

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
BUREAU OF AIR

January 2001

Responsiveness Summary  
on Proposed Issuance of a  
State Construction and Lifetime Operating Permit to  
TEPPCO, Creal Springs

Facility Identification No.: 199855AAA  
Application No.: 00070065

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## **ILLINOIS EPA DECISION**

Following review of comments received during the public comment period and final review of the application, the Illinois EPA has determined that TEPPCO's application for an air permit meets the standards set for in state law and regulation. Accordingly, on January 8, 2001, the Illinois Environmental Protection Agency (Illinois EPA) issued a state construction and lifetime operating permit to TEPPCO for a tank farm near Creal Springs.

## **PERMIT PROCESS**

TEPPCO submitted an application for an air pollution control construction and lifetime operating permit for a petroleum products storage tank farm to be built near Creal Springs, Illinois. The proposed project is not considered a major source because the permitted emissions of pollutants from the facility would be less than major source thresholds.

The Illinois EPA Bureau of Air processes applications for permits for sources of emissions to the atmosphere. An air permit application must appropriately address compliance with applicable air pollution control laws and regulations before a permit can be issued. Following its initial technical review of TEPPCO's application, the Bureau of Air made a preliminary determination that the application met the standards for issuance of a state construction and lifetime operating permit and prepared a draft permit for public review and comment. The company was eligible to apply for the lifetime operating permit because its potential emissions will be well below the major source thresholds.

## **COMMENT PERIOD AND PUBLIC HEARING**

The public comment period began on October 14, 2000, with the publication of a notice in the Southern Illinoisan. Notices were also published in this paper on October 21 and 28. A public hearing was held on Wednesday, November 29, 2000, at the Creal Springs Elementary School to receive oral comments and answer questions regarding the application and draft air permit. The comment period remained open until December 29, 2000 to receive written comments.

## **QUESTIONS AND COMMENTS**

The following questions and comments are divided into three sections. The first section are questions and comments that the Illinois EPA received that relate to the Bureau of Air decision on the tank farm draft permit. The second section are comments and questions that do not relate to the Bureau of Air decision but that the Illinois EPA may have some jurisdiction over, such as water discharges. The third section is questions and comments concerning issues that the Illinois EPA has no expertise or authority over, such as the business structure of the company.

## **Questions and Comments Relating to the BOA Proceeding**

### **1. If TEPPCO does not receive the permit, what is their appeal process?**

If the Illinois EPA was to deny the permit and TEPPCO did not believe that the denial had a basis in the environmental laws, they could appeal the decision to the Illinois Pollution Control Board.

### **2. Should this permit be granted, what is the appeal process for those of us who are opposed to this operation?**

Under the laws governing state construction and operating permits there is no appeal process for third parties opposed to the proposal. Once the facility is built, outside parties can initiate litigation or petition the Attorney General to initiate litigation if there are violations of the permit or environmental law.

### **3. If the facility is state-of-the-art, why should it pollute at all?**

Air emissions are inherent in this type of facility. There are federal New Source Performance Standards (NSPS) that the facility must meet. The NSPS is a standard set by the United States EPA to ensure that the facility have good control of emissions. The NSPS requires design features to limit emissions from the tanks.

### **4. What will be the capacity of the tank farm?**

The facility will have the capacity to store approximately 100 million gallons of petroleum products as specified in the permit.

### **5. What monitoring will be required to measure the amount of hydrocarbons released from the tanks?**

Emissions from the tanks are calculated based on the throughput of petroleum products. The USEPA has developed emission factors for tanks. These emissions factors are used in combination with the throughput of the facility to determine the amount of emissions from the source. Monitoring technology is not available for storage tanks. USEPA's emission factors are adequate to determine emissions.

### **6. If the facility exceeds its permitted limitations, what will result? Will the pipeline and tank farm be fined or shut down until they are in compliance?**

If there is a numerical violation of a permit, the Illinois EPA takes steps to assure that the problem is corrected. The Illinois EPA would set up a compliance schedule, exact appropriate fines for the non-compliance, and take steps to bring a company into compliance. Many times such exceedances are followed by a consent decree and severe fines are associated with such consent decrees. To shut a facility down, there must be a clear threat to public health from the continuing operation of the facility.

**7. Some firms would rather pay fines and continue to violate their permit. Is this possible in Illinois?**

If a company is in violation of its permit, the Illinois EPA generally seeks fines that penalize the company over and above any economic benefit that the company may have received from operating in violation. In this way it is not an economic boon for the company to operate out of compliance.

**8. If odors were detected, wouldn't this indicate that toxins are being inhaled?**

The permit would allow up to 84 tons per year of volatile organic compounds (VOC), less than six tons per year are toxic in nature. The actual VOC emissions from the company should be less than 84 tpy and correspondingly less toxics will be emitted. The facility should not be a source of odor. If persistent or repeated odors are detected, please contact the Illinois EPA's regional office at 618/993-7200 and an inspector will be sent out to check the complaint.

**9. It is in the authority of the Illinois EPA to set standards more stringent than the USEPA regulations. I am formally requesting that Centennial be restricted to an emission limit of ten tons annually.**

The Illinois Environmental Protection Agency does not set the environmental standards for the State of Illinois. The Illinois General Assembly passes laws and the Illinois Pollution Control Board promulgates regulations based on those laws. The Illinois EPA enforces the laws and regulations. The Illinois EPA cannot arbitrarily lower the standards.

The Illinois EPA has used the federal New Source Performance Standards in permitting this source. The NSPS are federal standards set by the USEPA. Tank emissions were calculated using the USEPA TANKS Program and the USEPA Reference Document AP-42 Section 7.1 which are the standard for tank emission estimating throughout the U.S. Once the facility is built, it will be checked to make sure it was built according to the representations in the application.

**10. I request that inspections are to be performed unannounced.**

The Illinois EPA performs both announced and unannounced inspections depending on what is to be accomplished in the inspection. Unannounced inspections would occur if the Illinois EPA had reason to believe that there was a problem at the facility that the company may be trying to hide. The Illinois EPA frequently announces inspections to the company because the Agency wants to review paperwork, meet with company environmental staff and wants to make sure that people and records are readily accessible when the Agency arrives for the inspection.

**11. This project is a connected action with the conversion of a 50-year-old pipeline to carry liquid petroleum products from the Gulf Coast to central Illinois and the eastern United States. We request that your analysis and subsequent decisions include all phases of this project.**

The Illinois EPA does not regulate pipelines or pipeline conversion in any way.

The Illinois EPA regulates air, water, and land emissions/waste from stationary sources. The application under review is for the tank farm, a source of air emissions. Therefore it is the Bureau of Air's responsibility to review the project to ensure that it will meet the environmental regulations that apply. The Bureau of Air does not have the authority to address other aspects of the overall project, such as pipeline conversion, which spans several states and is appropriately addressed on the federal level. The Illinois EPA's Bureau of Water will address aspects of the project that affect water discharge.

**12. Can we be assured that monitoring procedures will be in place?**

The Illinois EPA will inspect this facility with the same frequency as other similar sources. The inspections will assure that the company is properly operating the facility to stay in compliance with their permit. The Illinois EPA routinely performs unannounced inspections if it feels that they are warranted, such as if it is receiving citizen complaints about a facility.

**13. Will the project use the best available control technology for containment and monitoring?**

Best Available Control Technology (BACT) is required of major new sources or significant modifications at existing major sources under the federal Prevention of Significant Deterioration rules (40 CFR 52.21). This facility will not be a major new source so a BACT analysis is not required of the facility.

The facility is required to meet the federal New Source Performance Standards. The NSPS will assure that emissions from the tank are well controlled.

**14. Whose requirements and regulations are they meeting?**

The facility must comply with the State of Illinois laws, rules and regulations governing tanks of this size. The laws and regulations are codified in the Illinois Environmental Protection Act and 35 Illinois Administrative Code: Subtitle B.

**15. Will baseline measurements be taken to record present pollutants in our air? And if so, will the EPA conduct testing in each of our yards? And what procedures will be used to conduct those tests**

The Illinois EPA has existing data about ambient air quality in the region of the proposed facility, has set permit limits at a level that will not diminish air quality, and will assess the

facility's compliance with permitted limits.

**16. Was it proper to use Cairo's meteorological data in the air modeling for this facility?**

The Cairo meteorological data is the National Weather Service location most representative of the project site.

**17. Marathon Ashland is a Centennial company. What are the quantity and nature of violations of EPA air quality and water quality standards committed by Marathon Oil at their Lawrenceville, Illinois facility in the past five years?**

The company has stated that Marathon Ashland Petroleum does not own or operate a facility in Lawrenceville, Ill. More importantly, the Illinois EPA cannot deny a permit for one site based on the environmental record of another site even if owned by the same company. Past violations cannot be considered in the review of the permit application. If TEPPCO violates any Illinois EPA regulations while operating at this site they will be subject to enforcement action.

Data on historic violations at a particular facility can be obtained from the Illinois EPA by submitting a Freedom of Information Act request. The address to send such a request is Illinois EPA, BOA FOIA Section, 1021 North Grand Avenue East, P.O. Box 19506, Springfield, IL 62794-9506.

**18. The regulations in 35 Illinois Administrative Code 166 have not been complied with and any proceedings relating to an application to the Illinois Environmental Protection Agency, Bureau of Air for a permit to construct and operate a pipeline breakout terminal as suggested in the purported notice are therefore improper, illegal and not in accordance with the EPA rules.**

The Illinois EPA believes that the rules under 35 IAC 166 were properly followed. However, a hearing on this facility is not a requirement for decision on the permit. A discretionary hearing was held to make the Illinois EPA staff easily accessible to the public to answer questions and receive comments pertaining to the facility.

**19. The notice was not in the Marion Daily Republican but in the Southern Illinoisan, a paper out of Carbondale.**

The Southern Illinoisan is a newspaper of general circulation in the area of Creal Springs. The Marion paper may be from a city that is closer however the Southern Illinoisan has a larger circulation and readership. In the future the Illinois EPA may use the Marion paper instead of/in addition to the Southern Illinoisan for notices in the area.

**20. The requirements of 35 IAC 166 require three notices of the hearing. The first notice of this hearing is invalid because the company listed was TOPPCO not TEPPCO.**

The Illinois EPA regrets that the newspaper made a typographical error in printing the notification. However, the typo was minor and the name is not the only information in the notice that indicates which facility is being referred to.

**21. The notice did not include the applicant's address.**

The address of the facility is given as "...Doran Road and Ralls Grove Road near Creal Springs ...". This address is the best that the agency had available. It is assumed that since this facility is not yet built that it does not have a listed post office address.

**22. The proposed permit and factsheet were not mailed to all of the elected officials including the State's Attorney as required by 35 IAC 166.**

In the interest of saving paper, the Illinois EPA sends a letter to elected officials, and other interested parties informing them of the pertinent information regarding the hearing and informs the persons on the mailing list that the permit, fact sheet and public notice can be obtained by calling the Illinois EPA offices, going to the local repository, in this case both the Marion Public Library, 206 South Market in Marion and at the Illinois EPA's offices at 2309 West Main Street, Suite 116 in Marion. The documents were readily available for review at the listed locations or by calling the Illinois EPA offices.

The letter informing of the hearing and stating where further information could be obtained was mailed to the appropriate local officials including the State's Attorney's Office in Williamson County.

**23. Illinois EPA has to act in a manner equivalent and virtually the same as United States EPA would have to due to the authorization that you have been given to administer this program.**

The permit is issued under the state permit program, which addresses non-major sources, not the federal permit program, which addresses major and potentially major sources of air emissions. The state permit program is not a delegated program from the USEPA and state law does not require public involvement in the process. However, in this case and routinely, if there is interest in a project, the Illinois EPA at its own discretion allows the opportunity for public input and a public hearing.

**24. I find that the lifetime permit to pollute into perpetuity a very disturbing situation**

Lifetime operating permits are issued only to non-major sources. The Illinois EPA monitors these facilities through inspections, record keeping and reporting requirements. The Illinois EPA retains the right to reopen the permit at any time to address issues that may arise.

**25. Citizens living near the tanks will suffer health problems.**

The Illinois EPA performed a screening of the hazardous air pollutant emissions from the facility to determine the impact of these substances off-site. Impacts at the property boundary indicated that there would not be a health impact from the permitted emissions of the facility off-site.

**26. How do you know what the emissions will be if the type of material to be stored in the tanks fluctuates?**

The Illinois EPA bases its emissions calculations on a worst-case scenario (uses the most volatile substances) to determine permitted limits. For the TEPPCO permit the emissions limitations were based on RVP-13 gasoline in the tanks with floating roofs and jet kerosene in the fixed roof tanks.

**27. If the USEPA were granting this permit, they would have to do an environment assessment and require a cumulative impact analysis.**

This is not a major source and the federal construction permit program, the Prevention of Significant Deterioration (PSD) program (40 CFR 52.21), which regulates major sources does not apply to this source. Even under the PSD program, only an air modeling demonstration is required not an environmental assessment.

As mentioned above the Illinois EPA performed a screening of the hazardous air pollutant emissions from the facility. This assessment determined that there should not be a health impact from this facility.

**28. Why is this facility being built here? We should have a say in where the facility is built.**

The Illinois EPA does not decide or evaluate where projects are to be located. The regulations for air quality are protective regardless of where a project is located, in rural or urban locations. Decisions about where a facility is built are left to local decision makers, e.g. city or county zoning boards.

**29. The economic benefits of the project are not relevant to this proceeding.**

This is correct. The Illinois EPA cannot take purported economic benefits into account when making its decision on a project.

**30. What is going to happen if that pipeline ruptures and pollutes our water supply?**

The company would be responsible for remediating contamination that results from its operations. This could include the necessity of providing bottled water if the water supply is contaminated and deemed unfit for human consumption.

## **Questions and Comments Addressing Other Aspects of the Illinois EPA**

### **31. What happens to the discharge when the company cleans the tanks?**

The residual wastes from this maintenance procedure will be properly handled according to IEPA requirements and will be disposed off-site as required.

### **32. If there's a spill of any kind, it will drain through my creeks.**

All surface precipitation and runoff from the facility will be contained onsite, inspected, then released in a controlled manner into existing drainage ways. No processes or activities will be conducted onsite that will add contaminants to facility runoff.

### **33. I also wanted to ask that you would employ or bring your own seismologist in to do the study, which is a big concern of ours.**

The Illinois EPA does not employ a seismologist because it has no regulatory authority over blasting, earthquakes or any other activities that would cause ground shockwaves. The Illinois EPA does not have the expertise or authority to do a seismology study.

### **34. The continual disruption by the noise created by the pumping units, piping, manifold, metering and associated equipment will be a constant intrusion to nearby residents.**

The air pollution control permit program does not address noise. There are state standards for noise. This facility must be designed and built to comply with those standards. Noise compliance can be verified once the plant is operational. Further noise questions or help can be obtained from the Illinois EPA's noise monitoring unit. Contact Greg Zac at 217/782-3397.

**Questions and Comments Answered by the Company:** The following questions pertain to subjects not within the Illinois EPA's expertise. The Illinois EPA has asked the company to provide responses to these questions. Except where noted the answer has been provided by TEPPCO. The Illinois EPA has not edited the answers or reviewed them for accuracy.

**35. What is a BLEVE?**

BLEVE is an acronym for Boiling Liquid Expanding Vapor Explosion. Potential for BLEVE is associated with pressurized liquid vessels - such as propane tanks. The proposed storage facility will have no pressurized vessels or tanks.

**36. Why did TEPPCO choose this site to build the storage facility? Why not use another site?**

Centennial sited the proposed storage facility near Creal Springs at the junction of the existing Trunkline natural gas pipeline and the two existing TEPPCO petroleum products pipelines. This location minimizes the construction and installation of additional pipe required to move the product in and out of storage, thereby minimizing ground disturbance and associated environmental impact.

Construction of the storage facility at a location other than that currently proposed would require an extension of all three pipelines (one Centennial and two TEPPCO) to the alternate site. Each pipeline would require installing pipe into and pipe out of the storage facility, a total of six pipelines that would be extended between the alternate storage facility site and the existing junction. Centennial estimates that the minimum right-of-way required for proper pipeline spacing for these new pipelines would be at least 175 feet wide. Development of this new pipeline right-of-way would result in additional environmental impacts to approximately 21.2 acres of additional land for each mile of pipeline installed.

*Illinois EPA note: The Illinois EPA has no role in siting or zoning facilities. This role is left up to local governmental bodies, such as city or county zoning authorities.*

**37. The EDF reports that one out of every four petroleum tanks leak.**

Each tank constructed will have a cathodic protection system installed below the steel bottom to mitigate external corrosion. Each tank will also be equipped with a release detection system that would alert operations personnel in the unlikely event a release occurred. Detection of any release would be followed by an investigation as to the cause and prompt corrective action.

**38. What are the design enhancements for storage tanks in the understood New Madrid fault zone?**

As required by the Department of Transportation, Title 49 Code of Federal Regulations Part 195, the liquid product storage tanks at the planned storage facility near Creal Springs will be designed in accordance with the seismic requirements of API Standard 650 (Welded Steel Tanks for Oil Storage) with modifications to the seismic load coefficients as determined by

probabilistic seismic hazard assessment for the Creal Springs site. These modifications will be made in accordance with the design methodology prescribed by the National Earthquake Hazard Reduction Program (NEHRP) seismic design provisions, and will essentially double the seismic design loads defined by the current edition of API 650 for the Creal Springs site. With these changes, our design approach for the liquid storage tanks will employ up-to-date seismic design criteria for the central United States and the latest state-of-the art methodology for seismic design of liquid storage tanks.

**39. There have been 4,600 earthquakes recorded in this area between July of 1974 and October the 4th, 1997.**

The number of earthquakes quoted here (4,600 earthquakes between July 1974 and October 4, 1997) includes earthquakes of all magnitudes, including those that have been instrumentally recorded but not felt. This rate of activity is not unusual for seismic areas. All earthquakes capable of causing damage to engineered facilities throughout this region have been taken into account in the seismotectonic model on which the ground motion hazard determination is based.

**40. I have been told that current seismic data and information is considered inaccurate at this time. There is a seismic study going on right now for the Jackson County area. I asked if there was anything going on for Creal Springs area, or anything planned, and I was told that none exists at this time, nor is anything planned. So, if Centennial's seismic expert is doing a seismic study, they are probably reviewing inaccurate or bogus data.**

The seismic hazard determination is based on current seismological, geological, and geophysical research and data that has been collected and performed throughout the central United States. In particular, recent earthquake research (published through October 2000) of the U.S. Geological Survey and Illinois Geological Survey in the region of southern Illinois was incorporated into the seismotectonic model for the Creal Springs site assessment.

**41. This pipeline is 700 miles long. There has to be another intersection where they can set up a tank farm.**

Centennial sited the Creal Springs storage facility at the junction of the existing Trunkline natural gas pipeline and the two existing TEPPCO petroleum products pipelines. This location minimizes the construction and installation of additional pipe required to move the product in and out of storage; thereby minimizing ground disturbance and associated environmental impact.

Construction of the Creal Springs storage facility at a location other than that currently proposed would require an extension of all three pipelines (one Centennial and two TEPPCO) to an alternate storage facility site. Each pipeline would require installing pipe into and pipe out of the storage facility. This would total six pipelines that would be extended between an alternate storage facility site and the existing junction.

Centennial estimates that the minimum right-of-way required for proper pipeline spacing for these new pipelines would be at least 175 feet wide. Development of this new pipeline right-of-

way would result in additional environmental impacts to approximately 21.2 acres of additional land for each mile of pipeline installed.

**42. Our property values have already depreciated because of the effects of Centennial Pipeline.**

After speaking with a number of people, including local realtors and property attorneys, Centennial does not believe that property values in the Creal Springs area will be adversely affected by the proposed storage facility.

**43. Who will be responsible if there is a catastrophic event at the facility?**

It is very unlikely that any incident would occur at the facility which could affect the general public outside the facility. However, the potential need to provide community shelter, food, potable water, transportation, counseling, communication, damage restitution, and other forms of assistance in the event of an emergency is recognized and will be incorporated into Emergency Response Plans.

**44. Trunkline Pipeline had 20 reported accidents from March 1985 to August 1999. There were six accidents from 1985 through '92, and 14 accidents from 1993 through '99. The company estimated property losses of \$1,810,000 for the first eight years and property losses of \$4,610,000 for the last seven. As this pipeline gets older, isn't it likely there will be more and more property damage losses for investors to absorb?**

The incidents referred to in this testimony include all incidents reported by Trunkline to the Federal Office of Pipeline Safety. Only two of the noted incidents relate to the 26-inch diameter pipeline. The statistics include seven incidents caused by third parties on other Trunkline owned pipelines as well as incidents on our offshore system that were caused by Hurricane Andrew. Trunkline is required to report all property loss involved with an event, including the cost of "gas lost," cost of pipe replaced and all remedial action costs. In addition, this amount includes the damage costs incurred on the offshore system resulting from Hurricane Andrew in the Gulf of Mexico.

Meetings have been held in each of the Regional Department of Transportation (DOT) Offices to discuss the technical issues of the conversion. As required by the DOT Office of Pipeline Safety, Centennial will perform a hydrostatic test of the entire length of the 26-inch diameter pipeline. In addition, Centennial will perform a comprehensive internal inline inspection of the entire pipeline.

**45. The pipeline itself doesn't have any correlation with supply. The supply is controlled by the oil companies, and if they are at maximum capacity in Texas and Louisiana, of which I am originally from, I am well aware of Exxon's capabilities and what they are doing with maximum capacity. The pipeline would have no bearing other than transporting the media to the Chicago area.**

Centennial pipeline will be a transporter of Gulf Coast sourced refined petroleum products. An

open access pipeline will allow various shippers to nominate volumes for shipment to the Midwest.

**46. This particular pipe is ASTM A 105 carbon steel pipe, and over the period of 50 years I presume that this pipe has experienced some form of hydrogen embrittlement. This is a quality control standard that is exemplified in the transportation of natural gas through the years, and I would ask that other alternatives be considered in regard to converting this pipeline from natural gas to liquid fuel.**

The Centennial 26-inch diameter pipeline to be converted is comprised of mostly API 5L Grade X-52 steel line pipe manufactured by Kaiser Steel, A.O. Smith Corporation, and Consolidated Western Steel. This is not ASTM 105 as suggested. There is no history of hydrogen embrittlement in this pipeline. Steel pipe manufactured for natural gas transmission lines is produced to a specification that eliminates the susceptibility to hydrogen embrittlement.

**47. Does it concern anybody that you would have a natural gas pipeline running through the project area?**

Two natural gas pipelines lie within the confines of the Creal Springs site. Trunkline conducted an internal inline inspection of one pipeline in 1996. The second pipeline is scheduled for an internal inline inspection in 2001. Trunkline will continue to maintain these pipelines per the requirements of DOT Part 192.

**48. Natural gas is piped at a much, much lower pounds per square inch than any liquid petroleum product. Also, liquid petroleum is far more corrosive than natural gas. And when you are putting something at a very high pounds per square inch through a very old pipeline with a product that is highly corrosive, you have a recipe for disaster. I want to make sure that that is considered when you look at this project.**

The maximum allowable operating pressure of the petroleum products pipeline following conversion will not be higher than the original maximum allowable operating pressure of the natural gas pipeline. The operating pressure of the liquid line is generally lower due to the pressure gradient.

The Centennial pipeline will transport refined petroleum products. There is no technical evidence to support the statement that "liquid petroleum is far more corrosive than natural gas," as it relates to Centennial.

**49. Home heating costs have already risen 30 percent and are expected to increase 50 to 100 percent, and yet Centennial proposes to convert a natural gas pipeline to 20 petroleum fuels, leaving even less natural gas for heating homes.**

With the recent construction of major natural gas pipeline facilities into the Midwest, there is significantly more pipeline capacity than required by the natural gas market. Thus conversion of the pipeline will not affect natural gas customers.

## **50. Who is TEPPCO?**

TE Products Pipeline Company, Limited Partnership is a subsidiary of TEPPCO Partners, L.P. (NYSE: TPP). TEPPCO Partners, L.P., a publicly traded master limited partnership, conducts business through various subsidiary operating companies, including TE Products Pipeline Company, Limited Partnership. Texas Eastern Products Pipeline Company, LLC, an indirect wholly owned subsidiary of Duke Energy Field Services, LP, is the general partner of TEPPCO Partners, L.P. and TE Products Pipeline Company, Limited Partnership. All three entities are commonly referred to as TEPPCO. TE Products Pipeline Company, Limited Partnership, is organized in Delaware, and headquartered in Houston, Texas. TEPPCO is one of the largest common carrier pipelines of refined petroleum products and liquefied petroleum gases in the United States.

## **51. Who are the companies involved in this project? What is their liability if there is a problem at the site or with the pipeline?**

The three companies that have come together to form Centennial Pipeline LLC are Marathon Ashland Petroleum LLC, Panhandle Eastern Pipe Line Company, a subsidiary of CMS Energy Corporation, and TE Products Pipeline Company, Limited Partnership, through its general partner, Texas Eastern Products Pipeline Company, LLC, (TEPPCO).

Based in Findlay, Ohio, Marathon Ashland Petroleum LLC, (MAPLLC), owned 62 percent by Marathon Oil Company -- a part of USX-Marathon Group (NYSE: MRO) -- and 38 percent by Ashland Inc. (NYSE: ASH), is the nation's fourth largest refiner of petroleum products with 935,000 barrels-per-day capacity.

Panhandle Eastern Pipeline Company, based in Houston, Texas, is a subsidiary of CMS Energy Corporation (NYSE: CMS). CMS Energy Corporation is based in Dearborn, Mich., and has annual sales of about \$6 billion with assets of about \$15 billion in the United States and around the world with businesses in electric and natural gas utility operations; independent power production; natural gas pipelines, gathering, processing and storage; oil and gas exploration and production; and energy marketing, services and trading.

TE Products Pipeline Company, Limited Partnership is a subsidiary of TEPPCO Partners, L.P. (NYSE: TPP). TEPPCO Partners, L.P., a publicly traded master limited partnership, conducts business through various subsidiary operating companies, including TE Products Pipeline Company, Limited Partnership. Texas Eastern Products Pipeline Company, LLC, an indirect wholly owned subsidiary of Duke Energy Field Services, LP, is the general partner of TEPPCO Partners, L.P. and TE Products Pipeline Company, Limited Partnership. All three entities are commonly referred to as TEPPCO. TE Products Pipeline Company, Limited Partnership, is organized in Delaware, and headquartered in Houston, Texas. TEPPCO is one of the largest common carrier pipelines of refined petroleum products and liquefied petroleum gases in the United States.

Upon completion of the Centennial project, Marathon Ashland Pipe Line LLC, (MAPL) a wholly owned subsidiary of MAPLLC, will operate the 26-inch diameter petroleum products

pipeline from Beaumont, Texas, to Effingham, Ill.

CMS Energy Corporation will assist MAPL in the management and maintenance of the Centennial Pipeline right-of-way.

The storage facility near Creal Springs will be operated by TEPPCO.

Limited Liability Company is a business term. This type of company has the same financial, taxpaying, safety and environmental responsibilities and duties of any business. There are no financial limits on Centennial's legal responsibilities resulting from being a limited liability company. Centennial is governed by the same pollution laws and has the same safety and environmental responsibilities as any citizen engaged in the pipeline transportation business. There may be certain limits of Centennial's liability arising under those pollution laws, but these would apply to Centennial regardless of its being a limited liability company. As a responsible corporate citizen, Centennial will insure its operations to cover its liability risks associated with operation of the pipeline and storage facility.

In the unlikely event that a release of product occurs, the operator of the pipeline, MAPL, would immediately initiate an emergency response in accordance with its Emergency Response Plan (OPA 90 Plan). Response activity would include proper notification of local, state, and federal agencies; source control; and control, containment and recovery of any released product. Safety of the public and responding personnel would be of the highest priority. MAPL would utilize both its own trained response personnel and professional emergency response contractors as needed to quickly control the situation.

**52. Will we have a petroleum storage tank remediation fund?**

Centennial will insure for its liabilities associated with the storage facility operations and will establish accounting reserves for such liabilities.

**FOR ADDITIONAL INFORMATION**

**Questions about the comment period, public hearing and permit decision should be directed to:**

**Bradley Frost, Community Relations Coordinator  
Illinois Environmental Protection Agency  
Office of Community Relations  
1021 N. Grand Ave. East  
P.O. Box 19276  
Springfield, IL 62794-9276  
217/782-7027**

Signed: \_\_\_\_\_ Date: \_\_\_\_\_  
**William Seltzer, Hearing Officer**