New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-3814-00003/00014
Renewal Number: 2
03/02/2015

Facility Identification Data
Name: PETROLEUM FUEL & TERMINAL CO-RENSSELAER
Address: 54 RIVERSIDE AVE
RENSSELAER, NY 12144

Owner/Firm
Name: CENEX RENSSELAER TERMINAL LLC
Address: 8235 FORSYTH BLVD STE 400
SAINT LOUIS, MO 63105, USA
Owner Classification: Corporation/Partnership

Permit Contacts
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Permit Description

Introduction

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

Summary Description of Proposed Project
Application for renewal of Air Title V Facility.

Attainment Status
PETROLEUM FUEL & TERMINAL CO-RENSSELAER is located in the town of RENSSELAER in the

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

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

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.
** NOx has a separate ambient air quality standard in addition to being an ozone precursor.

Facility Description:
Petroleum Bulk Storage terminal with truck and marine loading docks.

Permit Structure and Description of Operations
The Title V permit for PETROLEUM FUEL & TERMINAL CO-RENSSELAER
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.

PETROLEUM FUEL & TERMINAL CO-RENSSELAER is defined by the following emission unit(s):

Emission unit 1TANKS - An aboveground storage tank designated as tank 20-9 equipped with an internal floating roof. Storage capacity is 20,000 barrels (480,000 gallons) storage petroleum liquid and/or volatile organic liquids.

Emission unit 1TANKS is associated with the following emission points (EP):
00003, 00004, 00005, 00006, 00007, 00010, 00011, 00012
Process: FG1 is located at TANK FARM - MISCELLANEOUS FUGITIVE HAP AND VOC EMISSIONS FROM VALVE, PUMP AND FLANGE LEAKAGE. ALL EMISSIONS ARE AT INSIGNIFICANT LEVELS.

Process: GAS is located at TANK FARM - EIGHT STORAGE TANKS, EACH HAVE A CAPACITY WHICH EXEEDS 40,000 GALLONS. EACH HAS A FIXED ROOF WITH AN INTERNAL FLOATING ROOF SEALING SYSTEM.

Emission unit 1RACKS - There are three loading racks at the facility: 1) Bottom loading rack for gasoline loading into trucks, connected to vapor combustion unit 2) Top loading rack for fuel oil/ kerosene loading into trucks. 3) Barge laoding rack used to load fuel oil onto barges.

Emission unit 1RACKS is associated with the following emission points (EP):
00009
Process: RBL is located at LOADING AREA - GASOLINE TANK TRUCKS ARE BOTTOM LOADED. VAPORS ARE BURNED OFF THROUGH A FLARE.

Process: RDL is located at DOCK LOADING AREA - BARGES ARE LOADED AT DOCK LOADING AREA WITH FUEL OIL.

Process: RTL is located at LOADING AREA - TANK TRUCKS ARE TOP LOADED WITH EITHER FUEL OIL OR KEROSENE.

Title V/Major Source Status
PETROLEUM FUEL & TERMINAL CO-RENSSELAER is subject to Title V requirements. This determination is based on the following information:
The facility is major for Volatile Organic Compounds (VOC). The facility emits over 50 tons of VOC therefore the facility is major.

Program Applicability
The following chart summarizes the applicability of PETROLEUM FUEL & TERMINAL CO-RENSSELAER with regards to the principal air pollution
regulatory programs:

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

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 (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
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
4-04-001-10	BULK TERMINALS/PLANTS BULK TERMINALS GASOLINE RVP 13: STANDING LOSS (67000 BBL.CAPACITY) FLOATING ROOF TANK
4-04-002-51	BULK TERMINALS/PLANTS BULK PLANTS Valves, Flanges, and Pumps
4-06-001-31	TRANSPORTATION AND MARKETING OF PETROLEUM PRODUCTS TANK CARS AND TRUCKS GASOLINE: SUBMERGED LOADING (NORMAL SERVICE)
4-06-002-40	TRANSPORTATION AND MARKETING OF PETROLEUM PRODUCTS TRANSPORTATION AND MARKETING OF PETROLEUM PRODUCTS - MARINE VESSELS Gasoline: Barge Loading - Average Tank Condition

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 CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE lbs/yr	PTE Range
000071-43-2	BENZENE	19000	
000098-82-8	BENZENE, (1-METHYLETHYL)	19000	
000630-08-0	CARBON MONOXIDE		> 0 but < 2.5 tpy
000100-41-4	ETHYLBENZENE	19000	
000110-54-3	HEXANE	19000	
001634-04-4	METHYL TERTBUTYL ETHER		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN		> 0 but < 2.5 tpy
0NY075-00-0	PARTICULATES		> 0 but < 2.5 tpy
0NY075-00-5	PM-10		> 0 but < 2.5 tpy
007446-09-5	SULFUR DIOXIDE		> 0 but < 2.5 tpy
000108-88-3	TOLUENE	19000	
0NY100-00-0	TOTAL HAP	47500	
0NY998-00-0	VOC		>= 100 tpy but < 250 tpy
001330-20-7	XYLENE, M, O & P MIXT.	19000	

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)

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 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 2 01-6.7 and Part 621.

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

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

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

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

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

Item L: Permit Exclusion - ECL 19-0305

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

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

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

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

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
FACILITY	ECL 19-0301	74	Powers and Duties of the Department with respect to air pollution control
FACILITY	ECL 19-0301.(3)(b)	75	Prohibition of the use of methyl tertiary butyl ether (MTBE) as a motor fuel oxygenate
FACILITY	40CFR 63-BBBBBB.11081(a	41	Definition of affected source
FACILITY	40CFR 63-BBBBBB.11083(b	42	Compliance date for an existing affected source
1-TANKS/-/GAS	40CFR 63-BBBBBB.11087	72	NESHAP for Area Source Gasoline Bulk Terminals - Requirements for Tanks
1-RACKS/-/RBL	40CFR 63-BBBBBB.11088	59	NESHAP for Area Source Bulk Gasoline Terminals - Requirements for Loading Racks
1-TANKS/-/GAS	40CFR 63-BBBBBB.11089	73	NESHAP for Area Source Gasoline Bulk Terminals - Equipment Leak Inspections
1-RACKS/-/RBL	40CFR 63-BBBBBB.11092(a	60	NESHAP for Area Source Gasoline Bulk Terminals - Testing and Monitoring Provisions
1-RACKS/-/RBL	40CFR 63-BBBBBB.11092(a	61	Testing and monitoring provisions - gasoline loading racks
1-RACKS/-/RBL	40CFR 63-BBBBBB.11092(a	62	Testing and monitoring requirements - Gasoline loading racks
1-RACKS/-/RBL	40CFR 63-BBBBBB.11092(b	63	NESHAP for Area Source Gasoline Bulk Terminals - Testing and Monitoring Provisions
1-RACKS/-/RBL	40CFR 63-BBBBBB.11094(b	64	NESHAP for Area Source Gasoline Bulk Terminals - Recordkeeping
1-RACKS/-/RBL	40CFR 63-	65	NESHAP for Area

	BBBBBB.11094(c		Source Gasoline Bulk Terminals - Recordkeeping
1-RACKS/-/RBL	40CFR 63-BBBBBB.11094(d	66	NESHAP for Area Source Bulk Gasoline Terminals - Recordkeeping
1-RACKS/-/RBL	40CFR 63-BBBBBB.11094(e	67	NESHAP for Area Source Gasoline Bulk Terminals - Recordkeeping
1-RACKS/-/RBL	40CFR 63-BBBBBB.11094(f	68	NESHAP for Area Source Gasoline Bulk Terminals - Recordkeeping
FACILITY	40CFR 63-BBBBBB.11095(a	43	NESHAP for Area Source Gasoline Bulk Terminals - Reporting
1-RACKS/-/RBL	40CFR 63-BBBBBB.11095(b	69	NESHAP for Area Source Gasoline Bulk Terminals - Reporting
FACILITY	40CFR 63-BBBBBB.11098	44	NESHAP for Area Source Gasoline Bulk Terminals - General Provisions
FACILITY	40CFR 63-R	26, 27, 28, 29, 30	Subpart R- Gasoline Distribution Facility NESHAP
1-RACKS	40CFR 64	57, 58	COMPLIANCE ASSURANCE MONITORING
FACILITY	40CFR 68	21	Chemical accident prevention provisions
FACILITY	40CFR 82-F	22	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	76	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	23, 45, 46	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5(a)(4)	15	General conditions
FACILITY	6NYCRR 201-6.5(a)(7)	2	General conditions Fees
FACILITY	6NYCRR 201-6.5(a)(8)	16	General conditions
FACILITY	6NYCRR 201-6.5(c)	3	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring

FACILITY	6NYCRR 201-6.5(c)(2)	4	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(3)(ii	5	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(d)(5)	17	Compliance schedules
FACILITY	6NYCRR 201-6.5(e)	24	Compliance Certification
FACILITY	6NYCRR 201-6.5(f)(6)	18	Off Permit Changes
FACILITY	6NYCRR 201-7	25, 26, 27, 28, 29, 30, 47	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-1.1	19	Required emissions tests.
FACILITY	6NYCRR 202-1.2	31	Notification.
FACILITY	6NYCRR 202-1.3(a)	32	Acceptable procedures - reference methods
FACILITY	6NYCRR 202-2.1	6	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	7	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.2	77	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 211.3	20	General Prohibitions - visible emissions limited
FACILITY	6NYCRR 215	8	Open Fires
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
FACILITY	6NYCRR 225-1.2(a)(2)	33, 34	Sulfur in Fuel Limitations Post 12/31/87.
FACILITY	6NYCRR 225-1.8	35	Reports, sampling and analysis.
FACILITY	6NYCRR 225-3.3(a)	36	RVP Limitation - May 1st through September 15th
FACILITY	6NYCRR 225-3.4(a)	37	Gasoline records to be maintained
FACILITY	6NYCRR 225-3.4(b)	38	Records to be provided with distributed gasoline
FACILITY	6NYCRR 225-3.4(d)	39	Maintenance and availability of gasoline records
1-TANKS	6NYCRR 229.1(d)(2)(i)	70	New requirements outside NYCMA/LOCMA petroleum fixed roof tanks
FACILITY	6NYCRR 229.1(d)(2)(iv)	40	New requirements outside NYCMA/LOCMA gasoline terminals
1-TANKS	6NYCRR 229.3(a)	71	Petroleum fixed roof tank control requirements
1-RACKS	6NYCRR 230.4(a)(1)	48	Gasoline transport vehicles - prohibitions and requirements.
1-RACKS	6NYCRR 230.4(a)(2)	49	Gasoline transport

			vehicles - prohibitions and requirements.
1-RACKS	6NYCRR 230.4(a)(3)	50	Gasoline transport vehicles - prohibitions and requirements.
1-RACKS	6NYCRR 230.4(b)	51	Gasoline transport vehicles - prohibitions and requirements.
1-RACKS	6NYCRR 230.4(e)	52	Gasoline transport vehicles - prohibitions and requirements.
1-RACKS	6NYCRR 230.4(f)	53	Gasoline transport vehicles - prohibitions and requirements.
1-RACKS	6NYCRR 230.4(g)	54	Gasoline transport vehicles - prohibitions and requirements.
1-RACKS	6NYCRR 230.6(a)	55	Gasoline transport vehicles - recordkeeping and reporting.
1-RACKS	6NYCRR 230.6(b)	56	Gasoline transport vehicles - recordkeeping and reporting.

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

ECL 19-0301
This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6 NYCRR 200.6
Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6 NYCRR 200.7
Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6 NYCRR 201-1.4
This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6 NYCRR 201-1.7
Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8
Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)
An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR 201-3.3 (a)
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.

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 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 Part 215
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.

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, PETROLEUM FUEL & TERMINAL CO-RENSSELAER has been determined to be subject to the following regulations:
40 CFR 63.11081 (a)
This citation explains which facilities are applicable to this regulation.

40 CFR 63.11083 (b)
This citation explains when the facility must comply with the regulation.

40 CFR 63.11087
This citation explains the requirements the tanks must meet in order to be in compliance with the regulation.

40 CFR 63.11088
This citation explains the requirements the gasoline loading racks must meet in order to be in compliance with the regulation.

40 CFR 63.11089
This citation explains the requirements the equipment leak inspections must meet in order to be in compliance with the regulation.

40 CFR 63.11092 (a)
This citation explains what testing and monitoring must be completed to show compliance with the 80 milligrams per liter of gasoline loaded emission standard.

40 CFR 63.11092 (a) (2)
This citation explains what testing and monitoring must be completed to show compliance with the 80 milligrams per liter of gasoline loaded emission standard.

40 CFR 63.11092 (a) (3)
This citation explains what testing and monitoring must be completed to show compliance with the 80 milligrams per liter of gasoline loaded emission standard.

40 CFR 63.11092 (b) (1) (iii)
This regualtion explains what the facility must monitor for a thermal oxidizer to ensure compliance with the regulation.

40 CFR 63.11094 (b)
This citation explain the recordkeeping requirements for the gasoline cargo tanks loading at the terminal.

40 CFR 63.11094 (c)
This citation describes the alternative gasoline cargo tank compliance option for the terminal.

40 CFR 63.11094 (d)
This citation describes the recordkeeping requirements for equipment leak provisions.

40 CFR 63.11094 (e)
This citation describes the recordkeeping requirements for equipment leak provisions.

40 CFR 63.11094 (f)
This citation describes what records must be maintained to ensure compliance with the vapor processing system at the rack for loading of cargo tanks.

40 CFR 63.11095 (a)
This citation describes what the facility must report to the Administrator to ensure compliance.

40 CFR 63.11095 (b)
This citation describes what must be reported to the administrator if there is an excess emission at the facility.

40 CFR 63.11098
This citation describes which table to follow to ensure compliance with the general provisions of this

regulation.

40 CFR Part 63, Subpart R
This regulation is for a source that is major for Hazardous Air Pollutants (HAP) and this facility is not major for HAP.

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 202-1.2
This regulation specifies that the department is to be notified at least 30 days in advance of any required stack test. The notification is to include a list of the procedures to be used that are acceptable to the department. Finally, free access to observe the stack test is to be provided to the department's representative.

6 NYCRR 202-1.3 (a)
This regulation requires that any emission testing, sampling and analytical determination used to determine compliance must use methods acceptable to the department. Acceptable test methods may include but are not limited to the reference methods found in 40 CFR Part 60 appendix A and Part 61, appendix B. In addition, unless otherwise specified, all emission test reports must be submitted within 60 days after completion of testing.

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 s ubmit 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 225-3.3 (a)

6 NYCRR 225-3.4 (a)
This regulation requires the owner or operator of any refinery, terminal or bulk plant to maintain records of the amount of gasoline delivered to or distributed from the facility.

6 NYCRR 225-3.4 (b)
This regulation specifies the records that shall be provided with gasoline distributed from the facility. These include the maximum Reid vapor pressure of the gasoline, the time period it is intended to be dispensed and the quanity and shipment date.

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

6 NYCRR 229.1 (d) (2) (i)
This requires the owners or operators of specific types of sources located at facilities in areas other than the New York City metropolitan area or the Lower Orange County metropolitan area , which were designated as nonattainment areas for ozone on or after August 23, 1979, to comply with this Part according to a specific date or compliance schedule (subdivision(g)) and specified control requirements of section 229.3 of this Part.

6 NYCRR 229.1 (d) (2) (iv)
This requires the owners or operators of specific types of sources located at facilities in areas other than the New York City metropolitan area or the Lower Orange County metropolitan area , which were designated as nonattainment areas for ozone on or after August 23, 1979, to comply with this Part according to a specific date or compliance schedule (subdivision(g)) and specified control requirements of section 229.3 of this Part.

6 NYCRR 229.3 (a)
This subdivision contains the control requirements for petroleum fixed roof tanks.

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 integerity.

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.

6 NYCRR Subpart 201-7
This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit that cap is for Hazardous Air Pollutants (HAP) either less than 10 tons per year of individual HAP and less than 25 tons per year for combined HAP.

ECL 19-0301 (3) (b)
This requirement prohibits the use of methyl tertiary butyl ether as an oxygenate in any motor fuel imported into, or sold or offered for sale in New York state as of January 1, 2004.

Compliance Certification
Summary of monitoring activities at PETROLEUM FUEL & TERMINAL CO-RENSSELAER:

Location	Cond No.	Type of Monitoring

Facility/EU/EP/Process/ES

FACILITY	75	record keeping/maintenance procedures
1-TANKS/-/GAS	72	record keeping/maintenance procedures
1-RACKS/-/RBL	59	record keeping/maintenance procedures
1-TANKS/-/GAS	73	record keeping/maintenance procedures
1-RACKS/-/RBL	60	intermittent emission testing
1-RACKS/-/RBL	63	record keeping/maintenance procedures
1-RACKS/-/RBL	64	record keeping/maintenance procedures
1-RACKS/-/RBL	65	record keeping/maintenance procedures
1-RACKS/-/RBL	66	record keeping/maintenance procedures
1-RACKS/-/RBL	67	record keeping/maintenance procedures
1-RACKS/-/RBL	68	record keeping/maintenance procedures
FACILITY	43	record keeping/maintenance procedures
1-RACKS/-/RBL	69	record keeping/maintenance procedures
1-RACKS	57	record keeping/maintenance procedures
1-RACKS	58	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	24	record keeping/maintenance procedures
FACILITY	26	intermittent emission testing
FACILITY	27	work practice involving specific operations
FACILITY	28	work practice involving specific operations
FACILITY	29	work practice involving specific operations
FACILITY	30	work practice involving specific operations
FACILITY	6	record keeping/maintenance procedures
FACILITY	33	work practice involving specific operations
FACILITY	34	work practice involving specific operations
FACILITY	35	record keeping/maintenance procedures
FACILITY	36	work practice involving specific operations
FACILITY	37	record keeping/maintenance procedures
FACILITY	38	record keeping/maintenance procedures
FACILITY	39	record keeping/maintenance procedures
1-RACKS	48	monitoring of process or control device parameters as surrogate
1-RACKS	51	intermittent emission testing
1-RACKS	53	monitoring of process or control device parameters as surrogate
1-RACKS	55	record keeping/maintenance procedures
1-RACKS	56	record keeping/maintenance procedures

Basis for Monitoring
6 NYCRR 201-6.5(c)(3)(ii)

The facility must submit semi annual reports that report deviations to ensure compliance with each monitoring activity.

6 NYCRR 202-2.1

Emission statements shall be submitted to the department on a yearly basis due April 15th of each year.

6 NYCRR 201-6.5(e)

The facility must submit annual compliance certification reports to ensure compliance with permit conditions.

6 NYCRR 201-7

The facility shall limit throughput of kerosene, gasoline, fuel oil and distillates to limit the emissions of hazardous air pollutants (HAP) below the applicability thresholds of 40 CFR 63 Subpart R.

6 NYCRR 225-1.2(a)(2)

The facility shall limit sulfur by weight in distillate product to reduce the amount of sulfur dioxide being emitted to the atmosphere when burned.

6 NYCRR 225-3.3(a)

The facility will monitor the Reid Vapor Pressure (RVP) of gasoline to ensure that during the May 1st-September 15th that the RVP shall not exceed 9.0 pounds per square inch absolute.

6 NYCRR 225-3.4

The facility will keep records for the gasoline in accordance with this rule.

40 CFR 63.11095(a) Subpart BBBBBB

A semiannual compliance report is due for storage vessels, loading racks and equipment leak inspections to ensure Hazardous Air Pollutants (HAP) emissions are minimized.

6 NYCRR 202-1.1

Stack test shall be conducted to ensure that the emission rate does not exceed 80 milligrams/liter of gasoline loaded.

6 NYCRR 230

The cargo tanks shall be vacuum tested and pressure tested to minimize emissions from cargo tanks. They also must maintain documentation in the truck to ensure testing was done.

40 CFR 64

The flare shall be monitored to make sure there is a pilot flame present while loading cargo tanks and semiannual maintenance shall be done by an outside contractor to ensure proper operation of the flare unit. This is done to ensure that all emissions of VOC and HAP are minimized.

40 CFR 63.11088 Subpart BBBBBB

This citation explains the requirements for the rack sytem to ensure that while tucks are loading the Total Organic Compounds emissions will be kept to a minimum.

40 CFR 63.11094 Subpart BBBBBB

This citation explains the requirements for cargo tanks loading at the rack and equipment leak inspections to minimize emissions of Total Organic Compounds. This regulation also describes the records the facility must keep.

40 CFR 63.11095(b) Subpart BBBBBB

This citation explains that the facility must submit semi annually a excess emission report.

40 CFR 63.11087 Subpart BBBBBB

This citation explains what the facility must do to minimize bulk storage tank emissions.

40 CFR 63.11089 Subpart BBBBBB

This citation explains what the facility must do to minimize leaks in gasoline service.

ECL 19-0301(3)(b)

This law states that MTBE shall no longer be used as an oxygenate in gasoline in New York State.