

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #34
Progress
BP Terminal Indianapolis

Indianapolis, IN
Latitude: 39.8027163 Longitude: -86.2160273

To:
From: Paul Atkociunas, On-Scene Coordinator
Date: 6/17/2014
Reporting Period: May 15 - June 16, 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 May 21, 2104;
- Completed the second quarter groundwater sampling event from June 2 through 12, 2014;
- Conducted semi-monthly manual LNAPL recovery on May 16 and June 2, 2014.

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. On June 9, 2014, EPA approved the Revised Removal Work Plan, dated May 30, 2014. The plan is incorporated into and fully enforceable under the AOC. The work plan and approval letter can be located in the documents section of the web site.

| 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) | | 6/9/2014 |
| 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

BP will proceed with the implementation of the Revised Removal Work Plan in accordance with the schedule outlined in Section 8 of the approved plan.

2.2 Issues

During the reporting period, the pump and treat system was operational 82.1% of the time. The following unscheduled down times occurred:

- On May 15, 2014, the high pressure on the transfer pump due to loading of the particulate bag filters caused

the system to shut down. The system was back up and running within one (1) day;

- On May 22, 2014, a high high alarm in the oil water separator caused the system to shut down. This alarm was likely due to fouled bag filters that caused reduced flow through the system. The system was back up and running within one (1) day;
- On May 27, 2014, the system was shut down as a precautionary measure due to a protective safety device, LEL meter, needing to be serviced. The system was down for two (2) days;
- Rainwater accumulated in the GWET system's secondary containment causing the system to shut down on June 2, 2014. The system was down less than one (1) day; and
- On June 11, 2014, an LEL alarm caused the system to shut down. Follow up monitoring with a 4-gas meter did not confirm the presence of elevated LEL atmosphere in the enclosure. Further, the system data was analyzed and no LEL measurements of greater than 10% were recorded. No specific cause for the shutdown was identified. The system will continue to be monitored. The system was down for three (3) days.

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 |
| 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 July 20, 2014.

7. Situational Reference Materials

NA