Special thanks to review team members and observers, and to the management and staff of the state Class II UIC programs reviewed for their time and energy, and especially for their dedication to protecting the environment.
Purpose of GWPC Class II Peer Reviews

To review the effectiveness of state Class II UIC programs, cite program strengths and offer suggestions for possible improvements
EPA vs. GWPC Reviews

- Vast difference in approaches between EPA Regions
- EPA has focus on meeting primacy and workplan commitments
- For on-site reviews, EPA audits a sample of well files
- Conducted by regional EPA office staff

- Uniform approach regardless of state
- Focus is on effectiveness of program
- Not concerned with individual situations or cases
- Conducted by experienced state UIC program staff
GWPC Peer Reviews Goals

• Utilize standardized review criteria that assure states are reviewed based on common elements, rather than specific primacy conditions
• Assure reviews are conducted by experienced state UIC staff
• Raise public awareness of a state program’s accomplishments and challenges
• Provide states with an honest critique of their UIC program
GWPC Class II Peer Review Process

- State fills out detailed questionnaire (4 parts small program, 8 parts large program)
- State also submits applicable statutes, regulations, policies and other documents
- Team reviews material and drafts follow-up questions
- 1 to 2 day on-site visit to discuss submission and follow-up questions
- Team then drafts report, giving state opportunity to comment before final report is released
General Team makeup

- GWPC lead
- Review Facilitator
- At least 2 state peer reviewers from states outside the EPA Region of the state being reviewed
- EPA Region invited to send observer
- Environmental NGO invited to send observer
- Other observers invited by the state
• Part I: General Administrative Overview
• Part II: Permitting and File Review
• Part III: Well construction
• Part IV: Inspections
• Overall program findings
Reviewed States

- Utah 2015
- Nebraska 2016
- Ohio 2016
- West Virginia 2017
Cross-cutting Program Strengths

- Despite limited resources available in most states, UIC programs operate effectively
- Comprehensive technical reviews are conducted
- A strong field presence, which helps maintain compliance through inspections and witnessing MITs and other well actions, is maintained
- States are actively adopting or upgrading RBDMS which will streamline future actions
- Programs benefit greatly from senior staff/managers with many years experience
- Coordination with operators ensures timely and appropriate submissions
Cross-cutting Program Challenges

- Filling vacant positions and succession planning needs to be stressed since many senior staff/managers have retired or are near retirement.
- Need to place priority on implementation/upgrades to data systems such as RBDMS to assure continued success.
- Bond amounts are low in some cases (especially for blanket bonds).
- Grandfathered nonconventional wells without tubing and packer have not been completely eliminated.
- Administrative penalty authority is limited in some cases and may even require court action to be enforced.
Next Steps

- Finalize and publish the West Virginia review
- Seek out additional states willing to undertake a review
- Schedule at least 1 and as many as 2 reviews for 2018
- Look for volunteers from state UIC programs to act as team members
- Continue to refine the review process based on lessons learned from reviews already conducted