



Bureau of Safety and Environmental Enforcement

Office of Structural & Technical Support (OSTS) Permitting Workshop Presentation

May 26, 2021
OOC Virtual Permitting Workshop
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“To promote safety, protect the environment and conserve resources offshore through vigorous regulatory oversight and enforcement.”

General Permitting - OSTTS

30 CFR 250 Subpart I & Subpart Q

- OSTTS is responsible for permitting and review under this Subpart
- These subparts have the guidance for the types of permits and other information that needs to be submitted to OSTTS
- Contact OSTTS directly if you have any questions related to information required for a submittal
- If you have questions about a specific permit or review that has been assigned to an OSTTS engineer, feel free to contact that engineer directly. If you have a question related to policy, procedure, or something in general, contact me
- OSTTS expectation is adherence to the regulation

CVA Discussion

Submittals Requiring a Certified Verification Agent (CVA)

- CVA nominations will NOT be approved without verifications plans. The CVA nomination is to be a part of the verification plans per 30 CFR 250.911(e)
- The CVA does not speak for BSEE, make decisions for BSEE, or approve anything on behalf of BSEE
- The CVA conducts *independent* assessments related to the design, fabrication, installation, modification, or repair of a platform as needed
- The CVA is the primary contact with the Regional Supervisor (BSEE)
- The CVA is NOT the liaison between the operator and BSEE or industry and BSEE

Class Discussion

Classification and the Certified Verification Agent (CVA)

- Class is not a requirement for BSEE
- Class requirements are not a substitute for BSEE requirements → Class does not mean that you are automatically covered under BSEE regulations
- The operator needs to make sure that BSEE is not circumvented when dealing with Class
- Although an organization may serve as both the RCS and CVA, the roles are different
- Neither the Class Society or CVA should be advising an operator what information should or shouldn't be sent to BSEE. If you have questions or need clarifications, contact BSEE

Decommissioning Discussion

Removal Applications (including Site Clearance Verification Plans)

- OSTS is the group that issues the approval permit
- The high-level process:
- App comes into OSTS → OSTS completes their review → OSTS creates reviews for BOEM & BOEM begins their environmental reviews → Once BOEM is finished, OSTS is notified and creates the reviews for OEC & OEC reviews → Once OEC is finished with their reviews, they provide mitigation to OSTS who will issue the approval
- OSTS does not govern another BOEM's or OEC's review processes or timing
- Please be sure to completely fill out and submit the BiOp information with your applications. If you aren't using divers or have something else that may not apply, "N/A" is an acceptable response. Do not leave blank or omit any information.
- If the site clearance NTL is referenced, please be sure it is the most recent one (NTL No. 2019-G05)

Codes and Standards Discussion

Definitions

Standard(s): Refers to any bulletin, recommended practice, or specification [does not include RCS rules]

RCS Rules: Recognized classification society rules

IBR: Incorporated by reference in 30 CFR 250.198

First-Tier Standard: a standard that is directly IBR in 30 CFR 250.198

Second-Tier Standard: a standard referenced in a first-tier standard but not directly IBR

Codes and Standards Discussion (cont.)

When Alternate Compliance is Required

- When requesting a newer edition of a standard that is incorporated by referenced in 30 CFR 250.198. [See 30 CFR 250.115(d)]
- When or if choosing to use a standard or RCS rule in lieu of a standard incorporated by reference in 30 CFR 250.198. [See 30 CFR 250.901(b)]

Also note 30 CFR 250.115(c):

(c) The effect of incorporation by reference of a document into the regulations in this part is that the incorporated document is a requirement. When a section in this part refers to an incorporated document, you are responsible for complying with the provisions of that entire document, except to the extent that the section that refers to the document provides otherwise. When a section in this part refers to a part of an incorporated document, you are responsible for complying with that part of the document as provided in that section.

(d) Under §§250.141 and 250.142, you may comply with a later edition of a specific document incorporated by reference, provided:

(1) You show that complying with the later edition provides a degree of protection, safety, or performance equal to or better than would be achieved by compliance with the listed edition; and

(2) You obtain prior written approval for alternative compliance from the authorized BSEE official.

[84 FR 21968, May 15, 2019]

Codes and Standards Discussion (cont.)

When Alternate Compliance is NOT Required

- When second-tier standards are identified in a first-tier standard and are necessary for compliance with the incorporated standards.
 - Example: API RP 2U & API RP 2V referenced in Section 3.5 of API RP 2FPS (2001); IBR 30 CFR 250.198(h)(49)
- When RCS rules are identified in a first-tier standard and are necessary for compliance with the incorporated standards. However, a write-up explaining the specific RCS rule being used is required.
 - Example: Mooring Chain referenced in Section 8.2.2 of API RP 2SK, 3rd Edition; IBR 30 CFR 250.198(h)(52):
“Mooring chain should be manufactured according to one of the following specifications:
 - API Spec 2F, Specification for Mooring Chain (Reference 10)
 - RCS (Recognized Classification Society) Rules for Offshore Mooring Chain (Reference 11)”

Technical Reviews

OSTS Performs Technical Reviews in Support of DOI

These include but are not limited to:

- Temporary cranes (the appropriate District requests the review)
- Hurricane jack-up fitness (the appropriate District requests the review)
- Temporary quarters (the appropriate District requests the review)
- Conductor repairs (the appropriate District requests the review)
- Subsea infrastructure [foundation/structural steel] (the Pipeline Section requests the review)
- DWOP (the Technical Assessment Section requests the review)



Any Questions?

BSEE Website: www.bsee.gov



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DOCUMENTATION CHECKLIST

To assist operators with what information OSTs looks for when performing subsea infrastructure reviews

Design Information

- Design Methodology/Design Basis Documents (including loads/forces that were used in the design and metocean considerations)
- Design Report Documents
- Structural Design Documents

Geotechnical Information

- Geotechnical report (soil report) certified by a licensed geotechnical firm or engineer verified for use in the area in which the subsea infrastructure is being proposed for installation
 - *If the geotech information/report is not specific to the installation site, a report certified by a licensed geotechnical firm or engineer is needed to verify the adequacy of the geotech information being used*
- Location of the Geotech info relative to the proposed location of the subsea infrastructure

Shallow Foundation Design

- Design documentation that checks and accounts for the following:
 - (Undrained) Bearing Capacity
 - Sliding Stability
 - Short Term Deformation/Displacement
 - Long Term Deformation/Deflection
- Design, calculations, and drawings (drawings for steel skids or mudmats) certified by a licensed professional engineer

Suction Pile Design

- Design documentation that checks and accounts for the following:
 - Penetration analysis to demonstrate penetration resistance and appropriate suction pressures to achieve design penetration resistance exerted on the pile by the soil.
 - The required underpressure (ΔU_{req}) to allow anchor embedment including a high and low estimate of penetration resistance
 - The maximum allowable underpressure for embedment (ΔU_{allow}) – the ‘not to exceed suction pressure’.
 - The critical underpressure (ΔU_{crit}) that will cause a general reverse bearing failure at the anchor tip and a large soil heave within the pile. (This addresses soil plug heave inside the pile.)
 - Adhesion Factor during Installation α_{ins}
 - Bearing Capacity Factor N_c
 - Structural analysis results to verify all unity checks / safety factors are within acceptable allowables (and if not have the issues been mitigated with additional design analysis or changes)
 - Pile removal analysis which provides results to support a plan for removal at the end of project life. The pile removal analysis should determine the overpressure for pile extraction without causing an overload of the soil bearing capacity. *The maximum extraction pressure allowed should not be higher than the pressure causing overload of the soil bearing capacity at the pile tip.*
- Design, calculations, and drawings certified by a licensed professional engineer

Codes and Standards

- If codes and standards used differ from API RP 2A or API RP 2GEO, 1st Edition, a comparative analysis demonstrating that the codes and standards used meet the minimum requirements of API RP 2A & 2GEO may be requested.

****Note: this document is for reference only– the OSTs engineer may request additional information as necessary**