

International Association of Drilling Contractors



HSE Environmental Subcommittee Meeting
15 October 2014
IADC
10370 Richmond Ave., Suite 760
Houston, TX 77042

Minutes

Agenda Item #1: Welcome, Introductions, Facility Orientation, and IADC Anti-Trust Guidelines

The IADC HSE Environmental Sub-Committee was called to order by Travis Warden, Paragon Offshore, and Sub-Committee Chairman. Travis welcomed everyone and thanked them for attending. Mr. Warden then asked everyone to introduce themselves, see the attached attendance sheet.

Paul Breaux, IADC, provided attendees with building and emergency response information. Mr. Breaux reviewed the IADC Anti-trust Policy & Guidelines, calling attention to prohibited discussion topics. For a copy of the IADC Anti-trust Policy & Guidelines refer to <http://www.iadc.org/iadc-antitrust-policy-guidelines/>.

Agenda Item #2: General Discussion – Incident Sharing – Best Practices

The group discussed the 2016 Ballast Water Discharge Standard, regarding if all rigs are going to be required to have ballast water treatment systems on the rig and what is meant by “waters of the United States”.

A member informed the group of changes made to monitoring for exotic and endangered species in the Gulf of Mexico. Now you are supposed to look for Lion Fish.

Right now, everything in Washington is at a standstill until after midterm elections and Presidential election in two years. Environmentally, nothing new is on the radar; the results of the elections will be driving factor in what happens the next two years.

Agenda Item #3: Regulatory Reports

John Pertgen, IADC, reported:

- IADC publishes two semi-annual reports:
 - International Standard Activities affecting the Offshore Oil and Gas Industries
 - This report provides a handy reference to the standards development activities of various organizations (e.g., the International Maritime Organization, International Labor Organization, the International Organization for Standardization, and various international trade associations).
 - Federal Regulatory Actions Impacting the Offshore Industry
 - This report provides a reference summary that reflects the regulatory actions, announced in the Federal register by U.S. governmental agencies, which may affect operations in the oil and gas industry.

International Association of Drilling Contractors

Note: Both reports are available at [IADC Offshore Regulatory Reports](#).

If you would like to receive the Offshore notices, contact John Pertgen at John.Pertgen@iadc.org.

The following changes are highlights of the federal summary that Mr. Pertgen covered during the meeting.

DHS / U.S. Coast Guard

Proposed Rule Consumer Price Index Adjustments of OPA 90 Limits of Liability—Vessels, Deepwater Ports and Onshore Facilities On August 19, 2014, the USCG published a FRN proposing to increase the limits of liability for vessels, deepwater ports, and onshore facilities, under the Oil Pollution Act of 1990, as amended (OPA 90), to reflect significant increases in the Consumer Price Index (CPI). According to the notice, they are also proposing a simplified regulatory procedure for the Coast Guard to make future required periodic CPI increases to the OPA 90 limits of liability for vessels, deepwater ports, and onshore facilities. These regulatory inflation increases to the limits of liability are required by OPA 90, and are necessary to preserve the deterrent effect and “polluter pays” principle embodied in OPA 90. Finally, they are proposing language to clarify applicability of the OPA 90 vessel limits of liability to two categories of tank vessels, edible oil cargo tank vessels and tank vessels designated as oil spill response vessels. This clarification to the existing regulatory text is needed for consistency with OPA 90. Comments are due on or before October 20, 2014. API will not file comments.

IADC plans to submit comments on this rulemaking as it fails to include the MODU exception stated in the preamble of the final (interim) rule.

Training of Personnel and Manning on Mobile Offshore Units and Offshore Supply Vessels Engaged in U.S. Outer Continental Shelf Activities. (USCG-2013-0175) (RIN 1625-AC10; 33 CFR 140 thru 147 and 46 CFR 10 thru 15) On 14 April 2014 ([79 FR 20844](#)) the USCG issued an ANPRM wherein they propose to expand its maritime safety training requirements to cover all persons other than crew working on OSVs and MOUs engaged in activities on the US OCS, regardless of flag. Their reasoning is to enhance personnel preparedness for responding to emergencies. They are requesting comments on:

1. Sufficiency of existing maritime safety training and the value of additional maritime safety training for persons other than the crew
2. MOU's safety organizational structure (defining levels of authority and lines of communication)
3. Professional education and service requirements for industrial officers on MOUs
4. Sufficiency of manning regulations on MOUs and OSVs
5. Available economic data on current labor market trends and conditions, as well as the current costs, benefits, and effectiveness of mandated maritime safety training courses and programs for persons other than the crew.

Comment due date 14 July 2014.

On 9 July 2014 ([79 FR 38841](#)) the USCG issued an extension to the comment period. New comment due date: 8 September 2014.

[On 5 September 2014 IADC submitted [comments](#) on this notice]

DOT / Pipeline and Hazardous Materials Safety Administration (PHMSA)

International Association of Drilling Contractors

Hazardous Materials: Revisions of the Emergency Response Handbook (PHMSA-2014-0099) (RIN not listed); CFR not listed). On 2 September 2014 (79 FR 52106) PHMSA issued a notice with a request for comments regarding any interests in revising the Emergency Response Guidebook (ERG) as they develop the 2016 version (ERG 2016). The ERG is for use by emergency response personnel, who provide initial response to hazmat incidents. This group will include agencies in the US, Canada and Mexico. Point-of-contact is Suzette Paes at (202) 366-4900 or suzette.paes@dot.gov.

Hazardous Materials: Harmonization with International Standards (RRR) (PHMSA-2013-0260) (RIN 2137-AF05; 49 CFR 171, 172, 173, 175, 176, 178 and 180). On 25 August 2014 ([79 FR 50741](#)) PHMSA issued an NPRM that proposes to amend the HAZMAT regulations to align them with the international standards by incorporating various amendments. This includes changes to proper shipping names, hazard classes, packing groups, special provisions, packaging authorizations, air transport quality limitations, and vessel storage requirements. Once finalized, the US HAZMAT regulations will be harmonized with the International Maritime Dangerous Goods (IMDG) Code, the International Civil Aviation Organization's (ICAO) Technical Instructions for Safe Transport of dangerous Good by Air, and the United Nations (UN) Recommendations on the Transport of Dangerous Goods – Model Regulations. Comment due date: 24 October 2014

EPA – Toxic Substances Control Act

Hydraulic Fracturing Chemicals; Chemical Information Reporting under TSCA section 8(a) and Health and Safety data Reporting under TSCA section 8(d) (RIN 2070-AJ93; 40 CFR 712 and 716). The recent Unified Agenda indicated that the EPA is considering plans to initiate a proposed rulemaking under TSCA sections 8 (a) & (d) to obtain data on chemical substances and mixtures used in hydraulic fracturing. Although the EPA granted the petitioners' request to initiate a rulemaking, the agency is not committing to a specific outcome. EPA tends to first develop an ANPRM and initiate a stakeholder process to provide input on the design and scope of the TSCA reporting requirements that would be included in a proposed rule.

On 19 May 2014 the EPA issued an ANPRM to develop an approach to obtain info on chemical substances and mixtures used in hydraulic fracturing. Comment due date: 18 August 2014.

On 14 July 2014 EPA issued an extension ([79 FR 40703](#)) to the ANPRM's comment due date. New comment due date: 18 September 2014

EPA – Clean Water Act (CWA) and Oil Pollution Act (OPA)

Re-proposal of an NPDES General Permit for Oil and Gas Geotechnical Surveying and Related Activities in Federal Waters of the Beaufort and Chukchi Seas. (RIN: not listed; CFR: not listed) On 15 August 2014 ([79 FR 48147](#)) the EPA issued a Notice of re-proposal of general permit, proposes their changes to the NPDES General Permit for Oil and Gas Geotechnical Surveying and Related Activities in Federal Waters of the Beaufort and Chukchi seas (AKG-28-4300). EPA is seeking comments on the following proposed changes:

- Inclusion of seasonal prohibitions on wastewater discharges specific to the 3 – 25 miles lease deferral area in the Chukchi Sea
- Clarification of drilling fluid testing requirements (Discharge 001)
- Clarification of Environmental Monitoring Program requirements and inclusion of language regarding pre-existing baseline data

International Association of Drilling Contractors

- Revision of sampling frequencies for fecal coliform and total residual chlorine (Sanitary Wastewater, Discharge 003)
- Clarification of Notice of Intent submission requirements.

Comment due date: 15 September 2014

Chemical Management and Permissible Exposure Limits (PELs) (OSHA-2012-0023)(RIN 1218-AC74; 29 CFR 1910, 1915, 1917, 1918, and 1926) On 10 October 2014 ([79 FR 61383](#)) OSHA issued a Request for Information . During their review of managing chemical exposures in the workplace, they decided to seek stakeholder input about more effective and efficient approaches that would address the challenges found with the current regulatory approach. This request is concerned primarily with chemicals that cause adverse health effects from long-term occupational exposure. Comment due date: 8 April 2015.

Agenda Item #4: CO2 Emissions Benchmarking/Target Tool – Maurice Meehan, Maersk Drilling

Maurice Meehan, Maersk Drilling, gave a presentation, “Environmental Efficiency through Collaboration”. To view Mr. Meehan’s presentation, [click here](#).

Agenda Item #5: Technical Update on Environmentally Acceptable Lubricants and Cleaners – Mark Miller, RSC BioSolutions

Mark Miller, RSC BioSolutions gave a presentation, “Vessel General Permit (VGP) Compliance”. To view Mr. Miller’s presentation, [click here](#).

Agenda Item #6: Open Discussions & Future Meeting Topics

A member asked what the status is for the next IADC Environmental Conference. Per Leesa Teel, due to low attendance, there has not been any discussion for IADC to host an environmental conference. Leesa suggested that the sub-committee members should work to gather abstracts for a session at the IADC HSE&T Conferences. Leesa offered to speak to the group at the next sub-committee meeting and advise them of the issues/concerns of IADC hosting another environmental conference.

A draft copy of the Oil Record Book is now available on the USCG website.

A suggested future meeting topic was to have an IMCA representative speak about their Environmental KPI Policy vs. IADC’s and issues they have run into.

2015 Meeting Dates:

Q1	18 February
Q2	15 April
Q3	15 July
Q4	21 October

Members may submit suggested topics for the next meeting to Travis Warden, Paragon Offshore, twarden@paragonoffshore.com or to Leslie Packard, IADC, leslie.packard@iadc.org.

Meeting adjourned at 10:30 a.m.

International Association of Drilling Contractors

Attendance Sheet

Name		Company Name
Dustin	Campbell	ATWOOD
Robert	Boudreaux	COASTAL DRILLING COMPANY
Leonardo	Desousa	DIAMOND OFFSHORE
Ryan	Cox	DREW MARINE/ALEXANDER RYAN
Mark	Crelia	HELMERICH & PAYNE
Austin	Bear	HERCULES OFFSHORE
Paul	Breaux	IADC
Kristina	Hardwick	LLOYD'S REGISTER ENERGY
Eskild	Sorensen	MAERSK
Chris	Doremus	MAERSK
Charles	Birkner	MHWIRTH
Susan	Tybur	NOBLE DRILLING SERVICES
Marli	Thomas	PACIFIC DRILLING
Paramjit	Rai	PARAGON OFFSHORE
Travis	Warden	PARAGON OFFSHORE
Jesse	Hein	PATTERSON UTI
Christian	Lavallee	PRECISION
Heather	Myklebust	ROWAN COMPANIES
Mark	Miller	RSC BIO SOLUTION
Paula	Valderrama	WEATHERFORD
Kim	Ellis	WILD WELL
David	Votaw	WILLIAM JACOB MANAGEMENT