

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	03/11/2025	
Media Program:	Water (CWA)	
Regulatory Program(s)	NPDES Offshore Program	
Company Name:	Shell Offshore, Inc.	
Facility Name:	The Salsa – Production Facility (Permitted Feature 0025)	
Facility Physical Location:	Garden Banks 172 at 27.8403 degrees N, 91.9878 degrees W	
(city, state, zip code)	Gulf of America – U.S. Federal Waters	
Mailing address:	P.O. Box 61933	
(city, state, zip code)	New Orleans, LA 70161-1933	
County/Parish:	Orleans Parish	
Facility Phone Number	(504) 425-4929	
Facility Contact:	Morris J. Jones	Senior Environmental Engineer
	Morris.Jones@shell.com	
Complex ID:	90014	
Identification/Permit Number:	GMG290103	
OSC Lease:	G14221	
BSEE Inspection ID No.:	546264166	
Facility Description:	A fixed platform	
Personnel participating in inspection:		
Kerri McCabe (lead)	EPA / Region 6 ECDW	Inspector / Enforcement Officer
Michael Blaha	EPA / Region 6 ECDW	Inspector / Enforcement Officer
Ronald McClary	BSEE / GOA OCS Region	Water Quality Coordinator, Engineer
Kimberly Ward	BSEE / GOA OCS Region	Water Quality Coordinator, Engineer
EPA Lead Inspector Signature/Date		
	Kerri McCabe	Date
Supervisor Signature/Date		
	Jeanne Eckhart	Date

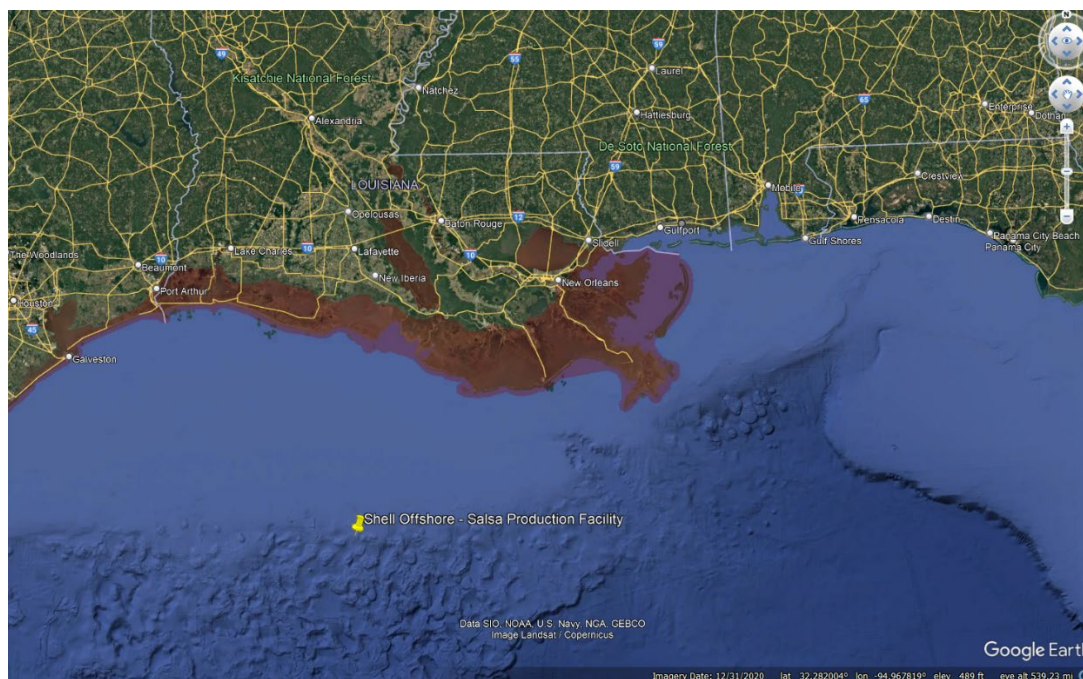
Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Kerri McCabe (lead) and Michael Blaha and Bureau of Safety and Environmental Enforcement (BSEE) inspectors Ronald McClary and Kimberly Ward arrived at the Shell Offshore, Inc. (“Shell”) – The Salsa-Production Facility at 10:00am on March 11, 2025, for an unannounced Compliance Evaluation Inspection (CEI) of the EPA National Pollutant Discharge Elimination System (NPDES) general permit GMG290103 and the BSEE Pollution Prevention and Control Regulations. After initial facility entry, we met with the facility operator Joseph Prejean. The Shell point of contact is Morris Jones at Morris.Jones@shell.com. All observations recorded for this inspection were stated verbally by the facility personnel in the inspection interview, obtained from the facility written records, or obtained from records submitted to EPA and contained on the data website entitled the Integrated Compliance Information System (ICIS). Background information in support of this report was obtained from the Technical Information Management System (TIMS) database maintained by BSEE and the Bureau of Ocean Energy Management (BOEM) and the United States Coast Guard (USCG) National Response Center (NRC) reporting system reviewed by BSEE daily.

FACILITY DESCRIPTION

The Salsa - Production Facility (Complex ID No. 90014) is a fixed platform installed in 1998 and operated by Shell Offshore, Inc. The facility is located in the Garden Banks 172 lease block, approximately 104 miles offshore from Louisiana's coast, at an approximate water depth of 693 feet. The facility presently supports oil and gas processing equipment, pumping equipment, fuel and chemical storage, and living quarters. This facility processed, on average, approximately 5,000 barrels of oil per day (BOPD) and 17 MSCF/day of natural gas. The facility is manned 24/7 and houses approximately 17 personnel during normal operations.



Map 1. Google Earth aerial image dated 12/31/2020 of the Shell Offshore, Inc. – Salsa – Production Facility location.

The EPA general permit number for Shell Offshore, Inc. is **GMG290103** and the Discharge Monitoring Report (DMR) Permitted Feature ID number for this platform is **0025**. EPA assigned the DMR Limit Set Name for this facility as “Salsa – Production Facility.” For reporting, EPA has assigned DMR Limit Set Designators as follows:

Salsa – Production Facility (Permitted Feature 0025):

- BMP (Maintenance Best Management Plan)
- CT (Chemically Treated Waters)
- 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 Mud Cuttings)
- SW (Sanitary Waste)
- TC (Well Treatment Fluids, Completion Fluids, Workover Fluids)
- WF (Well Fluids)

There is no requirement for a CW (cooling water intake) Limit Set Designator reporting to EPA due to the age of the facility. The CW limit set applies if the facility was constructed after July 17, 2006.

Section II – SUMMARY OF INSPECTION

The inspection consisted of:

- An interview of personnel about their work practices and procedures,
- A records review of facility data and observation logs,
- A review of the reporting history to EPA for facility discharge data and values based on the facility raw data records and the certified values reported on official DMRs to EPA,
- An observation of any in-house, on-site procedures, and methodology,
- A review of facility plans and documentation,
- A review of the facility’s Uniform Waste Manifests for removal of materials and solids from the facility for proper disposal,
- A review of the facility spill and release history from NRC reports,
- A review of BSEE environmental enforcement actions,
- A facility tour and review of general housekeeping practices, with a special emphasis on viewing containment and any treatment systems utilized, including the facility’s Marine Sanitation Device (MSD; see Photos No. 1 and No. 2).

Section III – AREAS OF CONCERN

During this inspection, there were observed areas of potential concern related to the environmental compliance of this facility:

- At the time of inspection, foam was witnessed coming from the clothes washer line (gray water) discharge, and
- The facility sends their overboard water to the Shell Enchilada facility. BSEE is seeking guidance from EPA if this complies with the NPDES general permit.

Section IV – LIST OF APPENDICES

Appendix 1 – Photograph Log – 4 photos taken 03/11/2025.

The official inspection report, completed by BSEE, will be sent to the U.S. EPA Region 6 within the next few weeks. Once received, the assigned enforcement officer, will evaluate the report for any compliance issues and determine if an enforcement action is necessary.

Appendix 1

Photograph Log

4 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Garden Banks 172, approximately 104 miles offshore from Louisiana's coast, at an approximate water depth of 693 feet.

City: Lafayette

County/Parish: Lafayette

State: GOA



Photo File Name: 100-0760

Orientation: 62° ENE

Date of Photo: 03/11/2025

Time of Photo: 1154

Latitude: 27.840433

Longitude: -91.987417

Photographer: Kerri McCabe

Description: Looking ENE, this photo shows the Marine Sanitation Device (MSD) manufacturer's plate.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Garden Banks 172, approximately 104 miles offshore from Louisiana's coast, at an approximate water depth of 693 feet.

City: Lafayette

County/Parish: Lafayette

State: GOA



Photo File Name: 100-0761

Orientation: 93° E

Date of Photo: 03/11/2025

Time of Photo: 1154

Latitude: 27.840494

Longitude: -91.987417

Photographer: Kerri McCabe

Description: Looking E, this photo shows an overview of the MSD from Photo No. 1.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Garden Banks 172, approximately 104 miles offshore from Louisiana's coast, at an approximate water depth of 693 feet.

City: Lafayette

County/Parish: Lafayette

State: GOA



Photo File Name: 100-0762

Orientation: 52° NE

Date of Photo: 03/11/2025

Time of Photo: 1209

Latitude: 27.840733

Longitude: -91.987600

Photographer: Kerri McCabe

Description: Looking NE, this photo shows persistent foam from a domestic (gray water) line.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Garden Banks 172, approximately 104 miles offshore from Louisiana's coast, at an approximate water depth of 693 feet.		
City: Lafayette	County/Parish: Lafayette	State: GOA



Photo File Name: 100-0764

Orientation: 47° NE

Date of Photo: 03/11/2025

Time of Photo: 1209

Latitude: 27.840667

Longitude: -91.987517

Photographer: Kerri McCabe

Description: Looking NE, this photo shows a closeup of the foam from Photo No. 3.