



MEMORANDUM

To: IADC American Regional Members

From: John Pertgen, Assistant Director, Offshore Technical and Regulatory Compliance

Subject: Meeting Summary: Best Management Practice for Blasting and Painting

Date: 15 October 2007

A meeting of drilling contractors was held on 5 October 2007, at the offices of Diamond Offshore Drilling, to discuss and further explore the requirements for developing and implementing a best management practice (BMP) for the maintenance activities of blasting and painting on MODUs. The requirement for a BMP, in conjunction with the use of API TB 91 (*Planning and Conducting Surface Preparation and Coating Operations for Oil and Natural Gas Drilling and Production Facilities in a Marine Environment*), were included in the recently revised NPDES General Permit (GP) for oil and gas operations in the Western Gulf of Mexico (GMG290000) that went into effect on 1 October 2007.

Following attendee introductions, which included numerous representatives from ten different drilling contractors, the following items were discussed:

1. GP requirements for wastes associated with maintenance activities (specifically blasting and painting).
2. The proposed Offshore Operators Committee's (OOC) options for drilling contractors to consider with regard to developing and implementing a BMP under the new GP, as follows:
 - a) The rig contractor gains (their own) coverage under the EPA GP and develops its own BMP plan to perform painting and sandblasting; or
 - b) The rig contractor performs painting and sandblasting under the operator's BMP plan as agreed upon by the contractor and the operator; or
 - c) The rig contractor develops their own BMP for painting and sand blasting and, with operator's concurrence, falls under the operator's GP.

3. EPA Region 6's email responses to IADC and Transocean, regarding GP coverage questions were reviewed by the group with a copy of the response to Transocean provided to the attendees.

Of particular note in the EPA's response to Transocean was the statement: **“If proper BMPs are followed and you collect all the waste that you reasonably can, you are meeting the intent of the discharge prohibition for maintenance waste and we (EPA) would consider that you do not have a discharge. If there is no discharge, no permit is needed.”**

Mr. Scott Wilson, Environmental Scientist for EPA Region 6, who was in attendance, confirmed EPA's statement as correct and accurate. He further stated that coverage under the permit could be obtained, but in general that it is not necessary for a contractor to get a permit if they possess and follow a BMP for blasting and painting operations. Additionally, Mr. Wilson emphasized that it was not the EPA's intent to generate a lot of additional Notices of Intent (NOI) under this GP.

The above notes reflect the main points of the meeting. Other discussions during this meeting involved the API TB91 development and suggested contract language. Mr. Wilson also provided points of interest regarding permit coverage which included: NOI requirements; inspection requirements, jurisdictional issues; and other NOI submission and reporting nuances.

Please contact me by phone at 713-292-1945, ext. 203 if you have any questions regarding this summary.

ATTENDEES

<u>NAME</u>	<u>COMPANY</u>
Bill Winney	Atwood Oceanics
Bob Campbell	Atwood Oceanics
Stephen Fuchs	Diamond Offshore Drilling
John Auth	Diamond Offshore Drilling
Ernie Thompson	Diamond Offshore Drilling
Sean O'Connor	ENSCO International
Scott Wilson	EPA, Region 6
Jay Stiles	GlobalSantaFe Corporation
Scott Williams	GlobalSantaFe Corporation
David Faure	GlobalSantaFe Corporation
Dennis Hayes	GlobalSantaFe Corporation
J.T. Dohm	Helmerich and Payne, IDC
Rocky Smith	Hercules Offshore
Kim Parker	Hercules Offshore
Ron Cunningham	Hercules Offshore
John Pertgen	IADC
Joe Hurt	IADC
Denver Lee	Nabors Offshore
Richard Grayson	Nabors Offshore
Tracy Royce	Noble Drilling
Grant Goodeaux	Noble Drilling
Kirk Atkinson	Noble Drilling
Ray Keenan	Pride International
Barbara Carroll	Rowan Companies
Mike Marcom	Rowan Companies
Harvey Delaney	Transocean
James Rice	Transocean