



Jane Stricker

Director, Regulatory Agreement Compliance
BP America, Inc.

BP America, Inc.
501 Westlake Park Boulevard
Houston, Texas 77079

P. O. Box 3092
Houston, Texas 77253-3092

281-366-2000 (Main)
832-619-4498

BP CONFIDENTIAL

July 2, 2018

Mr. Frank Lane
U. S. Environmental Protection Agency
1300 Pennsylvania Avenue, NW
Ronald Regan Bldg (Room #51235)
Washington, DC 20004
Fed Ex Tracking #772616385560

RE: Compliance with BP / EPA Administrative Agreement –
Response to the Independent Auditor’s Report and Corrective Action Plan

This letter is regarding the 2017 EPA Independent Auditor Report (the "Audit Report"), submitted June 15, 2018 as required under Section XI of the 2014 BP / EPA Administrative Agreement (as modified on December 24, 2014) (the "Agreement").

The Audit Report covers the audit period of January 1, 2017 through December 31, 2017. The Audit Report identified one deficiency in compliance with the Agreement. BP is providing its corrective action plan to address the identified deficiency.

The one deficiency in compliance identified by the EPA Independent Auditor is noted below (in italics) and is followed by BP’s response and corrective action plan.

1. SECTION VII.8(B) – Targeted Compliance Training for Group US Employees

Due to an administrative error in the assignment of targeted training, one (1) employee out of twenty-five (25) employees sampled completed the required targeted training forty-four (44) days past the required one (1) year deadline.

BP acknowledges this deficiency and, at the time it was identified, conducted a thorough review to determine the cause. In this instance, the error in the assignment of targeted training resulted from the employee being mistakenly excluded from a list of new employees during the mid-year training assignment cycle in 2016. Since that time, and throughout the term of the Agreement, BP has continued to improve its training assignment process to ensure all new employees are identified, assigned, and complete the appropriate targeted compliance training within their first year. BP will continue to monitor the assignment of training for new employees to ensure the targeted compliance training assigned is appropriate for the position occupied by the new Group US Employee.

This response and corrective action plan is being provided in accordance with the following terms of the Agreement:

XI. EPA INDEPENDENT AUDITOR

3. SCOPE OF INDEPENDENT AUDITOR'S COMPLIANCE DUTIES

A. Particular Duties. The EPA Independent Auditor shall:

6. If either (a) BPA's certification or report identifies a deficiency in compliance, or (b) the EPA Independent Auditor identifies a deficiency in compliance, the EPA Independent Auditor shall so report to the EPA Authorized Representative(s) and the BP Authorized Representative(s), and the relevant BP Covered Entity shall develop a timely and appropriate corrective action plan for the identified non-compliance, the implementation of which the EPA Independent Auditor shall review as part of its compliance assessment.

Please let me know if you have any questions or if you require any further information.

Sincerely,



Jane Stricker
Director, Regulatory Agreements Compliance
BP America, Inc.