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Affirmative Action/Equal Opportunity Employer

Mr. Michael Sullivan Facilities Manager Shell Oil Products US 481 East Shore Parkway New Haven, CT 06512

RE: Modification of Registration Nos. 117-0200-R and 117-0201-R for Volatile Liquid Storage Tanks 31 & 32 located at Shell Oil Products US, in New Haven, CT

Dear Mr. Sullivan:

The Commissioner of the Department of Energy and Environmental Protection (Department) may modify any license at the request of the licensee in accordance with Section 22a-3a-5(d) of the Regulations of Connecticut State Agencies (RCSA), and any other applicable law. Any modification at the request of the licensee shall comply with the requirements of RCSA Section 22a-3a-5(a).

As requested and supported in your letter dated December 5, 2018, the Bureau of Air Management Registration Nos. 117-0200-R and 117-0201-R are hereby modified unless within 30 days of issuance of this notice a request for hearing is filed. Such request shall conform with the provisions of RCSA Section 22a-3a-6(i). The registrations have been modified as follows:

Equipment Description	License No.	Material Being Stored	Capacity	Vapor Pressure
			(gallon)	(psi)
Aboveground Storage Tank 31	117-0200-R	Organic Liquid	1,528,800	< 11
Aboveground Storage Tank 32	117-0201-R	Organic Liquid	1,528,800	< 11

This letter in no way grants immunity from legal action resulting from the failure of this source to remain in compliance with existing air pollution regulations, nor does it provide an exemption from compliance with future Federal, State or local laws.

If you have any questions concerning this notice, please feel free to contact Ms. Rintra McIntyre of my staff at 860-424-3560.

Daté

Robert J. Klee Commissioner

**RJK:RPM** 

cc: Richard Rodrigue, Air Engineering

Keith Hill, Air Enforcement

(via electronic mail): Mr. Stephen Piper of MJ Bradley

Certified Mail

# Transferred To Equilon Enterprises on 12/13/17

### REGISTRATION CERTIFICATE EPAC-10 REV. 7-73



STATE OF CONNECTICUT

## DEPARTMENT OF ENVIRONMENTAL PROTECTION



EQUIPMENT CLASSIFICATION		STACK NO. 011	171005304
BURNING INCINERATOR	X PROCESS	AIR POLLUTION	REGISTRATION NO.
HUMBLE OIL & REFINING	*		DATE ISSUED
LOCATION OF EQUIPMENT (No. & Street, TOWN, Zip)	NEW HAVEN	NEW HAVEN CT 06503	12/03/13
COMMISSIONER OR HIS REPRESENTATIVE			

DEPARTMENT OF ENVIRONMENTAL PROTECTION

### MEMORANDUM

DATE:

December 10, 2018

TO:

Robert Klee, Commissioner

Tracy Babbidge, Bureau Chief

FROM:

Rintra McIntyre, APCE II

Susan Amarello, Supervising APCE Jaimeson Sinclair, Assistant Director

**SUBJECT:** 

Modification of Registration Nos. 117-0200-R and 117-0201-R for Volatile Liquid

Storage Tanks located at Shell Oil Products US, in New Haven, CT

DISCUSSION: Shell Oil Products US has submitted a letter, dated December 5, 2018, requesting to modify registrations associated with gasoline aboveground storage tanks 31 and 32. The request is a result of a minor modification application to the Title V permit submitted in November of 2017.

Proposed changes include:

Registration No. 117-0200-R for Tank 31

- 1. decrease the storage capacity from 1,700,000 gallons to 1,528,800 gallons; and
- 2. change the description of the material being stored from Exxon Extra Gasoline to organic liquid with vapor pressure less than 11 psi.

### Registration No. 117-0201-R for Tank 32

- 1. decrease the storage capacity from 1,690,000 gallons to 1,528,800 gallons; and
- 2. change the description of the material being stored from Exxon Extra Gasoline to organic liquid with vapor pressure less than 11 psi.

The proposed changes meet the definition of "modification" or "modified source" pursuant to RCSA Section 22a-174-1(73) whereby the proposed activities constitute a change in the method of operation. This change in the method of operation is to broaden the volatile organic material being stored resulting in any potential emissions not previously emitted. However, NSR permits are not required because the premises is not a major source of HAPs or the increase in potential emissions are less than 15 tpy pursuant to RCSA Sections 22a-174-3a(1)(C) and (E), respectively. Furthermore, modifications of registrations for other premises have been approved in the past pursuant to former RCSA Section 22a-174-2.

The proposed registration modifications are as follows:

Equipment Description	License No.	Material Being Stored	Capacity	Vapor Pressure
			(gallon)	(psi)
Aboveground Storage Tank 31	117-0200-R	Organic Liquid	1,528,800	< 11
Aboveground Storage Tank 32	117-0201-R	Organic Liquid	1,528,800	< 11

The compliance record was reviewed in accordance with the Environmental Compliance History Policy. Agency records, including the SIMS Enforcement database, were reviewed for information to evaluate the applicant's compliance history and the relevance of such history to the revocation being sought. Additionally, a review of air program compliance was requested from the Enforcement Section and that response forms a part of this record.

RECOMMENDATION: Based on the information submitted by the applicant, this engineering evaluation and the compliance history review, the modification of Registration Nos. 117-0200-R and 117-0201-R is recommended.

Rintra McIntyre, APCE II

12.31.2018

**REVIEW:** 

Susan Amarello

Supervising APCE

Jaimeson Sinclair

Assistant Director

12/3/19018

Date

Date