

US EPA ARCHIVE DOCUMENT

**U.S. Department of
Homeland Security**

**United States
Coast Guard**



Federal On-Scene Commander
Unified Area Command

Unified Area Command
1250 Poydras Street
New Orleans, LA 70130

5891
July 24, 2010

Mr. Doug Suttles
Chief Operating Officer
Exploration & Production
BP America Inc.
501 WestLake Park Boulevard
Houston, Texas 77079

Re: Waste Management Directive and Deliverables

Dear Mr. Suttles:

On 16 July 2010, I directed you to revise the deliverables that BP submitted pursuant to the Recovered Oil, Contaminated Materials, and Liquid and Solid Wastes Management Directive dated June 29, 2010. On July 23, 2010, BP submitted revised materials in response to comments and recommendations provided by the Federal agencies who are part of the Unified Area Command. The letter dated July 1, 2010 from Mr. Mathy Stanislaus, Assistant Administrator, EPA Office of Solid Waste and Emergency Response, to Mr. Ronald Hulsey, BP Exploration & Production, concerning BP's website content to be included as part of the Appendix A, Community Outreach Plan of the June 29, 2010 Management Directive is one of those comments and recommendations.

There remains a serious concern that waste management information is not being posted in a timely fashion on the www.bp.com website to provide the public with an accurate picture of how waste is being handled. Although the MC 252 Waste and Oil Recovery and Disposal Cumulative totals have been updated through the period ending July 19, 2010, the most recent sample posted in the Sample Analysis is dated June 6, 2010. Although the possible staging areas are identified in the plans, there is no mapping of the staging areas. Additionally, there are no BP or state hotline phone numbers to provide the public with an opportunity to voice any concerns or complaints regarding waste management, nor is there a community outreach section with the ability to submit concerns/complaints on-line, or a tracking/reporting system on resolutions. Finally, there is no summary of the approved waste plans.

It is critical that the public and regulatory agencies have up-to-date and relevant information as it relates to liquid and solid waste handling procedures, waste characterization and recycling efforts. The information should be represented by staging area and participating landfill in the BP/WM contractual relationship. It would also prove beneficial to demonstrate cleanup effort and productivity in affected shoreline areas.

I am again directing you to comply with the website requirements identified in EPA's July 1, 2010 letter. Please consider this letter as formal notice that you must revise your website no later than July 28, 2010.

Should you need an extension of time in which to revise the website and submit it to me, please make an appropriate request to me prior to July 28, 2010. Additionally, if you have any concerns about your ability to satisfy any of the website comments or recommendations, please contact me.

Sincerely,



PAUL F. ZUKUNFT
Rear Admiral, U.S. Coast Guard
Federal On-Scene Coordinator