

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #32
Progress Report
BP Terminal Indianapolis

Indianapolis, IN
Latitude: 39.8027163 Longitude: -86.2160273

To:
From: Shelly Lam, On-Scene Coordinator
Date: 4/17/2014
Reporting Period: March 16 - April 15, 2014

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

During the reporting period, BP conducted the following actions:

- Continued maintenance on the groundwater extraction and treatment system;
- Conducted monthly Little Eagle Creek surface water sampling event on March 17, 2014;
- On December 20, 2013, monitoring wells on the adjacent property to the south were covered with temporary protective steel covers to prevent damage during construction. During this reporting period, construction activities on the property south of the site had progressed to the point where monitoring wells could be safely accessed;
- On March 28, 2014, monitoring wells OW-24, OW-25, DHW-79, and DHW-90 (located on the adjacent property to the south) were abandoned by an Indiana licensed well driller due to the installation of new solar panels in this area. Despite the abandonment of these monitoring wells, BP believes that the remaining monitoring well network is sufficient to demonstrate delineation of constituents of concern in groundwater;
- Conducted semi- monthly manual LNAPL recovery on March 21 and April 4, 2014
- Modified the carbon system in order to eliminate the effect of the fouled influent screens on April 9, 2014;
- Submitted the February Little Eagle Creek sampling report; and
- Submitted the Removal Work Plan.

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	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 (CS)		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		8/19/2013
- Sediment toxicity testing and analysis (benthic testing)		8/19/2013
- Aquifer testing		10/20/2012
Investigation Report	1/28/2013	1/28/2013
Investigation Report Approval (IRA)		1/21/2014
Removal Work Plan	3/24/2014	3/24/2014
Removal Work Plan Approval (RWA)		
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);
- Perform Little Eagle Creek monthly surface water sampling; and

- Continue semi-monthly LNAPL recovery and system operation & maintenance (O&M).

2.2.1.2 Next Steps

EPA will review the Removal Work Plan.

2.2 Issues

Monitoring well DHW-94 was not able to be located after construction activities.

During the reporting period, the pump and treat system was operational 88.5% of the time. The following unscheduled down times occurred:

- March 14 and 30, 2014 - High pressure on the transfer pump from loading of the particulate bag filters caused the system to shut down. In both instances, the system was back up and running within one (1) day;
- March 24, 2014 - Moisture was observed below one of the bag filter housings during a post O&M system inspection. A butterfly valve was taken apart, cleaned, inspected, greased, and reinstalled without any further moisture problems on March 25, 2014;
- April 3, 2014 - System was down for less than one (1) day due to rainwater causing an alarm in the secondary containment.

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 is conducting all environmental work at the site under an approved Health and Safety Plan (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

NA

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
START	Superfund Technical Assessment and Response Team
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 May 15, 2014.

7. Situational Reference Materials

NA