



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Lucas County
BP Husky Refining LLC - Toledo Refinery
NPDES Permit
Compliance Evaluation Inspection

October 3, 2012

Mr. Mark Dangler, President
BP Husky Refining LLC - Toledo Refinery
P.O. Box 696
Toledo, Ohio 43697

Dear Mr. Dangler:

On September 10, 2012, a Compliance Evaluation Inspection (CEI) was conducted at the BP Husky Refining LLC - Toledo Refinery. Present for the inspection was Mr. James Nelson of your facility and Mr. Naajy Abdullah of the Ohio EPA, Northwest District Office, Division of Surface Water. The purpose of the inspection was to evaluate compliance with the terms and conditions of your National Pollutant Discharge Elimination System (NPDES) permit and to evaluate the operation and maintenance of the plant.

The wastewater treatment plant (WWTP) was undergoing a scheduled upgrade to portions of the influent channel to meet the QQQ regulations, and a bypass of the channel was underway. The remaining units of the WWTP were under normal operation. One of the sewer overflow impoundment tanks is down for maintenance and repair. It was indicated that this tank will be online by the end of the year.

It was indicated that the magmeter currently used at outfall 002 will be replaced by an ultrasonic meter. The discharge from the WWTP at outfall 601 and the combined flow at outfall 002 appeared normal.

If you have any questions or comments concerning the enclosed inspection report, please contact Mr. Naajy Abdullah at 419-373-3017 or by e-mail at Naajy.Abdullah@epa.state.oh.us.

Sincerely,

Elizabeth A. Wick, P.E.
Environmental Engineer/Section Manager
Division of Surface Water

NSA/jlm

Enclosure

ec: Tracking

NPDES Compliance Inspection Report

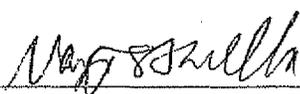
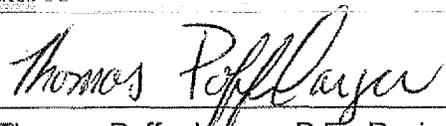
SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
2IG00007	OH0002461	CEI	S	2
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
9/10/2012	9:00 a.m.	11:00 a.m.	N	N

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
BP Husky Refining LLC - Toledo Refinery 4001 Cedar Point Road Oregon, Ohio 43616	9/1/2009
	Permit Expiration Date
	7/31/2014
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Mr. James Nelson, Senior Environmental Specialist	(419) 698-6339
Name and Title of Responsible Official	Phone Number
Mark Dangler, President	(419) 698-6244

SECTION C: AREAS EVALUATED DURING INSPECTION	
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated	
S	NPDES Compliance
S	Operations & Maintenance
S	Facility Site Review
S	Collection System
S	Flow Measurement
N	Receiving Waters
N	Laboratory

Comments:

- *Portions of oily waste influent channel bypassed for WWTP maintenance.
- *Construction of approved Eastside Collection Sewer progressing.

Signatures	
 9-26-12	 9/21/12
Naajy Abdullah, P.E., Inspector Compliance & Enforcement Division of Surface Water Northwest District Office	Thomas Poffenbarger, P.E., Reviewer Compliance & Enforcement Supervisor Division of Surface Water Northwest District Office

Compliance Data for BP Husky Refining LLC - Toledo Refinery between 9/1/2011 to 8/31/2012

Summary

Permit Effluent Limit Violations: 1
 Permit Effluent Code Violations: 0
 Permit Effluent Frequency Violations: 8
 Compliance Schedule Violations: 2

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
April 2012	601	pH	1D Conc	6.0	5.7	4/9/2012

Frequency Violations						
Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
September 2011	601	Total Suspended Solids	2/Week	2	1	9/1/2011
September 2011	601	Nitrogen, Ammonia (NH3	2/Week	2	1	9/1/2011
September 2011	601	Sulfide, Total	2/Week	2	1	9/1/2011
September 2011	601	Phenolic 4AAP, Total	2/Week	2	1	9/1/2011
September 2011	691	Total Suspended Solids	2/Week	2	1	9/1/2011
September 2011	691	Nitrogen, Ammonia (NH3	2/Week	2	1	9/1/2011
September 2011	691	Sulfide, Total	2/Week	2	1	9/1/2011
September 2011	691	Phenolic 4AAP, Total	2/Week	2	1	9/1/2011

Missing Compliance Schedule Milestones				
Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
September 2013		3099	Construction	Begin Construction
September 2013		3099	Construction	Begin Construction

SECTION D: PERMIT VERIFICATION

- Correct name and mailing address of permittee Y
- (a) Correct name and location of receiving waters Y
- (b) Products and production rates conform with permit application Y
- (c) Flows and loadings conform with NPDES permit Y
- (d) Treatment processes are as described in permit application Y
- (e) New treatment process added since last inspection N
- (f) Notification given to State of new, different or increased discharges Y
- (g) All discharges are permitted Y
- (h) Number and location of discharge points are as described in permit Y

Comments:

SECTION E: COMPLIANCE

- (a) Any significant violations since the last inspection N
- (b) Permittee is taking actions to resolve violations N/A
- (c) Permittee has a compliance schedule Y
- (d) Permittee is meeting compliance schedule Y

Comments:

SECTION F: OPERATION AND MAINTENANCE

- (a) Standby power available Y
If yes, what type? Dual Feed
- (b) Adequate alarm system available for power or equipment failures Y
- (c) All treatment units in service other than backup units Y
- (d) Wastewater Treatment Works classification III
- (e) Operator of Record holds unexpired license of class required by Permit.. N/A
Class held:
- (f) Copy of certificate of Operator of Record displayed on-site N/A
- (g) Minimum operator staffing requirements fulfilled N/A
- (h) Routine and preventative maintenance scheduled and performed Y
- (i) Any major equipment breakdown since last inspection N
- (j) Operation and maintenance manual provided and maintained Y
- (k) Any plant bypasses since last inspection N
- (l) Regulatory agency notified of bypasses N/A
By MOR and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic or organic overloads since last inspection N

Comments:

SECTION G: RECORD KEEPING

- a) Log book provided.....
- b) Format of log book (i.e. computer log, hard bound book)
- c) Log book(s) kept onsite in an area protected from weather
- d) Log book contains the following:
 - i) Identification of treatment works.....
 - ii) Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7
 - iii) Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs)
 - iv) Laboratory results (unless documented on bench sheets).....
 - v) Identification of person making log entries
- e) Has the Operator of Record submitted written notification to the permittee, Ohio EPA and any applicable local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred? ...

Comments: **This section is not applicable to this facility**

SECTION H: COLLECTION SYSTEM

- a) Percent combined system:.....
- b) Any collection system overflows since last inspection.....
CSO SSO
- c) Regulatory agency notified of overflows.....
- d) CSO O&M plan provided and implemented.
- e) CSOs monitored and reported in accordance with permit.....
- f) Portable pumps are used to relieve system
- g) Lift station alarms provided and maintained
- h) Lift stations equipped with permanent standby power or equivalent
- i) Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection.
- j) Any complaints received since last inspection of basement flooding
- k) Are any portions of the sewer system at or near capacity
- l) Are operations changed during high-flow events?

Comments: **This section is not applicable to this facility**

SECTION I: SLUDGE MANAGEMENT

- a) Sludge management plan (SMP) last audited by Ohio EPA:
Audit Date:
- b) Sludge adequately disposed
Method:
- c) If sludge is incinerated, where is ash disposed of
- d) Is sludge disposal contracted
Name:
- e) Has amount of sludge generated changed significantly
- f) Adequate sludge storage provided at plant.....
- g) Records kept in accordance with State and Federal law.....
- h) Any complaints received last year regarding sludge
- i) Is sludge adequately processed (digestion, pathogen control)

Comments: **This section is not applicable to this facility**

SECTION J: SELF-MONITORING PROGRAM

- a) Primary flow measuring device operated and maintained
Type of device: Mag meter Device location: Thermal effluent pumps
- b) Calibration frequency adequate Y
Date of last calibration:
- c) Secondary instruments operated and maintained Y
- d) Flow measurements equipment adequate to handle full range of flows Y
- e) Actual flow discharged is measured Y
- f) Flow measuring equipment inspection frequency Daily
- g) Sampling location(s) are as specified by permit Y
- h) Parameters and sampling frequency agree with permit Y
- i) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years
including all original strip chart recordings (i.e. continuous monitoring
instrumentation, calibration and maintenance records) Y

Comments:

SECTION K: Laboratory

- a) EPA applicable analytical testing procedures used (40 CFR 136.3) Y
- b) If alternate procedures are used, are they properly approved?..... N/A
- c) Analysis performed more frequency..... Y
 If yes, are results recorded in permittee's report? Y
- d) Commercial laboratory used: N
 Name:
 Parameters analyzed:
- e) Quality assurance manual provided and maintained..... N/A
- f) Calibration and maintenance of instruments is satisfactory?..... N/A
- g) Results of last U.S. EPA quality assurance..... N/A
 Date:

Comments:

SECTION L: EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall Number	Outfall sign in place	Oil Sheen	Grease	Turbidity	Foam	Solids	Color	Other
002	N/A	None	None	None	None	None	Typ	
601	N/A	None	None	None	None	None	Clear	
602	N/A	None	None	None	None	None	Typ	

Comments:

SECTION M: MULTIMEDIA OBSERVATIONS

- a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories N
- b) Do you notice staining or discoloration of soils, pavement or floors N
- c) Do you notice distressed (unhealthy, discolored, dead) vegetation N
- d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks N
- e) Do you notice any unusual odors or strong chemical smells..... N
- f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities N

If any of the above are observed, ask the following questions:

- 1) What is the cause of the condition?
- 2) Is the observed condition or source a waste product?
- 3) Where is the suspected contaminant normally disposed?
- 4) Is this disposal permitted?
- 5) How long has the condition existed and when did it begin?

Comments: