Message

From: Pavitt, John [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31D144BE2F8043A2B6DE245E1706134A-PAVITT, JOHN]
Sent: 8/2/2019 7:12:21 PM
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
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