

US EPA ARCHIVE DOCUMENT

**Louisiana Multimedia Oil and Gas Environmental Results Program
Progress Report
March 2008 - September 2008**

Project Synopsis

The Louisiana Environmental Results Program (ERP) underwent a change in project leadership during this time frame. The Louisiana Department of Environmental Quality (DEQ) Executive Staff desired that implementation of the work plan developed under previous leadership be conducted by personnel within the Office of Environmental Compliance (OEC) Surveillance Division (SD) due to the magnitude of work efforts the ERP work plan applied to that group. Efficiency was needed due to the competition for inspection resources the ERP work plan imposed upon the SD, therefore demanding careful integration of the ERP Baseline inspections into routine SD tasking by SD administrative and regional staff. A new Project Manager was installed and several internal DEQ representatives have changed. The new internal DEQ representatives are indicated below:

Office of Environmental Services

Heather Babin
Scott Guilliams
Bryan Johnston
Jim Davies
Kermit Wittenburg
Marcia Wittenburg
Scott Pierce

Office of the Secretary

Jeffrey Baker
Rodney Mallet
Tomeka Prioleau
Yanfu Zhao

Office of Environmental Compliance

Dirk Kavanagh
Dwight Bradshaw
Wayne Slater
Jane LaCour
Richard Ober
Cheryl Easley
Joette Kenaley

Project Manager

Chris Piehler

In addition to changes to the internal DEQ representatives, the work plan and QAPP were amended to reflect some adjustments and clarifications to approaches and roles necessary for

successful implementation of the ERP. The period covered by this progress report was consumed by these activities, i.e., internal DEQ representation restructuring, work plan revision, and QAPP revision.

Narrative Discussion

Implementation of the Louisiana ERP necessitated some adjustments to project design and internal DEQ representation. While the focus of the ERP revolves around compliance assistance, the demonstration of project effectiveness was dependent upon compliance data generated by staff within the Office of Environmental Compliance for baseline vs. post-outreach compliance rates. The amount of resources necessary for this aspect of the ERP project is very significant and requires integration of activities routinely performed by field staff. Complicating matters further, tasking of field staff increased greatly in the aftermath of two hurricane landfalls in Louisiana in the month of September 2008. These natural disaster events underscored the need for careful coordination of field staff task assignments. Replacing the project manager with a staff person within and familiar with OEC/SD activities facilitated this needed approach. It also helped identify existing knowledge of oil and gas exploration and production (E&P) within the OEC/SD staff important for project implementation and completion. This knowledge base includes familiarity with E&P procedures as compared to environmental requirements which will aid in the development of Environmental Business Process Indicators (EBPI) and best management practices (BMPs) for the purposes of inclusion in industry outreach materials.

Upon gaining familiarity with the ERP project, the new internal DEQ representation recognized a satisfactory approach to statistically comparing baseline vs. post-outreach compliance rates which eliminated the need to outsource statistics development by third party. This allowed project funding to be attributed to staff time spent on web-tool development and outreach documentation creation.

Project Table and Milestones

The following is a list of project tasks, descriptions, timelines and status. Start and end dates reflect calendar quarters.

Task	Description	Start Date	End Date	Status/Notes
Final Grant Proposal	LA will work in a cooperative fashion with EPA to refine and more fully develop a work plan as a first step after the grant is approved, and periodically throughout as milestones are met and reviewed.	7/10/2006, amendment begun 8/1/2008	Upon grant award; amendment end anticipated for following quarter	Finished. However, amendment to the work plan was initiated this quarter to clarify and complete based on changes to internal DEQ representation
Outreach	Outreach to internal and external stakeholders (including targeted facilities) about the project	Upon grant award	June 2009	Not started yet, but expect that stated end date will be correct
QAPP Submission	Development and submission of QAPP to EPA for approval	Upon grant award, revision initiated September 2008	60 days after grant award, amendment end anticipated for following quarter	Finished initial QAPP submission, amended QAPP under development
Facility Identification	Compile list of oil and gas facilities from reliable sources	December 2006	September 2008	Initial (baseline) list completed, post-outreach list to be developed after outreach and prior to initiating post-outreach inspections
Statistical Method	Finalize statistical method	September 2006	September 2008	Completed. New internal DEQ representation adequately trained to provide adequate statistical approach, no contract necessary
Data input and management	Data systems modifications and data input processes to cost effectively input and manage ERP inspection information	September 2006	To be finalized in quarter following this progress report (December 2008)	In progress, existing systems adequate to accept and retrieve data. Data input criteria under development.

Task	Description	Start Date	End Date	Status/Notes
Performance Tracking	Development of EBPIs and BMPs	September 2006	June 2009, in tandem with draft outreach material development	Underway, delayed due to resource constraints relative to hurricane recovery efforts.
Develop Inspection Forms	Multi-media inspection forms and training for inspectors	September 2006	June 2008	Complete. Use of existing forms deemed appropriate, training for inspectors occurred prior to initiating inspections, with ongoing trainer inputs
Outreach assistance materials	Develop workbooks, informational assistance materials, and workshop curriculum	September 2006	Draft by June 2009	Underway, delayed due to resource constraints relative to hurricane recovery efforts.
Baseline Inspections	Inspections at facilities to establish baseline compliance rates for performance measures	June 2008	March 2009	Underway, delayed due to resource constraints relative to hurricane recovery efforts.
Baseline assessment	Assessment of baseline inspection data to establish baseline compliance rates for performance measures	April 2009	June 2009	Dependent upon inspection completion, which has been delayed due to hurricane recovery efforts
Facility assistance	Delivery of compliance and technical assistance to industry in the form of the "Field Guide to Environmental Compliance for the Louisiana Oil and Gas Industry"	June 2009	December 2009	Dependent upon inspection completion, which has been delayed due to hurricane recovery efforts
Self-certification	Implementation of a voluntary facility self-certification approach	September 2006	Draft June 2009, final dependent upon industry input	Concept complete, software and outreach adjustments underway
Assessment of self-certification results	Assessment of self-certification data and identifying opportunities for randomized follow-up to determine effectiveness	June 2009	December 2009	Concept complete

Task	Description	Start Date	End Date	Status/Notes
Post-outreach inspections	Inspections at facilities to establish whether performance measures have changed since baseline inspections	December 2010	March 2011	
Data assessment	Assessment of baseline, self-certification, and post-outreach inspection data to quantify and report measured effectiveness of outreach tools and approaches	March 2011	June 2011	
Finalized ERP Outreach material availability	ERP documentation provided on website and in hard copy to interested parties	December 2009	March 2009	
Report to EPA	Final reporting on inspection findings, outreach effectiveness and tools and approaches associated with Louisiana Multi-media Oil and Gas ERP	June 2011	July 2011	

Financial Report

No expenditures were recorded during this period due to necessary changes and subsequent approvals needed for the ERP work plan and QAPP.