



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Pages 2 through 13 are hereby incorporated by reference into this permit

ORIGINAL

Town No. 117	Premise No. 88	Permit No. 0243	Stack No. 13
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Equipment Classification <input type="checkbox"/> Fuel Burning <input type="checkbox"/> Incinerator <input checked="" type="checkbox"/> Process Mfg. Other _____	Date Issued 10/30/98	Expiration Date (none unless noted)
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PERMIT TO: Construct Operate Other _____

FEDERAL REQUIREMENTS:

NSPS (40 CFR PART 60) Subpart _____

NESHAP (40 CFR PART 61) Subpart _____

MACT (40 CFR PART 63) Subpart R

OZONE NON-ATTAINMENT STATUS:

Severe (Major Source if VOC or NOx > 25 TPY)

Serious (Major Source if VOC or NOx > 50 TPY)

TYPE OF POLLUTANT FOR WHICH A PREMISE IS A "MAJOR SOURCE":

SOx NOx CO TSP VOC PM-10

SOURCE CLASS:

New Source Minor Modification Major Modification Aggregate

Equipment Description
STORAGE TANK #113

Location of Equipment (No. & Street, Town, Zip)
500 WATERFRONT STREET, NEW HAVEN, CONNECTICUT 06517

Firm Name
GULF OIL LIMITED PARTNERSHIP, NEW HAVEN TERMINAL



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EQUIPMENT DESCRIPTION (I.D.): STORAGE TANK #113

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 is 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 marine vessel loading operations.

This permit allows tank #113 to store both gasoline and distillate products.

B. Equipment Design Specifications

Bulk Aboveground Storage Tank #113

Tank Dimensions

Tank Height: 48 Ft
Diameter (ft): 120.0
Volume (gals): 4,030,908

Records indicating continual compliance with all above conditions must be kept on site at all times and made available upon Departmental request for the duration of this permit.

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Arthur J. Rocque, Jr., Commissioner, or Designated Agent



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EQUIPMENT DESCRIPTION (I.D.): STORAGE TANK #113

PART I. PROCESS DESCRIPTION, CONTINUED

Rim-Seal System

Primary Seal: Mechanical Shoe

Secondary Seal: Yes

Deck type: Bolted

C. Control Equipment Specifications

Permanently Affixed Roof in Combination with a Mechanical Shoe Seal [§ 63.423(a); § 60.112b(a)(1)]

Design Specification

Design in accordance with the requirements in 40 CFR § 60.112b(a)(1) except for the requirements in § 60.112b(a)(1)(iv) through (ix). [§63.423(a)]

Deck Characteristics

Construction: Cont. Sheet 5 Feet wide

Deck Seam Len. (Ft): 2262

D. Stack Parameters

Tank Height: 48 Ft

Minimum Distance From Vent To Closest Property Line: 21.3 Feet

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PART II. OPERATING REQUIREMENTS

Notwithstanding the design specifications or description provided in Part I, above, the permittee shall comply with the following operating requirements.

A. Operating Parameter Limitations

Material Being Stored: Gasoline and Distillate Products
 Vapor Pressure of volatile organic liquids (VOL) Being Stored: < 11 psia (568 mm Hg) under actual storage conditions [22a-174-20(a)(2)(D)]
 Capacity of Tank: 4,030,908 gals
 Maximum Throughput: 677,532,280 gal/yr
 Storage Temperature: Avg. 60 °F
 Additives: Gasoline additives with varying concentration

B. Operating & Maintenance Requirements

1. All tank gauging or sampling devices must be gas-tight except when tank gauging or sampling is taking place. [22a-174-20(a)(2)(D)]
2. The permittee shall ensure that any seal is intact and uniformly in place around the circumference of the floating roof between the floating roof and the tank wall. [22a-174-20(a)(2)(D)(i)]
3. The permittee shall ensure that there are no visible holes, tears or other openings in the seal or any seal fabric or materials. [22a-174-20(a)(8)(A)]
4. All openings except stub drains shall be equipped with covers, lids or seals such that the cover, lid or seal is in the closed position at all times except in actual use. [22a-174-20(a)(8)(B)(i)]
5. Routine inspections shall be conducted through roof hatches once per month. [22a-174-20(a)(8)(C)]

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PART II. OPERATING REQUIREMENTS, CONTINUED

- 6. A complete inspection of cover and seal shall be conducted whenever the "tank" is emptied for non-operational reasons but in any event at least once per year. [22a-174-20(a)(8)(D)]

C. Emission Limits

1. Criteria Pollutants

The source shall not exceed the emission limits stated herein over any consecutive twelve (12) months.

<u>Pollutants</u>	<u>TPY</u>
VOC	10.61

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

- a. Tanks Program, Version 3.0

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.

2. Hazardous Air Pollutants

The source shall not exceed the emission limits stated herein at any time.

<u>Pollutants</u>	<u>HLV (ug/m³)</u>	<u>lb/hr</u>	<u>TPY</u>	<u>MASC (ug/m³)</u>
Benzene	150	0.3151	1.38	173.68
Toluene	7,500	0.0731	0.32	8683.86
Naphthalene	1,000	0.4840	2.12	1157.85

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PART II. OPERATING REQUIREMENTS, CONTINUED

Pollutants	HLV (ug/m ³)	lb/hr	TPY	MASC (ug/m ³)
Xylenes	8,680	0.0731	0.32	10050.13
Ethyl Benzene	8,700	0.0731	0.32	10073.28
MTBE		0.3630	1.59	N/A

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

- a. Material Balance

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

Not Applicable.

PART IV. MONITORING, RECORD KEEPING AND REPORTING REQUIREMENTS

A. Monitoring Requirements

1. The permittee shall keep readily accessible records showing the dimension of the storage tank and an analysis showing the capacity of the storage tank. [§ 63.427(c); § 60.116b(b)]
2. The permittee shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. [§ 63.427(c); § 60.116b(c)]
3. A visual inspection of the secondary closure seal shall be conducted semi-annually. [22a-174-20(a)(2)(D)(iv)]
4. Any emergency roof drain shall be provided with a slotted fabric cover which covers at least ninety percent (90%) of the area opening. [22a-174-20(a)(2)(D)(v)]

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PART IV. MONITORING, RECORD KEEPING AND REPORTING REQUIREMENTS, CONTINUED

B. Continuous Emission Monitoring

CEM shall be required for the following pollutant/operational parameters and enforced on the following basis:

None at this time

C. Record Keeping Requirements

1. The permittee shall keep readily accessible records showing the dimension of the storage tank and an analysis showing the capacity of the storage tank.[§ 63.427(c); § 60.116b(b)] These records shall be kept for the life of the storage tank.
2. Records of the results of all the inspections conducted shall be maintained and kept for a minimum of five (5) years after such record is made.[§ 63.427(c); 22a-174-20(a)(8)(F)]
3. Records of the average monthly storage temperature, true vapor pressure, monthly throughput and type of volatile organic compounds stored shall be maintained and kept for a minimum of five (5) years after such record is made. [§ 63.427(c); 22a-174-20(a)(8)(E)]
4. The permittee shall keep copies of all other records for at least five (5) years.[§ 63.427(c); § 60.116b(a)]

D. Reporting Requirements

1. After installing control equipment, the permittee shall furnish the Department of Environmental Protection, Air Bureau (the Department) with a report that describes the control equipment and certifies that the control equipment meets the design specifications given in Part I.C. of this permit. This report shall be an attachment to the notification of the actual date of initial startup postmarked within 15 days after such date. [§ 63.428(d); § 60.115b(a)(1); § 60.7(a)(3)]

Records indicating continual compliance with all above conditions must be kept on site at all times and made available upon Departmental request for the duration of this permit.

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PART IV. MONITORING, RECORD KEEPING AND REPORTING REQUIREMENTS, CONTINUED

- The permittee shall keep records of each inspection performed as required by Part IV.E of this permit. Each record shall identify the storage tank on which the inspection was performed and shall contain the date the tank was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings). [§ 63.428(d); § 60.115b(a)(2)]
- If any of the conditions described in Part IV.E.2 of this permit are detected during the annual visual inspection required by Part IV.E.2 of this permit, a report shall be furnished to the Department within 30 days of the inspection by the permittee. Each report shall identify the storage tank, the nature of the defects, and the date the storage tank was emptied or the nature of and date the repair was made. [§ 63.428(d); § 60.115b(a)(3)]

E. Testing and Procedures

- After installing the control equipment (permanently affixed roof and internal floating roof), 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 tank with VOL. 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 tank. [§ 63.425(d); § 60.113b(a)(1)]
- 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 tank, 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 tank from service within 45 days. If a failure that is detected during the inspections 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 Department in the inspection report required in Part IV.D.3 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. [§ 63.425(d); § 60.113b(a)(2)]

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PART IV. MONITORING, RECORD KEEPING AND REPORTING REQUIREMENTS, CONTINUED

3. 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 permittee 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 DEP in the inspection report required in Part IV.D.3 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. [§ 63.425(d); § 60.113b(a)(2)]
4. Notify the Department in writing at least 30 days prior to the filling or refilling of the storage tank to afford the Department the opportunity to have an observer present. If the inspection required by Part IV.E.3 of this permit is not planned and the permittee could not have known about the inspection 30 days in advance or refilling the tank, the permittee shall notify the Department at least 7 days prior to the refilling of the storage tank. 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 Department at least 7 days prior to the refilling.

PART V. DEMONSTRATION OF COMPLIANCE

A. Demonstration of compliance with the total area of gaps

1. Compliance with the requirements regarding the total area of gaps shall be determined by physically measuring the length and width of all gaps around the entire circumference of the secondary seal in each place where a 0.32 CM (1/8 IN.) uniform diameter probe passes freely (without forcing or binding against the seal) between the seal and the tank wall and summing the area of the individual gaps.

Any person who proposes to conduct this test shall notify the Department's Stack Testing Unit not less than thirty (30) days before the test so the Department may, at its option, observe the test.[22a-174-20(a)(9)]

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PART V. DEMONSTRATION OF COMPLIANCE, CONTINUED

2. The permittee shall ensure that the total area of gaps, determined in accordance with the Part V.A.1 of this permit, exceeding 0.125 inches in width between the secondary closure seal and the tank wall does not exceed 1.0 square inch per foot of tank diameter. [22a-174-20(a)(2)(D)(ii)]
3. A secondary closure seal gap measurement as specified in Part V.A.2 of this permit shall be made annually. [22a-174-20(a)(2)(D)(iii)]

B. Demonstration of compliance with the maximum true vapor pressure

If available data on the storage temperature will be used to determine the maximum true vapor pressure, then the permittee shall use the following method:

1. For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.
2. For crude oil or refined petroleum products the vapor pressure may be obtained by the following:
 - I. Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from nomograph contained in API Bulletin 2517 (incorporated by reference-see § 60.17), unless the Administrator specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).
 - ii. The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa (2.00 psia) or with physical properties that preclude determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 3.5 kPa (0.508 psia).

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PART V. DEMONSTRATION OF COMPLIANCE, CONTINUED

3. For other liquids, the vapor pressure may be obtained from standard reference texts, or
- I. Determined by ASTM Method D2879-83 (incorporated by reference-see § 60.17); or
 - ii. Measured by an appropriate method approved by the Administrator (EPA); or
 - iii. Calculated by an appropriate method approved by the Administrator (EPA). [§ 60.116b(e)]

C. Demonstration of compliance with the Hazardous Air Pollutant MASC

1. The permittee shall demonstrate that the hazardous air pollutant's actual stack concentration does not exceed the maximum allowable stack concentration (MASC) using the equation given in Section 22a-174-29 of the RCSA.

PART VI. PREMISE REQUIREMENTS

- A. Operation of this equipment as described in this permit 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 premise that constitutes a nuisance as defined under Section 22a-174-23 of the Regulations. Failure to comply with this requirements may results in the assessment of civil penalties and/or the issuance of a State Order.
- B. At all times, operation of this facility shall be carried out in a manner so as not to violate or contribute significantly to the violation of any applicable state noise control regulations under Section 22a-69-1 through 7.4 of Connecticut Department of Environmental Protection Control of Noise Regulations.
- C. The subject premise shall operate in compliance with fugitive dust regulations in Section 22a-174-18 of the Regulations.
- D. The permittee is prohibited from conducting open burning, except as may be allowed by Section 22a-174-17(a) through (g) inclusive.

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PART VI. PREMISE REQUIREMENTS, CONTINUED

- E. The permittee shall cover all open drums and vessels that contain solvents, cleaners, coatings, or cleaning rags so as to minimize the amount of VOCs emitted to the atmosphere.
- F. The permittee shall comply with any requirements agreed to for eliminating or reducing the amount and toxicity of potentially harmful substances at their subject premise, by not generating these substances in the first place.
- G. The permittee shall comply with any pollutant specific emission cap assigned to the subject premise in this subsection.

PART VII. 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.
- E. Any document, including any notice, which is required to be submitted to the Commission 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

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EQUIPMENT DESCRIPTION (I.D.): STORAGE TANK #113

PART VII. ADDITIONAL TERMS AND CONDITIONS, CONTINUED

familiar with the information submitted in the documents and all attachments and 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, and I understand that any false statement made in this document or its attachments may be punishable as a criminal offense." Any false statement in any information submitted pursuant to this permit may be punishable as a criminal offense in accordance with Connecticut General Statutes §22a-6, under §53a-157 of the Connecticut General Statutes.

- 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 fifteen days of the date of 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 Assistant Director; Engineering & Enforcement; Bureau of Air Management; Department of Environmental Protection; 79 Elm Street, 5th Floor; Hartford, Connecticut 06106-5127.

Records indicating continual compliance with all above conditions must be kept on site at all times and made available upon Departmental request for the duration of this permit.

Firm Name GULF OIL LIMITED PARTNERSHIP, NEW HAVEN TERMINAL
Location of Equipment (No. & Street, Town, Zip) 500 WATERFRONT STREET, NEW HAVEN, CONNECTICUT 06517