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June 29, 2015

Mr. Paul Atkociunas, OSC
U.S. Environmental Protection Agency, Region 5
Emergency Response Branch, Response Section # 4
77 West Jackson Blvd. (SE-5J)
Chicago, Illinois 60604

Dear Mr. Atkociunas,

Reference: Six Month Progress Report
October 16, 2014 to April 15, 2015
BP Products North America Incorporated
Site # 215 - Indianapolis Terminal
2500 North Tibbs Avenue
Indianapolis, Marion County, Indiana 46222
Stantec Project No.: 182612296

This six month progress report has been prepared by Stantec Consulting Services Inc. (Stantec) on behalf of BP Products North America, Inc. (BP). The progress reporting provided herein has been prepared in compliance with paragraph V.39 of the Administrative Order (the Order).

1. Progress Made This Reporting Period:

- a. Continued maintenance on the groundwater extraction and treatment system (GWET);
- b. Conducted the monthly Little Eagle Creek surface water sampling event on October 17, November 12, and December 17, 2014; and January 21, 2015;
- c. Conducted monthly manual light non-aqueous phase liquid (LNAPL) recovery on October 29, December 1, and 19, 2014; January 30 and February 25, 2015;
- d. Conducted the Fourth Quarter 2014 groundwater monitoring event from December 1 through December 12, 2014;
- e. Completed upgrade of the GWET system as specified in the Modified GWET Data Package which included the following:
 - i. Obtained bids from subcontractors and vendors for the upgrades of the GWET system;
 - ii. Selected New Terra and Brehob as the subcontractors to assist in completing upgrades to the GWET system;
 - iii. Awarded Harrington the contract to supply the new bag filter housings for the upgraded GWET system;



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- iv. Completed system upgrades for the (GWET) system on March 30, 2015;
 - v. Started upgraded system and initiated verification of all process safety devices (PSDs) on March 31, 2015; and
 - vi. Completed verification of PSDs allowing the system to operate continuously on April 2, 2015.
- f. Installed a new heater element on December 16, 2014 in the heating unit located on the north end of the system;
- g. Completed the carbon exchange for the three lead carbon vessels on January 16, 2015; and
- h. Conducted the First Quarter 2015 groundwater monitoring event from March 23 to April 10, 2015.

2. Difficulties Encountered and Corrective Actions Taken:

- a. An LEL alarm caused the system to shut down on October 15, and 19, 2014. System data was analyzed and no LEL measurements of greater than 5% were recorded. No specific cause for the shutdowns was identified. The system was returned to service within one (1) business day following each of the shutdowns.
- b. Rainwater accumulated in the GWET system's secondary containment on November 23, 2014, causing the system to shut down. The rainwater was removed and the system restarted on November 24, 2015.
- c. High pressure on the transfer pump, due to loading of the particulate bag filters, caused the system to shut down on November 26, 2014, December 26, 2014, and January 28, 2015. The bag filters were replaced and the system restarted within one day of shut down.
- d. During routine maintenance on December 5, 2014, a small drip was identified under the bag filter housings and was repaired the same day.
- e. Due to changes in the Verizon cellular service, the programmable logic controller (PLC) for the GWET system required a software update to allow continued communication with the cellular system. On December 9, 2014, the GWET system was shut down to allow the PLC to be shipped to the manufacturer to receive the



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necessary updates. The PLC was re-installed on December 11, 2014, and function tests were conducted on December 11, and 12, 2014 to verify proper operation.

- f. Monthly Little Eagle Creek Surface water sampling was not conducted during February due to frozen conditions. Two separate attempts were made to sample the creek on February 18, and 24, 2015, but frozen conditions prevented sampling; and
- g. Monthly Little Eagle Creek Surface water sampling was not conducted during March 2015 due to the system being down for upgrades as previously cleared with the OSC.

4. Anticipated Activities:

- a. Continue to provide oversight and documentation support to the OSC;
- b. Perform the Little Eagle Creek monthly surface water sampling events, weather permitting;
- c. Continue monthly LNAPL recovery and operation and maintenance (O&M) of the GWET;
- d. Optimize operation of the upgraded GWET system;
- e. Verify continued groundwater capture from the upgraded GWET system;
- f. Prepare Monthly Progress Reports;
- g. Prepare Monthly Little Eagle Creek Surface Water Sampling Reports;
- h. Prepare Quarterly Groundwater Monitoring Reports; and
- i. Prepare a Final Report.

5. Deliverables:

Deliverable	Date(s) Delivered
Monthly Progress Reports	11/17/2014, 12/15/2014, 1/15/2015, 2/16/2015, 3/16/2015, and 4/15/2015
Little Eagle Creek Surface Water Sampling Reports	11/14/2014 (in Third Quarter Groundwater Report), 12/8/2014, 1/8/2015, 2/10/2015 (in Fourth Quarter Groundwater Report), and 3/3/2015




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Scheduled System Downtime Notification	12/9/2014
Revisions to the Modified GWET Design Package	11/24/2014
Six Month Progress Report April-October 2014	12/18/2014
Third & Fourth Quarter 2014 Groundwater Monitoring Reports	11/14/2014 and 2/10/2015

If you have any questions or require additional information, please contact Bruno Mancini of BP at (216) 271-8852, or John McInnes of Stantec at (317) 876 8375, extension 226.

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cc: Mr. Bruno Mancini, BP