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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #3**
Progress PolRep
BP Terminal Indianapolis

Indianapolis, IN
Latitude: 39.8027163 Longitude: -86.2160273

To:
From: Shelly Lam, On-Scene Coordinator
Date: 1/17/2012
Reporting Period: December 16 - January 15, 2012

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:

- Continued pump and treat system fine tuning;
- Collected monthly system samples;
- 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;
- Continued progress on constructing an internet-based portal to function as document repository;
- Continued drafting of Investigation Work Plan per paragraph V.31 of the Order; and
- Submitted revised Quality Assurance Project Plan (QAPP), Sampling and Analysis Plan (SAP), and Health and Safety Plan (HASP) on January 13, 2012.

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	11/14/2011	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
HASP/QAPP Approval		1/5/2012
HASP/QAPP Revisions	1/12/2012	
LNAPL Recovery, Creek Sampling Locations Notification, Quarterly MW Sampling	1/27/2012	
Creek Sampling Location Approval		
Monthly Creek Sampling		
On-Site Construction	12/14/2011	
Construction Complete	2/12/2012	
Investigation Work Plan	2/12/2012	

R5 Priorities Summary	
Integrated River Assessment	Miles of river systems cleaned and/or restored Cubic yards of contaminated sediments removed and/or capped Gallons of oil/water recovered Acres of soil/sediment cleaned up in floodplains and riverbanks
Stand Alone Assessment	Acres Protected Number of contaminated residential yards cleaned up Human Health Exposures Avoided Number of workers on site

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 to provide oversight and documentation support to EPA's On-Scene Coordinator (OSC);
- Continue to optimize pump and treat system in anticipation of start up;
- Conduct initial aquifer testing after system troubleshooting is complete; and
- Repair of damaged carbon vessels.

2.2.1.2 Next Steps

BP will submit a work plan for additional investigation.

2.2.2 Issues

During system startup activities, BP discovered that two of the carbon vessels were damaged and needed repair. The system can operate without the damaged carbon vessels. However, BP is developing plans for repair of the carbon vessels.

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

EPA has conditionally approved BP's HASP, pending minor changes. BP will conduct all environmental work at the Site under the HASP.

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

No EPA personnel or contractors were on-site during the reporting period.

5. Definition of Terms

AOC	Administrative Order by Consent
AST	Aboveground Storage Tank
BTEX	Benzene, toluene, ehtylbenzene, 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 teriary butyl ether
NA	Not Applicable
OSC	On-Scene Coordinator
PAH	Polynuclear aromatic hydrocarbons
PRP	Potentially Responsible Party
QAPP	Quality Assurance Project Plan
SAP	Sampling and Analysis 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 OSC will submit the next PolRep in February 2012.

7. Situational Reference Materials

NA