

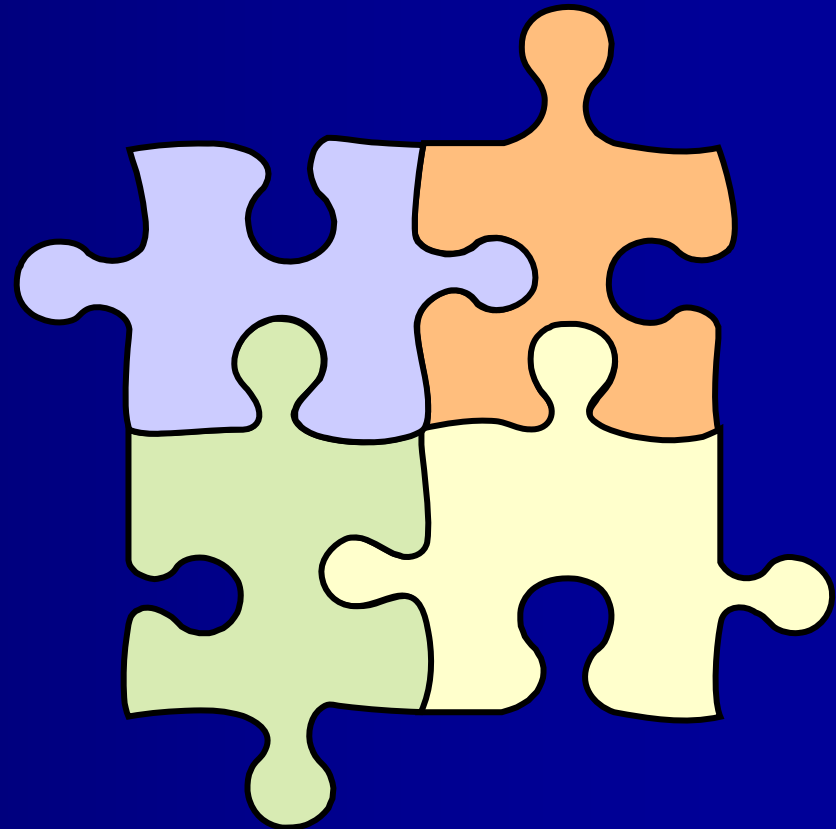
Monitoring Discharges from Offshore Oil and Gas Platforms: Twenty Years of a Partnership

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TOPICS

- THE CAUSE
- THE NEED
- COOPERATION
- CHALLENGES
- CHANGES
- RESULTS
- CONCLUSIONS



THE CAUSE

- 25 YEARS AGO ON PLATFORM GRACE



THE CAUSE

- DIFFICULTY MEETING THE REQUIREMENTS OF THE NPDES PERMIT
- TOOK SHORTCUTS
- WHISTLEBLOWER BLOWS THE WHISTLE TO EPA

THE NEED

- EPA REALIZED A NEED
 - NPDES PROGRAM IS SELF-POLICING
 - ENFORCEMENT IS A CHALLENGE, PARTICULARLY OFFSHORE
 - WHAT FEDERAL AGENCY ALREADY HAS A PRESENCE ON THE OFFSHORE OIL PLATFORMS?

COOPERATION

- . . . MINERALS MANAGEMENT SERVICE
- OUR MISSION . . .
 - To oversee the responsible, safe, and environmentally sound leasing, exploration, development, and production, of crude oil and natural gas from offshore oil and gas platforms in Federal waters

COOPERATION

- MMS HAS:
 - INSPECTORS OFFSHORE EVERY DAY
 - KNOWLEDGE OF THE FACILITIES
 - EXPERTS IN ENGINEERING, WATER QUALITY, AND MARINE BIOLOGY

COOPERATION

- MEMORANDUM OF UNDERSTANDING
 - 1984 between DOI and EPA
- MEMORANDUM OF AGREEMENT
 - 1989 between MMS's Pacific Region and EPA's Region 9
- ANNUAL WORKPLANS

COOPERATION

■ SAMPLING



COOPERATION

- INSPECTIONS
 - PERMIT-SPECIFIC FORM
 - EXAMINE THE FACILITY
 - LOOK FOR NPDES VIOLATIONS
 - LOOK FOR MMS VIOLATIONS
 - ASK QUESTIONS



CHALLENGES

- LOGISTICS

- TRANSPORTATION TO THE FACILITIES

- BOAT



- HELICOPTER



CHALLENGES

- LOGISTICS

- SHORT HOLD TIMES FOR SOME ANALYTICAL PARAMETERS

- WEATHER

- FOG – CAN'T FLY

- WIND/WAVES – CAN'T TRANSFER FROM BOAT TO PLATFORMS (and back!)

CHANGES

	20 YEARS AGO	NOW
# PLATFORMS	21	23
#PLAT. DISCHARG. PRODUCED WATER	7	12
# PERMITS (General)	8 (7 Individual)	1

CHANGES

	20 YEARS AGO	NOW
# Analytes	1 (oil and grease)	25
# Sample cont.	1 (liter)	11 (6+ liters)
ANALYTES		
Oil and grease	72 ppm	42/29 ppm
PAHs	None	BTEX, others
Toxicity	None	Red abalone

RESULTS

- COMPLIANCE – Have we found anything?
- Answer – Yes, but not very many
- Oil and Grease
 - Operators have reported 7 exceedances
 - MMS sampling has detected 3 exceedances
 - One MMS sample was below the limit while the duplicate operator sample indicated an exceedance
- Toxicity: 4 indications of toxicity

RESULTS

USES OF 20 YEARS OF DATA

- Excel spreadsheet contains data from
 - Discharge Monitoring Reports from operators
 - Compliance sampling by MMS inspectors
- Spreadsheet data shows
 - Yearly sums and averages
 - Running overall sums and averages
 - Calculate trends, mass emissions, other statistics

RESULTS

USES OF 20 YEARS OF DATA

- Support NEPA documents
- Provide comparisons with onshore sources of pollution (e.g., mercury)
- Data source for the latest Oil in the Sea analysis

CONCLUSIONS

- MMS and EPA have cooperated for 20 years
- Benefits:
 - MMS acquired and used discharge data
 - EPA was assisted in determining compliance with NPDES permits
 - Environment benefited through a long-term cooperation between agencies

QUESTIONS?

