



Natural Gas STAR Program Guide to Participation

STEP 1 – Sign the Memorandum of Understanding

By signing the Memorandum of Understanding, the new Natural Gas STAR partner:

- ★ **Agrees to evaluate technologies and practices that reduce methane emissions.**
 - STAR Program Best Management Practices (BMPs) and Partner Reported Opportunities (PROs) are considered widely applicable and generally cost-effective by industry
 - Partner determines which activities are applicable and cost-effective for their operations
 - Implementation of specific practices is not mandatory
- ★ **Commits to participating at a level that best suits their company and operations.**
 - Extent of participation is flexible and the partner's decision
 - Many partners conduct pilot project(s) and expand participation based on the results outcome of pilot(s)
- ★ **Agrees to submit an Implementation Plan.**
 - Within 6 months for transmission and distribution companies and 1 year for production companies
- ★ **Agrees to report emission reductions annually.**
 - Past emission reductions may be included, back to 1990 for production companies and 1993 for transmission and distribution companies
- ★ **Can terminate the partnership at any time with no penalties, further obligation or publicity.**

Step 2 – Develop Implementation Strategy

Partners determine the objectives of their participation and which BMPs, PROs or other methane emission reduction activities will be considered. Typically, companies will:

- ★ **Evaluate STAR Program within corporate business objectives and organizational structure.**
 - Partners have integrated STAR into efficiency improvement and pollution prevention programs, environmental management systems, climate change strategies, and public relations/awareness campaigns
 - Partners can organize STAR activities into environmental, operations, or other areas; at the group, division, business unit, or corporate level
 - Some partners provide incentives such as performance awards, certificates, shirts, etc.
- ★ **Define expected level of effort and approach.**
 - Diverse implementation strategies adopted by partners include:
 - Coordinating with existing maintenance or replacement activities
 - Conducting pilot project(s) at specific facilities, divisions, or regions
 - Conducting baseline study to set performance standards and goals
 - Conducting and applying R&D projects

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- ★ **Identify and assess potential methane emission reduction activities.**
 - Evaluate applicability of BMPs and PROs to company operations
 - Conduct cost-benefit analyses to determine profitability of possible activities
 - Consider documenting and reporting past emission reduction activities

STEP 3 – Submit Implementation Plan

The Implementation Plan summarizes how the Partner intends to incorporate the STAR Program into their operations. Partners may choose to submit their plans on the standard form provided by the STAR Program or to devise their own formats. The submitted plan:

- ★ **Identifies BMPs, PROs and other emission reduction activities that are planned.**
- ★ **Outlines the planned scope of implementation.**
 - Identifies installations or facilities to be included
 - Does not require providing specific names, locations or percentage of included operations
- ★ **Represents the intent of the partner at the time of submission and is not binding.**
 - May be revised to adjust for changing business conditions or corporate organization
- ★ **Is kept confidential by EPA.**

STEP 4 – Plan Annual Reporting

Partners submit annual reports in the spring, documenting emissions reduction activities undertaken in the previous calendar year.

- ★ **A standard annual reporting form is available but partners are free to devise their own format.**
 - Reporting is project based, and reductions may be measured or estimated.
 - EPA provides industry-reviewed default values for BMPs.
- ★ **No penalty for delayed reporting, and partners may arrange to report on a different cycle.**
- ★ **Annual reports are kept confidential by EPA.**