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MAY 18 2012

Air/Toxics & Inspection
Coordination Branch
6EN-A

May 17, 2012

FedEx Express# 8598 1978 2481

Mr. David Eppler, 6EN-AT
U.S. Environmental Protection Agency
1445 Ross Avenue
Dallas, Texas 75202

RE: Clean Air Act Section 114 Information Request
BP Products North America Inc., Texas City, Texas

Dear Mr. Eppler:

This submittal is in response to a Clean Air Act Section 114 information request sent to BP Products North America, Inc., Texas City, Texas, dated March 29, 2012 and received April 4, 2012.

BP Products North America Inc. (BP) has thoroughly reviewed its files in response to the request and believes it has provided all non-privileged information available in its files. Nonetheless, if we locate additional information responsive to the request, we will supplement our response.

If there are any questions or comments regarding this correspondence please contact Treena Piznar at (409) 945-1152 or Treena.Piznar@bp.com.

Sincerely,

Keith Casey
Business Unit Leader

VS/dr

Question 1: Please identify, via spreadsheet or other electronic format, a list of all asbestos abatement work (covered by the asbestos NESHAP) performed at the BP Texas City facility from October 2009 through October 2011. Please provide a description of the work performed, the dates it was performed, who performed the work and the amount of and type of asbestos abated.

Answer #1: The information requested in question #1 is provided as an Excel spreadsheet on the Compact Disk labeled "BP Products North America's Response to EPA's March 29, 2012 Clean Air Act Section 114 Request" ("Response CD") in the folder labeled as BP 114 Answer 1. The information was gathered by Larry Mueller, the facility's Asbestos Compliance Manager, from the BP Texas City Refinery Asbestos Compliance Information Management System ("ACIMS") database. The ACIMS database is maintained by BP's contractor CAM Environmental and updated by CAM as asbestos activities occur.

Question #2: For all renovation and asbestos work at the BP Texas City facility involving the Pipestill 3A Unit, 101-FA Drum (Crude Desalter 101-FA) and the Pipestill 3A Unit, 101-FB Drum (Crude Desalter 101-FB), please provide any documents, including, but not limited to, all contract documents, specifications, site plans, site logs, or other documents, related to the asbestos abatement work, and all documents involving the relationship between BP, Miken, CAM Environmental, or Mobley, that relate to the asbestos work performed on these two units.

Answer #2: Documents responsive to Question 2 are produced electronically on a separate Compact Disk labeled as "Documents Provided in Conjunction with BP Product North America's Response to EPA's March 19, 2012 Clean Air Act Section 114 Request Question 2."

Question #3: Provide a detailed timeline of all events related to any asbestos work performed on all the units identified in the preceding question, including, but not limited to, the dates of all clearance sampling events by CAM, dates of all notifications to EPA or TDSHS, visits to abatement work area by BP personnel, significant work events, such as barriers erected, abatement begins, abatement completed, final clearances run, barriers removed, blasting work started, debris discovered, debris removed, bulk samples taken, or any other function performed by BP, Miken, CAM, or Mobley in relation to these units.

Answer #3: The information requested in Question #3 is included on the Response CD provided in the folder labeled as BP 114 Answer 3.

Question #4: For all work described in question 2 above, please provide a list of all CAM personnel, whether CAM employees or contractors, involved in managing, oversight, inspection, and/or supervising of the projects, including, but not limited to, the dates and times each person visited the site and the activities conducted during the visit.

Answer #4: A spreadsheet containing a list of CAM personnel involved in managing, oversight, inspection, and/or supervising the project in question 4 is located on the Response CD provided in the folder labeled BP 114 Answer 4.

Question #5: Please provide a detailed description of CAM's role in overseeing or managing the project.

Answer #5: A detailed description of the roles for CAM Environmental employees in overseeing and managing asbestos work activities is located on the Response CD provided in the folder labeled as BP 114 Answer 5.

Question #6: For all work described in question 2 above please describe how the asbestos contaminated waste and waste water was collected and disposed of during the asbestos abatement activities.

Answer #6: Waste water (amended water) and asbestos containing materials (ACM) was collected during the work activities in the Pipestill 3A Unit on the 101-FA and 101-FB vessels. Amended water was used to wet the ACM, doubled bagged and contained in the ACM that was abated. Part of the final clearance included wet wiping of all surfaces within the Negative Pressure Enclosure and surrounding area. Towels and rags used during this final cleaning were also doubled bagged and disposed of as ACM. The bags were placed in the appropriate disposal container and disposed of in an approved landfill permitted to accept ACM.

An Excel spreadsheet with the details of waste generated during the cleaning and abatement activities that occurred on the 101-FA and 101-FB is located on the Response CD provided in the folder labeled BP 114 Answer 6.

Question #7: For all work described in question 2 above, who were the individuals responsible for conducting inspections of the work areas to determine completeness, thoroughness, and cleanliness of the work during the abatement activities, including the final determination that work was completed satisfactorily.

Answer #7: A spreadsheet reflecting the individuals responsible for conducting inspections of the work areas to determine completeness, thoroughness, and cleanliness of the work during the abatement activities, including the final determination that work was completed satisfactorily is on the Response CD provided in the folder labeled as BP 114 Answer 7.

Question #8: In narrative form, provide a detailed description of the events surrounding the abatement activities described in question 2 above, including, but not limited to Mobley starting work, discovering suspected asbestos debris, and informing BP of the asbestos debris on and around the Desalter tanks.

Answer #8: The narrative requested above is on the Response CD provided in the folder labeled as BP 114 Answer 8.

Question #9: For all work described in question 2 above, list the names, employer and responsibilities, as well as training documentation, for all individuals responsible for, in any way, overseeing, monitoring, or implementing the work at the site throughout all phases of the project.

Answer #9: A spreadsheet listing the names, employers, and responsibilities for all individuals responsible for, in any way, overseeing, monitoring, or implementing the work at the site throughout all phases of the project is on the Response CD provided in the folder labeled as BP 114 Response Answer 9. This folder also includes all training documentation for each individual identified in the spreadsheet.

Question #10: Provide details on exactly how much and what type of asbestos was estimated to be on the units described in question 2 during the pre-renovation inspection, how much asbestos was actually removed in each phase of the abatement process, and how much asbestos was left behind following the completion of abatement activities.

Answer #10: Details on how much and what type of asbestos was estimated to be on the units described in question 2 during the pre-renovation inspection, how much asbestos was removed in each phase of the abatement process and how much asbestos was left behind following the completion of abatement activities are on the Response CD provided in the folder labeled BP 114 Answer 10.

As noted on the asbestos notification forms submitted to the Texas Department of State Health Services, 3,300 feet of Regulated Asbestos Containing Material ("RACM") insulation was estimated during the pre-renovation inspection to be present on the 101-FA drum and 3,300 feet of RACM insulation was estimated to be present on the 101-FB drum. All but 5 square feet were removed from the 101-FA drum during the abatement work performed in November of 2009. All but 1 square foot was removed from the 101-FB drum during the abatement work performed in November and December of 2009.

When the contractor Mobley was setting up to begin maintenance work on the 101-FA drum, its personnel identified golf-ball-sized pieces of potential ACM on the drum and potential ACM debris in the containment area around the 101-FA. Before the clean-up work was performed, it was estimated that five feet of ACM would be cleaned up. All but 1 foot of ACM was removed in January of 2010.

Before the clean-up work performed on the 101-FA drum in February and March of 2010, one square foot of insulation was estimated to be on the 101-FA drum. That one square foot along with residual abrasive blasting media was removed from the 101-FA drum and the containment area surrounding it in February and March of 2010. No ACM remained on the 101-FA drum at the end of this clean-up work.

Before the clean-up work performed on the 101-FB drum in February and March of 2010, one square foot of insulation was estimated to be on the 101-FB drum. That one square foot was removed from the 101-FB drum in February and March of 2010. No ACM remained on the 101-FB drum at the end of this clean-up work.

Question #11: Please describe the number of asbestos-containing waste bags that were generated after the first clearance sampling events, including the estimated number of cubic feet or estimated weight of the material.

Answer #11: A spreadsheet with the data regarding the number of asbestos-containing waste bags that were generated after the first clearance sampling events, including the estimated number of cubic feet or estimated waste, is on the Response CD provided in the folder labeled BP 114 Answer 11. The ACM bags that were generated after the first air clearance sampling performed on the 101-FA and 101-FB vessels totaled 1,734 bags. This included the 5 square feet of material collected following the cleanup Miken performed on January 14, 2010 prior to Mobley beginning its maintenance activities on the 101-FA. It also included the one square foot of material removed from the 101-FB. Additionally, there were 3 bags of disposal suits.

During the February 2010 cleanup activities of the 101-FA vessel there was a total of 1,731 bags of ACM, of which, 1,651 bags contained abrasive blasting grit and 80 bags of polyethylene and disposal PPE suits from the Miken asbestos abatement workers.

BP Response to Question 5

For the work performed between November 11, 2009 and March 2, 2010 on the Pipestill 3A Crude Desalter 101-FA and 101-FB drums, CAM Environmental personnel performed the roles of Project Manager Superintendant, General Foreman, Asbestos Consultant, Air Monitoring Technician, Building Inspector/Survey Technician, and Project Competent person. Detailed descriptions of these roles appear below.

Project Manager Superintendent

Responsibilities:

The site Project Manager Superintendent was responsible for the overall management of all CAM personnel working at BP. This person was the key point of contact for all client interaction and communication and is responsible for building and maintaining client relationships. The superintendent was responsible for the allocation of CAM resources as well as the overall coordination of project assignments, personnel, equipment, and schedules. The superintendent assured that overall client efficiency, quality, and safety goals were met. The site superintendent provided work direction, leadership, and training to on-site personnel. Responsibilities included:

- Compliance with all client and site-specific policies, programs, and procedures;
- Project scheduling, monitoring, and review;
- Management of staff training, licensing, and accreditations;
- Stewardship of on-site CAM equipment;
- Contract compliance and administration;
- Hiring, firing, and review of on-site personnel; and
- Compliance with all CAM administrative and field procedures.

General Foreman

Responsibilities:

The General Foreman was responsible for the overall field implementation and field oversight of all projects at the site, many of which had the potential to be occurring simultaneously. This included directing and coordinating field personnel and materials in order to achieve stated time, budget, and performance objectives for each individual project. Responsibilities included the administration, management, and communication of project schedules, budgets, specifications, and performance benchmarks. Responsibilities included:

- Defining and/or confirming project goals, objectives, budgets, and benchmarks;
- Identifying major project phases and activities;
- Optimization of personnel and equipment through project allocation;
- Direction of overall field activities for on-site personnel;

- Overseeing and managing execution of project schedules; and
- Oversight of all field safety.

Asbestos Consultant

Responsibilities:

The Asbestos Consultant was responsible for providing technical guidance to all CAM personnel working on asbestos projects. This person was additionally available on an as needed basis for client interaction and communication associated with regulatory compliance and technical quality. During this project, an additional responsibility was implemented that included writing Asbestos Work Plans for projects that were greater than one (1) Asbestos Reporting Unit (ARU) in size and Generic Work Plans for projects less than 1 ARU. The work plans included engineering controls, air monitoring activities and final clearance criteria. All work plans conformed to applicable OSHA and EPA Regulations. Responsibilities included:

- Providing guidance in the determination of sample type, number, and location;
- Providing written asbestos work plans for asbestos abatement projects, as requested;
- Conducting site evaluations, as requested;
- Reviewing paperwork for QA/QC;
- Interpretation and calculation of monitoring results, as requested; and
- Participation in meetings, either on-site or via teleconference.

Air Monitoring Technician

Responsibilities:

The Air Monitoring Technician (AMT), was responsible for collecting asbestos air samples prior to, during, and after abatement activities. They were also responsible for performing pre-abatement inspections, glovebag inspections, daily containment inspections, taking detailed daily job notes, pump calibration, maintaining equipment, job site assessments, detailed diagram of job site, etc. Insuring all air monitoring jobs were preformed with accuracy, integrity and efficiency. Responsibilities included:

- Worksite evaluations;
- Coordination of monitoring activities with contractor work schedules;
- Performance of area and personnel air monitoring during abatement activities;
- Clearance sampling; and
- Thorough documentation of all monitoring activities.

Building Inspector/Survey Technician

Responsibilities:

The Building Inspector (BI) / Survey Technician was responsible for collecting asbestos bulk samples prior to asbestos abatement, renovation or demolition activities. They were also responsible for assigning Homogeneous Area Numbers to asbestos containing material. The BI / Survey Technician was responsible for performing visual inspections of all known existing asbestos containing material. Responsibilities included:

- Collection of bulk samples of all suspect asbestos material;
- Quantification of all homogeneous areas;
- Conduct visual condition assessments of asbestos material; and
- Documentation of all bulk sampling activities.

Project Competent Person

Responsibilities:

The Project Competent Person, was responsible for the oversight of asbestos related activities and assisting the client and other contractors in ensuring compliance associated with these tasks. They also performed final post abatement final visual inspections, tracking and distribution of work orders and analytical reports, as well as organization and filing of all records, field notes, and project documentation. Responsibilities included:

- Abatement oversight;
- Performance of visual inspections prior to abatement activities;
- Insuring that abatement workers have necessary training (refreshers, fit test, PWS, etc.);
- Providing active participation during the execution and final clearance of all asbestos projects;
- Performing visual inspection at the completion of asbestos abatement projects prior to clearance sampling;
- Conducting worksite evaluations ;
- Performing baseline sampling prior to abatement activities;
- Coordinating monitoring activities with contractor work schedules;
- Performing area and personnel air monitoring during abatement activities;
- Conducting clearance sampling; and
- Documentation of all monitoring activities.