

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #24
Progress PolRep
BP Terminal Indianapolis

Indianapolis, IN
Latitude: 39.8027163 Longitude: -86.2160273

To:
From: Shelly Lam, On-Scene Coordinator
Date: 8/16/2013
Reporting Period: July 16 - August 15, 2013

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 storage

1.1.2 Site Description

The BP Indianapolis Terminal (the site) began operating 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 degrees north latitude and 86.2160273 degrees west 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) and dissolved-phase contamination have 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

Refer to previous Pollution Reports (PolRep).

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

BP conducted the following activities during the reporting period:

- a. Conducted semi-monthly operation and maintenance (O&M) on the LNAPL recovery system installed at DHW-110 on July 25 and August 9, 2013.
- b. Conducted semi-monthly manual LNAPL recovery and related breathing zone monitoring on July 25 and August 9, 2013.
- c. Submitted the Response to U.S. EPA Comment Letter Dated July 24, 2013 on August 13, 2013
- d. Temporarily suspended operation of the LNAPL recovery unit on August 5, 2013 to allow for the performance of a bail down test on DHW-110. Limited LNAPL recovery was observed and the bail down test was conducted to evaluate alternatives for future LNAPL recovery from this well.
- e. Initiated LNAPL bail down test on DHW-110 on August 12, 2013.

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. BP requested a deadline extension for submittal of the Investigation Report.

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 (HQA)		1/5/2012
HASP/QAPP Revisions	1/13/2012	1/13/2012
LNAPL Recovery, Creek Sampling Locations Notification, Quarterly MW Sampling	1/27/2012	1/27/2012
Creek and Groundwater Sampling Locations Revisions	2/17/2012	2/21/2012
Creek Sampling Location Approval		2/21/2012
Monthly Creek Sampling	3/6/2012	3/6/2012
On-Site Construction	12/14/2011	8/30/2011
Construction Complete	3/19/2012	3/19/2012
Investigation Work Plan	2/12/2012	2/12/2012
Revised Work Plan	4/13/2012	4/13/2012
Investigation Complete (IC)		
- Supplemental soil characterization		6/18/2012
- Supplemental groundwater characterization		6/22/2012
- Supplemental surface water characterization (normal flow)		10/8/2012
- Supplemental surface water characterization (low flow)		6/27/2012
- Supplemental sediment characterization		6/27/2012
- Natural Resources Assessment		
- Sediment toxicity testing and analysis (benthic testing)		
- Aquifer testing		10/21/2012
Investigation Report	1/31/2013	1/31/2013
Investigation Report Approval		
Removal Work Plan		
Removal Work Plan Approval		
Removal		
Final Report, 60 days after removal is complete		

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).

- a. Revise the work plan addendum as indicated in the Response to U.S. EPA Comment letter dated July 24, 2013.
- b. Commence the Little Eagle Creek benthic community assessment and toxicity testing, which is scheduled for August 19, 2013.

c. Perform the Little Eagle Creek monthly surface water sampling event, which is scheduled to coincide with the benthic community assessment and toxicity testing on August 19, 2013.

d. Continue semi-monthly LNAPL recovery and O&M.

EPA will provide comments on BP's response to comments for the Investigation Report.

2.2.1.2 Next Steps

BP will continue addressing items in the Work Plan.

2.2.2 Issues

During the reporting period, the pump and treat system was operational for 95% of the time. The only unscheduled down time was related to high pressure alarms associated with particulate accumulation in the bag filters. In each case, replacement of the bag filter was sufficient to reset the alarms. The project team is in the process of optimizing bag filter size and frequency of scheduled bag filter replacement for the carbon-only treatment configuration.

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 approved BP's Health and Safety Plan (HASP). BP is conducting 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

Marion County Public Health Department

4. Personnel On Site

EPA was not on-site during the reporting period.

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
O&M	Operation and Maintenance
OSC	On-Scene Coordinator
PAH	Polynuclear aromatic hydrocarbons
PolRep	Pollution Report
PRP	Potentially Responsible Party
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 on or about September 15, 2013.

7. Situational Reference Materials

NA