of facility: _____
Operator: _____

PART II, ALTERNATE B
DESIGN AND OPERATING INFORMATION
ONSHORE FACILITY

(Response to statements should be Yes, No, or NA)

A. FACILITY DRAINAGE

1. Drainage from diked storage areas is controlled as follows (include operating description of valves, pumps, ejectors, etc.):_____
_____
_____
_____
_____

2. The procedure for supervising the drainage of rain water from secondary containment into a storm drain or an open watercourse is as follows (include description of (a) inspection for pollutants, and (b) method of valving security)._____
_____
_____
_____

3. Field drainage ditches, road ditches, and oil traps, sumps, or skimmers, if such exist, are inspected at regularly scheduled intervals for accumulations of oil. _____
_____
_____
_____

B. BULK STORAGE TANKS

1. Describe tank design, materials of construction, and fail safe engineering features: _____
_____
_____
_____

Name of facility: _____
Operator: _____

PART II, ALTERNATE B
DESIGN AND OPERATING INFORMATION
ONSHORE FACILITY

(Response to statements should be Yes, No or NA)

2. Describe secondary containment design, construction materials, and volume: _____
_____
_____
_____
_____
_____
_____
_____
_____

3. Describe tank examination methods and procedures: _____
_____
_____
_____
_____
_____
_____
_____

Name of Facility: _____
Operator: _____

PART II, ALTERNATE C
DESIGN AND OPERATING INFORMATION
OFFSHORE OIL DRILLING OR WORKOVER FACILITY

(Response to statements should be Yes, No or NA)

A. FACILITY DRAINAGE

1. Oil drainage and collection equipment is used to catch small oil leakage around pumps, glands, valves, flanges, expansion joints, hoses, drain lines, separators, treaters, tanks, etc. _____
2. Drains direct all oil to a central sump or equivalent. _____
3. Where drains and sumps are not practicable, oil collection equipment is emptied as often as necessary to prevent overflow. _____
   Discuss frequency of surveillance and removal of oil from collection equipment: _____
   _____
   _____
   _____
   _____
   _____

B. SUMP SYSTEM

A sump system is used at this facility (if yes, complete 1 and 2 below)

1. Describe operation of sump and drain liquid removal system:
   _____
   _____
   _____
   _____
   _____

2. Describe preventative maintenance inspection, test program, and record keeping: _____
   _____
   _____
   _____
   _____
   _____
   _____

Name of Facility: _____
Operator:_____

PART II, ALTERNATE C
DESIGN AND OPERATING INFORMATION
OFFSHORE OIL DRILLING OR WORKOVER FACILITY

(Response to statements should be Yes, No or NA)

C. SEPARATOR AND TREATER DUMP VALVES

In areas where pollution risk is high as a result of dump valve failure is the predominant mode of failure in the closed position? _____

If YES, Describe safety equipment and procedures used to prevent oil discharges to the water when dump valve failure occurs:

_____
_____
_____
_____
_____

D. TANKS

Describe equipment used to prevent oil discharges (include discussion of corrosion protection measures): _____

_____
_____
_____
_____

E. POLLUTION PREVENTION EQUIPMENT AND SYSTEMS

Written inspection and testing procedures for pollution prevention equipment and systems are shown on Attachment #2.

F. WELL CONTROL SYSTEMS AND EQUIPMENT

1. Producing Wells. Types of surface and subsurface shut-in valves and and devices utilized at this facility are described as to the method of operation and control on Attachment #3.
2. Drilling and Workover Operations. A blowout preventer (BOP) assembly and well control system is installed before drilling below any casing string and, as required during workover operations. _____

Name of Facility: _____
Operator: _____

PART II, ALTERNATE C
DESIGN AND OPERATING INFORMATION
OFFSHORE OIL DRILLING OR WORKOVER FACILITY

(Response to statement should be: Yes, No or NA)

2. The BOP assembly is capable of controlling any expected wellhead pressure. _____
3. Casing and BOP installations conform to applicable rules and regulations. _____

G. WRITTEN INSTRUCTIONS FOR CONTRACTORS

1. Written instructions discussing duties and obligations to prevent pollution are prepared for contractors servicing a well or systems appurtenant to a well or pressure vessels. _____
2. These instructions are maintained at the offshore facility. _____
3. An authorized representative of the owner or operators is present under certain circumstances and conditions to intervene when necessary to intervene when necessary to prevent a spill event. _____

H. FLOWLINES

1. All headers have check valves on individual flowlines. _____
2. Where the shut-in well pressure is greater than the working pressure of the flowline, manifold valves, and flowline header valves, the flowline shall have a high pressure sensing device and shut-in valve at the wellhead to prevent over pressuring (unless a pressure relief system is provided). _____

I. PIPELINES

1. Describe corrosion protection measures for pipelines within the facility:

_____
_____
_____

2. Submarine pipelines connected to the facility are adequately protected against environmental stresses and fishing operations.
3. Described submarine pipeline inspection-for-failure procedures and record keeping:

_____
_____
_____

Name of Facility: _____
Operator: _____

SPCC PLAN, ATTACHMENT #1
OIL SPILL CONTINGENCY PLANS AND
WRITTEN COMMITMENT OF MANPOWER, EQUIPMENT, AND MATERIALS

Secondary containment or diversionary structures are impracticable for this facility for the following reasons (attach additional pages if necessary).

	YES
A strong oil spill contingency is attached.	_____
A written commitment of manpower, equipment, and materials is attached.	_____

Name of Facility: _____

Operator: _____

SPCC PLAN, ATTACHMENT # 3
OFFSHORE OIL DRILLING OR WORKOVER FACILITY
WELL CONTROL SYSTEMS AND EQUIPMENT

List type(s) of surface and subsurface well shut-in valves and devices used to maintain control of wells, showing (a) method of activation and control, and (b) description:

Item	Method of Activation and Control	Description

Name of Facility: _____

Operator: _____

SPCC PLAN, ATTACHMENT # 2
OFFSHORE OIL DRILLING OR WORKOVER FACILITY
POLLUTION PREVENTION EQUIPMENT AND SYSTEMS

POLLUTION PREVENTION EQUIPMENT:

Description	Inspection Procedures	Test Procedures

Inspection or Test Date	Condition	Action Taken	Supervisor's or Inspector's Signature

Name of Facility: _____

Operator: _____