

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #53
Progress Polrep
BP Terminal Indianapolis
Z5K6
Indianapolis, IN
Latitude: 39.8027163 Longitude: -86.2160273

To: Matt Mankowski, U.S. EPA
Carolyn Bohlen, U.S. EPA
Bill Wagner, U.S. EPA
Yolanda Bouchee-Cureton, U.S. EPA
Doug Winder, U.S. EPA
USCG PolRep Distribution, USCG
John Maritote, U.S. EPA
Patrick Ryan, USCG
Mark Cochran, Cincinnati Finance Center
Jaime Brown, ERS4

From: Paul Atkociunas

Date: 2/16/2016

Reporting Period: January 15 to February 14, 2016

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 (PolReps).

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

Please refer to previous Polreps for actions prior to this reporting period. During the reporting period, Kinder Morgan Liquids Terminals LLC / BP conducted the following actions:

- Conducted routine maintenance on the groundwater extraction and treatment system.
- Conducted the monthly light non-aqueous phase liquid (LNAPL) recovery on January 15, 2016.
- Monthly Little Eagle Creek surface water sampling was not conducted in January due to frozen conditions. Three separate attempts were made to sample the creek on January 22, 25, and 29, 2016, but were unsuccessful.

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. On or about February 1, 2016, BP Products North America sold the terminal to Kinder Morgan. Kinder Morgan Liquids Terminals LLC (KMLT) currently operates the facility. BP Products North America Inc. is the owner of the site. Paragraph 6 of the AOC states the Order applies to persons who succeed to a controlling interest in BP. The AOC also states that any change in ownership or corporate status of Respondent, including but not limited to a transfer of assets or real or personal property relating to the site, will not alter BP's responsibilities under the Order.

2.1.4 Progress Metrics

On September 8, 2014, BP submitted a data package for the design of a Modified GWET system in accordance with the AOC. EPA provided comments and BP submitted a Revised Modified GWET system data package. On October 27, 2014, EPA approved the design in the Modified GWET Data Package, which is incorporated and fully enforceable under 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)		6/9/2014
Removal		3/30/2015
Final Report		

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, KMLT / BP will:

- Continue to provide oversight and documentation support to the OSC;
- Perform the Little Eagle Creek monthly surface water sampling event, weather and stream levels permitting;
- Provide EPA a Capture Zone Analysis Report; and
- Continue monthly LNAPL recovery and operation and maintenance (O&M) of the GWET system.

2.2.1.2 Next Steps

EPA will continue to conduct oversight of the removal action and monitor progress / compliance with the AOC. EPA will review the Capture Zone Analysis Report.

2.2 Issues

None.

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. On October 22, 2014, EPA submitted an OPA90 Removal Project Plan for the site to the USCG. On February 17, 2015, the ceiling for the Oil Spill Liability Trust Fund (OSLTF) costs for the project were increased from \$249,999 to \$310,000.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
U.S. Coast Guard	\$25,604.00	\$25,604.00	\$0.00	0.00%
START - Weston	\$146,500.00	\$146,000.00	\$500.00	0.34%
START - Tetra Tech	\$25,000.00	\$17,600.00	\$7,400.00	29.60%
Intramural Costs				
USEPA - Direct	\$50,000.00	\$44,900.00	\$5,100.00	10.20%
USEPA - InDirect	\$34,575.00	\$30,700.00	\$3,875.00	11.21%
Total Site Costs	\$281,679.00	\$264,804.00	\$16,875.00	5.99%

* 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

KMLT / BP is conducting work associated with the AOC 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
LEL	Lower Explosive Limit
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 March 16, 2016.

7. Situational Reference Materials

NA