SLIDES: The STRONGER State Review Process: Draft Air Quality Guideline

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The STRONGER State Review Process
-Draft Air Quality Guideline

- Martz Summer Conference
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STRONGER

• STRONGER - State Review of Oil and Natural Gas Environmental Regulations, Inc.

• A multi-stakeholder collaborative effort formed in 1999 to:
  – Benchmark state regulatory programs
  – Develop recommended state program guidelines
  – Evaluate state regulatory programs against those guidelines
Guidelines

• Performance-based environmental objectives rather than specific numerical criteria
• Recognize differences in geology, topography, climate, hydrology, economics, methods of operation, laws and regulatory history
IOGCC State Review Concept

• Established by IOGCC with support from EPA
• Stakeholder involvement
• Voluntary reviews
• Initial review to benchmark of state program
• A written report including findings and recommendations was developed
• 12 states reviewed against Guidelines
Updated and revised the 1990 Guidelines
Expanded to include naturally occurring radioactive material and abandoned wells
Included EPA clarification of exemption for certain associated wastes
Completed in 1994
Follow-up state reviews begun
Five state programs received initial review and three states had follow-up reviews under 1994 guidelines – all states showed program improvements above benchmark levels
• Formed June 1999 to administer the program

• Functions:
  – Manage state review process
  – Sponsor new/revised guidelines
  – Develop procedures for reviews, training
  – Assemble review teams
  – Contract administrative/clerical support
  – Settle disputes
STRONGER

• Non-profit educational corporation
• Balanced stakeholder Board of Directors
  – 3 State regulators
  – 3 Industry representatives
  – 3 Environmental representatives
• Funding (EPA, DOE & API)
• Administrative services
State Reviews

- Initial Review
- Follow-up Review
- No Review

HF Hydraulic Fracture
Strengths of Review Process

• Work performed by stakeholder teams
• Guidelines recognize regional differences
• Review documents program strengths and opportunities for improvement
• Follow-up reviews evaluate implementation of recommendations and review program against more recently developed guidelines
• Process is transparent and timely
• Consensus is achieved
Results to Date

• 22 states reviewed – 94% onshore production
• 10 states with follow-up reviews – 76% of recommendations satisfied
• 2009 survey – all states implemented some recommendations
  – 33% fully implemented
  – 27% partially implemented
  – 26% outstanding
  – 14% unknown
Guidelines Updates

- 2005:
  - Spill Prevention & Performance Measures added to Administrative Criteria
  - Stormwater Management section added
- 2010:
  - Hydraulic Fracturing section added
- 2013:
  - Hydraulic Fracturing section revised
Guidelines Sections

• I. Introduction
• II. Scope of the Criteria
• III. General Criteria
• IV. Administrative Criteria
• V. Technical Criteria
• VI. Abandoned Well Sites
• VII. NORM
• VIII. Stormwater Management
• IX. Hydraulic Fracturing
• X. Air Quality (under development)
Section X - Air Quality (under development)

• Background

• Administrative Criteria
  – Scope of Authority
  – Jurisdiction and Cooperation Between Agencies
  – Permits, Authorizations and Exemptions
  – Compliance Monitoring, Demonstrations and Assurance
Air Quality (under development)(Cont.)

• Administrative Criteria (Cont.)
  – Enforcement
    • Enforcement Tools
    • Penalties
    • Right of Appeal
  – Staffing and Training
  – Data Management
  – Public Involvement
  – Outreach
  – Strategic Program and Resource Planning
Air Quality (under development)(Cont.)

- Air Program-Specific Elements
  - Delineation of Sources
  - Source-Specific Requirements
  - Air Quality Monitoring Networks
  - Reporting, Emissions Inventories & Recordkeeping
  - Corrective Actions & Emergency Response
  - Long-Term Planning, Prioritization & Evaluation
Current Status

• Stakeholder Work Group developed draft guideline in 2013
• Draft guideline put out for review in 1/2014
• Work Group is reviewing comments this month
• Joint meeting with the STRONGER board at the end of this month to finalize the guideline
• Adoption and use by STRONGER
For More Information

STRONGER website - www.strongerinc.org

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