

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
Z5K6
Indianapolis, IN
Latitude: 39.8027163 Longitude: -86.2160273

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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

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	\$19,800.00	\$5,200.00	20.80%
Intramural Costs				
USEPA - Direct	\$25,000.00	\$10,681.34	\$14,318.66	57.27%
Total Site Costs	\$50,000.00	\$30,481.34	\$19,518.66	39.04%

* 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 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

POLREP #2 Last Updated 12/15/2011