

Maintenance Committee 10 April 2019

IADC Update

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Items of Interest

- U. S. Coast Guard's Withdrawal of 33 CFR Sub N NPRM
- Update on the BSEE Well Control Rule (WCR 2.0)
- Best Available & Safest Technology
- Jones Act Applicability
- API RP 75
- IMO
 - Development of Industrial Personnel Code
 - Onboard Lifting Appliance & Winches (OLAW)
 - 2020 low Sulphur Fuel developments

Withdrawal of 33 CFR Sub N NPRM

- **Since the September 19 Federal Register Notice:**
 - **IADC remains ready to assist any efforts to further address offshore compliance issues/concerns**

WCR 2.0 – *There to here*

- **May 2017 – Joint trades express concerns related to “WCR 1.0”**
- **December 2017 – Joint trades received by OIRA for further “supplementary discussion”**
- **May 2018 – BSEE publishes NPRM WCR 2.0**
- **August 6, 2018 – Joint trades submit comments on WCR 2.0 along with the other 46,812 commenters**
- **October 15, 2018 – Joint trades hold teleconference on further comment consideration with final rule expected Q1 2019.**
- **February 13, 2019 – API, OOC, IADC, and associated trades members met with the Office of Information and Regulatory Affairs to make one final expression of concern that WCR 2.0 results in a desirable final rule**

Best Available & Safest Technology – *What is that exactly?*

- **BSEE Regulation 30 CFR 250.107 – What must I do to protect health, safety, property, and the environment?**

(c)(1) “....you must use the best available and safest technologies (BAST) which the Director determines to be economically feasible whenever the Director determines that failure of equipment would have a significant effect on safety, health, or the environment....”

- **Director Angelle’s request for industry assistance in making his determination(s)**
- **Timelines and implications**
 - Feedback was provided to the Director by November 13
 - Deliverable is a list of BAST Candidate Equipment

Jones Act...*the continuing saga*

- **January 2017 - CBP issues a Federal Register notice of proposed modification/revocation of its Jones Act letter rulings**
- **May 2017 – CBP Withdrew its 18 January notice**
- **November 2017 – Capt Paul Radtke/OMSA & Shipbuilders Council of America file suit against CBP**
- **October 2018 – suit settlement discussions fail**
- **November 14 – IADC met with CBP officials in Washington to explain implications of Jones Act applicability to certain offshore activities**
- **February 13, 2019 – IADC met with CBP for further discussion**

API RP 75

- **API RP 75 *Recommended Practice for Development of a Safety and Environmental Management Program for Offshore Operations and Facilities***
 - **Scope expanding to all companies, not just operators – all operations, not just production**
 - **Scaled to big and small companies**
 - **RP moving to Performance-Based vs. Prescriptive**
 - **Focus on systems thinking and risk management via a management system**

API RP 75 (cont.)

- **Enhancements:**
 - **Role of Leadership**
 - **Human Performance**
 - **Managing SEMS Interfaces between Companies**
- **Work group lead is Center for Offshore Safety**
- **Work group currently resolving comments**
- **BSEE (both DC and Region) participating and weighing options to reference new edition**
- **RP 4th Edition expected to go for ballot late 2018-early 2019 – then publish in 2019**

SOLAS Industrial Personnel Developments

- **Provisions for a new SOLAS Chapter continue to develop along with a new Industrial Personnel Code (mandatory)**
 - **Key consideration is keeping IP and Offshore Worker definitions distinct**
 - **A.1079(28) *RECOMMENDATIONS FOR THE TRAINING AND CERTIFICATION OF PERSONNEL ON MOBILE OFFSHORE UNITS (MOUs)***
 - ***Looking down the road...modifying existing 46 CFR definition to “jibe” with SOLAS***

SOLAS Onboard Lifting Appliances & Winches

- **Provisions for a new SOLAS Chapter continue to develop along with a new OLAW Code (mandatory)**
 - **Key consideration is keeping MODU Code Chapter 12 apart from other developing provisions**
 - **At SSE 6, IADC Recommendations to the subcommittee were accepted into the draft SOLAS provisions**
 - **Ships subject to the MODU Code will be exempt**

MARPOL Low Sulphur Fuel Requirements

- **Implementation Guidance continues to be developed**
 - To be finalized at the MEPC 74 session the week of 13 May
 - Key point: MEPC 74/5/3 *Sulphur monitoring for 2018, Note by the Secretariat*
 - Distillate fuels averaged 0.07% Sulphur content
 - Residual fuel oil: 2.60% Sulphur content

Questions

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