



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

June 12, 2013

RE: BUCKEYE LORAIN TERMINAL  
PERMIT NO. 3IN00059  
LORAIN COUNTY  
GRAFTON

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

Dear Mr. Frosini:

On April 30, 2013, an inspection of the above referenced facility was conducted. The facility was represented by Mr. Ron Sheridan, Environmental Control Technician. The purpose of the inspection was to evaluate the operation and maintenance of the treatment system along with the facility's compliance status with respect to the terms and conditions of the above referenced National Pollutant Discharge Elimination System (NPDES) permit.

During the inspection, the following items were noted/discussed:

1. Buckeye Partners, L.P. recently purchased the property from BP Products North America.
2. Buckeye Terminals, LLC took over operations of the bulk terminal on February 1, 2012.
3. The dike area was being drained to the treatment system via a catch basin located inside the northwest corner of the earthen dike area. No oil sheen was observed.
4. Filter fabric was installed in the catch basin in December 2012.
5. The treatment system consists of a 1,000 gallon rectangular aeration vault and a 20,000 gallon oil/water separator. The vault is aerated 24 hrs per day 7 days per week. The wastewater is cycled between the two treatment units prior to being discharge through outfall 3IN00059001.
6. Mr. Sheridan indicated that the vault is inspected daily and documented.
7. Mr. Sheridan also indicated that the oil/water separator is stick tested monthly to determine the amount of oil captured in the system. This information is recorded and maintained in a log book.
8. The discharge from the treatment system was observed. No oil sheen or odor was noted.
9. The roadside discharge pipe from outfall 3IN00059001 was also observed. No oil sheen or other visual impact to the roadside ditch was noted.
10. Test America, Inc. is contracted to perform the analytical analysis of the effluent samples.
11. Mr. Sheridan collects the grab the samples and ships them over night. The grab samples are iced down immediately.
12. The pH reading is taken on site.
13. A pHep pH meter by Hanna is used to test for pH.
14. The pH meter is calibrated with buffer solutions of 7.01 and 10.00.

15. It was noted that the buffer solution was nearing the expiration date. New buffer solution should be purchased.
16. Benzene and toluene historically have had permit limit exceedances at outfall 3IN00059001. The need for additional treatment at outfall 3IN00059001 has been discussed over the past several years with BP Products. During the last inspection on November 16, 2011, BP Products indicated that effluent quality is believed to have improved as a result of some compromised piping underneath the additive dike area being replaced. It was believed that the compromised piping would allow various components of BTEX to infiltrate the piping leading to the oil/water separator during periods when the groundwater level is elevated. **Based on the ongoing Limit violations cited below, it appears that additional treatment may be needed to prevent the ongoing limit violations.**
17. Mr. Sheridan indicated that no EPA reportable spill at the loading rack area has occurred since the last inspection on November 16, 2011.
18. The facility's Spill Prevention Control and Countermeasure Plan was updated in a June 2012.
19. Mr. Sheridan confirmed that the facility's catch basins are still scheduled to be cleaned once every two years. The catch basins are scheduled to be cleaned again at the end of 2013.

This office has recently reviewed your self-monitoring reports covering the period February 1, 2012 through May 31, 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	34010	Toluene	1D Conc	20	44.	8/27/2012
001	34030	Benzene	1D Conc	20	22.	8/27/2012
001	34010	Toluene	1D Conc	20	70.	1/14/2013

No frequency or code violations were noted.

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

Should you have any comments or questions concerning this letter, please feel free to call me at (330) 963-1143.

Respectfully,



Michael W. Stevens  
Environmental Engineer  
Division of Surface Water

MWS/cs