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bp

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JUN 21 2010
Air/Toxics & Inspecti
Coordination Branc
EPA

June 17, 2010

CERTIFIED MAIL# 7003 1010 0003 8922 7678
RETURN RECEIPT REQUESTED

Mr. Steve Thompson
Compliance Assurance and Enforcement Division (6EN-AA)
Environmental Protection Agency, Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

RE: Request for Information pursuant to the Clean Air Act
BP Texas City Refinery, Texas City, Texas
Texas City, Galveston County
CN 600866800
RN 102535077

Mr. Thompson:

BP Products North America Inc. (BP) is in receipt of a letter from Mr. John Blevins dated May 13, 2010 regarding, a request for information pursuant to the Clean Air Act. In the letter, EPA requested that we provide:

1. A copy of all currently or previously applicable Federal Operating Permits. For each permit or authorization submitted, BP has also included the official correspondence indicating the current status of the permit as of the date of receipt of this request. Documents are located in the following location:

Folder	Source	File name
Question 1	Refinery	O1541 Permit - Initial Issuance TCR 12-07-04 .pdf O1541Permit - Significant Revision 07-06-06.pdf O1541 Permit - Significant Revision 09-19-07.pdf
Question 1	Refinery Docks	O-2328 Initial Issuance 01-31-05.pdf O-2328 Minor Revision 02-23-09.pdf

2. A copy of the most recent version of each currently or previously applicable permit for new construction or modification. For permits amended, modified, replaced, or renewed through the provisions of 30 TAC Chapter 116, Subchapter G, BP has also provided a copy of the permit for new construction or modification in effect immediately prior to such amendment, modification, replacement, or renewal. For each permit or authorization submitted, BP has also included the official correspondence indicating the

current status of the permit as of the date of receipt of this request. Documents are located in folder named **Question 2**. Summary table is labeled ***BP Texas City Refinery Permit History.xls*** and all associated permits are identified by permit number.

3. A copy of all currently or previously applicable Permits by Rule and identified associated emissions units that they regulate. As part of this request, BP has also identified which Permits by Rule modified emissions limits in individual NSR permits. For each permit or authorization submitted, BP has also included the official correspondence indicating the current status of the permit as of the date of receipt of this Request. Documents are located in folder named **Question 3**. Summary table is labeled ***BP TCR Current PBR Status.xls*** and all associated permits by rules are identified by folders labeled with the permit number.

4. A table listing all "grandfathered" emissions units that were initially permitted under 30 TAC Chapter 116, subchapters G or H. The Table is located in the folder named Question 4.Table and labeled ***BP Products North American Inc. Grandfathered Facility Summary.xls***.

5. Copies of the Title V Annual Compliance Certifications for 2007-2009. BP has also included a narrative of our internal processes for determining compliance with all applicable requirements. Documents are located in the following location:

Folder	Source	File name
Question 5	Refinery	O-01541 Annual Compliance Certification - 10.1.2006 to 9.30.2007.pdf O-01541 Annual Compliance Certification - 10.1.2007 to 9.30.2008.pdf O-01541 Annual Compliance Certification - 10.1.2008 to 9.30.2009.pdf
Question 5	Refinery Docks	O-02328 Annual Compliance Certification 2007.pdf O-02328 Annual Compliance Certification 2008.pdf O-02328 Annual Compliance Certification 2009.pdf

Please contact Carrie Phillips of my staff at 409-941-8041 or Carrie.Phillips@bp.com if you have further questions or comments.

Sincerely,

Paula LaRocca
Air Team Leader

CLP/dr
Attachment