



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 2-6101-00055/00021
Mod 0 Effective Date: 01/05/2006 Expiration Date: 01/04/2011
Mod 1 Effective Date: 08/15/2006 Expiration Date: 01/04/2011
Mod 2 Effective Date: 08/24/2010 Expiration Date: 01/04/2011

Permit Issued To: BP PRODUCTS NORTH AMERICA INC
28100 TORCH PKWY
WARRENVILLE, IL 60555

Contact: ROBERT TWORKOWSKI
BP PRODUCTS NORTH AMERICA
801 EAST ORDNANCE ROAD
CURTIS BAY, MD 21226
(410) 636-0522

Facility: BP PRODUCTS N AMERICA BROOKLYN TERMINAL
125 APOLLO ST
BROOKLYN, NY 11222

Contact: ERIC W SAUERMAN
BP PRODUCTS NORTH AMERICA
125 APOLLO ST
BROOKLYN, NY 11222
(718) 389-5966

Description:

PERMIT DESCRIPTION
BP PRODUCTS N AMERICA BROOKLYN TERMINAL
DEC ID # 2-6101-00055/00021 (Ren 1, Mod 2)

This project is a minor modification to existing Title V permit. BP Products North America Inc. is proposing the following project at their Brooklyn Terminal:

1. To convert existing Tank #8 from a fixed roof tank (Emission Source TK08P) containing kerosene which services the distillate loading rack to an internal floating roof tank (Emission Control TK08C) containing gasoline which will service the gasoline loading rack, and



2. To install a new 4,000 gallons horizontal tank (Tank #41) containing fuel additives - xylene (which will service the gasoline loading rack). This tank is exempt from permitting according to 6 NYCRR 201-3.2(c)(26).

The proposed modification will reduce the number of daily tank fills required to operate the Brooklyn Terminal allowing for additional operational flexibility and enhanced operational safety.

These proposed changes are described in detail and result in modification to Emission Unit U-TANKS only. This project meets the minor modification criteria outlined below according to 6 NYCRR 201-6.7(c) - minor permit modification because the project does not:

- i. Violate any applicable requirement;
- ii. involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit and are not otherwise a significant change in the permit; (i.e. All of the applicable requirements that affect the modified tank #8 are already in the permit and tank #8 will be associated with these existing requirements. No new applicable requirements will be added to the permit);
- iii. require or change a case-by-case determination of a federal emission limitation or other federal standard, or a specific determination for portable sources causing adverse ambient impacts, or a visibility or increment analysis;
- iv. seek to establish or change a permit term or condition that the facility has assumed to avoid an applicable requirement to which the emission source would otherwise be subject; or
- v. are not modifications under any provisions of Title I of the Act, including modifications resulting in significant net emission increases as defined and regulated under Part 231 of this Title.

Non-Attainment NSR Applicability: The BP Brooklyn Terminal is currently an existing major facility for VOC. For each regulated NSR contaminant, the project emission potential is determined only for modifications at existing facilities. The project emission potential must consider only the proposed emission increases, and for existing emission sources at a major facility, it is calculated as the difference between the baseline actual emissions and the projected actual emissions of the emission source. Or, for new emission sources, as the sum of the potential to emit of each emission source. The baseline period established for the Brooklyn Terminal is May 2005 through



April 2007. The baseline period is defined as any 24 consecutive months within the 5 years immediately preceding the date of commencement.

The conversion of Tank #8 from a fixed roof tank containing kerosene to an internal floating roof tank containing gasoline and the installation of a new 4,000 gallons horizontal tank containing fuel additives (xylene) at the Brooklyn Terminal results in a "Project Emission Potential" (PEP) of 2.2 TPY. These proposed changes result in a minor modification to emission unit U-TANKS only. For the Brooklyn Terminal to be subject to New Source Review permitting obligations, this project would need to have a PEP of greater than 2.5 TPY VOC (the significant project threshold for severe non-attainment areas). The demonstrated PEP (2.20 TPY) is less than 2.5 TPY and is not subject to Part 231.5 NSR permitting.

The proposed project must exceed the significant source project threshold of 2.5 TPY VOC to trigger NSR program applicability. The calculations summarized below demonstrate that the future potential emissions, less prior actual emissions, are below the NSR program applicability threshold of 2.5 TPY VOC.

Baseline Actual Emissions:

Baseline Actual Average (May 2005 - april 2007) = Tank #8 + Gasoline Loading Rack Fugitives + Vapor Recovery Unit = 0.17 + 8.95 + 0.88 = 10.00 TPY of VOC

Projected Actual Emissions are defined as the maximum annual rate, in TPY, at which an existing emission source is projected to emit a regulated NSR contaminant in any one of the five years (12-month period) after a modification. Projected Actual Emissions for sources within the project boundary are presented as follows:

Projected Actual Emissions = Tank #8 + Gasoline Loading Rack Fugitives + Vapor Recovery Unit + Tank #41 = 1.53 + 10.36 + 0.30 + 0.01 = 12.20 TPY of VOC

Major Nonattainment NSR Applicability Calculation:

Project Emission Potential = Projected Actual Emissions - Baseline Actual Emissions =
= 12.20 - 10.00 = 2.20 of VOC

Since the demonstrated PEP (2.20 TPY) is less than the NSR program applicability threshold of 2.5 TPY of VOC, therefore; the project is not subject



to Part 231.5 NSR permitting.

The BP Products North America Inc. petroleum bulk storage terminal is located at 125 Apollo Street in Brooklyn, Kings County, New York. The facility is adjacent to the south side of Newtown Creek and is approximately 1,000 feet southeast of the Greenpoint Avenue bridge. The geographic coordinates at: latitude 40 degrees 43'43" and longitude 73 degrees 56'20".

The facility consists of eleven (11) bulk petroleum storage tanks, six (6) smaller tanks (additives, slop, etc.), a four-bay gasoline truck loading rack, a six-bay distillate truck loading rack, and two (2) vapor recovery units. The terminal receives petroleum products via marine transport vessels and pipeline and distributes petroleum products via transport tanker trucks. Volatile Organic Compounds (VOCs) emitted during transport tanker truck loading are controlled by one of the two John Zink Carbon Adsorption/Absorption vapor recovery units. The facility also has two (2) small office buildings with a one-story warehouse. The warehouse stores containers of non-petroleum products plus miscellaneous cleaning and maintenance supplies.

The facility is a bulk terminal with two truck loading racks to load gasoline, distillates, denatured ethanol and additives into truck tanks. This facility stores gasoline, distillates, denatured ethanol, and gasoline additives prior to distribution. Product is received via pipeline, truck and barge. Product is distributed via truck.

Application to renew existing Title V permit. In this application, BP Products North America Inc. (BP) is requesting an increase to the loading rack throughput limit. BP is proposing to renew the existing Title V permit for the facility located at 125 Apollo Street in Brooklyn. As part of this application, BP is proposing to redefine the facility emission units. BP requests to do this in order to increase the flexibility of the facility. For example, the current permit contains emission limits for each tank onsite. If BP chooses to maintain a tank out of service for a year, the current permit does not allow BP to transfer those emissions to the other tanks which are in service. Identifying all of the tanks onsite as a single emission unit will allow BP flexibility in tank utilization.

In Renewal #1, BP Products Brooklyn Terminal was granted an increase on the throughput limit of the gasoline loading rack. The previous permit limit was 400,000,000 gallons per year. BP was granted an increase to 600,000,000 gallons per year. In order to accommodate this, BP proposed to reduce the current vapor recovery unit emission limit to 10 mg/l of gasoline loaded from the current 20 mg/l of gasoline loaded. The most recent two stack tests (that of April 24, 2002 tested at 0.89 mg/l, and that of May 31, 2007 tested 0.26 mg/l)



indicating that the unit is operating at a level well below both the existing and proposed limits. The overall VOC emissions cap from the facility remains at 76.52 tons per year of VOC.

The liquids used in the application calculations represent the most volatile liquid in the class of liquids to be stored in the tank. For example, Tank # 1 is to store distillate products. Kerosene was used in the calculations due to its volatility. It represents the worst-case scenario for the volatility of the liquid stored in the tank. The use of kerosene in the calculations is in no way intended to be interpreted as a limit or restriction on the substance stored in the tank. BP requests the flexibility of storing any distillate product with a vapor pressure less than kerosene in Tanks # 1, # 32, # 14, # 27, and # 34.

The same is true of the gasoline tanks. RVP 13 gasoline was used as an annual average for the RVP of the gasoline stored at the facility. The use of RVP 13 gasoline in the calculations is in no way intended to be interpreted as a limit or restriction on the substance stored in the tank. As per federal guidelines, BP intends to store gasoline with RVP varying from 9-15 psi, as appropriate, throughout the year. Limiting that tanks to storing RVP 13 gasoline would effectively shut down the facility during the winter months. Regarding Tank # 5, the contents will remain as recovered product; however, RVP 13 gasoline was used in the calculations for the reasons stated above.

Control Equipment Description: The VRU is designed to process the VOC vapors vented from the four bay gasoline loading rack. The unit currently meets the permitted emissions limit of 20 milligrams of VOC vented per liter of gasoline loaded at the loading rack (i.e. 20 mg/l). As part of the renewal application, BP proposed a new emissions limit for the VRU. The proposed limit is 10 mg/l. The most recent stack tests (a performance test was conducted on April 24, 2002 and tested at 0.89 mg/l, and another performance test was conducted on May 31, 2007 and tested at 0.26 mg/l) indicates that the unit is operating at a level well below both the existing and proposed limits.

BP Products consists of three emission units: U-DRACK, U-GRACK, and U-GTANKS. Below is a description of each of these three emission units.

Emission Unit U-DRACK is defined as the distillate loading rack. The distillate rack consists of five (5) loading bays with a total of fourteen (14) loading arms. Products transferred through the loading rack include refined petroleum products with vapor pressures less than 5.1 kPa (0.74 psia).

Emission Unit U-DRACK consists of Emission Point DRACK, Process 006 and



Emission Source/Control DRACK.

Emission Unit U-GRACK is defined as the gasoline loading rack. The gasoline rack consists of four (4) loading bays with a total of fourteen (14) loading arms. Products transferred through the loading rack include refined petroleum products and ethanol with vapor pressure less than 76.6 kPa (11.1 paia). The emissions from the gasoline loading rack are controlled by a John Zinc Vapor Recovery Unit (primary or backup - Emission Sources/Controls 0AVRU, 0BVRU, 0OVRU and 0PVRU).

Emission Unit U-GRACK consists of Emission Point GRACK, Process 005 and Emission Sources/Controls 0AVRU, 0BVRU, 0OVRU and 0PVRU.

Emission Unit U-TANKS is defined as all of the above-ground storage tanks at the facility. There are nine (9) bulk tanks containing internal floating roofs, two (2) bulk cone roof tanks, and six (6) smaller horizontal tanks. Products stored within these tanks include refined petroleum products, ethanol, and fuel additives.

This emission unit consists of Emission Points 00001, 00002, 00003, 00004, 00005, 00006, 00007, 00008, 00009, 00010, 00014, 00027, 00032, 00034, 00035, 00036 & 00041 referring to each of the storage tanks, Processes 001, 002, 003 & 004, and Emission Sources/Controls TAN01, TK02C, TK02P, TK03C, TK03P, TK04C, TK04P, TK05C, TK05P, TK06C, TK06P, TK07C, TK07P, TK08C, TK08P, TK09C, TK09P, TK10C, TK10P, TAN14, TAN27, TAN32, TAN34, TAN35, TAN36 & TAN41.

The facility consists of eleven (11) active 40-foot tall aboveground storage tanks (Storage Tanks # 1, # 2, # 3, # 4, # 5, # 6, # 7, # 8, # 9, # 10 and # 32) surrounded by steel dike walls. Nine (9) of the eleven (11) tanks (Storage Tanks # 2, # 3, # 4, # 5, # 6, # 7, # 8, # 9 and # 10) are fitted with internal floating roofs and are therefore capable of storing Volatile Organic Compounds with vapor pressure less than 11.5 psia. One of the nine (9) tanks with an internal floating roof (Storage Tank # 5) serves the site's remediation system and stores recovered petroleum products. Two (2) of the tanks (Storage Tanks # 1 & # 32) are not fitted with internal floating roofs. Petroleum products are received into the storage tanks via pipeline and barge. Products are distributed by two truck loading racks, one with five (5) loading bays and the other with four (4). Volatile Organic Compound emissions from the truck loading operations are controlled by a carbon adsorption/absorption Vapor Recovery Unit.

The nine (9) tanks equipped with internal floating roofs and two (2) of the horizontal tanks are locally referred to as Tanks #2, # 3, # 4, # 5, # 6, # 7, # 8, #



9, # 10, # 35 and # 36. Tanks #2, # 3, # 4, # 5, # 6, # 7, #8, # 9, # 10, # 35 and # 36 will have the flexibility of being used to store refined petroleum products (gasoline and distillate) with a vapor pressure of less than or equal to 76.6 kPa (11.1 psia) and denatured ethanol within these tanks. All of the noted tanks, with the exception of horizontal Tanks #35 and 36, are equipped with an internal floating roof. Potential to emit (PTE) calculations for these tanks were done utilizing gasoline with an RVP of 13. RVP 13 gasoline was chosen to represent an average vapor pressure for the products to be stored within these tanks. This is not intended to be interpreted as a restriction on the products stored within these tanks. BP reserves the right to store any liquid with a vapor pressure of less than or equal to 76.6 kPa (11.1 psia) within these tanks.

The two (2) cone roof tanks are locally referred to as Tank #1 and Tank #32. Storage Tanks #1 and 32 will be used to store refined petroleum products with a vapor pressure of less than or equal to 5.1 kPa (0.74 psia). PTE calculations were performed using kerosene in order to represent a worst-case-scenario for the products stored within these tanks. This is not intended to be interpreted as a restriction on the products stored within these tanks. BP Products reserves the right to store any liquid with a vapor pressure of less than or equal to 5.1 kPa (0.76 psia) within these tanks.

The three (3) remaining horizontal tanks are locally referred to as Tank #14, # 27 and # 34. Tanks #14, # 27 and # 34 will be used to store fuel additives with a vapor pressure of less than or equal to 0.83 kPa (0.12 psia). PTE calculations were performed using xylene in order to represent a worst-case-scenario for the products stored within these tanks. This is not intended to be a restriction on the product stored within these tanks. BP reserves the right to store any liquid with a vapor pressure of equal to or less than 0.83 kPa (0.12 psia) within these tanks. The bulk distillate storage tanks (Tanks # 1 & # 32) and the horizontal storage tanks (Tanks # 14, # 27, # 34, # 35 & # 36) at this facility are exempt from the Title V application in accordance with 6 NYCRR Part 201-3.2(c)(26). The information contained in this permit regarding these tanks is for informational purposes only, however; the emissions from these tanks are included in the facility's Potential To Emit (PTE) calculations.

The tanks at the facility will have the following contents:

Gasoline in: Tank # 2
Tank # 3
Tank # 4
Tank # 5
Tank # 6
Tank # 7



Tank #8
Tank # 9
Tank # 10
Tank # 35 - OWS
Tank # 36 - Remediation Tank

Distillates in: Tank # 1
Tank # 32

Additives in: Tank # 34 - Red Dye
Tank # 14 - Distillate Additive
Tank # 27 - BASF Additive
Tank # 41 - Fuel additive (xylene)

The Title V permit contains a complete listing of the applicable federal, state, and compliance monitoring requirements for the facility, its emission units, its emission points, its processes and its emission sources/controls. BP Products is subject to the provisions of Title V permit specified under 6 NYCRR 201-6 in addition to the following regulations and conditions:

1. The throughput gasoline load rack limit of 600,000,000 gallons per year and a VOC vapor recovery unit emission limit of 10 mg/l of gasoline loaded (6 hour rolling average) on the VRU as per 6 NYCRR 229.3(d) in order to cap out of 6 NYCRR 231-2, New Source review.
2. Conduct a stack test on the vapor recovery units once during the term of this permit to prove compliance with the VOC emission limit of 10 mg/l of gasoline loaded as per 6 NYCRR 229.3(d).
3. The throughput distillate load rack has a limit of 177,000,000 gallons per year.
4. The facility's overall VOC emissions limit remains at 76.52 tons per year.
5. The facility's HAP emissions are below 25 tons per year for the total HAPs and below 10 tons per year for each individual HAP as per 40 CFR 63-R.420(a) for Benzene, Toluene, Hexane, and Xylene M, O & P Mixture for Gasoline Distribution Facility MACT - Section 63 NESHAPS.
6. Fuel reports, sampling and analysis in distillates and gasoline and fuel composition and use for sulfur in fuel limitations as per 6 NYCRR 225-1.
7. Monitoring, record keeping and reporting of Reid Vapor Pressure (RVP)



limitations in gasoline for May 1st through September 15 as per 6 NYCRR 225-3.

8. Control requirements of petroleum and volatile organic liquid storage tanks, fixed roof storage tanks and gasoline loading terminals for TANKS # 2, # 3, # 4, # 5, # 6, # 7, #8, # 9 & # 10 in Emission Unit U-GTANKS as per 6 NYCRR 229-3.

9. Recordkeeping of petroleum liquid fixed roof storage tanks of gasoline loading terminals for TANKS # 2, # 3, # 4, # 5, # 6, # 7, # 8, #9 & # 10 in Emission Unit U-GTANKS as per 6 NYCRR 229.5(a).

10. Record Keeping of average daily gasoline throughput of gasoline loading terminals as per 6 NYCRR 229.5(c).

11. Prohibitions and requirements for gasoline transport vehicles for repairs, labelling and testing as per 6 NYCRR 230.4 at Emission Unit U-GRACK.

12. Record Keeping and reporting of gasoline transport vehicles as per 6 NYCRR 230.6.

13. NSPS General Provisions, notification and record keeping for gasoline terminal loading racks over 20,000 gallons per day as per 40 CFR 60-A.

14. NSPS for gasoline terminal loading racks over 20,000 gallons per day as per 40 CFR 60-XX.

15. NSPS for volatile organic liquid storage vessels - standards for VOC as per 40 CFR 60-Kb.112b(a) for TANKS 9 & 10 in Emission Unit U-GTANKS.
NSPS for volatile organic liquid storage vessels - testing and procedures as per 40 CFR 60-Kb.113b(a) for TANKS 9 & 10 in Emission Unit U-GTANKS.
NSPS for volatile organic liquid storage vessels - standards for monitoring of operations as per 40 CFR 60-Kb.116b for TANKS 9 & 10 in Emission Unit U-GTANKS.

16. NSPS for volatile organic liquid storage vessels - monitoring of operations for Tank # 32. The facility is to retain accessible tank dimensions for the life of the tank and product storage records for at least two (2) years as per 40 CFR 60-Kb.116b.

17. NSPS for gasoline terminal loading racks over 20,000 gallons per day - standards for VOC as per 40 CFR 60-XX 502 for the vapor recovery units at the gasoline loading rack, Emission Unit U-GRACK.



18. NSPS for gasoline terminal loading racks over 20,000 gallons per day - reporting and recordkeeping as per 40 CFR 60-XX 505 for the vapor recovery units at the gasoline loading rack, Emission Unit U-GRACK.

19. Compliance Assurance Monitoring (CAM) Plan as per 40 CFR 64 for the vapor recover units in Emission Unit U-GRACK.

The facility is exempt from the MACT standard requirements of 40 CFR 63 Subpart R, as it is an area source and not a major source for HAPs, complying with the parameters established under the screening equation of 40 CFR 63.420(a). The annual HAP emissions from the facility is capped to below 25 tons per year for the total HAPs and to below 10 tons per year for the individual HAP.

The facility also has two small office buildings and a one-story warehouse. The warehouse stores both 55-gallon drums and smaller containers with non-gasoline petroleum products plus miscellaneous cleaning and maintenance supplies.

The facility operates other sources which are considered exempt from permitting in accordance with 6 NYCRR 201-3.2(c), including four (4) combustion installations with heat input capacity < 10 MM Btu/hr, one (1) emergency power generator to provide power < 500 hrs/yr, three (3) fuel oil storage tanks with storage capacities < 300,000 bbls and six (6) horizontal petroleum storage tanks which are Tanks # 14, # 27, # 34, # 35, #36 & # 41.

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: JOHN F CRYAN
NYSDEC
47-40 21ST ST
LONG ISLAND CITY, NY 11101-5407

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
 - Applications for permit renewals, modifications and transfers
 - Applications for Permit Renewals and Modifications
 - Permit modifications, suspensions or revocations by the Department
 - Permit Modifications, Suspensions and Revocations by the Department

Facility Level

- Submission of Applications for Permit Modification or Renewal-REGION 2 HEADQUARTERS
- Submission of application for permit modification or renewal - REGION 2 HEADQUARTERS



DEC GENERAL CONDITIONS

****** General Provisions ******

For the purpose of your Title V permit, the following section contains state-only enforceable terms and conditions.

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations

Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 2-1: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 2-1.1:

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 2-1.2:

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 2-1.3:

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be



submitted prior to actual transfer of ownership.

Condition 3: Applications for Permit Renewals and Modifications

Applicable State Requirement: 6 NYCRR 621.13

Item 3.1:

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 3.3:

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Condition 2-2: Permit modifications, suspensions or revocations by the Department

Applicable State Requirement: 6 NYCRR 621.13

Item 2-2.1:

The Department reserves the right to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

Condition 4: Permit Modifications, Suspensions and Revocations by the Department

Applicable State Requirement: 6 NYCRR 621.14

Item 4.1:

The Department reserves the right to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;



e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

****** Facility Level ******

Condition 5: Submission of Applications for Permit Modification or Renewal-REGION 2 HEADQUARTERS

Applicable State Requirement: 6 NYCRR 621.5 (a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 2 Headquarters
Division of Environmental Permits
1 Hunters Point Plaza, 4740 21st Street
Long Island City, NY 11101-5407
(718) 482-4997

Condition 2-3: Submission of application for permit modification or renewal - REGION 2

HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 2-3.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 2 Headquarters
Division of Environmental Permits
1 Hunters Point Plaza, 4740 21st Street
Long Island City, NY 11101-5407
(718) 482-4997

New York State Department of Environmental Conservation

Permit ID: 2-6101-00055/00021

Facility DEC ID: 2610100055



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To:BP PRODUCTS NORTH AMERICA INC
28100 TORCH PKWY
WARRENVILLE, IL 60555

Facility: BP PRODUCTS N AMERICA BROOKLYN TERMINAL
125 APOLLO ST
BROOKLYN, NY 11222

Authorized Activity By Standard Industrial Classification Code:
5171 - PETROLEUM BULK STATIONS & TERMINALS

Mod 0 Permit Effective Date: 01/05/2006

Permit Expiration Date: 01/04/2011

Mod 1 Permit Effective Date: 08/15/2006

Permit Expiration Date: 01/04/2011

Mod 2 Permit Effective Date: 08/24/2010

Permit Expiration Date: 01/04/2011



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6 NYCRR 201-6.5 (a) (7): Fees
- 3 6 NYCRR 201-6.5 (c): Recordkeeping and reporting of compliance monitoring
- 4 6 NYCRR 201-6.5 (c) (2): Monitoring, Related Recordkeeping, and Reporting Requirements.
- 5 6 NYCRR 201-6.5 (c) (3) (ii): Compliance Certification
- 6 6 NYCRR 201-6.5 (e): Compliance Certification
- 7 6 NYCRR 202-2.1: Compliance Certification
- 8 6 NYCRR 202-2.5: Recordkeeping requirements
- 9 6 NYCRR Part 215: Open Fires Prohibited at Industrial and Commercial Sites
- 2-1 6 NYCRR 215.2: Open Fires - Prohibitions
- 10 6 NYCRR 200.7: Maintenance of Equipment
- 11 6 NYCRR 201-1.7: Recycling and Salvage
- 2-2 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 13 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 14 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 15 6 NYCRR 201-6.5 (a) (4): Standard Requirement - Provide Information
- 16 6 NYCRR 201-6.5 (a) (8): General Condition - Right to Inspect
- 17 6 NYCRR 201-6.5 (d) (5): Standard Requirements - Progress Reports
- 18 6 NYCRR 201-6.5 (f) (6): Off Permit Changes
- 2-3 6 NYCRR 202-1.1: Required Emissions Tests
- 20 6 NYCRR 211.3: Visible Emissions Limited
- 21 40 CFR Part 68: Accidental release provisions.
- 22 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 23 6 NYCRR Subpart 201-6: Emission Unit Definition
- 2-4 6 NYCRR 201-6.5 (g): Non Applicable requirements
- 24 6 NYCRR 201-6.5 (g): Non Applicable requirements
- 25 6 NYCRR 225-1.8: Compliance Certification
- 26 6 NYCRR 225-1.8 (b): Compliance Certification
- 27 6 NYCRR 225-1.8 (d): Sampling, compositing, and analysis of fuel samples
- 28 6 NYCRR 225-3.3 (a): Compliance Certification
- 2-5 6 NYCRR 225-3.4 (a): Compliance Certification
- 2-6 6 NYCRR 225.1 (a) (3): Compliance Certification
- 2-7 6 NYCRR 225.1 (a) (3): Compliance Certification
- 31 6 NYCRR 229.5: Compliance Certification
- 32 6 NYCRR 229.5 (c): Compliance Certification
- 33 40CFR 60.4, NSPS Subpart A: EPA Region 2 address.
- 34 40CFR 60.7(b), NSPS Subpart A: Recordkeeping requirements.
- 35 40CFR 60.7(f), NSPS Subpart A: Facility files for subject sources.
- 36 40CFR 60, NSPS Subpart Kb: Compliance Certification
- 2-8 40CFR 60.502(b), NSPS Subpart XX: Compliance Certification
- 2-9 40CFR 63.420(a), Subpart R: Compliance Certification
- 38 40CFR 63.420(a), Subpart R: Compliance Certification



- 39 40CFR 63.420(a), Subpart R: Compliance Certification
- 40 40CFR 63.420(a), Subpart R: Compliance Certification
- 41 40CFR 63.420(a), Subpart R: Compliance Certification
- 42 40CFR 63.420(a), Subpart R: Compliance Certification
- 44 40 CFR Part 82: Recycling and emissions reduction.

Emission Unit Level

- 45 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
- 46 6 NYCRR Subpart 201-6: Process Definition By Emission Unit

EU=U-DRACK

- 47 40CFR 60.505(c), NSPS Subpart XX: Compliance Certification

EU=U-DRACK,EP=DRACK,Proc=006

- 48 6 NYCRR 225-1.8 (c): Compliance Certification

EU=U-DRACK,EP=DRACK,Proc=006,ES=DRACK

- 49 40CFR 60.505(c), NSPS Subpart XX: Compliance Certification

EU=U-GRACK

- 50 6 NYCRR 230.4 (a) (2): Repairs to gasoline transport vehicles
- 51 6 NYCRR 230.4 (a) (3): Labelling of gasoline transport vehicles
- 52 6 NYCRR 230.4 (b): Compliance Certification
- 53 6 NYCRR 230.4 (e): Leak limit
- 54 6 NYCRR 230.4 (f): Compliance Certification
- 55 6 NYCRR 230.6 (a): Compliance Certification
- 56 6 NYCRR 230.6 (b): Compliance Certification
- 57 40CFR 60.502(f), NSPS Subpart XX: Truck loading compatibility
- 58 40CFR 60.502(g), NSPS Subpart XX: Vapor collection connection required
- 59 40CFR 60.502(i), NSPS Subpart XX: Vent pressure limit
- 60 40CFR 60.502(j), NSPS Subpart XX: Compliance Certification
- 61 40CFR 60.505(c), NSPS Subpart XX: Compliance Certification

EU=U-GRACK,Proc=005

- 62 6 NYCRR 230.4 (g): Dome covers

EU=U-GRACK,EP=GRACK,Proc=005

- 63 6 NYCRR 229.3 (d): Compliance Certification
- 64 6 NYCRR 230.4 (a) (1): Compliance Certification
- 65 40CFR 60.502(e), NSPS Subpart XX: Compliance Certification
- 66 40CFR 60.505(b), NSPS Subpart XX: Compliance Certification

EU=U-GRACK,EP=GRACK,Proc=005,ES=0AVRU

- 67 6 NYCRR 230.4 (a) (2): Repairs to gasoline transport vehicles
- 68 6 NYCRR 230.4 (a) (3): Labelling of gasoline transport vehicles
- 69 6 NYCRR 230.4 (b): Compliance Certification
- 70 6 NYCRR 230.4 (e): Leak limit
- 71 6 NYCRR 230.4 (f): Compliance Certification
- 72 6 NYCRR 230.6 (a): Compliance Certification
- 73 6 NYCRR 230.6 (b): Compliance Certification
- 74 40CFR 60.502(f), NSPS Subpart XX: Truck loading compatibility
- 75 40CFR 60.502(g), NSPS Subpart XX: Vapor collection connection required
- 76 40CFR 60.502(i), NSPS Subpart XX: Vent pressure limit



- 77 40CFR 60.502(j), NSPS Subpart XX: Compliance Certification
- 78 40CFR 60.505(c), NSPS Subpart XX: Compliance Certification

EU=U-GRACK,EP=GRACK,Proc=005,ES=0BVRU

- 79 6 NYCRR 230.4 (a) (2): Repairs to gasoline transport vehicles
- 80 6 NYCRR 230.4 (a) (3): Labelling of gasoline transport vehicles
- 81 6 NYCRR 230.4 (b): Compliance Certification
- 82 6 NYCRR 230.4 (e): Leak limit
- 83 6 NYCRR 230.4 (f): Compliance Certification
- 84 6 NYCRR 230.6 (a): Compliance Certification
- 85 6 NYCRR 230.6 (b): Compliance Certification
- 86 40CFR 60.502(f), NSPS Subpart XX: Truck loading compatibility
- 87 40CFR 60.502(g), NSPS Subpart XX: Vapor collection connection required
- 88 40CFR 60.502(i), NSPS Subpart XX: Vent pressure limit
- 89 40CFR 60.502(j), NSPS Subpart XX: Compliance Certification
- 90 40CFR 60.505(c), NSPS Subpart XX: Compliance Certification
- 91 40 CFR Part 64: Compliance Certification
- 92 40 CFR Part 64: Compliance Certification

EU=U-GRACK,EP=GRACK,Proc=005,ES=0OVRU

- 93 6 NYCRR 230.4 (a) (2): Repairs to gasoline transport vehicles
- 94 6 NYCRR 230.4 (a) (3): Labelling of gasoline transport vehicles
- 95 6 NYCRR 230.4 (b): Compliance Certification
- 96 6 NYCRR 230.4 (e): Leak limit
- 97 6 NYCRR 230.4 (f): Compliance Certification
- 98 6 NYCRR 230.6 (a): Compliance Certification
- 99 6 NYCRR 230.6 (b): Compliance Certification
- 100 40CFR 60.502(f), NSPS Subpart XX: Truck loading compatibility
- 101 40CFR 60.502(g), NSPS Subpart XX: Vapor collection connection required
- 102 40CFR 60.502(i), NSPS Subpart XX: Vent pressure limit
- 103 40CFR 60.502(j), NSPS Subpart XX: Compliance Certification
- 104 40CFR 60.505(c), NSPS Subpart XX: Compliance Certification

EU=U-GRACK,EP=GRACK,Proc=005,ES=0PVRU

- 105 6 NYCRR 230.4 (a) (2): Repairs to gasoline transport vehicles
- 106 6 NYCRR 230.4 (a) (3): Labelling of gasoline transport vehicles
- 107 6 NYCRR 230.4 (b): Compliance Certification
- 108 6 NYCRR 230.4 (e): Leak limit
- 109 6 NYCRR 230.4 (f): Compliance Certification
- 110 6 NYCRR 230.6 (a): Compliance Certification
- 111 6 NYCRR 230.6 (b): Compliance Certification
- 112 40CFR 60.502(f), NSPS Subpart XX: Truck loading compatibility
- 113 40CFR 60.502(g), NSPS Subpart XX: Vapor collection connection required
- 114 40CFR 60.502(i), NSPS Subpart XX: Vent pressure limit
- 115 40CFR 60.502(j), NSPS Subpart XX: Compliance Certification
- 116 40CFR 60.505(c), NSPS Subpart XX: Compliance Certification
- 117 40 CFR Part 64: Compliance Certification
- 118 40 CFR Part 64: Compliance Certification

EU=U-TANKS

- 119 6 NYCRR 229.5 (a): Compliance Certification



EU=U-TANKS,EP=00002,Proc=001,ES=TK02C

- 120 6 NYCRR 229.3 (a): Compliance Certification
- 121 6 NYCRR 229.3 (e) (1): Compliance Certification

EU=U-TANKS,EP=00003,Proc=001,ES=TK03C

- 122 6 NYCRR 229.3 (a): Compliance Certification
- 123 6 NYCRR 229.3 (e) (1): Compliance Certification

EU=U-TANKS,EP=00004,Proc=001,ES=TK04C

- 124 6 NYCRR 229.3 (a): Compliance Certification
- 125 6 NYCRR 229.3 (e) (1): Compliance Certification

EU=U-TANKS,EP=00005,Proc=001,ES=TK05C

- 126 6 NYCRR 229.3 (a): Compliance Certification
- 127 6 NYCRR 229.3 (e) (1): Compliance Certification

EU=U-TANKS,EP=00006,Proc=001,ES=TK06C

- 128 6 NYCRR 229.3 (a): Compliance Certification
- 129 6 NYCRR 229.3 (e) (1): Compliance Certification

EU=U-TANKS,EP=00007,Proc=001,ES=TK07C

- 130 6 NYCRR 229.3 (a): Compliance Certification

EU=U-TANKS,EP=00007,Proc=003,ES=TK07C

- 131 6 NYCRR 229.3 (e) (1): Compliance Certification

EU=U-TANKS,EP=00008,Proc=003,ES=TK08C

- 2-10 6 NYCRR 229.3 (e) (1): Compliance Certification
- 2-11 40CFR 60, NSPS Subpart Kb: Compliance Certification
- 2-12 40CFR 60.113b, NSPS Subpart Kb: Compliance Certification
- 2-13 40CFR 60.113b(a)(2), NSPS Subpart Kb: Compliance Certification
- 2-14 40CFR 60.113b(a)(4), NSPS Subpart Kb: Compliance Certification
- 2-15 40CFR 60.113b(a)(5), NSPS Subpart Kb: Compliance Certification

EU=U-TANKS,EP=00009,Proc=001,ES=TK09C

- 132 40CFR 60.112b(a), NSPS Subpart Kb: Standards for VOCs.
- 133 40CFR 60.113b(a)(5), NSPS Subpart Kb: Compliance Certification

EU=U-TANKS,EP=00009,Proc=003,ES=TK09C

- 134 6 NYCRR 229.3 (a): Compliance Certification
- 135 6 NYCRR 229.3 (e) (1): Compliance Certification
- 136 40CFR 60, NSPS Subpart Kb: Compliance Certification
- 137 40CFR 60.112b(a), NSPS Subpart Kb: Standards for VOCs.
- 138 40CFR 60.113b, NSPS Subpart Kb: Compliance Certification
- 139 40CFR 60.113b(a)(2), NSPS Subpart Kb: Compliance Certification
- 140 40CFR 60.113b(a)(4), NSPS Subpart Kb: Compliance Certification
- 141 40CFR 60.113b(a)(5), NSPS Subpart Kb: Compliance Certification

EU=U-TANKS,EP=00010,Proc=001,ES=TK10C

- 142 40CFR 60.112b(a), NSPS Subpart Kb: Standards for VOCs.
- 143 40CFR 60.113b(a)(5), NSPS Subpart Kb: Compliance Certification



EU=U-TANKS,EP=00010,Proc=003,ES=TK10C

- 144 6 NYCRR 229.3 (a): Compliance Certification
- 145 6 NYCRR 229.3 (e) (1): Compliance Certification
- 146 40CFR 60, NSPS Subpart Kb: Compliance Certification
- 147 40CFR 60.112b(a), NSPS Subpart Kb: Standards for VOCs.
- 148 40CFR 60.113b, NSPS Subpart Kb: Compliance Certification
- 149 40CFR 60.113b(a)(2), NSPS Subpart Kb: Compliance Certification
- 150 40CFR 60.113b(a)(4), NSPS Subpart Kb: Compliance Certification
- 151 40CFR 60.113b(a)(5), NSPS Subpart Kb: Compliance Certification

EU=U-TANKS,EP=00032,Proc=002,ES=TAN32

- 152 40CFR 60.116b, NSPS Subpart Kb: Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 153 ECL 19-0301: Contaminant List
- 2-16 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
- 2-17 6 NYCRR 211.2: Air pollution prohibited
- 156 6 NYCRR 211.2: Compliance Demonstration



FEDERALLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS
The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency constitutes an affirmative defense to an action brought 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 and/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;
- (3) During the period of the emergency the facility owner and/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 and/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 and/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 B: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10 (b)

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.



Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR 201-6.3 (a) (4)

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item D: Certification by a Responsible Official - 6 NYCRR 201-6.3 (d) (12)

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: Requirement to Comply With All Conditions - 6 NYCRR 201-6.5 (a) (2)

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR 201-6.5 (a) (3)

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.5 (a) (5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item H: Property Rights - 6 NYCRR 201-6.5 (a) (6)

This permit does not convey any property rights of any sort or any exclusive privilege.



Item I: Severability - 6 NYCRR 201-6.5 (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 J: Permit Shield - 6 NYCRR 201-6.5 (g)

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

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

Item K: Reopening for Cause - 6 NYCRR 201-6.5 (i)

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is



three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

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

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

Item L: Permit Exclusion - ECL 19-0305

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



(NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

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

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

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS
SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES**

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.

Condition 1: Acceptable Ambient Air Quality
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 200.6

Item 1.1:

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Condition 2: Fees
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 201-6.5 (a) (7)

Item 2.1:

The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0302.

Condition 3: Recordkeeping and reporting of compliance monitoring
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 201-6.5 (c)

Item 3.1:



The following information must be included in any required compliance monitoring records and reports:

- (i) The date, place, and time of sampling or measurements;
- (ii) The date(s) analyses were performed;
- (iii) The company or entity that performed the analyses;
- (iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;
- (v) The results of such analyses including quality assurance data where required; and
- (vi) The operating conditions as existing at the time of sampling or measurement.

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.3 of this Part 201.

Condition 4: Monitoring, Related Recordkeeping, and Reporting Requirements.

Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement: 6 NYCRR 201-6.5 (c) (2)

Item 4.1:

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

Condition 5: Compliance Certification

Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement: 6 NYCRR 201-6.5 (c) (3) (ii)

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum



frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

(1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.

(2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.

(3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.

(4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A



written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.3(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.



Subsequent reports are due every 6 calendar month(s).

Condition 6: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement: 6 NYCRR 201-6.5 (e)

Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Requirements for compliance certifications with terms and conditions contained in this facility permit include the following:

- i. Compliance certifications shall contain:
 - the identification of each term or condition of the permit that is the basis of the certification;
 - the compliance status;
 - whether compliance was continuous or intermittent;
 - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
 - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions; and
 - such additional requirements as may be specified elsewhere in this permit related to compliance certification.
- ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.
- iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

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Permit ID: 2-6101-00055/00021

Facility DEC ID: 2610100055



iv. All compliance certifications shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Please send annual compliance certifications to Chief of the Stationary Source Compliance Section, the Region 2 EPA representative for the Administrator, at the following address:

USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866

The address for the RAPCE is as follows:

Hunters Point Plaza
47-40 21st Street
Long Island City, NY 11101-5407

The address for the BQA is as follows:

NYSDEC
Bureau of Quality Assurance
625 Broadway
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2007.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 202-2.1

Item 7.1:
The Compliance Certification activity will be performed for the Facility.

Item 7.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

New York State Department of Environmental Conservation

Permit ID: 2-6101-00055/00021

Facility DEC ID: 2610100055



Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due by April 15th for previous calendar year

Condition 8: Recordkeeping requirements
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 202-2.5

Item 8.1:

(a) The following records shall be maintained for at least five years:

- (1) a copy of each emission statement submitted to the department; and
- (2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

(b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

Condition 9: Open Fires Prohibited at Industrial and Commercial Sites
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR Part 215

Item 9.1:

No person shall burn, cause, suffer, allow or permit the burning in an open fire of garbage, refuse, rubbish for salvage, or rubbish generated by industrial or commercial activities.

Condition 2-1: Open Fires - Prohibitions
Effective between the dates of 08/24/2010 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 215.2

Item 2-1.1:

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

Item 2-1.2

Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous



agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.

- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.
- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
- (i) Prescribed burns performed according to Part 194 of this Title.
- (j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.
- (k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.
- (l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS
SUBJECT TO ANNUAL CERTIFICATIONS ONLY IF APPLICABLE**

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period.

[NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

Condition 10: Maintenance of Equipment
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement: 6 NYCRR 200.7

Item 10.1:

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

Condition 11: Recycling and Salvage



Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 201-1.7

Item 11.1:

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

Condition 2-2: Prohibition of Reintroduction of Collected Contaminants to the air

Effective between the dates of 08/24/2010 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 201-1.8

Item 2-2.1:

No person shall unnecessarily remove, handle or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Condition 13: Exempt Sources - Proof of Eligibility

Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 201-3.2 (a)

Item 13.1:

The owner and/or operator of an emission source or unit that is eligible to be exempt may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source 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 which contains 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.

Condition 14: Trivial Sources - Proof of Eligibility

Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 201-3.3 (a)

Item 14.1:

The owner and/or operator of an emission source or unit that is listed as being trivial in this Part may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source 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 which contains 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.

Condition 15: Standard Requirement - Provide Information

Effective between the dates of 01/05/2006 and 01/04/2011



Applicable Federal Requirement:6 NYCRR 201-6.5 (a) (4)

Item 15.1:

The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

Condition 16: General Condition - Right to Inspect
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 201-6.5 (a) (8)

Item 16.1:

The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

- (i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and
- (iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 17: Standard Requirements - Progress Reports
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 201-6.5 (d) (5)

Item 17.1:

Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:

- (i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
- (ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Condition 18: Off Permit Changes



Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 201-6.5 (f) (6)

Item 18.1:

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

(i) For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(ii) The permit shield described in section 6 NYCRR 201-6.6 shall not apply to any change made pursuant to this paragraph.

Condition 2-3: Required Emissions Tests

Effective between the dates of 08/24/2010 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 202-1.1

Item 2-3.1:

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time.

Condition 20: Visible Emissions Limited

Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 211.3

Item 20.1:

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

Condition 21: Accidental release provisions.

Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40 CFR Part 68

Item 21.1:

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If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:
 - 1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,
 - 2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

Risk Management Plan Reporting Center
C/O CSC
8400 Corporate Dr
Carrollton, Md. 20785

Condition 22: Recycling and Emissions Reduction
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 82, Subpart F

Item 22.1:

The permittee shall comply with all applicable provisions of 40 CFR Part 82.

The following conditions are subject to annual compliance certification requirements for Title V permits only.

Condition 23: Emission Unit Definition
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 23.1(From Mod 2):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-TANKS

Emission Unit Description:

Emission Unit U-TANKS is defined as all of the above-ground storage tanks at the facility. There are nine (9) bulk tanks containing internal floating roofs, two (2) bulk cone roof tanks, and six (6) smaller horizontal tanks. Products stored within these tanks include refined petroleum products, ethanol, and fuel additives.



The two (2) cone roof tanks are locally referred to as Tank #1 and Tank #32. Storage Tanks #1 and 32 will be used to store refined petroleum products with a vapor pressure of less than or equal to 5.1 kPa (0.74 psia). PTE calculations were performed using kerosene in order to represent a worst-case-scenario for the products stored within these tanks. This is not intended to be interpreted as a restriction on the products stored within these tanks. BP Products reserves the right to store any liquid with a vapor pressure of less than or equal to 5.1 kPa (0.76 psia) within these tanks.

The nine (9) tanks equipped with internal floating roofs and two (2) of the horizontal tanks are locally referred to as Tanks #2, 3, 4, 5, 6, 7, 8, 9, 10, 35 and 36. Tanks #2, 3, 4, 5, 6, 7, 8, 9, 10, 35 and 36 will have the flexibility of being used to store refined petroleum products (gasoline and distillate) with a vapor pressure of less than or equal to 76.6 kPa (11.1 psia) and denatured ethanol within these tanks. All of the noted tanks, with the exception of horizontal Tanks #35 and 36, are equipped with an internal floating roof. Potential to emit (PTE) calculations for these tanks were done utilizing gasoline with an RVP of 13. RVP 13 gasoline was chosen to represent an average vapor pressure for the products to be stored within these tanks. This is not intended to be interpreted as a restriction on the products stored within these tanks. BP reserves the right to store any liquid with a vapor pressure of less than or equal to 76.6 kPa (11.1 psia) within these tanks.

The four (4) remaining horizontal tanks are locally referred to as Tank #14, 27, 34 and 41. Tanks #14, 27, 34 and 41 will be used to store fuel additives with a vapor pressure of less than or equal to 0.83 kPa (0.12 psia). Potential to emit (PTE) calculations were performed using Xylene in order to represent a worst-case-scenario for the products stored within these tanks. This is not intended to be a restriction on the product stored within these tanks. BP reserves the right to store any liquid with a vapor pressure of equal to or less than 0.83 kPa (0.12 psia) within these tanks.

This emission unit consists of Emission Points 00001, 00002, 00003, 00004, 00005, 00006, 00007, 00008, 00009, 00010, 00014, 00027, 00032, 00034, 00035, 00036 & 00041 referring to each of the storage tanks, Processes 001, 002, 003 & 004, and Emission Sources/Controls TAN01, TK02C, TK02P, TK03C, TK03P, TK04C, TK04P, TK05C, TK05P, TK06C, TK06P, TK07C, TK07P, TK08C, TK08P, TK09C, TK09P, TK10C, TK10P, TAN14, TAN27, TAN32, TAN34, TAN35, TAN36 & TAN41.



Item 23.2(From Mod 0):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-DRACK

Emission Unit Description:

Emission Unit U-DRACK is defined as the distillate loading rack. The distillate rack consists of five (5) loading bays with a total of fourteen (14) loading arms. Products transferred through the loading rack include refined petroleum products with vapor pressures less than 5.1 kPa (0.74 psia).

Emission Unit U-DRACK consists of Emission Point DRACK, Process 006 and Emission Source/Control DRACK.

Building(s): N/A

Item 23.3(From Mod 0):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-GRACK

Emission Unit Description:

Emission Unit U-GRACK is defined as the gasoline loading rack. The gasoline rack consists of four (4) loading bays with a total of fourteen (14) loading arms. Products transferred through the loading rack include refined petroleum products and ethanol with vapor pressure less than 76.6 kPa (11.1 psia). The emissions from the gasoline loading rack are controlled by a John Zinc Vapor Recovery Unit (primary or backup - Emission Sources/Controls 0AVRU, 0BVRU, 0OVRU and 0PVRU).

Emission Unit U-GRACK consists of Emission Point GRACK, Process 005 and Emission Sources/Controls 0AVRU, 0BVRU, 0OVRU and 0PVRU.

Emission Source 0PVRU is the the loading of refined petroleum products and ethanol into transport vehicles process for the primary John Zinc vapor recovery unit.

Emission Source 0OVRU is the control for the primary John Zinc vapor recovery unit.

Emission Source 0BVRU is the loading of refined petroleum products and ethanol into transport vehicles process for the back-up (secondary) John Zinc vapor recovery unit.

Emission Source 0AVRU is the control for the back-up (secondary) John Zinc vapor recovery unit.



Building(s): N/A

Condition 2-4: Non Applicable requirements
Effective between the dates of 08/24/2010 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 201-6.5 (g)

Item 2-4.1:

This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

(From Mod 2) 6 NYCRR Subpart 231-2

Reason: Non-Attainment NSR Applicability:

The BP Brooklyn Terminal is currently an existing major facility for VOC. For each regulated NSR contaminant, the project emission potential is determined only for modifications at existing facilities. The project emission potential must consider only the proposed emission increases, and for existing emission sources at a major facility, it is calculated as the difference between the baseline actual emissions and the projected actual emissions of the emission source. Or, for new emission sources, as the sum of the potential to emit of each emission source. The baseline period established for the Brooklyn Terminal is May 2005 through April 2007. The baseline period is defined as any 24 consecutive months within the 5 years immediately preceding the date of commencement.

The conversion of Tank #8 from a fixed roof tank containing kerosene to an internal floating roof tank containing gasoline and the installation of a new 4,000 gallons horizontal tank containing fuel additives (xylene) at the Brooklyn Terminal results in a "Project Emission Potential" (PEP) of 2.2 TPY. These proposed changes result in a minor modification to emission unit U-TANKS only. For the Brooklyn Terminal to be subject to New Source Review permitting obligations, this project would need to have a PEP of greater than 2.5 TPY VOC (the significant project threshold for severe non-attainment areas). The demonstrated PEP (2.20 TPY) is less than 2.5 TPY and is not subject to Part 231.5 NSR permitting.

The proposed project must exceed the significant source project threshold of 2.5 TPY VOC to trigger NSR program applicability. The calculations summarized below demonstrate that the future potential emissions, less prior actual emissions, are below the NSR program applicability threshold of 2.5 TPY VOC.



Baseline Actual Emissions:

Baseline Actual Average (May 2005 - april 2007) = Tank #8
+ Gasoline Loading Rack Fugitives + Vapor Recovery Unit =
 $0.17 + 8.95 + 0.88 = 10.00$ TPY of VOC

Projected Actual Emissions are defined as the maximum annual rate, in TPY, at which an existing emission source is projected to emit a regulated NSR contaminant in any one of the five years (12-month period) after a modification. Projected Actual Emissions for sources within the project boundary are presented as follows:

Projected Actual Emissions = Tank #8 + Gasoline Loading
Rack Fugitives + Vapor Recovery Unit +Tank #41 =
 $= 1.53 +$
 $10.36 + 0.30 + 0.01 = 12.20$ TPY of VOC

Major Nonattainment NSR Applicability
Calculation:

Project Emission Potential = Projected Actual Emissions
- Baseline Actual Emissions = $12.20 - 10.00 =$
 2.20 of VOC

Since the demonstrated PEP (2.20 TPY) is less than the NSR program applicability threshold of 2.5 TPY of VOC, therefore; the project is not subject to Part 231.5 NSR permitting.

Condition 24: Non Applicable requirements
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 201-6.5 (g)

Item 24.1:

This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

6 NYCRR Subpart 231-2

Reason: In this application, BP Products North America Inc. (BP) is requesting an increase to the loading rack throughput limit. BP is requesting an increase on the throughput limit of the gasoline loading rack from the current permit limit of 400,000,000 gallons per year to 600,000,000 gallons per year. In order to accommodate this, BP is proposing to reduce the current vapor recovery unit



emission limit to 10 mg/l of gasoline loaded from the current 20 mg/l of gasoline loaded. The most recent stack test (that of April 24, 2002 tested at 0.89 mg/l) indicates that the unit is operating at a level well below both the existing and proposed limits.

Change in Potential VOC Emissions = Current Potential VOC Emissions - Future Potential VOC Emissions = 78.21 tpy - 76.52 tpy = 1.69 tpy

The MAP (maximum annual potential) from the facility decreases by 1.69 tons, as compared to the current facility VOC emission limit of 78.21 tons. The current Title V permit limits the facility to an annual gasoline load rack limit of 400,000,000 gallons per year. As previously stated, BP proposes to increase this limit to 600,000,000 gallons per year. The proposed VOC limit for the terminal is 76.52 tons per year (78.21 tons - 1.69 tons) which BP requests as an enforceable limit.

Therefore, there will be no increase in potential VOC emissions (and in fact there will be a decrease), Non-attainment NSR is not applicable to this project.

The facility is a bulk terminal with two truck loading racks to load gasoline, distillates, denatured ethanol and additives into truck tanks. This facility stores gasoline, distillates, denatured ethanol, and gasoline additives prior to distribution. Product is received via pipeline, truck and barge. Product is distributed via truck.

NEW SOURCE REVIEW APPLICABILITY: Since there will not be any increase in potential VOC emissions from this project, therefore; non-attainment NSR is not applicable to this project. The proposed facility's limits are as follows:

Total gasoline load rack throughput limit: 600,000,000 gallons,
Total distillate load rack throughput limit: 177,000,000 gallons,
VRU emission rate limit: 10 mg/l of gasoline loaded.

Gasoline truck loading (VRU): Total VOC emissions = 25.04 tons, total HAP emissions = 0.73 tons,
Truck fugitives: Total VOC emissions 33.77 = tons, total HAP emissions = 1.09 tons,
Storage tanks: Total VOC emissions = 17.17 tons, total



HAP emissions = 0.63 tons,
 Equipment fugitives: Total VOC emissions = 0.54 tons,
 total HAP emissions = 0.02 tons,

Total facility's VOC emissions = 76.52 tons; total HAP emissions = 2.47 tons.

Total HAP Emissions	Total VOC Emissions
(tons)	(tons)
Gasoline Truck Loading (VRU):	25.04
0.73	
Truck Fugitives:	33.77
1.09	
Storage Tanks:	17.17
0.63	
Equipment	0.54
0.02	
TOTAL	76.52 TPY
2.47 TPY	

Condition 25: Compliance Certification
 Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement: 6 NYCRR 225-1.8

Item 25.1:
 The Compliance Certification activity will be performed for the Facility.

Item 25.2:
 Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

An owner or operator of a facility which purchases and fires coal and/or oil shall submit reports to the commissioner containing fuel analysis data, information on the quantity of the fuel received, burned, and results of any stack sampling, stack monitoring and any other procedures to ensure compliance with the provisions of 6 NYCRR Part 225-1. All records shall be available for a minimum of three years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.



Subsequent reports are due every 6 calendar month(s).

Condition 26: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 225-1.8 (b)

Item 26.1:

The Compliance Certification activity will be performed for the Facility.

Item 26.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any owner or operator of a facility subject to 6NYCRR Part 201-6 who sells oil and/or coal must retain, for at least three years, records containing the following information:

- i. fuel analysis and data on the quantities of all oil and coal received and;
- ii. the name of all purchasers, fuel analyses and data on the quantities of all oil and coal sold.

Such analyses must contain as a minimum:

1. data on the sulfur content, ash content, specific gravity and heating value of residual oil,
2. data on the sulfur content, specific gravity and heating value of distillate oil; and
3. data on the sulfur content, ash content, and heating value of coal.

The monitoring frequency is per batch of product received by the BP Brooklyn Terminal and NOT per truckload leaving the facility.

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

Subsequent reports are due every 6 calendar month(s).

Condition 27: Sampling, compositing, and analysis of fuel samples
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 225-1.8 (d)

Item 27.1:

All sampling, compositing, and analysis of fuel samples, taken to determine compliance with 6

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NYCRR Part 225-1, must be done in accordance with methods acceptable to the commissioner.

Condition 28: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 225-3.3 (a)

Item 28.1:

The Compliance Certification activity will be performed for the Facility.

Item 28.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

No person shall sell or supply gasoline to a retailer or wholesale purchaser-consumer, having a Reid Vapor Pressure (RVP) greater than 9.0 psi as sampled and tested by methods acceptable to the Commissioner, during the period between May 1 through September 15 of each year beginning 1989. Those records should identify who performed the test, when the fuel was delivered, when the test was performed, and the results of the test. The facility shall maintain records pursuant to 6 NYCRR 225-3 and must make the records available for inspection during normal business hours, at the location from which the gasoline was delivered, sold or dispensed, to the Commissioner's representative. The facility must also furnish copies of these records to the Commissioner's representative upon request. All records and documentation required to be made or maintained in accordance with 6 NYCRR 225-3, including any calculations performed, shall be maintained for at least two (2) years from the date of delivery.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: GASOLINE

Parameter Monitored: REID VAPOR PRESSURE

Upper Permit Limit: 9.0 pounds per square inch absolute

Reference Test Method: ASTM D323-99a

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

Subsequent reports are due every 6 calendar month(s).

Condition 2-5: Compliance Certification
Effective between the dates of 08/24/2010 and 01/04/2011



Applicable Federal Requirement:6 NYCRR 225-3.4 (a)

Item 2-5.1:

The Compliance Certification activity will be performed for the Facility.

Item 2-5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of any refinery, terminal, or bulk plant from which gasoline, subject to this Subpart, is distributed must maintain records on the gasoline that is delivered to or distributed from such facilities. These records shall include:

(1) The RVP of the gasoline if subject to section 225-3.3 of this Subpart.

(2) A designation of the appropriate time period(s) in which the gasoline is intended to be dispensed to motor vehicles.

(3) Written certification that the gasoline:

(i) conforms with all RVP and oxygen content requirements of this Subpart; and

(ii) is in compliance with all applicable State and Federal regulations which apply during the time period(s) specified pursuant to paragraph (3) of this subdivision.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2011.

Subsequent reports are due every 6 calendar month(s).

Condition 2-6: Compliance Certification
Effective between the dates of 08/24/2010 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 225.1 (a) (3)

Item 2-6.1:

The Compliance Certification activity will be performed for the Facility.

Item 2-6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

No person shall sell, offer for sale, purchase or use any residual fuel which contains sulfur in a quantity exceeding the limitations specified in Table 1 for 6 NYCRR 225-1.2(c), Table 2 for 6 NYCRR 225-1.2(d) and Table 3 for

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6 NYCRR 225-1.2(d) of this section and as appropriate for outside of the New York City area. The sulfur limit is listed below (0.30 percent by weight) for residual fuel (# 4, 5, and/or 6 fuel oil) is for the New York City area. The monitoring frequency is per batch of product delivered to the Brooklyn Terminal/raw material change.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: RESIDUAL FUEL (#4, #5 AND/OR #6 FUEL OIL)
Parameter Monitored: SULFUR CONTENT
Upper Permit Limit: 0.30 percent by weight
Reference Test Method: ASTM METHOD D4292
Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2011.
Subsequent reports are due every 6 calendar month(s).

Condition 2-7: Compliance Certification
Effective between the dates of 08/24/2010 and 01/04/2011

Applicable Federal Requirement: 6 NYCRR 225.1 (a) (3)

Item 2-7.1:

The Compliance Certification activity will be performed for the Facility.

Item 2-7.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

No person shall sell, offer for sale, purchase or use any residual fuel which contains sulfur in a quantity exceeding the limitations specified in Table 1 for 6 NYCRR 225-1.2(c), Table 2 for 6 NYCRR 225-1.2(d) and Table 3 for 6 NYCRR 225-1.2(d) of this section and as appropriate for outside of the New York City area. The sulfur limit is listed below (0.20 percent by weight) for distillates (# 1 and # 2 oil) is for the New York City area. The monitoring frequency is per batch of product delivered to the Brooklyn Terminal/raw material change.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: DISTILLATES - NUMBER 1 AND NUMBER 2 OIL
Parameter Monitored: SULFUR CONTENT
Upper Permit Limit: 0.20 percent by weight
Reference Test Method: ASTM METHOD D4292
Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL

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CHANGE
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY
TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2011.
Subsequent reports are due every 6 calendar month(s).

Condition 31: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement: 6 NYCRR 229.5

Item 31.1:
The Compliance Certification activity will be performed for the Facility.

Item 31.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The owner or operator of a gasoline bulk plant, gasoline loading terminal, petroleum liquid storage tank, marine loading vessel facility, or volatile organic liquid storage tank subject to this Part must maintain the following records at the facility for a period of five (5) years:

1. Capacities of petroleum liquid storage tanks subject to section 229.3(a) or (b) of this Part in gallons;
2. Average daily gasoline throughput per day for gasoline bulk plants subject to section 229.3(c) of this Part, in gallons;
3. Average daily gasoline throughput for gasoline loading subject to section 229.3(d) of this Part, in gallons per year; and
4. Capacities of volatile organic liquid storage tanks, subject to section 229.3(e) of this Part, in gallons.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2007.
Subsequent reports are due every 12 calendar month(s).

Condition 32: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011



Applicable Federal Requirement:6 NYCRR 229.5 (c)

Item 32.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 32.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Recordkeeping of average daily gasoline throughput for gasoline loading terminals. Records must be maintained at the facility for five (5) years. The average daily throughput is calculated by dividing the annual throughput by the number of workdays during the 12-month period which begins January 1st and ends on December 31st.

Monitoring Frequency: DAILY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2007.
Subsequent reports are due every 12 calendar month(s).

**Condition 33: EPA Region 2 address.
Effective between the dates of 01/05/2006 and 01/04/2011**

Applicable Federal Requirement:40CFR 60.4, NSPS Subpart A

Item 33.1:

All requests, reports, applications, submittals, and other communications to the Administrator pursuant to this part shall be submitted in duplicate to the following address:

Director, Division of Enforcement and Compliance Assistance
USEPA Region 2
290 Broadway, 21st Floor
New York, NY 10007-1886

Copies of all correspondence to the administrator pursuant to this part shall also be submitted to the NYSDEC Regional Office issuing this permit (see address at the beginning of this permit) and to the following address:

NYSDEC
Bureau of Quality Assurance
625 Broadway
Albany, NY 12233-3258

**Condition 34: Recordkeeping requirements.
Effective between the dates of 01/05/2006 and 01/04/2011**



Applicable Federal Requirement:40CFR 60.7(b), NSPS Subpart A

Item 34.1:

Affected owners or operators shall maintain records of occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.

**Condition 35: Facility files for subject sources.
Effective between the dates of 01/05/2006 and 01/04/2011**

Applicable Federal Requirement:40CFR 60.7(f), NSPS Subpart A

Item 35.1:

The following files shall be maintained at the facility for all affected sources: all measurements, including continuous monitoring systems, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations;all continuous monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by this part, recorded in permanent form suitable for inspections. The file shall be maintained for at least two years following the date of such measurements, reports, and records.

**Condition 36: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011**

Applicable Federal Requirement:40CFR 60, NSPS Subpart Kb

Item 36.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 36.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

NSPS for petroleum liquid storage tanks over 40,000 gallons capacity - standard for VOC is only applicable to Tanks # 109 & 110. All of the remaining fourteen (14) storage tanks were constructed and began operation on or before 1972, which is before the applicability date of 7/23/1984 for 40 CFR 60 Subpart Kb. These fourteen tanks are Tanks # 1, # 2, # 3, # 4, # 5, # 6, # 7, # 8, # 32, # 14, # 27, # 34, # 35 & # 36. A change in products stored in the storage tanks or installation of floating roof does not subject the storage tanks to the requirements of 40 CFR 60 Subpart Kb.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

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DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 2-8: Compliance Certification
Effective between the dates of 08/24/2010 and 01/04/2011

Applicable Federal Requirement:40CFR 60.502(b), NSPS Subpart XX

Item 2-8.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 2-8.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: AMBIENT AIR MONITORING

Monitoring Description:

Emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks are not to exceed 35 milligrams of total Volatile Organic Compounds (VOC) per liter of gasoline loaded. BP is voluntarily accepting a lower limit of 10 mg/l. A performance test was conducted on May 31, 2007 and tested at 0.26 mg/l. The facility is required to conduct another performance test within 5 years of the May 31, 2007 date.

Upper Permit Limit: 10 milligrams per liter

Reference Test Method: 25A OR 25B

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2011.

Subsequent reports are due every 6 calendar month(s).

Condition 2-9: Compliance Certification
Effective between the dates of 08/24/2010 and 01/04/2011

Applicable Federal Requirement:40CFR 63.420(a), Subpart R

Item 2-9.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Item 2-9.2:



Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Individual and total HAP emissions shall not exceed 10 and 25 tons respectively for any consecutive 12 month period. Verification via emissions calculations employing emissions factors shall be submitted to the Department. Records of annual gasoline throughput and HAP emissions shall be maintained at the facility for a period of five years.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2011.

Subsequent reports are due every 12 calendar month(s).

Condition 38: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 63.420(a), Subpart R

Item 38.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 001330-20-7 XYLENE, M, O & P MIXT.

Item 38.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The facility is limiting the gasoline annual throughput to 600,000,000 gallons and hence avoiding compliance with 40 CFR 63 Subpart R. By limiting the gasoline annual throughput, the facility is also limiting any individual HAP emission to under 10 tons per year. To remain below the applicability criteria of the gasoline distribution MACT, the facility shall not exceed a gasoline throughput of 600,000,000 gallons per year on a twelve months rolling average basis. This will ensure that the emissions screening factors for bulk gasoline is less than 1.0. Records of the annual gasoline throughput and the HAP emissions will be maintained at the facility for a period of five years. A letter certifying that the facility has not exceeded the gasoline throughput limit indicated in this permit will be sent to the NYSDEC - Region 2 office by January 30 of each year.



Work Practice Type: PROCESS MATERIAL THRUPUT
Process Material: GASOLINE
Upper Permit Limit: 600,000,000 gallons per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2007.
Subsequent reports are due every 12 calendar month(s).

Condition 39: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 63.420(a), Subpart R

Item 39.1:
The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 000071-43-2 BENZENE

Item 39.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

The facility is limiting the gasoline annual throughput to 600,000,000 gallons and hence avoiding compliance with 40 CFR 63 Subpart R. By limiting the gasoline annual throughput, the facility is also limiting any individual HAP emission to under 10 tons per year. To remain below the applicability criteria of the gasoline distribution MACT, the facility shall not exceed a gasoline throughput of 600,000,000 gallons per year on a twelve months rolling average basis. This will ensure that the emissions screening factors for bulk gasoline is less than 1.0. Records of the annual gasoline throughput and the HAP emissions will be maintained at the facility for a period of five years. A letter certifying that the facility has not exceeded the gasoline throughput limit indicated in this permit will be sent to the NYSDEC - Region 2 office by January 30 of each year.

Work Practice Type: PROCESS MATERIAL THRUPUT
Process Material: GASOLINE
Upper Permit Limit: 600,000,000 gallons per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.

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The initial report is due 1/30/2007.
Subsequent reports are due every 12 calendar month(s).

Condition 40: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 63.420(a), Subpart R

Item 40.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Item 40.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

The facility is limiting the gasoline annual throughput to 600,000,000 gallons and hence avoiding compliance with 40 CFR 63 Subpart R. By limiting the gasoline annual throughput, the facility is also limiting any individual HAP emission to under 10 tons per year. To remain below the applicability criteria of the gasoline distribution MACT, the facility shall not exceed a gasoline throughput of 600,000,000 gallons per year on a twelve months rolling average basis. This will ensure that the emissions screening factors for bulk gasoline is less than 1.0. Records of the annual gasoline throughput and the HAP emissions will be maintained at the facility for a period of five years. A letter certifying that the facility has not exceeded the gasoline throughput limit indicated in this permit will be sent to the NYSDEC - Region 2 office by January 30 of each year.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: GASOLINE

Upper Permit Limit: 600,000,000 gallons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

Condition 41: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 63.420(a), Subpart R



Item 41.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 000108-88-3 TOLUENE

Item 41.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The facility is limiting the gasoline annual throughput to 600,000,000 gallons and hence avoiding compliance with 40 CFR 63 Subpart R. By limiting the gasoline annual throughput, the facility is also limiting any individual HAP emission to under 10 tons per year. To remain below the applicability criteria of the gasoline distribution MACT, the facility shall not exceed a gasoline throughput of 600,000,000 gallons per year on a twelve months rolling average basis. This will ensure that the emissions screening factors for bulk gasoline is less than 1.0. Records of the annual gasoline throughput and the HAP emissions will be maintained at the facility for a period of five years. A letter certifying that the facility has not exceeded the gasoline throughput limit indicated in this permit will be sent to the NYSDEC - Region 2 office by January 30 of each year.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: GASOLINE

Upper Permit Limit: 600,000,000 gallons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

Condition 42: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 63.420(a), Subpart R

Item 42.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 000110-54-3 HEXANE

Item 42.2:

Compliance Certification shall include the following monitoring:

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Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The facility is limiting the gasoline annual throughput to 600,000,000 gallons and hence avoiding compliance with 40 CFR 63 Subpart R. By limiting the gasoline annual throughput, the facility is also limiting any individual HAP emission to under 10 tons per year. To remain below the applicability criteria of the gasoline distribution MACT, the facility shall not exceed a gasoline throughput of 600,000,000 gallons per year on a twelve months rolling average basis. This will ensure that the emissions screening factors for bulk gasoline is less than 1.0. Records of the annual gasoline throughput and the HAP emissions will be maintained at the facility for a period of five years. A letter certifying that the facility has not exceeded the gasoline throughput limit indicated in this permit will be sent to the NYSDEC - Region 2 office by January 30 of each year.

Work Practice Type: PROCESS MATERIAL THROUGHPUT

Process Material: GASOLINE

Upper Permit Limit: 600,000,000 gallons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

Condition 44: Recycling and emissions reduction.
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40 CFR Part 82

Item 44.1: The permittee shall comply with all applicable provisions of 40 CFR Part 82.

**** Emission Unit Level ****

Condition 45: Emission Point Definition By Emission Unit
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 45.1(From Mod 2):

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-TANKS

Emission Point: 00008



Height (ft.): 40 Diameter (in.): 36
NYTMN (km.): 4508.8 NYTME (km.): 589.7

Emission Point: 00041
Height (ft.): 5 Diameter (in.): 3
NYTMN (km.): 4508.8 NYTME (km.): 589.7

Item 45.2(From Mod 0):

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-DRACK

Emission Point: DRACK
Height (ft.): 16 Diameter (in.): 10
NYTMN (km.): 4508.8 NYTME (km.): 589.7

Item 45.3(From Mod 0):

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-GRACK

Emission Point: GRACK
Height (ft.): 16 Diameter (in.): 10
NYTMN (km.): 4508.8 NYTME (km.): 589.7

Item 45.4(From Mod 0):

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-TANKS

Emission Point: 00001
Height (ft.): 40 Diameter (in.): 36
NYTMN (km.): 4508.8 NYTME (km.): 589.7

Emission Point: 00002
Height (ft.): 40 Diameter (in.): 36
NYTMN (km.): 4508.8 NYTME (km.): 589.7

Emission Point: 00003
Height (ft.): 40 Length (in.): 36 Width (in.): 36
NYTMN (km.): 4508.8 NYTME (km.): 589.7

Emission Point: 00004
Height (ft.): 40 Length (in.): 36 Width (in.): 36
NYTMN (km.): 4508.8 NYTME (km.): 589.7

Emission Point: 00005
Height (ft.): 40 Length (in.): 36 Width (in.): 36
NYTMN (km.): 4508.8 NYTME (km.): 589.7

Emission Point: 00006
Height (ft.): 40 Length (in.): 36 Width (in.): 36

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NYTMN (km.): 4508.8 NYTME (km.): 589.7

Emission Point: 00007
 Height (ft.): 40 Length (in.): 36 Width (in.): 36
 NYTMN (km.): 4508.8 NYTME (km.): 589.7

Emission Point: 00009
 Height (ft.): 40 Length (in.): 36 Width (in.): 36
 NYTMN (km.): 4508.8 NYTME (km.): 589.7

Emission Point: 00010
 Height (ft.): 40 Length (in.): 36 Width (in.): 36
 NYTMN (km.): 4508.8 NYTME (km.): 589.7

Emission Point: 00014
 Height (ft.): 16 Diameter (in.): 4
 NYTMN (km.): 4508.8 NYTME (km.): 589.7

Emission Point: 00027
 Height (ft.): 8 Diameter (in.): 4
 NYTMN (km.): 4508.8 NYTME (km.): 589.7

Emission Point: 00032
 Height (ft.): 40 Diameter (in.): 36
 NYTMN (km.): 4508.8 NYTME (km.): 589.7

Emission Point: 00034
 Height (ft.): 5 Diameter (in.): 3
 NYTMN (km.): 4508.8 NYTME (km.): 589.7

Emission Point: 00035
 Height (ft.): 5 Diameter (in.): 4
 NYTMN (km.): 4508.8 NYTME (km.): 589.7

Emission Point: 00036
 Height (ft.): 5 Diameter (in.): 3
 NYTMN (km.): 4508.8 NYTME (km.): 589.7

Condition 46: Process Definition By Emission Unit
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 46.1(From Mod 2):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-TANKS
 Process: 001 Source Classification Code: 4-04-001-17
 Process Description:
 Process 001 is the storage and throughput of refined petroleum products, ethanol, and fuel additives within TANKS #1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 14, 27, 32, 34, 35,



36 & 41. All of these tanks are aboveground storage tanks at the facility. There are nine (9) bulk tanks containing internal floating roofs, two (2) bulk cone roof tanks, and six (6) smaller horizontal tanks. The nine (9) bulk tanks equipped with internal floating roofs are TANKS #2, 3, 4, 5, 6, 7, 8, 9 & 10, the two (2) bulk cone roof tanks are TANKS #1 & 32, and the six (6) smaller horizontal tanks are TANKS #14, 27, 34, 35, 36 & 41.

The nine (9) bulk tanks equipped with internal floating roofs, and two (2) of the horizontal tanks (TANKS #35 & 36) store products that include refined petroleum, are locally referred to as TANKS #2, 3, 4, 5, 6, 7, 8, 9, 10, 35 & 36. These same tanks (TANKS #2, 3, 4, 5, 6, 7, 8, 9, 10, 35 & 36) will have the flexibility of being used to store refined petroleum products (gasoline and distillate) with a vapor pressure of less than or equal to 76.6 kPa (11.1 psia) and denatured ethanol within these tanks. All of the noted tanks, with the exception of horizontal tanks, TANK #35 & 36 are equipped with an internal floating roof.

Potential to emit (PTE) calculations for these tanks were done utilizing gasoline with an RVP of 13. RVP 13 gasoline was chosen to represent an average vapor pressure for the products to be stored within these tanks. This is not intended to be interpreted as a restriction on the products stored within these tanks. BP reserves the right to store any liquid with a vapor pressure of less than or equal to 76.6 kPa (11.1 psia) within these tanks.

Process 001 is associated with Emission Unit U-TANKS, Emission Points 00001, 00002, 00003, 00004, 00005, 00006, 00007, 00008, 00009, 00010, 00014, 00027, 00032, 00034, 00035, 00036 & 00041 for Tanks # 2, 3, 4, 5, 6, 7, 8, 9, 10, 14, 27, 32, 34, 35, 36 & 41, and Emission Sources/Controls TAN01, TK02C, TK02P, TK03C, TK03P, TK04C, TK04P, TK05C, TK05P, TK06C, TK06P, TK07C, TK07P, TK08C, TK08P, TK09C, TK09P, TK10C, TK10P, TAN14, TAN27, TAN32, TAN34, TAN35, TAN36 & TAN41.

Emission Source/Control: TK02C - Control
Control Type: FLOATING ROOF

Emission Source/Control: TK03C - Control
Control Type: FLOATING ROOF

Emission Source/Control: TK04C - Control
Control Type: FLOATING ROOF

Emission Source/Control: TK05C - Control



Control Type: FLOATING ROOF

Emission Source/Control: TK06C - Control
Control Type: FLOATING ROOF

Emission Source/Control: TK07C - Control
Control Type: FLOATING ROOF

Emission Source/Control: TK08C - Control
Control Type: FLOATING ROOF

Emission Source/Control: TK09C - Control
Control Type: FLOATING ROOF

Emission Source/Control: TK10C - Control
Control Type: FLOATING ROOF

Emission Source/Control: TAN01 - Process
Design Capacity: 2,041,564 gallons

Emission Source/Control: TAN14 - Process
Design Capacity: 4,000 gallons

Emission Source/Control: TAN27 - Process
Design Capacity: 1,000 gallons

Emission Source/Control: TAN32 - Process
Design Capacity: 685,284 gallons

Emission Source/Control: TAN34 - Process
Design Capacity: 270 gallons

Emission Source/Control: TAN35 - Process
Design Capacity: 4,000 gallons

Emission Source/Control: TAN36 - Process
Design Capacity: 2,000 gallons

Emission Source/Control: TAN41 - Process
Design Capacity: 4,000 gallons

Emission Source/Control: TK02P - Process
Design Capacity: 449,663 gallons

Emission Source/Control: TK03P - Process
Design Capacity: 451,496 gallons

Emission Source/Control: TK04P - Process
Design Capacity: 451,348 gallons

Emission Source/Control: TK05P - Process
Design Capacity: 211,022 gallons



Emission Source/Control: TK06P - Process
Design Capacity: 431,177 gallons

Emission Source/Control: TK07P - Process
Design Capacity: 451,533 gallons

Emission Source/Control: TK08P - Process
Design Capacity: 684,540 gallons

Emission Source/Control: TK09P - Process
Design Capacity: 450,440 gallons

Emission Source/Control: TK10P - Process
Design Capacity: 450,440 gallons

Item 46.2(From Mod 2):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-TANKS

Process: 002

Source Classification Code: 4-04-001-14

Process Description:

Process 002 is the storage and throughput of refined petroleum products with a vapor pressure of less than or equal to 5.1 kPa (0.74 psia) in Tanks #1 & 32. These two tanks have cone roof. The two cone roof tanks are locally referred to as TANK #1 and TANK #32. Storage Tanks #1 and 32 potential to emit (PTE) calculations were performed using kerosene in order to represent a worst-case-scenario for products stored within these tanks. This is not intended to be interpreted as a restriction on the products stored within these tanks. BP reserves the right to store any liquid with a vapor pressure of less than or equal to 5.1 kPa (0.76 psia) within these tanks.

Process 002 is associated with Emission Unit U-TANKS, Emission Points 00001 & 00032 for Tanks #1 & 32, and Emission Sources/Controls TAN01 & TAN32.

Emission Source/Control: TAN01 - Process
Design Capacity: 2,041,564 gallons

Emission Source/Control: TAN32 - Process
Design Capacity: 685,284 gallons

Item 46.3(From Mod 2):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-TANKS

Process: 003

Source Classification Code: 4-04-001-22

Process Description:



Process 003 is the storage and throughput of refined petroleum products with a vapor pressure of less than or equal to 76.6 kPa (11.1 psia) in Tanks # 2, 3, 4, 5, 6, 7, 8, 9, 10, 35 & 36. The eight (8) tanks equipped with internal floating roofs and two (2) of the horizontal tanks are locally referred to as TANKS #2, 3, 4, 5, 6, 7, 8, 9, 10, 35 and 36. Tanks # 2, 3, 4, 5, 6, 7, 8, 9, 10, 35 and 36 will have the flexibility of being used to store refined petroleum products (gasoline and distillate) with a vapor pressure of less than or equal to 76.6 kPa (11.1 psia) and denatured ethanol within these tanks. All of the noted tanks with the exception of horizontal tanks #35 and 36 are equipped with an internal floating roof. Potential to emit (PTE) calculations for these tanks were done utilizing gasoline with an RVP of 13. RVP 13 gasoline was chosen to represent an average vapor pressure for the products to be stored within these tanks. This is not intended to be interpreted as a restriction on the products stored within these tanks. BP reserves the right to store any liquid with a vapor pressure of less than or equal to 76.6 kPa (11.1 psia) within these tanks.

Process 003 is associated with Emission Unit U-TANKS, Emission Points 00002, 00003, 00004, 00005, 00006, 00007, 00008, 00009, 00010, 00035 & 00036 for Tanks # 2, 3, 4, 5, 6, 7, 8, 9, 10, 35 & 36, and Emission Sources/Controls TK02C, TK02P, TK03C, TK03P, TK04C, TK04P, TK05C, TK05P, TK06C, TK06P, TK07C, TK07P, TK08C, TK08P, TK09C, TK09P, TK10C, TK10P, TAN35 & TAN36.

Emission Source/Control: TK02C - Control
Control Type: FLOATING ROOF

Emission Source/Control: TK03C - Control
Control Type: FLOATING ROOF

Emission Source/Control: TK04C - Control
Control Type: FLOATING ROOF

Emission Source/Control: TK05C - Control
Control Type: FLOATING ROOF

Emission Source/Control: TK06C - Control
Control Type: FLOATING ROOF

Emission Source/Control: TK07C - Control
Control Type: FLOATING ROOF

Emission Source/Control: TK08C - Control
Control Type: FLOATING ROOF



Emission Source/Control: TK09C - Control
Control Type: FLOATING ROOF

Emission Source/Control: TK10C - Control
Control Type: FLOATING ROOF

Emission Source/Control: TAN35 - Process
Design Capacity: 4,000 gallons

Emission Source/Control: TAN36 - Process
Design Capacity: 2,000 gallons

Emission Source/Control: TK02P - Process
Design Capacity: 449,663 gallons

Emission Source/Control: TK03P - Process
Design Capacity: 451,496 gallons

Emission Source/Control: TK04P - Process
Design Capacity: 451,348 gallons

Emission Source/Control: TK05P - Process
Design Capacity: 211,022 gallons

Emission Source/Control: TK06P - Process
Design Capacity: 431,177 gallons

Emission Source/Control: TK07P - Process
Design Capacity: 451,533 gallons

Emission Source/Control: TK08P - Process
Design Capacity: 684,540 gallons

Emission Source/Control: TK09P - Process
Design Capacity: 450,440 gallons

Emission Source/Control: TK10P - Process
Design Capacity: 450,440 gallons

Item 46.4(From Mod 2):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-TANKS

Process: 004

Source Classification Code: 4-04-001-21

Process Description:

Process 004 is the storage and throughput of fuel additives in Tanks # 14, 27, 34 & 41. These four tanks are horizontal tanks and are locally referred to as TANK #14, 27, 34 and 41. TANKS # 14, 27, 34 & 41 will be used to store fuel additives with a vapor pressure of less than or equal to 0.83 kPa (0.12 psia). Storage Tanks # 14, 27, 34 & 41 potential to emit (PTE) calculations were



performed using Xylene in order to represent a worst-case-scenario for the products stored within these tanks (Tanks # 14, 27, 34 & 41). This is not intended to be a restriction on the product stored within these tanks (Tanks # 14, 27, 34 & 41). BP reserves the right to store any liquid with a vapor pressure of equal to or less than 0.83 kPa (0.12 psia) within these tanks.

Process 004 is associated with Emission Unit U-TANKS, Emission Points 00014, 00027, 00034 & 00041 for Tanks # 14, 27, 34 & 41, and Emission Sources/Controls TAN14, TAN27, TAN34 & TAN41.

Emission Source/Control: TAN14 - Process
Design Capacity: 4,000 gallons

Emission Source/Control: TAN27 - Process
Design Capacity: 1,000 gallons

Emission Source/Control: TAN34 - Process
Design Capacity: 270 gallons

Emission Source/Control: TAN41 - Process
Design Capacity: 4,000 gallons

Item 46.5(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-DRACK
Process: 006 Source Classification Code: 4-04-001-54
Process Description:

Process 006 is the loading of refined petroleum products through the distillate loading rack (Emission Unit U-DRACK). The refined petroleum products will be limited to those products with a vapor pressure less than or equal to 5.1 kPa (0.74 psia).

Emission Unit U-DRACK consists of Emission Point DRACK, Process 006, and Emission Source/Control DRACK.

Emission Source/Control: DRACK - Process

Item 46.6(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-GRACK
Process: 005 Source Classification Code: 4-04-001-54
Process Description:

Process 005 is the loading of refined petroleum products and ethanol into transport vehicles through Emission Unit U-GRACK. The emissions resulting from the gasoline loading rack (Process 005) are controlled by a John Zinc Vapor

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Recovery Unit (Emission Sources/Controls 0AVRU, 0BVRU, 0OVRU and 0PVRU).

Emission Unit U-GRACK consists of Emission Point GRACK, Process 005, and Emission Sources/Controls 0AVRU, 0BVRU, 0OVRU and 0PVRU.

Emission Source/Control: 0BVRU - Control
Control Type: VAPOR RECOVERY SYSTEM (VAPOR ADSORPTION/ABSORPTION UNIT)

Emission Source/Control: 0PVRU - Control
Control Type: VAPOR RECOVERY SYSTEM (VAPOR ADSORPTION/ABSORPTION UNIT)

Emission Source/Control: 0AVRU - Process

Emission Source/Control: 0OVRU - Process

Condition 47: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.505(c), NSPS Subpart XX

Item 47.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-DRACK

Item 47.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Monthly terminal leak inspection records must be retained at the terminal for at least 5 years. Inspection records shall include, as a minimum, the following:

1. Inspection date
2. Findings (may indicate no leaks discovered; or location, nature, 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.

Monitoring Frequency: MONTHLY

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Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2007.
Subsequent reports are due every 12 calendar month(s).

Condition 48: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 225-1.8 (c)

Item 48.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-DRACK Emission Point: DRACK
Process: 006

Item 48.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Data on the sulfur content, specific gravity, and heating value of distillate oil will be maintained at the terminal for three (3) years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

Subsequent reports are due every 6 calendar month(s).

Condition 49: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.505(c), NSPS Subpart XX

Item 49.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-DRACK Emission Point: DRACK
Process: 006 Emission Source: DRACK

Item 49.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Monthly terminal leak inspection records must be retained at the terminal for at least 5 years. Inspection records shall include, as a minimum, the following:

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1. Inspection date
2. Findings (may indicate no leaks discovered; or location, nature, 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.

Monitoring Frequency: MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2007.
Subsequent reports are due every 12 calendar month(s).

Condition 50: Repairs to gasoline transport vehicles
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 230.4 (a) (2)

Item 50.1:

This Condition applies to Emission Unit: U-GRACK

Item 50.2:

No owner or operator of a gasoline transport vehicle subject to 6 NYCRR Part 230 will allow said vehicle to be filled or emptied unless the gasoline transport vehicle is repaired by the owner or operator within 15 days after failing to meet the pressure change standard in paragraph 230.4(a)(1) of 6 NYCRR Part 230.

Condition 51: Labelling of gasoline transport vehicles
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 230.4 (a) (3)

Item 51.1:

This Condition applies to Emission Unit: U-GRACK

Item 51.2:

No owner or operator of a gasoline transport vehicle subject to 6 NYCRR Part 230 will allow said vehicle to be filled or emptied unless the gasoline transport vehicle displays a marking, near the U.S. Department of Transportation certificate plate, in letters and numerals at least two inches high, which reads: NYS DEC and the date on which the gasoline transport vehicle was last tested.

Condition 52: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 230.4 (b)

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Item 52.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK

Item 52.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

All gasoline transport vehicles subject to this Part must be tested annually by the owner or his agent, using test methods acceptable to the commissioner. If the pressure-vacuum test does not show compliance with the pressure change standard, the gasoline transport vehicle must be repaired to make the tank vapor-tight, and retested.

Parameter Monitored: PRESSURE CHANGE

Upper Permit Limit: 3.0 inches of water

Reference Test Method: EPA Method 27

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

Condition 53: Leak limit

Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 230.4 (e)

Item 53.1:

This Condition applies to Emission Unit: U-GRACK

Item 53.2:

Leakage of vapors from any component of the gasoline transport vehicle or the vapor collection and control system must not equal or exceed 100 percent of the lower explosive limit measured as propane during the loading of a gasoline transport vehicle. No avoidable visible liquid leak from such components is allowed, including all piping, seals, hoses, connections, pressure-vacuum seals, and other possible leak sources.

Condition 54: Compliance Certification

Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 230.4 (f)

Item 54.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK

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Item 54.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No owner or operator of a gasoline transport vehicle will allow a compartment on said vehicle to be loaded under a pressure exceeding 18 inches of water gauge, to be unloaded under a vacuum exceeding 6 inches of water gauge, or to be unloaded under pressure.

Parameter Monitored: PRESSURE

Lower Permit Limit: 6.0 inches of water

Upper Permit Limit: 18.0 inches of water

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

Subsequent reports are due every 6 calendar month(s).

Condition 55: Compliance Certification

Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement: 6 NYCRR 230.6 (a)

Item 55.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK

Item 55.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner of any gasoline transport vehicle subject to this Part must maintain records of pressure-vacuum testings and repairs. The records must include the identity of the gasoline transport vehicle, the results of the testing, the date that the testing and repairs, as needed, were done, the nature of needed repairs and the date of retests where appropriate.

Testing records must be retained for two years and must be made available to the Department on request at any reasonable time.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

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Reports due 30 days after the reporting period.
The initial report is due 7/30/2006.
Subsequent reports are due every 6 calendar month(s).

Condition 56: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 230.6 (b)

Item 56.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK

Item 56.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A copy of the most recent pressure-vacuum test results,
in a form acceptable to the commissioner, must be kept
with the gasoline transport vehicle.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

Condition 57: Truck loading compatibility
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.502(f), NSPS Subpart XX

Item 57.1:
This Condition applies to Emission Unit: U-GRACK

Item 57.2:
Gasoline loading limited to trucks with vapor
collection equipment which is compatible
with the terminal vapor collection system.

Condition 58: Vapor collection connection required
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.502(g), NSPS Subpart XX

Item 58.1:
This Condition applies to Emission Unit: U-GRACK

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Item 58.2:

The terminal and tank truck vapor collection systems must be connected during gasoline loading.

Condition 59: Vent pressure limit
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.502(i), NSPS Subpart XX

Item 59.1:

This Condition applies to Emission Unit: U-GRACK

Item 59.2:

No pressure-vacuum vent in the terminal vapor collection system shall begin to open at a pressure less than 4,500 pascals.

Condition 60: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.502(j), NSPS Subpart XX

Item 60.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 60.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compound liquid or vapor leaks. Detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected.

Monthly terminal leak inspection records must be retained at the terminal for at least 5 years. Inspection records shall include, as a minimum, the following:

1. Inspection date
2. Findings (may indicate no leaks discovered; or



location, nature, 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.

Monitoring Frequency: MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

Condition 61: Compliance Certification

Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.505(c), NSPS Subpart XX

Item 61.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK

Item 61.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Monthly terminal leak inspection records must be retained at the terminal for at least 5 years. Inspection records shall include, as a minimum, the following:

1. Inspection date

2. Findings (may indicate no leaks discovered; or location, nature, 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.

Monitoring Frequency: MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

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Condition 62: Dome covers
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 230.4 (g)

Item 62.1:

This Condition applies to Emission Unit: U-GRACK
Process: 005

Item 62.2:

Dome covers on gasoline transport vehicles must be closed while the transport vehicle is being loaded.

Condition 63: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 229.3 (d)

Item 63.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK Emission Point: GRACK
Process: 005

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 63.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks are not to exceed 35 milligrams of total volatile organic compounds (VOC) per liter of gasoline loaded. BP is voluntarily accepting a lower limit of 10 mg/l. A performance test was conducted on the primary VRU on April 24, 2002 and tested at 0.89 mg/l. The facility is required to conduct another performance test on that unit within five (5) years of the April 24, 2002 date. The backup VRU is currently locked out of service. Prior to placing the backup VRU into service, a performance test must be performed.

Parameter Monitored: VOC

Upper Permit Limit: 10 milligrams per liter

Reference Test Method: USEPA METHOD 2A, 25A

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE



Condition 64: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 230.4 (a) (1)

Item 64.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK Emission Point: GRACK
Process: 005

Item 64.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No owner or operator of a gasoline transport vehicle subject to this Part will allow said vehicle to be filled or emptied unless the gasoline transport vehicle sustains a pressure change of not more than three (3) inches of water in five (5) minutes when pressurized to a gauge pressure of 18 inches of water and evacuated to a gauge pressure of six inches of water.

Manufacturer Name/Model Number: GASOLINE TRANSPORT VEHICLE

Parameter Monitored: PRESSURE CHANGE

Upper Permit Limit: 3.0 inches of water

Monitoring Frequency: PER DELIVERY

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -
SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

Subsequent reports are due every 6 calendar month(s).

Condition 65: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.502(e), NSPS Subpart XX

Item 65.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK Emission Point: GRACK
Process: 005

Item 65.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

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Monitoring Description:

As an alternative to keeping records at the terminal of each gasoline cargo test result as required in paragraphs (a), (c), and (d) of this section, an owner or operator may comply with requirements in either paragraph (e)(1) or (2) of this section:

(1) an electronic copy of each record is instantly available at the terminal,

(2) for facilities that utilize a terminal automation system to prevent gasoline cargo tanks that do not have a valid cargo tank vapor tightness documentation from loading, a copy of the documentation is made available for inspection by the permitting authority representatives during the course of a site visit or within a mutually agreeable time frame.

Reference Test Method: USEPA METHOD 27

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

Condition 66: Compliance Certification

Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.505(b), NSPS Subpart XX

Item 66.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK

Emission Point: GRACK

Process: 005

Item 66.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

1. Test title
2. Tank owner's name and address

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3. Tank identification number
4. Testing location
5. Date of test
6. Tester name and signature
7. Witnessing inspector
8. Test results: actual pressure change in 5 minutes, in mm of water (average of 2 runs).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

**Condition 67: Repairs to gasoline transport vehicles
Effective between the dates of 01/05/2006 and 01/04/2011**

Applicable Federal Requirement:6 NYCRR 230.4 (a) (2)

Item 67.1:

This Condition applies to Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source:

0AVRU

Item 67.2:

No owner or operator of a gasoline transport vehicle subject to 6 NYCRR Part 230 will allow said vehicle to be filled or emptied unless the gasoline transport vehicle is repaired by the owner or operator within 15 days after failing to meet the pressure change standard in paragraph 230.4(a)(1) of 6 NYCRR Part 230.

**Condition 68: Labelling of gasoline transport vehicles
Effective between the dates of 01/05/2006 and 01/04/2011**

Applicable Federal Requirement:6 NYCRR 230.4 (a) (3)

Item 68.1:

This Condition applies to Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source:

0AVRU

Item 68.2:

No owner or operator of a gasoline transport vehicle subject to 6 NYCRR Part 230 will allow said vehicle to be filled or emptied unless the gasoline transport vehicle displays a marking, near the U.S. Department of Transportation certificate plate, in letters and numerals at least two inches high, which reads: NYS DEC and the date on which the gasoline transport vehicle was

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last tested.

Condition 69: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 230.4 (b)

Item 69.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK
Process: 005

Emission Point: GRACK
Emission Source: 0AVRU

Item 69.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

All gasoline transport vehicles subject to this Part must be tested annually by the owner or his agent, using test methods acceptable to the commissioner. If the pressure-vacuum test does not show compliance with the pressure change standard, the gasoline transport vehicle must be repaired to make the tank vapor-tight, and retested.

Parameter Monitored: PRESSURE CHANGE

Upper Permit Limit: 3.0 inches of water

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

Condition 70: Leak limit
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 230.4 (e)

Item 70.1:

This Condition applies to Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source:
0AVRU

Item 70.2:

Leakage of vapors from any component of the gasoline transport vehicle or the vapor collection and control system must not equal or exceed 100 percent of the lower explosive limit measured as propane during the loading of a gasoline transport vehicle. No avoidable visible liquid leak from such components is allowed, including all piping, seals, hoses, connections, pressure-vacuum seals, and other possible leak sources.

Condition 71: Compliance Certification



Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 230.4 (f)

Item 71.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source: 0AVRU

Item 71.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No owner or operator of a gasoline transport vehicle will allow a compartment on said vehicle to be loaded under a pressure exceeding 18 inches of water gauge, to be unloaded under a vacuum exceeding 6 inches of water gauge, or to be unloaded under pressure.

Parameter Monitored: PRESSURE
Lower Permit Limit: 6.0 inches of water
Upper Permit Limit: 18.0 inches of water
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2006.
Subsequent reports are due every 6 calendar month(s).

Condition 72: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 230.6 (a)

Item 72.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source: 0AVRU

Item 72.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner of any gasoline transport vehicle subject to this Part must maintain records of pressure-vacuum testings and repairs. The records must include the identity of the gasoline transport vehicle, the results of

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the testing, the date that the testing and repairs, as needed, were done, the nature of needed repairs and the date of retests where appropriate.

Testing records must be retained for two years and must be made available to the Department on request at any reasonable time.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

Subsequent reports are due every 6 calendar month(s).

Condition 73: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 230.6 (b)

Item 73.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK

Emission Point: GRACK

Process: 005

Emission Source: 0AVRU

Item 73.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A copy of the most recent pressure-vacuum test results, in a form acceptable to the commissioner, must be kept with the gasoline transport vehicle.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

Condition 74: Truck loading compatibility
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.502(f), NSPS Subpart XX

Item 74.1:

This Condition applies to Emission Unit: U-GRACK Emission Point: GRACK

Process: 005

Emission Source:

0AVRU

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Item 74.2:

Gasoline loading limited to trucks with vapor collection equipment which is compatible with the terminal vapor collection system.

Condition 75: Vapor collection connection required
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.502(g), NSPS Subpart XX

Item 75.1:

This Condition applies to Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source:
0AVRU

Item 75.2:

The terminal and tank truck vapor collection systems must be connected during gasoline loading.

Condition 76: Vent pressure limit
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.502(i), NSPS Subpart XX

Item 76.1:

This Condition applies to Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source:
0AVRU

Item 76.2:

No pressure-vacuum vent in the terminal vapor collection system shall begin to open at a pressure less than 4,500 pascals.

Condition 77: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.502(j), NSPS Subpart XX

Item 77.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source: 0AVRU

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 77.2:

Compliance Certification shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compound liquid or vapor leaks. Detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected.

Monthly terminal leak inspection records must be retained at the terminal for at least 5 years. Inspection records shall include, as a minimum, the following:

1. Inspection date
2. Findings (may indicate no leaks discovered; or location, nature, 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.

Monitoring Frequency: MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

Condition 78: Compliance Certification

Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.505(c), NSPS Subpart XX

Item 78.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK
Process: 005

Emission Point: GRACK
Emission Source: 0AVRU

Item 78.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Monthly terminal leak inspection records must be retained at the terminal for at least 5 years. Inspection records shall include, as a minimum, the following:

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1. Inspection date
2. Findings (may indicate no leaks discovered; or location, nature, 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.

Monitoring Frequency: MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2007.
Subsequent reports are due every 12 calendar month(s).

Condition 79: Repairs to gasoline transport vehicles
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 230.4 (a) (2)

Item 79.1:

This Condition applies to Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source:
OBVRU

Item 79.2:

No owner or operator of a gasoline transport vehicle subject to 6 NYCRR Part 230 will allow said vehicle to be filled or emptied unless the gasoline transport vehicle is repaired by the owner or operator within 15 days after failing to meet the pressure change standard in paragraph 230.4(a)(1) of 6 NYCRR Part 230.

Condition 80: Labelling of gasoline transport vehicles
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 230.4 (a) (3)

Item 80.1:

This Condition applies to Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source:
OBVRU

Item 80.2:

No owner or operator of a gasoline transport vehicle subject to 6 NYCRR Part 230 will allow said vehicle to be filled or emptied unless the gasoline transport vehicle displays a marking, near the U.S. Department of Transportation certificate plate, in letters and numerals at least two inches high, which reads: NYS DEC and the date on which the gasoline transport vehicle was last tested.

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Condition 81: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 230.4 (b)

Item 81.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK
Process: 005

Emission Point: GRACK
Emission Source: 0BVRU

Item 81.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

All gasoline transport vehicles subject to this Part must be tested annually by the owner or his agent, using test methods acceptable to the commissioner. If the pressure-vacuum test does not show compliance with the pressure change standard, the gasoline transport vehicle must be repaired to make the tank vapor-tight, and retested.

Parameter Monitored: PRESSURE CHANGE

Upper Permit Limit: 3.0 inches of water

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

Condition 82: Leak limit
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 230.4 (e)

Item 82.1:

This Condition applies to Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source:
0BVRU

Item 82.2:

Leakage of vapors from any component of the gasoline transport vehicle or the vapor collection and control system must not equal or exceed 100 percent of the lower explosive limit measured as propane during the loading of a gasoline transport vehicle. No avoidable visible liquid leak from such components is allowed, including all piping, seals, hoses, connections, pressure-vacuum seals, and other possible leak sources.

Condition 83: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011



Applicable Federal Requirement:6 NYCRR 230.4 (f)

Item 83.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source: 0BVRU

Item 83.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No owner or operator of a gasoline transport vehicle will allow a compartment on said vehicle to be loaded under a pressure exceeding 18 inches of water gauge, to be unloaded under a vacuum exceeding 6 inches of water gauge, or to be unloaded under pressure.

Parameter Monitored: PRESSURE
Lower Permit Limit: 6.0 inches of water
Upper Permit Limit: 18.0 inches of water
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2006.
Subsequent reports are due every 6 calendar month(s).

Condition 84: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 230.6 (a)

Item 84.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source: 0BVRU

Item 84.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner of any gasoline transport vehicle subject to this Part must maintain records of pressure-vacuum testings and repairs. The records must include the identity of the gasoline transport vehicle, the results of the testing, the date that the testing and repairs, as

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needed, were done, the nature of needed repairs and the date of retests where appropriate.

Testing records must be retained for two years and must be made available to the Department on request at any reasonable time.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

Subsequent reports are due every 6 calendar month(s).

Condition 85: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 230.6 (b)

Item 85.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK

Emission Point: GRACK

Process: 005

Emission Source: 0BVRU

Item 85.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A copy of the most recent pressure-vacuum test results, in a form acceptable to the commissioner, must be kept with the gasoline transport vehicle.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

Condition 86: Truck loading compatibility
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.502(f), NSPS Subpart XX

Item 86.1:

This Condition applies to Emission Unit: U-GRACK Emission Point: GRACK

Process: 005

Emission Source:

0BVRU

Item 86.2:

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Gasoline loading limited to trucks with vapor collection equipment which is compatible with the terminal vapor collection system.

Condition 87: Vapor collection connection required
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.502(g), NSPS Subpart XX

Item 87.1:

This Condition applies to Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source:
OBVRU

Item 87.2:

The terminal and tank truck vapor collection systems must be connected during gasoline loading.

Condition 88: Vent pressure limit
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.502(i), NSPS Subpart XX

Item 88.1:

This Condition applies to Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source:
OBVRU

Item 88.2:

No pressure-vacuum vent in the terminal vapor collection system shall begin to open at a pressure less than 4,500 pascals.

Condition 89: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.502(j), NSPS Subpart XX

Item 89.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source: OBVRU

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 89.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

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Monitoring Description:

Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compound liquid or vapor leaks. Detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected.

Monthly terminal leak inspection records must be retained at the terminal for at least 5 years. Inspection records shall include, as a minimum, the following:

1. Inspection date
2. Findings (may indicate no leaks discovered; or location, nature, 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.

Monitoring Frequency: MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

Condition 90: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement: 40CFR 60.505(c), NSPS Subpart XX

Item 90.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK
Process: 005

Emission Point: GRACK
Emission Source: 0BVURU

Item 90.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Monthly terminal leak inspection records must be retained at the terminal for at least 5 years. Inspection records shall include, as a minimum, the following:



1. Inspection date
2. Findings (may indicate no leaks discovered; or location, nature, 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.

Monitoring Frequency: MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2007.
Subsequent reports are due every 12 calendar month(s).

Condition 91: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40 CFR Part 64

Item 91.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK	Emission Point: GRACK
Process: 005	Emission Source: 0BVRU

Item 91.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

This emission unit is subject to the Compliance Assurance Monitoring Rule (CAM Rule). The owner or operator of this emission unit must submit a plan to the Department for its review and approval showing how they will comply with this rule. The plan must include the following:

- An indicator to be monitored to show compliance with the applicable emission limit or standard.
- The ranges or designated conditions for such indicators, or the process by which such indicators ranges or designed conditions will be established.
- the performance criteria for the monitoring stated above
- if applicable, the indicator ranges and performance criteria for a CEMS, COMS or PEMS (if used).

The owner or operator of this emission unit shall submit an annual report of the monitoring required above. The



report shall include the following:

- summary of information on the number, duration and cause (including unknown cause) of excursions or exceedances, as applicable, and the corrective actions taken;
- summary information on the number, duration and cause (including unknown cause) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks if applicable); and
- a description of the actions taken to implement a Quality Improvement Plan (QIP) during the reporting period. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

Condition 92: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40 CFR Part 64

Item 92.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source: 0BVRU

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 92.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

COMPLIANCE ASSURANCE MONITORING PLAN

VOC emissions from BP's transport tanker truck loading operation are proposed to be permit-limited to not more than 10 mg/l. The only method of measuring actual compliance with this emissions requirement is defined as a test of at least 6 hours sampling time and processing at least 80,000 gallons of gasoline using the method given in



"Control of Hydrocarbons from Tank Truck from Gasoline Loading Terminals" EPA 450/2-77-026, Appendix A. This test is conducted every five years and is a long and complicated test. Therefore it is not practical to assure compliance on a very frequent basis using this test method.

However, BP has designed a four-stage monitoring plan to assure compliance with our permitted emission limit from transport tanker truck loading as follows:

Stage 1: Performing a compliance test using the prescribed EPA Method every five years. This is a defined test and is, by definition, the only method of verifying actual compliance with the mass emission limitation. BP will document each test and provide a copy to the agency.

Stage 2: Preventive maintenance by a contract VRU service company three times a year. The service representative checks the units during each visit to insure that all systems are working properly and to perform any scheduled preventive maintenance. We will document these events through manual log entries. Preventive maintenance or the lack thereof does not constitute compliance or non-compliance with the mass emission limitation but rather is a means to assure over the long term that the control unit remains in good condition and operates properly.

Stage 3: Daily check, per 40 CFR 64.3(b)(4)(iii), key performance indicators, that the vacuum and absorption processes of the VRU are operating properly. This is provided through daily checks of vacuum pulled on the carbon beds. To provide proper long-term regeneration, the vacuum pump should pull a maximum of at least 25 inches mercury of vacuum on the carbon beds during each cycle. BP will document these readings through daily and weekly manual log entries. The instantaneous maximum vacuum reading will be recorded each day on each bed of the VRU. The entire 15-minute regeneration cycle will be monitored weekly to ensure that the proper vacuum is maintained for the proper period of time.

Vacuum readings above or below 25 inches of mercury do not constitute compliance or non-compliance with the mass emission limitation but rather serve as indicators that if readings below the desired level occur, then the owner or operator should investigate the unit's operation to determine if maintenance or repair is needed to prevent possible eventual non-compliance with the mass emission limitation should the condition persist for an extended



period of time.

Stage 4: Daily pressure relief valve check: There is one source (a pressure relief device) in the vapor collection system that has a potential to allow vapor emissions from petroleum fuel loading operations to bypass the vapor control devices. This is the emergency vapor pressure relief valve on the vapor line between the truck loading rack and the VRU. The relief valve is set to relieve at 18-inches of water back-pressure and is designed to prevent over-pressuring of the tanker trucks should the VRU malfunction or shut down. The pressure gauge on this line will be monitored on a daily bases in order to ensure that the pressure relief device has not been activated.

As described above, the key indicators to assuring that the VRU is maintaining compliance with the mass emission limitation are:

1. The units are operating
2. The VRU carbon bed is adsorbing the VOCs
3. The VRU regeneration and absorption systems are operating properly
4. Knowing that no truck loading can occur when the VRU is not operating; and
5. Knowing that VRU carbon beds degrade very slowly over several years.

BP plans to monitor the above four-stage monitoring plan to assure that the vapor control unit is operating as designed. The Compliance Assurance Monitoring Plan includes periodic inspections, preventive maintenance, carbon bed operation, and actual compliance testing to provide an excellent monitoring plan to assure compliance with the mass emission limitation.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 93: Repairs to gasoline transport vehicles
Effective between the dates of 01/05/2006 and 01/04/2011**

Applicable Federal Requirement:6 NYCRR 230.4 (a) (2)

Item 93.1:

This Condition applies to Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source:
00VRU

Item 93.2:

No owner or operator of a gasoline transport vehicle subject to 6 NYCRR Part 230 will allow

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said vehicle to be filled or emptied unless the gasoline transport vehicle is repaired by the owner or operator within 15 days after failing to meet the pressure change standard in paragraph 230.4(a)(1) of 6 NYCRR Part 230.

Condition 94: Labelling of gasoline transport vehicles
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 230.4 (a) (3)

Item 94.1:

This Condition applies to Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source:
00VRU

Item 94.2:

No owner or operator of a gasoline transport vehicle subject to 6 NYCRR Part 230 will allow said vehicle to be filled or emptied unless the gasoline transport vehicle displays a marking, near the U.S. Department of Transportation certificate plate, in letters and numerals at least two inches high, which reads: NYS DEC and the date on which the gasoline transport vehicle was last tested.

Condition 95: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 230.4 (b)

Item 95.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source: 00VRU

Item 95.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

All gasoline transport vehicles subject to this Part must be tested annually by the owner or his agent, using test methods acceptable to the commissioner. If the pressure-vacuum test does not show compliance with the pressure change standard, the gasoline transport vehicle must be repaired to make the tank vapor-tight, and retested.

Parameter Monitored: PRESSURE CHANGE

Upper Permit Limit: 3.0 inches of water

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

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Condition 96: Leak limit
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 230.4 (e)

Item 96.1:

This Condition applies to Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source:
00VRU

Item 96.2:

Leakage of vapors from any component of the gasoline transport vehicle or the vapor collection and control system must not equal or exceed 100 percent of the lower explosive limit measured as propane during the loading of a gasoline transport vehicle. No avoidable visible liquid leak from such components is allowed, including all piping, seals, hoses, connections, pressure-vacuum seals, and other possible leak sources.

Condition 97: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 230.4 (f)

Item 97.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source: 00VRU

Item 97.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No owner or operator of a gasoline transport vehicle will allow a compartment on said vehicle to be loaded under a pressure exceeding 18 inches of water gauge, to be unloaded under a vacuum exceeding 6 inches of water gauge, or to be unloaded under pressure.

Parameter Monitored: PRESSURE

Lower Permit Limit: 6.0 inches of water

Upper Permit Limit: 18.0 inches of water

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

Subsequent reports are due every 6 calendar month(s).

Condition 98: Compliance Certification



Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 230.6 (a)

Item 98.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source: 00VRU

Item 98.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner of any gasoline transport vehicle subject to this Part must maintain records of pressure-vacuum testings and repairs. The records must include the identity of the gasoline transport vehicle, the results of the testing, the date that the testing and repairs, as needed, were done, the nature of needed repairs and the date of retests where appropriate.

Testing records must be retained for two years and must be made available to the Department on request at any reasonable time.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

Subsequent reports are due every 6 calendar month(s).

Condition 99: Compliance Certification

Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 230.6 (b)

Item 99.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source: 00VRU

Item 99.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A copy of the most recent pressure-vacuum test results, in a form acceptable to the commissioner, must be kept

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with the gasoline transport vehicle.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

Condition 100: Truck loading compatibility
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.502(f), NSPS Subpart XX

Item 100.1:

This Condition applies to Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source:

00VRU

Item 100.2:

Gasoline loading limited to trucks with vapor collection equipment which is compatible with the terminal vapor collection system.

Condition 101: Vapor collection connection required
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.502(g), NSPS Subpart XX

Item 101.1:

This Condition applies to Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source:

00VRU

Item 101.2:

The terminal and tank truck vapor collection systems must be connected during gasoline loading.

Condition 102: Vent pressure limit
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.502(i), NSPS Subpart XX

Item 102.1:

This Condition applies to Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source:

00VRU

Item 102.2:

No pressure-vacuum vent in the terminal vapor collection system shall begin to open at



a pressure less than 4,500 pascals.

Condition 103: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement: 40CFR 60.502(j), NSPS Subpart XX

Item 103.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source: 00VRU

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 103.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compound liquid or vapor leaks. Detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected.

Monthly terminal leak inspection records must be retained at the terminal for at least 5 years. Inspection records shall include, as a minimum, the following:

1. Inspection date
2. Findings (may indicate no leaks discovered; or location, nature, 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.

Monitoring Frequency: MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2007.
Subsequent reports are due every 12 calendar month(s).

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or operator within 15 days after failing to meet the pressure change standard in paragraph 230.4(a)(1) of 6 NYCRR Part 230.

Condition 106: Labelling of gasoline transport vehicles
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 230.4 (a) (3)

Item 106.1:

This Condition applies to Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source:
0PVRU

Item 106.2:

No owner or operator of a gasoline transport vehicle subject to 6 NYCRR Part 230 will allow said vehicle to be filled or emptied unless the gasoline transport vehicle displays a marking, near the U.S. Department of Transportation certificate plate, in letters and numerals at least two inches high, which reads: NYS DEC and the date on which the gasoline transport vehicle was last tested.

Condition 107: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 230.4 (b)

Item 107.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source: 0PVRU

Item 107.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

All gasoline transport vehicles subject to this Part must be tested annually by the owner or his agent, using test methods acceptable to the commissioner. If the pressure-vacuum test does not show compliance with the pressure change standard, the gasoline transport vehicle must be repaired to make the tank vapor-tight, and retested.

Parameter Monitored: PRESSURE CHANGE

Upper Permit Limit: 3.0 inches of water

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

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Condition 108: Leak limit
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 230.4 (e)

Item 108.1:

This Condition applies to Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source:
0PVRU

Item 108.2:

Leakage of vapors from any component of the gasoline transport vehicle or the vapor collection and control system must not equal or exceed 100 percent of the lower explosive limit measured as propane during the loading of a gasoline transport vehicle. No avoidable visible liquid leak from such components is allowed, including all piping, seals, hoses, connections, pressure-vacuum seals, and other possible leak sources.

Condition 109: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 230.4 (f)

Item 109.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source: 0PVRU

Item 109.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No owner or operator of a gasoline transport vehicle will allow a compartment on said vehicle to be loaded under a pressure exceeding 18 inches of water gauge, to be unloaded under a vacuum exceeding 6 inches of water gauge, or to be unloaded under pressure.

Parameter Monitored: PRESSURE

Lower Permit Limit: 6.0 inches of water

Upper Permit Limit: 18.0 inches of water

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

Subsequent reports are due every 6 calendar month(s).

Condition 110: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011



Applicable Federal Requirement:6 NYCRR 230.6 (a)

Item 110.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source: 0PVRU

Item 110.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner of any gasoline transport vehicle subject to this Part must maintain records of pressure-vacuum testings and repairs. The records must include the identity of the gasoline transport vehicle, the results of the testing, the date that the testing and repairs, as needed, were done, the nature of needed repairs and the date of retests where appropriate.

Testing records must be retained for two years and must be made available to the Department on request at any reasonable time.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

Subsequent reports are due every 6 calendar month(s).

Condition 111: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 230.6 (b)

Item 111.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source: 0PVRU

Item 111.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A copy of the most recent pressure-vacuum test results, in a form acceptable to the commissioner, must be kept with the gasoline transport vehicle.

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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

Condition 112: Truck loading compatibility
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.502(f), NSPS Subpart XX

Item 112.1:

This Condition applies to Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source:
OPVRU

Item 112.2:

Gasoline loading limited to trucks with vapor collection equipment which is compatible with the terminal vapor collection system.

Condition 113: Vapor collection connection required
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.502(g), NSPS Subpart XX

Item 113.1:

This Condition applies to Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source:
OPVRU

Item 113.2:

The terminal and tank truck vapor collection systems must be connected during gasoline loading.

Condition 114: Vent pressure limit
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.502(i), NSPS Subpart XX

Item 114.1:

This Condition applies to Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source:
OPVRU

Item 114.2:

No pressure-vacuum vent in the terminal vapor collection system shall begin to open at a pressure less than 4,500 pascals.

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Condition 115: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement: 40CFR 60.502(j), NSPS Subpart XX

Item 115.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source: OPVRU

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 115.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compound liquid or vapor leaks. Detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected.

Monthly terminal leak inspection records must be retained at the terminal for at least 5 years. Inspection records shall include, as a minimum, the following:

1. Inspection date
2. Findings (may indicate no leaks discovered; or location, nature, 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.

Monitoring Frequency: MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2007.
Subsequent reports are due every 12 calendar month(s).

Condition 116: Compliance Certification



Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.505(c), NSPS Subpart XX

Item 116.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source: 0PVRU

Item 116.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Monthly terminal leak inspection records must be retained at the terminal for at least 5 years. Inspection records shall include, as a minimum, the following:

1. Inspection date
2. Findings (may indicate no leaks discovered; or location, nature, 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.

Monitoring Frequency: MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2007.
Subsequent reports are due every 12 calendar month(s).

Condition 117: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40 CFR Part 64

Item 117.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source: 0PVRU

Item 117.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

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Monitoring Description:

This emission unit is subject to the Compliance Assurance Monitoring Rule (CAM Rule). The owner or operator of this emission unit must submit a plan to the Department for its review and approval showing how they will comply with this rule. The plan must include the following:

- An indicator to be monitored to show compliance with the applicable emission limit or standard.
- The ranges or designated conditions for such indicators, or the process by which such indicators ranges or designed conditions will be established.
- the performance criteria for the monitoring stated above
- if applicable, the indicator ranges and performance criteria for a CEMS, COMS or PEMS (if used).

The owner or operator of this emission unit shall submit an annual report of the monitoring required above. The report shall include the following:

- summary of information on the number, duration and cause (including unknown cause) of excursions or exceedances, as applicable, and the corrective actions taken;
- summary information on the number, duration and cause (including unknown cause) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks if applicable); and
- a description of the actions taken to implement a Quality Improvement Plan (QIP) during the reporting period. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

Condition 118: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40 CFR Part 64

Item 118.1:

The Compliance Certification activity will be performed for:



Emission Unit: U-GRACK Emission Point: GRACK
Process: 005 Emission Source: 0PVRU

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 118.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:
COMPLIANCE ASSURANCE MONITORING PLAN

VOC emissions from BP's transport tanker truck loading operation are proposed to be permit-limited to not more than 10 mg/l. The only method of measuring actual compliance with this emissions requirement is defined as a test of at least 6 hours sampling time and processing at least 80,000 gallons of gasoline using the method given in "Control of Hydrocarbons from Tank Truck from Gasoline Loading Terminals" EPA 450/2-77-026, Appendix A. This test is conducted every five years and is a long and complicated test. Therefore it is not practical to assure compliance on a very frequent basis using this test method.

However, BP has designed a four-stage monitoring plan to assure compliance with our permitted emission limit from transport tanker truck loading as follows:

Stage 1: Performing a compliance test using the prescribed EPA Method every five years. This is a defined test and is, by definition, the only method of verifying actual compliance with the mass emission limitation. BP will document each test and provide a copy to the agency.

Stage 2: Preventive maintenance by a contract VRU service company three times a year. The service representative checks the units during each visit to insure that all systems are working properly and to perform any scheduled preventive maintenance. We will document these events through manual log entries. Preventive maintenance or the lack thereof does not constitute compliance or non-compliance with the mass emission limitation but rather is a means to assure over the long term that the control unit remains in good condition and operates properly.

Stage 3: Daily check, per 40 CFR 64.3(b)(4)(iii), key performance indicators, that the vacuum and absorption



processes of the VRU are operating properly. This is provided through daily checks of vacuum pulled on the carbon beds. To provide proper long-term regeneration, the vacuum pump should pull a maximum of at least 25 inches mercury of vacuum on the carbon beds during each cycle. BP will document these readings through daily and weekly manual log entries. The instantaneous maximum vacuum reading will be recorded each day on each bed of the VRU. The entire 15-minute regeneration cycle will be monitored weekly to ensure that the proper vacuum is maintained for the proper period of time.

Vacuum readings above or below 25 inches of mercury do not constitute compliance or non-compliance with the mass emission limitation but rather serve as indicators that if readings below the desired level occur, then the owner or operator should investigate the unit's operation to determine if maintenance or repair is needed to prevent possible eventual non-compliance with the mass emission limitation should the condition persist for an extended period of time.

Stage 4: Daily pressure relief valve check: There is one source (a pressure relief device) in the vapor collection system that has a potential to allow vapor emissions from petroleum fuel loading operations to bypass the vapor control devices. This is the emergency vapor pressure relief valve on the vapor line between the truck loading rack and the VRU. The relief valve is set to relieve at 18-inches of water back-pressure and is designed to prevent over-pressuring of the tanker trucks should the VRU malfunction or shut down. The pressure gauge on this line will be monitored on a daily bases in order to ensure that the pressure relief device has not been activated.

As described above, the key indicators to assuring that the VRU is maintaining compliance with the mass emission limitation are:

1. The units are operating
2. The VRU carbon bed is adsorbing the VOCs
3. The VRU regeneration and absorption systems are operating properly
4. Knowing that no truck loading can occur when the VRU is not operating; and
5. Knowing that VRU carbon beds degrade very slowly over several years.

BP plans to monitor the above four-stage monitoring plan to assure that the vapor control unit is operating as designed. The Compliance Assurance Monitoring Plan includes periodic inspections, preventive maintenance,

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carbon bed operation, and actual compliance testing to provide an excellent monitoring plan to assure compliance with the mass emission limitation.

Parameter Monitored: VOC

Upper Permit Limit: 10 milligrams per liter

Reference Test Method: Method 25A or 25B

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 6-HOUR ROLLING AVERAGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 119: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 229.5 (a)

Item 119.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS

Item 119.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Recordkeeping of capacities of petroleum liquid storage tanks - Records must be maintained at the facility for five years

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

Condition 120: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 229.3 (a)

Item 120.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS

Emission Point: 00002

Process: 001

Emission Source: TK02C

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 120.2:

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Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The permittee must visually inspect the vapor collection and control systems per 40 CFR 60.113b(a)(1-4) every calendar quarter to ensure compliance with Part 229. The permittee must visually inspect the floating roof and secondary seals from the roof hatch on an annual basis. The permittee must perform a complete inspection of the floating roof and primary and secondary seals with the storage tank empty every ten (10) years per 40 CFR 60.113b(a)(1-4). Records of all inspections must be maintained on site for a period of five (5) years. Inspection records shall contain the dates of all inspections, inspection findings, and a listing of all equipment repairs or replacements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

Subsequent reports are due every 6 calendar month(s).

Condition 121: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement: 6 NYCRR 229.3 (e) (1)

Item 121.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS

Emission Point: 00002

Process: 001

Emission Source: TK02C

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 121.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For a fixed roof storage tank storing volatile organic liquids, the tanks must be equipped with an internal floating roof with a liquid-mounted primary seal and gasketed fittings or equivalent control. Replacement of other than liquid-mounted seals is to be performed when the tank is cleaned and gas-freed for other purposes.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

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DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

Condition 122: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 229.3 (a)

Item 122.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS

Emission Point: 00003

Process: 001

Emission Source: TK03C

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 122.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The permittee must visually inspect the vapor collection and control systems per 40 CFR 60.113b(a)(1-4) every calendar quarter to ensure compliance with Part 229. The permittee must visually inspect the floating roof and secondary seals from the roof hatch on an annual basis.

The permittee must perform a complete inspection of the floating roof and primary and secondary seals with the storage tank empty every ten (10) years per 40 CFR 60.113b(a)(1-4). Records of all inspections must be maintained on site for a period of five (5) years.

Inspection records shall contain the dates of all inspections, inspection findings, and a listing of all equipment repairs or replacements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

Subsequent reports are due every 6 calendar month(s).

Condition 123: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 229.3 (e) (1)

Item 123.1:

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The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS Emission Point: 00003
Process: 001 Emission Source: TK03C

Regulated Contaminant(s):
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Item 123.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For a fixed roof storage tank storing volatile organic liquids, the tanks must be equipped with an internal floating roof with a liquid-mounted primary seal and gasketed fittings or equivalent control. Replacement of other than liquid-mounted seals is to be performed when the tank is cleaned and gas-freed for other purposes.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

Condition 124: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 229.3 (a)

Item 124.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS Emission Point: 00004
Process: 001 Emission Source: TK04C

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 124.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The permittee must visually inspect the vapor collection and control systems per 40 CFR 60.113b(a)(1-4) every calendar quarter to ensure compliance with Part 229. The permittee must visually inspect the floating roof and secondary seals from the roof hatch on an annual basis. The permittee must perform a complete inspection of the

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floating roof and primary and secondary seals with the storage tank empty every ten (10) years per 40 CFR 60.113b(a)(1-4). Records of all inspections must be maintained on site for a period of five (5) years. Inspection records shall contain the dates of all inspections, inspection findings, and a listing of all equipment repairs or replacements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

Subsequent reports are due every 6 calendar month(s).

Condition 125: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 229.3 (e) (1)

Item 125.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS

Emission Point: 00004

Process: 001

Emission Source: TK04C

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 125.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For a fixed roof storage tank storing volatile organic liquids, the tanks must be equipped with an internal floating roof with a liquid-mounted primary seal and gasketed fittings or equivalent control. Replacement of other than liquid-mounted seals is to be performed when the tank is cleaned and gas-freed for other purposes.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

Condition 126: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 229.3 (a)

New York State Department of Environmental Conservation

Permit ID: 2-6101-00055/00021

Facility DEC ID: 2610100055



Item 126.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS Emission Point: 00005
Process: 001 Emission Source: TK05C

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 126.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The permittee must visually inspect the vapor collection and control systems per 40 CFR 60.113b(a)(1-4) every calendar quarter to ensure compliance with Part 229. The permittee must visually inspect the floating roof and secondary seals from the roof hatch on an annual basis. The permittee must perform a complete inspection of the floating roof and primary and secondary seals with the storage tank empty every ten (10) years per 40 CFR 60.113b(a)(1-4). Records of all inspections must be maintained on site for a period of five (5) years. Inspection records shall contain the dates of all inspections, inspection findings, and a listing of all equipment repairs or replacements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

Subsequent reports are due every 6 calendar month(s).

Condition 127: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 229.3 (e) (1)

Item 127.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS Emission Point: 00005
Process: 001 Emission Source: TK05C

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 127.2:

Compliance Certification shall include the following monitoring:

New York State Department of Environmental Conservation

Permit ID: 2-6101-00055/00021

Facility DEC ID: 2610100055



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For a fixed roof storage tank storing volatile organic liquids, the tanks must be equipped with an internal floating roof with a liquid-mounted primary seal and gasketed fittings or equivalent control. Replacement of other than liquid-mounted seals is to be performed when the tank is cleaned and gas-freed for other purposes.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

Condition 128: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement: 6 NYCRR 229.3 (a)

Item 128.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS

Emission Point: 00006

Process: 001

Emission Source: TK06C

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 128.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The permittee must visually inspect the vapor collection and control systems per 40 CFR 60.113b(a)(1-4) every calendar quarter to ensure compliance with Part 229. The permittee must visually inspect the floating roof and secondary seals from the roof hatch on an annual basis. The permittee must perform a complete inspection of the floating roof and primary and secondary seals with the storage tank empty every ten (10) years per 40 CFR 60.113b(a)(1-4). Records of all inspections must be maintained on site for a period of five (5) years. Inspection records shall contain the dates of all inspections, inspection findings, and a listing of all equipment repairs or replacements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

New York State Department of Environmental Conservation

Permit ID: 2-6101-00055/00021

Facility DEC ID: 2610100055



Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

Subsequent reports are due every 6 calendar month(s).

Condition 129: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 229.3 (e) (1)

Item 129.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS

Emission Point: 00006

Process: 001

Emission Source: TK06C

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 129.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For a fixed roof storage tank storing volatile organic liquids, the tanks must be equipped with an internal floating roof with a liquid-mounted primary seal and gasketed fittings or equivalent control. Replacement of other than liquid-mounted seals is to be performed when the tank is cleaned and gas-freed for other purposes.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

Condition 130: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 229.3 (a)

Item 130.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS

Emission Point: 00007

Process: 001

Emission Source: TK07C

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

New York State Department of Environmental Conservation

Permit ID: 2-6101-00055/00021

Facility DEC ID: 2610100055



Item 130.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The permittee must visually inspect the vapor collection and control systems per 40 CFR 60.113b(a)(1-4) every calendar quarter to ensure compliance with Part 229. The permittee must visually inspect the floating roof and secondary seals from the roof hatch on an annual basis. The permittee must perform a complete inspection of the floating roof and primary and secondary seals with the storage tank empty every ten (10) years per 40 CFR 60.113b(a)(1-4). Records of all inspections must be maintained on site for a period of five (5) years. Inspection records shall contain the dates of all inspections, inspection findings, and a listing of all equipment repairs or replacements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

Subsequent reports are due every 6 calendar month(s).

Condition 131: Compliance Certification

Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement: 6 NYCRR 229.3 (e) (1)

Item 131.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS

Emission Point: 00007

Process: 003

Emission Source: TK07C

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 131.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For a fixed roof storage tank storing volatile organic liquids, the tanks must be equipped with an internal floating roof with a liquid-mounted primary seal and gasketed fittings or equivalent control. Replacement of other than liquid-mounted seals is to be performed when the tank is cleaned and gas-freed for other purposes.



Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2007.
Subsequent reports are due every 12 calendar month(s).

Condition 2-10: Compliance Certification
Effective between the dates of 08/24/2010 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 229.3 (e) (1)

Item 2-10.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS Emission Point: 00008
Process: 003 Emission Source: TK08C

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 2-10.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

For a fixed roof storage tank storing volatile organic liquids, the tanks must be equipped with an internal floating roof with a liquid-mounted primary seal and gasketed fittings or equivalent control. Replacement of other than liquid-mounted seals is to be performed when the tank is cleaned and gas-freed for other purposes.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2011.
Subsequent reports are due every 12 calendar month(s).

Condition 2-11: Compliance Certification
Effective between the dates of 08/24/2010 and 01/04/2011

Applicable Federal Requirement:40CFR 60, NSPS Subpart Kb

Item 2-11.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS Emission Point: 00008
Process: 003 Emission Source: TK08C

Item 2-11.2:

New York State Department of Environmental Conservation

Permit ID: 2-6101-00055/00021

Facility DEC ID: 2610100055



Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility is to record and retain annual seal gap inspection results for at least three (3) years. Also, the facility is to retain accessible tank dimensions for the life of the tank. Finally, the facility is to maintain product storage records for at least three (3) years.

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2011.

Subsequent reports are due every 12 calendar month(s).

Condition 2-12: Compliance Certification
Effective between the dates of 08/24/2010 and 01/04/2011

Applicable Federal Requirement:40CFR 60.113b, NSPS Subpart Kb

Item 2-12.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS

Emission Point: 00008

Process: 003

Emission Source: TK08C

Item 2-12.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility is to record and retain annual seal gap inspection results for at least three (3) years. Also, the facility is to retain accessible tank dimensions for the life of the tank. Finally, the facility is to maintain product storage records for at least three (3) years.

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2011.

Subsequent reports are due every 12 calendar month(s).

Condition 2-13: Compliance Certification
Effective between the dates of 08/24/2010 and 01/04/2011

Applicable Federal Requirement:40CFR 60.113b(a)(2), NSPS Subpart

Kb

New York State Department of Environmental Conservation

Permit ID: 2-6101-00055/00021

Facility DEC ID: 2610100055



Item 2-13.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS Emission Point: 00008
Process: 003 Emission Source: TK08C

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 2-13.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For vessels equipped with a liquid-mounted or a mechanical shoe primary seal, the owner or operator shall visually inspect the internal floating roof and the primary seal (or the secondary seal if one exists) through manholes and roof hatches on the fixed roof at least once every twelve (12) months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2011.

Subsequent reports are due every 12 calendar month(s).

Condition 2-14: Compliance Certification

Effective between the dates of 08/24/2010 and 01/04/2011

Applicable Federal Requirement:40CFR 60.113b(a)(4), NSPS Subpart

Kb

Item 2-14.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS Emission Point: 00008
Process: 003 Emission Source: TK08C

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 2-14.2:

Compliance Certification shall include the following monitoring:

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Permit ID: 2-6101-00055/00021

Facility DEC ID: 2610100055



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator shall visually inspect the internal floating roof, the primary seal. The secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each the storage vessel is emptied and degassed. If the internal floating roof has defects, either seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10% open area, the owner or operator shall repair the items as necessary so that none of these conditions exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than ten (10) years in the case of vessels conducting the annual visual inspections as specified in 40 CFR 60.113b(a)(2) and at intervals of no greater than five (5) years in the case of vessels equipped with double seals that do not choose to perform the annual visual inspection option.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2011.

Subsequent reports are due every 6 calendar month(s).

Condition 2-15: Compliance Certification
Effective between the dates of 08/24/2010 and 01/04/2011

Applicable Federal Requirement:40CFR 60.113b(a)(5), NSPS Subpart

Kb

Item 2-15.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS

Emission Point: 00008

Process: 003

Emission Source: TK08C

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 2-15.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator shall notify the Administrator in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is

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required.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 132: Standards for VOCs.

Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.112b(a), NSPS Subpart Kb

Item 132.1:

This Condition applies to Emission Unit: U-TANKS Emission Point: 00009

Process: 001

Emission Source: TK09C

Item 132.2:

Petroleum liquids stored at vapor pressures of greater than or equal to 5.2 kPa and less than 76.6 kPa shall be stored in a vessel with a fixed roof in combination with an internal floating roof which meets the design criteria of section 40 CFR 60-Kb.112b.

Condition 133: Compliance Certification

Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.113b(a)(5), NSPS Subpart

Kb

Item 133.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS

Emission Point: 00009

Process: 001

Emission Source: TK09C

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 133.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator shall notify the Administrator in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 134: Compliance Certification

Effective between the dates of 01/05/2006 and 01/04/2011



Applicable Federal Requirement:6 NYCRR 229.3 (a)

Item 134.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS Emission Point: 00009
Process: 003 Emission Source: TK09C

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 134.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The permittee must visually inspect the vapor collection and control systems per 40 CFR 60.113b(a)(1-4) every calendar quarter to ensure compliance with Part 229. The permittee must visually inspect the floating roof and secondary seals from the roof hatch on an annual basis. The permittee must perform a complete inspection of the floating roof and primary and secondary seals with the storage tank empty every ten (10) years per 40 CFR 60.113b(a)(1-4). Records of all inspections must be maintained on site for a period of five (5) years. Inspection records shall contain the dates of all inspections, inspection findings, and a listing of all equipment repairs or replacements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

Subsequent reports are due every 6 calendar month(s).

Condition 135: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 229.3 (e) (1)

Item 135.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS Emission Point: 00009
Process: 003 Emission Source: TK09C

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

New York State Department of Environmental Conservation

Permit ID: 2-6101-00055/00021

Facility DEC ID: 2610100055



Item 135.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For a fixed roof storage tank storing volatile organic liquids, the tanks must be equipped with an internal floating roof with a liquid-mounted primary seal and gasketed fittings or equivalent control. Replacement of other than liquid-mounted seals is to be performed when the tank is cleaned and gas-freed for other purposes.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

Condition 136: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60, NSPS Subpart Kb

Item 136.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS

Emission Point: 00009

Process: 003

Emission Source: TK09C

Item 136.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility is to record and retain annual seal gap inspection results for at least three (3) years. Also, the facility is to retain accessible tank dimensions for the life of the tank. Finally, the facility is to maintain product storage records for at least three (3) years.

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

Condition 137: Standards for VOCs.
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.112b(a), NSPS Subpart Kb

New York State Department of Environmental Conservation

Permit ID: 2-6101-00055/00021

Facility DEC ID: 2610100055



Item 137.1:

This Condition applies to Emission Unit: U-TANKS Emission Point: 00009
Process: 003 Emission Source: TK09C

Item 137.2:

Petroleum liquids stored at vapor pressures of greater than or equal to 5.2 kPa and less than 76.6 kPa shall be stored in a vessel with a fixed roof in combination with an internal floating roof which meets the design criteria of section 40 CFR 60-Kb.112b.

Condition 138: Compliance Certification

Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.113b, NSPS Subpart Kb

Item 138.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS Emission Point: 00009
Process: 003 Emission Source: TK09C

Item 138.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility is to record and retain annual seal gap inspection results for at least three (3) years. Also, the facility is to retain accessible tank dimensions for the life of the tank. Finally, the facility is to maintain product storage records for at least three (3) years.

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

Condition 139: Compliance Certification

Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.113b(a)(2), NSPS Subpart

Kb

Item 139.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS Emission Point: 00009
Process: 003 Emission Source: TK09C

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Permit ID: 2-6101-00055/00021

Facility DEC ID: 2610100055



Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 139.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For vessels equipped with a liquid-mounted or a mechanical shoe primary seal, the owner or operator shall visually inspect the internal floating roof and the primary seal (or the secondary seal if one exists) through manholes and roof hatches on the fixed roof at least once every twelve (12) months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

Condition 140: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.113b(a)(4), NSPS Subpart

Kb

Item 140.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS Emission Point: 00009
Process: 003 Emission Source: TK09C

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 140.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator shall visually inspect the internal floating roof, the primary seal. The secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each the storage vessel is emptied and

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Permit ID: 2-6101-00055/00021

Facility DEC ID: 2610100055



degassed. If the internal floating roof has defects, either seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10% open area, the owner or operator shall repair the items as necessary so that none of these conditions exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than ten (10) years in the case of vessels conducting the annual visual inspections as specified in 40 CFR 60.113b(a)(2) and at intervals of no greater than five (5) years in the case of vessels equipped with double seals that do not choose to perform the annual visual inspection option.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

Subsequent reports are due every 6 calendar month(s).

Condition 141: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement: 40CFR 60.113b(a)(5), NSPS Subpart

Kb

Item 141.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS

Emission Point: 00009

Process: 003

Emission Source: TK09C

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 141.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator shall notify the Administrator in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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Permit ID: 2-6101-00055/00021

Facility DEC ID: 2610100055



Condition 142: Standards for VOCs.

Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.112b(a), NSPS Subpart Kb

Item 142.1:

This Condition applies to Emission Unit: U-TANKS Emission Point: 00010
Process: 001 Emission Source: TK10C

Item 142.2:

Petroleum liquids stored at vapor pressures of greater than or equal to 5.2 kPa and less than 76.6 kPa shall be stored in a vessel with a fixed roof in combination with an internal floating roof which meets the design criteria of section 40 CFR 60-Kb.112b.

Condition 143: Compliance Certification

Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.113b(a)(5), NSPS Subpart

Kb

Item 143.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS Emission Point: 00010
Process: 001 Emission Source: TK10C

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 143.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator shall notify the Administrator in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 144: Compliance Certification

Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 229.3 (a)

Item 144.1:

The Compliance Certification activity will be performed for:

New York State Department of Environmental Conservation

Permit ID: 2-6101-00055/00021

Facility DEC ID: 2610100055



Emission Unit: U-TANKS
Process: 003

Emission Point: 00010
Emission Source: TK10C

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 144.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The permittee must visually inspect the vapor collection and control systems per 40 CFR 60.113b(a)(1-4) every calendar quarter to ensure compliance with Part 229. The permittee must visually inspect the floating roof and secondary seals from the roof hatch on an annual basis.

The permittee must perform a complete inspection of the floating roof and primary and secondary seals with the storage tank empty every ten (10) years per 40 CFR 60.113b(a)(1-4). Records of all inspections must be maintained on site for a period of five (5) years.

Inspection records shall contain the dates of all inspections, inspection findings, and a listing of all equipment repairs or replacements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

Subsequent reports are due every 6 calendar month(s).

Condition 145: Compliance Certification

Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:6 NYCRR 229.3 (e) (1)

Item 145.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS
Process: 003

Emission Point: 00010
Emission Source: TK10C

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 145.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For a fixed roof storage tank storing volatile organic

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liquids, the tanks must be equipped with an internal floating roof with a liquid-mounted primary seal and gasketed fittings or equivalent control. Replacement of other than liquid-mounted seals is to be performed when the tank is cleaned and gas-freed for other purposes.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

Condition 146: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60, NSPS Subpart Kb

Item 146.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS

Emission Point: 00010

Process: 003

Emission Source: TK10C

Item 146.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility is to record and retain annual seal gap inspection results for at least three (3) years. Also, the facility is to retain accessible tank dimensions for the life of the tank. Finally, the facility is to maintain product storage records for at least three (3) years.

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

Condition 147: Standards for VOCs.
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.112b(a), NSPS Subpart Kb

Item 147.1:

This Condition applies to Emission Unit: U-TANKS Emission Point: 00010

Process: 003

Emission Source: TK10C

Item 147.2:

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Petroleum liquids stored at vapor pressures of greater than or equal to 5.2 kPa and less than 76.6 kPa shall be stored in a vessel with a fixed roof in combination with an internal floating roof which meets the design criteria of section 40 CFR 60-Kb.112b.

Condition 148: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.113b, NSPS Subpart Kb

Item 148.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS	Emission Point: 00010
Process: 003	Emission Source: TK10C

Item 148.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility is to record and retain annual seal gap inspection results for at least three (3) years. Also, the facility is to retain accessible tank dimensions for the life of the tank. Finally, the facility is to maintain product storage records for at least three (3) years.

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2007.
Subsequent reports are due every 12 calendar month(s).

Condition 149: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.113b(a)(2), NSPS Subpart

Kb

Item 149.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS	Emission Point: 00010
Process: 003	Emission Source: TK10C

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 149.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES



Monitoring Description:

For vessels equipped with a liquid-mounted or a mechanical shoe primary seal, the owner or operator shall visually inspect the internal floating roof and the primary seal (or the secondary seal if one exists) through manholes and roof hatches on the fixed roof at least once every twelve (12) months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

Condition 150: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.113b(a)(4), NSPS Subpart

Kb

Item 150.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS

Emission Point: 00010

Process: 003

Emission Source: TK10C

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 150.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator shall visually inspect the internal floating roof, the primary seal. The secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each the storage vessel is emptied and degassed. If the internal floating roof has defects, either seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10% open area, the owner or operator shall repair the items as necessary so that none of these conditions exist before refilling the storage

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vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than ten (10) years in the case of vessels conducting the annual visual inspections as specified in 40 CFR 60.113b(a)(2) and at intervals of no greater than five (5) years in the case of vessels equipped with double seals that do not choose to perform the annual visual inspection option.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

Subsequent reports are due every 6 calendar month(s).

Condition 151: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.113b(a)(5), NSPS Subpart

Kb

Item 151.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-TANKS

Emission Point: 00010

Process: 003

Emission Source: TK10C

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 151.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator shall notify the Administrator in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 152: Compliance Certification
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable Federal Requirement:40CFR 60.116b, NSPS Subpart Kb

Item 152.1:

The Compliance Certification activity will be performed for:

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Emission Unit: U-TANKS
Process: 002

Emission Point: 00032
Emission Source: TAN32

Item 152.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility is to retain accessible tank dimensions for the life of the tank. Also, the facility is to maintain product storage records for at least two (2) years.

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).



STATE ONLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS
This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS
The following conditions are state applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.

Condition 153: Contaminant List
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable State Requirement:ECL 19-0301

Item 153.1:
Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 000071-43-2
Name: BENZENE



CAS No: 000108-88-3
Name: TOLUENE

CAS No: 000110-54-3
Name: HEXANE

CAS No: 001330-20-7
Name: XYLENE, M, O & P MIXT.

CAS No: 0NY100-00-0
Name: HAP

CAS No: 0NY998-00-0
Name: VOC

**Condition 2-16: Unavoidable noncompliance and violations
Effective between the dates of 08/24/2010 and 01/04/2011**

Applicable State Requirement:6 NYCRR 201-1.4

Item 2-16.1:

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

(a) The facility owner and/or operator shall compile and maintain records of all equipment maintenance or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.



(c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

Condition 2-17: Air pollution prohibited
Effective between the dates of 08/24/2010 and 01/04/2011

Applicable State Requirement:6 NYCRR 211.2

Item 2-17.1:

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. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

Condition 156: Compliance Demonstration
Effective between the dates of 01/05/2006 and 01/04/2011

Applicable State Requirement:6 NYCRR 211.2

Item 156.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 156.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility to establish a complaint response procedure to manage complaints related to air emissions from the facility. The procedure shall be designed to ensure that complaints from officials and neighbors are adequately received and documented, and that the appropriate response is taken by the facility. The facility shall:

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1. Have a complaint phone line available 24 hours a day, 7 days a week.
2. Investigate any possible causes of any complaint received.
3. Take prompt action to abate any circumstances which is found to be the cause of the complaint.
4. Fully document the complaint, results of the investigation, and any action taken.
5. Report in a format acceptable to the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

Subsequent reports are due every 6 calendar month(s).

