

**Division of Air Resources  
Permit Review Report**

**Permit ID: 7-3156-00030/00023**

**Renewal Number: 2**

**03/22/2021**

**Facility Identification Data**

Name: SUNOCO SYRACUSE TED PARK TERMINAL

Address: 2951 ENERGY DR

WARNERS, NY 13164

**Owner/Firm**

Name: SUNOCO PARTNERS MARKETING & TERMINALS LP

Address: 3801 W CHESTER PIKE

NEWTOWN SQUARE, PA 19073, USA

Owner Classification: Corporation/Partnership

**Permit Contacts**

Division of Environmental Permits:

Name: JONATHAN J STERCHO

Address: NYS DEC Region 7

615 Eire Blvd W

Syracuse, NY 13204-2400

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Division of Air Resources:

Name: ANDREW C LOFARO

Address: NYSDEC - REGION 7

615 ERIE BLVD W

SYRACUSE, NY 13204

Phone:3154267472

Air Permitting Facility Owner Contact:

Name: BRANDON BARLOW

Address: ENERGY TRANSFER PARTNERS

101 W 3RD ST FL 3

WILLIAMSPORT, PA 17701

Phone:5705053731

**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**

This permit action is a renewal of the current Title V facility permit and also includes a modification as the facility has accepted a reduced TOC limit and lower gasoline and distillate thruput caps to demonstrate compliance with New York State's ambient air quality guideline concentrations.

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**Attainment Status**

SUNOCO SYRACUSE TED PARK TERMINAL is located in the town of VAN BUREN in the county of ONONDAGA.

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*	TRANSPORT REGION (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:**

This facility is classified as a gasoline/distillate loading terminal (greater than 20,000 gallons/day) consisting of gasoline storage tanks along with several other storage tanks containing gasoline additives and heating oil/diesel. Gasoline loading is controlled with two 10 mg/l vapor reduction units.

**Permit Structure and Description of Operations**

The Title V permit for SUNOCO SYRACUSE TED PARK 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

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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.

SUNOCO SYRACUSE TED PARK TERMINAL is defined by the following emission unit(s):

Emission unit 1-GENR - One 1130 HP diesel generator used for emergency purposes.

Process: DSL Combustion of diesel fuel to generate electricity.

Emission unit 1MISCT - Additive tanks and fixed roof tanks which store distillate products and both gasoline and distillate additives. These tanks are not equipped with internal floating roofs for gasoline service.

Emission unit 1MISCT is associated with the following emission points (EP):  
02304, 02305, 02307, 02308, 02309, 02311, 02314, 02318, 02319

Process: FG2 is located at TANK FARM - Tanks containing additives.

Process: PST Storage Tanks containing non-gasoline fuels such as diesel and kerosene.

Emission unit 1RACKS - Truck loading rack operations with a total of seven (7) bays: all seven bays are used to bottom load gasoline or bottom load distillate. Operations include two vapor recovery units: VRU1 and VRU2 to control emissions from gasoline loading operations. Distillate loading operations also vent to the vapor recovery units. Loading bays B and C vent to VRU1 (McGill unit aka ES: VAPBC) while loading bays A, D, E, Y, and P vent to VRU2 (John Zink unit aka ES: VADEY). All Bays are capable of dispensing both gasoline and distillates with the following exceptions: Bay P is only capable of dispensing distillates and Bay E is only capable of dispensing gasoline.

Emission unit 1RACKS is associated with the following emission points (EP):  
000BC, 0ADEY

Process: RDS is located at LOADING AREA - Tank trucks are bottom loaded with distillates.

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Vapors are collected and are sent to the 2 vapor recovery units. Bays A, D, E, Y, and P vent to the John Zinc VRU (VRU 2, Emission Source VADEY). Bays B and C exhaust to the McGill VRU (VRU 1, Emission Source VAPBC).

Process: TTV is located at LOADING AREA - Fugitive emissions from leaks from tank trucks during loading.

Process: VRU is located at LOADING AREA - Fugitive emissions from losses from the vapor reduction units.

Emission unit 1TANKS - Eight (8) storage tanks, each having a capacity greater than 40,000 gallons to store gasoline, ethanol, or other lower vapor pressure fuel. Each tank has a fixed roof with an internal floating roof system.

Emission unit 1TANKS is associated with the following emission points (EP):  
 02301, 02302, 02303, 02306, 02313, 02315, 02316, 02317

Process: FG1 is located at TANK FARM - Miscellaneous fugitive HAP and VOC emissions from valves, pumps, and flange leakage. All emissions are at insignificant levels.

Process: GAS is located at TANK FARM - Eight (8) storage tanks, each having a capacity greater than 40,000 gallons to store gasoline, ethanol, or other lower vapor pressure fuel. Each tank has a fixed roof with an internal floating roof system.

**Title V/Major Source Status**

SUNOCO SYRACUSE TED PARK TERMINAL is subject to Title V requirements. This determination is based on the following information:

Facility is a major source for VOCs.

**Program Applicability**

The following chart summarizes the applicability of SUNOCO SYRACUSE TED PARK TERMINAL with regards to the principal air pollution regulatory programs:

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

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TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

**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 212-3, 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

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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**

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**

4226	SPECIAL WAREHOUSING & STORAGE
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**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**

2-01-001-02	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - DISTILLATE OIL (DIESEL) Reciprocating
4-04-001-22	BULK TERMINALS/PLANTS BULK TERMINALS FIXED ROOF TANKS (TANK DIAMETER INDEPENDANT)-DIESEL FUEL-WORKING LOSS
4-04-001-51	BULK TERMINALS/PLANTS BULK TERMINALS Valves, Flanges, and Pumps
4-04-001-52	BULK TERMINALS/PLANTS BULK TERMINALS Vapor Collection Losses
4-04-001-54	BULK TERMINALS/PLANTS BULK TERMINALS Tank Truck Vapor Leaks
4-04-001-60	BULK TERMINALS/PLANTS BULK TERMINALS INTERNAL FLOAT ROOF W/ PRIMARY SEAL-SPECIFY LIQUID:STANDING LOSS
4-04-002-50	BULK TERMINALS/PLANTS BULK PLANTS Loading Racks
4-07-999-97	ORGANIC CHEMICAL STORAGE ORGANIC CHEMICAL STORAGE - MISCELLANEOUS

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Specify in Comments

**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 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	4323			
000098-82-8	BENZENE, (1-METHYLETHYL)	77.43			
000095-63-6	BENZENE, 1,2,4-TRIMETHYL-	53.58			
000110-82-7	CYCLOHEXANE	446			
000100-41-4	ETHYLBENZENE	436			
000110-54-3	HEXANE	4246			
000091-20-3	NAPHTHALENE	3.55			
000540-84-1	PENTANE, 2,2,4-TRIMETHYL-	2235			
000108-88-3	TOLUENE	3373			
0NY100-00-0	TOTAL HAP	17240			
0NY998-00-0	VOC	182340			
001330-20-7	XYLENE, M, O & P MIXT.	2044			

**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.

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**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.

**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



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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 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 2 01-6.7 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**

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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, 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.

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(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 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**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Regulation</b>	<b>Condition</b>	<b>Short Description</b>
---			
FACILITY	ECL 19-0301	91	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 60-A.4	33	General provisions - Address
FACILITY	40CFR 60-A.7(b)	34	Notification and Recordkeeping
FACILITY	40CFR 60-A.7(f)	35	Notification and Recordkeeping
1-TANKS	40CFR 60-Kb.112b(a)	85	NSPS for volatile organic liquid storage vessels- standard for volatile organic compounds (VOC)
1-TANKS	40CFR 60-Kb.113b(a)(2)	86	NSPS for volatile organic liquid storage vessels- testing and procedures
1-TANKS	40CFR 60-Kb.113b(a)(4)	87	NSPS for volatile organic liquid storage vessels- testing and procedures
1-TANKS	40CFR 60-Kb.113b(a)(5)	88	NSPS for volatile organic liquid storage vessels- testing and procedures
1-TANKS	40CFR 60-Kb.116b	89	NSPS for volatile organic liquid

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1-RACKS/-/RGS	40CFR 60-XX.502(e)	72	storage vessels- monitoring of operations
1-RACKS/-/RGS	40CFR 60-XX.502(f)	73	Gasoline terminal loading racks over 20,000 gallons/day - standards for VOC
1-RACKS/-/RGS	40CFR 60-XX.502(g)	74	Gasoline terminal loading racks over 20,000 gallons/day - standards for VOC
1-RACKS/-/RGS	40CFR 60-XX.502(i)	75	Gasoline terminal loading racks over 20,000 gallons/day - standards for VOC
1-RACKS/-/RGS	40CFR 60-XX.502(j)	76	Gasoline terminal loading racks over 20,000 gallons/day - standards for VOC
1-RACKS/-/RGS	40CFR 60-XX.503(b)	77	Gasoline terminal loading racks over 20,000 gallons/day - test methods and procedures
1-RACKS/-/RGS	40CFR 60-XX.503(c)	78	Gasoline terminal loading racks over 20,000 gallons/day - test methods and procedures
1-RACKS/-/RGS	40CFR 60-XX.503(d)	79	Gasoline terminal loading racks over 20,000 gallons/day - test methods and procedures
1-RACKS/-/RGS	40CFR 60-XX.505(b)	80	Gasoline terminal loading racks over 20,000 gallons/day - reporting and recordkeeping
1-RACKS/-/RGS	40CFR 60-XX.505(c)	81	Gasoline terminal loading racks over 20,000 gallons/day - reporting and recordkeeping
1-RACKS/-/RGS	40CFR 60-XX.505(e)(2)	82	NSPS for Bulk Gasoline Terminals - Reporting and Recordkeeping Provisions
FACILITY	40CFR 63- BBBBBB.11081(a)	36	Definition of affected source
FACILITY	40CFR 63- BBBBBB.11083(b)	37	Compliance date for an existing affected source
1-RACKS	40CFR 63-BBBBBB.11085	61	NESHAP for Area Source Gasoline Bulk Terminals - General Duties to Minimize Emissions
1-TANKS	40CFR 63-BBBBBB.11087	90	NESHAP for Area Source Gasoline Bulk

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1-RACKS	40CFR 63-BBBBBB.11088	62	Terminals - Requirements for Tanks NESHAP for Area Source Bulk Gasoline Terminals - Requirements for Loading Racks
FACILITY	40CFR 63-BBBBBB.11089	38	NESHAP for Area Source Gasoline Bulk Terminals - Equipment Leak Inspections
1-RACKS	40CFR 63- BBBBBB.11092(a)	63	NESHAP for Area Source Gasoline Bulk Terminals - Testing and Monitoring Provisions
1-RACKS	40CFR 63- BBBBBB.11092(a)	64	Testing and monitoring provisions - gasoline loading racks
1-RACKS	40CFR 63- BBBBBB.11092(b)	65, 66, 67	NESHAP for Area Source Gasoline Bulk Terminals - Testing and Monitoring Provisions
1-RACKS	40CFR 63- BBBBBB.11092(b)	68	NESHAP for Area Source Gasoline Bulk Terminals - Testing and Monitoring Provisions
1-RACKS	40CFR 63- BBBBBB.11092(c)	69	NESHAP for Area Source Gasoline Bulk Terminals - Change to Operating Parameter
1-RACKS	40CFR 63- BBBBBB.11092(d)	70	NESHAP for Area Source Gasoline Bulk Terminals - Operation of Vapor Processing System
FACILITY	40CFR 63-BBBBBB.11093	39	NESHAP for Area Source Gasoline Bulk Terminals - Notifications
FACILITY	40CFR 63- BBBBBB.11094(a)	40	NESHAP for Area Source Gasoline Bulk Terminals - Recordkeeping Requirements
FACILITY	40CFR 63- BBBBBB.11094(b)	41	NESHAP for Area Source Gasoline Bulk Terminals - Recordkeeping
FACILITY	40CFR 63- BBBBBB.11094(d)	42	NESHAP for Area Source Bulk Gasoline Terminals - Recordkeeping
FACILITY	40CFR 63- BBBBBB.11094(e)	43	NESHAP for Area Source Gasoline Bulk Terminals - Recordkeeping
FACILITY	40CFR 63- BBBBBB.11095(a)	44	NESHAP for Area Source Gasoline Bulk Terminals - Reporting
FACILITY	40CFR 63-	45	NESHAP for Area

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	BBBBBB.11095(b)		Source Gasoline Bulk Terminals - Reporting NESHAP for Area
FACILITY	40CFR 63-BBBBBB.11098	46	Source Gasoline Bulk Terminals - General Provisions
1--GENR	40CFR 63-ZZZZ.6625(f)	52	Reciprocating Internal Combustion Engine (RICE) NESHAP - non-resettable hour meter for certain existing emergency engines
1--GENR	40CFR 63-ZZZZ.6640(f)	53	Reciprocating Internal Combustion Engine (RICE) NESHAP - emergency engines
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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.
1-RACKS/-/RGS	6NYCRR 200.6	71	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	92	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, 48, 49	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 Compliance Monitoring

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FACILITY	6NYCRR 201-6.4(c)(2)	4	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4(c)(3)(ii)	5	Reporting Requirements - Deviations and Noncompliance
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FACILITY	6NYCRR 201-7	22, 50	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-1.1	17	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	94	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	27	General Prohibitions - visible emissions limited.
1-RACKS	6NYCRR 212-1.5(e)(2)	95	Demonstrating compliance for Part 212 through the federal NESHAP program
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
FACILITY	6NYCRR 225-1.2(d)	28	Sulfur-inFuel Limitation - Distillate Oil
FACILITY	6NYCRR 225-3.3(a)	29	RVP Limitation - May 1st through September 15th
FACILITY	6NYCRR 225-3.4(a)	30	Gasoline records to be maintained
1-TANKS	6NYCRR 229.3(a)	83	Petroleum fixed roof tank control requirements
1-TANKS	6NYCRR 229.3(e)(1)	84	Volatile organic liquid storage tanks
FACILITY	6NYCRR 229.4(a)	31	Testing and monitoring
FACILITY	6NYCRR 229.5(c)	32	Recordkeeping - gasoline loading terminals
1-RACKS	6NYCRR 230.4(a)(1)	54	Gasoline transport vehicles - prohibitions and requirements.
1-RACKS	6NYCRR 230.4(b)	55	Gasoline transport vehicles - prohibitions and requirements.
1-RACKS	6NYCRR 230.4(e)	56	Gasoline transport vehicles - prohibitions and requirements.

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1-RACKS	6NYCRR 230.4(f)	57	Gasoline transport vehicles - prohibitions and requirements.
1-RACKS	6NYCRR 230.4(g)	58	Gasoline transport vehicles - prohibitions and requirements.
1-RACKS	6NYCRR 230.6(a)	59	Gasoline transport vehicles - recordkeeping and reporting.
1-RACKS	6NYCRR 230.6(b)	60	Gasoline transport vehicles - recordkeeping and reporting.

**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

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)



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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.

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

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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 202-2.1

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 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**

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In addition to Title V, SUNOCO SYRACUSE TED PARK TERMINAL has been determined to be subject to the following regulations:

40 CFR 60.112b (a)

Petroleum liquid products must be stored in a vessel with a fixed roof in combination with an internal floating roof which meets the design criteria of this subpart.

40 CFR 60.113b (a) (2)

IFRs must be visually inspected at least once every 12 months after initial fill.

40 CFR 60.113b (a) (4)

Requires more extensive visual inspections and repair during each degassing event.

40 CFR 60.113b (a) (5)

Administrator must be notified at least 30 days prior to filling or refilling a storage vessel.

40 CFR 60.116b

This regulation sets forth the parameters and test methods to be used to monitor the operations of Subpart Kb applicable storage vessels.

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 (i)

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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 60.503 (b)

Immediately before the performance test required to determine compliance with subpart 60.502(b), the facility must use method 21 to monitor for vapor leaks and repair any leaks greater than 10,000 ppm (as methane) before conducting the performance test.

40 CFR 60.503 (c)

Performance test shall be 6 hours in which 300,000 liters of gasoline is loaded along with additional stipulations for VRU Testing for 60.502(b).

40 CFR 60.503 (d)

Requires pressure tap be installed on VRU and highest pressure recorded every 5 minutes during the performance test.

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.
- (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 (c)

This regulation requires that a record of each monthly leak inspection required be kept on file at the terminal for at least 2 years. Inspection records shall include, as a minimum, the following information:

- (1) Date of inspection.
- (2) Findings (may indicate no leaks discovered; or location, nature,

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and severity of each leak).

(3) Leak determination method.

(4) Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days).

(5) Inspector name and signature.

40 CFR 60.505 (e) (2)

Facility may elect to use automated truck lock-out system for trucks that have not passed their vapor tightness check.

40 CFR 60.7 (b)

This regulation requires the owner or operator to maintain records of the occurrence and duration of any startup, shutdown, or malfunction of the source or control equipment or continuous monitoring system.

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 63.11081 (a)

This regulation defines the facilities subject to 40 CFR 63 Subpart BBBBBB. they are:

- 1) A bulk gasoline terminal that is not subject to the control requirements of 40CFR63, Subpart R or 40CFR63, Subpart CC.
- 2) A pipeline breakout station that is not subject to the control requirements of 40CFR63, subpart R.
- 3) A pipeline pumping station.
- 4) A bulk gasoline plant.

40 CFR 63.11083 (b)

This regulation states that an affected source must comply with the standards of this subpart no later than January 10, 2011.

40 CFR 63.11085

This condition lists the general duties with which a facility must comply to minimize emissions at gasoline bulk terminals.

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40 CFR 63.11087

This regulation requires the owner or operator of gasoline storage tanks to reduce the total organic HAP or TOC by 95% by weight, determine the volume of the tanks, inspect the tank on a regular basis, retain the results of the inspections and track and repairs made to the tanks as a result of the inspections.

40 CFR 63.11088

This regulation sets forth the requirements for gasoline loading racks located at gasoline loading terminals, including requirements to equip your loading rack(s) with a vapor collection system designed to collect the TOC vapors displaced from cargo tanks during product loading, and reduce emissions of TOC to less than or equal to 80 mg/l of gasoline loaded into gasoline cargo tanks at the loading rack, and design and operate the vapor collection system to prevent any TOC vapors collected at one loading rack or lane from passing through another loading rack or lane to the atmosphere.

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 (a) (2)

This regulation states that if the facility is operating a gasoline loading rack in compliance with 6 NYCRR Part 229.3(d)(1) which requires the loading rack to meet an emission limit of 80mg/L of gasoline loaded, then the facility may submit a statement by a responsible official of the facility certifying the compliance status of the loading rack in lieu of the test required in §63.11092(a)(1).

40 CFR 63.11092 (b) (1) (i) ('B') ('1')

Carbon Bed activity must be tested on an annual basis using ASTM Method D 5228-92.

40 CFR 63.11092 (b) (1) (i) ('B') ('2')

During each performance test, the facility must determine a monitored operating parameter for the VRU

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40 CFR 63.11092 (c)

Documentation of the reasons for changing operating parameters.

40 CFR 63.11092 (d)

Requirements for operation of vapor processing system.

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 (a)

Recordkeeping requirements.

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 (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.

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.

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- 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 BBBBBB, to submit an excess emissions report to NYSDEC at the time the semiannual compliance report is submitted.

40 CFR 63.11098

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

40 CFR 63.6625 (f)

This condition reduces the emission of hazardous air pollutants by requiring existing emergency engines greater than or equal to 500 brake horsepower located at a major source of HAP emissions and existing emergency engines located at an area source of HAP emissions to install a non-resettable hour meter.

40 CFR 63.6640 (f)

This condition states the operation requirements for emergency engines.

40 CFR 63.6665

This regulation specifies which provisions of the General provisions (Subpart A of 40 CFR 63) apply to the owner or operators of stationary internal combustion engines at facilities with emissions of hazardous air pollutants.

40 CFR 63.Table (2) (d)

Operating Requirements for RICE engines.



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6 NYCRR 201-6.5 (a)

This section identifies state enforceable requirements for Title V permits.

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 212-1.5 (e) (2)

A process emission source subject to the Federal National Emission Standards for Hazardous Air Pollutants (NESHAP) satisfies the requirements of Part 212 for the respective air contaminant regulated by the Federal standard.

However, NESHAPs regulating High Toxicity Air Contaminants (HTACs) must provide evidence that the maximum offsite ambient air concentration is less than the AGC/SGC and that emissions are less than the PB trigger for the respective air contaminant.

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 225-3.3 (a)

RVP must not be greater than 9.0 psi between May 1st and September 15th of each year.

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 229.3 (a)

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

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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 (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.

6 NYCRR 230.4 (a) (1)

Transport vehicle must be able to sustain the specified pressure change during loading and unloading of gasoline.

6 NYCRR 230.4 (b)

Gasoline Transport vehicles must be pressure-vacuum tested annually using an acceptable method to insure vapor tight integrity. USEPA has published Method 27.

6 NYCRR 230.4 (e)

Conditions under this rule citation specify the limits on leakage from the gasoline transport vehicle and vapor collection and control system during loading or unloading.

6 NYCRR 230.4 (f)

Gasoline transport vehicles must be loaded in accordance to the pressures in the regulation to insure vapor tight integrity.

6 NYCRR 230.4 (g)

Dome covers on gasoline transport vehicles must be closed while vehicle is being loaded, unloaded or in motion.

6 NYCRR 230.6 (a)

Owner of any gasoline transport vehicle must maintain records of pressure-vacuum testing and repairs. This rule specifies the types of records.

6 NYCRR 230.6 (b)

A copy of the most recent pressure-vacuum test repairs must be kept with the transport vehicle. By contrast, the records required by 230.6(a) are NOT required to be kept in the vehicle.

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6 NYCRR Subpart 201-7

This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit that cap is on gasoline and distillates thruput to ensure HAP emissions remain below the applicability thresholds of 40 CFR 63 subpart R

**Compliance Certification**

**Summary of monitoring activities at SUNOCO SYRACUSE TED PARK TERMINAL:**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Cond No.</b>	<b>Type of Monitoring</b>
---		
1-TANKS	85	record keeping/maintenance procedures
1-TANKS	86	record keeping/maintenance procedures
1-TANKS	87	record keeping/maintenance procedures
1-TANKS	88	record keeping/maintenance procedures
1-TANKS	89	record keeping/maintenance procedures
1-RACKS/-/RGS	72	record keeping/maintenance procedures
1-RACKS/-/RGS	76	record keeping/maintenance procedures
1-RACKS/-/RGS	77	record keeping/maintenance procedures
1-RACKS/-/RGS	78	record keeping/maintenance procedures
1-RACKS/-/RGS	79	monitoring of process or control device parameters as surrogate
1-RACKS/-/RGS	80	record keeping/maintenance procedures
1-RACKS/-/RGS	81	record keeping/maintenance procedures
1-RACKS/-/RGS	82	record keeping/maintenance procedures
1-RACKS	61	record keeping/maintenance procedures
1-TANKS	90	record keeping/maintenance procedures
1-RACKS	62	record keeping/maintenance procedures
FACILITY	38	record keeping/maintenance procedures
1-RACKS	63	intermittent emission testing
1-RACKS	65	record keeping/maintenance procedures
1-RACKS	66	record keeping/maintenance procedures
1-RACKS	67	record keeping/maintenance procedures
1-RACKS	68	record keeping/maintenance procedures
1-RACKS	69	record keeping/maintenance procedures
1-RACKS	70	record keeping/maintenance procedures
FACILITY	40	record keeping/maintenance procedures
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
1--GENR	52	record keeping/maintenance procedures
1--GENR	53	record keeping/maintenance procedures
1--GENR	51	record keeping/maintenance procedures
1-RACKS/-/RGS	71	intermittent emission testing
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	23	monitoring of process or control device parameters as surrogate
FACILITY	24	monitoring of process or control device parameters as surrogate
FACILITY	25	monitoring of process or control device parameters as surrogate
FACILITY	26	monitoring of process or control device parameters as surrogate

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FACILITY	7	record keeping/maintenance procedures
1-RACKS	95	record keeping/maintenance procedures
FACILITY	28	work practice involving specific operations
FACILITY	29	record keeping/maintenance procedures
FACILITY	30	record keeping/maintenance procedures
1-TANKS	83	record keeping/maintenance procedures
FACILITY	32	record keeping/maintenance procedures
1-RACKS	54	monitoring of process or control device parameters as surrogate
1-RACKS	55	intermittent emission testing
1-RACKS	57	monitoring of process or control device parameters as surrogate
1-RACKS	59	record keeping/maintenance procedures
1-RACKS	60	record keeping/maintenance procedures

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**Basis for Monitoring**

6NYCRR 225-3.3(a) – RVP must be no greater than 9.0 psi between May 1<sup>st</sup> and September 15<sup>th</sup>.

-Facility begins accepting lower RVP gasoline in advance of May 1<sup>st</sup> as temperature rises and samples gasoline blend to confirm RVP.

6NYCRR 229.5(c) – Gasoline terminals with a thruput greater than 20,000 gallons must record daily gasoline thruput and keep records for 5 years.

-Facility’s computer systems automatically record each truck loaded.

40 CFR 63.11089 – Monthly leak inspections using sight, smell and sound. Any leak detected must attempt to repair within 5 days and complete within 15 days and keep records of each incident.

- Facility performs these monthly detections and keeps logs on site.

40 CFR 63.11092(b)(1)(i)(‘B’)(‘1’) – As an alternative to installing a continuous emissions monitoring system, the facility must conduct annual testing of the carbon bed activity for the butane working capacity.

- Facility’s vender performs annual carbon bed testing.

40 CFR 63.11092(b)(1)(i)(‘B’)(‘1’) – As an alternative to installing a continuous emissions monitoring system, the facility must conduct monthly measurements of the VOC concentration over the last 5 minutes of an adsorption cycle for each carbon bed documenting the highest measured VOC concentration.

- Facility performs monthly measurements and keeps records on-site.

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40 CFR 63.11092(b)(1)(i)(‘B’)(‘1’) – As an alternative to installing a CEMS, the facility must observe one complete regeneration cycle for the carbon adsorption unit and record highest vacuum level achieved.

- Facility performs daily vacuum observation and recording.

40 CFR 60.502(b) – Emissions from each VRU are not to exceed 35 mg/l. Once per permit term the facility must test each VRU to ensure compliance with this limit. Each test must be at least 6-hrs in duration and at least 300,000 liters of gasoline must be loaded.

This limit is more stringent than the VOC limit specified under 40 CFR 63 subpart BBBBBB 63.11092(a) of 80 mg/L. The leak detection threshold of 500 ppm specified under BBBBBB is more stringent than specified under 40 CFR 60 XX. The leak detection procedures specified under 40 CFR 63 BBBBBB must be followed during emissions testing.

This limit of 35mg/L has been superceded by a more stringent VOC limit specified under 6NYCRR 200.6 of 10 mg/L. This limit was used in the calculations of facility wide PTEs and is to ensure the facility remains in compliance with new york state's guideline concentrations for benzene.

- Facility performed test for previous permit term in June 2017.

6NYCRR 201-7 - Facility must monitor and record gasoline and distillates thrupt to ensure they remain below the thrupt caps. These caps are in place to ensure HAP emissions from the facility remain below the applicability thresholds in 40 CFR 63 subpart R.

CAM - 6NYCRR 225-3.3(a) – RVP must be no greater than 9.0 psi between May 1<sup>st</sup> and September 15<sup>th</sup>.

-Facility begins accepting lower RVP gasoline in advance of May 1<sup>st</sup> as temperature rises and samples gasoline blend to confirm RVP.

6NYCRR 229.5(c) – Gasoline terminals with a thrupt greater than 20,000 gallons must record daily gasoline thrupt and keep records for 5 years.

-Facility’s computer systems automatically record each truck loaded.

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40 CFR 63.11089 – Monthly leak inspections using sight, smell and sound. Any leak detected must attempt to repair within 5 days and complete within 15 days and keep records of each incident.

- Facility performs these monthly detections and keeps logs on site.

40 CFR 63.11092(b)(1)(i)(‘B’)(‘1’) – As an alternative to installing a continuous emissions monitoring system, the facility must conduct annual testing of the carbon bed activity for the butane working capacity.

- Facility’s vender performs annual carbon bed testing.

40 CFR 63.11092(b)(1)(i)(‘B’)(‘1’) – As an alternative to installing a continuous emissions monitoring system, the facility must conduct monthly measurements of the VOC concentration over the last 5 minutes of an adsorption cycle for each carbon bed documenting the highest measured VOC concentration.

- Facility performs monthly measurements and keeps records on-site.

40 CFR 63.11092(b)(1)(i)(‘B’)(‘1’) – As an alternative to installing a CEMS, the facility must observe one complete regeneration cycle for the carbon adsorption unit and record highest vacuum level achieved.

- Facility performs daily vacuum observation and recording.

40 CFR 60.502(b) – Emissions from each VRU are not to exceed 35 mg/l. Once per permit term the facility must test each VRU to ensure compliance with this limit. Each test must be at least 6-hrs in duration and at least 300,000 liters if gasoline must be loaded.

This limit is more stringent than the VOC limit specified under 40 CFR 63 subpart BBBBBB 63.11092(a) of 80 mg/L. The leak detection threshold of 500 ppm specified under BBBBBB is more stringent than specified under 40 CFR 60 XX. The leak detection procedures specified under 40 CFR 63 BBBBBB must be followed during emissions testing.

This limit of 35mg/L has been superceded by a more stringent VOC limit specified under 6NYCRR 200.6 of 10 mg/L. This limit was used in the calculations of facility wide PTEs and is to ensure the facility remains in compliance with new york state's guideline concentrations for benzene.

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- Facility performed test for previous permit term in June 2017.

6NYCRR 201-7 - Facility must monitor and record gasoline and distillates thruput to ensure they remain below the thruput caps. These caps are in place to ensure HAP emissions from the facility remain below the applicability thresholds in 40 CFR 63 subpart R.

**CAM applicability** - CAM is not required for compliance with emission standards promulgated after November 15, 1990; the presumption is that EPA's post-1990 standards have CAM-level monitoring included. This facility is subject to 40 CFR 60, Subpart BBBBBB, promulgated in 2008. While the facility is also subject to a limit that is more stringent than 6B, following the procedures in 6B should also satisfy the requirements of CAM.

### Applicability Determinations

**40 CFR 63 ZZZZ:** This subpart applies to Emission unit: 1—GENR, Process: DSL, and Emission Source GENR1. It consists of one (1) 1,130 bhp diesel fired engine and electrical generator. The genset is subject to provisions for an existing, emergency CI RICE greater than 500 hp.

**40 CFR 60 Kb:** This subpart applies to Emission Unit 1-TANKS, Process: GAS, Emission Sources: T2301, T2302, T2303, T2306, T2313, T2315, T2316, and T2317. This emission unit was created for tanks storing higher vapor pressure volatile organic liquids. Subpart Kb applies to VOL storage tanks with volumes greater than 151 cubic meters (39,890 gallons) which commenced construction after 1984. Sunoco Syracuse TED Park Terminal was built in 1990. The tanks in this emission unit are equipped with internal floating roofs along with mechanical shoes in order to meet the roof/seal requirements of this subpart. This roof/seal configuration is subject to the roof inspection requirements under 60.113b(a)(2) which requires an initial roof hatch inspect at least annually after the initial fill. Under 60.113b(a)(4), at a minimum of once every 10 years, each tank must be removed from service, emptied, degassed and a thorough inspection of the IFR performed. The facility must make any necessary repairs and notify the Department 30 days prior to refilling.

**40 CFR 63: BBBBBB:** Applies to a bulk gasoline terminal that is not subject to the control requirements of 40 CFR part 63, subpart R (§§63.422, 63.423, and 63.424) or 40 CFR part 63, subpart CC (§§63.646, 63.648, 63.649, and 63.650). The facility has capped their HAP emissions below the major source thresholds in order to avoid triggering the requirements of 40 CFR 63 subpart R as well as 40 CFR 63: CC. The

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facility does not perform any petroleum refining operations. The maximum daily thruput well exceeds the 20,000 gallon/day threshold thus is subject to 40 CFR 63: BBBB under 63.11081(g).

The storage tank provisions of this subpart apply to Emission Unit 1-TANKS, Process: GAS, Emission Sources: T2301, T2302, T2303, T2306, T2313, T2315, T2316, and T2317. The gasoline storage tanks meet the requirements of 40 CFR 60: Kb thus satisfying the requirements of this subpart under 40 CFR 63: BBBB.

This subpart also applies the gasoline loading racks EU: 1-RACKS, Process: RDS, Emissions controls: VADEY (aka VRU2), VAPBC (aka VRU1) which are the controls for the corresponding gasoline loading emissions sources: GADEY and GASBC. The loading racks and vapor recovery unit are subject to limit of 80 milligram TOC per liter of gasoline loaded. This limit is less stringent than both the 35 mg/l TOC limit imposed by 40 CFR 60 XX and NY State's 10 mg/l TOC limit specified under 6NYCRR 200.6.

The fugitive emissions of this subpart apply to EU:1-RACKS, Process TTV and Process VRU This includes emission controls VADEY (VRU2), VAPBC (VRU1) which are the controls for emission sources GADEY and GASBC.

**40 CFR 60: XX:** The facility is subject to this subpart because it is classified as a bulk gasoline terminal which commenced construction after December 17, 1980. Sunoco Syracuse TED Park was built in 1990. The Facility meets the definition of bulk gasoline terminal as it has a gasoline thruput greater than 75,700 liters per day (20,000 gal/day).

This subpart requires emissions from the vapor collection system due to loading of liquid product into gasoline tank trucks to not exceed 35 milligrams TOC per liter of gasoline loaded under 60.502(b). This limit is superseded by a more stringent limit under 6NYCRR 200.6 of 10 milligrams TOC per liter of gasoline loaded. Each performance test must be at 6 hours long during which 300,000 liters of gasoline is loaded. A condition was added under 6NYCRR 200.6 which matches the testing requirements language under 40 CFR 60.502 only with a 10 mg TOC/l limit. The loading racks consists of EU: 1-RACKS, Process: RDS, Emissions controls: VADEY (aka VRU2), VAPBC (aka VRU1) which are the controls for the corresponding gasoline loading emissions sources: GADEY and GASBC.