New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-3824-00019/00013
Renewal Number: 2
Modification Number: 2 01/27/2014

Facility Identification Data
Name: BUCKEYE RENSSELAER TERMINAL
Address: 367 AMERICAN OIL RD
RENSSELAER, NY 12144

Owner/Firm
Name: BUCKEYE TERMINALS LLC
Address: 9999 HAMILTON BLVD - TEK PARK 5
BREINIGSVILLE, PA 18031, USA
Owner Classification: Corporation/Partnership

Permit Contacts
Division of Environmental Permits:
Name: NANCY M BAKER
Address: NYSDEC
1130 N WESTCOTT RD
SCHENECTADY, NY 12306-2014
Phone:5183572069

Division of Air Resources:
Name: DONALD A WELSTED
Address: NYSDEC
1130 N WESTCOTT RD
SCHENECTADY, NY 12306

Air Permitting Facility Owner Contact:
Name: MARK BONENBERGER
Address: BUCKEYE PIPELINE CO LP
5002 BUCKEYE RD PO BOX 368
EMMAUS, PA 18049-0368
Phone:6109044467

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
Department intiated modification to include caps taken by the facility.

Attainment Status
BUCKEYE RENSSELAER TERMINAL is located in the town of EAST GREENBUSH 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:
Facility handles a variety of petroleum products for distribution.

Permit Structure and Description of Operations
The Title V permit for BUCKEYE RENSSELAER 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.

BUCKEYE RENSSELAER TERMINAL is defined by the following emission unit(s):

Emission unit U00002 - Fixed roof additive storage tanks for petroleum hydrocarbon liquids with a RVP less than 0.1 psia.

Emission unit U00002 is associated with the following emission points (EP):
00001, 01516
Process: 102 is located at 1 - Storage and transfer of petroleum hydrocarbon additive liquids with a vapor pressure less than 0.1 psia.

Emission unit U00003 - Truck loading racks for petroleum hydrocarbon liquids with a maximum annual average RVP of 12.5 psia. Emission control with carbon adsorption unit (VRU). (gasoline truck loading rack)

Emission unit U00003 is associated with the following emission points (EP):
00003
Process: 103 is located at TANK FARM - Transfer of petroleum hydrocarbon liquids with a maximum annual average RVP of 12.5 psia emission control with carbon adsorption unit. (gasoline truck loading rack).

Emission unit U00006 - Marine loading of distillate and residual fuel oil with vapor pressures less than or equal to kerosene.

Emission unit U00006 is associated with the following emission points (EP):
00010
Process: 001 is located at Marine Loading Dock - Marine loading of distillate and residual fuel oils with vapor pressures less than or equal to kerosene.

Emission unit U00005 - 20.92 MMBtu/hr Cleaver Brooks, burns No. 6 fuel oil.

Emission unit U00005 is associated with the following emission points (EP):
00005
Process: 105 is located at first floor - 20.922 MMBtu/hr boiler burns No. 6 fuel oil at 0.5% sulfur by weight.

Emission unit U00004 - Truck loading for petroleum hydrocarbon liquids with a vapor pressure less than or equal to kerosene. (Distillate/residual truck rack). Dimensions are not applicable since this is not a point source. One is entered as a default.

Emission unit U00004 is associated with the following emission points (EP):
00004
Process: 104 is located at TANK FARM - Transfer of petroleum hydrocarbon liquids with a vapor pressure less than or equal to kerosene. (Distillate/residual truck rack).

liquids with a maximum annual average RVP of 12.5 psia.

Emission unit U00001 is associated with the following emission points (EP):
01503, 01505, 01506, 01510, 01511, 01512
Process: 101 is located at TANK FARM - Storage and transfer of petroleum hydrocarbon liquids with a maximum annual average RVP of 12.5 psia.

Title V/Major Source Status
BUCKEYE RENSSELAER TERMINAL is subject to Title V requirements. This determination is based on the following information:
The following facility is major because the Volatile Organic Compounds (VOC) emitted at the facility are higher than that of major thresholds, the facility does not exceed major thresholds for Hazardous Air Pollutants (HAP).

Program Applicability
The following chart summarizes the applicability of BUCKEYE RENSSELAER 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	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
1-02-004-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - RESIDUAL OIL 10-100MMBTU/HR **
4-03-010-79	PETROLEUM PRODUCT STORAGE AT REFINERIES PETROLEUM PRODUCT STORAGE - FIXED ROOF TANKS (VARYING SIZES) FIXED ROOF TANK:INDEPENDENT TANK DIAMETER;WORKING LOSS;FUEL OIL GRADE1
4-04-001-16	BULK TERMINALS/PLANTS BULK TERMINALS GASOLINE RVP13/RVP10/RVP7: WITHDRAWAL LOSS (67000 BBL)FLOATING ROOF
4-04-001-50	BULK TERMINALS/PLANTS BULK TERMINALS BULK TERMINALS:MISCELLANEOUS LOSSES/LEAKS:LOADING RACKS
4-06-001-41	TRANSPORTATION AND MARKETING OF PETROLEUM PRODUCTS TANK CARS AND TRUCKS GASOLINE: SUBMERGED LOADING (BALANCED SERVICE)
4-06-002-50	TRANSPORTATION AND MARKETING OF PETROLEUM PRODUCTS TRANSPORTATION AND MARKETING OF PETROLEUM PRODUCTS - MARINE VESSELS Kerosene: Loading Barges

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	Range
0NY502-00-0	40 CFR 60-63 - TOTAL ORGANIC COMPOUNDS (TOC)		>= 50 tpy but < 100 tpy
000071-43-2	BENZENE	19000	
000098-82-8	BENZENE, (1-METHYLETHYL)	19000	
000630-08-0	CARBON MONOXIDE		>= 2.5 tpy but < 10 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		>= 40 tpy but < 50 tpy
0NY075-00-0	PARTICULATES		>= 2.5 tpy but < 10 tpy
000540-84-1	PENTANE, 2,2,4-TRIMETHYL-	19000	
0NY075-00-5	PM-10		>= 2.5 tpy but < 10 tpy
007446-09-5	SULFUR DIOXIDE		>= 50 tpy but < 100 tpy
000108-88-3	TOLUENE	19000	
0NY100-00-0	TOTAL HAP	47500	
0NY998-00-0	VOC		>= 50 tpy but < 100 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	Regulation	Condition	Short Description
Facility/EU/EP/Process/ES			

FACILITY	ECL 19-0301	66	Powers and Duties of the Department with respect to air pollution control
FACILITY	ECL 19-0301.(3)(b)	67	Prohibition of the use of methyl tertiary butyl ether (MTBE) as a motor fuel oxygenate
U-00005	40CFR 50	65	National Primary and Secondary Ambient Air Quality Standards
FACILITY	40CFR 63-BBBBBB.11081(a	2 -6	Definition of affected source
FACILITY	40CFR 63-BBBBBB.11083(b	2 -7	Compliance date for an existing affected source
U-00001	40CFR 63-BBBBBB.11087	2 -11	NESHAP for Area Source Gasoline Bulk Terminals - Requirements for Tanks
U-00003	40CFR 63-BBBBBB.11088	2 -12	NESHAP for Area Source Bulk Gasoline Terminals - Requirements for Loading Racks
U-00003	40CFR 63-BBBBBB.11089	2 -13	NESHAP for Area Source Gasoline Bulk Terminals - Equipment Leak Inspections
U-00003	40CFR 63-BBBBBB.11092(a	2 -14	NESHAP for Area Source Gasoline Bulk Terminals - Testing and Monitoring Provisions
U-00003	40CFR 63-BBBBBB.11092(a	2 -15	Testing and monitoring provisions - gasoline loading racks
U-00003	40CFR 63-BBBBBB.11092(a	2 -16	Testing and monitoring requirements - Gasoline loading racks
U-00003	40CFR 63-BBBBBB.11092(b	2 -17, 2 -18, 2 - 19	NESHAP for Area Source Gasoline Bulk Terminals - Testing and Monitoring Provisions
U-00003	40CFR 63-BBBBBB.11092(b	2 -20	NESHAP for Area Source Gasoline Bulk Terminals - Testing and Monitoring Provisions
U-00003	40CFR 63-BBBBBB.11093(c	2 -21	NESHAP for Area Source Gasoline Bulk Terminals - Notifications
U-00003	40CFR 63-BBBBBB.11094(b	2 -22	NESHAP for Area Source Gasoline Bulk Terminals -

			Recordkeeping
U-00003	40CFR 63-BBBBBB.11094(c	2 -23	NESHAP for Area Source Gasoline Bulk Terminals - Recordkeeping
U-00003	40CFR 63-BBBBBB.11094(d	2 -24	NESHAP for Area Source Bulk Gasoline Terminals - Recordkeeping
U-00003	40CFR 63-BBBBBB.11094(e	2 -25	NESHAP for Area Source Gasoline Bulk Terminals - Recordkeeping
U-00003	40CFR 63-BBBBBB.11094(f	2 -26	NESHAP for Area Source Gasoline Bulk Terminals - Recordkeeping
FACILITY	40CFR 63-BBBBBB.11095(a	2 -8	NESHAP for Area Source Gasoline Bulk Terminals - Reporting
U-00003	40CFR 63-BBBBBB.11095(b	2 -27	NESHAP for Area Source Gasoline Bulk Terminals - Reporting
FACILITY	40CFR 63-BBBBBB.11098	2 -9	NESHAP for Area Source Gasoline Bulk Terminals - General Provisions
FACILITY	40CFR 63-R	2 -3, 2 -4, 2 -5	Subpart R- Gasoline Distribution Facility NESHAP
U-00003	40CFR 64	2 -28, 2 -29, 2 -30, 2 -31	COMPLIANCE ASSURANCE MONITORING
FACILITY	40CFR 68	20	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	9	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	2 -32	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	10	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	11	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	12	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	13	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	22, 34, 35	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5(a)(4)	14	General conditions
FACILITY	6NYCRR 201-6.5(a)(7)	2	General conditions Fees
FACILITY	6NYCRR 201-6.5(a)(8)	15	General conditions
FACILITY	6NYCRR 201-6.5(c)	3	Permit conditions for Recordkeeping and

FACILITY	6NYCRR 201-6.5(c)(2)	4	Reporting of Compliance Monitoring Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(3)(ii	5	Reporting of Compliance Monitoring Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(d)(5)	16	Compliance schedules
FACILITY	6NYCRR 201-6.5(e)	23	Compliance Certification
FACILITY	6NYCRR 201-6.5(f)(6)	17	Off Permit Changes
FACILITY	6NYCRR 201-7	2 -2, 2 -3, 2 -4, 2 -5, 2 -10	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-1.1	18	Required emissions tests.
FACILITY	6NYCRR 202-1.2	24	Notification.
FACILITY	6NYCRR 202-1.3(a)	25	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	2 -33	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 211.3	19	General Prohibitions - visible emissions limited
FACILITY	6NYCRR 215.2	2 -1	Open Fires - Prohibitions
FACILITY	6NYCRR 225-1.2(a)(2)	26, 27	Sulfur in Fuel Limitations Post 12/31/87.
FACILITY	6NYCRR 225-1.8	28	Reports, sampling and analysis.
FACILITY	6NYCRR 229.1(d)(2)(iv)	29	New requirements outside NYCMA/LOCMA gasoline terminals
U-00001	6NYCRR 229.3(a)	36	Petroleum fixed roof tank control requirements
U-00003	6NYCRR 230.4(a)(1)	39	Gasoline transport vehicles - prohibitions and requirements.
U-00003	6NYCRR 230.4(a)(2)	40	Gasoline transport vehicles - prohibitions and requirements.
U-00003	6NYCRR 230.4(a)(3)	41	Gasoline transport vehicles - prohibitions and requirements.
U-00003	6NYCRR 230.4(b)	42	Gasoline transport vehicles - prohibitions and requirements.
U-00003	6NYCRR 230.4(e)	43	Gasoline transport vehicles - prohibitions and

			requirements.
U-00003	6NYCRR 230.4(f)	44	Gasoline transport vehicles - prohibitions and requirements.
U-00003	6NYCRR 230.4(g)	45	Gasoline transport vehicles - prohibitions and requirements.
U-00003	6NYCRR 230.6(a)	46	Gasoline transport vehicles - recordkeeping and reporting.
U-00003	6NYCRR 230.6(b)	47	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 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, BUCKEYE RENSSELAER TERMINAL has been determined to be subject to the following regulations:

40 CFR 63.11081 (a)
This citation states what facilities are subject to this rule.

40 CFR 63.11083 (b)
This citation explains when the facility must come into compliance with this subpart.

40 CFR 63.11087
This citation explains the requirements for storage tanks.

40 CFR 63.11088
This explains the requirements of the loading racks.

40 CFR 63.11089
This regulation explains the requirements for equipment leak inspections that are required.

40 CFR 63.11092 (a)
Those facilties subject to the emission standards in 40 CFR 63.11088 must comply with this citation.

40 CFR 63.11092 (a) (2)
Emission limits of rack system and how the facility can comply with the emission limits.

40 CFR 63.11092 (a) (3)
Emission limits of rack system and how the facility can comply with the emission limits.

40 CFR 63.11092 (b) (1) (i) ('B') ('1')
This condition describes the monitoring and reporting requirements of the vapor recovery unit at the site.

40 CFR 63.11092 (b) (1) (i) ('B') ('2')
This condition describes the monitoring requirements for the Vapor Recovery Unit.

40 CFR 63.11093 (c)
This citation explains the notifications that a facility must submit to the administrator.

40 CFR 63.11094 (b)
This cititation explains the recordkeeping requirements that the facility must keep.

40 CFR 63.11094 (c)
This cititation explains the recordkeeping requirements that the facility must keep.

40 CFR 63.11094 (d)
This cititation explains the recordkeeping requirements that the facility must keep.

40 CFR 63.11094 (e)
This cititation explains the recordkeeping requirements that the facility must keep.

40 CFR 63.11094 (f)
This cititation explains the recordkeeping requirements that the facility must keep.

40 CFR 63.11095 (a)
The requirements of the semiannual compliance report.

40 CFR 63.11095 (b)
Excess emission report that must be submitted to the administrator.

40 CFR 63.11098
This explains the general provisions that the facility must comply with.

40 CFR Part 50
To ensure compliance with NAAQS SO2 requirements the facility must limit its sulfur content to 0.5% by weight in its fuel for the boiler.

40 CFR Part 63, Subpart R

The condition limits the gasoline throughput below the threshold levels of 40CFR63, Subpart R.This is the national emission standard for hazardous air pollutants for bulk gasoline terminals and pipeline breakout stations.

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 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 HAP HAzardous Air Pollutants.

ECL 19-0301 (3) (b)
This regulation is active for this permit.

Compliance Certification
Summary of monitoring activities at BUCKEYE RENSSELAER TERMINAL:

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

FACILITY	67	record keeping/maintenance procedures
U-00005	65	work practice involving specific operations
U-00001	2-11	record keeping/maintenance procedures
U-00003	2-12	record keeping/maintenance procedures
U-00003	2-13	record keeping/maintenance procedures
U-00003	2-14	intermittent emission testing
U-00003	2-17	record keeping/maintenance procedures
U-00003	2-18	record keeping/maintenance procedures
U-00003	2-19	record keeping/maintenance procedures
U-00003	2-20	record keeping/maintenance procedures
U-00003	2-22	record keeping/maintenance procedures
U-00003	2-23	record keeping/maintenance procedures
U-00003	2-24	record keeping/maintenance procedures
U-00003	2-25	record keeping/maintenance procedures
U-00003	2-26	record keeping/maintenance procedures
FACILITY	2-8	record keeping/maintenance procedures
U-00003	2-27	record keeping/maintenance procedures
U-00003	2-28	record keeping/maintenance procedures
U-00003	2-29	monitoring of process or control device parameters as surrogate
U-00003	2-30	monitoring of process or control device parameters as surrogate
U-00003	2-31	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	23	record keeping/maintenance procedures
FACILITY	2-3	intermittent emission testing
FACILITY	2-4	work practice involving specific operations
FACILITY	2-5	work practice involving specific operations
FACILITY	6	record keeping/maintenance procedures
FACILITY	26	work practice involving specific operations
FACILITY	27	work practice involving specific operations
FACILITY	28	record keeping/maintenance procedures
U-00003	39	monitoring of process or control device parameters as surrogate
U-00003	42	intermittent emission testing
U-00003	46	record keeping/maintenance procedures
U-00003	47	record keeping/maintenance procedures

Basis for Monitoring

6 NYCRR 201-6.5(c)(3)(ii) The facility must monitor their permit requirements for both semi-anuual and annual reports to establish that they are in compliance with permit conditions.

6 NYCRR 202-2.1 The facility must monitor the emissions and submit a report on them on or before April 15th for the previous calendar year.

6 NYCRR 201-6.5(e) The facility must submit compliance certifications for requirements in the permit.

6 NYCRR 225-1.2(a)(2) The facility must monitor the distillate and residual fuel oil they buy it must have a sulfur content less than 1.5% by weight.

6 NYCRR 225-1.8 The facility shall keep records and monitor the sulfur content of fuel oil burned.

40 CFR 63.11095(a) Subpart BBBBBB A semiannual compliance report is due on the storage vessels, loading racks and equipment leak inspection.

40 CFR 63.11087 Subpart BBBBBB The internal floating roof in the tank must be monitored to determine

compliance with rule.

6 NYCRR 202-1.1 The carbon absorption unit shall be montiored to make sure it is in compliance with less than 80 mg/liter of gasoline loaded.

6 NYCRR 230.4(a)(1) The gasoline transport vehicles shall be monitored to ensure that there is a seal and pressure does not drop more than 3 inches of water.

6 NYCRR 230.4(b) The gasoline transport vehicles must be tested annually to monitor the presure drop of the storage container.

6 NYCRR 230.6(a) The gasoline transport vehicle must monitor and maintain records of the pressure vacuum test and all repairs made.

6 NYCRR 230.6(b) A copy of the vacuum pressure test must be maintained and kept with the gasoline transport vehicle.

40 CFR 63.11088 Subpart BBBBBB The vapor collection system must be monitored to ensure that the unit is attaining 80mg/liter of gasoline loaded.

40 CFR 63.11089 Subpart BBBBBB The equipment in gasoline service must be monitored to make sure there are not any leaks to ensure compliance with this rule.

40 CFR 63.11092(a) Subpart BBBBBB Intermittent emission testing shall be done on the vapor collection equipment to ensure that the equipment is in compliance with this rule.

40 CFR 63.11092(b)(1)(i)('A') For the intermittent emission monitoring a CEM will be used to ascertain whether or not the vapor collection system is in compliance with this rule.

40 CFR 63.11094(b) Subpart BBBBBB A gasoline cargo tank shall be montored to ensure vapor tightness is achieved and in compliance with this rule.

40 CFR 63.11094(c) Subpart BBBBBB Any gasoline cargo tank that is loaded at the facility shall have an electronic copy of proof of vapor tightness.

40 CFR 63.11094(d) Subpart BBBBBB The facility will monitor and keep records for equipment leaks at facility that are in gasoline service.

40 CFR 63.11094(e) Subpart BBBBBB The facility will keep records for all leaking pieces of equipment in accordance with this rule.

40 CFR 63.11094(f) Subpart BBBBBB This rule states of the monitoring that must be done the facility shall keep records in accordance with this rule.

40 CFR 63.11095(b) The facility will submit an excess emissions report at the time the semi-annual report is submitted and the information to be included in the report is the included in this rule.

40 CFR 64 Monitoring must be done on certain parameters of the vapor recovery unit to ensure the unit is in compliance with emission limits in the permit.

40 CFR 50 For the boiler all oil burned must be monitored and be less than 0.5% sulfur by weight.

ECL 19-0301.3(b) MTBE shall not be used as a fuel additive.