



State of Ohio Environmental Protection Agency

Northwest District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

May 26, 2010

Ms. Lori G. Littrell
Operations Project Manager
Atlantic Richfield Company
28100 Torch Parkway
Warrenville, IL 60555

**Re: Hazardous Waste Permit Modification
Class 1A Approval
BP/Lima Refining Company
OHD 005 051 826 / Ohio Permit #03-02-0390**

Dear Ms. Littrell:

On March 17, 2010, Ohio EPA received a request for a Class 1A (Class 1 requiring prior approval) hazardous waste permit modification (tracking number OHD005051826-100317-1A-1) from Atlantic Richfield Company (BP). With this letter, Ohio EPA approves the above referenced Class 1A modification submitted pursuant to Ohio Administrative Code (OAC) Rule 3745-50-51.

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:

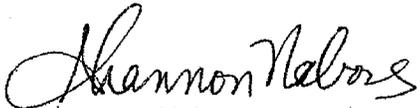
- The statistical analysis component of the Primary Pond Waste Consolidation Area Post-Closure Ground Water Detection Monitoring Plan (PPWCA-PCGWDMP) has been modified. The statistical procedures for determining whether a statistically significant change in ground water quality between upgradient and downgradient wells has occurred has been changed. Additional housekeeping modifications have been made to the plan to reflect current field procedures and other miscellaneous items.
- Modify Permit Condition F.1 Module Highlights to reflect new PPWCA - PCGWDMP date.
- Modify Permit Condition F.3 Indicator Parameters and Monitoring Constituents, Established Background Concentrations to a statistical limit for metals.

Enclosed is a copy of the revised permit terms and conditions. This has been included to ensure that all involved parties have written confirmation of the changes*.

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If you have any questions concerning this action, please contact Don North, DHWM, at 419-373-3074 or George Stuckey, DDAGW, at 419-373-3096 at the Ohio EPA Northwest District Office.

Sincerely,



Shannon Nabors
District Chief
Northwest District Office

*Also, in accordance with Ohio Administrative Code Rule 3745-50-51(D)(1)(a)(ii), the Permittee must 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 Jeremy A. Carroll, P.E., Manager, Regulatory and Information Services Section at (614) 644-2917, or by e-mail at jeremy.carroll@epa.state.oh.us.

/cs

pc: Jeremy Carroll, Manager, RISS, DHWM, CO
Mike Allen, Supervisor, Engineering Unit, DHWM, CO
Don North, DHWM, NWDO
Colleen Weaver, DHWM, NWDO
NWDO File, Lima Refinery Permit
NWDO File, Lima Refinery Permit Terms and Conditions
ec: Gary Deutschman, DHWM, NWDO

5/6/10 CIA mod

Parameter/Constituent	Established Background Concentrations Milligrams per liter (mg/l)
Antimony	SL
Arsenic	SL
Barium	SL
Beryllium	SL
Cadmium	SL
Chromium	SL
Cobalt	SL
Lead	SL
Mercury	SL
Nickel	SL
Selenium	SL
Vanadium	SL
Benzene	0.001
Carbon disulfide	0.001
Chlorobenzene	0.001
Chloroform	0.001
1,2-Dichloroethane	0.001
Ethyl benzene	0.001
Ethylene dibromide	0.00003
Methyl ethyl ketone (2-butanone)	0.010
Styrene	0.001
Toluene	0.001
Xylene	0.002
Anthracene ¹	0.010
Benzenethiol ¹	0.010
Benzo(a)anthracene ¹	0.010
Benzo(a)pyrene ¹	0.0002
Benzo(b)fluoranthrene ¹	0.010
Benzo(k)fluoranthrene ¹	0.010
Bis (2-ethylhexyl) phthalate ¹	0.010
Butyl benzyl phthalate ¹	0.010
Chrysene ¹	0.010

¹ Samples will only be collected and analyzed for these semi-volatile organic compounds (SVOCs) on an annual basis

SL – Statistical Limit listed in PCGWDMF Appendix B.

5/6/10 CIA mod

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), dated March 12, 2010, which was approved by Ohio EPA on May 5, 2010. The PCGWDMP is hereby incorporated into the approved permit application.

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 Wisconsinian in age. The monitoring wells consist of one background well: FW-03S(a), two downgradient wells: FW-13S and FW-18S, and one piezometers, 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 Rules 3745-54-97(A) and (B), the ground water monitoring wells on the map in Figure 2 of 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