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	Waterfront Terminal, 428-500 Waterfront Street, New Haven, CT 06517
Equipment Description	Gasoline, Distillate, and Ethanol Truck Loading Rack
Collateral Conditions	Part VIII includes operational restrictions on Tank 123 and Tank 104.
Town-Permit Numbers	117-0241
Premises Number	88
Stack Number	16
Modification Issue Date	December 10, 2019
Prior Permit Issue Date(s)	September 14, 2010 (Minor Modification) September 6, 2005 (Minor Modification) April 13, 1999 (Operating Permit) January 1999 (Construction Permit)
Expiration Date	None

Tracy R. Babbidge for
Betsey C. Wingfield
Deputy Commissioner

December 10, 2019
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

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, distillate, and ethanol 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 equipped to load distillate products onto marine vessels from aboveground storage tanks and product pipeline connections to other terminals. 40 CFR Part 63 Subpart Y, National Emission Standards for Marine Tank Vessel Loading Operations, does not apply to Gulf Oil because the vapor pressure of distillate is less than applicable threshold (1.5 psia) and the terminal does not load gasoline products to marine vessels.

The terminal consists of a truck loading rack with eight loading bays. A Vapor Recovery Unit (VRU) System, currently consisting of a 10 mg/L primary VRU and a 10 mg/L back-up VRU, controls the emissions from the truck loading rack. A 2 mg/L VRU will later become the primary VRU replacing the 10 mg/L primary VRU; which will then become the back-up VRU. The current 10 mg/L back-up VRU will be decommissioned.

B. Equipment Design Specifications

Loading Rack with the capability to inject gasoline and distillate additives at the rack

C. Control Equipment Design Specifications

1. John Zink Vapor Recovery Unit (VRU) 2 mg/L System (New)
   a. Guaranteed Control Limitation: 2 mg of VOC per liter of gasoline loaded

2. John Zink VRU 10 mg/L System
   a. Guaranteed Control Limitation: 10 mg of VOC per liter of gasoline loaded
   b. Vacuum Assist System (Booster Blower)

3. John Zink VRU 10 mg/L System (Current Back-Up)
   a. Guaranteed Control Limitation: 10 mg of VOC per liter of gasoline loaded

4. John Zink PECS Vapor Combustion Unit (VCU) (Temporary)

a. Guaranteed Control Limitation: 10 mg of VOC per liter of gasoline loaded
b. Fuel: Propane

D. Stack Parameters

	2 mg/L VRU (New)	10 mg/L VRU	10 mg/L VRU (Current Back-Up)	Temporary VCU
Minimum Stack Height (ft)	10	14.7	17	35
Minimum Exhaust Gas Flow Rate (acfm)	1,162.66	1,162.66	321	850
Minimum Distance from the Stack to the Nearest Property Line (ft)	230	198	230	150

PART II. OPERATIONAL CONDITIONS

A. Equipment

Material Being Loaded: Gasoline, Distillate, Ethanol Products, and Associated Additives

B. Control Equipment

1. John Zink VRU 2 mg/L System (New)
   a. This 2 mg/L VRU shall be the primary control unit after it is installed and operational.
   b. Guaranteed Control Limitation: 2 mg of VOC per liter of gasoline loaded

2. John Zink VRU 10 mg/L System
   a. This 10 mg/L VRU shall be the primary control unit until the 2 mg/L VRU in Part II.B.1 of this permit is installed and operational.
   b. This 10 mg/L VRU shall be the back-up control unit after the 2 mg/L VRU in Part II.B.1 of this permit is installed and operational.
   c. Guaranteed Control Limitation: 10 mg/L of VOC per liter of gasoline loaded
   d. Vacuum Assist System (Booster Blower)

3. John Zink VRU 10 mg/L System (Current Back-Up)
   a. This 10 mg/L VRU shall be the back-up control unit until the 2 mg/L VRU in Part II.B.1 of this permit is installed and operational.
   b. This 10 mg/L VRU shall be decommissioned after the 2 mg/L VRU is installed and operational.
   c. Guaranteed Control Limitation: 10 mg/L of VOC per liter of gasoline loaded

4. John Zink PECS Vapor Combustion Unit (VCU) (Temporary)
   a. Guaranteed Control Limitation: 10 mg of VOC per liter of gasoline loaded
   b. Allowable Fuel: Propane

C. The Temporary VCU was approved to be operated via a permit minor modification (Application No. 201702513) effective March 15, 2017 and was operated from April 16, 2017 through April 28, 2017.

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 – Loading Rack

Source of VOC	mg VOC/L of Gasoline Loaded	VOC Emissions (tpy)	
		John Zinc VRU (Primary & Current Back-Up/Temp VCU)	John Zinc (New)
2 mg/L John Zink VRU (New)	2	A(13 mg/L) + ∑ (B(C) + D(E) + F(G))	
10 mg/L John Zink VRU (Primary & Current Back-Up)	10		
Temporary VCU	10		
Fugitive Emissions from Loading Cargo Tanks	13		
Total VOC		≤52.49	

where:

A = gasoline throughput (gallons)
B = new VRU throughput (gallons)
C = new VRU stack test results (mg/L)
D = current primary/future backup VRU throughput (gallons)
E = current primary/future backup VRU stack test results (mg/L)
F = current backup VRU throughput (gallons)
G = current backup VRU stack test results (mg/L)

B. Criteria Pollutants – Temporary VCU Fuel Combustion

Pollutant	April 16-28, 2017 (ton)
PM_{10}, SO_2	0.00
NO_x	0.33
CO	0.81
VOC	0.81

C. 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 RCSA Section 22a-174-29. [STATE ONLY REQUIREMENT]

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

- 2 mg/L VRU: Most recent DEEP approved stack test results
- Each 10 mg/L VRU: Most recent DEEP approved stack test results
- Temporary VCU: John Zinc Manufacturer's Specifications and National Emission Standards for Hazardous Air Pollutants, 40 CFR §63.422(b)

- Fugitive Emissions: National Emission Standards for Hazardous Air Pollutants, 40 CFR §63.420(a)(1)

E. 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, RECORD KEEPING AND REPORTING REQUIREMENTS

A. Monitoring

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 on the 2 mg/L VRU and each 10 mg/L VRU.

2. The 2 mg/L VRU, each 10 mg/L VRU, and temporary VCU 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. The Permittee shall operate the 2 mg/L VRU, each 10 mg/L VRU, and temporary VCU in accordance with all manufacturers' specifications and recommendations.

B. Record Keeping

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 keep a record of the dates the temporary VCU was in operation.

3. The Permittee shall keep a record of when the 2 mg/L VRU is installed and operational.

4. The Permittee shall keep a record of each date each 10 mg/L VRU is in operation.

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

6. The Permittee shall maintain daily records of VOC emissions and 365-day rolling total of the VOC emissions. The current day's VOC emissions shall be added to the previous year's 364 day's VOC emissions to obtain the 365-day rolling total of the VOC emissions.

7. 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.

C. Reporting

1. The Permittee shall submit a semiannual report to the commissioner and shall include in the report the following information:

   a. Each loading of a gasoline cargo tank for which vapor tightness documentation had not been previously obtained by the facility.
   b. The number of equipment leaks not repaired within five days after detection.

2. The Permittee shall notify the commissioner of the date(s) when the 2 mg/L VRU in Part II.B.1 of this permit is installed and operational. Such notification(s) shall be within 30 days of the subject event.

3. The Permittee shall submit an excess emissions report to the commissioner semiannually. [40 CFR §63.428(h)]

PART V. STACK EMISSION TEST REQUIREMENTS

A. Stack emission testing shall be performed in accordance with the Emission Test Guidelines available on the DEEP website at www.ct.gov/deep/stacktesting.

B. Initial stack testing of the 2 mg/L VRU shall be required within 90 days of the installation of such VRU for the following pollutant(s):

☐ PM ☐ PM_{10} ☐ $PM_{2.5}$ ☐ SO_2 ☐ NOx ☐ CO
☒ VOC ☐ Opacity ☒ Other (HAPs): TOCs

C. Recurrent stack testing of the 2 mg/L VRU shall be conducted within five years from the date of the previous stack test for the above pollutants.

D. Recurrent stack testing of each 10 mg/L VRU shall be conducted within five years from the date of the previous stack test for the above pollutants.

E. Stack test results shall be reported as follows: all pollutants in units of mg/L; HAPs in units of $\mu g/m^3$.

F. For testing being conducted pursuant to 40 CFR Part 60, the test report shall be submitted within 180 days after the initial startup date or within 60 days after reaching maximum production rate. [40 CFR §60.8(a)]

PART VI. OPERATION AND MAINTENANCE REQUIREMENTS

A. The Permittee shall operate and maintain this equipment in accordance with the manufacturer's specifications and written recommendations.

B. The Permittee shall properly operate the control equipment at all times that this equipment is in operation and emitting air pollutants.

C. The Permittee shall comply with all applicable sections of RCSA §22a-174-20(b) at all times.

PART VII. SPECIAL REQUIREMENTS

A. The Permittee shall comply with all applicable sections of the following New Source Performance Standard(s) at all times.

Title 40 CFR Part 60, Subpart XX and A

Copies of the Code of Federal Regulations (CFR) are available online at the U.S. Government Printing Office website.

B. The Permittee shall comply with all applicable sections of the following National Emission Standards for Hazardous Air Pollutants at all times.
Title 40 CFR Part 63, Subpart R and A

Copies of the Code of Federal Regulations (CFR) are available online at the U.S. Government Printing Office website.

C. Premises Emissions Summary

1. On January 1st of each calendar year, if the potential emissions of NOx 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 NOx and/or VOC emissions, as applicable, from the premises for such calendar year.
    b. Calculate and record annual NOx 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 NOx 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 VII.C.1 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.

D. 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]

E. 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 VIII. COLLATERAL CONDITIONS – TANK 123 and TANK 104

A. General Description – Tank 123

Gulf Oil's New Haven Terminal's Tank 123 is an aboveground storage vessel with the potential emissions of any individual air pollutant less than 15 tpy. Therefore, in accordance with RCSA §22a-174-3a(a), Gulf Oil is not required to obtain a permit to construct and operate Tank 123. Gulf Oil operates Tank 123 in accordance with the requirements in 40 CFR Part 60 Subpart Kb and A as well as 40 CFR Part 63 Subpart R and A.

B. Equipment Design Specifications – Tank 123

1. Tank Volume: 6,400,000 gallons

2. Tank Height: 56 feet

3. Tank Diameter: 140 feet

C. Control Equipment Design Specifications – Tank 123

Control Type: Fixed Roof in Combination with an Internal Floating Roof

D. Stack Parameters – Tank 123

1. Vent Height: 56 feet

2. Minimum Distance from Stack to Nearest Property Line: 240 feet

E. Equipment Operational Conditions – Tank 123

1. Material Stored: Gasoline or Distillate Products

2. Maximum Throughput: 450,000,000 gallons/year

3. Maximum Vapor Pressure of Volatile Organic Liquids: < 11 psia, < 568 mmHg

F. Allowable Emissions – Tank 123

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

1. Criteria Pollutants

Pollutant	tpy
VOC	3.33

2. 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 RCSA Section 22a-174-29. [STATE ONLY REQUIREMENT]

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

- EPA Tanks 4.09a or latest version of the tank program
- Material balance

4. 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.

G. General Description – Tank 104

Gulf Oil's New Haven Terminal's Tank 104 is an aboveground storage vessel and registered under Registration No. 117-0303-R. Gulf Oil operates Tank 104 in accordance with the requirements in 40 CFR Part 60 Subpart Kb and A as well as 40 CFR Part 63 Subpart R and A.

H. Equipment Design Specifications – Tank 104

1. Tank Volume: 592,220 gallons

2. Tank Height: 30 feet

3. Tank Diameter: 60 feet

I. Control Equipment Design Specifications – Tank 104

Control Type: Fixed Roof in Combination with an Internal Floating Roof

J. Stack Parameters – Tank 104

1. Vent Height: 30 feet

2. Minimum Distance from Stack to Nearest Property Line: 130 feet

K. Equipment Operational Conditions – Tank 104

1. Material Stored: Volatile Organic Liquids

2. Maximum Throughput: 75,000,000 gallons/year

3. Maximum Vapor Pressure of Volatile Organic Liquids: < 11 psia, < 568 mmHg

L. Allowable Emissions – Tank 104

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

1. Criteria Pollutants

Pollutant	tpy
VOC	1.56

2. 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 RCSA Section 22a-174-29. [STATE ONLY REQUIREMENT]

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

- EPA Tanks 4.09a or latest version of the tank program
- Material balance

4. 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.

M. Control Equipment Operational Conditions – Tank 123 and Tank 104

1. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. [40 CFR §60.112b(a)(1)(i)]

2. The internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof: [40 CFR §60.112b(a)(1)(ii)]

   a. A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

   b. Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.

   c. A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.

3. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the

liquid surface. [40 CFR §60.112b(a)(1)(iii)]

4. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. [40 CFR §60.112b(a)(1)(iv)]

5. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [40 CFR §60.112b(a)(1)(v)]

6. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. [40 CFR §60.112b(a)(1)(vi)]

7. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening. [40 CFR §60.112b(a)(1)(vii)]

8. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. [40 CFR §60.112b(a)(1)(viii)]

9. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover. [40 CFR §60.112b(a)(1)(ix)]

N. Monitoring, Record Keeping, and Reporting Requirements – Tank 123 and Tank 104

1. Monitoring

a. The Permittee shall visually inspect the floating roof deck, deck fittings and rim seal system through the roof hatches of the fixed roof once per month to determine compliance with the requirements of RCSA §22a-174-20(a)(2)(B). [RCSA §22a-174-20(a)(3)(A)]

b. The Permittee shall inspect the tank whenever the tank is emptied and degassed, but no less than once every 10 years, in accordance with RCSA §22a-174-20(a)(3).

c. The Permittee shall visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with volatile organic liquids. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel. [40 CFR §63.425(d), 40 CFR §60.113b(a)(1)]

d. The Permittee shall visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid

accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Commissioner in the inspection report required in Part VIII.N.3.c of this permit. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible. [40 CFR §63.425(d), 40 CFR §60.113b(a)(2)]

e. The Permittee shall visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes, and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in Part VIII.N.1.d of this permit.
[40 CFR §63.425(d), 40 CFR §60.113b(a)(4)]

f. The Permittee shall perform inspections of the control devices as recommended by the manufacturer.

2. Record Keeping

a. The Permittee shall keep records of the average monthly storage temperature, true vapor pressure, monthly fuel throughput and type of volatile organic compounds stored. [RCSA §22a-174-20(a)(10)]

b. The Permittee shall keep record of each inspection performed. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).
[40 CFR §63.428(d), 40 CFR §60.115b(a)(2)]

c. The Permittee shall keep readily accessible records showing the dimension of the storage tank and an analysis showing the capacity of the storage tank. These records shall be kept for the life of the tank.
[40 CFR §63.427(c), 40 CFR §60.116b(b)]

d. The Permittee shall maintain a record of the volatile organic liquid stored, the period of storage, and the maximum true vapor pressure of that volatile organic liquid during the respective storage period. [40 CFR §63.427(c), 40 CFR §60.116b(c)]

e. The Permittee shall keep records of annual fuel throughput. Annual fuel throughput shall be based on any consecutive 12 month time period and shall be determined by

adding the current month's fuel throughput to that of the previous 11 months. The Permittee shall make these calculations monthly.

f. 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 each pollutant. The Permittee shall make these calculations within 30 days of the end of the previous month.

g. The Permittee shall keep material safety data sheets (MSDS) or technical data sheets (TDS) or Safety Data Sheets (SDS) for each chemical or solvent used. Such information shall include the quantity and type of each hazardous air pollutant contained in the paint or solvent. For paperwork reduction, these sheets may be kept on computer file in electronic form, access to above paperwork requirement may also be allowed via internet on-demand.

h. 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.

3. Reporting

a. The Permittee shall notify the commissioner in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by Parts VIII.N.1.c & e of this permit to afford the commissioner the opportunity to have an observer present. If the inspection required by Part VIII.N.1.e of this permit is not planned and the owner or operator could not have known about the inspection 30 days in advance or refilling the tank, the owner or operator shall notify the commissioner at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the commissioner at least 7 days prior to the refilling. [40 CFR §63.425(d), 40 CFR §60.113b(a)(5)]

b. The Permittee shall furnish the commissioner with a report that describes the control equipment and certifies that the control equipment meets the specifications of Part VIII.M and Part VIII.N.1.c of this permit. This report shall be an attachment to the notification required by 40 CFR §60.7(a)(3).
[40 CFR §63.428(d), 40 CFR §60.115b(a)(1)]

c. If any of the conditions described in Part VIII.N.1.d of this permit are detected during the annual visual inspection required by Part VIII.N.1.d of this permit, a report shall be furnished to the commissioner within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.
[40 CFR §63.428(d), 40 CFR §60.115b(a)(3)]

O. Operation and Maintenance Requirements – Tank 123 and Tank 104

1. The Permittee shall ensure that all tank gauging or sampling devices are gas-tight except when tank gauging or sampling is taking place. [RCSA §22a-174-20(a)(2)(A)]

2. The Permittee shall ensure that there are no visible holes, tears or other openings in the seal or any seal fabric or materials. [RCSA §22a-174-20(a)(8)(A)]

3. The Permittee shall ensure that all openings except stub drains are equipped with covers, lids, or seals such that:

   a. the cover, lid or seal is in the closed position at all times except in actual use; and
   b. automatic bleeder vents are closed at all times; and
   c. rim vents, if provided, are set to open at the manufacturer's recommended setting. [RCSA §22a-174-20(a)(8)(B)]

4. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface. [40 CFR §60.112b(a)(1)(C)(iii)]

5. Each opening in the internal floating roof except for automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. [40 CFR §60.112b(a)(1)(C)(iv)]

6. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating. [40 CFR §60.112b(a)(1)(C)(v)]

7. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. [40 CFR §60.112b(a)(1)(C)(vi)]

8. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening. [40 CFR §60.112b(a)(1)(C)(vii)]

9. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. [40 CFR §60.112b(a)(1)(C)(viii)]

10. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover. [40 CFR §60.112b(a)(1)(C)(ix)]

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