

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION IX  
 75 Hawthorne Street  
 San Francisco, CA 94105

CERTIFIED MAIL 7008 1140 0004 5420 5544  
 RETURN RECEIPT REQUESTED

March 19, 2009

In Reply Refer To: CWA-309(a)-09-011

Taulapapa William Sword, Terminal Engineer  
 British Petroleum South-West Pacific  
 P.O. Box PPB  
 Pago Pago, Tutuila, American Samoa 96799

Dear Mr. Sword:

This Administrative Order establishes a self-monitoring program for the American Samoa Terminal both to ensure representative sampling of all wastewater discharges to the harbor and to establish a usable sample record for the renewal of the NPDES permit. This Order is needed because BP South-West Pacific rarely conducted the monthly self-monitoring required over the life of the now expired permit. This Order does not supersede the permit nor relieve BP South-West Pacific of the responsibility to comply with existing self-monitoring requirements. Rather, this Order establishes an additional self-monitoring program expected to be in the next permit.

Specifically, the Order requires BP South-West Pacific to (1) establish accessible sampling stations at each of the four oil water separators, (2) conduct self-monitoring, at first weekly and then quarterly, of storm water drainage through the oil water separators, (3) conduct additional self-monitoring to account for all of the process wastewater discharges unrelated to storm events, and (4) document and report the date and volume of all discharges of process wastewaters unrelated to storm events. The key dates are as follows:

KEY DATES	ADMINISTRATIVE ORDER CWA-309(a)-09-011
Upon Receipt	1. Comply with the self-monitoring requirements in the existing permit.
05/30/09	2. Submit a short response to the March 7, 2009 EPA inspection report. 3. Submit a spills inventory report covering the past five years. 4. Submit a preliminary engineering plan to establish sampling stations.
06/30/09	5. Complete the installation of sampling stations.
07/01/09	6. Begin one-year of quarterly self-monitoring and reporting. Daily visual observations for sheen and foam. Monthly summaries of process wastewater discharges unrelated to storms. Quarterly sampling (storm/non-storm) for oil and grease, turbidity, pH.
07/30/09	7. Begin three-months of weekly sampling (storm/non-storm) and reporting. 7. Single priority pollutant scan of the petroleum terminal outfall. Single samples (non-storm) for benzene, ethylbenzene, toluene, lead.
06/30/10	End self-monitoring under this Order.
* * *	Self-monitoring reports are due on the 28th day of each month for the samples, observations, and reports collected during the previous calendar month.

US EPA ARCHIVE DOCUMENT

The enclosed Order and the findings that constitute the basis behind the Order are issued pursuant to Sections 308(a) and 309(a)(3), (a)(4) and (a)(5)(A) of the Clean Water Act ("the Act") as amended [33 U.S.C. Sections 1318(a) and 1319(a)(3), (a)(4) and (a)(5)(A)]. Any violation of the terms of this Order or discharge standards could subject BP South-West Pacific to a civil action for appropriate relief pursuant to Section 309(b) of the Act [33 U.S.C. Section 1319(b)] and/or penalties under Section 309(d) of the Act [33 U.S.C. Section 1319(d)] of up to \$31,500 per day of violation. In addition, under Section 309(g) of the Act [33 U.S.C. Section 1319(g)], any violation of the discharge standards could also subject BP South-West Pacific to an administrative penalty action of up to \$12,000 per day of violation not to exceed \$157,500. Sections 309(c)(1), (c)(2) and (c)(4) of the Act [33 U.S.C. Section 1319(c)(1), (c)(2) and (c)(4)] also provide penalties for negligent violations, knowing violations and knowingly making false statements.

The request for information included in this Order is not subject to review by the Office of Management and Budget (OMB) under the Paperwork Reduction Act because it is not an "information collection request" within the meaning of 44 U.S.C. Sections 3502(4), 3502(11), 3507, 3512, and 3518. Furthermore, it is exempt from OMB review under the Paperwork Reduction Act because it is directed to fewer than ten persons [44 U.S.C. Section 3502(4), 3502(11) and 5 CFR Section 1320.5(a)].

EPA has promulgated regulations to protect the confidentiality of the business information it receives. These regulations are set forth in 40 CFR Part 2, Subpart B and in the Federal Register at 41 F.R. 36902 (September 1, 1976) and 43 F.R. 40000 (September 8, 1978). A claim of business confidentiality may be asserted in the manner specified by 40 CFR Section 2.203(b) for part or all of the information requested. EPA will disclose business information covered by such a claim only as authorized under 40 CFR Part 2, Subpart B. If no claim accompanies the business information at the time EPA receives it, EPA may make it available to the public without further notice. BP South-West Pacific may not withhold from EPA any information on the grounds that it is confidential.

If you have any questions regarding this matter, please contact Greg V. Arthur of my staff at (415) 972-3504 or at [arthur.greg@epa.gov](mailto:arthur.greg@epa.gov).

Sincerely,

*Original signed by:  
Alexis Strauss*

Alexis Strauss  
Director, Water Division

Enclosure

cc: Lt. Matt Vojic, AS EPA

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 9

In the Matter of	)	
	)	
British Petroleum South-West Pacific	)	FINDING OF VIOLATION
American Samoa Terminal	)	
	)	AND ORDER
Proceedings under Section 308(a) and 309(a)(3),	)	
(a)(4) and (a)(5)(A) of the Clean Water Act, as	)	Docket No. CWA-309(a)-09-011
amended, 33 U.S.C. Section 1318(a) and	)	
1319(a)(3), (a)(4) and (a)(5)(A)	)	

**STATUTORY AUTHORITY**

The following Finding of Violation and Order (Docket No. CWA-309(a)-09-011) is issued under the authority vested in the Administrator of the U.S. Environmental Protection Agency (EPA) pursuant to Sections 308(a) and 309(a)(3), (a)(4) and (a)(5)(A) of the Clean Water Act [33 U.S.C. Sections 1318(a) and 1319(a)(3), (a)(4) and (a)(5)(A)] (hereinafter the Act). This authority has been delegated by the Administrator and the Regional Administrator of EPA Region 9 to the Director of the Water Division of EPA Region 9.

**FINDING OF VIOLATION**

The Director of the Water Division of EPA Region 9 finds that the British Petroleum South-West Pacific at the American Samoa Terminal (“BP South-West Pacific”), violated Section 301(a) of the Act [33 U.S.C. Section 1317(d)]. This Finding is made on the basis of the following facts:

1. BP South-West Pacific operates the American Samoa Terminal on the western shore of Pago Pago Harbor, in the Village of Utulei, American Samoa.
2. Section 301(a) of the Act [33 U.S.C. Section 1311(a)] prohibits the discharge of any pollutant by any person from a point source into waters of the United States except in compliance with a National Pollutant Discharge Elimination System (NPDES) permit issued in accordance with Section 402(a) of the Act [33 U.S.C. Section 1342]:



- a. Section 502(5) of the Act [33 U.S.C. Section 1362(5)] defines “person” to mean an individual, corporation, partnership, association, State, municipality, commission, or political subdivision of a State, or any interstate body;
  - b. Section 502(6) of the Act [33 U.S.C. Section 1362(6)] defines “pollutant” to mean sewage, garbage, sewage sludge, rock, sand, chemical wastes, biological materials, dredged spoil, solid waste, incinerator residue, munitions, radioactive materials, heat, wrecked or discarded equipment, cellar dirt, and industrial, municipal, and agricultural waste discharged into water;
  - c. Section 502(12) defines the term “discharge of pollutants” to mean any addition of any pollutant to navigable waters from any point source;
  - d. Section 502(7) defines the term “navigable waters” to mean the waters of the United States, including the territorial seas;
  - e. Section 502(14) defines “point source” to mean any discernible, confined and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, or vessel, or other floating craft, from which pollutants are or may be discharged.
3. BP South-West Pacific is a corporation, and is therefore a person within the meaning of Section 502(5) of the Act [33 U.S.C. Section 1362(5)], and thus subject to the provisions of the Act, [33 U.S.C. Section 1251 et seq].
  4. Pago Pago Harbor is a water of the United States.
  5. EPA issued NPDES Permit No.AS0020028 to BP South-West Pacific for the American Samoa Terminal to become effective on March 10, 2003 and set to expire on March 9, 2008. The NPDES permit authorized the discharge of storm water drainage from the American Samoa Terminal in Utulei to Pago Pago Harbor from three oil water separators at the petroleum terminal tank farm through two outfalls and from a fourth oil water



separator at the terminal fueling dock through a third outfall. The NPDES permit did not authorize the discharge of pollutants from any other sources through any other points of discharge.

6. NPDES Permit No.AS0020028 expired on March 9, 2008. The Federal regulations in 40 CFR 122.21(d) allow the administrative extension of an NPDES permit if a permit application is submitted for renewal at least 180 days before it expires. BP South-West Pacific submitted the application for renewal of the NPDES permit on September 7, 2007, before the 180 day deadline. NPDES Permit No.AS0020028 therefore is administratively extended.
7. NPDES Permit No.AS0020028 establishes discharge limits, narrative receiving water limits, pollution prevention plan development and implementation, self-certification requirements, and self-monitoring requirements. In particular, NPDES permit Sections I.A, I.B, and I.E together require BP South-West Pacific to (1) self-monitor its discharges to the harbor from the petroleum terminal outfalls and the fueling dock at least once per month, and (2) conduct monthly visual inspections of the best management practices.
8. On March 31, 2008, EPA conducted a compliance evaluation inspection of the American Samoa Terminal, and determined the following:
  - a. Facility Description: The American Samoa Terminal is owned by the American Samoa Government and operated under lease by BP South-West Pacific:
    - (1) The American Samoa Terminal consists of a petroleum terminal and a fueling dock. BP South-West Pacific receives by ship, for storage and distribution, gasoline, low-sulfur diesel, high-sulfur marine diesel, and jet fuel A-1;
    - (2) The operations at the petroleum terminal involve the loading of tanker trucks, tank farm fuel storage for distribution, and pipeline delivery to and from the fuel dock. There are ten fuel storage tanks currently in operation



at the petroleum terminal and two truck fill loading docks (designated as the top and bottom fill loading racks);

- (3) The operations at the fueling dock involve the unloading of oil tankers and the fueling of marine vessels;
- (4) The petroleum terminal and the fueling dock are all constructed with built-in secondary containment;

b. Wastewater Discharges to the Harbor: There are six wastewater drainage watersheds designated in this Order as Areas A through F. The petroleum terminal is partitioned into five watersheds, three of which drain through separate tube-coalescing oil water separators to a storm sewer system for combined discharge through a single outfall to the harbor. The other two petroleum terminal watersheds are non-operational, generating only non-contact storm water drainage. The fueling dock drains through a fourth tube-coalescing oil water separator for discharge to the harbor:

- (1) Permitted Discharges - The NPDES permit authorizes the discharge of process wastewaters and storm water drainage through three outfalls, two at the tank farm and one at the fuel dock, designated in the permit and this Order as the sample points NPDES-001, NPDES-002, and NPDES-003;
- (2) Wastewater Sources – The wastewaters generated on-site include tank bottoms (condensate and entrained waters drawn from the fuel storage tanks), hose pressure test waters, tank farm drainage, fuel dock drainage, loading rack drainage, washdown, and spills;
- (3) Area A Drainage - BP South-West Pacific reconstructed and upgraded the bottom fill loading rack in 2006 to isolate and divert the loading rack drainage into an oil water separator for discharge through the outfall designated in the permit and this Order as the sample point NPDES-002.



As a result, since the start of 2007, Area A generates only storm water drainage from the remaining non-operational paving areas for discharge to the harbor through the outfall designated in the permit and this Order as the sample point NPDES-001. This means NPDES-001 no longer would be under regulation by permit;

- (4) Area B Drainage – Spills, washdown, and drainage from the reconstructed bottom fill loading rack discharges through an oil water separator to a storm water culvert leading to the harbor. The effluent from this oil water separator is designated in this Order as NPDES-002B. A bypass line for this oil water separator is designated in this Order as NPDES-002BX;
- (5) Area C Drainage – Spills, washdown, and drainage from the lower tank farm discharges through an oil water separator to a storm water culvert leading to the harbor. The effluent from this oil water separator is designated in this Order as NPDES-002C;
- (6) Area D Drainage – Spills, washdown, and drainage from the upper tank farm discharges through an oil water separator to a storm water culvert leading to the harbor. The effluent from this oil water separator is designated in this Order as NPDES-002D;
- (7) Area E Drainage – Storm water run-off from a decommissioned back lot tank farm discharges to a stream leading to the harbor. The discharge point was designated in earlier versions of the permit as NPDES-005 but no longer is under regulation by permit;
- (8) Area F Drainage – Spills, washdown, and drainage from the fore dock of the fueling dock collect within secondary containment through an oil water separator. The effluent from this oil water separator is designated in the permit and this Order as NPDES-003.





9. BP South-West Pacific violated Section 301(a) of the Act [33 U.S.C. Section 1311(a)] in that:
  - a. Sections I.A and I.B of NPDES Permit No.AS0020028 require BP South-West Pacific to self-monitor the discharges through NPDES-001 once per month for flow, oil and grease, and pH, once per quarter for turbidity, and once per year for benzene, ethylbenzene, toluene, and lead;
  - b. Sections I.A and I.B of NPDES Permit No.AS0020028 require BP South-West Pacific to self-monitor the discharges through NPDES-002 once per month for flow, oil and grease, and pH, once per quarter for turbidity, and once per year for benzene, ethylbenzene, toluene, and lead;
  - c. Sections I.A and I.B of NPDES Permit No.AS0020028 require BP South-West Pacific to self-monitor the discharges through NPDES-003 once per month for flow, oil and grease, and pH;
  - d. Section I.E of NPDES Permit No.AS0020028 requires BP South-West Pacific to report all self-monitoring results once per quarter;
  - e. Samples were collected and reported for the three outfalls on just five occasions over the past five years, from March 2004 through December 2008. As a result, BP South-West Pacific failed to collect samples and report results from NPDES-002 on at least 54 occasions, from NPDES-003 on at least 54 occasions, and from NPDES-001 on at least 30 occasions;
  - f. The failure to sample and report resulted in a total of at least 138 days of violation. See Table 9(f) on the next page.
10. The March 7, 2009 EPA report of the March 31, 2008 inspection of BP South-West Pacific is by reference made part of this Order.



**Table 9(f)**  
 BP South-West Pacific - Self-Monitoring Record for 2004 through 2008

Sample Dates	NPDES 001	NPDES 002	NPDES 003	PPP Cert	Sample Dates	NPDES 001	NPDES 002	NPDES 003	PPP Cert
Dec 2008	-	NS	NS	✓	Jun 2006	NS	NS	NS	✓
Nov 2008	-	NS	NS	✓	May 2006	NS	NS	NS	✓
Oct 2008	-	NS	NS	✓	Apr 2006	NS	NS	NS	✓
Sep 2008	-	NS	NS	✓	Mar 2006	NS	NS	NS	✓
Aug 2008	-	NS	NS	✓	Feb 2006	NS	NS	NS	✓
Jul 2008	-	NS	NS	✓	Jan 2006	01/31	01/31	01/31	✓
Jun 2008	-	NS	NS	✓	Dec 2005	NS	NS	NS	✓
May 2008	-	NS	NS	✓	Nov 2005	NS	NS	NS	✓
Apr 2008	-	NR	NR	NR	Oct 2005	NS	NS	NS	✓
Mar 2008	-	NR	NR	NR	Sep 2005	09/28	09/28	09/28	✓
Feb 2008	-	NR	NR	NR	Aug 2005	NS	NS	NS	✓
Jan 2008	-	NS	NS	✓	Jul 2005	NS	NS	NS	✓
Dec 2007	-	NS	NS	✓	Jun 2005	NS	NS	NS	✓
Nov 2007	-	NS	NS	✓	May 2005	NS	NS	NS	✓
Oct 2007	-	NS	NS	✓	Apr 2005	NS	NS	NS	✓
Sep 2007	-	NS	NS	✓	Mar 2005	NS	NS	NS	✓
Aug 2007	-	NS	NS	✓	Feb 2005	NS	NS	NS	✓
Jul 2007	-	NS	NS	✓	Jan 2005	NS	NS	NS	✓
Jun 2007	-	NS	NS	✓	Dec 2004	12/09	NS	NS	✓
May 2007	-	NS	NS	✓	Nov 2004	NS	NS	NS	✓
Apr 2007	-	NS	NS	✓	Oct 2004	10/14	10/14	10/14	✓
Mar 2007	-	NS	NS	✓	Sep 2004	NS	NS	NS	✓
Feb 2007	-	NS	NS	✓	Aug 2004	NS	NS	NS	✓
Jan 2007	-	NS	NS	✓	Jul 2004	NS	NS	NS	✓
Dec 2006	NS	NS	NS	✓	Jun 2004	NS	NS	NS	✓
Nov 2006	NS	NS	NS	✓	May 2004	NS	NS	NS	✓
Oct 2006	NS	NS	NS	✓	Apr 2004	NS	NS	NS	✓
Sep 2006	NS	NS	NS	✓	Mar 2004	03/25	03/25	03/25	✓
Aug 2006	NS	NS	NS	✓	Days of Violation	30	54	54	3
Jul 2006	NS	NS	NS	✓					

NS - No sample results reported.

NR – No report submitted.

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### **ADMINISTRATIVE ORDER**

Taking these Findings into consideration and considering the potential environmental and human health effects of the violations and all good faith efforts to comply, EPA has determined that compliance in accordance with the following requirements is reasonable. Pursuant to Section 308(a) and 309(a)(3), (a)(4) and (a)(5)(A) of the Act [33 U.S.C. Section 1318(a) and 1319(a)(3), (a)(4) and (a)(5)(A)], IT IS HEREBY ORDERED that BP South-West Pacific comply with the following requirements:

#### *Comply with NPDES Permit Requirements*

1. **UPON RECEIPT OF THIS ORDER**, BP South-West Pacific shall comply with the self-monitoring requirements in NPDES permit No. AS0020028.

#### *Submission of Information*

2. By **MAY 30, 2009**, BP South-West Pacific shall submit short responses to the findings in Sections 2.0, 3.0, 3.1, 4.0, 4.1, and 4.2 of the March 7, 2009 EPA inspection report.
3. By **MAY 30, 2009**, BP South-West Pacific shall submit a spill inventory report of all significant spills and significant leaks of petroleum distillates that have occurred at the American Samoa Terminal in the five years between March 2004 and December 2008.

#### *Sampling Stations*

4. By **MAY 30, 2009**, BP South-West Pacific shall submit a preliminary engineering plan for the installation of sampling stations for the effluent discharge lines from each of the four oil water separators. This preliminary engineering plan shall include:
  - a. A detailed description of all plant, equipment, upgrades, materiel, hardware, piping, best management plans, standard operating procedures, and inspection schedules, and to be used to install sampling stations for the effluent discharge



- lines from each of the four oil water separators (referred to in this Order as NPDES-002B, NPDES-002C, NPDES-002D, and NPDES-003);
- b. Each sampling station must allow for representative sampling of the effluent discharge from the oil water separator, as well as for unencumbered access by plant personnel, Federal or territorial government inspectors, or their contractors, in particular without needing to obtain confined space permits;
  - c. A schedule of all corrective actions to be made in order to install sampling stations for the effluent discharge lines from each of the four oil water separators, not to extend beyond the deadline specified in Item 5 of this Order.
5. By **JUNE 30, 2009**, BP South-West Pacific shall complete the installation of the sampling stations for the effluent discharge lines from each of the four oil water separators (referred to in this Order as NPDES-002B, NPDES-002C, NPDES-002D, and NPDES-003), *and* submit a notice of completion.

*Self-Monitoring Schedules*

6. Baseline Sampling Schedule: For a year, from **JULY 1, 2009 THROUGH JUNE 30, 2010**, BP South-West Pacific shall self-monitor the non-domestic wastewater discharges at the oil water separator sampling stations installed as required by Items 4 and 5 of this Order, and designated in this Order as NPDES-002B, NPDES-002C, NPDES-002D, NPDES-003, as well as at the petroleum terminal outfall, designated in the permit and this Order as NPDES-002, in accordance with the following schedule:
- a. **ONCE EVERY DAY**, BP South-West Pacific shall visibly observe the outfall discharges to the harbor (NPDES-002, NPDES-003) for visible oily sheen and foam;
  - b. **ONCE EVERY MONTH**, BP South-West Pacific shall summarize the date, source, and volume of all process wastewaters (unrelated to storm events)



released into the oil water separators, and discharged during the month, including all tank bottoms, hose pressure test waters, washdown, and spills;

- c. **ONCE EVERY QUARTER**, during discharges that account for storm events, BP South-West Pacific shall self-monitor the discharge from each oil water separator sampling station (NPDES-002B, NPDES-002C, NPDES-002D, NPDES-003) for oil and grease, turbidity, and pH;
  - d. **AT LEAST ONCE EVERY QUARTER**, during discharges that account for the contributions from each of the process wastewater sources, BP South-West Pacific shall self-monitor the discharges from the oil water separator sampling stations (NPDES-002B, NPDES-002C, NPDES-002D, NPDES-003) for oil and grease, turbidity, and pH;
7. **Supplemental Sampling Schedule:** For three months, from **JULY 1, 2009 THROUGH SEPTEMBER 30, 2009**, BP South-West Pacific shall self-monitor the non-domestic wastewater discharges at the oil water separator sampling stations installed as required by Items 4 and 5 of this Order, and designated in this Order as NPDES-002B, NPDES-002C, NPDES-002D, NPDES-003, as well as at the petroleum terminal outfall, designated in the permit and this Order as NPDES-002, in accordance with the following schedule:
- a. **ONCE EVERY WEEK**, during discharges that account for storm events, BP South-West Pacific shall self-monitor the discharge from each oil water separator sampling station (NPDES-002B, NPDES-002C, NPDES-002D, NPDES-003) for oil and grease, turbidity, and pH;
  - b. **ONCE BEFORE JULY 30, 2009**, BP South-West Pacific shall self-monitor the discharge from the petroleum terminal outfall to the harbor (NPDES-002) for the priority pollutants as listed in 40 CFR 131.36;
  - c. **AT LEAST ONCE BEFORE JULY 30, 2009**, during discharges that account for the contributions from each of the process wastewater sources, BP South-West

Pacific shall self-monitor the discharges from the oil water separator sampling stations (NPDES-002B, NPDES-002C, NPDES-002D, NPDES-003) for oil and grease, benzene, ethylbenzene, toluene, lead, turbidity, and pH.

8. Sampling and Analysis: BP South-West Pacific shall self-monitor and analyze using the sampling protocols listed below, and the EPA approved analytical methods in 40 CFR 136 (or equivalent) necessary to achieve the detection limits indicated below:

parameters and pollutants	sampling method protocols	detection limits
oily sheen and foam	visual observation	-
Turbidity	grab	1 NTU
oil and grease – total	grab	1 mg/l
pH (s.u.)	field grab measurement	0.1 s.u.
Benzene	grab	1 µg/l
Ethylbenzene	grab	1 µg/l
Toluene	grab	1 µg/l
total lead	grab	1 µg/l
priority pollutant scan	in accordance with 40 CFR 136	various

*Submittals*

9. By the **TWENTY-EIGHTH (28<sup>th</sup>) DAY OF EACH MONTH**, BP South-West Pacific shall submit all self-monitoring and self-reporting results for the previous month as required in Items 6, 7, and 8 of this Order. The first monthly report is due on August 28, 2009 for the July 2009 self-monitoring. The 12th-and-last monthly report is due on July 28, 2010 for the June 2010 self-monitoring.
10. For each sample, BP South-West Pacific shall record the following:
- The sample results;
  - The EPA analytical methods used;
  - The date, time, location of sampling, and sampling point;
  - The type of sample (ie. 24-hour composite, grab, or manual composite);
  - The name of the laboratory used.



11. All reports submitted pursuant to this Order shall be signed by a principal executive officer of BP South-West Pacific and shall include the following self-certifying statement:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I certify that all wastewater samples analyzed and reported herein are representative of the ordinary process wastewater flow from this facility. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

12. This Order is not and shall not be interpreted to be an NPDES permit under Section 402 of the Act [33 U.S.C. Section 1342], nor shall it in any way relieve BP South-West Pacific of obligations imposed by the Act, or any other Federal, State or local law.

13. All submittals shall be mailed to the following addresses:

U.S. ENVIRONMENTAL PROTECTION AGENCY  
75 Hawthorne Street  
San Francisco, California 94105  
Attn: Greg V. Arthur (WTR-7)

AMERICAN SAMOA ENVIRONMENTAL PROTECTION AGENCY  
P.O. Box PPA  
Pago Pago, American Samoa 96799  
Attn: Lt. Matt Vojik

14. This Order takes effect upon signature.

*Original signed by:*  
*Alexis Strauss*

\_\_\_\_\_  
Alexis Strauss  
Director, Water Division

**March 19, 2009**

\_\_\_\_\_  
Dated