From: Loth, Cameron
To: Galinsky, Virginia
Cc: Apolinario, Valeria
Subject: RE: Questions on CD Semi-Annual Reports
Date: Tuesday, October 11, 2022 2:21:55 PM

Hi Virginia,

I copied the questions from your email and shaded my responses cyan. Please let me know if you would like any further information on any of these.

Thank you,

Cameron

1. Finding Number 3 in BP Husky's 2020 Consent Decree (CD) Audit – Corrective Action Plan (CAP) reported a late first attempt at repair for one control valve in the East Alstom Boiler Unit.
    a. On what date was the leak first detected? 10/11/2018
    b. How many days after the 5-day threshold was the repair attempted on the leak? First and final repair completed on 10/24/2018, so 13 days after initial leak detection, and 8 days after the 5 day repair date.
    c. Was a final repair attempt necessary, and if so, when did it occur? First and final repair completed on 10/24/2018
2. The Comparative Monitoring Finding in BP Husky's 2020 Consent Decree Audit- CAP reported a result above threshold values in the Unsat Gas Plant (valves & pumps) and the LPG Unit (valves).
    a. What is the historic leak percentage for the Unsat Gas Plant? Historic Valve Leak Rate (4 periods preceding the audit) = 0.11%; Historic Pump Leak Rate (12 periods) = 0.64%
    b. What is the historic leak percentage for the LPG Unit? Historic Valve Leak Rate (4 periods preceding the audit) = 0.30%
    c. What was the leak percentage for each the Unsat Gas Plant and the LPG Plant during the audit? Unsat Valves = 0.87% (1 leak out of 115 monitored); Unsat Pumps = 15.38% (2 leaks out of 13 monitored); LPG Valves = 1.6% (2 leaks out of 125 monitored)
3. On Page 7 of BP-Husky's 2020 CD Annual LDAR Compliance Status Report, BP-Husky reported that three valves at the LPG Unit were found untagged. Had these valves been in the LDAR database and timely monitored (i.e. were just missing the field tag) or had they not been in the LDAR database and had missed monitoring? These 3 valves were in the LDAR database and had received proper monitoring but were just missing the field tag when audited.
4. On Page 4 of BP-Husky's 2021 CD Annual LDAR Compliance Status Report, BP-Husky reported that one valve did not receive Repair Verification Monitoring by the end of the next day after a repair attempt. The repair was made Saturday 12/11/21 but was not checked by the end of 12/12/21. On what date did this valve receive Repair Verification Monitoring? The valve was monitored on Monday 12/13/21.

From: Galinsky, Virginia <Galinsky.Virginia@epa.gov>
Sent: Wednesday, October 5, 2022 9:32 AM
To: Loth, Cameron <Cameron.Loth@bp.com>
Cc: Apolinario, Valeria <Apolinario.Valeria@epa.gov>
Subject: RE: Questions on CD Semi-Annual Reports

Cameron, that timeline is fine. Thank you and best regards,

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

From: Loth, Cameron <Cameron.Loth@bp.com>
Sent: Wednesday, October 5, 2022 8:30 AM
To: Galinsky, Virginia <Galinsky.Virginia@epa.gov>
Cc: Apolinario, Valeria <Apolinario.Valeria@epa.gov>
Subject: RE: Questions on CD Semi-Annual Reports

Hi Virginia,
Thank you for your kind words; quite a sad time in the refinery as you can imagine. In regards to the information you requested, would end of day 10/11 work for you? I will hopefully have it here in a few days but just want to make sure I don't over promise.
Thanks again,
Cameron

From: Galinsky, Virginia <Galinsky.Virginia@epa.gov>
Sent: Tuesday, October 4, 2022 2:59 PM
To: Loth, Cameron <Cameron.Loth@bp.com>
Cc: Apolinario, Valeria <Apolinario.Valeria@epa.gov>
Subject: Questions on CD Semi-Annual Reports

Hi Cameron,

Our sincere condolences for the recent incident at the facility and the loss of two BP workers. We were deeply saddened to see the news reports.

We are reaching about because after reviewing the semi-annual CD reports submitted to date, we have compiled a few questions about what was reported. Please see below.

1. Finding Number 3 in BP Husky's 2020 Consent Decree (CD) Audit – Corrective Action Plan (CAP) reported a late first attempt at repair for one control valve in the East Alstom Boiler Unit.
    a. On what date was the leak first detected?
    b. How many days after the 5-day threshold was the repair attempted on the leak?
    c. Was a final repair attempt necessary, and if so, when did it occur?
2. The Comparative Monitoring Finding in BP Husky's 2020 Consent Decree Audit- CAP reported a result above threshold values in the Unsat Gas Plant (valves & pumps) and the LPG Unit (valves).
    a. What is the historic leak percentage for the Unsat Gas Plant?

b. What is the historic leak percentage for the LPG Unit?
c. What was the leak percentage for each the Unsat Gas Plant and the LPG Plant during the audit?

3. On Page 7 of BP-Husky's 2020 CD Annual LDAR Compliance Status Report, BP-Husky reported that three valves at the LPG Unit were found untagged. Had these valves been in the LDAR database and timely monitored (i.e. were just missing the field tag) or had they not been in the LDAR database and had missed monitoring?
4. On Page 4 of BP-Husky's 2021 CD Annual LDAR Compliance Status Report, BP-Husky reported that one valve did not receive Repair Verification Monitoring by the end of the next day after a repair attempt. The repair was made Saturday 12/11/21 but was not checked by the end of 12/12/21. On what date did this valve receive Repair Verification Monitoring?

Let me know if you need any clarification on any of the questions.

I'm sure that the recent incident is impacting your work, so we can be flexible with the timeline of your response to these items. Please let me know when you think would be a reasonable time to reply by.

Best regards,

Virginia Galinsky
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