



Representative Sampling Guidance (RSG)

What is a Representative Sample:

A representative sample is a sample collected from one facility (i.e., the representative facility) that is used as the basis to estimate emissions for another facility (i.e., the actual facility under review for the permitting action).

The representative facility is expected to have similar operations and process setup to the actual facility under review for the permitting action.

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Reasons for the RSG:

- AQD never had formal criteria
- Advancements in horizontal drilling changed liquids handled, lighter liquids
- Formations in Oklahoma are not homogenous
- Standard criteria for a consistent approach
- Wide variety of data and assumptions were being utilized
 - RSG helped to streamline the process for permit issuance

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Other State with similar RSG guidance:

- Colorado
- Louisiana
- North Dakota
- Texas
- Wyoming

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Basic RSG Overview:

- Any sample utilized (facility-specific or representative) must be obtained within 3 years
- Sample can be either obtained from the site or a sample from a regional facility can be used if meeting RSG criteria
- Certain construction permits can use any sample the facility feels represents emissions, subsequent operating permits must meet RSG

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RSG Updates:

- Adding definitions
- Adding section numbers and table of contents to promote easier navigation of the RSG
- Redesigning flow charts to clarify sample requirements, form submission requirements, and referencing the underlying section in the RSG for context
- Allowing all construction permits to utilize any sample

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RSG Updates:

- Only requiring RSG forms for representative samples
- Tank truck loading requirements added
- Extending acceptable sample range from 3 years to 60 months
- PBR applications are not required to submit RSG forms or sample unless requested
- Certain facilities will not be required to submit RSG forms and samples for fugitive VOC emissions

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RSG Updates:

- Added some conditions on when a case-by-case determination can be requested

Should be released this year, hopefully soon!