UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 1
5 Post Office Square, Suite 100
BOSTON, MA 02109-3912

VIA EMAIL

August 29, 2017

Brian M. Benito, Jr.
Tennessee Gas Pipeline Company, LLC
8 Anngina Drive
Enfield, CT 06082
brian_benito@kindermorgan.com

Re: Authorization to discharge under the Remediation General Permit (RGP) – Authorization # MAG910716, for the Connecticut Expansion Project, Massachusetts Loop site located in Sandisfield, MA

Dear Mr. Benito:

Based on the review of a Notice of Intent (NOI) dated June 6, 2017 for the site referenced above, the U.S. Environmental Protection Agency, Region 1 (EPA) hereby authorizes Tennessee Gas Pipeline Company, LLC, as the named operator, to discharge in accordance with the provisions of the RGP from this site via Outfall 001 to Spectacle Pond Brook, tributary to Clam River (MA31-03). The authorization number is listed above. The effective date of coverage is the date of this authorization letter.

Enclosed with this RGP authorization to discharge is a summary of the applicable parameters and effluent limitations for your activity category IV, pipeline and tank dewatering discharge. A dilution factor of zero (i.e., 1:1) was used in calculating effluent limits applicable to the proposed discharge from this site. The enclosed summary also provides requirements specific to activity category IV discharges. Please note that this summary does not represent the complete requirements of the RGP. Operators must comply with all of the applicable requirements of the RGP, including influent and effluent monitoring, record keeping, and reporting requirements. For the complete general permit, see EPA's RGP website.[1]

You have reported that your discharges will consist of a total volume of approximately 547,797 gallons. Further you have reported that your average effluent flow will be 600 gallons per minute (gpm) and your maximum effluent flow will be 694 gpm. Under this authorization, the effluent flow limitation is 1.0 million gallons per day (MGD) (i.e., 694 gpm). EPA has determined that, for this discharge, a lower effluent flow also is permissible. Therefore, with this authorization, EPA is proactively approving a Notice of Change (NOC) for decreasing the site-specific effluent flow limitation, as needed. This NOC approval is provided under Part 5.1.2.b of the RGP. EPA is providing this approval to allow this operational flexibility in light of the benefits of a reduced effluent flow for preventing erosion and complying with the Massachusetts Surface Water Quality Standards.

[1] http://www.epa.gov/region1/npdes/rgp.html.

This EPA general permit and authorization to discharge will expire on **April 8, 2022**, or upon Notice of Termination (NOT), whichever occurs first. However, in accordance with Part 5.3 of the general permit, your permit coverage will be administratively continued until issuance of a new RGP. Please note that you must submit a NOT within thirty (30) days of the termination of the discharge. Your discharge is not expected to last twelve (12) months or more. Therefore, EPA expects you will not to be subject to NetDMR reporting requirements. See Part 4.6 and 5.2 of the RGP, and Appendix IV, Part 3 for more information regarding reporting requirements.

In accordance with Part 2.2.1 of the RGP and using the calculation methodology included in Appendix V, your authorization to discharge includes the calculated water quality-based effluent limitations (WQBELs) applicable to this proposed discharge. These effluent limitations are being required in accordance with Part 2.2.4, and/or Part 2.3.3.c of the RGP because EPA was unable to determine from the *source water influent* information provided in the NOI submitted to EPA if the *pipeline dewatering influent* will meet water quality standards.

Your authorization to discharge also includes the following additional monitoring requirements: 1) total suspended solids shall be monitored at the discharge point(s), if any, to the receiving water; and 2) total suspended solids shall be monitored in the receiving water immediately outside the discharge's zone of influence. These additional monitoring requirements are being required in accordance with Part 2.2.4, and/or Part 2.3.3.c of the RGP to assess the effectiveness of best management practices (BMPs) being implemented at the site to meet the BMP provisions in the RGP pertaining to erosion. This letter provides these additional conditions in writing. Monitoring for these parameters shall be conducted in conjunction with the monitoring required for the other parameters applicable in Part 2.1.1 of the RGP.

EPA is aware of other permits applicable to this site that prohibit discharges to resource areas or their buffer zones. Nothing in this permit authorization eliminates your obligation to comply with other permits. Consistent with the Site Management BMP requirements of Part 2.5.2.c, EPA strongly urges implementation of flow control measures at rates which do not result in a discharge within the resource areas or their buffer zones. Specifically, Part 2.5.2 c (iii) of the RGP requires "water quality control measures that ensure that the discharges covered by this general permit do not adversely affect existing water quality by preventing any erosion, stream scouring, or sedimentation, and/or any direct or indirect discharge which contributes additional pollutants." EPA also notes that this authorization to discharge does not supersede any Order of Conditions under Massachusetts Wetlands Protection Act M.G.L. c. 131, §40.

Please ensure that sufficiently sensitive test methods are used for all sample analyses conducted for this permit. To be considered sufficiently sensitive, test methods must achieve minimum levels for analysis for a given parameter that is no greater than the effluent limitation for that parameter, unless otherwise specified in the RGP for that parameter. Where no effluent limitation applies, EPA has provided the ML required with the enclosed summary.

Thank you in advance for your cooperation in this matter. Please contact Shauna Little at (617) 918-1989 or little.shauna@epa.gov, if you have any questions.

Sincerely,

Thelma Murphy

Thelma Murphy, Chief
Storm Water and Construction Permits Section

Enclosure

cc: Lealdon Langley, MassDEP, via email
Xiaodan Ruan, MassDEP, via email
Paula Terrasi, Massachusetts Pipeline Awareness Network, via email
Cathy Kristofferson, Massachusetts Pipeline Awareness Network, via email
Jane Winn, Berkshire Environmental Action Team, via email

Table 1: Authorization Information

Permit Number	MAG910716
Receiving Water	Spectacle Pond Brook
Outfall Number	Outfall 001
Monitoring Requirements	See Part 4.1 and Part 4.4.1 of the RGP
Reporting Requirement	See Part 4.6.1 of the RGP; NetDMR not required

Table 2: Chemical-Specific Effluent Limitations and Monitor-Only Requirements[1]

Parameter	Effluent Limitation
A. Inorganics	
Ammonia[2]	Report mg/L
Chloride[3]	Report µg/L
Total Residual Chlorine[4]	11 µg/L
Total Suspended Solids	30 mg/L
Antimony[5]	206 µg/L
Arsenic[5]	10 µg/L
Cadmium[5]	0.0824 µg/L
Chromium III[5]	23.2 µg/L
Chromium VI[5]	11.4 µg/L
Copper[5]	2.4 µg/L
Iron[5]	1,000 µg/L
Lead[5]	0.41 µg/L
Mercury[5]	0.739 µg/L
Nickel[5]	13.4 µg/L
Selenium[5]	5.0 µg/L
Silver[5]	0.2 µg/L
Zinc[5]	30.8 µg/L
Cyanide[6]	5.2 µg/L
B. Non-Halogenated Volatile Organic Compounds	
Total BTEX	100 µg/L
Benzene	5.0 µg/L
1,4 Dioxane	200 µg/L
Acetone	7.97 mg/L
Phenol	300 µg/L
C. Halogenated Volatile Organic Compounds	
Carbon Tetrachloride	1.6 µg/L
1,2 Dichlorobenzene	600 µg/L
1,3 Dichlorobenzene	320 µg/L
1,4 Dichlorobenzene	5.0 µg/L
1,1 Dichloroethane	70 µg/L
1,2 Dichloroethane	5.0 µg/L
1,1 Dichloroethylene	3.2 µg/L
Ethylene Dibromide	0.05 µg/L

Methylene Chloride	4.6 µg/L
1,1,1 Trichloroethane	200 µg/L
1,1,2 Trichloroethane	5.0 µg/L
Trichloroethylene	5.0 µg/L
Tetrachloroethylene	3.3 µg/L
cis-1,2 Dichloroethylene	70 µg/L
Vinyl Chloride	2.0 µg/L
D. Non-Halogenated Semi-Volatile Organic Compounds	
Total Phthalates	190 µg/L
Diethylhexyl Phthalate	2.2 µg/L
Total Group I Polycyclic Aromatic Hydrocarbons[7]	1.0 µg/L
Benzo(a)anthracene[7]	0.0038 µg/L
Benzo(a)pyrene[7]	0.0038 µg/L
Benzo(b)fluoranthene[7]	0.0038 µg/L
Benzo(k)fluoranthene[7]	0.0038 µg/L
Chrysene[7]	0.0038 µg/L
Dibenzo(a,h)anthracene[7]	0.0038 µg/L
Indeno(1,2,3-cd)pyrene[7]	0.0038 µg/L
Total Group II Polycyclic Aromatic Hydrocarbons	100 µg/L
Naphthalene	20 µg/L
E. Halogenated Semi-Volatile Organic Compounds	
Total Polychlorinated Biphenyls[8]	0.000064 µg/L
Pentachlorophenol	1.0 µg/L
F. Fuels Parameters	
Total Petroleum Hydrocarbons	5.0 mg/L
Ethanol	Report mg/L
Methyl-tert-Butyl Ether	70 µg/L
tert-Butyl Alcohol	120 µg/L
tert-Amyl Methyl Ether	90 µg/L

Table 2 Notes:

[1] The following abbreviations are used in Table 2, above:
- [a] mg/L = milligrams per liter
- [b] µg/L = micrograms per liter

[2] The minimum level (ML) for analysis of ammonia must be less than or equal to 0.1 mg/L.

[3] The ML for analysis of chloride must be less than or equal to 230 mg/L.

[4] The limitation for this parameter is on the basis of total recoverable metal in the water column.

[5] The compliance level for total residual chlorine (TRC) is 50 µg/L. The ML for analysis of TRC must be less than or equal to 50 µg/L.

[6] The ML for analysis of total cyanide must be less than or equal to 5.0 µg/L.

[7] The compliance level for group I polycyclic aromatic hydrocarbons (PAHs) is 0.1 µg/L. The ML for for analysis of group I PAHs must be less than or equal to 0.1 µg/L.

[8] The compliance level for total polychlorinated biphenyls (PCBs) is 0.5 µg/L. The ML for analysis of total PCBs must be less than or equal to 0.5 µg/L.

Table 3: Effluent Flow Limitation[1]

Effluent Flow	**Effluent Limitation**
	1.0 MGD

Table 3 Notes

[1] The following abbreviations are used in Table 3, above:
[a] MGD = million gallons per day

Table 4: pH Limitations for Discharges in Massachusetts[1]

Receiving Water Class	**Effluent Limitation**
Freshwater	6.5 to 8.3 SU

Table 4 Notes

[1] The following abbreviations are used in Table 4, above:
[a] SU = standard units

Table 5: Temperature Limitations for Discharges in Massachusetts[1]

Receiving Water Class		**Effluent Limitation**	**ΔT Limitation**
Class B	Cold Water Fishery	68°F	≤3°F

Table 5 Notes

[1] The following abbreviations are used in Table 5, above:
[a] °F = degrees Fahrenheit
[b] ΔT = change in temperature
[c] ≤ = less than or equal to

Remediation General Permit Part 2.5.3:
Special Conditions for Pipeline and Tank Dewatering

In addition to meeting the BMP requirements for all discharges, discharges from pipeline and tank dewatering must meet the following requirements:

a. Discharges of tank bottom water are prohibited;
b. Pipeline(s), tank(s) or similar structures and appurtenances must be pre-cleaned to remove scale, solids, and residues unless these structures are used only for water storage;[14]
c. Water quality control measures must be implemented if potable water, groundwater or surface waters other than the receiving water will be discharged that prevent lower quality waters being transferred to higher quality waters;
d. Discharges of chemicals and/or additives used for tank or pipeline cleaning, repair or installation are prohibited unless in accordance with Part 2.5.3 of the RGP; and
e. Discharges of sludge generated in the dewatering of the pipelines or tanks is prohibited.

Remediation General Permit Part 4.4.1:
Monitoring Requirements for Discharges from Dewatering of Pipelines and Tanks

a. The operator must take a minimum of five (5) grab samples, including:
    i. For **influent**, the operator must take one (1) sample of the source water during the fill process, except when infeasible. A representative sample the source water may be used for influent if sampling during the fill process is infeasible;
    ii. For tanks, the operator shall take a minimum of one (1) **in-process** sample representative of the tank water following maintenance or testing, but before draining. If the tank contents are likely to undergo phase separation or stratification, multiple samples from multiple depths within the water column must be collected and composited. The operator shall analyze and review the in-process sample prior to discharge. If the analysis demonstrates that the tank water does not meet the effluent limitations in this general permit, the operator shall not discharge the tank water unless treatment reduces the pollutant levels below the effluent limitations established in this general permit;
    iii. For pipelines, the operator shall take one (1) **in-process** sample of the pipeline water following depressurization. The operator shall analyze and review the in-process sample prior to discharge. If the analysis demonstrates that the pipeline water does not meet the effluent limitations in this general permit, the operator shall not discharge the pipeline water unless treatment reduces the pollutant levels below the effluent limitations established in this general permit; and
    iv. For **effluent**, the operator must take one (1) sample of the discharge during the first 10% of discharge, one (1) sample of the discharge at the approximate midpoint of discharge, and one (1) sample of the discharge during the last 10% of discharge. If at any time the analysis demonstrates that the discharge does not meet the effluent limitations and requirements in this general permit, corrective action must be taken in accordance with Part 2.5.2.e, above prior to resuming discharge, unless instructed otherwise by EPA and/or the appropriate State.