Stormwater Pollution Control and Regulation for O&G E&P

A presentation by the DWQ Stormwater Permitting Unit for

Stakeholders meeting,
convened by DWQ

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Our objectives today

- To provide beginning information about stormwater pollution;
- To provide basic information about stormwater control program models already being implemented in North Carolina;
- To provoke comments on how DWQ should regulate stormwater from O&G sites.

Various elements of pollution, site conditions, transport, and impact

1) Rainfall-driven flows
2) Sediment
3) Salts
4) Organics, from either down hole or surface activity
5) *Site conditions: initial grading; intense site development and fracking; low site activity production; site close out.*
6) *Site conditions: a succession of parties take possession of the site.*
7) *Site conditions: in some phases lots of personnel; in other phases not many at all.*
8) Velocity of transport can increase sediment load leaving the site; in-stream velocity increases can also erode the stream bank and bed.

Possible administrative models

1) The No Discharge model. *Not one drop leaves the site.*
2) Defer to DEMLR's E&S program.
3) Federal NPDES industrial stormwater program.
4) State analog of NPDES: a 'performance spec', i.e. we don't tell you what to build, just meet the numbers.
5) Expand the authority under 15A NCAC 2H .1000 to implement a coastal stormwater-type program: a 'methods and materials spec.' We tell you what stormwater BMP to build, to our standards, and we will assume that it works as intended. No monitoring.
6) Expand authority under 2H .1000 to institute an analog of the construction stormwater permit.
7) Whatever model is chosen, presumably setbacks, buffers, separation criteria, and water classification constraints would apply.

What they do in Pennsylvania

- **First substantive contact late last week. Second contact person identified and receptive.**
- **Recent DEMLR hire from Ohio may be helpful to us.**
- **Other suggestions of where you have seen successful programs?**
- **Please contact:**
  - **Ken Pickle, (919) 807-6376, ken.pickle@ncdenr.gov**
  - **Bradley Bennett, (919) 807-6378, bradley.bennett@ncdenr.gov**

What do we want the stormwater permitting program to do?

- **Require pro-active measures to prevent polluted discharges?**
- **Require periodic reporting to maintain site manager's awareness of stormwater pollution potential?**
- **Require self-monitoring?**
- **What level of policing by the regulators?**

Request for input

- **Now**
- **And later**
- **As far as you can tell now, are there any issues we have overlooked, or not given sufficient weight to, so far?**
- **What does your constituency want?**
- **What does your constituency not want to happen?**

END