

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #4
Special PolRep
BP Terminal Indianapolis

Indianapolis, IN
Latitude: 39.8027163 Longitude: -86.2160273

To:
From: Shelly Lam, On-Scene Coordinator
Date: 2/8/2012
Reporting Period: February 5 - 8, 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

On February 6, 2012, BP reported to EPA's On-Scene Coordinator (OSC) and the National Response Center (NRC) (#1002234) a discharge of 39,510 gallons of petroleum-contaminated water at the BP facility. The spill occurred on February 5, 2012, due to a programming or mechanical failure with the on-Site treatment system. The contaminated water flowed approximately 130 feet and infiltrated into the soil. BP recovered approximately 900 gallons. Although it appears that the discharge did not flow into Little Eagle Creek, the spill is only 150 feet from the creek. At the request of the OSC, BP is conducting soil, groundwater, and surface water sampling. Additionally, BP is developing a plan to mitigate and contain the flow of contaminated water so that there are little to no impacts to the creek.

2.1.2 Response Actions to Date

OSC Lam met with representatives of BP and their consultant, Stantec, at the facility on February 7, 2012 to view the spill location and discuss response actions. The discharged water contained high concentrations of iron. As such, the spill location could be identified by iron staining on the ground.

BP has temporarily shut down the treatment system until a third-party conducts a root-cause analysis and a remedy is implemented. On February 7th, BP conducted surface water at four locations on Little Eagle Creek. BP collected groundwater samples from monitoring wells MW-11, DHW-86, and DHW-87, all of which are between the spill location and the creek. On February 8th, BP submitted a sampling plan specific to the spill.

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

See previous Pollution Reports (PolRep) for a schedule of dealines for the AOC.

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

BP will:

- Conduct soil sampling in the spill location;
- Collect surface water and groundwater samples on a weekly basis; and
- Continue addressing items in the AOC.

2.2.1.2 Next Steps

BP will continue collecting surface water and groundwater samples until the treatment system is operational again.

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

EPA has approved BP's HASP. 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

Indiana Department of Environmental Management (IDEM)

4. Personnel On Site

EPA's OSC was on-Site on February 7, 2012.

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
NRC	National Response Center
OSC	On-Scene Coordinator
PAH	Polynuclear aromatic hydrocarbons
PolRep	Pollution Report
PRP	Potentially Responsible Party
ug/L	micrograms per liter
UST	Underground Storage Tank

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 on or about February 15, 2012.

7. Situational Reference Materials

NA