



"Wagner, Pierce W."
<PWagner@buckeye.com>
09/16/2005 03:55 PM

To GeneralPermits NPDES/R1/USEPA/US@EPA
cc
bcc
Subject Buckeye Pipe Line Co., LP - Hydrostatic Pressure Test
Discharge - Ludlow, MA

VIA FACSIMILE and Electronic Mailing

September 16, 2005

Mr. Michael O'Brien
U.S. EPA, Region 1 – New England
One Congress Street – Suite 1100
Boston, MA 02114-2023
Fax: 617.918.0505
Email: NPDES.Generalpermits@epa.gov

Mr. Bob Kubit
MA DEP
Fax: 508.791.4131

**RE: Notice of Intent to Discharge (NOI), September 2005
Hydrostatic Pressure Test Water Discharge
Massachusetts General Permit, Permit No. MAG910000
Buckeye Pipe Line Co., LP (Buckeye)
Ludlow Terminal, Ludlow, MA**

Dear Sirs,

Enclosed please find a completed NOI form for the above referenced General Permit. Also enclosed please find previous mailing to the USEPA in regard to requests for discharge in the outdated format of an Exclusion Letter. Please expedite the permitting process.

Buckeye intended to start the discharge of Hydrostatic Test Water on or about September 27, 2005. We hope that the NOI will be activated in time to discharge water at that time.

Buckeye has attempted contact with personnel at the U.S. Fish and Wildlife Service to determine the status of the Endangered Species near the discharge point. However, the point of contact will not be available until Sept. 20, 2005.

Buckeye is also following this correspondence with a mailing to the MA DEP. The subsequent mailing is in regard to the required fee for the Permit Transmittal W068398. A check for the required fee of \$385.00 will be enclosed.

Thank you for all of your help. Should you require additional information regarding this matter, please contact me at the letterhead address, via telephone at (484) 232-4427, or via email at pwagner@buckeye.com.

Sincerely,

Pierce W. Wagner, CHMM
Environmental Coordinator

Enclosures

<<050916_Notice of Intent_General Permit910000.pdf>> <<Mechanical Site Plan_Ludlow.pdf>>
<<Treatment System Map.pdf>> <<050812_Discharge Request Letter.pdf>> <<050826_NPDES
Exclusion App.pdf>>

Pierce W. Wagner, CHMM
Environmental Coordinator
Buckeye Partners, LP
P.O. Box 368
5002 Buckeye Rd.
Emmaus, PA 18049

Office: 484.232.4427
Cell: 610.217.4179

Email: pwagner@buckeye.com  050916_Notice of Intent_General Permit910000.pdf  Mechanical Site Plan_Ludlow.pdf
 Treatment System Map.pdf  050812_Discharge Request Letter.pdf  050826_NPDES Exclusion App.pdf

B. Suggested Form for Notice of Intent (NOI) for the Remediation General Permit

MA TRANSMITTAL #
W068398

1. General site information. Please provide the following information about the site:

a) Name of facility/site: Ludlow Terminal - Buckeye Pipe Line Co., LP		Facility/site address: Ludlow Terminal	
Location of facility/site: longitude: 72.4992 latitude: 42.1872	Facility SIC code(s): 4613	Street: Tank Farm Rd	
b) Name of facility/site owner: Buckeye Pipe Line Co., LP		Town: Ludlow	
Email address of owner: pwagner@buckeye.com	State: MA	Zip: 01056	County: Hampden
Telephone no. of facility/site owner: 484-232-4000	Owner is (check one): 1. Federal _____ 2. State/Tribal _____		
Fax no. of facility/site owner: 484-232-4549	3. Private <input checked="" type="checkbox"/> 4. other, if so, describe: _____		
Address of owner (if different from site): Buckeye Pipe Line Co., LP			
Street: PO Box 368			
Town: Emmaus	State: PA	Zip: 18049	County: Lehigh
c) Legal name of operator: Buckeye Pipe Line Co., LP		Operator telephone no: 484-232-4000	
		Operator fax no.: 484-232-4549	Operator email: pwagner@buckeye.com
Operator contact name and title: Pierce W. Wagner, Env. Coord.			
Address of operator (if different from owner):		Street:	
Town:	State:	Zip:	County:
d) Check "yes or no" for the following: Letter Dated 4/16/96			
1. Has a prior NPDES permit exclusion been granted for the discharge? Yes <input checked="" type="checkbox"/> No _____ if "yes," number:		Cancelled Permit MA0034614	
2. Has a prior NPDES application (Form 1 & 2C) ever been filed for the discharge? Yes <input checked="" type="checkbox"/> No _____, if "yes," date and tracking #:			
3. Is the discharge a "new discharge," defined by 40 CFR _____ No <input checked="" type="checkbox"/>			
4. For sites in Massachusetts, is the discharge covered under the MA Contingency Plan (MCP) and exempt from state permitting? Yes No <input checked="" type="checkbox"/>			

<p>e) Is site/facility subject to any State permitting or other action which is causing the generation of discharge? Yes ___ No^x ___</p> <p>If "yes," please list:</p> <ol style="list-style-type: none"> 1. site identification # assigned by the state of NH or MA: 2. permit or license # assigned: 3. state agency contact information: name, location, and telephone number: 	<p>f) Is the site/facility covered by any other EPA permit, including:</p> <ol style="list-style-type: none"> 1. multi-sector storm water general permit? Y ___ N <u>XX</u> if Y, 2. phase I or II construction storm water general permit? Y ___ N <u>XXX</u>, if Y, number: 3. individual NPDES permit? Y ___ Nxxx, if Y, number: 4. any other water quality related permit? Y ___ N_xxx_, if Y,
---	--

2. Discharge information. Please provide information about the discharge, (attaching additional sheets as needed) including:

a) Describe the discharge activities for which the owner/applicant is seeking coverage:

Discharge of Pipeline and Tank Hydrostatic Test Water. Petroleum impacted waters will be filter though GAC System prior to discharge.

b) Provide the following information about each discharge:	1) Number of discharge points: 1	2) What is the maximum and average flow rate of discharge (in cubic feet per second, ft ³ /s)? Max. flow <u>1 cuft / sec</u> Average flow <u>300 gpm</u> Is maximum flow a design value ? y - Nxxx For average flow, include the units and appropriate notation if this value is a design value or estimate if not available. <div style="border: 1px solid black; padding: 2px; display: inline-block; margin: 5px;">ESTIMATED</div>
--	---	---

3) Latitude and longitude of each discharge within 100 feet: pt 1 Long. :72.4992 , lat. 42.1072

4) If hydrostatic testing, total volume of the discharge (gals): <u>1.68 Million Gallons Est.</u>	5) Is the discharge intermittent <u>X</u> or seasonal <u>9</u> Is discharge ongoing Yes ___ No <u>9</u>
--	--

c) Expected dates of discharge (mm/dd/yy): start end Start 9/27/05 END 10/10/05

d) Please attach a line drawing or flow schematic showing water flow through the facility including:

1. sources of intake water, 2. contributing flow from the operation, 3. treatment units, and 4. discharge points and receiving waters(s).

N/A

N/A

Attached

Attached

3. Contaminant information. In order to complete this section, the applicant will need to take a minimum of one sample of the untreated water and have it analyzed for all of the parameters listed in Appendix III. Historical data, (i.e., data taken no more than 2 years prior to the effective date of the permit) may be used if obtained pursuant to: i. Massachusetts' regulations 310 CMR 40.0000, the Massachusetts Contingency Plan ("Chapter 21E"); ii. New Hampshire's Title 50 RSA 485-A: Water Pollution and Waste Disposal or Title 50 RSA 485-C: Groundwater Protection Act; or iii. an EPA permit exclusion letter issued pursuant to 40 CFR 122.3, provided the data was analyzed with test methods that meet the requirements of this permit. Otherwise, a new sample shall be taken and analyzed.

a) Based on the analysis of the sample(s) of the untreated influent, the applicant must check the box of the sub-categories that the potential discharge falls within.

Gasoline Only	VOC Only	Primarily Metals	Urban Fill Sites	Contaminated Sumps	Mixed Contaminants	Aquifer Testing
Fuel Oils (and Other Oils) only	VOC with Other Contaminants	Petroleum with Other Contaminants	Listed Contaminated Sites	Contaminated Dredge Condensates	Hydrostatic Testing of Pipelines/Tanks	Well Development or Rehabilitation

b) Based on the analysis of the untreated influent, the applicant must indicate whether each listed chemical is believed present or believed absent in the potential discharge. Attach additional sheets as needed.

PARAMETER	Believe Absent	Believe Present	# of Samples (1 minimum)	Type of Sample (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method	Maximum daily value		Avg. daily value	
							concentration (ug/l)	mass (kg)	concentration (ug/l)	mass (kg)
1. Total Suspended Solids		x								
2. Total Residual Chlorine	x									
3. Total Petroleum Hydrocarbons		x								
4. Cyanide	x									
5. Benzene		x								
6. Toluene		x								
7. Ethylbenzene		x								
8. (m,p,o) Xylenes		x								
9. Total BTEX4		x								

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

PARAMETER	Believe Absent	Believe Present	# of Samples (1 minimum)	Type of Sample (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method	Maximum daily value		Avg. daily value	
							concentration (ug/l)	mass (kg)	concentration (ug/l)	mass (kg)
10. Ethylene Dibromide 5 (1,2- Dibromo-methane)	X									
11. Methyl-tert-Butyl Ether (MtBE)	X									
12. tert-Butyl Alcohol (TBA)	X									
13. tert-Amyl Methyl Ether (TAME)	X									
14. Naphthalene		X								
15. Carbon Tetrachloride	X									
16. 1,4 Dichlorobenzene	X									
17. 1,2 Dichlorobenzene	X									
18. 1,3 Dichlorobenzene	X									
19. 1,1 Dichloroethane	X									
20. 1,2 Dichloroethane	X									
21. 1,1 Dichloroethylene	X									
22. cis-1,2 Dichloroethylene	X									
23. Dichloromethane (Methylene Chloride)	X									
24. Tetrachloroethylene	X									

5 EDB is a groundwater contaminant at fuel spill and pesticide application sites in New England.

PARAMETER	Believe Absent	Believe Present	# of Samples (1 minimum)	Type of Sample (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method	Maximum daily value		Avg. daily Value	
							concentration (ug/l)	mass (kg)	concentration (ug/l)	mass (kg)
25. 1 1 1 Trichloroethane ^o	X									
26.1 1 2 Trichloroethane ^o	X									
27. Trichloroethylene	X									
28. Vinyl Chloride	X									
29. Acetone	X									
30.1,4 Dioxane	X									
31. Total Phenols	X									
32. Pentachlorophenol	X									
33. Total Phthalates ⁶ (Phthalate esthers)	X									
34. Bis (2-Ethylhexyl) Phthalate [Di-(ethylhexyl) Phthalate]	X									
35. Total Group I Polycyclic Aromatic Hydrocarbons (PAH)		X								
a. Benzo(a) Anthracene		X								
b. Benzo(a) Pyrene		X								
c. Benzo(b)Fluoranthene		X								
d. Benzo(k) Fluoranthene		X								
e. Chrysene		X								

⁶ The sum of individual phthalate compounds.

PARAMETER	Believe Absent	Believe Present	# of Samples (1 minimum)	Type of Sample (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method	Maximum daily value		Average daily value	
							concentration (ug/l)	mass (kg)	concentration (ug/l)	mass (kg)
f. Dibenzo(a,h) anthracene		X								
g. Indeno(1,2,3-cd) Pyrene		X								
36. Total Group II Polycyclic Aromatic Hydrocarbons (PAH)		X								
h. Acenaphthene		X								
i. Acenaphthylene		X								
j. Anthracene		X								
k. Benzo(ghi) Perylene		X								
l. Fluoranthene		X								
m. Fluorene		X								
n. Naphthalene-		X								
o. Phenanthrene		X								
p. Pyrene		X								
37. Total Polychlorinated Biphenyls (PCBs)	X									
38. Antimony	X									
39. Arsenic	X									
40. Cadmium	X									
41. Chromium III	X									
42. Chromium VI	X									

PARAMETER	Believe Absent	Believe Present	# of Samples (1 minimum)	Type of Sample (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method	Maximum daily value		Avg. daily value	
							concentration (ug/l)	mass (kg)	concentration (ug/l)	mass (kg)
43. Copper	x									
44. Lead	x									
45. Mercury	x									
46. Nickel	x									
47. Selenium	x									
48. Silver	x									
49. Zinc	x									
50. Iron	x									
Other (describe):										

c) For discharges where **metals** are believed present, please fill out the following: *N/A NO METALS BELIEVED IN DISCHARGE*

<p>Step I - Do any of the metals in the influent have a reasonable potential to exceed the effluent limits in Appendix III (i.e., the limits set at zero to five dilutions)? Y <u> </u> N <u> </u></p>	<p>If yes, which metals?</p>
<p>Step 2 - For any metals which have reasonable potential to exceed the Appendix III limits, calculate the dilution factor (DF) using the formula in Part I.A.3.c) (step 2) of the NOI instructions or as determined by the State prior to the submission of this NOI. What is the dilution factor for applicable metals? Metals: _____ DF: _____</p>	<p>Look up the limit calculated at the corresponding dilution factor in Appendix IV. Do any of the metals in the influent have the potential to exceed the corresponding effluent limits in Appendix IV (i.e., is the influent concentration above the limit set at the calculated dilution factor)? Y <u> </u> N <u> </u> If "Yes," list which metals:</p>

4. Treatment system information. Please describe the treatment system using separate sheets as necessary, including:

a) A description of the treatment system, including a schematic of the proposed or existing treatment system:						
b) Identify each applicable treatment unit (check all that apply):	Frac.tank	Air stripper	Oil/water separator	Equalization tanks	Bag filter	GAC filter
	Chlorination	Dechlorination	Other (please describe):			
c) Proposed average and maximum flow rates (gallons per minute) for the discharge and the design flow rate(s) (gallons per minute) of the treatment system: <u>300 gpm</u> Average flow rate of discharge <u>300gpm</u> Maximum flow rate of treatment system <u>300 gpm</u> Design flow						
d) A description of chemical additives being used or planned to be used (attach MSDS sheets): <u>N/A</u>						

5. Receiving surface water(s). Please provide information about the receiving water(s), using separate sheets as necessary:

a) Identify the discharge pathway:	Direct <u> </u>	Within facility <u> </u>	Storm drain <u> </u>	River/brook <u>xxx</u>	Wetlands <u> </u>	Other (describe):
b) Provide a narrative description of the discharge pathway, including the name(s) of the receiving waters: <u>Unnamed Tributary to Higher Brook to Chicopee River</u>						
c) Attach a detailed map(s) indicating the site location and location of the outfall to the receiving water: 1. For multiple discharges, number the discharges sequentially. 2. For indirect dischargers, indicate the location of the discharge to the indirect conveyance and the discharge to surface water The map should also include the location and distance to the nearest sanitary sewer as well as the locus of nearby sensitive receptors (based on USGS topographical mapping), such as surface waters, drinking water supplies, and wetland areas.						
d) Provide the state water quality classification of the receiving water <u>Class B, Warm Water</u>						
e) Provide the reported or calculated seven day-ten year low flow (7Q 1 0) of the receiving water <u>1440</u> cfs Please attach any calculation sheets used to support stream flow and dilution calculations.						
f) Is the receiving water a listed 303(d) water quality impaired or limited water? <u>NO</u> (d) water quality impaired or limited water? <u>YES</u> If yes, for which pollutant(s)? <u>Phosphorus > Chicopee River</u>						

6. Results of Consultation with Federal Services: Please provide the following information according to requirements of Part I.B.4 and Appendices II and VII.

a) Are any listed threatened or endangered species, or designated critical habitat, in proximity to the discharge? Yes XXX No
Has any consultation with the federal services been completed? No X or is consultation underway? YES XX No
What were the results of the consultation with the U.S. Fish and NW Service and/or National Marine Fisheries Service (G- one):
a "no jeopardy" opinion? or written concurrence on a finding that the discharges are not likely to adversely affect any endangered species or critical habitat?

b) Are any historic properties listed or eligible for listing on the National Register of Historic Places located on the facility or site or in proximity to the discharge?
Yes No XXX Have any state or tribal historic preservation officer been consulted in this determination (Massachusetts only)? Yes No XXX

7. Supplemental information.

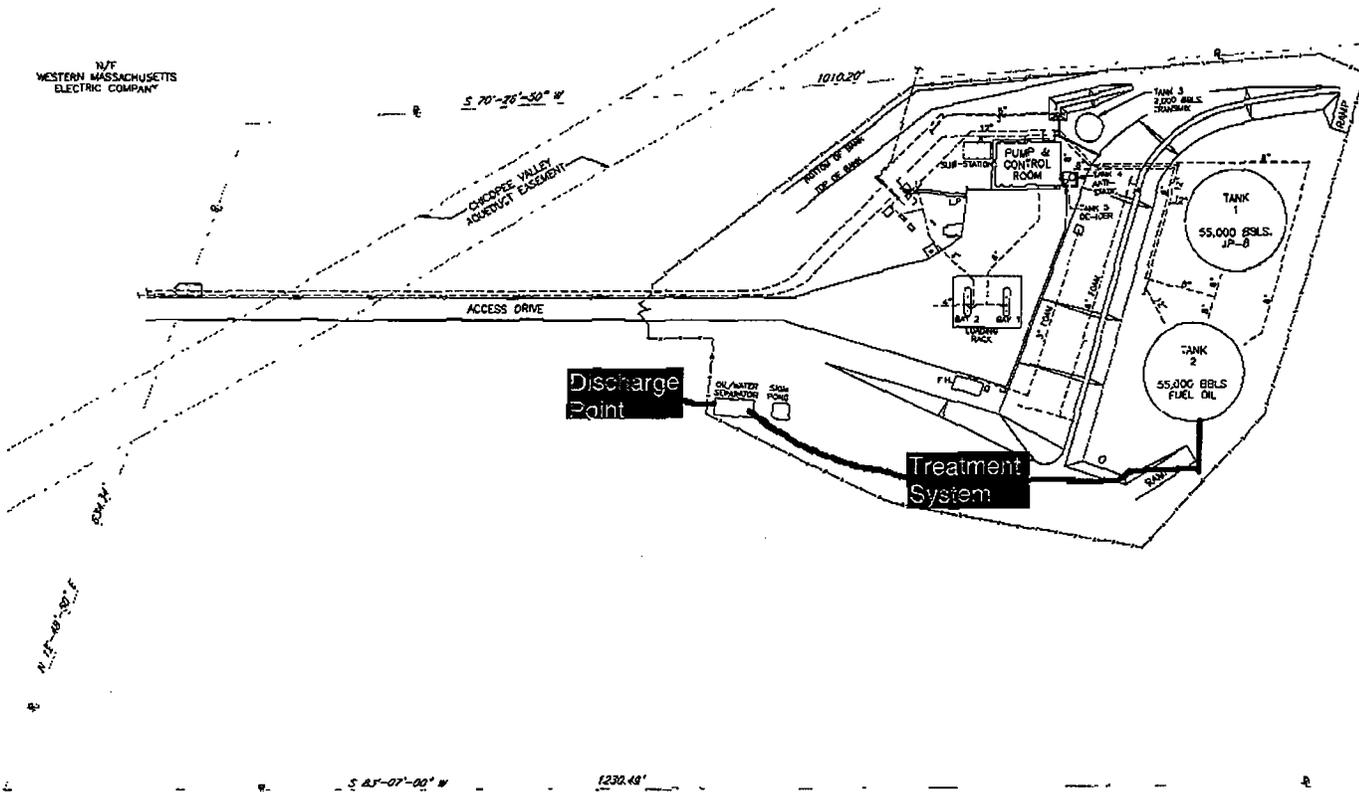
Please provide any supplemental information. Attach any analytical data used to support the application. Attach any certification(s) required by the general permit.

8. Signature Requirements: The Notice of Intent must be signed by the operator in accordance with the signatory requirements of 40 CFR Section 122.22, including the following certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I certify that I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Facility/Site Name: LUDLOW TERMINAL - BUCKEYE PIPE LINE CO., LP
Operator signature: Pierce W. Wagner PIERCE W. WAGNER, CHMM
Title: ENV COORD
Date: 9/16/05

N/F
WESTERN MASSACHUSETTS
ELECTRIC COMPANY



NOTES

1. SEE DRAWING LDGPO001 FOR PLOT PLAN KEY PLAN

LEGEND

- PIPE - ABOVE GRADE
- - - PIPE - BELOW GRADE

UNAPPROVED

NO	LOG	DESCRIPTION OF REVISION	DATE

BUCKEYE PIPE LINE CO.

MECHANICAL
SITE
PLAN

JACKLOW STATION, MASSACHUSETTS

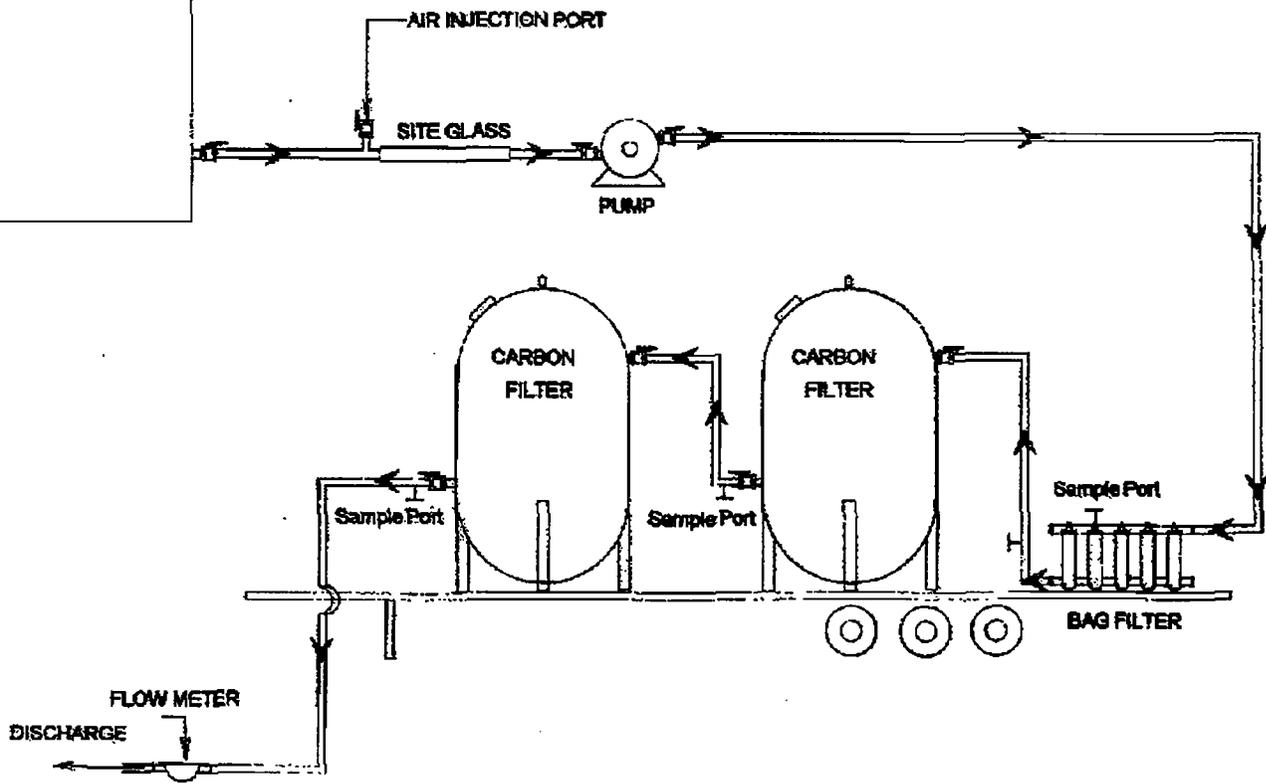
DATE: 11/24/23
SCALE: 1" = 50'
DRAWN: LDGPO001
APPROVED: [Signature] CHECKED: [Signature]

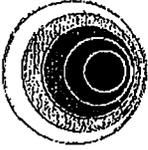


TSD
PAGE

HOLDING TANK

PROACT SERVICES CORPORATION	TITLE TREATMENT SYSTEM		
	SIZE	Date: 9/8/05	DWG NO
For use by ProAct only	SCALE NTS		REV 1
Drawings By: Gerard Smiddy			SHEET 1





BUCKEYE PIPE LINE COMPANY

August 12, 2005

5002 Buckeye Road
Emmaus, Pennsylvania 18049
Tel (484) 232-4000
Fax (484) 232-4541

Michael O'Brien
USEPA REGION 1
1 Congress Street
Suite 1100
Boston, MA 02114-2023

**RE: Hydrostatic Test Water Discharge
Buckeye Pipe Line Company, L.P. – Ludlow Terminal
Tank Farm Road
Hampden County, Ludlow, MA**

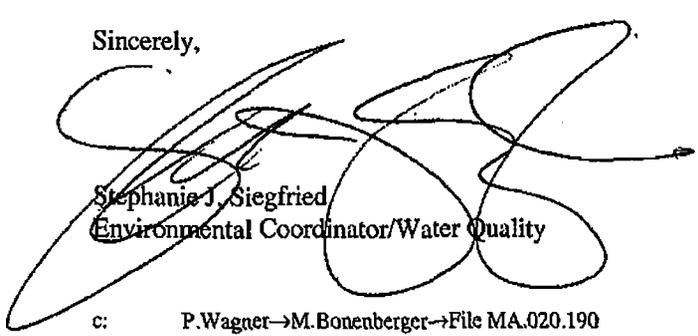
Dear Mr. O'Brien:

This letter is written and submitted to request authorization to discharge approximately 40,000 barrels (1.68 million gallons) of hydrostatic test water at the above-referenced location. We anticipate the discharge to take place sometime during the week of September 19, 2005 and will last 10-14 days.

The hydrostatic test will be on a pipeline coming to Ludlow that will be in contact with petroleum product. The water will be discharged into Tank #2 and then processed through an on-site carbon treatment system. Once treated, plans are to discharge the water to the oil/water separator which empties at our existing outfall.

I appreciate your timely review of our discharge request. If there should be any questions or should you require additional information, please contact me at ssiegfried@buckeye.com or 484-232-4486.

Sincerely,



Stephanie J. Siegfried
Environmental Coordinator/Water Quality

c: P.Wagner→M.Bonenberger→File MA.020.190
D.Fancher



Buckeye Partners, L. P.
P. O. Box 368
Emmaus, PA 18049-0368

FAX DATE: 8-26-05

TO: Michael J O'Brien 617-918-1505

FROM: Stephanie Siegfried

SUBJECT: Ludlow Permit Exclusion Application

Total Pages being Sent - Including this page: 4

If you have any questions, please contact ^{Steph} ~~Claudine~~, the sender at
484.232.4403 or fax 484.232.4549.

4480

Environmental Department



NPDES PERMIT EXCLUSION APPLICATION - INCIDENT NOTIFICATION REPORT

HBR CASE NO.

U.S. EPA - Region I, One Congress Street, Suite 1100 (HBR), BOSTON, MA 02114

NPDES Exclusion Ref.#

Received: / /

Military Time:

GRANTED BY:

A) REPORTER INFO.

Requested by: Pierce Wagner
 Organization Name: Buckeye Pipe Line Company, L.P.
 Address: 5002 Buckeye Rd. PO Box 368
 City: Emmaus County: Lehigh State: PA
 Zip: 18049 Phone No. (484) 232-4427 Ext:

B) DIS-CHARGER/ PERMITTEE/ OWNER

Same As Above In A Name/Company Name
 Address: Contact:
 City: County: State:
 Zip: Phone No. () Ext:

C) DISCHARGE INCIDENT LOCATION

Same As Above In B Site Location Name: Ludlow Station
 Address: Tank Farm Rd
 City: Ludlow County: Hampden State: MA
 Zip: 01056 Phone No. (413) 583-4033 Ext:

D) DATES

Discharge Start Date: 9/19/05 Discharge Duration: 9/29/05

E) GROUND WATER CONT.

Contaminant 1	Contaminant 2	Contaminant 3
Approx. Concentration		
Contaminant 4	Contaminant 5	Contaminant 6
Approx. Concentration		

F) TREATMENT SYSTEM

Treatment Equipment: (check applicable)
 Eric Tank Airstripper Oil/Water Separator
 GAC Filter Bag Filter
 Equalization Tanks: Other => Describe:

Written Description of System:
2 bed system containing manipulated active carbon sampling midfluent + effluent.

G) RECEIVING WATERS

Discharge VIA: (check applicable) Direct Storm Drain Wetlands Unnamed River/Stream Overland Unknown
 Within Facility Other => Describe:

Receiving Waterway Name: UNT to Higher Brook to Chicopee River

H) PURPOSE OF DISCHARGE

Dewatering Activity: (check applicable) UST Replacement/Removal Contaminated Excavation Pump Test
 Recovery & Treatment Other => Describe: Refined pet. products pipeline hydrostatic pressure testing
 Description

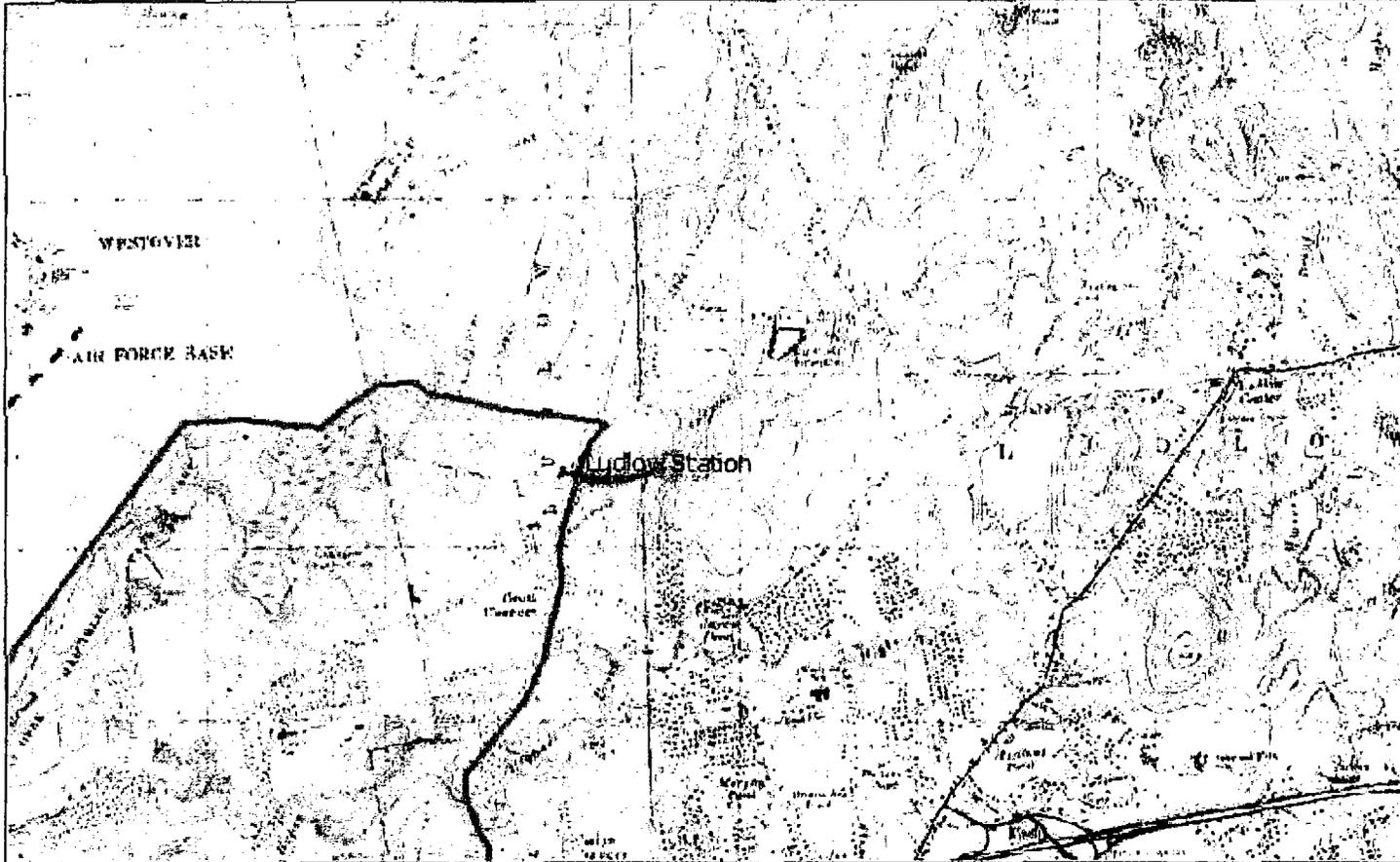
I) FLOW

Maximum Flow Rate: 300 GPM

J) INFO

Site ID #:
 Agency Name: Contact:
 Agency Name: Contact:

Buckeye Terminals, LLC - Ludlow Terminal



-  Pipeline
-  Block Valve
-  Check Valve
-  Appurt
-  Gravitometer
-  Roads
-  Interstate
-  Hydro
-  Facility
-  Hospitals
-  Hotels
-  Parks
-  Parcels



1: 41260

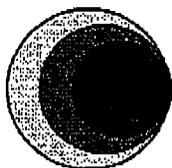
Note: Tank Farm Road Ludlow, MA

Buckeye Partners
April 26, 2001



To ensure that surface water standards are not exceeded, the Hydrotest water will be analyzed for the following potential pollutants before discharge:

Total Petroleum Hydrocarbons	<5 ppm
Total BTEX	<100 ppb
Napthalene	<20 ppb
MtBE	<70 ppb
Total Suspended Solids	<60 mg/l
Oil & Grease	<30 mg/l
Iron	<7.0 mg/l
pH	6-9
Dissolved Oxygen	Minimum of 5.0 mg/l



Buckeye Partners, L. P.
P. O. Box 368
Emmaus, PA 18049-0368

FAX DATE: 9/16/05
TO: Mr. Michael O'Brien Fx 617. 918. 0505.
Mr. Bob Kubit Fx 508. 791. 4131
FROM: Pierce Wagner Ph 484. 232. 4407
Fx 484 232 4549
SUBJECT: LUDLOW TERMINAL - BUCKEYE DISCHARGE

Total Pages being Sent - Including this page: 18

If you have any questions, please contact Claudine, the sender at 484.232.4403 or fax 484.232.4549.

Environmental Department



**BUCKEYE PIPE LINE COMPANY***Facsimile and Electronic Mailing*

September 16, 2005

Mr. Michael O'Brien
U.S. EPA, Region 1 – New England
One Congress Street – Suite 1100
Boston, MA 02114-2023
Fax: 617.918.0505
Email: NPDES.Generalpermits@epa.gov

5002 Buckeye Road
Emmaus, Pennsylvania 18049
Tel: (484) 232-4000

Mr. Bob Kubicki (484) 232-4541
MA DEP
Fax: 508.791.4131

**RE: Notice of Intent to Discharge (NOI), September 2005
Hydrostatic Pressure Test Water Discharge
Massachusetts General Permit, Permit No. MAG910000
Buckeye Pipe Line Co., LP (Buckeye)
Ludlow Terminal, Ludlow, MA**

Dear Sirs,

Enclosed please find a completed NOI form for the above referenced General Permit. Also enclosed please find previous mailing to the USEPA in regard to requests for discharge in the outdated format of an Exclusion Letter. Please expedite the permitting process.

Buckeye intended to start the discharge of Hydrostatic Test Water on or about September 27, 2005. We hope that the NOI will be activated in time to discharge water at that time.

Buckeye has attempted contact with personnel at the U.S. Fish and Wildlife Service to determine the status of the Endangered Species near the discharge point. However, the point of contact will not be available until Sept. 20, 2005.

Buckeye is also following this correspondence with a mailing to the MA DEP. The subsequent mailing is in regard to the required fee for the Permit Transmittal W068398. A check for the required fee of \$385.00 will be enclosed.

Thank you for all of your help. Should you require additional information regarding this matter, please contact me at the letterhead address, via telephone at (484) 232-4427, or via email at pwagner@buckeye.com.

Sincerely,

Pierce W. Wagner, CHMM
Environmental Coordinator

Enclosures

B. Suggested Form for Notice of Intent (NOI) for the Remediation General Permit

MA TRANSMITTAL #
W068398

I. General site information. Please provide the following information about the site:

a) Name of facility/site: Ludlow Terminal - Buckeye Pipe Line Co., LP		Facility/site address: Ludlow Terminal	
Location of facility/site: longitude: 72.4992 latitude: 42.1872		Facility SIC code(s): 4613	Street: Tank Farm Rd
b) Name of facility/site owner: Buckeye Pipe Line Co., LP		Town: Ludlow	
Email address of owner: pwagner@buckeye.com		State: MA	Zip: 01056 County: Hampden
Telephone no. of facility/site owner: 484-232-4000		Owner is (check one): 1. Federal ___ 2. State/Tribal ___	
Fax no. of facility/site owner: 484-232-4549		3. Private <input checked="" type="checkbox"/> 4. other, if so, describe:	
Address of owner (if different from site): Buckeye Pipe Line Co., LP			
Street: PO Box 368			
Town: Emmaus	State: PA	Zip: 18049	County: Lehigh
c) Legal name of operator: Buckeye Pipe Line Co., LP		Operator telephone no: 484-232-4000	
		Operator fax no.: 484-232-4549	Operator email: pwagner@buckeye.com
Operator contact name and title: Pierce W. Wagner, Env. Coord.			
Address of operator (if different from owner):		Street:	
Town:	State:	Zip:	County:
d) Check "yes or no" for the following: Letter Dated 4/16/96			
1. Has a prior NPDES permit exclusion been granted for the discharge? Yes <input checked="" type="checkbox"/> No ___ if "yes," number:			
2. Has a prior NPDES application (Form 1 & 2C) ever been filed for the discharge? Yes <input checked="" type="checkbox"/> No ___ , if "yes," date and tracking #: Cancelled Permit MA0034614			
3. Is the discharge a "new discharge" as defined by 40 CFR No <input checked="" type="checkbox"/>			
4. For sites in Massachusetts, is the discharge covered under the MA Contingency Plan (MCP) and exempt from state permitting? Yes ___ No <input checked="" type="checkbox"/>			

e) Is site/facility subject to any State permitting or other action which is causing the generation of discharge? Yes ___ No X
 If "yes," please list:
 1. site identification # assigned by the state of NH or MA:
 2. permit or license # assigned:
 3. state agency contact information: name, location, and telephone number:

f) Is the site/facility covered by any other EPA permit, including:
 1. multi-sector storm water general permit? Y ___ N XX if Y,
 2. phase I or II construction storm water general permit? Y ___ N XX,
 if Y, number:
 3. individual NPDES permit? Y ___ Nxxx, if Y, number:
 4. any other water quality related permit? Y ___ N_xxx_, if Y,

2. Discharge information. Please provide information about the discharge, (attaching additional sheets as needed) including:

a) Describe the discharge activities for which the owner/applicant is seeking coverage:

Discharge of Pipeline and Tank Hydrostatic Test Water. Petroleum impacted waters will be filter through GAC System prior to discharge.

b) Provide the following information about each discharge:	1) Number of discharge points:	2) What is the maximum and average flow rate of discharge (in cubic feet per second, ft ³ /s)? Max. flow <u>1 cuft / sec</u> Average flow <u>300 gpm</u> Is maximum flow a design value? y - Nxxx For average flow, include the units and appropriate notation if this value is a design value or estimate if not available.
	<u>1</u>	<u>ESTIMATED</u>

3) Latitude and longitude of each discharge within 100 feet: pt 1 Long. : 72.4992 , lat. 42.1872

4) If hydrostatic testing, total volume of the discharge (gals): <u>1.68 Million Gallons Est.</u>	5) Is the discharge intermittent <u>X</u> or seasonal ___ ⁹ Is discharge ongoing Yes ___ No ___ ⁹
c) Expected dates of discharge (mm/dd/yy): start end <u>Start 9/27/05 END 10/10/05</u>	

d) Please attach a line drawing or flow schematic showing water flow through the facility including:

1. sources of intake water, 2. contributing flow from the operation, 3. treatment units, and 4. discharge points and receiving waters(s).

N/A

N/A

Attached

Attached

3. Contaminant information. In order to complete this section, the applicant will need to take a minimum of one sample of the untreated water and have it analyzed for all of the parameters listed in Appendix III. Historical data, (i.e., data taken no more than 2 years prior to the effective date of the permit) may be used if obtained pursuant to: i. Massachusetts' regulations 310 CMR 40.0000, the Massachusetts Contingency Plan ("Chapter 21E"); ii. New Hampshire's Title 50 RSA 485-A: Water Pollution and Waste Disposal or Title 50 RSA 485-C: Groundwater Protection Act; or iii. an EPA permit exclusion letter issued pursuant to 40 CFR 122.3, provided the data was analyzed with test methods that meet the requirements of this permit. Otherwise, a new sample shall be taken and analyzed.

a) Based on the analysis of the sample(s) of the untreated influent, the applicant must check the box of the sub-categories that the potential discharge falls within.

Gasoline Only	VOC Only	Primarily Metals	Urban Fill Sites	Contaminated Sumps	Mixed Contaminants	Aquifer Testing
Fuel Oils (and Other Oils) only	VOC with Other Contaminants	Petroleum with Other Contaminants	Listed Contaminated Sites	Contaminated Dredge Condensates	Hydrostatic Testing of Pipelines/Tanks	Well Development or Rehabilitation

b) Based on the analysis of the untreated influent, the applicant must indicate whether each listed chemical is believed present or believed absent in the potential discharge. Attach additional sheets as needed.

PARAMETER	Believe Absent	Believe Present	# of Samples (1 minimum)	Type of Sample (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method	Maximum daily value		Avg. daily value	
							concentration (ug/l)	mass (kg)	concentration (ug/l)	mass (kg)
1. Total Suspended Solids		x								
2. Total Residual Chlorine	x									
3. Total Petroleum Hydrocarbons		x								
4. Cyanide	x									
5. Benzene		x								
6. Toluene		x								
7. Ethylbenzene		x								
8. (m,p,o) Xylenes		x								
9. Total BTEX4		x								

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

PARAMETER	Believe Absent	Believe Present	# of Samples (1 minimum)	Type of Sample (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method	Maximum daily value		Avg. daily value	
							concentration (ug/l)	mass (kg)	concentration (ug/l)	mass (kg)
10. Ethylene Dibromide 5 (1,2- Dibromo-methane)	X									
11. Methyl-tert-Butyl Ether (MtBE)	X									
12. tert-Butyl Alcohol (TBA)	X									
13. tert-Amyl Methyl Ether (TAME)	X									
14. Naphthalene		X								
15. Carbon Tetrachloride	X									
16. 1,4 Dichlorobenzene	X									
17. 1,2 Dichlorobenzene	X									
18. 1,3 Dichlorobenzene	X									
19. 1,1 Dichloroethane	X									
20. 1,2 Dichloroethane	X									
21. 1,1 Dichloroethylene	X									
22. cis-1,2 Dichloroethylene	X									
23. Dichloromethane (Methylene Chloride)	X									
24. Tetrachloroethylene	X									

5 EDB is a groundwater contaminant at fuel spill and pesticide application sites in New England.

PARAMETER	Believe Absent	Believe Present	# of Samples (1 minimum)	Type of Sample (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method	Maximum daily value		Avg. daily Value	
							concentration (ug/l)	mass (kg)	concentration (ug/l)	mass (kg)
25. 1 1 1 Trichloroethane *	x									
26.1 1 2 Trichloroethane *	x									
27. Trichloroethylene	x									
28. Vinyl Chloride	x									
29. Acetone	x									
30.1,4 Dioxane	x									
31. Total Phepols	x									
32. Pentachlorophenol	x									
33. Total Phthalates ⁶ (Phthalate esthers)	x									
34. Bis (2-Ethylhexyl) Phthalate [Di- (ethylhexyl) Phthalate]	x									
35. Total Group I Polycyclic Aromatic Hydrocarbons (PAH)		x								
a. Benzo(a) Anthracene		x								
b. Benzo(a) Pyrene		x								
c. Benzo(b)Fluoranthene		x								
d. Benzo(k) Fluoranthene		x								
e. Chrysene		x								

⁶ The sum of individual phthalate compounds.

PARAMETER	Believe Absent	Believe Present	# of Samples (1 minimum)	Type of Sample (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method	Maximum daily value		Average daily value	
							concentration (ug/l)	mass (kg)	concentration (ug/l)	mass (kg)
f. Dibenzo(a,h) anthracene		X								
g. Indeno(1,2,3-cd) Pyrene		X								
36. Total Group II Polycyclic Aromatic Hydrocarbons (PAH)		X								
h. Acenaphthene		X								
i. Acenaphthylene		X								
j. Anthracene		X								
k. Benzo(ghi) Perylene		X								
l. Fluoranthene		X								
m. Fluorene		X								
n. Naphthalene-		X								
o. Phenanthrene		X								
p. Pyrene		X								
37. Total Polychlorinated Biphenyls (PCBs)	X									
38. Antimony	X									
39. Arsenic	X									
40. Cadmium	X									
41. Chromium III	X									
42. Chromium VI	X									

PARAMETER	Believe Absent	Believe Present	# of Samples (1 minimum)	Type of Sample (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method	Maximum daily value		Avg. daily value	
							concentration (ug/l)	mass (kg)	concentration (ug/l)	mass (kg)
43. Copper	X									
44. Lead	X									
45. Mercury	X									
46. Nickel	X									
47. Selenium	X									
48. Silver	X									
49. Zinc	X									
50. Iron	X									
Other (describe):										

c) For discharges where metals are believed present, please fill out the following: *N/A NO METALS BELIEVED IN DISCHARGE*

<p>Step 1 - Do any of the metals in the influent have a reasonable potential to exceed the effluent limits in Appendix III (i.e., the limits set at zero to five dilutions)? Y <u>N</u></p>	<p>If yes, which metals?</p>
<p>Step 2 - For any metals which have reasonable potential to exceed the Appendix III limits, calculate the dilution factor (DF) using the formula in Part I.A.3.c) (step 2) of the NOI instructions or as determined by the State prior to the submission of this NOI. What is the dilution factor for applicable metals? Metals: _____ DF: _____</p>	<p>Look up the limit calculated at the corresponding dilution factor in Appendix IV. Do any of the metals in the influent have the potential to exceed the corresponding effluent limits in Appendix IV (i.e., is the influent concentration above the limit set at the calculated dilution factor)? Y ___ N ___ If "Yes," list which metals:</p>

4. Treatment system information. Please describe the treatment system using separate sheets as necessary, including:

a) A description of the treatment system, including a schematic of the proposed or existing treatment system:

b) Identify each applicable treatment unit (check all that apply):	Frac.tank	Air stripper	Oil/water separator	Equalization tanks	Bag filter	<u>GAC filter</u>
	Chlorination	Dechlorination	Other (please describe):			

c) Proposed average and maximum flow rates (gallons per minute) for the discharge and the design flow rate(s) (gallons per minute) of the treatment system:
300 gpm Average flow rate of discharge 300gpm Maximum flow rate of treatment system 300 gpm Design flow

d) A description of chemical additives being used or planned to be used (attach MSDS sheets): N/A

5. Receiving surface water(s). Please provide information about the receiving water(s), using separate sheets as necessary:

a) Identify the discharge pathway: Direct Within facility Storm drain River/brook xxx Wetlands Other (describe):

b) Provide a narrative description of the discharge pathway, including the name(s) of the receiving waters:
Unnamed Tributary to Higher Brook to Chicopee River

c) Attach a detailed map(s) indicating the site location and location of the outfall to the receiving water:
 1. For multiple discharges, number the discharges sequentially.
 2. For indirect dischargers, indicate the location of the discharge to the indirect conveyance and the discharge to surface water
 The map should also include the location and distance to the nearest sanitary sewer as well as the locus of nearby sensitive receptors (based on USGS topographical mapping), such as surface waters, drinking water supplies, and wetland areas.

d) Provide the state water quality classification of the receiving water Class B, Warm Water

e) Provide the reported or calculated seven day-ten year low flow (7Q 1 0) of the receiving water 1440 cfs
 Please attach any calculation sheets used to support stream flow and dilution calculations.

f) Is the receiving water a listed 303(d) water quality impaired or limited water? NO (d) water quality impaired or limited water? YES If yes, for which pollutant(s)? Phosphorus > Chicopee River

6. Results of Consultation with Federal Services: Please provide the following information according to requirements of Part I.B.4 and Appendices II and VII.

a) Are any listed threatened or endangered species, or designated critical habitat, in proximity to the discharge? Yes ~~XXX~~ No
 Has any consultation with the federal services been completed? No X or is consultation underway? YES XX No
 What were the results of the consultation with the U.S. Fish and NW Wife Service and/or National Marine Fisheries Service (G- one):
 a "no jeopardy" opinion? or written concurrence on a finding that the discharges are not likely to adversely affect any endangered species or critical habitat?

b) Are any historic properties listed or eligible for listing on the National Register of Historic Places located on the facility or site or in proximity to the discharge?
 Yes No XXX Have any state or tribal historic preservation officer been consulted in this determination (Massachusetts only)? Yes No XXX

7. Supplemental information.

Please provide any supplemental information. Attach any analytical data used to support the application. Attach any certification(s) required by the general permit.

8. Signature Requirements: The Notice of Intent must be signed by the operator in accordance with the signatory requirements of 40 CFR Section 122.22, including the following certification:

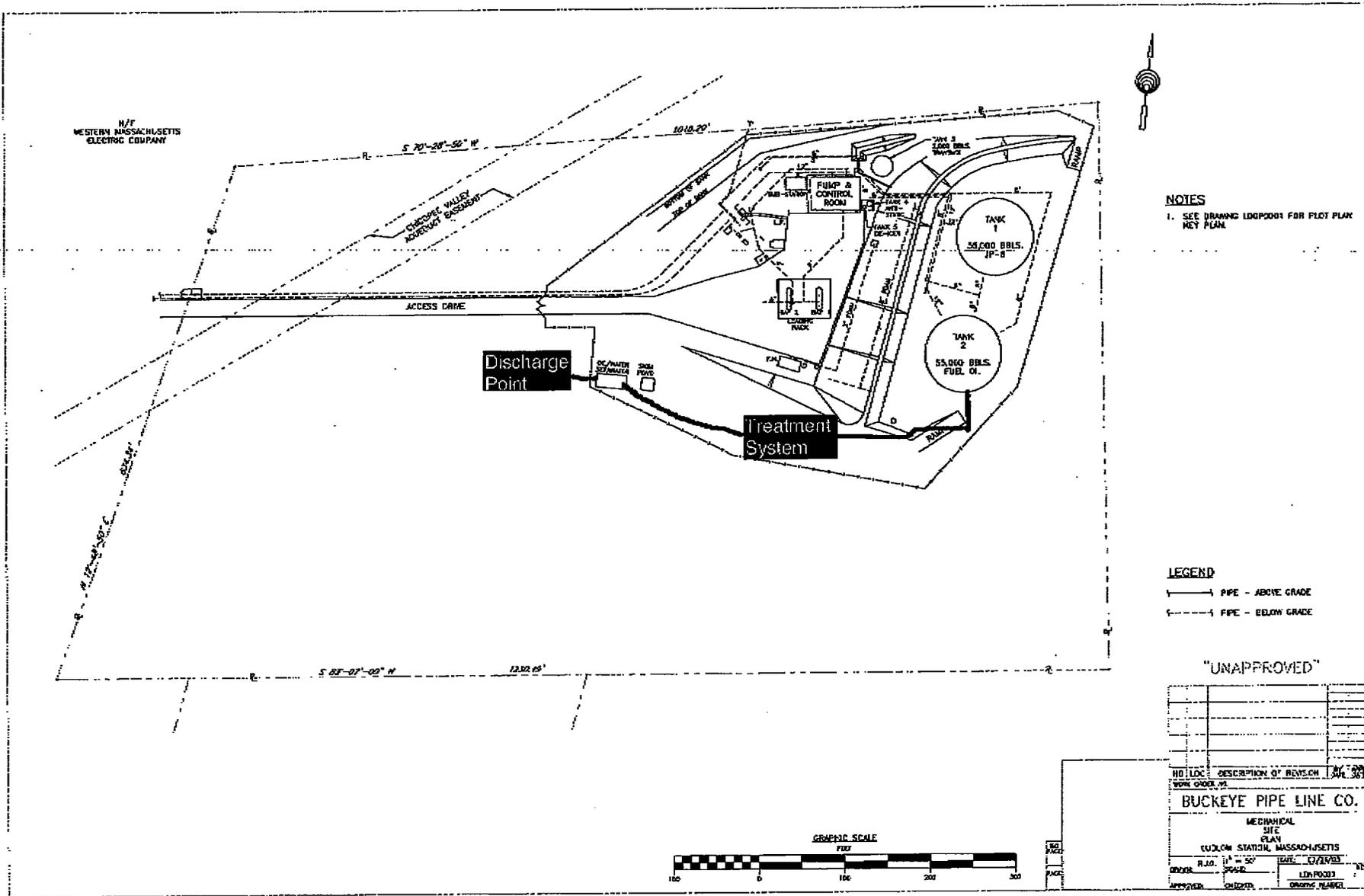
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I certify that I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Facility/Site Name: LUDLOW TERMINAL - BUCKEYE PIPE LINE CO., LD

Operator signature: Pierce W. Wagner PIERCE W. WAGNER, CHMM

Title: ENV COORD

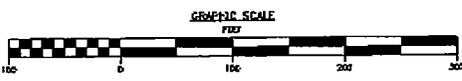
Date: 9/16/05



NOTES
 1. SEE DRAWING LOG0001 FOR PLOT PLAN KEY PLAN

LEGEND
 ——— PIPE - ABOVE GRADE
 - - - - - PIPE - BELOW GRADE

"UNAPPROVED"



"UNAPPROVED"		
NO. LOC.	DESCRIPTION OF REVISION	DATE
BUCKEYE PIPE LINE CO.		
MECHANICAL SITE PLAN		
CUDLOW STATION, MASSACHUSETTS		
SCALE: 1" = 50'	DATE: 07/15/03	
PROJECT: 010001		

N/F
 WESTERN MASSACHUSETTS
 ELECTRIC COMPANY

CHERRY VALLEY
 ADDRESSING BASIN

Discharge Point

Treatment System

TANK 1
 55,000 BBL.
 IP-B

TANK 2
 55,000 BBL.
 FUEL OIL

FUMP &
 CONTROL ROOM

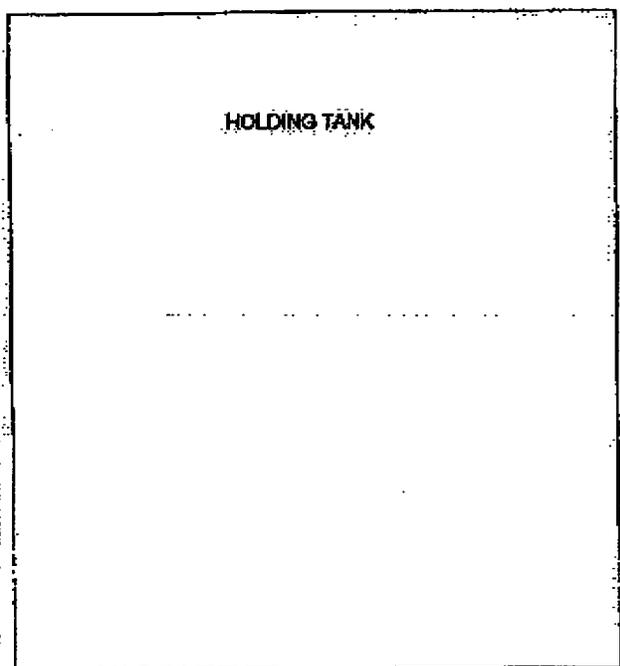
LAUNCH TANK

TANK 5
 55,000 BBL.

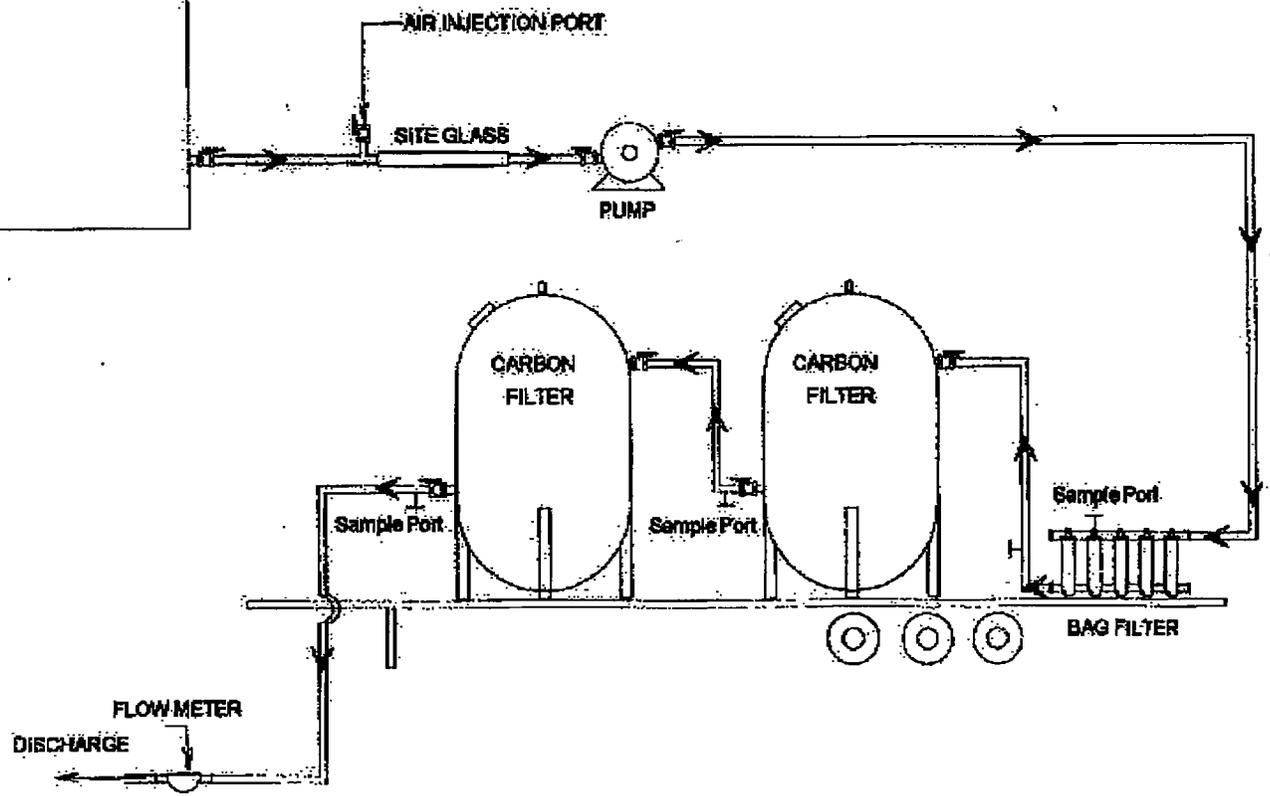
TANK 3
 55,000 BBL.

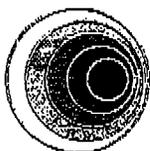
TANK 4
 55,000 BBL.





PROACT SERVICES CORPORATION		TREATMENT SYSTEM		
For use by ProAct only		DATE: 9/8/05	DWG NO	REV 1
Drawings By: Gerard Smiddy		SCALE: NTS	SHEET 1	



**BUCKEYE PIPE LINE COMPANY**

5002 Buckeye Road
Emmaus, Pennsylvania 18049
Tel (484) 232-4000
Fax (484) 232-4541

August 12, 2005

Michael O'Brien
USEPA REGION 1
1 Congress Street
Suite 1100
Boston, MA 02114-2023

**RE: Hydrostatic Test Water Discharge
Buckeye Pipe Line Company, L.P. – Ludlow Terminal
Tank Farm Road
Hampden County, Ludlow, MA**

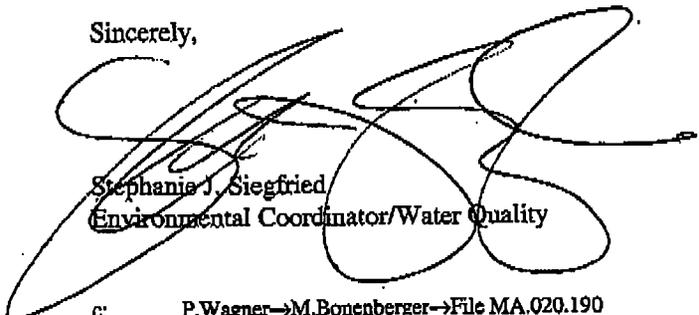
Dear Mr. O'Brien:

This letter is written and submitted to request authorization to discharge approximately 40,000 barrels (1.68 million gallons) of hydrostatic test water at the above-referenced location. We anticipate the discharge to take place sometime during the week of September 19, 2005 and will last 10-14 days.

The hydrostatic test will be on a pipeline coming to Ludlow that will be in contact with petroleum product. The water will be discharged into Tank #2 and then processed through an on-site carbon treatment system. Once treated, plans are to discharge the water to the oil/water separator which empties at our existing outfall.

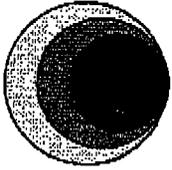
I appreciate your timely review of our discharge request. If there should be any questions or should you require additional information, please contact me at ssiegfried@buckeye.com or 484-232-4486.

Sincerely,



Stephanie J. Siegfried
Environmental Coordinator/Water Quality

c: P.Wagner→M.Bonenberger→File MA.020.190
D.Fancher



Buckeye Partners, L. P.
P. O. Box 368
Emmaus, PA 18049-0368

FAX DATE: 8-26-05

TO: Michael J. O'Brien 617-918-1505

FROM: Stephanie Siegfried

SUBJECT: Ludlow Permit Exclusion Application

Total Pages being Sent - Including this page: 4

If you have any questions, please contact ^{Steph} ~~Claudine~~, the sender at
484.232.4409 or fax 484.232.4549.

484

Environmental Department



NPDES PERMIT EXCLUSION APPLICATION - INCIDENT NOTIFICATION REPORT

U.S. EPA - Region I, One Congress Street, Suite 1100 (HBR), BOSTON, MA 02114

NPDES Exclusion Ref.#

Received: / / Military Time: GRANTED BY:

A) REPORTER INFO.
 Requested by: Pierce Wagner
 Organization Name: Buckeye Pipe Line Company, L.P
 Address: 5002 Buckeye Rd. PO Box 368
 City: Emmatus County: Lehigh State: PA
 Zip: 18049 Phone No. (484) 232-4427 Ext:

B) DIS-CHARGER/ PERMITTEE/ OWNER
 Same As Above In A Name/Company Name
 Address: Contact:
 City: County: State:
 Zip: Phone No. () Ext:

C) DISCHARGE INCIDENT- LOCATION
 Same As Above In B Site Location Name: Ludlow Station
 Address: Tank Farm Rd
 City: Ludlow County: Hampden State: MA
 Zip: 01056 Phone No. (413) 583-4033 Ext:

D) DATES Discharge Start Date: 9/19/05 Discharge Duration: 9/29/05

E) GROUND WATER CONT.	Contaminant 1	Contaminant 2	Contaminant 3
	Approx. Concentration		
	Contaminant 4	Contaminant 5	Contaminant 6
	Approx. Concentration		

F) TREATMENT SYSTEM
 Treatment Equipment: (check applicable)
 Eric Tank GAC Filter Airstripper Bag Filter Oil/Water Separator
 Equalization Tanks: Other => Describe:
 Written Description of System:
2 bed system containing granulated active carbon sampling midfluent + effluent.

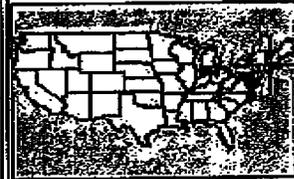
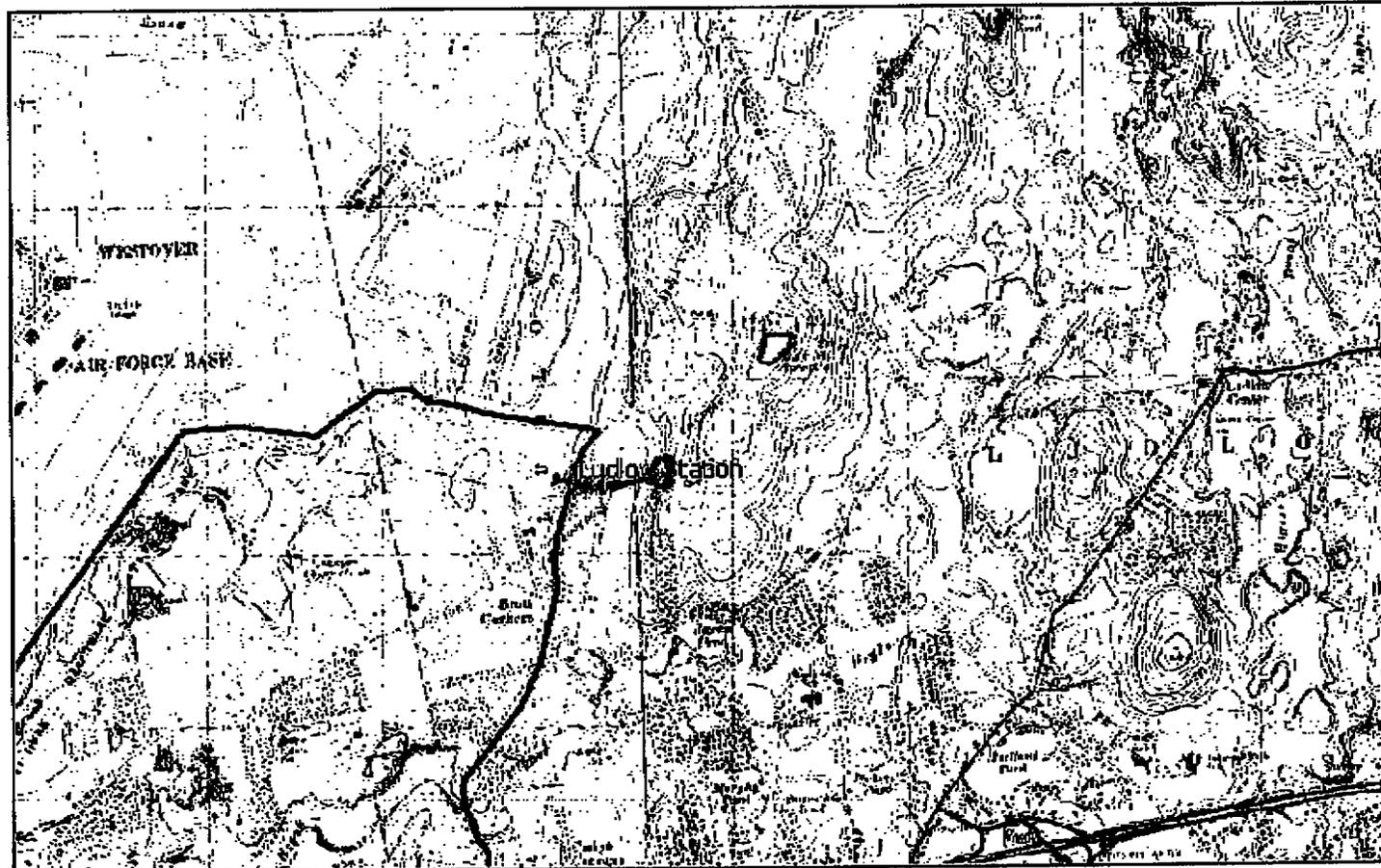
G) RECEIVING WATERS
 Discharge VIA: (check applicable) Direct Storm Drain Wetlands Unnamed River/ Brook Over and Unknown
 Within Facility Other => Describe:
 Receiving Waterway Name: UNT to Higher Brook to Chicopee River

H) PURPOSE OF DISCHARGE
 Dewatering Activity: (check applicable) UST Replacement/Removal Contaminated Excavation Pump Test
 Recovery & Treatment Other => Describe: Refined pet. products pipeline hydrostatic pressure testing
 Description:

I) FLOW Maximum Flow Rate: 300 GPM

J) INFO
 Site ID #: Agency Name: Contact:
 Agency Name: Contact:

Buckeye Terminals, LLC - Ludlow Terminal



- Pipeline
- Block Valve
- Check Valve
- Appurt
- Gravimeter
- Roads
- Interstate
- Hydro
- Facility
- Hospitals
- Hotels
- Parks
- Parcels

N

 1: 41260

Note: Tank Farm Road Ludlow, MA

Buckeye Partners
 April 26, 2001



To ensure that surface water standards are not exceeded, the Hydrotest water will be analyzed for the following potential pollutants before discharge:

Total Petroleum Hydrocarbons	<5 ppm
Total BTEX	<100 ppb
Napthalene	<20 ppb
MtBE	<70 ppb
Total Suspended Solids	<60 mg/l
Oil & Grease	<30 mg/l
Iron	<7.0 mg/l
pH	6-9
Dissolved Oxygen	Minimum of 5.0 mgl