UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

MAY 13 2010

CERTIFIED MAIL - RETURN RECEIPT REQUESTED: 7007 1490 0004 0588 8652

C. C. Rice
Environmental Compliance Contact
Texas City Facility
2401 Fifth Avenue South
Texas City, TX 77592

Re: Request for Information pursuant to the Clean Air Act
Texas City Facility, Texas City, Texas

Dear C. C. Rice:

Enclosed is an Information Request (Request) issued under the authority of Section 114 of the Clean Air Act (CAA) to BP Products North America Inc. for its facility, located in Texas City, Texas and assigned the regulated entity number: RN102535077. This Request is intended to obtain the necessary information to determine compliance with the CAA.

Please mail your response, within thirty (30) days of your receipt of this letter, to Mr. Steve Thompson at the enclosed address.

Please contact Mr. Thompson, of my staff, at (214) 665-2769 if you have any questions relating to this Request.

Sincerely,

John Blevins
Director
Compliance Assurance and
Enforcement Division

Enclosure

cc (electronically): John Sadlier, Director
Office of Compliance and Enforcement
Texas Commission on Environmental Quality

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INFORMATION REQUEST

The U.S. Environmental Protection Agency (EPA) Region 6 is issuing this Information Request (Request) under Section 114(a) of the Clean Air Act ("Act" or "CAA"), 42 U.S.C. § 7414(a). Section 114(a) of the Act authorizes the Administrator of the EPA to require the submission of information. This authority has been delegated to the Director of the Compliance Assurance and Enforcement Division, EPA, Region 6.

The information requested must be submitted whether or not you regard part or all of it a trade secret or confidential business information. You may, if you desire, assert a business confidentiality claim on all or part of the information submitted. Any information subsequently determined to constitute a trade secret will be protected under 18 U.S.C. § 1905. Unless you make a claim at the time that you submit the information, it may be made available to the public by EPA without further notice to you. You should read 40 C.F.R. Part 2 carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of a claim. Emission data is exempt from claims of confidentiality under Section 114 of the Act, and the emission data that you provide may be made available to the public. Information subject to a business confidentiality claim is available to the public only to the extent allowed under 40 C.F.R. Part 2, Subpart B. Failure to assert a business confidentiality claim makes all submitted information available to the public without further notice.

All requested information must be submitted under an authorized signature with the following certification:

> I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines and/or imprisonment pursuant to Section 113(c)(2) of the Act, and 18 U.S.C. § 1001 and 1341.

We may use any information submitted in response to this Request in an administrative, civil, or criminal action.

This Request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation. Failure to comply fully with this Request may subject **BP Products North America Inc.** to an enforcement action under Section 113 of the Act, 42 U.S.C. § 7413.

Any information or correspondence submitted by **BP Products North America Inc.** to EPA, Region 6 in response to this Request shall be addressed to the following:

John Blevins, Director
Compliance Assurance and Enforcement Division
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733
ATTN: Steve Thompson (6EN-AA)

I. DEFINITIONS

1. The term "you" or "your" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors, assignees, and agents.

2. The term "Permitting Authority" or "Commission" shall mean the Texas Commission on Environmental Quality (TCEQ) or its predecessors.

3. The term "Federal Operating Permit" shall mean any permit or authorization issued by the Permitting Authority under 30 TAC Chapter 122.

4. The term "Permits by Rule" shall mean any permit or authorization issued by the Permitting Authority under 30 TAC Chapter 106.

5. The term "Permits for New Construction or Modification" shall mean any permit or authorization issued by the Permitting Authority under 30 TAC Chapter 116.

6. The term "official correspondence" shall mean any written communication to you, printed on Commission letterhead and signed by a representative of the Commission, through which the Commission took action on your permit or authorization.

7. "Grandfathered" shall refer to any emissions source which did not have an applicable permit prior to the issuance of a permit under 30 TAC Chapter 116, Subchapter G or H.

8. All remaining terms used in this Request will have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. § 7401 et seq., the implementing regulations.

9. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate, in the context of a particular question or questions.

II. INSTRUCTIONS

1. If information or documents not known or not available to you as of the date of submission of a response to this Request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find, at any time after the submission of your response, that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response. There are significant penalties for submitting false information, including the possibility of fine or imprisonment.

2. If information responsive to one of the below requests was previously provided to EPA in response to a prior Information Request, EPA does not require that such information be submitted again. In lieu of resubmitting such information, for each such request below, please indicate the date that such information was provided to EPA and to whom it was provided. However, to the extent that this Request requires submission of information that post-dates the information provided in response to the prior Request, EPA requires that additional information be provided or updated.

3. For each document produced in response to this Request, submit all information, logically identified (e.g., Permit 12345.pdf), in electronic format on compact disc or other electronic storage media.

4. Please provide a separate response to each question in an appropriately named electronic folder.

5. Please submit the requested information regarding your facility within thirty (30) days of receipt of this letter.

III. QUESTIONS

1. Please provide a copy of all currently or previously applicable Federal Operating Permits. For each permit or authorization submitted in response to this question, please include official correspondence indicating the current status of the permit as of the date of receipt of this Request (e.g., a notice of renewal, voidance, issuance, etc.).

2. Please provide a copy of the most recent version of each currently or previously applicable Permit for New Construction or Modification. For those permits amended, modified, replaced, or renewed through the provisions of 30 TAC Chapter 116, Subchapter G, please provide a copy of the Permit for New Construction or Modification in effect immediately prior to such amendment, modification, replacement or renewal. For each permit submitted in response to this question, please include official correspondence indicating the current status

of the permit as of the date of receipt of this Request (e.g., a notice of renewal, voidance, issuance, etc.).

3. Please provide a copy of all currently or previously applicable Permits by Rule and identify the associated emission units that they regulate. Identify any Permits by Rule that modify emission limits in individual NSR permits. For each submitted permit, please include official correspondence indicating the current status of the permit as of the date of receipt of this Request (e.g., a notice of renewal, voidance, issuance, etc.).

4. Using the following format, please provide a table listing all "grandfathered" emissions units that were initially permitted under 30 TAC Ch. 116, subchapters G or H.

Emission Unit ID (EPN)	Source Description	Actual Emissions (TPY) prior to permits issued under 30 TAC Ch. 116, subch. G or H	Controls required by any permits issued under 30 TAC Ch. 116, subch. G or H	Actual Emissions (TPY) after implementation of controls required by any permits issued under 30 TAC Ch. 116, subch. G or H	Applicable permit ID(s)

5. Please provide copies of your Title V Annual Compliance Certifications for 2007-2009. In addition, please provide a narrative of your internal processes for determining compliance with all applicable requirements.