

## NPDES PERMIT REQUIREMENTS IN GULF COAST EXPLORATION AND PRODUCTION AREAS

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### ABSTRACT

The federal government regulates discharges of pollutants into waters of the United State under the Clean Water Act (CWA) through issuance of permits under the National Pollutant Discharge Elimination System (NPDES). Anyone discharging pollutants directly into "waters of the United States" (almost any body of water, including lakes, rivers, streams, wetlands or offshore waters) from a point source (e.g., oil and gas exploration and production facilities) is a direct discharger. Direct dischargers must have an NPDES permit which specifically allows them to discharge designated pollutants. The permit will normally list the pollutants that the facility may discharge, and limit the discharge of each pollutant on a monthly, weekly or daily basis.

The EPA has recently developed NPDES requirements for facilities engaged in offshore oil and gas exploration and production. On September 30, 1992, Region 6 of the EPA issued a general NPDES permit for offshore operators within the Gulf of Mexico which authorizes discharges in accordance with specific effluent limitations, monitoring requirements, and other conditions of the permit. A general NPDES permit was also formalized by Region 6 EPA in 1991 for onshore oil and gas facilities. This "zero discharge" NPDES permit (prohibiting any discharge of pollutants into waters of the U.S.) is applicable to most onshore oil and gas facilities within Texas, Louisiana, New Mexico, and Oklahoma.

Failure to meet the requirements of a general or site-specific NPDES permit violates the law. The EPA and states with delegated permit authority can penalize violators through fines and imprisonment. Permitting authorities are becoming diligent in their enforcement efforts.