

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	05/20/2025	
Media Program:	Water (CWA)	
Regulatory Program(s)	NPDES Offshore Program	
Company Name:	Talos Petroleum, LLC	
Facility Name:	Ram Powell Facility (Permitted Feature 0660)	
Facility Physical Location:	Viosca Knoll 956 at 29.0606°N, -88.0917°W	
(city, state, zip code)	Gulf of America – U.S. Federal Waters	
Mailing address:	333 Clay Street, Suite 3300	
(city, state, zip code)	Houston, TX 77002	
County/Parish:	Orleans Parish	
Facility Phone Number	(713) 328-3026	
Facility Contact:	Trina Engels	
	Trina.engels@talosenergy.com	
Complex ID:	24229	
Identification/Permit Number:	GMG290188	
OSC Lease:	G06896	
BSEE Inspection ID No.:	553203957	
Facility Description:	A tension leg platform	
Personnel participating in inspection:		
Kerri McCabe	EPA / Region 6 ECDW	Inspector / Enforcement Officer
Michael Blaha (lead)	EPA / Region 6 ECDW	Inspector / Enforcement Officer
Ronald McClary	BSEE / GOA OCS Region	Water Quality Coordinator, Engineer
Doug Eubanks	Person in Charge	Facility Point of Contact
EPA Lead Inspector Signature/Date		
	Kerri McCabe for Michael Blaha	Date
Supervisor Signature/Date		
	Jeanne Eckhart	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

Environmental Protection Agency (EPA) Region 6 inspectors Michael Blaha (lead), Kerri McCabe, and Bureau of Safety and Environmental Enforcement (BSEE) inspector Ronald McClary arrived at the Talos Petroleum, LLC – Ram Powell Facility at 12:45 PM on 05/20/2025, for an announced Compliance Evaluation Inspection (CEI) of the EPA National Pollutant Discharge Elimination System (NPDES) general permit GMG290000 and the BSEE Pollution Prevention and Control Regulations. After initial facility entry, we met with the facility point of contact (PIC), Doug Eubanks. The Talos Petroleum, LLC point of contact is Trina Engels at trina.engels@talosenergy.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 Ram Powell Facility (Complex ID No. 24229) is a tension leg platform installed in 1997 and operated by Talos Petroleum, LLC. The facility is located in the Viosca Knoll 956 lease block, approximately 55 miles offshore from Louisiana's coast, at an approximate water depth of 3,216 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 9,800 BOPD, 1,700 BWPD, and 61.5 SCF/day. The facility is manned 24/7 and houses approximately 52 personnel during normal operations.



Map 1. Google Earth aerial image dated 12/31/2020 of the Talos Petroleum, LLC – Ram Powell Facility location.

The EPA general permit number for Talos Petroleum, LLC is **GMG290188** and the Discharge Monitoring Report (DMR) Permitted Feature ID number for this platform is **0660**, with the facility name Ram Powell Facility. Talos Petroleum, LLC submits DMR to EPA for the following Limit Set Designators:

Ram Powell Facility (Permitted Feature 0660):

- BMP (Maintenance Best Management Plan)
- CT (Chemically Treated Waters)
- DD (Deck Drainage)
- DW (Domestic Waste)
- HF (Hydrate Control Fluids)
- MD (Miscellaneous Discharges – Includes Packer Fluids & Pipeline Brine)
- MT (Miscellaneous Discharges – Chemically Treated)
- PM (Produced Water Monthly Toxicity)
- PR (Produced Water)
- SW (Sanitary Waste)

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 BSEE 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 an emphasis on viewing containment and treatment systems utilized, including the facility's Marine Sanitation Device (MSD; see Photos No. 1 through No. 4) and floatation cell (see Photos No. 11 through No. 12). EPA and BSEE also discussed and observed Talos Petroleum, LLC personnel collect produced water oil and grease sample (see Photos No. 5 through No. 10).

Section III – AREAS OF CONCERN

During this inspection, BSEE observed the following "Facility Inspection Observations" related to the environmental compliance of this facility:

- The facility had a deck drainage sheen in July 2023 (Part I, Sec. B, 3, a);
- Incomplete chains of custody (Part II, Sec. C, 4, a-g);

- Multiple oil and grease samples during the review focus period, received by the lab, had a pH greater than 2 (Part I, Sec. B, Note 1-2);
- The facility had a produced water effluent violation on October 2023 (Part I, Sec. B, 4, a);
- May 2023 methanol toxicity sample was received by lab without a chain of custody. The lab started a Chain of Custody upon receiving the sample (Part I, Sec. B, Note 1-2);
- Facility personnel is unfamiliar with sheen sampling protocols (Part I, Section B, 4, b)*;
- All facility discharges commingle in a caisson and discharge 400 feet below sea level (Part II, Sec. C, 2)*;
- October 2023 NPDES oil & grease results report the average of all samples, but not the individual samples (5) results. Received all sample results via separate excel document (Part II, Sec. D, 5);
- December 2023 NPDES oil and grease results report only one of the two sample results, received all sample results via separate excel document (Part II, Sec. D, 5);
- November 2024 NPDES oil and grease result (4.0 mg/L) reported does not match separate received Excel document (7.4 mg/L) (Part II, Sec. D, 4); and
- August 2023 lab checklist notes improper error correction(s) made by client (Part I, Sec. B, Note 1-2).

Section IV – LIST OF APPENDICES

Appendix 1 – Photograph Log – 12 photos taken 05/20/2025.

*Requested clarification from BSEE on 07/10/2025

The official inspection report, completed by BSEE, has been sent to the U.S. EPA, Region 6. 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 12 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Ram Powell Facility (0660) platform in Viosca Knoll 956 at 29.06085°N, -88.09148°W.		
City: New Orleans	County/Parish: New Orleans	State: Louisiana (GoA)



Photo File Name: R0010989

Orientation: 46° NE

Date of Photo: 05/20/2025

Time of Photo: 1:21 PM

Latitude: 29.06085

Longitude: -88.09148

Photographer: Kerri McCabe

Description: Looking NE, this photo shows an overview of the marine sanitation device (MSD) utilized at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Ram Powell Facility (0660) platform in Viosca Knoll 956 at 29.06085°N, -88.09148°W.		
City: New Orleans	County/Parish: New Orleans	State: Louisiana (GoA)



Photo File Name: R0010990

Orientation: 24° NNE

Date of Photo: 05/20/2025

Time of Photo: 1:21 PM

Latitude: 29.0609

Longitude: -88.09144

Photographer: Kerri McCabe

Description: Looking NNE, this photo shows the marine sanitation device (MSD) plate.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Ram Powell Facility (0660) platform in Viosca Knoll 956 at 29.06085°N, -88.09148°W.		
City: New Orleans	County/Parish: New Orleans	State: Louisiana (GoA)

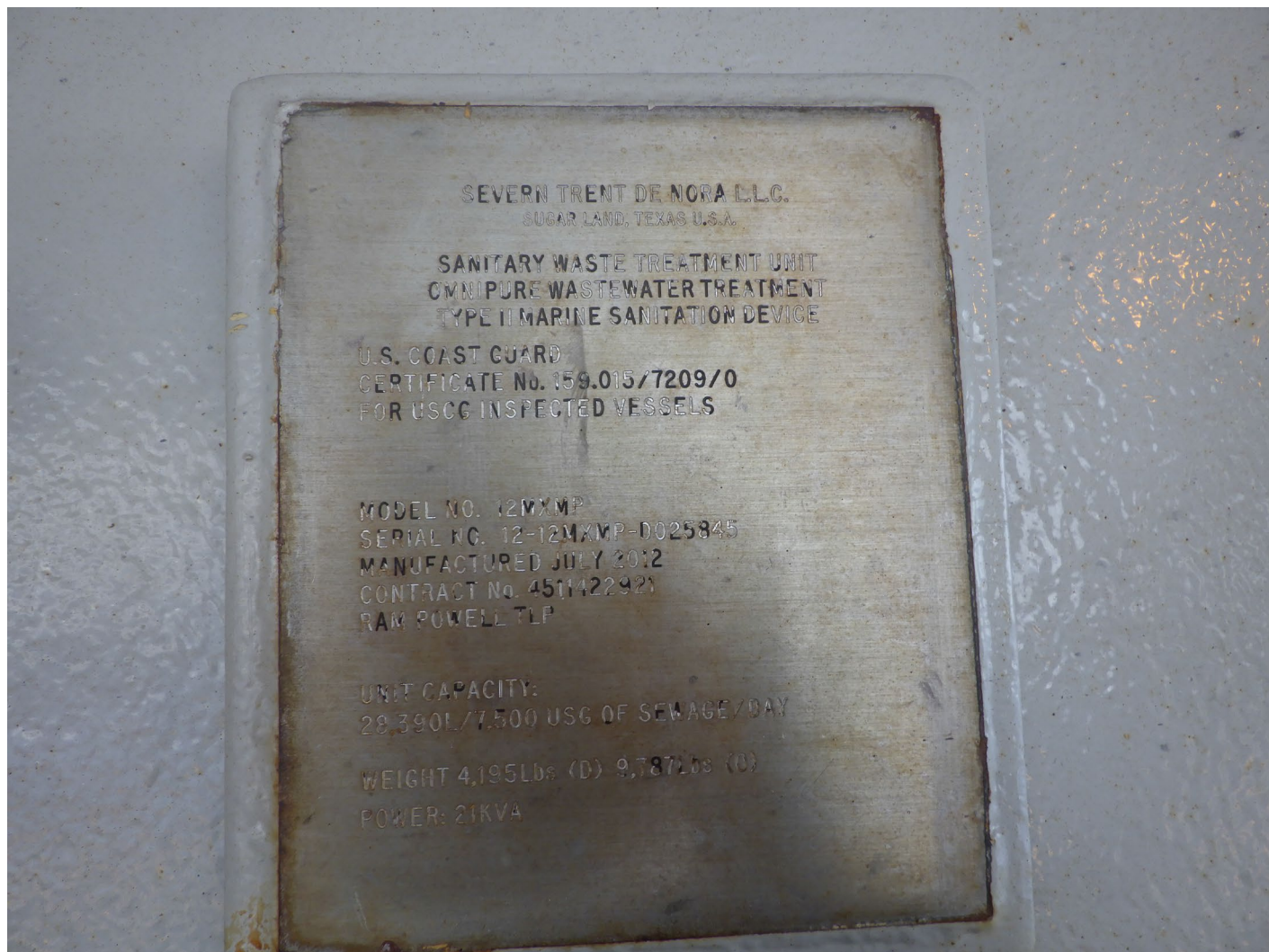


Photo File Name: R0010991

Orientation: 13° NNE

Date of Photo: 05/20/2025

Time of Photo: 1:21 PM

Latitude: 28.906088

Longitude: -88.09141

Photographer: Kerri McCabe

Description: Looking NNE, this photo shows the marine sanitation device (MSD) USCG plate.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Ram Powell Facility (0660) platform in Viosca Knoll 956 at 29.06085°N, -88.09148°W.		
City: New Orleans	County/Parish: New Orleans	State: Louisiana (GoA)



Photo File Name: R0010994

Orientation: 22° NNE

Date of Photo: 05/20/2025

Time of Photo: 1:22 PM

Latitude: 29.0609

Longitude: -88.09155

Photographer: Kerri McCabe

Description: Looking NNE, this photo shows chlorine tablets inside the chlorinator for the MSD for the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Ram Powell Facility (0660) platform in Viosca Knoll 956 at 29.06085°N, -88.09148°W.		
City: New Orleans	County/Parish: New Orleans	State: Louisiana (GoA)



Photo File Name: R0010995

Orientation: N/A

Date of Photo: 05/20/2025

Time of Photo: 1:32 PM

Latitude: 29.0609

Longitude: -88.09155

Photographer: Kerri McCabe

Description: This photo shows the "NPDES Sample Point" from the flotation cell.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Ram Powell Facility (0660) platform in Viosca Knoll 956 at 29.06085°N, -88.09148°W.		
City: New Orleans	County/Parish: New Orleans	State: Louisiana (GoA)

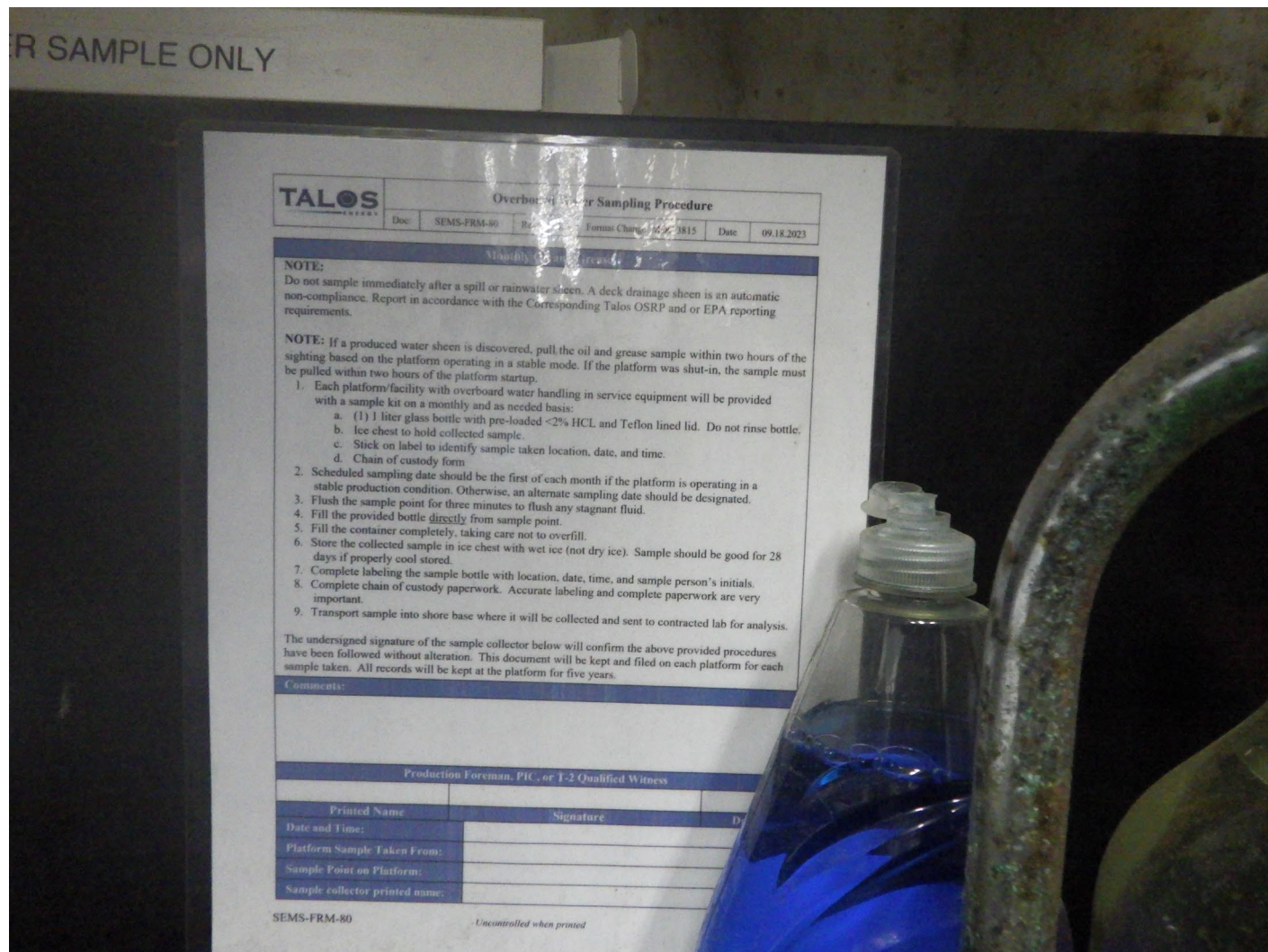


Photo File Name: R0010998

Orientation: N/A

Date of Photo: 05/20/2025

Time of Photo: 1:32 PM

Latitude: 29.0609

Longitude: -88.09155

Photographer: Kerri McCabe

Description: This photo shows the "Talos Overboard Water Sample Procedures" near the "NPDES Sample Point".



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Ram Powell Facility (0660) platform in Viosca Knoll 956 at 29.06085°N, -88.09148°W.		
City: New Orleans	County/Parish: New Orleans	State: Louisiana (GoA)



Photo File Name: R0010999

Orientation: N/A

Date of Photo: 05/20/2025

Time of Photo: 1:36 PM

Latitude: 29.0609

Longitude: -88.09155

Photographer: Kerri McCabe

Description: This photo shows the produced water sample near the "NPDES Sample Point".



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Ram Powell Facility (0660) platform in Viosca Knoll 956 at 29.06085°N, -88.09148°W.		
City: New Orleans	County/Parish: New Orleans	State: Louisiana (GoA)



Photo File Name: R0011000

Orientation: N/A

Date of Photo: 05/20/2025

Time of Photo: 1:42 PM

Latitude: 29.0609

Longitude: -88.09155

Photographer: Kerri McCabe

Description: This photo shows the designated fridge for "Overboard Water Samples".



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: Ram Powell Facility (0660) platform in Viosca Knoll 956 at 29.06085°N, -88.09148°W.		
City: New Orleans	County/Parish: New Orleans	State: Louisiana (GoA)

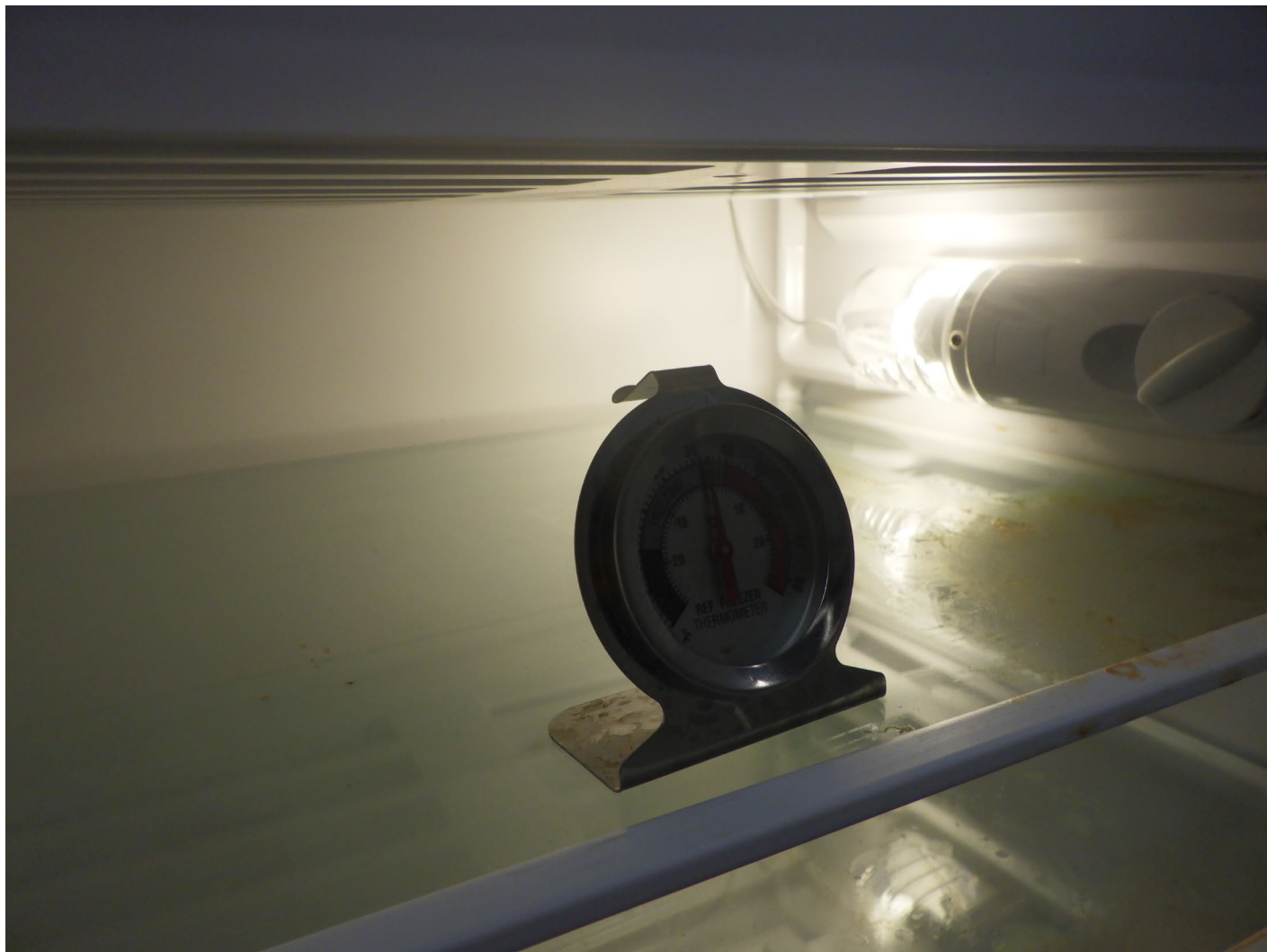


Photo File Name: R0011001

Orientation: N/A

Date of Photo: 05/20/2025

Time of Photo: 1:43 PM

Latitude: 29.0609

Longitude: -88.09155

Photographer: Kerri McCabe

Description: This photo shows the thermometer inside the "Overboard Water Samples" fridge.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: Ram Powell Facility (0660) platform in Viosca Knoll 956 at 29.06085°N, -88.09148°W.		
City: New Orleans	County/Parish: New Orleans	State: Louisiana (GoA)



Photo File Name: R0011002

Orientation: N/A

Date of Photo: 05/20/2025

Time of Photo: 1:43 PM

Latitude: 29.0609

Longitude: -88.09155

Photographer: Kerri McCabe

Description: This photo shows the TD-550/560 Oil in Water Analyzer used at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: Ram Powell Facility (0660) platform in Viosca Knoll 956 at 29.06085°N, -88.09148°W.		
City: New Orleans	County/Parish: New Orleans	State: Louisiana (GoA)



Photo File Name: R0011005

Orientation: 322° NW

Date of Photo: 05/20/2025

Time of Photo: 1:49 PM

Latitude: 29.06169

Longitude: -88.09199

Photographer: Kerri McCabe

Description: Looking NW, this photo shows the Enviro-Tech float cell at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: Ram Powell Facility (0660) platform in Viosca Knoll 956 at 29.06085°N, -88.09148°W.		
City: New Orleans	County/Parish: New Orleans	State: Louisiana (GoA)

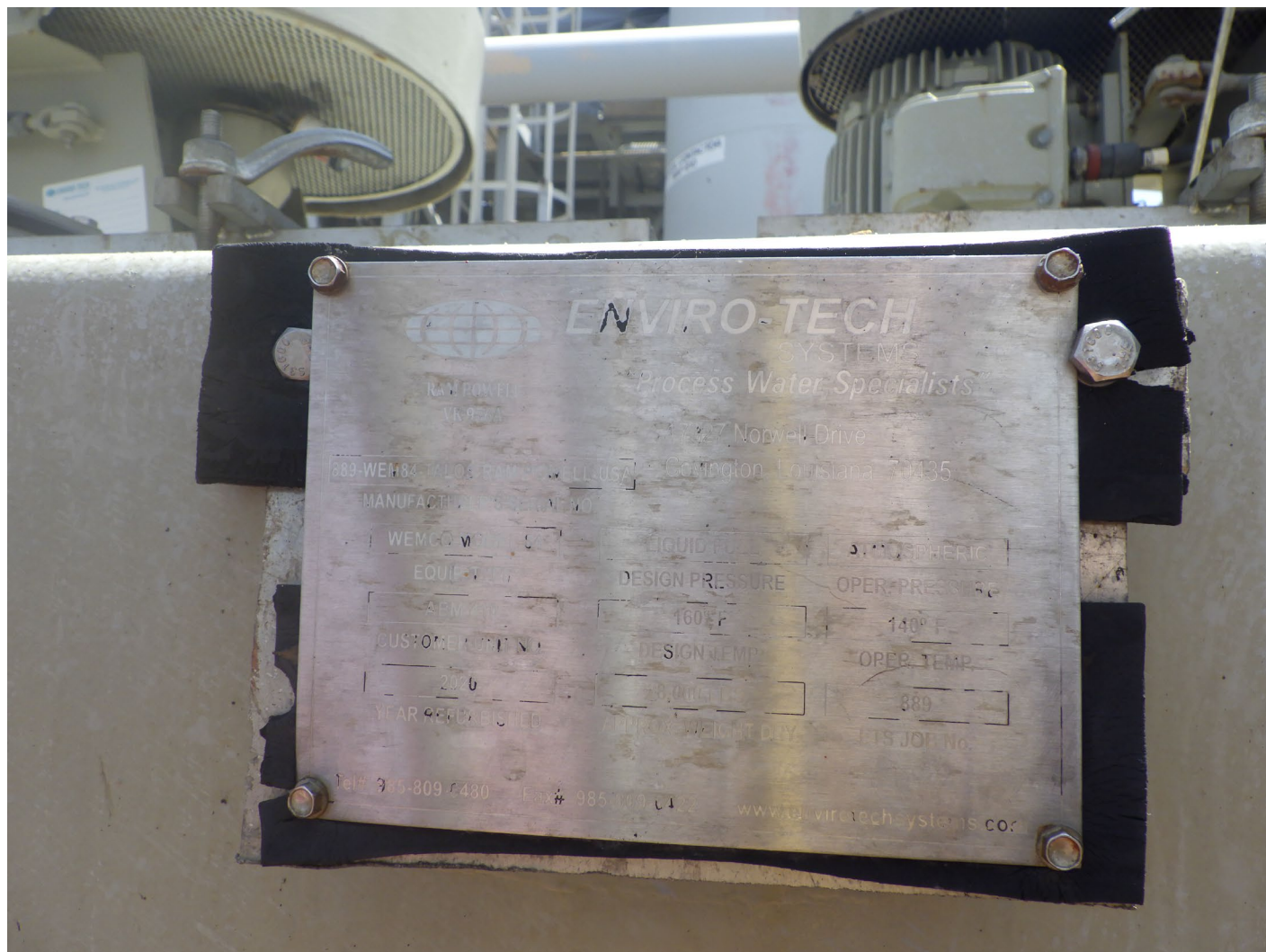


Photo File Name: R0011009

Orientation: 302° WNW

Date of Photo: 05/20/2025

Time of Photo: 1:52 PM

Latitude: 29.06157

Longitude: -88.09193

Photographer: Kerri McCabe

Description: Looking WNW, this photo shows the plates on the Enviro-Tech float cell.