



## Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

**Eric J. Holcomb**  
Governor

**Bruno Pigott**  
Commissioner

March 25, 2021

Via Email to: donnie.brown@bp.com  
Mr. Donnie Brown, Vice President of Refining  
BP Products North America Inc. - Whiting Refinery  
2815 Indianapolis Boulevard  
Whiting, Indiana 46394

Dear Mr. Brown:

Re: Inspection Summary Letter  
BP Products North America  
NPDES Permit No. IN0000108  
Whiting, Lake County

An inspection of the above-referenced facility or location was conducted by a representative of the Indiana Department of Environmental Management, Northwest Regional Office, pursuant to IC 13-18-3-9. A summary of the inspection is provided below:

Date(s) of Inspection: March 17, 2021  
Type of Inspection: Compliance Evaluation Inspection  
Inspection Results: Potential problems were discovered or observed.

1. The Laboratory category was rated as marginal. At the time of the inspection it was determined that the lowest standard utilized in calibrating the Ammonia-N meter was 0.5 mg/L. Many of the analytical effluent results for Ammonia-N are < 0.1 mg/L. The expected results should be bracketed by the standards used. Therefore, the lowest Ammonia-N standard utilized should be 0.1 mg/L for calibration purposes.

A copy of the NPDES Industrial Facility Inspection Report is enclosed for your records. Please direct any response to this letter and any questions to Nicholas Ream at 219-730-1691 or by email to nream@idem.IN.gov.

Sincerely,

Rick Massoels, Deputy Director  
Northwest Regional Office

Enclosure



# NPDES Industrial Facility Inspection Report

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number: <b>IN0000108</b>	Facility Type: Industrial Major	Facility Classification: D	TEMPO AI ID 11589																				
Date(s) of Inspection: March 17, 2021																							
Type of Inspection: Compliance Evaluation Inspection																							
Name and Location of Facility Inspected: <b>BP Products North America</b> 2815 Indianapolis Boulevard Whiting IN 46394		Receiving Waters/POTW: Lake Michigan and the Indiana Harbor Ship Canal	Permit Expiration Date: 3/31/2024 Design Flow: NA																				
On Site Representative(s): <table style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 15%;">First Name</th> <th style="width: 15%;">Last Name</th> <th style="width: 25%;">Title</th> <th style="width: 25%;">Email</th> <th style="width: 20%;">Phone</th> </tr> <tr> <td>David</td> <td>Moye</td> <td>Operator</td> <td>david.moye@bp.com</td> <td></td> </tr> <tr> <td>Ted</td> <td>Papadopoulos</td> <td>Environmental Specialist</td> <td>theodore.papadopoulos@bp.com</td> <td>219-370-8167</td> </tr> <tr> <td>Timothy</td> <td>Carroll</td> <td>Environmental Team Lead</td> <td>timothy.carroll@bp.com</td> <td>219-370-3345</td> </tr> </table>				First Name	Last Name	Title	Email	Phone	David	Moye	Operator	david.moye@bp.com		Ted	Papadopoulos	Environmental Specialist	theodore.papadopoulos@bp.com	219-370-8167	Timothy	Carroll	Environmental Team Lead	timothy.carroll@bp.com	219-370-3345
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Was a verbal summary of the inspection given to the on-site rep? <b>Yes</b>																							
Certified Operator: David Moye	Number: 21204	Class: D	Effective Date: 5/15/19	Expiration Date: 6-30-21	Email: david.moye@bp.com																		
Cyber Security Contact																							
Name: _____			Email: _____																				
Responsible Official: Mr. Donnie Brown, Vice President of Refining 2815 Indianapolis Boulevard Whiting, Indiana 46394			Permittee: BP Products North America Inc. - Whiting Refin Email: donnie.brown@bp.com Phone: _____ Fax: _____																				
			Contacted? No																				
<b>INSPECTION FINDINGS</b>																							
<input type="radio"/> Conditions evaluated were found to be satisfactory at the time of the inspection. (5) <input type="radio"/> Violations were discovered but corrected during the inspection. (4) <input checked="" type="radio"/> Potential problems were discovered or observed. (3) <input type="radio"/> Violations were discovered and require a submittal from you and/or a follow-up inspection by IDEM. (2) <input type="radio"/> Violations were discovered and may subject you to an appropriate enforcement response. (1)																							
<b>AREAS EVALUATED DURING INSPECTION</b>																							
<i>(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)</i>																							
S	Receiving Waters	S	Facility/Site	S	Self-Monitoring	N	Compliance Schedules																
S	Effluent/Discharge	S	Operation	S	Flow Measurement																		
S	Permit	S	Maintenance	M	Laboratory	S	Effluent Limits Compliance																
		S	Sludge	S	Records/Reports	N	Other:																
<b>DETAILED AREA EVALUATIONS</b>																							
<b>Receiving Waters:</b>																							
S 1. The receiving stream was visibly free of excessive deposits of settled solids, floating debris, oil, scum, or billowy foam.																							
Comments: The receiving streams at Outfalls 002, 003, and 004 were free of notable foam, algae or solids.																							
<b>Effluent/Discharge:</b>																							
S 1. Final effluent was essentially free of excessive solids, floating debris, oil, scum, or billowy foam.																							
N 2. Pretreatment discharge into sanitary sewers appeared free of excessive oils, grease, solids, or foam and did not appear to be in violation of the local Sewer Use Ordinance.																							
N 3. Pretreatment discharge into sanitary sewers did not contain materials that pass through or interfere with the																							

operation of the POTW.

**Evaluation of Multiple Outfalls:**

Outfall #	Insp. Date	Outfall Inspection Comments
002	3/17/2021	The effluent was clear and free of color at the time of the inspection.
003	3/17/2021	The effluent was clear and free of color at the time of the inspection
004	3/17/2021	No discharge was occurring at the time of the inspection. The water surrounding the discharge structure within the discharge pond was clear.
005	3/17/2021	The effluent for Outfall 005 discharges offshore into Lake Michigan. The effluent was observed at the discharge box, immediately prior to being pumped into Lake Michigan.

Comments:

The effluents at Outfalls 002, 003, and 005 were clear and free of color at the time of the inspection.

**Permit:**

- S 1. Did the facility have a copy of the current permit available for reference.
- N 2. If the permit expires within 180 days, has a renewal application been submitted?
- S 3. Receiving waters are accurately described in the permit.
- N 4. The permit has been properly transferred if there is a new owner.

Comments:

The facility has a valid permit.

**Facility/Site:**

- N 1. The facility was found to have standby power or equivalent provision, If required.
- S 2. An adequate alarm or notification system for power or equipment failure was available for the treatment facility.
- S 3. Safe and adequate access was provided for inspection of all treatment units and outfalls.
- S 4. Facilities and equipment did not appear beyond their useful life.
- 5. List any safety concerns noted during the inspection in the box below:

Comments:

The facility grounds are well maintained.

**Operation:**

- S 1. All facilities and systems necessary for achieving compliance with the terms and conditions of the permit were operated efficiently, including an anticipated bypass report for steps of treatment taken out of service.
- S 2. An adequate, qualified operating staff was found to be provided to carry out the operation of the facility, including:
  - a. Certified Operator's on-site attendance and/or qualified operations personnel attendance was adequate.
  - b. Adequate documentation of operational activities, including system monitoring and cleaning.
  - c. Adequate funding to ensure proper operation.
- S 3. Solids handling procedures were adequate.
- S 4. Documentation of solids removal, handling, and disposal was adequate.

Comments:

All units of treatment appeared to be operating efficiently.

**Maintenance:**

- S 1. A maintenance record system has been established and includes maintenance/repair history and preventative maintenance plan.
- S 2. Facility maintenance activities appeared adequate.

Comments:

Facility maintenance activities appeared adequate.

**Sludge:**

- S 1. Sludges, screenings, and slurries were found to be handled and disposed of properly.

Comments:

A records review during the inspection, specifically for March 14 and March 16, 2021, showed adequate handling and disposal of sludge. The records reviewed indicated non-hazardous waste sludge is taken to the Newton County Landfill for disposal. Records also indicate hazardous waste sludge is removed by Heritage.

**Self-Monitoring:**

- S 1. Samples were found to be taken at pre-designated locations and were found to be representative.
- N 2. Flow-proportioned samples were found to be obtained where needed.
- S 3. The facility was found to conduct sampling of all waste streams, including type and frequency, as required in the permit.
- 4. Sample collection procedures, including automatic sampling, include:

- S a. Samples refrigerated during compositing.
- b. Proper preservation techniques used.
- c. Containers and holding times conform to 40 CFR 136.3.

- S 5. Sample documentation was adequate and includes:
  - a. Dates, times, and locations of sampling.
  - b. Name of individual performing sampling.
  - c. Instantaneous flow for flow-weighted aliquots.
  - d. Chain of Custody records.

N 6. NPDES Permit Total Toxic Organic (TTO) requirements were being met.

N 7. NPDES Permit Whole Effluent Toxicity (WET) testing requirements were being met.

Comments:

The Self Monitoring Program was rated as satisfactory. All sampling practices are conducted accurately and at the frequency required by the permit.

**Flow Measurement:**

S 1. Flow was found to be properly monitored as required by the permit.

S 2. Flow data and calibration records were available for review, and document that monitoring equipment has been calibrated at the frequency required in the permit.

Comments:

The facility's flow measurement program, including all documentation, is adequate and representative.

**Laboratory:**

The following laboratory records were reviewed:

Sample Log	TSS Bench Sheets	pH Bench Sheets
Ammonia Bench Sheets	Nitrogen QA/QC	Chlorine Bench Sheets

- N 1. The laboratory practices and protocol reviewed were adequate, including:
  - a. A written laboratory QA/QC manual was available.
  - b. Samples were found to be properly stored.
  - c. Approved analytical methods were used.
  - d. Calibration and maintenance of instruments was adequate.
  - e. QA/QC procedures were adequate.
  - f. Dates of analyses (and times, where required) were recorded.
  - g. Name of person performing analyses was recorded.

M 2. Review of lab records and/or on-site field testing equipment and protocols was found to be adequate.

Comments:

The Laboratory category was rated as marginal. At the time of the inspection it was determined that the lowest standard utilized in calibrating the Ammonia-N meter was 0.5 mg/L. Many of the analytical effluent results for Ammonia-N are < 0.1 mg/L. The expected results should be bracketed by the standards used. Therefore, the lowest Ammonia-N standard utilized should be 0.1 mg/L for calibration purposes.

**Records/Reports:**

The following records/reports were reviewed:

DMRs for the period of January 2020 to January 2021 were reviewed as part of the inspection.

S 1. All facility records for the period including the previous three years were available for review.

S 2. DMRs and MMRs were completed properly and accurately including:

- a. "No Ex" column was accurate.
- b. Signatory requirements were met.
- c. Reports were prepared by or under the direction of a certified operator.

S 3. Bypass and Noncompliance reporting are adequate.

Comments:

The requested records were available and appeared complete and accurate.

**Compliance Schedules:**

N 1. The NPDES Permit Schedule of Compliance monitoring and reporting milestones have been met.

N 2. Agreed Order compliance milestones have been met.

Comments:

The permittee has three years from the start of the permit, i.e. until April 1, 2022, to meet the new 316(b) BTA standard for impingement mortality, as listed in the NPDES permit's Fact Sheet, Part 6.2 and Part 6.3.2. As of

the date of this inspection, no schedule of compliance milestones have come due.

**Effluent Limits Compliance:**

Yes 1. Were DMRs reviewed as part of the inspection?

DMRs for the period of January 2020 to January 2021 were reviewed as part of the inspection.

No 2. Were violations noted during the review of DMRs?

Comments:

**IDEM REPRESENTATIVE**

Inspector Name:

Nicholas Ream

Email:

nream@idem.IN.gov

Phone Number:

219-730-1691

**IDEM MANAGER REVIEW**

IDEM Manager:

Rick Massoels

Date:

3/22/2021