

SAFETY BULLETIN

NOTICE TO WASTE HAULERS AND OPERATORS OF DISPOSAL AND PRODUCING WELLS

Fatal Accident at Waste Disposal Facility Highlights Potential Flammability of Basic Sediment Waste From Gas Leases

INCIDENT

In January of 2003, a flash fire killed three and seriously burned four workers at a commercial oil and gas waste disposal facility. The U. S. Chemical Safety and Hazard Investigation Board (CSB) (website at www.chemsafety.gov) investigated the accident and concluded that neither the waste generator nor the waste hauler recognized the potential flammability hazard of oil and gas waste.

The accident involved two vehicles operated by employees of an authorized oil and gas waste hauler who were transporting basic sediment and water (BS&W) in 50-barrel vacuum trucks from gas leases to an authorized commercial disposal facility. Apparently the BS&W contained a significant amount of gas well condensate. The drivers discharged wastes by opening the drain valves at the rear of the vacuum trucks allowing the BS&W to drain into a concrete pit. This method of drainage released sufficient hydrocarbon vapors to form a combustible mixture in air. The drivers left the engines of the vacuum trucks running and the CSB concluded that intake of flammable vapors caused the diesel engine to initially race and then backfire, igniting the vapor cloud to cause the flash fire.

REGULATORY RESPONSIBILITY

The Railroad Commission is providing this notice to waste haulers and operators of disposal and producing wells to remind them of the importance of educating their employees about the potential hazards of oil and gas wastes. The U. S. Department of Transportation hazardous materials regulations apply to (a) each person who offers hazardous materials for transportation (oil and gas operator) and (b) each carrier who transports a hazardous material (oil and gas waste transporter). The Railroad Commission advises all authorized waste haulers and operators who generate oil and gas waste of their responsibility to determine the hazards of any oil and gas waste that they offer for transport or that they accept for transport and to comply with applicable regulations regarding worker safety and safe transportation of materials. Where appropriate, operators may need to provide multilingual notice to employers and contractors.

U. S. Department of Transportation (DOT) regulations govern the transportation of hazardous materials and, in Texas, the Department of Public Safety (DPS) administers and enforces those regulations. In addition, all employers must comply with appropriate Federal Occupational Safety and Health Administration (OSHA) safety regulations.

Appropriate methods of identifying potential hazards may include placarding for transported materials (DOT/DPS regulations) and material safety data sheets (MSDS) for chemical constituents (OSHA regulations).

RESOURCES

Information regarding hazardous material transportation and communication may be found at the following sites:

<http://www.fmcsa.dot.gov/safetyprogs/hm/complyhmregs.htm>

“How to Comply with Federal Hazardous Materials Regulations,” Federal Motor Carrier Safety Administration, U.S. Department of Transportation

<http://hazmat.dot.gov/>

<http://www.txdps.state.tx.us>

<http://www.txdps.state.tx.us/lw/Publications/hazmat.pdf>

“Do you transport hazardous materials?” U.S. Department of Transportation

<http://www.osha-slc.gov/SLTC/hazardcommunications/>

“Safety and Health Topics: Hazard Communications,” Occupational Safety and Health Administration, Department of Labor

<http://www.osha-slc.gov/SLTC/etools/oilandgas/>

“Oil and Gas Well Drilling and Servicing e-Tool—Explore the Potential Hazards of this Industry,” Occupational Safety and Health Administration, Department of Labor