

**Division of Air Resources
Permit Review Report**

Permit ID: 3-3348-00111/00023
Renewal Number: 4
05/15/2024

Facility Identification Data

Name: GLOBAL COMPANIES LLC - NEWBURGH-NORTH TERMINAL
Address: 1281 RIVER RD
New Windsor, NY 12553-6733

Owner/Firm

Name: GLOBAL COMPANIES LLC
Address: 800 SOUTH ST
PO BOX 9161
WALTHAM, MA 02453, USA
Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:
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21 S PUTT CORNERS RD
NEW PALTZ, NY 12561
Phone:8452563054

Division of Air Resources:
Name: DYLAN J KAHLSTORF
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New Paltz, NY 12561
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Air Permitting Facility Owner Contact:
Name: TOM KEEFE
Address: GLOBAL COMPANIES LLC
800 SOUTH ST
WALTHAM, MA 02453
Phone:7813984132

**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 is for renewal of both Air Title V permits and to combine both terminals into one Air Title V permit.

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Attainment Status

GLOBAL COMPANIES LLC - NEWBURGH-NORTH 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:

Global Companies LLC - Newburgh - North Terminal, located within the Town of New Windsor, New York, operates a gasoline and distillate oil storage and distribution terminal. The facility formerly consisted of the Global Newburgh and North Terminals but are being combined due to location and interconnectivity of the Terminals. The combined Terminal consists of three (3) loading racks used to fill cargo trucks with gasoline/ethanol and/or distillate fuel (including biofuels and renewable fuels). Vapors are recovered from gasoline loading operations and controlled by the operation of a vapor combustion unit (VCU01) at RACK1. RACK3 does not have a control device, and trucks are loaded with distillate fuels only. The facility utilizes twelve (12) storage tanks of varying volume to manage onsite inventory of gasoline and higher vapor pressure products. Each of these storage tanks are equipped with internal floating roofs to control emissions. Seven (7) exempt fixed roof tanks are used to store lower vapor pressure products. As part of the project to combine Terminals, biofuels and/or blendstock will be stored at the Terminal.

Distillate and gasoline throughputs are limited by Federally Enforceable conditions established as part of previously issued Title V permits. Specifically, the facility is limited to a rolling twelve-month gasoline throughput of 750,000,000 gallons and a rolling twelve-month total distillate fuel throughput of 400,000,000 gallons. These throughput limits ensure Hazardous Air Pollutant emissions are below major stationary source thresholds and ensure that the requirements of 40CFR 63 Subpart R - National Emission Standards for Gasoline Distribution Facilities do not apply.

The facility is subject to numerous recordkeeping, monitoring and reporting requirements under 6 NYCRR 229 -Petroleum and Volatile Organic Liquid Storage and Transfer, 40 CFR 60.XX - Standards of Performance for Bulk Gasoline Terminals, 40CFR64 - Continuous Assurance Monitoring and 40CFR63.BBBBBB - National Emission Standards for Hazardous Air Pollutants for Source Category:

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Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities and 40 CFR 63- JJJJJ (Part 201 Exempt Source).

Title V permitting applies to this facility since potential Volatile Organic Compound emissions exceed major stationary source thresholds defined by 6NYCRR 201. The Standard Industrial Classification representative of this facility is 5171 - Petroleum Bulk Stations and Terminals.

Permit Structure and Description of Operations

The Title V permit for GLOBAL COMPANIES LLC - NEWBURGH-NORTH 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 LLC - NEWBURGH-NORTH TERMINAL is defined by the following emission unit(s):

Emission unit 1FUGTV - Equipment Fugitives

Process: FG1 Miscellaneous fugitive emissions from valves, pumps, and flange leakage.

Emission unit 1RACKS - Three (3) truck loading racks

Emission unit 1RACKS is associated with the following emission points (EP):
TRK01, TRK02

Process: 1RD Distillate truck loading including kerosene and biofuels

Process: 1RG Loading of gasoline and lower vapor pressure petroleum liquids (except distillate and biofuels) with HAPs equal to or less than gasoline

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Process: FGT Fugitive emissions from tank trucks during gasoline loading at the Newburgh Truck Rack and North Gas Truck Rack (RACKA and RACKB)

Emission unit 1TANKS - Twelve (12) storage tanks of varying volumes, all equipped with internal floating roofs (IFR)

Emission unit 1TANKS is associated with the following emission points (EP):
 00012, 00013, 00017, 00027, 00028, 00030, T0001, T0002, T0003, T0004, T0005, T0010
 Process: GAS Storage of gasoline and lower vapor pressure petroleum liquids with HAPs equal to or less than gasoline.

Process: VOL is located at TANK FARM6 - Storage of volatile organic liquids including blendstocks with a maximum vapor pressure less than 11.1 psi at maximum monthly average temperature.

Title V/Major Source Status

GLOBAL COMPANIES LLC - NEWBURGH-NORTH TERMINAL is subject to Title V requirements. This determination is based on the following information:
 Global Companies LLC - Newburgh - North Terminal is subject to Title V requirements. This determination is based on the following information:

Potential VOC emissions exceed the major source threshold of 50 tons per year.

Program Applicability

The following chart summarizes the applicability of GLOBAL COMPANIES LLC - NEWBURGH-NORTH 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

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SIP	YES
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NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52.21, 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 212-3, 220-1.6, 220-1.7, 220-2.3, 220-2.4, 226, 227-2, 228, 229, 230, 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

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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

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
4-04-001-51	BULK TERMINALS/PLANTS BULK TERMINALS
4-04-001-53	Valves, Flanges, and Pumps BULK TERMINALS/PLANTS BULK TERMINALS
4-04-001-54	Vapor Control Unit Losses BULK TERMINALS/PLANTS BULK TERMINALS
4-04-001-60	Tank Truck Vapor Leaks BULK TERMINALS/PLANTS BULK TERMINALS
4-04-002-50	INTERNAL FLOAT ROOF W/ PRIMARY SEAL-SPECIFY LIQUID:STANDING LOSS 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

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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 for each contaminant that is displayed represents the facility-wide PTE in tons per year (tpy) or pounds per year (lbs/yr). In some instances the PTE represents a federally enforceable emissions cap or limitation for that contaminant. 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.

Cas No.	Contaminant	PTE lbs/yr	PTE tons/yr	Actual lbs/yr	Actual tons/yr
000071-43-2	BENZENE	2420			
000098-82-8	BENZENE, (1-METHYLETHYL)	40			
0NY750-00-0	CARBON DIOXIDE EQUIVALENTS		9490.9		
000100-41-4	ETHYLBENZENE	460			
000110-54-3	HEXANE	8600			
000067-56-1	METHYL ALCOHOL	10720			
000091-20-3	NAPHTHALENE	17.22			
000540-84-1	PENTANE, 2,2,4-TRIMETHYL-	2680			
000108-88-3	TOLUENE	460			
0NY100-00-0	TOTAL HAP	49000		20300	
0NY998-00-0	VOC	460560			

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: 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 B: 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 C: 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.

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- Item D: 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 E: 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 F: 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 G: 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 H: 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.
- Item I: 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;

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- 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 J: 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.

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 K: 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 L: Federally Enforceable Requirements - 40 CFR 70.6(b)

All terms and conditions in this permit required by the Act or any applicable requirement,

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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: 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. item_02

Item B: 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

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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
--			
FACILITY	ECL 19-0301	82	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 60-A.4	46	General provisions - Address
FACILITY	40CFR 60-A.7 (a)	47	Notification and Recordkeeping
FACILITY	40CFR 60-A.7 (f)	48	Notification and Recordkeeping
FACILITY	40CFR 60-JJJJ	50	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
1-TANKS	40CFR 60-Kb.112b (a) (1)	75	NSPS for volatile organic liquid storage vessels- standard for volatile organic compounds (VOC)
1-TANKS	40CFR 60-Kb.113b (a)	76	NSPS for volatile organic liquid storage vessels- testing and procedures
1-TANKS	40CFR 60-Kb.115b (a)	77	NSPS for volatile organic liquid storage vessels- reporting and recordkeeping requirements
1-TANKS	40CFR 60-Kb.116b (a)	78	NSPS for volatile organic liquid storage vessels- monitoring of operations
1-RACKS	40CFR 60-XX.502 (e)	65	Gasoline terminal loading racks over 20,000 gallons/day - standards for VOC
1-RACKS	40CFR 60-XX.502 (f)	66	Gasoline terminal loading racks over 20,000 gallons/day - standards for VOC
FACILITY	40CFR 60-XX.502 (g)	49	Gasoline terminal loading racks over 20,000 gallons/day - standards for VOC
1-RACKS	40CFR 60-XX.502 (h)	67	Gasoline terminal loading racks over

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1-RACKS	40CFR 60-XX.502 (i)	68	20,000 gallons/day - standards for VOC Gasoline terminal loading racks over 20,000 gallons/day -
1-RACKS	40CFR 60-XX.502 (j)	69	standards for VOC Gasoline terminal loading racks over 20,000 gallons/day -
1-RACKS	40CFR 60-XX.505 (b)	70	standards for VOC Gasoline terminal loading racks over 20,000 gallons/day -
1-RACKS	40CFR 60-XX.505 (e) (2)	71	reporting and recordkeeping NSPS for Bulk Gasoline Terminals - Reporting and Recordkeeping Provisions
1-TANKS	40CFR 63- BBBBBB.11087 (f)	79	NESHAP for Area Source Gasoline Bulk Terminals - Gasoline storage tank requirement exemption
FACILITY	40CFR 63- BBBBBB.11089	51	NESHAP for Area Source Gasoline Bulk Terminals - Equipment Leak Inspections
1-RACKS/-/1RG/VCU01	40CFR 63- BBBBBB.11092 (a)	72	NESHAP for Area Source Gasoline Bulk Terminals - Testing and Monitoring Provisions
FACILITY	40CFR 63- BBBBBB.11092 (b)	52	NESHAP for Area Source Gasoline Bulk Terminals - Testing and Monitoring Provisions
1-RACKS/TRK02/1RG/VCU01	40CFR 63- BBBBBB.11092 (d)	73	NESHAP for Area Source Gasoline Bulk Terminals - Operation of Vapor Processing System
1-TANKS	40CFR 63- BBBBBB.11092 (e)	80	NESHAP for Area Source Gasoline Bulk Terminals - Inspections of gasoline storage tanks
1-TANKS	40CFR 63- BBBBBB.11093	81	NESHAP for Area Source Gasoline Bulk Terminals - Notifications
FACILITY	40CFR 63- BBBBBB.11094 (b)	53	NESHAP for Area Source Gasoline Bulk Terminals - Recordkeeping
FACILITY	40CFR 63- BBBBBB.11094 (c)	54	NESHAP for Area Source Gasoline Bulk Terminals - Recordkeeping
FACILITY	40CFR 63- BBBBBB.11094 (d)	55	NESHAP for Area Source Bulk Gasoline Terminals -

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FACILITY	40CFR 63- BBBBBB.11095 (a)	57	Recordkeeping NESHAP for Area Source Gasoline Bulk Terminals - Reporting
FACILITY	40CFR 63- BBBBBB.11095 (b)	58	NESHAP for Area Source Gasoline Bulk Terminals - Reporting
FACILITY	40CFR 63- BBBBBB.11095 (c)	59	NESHAP for Area Source Gasoline Bulk Terminals - Reporting
FACILITY	40CFR 63-BBBBBB.11098	60	NESHAP for Area Source Gasoline Bulk Terminals - General Provisions
FACILITY	40CFR 63-JJJJJJ	61	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources
FACILITY	40CFR 64	62	COMPLIANCE ASSURANCE MONITORING
FACILITY	40CFR 68	18	Chemical accident prevention provisions
FACILITY	40CFR 82-F	19	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	83	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	20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 63, 64	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
FACILITY	6NYCRR 201-6.4 (a) (8)	16	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4 (c)	3	Recordkeeping and Reporting of
FACILITY	6NYCRR 201-6.4 (c) (2)	4	Compliance Monitoring Records of

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FACILITY	6NYCRR 201-6.4 (c) (3) (ii)	5	Monitoring, Sampling and Measurement Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4 (d) (4)	30	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4 (e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.4 (f)	31	Operational Flexibility
FACILITY	6NYCRR 202-1.1	17	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.4 (a) (3)	32	Emission statement methods and procedures
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	84	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	33	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 212	34, 35, 36, 37	Process Operations
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
FACILITY	6NYCRR 225-1.2 (d)	38	Sulfur-in-Fuel Limitation - Distillate Oil
FACILITY	6NYCRR 225-1.6 (b)	39	Fuel Analysis Records
FACILITY	6NYCRR 225-3.3 (a)	40	RVP Limitation - May 1st through September 15th
FACILITY	6NYCRR 225-3.4 (a)	41	Gasoline records to be maintained
FACILITY	6NYCRR 225-3.4 (b)	42	Records to be provided with distributed gasoline
FACILITY	6NYCRR 225-3.4 (d)	43	Maintenance and availability of gasoline records
1-TANKS	6NYCRR 229.3 (e) (1)	74	Volatile organic liquid storage tanks
FACILITY	6NYCRR 229.4 (a)	44	Testing and monitoring
FACILITY	6NYCRR 229.5	45	Recordkeeping.

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 mitigating measures

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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) (4)

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 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.

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.

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6 NYCRR 211.2

This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

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 their 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 LLC - NEWBURGH-NORTH 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.

40 CFR 60.116b (a)

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

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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 60.502 (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.

40 CFR 60.505 (b)

The documentation file for each gasoline tank truck is to be updated at least once per year to reflect current test results as determined by Method 27. This documentation shall include, as a minimum, the following information:

- (1) Test title: Gasoline Delivery Tank Pressure Test--EPA Reference Method 27.
- (2) Tank owner and address.
- (3) Tank identification number.
- (4) Testing location.
- (5) Date of test.

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- (6) Tester name and signature.
- (7) Witnessing inspector, if any: Name, signature, and affiliation.
- (8) Test results: Actual pressure change in 5 minutes, mm of water (average for 2 runs).

40 CFR 60.505 (e) (2)

This citation states the requirements for facilities that utilize a terminal automation system to prevent gasoline cargo tanks that do not have valid cargo tank vapor tightness documentation from loading.

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 (f)

This citation states that compliance with 40 CFR 60 subpart Kb satisfies the requirements of 40 CFR 63.11087.

40 CFR 63.11089

This regulation requires owners of gasoline tank terminals to perform a monthly leak inspection of all equipment in gasoline service.

40 CFR 63.11092 (a)

This regulation requires the owners of gasoline tank storage facilities to conduct a performance test on the vapor processing and collection systems at the facility.

40 CFR 63.11092 (b) (1) (iii)

This regulation requires each owner or operator of a bulk gasoline terminal subject to Subpart BBBBBB to install, calibrate, certify, operate, and maintain, according to the manufacturer's specifications, a

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continuous monitoring system (CMS) while gasoline vapors are displaced to the vapor processing systems.

40 CFR 63.11092 (d)

Requirements for operation of vapor processing system.

40 CFR 63.11092 (e) (1)

This citation details the inspection requirements for gasoline storage tanks with an internal floating roof.

40 CFR 63.11093

This regulation requires each owner/operator of an affected source under subpart BBBBBB to submit an initial notification as specified in §63.9(b).

40 CFR 63.11094 (b)

This regulation requires that the following test information be kept by the facility:

- Name of Test: Annual Certification Test - Method 27 or Periodic Railcar Bubble Leak Test Procedure.
- Cargo tank owner's name and address
- Cargo tank identification number
- Test location and date
- Tester name and signature
- Witnessing inspector, if any: name, signature, affiliation
- Vapor tightness repair: Nature of repair work and when performed in relation to vapor tightness testing
- Test results: Test pressure, pressure or vacuum change, mm of water; time period of test; number of leaks found with instrument; and leak definition.

40 CFR 63.11094 (c)

This regulation allows, as an alternative to keeping records at the terminal of each gasoline cargo tank test result as required in §63.11094(b), the facility may keep an electronic copy of each record which would be instantly available at the terminal. The copy of each record above must be an exact duplicate image of the original paper record with certifying signatures.

40 CFR 63.11094 (d)

This regulation states if the facility is subject to the equipment leak provisions of §63.11089, then the facility shall prepare and maintain a record describing the types, identification numbers, and locations of all equipment in gasoline service.

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40 CFR 63.11094 (e)

This regulation states if the facility is subject to the requirements for equipment leak inspections in §63.11089, then the facility shall record in the log book for each leak that is detected, the information below:

- 1) The equipment type and identification number.
- 2) The nature of the leak (i.e., vapor or liquid) and the method of detection (i.e., sight, sound, or smell).
- 3) The date the leak was detected and the date of each attempt to repair the leak.
- 4) Repair methods applied in each attempt to repair the leak.
- 5) "Repair delayed" and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak.
- 6) The expected date of successful repair of the leak if the leak is not repaired within 15 days.
- 7) The date of successful repair of the leak.

40 CFR 63.11095 (a)

This regulation requires the owner or operator of a gasoline storage facility to, in their semi-annual report, describe the control equipment in use at the facility, the results of inspections conducted during the reporting period, and any repairs made as a result of the inspections.

40 CFR 63.11095 (b)

This regulation requires a facility that is subject to the control requirements in Subpart BBBBBBB, to submit an excess emissions report to NYSDEC at the time the semiannual compliance report is submitted.

40 CFR 63.11095 (c)

This citation states the requirement to submit a semiannual excess emission report.

40 CFR 63.11098

Table 3 of subpart BBBBBBB lists which parts of the general provisions in subpart A apply to the facility.

40 CFR Part 60, Subpart JJJJ

Subpart JJJJ applies to manufacturers, owners, and operators of stationary spark ignition (SI) internal combustion engines (ICE) as specified in §60.4230, paragraphs (a)(1) through (6). Sources subject to Subpart JJJJ must comply with emission standards for nitrogen oxides, carbon monoxide, and volatile organic compounds.

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

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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.

6 NYCRR 201-6.4 (f)

This section describes the potential for certain operational changes to be made by the facility owner or operator without first obtaining a permit modification. Changes made pursuant to this provision must meet all of the criteria described in this section to qualify for consideration as operational flexibility. The Department reserves the right to require the facility owner or operator to obtain a permit modification prior to making any changes at the facility pursuant to this section.

6 NYCRR 202-2.4 (a) (3)

Once a facility is required to submit annual emission statements electronically, emission statements must be submitted to the department per the specified schedule, in this regulation beginning the reporting year that a Title V permit containing a condition mandating electronic submittal is issued.

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 (d)

This subdivision sets the sulfur-in-fuel limitation for distillate oil fired emission sources throughout the State.

6 NYCRR 225-1.6 (b)

This subdivision requires the retention of fuel analyses at a subject facility.

6 NYCRR 225-3.3 (a)

This citation states the Reid vapor pressure limit for gasoline from May 1st through September 15th.

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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 225-3.4 (d)

This regulation requires the facility to maintain records that may be required under 6 NYCRR Part 225-3.4(a), (b) or (c). These records must be made available to the commissioner or his or her representative, for inspection during normal business hours, at the location from which the gasoline was delivered, sold, or dispensed.

6 NYCRR 229.3 (e) (1)

This regulation requires fixed roof storage tanks subject to Part 229 to be equipped with an internal floating roof with a liquid-mounted primary seal and gasketed fittings, or equivalent control. Furthermore, replacement of other than liquid mounted seals is to be performed only when the tank is cleaned and gas-freed for other purposes.

6 NYCRR 229.4 (a)

This subdivision specifies the test methods that must be used when a test is required to determine compliance with Part 229.

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 Part 212

Part 212 applies to process emission sources and/or emission points associated with a process operation, unless excepted from the provision of this Part pursuant to Section 212-1.4 of this Subpart.

Compliance Certification

**Summary of monitoring activities at GLOBAL COMPANIES LLC - NEWBURGH-NORTH
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Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring

1-TANKS	75	record keeping/maintenance procedures
1-TANKS	76	record keeping/maintenance procedures
1-TANKS	77	record keeping/maintenance procedures
1-TANKS	78	record keeping/maintenance procedures
1-RACKS	65	record keeping/maintenance procedures
1-RACKS	67	monitoring of process or control device parameters as surrogate
1-RACKS	69	record keeping/maintenance procedures
1-RACKS	70	record keeping/maintenance procedures
1-RACKS	71	record keeping/maintenance procedures
FACILITY	51	record keeping/maintenance procedures
1-RACKS/-/1RG/VCU01	72	intermittent emission testing
FACILITY	52	record keeping/maintenance procedures
1-RACKS/TRK02/1RG/VCU01	73	record keeping/maintenance procedures
1-TANKS	80	record keeping/maintenance procedures
FACILITY	53	record keeping/maintenance procedures
FACILITY	54	record keeping/maintenance procedures
FACILITY	55	record keeping/maintenance procedures
FACILITY	56	record keeping/maintenance procedures
FACILITY	57	record keeping/maintenance procedures
FACILITY	58	record keeping/maintenance procedures
FACILITY	62	record keeping/maintenance procedures
FACILITY	21	work practice involving specific operations
FACILITY	22	work practice involving specific operations
FACILITY	23	monitoring of process or control device parameters as surrogate
FACILITY	24	record keeping/maintenance procedures
FACILITY	25	work practice involving specific operations
FACILITY	26	work practice involving specific operations
FACILITY	27	work practice involving specific operations
FACILITY	28	record keeping/maintenance procedures
FACILITY	29	intermittent emission testing
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
FACILITY	34	record keeping/maintenance procedures
FACILITY	35	record keeping/maintenance procedures
FACILITY	36	record keeping/maintenance procedures
FACILITY	37	record keeping/maintenance procedures
FACILITY	38	work practice involving specific operations
FACILITY	39	record keeping/maintenance procedures
FACILITY	40	work practice involving specific operations
FACILITY	41	record keeping/maintenance procedures
FACILITY	42	record keeping/maintenance procedures
FACILITY	43	record keeping/maintenance procedures
FACILITY	44	record keeping/maintenance procedures
FACILITY	45	record keeping/maintenance procedures

Basis for Monitoring

Condition 21 - 6 NYCRR 201-6:

Tank maintenance emissions (including landings and clearings) will not exceed 41.81 tons per year on a rolling 12-month basis. Staying below this emissions level, the Gasoline Distribution NESHAP under 40CFR 63 Subpart R will not apply.

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Condition 22 - 6 NYCRR 201-6:

Facility-wide throughput of gasoline and ethanol (combined) shall be limited to no more than 750,000,000 gallons on a rolling 12-month basis. Staying below this throughput level, the Gasoline Distribution NESHAP under 40CFR 63 Subpart R will not apply.

Condition 23 - 6 NYCRR 201-6:

Facility-wide throughput of blendstock (through the four permitted tanks) shall be limited to no more than 200,000,000 gallons on a rolling 12-month basis. Staying below this throughput level, the Gasoline Distribution NESHAP under 40CFR 63 Subpart R will not apply.

Condition 24 - 6 NYCRR 201-6:

Facility-wide throughput of distillate (including biofuels) shall be limited to no more than 400,000,000 gallons on a rolling 12-month basis. Staying below this throughput level, the Gasoline Distribution NESHAP under 40CFR 63 Subpart R will not apply.

Condition 26 - 6 NYCRR 201-6:

Global Companies has opted for a limit on VOC emissions of 10 milligrams per liter (0.0835 lb per 1000 gallons) of gasoline throughput. Compliance with this limit also serves as compliance with 6 NYCRR 229.3(d).

Compliance testing of the Vapor Combustion Unit must be performed once per every (5) years in order to verify compliance. This test also will verify that the Ultraviolet Flame Detector (UFD) verifies flame presence at all times during product loading.

Condition 31 - 6 NYCRR 212

In regards to a tank degassing event at the facility, the facility shall calculate an actual benzene concentration for each degassing event at the facility. If the facility is unable to meet values provided within the submitted Attachment A, the facility must notify the Department and all alternatives shall be explored with regards to mitigating emissions from the specific vapor space purge event.

Condition 32 - 6 NYCRR 212

In regards to a refilling a cleaned tank at the facility, the facility shall calculate an actual benzene concentration for each refill event at the facility. If the facility is unable to meet values provided within the submitted Attachment A, the facility must notify the Department and all alternatives shall be explored with regards to mitigating emissions from the specific vapor space purge event.

Condition 33 - 6 NYCRR 212

As a result of the submitted modelling, the facility is only allowed to conduct one internal floating roof refill, cleaning refill, or vapor space purge event at any one time. This is to assure the short term guideline concentration for benzene is not exceeded.

Condition 34 - 6 NYCRR 212

In regards to an in-service tank refill at the facility, the facility shall calculate an actual benzene concentration for each refill event at the facility. If the facility is unable to meet values provided within the submitted Attachment A, the facility must notify the Department and all alternatives shall be explored with regards to mitigating emissions from the specific vapor space purge event.

Condition 35 - 6 NYCRR 225-1.2(d)

This regulation establishes sulfur-in-fuel limitations for the distillate oil used and sold by the facility.

Condition 36 - 6 NYCRR 225-1.6(b)

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This regulation requires the facility to obtain fuel analysis on all quantities of fuel used and sold by the facility. The regulation also calls for all purchasers, analyses, and data from fuel sales to be kept and recorded at the facility. Specific information required by fuel analyses is also documented within this regulation.

Condition 37 - 6 NYCRR 225-3.3(a)

This condition restricts the Reid vapor pressure of gasoline during the ozone season.

Condition 38 - 6 NYCRR 225-3.4(a)

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.

Condition 39 - 6 NYCRR 225-3.4(b)

This regulation specifies that certain records will be provided when gasoline is distributed from this facility. These records include:

- Certification under 6 NYCRR 225-3.4
- Document of maximum Reid Vapor Pressure if the gasoline was subject to 6 NYCRR 225-3.3
- Designation of time period which the gasoline is intended to be dispensed to motor vehicles
- Quantity of Fuel and Shipment Date

Condition 41 - 6 NYCRR 229.4(a)

This subdivision specifies the test methods that must be used when a test is required to determine compliance with 6 NYCRR 229.

Condition 49 - 40 CFR 63.11089, Subpart BBBBBB

This condition outlines the requirements to perform inspections, recordkeeping, and reporting requirements needed regarding equipment leaks.

Condition 50 - 40 CFR 63.11092(b)(1)(iii), Subpart BBBBBB

This condition outlines the monitoring process for the vapor processing system. This facility has opted to follow alternative monitoring as defined in Subpart BBBBBB.

Condition 51 - 40 CFR 63.11094(b), Subpart BBBBBB

This condition outlines testing requirements for each gasoline cargo tank loading, as well as the specifics to be included in subsequent records.

Condition 52 - 40 CFR 63.11094(c), Subpart BBBBBB

This condition lists the alternative compliance option to the above condition (40 CFR 63.11094(b)).

Condition 53 - 40 CFR 63.11094(d), Subpart BBBBBB

This condition outlines record-keeping requirements related to 40 CFR 63.11089.

Condition 54 - 40 CFR 63.11094(e)

This condition outlines the recordkeeping requirements of the leak detection program

Condition 55 - 40 CFR 63.11095(a)

This condition stipulates a semi-annual reporting for certain criteria regarding the storage tank inspections and leak detection program.

Condition 56 - 40 CFR 63.11095(b)

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Semi-annual reporting required for excess emissions associated with leak detection procedural variances.

Condition 58 - 40 CFR 63.11098

Table 3 lists Appendix A requirements that apply

Condition 59 - 40 CFR Part 63, Subpart JJJJJJ

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.

Condition 60 - 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. The facility plans to achieve compliance with this condition via daily, weekly, and monthly inspections. Inspection and maintenance procedures of the manufacturer were implemented.

Condition 63 - 40 CFR 60.502(e), NSPS Subpart XX

This condition restricts loading of product into only vapor-tight gasoline tank trucks and outlines vapor tightness procedures and record-keeping measures.

Condition 68 - 40 CFR 60.505(b), NSPS Subpart XX

This condition outlines tank truck vapor documentation and recordkeeping procedures.

Condition 69 - 40 CFR 60.505(e)(2), NSPS Subpart XX

This condition provides the alternative to compliance options in the above condition (40 CFR 60.505)

Condition 70 - 40 CFR 60.18(c), Subpart A

This condition outlines all requirements for flares at the facility.

Condition 71 - 40 CFR 63.11(b)(6)(i), Subpart A

This condition outlines compliance options related to the flare's heat content specifications at the facility.

Condition 74 - 40 CFR 63.11092(a)

As per the performance test on the vapor processing system, a limit of 80 milligrams per liter was assigned to the flare to achieve compliance with Subpart BBBBBB.

Condition 75 - 40 CFR 63.11092(d), Subpart BBBBBB

This condition outlines the requirements and conditions of operating the vapor processing system, and handling corrective action if applicable.

Condition 77 - 40 CFR 60.112b(a)(1), NSPS Subpart Kb

This condition stipulates the installation and management of fixed roofs and internal floating roofs in relation to tanks at the facility.

Condition 78 - 40 CFR 60.113b(a)(1), NSPS Subpart Kb

This condition outlines the testing and maintenance procedures for internal floating roof systems when storing gasoline.

Condition 79 - 40 CFR 60.115b(a), NSPS Subpart Kb

Records of all internal floating roof inspections must be kept. If an inspection finds faults, reports must be

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furnished to applicable administrator within 30 days of inspection.