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# Region 6 – 2023 GMG290000 Permit Changes



# Notice of Intent

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- All vessels, are be able to file one valid NOI when performing jobs in the same lease block, if jobs are performed for the same designated operator
- Operators who filed under the previous permit have an additional 30 days to submit eNOI, if the system is unavailable during the 60 day renewal period
  - Covered for up to 90 days
  - Only new operators, not covered under the previous permit, can submit temporary NOIs when system is unavailable.
- Coverage for temporary NOI extended 14 days, after the system becomes available, if the system remains unavailable after 14 days.
- Facility map that delineates authorized discharge locations and type



# Whole Effluent Toxicity

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- **Well Treatment, Completion and Workover Fluids**
  - Acute toxicity limitations
    - Results can be derived from chronic test
    - Two year compliance period
  - Chronic monitoring
  
- **Produced Water**
  - Calculation for WET critical dilutions and testing frequencies is based on calendar year
  - Waiver minimum number of samples - effluent ceases



# Marine Sanitation Devices

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- All limits must be complied with in the event the Marine Sanitation Device is not properly operating or not operating
  - Solids Prohibition
  - TRC minimum of 1 mg/l (10 plus persons)
- Other disinfection technologies that result in equivalent or improved disinfection (of the Sanitary Waste stream to that considered in the ELG) are allowed as substitutes for systems that use chlorine, if approved by the U.S. Coast Guard
  - TRC monitoring is not required for alternatives that do not use chlorine, unless a chlorine-based product is used as a backup
- Failure to comply with USCG MSD requirements must be submitted in non-compliance report to EPA



# Cooling Water Intake

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- **All Facilities subject to 316(b)**
  - Structure(s) must be designed, constructed, operated, and maintained so that the maximum through-screen design intake velocity shall not exceed 0.5 ft/s
  - Develop and implement an Operation and Maintenance plan
  - Cooling water intake velocity exceedances must be reported on DMRs



# Monitoring & Reporting

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- Produced Water
  - Once a month Temperature monitoring
- All facilities are subject to monitoring requirements if they discharged during said monitoring period, regardless of whether the discharge lasted the full period
- Flow
  - Method/calculations must be documented
- Sample type for oil and grease is grab or composite.
- Facilities have 30 days after a weather event/national disaster occurs to submit DMRs or other required reporting documents
- 24 hour reporting - Offshore 24 hour reporting application portal
- Corrected data for Discharge Monitoring Reports (DMRs) and Other Reports must be submitted no later than the following quarter.
- Updates to addresses, contact, locations etc. must be made within 30 days of change



# Authorized Discharges

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- Decommissioning/abandonment discharges are only authorized when equipment has been flushed and captured prior to disconnection
- Permit does not authorize radioactive materials that are under the jurisdiction of the NRC
- Misc Discharges – subsea cleaning fluids



## Other

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- After the expiration date, should the permit not be reissued prior to expiration and be administratively continued, new operators are not eligible for coverage and existing operators may not submit new NOI's during the administratively continued period
- State general permit or state individual permit may be required
- Civil and administrative penalty amounts have been updated to reflect updated statutory amounts

