

**Division of Air Resources
Permit Review Report**

Permit ID: 9-1464-00132/00019
Renewal Number: 3
01/19/2022

Facility Identification Data

Name: SUNOCO TONAWANDA TERMINAL
Address: 3733 RIVER RD
TONAWANDA, NY 14150

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: MICHELLE R WOZNICK
Address: NYSDEC - REGION 9
270 MICHIGAN AVE
BUFFALO, NY 14203-2915
Phone: 7168517165

Division of Air Resources:
Name: ALAN J ZYLINSKI
Address: NYSDEC - REGION 9
270 MICHIGAN AVE
BUFFALO, NY 14203-2915
Phone: 7168517130

Air Permitting Contact:
Name: Stanley Gasorowski
Address: Sunoco Tonawanda Terminal
3733 River Rd
Tonawanda, NY 14150
Phone: 7164824681

**Permit Description
Introduction**

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

Summary Description of Proposed Project

Application for renewal of Air Title V Facility.

Attainment Status

**Division of Air Resources
Permit Review Report**

Permit ID: 9-1464-00132/00019

Renewal Number: 3

01/19/2022

SUNOCO TONAWANDA TERMINAL is located in the town of TONAWANDA in the county of ERIE. 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*	MARGINAL 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:

Sunoco Partners Marketing & Terminals L.P. (Sunoco) owns and operates the Tonawanda Terminal located at 3733 River Road, Tonawanda, Erie County, New York. This permit is the Title V Renewal Permit for Sunoco Partners Tonawanda Terminal. The Tonawanda Terminal is a bulk marketing terminal for distributing gasoline, diesel fuel and ethanol. The facility is subject to 6 NYCRR Part 201-6, Title V Permits, for major stationary sources due to potential emissions of volatile organic compounds (VOC) in excess of 50 tons per year. The facility is also subject to 40 CFR Part 63 BBBB. Facility emissions include fugitive emissions from the above ground storage tanks and the truck loading operations that are vented through vapor control devices. Sunoco will continue to restrict the emissions of hazardous air pollutants (HAP) to below the 40 CFR Part 63 Subpart R threshold of 10 tons per year of any individual HAP and 25 tons per year of all HAP compounds combined. To accomplish this, facility throughput will be limited to 456,000,000 gallons of gasoline and 193,000,000 gallons of distillates in any 12 consecutive month period.

The terminal facility includes a tank farm to hold product. There are six (6) storage tanks of different volumes that are in gasoline service, one (1) storage tank in ethanol service, one (1) storage tank in distillate service, two (2) storage tanks in additive service, one (1) storage tank in low sulfur diesel service and one (1) storage tank in transmix service.

The terminal facility also includes tank truck loading racks for product distribution, a garage, an oil water separator, a vapor combustion unit and a vapor recovery unit for treatment of vapors collected from loading and receipt of product, rail car unloading rack for ethanol and pipeline manifold for receipt of product and offices. All petroleum products enter the terminal either via pipeline or rail car and are distributed from the facility by tank truck. All product tanks are welded steel above ground tanks contained within an earthen berm. The above ground tanks are inspected daily, weekly, and monthly as part of the standard terminal operating procedures. Tanks are periodically removed from service, cleaned, inspected and repaired as necessary. Underground tanks are used as knock out tanks for the VRU and the pipeline.

**Division of Air Resources
Permit Review Report**

**Permit ID: 9-1464-00132/00019
Renewal Number: 3
01/19/2022**

Permit Structure and Description of Operations

The Title V permit for SUNOCO TONAWANDA 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.

SUNOCO TONAWANDA TERMINAL is defined by the following emission unit(s):

Emission unit 1RACKS -

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

00013

Process: RDS

Process: RGS

Process: TTV

Process: VCL

Process: VRU

Emission unit 1TANKS -

Process: FG1

Process: GAS

Emission unit 1MISCT -

Title V/Major Source Status

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

This facility is considered a major source because the facility's potential to emit VOC emissions is greater than the major facility threshold of 50 tons per year.

**Division of Air Resources
Permit Review Report**

Permit ID: 9-1464-00132/00019
Renewal Number: 3
01/19/2022

Program Applicability

The following chart summarizes the applicability of SUNOCO TONAWANDA 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	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.

**Division of Air Resources
Permit Review Report**

Permit ID: 9-1464-00132/00019
Renewal Number: 3
01/19/2022

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 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

3273	READY-MIXED CONCRETE
4226	SPECIAL WAREHOUSING & STORAGE
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
4-04-001-52	Valves, Flanges, and Pumps BULK TERMINALS/PLANTS

**Division of Air Resources
Permit Review Report**

**Permit ID: 9-1464-00132/00019
Renewal Number: 3
01/19/2022**

4-04-001-53	BULK TERMINALS Vapor Collection Losses BULK TERMINALS/PLANTS
4-04-001-54	BULK TERMINALS Vapor Control Unit Losses BULK TERMINALS/PLANTS
4-04-001-60	BULK TERMINALS Tank Truck Vapor Leaks BULK TERMINALS/PLANTS
4-04-002-50	BULK TERMINALS INTERNAL FLOAT ROOF W/ PRIMARY SEAL-SPECIFY LIQUID:STANDING LOSS BULK TERMINALS/PLANTS
4-06-888-01	BULK PLANTS Loading Racks TRANSPORTATION AND MARKETING OF PETROLEUM PRODUCTS TRANSPORTATION AND MARKETING OF PETROLEUM PRODUCTS - FUGITIVE EMISSION Specify in Comments Field

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				
000098-82-8	BENZENE, (1-METHYLETHYL)				
000630-08-0	CARBON MONOXIDE				
000100-41-4	ETHYLBENZENE				
000110-54-3	HEXANE				
007439-92-1	LEAD				
001634-04-4	METHYL TERTBUTYL ETHER				
000091-20-3	NAPHTHALENE				
0NY210-00-0	OXIDES OF NITROGEN				
0NY075-00-0	PARTICULATES				
0NY075-00-5	PM-10				

**Division of Air Resources
Permit Review Report**

**Permit ID: 9-1464-00132/00019
Renewal Number: 3
01/19/2022**

007446-09-5	SULFUR DIOXIDE	
000108-88-3	TOLUENE	
0NY100-00-0	TOTAL HAP	49900
0NY998-00-0	VOC	
001330-20-7	XYLENE, M, O & P MIXT.	

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.

- 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

**Division of Air Resources
Permit Review Report**

Permit ID: 9-1464-00132/00019

Renewal Number: 3

01/19/2022

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;
- 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.

**Division of Air Resources
Permit Review Report**

**Permit ID: 9-1464-00132/00019
Renewal Number: 3
01/19/2022**

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, 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

**Division of Air Resources
Permit Review Report**

**Permit ID: 9-1464-00132/00019
Renewal Number: 3
01/19/2022**

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 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	74	Powers and Duties of the Department with respect to air pollution control
1-TANKS	40CFR 60-A.4	67	General provisions - Address
1-TANKS	40CFR 60-A.7(b)	68	Notification and Recordkeeping
1-TANKS	40CFR 60-A.7(f)	69	Notification and

**Division of Air Resources
Permit Review Report**

**Permit ID: 9-1464-00132/00019
Renewal Number: 3
01/19/2022**

1-TANKS/-/GAS/00012	40CFR 60-K.112 (a)	73	Recordkeeping Petroleum liquid storage tanks over 40,000 gallons capacity - standard for VOC
FACILITY	40CFR 60-K.113 (a)	43	Petroleum liquid storage tanks over 40,000 gallons capacity - monitoring of operations
1-TANKS	40CFR 63-BBBBBB.11087	70	NESHAP for Area Source Gasoline Bulk Terminals - Requirements for Tanks
1-RACKS	40CFR 63-BBBBBB.11088	58	NESHAP for Area Source Bulk Gasoline Terminals - Requirements for Loading Racks
FACILITY	40CFR 63-BBBBBB.11089	44	NESHAP for Area Source Gasoline Bulk Terminals - Equipment Leak Inspections
1-RACKS	40CFR 63- BBBBBB.11092 (a)	59	NESHAP for Area Source Gasoline Bulk Terminals - Testing and Monitoring Provisions
1-RACKS	40CFR 63- BBBBBB.11092 (b)	60	NESHAP for Area Source Gasoline Bulk Terminals - Testing and Monitoring Provisions
1-RACKS	40CFR 63- BBBBBB.11092 (b)	61	NESHAP for Area Source Gasoline Bulk Terminals - Testing and Monitoring Provisions
1-RACKS	40CFR 63- BBBBBB.11092 (b)	62	NESHAP for Area Source Gasoline Bulk Terminals - Testing and Monitoring Provisions
1-RACKS	40CFR 63- BBBBBB.11092 (b)	63	NESHAP for Area Source Gasoline Bulk Terminals - Testing and Monitoring Provisions
1-RACKS	40CFR 63- BBBBBB.11092 (c)	64	NESHAP for Area Source Gasoline Bulk Terminals - Change to Operating Parameter
1-RACKS	40CFR 63- BBBBBB.11092 (d)	65	NESHAP for Area Source Gasoline Bulk Terminals - Operation of Vapor Processing System
1-TANKS	40CFR 63- BBBBBB.11092 (e)	71	NESHAP for Area Source Gasoline Bulk Terminals - Inspections of gasoline storage tanks

**Division of Air Resources
Permit Review Report**

**Permit ID: 9-1464-00132/00019
Renewal Number: 3
01/19/2022**

FACILITY	40CFR 63-BBBBBB.11093	45	NESHAP for Area Source Gasoline Bulk Terminals -
1-TANKS	40CFR 63-BBBBBB.11094 (a)	72	Notifications NESHAP for Area Source Gasoline Bulk Terminals -
FACILITY	40CFR 63-BBBBBB.11094 (b)	46	Recordkeeping Requirements NESHAP for Area Source Gasoline Bulk Terminals -
FACILITY	40CFR 63-BBBBBB.11094 (c)	47	Recordkeeping NESHAP for Area Source Gasoline Bulk Terminals -
FACILITY	40CFR 63-BBBBBB.11094 (d)	48	Recordkeeping NESHAP for Area Source Bulk Gasoline Terminals -
FACILITY	40CFR 63-BBBBBB.11094 (e)	49	Recordkeeping NESHAP for Area Source Gasoline Bulk Terminals -
FACILITY	40CFR 63-BBBBBB.11094 (f)	50	Recordkeeping NESHAP for Area Source Gasoline Bulk Terminals -
FACILITY	40CFR 63-BBBBBB.11095 (a)	51	Recordkeeping NESHAP for Area Source Gasoline Bulk Terminals -
FACILITY	40CFR 63-BBBBBB.11095 (b)	52	Reporting NESHAP for Area Source Gasoline Bulk Terminals -
FACILITY	40CFR 63-BBBBBB.11095 (c)	53	Reporting NESHAP for Area Source Gasoline Bulk Terminals -
FACILITY	40CFR 63-BBBBBB.11098	54	Reporting NESHAP for Area Source Gasoline Bulk Terminals -
FACILITY	40CFR 68	18	General Provisions 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	75	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

**Division of Air Resources
Permit Review Report**

**Permit ID: 9-1464-00132/00019
Renewal Number: 3
01/19/2022**

FACILITY	6NYCRR 201-6	20, 55, 56	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
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
FACILITY	6NYCRR 201-6.4 (d) (4)	21	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4 (e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.4 (f)	22	Operational Flexibility
FACILITY	6NYCRR 201-6.5 (a)	76	State Enforceable Requirements
FACILITY	6NYCRR 201-7.1	23	Emission Capping in Facility Permits
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	77	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	28	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 212-1.5 (d)	29	BACT or T-BACT for process emission sources
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
FACILITY	6NYCRR 225-3.3 (a)	30	RVP Limitation - May 1st through September 15th
FACILITY	6NYCRR 225-3.4 (a)	31	Gasoline records to be maintained
FACILITY	6NYCRR 225-3.4 (b)	32	Records to be provided with distributed gasoline
FACILITY	6NYCRR 225-3.4 (d)	33	Maintenance and availability of gasoline records
1-TANKS	6NYCRR 229.3 (a)	66	Petroleum fixed roof tank control requirements
1-RACKS	6NYCRR 229.3 (d) (1)	57	Gasoline loading terminals
FACILITY	6NYCRR 229.3 (d) (2)	34	Gasoline loading

**Division of Air Resources
Permit Review Report**

**Permit ID: 9-1464-00132/00019
Renewal Number: 3
01/19/2022**

FACILITY	6NYCRR 229.4 (a)	35	terminals Testing and monitoring
FACILITY	6NYCRR 229.5 (a)	36	Recordkeeping - petroleum liquid fixed roof storage tanks
FACILITY	6NYCRR 229.5 (c)	37	Recordkeeping - gasoline loading terminals
FACILITY	6NYCRR 230.4 (a)	38	Gasoline dispensing site recordkeeping requirements
FACILITY	6NYCRR 230.6 (a)	39	Gasoline transport vehicle prohibition
FACILITY	6NYCRR 230.6 (b)	40	Gasoline transport vehicle requirements for transfer to Stage I tanks
FACILITY	6NYCRR 230.6 (c)	41	Gasoline transport vehicle and vapor recovery system vapor leaks
FACILITY	6NYCRR 230.6 (d)	42	Gasoline transport vehicle dome cover requirements

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)

**Division of Air Resources
Permit Review Report**

Permit ID: 9-1464-00132/00019

Renewal Number: 3

01/19/2022

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.

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

Division of Air Resources
Permit Review Report

Permit ID: 9-1464-00132/00019

Renewal Number: 3

01/19/2022

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 202-2.1

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

**Division of Air Resources
Permit Review Report**

Permit ID: 9-1464-00132/00019

Renewal Number: 3

01/19/2022

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, SUNOCO TONAWANDA TERMINAL has been determined to be subject to the following regulations:

40 CFR 60.112 (a)

This citation requires the use of a floating roof and vapor recovery system for petroleum liquids stored at certain vapor pressures.

40 CFR 60.113 (a)

This citation states the recordkeeping requirements for Subpart K.

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 60.7 (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 63.11087

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

**Division of Air Resources
Permit Review Report**

Permit ID: 9-1464-00132/00019

Renewal Number: 3

01/19/2022

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 (b) (1) (i) ('A')

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

40 CFR 63.11092 (b) (3)

States how to determine an operating parameter for the vapor processing and collection system.

40 CFR 63.11092 (b) (4)

Rationale for selected operating parameter value, monitoring frequency and averaging time.

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.

**Division of Air Resources
Permit Review Report**

**Permit ID: 9-1464-00132/00019
Renewal Number: 3
01/19/2022**

40 CFR 63.11092 (e) (1)

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 (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.

40 CFR 63.11094 (e)

This regulation states if the facility is subject to the requirements for equipment leak inspections in

**Division of Air Resources
Permit Review Report**

Permit ID: 9-1464-00132/00019

Renewal Number: 3

01/19/2022

§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 63.11094 (f)

This regulation requires the facility shall keep the following records: Keep an up-to-date, readily accessible record of the continuous monitoring data required under §63.11092(b) or §63.11092(e), record and report simultaneously with the Notification of Compliance Status required under §63.11093(b), keep an up-to-date, readily accessible copy of the monitoring and inspection plan required under §63.11092(b)(1)(i)(B)(2) or §63.11092(b)(1)(iii)(B)(2), keep an up-to-date, readily accessible copy of all system malfunctions, as specified in §63.11092(b)(1)(i)(B)(2)(v) or §63.11092(b)(1)(iii)(B)(2)(v).

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 63.11095 (c)

40 CFR 63.11098

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

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

**Division of Air Resources
Permit Review Report**

Permit ID: 9-1464-00132/00019

Renewal Number: 3

01/19/2022

prior to making any changes at the facility pursuant to this section.

6 NYCRR 201-6.5 (a)

This subdivision states that the Department shall include state enforceable conditions in Title V permits. State enforceable conditions related to regulations developed pursuant to the Climate Leadership and Community Protection Act (CLCPA) and Article 75 of New York State Environmental Conservation Law may be included in future versions of this permit, as applicable.

6 NYCRR 201-7.1

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

6 NYCRR 211.1

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

6 NYCRR 212-1.5 (d)

This provision allows for the department to specify a less restrictive permissible emission rate or degree of air cleaning for the process emission source or emission point than required under Subpart 212-2 in instances where a facility owner or operator can demonstrate to the satisfaction of the department that the facility owner will apply the Best Available Control Technology (BACT) for that criteria air contaminant or the Best Available Control Technology for a toxic air contaminant (T- BACT).

6 NYCRR 225-3.3 (a)

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.

**Division of Air Resources
Permit Review Report**

Permit ID: 9-1464-00132/00019

Renewal Number: 3

01/19/2022

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 (a)

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

6 NYCRR 229.3 (d) (1)

This regulation requires gasoline vapor collection and control systems subject to Part 229 to capture gasoline vapors during loading and unloading of gasoline transport vehicles, and condense, absorb, adsorb or combust the gasoline vapors so emissions do not exceed 0.67 pounds per 1,000 gallons of gasoline loaded or unloaded. The requirement allows equivalent control systems provided they are acceptable to the department. Test methods to determine the level of gasoline vapors which are acceptable to the commissioner must be used to determine compliance with this standard.

6 NYCRR 229.3 (d) (2)

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 (a)

This regulation requires that a record be of the capacities, in gallons, of petroleum liquid storage tanks subject to the control requirements for petroleum fixed roof and petroleum liquid external floating roof tanks under Part 229.3, be maintained at the facility for a period of 5 years.

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)

This citation states the recordkeeping requirements for gasoline dispensing sites.

6 NYCRR 230.6 (a)

This citation states the gasoline transport vehicle requirements to allow it to be filled or emptied in New York State.

**Division of Air Resources
Permit Review Report**

Permit ID: 9-1464-00132/00019
Renewal Number: 3
01/19/2022

6 NYCRR 230.6 (b)

This citation states the requirements for gasoline transport vehicles that transfer gasoline into a storage tank with a Stage I vapor recovery system.

6 NYCRR 230.6 (c)

This citation states the monitoring requirements and limit for vapor leaks from gasoline transport vehicles or vapor recovery systems.

6 NYCRR 230.6 (d)

This citation states the requirements for dome covers on gasoline transport vehicles.

Compliance Certification

Summary of monitoring activities at SUNOCO TONAWANDA TERMINAL:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring

FACILITY	43	record keeping/maintenance procedures
1-TANKS	70	record keeping/maintenance procedures
1-RACKS	58	intermittent emission testing
FACILITY	44	record keeping/maintenance procedures
1-RACKS	59	intermittent emission testing
1-RACKS	60	continuous emission monitoring (cem)
1-RACKS	61	record keeping/maintenance procedures
1-RACKS	62	record keeping/maintenance procedures
1-RACKS	63	record keeping/maintenance procedures
1-RACKS	64	record keeping/maintenance procedures
1-RACKS	65	record keeping/maintenance procedures
1-TANKS	71	record keeping/maintenance procedures
1-TANKS	72	record keeping/maintenance procedures
FACILITY	46	record keeping/maintenance procedures
FACILITY	47	record keeping/maintenance procedures
FACILITY	48	record keeping/maintenance procedures
FACILITY	49	record keeping/maintenance procedures
FACILITY	50	record keeping/maintenance procedures
FACILITY	51	record keeping/maintenance procedures
FACILITY	52	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	24	monitoring of process or control device parameters as surrogate
FACILITY	25	monitoring of process or control device parameters as surrogate
FACILITY	26	work practice involving specific operations
FACILITY	27	work practice involving specific operations
FACILITY	7	record keeping/maintenance procedures
FACILITY	29	record keeping/maintenance procedures
FACILITY	30	work practice involving specific operations
FACILITY	31	record keeping/maintenance procedures

**Division of Air Resources
Permit Review Report**

Permit ID: 9-1464-00132/00019

Renewal Number: 3

01/19/2022

FACILITY	32	record keeping/maintenance procedures
FACILITY	33	record keeping/maintenance procedures
1-RACKS	57	intermittent emission testing
FACILITY	36	record keeping/maintenance procedures
FACILITY	37	record keeping/maintenance procedures
FACILITY	38	record keeping/maintenance procedures
FACILITY	39	record keeping/maintenance procedures
FACILITY	40	record keeping/maintenance procedures
FACILITY	41	monitoring of process or control device parameters as surrogate
FACILITY	42	record keeping/maintenance procedures

Basis for Monitoring

This is a renewal permit. There are no changes to the facility.

Most of the monitoring requirements contained in this permit are based on specific monitoring methods and observations as prescribed in the applicable rules. Facility specific monitoring conditions were written to assure that reliable information is obtained representing the facility's compliance status for the following issues:

HAPs (Hazardous Air Pollutants)

Specific conditions were written to limit the HAP emissions from Sunoco's Tonawanda Terminal to less than 10 tons per year individually and 25 tons per year totally to prove that the facility emissions remain below the applicability of the National Emission Standards for Gasoline Distribution Facilities. This will be accomplished by monitoring the HAP emissions on a 12-month rolling total basis. In addition, the facility has accepted throughput limitations for gasoline and distillate oil.

VOCs (Volatile Organic Compounds)

The facility is subject to 6 NYCRR Part 201-6, Title V Permits, for major stationary sources due to potential emissions of volatile organic compounds (VOC) in excess of 50 tons per year. Facility emissions include fugitive emissions from the above ground storage tanks and the truck loading operations that are vented through vapor control devices.

CAM (40 CFR Part 64) does not apply to this facility because it is subject to NSPS/NESHAP rules.