



State of Ohio Environmental Protection Agency

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Northwest District Office

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WASTE MGT.

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Bob Taft, Governor
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November 14, 2003

Certified Mail 7003 0500 0001 8452 2214

Mr. Joseph Sontchi
BP Products North America
Premcor Refining Group, Inc.
1150 South Metcalf Street
Lima, Ohio 45804

**Re: Hazardous Waste Permit Modification
Class 1A Approval
BP Products North America
Premcor Refining Group, Inc.
BP Chemicals Inc.
U.S. EPA ID# OHD 005051826/ Ohio Permit # 03-02-0390**

Dear Mr. Sontchi:

On September 18, 2003, Ohio EPA received a request for a Class 1A (Class 1 requiring prior approval) hazardous waste permit modification (tracking number - 030918-1A-1) from BP Products North America, Premcor Refining Group, Inc. and BP Chemicals Inc. With this letter, Ohio EPA approves the above referenced Class 1A modification submitted pursuant to Ohio Administrative Code Rule 3745-50-51.

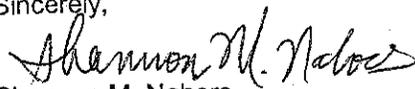
FOR APPROVAL

The following modification has been made to your June 20, 2003, Ohio Hazardous Waste Facility Installation and Operation Permit. Also, the records of Ohio EPA have been changed accordingly:

The permit has been modified, according to Condition F.12, to add the revised Post-Closure Ground-Water Detection Monitoring Plan for the Primary Pond Waste Consolidation Area.

Enclosed is a copy of the permit revisions. This has been included to ensure that all involved parties have written confirmation of the change(s)*. If you have any questions concerning this action, please contact Don North at the Ohio EPA Northwest District Office.

Sincerely,


Shannon M. Nabors
Assistant Chief

*Also, in accordance with Ohio Administrative Code Rule 3745-50-51(D)(1)(a)(ii), BP Products North America, Premcor Refining Group, Inc. and BP Chemicals Inc. shall send a notice within 90 days of an approved Class 1A Modification to all persons on the Agency mailing list. An updated mailing list can be obtained by contacting Pamela Allen at (614) 644-2980, or by e-mail at pamela.allen@epa.state.oh.us.

/cs Enclosure
pc: Pamela Allen, Manager, ITTSS, DHWM, CO (w/ attach.)
Jeremy Carroll, Supervisor, Engineering Unit, DHWM, CO
Don North, DHWM, NWDO (w/ attach.)
Eric Getz, Supervisor, DHWM, NWDO
Ali Moazed, DHWM, NWDO
Gary Deutschman, DHWM, NWDO (w/ attach.)
Cindy Lohrbach, DHWM, NWDO (w/ attach.)
DHWM, NWDO File (w/attach.)

MODULE F - GROUND WATER DETECTION MONITORING

F.1. Module Highlights

This module addresses the ground water monitoring program associated with the Primary Pond Waste Consolidation Area (PPWCA) at the Lima Refinery. The PPWCA is being monitored as a landfill with post-closure care under the PPWCA Post-Closure Ground-Water Detection Monitoring Plan (PCGWDMP) which was approved by Ohio EPA on May 1, 2002.

The Permittee's ground water monitoring system consists of three (3) monitoring wells and one piezometer which are screened in the Middle Sand. The Middle Sand is comprised primarily of sand and gravel, fine sand and considerable amounts of clay and thin lenses of silt and sand with considerable clay. The composition is typical of a unit deposited by a braided stream flowing before a glacial front and is Wisconsinan in age. The monitoring wells consist of one background well: FW-03S(a), two downgradient wells: FW-13S and FW-18S, and one piezometer, FW-15S.

F.2. Well Location, Installation and Construction OAC Rule 3745-54-97

The Permittee shall install and maintain a ground water monitoring system as specified below:

- a) The Permittee shall maintain, as part of a Ground Water Detection Monitoring System complying with OAC Rule 3745-54-97(A) and (B), the ground water monitoring wells on the map in Figure 4 2 of this module the Post-Closure Ground-Water Detection Monitoring Plan (PCGWDMP) and in conformance with the following list.

Unit	Background Wells	Point of Compliance Wells
Primary Pond Waste Consolidation Area	FW-03S(a)	FW-13S FW-18S

The ground water monitoring system must: yield samples in upgradient wells that represent the quality of the background ground water unaffected by leakage from any regulated unit(s), and in downgradient wells yield samples that represent the quality of water passing the point of compliance. The number and location of monitoring wells must be sufficient to identify and

define all logical release pathways to the uppermost aquifer from the regulated units based on site-specific hydrogeologic characterization.

- b) The Permittee shall maintain the monitoring wells identified in Permit Condition F.2(a), in accordance with the detailed plans and specifications presented in the document entitled: "Post-Closure Ground-Water Detection Monitoring Plan for the Primary Pond Waste Consolidation Area, Lima, Ohio Refinery, BP Oil Company", Eagon & Associates, Inc., ~~May 1, 2002~~, September 10, 2003, Revision 1, which shall also be known as the PCGWDMMP throughout the remainder of this permit. The PCGWDMMP is hereby incorporated into the approved permit application.
- c) The Permittee shall remove or replace any monitoring well identified in Permit Condition F.2(a) in accordance with the Appendix to OAC Rule 3745-50-51 permit modification process. Each change must be accompanied by a revised map as specified on Figure 4 2 of the PCGWDMMP for Permit Condition F.2(a).
- d) All wells removed or replaced in accordance with Permit Condition F.2(c) shall be plugged and abandoned in accordance with the document entitled "State of Ohio Technical Guidance for Sealing Unused Wells" (State Coordinating Committee on Ground Water, 1996).
- e) Whenever any of the wells specified in Permit Condition F.2(a) are replaced, the Permittee must demonstrate to Ohio EPA that the ground water quality at the replacement well meets the criteria in Permit Condition F.2(a) within a two year period of the date of replacement using means appropriate to the reason for replacement.

F.3. Indicator Parameters and Monitoring Constituents
OAC Rule 3745-54-98

- a) The Permittee shall monitor all wells listed in Permit Condition F.2(a) for the following parameters and constituents:

application for a permit modification to make any appropriate changes to the program which will satisfy the regulations.

F.12. Compliance Schedule

The Permittee shall, within 90 days of permit journalization, submit an amended PCGWDMP to meet the revisions required by this permit. The submittal of the revised PCGWDMP constitutes a Class 1 permit modification for which the Director's approval is required. The Permittee shall address the following:
[The Permittee submitted the amended PCGWDMP, dated September 10, 2003, on September 25, 2003. The amended version addresses each of the items listed below.]

F.2.c) - "... Each change must be accompanied by a revised map as specified on Figure 4 2 of the PCGWDMP for Permit Condition F.2(a)." This is not stated in the PCGWDMP.

F.3.b)iii) - "If an intra-well statistical method is to be used, then the Permittee shall collect at least eight data points from each well (background and compliance point wells)." The PCGWDMP does not explicitly designate at which monitoring wells the samples will be collected.

F.3.c) - "Background data collected in accordance with Permit Condition F.3(b) and OAC Rule 3745-54-97(G), for the establishment of background concentrations developed in accordance with OAC Rule 3745-54-97(H) and (I), may be updated in accordance with the following requirements:..." The Permittee stated that the topic of updating the background database would not be discussed in the PCGWDMP and that if the need arose to update the background database, then the Permittee would supply language of it's own.

F.6. Statistical Procedures - "When evaluating the monitoring results in accordance with Permit Condition F.7., the Permittee shall use the following procedures to identify statistically significant evidence of contamination:..." The company has referenced the rules. This section of the permit is almost identical to the rules except for F.6.b) referenced below. In order to remain consistent, the Permittee may want to add this language to the PCGWDMP.

F.6.b) - "The Permittee shall choose and submit to the Ohio EPA the appropriate statistical method within 90 days of the receipt of the last background sampling event data". The PCGWDMP states 180 days instead of 90 days. The time period should be changed to 90 days in the PCGWDMP.