



**STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR MANAGEMENT**

**NEW SOURCE REVIEW PERMIT
TO CONSTRUCT AND OPERATE
A STATIONARY SOURCE**

Issued pursuant to Title 22a of the Connecticut General Statutes and Section 22a-174-3a of the Regulations of Connecticut State Agencies.

Owner/Operator: Gulf Oil Limited Partnership
Address: 100 Crossing Boulevard, Framingham, MA 01702
Equipment Location: Waterfront Terminal, 428-500 Waterfront Street, New Haven, Connecticut 06517
Equipment Description: Gasoline and Distillate Truck Loading Rack w/ Jet Additive System

Permit Number: 0241
Town/Premises Numbers: 117/243
Permit Issue Date: September 14, 2010
Prior Permit Issue Date: January, 1999 (Construction Permit)
April 13, 1999 (Operating Permit)
September 6, 2005 (Minor Permit Modification)
Expiration Date: None

/s/ Anne Gobin for
Amey Marrella
Commissioner

September 14, 2010
Date

PERMIT FOR PROCESS EQUIPMENT

STATE OF CONNECTICUT, DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF AIR MANAGEMENT

PART I. PROCESS DESCRIPTION

A. General Process Description

Gulf Oil, Limited Partnership (Gulf Oil) has a New Haven terminal located on the eastern shore of New Haven Harbor. The terminal is bordered to the north by a marine terminal operated by the Getty Terminals Corporation. A second marine terminal facility, operated by the Gateway Terminal, is located south of the terminal. Waterfront Street forms the eastern boundary of the property.

Gulf Oil's New Haven terminal is a bulk petroleum terminal with principal operations consisting of the receipt, storage and distribution of gasoline and distillate products. Products handled at the facility are typically received by marine vessel at the terminal's vessel dock or by pipeline. Upon receipt, products are transferred via product piping to bulk aboveground storage tanks located in the terminal's tank farm. Final distribution of product is principally conducted at the terminal's truck loading rack. Gulf Oil also has the capability to distribute products to interstate and intrastate locations via a product pipeline owned and operated by Buckeye Pipeline, Inc. The terminal is not equipped for vessel loading operations.

The terminal consists of a truck loading rack with eight loading bays, four of which can load gasoline (bays #1, 2, 4, and 6). The rack has a product additive injection system to allow for Gulf Oil to conduct the injection of a jet fuel additive (Phillips Fuel Additive deicing agent) at the rack. A Vapor Recovery Unit (VRU) controls the emissions from the truck loading rack.

B. Equipment Design Specifications

1. Loading Rack with the capability to inject a Jet Fuel Additive at the rack and a John Zink Vapor Recovery Unit
2. Gasoline Additives: Ethanol and EPA mandated additives
3. Jet Fuel Additive: Phillips Fuel Additive or PFA-56; deicing agent
4. Aboveground Storage tank for the Jet Fuel Additive: Tank #119
5. Capacity of Tank: 2,000 gallons

FIRM NAME:	Gulf Oil Limited Partnership
EQUIPMENT LOCATION:	428-500 Waterfront Street, New Haven, CT
EQUIPMENT DESCRIPTION (MODEL, I.D. #):	Gasoline and Distillate Truck Loading Rack w/ Jet Additive System

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BUREAU OF AIR MANAGEMENT****PART I. PROCESS DESCRIPTION, Continued****C. Control Equipment Specifications**

1. John Zink Vapor Recovery Unit (VRU)
2. Guaranteed Control Limitation: 10 mg of total organic compounds/L of gasoline loaded

D. Stack Parameters

1. Minimum Stack Height: 14.765 Ft
2. Minimum Exhaust Gas Flow Rate: 1162.66 ACFM
3. Minimum Distance From Vent To Closest Property Line: 230 Feet

PART II. OPERATING REQUIREMENTS

Notwithstanding the design specifications or description provided in Part I, above, the Permittee of the subject source shall comply with the following operating requirements:

A. Operating Parameter Limitations

1. Equipment
 - a. Material Being Loaded: Gasoline and Distillate Products
 - b. Gasoline Additives: Ethanol and MTBE
 - c. Jet Fuel Additive: Phillips Fuel Additive or PFA-56 deicing agent
 - d. Storage Tank for the Jet Fuel Additive: Tank #119
 - e. Capacity of Tank: 2,000 gallons
 - f. Allowable Emission rate from the VRU: 10 milligrams of total organic compounds per liter of gasoline loaded
 - g. Allowable Fugitive Emission rate: 13 milligrams of total organic compounds per liter of gasoline loaded

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PART II. OPERATING REQUIREMENTS, Continued

2. Controls

- a. John Zink Vapor Recovery Unit (VRU)
- b. Guaranteed Control Limitation: 10 mg of total organic compounds /L of gasoline loaded

B. Emission Limits

1. Criteria Pollutants

The source shall not exceed the emission limits stated herein in any consecutive 12 month period.

<u>Pollutants</u>	<u>mg/l of gasoline loaded</u>	<u>TPY</u>
<i>From the John Zink Vapor Recovery Unit:</i>		
VOC	10	22.82
<i>Fugitive emissions from loading cargo tanks:</i>		
VOC	13	29.67
<i>Emissions from the Jet Fuel Additive System:</i>		
VOC		0.01
<i>Total Emissions:</i>		
VOC		52.50

Demonstration of compliance with the above emission limits shall be met by calculating the emission rates using emission factors from the following sources:

- i. NESHAP, 40 CFR Subpart 63.422(b)
- ii. NESHAP, 40 CFR Subpart 63.420(a)(1)

The above statement shall not preclude the commissioner from requiring other means (e.g. stack testing) to demonstrate compliance with the above emission limits, as allowed by state or federal statute, law or regulation.

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PART II. OPERATING REQUIREMENTS, Continued

2. Hazardous Air Pollutants (HAPs)

This equipment shall not cause an exceedance of the Maximum Allowable Stack Concentration (MASC) for any hazardous air pollutant (HAP) emitted and listed in RCSA Section 22a-174-29. [**STATE ONLY REQUIREMENT**]

PART III. STACK EMISSION TEST REQUIREMENTS (see Appendix B for General Requirements if applicable)

Stack emission/performance testing shall be required on a five year reoccurring basis starting with five years from the previously performed test:

- None at this time
- TSP
- SOx
- CO
- Pb
- PM-10
- NOx
- VOC
- Other (HAPs): TOCs,

PART IV. MONITORING, RECORD KEEPING AND REPORTING REQUIREMENTS

A. Monitoring Requirements

1. The Permittee shall install, calibrate, certify, operate, and maintain, according to the vapor processing system manufacturer's specifications, a continuous emission monitoring system (CEMS) capable of measuring organic compound concentration in the exhaust air stream.
2. The carbon adsorption system (the VRU) and the booster shall be operated by the Permittee to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack.
3. To ensure that the emissions remain at or below 10 mg/l of the gasoline loaded, the Permittee shall operate the VRU and the booster in accordance with all manufacturers' specifications and recommendations.
4. The Permittee shall operate the vapor processing system in a manner not to exceed the operating parameter value for the organic compound concentration in the exhaust system. Operation of the vapor processing system in a manner exceeding the operating parameter value, shall constitute a violation of the emission standard in Part II.B.2 of this permit.

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Town No: 117 Premises No: 88 Permit No: 0241 Stack No: 16

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5. The Permittee shall maintain daily VOC emissions and gasoline throughput volumes and a 365-day rolling total of the VOC emissions and gasoline throughput volumes. The current day's VOC emissions and gasoline throughput volume shall be added to the previous year's 364 day's VOC emissions and gasoline throughput volumes to obtain the 365-day rolling total of the VOC emissions and gasoline throughput volumes.

B. Record Keeping Requirements

1. The Permittee shall keep an up-to-date, readily accessible record of the continuous monitoring data required under Part IV.A.1 of this permit. This record shall indicate the time intervals during which loadings of gasoline cargo tanks have occurred or, alternatively, shall record the operating parameter data only during such loadings. The date and time of day shall also be indicated at reasonable intervals on this record.
2. The Permittee shall record daily gasoline throughput volume and shall record the 365-day rolling total of gasoline throughput volumes.
3. The Permittee shall keep all records for at least five years except if specified otherwise.

C. Reporting Requirements

1. The Permittee shall submit a semiannual report to the commissioner and shall include in the report the following information:
 - i. Each loading of a gasoline cargo tank for which vapor tightness documentation had not been previously obtained by the facility.
 - ii. The number of equipment leaks not repaired within five days after detection.
2. The Permittee shall submit an excess emissions report to the commissioner semiannually. [40 CFR §63.428(h)]

PART V. SPECIAL REQUIREMENTS

- A.** The Permittee shall operate and maintain all equipment subject to this permit in accordance with the manufacturer's specifications and written recommendations.

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PART V. SPECIAL REQUIREMENTS, Continued

- B. The Permittee shall comply with all applicable sections of RCSA §22a-174-20(b) at all times:
- C. The Permittee shall comply with all applicable sections of the following New Source Performance Standards at all times:

40 CFR Part 60 Subpart A;
40 CFR Part 60 Subpart XX.
- D. The Permittee shall comply with all applicable sections of the following National Emission Standards for Hazardous Air Pollutants for Source Categories at all times:

40 CFR Part 63 Subpart A;
40 CFR Part 63 Subpart R.

PART VI. ADDITIONAL TERMS AND CONDITIONS

- A. This permit does not relieve the Permittee of the responsibility to conduct, maintain and operate the regulated activity in compliance with all applicable requirements of any federal, municipal or other state agency. Nothing in this permit shall relieve the Permittee of other obligations under applicable federal, state and local law.
- B. Any representative of the DEP may enter the Permittee's site in accordance with constitutional limitations at all reasonable times without prior notice, for the purposes of inspecting, monitoring and enforcing the terms and conditions of this permit and applicable state law.
- C. This permit may be revoked, suspended, modified or transferred in accordance with applicable law.
- D. This permit is subject to and in no way derogates from any present or future property rights or other rights or powers of the State of Connecticut and conveys no property rights in real estate or material, nor any exclusive privileges, and is further subject to any and all public and private rights and to any federal, state or local laws or regulations pertinent to the facility or regulated activity affected thereby. This permit shall neither create nor affect any rights of persons of municipalities who are not parties to this permit.

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PART VI. ADDITIONAL TERMS AND CONDITIONS. Continued

- E.** Any document, including any notice, which is required to be submitted to the commissioner under this permit shall be signed by a duly authorized representative of the Permittee and by the person who is responsible for actually preparing such document, each of whom shall certify in writing as follows: "I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement made in the submitted information may be punishable as a criminal offense under Section 22a-175 of the Connecticut General Statutes, under Section 53a-157b of the Connecticut General Statutes, and in accordance with any applicable statute."
- F.** Nothing in this permit shall affect the commissioner's authority to institute any proceeding or take any other action to prevent or abate violations of law, prevent or abate pollution, recover costs and natural resource damages, and to impose penalties for violations of law, including but not limited to violations of this or any other permit issued to the Permittee by the commissioner.
- G.** Within 15 days of the date the Permittee becomes aware of a change in any information submitted to the commissioner under this permit, or that any such information was inaccurate or misleading or that any relevant information was omitted, the Permittee shall submit the correct or omitted information to the commissioner.
- H.** The date of submission to the commissioner of any document required by this permit shall be the date such document is received by the commissioner. The date of any notice by the commissioner under this permit, including but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is personally delivered or the date three days after it is mailed by the commissioner, whichever is earlier. Except as otherwise specified in this permit, the word "day" means calendar day. Any document or action which is required by this permit to be submitted or performed by a date which falls on a Saturday, Sunday or legal holiday shall be submitted or performed by the next business day thereafter.

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PART VI. ADDITIONAL TERMS AND CONDITIONS. Continued

- I. Any document required to be submitted to the commissioner under this permit shall, unless otherwise specified in writing by the commissioner, be directed to: Office of Director; Compliance & Field Operations Division; Bureau of Air Management; Department of Environmental Protection; 79 Elm Street, 5th Floor; Hartford, Connecticut 06106-5127.

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