



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

**Permit ID: 2-6101-00055/00021**

**Renewal Number: 2**

**07/26/2011**

**Facility Identification Data**

Name: BP PRODUCTS N AMERICA BROOKLYN TERMINAL

Address: 125 APOLLO ST

BROOKLYN, NY 11222

**Owner/Firm**

Name: BP PRODUCTS NORTH AMERICA INC

Address: 28100 TORCH PKWY

WARRENVILLE, IL 60555, USA

Owner Classification: Corporation/Partnership

**Permit Contacts**

Division of Environmental Permits:

Name: ELIZABETH A CLARKE

Address: NYSDEC

47-40 21ST ST

LONG ISLAND CITY, NY 11101-5407

Phone:7184824997

Division of Air Resources:

Name: DIANA MENASHA

Address: NYSDEC REGION 2 OFFICE

HUNTERS POINT PLAZA

LONG ISLAND CITY, NY 11101

Phone:7184827263

Air Permitting Contact:

Name: ERIC W SAUERMAN

Address: BP PRODUCTS NORTH AMERICA

125 APOLLO ST

BROOKLYN, NY 11222

Phone:7183895966

**Permit Description**

**Introduction**

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

**Summary Description of Proposed Project**

Application for renewal of Air Title V Facility.

BP Products North America (BP) owns and operates a bulk petroleum storage and distribution terminal



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

**Permit ID: 2-6101-00055/00021**

**Renewal Number: 2**

**07/26/2011**

under Title V permit # 2-6101-00055/00021. BP is submitting this Title V renewal #2 application in accordance with 6 NYCRR 621.3. This renewal application incorporates minor terminal changes and newly promulgated regulation since the previous Title V renewal was submitted in December 2004 and issued on 1/5/2006. BP intends to operate under the throughput and VOC emissions limits contained in the existing permit (600,000,000 gallons per year).

The renewal #2 application incorporates 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 under Title V permit # 2-6101-00055/00021 (Ren 1, Mod 1) and was issued on 1/4/2011.

The renewal #2 application incorporates applicable requirements from 40 CFR Part 63, Subparts BBBBBB and ZZZZ, which were promulgated since the previous Title V Renewal #1 was issued on 1/5/2006. In addition, this application identifies Barge Loading of recovered petroleum products from the Terminal's groundwater treatment system. This intermittent emission source is included as Process 007 in Emission Unit U-DRACK.

**Attainment Status**

BP PRODUCTS N AMERICA BROOKLYN TERMINAL is located in the town of BROOKLYN in the county of KINGS.

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

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

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

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

**Facility Description:**

The 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 is a bulk terminal with two loading racks to load gasoline, distillates, denatured ethanol and additives into truck tanks. This facility stores gasoline, distillates, denatured ethanol, and gasoline



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

**Permit ID: 2-6101-00055/00021**

**Renewal Number: 2**

**07/26/2011**

additives prior to distribution. Product is received into the storage tanks via pipeline, truck and barge. Product is distributed via truck loading racks. The facility consists of eleven (11) active 40-foot tall above-ground bulk petroleum storage tanks for storage of (gasoline, distillates and denatured ethanol prior to distribution), six (6) smaller tanks (additives, slop, etc.), a four-bay gasoline truck loading rack, a five-bay distillate truck loading rack, and two (2) vapor recovery units. Products stored within these seventeen (17) tanks include refined petroleum products, ethanol, and fuel additives. 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 nine (9) tanks equipped with internal floating roofs and one (1) of the horizontal tanks are locally referred to as Tanks #2, 3, 4, 5, 6, 7, 8, 9, 10 and 35 and are surrounded by steel dike walls. One of the nine (9) tanks with an internal floating roof (Tank # 5) serves the site's remediation system and stores recovered petroleum products. Tanks #2, 3, 4, 5, 6, 7, 8, 9, 10 and 35 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 Tank #35, are equipped with an internal floating roof and are therefore capable of storing Volatile Organic Compounds with vapor pressure less than 11.5 psia. 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) bulk cone roof storage tanks are locally referred to as Tank #1 and Tank #32 and are surrounded by steel dike walls. These two tanks are vertical and are therefore not fitted with internal floating roofs. 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 two tanks. This is not intended to be interpreted as a restriction on the products stored within these two 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 two tanks.

The five (5) remaining horizontal storage tanks are locally referred to as Tank #14, 27, 34, 37 and 41. Tanks #14, 27, 34, 37 and 41 are limited to storing 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.

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, 14, 27, 32, 34 and 36. 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 the tanks to storing RVP



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

**Permit ID: 2-6101-00055/00021**

**Renewal Number: 2**

**07/26/2011**

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.

The bulk distillate storage tanks (Tanks # 1 and 32) and the horizontal storage tanks at this facility (Tanks # 14, 27, 34, 37 & 41) are exempt from the Title V application in accordance with 6 NYCRR Part 201-3.2(c)(26). Also, horizontal storage Tank #36 containing slop is exempt from permitting. 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.

Control Description: The VRU is designed to process the VOC vapors vented from the four bay gasoline loading rack. The unit currently meets BP's permitted emission limit of 10 milligrams of VOC vented per liter of gasoline loaded at the loading rack (i.e. 10 mg/l) as demonstrated during the 5/31/2007 stack test with a result of 0.26 mg/l. The overall VOC emissions cap from the facility will remain at 76.52 tons per year of VOC.

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, two (2) fuel oil storage tanks (Tanks #1 and 32) with storage capacities < 300,000 bbls and five (5) horizontal petroleum storage tanks which are Tanks # 14, # 27, # 34, # 37 & # 41. In addition horizontal storage Tank #36 containing slop is exempt from permitting.

**Permit Structure and Description of Operations**

The Title V permit for BP PRODUCTS N AMERICA BROOKLYN TERMINAL

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

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

BP PRODUCTS N AMERICA BROOKLYN TERMINAL is defined by the following emission unit(s):

Emission unit UDRACK - 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).



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

**Permit ID: 2-6101-00055/00021**

**Renewal Number: 2**

**07/26/2011**

Barge loading of recovered petroleum product from the Terminal's remediation system is also included in Emission Unit U-DRACK. Approximately 2-3 times per year, weathered petroleum products are loaded onto barges at the vessel dock and sent for further processing/treatment.

Emission Unit U-DRACK consists of Emission Points DRACK and BARGE, Processes 006 & 070 and Emission Sources/Controls DRACK & BARGE; respectively.

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

BARGE, DRACK

Process: 006 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 Points DRACK & BARGE, Processes 006 & 070, and Emission Sources/Controls DRACK & BARGE; respectively.

Process: 070 Process 070 is the barge loading of recovered petroleum products (with vapor pressure less than 4.0 psia) to barges for further treatment /processing.

Emission Unit U-DRACK consists of Emission Points DRACK & BARGE, Processes 006 & 070, and Emission Sources/Controls DRACK & BARGE; respectively.

Emission unit UGRACK - 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 (back-up or primary; respectively - 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.

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

GRACK

Process: 005 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 Recovery Unit (Emission Sources/Controls 0AVRU/0BVRU and



New York State Department of Environmental Conservation  
Permit Review Report

Permit ID: 2-6101-00055/00021

Renewal Number: 2

07/26/2011

00VRU/0PVURU).

Emission Unit U-GRACK consists of Emission Point GRACK, Process 005, and Emission Sources/Controls 0AVRU/0BVRU and 00VRU/0PVURU.

Emission unit UTANKS - Emission Unit U-TANKS is defined as all of the above-ground product 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 one (1) of the horizontal tanks are locally referred to as Tanks #2, 3, 4, 5, 6, 7, 8, 9, 10 and 35. Tanks #2, 3, 4, 5, 6, 7, 8, 9, 10 and 35 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 Tank #35, 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 five (5) remaining horizontal tanks are locally referred to as Tank #14, 27, 34, 37 and 41. Tanks #14, 27, 34, 37 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, 00037 & 00041 referring to each of the storage tanks, Processes 001, 002, 003 & 004, and Emission Sources/Controls TAN01, TK02P, TK02C, TK03P, TK03C, TK04P, TK04C, TK05P, TK05C, TK06P, TK06C, TK07P, TK07C, TK08P, TK08C, TK09P, TK09C, TK10P, TK10C, TAN14, TAN27, TAN32, TAN34, TAN35, TAN37 & TAN41.

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

00001, 00002, 00003, 00004, 00005, 00006, 00007, 00008, 00009, 00010, 00014, 00027, 00032, 00034, 00035, 00037, 00041

Process: 001 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, 37 & 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



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

**Permit ID: 2-6101-00055/00021**

**Renewal Number: 2**

**07/26/2011**

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 one (1) of the horizontal tanks (TANKS #35) store products that include refined petroleum, are locally referred to as TANKS #2, 3, 4, 5, 6, 7, 8, 9, 10 & 35. These same tanks (TANKS #2, 3, 4, 5, 6, 7, 8, 9, 10 & 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 is 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, 00037 & 00041 for Tanks # 2, 3, 4, 5, 6, 7, 8, 9, 10, 14, 27, 32, 34, 35, 37 & 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, TAN37 & TAN41.

Process: 002 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 a 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.

Process: 003 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. The nine (9) tanks equipped with internal floating roofs and one (1) of the horizontal tanks are locally referred to as TANKS #2, 3, 4, 5, 6, 7, 8, 9, 10 and 35. Tanks # 2, 3, 4, 5, 6, 7, 8, 9, 10 and 35 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 tank #35, 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 for Tanks # 2, 3, 4, 5, 6, 7, 8, 9, 10 & 35, and Emission Sources/Controls TK02P, TK02C, TK03P, TK03C, TK04P, TK04C, TK05P, TK05C, TK06P, TK06C, TK07P, TK07C, TK08P, TK08C, TK09P, TK09C, TK10P, TK10C and TAN35.



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

**Permit ID: 2-6101-00055/00021**

**Renewal Number: 2**

**07/26/2011**

These five (5) tanks are horizontal tanks and are locally referred to as TANK #14, 27, 34, 37 and 41. TANKS # 14, 27, 34, 37 & 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, 37 and 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, 37 and 41). This is not intended to be a restriction on the product stored within these tanks (Tanks # 14, 27, 34, 37 and 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, 00037 & 00041 for Tanks # 14, 27, 34, 37 & 41, and Emission Sources/Controls TAN14, TAN27, TAN34, TAN37 & TAN41.

**Title V/Major Source Status**

BP PRODUCTS N AMERICA BROOKLYN TERMINAL is subject to Title V requirements. This determination is based on the following information:

BP Products North America Inc. - Brooklyn terminal is a major facility because the potential emissions of volatile organic compounds (VOC) is greater than the major source thresholds, which is 25 tons per year for VOC.

**Program Applicability**

The following chart summarizes the applicability of BP PRODUCTS N AMERICA BROOKLYN TERMINAL with regards to the principal air pollution regulatory programs:

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

**NOTES:**

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

**NSR** New Source Review (6 NYCRR Part 231) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards



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

**Permit ID: 2-6101-00055/00021**

**Renewal Number: 2**

**07/26/2011**

(NAAQS)  
for specified pollutants.

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

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

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

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

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

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

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

**Compliance Status**

Facility is in compliance with all requirements.

**SIC Codes**

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



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

**Permit ID: 2-6101-00055/00021**

**Renewal Number: 2**

**07/26/2011**

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

**SIC Code**

**Description**

5171

PETROLEUM BULK STATIONS & TERMINALS

**SCC Codes**

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

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

**SCC Code**

**Description**

4-04-001-14

BULK TERMINALS/PLANTS  
BULK TERMINALS  
GASOLINE RVP 10: STANDING LOSS (250000  
BBL.CAPACITY) FLOATING ROOF TANK

4-04-001-17

BULK TERMINALS/PLANTS  
BULK TERMINALS  
GASOLINE RVP13/RVP10/RVP7: WITHDRAWAL LOSS  
(250000 BBL) FLOATING ROOF

4-04-001-21

BULK TERMINALS/PLANTS  
BULK TERMINALS  
FIXED ROOF TANKS (TANK DIA INDEPENDANT) -  
DIESEL FUEL-STANDING LOSS

4-04-001-22

BULK TERMINALS/PLANTS  
BULK TERMINALS  
FIXED ROOF TANKS (TANK DIAMETER  
INDEPENDANT) -DIESEL FUEL-WORKING LOSS

4-04-001-54

BULK TERMINALS/PLANTS  
BULK TERMINALS  
Tank Truck Vapor Leaks

**Facility Emissions Summary**

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



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

**Permit ID: 2-6101-00055/00021**

**Renewal Number: 2**

**07/26/2011**

CAS No. ONY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE	Range
		lbs/yr	
000108-38-3	1,3 DIMETHYL BENZENE	642	
000071-43-2	BENZENE	424	
000098-82-8	BENZENE, (1-METHYLETHYL)	4.4	
000100-41-4	ETHYLBENZENE	86	
ONY100-00-0	HAP	4942	
000110-54-3	HEXANE	2171	
000540-84-1	PENTANE, 2,2,4-TRIMETHYL-	770	
000108-88-3	TOLUENE	845	
ONY998-00-0	VOC	153039	
001330-20-7	XYLENE, M, O & P MIXT.	640	

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**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 Part 201-6.3(a)(4)**



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

**Permit ID: 2-6101-00055/00021**

**Renewal Number: 2**

**07/26/2011**

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

**Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(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 Part 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 Part 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 Part 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 Part 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



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

**Permit ID: 2-6101-00055/00021**

**Renewal Number: 2**

**07/26/2011**

abatement authority. Nothing in this permit shall alter or affect the following:

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

**Item K: Reopening for Cause - 6 NYCRR Part 201-6.5(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



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

**Permit ID: 2-6101-00055/00021**

**Renewal Number: 2**

**07/26/2011**

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

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

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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

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

**Regulatory Analysis**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Regulation</b>	<b>Condition</b>	<b>Short Description</b>
---			
FACILITY	ECL 19-0301	114	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 60-A.4	37	General provisions - Address
FACILITY	40CFR 60-A.7(b)	38	Notification and Recordkeeping
FACILITY	40CFR 60-A.7(f)	39	Notification and Recordkeeping
FACILITY	40CFR 60-Kb	40	NSPS for volatile

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



**Permit ID: 2-6101-00055/00021**

**Renewal Number: 2**

**07/26/2011**

U- TANKS/00008/003/TK08C	40CFR 60-Kb.112b(a)	110	organic liquid storage vessels- applicability and designation of affected facilities NSPS for volatile organic liquid storage vessels- standard for volatile organic compounds (VOC)
FACILITY	40CFR 60-Kb.113b	41	NSPS for volatile organic liquid storage vessels- testing and procedures
FACILITY	40CFR 60-Kb.113b(a) (2)	42	NSPS for volatile organic liquid storage vessels- testing and procedures
FACILITY	40CFR 60-Kb.113b(a) (4)	43	NSPS for volatile organic liquid storage vessels- testing and procedures
FACILITY	40CFR 60-Kb.113b(a) (5)	44	NSPS for volatile organic liquid storage vessels- testing and procedures
U- TANKS/00008/003/TK08C	40CFR 60-Kb.113b(a) (5)	111	NSPS for volatile organic liquid storage vessels- testing and procedures
U- TANKS/00008/003/TK08C	40CFR 60-Kb.115b(a)	112	NSPS for volatile organic liquid storage vessels- reporting and recordkeeping requirements
FACILITY	40CFR 60-Kb.116b	45	NSPS for volatile organic liquid storage vessels- monitoring of operations
U- TANKS/00008/003/TK08C	40CFR 60-Kb.116b	113	NSPS for volatile organic liquid storage vessels- monitoring of operations
FACILITY	40CFR 60-XX.502 (b)	46	Gasoline terminal loading racks over 20,000 gallons/day - standards for VOC
U-GRACK/GRACK/005	40CFR 60-XX.502 (e)	78	Gasoline terminal loading racks over 20,000 gallons/day - standards for VOC
U- GRACK/GRACK/005/0BVRU	40CFR 60-XX.502 (f)	89	Gasoline terminal loading racks over 20,000 gallons/day - standards for VOC



New York State Department of Environmental Conservation  
Permit Review Report

Permit ID: 2-6101-00055/00021

Renewal Number: 2

07/26/2011

U- GRACK/GRACK/005/0BVRU	40CFR 60-XX.502 (g)	90	Gasoline terminal loading racks over 20,000 gallons/day - standards for VOC
U- GRACK/GRACK/005/0BVRU	40CFR 60-XX.502 (h)	91	Gasoline terminal loading racks over 20,000 gallons/day - standards for VOC
U- GRACK/GRACK/005/0BVRU	40CFR 60-XX.502 (i)	92	Gasoline terminal loading racks over 20,000 gallons/day - standards for VOC
U- GRACK/GRACK/005/0BVRU	40CFR 60-XX.502 (j)	93	Gasoline terminal loading racks over 20,000 gallons/day - standards for VOC
U-GRACK/GRACK/005	40CFR 60-XX.505 (b)	79	Gasoline terminal loading racks over 20,000 gallons/day - reporting and recordkeeping
U- GRACK/GRACK/005/0BVRU	40CFR 60-XX.505 (b)	94	Gasoline terminal loading racks over 20,000 gallons/day - reporting and recordkeeping
U- GRACK/GRACK/005/0BVRU	40CFR 60-XX.505 (c)	95	Gasoline terminal loading racks over 20,000 gallons/day - reporting and recordkeeping
FACILITY	40CFR 60-XX.505 (f)	47	Gasoline terminal loading racks over 20,000 gallons/day - reporting and recordkeeping
FACILITY	40CFR 63-BBBBBB.11089	56	NESHAP for Area Source Gasoline Bulk Terminals - Equipment Leak Inspections
FACILITY	40CFR 63- BBBBBB.11092 (a)	57	NESHAP for Area Source Gasoline Bulk Terminals - Testing and Monitoring Provisions
U- GRACK/GRACK/005/0BVRU	40CFR 63- BBBBBB.11092 (b)	96	NESHAP for Area Source Gasoline Bulk Terminals - Testing and Monitoring Provisions
U- GRACK/GRACK/005/0BVRU	40CFR 63- BBBBBB.11092 (b)	97	NESHAP for Area Source Gasoline Bulk Terminals - Testing and Monitoring Provisions
U- GRACK/GRACK/005/0BVRU	40CFR 63- BBBBBB.11092 (b)	98	NESHAP for Area Source Gasoline Bulk Terminals - Testing and Monitoring Provisions
U- TANKS/00002/003/TK02C	40CFR 63- BBBBBB.11092 (e)	108	NESHAP for Area Source Gasoline Bulk Terminals - Inspections of



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

**Permit ID: 2-6101-00055/00021**

**Renewal Number: 2**

**07/26/2011**

FACILITY	40CFR 63-BBBBBB.11093	58	gasoline storage tanks NESHAP for Area Source Gasoline Bulk Terminals -
U-TANKS	40CFR 63-BBBBBB.11093	102	Notifications NESHAP for Area Source Gasoline Bulk Terminals -
U-TANKS/00002/003/TK02C	40CFR 63-BBBBBB.11094 (a)	109	Recordkeeping Requirements NESHAP for Area Source Gasoline Bulk Terminals -
FACILITY	40CFR 63-BBBBBB.11094 (b)	59	Recordkeeping Requirements NESHAP for Area Source Gasoline Bulk Terminals -
FACILITY	40CFR 63-BBBBBB.11094 (c)	60	Recordkeeping NESHAP for Area Source Gasoline Bulk Terminals -
FACILITY	40CFR 63-BBBBBB.11094 (d)	61	Recordkeeping NESHAP for Area Source Bulk Gasoline Terminals -
FACILITY	40CFR 63-BBBBBB.11094 (e)	62	Recordkeeping NESHAP for Area Source Gasoline Bulk Terminals -
FACILITY	40CFR 63-BBBBBB.11094 (f)	63	Recordkeeping NESHAP for Area Source Gasoline Bulk Terminals -
FACILITY	40CFR 63-BBBBBB.11095 (a)	64	Recordkeeping NESHAP for Area Source Gasoline Bulk Terminals -
FACILITY	40CFR 63-BBBBBB.11095 (b)	65	Reporting NESHAP for Area Source Gasoline Bulk Terminals -
FACILITY	40CFR 63-BBBBBB.11095 (c)	66	Reporting NESHAP for Area Source Gasoline Bulk Terminals -
U-GRACK/GRACK/005/0BVRU	40CFR 63-BBBBBB.11100	99	Applicability Criteria, Emission Limits, and Management Practices for Loading Racks
FACILITY	40CFR 63-R.420 (a)	48, 49, 50, 51, 52, 53	
U-TANKS/-/003	40CFR 63-WW.1063	103	GMACT - NESHAP for Storage Vessels - Control Level 2 - Floating roof requirements
U-TANKS/00002/003/TK02C	40CFR 63-WW.1063	104	GMACT - NESHAP for Storage Vessels - Control Level 2 - Floating roof requirements
U-TANKS/00002/003/TK02C	40CFR 63-WW.1063 (c) (1)	105	Floating roof requirements
FACILITY	40CFR 63-WW.1063 (d)	54	Inspection procedure

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



**Permit ID: 2-6101-00055/00021**  
**Renewal Number: 2**  
**07/26/2011**

U- TANKS/00002/003/TK02C FACILITY	40CFR 63-WW.1065 (a) 40CFR 63-WW.1065 (b)	106 55	requirements Recordkeeping Requirements NESHAP for Storage Vessels - Recordkeeping NESHAP for Storage Vessels - Recordkeeping
U- TANKS/00002/003/TK02C FACILITY	40CFR 63-WW.1065 (c) 40CFR 63-ZZZZ.6625 (e)	107 68	NESHAP for Storage Vessels - Recordkeeping Reciprocating Internal Combustion Engine (RICE) NESHAP - maintenance of engine and control device
FACILITY	40CFR 63- ZZZZ.6640 (f) (1)	69	Reciprocating Internal Combustion Engine (RICE) NESHAP - emergency RICE operation
FACILITY	40CFR 63- ZZZZ.6640 (f) (2)	70	Reciprocating Internal Combustion Engine (RICE) NESHAP - emergency RICE - existing greater than 500 HP at major source of HAP
FACILITY	40CFR 63- ZZZZ.Table (2) (	67	Requirements for Existing Compression Ignition Stationary RICE Located at Area Sources of HAP Emissions
FACILITY	40CFR 64	71	COMPLIANCE ASSURANCE MONITORING
U- GRACK/GRACK/005/0BVRU FACILITY	40CFR 64 40CFR 68	100 20	COMPLIANCE ASSURANCE MONITORING Chemical accident prevention provisions
FACILITY	40CFR 82-F	21	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	115	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2 (a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3 (a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	22, 72, 73	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5 (a) (4)	15	General conditions



New York State Department of Environmental Conservation  
Permit Review Report

Permit ID: 2-6101-00055/00021

Renewal Number: 2

07/26/2011

FACILITY	6NYCRR 201-6.5 (a) (7)	2	General conditions
FACILITY	6NYCRR 201-6.5 (a) (8)	16	Fees
FACILITY	6NYCRR 201-6.5 (c)	3	General conditions
			Permit conditions for
			Recordkeeping and
			Reporting of
FACILITY	6NYCRR 201-6.5 (c) (2)	4	Compliance Monitoring
			Permit conditions for
			Recordkeeping and
			Reporting of
FACILITY	6NYCRR 201- 6.5 (c) (3) (ii)	5	Compliance Monitoring
			Permit conditions for
			Recordkeeping and
			Reporting of
FACILITY	6NYCRR 201-6.5 (d) (5)	17	Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (e)	6	Compliance schedules
			Compliance
FACILITY	6NYCRR 201-6.5 (f) (6)	18	Certification
FACILITY	6NYCRR 201-6.5 (g)	23	Off Permit Changes
FACILITY	6NYCRR 202-1.1	19	Permit shield
			Required emissions
			tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements -
			Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements -
			record keeping
			requirements.
FACILITY	6NYCRR 211.1	24	General Prohibitions
			- air pollution
			prohibited
FACILITY	6NYCRR 211.2	116, 117	General Prohibitions
			- visible emissions
			limited.
FACILITY	6NYCRR 215.2	9	Open Fires -
			Prohibitions
FACILITY	6NYCRR 225.1 (a) (3)	31, 32	Sulfur in Fuel
			Limitations (SIP)
FACILITY	6NYCRR 225-1.2 (a) (2)	118, 119	Sulfur in Fuel
			Limitations Post
			12/31/87.
FACILITY	6NYCRR 225-1.8	25	Reports, sampling and
			analysis.
FACILITY	6NYCRR 225-1.8 (b)	26	Reports, sampling and
			analysis.
U-DRACK/DRACK/006	6NYCRR 225-1.8 (c)	74	Reports, sampling,
			and analysis
FACILITY	6NYCRR 225-1.8 (d)	27	Reports, sampling,
			and analysis
FACILITY	6NYCRR 225-3.3 (a)	28	RVP Limitation - May
			1st through September
			15th
FACILITY	6NYCRR 225-3.4 (a)	29	Gasoline records to
			be maintained
FACILITY	6NYCRR 225-3.4 (b)	30	Records to be
			provided with
			distributed gasoline
FACILITY	6NYCRR 229.3 (a)	33	Petroleum fixed roof
			tank control
			requirements
U-GRACK/GRACK/005	6NYCRR 229.3 (d)	76	Gasoline loading
			terminals
FACILITY	6NYCRR 229.3 (e) (1)	34	Volatile organic
			liquid storage tanks
FACILITY	6NYCRR 229.5	35	Recordkeeping.



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

**Permit ID: 2-6101-00055/00021**

**Renewal Number: 2**

**07/26/2011**

U-TANKS	6NYCRR 229.5 (a)	101	Recordkeeping - petroleum liquid fixed roof storage tanks
FACILITY	6NYCRR 229.5 (c)	36	Recordkeeping - gasoline loading terminals
U-GRACK/GRACK/005	6NYCRR 230.4 (a) (1)	77	Gasoline transport vehicles - prohibitions and requirements.
U-GRACK/GRACK/005/0BVRU	6NYCRR 230.4 (a) (1)	80	Gasoline transport vehicles - prohibitions and requirements.
U-GRACK/GRACK/005/0BVRU	6NYCRR 230.4 (a) (2)	81	Gasoline transport vehicles - prohibitions and requirements.
U-GRACK/GRACK/005/0BVRU	6NYCRR 230.4 (a) (3)	82	Gasoline transport vehicles - prohibitions and requirements.
U-GRACK/GRACK/005/0BVRU	6NYCRR 230.4 (b)	83	Gasoline transport vehicles - prohibitions and requirements.
U-GRACK/GRACK/005/0BVRU	6NYCRR 230.4 (e)	84	Gasoline transport vehicles - prohibitions and requirements.
U-GRACK/GRACK/005/0BVRU	6NYCRR 230.4 (f)	85	Gasoline transport vehicles - prohibitions and requirements.
U-GRACK/GRACK/005/0BVRU	6NYCRR 230.4 (g)	86	Gasoline transport vehicles - prohibitions and requirements.
U-GRACK/GRACK/005/0BVRU	6NYCRR 230.6 (a)	87	Gasoline transport vehicles - recordkeeping and reporting.
U-GRACK	6NYCRR 230.6 (b)	75	Gasoline transport vehicles - recordkeeping and reporting.
U-GRACK/GRACK/005/0BVRU	6NYCRR 230.6 (b)	88	Gasoline transport vehicles - recordkeeping and reporting.

**Applicability Discussion:**

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

ECL 19-0301

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

6 NYCRR 200.6

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



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

**Permit ID: 2-6101-00055/00021**

**Renewal Number: 2**

**07/26/2011**

mitigating measures

6 NYCRR 200.7

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

6 NYCRR 201-1.4

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

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

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

6 NYCRR 201-3.3 (a)

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

6 NYCRR Subpart 201-6

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

6 NYCRR 201-6.5 (a) (4)

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



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

**Permit ID: 2-6101-00055/00021**

**Renewal Number: 2**

**07/26/2011**

6 NYCRR 201-6.5 (a) (7)

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

6 NYCRR 201-6.5 (a) (8)

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

6 NYCRR 201-6.5 (c)

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

6 NYCRR 201-6.5 (c) (2)

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

6 NYCRR 201-6.5 (c) (3) (ii)

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

6 NYCRR 201-6.5 (d) (5)

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

6 NYCRR 201-6.5 (e)

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

6 NYCRR 201-6.5 (f) (6)

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

6 NYCRR 201-6.5 (g)

Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for natural resource damages, etc that are not affected by the federally enforceable portion of the permit, unless they are specifically addressed by it.



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

**Permit ID: 2-6101-00055/00021**

**Renewal Number: 2**

**07/26/2011**

6 NYCRR 202-1.1

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

6 NYCRR 202-2.1

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

6 NYCRR 202-2.5

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

6 NYCRR 211.2

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

6 NYCRR 215.2

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

40 CFR Part 68

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

40 CFR Part 82, Subpart F

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

**Facility Specific Requirements**

In addition to Title V, BP PRODUCTS N AMERICA BROOKLYN TERMINAL has been determined to be subject to the following regulations:

40 CFR 60.112b (a)

This regulation requires that the petroleum liquid storage vessels with fixed roof must have internal floating roofs which meet the design criteria of the section 40 CFR 60-Kb.112b.

40 CFR 60.113b

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

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



**Permit ID: 2-6101-00055/00021**

**Renewal Number: 2**

**07/26/2011**

40 CFR 60.113b (a) (2)

This NSPS regulation for volatile organic liquid storage vessels sets the inspection requirements - testing and procedures for the storage vessels and the internal floating roofs for proper sealing and repairs. This regulation is for the annual inspection of internal floating roofs with liquid-mounted or mechanical shoe primary seal. This regulation, Subpart Kb, is applicable to VOC tanks that began construction on or after July 23, 1984 and greater or equal to 20,000 gallons.

40 CFR 60.113b (a) (4)

This NSPS regulation for volatile organic liquid storage vessels sets the inspection requirements - testing and procedures for the storage vessels and the internal floating roofs for proper sealing and repairs. This regulation, Subpart Kb, is applicable to VOC tanks that began construction on or after July 23, 1984 and greater or equal to 20,000 gallons.

40 CFR 60.113b (a) (5)

40 CFR 60.115b (a)

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

40 CFR 60.116b

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

40 CFR 60.4

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

40 CFR 60.502 (b)

This requirement restricts the emissions of volatile organic compounds (VOC's) from any vapor collection system due to the loading of liquid product into gasoline tank trucks to 35 milligrams of total organic compounds per liter of gasoline loaded or less, except for each affected facility equipped with an existing vapor processing system, as noted in 40 CFR 60.502(c)

40 CFR 60.502 (e)



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

**Permit ID: 2-6101-00055/00021**

**Renewal Number: 2**

**07/26/2011**

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

40 CFR 60.502 (f)

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

40 CFR 60.502 (g)

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

40 CFR 60.502 (h)

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

40 CFR 60.502 (i)

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

40 CFR 60.502 (j)

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

40 CFR 60.505 (b)

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

- (1) Test title: Gasoline Delivery Tank Pressure Test--EPA Reference Method 27.
- (2) Tank owner and address.
- (3) Tank identification number.
- (4) Testing location.
- (5) Date of test.
- (6) Tester name and signature.
- (7) Witnessing inspector, if any: Name, signature, and affiliation.
- (8) Test results: Actual pressure change in 5 minutes, mm of water (average for 2 runs).

40 CFR 60.505 (c)



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

**Permit ID: 2-6101-00055/00021**

**Renewal Number: 2**

**07/26/2011**

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

- (1) Date of inspection.
- (2) Findings (may indicate no leaks discovered; or location, nature, and severity of each leak).
- (3) Leak determination method.
- (4) Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days).
- (5) Inspector name and signature.

40 CFR 60.505 (f)

This regulation requires the owner or operator of an affected facility to keep records of all replacements or additions of components performed on an existing vapor processing system for at least 3 years.

40 CFR 60.7 (b)

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

40 CFR 60.7 (f)

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

40 CFR 63.1063

40 CFR 63.1063 (c) (1)

This regulation sets forth the inspection frequency requirements for tanks with floating roofs.

40 CFR 63.1063 (d)

This regulation sets forth the requirements for inspections of floating internal roof for storage tanks.

40 CFR 63.1065 (a)



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

**Permit ID: 2-6101-00055/00021**

**Renewal Number: 2**

**07/26/2011**

40 CFR 63.1065 (b)

40 CFR 63.1065 (c)

40 CFR 63.11089

40 CFR 63.11092 (a)

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

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

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

40 CFR 63.11092 (e) (1)

40 CFR 63.11093

40 CFR 63.11094 (a)

This regulation is a NESHAP for Area Source Gasoline Bulk Terminals - Recordkeeping Requirements. This regulation specifies the recordkeeping requirements for facilities that are of a bulk gasoline terminal or pipeline breakout station whose storage vessels are subject to the provisions of this subpart shall keep records as specified in 40CFR 60.115b if complying with options 2(a), 2(b), or 2(c) in Table 1 to subpart BBBBBB, except records shall be kept for at least 5 years. If complying with the requirements of option 2(d) in Table 1 to subpart BBBBBB, records shall be kept as specified in 40CFR 63.1065.

New York State Department of Environmental Conservation  
Permit Review Report



Permit ID: 2-6101-00055/00021  
Renewal Number: 2  
07/26/2011

40 CFR 63.11094 (b)

This regulation is a NESHAP for Area Source Gasoline Bulk Terminals - Recordkeeping requirements. This regulation specifies record keeping requirements of the test results for each gasoline cargo tank loading at the facility. The facility shall keep records of the test results for each gasoline cargo tank loading at the facility as specified below:

1) Annual certification testing performed under §63.11092(f)(1) and periodic railcar bubble leak testing performed under §63.11092(f)(2).

2) The documentation file shall be kept up-to-date for each gasoline cargo tank loading at the facility. The documentation for each test shall include, as a minimum, the following information:

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

3) If the facility is complying with the alternative requirements in §63.11088(b), the facility must keep records documenting that the facility has verified the vapor tightness testing according to the requirements of EPA.

40 CFR 63.11094 (c)

This regulation is a NESHAP for Area Source Gasoline Bulk Terminals - Recordkeeping alternative for cargo tank test result. This regulation specifies an alternative to keeping records. As an alternative to keeping records at the terminal of each gasoline cargo tank test result as required in §63.11094(b), the facility may keep an electronic copy of each record which would be instantly available at the terminal. The copy of each record above must be an exact duplicate image of the original paper record with certifying signatures.

For facilities which use a terminal automation system to prevent gasoline cargo tanks that do not have valid cargo tank vapor tightness documentation from loading (e.g., via a card lock-out system), a copy of the documentation must be made available (e.g., via facsimile) for inspection by EPA's or NYSDEC's delegated representatives during the course of a site visit, or within a mutually agreeable time frame.



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

**Permit ID: 2-6101-00055/00021**

**Renewal Number: 2**

**07/26/2011**

40 CFR 63.11094 (d)

This regulation is a NESHAP for Area Source Gasoline Bulk Terminals - Recordkeeping Requirements. Recordkeeping - Equipment Leak Program. This regulation specifies recordkeeping requirements. If the facility is subject to the equipment leak provisions of §63.11089, then the facility shall prepare and maintain a record describing the types, identification numbers, and locations of all equipment in gasoline service. For facilities electing to implement an instrument program under §63.11089, the record shall contain a full description of the program.

40 CFR 63.11094 (e)

This regulation is a NESHAP for Area Source Gasoline Bulk Terminals - Recordkeeping Requirements. This regulation specifies the recordkeeping requirements - Equipment leak log. If the facility is subject to the requirements for equipment leak inspections in §63.11089, then the facility shall record in the log book for each leak that is detected, the information below:

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

40 CFR 63.11094 (f)

40 CFR 63.11095 (a)

40 CFR 63.11095 (b)

40 CFR 63.11095 (c)



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

**Permit ID: 2-6101-00055/00021**

**Renewal Number: 2**

**07/26/2011**

40 CFR 63.11100

This regulation requires the owner/operator of gasoline loading racks to collect vapors generated during the loading of gasoline and to limit emissions of total organic carbon, during these loading operations to 80 milligrams per liter or less.

40 CFR 63.420 (a)

40 CFR 63.6625 (e)

This regulation requires the owners or operator of an existing stationary RICE with a site rating of less than 100 brake HP located at a major source of HAP emissions, an existing stationary emergency RICE, or an existing stationary RICE located at an area source of HAP emissions must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

40 CFR 63.6640 (f) (1)

This regulation sets forth the compliance provisions for the operation of reciprocating internal combustion engines in emergency situations.

40 CFR 63.6640 (f) (2)

This regulation sets forth the compliance provisions for the operation of reciprocating internal combustion engines installed prior to June 12, 2006 with a site rating greater than 500 brake horsepower located at a major source of HAP emissions in emergency situations.

40 CFR 63.Table (2) (d)

40 CFR Part 60, Subpart Kb



New York State Department of Environmental Conservation  
Permit Review Report

Permit ID: 2-6101-00055/00021

Renewal Number: 2

07/26/2011

40 CFR Part 64

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

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

6 NYCRR 211.1

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

6 NYCRR 225.1 (a) (3)

This regulation limits the amount of sulfur that can be in fuel burned at a stationary source. It references Table 1 of the 1979 version of the sulfur in fuel limitations expressed in terms of percent by weight for fuel oil and pounds per million Btu gross heat content for solid fuel. **NOTE: This citation has been replaced by requirements cited under 225-1.2(a)(2) and is no longer part of current State regulations, however, it remains part of New York State's approved State Implementation Plan (SIP).**

6 NYCRR 225-1.2 (a) (2)

This regulation prohibits any person from selling, offering for sale, purchasing or using any fuel which contains sulfur in a quantity exceeding the limitations set forth in Table 1, Table 2, or Table 3 of this section.

6 NYCRR 225-1.8

This regulation requires an owner or operator of a facility which purchases and fires coal and/or oil to 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.

6 NYCRR 225-1.8 (b)

Upon request the owner or operator of a facility which purchases and fires coal or oil shall submit



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

**Permit ID: 2-6101-00055/00021**

**Renewal Number: 2**

**07/26/2011**

reports to the commissioner containing a fuel analysis, 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

6 NYCRR 225-1.8 (c)

This regulation requires the owner or operator of a source subject to 6 NYCRR Part 225-1 to maintain and retain monitoring records and make them available for inspectors during regular business hours.

6 NYCRR 225-1.8 (d)

This requires that sampling, compositing and analysis of fuel samples must be done in accordance with methods acceptable to the commissioner.

6 NYCRR 225-3.3 (a)

This regulation prohibits the sale of any gasoline to a retailer or wholesale purchaser-consumer, which has a Reid vapor pressure greater than 9.0 pounds per square inch (psi) as sampled and tested by methods acceptable to the commissioner, during the period May 1st through September 15th of each year beginning 1989.

6 NYCRR 225-3.4 (a)

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

6 NYCRR 225-3.4 (b)

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

6 NYCRR 229.3 (a)

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

6 NYCRR 229.3 (d)

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

6 NYCRR 229.3 (e) (1)

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

New York State Department of Environmental Conservation  
Permit Review Report



Permit ID: 2-6101-00055/00021

Renewal Number: 2

07/26/2011

6 NYCRR 229.5

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

6 NYCRR 229.5 (a)

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

6 NYCRR 229.5 (c)

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

6 NYCRR 230.4 (a) (1)

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

6 NYCRR 230.4 (a) (2)

Gasoline transport vehicles that fail the ability to sustain the specified pressure change in 230.4(a)(1) must be repaired within 15 days.

6 NYCRR 230.4 (a) (3)

The gasoline transport vehicle must display "NYSDEC" and the date of passing pressure-vacuum test using 2" letters/numbers and located near the US DOT certificate plate.

6 NYCRR 230.4 (b)

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

6 NYCRR 230.4 (e)

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

6 NYCRR 230.4 (f)

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



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

**Permit ID: 2-6101-00055/00021**

**Renewal Number: 2**

**07/26/2011**

6 NYCRR 230.4 (g)

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

6 NYCRR 230.6 (a)

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

6 NYCRR 230.6 (b)

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

**Non Applicability Analysis**

**List of non-applicable rules and regulations:**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Regulation</b>	<b>Short Description</b>
FACILITY	6 NYCRR Subpart 231-2	New Source Review in Nonattainment Areas and Ozone Transport Region

**Reason: Non-Attainment NSR Applicability:**

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 of VOC (the significant project threshold for severe non-attainment areas).

The BP Brooklyn Terminal is currently an existing major facility for VOC. For existing emission sources at a major facility, the PEP is calculated as the difference between the baseline actual emissions and the projected actual emissions of the 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.

**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



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

**Permit ID: 2-6101-00055/00021**

**Renewal Number: 2**

**07/26/2011**

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 - 10.0 = 2.20 TPY 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.

NOTE: Non-applicability determinations are cited as a permit condition under 6 NYCRR Part 201-6.5(g). This information is optional and provided only if the applicant is seeking to obtain formal confirmation, within an issued Title V permit, that specified activities are not subject to the listed federal applicable or state only requirement. The applicant is seeking to obtain verification that a requirement does not apply for the stated reason(s) and the Department has agreed to include the non-applicability determination in the issued Title V permit which in turn provides a shield against any potential enforcement action.

**Compliance Certification**

**Summary of monitoring activities at BP PRODUCTS N AMERICA BROOKLYN TERMINAL:**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Cond No.</b>	<b>Type of Monitoring</b>
---		
FACILITY	40	record keeping/maintenance procedures
FACILITY	41	record keeping/maintenance procedures
FACILITY	42	record keeping/maintenance procedures
FACILITY	43	record keeping/maintenance procedures
FACILITY	44	record keeping/maintenance procedures
U-TANKS/00008/003/TK08C	111	record keeping/maintenance procedures
U-TANKS/00008/003/TK08C	112	record keeping/maintenance procedures
FACILITY	45	record keeping/maintenance procedures
U-TANKS/00008/003/TK08C	113	record keeping/maintenance procedures
FACILITY	46	ambient air monitoring
U-GRACK/GRACK/005	78	record keeping/maintenance procedures
U-GRACK/GRACK/005/0BVRU	91	monitoring of process or control device parameters as surrogate
U-GRACK/GRACK/005/0BVRU	93	record keeping/maintenance procedures
U-GRACK/GRACK/005	79	record keeping/maintenance procedures
U-GRACK/GRACK/005/0BVRU	94	record keeping/maintenance procedures
U-GRACK/GRACK/005/0BVRU	95	record keeping/maintenance procedures
FACILITY	47	record keeping/maintenance procedures



New York State Department of Environmental Conservation  
Permit Review Report

Permit ID: 2-6101-00055/00021

Renewal Number: 2

07/26/2011

FACILITY	56	record keeping/maintenance procedures
FACILITY	57	continuous emission monitoring (cem)
U-GRACK/GRACK/005/0BVRU	96	continuous emission monitoring (cem)
U-GRACK/GRACK/005/0BVRU	97	record keeping/maintenance procedures
U-GRACK/GRACK/005/0BVRU	98	record keeping/maintenance procedures
U-TANKS/00002/003/TK02C	109	record keeping/maintenance procedures
FACILITY	59	record keeping/maintenance procedures
FACILITY	60	record keeping/maintenance procedures
FACILITY	61	record keeping/maintenance procedures
FACILITY	62	record keeping/maintenance procedures
FACILITY	63	record keeping/maintenance procedures
FACILITY	64	record keeping/maintenance procedures
FACILITY	65	record keeping/maintenance procedures
U-GRACK/GRACK/005/0BVRU	99	intermittent emission testing
FACILITY	48	work practice involving specific operations
FACILITY	49	work practice involving specific operations
FACILITY	50	work practice involving specific operations
FACILITY	51	work practice involving specific operations
FACILITY	52	work practice involving specific operations
FACILITY	53	record keeping/maintenance procedures
U-TANKS/00002/003/TK02C	105	record keeping/maintenance procedures
FACILITY	54	record keeping/maintenance procedures
U-TANKS/00002/003/TK02C	106	record keeping/maintenance procedures
FACILITY	55	record keeping/maintenance procedures
U-TANKS/00002/003/TK02C	107	record keeping/maintenance procedures
FACILITY	68	record keeping/maintenance procedures
FACILITY	69	record keeping/maintenance procedures
FACILITY	70	record keeping/maintenance procedures
FACILITY	67	record keeping/maintenance procedures
FACILITY	71	monitoring of process or control device parameters as surrogate
U-GRACK/GRACK/005/0BVRU	100	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
FACILITY	117	record keeping/maintenance procedures
FACILITY	31	work practice involving specific operations
FACILITY	32	work practice involving specific operations
FACILITY	118	work practice involving specific operations
FACILITY	119	work practice involving specific operations
FACILITY	25	record keeping/maintenance procedures
FACILITY	26	record keeping/maintenance procedures
U-DRACK/DRACK/006	74	record keeping/maintenance procedures
FACILITY	28	work practice involving specific operations
FACILITY	29	record keeping/maintenance procedures
FACILITY	30	record keeping/maintenance procedures
FACILITY	33	record keeping/maintenance procedures
U-GRACK/GRACK/005	76	intermittent emission testing
FACILITY	34	record keeping/maintenance procedures
FACILITY	35	record keeping/maintenance procedures
U-TANKS	101	record keeping/maintenance procedures
FACILITY	36	record keeping/maintenance procedures
U-GRACK/GRACK/005	77	monitoring of process or control device parameters as surrogate
U-GRACK/GRACK/005/0BVRU	80	monitoring of process or control device parameters as surrogate
U-GRACK/GRACK/005/0BVRU	83	intermittent emission testing
U-GRACK/GRACK/005/0BVRU	85	monitoring of process or control device parameters as surrogate
U-GRACK/GRACK/005/0BVRU	87	record keeping/maintenance procedures
U-GRACK	75	record keeping/maintenance procedures
U-GRACK/GRACK/005/0BVRU	88	record keeping/maintenance procedures

-----  
----



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

**Permit ID: 2-6101-00055/00021**

**Renewal Number: 2**

**07/26/2011**

**Basis for Monitoring**

This facility is subject to the requirements of Title V. The facility is required, under the provisions of 6 NYCRR Subpart 201-6, to submit semiannual compliance reports and an annual Compliance Certification. In addition to record keeping requirements, this facility has to comply with the following monitoring conditions:

**Condition #28 for 6 NYCRR 225-3.3(a):** This is a facility-wide condition. This condition is for Work Practice Involving Specific Operations for the Reid Vapor Pressure. The upper limit is 9.0 pounds per square inch absolute.

This condition prohibits the sale of any gasoline to a retailer or wholesale purchaser-consumer, which has a Reid vapor pressure (RVP) greater than 9.0 pounds per square inch (psi) as sampled and tested by methods acceptable to the commissioner, during the period May 1st through September 15th 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 years from the date of delivery.

**Condition #31 for 6 NYCRR 225.1 (a) (3):** This is a facility-wide condition. This condition is for Work Practice Involving Specific Operations for sulfur content. This condition limits the amount of sulfur that can be in fuel burned at a stationary source. It references Table 1 of the 1979 version of the sulfur in fuel limitations expressed in terms of percent by weight for fuel oil and pounds per million Btu gross heat content for solid fuel. The sulfur limit is 0.20 percent by weight for distillates - number 1 and number 2 fuel oil for the New York City area. NOTE: This citation has been replaced by requirements cited under 225-1.2(a)(2) and is no longer part of current State regulations, however, it remains part of New York State's approved State Implementation Plan (SIP).

The intent of 6 NYCRR 225.1(a)(3) is to prohibit within a certain region the combustion of fuels with sulfur contents exceeding certain levels. BP Products North America Inc. (BP) Brooklyn Terminal is located within the New York City area which has sulfur content limit of 0.30 percent by weight for residual fuel and 0.20 percent by weight for distillates. However, BP markets and sells fuels outside of the New York City area. These areas have different fuel sulfur content standards specified in 6 NYCRR 225-1.2, Tables 1, 2 and 3. Thus, for reasons of commerce, BP will comply with a specified fuel sulfur limits as appropriate for the area where the product is being distributed.

**Condition #32 for 6 NYCRR 225.1 (a) (3):** This is a facility-wide condition. This condition is for Work Practice Involving Specific Operations for sulfur content. This condition limits the amount of sulfur that can be in fuel burned at a stationary source. It references Table 1 of the 1979 version of the sulfur in fuel limitations expressed in terms of percent by weight for fuel oil and pounds per million Btu gross heat content for solid fuel. The sulfur limit is 0.30 percent by weight for residual fuel oil - number 4, number 5 and/or number 6 for the New York City area. NOTE: This citation has been replaced by requirements cited under 225-1.2(a)(2) and is no longer part of current State regulations, however, it remains part of New York State's approved State Implementation Plan (SIP).



New York State Department of Environmental Conservation  
Permit Review Report

Permit ID: 2-6101-00055/00021

Renewal Number: 2

07/26/2011

The intent of 6 NYCRR 225.1(a)(3) is to prohibit within a certain region the combustion of fuels with sulfur contents exceeding certain levels. BP Products North America Inc. (BP) Brooklyn Terminal is located within the New York City area which has sulfur content limit of 0.30 percent by weight for residual fuel and 0.20 percent by weight for distillates. However, BP markets and sells fuels outside of the New York City area. These areas have different fuel sulfur content standards specified in 6 NYCRR 225-1.2, Tables 1, 2 and 3. Thus, for reasons of commerce, BP will comply with a specified fuel sulfur limits as appropriate for the area where the product is being distributed.

**Condition #46 for 40 CFR 60.502(b), NSPS Subpart XX:** This is a facility-wide condition. This condition is for Ambient Air Monitoring for VOC. This requirement restricts the emissions of volatile organic compounds (VOC's) from any vapor collection system due to the loading of liquid product into gasoline tank trucks to 35 milligrams of total organic compounds per liter of gasoline loaded or less, except for each affected facility equipped with an existing vapor processing system, as noted in 40 CFR 60. 502(c).

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 upper limit of 10 mg/l. A performance test was conducted on April 24, 2002 and tested 0.89 mg/l. The facility is required to conduct another performance test within 5 years of the April 24, 2002 date.

The gasoline vapor collection and control systems must capture gasoline vapors during loading and unloading of gasoline transport vehicles and must condense, absorb, adsorb, or combust gasoline vapors so emissions do not exceed 10 milligrams per liter of gasoline loaded.

**Condition #48 for 6 NYCRR 40 CFR 63.420 (a), Subpart R:** This is a facility-wide condition. This condition is for Working Practice Involving Specific operations for Xylene, M, O & P MIXT. The total HAPs annual limit is 25 tons per year and each individual HAP's annual limit such as Xylene, M, O & P MIXT. is 10 tons per year. A facility can remain below the applicability criteria of the Gasoline Distribution MACT (40 CFR 63 subpart R) by limiting its annual gasoline throughput per year on a twelve month rolling average basis to a level as to maintain an "area source" status for 40 CFR 63 subpart R.

The facility is limiting the gasoline annual throughput to 600,000,000 gallons and hence avoiding compliance with 40CFR 63R. By limiting the gasoline annual throughput, the facility is also limiting any annual 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 month rolling average basis. This will ensure that the emissions screening factors for bulk gasoline is less than 1.0. Records of annual gasoline throughput and 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 NYSDEC - Region 2 office by January 30 of each year.

**Condition #49 for 6 NYCRR 40 CFR 63.420 (a), Subpart R:** This is a facility-wide condition. This condition is for Working Practice Involving Specific operations for Benzene. The total HAPs annual limit is 25 tons per year and each individual HAP's annual limit such as Benzene is 10 tons per year. A facility can remain below the applicability criteria of the Gasoline Distribution MACT



New York State Department of Environmental Conservation  
Permit Review Report

Permit ID: 2-6101-00055/00021

Renewal Number: 2

07/26/2011

(40 CFR 63 subpart R) by limiting its annual gasoline throughput per year on a twelve month rolling average basis to a level as to maintain an "area source" status for 40 CFR 63 subpart R.

The facility is limiting the gasoline annual throughput to 600,000,000 gallons and hence avoiding compliance with 40CFR 63R. By limiting the gasoline annual throughput, the facility is also limiting any annual 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 month rolling average basis. This will ensure that the emissions screening factors for bulk gasoline is less than 1.0. Records of annual gasoline throughput and 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 NYSDEC - Region 2 office by January 30 of each year.

**Condition #50 for 6 NYCRR 40 CFR 63.420 (a), Subpart R:** This is a facility-wide condition. This condition is for Working Practice Involving Specific operations for HAP. The total HAPs annual limit is 25 tons per year and each individual HAP's annual limit is 10 tons per year. A facility can remain below the applicability criteria of the Gasoline Distribution MACT (40 CFR 63 subpart R) by limiting its annual gasoline throughput per year on a twelve month rolling average basis to a level as to maintain an "area source" status for 40 CFR 63 subpart R.

The facility is limiting the gasoline annual throughput to 600,000,000 gallons and hence avoiding compliance with 40CFR 63R. By limiting the gasoline annual throughput, the facility is also limiting any annual 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 month rolling average basis. This will ensure that the emissions screening factors for bulk gasoline is less than 1.0. Records of annual gasoline throughput and 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 NYSDEC - Region 2 office by January 30 of each year.

**Condition #51 for 6 NYCRR 40 CFR 63.420 (a), Subpart R:** This is a facility-wide condition. This condition is for Working Practice Involving Specific operations for Toluene. The total HAPs annual limit is 25 tons per year and each individual HAP's annual limit such as Toluene is 10 tons per year. A facility can remain below the applicability criteria of the Gasoline Distribution MACT (40 CFR 63 subpart R) by limiting its annual gasoline throughput per year on a twelve month rolling average basis to a level as to maintain an "area source" status for 40 CFR 63 subpart R.

The facility is limiting the gasoline annual throughput to 600,000,000 gallons and hence avoiding compliance with 40CFR 63R. By limiting the gasoline annual throughput, the facility is also limiting any annual 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 month rolling average basis. This will ensure that the emissions screening factors for bulk gasoline is less than 1.0.



New York State Department of Environmental Conservation  
Permit Review Report

Permit ID: 2-6101-00055/00021

Renewal Number: 2

07/26/2011

Records of annual gasoline throughput and 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 NYSDEC - Region 2 office by January 30 of each year.

**Condition #52 for 6 NYCRR 40 CFR 63.420 (a), Subpart R:** This is a facility-wide condition. This condition is for Working Practice Involving Specific operations for Hexane. The total HAPs annual limit is 25 tons per year and each individual HAP's annual limit such as Hexane is 10 tons per year. A facility can remain below the applicability criteria of the Gasoline Distribution MACT (40 CFR 63 subpart R) by limiting its annual gasoline throughput per year on a twelve month rolling average basis to a level as to maintain an "area source" status for 40 CFR 63 subpart R.

The facility is limiting the gasoline annual throughput to 600,000,000 gallons and hence avoiding compliance with 40CFR 63R. By limiting the gasoline annual throughput, the facility is also limiting any annual 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 month rolling average basis. This will ensure that the emissions screening factors for bulk gasoline is less than 1.0. Records of annual gasoline throughput and 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 NYSDEC - Region 2 office by January 30 of each year.

**Condition #57 for 6 NYCRR 40 CFR 63.11092(a), Subpart BBBBBB:** This condition is an emission unit level, emission point level, process level and emission source/control level condition that applies to Emission Unit; U-GRACK, Emission Point: GRACK, Process 005: and Emission Source/Control: 0BVRU & 0PVRU for Continuous Emission Monitoring (CEM) for VOC for an upper limit of 80 milligrams of VOC per liter of gasoline.

This condition requires the owner and/or operator of a facility that is subject to the emission standard in §63.11088 for gasoline loading racks to conduct a performance test on the vapor processing and collection systems according to either of the following methods;

- test methods and procedures in §60.503, except a reading of 500ppm shall be used to determine the level of leaks to be repaired under §60.503(b), or;

- alternative test methods and procedures in accordance with the alternative test method requirements in §63.7(f).

In lieu of conducting a performance test on the vapor processing and collection systems once during the term of this permit, the facility has chosen Continuous Emission Monitoring (CEM) to demonstrate compliance with the 80 milligrams per liter VOC limit for the vapor recovery units (Emission Sources/Controls 0BVRU and 0PVRU).

**Condition #71 for 40 CFR Part 64:** This is a facility-wide condition for Monitoring of Process or Control Device Parameters as Surrogate for VOC. The VOC emissions limit is 10 milligrams per liter from the transport tanker truck loading operation.



New York State Department of Environmental Conservation  
Permit Review Report

Permit ID: 2-6101-00055/00021

Renewal Number: 2

07/26/2011

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

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.

BP plans to monitor its 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.

**Condition #76 for 6 NYCRR 229.3 (d):** This condition is an emission unit level, emission point level and process level condition that applies to Emission Unit: U-GRACK, Emission Point: GRACK and Process: 005 for Intermittent Emission Testing for VOC with an upper limit of 10 milligrams of VOC per liter of gasoline.

This condition contains the VOC emission limit of 10 milligrams per liter of gasoline loaded and operating requirements for gasoline loading terminals (i.e. those facilities with an average daily throughput of gasoline greater than 20,000 gallons).

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

**Condition #77 for 6 NYCRR 230.4 (a) (1):** This is an emission unit level, emission point and process level condition that applies to EU: GRACK, GRACK and Proc: 005. This condition is for Monitoring of Process or Control Device Parameters as Surrogate for the Pressure Change of 3.0 inches of water as an upper limit.

This condition sets the monitoring requirements and prohibitions for gasoline transport vehicles. This condition prohibits the vehicle to be filled or emptied unless the gasoline transport vehicle sustains a pressure change of not more than three inches of water in five minutes when pressurized to a gauge pressure of 18 inches of water and evacuated to a gauge pressure of six inches of water.

**Condition #80 for 6 NYCRR 230.4 (a) (1):** This is an emission unit level, emission point level, process level and emission sources/control level condition that applies to EU: GRACK, Emission Point: GRACK, Proc: 005 and Emission Source/Control: 0BVRU & 0PVRU. This condition is for Monitoring of Process or Control Device Parameters as Surrogate for the Pressure Change of 3.0 inches of water as an upper limit.

This condition sets the monitoring requirements and prohibitions for gasoline transport vehicles. This condition prohibits the vehicle to be filled or emptied unless the gasoline transport vehicle sustains a pressure change of not more than three inches of water in five minutes when pressurized to a gauge pressure of 18 inches of water and evacuated to a gauge pressure of six inches of water.



New York State Department of Environmental Conservation  
Permit Review Report

Permit ID: 2-6101-00055/00021

Renewal Number: 2

07/26/2011

**Condition #83 for 6 NYCRR 230.4 (b):** This is an emission unit level, emission point level, process level and emission source/control level condition that applies to EU: U-GRACK, EP: GRACK, Proc: 005 and ES/C: 0BVRU & 0PVRU. This condition is for Intermittent Emission Testing for the Pressure Change of 3.0 inches of water as an upper limit.

This condition sets the monitoring requirements and prohibitions for gasoline transport vehicles. This condition sets the annual gasoline transport vehicle testing requirements for gasoline transport vehicles. 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.

**Condition #85 for 6 NYCRR 230.4 (f):** This is an emission unit level, emission point level, process level and emission source/control level condition that applies to EU: U-GRACK, EP: GRACK, Proc: 005 and ES/C: 0BVRU & 0PVRU. This condition is for Monitoring of Process or Control Device Parameters as Surrogate for Pressure. This condition sets the monitoring requirements and prohibitions for gasoline transport vehicles. This condition is a monitoring requirement for loading pressure for gasoline transport vehicles. This condition prohibits a compartment on said vehicle to be loaded under a pressure exceeding 18 inches of water gauge, to be unloaded under a vacuum exceeding 6.0 inches of water gauge, or to be unloaded under pressure.

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

**Condition #91 for 40 CFR 60.502(h), NSPS Subpart XX:** This condition is an emission unit level, emission point level, process level and emission source/control level condition that applies to Emission Unit: U-GRACK, Emission Point: GRACK, Process: 005 and Emission Source/Control 0BVRU & 0PVRU for Monitoring of Process or Control Device Parameters as Surrogate for Pressure with an upper limit of 450 millimeters of water.

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

**Condition #96 for 40 CFR 63.11092(b)(1)(i)('A'), Subpart BBBBBB:** This condition is an emission unit level, emission point level, process level and emission source/control level condition that applies to Emission Unit: U-GRACK, Emission Point: GRACK, Process: 005 and Emission Source/Control: 0BVRU & 0PVRU for Continuous Emission Monitoring (CEM) for VOC for an upper limit of 80 milligrams of VOC per liter of gasoline.

This is a NESHAP for area source gasoline bulk terminals for testing and monitoring provisions. This condition is a CEM monitoring requirement for carbon adsorption system.

For each performance test conducted under §63.11092(a)(1), the facility shall determine a monitored operating parameter value for the vapor processing system.

The facility shall install, calibrate, certify, operate, and maintain, according to the manufacturer's specifications, a continuous emissions monitoring system (CEMS) while gasoline vapors are displaced to the carbon adsorption system. During the performance test, the facility shall continuously record the



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

**Permit ID: 2-6101-00055/00021**

**Renewal Number: 2**

**07/26/2011**

organic compound concentration of the exhaust stream to ensure that the emission limit in §63.11088(a) is being met.

**Condition #99 for 40 CFR 63.11100, Subpart BBBBBB:** This condition is an emission unit level, emission point level, process level and emission source/control level condition that applies to Emission Unit: U-GRACK, Emission Point: GRACK, Process: 005 and Emission Source/Control: 0BVRU & 0PVRU for Intermittent Emission Testing for an upper limit of 80 milligrams of VOC per liter of gasoline.

This condition requires the owner/operator of gasoline loading racks to collect vapors generated during the loading of gasoline and to limit emissions of total organic carbon, during these loading operations to 80 milligrams per liter or less.

**Condition #118 for 6 NYCRR 225-1.2 (a) (2):** This is a facility-wide condition for Work Practice Involving Specific Operations for sulfur content in residual fuel. The sulfur content upper limit is 0.30 percent by weight for residual fuel oil.

This condition prohibits any person from selling, offering for sale, purchasing or using any fuel which contains sulfur in a quantity exceeding the limitations set forth in Table 1, Table 2, or Table 3 of this section.

**Condition #119 for 6 NYCRR 225-1.2 (a) (2):** This is a facility-wide condition for Work Practice Involving Specific Operations for sulfur content in residual fuel. The sulfur content upper limit is 0.20 percent by weight for distillate fuel oil.

This condition prohibits any person from selling, offering for sale, purchasing or using any fuel which contains sulfur in a quantity exceeding the limitations set forth in Table 1, Table 2, or Table 3 of this section.