

Compliance Assistance Session

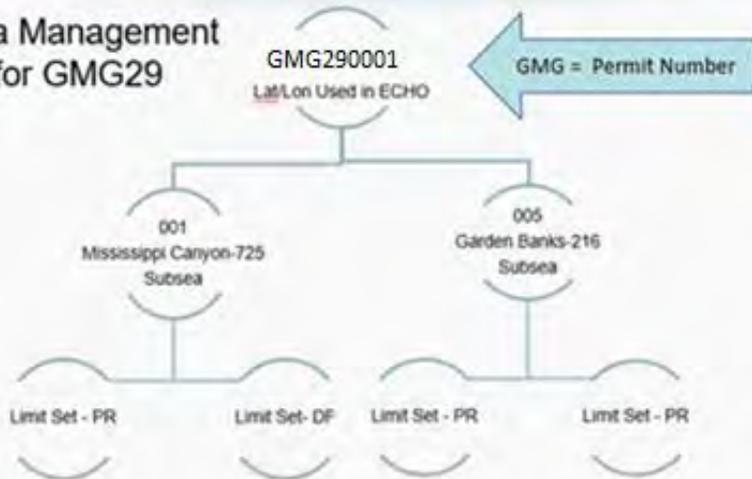
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General Permit Information

NPDES ID Data Model for GMG29

Data Management
for GMG29



Every facility should have a Permitted Feature (PF) ID Number

NPDES Offshore Oil & Gas GMG290000 General Permit

- Effective May 11, 2023
- The 2023 GMG290000 General Permit Expires May 10, 2028
- A Notice of Intent (NOI) must be submitted and active to have an authorized discharge.
- Structure Types:
 - Platform
 - MODU
 - Subsea

Discharge Monitoring Reports (DMR)

Quarterly Monitoring Periods

- Q1 = January, February, and March
- Q2 = April, May, and June
- Q3 = July, August, and September
- Q4 = October, November, December
- DRMS are due 60 days after the end of each monitoring period.
- If DMRs are corrected after the due date, the DMR will be flagged as late to EPA staff

DMR Instructions & Guide

- Will be available soon and will be posted on our offshore website.

2023 Discharge Monitoring Reports (DMRs)

- For the 2017 GMG290000 general permit, operators only had to submit one DMR for the entire quarter.
- For the 2023 GMG290000 general permit, the DMRs are now generated on a monthly basis. So, the operator will now have 3 DMRs to complete and submit for each quarter.

Example:

- 2017
 - 1 DMR per quarter (Jan, Feb, & Mar = 1 DMR)
- 2023 =
 - 3 DMRs per quarter (Jan = 1 DMR, Feb = 1 DMR, & Mar = 1 DMR , total of 3 DMRs)
- NetDMR does not generate future DMRs. Only when the monitoring period start date is actually started, then the DMRs will be available for the user.

Example:

- If today is August 1st, users will be able to see July and August DMRs but not September's DMR for the 3rd Quarter. User will be able to generate September's DMR starting on September 1st. So, if users search for DDD of September 1st, not DMRs will result.
- In NetDMR, users can search by DMR Due Date (DDD) for the month (ex: November 2023) they are seeking. Up to 6 DMRs can be displayed as "ready for data entry".
- [FAQ For Permittee on DMRs](#)

DMR Tips

NODI CODES LIST

Code	Parameter Name	NODI List	Quantity or Loading			Quality or Concentration				# of Ex.	Freq. of Analysis List	Smpl. Type List		
			Value 1	Value 2	Units	Value 1	Value 2	Value 3	Units					
79834	Produced water, free oil	Smpl.							=		d		01/01	VI
	1 - Effluent Gross										List			
	Season: 0	Req.							Req Mon	Quarterly Total	Days		Daily	VISUAL
	NODI: [dropdown]	NODI												
82599	Produced water, oil and grease	Smpl.				=		=			mg/L		01/30	GR
	1 - Effluent Gross										List			
	Season: 0	Req.				<= 29.0	Monthly Average	<= 42.0	Daily Maximum		Milligrams per Liter		Monthly	GRAB
	NODI: [dropdown]	NODI												
82600	Produced water, flow	Smpl.	=			bb/d							01/30	ES
	1 - Effluent Gross					List								
	Season: 0	Req.	Req Mon	Monthly Average		Barrels per Day							Monthly	ESTIMA
	NODI: [dropdown]	NODI												
TGP3E	Pass/Fail Static Renewal 7 Day Chronic <i>Americamysis bahia</i> (formerly <i>Mysidopsis bahia</i>)	Smpl.									pass=0;fail=1		09/99	GR
	1 - Effluent Gross										List			
	Season: 0	Req.							Req Mon	Value	Pass=0; Fail=1		See Permit	GRAB
	NODI: [dropdown]	NODI												
TGP6B	Pass/Fail Static Renewal 7Day Chronic <i>Menidia</i>	Smpl.									pass=0;fail=1		09/99	GR
	1 - Effluent Gross										List			
	Season: 0	Req.							Req Mon	Value	Pass=0; Fail=1		See Permit	GRAB
	NODI: [dropdown]	NODI												

If a representative sample is not possible due to a natural disaster, environmental conditions, or weather, the facility should use one of the following NODI Codes:

K - Natural disaster (declared by President)

T - Environmental conditions- monitoring not possible (hurricanes that are not declared by President, high tides)

V - Weather related (thunderstorms, hail, wind, etc.).

Facilities have 30 days after a weather event/national disaster occurs to submit DMRs or other required reporting documents. 4

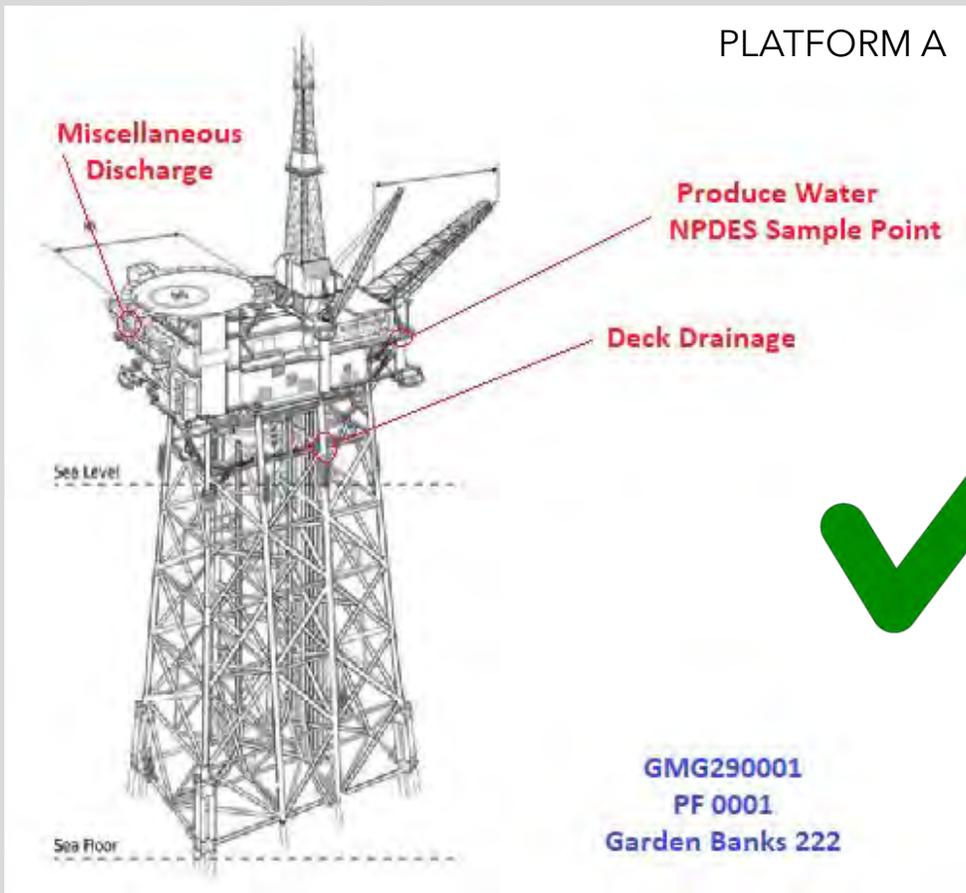
Limit Sets

* While none of the Limit Sets are mandatory, operators **must select at least one** or the eNOI will not go forward for signature.

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Limit Set Designator:	Limit Set Description:
BM	Maintenance Best Management Plan (BMP)
CT	Chemically Treated Waters
CW	Cooling Water Intake Structure Requirements For New Facilities For Which Construction Was Commenced After July 27, 2006
DC	Drill Cuttings
DD	Deck Drainage
DF	Drilling Fluids
DW	Domestic Waste
HF	Hydrate Control Fluids
MD	Miscellaneous Discharges (Includes Packer Fluids & Pipeline Brine)
MT	Miscellaneous Discharges Toxicity (Chemically Treated)
PM	Produced Water Monthly Toxicity
PR	Produced Water
SB	Synthetic Based Muds (SBM) Cuttings
SW	Sanitary Waste
TC	Well Treatment Fluids, Completion Fluids, Workover Fluids
WF	Well Fluids

Site Maps for NOI



NOTE: The site maps (green check marks) are only examples and are not an accurate representation of a facility. These were created for training purposes only to give the audience an idea of what the site maps should include.

Site map should be labeled and include the following:

- Facility Name
- All Applicable Limit Sets (e.g., CT, DD, PF, etc.)
- The location of the Limit Sets on the facility

EPA Request to also add:

- Permitted Feature ID #s
- Lease Block Name & Number



1. CW
2. DD
3. MD
4. DF

Sampling Tips



- Personal Protective Equipment (PPE)
- Chain Of Custody
- Holding Times
- Sample Kits
- Proper Sampling (static sheen method, preservatives, etc)
- Proper temperature storage

Representative Sampling & Monitoring

- ❖ Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.
- ❖ All Discharges are required to be upstream of the sample point, which includes any connections from 3rd-party equipment.
- ❖ If there is more than one discharge location of the same limit set then a representative sample must reflect both discharges.
- ❖ All monitoring needs to be following the frequency requirements, such as daily, weekly, monthly, quarterly, annually, etc.
- ❖ Be aware of any triggers that can increase your monitoring and/or sampling frequency, such as a 20% increase in flow volume or a failed WET test.

Cooling Water

New non-fixed facilities

- Visual or remote inspection every 6 months (weather dependent)
- Monitor and report CW intake flow velocity to ensure intake flow doesn't exceed 0.5 ft/sec:
 - <0.300 = Quarterly
 - $0.033-0.38$ = Monthly
 - >0.38 = Daily

A downtime, up to two weeks, for periodic maintenance or repair is allowed and must be reported in the DMRs.

New Fixed Facility without a Sea Chest

- Visual or remote inspection every 6 months (weather dependent)
- Monitor and report CW intake flow velocity to ensure intake flow doesn't exceed 0.5 ft/sec.
- Entrainment monitoring/sampling (exception: Study)

New Fixed Facility with a Sea Chest

- Visual or remote inspection every 6 months (weather dependent)
- Monitor and report CW intake flow velocity to ensure intake flow doesn't exceed 0.5 ft/sec:
- Entrainment monitoring/sampling not required

All Facilities

For all new facilities required to comply with intake structure monitoring requirements must submit the following information in a yearly status report by March 31.

(Send report via email if possible. If the document is too big to send via email, please contact EPA R6)

New facilities = defined as facilities for which construction was commenced after July 17, 2006

7. Twenty-Four Hour Reporting

- a. The permittee shall report any noncompliance which may endanger health or the environment. Any information shall be reported to the Offshore 24-Hour Reporting Application Portal at the following address <https://caedext.epa.gov/ords/caedext/f?p=OFFSHOREINCIDENT> within 24 hours of the time the permittee becomes aware of the circumstances. Please visit <https://www.epa.gov/npdes-permits/support-documents-mpdes-general-permit-offshore-oil-and-gas-operations-western-gulf> for instructions on creating an account and submitting a report. If the online system is not available, an email shall be submitted to the Offshore Specialist within 24 hours of the time the permittee becomes aware of the circumstance, and an electronic report shall be submitted to the Offshore 24-Hour Reporting Application Portal within 14 days of the system becoming available. A detailed report shall be submitted with the quarterly NetDMR. The report shall contain the following information:
 - (1) A description of the noncompliance and its cause;
 - (2) The period of noncompliance including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and,
 - (3) Steps being taken to reduce, eliminate, and prevent recurrence of the noncomplying discharge.
- b. The following shall be included as information which must be reported within 24 hours:
 - (1) Any unanticipated bypass which exceeds any effluent limitation in the permit;
 - (2) Any upset which exceeds any effluent limitation in the permit; and,
 - (3) Violation of a maximum daily discharge limitation for any of the pollutants listed by the Director in Part I of the permit to be reported within 24 hours.
- c. All sheen events associated with Miscellaneous Discharges, Miscellaneous Discharges of seawater and freshwater to which treatment chemicals have been added, Well Treatment Fluids, Completion Workover Fluids, Pipeline Brine, Produced Water, Deck Drainage, Drill Cuttings, and Drilling Fluids must be reported under the twenty-four hour reporting requirements.

24-HOUR Reporting Portal

Important Note:

All sheen events must be reported within 24-Hours to the EPA 24-Hour Reporting Portal as well as on the DMRs. This includes Produce Water (PR) sheens.

Free Oil / Visual Sheen Observations

DF/DC	DD	PR	TCW	MD
<p>Prohibited/Not Allowed</p> <p>Monitoring = Static Sheen Method once per week</p> <p>Reporting = Total number of days sheen observed</p>	<p>Prohibited/Not Allowed</p> <p>Monitoring = Daily Visual Observation</p> <p>Reporting = Total number of days sheen observed</p>	<p>PR Sheen Limit Daily Max = 42 mg/L</p> <p>Monitoring = Daily Visual Observation</p> <p>A Produced water sheen sample must be included in the monthly average calculations.</p> <p>Mon Avg = 29 mg/L</p> <p>Sheen Sample = within 2 hrs. of observation</p>	<p>Prohibited/Not Allowed</p> <p>Monitoring = Static Sheen Method Daily when discharging</p> <p>Reporting = Total number of days sheen observed</p>	<p>Prohibited/Not Allowed</p> <p>Monitoring = Daily or once prior to discharge per discharge</p> <p>Method = Visual Sheen or Static Sheen</p> <p>Reporting = Total number of days</p>

EPA Inspections & Enforcement

Offshore Facility Inspections & Corporate Audits

- Offshore Inspections
 - EPA conducts inspections on offshore facilities located in the central to western portion of the Gulf of Mexico.
 - Most of the inspections conducted offshore are in partnership with BSEE.
- Corporate Audits
 - Audits are conducted at the corporate office to review all facilities that are owned and/or operated by the permittee.

EPA Informal & Formal Enforcement Action

- Informal Actions
 - Notice of Potential Violation (NOPV) email
- EPA Formal Enforcement Actions
 - Administrative Order
 - Administrative Penalty Order
 - Criminal Cases
- Other EPA Enforcement Actions
 - 308 Information Request
- Joint External Formal Enforcement Actions
 - Department of Justice (DOJ) referrals



Contact Sharon Angove and Mitty Garcia if you have and questions or concerns:

- Angove.Sharon@epa.gov
- Garcia.mitty@epa.gov

Note: When emailing us regarding an issue, please send a detailed summary and screenshots of the issue when possible.

QUESTIONS?

