| | |
|---|---|
| **From:** | Galinsky, Virginia |
| **To:** | Roberts, Jennifer |
| **Subject:** | RE: Galinsky, Virginia shared the folder "BPH Post-FOV Conference Document Submittal" with you. |
| **Date:** | Monday, February 6, 2023 4:13:00 PM |
| **Attachments:** | image002.png<br>image003.png<br>image004.png<br>image005.png<br>image006.png |

---

Hi Jennifer,

Thanks for the email. Just one clarification on the NHVcz request. In addition to the previously identified dates, we discussed whether there may have been additional NHVcz violations which BPH had not previously identified. For example, if BPH determined that a supplemental gas flow meter was consistently reading low, then the automated control system may not have added enough supplemental gas, or it may have added too much steam, resulting in an NHVcz violation which wouldn't be identified until the correct amount of supplemental gas is used in the calculation of NHVcz. We requested that BPH investigate this possibility and identify to us whether any additional NHVcz violation occurred.

Thank you,

Virginia Galinsky
Environmental Engineer
Air Enforcement & Compliance Assurance Branch
U.S. EPA, Region 5
Phone: (312) 353-2089
Fax: (312) 697-2711
galinsky.virginia@epa.gov

---

**From:** Roberts, Jennifer <Jennifer.Roberts@bp.com>
**Sent:** Thursday, February 2, 2023 2:17 PM
**To:** Galinsky, Virginia <Galinsky.Virginia@epa.gov>
**Subject:** RE: Galinsky, Virginia shared the folder "BPH Post-FOV Conference Document Submittal" with you.

Virginia,

I am following up on our discussion during the FOV conference held on January 25. Earlier this week BP's in-house and outside counsel received an e-mail from attorney Grubb at Region 5 requesting an update with regard to the materials that EPA requested during the FOV conference. He provided the following list, and I have inserted comments under each item describing when the Refinery proposes to provide responses to EPA. We will upload the materials to the Sharefile link that you provided. In order to assist the Refinery is providing you with these materials we would like for Joan Anderson (Joan.Anderson@BP.com) and Ashley Zapp (Ashley.Zapp@BP.com) to be added to the Sharefile so that they are able to upload documents.

1. FOV Presentation

- I have attached slide presentation that the Refinery displayed during the FOV conference to this e-mail.

2. Documentation showing that that flow meters have met accuracy requirements
    - The Refinery is planning to provide this documentation for the flowmeters referenced in the FOV. The Refinery intends to provide this by the end of February.
3. Updated version of flare management plan
    - The Refinery intends to provide this by the end of February.
4. Two data sheets comparing flow meter values from the FCCU
    - We do not understand what the reference to “two data sheets” means, but during the FOV conference we agreed to provide data that compares flow rates from the old flowmeter to the flow rates from the new flowmeter for the limited period of time that both sets of data are available. The Refinery intends to provide this by the end of February.
5. Verification if six supplemental gas flow meters were reading higher or lower than 5%.
    - The Refinery is planning to provide documentation indicating whether the supplemental gas flowmeters were reading higher than 5%, lower than 5% or a combination of both. The Refinery intends to provide this by the end of February.
6. Timeline of internal assessment of MACT CC requirements
    - The Refinery intends to provide this by the end of February.
7. Dates of potential NHVcz violations
    - We would like clarification on this request. Our notes from the FOV conference reflect that EPA requested information about the deviations that the Refinery reported from the NHVcz limit in 2Q2020. The Refinery is planning to provide a copy of the relevant deviation report to EPA by the end of the February. If EPA is requesting something different we would appreciate clarification.
8. Results of investigation on what caused moisture in the samples
    - The Refinery intends to provide this by February 10, 2022.
9. Results of investigation into high benzene concentration at Monitor 6 and 12
    - The Refinery intends to provide this by February 7, 2022.

Please let me know if you have any questions.

Thank you,

**Jennifer Roberts**
**Environmental, Social & Carbon Superintendent** | **BP-Husky Toledo Refinery**
4001 Cedar Point Rd | Oregon, OH 43616 | : Cell (419) 688-1132

---

**From:** Galinsky, Virginia <Galinsky.Virginia@epa.gov>
**Sent:** Wednesday, January 25, 2023 12:33 PM
**To:** Roberts, Jennifer <jennifer.roberts@bp.com>
**Subject:** Galinsky, Virginia shared the folder "BPH Post-FOV Conference Document Submittal" with you.

# Galinsky, Virginia shared a folder with you

Please upload the requested documents here.

BPH Post-FOV Conference Document Submittal

This link only works for the direct recipients of this message.

Open

Microsoft

Privacy Statement