



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

January 9, 2008

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

Dear Ms. Funke:

On December 11, 2007, 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 facility's general compliance with its NPDES permit.

During the inspection the following items were discussed:

1. "Quarterly (1/Quarter) sampling frequency" means the sampling shall be done in the months of March, June, August, and December, unless specifically identified otherwise in the Effluent Limitations and Monitoring Requirements table.
2. BP Products North America was issued an NOI March 15, 2006 for coverage under a petroleum corrective action.
3. BP took over ownership and operation of the carbon treatment system on June 1, 2007. The system was previously operated by Delta Environmental Consultants, Inc.
4. Part 1, A of the permit requires that various parameters be sampled 1/month or 1/quarter. **The question was asked, "What do you do for monthly and quarterly reporting if it only rains on the weekends and the facility is not staffed on the weekends?"** Monitoring is not required on days when the plant is not normally staffed (Saturdays, Sundays, and Holidays). If no discharge occurs during the entire month, report "AL" in the first column of the first day of the month on the DMR form. For quarterly sampling, it is Ohio EPA's intent to collect data four times per year. A sample should be collected and reported the following month along with a note in the remark section of the DMR indicating a sample was collected and reported late to meet the intent of the quarterly sampling requirement.
5. The discharge from outfall 3IN00059001 appeared to be having no visual impact on the roadside ditch.

This office has recently reviewed your self-monitoring reports covering the period January 1, 2007 thru October 31, 2007 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	53.	1/15/2007
001	34010	Toluene	1D Conc	20	30.	3/1/2007
001	34030	Benzene	1D Conc	20	31.	4/25/2007
001	34010	Toluene	1D Conc	20	120.	10/23/2007

Frequency Violations

Violation Date	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported
8/1/2007	001	34694	Phenol	1/Quarter	1	0
8/1/2007	001	34696	Naphthalene	1/Quarter	1	0

BP Products North America needs to continue to work toward compliance with its NPDES permit.

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 of what actions are going to be taken to reduce the limitation violations occurring at outfall 3IN0059001.

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/ams

cc: Rita Votaw, Terminal Manager, BP Oil Company