ANNUAL MONITORING WORKPLAN FOR FEDERAL FISCAL YEAR 2014
BETWEEN
ENVIRONMENTAL PROTECTION AGENCY, REGION 9
AND
DEPARTMENT OF THE INTERIOR,
BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT
PACIFIC OUTER CONTINENTAL SHELF REGION

This annual workplan is developed pursuant to the 1989 Memorandum of Agreement (MOA) between the U. S. Environmental Protection Agency (EPA) Region 9 and Department of the Interior, Bureau of Safety and Environmental Enforcement (BSEE), Pacific Outer Continental Shelf (OCS) Region. The MOA establishes a cooperative effort by EPA and the Pacific OCS Region to monitor activities related to oil and gas exploration, development and production on OCS offshore southern California. This annual workplan establishes the roles and responsibilities and the inspection and sampling activities to assess compliance with the National Pollutant Discharge Elimination System (NPDES) permit in place during Federal Fiscal Year 2014.

A. SCOPE OF WORK

Currently, 23 platforms are covered by one general NPDES permit and are subject to this agreement. Our mutual objective is to complete the listed inspections and sampling within the Fiscal Year. While circumstances offshore and availability of personnel may impact this objective, every effort will be made to honor it.

1. INSPECTIONS

Records

a. The Pacific OCS Region will conduct NPDES-related records review for each of the 23 platforms at least once during FY 2014. Such inspections will be conducted on a random basis.

b. The Pacific OCS Region will note any piping modifications that could affect NPDES-related discharges (e.g., water treatment, sewage treatment, cuttings chutes, etc.) indicated on the logs and note any identified changes on the EPA inspection form.

c. The Pacific OCS Region will check for compliance with requirements of the facility's current NPDES permit. Any potential permit violations will be noted on the EPA inspection form.

d. The Pacific OCS Region will note the produced water flow-rate from the previous month in barrels per day on the inspection form, if produced water is discharged from that facility.

e. The EPA and the Pacific OCS Region will modify the existing inspection forms, as necessary, to reflect changes in any new NPDES permit or EPA regulatory requirements.

Equipment

f. The Pacific OCS Region will issue notices of Incidences of Noncompliance (INCs) if violations under BSEE regulations are detected during an NPDES inspection (for example, if equipment such as wastewater treatment equipment or clogged drains is not working correctly).

g. The Pacific OCS Region inspectors will conduct visual checks of the platforms to look for piping modifications and inspect all seals that have been placed on any lines leading to the discharge points. Piping changes noted in 1(b) will be verified visually.

2. SAMPLING

a. Each platform discharging produced water will be sampled by the Pacific OCS Region once during the year for whole effluent toxicity analysis (see Section E). Samples will be taken as "grab" on a single day on the platform; sampling will be included in Pacific OCS Region's routine inspection activities offshore that day. The samples will be analyzed by EPA.

b. Six (6) OCS facilities discharging produced water will be sampled once during the year by Pacific OCS Region and/or EPA for chemical analysis identified in Section E, below. The sampling of the six platforms will be scheduled as determined by the Pacific OCS Region and EPA. Samples will be taken as "grab" and will be analyzed by EPA or by an EPA-designated contract laboratory. Toxicity samples may be taken during these events and will be included in the toxicity samples noted above in Section 2a.

c. If requested in advance by EPA, the Pacific OCS Region will collect a sample of drilling mud from wells drilled from an OCS facility, if the mud is to be discharged into the ocean. The mud will be tested for toxicity by EPA. Samples will be collected as close to the maximum well depth as possible, with a target of collecting at least 80% of depth. Prior to the first toxicity test sampling, EPA will notify the Pacific OCS Region of any special procedures required by the lab for handling and shipping of the samples. Samples should not be collected by the operator unless a Pacific OCS Region representative is present to witness the collection of samples.

d. Permittees are required to notify EPA's Clean Water Act (CWA) Compliance Office of impending mud dumps. The CWA Compliance Office will determine if testing is required. If testing is required, the CWA Compliance Office will promptly notify the EPA Region 9 Lab, which will promptly contact the Pacific OCS Region California District Office in Camarillo to make arrangements for the collection and shipment of mud samples. EPA anticipates sampling and toxicity analysis of four (4) drilling muds this fiscal year.

e. Inspection and sampling schedules will be kept confidential from the operators, and the inspections will be unannounced.

B. RESPONSIBILITIES

1. The Pacific OCS Region will conduct the NPDES records inspections and sample collection.
2. The EPA will prepare the Sampling Plan and provide a copy to the Pacific OCS Region.
3. The EPA will coordinate all sampling inspections with the Pacific OCS Region at least 4 weeks in advance of the inspections.
4. The EPA will provide all sampling equipment, bills-of-lading, chains-of-custody, sampling bottles, paperwork, shipping forms, packaging materials and coolers for all sample collections.
5. Each agency will send the other agency copies of final reports (inspections, lab results, INCs, etc.) as described in the 1989 MOA. Inspection reports completed by the Pacific OCS Region will be transmitted to EPA within 30 days after being deemed "final."
6. EPA is the lead agency for public inquiries on the lab analysis, and BSEE is the lead agency for facility inspections and general facility information.
7. If EPA and/or the Pacific OCS Region are unable to conduct the activities outlined in A.1 or 2 above (due to budgetary constraints or for other reasons), EPA will request the Central Coast Regional Water Quality Control Board (CCRWQCB) to conduct these activities (as the CCRWQCB's resources allow) in place of EPA and/or the Pacific OCS Region. (See letter from Roger Briggs, Executive Officer, CCRWQCB to Alexis Strauss, Director, Water Division dated October 4, 1999.) The CCRWQCB and the Pacific OCS Region will coordinate these inspections.

C. FUNDING TRANSFER

1. The EPA will reimburse the Pacific OCS Region for additional costs related to the monitoring and inspection duties pursuant to the 1984 MOU and 1989 MOA for BSEE service during FY 2014. The Pacific OCS Region and EPA will agree on the amount of reimbursement prior to conducting the monitoring and inspections.
2. The actual funding transfer will be accomplished by using the On-line Payment and Collections (OPAC) system. The Pacific OCS Region will forward the charges to the BSEE Finance Division, which will initiate the funding transfer on the OPAC system.

D. RESPONSIBLE STAFF

1. Inspection reports and INCs completed by the Pacific OCS Region will be transmitted to EPA at the following address:

   US EPA, Region 9
   Enforcement Division (ENF-3-1)
   75 Hawthorne Street
   San Francisco, CA 94105
   Attention: Ken Greenberg

2. Collected samples will be sent to, and laboratory analyses will be conducted at, the following address:

   EPA Laboratory
   1337 S. 46th St., Bldg. 201
   Richmond, CA 94804-4698
   Attention: Sample Custodian

3. Laboratory results completed by EPA will be transmitted to the Pacific OCS Region at the following address:

   James Salmons
   Bureau of Safety and Environmental Enforcement
   Pacific OCS Region
   770 Paseo Camarillo, 2nd Floor
   Camarillo, CA 93010

4. Sampling supplies for the drilling mud assays and produced water sampling will be transmitted by EPA to the Pacific OCS Region at the following address:

   James Salmons
   Bureau of Safety and Environmental Enforcement
   Pacific OCS Region
   770 Paseo Camarillo, 2nd Floor
   Camarillo, CA 93010

5. To the extent that the Central Coast RWQCB substitutes for the activities of the EPA and/or the Pacific OCS Region following address shall be used:

   Harvey C. Packard
   Central Coast RWQCB
   895 Aerovista Place, Suite 101
   San Luis Obispo, CA 93401

6. FY 2014 staff and phone numbers

<u>EPA</u>		
Amy Wagner	EPA Region 9 Laboratory-toxicity testing and sampling	510-412-2329
Rich Bauer	EPA Region 9 Laboratory-chem testing	510-412-2312
Greg Nagle	EPA Region 9 Laboratory-chem sampling	510-412-2334
Ken Greenberg	Enforcement Division	415-972-3577
Eugene Bromley	NPDES Permits Office	415-972-3510
<u>BSEE</u>		
James Salmons	Pacific OCS Region	805-384-4708
Daniel Knowlson	California District Manager, Pacific OCS Region	805-389-7775

CA RWQCB
Harvey C. Packard Central Coast RWQCB (805) 542-4639

E. SAMPLING AND INSPECTION PARAMETERS

Platform	Frequency	Parameters
Six Platforms Discharging Produced Water	Once each per year	Oil and grease, and other parameters by platform as set forth in Appendix B of general permit No. CAG280000
Each Platform Discharging Produced Water	Once each per year	Red abalone (larval development) toxicity testing
All Platforms	Once each per year	Records and equipment checks (see Section A.1)

F. SIGNATURES

Brenda B Bettencourt 2/5/14
Brenda Bettencourt, Laboratory Director, Region 9 Date
U. S. Environmental Protection Agency

1/9/2014
Jane Diamond, Director, Water Division, Region 9 Date
U.S. Environmental Protection Agency

Mike Mitchell FOR. 1/29/14
Daniel Knowlson, District Manager, California District Date
Bureau of Safety and Environmental Enforcement
Pacific OCS Region

1/14/2014
Kenneth R. Seeley, Ph.D., Date
Regional Environmental Officer
Bureau of Safety and Environmental Enforcement
Pacific OCS Region