



Indiana Department of Environmental Management

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Eric J. Holcomb
Governor

Brian Rockensuess
Commissioner

March 01, 2024

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 Product North America, Inc.
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, Southeast Regional Office, pursuant to IC 13-18-3-9. A summary of the inspection is provided below:

Date(s) of Inspection:	February 27, 2024
Type of Inspection:	Reconnaissance Inspection
Inspection Results:	Conditions evaluated were found to be satisfactory at the time of the inspection.

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,

Mark A. Amick, Director
Southeast Regional Office

Enclosure



NPDES Industrial Facility Inspection Report

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number: IN0000108		Facility Type: Industrial		Facility Classification: Major		Facility Classification: D		TEMPO AI ID 11589			
Date(s) of Inspection:		February 27, 2024									
Type of Inspection:		Reconnaissance Inspection									
Name and Location of Facility Inspected: BP Product North America, Inc. 2815 Indianapolis Boulevard Whiting IN 46394					County: Lake			Receiving Waters/POTW: Indiana Harbor Shipping Canal and Lake Michigan		Permit Expiration Date: 3/31/2024	
								Design Flow: NA			
On Site Representative(s):											
First Name		Last Name		Title		Email		Phone			
Llewellyn		Reed		Environmental, Social, Carbon Superintendent		llewellyn.reed@bp.com					
Matt		Sorrells		Sr. Environmental Advisor		matthew.sorrells@bp.com					
David		Moye		Engineer		david.moye2@bp.com					
Mike		Piekarz		Superintendent of Utilities and Lakefront							
Was a verbal summary of the inspection given to the on-site rep? Yes											
Certified Operator: David Moye		Number: 21024	Class: D	Effective Date: 7-1-21	Expiration Date: 6-30-24	Email: david.moye2@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 Refi					
						Email: donnie.brown@bp.com					
						Phone:				Contacted?	
						Fax:				No	
INSPECTION FINDINGS											
<input checked="" 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 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)											
AREAS EVALUATED DURING INSPECTION											
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)											
S	Receiving Waters	S	Facility/Site	N	Self-Monitoring	N	Enforcement				
S	Effluent/Discharge	S	Operation	N	Flow Measurement						
S	Permit	N	Maintenance	N	Laboratory	N	Effluent Limits Compliance				
		N	Sludge	N	Records/Reports	N	Other:				
DETAILED AREA EVALUATIONS											
This inspection was conducted with a focus on wastewater treatment operations subsequent to the loss of power at the BP Refinery that initially occurred on February 1, 2024.											
Receiving Waters:											
Comments:											
The receiving stream, as observed at Outfall 002, was free of notable foam, algae or solids. The Outfall 005 discharge within Lake Michigan is not readily observable from shore due to its distance; therefore, it was not											

evaluated during this inspection.

Effluent/Discharge:

Comments:

The effluent for Outfalls 002 and 005 were clear and free of color at the time of the inspection.

Permit:

Comments:

The facility has a valid permit.

Facility/Site:

Comments:

The facility grounds are well maintained. All areas requested to be inspected were made available.

Operation:

Comments:

All units of treatment appeared to be operating efficiently at the time of the inspection.

On February 1, 2024, the BP refinery suffered power interruptions across the facility, including at the Lakefront Wastewater Treatment Plant. The certified operator and Superintendent of Utilities and Lakefront explained that the wastewater plant was without power for approximately 1.5 hours. During that time, the discharge pumps ceased to function and discharges from the wastewater treatment plant ceased. Data from the main pump operations did not exist due to the power loss, but the four individual pumps, which discharge to the main effluent pumps, were still on and indicated no discharge was occurring for approximately two hours after the power loss.

Emergency diesel pumps were installed shortly after power was returned to the wastewater treatment plant in case of future power fluctuations. Two diesel pumps are still located on-site at the wastewater treatment plant. Facility personnel are reviewing the incident to determine what, if any, future upgrades to the electrical system are appropriate.

Facility personnel were requested to increase sampling frequencies to daily for all parameters, excluding Whole Effluent Toxicity, in an email from Kim Rohr with IDEM, dated February 2, 2024 (see attached document). BP personnel stated they were unable to collect all the samples requested due to the short time allowed, the weekend, and the fact that BP laboratory personnel were not allowed back to the facility until Sunday, February 4, 2024. Some samples, particularly those that could be preserved, were sampled and analyzed over the weekend.

On February 7, 2024, BP personnel requested to cease daily sampling at Outfalls 003 and 004, as they are not associated with the refinery wastewater treatment facility, and have no treatment. The request was granted on the same day.

A review of the partial data, prior to having Quality Assurance/Quality Control checks, made available to IDEM from February 1 to February 9, 2024, did not indicate effluent exceedances or operational problems were occurring. Daily sampling was still occurring as of the time of the inspection.

Effluent Limits Compliance:

No 1. Were DMRs reviewed as part of the inspection?

Comments:

IDEM REPRESENTATIVE

Inspector Name:

Nicholas Ream

Email:

nream@idem.IN.gov

Phone Number:

219-730-1691

Other staff participating in the inspection:

Name(s)

Miya Spratt

Ramelito Biscocho

Phone Number(s)

219-312-1226

219-252-3566

IDEM MANAGER REVIEW

IDEM Manager:

Mark A. Amick

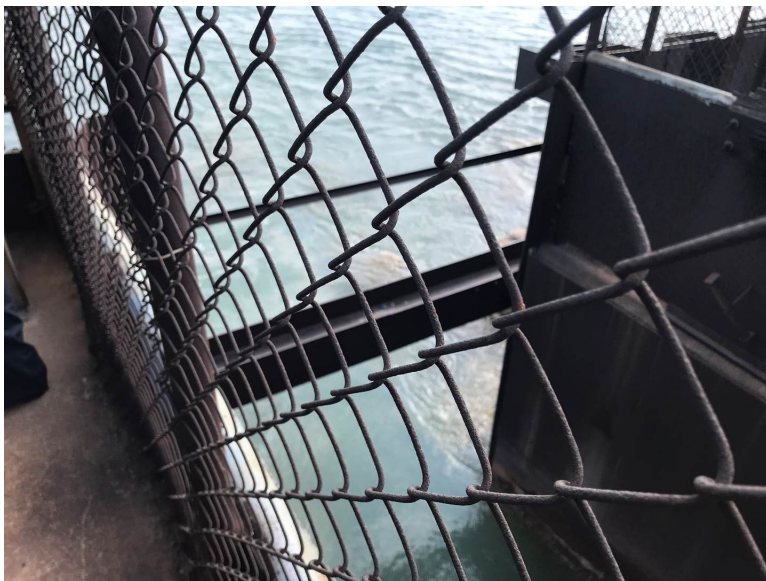
Date:

2/29/2024

Inspection Photographs



Facility: BP Product North America, Inc.	
Photographer: Nicholas Ream	
Date: 02/27/2024	Time: 1:00 PM
Others Present: Llewellyn Reed, Mike Piekarz, Matt Sorrells, Dave Moye, Ramelito Biscocho, Miya Spratt	
Location/Description: View of water samples for February 27, 2024. J-92 indicates water coming to the wastewater plant. The DNF is Dissolved Nitrogen Floatation and occurs prior to aeration tanks, clarification, and filters.	



Facility: BP Product North America, Inc.	
Photographer: Nicholas Ream	
Date: 02/27/2024	Time: 1:00 PM
Others Present: Llewellyn Reed, Mike Piekarz, Matt Sorrells, Dave Moye, Ramelito Biscocho, Miya Spratt	
Location/Description: East view of Outfall 002 to Lake Michigan.	



Facility: BP Product North America, Inc.	
Photographer: Nicholas Ream	
Date: 02/27/2024	Time: 1:05 PM
Others Present: Llewellyn Reed, Mike Piekarz, Matt Sorrells, Dave Moye, Ramelito Biscocho, Miya Spratt	
Location/Description: Down and north view of water prior to discharge to Outfall 005.	

From: [Rohr, Kimberly L](#)
To: [matthew.sorrells@bp.com](#); [david.moye@bp.com](#); [Llewellyn.reed@bp.com](#); [donnie.brown@bp.com](#); [michael.piekarz@bp.com](#); [billy.mayer@bp.com](#)
Cc: [HOUSE, JASON](#); [Lugar, Robert G](#); [Ream, Nicholas](#); [Spratt, Miya C](#); [Greinke, David](#); [McShane, Myra](#)
Subject: IN0000108 BP Products North America, Emergency Incident
Date: Friday, February 2, 2024 12:35:59 PM
Attachments: [image001.png](#)
[image002.png](#)

Dear BP Products North America,

IDEM appreciates the communication you have provided thus far through the county inspector, Nick Ream, regarding the power outage incident BP has experienced. The purpose of this communication is to request that BP do the following, in response to the recent emergency incident at the BP facility:

1. For all outfalls, immediately, and until further notice, increase the monitoring frequency of all permit parameters to daily, 7 days a week, with the exception of Whole Effluent Toxicity Testing, using approved analytical methods. Report the results to IDEM, via e-mail to krohr@idem.in.gov, nream@idem.in.gov, mcspratt@idem.in.gov and as soon as results become available.
2. For all outfalls and treatment systems, immediately, and until further notice, conduct a daily visual assessment and provide findings to IDEM, via e-mail to krohr@idem.in.gov as soon as findings become available.
3. As there are public water intakes in the area, provide IDEM any information concerning issues of any discharge that could impact public water intakes, immediately, via the Emergency Response spill line, 317-233-7745, as well as via email to krohr@idem.in.gov.

Please note that compliance with the request contained in this letter does not alleviate any compliance requirements already contained within NPDES Permit No. IN0000108.

Please direct any questions and responses to Kim Rohr, Wastewater Inspections Section Chief, at KRohr@idem.IN.gov or 317-605-6489.



Kim Rohr
Section Chief
Wastewater Inspections
Office of Water Quality
Office: 317-234-2558
Cell: 317-605-6489
krohr@idem.in.gov

Indiana Department of Environmental Management
100 N. Senate Avenue, Indianapolis, IN 46204
<https://www.in.gov/idem/cleanwater/2337.htm>

