



## AzSPU Internal & External Material Release Reporting & Notification Procedure

**AZSPU-HSSE-DOC-00075-2**

<b>Authority:</b>	AzSPU Regulatory Compliance and Environment Manager / Faig Askerov	<b>Custodian:</b>	AzSPU Environmental Permit Specialist / Saadet Gafarova
<b>Scope:</b>	AzSPU Ops & Projects	<b>Document Administrator:</b>	AzSPU HSE MS Document Coordinator
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<b>Revision Date:</b>	18 October 2010	<b>Control Tier:</b>	2
<b>Next Review Date:</b>	28 February 2011		

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**ABBREVIATIONS:**

**Az** – Azerbaijan

**AzSPU** – Azerbaijan Strategic Performance Unit

**BST** – Business Support Team

**ET** – Environmental Team

**Ge** - Georgia

**GIOC** – Georgia International Oil Company

**IC** – Incident Commander

**IMS** – Incident Management System (Document No. UNIF-HSE-MA-400)

**IMT** – Incident Management Team

**LWS** – Leaks, Weeps, Seeps

**MENR** – Ministry of Ecology and Natural Resources (Azerbaijan)

**MoE** – Ministry of Environment (Georgia)

**OBM** – Oil Based Mud

**PU** – Performance Unit

**SOBM** – Synthetic Oil Based Mud

**SOCAR** – State Oil Company of the Azerbaijan Republic

**SPOC** – Single Point of Contact

**SRT** – Site Response Team

**Traction** - BP Global Incident and Accident Reporting and Action Tracking System

## 1.0 Purpose/Scope

The purpose of this procedure (the “Procedure”) is to provide guidance for conducting BP internal and external agency substance material release reporting at Azerbaijan Strategic Performance Unit (AsSPU) sites in order to meet internal (BP Group) and external (MENR) compliance obligations.

This procedure also provides guidance regarding:

- The interfaces between BP internal and external agency reporting of minor (Tier 1) releases that can be dealt with using local, on site resources and larger scale releases requiring national (Tier 2 Major releases) and international support (Tier 3 Crisis incidents); and
- Threshold spill quantities that determine the level of BP internal reporting required to satisfy BP Group requirements.
- Threshold spill quantities that determine the level of BP external Reporting required to satisfy MENR requirements

This procedure applies to all AzSPU Operational Performance Units (PUs) engaged in the exploration, drilling, construction, production and/or transportation of oil and gas.

This procedure is a high level document that provides a framework for operational sites (Assets/Facilities) to implement notification and reporting processes in accordance with their PU/Asset specific legally binding agreements, whilst ensuring consistency, where applicable, across BP operations.

Detailed PU specific and country specific reporting requirements are not covered by this procedure, but can be found in relevant country and PU-specific procedures (see Section 6.0).

This procedure does not replace, nor should it conflict with existing:

- Emergency response and oil spill contingency plans;
- Notification practices regarding fires and explosions;
- Internal BP HSE reporting requirements including HSE Accountability Boundaries; or
- Leak, weep and seep identification, reporting and correction.

It should be noted that releases of untreated effluents (e.g. sewage, produced water, hazardous drainage, etc) resulting from treatment plant failure / maintenance will be reported as a material release in accordance with this procedure.

Routine operational discharges of treated effluents that are out of compliance with defined specifications (e.g. legislative permits or other standards) will be reported in accordance with the Non-Compliance and Non-Conformance Corrective and Preventative Action Procedure ([AzSPU-HSE-DOC-00040-2](#)).

If there is any doubt regarding a particular release, further guidance should be sought from the AzSPU Regulatory Compliance and Environment Manager.

Revision of this controlled procedure will be in accordance with the AzSPU Document

Management Procedure (document AzSPU-HSE-DOC-00025-2).

## 2.0 Definitions and Abbreviations

Except for the capitalized words, terms and abbreviations specifically defined and provided for in this section, all capitalized words, terms are abbreviations shall have the meaning ascribed to them in the document [AzSPU-HSE-DOC-00021-2](#).

The following capitalizes words, terms and abbreviations used in this Procedure shall have the meanings hereby assigned to them.

### Material Release or “Spill”

The term “spill” is often used without a strict definition, for the purpose of BP incident reporting the term “material release” will be used.

For AzSPU, a material release is defined as follows:

An unplanned or accidental loss of primary containment (i.e. tanks, pipelines, process vessels) of oil or other fluids from a BP or contractor operation, irrespective of any secondary containment or recovery. And releases of untreated effluents (e.g. sewage, produced water, hazardous drainage, etc) resulting from treatment plant failure / maintenance.

Material releases include (but are not limited to): oil, gas, chemicals, drilling fluids, domestic wastewater, hazardous substances, sewage, liquids, solids, non-hydrocarbon gases, halon, fuel, hydraulic oils and produced water.

Oil is defined as any mineral oil based hydrocarbon (condensate, diesel, crude, fuel oil, oil based mud / drill fluid).

Chemicals include any substance used in support of the exploration, exploitation and associated processing of hydrocarbons. Examples include, but are not limited to, operational and maintenance related substances such as production/utility chemicals like biocide, corrosion inhibitors etc, water based and non-mineral oil based muds (synthetic drill fluids), fluids like brine, cements, rig wash, pipe dope, hydraulic oils, potable water system additives, paints and other coatings, fire fighting foams, etc. Unless contaminated with mineral oil, releases of synthetic base oil, synthetic drill fluids, water based drill fluids, or completion fluids are defined as chemical material releases.

Where a mixture of substances has been released, samples may be taken for analysis if the components cannot be reasonably identified by other auditable means.

## Notifiable Releases

### Internal

All substance releases (liquids, gases or solids) shall be internally reported and investigated. There is no minimum reportable volume for internal release reporting and investigation.

### External

Releases of liquids and solids will be notified to external agencies in a prompt manner using this procedure. **External notification requirements** agreed with MENR of Azerbaijan Republic are:

- **If the release to the environment exceeds the volume of 50 L, then notification will be made within 24 hours after the incident verbally and within 72 hours in the written form.**
- **If the release to the environment is less than 50 L, then information about the release will be included into the BP AzSPU Report on Unplanned Releases and sent to MENR on monthly basis, Appropriate environmental reports to MENR also can contain information about reports, but they do not replace . the BP AzSPU Report on Unplanned Releases**

External notification requirements for Georgia should be agreed with MoE of Georgia.

All releases to atmosphere will be internally recorded and investigated. Only those releases to atmosphere that result, or have the potential to result, in a significant event (e.g. fire, explosion) will be reported externally. External reporting of atmospheric releases shall be agreed between the Asset Performance Unit Leader (Az) / Operations Section Chief (Ge) and the CHSE HSE Director or AzSPU Regulatory Compliance and Environment Manager on a case-by-case basis.

#### **Untreated Effluents**

Untreated effluents could be sewage, produced water, hazardous drainage, etc released as a result of treatment plant failure / maintenance

#### **Primary containment**

Planned primary method (e.g. tanks, pipelines, process vessels) for containing fluids.

#### **Secondary containment**

Secondary method (container/bund) used to prevent escape to the environment from primary containment (e.g. drip tray, bunds, concrete hard standing, etc.).

#### **Leaks, weeps and seeps(LWS)**

The categorization of material releases into small leaks, weeps or seeps may differ according to PU specific inspection and maintenance criteria, local operating and process conditions. All material releases, leaks, weeps, seeps shall be internally recorded and reported (as a minimum), logged, their significance evaluated and any defects corrected as soon as is practicable. Refer to PU specific guidance/criteria for the categorisation of site releases.

#### **Material release to the environment**

This is defined as a material release where there is no secondary containment (this includes all unplanned gaseous releases), or where the spillage breaches or leaks from the secondary containment and thereby comes into contact with the ground (whether inside or outside the facility boundary), including snow, ice or water.

#### **Lost of Radioactive Sources**

Notification to be done to MENR & SOCAR in case of lost sources in the wells.

**Tier 1, 2 & 3 releases**

Incidents are categorised according to the level of resource required to mitigate them. The actual categorisation of potential releases into tiers will be dictated by site-specific conditions, however the following general definitions may be used:

- Tier 1 release: a small, or minor, material release that requires no intervention, other than 'monitor and evaluate', or can be managed using local site resources.
- Tier 2 release: a material release that can be managed using the qualified contractor and/or nationally available resources.
- Tier 3 release: a significant material release the management of which requires internationally available resources.

**Traction Database Definitions**

For BP Internal Reporting purposes, all material releases, except leaks, weeps and seeps<sup>1</sup>, are to be recorded in the Traction Database using the following definitions:

- Spills contained on site, starting from minimum reportable requirement;
- Spills which reach the environment are defined by BP Group as a material release where there is no secondary containment, or where any liquid breaches or leaks from secondary containment come into contact with the environment (ground, snow, ice or water).
- A spill which reaches surface water (fresh, salt or brackish) is defined as a material release to water. Offshore is classified as 'to water' and onshore 'to land/surface water'. Spills into earthen dykes, or bunds should be classified as material releases which reach the environment, if the dykes or bunds are NOT impervious to the liquid spilled.
- Volume of product spilled: Best estimates of material release volume should be obtained using the most appropriate methods. In most cases this will be derived from knowledge of the original contents of the container involved in the spill or the time over which the spill occurred
- Volume of unrecovered spilled, or leaked material: Unrecovered material is that which remains in the environment (e.g. the ground, water atmosphere or food chain) following initial clean-up and treatment operations i.e. Volume Unrecovered = Total Volume Released – Volume Recovered.
- Atmospheric releases will be assumed to be wholly unrecovered.

**Major Incident Announcement**

Defined by BP Group as an announcement of a spill incident resulting in one of the following:

- Oil spills of greater than 100 bbls or less at a sensitive location<sup>2</sup> (e.g. spills from the Inam contract area that have the potential to reach the Kizil Agach State Natural Reserve and coastal area).
- Release of more than 10 tonnes of any chemical.

<sup>1</sup> For LWS reporting see Sangachal Terminal Leaks, Weeps, Seeps reporting Procedure (AZSPU-HSSE-DOC-00074-4)

<sup>2</sup> Ecologically sensitive areas include those which contain critically imperiled and imperiled species, threatened and endangered species, depleted marine mammal species, and those that contain a high concentration of waterfowl, or a large percentage of the world population of migratory waterfowl species.

### 3.0 Key Responsibilities

#### Employees and Contractors

Failure to report material releases, or spills, is a violation of national regulations and company policy and procedure.

Employees and contractors working within BP operational assets and sites of BP influence are required to immediately report all material releases and LWS to their supervisor or HSE personnel according to this procedure.

#### During Office Hours:

For Tier 1 releases during office hours, the AzSPU Regulatory Compliance and Environment Manager (Az) or Communications & External Affairs Manager (Ge) shall be notified to make the verbal notification required by environmental regulatory bodies of relevant countries.

Tier 2 and Tier 3 material releases will be managed according to the existing BP Incident Management System (see Section 4.1.2).

#### Supervisors and Managers

Supervisors or managers who are responsible for HSE compliance reporting within each asset shall designate a site Single-Point-Of-Contact (SPOC), e.g. On-Scene Commander, HSE Advisor, Environmental Advisor, or SRT member, for material release or spill evaluation and reporting, and arrange for alternates to be appointed during the SPOC's absences.

#### Site Single Point of Contact (SPOC)

The SPOC duties will include:

- (1) evaluating the significance and extent of material releases and spills;
- (2) performing timely internal spill notification to the IMT Duty Incident Commander (outwith normal working hours if the volume of material released to environment exceeded 50 liters) and AzSPU Regulatory Compliance and Environment Team (Az) / Communications & External Affairs Manager (Ge) according to this procedure and providing as much information as possible (see Material Release / Spill Verbal Notification Log in Attachment B); and
- (3) providing guidance to their assets on reporting, clean-up, and disposal requirements.

#### Duty Incident Commander (Azerbaijan & Georgia)

#### Out of Normal Office Hours:

For Tier 1 releases outwith normal office hours, or during extended holiday periods, the IMT Duty Incident Commander shall notify Duty Environmental Leader (Az) / Duty Liaison Officer (Ge) about the incident

#### Duty Environment Unit Leader (Azerbaijan) shall:



**Outwith normal office hours Duty Environment Unit Leader (Azerbaijan) shall:**

- contact on-site SPOC and collate the required information regarding the incident
- complete verbal notification form based on the information provided (Attachment B) and seek pre-approval from the PUL (or his delegate) before it is verbally communicated to the required external parties
- provide verbal notification to external agencies within 24 hours after the incident as per the approved notification list and ensures that the AzSPU Regulatory Compliance and Environment Team is made aware of external notifications
- informs Duty Public Information Officer to ensure that the Communications & External Affairs and other relevant departments are aware of the incident and can respond to any external requests for information as required
- informs site Environmental Advisor

**On Scene Commander (Supsa)**

For any Tier 1 release, the On-scene Commander (Supsa) shall inform the BP Georgia Incident Commander, so that an appropriate level of notification and response occurs.

Tier 2 and Tier 3 material releases will be managed according to the existing Incident Management System (see Section 4.1.2).

**On Scene Commander Exports**

For any Tier 1 release, the On-scene Commander Export shall inform the Export Operations Section Chief and / or BP Georgia Incident Commander so that an appropriate level of notification and response occurs.

Tier 2 and Tier 3 material releases will be managed according to the WREP Azerbaijan Emergency Response Plan (AzSPU-HSE-DOC-00021-5) and the WREP Georgia Emergency Response Plan (AzSPU-HSE-DOC-00360-5) and BTC Pipeline Azerbaijan Oil Spill Containment Site Manual (AZSPU-HSE-DOC-00095-5)

**Duty Liaison Officer (Georgia)**

The Duty Liaison Officer shall verbally inform the external agencies as appropriate of all material releases outwith normal office hours and during extended holiday periods.

**Duty Public Information Officer**

The Duty Public Information Officer will be involved in case of major incidents, or incidents which attract Media attention and shall:

- Obtain accurate information about the release and ensure that Communications & External Affairs and other relevant departments are aware of the incident; and
- be ready to respond to any external requests for information, as appropriate.

**Asset Performance Unit Leader (Azerbaijan) / Operations Section-Chief (Georgia)**

Responsible for approving any notification and formal documentation sent to the AzSPU Regulatory Compliance and Environment Team for further communication to external agencies as a result of a material release incident.

Responsibilities include:



- Initiating verbal notifications
- Liaising with the AzSPU Regulatory Compliance and Environment Manager / C&EA Manager (Ge) to ascertain if external notification for the incident is required.
- Approving external notification texts .
- Providing approved external notification texts to the AzSPU Regulatory Compliance and Environment Manager (Az) for communication with MENR and SOCAR or to the C&EA Manager (Ge) for communication with MoE and GIOC.
- Communicating with Lenders in accordance with Asset specific policies.

### **Legal Advisors**

When requested, to provide legal advice on correspondence with the regulator(s)

### **HSE & Engineering Vice-President , or delegate**

Responsible for establishing policy with regards to internal and external material release notification and reporting.

### **AzSPU Regulatory Compliance and Environment ( Azerbaijan ) / Communications & External Affairs Manager (Georgia)**

These responsibilities will be as follows:

#### INTERNALLY

- Identifying and interpreting discharge and release notification regulatory requirements that may apply to asset operations.
- Communicating all such requirements to asset environmental representatives.
- Providing guidance and assistance on reporting to field HSE personnel, as required.
- Liaising with PU/Asset HSE personnel to ascertain if incident investigation is required.
- Providing a final check to the contents of the notification / correspondence.
- Managing the communications and approval process and ensuring that communications are timely and accurate.
- Retaining records of communications in accordance with the AzSPU Records Control Procedure (AzSPU-HSE-DOC-00041-2).
- Maintaining this procedure.

#### EXTERNALLY

- Informing external agencies of notifiable emissions or discharges during working days/hours.
- Liaising with personnel responsible for communications with Partner and Lending Agencies.

## **4.0 Procedure/Process**

### **4.1 Spill Discovery, Verbal Reporting and Documentation**

Employees and contractors are required to **immediately** report all material releases (within 24 hours of the incident occurring) by calling the site SPOC who will evaluate the

release and notify the Duty Incident Commander (out of normal office hours) and/or AzSPU Regulatory Compliance and Environment Manager (Az) / Communications & External Affairs Manager (Ge), during office hours, according to the flowchart in Attachment A.

The SPOC, Duty Incident Commander and / or AzSPU Regulatory Compliance and Environment Manager (Az) / CE&A Manager (Ge) shall keep a documented record of the initial information and notifications thus made. The BP Verbal Spill Notification Log (Attachment B) will be used for this purpose.

The report of a spill should not be delayed unnecessarily in order to gather precise information.

#### 4.1.1. Releases into secondary containment

If a material is released into secondary containment (e.g. tanks, bunds, deck plate, hardstanding, impermeable material) and does NOT reach surface water or land, then the release shall be cleaned up, recorded as a release and any defects corrected as soon as practicable according to the existing site management system.

If the release is unlikely to escalate, no further immediate verbal notifications are required.

#### 4.1.2 Releases that breach secondary containment, or no secondary containment exists

Immediately upon notification, the site SPOC will inform the Duty Incident Commander and AzSPU Regulatory Compliance and Environment Manager (Az)/ Duty Liaison & CE&A Manager (Ge) of the release.

Following approval of information by the Asset Performance Unit Leader (Az) / Operations Section-Chief (Ge), verbal notifications shall be made to the appropriate external agencies by:

- Duty Environmental Leader (Az) / Duty Liaison Officer (Ge) (outwith normal office hours), or
- AzSPU Regulatory Compliance and Environment Manager (Az) / CE&A Manager (Ge) during normal office hours.

Tier 2 and 3 release notifications will be made according to the existing Emergency Notification Matrix (AZSPU-HSE-DOC-00087-2) for Azerbaijan (IMS 3.11.1) and Georgia (IMS 3.11.2).

It is acceptable to provide incomplete initial notification and then to retract the notification if it is not required, or to provide updated information to the regulatory agencies as more information becomes available. After initial notification has been made to the regulatory or emergency response organisations, any updates on the status of the incident should also be recorded and documented on the BP Verbal Spill Notification Log (Attachment B). Copies of Verbal Spill Notification Logs will be passed on to the AzSPU Regulatory Compliance and Environment Manager (Az) / CE&A Manager (Ge) for record keeping.

Depending upon the significance of the release, MENR/MoE and SOCAR / GIOC representatives may request a visit to oversee any site response and clean-up/mitigation activities. Whilst BP has an obligation to respond to these requests, the safety of personnel and visitors is the one of the prime concerns to be reviewed in the decision making process and scheduling of such visits. The Asset Performance Unit Leader (Az) / Operations Section-Chief (Ge) is responsible for approving external visits to their sites. (For Offshore Ops valid Medical Certificate and BOSIET are required for site visits. PPE to regulators will be provided by AzSPU Regulatory Compliance and Environment Team / CE&A )

Spills and discharges that occur during spill response and remediation as a result of attempting to mitigate future pollution threats from a release that has already been initially reported, are not considered new releases that require yet further notification to the agencies. Nor are these to be counted as new reportable material releases in [Tr@ction](#). These ongoing or continuous material releases may be entered into [Tr@ction](#) as “leaks.” The logic behind this is that all operational activities (e.g., initial notification, clean-up, and waste disposal) have been communicated to the authorities and concurrence or approval for those activities obtained. When such a plan, no matter how informal, has been approved, it essentially places the operational activity into a quasi-permitted release.

#### 4.1.3 Non-BP related material releases

If operations personnel observe a material release in the vicinity of a BP facility, that is not related to BP operations, they should do the following :

1. Log the observation in relevant facility, site documents
2. Enter a note into [Tr@ction](#).
3. Undertake actions required by this procedure for external notification to MENR & SOCAR in Azerbaijan and the Ministry of Ecology and GIOC in Georgia.

Preparation of a notification note is the responsibility of the PU while communication with MENR & SOCAR in Azerbaijan and the Ministry of Ecology and GIOC in Georgia will be done in accordance with section 3.

## 4.2 Spill Written Reports and [Tr@ction](#)

Written reports formally documenting the incident will be submitted to the regulatory time frame pre-agreed with the agency. (Ref. “Notifiable releases” in Section 2).

All material releases, regardless of volume, will be entered into [Tr@ction](#). All blanks in the [Tr@ction](#) Spill Report module shall be completed, where possible, to ensure completeness.

In the event a release is promptly reported to an agency as a “spill” but then upon feedback from the agency or upon further review, it is determined that the release was not required to be reported, the [Tr@ction](#) report may be edited to document the determination that it was a “leak” instead of a reportable “spill” for BP internal spill

accounting purposes. The name of the person making this decision and the basis for the change of status must be clearly documented in Tr@ction.

Spill reporting documentation will be retained at each facility or site based on Record Control Procedures, as follows:

- Sites will maintain spill logs, along with any incident investigation reports or related documentation (copies of Waste Transfer Manifests, laboratory analytical data for any environmental samples or hazardous material samples collected in the spill response, etc) and ;
- AzSPU Regulatory Compliance and Environment Manager (Az) / Communications & External Affairs Manager (Ge) will retain copies of the Verbal Spill Notification Log, the Tr@ction Incident Report, and records of formal written correspondence notifying and closing out these incidents with the external agencies.

### 4.3 Spill Review

Site HSE personnel will consult with AzSPU Regulatory Compliance and Environment Team in Azerbaijan and C&EA in Georgia to determine whether a formal Spill Review is necessary. If warranted, a Spill Review will be conducted to examine and determine the contributing factors, lessons learned, and potential new or improved prevention measures. In addition, recycling and reuse options for any recovered spill material and the exact volume of recovered will be evaluated and documented. Documentation of the Spill Review will be maintained by AzSPU Regulatory Compliance and Environment Team in Azerbaijan and C&EA in Georgia .

## 5.0 External Communication Process

BP will communicate performance externally (whether good or bad), comply with applicable legislation and promptly report any breaches of legislation to the relevant authorities

### 5.1 Notifiable release

The following will result in the notification of external agencies:

- A material release to the environment.
- A discharge or emission that is recorded in excess of the quantity and/or concentration limits agreed with the regulator

(Ref. Section 1 – Purpose/Scope, Section 2 – Notifiable releases)

## 5.1 External Parties to be notified

The following external parties will be notified, as applicable, in the event of a material release to the environment:

- Ministry of Ecology and Natural Resources (MENR), Azerbaijan
- Ministry of Environment (MoE), Georgia
- The State Oil Company of the Azerbaijan Republic (SOCAR)
- The Georgian International Oil Corporation (GIOC)
- Partners, as detailed in PU/Asset specific agreements
- Lending Agencies, where applicable.

## 5.2. Notification and Reporting

### **Notifiable releases less than 50 L**

All notifiable releases less than 50 L must be reported (after approval of PU senior management in accordance with Section 3) to the AzSPU Regulatory Compliance and Environment Team. AzSPU Regulatory Compliance and Environment Team will prepare BP AzSPU Monthly Report on Unplanned Releases and issue it to MENR by 25<sup>th</sup> of next month. No additional internal communication are expected to be held before issuing the Report to MENR assuming that release reports had been approved by the PU Senior management before forwarding to the AzSPU Regulatory Compliance and Environment Team.

### **Notifiable releases greater 50 L**

**Initial Notification** – As per a external notification threshold specified in the Section 2 – Notifiable releases, immediately following the observation of a material release (within 24hrs where practicable) the AzSPU Regulatory Compliance and Environment Team (Az) / Communications and External Affairs Team (Ge) will notify the appropriate external authorities of the incident. Initial communication will normally be conducted by telephone but will be prepared in written form and will require the review and approval of the following parties prior to release:

- Asset PUL (Az) / Operations Section-Chief (Ge)
- Legal Advisors (as required)
- AzSPU Regulatory Compliance and Environment Manager

The information provided should be restricted to the minimum necessary in accordance with the pro-forma (Appendix B – Notification Pro-forma, the Verbal Spill Notification Log)

**Formal Notification** – As per a external notification threshold specified in the Section 2 – Modifiable releases, a written notification will be issued within 72 hours of the incident being recorded. A formal letter based on the information provided on the Notification Pro-forma (Verbal Spill Notification Log - Appendix B) will be submitted to the external agencies. Further information may be provided regarding the cause of the incident and the volume of the release, where such information can be verified. The expected dates for completion of the incident investigation report should be provided if known. The internal approval process described above must be completed prior to issuing the letter,

which will be signed by the AzSPU HSE & Engineering Vice-President, or his delegate. The letter will be retained in accordance with the AzSPU Record Control procedure (Document AzSPU-HSE-DOC-00041-2) and should include the Report No. to permit cross-referencing to the Material Release/Spill Verbal Notification Log.

**Final Notification** – Following completion of the incident investigation report, a formal letter will be issued to the external agencies providing final and confirmed information on the release. In addition to confirming the information provided previously, the letter should include relevant findings from the incident investigation report (if applicable), specifically, preventative actions to minimize the likelihood of similar incidents occurring. The letter will be approved and retained as described above.

## 6.0 Key Documents/Tools/References

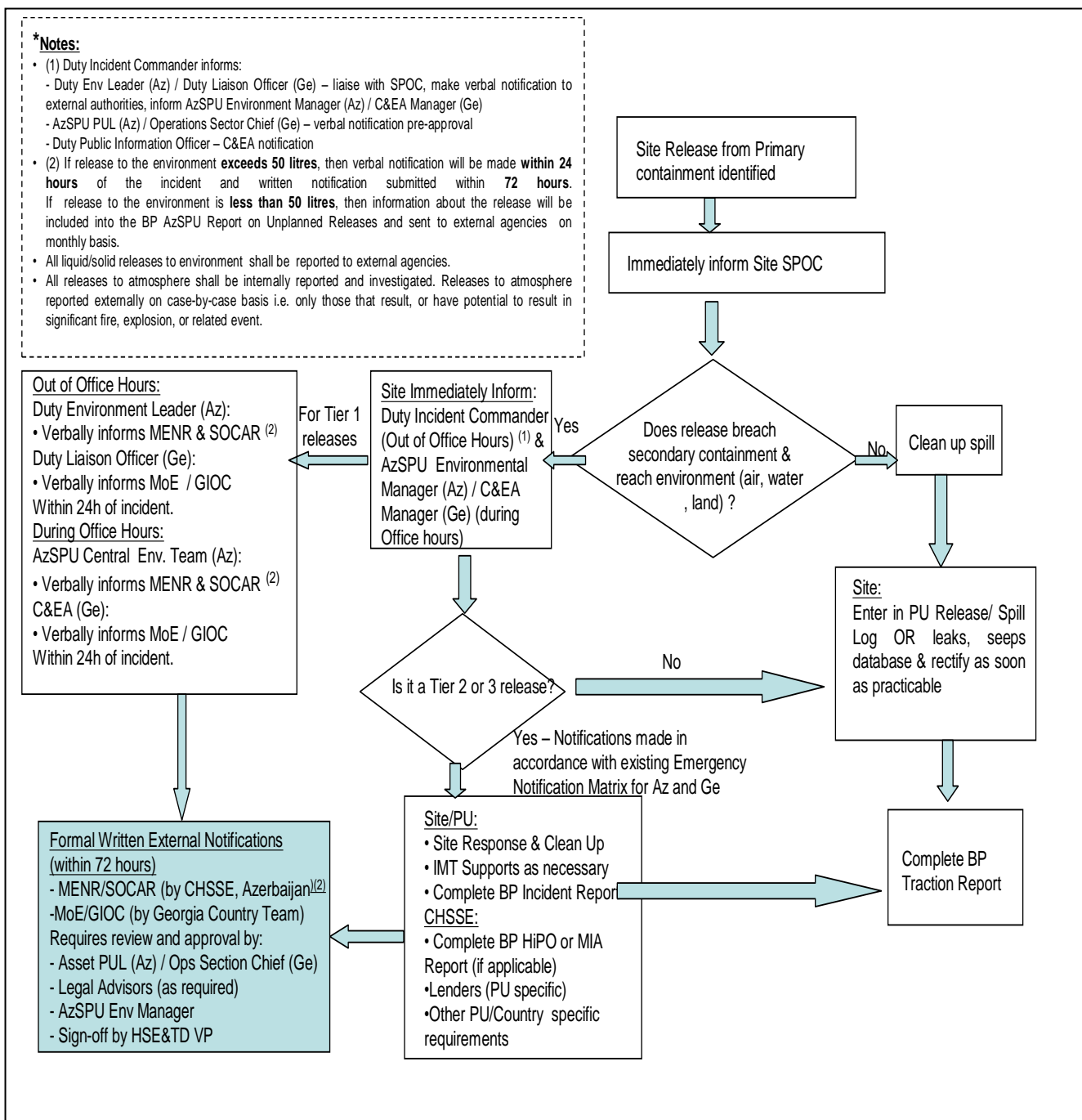
- Attachment A – Internal & External Material Release Reporting Flowchart
- Attachment B – BP Material Release / Spill Notification Form
- BP Traction Database
- Asset or facility specific spill response and contingency plans
- Az SPU Non-compliance and Corrective and Preventative Action Procedure (AzSPU-HSE-DOC-0040-2).
- WREP Azerbaijan Emergency Response Plan (AzSPU-HSE-DOC-00021-5).
- WREP Georgia Emergency Response Plan (AzSPU-HSE-DOC-00360-5).
- AzSPU Records Control Procedure (AzSPU-HSE-DOC-00041-2).
- IMS – Incident Management System (AZSPU-HSE-DOC-00087-2).

## Revision Log

Revision Date	Authority	Custodian	Revision Details
Oct, 2007	AzSPU Environmental Manager	AzSPU HSE External Relations Officer	Annual review
September, 2008	AzSPU Environmental Manager	AzSPU Senior Environmental Advisor	Offshore PU proposed changes to the “AzSPU Internal & External Material Release Reporting & Notification Procedure” which will help to ensure that a notification on environmental releases (more than 50 liters) is timely provided to required external parties <u>outwith normal office hours</u> (holidays, weekends, etc.).
February, 2009	AzSPU Environmental Manager	AzSPU Senior Environmental Advisor	Minor changes – next review date extended
19 November	AzSPU	AzSPU Senior	The Next Revision date has

2009	Environmental Manager	Environmental Advisor	been changed to 31 January 2010 in accordance with the document Custodian request
04 May 2010	AzSPU Environmental Manager	AzSPU Senior Environmental Advisor	Document reviewed and no changes required. Next Revision date changed to 04 September 2010.
18 October 2010	AzSPU Regulatory Compliance and Environment Manager	AzSPU Environmental Permitting Specialist	Updated LWS definition. Attachment B of the procedure was updated with the new contact details of MENR and SOCAR. Next revision date changed to 28 <sup>th</sup> February, 2010



**Attachment A: Internal & External Material Release Reporting Flowchart**

**Attachment B: Material Release / Spill Verbal Notification Log**

<b>Report No.</b> (As recorded in Material Release/Spill Notification Log) Filled by CHSE Env Team		
<b>Incident date and time:</b>		
<b>Description:</b>	To include (if confirmed); cause of release, material released, an approximate indication of volume and status (e.g. contained).	
<b>Location:</b>	Name of Asset/Facility and stating if the spill is to water or land.	
<b>Mitigation measures:</b>	Describe the actions taken thus far.	
<b>Actions planned:</b>	Including next communication/reporting to regulator.	
<b>Spill Review (Y/N):</b>	Justification to be provided if not.	
<b>Company contact:</b>	Contact name provided in correspondence with the regulator	
<b>Title</b>	<b>Date</b>	<b>Signature</b>
PU/Asset Manager		
AzSPU Regulatory Compliance and Environment Manager		
Legal Advisor		
HSE & Eng VP or delegate		
<b>Amendments/additional information provided:</b>	To include amended/additional information provided to the regulator(s) following completion of the incident investigation report (if applicable) e.g. volume of unrecovered material, preventative actions etc.	

Notification status			
Date & Time	Name/Position of Notifier	Who should be notified	Comments
	BP AzSPU SPC for environmental external relations (during office hours)/Duty Environment Leader(Out of office hours)	<b>MENR</b> Director of the Department for Environment Protection Contact phones: 439 67 87/ 438 71 81/ 050 513 30 78  Head of Caspian Complex Environmental Monitoring Administration (CEMA) Contact phones: 3713901 / 0504756700  SOCAR  Deputy Director of	

		Environmental Major Projects Department 5210340/0503209418	
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**EXAMPLE****INCIDENT NOTIFICATION****(Verbal Notification)**

<b>Report No. 26</b>			
<b>Incident date and time:</b>		08/08/2010, 03:00	
<b>Description:</b>		Internal plate in bookcell has burned out  When commencing the job of weekly bookcell cleaning, it was found out, that one of the bookcell plates burned out. The system was isolated to replace the bookcell and therefore raw sewage had to be drained through the surge tank to the sea. The bookcell has been replaced and system was back online.	
<b>Location:</b>		East Azeri Platform, spill to sea.	
<b>Mitigation measures:</b>		Maintenance interventions will be made to relief the problem and reduce the level of effluent in withholding tank.	
<b>Actions planned:</b>		Including next communication/reporting to regulator.	
<b>Spill Review (Y/N):</b>		n/a	
<b>Company contact:</b>		Saadat Gaffarova/Faig Askerov	
<b>Title</b>	<b>Date</b>	<b>Signature/e-mail approval</b>	
<b>PU/Asset Manager</b> AZERI OA Delivery Manager Trevor Barker	23 June 2010	E-mail approval is available	
AZSPU Regulatory Compliance and Environment Manager Faig Askerov	23 June 2010	E-mail approval is available	
<b>Legal Advisor</b> Saïda Ibrahimova	23 June 2010	Informed through Cc of correspondents	
<b>Amendments/additional information provided:</b>	<i>To include amended/additional information provided to the regulator(s) following completion of the incident investigation report (if applicable) e.g. volume of unrecovered material, preventative actions etc.</i>		
<b>Notification status</b>			
<b>Date &amp; Time</b>	<b>Name/Position of Notifier</b>	<b>Who notified</b>	<b>Comments</b>
23 June, 2010	Saadet Gaffarova, Environmental	MENR Khaliqverdi Huseinov,	

At 2.00 pm	Permitting Specialist	Director of the Department for Environment Protection, 439 67 87/ 438 71 81/ 050 513 30 78	The message provided through his assisstant of the head of Department/4396787
At 2.10 pm		Panah Hidayatov, Acting Head of CCEMA 3713901 / 0504756700	
At 2.20 pm			
At 2.30 pm		SOCAR Agamahmud Sirajov, Deputy Director of Env. Major Projects Department 5210340/0503209418	