March 22, 2012

Dear Subcommittee Member:

Subject: Subcommittee Meeting- Petroleum Safety Orders-Drilling and Production, Sections 6505, 6625.1 and 6651, in regards to Diesel Engine Air-intake Shutoff Devices

The purpose of this letter is to invite you to attend a subcommittee meeting of the Occupational Safety and Health Standards Board (Board) in Sacramento, California, on April 3, 2012. The subcommittee will consider amendments to the Petroleum Safety Orders to address the hazards associated with the failure to control run-away diesel engines where accidental releases of flammable or combustible gas or vapor could occur and result in a catastrophic ignition of the gas cloud at oil and gas well sites.

The proposal to amend Sections 6505, 6625.1 and 6651 is a result of Petition No. 516. The Board directed that an advisory committee be convened to consider requiring air intake shutoff devices and cyclone type spark arrestors on specified internal combustion engines operated at oil and gas production sites. The advisory committee meeting, held on February 8, 2011 in Sacramento, resulted in a tentative agreement to require all diesel engines operated within 50 feet from an open wellbore to be protected from runaway conditions by means of an automatic air intake shutoff valve or alternative effective means. The resulting proposal required all diesel engines operated within 50 feet from an open wellbore or other source of flammable gas or vapor to be protected from runaway conditions by following one of five alternative means, including an option to use an automatic air intake shutoff valve. The proposal was heard at the Board’s Public Hearing on November 17, 2011 and resulted in numerous comments from Board members and stakeholders expressing concerns about the proposal.

Following a review and consideration of the comments, Board staff modified the proposal and concluded that a subcommittee should be convened to discuss the necessity of the revised proposal and to review the proposal. The subcommittee will consist of select members of the advisory committee made up of six labor members, six management members, one member representing the Division and the Petitioner.

The subcommittee will review the proposed rulemaking to address hazards associated with diesel engine runaway conditions at oil and gas well sites and consider comments and documentation received during the proposal’s comment period that ended on November 17, 2011.

The one-day subcommittee meeting has been scheduled as follows:
Date: Tuesday, April 3, 2012  
Time: 10:00 a.m. - 4:30 p.m.  
Location: Conference Room  
2211 Park Towne Circle, Sacramento, CA

Attached for your information and consideration are the following:

1) Meeting agenda  
2) Subcommittee membership roster  
3) Proposed modified regulatory text  
4) Comments received during the 45-day comment period

Please review the rulemaking proposal and be prepared to discuss the necessity of the proposed new standard language and the potential fiscal impact these changes may have.

If you are unable to attend the meeting, we encourage you to send an alternate or provide written comments to me by March 30, 2012. Written comments received by that date will be reviewed and considered during the subcommittee meeting.

Your assistance in this rulemaking process is most appreciated by the Board and staff. If you have any questions or comments, please contact me at (916) 274-5723, or by e-mail at hboersma@dir.ca.gov.

Sincerely,

Hans Boersma  
Senior Engineer, Standards

Attachments

cc: All Standards Board Members  
Marley Hart, Executive Officer, OSHSB  
Michael Manieri, Principal Engineer, OSHSB  
Ellen Widess, Chief, Division of Occupational Safety and Health (DOSH)  
Deborah Gold, Deputy Chief, DOSH  
Patrick Bell, Principal Engineer, DOSH Research & Standards Unit  
David Shiraishi, Area Director, Federal OSHA  
Kevin Thompson, Cal/OSHA Reporter