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June 6, 2014

Attention: 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 - 3590

Dear Mr. Atkociunas,

Reference: Six Month Progress Report
November 2013 to April 2014
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. Conducted semi-monthly manual LNAPL recovery and related breathing zone monitoring throughout the reporting period;
- b. Conducted monthly surface water sampling in Little Eagle Creek (November 13, 2013; March 17, 2014; and April 21, 2014);
- c. Replaced recovery well (RW) and trench well (TW) vaults with new flush mounts;
- d. Installed new flush-mount protective covers for monitoring wells OW-27, OW-28, OW-29, DHW-78, DHW-89, DHW-95, DHW-98, and DHW-99 between March 26 and March 28, 2014. During December 2013, monitoring wells on the adjacent property to the south were covered with temporary steel protective covers to prevent damage during construction. During this reporting period, the construction activities south of the Site had progressed to the point where monitoring wells could be safely accessed;
- e. Abandoned monitoring wells OW-24, OW-25, DHW-79, and DHW-90 located on the adjacent property to the south. The wells were abandoned by an Indiana licensed well driller on March 28, 2014 due to the installation of new solar panels in this area. Despite the abandonment of these monitoring wells, the remaining monitoring well



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network is sufficient to demonstrate delineation of constituents of potential concern (COPC) in groundwater (refer to attached Figure); and

- f. Modified the carbon treatment system in order to eliminate the effect of the fouled influent screens on April 9, 2014.

2. Difficulties Encountered and Corrective Actions Taken:

- a. October 31 and December 21, 2013 and April 3, 2014 - Rainwater accumulated in the GWET system's secondary containment causing the system to shut down;
- b. November 11, 14, 18, 19, and 20, and December 15, 2013, January 26, February 24 and 28, and March 2, 14, and 30, 2014 - High pressure from loading of the particulate bag filters caused the system to shut down;
- c. November 15 through November 18, 2013 - Disruption with the wireless service, which did not allow the system to call out if there was an alarm, caused the system to be shut down;
- d. December 27, 2013 - During a system inspection, field staff noticed a small drip originating from the intake manifold. The manifold was fixed and the system returned to service on December 30, 2013;
- e. December 2013 and January and February 2014 - Little Eagle Creek sampling events were not conducted due to the Creek being frozen or high water levels;
- f. January 3 through 15, January 26 through February 3, February 7 through 10, February 24, February 28 and March 2 through 14, 2014 - Freezing issues due to extreme cold weather caused the system to be down;
- g. February 18, 2014 - system was down for less than a day due to snow melt causing an alarm in the secondary containment;
- h. March 24, 2014 - Moisture was observed below one of the bag filter housings during a post O&M system inspection. A butterfly valve was taken apart, cleaned, inspected, greased, and reinstalled without any further moisture problems on March 25, 2014; and,
- i. March 28, 2014 - DHW-94 was not able to be relocated after construction activities.



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4. Anticipated Activities:

- a. Continue to provide oversight and documentation support to the OSC;
- b. Conduct Little Eagle Creek monthly surface water sampling;
- c. Continue to operate pump and treat system;
- d. Prepare Monthly Progress Report;
- e. Prepare Monthly Surface Water Monitoring Report;
- f. Prepare Quarterly Groundwater Monitoring Report; and
- g. Little Eagle Creek Natural Resource Assessment.

5. Deliverables:

Deliverable	Date(s) Delivered
Monthly Progress Report	11/15/13, 12/13/13, 1/15/14, 2/14/14, 3/14/14, 4/15/14
Quarterly Groundwater Report	12/5/2013, 2/26/2014
Six Month Progress Report- May 2013 to October 2013	12/18/13
Monthly Surface Water Report	12/20/13, 1/17/14, 1/28/14, 2/28/14, 3/21/14
Revised Investigation Report	12/20/13
Quality Assurance Project Plan Addendum – March 11, 2014	3/11/2014
Removal Work Plan	3/24/14



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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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