Misc 4

P-file Inspection

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

Northwest Regional Office
8315 Virginia Street, Suite 1
Merrillville, Indiana 46410-9201
(219) 757-0265
(888) 209-8892 Toll Free
(219) 757-0267 Fax
www.IN.gov/idem

September 23, 2004

VIA CERTIFIED MAIL 7002 0510 0004 0439 9013

Mr. Dennis J. Seith, Business Unit Leader
Whiting Business Unit
BP Products North America, Inc.
2815 Indianapolis Boulevard
Whiting, IN 46394-0710

Re: Inspection Summary/Violation Letter
Whiting Business Unit
BP Products North America, Inc.
NPDES Permit No. IN0000108
Whiting, Lake County

Dear Mr. Seith:

On June 2, 2004, a representative of the Indiana Department of Environmental Management, Northwest Regional Office, conducted the on-site portions of a Reconnaissance Inspection of BP Products North America, Inc., Whiting Business Unit, Whiting, Indiana. This inspection was conducted pursuant to NPDES Permit No. IN0000108 and IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Type of Inspection: _X_ Reconnaissance Inspection

Results of Inspection:
___ Violations were observed but corrected during the inspection.
_X_ Violations were observed.
___ Violations were observed and will be referred to the Office of Enforcement.

The following violations and concerns were noted during this inspection:

1. Receiving Waters Appearance – Receiving Waters Appearance was rated unsatisfactory because Lake Michigan, in the vicinity of outfall 001 was brown in color, attributable to the discharge from outfall 001. This is a violation of 327 IAC 2-1.5-8.

2. Effluent Appearance - Effluent Appearance was rated unsatisfactory because the final effluent at outfall 001 was turbid during the on-site portion of this inspection conducted on June 2, 2004, in violation of Part I. A. 1. b. and c. of the NPDES Permit.

3. Effluent Limit Violations – BP Products North America, Inc., Whiting Business Unit reported four (4) NPDES Permit numeric effluent limitation violations, of the limitations contained in Part I. A. 1 of the NPDES Permit, during 2002 and 2003. BP Products reported one such violation in 2002, and three (3) such violations in 2003. Each violation was for the parameter of TSS (see the enclosed Verification of Inspection and its attachments for more information regarding these violations).

Due to a problem with the certified operator tracking data base at IDEM, the certified operator for this facility, Mr. David Olen, was inadvertently cited as having his certification expired, at the time of the inspection. Enclosed is a revised verification of inspection report, which deletes the violations for Records and Reports and for Operations, because of the violation (certified operator expiration) being cited.

Within thirty (30) days of receipt of this letter, a written detailed explanation, documenting compliance with each of the requirements listed above, must be submitted to this office. Failure to respond adequately to this Violation Letter may result in a referral to IDEM's Office of Enforcement. Please direct any response to this letter and any questions to Michael Kuss at (219) 757-0265. Thank you for your attention to this matter.

Sincerely,

Rick Roudebush

Rick Roudebush, Inspections Section Chief
Compliance Branch
Office of Water Quality

Enclosure

cc: Richard Harris, Environmental Engineer
Rose Herrera, Environmental Engineer
David J. Olen, Wastewater Treatment Plant Supervisor
Linda J. Wilson, Superintendent, Environmental
Lake County Health Department

REVISED

NPDES FACILITY VERIFICATION OF INSPECTION

State Form 47989(R3/12-02)
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Revised 9/20/04 - RR

Facility and Inspection Information

NPDES Permit #: IN 0000108

Facility Type Code: ☐ 1 = Municipality ☒ 2 = Industry/Semi-Public ☐ 3 = Agricultural ☐ 4 = State/Federal
☒ Major ☐ Minor

This is to verify that on 6-2-04 (MM/DD/YY) an inspection of the specified facility was conducted by the undersigned representative of the Indiana Department of Environmental Management, Office of Water Quality.

TYPE OF INSPECTION:

- ___ Compliance Evaluation Inspection (C)
- X Reconnaissance Inspection (R)
- ___ Industrial User Inspection (I)
- ___ Sanitary Sewer Overflow (V)
- ___ Multimedia Screening Evaluation (M)
- ___ Combined Sewer Overflow Inspection (Y)
- ___ Compliance Sampling Inspection (S)
- ___ Other ___

Name and Location of Facility Inspected:	Receiving Waters/POTW:	Permit Expiration Date:
BP Products North America Inc. 2815 Indianapolis Blvd Town/City: Whiting, IN County: Lake Co. 46394-0710	Lake Michigan IHSC - Lake George Branch	2-28-95

Name(s) of On-Site Representatives:	Title(s):	
Richard Harris	Environmental Engr	Phone: (219) 473-3321
Rose Herrera	Environmental Engr	Fax: (219) 473-5379
David J. Olen	WWTP Supervisor	Phone: (219) 473-5298
Linda J. Wilson	Supt. Environmental	Fax: ( )

~~Certified~~ Operator:	Number:	Class:	
David J. Olen (Not certified) *	* 14118	* D (see comments 4 + 5 below)	☒ Full Time ☐ Part Time
	Renewal Effective Date: * None	Expiration Date: * 6-30-02	Hours per Week: 40 +

Name and Address of Responsible Official:	Title:	Phone:
Dennis J. Seith	Business Unit Leader	(219) 473-3179
	Contacted: ☐ Yes ☒ No	Fax: (219) 473-3504
		Facility Design Flow: 001 - 17MGD 002 120MGD

Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated, NA = Not Applicable)

U	Receiving Waters Appearance (1)	N	Facility/Site	N	Self-Monitoring Program	N	Compliance Schedules
U	Effluent Appearance (2)	U	Operation (5)	N	Flow Measurement	N	Pretreatment
N	Permit	N	Maintenance	N	Laboratory	S	Effluent Limits Violations 2004
NA	CSO/SSO (Sewer Overflow)	N	Sludge Disposal	U	Records/Reports (4) (3)	U	Other: Effl. Limit Vio. 2002+200

Preliminary Inspection/Screening Findings*

*These findings are considered preliminary and include specific matters discovered during the inspection that the designated agent of the department believes may be a violation of law or a permit issued by the department.

Single Media Inspection:

- ___ No violations were discovered with respect to the particular items observed during the inspection. (5)
- ___ Potential violations were discovered but corrected during the inspection. (4)
- X Potential violations were discovered and require a submittal and/or follow-up inspection. (2)
- ___ Potential violations were observed and may be referred to our Office of Enforcement. (1)
- X Additional information/review is required to evaluate overall compliance.
- ___ Other ___. (3)

Comments Regarding Marginal and Unsatisfactory Ratings – Including Rule or Permit Citation(s):

(1) The Lake George Branch of the IHSC had a visible oil sheen near outfall 004, but outfall 004 was clear with no visible sheen at the time of this inspection. The oil sheen observed on the IHSC is in violation of 327 IAC 2-1.5-8.

Lake Michigan was brown in color in the vacinity of outfall 001. The brown color was attributable to outfall 001, and is a violation of 327 IAC 2-1.5-8.

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REVISED Revised 9/20/04 RR

Additional Comments Regarding Marginal and Unsatisfactory Ratings – Including Rule or Permit Citation(s) :

(2) Outfall 001 was turbid and brown in color and contained fine settleable floc material, in violation of PART I-A.1. b and d of the NPDES permit.

(3) BP reported three (3) NPDES permit numeric effluent limitation violations in 2003 and one (1) in 2002. Each violation was for TSS at outfall 001 (2 daily maximum TSS violations in JAN 03 and the monthly average violation in JAN 03 and one daily max in NOV 02)

Conclusions and Recommendations:

NONE

Multi-Media Screening (please note that a multi-media screening is not a comprehensive evaluation of the compliance status of the facility):

X Multi-Media Screening not conducted.

_____ Potential problems or potential violations were discovered but corrected during the inspection.

_____ Potential problems or potential violations were discovered and will be referred to the Office(s) of _____ for further investigation and response.

Pollution Prevention

Pollution prevention is the preferred means of environmental protection in Indiana. The goal of pollution prevention is to promote changes in business and commercial operation, especially manufacturing processes, so that less environmental wastes are generated. Your participation in Indiana's pollution prevention program is entirely voluntary. Would your company like to be contacted by IDEM's Office of Pollution Prevention and Technical Assistance?

_____ Yes X No

If you have any pollution prevention questions, you may contact our Office of Pollution Prevention and Technical Assistance at (317) 233-5627 or toll-free (800) 988-7901 or visit their Web site at *http://www.in.gov/idem/oppta*.

Summary and Correction Information

A summary of violations and concerns noted during the inspection were verbally communicated to the undersigned representative during the inspection. The facility should correct any deficiencies noted as soon as possible. Corrections made and verified during the inspection may still be cited as violations.

_____ Written inspection summary will be provided within 45 days.

X Written report provided at the conclusion of the inspection. If upon subsequent review, any changes to this report are deemed necessary, a revised report will be sent to the subject facility within 45 days.

IDEM Representative:

Printed Name	Signature	Phone Number	Date	Time
Michael Kuss	[signature]	219 757-0265	6-2-04	In: 11:13A Out: 3:10P

Owner/Agent Representative/Title:

Printed Name	Signature	Title	Phone Number	Date
RICHARD HARRIS	[signature]	ENVIRONMENTAL ENGINEER	219 473-3321	6-2-04

For IDEM Internal Use:

Section Chief or Regional Deputy Director:	Date:	For:
9/13/04 Rick Rondelush	9/13/04	☐ Follow-up ☐ Enforcement ☐ NPDES Permits ☐ Other

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State Form 44229(R/4-97) MVSLP Revised 9/20/04 - RR

IDEM	NPDES Facility Inspection Report **Comments and/or Recommendations**	PAGE 3 OF 3

NPDES PERMIT #:	FACILITY:	CITY:	YR/MO/DAY:
IN0000108	BP North America	Whiting	04-06-02

in violation of the limitations contained in PART I. A.1 of the NPDES permit.

(4) ~~David J. Olen has been signing the DMRs and MROs, but according to IDEM he is not duly certified, for the failure to aquire the needed amount of continuing education credits, as required by 327 IAC 5-22. See footnote 1, below.~~

(5) ~~The wastewater treatment facilities are not under the direct supervision of an operator certified by the commissioner of the IDEM, in violation of PART II. A. 10, of the NPDES permit. See comment # 4 above and footnote 1, below.~~

Both above violations deleted - Rob Rondeau 9/20/04

Footnote 1: Attached all letters and records provided by BP. BP believes that David Olen has completed the necessary continuing education training and should be properly certified.

Inspected by:	Received by:	Date:
Michael Kuss	[signature]	6-2-04

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State Form 47989(R2/10-99)

MP/Rick File "P"

IDEM

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF WATER MANAGEMENT
NPDES Facility Inspection Report

100 NORTH SENATE AVENUE
P. O. BOX 6015
INDIANAPOLIS, IN 46206-6015

NPDES PERMIT #:	YR/MO/DAY:	INSPECTION TYPE:	INSPECTOR:	FACILITY TYPE CODE:
IN0000108	02-09-03	C	S	☐1 ☒2 ☐3 ☐4 ☒Major ☐Minor ☐Municipality ☒Industry ☐Semi-Pub ☐State/Federal

FACILITY INSPECTION RATING: (Based on inspection findings) 3

COMPLIANCE STATUS: (Based on inspection findings) ☒ Non-Compliance ☐ Compliance

11 37 AM '02

Name and Location of Facility Inspected:	Receiving Waters/POTW:	Permit Effective Date:
BP Products North America Inc 2815 Indianapolis Blvd Whiting, IN 46394 Town/City: County: Lake Co.	Lake Mich + IHSC Entry Time: Exit Time:	4-1-90 Permit Expiration Date: 2-28-95

Name(s) of On-Site Representatives:	Title(s):	Phone:
Rich Harris	Environmental Engineer	(219) 473-3321
Natalie Grimmer	Environmental Engineer	Fax: ( )
Steve Warzyniak	Optimization Engineer	Phone: ( )
		Fax: ( )

Certified Operator:	Number:	Class:	Exp:	☒ Full Time ☐ Part Time (Hours per week:_____)
David Olen	5404	D	6-30-04	

Name, Address of Responsible Official:	Title:	Phone:
Ashok K. Jhawar	Business Unit Leader	(219) 473-7700
		Fax: ( )
	Contacted: ☐ Yes ☒ No Unavailable	Facility Design Flow: 28 MGD

Areas Evaluated During Inspection
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Evaluated, N/A=Not Applicable)

1	M	Effluent Appearance	S	Facility Site Review	4	M	Flow Measurement	N	Pretreatment
2	M	Receiving Waters Appearance	3 M	Operation & Maintenance	9	S	Laboratory	6 S	Effluent Limits Violations
	N	Permit	N/A	CSO/SSO (Sewer Overflow)	5	M	Self-Monitoring Program	7	Other: Cogen Facility
	N	Compliance Schedules	S	Sludge Disposal		S	Records/Reports	8	Permit Renewal

COMMENTS: CSO Inspection _____ SSO Inspection _____ Multimedia Inspection _____ (Check if applicable)

This inspection was conducted on September 3, 4, and 5, 2002. Overall the facility does a good job of treating the wastewater generated at the facility. Scheduled preventative maintenance activities help to keep treatment facilities in good working order and help to produce quality effluent. There have been zero NPDES permit numeric effluent limitations in 2002, through July.

There are however a few issues that were noted during the inspection that deserve the attention of BP Products - Whiting refinery. They are:

① The final effluent from outfall 001 was discolored with a brown discoloration. Part I.A.1.d, page 3, of (continued)

Name(s) and Signature(s) of Inspector(s):	Date:	Office/Telephone:
Michael Kuss	9-5-02	IDEM (219) 881-6712
Received By:	**Date:**	**Referred to:**
Rich Harris/Natalie Grimmer	9-12-02 ~~9-5-02~~	
Section Chief/Regional Deputy Director:	**Date:**	**For:**
Rick Rowdebush	11/25/02	☐ Follow-up ☐ Enforcement ☐ NPDES ☐ Other

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State Form 44229(R/4-97)

IDEM	NPDES Facility Inspection Report **Comments and/or Recommendations**	PAGE 2 OF 5

NPDES PERMIT #:	FACILITY:	CITY:	YR/MO/DAY:
IN0000108	BP Products	Whiting	02-09-03

The NPDES permit NO. IN 0000108 addresses the issue of color in the effluent. This permit has a statement added to the standard language which states that color .... "apart from that normally produced by a properly functioning WWTP."

(2) There was a visible oil sheen observed on the IHSC, Lake George Branch. This oil sheen was not attributabal to current discharges from BP, as there was no discharge from outfall 004 at the time of this inspection.

(3) There was a significant deficiency noted with the final clarifier (#6001) at the sludge incineration facility. There was considerable sludge build-up in the clarifier to the extent that vegetation was growing on top of the accumulated sludge. Additionally, there was sludge build-up in the effluent discharge channel of the clarifier. The final effluent from this clarifier was slightly turbid. This effluent mixes with the treated effluent from the main WWTF, prior to discharge via outfall 001, at a ratio of approximately 40:1 (main WWTP flow : incinerator clarifier flow).

(4) The final effluent flow for outfall 001 is not being measured and monitored by a continuous meter as required by the NPDES permit. The flow is being calculated on a daily basis using the following formula:

Reported 001 Flow = AFU − [(FWR) + (CWR) + (BACKWASH) − (6001 TANK)]

AFU ≡ Air Flotation Unit; FWR ≡ Fire water recycle; CWR ≡ cooling water recycle; BACKWASH ≡ Sand Filtration Backwash water; 6001 TANK ≡ Incinerator clarifier wastewater Discharge.

Inspected by:	Received by:	Date:
Michael Kuss	Rick Harris/N. Grimmer	9-5-02

DISTRIBUTION: White - Public File; Canary - Site Copy; Pink - Inspector; Goldenrod - Supervisor

9-12-02

State Form 44229(R/4-97)

IDEM	NPDES Facility Inspection Report **Comments and/or Recommendations**	PAGE 3 OF 5

NPDES PERMIT #:	FACILITY:	CITY:	YR/MO/DAY:
IN0000108	BP Products - Whiting	Whiting	02-09-03

(5) The self monitoring program was rated marginal due to deficiencies noted with flow measurement.

(6) There have been no effluent numeric limitation violations in 2002, through July. There were two TSS exceedences reported in 2001. See the attached summary of NPDES permit limit violation forms for 2001 and 2002.

There was a release of Ammonia via outfall 002 and a reported oil sheen from outfall 002 in 2002. See the attached notification letters (addendums to the DMR submittals of JAN 2002 and MARCH 21, 2002).

(7) In 2001 a cogeneration steam and electrical facility was constructed at the Whiting refinery, designed to produce steam for BP Products and electricity for distribution. This facility is called Whiting Clean Energy. This was a joint venture between N. Source, Inc and at the time BP Amoco. This facility has the capability of discharging between 0.75 and 1.46 MGD of cooling tower blowdown and boiler blowdown wastewater, to the BP Products WWTF and ultimately through outfall 001, to Lake Michigan. Attached are copies of letters dated April 16, 2001 and April 30, 2001 which address this situation.

(8) On April 5, 2002 BP Products submitted an updated Application for renewal of NPDES permit No. IN0000108. A copy of the cover letter from this submittal is attached to this inspection report.

(9) The on-site representative for the lab portion of this inspection was Rick Solan. While the overall rating for the laboratory was satisfactory the following items were noted:

A) BP Products failed DMR QA study 21 for the parameter of selenium. See a copy of the results of DMR QA study 21. This test was conducted at microbac laboratory, Hammond, IN. Microbac evaluated their test procedures and found a problem with their testing equipment. See the attached corrective action letter dated February 4, 2002.

Inspected by:	Received by:	Date:
Michael Kuss	R. Harris / Natalie Gimmer 9-12-02	9-5-02

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State Form 44229(R/4-97)

IDEM	NPDES Facility Inspection Report **Comments and/or Recommendations**	PAGE 4 OF 5

NPDES PERMIT #:	FACILITY:	CITY:	YR/MO/DAY:
IN0000108	BP Products	Whiting	02-09-03

B) The Microbac Lab test results documentation should include the testing method reference source.

c) Microbac Lab should supply BP Products with QC/QA information on equipment calibration and Duplicate, Standard, and spike recovery analysis.

d) The thermometers used in BP Products sample Fridgerator should be changed to ~~me~~ Thermometer which are of more appropriate scale. The meters used currently range from -40°F to 300°F.

Inspected by:	Received by:	Date:
Michael Kuss	R. Harris / N. Grimmer 9-12-02	9-5-02

DISTRIBUTION: White - Public File; Canary - Site Copy; Pink - Inspector; Goldenrod - Supervisor

State Form 35969 (R3/10-97)

IDEM

NPDES Facility Inspection Report
Industrial Wastewater Facility

NPDES PERMIT #:	FACILITY:	CITY:	YR/MO/DAY:
IN 0000108	BP Products N. Amer. Inc	Whiting	02-09-03

FACILITY DESCRIPTION: Petroleum Refinery processing approximately 325,000 barrels per day of crude oil, with a maximum capacity of 410,000 barrels per day. July 2002

Outfall	Water Use	Treatment	Avg Discharge/Flow	Appearance/Violations
001	Process + stormwater	See Below	21.4 MGD	Slight Brown Color
002	Non-contact cooling	Oil Separator	94.2 MGD	Clear
003	stormwater	Oil water separator	No Discharge	No Discharge
004	stormwater	None	No Discharge	No Discharge

Process + stormwater	S	M	U	(S - Satisfactory M - Marginal U - Unsatisfactory)
TREATMENT SYSTEMS: Bar screen + grit	X			
API Separators	X			#12 Box flights being repaired. Plan to change out all flights
Flow equalization	X			
DAF	X			#5 DAF maintenance
Activated Sludge	X			New forced Aeration
Sand Filtration	X			All units in operation
Operations and maintenance	X			
O&M manual & maint records	X			
Preventative maintenance	X			Continuing Program for P.M.
Bypasses/Overflows		X		
Flow meter(s) and recorder(s)		X		No meter for outfall 001 002-Amubar
Meter calibration(s)	X			Calibrated quarterly
Sample type, frequency, location	X			
TTO monitoring				Not required
Biomonitoring (whole eff toxicity)				Not required
Toxic Reduction Evaluation Plan				Not required
Sludge handling	X			Sludge storage sludge thickener, Incineration
Sludge disposal	X			Incinerator wet scrubber ash PDC, Peoria IL
RCRA manifest records	X			See attached manifests Bar + grit sludge to Sonoma, CA.
Laboratory methods	X			Need to have method reference for Microbac Lab testing
Quality control		X		Need QC/QA information on Microbac Lab testing
Calibration of equipment	X			BP calibration satisfactory - Reg new Thermometers
Contract lab(s) used:	X			Microbac Labs, Hammond IND for some parameters
DMR, MRO and records	X			
SPCC plan	X			Updated 7-5-01
Housekeeping	X			
Self-monitoring program		X		Need Flow meter on Outfall 001
Incinerator (6001) clarifier			X	Heavy sludge build-up in clarifier

NPDES Compliance	NO - Need satisfactory flow measurement at outfall 001
Notice of Violation	
Agreed Order	
Compliance Schedule	
Properly certified operator	
Letter needed	

Inspected by:	Received by:	Date:
Michael Kuss	Rick Harris/Natalie Grimmer 9-12-02	9-5-02

DISTRIBUTION: White - Public File; Canary - Site Copy; Pink - Inspector; Goldenrod - Supervisor

2001 SUMMARY OF NPDES PERMIT LIMIT VIOLATIONS

FACILITY BP Products North America Inc. Whiting Refinery

NPDES PERMIT No. IN0000108

2001
LIST OF NPDES PERMIT LIMIT VIOLATIONS

MONTH	DATE(S)		TYPE	OUTFALL	PARAMETER	REPORTED VALUE	PERMIT LIMIT	PERCENT DEVIATION
JAN								
FEB								
MAR								
APR								
MAY								
JUNE	6-14		*	002	NH_3-N AMMONIA	27 lbs	N/A	
	*	This was a reportable incident from outfall 002 There are no Ammonia limitations for outfall 002						
JULY	7-25		DMx	001	TSS	6335 lb/d	5694 lb/d	
	7-26		DMx	001	TSS	10,095 lb/d	5694 lb/d	
AUG	NONE							
SEPT	NONE							
OCT	NONE							
NOV	NONE							
DEC	NONE							

2001 TOTAL NUMBER OF VIOLATIONS: 2*

* Plus the Reported Ammonia Discharge

DMx - Daily Maximum
DMn - Daily Minimum
MA - Monthly Average
WA - Weekly Average

Report Prepared by Michael Kuss Title Environmental Engineer

2002 SUMMARY OF NPDES PERMIT LIMIT VIOLATIONS

FACILITY BP Products North America, Inc - Whiting

NPDES PERMIT No. IN 0000108

2002 LIST OF NPDES PERMIT LIMIT VIOLATIONS

MONTH	DATE(S)	TYPE	OUTFALL	PARAMETER	REPORTED VALUE	PERMIT LIMIT	PERCENT DEVIATION
JAN	1-3	*	002	NH_3-N	6.7 lbs	*	
	* This was a reportable incident from outfall 002. There are no ammonia						
	limitations for outfall 002						
FEB	NONE						
MAR	3-2	*	002	Reported visible oil sheen	No numeric	limit violation	
APR	NONE						
MAY	NONE						
JUNE	NONE						
JULY	NONE						

2002 TOTAL NUMBER OF VIOLATIONS: 0

Through July 2002

2 reportable incidents

DMx - Daily Maximum MA - Monthly Average
DMn - Daily Minimum WA - Weekly Average

Report Prepared by Michael Kuss Title Environmental Engineer.

bp

ADDENDUM 1

Whiting Business Unit
2815 Indianapolis Blvd.
PO Box 710
Whiting, IN 46394-0710

OFFICE OF WATER MANAGEMENT
11 37 AM '02

CERTIFIED MAIL 7000 0520 0020 2643385
RETURN RECEIPT REQUESTED

March 21, 2002

Brian Smith
Office Of Emergency Response
Indiana Department Of Environmental Management
100 North Senate Avenue
Indianapolis, IN 46206-6015

Re: Release from Outfall 002 – March 2, 2002

Dear Mr. Smith

This letter is a follow-up to our initial notification about a release of approximately one quart of oil to Lake Michigan from Outfall 002 (the outfall for the once-through cooling water system) at the BP Products North America Inc. Whiting Refinery.

At approximately 6:30 pm on March 2, a sheen was observed on Lake Michigan adjacent to Outfall 002. Based on the size and color of the sheen, the volume of oil released was estimated to be one quart. The Whiting Refinery Emergency Response Team immediately responded to the incident and inspected the lake shore surrounding the Lakefront facility. No evidence of an oil release from Outfall 002 was detected. Vacuum trucks and absorbents were used to recover oil contained in the number 6 Separator (a set of boxes which provides for oil-water separation in the event of a leak prior to returning once-through cooling water to Lake Michigan via Outfall 002). A refinery wide unit inspection identified a potential source from the 11 PS area. The once-through cooling water (OTCW) line from this unit was blocked off and the oil coming into # 6 Separator cleared up by 7:30 pm. The following notifications were made on March 2, 2002.

6:40 pm -- National Spill Response Center (Incident # 595454)
6:50 PM – Whiting Filtration Plant
7:10 pm -- Indiana Department of Environmental Management (Incident #2002-30-017)
7:19 pm -- United States Coast Guard (Group Milwaukee)

After conducting a formal incident investigation, we have determined that oily water from the process sewer was back flowing into the once through cooling water OTCW return line after pressure was taken off of the OTCW system. This was only occurring during shut down periods at the 11 PS unit. Two underground valves were identified to have potential impact on the OTCW and when uncovered, they were found to be open. These valves have been removed and the lines capped. Hence the root cause of this incident has been addressed.

The MSDS for oil released (Decanted Oil/ INT-Light Cat Cracked Distillate) is attached.

Please contact Richard Harris 219-473-3321 if you have any questions or would like additional information.

Sincerely,

Karleen James
Environmental Superintendent
Health Safety and Environmental

Attachment

cc: Mike Kuss, IDEM, (fax) 317-308-3063

BP PRODUCTS NORTH AMERICA INC. – WHITING REFINERY

NPDES PERMIT NO. IN0000108

JANUARY 2002 DISCHARGE MONITORING REPORT

Addendum 1

In accordance with Section C. 5. of the refinery's NPDES permit, we are hereby reporting that the refinery released 6.7 lbs of ammonia (NH3) to Lake Michigan via Outfall 002 on January 3, 2002. The release occurred when one of the Claus Trains at the refinery's Sulfur Recovery Unit (SRU) tripped causing sour water to be flared. The incident also caused a simultaneous leak in a heat exchanger at the SRU causing sour water, containing ammonia, to leak into the once-through cooling water system. This resulted in the release of NH3 via Outfall 002. The duration of the release was for approximately 2 ½ hours on January 3, 2002 from about 0215 to 0445 hours.

As a means to prevent a reoccurrence, the refinery has implemented a Sour Water Flaring Critical Corrective Action (CCA) Program, which will immediately and automatically reduce sour water feed to the stripping towers in the event of an upset. Additionally, the refinery has committed to replace the existing aluminum bundle heat exchanger with titanium bundles by 2Q2002. Further details of this release were reported in a letter to Mr. Doral Hunt of the IDEM Emergency Response Section dated January 28, 2002.

April 16, 2001

Gary Prichard, Esq.
Office of Regional Counsel
U.S. Environmental Protection Agency
77 W. Jackson Boulevard
Chicago, Illinois 60604-3590

Re: Cogeneration Unit at BP Amoco Refinery in Whiting, Indiana

Dear Gary:

We want to thank you and the other EPA staff that met with us (either in person or by conference call) recently concerning the cogeneration unit at the BP Amoco refinery site in Whiting, Indiana. We understand that EPA needs additional information concerning that unit in order to make a determination as to the regulatory status of that project. Specifically, EPA has asked us to provide the following information:

1. Explain the ways in which the cogeneration unit has been constructed to meet BP Amoco's needs.

2. Explain how BP Amoco's operational decisions affect the operation of the cogeneration unit.

3. Explain how the extent to which the unit generates electricity is dependent on BP Amoco's demand for steam.

4. Describe any contractual provisions that support BP Amoco's operational control over the unit, including any provisions regarding input by BP Amoco into any decision by Whiting Clean Energy to sell the unit.

5. Explain that wastewater flows are expected to be within the scope of the flows that were reported in the 1989 permit application, and that the pollutants to be discharged will be similar to those in that application.

6. State an expectation that in the next permit for the refinery, limits would be applied to the cogeneration unit discharge, as appropriate BAT (Best Available Technology) Best Professional Judgment (BPJ) limits, that are consistent with the current New Source Performance Standards (NSPS) for steam electric units.

We are pleased to supply this information, to assist the Agency in resolving this matter. The requested information is provided below, organized in order of the six questions that EPA has raised, as they are presented above. You will note that since the EPA questions are somewhat related, some of the information provided in answer to one question is also relevant to other questions. Also, Questions 2 and 3 are so closely related that we have provided one response covering both questions.

1. Construction of Unit to Meet BP Amoco Steam Needs

The Whiting Clean Energy cogeneration unit was sited and configured at the BP Amoco refinery for the primary purpose of meeting BP Amoco's specifications for refinery steam supply and steam reliability. BP Amoco evaluated its need for steam, first to supplement its existing steam producing capability, and second to allow for the retirement of an old, less efficient boiler house. After detailed review of BP Amoco's refinery requirements, specifications were established for the pressure, temperature, flow rate and reliability of steam that must be supplied by the cogeneration unit. In the Energy Sales Agreement ("ESA"), the primary contract between BP Amoco and Whiting Clean Energy, BP Amoco requires that high pressure steam be available 100% of the time, in any quantity between 0 and 1,100,000 pounds per hour, and that 100% redundant equipment be immediately available to assure

reliability at critical, high use times. In addition, BP Amoco further requires that the cogeneration unit be capable of accepting delivery of up to 700,000 pounds per hour of high pressure steam from the refinery in periods when BP Amoco may have steam generating capability in excess of the refinery requirements. Finally, BP Amoco insisted upon a highly efficient production facility to assure low costs.

The efficiency requirement is best met through the use of combustion turbines (CT's) operating in a combined heat and power mode. The 1,100,000 pound per hour flow rate dictated the use of two 175 megawatt class CT's, each connected to a heat recovery steam generator ("HRSG"). The 100% redundancy requirement meant that each HRSG was outfitted with auxiliary burners that allowed direct firing of fuel in an operating HRSG, thus allowing for steam production in excess of what can be produced from the waste heat of the CT. (The auxiliary firing cannot occur unless the associated CT is in-service.) The variability in steam supply required that a steam turbine be supplied as part of the cogeneration unit to act as a "fly wheel" to absorb the potential fluctuations in the steam supply requirements. All of these factors relating to BP Amoco's steam needs helped determine the size and design of the cogeneration unit, including its potential power generation capacity of 525 megawatts.

2 & 3. BP Amoco Control over Operation of Cogeneration Unit

The control systems of the cogeneration unit and the refinery are interconnected, allowing BP Amoco to monitor the performance of the cogeneration unit and to send electronic signals to which the cogeneration unit's controls automatically respond. The first response to a change in steam demand from the refinery is to adjust the amount of steam delivered to the steam turbine. The change in steam flow to the steam turbine results in a corresponding adjustment in the amount of electricity produced by the steam turbine. The ESA requires that the cogeneration unit be operated to give priority to BP Amoco's refinery steam demand over any electric sales, with penalties due to ensure that delivery of steam to BP Amoco is always the top priority for the cogeneration unit.

Several "utility" services are provided to the cogeneration unit by the refinery. This includes items such as service water, fire protection water, treated boiler feedwater, sanitary sewers and wastewater treatment. All of these parameters have quantity and quality limitations on usage, and all can be curtailed by BP Amoco if the limitations are exceeded or, in an emergency situation, if operations within the refinery are threatened. Utility curtailments can limit the production level of the cogeneration unit and could even cause it to be shut down.

4. Contractual Provisions Providing BP Amoco with Operational Control over Unit

The ESA gives BP Amoco significant operational control over the cogeneration unit. In it, BP Amoco requires that at least one CT and associated equipment be in operation at all times. In addition, both CT's are required to be in operation approximately five (5) months of the year, as directed by BP Amoco, to accommodate its steam requirements and maintenance schedule. These constraints will result in some base amount of electricity being produced at all times, irrespective of electric market conditions.

BP Amoco has approval rights concerning the scheduling of planned maintenance outages of the cogeneration unit, and has specified certain maintenance criteria to be utilized. It is involved in cogeneration unit safety and environmental compliance, and has general operational oversight for all aspects of the cogeneration unit. BP Amoco has the right to approve any change of the operations contractor utilized by Whiting Clean Energy. If certain reliability measures are not realized, BP Amoco can require Whiting Clean Energy to undertake corrective measures. Such measures are subject to BP Amoco's approval. Also, with the exception of certain limited circumstances related to financing of the project, no assignment of the ESA or sale of Whiting Clean Energy can be made without BP Amoco's prior approval. This effectively gives BP Amoco approval over any sale of the cogeneration unit.

5. Nature of Wastewater Flows and Pollutants as Within Scope of Permit Application

The cogeneration unit will produce two wastewater streams, which will be commingled and then discharged to the BP Amoco refinery's wastewater treatment plant. These streams are cooling tower blowdown and

boiler blowdown, at a total combined flow ranging from 0.75 to 1.46 million gallons/day (MGD). As explained below, this additional wastewater flow and quality are within the scope of BP Amoco's 1989 NPDES Permit Renewal Application (1989 PRA).

Statistical evaluations of the wastewater treatment plant's reported flows and the addition of the cogeneration unit's wastewater flows have been performed, which show that the addition of the cogeneration flows is well within the scope of the flows reported in the 1989 PRA. Form 2C of the 1989 PRA reported the wastewater treatment plant's long-term average, maximum monthly average and maximum daily flows to be 15.0 MGD, 17.5 MGD, and 24.7 MGD respectively. The standard deviation for the long-term average wastewater treatment plant flow would be 4.93 MGD. The additional cogeneration maximum daily flow of 1.46 MGD is well below this standard deviation. This means that the normal variability in flow around the long-term average is great enough, due to existing factors, that the impact of adding even the cogeneration unit's maximum daily flow would likely be unnoticeable.

In an additional analysis, the impact of adding cogeneration flows to refinery flows was investigated. Differences were calculated based on long-term average flows and maximum monthly average flows. The percent difference in total wastewater treatment plant flows when cogeneration flows are added is less than 8.5 percent in all cases. As a way to determine whether an 8.5 percent difference in flow is significant, this value was compared to flow-measurement variability. Based on accepted procedures, at a 95% confidence level an acceptable variability was calculated to be 9.8 percent. Therefore, the combined cogeneration and historic wastewater treatment plant flows are within the acceptable variability for the wastewater treatment plant flow. This means that at a 95 percent confidence level it would be difficult to measure the difference in flow due to the cogeneration contribution.

Regarding the nature of the pollutants in the cogeneration unit discharge, the quality of the cogeneration blowdown streams will be similar to wastewater streams identified in the 1989 PRA. Cooling tower and boiler blowdown streams were listed in the 1989 PRA. The cogeneration cooling tower and boilers will utilize pH controls, biocides, dispersant, and corrosion inhibitors that have been or are currently used by BP Amoco in operating the refinery's existing cooling towers and boilers. The additional cogeneration wastewater will, therefore, not cause the discharge of new or different pollutants. The cogeneration wastewater can be treated by the BP Amoco refinery's wastewater treatment plant, since it is similar to the cooling tower and boiler wastewater generated by the power units currently operating at the refinery. The resulting wastewater treatment plant discharge will meet existing permit limits.

6. Expectations as to Limits in Next Permit for Refinery

As you know, BP Amoco has applied for a renewed NPDES permit for the refinery, and is awaiting issuance of that permit by the State. It is understood that in the process of issuing that permit, the discharge from the cogeneration unit will be evaluated, and that appropriate Best Available Technology (BAT) limitations will be imposed, based on the State's Best Professional Judgment (BPJ). It is expected that these limitations would be consistent with the current New Source Performance Standards (NSPS) for steam-electric generating units. In addition, we should note that the permit renewal process will include extensive opportunities for public involvement as to the appropriate conditions to be included in that permit.

We trust that this information adequately responds to the questions that EPA has raised concerning the proposed cogeneration unit, and that a written response from the Agency on the unit's regulatory status will be issued soon. Please feel free to call if you have any questions, or if you need any additional information.

Sincerely,

Arthur E. Smith, Jr.

Senior Vice President &
Environmental Counsel

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF
WN-16J

APR 30 2001

Mr. Arthur E. Smith, Jr.
Senior Vice President & Environmental Counsel
NiSource, Inc.
801 E. 86th Avenue
Merrillville, IN 46410

Mr. Stanley W. Sorrels
Manager, HSE Division
BP Amoco
2815 Indianapolis Boulevard
Whiting, IN 46394

Re: Cogeneration Unit at BP Amoco Refinery in Whiting, Indiana

Dear Messrs. Smith and Sorrels:

Thank you for your letter of April 16, 2001, regarding the cogeneration unit at the BP Amoco Refinery in Whiting, Indiana. In your letter, and in previous correspondence and meetings, you explained that the cogeneration unit at the refinery site was designed for the primary purpose of meeting BP Amoco's specifications for refinery steam supply and steam reliability. You also explained how BP Amoco's need for steam supply and reliability controls, to a large extent, the manner in which the cogeneration unit will be operated. Finally, you explained that BP Amoco has approval rights concerning the scheduling of planned maintenance outages of the cogeneration unit, general operational oversight for all aspects of the cogeneration unit, the right to approve any change of the operations contractor utilized at the cogeneration unit, the right to require Whiting Clean Energy to undertake corrective measures, and the ability as a practical matter to prevent the sale of the cogeneration unit without BP Amoco approval. In short, you have demonstrated that BP Amoco will effectively be the "operator" of the cogeneration unit.

You also previously provided us BP Amoco's 1989 permit application for the oil refinery site. Boilers, power stations, and cooling towers are among the unit processes described in that application; and non-contact cooling water taken from Lake Michigan for the cooling towers is one of the wastestreams identified in the permit application. You also have explained that operation of the cogeneration unit will not cause the volumes and pollutants in discharges from BP Amoco to increase above levels contemplated by the 1989 permit application.

This new information addresses the concerns that we raised in our letter of June 27, 2000. Specifically, the fact that BP Amoco will effectively be the "operator" of the coogeneration unit means that the New Source Performance Standards (NSPS) at 40 CFR Part 423 do not apply here since BP Amoco is not "primarily engaged in the generation of electricity and sale."

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 50% Recycled Paper (20% Postconsumer)

The fact that the cogeneration unit will be operated by an "operator" identified in the 1989 permit application (*i.e.*, BP Amoco) also addresses the concerns we raised in our letter of January 10, 2001. We, therefore, now believe that the discharges at issue here will be within the scope of the operations identified in BP Amoco's 1989 permit application. Because BP Amoco timely complied with the notification requirements of its permit regarding its proposed changes to its facility, those discharges will be authorized by BP Amoco's 1990 permit.

Notwithstanding our conclusion, we urge you to provide the Indiana Department of Environmental Management (IDEM) with an updated permit application to reflect the cogeneration unit, and to work with IDEM to ensure permit reissuance, as soon as possible. In that regard, we note the statement in your April 16, 2001, letter that you expect that your next permit will include technology-based effluent limitations based upon Best Professional Judgement that will be consistent with the current NSPS for steam-electric generating units at 40 CFR Part 423.

Sincerely,

for Rebecca Harvey, Chief
NPDES Program Branch

cc: Matthew C. Rueff, IDEM

bp

Ashok K. Jhawar
Business Unit Leader
Whiting Business Unit

BP
2815 Indianapolis Boulevard
Whiting, IN 46394
USA

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

April 5, 2002

Mr. Steve Roush
Supervisor, Permits Section
Indiana Department of Environmental Management
Office of Water Quality
100 North Senate Street – P.O. Box 6015
Indianapolis, IN 46206-6015

Dear Mr. Roush:

Re: Updated Application for Renewal of NPDES Permit No. IN0000108

Direct 219 473 3179
Fax 219 473 3504
Cell 219 320 0344
jhawarak@bp.com

Enclosed are three copies of the updated application to renew existing NPDES permit number IN0000108 for BP Products North America Inc. – Whiting Refinery. Also enclosed is a check for $50 to cover the application fee. The attached Executive Summary describes the contents of the updated application.

With this submittal, which includes "Volume I Updated" and "Revision and Update to Volume IIR", we consider the permit application complete. As you know, installation of a new effluent diffuser is an important aspect of implementing the permit renewal proposal. The estimated time for the final design, construction, and installation of the effluent diffuser, including obtaining a permit from the US CORE of Engineers, is approximately three years. Work will start once we receive an agreement from IDEM to implement a mixing zone for Outfall 001.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Please contact Natalie R. Grimmer at 219-473-5417 regarding this updated permit renewal application.

Sincerely,

Ashok K. Jhawar

Ashok K. Jhawar
Whiting Business Unit Leader

Enclosures

Discharge Monitoring Report - Quality Assurance - 2001

EPA NPDES / IDEM

Provider Environmental Resource Associates

Rec'd 5/29/01

Parameter	Date	Tech	Whiting Value	Overall Range	Assigned Value	Acceptance Limit	Evaluation	Method Reference
MINERALS								
total solids @ 105 C								
total dissolved solids @ 180 C								
conductivity @ 25 C								
alkalinity as CaCO3								
chloride								
fluoride								
sulfate								
potassium								
sodium								
pH	8/3/2001	J. O'Mara	8.32	**4 - 9.5 s.u.**	8.36	8.12 - 8.60	Acceptable	SM 4500-H+ B
HARDNESS								
total suspended solids	8/21/2001	J. O'Mara	61.1	**23 - 100 mg/L**	62.5	47.8 - 67.3	Acceptable	SM 2540 D
calcium								
magnesium								
calcium hardness as CaCO3								
total hardness as CaCO3								
GREASE & OIL								
grease & oil (gravimetric)	na	R. Bertalan	na	**8 - 50 mg/L**				SM 5520 B
grease & oil (infrared)	8/8/2001	R. Bertalan	49.0	**8 - 50 mg/L**	46.9	31.5 - 52.9	Acceptable	SM 5520 C
TRACE METALS								
aluminum								
antimony								
arsenic								
barium								
beryllium								
boron								
cadmium								
chromium	8/23/2001	J. O'Mara	209	**17- 1000 ug/L**	186	160 - 212	Check for Error	SM 3111 B
cobalt								
copper								
iron								
lead								
manganese								
mercury								
molybdenum								
nickel								
selenium	8/27/2001	Microbac	318	**90 - 2000 ug/L**	251	196-292	**Not Acceptable**	SM 3113 B
silver								
stroniu,								
thallium								
vanadium								
zinc								
DEMAND								
BOD	8/24/2001	J. O'Mara	68.1	**15 - 250 mg/L**	60.7	30.5 - 90.8	Acceptable	SM 5210 B
CBOD								
COD	8/24/2001	J. O'Mara	95.2	**15 - 250 mg/L**	97.9	72.5 - 115	Acceptable	SM 5220 D
TOC	8/24/2001	J. O'Mara	38.1	**6 - 100 mg/L**	38.7	32.3 - 44.7	Acceptable	SM 5310 B
total phosphorus as P								
TKN as N								
NUTRIENTS								
ammonia as N	8/21/2001	J. O'Mara	11.4	**0.25 - 19 mg/L**	11.0	8.53 - 13.4	Acceptable	SM 4500-NH3 F
NO3 + NO2 as N								
ortho-PO4 as P	8/21/2001	J. O'Mara	4.07	**0.05 - 5.5 mg/L**	3.89	3.32 - 4.49	Acceptable	SM 4500-P D
CYANIDE & PHENOL								
cyanide, total								
Phenol	8/22/2001	J. O'Mara	0.138	**0.04 - 5 mg/L**	0.119	0.0576 - 0.181	Acceptable	SM 5530 D
RESIDUAL CHLORINE								
total residual chlorine	8/27/2001	Microbac	1.39	**0.15 - 5.0 mg/L**	1.36	1.03 - 1.59	Acceptable	SM 4500-CL-I

NOTE:

1 BP AMOCO OIL WHITING IN NPDES Permit Number **IN0000108**

BP AMOCO OIL WATLS LAB EPA Labcode **IN01066** — Provider is ERA

Microbac Laboratories, Inc EPA Labcode **IN00063** — Provider is APG

February 4, 2002

OFFICE OF WATER MANAGEMENT
NOV 22 11:08 AM '02

NPDES Permit # IN0000108

Indiana DEM / OWM
Oper. Assist. & Training Section
100 N. Senate Avenue
PO Box 6015
Indianapolis, IN 46206-6015

Attn: Barbara D. McDowell
(317) 233-6464 phone
(317) 232-8637 fax
bmcdowel@dem.state.in.us

DMRQA 21 Study – Corrective Action

The DMRQA 21 Proficiency Study results for permittee number IN0000108 were acceptable, except for the selenium result. (A copy of all results is enclosed as DMRQA21.xls). Selenium is performed for our permit by Microbac Laboratories, Inc (Labcode IN00063). Accordingly, the corrective action process was undertaken by their lab and their report is attached.

To evaluate if their corrective action was effective, we gave Microbac two ERA standards to test for selenium. The results before indicate their actions were effective:

Standard	Run Value	Assigned Value	Acceptance Limits
ERA Lot # P075-500	864	933	741 – 1080 ug/l
ERA Lot # P077-500	211	231	180 - 269 ug/l

If you have any questions, please don't hesitate to contact me.

Respectfully submitted,

Ralph Moore
Whiting Laboratory Supervisor
(219) 473-3878 phone
(219) 473-3467 fax
moorerr@bp.com

enc
Natalie Grimmer, Environmental Engineer, Water / Waste Issues and Permitting
Kay Posegate, Laboratory Manager

STATE OF ILLINOIS
P.O. BOX 19276 SPRINGFIELD, ILLINOIS 62794-9276 (217) 782-6761
FOR SHIPMENT OF HAZARDOUS AND SPECIAL WASTE
State Form LPC 62 8/81 IL532-0610
PLEASE TYPE (Form designed for use on elite (12-pitch) typewriter.) EPA Form 8700-22 (Rev. 6-89) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: IND000810861
Manifest Document No.: 99453
2. Page 1 of 1
Information in the shaded areas is not required by Federal law, but is required by Illinois law.

3. Generator's Name and Mailing Address / Location If Different
BP Products North America Inc. - N.E. of 119th & Front St.
Lakefront - 2815 Indpls. Blvd. Whiting, IN 46394
Whiting, IN 46394 (Return to: MANIFEST, MC-122)

4. *24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS* (219) 473-3361**

A. Illinois Manifest Document Number: IL 9654658 FEE PAID IF APPLICABLE
B. Generator's IL ID Number: 9 1 8 0 8 9 0 0 2 1
C. Transporter's ID Number: UPM-0762748-IL
D. Transporter's Phone (219) 473-2956
E. Transporter's ID Number:
F. Transporter's Phone ( )
G. Facility's IL ID Number: 1 4 3 8 1 2 0 0 0 3
H. Facility's Phone (309) 676-4893

5. Transporter 1 Company Name: Chemical Disposal Services, Inc.
6. US EPA ID Number: ILR000066662
7. Transporter 2 Company Name:
8. US EPA ID Number:
9. Designated Facility Name and Site Address: Peoria Disposal Company, 4349 Southport Road, Peoria, IL 61615
10. US EPA ID Number: ILD000805812

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, Hazardous Waste, Solid, N.O.S., 9, NA3077, III (F037,F038,K048,K049,K050,K051,D010)	0 0 1	D T	0 0 0 1 8	Y	EPA HW Number *F 0 3 7 / 0 0 0 3 9 0
b.					EPA HW Number
c.					EPA HW Number
d.					EPA HW Number

J. Additional Description for Materials Listed Above
Ia. Profile #15049; Incinerator Wet Scrubber Solids
*F037,F038,K048,K049,K050,K051,D010
Permit No. 932361-15049
#1221 Trailer

K. Handling Codes for Wastes Listed Above In Item #14: Y

15. Special Handling Instructions and Additional Information
**24-hour emergency response telephone number: (219) 473-3361 (Gate 36); ask to contact "on-call environmental support." See attached NA emergency response guide #171.

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR,** if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: WILLIAM SNYDER
Signature: [signature]
Date: Month Day Year: 08 28 02

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Charles Gray
Signature: [signature]
Date: Month Day Year: 08 28 02

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Date: Month Day Year:

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.
Printed/Typed Name:
Signature:
Date: Month Day Year:

GENERATOR / TRANSPORTER / FACILITY

Cert #7000-0520-0020-6164-4603 sent to IEPA 7/3/02

This Agency is authorized to require, pursuant to Illinois Revised Statute, 1989, Chapter 111 1/2, Section 1004 and 1021, that this information be submitted to the Agency. Failure to provide this information may result in a civil penalty against the owner or operator not to exceed $25,000 per day of violation. Falsification of this information may result in a fine up to $50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

Peoria Disposal Company

Land Disposal Restriction Notification & Certification Form

Generator Name: BP Products North America Inc. - Lakefront WMDS#: 15049

EPA Hazardous Waste #(s): F037, F038, K048, K049, K050, K051, D010 Manifest #: IL9654658

This waste is a: (check one): __ Wastewater
X Nonwastewater

Management Codes:

Each Waste # listed below will be identified with a reference code representing the appropriate method of management. The Management Codes and corresponding certification statements, if applicable, are as follows:

A **Restricted Waste Requires Treatment:**
This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268, Subpart D, 268.32 or RCRA Section 3004(d).

B **Restricted Waste Can Be Land Disposed Without Further Treatment:**
I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268, Subpart D. I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

C **Restricted Waste Treated to Performance Standards:**
I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards specified in 40 CFR Part 268 without impermissible dilution of the prohibited waste. I am aware there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

D **Waste Which Is Subject to an Exemption from the Land Disposal Restrictions such as, but not limited to a Case-by-Case Extension under 268.5, an Exemption under 268.6, or a National Capacity Variance under Sub-Part C of 40 CFR Part 268:** I certify that this waste is not prohibited from land disposal.

Date the waste is subject to the prohibition: _____

E **This hazardous debris is subject to the alternative treatment standards of 40 CFR 268.45.**

Hazardous Waste #	Subcategory, if applicable	Management Code(s)
F037		B
F038		B
K048		B
K049		B
K050		B
K051		B
D010		B

Date of characterization analysis: 7/30/99 (attach most recent copy with the first load)

I hereby certify that all information submitted in this and all associated documents is complete and accurate to the best of my knowledge.

Signature: Steve Warzyniak Title: Engineer

Name: STEVE WARZYNIAK Date: 8-1-02

ldrnotif.doc

BP Products North America Inc.
Whiting Business Unit

EMERGENCY RESPONSE GUIDE 171

RQ, Hazardous Waste Solid N.O.S., 9 NA 3077, PGIII (F037, F038, K048, K049, K050, K051)

(Continued from page 1)

SPILL OR LEAK

- Do not touch or walk through spilled material.
- Stop leak if you can do it without risk.
- Prevent dust cloud.
- Avoid inhalation of asbestos dust.

Small Dry Spills

- With clean shovel place material into clean, dry container and cover loosely; move containers from spill area.

Small Spills

- Take up with sand or other noncombustible absorbent material and place into containers for later disposal.

Large Spills

- Dike far ahead of liquid spill for later disposal.
- Cover powder spill with plastic sheet or tarp to minimize spreading.
- Prevent entry into waterways, sewers, basements or confined areas.

FIRST AID

- Move victim to fresh air.
- Call emergency medical care.
- Apply artificial respiration if victim is not breathing.
- Administer oxygen if breathing is difficult.
- Remove and isolate contaminated clothing and shoes.
- In case of contact with substance, immediately flush skin or eyes with running water for at least 20 minutes.
- Ensure that medical personnel are aware of the material(s) involved, and take precautions to protect themselves.

OFFICE OF SOLID AND HAZARDOUS WASTE MANAGEMENT
P.O. Box 7035
Indianapolis, IN 46207-7035

PLEASE PRINT OR TYPE (Form designed for use on elite (12-pitch typewriter.) Form approved. OMB No. 2050-0039. Expires 9-30-95

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA No.: IND000810861 | Manifest Document No.: 99121 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law, but items D, F, H, I and K are required by State law.

3. Generator's Name and Mailing Address
BP Products North America Inc. - Lakefront
2815 Indianapolis Blvd.
Whiting, IN 46394 (Return to: MANIFEST, MC-122)

A. State Manifest Document Number: INA 1202399

B. State Generator's ID: IND000810861

4. Generator's Phone: (219) 473-3321

5. Transporter 1 Company Name: Safety-Kleen Ltd.

6. US EPA ID Number: MIT270019904

C. State Transporter's ID: MIT270019904

D. Transporter's Phone: (519) 864-1201

7. Transporter 2 Company Name:

8. US EPA ID Number:

E. State Transporter's ID:

F. Transporter's Phone:

9. Designated Facility Name and Site Address
Safety-Kleen Ltd.
RR #1, 4090 Telfer Road
Corunna, ON NON 1GO

10. US EPA ID Number: MIR000035204

G. State Facility's ID: MIR000035204

H. Facility's Phone: (519) 864-1021

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol.	I. Waste No.
a RQ, Waste Environmentally Hazardous Substances Solid, NOS (F037, F038), 9, UN3077, PGIII	001	CM	15,796	P	F037
b					
c					
d					

J. Additional Descriptions for Materials Listed Above
11 a. S-K Waste Code "A"
Additional Codes: F038

K. Handling Codes for Wastes Listed Above
D80

15. Special Handling Instructions and Additional Information
Driver sign at point of departure, Port Huron, MI. 24-hr. emergency contact (219) 473-3361, on-call emergency person ERG #171 - attached. GQ 08-15-02
WW 05618-9

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.
And conforms to the terms of the attached EPA acknowledgement of consent.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Michael G. Lankford | Signature: Michael G. Lankford | Date: Month 08 Day 14 Year 02

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Gary Quinn | Signature: Gary Quinn | Date: Month 08 Day 14 Year 02

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: | Signature: | Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted item 19.
Printed/Typed Name: DAVE OLDALE | Signature: [signature] | Date: Month 08 Day 15 Year 02

GENERATOR / TRANSPORTER / FACILITY

INA 1202399

In case of a spill call the Indiana Office of Environmental Response at 317/241-4336 (day or night) and the National Response Center at 800/424-8802 or 202/426-2675.

EPA Form 8700-22
Previous editions are obsolete
State Form 11865 (R2 / 1-94)

COPY 4 TSD MAIL TO GENERATOR

safety-kleen.

LDR NOTIFICATION FORM

Generator Name BP Products North America, Inc.-Lakefront Manifest No. ENA 1202399

Pursuant to 40 CFR §268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR Part 268 Land Disposal Restrictions (LDR).

A. GENERAL WASTE NOTIFICATION

Form Line No.	SK Profile No.	EPA Waste Codes & LDR Subcategories (if any) *List codes or use Attachment 1*	NWW	WW	Waste Constituent Notification *Check the "None" box or List Legend Constituent # or use Attachment 2*
1	A	F037, F038 ☐ Check if Attachment 1 has been used	☒	☐	☐ None ☐ Check if Attachment 2 has been used
2		☐ Check if Attachment 1 has been used	☐	☐	☐ None ☐ Check if Attachment 2 has been used
3		☐ Check if Attachment 1 has been used	☐	☐	☐ None ☐ Check if Attachment 2 has been used
4		☐ Check if Attachment 1 has been used	☐	☐	☐ None ☐ Check if Attachment 2 has been used
5		☐ Check if Attachment 1 has been used	☐	☐	☐ None ☐ Check if Attachment 2 has been used
6		☐ Check if Attachment 1 has been used	☐	☐	☐ None ☐ Check if Attachment 2 has been used

B. HAZARDOUS DEBRIS NOTIFICATION

☐ This hazardous debris, as identified above on Line No(s). _____ is subject to the alternative treatment standards of 40 CFR §268.45.

The waste contains the following contaminants subject to treatment (check all that apply):

☐ Toxicity characteristic debris ☐ Debris contaminated with listed waste ☐ Cyanide reactive debris

C. CONTAMINATED SOIL NOTIFICATION & CERTIFICATION

☐ This contaminated soil, as identified above on Line No(s). _____ is subject to the alternative treatment standards of 40 CFR §268.49(c).

Complete the following: "I certify under penalty of law that I personally have examined this contaminated soil & it [☐does/ ☐does not] contain listed hazardous waste & [☐does / ☐does not] exhibit a characteristic of hazardous waste & [☐is subject to / ☐complies with] soil treatment standards as provided by §268.49(c) or the universal treatment standards". *Note: Constituents subject to treatment are any constituents listed in 40 CFR §268.48 Universal Treatment Standards that are reasonably expected to be present in any given volume of contaminated soil, except fluoride, selenium, sulfides, vanadium & zinc, & are present at concentrations greater than ten times the universal treatment standard.*

D. LAB PACK (INCINERATION) NOTIFICATION & CERTIFICATION

☐ This lab pack, as identified above on Line No(s). _____ is subject to the alternative treatment standards of 40 CFR §268.42(c).

"I certify under penalty of law that I personally have examined & am familiar with the waste & that the lab pack contains only wastes that have not been excluded under Appendix IV to 40 CFR Part 268 & that this lab pack will be sent to a combustion facility in compliance with the alternative treatment standards for lab packs at 40 CFR §268.42(c). I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment".

E. EXTENSIONS & VARIANCES

☐ This waste, as identified above on Line No(s). _____ is not prohibited from land disposal & is subject to a deadline extension or variance, e.g., treatability variance, case-by-case extension. *Describe below any extension or variance that applies to this waste & include applicable dates*

Michael G Lankford	Michael G Lankford, Environmental Specialist	08/14/2002
Generator's Authorized Signature	Name & Title (Printed or Typed)	Date

DWALKER.LDR.NOTIFICATION 11.22.98