NPDES Permit No. IL0080089
Notice No. MEL:15120301.docx

Public Notice Beginning Date: **January 8, 2016**

Public Notice Ending Date: **February 8, 2016**

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:

Energy Transfer Crude Oil Company
1300 Main St.
Houston, Texas 77002

Name and Address of Facility:

100-2 Conversion Project
Multiple Locations
(Massac, Johnson, and Wayne Counties)

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 Mark E. Liska at 217/782-0610.

The applicant is engaged in the transmission and storage of natural gas (SIC 4922). Waste water is generated from hydrostatic testing of new natural gas transmission lines. Testing activities will result in an average discharge of 12.0 MGD of hydrostatic test water from outfall 001, 6.5 MGD of hydrostatic test water from outfall 002, and 15.0 MGD of hydrostatic test water from outfall 003.

Application is made for new discharges which are located in Massac, Johnson, and Wayne counties, Illinois. The following information identifies the discharge point, receiving stream and stream classifications:

Outfall	Receiving Stream	Latitude		Longitude		Stream Classification	Biological Stream Characterization
001	Ohio River	37° 12' 45"	North	88° 52' 15"	West	General Use	Not Rated
002	Lake of Egypt	37° 35' 30"	North	88° 52' 45"	West	General Use	Not Rated
003	Skillet Fork River	38° 21' 60"	North	88° 36' 15"	West	General Use	B

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

The stream segment A-920-981 receiving the discharge from outfall 001 is on the draft 2014 Illinois Integrated Water Quality Report and Section 303(d) List. The receiving water has not been listed as biologically significant in the 2008 Illinois Department of Natural Resources publication *Integrating Multiple Taxa in a Biological Stream Rating System*. The segment is designated as an enhanced water pursuant to the dissolved oxygen water quality standard at this location.

The following parameters have been identified as the pollutants causing impairment:

Designated Use	Potential Cause
Fish Consumption	Mercury, Dioxin, PCBs
Primary Contact	Fecal Coliform

The stream segment RAL receiving the discharge from outfall 002 is on the draft 2014 Illinois Integrated Water Quality Report and Section 303(d) List. The receiving water has not been listed as biologically significant in the 2008 Illinois Department of Natural Resources publication *Integrating Multiple Taxa in a Biological Stream Rating System*. The segment is not designated as an enhanced water pursuant to the dissolved oxygen water quality standard at this location.

The following parameters have been identified as the pollutants causing impairment:

Designated Use	Potential Cause
Fish Consumption	PCBs

The stream segment CA-05 receiving the discharge from outfall 003 is on the draft 2014 Illinois Integrated Water Quality Report and Section 303(d) List. The receiving water has not been listed as biologically significant in the 2008 Illinois Department of Natural Resources publication *Integrating Multiple Taxa in a Biological Stream Rating System*. The segment is not designated as an enhanced water pursuant to the dissolved oxygen water quality standard at this location.

The following parameters have been identified as the pollutants causing impairment:

Designated Use	Potential Cause
Fish Consumption	Mercury, PCBs
Aquatic Life	Iron, Dissolved Solids, Terbufos, Total Suspended Solids
Public Water Supply	Atrazine, Iron, Total Dissolved Solids
Primary Contact	Fecal Coliform

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

Outfall(s): 001 Hydrostatic Test Water (DAF = 12.0 MGD)
002 Hydrostatic Test Water (DAF = 6.5 MGD)
003 Hydrostatic Test Water (DAF = 15.0 MGD)

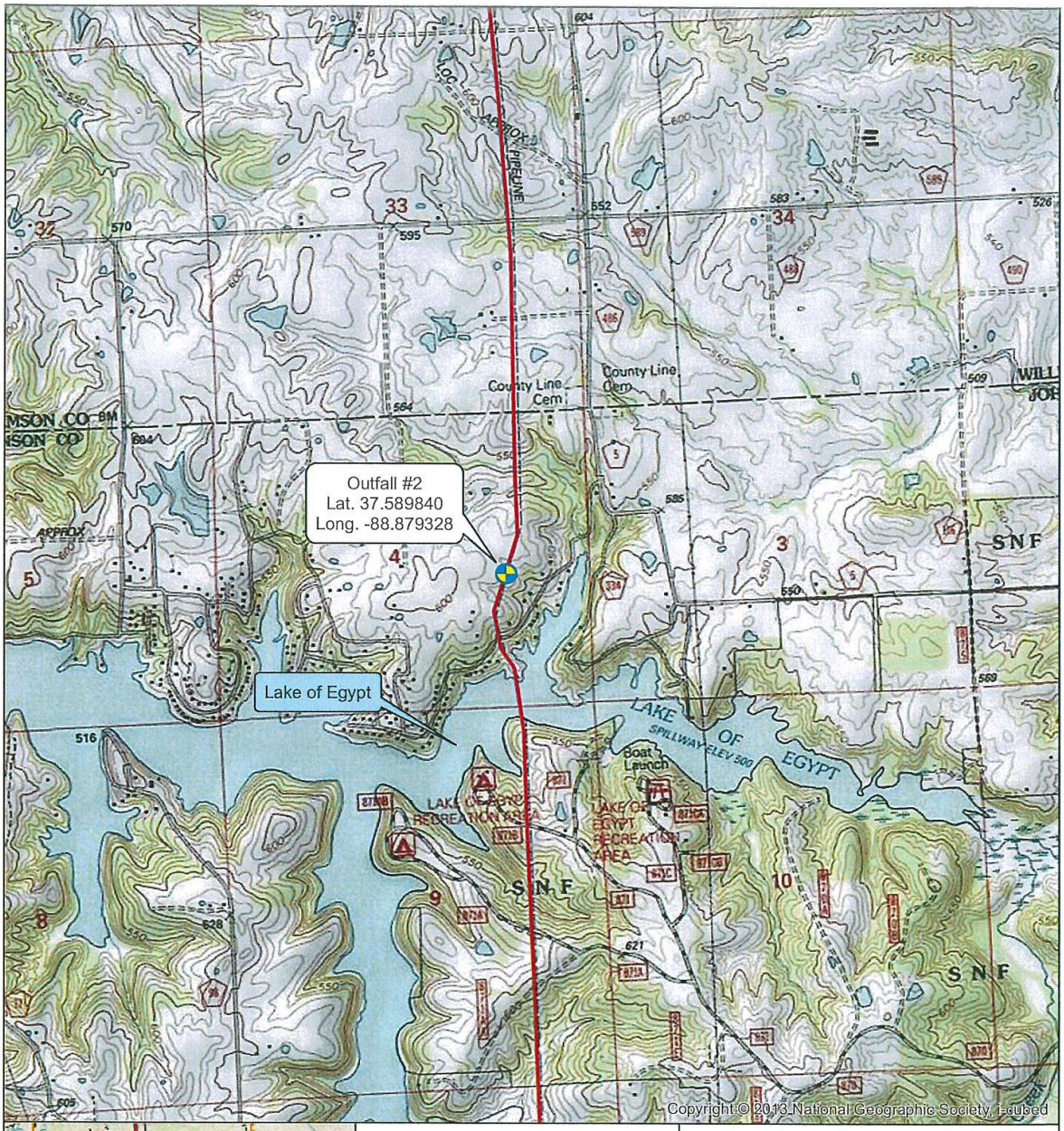
IAC = Illinois Administrative Code

	LOAD LIMITS lbs/day DAF (DMF)			CONCENTRATION LIMITS mg/l		
PARAMETER	30 DAY AVERAGE	DAILY MAXIMUM	REGULATION	30 DAY AVERAGE	DAILY MAXIMUM	REGULATION
Flow (MGD)						
pH	Shall be within the range of 6.5 to 9.0 standard units					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

The following explain the conditions of the proposed permit:

The special conditions clarify flow monitoring, pH limits, monitoring locations, DMR submission requirements, withdrawal of source water, and various other discharge requirements.


Outfall #1
Lat. 37.211240
Long. -88.869109
Ohio River
Maple Grove Sch
Radio Tower
Pumping Station
Settling Pond
Settling Pond
Substa
Powerplant
Conveyors
Settling Pond
Joppa
High Sch
Light
Mile 952
MASSAC CO
MC CRACKEN CO
Newtons Creek
Crutcher Creek
BR 315
BR 362
BR 936
PACIFIC
Cem
Copyright:© 2013 National Geographic Society, i-cubed
MASSAC CO
BALLARD CO
CRITTENDEN CO
USGS The National Map:
National Boundaries Dataset,
3D Elevation Program,
Geographic Names
Legend
Proposed Discharge Location
Existing Pipeline
0 1,000 2,000
Feet
ENERGY TRANSFER CRUDE OIL COMPANY, LLC
Energy Transfer Crude Oil Company, LLC
Trunkline 100-2 Pipeline Conversion Project
Hydrostatic Test - Outfall #1
Massac County, Illinois
Page 1 of 3
1:24,000
NAD 83 UTM 15 North
Date: Nov 2015
Path: P:\GIS\Client\ETC_EnergyTransfer\Trunkline\NDyersHydrotest\MAPS\ENV\Hydro\Mods\OutFall1.mxd


Outfall #2
Lat. 37.589840
Long. -88.879328
Lake of Egypt
County Line Cem
LAKE OF EGYPT
Boat Launch
LAKE OF EGYPT RECREATION AREA
S N F
Copyright © 2013 National Geographic Society, i-cubed
Herrin
WILLIAMSON CO
Marion
SALINE
Shawnee National Forest
JOHNSON CO
USGS The National Map: National Boundaries Dataset, 3D Elevation Program, Geographic Names
Legend
Proposed Discharge Location
Existing Pipeline
0 1,000 2,000 Feet
ENERGY TRANSFER CRUDE OIL COMPANY, LLC
Energy Transfer Crude Oil Company, LLC
Trunkline 100-2 Pipeline Conversion Project
Hydrostatic Test - Outfall #2
Johnson County, Illinois
Page 2 of 3
1:24,000
NAD 83 UTM 15 North
Date: Nov 2015
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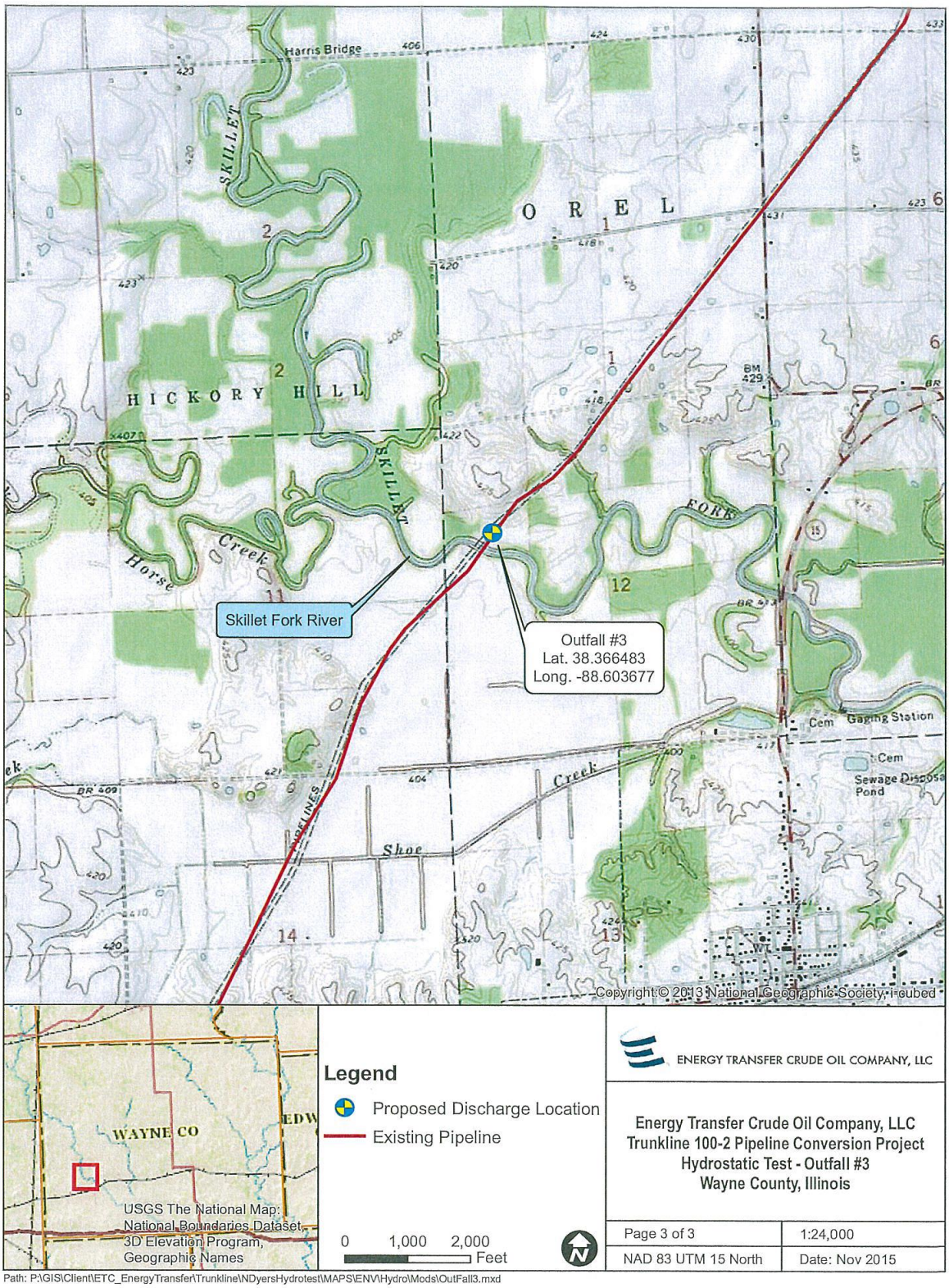
Harris Bridge
SKILLET
O R E L
HICKORY HILL
Horse Creek
SKILLET FORK
Skillet Fork River
Outfall #3
Lat. 38.366483
Long. -88.603677
Gaging Station
Cem
Sewage Disposal Pond
Shoe Creek
PIPELINES
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WAYNE CO
EDW
USGS The National Map: National Boundaries Dataset, 3D Elevation Program, Geographic Names
Legend
Proposed Discharge Location
Existing Pipeline
0 1,000 2,000 Feet
ENERGY TRANSFER CRUDE OIL COMPANY, LLC
Energy Transfer Crude Oil Company, LLC
Trunkline 100-2 Pipeline Conversion Project
Hydrostatic Test - Outfall #3
Wayne County, Illinois
Page 3 of 3
1:24,000
NAD 83 UTM 15 North
Date: Nov 2015
Path: P:\GIS\Client\ETC_EnergyTransfer\Trunkline\NDyersHydrotest\MAPS\ENV\Hydro\Mods\OutFall3.mxd

Antidegradation Assessment for Energy Transfer Crude Oil Trunkline
NPDES Permit No. IL0080089 Massac, Johnson and Wayne Counties

The subject facility has applied for an NPDES permit for the hydrostatic testing of existing segments of a 30 inch diameter natural gas pipeline. The pipeline is to be converted to a crude oil pipeline. Hydrostatic tests must be performed according to federal regulations. There will be two or three discharge locations, depending on the effectiveness of the initial test. Outfall 002, at Lake of Egypt, may not be utilized. Approximately 105 miles of pipeline will be tested. Outfall number, source water, receiving water body and volume of flow are given below. All discharges will be filtered through hay bales to disperse energy and prevent erosion. Duration of discharge will be from two to four days. Maximum discharge rate will be 2,500 gallons per minute. All waters used will be taken from the water body that will receive the discharged effluent after the test.

Identification and Characterization of the Affected Water Body.

Outfall 001 will be a discharge of Ohio River sourced test water back to the Ohio River at a total test volume of 12 MG discharged over a period of 3.5 days. The Ohio River (segment code A-920-981) has a 7Q10 flow of 53,820 cfs and is a General Use water. The Ohio River is listed on the draft 2014 Illinois Integrated Water Quality Report and Section 303(d) List as impaired for fish consumption and primary contact uses. Causes of fish consumption use impairment are mercury, dioxin and PCBs. The cause of primary contact use impairment is fecal coliform bacteria. Aquatic life and public and food processing water supply uses are fully supported. The Ohio River 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*, nor is it given an integrity rating in that publication for this location. The Ohio River is designated as an enhanced water pursuant to the dissolved oxygen water quality standard at this location.

Outfall 002 will be a discharge of Lake of Egypt sourced test water back to Lake of Egypt at a total test volume of 6.5 MG discharged over a period of 2 days. Lake of Egypt (segment code RAL) has a 7Q10 flow of zero cfs and is a General Use water. Lake of Egypt is listed on the draft 2014 Illinois Integrated Water Quality Report and Section 303(d) List as impaired for fish consumption use. The causes of this use impairment are mercury and PCBs. Aquatic life, public and food processing water supply and aesthetic quality uses are fully supported. Lake of Egypt 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*, nor is it given an integrity rating in that publication. Lake of Egypt is not designated as an enhanced water pursuant to the dissolved oxygen water quality standard.

Outfall 003 will be a discharge of Skillet Fork sourced test water back to the Skillet Fork at a total test volume of 15 MG discharged over a period of 4 days. Skillet Fork (segment code CA-05) has a 7Q10 flow of 0.03 cfs and is a General Use water. Skillet Fork is listed on the draft 2014 Illinois Integrated Water Quality Report and Section 303(d) List as impaired for fish consumption, aquatic life, public water supply and primary contact uses. Causes of fish consumption use impairment are mercury and PCBs. Causes of aquatic life use impairment are iron, dissolved oxygen, terbufos and total suspended solids. Causes of public and food processing water supply use impairment are atrazine, iron and total dissolved solids. Cause of primary contact use impairment is fecal coliform bacteria. Skillet Fork 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*, however, it is given an integrity rating of "B" in that publication for this location. Skillet Fork is not designated as an enhanced water pursuant to the dissolved oxygen water quality standard at this location.

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

Parameters that will increase in loading are associated with residual materials in the pipeline. Total suspended solids, oil and grease, and iron may be suspended in the test water originating from the inside of the pipe, valves and fittings of the pipeline. Given the past natural gas nature of the pipeline, these additions to the test water are anticipated to be minimal. The existing pipeline has been observed with a pig televised system and no contaminant deposits were found. No adverse impacts to the water bodies are anticipated from the hydrostatic tests.

Fate and Effect of Parameters Proposed for Increased Loading.

The iron and total suspended solids discharged will be regulated by the state effluent standards and will become part of the bed sediment of the receiving waters. Oil and grease will also be regulated with the state effluent standard and therefore no visible remnant may be discharged. No adverse effects are anticipated in the receiving waters.

Purpose and Social & Economic Benefits of the Proposed Activity.

It is vitally important that pipelines be hydrostatically tested to ensure the safety of nearby communities and the environment. Regulations require this testing.

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

The pipeline owner has chosen responsible methods of hydrostatic testing. Waters used in the testing are taken from the receiving stream. Therefore, no possibility exists to spread invasive species during the testing. Erosion control measures will be applied at the points of discharge. This includes straw bales placed in such a way as to disperse energy and filter particles and if necessary, fabric placement to control erosion.

The hydrostatic test methods chosen are the accepted norm for these projects. Hydrostatic testing is a very short-term activity. The

discharges will last only two to four days. Arranging for effluents to be land applied, sent to a POTW or other alternatives are not practical for this type of discharge. Discharging the effluents to local surface waters in a responsible manner has been developed as the proper method of dealing with the water needed for the testing.

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 for each discharge location via the EcoCAT system on November 23, 2015. The Skillet Fork and Lake of Egypt locations had no endangered or threatened species present and consultation was immediately terminated. Endangered or threatened species were initially identified in the general area of the Ohio River discharge. Termination of consultation for this outfall was provided in a letter from IDNR dated November 24, 2015 citing the lack of likely adverse impacts.

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 waters 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 communities at large by ensuring the safety of the 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. IL0080089

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:

Energy Transfer Crude Oil Company
1300 Main St.
Houston, Texas 77002

Facility Name and Address:

100-2 Conversion Project
Multiple Locations
(Massac, Johnson, and Wayne Counties)

Discharge Number and Name:

001 Hydrostatic Test Water
002 Hydrostatic Test Water
003 Hydrostatic Test Water

Receiving Waters:

Ohio River
Lake of Egypt
Skillet Fork

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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NPDES Permit No. IL0080089

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:

Outfall(s): 001 Hydrostatic Test Water (DAF = 12.0 MGD)
002 Hydrostatic Test Water (DAF = 6.5 MGD)
003 Hydrostatic Test Water (DAF = 15.0 MGD)

	LOAD LIMITS lbs/day DAF (DMF)		CONCENTRATION LIMITS mg/l			
PARAMETER	30 DAY AVERAGE	DAILY MAXIMUM	30 DAY AVERAGE	DAILY MAXIMUM	SAMPLE FREQUENCY	SAMPLE TYPE
Flow (MGD)	See Special Condition 1				Daily When Discharging	
pH	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

NPDES Permit No. IL0080089

Special Conditions

SPECIAL CONDITION 1. Flow shall be measured in units of Million Gallons per Day (MGD) and reported as a monthly average and a daily maximum value on the monthly Discharge Monitoring Report.

SPECIAL CONDITION 2. 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.

SPECIAL CONDITION 3. 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.

SPECIAL CONDITION 4. 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

SPECIAL CONDITION 5. 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.

SPECAIL CONDITION 6. In addition to other requirements of this permit, 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.

SPECIAL CONDITION 7. The permittee shall provide telephone notification to the IEPA Marion Office at (618) 993-7200, at least 24 hours prior to any hydrostatic pipeline testing which may result in a discharge.

SPECIAL CONDITION 8. 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.

SPECIAL CONDITION 9. Solid wastes such as straw used for filtering or erosion control shall be disposed of in accordance with state and federal law.

SPECIAL CONDITION 10. The permittee shall only discharge hydrostatic test water to the watersheds from which it was withdrawn.

SPECIAL CONDITION 11. When test water is discharged to the same waterbody from which it was withdrawn, compliance with the numerical effluent standards is not required when effluent concentrations in excess of the standards result entirely from influent contamination, evaporation, and/or the incidental addition of traces of materials not utilized or produced in the hydrostatic test activity that is the source of the waste.