



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

December 12, 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 November 16, 2011, 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. Buckeye recently purchased the property from BP Products North America.
2. BP Products will continue to run the terminal until February 1, 2012.
3. Starting February 1, 2012, Buckeye Terminals, LLC – Lorain will take over operations of the bulk terminal.
4. The facility tied into the sanitary sewers in November 2011.
5. 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 seven days per week. The wastewater is cycled between the two treatment units prior to being discharge through outfall 3IN00059001.
6. Mr. Sheridan indicated that the vault is inspected twice daily.
7. Mr. Sheridan also indicated that the oil/water separator is stick tested monthly to determine the amount of oil captured in the system. This information is recorded and maintained in a log book.
8. The discharge from the treatment system was observed. No oil sheen or odor was noted.
9. The roadside discharge pipe from outfall 3IN00059001 was also observed. No oil sheen or other visual impact to the roadside ditch was noted.
10. Test America, Inc. is contracted to perform the analytical analysis of the effluent samples.
11. Mr. Sheridan grabs the samples and ships them over night.
12. The Ph reading is performed on site.
13. Benzene and toluene continue to have permit limit exceedances at outfall 3IN00059001.
14. The need for additional treatment at outfall 3IN00059001 has been discussed over the past several years. During the last inspection, Ms. Votaw indicated that as a result of the recently improved effluent quality, the need for additional treatment was going to be further evaluated. She indicated that the facility was in the process of collecting and evaluating the monthly effluent results to determine if additional

treatment is deemed necessary. The improved effluent quality is believed to be the result of some compromised piping underneath the additive dike area being replaced. 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 was elevated. **Based on the ongoing Limit violations cited below, it appears that additional treatment is needed to prevent the ongoing limit violations.**

15. Mr. Sheridan indicated that no EPA reportable spill at the loading rack area occurred in 2011 to date.
16. Mr. Sheridan confirmed that the facility's catch basins are still scheduled to be cleaned once every two years.

This office has recently reviewed your self-monitoring reports covering the period December 1, 2010 through October 31, 2011, 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	130.	12/12/2010
001	34030	Benzene	1D Conc	20	57.	12/12/2010
001	34010	Toluene	1D Conc	20	27.	4/18/2011

No frequency or code violations were noted.

Please notify this office in writing, within 21 days receipt of this letter, of your intentions concerning item 14. This letter should include dates either actual or proposed. A follow-up inspection will be conducted subsequent to the completion date.

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/cs

CC: Rita Votaw, Terminal Manager, BP Oil Company