

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
BP Terminal Indianapolis - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #1
Initial PolRep
BP Terminal Indianapolis
Z5K6
Indianapolis, IN
Latitude: 39.8027163 Longitude: -86.2160273

To: Matt Mankowski, U.S. EPA
Carolyn Bohlen, U.S. EPA
Bill Wagner, U.S. EPA
Yolanda Bouchee-Cureton, U.S. EPA
Doug Winder, U.S. EPA
USCG PolRep Distribution, USCG
John Maritote, U.S. EPA
Patrick Ryan, USCG
Mark Cochran, Cincinnati Finance Center
Jaime Brown, ERS4

From: Shelly Lam, On-Scene Coordinator

Date: 11/22/2011

Reporting Period: November 14-22, 2011

1. Introduction

1.1 Background

Site Number:	Z5K6	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	OPA	Response Type:	PRP Oversight
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:		Start Date:	11/14/2011
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:	E11504	Reimbursable Account #:	

1.1.1 Incident Category

Manufacturing/processing/maintenance - oil and gas refining

1.1.2 Site Description

The BP Indianapolis Terminal (the Site) has operated as a petroleum storage and distribution facility since 1941. The Site consists of an administrative building, service garage, petroleum distribution rack, miscellaneous warehouse and pumping station sheds, oil/water separator, underground storage tanks (UST) and aboveground storage tanks (AST), which contain gasoline, diesel, ethanol, furnace oil, and heating oil. AST capacity ranges from 672,000 to 3,360,000 gallons, with a total capacity exceeding 18,000,000 gallons.

1.1.2.1 Location

The Site is a 41-acre bulk terminal located at 2500 North Tibbs Avenue in Indianapolis, Marion County, Indiana, 46222. Site coordinates are 39.8027163 latitude and 86.2160273 longitude. The Site is bordered by commercial property to the north; shopping plaza to the northeast; Ferguson Industrial Plastics Division and a fire station to the east; undeveloped property to the south; and Little Eagle Creek to the west.

1.1.2.2 Description of Threat

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Environmental investigations conducted by BP and its consultants documented that there are petroleum-related groundwater impacts from benzene, toluene, ethylbenzene, xylenes (BTEX), methyl tertiary butyl ether (MTBE), naphthalene, ethanol, and polynuclear aromatic hydrocarbons (PAH) including benzo(a)anthracene, benzo(a)pyrene, benzo(k)fluoranthene, chrysene, dibenz(a,h)anthracene, and indeno(1,2,3-cd)pyrene beneath the Site. Light Non-Aqueous Phase Liquid (LNAPL) has been found in a shallow aquifer beneath the Site and at seeps

along Little Eagle Creek. This LNAPL was detected in on-Site monitoring wells at a maximum thickness of 5.83 feet in monitoring well DHW-110 in June 2008.

Recovery efforts to date have included using absorbent booms and pads in monitoring wells and Little Eagle Creek, manual bailing of monitoring wells, operation of a groundwater pump and treat system as a biosparge system, phytoremediation, and operation of an automated passive skimmer. Between 2006 and February 2010, 190.36 gallons of LNAPL were recovered.

The Site was previously in the Voluntary Remediation Program (VRP) of the Indiana Department of Environmental Management (IDEM). IDEM referred the Site to the U.S. Environmental Protection Agency (EPA) on December 13, 2010.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

On November 14, 2011, EPA executed an Administrative Order by Consent (AOC) under Section 311 of the Clean Water Act. The AOC requires BP to implement removal measures to prevent migration of petroleum hydrocarbon impacted groundwater into Little Eagle Creek.

2.1.2 Response Actions to Date

To date, BP has notified EPA of its designated contractor and project coordinator. Additionally, as per Section 31 of the AOC, BP has continued removal actions previously approved by IDEM including LNAPL recovery, quarterly surface monitoring in Little Eagle Creek, and quarterly sampling of groundwater from monitoring wells. In addition, BP has initiated construction of pump-and-treat system as a interim removal action, in accordance with Section 31(d) of the AOC.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

EPA executed Docket No. V-W-11 C-984, an AOC with BP on November 14, 2011.

2.1.4 Progress Metrics

Below is a schedule of items included in the AOC:

Milestone	Date Due	Date Done
Effective Date (ED)		11/14/2011
LNAPL Recovery, Quarterly Creek & MW Sampling	11/14/2011	11/14/2011
Contractor Notification	11/21/2011	11/21/2011
Project Coordinator Notification	11/21/2011	11/21/2011
HASP Submittal	12/6/2011	
QAPP Submittal	12/6/2011	
On-Site Construction	12/14/2011	
Construction Complete	2/12/2012	
Investigation Work Plan	2/12/2012	

2.2 Planning Section

2.2.1 Anticipated Activities

The following sections discuss planned response activities and next steps.

2.2.1.1 Planned Response Activities

During the next reporting period, BP will submit a Health and Safety Plan (HASP) and Quality Assurance Project Plan (QAPP). BP will continue LNAPL recovery and quarterly groundwater monitoring, and initiate monthly sampling of Little Eagle Creek

2.2.1.2 Next Steps

BP will continue construction of the interim pump-and-treat system and submit a work plan for additional investigation.

2.2.2 Issues

None

2.3 Logistics Section

Not applicable (NA)

2.4 Finance Section

2.4.1 Narrative

EPA On-Scene Coordinator (OSC) Shelly Lam requested \$50,000 from the Oil Spill Liability Trust Fund. Federal Project Number (FPN) E11504 was assigned.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
TAT/START	\$25,000.00	\$13,899.00	\$11,101.00	44.40%

Intramural Costs				
USEPA - Direct	\$25,000.00	\$10,681.34	\$14,318.66	57.27%
Total Site Costs	\$50,000.00	\$24,580.34	\$25,419.66	50.84%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

BP is preparing a HASP to submit to EPA for approval.

2.6 Liaison Officer

NA

2.7 Information Officer

NA

2.7.1 Public Information Officer

2.7.2 Community Involvement Coordinator

3. Participating Entities

3.1 Unified Command

NA

3.2 Cooperating Agencies

IDEM

4. Personnel On Site

NA

5. Definition of Terms

AOC	Administrative Order by Consent
AST	Aboveground Storage Tank
BTEX	Benzene, toluene, ethylbenzene, xylenes
EPA	Environmental Protection Agency
FPN	Federal Project Number
HASP	Health and Safety Plan
IDEM	Indiana Department of Environmental Management
LNAPL	Light Non-Aqueous Phase Liquid
MTBE	Methyl tertiary butyl ether
NA	Not Applicable
OSC	On-Scene Coordinator
PAH	Polynuclear aromatic hydrocarbons
PRP	Potentially Responsible Party
QAPP	Quality Assurance Project Plan
UST	Underground Storage Tank
VRP	Voluntary Remediation Program

6. Additional sources of information

6.1 Internet location of additional information/report

Additional information can be found at www.epaosc.org/bpterminalindy.

6.2 Reporting Schedule

The next PolRep will be submitted in December 2011.

7. Situational Reference Materials

NA