



**REGION 6**  
DALLAS, TX 75270

July 30, 2025

TRANSMITTED VIA EMAIL

Jeremy Dugas  
Environmental Supervisor  
GOM Shelf, LLC  
2107 Research Forrest Drive, Suite 250  
The Woodlands, Texas 77380  
jeremy.dugas@commodoreoffshore.com

Re: Notice of Potential Violation and Opportunity to Confer  
NPDES Permit: GMG290235

Dear Mr. Dugas:

Information currently available to the United States Environmental Protection Agency, Region 6 (EPA) suggests that GOM Shelf, LLC may have committed violations of Section 301 of the Clean Water Act (CWA), 33 U.S.C. § 1311 and the National Pollution Discharge Elimination System (NPDES) General Permit for Offshore Activities (GMG290000) at the Permitted Features listed in the Enclosures. By this letter, EPA is extending to you an opportunity to advise EPA, via a conference call or in writing, of any information which EPA should consider with respect to the potential violations.

GOM Shelf, LLC owns or operates facilities that discharge pollutants to the waters of the contiguous zone or the ocean under the permit, GMG290235. EPA identified the potential violations in a file review for the monitoring period of May 11, 2023 to May 31, 2025 and in a compliance evaluation inspection conducted by the United States Bureau of Safety and Environmental Enforcement (BSEE) on May 28, 2024. The potential violations are listed in Attachments contained herein. **Within 15 calendar days of receipt of this letter**, please indicate if you would like to discuss this matter by contacting Uma Lad of my staff at (214) 665-8574 or lad.uma@epa.gov.

Sincerely,

  
Bryant Smalley  
Chief  
Water Enforcement Branch

Enclosures

Attachment A – Effluent Violations

Attachment B – DMR Non-Receipt Violations

Attachment C – BSEE Inspection Violations

ec: Judy Triche, Chief, Environmental Monitoring Unit, BSEE  
judy.triche@bsee.gov

**Attachment A**  
**Environmental Protection Agency**  
**Integrated Compliance Information System (ICIS)**  
**Effluent Violations**  
**GMG290235**

Review Period: 05/11/2023 - 05/31/2025

| Monitoring Period End Date | Monitoring Period             | Limit Set | Lease Area/Block <sup>1</sup> | Parameter                              | Value Type/ Stat. Base | Reported Value/Units | Limit Value/Units |
|----------------------------|-------------------------------|-----------|-------------------------------|----------------------------------------|------------------------|----------------------|-------------------|
| 09/30/2024                 | From 07/01/2024 to 09/30/2024 | 0247-DD   | HI, SA-A582                   | 82597 - Deck drainage, free oil        | C3<br>MO TOTAL         | 5 days               | 0 days            |
| 06/30/2024                 | From 04/01/2024 to 06/30/2024 | 0132-DD   | MP-153                        | 82597 - Deck drainage, free oil        | C3<br>MO TOTAL         | 1 day                | 0 days            |
| 05/31/2024                 | From 04/01/2024 to 06/30/2024 | 0243-DD   | WD-70                         | 82597 - Deck drainage, free oil        | C3<br>MO TOTAL         | 1 day                | 0 days            |
| 02/29/2024                 | From 01/01/2024 to 03/31/2024 | 0125-PR   | SMI, SA-149                   | 82599 - Produced water, oil and grease | C2<br>MO AVG           | 60.8 mg/l            | ≤ 29 mg/l         |
| 02/29/2024                 | From 01/01/2024 to 03/31/2024 | 0125-PR   | SMI, SA-149                   | 82599 - Produced water, oil and grease | C3<br>DAILY MX         | 117 mg/l             | ≤ 42 mg/l         |

<sup>1</sup> HI, SA = High Island, South Addition; MP = Main Pass; WD = West Delta; SMI, SA = South Marsh Island, South Addition

**Attachment B**  
**Environmental Protection Agency**  
**Integrated Compliance Information System (ICIS)**  
**DMR Non-Receipt Violations**  
**GMG290235**

Review Period: 05/11/2023 - 05/31/2025

| Monitoring Period End Date | Monitoring Period             | Limit Set | Lease Area/ Block <sup>2</sup> | Parameter                                                                                            | NODI Code <sup>3</sup> | DMR Due Date | DMR Submission Date |
|----------------------------|-------------------------------|-----------|--------------------------------|------------------------------------------------------------------------------------------------------|------------------------|--------------|---------------------|
| 06/30/2024                 | From 04/01/2024 to 06/30/2024 | 0176-SW   | ST, SA-295                     | 82605 - Sanitary waste, residual chlorine                                                            | **E**                  | 08/31/2024   | 08/21/2024          |
| 03/31/2024                 | From 01/01/2024 to 03/31/2024 | 0128-MD   | MP, S&E -308                   | 04239 - Misc. free oil in Western GOA, OCS                                                           |                        | 05/31/2024   | Missing             |
|                            |                               |           |                                | 51726 - Critical Dilution                                                                            |                        |              |                     |
|                            |                               |           |                                | 51726 - Critical Dilution                                                                            |                        |              |                     |
|                            |                               |           |                                | 51938 - Miscellaneous Discharge Toxicity [Subsea Discharges] [Americamysis bahia (Mysidopsis bahia)] |                        |              |                     |
|                            |                               |           |                                | 51939 - Miscellaneous Discharge Toxicity [Subsea Discharges] [Menidia beryllina]                     |                        |              |                     |
|                            |                               |           |                                | 51940 - Miscellaneous Discharges [Pipeline Brine] [Free Oil]                                         |                        |              |                     |
|                            |                               |           |                                | 51941 - Miscellaneous Discharges [Pipeline Brine] [Oil & Grease]                                     |                        |              |                     |
|                            |                               |           |                                | 74076 – Flow                                                                                         |                        |              |                     |
|                            |                               |           |                                | TOP3E - NOEC Lethal Static Renewal 7 Day Chronic Americamysis bahia (formerly Mysidopsis bahia)      |                        |              |                     |
|                            |                               |           |                                | TOP6J - NOEC Lethal Static Renewal 7 Day Chronic Menidia beryllina                                   |                        |              |                     |
|                            |                               |           |                                | TPP3E - NOEC Sub-Lethal Static Renewal 7 Day Chronic Americamysis bahia (formerly Mysidopsis bahia)  |                        |              |                     |
|                            |                               |           |                                | TPP6J - NOEC Sub-Lethal Static Renewal 7 Day Chronic Menidia beryllina                               |                        |              |                     |

<sup>2</sup> ST, SA = South Timbalier, South Addition; MP, S&E = Main Pass, South & East Addition; ST = South Timbalier; GI = Grand Isle; SMI, NA = South Marsh Island, North Addition; SS, SA = Ship Shoal, South Addition

<sup>3</sup> Information on DMR Non-Receipt status can be found on here: [NPDES DMR Non-Receipt Status Search Help](#).

|            |                               |         |              |                                                                                                      |       |            |            |
|------------|-------------------------------|---------|--------------|------------------------------------------------------------------------------------------------------|-------|------------|------------|
| 03/31/2024 | From 01/01/2024 to 03/31/2024 | 0174-PR | ST-49        | 00010 - Temperature, water deg. centigrade                                                           |       | 05/30/2024 | Missing    |
|            |                               |         |              | 51954 - Oil & grease, free oil                                                                       |       |            |            |
|            |                               |         |              | 79834 - Produced water, free oil                                                                     |       |            |            |
|            |                               |         |              | 82599 - Produced water, oil and grease (Daily Maximum)                                               |       |            |            |
|            |                               |         |              | 82599 - Produced water, oil and grease (Monthly Average)                                             |       |            |            |
|            |                               |         |              | 82600 - Produced water, flow                                                                         |       |            |            |
| 03/31/2024 | From 01/01/2024 to 03/31/2024 | 0223-PR | GI-47        | 00010 - Temperature, water deg. centigrade                                                           | **E** | 05/30/2024 | 05/21/2024 |
| 02/29/2024 | From 01/01/2024 to 03/31/2024 | 0128-MD | MP, S&E -308 | 04239 - Misc. free oil in Western GOA, OCS                                                           |       | 05/31/2024 | Missing    |
|            |                               |         |              | 51726 - Critical Dilution                                                                            |       |            |            |
|            |                               |         |              | 51726 - Critical Dilution                                                                            |       |            |            |
|            |                               |         |              | 51938 - Miscellaneous Discharge Toxicity [Subsea Discharges] [Americamysis bahia (Mysidopsis bahia)] |       |            |            |
|            |                               |         |              | 51939 - Miscellaneous Discharge Toxicity [Subsea Discharges] [Menidia beryllina]                     |       |            |            |
|            |                               |         |              | 51940 - Miscellaneous Discharges [Pipeline Brine] [Free Oil]                                         |       |            |            |
|            |                               |         |              | 51941 - Miscellaneous Discharges [Pipeline Brine] [Oil & Grease]                                     |       |            |            |
|            |                               |         |              | 74076 – Flow                                                                                         |       |            |            |
|            |                               |         |              | TOP3E - NOEC Lethal Static Renewal 7 Day Chronic Americamysis bahia (formerly Mysidopsis bahia)      |       |            |            |
|            |                               |         |              | TOP6J - NOEC Lethal Static Renewal 7 Day Chronic Menidia beryllina                                   |       |            |            |
|            |                               |         |              | TPP3E - NOEC Sub-Lethal Static Renewal 7 Day Chronic Americamysis bahia (formerly Mysidopsis bahia)  |       |            |            |
|            |                               |         |              | TPP6J - NOEC Sub-Lethal Static Renewal 7 Day Chronic Menidia beryllina                               |       |            |            |
| 02/29/2024 | From 01/01/2024 to 03/31/2024 | 0151-PR | SMI, NA-268  | 00010 - Temperature, water deg. centigrade                                                           | **E** | 05/31/2024 | 05/21/2024 |

|            |                               |         |              |                                                                                                      |       |            |            |
|------------|-------------------------------|---------|--------------|------------------------------------------------------------------------------------------------------|-------|------------|------------|
| 02/29/2024 | From 01/01/2024 to 03/31/2024 | 0151-PR | SMI, NA-268  | 82599 - Produced water, oil and grease (Daily Maximum)                                               | **E** | 05/31/2024 | 05/21/2024 |
| 02/29/2024 | From 01/01/2024 to 03/31/2024 | 0151-PR | SMI, NA-268  | 82599 - Produced water, oil and grease (Monthly Average)                                             | **E** | 05/31/2024 | 05/21/2024 |
| 02/29/2024 | From 01/01/2024 to 03/31/2024 | 0170-SW | SS, SA-274   | 82605 - Sanitary waste, residual chlorine                                                            | **E** | 05/31/2024 | 05/17/2024 |
| 02/29/2024 | From 01/01/2024 to 03/31/2024 | 0174-PR | ST-49        | 00010 - Temperature, water deg. centigrade                                                           |       | 05/30/2024 | Missing    |
|            |                               |         |              | 51954 - Oil & grease, free oil                                                                       |       |            |            |
|            |                               |         |              | 79834 - Produced water, free oil                                                                     |       |            |            |
|            |                               |         |              | 82599 - Produced water, oil and grease (Daily Maximum)                                               |       |            |            |
|            |                               |         |              | 82599 - Produced water, oil and grease (Monthly Average)                                             |       |            |            |
|            |                               |         |              | 82600 - Produced water, flow                                                                         |       |            |            |
| 01/31/2024 | From 01/01/2024 to 03/31/2024 | 0128-MD | MP, S&E -308 | 04239 - Misc. free oil in Western GOA, OCS                                                           |       | 05/31/2024 | Missing    |
|            |                               |         |              | 51726 - Critical Dilution                                                                            |       |            |            |
|            |                               |         |              | 51726 - Critical Dilution                                                                            |       |            |            |
|            |                               |         |              | 51938 - Miscellaneous Discharge Toxicity [Subsea Discharges] [Americamysis bahia (Mysidopsis bahia)] |       |            |            |
|            |                               |         |              | 51939 - Miscellaneous Discharge Toxicity [Subsea Discharges] [Menidia beryllina]                     |       |            |            |
|            |                               |         |              | 51940 - Miscellaneous Discharges [Pipeline Brine] [Free Oil]                                         |       |            |            |
|            |                               |         |              | 51941 - Miscellaneous Discharges [Pipeline Brine] [Oil & Grease]                                     |       |            |            |
|            |                               |         |              | 74076 - Flow                                                                                         |       |            |            |
|            |                               |         |              | TOP3E - NOEC Lethal Static Renewal 7 Day Chronic Americamysis bahia (formerly Mysidopsis bahia)      |       |            |            |
|            |                               |         |              | TOP6J - NOEC Lethal Static Renewal 7 Day Chronic Menidia beryllina                                   |       |            |            |
|            |                               |         |              | TPP3E - NOEC Sub-Lethal Static Renewal 7 Day Chronic Americamysis bahia (formerly Mysidopsis bahia)  |       |            |            |
|            |                               |         |              | TPP6J - NOEC Sub-Lethal Static Renewal 7 Day Chronic Menidia beryllina                               |       |            |            |

|            |                               |         |              |                                                                                                      |       |            |            |
|------------|-------------------------------|---------|--------------|------------------------------------------------------------------------------------------------------|-------|------------|------------|
| 01/31/2024 | From 01/01/2024 to 03/31/2024 | 0170-SW | SS, SA-274   | 82605 - Sanitary waste, residual chlorine                                                            | **E** | 05/31/2024 | 05/17/2024 |
| 12/31/2023 | From 10/01/2023 to 12/31/2023 | 0128-MD | MP, S&E -308 | 04239 - Misc. free oil in Western GOA, OCS                                                           |       | 02/29/2024 | Missing    |
|            |                               |         |              | 51726 - Critical Dilution                                                                            |       |            |            |
|            |                               |         |              | 51726 - Critical Dilution                                                                            |       |            |            |
|            |                               |         |              | 51938 - Miscellaneous Discharge Toxicity [Subsea Discharges] [Americamysis bahia (Mysidopsis bahia)] |       |            |            |
|            |                               |         |              | 51939 - Miscellaneous Discharge Toxicity [Subsea Discharges] [Menidia beryllina]                     |       |            |            |
|            |                               |         |              | 51940 - Miscellaneous Discharges [Pipeline Brine] [Free Oil]                                         |       |            |            |
|            |                               |         |              | 51941 - Miscellaneous Discharges [Pipeline Brine] [Oil & Grease]                                     |       |            |            |
|            |                               |         |              | 74076 - Flow                                                                                         |       |            |            |
|            |                               |         |              | TOP3E - NOEC Lethal Static Renewal 7 Day Chronic Americamysis bahia (formerly Mysidopsis bahia)      |       |            |            |
|            |                               |         |              | TOP6J - NOEC Lethal Static Renewal 7 Day Chronic Menidia beryllina                                   |       |            |            |
|            |                               |         |              | TPP3E - NOEC Sub-Lethal Static Renewal 7 Day Chronic Americamysis bahia (formerly Mysidopsis bahia)  |       |            |            |
|            |                               |         |              | TPP6J - NOEC Sub-Lethal Static Renewal 7 Day Chronic Menidia beryllina                               |       |            |            |
| 11/30/2023 | From 10/01/2023 to 12/31/2023 | 0128-MD | MP, S&E -308 | 04239 - Misc. free oil in Western GOA, OCS                                                           |       | 02/29/2024 | Missing    |
|            |                               |         |              | 51726 - Critical Dilution                                                                            |       |            |            |
|            |                               |         |              | 51726 - Critical Dilution                                                                            |       |            |            |
|            |                               |         |              | 51938 - Miscellaneous Discharge Toxicity [Subsea Discharges] [Americamysis bahia (Mysidopsis bahia)] |       |            |            |
|            |                               |         |              | 51939 - Miscellaneous Discharge Toxicity [Subsea Discharges] [Menidia beryllina]                     |       |            |            |
|            |                               |         |              | 51940 - Miscellaneous Discharges [Pipeline Brine] [Free Oil]                                         |       |            |            |
|            |                               |         |              | 51941 - Miscellaneous Discharges [Pipeline Brine] [Oil & Grease]                                     |       |            |            |
|            |                               |         |              | 74076 - Flow                                                                                         |       |            |            |

|            |                               |         |              |                                                                                                      |  |            |         |
|------------|-------------------------------|---------|--------------|------------------------------------------------------------------------------------------------------|--|------------|---------|
|            |                               |         |              | TOP3E - NOEC Lethal Static Renewal 7 Day Chronic Americamysis bahia (formerly Mysidopsis bahia)      |  |            |         |
|            |                               |         |              | TOP6J - NOEC Lethal Static Renewal 7 Day Chronic Menidia beryllina                                   |  |            |         |
|            |                               |         |              | TPP3E - NOEC Sub-Lethal Static Renewal 7 Day Chronic Americamysis bahia (formerly Mysidopsis bahia)  |  |            |         |
|            |                               |         |              | TPP6J - NOEC Sub-Lethal Static Renewal 7 Day Chronic Menidia beryllina                               |  |            |         |
| 10/31/2023 | From 10/01/2023 to 12/31/2023 | 0128-MD | MP, S&E -308 | 04239 - Misc. free oil in Western GOA, OCS                                                           |  | 02/29/2024 | Missing |
|            |                               |         |              | 51726 - Critical Dilution                                                                            |  |            |         |
|            |                               |         |              | 51726 - Critical Dilution                                                                            |  |            |         |
|            |                               |         |              | 51938 - Miscellaneous Discharge Toxicity [Subsea Discharges] [Americamysis bahia (Mysidopsis bahia)] |  |            |         |
|            |                               |         |              | 51939 - Miscellaneous Discharge Toxicity [Subsea Discharges] [Menidia beryllina]                     |  |            |         |
|            |                               |         |              | 51940 - Miscellaneous Discharges [Pipeline Brine] [Free Oil]                                         |  |            |         |
|            |                               |         |              | 51941 - Miscellaneous Discharges [Pipeline Brine] [Oil & Grease]                                     |  |            |         |
|            |                               |         |              | 74076 - Flow                                                                                         |  |            |         |
|            |                               |         |              | TOP3E - NOEC Lethal Static Renewal 7 Day Chronic Americamysis bahia (formerly Mysidopsis bahia)      |  |            |         |
|            |                               |         |              | TOP6J - NOEC Lethal Static Renewal 7 Day Chronic Menidia beryllina                                   |  |            |         |
|            |                               |         |              | TPP3E - NOEC Sub-Lethal Static Renewal 7 Day Chronic Americamysis bahia (formerly Mysidopsis bahia)  |  |            |         |
|            |                               |         |              | TPP6J - NOEC Sub-Lethal Static Renewal 7 Day Chronic Menidia beryllina                               |  |            |         |
| 09/30/2023 | From 07/01/2023 to 09/30/2023 | 0128-MD | MP, S&E -308 | 04239 - Misc. free oil in Western GOA, OCS                                                           |  | 11/30/2023 | Missing |
|            |                               |         |              | 51726 - Critical Dilution                                                                            |  |            |         |
|            |                               |         |              | 51726 - Critical Dilution                                                                            |  |            |         |
|            |                               |         |              | 51938 - Miscellaneous Discharge Toxicity [Subsea Discharges] [Americamysis bahia (Mysidopsis bahia)] |  |            |         |
|            |                               |         |              | 51939 - Miscellaneous Discharge Toxicity [Subsea Discharges] [Menidia beryllina]                     |  |            |         |

|            |                               |         |              |                                                                                                      |       |            |            |
|------------|-------------------------------|---------|--------------|------------------------------------------------------------------------------------------------------|-------|------------|------------|
|            |                               |         |              | 51940 - Miscellaneous Discharges [Pipeline Brine] [Free Oil]                                         |       |            |            |
|            |                               |         |              | 51941 - Miscellaneous Discharges [Pipeline Brine] [Oil & Grease]                                     |       |            |            |
|            |                               |         |              | 74076 - Flow                                                                                         |       |            |            |
|            |                               |         |              | TOP3E - NOEC Lethal Static Renewal 7 Day Chronic Americamysis bahia (formerly Mysidopsis bahia)      |       |            |            |
|            |                               |         |              | TOP6J - NOEC Lethal Static Renewal 7 Day Chronic Menidia beryllina                                   |       |            |            |
|            |                               |         |              | TPP3E - NOEC Sub-Lethal Static Renewal 7 Day Chronic Americamysis bahia (formerly Mysidopsis bahia)  |       |            |            |
|            |                               |         |              | TPP6J - NOEC Sub-Lethal Static Renewal 7 Day Chronic Menidia beryllina                               |       |            |            |
| 08/31/2023 | From 07/01/2023 to 09/30/2023 | 0128-MD | MP, S&E -308 | 04239 - Misc. free oil in Western GOA, OCS                                                           |       | 11/30/2023 | Missing    |
|            |                               |         |              | 51726 - Critical Dilution                                                                            |       |            |            |
|            |                               |         |              | 51726 - Critical Dilution                                                                            |       |            |            |
|            |                               |         |              | 51938 - Miscellaneous Discharge Toxicity [Subsea Discharges] [Americamysis bahia (Mysidopsis bahia)] |       |            |            |
|            |                               |         |              | 51939 - Miscellaneous Discharge Toxicity [Subsea Discharges] [Menidia beryllina]                     |       |            |            |
|            |                               |         |              | 51940 - Miscellaneous Discharges [Pipeline Brine] [Free Oil]                                         |       |            |            |
|            |                               |         |              | 51941 - Miscellaneous Discharges [Pipeline Brine] [Oil & Grease]                                     |       |            |            |
|            |                               |         |              | 74076 - Flow                                                                                         |       |            |            |
|            |                               |         |              | TOP3E - NOEC Lethal Static Renewal 7 Day Chronic Americamysis bahia (formerly Mysidopsis bahia)      |       |            |            |
|            |                               |         |              | TOP6J - NOEC Lethal Static Renewal 7 Day Chronic Menidia beryllina                                   |       |            |            |
|            |                               |         |              | TPP3E - NOEC Sub-Lethal Static Renewal 7 Day Chronic Americamysis bahia (formerly Mysidopsis bahia)  |       |            |            |
|            |                               |         |              | TPP6J - NOEC Sub-Lethal Static Renewal 7 Day Chronic Menidia beryllina                               |       |            |            |
| 07/31/2023 | From 07/01/2023 to 09/30/2023 | 0041-PR | MP, S&E -311 | 00010 - Temperature, water deg. centigrade                                                           | **E** | 11/30/2023 | 11/14/2023 |

|            |                                  |         |              |                                                                                                      |  |            |         |
|------------|----------------------------------|---------|--------------|------------------------------------------------------------------------------------------------------|--|------------|---------|
| 07/31/2023 | From 07/01/2023<br>to 09/30/2023 | 0128-MD | MP, S&E -308 | 04239 - Misc. free oil in Western GOA, OCS                                                           |  | 11/30/2023 | Missing |
|            |                                  |         |              | 51726 - Critical Dilution                                                                            |  |            |         |
|            |                                  |         |              | 51726 - Critical Dilution                                                                            |  |            |         |
|            |                                  |         |              | 51938 - Miscellaneous Discharge Toxicity [Subsea Discharges] [Americamysis bahia (Mysidopsis bahia)] |  |            |         |
|            |                                  |         |              | 51939 - Miscellaneous Discharge Toxicity [Subsea Discharges] [Menidia beryllina]                     |  |            |         |
|            |                                  |         |              | 51940 - Miscellaneous Discharges [Pipeline Brine] [Free Oil]                                         |  |            |         |
|            |                                  |         |              | 51941 - Miscellaneous Discharges [Pipeline Brine] [Oil & Grease]                                     |  |            |         |
|            |                                  |         |              | 74076 - Flow                                                                                         |  |            |         |
|            |                                  |         |              | TOP3E - NOEC Lethal Static Renewal 7 Day Chronic Americamysis bahia (formerly Mysidopsis bahia)      |  |            |         |
|            |                                  |         |              | TOP6J - NOEC Lethal Static Renewal 7 Day Chronic Menidia beryllina                                   |  |            |         |
|            |                                  |         |              | TPP3E - NOEC Sub-Lethal Static Renewal 7 Day Chronic Americamysis bahia (formerly Mysidopsis bahia)  |  |            |         |
|            |                                  |         |              | TPP6J - NOEC Sub-Lethal Static Renewal 7 Day Chronic Menidia beryllina                               |  |            |         |

**ATTACHMENT C**  
**BSEE Inspection Report Violations**  
**GMG290235**  
**Permitted Feature 0222**

Inspection Date: 05/28/2024

BSEE Inspection ID: 475839113

Records Review Period: 04/01/2022 – 03/31/2024

Lease Area/Block: Grand Isle 43

| <b>PF/Limit Set</b> | <b>Description of Violations</b>                                                                                                                | <b>Violation Date(s)</b> | <b>Permit Citation</b> |
|---------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|------------------------|
| 0222                | The facility does not have a Best Management Plan (BMP) for containment of waste materials from sandblasting or similar maintenance activities. | 05/28/2024               | Part I, Sec. C, 6      |
| 0222-DW             | Washing machines discharge directly to sea and visible foam was witnessed.                                                                      | 05/28/2024               | Part I, Sec. B, 9, a   |
| 0222-SW             | The facility is unable to chlorinate their bypass line on the marine sanitation device (MSD).                                                   | 05/28/2024               | Part II, Sec B, 3, a   |