U.S. Department of the Interior Bureau of Ocean Energy Management, Regulation and Enforcement Gulf of Mexico OCS Region



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BOEMRE

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## **Cutting into Process Piping Results in Pollution Event**

Recently a pollution incident occurred when a contract construction worker, who was replacing corroded process piping on a production platform, cut into a 1-inch dump line which contained liquid hydrocarbons. The line was located over the water and the construction worker was using an electric band saw to make the cut. Although no injury or fire was associated with this incident, the cut released liquid hydrocarbons onto the worker and into gulf waters.

The BOEMRE investigation revealed the following:

- The Operator failed to recognize the hazard that the line contained hydrocarbons; and the drain valve, located approximately 45 feet from the cut, where the liquids could have been drained thus rendering the line free of hydrocarbons.
- The Operator failed to follow the company Lockout/Tagout procedures that require the use of blind flanges and skillets for isolating process piping prior to beginning work on the piping.
- The construction worker was working at an elevated height over water and was wearing a fall arrest apparatus; however, the Operator and contractor had no measures or procedures in place to rescue injured persons working at elevated heights over water.

BOEMRE has reviewed this incident and compared it with other incidents and has determined that Safety Alerts #188 and #276 are applicable in this case. Therefore, BOEMRE recommends that operators review these safety alerts prior to conducting similar operations in order to prevent potential injury/fatalities and pollution incidents.

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A **Safety Alert** is a tool used by BOEMRE to inform the offshore oil and gas industry of the circumstances surrounding an accident or a near miss. It also contains recommendations that should help prevent the recurrence of such an incident on the Outer Continental Shelf.