NPDES Permit No. IL0078981 Notice No. BWC:14062701bwc.docx

Public Notice Beginning Date: November 6, 2014

Public Notice Ending Date: December 8, 2014

National Pollutant Discharge Elimination System (NPDES)
Permit Program

Draft New NPDES Permit to Discharge into Waters of the State

Public Notice/Fact Sheet Issued By:

Illinois Environmental Protection Agency Bureau of Water, Division of Water Pollution Control Permit Section 1021 North Grand Avenue East Post Office Box 19276 Springfield, Illinois 62794-9276 217/782-0610

Name and Address of Discharger:

Name and Address of Facility:

Enbridge Pipeline, LLC 3399 East Grand River, Suite 100 Howell, Michigan 48843 Enbridge Pipeline, LLC Manhattan Station 15637 West Bruns Road Manhattan, Illinois 60442 (Will County)

The Illinois Environmental Protection Agency (IEPA) has made a tentative determination to issue a NPDES permit to discharge into the waters of the state and has prepared a draft permit and associated fact sheet for the above named discharger. The Public Notice period will begin and end on the dates indicated in the heading of this Public Notice/Fact Sheet. The last day comments will be received will be on the Public Notice period ending date unless a commentor demonstrating the need for additional time requests an extension to this comment period and the request is granted by the IEPA. Interested persons are invited to submit written comments on the draft permit to the IEPA at the above address. Commentors shall provide his or her name and address and the nature of the issues proposed to be raised and the evidence proposed to be presented with regards to those issues. Commentors may include a request for public hearing. Persons submitting comments and/or requests for public hearing shall also send a copy of such comments or requests to the permit applicant. The NPDES permit and notice number(s) must appear on each comment page.

The application, engineer's review notes including load limit calculations, Public Notice/Fact Sheet, draft permit, comments received, and other documents are available for inspection and may be copied at the IEPA between 9:30 a.m. and 3:30 p.m. Monday through Friday when scheduled by the interested person.

If written comments or requests indicate a significant degree of public interest in the draft permit, the permitting authority may, at its discretion, hold a public hearing. Public notice will be given 45 days before any public hearing. Response to comments will be provided when the final permit is issued. For further information, please call Brian W. Cox at 217/782-0610.

The applicant operates a refined petroleum pipeline (SIC 4612). Wastewater will be generated from the hydrostatic testing of one new storage unit which has never contained any product and will generate a total of 21 million gallons of hydrostatic test water. Additionally, a segment of a repaired pipeline which contained natural gas diluent will also be tested which will generate approximately 2 MGD of hydrostatic test water. The hydrostatic test water will be discharged at an average rate of 4.9 MGD from Outfall 003.

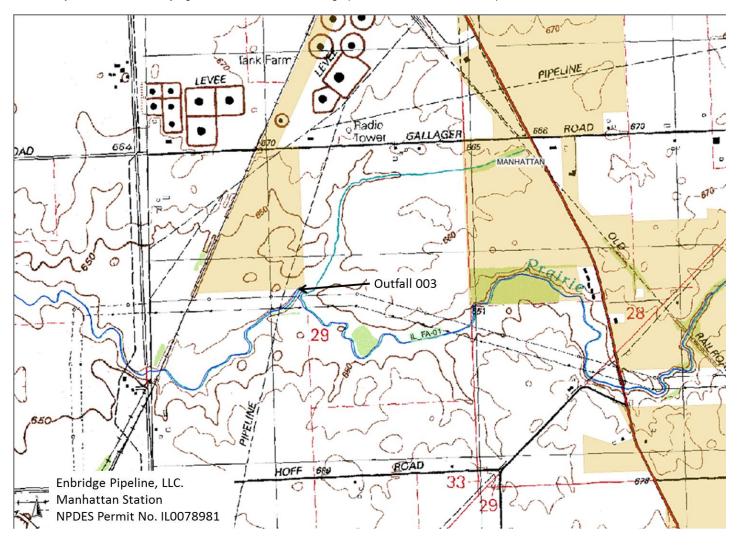
Similar hydrostatic testing discharges were previously permitted for this facility under NPDES Permit Number IL0078981 which was issued June 25, 2009 and terminated November 4, 2010.

Application is made for the new discharge which is located in Will County, Illinois. The following information identifies the discharge point, receiving stream and stream classifications:

Outfall	Receiving Stream	Latitude		Longitude		Stream Classification	Stream Integrity Rating
003	Prairie Creek	41° 24' 12"	North	87° 59' 28"	West	General Use	С

The stream segment, IL_FA-01, receiving the discharge from outfall(s) 003, is not on the 2014 303(d) list of impaired waters and is not considered a biologically significant stream on the 2008 Illinois Department of Natural Resources Publication – *Integrating Multiple Taxa in a Biological Stream Rating System.* The stream segment receiving the discharge from outfall 003 is also designated enhanced for dissolved oxygen in Title 35 Ill. Adm. Code § 302, Appendix D.

To assist you further in identifying the location of the discharge please see the attached map.



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The discharge(s) from the facility shall be monitored and limited at all times as follows:

Outfalls: 003 Hydrostatic Test Water (DAF = 4.9 MGD)

	LOAD LIMITS lbs/day DAF (DMF)			CONCENT LIMITS		
PARAMETER	30 DAY AVERAGE	DAILY MAXIMUM	REGULATION	30 DAY AVERAGE	DAILY MAXIMUM	REGULATION
Flow (MGD)						
pH						35 IAC 302.204
Total Suspended Solids				15	30	35 IAC 304.124
Oil and Grease				15	30	35 IAC 304.124
Iron				2	4	35 IAC 304.124
Total Residual Chlorine					0.05	35 IAC 302.208
Dissolved Oxygen						35 IAC 302.206*

^{*}During the period of March thru July, dissolved oxygen (DO) shall not be less than 5.0 mg/L at any time and 6.25 mg/L as a daily mean averaged over 7 days. During the period of August thru February DO shall not be less than 4.0 mg/L at any time, 4.5 mg/L as a daily mean averaged over 7 days and 6.0 mg/L as a daily mean averaged over 30 days.

The following explain the conditions of the proposed permit:

The special conditions clarify flow monitoring requirements, pH limitations, TRC limitations and monitoring requirements, monitoring location requirements, discharge monitoring report (DMR) submission requirements, dissolved oxygen limitations, prohibition of offensive conditions, soil erosion protection requirements, reopener conditions, and field office notification requirements.

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Antidegradation Assessment for Enbridge Pipelines – Manhattan Station NPDES Permit No. IL0078981 Will County

The subject facility has applied for an NPDES permit for the discharge of hydrostatic test water. The hydrostatic test water will be generated from the installation of one new storage tank which has never contained any product and from a repaired section of a pipeline used to transport diluent (natural gas). The tank will generate a total of 21 million gallons of hydrostatic test water and the repaired segment of the diluent pipeline will generate approximately 2 million gallons of hydrostatic test water. Prior to operation, the storage tank and the repaired section of pipeline are hydrostatically tested for structural integrity to ensure that they will not leak. The source of the water used to conduct these tests will be obtained from the Village of Manhattan's municipal water supply. Prior to conducting the hydrostatic test on the repaired segment of the diluent pipeline, the pipe will be thoroughly cleaned to remove any residual product. An energy dissipating structure will be used at the outfall to prevent erosion. The hydrostatic test water will be discharged to Prairie Creek at an average flow rate of 4.9 MGD. In the event that a failure of the test is discovered through the initial testing, follow-up tests will be required after the leak is repaired. The requested appropriation and discharge amounts include these follow-up tests that may not be required. Similar hydrostatic testing discharges were previously permitted for this facility under NPDES Permit Number IL0078981 which was issued June 25, 2009 and terminated November 4, 2010. The antidegradation assessment was public noticed May 13, 2009 for the hydrostatic testing associated with the permit issued June 25, 2009 and allowed the discharge of 1.2 MGD of hydrostatic test water to Prairie Creek, in addition to other hydrostatic testing discharges.

Identification and Characterization of the Affected Water Body.

Segment FA-01 of Prairie Creek is a General Use water body with zero 7Q10 flow existing upstream. This stream segment is not listed on the Agency's 2014 Section 303(d) List of impaired water bodies. This section of the stream has been assessed as fully supporting aquatic life uses. Prairie Creek is not listed as a biologically significant stream in the 2008 Illinois Department of Natural Resources Publication Integrating Multiple Taxa in a Biological Stream Rating System, but is given an integrity rating of C at the location of the hydrostatic test water discharge. Prairie Creek is designated as enhanced water pursuant to the dissolved oxygen water quality standard.

Identification of Proposed Pollutant Load Increases or Potential Impacts on Uses.

The steel pipe and storage tanks may contain iron filings and cutting oil. The amount picked up in the hydrostatic test water will be minimal. Any residual natural gasoline from the repaired segment of pipeline should be minimized by cleaning the pipeline prior to the testing. It is not expected that any natural gasoline will be present in the hydrostatic discharge. No impacts on designated uses of the water bodies are anticipated due to the nature of these materials and the small amounts present. The water source is municipal, therefore chlorine may be present. However, dechlorination may be performed as necessary if measurable residuals are present in discharged water.

Fate and Effect of Parameters Proposed for Increased Loading.

Iron will remain in the stream continuum unless it becomes part of the bed sediments. Iron is a common natural component of bed sediments and the effect will be imperceptible. The oil will volatilize or be broken down by natural processes. Quantities involved are small and oil will not be visible.

Purpose and Anticipated Benefits of the Proposed Activity.

Hydrostatic testing of pipelines is a public and environmental safety procedure.

Assessments of Alternatives for Less Increase in Loading or Minimal Environmental Degradation.

The US Department of Transportation requires that pipelines be hydrostatically tested before being placed in use. The discharges from the hydrostatic tests will be temporary and intermittent.

Alternatives to the proposed discharge of the hydrostatic test water are not reasonable. The water could be hauled from the site by trucks to a Publically Owned Treatment Works (POTW). This would not only be expensive, but is also wasteful of the treatment capacity and function of the POTW in that very clean water would be passed through the plant. Likewise, no sanitary sewer line was in close proximity to the proposed pipeline route such that the water could be transported to the POTW in that manner and again, a POTW would not want clean water that would waste resources at the plant. Spray irrigation on farm fields was also rejected because testing would potentially occur at any time of year and tests occurring outside of the irrigation window would have to be stored, which would be difficult in terms of procuring equipment to store such a large quantity of water, given the temporary nature of the discharge.

Summary Comments of the Illinois Department of Natural Resources, Regional Planning Commissions, Zoning Boards or Other Entities

The Illinois Department of Natural Resources was consulted regarding threatened and endangered species issues via the EcoCAT system on October 01, 2013. The only protected resource identified was the Franklin's Ground Squirrel (*Spermophilus franklini*). However, no aquatic endangered species were indicated from Prairie Creek. IDNR terminated consultation in a letter dated October 02, 2013.

Agency Conclusion.

This preliminary assessment was conducted pursuant to the Illinois Pollution Control Board regulation for Antidegradation found at 35 Ill. Adm. Code 302.105 (antidegradation standard) and was based on the information available to the Agency at the time the draft permit was written. We tentatively find that the proposed activity will result in the attainment of water quality standards; that all existing uses of the receiving stream will be maintained; that all technically and economically reasonable measures to avoid or minimize the extent of the proposed increase in pollutant loading have been incorporated into the proposed activity; and that this activity will benefit the community at large by providing for safety testing of a petroleum product pipeline. Comments received during the NPDES permit public notice period will be evaluated before a final decision is made by the Agency.

NPDES Permit No. IL0078981

Illinois Environmental Protection Agency

Division of Water Pollution Control

1021 North Grand Avenue East

Post Office Box 19276

Springfield, Illinois 62794-9276

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

New (NPDES) Permit

Expiration Date: Issue Date: Effective Date:

Name and Address of Permittee: Facility Name and Address:

Enbridge Pipeline, LLC
3399 East Grand River, Suite 100
Howell, Michigan 48843
Enbridge Pipeline, LLC
Manhattan Station
15637 West Bruns Road
Manhattan, Illinois 60442

(Will County)

Discharge Number and Name: Receiving Waters:

003 Hydrostatic Test Water Prairie Creek

In compliance with the provisions of the Illinois Environmental Protection Act, Title 35 of Ill. Adm. Code, Subtitle C and/or Subtitle D, Chapter 1, and the Clean Water Act (CWA), the above-named permittee is hereby authorized to discharge at the above location to the above-named receiving stream in accordance with the standard conditions and attachments herein.

Permittee is not authorized to discharge after the above expiration date. In order to receive authorization to discharge beyond the expiration date, the permittee shall submit the proper application as required by the Illinois Environmental Protection Agency (IEPA) not later than 180 days prior to the expiration date.

Alan Keller, P.E. Manager, Permit Section Division of Water Pollution Control

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Effluent Limitations and Monitoring

1. From the effective date of this permit until the expiration date, the effluent of the following discharge(s) shall be monitored and limited at all times as follows:

Outfalls: 003 Hydrostatic Test Water (DAF = 4.9 MGD)

	LOAD LIMITS lbs/day <u>DAF (DMF)</u>		CONCEN' LIMITS			
PARAMETER	30 DAY AVERAGE	DAILY MAXIMUM	30 DAY AVERAGE	DAILY MAXIMUM	SAMPLE FREQUENCY	SAMPLE TYPE
Flow (MGD)	See Special Condition 1				Daily When Discharging	Measurement
рН	See Special Condition 2				Daily When Discharging	Grab
Total Suspended Solids			15	30	Daily When Discharging	Grab
Oil and Grease			15	30	Daily When Discharging	Grab
Iron			2	4	Daily When Discharging	Grab
Total Residual Chlorine*				0.05*	Daily When Discharging	Grab
Dissolved Oxygen	See Special Co	ndition 12			Daily When Discharging	Grab

^{*} See Special Condition 11.

Special Conditions

<u>SPECIAL CONDITION 1</u>. Flow shall be measured in units of Million Gallons per Day (MGD) and reported as a monthly average and a daily maximum on the Discharge Monitoring Report. The monthly average shall consist of the summation of the daily flows divided by the number of days the facility discharged during that month.

<u>SPECIAL CONDITION 2</u>. The pH shall be in the range 6.5 to 9.0. The monthly minimum and monthly maximum values shall be reported on the DMR form.

<u>SPECIAL CONDITION 3</u>. Samples taken in compliance with the effluent monitoring requirements shall be taken at a point representative of the discharge, but prior to entry into the receiving stream.

<u>SPECIAL CONDITION 4</u>. The Permittee shall record monitoring results on Discharge Monitoring Report (DMR) Forms using one such form for each outfall each month.

In the event that an outfall does not discharge during a monthly reporting period, the DMR Form shall be submitted with no discharge indicated.

The Permittee may choose to submit electronic DMRs (NetDMRs) instead of mailing paper DMRs to the IEPA. More information, including registration information for the NetDMR program, can be obtained on the IEPA website, http://www.epa.state.il.us/water/net-dmr/index.html.

The completed Discharge Monitoring Report forms shall be submitted to IEPA no later than the 15th day of the following month, unless otherwise specified by the permitting authority.

Permittees not using eDMRs shall mail Discharge Monitoring Reports with an original signature to the IEPA at the following address:

Illinois Environmental Protection Agency Division of Water Pollution Control 1021 North Grand Avenue East Post Office Box 19276 Springfield, Illinois 62794-9276

Attention: Compliance Assurance Section, Mail Code # 19

<u>SPECIAL CONDITION 5</u>. If an applicable effluent standard or limitation is promulgated under Sections 301(b)(2)(C) and (D), 304(b)(2), and 307(a)(2) of the Clean Water Act and that effluent standard or limitation is more stringent than any effluent limitation in the permit or controls a pollutant not limited in the NPDES Permit, the Agency shall revise or modify the permit in accordance with the more stringent standard or prohibition and shall so notify the permittee.

<u>SPECIAL CONDITION 6</u>. The permittee shall provide telephone notification to the Des Plaines IEPA Regional Office, at 847/294-4000, at least 24 hours prior to any hydrostatic pipeline testing which may result in a discharge.

<u>SPECIAL CONDITION 7</u>. No effluent shall contain settleable solids, floating debris, visible oil, grease, scum, or sludge solids. Color (including color resulting from dyes or tracers in the hydrostatic test water), odor and turbidity must be reduced to below obvious levels.

<u>SPECIAL CONDITION 8</u>. The effluent, alone or in combination with other sources, shall not cause a violation of any applicable water quality standard outlined in 35 III. Adm. Code 302.

<u>SPECIAL CONDITION 9</u>. Appropriate measures shall be taken to prevent water quality impacts resulting from soil erosion due to the discharge. The discharge flow rate shall be controlled so as not to cause scouring or other damage to stream beds or banks.

<u>SPECIAL CONDITION 10.</u> Solid waste such as straw used for filtering or erosion control shall be disposed of in accordance with state and federal law.

<u>SPECIAL CONDITION 11</u>. All samples for Total Residual Chlorine shall be analyzed by an applicable method contained in 40 CFR 136, equivalent in accuracy to low-level amperometric titration. Any analytical variability of the method used shall be considered when determining the accuracy and precision of the results obtained. For the purpose of this permit Total Residual Chlorine means those substances which include combined and uncombined forms of both chlorine and bromine and which are expressed, by convention, as an equivalent concentration of molecular chlorine.

The water quality standard for TRC (0.011 mg/l 30-day average and 0.019 mg/l daily max) is below the method detection level (0.05 mg/l) as described in 40 CFR 136. Therefore, for the purpose of this permit, the method detection level will be utilized to determine compliance with the permit limit for TRC. A measurement of <0.05 mg/l reported on the DMR shall not be considered a violation of the water quality based effluent limit. This reporting threshold is being established to determine compliance and does not authorize the discharge of TRC in excess of the water quality based effluent limit.

SPECIAL CONDITION 12. During the period of March thru July, dissolved oxygen (DO) shall not be less than 5.0 mg/L at any time and

Special Conditions

6.25 mg/L as a daily mean averaged over 7 days. During the period of August thru February DO shall not be less than 4.0 mg/L at any time, 4.5 mg/L as a daily mean averaged over 7 days and 6.0 mg/L as a daily mean averaged over 30 days.

<u>SPECIAL CONDITION 13.</u> All tanks, pipelines and appurtenances must be thoroughly cleaned and free of product residuals prior to hydrostatic testing activities. This requirement does not apply to newly constructed tanks or pipelines. Cleaning waters are not authorized to be discharged by this permit and must be disposed of at a site and in a manner acceptable to the Agency.