Message

From: Buckbee, Rachel A [Rachel.Buckbee@bp.com]
Sent: 8/19/2019 6:44:41 PM
To: Pavitt, John [Pavitt.John@epa.gov]; Glover, Robin [Robin.Glover@bp.com]
CC: Williams, Christopher [Williams.Christopher@epa.gov]
Subject: RE: Records Request, EPA Air Compliance Inspection of BPXA GC#2

Hey John-
The files for the request are actually quite large, do you have an FTP site to exchange files through?
Or I can burn them to a CD and deliver to you today. Which do you prefer?
Rachel

Rachel Buckbee
Air Quality Compliance Advisor & Acting Environmental Team Lead
BP Exploration Alaska / Desk: +1 907 564 4405 / Cell: +1 907 331 9034

From: Pavitt, John <Pavitt.John@epa.gov>
Sent: Thursday, August 15, 2019 10:23 AM
To: Buckbee, Rachel A <Rachel.Buckbee@bp.com>; Glover, Robin <Robin.Glover@bp.com>
Cc: Williams, Christopher <Williams.Christopher@epa.gov>
Subject: RE: Records Request, EPA Air Compliance Inspection of BPXA GC#2

Hello Rachael. Monday would be fine. Thanks for letting me know.

Let me know if you have any questions.

Sincerely,

John Pavitt, Air Compliance Inspector
Air and Toxics Enforcement Section
U.S. EPA Region 10
Alaska Operations Office
Anchorage, AK
Phone: (907) 271-3688

From: Buckbee, Rachel A <Rachel.Buckbee@bp.com>
Sent: Thursday, August 15, 2019 10:14 AM
To: Pavitt, John <Pavitt.John@epa.gov>; Glover, Robin <Robin.Glover@bp.com>
Cc: Williams, Christopher <Williams.Christopher@epa.gov>
Subject: RE: Records Request, EPA Air Compliance Inspection of BPXA GC#2

Hey John-
Would it be possible to have an extension to COB Monday?

I have been doing two jobs filling in as Team Lead, and I honestly, forgot about the request! The info should be easy enough for the OGI team to pull, but if we could have the weekend, that would be great. Again, apologies!

Rachel

Rachel Buckbee

Air Quality Compliance Advisor & Acting Environmental Team Lead
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From: Pavitt, John <Pavitt.John@epa.gov>
Sent: Friday, August 2, 2019 11:12 AM
To: Buckbee, Rachel A <Rachel.Buckbee@bp.com>; Glover, Robin <Robin.Glover@bp.com>
Cc: Williams, Christopher <Williams.Christopher@epa.gov>
Subject: Records Request, EPA Air Compliance Inspection of BPXA GC#2

Hello Robin. I'm sending this email to request records as part of the joint EPA/State of Alaska air compliance inspection on July 16, 2019 of the GC#2 facility. The inspection focused on compliance with New Source Performance Standards (NSPS), Subpart OOOOa. During the inspection we visited N-Pad and W-Pad.

Thank you for already emailing me 2 records we discussed during our time on site: BPXA's Severity Ranking system flow chart, and a copy of a State permit modification request letter (for disaggregation). You also gave me a copy of your Fugitive Emissions Monitoring Plan while I was on site.

Records Request:

1. Please send me records of leak inspections at N-Pad and W-Pad (only):
    a. For new leaks identified during the inspection, confirm that the leaking components have been added to your tracking system and are on a schedule for repair.
    b. For leaks placed on Delay of Repair in the *Annual Compliance Report* (October, 2018): Please provide records for leaks identified after 8/2/17:
        i. Daily inspection logs such as paper checklists used by your leak inspectors when the leaks were identified
        ii. Photos of leaking components, showing GPS coordinates
        iii. Photos of tags put onto leaking components
        iv. The Severity Ranking for each leak
        v. Work orders related to repairing leaks
        vi. Follow up inspection records for all leaking components which have been repaired or replaced, and then resurveyed to verify they were no longer leaking.

I would appreiciate receiving these records by Friday, August 16. Please let me know if you have any questions about this request.

Thank you again for your help during the on-site inspectin and for the records already provided.

Sincerely,

John Pavitt, Air Compliance Inspector
Air and Toxics Enforcement Section
U.S. EPA Region 10
Alaska Operations Office
Anchorage, AK
Phone: (907) 271-3688