

# Guidelines: Offshore Decommissioning Waste Management



D3 Consulting Ltd

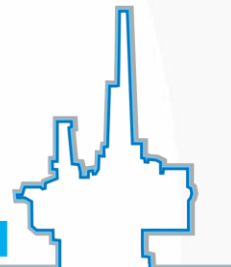


## Scope of Guidelines

- ✓ All wastes and materials arising from offshore decommissioning activities
- ✓ From Cessation of Production\* to the “common waste stream”
- ✓ From UKCS to all destinations including TransFrontier Shipments

## Guidelines Objectives

- ✓ Bring consistency to managing offshore decommissioning wastes
- ✓ Share regulatory expectations for waste management – the “5 Principles”
- ✓ Ensure that the Operators and their supply chain understand the key requirements and scope of waste management arising out of offshore decommissioning
- ✓ Tie into the new BEIS Offshore Decommissioning Guidance Notes
- ✓ Bring clarity and structure to the waste management of offshore decommissioning
- ✓ Share best practice in management of offshore decommissioning waste





Guidelines apply from date of COP



Maritime & Coastguard Agency



TFS



Recycling Plant



Port



Crown Estate Scotland  
Oighreachd a' Chrùin Alba

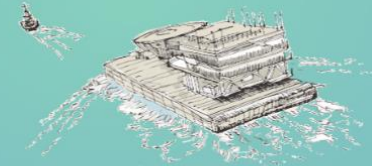


Smelting Plant



Port

THE CROWN ESTATE



12 MILE BOUNDARY



Landfill Site



Recycling Plant



Maritime & Coastguard Agency



Landfill Site



Port



Smelting Plant

Decommissioning Onshore

Decommissioning Over Water

Decommissioning Inshore



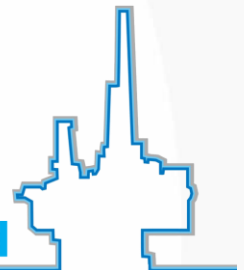
Developed by:



BP's own lessons learned from the decommissioning of NW Hutton in 2008 with the onshore disposal comprised:

- Not to underestimate **detailed understanding of waste** required in planning and through various project stages
- Have a **clear strategy for waste** quantification, removal, transportation and onshore management, jointly agreed by all parties
- Have **good document management and record maintenance** through installations lifetime, engineering down and cleaning phases
- Importance of **good communications and clear expectations**
  - Clear understanding and communication of regulatory requirements to all parties
  - Early and ongoing engagement with regulators
- Processes employed for waste quantification and management worked very well

From Caroline White of BP presentation titled "Waste Management for Offshore Decommissioning" presented at Decom North Sea Conference 2011.



## Human Health Risks

Trapped gas in valves, asbestos, residual oils and diesel, mercury and NORM

## Environmental Protection

Flora and fauna, marine and ground contamination, groundwater protection



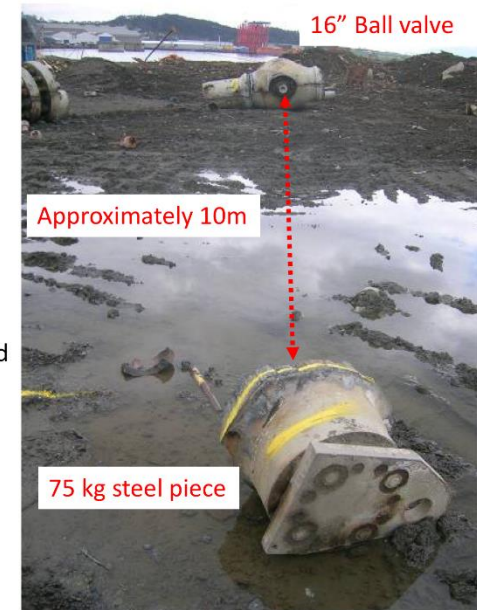
## Trapped gas

Valve housing blasted off during manual cutting with flame torch

The valve had internal pressure in the bearing housing, the main valve itself was open.

Trapped hydrocarbon gas in the housing was not ventilated and exploded when released and ignited by the torch.

Near miss



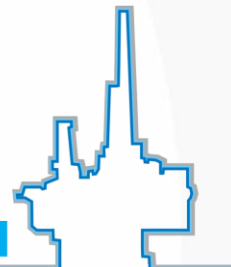
*Extract from Kjell Arne Stålevik, Kvaerner Stord "Inventory Mapping of Hazardous Materials" OH2016, Glasgow*

# The “5” Principles by SEPA and the EA:

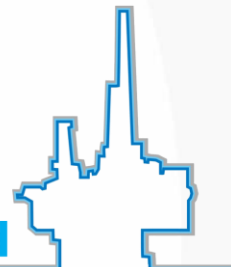
- Waste Framework Directive
- Duty of Care
- Early engagement with waste management industry
- Active Waste Management Plans
- Material Inventories

*Being adopted in current planning of 2 CNS gas platforms by D3 Consulting Ltd.*

- How clean is clean: To what level of cleanliness is necessary offshore?
- What is hazardous: The more we look and sample, the more we find
- Duty of Care: Need clarity on Duty of Care through the Supply Chain
- Health & Safety: Impact of waste management on H&S of personnel, human health risks and decommissioning approaches (i.e. moving into unmanned)
- How does waste management tie into new BEIS Guidance Notes, SCAP and other deliverables

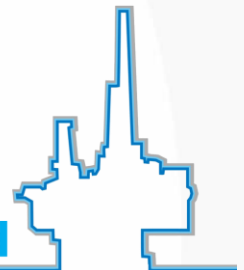


- Clarity on the TransFrontier Shipment process with what waste documentation and information is required and when
- NORM: difficult to assess quantities and readings offshore and often not until onshore during decontamination will we know
- Radioactive waste must be returned to the UK for disposal
- Operators want to know who to engage with early at SEPA and EA during the Decommissioning Programme process



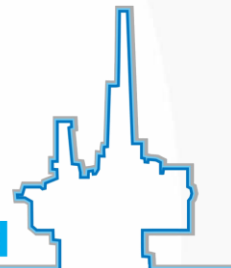


- Kick off January 2018
- Regulatory meetings (Jan, March, onwards)
- 1<sup>st</sup> Industry workshop with DNS members (March)
- 1<sup>st</sup> Draft of Guidelines issued at “Decom Offshore 2018” Conference 23<sup>rd</sup> May 2018
- 2<sup>nd</sup> Industry Workshops planned for June and July 2018
- Finalise Guidelines September 2018
- Guidelines remain live and updated....





- Available to download from the Decom North Sea website



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