

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #2
Progress PolRep
BP Terminal Indianapolis

Indianapolis, IN
Latitude: 39.8027163 Longitude: -86.2160273

To:
From: Shelly Lam, On-Scene Coordinator
Date: 12/15/2011
Reporting Period: November 23 - December 15, 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

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.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

BP has been conducting sampling, monitoring, and cleanup at the Site since 1988. Data collected by BP shows that BTEX, MTBE, and PAHs have been found across the Site and in Little Eagle Creek as free and dissolved-phase product.

BP's Semi-Annual Groundwater Report for the facility dated July 2010 documented that LNAPL continued to be detected in certain on-Site wells and dissolved phase compounds were as high as 23,900 micrograms per liter (ug/L) for benzene in monitoring well DHW-69; 58,200 ug/L for toluene in monitoring well DHW-72; 2,410 ug/L for ethylbenzene in DHW-55; 9,720 ug/L for xylenes in DHW-72; 262 ug/L for MTBE in DHW-54; and 1,150 ug/L for naphthalene in DHW-55. As of February 24, 2010, monitoring well DHW-96, adjacent to Little Eagle Creek, had a benzene concentration of 4,250 ug/L.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

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. 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

During the reporting period, BP conducted the following activities:

- Conducted oversight of continued pump and treat system shakedown and electrical upgrades;
- Conducted quarterly groundwater monitoring, and quarterly sampling of Little Eagle Creek per IDEM-approved sampling and analysis plan dated October 27, 2008 (will transition to updated sampling and analysis plan upon approval by EPA). EPA representatives were present on site for a portion of the sampling;
- Conducted semi-monthly operation and maintenance of light non-aqueous phase liquid (LNAPL) recovery system;
- Conducted semi-monthly manual LNAPL recovery and related breathing zone monitoring;
- Completed clean water wet test of groundwater extraction and treatment system and confirmed integrity of piping (i.e., no leaks);
- Test ran treatment system and confirmed effectiveness of treatment through the collection and analysis of influent and effluent samples;
- Continued progress on constructing an internet-based portal to function as document repository; and
- Initiated drafting of Investigation Work Plan per paragraph V.31 of the Order.

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 | 12/6/2011 |
| QAPP Submittal | 12/6/2011 | 12/6/2011 |
| On-Site Construction Initiated | 12/14/2011 | 10/2011 |
| 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 continue recover free product and optimize pump and treat system in anticipation of start up.

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

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

BP submitted a HASP to EPA for approval.

2.6 Liaison Officer

NA

2.7 Information Officer

NA

2.7.1 Public Information Officer

NA

2.7.2 Community Involvement Coordinator

NA

3. Participating Entities

3.1 Unified Command

NA

3.2 Cooperating Agencies

IDEM

4. Personnel On Site

2 EPA OSCs

1 Superfund Technical Assessment and Response Team (START) contractor

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 |
| START | Superfund Technical Assessment and Response Team |
| ug/L | micrograms per liter |
| 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 January 2012.

7. Situational Reference Materials

NA