

US EPA ARCHIVE DOCUMENT



Michael J. Utsler

Chief Operating Officer
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BP America Inc.
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August 19, 2010

Paul F. Zukunft
Rear Admiral, USCG
Federal On-Scene Coordinator
United States Coast Guard
1250 Poydras Street
New Orleans LA 70113

Dear Admiral Zukunft:

Attached are the final versions of the four plans which make up the Recovered Oil, Contaminated Materials and Liquid Solid Wastes Management Directives (Directives) – Waste Sampling, Community Outreach, Waste and Material Tracking and Reporting and Liquid Waste and Material Management. BP submitted follow up responses on August 6, 2010 to address specific comments received by BP from the EPA and Alabama Department of Environmental Management (ADEM). Some of the responses have been addressed through updates to the actual plans. Other responses have been addressed directly. BP began posting daily the stored volume of material from the barges and other vessels to the bp.com website on August 13, 2010. Likewise, BP began to archive the daily consolidated waste and material report as of August 6, 2010. BP is in the process of attempting to obtain letters of acceptance from each of the pretreatment and POTW facilities it intends to use. BP will also attempt to obtain a letter from the appropriate state environmental agency stating that the proposed facilities are capable of handling the additional flows without violating permits.

Pursuant to the terms of the Directives, BP continues to implement and follow the Recovered Oil/ Waste Management Plans for Houma Incident Command, approved on June 14, 2010, and the Deepwater Horizon (MC-252) Incident Final Solid Waste Management Plan, Mobile Sector, approved on June 24, 2010 (collectively referred to as the "Waste Management Plans"). In addition, also pursuant to the terms of the Directives, BP submitted on July 6, 2010, the Deliverables required by the Directives for the identification, characterization, handling, management, and disposal of oil, contaminated material, and liquid wastes recovered in cleanup operations resulting from the discharge of oil from the MC-252 incident, with follow up submittal on July 23, 2010. Until the

Deliverables are approved by the Unified Command, BP will continue to conduct work under the existing Waste Management Plans, which have been developed and approved by the Incident Commands in Houma and Mobile according to and under the National Contingency Plan and the Oil Pollution Act of 1990.

BP has begun the process, from the Unified Area Command to consolidate Waste Management Plans from Houma and Mobile in a single Gulf Wide Waste Management Plan. The Gulf Wide Waste Management Plan will be fully implemented when it is approved by the Unified Command. BP will merge the four plans from the Directive with the existing Houma and Mobile waste management plans.

Sincerely,

A handwritten signature in black ink that reads "Michael J. Utsler". The signature is written in a cursive, flowing style.

Michael J. Utsler