

Click here for
[DISCLAIMER](#)

Document starts on next page



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF ENFORCEMENT

MEMORANDUM

SUBJECT: Outer Continental Shelf Coordination
Committee

TO : Henry Longest
Deputy Assistant Administrator for
Water Program Operations (WH-546)

Steve Schatzow
Acting Deputy Assistant Administrator
for Water Planning and Standards (WH-551)

Allan Hirsh
Deputy Assistant Administrator for
Environmental Processes and Effects (RD-682)

Roy Gamse
Deputy Assistant Administrator for
Planning and Evaluation (PM-219)

William Hedeman
Office of Environmental Review (A-104)

James Rogers
Associate General Counsel
for Water Quality (A-131)

FROM : R. Sarah Compton
Deputy Assistant Administrator
for Water Enforcement (EN-335)

As you know, EPA has come under increasing attack recently for lack of coordination and lack of clear policies in the regulation of offshore oil and gas activities. These criticisms result from anxiety within the industry and the Departments of Interior and Energy concerning delays in permit issuance, overly restrictive conditions, and an apparent lack of coordination within the Agency. Congress and the White House have also taken an interest. Specifically, the following factors are involved:

- 1) delays in the commencement of exploratory operations in the

Flower Gardens and Santa Barbara; 2) lack of coordination between the "no discharge requirements" in NPDES permits and the designation of ocean dumping sites; 3) inconsistencies between the criteria used to issue permits in the NPDES and ocean dumping programs; 4) confusion over effects of and appropriate control mechanisms for drilling muds; and 5) inconsistencies between Regions in permit and environmental assessment requirements.

Over the past several weeks a series of meetings have been held in which many of you have been involved. At these meetings it became apparent that a central committee was needed to coordinate and provide direction for the many Agency activities related to regulation of the oil and gas industry on the Outer Continental Shelf (OCS). We agreed to form this committee and designate the Office of Water Enforcement as the lead office. I suggest we all serve as members of the committee and assign appropriate staff to coordinate the work and raise issues when necessary. In accordance with this format, I am designating Bill Jordan, Chief, Industrial Permits Branch, as staff chairman of the committee which has been dubbed the Outer Continental Shelf Coordination Committee. The purpose of the committee will be to coordinate policy issues and the various program office tasks relating to OCS oil and gas regulation to ensure consistency in Agency actions.

The OCS Coordination Committee will not supercede the responsibilities of the program offices but will provide coordination of OCS actions with the primary objective of consistent, well-supported, and expeditious NPDES permitting. For example, the Ocean Programs Branch will continue to oversee and coordinate technical studies (Drilling Mud Task Force, Flower Gardens Task Forces, etc.), ORD will be responsible for conducting studies on impacts and controls and should serve as the agency spokesman on the results of these studies, and the other program offices will be responsible for the individual tasks within their jurisdiction.

The committee will operate through subcommittees responsible for completing the specific tasks which have been identified. Attached (see Attachment 1) is a draft description of the OCS Coordination Committee and the various subcommittees as well as proposed membership assignments. Several of these subcommittees are existing work groups. Please review the descriptions and proposed assignments carefully and recommend changes by June 13, 1980.

The subcommittees will be responsible for completing a number of ongoing OCS tasks within the Agency which are preliminary to further permit issuance. As an example of a schedule and milestones for one of these tasks, we have attached (see Attachment 2) a summary and workplan for one of the tasks of the

Permits Oversight Subcommittee. Such a plan for each task is necessary to organize these tasks, to identify issues, to provide increased coordination between offices, and to ensure timely completion of each task. I am, therefore, requesting that each subcommittee identify the tasks under its jurisdiction and prepare a summary and work-plan for each (also by June 13, 1980).

We must move quickly to resolve the problems associated with regulating the offshore oil and gas industry because of the increasing attention energy development will receive over the next few years. Please give this area a high priority. Any questions or comments should be directed to me (755-0440) or Bill Jordan (755-2545).

cc: Don Mausshardt (A-101)
Bill Dickerson (A-104)
Bill Beller (WH-548)
Al Wastler (WH-548)
David Tunderman (PM-221)
Ken Farber (WH-586)
Jeff Gaba (A-131)
Alan Eckert (A-131)
Al Galli (RD-682)
Tom Charlton (WH-548)
Alex Karlin (EN-338)
Joel Schwartz (PM-221)
Suzanne Bolton (WH-548)
Richard Wallentowicz (WH-548)
Tom Laverty (EN-336)
Virginia Fox-Norse (A-104)
John Hill (WH-548)
Sheri Hawkins (WH-548)
Beth Osheim (EN-336)
Michelle Hiller (EN-336)
Bruce Newton (EN-336)
Jean Mullen (A-102)
Leslie Carothers Region I
Julio Morales Region II
Stan Laskowski Region III
Sanford Harvey Region IV
Diana Dutton Region VI
Clyde Eller Region IX
Lloyd Reed Region X

Outer Continental Shelf Coordination Committee

Purpose: The committee will oversee all EPA activities involved in the regulation of offshore oil and gas exploration and production to ensure consistency and coordination between offices and the timely completion of specific tasks.

Members-DAA Level

R. Sarah Compton, OWE

Henry Longest, OWPO

Steven Schatzow, OWPS

Allan Hirsh, ORD

Roy Gamse, OPE

William Hedeman, OER

James Rogers, OGC

Staff Level

J. William Jordan

Alex Karlin

William Beller

T.A. Wastler

Kenneth Farber

Al Galli

Joel Schwartz

Bill Dickerson

Alan Eckert

Jeffrey Gaba

Staff Subcommittees

Drilling Mud Task Force - This group will be responsible for the review of literature and the conduct of additional studies as necessary to evaluate the effects of drilling muds. This group will also recommend regulatory approaches for drilling mud control.

Members - William Beller, OWPO, Chair
Al Galli, ORD
Bruce Newton, OWE
Dr. Suzanne Bolton, OWPO
Richard Wallentowicz, OWPO

Ocean Discharge Criteria Subcommittee - This group will ensure that regulations promulgated pursuant to section 403 of the Clean Water Act are consistent with Agency policy and other Agency programs.

Members - Kenneth Farber, OWPS, Chair
Al Galli, ORD
Jeffrey Gaba, OGC
Thomas Laverty, OWE
Virginia Fox-Norse, OER
John Hill, OWPO
Joel Schwartz, OPE

Ocean Dumping Subcommittee - This group will be responsible for the reevaluation and possible revision of the ocean dumping regulations and for coordinating the timely designation of dumping sites.

Members - T. A. Wastler, OWPO, Chair:
Al Galley, ORD
Kenneth Farber, OWPS
Joel Schwartz, OPE
Elizabeth Osheim, OWE
John Hill, OWPO

Memoranda of Understanding Subcommittee - This group will be responsible for developing MOU's between EPA, USGS, BLM, and Coast Guard to coordinate respective activities. This group will also develop future permitting strategies to guide the MOU negotiations including development of criteria for areas of biological concern.

Members - J. William Jordan, OWE, Co-chair
Bill Dickerson, OER, Co-chair
Michelle Hiller, OWE
Virginia Fox-Norse, OER
Thomas Charlton, OWPO
Sheri Hawkins, OWPO
Jeffrey Gaba, OGC
Joel Schwartz, OPE

Permits Oversight Subcommittee - This group will coordinate, expedite, and ensure consistency of individual and general permits issued for offshore oil and gas activities.

Members - J. William Jordan, OWE, Chair
Bruce Newton, OWE,
Elizabeth Osheim, OWE
Richard Wallentowicz, OWPO
Jeffrey Gaba, OGC
Kenneth Farber, OWPS
Joel Schwartz, OPE

Interagency Task Forces Subcommittee - This group shall follow the progress of the Flower Gardens Task Force, the Flower Gardens Interagency Monitoring Program, and the Georges Banks Biological Task Force and ensure coordination of their activities with program offices.

Members - William Beller, OWPO, Chair
Al Galli, ORD
Virginia Fox-Norse, OER
Dr. Suzanne Bolton, OWPO
Bruce Newton, OWE