



Donald C. Staats
Vice President
Galveston Bay Refinery

Blanchard Refining Company LLC
A subsidiary of Marathon Petroleum Company LP

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December 12, 2018

**CERTIFIED MAIL # 7015 3430 0000 8819 7905
RETURN RECEIPT REQUEST**

U.S. Environmental Protection Agency – Region 6
Attn: Justin McDowell (6EN-AS)
1445 Ross Avenue – Suite 1200
Dallas, Texas 75202-2733
McDowell,Justin@epa.gov

**RE: Administrative Order on Consent
In the Matter of Blanchard Refining Company, LLC – Texas City, Texas
Docket No. CAA-06-2018-3357**

Dear Mr. McDowell:

The U.S. Environmental Protection Agency ("EPA") and Blanchard Refining Company LLC ("Blanchard") entered into that certain Administrative Order on Consent, Docket No. CAA-06-2018-3357, with an effective date of the 25th of September 2018 ("AOC"). In the AOC, Blanchard was required to complete certain corrective actions. This letter serves to communicate to EPA the completion of those certain corrective action.

For convenience, AOC language is provided in Italics with Blanchard's response provided immediately below. Pursuant to Paragraph 40 of the AOC, Blanchard was required to complete the following corrective actions within 90 days of the effective date:

- 40.a.i: *Certify that Respondent has created a management of change procedure for heat exchanger gasket design.*
 - **Blanchard's response:** Blanchard created a management of change procedure for heat exchanger gasket design.
- 40.a.ii: *Submit a plan and implementation schedule for re-measurement of outer gasket locations on all ULC high pressure exchangers using the dual rail gasket design. The implementation schedule submitted pursuant to this Order may be adjusted following submission to account for modifications to the corresponding turnaround schedule.*
 - **Blanchard's response:** Blanchard's plan for re-measurement of outer gasket locations in the ULC is provided in the Attachment.
- 40.a.iii: *Respondent will notify the double rail gasket manufacturer (Advanced Sealing) concerning the lessons learned from incident investigation report number 165228.*
 - **Blanchard's response:** Blanchard notified the double rail gasket manufacturer, Advanced Sealing, of the lessons learned from the incident investigation report.

U.S. Environmental Protection Agency – Region 6
Attn: Justin McDowell
December 11, 2018

Certification

1. I am Vice President of Blanchard Refining Company LLC.
2. I certify under the penalty of law that this document and all its attachments were prepared by me or under my direct supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated 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, the information submitted to the best of my knowledge and belief, is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



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Vice President
Blanchard Refining Company LLC

If you have any questions, please do not hesitate to contact Eric Kaysen at 409-491-6680 or ERKaysen@marathonpetroleum.com.

Best Regards,



Donald C. Staats
Vice President
Blanchard Refining Company LLC

EK/dm

ATTACHMENTS

Attachment – Implementation Schedule

U.S. Environmental Protection Agency – Region 6
Attn: Justin McDowell
December 11, 2018

Attachment

Implementation Schedule

There is a total of 24 ULC exchangers that incorporate(d) the dual rail gasket design. Blanchard will disassemble the ULC exchangers and remeasure and/or replace the gaskets in phases as follows:

- **2018:** By March 31, 2018 Blanchard completely replaced two (2) exchangers with new exchangers not subject to dual rail design.
- **2020:** By December 31, 2020, Blanchard will remeasure gaskets on six (6) exchangers and will completely replace three (3) additional exchangers that will not be subject to dual rail design.
- **2022:** By December 31, 2022, Blanchard will remeasure gaskets on seven (7) exchangers.
- **2024:** By December 31, 2024, Blanchard will remeasure gaskets on two (2) exchangers and completely replace eight (8) exchangers with new exchangers that will not be subject to dual rail design.

Note: The total number of exchangers above adds up to more than 24 because some exchangers will be remeasured in one year and subsequently replaced in a later year. Thus, they are accounted for twice in the schedule above.