



REGION 6
DALLAS, TX 75270

March 12, 2024

TRANSMITTED VIA EMAIL

Mr. Joel Koch, General Manager of Operations
Union Oil Company of California (UNOCAL)
100 Northpark Boulevard
Covington, LA 70433
ckoc@chevron.com

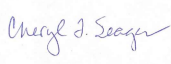
Re: Administrative Order, Docket Number: CWA-06-2024-1744
NPDES Permit: GMG290128

Dear Mr. Joel Koch:

Enclosed is an Administrative Order (AO) issued by the United States Environmental Protection Agency (EPA) Region 6 to Union Oil Company of California (UNOCAL) for violations of the Clean Water Act, 33 U.S.C. § 1251 *et seq.*, and its National Pollutant Discharge Elimination System (NPDES) permit at Permitted Features PF 0745 and PF 0756 under permit number GMG290128. This AO requires UNOCAL to comply with the provisions set forth in the attached AO for violations identified during a review of Discharge Monitoring Reports from January 1, 2023, to December 31, 2023. This AO does not assess a monetary penalty; however, it does require compliance with applicable federal regulations. The first compliance deadline is within thirty (30) days of receipt of this AO.

EPA is committed to ensuring compliance with the requirements of the NPDES program, and my staff will assist you in any way possible. EPA requests that you immediately confirm receipt of this e-mail and the attached AO by a response e-mail to Ms. Sharon Angove. Please reference AO Docket Number CWA-06-2024-1744 and NPDES Permit Number GMG290128 in your response.

Sincerely,


Digitally signed by Cheryl T. Seager
Date: 2024.03.12 11:50:36 -05'00'

Cheryl T. Seager, Director
Enforcement and
Compliance Assurance Division

Enclosures: Attachment A

cc: Judy Triche, Chief, Environmental Monitoring Unit
Bureau of Safety and Environmental Enforcement
judy.triche@bsee.gov



U.S. ENVIRONMENTAL PROTECTION AGENCY - REGION 6

FINDINGS OF VIOLATION AND COMPLIANCE ORDER

In the Matter of: Union Oil Company of California (UNOCAL)

Docket No.: CWA-06-2024-1744 NPDES No.: GMG290128

STATUTORY AUTHORITY

The following findings are made, and Order issued, under the authority vested in the Administrator of the United States Environmental Protection Agency (EPA) by Section 309(a) of the Clean Water Act (the Act), 33 U.S.C. § 1319(a). The Administrator of EPA delegated the authority to issue this Order to the Regional Administrator of EPA Region 6, who further delegated this authority to the Director of the Enforcement and Compliance Assurance Division.

FINDINGS

1. Union Oil Company of California (UNOCAL) (Respondent) is a "person," as that term is defined at Section 502(5) of the Act, 33 U.S.C. § 1362(5), and 40 C.F.R. § 122.2.
2. At all times relevant to this Order (all relevant times), Respondent owned or operated offshore oil and gas production and/or exploration facilities located in the Central and Western Portions of the Gulf of Mexico in the Outer Continental Shelf (facilities), and is, therefore, an "owner or operator" within the meaning of 40 C.F.R. § 122.2. The mailing address for Respondent is 100 Northpark Boulevard, Covington, LA 70433.
3. At all relevant times, the facilities acted as "point sources" of "discharges" of "pollutants" to the receiving waters of the Gulf of Mexico, which is considered a "water of the United States" within the meaning of Section 502 of the Act, 33 U.S.C. § 1362, and 40 C.F.R. § 122.2.
4. Because Respondent owns or operates facilities that act as point sources of discharges of pollutants to a water of the United States, Respondent and the facilities are subject to the Act and the National Pollutant Discharge Elimination System (NPDES) program.
5. Under Section 301 of the Act, 33 U.S.C. § 1311, it is unlawful for any person to discharge any pollutant from a point source to waters of the United States, except with the authorization of, and in compliance with, an NPDES permit issued pursuant to Section 402 of the Act, 33 U.S.C. § 1342.
6. Section 402(a) of the Act, 33 U.S.C. § 1342(a), provides that the Administrator of EPA may issue permits under the NPDES program for the discharge of pollutants from point sources to waters of the United States. Any such discharge is subject to the specific terms and conditions prescribed in the applicable permit.
7. Pursuant to Section 402(a) of the Act, 33 U.S.C. § 1342(a), EPA issued the "NPDES General Permit for New and Existing Sources and New Dischargers in the Offshore Subcategory of the Oil and Gas Extraction Point Source Category for the Western Portion of the Outer Continental Shelf of the Gulf of Mexico" (GMG290000) (permit), which was reissued and took effect in its current form on October 1, 2017. The permit authorizes discharges from new sources, existing sources, and new dischargers in the Offshore Subcategory of the Oil and Gas Extraction Point Source Category (40 C.F.R. Part 435, Subpart A) by operators of lease blocks located in Federal Waters of the Central and Western Portions of the Gulf of Mexico. The permit does not authorize discharges from facilities located in, or discharging to, the territorial seas of Louisiana or Texas or from facilities defined as "coastal," "onshore," or "stripper" (40 C.F.R. Part 435, Subparts C, D, and F). The permit is available at https://www.epa.gov/sites/default/files/2017-09/documents/2017_final_gp_for_fr_091817.pdf
8. Part I.B of the permit places certain limitations on the quality and quantity of effluent discharges by Respondent. Effluent limitations, prohibitions, and monitoring requirements are listed in Table 1 of Appendix F of the permit.
9. Part I of the permit requires Respondent to sample and test its effluent and monitor compliance with permit conditions according to specific procedures in order to determine the facilities' compliance or noncompliance with the permit and applicable regulations. Part II.D of the permit requires Respondent to file with EPA certified Discharge Monitoring Reports (DMRs) of the results of monitoring, and Noncompliance Reports when appropriate.
10. A DMR file review was conducted by EPA for the monitoring period of January 1, 2023, to December 31, 2023.

11. Certified DMRs filed by Respondent with EPA in compliance with the permit show discharges of pollutants from the facilities that exceed the permitted effluent limitations for Whole Effluent Toxicity (WET) in Part I.B of the permit for permitted features 0745 and 0756, as specified in Attachment A which is incorporated herein by reference.

12. Each instance in which Respondent discharged pollutants to waters of the United States in amounts exceeding the effluent limitations contained in the permit is a violation of the permit and Section 301 of the Act, 33 U.S.C. § 1311.

13. Each violation of the permit conditions or regulations described above is a violation of Section 301 of the Act, 33 U.S.C. § 1311.

SECTION 309(a)(3) COMPLIANCE ORDER

14. Based on the foregoing Findings and pursuant to the authority of Section 309(a)(3) of the Act, 33 U.S.C. § 1319(a)(3), EPA hereby orders Respondent to take the following action:

A. Within thirty (30) days of the effective date of this Order, Respondent shall take such steps as necessary to comply with the effluent limitation provisions of the permit.

B. Within thirty (30) days of the effective date of this Order, Respondent must certify compliance with the terms and conditions of the permit for the violations in Attachment A.

C. Within thirty (30) days of the effective date of this Order, Respondent shall provide EPA with a list of all mechanical, management and operational deficiencies and a narrative describing the specific actions taken to correct all violations cited in this Order. This list shall address the root cause of the deficiencies and steps to prevent future recurrences.

D. Within thirty (30) days of the effective date of this Order, Respondent shall submit a report to EPA that includes any costs incurred for corrective actions taken to come into compliance and any associated costs of labor.

E. In the event Respondent believes complete correction of the violations cited herein is not possible within

thirty (30) days of the effective date of this Order, Respondent shall submit a comprehensive written plan for the elimination of the cited violations within the shortest possible time. Such plan shall describe in detail the specific corrective actions to be taken and why such actions are sufficient to correct the violations. The plan shall include a detailed schedule for the elimination of the violations within the shortest possible time, as well as measures to prevent similar violations from reoccurring. Any approved compliance schedule will be incorporated and reissued in a future administrative order.

F. If you have questions or comments on this matter, please contact Ms. Sharon Angove of my staff, at (214) 665-6472.

G. Any information or correspondence submitted by Respondent to EPA under this Order shall be addressed or emailed to the following:

Ms. Sharon Angove
Water Enforcement Branch (ECDWE)
EPA, Region 6
1201 Elm Street, Suite 500
Dallas, TX 75270
angove.sharon@epa.gov

GENERAL PROVISIONS

Respondent may seek federal judicial review of the Order pursuant to Chapter 7 of the Administrative Procedure Act, 5 U.S.C. §§ 701–706

Issuance of this Section 309(a)(3) Compliance Order shall not be deemed an election by EPA to forego any administrative or judicial, civil or criminal action to seek penalties, fines, or any other relief appropriate under the Act for the violations cited herein, or other violations that become known. EPA reserves the right to seek any remedy available under the law that it deems appropriate. Failure to comply with this Section 309(a)(3) Compliance Order or the Act can result in further administrative action, or a civil judicial action initiated by the United States Department of Justice.

For purposes of the identification requirement in Section 162(f)(2)(A)(ii) of the Internal Revenue Code, 26 U.S.C. § 162(f)(2)(A)(ii), and 26 C.F.R. § 1.162-21(b)(2), performance of Paragraph 15 is restitution, remediation, or required to come into compliance with the law.

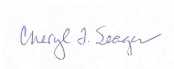
This Order does not constitute a waiver or modification of the terms or conditions of Respondent's NPDES permit which remain in full force and effect.

Compliance with the terms and conditions of this Order does not relieve Respondent of its obligations to comply with any applicable federal, state, or local law or regulation.

The effective date of this Order is the date it is received by Respondent.

March 12, 2024

Date



Digitally signed by Cheryl T.
Seager
Date: 2024.03.12 11:50:15 -05'00'

Cheryl T. Seager, Director
Enforcement and
Compliance Assurance Division

ATTACHMENT A

NPDES ID(s): GMG290128

Limit Set: - TC

State: GM

Major/Minor Indicator: Minor

Violation Date: 01/01/2023 - 12/31/2023

Violation Type(s): Effluent Violation

Environmental Protection Agency Integrated Compliance Information System (ICIS) Effluent Violations Report GMG290128

Created Date: 09/15/2010

Refresh Date: 02/14/2024

Report Version 1.5, Modified: 1/4/2017

Permittee Name:	UNION OIL CO. OF CALIFORNIA	Primary SIC Code:	1311	Permit Issued:	07/07/2023
Permittee Address:	100 NORTHPARK BLVD. COVINGTON, LA 70433	Primary SIC Desc:	Crude Petroleum And Natural Gas	Permit Effective:	07/07/2023
Major/Minor Indicator:	Minor	Primary NAICS Code:		Permit Expired:	05/10/2028
Compliance Track. Status:	On	Primary NAICS Desc:		Permit Status:	Effective
DMR Non Receipt Flag:	On	Cognizant Official:	JOEL KOCH, GENERAL MGR OF OPERATIONS		
		Cognizant Offcl. Ph.:	346-201-2943		
		Cog. Offcl. Email	ckoc@chevron.com		
RNC Tracking Flag:	On	Receiving Body:	GULF OF MEXICO		

Facility Information

Facility Name:	UNION OIL CO. OF CALIFORNIA	County:		FRS ID:	110011275789
Facility Location:	100 NORTHPARK BLVD. COVINGTON, LA 70433	Region:	06	Federal Facility Ownership:	
		State-Region:		Type of Ownership:	

ICIS Effluent Violations

Violation Code	Monitoring Period End Date	Monitoring Period	Limit Set	Lease Area/Block	Parameter	Mon. Loc.	Value Type/ Stat. Base	Reported Value/Units	Limit Value/Units
E90	12/31/2023	From 10/01/2023 to 12/31/2023	0756-TC	Walker Ridge-677	51713 - Whole Effluent Toxicity [WET] - Americamysis bahia (formerly Mysidopsis	1	Q2 VALUE	1 pass=0;fail=1	<= pass=0;fail=1
E90	12/31/2023	From 10/01/2023 to 12/31/2023	0756-TC	Walker Ridge-677	TLP3E - Low Flow Pass/Fail Survival Test Static Renewal 7 Day Chronic	1	C3 VALUE	1 pass=0;fail=1	<= pass=0;fail=1
E90	12/31/2023	From 10/01/2023 to 12/31/2023	0756-TC	Walker Ridge-677	TLP6J - Low Flow Pass/Fail Survival Test Static Renewal 7 Day Chronic Menidia	1	C3 VALUE	1 pass=0;fail=1	<= pass=0;fail=1
E90	12/31/2023	From 10/01/2023 to 12/31/2023	0756-TC	Walker Ridge-677	TWP3E - Pass/Fail Sub-Lethal Static Renewal 7 Day Chronic Americamysis	1	C3 VALUE	1 pass=0;fail=1	<= pass=0;fail=1
E90	12/31/2023	From 10/01/2023 to 12/31/2023	0756-TC	Walker Ridge-677	TWP6J - Pass/Fail Sub-Lethal Static Renewal 7 Day Chronic Menidia beryllina	1	C3 VALUE	1 pass=0;fail=1	<= pass=0;fail=1
E90	11/30/2023	From 10/01/2023 to 12/31/2023	0745-TC	Walker Ridge-678	TWP3E - Pass/Fail Sub-Lethal Static Renewal 7 Day Chronic Americamysis	1	C3 VALUE	1 pass=0;fail=1	<= pass=0;fail=1
E90	10/31/2023	From 10/01/2023 to 12/31/2023	0745-TC	Walker Ridge-678	TWP3E - Pass/Fail Sub-Lethal Static Renewal 7 Day Chronic Americamysis	1	C3 VALUE	1 pass=0;fail=1	<= pass=0;fail=1