



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

May 22, 2013

RE: BUCKEYE PIPE LINE COMPANY  
PERMIT NO: 3IG00034  
PORTAGE COUNTY

Mr. Nicholas Frosini, Specialist, HSSE Compliance  
Buckeye Terminals, LLC  
469 Moon Clinton Road  
Coraopolis, PA 15108

Dear Mr. Frosini:

On April 15, 2013, an inspection of the above referenced facility was conducted to obtain and review information for drafting a renewal of the facility's National Pollutant Discharge Elimination System (NPDES) wastewater permit. The facility was represented by Mr. Kyle Claussen, Resident Delivery Person. The purpose of the inspection was to: (1) evaluate the facility's compliance status with respect to the terms and conditions of the above-referenced NPDES permit; and (2) determine required additional actions to be undertaken as part of the permit renewal process.

During the inspection, the following items were noted:

1. All fuel enters and exits the facility via pipeline.
2. The facility employs approximately 13 employees.
3. The facility is staffed seven days/week.
4. The facility consists of the following five active tanks and one active relief tank:

<u>Tank#</u>	<u>Safe Fill (Gallons)</u>	<u>Contents</u>
501	2,300,844	ultra low diesel
504	606,690	trans-mix tank – pumped to PA
506	1,257,900	fuel grade - train grade, high sulfur content
508	1,263,486	trans-mix
512	3,191,118	gasoline
550	16,926	“relief tank”
5. A tank used to store bottom water was also present. This tank is not numbered and no piping is connected to it. All wastewater is physically hauled to this tank.
6. All tank bottom water is trucked to Central Ohio, Inc. in Columbus Ohio.
7. No vehicle maintenance is performed on site.
8. Haley & Aldrich, out of Cleveland, are contracted to operate the facility's groundwater remediation system. The system was not operating at the time of the inspection.
9. Haley & Aldrich is also contracted to collect the facility's NPDES permit samples. It should be noted that all samples are required to be iced down and placed in a cooler during transportation.
10. Haley & Aldrich is also responsible for submitting the facility's electronic discharge monitoring reports.
11. All of the diked areas were inspected. No visible signs of a release were observed.

12. Mr. Claussen indicated that the groundwater remediation system and facility grounds are inspected daily seven days per week. The facility inspection includes all of the bulk storage tanks, diked areas, and manifold area.
13. No discharge was occurring at outfall 3IG00034001. No visual impact to the Cuyahoga River was observed.
14. The Cuyahoga River is monitored downstream of outfall 3IG00034001 (south of High Street bridge) two times per day.
15. A permanent marker at the outfall was posted per the requirement of Part II, Letter M of the facility's NPDES permit
16. It is recommended that internal stations 3IG00034602 and 3IG00034603 be clearly identified to aid in future inspections.

This office has recently reviewed your self-monitoring reports covering the period October 1, 2007 through April 30, 2013 for the referenced facility. Our review indicates violations of the terms and conditions of your NPDES permit. The specific instances of noncompliance are as follows:

#### Limit Violations

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00550	Oil and Grease, Total	1D Conc	10	46.2	12/9/2008

#### Frequency Violations

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	50050	Flow Rate	1/Week	1	0	11/8/2007
001	50050	Flow Rate	1/Week	1	0	11/15/2007
001	50050	Flow Rate	1/Week	1	0	11/22/2007
001	50050	Flow Rate	1/Week	1	0	12/8/2009
001	50050	Flow Rate	1/Week	1	0	12/15/2009
001	50050	Flow Rate	1/Week	1	0	12/22/2009
001	50050	Flow Rate	1/Week	1	0	6/1/2012
001	50050	Flow Rate	1/Week	1	0	6/15/2012
001	50050	Flow Rate	1/Week	1	0	6/22/2012

Please be advised that such instances of noncompliance may be cause for enforcement actions pursuant to the Ohio Revised Code, Chapter 6111.

The facility's renewal NPDES is currently being drafted and will be Public Noticed in the near future. At this time, you will have a 30 day period to evaluate this permit and comment in writing any concerns you may have.

BUCKEYE PIPE LINE COMPANY  
MAY 22, 2013  
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Should you have any comments or questions concerning this letter, please feel free to call me at (330) 963-1143.

Respectfully,

A handwritten signature in blue ink that reads "Michael W. Stevens". The signature is written in a cursive style.

Michael W. Stevens  
Environmental Engineer  
Division of Surface Water

MWS/cs

cc: Michael Cirjac, Terminal Manager, Buckeye Pipe Line Oil Company