



July 20, 2009

BP Exploration (Alaska) Inc.
900 East Benson Boulevard
P.O. Box 196612
Anchorage, Alaska 99519-6612
(907) 561-5111

Rick Albright, Director
Office of Air, Waste and Toxics
U.S. Environmental Protection Agency
Region 10, AWT-128
1200 6th Ave., Suite 900
Seattle, WA 98101

Re: Notice of Intent: RCRA Standardized Permit
Prudhoe Bay Unit, RCRA ID AKD000643239

Dear Mr. Albright,

BP Exploration (Alaska) Inc. (BPXA) is pleased to submit this Notice of Intent and request to operate the Prudhoe Bay facility under a Resource Conservation and Recovery Act (RCRA) Standardized Permit for Storage and Treatment. In accordance with the standardized permit eligibility requirements in 40 CFR Part 124.201(a)(1), BPXA intends to generate and then store or non-thermally treat hazardous waste on-site in containers at the Prudhoe Bay facility. The Prudhoe Bay facility currently stores hazardous waste in containers under RCRA interim status and is assigned EPA ID No. AKD000643239.

This Notice of Intent includes the following information and certifications required under 40 CFR Part 270, Subpart J, "RCRA Standardized Permits for Storage and Treatment Units"; specifically, the information listed in 40 CFR 270.275:

- (a) The Part A information described in §270.13. The Part A is signed by BPXA as the facility operator and the State of Alaska Department of Natural Resources as landowner.
- (b) A meeting summary and other materials required by 40 CFR 124.31.
- (c) Documentation of compliance with the location standards of 40 CFR 267.18 and §270.14(b)(11).
- (d) Information that allows the Director to carry out EPA's obligations under other Federal laws required in §270.3.
- (e) Solid waste management unit information required by §270.14(d).
- (f) A certification meeting the requirements of §270.280, and an audit of the Prudhoe Bay facility's compliance status with 40 CFR part 267 as required by §270.280.
- (g) A closure plan prepared in accordance with part 267, subpart G.
- (h) The most recent closure cost estimate for the Prudhoe Bay facility prepared under §267.142 and a copy of the documentation required to demonstrate financial assurance under §267.143.

Environmental Protection Agency

July 20, 2009

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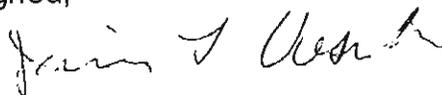
The information listed above is included in the attached Notice of Intent, RCRA Standardized Permit Application binder. Three hard copies of the application and one electronic copy on CD are included. In addition, we prepared one hard copy of the application binder that we will deliver to the Alaska Operations Office here in Anchorage.

If you have questions or desire additional information regarding this Notice of Intent, please contact me at 907-564-5146 or Janice.vosika@bp.com or Colleen Burgh, BPXA Waste Management Compliance Authority at 907-564-5229 or colleen.burgh@bp.com.

In accordance with 40 CFR 270.11(d)(1):

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to 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, the information submitted is, to the best of my knowledge and belief, 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.

Signed,



Janice L. Vosika
BPXA Greater Prudhoe Bay Field Manager

cc: Robbie Hedeem, EPA Region 10

Attachment: Notice of Intent
RCRA Standardized Permit Application
BP Exploration (Alaska) Inc.
Prudhoe Bay Unit
EPA ID# AKD000643239
July 2009
(3 binders, 1 CD)

Notice of Intent

RCRA Standardized Permit Application

**BP Exploration (Alaska) Inc.
Prudhoe Bay Unit
EPA ID# AKD000643239**

Prepared By

**BP Exploration (Alaska) Inc.
900 East Benson Boulevard
P.O. Box 196612
Anchorage, Alaska 99519-6612**



**Revision 0
July 2009**

Introduction

BP Exploration (Alaska) Inc.
Prudhoe Bay Unit
RCRA ID AKD000643239

Hazardous Waste Standardized Permit Application

Introduction

BP Exploration (Alaska) Inc. (BPXA) has prepared a Notice of Intent (NOI) and application to manage hazardous waste at the Prudhoe Bay facility under a Resource Conservation and Recovery Act (RCRA) Standardized Permit for Storage and Treatment Units (standardized permit) in accordance with regulations in 40 CFR 267. BPXA intends to generate hazardous waste at the Prudhoe Bay facility and then store or non-thermally treat the hazardous waste on-site in containers as described in permit eligibility requirements in 40 CFR 270.255(a)(1). The United States Environmental Protection Agency (EPA) Facility ID number for this facility is AKD000643239. This application package is prepared in accordance with the requirements in 40 CFR 270.275.

The Notice of Intent application package includes 8 sections as follows:

- Section 1 includes the Part A Application described in 40 CFR 270.13, which includes completed and updated EPA Forms 8700-12 and 8700-23 with attached maps, drawings, photographs, and other required information and signatures by BPXA as facility operator and State of Alaska Department of Natural Resources as land owner. [40 CFR 270.275 (a)].
- Section 2 includes a summary of the public meeting and other meeting materials required in 40 CFR 124.31, including the meeting notice and a list of attendees. [40 CFR 270.275 (b)]
- Section 3 includes documentation of compliance with the applicable location standards in 40 CFR 267.18 and 270.14(b)(11), including a floodplain map of the area. [40 CFR 270.275 (c)]
- Section 4 provides information on the specific obligations of EPA under the federal laws identified in 40 CFR 270.3. [40 CFR 270.275 (d)]
- Section 5 provides solid waste management unit information required by 40 CFR 270.14(d), which includes references to the *Administrative Order for Corrective Action under Section 3008(h) of RCRA, BPXA's Prudhoe Bay Facility, EPA ID No. AKD000643239, EPA Docket No: RCRA-10-2007-022, October 3, 2007* and the *Administrative Order on Consent, Tuboscope Site, BP Exploration (Alaska) Inc., Prudhoe Bay Western Operating Area, EPA Docket No: RCRA-10-99-0179, August 6, 1999*. [40 CFR 270.275 (e)]
- Section 6 includes a compliance certification and the report of an audit of the facility's compliance status with 40 CFR 267, as required by 40 CFR 170.280. [40 CFR 270.275 (f)]
- Section 7 includes a closure plan prepared in accordance with 40 CFR 267, subpart G, and the most recent closure cost estimate prepared under 40 CFR 267.142. [40 CFR 270.275 (g and h)]
- Section 8 includes a demonstration of financial assurance under 40 CFR 267.143, which consists of the financial assurance documentation that was submitted to EPA Region 10 in March 2009, in compliance with annual financial assurance requirements in 40 CFR 265.143(e)(5). [40 CFR 270.275 (h)]

Section 1

Part A Information [40 CFR 270.275 (a)]

BP Exploration (Alaska) Inc.
Prudhoe Bay Unit
RCRA ID AKD000643239

Hazardous Waste Standardized Permit Application
Section 1 - Part A

Section 1 of the RCRA standardized permit application for the BPXA Hazardous Waste Process Facility (HWPF) in the Prudhoe Bay Unit (PBU) oil field includes a completed Part A. The Part A consists of the EPA Form 8700-23 (includes both the RCRA Subtitle C Site Identification Form and the Hazardous Waste Permit Information Form) in Attachment 1, along with maps, drawings and photographs (Figures 1-1 through 1-13) and a listing of active and pending regulatory permits (Table 1-1), as required by 40 CFR 270.275 and 40 CFR 270.13.

Introduction

BPXA has interim status to operate the PBU as an existing hazardous waste management facility (RCRA Facility ID AKD000643239). The PBU is leased by BPXA from the State of Alaska Department of Natural Resources. The PBU RCRA hazardous waste management facility, by agreement of the EPA, is any land or operation under BPXA control within the PBU on the North Slope of Alaska; i.e., the operating facility. For purposes of this application, it is generally referred to as the Prudhoe Bay facility.

The regulated hazardous waste container storage unit that subjects the entire Prudhoe Bay facility to RCRA permitting is the HWPF. The HWPF is situated on the gravel pad containing BPXA's BOC complex, and is a 50' x 60' structural steel frame building with insulated wall panels and a sealed concrete floor founded on steel piling.

BPXA submitted a revised Part B permit application in June 1998 to provide Part B permit application information of the HWPF as-built and to update the Part B permit application initially submitted on November 8, 1988. EPA authorized a change under interim status in the year 2000 to allow BPXA to begin storing hazardous waste generated on-site in the HWPF for greater than 90 days.

The Part A information and additional detail regarding the PBU RCRA facility and the HWPF storage unit are presented in this section.

Part A Contents

40 CFR 170.13 Contents of part A of the permit application

(a) The activities conducted by the applicant which requires it to obtain a permit under RCRA.

The activity for which BPXA is applying for a RCRA standardized permit under 40 CFR 270.275 is storage and non-thermal treatment of hazardous waste in containers, for hazardous waste generated by the BPXA Prudhoe Bay facility.

(b) Name, mailing address, and location, including longitude and latitude of the facility for which the application is submitted.

BP Exploration (Alaska) Inc.
Prudhoe Bay Unit
Prudhoe Bay, AK 99744

Mailing Address:
P.O. Box 196612
Anchorage, AK 99519-6612

Latitude: 70°13'024"
Longitude: 148°28'049"

(c) Up to four SIC codes which best reflect the principal products or services provided by the facility.

1311 Crude Oil Petroleum & Natural Gas Exploration, Development and Production

(d) The operator's name, address, telephone number, ownership status, and status as Federal, State, private, public, or other entity.

Operator: BP Exploration (Alaska) Inc.
900 East Benson Blvd.
P.O. Box 196612
Anchorage, AK 99519-6612
Contact Phone: 907-564-5229

Operator Type: Private
Ownership Status: State (landowner)

(e) The name, address, and phone number of the owner of the facility.

Landowner: State of Alaska
Department of Natural Resources

Contact: Chris Milles, Regional Manager
Northern Regional Office
Alaska Department of Natural Resources

Division of Mining, Land and Water
3700 Airport Way
Fairbanks, AK 99709
Phone: 907-451-2711

(f) Whether the facility is located on Indian lands.

The Prudhoe Bay facility is not located on Indian lands.

(g) An indication of whether the facility is new or existing and whether it is a first or revised application.

The Prudhoe Bay facility is an existing facility, and the HWPF container storage unit is an existing unit. The Part A is a revised submittal for purposes of application for a RCRA standardized permit for hazardous waste container storage and non-thermal treatment. It updates Part A information that was originally submitted to EPA when interim status was granted in 1982 and updates that have been submitted by BPXA during the interim status period.

(h) For existing facilities, (1) a scale drawing of the facility showing the location of all past, present, and future treatment, storage and disposal areas; and (2) photographs of the facility clearly delineating all existing structures; existing treatment, storage, and disposal areas; and sites of future treatment, storage and disposal areas.

Figure 1-1 is a scale drawing of the PBU, which is approximately 385 square miles in size and comprised of an Eastern Operating Area (EOA) and a Western Operating Area (WOA). The EOA is 192 square miles in size and the WOA is 193 square miles. Figure 1-1A is a drawing of the Deadhorse area. Land excluded from the Prudhoe Bay facility within the EOA encompasses individual Deadhorse lease tracts (except Mukluk Pad and Permafrost Pad), including the Deadhorse Airport; the North Slope Borough's Oxbow Landfill; Pump Station 1; specific gravel quarries; and properties of oil industry support contractors. Within the WOA, excluded areas include the Trans-Alaska pipeline, select exploration drilling sites, the Kuparuk River Unit pipeline, Frontier Pad, and Service City Pad.

Some of the major pipeline corridors and rights-of-way that are shown with hatched lines on Figure 1-1 contain both PBU pipelines and pipelines owned and operated by non-BPXA and non-PBU entities. Within pipeline corridors and rights-of-way, only BPXA PBU pipelines and related structures are included in the RCRA Prudhoe Bay facility.

The past and present treatment, storage, and disposal areas include the following:

EOA C Pad –past hazardous waste storage unit located at the EOA C Pad, which operated under RCRA interim status from 1986 to 1992. BPXA completed clean closure of the EOA C Pad and submitted a certification of closure and risk assessment to EPA Region 10 in May 2005. EPA accepted the certificate of closure in correspondence dated

February 27, 2007. In March 5, 2007 correspondence, EPA documented that the EOA C-Pad had completed clean closure and released BPXA from financial assurance specific to closure of the EOA C Pad.

WOA C Pad –past hazardous waste storage unit located at the WOA C Pad, which operated under RCRA interim status from 1982 to 2000, when hazardous waste storage operations were transferred to the HWPF. BPXA completed clean closure of the WOA C Pad and submitted a certification of closure to EPA Region 10 in August 2004. EPA accepted the certificates of closure in correspondence dated February 27, 2007. In March 5, 2007 correspondence, EPA documented that the WOA C-Pad had completed clean closure and released BPXA from financial assurance specific to closure of the WOA C-Pad.

HWPF– current RCRA container storage unit within the Prudhoe Bay facility, located next to the BOC. The HWPF office is located in a separate building adjacent to the HWPF building.

Other than the HWPF, no future treatment, storage, or disposal areas are planned for the Prudhoe Bay facility.

Figure 1-2 is a scale drawing of the immediate vicinity of the HWPF location. This drawing shows the storage unit and adjacent office building, as well as their location relative to the BOC and surrounding infrastructure.

Figure 1-3 is a drawing of the storage unit building floor plan, which shows general building features and the typical interior layout available for hazardous waste container storage. Figure 1-4 is a scale drawing of the building that shows the location of a proposed loading dock and leveler system, which is planned for construction in summer 2009. The loading dock will consist of a 90 square foot addition to the south side of the building and will house a mechanical dock leveler. Figure 1-5 is a design drawing that shows the dock leveler and the building modification in greater detail. The new loading dock and leveler will be used to facilitate the transfer of loaded containers from inside the storage unit to waiting transport vehicles. Secondary containment for hazardous waste during unloading, storage, and loading operations is provided by the building's interior containment system and container-specific controls such as storage cabinets, spill-control pallets and container overpacks. Vehicles must enter inside the building for offloading and waste acceptance, where secondary containment is provided by the building's containment system for all hazardous waste inside the building. When wastes are removed from the building and transferred via the existing loading dock into waiting transport vehicles, secondary containment continues to be provided for all applicable hazardous wastes, primarily by use of container overpacks. The proposed loading dock and leveler system will provide for secondary containment similar to the existing loading dock and will not increase the container storage capacity within the building.

Figures 1-6 through 1-8 are a series of three aerial photographs that show the entire Prudhoe Bay facility and the general layout of existing oil and gas exploration,

development, and production structures. Figure 1-9 is an aerial photograph that shows the HWPF and adjacent office building locations in greater detail.

(i) A description of the processes to be used for treating, storing, and disposing of hazardous waste, and the design capacity of these items.

The HWPF storage unit will be used for storage of hazardous waste in containers. The applicable process code is S01. For purposes of closure, the maximum design capacity for container storage is estimated at 444 55-gallon drums, or approximately 24,420 gallons.

(j) A specification of the hazardous wastes listed or designated under 40 CFR part 261 to be treated, stored, or disposed of at the facility, an estimate of the quantity of such wastes to be treated, stored, or disposed annually, and a general description of the processes to be used for such wastes.

Section 10 of the Part A application form includes a current listing of hazardous wastes that are listed or designated under 40 CFR Part 261, which may be stored or non-thermally treated at the HWPF storage unit under a standardized permit. This listing was compiled from historical Part A applications that have been submitted for the Prudhoe Bay facility and information in material receipt logs maintained at the storage unit. An estimate of the potential annual quantity of the wastes to be stored or non-thermally treated is also included. The general process that will be used for all hazardous waste is storage and non-thermal treatment in containers.

(k) A listing of all permits or construction approvals received or applied for under any of the following programs:

- (1) Hazardous Waste Management program under RCRA*
- (2) UIC program under the Safe Drinking Water Act (SDWA)*
- (3) NPDES program under the Clean Water Act (CWA)*
- (4) Prevention of Significant Deterioration (PSD) program under the Clean Air Act*
- (5) Nonattainment program under the Clean Air Act*
- (6) National Emissions Standards for Hazardous Pollutants (NESHAPS) preconstruction approval under the Clean Air Act.*
- (7) Ocean dumping permits under the Marine Protection Research and Sanctuaries Act*
- (8) Dredge or fill permits under section 404 of the CWA*
- (9) Other relevant environmental permits, including State permits*

Table 1-1 is a listing of the permit types, permit numbers, and descriptions for the following types of primary and relevant active BPXA permits and pending permit applications for the PBU as of May 2009:

R Resource Conservation and Recovery Act

- U Underground Injection Control (UIC) program under the Safe Drinking Water Act
- N National Pollution Discharge Elimination System (NPDES) under the Clean Water Act
- P Prevention of Significant Deterioration under the Clean Air Act
- F Dredge or Fill Permits under Section 404 of the Clean Water Act
- E Other relevant environmental permits. For the PBU, these include relevant State of Alaska and North Slope Borough permits, authorizations, and approvals.

(1) A topographic map (or other map if a topographic map is unavailable) extending one mile beyond the property boundaries of the source, depicting the facility and each of its intake and discharge structures; each of its hazardous waste treatment, storage, or disposal facilities; each well where fluids from the facility are injected underground; and those wells, springs, or other surface water bodies, and drinking water wells listed in public records or otherwise known to the applicant within 1/4 mile of the facility property boundary.

Figure 1-10 is a map of the PBU showing the legal boundary of the Prudhoe Bay facility, map scale, a meridian arrow showing north, and latitude and longitude at the nearest whole second. In order to show the information presented on Figure 1-10 in greater detail, a series of three maps that depict the eastern, central, and western areas of the facility at a larger scale are included as Figures 1-11 through 1-13.

The maps indicate the following features and structures required in 40 CFR 270.13(l):

Intake structures (drinking water intakes)

Prudhoe Bay Operations Center (PBOC)
 ADEC Public Water System ID# AK2331011
 Class I public water system; non-transient, non-community water system
 Water source: surface water

Central Water Treatment Facility at BOC
 (with backup water supply from the Kuparuk River at M Pad)
 ADEC Public Water System ID# AK2333013
 Class I public water system; non-transient, non-community water system
 Water source: surface water

Seawater intake at Seawater Treatment Plant at West Dock
 (no permit needed due to small size)

Discharge structures (wastewater discharges)

PBOC Domestic Wastewater Treatment Plant
 NPDES Permit AKG570006

ADEC Authorization AKG570006

Prudhoe Bay BOC
Central Sewage Treatment Facility
NPDES Permit AKG570005
ADEC Authorization AKG570005

Prudhoe Bay Waterflood Operations discharge
West Dock
NPDES Permit AKD029840
ADEC Permit AKD029840

Hazardous waste treatment, storage, or disposal facilities

The current HWPF RCRA interim status storage unit for process code S01 is shown located next to the BOC in the WOA.

Wells where fluids are injected underground

The following underground injection wells for disposal of non-hazardous and RCRA Exploration and Production-exempt fluids are shown on the maps:

UIC Class I and Class II (D) wells:
Grind and Inject Facility (GNI-01, GNI-02A, GNI-03, GNI-04)

UIC Class I wells:
Pad 3 Oily Waste Injection Facility (OWDW-NW, OWDW-SW, OWDW-SE)

UIC Class II (D) wells:
Gathering Center 1: GC-01D, GC-01E
Gathering Center 2: GC-02A (inactive), GC-02C, GC-02E
Gathering Center 3: GC-03D
Flow Station 1: PWDW 1-1, PWDW 1-2A
Flow Station 2: PWDW 2-1 (inactive)
Flow Station 3: PWDW 3-1
Lisburne Production Center: LPC-1, LPC-2
CC-2A (inactive)
H Pad: H-03A

In addition to the disposal injection wells, many of the production pads throughout the Prudhoe Bay facility also contain underground injection wells used for enhanced oil recovery (EOR). The EOR wells inject source water (seawater or Prinz Creek water), miscible gas or produced natural gas, or other approved fluids into oil producing formations for enhanced oil recovery. The wells are not used for fluids disposal and are not included on the maps.

Wells, springs, or other surface water bodies, and drinking water wells listed in public records or otherwise known to the applicant within ¼ mile of the facility property boundary

Figure 1-10 (and the larger maps in Figures 1-11 through 1-13) shows surface water within and surrounding the Prudhoe Bay, including surface water that is used for two drinking water intakes for Deadhorse lease tracts, which are located within ¼ mile of the Prudhoe Bay facility boundary.

(m) A brief description of the nature of the business.

BPXA is the operator and an owner of numerous crude oil and natural gas exploration, development, and production fields, including the PBU. The Prudhoe Bay facility includes operations and infrastructure related to oil and gas production operations and support facilities. These include, but are not limited to, oil and gas production wells, water and gas injection wells, operations centers, several flow stations/gathering centers, a central compressor plant, a central power plant, a seawater treatment plant, a seawater injection plant, a grind and inject facility, and a crude oil topping unit. Support facilities include vehicle maintenance shops, laboratories, paint shops, offices, warehouses, living quarters, dining facilities, pipelines, and electrical power transmission lines.

(n) For hazardous debris, a description of the debris category(ies) and containment category(ies) to be treated, stored, or disposed at the facility.

Hazardous debris, as defined in 40 CFR 268.2, will not be treated or disposed. Examples of hazardous debris that have been generated at the Prudhoe Bay facility in the past and stored in the HWPF, and may be stored in the future, include personal protective equipment (PPE), piping and tools contaminated with listed hazardous waste. Offsite shipments of hazardous debris are accompanied by applicable land disposal restriction documentation for management, treatment and disposal in accordance with treatment standards in 40 CFR 268.40 or alternative treatment standards in 40 CFR 268.45.

<p>SEND COMPLETED FORM TO: The Appropriate State or EPA Regional Office.</p>	<p>United States Environmental Protection Agency</p> <p>RCRA SUBTITLE C SITE IDENTIFICATION FORM</p>		
<p>1. Reason for Submittal (See instructions on page 13.)</p> <p>MARK ALL BOX(ES) THAT APPLY</p>	<p>Reason for Submittal:</p> <p><input type="checkbox"/> To provide Initial Notification of Regulated Waste Activity (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities)</p> <p><input checked="" type="checkbox"/> To provide Subsequent Notification of Regulated Waste Activity (to update site identification information)</p> <p><input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application</p> <p><input checked="" type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____)</p> <p><input type="checkbox"/> As a component of the Hazardous Waste Report</p>		
<p>2. Site EPA ID Number (page 14)</p>	<p>EPA ID Number</p> <p style="text-align: center;"> A K D 0 0 0 6 4 3 2 3 9 </p>		
<p>3. Site Name (page 14)</p>	<p>Name: BP Exploration (Alaska) Inc. - Prudhoe Bay</p>		
<p>4. Site Location Information (page 14)</p>	<p>Street Address: Prudhoe Bay Unit</p>		
	<p>City, Town, or Village: Prudhoe Bay</p>	<p>State: AK</p>	
	<p>County Name: North Slope Borough</p>	<p>Zip Code: 99734</p>	
<p>5. Site Land Type (page 14)</p>	<p>Site Land Type: <input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input checked="" type="checkbox"/> State <input type="checkbox"/> Other</p>		
<p>6. North American Industry Classification System (NAICS) Code(s) for the Site (page 14)</p>	<p>A.</p> <p style="text-align: center;"> 2 1 1 1 1 1 </p>	<p>B.</p> <p style="text-align: center;"> </p>	
	<p>C.</p> <p style="text-align: center;"> </p>	<p>D.</p> <p style="text-align: center;"> </p>	
<p>7. Site Mailing Address (page 15)</p>	<p>Street or P. O. Box: P. O Box 196612, 900 East Benson Blvd.</p>		
	<p>City, Town, or Village: Anchorage</p>		
	<p>State: AK</p>		
	<p>Country: United States</p>	<p>Zip Code: 99519-6612</p>	
<p>8. Site Contact Person (page 15)</p>	<p>First Name: Colleen</p>	<p>MI: D</p>	<p>Last Name: Burgh</p>
	<p>Phone Number: 907-564-5229 Extension:</p>		<p>Email address: colleen.burgh@bp.com</p>
<p>9. Operator and Legal Owner of the Site (pages 15 and 16)</p>	<p>A. Name of Site's Operator: BP Exploration (Alaska) Inc.</p>		<p>Date Became Operator (mm/dd/yyyy): 08/11/1980</p>
	<p>Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p>		
	<p>B. Name of Site's Legal Owner: State of Alaska, Department of Natural Resources</p>		<p>Date Became Owner (mm/dd/yyyy): 01/03/1959</p>
	<p>Owner Type: <input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input checked="" type="checkbox"/> State <input type="checkbox"/> Other</p>		

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9. Legal Owner (Continued) Address	Street or P. O. Box: 3700 Airport Way	
	City, Town, or Village: Fairbanks	
	State: AK	
	Country: United States	Zip Code: 99709

10. Type of Regulated Waste Activity
Mark "Yes" or "No" for all activities; complete any additional boxes as instructed. (See instructions on pages 17 to 20.)

A. Hazardous Waste Activities
Complete all parts for 1 through 6.

<p><input checked="" type="checkbox"/> <input type="checkbox"/> 1. Generator of Hazardous Waste If "Yes", choose only one of the following - a, b, or c.</p> <p><input checked="" type="checkbox"/> a. LQG: Greater than 1,000 kg/mo (2,200 lbs./mo.) of non-acute hazardous waste; or</p> <p><input type="checkbox"/> b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.) of non-acute hazardous waste; or</p> <p><input type="checkbox"/> c. CESQG: Less than 100 kg/mo (220 lbs./mo.) of non-acute hazardous waste</p> <p>In addition, indicate other generator activities.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> d. United States Importer of Hazardous Waste</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> e. Mixed Waste (hazardous and radioactive) Generator</p>	<p><input type="checkbox"/> <input checked="" type="checkbox"/> 2. Transporter of Hazardous Waste</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> 3. Treater, Storer, or Disposer of Hazardous Waste (at your site) Note: A hazardous waste permit is required for this activity.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> 4. Recycler of Hazardous Waste (at your site)</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> 5. Exempt Boiler and/or Industrial Furnace If "Yes", mark each that applies.</p> <p><input type="checkbox"/> a. Small Quantity On-site Burner Exemption</p> <p><input type="checkbox"/> b. Smelting, Melting, and Refining</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> 6. Underground Injection Control</p>
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B. Universal Waste Activities

1. **Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste that apply:**

	<u>Manage</u>
a. Batteries	<input checked="" type="checkbox"/>
b. Pesticides	<input checked="" type="checkbox"/>
c. Mercury containing equipment	<input checked="" type="checkbox"/>
d. Lamps	<input checked="" type="checkbox"/>
e. Other (specify)	<input type="checkbox"/>
f. Other (specify) _____	<input type="checkbox"/>
g. Other (specify) _____	<input type="checkbox"/>

2. **Destination Facility for Universal Waste**
Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities
Mark all boxes that apply.

1. **Used Oil Transporter**
If "Yes", mark each that applies.

a. Transporter

b. Transfer Facility

2. **Used Oil Processor and/or Re-refiner**
If "Yes", mark each that applies.

a. Processor

b. Re-refiner

3. **Off-Specification Used Oil Burner**

4. **Used Oil Fuel Marketer**
If "Yes", mark each that applies.

a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner

b. Marketer Who First Claims the Used Oil Meets the Specifications

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11. Description of Hazardous Wastes (See instructions on page 21.)

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

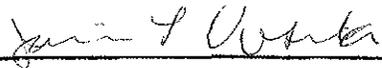
D001	D002	D003	D004	D005	D006	D007
D008	D009	D010	D011	D017	D018	D019
D020	D021	D022	D023	D024	D025	D026

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed for waste codes.

12. Comments (See instructions on page 21.)

11.A. Please see attached page for additional waste codes

13. Certification. 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, the information submitted is, to the best of my knowledge and belief, 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. For the RCRA Hazardous Waste Part A Permit Application, all operator(s) and owner(s) must sign (see 40 CFR 270.10 (b) and 270.11). (See instructions on page 21.)

Signature of operator, owner, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
	Janice L. Vosika, BPXA Greater Prudhoe Bay Field Manager	07/20/2009
 "as land owner only"	Chris Milles, Regional Manager, Northern Regional Office Alaska Dept. of Natural Resources, Div. of Mining, Land and Water	07/16/2009

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**BP Exploration (Alaska) Inc.
Prudhoe Bay Unit
EPA ID AKD000634239**

ATTACHMENT 1

RCRA Subtitle C Site Identification Form (cont.)

11.A. Waste Codes for Federally Regulated Hazardous Wastes. (cont.)

D027	D028	D029	D030	D031	D032	D033	D034	D035	D036	D037	D038
D039	D040	D041	D042	D043	F001	F002	F003	F004	F005	F027	F037
K050	K052	P001	P030	P042	P081	P088	P098	P105	P106	U002	U003
U031	U027	U037	U044	U056	U075	U080	U112	U114	U117	U120	U121
U122	U124	U126	U134	U136	U144	U151	U154	U159	U161	U165	U188
U196	U208	U210	U211	U213	U220	U226	U228	U239	U359		

United States Environmental Protection Agency
HAZARDOUS WASTE PERMIT INFORMATION FORM

1. Facility Permit Contact (See instructions on page 23)	First Name: Colleen	MI: D	Last Name: Burgh
	Phone Number: (907) 564-5229		Phone Number Extension:
2. Facility Permit Contact Mailing Address (See instructions on page 23)	Street or P.O. Box: P.C. Box 196612		
	City, Town, or Village: Anchorage		
	State: AK		
	Country: United States	Zip Code: 99519	
3. Operator Mailing Address and Telephone Number (See instructions on page 23)	Street or P.O. Box: P.O. Box 196612		
	City, Town, or Village: Anchorage		
	State: AK		
	Country: Unites States	Zip Code: 99519	Phone Number (907) 564-5229
4. Legal Owner Mailing Address and Telephone Number (See instructions on page 23)	Street or P.O. Box: State of Alaska, Dept. of Natural Resources, 3700 Airport Way		
	City, Town, or Village: Fairbanks		
	State: AK		
	Country: United States	Zip Code: 99709	Phone Number (907) 451-2740
5. Facility Existence Date (See instructions on page 24)	Facility Existence Date (mm/dd/yyyy): 08/11/1980		
6. Other Environmental Permits (See instructions on page 24)			
A. Permit Type (Enter code)	B. Permit Number	C. Description	
R		RCRA (please see attached Table 1-1 for	
U		UIC/SDWA listing of existing permits and permit	
N		NPDES/CWA applications as of May 2009)	
P		PSD/CAA	
E		OTHER RELEVANT PERMITS: EPA, ADEC, ADNR, USACE, NSB	
7. Nature of Business (Provide a brief description; see instructions on page 24)			
Crude oil petroleum and natural gas exploration, development and production. SIC = 1311			

8. Process Codes and Design Capacities (See instructions on page 24) - Enter information in the Sections on Form Page 3.

A. PROCESS CODE - Enter the code from the list of process codes in the table below that best describes each process to be used at the facility. Fifteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), enter the process information in Item 9 (including a description).

B. PROCESS DESIGN CAPACITY- For each code entered in Section A, enter the capacity of the process.

- 1. AMOUNT** - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.
- 2. UNIT OF MEASURE** - For each amount entered in Section B(1), enter the code in Section B(2) from the list of unit of measure codes below that describes the unit of measure used. Select only from the units of measure in this list.

C. PROCESS TOTAL NUMBER OF UNITS - Enter the total number of units for each corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
	<u>Disposal:</u>			<u>Treatment (continued):</u>	
D79	Underground Injection Well Disposal	Gallons; Liters; Gallons Per Day; or Liters Per Day	T81	Cement Kiln	For T81-T93:
D80	Landfill	Acre-feet; Hectare-meter; Acres; Cubic Meters; Hectares; Cubic Yards	T82	Lime Kiln	
D81	Land Treatment	Acres or Hectares	T83	Aggregate Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour
D82	Ocean Disposal	Gallons Per Day or Liters Per Day	T84	Phosphate Kiln	
D83	Surface Impoundment Disposal	Gallons; Liters; Cubic Meters; or Cubic Yards	T85	Coke Oven	
D99	Other Disposal	Any Unit of Measure in Code Table Below	T86	Blast Furnace	
	<u>Storage:</u>		T87	Smelting, Melting, or Refining Furnace	Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S01	Container	Gallons; Liters; Cubic Meters; or Cubic Yards	T88	Titanium Dioxide Chloride Oxidation Reactor	
S02	Tank Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T89	Methane Reforming Furnace	
S03	Waste Pile	Cubic Yards or Cubic Meters	T90	Pulping Liquor Recovery Furnace	
S04	Surface Impoundment Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T91	Combustion Device Used In The Recovery Of Sulfur Values From Spent Sulfuric Acid	
S05	Drip Pad	Gallons; Liters; Acres; Cubic Meters; Hectares; or Cubic Yards	T92	Halogen Acid Furnaces	
S06	Containment Building Storage	Cubic Yards or Cubic Meters	T93	Other Industrial Furnaces Listed In 40 CFR §260.10	
S99	Other Storage	Any Unit of Measure in Code Table Below	T94	Containment Building - Treatment	Cubic Yards; Cubic Meters; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour
	<u>Treatment:</u>			<u>Miscellaneous (Subpart X):</u>	
T01	Tank Treatment	Gallons Per Day; Liters Per Day	X01	Open Burning/Open Detonation	Any Unit of Measure in Code Table Below
T02	Surface Impoundment Treatment	Gallons Per Day; Liters Per Day	X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; Kilograms Per Hour; Gallons Per Hour; Liters Per Hour; or Gallons Per Day
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour	X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Gallons Per Day; Liters Per Hour; or Million Btu Per Hour	X04	Geologic Repository	Cubic Yards; Cubic Meters; Acre-feet; Hectare-meter; Gallons; or Liters
T80	Boiler	Gallons; Liters; Gallons Per Hour; Liters Per Hour; Btu Per Hour; or Million Btu Per Hour	X99	Other Subpart X	Any Unit of Measure Listed Below

UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons.....	G
Gallons Per Hour.....	E
Gallons Per Day.....	U
Liters.....	L
Liters Per Hour.....	H
Liters Per Day.....	V

UNIT OF MEASURE	UNIT OF MEASURE CODE
Short Tons Per Hour.....	D
Metric Tons Per Hour.....	W
Short Tons Per Day.....	N
Metric Tons Per Day.....	S
Pounds Per Hour.....	J
Kilograms Per Hour.....	R
Million Btu Per Hour.....	X

UNIT OF MEASURE	UNIT OF MEASURE CODE
Cubic Yards.....	Y
Cubic Meters.....	C
Acres.....	B
Acre-feet.....	A
Hectares.....	Q
Hectare-meter.....	F
Btu Per Hour.....	I

10. Description of Hazardous Wastes (See instructions on page 25) - Enter information in the Sections on Form Page 5.

- A. EPA HAZARDOUS WASTE NUMBER** - Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR Part 261, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY** - For each listed waste entered in Section A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in Section A, estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE** - For each quantity entered in Section B, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure, taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in Section A, select the code(s) from the list of process codes contained in Items 8A and 9A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the listed hazardous wastes.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in Section A, select the code(s) from the list of process codes contained in Items 8A and 9A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. Enter the first two as described above.
2. Enter "000" in the extreme right box of Item 10.D(1).
3. Use additional sheet, enter line number from previous sheet, and enter additional code(s) in Item 10.E.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in Item 10.D(2) or in Item 10.E(2).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in Section A. On the same line complete Sections B, C and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In Section A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In Section D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING Item 10 (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operations. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES														
	(1) PROCESS CODES (Enter code)										(2) PROCESS DESCRIPTION- (If a code is not entered in D(1))										
X 1	K	0	5	4	900	P	T	0	3	D	8	0									
X 2	D	0	0	2	400	P	T	0	3	D	8	0									
X 3	D	0	0	1	100	P	T	0	3	D	8	0									
X 4	D	0	0	2																	Included With Above

10. Description of Hazardous Wastes (Continued. Use the Additional Sheet(s) as necessary; number pages as 5 a, etc.)

Line Number	A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES													
	(1) PROCESS CODES (Enter code)										(2) PROCESS DESCRIPTION (If a code is not entered in D(1))									
1	D	0	0	1	20,000	P	S	0	1											
2	D	0	0	2	10,000	P														
3	D	0	0	3	9,000	P														
4	D	0	0	4	650	P														
5	D	0	0	5	650	P														
6	D	0	0	6	600	P														
7	D	0	0	7	6,000	P														
8	D	0	0	8	10,000	P														
9	D	0	0	9	6,600	P														
1 0	D	0	1	0	650	P														
1 1	D	0	1	1	1,600	P														
1 2	D	0	1	7	10	P														
1 3	D	0	1	8	10,000	P														
1 4	D	0	1	9	10	P														
1 5	D	0	2	0	10	P														
1 6	D	0	2	1	100	P														
1 7	D	0	2	2	10	P														
1 8	D	0	2	3	10	P														
1 9	D	0	2	4	10	P														
2 0	D	0	2	5	10	P														
2 1	D	0	2	6	10	P														
2 2	D	0	2	7	10	P														
2 3	D	0	2	8	10	P														
2 4	D	0	2	9	10	P														
2 5	D	0	3	0	10	P														
2 6	D	0	3	1	10	P														
2 7	D	0	3	2	10	P														
2 8	D	0	3	3	10	P														
2 9	D	0	3	4	10	P														
3 0	D	0	3	5	10	P														
3 1	D	0	3	6	10	P														
3 2	D	0	3	7	10	P														
3 3	D	0	3	8	10	P														
3 4	D	0	3	9	500	P														
3 5	D	0	4	0	600	P														
3 6	D	0	4	1	10	P														
3 7	D	0	4	2	10	P														
3 8	D	0	4	3	100	P														
3 9	F	0	0	1	5,500	P														

10. Description of Hazardous Wastes (Continued. Use this Additional Sheet(s) as necessary; number as 5 a, etc.)

Line Number	A. EPA Hazardous Waste No. (Enter code)			B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES														
	(1) PROCESS CODES (Enter code)						(2) PROCESS DESCRIPTION (If a code is not entered in E(1))													
4 0	F	0	0	2	1,400	P	S	0	1											
4 1	F	0	0	3	1,600	P														
4 2	F	0	0	4	100	P														
4 3	F	0	0	5	1,400	P														
4 4	F	0	2	7	100	P														
4 5	F	0	3	7	100	P														
4 6	K	0	5	0	3,000	P														
4 7	K	0	5	2	100	P														
4 8	P	0	0	1	100	P														
4 9	P	0	3	0	100	P														
5 0	P	0	4	2	100	P														
5 1	P	0	8	1	30	P														
5 2	P	0	8	8	10	P														
5 3	P	0	9	8	200	P														
5 4	P	1	0	5	10	P														
5 5	P	1	0	6	10	P														
5 6	U	0	0	2	100	P														
5 7	U	0	0	3	10	P														
5 8	U	0	2	7	10	P														
5 9	U	0	3	1	10	P														
6 0	U	0	3	7	10	P														
6 1	U	0	4	4	10	P														
6 2	U	0	5	6	10	P														
6 3	U	0	7	5	10	P														
6 4	U	0	8	0	10	P														
6 5	U	1	1	2	10	P														
6 6	U	1	1	4	10	P														
6 7	U	1	1	7	10	P														
6 8	U	1	2	0	10	P														
6 9	U	1	2	1	10	P														
7 0	U	1	2	2	10	P														
7 1	U	1	2	4	10	P														
7 2	U	1	2	6	10	P														
7 3	U	1	3	4	10	P														
7 4	U	1	3	6	10	P														
7 5	U	1	4	4	10	P														
7 6	U	1	5	1	10	P														
7 7	U	1	5	4	3,000	P														
7 8	U	1	5	9	10	P														

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Table 1 - 1
Environmental Permits and Permit Applications
PART A Permit Application
Item 6: Other Environmental Permits

Permit Number	Agency	Project Name/Description
AQ0166TVP01	ADEC	CCP Title V Operating Permit
AQ0167TVP01	ADEC	FS1 Air Permit
AQ0168TVP01	ADEC	Air Quality Operating Permit for Grind and Inject Facility
169TVP01;Revision 1	ADEC	HWP Title V Permit
AQ0170TVP01	ADEC	SIPE Title V Permit
AQ0182TVP01;Revision 2	ADEC	GC1 Title V Permit
AQ0183TVP01	ADEC	GC2 Title V Permit
AQ0184TVP01	ADEC	GC3 Title V Permit
AQ0186TVP01	ADEC	CPS Air Permits
AQ0188TVP01	ADEC	BOC Title V Permit
AQ0265TVP01	ADEC	COTU Title V Application
AQ0268TVP01	ADEC	FS2 Title V Permit
AQ0269TVP01	ADEC	FS3 Air Permit
AQ0270TVP01	ADEC	CGF Air Permit
AQ0271TVP01	ADEC	STP Air Permit
AQ0272TVP01; Revision 2	ADEC	LPC Title V Permit
AQ0274TVP01	ADEC	PBOC/MCC Title V Permit
AQ0455TVP01;Revision 2	ADEC	Five Transportable Drilling Rigs Title V Permit
AQ0270CPT04A	ADEC	Sulphur Limits for CGF
AQ0170CPT01A	ADEC	SIPE PSD Application
AQ0183MSS01	ADEC	GC2 Minor Permit
AQ0269MSS01	ADEC	FS3 Minor Permit
AQ0274MSS01	ADEC	PBOC/MCC Tarmac Emergency Generator Project
AQ188TVP02A	ADEC	BOC Title V Renewal Application
AQ1207MSS01A	ADEC	Transportable Drill Rig Camps Minor Title I
AQ0166MSS02A	ADEC	CCP ORL with MSS
AQ0270TVP02A	ADEC	CGF Title V Renewal Application
AQ0265TVP02A	ADEC	COTU Title V Renewal Application
AQ0167TVP02A	ADEC	FS-1 Title V Renewal Application
AQ0268MSS01A	ADEC	FS-2 Revise and Rescind HS2 Limits
AQ0166TVP02A	ADEC	CCP Title V Renewal Application
AQ0268TVP02A	ADEC	FS-2 Title V Renewal Application
AQ0269TVP02A	ADEC	FS-3 Title V Renewal Application
AQ0182MSS01A	ADEC	GC-1 Revise Enforceable H2S Limits
AQ0182TVP02A	ADEC	GC-1 Title V Renewal Application
AQ0183MSS02A	ADEC	GC-2 Revise Enforceable H2S Limits
AQ0183TVP02A	ADEC	GC-2 Title V Renewal Application
AQ0184MSS01A	ADEC	GC-3 Revise Enforceable H2S Limits
AQ0184TVP02A	ADEC	GC-3 Title V Renewal Application
AQ0168TVP02A	ADEC	G&IF Title V Renewal Application
AQ0272TVP02A	ADEC	LPC Title V Renewal Application
AQ0186TVP02A	ADEC	CPS Title V Renewal Application
AQ0186MSS01A	ADEC	CPS Revise Enforceable H2S Limits
AQ0274TVP02A	ADEC	PBOC/MCC Title V Renewal Application
AQ0170TVP01P, Rev. 2	ADEC	SIPE Adm Amendment

**Table 1 - 1
Environmental Permits and Permit Applications
PART A Permit Application
Item 6: Other Environmental Permits**

Permit Number	Agency	Project Name/Description
AQ0170TVP02A	ADEC	SIPE Title V Renewal Application
AQ0271TVP02A	ADEC	STP Title V Renewal Application
AQ0271MSS01	ADEC	STP ORL to Avoid Minor Permit under 502(c)
AQ0455TVP02A	ADEC	Drilling Rigs Title V Renewal Application
AK11004A	EPA	Pad 3 Class I UIC Wells
AK11008A	EPA	G&I Class I UIC Wells
2005DB001 - 0012	ADEC	G&I Wastewater Disposal Permit
Aquifer Exemption Order 1	AOGCC	Aquifer Exemption Order Number 1 - WOA including K Pad area
SWXA02413	ADEC	Solid Waste Permit for Grind & Inject
SWGDRILL01 for SWGPDRILL13	ADEC	CC2A Waste Storage Facility
SWGDRILL03 for SWGPDRILL13	ADEC	T Pad Waste Storage Cell
SWGDRILL04 for SWGPDRILL13	ADEC	W Pad Solid Waste Storage Cell
Area Injection Order 3	AOGCC	WOA Class II Injection, EOR and Disposal
Area Injection Order 4E	AOGCC	EOA Class II Injection, EOR and Disposal
9536BA004	ADEC	ADEC Pad-3 Solid Waste Disposal Permit
AKD000643239	EPA	Prudhoe Bay Large Quantity Generator
AK0029840	EPA	NPDES Permit for STP Discharge. This permit was Administratively Extended by EPA per 3/9/05 letter. Renewal submitted 11/29/04. BPXA is awaiting new permit.
AKG330032	EPA	NPDES NOI for Put 23 Gravel Mine Gravel Pit Dewatering
AKG330061	EPA	NPDES NOI for GPB Stormwater Discharge
AKG570005	EPA	CSTF Domestic Wastewater Treatment Permit. Program now administered by ADEC (APDES) per 2/28/08 letter. Permit will not be issued under EPA
AKG570006;Modification Issued 8/29/2005	EPA	PBOC Domestic Wastewater Treatment Permit. Program now administered by ADEC (APDES) per 2/18/08 letter. Permit will not be issued under EPA
FRPAKA0042	EPA	ODPCP -Greater Prudhoe Bay Facility Response Plan
M19790438	USACE	Kuparuk River Flood Repairs
M800454	USACE	Put 23 Gravel Mine Site
POA1979107M	USACE	C Pad Solid Waste Facility Cleanup
POA1979114M2	USACE	X Pad VSM Replacement
POA1979291OO	USACE	West Dock Causeway Maintenance Dredging
POA1979291M32	USACE	STP Winter Maintenance Dredging
POA1979353M1	USACE	West End Nomination Pad Abandonment and Reserve Pit Closure
POA1979431M7	USACE	FS3 Flare Replacement
POA1979465M3	USACE	DS11 Water Injection Supply Line
POA19800040M1	USACE	MCC Pad Expansion for Future Living Quarters Building
POA1982320O	USACE	DS01 Transformer Platform Expansion Project
POA1983230NWP12	USACE	VSM Repair/Replacement LPC to DSL3
POA1984010O	USACE	Kuparuk Deadarm Gravel Mining
POA1984198M14	USACE	LGI Reserve Pit Backfill
POA1984198X	USACE	Drill Site Lisburne 1 Reserve Pit Stabilization
POA1984454O	USACE	Put 23 Gravel Mine Site
POA198565V	USACE	W Pad Source Water Wells and Pad Expansion

Table 1 - 1
Environmental Permits and Permit Applications
PART A Permit Application
Item 6: Other Environmental Permits

Permit Number	Agency	Project Name/Description
POA198565W	USACE	WOA W Pad Source Water Wells Infrastructure
POA198566M12	USACE	Z Pad Expansion VSMS
POA1987202M7	USACE	Pad 3 FRPs Remediation Management Project
POA1987277M1	USACE	Sag Mine Site C Ramp Extension
POA200041M7	USACE	V Pad Expansion for Wells
POA2002294DNWP13;dated 9/9/2004	USACE	Kuparuk River East Channel Stream Barbs
POA20051449	USACE	69 kV Power Line and Z Pad Expansion Project
POA20061723X	USACE	OT28 15kV Power Distribution FS-3 to Skid 50
POA20061723Z	USACE	OTL Mods FS3 VSMS and Gravel
POA2006665DNWP20	USACE	Gathering Center 2 Transit Line Spill Site Rehabilitation and Erosion Control Plan
POA2006942	USACE	CIC/DSM Pad Expansion for Safe Parking and Fire Lane
POA2007684DNWP20	USACE	Drill Site 5 Access Road Tanker Rollover Diesel Spill
POA2007890	USACE	CIC/DSM Pad Expansion for Safe Parking and Fire Lane
POA2007890M1	USACE	CIC/DSM South Expansion 2008
POA20081559	USACE	PBU Buried Powerline Road Crossings (2008)
POA20081623	USACE	Pad 37 Pad Abandonment and Reserve Pit Closure
POA200917	USACE	PBU Buried Powerline Road Crossings (2008)
POA2009177NWP18	USACE	Artificial Gas Lift Make Piggable
POA2009178NWP18	USACE	Artificial Gas Lift Make Piggable
POA1974221AA	USACE	West Dock Causeway Erosion Control and Maintenance
LONS8174 dated 9/26/2006	ADNR	Annex 1 Camp Dismantlement and Replacement
LONS8266 dated 8/17/2007	ADNR	West Dock Security Station Installation
LONS8273 dated 3/9/2007	ADNR	X Pad VSM Replacement
LONS8347 dated 2/23/2006	ADNR	S Pad Source Water Wells
LONS84062 dated 10/29/2008	ADNR	LGI Reserve Pit Backfill
LONS85008 dated 10/9/2006	ADNR	W Pad Source Water Wells and Pad Expansion
LONS85008 dated 9/4/2007	ADNR	WOA W Pad Source Water Wells Infrastructure
LONS8509 dated 6/21/2005	ADNR	Z Pad Expansion
LONS8509 dated 10/9/2006	ADNR	Z Pad Source Water Wells
LONS8509 dated 2/27/2007	ADNR	Z Pad Early Heat
LONS8509 dated 4/21/2009	ADNR	Z Pad Expansion VSMS
LONS85042 dated 4/13/2009	ADNR	CGF EMD Controls Upgrade (Revision)
LONS87012 dated 8/14/2008	ADNR	Sag Mine Site C Ramp Extension
LONS8820 dated 5/15/2002	ADNR	W Pad Seasonal Drilling Waste Fluids Storage
LONS8960 dated 12/2/2008	ADNR	Pad 3 Light Poles Installation
LONS8960 dated 3/10/2009	ADNR	Pad 3 FRPs Remediation Management Project
LONS8960 dated 8/8/2008	ADNR	PBU DS6 Pad 3 Secondary Containment
LONS9012 dated 2/19/2003	ADNR	Put 27 pad fence installation
LONS9027 dated 2/8/2008	ADNR	PBOC/MCC Dumbwaiter Installations
LONS9027 dated 6/11/2008	ADNR	MCC Office Trailers and Power Installation
LONS9027 dated 6/27/2008	ADNR	MCC Pad Expansion for Future Living Quarters Building
LONS9086 dated 6/23/2000	ADNR	T Pad Permanent/Temporary Materials Storage
LONS9086 dated 6/26/1990	ADNR	T Pad Permanent/Temporary Materials Storage
N19790449	USACE	Kuparuk River Flood Repairs
N19800454	USACE	Put 23 Gravel Mine Site
NSB00153	NSB	Pool 7 Storage, West Dock Staging Area
NSB01001	NSB	Material storage at T-pad
NSB01094	NSB	West End pipelines, powerlines and power from L to Z Pad

Table 1 - 1
Environmental Permits and Permit Applications
PART A Permit Application
Item 6: Other Environmental Permits

Permit Number	Agency	Project Name/Description
NSB02262A	NSB	W Pad Seasonal Drilling Waste Fluids Storage
NSB04007	NSB	Road Culverts
NSB04040	NSB	V Pad Expansion and VSM Installation
NSB04157	NSB	PBU L, V, W, Z and S Pad Thermo-siphon Installations
NSB05056	NSB	PBU L and V Pads Instrumentation and Electrical Infrastructure Upgrades, L Pad
NSB05059	NSB	Pad 3 East Pit Reconstruction
NSB05217	NSB	West Dock Causeway Erosion Control and Maintenance
NSB05220	NSB	Z Pad Expansion (2005)
NSB06015	NSB	Buried Containment at Hot Water Plant
NSB06034	NSB	CGF Flare Pilot Monitoring System
NSB06083	NSB	East Dock Secondary Containment Structure and Generator
NSB06084	NSB	Hot Water Plant Buried Containment
NSB06118	NSB	S Pad Source Water Wells
NSB06165	NSB	PBOC Equipment Services Storage Area Light Pole and Buried Cable
NSB06213;Amendment dated 5/12/2006	NSB	Gathering Center 2 Transit Line Spill Site Rehabilitation and Erosion Control Plan
NSB06225	NSB	East Dock Land Farming
NSB06239	NSB	CIC/DSM Pad Expansion for Safe Parking and Fire Lane
NSB06256	NSB	West Dock Causeway Erosion Control and Maintenance
NSB07058	NSB	GPB Oil Transit Line Bypass
NSB07060	NSB	GPB Oil Transit Line Bypass
NSB07069	NSB	Annex 1 Structures to Fire Training Grounds
NSB07085	NSB	Annex 1 Camp Dismantlement and Replacement
NSB07106	NSB	W Pad Source Water Wells and Pad Expansion
NSB07107	NSB	Z Pad Source Water Wells
NSB07179	NSB	Kuparuk Deadarm Mine Site Cross-Tie Trench
NSB07205	NSB	PBOC Airstrip Pipe Storage and Staging Area
NSB07234	NSB	Annex 1 Pipe Storage and Cleaning Area
NSB07340	NSB	CIC/DSM Pad Expansion for Safe Parking and Fire Lane
NSB07345	NSB	PBU PM1 Pad Thermo-siphon Installations
NSB07346	NSB	Drill Site Maintenance Pad Storage Tent
NSB07348	NSB	Oil Transit Pipeline Bypass Flow Station 2 Access Platforms
NSB07374	NSB	DSL-2 20' Jumper Line
NSB08010	NSB	CIC Staircase and Bollards Installation
NSB08043	NSB	WOA W Pad Source Water Wells Infrastructure
NSB08057	NSB	PBU STP Diesel Storage Tank
NSB08198	NSB	PBU DS 01 VSMs 2008
NSB08210	NSB	PBU DS 16 VSMs 2008
NSB08214	NSB	Bus Barn Bull Rail Installation
NSB08217	NSB	NGI VSM Replacement
NSB08221	NSB	PBOC/MCC Dumbwaiter Installations
NSB08222	NSB	PBOC/MCC Dumbwaiter Installations
NSB08264	NSB	Mobil-Kuparuk 9-11-12 Rig Camp
NSB08325f	NSB	MCC Pad Expansion for Future Living Quarters Building
NSB08340	NSB	FS3 Flare Replacement
NSB08341	NSB	DS11 VSM Repair
NSB08347	NSB	Hot Water Plant Tank Installation
NSB08368	NSB	BOC HWPf Gravel Addition 2008
NSB08370	NSB	MCC Office Trailers and Power Installation
NSB08382	NSB	STP Containment Area for STP Sediment Dewatering

Table 1 - 1
Environmental Permits and Permit Applications
PART A Permit Application
Item 6: Other Environmental Permits

Permit Number	Agency	Project Name/Description
NSB08383	NSB	West Dock 2008 Routine Maintenance Projects
NSB09011	NSB	PBU Thermosyphon Installation PM2
NSB09018	NSB	CIC/DSM South Expansion
NSB09046	NSB	PBU DS6 Pad 3 Secondary Containment
NSB09054	NSB	Annex 1 Camp Dismantlement and Replacement
NSB09096	NSB	BOC Temporary Camp for Fire/Sprinkler Upgrade Project
NSB09100	NSB	FS1 to LPC Fiber Optic Cable Installation
NSB09139	NSB	LGI Reserve Pit Backfill
NSB09153	NSB	DSL1 Fiber Optic Cable Installation
NSB09156	NSB	GPB Sag River Bridge Power Cable Relocation and Replacement
NSB09157	NSB	DSL2 Fiber Optic Cable Installation
NSB09165	NSB	OT18 Gravel Addition at FS1
NSB09178	NSB	Pad 3 Light Poles Installation
NSB09180	NSB	DSL3 Lake Ice Road
NSB09181	NSB	Sag River Bridge Ice Road
NSB09182	NSB	Sag River Ice Road
NSB09183	NSB	API Valve Shop Office Addition
NSB09193	NSB	PBU Pipeline Inspections
NSB09197	NSB	PBU Buried Powerline Road Crossings (2008)
NSB09199	NSB	PBU Pipeline Inspections
NSB09200	NSB	PBU Pipeline Inspections
NSB09201	NSB	PBU Pipeline Inspections
NSB09202	NSB	PBU Pipeline Inspections
NSB09203	NSB	PBU Pipeline Inspections
NSB09204	NSB	PBU Pipeline Inspections
NSB09205	NSB	PBU Pipeline Inspections
NSB09209	NSB	Pad 37 Pad Abandonment and Reserve Pit Closure
NSB09210	NSB	West End Nomination Pad Abandonment and Reserve Pit Closure
NSB09226	NSB	Skid 50 Snow Pad
NSB09232	NSB	DS-12 Lake Colleen Ice Road
NSB09255	NSB	FS2 Envirovac
NSB09263	NSB	FS1 Envirovac Installations
NSB09276	NSB	H Pad Flare Line Heat Trace System Upgrade
NSB09277	NSB	N Pad Flare Line Heat Trace System Update
NSB09278	NSB	R Pad Flare Line Heat Trace System Update
NSB09281	NSB	X Pad VSM Replacement
NSB09282	NSB	R pad VSMs for Replacement Well
NSB09303	NSB	FS1 Pilings for Platform
NSB09312	NSB	Connexes at GPB CIC/DSM
NSB09317	NSB	Pad 3 FRPs Remediation Management Project
NSB09321	NSB	DS4 ice Pad
NSB09322	NSB	PBU Skid 50 to CCP Pipeline Inspection
NSB09329	NSB	GC2 Flare Liquids Removal
NSB09331	NSB	Artificial Las Line Make Piggable
NSB09332	NSB	Artificial Las Line Make Piggable
NSB09333	NSB	Artificial Las Line Make Piggable
NSB09334	NSB	Artificial Las Line Make Piggable
NSB09335	NSB	Artificial Las Line Make Piggable
NSB09360	NSB	PBU DS1 Transformer Platform Project

Table 1 - 1
Environmental Permits and Permit Applications
PART A Permit Application
Item 6: Other Environmental Permits

Permit Number	Agency	Project Name/Description
NSB09392	NSB	GC3 snow enclosures and VSMS
NSB09394	NSB	CGF EMD Controls Upgrade (Revision)
NSB09397	NSB	E & K Pad Power Cable Repair (Revised)
NSB09404	NSB	DS-14 Crew Shack Cable Install
NSB09405	NSB	Z Pad Expansion VSMS
<p>Note: Some types of permits (e.g., open but inactive Corps of Engineers permits, State of Alaska DNR land use permits, water withdrawal permits, stream crossing permits) are not listed due to volume. The status of permits, authorizations and applications for the Prudhoe Bay Unit is dynamic. The above listing was from a 5/8/09 BPXA database query. All permits and authorizations are currently available electronically via the BPXA HSEMS Compliance Manager and Compliance Task Manager systems.</p>		

Section 2

Community Meeting Summary [40 CFR 270.275 (b)]

**BP Exploration (Alaska) Inc.
Prudhoe Bay Unit
RCRA ID AKD000643239**

Hazardous Waste Standardized Permit Application

**Section 2 - Community Meeting Summary
[40 CFR 270.265 (b)]**

In accordance with 40 CFR 270.265(b) and 40 CFR 124.31, BPXA conducted a pre-application public meeting prior to submittal of the Standardized Permit Notice of Intent and application. The meeting was conducted to solicit questions from the community and inform the community of the proposed hazardous waste management activities at the Prudhoe Bay facility and specifically at the HWPF, and the standardized permit application to EPA.

At the recommendation of the North Slope Borough (NSB), the local government for communities near the Prudhoe Bay facility, the public meeting was the regularly scheduled November 20, 2008 meeting of the NSB Planning Commission in Barrow, Alaska. The NSB Planning Commission consists of representatives from Anaktuvak Pass, Atqasuk, Barrow, Kaktovik, Nuiqsut, Pt. Hope, Pt. Lay, and Wainwright.

Prior to the meeting, public notices were completed that contained the following information required in 40 CFR 124.31(d):

- (i) Date, time, and location of the meeting
- (ii) A brief description of the purpose of the meeting
- (iii) A brief description of the facility and proposed operations, including the address or a map (e.g., a sketched or copied street map) of the facility location
- (iv) Statement encouraging people to contact the facility at least 72 hours before the meeting if they need special access to participate in the meeting, and
- (v) The name, address, and telephone number of a contact person for the applicant.

The public notices were completed in the following formats, in accordance with 40 CFR 124.31(c):

- (i) A newspaper advertisement, which included the information in 124.31(d)(2), was published as a display ad in The Arctic Sounder weekly newspaper on October 16, 2008. A copy of the display ad is included in Attachment 2-1. The Arctic Sounder publication

serves the Northwest Arctic and North Slope regions of Alaska and is distributed among the communities in those regions, as well as online at <http://www.thearcticsouder.com>.

(ii) The display ad was produced as a large laminated sign and posted at the two public entrances to the Prudhoe Bay facility, the East and Central Checkpoints, and at the HWPF building entrance.

(iii) A broadcast media announcement, which contained the information from the public notice, was aired as a public service announcement during the week of November 20 on the local KBRW AM and FM radio stations.

(iv) A copy of the display ad was sent to EPA Region 10 RCRA permitter Roberta Hedeem via email on October 13, 2008. Notices were also sent via email to the Alaska Department of Environmental Conservation (ADEC) and the Alaska Department of Natural Resources. In addition, BPXA conducted an informal meeting with ADEC staff in Anchorage, Alaska on November 17 to inform them of the proposed hazardous waste activities and permit application.

BPXA completed a presentation on hazardous waste management within the Prudhoe Bay facility and the proposed standardized permit for the HWPF during the November 20, 2008 meeting of the NSB Borough Planning Commission. The BPXA presentation was one of several agenda items for the meeting. A sign-up sheet, which includes names and addresses of meeting attendees, was completed at the meeting and is included in Attachment 2-2. Meeting attendees included NSB staff, NSB Planning Commission members, presenters for other agenda items during the meeting, and members of the general public. NSB Planning Commission members attended in person and via teleconference. Following BPXA's presentation, there were no questions or comments from the NSB Planning Commission members, staff, or the public, and no written comments or materials were submitted at the meeting.

ATTACHMENT 2-1

Public Meeting Notice

**BP Exploration Alaska, Inc.
Notice of Intent: EPA Standardized Permit
for Hazardous Waste Storage
at Prudhoe Bay, Alaska**

BP will present an update on its permit application to the U.S. Environmental Protection Agency to continue temporary storage of hazardous waste at the existing Hazardous Waste Process Facility located in the Prudhoe Bay oil field, approximately 200 miles east of Barrow. The storage facility is used to temporarily store hazardous waste that is generated during normal oil and gas production activities before it is shipped out of Alaska for treatment or disposal (for example, paints and cleaning solvents). The public is invited to participate in the meeting and provide comments or questions about the permit application and the storage facility.

**North Slope Borough Planning Commission meeting
Thursday, November 20, 2008
9:30 a.m.**

**North Slope Borough Administration Building
Assembly Chambers**

Persons requiring special access to participate in the meeting are encouraged to contact BP at least 72 hours prior to the meeting. For special access request or additional information regarding BP's permit application please contact:

Cindy Bailey
Director, Regional Government and Community Affairs
BP Exploration Alaska, Inc.
P.O. Box 196612 Anchorage, AK 99519
Phone: 907-564-5537



ATTACHMENT 2-2

**North Slope Borough (NSB) Planning Commission Meeting
NSB Assembly Chambers
Barrow, Alaska 99723
November 20, 2008**

List of attendees for the BPXA presentation on a proposed RCRA Standardized Permit for the Prudhoe Bay Unit Hazardous Waste Process Facility

NSB Planning Commissioners:

Lucille Mayer
P. O. Box 55
Wainwright, AK 99782

Eli Nukapigak
P. O. Box 229
Nuiqsut, AK 99789

Hazel F. Pebley
P. O. Box 1087
Barrow, AK 99723

Nora Jane Burns
General Delivery
Kaktovik, AK 99747

Jerry Sikvayugak (via teleconference)
P. O. Box 21033
Anaktuvuk Pass, AK 99721

Bill Tracy (via teleconference)
P. O. Box 59029
Pt. Lay, AK 99759

Ray Koonuk Sr. (via teleconference)
P. O. Box 52
Pt. Hope, AK 99766

(continued)

ATTACHMENT 2-2 (continued)
List of Attendees

NSB Planning staff and public:

Adeline Hopson
P. O. Box 172
Barrow, AK 99723

Rhoda Ahmaogak, NSB Planning Dept.
P. O. Box 69
Barrow, AK 99723

Ben Greene, NSB Planning Staff
P. O. Box 69
Barrow, AK 99723

Bob Harcharek, CIP Planner
NSB Public Works
P. O. Box 69
Barrow, AK 99723

Doreen Lampe, NSB Planning
Administrator
P. O. Box 69
Barrow, AK 99723

Barrett Ristrophe, NSB Law Dept
P. O. Box 69
Barrow, AK 99723

Gordon Brower, NSB Planning Dept
P. O. Box 69
Barrow, AK 99723

Charles F Hopson, LCMF/self
P. O. Box 955
Barrow, AK 99723

Johnny Aiken, NSB Planning Director
P. O. Box 69
Barrow, AK 99723

Waska Williams, Jr., NSB
Planning/Permits
P. O. Box 69
Barrow, AK 99723

Wesley Aiken, Elder
P. O. Box 374
Barrow, AK 99723

Tricia Waggoner, Denali Pipeline Project
Lisa Pekich, Denali Pipeline Project
(Ms. Waggoner and Ms. Pekich were
present primarily due to their update of the
Denali Pipeline Project earlier in the
meeting)

George Olemaun, Special Asst. to NSB
Mayor
P. O. Box 69
Barrow AK 99723

Section 3

Compliance with Location Standards [40 CFR 270.275 (c)]

**BP Exploration (Alaska) Inc.
Prudhoe Bay Unit
RCRA ID AKD000643239**

Hazardous Waste Standardized Permit Application

**Section 3 - Location Standards
[40 CFR 270.275 (c)]**

This section provides documentation of compliance with the location standards of 40 CFR 267.18 and 270.14(b)(11), which apply to the siting of hazardous waste facilities located in areas of seismic activity or areas within a 100-year floodplain. Additionally, State of Alaska hazardous waste facility siting requirements are addressed.

State of Alaska Siting Requirements [18 AAC 63]

State standards for siting of hazardous waste management facilities are in ADEC regulations 18 AAC 63.

According to 18 AAC 63.010(b), ADEC siting approval is not required for a facility that, as of March 31, 1989, is in compliance with the RCRA interim standards provided in 40 CFR Part 265.

Seismic Standard [40 CFR 267.18(a) and 270.14(b)(11)(ii)]

The political jurisdiction in which the facility is located is the North Slope Borough of Alaska. The facility is exempt from the seismic standard [40 CFR 267.18(a)] because the North Slope Borough is not included in Appendix VI of 40 CFR 264, which lists political jurisdictions in which compliance with 267.18(a) must be demonstrated. Similarly, 270.14(b)(11)(ii), demonstration of compliance with the seismic standard is only required for those facilities located in an area listed in Appendix VI of 40 CFR 264.

Floodplain Standard [40 CFR 267.18(b) and 270.14(b)(11)(iii)]

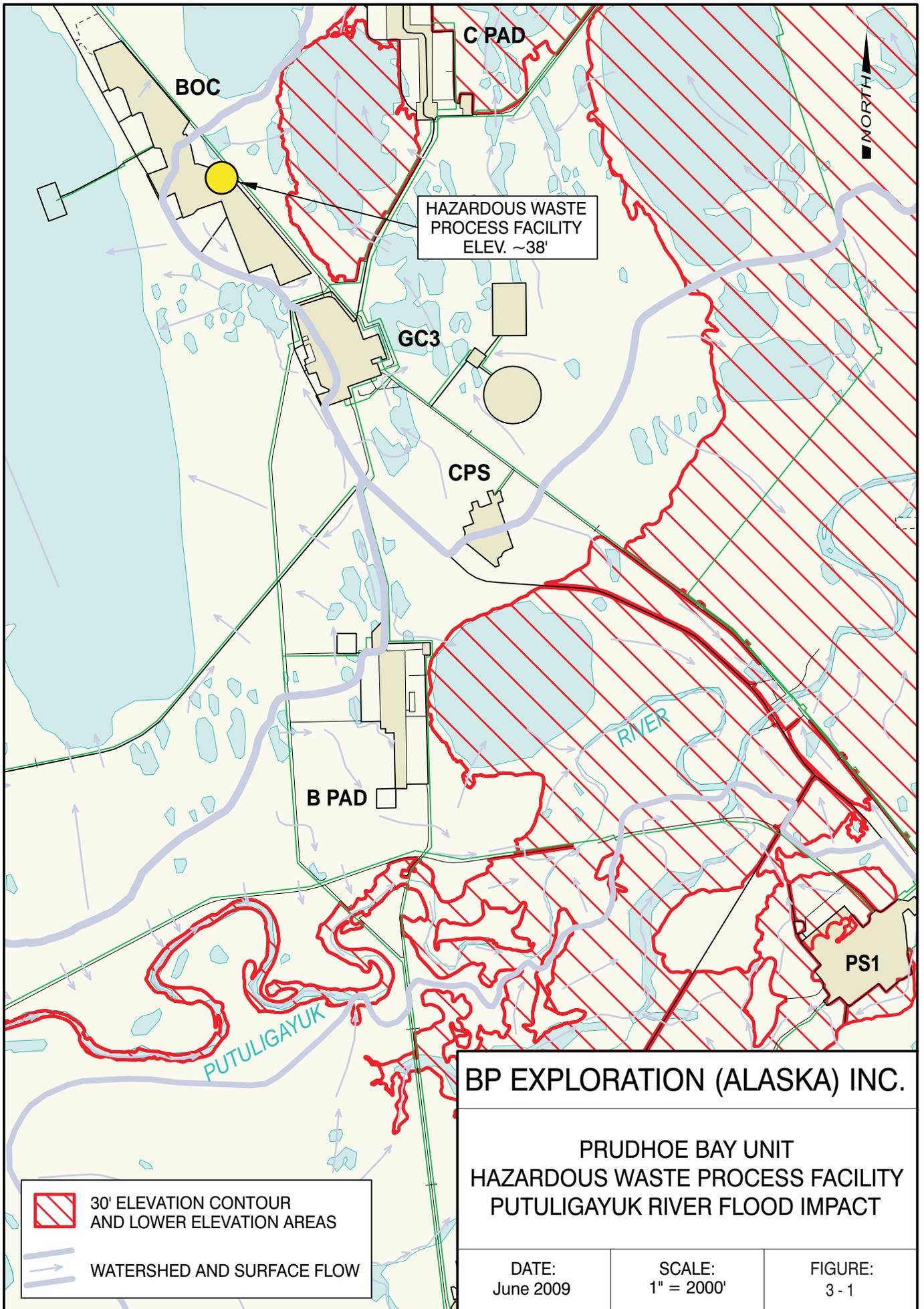
Portions of the Prudhoe Bay Unit facility are within the 100-year flood plain. However, washout (i.e., movement of hazardous waste from the active portion of the facility as a result of flooding) will not occur because the HWPF, the active portion of the facility, is outside the 100-year flood plain.

The HWPF is located approximately 2 miles northwest of the Putuligayuk (Put) River. The Put River is discussed here as it is the closest river to the HWPF for which flood data are available, and no other rivers that are closer to the HWPF would pose a greater flood danger. The following information was derived from "Putuligayuk River Stilling Basin Repair," by G. N. McDonald and Associates (Standard Alaska Production Company Contract #87MR32).

The primary flooding activity on the Put drainage (and the North Slope in general) is from melt of the winter snow pack. A report by G. N. McDonald indicates the 100-year

flood stage in the Put River area to be at an elevation of 25.84 feet. The elevation of the BOC Pad ranges from approximately 35 to 40 feet, with the HWPF at approximately 38 feet elevation; therefore, the HWPF on BOC Pad is not within the 100-year flood plain.

Since Federal Insurance Administration flood maps for the Prudhoe Bay area are not sufficiently detailed to make floodplain determinations, a topographical map of the Prudhoe Bay facility in the area of the HWPF is included as Figure 3-1. The 30 foot contour is indicated on the map to delineate the 100-year floodplain boundary.



Section 4

Other Federal Laws [40 CFR 270.275 (d)]

BP Exploration (Alaska) Inc.
Prudhoe Bay Unit
RCRA ID AKD000643239

Hazardous Waste Standardized Permit Application

Section 4 - Other Federal Laws
[40 CFR 270.275 (d)]

This section provides information on the specific obligations of EPA under the federal laws identified in 40 CFR 270.3, specifically:

- Wild and Scenic Rivers Act
- National Historic Preservation Act of 1966
- Endangered Species Act
- Coastal Zone Management Act
- Fish and Wildlife Coordination Act

While the Prudhoe Bay facility covers an area of approximately 385 square miles, the waste generating activities and operations, including construction activities, have been reviewed and evaluated for compliance with the specified federal laws because each has had a prior federal nexus that required compliance with these laws (e.g., Clean Water Act Section 404). In addition, activities in Alaska's coastal zone are required to comply with the Alaska Coastal Zone Management Plan, which ensures compliance with the Coastal Zone Management Act. The State of Alaska coordinates agencies' authorization and permitting authorities and processes to determine whether a given use is consistent with the standards and objectives of the Alaska Coastal Management Program.

Therefore, the following discussion addresses only the EPA obligations due to the EPA action of issuing a permit for storage of hazardous waste at the HWPF.

The Wild and Scenic Rivers Act. 16 U.S.C. 1273 et seq. Section 7 of the Act prohibits the Regional Administrator from assisting by license or otherwise the construction of any water resources project that would have a direct, adverse effect on the values for which a national wild and scenic river was established.

There are no designated wild and scenic rivers within or adjacent to the Prudhoe Bay facility.

The National Historic Preservation Act of 1966. 16 U.S.C. 470 et seq. Section 106 of the Act and implementing regulations (36 CFR 800) require the Regional Administrator, before issuing a license, to adopt measures when feasible to mitigate potential adverse effects of the licensed activity on properties listed or eligible for listing in the National Register of Historic Places. The Act's requirements are to be implemented in cooperation

with State Historic Preservation Officers and upon notice to, and when appropriate, in consultation with the Advisory Council on Historic Preservation.

The activity that would be authorized by the standardized permit (i.e., storage of hazardous waste) would not involve any construction, renovation, or change of operations. The waste storage will be inside an existing building, the HWPF, which is an industrial building that is not capable of being listed on the National Register of Historical Places. Therefore, the storage of hazardous waste in the HWPF would not have any foreseeable adverse effects on properties listed or eligible for listing in the National Register of Historic Places.

Future activities that are conducted within the Prudhoe Bay facility for the October 3, 2007 *Administrative Order for Corrective Action under Section 3008(h) of the Resource Conservation and Recovery Act, BPXA's Prudhoe Bay Facility, Environmental Protection Agency ID No. AKD00064329* (Order) will also consider other applicable federal laws such as the National Historic Preservation Act. In accordance with Paragraph 130 of the Order, all work required by the Order shall be undertaken in accordance with the requirements of all applicable local, state, and federal laws and regulations, and BPXA shall timely obtain or cause its representatives to timely obtain all permits and approvals necessary under such laws and regulations. Attachment D, Part I, A 2(b)(4) of the Order describes a specific requirement, for the Site Background section of the Site-Wide Project Work Plan, for verification that an archeological assessment has been completed and is on the State Preservation List. It also requires that all SWMU and AOC sites will be screened against the list by an approved state authority.

The Endangered Species Act. 16 U.S.C. 1531 et seq. Section 7 of the Act and implementing regulations (50 CFR 402) require the Regional Administrator to ensure, in consultation with the Secretary of the Interior or Commerce, that any action authorized by EPA is not likely to jeopardize the continued existence of any endangered or threatened species or adversely affect its critical habitat. Within the Prudhoe Bay facility, threatened species include spectacled eider, Steller's eider and, more recently, the polar bear.

As of May 2008, polar bears were listed as threatened under the Endangered Species Act. Each year, BPXA requests and obtains a Letter of Authorization (LOA) for the incidental, unintentional take, and an Authorization for Intentional Harassment (Deterrence) of Polar Bears for activities in the Prudhoe Bay facility. The LOA is obtained to fulfill the requirements of 50 CFR 18.124 pertaining to the nonlethal, incidental taking of marine mammals related to oil and gas operations and maintenance activities in BP-operated fields; and Sections 101(a)(4)(A), 109(h) and 112(c) of the Marine Mammal Protection Act to intentionally take polar bears by hazing (deterrence) activities. BPXA has developed and implemented a Polar Bear Interaction Plan in order to comply with the LOA. The LOA will assist EPA in their Section 7 consultation for polar bears [ref: May 15, 2008, Interim Final Rule for Polar Bear (73 FR 28306)].

Additionally, the standardized permit will require secondary containment, inspections, contingency plans, and other operational controls to prevent the release of hazardous wastes. These measures will prevent hazardous waste storage activities from attracting or directly harming wildlife, including polar bears.

Future activities that are conducted within the Prudhoe Bay facility for the October 3, 2007 *Administrative Order for Corrective Action under Section 3008(h) of the Resource Conservation and Recovery Act, BPXA's Prudhoe Bay Facility, Environmental Protection Agency ID No. AKD00064329* (Order) will also consider other applicable federal laws such as the Endangered Species Act. In accordance with Paragraph 130 of the Order, all work required by the Order shall be undertaken in accordance with the requirements of all applicable local, state, and federal laws and regulations, and BPXA shall timely obtain or cause its representatives to timely obtain all permits and approvals necessary under such laws and regulations. Attachment D, Part I, A 2(b)(3) of the Order describes a specific requirement, for the Site Background section of the Site-Wide Project Work Plan, to include an overview discussion of regional plants and animals, with a focus on, but not limited to, any species listed as endangered or threatened under the Endangered Species Act and including a description of critical habitat.

The Coastal Zone Management Act. 16 U.S.C. 1451 et seq. Section 307(c) of the Act and implementing regulations (15 CFR 930) prohibit EPA from issuing a permit for an activity affecting land or water use in the coastal zone until the applicant certifies that the proposed activity complies with the State Coastal Zone Management program, and the State or its designated agency concurs with the certification (or the Secretary of Commerce overrides the State's nonconcurrence).

The activity that would be authorized by the standardized permit (i.e., storage of hazardous waste) would not affect land or water use in the coastal zone.

Future activities that are conducted within the Prudhoe Bay facility for the October 3, 2007 *Administrative Order for Corrective Action under Section 3008(h) of the Resource Conservation and Recovery Act, BPXA's Prudhoe Bay Facility, Environmental Protection Agency ID No. AKD00064329* (Order) will also consider other applicable federal laws such as the Coastal Zone Management Act. In accordance with Paragraph 130 of the Order, all work required by the Order shall be undertaken in accordance with the requirements of all applicable local, state, and federal laws and regulations, and BPXA shall timely obtain or cause its representatives to timely obtain all permits and approvals necessary under such laws and regulations.

The Fish and Wildlife Coordination Act. 16 U.S.C. 661 et seq. requires that the Regional Administrator, before issuing a permit proposing or authorizing the impoundment (with certain exemptions), diversion, or other control or modification of any body of water, consult with the appropriate State agency exercising jurisdiction over wildlife resources to conserve those resources.

The activity that would be authorized by the standardized permit (i.e., storage of hazardous waste) would not impound, divert, or otherwise control or modify any body of water.

Future activities that are conducted within the Prudhoe Bay facility for the October 3, 2007 *Administrative Order for Corrective Action under Section 3008(h) of the Resource Conservation and Recovery Act, BPXA's Prudhoe Bay Facility, Environmental Protection Agency ID No. AKD00064329* (Order) will also consider other applicable federal laws such as the Fish and Wildlife Coordination Act. In accordance with Paragraph 130 of the Order, all work required by the Order shall be undertaken in accordance with the requirements of all applicable local, state, and federal laws and regulations, and BPXA shall timely obtain or cause its representatives to timely obtain all permits and approvals necessary under such laws and regulations.

Section 5

Solid Waste Management Unit Information [40 CFR 270.275 (e)]

**BP Exploration (Alaska) Inc.
Prudhoe Bay Unit
RCRA ID AKD000643239**

Hazardous Waste Standardized Permit Application

**Section 5 - Solid Waste Management Unit Information
[40 CFR 270.275(e)]**

Information that is required in 40 CFR 270.14(d) regarding solid waste management units (SWMUs) at the Prudhoe Bay facility has been submitted by BPXA in accordance with the October 3, 2007 *Administrative Order for Corrective Action under Section 3008(h) of the Resource Conservation and Recovery Act (RCRA), BPXA's Prudhoe Bay Facility, Environmental Protection Agency ID No. AKD000643239, EPA Docket No:RCRA-10-2007-022* (Order). The Order was executed between EPA Region 10 and BPXA. Specifically, the Site-Wide Background Report and the Current Conditions Report contain the required information regarding SWMUs at the Prudhoe Bay facility (ref: *Site-Wide Project Work Plan-Part 1, Part 1: Site-Wide Background Report and Site-Wide Project Work Plan-Part 1: Part 2: Current Conditions Report, Prudhoe Bay Facility, Alaska. January 28, 2008*).

One of the SWMUs identified in the Order is currently being addressed under a previously issued August 6, 1999 *Administrative Order on Consent, Tuboscope Site, Prudhoe Bay Facility, BP Exploration (Alaska) Inc., Prudhoe Bay Western Operating Area, EPA Docket No: RCRA-10-99-0179*, which was also executed between EPA Region 10 and BPXA. In accordance with the Tuboscope Site Order, BPXA has implemented RCRA Interim Measures at the former Tuboscope site since 2000. Future site investigation and remediation activities at the Tuboscope site are scheduled to transition and become part of the 2007 Order.

For purposes of the October 3, 2007 Order for the Prudhoe Bay facility, a SWMU is defined as any discernible unit at which solid wastes have been placed at any time irrespective of whether the unit was intended for the management of solid or hazardous wastes, including those areas of or at the facility where solid waste has been treated, stored, disposed of, managed, or released. In addition, an Area of Concern (AOC) is defined as any area of the site where a release to the environment of hazardous waste or hazardous constituents has occurred, is suspected to have occurred, or may occur, regardless of the frequency or duration of the release.

The objectives of the Order include the following:

- To recognize and utilize, to the extent possible, data and information collected during voluntary investigations or corrective action activities conducted at the site under the oversight of the Alaska Department of Environmental Conservation.

- To conduct site investigations as necessary to determine the nature and extent of contamination and any threat to the public health or the environment caused by the release or threatened release of hazardous wastes and/or hazardous constituents at or from SWMUs and/or AOCs at the site, to report on those investigations, as needed, and to provide sufficient data and information to design and implement any necessary corrective measures.
- To conduct Corrective Measures Studies as necessary to identify and evaluate, in accordance with the results of the site investigation and other such data as may be relevant or necessary, the Corrective Measures alternatives necessary to mitigate, remedy or otherwise respond to any release, threatened release or migration of hazardous wastes and/or hazardous constituents at or from the site.
- To design and implement the Corrective Measures selected by EPA in accordance with the process and requirements set forth in the Order.
- To implement any Interim Measures that may be required to control or abate immediate threats to human health and/or the environment and to prevent or minimize the potential release or spread of hazardous wastes and/or hazardous constituents into the environment at or from the site throughout the implementation of the Order
- To perform any other activities necessary to address, correct, or evaluate actual or potential threats to human health and/or the environment resulting from the release or potential release of hazardous waste and/or hazardous constituents at or from the site.
- To recognize to the extent possible the ongoing and long-term nature of the operations at the Prudhoe Bay facility while at the same time requiring BPXA to prioritize and expedite necessary Corrective Measures on a media- and Project Area-specific basis based on risk to human health and the environment.

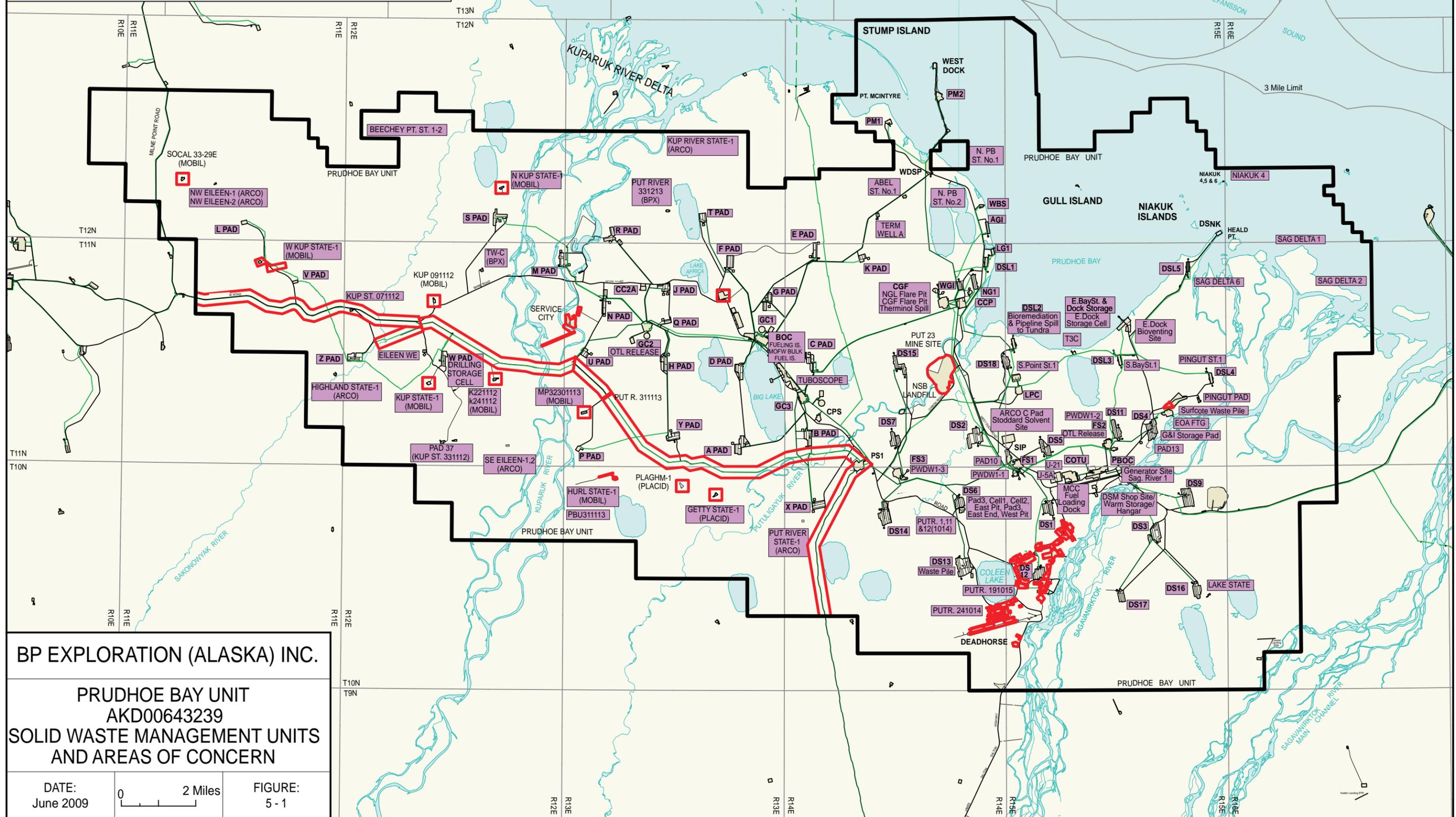
The following types of SWMUs within the Prudhoe Bay facility are identified in the Order, along with a listing of individual SWMUs:

- I Inactive Production Reserve Pits
- II Inactive Exploration Sites
- III Inactive Oily Waste Cells
- IV Tuboscope
- V Alaska Charter Sites (Contaminated Sites or Potential Areas of Concern)
- VI Non-Charter Sites (Contaminated Sites or Potential Areas of Concern)
- VII Old Landfill Sites
- VIII Other Inactive Impoundments
- IX Active Operational Sites Where Releases May Have Occurred, Potential Areas of Concern
- X Other Active Operational Sites (Solid Waste Cells)

Figure 5-1 is a map that shows the locations of SWMUs in the Prudhoe Bay facility identified in Appendix C of the Order (ref: *Site-Wide Project Work Plan-Part 1, Part 2: Current Conditions Report, Prudhoe Bay Facility, Alaska. January 28, 2008*).

In order to satisfy the requirements in 40 CFR 270.14(d) for the standardized permit application, the October 3, 2007 *Administrative Order for Corrective Action under Section 3008(h) of the Resource Conservation and Recovery Act (RCRA)*, *BPXA's Prudhoe Bay Facility, Environmental Protection Agency ID No. AKD000643239*; the August 6, 1999 *Administrative Order on Consent, Tuboscope Site, Prudhoe Bay Facility, BP Exploration (Alaska) Inc.*; and specific deliverables required under the 2007 Order (Site-Wide Background Report and Current Conditions Report) are incorporated by reference.

- RCRA REGULATED FACILITY (PRUDHOE BAY UNIT - 386 SQ MILES)
 - EXCLUDED AREAS
 - SOLID WASTE MANAGEMENT UNITS AND AREAS OF CONCERN
- *PRUDHOE BAY UNIT BOUNDARY CURRENT AS OF MAY 2009
- *PRUDHOE BAY SITE MAP BPXA ADMINISTRATIVE ORDER ON CONSENT
U.S. EPA DOCKET NO. RCRA-10-2007-0222



BP EXPLORATION (ALASKA) INC.

**PRUDHOE BAY UNIT
AKD00643239
SOLID WASTE MANAGEMENT UNITS
AND AREAS OF CONCERN**

DATE: June 2009

0 2 Miles

FIGURE: 5 - 1

Section 6

Compliance Audit and Certification [40 CFR 270.275 (f)]

Certification Statement

The following certification, as written in 40 CFR 270.280, is based on an audit of BPXA's Prudhoe Bay Unit (Greater Prudhoe Bay) RCRA facility's compliance with 40 CFR Part 267.

I certify under penalty of law that:

(1) I have personally examined and am familiar with the report containing the results of an audit conducted of my facility's compliance status with 40 CFR Part 267, which supports this certification. Based on my inquiry of those individuals immediately responsible for conducting the audit and preparing the report, I believe that my existing facility complies with all applicable requirements of 40 CFR Part 267 and will continue to comply until the expiration of the permit;

(2) I will make all information that I am required to maintain at my facility by §§270.290 through 277.315 readily available for review by the permitting agency and the public; and

(3) I will continue to make all information required by §§270.290 through 277.315 available until the permit expires. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violation.

Signature: Janice L. Vosika Date: 5/12/2009

Name: Janice L. Vosika

Title: GPB Field Manager

(Note: References to 277.315, which are included in the above certification statement from 40 CFR 270.280, should be to 270.315.)

Prepared for:
BP Exploration (Alaska), Inc.
Anchorage, Alaska



RCRA Standardized Permit Audit Report

Greater Prudhoe Bay

ENSR Corporation
December 29, 2008
Document No.: 01006-087

Prepared for:
BP Exploration (Alaska), Inc.
Anchorage, Alaska

RCRA Standardized Permit Audit Report

Greater Prudhoe Bay

I certify, under penalty of law, that I performed the audit described in this report and that this report accurately describes the audit activities and findings.

Alex Roth

Prepared By

James D. Thomas

Reviewed By

ENSR Corporation
December 29, 2008
Document No.: 01006-087

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1.0 Executive Summary

On behalf of BP Exploration (Alaska), Inc. (BPXA), ENSR Corporation (ENSR) performed a compliance audit of BPXA's Hazardous waste Processing Facility (HWPF), located in Greater Prudhoe Bay (GPB). The objective of the audit was to verify compliance of BPXA's HWPF operations with 40 CFR 267 and to document any observed areas of noncompliance. The primary purpose of this report is to provide BPXA with a basis for a certification of compliance in their Notice of Intent to operate under the Resource Conservation and Recovery Act (RCRA) Standardized Permit for Storage and Treatment Units, as required by 40 CFR 270.280.

Objective evidence was obtained through interviews, documentation review, and observations made by the auditors. The onsite work was performed on October 20 and 21, 2008. The auditors were Jane Thomas P.E., CPEA, E-A and Alexandra Post, AIEMA.

Due to the nature of this audit and the scope of applicable regulatory requirements, the audit findings necessarily focus on areas of noncompliance. Such findings are presented in the attached Audit Findings/Corrective Action Report in the Appendix. Additionally, observations that do not constitute noncompliance situations are presented in the Appendix.

2.0 Audit Objectives

The objective of the audit of BPXA's HWPF at GPB was to verify compliance with 40 CFR 267, as required by 40 CFR 270.275(f) and 270.280(c), and to document any observed areas of noncompliance.

BPXA is preparing a Notice of Intent to operate their GPB HWPF under the RCRA Standardized Permit for Storage and Treatment Units. As part of the Notice of Intent, an audit of the facility's compliance with 40 CFR 267 must be conducted and a written audit report, signed and certified as accurate by the auditors, must be submitted to the U.S. Environmental Protection Agency (EPA) with the Notice of Intent required by 40 CFR 124.202(b). This document constitutes the written audit report.

3.0 Audit Criteria and Scope

The audit scope and criteria were defined by the requirements of 40 CFR 267, which applies to facilities that treat or store hazardous waste under a Standardized Permit. Since all of Greater Prudhoe Bay operates under one EPA Generator Identification Number (AKD000643239), the facility that will be covered under the Standardized Permit includes the entire GPB unit. However, since the only location in GPB where hazardous waste is stored is the HWPF, the scope of the audit was the activities of the HWPF.

The audit criteria included all applicable sections of 40 CFR 267, including:

- Subpart A – General
- Subpart B – General Facility Standards

- Subpart C – Preparedness and Prevention
- Subpart D – Contingency Plan and Emergency Procedure
- Subpart E – Recordkeeping, Reporting, and Notifying
- Subpart F – Releases from Solid Waste Management Units
- Subpart G – Closure
- Subpart H – Financial Requirements
- Subpart I – Use and Management of Containers

This scope of this audit report does not include activities such as waste generation, Satellite Accumulation Areas (SAAs) management, and transportation of wastes to the HWPF. Hazardous waste is generated at various locations in GPB by BPXA employees and contractors. Hazardous waste is stored in SAAs in the area where they are generated. Operators-in-Control (OICs) are assigned for each SAA. The OICs manage the use of the SAA containers in their areas until the wastes are transferred to the HWPF.

4.0 Methodology

The audit was conducted using a representative sampling approach. Objective evidence was obtained through interviews, documentation review, and observations made by the auditors. The onsite work was performed on October 20 and 21, 2008. The auditors were Jane Thomas P.E., CPEA, E-A and Alexandra Post, AIEMA.

The audit was conducted according to the following key tasks:

- **Pre-Audit Preparation:** Prior to the audit, the auditors prepared for the assessment by familiarizing themselves with HWPF operations and the existing Part B permit application, meeting with BPXA Anchorage personnel, and preparing an audit protocol for the facility to be assessed. The audit protocol was based on Specialty Technical Publishers (STP) Environmental Auditing Federal Compliance Guide (Release #153, June 2008).
- **Review of BPXA Documentation:** Prior to the on-site portion of the audit, the auditors reviewed records and documents maintained in the BPXA Anchorage facility
- **On-Site Audit:** Records maintained at the HWPF (e.g., shipment records, inspections records, and waste analyses) were reviewed during the site visit. The Hazardous Waste Coordinators, the Hazardous Waste Technical Authority, several SAA Operators in Control, and other appropriate workers were interviewed. Observations were made of the HWPF and a sampling of SAAs across the field.

5.0 Findings

The findings identified by the auditors are presented in the Appendix of this report. A finding is a non-fulfillment of a requirement within the stated audit criteria. Observations are observed issues that do not necessarily constitute noncompliance situations, but that are reported to BPXA as opportunities to strengthen their system of ensuring compliance. Examples of an observation include the following:

- Minor noncompliance (e.g., a typographical error or a very isolated incident which is minor in environmental severity);
- Procedure or plan which is inconsistent or not clear;
- Situation which may potentially lead to a nonconformity if not addressed; and
- Suggested opportunity for improvement.

The following four areas of noncompliance were identified:

- The Hazardous Waste Contingency Plan did not include current emergency contact information.
- The Biennial Reports submitted to EPA in 2002 and 2004 did not include all required information.
- Several weekly inspection logs were missing required information.
- The daily ramp inspection log form did not include a record of the time of the inspections.

The following five observations were made:

- The daily ramp inspection log form did not include a separate column for notation of observations made, as well as the date and nature of repairs and remedial action. This information is currently written in the margins as needed.
- Information about required inspections was not included in the HWPF and Office Operating Procedures.
- A written record was not available for the initial and annual training undertaken by the Hazardous Waste Coordinators prior to January 2006. At that time, the course "Contingency Plan and Emergency Procedures for the Hazardous Waste Process Facility": (HSEENV042) was initiated in BPXA's electronic learning management system, VTA.
- Several Land Disposal Restriction (LDR) forms were missing information.
- The Hazardous Waste Contingency Plan information on Coordination Agreements appeared to describe the situation prior to BPXA operating the entire GPB.

These areas of noncompliance and observations are presented in the Audit Findings/Corrective Action Report in the Appendix. For each area of noncompliance and observation, the following is provided:

- Description of the area of noncompliance or observation
- Regulatory citation and reference text

- Recommended corrective actions

The audit results should be viewed as a compliance snapshot at the time of the audit.

APPENDIX

AUDIT FINDINGS / CORRECTIVE ACTION REPORT AND

OBSERVATION REPORT

Finding Number: 1**Subject:** Hazardous Waste Contingency Plan

Area of Noncompliance: The Hazardous Waste Contingency Plan did not include current emergency contact information. For several of the positions listed in Table 1 of the plan, the individuals noted no longer held those positions. Examples include John Booth as GPB Environmental Team Lead, Bill Dawley as GPB Environmental Advisor, and Steve Marshall as BPXA President. In Section 2 of the plan, the Environmental Team Lead is listed as the Primary Emergency Coordinator.

References:40 CFR 267.52(a)(3)

“List names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator (see §267.55), and you must keep the list up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates.”

40 CFR 267.54(d)

“You must review, and immediately amend the contingency plan, if necessary, whenever: . . .
(d) You change the list of emergency coordinators.”

Recommended Corrective Actions:

1. Update the Hazardous Waste Contingency Plan with new personnel and contact information.
Note: The contact information was updated prior to submission of the final audit report.
2. Review and update the Hazardous Waste Contingency Plan when personnel in listed plan change.
3. Consider noting in Section 2 that home contact information is not provided in the plan since the GPB positions are covered continuously.

1. Finding Number: 2

Subject: Biennial Report

Area of Noncompliance: The Biennial Reports submitted to EPA in 2002 and 2004 did not include all required information. These reports lacked the following items:

- The most recent closure cost estimate;
- A description of the efforts undertaken during the year to reduce the volume and toxicity of generated waste; and
- A description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years.

BPXA has had significant communications with EPA related to discrepancies between the regulations and the reporting forms and electronic reporting format. Additionally, BPXA has annually submitted the most recent closure cost estimate in its financial test and corporate guarantee for closure package.

References:

40 CFR 265.75 (as in regulations in effect 2001 - 2004)

“The report [biennial] must cover facility activities during the previous calendar year and must include the following information: . . .

(g) The most recent closure cost estimate under Sec. 265.142 . . .

(h) For generators who treat, store, or dispose of hazardous waste on-site, a description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated.

(i) For generators who treat, store, or dispose of hazardous waste on-site, a description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years . . .”

40 CFR 267.75(a) (as in current regulations)

“You must prepare and submit a single copy of a biennial report to the Regional Administrator by March 1 of each even numbered year. The biennial report must be submitted on EPA form 8700–13B. The report must cover facility activities during the previous calendar year and must include: . . .

(4) The most recent closure cost estimate under §267.142;

(5) A description of the efforts undertaken during the year to reduce the volume and toxicity of generated waste.

(6) A description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years to the extent such information is available for the years prior to 1984.”

Recommended Corrective Actions:

1. Continue to use format used for the Biennial Report submitted in 2008, which included all required information.

Finding Number: 3

Subject: Inspection Logs

Area of Noncompliance: Several weekly inspection logs were missing required information. Five did not include the time of the inspection and four did not include the name of the inspector.

References:

40 CFR 267.15(d)

“You must record all inspections. You must keep these records for at least three years from the date of inspection. At a minimum, you must include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions.”

Recommended Corrective Actions:

1. Review inspection log requirements with Hazardous Waste Coordinators.

Finding Number: 4

Subject: Inspection Logs

Area of Noncompliance: The daily ramp inspection log form did not include a record of the time of the inspections.

References:

40 CFR 267.15(d)

“You must record all inspections. You must keep these records for at least three years from the date of inspection. At a minimum, you must include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions.”

Recommended Corrective Actions:

1. Insert column for recording time of inspection into the daily ramp inspection log form.
Note: A column for recording time was added to the ramp inspection log form prior to submission of the final audit report.
2. Review inspection log requirements with Hazardous Waste Coordinators.

Observation Number: 1

Subject: Inspection Logs

Observation: The daily ramp inspection log form did not include a separate column for notation of observations made, as well as the date and nature of repairs and remedial action. This information was being written in the margins as needed.

References:

40 CFR 267.15(d)

“You must record all inspections. You must keep these records for at least three years from the date of inspection. At a minimum, you must include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions.”

Recommended Corrective Actions:

1. Consider inserting at least one additional column into the daily ramp inspection log form for use as a designated space to record notations and information about repairs and remedial actions.

Observation Number: 2

Subject: Inspection Logs

Observation: Information about required inspections was not included in the HWPF and Office Operating Procedures. The requirements for a written inspection schedule were satisfied by information contained on the inspection log form; however, the operating procedures did not document the need for inspections and the inspection frequency.

References:

40 CFR 267.15(b)(1) and (2)

“You must develop and follow a written schedule for inspecting, monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment (such as dikes and sump pumps) that are important to preventing, detecting, or responding to environmental or human health hazards.

(1) You must keep this schedule at the facility.

(2) The schedule must identify the equipment and devices you will inspect and what problems you look for, such as malfunctions or deterioration of equipment (for example, inoperative sump pump, leaking fitting, etc.).”

Recommended Corrective Actions:

1. Since inspections are an essential part of the operation of the HWPF, consider adding to the HWPF and Office Operating Procedures a line item referencing the inspection schedule.

Observation Number: 3

Subject: Training

Observation: A written record was not available for the initial and annual training undertaken by the Hazardous Waste Coordinators prior to January 2006. At that time, the course "Contingency Plan and Emergency Procedures for the Hazardous Waste Process Facility" (HSEENV042) was initiated in BPXA's electronic learning management system, VTA.

References:

40 CFR 267.16(d)

"You must maintain the following documents and records at your facility: . . .

(4) Records that document that facility personnel have received and completed the training or job experience required under paragraphs (a), (b), and (c) of this section."

Recommended Corrective Actions:

1. Gather a written record of training required by 40 CFR 267.16 that the Hazardous Waste Coordinators received prior to January 2006, and maintain a copy of those records in the HWPF files.

Observation Number: 4**Subject:** Land Disposal Restriction forms**Observation:** Several Land Disposal Restriction (LDR) forms were missing information. One single form was not signed by the generator and one packet of forms did not have any treatability boxes marked.

The practice of the Waste Coordinators was to send LDR forms with each shipment of hazardous waste, not just the initial shipment of each type of waste. The forms with missing information were not the initial shipments.

References:

40 CFR 267.73(b)(10)

“You must record the following information, as it becomes available, and maintain the operating record until you close the facility: . . .

For an on-site storage facility, the information in the notice (except the manifest number), and the certification and demonstration, if applicable, required by you under 40 CFR 268.7”

Recommended Corrective Actions:

1. Thoroughly review all LDR forms for completeness and accuracy prior to shipments rather than relying on the information pre-printed by the vendor.

Observation Number: 5

Subject: Hazardous Waste Contingency Plan

Observation: The Hazardous Waste Contingency Plan information on Coordination Agreements appeared to describe the situation prior to BPXA operating the entire GPB. Section 6 of the plan states, "Coordination agreements exist between the major operators of the Prudhoe Bay Unit."

References:

40 CFR 267.51(a)

"Your contingency plan must: . . .

(2) Describe all arrangements agreed upon under 40 CFR 267.36 by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services."

Recommended Corrective Actions:

1. Update the language in Section 6 of the Hazardous Waste Contingency Plan to more accurately reflect the current situation of a single operator of GPB.

Section 7

Closure Plan and Closure Cost Estimate [40 CFR 270.275 (g) and (h)]

Closure Plan

**BP Exploration (Alaska) Inc.
Prudhoe Bay Unit
EPA ID# AKD000643239**

Hazardous Waste Process Facility

Prepared By

**BP Exploration (Alaska) Inc.
900 East Benson Boulevard
P.O. Box 196612
Anchorage, Alaska 99519-6612**



**Revision 0
July 10, 2009**

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1 GENERAL INFORMATION

1.1 Introduction

This closure plan, including a closure cost estimate, is prepared in accordance with 40 CFR 270.275(g) and (h) requirements for an application for a Resource Conservation and Recovery Act (RCRA) Standardized Permit for Storage and Treatment Units (standardized permit) and to meet the regulatory requirements for closure summarized in 40 CFR 267, Subpart G at an existing hazardous waste management facility operated by BP Exploration (Alaska) Inc. (BPXA). The United States Environmental Protection Agency (EPA) Facility ID number for this facility is AKD000643239. The regulated unit specifically addressed in this closure plan is the hazardous waste container storage unit (process code S01) known as the Hazardous Waste Process Facility (HWPF).

BPXA has interim status to operate the Prudhoe Bay facility as an existing hazardous waste management facility. BPXA is applying for a standardized permit to store and non-thermally treat hazardous wastes on-site in containers in the Prudhoe Bay facility. The Prudhoe Bay facility is leased by BPXA from the State of Alaska Department of Natural Resources. The Prudhoe Bay facility, by agreement of EPA, is any land or operation under BPXA control within the Prudhoe Bay Unit on the North Slope of Alaska; i.e., the operating facility.

The regulated hazardous waste container storage unit that subjects the entire Prudhoe Bay facility to RCRA permitting is the HWPF. The HWPF is situated on the gravel pad containing BPXA's Base Operations Center (BOC) complex, and is a 50 foot x 60 foot structural steel frame building with insulated wall panels and a sealed concrete floor founded on steel piling. Figure 1 shows the floor plan of the HWPF.

BPXA submitted a revised Part B permit application in June 1998 to provide Part B permit application information of the HWPF as-built and to update the Part B permit application initially submitted on November 8, 1988. EPA authorized a change under interim status in the year 2000 to allow BPXA to begin storing hazardous waste generated on-site in the HWPF for greater than 90 days.

BPXA has prepared a Notice of Intent (NOI) and application for a RCRA standardized permit under the provisions of 40 CFR 267. This closure plan for the HWPF is submitted as part of that standardized permit application.

1.2 Facility Description

The Prudhoe Bay facility is a contiguous land area of approximately 385 square miles. Security gate checkpoints limit access to the oil field, and only persons authorized access are permitted through the checkpoints.

The Prudhoe Bay facility generates wastes related to oil and gas production operations and support facilities. Operations include, but are not limited to, oil and gas production wells, water and gas injection wells, operations centers, several flow stations/gathering centers, a central compressor plant, a central power plant, a seawater treatment plant, a seawater injection plant, a grind and inject facility, and a crude oil topping unit. Support facilities include vehicle maintenance shops, laboratories, paint shops, offices, warehouses, living quarters, dining facilities, pipelines, and electrical power transmission lines. Wastes accepted at the HWPF during the time it has been regulated under RCRA interim status regulations in 20 CFR Part 265 have predominantly included hazardous wastes generated by BPXA within the Prudhoe Bay facility boundary. As described in the 1998 RCRA Part B permit application, wastes have occasionally been accepted from outside the boundary on a case-by-case basis (e.g., from BPXA oil exploration projects and seismic operations). The standardized permit application has been prepared in accordance with 40 CFR 270.255(a)(1) to store or non-thermally treat hazardous waste generated by BPXA within the Prudhoe Bay facility.

1.3 Regional Features

The Prudhoe Bay facility is located on the North Slope of Alaska, approximately 250 miles north of the Arctic Circle and 175 miles west of the Alaska-Canada border, in the Arctic Coastal Plain region. The Prudhoe Bay facility is approximately 385 square miles in size and is comprised of the Eastern Operating Area (EOA) and Western Operating Area (WOA). Several discreet areas within the Prudhoe Bay facility boundary are excluded from the RCRA operating facility. These include individual Deadhorse least tracts, the Deadhorse airport, the North Slope Borough's Oxbow Landfill, specific gravel quarries, select exploration drilling sites, facilities owned and operated by oil industry support contractors such as Frontier Pad, Service City Pad, select pipeline corridors to non-Prudhoe Bay Unit facilities, and the Trans-Alaska Pipeline corridor.

The Prudhoe Bay facility occupies a region of low relief covered by numerous shallow lakes and drained lake basins. The mean annual precipitation (rain and snow) is less than 10 inches. Practical sources of groundwater do not exist in this region due to the presence of permafrost. Permafrost begins a few feet below the surface and extends to depths of 2,000 feet. The presence of permafrost also affects surface water features. Oriented thaw lakes cover over half the land surface of the region. These lakes form when permafrost prevents infiltration. The lack of topographic variation causes drainage patterns to be poorly defined, but surface streams and rivers generally flow north toward the Beaufort Sea.

1.4 Plan Objectives [Closure Performance Standard – 40 CFR 267.111]

This closure plan was prepared to be consistent with RCRA requirements for the “clean closure” of a hazardous waste container storage unit in the regulations; specifically, 40 CFR 267.111 - 267.115, and 267.176. Upon issuance of the RCRA standardized permit, the closure plan will become part of the permit. The HWPF is not expected to cease operations and close for many years, at which time the closure plan will be modified and

updated as needed to reflect changes in facility conditions including the types and amounts of hazardous waste that were handled, regulations, analytical and sampling methodologies, and other criteria.

This closure plan describes the measures to be taken by BPXA to minimize the need for further maintenance of the HWPF and to control, minimize, and eliminate, to the extent necessary to protect human health and the environment, the post-closure potential for releases or escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the ground or surface waters or to the atmosphere.

For purposes of this Closure Plan, which is for a future closure of the HWPF, draft screening level concentrations are presented for closure performance standards. Table 1 includes Draft Tier 1 Site Screening Levels that were developed in accordance with *Attachment D, Scope of Work for Site-Wide Project Work Plan, BPXA Administrative Order on Consent under Section 3008(h) of the Resource Conservation and Recovery Act (RCRA), BPXA's Prudhoe Bay Facility, Environmental Protection Agency ID No. AKD000643239, U.S. EPA Docket No. RCRA-10-2007-0222, October 3, 2007 (Order)*.

The draft screening levels are generic and for the most part do not take into consideration the site-specific conditions of Prudhoe Bay. The screening levels were compiled from a variety of sources including EPA and ADEC documents as well as background concentrations developed for certain constituents for soil and surface water in Prudhoe Bay. The screening levels were developed in consideration of both human health and ecological receptors. Typically, the lowest screening level value for each media and receptor type was chosen from among the reviewed sources. The draft screening levels represent highly conservative risk-based performance standards for use in identifying chemicals of potential concern for remedial investigations that are conducted under the Order, but may not be appropriate for use as remedial goals. As such, they may also be used to identify future site-specific chemicals of potential concern for further evaluation at the HWPF, if needed, at the time of closure.

In addition to the draft screening levels presented in Table 1, closure performance standards for polychlorinated biphenyls (PCBs) will also be considered at the time of closure. For purposes of this closure plan, a screening concentration of 10 micrograms PCBs per 100 square centimeters of applicable surfaces within the HWPF is presented; this concentration represents a conservative value for indoor unrestricted surfaces and is consistent with EPA policy in 40 CFR Part 761 Subpart G.

The HWPF's operating record of hazardous wastes that were managed in the unit and any releases of hazardous waste or hazardous waste constituents at the HWPF will also be used to identify chemicals of potential concern. Therefore, it is expected that the list of analytes and the closure standards will be updated and revised at the time of closure. Table 1 was submitted as an element of Part II of the Site-Wide Project Work Plan submittal under the Order (ref: *Screening Level Table (Tier 1) and Related Technical Memorandum, Elements of Part II of the Site-Wide Project Work Plan, March 2008*). The

screening levels were later included in an extended set of tables in Part III of the Site-Wide Work Plan submittal under the Order (ref: *Site-Wide Project Work Plan-Part III, Draft Conceptual Site Model and Screening Levels, June 2008*). The draft screening levels are under review by EPA Region 10; if there are changes to these screening levels in the future, it is expected that the revised levels will provide for equivalent or greater environmental and human health protection.

The closure plan includes procedures that will be used during the closure process to remove all hazardous waste and to decontaminate or remove hazardous waste residues, if any, from the HWPF so the closure performance standard is met. Once the HWPF has an EPA-approved closure plan, the closure plan is implemented, closure is certified by an independent, registered professional engineer, and EPA accepts the closure, it will no longer be designated as a hazardous waste management regulated unit and will be released to BPXA for other uses without any land use restrictions or institutional controls.

This plan also contains provisions for amending the closure plan, presents a schedule for closing the facility (at the time of closure), and provides an estimate of closure costs. Until final closure of the facility is completed and certified, copies of the closure plan and approved revisions to the approved closure plan will be maintained at the following locations, in addition to being accessible from the BPXA Health, Safety and Environment (HSE) Environmental Management System web site:

Hazardous Waste Process Facility Office
BPXA Base Operations Center
BPXA Prudhoe Bay Western Operating Area
Prudhoe Bay
North Slope Borough, Alaska

BPXA HSE Department
BP Exploration (Alaska) Inc.
900 E. Benson Blvd.
P.O. Box 196612
Anchorage, Alaska 99519-6612

2 PARTIAL CLOSURE OF FACILITY [40 CFR 267.112]

Partial closure of the RCRA facility is not planned since this is the only designated hazardous waste storage unit at the Prudhoe Bay facility. Two former hazardous waste container storage units located within the Prudhoe Bay facility have been closed. One was at C Pad in WOA (closure certificate dated August 17, 2004) and the other was at C Pad in EOA (closure certificate dated May 13, 2005). EPA accepted the two Certificates of Closure in correspondence dated February 27, 2007 and released BPXA from financial assurance specific to closure of the WOA C-Pad and EOA C-Pad in correspondence dated March 5, 2007. This closure plan does not address either of those two former

RCRA units or corrective action at any solid waste management units within the Prudhoe Bay facility.

3 FINAL CLOSURE OF FACILITY

3.1 Site Description

The existing hazardous waste management facility is the entire Prudhoe Bay facility, whereas the HWPF building is the one regulated unit that subjects the Prudhoe Bay facility to RCRA permitting requirements. The HWPF is designed to handle containerized wastes only; it does not include any hazardous waste tank systems, nor is it a Subpart DD Containment Building. The Handling Code (for Treatment, Storage and Disposal Methods, see 40 CFR 265 Appendix I, Table 2) for the HWPF is exclusively S01. Flammable and corrosive wastes have been stored separately, predominantly in hazardous materials cabinets which have built-in secondary containment.

3.2 Maximum Inventory of Wastes [40 CFR 267.112(b)(3)]

The maximum inventory of wastes is the design capacity of the HWPF. In the revised Part B permit application submitted in June 1998, and in the year 2000 when BPXA began storing hazardous waste inside the HWPF for greater than 90 days, the maximum inventory was 184 55-gallon drums. At that time, approximately half of the building was used for hazardous waste management activities and the remaining space was used for materials storage. The floor plan showing the maximum possible waste inventory was included in the June 1998 revision to the Closure Plan, and included in the June 1998 revised Part B permit application, as Figure 1. For the closure cost estimate in June 1998, the following breakdown of wastes was assumed, based on historical waste generation:

Flammable wastes:	150 drums
F-solvent wastes:	4 drums
Acid/base with RCRA metals:	10 drums
Light bulbs with lead:	20 drums

In 2002, the BPXA Materials Warehouse personnel relinquished control of areas within the building that they had used to store paint and other hazardous material (non-waste), and the entire building became available for hazardous waste container storage. Therefore, the storage capacity and thus the maximum inventory of wastes used for the closure cost estimate could be increased.

In the updated Closure Plan for the HWPF prepared in December 2004, the estimate was revised and updated, increasing the HWPF's maximum inventory to 444 drums, with the following breakdown of wastes, based on more recent historical waste generation:

Flammable and Off-Specification Oil (no halogenated compounds) drums	266
Chlorinated solvent/Waste Oil drums	40
Aqueous Acid/Base with RCRA metal drums	56
Lab Packs and RCRA Medical Waste drums	20
Mercury-Containing Waste drums	10
Lamps/Light Bulbs (containing lead and mercury) drums	52

This closure plan uses the maximum drum inventory and waste subcategory breakdown described above as merely a basis for estimating a closure cost. BPXA generates and stores a wide variety of hazardous waste, as indicated in the material receipt logs, in the RCRA Biennial Reports, and in Part A information included in the standardized permit application. Waste types and amounts also vary in conjunction with the types of projects, activities and waste minimization practices that are implemented throughout the Prudhoe Bay facility. This breakdown will be more accurately and precisely revised within 45 days of BPXA's written notification of final closure submitted under 40 CFR 267.112(d).

3.3 Closure Procedures [40 CFR 267.111]

When the HWPF is to be closed, the activities described below will be performed to achieve final closure. An updated project-specific BPXA Health and Safety Plan will also be followed for onsite closure activities.

3.3.1 Notification [40 CFR 267.112(d)(1)]

Regulatory agencies will be sent BPXA's written notification of final closure at least 45 days before BPXA expects to begin closure and the closure activities herein are initiated. Written notification of the intent to close the facility will be sent to EPA Region 10, the Alaska Department of Natural Resources and the Alaska Department of Environmental Conservation.

3.3.2 Inventory Removal [40 CFR 267.112(d)(2), .115(a), and .176]

After the notification to close the facility has been filed, no additional hazardous waste, non-hazardous waste, or hazardous materials will be accepted for storage at the facility. Closure will begin no later than 30 days after the final known volume of waste is accepted at the HWPF. Wastes present in the HWPF at the time of the final waste acceptance cut-off date will be inventoried and prepared for offsite shipment through waste disposal contractors that are under contract to BPXA at the time of closure.

Hazardous wastes that are on site at that time will be removed consistent with procedures followed during the active life of the unit. Wastes will be characterized for off-site disposal according to procedures outlined in BPXA's HWPF Waste Analysis Plan (WAP) and in accordance with waste analysis requirements in 40 CFR 267.13 and 40 CFR 268. It is anticipated that sampling of wastes in containers at the time of closure will be routine and minimal, as existing waste profiles will primarily be used for disposal. However, for purposes of the closure cost estimate and the requirement to use a worst-case estimate, it is assumed that the HWPF would have its maximum inventory (i.e., 444 drums of waste) and that half of the drums will require sampling and profiling. Disposable bailers will be used to sample drums to avoid cross-contamination and reduce decontamination-generated waste. Sampling procedures are described in the Sampling and Analysis section below, as well as the summary in Table 2.

All stored hazardous wastes will be removed within 90 days from the day that the last waste was accepted at the HWPF.

3.3.3 Decontamination [40 CFR 267.112(b)(4), .116, and .176]

Following removal of all containers of hazardous waste, universal waste, and non-hazardous solid waste, decontamination of equipment and the inside surfaces of the HWPF building will be performed by appropriately trained personnel. Any equipment that had been used in handling hazardous waste at the facility and that will not be disposed will be decontaminated. Such equipment and all areas of the facility, including storage areas, floors, and building walls will be decontaminated to the levels required by EPA Region 10 at the time of facility closure; i.e., closure performance standards.

The decontamination procedure will include, but not be limited to, the following activities for each type of equipment or surface.

Decontaminate Process Equipment:

- a) Any hoses that have been in contact with hazardous waste and/or hazardous material will be placed in a container and characterized for offsite disposal.
- b) A decontamination station will be established in an area convenient for performing the equipment decontamination activities and associated wastewater collection.
- c) Equipment that had come in contact with hazardous waste and/or hazardous materials will be decontaminated, including the cabinets and secondary containment pallets used to store drummed waste.

- d) Decontamination will be accomplished by manually scrubbing, washing, or spraying equipment with detergent solutions and/or steam or high pressure water.
- e) Decontaminated equipment will be rinsed with tap water until all detergent and other residue is washed away. The rinsing can be completed with a squeeze bottle and/or pressure washer, depending on the equipment being decontaminated.
- f) All spraying and steam cleaning will be conducted to minimize overspray and minimize the potential to spread waste constituents. Temporary berms may be installed to isolate and collect rinsate within areas of the building. All spent decontamination wash fluids and rinsate will be collected and containerized.
- g) Equipment that has been decontaminated will be allowed to air dry in a clean area.
- h) Any equipment used in the decontamination procedures (e.g., brushes, vacuum) will subsequently be either properly disposed or decontaminated by rinsing, flushing or steam cleaning. Steam cleaning will be conducted in a manner to minimize overspray, to keep from spreading the waste.
- i) Equipment that can not be decontaminated by rinsing or steam cleaning to the acceptable closure performance standard will be managed and disposed in accordance with applicable waste characterization and disposal requirements at the time of closure.
- j) All wastewater generated by decontamination activities will be collected in drums labeled as decontaminate rinsate. Such wastewater from various decontamination activities will be consolidated.

Decontaminate Process Area Floors, Building Walls, and Ceilings

- a) The building floor, interior walls and ceiling will be decontaminated after all decontaminated equipment and materials are removed from the building.
- b) The facility interior operating area will be swept free of dirt and debris.
- c) Ceilings will not be cleaned unless a spill occurred that could have contaminated the ceiling or if stained areas are visually observable.
- d) The following types of areas will be scrubbed and wipe cleaned in a focused manner with water and an ionic surfactant: any areas of visible staining, any known spill sites, and areas that for other reasons there is a concern of residual chemical contamination.
- e) The floor and interior walls of the HWPF will be decontaminated by high pressure rinsing with hot water or steam and an anionic surfactant. Rinsing will be started at the highest point, with work progressing down towards the floor. To minimize the chance of spreading any potential contaminants, rinsing will be aimed away from areas that have already

been decontaminated. Temporary berms may be installed to isolate and contain rinsate within areas of the building. Careful consideration will be made to not recontaminate already decontaminated areas.

- f) The rinsate will be vacuumed out until the area is dry and containerized for sampling and disposal.
- g) The HWPF does not have any trenching, drains, or sumps that would require additional attention during decontamination.

Confirmation Wipe Sampling

Confirmation wipe sampling will be performed after decontamination activities. The wipe samples are appropriate to monitor non-volatile analytes (e.g., semi-volatile organics and metals) on smooth, non-porous surfaces (e.g., metal, coated concrete). The purpose of the confirmation wipe sampling is to confirm that either:

- Equipment, structures, and buildings are not contaminated; or
- Contaminated equipment, structures, and buildings have been properly decontaminated.

Verification wipe sample collection will be conducted using a biased random sampling approach for the determination of sample locations and will include known or likely areas of contamination as determined by the HWPF operating record at the time of closure. For purposes of this closure plan, wipe tests will be collected at 12 locations within the building including walls, floors, and equipment. The sampling locations will be selected from areas that had contained visible staining prior to decontamination, any known spill areas, and any other identified potential areas of concern. A minimum of four of the wipe samples will be from the floor of the building and four will be from the walls. If no potential areas of concern are identified from facility records or visual observation, then samples will be collected from the following locations:

- Floor under two areas where waste containers were stored
- Floor under two areas where wastes were consolidated
- Area of wall approximately 1 foot from the floor near waste consolidation area
- An area of wall approximately 3 feet from the floor near waste consolidation area
- Another area of wall approximately 3 feet from the floor.
- Two areas of wall approximately 6 feet from the floor.
- Three pieces of equipment (e.g., overhead drum hoist)

Sample locations will be documented in writing on appropriately scaled building diagrams and with photographs. Additionally, two background wipe samples will be collected from interior doors or walls (selecting smooth and non-porous surfaces) at two locations inside the neighboring BOC living quarters area. Background samples will be collected from an unoccupied sleeping quarters and a television lounge, both areas that would not be expected to have or have had industrial activities or contaminations.

In addition to the two background samples, the following field quality control samples will also be analyzed:

- Field/Gauze Blanks – A blank will be analyzed for each analytical parameter using an unopened gauze pad shipped to the field and returned to the laboratory. This blank will serve to demonstrate cleanliness of the wipes used to conduct sampling. One gauze of each type will be analyzed with the 12 samples and two background samples collected.
- Duplicates – One duplicate will be collected for each parameter collected for analysis. Although these samples are not true duplicates, they should be collected side-by-side or below the original sample location. This data can be used to determine potential differences in contamination of surface areas.

Confirmation wipe sampling will be conducted using the following general guidelines, which will be adjusted at the time of closure in accordance with the selected laboratory's requirements for sample amounts and preservation:

- a) A template will be used to provide a fixed area for collecting wipe samples. The template will be constructed from a solid flat sheet of Teflon or an inert plastic, such as PVC or polyethylene, with a square opening of 10 centimeters by 10 centimeters.
- b) The sample media (i.e. filter paper or cotton gauze) will be placed in a clean sample bottle (2 to 4 oz. glass bottle with Teflon-lined cap), to which a controlled volume of solvent is added by the laboratory performing the analyses. The amount of solvent used per sample bottle will be consistent throughout the wipe sampling program and should be sufficient to saturate the sampling media with little or no excess left in the bottle.
- c) The solvent applicable to the species of analytes will be used, depending on the surface being sampled and the target analyte. The specific solvents will be described in revisions to this closure plan, at the time of closure, depending on the final selected list of target analytes. For purposes of this closure plan, total semivolatile organics will be sampled with methanol premoistened gauze pads, PCBs will be sampled with gauze pad

premoistened with hexane, and metals will be sampled with “Ghost Wipes” premoistened with deionized water.

- d) Gloved hands or forceps will be used to handle the sampling media, including taking the clean sampling media from its packaging and placing it into the sample container.
- e) Forceps will be stored in Ziploc bags between uses and decontaminated between samples. Alternatively, disposable forceps may be used to reduce cross contamination.
- f) Disposable templates will be used to avoid potential cross contamination.
- g) The sampler will approach each sample location with a wipe sample template, a prepared sample container, and the required gloves and other needed personal protection equipment.
- h) The prepared sampling media will be removed from the sample bottle manually and folded in half or in quarters. Sufficient solvent should be present to premoisten the wipe; excess solvent should not be present.
- i) The wipe sample template will be held firmly against the surface to be sampled with one gloved hand. Sufficient pressure should be maintained throughout the sampling process.
- j) With the sampling media in the other gloved hand, systematically and thoroughly wipe in one direction (e.g., left to right) using S-strokes covering the entire surface from edge to edge.
- k) While continuing to hold the template in the same location, refold the sampling media to expose unused surface and re-wiped the sampling location thoroughly using single strokes covering the entire surface from edge to edge again, this time at right angles to the first wipe (e.g., top to bottom).
- l) The sample media will then be placed into the sample container and the cap secured.
- m) Remove and discard gloves before handling the next the sampling media or container and between sampling locations.
- n) The sample container will then be managed as described in the Sample Handling section below.
- o) Sampling points will be marked with a tape measure from corners of the building, with sample coordinates recorded in the field notebook
- p) Wipe sampling for semivolatile organics, PCBs and metal will occur in side by side locations following the steps outlined above.
- q) Samples will be analyzed as described in the Sampling and Analysis section below.
- r) If contaminants of concern are detected in the wipe samples at levels above closure performance standards, the floor and interior walls will be decontaminated a second time, followed by collection of a second set of 12 wipe samples and field quality control samples.

Management of Decontamination Wastes

- a) All rinsate will be collected using a water-safe vacuum and collected and stored in compatible shipping containers.
- b) A composite sample of the rinsate will be collected.
- c) If analytical results indicate that the rinsate is hazardous waste, it will be evaluated for potential de-characterization (for fluids that only exhibit hazardous waste characteristics for ignitability, corrosivity, reactivity and toxicity) and disposal at a permitted BPXA Underground Injection Control (UIC) Class I non-hazardous injection well, in accordance with 40 CFR 268.1(c)(3) and 40 CFR 148.1(d). Alternately, if de-characterization is not feasible, the rinsate will be labeled, manifested, and disposed of at an appropriately permitted off-site treatment, storage or disposal facility (TSDF). If analytical results indicate that the rinsate is non-hazardous waste it will be disposed at a permitted BPXA UIC Class I non-hazardous injection well.
- d) Solid residuals from the decontamination process (e.g., used rags, personal protective equipment, and other disposable equipment) will be collected, analyzed, and characterized for appropriate off-site disposal.

3.3.4. Sample Handling

Sample Numbering - The field sample identification code provides the tracing of the sample from the location in the field, through laboratory analysis, and finally to data presentation.

Each sample will be assigned a unique field sample identification code and labeled accordingly. This field sample identification code will contain information traceable to the site, location, and other appropriate information unique to that sample. This code will be used for all references to this particular sample in all field and project documentation and reports.

All field quality control samples will be labeled and numbered so that the laboratory cannot distinguish them from other site samples.

Sample Labeling and Documentation - Individual sample labels will be affixed to the sample containers. Waterproof indelible ink will be used to ensure the integrity of the sample identification code. The following information will be included on each sample label for samples submitted for laboratory analysis:

- Project site
- Project number
- Sample collector name and initials

- Date and time of collection
- Field sample identification codes
- Analyses requested
- Preservation

Sample Storage, Transport, and Chain of Custody - Following sample collection and labeling, samples will be packaged for transport to the analytical laboratory. Samples will be stored in a cooler with ice or gel ice packs, and shipped to the laboratory within 24 hours of collection. The following shipping procedures will be used:

- Each sample container will be placed in a resealable plastic bag and wrapped in bubble pack or another inert material to prevent breakage prior to placement in a cooler.
- Ice will be placed in the coolers to keep samples at a temperature of 4°C +/-2°C.
- Prior to shipping, the signed and dated chain-of-custody forms will be placed in a sealed bag that is then taped inside the cooler lid.
- Custody seals will be placed on the front right and back corners of each cooler. Seals will be covered with clear tape.
- "This Side Up" labels will be placed on four sides of the cooler and "Fragile" labels will be placed on two sides. All drains will be taped shut.

Chain-of-custody procedures will be followed in accordance with standard EPA protocol in order to track the custody of the samples. The chain-of-custody form is designed to document the transfer of samples from the field to the laboratory. As such, the form summarizes the contents of the shipment and tracks the dates and times of any custody transfer, and signatures of all parties relinquishing and receiving the samples. The sampler must sign the chain-of-custody form(s) in the designated "sampler" space and the "relinquished by" space. A copy of the form is taken before the cooler is sealed, and the original form is placed in the sealed plastic bag and sealed inside the cooler. If temporary storage of the cooler is needed prior to shipment, it will be stored in a secured location.

When completed, this form will contain the following information:

- Sample numbers (corresponding to the sample ID numbers on the sample labels)
- Project number
- Project/client name and location
- Sampler's signature
- Custody seal number
- Date/time of sample collection

- Type of samples (e.g., wipe, liquid, solid)
- Analytical requirements
- Number and type of containers
- Remarks (e.g., wipe sample surface area)
- Date/time samples relinquished
- Date/time samples received

From the time the sample is collected, it will be under the direct control of the contracted field team. If a sample cooler is left unattended, it must be secured with a custody seal and signed by the responsible party. The custody seal will have an identification number on it, which will be recorded on the chain-of-custody form. Copies of the chain-of-custody forms will be returned by the laboratory with the analytical results. The form will indicate personal custody of the sample by dated signature and the analytical suite for each sample.

3.3.5 Field Records

Field records will be maintained to demonstrate that closure activities are conducted in a manner that is consistent with the approved closure plan and to document approved deviations from the closure plan, if necessary. Field records for the closure of the HWPF will be compiled in bound field notebooks or logbooks. The field notebooks will have consecutively numbered pages and documentation will be recorded using waterproof ink. Incomplete lines, incomplete and blank pages, and changes in the notebooks will be lined out with a single line, dated and initialed (no obliteration of an incorrect entry or use of correction tape or fluid). The information that will be recorded in the notebooks will include, at a minimum:

- The responsible person's name;
- The date and time of the activities
- References to field monitoring forms as necessary
- Daily field instrument calibration information, including the calibrator's name; the
- Instrument name and model; date and time of calibration; standard lot numbers used and their source; ambient temperature (if needed); results of calibration; and any corrective actions necessary
- Weather conditions, if applicable
- Topics and attendees of daily tailgate meetings
- Activities that are scheduled for the day, including a notation as to whether they have been completed on that day
- Approved deviations to the closure plan and rationale for deviations
- Name of personnel onsite and their representative companies
- Decontamination information
- Sampling information, including information coordinating sample handling activities with the appropriate field activities and chain-of-

custody documentation; equipment and methods used for field preparation of samples; field measurements for samples, if applicable, drawings and diagrams of sample locations

- Waste shipment information
- Unusual site or schedule conditions, including issues that delay closure activities
- Communications to and from oversight BPXA representatives and EPA or other appropriate regulatory agencies
- Project comments

Photographs may be taken to photodocument certain activities when necessary and appropriate. Printed copies of the photographs will be initialed by the person who took the photo and dated when the photo was taken (unless the photo is imprinted with the date taken). A Photo-Log or other listing of the photographs that were taken will be completed as the photographs are taken to record the identity of the photographer(s), date, time, location and a brief description of the photo, including anything of special note. Photographs taken of closure activities and the Photo-Log will be maintained as part of the HWPF closure field records.

3.4 Sampling of Facility Floor and Gravel Pad Materials

To date, there have been no hazardous waste releases inside or in the immediate vicinity of the HWPF that would impact the surface or subsurface gravel surrounding the building, and there is no observed staining on the gravel pad surface around the building. There are no visible surface cracks, breaches, or scouring in the HWPF floor coating that would indicate the integrity of the surface coating has been compromised. Inspections of the floor and the loading areas where hazardous wastes are transferred in and out of the building are routinely conducted and documented by trained personnel. Therefore, migration of hazardous wastes or hazardous waste constituents is not anticipated.

If, at the time of closure, a review of release records indicates that no hazardous waste releases have been reported in the immediate vicinity of the HWPF and if no stained areas are observed (from hazardous waste transfer operations in and out of the building, as no outside storage of hazardous waste will be conducted), additional sampling of the gravel pad surrounding the building and gravel removal actions would not be performed. Therefore, this closure plan does not include sampling or removal of gravel pad material surrounding or under the HWPF. If releases of hazardous wastes or hazardous waste constituents are reported in the vicinity of the HWPF due to HWPF loading and unloading operations, the closure plan will be revised accordingly.

In order to focus decontamination activities within the HWPF to any identified areas of concern, sampling and analysis will be performed in a tiered approach, starting with decontaminated surfaces. If contamination above closure performance standards is detected in the post-decontamination wipe samples, then decontamination of those

surfaces will be repeated, as described above. If closure performance standards are met after the subsequent decontamination, no additional sampling would be performed. If contamination is still redetected at levels above closure performance standards after the second decontamination, then the closure plan will be modified to address potential migration of contaminants to the floor or outside the building. Additional sampling and analysis of the concrete floor and the gravel pad would be performed and, depending on analytical results, removal of concrete or gravel pad material may be completed in order to achieve clean closure.

3.5 Sampling and Analysis (40 CFR 267.112(b)(4) and .176)

This section describes the sampling and analysis that will be performed, with summaries provided in Table 2 - Samples and Table 3 - Analytical Methods.

The following types of samples are included in this closure plan and will be collected during HWPF closure:

- Contents of containers of hazardous waste on-site at the time of final inventory removal, as needed for complete waste characterization
- Surface wipe samples of interior surfaces from inside the BOC living quarters to determine background levels of potential contaminants of concern
- Surface wipe samples of decontaminated equipment and structures inside the HWPF, for confirmation of decontamination
- Rinsate resulting from the decontamination operations, for waste characterization
- Solid waste resulting from decontamination, for waste characterization

Samples collected during the closure activities will be analyzed for the constituents of the wastes managed at the facility. The sampling of waste containers during the building de-inventory will follow guidance in the most current version of the BPXA controlled document procedure, *Hazardous Waste Process Facility Waste Analysis Plan (#UPS-US-AK-GPB-ALL-HSE-DOC-oo177-4)*, at the time of closure. Waste sampling methods for typical types of wastes that are managed at the HWPF and that are listed in the procedure include:

TYPE OF WASTE	METHOD REFERENCE
Extremely viscous liquid	ASTM Standard D140-70
Crushed or powdered material	ASTM Standard D346-75
Soil or rock-like material	ASTM Standard D420-69
Soil-like material	ASTM Standard D1452-65
Fly-ash-like material	ASTM Standard D2234-76
Containerized liquid waste	“Coliwasa” from <i>SW-846, Test Methods for Evaluating Solid Waste, Physical/Chemical Methods</i> , USEPA

For purposes of this closure plan, target analytes for the decontamination confirmation samples will include metals, PCBs, volatile organic compounds and semi-volatile organic compounds. Wipe samples will be analyzed for metals, PCBs and semi-volatile organic compounds only. Pesticides and herbicides are not used at the Prudhoe Bay facility and are not planned for inclusion in the target analytes list at this time. The list of analytes in Table 1 (Tier 1 Screening Levels) and PCBs is presented as the initial list of compounds that will be included for analysis and will be used in developing the final list of target analytes and closure performance standards at the time of closure. A summary of the analytical methods to be used during closure activities, the associated sample handling procedures, and the rationale for analyses are provided in Table 3. Table 4 provides the RCRA Toxicity Characteristic Leaching Procedure (TCLP) maximum concentrations that are referred to in Table 3, for waste characterization. The latest guidance available in *SW-846 Test Methods for Evaluating Solid Waste, Physical/Chemical Methods*, the *RCRA Waste Sampling Draft Technical Guidance*, and other appropriate sources will be used to determine the final approved analytical methods at the time of closure.

BPXA will submit for acceptance a revised updated closure plan at the same time the notification of closure is submitted to EPA in order to include an updated target analyte listing and best available sampling and analysis methods. During closure activities, EPA and State of Alaska laws and regulations will be complied with, and applicable regulatory guidance documents will be considered and integrated into the updated closure plan.

For purposes of this closure plan, the *Draft Quality Assurance Project Plan for Administrative Order for Corrective Action Under 3008(h) of the Resource Conservation and Recovery Act (RCRA) - BPXA's Prudhoe Bay Facility, Environmental Protection Agency ID No. AKD000643239, EPA Docket No.: RCRA-10-2007-0222., October 3, 2007. Revision 0, October 31, 2008* is incorporated by reference. All sampling under the closure plan will follow the RCRA Quality Assurance Project Plan (QAPP) for the facility that is current and approved at the time of closure. The QAPP will provide the appropriate quality assurance (QA) and quality control (QC) measures to be applied during facility closure and to stipulate requirements/criteria associated with the following:

- QA objectives
- Laboratory procedures
- General sample collection, handling and preservation
- Laboratory custody procedures
- Calibration and maintenance procedures and protocols for laboratory equipment
- Data reduction, validation, and reporting procedures
- Internal QC checks
- QA performance and system audits
- Preventive maintenance procedures and schedules
- Data assessment procedures, including processing, interpretation, and presentation

- Corrective actions
- QA reports

The laboratory that analyzes the samples will use best accepted practices at that time, such as use of EPA-approved analytical methods; adherence to QA and QC programs; certification by state and/or federal agencies when applicable; and observance of sample holding time dates. Results will be reported in normal unit conversions (e.g., ug/l or mg/l for aqueous and TCLP samples; ug/kg or mg/kg for solid/soil samples; or ug/ or mg/wipe for the wipe samples). Results will be reported to the laboratory reporting limit or method detection limit depending on which limit is necessary to meet project data quality objectives.

3.6 Waste Containers [40 CFR 267.176]

The removal of containers of hazardous waste that were stored at the HWPF or generated as a result of closure activities will be verified by an independent registered professional engineer. Containers will be sealed and labeled prior to shipment in accordance with RCRA and DOT regulatory requirements. BPXA will manifest all of the final containers of hazardous waste from the HWPF to one or more of the RCRA permitted TSDFs on contract at that time. Uniform Hazardous Waste Manifests will be prepared for all offsite shipments of hazardous waste; copies of the manifests will be maintained by BPXA as required in regulations and BPXA record retention policies.

In 2009, BPXA has contracts for hazardous waste transportation and disposal services with PSC Environmental Services, Inc. (dba Burlington Environmental, Inc.) at 1813 East 1st Ave., Suite 101, Anchorage, AK 99507 (EPA ID# AKD983068602), which typically ships hazardous waste from BPXA facilities to the Burlington Environmental, Inc. TSD facility at 20245 77th Avenue South, Kent, WA, 98032 (EPA ID# WAD991281767); and Emerald Alaska, Inc at 425 Outer Springer Loop, Palmer, AK 99645, which transports hazardous waste from BPXA facilities using EPA Transporter ID# WAD058364647. There are currently no permitted commercial RCRA TSD facilities in Alaska; therefore, hazardous waste from BPXA facilities are ultimately manifested to permitted facilities out of state.

BPXA may or may not have contracts with the companies mentioned above or other hazardous waste management companies at the time of final closure. BPXA periodically reviews contracts with permitted off-site commercial TSDFs and audits their facilities. Based on these reviews and audits, the list of TSDFs during the closure activities may include these and/or other permitted off-site commercial TSDFs. BPXA does not consider compliance with this closure plan to be contingent upon amending this closure plan if the names, addresses, or statuses of the TSD facilities named above change in any way prior to BPXA's submittal of the notification of final closure; nor will BPXA amend the closure plan if BPXA no longer maintains a contract with any of the named companies. These are the TSD facilities that BPXA would include if BPXA were closing the HWPF at the time this closure plan is submitted as part of the standardized permit application. They are also described in accordance with 40 CFR 267.112(b)(3) regarding

the types of off-site hazardous waste management units to be used for removing, treating, storing, or disposing of all hazardous wastes. The selected TSD facilities will either manage the hazardous waste in permitted regulated units at their facilities or transfer the hazardous waste to other RCRA permitted TSD facilities accompanied by another manifest for further hazardous waste management, as is the current common practice.

3.7 Non-Applicable Requirements [40 CFR 267.111(c), .201, and .1108]

No hazardous waste tank systems or containment buildings are located at the HWPF storage unit or within the Prudhoe Bay facility.

3.8 Closure Certification [40 CFR 267.117]

A certification that the HWPF has been closed following the approved closure plan will be submitted to EPA by registered mail within 60 days of completion of closure. The certification will be signed by the owner-operator (BPXA) and by an independent registered professional engineer. Accompanying this certification will be documentation supporting the independent registered professional engineer's certification. BPXA will identify the independent registered professional engineer for EPA in BPXA's notice of closure.

The engineer will certify the facility closure, based on completion of the following activities:

- Review operation logs and reports from decontamination and sampling
- Review confirmation wipe sample analyses and verify compliance with closure performance standards
- Review manifest and accompanying documentation regarding shipment of hazardous wastes offsite from the RCRA Storage Facility, and receipt by designated waste disposal destination
- Review historical logs of past spills and releases from the unit that may have entered the environment
- Inspect facility for confirmation of waste removal and lack of staining or other evidence of incomplete waste removal

The closure report will include written documentation, which was completed during closure, that these activities have been completed. The closure report will include, at a minimum:

- Documentation of all closure activities
- Summary of all analytical data, including raw laboratory data and QA/QC data, produced during the closure activities
- Description and rationale for all variations or departures from the closure plan
- Verification sample results and comparison to closure performance standards

- Drawings, diagrams, photo log documentation for sampling locations and other relevant on-site activities and visual observations during closure activities
- Provision for certification by the owner-operator
- Provision for certification by the independent registered engineer

3.9 Post-Closure Care

Regulated container storage units are not subject to post-closure requirements in 40 CFR 264, Subpart G; therefore, no post-closure care is anticipated for the facility. The HWPF will be decontaminated and all hazardous waste and hazardous waste residues will be removed at the time of closure.

4 PLAN AMENDMENTS [40 CFR 267.112(c)]

In the event that operating plans, facility design, or the approved closure plan change during operation of the permitted RCRA facility, a written request for a permit modification will be submitted to EPA at least 60 days prior to implementing the change. At the time the written notice of final closure is submitted, BPXA anticipates submitting an amendment or revised closure plan that provides detailed descriptions of closure operations.

5 SCHEDULE

5.1 Notification of Final Closure [40 CFR 267.112(d)]

Regulatory agencies will be informed of BPXA's intent to close the facility at least 45 days before closure activities are initiated, by the submittal of a written notification of final closure. This notification will be sent to EPA Region 10, the Alaska Department of Natural Resources, and the Alaska Department of Environmental Conservation.

5.2 Closure Schedule [40 CFR 267.112(b)(6)]

The exact time of closure is currently unknown, but BPXA does not anticipate closing the storage unit during the initial 10-year term of the permit. When closure does take place, the following estimated schedule will be followed (Day 0 is the last day that waste is accepted at the facility):

Day	Activity
-45	Submit the written notification of final closure
0	No further wastes or hazardous materials are accepted at HWPF, and closure activities are initiated
30	If delayed, closure activities are initiated by this date.
90	All hazardous waste are shipped off-site and hazardous residues decontaminated by this date
120	Complete closure activities, including confirmation sampling
180	Certification of closure

Extensions of Closure Schedule [40 CFR 267.115]

If an extension of up to 180 days is necessary to achieve final closure (i.e., if final closure will not be completed within 180 days of the final volume of hazardous waste being accepted at the HWPF), a petition will be filed with EPA Region 10. This notice will be sent at least 30 days prior to the expiration of the initial 180 day period. To justify an extension or an amendment of the closure schedule presented above, BPXA will demonstrate the need for more than 180 days to implement final closure due to circumstances beyond BPXA’s control and steps that have and will continue to be taken to prevent threats to human health and the environment from the unclosed but inactive facility. For example, BPXA may need to request an extension to accommodate the seasonal timing of sampling soil or gravel and super-permafrost groundwater under and adjacent to the HWPF (if required) since the gravel pads and porewater in the Prudhoe Bay facility only thaw between June and September.

6. CLOSURE COST ESTIMATE

An estimate of the costs associated with closure of HWPF is provided in Table 5. BPXA has demonstrated its eligibility for corporate guarantee of financial assurance based on the financial test specified in 40 CFR 267.143(g).

The cost estimate is based on BPXA hiring a third party to close the HWPF storage unit at the point in the unit’s life when the extent and manner of its operation would make closure the most expensive. No salvage value was assumed for equipment or materials. This closure cost estimate also includes a 50% contingency to account for wide variation in the actual inventory of waste stored, types of waste stored and their distinct disposal costs, variation in decontamination and removal technique, sampling and analysis methodology and technique, the volume of decontaminated or contaminated equipment and other solid waste that is generated as a result of closure activities, and variation in personnel or labor rates.

During the active life of the facility, the closure cost estimate will be updated for inflation within 30 days after the close of BPXA's fiscal year and before submission of annual

updated financial assurance documentation to the EPA Region 10 Regional Administrator required in 40 CFR 267.143 [40 CFR 267.142(b)]. In addition, if this plan is modified during the active life of the facility, a revised closure cost estimate will be completed no later than 30 days after the Regional Administrator has approved the request to modify the closure plan, if the change in the closure plan increases the cost of closure [40 CFR 267.142(c)]. The closure plan itself will not be revised for each annual adjustment, but rather it will be reflected in the corporate guarantee BPXA provides annually to EPA for financial assurance under 40 CFR 267, Subpart H. The financial assurances are mailed to the EPA Regional Administrator at the end of March of each calendar year. The most recent closure cost estimates are also included in the Biennial Reports submitted to EPA by March 1 of each even numbered year. A copy of the latest adjusted closure cost estimate will be kept at the facility as required in 40 CFR 267.142(d).

Tables and Figures

Table 1: Draft Tier 1 Screening Levels
(submitted for Prudhoe Bay Facility, Alaska, Administrative Order on
Consent RCRA 10-10-2007-0222)

COPC	Regulatory Agency		Tier 1 SLs			
			Soil (mg/kg)		Water (ug/L)	
	RCRA	ADEC	Human Health	Ecological	Human Health	Ecological
<u>Volatiles</u>						
1,1,1-Trichloroethane	x	x	460	15	200	11
1,1-Dichloroethane	x	x	85	15	1,200	47
1,1-Dichloroethylene	x	x	1.3	0.3	7.0	25
1,2-Dichloroethane	x	x	0.35	4	0.38	100
1,4-Dioxane	x	x	44	3.7	6.1	4,000
2-Butanone (methyl ethyl ketone)	x	x	3,200	35	7,100	14,000
4-Methyl-2-Pentanone (MIBK)	x	x	5,800	92	2,000	170
Acetone	x	x	1,400	20	3,650	1,500
Benzene	x	x	0.66	0.0068	2.2	21
Chlorobenzene	x	x	27	0.1	100	1.3
Chloroethane ^a	x	x	11	10	190	55,000
cis-1,2-Dichloroethylene	x	x	4.3	1	70	590
Ethylbenzene	x	x	23	0.02	530	7.3
Formaldehyde	x		11	0.1	1.5	50
Isopropylbenzene		x	585	NA	3,650	NA
Tetrachloroethylene (PCE)	x	x	0.6	0.1	0.69	84
Toluene	x	x	52	0.08	1,000	2.0
Xylenes	x	x	21	0.10	200	13
trans-1,2-Dichloroethylene	x	x	120	1	100	590
Trichlorethylene (TCE)	x	x	0.04	0.10	2.5	47
Trichlorofluoromethane	x	x	39	16	1,300	1,740
Vinyl chloride	x	x	0.04	0.10	0.03	1,300
Methanol		x	31,000	30	18,000	384,000
2,4-Dimethylphenol	x	x	120	20	380	21
2-Methylnaphthalene	x	x	2,740	3.2	780	130
2-Methylphenol (o-Cresol)	x	x	6,800	50	1,800	13
4-Methylphenol (p-Cresol)	x	x	31	163	180	25
Acenaphthene	x	x	370	20	20	5.8
Anthracene	x	x	2,200	1.6	8,300	0.01

(continued)

Table 1 (Continued)

COPC	Regulatory Agency		Tier 1 SLs			
	RCRA	ADEC	Soil (mg/kg)		Water (ug/L)	
			Human Health	Ecological	Human Health	Ecological
<u>Semi-Volatiles</u>						
Benzo(a)anthracene	x	x	0.15	0.1	0.0038	0.02
Benzo(a)pyrene	x	x	0.015	0.10	0.0038	0.01
Benzo(b)fluoranthene	x	x	0.15	0.1	0.0038	9.07
Benzo(g,h,i)perylene	x	x	4,100	33	1100	7.64
Benzo(k)fluoranthene ^b	x	x	1.5	0.1	0.0038	9.07
Chrysene	x	x	15	35	0.0038	7.0
Dibenzo(a,h)anthracene	x	x	0.015	0.1	0.0038	0.03
Di-n-butylphthalate	x	x	610	0.91	2,000	3.0
Fluoranthene	x	x	230	260	130	0.04
Fluorene	x	x	2,600	30	1,100	3.0
Indeno(1,2,3-cd)pyrene	x	x	0.15	0.1	0.0038	4.3
m-Cresol ^c	x	x	31	3.5	180	62
Naphthalene	x	x	12	0.1	6.2	1.1
Phenanthrene	x	x	41,000	0.1	11,000	0.4
Phenol	x	x	1,800	3.8	21,000	110
Pyrene	x	x	230	0.1	830	0.03
<u>Metals</u>						
Antimony		x	3.1	0.27	5.6	30
Arsenic	x	x	7.48	7.48	0.98	150
Barium	x	x	1,600	189	1,000	91
Cadmium	x	x	3.9	0.33	5.0	0.25
Chromium III			10,000	26	100	74
Chromium VI			30	81	100	11
Total Chromium	x	x	210	64	100	1.1
Copper	x	x	290	19	1,300	9.0
Lead	x	x	400	11	15	2.5
Mercury	x	x	2.3	0.3	2	0.8
Nickel	x	x	160	30	100	52
Selenium	x	x	39	0.52	50	5.0
Vanadium	x	x	39	8.0	180	19
Zinc	x	x	2,300	59	5,000	120
<u>Inorganics</u>						
Chloride		x	NA	NA	250,000	230,000
Sulfate		x	NA	NA	250,000	NA
<u>Glycols</u>						
Ethylene glycol		x	10,000	100	73,000	192,000
Propylene glycol ^d		x	3,003	100	18,000	500,000
Triethylene glycol ^e		x	10,000	100	73,000	192,000

(abbreviations and footnotes on following page)

TABLE 1

Abbreviations

ADEC = Alaska Department of Environmental Conservation

COPC = Constituent of Potential Concern

EPA = United States Environmental Protection Agency

NA = Not available/applicable

RCRA = Resource Conservation and Recovery Act

mg/kg = milligrams per kilogram

ug/L = micrograms per liter

Footnotes:

a Values for chloromethane used based on structural similarity.

b Ecological water value for benzo(b)fluoranthene used based on structural similarity.

c Human health values for p-cresol used based on structural similarity.

d Ecological soil value for ethylene glycol used based on structural similarity.

e Values for ethylene glycol used based on structural similarity.

Table 2 Samples

Media	Type of Samples	Number of Samples	Purpose of Sampling
Hazardous waste container contents	Grab sample	222	Profiling for waste characterization
Decontamination rinsate	Composite sample	6	Profiling for waste characterization
Solid residue from decontamination	Grab sample	6	Profiling for waste characterization
HWPF walls, floors, and equipment surfaces	Wipe samples	32	Confirmation of decontamination
Background wipe samples	Wipe samples	2	Comparison to decontaminated surfaces
Field QC samples Blank and side-by-side duplicate	Wipe samples	2	Confirmation of clean wipe material for blanks and determine potential differences in contamination of surface areas

Table 3 Analytical Methods, Handling and Rationale for Analyses

Analysis and Method	Recommended Container	Preservative	Holding Time	Rationale
Ignitability (flash point) 1010A (Pensky-Martens closed cup) 1020A (Setaflash closed cup)	250 ml glass, Teflon-lined cap	Chill to 4°C	7 Days	Hazardous waste determination for disposal of HWPF onsite waste inventory (liquids) and closure decontamination rinsate.
Corrosivity (pH) 9040C (Electronic meter) 9045D (Soil and waste pH)	250 ml polyethylene/glass	None	Field analysis: As soon as possible Lab analysis: 24 hours	Hazardous waste determination for disposal of HWPF onsite waste inventory and closure decontamination rinsate.
Reactivity Generator knowledge (See Exhibit 7B)				Hazardous waste determination for disposal of HWPF onsite waste inventory.
Toxicity Characteristic Leaching Procedure (TCLP) Extraction 1311	See below	See below	See below	Hazardous waste determination for disposal of HWPF onsite waste inventory and closure decontamination waste.
TCLP Metals 6010/6020 or 7000 series 7470 (Mercury: aqueous) 7471 (Mercury: soil/solid) Arsenic. Barium Cadmium Lead Mercury Selenium Silver Chromium	Aqueous: 1000 mL plastic Soil/Solid: 8-oz. wide mouth jar	Cool to ≤6°	TCLP extraction within: 180 days except mercury (28 days) Prep and Analysis of TCLP leachate within: 180 days except mercury (28 days) Total days 56 for mercury, 360 days for metals	Hazardous waste determination for disposal of HWPF onsite waste inventory and closure decontamination waste.
Total Metals 6010/6020 or 7000 series 7470 (Mercury: aqueous) 7471 (Mercury: soil/solid)	Aqueous: 500 mL plastic	HNO ₃ to pH≤2; Cool to ≤6°C or ambient	180 days except mercury (28 days)	Verification samples, including wipe samples, to document closure performance standards were met, including wipe samples.
	Soil/Solid: 8-oz. wide mouth jar	Cool to ≤6°C		
TCLP and Total Volatile Organics 8260B or equivalent (aqueous) 5035/8260B (soil/solid) Note: TCLP volatiles may require larger volumes of sample in the event of low percent solids	Aqueous: 40 ml VOA vials with septa, no headspace	Aqueous: HCL to pH<2 (unless analyzed within 7 days), Cool to ≤6°C	Totals: 14 days	TCLP analyses: Hazardous waste determination for disposal of HWPF onsite inventory and decontamination waste. Total analyses: verification samples to document closure performance standards are met, excluding wipe samples.
	TCLP Soil/Solid: 8-oz. wide mouth jar	Cool to ≤6°C	TCLP Extraction of sample within 14 days Analysis of TCLP leachate: 14 days (total 28 days)	
	Soil/Solid: Tared 40 ml VOA with 5 ml DI water, 5 grams sample for each vial	Soil/Solid: Cool to ≤6°C in field, frozen to ≤10°C at laboratory	Totals: 14 days	

Analysis and Method	Recommended Container	Preservative	Holding Time	Rationale
Polychlorinated Biphenyls (PCBs) 8082	Aqueous: 1 liter amber glass; Teflon-lined cap	Chill to $\leq 6^{\circ}\text{C}$	Extract within 7 days, analyze within 40 days of extraction	Total analyses: Verification samples to document closure performance standards
	Soil/Solid: 8-oz. amber wide-mouth jar		Extract within 14 days, analyze within 40 days of extraction	
TCLP and Total Semi-volatile Organics 8270C	Aqueous: 1 liter amber glass, Teflon-lined cap Soil/Solid: 8-oz. amber wide-mouth jar	Chill to $\leq 6^{\circ}\text{C}$	TCLP Extraction within: 14 days, Preparation of TCLP Extract within 7 days, analyze within 40 days of extraction (61 total days) Aqueous Totals: 7 days to extraction, 40 days to analysis Soil/Solid Totals: 14 days to extraction, 40 days to analysis	TCLP analyses: Hazardous waste determination for disposal of HWPF onsite waste inventory, decontamination rinsate. Total analyses: verification samples to document closure performance standards are met, including wipe samples
WIPE SAMPLES				
Total Semi-volatile Organics 8270C	Premoistened 2"x2" gauze pad and methanol returned in 2-oz. glass jar	None	14 days to extraction, 40 days to analysis	Total analyses: Verification samples to document closure performance standards
Polychlorinated Biphenyls (PCBs) 8082	Premoistened 2"x2" gauze pad and hexane returned in 2-oz. glass jar	None	14 days to extraction, 40 days to analysis	Total analyses: Verification samples to document closure performance standards
Total Metals 6010/6020 7471 (Mercury: soil/solids)	"Ghost Wipes" premoistened with deionized water and a plastic vessel for storage	None	180 days, except mercury (28 days)	Total analyses: Verification samples to document closure performance standards

See *Quality Assurance Project Plan For Administrative Order for Corrective Action Under Section 3008(h) of the Resource Conservation and Recovery Act (RCRA) – BPXA's Prudhoe Bay Facility, Environmental Protection Agency ID No AKD 000643239, EPA Docket No.: RCRA-10-2007-0222, October 3, 2007* for additional sample handling and analytical methods requirements, including matrix QC samples (e.g., MS, MSD, and/or laboratory duplicate samples, trip samples for volatiles).

**Table 4 Maximum Concentrations of Contaminants
for the Toxicity Characteristic**

As determined by Toxicity Characteristic Leaching Procedure [40 CFR 261.24]

Contaminant	Maximum concentration (mg/L)	Contaminant	Maximum concentration (mg/L)
<u>TCLP Metals</u>		<u>TCLP Semi-Volatiles</u>	
Arsenic	5.0	o-Cresol	200.0*
Barium	100.0	m, p-Cresol	200.0*
Cadmium	1.0	m, p-Cresol	200.0*
Chromium	5.0	Cresol (total)	200.0*
Lead	5.0	2,4-Dinitrotoluene	0.13**
Mercury	0.2	Hexachlorobenzene	0.13**
Selenium	1.0	Hexachlorobutadiene	0.5
Silver	5.0	Hexachloroethane	3.0
		Nitrobenzene	2.0
<u>TCLP Volatiles</u>		Pentachlorophenol	100.0
Benzene	0.5	Pyridine	5.0**
Carbon tetrachloride	0.5	2,4,5-Trichlorophenol	400.0
Chlorobenzene	100.0	2,4,6-Trichlorophenol	2.0
Chloroform	6.0		
1,4-Dichlorobenzene	7.5		
1,2-Dichloroethane	0.5		
1,1-Dichloroethylene	0.7		
Methyl ethyl ketone	200.0		
Tetrachloroethylene	0.7		
Trichloroethylene	0.5		
Vinyl chloride*	0.2		

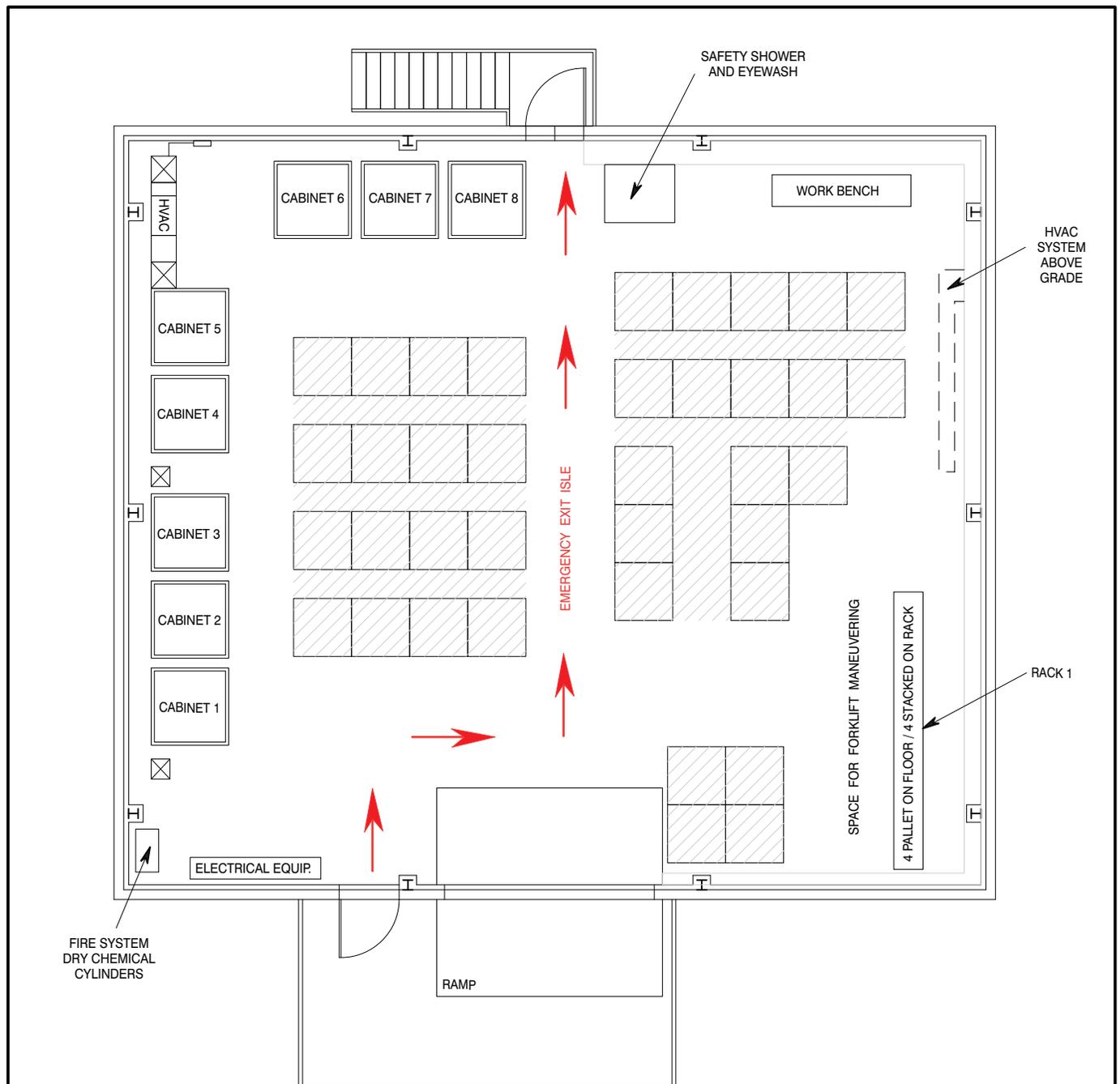
* If o-, m-, and p-cresol concentrations cannot be differentiated, the total cresol concentration is used.

** Method quantitation limit is higher than regulatory limit. Use quantitation limit as maximum allowable level.

Note: Pesticides and herbicides are not used or expected to be present at BPXA; therefore, no testing for TCLP Pesticides/Herbicides is included.

Table 5 Closure Cost Estimate**June 2009 Costs**

	Rate	Units	No	Cost
Task 1 Record Review, Closure, QAPP and HSE Plan Prep, Agency Meetings	\$150	hour	191	\$28,650
Task 2 Inventory Disposal (max inventory, 444 drums including bulbs/lamps)				\$385,880
Drum Sampling, Pkg, Labeling	\$62	hour	320	\$19,840
Profile & Laboratory Analysis	\$500	drum	222	\$111,000
Shipping from Prudhoe to Anchorage	\$5,500	truck	10	\$55,000
Chlorinated Solvent/ Waste Oil Disposal	\$350	drum	40	\$14,000
Lamp/Bulb Disposal (containing lead and mercury)	\$485	drum	52	\$25,220
Mercury-contaminated waste	\$4,125	drum	10	\$41,250
Flammables and Off-Spec Oil Disposal (passes on halogens)	\$133	drum	266	\$35,378
Lab packs and medical waste	\$490	drum	20	\$9,800
Aqueous Acid/Base/Metals Disposal	\$377	drum	56	\$21,112
Shipping from Anchorage to Seattle	\$120	drum	444	\$53,280
Task 3 Facility Decontamination/Removal				\$36,720
3.1 Dismantle and clean equipment				
Technicians	\$62	hour	80	\$4,960
Heavy Equipment	\$300	hour	40	\$12,000
3.2 Haul equipment to Fairbanks	\$2,500	truck	4	\$10,000
3.3 Landfill disposal charge	\$122	yard	80	\$9,760
Task 4 Sampling and Analysis				\$125,200
4.1 Sample collection				
Labor	\$62	hour	100	\$6,200
Consumables				\$2,000
4.2 Analytical Testing	\$1,500	sample	70	\$105,000
4.3 Analysis Evaluation/Recommendations	\$150	hour	80	\$12,000
Task 5 Disposal of Decontamination Wastes				\$13,080
5.1 Decontamination Solids Disposal	\$150	drum	8	\$1,200
5.2 Decontamination Rinsate Disposal	\$120	drum	20	\$2,400
5.3 Drum Profiling, Pkg, Labeling	\$62	hour	10	\$620
5.5 Shipping from Prudhoe to Anchorage	\$5,500	truck	1	\$5,500
5.6 Shipping from Anchorage to Seattle	\$120	drum	28	\$3,360
Task 6 Closure Certification by Engineer	\$150	hour	200	\$30,000
Tasks 1-6 Contractor Travel and Per Diem				\$13,350
Travel: Round trip Anchorage-Deadhorse	\$825	trip	8	\$6,600
Per Diem: Deadhorse lodging	\$150	night	45	\$6,750
Task 7 50% Contingency				\$316,440
TOTAL ESTIMATED CLOSURE COSTS:				\$949,320



LEGEND:



ADDITIONAL STORAGE OR
PROCESSING WORK AREA

NOTES:

1. FLOOR PLAN SHOWN IS HYPOTHETICAL FOR MAXIMUM STORAGE QUANTITY ESTIMATION. STORAGE AND PROCESSING WILL BE ARRANGED WITHIN THE WORK AREA TO MEET THE FOLLOWING CONSTRAINTS.

a. MINIMUM ISLE SPACE OF 3 FEET WILL BE PROVIDED AT ALL TIMES

2. DRUMS WITHIN THE WORK AREA MAY BE DOUBLE-STACKED, EXCEPT FOR THE CLASS 1 FLAMMABLES.

3. ALL CABINETS ARE SUITABLE FOR EITHER HYDROCARBON OR CORROSIVES STORAGE.

4. SQUARES IN THE CENTER WORK AREA REPRESENT PALLETS.

5. THERE IS RACK STORAGE SPACE FOR 13 BOXES OR 52 DRUMS OF LIGHT BULBS ABOVE CABINETS 1-8.

BP EXPLORATION (ALASKA) INC.

**HAZARDOUS WASTE PROCESS FACILITY
FLOOR PLAN**

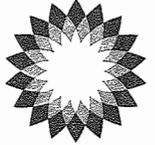
DATE:
June 2009

SCALE:
NOT TO SCALE

FIGURE:
1

Section 8

Demonstration of Financial Assurance [40 CFR 270.275 (h)]



Mary Ellen Perkins
Senior Paralegal
BP Legal

BP America Inc.

4101 Winfield Road
Mail Code 4 West
Warrenville, Illinois 60555

Direct: 630-821-2267
Fax: 630-821-3406
PerkinM1@bp.com

March 27, 2009

Ms. Michelle Pirzadeh
Acting Regional Administrator
U.S. Environmental Protection Agency Region 10
1200 Sixth Avenue, Suite 900
Mail Code RA-140
Seattle, WA 98101

RE: BP Exploration (Alaska) Inc. – Prudhoe Bay, Milne Point, Badami, Endicott and Northstar
Financial Assurance Documents – Class I Non-Hazardous Underground Injection Control Wells,
and Hazardous Waste Management Facility

Dear Ms. Pirzadeh:

Attached are the financial assurance documents for BP Exploration (Alaska) Inc.'s Prudhoe Bay, Milne Point, Badami, Endicott and Northstar sites.

The following documents are included supporting any financial guarantees:

- Letter from the Chief Financial Officer
- Corporate Guarantee for Closure or Post-Closure Care
- Guarantee for Liability Coverage
- Attachment supporting sum of current cost estimates guaranteed by BP Corporation North America Inc.
- 2008 audited financial statement for BP Corporation North America Inc.
- Special Report from Ernst & Young LLP

If you have any questions regarding the information submitted, please contact Colleen Burgh at (907) 564-5229.

Sincerely,

Mary Ellen Perkins

Enclosures
cc: C. Burgh

Letter From Chief Financial Officer

Ms. Michelle Pirzadeh
Acting Regional Administrator
U.S. Environmental Protection Agency Region 10
1200 Sixth Avenue, Suite 900
Mail Code RA-140
Seattle, WA 98101

Re: BP Exploration (Alaska), Inc. Prudhoe Bay, Milne Point, Badami, Endicott, and Northstar Proof of Financial Responsibility for Class I Non-hazardous Underground Injection Control Wells and for a Hazardous Waste Management Facility

I am the chief financial officer of BP Corporation North America Inc. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure or corrective action as specified in subpart H of 40 CFR parts 264 and 265.

The firm identified above is the owner or operator of the following facilities for which liability coverage for both sudden and nonsudden accidental occurrences is being demonstrated through the financial test specified in subpart H of 40 CFR parts 264 and 265: **None**

The firm identified above guarantees, through the guarantee specified in subpart H of 40 CFR parts 264 and 265, liability coverage for both sudden and nonsudden accidental occurrences at the following facilities, located in the State of Alaska, owned or operated by the following:

AKD000643239
BP Exploration (Alaska) Inc.
Prudhoe Bay Unit
P. O. Box 196612
Anchorage, Alaska 99519-6612

The firm identified above is owned by the same parent corporation as the parent corporation of the owner or operator, and receiving valuable consideration for this guarantee based on the firm's margin for affiliate company loans and guarantees.

1. The firm identified above owns or operates the following facilities, in the State of Alaska, for which financial assurance for closure or post-closure care or corrective action or liability coverage is demonstrated through the financial test specified in subpart H of 40 CFR parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: **None**
2. The firm identified above guarantees, through the guarantee specified in subpart H of 40 CFR parts 264 and 265, the closure and post-closure care or corrective action or liability coverage of the following facilities owned or operated by the guaranteed party. The current cost estimates for closure or post-closure care so guaranteed are shown for each facility: **(See Attachment 2 which includes but is not limited to)**

Facility Name and Address	EPA I.D. Number	Current Closure	Current Post Closure
BP Exploration (Alaska) Inc. Prudhoe Bay Unit P. O. Box 196612 Anchorage, Alaska 99519-6612	AKD000643239	\$ 949,320	\$ -0-

3. In States where EPA is not administering the financial requirements of subpart H of 40 CFR parts 264 and 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance

for the closure or post-closure care or corrective action of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in subpart H of 40 CFR parts 264 and 265. The current closure or post-closure cost estimates covered by such a test are shown for each facility: **\$318,415,889 (See Attachments 3 and 8)**

4. The firm identified above owns or operates of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care or corrective action, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanisms specified in subpart H of 40 CFR parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: **None**
5. This firm is the owner or operator or guarantor of the following UIC facilities [and other facilities] for which financial assurance for plugging and abandonment [and for other purposes] is required under part 144 [and other regulations] and is assured through a financial test. The current closure cost estimates as required by 40 CFR 144.62 [and other regulations] are shown for each facility: **\$26,970,411 (See Attachments 4.A, 4.B and 5)**

In accordance with Section XXVII, paragraph 132.B. of the October 3, 2007 *Administrative Order for Corrective Action under RCRA Section 3008(h), BPXA Prudhoe Bay Facility, EPA ID No. AKD 000643239*, BPXA will prepare and submit to the EPA Region 10 an initial estimated cost to complete the work required under the Order. This cost estimate will include revised estimated costs for the future closure of Prudhoe Bay Unit non-hazardous waste facilities (included in Attachment 3) and work at the Prudhoe Bay Unit Former Tuboscope Site (included in Attachment 7). The cost estimate will be submitted to the EPA within thirty (30) days after EPA's approval of Part III of the Site-Wide Project Work Plan, which was submitted to the EPA on June 28, 2008.

Attachment 2 includes a revised cost estimate for the Prudhoe Bay Unit Hazardous Waste Storage Facility (AKD000634239) that was developed for a January 2009 RCRA Closure Plan. Updated cost estimates for other Alaska facilities were calculated using an inflation factor derived from the most recent Implicit Price Deflator published by the U.S. Department of Commerce.

This firm is not required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on December 31st. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 2008.

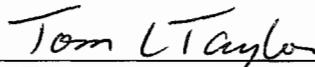
Part B. Closure, Post Closure, Corrective Action, and Liability Coverage

Alternative II

1.	Sum of current closure, post closure, and corrective action cost estimates (total of all cost estimates listed above)	\$681,371,384
2.	Amount of annual aggregate liability coverage to be demonstrated	\$10,000,000
3.	Sum of lines 1 and 2	\$691,371,384
4.	Current bond rating of most recent issuance and name of rating service	AA Standard and Poor's
5.	Date of issuance of bond	June 4, 2003
6.	Date of maturity of bond	June 15, 2018

- | | | |
|------|---|-------------------|
| *7. | Tangible net worth (if any portion of the current cost estimates is included in "total liabilities" on your financial statements you may add that portion to this line) | \$69,350,000,000 |
| *8. | Total assets in the U.S. (Required only if less than 90% of assets are located in the U.S.) | \$142,824,000,000 |
| 9. | Is line 7 at least \$10 million? | Yes |
| 10. | Is line 7 at least 6 times line 3? | Yes |
| *11. | Are at least 90% of assets located in the U.S.? If not, complete line 12. | No |
| 12. | Is line 8 at least 6 times line 3? | Yes |

I hereby certify that the wording of this letter is substantially identical to the wording specified in 40 CFR 264.151(g), as incorporated by reference in the Alaska Administrative Code Title 18, Chapters 60, 62, 72 and 78 as such regulations were constituted on the date shown immediately below.



Tom L. Taylor
Chief Financial Officer

March 23, 2009
Date

Cc mailing list:

Colleen Burgh
BP Exploration (Alaska) Inc.
P.O. Box 196612
Anchorage, AK 99519-6612

Thor Cutler
U.S. Environmental Protection Agency Region 10
1200 Sixth Avenue, Suite 900
Mail Code OCE-082
Seattle, WA 98101

Robbie Hedeem
U.S. Environmental Protection Agency Region 10
1200 Sixth Avenue, Suite 900
Mail Code AWT-121
Seattle, WA 98101

Corporate Guarantee for Closure or Post-Closure Care

Guarantee made this 23rd day of March, 2009 by BP Corporation North America Inc., a business corporation organized under the laws of the State of Indiana, herein referred to as guarantor. This guarantee is made on behalf of the BP Exploration (Alaska) Inc. of 900 E. Benson Boulevard, Anchorage, Alaska 99508, which is our subsidiary to the United States Environmental Protection Agency (EPA).

Recitals

1. Guarantor meets or exceeds the financial test criteria and agrees to comply with the reporting requirements for guarantors as specified in 40 CFR 264.143(f), 264.145(f), 265.143(e), and 265.145(e).
2. BP Exploration (Alaska) Inc. owns or operates the following hazardous waste management facility covered by this guarantee:

AKD000643239
Guarantee for Closure
Prudhoe Bay Unit
P.O. Box 196612
Anchorage, Alaska 99519-6612
3. "Closure plans" and "post-closure plans" as used below refer to the plans maintained as required by subpart G of 40 CFR parts 264 and 265 for the closure and post-closure care of facilities as identified above.
4. For value received from BP Exploration (Alaska) Inc., guarantor guarantees to the EPA that in the event that BP Exploration (Alaska) Inc. fails to perform closure care of the above facility in accordance with the closure or post-closure plans and other permit or interim status requirements whenever required to do so, the guarantor shall do so or establish a trust fund as specified in subpart H of 40 CFR part 264 or 265, as applicable, in the name of BP Exploration (Alaska) Inc. in the amount of the current closure or post-closure cost estimates as specified in subpart H of 40 CFR parts 264 and 265.
5. Guarantor agrees that if, at the end of any fiscal year before termination of this guarantee, the guarantor fails to meet the financial test criteria, guarantor shall send within 90 days, by certified mail, notice to the EPA Regional Administrator for the Region in which the facility is located and to BP Exploration (Alaska) Inc. that he intends to provide alternate financial assurance as specified in subpart H of 40 CFR parts 264 and 265, as applicable, in the name of BP Exploration (Alaska) Inc. Within 120 days after the end of such fiscal year, the guarantor shall establish such financial assurance unless BP Exploration (Alaska) Inc. has done so.
6. The guarantor agrees to notify the EPA Regional Administrator by certified mail, of a voluntary or involuntary proceeding under Title 11 (Bankruptcy), U.S. Code, naming guarantor as debtor, within 10 days after commencement of the proceeding.
7. Guarantor agrees that within 30 days after being notified by the EPA Regional Administrator of a determination that guarantor no longer meets the financial test criteria or that he is disallowed from continuing as a guarantor of closure or post-closure care, he shall establish alternate financial assurance as specified in subpart H of 40 CFR part 264 or 265, as applicable, in the name of BP Exploration (Alaska) Inc. unless BP Exploration (Alaska) Inc. has done so.
8. Guarantor agrees to remain bound under this guarantee notwithstanding any or all of the following: amendment or modification of the closure or post-closure plan, amendment or modification of the permit, the extension or reduction of the time of performance of closure or post-closure, or any

other modification or alteration of an obligation of the owner or operator pursuant to 40 CFR part 264 or 265.

9. Guarantor agrees to remain bound under this guarantee for as long as BP Exploration (Alaska) Inc. must comply with the applicable financial assurance requirements of subpart H of 40 CFR parts 264 and 265 for the above-listed facilities, except as provided in paragraph 10 of this agreement.
10. Guarantor may terminate this guarantee by sending notice by certified mail to the EPA Regional Administrator for the Region in which the facility is located and to BP Exploration (Alaska) Inc., provided that this guarantee may not be terminated unless and until BP Exploration (Alaska) Inc. obtains, and the EPA Regional Administrator approves, alternate closure and/or post-closure care coverage complying with 40 CFR 264.143, 264.145, 265.143, and/or 265.145.
11. Guarantor agrees that if BP Exploration (Alaska) Inc. fails to provide alternate financial assurance as specified in subpart H of 40 CFR part 264 or 265, as applicable, and obtain written approval of such assurance from the EPA Regional Administrator within 90 days after a notice of cancellation by the guarantor is received by an EPA Regional Administrator from guarantor, guarantor shall provide such alternate financial assurance in the name of BP Exploration (Alaska) Inc.
12. Guarantor expressly waives notice of acceptance of this guarantee by the EPA or by BP Exploration (Alaska) Inc. Guarantor also expressly waives notice of amendments or modifications of the closure and/or post-closure plan and of amendments or modifications of the facility permit.

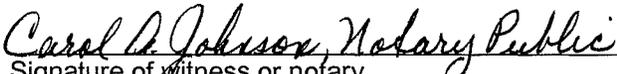
I hereby certify that the wording of this guarantee is identical to the wording specified in 40 CFR 264.151(h), as incorporated by reference in the Alaska Administrative Code Chapters 60, 62, 72 and 78 as such regulations were constituted on the date first above written.

Effective Date: March 23, 2009

BP Corporation North America Inc.



Tom L. Taylor
Chief Financial Officer



Signature of witness or notary
Commission expires: 1-27-2011

Guarantee for Liability Coverage

Guarantee made this 28th of March, 2008 by BP Corporation North America Inc., a business corporation organized under the laws of the State of Indiana, herein referred to as guarantor. This guarantee is made on behalf of BP Exploration (Alaska) Inc. of 900 E. Benson Boulevard, Anchorage, Alaska 99508, which is our subsidiary, to any and all third parties who have sustained or may sustain bodily injury or property damage caused by sudden and/or nonsudden accidental occurrences arising from operation of the facility covered by this guarantee.

Recitals

1. Guarantor meets or exceeds the financial test criteria and agrees to comply with the reporting requirements for guarantors as specified in 40 CFR 264.147(g) and 265.147(g).
2. BP Exploration (Alaska) Inc. owns or operates the following hazardous waste management facility covered by this guarantee:

AKD000643239
Prudhoe Bay Unit
P.O. Box 196612
Anchorage, Alaska 99519-6612

This corporate guarantee satisfies RCRA third-party liability requirements for both sudden and nonsudden accidental occurrences in above-named owner or operator facilities for coverage in the amount of \$5,000,000 for each occurrence and \$10,000,000 annual aggregate.

3. For value received from BP Exploration (Alaska) Inc., guarantor guarantees to any and all third parties who have sustained or may sustain bodily injury or property damage caused by sudden and/or nonsudden accidental occurrences arising from operations of the facility covered by this guarantee that in the event that BP Exploration (Alaska) Inc. fails to satisfy a judgment or award based on a determination of liability for bodily injury or property damage to third parties caused by sudden and/or nonsudden accidental occurrences, arising from the operation of the above-named facilities, or fails to pay an amount agreed to in settlement of a claim arising from or alleged to arise from such injury or damage, the guarantor will satisfy such judgment(s), award(s) or settlement agreement(s) up to the limits of coverage identified above.
4. Such obligation does not apply to any of the following:
 - (a) Bodily injury or property damage for which BP Exploration (Alaska) Inc. is obligated to pay damages by reason of the assumption of liability in a contract or agreement. This exclusion does not apply to liability for damages that BP Exploration (Alaska) Inc. would be obligated to pay in the absence of the contract or agreement.
 - (b) Any obligation of BP Exploration (Alaska) Inc. under a workers' compensation, disability benefits, or unemployment compensation law or any similar law.
 - (c) Bodily injury to:
 - (1) An employee of BP Exploration (Alaska) Inc. arising from, and in the course of, employment by BP Exploration (Alaska) Inc.; or
 - (2) The spouse, child, parent, brother, or sister of that employee as a consequence of, or arising from, and in the course of employment by BP Exploration (Alaska) Inc.

This exclusion applies:

- (A) Whether BP Exploration (Alaska) Inc. may be liable as an employer or in any other capacity; and
 - (B) To any obligation to share damages with or repay another person who must pay damages because of the injury to persons identified in paragraphs (1) and (2).
- (d) Bodily injury or property damage arising out of the ownership, maintenance, use, or entrustment to others of any aircraft, motor vehicle or watercraft.
- (e) Property damage to:
- (1) Any property owned, rented, or occupied by BP Exploration (Alaska) Inc.;
 - (2) Premises that are sold, given away or abandoned by BP Exploration (Alaska) Inc. if the property damage arises out of any part of those premises;
 - (3) Property loaned to BP Exploration (Alaska) Inc.;
 - (4) Personal property in the care, custody or control of BP Exploration (Alaska) Inc.;
 - (5) That particular part of real property on which BP Exploration (Alaska) Inc. or any contractors or subcontractors working directly or indirectly on behalf of BP Exploration (Alaska) Inc. are performing operations, if the property damage arises out of these operations.
5. Guarantor agrees that if, at the end of any fiscal year before termination of this guarantee, the guarantor fails to meet the financial test criteria, guarantor shall send within 90 days, by certified mail, notice to the EPA Regional Administrator for the Region in which the facility is located and to BP Exploration (Alaska) Inc. that he intends to provide alternate liability coverage as specified in 40 CFR 264.147 and 265.147, as applicable, in the name of BP Exploration (Alaska) Inc. Within 120 days after the end of such fiscal year, the guarantor shall establish such liability coverage unless BP Exploration (Alaska) Inc. has done so.
6. The guarantor agrees to notify the EPA Regional Administrator by certified mail of a voluntary or involuntary proceeding under Title 11 (Bankruptcy), U. S. Code, naming guarantor as debtor, within 10 days after commencement of the proceeding.
7. Guarantor agrees that within 30 days after being notified by the EPA Regional Administrator of a determination that guarantor no longer meets the financial test criteria or that he is disallowed from continuing as a guarantor, he shall establish alternate liability coverage as specified in 40 CFR 264.147 or 265.147 in the name of BP Exploration (Alaska) Inc., unless BP Exploration (Alaska) Inc. has done so.
8. Guarantor reserves the right to modify this agreement to take into account amendment or modification of the liability requirements set by 40 CFR 264.147 and 265.147, provided that such modification shall become effective only if the EPA Regional Administrator does not disapprove the modification within 30 days of receipt of notification of the modification.
9. Guarantor agrees to remain bound under this guarantee for so long as BP Exploration (Alaska) Inc. must comply with the applicable requirements of 40 CFR 264.147 and 265.147 for the above-listed facility, except as provided in paragraph 10 of this agreement.
10. Guarantor may terminate this guarantee by sending notice by certified mail to the EPA Regional Administrator and to BP Exploration (Alaska) Inc., provided that this guarantee may not be terminated unless and until BP Exploration (Alaska) Inc. obtains, and the EPA Regional

Administrator approves alternate liability coverage complying with 40 CFR 264.147 and/or 265.147.

11. Guarantor hereby expressly waives notice of acceptance of this guarantee by any party.
12. Guarantor agrees that this guarantee is in addition to and does not affect any other responsibility or liability of the guarantor with respect to the covered facilities.
13. The Guarantor shall satisfy a third-party liability claim only on receipt of one of the following documents:
 - (a) Certification from the Principal and the third-party claimant(s) that the liability claim should be paid. The certification must be worded as follows, except that instructions in brackets are to be replaced with the relevant information and the brackets deleted:

Certification of Valid Claim

The undersigned, as parties [insert Principal] and [insert name and address of third-party claimant(s)], hereby certify that the claim of bodily injury and/or property damage caused by a [sudden or nonsudden] accidental occurrence arising from operating [Principal's] hazardous waste treatment, storage, or disposal facility should be paid in the amount of \$ _____.

[Signatures] _____
Principal _____
[Notary] Date _____
[Signatures] _____
Claimant(s) _____
[Notary] Date _____

- (b) A valid final court order establishing a judgment against the Principal for bodily injury or property damage caused by sudden or nonsudden accidental occurrences arising from the operation of the Principal's facility or group of facilities.
14. In the event of combination of this guarantee with another mechanism to meet liability requirements, this guarantee will be considered primary coverage.

I hereby certify that the wording of the guarantee is identical to the wording specified in 40 CFR 264.151 (h)(2), as incorporated by reference in Alaska Administrative Code Chapters 60, 62, 72 and 78 as such regulations were constituted on the date shown immediately below.

Effective Date: March 23, 2009

BP Corporation North America Inc.

Tom L Taylor
Tom L. Taylor
Chief Financial Officer

Carol A. Johnson, Notary Public
Signature of witness or notary
Commission expires: 1-27-2011

Report of Independent Accountants on Applying Agreed-Upon Procedures

Board of Directors and Management of
BP Corporation North America Inc.

We have performed the procedures enumerated below, which were agreed to by management of BP Corporation North America Inc. (the “Company” – a wholly-owned subsidiary of BP America Inc.) solely to assist management with respect to the use of the financial test to demonstrate financial responsibility for liability coverage and closure, post-closure or corrective action as specified in Subpart H of 40 CFR Parts 264 and 265 (the “Regulations”) as of December 31, 2008. Management of the Company is responsible for determining compliance with the financial test that is presented on the basis specified by the Regulations. It is the Company’s understanding that these procedures are those required by the U.S. Environmental Protection Agency. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of the parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

We have performed the following procedures with respect to Tom L. Taylor’s (Chief Financial Officer) Letter signed March 23, 2009 pertaining to financial assurance sent to the Regional Administrator of the U.S. Environmental Protection Agency, Region 10 (the “Letter”):

1. We obtained the Company’s schedule that calculates tangible net worth as of December 31, 2008. We recomputed the tangible net worth of the Company and agreed amounts included in the calculation with amounts included in or derived from the Company’s audited consolidated financial statements and found such amounts to be in agreement. We compared the dollar amount of tangible net worth as of December 31, 2008, from this schedule to the Letter (item 7) and found it to be in agreement.
2. We compared the dollar amount of total assets in the U.S. as of December 31, 2008, from the Letter (item 8) to the Company’s audited consolidated financial statements and found it to be in agreement.

3. We obtained the Company's schedule that calculates the percentage of total assets in the U.S. as compared to total assets of the Company. We recomputed the percentage of total assets in the U.S. as compared to total assets of the Company based on amounts included in the Company's audited consolidated financial statements. We noted that the resulting percentage of total assets in the U.S. was not at least 90% of total assets of the Company and compared this to management's assertion identified in item 11 of the Letter and found it to be in agreement.

We were not engaged to and did not conduct an examination, the objective of which would be the expression of an opinion on the financial information included in the Letter. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the Board of Directors and Management of BP Corporation North America Inc. and the U.S. Environmental Protection Agency, Region 10 and is not intended to be and should not be used by anyone other than these specified parties.

Ernst + Young LLP

March 25, 2009



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Attachment 1	Liability Coverage for Sudden and Non-Sudden Accidental Occurrence for Hazardous Waste Facilities Owned, Operated or Guaranteed by BP Corporation North America Inc. or Subsidiaries		Pages 2, 3
Attachment 2	Closure and/or Post-Closure Estimates for Hazardous Waste Facilities Owned, Operated or Guaranteed by BP Corporation North America Inc. or Subsidiaries Regulated by EPA or State Administered RCRA Programs	Closure = \$64,875,577 Post Closure = \$102,823,200	Pages 4, 5
Attachment 3	Closure and/or Post-Closure Estimates for Non-Hazardous Waste Facilities Owned, Operated or Guaranteed by BP Corporation North America Inc. or Subsidiaries	Closure = \$18,119,070 Post Closure = \$296,819	Page 6
Attachment 4.A	Closure Cost Estimates for Plugging and Abandonment of Class I Hazardous Waste Injection Wells Owned, Operated or Guaranteed by BP Corporation North America Inc. or Subsidiaries	\$630,394	Page 7
Attachment 4.B	Closure Cost Estimates for Plugging and Abandonment of Class I Non-Hazardous Waste Injection Wells Owned, Operated or Guaranteed by BP Corporation North America Inc. or Subsidiaries	\$22,347,520	Page 8
Attachment 5	Closure Cost Estimates for Plugging and Abandonment of Class II Non-Hazardous Waste Injection Wells Owned, Operated or Guaranteed by BP Corporation North America Inc. or Subsidiaries	\$3,992,497	Page 9, 10
Attachment 6	Financial Assurance for Corrective Action and Third Party Compensation for Underground and Aboveground Storage Tanks Owned, Operated or Guaranteed by BP Corporation North America Inc. or Subsidiaries Regulated by EPA or State Administered Programs	UST Aggregate Limit for all UST incidents combined = \$2,000,000	Page 11
Attachment 7	Liability Coverage and Assurance for Performance of EPA Order or Consent Decree for Facilities Owned, Operated or Guaranteed by BP Corporation North America Inc. or Subsidiaries	\$166,286,307	Pages 12, 13, 14
Attachment 8	Guaranty of Financial Responsibility for Oil Spill Response and Damages	\$300,000,000	Page 15
	TOTAL	\$681,371,384	



Attachment 1

Liability Coverage for Sudden and Non-sudden Accidental Occurrence for Hazardous Waste Facilities Owned, Operated or Guaranteed by BP Corporation North America Inc. or Subsidiaries

Facility Name and Address	EPA I.D. Number	Type(s) of Coverage
BP Products North America Inc. Casper Refinery 2435 King Blvd., Suite 100 Casper, Wyoming 82604	Under WDEQ Remedy Agreement 1/10/2002	Sudden and Non-sudden
BP Products North America Inc. Sugar Creek Refinery 1000 North Sterling Avenue Sugar Creek, Missouri 64054	MOD007161425	Sudden and Non-sudden
BP Products North America Inc. Texas City Refinery 2401 Fifth Avenue South Texas City, Texas 77590	TXD008080533 (Texas Reg. #30139) TXD072181381 (Texas Reg. #34507)	Sudden and Non-sudden Sudden and Non-sudden
BP Products North America Inc. Whiting Refinery 2815 Indianapolis Blvd. Whiting, Indiana 46394	IND000810861 IND074375585	Sudden and Non-sudden
BP Products North America Inc. Wood River Refinery 301 Evans Avenue P. O. Box 182 Wood River, Illinois 62095	ILD980503106 ILD980700967	Sudden and Non-sudden Sudden and Non-sudden
BP Exploration (Alaska) Inc. Prudhoe Bay Unit P. O. Box 196612 Anchorage, Alaska 99519-6612	AKD000643239	Sudden and Non-sudden
BP Products North America Inc. Toledo Refinery 4001 Cedar Point Road Oregon, OH 43616	OHD005057542	Sudden and Non-sudden



Attachment 1 (Continued)

Liability Coverage for Sudden and Non-sudden Accidental Occurrence for Hazardous Waste Facilities Owned, Operated or Guaranteed by BP Corporation North America Inc. or Subsidiaries

Facility Name and Address	EPA I.D. Number	Type(s) of Coverage
BP Products North America Inc. Lima Refinery 1150 S Metcalf Street Lima, Ohio 45804-1145	OHD005051826	Sudden and Non-sudden
BP West Coast Products LLC Carson Refinery 1801 E. Sepulveda Boulevard Carson, California 90749	CAD077227049	Sudden and Non-sudden
BP Products North America Inc. Closed Hazardous Waste Management Facility Salt Lake City Refinery 1700 North 1200 West Salt Lake City, UT 84103	UTD000826370	Sudden and Non-Sudden
BP Amoco Chemical Company Remedial Design & Remedial Action (RD/RA) Joliet Landfill 155 and US Highway 6 Joliet, IL 60434-0941		Sudden and Non-Sudden
BP Amoco Chemical Company Remedial Investigation/Feasibility Study (RI/FS) Joliet Landfill 155 and US Highway 6 Joliet, IL 60434-0941		Sudden and Non-Sudden



Attachment 2

Closure and/or Post-Closure Estimates for Hazardous Waste Facilities
 Owned, Operated or Guaranteed by BP Corporation North America Inc. or Subsidiaries
 Regulated by EPA or State Administered RCRA Programs

Facility Name and Address	EPA I.D. Number	Current Closure	Current Post Closure
BP Products North America Inc. Casper Refinery 2435 King Blvd., Suite 100 Casper, Wyoming 82604	under WDEQ Remedy Agreement 1/10/2002 WYD007064447 WYD991301086	\$37,363,707	\$ 2,769,813
BP Products North America Inc. Sugar Creek Refinery 1000 North Sterling Avenue Sugar Creek, MO 64054	MOD007161425	\$ 0	\$ 5,947,300
BP Products North America Inc. Whiting Refinery 2815 Indianapolis Blvd. Whiting, IN 46394	IND000810861 (lakefront) IND074375585 (refinery)	\$ 657,737 \$ 0	\$ 1,618,600 \$ 0
BP Products North America Inc. Wood River Refinery P.O. Box 167 Wood River, IL 62095	ILD980503106 (riverfront) ILD980700967 (main plant property)	\$ 112,330 \$ 0	\$ 6,713,648 (includes corrective action) \$29,136,388 (includes corrective action)
BP Exploration (Alaska) Inc. Prudhoe Bay Unit P. O. Box 196612 Anchorage, Alaska 99519-6612	AKD000643239	\$ 949,320	\$ 0
BP Products North America Inc. Toledo Refinery P.O. Box 696 Toledo, Ohio 43697 <small>*Toledo Refinery: BP Corporation North America Inc.'s guarantee also covers Corrective Action costs of \$1,983,493</small>	OHD005057542 OEPA# 03-48-0411	\$ 0	\$1,156,542*
BP Products North America Inc. Lima Refinery 1150 S Metcalf Street Lima, Ohio 45804-1145 <small>*Lima Refinery: BP Corporation North America Inc.'s guarantee also covers Corrective Action costs of \$5,691,969</small>	OHD005051826 OEPA# 03-02-0390	\$ 0	\$ 779,345*



Attachment 2 (Continued)

Closure and/or Post-Closure Estimates for Hazardous Waste Facilities
 Owned, Operated or Guaranteed by BP Corporation North America Inc. or Subsidiaries
 Regulated by EPA or State Administered RCRA Programs

Facility Name and Address	EPA I.D. Number	Current Closure	Current Post Closure
BP West Coast Products LLC Carson Refinery 1801 E. Sepulveda Boulevard Carson, California 90745	CAD077227049	\$ 0	\$20,579,000
BP Products North America Inc. Texas City Refinery 2401 Fifth Avenue South Texas City, Texas 77590	TXD008080533 TXD072181381 HW-50255 & HW-50183	\$ 8,039,616 \$ 4,710,000	\$ 4,463,774 \$10,800,000
BP Products North America Inc. Closed Hazardous Waste Management Facility Salt Lake City Refinery 1700 North 1200 West Salt Lake City, UT 84103	UTD000826370	\$ 0	\$ 383,328
Excess closure or post-closure costs for any site listed in the Guarantee			\$8,332,867



Attachment 3

Closure and/or Post-Closure Estimates for Non-Hazardous Waste Facilities Owned, Operated or Guaranteed by BP Corporation North America Inc. or Subsidiaries

Facility Name and Address	Current Closure	Current Post Closure
BP West Coast Products LLC BP Cherry Point Refinery Non-Hazardous Waste Landfarm Sold Waste Permit Number P0002060	\$ 395,082	\$ 291,275
BP Products North America Inc. Sugar Creek Refinery Oily Dirt Land Treatment Facility Solid Waste Operating Permit Number: 709504	\$ 26,724	\$ 5,544
BP Products North America Inc. Wood River Facility Non-hazardous Landfill IEPA Site Number: 1191155009 <small>Note: The Wood River Non-hazardous Landfill Post Closure cost estimate is included in the Wood River Riverfront Hazardous Waste Facility Post-Closure cost estimate (Attachment 2). Regulatory oversight of this landfill is now managed under the Riverfront Hazardous Waste Permit.</small>	\$ 0	\$ 0
BP Exploration (Alaska) Inc. Prudhoe Bay Unit Pad 3, East Cell, CC2A, T Pad, G&I, East Sag, & W Pad	\$16,138,932	\$ 0
BP Exploration (Alaska) Inc. Milne Point Unit A Pad	\$ 1,198,665	\$ 0
BP Exploration (Alaska) Inc. Badami Oil Field G&I	\$ 119,889	\$ 0
BP Exploration (Alaska) Inc. Endicott Class I & II Pits	\$ 119,889	\$ 0
BP Exploration (Alaska) Inc. Northstar Unit G&I	\$ 119,889	\$ 0
BP America Production Company Produced Water Disposal Basins Wyoming	\$ 0 All facilities were bonded in 2008	\$ 0 All facilities were bonded in 2008



Attachment 4.A

Closure Cost Estimates for Plugging and Abandonment of Class I Hazardous Waste Injection Wells Owned, Operated or Guaranteed by BP Corporation North America Inc. or Subsidiaries

Facility Name and Address	EPA I.D. Number	Current Plugging and Abandonment Cost Estimate
BP Products North America Inc.	TXD008080533	
Texas City Refinery	WDW-80	\$ 211,919
2401 Fifth Avenue South	WDW-127	\$ 200,784
Texas City, Texas 77590	WDW-128	\$ 217,691
	WDW-214	\$ 0 (Not yet built)
	WDW-215	\$ 0 (Not yet built)



Attachment 4.B

Closure Cost Estimates for Plugging and Abandonment of Class I Non-Hazardous Waste Injection Wells Owned, Operated or Guaranteed by BP Corporation North America Inc. or Subsidiaries

Facility Name and Address	EPA I.D. Number	Current Plugging and Abandonment Cost Estimate
BP Exploration (Alaska) Inc. Badami Oil Field (North Slope Alaska) P. O. Box 196612 Anchorage, Alaska 99519-6612	AK11001-A	\$ 5,494,450
BP Exploration (Alaska) Inc. Northstar Unit Oil Field P. O. Box 196612 Anchorage, Alaska 99519-6612	AK11002-A	\$11,014,575
BP America Production Company Garcia #1, Sheep Mountain Unit Huerfano County P.O. Box 325 Gardner, Colorado 81040	C001044-0055	\$ 0 (sold in 2007)
BP Exploration (Alaska) Inc. Milne Point Unit P. O. Box 196612 Anchorage, Alaska 99519-6612	AK11005-A	\$4,364,750
BP Exploration (Alaska) Inc. Prudhoe Bay Unit P.O. Box 196612 Anchorage, Alaska 99519-6612 (3 wells)	AK11004-A	\$ 626,470
BP Exploration (Alaska) Inc. Prudhoe Bay Unit P.O. Box 196612 Anchorage, Alaska 99519-6612 (3 wells)	AK11008-A	\$ 847,275



Attachment 5

Closure Cost Estimates for Plugging and Abandonment of Class II Non-Hazardous Waste Injection Wells Owned, Operated or Guaranteed by BP Corporation North America Inc. or Subsidiaries

Facility Name and Address	EPA I.D. Number	Current Plugging And Abandonment Cost Estimate
BP America Production Company La Plata County Colorado	<u>COS Permit</u> 2477-1941 2153-1899 2129-1885 2553-3102 2128-1884 2476-1940 2127-1883 2467-1927 2785-0000 2456-1990 2154-1902 2156-1904 2500-1975 2157-1905 2501-1976	\$ 63,138 \$ 63,138 \$ 63,138 \$ 63,138 \$ 63,138 \$ 63,138 \$ 63,138 \$ 63,138 \$ 63,138 \$252,801 \$ 63,138 \$ 56,274 \$104,107 \$ 56,274 \$104,107 \$ 83,003
BP America Production Company Florida River Facility Landfarm La Plata County Colorado		\$ 61,620
BP America Production Company Archuleta County Colorado	2720-0378	\$ 63,138
BP America Production Company Sweetwater County Wamsutter, Wyoming	Champlin 337E (UIC Well #1) -93W UIC Well #3 – 94W Frewen 9-4 (UIC Well #4) – 94W UIC Well #5	\$138,140) \$138,140) \$138,140) \$249,641
BP America Production Company Sublette County Farson, WY	UIC Well #1 UIC Well #3	\$249,641 \$249,641



Attachment 5 (Continued)

Closure Cost Estimates for Plugging and Abandonment of Class II Non-Hazardous Waste Injection Wells Owned, Operated or Guaranteed by BP Corporation North America Inc. or Subsidiaries

BP America Production Company San Juan County New Mexico	NN297000014	\$155,902
	EE Elliott – SWD376	\$237,314
	Pritchard – SWD405	\$237,314
	GCU306 – SWD225	\$137,115
	GCU307 – SWD225	\$137,115
	GCU13-1 – SWD450	\$200,399
BP America Production Company San Juan County Navajo Nation – Region 9	GCU328	\$237,314
	GCU259	\$137,115



Attachment 6

**Financial Assurance for Corrective Action and Third Party Compensation for
Underground and Aboveground Storage Tanks Owned, Operated or Guaranteed by
BP Corporation North America Inc. or Subsidiaries Regulated by EPA or State Administered Programs**

BP Amoco Chemical Company Joliet Truck Terminal 23640 S. Youngs Road Channahon, IL 60410 (see tank listing at regional office)	BP Naperville Complex 150 West Warrenville Road Naperville, IL 60563 (see tank listing at regional office)	BP America Production Company 4502 E. 41 st Street Tulsa, OK (see tank listing at regional office)
BP America Production Company 7575 N. Lakewood Tulsa, OK (see tank listing at regional office)	BP America Production Company Westlake I 501 Westlake Park Blvd. Houston, TX (see tank listing at regional office)	BP America Production Company Denver Terminal 6395 East 80 th Avenue Commerce City, CO 80037
BP Products North America Inc. East of the Rockies (Amoco & BP facilities) Facilities in NY, NJ, MD, DC, VA, PA (east), PA (west), FL, GA, TN, OH, MI, KY, IL, MO, WI, MN, IN, CO Policy G2371954A (see tank listing at regional office: 4 Centerpoint Drive, La Palma, CA)	BP Products North America Inc. East of the Rockies (WISCONSIN) 10477 120 th Avenue Pleasant Prairie, WI	BP Products North America Inc. East of the Rockies (WISCONSIN) 9101 North 107 th Milwaukee, WI
BP Pipelines North America Inc. BP Carson Refinery 1801 East Sepulveda Blvd. Carson, CA 90749 Note: these assets are operated by BP Pipelines North America Inc., but owned by the Carson BU (see tank listing at regional office)	BP Pipelines North America Inc. BP Carson Crude Terminal 24696 South Wilmington Avenue Carson, CA 90749 Note: these assets are operated by BP Pipelines North America Inc., but owned by the Carson BU (see tank listing at regional office)	BP Pipelines North America Inc. BP Carson Refinery 22470 Wilmington Avenue Carson, CA 90749 (see tank listing at regional office)
BP US Logistics MO, KY, NY, OH, FL, TN, WI, IL, NC, SC (see tank listing at regional office)	BP West Coast Products LLC ARCO Retail Facilities in CA, WA, OR, AZ, NV (see tank listing at regional office: 4 Centerpoint Drive, La Palma, CA)	BP West Coast Products LLC BP Pipelines & Logistics Terminals in CA, WA, OR, AZ (see tank listing at regional office: 1306 Canal Blvd., Richmond, CA)
BP West Coast Products LLC Carson Refinery 1801 E. Sepulveda Blvd. Carson CA, 90745 (Two 5000-gallon USTs – Garage Area)	Air BP Akron Canton Airport 5430 Lauby Road North Canton, OH 44720	Air BP Greenville Spartanburg Airport 2100 Greenville – Spartanburg Airport Greer, SC 29651
BP Exploration (Alaska) Inc. Anchorage, AK (see tank listing at regional office)	BP Products North America Inc. Toledo Refinery Toledo, OH (see tank listing at regional office)	BP Pipelines North America Inc. Bryan, TX (see tank listing at regional office)
BP America Inc. Port Newark Terminal Coastal Street, Building 350 Newark, NJ 07114	Cypress Property LLC Urbietta Oil , BP 14590 Biscayne Boulevard Miami, FL 33138	Air BP Cleveland Hopkins Airport 5241 Secondary Road Cleveland, OH 44135
MARSH, maintains copies of ALL UST facility liability endorsement policies. Michael Robbins or Jeff Hall 312-627-6000 or jeffrey.p.hall@marsh.com	BP America Inc. Sugar Creek Terminal 1000 N Sterling Avenue Sugar Creek, MO	



Attachment 7

Liability Coverage and Assurance for Performance of EPA Order or Consent Decree for Facilities Owned, Operated or Guaranteed by BP Corporation North America Inc. or Subsidiaries

Facility Name and Address	Type(s) of Coverage	Cost Estimate
BP Amoco Chemical Company Joliet Landfill 155 and US Highway 6 Joliet, IL 60434-0941	Sudden and Non-sudden RI/FS	\$ 828,827
BP Amoco Chemical Company Joliet Landfill 155 and US Highway 6 Joliet, IL 60434-0941	Sudden and Non-sudden RD/RA	\$11,996,387
BP Exploration (Alaska) Inc. Prudhoe Bay Unit P.O. Box 196612 Anchorage, AK 99519-6612	RCRA §3008(h) Interim Removal Action Former Tuboscope Site	\$4,279,514
BP Products North America Inc. Carteret Terminal 760 Roosevelt Avenue Carteret, NJ 07008	Cleanup & Removal Activities	\$2,000,000
BP Products North America Inc. Choma's Amoco (Garfield Getty) 45 Monroe Street Garfield City, NJ	Case No. 93-03-25-1418M PI#024762	\$1,100,000
BP Products North America Inc. The Carborundum Co Performance Refractories Division 75 Crows Mill Road Keasbey, NJ	Case No. 012611/E95212 CTN 14934	\$1,249,000
BP Products North America Inc. Former ARCO Products Company/Trenton Terminal 1140 Lambertson Road Trenton, NJ	ISRA Case No. 86537	\$ 250,000



Attachment 7 (Continued)

Liability Coverage and Assurance for Performance of EPA Order or Consent Decree for Facilities Owned, Operated or Guaranteed by BP Corporation North America Inc. or Subsidiaries

Facility Name and Address	Type(s) of Coverage	Cost Estimate
BP Products North America Inc. Former ARCO Woodbury Terminal Route 44/Crown Point Road Thorofare, NJ	ISRA Case No. 86682	\$ 100,000
BP Products North America Inc. Former BP Terminal No. 03173 Woodbury, NJ	Case No 078488821 ISRA Case No. 95443	\$ 200,000
BP Products North America Inc. BP Terminal No. 4555 Paulsboro, NJ	Case No. 043278787 ISRA Case No. 95444	\$28,000,000
BP Products North America Inc. Former BP Terminal No. 4557 Linden, NJ	Case No. 067512814 ISRA Case No. 95445	\$ 2,800,000
Atlantic Richfield Company Milltown Reservoir Sediments Operable Unit Milltown, Montana	Milltown Site Consent Decree Civil Action No. CV 89-039-BU-SEH	\$ 264,487
Atlantic Richfield Company Butte Mine Flood Site Butte, Montana	Butte Mine Flooding Consent Civil Action No. 02-35-BU-SHE	\$59,300,000
Atlantic Richfield Company Anaconda/Yerington Mine Site Yerington, Nevada	RI/FS CERCLA Docket No. 9-2007-0005	\$18,000,000
Atlantic Richfield Company Operating Industries, Inc. (OII) Superfund Site Monterey Park, California	Superfund Site Guaranty 8 th Partial Consent Decree CV 01-11162 RSWL	\$9,290,000
Atlantic Richfield Company Leviathan Mine Site Alpine County, CA near Markleeville	RI/FS EPA ID# CAD980673685	\$9,000,000



Attachment 7 (Continued)

Liability Coverage and Assurance for Performance of EPA Order or Consent Decree for Facilities Owned, Operated or Guaranteed by BP Corporation North America Inc. or Subsidiaries

Facility Name and Address	Type(s) of Coverage	Cost Estimate
BP Lubricants USA Inc. Martin Aaron Superfund Site 1542 South Broadway Camden, New Jersey	L/C TPTS-577260 EPA ID# NJD014623854	\$ 62,171
Atlantic Richfield Company Martin Aaron Superfund Site 1542 South Broadway Camden, New Jersey	L/C TPTS-577250 EPA ID# NJD014623854	\$ 25,921
Atlantic Richfield Company Parks Shallow Land Disposal Area (SLDA)	L/C P-226881	\$10,000,000
Atlantic Richfield Company Carteret Terminal 760 Roosevelt Avenue Carteret, New Jersey	L/C P-259746 ISRA E86A85	\$5,000,000
BP Products North America Inc. Northwest Oil Drain Salt Lake City, UT	Administrative Order on Consent CERCLA-08-2003-0014	\$2,540,000



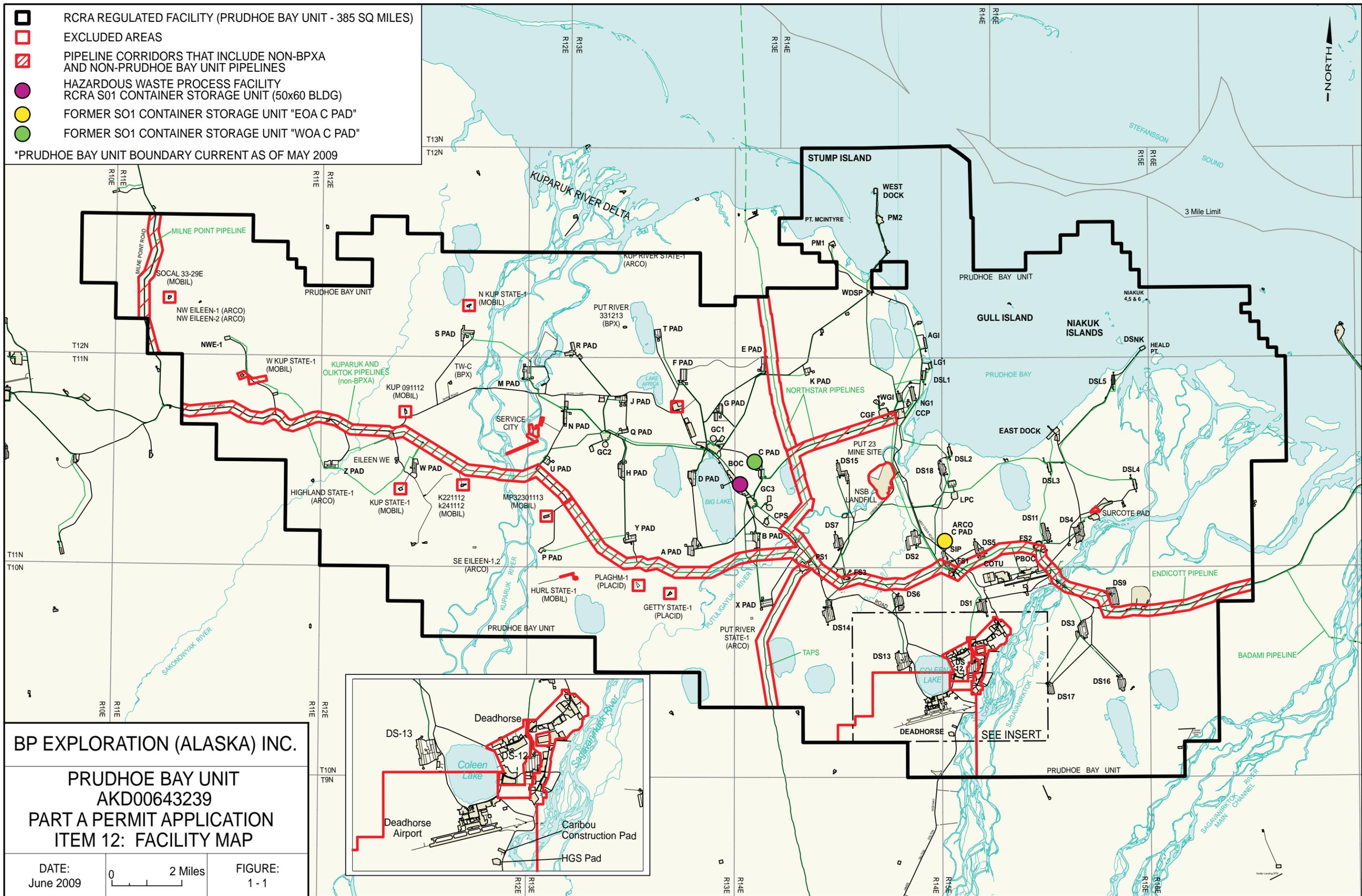
Attachment 8

Guaranty of Financial Responsibility for Oil Spill Response and Damages guaranteed by
 BP Corporation North America Inc. or Subsidiaries Regulated by the Department of Fish and Game, Office of
 Spill Prevention and Response, Sacramento, California
GUARANTY DOES NOT EXCEED \$300,000,000

BP West Coast Products LLC Carson Refinery and Pipeline, 1801 East Sepulveda, Carson, CA 90749 Certificate 20038-07-002	BP West Coast Products LLC BP Richmond Terminal, 1306 Canal Boulevard, Richmond, CA 94804 Certificate 20038-02-003	BP West Coast Products LLC Marine Terminal 1, 1300 Pier B Street Long Beach, CA 90813 Certificate 20038-09-001
Arco Terminal Services Corporation ATSC Marine Terminal 2, 1300 Pier B Street & Terminal 3, 1400 Pier C St Berths, 76, 77 & 78, Long Beach CA Certificate 20038-03-001	Arco Terminal Services Corporation Pipeline 32, Terminal 2, Gabx, West Hynes, OCC Certificate 20038-03-003	Arco Terminal Services Corporation Pipeline 53, Terminal 2, Berths 76, 77 & 78, Long Beach, CA Certificate 20038-03-006
Arco Terminal Services Corporation Pipeline 49, Terminal 2 to Los Angeles Refinery Certificate 20038-03-004	Arco Terminal Services Corporation Pipeline 64, Terminal 2 to GATX Facility Certificate 20038-03-007	Arco Terminal Services Corporation Pipeline 69, Terminal 2 to Los Angeles Refinery Certificate 20038-03-008
Arco Terminal Services Corporation Pipeline 70, Terminal 2 to Los Angeles Refinery Certificate 20038-03-009	Arco Terminal Services Corporation Pipeline 71, Terminal 2 to Operations Control Center Certificate 20038-03-010	Arco Terminal Services Corporation Pipeline 73, Terminal 2, Berths 76, 77 & 78, Long Beach CA Certificate 20038-03-011
Arco Terminal Services Corporation Pipeline 78, Terminal 2, Berths 76, 77 & 78, Long Beach, CA Certificate 20038-03-012	Arco Terminal Services Corporation Pipeline 79, Terminal 2 to Los Angeles Refinery Certificate 20038-03-013	Arco Terminal Services Corporation Pipeline 82, Terminal 2 to Berth 121 Terminal Certificate 20038-03-014
Arco Terminal Services Corporation Pipeline 83, Terminal 2 to Berth 121 Terminal Certificate 20038-03-015	Arco Terminal Services Corporation Pipeline 103, Los Angeles Refinery Certificate 20038-03-016	Arco Terminal Services Corporation Pipeline E1, Thums Lease in Port of Long Beach to Connection with Line 17 at Spring and Cherry Streets Certificate 20038-03-017
Arco Terminal Services Corporation Pipeline E31, Hathaway, East Hynes, Mobil, OCC, Petrodiamond Certificate 20038-03-018	Arco Terminal Services Corporation Pipeline E32, East Hynes, GATX, Texaco Certificate 20038-03-019	Arco Terminal Services Corporation Pipeline E33, Hathaway, East Hynes, Terminal 2, Texaco, GATX, Ultramar, Petrodiamond Certificate 20038-03-020
Arco Terminal Services Corporation Pipeline E51, Hathaway, East Hines, Los Angeles Refinery, Mobil, Terminal 2, Texaco, Chemoil Certificate 20038-03-021	Arco Terminal Services Corporation Pipeline E51, Shell, Ultramar, GATX, Wickland, Mobil, Wilmington Liquid Bulk Certificate 20038-03-022	Arco Terminal Services Corporation Pipeline E52, GATX, Texaco, Ultramar, Hathaway, East Hynes Certificate 20038-03-023
BP Lubricants USA Inc. Castrol Richmond Terminal, 801 Wharf Street, Richmond CA 94804 Certificate 20005-00-001	Arco Terminal Services Corporation Pipeline 34, East Hynes to Los Angeles Refinery Certificate 20038-03-002	Arco Terminal Services Corporation Pipeline 79, Terminal 2 to Los Angeles Refinery Certificate 20038-03-024
Arco Terminal Services Corporation Pipeline 80, Los Angeles Refinery to Vinvale Terminal Certificate 20038-03-025		

- RCRA REGULATED FACILITY (PRUDHOE BAY UNIT - 385 SQ MILES)
- EXCLUDED AREAS
- PIPELINE CORRIDORS THAT INCLUDE NON-BPXA AND NON-PRUDHOE BAY UNIT PIPELINES
- HAZARDOUS WASTE PROCESS FACILITY
RCRA S01 CONTAINER STORAGE UNIT (50x60 BLDG)
- FORMER SO1 CONTAINER STORAGE UNIT "EOA C PAD"
- FORMER SO1 CONTAINER STORAGE UNIT "WOA C PAD"

*PRUDHOE BAY UNIT BOUNDARY CURRENT AS OF MAY 2009



BP EXPLORATION (ALASKA) INC.

**PRUDHOE BAY UNIT
AKD00643239
PART A PERMIT APPLICATION
ITEM 12: FACILITY MAP**

DATE:
June 2009

0 2 Miles

FIGURE:
1 - 1

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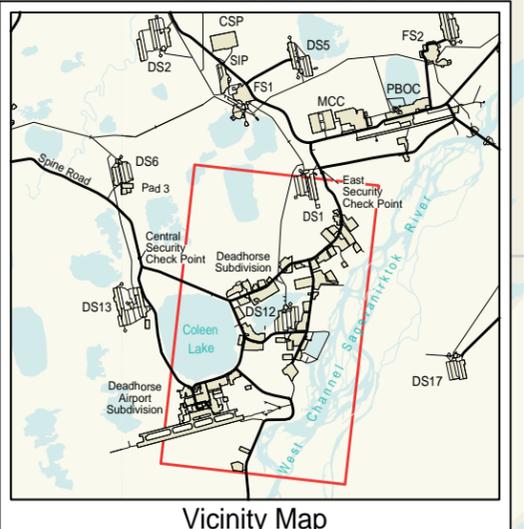
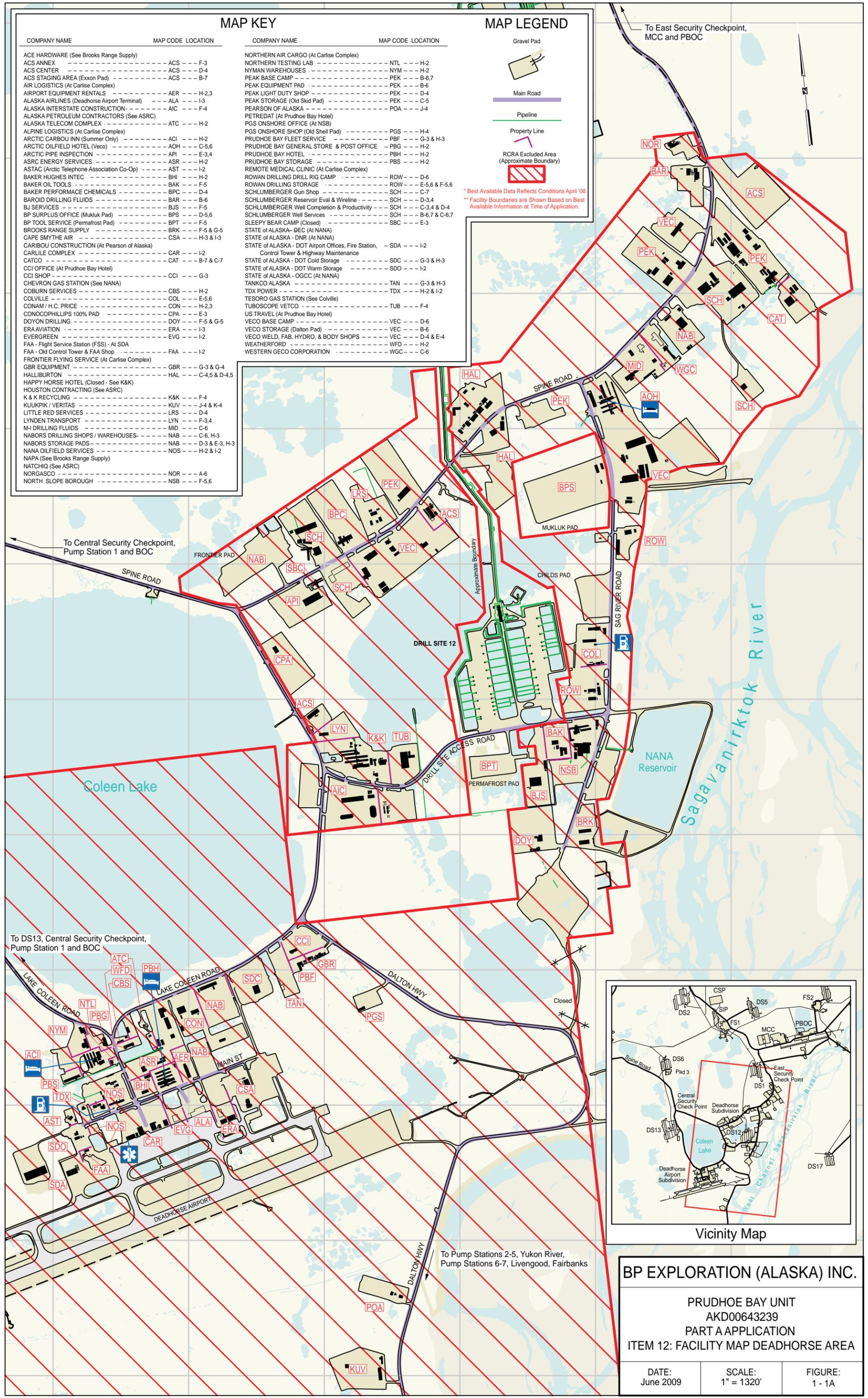
A
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MAP KEY

MAP LEGEND

COMPANY NAME	MAP CODE	LOCATION	COMPANY NAME	MAP CODE	LOCATION
ACE HARDWARE (See Brooks Range Supply)			NORTHERN AIR CARGO (At Carlise Complex)	NTL	H-2
ACS ANNEX	ACS	F-3	NORTHERN TESTING LAB	NYM	H-2
ACS CENTER	ACS	D-4	NYMAN WAREHOUSE	PEK	B-6,7
ACS STAGING AREA (Exxon Pad)	ACS	B-7	PEAK BASE CAMP	PEK	B-6
AIR LOGISTICS (At Carlise Complex)			PEAK EQUIPMENT PAD	PEK	D-4
AIRPORT EQUIPMENT RENTALS	AER	H-2,3	PEAK LIGHT DUTY SHOP	PEK	C-5
ALASKA AIRLINES (Deadhorse Airport Terminal)	ALA	I-3	PEARSON OF ALASKA	POA	J-4
ALASKA INTERSTATE CONSTRUCTION	AIC	F-4	PETREDAT (At Prudhoe Bay Hotel)		
ALASKA PETROLEUM CONTRACTORS (See ASRC)			PGS ONSHORE OFFICE (At NSB)		
ALASKA TELECOM COMPLEX	ATC	H-2	PGS ONSHORE SHOP (Old Shell Pad)	PGS	H-4
ALPINE LOGISTICS (At Carlise Complex)			PRUDHOE BAY FLEET SERVICE	PBF	G-3 & H-3
ARCTIC CARBOU INN (Summer Only)	ACI	H-2	PRUDHOE BAY GENERAL STORE & POST OFFICE	PBG	H-2
ARCTIC OILFIELD HOTEL (Veco)	AOH	C-5,6	PRUDHOE BAY HOTEL	PBH	H-2
ARCTIC PIPE INSPECTION	API	E-3,4	PRUDHOE BAY STORAGE	PBS	H-2
ASRC ENERGY SERVICES	ASR	H-2	REMOTE MEDICAL CLINIC (At Carlise Complex)		
ASTAC (Arctic Telephone Association Co-Op)	AST	I-2	ROWAN DRILLING DRILL RIG CAMP	ROW	D-6
BAKER HUGHES INTEC	BHI	H-2	ROWAN DRILLING STORAGE	ROW	E-5,6 & F-5,6
BAKER OIL TOOLS	BAK	F-5	SCHLUMBERGER Gun Shop	SCH	C-7
BAKER PERFORMANCE CHEMICALS	BPC	D-4	SCHLUMBERGER Reservoir Eval & Wireline	SCH	D-3,4
BAROID DRILLING FLUIDS	BAR	B-6	SCHLUMBERGER Well Completion & Productivity	SCH	C-3,4 & D-4
BJ SERVICES	BJS	F-5	SCHLUMBERGER Well Services	SCH	B-6,7 & C-6,7
BP SURPLUS OFFICE (Mukluk Pad)	BPS	D-5,6	SLEEPY BEAR CAMP (Closed)	SBC	E-3
BP TOOL SERVICE (Permafrost Pad)	BPT	F-5	STATE OF ALASKA - BEC (At NANA)		
BROOKS RANGE SUPPLY	BRK	F-5 & G-5	STATE OF ALASKA - DNR (At NANA)		
CAPE SMYTHE AIR	CSA	H-3 & I-3	STATE OF ALASKA - DOT Airport Offices, Fire Station, Control Tower & Highway Maintenance	SDA	I-2
CARIBOU CONSTRUCTION (At Pearson of Alaska)	CAR	H-3 & I-3	STATE OF ALASKA - DOT Cold Storage	SDC	G-3 & H-3
CAPE COMPLEX	CAR	H-3 & I-3	STATE OF ALASKA - DOT Warm Storage	SDO	I-2
CCI OFFICE (At Prudhoe Bay Hotel)	CCI	G-3	STATE OF ALASKA - OGCC (At NANA)		
CCI SHOP	CCI	G-3	TANKCO ALASKA	TAN	G-3 & H-3
CHEVRON GAS STATION (See NANA)			TDX POWER	TDX	H-2 & I-2
COBURN SERVICES	CBS	H-2	TESORO GAS STATION (See Colville)		
COLVILLE	COL	E-5,6	TUBOSCOPE VETCO	TUB	F-4
CONAM / H.C. PRICE	CON	H-2,3	US TRAVEL (At Prudhoe Bay Hotel)		
CONOCOPHILLIPS 100% PAD	CPA	E-3	VECO BASE CAMP	VEC	D-6
DOYON DRILLING	DOY	F-5 & G-5	VECO STORAGE (Dalton Pad)	VEC	B-6
ERA AVIATION	ERA	I-3	VECO WELD, FAB, HYDRO, & BODY SHOPS	VEC	D-4 & E-4
EVERGREEN	EVG	I-2	WEATHERFORD	WFD	H-2
FAA - Flight Service Station (FSS) - At SDA	FAA	I-2	WESTERN GECO CORPORATION	WGC	C-6
FAA - Old Control Tower & FAA Shop	FAA	I-2			
FRONTIER FLYING SERVICE (At Carlise Complex)					
GBR EQUIPMENT	GBR	G-3 & G-4			
HALLIBURTON	HAL	C-4,5 & D-4,5			
HAPPY HORSE HOTEL (Closed - See K&K)					
HOUSTON CONTRACTING (See ASRC)					
K & K RECYCLING	K&K	F-4			
KUUKPIK / VERITAS	KUV	J-4 & K-4			
LITTLE RED SERVICES	LRS	D-4			
LYNDEN TRANSPORT	LYN	F-3,4			
M-I DRILLING FLUIDS	MID	C-6			
NABORS DRILLING SHOPS / WAREHOUSES	NAB	C-6, H-3			
NABORS STORAGE PADS	NAB	D-3 & E-3, H-3			
NANA OILFIELD SERVICES	NOS	H-2 & I-2			
NAPA (See Brooks Range Supply)					
NATCHIQ (See ASRC)					
NORGASCO	NOR	A-6			
NORTH SLOPE BOROUGH	NSB	F-5,6			

* Best Available Data Reflects Conditions April '08
** Facility Boundaries are Shown Based on Best Available Information at Time of Application.

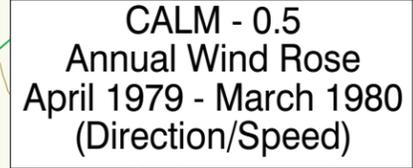
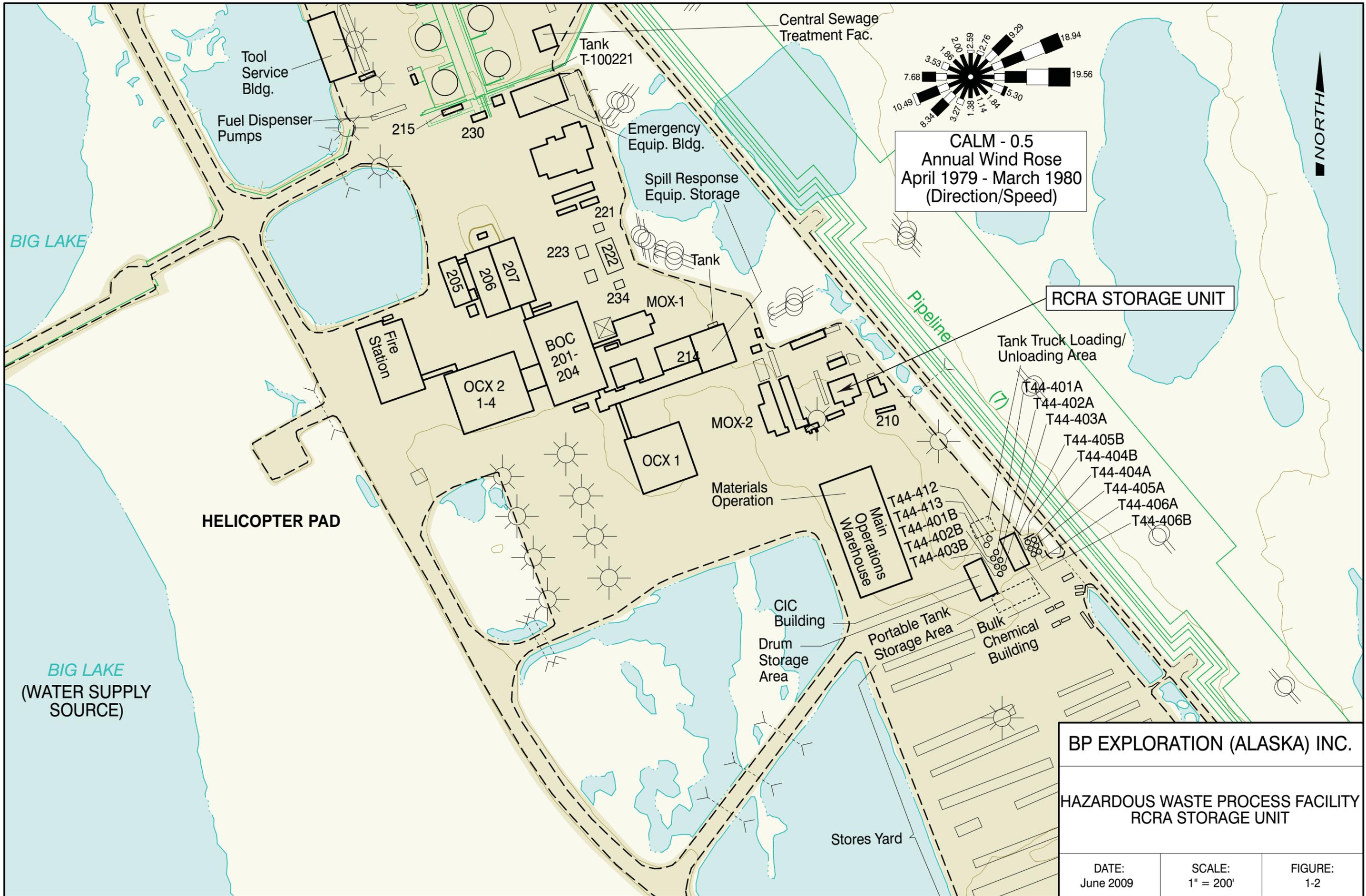


BP EXPLORATION (ALASKA) INC.

PRUDHOE BAY UNIT
AKD00643239
PART A APPLICATION
ITEM 12: FACILITY MAP DEADHORSE AREA

DATE: June 2009	SCALE: 1" = 1320'	FIGURE: 1 - 1A
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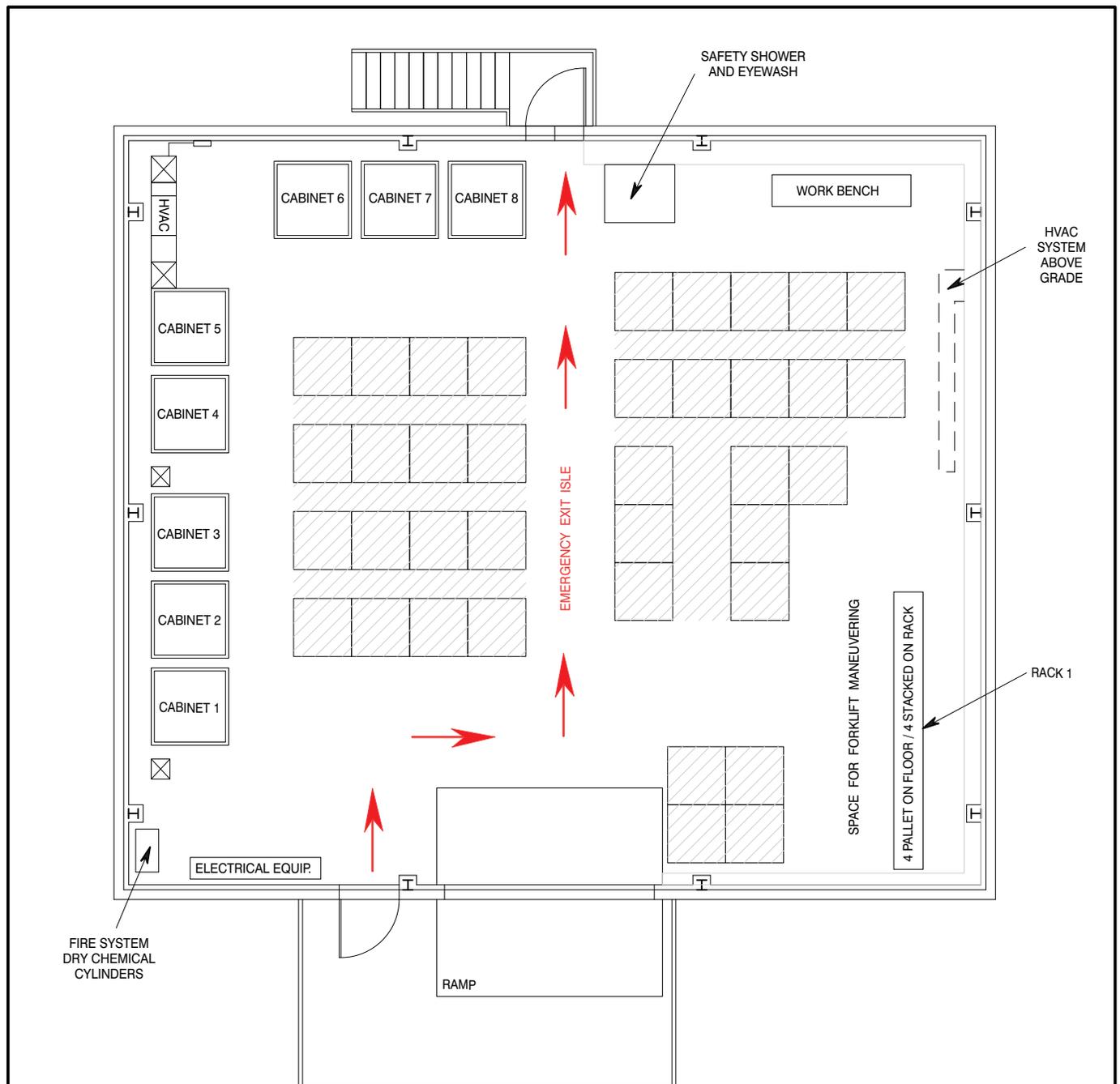


RCRA STORAGE UNIT

BP EXPLORATION (ALASKA) INC.

**HAZARDOUS WASTE PROCESS FACILITY
RCRA STORAGE UNIT**

DATE: June 2009	SCALE: 1" = 200'	FIGURE: 1-2
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NOTES:

1. FLOOR PLAN SHOWN IS HYPOTHETICAL FOR MAXIMUM STORAGE QUANTITY ESTIMATION. STORAGE AND PROCESSING WILL BE ARRANGED WITHIN THE WORK AREA TO MEET THE FOLLOWING CONSTRAINTS.

- a. MINIMUM ISLE SPACE OF 3 FEET WILL BE PROVIDED AT ALL TIMES
- 2. DRUMS WITHIN THE WORK AREA MAY BE DOUBLE-STACKED, EXCEPT FOR THE CLASS 1 FLAMMABLES.
- 3. ALL CABINETS ARE SUITABLE FOR EITHER HYDROCARBON OR CORROSIVES STORAGE.
- 4. SQUARES IN THE CENTER WORK AREA REPRESENT PALLETS.
- 5. THERE IS RACK STORAGE SPACE FOR 13 BOXES OR 52 DRUMS OF LIGHT BULBS ABOVE CABINETS 1-8.

LEGEND:

 ADDITIONAL STORAGE OR PROCESSING WORK AREA

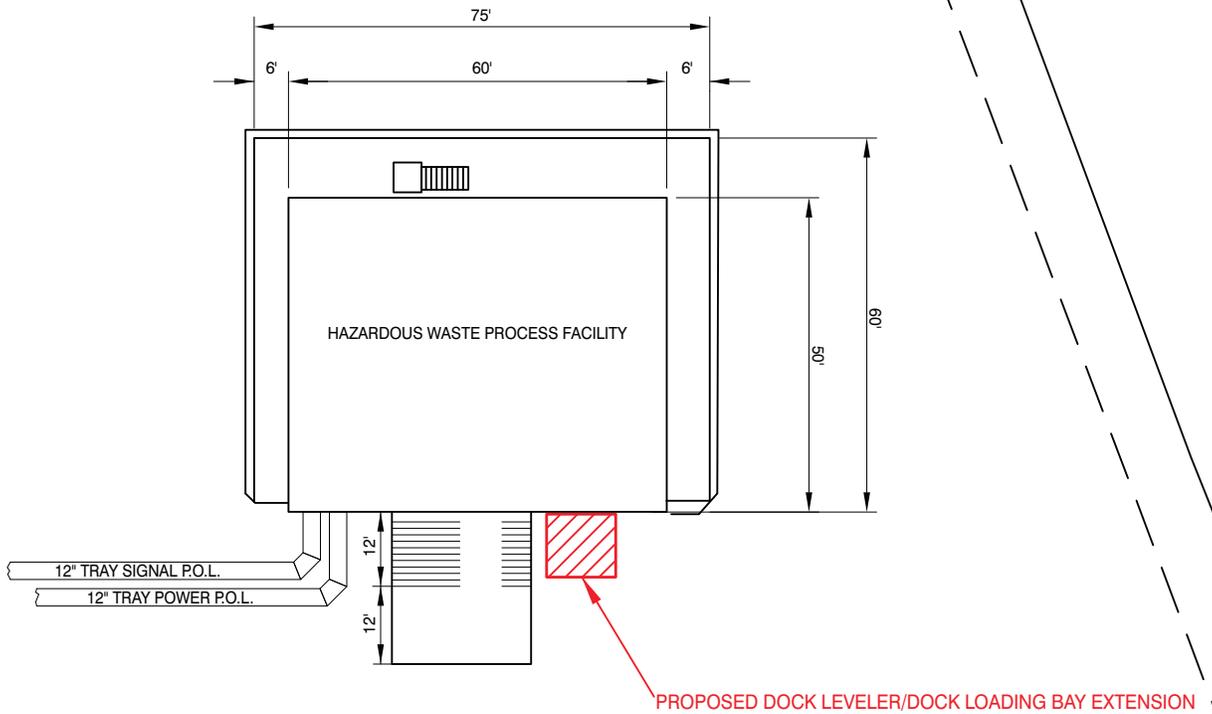
BP EXPLORATION (ALASKA) INC.

**HAZARDOUS WASTE PROCESS FACILITY
FLOOR PLAN**

DATE:
June 2009

SCALE:
NOT TO SCALE

FIGURE:
1 - 3



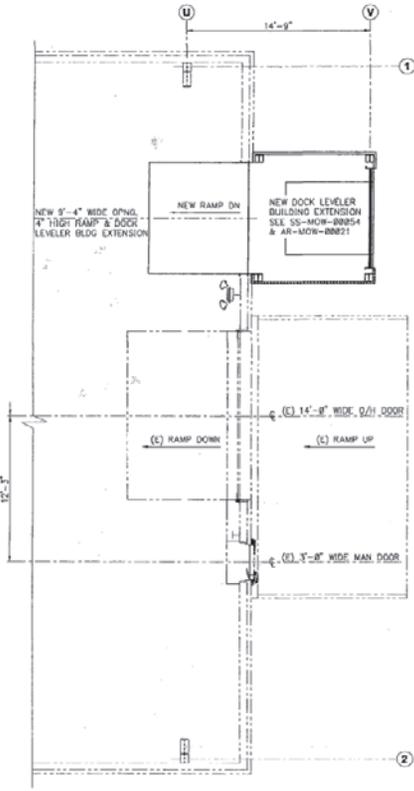
BP EXPLORATION (ALASKA) INC.

**HAZARDOUS WASTE PROCESS FACILITY
PROPOSED DOCK LEVELER /
DOCK LOADING BAY EXTENSION**

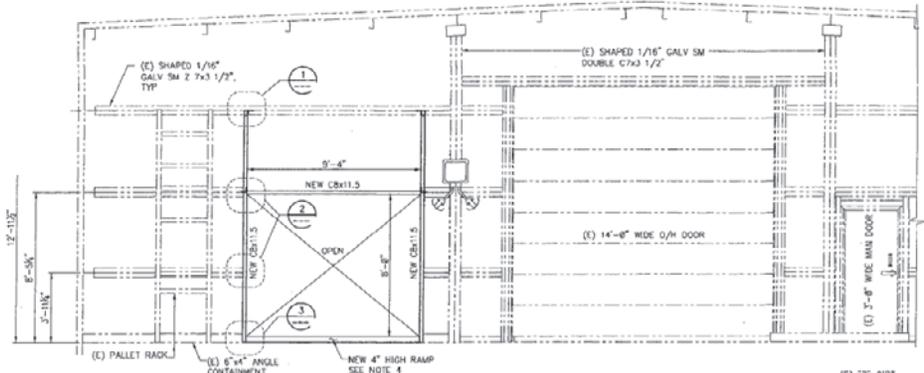
DATE:
June 2009

SCALE:
NOT TO SCALE

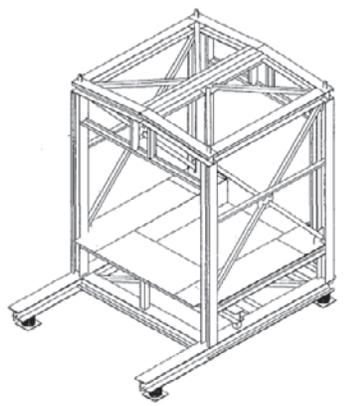
FIGURE:
1 - 4



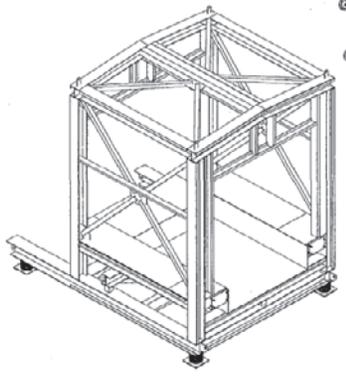
LOCATION PLAN
1/4" = 1'-0"



PARTIAL INTERIOR ELEVATION LOOKING SOUTH
3/8" = 1'-0"

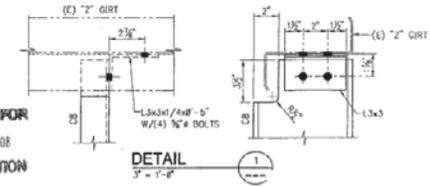


**DOCK LEVELER BLDG
LOOKING SOUTHEAST**
NTS

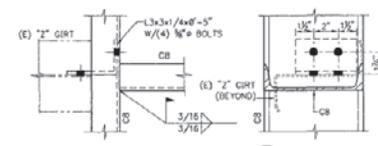


**DOCK LEVELER BLDG
LOOKING NORTHEAST**
NTS

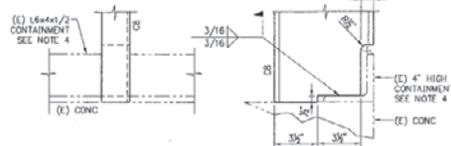
**GPB ISSUED FOR
OCT 1 & 2008
CONSTRUCTION**



DETAIL 1
3/8" = 1'-0"



DETAIL 2
3/8" = 1'-0"



DETAIL 3
3/8" = 1'-0"

NOTES:

- MATERIALS**
STEEL MEMBERS LISTED (LT)
PIPE (6" & 12")
PLATE (LT)
STEEL BEAM (W10x45)
STUD BOLTS
GRADE
API 2L-30S
A572-50
A572-50
A320
- STEEL MEMBERS NOT LISTED (LT)**
STEEL BEAMS, CHANNELS, ANGLES
TUBE STEEL
PLATE
BOLTS
A36
A500 GRADE B
A36
A325
- MATERIAL TOUGHNESS REQUIREMENTS PER**
BP SPEC. SPC-55-00000
TABLE 1. SAFETY CLASS 1, EXPOSED STEEL
LOW - - - (CON 15 10/MS 9 -387)
TABLE 2. SAFETY CLASS 2, ENCLOSED STEEL
LOW - - - (NO TOUGHNESS REQUIREMENTS)
- (E) - EXISTING
(VF) - VERIFY IN FIELD
(LT) - LOW TEMPERATURE STEEL
FIELD TO DEMOLISH TOP 2" OF (E) L6Wx41/2 (LVV)
IN VICINITY OF NEW OPENING PRIOR TO
INSTALLATION OF NEW 4" HIGH RAMP TO DOCK
LEVELER BUILDING EXTENSION.

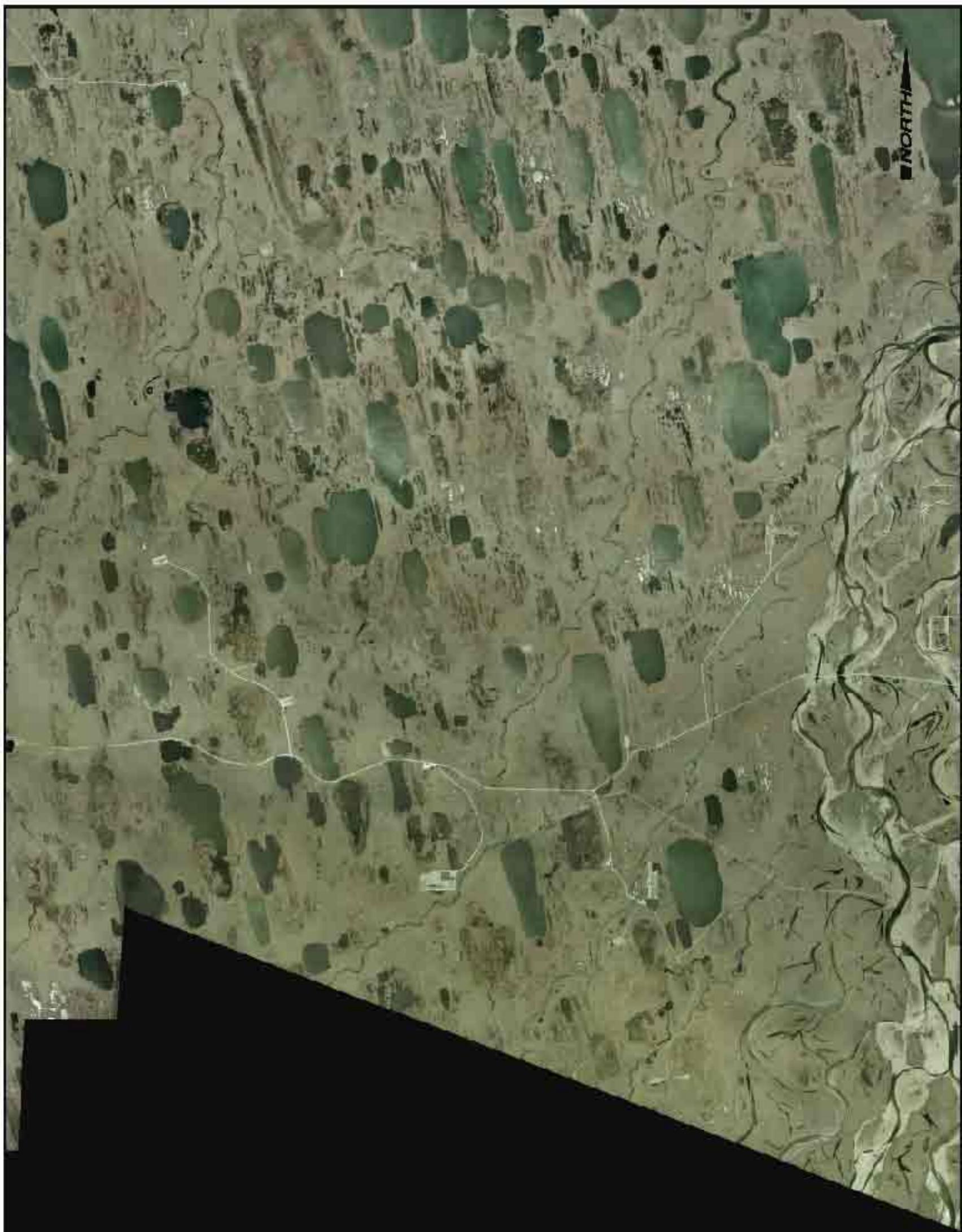
BP EXPLORATION (ALASKA) INC.

**HAZARDOUS WASTE PROCESS FACILITY
PROPOSED DOCK LEVELER /
DOCK LOADING BAY EXTENSION
STRUCTURAL DRAWING**

DATE:
June 2009

SCALE:
N/A

FIGURE:
1 - 5



BP EXPLORATION (ALASKA) INC.

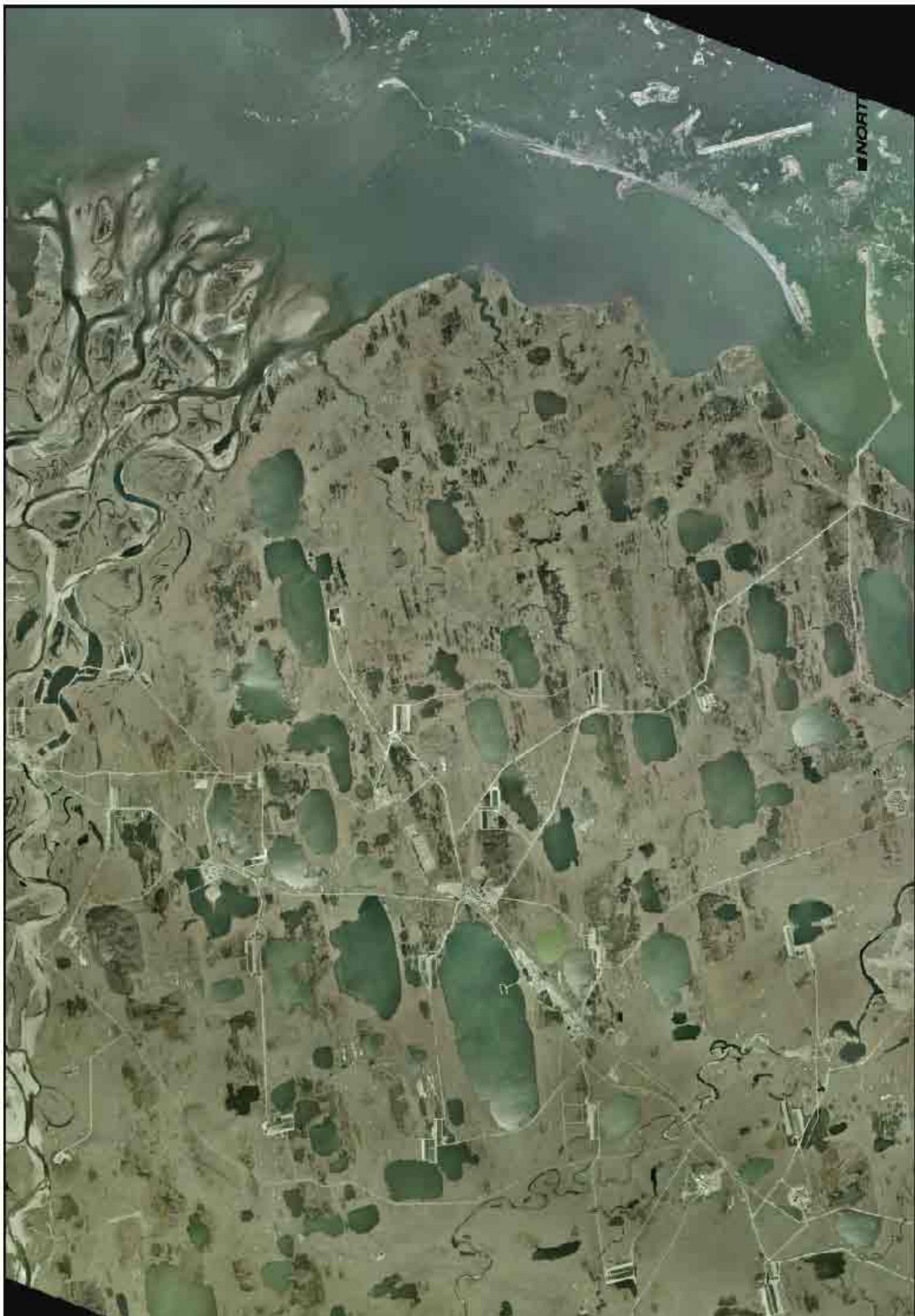
**PRUDHOE BAY UNIT
WESTERN FACILITIES**

Photography Taken July 2008

**DATE:
June 2009**

**SCALE:
1" = 6000'**

**FIGURE:
1 - 6**



■ NORTH

BP EXPLORATION (ALASKA) INC.

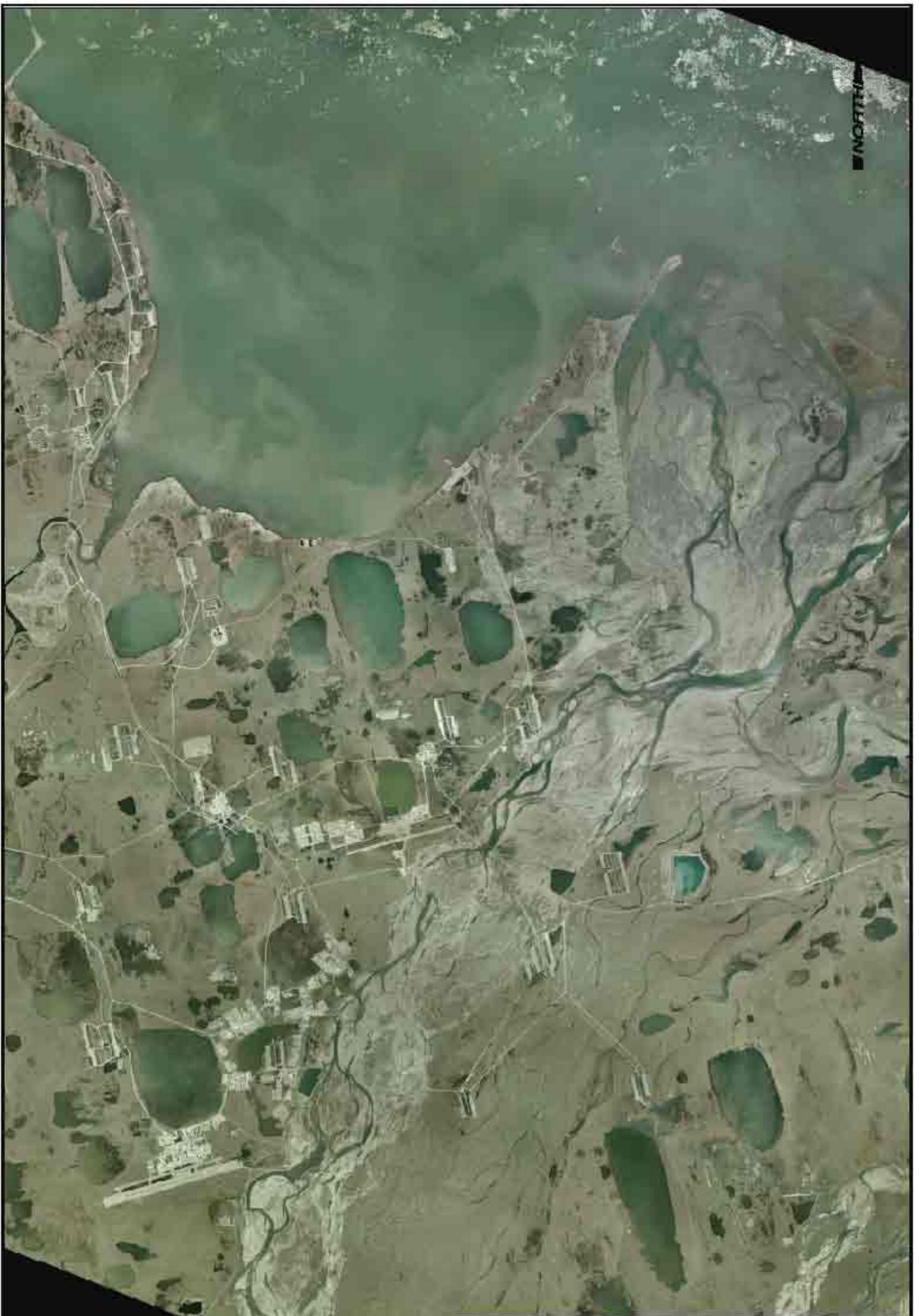
**PRUDHOE BAY UNIT
CENTRAL FACILITIES**

DATE:
June 2009

SCALE:
1" = 6000'

FIGURE:
1 - 7

Photography Taken July 2008



BP EXPLORATION (ALASKA) INC.

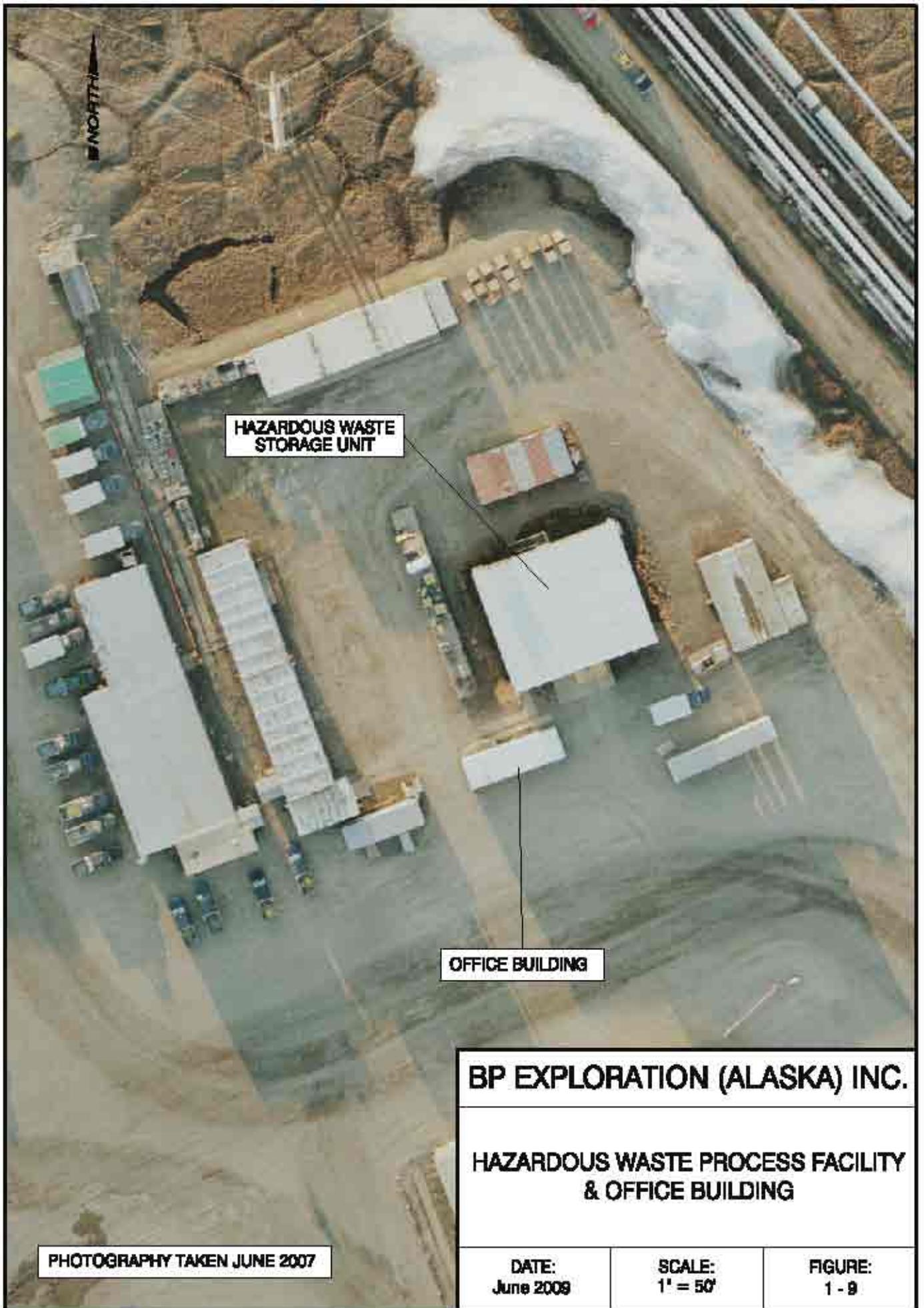
**PRUDHOE BAY UNIT
EASTERN FACILITIES**

Photography Taken July 2008

DATE:
June 2009

SCALE:
1" = 6000'

FIGURE:
1 - 8



PHOTOGRAPHY TAKEN JUNE 2007

BP EXPLORATION (ALASKA) INC.

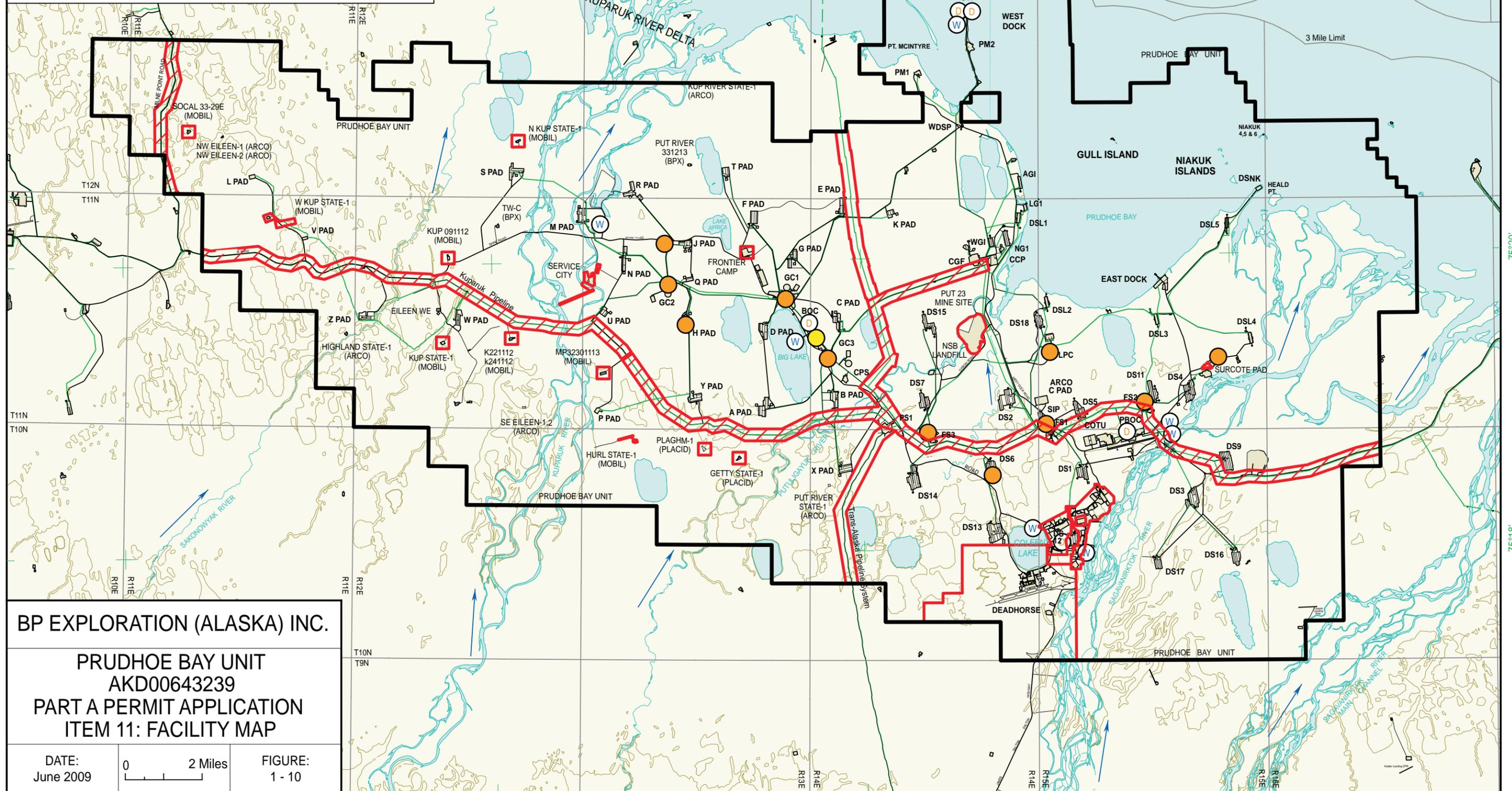
**HAZARDOUS WASTE PROCESS FACILITY
& OFFICE BUILDING**

DATE:
June 2009

SCALE:
1" = 50'

FIGURE:
1 - 9

- RCRA REGULATED FACILITY (PRUDHOE BAY UNIT)
 - EXCLUDED AREAS
 - PIPELINE CORRIDORS THAT INCLUDE NON-BPXA AND NON-PRUDHOE BAY UNIT PIPELINES
 - DISPOSAL WELL(S)
 - WATER INTAKE
 - WATER DISCHARGE
 - HAZARDOUS WASTE PROCESS FACILITY
RCRA S01 CONTRANIER STORAGE UNIT (50'x60' BLDG)
 - RIVER CURRENT FLOW
- *PRUDHOE BAY UNIT BOUNDARY CURRENT AS OF MAY 2009



BP EXPLORATION (ALASKA) INC.

**PRUDHOE BAY UNIT
AKD00643239
PART A PERMIT APPLICATION
ITEM 11: FACILITY MAP**

DATE: June 2009

0 2 Miles

FIGURE: 1 - 10