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December 18, 2014

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
April 16, 2014 to October 15, 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. Completed the design for the upgrade of the Groundwater Extraction and Treatment (GWET) system which was submitted to the U.S. EPA on the October 3, 2014;
- b. April 18 through May 2, 2014 - Carbon change out and reconfiguration of the lead and lag vessels were completed;
- c. Conducted semi-monthly manual LNAPL recovery and related breathing zone monitoring throughout the reporting period;
- d. Conducted monthly surface water sampling in Little Eagle Creek (April 21, 2014; May 21, 2014; June 16, 2014; July 18, 2013; August 25, 2014; and September 19, 2014);
- e. Completed carbon exchange for the three lead carbon vessels on April 24, 2014;
- f. Reconfigured treatment system plumbing so that the vessels with new carbon serve as the lag vessels and the former lag vessels become the lead vessels;
- g. Conducted the second quarter groundwater monitoring and sampling event from June 2 through June 12, 2014;
- h. Conducted a bail-down test on August 4, 2014 to obtain data to evaluate the transmissivity of LNAPL in DHW-44;



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- i. Performed an internal field audit per Section 4.1.1 of the QAPP during routine Operation & Maintenance activities on September 2, 2014. The audit revealed no material deviations from the QAPP or O&M Plan that would adversely impact data quality or system operation; and
- j. Conducted the third quarter groundwater monitoring and sampling event from September 8 through September 12, 2014.

2. Difficulties Encountered and Corrective Actions Taken:

- a. April 15, May 15, May 22, August 20, and September 26, 2014 - High pressure on the transfer pump due to loading of the particulate bag filters caused the system to shut down. The bag filters were replaced and the system restarted in less than a day;
- b. May 27, 2014 - The system was shut down for two (2) days as a precautionary measure due to a protective safety device, LEL meter, needing to be serviced;
- c. June 2 and September 10, 2014 - Rainwater accumulated in the GWET system's secondary containment causing the system to shut down. The groundwater was removed and the system restarted;
- d. June 11 through June 15, 2014; August 7, 2014; August 15, 2014; and September 13 and 15, 2014; October 7 and 9, 2014 - An LEL alarm caused the system to shut down. Follow up monitoring with a 4-gas meter did not confirm the presence of elevated LEL atmosphere in the enclosure. Further, the system data was analyzed and no LEL measurements of greater than 10% were recorded;
- e. June 24, 2014 - A storm postponed work during O&M activities causing the system to be left down overnight. O&M activities were concluded on June 25, 2014 and the system was turned back on; and
- f. July 11, 2014 - The system was shut down for four (4) days to repair a corroded pipe.

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;



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- d. Continue LNAPL recovery;
- e. Prepare Monthly Progress Reports;
- f. Prepare Monthly Surface Water Monitoring Reports;
- g. Prepare Quarterly Groundwater Monitoring Reports;
- h. Continue troubleshooting the system LEL meter; and
- i. Upgrade the existing groundwater extraction and treatment (GWET) system as outlined in the October 3, 2014 Modified GWET Data Package.

5. Deliverables:

Deliverable	Date(s) Delivered
Monthly Progress Report	5/15/2014, 6/16/2014, 7/15/2014, 8/15/2014, 9/15/2014, 10/15/2014
Quarterly Groundwater Report	5/5/2014, 8/12/2014
Revised Removal Work Plan	5/30/2014
Six Month Progress Report- May 2013 to October 2013	6/6/2014
Monthly Surface Water Report	6/10/2014, 7/8/2014, 8/29/2014, 9/29/2014
Light Non-Aqueous Phase Liquid Recovery Operations and Maintenance Plan	7/9/2014
Revised Light Non-Aqueous Phase Liquid Recovery Operations And Maintenance Plan	8/8/2014
Little Eagle Creek Sediment Sampling and Benthic Community	9/2/2014



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Assessment

Modified GWET Design Package 9/8/2014

Revised Modified GWET Data 10/3/2014
Package

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.

Reviewed by:

John W. McInnes, LPG
Managing Principal Geologist

cc: Mr. Bruno Mancini, BP