




United States Department of the Interior

BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT
WASHINGTON, DC 20240-0001

November 8, 2016

Memorandum

To: Ross Laidig, Panel Chair
Lars Herbst, BSEE Gulf of Mexico Region Director
Doug Morris, Chief, Office of Offshore Regulatory Programs

From: Brian M. Salerno, Director 

Subject: Review of Panel Report for West Delta Block 105 Platform E

I have reviewed the Panel Report entitled Investigation of November 20, 2014, Explosion and Fatality, Lease OCS-00842, West Delta Block 105 Platform E. The Report presented a number of findings and conclusions arising from the explosion that resulted in the death of Jerrel Hancock, a Turnkey Cleaning Services supervisor. I thank the Panel for their work, accept the Report and am directing that follow-up actions be taken in response to the Panel Findings.

Mr. Hancock died after an explosion occurred inside the electrostatic heater treater located on the platform while the contract cleaning crew personnel were engaged in activities related to cleaning the vessel. The Panel Report identifies a number of failures in the application of basic safety management practices that may have contributed to Mr. Hancock's death. In particular, the Panel found apparent inadequacies in electrical isolation and verification of that isolation, ineffective ventilation and air monitoring of the vessel, and a job safety analysis (JSA) that did not align with the cleaning procedures and lacked specific assessments of the hazards associated with the job and equipment on which the work was to be done. These inadequacies demonstrate that not adhering to the basic tenets of a safety culture can lead to tragic results.

The Panel's recommendations underscore the importance of incorporating the elements of a strong Safety and Environmental Management System (SEMS) into every job on a facility. The report also draws attention to the importance of having a thorough, job-specific JSA with an appropriate sequence of job steps to ensure that all potential hazards are identified and mitigated and that verification of essential mitigation measures are undertaken.

I am directing the Office of Offshore Regulatory Programs (OORP), working with the Regional Directors and appropriate staff, to:

- Determine the appropriate response to the finding of deficiencies related to specific elements in the SEMS program. This may range from the submission of corrective action plan by the operator to a full or partial SEMS audit of the facility or operator.

- Assess whether BSEE should include a requirement in a facility's safety system permit that the facility have a safety device able to detect a drop in the level of the coalescing section of electrostatic treaters and have the associated function of tripping the power to the transformer and/or grid if the level drops too low.
- Review existing regulations and standards to determine if they provide adequate guidance regarding safety when performing cleaning activities on tanks or vessels that contain, or previously contained, petroleum or petroleum-related products. If appropriate, OORP should propose revisions to BSEE's regulations or industry standards.
- Issue a safety bulletin to inform industry regarding the most significant findings of the Panel investigation and provide recommendations for preventing a similar incident.

I request that a workplan for these implementing actions, together with a plan for communicating the incorporation of the findings of this report, be provided to me no later than November 15, 2016. I further request that the workplan and communications plan be incorporated into future discussions of the SEMS program. The Panel members should be consulted as necessary.

Please contact me if you have any questions regarding what actions need to be taken based on the report. I would again like to thank the Panel for its efforts in investigating this fatal incident and generating the Panel Report.