
Guidelines: Managing Offshore Decommissioning Waste

Summary

The ramp up in UKCS offshore decommissioning will lead to increasing quantities of waste arriving at UK disposal yards and ports. Currently there are no comprehensive guidelines for the management of this offshore decommissioning waste – a gap which these Guidelines by Decom North Sea and D3 Consulting Ltd. will fill.

There are two main outputs from the proposed Guidelines work:

1. An insert on 'Waste Management' into the BEIS Guidance Notes (Draft) for Decommissioning of Offshore Oil and Gas Installations and Pipelines (similar to the current section 12. Environmental Considerations); and,
2. Industry Guidelines on Managing Offshore Decommissioning Waste to support industry compliance with the various regulatory requirements.

Background

It is acknowledged that there is increasing activity in offshore decommissioning with a potential 300 offshore installations likely to enter Decommissioning in the next 10 years. This will bring significant quantities of waste to shore (approximately 600,000 tonnes) where challenges will lie handling these often complex wastes, i.e. NORM, mercury and asbestos. Furthermore, the transboundary shipment of wastes across the North Sea basin is a complex process that requires accurate definition of the wastes and appropriate handling.

Taking into account these increasing challenges for the industry and the regulators, Decom North Sea (DNS) and D3 Consulting Ltd. (a DNS member) are preparing the Industry Guidelines for Managing Offshore Decommissioning Waste and offering to develop the 'Waste Management' insert into the BEIS Guidance Notes (Draft). The development of the 'Waste Management' insert will be at no cost.

D3 Consulting has offered to develop the deliverables based on D3's already developed Waste Management guidelines for the L2P2 portal and extensive experience in managing decommissioning waste from more than 40 North Sea offshore platforms both completed and scheduled for decommissioning.

Guidelines

It is envisaged that the Guidelines will ensure that the Operators and their supply chain understand the key requirements and scope of waste management arising out of offshore decommissioning, from Cessation of Production (CoP) all the way through to delivery at the quayside and beyond into the 'common waste stream'. Furthermore, the Guidelines encompass all inventory that is scheduled for transport to non-UK destinations via a Transboundary Shipment process.

The SEPA and EA "5 Principles" of managing offshore decommissioning waste (ref.: Section 9. "Treating, keeping and disposing of waste" of the BEIS Guidance Notes) will be a key focus for the Guidelines.

Since there is currently a lack of clear guidance on these activities, there is a need to bring clarity and structure to the waste management of offshore decommissioning such that when the waste and materials do arrive to shore, the description and management of that waste is aligned with the permitted onshore activities.

A successful completion of this development process for the Guidelines will entail a set of clear, constructive and applicable set of guidance for managing offshore decommissioning wastes in the UKCS, which are widely disseminated and adopted across the UK offshore decommissioning industry. The result of this will be improved and regulatory compliant waste management from offshore decommissioning which will contribute to safer working practices (by ensuring human health is protected when dealing with wastes), cost reductions (by facilitating more efficient waste and materials handling and management) and reduced risk to the environment (by correct waste and materials handling and treatment).

Process

The following process is envisaged for the development of the guidelines:

1. DNS/D3 will present the Guidelines and “Waste Management insert” at the 2nd Oil & Gas Decommissioning Regulators meeting the 25th of January 2018 for feedback and ultimately approval before progressing to the drafting of the Guidelines;
2. A Decom North Sea / D3 review session to assess progress and key feedback/findings on the development of the Guidelines;
3. Once scope has been agreed with the relevant Regulatory bodies, the first draft of the Guidelines will be developed and presented at a Regulator engagement session with subsequent key Industry participants to review and validate the Guidelines developed to date;
4. Presentation of the draft Guidelines at the Decom North Sea Waste Technical Workshop planned for the 5th of March 2018. The draft Guidelines will be disseminated to participants (industry participants) prior to the workshop for their comments to be discussed at the workshop;
5. Following the March workshop, the final draft of the Guidelines will be developed in line with the April 2018 issue of the BEIS offshore decommissioning guidelines;
6. A Decom North Sea / D3 review session to assess progress and key feedback/findings on the development of the Guidelines; and,
7. Aim being to launch the “Managing Offshore Decommissioning Waste Guidelines” at the Decom North Sea conference on the 23rd May 2018 with a presentation.

The development of the guidelines will include wide consultation with industry across the supply chain of Operators, Tier 1 contractors and subcontractors being involved. The relevant regulatory bodies for the North Sea basin countries will also be consulted and liaised with on the development of the Guidelines for their input.

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