



*SPR Inglewood Oil Field*  
Safety Inspection, Maintenance and  
Quality Assurance Program

*Safety Audit*

November 2022





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## SIMQAP Overview

Sentinel Peak Resources (SRP) operates the Inglewood Oil Field in the County of Los Angeles and is subject to the Baldwin Hills Community Standards District (CSD) of the Los Angeles County Title 22 Zoning Code section 22.310. The CSD establishes permanent development standards, operating requirements and procedures for the portions of the Inglewood Oil Field that are within unincorporated Los Angeles County to protect the comfort, health, safety, and general welfare of people living, working, and recreating in the surrounding areas. CSD's Section 22.310.060.C requires that the operator of the Inglewood Oil Field comply with all the provisions of a *Safety Inspection, Maintenance, and Quality Assurance Program* (SIMQAP). The SIMQAP provision is listed below:

### *C. Safety Inspection, Maintenance, and Quality Assurance Program ("SIMQAP")*

*The operator shall comply with all provisions of a safety inspection, maintenance, and quality assurance program that has been approved by the director and the fire chief.*

#### *1.. SIMQAP Requirements. The SIMQAP shall, at a minimum provide for:*

- a. Inspection of construction techniques;*
- b. Regular maintenance and safety inspections;*
- c. Periodic safety audits;*
- d. Corrosion monitoring and leak detection; and*
- e. Inspection of all trucks carrying hazardous and/flammable material prior to loading.*

#### *2. SIMQAP Updates. The operator shall periodically review and revise the SIMQAP to incorporate changes in procedures, and new safety and maintenance technologies and procedures. The operator shall make such revisions at least every five years, or more frequently if the operator determines changes are necessary or if requested by the director or the fire chief. The operator shall submit SIMQAP updates to the director and the fire chief for their review and approval. The director shall complete the review of SIMQAP updates as soon as practicable and shall either approve the updated SIMQAP or provide the operator with a list of specific items that must be included in the SIMQAP prior to approval. The operator shall respond to any request for additional information within 30 days of receiving such request from the director, unless extended by the director.*

#### *3. Worker Notification. The operator shall ensure that all persons working on the oil field comply with all provisions of the currently approved SIMQAP.*

#### *4. Inspections. The SIMQAP shall provide for involvement of County staff or the environmental compliance coordinator in all inspections required by this section.*

The SIMQAP document, CSD 22.310.060.C.2 was approved by the County on April 13, 2011, updated in May 2016 and approved by the County in June 2016 to reflect removal of certain tanks and other equipment. The current version of the SIMQAP document is dated June 2021. As noted, under provision 22.310.060.C.1.c above, the SIMQAP requires periodic safety audits. The first SIMQAP audit was completed in July 2016 with the second audit documented in August 2018. This report provides a summary of the review conducted for the third SIMQAP audit completed pursuant to CSD Provision 22.310.060.C.1.c. The first two audits are summarized below.



## 2016 SIMQAP

As noted above, the first SIMQAP audit was completed in July 2016 and included one audit finding involving recordkeeping and document organization. The audit recommended that the operator train staff in enhanced recordkeeping and organization to facilitate future audit reviews and make the process more efficient for operator staff and agency reviewers. For the 2018 audit, the operator provided dedicated staff to assist with the review and the audit process was significantly more efficient and timelier than the 2016 audit.

## 2018 SIMQAP

The second SIMQAP audit was completed in August 2018 with four findings. The findings and status of those recommendations are summarized in the table below.

2018 SIMQAP Audit Findings	
Finding	Status
Train staff for familiarity with the SIMQAP audit documentation to facilitate County review of the information.	For the 2022 audit SPR provided four dedicated staff during the office document review portion of the audit. SPR staff had paper documents and computer records prepared for review and obtained additional information as requested by audit staff. In addition, staff at the Gas Plant were available to discuss and provide documentation as requested.
The SIMQAP document should be updated to reflect the current operator and throughput data.	The entire SIMQAP was updated in June 2021 consistent with the five year update requirement pursuant to 22.310.060.C2.
Review the hazardous waste storage area and organize or improve labeling of the containers to facilitate content information to staff, agency, and emergency responders.	The hazardous waste storage area was reorganized and re-labeled Fall 2018.
Prepare and implement a Transportation Risk Management Prevention Program (TRMPP) for the vehicles that load and transport hazardous materials from the Gas Plant and vehicles that deliver hazardous materials to and from the oil field	Section 6.4 of the SIMQAP, <i>Inspection of Trucks Carrying Propane and NGLs</i> , contains procedures for truck inspection and loading.

## Audit Protocol

### SIMQAP Audit Items

A SIMQAP audit process includes both field inspections and document review by issue area experts and regulatory agency staff. A typical SIMQAP audit includes, but is not limited to, review of the following:

- Equipment inspection and maintenance records;
- Piping and Instrumentation Diagrams (P&IDs) to ensure they are up to date;
- Corrosion control and corrosion monitoring programs;
- Operator training records including recertification and revalidation;
- Management of Change (MOC) records;
- Flow, temperature, pressure level device inspections, PSV testing, etc.;
- Fire protection system inspections;

- Validation of emergency and process alarms and shutdown systems;
- Review and validation of procedures;
- Accident reports;
- Near miss program;
- Facility response plans and agency required documentation;
- Safety program management; and
- Corporate and facility audits.

### Inglewood Oil Field SIMQAP Audit

The audit completed for the Inglewood Oil Field was based on the inspection and maintenance programs outlined in the SIMQAP document initiated pursuant to the CSD Section 22.310.060.C.2 (formally 22.44.142.F.3.b). The audit consisted of document review, review of onsite computer equipment inspection and maintenance data bases, review of training records, staff interviews, and field inspections over the course of scheduled compliance site visits conducted by the Environmental Compliance Coordinator. Site visits to perform the SIMQAP Audit were conducted on August 9, August 30, October 4, and October 19, 2022. Follow-up reviews were done in the office while reviewing documentation provided by SPR. Specific documentation and discussion of every item reviewed under the audit is included in the attached table.

## Findings and Recommendations

### Findings

The results of the SIMQAP audit are summarized below.

#### 1.a Inspection of construction techniques.

No significant construction projects have occurred over the last few years and no drilling has occurred at the site since June 2014. Landscaping projects, including installation of irrigation systems, were completed in December 2018. Field review of various smaller projects included the Job Safety Analysis (JSA) document and confirmation that "tail-gate" safety meetings occurred prior to initiation of construction activities. Several out of service tanks, the old gas plant control room, and the old TVIC building were demolished and removed in 2022. Best Management Practices (BMPs) for storm water and sediment control were observed multiple times during site visits.

#### 1.b Regular maintenance and safety inspections.

Completion of this SIMQAP audit along with the annual review of the EQAP submittals provide documentation compliance with the regular maintenance and safety inspection requirements of the SIMQAP.

#### 1.c Periodic safety audits.

Completion of this SIMQAP audit fulfills the periodic safety audit requirement; additional safety audits will be scheduled in the future.

#### 1.d Corrosion monitoring and leak detection.

Implementation of the inspection and monitoring program detailed in the Pipeline Integrity Manual, interviews with SPR pipeline staff, and the onsite review of those inspection records as part of the safety audit demonstrate compliance with the corrosion monitoring and leak detection requirements of the SIMQAP.

1.e Inspection of all trucks carrying hazardous and/flammable material prior to loading.

Review of the requirements in Section 6.4 of the SIMQAP, *Inspection of Trucks Carrying Propane and NGLs*, and field interview with SPR staff confirm compliance with the SIMQAP requirements. The audit included review of the Standard Operating Procedures and Hazardous Materials Security Plan for the loading rack at the Gas Plant.

b. SIMQAP Updates.

The SIMQAP document is updated, reviewed, and approved by the County. The current version is dated June 2021. The document requires updating to reflect any changes in operations, the current operator and throughput data.

c. Worker Notification. The operator shall ensure that all persons working on the oil field comply with all provisions of the currently approved SIMQAP.

Review at the SPR offices of the computer-based training records software program and the training record documentation of SPR and sub-contractor staff demonstrate compliance with the SIMQAP requirements for worker notification.

d. Inspections. The SIMQAP shall provide for involvement of County staff or the environmental compliance coordinator in all inspections required by this section.

SPR provided access to the Inglewood Oil Field facility, a computer terminal to review training and inspection records, and hard copy documentation to facilitate completion of the SIMQAP audit.

No significant issues or deficiencies were noted during the audit process.

## Recommendations

Results of the audit generated the following recommendation in response to recent drought conditions and the associated wildfire risk, to improve County understanding of SPR facility electrical maintenance activities and to improve the overall safety and maintenance activities at the oil field.

### Audit Recommendation #1

It is recommended that SPR update Section 3.1.2, *Electrical Inspections and Vegetation Control* and Section 6.5, *Inspection of Electrical Equipment*, of the SIMQAP document, to provide a more detailed list of the electrical maintenance procedures conducted to prevent wildfires. A more detailed list, and the associated documentation, will provide the County DRP and County Fire with a better understanding, and the ability to review, the existing electrical maintenance program at the oil field.

The recommended update to the SIMQAP document is pursuant to requirements of CSD Section 22.310.060.C.2:

**22.310.060.C.2 SIMQAP Updates.** *“The operator shall periodically review and revise the SIMQAP to incorporate changes in procedures, and new safety and maintenance technologies and procedures. The*



*operator shall make such revisions at least every five years, or more frequently if the operator determines changes are necessary or if requested by the director or the fire chief.”*

## Documents Reviewed

The documents and records reviewed as part of the SIMQAP audit are listed below. Note that much of the information and documentation reviewed during this audit consisted of internal SPR company operational records. Therefore, the review was conducted on-site at the Inglewood Oil Field offices and at the Inglewood Oil Field Gas Plant Control Room. SPR provided access to the audit team to inspection and training documentation tracked on computer software, review of hard copy records and checklists, and field verification visits.

## Compliance Plans

- SIMQAP
- Emergency Response Plan (ERP)
- Pipeline Integrity Manual
- Spill Prevention, Control, and Countermeasure Plan (SPCC)
- Fire Protection Plan (ERP)
- Hazardous Materials (Business Plan)
- Environmental Quality Assurance Program (EQAP) annual submittals.

## Records/Checklists

- Supervisor Monthly Facility Self Inspection Maintenance
- Maximo® computer maintenance
- SCAQMD Rule 1173 inspection
- SCAQMD Rule 1148.1 well cellar inspection
- Employee and sub-contractor training
- Job Safety Analysis (JSA)
- VR compressor quarterly maintenance
- VR compressor quarterly electric maintenance
- Operator daily inspection
- Supervisor facility inspection
- ESD station checklist
- Fire extinguisher checklist
- Ladder inspection checklist
- Hazardous waste area checklist
- Gas detector calibration checklist
- Eye wash shower checklist
- Pipe inspection table
- Tank-sump-fans checklist
- Fire protection system checklist
- Oil pipe inspection table
- Pipeline and tank inspection reports
- Pressure relief valve tests
- Gas detector calibrations

- Pressure vessel checklists
- Daily gas plant checklist
- Control and alarm checklists
- Gas Plant loading rack Standard Operating Procedures.

### **Audit Tracking Table**

The table on the following pages details items reviewed or checked as part of the SIMQAP audit. As noted above, records were reviewed on site at the Inglewood Oil Field. The audit tracking table details the records, documents, plans, and permits reviewed.

SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
<b>PSVs and PVSVs (Pressure Safety Valves and Pressure Vacuum Safety Valves*)</b>				
Review test records (tested annually)	Annually	Test Records	Review records on-site	<p>Reviewed PSV test records; detailed review of specific test records:  24 PSVs in oil field including tank farms, August 2021.  36 PSVs at AWT locations, October 2021.  102 PSVs at Gas Plant, August and September 2021.</p> <p>PSVs are tested by third party, Caltol/Emerson.</p> <p>PSV is removed from service and tested by compressed nitrogen at release pressure, confirm release, reset, and re-installed.</p>
Review event records as applicable (vent to atmosphere)		Event Record	Review records on-site Check on SCAQMD reporting	No PSV events or breakdown reports to SCAQMD in last two years.
Review follow-up/maintenance to event incidents		Follow-up Document	Review on-site Check follow-up completed	No PSV events, maintenance test records reviewed as noted above.
Portable Gas Detectors	Monthly	Inspection/ Calibration Checklist	Review records on-site	<p>Reviewed calibration records for portable gas detectors Micoclip XT and Sperian; Gas cylinders used.</p> <p>Detailed review of Eagle gas monitors at gas plant, March 2021 calibration records.</p>

SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
Pressure Vessels	Quarterly	Inspection/ Calibration	Review records on-site	<p>Reviewed monthly Pressure Vessel Checklists, detailed review of 2021 records.</p> <p>Checklist includes values for correct pilot setting, range of settings, observed setting, and final settings for temperature and pressure.</p> <p>Vessels include scrubbers, accumulators, tanks, towers, separators, and others.</p>
<b>Control, alarm, shutdown (pressure, flow, temperature, and level) devices*</b>				
Review event records as applicable		Event Record	Review records on-site	<p>Reviewed preventative maintenance (PM) records 2/15/21 through 7/14/21; 1,489 records which include control, alarm, and shutdown records.</p> <p>Detailed review of June 2022 records.</p>
Review follow-up/maintenance to event incidents		Follow-up Document	Review on-site Check follow-up completed	<p>Reviewed and discussed the follow up process generated from the Thanksgiving Day 2018 odor incident. Root cause analysis was performed with addition of high-high alarms installed at all wash / high VOC tanks determined to be the remedy.</p> <p>The tanks now have electronic and mechanical high level alarm systems.</p>

SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
Level Safety High & Level Safety Low (LSH/LSL)	Quarterly	Test Record	Review records on-site	Reviewed preventative maintenance (PM) records for high/low alarm checks.  Reviewed June 2022 checklists in detail for tanks, pumps, and injection pumps.  Reviewed 11/1/21 Tank Level Alarm Checklist.
Low Temperature Separation (LTS) – Exchangers	Monthly	Test Record	Review records on-site	Reviewed preventative maintenance (PM) records for high/low alarm checks at gas plant.  Reviewed March 14, 2022 records in detail.
Low Temperature Separation (LTS)- Vessels	Monthly	Test Record	Review records on-site	Reviewed preventative maintenance (PM) records for high/low alarm checks at gas plant.  Reviewed March 14, 2022 records in detail.
Pressure Sensors High-Low (PSHL)	Quarterly	Test Record	Review records on-site	Reviewed preventative maintenance (PM) records for high/low alarm checks at gas plant.  Reviewed March 14, 2022 records in detail.
<b>Emergency Shutdowns (ESDs)*</b>				
Review device test records			Review on-site	Reviewed ESD checklist records, Record documents quarterly testing of the ESD circuit system. Detailed review of July 2022 station check.  ESD System is also checked monthly in coordination with So. Cal Edison along with an annual forced shut down. Potential shutdown also possible for high demand due to heat waves.

SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
Review event records as applicable			Review on-site Check follow-up completed	So. Cal Edison shutdowns occurred on 9/5/22, 9/6/22, 9/7/22, and 9/8/22. No issues occurred during the shutdowns.
Review follow-up/maintenance to event incidents			Review on-site Check follow-up completed	No follow-up actions required.
<b>Corrosion control, monitoring, and cathodic protection (facility and pipelines)</b>				
Pipeline Integrity Manual		Manual	Review Manual	Reviewed manual dated October 2020. Manual consistent with CCR Title 14, Division 2, Chapter 4, Subchapter 2, Article 3, Section 1774 administered by CalGEM.  Manual details the annual visual checks and biennial hydrotest and NDT procedures.
Review corrosion coupon quarterly check documentation		Test Record	Review records on-site	Reviewed DOT Corrosion Coupon Reports. Reviewed June 2022 documentation.  Reports included the Gas Plant, gas line, Packard oil line, and water line. Reports provide mils per year corrosion rates.
Review flow line maintenance program documentation		Manual	Review records on-site	See Pipeline Integrity Manual review notes above.
Review sacrificial anode inspection records		Test Records	Review records on-site	Sacrificial anodes not used on field piping.
Pipelines (Urban Gas Intake Line, Sales Discharge Line)	Quarterly	Test Records	Review records on-site	Checked Packard 2022 shipping line test records.  Reviewed June 2022 pressure test in detail, no issues.



SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
<b>NDT Inspections: Vessels, Tanks, Piping; Pipeline Surveys</b>				
Review visual inspection documentation		CAL OSHA Pipeline Integrity Inspection Program	Review records	<p>Reviewed 7/8/22 and 7/27/22 Tank Inspection Forms.</p> <p>Form documents visual inspection and check for fugitive emissions with either gas meter or FLIR camera. Checks include pressure/vacuum man way seals, tanks seams, roof top and vapor recovery lines for leaks.</p> <p>Reviewed April 2022 FLIR camera tank inspection checklist.</p> <p>ECC regularly inspects the tanks and tank batteries including tank bottoms for leaks and stained soil. Inspection reports have not noted any issues.</p>
Review ultra-sonic testing documentation		Test Records	Review records	<p>Reviewed tank, vessel, and pipeline inspection workbooks.</p> <p>Corrosion rates are calculated in inspection reports by third party inspection companies.</p> <p>Workbooks track corrosion rates, document next inspection dates, and calculate service life of tank, vessel, or pipeline.</p>

SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
Tank inspection records (5-year inspection interval)		Test Records	Review records	<p>Reviewed Tank Inspection Worksheet. Worksheet documents lease, description, capacity, date of installation, date of external UT wall thickness reading, date of internal (API 653) inspection, and schedule for next inspection.</p> <p>Completed detailed review of T56B Tank Inspection report, bolted crude oil tank. Tank inspected per API 653 test method.</p>
Pipelines		Pipeline Management Plan	Review plan and records	<p>Reviewed Pipeline Management Plan (PMP) 2022 spreadsheet; documents test dates, next test date, corrosion rate, testing method, pipeline test code, risk classification, and repair records and other details.</p> <p>CalGEM receives data for certain pipelines for upload to the WellSTAR system.</p> <p>Detailed review of test report for TVIC #4 Header dated May 23, 2022. Inspection completed with ultra-sonic G4 wave maker testing device for internal and external corrosion.</p>

SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
<b>Equipment Repair and Maintenance Records</b>				
Repair records		Records	Review records	<p>Reviewed corrective maintenance (CM) records 2/18/21 through 7/7/22; 1,029 records; records document work order assignment and completion of work.</p> <p>Reviewed 2/15/21 through 7/14/22 preventive maintenance (PM) records, 1,489 records; records document work order assignment and completion of work.</p> <p>Work order package includes:  General work permit  Emergency Response Plan  Hot Work Worksheet  Energy Isolation Worksheet  Confined Space Entry Permit  Air Test Log  Job Safety Analysis</p> <p>Reviewed in detail work orders:  Crane Lift Operation 9/22/22  Mud Pump Maintenance 10/3/22  Vacuum truck operations 10/3/22  Road/drain maintenance 9/21/22  Vic 11 pumping unit maintenance 9/29/22</p> <p>Documentation organized and complete.</p> <p>Discussed maintenance work order procedure with SPR staff, repair activities are reviewed with staff.</p>

SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
Welding		Records	Review records	Reviewed hot work permit documentation for projects listed above.
NDTs (X-Rays, UT, MT, etc.)		Records	Review records	See notes for ultra-sonic testing under NDT category above.
Quality Assurance/Quality Control	SIMQAP	Records		SIMQAP audit documents the review.
Hand and Portable Power Tools Maintenance	Monthly	Records	Review records	Reviewed monthly Hand and Power Tool Inspection worksheets and December 2021 and September 2022 checklists in detail.
Heaters and Exchangers	Quarterly	Records	Review records	Reviewed Quarterly Heater and Exchanger Vessel Checklists, detailed review of 2022 records.  Checklist includes values for correct pilot setting, working pressure, observed setting, and final settings for pressure; temperature range, observed and final set temperature.
Machinery and Equipment Inspection	Monthly	Records	Review records	Reviewed monthly Machinery and Equipment Checklists; reviewed September 2022 checklist in detail.  Checklist includes review of: Machine guards in place around moving parts. Equipment properly maintained. Leaks around equipment, contained, cleaned up and repaired.

SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
Materials Handling and Storage Equipment	Monthly	Records	Review records	<p>Reviewed monthly Materials Handling and Storage Checklists; reviewed September 2022 checklist in detail.</p> <p>Checklist documents:  Material handling equipment in good condition.  Storage areas properly illuminated.  Cylinders properly secured and capped when not in use.  Slings identified and inventoried.  Overhead cranes properly maintained, control well marked, and personnel qualified to operate them.  Safety latch on hook of crane.  Crane labeled for maximum lifting capacity.  Hazardous materials properly stored and labeled.  Process equipment properly labeled.</p>
Compressors	Quarterly	Records	Review records	<p>Reviewed 2022 Compressor Checklist quarterly worksheets.</p> <p>Checklists includes values for correct pilot setting, working pressure, observed setting, and final settings for pressure; motor oil check, water pump check, cooling fan check, and check for excess vibration.</p>

SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
Electrical - Motor Maintenance	Monthly	Records	Review records	<p>Reviewed monthly Materials Handling and Storage Checklists; reviewed September 2022 checklist in detail.</p> <p>Checklist documents: Motors clean and free of oil, grease and dirt. Electrical rooms clean and dry. GFCI protection available for portable tools used outside. Only certified personnel work on equipment over 240V . Extension cords used for temporary power only and are in good condition without tape repairs.</p>
Electrical Panel Identification	Monthly	Records	Review records	<p>Reviewed monthly Materials Handling and Storage Checklists; reviewed September 2022 checklist in detail.</p> <p>Checklist documents: Panels properly identified and labeled.</p>
Pumps	Quarterly	Records	Review records	<p>Reviewed Pump Checklist, documents suction, discharge, seal water, and vibration checks. Reviewed March 2022 in details and noted previous months checklists.</p>



SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
Safety Manuals/Emergency Phone #s/Required Postings	Monthly	Records	Review records	Reviewed monthly Supervisor Checklist; reviewed September 2022 checklist in detail.  Checklist includes: OSHA, Labor Department and Workers Compensation posters properly displayed. Emergency Phone Numbers posted. Evacuation routes posted. SDS Binder up to date and accessible to all personnel. Safety Manual up to date and accessible to all personnel. Facility properly marked and signed near entrances. Smoking policy enforced; signs posted.
Security Gate Check	Monthly	Records	Review records	Reviewed Visual Inspection Checklists and December 2021 in detail.  Checklists document proper signage, operational status of gates, and condition of fencing.
Shutdown Valves (SDVs)- Liquid Discharge Line	Quarterly	Records	Review records	Reviewed records at gas plant, see notes above.
Tanks, Cellars, Sumps and Pumps (Production Facilities)	Quarterly	Records	Review records	Reviewed January 2022 Vapor Recover Log for tanks, production and wash tanks.
Tanks, Sumps, and Cooling Fans (Gas Plant)	Quarterly	Records	Review records	Reviewed Tanks, Sumps, and Cooling Fan Checklists. Document alarm settings, high, high low, high-high, close, open, start, stop alarms, and check for vibration.
Vapor Recovery Compressor	Quarterly	Records	Review records	Reviewed computer quarterly worksheets.

SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
Wakesha Power Generator	Quarterly	Records	Review records	Emergency power generator, reviewed computer quarterly worksheets.
<b>Computerized maintenance management system</b>				
Review Maximo® maintenance records		Records	Review records	<p>Reviewed Maximo® records on computer. Records document Work Order Number, work description, Asset identification, work type (preventative maintenance or corrective maintenance), status, target date, reported date, problem code. Reviewed random subset of records.</p> <p>Reviewed detailed Maximo® records from:</p> <p>Monthly Gas Plant Safety October 22  Block 31 broken belt repair October 2, 2022  Vic 6 repair leaking gearbox October 2, 2022  Annual Pumping unit PM August 2022  Guide Wave Test (NDT) on 6" steel pool line  BC tanks August 2022.</p>

SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
<b>Facility Documentation Review</b>				
Management Of Change (MOCs)		Records	Review records	<p>Reviewed MOC documents at gas plant.</p> <p>Reviewed MOC 2021-002 r0 in detail. Work involved replacement of process safety valve on rich amine flash gas process.</p> <p>MOC includes review of hazards, hazardous chemicals, process review, P&amp;IDs, cost info, engineering data, engineering calculations.</p> <p>Reviewed and discussed the follow up process generated from the Thanksgiving Day 2018 odor incident. Root cause analysis was performed with addition of high-high alarms installed at all wash / high VOC tanks determined to be the remedy.</p> <p>The tanks now have electronic and mechanical high level alarm systems.</p>
P&IDs		Records	Review records	<p>Significant issues are redlined on P&amp;IDs and revisions completed periodically.</p> <p>Updated for Gas Plant in August 2020.</p>
Cause & Effect Charts		Records	Review records	<p>Reviewed Cause &amp; Effect chart data (excel workbook) for gas plant systems.</p> <p>Data provided potential actions such as an alarm goes on (cause) and lists what occurs subsequently (effect) such as what other alarms are triggered, what valves close or open, what systems are closed or opened, etc. Data dated 8/31/21.</p>

SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
HAZOPS/ PHA Revalidations		Records	Review records	<p>Full HAZOP completed Summer 2018 with consultant Contek.</p> <p>Reviewed report; report included recommendations ranked as high, medium and low risk which are then addressed by SPR. Reviewed recommendation tracking workbook, all recommendations completed or in process of completion.</p> <p>Next update due in 2023.</p>
<b>Other Inspection Programs</b>				
SCQAMD Rule 1148.1	Quarterly	Inspection Records	Review records	<p>Reviewed 1<sup>st</sup> Quarter 2022 inspection records.</p> <p>Rule addresses reducing vapor leaks from well heads, well cellars and handling of produced gas.</p>
SCQAMD Rule 1173	Quarterly	Inspection Records	Review records	<p>Reviewed 1<sup>st</sup> Quarter 2022 inspection records.</p> <p>For IOF Field: 19,191 valves inspected. 10,229 other types of components inspected. Most leaks due to stuffing box.</p> <p>Gas plant: 3902 valves inspected. 12,570 fittings inspected. 1319 others inspected.</p> <p>Repair types included tightening, remove and replace, serviced, greased, closed, rebuilt.</p>

SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
SIMQAP		SIMQAP	Review document Update every five years	Reviewed document. Original dated May 2009 and approved 4/13/11. Updated and approved June 2016. Updated and approved June 2021. Confirmed with SPR that plan is still current with their operations.
<b>SPCC</b>				
Version current and updated		SPCC	Review document	Updated May 2022 Reviewed document in office. Submitted to EPA on May 13, 2022.
<b>Fire Protection Plan</b>				
Review plan		FPP	Review document	No separate plan, FPP is contained in ERP. Reviewed plan. Current version January 2022
Check plan is current and approved			Check approvals and date	No separate plan, FPP is contained in ERP.
Review updates as applicable			Review updates	No separate plan, FPP is contained in ERP.
UFC Permits, current and approved		Permits	Review	Reviewed and confirmed County of LA Fire Permits:  LP Gas; permit valid 2/11/21 to 2/11/24. Flammable and Combustible Liquids; permit valid 2/11/21 to 2/11/24. Hazardous Materials; permit valid 2/11/21 to 2/11/24. Hot Works Welding and Cutting; permit valid 2/11/21 to 2/11/24. Drill, Own Operate, or Maintain an Oil or Natural Gas Well ; permit valid 2/11/21 to 2/11/24.

SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
<b>Emergency Response Plan</b>				
Review plan		ERP	Review plan	<p>Reviewed plan, current plan dated January 2022.</p> <p>Recent ERP Drills completed on 3/27/19, 9/29/20, 3/30/21, and 4/6/22. County ECC attended the 9/29/20 and 4/6/22 drills and reviewed plan as part of drill participation.</p> <p>ERP drill attendance may include Culver City Fire, LA County Fire, OSPR including two drill evaluators, CA F&amp;WS, contractor response companies including Patriot Services and a drill coach consultant. All agencies gave SPR passing grade with high marks. All required forms were filled out.</p>
Check plan is current and approved		ERP	Check approval dates	Updated in January 2022.
Review updates as applicable		ERP	Review	ERP reviewed during 9/29/20 and 4/6/22 drills.
Annual CAN test			Confirm CAN test	<p>CAN system successfully tested on:</p> <p>12/19/19.</p> <p>12/15/20.</p> <p>12/14/21.</p>



SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
<b>Fire Protection and Detection Systems*</b>				
Fire Pump Inspection and Test Operated	Monthly	Records	Review records	Reviewed Deluge System and Fire Water Pump test and maintenance records. Reviewed May 2022 records in detail. Fire monitors Fire extinguishers Deluge and pumps Fire reels Pollution Eye wash Safety showers
Fire Reels and Hose Boxes	Monthly	Records	Review records	Reviewed Fire Reels and Hose Boxes monthly test and maintenance records. Reviewed May 2022 records in detail.
First Aid and Lock-out/Tag-out Supplies	Quarterly	Records	Review records	Reviewed Quarterly Safety Equipment Checklist, reviewed May 2022 records in detail.  Checklist confirms available first aid supplies and Lock Out/Tag Out equipment.
Gas Detectors Inspection and Calibration	Monthly	Records	Review records	Reviewed calibration schedule documentation at Gas Plant.
Emergency Eyewash & Safety Showers Station	Monthly	Records	Review records	Reviewed Emergency Eye Wash/Safety Showers monthly checklists. Reviewed May 2022 records in detail. Checks include signage, area, nozzles, valve, adequate flow and weekly flush test.
Fire Extinguishers	Monthly	Records	Review records	Reviewed Fire Extinguisher Inspections monthly checklists and May 2022 checklist in detail. Checks include charge status, safety pin, condition of cylinder, condition of hose, signage and mount.

SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
Fire Hydrants	Monthly	Records	Review records	Reviewed Fire Monitor and Hydrant Test and Maintenance Records and May 2022 checklist in detail. Data checked include valves, flow, piping, paint, signage, quarterly flush, and fire extinguishers. Records are kept as required.
Fire Monitors	Monthly	Records	Review records	Reviewed Fire Monitor inspection monthly checklists and May 2022 checklist in detail. Checks include nozzle, valve, water flow, and piping tests and review. No issues.
Personal Protective Equipment (PPE)	Monthly	Records	Review records	Reviewed Supervisor's Monthly Facility Self Inspection sheets, and May 2022 in detail.  Checklist includes: Proper Minimum PPE being worn by all Operators properly attired (No loose clothing, jewelry, etc). Job task required PPE being utilized when required. SCBA and Escape units properly maintained and available for use. Fall harnesses with tie-off equipment maintained and available for use. High Noise areas properly marked; hearing PPE available.
<b>Facility training procedures and protocol</b>				
Review training records		Records	Review records	Reviewed John Doe training for 2021, 42 different training modules, all completed.

SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
Review sub-contractor training records			Review records	Reviewed contractor training for contractor King Oil Tools, March 2021. Reviewed contractor training acknowledgment documents. Reviewed CSD Orientation Training documents. Discussed with SPR reinforcement of training with regard to minimization of noise impacts.
Incident/near miss program		Records	Review records	Reviewed and discussed with SPR their Behavior Based Safety (BBS) program. Reviewed recent documentation.
JSA (Job Safety Analysis)		Records	Review records	Reviewed JSA documentation, JSA's included in work order document package.  Each work order includes: General work permit. Emergency Response Plan. Hot Work Worksheet. Energy Isolation Worksheet. Confined Space Entry Permit. Air Test Log. Job Safety Analysis.  Reviewed in detail work orders: Crane Lift Operation 9/22/22 Mud Pump Maintenance 10/3/22 Vacuum truck operations 10/3/22 Road/drain maintenance 9/21/22 Vic 11 pumping unit maintenance 9/29/22
Root cause analysis		Records	Review records	Reviewed associated MOC records and Thanksgiving 2018 incident analysis.

SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
Review CSD awareness training records (Quiet Mode Drilling Plan, etc.)		Records	Review records	See above notes on training and training records.
<b>OSHA Required Training Records</b>				
Review training records		Records	Review records	Reviewed John Doe training for 2021, 42 different training modules, all completed. Training modules include OSHA training.
<b>Business Plan and Related Elements</b>				
Plan current and approved		Business Plan	Review Plan	Reviewed plan, current plan submitted 2/28/22 and approved 5/25/22. Culver City has separate plan.
Plan reflects current use and location of hazardous materials			Review	Reviewed plan, no issues. Hazardous waste storage area inspected by ECC during regular site inspections. Inspection records note the storage area clear of debris and the secondary containment curbed area clear. Most recent fire CUPA fire inspection September 15, 2022.
<b>LPG/NGL Transportation Safety</b>				
Review truck loading terminal procedures		Gas Plant SOPs	Review SOPs	Reviewed SOP and Hazardous Materials Security Plan at the Gas Plant. Noted that gas plant employee is required to supervise loading operations, the loading system is monitored with a computer control program, and area gates close off the loading area include a siren notification to keep clear. A grounding requirement is also noted on the loading checklist.

SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
<b>Gas Detectors*</b>				
Functional check records (monthly)				Reviewed checklists for portable monitors. Checklist includes calibration dates, battery checks, LEL check, O2, H2S, and CO response checks.
Maintenance record verification (monthly)		Records	Review records	Gas monitor trailers not in use as no drilling activity.
Review applicable documentation		Records	Review records	Reviewed 2022 gas plant four corner calibration records.