



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

December 9, 2009

RE: BP PRODUCTS NORTH AMERICA
LORAIN TERMINAL
12545 AVON-BELDON RD
PERMIT NO. 3IN00059
LORAIN COUNTY

Ms. Leanne Funke, HSSE Advisor
BP Products North America- Lorain Terminal
1887 Gageville Rd.
Grafton, Ohio 44004
~~ASHTABULA~~

Dear Ms. Funke:

On October 29, 2009, an inspection of the above referenced facility was conducted. The facility was represented by Mr. Ron Sheridan, Environmental Control Technician. The purpose of the inspection was to evaluate the operation and maintenance of the treatment system along with the facility's compliance status with respect to the terms and conditions of the above referenced National Pollutant Discharge Elimination System (NPDES) permit.

During the inspection the following items were noted/discussed:

1. The treatment system consists of a 1000 gallon rectangular aeration vault and a 20,000 gallon oil/water separator. The vault is aerated 24 hrs per day 7 days per week. The wastewater is cycled between the two treatment units prior to being discharged through outfall 3IN00059001.
2. The discharge from outfall 3IN00059001 was observed. No oil sheen or other visual impact to the roadside ditch was noted.
3. Toluene continues to have permit limit exceedances at outfall 3IN00059001.
4. During a site inspection on September 9, 2008, a conference call was made to you to discuss the ongoing limit violations for various components of BTEX at outfall 3IN00059001. You indicated that Engineering was reviewing multiple options to determine the most suitable treatment. A letter from you dated October 3, 2008, indicated that multiple options were evaluated and BP settled on putting a small heated building on top of the aerator to protect the water from the outside air during winter. The letter further indicated that BP anticipated having the building designed and installed by the end of 2008. Currently, no building has been installed or alternative solution implemented to eliminate the ongoing limit violations.
5. On September 9, 2008, Mr. Sheridan informed me that some piping underneath the additive dike area may be compromised. This would allow various components of BTEX to infiltrate the piping leading to the oil/water



Ms. Leanne Funke
BP Products North America- Lorain Terminal
December 9, 2009
Page 2

separator during periods when the groundwater level is elevated. Mr. Sheridan indicated that broken piping leading to the separator was located and replaced since the last inspection.

This office has recently reviewed your self-monitoring reports covering the period August 1, 2008 through October 31, 2009 for the referenced facility. Our review indicates violations of the terms and conditions of your NPDES permit. The specific instances of noncompliance are as follows.

Limit Violations

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	34010	Toluene	1D Conc	20	37.	10/28/2008
001	34010	Toluene	1D Conc	20	42.	2/11/2009

No frequency or code violations were noted.

Please be advised that such instances of noncompliance may be cause for enforcement actions pursuant to the Ohio Revised Code, Chapter 6111.

Please respond to this office in writing within 21 days receipt of this letter your intentions to resolve item 4. The letter should include dates, either actual or proposed, for completion of the actions.

Should you have any comments or questions concerning this letter, please feel free to call me at (330) 963-1143.

Respectfully,

Michael W. Stevens

Michael W. Stevens
Environmental Engineer
Division of Surface Water

MWS/mt

cc: Rita Votaw, Terminal Manager, BP Oil Company