

Chemical Safety Board Public Hearing:
Safety Performance Indicators

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Houston, TX

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My work at The Wilderness Society

- Ensure best possible performance for existing and future oil and gas operations in the Arctic and elsewhere
- Protect ecologically sensitive and subsistence use areas in the Arctic from new resource development



Background

- Represented the public on the U.S. DOT oil pipeline federal advisory committee from 1995-2007; now serving on the Bureau of Safety and Environmental Enforcement's Offshore Energy Safety Advisory Committee
- Provided invited testimony before the U.S. Congress on many occasions, most recently in May 2011 to the Senate Energy and Natural Resources Committee on New Developments in Upstream Oil and Gas Technologies
- Served as an advisor on the DOI Report to the President on the BP Gulf spill, May 2010
- Familiarity with both Alaska's Cook Inlet and Arctic oil and gas infrastructure, onshore and offshore
- Licensed engineer in Alaska, Maryland

Relevant Performance Measurement Work to Date

- Developed normalized environmental performance indicators for refining, vehicle manufacturing, and steel-making, enabling comparisons among companies and states (focusing on top/bottom 25% vs. middle 50%; used multiple indicators for the groupings)
- Data used covered ongoing emissions rather than accidents



Four Presentation Topics

1. Effective Industry Performance Indicator Criteria
2. Improved Data Collection Needs for Offshore Operations
3. Industry Standards Concerns
4. Federal Government Role



Effective Industry Performance Indicators

- Applicable for an industry sector with few exceptions
- Multiple, independent indicators preferred
- Encompass whole systems, i.e., do not ignore contractors or components not part of a regulator's jurisdiction
- Include operator performance data from overseas operations



Importance of Improved Data Collection for U.S. Offshore Oil/Gas Operations

Cannot measure performance without the necessary data. At a minimum:

- Need data on all gas releases
- Need verifiable and verified data on oil releases
- Need cement performance data
- Need near-miss data
- Need operator-specific, publicly-available data;
litigation will happen regardless



Industry Standards Concerns

- Developed by consensus which means they can be lowest common denominator
- Can be unenforceable (e.g., “should” rather than “shall”)
- Can contain gaps, sometimes intentionally
- Are often developed with little or no public or state input (generally because of budget constraints)
- Not all standards are publicly available for free



Federal Government Role

- Need to use the data collected for accident prevention as well as inspection/enforcement targeting
- Determine industry-wide, operator trends
- Use real-time data whenever possible to prevent accidents
- Report government performance to ensure consistency in inspection/enforcement (e.g., among regions), to focus permitting resources on highest-risk operations, etc.

