



**Environmental  
Protection Agency**

Andrew J. Casper, Governor  
Leslie R. Fisher, Lt. Governor  
John P. Bland, Director

January 6, 2011

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.  
Ashtabula, Ohio 44004

Dear Ms. Funke:

On December 21, 2010, an inspection of the above referenced facility was conducted. The facility was represented by Ms. Rita Votaw, Terminal Manager and 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 hours per day 7 days per week. The wastewater is cycled through the two treatment units prior to being discharge through outfall 3IN00059001. Mr. Sheridan indicated that the vault is inspected twice daily.
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. On September 9, 2008, a conference call was made to you during the site visit 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. On October 29, 2009, an inspection from this office determined that construction of the building did not occur. A letter from you dated January 4, 2010, indicated that the installation of the building over the aeration vault was shelved as a result of significant improvement in the effluent quality. You indicated the facility has had very good results since some compromised piping underneath the additive dike area was repaired. It was believed that the compromised piping would allow various components of BTEX to infiltrate the piping leading to the oil/water separator during periods when the groundwater level is elevated.

Ms. Leanne Funke  
BP Products North America- Lorain Terminal  
January 6, 2011  
Page 2

5. Ms. Votaw indicated that with the improved effluent quality, the facility is in the process of collecting and evaluating the monthly effluent results to determine if additional treatment is deemed necessary.
6. Mr. Sheridan indicated that no EPA reportable spill at the loading rack area occurred in 2010.
7. Mr. Sheridan also indicated that the facility's catch basins are cleaned out once every two years.

This office has recently reviewed your self-monitoring reports covering the period November 1, 2009 through November 30, 2010 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

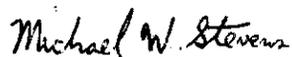
Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	34010	Toluene	1D Conc	20	210.	1/25/2010
001	34371	Ethylbenzene	1D Conc	20	58.	1/25/2010
001	34010	Toluene	1D Conc	20	27.	3/22/2010
001	34010	Toluene	1D Conc	20	46.	10/26/2010

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.

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

Respectfully,



Michael W. Stevens  
Environmental Engineer  
Division of Surface Water

MWS/mt

cc: Rita Votaw, Terminal Manager, BP Oil Company