



Connecticut Department of

**ENERGY &
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 (CGS) and Section 22a-174-3a of the Regulations of Connecticut State Agencies (RCSA).

Owner/Operator	Gulf Oil Limited Partnership
Address	80 William Street, Suite 400, Wellesley, MA 02481
Equipment Location	New Haven Terminal, 500 Waterfront Street, New Haven, CT 06517
Equipment Description	Marine Vessel Loading of Distillate Products
Town-Permit Numbers	117-0380
Premises Number	88
Stack Number	N/A
Permit Issue Date	December 7, 2018
Expiration Date	None

/s/ Robert E. Kaliszewski
Robert E. Kaliszewski
Deputy Commissioner

12/7/2018
Date

This permit specifies necessary terms and conditions for the operation of this equipment to comply with state and federal air quality standards. The Permittee shall at all times comply with the terms and conditions stated herein.

PART I. DESIGN SPECIFICATIONS

A. General Description

The marine vessel loading operation consists of loading distillate products onto marine vessels from above ground storage tanks in the terminal's tank farm as well as from product pipeline connections to nearby terminals. VOC emissions from the marine vessel operation are considered "loading losses" which occur as vapors formed in marine vessel cargo tanks are displaced to the atmosphere by the distillate products being loaded into the tanks.

B. Equipment Design Specifications

1. Numbers of Pump Connections: 2
2. Low Vapor Pressure Loading of Distillate Products

PART II. OPERATIONAL CONDITIONS

A. Equipment

1. Allowable Distillate Products to be Loaded: biodiesel, diesel, and No. 2 fuel oil
2. Maximum Vapor Pressure of Products to be Loaded: < 0.75 psi
3. Maximum Benzene Content of Products to be Loaded: < 10%, by weight
4. Maximum Pump Rate:
 - a. Single Connection
 - i. 588,000 gal/hr
 - ii. 14,000 barrels/hr
 - b. Two Connections (each)
 - i. 294,000 gal/hr
 - ii. 7,000 barrels/hr
5. Maximum Consecutive 12 Month Loading of Distillate Products:
 - a. 169,344,000 gal
 - b. 4,032,000 barrels
6. The Permittee shall operate and maintain this equipment in accordance with the manufacturer's specifications and written recommendations.

PART III. ALLOWABLE EMISSION LIMITS

The Permittee shall not cause or allow this equipment to exceed the emission limits stated herein at any time.

A. Criteria Pollutants

Pollutant	lb/hr	tpy
VOC	4.90	0.71

B. Hazardous Air Pollutants

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

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

- Mass Balance
- Compilation of Air Pollutant Emission Factors, AP-42, fifth edition, Section 5.2 Transportation And Marketing Of Petroleum Liquids, 5.2.2.1.1 Loading Losses, 6/08

The commissioner may require other means (e.g. stack testing) to demonstrate compliance with the above emission limits, as allowed by state or federal statute, law or regulation.

PART IV. MONITORING AND RECORD KEEPING REQUIREMENTS

A. Monitoring

1. The Permittee shall continuously monitor distillate product dispersion using a non-resettable totalizing fuel meter.
2. The Permittee shall continuously monitor the hourly, monthly and consecutive 12 month distillate product dispersion rate in gallons or barrels.
3. The Permittee shall monitor the vapor pressure of each distillate product loaded, in psi.
4. The Permittee shall monitor the benzene content of each distillate product loaded, in percent.

B. Record Keeping

1. The Permittee shall keep records of monthly and consecutive 12 month distillate product dispersion both by type and combined total. The consecutive 12 month distillate product dispersion shall be determined (for each type and combined) by adding the current month's distillate product dispersion to that of the previous 11 months. The Permittee shall make these calculations within 30 days of the end of the previous month.

2. The Permittee shall calculate and record the monthly and consecutive 12 month VOC emissions in units of tons. The consecutive 12 month emissions shall be determined by adding the current month's emissions to that of the previous 11 months. Such records shall include a sample calculation for the pollutant. The Permittee shall make these calculations within 30 days of the end of the previous month.
3. The Permittee shall keep a record of the vapor pressure of each distillate product loaded, in psi.
4. The Permittee shall keep a record of the benzene content of each distillate product loaded, in percent.
5. The Permittee shall keep all records required by this permit for a period of no less than five years and shall submit such records to the commissioner upon request.

PART V. SPECIAL REQUIREMENTS

A. Premises Emissions Summary

1. On January 1st of each calendar year, if the potential emissions of NO_x and/or VOC from the premises are equal to or greater than 25 tons per year per pollutant, then for such pollutant(s), the Permittee shall:
 - a. Monitor NO_x and/or VOC emissions, as applicable, from the premises for such calendar year.
 - b. Calculate and record annual NO_x and/or VOC emissions, as applicable, from the premises for such calendar year, in units of tons. The Permittee shall make these calculations on or before February 1st of the following year with respect to the previous calendar year. Such records shall include a sample calculation(s).
 - c. If actual NO_x and/or VOC emissions, as applicable, from the premises are equal to or greater than 25 tons for such calendar year, the Permittee shall submit to the commissioner, on or before March 1st of the following year, an annual emissions summary with respect to the premises for the previous calendar year. Such summary shall be submitted on forms prescribed or provided by the commissioner.
2. A Permittee with either of the following premises is exempt from Part V.A requirements of this permit if, on January 1st of the subject year, the:
 - a. Premises is operating in accordance with a valid Title V permit issued pursuant to RCSA Section 22a-174-33; or
 - b. Premises is operating in accordance with a valid Approval of Registration issued pursuant to the General Permit to Limit Potential to Emit from Major Stationary Sources of Air Pollution issued on November 9, 2015.

B. The Permittee shall not cause or permit the emission of any substance or combination of substances which creates or contributes to an odor beyond the property boundary of the premises that constitutes a nuisance as set forth in RCSA Section 22a-174-23.
[STATE ONLY REQUIREMENT]

C. The Permittee shall operate this facility at all times in a manner so as not to violate or contribute significantly to the violation of any applicable state noise control regulations, as

set forth in RCSA Sections 22a-69-1 through 22a-69-7.4. [STATE ONLY REQUIREMENT]

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 DEEP 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.
- 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.

- 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; Engineering & Enforcement Division; Bureau of Air Management; Department of Energy and Environmental Protection; 79 Elm Street, 5th Floor; Hartford, Connecticut 06106-5127.