



State of Ohio Environmental Protection Agency

Northeast District Office

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

October 25, 2007

RE: BUCKEYE PIPELINE COMPANY LP
3IG00034*FD
PORTAGE COUNTY

Mr. Mark Boneneberger
Environmental Specialist
P.O. Box 368
Emmaus, PA 18049

Dear Mr. Boneneberger:

On October 18, 2007, this writer conducted a compliance evaluation inspection of the Buckeye Pipeline facility located in Mantua, Portage County. The purpose of the inspection was to evaluate compliance with National Pollutant Discharge Elimination System (NPDES) Permit 3IG00034*FD. I was accompanied by Denny Bujak, Operator, Buckeye Pipeline Company. The results of the inspection are summarized below:

General

Buckeye Pipeline Company LP is a bulk terminal handling Propane, Transmix (mix of gas and oil), jet fuel, diesel fuel, and gas.

Wastewater generated

- Storm water from tank farm dikes, station driveway area, and pipeline manifold area.
- Pipeline and tank hydrotest water.
- Product recovery from on-site groundwater remediation activities.
- Sanitary sewage.

Treatment provided

Storm water from the tank farm dikes is routed to an oil/water separator located west of the tank farms. Collected hydrocarbons in the separator are pumped off to an adjacent holding tank area. There are two above ground holding tanks located within a concrete dike. The sump within the dike is routed back to the oil/water separator. Treated discharge from the separator is sent to the existing small pond located directly north of the office. The pond outlets to a swale leading to a grated concrete structure equipped with an underflow structure. The water then flows to the Cuyahoga River via outfall 3IG00034001. At the time of the inspection the outfall was flowing clear and there were no visual problems.

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A groundwater remediation system treats contaminated groundwater from historical releases from the storage tanks. A permit-to-install was approved by the Director of Ohio EPA on December 29, 2006, to install a pump and treat unit. The major components of the system are a 150-gallon oil/water separator, air stripper, filtration system, and two 2,000-lb granular activated carbon units. The discharge from this system is permitted at outfall 3IG00034603 and is tributary to outfall 3IG00034001. On the day of the inspection the system was in full operation.

A review of the compliance history, as identified by our tracking system, for the time period of January 2005 through September 2007 indicated the following violations:

Numeric violations

Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	pH	1D Conc	6.5	6.12	7/12/2006

Frequency violations

Violation Date	Station	Parameter	Sample Frequency	Expected	Reported
1/1/2005	001	Flow Rate	1/Week	1	0
1/8/2005	001	Flow Rate	1/Week	1	0
1/15/2005	001	Flow Rate	1/Week	1	0
1/22/2005	001	Flow Rate	1/Week	1	0
1/1/2005	001	Total Precipitation	1/Month	1	0
2/1/2005	001	Flow Rate	1/Week	1	0
2/8/2005	001	Flow Rate	1/Week	1	0
2/15/2005	001	Flow Rate	1/Week	1	0
2/22/2005	001	Flow Rate	1/Week	1	0
2/1/2005	001	Total Precipitation	1/Month	1	0
3/1/2005	001	Flow Rate	1/Week	1	0
3/8/2005	001	Flow Rate	1/Week	1	0
3/15/2005	001	Flow Rate	1/Week	1	0
3/22/2005	001	Flow Rate	1/Week	1	0
3/1/2005	001	Phenol	1/Quarter	1	0
3/1/2005	001	Naphthalene	1/Quarter	1	0
3/1/2005	001	Total Precipitation	1/Month	1	0
4/1/2005	001	Flow Rate	1/Week	1	0
4/8/2005	001	Flow Rate	1/Week	1	0
4/15/2005	001	Flow Rate	1/Week	1	0
4/22/2005	001	Flow Rate	1/Week	1	0
4/1/2005	001	Total Precipitation	1/Month	1	0
5/1/2005	001	Flow Rate	1/Week	1	0
5/8/2005	001	Flow Rate	1/Week	1	0

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Violation Date	Station	Parameter	Sample Frequency	Expected	Reported
5/15/2005	001	Flow Rate	1/Week	1	0
5/22/2005	001	Flow Rate	1/Week	1	0
5/1/2005	001	Total Precipitation	1/Month	1	0
6/1/2005	001	Flow Rate	1/Week	1	0
6/8/2005	001	Flow Rate	1/Week	1	0
6/15/2005	001	Flow Rate	1/Week	1	0
6/22/2005	001	Flow Rate	1/Week	1	0
6/1/2005	001	Phenol	1/Quarter	1	0
6/1/2005	001	Naphthalene	1/Quarter	1	0
6/1/2005	001	Total Precipitation	1/Month	1	0
7/1/2005	001	Flow Rate	1/Week	1	0
7/8/2005	001	Flow Rate	1/Week	1	0
7/15/2005	001	Flow Rate	1/Week	1	0
7/22/2005	001	Flow Rate	1/Week	1	0
9/1/2005	001	Flow Rate	1/Week	1	0
9/8/2005	001	Flow Rate	1/Week	1	0
9/15/2005	001	Flow Rate	1/Week	1	0
9/22/2005	001	Flow Rate	1/Week	1	0
8/1/2005	001	Flow Rate	1/Week	1	0
8/8/2005	001	Flow Rate	1/Week	1	0
8/15/2005	001	Flow Rate	1/Week	1	0
8/22/2005	001	Flow Rate	1/Week	1	0
8/1/2005	001	Naphthalene	1/Quarter	1	0
10/1/2005	001	Flow Rate	1/Week	1	0
10/8/2005	001	Flow Rate	1/Week	1	0
10/15/2005	001	Flow Rate	1/Week	1	0
10/22/2005	001	Flow Rate	1/Week	1	0
12/1/2005	001	Flow Rate	1/Week	1	0
12/8/2005	001	Flow Rate	1/Week	1	0
12/15/2005	001	Flow Rate	1/Week	1	0
12/22/2005	001	Flow Rate	1/Week	1	0
12/1/2005	001	Naphthalene	1/Quarter	1	0
11/1/2005	001	Flow Rate	1/Week	1	0
11/8/2005	001	Flow Rate	1/Week	1	0
11/15/2005	001	Flow Rate	1/Week	1	0
11/22/2005	001	Flow Rate	1/Week	1	0
3/1/2006	001	Flow Rate	1/Week	1	0
8/1/2006	001	Phenol	1/Quarter	1	0
8/1/2006	001	Naphthalene	1/Quarter	1	0
7/1/2007	001	Flow Rate	1/Week	1	0
7/15/2007	001	Flow Rate	1/Week	1	0
7/22/2007	001	Flow Rate	1/Week	1	0
8/8/2007	001	Flow Rate	1/Week	1	0
8/15/2007	001	Flow Rate	1/Week	1	0

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Violation			Sample		
Date	Station	Parameter	Frequency	Expected	Reported
8/22/2007	001	Flow Rate	1/Week	1	0
8/1/2007	602	Phenol	1/Quarter	1	0
8/1/2007	602	Naphthalene	1/Quarter	1	0

Noted above was the presence of an oil/water separator. Reportedly, this separator replaced a lined pond that previously received contaminated groundwater from a passive collection system. Our files do not contain an approved permit-to-install for the installation of the separator. If you have this approval, please forward a copy to this writer. Attached you will find a schematic of the most updated facility layout we have, depicting the site and the various treatment components. Please verify its accuracy.

If you should have any questions concerning any of the above, feel free to contact this writer at (330) 963-1136.

Sincerely,

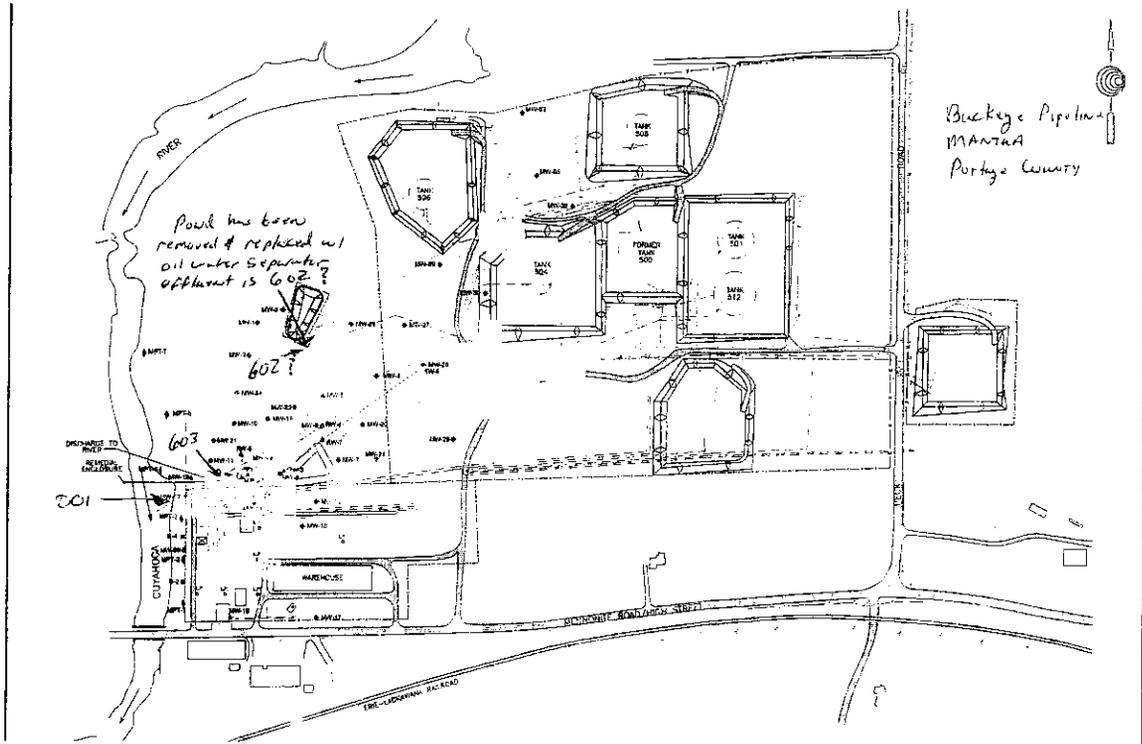


Philip P. Rhodes, P.E.
Environmental Engineer
Division of Surface Water

PPR/mtmt

attachments

File: Industrial Permit/Compliance



Buckeye Pipeline Mantua 10/18/2007 Oil/water separator



Buckeye Pipeline - Mantua 10/18/2007 Pond
which receives oil/water separator effluent

