

CEDRE'S TRAINING ACTIVITIES

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CEDRE (Centre de Documentation, de Recherche et d'Expérimentations sur les pollutions accidentelles des eaux) provides various types of training:

- National courses,
- Community courses, and
- Private courses.

The national courses are intended for the people in charge of pollution response at sea, on the shoreline, or in inland waters. They are attended by officers of the Navy, harbor representatives, and officers of the fire brigades.

CEDRE has conducted eight community courses, which emphasize

either pollution by oil or pollution by harmful substances. They are intended for pollution response managers from the countries of the European Economic Community. The lectures are given in French or in English.

Private companies, more and more concerned with pollution, ask CEDRE to give their personnel the necessary knowledge for responding to spills. That is the case for the refineries, port authorities, oil terminals, maritime transport companies, oil spill response centers, and others.

All of these courses are both theoretical and practical.

ENFORCEMENT JURISDICTION OF POLLUTION PREVENTION REQUIREMENTS FOR OIL TRANSFER PIPELINES

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A 1991 study by the General Accounting Office has identified a gap in the enforcement of pollution prevention regulations for petroleum pipelines. This gap seems to be the result of confusion in the jurisdictional boundaries of the regulatory agencies concerned with preventing pollution from pipelines. Delineation of boundaries often becomes confusing due to the complexity of piping systems and the diversity of regulations enforced by the federal regulatory agencies. This confusion underscores the need for clarification of jurisdictional boundaries.

Pollution prevention for petroleum pipelines is the responsibility of four federal regulatory agencies; the U.S. Coast Guard, the U.S. Environmental Protection Agency, the Office of Pipeline Safety (U.S. Department of Transportation), and the Minerals Management Service (U.S. Department of the Interior). Each agency has responsibility for specific portions of a pipeline, however, some overlap does exist. The diagram in Figure 1 will serve to clarify the jurisdictional boundaries of all the regulatory agencies concerned with pollution from pipelines and as a result will eliminate confusion in the marine industry and enhance the enforcement of pollution prevention programs.

Transportation related onshore pipelines from marine terminals have traditionally been the responsibility of the U.S. Coast Guard. Coast Guard jurisdiction covers the section of a pipeline extending

from the loading arm at the dock to the first valve within the containment berm, which is included in the Environmental Protection Agency's Spill Prevention Control and Countermeasures (SPCC) plan. Pipelines under Coast Guard jurisdiction are typically used to transfer oil in bulk to or from vessels.

Onshore nontransportation-related, intrafacility pipelines are the responsibility of the Environmental Protection Agency. Generally, they include pipelines which are within the SPCC containment berm and are used to transport product exclusively within a nontransportation-related facility.

Onshore transportation and nontransportation-related pipelines, other than those within nontransportation-related facilities, are the responsibility of the Office of Pipeline Safety, in the Research and Special Programs Administration of the Department of Transportation. This jurisdiction applies to all pipelines including those used to transport products in interstate and intrastate commerce.

Offshore transportation and nontransportation-related pipelines associated with offshore drilling and production are subject to joint jurisdiction of the Minerals Management Service and the Office of Pipeline Safety. Jurisdiction in this case varies, depending on the applicability of several federal laws.