

Enhanced EEMS – Permit Chemical Aggregation

This note describes an improvement to the way in which the Enhanced EEMS will report the chemicals included on a PON15 permit, and the implications of this change, for consideration by interested parties.

Background

In order to have accurate reporting of the chemicals included on a PON15 permit, it is necessary to uniquely identify the chemicals. This is important over time, as the manufacturer and brand name of the chemical may change.

For this purpose, a regulator neutral identifier is assigned to each chemical. This is available from CEFAS as the “registration number”, and is present in EEMS labelled as “DTI ID”. However in this field EEMS has actually provided an internal chemical identifier from the UK Oil Portal, which is unique but may change over time for the same chemical.

One effect of this is that when a permit is varied to add another use of an existing chemical (over an extended period of time), it is possible for that chemical to be present with more than one name/manufacturer. EEMS would then require each variation of the chemical to be included in a report, whereas if the chemical had not changed then only a single line would be necessary to cover all uses of the chemical on the permit. Operator and third party systems would need to include these extra lines on the report for it to be accepted by EEMS.

Examples

The following examples show changes of name and manufacturer:

Internal ID [DTI ID]	Manufacturer	Chemical Name	Function Group	Chemical Label	HQ/CHS Ranking
22147 [3532]	Clariant Oil Services	MONOETHYLENE GLYCOL	Gas Hydrate Inhibitor	PLO	E
26321 [3532]	Clariant Oil Services	MONOETHYLENE GLYCOL (all dilutions)	Gas Hydrate Inhibitor	PLO	E
17538 [1372]	Champion Servo	Monoethylene Glycol	Gas Hydrate Inhibitor	PLO	E
23404 [1372]	Champion Technologies Ltd	Monoethylene Glycol	Gas Hydrate Inhibitor	PLO	E

Solution

In order to avoid these unnecessary report lines, the Enhanced EEMS will aggregate such chemicals. In doing so, the “DTI ID” field will be populated with the correct neutral value as identified by CEFAS, and each “DTI ID” will appear only once.

The rules for the other fields are as follows:

- Manufacturer and Chemical name. These will be taken from the most recent chemical variation that exists on the permit for the same DTI ID.
- Function group and Chemical label. These will be taken from the latest version of the chemical on the UK Oil Portal.
- The HQ/CHS ranking is no longer required to be reported, and will be set to a single hyphen in all cases.

For example:

DTI ID	Manufacturer	Chemical Name	Function Group	Chemical Label	HQ/CHS Ranking
3532	Clariant Oil Services	MONOETHYLENE GLYCOL (all dilutions)	Gas Hydrate Inhibitor	PLO	-
1372	Champion Technologies Ltd	Monoethylene Glycol	Gas Hydrate Inhibitor	PLO	-

This change will be effective in several places:

1. The permit chemicals web service. The contents of the "DTIId" element will change from previous results, as may the other fields. Where chemicals have changed over the life of the permit, the number of rows will also be reduced when compared to the current system.
2. Reports migrated from the current EEMS. These will be converted to show the correct DTI ID as part of the migration. Where there are multiple rows for the same chemical, usage values will be summed and any comments will be concatenated.
3. Corrections to previous reports. Any corrections to previous submissions that are made on the Enhanced EEMS but in the old format will be converted as above. This is to avoid extra work on the part of the operator / third party.

Conclusion

The change should therefore be transparent to most users. However, if any chemical information taken from the web service has been stored in local systems, this must be refreshed for new reports in order to avoid validation errors.