



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 3-3348-00082/00010

Renewal Number: 3

03/01/2016

Facility Identification Data

Name: GLOBAL COMPANIES - CARGO TERMINAL

Address: 1096 RIVER RD

NEW WINDSOR, NY 12553

Owner/Firm

Name: GLOBAL COMPANIES LLC

Address: 800 SOUTH ST, P.O. Box 9161

WALTHAM, MA 02453, USA

Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:

Name: THOMAS M MILLER

Address: NYSDEC - REGION 3

21 S PUTT CORNERS RD

NEW PALTZ, NY 12561-1696

Phone:8452563149

Division of Air Resources:

Name: THOMAS M MILLER

Address: NYSDEC - REGION 3

21 S PUTT CORNERS RD

NEW PALTZ, NY 12561-1696

Phone:8452563149

Air Permitting Contact:

Name: TY KROPP

Address: GLOBAL COMPANIES LLC

1184 RIVER RD

NEW WINDSOR, NY 12553

Phone:8455614100

Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project

Application for renewal of an Air Title V permit.

Attainment Status



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GLOBAL COMPANIES - CARGO TERMINAL is located in the town of NEW WINDSOR in the county of ORANGE.

The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

| Criteria Pollutant | Attainment Status |
|---|-------------------------|
| Particulate Matter (PM) | ATTAINMENT |
| Particulate Matter < 10µ in diameter (PM10) | ATTAINMENT |
| Sulfur Dioxide (SO2) | ATTAINMENT |
| Ozone* | MODERATE NON-ATTAINMENT |
| Oxides of Nitrogen (NOx)** | ATTAINMENT |
| Carbon Monoxide (CO) | ATTAINMENT |

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.

** NOx has a separate ambient air quality standard in addition to being an ozone precursor.

Facility Description:

The Global Cargo Terminal facility is a gasoline and distillate oil storage and distribution terminal located in New Windsor, New York. The facility operates a loading rack used to fill cargo trucks with gasoline and distillate fuel. Vapors are recovered from the gasoline loading operation (cargo trucks) and controlled by the operation of two open flares. The facility utilizes eighteen storage tanks of varying volume to manage onsite inventory of gasoline and distillate oil products. Of the eighteen storage tanks, six are used to store gasoline products and are required to control associated vapor emissions.

This renewal permit reauthorizes current operations which does not include the intermodal rail project permit modification (crude oil) applied for on August 14, 2013. The intermodal rail project application related to the South, North and Newburgh terminals was withdrawn by Global Companies on October 2, 2014.

Distillate oil and gasoline throughputs are limited by Federally Enforceable conditions established as part of initial permitting. Specifically, the facility is limited to a yearly gasoline throughput of 236,000,000 gallons and a yearly throughput of distillate fuel of 1,419,100,000 gallons. These limits ensure that individual hazardous air pollutants emissions and total hazardous air pollutant emissions are below the major stationary source thresholds of 10 tons per year and 25 tons per year respectively. Title V permitting applies to this facility since potential volatile organic compound emissions exceed the major stationary source threshold of 50 tons per year.

The Global Cargo Terminal facility is subject to numerous monitoring, recordkeeping and reporting requirements outlined by permit conditions under federal and state regulation including but not limited to 6NYCRR 201, 6NYCRR 225, 6NYCRR 229, 40CFR Part 60-Ka, 40CFR Part 60-JJJJ (Part 201 exempt source), 40CFR Part 63-JJJJJ (Part 201 exempt source), 40CFR Part 63-BBBBBB and 40CFR Part 64.

The Standard industrial Classification representative of this facility is 5171 - Petroleum Bulk Stations and



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Terminals.

Permit Structure and Description of Operations

The Title V permit for GLOBAL COMPANIES - CARGO TERMINAL is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

- combustion - devices which burn fuel to generate heat, steam or power
- incinerator - devices which burn waste material for disposal
- control - emission control devices
- process - any device or contrivance which may emit air contaminants that is not included in the above categories.

GLOBAL COMPANIES - CARGO TERMINAL is defined by the following emission unit(s):

Emission unit U00005 -

Six (6) storage tanks of different volumes capable of storing petroleum liquid or volatile organic liquids as those terms are defined in 6NYCRR Part 229. These tanks are external fixed roof equipped with internal floating roofs. Tank identifications with associated operating capacities include:

17414 - 2,856,420 gallons

30531 - 1,367,100 gallons

30532 - 2,784,180 gallons

30533 - 700,980 gallons

30534 - 4,983,930 gallons

30535 - 4,793,000 gallons

The remaining tanks onsite are used to store distillate and or residual fuels which are not subject to



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Emission unit U00005 is associated with the following emission points (EP):
00414, 00531, 00532, 00533, 00534, 00535
Process: OO6 Storage of petroleum liquid or volatile organic liquids as those terms are defined in
6NYCRR Part 229.

Emission unit U00001 -
Loading Rack equipped with two bottom fill bays capable of loading gasoline. Vapors are
recovered from tanker trucks and controlled by the operation of two open flares.

Emission unit U00001 is associated with the following emission points (EP):
00001, 00002
Process: OO1 Submerged filling of petroleum liquid or volatile organic liquids as those terms are defined
in 6NYCRR Part 229 within cargo tanker trucks. Vapors displaced during the filling process are collected
and controlled.

Title V/Major Source Status

GLOBAL COMPANIES - CARGO TERMINAL is subject to Title V requirements. This determination is
based on the following information:
Potential VOC emissions exceed the major stationary source threshold of 50 tpy.

Program Applicability

The following chart summarizes the applicability of GLOBAL COMPANIES - CARGO TERMINAL with
regards to the principal air pollution
regulatory programs:

| Regulatory Program | Applicability |
|--------------------------------|---------------|
| PSD | NO |
| NSR (non-attainment) | NO |
| NESHAP (40 CFR Part 61) | NO |
| NESHAP (MACT - 40 CFR Part 63) | YES |
| NSPS | YES |
| TITLE IV | NO |
| TITLE V | YES |
| TITLE VI | NO |
| RACT | NO |
| SIP | YES |



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NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52, 6 NYCRR 231-7, 231-8) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR 231-5, 231-6) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61, 6 NYCRR 200.10) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's).

MACT Maximum Achievable Control Technology (40 CFR 63, 6 NYCRR 200.10) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60, 6 NYCRR 200.10) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78, 6 NYCRR 201-6) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH, 6 NYCRR 200.10) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status



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Facility is in compliance with all requirements.

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis

of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code

Description

5171

PETROLEUM BULK STATIONS & TERMINALS

SCC Codes

SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information.Each SCC represents

a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code

Description

4-04-001-16

BULK TERMINALS/PLANTS
BULK TERMINALS
GASOLINE RVP13/RVP10/RVP7: WITHDRAWAL LOSS
(67000 BBL) FLOATING ROOF

4-04-002-50

BULK TERMINALS/PLANTS
BULK PLANTS
Loading Racks

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

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| Cas No. | Contaminant Name | PTE | |
|-------------|-------------------------------|--------|--------------------------|
| | | lbs/yr | Range |
| 000071-43-2 | BENZENE | | > 0 but < 10 tpy |
| 000630-08-0 | CARBON MONOXIDE | | >= 10 tpy but < 25 tpy |
| 000100-41-4 | ETHYLBENZENE | | > 0 but < 10 tpy |
| 000110-54-3 | HEXANE | | > 0 but < 10 tpy |
| 001634-04-4 | METHYL TERTBUTYL ETHER | | > 0 but < 10 tpy |
| 0NY210-00-0 | OXIDES OF NITROGEN | | >= 10 tpy but < 25 tpy |
| 000540-84-1 | PENTANE, 2,2,4- TRIMETHYL- | | > 0 but < 10 tpy |
| 000108-88-3 | TOLUENE | | > 0 but < 10 tpy |
| 0NY100-00-0 | TOTAL HAP | 48000 | |
| 0NY998-00-0 | VOC | | >= 100 tpy but < 250 tpy |
| 001330-20-7 | XYLENE, M, O & P MIXT. | | > 0 but < 10 tpy |

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- (1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;
- (3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

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- Item B: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10(b)**
The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.
- Item C: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.2(a)(4)**
Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.
- Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.2(d)(12)**
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.4(a)(2)**
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.4(a)(3)**
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4(a)(5)**
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.
- Item H: Property Rights - 6 NYCRR 201-6.4(a)(6)**
This permit does not convey any property rights of any sort or any exclusive privilege.
- Item I: Severability - 6 NYCRR Part 201-6.4(a)(9)**
If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

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Item J: Permit Shield - 6 NYCRR Part 201-6.4(g)

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item K: Reopening for Cause - 6 NYCRR Part 201-6.4(i)

This Title V permit shall be reopened and revised under any of the following circumstances:

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.



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Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item L: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item M: Federally Enforceable Requirements - 40 CFR 70.6(b)

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Regulatory Analysis

| Location Facility/EU/EP/Process/ES | Regulation | Condition | Short Description |
|---------------------------------------|------------|-----------|-------------------|
|---------------------------------------|------------|-----------|-------------------|

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| -- | | | | |
| FACILITY | ECL 19-0301 | 77 | | Powers and Duties of the Department with respect to air pollution control |
| FACILITY | 40CFR 60-A.4 | 35 | | General provisions - Address |
| FACILITY | 40CFR 60-A.7(a) | 36 | | Notification and Recordkeeping |
| FACILITY | 40CFR 60-A.7(f) | 37 | | Notification and Recordkeeping |
| FACILITY | 40CFR 60-JJJJ | 38 | | Standards of Performance for Stationary Spark Ignition Internal Combustion Engines |
| FACILITY | 40CFR 60-JJJJ.4233(e) | 39 | | Emission limits for IC Engines > 100 HP |
| U-00005/-/006/30535 | 40CFR 60-Kb.112b(a)(1) | 73 | | NSPS for volatile organic liquid storage vessels- standard for volatile organic compounds (VOC) |
| U-00005/-/006/30535 | 40CFR 60-Kb.113b(a) | 74 | | NSPS for volatile organic liquid storage vessels- testing and procedures |
| U-00005/-/006/30535 | 40CFR 60-Kb.115b(a) | 75 | | NSPS for volatile organic liquid storage vessels- reporting and recordkeeping requirements |
| U-00005/-/006/30535 | 40CFR 60-Kb.116b(a) | 76 | | NSPS for volatile organic liquid storage vessels- monitoring of operations |
| U-00001 | 40CFR 60-XX.502(e) | 58 | | Gasoline terminal loading racks over 20,000 gallons/day - standards for VOC |
| U-00001 | 40CFR 60-XX.502(f) | 59 | | Gasoline terminal loading racks over 20,000 gallons/day - standards for VOC |
| U-00001 | 40CFR 60-XX.502(g) | 60 | | Gasoline terminal loading racks over 20,000 gallons/day - standards for VOC |
| U-00001 | 40CFR 60-XX.502(h) | 61 | | Gasoline terminal loading racks over 20,000 gallons/day - standards for VOC |
| U-00001 | 40CFR 60-XX.502(i) | 62 | | Gasoline terminal loading racks over 20,000 gallons/day - standards for VOC |
| U-00001 | 40CFR 60-XX.502(j) | 63 | | Gasoline terminal loading racks over 20,000 gallons/day - standards for VOC |

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| U-00001 | 40CFR 60-XX.505 (b) | 64 | Gasoline terminal loading racks over 20,000 gallons/day - reporting and recordkeeping |
| U-00001 | 40CFR 60-XX.505 (e) (2) | 65 | NSPS for Bulk Gasoline Terminals - Reporting and Recordkeeping Provisions |
| FACILITY | 40CFR 63-BBBBBB | 40, 41 | NESHAP for Area Source Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities |
| FACILITY | 40CFR 63-BBBBBB.11087 | 42 | NESHAP for Area Source Gasoline Bulk Terminals - Requirements for Tanks |
| FACILITY | 40CFR 63-BBBBBB.11088 | 43 | NESHAP for Area Source Bulk Gasoline Terminals - Requirements for Loading Racks |
| FACILITY | 40CFR 63-BBBBBB.11089 | 44 | NESHAP for Area Source Gasoline Bulk Terminals - Equipment Leak Inspections |
| U-00001/00001 | 40CFR 63-BBBBBB.11092 (a) | 67 | Testing and monitoring requirements - Flares |
| U-00001/00002 | 40CFR 63-BBBBBB.11092 (a) | 69 | Testing and monitoring requirements - Flares |
| U-00001/00001 | 40CFR 63-BBBBBB.11092 (b) | 68 | NESHAP for Area Source Gasoline Bulk Terminals - Testing and Monitoring Provisions |
| U-00001/00002 | 40CFR 63-BBBBBB.11092 (b) | 70 | NESHAP for Area Source Gasoline Bulk Terminals - Testing and Monitoring Provisions |
| U-00005 | 40CFR 63-BBBBBB.11092 (e) | 72 | NESHAP for Area Source Gasoline Bulk Terminals - Inspections of gasoline storage tanks |
| FACILITY | 40CFR 63-BBBBBB.11093 | 45, 46 | NESHAP for Area Source Gasoline Bulk Terminals - Notifications |
| FACILITY | 40CFR 63-BBBBBB.11094 (b) | 47 | NESHAP for Area Source Gasoline Bulk Terminals - Recordkeeping |
| FACILITY | 40CFR 63-BBBBBB.11094 (c) | 48 | NESHAP for Area Source Gasoline Bulk Terminals - Recordkeeping |



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| FACILITY | 40CFR 63- BBBBBB.11094 (d) | 49 | NESHAP for Area Source Bulk Gasoline Terminals - Recordkeeping |
| FACILITY | 40CFR 63- BBBBBB.11094 (e) | 50 | NESHAP for Area Source Gasoline Bulk Terminals - Recordkeeping |
| FACILITY | 40CFR 63- BBBBBB.11095 (a) | 51 | NESHAP for Area Source Gasoline Bulk Terminals - Reporting |
| FACILITY | 40CFR 63- BBBBBB.11095 (b) | 52 | NESHAP for Area Source Gasoline Bulk Terminals - Reporting |
| FACILITY | 40CFR 63-BBBBBB.11098 | 53 | NESHAP for Area Source Gasoline Bulk Terminals - General Provisions |
| FACILITY | 40CFR 63-JJJJJJ | 54 | National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources |
| FACILITY | 40CFR 63- JJJJJJ.11223 (e) | 55 | ICI Boiler Area Source NESHAP - Oil- Fired Boilers less than 5 mmBtu/hr Tune- ups |
| U-00001 | 40CFR 64 | 66 | COMPLIANCE ASSURANCE MONITORING |
| FACILITY | 40CFR 68 | 19 | Chemical accident prevention provisions |
| FACILITY | 40CFR 82-F | 20 | Protection of Stratospheric Ozone - recycling and emissions reduction |
| FACILITY | 6NYCRR 200.6 | 1 | Acceptable ambient air quality. |
| FACILITY | 6NYCRR 200.7 | 10 | Maintenance of equipment. |
| FACILITY | 6NYCRR 201-1.4 | 78 | Unavoidable noncompliance and violations |
| FACILITY | 6NYCRR 201-1.7 | 11 | Recycling and Salvage |
| FACILITY | 6NYCRR 201-1.8 | 12 | Prohibition of reintroduction of collected contaminants to the air |
| FACILITY | 6NYCRR 201-3.2 (a) | 13 | Exempt Activities - Proof of eligibility |
| FACILITY | 6NYCRR 201-3.3 (a) | 14 | Trivial Activities - proof of eligibility |
| FACILITY | 6NYCRR 201-6 | 21, 56, 57 | Title V Permits and the Associated Permit Conditions |
| FACILITY | 6NYCRR 201-6.4 (a) (4) | 15 | General Conditions - Requirement to Provide Information |
| FACILITY | 6NYCRR 201-6.4 (a) (7) | 2 | General Conditions - Fees |



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| FACILITY | 6NYCRR 201-6.4 (a) (8) | 16 | General Conditions - |
| FACILITY | 6NYCRR 201-6.4 (c) | 3 | Right to Inspect |
| FACILITY | 6NYCRR 201-6.4 (c) (2) | 4 | Recordkeeping and |
| FACILITY | 6NYCRR 201-6.4 (c) (3) (ii) | 5 | Reporting of |
| FACILITY | 6NYCRR 201-6.4 (d) (4) | 22 | Compliance Monitoring |
| FACILITY | 6NYCRR 201-6.4 (e) | 6 | Records of |
| FACILITY | 6NYCRR 201-6.4 (f) (6) | 17 | Monitoring, Sampling |
| FACILITY | 6NYCRR 201-7.1 | 23 | and Measurement |
| FACILITY | 6NYCRR 202-1.1 | 18 | Reporting |
| FACILITY | 6NYCRR 202-2.1 | 7 | Requirements - |
| FACILITY | 6NYCRR 202-2.5 | 8 | Deviations and |
| FACILITY | 6NYCRR 211.1 | 27 | Noncompliance |
| FACILITY | 6NYCRR 215.2 | 9 | Compliance Schedules |
| FACILITY | 6NYCRR 225-1.2 | 28 | - Progress Reports |
| FACILITY | 6NYCRR 225-1.6 (b) | 79 | Compliance |
| FACILITY | 6NYCRR 225-3.3 (a) | 29 | Certification |
| FACILITY | 6NYCRR 225-3.4 (a) | 30 | Off Permit Changes |
| FACILITY | 6NYCRR 225-3.4 (b) | 31 | Emission Capping in |
| U-00005 | 6NYCRR 229.3 (a) | 71 | Facility Permits |
| FACILITY | 6NYCRR 229.3 (d) | 32 | Required emissions |
| FACILITY | 6NYCRR 229.5 | 33 | tests. |
| FACILITY | 6NYCRR 229.5 (c) | 34 | Emission Statements - |
| | | | Applicability |
| | | | Emission Statements - |
| | | | record keeping |
| | | | requirements. |
| | | | General Prohibitions |
| | | | - air pollution |
| | | | prohibited |
| | | | Open Fires - |
| | | | Prohibitions |
| | | | Sulfur-in-Fuel |
| | | | Limitations |
| | | | Recordkeeping |
| | | | Requirements |
| | | | RVP Limitation - May |
| | | | 1st through September |
| | | | 15th |
| | | | Gasoline records to |
| | | | be maintained |
| | | | Records to be |
| | | | provided with |
| | | | distributed gasoline |
| | | | Petroleum fixed roof |
| | | | tank control |
| | | | requirements |
| | | | Gasoline loading |
| | | | terminals |
| | | | Recordkeeping. |
| | | | Recordkeeping - |
| | | | gasoline loading |
| | | | terminals |

Applicability Discussion:

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-0301

This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6 NYCRR 200.6

Acceptable ambient air quality - prohibits contravention of ambient air quality standards without



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mitigating measures

6 NYCRR 200.7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6 NYCRR 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR 201-3.3 (a)

The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR Subpart 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6 NYCRR 201-6.4 (a) (4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.



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6 NYCRR 201-6.4 (a) (7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.4 (a) (8)

This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6 NYCRR 201-6.4 (c)

This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6 NYCRR 201-6.4 (c) (2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6 NYCRR 201-6.4 (c) (3) (ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6 NYCRR 201-6.4 (d) (5)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6 NYCRR 201-6.4 (e)

Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6 NYCRR 201-6.4 (f) (6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6 NYCRR 202-1.1

This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.



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6 NYCRR 202-2.1

Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calENDar year.

6 NYCRR 202-2.5

This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6 NYCRR 215.2

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

40 CFR Part 68

This Part lists the regulated substances and there applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act AmENDments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements

In addition to Title V, GLOBAL COMPANIES - CARGO TERMINAL has been determined to be subject to the following regulations:

40 CFR 60.112b (a) (1)

This requirement describes the standard for volatile organic compounds or VOC's for storage vessels with the following criteria: a design capacity greater than or equal to 151 m³ containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 5.2 kPa but less than 76.6 kPa or with a design capacity greater than or equal to 75 m³ but less than 151 m³ containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 27.6 kPa but less than 76.6 kPa, and equipped with a fixed roof in combination with an internal floating roof.

40 CFR 60.113b (a)

This requirement sets forth the testing and inspection procedures for determining compliance with VOC standards for storage vessels with a capacity greater than 40 cubic meters, storing volatile organic liquids for which construction, reconstruction or modification commenced after 7/23/84.

40 CFR 60.115b (a)

This regulation describes the reporting and recordkeeping requirements for fixed roof storage vessels equipped with an internal floating roof having a capacity greater than 40 cubic meters, storing volatile organic liquids for which construction, reconstruction, or modification commenced after 7/23/84.



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40 CFR 60.116b (a)

This is the records retention requirement for all records required by this section.

40 CFR 60.4

This condition lists the USEPA Region 2 address for the submittal of all communications to the "Administrator". In addition, all such communications must be copied to NYSDEC Bureau of Quality Assurance (BQA).

40 CFR 60.4233 (e)

This condition identifies the internal combustion engines greater than 100 horsepower is exempt from Part 201 permitting and is a manufacturer certified compliant unit..

40 CFR 60.502 (e)

This regulation specifies the procedures for loading liquid product into vapor-tight gasoline trucks.

40 CFR 60.502 (f)

This regulation requires that loadings of gasoline tank trucks are to be made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system.

40 CFR 60.502 (g)

This regulation requires that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck at the affected facility. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the affected loading tracks.

40 CFR 60.502 (h)

This regulation requires that the vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading.

40 CFR 60.502 (i)

This regulation prohibits the opening of any pressure-vacuum vent in the bulk gasoline terminal's vapor collection system at a system pressure less than 4,500 pascals (450 mm of water).

40 CFR 60.502 (j)

This regulation requires the inspection of the vapor collection system, the vapor processing system, and each loading rack handling gasoline during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks, each calendar month. Each detection of a leak is to be recorded and the source of the leak repaired within 15 calendar days after it is detected.



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40 CFR 60.505 (b)

40 CFR 60.505 (e) (2)

40 CFR 60.7 (a)

This regulation requires any owner or operator subject to a New Source Performance Standard (NSPS) to furnish the Administrator with notification of the dates of: construction or reconstruction, initial startup, any physical or operational changes, commencement of performance testing for continuous monitors and anticipated date for opacity observations as required.

40 CFR 60.7 (f)

This condition specifies requirements for maintenance of files of all measurements, including continuous monitoring system (CMS), monitoring device, and performance testing measurements; all CMS performance evaluations; all CMS or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices for at least two years.

40 CFR 63.11087

40 CFR 63.11088

40 CFR 63.11089

40 CFR 63.11092 (a) (4)

This regulation states that the performance test requirements of §63.11092(a) do not apply to flares defined in §63.11100 and meeting the flare requirements in §63.11(b). The owner or operator shall demonstrate that the flare and associated vapor collection system is in compliance with the requirements in §63.11(b) and 40 CFR 60.503(a), (b), and (d).

40 CFR 63.11092 (b) (2)

40 CFR 63.11092 (e) (1)



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40 CFR 63.11093

40 CFR 63.11094 (b)

40 CFR 63.11094 (c)

40 CFR 63.11094 (d)

This condition requires the facility to itemize equipment in gasoline service required for the leak detection program.

40 CFR 63.11094 (e)

This condition requires a log book detailing the results of implementing the leak detection program.

40 CFR 63.11095 (a)

40 CFR 63.11095 (b)

40 CFR 63.11098

40 CFR 63.11223 (e)

This condition states the tune-up requirements for oil-fired boilers with a heat input capacity less than 5 mmBtu/hr.

40 CFR Part 60, Subpart JJJJ

NYS is not delegated authority of 40CFR 60.JJJJ. Accordingly, questions concerning this regulation should be directed to USEPA.

40 CFR Part 63, Subpart BBBB



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40 CFR Part 63, Subpart JJJJJ

This regulation covers facilities that own or operate an industrial, commercial, or institutional boiler as defined in §63.11237 that is located at, or is part of, an area source of hazardous air pollutants (HAP), as defined in §63.2, except as specified in §63.11195.

40 CFR Part 64

The federal Compliance Assurance Monitoring (CAM) rule, 40 CFR Part 64, requires monitoring of control device, capture system, and/or process parameters to provide a reasonable assurance of compliance with emission limitations or standards. It applies to emission units that use a control device to comply with certain standards and limitations and that have potential pre-control device emissions equal to or greater than a major source threshold.

Acid Rain program requirements; stratospheric ozone protection requirements; post-1990 New Source Performance Standards, Emission Guidelines, and National Emission Standards for Hazardous Air Pollutants; and some other limitations are exempt from CAM. However, many of the exempt requirements are subject to less stringent periodic monitoring under 40 CFR Part 70 and 6NYCRR Subpart 201-6.

6 NYCRR 201-7.1

This section of Part 201-7 specifies the criteria that need to be met in order to restrict emissions to avoid Title V or other applicable requirements using federally enforceable permit conditions permit.

6 NYCRR 211.1

This regulation requires that no person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property.

6 NYCRR 225-1.2

This section of the regulation establishes sulfur-in-fuel limitations for coal, residual oil, distillate oil, and waste oil.

6 NYCRR 225-1.6 (b)

This citation sets the the types of records a subject facility must keep to prove compliance with this Subpart.

6 NYCRR 225-3.3 (a)



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6 NYCRR 225-3.4 (a)

This regulation requires the owner or operator of any refinery, terminal or bulk plant to maintain records of the amount of gasoline delivered to or distributed from the facility.

6 NYCRR 225-3.4 (b)

This regulation specifies the records that shall be provided with gasoline distributed from the facility. These include the maximum Reid vapor pressure of the gasoline, the time period it is intended to be dispensed and the quantity and shipment date.

6 NYCRR 229.3 (a)

This subdivision contains the control requirements for petroleum fixed roof tanks.

6 NYCRR 229.3 (d)

This rule contains the emission limits and operating requirements for gasoline loading terminals (i.e. those facilities with an average daily throughput of gasoline greater than 20,000 gallons).

6 NYCRR 229.5

This section specifies the recordkeeping requirements for gasoline bulk plants, gasoline loading terminals, petroleum liquid storage tanks, volatile liquid storage tanks and marine vessel loading facilities subject to the requirements of 229.3.

6 NYCRR 229.5 (c)

This subdivision specifies that a record of the average daily gasoline throughput, in gallons per year be maintained for gasoline loading terminals subject to Part 229.

Compliance Certification

Summary of monitoring activities at GLOBAL COMPANIES - CARGO TERMINAL:

| Location Facility/EU/EP/Process/ES | Cond No. | Type of Monitoring |
|---|-----------------|--|
| ----- | | |
| --- | | |
| FACILITY | 39 | record keeping/maintenance procedures |
| U-00005/-/006/30535 | 73 | record keeping/maintenance procedures |
| U-00005/-/006/30535 | 74 | record keeping/maintenance procedures |
| U-00005/-/006/30535 | 75 | record keeping/maintenance procedures |
| U-00005/-/006/30535 | 76 | record keeping/maintenance procedures |
| U-00001 | 58 | record keeping/maintenance procedures |
| U-00001 | 61 | monitoring of process or control device parameters as surrogate |
| U-00001 | 62 | monitoring of process or control device parameters as surrogate |
| U-00001 | 63 | record keeping/maintenance procedures |
| U-00001 | 64 | record keeping/maintenance procedures |
| U-00001 | 65 | record keeping/maintenance procedures |
| FACILITY | 40 | record keeping/maintenance procedures |



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| | | |
|---------------|----|--|
| FACILITY | 41 | record keeping/maintenance procedures |
| FACILITY | 42 | record keeping/maintenance procedures |
| FACILITY | 43 | record keeping/maintenance procedures |
| FACILITY | 44 | record keeping/maintenance procedures |
| U-00001/00001 | 67 | record keeping/maintenance procedures |
| U-00001/00002 | 69 | record keeping/maintenance procedures |
| U-00001/00001 | 68 | record keeping/maintenance procedures |
| U-00001/00002 | 70 | record keeping/maintenance procedures |
| FACILITY | 47 | record keeping/maintenance procedures |
| FACILITY | 48 | record keeping/maintenance procedures |
| FACILITY | 49 | record keeping/maintenance procedures |
| FACILITY | 50 | record keeping/maintenance procedures |
| FACILITY | 51 | record keeping/maintenance procedures |
| FACILITY | 52 | record keeping/maintenance procedures |
| FACILITY | 55 | record keeping/maintenance procedures |
| U-00001 | 66 | record keeping/maintenance procedures |
| FACILITY | 5 | record keeping/maintenance procedures |
| FACILITY | 6 | record keeping/maintenance procedures |
| FACILITY | 24 | record keeping/maintenance procedures |
| FACILITY | 25 | work practice involving specific operations |
| FACILITY | 26 | work practice involving specific operations |
| FACILITY | 7 | record keeping/maintenance procedures |
| FACILITY | 28 | work practice involving specific operations |
| FACILITY | 79 | record keeping/maintenance procedures |
| FACILITY | 29 | monitoring of process or control device parameters as surrogate |
| FACILITY | 30 | record keeping/maintenance procedures |
| FACILITY | 31 | record keeping/maintenance procedures |
| FACILITY | 32 | intermittent emission testing |
| FACILITY | 33 | record keeping/maintenance procedures |
| FACILITY | 34 | record keeping/maintenance procedures |

Basis for Monitoring

Global Companies Cargo Terminal

Title V Permit Renewal 3

Facility wide Hazardous Air pollutant emissions are limited to less than 25 tons per year total and 10 tons per year individually. In order to ensure HAP emissions are below major stationary source status, Federally enforceable throughput limits were established as part of the initial Title V permit issuance. Gasoline throughput is limited to an annual rolling twelve month total of 236,000,000 gallons and distillate fuels limited to an annual twelve month total of 1,419,100,000 gallons. Accordingly, the Gasoline Distribution NESHAP under 40CFR Part 63 Subpart R does not apply. In evaluating emissions at the capped throughput values, the total of all processes (permitted and exempt) are considered that include material transfer at the loading rack (gasoline controlled by the open flares), equipment fugitive, and storage tank losses. Total potential VOC emissions are calculated as less than 130 tons per year.

Annual throughput values reported are listed below.

| Year | Gasoline Throughput (gal) | Distillate throughput (gal) |
|------|---------------------------|-----------------------------|
| 2011 | 221,602,196 | 57,518,104 |



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| | | |
|------|-------------|------------|
| 2012 | 210,052,058 | 54,530,235 |
| 2013 | 223,724,980 | 54,278,243 |

Annual emissions reported are listed below.

| Year | Total HAP (lbs) | VOC (lbs) |
|------|-----------------|-----------|
| 2011 | 4319 | 206,542 |
| 2012 | 4378 | 191,938 |
| 2013 | 5211 | 239,356 |

The Global Cargo facility is a listed source under 6NYCRR Part 201(b)(21)(iii)(v) as an owner of a petroleum storage and transfer facility with a storage capacity exceeding 300,000 barrels. Accordingly, VOC fugitive emissions are included in the major stationary source status determination and for any New Source Review evaluation. Fugitive emissions are not, however, subject to permitting as a process. Although exempt from permitting, the facility does report fugitive emissions (e.g. cargo tanker losses, pipe losses, storage tank cleaning etc.) as part of the annual emission statement.

As part of the Title V permit renewal 2 modification 1 (issued May 18, 2011), the facility completed an upgrade to incorporate gasoline blending operations with a modification to the gasoline loading rack. This modification resulted in the rack operations as being subject to the requirements of 40CFR 60-XX. The permit modification also addressed an ownership change from Warex to Global Companies LLC.

A Notification of Compliance status was received by the Department January 11, 2011 as required by 40CFR 63-BBBBBB. A supplemental notification of compliance status was received by the Department January 14, 2011 that provides supplier statements that the John Zink open flares conform to the requirements of 40CFR 63-BBBBBB.

The Global Cargo Terminal is subject to the requirements of 40CFR 63-BBBBBB highlighted below.

- The six storage tanks in gasoline service each have a capacity of greater than 75 cubic meters that are subject to Table 1 category 2b requiring internal floating roofs with seals and inspection requirements referring to 40CFR 60.Kb.
- The gasoline loading rack fits the Table 2 category 1 which requires the collection of displaced vapors from the cargo tanks during product loading, and limiting product loading to cargo tankers that are vapor tight.
- For the control of total organic compound, the open flares must comply with 40CFR 63.11(b) as specified by 40CFR 63.11092(a)(4).
- Monthly equipment leak detection is required under 63.11089 and 63.11094(e).

Note: The requirements under 40CFR 60-X are substantially similar to the requirements under 40CFR 63.BBBBBB.

6NYCRR Part 229 applies to this facility which requires:



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- Documentation of a lower Reid Vapor pressure during the ozone season.
- An emissions limit of organic compound exhausted from the open flares. Meeting the requirements of 40CFR 63.BBBBBB shall govern.

The facility operates a Part 201 exempt 333,000 Btu/hr oil fired boiler (Andrea Perisotti R3-6S) subject to 40CFR 63-JJJJJ. DEC has declined delegation of this regulation, however, the permit contains a condition that requires a tune-up every 5 years. This determination is based on Table 2 boiler subcategory 12 or 13 as existing or new. Notifications were sent to EPA with a copy to the Department (received 9/15/2011 and May 29, 2012).

The facility operates a Part 201 exempt 100 kw emergency gas fired generator (Kohler model 100REZGD) subject to 40CFR 60-JJJJ. DEC has declined delegation of this regulation, however, the permit contains a condition indicating manufacturer certification as per notification received by the Department July 19, 2012.

Relevant documents received during the ATV permit renewal 2 period are listed below.

- January 11, 2011 - Notification of Compliance Status 40CFR 63-BBBBBB.
- January 14, 2011 - Supplemental Notification of Compliance Status 40CFR 63-BBBBBB.
- June 27, 2011 – Notification of change to gasoline service Tank 30535 40CFR 63-BBBBBB and 40 CFR 60-Kb.
- July 19, 2011 – Notification of refill Tank 30535.
- September 15, 2011 – Initial Notification 40CFR 63-JJJJJ.
- December 22, 2011 – Tank 30535 inspection report 40CFR 60-Kb.
- May 8, 2012 – Refill Notice Tank 30534 40CFR 63-BBBBBB.
- May 29, 2012 – Notification of Compliance Status 40CFR 63-JJJJJ.
- July 19, 2012 – Notification of certified engine 40CFR 60-JJJJ.
- March 24, 2014 – Renewal 3 ATV permit application.

The Global Cargo Terminal is defined as a Bulk gasoline terminal which means any gasoline storage and distribution facility that receives gasoline by pipeline, ship or barge, or cargo tank and has a gasoline throughput of 20,000 gallons per day or greater. Gasoline throughput shall be the maximum calculated design throughput as may be limited by compliance with an enforceable condition under Federal, State, or local law and discoverable by the Administrator and any other person.

6NYCRR Part 229 defines Petroleum liquid as any crude oil, condensate, and any finished or intermediate products manufactured or extracted in a petroleum refinery whose true vapor pressure is between 1.5 and 12 psia (10.5-83 kilopascals) at 70° F. Petroleum liquids do not include Nos. 2 through 6 fuel oils.

6NYCRR Part 229 defines Volatile organic liquid as any organic liquid including, but not limited to, liquids that produce vapors which participate in atmospheric photochemical reactions, or which are measured by an applicable test method, but excluding petroleum liquids. The following are not considered to be volatile organic liquids for the purpose of this regulation: Gasoline, Nos. 2 through 6 fuel oil, commercial and military grades of diesel and aviation fuels.

Distillate and residual fuel oil storage tanks with storage capacities below 300,000 barrels (12,600,000 gallons) are exempt from permitting pursuant to 6NYCRR Part 201. The Global Cargo Terminal operates numerous storage vessels which meet this exemption.