



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270-2102

February 22, 2022

TRANSMITTED VIA EMAIL

Mr. Shane Broussard, Product Line Manager
Siemens Energy, Inc.
411 Commercial Parkway
Broussard, Louisiana 70518
shane.broussard@siemens-energy.com

Re: Administrative Order, Docket Number: CWA-06-2022-1744
NPDES Permit: GMG290373

Dear Mr. Broussard:

Enclosed is an Administrative Order (AO) issued by the United States Environmental Protection Agency, Region 6 (EPA) to Siemens Energy, Inc. (Siemens) for violations of the Clean Water Act, 33 U.S.C. §§ 1251-1387. This AO requires Siemens to comply with the provisions set forth in the attached AO for violations identified during a review of non-receipt Discharge Monitoring Reports from October 1, 2020 to January 1, 2022. EPA requests that you immediately confirm receipt of this e-mail and the attached AO by a response e-mail to Kayla Woods, woods.kayla@epa.gov.

This AO does not assess a monetary penalty; however, it does require compliance with applicable federal regulations. The first compliance deadline is within thirty days of receipt of this AO. EPA is committed to ensuring compliance with the requirements of the National Pollutant Discharge Elimination System (NPDES) program, and my staff will assist you in any way possible. Please reference AO Docket Number CWA-06-2022-1744 and NPDES Permit Number GMG290373 in your response.

EPA acknowledges that the COVID-19 pandemic may impact your business and operations. If this is the case, please contact us regarding any specific issues you need to discuss. If you need additional time to respond to this AO or if you have any questions relating to this AO, please contact Kayla Woods, of my staff, at (214) 665-6482.

Sincerely,

A handwritten signature in black ink, reading "Cheryl T. Seager", is positioned above the typed name.

Digitally signed by Seager, Cheryl
DN: cn=Seager, Cheryl,
email=Seager.Cheryl@epa.gov
Date: 2022.02.22 15:03:46 -06'00'

Cheryl T. Seager, Director
Enforcement and
Compliance Assurance Division

ec: T.J. Broussard, Regional Environmental Officer
t.j.broussard@bsee.gov



U.S. ENVIRONMENTAL PROTECTION AGENCY - REGION 6

FINDINGS OF VIOLATION AND COMPLIANCE ORDER

In the Matter of: Siemens Energy, Inc.

Docket No.: CWA-06-2022-1744 NPDES No.: GMG290373

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. Siemens Energy, Inc. (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, 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 411 Commercial Parkway, Broussard, Louisiana, 70518.
3. At all relevant times, the facilities are considered "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(12) and (14) of the Act, 33 U.S.C. § 1362(12), (14), 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 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 "Final NPDES General Permit for New and Existing Sources and New Dischargers in the Offshore Subcategory of the Oil and Gas Extraction 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, 77 Fed. Reg. 61605. 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 E). The permit does, however, authorize the discharge of produced water to the Central and Western portions of Federal Waters of the Gulf of Mexico from wells located in lease blocks, and is available on the Internet at https://www.epa.gov/sites/production/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.
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 October 1, 2020 to January 1, 2022.

11. Part II.D.4 of the permit was violated in that the Respondent had multiple non-receipt violations. The violations identified include: incomplete DMRs and failure to submit DMRs to EPA within 60 days following the end of the quarterly monitoring period. The DMR non-receipt violations are specified in Attachment A, which is incorporated by reference, for permitted feature (0006). Respondent must submit all missing DMRs sample analysis and limit sets to meet the requirements outlined in Paragraph 13 of this Order.

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

SECTION 309(a)(3) COMPLIANCE ORDER

13. Based on the foregoing Findings and pursuant to the authority of Section 309(a)(3) of the Act, EPA hereby orders Respondent to take the following action:

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

B. 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.

C. 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 mitigation 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 mitigation of the violations within the shortest possible time, as well as measures to prevent these similar violations from reoccurring. Any approved compliance schedule will be incorporated and reissued in a future administrative order.

D. If you have questions or comment on this matter, please contact Kayla Woods of my staff, at (214) 665-6482.

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

Ms. Kayla Woods
Water Enforcement Branch (ECDWE)
EPA, Region 6
1201 Elm Street, Suite 500
Dallas, TX 75270
woods.kayla@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, which states the scope of such review.

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.

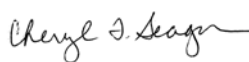
This Order does not constitute a waiver or modification of the terms or conditions of Respondent's NPDES permit which remain in full force and effect.

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.

February 22, 2022

Date



Digitally signed by Seager, Cheryl
DN: cn=Seager, Cheryl,
email=Seager.Cheryl@epa.gov
Date: 2022.02.22 15:02:59 -06'00'

Cheryl T. Seager, Director
Enforcement and
Compliance Assurance Division

Docket Number: CWA-06-2022-1744

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ATTACHMENT A

NPDES ID(s): GMG290373
 State: GM
 Major/Minor Indicator: Minor
 Violation Date: 10/01/2020 - 01/01/2022
 Violation Type(s): DMR Non-Receipt

Environmental Protection Agency Integrated Compliance Information System (ICIS) DMR Non-Receipt Violations Report

Created Date: 09/15/2010
 Refresh Date: 02/07/2022
 Report Version 1.5, Modified: 1/4/2017

Permittee Name:	SIEMENS ENERGY, INC.	Primary SIC Code:	1311	Permit Issued:	10/01/2017
Permittee Address:	411 COMMERCIAL PARKWAY BROUSSARD, LA 70518	Primary SIC Desc:	Crude Petroleum And Natural Gas	Permit Effective:	10/01/2017
Major/Minor Indicator:	Minor	Primary NAICS Code:		Permit Expired:	09/30/2022
Compliance Track. Status:	On	Primary NAICS Desc:		Permit Status:	Effective
DMR Non Receipt Flag:	On	Cognizant Official:	BENJAMIN POTIER, DIRECTOR OP'S		
RNC Tracking Flag:	On	Cognizant Offcl. Ph.:	337-837-3071		
		Receiving Body:			

Facility Information					
Facility Name:	SIEMENS ENERGY, INC.	County:	Lafayette	FRS ID:	110031361602
Facility Location:	411 COMMERCIAL PARKWAY BROUSSARD, LA 70518	Region:	06	Federal Facility Ownership:	N
		State-Region:		Type of Ownership:	

ICIS Whole DMR and/or Individual Limit Set Non-Receipt Violations											
Violation Code	Monitoring Period End Date	Monitoring Period	Limit Set	Lease Area/Block	Parameter	Mon. Loc.	DMR Value	NODI Code	DMR Due Date	DMR Submission Date	DMR Late Flag
D80	09/30/2021	From 07/01/2021 to 09/30/2021	0006-CT	Green Canyon-641	04239 - Misc. free oil in Western GOM, OCS	1	C3	C	11/30/2021	02/01/2022	
D80	09/30/2021	From 07/01/2021 to 09/30/2021	0006-CT	Green Canyon-641	51712 - Whole Effluent Toxicity [WET] - M. beryllina	1	Q2	C	11/30/2021	02/01/2022	
D80	09/30/2021	From 07/01/2021 to 09/30/2021	0006-CT	Green Canyon-641	51713 - Whole Effluent Toxicity [WET] - M. bahia	1	Q2	C	11/30/2021	02/01/2022	
D80	09/30/2021	From 07/01/2021 to 09/30/2021	0006-CT	Green Canyon-641	51726 - Critical Dilution	1	C3	C	11/30/2021	02/01/2022	
D80	09/30/2021	From 07/01/2021 to 09/30/2021	0006-CT	Green Canyon-641	74076 - Flow	1	Q2	C	11/30/2021	02/01/2022	
D80	09/30/2021	From 07/01/2021 to 09/30/2021	0006-CT	Green Canyon-641	TEM3E - LF Pass/Fail Statre 48Hr Acute Mysidopsis Bahia	1	C3	C	11/30/2021	02/01/2022	
D80	09/30/2021	From 07/01/2021 to 09/30/2021	0006-CT	Green Canyon-641	TEM6B - Low Flow Pass/Fail Static Renewal 48Hr Acute Menidia menidia	1	C3	C	11/30/2021	02/01/2022	
D80	09/30/2021	From 07/01/2021 to 09/30/2021	0006-CT	Green Canyon-641	TOM3E - NOEC Lethal Static Renewal 48HR Acute Americamysis bahia	1	C3	C	11/30/2021	02/01/2022	
D80	09/30/2021	From 07/01/2021 to 09/30/2021	0006-CT	Green Canyon-641	TOM6B - NOEC Lethal Static Renewal 48HR Acute Menidia menidia	1	C3	C	11/30/2021	02/01/2022	
D80	09/30/2021	From 07/01/2021 to 09/30/2021	0006-CT	Green Canyon-641	TQM3E - Coef Of Var Statre 48Hr Acute Mysid. Bahia	1	C3	C	11/30/2021	02/01/2022	
D80	09/30/2021	From 07/01/2021 to 09/30/2021	0006-CT	Green Canyon-641	TQM6B - Coef Of Var Static Renewal 48Hr Acute Menidia menidia	1	C3	C	11/30/2021	02/01/2022	

D80	09/30/2021	From 07/01/2021 to 09/30/2021	0006-DC	Green Canyon-641	82595 - Drill cuttings, free oil	1	C3	C	11/30/2021	02/01/2022
D80	09/30/2021	From 07/01/2021 to 09/30/2021	0006-DD	Green Canyon-641	82597 - Deck drainage, free oil	1	C3	C	11/30/2021	02/01/2022
D90	09/30/2021	From 07/01/2021 to 09/30/2021	0006-DF	Green Canyon-641	04311 - Drilling fluid, end of well, 96-hr LC50	1	C1	C	11/30/2021	02/01/2022
D90	09/30/2021	From 07/01/2021 to 09/30/2021	0006-DF	Green Canyon-641	04312 - Drilling fluid, toxicity	1	C1	C	11/30/2021	02/01/2022
D90	09/30/2021	From 07/01/2021 to 09/30/2021	0006-DF	Green Canyon-641	04312 - Drilling fluid, toxicity	1	C2	C	11/30/2021	02/01/2022
D90	09/30/2021	From 07/01/2021 to 09/30/2021	0006-DF	Green Canyon-641	78244 - Cadmium [Cd], in barite, dry weight	1	C3	C	11/30/2021	02/01/2022
D90	09/30/2021	From 07/01/2021 to 09/30/2021	0006-DF	Green Canyon-641	78245 - Mercury [Hg], in barite, dry weight	1	C3	C	11/30/2021	02/01/2022
D80	09/30/2021	From 07/01/2021 to 09/30/2021	0006-DF	Green Canyon-641	82589 - Drilling fluids, free oil	1	C3	C	11/30/2021	02/01/2022
D90	09/30/2021	From 07/01/2021 to 09/30/2021	0006-DF	Green Canyon-641	82592 - Drilling fluids, discharge rate	1	Q2	C	11/30/2021	02/01/2022
D80	09/30/2021	From 07/01/2021 to 09/30/2021	0006-MD	Green Canyon-641	04239 - Misc. free oil in Western GOM, OCS	1	C3	C	11/30/2021	02/01/2022
D80	09/30/2021	From 07/01/2021 to 09/30/2021	0006-MD	Green Canyon-641	51726 - Critical Dilution	1	C3	C	11/30/2021	02/01/2022
D90	09/30/2021	From 07/01/2021 to 09/30/2021	0006-MD	Green Canyon-641	51938 - Miscellaneous Discharge Toxicity [Subsea Discharges] [Mysidopsis bahia]	1	C1	C	11/30/2021	02/01/2022
D90	09/30/2021	From 07/01/2021 to 09/30/2021	0006-MD	Green Canyon-641	51939 - Miscellaneous Discharge Toxicity [Subsea Discharges] [Menidia beryllina]	1	C1	C	11/30/2021	02/01/2022
D80	09/30/2021	From 07/01/2021 to 09/30/2021	0006-MD	Green Canyon-641	51940 - Miscellaneous Discharges [Pipeline Brine] [Free Oil]	1	C3	C	11/30/2021	02/01/2022
D90	09/30/2021	From 07/01/2021 to 09/30/2021	0006-MD	Green Canyon-641	51941 - Miscellaneous Discharges [Pipeline Brine] [Oil & Grease]	1	C3	C	11/30/2021	02/01/2022
D80	09/30/2021	From 07/01/2021 to 09/30/2021	0006-MD	Green Canyon-641	TOP3E - NOEC Lethal Static Renewal 7 Day Chronic Americamysis bahia	1	C3	C	11/30/2021	02/01/2022
D80	09/30/2021	From 07/01/2021 to 09/30/2021	0006-MD	Green Canyon-641	TOP6B - NOEC Lethal Static Renewal 7 Day Chronic Menidia menidia	1	C3	C	11/30/2021	02/01/2022
D80	09/30/2021	From 07/01/2021 to 09/30/2021	0006-MD	Green Canyon-641	TPP3E - NOEC Sub-Lethal Static Renewal 7 Day Chronic Americamysis bahia	1	C3	C	11/30/2021	02/01/2022
D80	09/30/2021	From 07/01/2021 to 09/30/2021	0006-MD	Green Canyon-641	TPP6B - NOEC Sub-Lethal Static Renewal 7 Day Chronic Menidia menidia	1	C3	C	11/30/2021	02/01/2022
D90	09/30/2021	From 07/01/2021 to 09/30/2021	0006-SB	Green Canyon-641	51114 - Stock base fluid, PAH	1	C3	C	11/30/2021	02/01/2022
D90	09/30/2021	From 07/01/2021 to 09/30/2021	0006-SB	Green Canyon-641	51115 - Stock base fluid, sediment toxicity	1	C3	C	11/30/2021	02/01/2022
D90	09/30/2021	From 07/01/2021 to 09/30/2021	0006-SB	Green Canyon-641	51116 - Stock base fluid, biodegradation rate	1	C3	C	11/30/2021	02/01/2022
D90	09/30/2021	From 07/01/2021 to 09/30/2021	0006-SB	Green Canyon-641	51117 - Discharge drill cuttings, sediment toxicity	P	C3	C	11/30/2021	02/01/2022
D90	09/30/2021	From 07/01/2021 to 09/30/2021	0006-SB	Green Canyon-641	51117 - Discharge drill cuttings, sediment toxicity	R	C3	C	11/30/2021	02/01/2022
D80	09/30/2021	From 07/01/2021 to 09/30/2021	0006-SB	Green Canyon-641	51118 - Discharge drill cuttings, formation oil	S	C3	C	11/30/2021	02/01/2022

D80	09/30/2021	From 07/01/2021 to 09/30/2021	0006-SB	Green Canyon-641	51118 - Discharge drill cuttings, formation oil	T	C3	C	11/30/2021	02/01/2022
D90	09/30/2021	From 07/01/2021 to 09/30/2021	0006-SB	Green Canyon-641	51120 - Discharge drill cuttings, base fluids retained	U	C2	C	11/30/2021	02/01/2022
D90	09/30/2021	From 07/01/2021 to 09/30/2021	0006-SB	Green Canyon-641	51120 - Discharge drill cuttings, base fluids retained	V	C2	C	11/30/2021	02/01/2022
D80	09/30/2021	From 07/01/2021 to 09/30/2021	0006-SB	Green Canyon-641	51120 - Discharge drill cuttings, base fluids retained	W	Q2	C	11/30/2021	02/01/2022
D90	09/30/2021	From 07/01/2021 to 09/30/2021	0006-WF	Green Canyon-641	04379 - Well fluids, oil & grease	1	C2	C	11/30/2021	02/01/2022
D90	09/30/2021	From 07/01/2021 to 09/30/2021	0006-WF	Green Canyon-641	04379 - Well fluids, oil & grease	1	C3	C	11/30/2021	02/01/2022
D80	09/30/2021	From 07/01/2021 to 09/30/2021	0006-WF	Green Canyon-641	82603 - Well fluids, free oil	1	C3	C	11/30/2021	02/01/2022
D80	09/30/2021	From 07/01/2021 to 09/30/2021	0006-WM	Green Canyon-641	85866 - Maintenance Waste: Do you have a BMP?	1	C3	C	11/30/2021	02/01/2022
D80	09/30/2021	From 07/01/2021 to 09/30/2021	0006-WM	Green Canyon-641	85867 - Maintenance Waste: Are you using a BMP?	1	C3	C	11/30/2021	02/01/2022
D90	06/30/2021	From 04/01/2021 to 06/30/2021	0006-WF	Green Canyon-641	04379 - Well fluids, oil & grease	1	C2		08/30/2021	02/01/2022
D90	06/30/2021	From 04/01/2021 to 06/30/2021	0006-WF	Green Canyon-641	04379 - Well fluids, oil & grease	1	C3		08/30/2021	02/01/2022
D80	06/30/2021	From 04/01/2021 to 06/30/2021	0006-WF	Green Canyon-641	82603 - Well fluids, free oil	1	C3		08/30/2021	02/01/2022