



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023
CERTIFIED MAIL-RETURN RECEIPT REQUESTED

September 27, 2005

Mr. Pierce W. Wagner
Environmental Coordinator
Buckeye Pipe Line Co., L.P.
P.O. Box 368
Emmaus, PA 18049

Re: Authorization to Discharge Under the Remediation General Permit (RGP) –
MAG910000 at the Ludlow Terminal; Ludlow, MA. **Authorization #MAG910101**

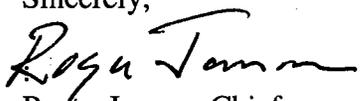
Dear Mr. Wagner:

Based on the review of your notice of intent (NOI) for the Ludlow Terminal, the US Environmental Protection Agency (EPA) hereby authorizes you to discharge in accordance with the provisions of Remediation General Permit (RGP) at that site. This letter and authorization terminate any and all exclusion letters that EPA issued for this discharge at your site or facility prior to this date and close out any and all NPDES applications submitted to EPA prior to this date for an individual permit for this discharge. Your authorization number is listed above.

The enclosed checklist designates the monitoring parameters applicable to your discharge. However, note that the checklist does not represent the complete requirements of the RGP. Operators must comply with all of the applicable requirements of the general permit, including influent monitoring, narrative water quality standards, sampling, record keeping, and reporting requirements, found in Part I, Part II, and Appendices I – VIII, of the RGP. See EPA's website for the complete general permit and other RGP information at: <http://www.epa.gov/region1/npdes/mass.html#dgp> (for discharges in MA) and <http://www.epa.gov/region1/npdes/newhampshire.html#dgp> (for discharges in NH). This general permit and authorization to discharge expire on September 9, 2010.

Please contact George Papadopoulos at (617) 918-1579 or Doug Corb at (617) 918-1565 if you have any questions.

Sincerely,


Roger Janson, Chief
Municipal Permits Branch

Enclosure

Cc: Paul Hogan, MA DEP

Summary of applicable monitoring parameters¹ under the Remediation General Permit (RGP)

Facility/Site Name:

Facility/Site Address:

If checked, monitor the parameter	Parameter to be monitored (see Parts I.C. and I.D. and Appendix III of the RGP for specific limits and requirements)	If checked, monitor the parameter	Parameter to be monitored (see Parts I.C. and I.D. and Appendix III of the RGP for specific limits and requirements)
✓	1. Total Suspended Solids (TSS)		28. Trichloroethylene (TCE)
	2. Total Residual Chlorine (TRC)		29. Vinyl Chloride (Chloroethene)
✓	3. Total Petroleum Hydrocarbons (TPH)		30. Acetone
	4. Cyanide (CN) ²		31. 1,4 Dioxane
✓	5. Benzene (B)		32. Total Phenols
✓	6. Toluene (T)		33. Pentachlorophenol (PCP)
✓	7. Ethylbenzene (E)		34. Total Phthalates
✓	8. (m,p,o) Xylenes (X)		35. Bis (2-Ethylhexyl) Phthalate
✓	9. Total BTEX ³	✓	36. Total Group I Polycyclic Aromatic Hydrocarbons
	10. Ethylene Dibromide (EDB)	✓	a. Benzo(a) Anthracene
	11. Methyl-tert-Butyl Ether (MtBE)	✓	b. Benzo(a) Pyrene
	12. tert-Butyl Alcohol (TBA)	✓	c. Benzo(b)Fluoranthene
	13. tert-Amyl Methyl Ether (TAME)	✓	d. Benzo(k)Fluoranthene
✓	14. Naphthalene	✓	e. Chrysene
	15. Carbon Tetrachloride	✓	f. Dibenzo(a,h)anthracene
	16. 1,4 Dichlorobenzene (p-DCB)	✓	g. Indeno(1,2,3-cd) Pyrene
	17. 1,2 Dichlorobenzene (o-DCB)	✓	37. Total Group II Polycyclic Aromatic Hydrocarbons
	18. 1,3 Dichlorobenzene (m-DCB)	✓	h. Acenaphthene
	19. Total dichlorobenzene	✓	i. Acenaphthylene
	20. 1,1 Dichloroethane (DCA)	✓	j. Anthracene
	21. 1,2 Dichloroethane (DCA)	✓	k. Benzo(ghi) Perylene
	22. 1,1 Dichloroethylene (DCE)	✓	l. Fluoranthene
	23. cis-1,2 Dichloro-ethylene (DCE)	✓	m. Fluorene
	24. Dichloromethane (Methylene Chloride)	✓	n. Naphthalene
	25. Tetrachloroethylene (PCE)	✓	o. Phenanthrene
	26. 1,1,1 Trichloro-ethane (TCA)	✓	p. Pyrene
	27. 1,1,2 Trichloro-ethane (TCA)		38. Total Polychlorinated Biphenyls (PCBs) ⁴

If checked, monitor the parameter	Parameter to be monitored (see Parts I.C. and I.D. and Appendix III of the RGP for specific limits and requirements)	If checked, monitor the parameter	Parameter to be monitored (see Parts I.C. and I.D. and Appendix III of the RGP for specific limits and requirements)
	39. Antimony	✓	53. Total Flow
	40. Arsenic	✓	54. pH Range for Class A & Class B Waters in MA
	41. Cadmium		55. pH Range for Class SA & Class SB Waters in MA
	42. Chromium III (trivalent)		56. pH Range for Class B Waters in NH
	43. Chromium VI (hexavalent)		57. Daily maximum temperature - Warm water fisheries
	44. Copper		58. Daily maximum temperature - Cold water fisheries
	45. Lead		59. Maximum Change in Temperature in MA - Any Class A water body
	46. Mercury		60. Maximum Change in Temperature in MA - Warm Water
	47. Nickel		61. Maximum Change in Temperature in MA - Cold Water and Lakes/Ponds
	48. Selenium		62. Maximum Change in Temperature in MA - Coastal
	49. Silver		63. Maximum Change in Temperature in MA - July to September
	50. Zinc		64. Maximum Change in Temperature in MA - October to June
	51. Iron		<i>Other parameters (as indicated on NOI):</i>
	52. Instantaneous Flow		

Footnotes:

1. This checklist does not represent the complete requirements of the RGP. Operators must comply with all of the applicable requirements of the remediation general permit (RGP), including influent monitoring, narrative water quality standards, etc. Operators must follow the RGP, including Parts I, II, and Appendices I - VIII in order to comply with the specific applicable requirements.

2. Limits for cyanide are based on EPA's water quality criteria expressed as micrograms (ug) of free cyanide per liter. There is currently no EPA approved test method for free cyanide. Therefore, total cyanide must be reported.

3. BTEX = Sum of Benzene, Toluene, Ethylbenzene, total Xylenes.

4. In the November 2002 WQC, EPA has revised the definition of Total PCBs for aquatic life as "total PCBs is the sum of all homologue, all isomer, all congener, or all Aroclor analyses."