

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #36  
Progress Polrep  
BP Terminal Indianapolis  
Z5K6  
Indianapolis, IN  
Latitude: 39.8027163 Longitude: -86.2160273

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**Date:** 9/17/2014

**Reporting Period:** August 15 - September 14, 2014

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	Z5K6	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	
<b>Response Authority:</b>	OPA	<b>Response Type:</b>	PRP Oversight
<b>Response Lead:</b>	PRP	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>		<b>Start Date:</b>	11/14/2011
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>		<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>	E11504	<b>Reimbursable Account #:</b>	

#### 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 (GWET)
- Conducted the monthly manual light non-aqueous phase liquid (LNAPL) recovery on August 6, 2014.
- Conducted the monthly Little Eagle Creek surface water sampling event on August 25, 2014.
- Performed an internal field audit per Section 4.1.1 of the Quality Assurance Project Plan (QAPP) during routine Operation & Maintenance activities on September 2, 2014; and
- Conducted the third quarter groundwater monitoring event from September 7 - 12, 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 August 14, 2104, EPA approved a Revised LNAPL Recovery Operations and Maintenance Plan; the plan and approval letter can be located in the Documents Section of the website outlined below.

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 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. The Final Design of the Modified GWET System was received and is under EPA review.

### 2.2 Issues

During the reporting period, the pump and treat system was operational 92.3% of the time. The following unscheduled down times occurred:

- On August 15 and September 13, 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 5% were recorded. No specific cause for the shutdown was identified. The system was returned to service within one (1) business day and will be continued to be monitored.
- On August 20, 2014, high pressure on the transfer pump due to loading of the particulate bag filters caused the system to shut down. The system was returned to service within one (1) day.
- On September 10, 2014, rainwater accumulated in the GWET's secondary containment causing the system to shut down. The system was returned to service within one (1) day.

### 2.3 Logistics Section

Not applicable (NA)

### 2.4 Finance Section

#### 2.4.1 Narrative

Federal Project Number (FPN) E11504 is assigned to this project. The total approved ceiling is \$249,999.

#### Estimated Costs \*

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
U.S. Coast Guard	\$0.00	\$21,178.43	(\$21,178.43)	0.00%
START - Weston	\$146,500.00	\$143,534.00	\$2,966.00	2.02%
START - Tetra Tech	\$25,000.00	\$8,500.00	\$16,500.00	66.00%
<b>Intramural Costs</b>				
USEPA - Direct	\$30,000.00	\$24,500.00	\$5,500.00	18.33%
USEPA - InDirect	\$34,574.36	\$22,400.00	\$12,174.36	35.21%
<b>Total Site Costs</b>				
	\$236,074.36	\$220,112.43	\$15,961.93	6.76%

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

### 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
GWET	Groundwater Extraction and Treatment System
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](http://www.epaosc.org/bpterminalindy).

#### 6.2 Reporting Schedule

The OSC will submit the next PolRep on or about October 17, 2014

### 7. Situational Reference Materials

NA

POLREP #36 Last Updated 9/17/2014