



Patricia Roberts
PSM/OE Manager

PSM/ Operational Excellence
Chevron Products Company
P. O. Box 1272
Richmond, CA 94802-0272
Tel 510 242 3887
Fax 510 242 3762
PLMI@chevron.com

Dear Mr. Sawyer,

Chevron U.S.A. Inc. (CUSA) appreciates the opportunity to submit comments to Contra Costa Health Services (CCHS) on the draft report from a third party consultant on the process safety evaluation of the Chevron Richmond Refinery, which was conducted at the Refinery from September to November 2013.

CUSA cooperated with the evaluation and devoted significant resources to support the consultant's review. We disagree, however, with many of the consultant's findings, and believe the report inaccurately depicts the Refinery's safety culture. The length of time that the consultant took to complete its work further limits the report's value.

Since the August 6, 2012 incident, CUSA has taken a wide-range of actions not only in response to the fire, but also as part of the Refinery's efforts to continuously improve process safety performance, including –

- A 100% component inspection of carbon steel piping systems identified as potentially susceptible to sulfidation corrosion;
- Improving and developing robust work processes around Damage Mechanism Reviews, and incorporating these DMRs into our Process Hazard Analyses;
- Instituting an improved turnaround work tracking process that incorporates fixed equipment inspection recommendations and work items;
- Implementing an updated protocol for evaluating process leaks to assist in rapid leak response decision-making; and
- Engaging with employees to identify other opportunities for improving the site's safety culture.

Notwithstanding our disagreements with the consultant, we would like to acknowledge the effort and professionalism of you and your staff during the assessment review. We recognize the benefit of external perspectives on safety culture and safety performance, and remain committed to working with you to address the CCHS's concerns. Safety has been and will continue to be a core value for CUSA.

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