



III. Corrective Action	<p>If the system is shutdown, the system is reset. If the problem persists or another issue arises that needs corrective action the following steps are followed.</p> <ul style="list-style-type: none"> (i) Initiate corrective action to determine the cause of the problem within 1 hour; (ii) Initiate corrective action to fix the problem within 24 hours; (iii) Complete all corrective actions needed to fix the problem as soon as practicable consistent with good air pollution control practices for minimizing emissions; (iv) Minimize periods of start-up, shutdown, or malfunction; and (v) Take any necessary corrective actions to restore normal operation and prevent the recurrence of the cause of the problem.
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IV. Performance Criteria	
Data Representativeness	Monitoring is conducted on a continuous basis during loading. Systems are maintained and checked on a semiannual basis by a qualified contractor.
Verification of Operational Status	An indicator lamp on the VCU control panel is lit when UFD detects presence of flame in VCU. This tells operators the system is operating normally.
QA/QC Practices	<ul style="list-style-type: none"> • Preventative maintenance (PM) of VCU and UFD performed on at least a semiannual basis. • UFD calibration verified during the PM check. Output signal from UFD measured directly with plug-in module provided by UFD vendor. • Terminal staff performs daily checks when operational to verify operational status of VCU and adherence to system performance criteria. These daily inspections include visual verification that VCU flame is on during product loading cycles. Terminal staff completes the daily VCU monitoring checklist included as Attachment 1. • Compliance testing of VCU emissions in accordance with Permit.



	<ul style="list-style-type: none"> Compliance testing includes demonstration that VOC emissions are below permit limit (mg VOC/liter product loaded) and that UFD verifies flame presence at all times that product is loading.
Monitoring Frequency	The systems are monitored continuously during loading operations.
Data Collection Procedures	UFD continuously senses UV radiation emitted by flame and transducers continuously monitor system pressures. These signals are measured as a current (micro amps) and sent to terminal PLC.

Glossary of Terms	
Acronym	Definition
VCU	Vapor Combustion Unit
VOC	Volatile Organic Compounds
TYP	Tons Per Year
PTE	Potential to Emit
UFD	Ultraviolet Flame Detector
PLC	Programmable Logic Controller
QIP	Quality Improvement Plan

ATTACHMENT 1



August 2019

VCU Compliance Assurance Monitoring Plan Marine Loading Rack VCUs

Background	
Facility Name	Global Companies LLC – Albany, NY Terminal
Street Address	50 Church Street, Port of Albany
City/Town/State	Albany, NY
Zip Code	12202

Source Information	
Date Plan Submitted (mo/day/yr)	08/30/19
Permit No. / Source ID No.	4-0101-00112/00029/1-RACK3
Regulated Pollutant	VOC
CAS No.	0NY998-00-0
Emission Limit	VCUM2 - 2 mg/l VCUM1 – 10 mg/l

Submittal Type
MARK THE APPROPRIATE BOX BELOW AS TO WHY THIS PLAN IS BEING SUBMITTED.
<input type="checkbox"/> Initial Submittal: Only Gasoline Terminals subject to 40 CFR 63 Subpart BBBBBB <u>National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities, 63.11092(b)(1)(iii)(B)(2)</u>
<input type="checkbox"/> Renewal Application.
<input checked="" type="checkbox"/> Significant Modification to Control System. In August 2019, the Compliance Assurance Monitoring (CAM) Plan was updated to reflect current facility operations.
<input type="checkbox"/> Ownership Transfer



CAM Applicability Determination

Does the source have a Pollutant Specific Emissions Unit (PSEU) that is subject to CAM, 40 CFR part 64, which must be addressed in a CAM plan submittal? To determine applicability, a PSEU must meet all of the following criteria (if no, then the remainder of this form need not be completed):

YES NO

- A. The PSEU is located at a major source that is required to obtain a Title V Permit:
- B. The PSEU is subject to an emission limitation or standard for the applicable regulated air pollutant that is not exempt:

List of exempt emission limitations or standards:

- NSPS (40 CFR part 60) or NESHAP (40 CFR parts 61 and 63) proposed after 11/15/1990.
 - Stratospheric ozone protection requirements.
 - Acid rain program requirements.
 - Emission limitations or standards for which a Title V Permit specifies a continuous compliance determination method, as defined in the CAM rule.
 - An emission cap that meets the requirements specified in 40 CFR 70.4(b)(12).
- C. The PSEU uses an add-on control device to achieve compliance with an emission limitation or standard.
- D. The PSEU has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than major source threshold levels.

Note: A Continuous Parameter Monitoring System (CPMS) which monitors temperature is used as the continuous monitoring parameter for this CAM. Instantaneous and 1-hour average temperatures are monitored and recorded.

During periods of CPMS downtime, the parameters specified in the CAM Plan below shall be monitored.



Control Technology Description

VCU ID No.	<u>1-RACK3</u> VCUM1 and VCUM2
VCU Type	<u>John Zink Vapor Combustion Unit, Model # ZCM-2-6-35-X-2/8-FLANGE</u>

The major components of a **Vapor Combustion Unit (VCU)** are shown in Figure 1. Normal operation of the VCU typically consists of stack purge, pilot ignition, normal operation, normal shutdown and fault-related shutdown steps. The marine vapor control system (MVCS) is also equipped with a Dock Safety Unit (DSU). The DSU consists of a loading line with an oxygen analyzer and enriching injection line.

When either a local or remote start signal is received by the VCU, the assist air blower starts and purges the stack to help ensure that a flammable mixture is not present. After the purge is complete, the pilot ignites and must be confirmed by the flame monitor in order for the operation to proceed.

Once the pilot is confirmed, the system is ready for normal operation, and provides a "permissive" signal to the marine transfer system that loading may begin.

The assist air blower provides a portion of the combustion air and mixing energy to ensure smokeless combustion of the vapors.

When the start signal is removed, the system begins a normal shutdown. The vapor shutdown valves and fuel gas shutdown valves close, and the pilot is extinguished. In addition, the assist gas control valve closes, the quench air damper opens and the assist air blower stops.

If an unsafe condition, such as loss of pilot or assist air blower failure, is detected during operation, the system immediately initiates an annunciated fault-related shutdown, which results in the same system status as described for the normal shutdown. The system cannot be restarted until the fault is corrected and the system is reset.

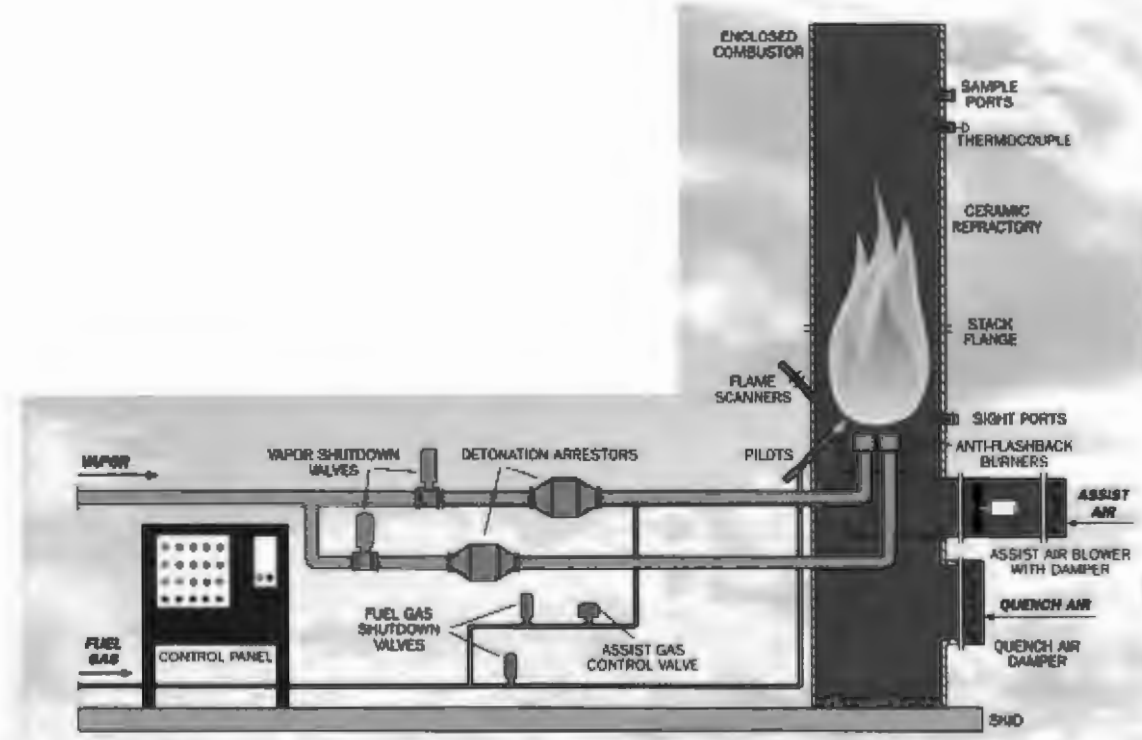


Figure 1. Vapor Combustion Unit (VCU) – System Schematic



Major / Non-Major Source Determination*	
VOC Potential to Emit (TPY) Post Control	<50
Major Source Thresholds (TPY)	50
VOC PTE (TPY)	<input checked="" type="checkbox"/> less than <input type="checkbox"/> greater than major source threshold
* Non major or small units are those with a pre-control device potential to emit greater than the major source thresholds, but post-control device potential to emit less than the major source thresholds. Major or large units are those with a pre-control device and post-control device potential to emit greater than the major source thresholds.	
CAM Plan	
I. General Criteria	
Indicators	Presence of Pilot Flame
Monitoring Approach	<ul style="list-style-type: none"> • Ultraviolet Flame Detector (UFD) monitors presence of flame on a continuous basis and generates an electric signal. • After a vessel is connected at the dock, a remote signal is sent to the VCU programmable logic controller (PLC) to automatically ignite the pilot flame. The PLC will shut down the combustion system due to pilot failure. After the UFD verifies that a flame is present and other systems are operational, it sends a permissive signal to the loading rack allowing loading to proceed. If the UFD signal is lost during loading or other system components are not operational or within system parameters, the loading rack automatically shuts down and the VCU alarm sounds at the loading rack. • Preventative maintenance (PM) of VCU and UFD performed on at least a semiannual basis. • Terminal staff also complete the monitoring form, included as Attachment 1, once during a marine loading event.



Glossary of Terms

Acronym	Definition
VCU	Vapor Combustion Unit
VOC	Volatile Organic Compounds
TYP	Tons Per Year
PTE	Potential to Emit
UFD	Ultraviolet Flame Detector
PLC	Programmable Logic Controller
QIP	Quality Improvement Plan

Attachment 1

Attachment XXIX

Renewable Diesel Letter and SDSs



349 Northern Blvd. Suite 3
Albany, NY 12204
Phone: 518.453.2203
Fax: 518.453.2204
www.envirospeceng.com

Don Welsted
NYSDEC Region 4, Division of Air Resources
1130 North Westcott Road
Schenectady NY, 12306

Mr. Don Welsted,

In April 2023, the New York State Department of Environmental Protection granted approval for Global Companies LLC (Global) to store Renewable Diesel at its Albany, NY Terminal. As further described below, the approval was based on the determination that Renewable Diesel is exempt from permitting under the applicable air regulations. At the request of NYSDEC, Global is providing this follow-up communication to summarize discussions and e-mail correspondence on the issue.

Renewable Diesel is a drop-in replacement for standard diesel. It has the same characteristics as petroleum diesel fuel and must meet ASTM D975-21 Standard Specification for Diesel Fuel (ASTM Grades 1-D or 2-D) to be sold as a motor fuel. According to the US Department of Energy Alternative Fuels Data Center, *“Renewable diesel is a fuel made from fats and oils, such as soybean oil or canola oil, and is processed to be chemically the same as petroleum diesel. It meets the ASTM D975 specification for petroleum in the United States and EN 590 in Europe. Renewable diesel can be used as a replacement fuel or blended with any amount of petroleum diesel”*¹

Review of relevant regulations indicate that the Renewable Diesel meets the definition of a distillate oil under Chapter 200 (Definitions):

6 CRR-NY 200.1(r) - Distillate oil - A fuel oil consisting of distilled fractions and having a kinematic viscosity of 5.8 centistokes or less at 100 degrees Fahrenheit. This includes ASTM grade numbers 1 and 2 fuel oil, ASTM grade numbers 1-D and 2-D diesel fuel oil and proposed ASTM grade numbers 1-GT and 2-GT gas turbine fuel oil. Since Renewable Diesel is a Distillate Oil, it is considered an exempt activity under Chapter 201-3.2 (Exempt activities) since the product will be stored in existing distillate tanks that are < 300,000 barrels capacity.

6 CRR-NY 201-3.2(c)(21) - Distillate fuel oil, residual fuel oil, and biodiesel storage tanks with storage capacities below 300,000 barrels.

Should you have any questions please feel free to contact me at 518-453-2203 or Tom Keefe of Global at (781) 398-4132.

Sincerely,

Gianna Aiezza

Gianna Aiezza, PE
Principal Engineer
Envirospec Engineering, PLLC

cc: Tom Keefe, Global

¹ https://afdc.energy.gov/fuels/renewable_diesel.html



SAFETY DATA SHEET

NEXBTL Renewable Diesel; Neste 100 % NEXBTL -diesel; Neste Green 100 -diesel

1. Identification

Product identifier

Product name NEXBTL Renewable Diesel; Neste 100 % NEXBTL -diesel; Neste Green 100 -diesel

Product number ID 15783.

Recommended use of the chemical and restrictions on use

Application Use as a fuel

Details of the supplier of the safety data sheet

Supplier Neste Singapore Pte Ltd
1 Tuas Soth Lane, Singapore 637301, SINGAPORE
+65 6223 1222
SDS@neste.com (chemical safety)

Emergency telephone number

National emergency telephone number +358-9-471 977, +358-9-4711, Poison Information Centre/HUS, P.O.B 340 (Tukholmankatu 17) 00029 HUS (Helsinki, Finland)

2. Hazard(s) identification

Classification of the substance or mixture

Physical hazards Flam. Liq. 4 - H227

Health hazards Asp. Tox. 1 - H304

Environmental hazards Not Classified

Label elements

Pictogram



Signal word Danger

Hazard statements H227 Combustible liquid.
H304 May be fatal if swallowed and enters airways.

Precautionary statements P210 Keep away from heat, sparks, open flames and hot surfaces. No smoking.
P301+P310 If swallowed: Immediately call a poison center/doctor.
P331 Do NOT induce vomiting.
P501 Dispose of contents/container in accordance with national regulations.

Contains Alkanes, C10-20 -branched and linear

Other hazards

Other hazards Risk of soil and ground water contamination.,Repeated exposure may cause skin dryness or cracking.

NEXBTL Renewable Diesel; Neste 100 % NEXBTL -diesel; Neste Green 100 -diesel

3. Composition/information on ingredients

Mixtures

Alkanes, C10-20 -branched and linear	ca. 100%
CAS number: 928771-01-1	
Classification	
Flam. Liq. 4 - H227	
Asp. Tox. 1 - H304	

The Full Text for all Hazard Statements are Displayed in Section 16.

Other information Mixture of renewable raw material fuel and additives., Contains middle distillate-range iso- and n-paraffinic hydrocarbons., Total aromatics at maximum 1,0 Weight %., Identity inside the EU: Renewable hydrocarbons (diesel type fraction); REACH Registration Nr: 01-2119450077-42-0001.

4. First-aid measures

Description of first aid measures

Inhalation	Unlikely to be hazardous by inhalation because of the low vapor pressure of the product at ambient temperature. If spray/mist has been inhaled, proceed as follows. Remove victim to fresh air and keep at rest in a position comfortable for breathing. Get medical attention if symptoms are severe or persist.
Ingestion	Do not induce vomiting. Get medical attention immediately.
Skin Contact	Remove contaminated clothing immediately and wash skin with soap and water. Get medical attention if irritation persists after washing.
Eye contact	Rinse immediately with plenty of water. Remove contact lenses, if present and easy to do. Continue rinsing. Get medical attention if irritation persists after washing.

Most important symptoms and effects, both acute and delayed

General information Repeated exposure may cause skin dryness or cracking. Spray/mists may cause respiratory tract irritation. Entry into the lungs following ingestion or vomiting may cause chemical pneumonitis.

Indication of immediate medical attention and special treatment needed

Notes for the doctor Treat symptomatically.

5. Fire-fighting measures

Extinguishing media

Suitable extinguishing media Water spray, foam, dry powder or carbon dioxide.

Unsuitable extinguishing media Water may be ineffective for extinguishment, unless used under favorable conditions by experienced fire fighters.

Special hazards arising from the substance or mixture

Specific hazards Combustible liquid. Containers can burst violently or explode when heated, due to excessive pressure build-up.

Hazardous combustion products Carbon dioxide (CO₂). Carbon monoxide (CO).

NEXBTL Renewable Diesel; Neste 100 % NEXBTL -diesel; Neste Green 100 -diesel

Advice for firefighters

Protective actions during firefighting	Cool containers exposed to heat with water spray and remove them from the fire area if it can be done without risk.
Special protective equipment for firefighters	Wear positive-pressure self-contained breathing apparatus (SCBA) and appropriate protective clothing.

6. Accidental release measures

Personal precautions, protective equipment and emergency procedures

Personal precautions	Wear adequate protective equipment at all operations.
For emergency responders	Prevent unauthorized access. Eliminate all ignition sources if safe to do so. Take precautionary measures against static discharge.

Environmental precautions

Environmental precautions	Avoid release to the environment. Stop leak if safe to do so. Avoid the spillage or runoff entering drains, sewers or watercourses. Inform the relevant authorities if environmental pollution occurs (sewers, waterways, soil or air). Risk of soil and ground water contamination.
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Methods and material for containment and cleaning up

Methods for cleaning up	Immediately start clean-up of the liquid and contaminated soil. Contain spillage with sand, earth or other suitable non-combustible material. Pay attention to the fire and health hazards caused by the product.
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Reference to other sections	For personal protection, see Section 8.
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7. Handling and storage

Precautions for safe handling

Usage precautions	Avoid heat, flames and other sources of ignition. Take precautionary measures against static discharges. All handling should only take place in well-ventilated areas. Avoid inhalation of vapors and contact with skin and eyes. Use personal protective equipment and/or local ventilation when needed. Do not eat, drink or smoke when using this product. Wash hands and any other contaminated areas of the body with soap and water before leaving the work site. During tank operations follow special instructions (risk of oxygen displacement and hydrocarbons).
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Conditions for safe storage, including any incompatibilities

Storage precautions	Flammable liquid storage. Store in accordance with local regulations. Store in a demarcated banded area to prevent release to drains and/or watercourses. Take precautions against leakage by constructing collecting pools and sewerage systems as well as by surfacing the loading and unloading stations. Only store in correctly labeled containers. Use containers made of the following materials: Carbon steel. Stainless steel.
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Specific end uses(s)

Specific end use(s)	Not known.
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NEXBTL Renewable Diesel; Neste 100 % NEXBTL -diesel; Neste Green 100 -diesel

8. Exposure Controls/personal protection

Ingredient comments	The individual limit values can be applied for the hydrocarbons. Diesel fuel as total hydrocarbons; ACGIH TLV®-TWA (8h) 100 mg/m ³ (IFV).
Exposure controls	
Appropriate engineering controls	All handling should only take place in well-ventilated areas. Use personal protective equipment and/or local ventilation when needed. Handle in accordance with good industrial hygiene and safety practice. During tank operations follow special instructions (risk of oxygen displacement and hydrocarbons).
Eye/face protection	Tight-fitting safety glasses.
Hand protection	Wear protective gloves. It is recommended that gloves are made of the following material: Nitrile rubber. Neoprene. Polyvinyl chloride (PVC). The selected gloves should have a breakthrough time of at least 4 hours. Protection class 5. Change protective gloves regularly.
Other skin and body protection	Wear suitable protective clothing as protection against splashing or contamination. Wear anti-static protective clothing if there is a risk of ignition from static electricity.
Respiratory protection	Filter device/half mask Combination filter, type A2/P2. Filter device could be used maximum 2 hours at a time. Filter devices must not be used in conditions where the oxygen level is low (< 19 vol.-%). At high concentrations a breathing apparatus must be used (self-contained or fresh air hose breathing apparatus). Filter must be changed often enough.
Environmental exposure controls	Take precautions against leakage by constructing collecting pools and sewerage systems as well as by surfacing the loading and unloading stations.

9. Physical and Chemical Properties

Information on basic physical and chemical properties

Appearance	Liquid.
Color	Clear.
Odor	Mild.
Odor threshold	-
pH	-
Melting point	Pour point < -20°C @ 1013 hPa (BS4633, EC A1)
Initial boiling point and range	180-320°C (EN ISO 3405)
Flash point	> 61°C (EN ISO 2719, EC A9)
Upper/lower flammability or explosive limits	-
Vapour pressure	0,087 kPa @ 25°C (EC A4)
Vapour density	-
Relative density	0,77 - 0,79 @ 15/4°C (EN ISO 12185, EC A3)
Solubility(ies)	Insoluble in water. ~ 0,075 mg/l water @ 25°C (calculated) Soluble in the following materials: Methanol. Hydrocarbons.
Partition coefficient	log Kow: > 6,5 (EC A8)
Auto-ignition temperature	204°C (EC A15)
Decomposition Temperature	-

NEXBTL Renewable Diesel; Neste 100 % NEXBTL -diesel; Neste Green 100 -diesel

Viscosity	Kinematic viscosity 4.0 mm ² /s @ 20°C 2.6 mm ² /s @ 40°C (OECD 114) Dynamic viscosity ≤ 5 mPa s @ 20°C
Explosive properties	Not considered to be explosive. (EC A14)
Oxidising properties	Does not meet the criteria for classification as oxidizing.
Other information	Not known.

10. Stability and reactivity

Reactivity	There are no known reactivity hazards associated with this product.
Stability	Stable at normal ambient temperatures and when used as recommended.
Possibility of hazardous reactions	No potentially hazardous reactions known.
Conditions to avoid	Keep away from heat, sparks and open flame.
Materials to avoid	Oxidizing agents.
Hazardous decomposition products	Does not decompose when used and stored as recommended.

11. Toxicological information

Information on toxicological effects

Toxicological effects Based on available data the classification criteria are not met.

Skin corrosion/irritation

Skin corrosion/irritation Based on available data the classification criteria are not met. (EC B4), Repeated exposure may cause skin dryness or cracking. The product irritates mucous membranes and may cause abdominal discomfort if swallowed. May cause respiratory system irritation.

Serious eye damage/irritation

Serious eye damage/irritation Based on available data the classification criteria are not met. (EC B5)

Skin sensitization

Skin sensitisation Based on available data the classification criteria are not met. (EC B6)

Germ cell mutagenicity

Genotoxicity - in vitro Based on available data the classification criteria are not met. (EC B10, B13/14 & B17).

Carcinogenicity

Carcinogenicity Based on available data the classification criteria are not met.

IARC carcinogenicity Not listed.

NTP carcinogenicity Not listed.

OSHA Carcinogenicity Not listed.

Reproductive toxicity

Reproductive toxicity - fertility Based on available data the classification criteria are not met. (OECD 416)

Specific target organ toxicity - single exposure

STOT - single exposure Not classified as a specific target organ toxicant after a single exposure.

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Specific target organ toxicity - repeated exposure

STOT - repeated exposure Based on available data the classification criteria are not met. (OECD 408)

Aspiration hazard

Aspiration hazard May be fatal if swallowed and enters airways. Entry into the lungs following ingestion or vomiting may cause chemical pneumonitis.

Route of entry Inhalation Ingestion Skin and/or eye contact

Toxicological information on ingredients.

Alkanes, C10-20 -branched and linear

Acute toxicity - oral

Notes (oral LD₅₀) LD₅₀ >2000 mg/kg, Oral, Rat (EC B1 tris)

Acute toxicity - dermal

Notes (dermal LD₅₀) LD₅₀ > 2000 mg/kg, Dermal, Rat (EC B3)

12. Ecological Information

Toxicity

Toxicity Based on available data the classification criteria are not met.

Ecological information on ingredients.

Alkanes, C10-20 -branched and linear

Acute toxicity - fish LL₅₀, 96 hours: > 1000 mg/l, Fish
WAF (OECD 203)

Acute toxicity - aquatic invertebrates EL50, 48 hours: > 100 mg/l,
WAF (OECD 202)

Acute toxicity - aquatic plants EL50, 72 hours: > 100 mg/l, Algae
WAF (OECD 201)

Acute toxicity - microorganisms EC₅₀, 30 minutes: > 1000 mg/l, Micro-organisms (wastewater sludge)
EC₅₀, 3 hours: > 1000 mg/l, Micro-organisms (wastewater sludge)
(OECD 209)

Chronic toxicity - aquatic invertebrates NOEC, 21 days: 1 mg/l,
LOEC, 21 days: 3,2 mg/l,
WAF (OECD 211)
NOEC, 10 days: 373 mg/kg, Sediment organisms
LOEC, 10 days: 1165 mg/kg, Sediment organisms
LC₅₀, 10 days: 1200 mg/kg, Sediment organisms
(OSPAR Protocols, Part A: Sediment Bioassay, 2005)

Persistence and degradability

Stability (hydrolysis) No significant reaction in water.

Biodegradation Rapidly degradable
(OECD 301B).

NEXBTL Renewable Diesel; Neste 100 % NEXBTL -diesel; Neste Green 100 -diesel

Bioaccumulative potential

Bio-Accumulative Potential Possibly bioaccumulative.

Partition coefficient log Kow: > 6,5 (EC A8)

Mobility in soil

Mobility Evaporates slowly. The product has poor water-solubility. The product contains substances which are bound to particulate matter and are retained in soil. Log Koc > 5.6 (EC C19).

Results of PBT and vPvB assessment

Results of PBT and vPvB assessment This product does not contain any substances classified as PBT or vPvB.

Other adverse effects

Other adverse effects Not known.

13. Disposal considerations

Waste treatment methods

Disposal methods Dispose of waste to licensed waste disposal site in accordance with the requirements of the local Waste Disposal Authority. When handling waste, the safety precautions applying to handling of the product should be considered. Care should be taken when handling emptied containers that have not been thoroughly cleaned or rinsed out. Product residues retained in emptied containers can be hazardous. Waste packaging should be collected for reuse or recycling.

14. Transport information

UN Number

UN No. (DOT) 1202

UN No. (IMDG) Not classified under IMDG.

UN proper shipping name

Proper shipping name (DOT) UN 1202 DIESEL FUEL

Packing group

DOT pack group III

Environmental hazards

Environmentally Hazardous Substance

No.

Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code Transported by ship as bulk: Product name: Alkanes, C10-C26 linear and branched, (Flashpoint >60 deg.C) (NEXBTL Renewable Diesel). Pollution category: Cat Y Ship type: 3

15. Regulatory information

US State Regulations

California Proposition 65 Carcinogens and Reproductive Toxins

Not listed.

NEXBTL Renewable Diesel; Neste 100 % NEXBTL -diesel; Neste Green 100 -diesel

16. Other information

Abbreviations and acronyms used in the safety data sheet	ACGIH = American Conference of Governmental Industrial Hygienists IARC = International Agency for Research on Cancer NTP = National Toxicology Program OSHA = Occupational Safety and Health Administration TLV = Treshold Limit Value TWA = Time-Weighted Average WAF = Water Accommodated Fraction
Key literature references and sources for data	Regulations, databases, literature, own research. Chemical Safety Report Renewable hydrocarbons (diesel type fraction), 2013.
Revision comments	The entire document has been updated according to UN GHS. Revised classification.
Revision date	3/2/2016
Revision	3.0
SDS No.	5623
Hazard statements in full	H227 Combustible liquid. H304 May be fatal if swallowed and enters airways.
NFPA - health hazard	0
NFPA - flammability hazard	2
NFPA - instability hazard	0
NFPA - special hazard	-
ACA HMIS Health rating.	2
ACA HMIS Flammability rating.	2
ACA HMIS Physical hazard rating.	0

The information given is based on data currently available to us and is believed to be correct. No warranty is expressed or implied regarding the accuracy of this data or the results obtained from the use thereof. No responsibility is assumed for injury or damage from the use of the products described herein. The information given is designed only as a guidance for safe handling, use, processing, storage, transportation, disposal and release and is not to be considered a warranty or quality specification.

Section 1 – Identification

Product identifier	Renewable Diesel
Other means of identification	
Synonyms	VelociD™, Renewable Hydrocarbon Diesel, RHD, Renewable Diesel, Renewable Synthetic Diesel Fuel, Renewable Diesel Fuel, Bio-Derived Diesel, Biomass-Based Diesel, Diesel Fuel No. 2, R98.9 Diesel Fuel, odorless mineral spirits, hydrotreated esters and fatty acids, HEFA, HVO, HDRD, HRD, R99.9, RD, paraffinic middle distillate, RD975, REG – 9000™ / RHD, REG 9000 / RHD, REG RDB5, R100.
Recommended use	Fuel for use in compression ignition engines, in other combustion applications, a solvent, or an industrial blendstock.
Restrictions on use	Not intended for direct human consumption.
Supplier information	REG Marketing & Logistics Group, LLC 416 S. Bell Ave Ames, IA 50010 (888) 734-8686
Emergency phone number	Call ChemTel LLC for emergency service 24 hours a day (800) 255-3924 (North America) +1 (813) 248-0585 (International)

Section 2 – Hazard(s) Identification

Classification (in accordance with 29 CFR 1910.1200)

Hazard Class	Hazard Category	Route of Exposure
Skin Irritation	Category 2	Absorption / Dermal Contact
Eye Irritation	Category 2A	Absorption / Eye Contact
Aspiration Hazard	Category 1	Ingestion then aspiration
Flammable Liquid	Category 3	Physical Hazard

Signal word **DANGER**

Pictograms



Hazard Statements

H315	Causes skin irritation
EUH066	Repeated contact may cause skin dryness or cracking
H319	Causes serious eye irritation
H304	May be fatal if swallowed and enters airways
H226	Flammable liquid and vapor

Precautionary statements

Prevention Wash hands thoroughly after handling. Wear protective gloves. Wear eye protection/face protection. Keep away from heat, sparks, open flames, hot surfaces. No smoking. Keep container tightly closed.

Ground/bond container and receiving equipment. Use explosion-proof electrical/ventilating/lighting equipment. Use only non-sparking tools. Take precautionary measures against static discharge.

Response	If swallowed: Immediately call a poison center/doctor. Do NOT induce vomiting. If on skin, wash with plenty of water. If skin irritation occurs: Get medical advice/attention. Take off contaminated clothing immediately and wash it before reuse. If in eyes: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If eye irritation persists: Get medical advice/attention. If on skin (or hair): Take off immediately all contaminated clothing. Rinse skin with water/shower. In case of fire: Use firefighting foam, dry chemical, carbon dioxide, or other clean extinguishing agents (such as Halon or Halotron) to extinguish.
Storage	Store locked up. Store in a well-ventilated place. Keep cool.
Disposal	Dispose of contents/container in accordance with local, regional, national, and international regulations.
Hazards not otherwise specified	Static Accumulator (50 picosiemens or less). This product can accumulate static charge by flow or agitation, and a static discharge could cause this product to ignite.
Ingredient(s) with unknown acute toxicity (if ≥ 1%)	This product is not classified based on testing of the mixture as a whole. Up to 100% of this mixture contains ingredients of unknown acute toxicity.

Section 3 – Composition / Information on Ingredients

Basic components This product is a complex combination of hydrocarbons obtained by the hydrodeoxygenation and catalytic hydroisomerization of animal fats and vegetable oils followed by distillative fractionation. It consists mostly of branched and linear paraffins having carbon numbers ranging from C₉ to C₁₈.

Chemical Name	Common Name & Synonyms	CAS number	% of product
Fuels, diesel, C9-18-alkane branched & linear	Renewable Hydrocarbon Diesel, RD, Renewable Diesel	1159170-26-9	98 – 100%
Fatty acids, C14-18 and C16-18-unsatd., Me esters	Methyl Esters	67762-26-9	< 5.5%
Petroleum fuel oil	Diesel Fuel	68476-30-2	< 1%
Diesel Oil C9-20	Fuels, Diesel	68334-30-5	< 1%

Section 4 – First-Aid Measures

First-aid measures for exposure

Inhalation	If breathing difficulties develop, move victim away from source of exposure and into fresh air. Seek medical attention.
Skin	Take off contaminated clothing immediately and wash it before reuse. If on skin, wash thoroughly with soap and water. If skin irritation or rash occurs, get medical advice.
Eyes	Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If irritation persists: Get medical attention.

Ingestion	Aspiration Hazard: Do NOT induce vomiting. If swallowed: Immediately call a poison control center or physician.
Most important symptoms / effects	
Acute	Aspiration into the lungs can cause fatal chemical pneumonitis. If ingestion has occurred, assume there is a risk of aspiration into the lungs – especially if nausea or irritation occurs.
Delayed / Chronic	Repeated exposure may cause dryness and cracking of the skin.
Indication of immediate medical attention	Aspiration into the lungs can cause fatal chemical pneumonitis. Treat symptomatically and supportively.
Special treatment needed, if necessary	No information available.

Section 5 – Fire-Fighting Measures

Suitable extinguishing media	Firefighting foam, dry chemical, carbon dioxide, or other clean extinguishing agents (such as Halon or Halotron). Water mist may be effective for extinguishing soaked oily materials if applied by experienced fire-fighting personnel.
Unsuitable extinguishing media	Do not use a solid water stream, as it may scatter and spread the fire.
Specific hazards arising from the chemical	Static accumulator (50 picosiemens or less), unless performance additive has been added to mitigate static accumulation. This product can accumulate static charge by flow or agitation, and a static discharge could cause this product to ignite. This product can be ignited by heat, sparks, flames, or other sources of ignition (e.g., static electricity, pilot lights, or mechanical/electrical equipment). Heated liquid can release vapors that may readily form flammable mixtures at or above its flash point. If container is not properly cooled, it can rupture in the heat of a fire.
Hazardous combustion products include	Carbon monoxide, carbon dioxide, nitrogen oxides, and hydrocarbons.
Protective equipment and precautions for firefighters	Incipient stage fires may be controlled with a portable fire extinguisher. For fires beyond the incipient stage, evacuate all unnecessary personnel. Emergency responders in the immediate area should wear standard firefighting protective equipment, including self-contained breathing apparatus (SCBA) and full bunker gear. In case of external fires in proximity to storage containers, use water spray to keep containers cool, if it can be done safely. Prevent runoff from entering streams, sewers, storm drains, or drinking water supply.

Section 6 – Accidental Release Measures

Personal precautions, protective equipment, and emergency procedures	Keep all sources of ignition away from spill / release. The use of explosion-proof equipment is recommended. Wear protective garments, impervious oil resistant boots, protective nitrile gloves, and safety glasses. If product has been heated, wear appropriate thermal and chemical protective equipment. If splash is a risk, wear splash resistant goggles and face shield. Shut off source of spill, if safe to do so. Contain spill to the smallest area possible. Isolate immediate hazard area and remove all nonessential personnel. Prevent spilled product from entering streams, sewers, storm drains, unauthorized treatment drainage systems, and natural waterways. Place dikes far ahead of the spill for later recovery and disposal. Immediate cleanup of any spill is recommended. If material spills
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into or upon any navigable waters and causes a film or sheen on the surface of the water, immediately notify the National Response Center at 1-800-424-8802.

Methods for containment and clean-up

Small spill / incidental release

Small spills can be cleaned up with absorbent inert media (oil dri, sand, or earth), or absorbent pads. Use soapy water or degreaser to remove oily residue from the affected area, then rinse area with water. Place saturated materials in an appropriate oily waste container (metal can with a metal lid or an enclosed oily waste dumpster), and dispose of according to local, state, and federal regulations.

Large spill / release

A spill remediation contractor with oil booms and skimmers may be needed for larger spills or spills that come into contact with a waterway or sensitive wetland. Recover as much product as possible by pumping it into totes or similar intermediate containers. Remove any remaining product with absorbent inert media (oil dri, sand, or earth), or absorbent pads. Use soapy water or degreaser to remove oily residue from the affected area, then rinse area with water. Place saturated materials in an appropriate oily waste container (metal can with a metal lid or an enclosed oily waste dumpster), and dispose of according to local, state, and federal regulations.

Other information

Materials saturated with this product, such as oily rags, used oil dri, soaked insulation pads, etc., may spontaneously combust due to product decomposition in the presence of oxygen. Place all such materials into appropriate oily waste containers (such as metal cans with metal lids or oily waste dumpsters with lids), and dispose of according to local, state, and federal regulations.

Section 7 – Handling and Storage

Precautions for safe handling

Open container slowly to relieve any pressure. When transferring product, use pipes, hoses, and tanks that are electrically bonded and grounded to prevent the accumulation of static electricity. This product can accumulate static charge by flow or agitation, and a static discharge could cause ignition. Use explosion-proof electrical equipment (ventilation, lights, material handling, etc...). Wash thoroughly after handling and before eating, drinking or using toilet facilities. Do not wear contaminated clothing or shoes. Keep contaminated clothing away from sources of ignition such as sparks or open flames.

“Empty” containers can retain residue that may be ignitable. Do not pressurize, cut, weld, braze, solder, drill, grind, or expose such containers to heat, flame, sparks or other sources of ignition. All containers should be disposed of in an environmentally safe manner and in accordance with governmental regulations.

Conditions for safe storage, including incompatibilities

Use and store this material in cool, dry, well ventilated areas away from all sources of ignition. Storage tanks should have an appropriate ventilation and pressure relief system. Store only in approved containers, and keep them tightly closed. Keep away from strong oxidizing agents, strong reducing agents, strong acids, and strong bases. Open containers should be carefully resealed and kept upright to avoid leakage. Protect the container against physical damage.

Section 8 – Exposure Controls / Personal Protection

Precautions for safe handling

Component exposure limits

The following constituents are the only constituents of the product which have a PEL, TLV or other recommended exposure limit. At this time, the other constituents have no known exposure limits.

Component	CAS #	OSHA PEL	ACGIH TLV	Form	Weight %
Fuels, diesel, C ₉₋₁₈	1159170-26-9	None	None	Liquid, Vapor or Aerosol	98-100%
ULS Diesel	68476-30-2	None	100 mg/m ³ TWA	Vapor & Aerosol	<2%

Appropriate engineering controls

Keep product enclosed in primary containment (hoses, pipes, tanks, etc.) to avoid contact with skin. Handle in accordance with good industrial hygiene and safety practices.

The level of protection and types of controls necessary will vary depending upon potential exposure conditions. Select controls based on a risk assessment of local circumstances. Appropriate measures include: Use sealed systems as far as possible. Adequate ventilation to control airborne concentrations below the exposure guidelines/limits. Local exhaust ventilation is recommended. Eye washes and showers should be available for emergency use. Firewater monitors and deluge systems are recommended. Always observe good personal hygiene measures, such as washing hands after handling the material and before eating, drinking, and/or smoking. Routinely wash work clothing and protective equipment to remove contaminants. Discard contaminated clothing and footwear that cannot be cleaned. Practice good housekeeping. Define procedures for safe handling and maintenance of controls. Educate and train workers in the hazards and control measures relevant to normal activities associated with this product. Ensure appropriate selection, testing and maintenance of equipment used to control exposure, e.g. personal protective equipment, local exhaust ventilation. Do not ingest. If swallowed then seek immediate medical assistance.

Hygiene measures

Wash hands, forearms and face thoroughly after handling chemical products, before eating, smoking and using the lavatory and at the end of the working period. Appropriate techniques should be used to remove potentially contaminated clothing. Wash contaminated clothing before reusing. Ensure that eyewash stations and safety showers are close to the workstation location.

Individual Protection Measures
Personal protective equipment
Eyes / face

Chemical splash goggles are recommended. However, if a local risk assessment determines that chemical splash goggles may not be required, safety glasses should be selected to provide adequate eye protection. If splash potential exists, add the use of a face shield.

Skin

Wear disposable nitrile gloves for incidental contact. For more substantial contact, wear thicker nitrile or other similar oil-resistant gloves. Wear protective garments, such as a chemical apron, chemical resistant coveralls, or chemical resistant coat and pants, along with impervious oil-resistant boots. Remove soaked protective equipment, decontaminate with soapy water, and rinse thoroughly before reuse. Note: product will cause natural rubbers to degrade at a very rapid rate. Such protective equipment will need to be carefully inspected after decontamination to see if it is still in serviceable condition. Any defective or worn out equipment should be immediately discarded.

Respiratory

No exposure limits are available for this product as a mixture, but appropriate organic vapor or supplied air respiratory protection may be worn if irritation or discomfort is experienced. Where required, respiratory protection must be provided and used in accordance with all local, state, and federal regulations.

Section 9 – Physical and Chemical Properties

Appearance - Physical State:	Liquid	Appearance - Color:	Clear to yellow/green tint (<i>May also be colored red – if sold for off road use</i>)
Odor:	Odorless to mild paraffin	Odor Threshold:	No information available

pH:	No information available	Melting/Freezing Point:	No information available
Boiling Point/Range:	150-315° C (300-600° F)	Flash Point:	>52° C (>125° F)
Evaporation Rate:	No information available	Flammability (solid/gas):	No information available
LFL:	0.6%	UFL:	4.7%
Vapor Pressure:	<0.3 mmHg @ 20° C	Vapor Density:	>1 (air=1)
Relative Density @ 15° C:	0.77 – 0.79 g/ml	Volatile Organic Compounds:	No information available
Solubility (H₂O):	Insoluble	Solubility (other):	No information available
Auto Ignition Temp.:	No information available	Decomposition Temp.:	No information available
Viscosity (at 40° C):	1.9 – 4.1 cP	Partition coefficient (n-octanol/water) :	No information available

Section 10 – Stability and Reactivity

Reactivity	When handled and stored appropriately, no dangerous reactions are known.
Chemical stability	Stable in closed containers at room temperature under normal storage and handling conditions. Hazardous polymerization will not occur.
Possibility of hazardous reactions	When handled and stored appropriately, no dangerous reactions are known. If product is heated beyond its flash point, vapors can cause a flash fire. See Sections 5 and 6 regarding spontaneous combustion of product-saturated absorbent materials.
Conditions to avoid	Ignition sources, accumulation of static electricity, heating product to its flash point, or allowing the product to cool below its melting point (otherwise it may solidify and not be transferable until it is reheated).
Incompatible materials	Keep away from strong oxidizing agents, strong reducing agents, strong acids, and strong bases.
Hazardous decomposition products	Carbon monoxides, carbon dioxide, nitrogen oxides, hydrocarbons, water vapor.

Section 11 – Toxicological Information

Likely routes of exposure	Absorption, ingestion, and inhalation.
Symptoms	
Inhalation	Coughing or irritation (vapor, mist, or aerosols).
Ingestion	Nausea, vomiting, or feeling unwell.
Skin contact	Redness, or irritation.
Eye contact	Redness or irritation and tearing.
Acute toxicity	
Oral	No information available.
Dermal	No information available.
Inhalation	No information available.

Skin corrosion / irritation	No testing was available. However, prolonged or repeated skin contact may irritate the skin and produce dermatitis.
Serious eye damage / eye irritation	No testing was available. However, oil mist may irritate the eyes.
Sensitization (<i>Respiratory or Skin</i>)	No information available.
Germ cell mutagenicity	No information available.
Carcinogenicity	No information available.
Component carcinogenicity	No information was available for the listed components of this product. However, IARC, NTP, and NIOSH list diesel exhaust particulates as a possible carcinogen.
Reproductive / developmental toxicity	No information available.
Specific target organ toxicity	No information available.
Single exposure	No information available.
Repeated exposure	No information available.
Aspiration hazard	Due to kinematic viscosity below 5.0 cSt, OSHA regulations state this product may be fatal if it is swallowed and then enters the airways.

Section 12 – Ecological Information

Acute ecotoxicity - short-term exposure	
Fish	No information available.
Invertebrates	No information available.
Algae	No information available.
Persistence and degradability	Biodegradation at >44% (per ASTM D5864-05).
Bioaccumulative potential	No information available.
Mobility in soil	No information available.
Other adverse effects	No information available.



Section 13 – Disposal Considerations

Disposal (<i>waste / unwanted product</i>)	This material, if discarded as produced, would be a RCRA “characteristic” hazardous waste due to the characteristic of ignitability (flash point <140° F). If the material is spilled to soil or water, characteristic testing of the contaminated materials is recommended. Further, this material, once it becomes a waste, is subject to the land disposal restrictions in 40 CFR 268.40 and may require treatment prior to disposal to meet specific standards. Consult federal, state and local regulations to ensure they are followed.
Disposal (<i>containers with residue</i>)	Container contents should be completely used and containers should be emptied prior to discarding. Containers must be disposed in compliance with federal, state, and local regulations. To assure

proper disposal of empty containers, consult federal, state and local regulations and disposal authorities.

US EPA Waste number & descriptions D001: Waste Flammable material with a flash point <140 °F

Section 14 – Transport Information

ID Number	UN1202
Proper Shipping Name	Diesel fuel
Transport Hazard Class	3
Packing Group	III
Placard	Flammable Liquid
Marine Pollutant	No
Transport in Bulk Requirements	242 (see 49 CFR §173.242)
Special Transportation Provisions	No information available
Special Note	No information available
Shipping Label	
Placard <i>(Shipment by truck or rail in bulk)</i>	

Section 15 – Regulatory Information

Inventory Listings

DSL Listed Exempt
TSCA Listed Exempt

U.S. Federal Regulations

Clean Water Act: This product does not contain any chemicals regulated as toxic pollutants pursuant to the Clean Water Act (40 CFR 401.15) when used as recommended.


CERCLA: This material, as supplied, does contain some substances regulated as hazardous substances under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) (40 CFR 302) or the Superfund Amendments and Reauthorization Act (SARA) (40 CFR 355). Although there is a "petroleum exclusion" clause which exempts crude oil (along with fractions of crude oil and products – both finished and intermediate) from the CERCLA 103 reporting requirements, there may be specific reporting requirements at the local, regional, or state level pertaining to releases of this material.

SARA 311/312 Hazard Categories:

Hazard Class
Skin Irritation
Eye Irritation
Aspiration Hazard
Flammable Liquid
<input checked="" type="checkbox"/> Hazard Not Otherwise Classified (HNOC) – see Section 2 for more information

U.S. State Regulations

California Proposition 65:

 This product can expose you to chemicals including [name of one or more chemicals], which is [are] known to the State of California to cause cancer. For more information go to www.P65Warnings.ca.gov

Fuels, diesel, No 2 (diesel engine exhaust is listed as a possible carcinogen)
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U.S. State Right-to-Know Regulations:

New Jersey

US New Jersey Worker and Community Right-to-know Act (New Jersey Statute Annotated Section 34:5A-5)

Component

CAS Number

Fuels, diesel, No 2

68476-34-8

Pennsylvania

US Pennsylvania Worker and Community Right-to-know Law (34 PA. Code Chap. 301-323)

Component

CAS Number

Fuels, diesel, No 2

68476-34-8

International Regulations

European Union Regulations

European Chemicals Agency (ECHA)

Renewable hydrocarbons (diesel type fraction)

EC | 700-571-2

REACH | 01-2120043692-58-0007

Tonnage Band | over 1000 tonnes/year

Section 16 – Other Information

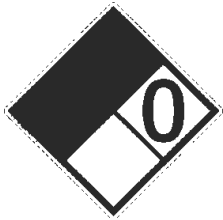
Issuing Date: Jan 20, 2014

Revision Date: April 14th, 2022

Version #: 20220414

Revision Note: Added synonym.

NFPA 704 Ratings	
Health Hazard:	1
Flammability:	2
Instability:	0
Other:	-



WARNING: POTENTIALLY HAZARDOUS MATERIAL. IMPROPER USE OR MISHANDLING CAN RESULT IN SERIOUS INJURY OR DEATH. THIS PRODUCT CONTAINS SUBSTANCES WHICH, IF MODIFIED, MAY BE FLAMABLE AND MAY BURN OR EXPLODE IF HEATED OR EXPOSED TO FLAME OR OTHER IGNITION SOURCE OR WATER, OXIDIZING AGENTS, ACIDS OR OTHER CHEMICALS. AVOID INGESTION, INHALATION AND CONTACT WITH SKIN AND EYES.

Disclaimer:

The information provided on this SDS is correct to the best of our knowledge, information and belief at the date of its publication. The information given is designed only as a guide for safe handling, use, processing, storage, transportation, disposal and release and is not to be considered as a warranty or quality specification. The information relates only to the specific material designated and may not be valid for such material used in combination with any other material or in any process, unless specified in the text.

End of SDS

Supplemental Information

Off Permit Changes and Minor Mods



16 Computer Drive West
 Albany, NY 12205
 Phone: 518.453.2203
 Fax: 518.453.2204
 www.envirospeceng.com

August 16, 2013

Donald Welsted
 NYS DEC Region 4
 Division of Air Resources
 1130 North Westcott Road
 Schenectady, NY 12306-2014

Re: Global Companies LLC - Albany, NY Terminal
 Title V Facility Permit No. 4-0101-00112/00029

Dear Mr. Welsted;

On behalf of Global Companies LLC (Global), Envirospec Engineering, PLLC is submitting this letter notification regarding the additional of butane blending capabilities at the Global Companies Albany Terminal (Terminal) located at 50 Church Street, Albany, New York. The terminal currently operates under Title V Facility Permit No. 4-0101-00112/00029.

Liquid butane from tank trucks will be blended with conventional gasoline in existing storage tanks. The butane will be combined with the existing gasoline throughput and there will be no associated throughput increase. Butane is not a HAP, however it is a VOC. Fugitive emissions will slightly increase from the Terminal as a result of the associated piping including valves, flanges, pumps, and fittings. An estimate of the fugitive emissions resulting from this new activity is provided below:

Component	Service	Emission Factor (lb/hr) (AP-42*)	Component Count	Hourly Emissions (lbs/hr)	Yearly Emissions (tons/year)
Valves	Light Liquids	0.0000948	0	0	0
	Vapor	0.0000287	10	0.000287	0.0013
Pumps	Light Liquids / Vapor	0.00117	2	0.002340	0.0102
Flanges	Light Liquid	0.0000172	0	0	0
	Vapor	0.0000904	32	0.002893	0.0127
TOTAL:				0.080399	0.0242

* AP-42, Protocol for Emission Leaks Emissions Estimates, Table 2-3, EPA (1995).

Global is requesting confirmation that no further action is required. In accordance with 6 NYCRR Part 201-6.6(c)(5), if Global does not receive notification from the department by the 15th day after receipt of this notification, Global will proceed with the requested modification after 25 days.

Should you have any questions please feel free to contact me at 518-453-2203 or Tom Keefe of Global Companies LLC at 781-398-4132.

Sincerely,



Nicole Brower, PE
Senior Engineer
Envirospec Engineering PLLC

Cc: Tom Keefe – Global Companies LLC
Ron Kenny – Operations Manager
Charles Furman – Terminal Manager



16 Computer Drive West • Albany, NY 12205 • Phone: 518.453.2203 • Fax: 518.453.2204

A Woman Owned Business Enterprise (WBE)



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August 23, 2013

Donald Welsted
NYS DEC Region 4
Division of Air Resources
1130 North Westcott Road
Schenectady, NY 12306-2014

Re: Global Companies LLC - Albany, NY Terminal
Title V Facility Permit No. 4-0101-00112/00029

Dear Mr. Welsted;

On behalf of Global Companies LLC (Global), Envirospec Engineering, PLLC is submitting this letter as follow-up to a notification submitted August 16th regarding the additional of butane blending capabilities at the Global Albany Terminal (Terminal) located at 50 Church Street, Albany, New York. The terminal currently operates under Title V Facility Permit No. 4-0101-00112/00029.

The addition of the butane to the Terminal qualifies as a minor modification. As stated in 6 NYCRR Part 621.4 (g), projects described in subparagraphs (i) - (ix) of Section (2) are major and all others are minor. The applicability of (i) - (ix) in relation to the butane project are addressed below:

- (i) projects subject to the Title V facility permit requirements under Part 201 of this Title including: initial permitting of subject facilities, permit renewals and significant permit modifications;
 - While the Global Albany Terminal is a Title V facility, the project is not an initial Title V permit, nor a renewal, nor a significant permit modification, as defined in 6 NYCRR Part 201.
- (ii) projects involving any preconstruction permit for construction and initial operation of new emission sources at Title V permitted facilities that are defined as significant permit modifications pursuant to Section 201-6.7(d) of this Title;
 - The project does not involve a preconstruction permit for construction and initial operation for a new emission source. No new emission sources are being proposed to the Title V permit that are defined as significant permit modifications, as defined in 6 NYCRR Part 201.

(iii) projects subject to major new source review permitting under Part 231 of this Title (new Source Review for New and Modified Facilities);

- The proposed project does not trigger major new source review under Part 231 as the project emission potential is 0.02 tpy (less than 50 lbs/year), which is below the threshold in Part 231.

(iv) projects requiring emission reduction credits;

- No emission reduction credits are required.

(v) projects requiring the use of a federally enforceable emission cap:

(a) to avoid major stationary source classification as defined in Part 201 of this Title; or

(b) to avoid more stringent emission controls that would otherwise be required for projects described under subparagraph (ii) above.

- No federally enforceable emission caps are being modified by this project. Federally enforceable emission caps are not being used to avoid major stationary source classification, as the source is already a major source of VOCs, and federally enforceable emission caps are not being used to avoid more stringent emission controls that would otherwise be required. The project only involves fugitive emissions.

(vi) projects involving emission sources subject to National Emission Standards for Hazardous Air Pollutants under 40 CFR 61, except for emission sources subject to 40 CFR Part 61 Subpart M -National Emission Standards for Hazardous Air Pollutants for Asbestos, Section 61.145, Standards for Demolition and Renovation (see Table 3 in Part 200 of this Title);

- The facility nor the project are subject to the listed NESHAPs as the project does not involve any asbestos or asbestos containing compounds not does it involve any demolition or renovation.

(vii) projects involving the construction of new facilities with emission sources subject to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 (See Table 4 in Part 200 of this Title); and

- No emission sources are being constructed which are subject to 40 CFR Part 63.

(viii) projects subject to title IV requirements under the CAA (see section 200 of this Title).

- No emission sources are being constructed which are subject to Title IV of the CAA.

(ix) UNAVAILABLE ON THE ONLINE VERSION OF THE REGULATION

- We will provide a response when we receive an official copy of the regulation.



6 NYCRR Part 201-6.6 (c) details when Minor Permit Modification procedures can be used. 6 NYCRR Part 201-6.6 (c)(1) states that Minor Permit Modification procedures may be used only for those permit modifications that do not exceed the criteria under subparagraphs (i) through (v). Those subparagraphs and a discussion on their applicability to this project are as follows:

- (i) Do not violate any applicable requirement.
 - The increase in fugitives as a result of the addition of the butane does not violate any applicable requirements.
- (ii) Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit and are not otherwise a significant change in the permit.
 - The addition of butane does not trigger any changes to existing monitoring, reporting, or recordkeeping requirements in the permit. Also, the addition of the butane will not result in a significant change in the permit.
- (iii) Do not require or change a case-by-case determination of a Federal emission limitation or other Federal standard, or a specific determination for portable sources causing adverse ambient impacts, or a visibility or increment analysis.
 - The addition of butane does not change or require a case by case determination of a Federal emission limitation or Federal standard.
- (iv) Do not seek to establish or change a permit term or condition that the facility has assumed to avoid an applicable requirement to which the emission source would otherwise be subject. Such terms and conditions include:
 - (a) a federally enforceable emissions cap assumed to avoid classification as a modification under any provision of title I of the act, including Part 231 of this Title; or
 - (b) an alternative emissions limit approved pursuant to the early reduction program under section 112 of the act.
 - The addition of butane does not change or require an emissions cap.
- (v) Are not modifications under any provision of title I of the act resulting in an NSR major modification as defined and regulated under Part 231 of this Title.
 - The addition of the butane emissions do not result in an NSR major modification.



An application for a minor permit modification should include the following information:

- (i) a description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
 - A description of the change and the emissions resulting from the change was provided on August 16, 2013. No new requirements are triggered by the modification. The butane blending operations will not result in an overall RVP increase of the final gasoline product at the Terminal. Furthermore, the facility is still subject to seasonal RVP limits on saleable gasoline and PTE emissions have already been modeled with seasonal maximum RVPs. Therefore, no increase in tank emissions in the PTE will occur.
- (ii) certification by a responsible official, consistent with this Subpart, that the proposed modification meets the criteria contained herein for use of minor permit modification procedures and a request that such procedures be used;
 - Envirospec Engineering, PLLC is certifying on behalf of Global Companies LLC that the proposed modification meets the criteria contained herein for use of minor permit modification procedures and are requesting that such procedures are used.
- (iii) completed forms for use in notifying the administrator and affected states; and
 - There are no applicable application forms. Fugitive emissions will continue to be tracked as Process FG1.
- (iv) the major facility's suggested draft permit in a format acceptable to the department.
 - No changes to the permit are being requested at this time.

Therefore, Global is requesting confirmation that no further action is required and that this modification constitutes a Minor Permit Modification.

Should you have any questions please feel free to contact me at 518-453-2203 or Tom Keefe of Global Companies LLC at 781-398-4132.

Sincerely,



Nicole Brower, PE
Senior Engineer
Envirospec Engineering PLLC

Cc: Tom Keefe – Global Companies LLC
Ron Kenny – Operations Manager
Charles Furman – Terminal Manager



New York State Department of Environmental Conservation
Notice of Incomplete Application - This is NOT a Permit



Application ID: 4-0101-00112/00029

Batch Number: 717838

Facility: GLOBAL COMPANIES LLC - ALBANY TERMINAL
50 CHURCH ST - PORT OF ALBANY
ALBANY, NY 12202

Contact: TOM KEEFE Owner ID: 1526488
GLOBAL COMPANIES LLC
800 SOUTH ST PO BOX 9161
WALTHAM, MA 02454-9161

Permit(s) Applied for: 1 - Article 19 Air Title V Facility

Project Location: in ALBANY in ALBANY COUNTY

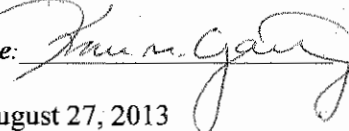
Your application for Permit is incomplete. The following items are required:

- 1) Please submit a short Environmental Assessment Form (EAF) and a project narrative for the proposed modification to blend liquid butane from tank trucks with conventional gasoline in existing storage tanks.
- 2) Please explain the purpose and need for the proposed project.
- 3) Please clarify if this proposed modification is related to the existing pending modification received on June 12, 2013.

cc: Don Welsted, NYSDEC R4 Division of Air
Nicole Brower, EnviroSpec Engineering, PLLC

**Please submit requested information by _____
No further action can be taken until all of these materials are received.**

Contact Person:
KAREN M GAIDASZ
NYSDEC
1130 NORTH WESTCOTT RD
SCHENECTADY, NY 12306

Signature: 
Date: August 27, 2013

Telephone Number: (518) 357-2459



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Albany, NY 12205
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www.envirospeceng.com

August 29, 2013

Karen M Gaidasz
NYS DEC Region 4
1130 North Westcott Rd
Schenectady, NY, 12306-2014

Re: DEC Permit Application #4-0101-00112/00029
Global Companies LLC - Albany, NY Terminal
Air Title V Facility
City of Albany, Albany County

Dear Mrs. Gaidasz;

On behalf of Global Companies, LLC (Global), Envirospec Engineering, PLLC (Envirospec) is submitting this letter in response to your Notice of Incomplete Application dated August 27, 2013.

Comment 1. Please submit a Short Environmental Assessment Form (EAF) and a project narrative for the proposed modification to blend liquid butane from tank trucks with conventional gasoline in existing storage tanks.

Response 1. A completed Short EAF is enclosed. A project narrative was provided in the letter submitted to Don Welsted of the NYS DEC on August 16th. There is also a project description on the Short EAF.

Comment 2. Please explain the purpose and need for the proposed project.

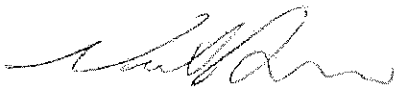
Response 2. EPA regulations restrict the volatility of gasoline used during the winter and summer months. Global will utilize butane to boost the RVP of gasoline to meet performance standards for internal combustion engines and also to comply with EPA fuel regulations. Primarily, this activity would be conducted during the transition from summer to winter gas (after September 15th); however it will not be limited to this timeframe.

Comment 3. Please clarify if this proposed modification is related to the existing pending modification received on June 12, 2013.

Response 3. This project is unrelated to the existing pending modification. The existing pending modification is to allow for the storage of heated petroleum products at the Terminal and butane is not a heated product. Heated products are heavier products which require heating to make them less viscous and are not blended with butane. The butane blending operations will only involve gasoline operations.

Should you have any questions please feel free to contact me at (518) 453-2203 or Tom Keefe of Global at (781) 398-4132.

Sincerely,



Nicole Brower, PE
Senior Engineer
Envirospec Engineering PLLC

cc: Gianna Aiezza, Envirospec Engineering
Donald Welsted, Division of Air, Region 4
Tom Keefe, Global Companies LLC





RE: Global Companies - Minor Mod - Notice of Incomplete Application

Nicole Brower to: Karen Gaidasz

08/29/2013 02:26 PM

Cc: Donald Welsted, Gianna Aiezza , "TKeefe@globalp.com"

Karen -

Please find attached response to the Notice of Incomplete Application.
Please let me know if any of the items require any additional clarification.

Thank you.
Regards,

Nicole Brower, PE
Senior Engineer
Office: (518) 453-2203 Ext. 123
Cell: (518) 209-4154

-----Original Message-----

From: Karen Gaidasz [mailto:kmgaidas@gw.dec.state.ny.us]

Sent: Tuesday, August 27, 2013 2:55 PM

To: Nicole Brower

Cc: Donald Welsted

Subject: Global Companies - Minor Mod - Notice of Incomplete Application

Nicole,

Attached please find a Notice of Incomplete Application for the minor modification for the additional butane blending capabilities.

Please feel free to contact me with any questions.

Thank you,
Karen

Karen M. Gaidasz, CPESC
Environmental Analyst
NYS Dept. of Environmental Conservation
Region 4 - Division of Environmental Permits
1130 North Westcott Road
Schenectady, New York 12306
518-357-2459 direct phone
518-357-2460 fax



Global Albany Butane DEP Response.pdf



RE: Global Companies - Minor Mod - Notice of Incomplete Application

Nicole Brower to: kmgaidas@gw.dec.state.ny.us

09/13/2013 10:55 AM

Cc: Gianna Aiezza, Tom Keefe

Karen -

Please see below in response to your inquiry:

1) New piping and equipment is minimal. Please see attached piping schematic from the contractor. A count of new valves, fittings, pumps, etc. was used to estimate fugitive emissions. Truck off-loading will occur at the existing ethanol transfer area.

2) During peak butane operations 4 daily butane deliveries are expected. The deliveries will likely be completed as round trips.

Please let me know if you need anything else.
Thank you.

Nicole Brower, PE
Senior Engineer
Office: (518) 453-2203 Ext. 123
Cell: (518) 209-4154

-----Original Message-----

From: Karen Gaidasz [mailto:kmgaidas@gw.dec.state.ny.us]

Sent: Wednesday, September 11, 2013 4:58 PM

To: Nicole Brower

Subject: RE: Global Companies - Minor Mod - Notice of Incomplete Application

Hi Nicole,

A few more questions on this application:

- 1) Could you please send a plot plan showing the new piping (and any other new structures) proposed for the butane blending project?
- 2) How many additional daily truck trips (one-way and round trip) is the butane blending project anticipated to generate?

Thank you,
Karen

Karen M. Gaidasz, CPESC
Environmental Analyst
NYS Dept. of Environmental Conservation
Region 4 - Division of Environmental Permits
1130 North Westcott Road
Schenectady, New York 12306
518-357-2459 direct phone
518-357-2460 fax

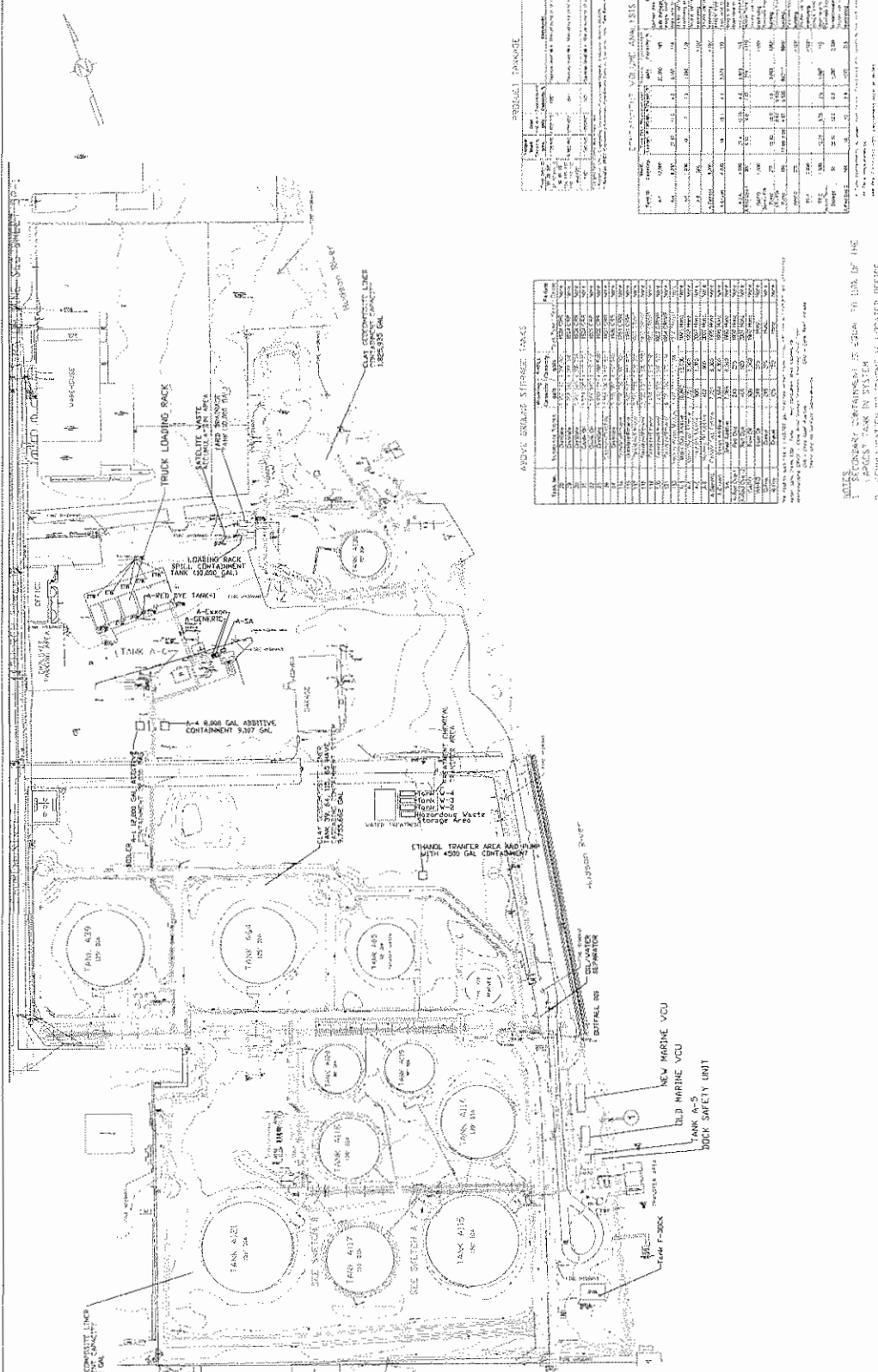
>>>

From: Nicole Brower <nbrower@envirospeceng.com>

To: Karen Gaidasz <kmgaidas@gw.dec.state.ny.us>

CC: Donald Welsted <dawelste@gw.dec.state.ny.us>, Gianna Aiezza <gaiezza@envirospeceng.com>, "TKeefe@globalp.com" <TKeefe@globalp.com>

Date: 8/29/2013 2:28 PM



PROPOSED TANKS

Tank No.	Capacity (GAL)	Material	Notes
A-21	100,000	Oil	Existing
A-22	100,000	Oil	Existing
A-23	100,000	Oil	Existing
A-24	100,000	Oil	Existing
A-25	100,000	Oil	Existing
B-1	100,000	Oil	Existing
B-2	100,000	Oil	Existing
B-3	100,000	Oil	Existing
B-4	100,000	Oil	Existing
B-5	100,000	Oil	Existing
C-1	100,000	Oil	Existing
C-2	100,000	Oil	Existing
C-3	100,000	Oil	Existing
D-1	100,000	Oil	Existing
D-2	100,000	Oil	Existing
D-3	100,000	Oil	Existing
D-4	100,000	Oil	Existing
D-5	100,000	Oil	Existing

EXISTING TANKS

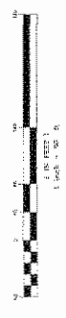
Tank No.	Capacity (GAL)	Material	Notes
A-21	100,000	Oil	Existing
A-22	100,000	Oil	Existing
A-23	100,000	Oil	Existing
A-24	100,000	Oil	Existing
A-25	100,000	Oil	Existing
B-1	100,000	Oil	Existing
B-2	100,000	Oil	Existing
B-3	100,000	Oil	Existing
B-4	100,000	Oil	Existing
B-5	100,000	Oil	Existing
C-1	100,000	Oil	Existing
C-2	100,000	Oil	Existing
C-3	100,000	Oil	Existing
D-1	100,000	Oil	Existing
D-2	100,000	Oil	Existing
D-3	100,000	Oil	Existing
D-4	100,000	Oil	Existing
D-5	100,000	Oil	Existing

- NOTES:**
1. PROPOSED TANKS ARE TO BE 100% OF THE PROPOSED TANK IN SYSTEM.
 2. CONTAINMENT SYSTEM IS LOCATED OFFICE.
 3. EMERGENCY RESPONSE EQUIPMENT IS IN THE OFFICE.
 4. 5. DUMPS STORED IN THE GARAGE BARGE ON AND HERE.

NO.	DATE	DESCRIPTION
1	10/15/11	ISSUED FOR PERMITTING
2	10/15/11	ISSUED FOR PERMITTING
3	10/15/11	ISSUED FOR PERMITTING
4	10/15/11	ISSUED FOR PERMITTING
5	10/15/11	ISSUED FOR PERMITTING
6	10/15/11	ISSUED FOR PERMITTING
7	10/15/11	ISSUED FOR PERMITTING
8	10/15/11	ISSUED FOR PERMITTING
9	10/15/11	ISSUED FOR PERMITTING
10	10/15/11	ISSUED FOR PERMITTING

SPIC CONSULTING, LLC
 1000 WEST 10TH AVENUE
 SUITE 100
 DENVER, CO 80202
 TEL: 303.733.1111
 FAX: 303.733.1112
 WWW.SPICCONSULTING.COM

PORT OF ALBANY TERMINAL SITE PLAN
 SCALE AS SHOWN

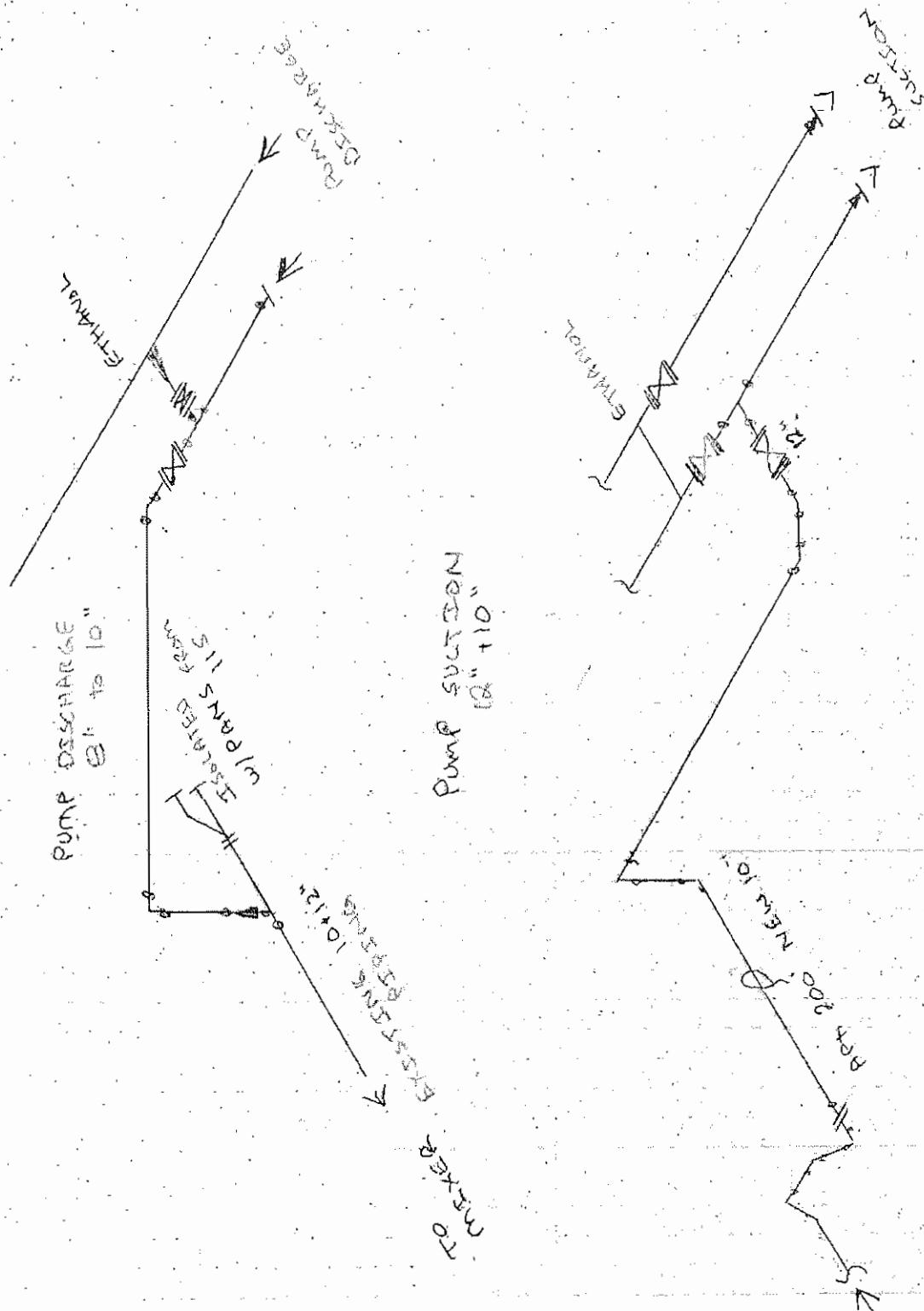


GLOBAL CONTAINMENTS, LLC
 ATTACHMENT 5B
 PORT OF ALBANY TERMINAL
 SITE PLAN
 SCALE: AS SHOWN
 SHEET: 5B OF 20



P.O. Box 197 • 309 Columbia Street • Rensselaer, New York 12144
518.434.1542 • Fax 518.426.1085 • Toll-Free Number 877.225.3177
www.petrochemusa.com

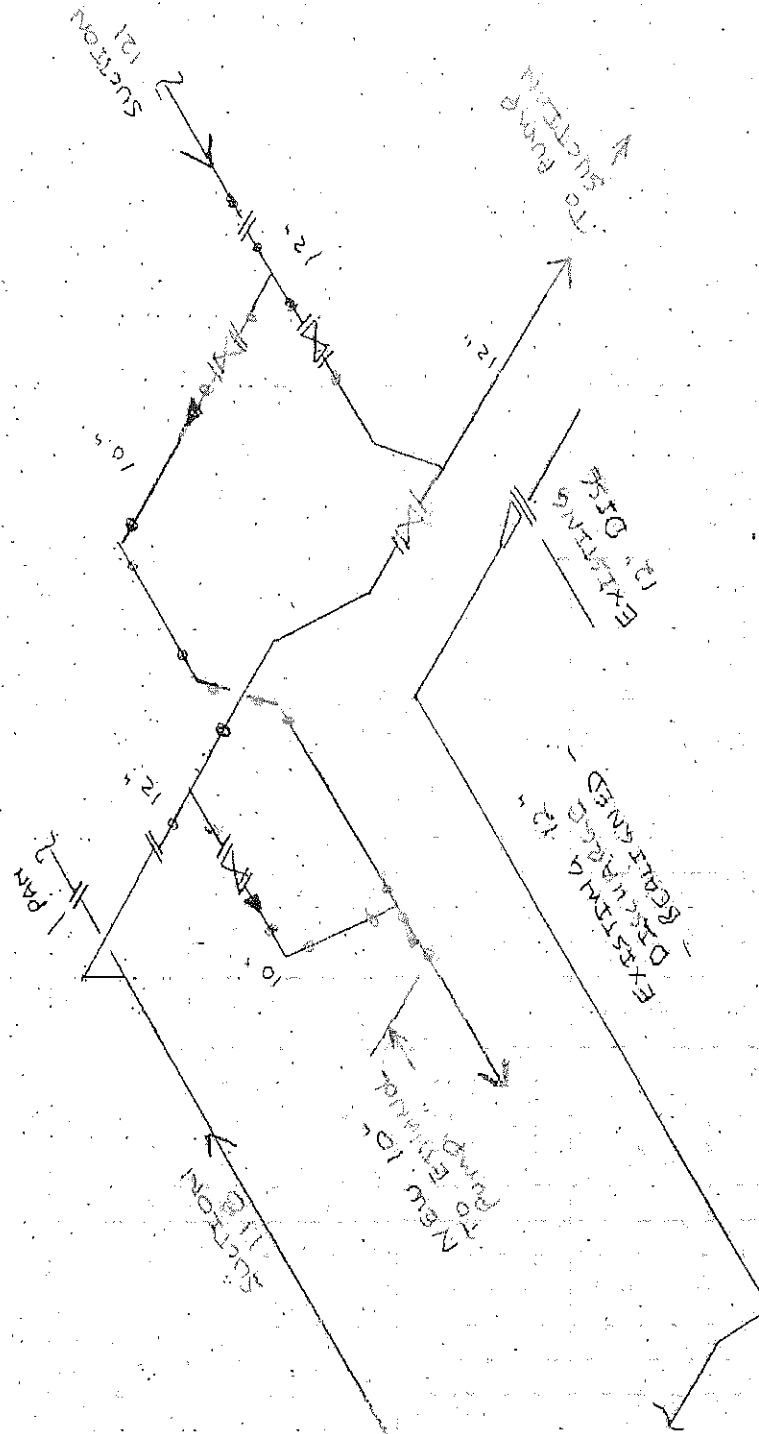
COMPANY _____
PROJECT Butane
LOCATION Ethanol Pumps
~~Job~~ Job 647
SHEET NO. _____ of _____ DATE 8-22-13





P.O. Box 197 • 309 Columbia Street • Rensselaer, New York 12144
S18.434.1542 • Fax S18.426.1085 • Toll-Free Number 877.225.3177
www.petrachemusa.com

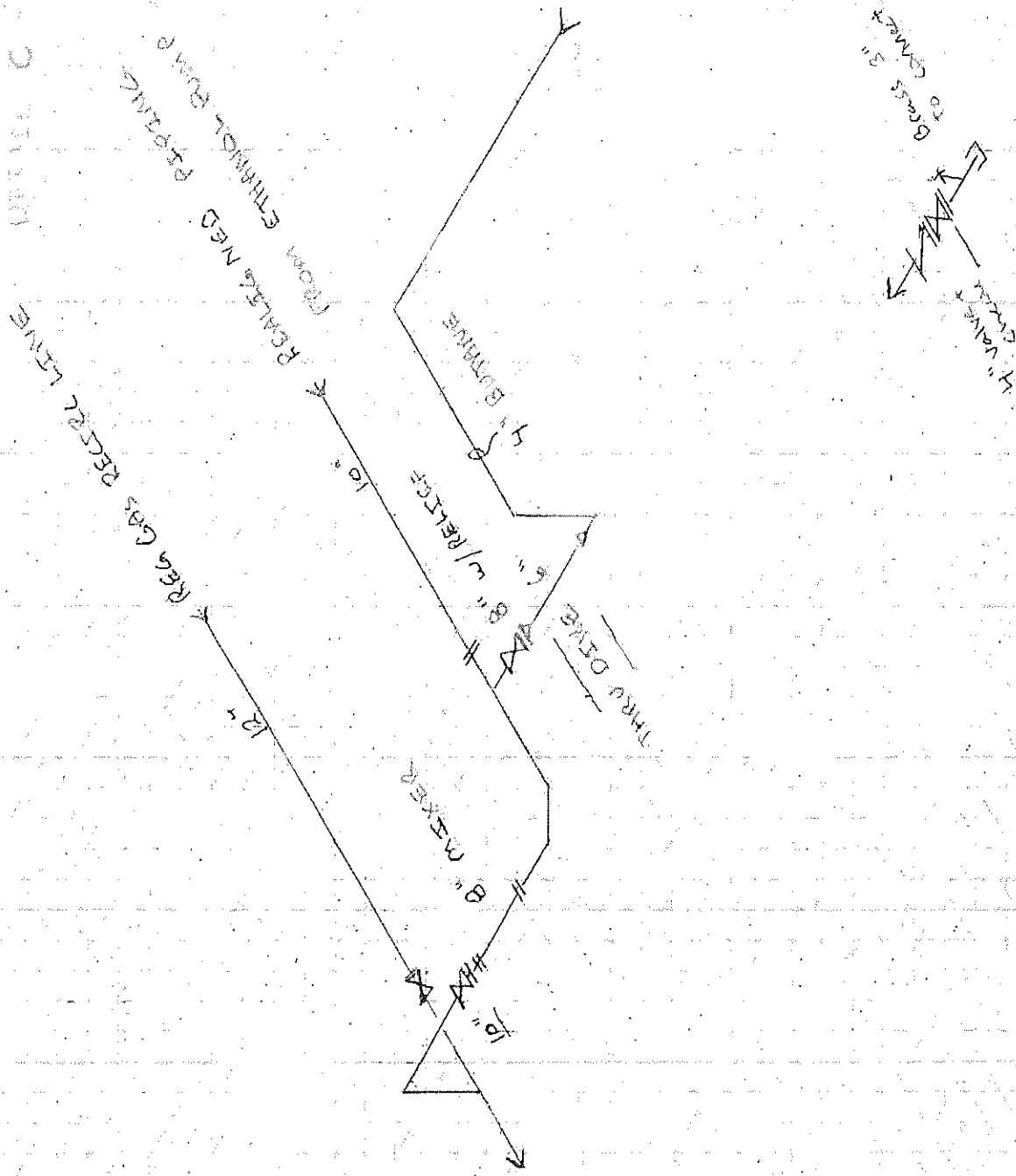
COMPANY _____
PROJECT Butane
LOCATION TANK SUCTION / DISC
BY JOB 647
SHEET NO. _____ of _____ DATE 8-22-13





P.O. Box 197 • 309 Columbia Street • Rensselaer, New York 12144
 518.434.1542 • Fax 518.426.1085 • Toll-Free Number 877.225.3177
 www.petrochemusa.com

COMPANY _____
 PROJECT Butane mixer
 LOCATION _____
 BY _____
 SHEET NO. _____ of _____ DATE 9-12-13



**New York State Department of Environmental Conservation
Division of Environmental Permits, Region 4**

1130 North Westcott Road, Schenectady, New York 12306-2014

Phone: (518) 357-2069 • FAX: (518) 357-2460

Website: www.dec.ny.gov



Joe Martens
Commissioner

September 16, 2013

Mr. Thomas F. Keefe
Global Companies, LLC
800 South Street
P.O. Box 9161
Waltham, MA 02454-9161

RE: **NOTICE OF COMPLETE APPLICATION**
Global Companies, LLC
Port of Albany Terminal
Butane Blending
DEC # 4-0101-00112/00029
City of Albany, Albany County

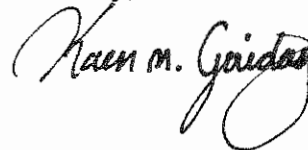
Dear Mr. Keefe:

On August 27, 2013, we received your application for a modification of the Air Title V Facility permit for the above referenced facility. It is our understanding that Global Companies, LLC is proposing to blend liquid butane from tank trucks with conventional gasoline in existing storage tanks. The purpose of the project is to use the butane to boost the RVP of gasoline to meet performance standards for internal combustion engines and to comply with EPA fuel regulations.

Upon review of the submitted application materials, Department staff have determined that the submitted application is a minor modification and have issued a Notice of Complete Application (enclosed). In accordance with NYCRR Subpart 201-6: Title V Facility Permits (c)(5), the facility may proceed with the requested minor modification upon receipt of the enclosed Notice of Complete Application.

If you have any questions or would like to discuss this further, please don't hesitate to contact me at 518-357-2459 or kmgaidas@gw.dec.state.ny.us.

Sincerely,

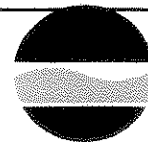


Karen M. Gaidasz
Environmental Analyst

Enclosures: Notice of Complete Application
cc via mail: City of Albany Local Waterfront Revitalization Program
cc via email: Don Welsted, NYSDEC R4 Division of Air
Nicole Brower, Envirospec Engineering, PLLC

THIS IS NOT A PERMIT

**New York State Department of Environmental Conservation
Notice of Complete Application**



Date 9/16/2013

Applicant Agent DARRELL BOEHLKE
GLOBAL CO ALBANY TERMINAL
50 CHURCH ST
ALBANY, NY 12202

Facility GLOBAL COMPANIES LLC - ALBANY TERMINAL
50 CHURCH ST - PORT OF ALBANY
ALBANY , NY 12202

Application ID 4-0101-00112/00029

Permit(s) Applied 1 - Air Title V Facility

Project is located In ALBANY in ALBANY COUNTY

Project Description addition of butane blending capabilities

Uniform Procedures Act

This is to advise you that your application for the permit(s) listed above is complete. It does not signify approval of your application for permit. Additional information may be requested from you at a future date if it is needed to reach a decision on your application. It has been determined that your application is a minor project. A decision is due to you within 45 days of the date of this notice.

State Environmental Quality Review (SEQR) Determination

Project is an Unlisted Action and will not have a significant impact on the environment. A Negative Declaration is on file. A coordinated review was not performed.

For further information please contact:

KAREN M GAIDASZ, NYSDEC
1130 NORTH WESTCOTT RD
SCHENECTADY, NY 12306
(518) 357-2459



349 Northern Blvd. Suite 3
Albany, NY 12204
Phone: 518.453.2203
Fax: 518.453.2204
www.envirospeceng.com

December 3, 2015

Donald Welsted
NYS DEC Region 4
Division of Air Resources
1130 North Westcott Road
Schenectady, NY 12306-2014

Re: Global Companies LLC - Albany, NY Terminal
Title V Facility Permit No. 4-0101-00112/00029
Wastewater Treatment Minor Modification

To Whom It May Concern;

On behalf of Global Companies LLC (Global), EnviroSpec Engineering, PLLC (EnviroSpec) is submitting this letter for a minor permit modification at the Global Albany Terminal (Terminal) located at, New York. The terminal currently operates under Title V Facility Permit No. 4-0101-00112/00029.

This modification is to incorporate emissions from a wastewater stream associated with a petroleum/water mixture reclamation process permitted under Solid Waste Management / 360 Permit 4-0101-00112/00028 and SPDES permit NY No. 0021016. The petroleum/water mixtures are collected at the Terminal for treatment. The treatment process involves air stripping of petroleum compounds from the incoming wastewater stream following primary and secondary separation and treating the resulting vapor stream in a catalytic oxidizer. The oxidizer provides greater than 99% control efficiency as indicated on the attached manufacturer specifications.

Emissions from the Terminal will increase slightly as a result of the treatment process. Emissions were based on representative samples of the influent wastewater stream. To be conservative, all VOCs in the wastewater were assumed to volatilize into the vapor stream. Estimates of the VOC emissions are attached in addition to permit application forms and an updated emission unit matrix.

The addition of the wastewater treatment process to the Terminal qualifies as a minor modification. As stated in 6 NYCRR Part 621.4 (g), projects described in subparagraphs (i) - (ix) of Section (2) are major and all others are minor. The applicability of (i) – (ix) in relation to the wastewater treatment project are addressed below:

(i) projects subject to the Title V facility permit requirements under Part 201 of this Title including: initial permitting of subject facilities, permit renewals and significant permit modifications;

- While the Global Albany Terminal is a Title V facility, the project is not an initial Title V permit, nor a renewal, nor a significant permit modification, as defined in 6 NYCRR Part 201.

(ii) projects involving any preconstruction permit for construction and initial operation of new emission sources at Title V permitted facilities that are defined as significant permit modifications pursuant to Section 201-6.7(d) of this Title;

- The project does not involve a preconstruction permit for construction and initial operation for a new emission source that is defined as a significant modification. No new emission sources are being proposed to the Title V permit that are defined as significant permit modifications, as defined in 6 NYCRR Part 201.
- (iii) projects subject to major new source review permitting under Part 231 of this Title (new Source Review for New and Modified Facilities);
- The proposed project does not trigger major new source review under Part 231 as the project VOC emissions are 0.08 tpy, which is well below the threshold in Part 231. An estimate of the emissions resulting from the proposed project are attached.
- (iv) projects requiring emission reduction credits;
- No emission reduction credits are required.
- (v) projects requiring the use of a federally enforceable emission cap:
- (a) to avoid major stationary source classification as defined in Part 201 of this Title; or
 - (b) to avoid more stringent emission controls that would otherwise be required for projects described under subparagraph (ii) above.
- No federally enforceable emission caps are being modified by this project. Federally enforceable emission caps are not being used to avoid major stationary source classification, as the source is already a major source of VOCs, and federally enforceable emission caps are not being used to avoid more stringent emission controls that would otherwise be required.
- (vi) projects involving emission sources subject to National Emission Standards for Hazardous Air Pollutants under 40 CFR 61, except for emission sources subject to 40 CFR Part 61 Subpart M -National Emission Standards for Hazardous Air Pollutants for Asbestos, Section 61.145, Standards for Demolition and Renovation (see Table 3 in Part 200 of this Title);
- The facility nor the project are subject to the listed NESHAPs as the project does not involve any asbestos or asbestos containing compounds not does it involve any demolition or renovation.
- (vii) projects involving the construction of new facilities with emission sources subject to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 (See Table 4 in Part 200 of this Title); and
- No emission sources are being constructed which are subject to 40 CFR Part 63.
- (viii) projects subject to title IV requirements under the CAA (see section 200 of this Title).
- No emission sources are being constructed which are subject to Title IV of the CAA.



(ix) projects involving the construction of new highways or roads, or modification of any existing section of highway or road, which require an indirect source permit under Part 203 of this Title.

- No new highways or roads, or modification of any existing section of highway or road is proposed as part of this project.

6 NYCRR Part 201-6.6 (c) details when Minor Permit Modification procedures can be used. 6 NYCRR Part 201-6.6 (c)(1) states that Minor Permit Modification procedures may be used only for those permit modifications that do not exceed the criteria under subparagraphs (i) through (v). Those subparagraphs and a discussion on their applicability to this project are as follows:

- (i) Do not violate any applicable requirement.
 - The slight increase in emissions does not violate any applicable requirements.
- (ii) Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit and are not otherwise a significant change in the permit.
 - The addition of the wastewater treatment process does not trigger any changes to existing monitoring, reporting, or recordkeeping requirements in the permit. Also, the addition of the process will not result in a significant change in the permit.
- (iii) Do not require or change a case-by-case determination of a Federal emission limitation or other Federal standard, or a specific determination for portable sources causing adverse ambient impacts, or a visibility or increment analysis.
 - The addition of the wastewater treatment process does not change or require a case by case determination of a Federal emission limitation or Federal standard.
- (iv) Do not seek to establish or change a permit term or condition that the facility has assumed to avoid an applicable requirement to which the emission source would otherwise be subject. Such terms and conditions include:
 - (a) a federally enforceable emissions cap assumed to avoid classification as a modification under any provision of title I of the act, including Part 231 of this Title; or
 - (b) an alternative emissions limit approved pursuant to the early reduction program under section 112 of the act.
 - The addition of the wastewater treatment process does not change or require an emissions cap.
- (v) Are not modifications under any provision of title I of the act resulting in an NSR major modification as defined and regulated under Part 231 of this Title.
 - The addition of the emissions do not result in an NSR major modification.



An application for a minor permit modification should include the following information:

- (i) a description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
 - As previously stated, the modification will consist of the treatment of a wastewater stream associated with a petroleum/water mixture reclamation process at the Terminal. Treatment consists of an air stripper to volatilize petroleum compounds and treatment of the volatilized compounds through a catalytic oxidizer. VOC emissions will increase by 0.08 tpy. No new requirements are triggered by the modification.
- (ii) certification by a responsible official, consistent with this Subpart, that the proposed modification meets the criteria contained herein for use of minor permit modification procedures and a request that such procedures be used;
 - Envirospec Engineering, PLLC is certifying on behalf of Global Companies LLC that the proposed modification meets the criteria contained herein for use of minor permit modification procedures and are requesting that such procedures are used.
- (iii) completed forms for use in notifying the administrator and affected states; and
 - Applicable application forms are attached.
- (iv) the major facility's suggested draft permit in a format acceptable to the department.
 - Global is requesting the addition of the wastewater treatment process to the permit.

Global is requesting confirmation that no further action is required and that this modification constitutes a Minor Permit Modification. In accordance with 6 NYCRR Part 201-6.6(c)(5), if Global does not receive notification from the department by the 15th day after receipt of this notification, Global will proceed with the requested modification after 25 days.

Should you have any questions please feel free to contact me at 518-453-2203 or Tom Keefe of Global Companies LLC at 781-398-4132.

Sincerely,

Gianna Aiezza, PE
Principal Engineer
Envirospec Engineering PLLC

Cc: Tom Keefe – Director of EHS Operations
Paul Lavalle – Operations Manager



FALCO 300 SPECIFICATIONS



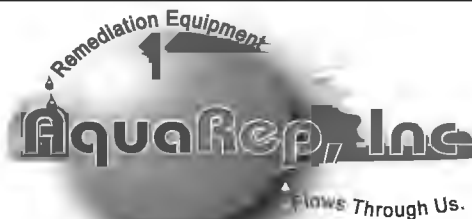
The FALCO 300 electric catalytic oxidizer treats air streams contaminated with volatile organic compounds. Startup is fully automatic. Controllers accurately regulate input loading and temperatures. The controls adjust a FALCO Vapor Control Valve (VCV) to maintain safe maximum input concentrations. Automatic shutdown results if temperatures exceed limits.

The FALCO 300 has an efficient heat exchanger. A bypass valve adjusts heat recovery. Low heat recovery enables operation at high vapor concentration. High heat recovery minimizes energy use during operation at low input vapor concentration. At 600 ppmv (Gasoline) and 300 scfm, sufficient heat is recovered to preheat the inflow without supplementary electric energy.

The FALCO 300 has a massive catalyst volume for its rated capacity, providing longer life and poison resistance than monolith type catalysts. If necessary, the catalyst can be replaced on site in one hour. New catalyst is poured in after the old catalyst is removed with a shop vacuum.



- **CAPACITY** 100-350 CFM
- **MAXIMUM INPUT LOADING** 250 lb/day petroleum hydrocarbons @ 350 cfm
- **DESTRUCTION EFFICIENCY** Up to 99.5%
- **CATALYST TEMPERATURE RANGE** 330-620°C (626-1148°F)
- **CATALYST** Packed bed 2.5 cubic feet. Platinum on 1/8" ceramic beads is standard. Optional catalyst for chlorinated solvents
- **HEAT EXCHANGER** Stainless steel spiral plate. 73% efficient at 300 scfm.
- **HEATER (Electric)** 56 amp @ 208 volts (20.3 kW) or, 64.6 amp @ 240 volts (27 kW) Solid State Control.
- **WEIGHT** 825 lb.
- **CONSTRUCTION** Stainless steel and aluminum
- **DIMENSIONS** 73" high (excluding 5' stack) X 70" long X 29" wide
Fits in the back of a pick-up truck
- **POWER REQUIREMENTS** 3 phase 208-240 Volt, optional 1 phase 240 Volt
- **APPROVALS** System is Factory Mutual approved for use in hazardous locations.
South Coast Air Quality Management District (SCAQMD) Certified Equipment Permit.



PHONE: 508-285-9210 FAX: 508-546-5613
9 Fletcher Way Norton, MA 02766
brendan@aquarepinc.com
www.aquarepinc.com



CALCULATION FORM

CLIENT/PROJECT NUMBER Global Albany PAGE 1 OF 1
 BY K. Szymaszek DATE 10/15/15 PROJECT NO. 1629.0001M007
 CHECKED BY G. Netuschil DATE 10/23/15
 DESCRIPTION Air Stripper Emission Calculation

Estimate VOC emissions with and without any air treatment. Assume 100% volatilization of all volatile compounds.

Compound	Concentration (ug/L)	Comments
1,2,4-Trimethylbenzene	1,480	
1,3,5-Trimethylbenzene	410	
2-Butanone (MEK)	1,200	
Acetone	7,690	
Benzene	18,700	
Chloromethane	133	
Ethanol	16,700,000	Compound not amenable to air stripping due to its low volatility
Ethylbenzene	5,900	
Isopropylbenzene	118	
Methylene Chloride	38.1	
Naphthalene	552	
n-Propylbenzene	244	
Toluene	57,600	
Xylenes (total) ³	41,600	

Total (ug/L) Σ = 135,665

Concentration 135,665 ug/L
 Design Flow Rate of System 4 gal/min

135,665 ug	0.001 mg	3.79 L	4 gallon	60 minutes	2.2 x 10 ⁻⁶ lbs
lb	1 ug	1 gallon	minute	hour	mg

0.27 lb / hour Untreated discharge rate

0.27 lbs	24 hours	365 days
hour	1 day	1 year

2,365 lbs / year Untreated discharge rate

Catalytic Oxidizer removal efficiency = 98% (see attached equipment specification sheet)

2,365 lbs	ton	95% capture efficiency	98% removal rate*
year	2,000 lbs		

0.0591 tpy fugitives
 0.0225 tpy
0.0816 tpy total emissions

*Although manufacturer's information states over 99% control, 98% was used to be conservative.

New York State Department of Environmental Conservation Air Permit Application



DEC ID											
4	-	0	1	0	1	-	0	0	1	1	2

APPLICATION ID															
-										/					

OFFICE USE ONLY															
	/		/												

Section I - Certification

Title V Certification	
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information [required pursuant to 6 NYCRR 201-6.3(d)] I believe the information is, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.	
Responsible Official THOMAS KEEFE	Title VP EHS OPERATIONS
Signature <i>[Handwritten Signature]</i>	Date 12/01/2015

State Facility Certification	
I certify that this facility will be operated in conformance with all provisions of existing regulations.	
Responsible Official N/A	Title N/A
Signature N/A	Date 1/1/

Section II - Identification Information

Title V Facility Permit <input type="checkbox"/> New <input type="checkbox"/> Significant Modification <input type="checkbox"/> Administrative Amendment <input type="checkbox"/> Renewal <input checked="" type="checkbox"/> Minor Modification <input type="checkbox"/> General Permit Title: _____	State Facility Permit <input type="checkbox"/> New <input type="checkbox"/> Modification <input type="checkbox"/> General Permit Title: _____
<input type="checkbox"/> Application involves construction of new facility <input type="checkbox"/> Application involves construction of new emission unit(s)	

Owner/Firm			
Name Global Companies LLC			
Street Address 800 South Street			
City Waltham	State MA	Country US	Zip 02453
Owner Classification	Taxpayer ID		
<input type="checkbox"/> Federal <input checked="" type="checkbox"/> Corporation/Partnership	<input type="checkbox"/> State <input type="checkbox"/> Individual	<input type="checkbox"/> Municipal	043443029
Facility			
Name Global Companies LLC - Albany Terminal			
Location Address 50 Church Street			
City / Town / Village Albany			Zip 12202
Project Description			
This modification is to incorporate emissions from a wastewater stream associated with a petroleum/water mixture reclamation process permitted under Solid Waste Management / 360 Permit 4-0101-00112/00028 and SPDES permit NY No. 0021016.			

Owner/Firm Contact Mailing Address			
Name (Last, First, Middle Initial) Tom Keefe		Phone No. (781) 398.4132	
Affiliation Global Companies LLC		Title VP EHS OPS	
Street Address 800 South Street		Fax No. (781) 398.9212	
City Waltham	State MA	Country US	Zip 02453
Facility Contact Mailing Address			
Name (Last, First, Middle Initial) Charles Furman		Phone No. (518) 436.6570	
Affiliation Global Companies LLC		Title Terminal Manager	
Street Address 50 Church Street		Fax No. (518) 436.6788	
City Albany	State NY	Country US	Zip 12202

New York State Department of Environmental Conservation
Air Permit Application



DEC ID											
4	-	0	1	0	1	-	0	0	1	1	2

Section III - Facility Information

Classification					
<input type="checkbox"/> Hospital	<input type="checkbox"/> Residential	<input type="checkbox"/> Educational/Institutional	<input type="checkbox"/> Commercial	<input checked="" type="checkbox"/> Industrial	<input type="checkbox"/> Utility

Affected States (Title V Only)					
<input type="checkbox"/> Vermont	<input type="checkbox"/> Massachusetts	<input type="checkbox"/> Rhode Island	<input type="checkbox"/> Pennsylvania	Tribal Land: _____	
<input type="checkbox"/> New Hampshire	<input type="checkbox"/> Connecticut	<input type="checkbox"/> New Jersey	<input type="checkbox"/> Ohio	Tribal Land: _____	

SIC Codes											
5171											

Facility Description		<input type="checkbox"/> Continuation Sheet(s)
PETROLEUM BULK TERMINAL		

Compliance Statements (Title V Only)
<p>I certify that as of the date of this application the facility is in compliance with all applicable requirements: <input checked="" type="checkbox"/> YES • <input type="checkbox"/> NO</p> <p>If one or more emission units at the facility are not in compliance with all applicable requirements at the time of signing this application (the 'NO' box must be checked), the noncomplying units must be identified in the "Compliance Plan" block on page 8 of this form along with the compliance plan information required. For all emission units at this facility that are operating <u>in compliance</u> with all applicable requirements complete the following:</p> <ul style="list-style-type: none"> This facility will continue to be operated and maintained in such a manner as to assure compliance for the duration of the permit, except those units referenced in the compliance plan portion of Section IV of this application. For all emission units, subject to any applicable requirements that will become effective during the term of the permit, this facility will meet all such requirements on a timely basis. Compliance certification reports will be submitted at least once a year. Each report will certify compliance status with respect to each requirement, and the method used to determine the status.

Facility Applicable Federal Requirements									<input type="checkbox"/> Continuation Sheet(s)
Title	Type	Part	Sub Part	Section	Sub Division	Paragraph	Sub Paragraph	Clause	Sub Clause

Facility State Only Requirements									<input type="checkbox"/> Continuation Sheet(s)
Title	Type	Part	Sub Part	Section	Sub Division	Paragraph	Sub Paragraph	Clause	Sub Clause

New York State Department of Environmental Conservation
Air Permit Application



DEC ID											
4	-	0	1	0	1	-	0	0	1	1	2

Section IV - Emission Unit Information

Emission Unit Description										• Continuation Sheet(s)
EMISSION UNIT	1	-	P	W	M	R	P	Petroleum/Water Mixture Reclamation Process		

Building					• Continuation Sheet(s)	
Building	Building Name			Length (ft)	Width (ft)	Orientation

Emission Point							• Continuation Sheet(s)
EMISSION PT.	0	0	2	w	w		
Ground Elev. (ft)	Height (ft)	Height Above Structure (ft)	Inside Diameter (in)	Exit Temp. (°F)	Cross Section		
					Length (in)	Width (in)	
	11		6				
Exit Velocity (FPS)	Exit Flow (ACFM)	NYTM (E) (KM)	NYTM (N) (KM)	Building	Distance to Property Line (ft)	Date of Removal	
EMISSION PT.							
Ground Elev. (ft)	Height (ft)	Height Above Structure (ft)	Inside Diameter (in)	Exit Temp. (°F)	Cross Section		
					Length (in)	Width (in)	
Exit Velocity (FPS)	Exit Flow (ACFM)	NYTM (E) (KM)	NYTM (N) (KM)	Building	Distance to Property Line (ft)	Date of Removal	

Emission Source/Control							• Continuation Sheet(s)
Emission Source		Date of Construction	Date of Operation	Date of Removal	Control Type		Manufacturer's Name/Model No.
ID	Type				Code	Description	
PWMRP	I						EASY
Design Capacity	Design Capacity Units			Waste Feed		Waste Type	
	Code	Description		Code	Description	Code	Description
Emission Source		Date of Construction	Date of Operation	Date of Removal	Control Type		Manufacturer's Name/Model No.
ID	Type				Code	Description	
CATOX	K				110	CATALYTICOXID	FALCO300
Design Capacity	Design Capacity Units			Waste Feed		Waste Type	
	Code	Description		Code	Description	Code	Description
350	39	CUBIC FEET PER MINUTE					

New York State Department of Environmental Conservation
Air Permit Application



DEC ID											
4	-	0	1	0	1	-	0	0	1	1	2

Section IV - Emission Unit Information (continued)

Process Information										Continuation Sheet(s)	
EMISSION UNIT								PROCESS			
1	-	P	W	M	R	P		P	W	M	
Description											
wastewater stream associated with a petroleum/water mixture reclamation process permitted											
under Solid Waste Management / 360 Permit 4-0101-00112/00028 and SPDES permit NY No. 0021016											
The petroleum/water mixtures are collected at the Terminal for treatment.											
The treatment process involves air stripping of petroleum compounds from the incoming wastewater stream following primary and secondary separation and treating the resulting vapor stream in a catalytic oxidizer											
Source Classification Code (SCC)		Total Thruput		Thruput Quantity Units							
		Quantity/Hr	Quantity/Yr	Code	Description						
		240	2,102,400	0045	GALLONS						
<ul style="list-style-type: none"> Confidential Operating at Maximum Capacity Activity with Insignificant Emissions 			Operating Schedule		Building	Floor/Location					
			Hrs/Day	Days/Yr							
			24	365							
Emission Source/Control Identifier(s)											
PWMRP											
CATOX											
EMISSION UNIT								PROCESS			
	-										
Description											
Source Classification Code (SCC)		Total Thruput		Thruput Quantity Units							
		Quantity/Hr	Quantity/Yr	Code	Description						
<ul style="list-style-type: none"> Confidential Operating at Maximum Capacity Activity with Insignificant Emissions 			Operating Schedule		Building	Floor/Location					
			Hrs/Day	Days/Yr							
			24	365							
Emission Source/Control Identifier(s)											

New York State Department of Environmental Conservation
Air Permit Application



DEC ID										
4	-	0	1	0	1	-	0	0	1	2

Section IV - Emission Unit Information (continued)

Emission Unit	Emission Point	Process	Emission Source	Emission Unit Applicable Federal Requirements										Continuation Sheet(s)	
				Title	Type	Part	Sub Part	Section	Sub Division	Parag.	Sub Parag.	Clause	Sub Clause		
-															
-															
-															
-															

Emission Unit	Emission Point	Process	Emission Source	Emission Unit State Only Requirements										Continuation Sheet(s)	
				Title	Type	Part	Sub Part	Section	Sub Division	Parag.	Sub Parag.	Clause	Sub Clause		
-															
-															
-															
-															

Emission Unit Compliance Certification											Continuation Sheet(s)	
Rule Citation												
Title	Type	Part	Sub Part	Section	Sub Division	Paragraph	Sub Paragraph	Clause	Sub Clause			
• Applicable Federal Requirement			• State Only Requirement			• Capping						
Emission Unit	Emission Point	Process	Emission Source	CAS No.			Contaminant Name					
-				-								
Monitoring Information												
<ul style="list-style-type: none"> • Continuous Emission Monitoring • Intermittent Emission Testing • Ambient Air Monitoring 					<ul style="list-style-type: none"> • Monitoring of Process or Control Device Parameters as Surrogate • Work Practice Involving Specific Operations • Record Keeping/Maintenance Procedures 							
Description												
Work Practice		Process Material					Reference Test Method					
Type	Code	Description										
Parameter		Manufacturer Name/Model No.										
Code	Description											
Limit				Limit Units								
Upper	Lower	Code	Description									
Averaging Method			Monitoring Frequency			Reporting Requirements						
Code	Description		Code	Description		Code	Description					



DEC ID											
4	-	0	1	0	1	-	0	0	1	1	2

P.E. Certification

I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments as they pertain to the practice of engineering. This is defined as the performance of a professional service such as consultation, investigation, evaluation, planning, design or supervision of construction or operation in connection with any utilities, structures, buildings, machines, equipment, processes, works, or projects wherein the safeguarding of life, health and property is concerned, when such service or work requires the application of engineering principals and data. Based on my inquiry of those individuals with primary responsibility for obtaining such information, I certify that the statements and information are to the best of my knowledge and belief true, accurate and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name of P.E. Gianna Aiezza, PE

Signature of P.E.

Date 12 / 01 / 15

NYS License No. 081422

Phone ~~518~~ 453.2203 x113

Emission Unit Matrix

Emission Unit ID	Emission Unit Description	Process ID	Process Description	SCC Code	Source ID	Source Description	Control ID	Control Description	Emission Point ID
1-TANKS	This emission unit represents storage tanks at the facility.	GAI	Gasoline storage tanks used for storage and distribution at terminal.	40-010-99	TK114 TK115 TK117 TK118 TK119 TK120 TK121 TK130 TK039	3,715,740 gallon tank 5,812,800 gallon tank 2,717,148 gallon tank 1,963,290 gallon tank 1,292,886 gallon tank 1,364,748 gallon tank 4,603,563 gallon tank 1,421,868 gallon tank 139,344,878 gallon tank	T114C T115C T117C T118C T119C T120C T121C T130C T099C	Internal Floating Roof Internal Floating Roof Internal Floating Roof Internal Floating Roof Internal Floating Roof Internal Floating Roof Internal Floating Roof Internal Floating Roof Internal Floating Roof	00114 00115 00117 00118 00119 00120 00121 00130 00739
		ET1	Ethanol storage tanks used for storage and distribution at terminal.	4-03-010-99	TK031 TK032 TK039 TK114 TK115 TK117 TK118 TK119 TK120 TK121 TK130	3,829,140 gallon tank 3,829,140 gallon tank 3,690,540 gallon tank 3,715,740 gallon tank 5,812,800 gallon tank 2,717,148 gallon tank 1,963,290 gallon tank 1,292,886 gallon tank 1,364,748 gallon tank 4,603,563 gallon tank 1,421,868 gallon tank	TK031C TK032C T099C T114C T115C T117C T118C T119C T120C T121C T130C	Internal Floating Roof Internal Floating Roof Internal Floating Roof Internal Floating Roof Internal Floating Roof Internal Floating Roof Internal Floating Roof Internal Floating Roof Internal Floating Roof Internal Floating Roof Internal Floating Roof	00731 00732 00739 00114 00115 00117 00118 00119 00120 00121 00130
		CR1	Crude Oil storage tanks used for storage and distribution at terminal.	4-03-010-99	TK031 TK032 TK114 TK115 TK117 TK118 TK119 TK120 TK121 TK130	3,829,140 gallon tank 3,829,140 gallon tank 3,715,740 gallon tank 5,812,800 gallon tank 2,717,148 gallon tank 1,963,290 gallon tank 1,292,886 gallon tank 1,364,748 gallon tank 4,603,563 gallon tank 1,421,868 gallon tank	TK031C TK032C T114C T115C T117C T118C T119C T120C T121C T130C	Internal Floating Roof Internal Floating Roof Internal Floating Roof Internal Floating Roof Internal Floating Roof Internal Floating Roof Internal Floating Roof Internal Floating Roof Internal Floating Roof Internal Floating Roof	00731 00732 00114 00115 00117 00118 00119 00120 00121 00130
		1FG	Wastewater tank contaminated with gasoline/distillate.	NOT NEEDED	1WATR	1,421,868 gal wastewater tank			001WW
1-RACK1	Truck loading rack with 3 gasoline bays and 5 distillate bays.	RLG	Emissions from VRU while loading gasoline/ethanol.	40-001-53	RACK1	Rack 1	VRUTK VACTK	Vapor Recovery Unit Vac Assist Vapor Reduction System	00001 00004
		R1D	Emissions from Rack 1 while loading distillate at Rack 1	4-04-001-50	RACK1	Rack 1			
		FG1	Fugitive HAP/VOC emissions from Rack 1 and associated piping	4-04-001-51	RACK1	Rack 1			
1-RACK2	Railcar loading rack with 2 loading positions for distillate and gasoline/ethanol with vapor combustion control.	R2G	Emissions from Vapor Combustion Unit while loading all gasoline/ethanol.	40-001-53	RACK2	Rack 2	VQURR	Vapor Combustion Unit	00002
		R2D	Emissions from Rack 2 while loading distillate.	4-04-001-50	RACK2	Rack 2			
		FG2	Fugitive HAP/VOC emissions from Rack 2 and associated piping	4-04-001-51	RACK2	Rack 2			
1-RACK3	This emission unit represents marine loading of product at dock.	R3E	Marine loading of ethanol at the dock with vapor combustion unit (VCU) control device.	40E-002-98	RACK3	Rack 3	VQJML	Vapor Combustion Unit for R3E/R3G	00003
		REG	Marine loading of gasoline at the dock with VCU control device.	4-0E-002-98	RACK3	Rack 3	VQJML	Vapor Combustion Unit for R3E/R3G	00003
		RED	Emissions from Rack 3 while loading distillate.	4-0E-002-98	RACK3	Rack 3			
		REC	Emissions from Rack 3 while loading crude oil.	4-0E-002-98	RACK3	Rack 3	VQJML	Vapor Combustion Unit for R3C	00006
		FG3	Fugitive HAP/VOC emissions from Rack 3 and associated piping	4-04-001-51	RACK3	Rack 3			
1-RACK4	Railcar loading rack for distillate without control.	R4D	Emissions from Rack 4 while loading distillate.	40-04-001-50	RACK4	Rack 4			00005
		FG4	Fugitive HAP/VOC emissions from Rack 4 and associated piping.	4-04-001-51	RACK4	Rack 4			
1-PWMP	petroleum/water mixture reclamation process	PWM	Emissions from Air Stripper treated through catalytic oxidation	Not needed	PWMP	Air Stripper	CATOX	Catalytic oxidation	002WW



349 Northern Blvd, Suite 3
Albany, NY 12204
Phone: 518.453.2203
Fax: 518.453.2204
www.envirospeceng.com

November 15, 2016

Attn: Donald Welsted
NYSDEC Region 4 Headquarters
Division of Environmental Permits
1130 North Westcott Rd.
Schenectady, NY 12306-2014

Re: Global Companies LLC – Albany Terminal
Title V Facility Permit No. 4-0101-00112/00029

Dear Mr. Welsted,

On behalf of Global Companies LLC (Global), EnviroSpec Engineering, PLLC is submitting the attached application for a Minor Permit Modification at Global's Albany Terminal, located at 50 Church Street, Albany, New York. The terminal currently operates under Title V Facility Permit No. 4-0101-00112/00029.

The purpose of this application is to permit gasoline and ethanol loading at the marine loading rack utilizing the Vapor Combustion Unit identified as VCUM2, which is currently permitted for crude oil loading only and has a rated for a control efficiency of 3 mg/L. Marine loading of gasoline and ethanol are currently allowed at the terminal and are controlled by the Vapor Combustion Unit identified as VCUM1 that has a rated control efficiency of 10 mg/L. Global is requesting the flexibility to load gasoline and ethanol through either marine control device. No changes are being requested to the existing permitted product throughputs. The requested change would affect the following permit conditions, further detailed on the attached annotated permit:

- Page 31, Condition 4-3
- Page 44, Condition 35
- Page 102, Condition 4-11
- Page 103, Condition 4-12
- Page 111, Condition 107.8
- Page 111, Condition 107.9

The New York State Department of Environmental Conservation has recently demanded that Global conduct a new stack test of VCUM2 to confirm that the unit is meeting its permitted control efficiency of 3 mg/L. As previously noted, the unit is currently permitted to handle only crude oil. Because the terminal is not currently managing crude oil, Global cannot conduct the requested stack test without first modifying the permit to authorize the loading of gasoline and ethanol through VCUM2. More generally, the change will allow Global to load gasoline and ethanol using the more efficient MVCU.

The use of VCUM2 to control gasoline and ethanol marine loading qualifies as a minor modification. As stated in 6 NYCRR §621.4 (g), projects described in subparagraphs (i) - (ix) of Section (2) are major and all others are minor. The applicability of (i) – (ix) in relation to this project is addressed below:

- (i) projects subject to the Title V facility permit requirements under Part 201 of this Title including: initial permitting of subject facilities, permit renewals and significant permit modifications;
- While the Global Albany Terminal is a Title V facility, the modification is not an initial Title V permit, nor a renewal, nor a significant permit modification, as defined in 6 NYCRR Part 201.

(ii) projects involving any preconstruction permit for construction and initial operation of new emission sources at Title V permitted facilities that are defined as significant permit modifications pursuant to Section 201-6.7(d) of this Title;

- The modification does not involve a preconstruction permit for construction and initial operation for a new emission source. The modification also does not involve construction of a new emission source that is defined as a significant permit modification, under 6 NYCRR Part 201.

(iii) projects subject to major new source review permitting under Part 231 of this Title (new Source Review for New and Modified Facilities);

- The proposed modification does not trigger major new source review under Part 231 as it will not cause an increase in facility emissions.

(iv) projects requiring emission reduction credits;

- No emission reduction credits are required.

(v) projects requiring the use of a federally enforceable emission cap:

(a) to avoid major stationary source classification as defined in Part 201 of this Title; or

(b) to avoid more stringent emission controls that would otherwise be required for projects described under subparagraph (ii) above.

- No federally enforceable emission caps are being modified by this modification. Federally enforceable emission caps are not being used to avoid major stationary source classification, as the source is already a major source of VOCs, and federally enforceable emission caps are not being used to avoid more stringent emission controls that would otherwise be required. The modification does not involve any increase in emissions.

(vi) projects involving emission sources subject to National Emission Standards for Hazardous Air Pollutants under 40 CFR 61, except for emission sources subject to 40 CFR Part 61 Subpart M - National Emission Standards for Hazardous Air Pollutants for Asbestos, Section 61.145, Standards for Demolition and Renovation (see Table 3 in Part 200 of this Title);

- No emission sources are being constructed which are subject to 40 CFR Part 61.

(vii) projects involving the construction of new facilities with emission sources subject to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 (See Table 4 in Part 200 of this Title);

- No emission sources are being constructed which are subject to 40 CFR Part 63.

(viii) projects subject to title IV requirements under the CAA (see section 200 of this Title).

- No emission sources are being constructed which are subject to Title IV of the CAA.



(ix) projects involving the construction of new highways or roads, or modification of any existing section of highway or road, which require an indirect source permit under Part 203 of this Title.

- No new highways or roads, or modification of any existing section of highway or road are proposed as part of this modification.

6 NYCRR §201-6.6 (c) details when Minor Permit Modification procedures can be used. 6 NYCRR §201-6.6 (c)(1) states that Minor Permit Modification procedures may be used only for those permit modifications that do not exceed the criteria under subparagraphs (i) through (v). Those subparagraphs and a discussion of their applicability to this project are as follows:

- (i) Do not violate any applicable requirement.
 - Using VCUM2 to control gasoline and ethanol marine loading does not violate any applicable requirements.
- (ii) Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit and are not otherwise a significant change in the permit.
 - The use of VCUM2 to control gasoline and ethanol marine loading does not trigger any changes to existing monitoring, reporting, or recordkeeping requirements in the permit. Also, it will not result in a significant change in the permit.
- (iii) Do not require or change a case-by-case determination of a Federal emission limitation or other Federal standard, or a specific determination for portable sources causing adverse ambient impacts, or a visibility or increment analysis.
 - The use of VCUM2 to control gasoline and ethanol marine loading does not change or require a case-by-case determination of a Federal emission limitation or Federal standard.
- (iv) Do not seek to establish or change a permit term or condition that the facility has assumed to avoid an applicable requirement to which the emission source would otherwise be subject. Such terms and conditions include:
 - (a) a federally enforceable emissions cap assumed to avoid classification as a modification under any provision of title I of the act, including Part 231 of this Title; or
 - (b) an alternative emissions limit approved pursuant to the early reduction program under section 112 of the act.
 - The use of VCUM2 to control gasoline and ethanol marine loading does not change or require an emissions cap.
- (v) Are not modifications under any provision of title I of the act resulting in an NSR major modification as defined and regulated under Part 231 of this Title.
 - The use of VCUM2 to control gasoline and ethanol marine loading does not result in an NSR major modification.



An application for a minor permit modification should include the following information:

- (i) a description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
 - As previously stated, the modification will allow Global the flexibility to load gasoline and ethanol through either marine control device (VCUM2 and VCUM1). There will be no associated throughput or emissions increase. In fact, the change should decrease emissions per loading event because it will allow Global to load gasoline and ethanol using VCUM2, which has a significantly lower allowable emission limit (3 mg/L versus 10 mg/L) and is a newer and more efficient unit.
 - No new applicable requirements are triggered by the modification.
- (ii) certification by a responsible official, consistent with this Subpart, that the proposed modification meets the criteria contained herein for use of minor permit modification procedures and a request that such procedures be used;
 - Global Companies LLC is certifying that the proposed modification meets the criteria contained herein for use of minor permit modification procedures and are requesting that such procedures are used.
- (iii) completed forms for use in notifying the administrator and affected states; and
 - See attached application packet
- (iv) the major facility's suggested draft permit in a format acceptable to the department.
 - See attached annotated permit pages

In support of this application, please find attached the following items:

- Relevant facility application forms for the modification
- Annotated permit

Should you have any questions please feel free to contact me at 518-453-2203 or NBrower@envirospeceng.com or Tom Keefe of Global at (781) 398-4132 or TKeefe@globalp.com.

Sincerely,



Nicole Brower, PE
Senior Engineer
Envirospec Engineering PLLC



Tom Keefe
VP EHS Operations
Global Partners LP



New York State Department of Environmental Conservation
Air Permit Application



Department of Environmental Conservation

DEC ID											
4	-	0	1	0	1	-	0	0	1	1	2

Application ID																	
4	-	0	1	0	1	-	0	0	1	1	2	/	0	0	0	2	9

Application Type	
State Facility	* Title V

Section I - Certification

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information required to complete this application, I believe the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Responsible Official Tom Keefe	Title Vice President, EHS
Signature	Date 11/10/16

Professional Engineer Certification

I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments as they pertain to the practice of engineering. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Professional Engineer Nicole Brower, PE	NYS License No. 091076
Signature	Date 11/10/16

Section II - Identification Information

Type of Permit Action Requested

<input type="checkbox"/> New	<input type="checkbox"/> Renewal	<input type="checkbox"/> Significant Modification	<input type="checkbox"/> Administrative Amendment	<input checked="" type="checkbox"/> Minor Modification
Application for the construction of a new facility		Application involves the construction of new emission unit(s)		

Facility Information

Name Global Companies LLC - Albany Terminal	
Location Address 50 Church Street - Port of Albany	
* City / Town / Village Albany	Zip 12202

Owner/Firm Information

Name Global Companies LLC	Business Taxpayer ID	
Street Address 800 South Street	0 4 3 4 4 3 0 2 9	
City Waltham	State/Province MA	Country United States Zip 02454
Owner Classification:	<input type="checkbox"/> Federal	<input type="checkbox"/> State
	<input type="checkbox"/> Municipal	<input checked="" type="checkbox"/> Corporation/Partnership
	<input type="checkbox"/> Individual	

Owner/Firm Contact Information

Name Tom Keefe	Phone (781) 398-4132
E-mail Address TKeefe@globalp.com	Fax (781) 398-9212
Affiliation Global Companies LLC	Title Vice President, EHS
Street Address 800 South Street	
City Waltham	State/Province MA Country United States Zip 02454

Facility Contact Information

Name Chuck Furman	Phone (518) 445-1302
E-mail Address CFurman@globalp.com	Fax (518) 436-6788
Affiliation Global Companies LLC	Title Terminal Manager
Street Address 50 Church Street - Port of Albany	
City Albany	State/Province NY Country United States Zip 12202

**New York State Department of Environmental Conservation
Air Permit Application**



**Department of
Environmental
Conservation**

DEC ID											
4	-	0	1	0	1	-	0	0	1	1	2

Project Description	Continuation Sheet(s)
<p>The purpose of this application is to permit gasoline and ethanol loading at the marine loading rack utilizing the Marine Vapor Combustion Unit identified as VCUM2.</p>	

Section III - Facility Information

Facility Classification					
<input type="checkbox"/> Hospital	<input type="checkbox"/> Residential	<input type="checkbox"/> Educational/Institutional	<input type="checkbox"/> Commercial	<input checked="" type="checkbox"/> Industrial	<input type="checkbox"/> Utility

Affected States (Title V Applications Only)					
<input checked="" type="checkbox"/> Vermont	<input checked="" type="checkbox"/> Massachusetts	<input type="checkbox"/> Rhode Island	<input type="checkbox"/> Pennsylvania	Tribal Land: _____	
<input type="checkbox"/> New Hampshire	<input checked="" type="checkbox"/> Connecticut	<input type="checkbox"/> New Jersey	<input type="checkbox"/> Ohio	Tribal Land: _____	

SIC Code(s)			NAICS Code(s)		
5171			424710		

Facility Description	Continuation Sheet(s)
<p>The facility is classified as a gasoline/ethanol/distillate/crude terminal consisting of storage tanks permitted for various products such as gasoline/ethanol, additive, and distillate. There is a truck loading rack with 8 bays, a railcar loading rack, a railcar offloading facility, and a marine loading dock. Gasoline/ethanol loading is controlled by a vapor recovery unit at the truck rack and vapor combustion units at the rail car rack and marine loading dock. Crude oil loading is also controlled by vapor combustion units at the marine loading dock.</p>	

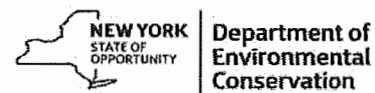
Compliance Statements (Title V Applications Only)
<p>I certify that as of the date of this application the facility is in compliance with all applicable requirements. <input checked="" type="checkbox"/> Yes* <input type="checkbox"/> No</p> <p>If one or more emission units at the facility are not in compliance with all applicable requirements at the time of signing this application (the 'NO' box must be checked), the noncomplying units must be identified in the "Compliance Plan" block on page 8 of this form along with the compliance plan information required. For all emission units at the facility that are operating <u>in compliance</u> with all applicable requirements, complete the following:</p> <p><input checked="" type="checkbox"/> This facility will continue to be operated and maintained in such a manner as to assure compliance for the duration of the permit, except those emission units referenced in the compliance plan portion of this application.</p> <p><input checked="" type="checkbox"/> For all emission units subject to any applicable requirements that will become effective during the term of the permit, this facility will meet such requirements on a timely basis.</p> <p><input checked="" type="checkbox"/> Compliance certification reports will be submitted at least once per year. Each report will certify compliance status with respect to each applicable requirement, and the method used to determine the status.</p>

Facility Applicable Federal Requirements										* Continuation Sheet(s)
Title	Type	Part	Subpart	Section	Subdivision	Paragraph	Subparagraph	Clause	Subclause	
6	NYCRR	200		6						
6	NYCRR	201	6	5	a	7				
6	NYCRR	201	6	5	c					
6	NYCRR	201	6	5	c	2				

Facility State Only Requirements										Continuation Sheet(s)
Title	Type	Part	Subpart	Section	Subdivision	Paragraph	Subparagraph	Clause	Subclause	
	ECL	19	0301							
	ECL	19	0301	3	b					
6	NYCRR	201	1	4						
6	NYCRR	211		2						

*See attached note

New York State Department of Environmental Conservation
Air Permit Application Form



DEC ID											
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Section III - Facility Information

Facility Description (continuation)

*Global Companies LLC received a Notice of Violation from the U.S. Environmental Protection Agency, dated July 29, 2016, alleging that emission increases associated with Global's project to allow/increase crude oil throughput at its Albany Terminal exceeded the significant modification threshold under the nonattainment New Source Review program. Global contests the allegations in the NOV and is working with EPA to resolve the matter. In addition, Global Companies LLC received a Warning Notice from DEC, dated October 20, 2016, stating that DEC had completed its review of a compliance emission testing report, dated August 7, 2013, for the Albany Terminal's marine vapor combustion unit (MVCU) (identified as VCUM2) and that alleged problems with the test prevented it from being used to demonstrate compliance with the MVCU's emission limit. Global contests key elements of the Warning Notice but it has prepared a new stack test protocol and is submitting it to DEC for approval with this permit modification application. It is Global's position that it is in compliance and no final administrative determination or adjudication of the above matters has been made.

New York State Department of Environmental Conservation
Air Permit Application Form

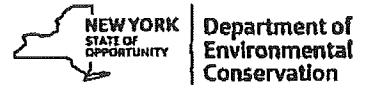


DEC ID											
4	-	0	1	0	1	-	0	0	1	1	2

Section III - Facility Information

Facility Applicable Federal Requirements (continuation)									
Title	Type	Part	Subpart	Section	Subdivision	Paragraph	Subparagraph	Clause	Subclause
6	NYCRR	201	6	5	c	3	ii		
6	NYCRR	201	6	5	e				
6	NYCRR	202	2	1					
6	NYCRR	202	2	5					
6	NYCRR	215		2					
6	NYCRR	200		7					
6	NYCRR	201	1	7					
6	NYCRR	201	1	8					
6	NYCRR	201	3	2	a				
6	NYCRR	201	3	3	a				
6	NYCRR	201	6	5	a	4			
6	NYCRR	201	6	5	a	8			
6	NYCRR	201	6	5	d	5			
6	NYCRR	201	6	5	f	6			
6	NYCRR	202	1	1					
40	CFR	68							
40	CFR	82	F						
6	NYCRR	201	6						
6	NYCRR	201	7						
6	NYCRR	202	1	2					
6	NYCRR	202	1	3	a				
6	NYCRR	211		1					
6	NYCRR	212		2					
6	NYCRR	212		4	a				
6	NYCRR	212		10	c	4	i		
6	NYCRR	225	1	2	a	2			
6	NYCRR	225	1	8	b				
6	NYCRR	225	1	8	d				
6	NYCRR	225	3	3	a				
6	NYCRR	229		1	d	2	i		
6	NYCRR	229		1	d	2	iv		

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4	-	0	1	0	1	-	0	0	1	1	2

Section III - Facility Information

Facility Applicable Federal Requirements (continuation)									
Title	Type	Part	Subpart	Section	Subdivision	Paragraph	Subparagraph	Clause	Subclause
6	NYCRR	229		1	d	2	v		
6	NYCRR	229		3	a				
6	NYCRR	229		3	d				
6	NYCRR	229		3	e	1			
6	NYCRR	231	11	2	c				
40	CFR	60	A	4					
40	CFR	60	A	7	a - g				
40	CFR	60	A	8	a - f				
40	CFR	60	A	9					
40	CFR	60	A	11					
40	CFR	60	A	11	d				
40	CFR	60	A	12					
40	CFR	60	A	13					
40	CFR	60	A	14					
40	CFR	60	A	15					
40	CFR	60	Kb	113b	a				
40	CFR	60	Kb	115b	a				
40	CFR	60	Kb	116b					
40	CFR	60	XX	502	b				
40	CFR	60	XX	502	e				
40	CFR	60	XX	502	f				
40	CFR	60	XX	502	g				
40	CFR	60	XX	502	i				
40	CFR	63	BBBBBB	11081	a				
40	CFR	63	BBBBBB	11083	b				
40	CFR	63	BBBBBB	11087					
40	CFR	63	BBBBBB	11088					
40	CFR	63	BBBBBB	11089					
40	CFR	63	BBBBBB	11092	a				
40	CFR	63	BBBBBB	11092	a	2			
40	CFR	63	BBBBBB	11092	a	3			

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Facility Compliance Certification										Continuation Sheet(s)	
Rule Citation											
Title	Type	Part	Subpart	Section	Subdivision	Paragraph	Subparagraph	Clause	Subclause		
Applicable Federal Requirement			Capping	CAS Number			Contaminant Name				
State Only Requirement											
Monitoring Information											
Work Practice Involving Specific Operations				Ambient Air Monitoring				Record Keeping/Maintenance Procedures			
Compliance Activity Description											
Work Practice Type Code	Process Material					Reference Test Method					
	Code	Description									
Monitored Parameter					Manufacturer's Name/Model Number						
Code	Description										
Limit			Limit Units								
Upper	Lower		Code	Description							
Averaging Method				Monitoring Frequency				Reporting Requirements			
Code	Description			Code	Description			Code	Description		

Facility Emissions Summary										Continuation Sheet(s)	
CAS Number	Contaminant Name					Potential to Emit (tons/yr)	Actual Emissions (pounds/yr)				
0NY075 - 00 - 5	PM-10										
0NY750 - 02 - 5	PM-2.5										
007446 - 09 - 5	Sulfur Dioxide										
0NY210 - 00 - 0	Oxides of Nitrogen										
000630 - 08 - 0	Carbon Monoxide										
007439 - 92 - 1	Lead (elemental)										
0NY998 - 00 - 0	Total Volatile Organic Compounds										
0NY100 - 00 - 0	Total Hazardous Air Pollutants										
0NY750 - 00 - 0	Carbon Dioxide Equivalents										
There are no changes to the Facility Wide Potential to Emit						with this permit mod.					

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Section IV - Emission Unit Information

Emission Unit Description										Continuation Sheet(s)	
Emission Unit	1	-	R	A	C	K	3				

This emission unit represents marine loading of products at the dock.

Building Information					Continuation Sheet(s)	
Building ID	Building Name			Length (ft)	Width (ft)	Orientation

Emission Unit		Emission Unit Emissions Summary				Continuation Sheet(s)					
1	-	R	A	C	K	3					
CAS Number	Contaminant Name										
	There are no changes to the Emission Unit Potential to Emit with this permit mod.										
ERP (lbs/yr)	Potential to Emit		Actual Emissions								
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)							
CAS Number	Contaminant Name										
ERP (lbs/yr)	Potential to Emit		Actual Emissions								
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)							
CAS Number	Contaminant Name										
ERP (lbs/yr)	Potential to Emit		Actual Emissions								
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)							
CAS Number	Contaminant Name										
ERP (lbs/yr)	Potential to Emit		Actual Emissions								
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)							

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4	-	0	1	0	1	-	0	0	1	1	2

Emission Point Information							Continuation Sheet(s)
Emission Point	0	0	0	0	3		
Ground Elevation (ft)	Height (ft)	Height Above Structure (ft)	Inside Diameter (in)	Exit Temp. (°F)	Cross Section		
-	36	-	72	-	Length (in)	Width (in)	
-	-	-	-	-	-	-	
Exit Velocity (FPS)	Exit Flow (ACFM)	NYTM (E) (KM)	NYTM (N) (KM)	Building	Distance to Property Line (ft)	Date of Removal	
-	-	601.833	4720.724	-	-	-	
Emission Point							
Ground Elevation (ft)	Height (ft)	Height Above Structure (ft)	Inside Diameter (in)	Exit Temp. (°F)	Cross Section		
					Length (in)	Width (in)	
Exit Velocity (FPS)	Exit Flow (ACFM)	NYTM (E) (KM)	NYTM (N) (KM)	Building	Distance to Property Line (ft)	Date of Removal	
Emission Point							
Ground Elevation (ft)	Height (ft)	Height Above Structure (ft)	Inside Diameter (in)	Exit Temp. (°F)	Cross Section		
					Length (in)	Width (in)	
Exit Velocity (FPS)	Exit Flow (ACFM)	NYTM (E) (KM)	NYTM (N) (KM)	Building	Distance to Property Line (ft)	Date of Removal	

Emission Source/Control Information							Continuation Sheet(s)
Emission Source		Date of Construction	Date of Operation	Date of Removal	Control Type		Manufacturer's Name/Model Number
ID	Type				Code	Description	
V	CUM2	-	-	-	127	Thermal Oxidation	-
Design Capacity	Design Capacity Units			Waste Feed		Waste Type	
	Code	Description		Code	Description	Code	Description
-	-	-		-	-	-	-
Emission Source		Date of Construction	Date of Operation	Date of Removal	Control Type		Manufacturer's Name/Model Number
ID	Type				Code	Description	
V	CUM L	-	-	-	127	Thermal Oxidation	-
Design Capacity	Design Capacity Units			Waste Feed		Waste Type	
	Code	Description		Code	Description	Code	Description
-	-	-		-	-	-	-
Emission Source		Date of Construction	Date of Operation	Date of Removal	Control Type		Manufacturer's Name/Model Number
ID	Type				Code	Description	
Design Capacity	Design Capacity Units			Waste Feed		Waste Type	
	Code	Description		Code	Description	Code	Description

New York State Department of Environmental Conservation
Air Permit Application



Department of Environmental Conservation

DEC ID		4 - 0 1 0 1 - 0 0 1 1 2	
Process Information			Continuation Sheet(s)
Emission Unit	1 - R A C K 3	Process	R 3 E
Process Description			
Marine loading of ethanol at Rack 3.			
Source Classification Code (SCC)	Total Throughput		Throughput Quantity Units
	Quantity/Hr	Quantity/Yr	Code Description
4-06-002-98	-	-	-
Confidential * Operating at Maximum Capacity	Operating Schedule		Building Floor/Location
	Hours/Day	Days/Year	
	24	365	
Emission Point Identifier(s)			
00003			
Emission Source/Control Identifier(s)			
VCUML	VCUM2		
Emission Unit	1 - R A C K 3	Process	R 3 G
Process Description			
Marine loading of gasoline at Rack 3.			
Source Classification Code (SCC)	Total Throughput		Throughput Quantity Units
	Quantity/Hr	Quantity/Yr	Code Description
4-06-002-98	-	-	-
Confidential * Operating at Maximum Capacity	Operating Schedule		Building Floor/Location
	Hours/Day	Days/Year	
	24	365	
Emission Point Identifier(s)			
00003			
Emission Source/Control Identifier(s)			
VCUML	VCUM2		

New York State Department of Environmental Conservation

Permit ID: 4-0101-00112/00029

Facility DEC ID: 4010100112



Emission Unit: I-RACK3

Process: R3C, R3G, R3E,

Regulated Contaminant(s):

Emission Source: VCUM2

CAS No: 0NY998-00-0 VOC

CAS No: 0NY100-00-0 HAP

Item 4-3.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The emission rate of the vapor combustion unit shall be limited to keep total HAP emissions below 23.75 tons/year and keep individual HAP emissions below 9.5 tons/year which is less than the applicability thresholds of 40 CFR 63, Subpart R. This also absolves the facility from applicability from 6 NYCRR 231-6.

Facility wide emissions were determined using the most current AP-42 emission factors and "TANKS" program. The throughput limits were calculated using a Vapor Combustion Unit (VCU) emission rate of 3 milligrams per liter.

The vapor combustion unit shall be tested with report submitted to Department within 180 days after initial notification of startup to determine if the vapor combustion unit achieves the 3 milligrams per liter limit.

The test shall be conducted in accordance with the procedures described in 6 NYCRR 202-1.

Parameter Monitored: 40 CFR 60-63 - TOTAL ORGANIC COMPOUNDS (TOC)

Upper Permit Limit: 3 milligrams per liter

Reference Test Method: Method 25A or 25B, Method 21, Method 2A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -

SEE MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2013.

Subsequent reports are due every 12 calendar month(s).

Condition 1-4: Capping Monitoring Condition

Effective between the dates of 08/10/2011 and 03/02/2016

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Item 1-4.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to

New York State Department of Environmental Conservation

Permit ID: 4-0101-00112/00029

Facility DEC ID: 4010100112



Emission Unit: 1RACK3

Process: R3E

Item 34.2:

No person shall cause or allow emissions that exceed the applicable permissible emission rate as determined from Table 2, Table 3, or Table 4 of 6 NYCRR Part 212 for the environmental rating issued by the commissioner.

Condition 35: Compliance Certification
Effective between the dates of 03/03/2011 and 03/02/2016

Applicable Federal Requirement: 6 NYCRR 212.4 (a)

Item 35.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-RACK3

Emission Point: 00003

Process: R3E

Emission Source: VCUML, VCUM2

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 35.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The Volatile Organic Compound (VOC) shall be reduced by a weight percent greater than or equal to 90% to ensure compliance with the emission standard in Table 2.

The emission rate was figured with a maximum loading rate of 168,000 gallons/hr while using the emission factor from AP-42 of 3.9 lbs/ 1000 gallons loaded equals an emission rate of 655 lbs/hour uncontrolled therefore the aforementioned emission standard applies. This condition also satisfies 6 NYCRR 212.10 RACT control of 81% by weight reduction.

Parameter Monitored: VOC

Lower Permit Limit: 90 percent by weight

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED
VALUE AT ANY TIME

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2012.

Subsequent reports are due every 12 calendar month(s).

New York State Department of Environmental Conservation

Permit ID: 4-0101-00112/00029

Facility DEC ID: 4010100112



Table 3 of subpart BBBBBB lists which parts of the general provisions in subpart A apply to the facility.

Condition 4-11: Compliance Certification
Effective between the dates of 11/07/2012 and 03/02/2016

Applicable Federal Requirement:40 CFR Part 64

Item 4-11.1:

The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: 1-RACK3

Process: R3C , R3E,
R3G

Emission Source: VCUM2

Emission Unit: 1-RACK3

Process: R3C

Emission Source: VCUML

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 4-11.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Once each day, while the Vapor Combustion Unit (VCU) is operating, the permittee will inspect the VCU for proper operation. Proper operation is that the pilot is lit for loading operations and the Ultraviolet Flame detection equipment indicates the presence of a flame.

An excursion occurs if the product is being loaded without the pilot flame being lit.

The facility shall comply with 40 CFR 64.7 and 64.9.

Monitoring Frequency: PER DELIVERY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2013.

Subsequent reports are due every 6 calendar month(s).

Condition 4-12: Compliance Certification
Effective between the dates of 11/07/2012 and 03/02/2016

Applicable Federal Requirement:40 CFR Part 64

Item 4-12.1:

The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:



New York State Department of Environmental Conservation

Permit ID: 4-0101-00112/00029

Facility DEC ID: 4010100112

Emission Unit: 1-RACK3

Process: R3C, R3E, R3G

Emission Source: VCUM2

Emission Unit: 1-RACK3

Process: R3C

Emission Source: VCUML

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 4-12.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A third party contractor specializing in Vapor Combustion Unit (VCU) maintenance shall inspect and perform any necessary maintenance on the unit once every six months. The facility shall comply with 40 CFR 64.7 and 40 CFR 64.9. Records documenting the semi-annual maintenance occurred shall be maintained in accordance with 6 NYCRR 201-6.5(c)(1) and (c)(2).

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2013.

Subsequent reports are due every 6 calendar month(s).

Condition 96: Compliance Certification

Effective between the dates of 03/03/2011 and 03/02/2016

Applicable Federal Requirement: 40 CFR Part 64

Item 96.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-RACK2

Process: R2E

Emission Point: 00002

Emission Source: VCURR

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 96.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A third party contractor specializing in Vapor Combustion Unit (VCU) maintenance shall inspect and perform any necessary maintenance on the unit once every six months. The facility shall comply with 40 CFR 64.7 and 40 CFR

New York State Department of Environmental Conservation

Permit ID: 4-0101-00112/00029

Facility DEC ID: 4010100112



This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-RACK3
Process: R3D Source Classification Code: 4-04-001-50
Process Description:
Emission associated with loading marine vessels with
distillate at Rack 3.

Emission Source/Control: RACK3 - Process

Item 107.8(From Mod 4):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-RACK3
Process: R3E Source Classification Code: 4-06-002-98
Process Description: Marine loading of ethanol at Rack 3.
Emission Source/Control: VCUML - Control; VCUM2
Control Type: VAPOR COMBUSTION SYSTEM (INCL VAPOR
COLLECTION AND COMBUSTION UNIT)
Emission Source/Control: RACK3 - Process

Item 107.9(From Mod 4):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-RACK3
Process: R3G Source Classification Code: 4-06-002-98
Process Description: Marine loading of gasoline at Rack 3.

Emission Source/Control: VCUML - Control; VCUM2
Control Type: VAPOR COMBUSTION SYSTEM (INCL VAPOR
COLLECTION AND COMBUSTION UNIT)

Emission Source/Control: RACK3 - Process

Item 107.10(From Mod 4):

This permit authorizes the following regulated processes for the cited Emission Unit:

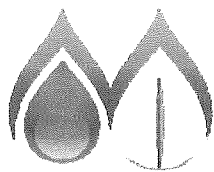
Emission Unit: 1-RACK4
Process: FG4 Source Classification Code: 4-04-001-51
Process Description:
Emissions associated with HAP/VOC from Rack 4 and
associated components.

Emission Source/Control: RACK4 - Process

Item 107.11(From Mod 4):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-RACK4
Process: R4D Source Classification Code: 4-04-001-51



MONTROSE
AIR QUALITY SERVICES

Test Protocol

For

Global Companies LLC

**50 Church Street
Albany, New York 12202
(518) 436-6570 Plant Phone Number
Air Permit No. 4-0101-00112/00029**

Submitted November 15, 2016

Prepared By:

Montrose Air Quality Services, LLC

Test Protocol

Marine Vapor Combustor Unit (VCU) performance testing.

Submitted to:

New York State Department of Environmental Conservation

Region 4

Mr. Don Welsted

(518) 357-2359

1150 North Westcott Road

Schenectady, New York 12306-2014

Montrose Project No. 516242

Protocol Submitted: November 15, 2016

Completed By:

Stewart Meadows

Stewart Meadows

Client Project Manager

704-933-0244

301 Brookdale Street

Kannapolis, NC 28083

Reviewed By:

Kent Childers

Kent Childers

District Manager

704-933-0244

301 Brookdale Street

Kannapolis, NC 28083

Scope of Work

Montrose Air Quality Services, LLC will conduct Marine Vapor Combustor testing at Global Companies LLC bulk storage/loading terminal in Albany, New York. A test date will be set once this test protocol has been approved. Please call if you have any questions regarding the information contained in this protocol.

Procedures

Testing will follow US EPA Test Methods 2A, 2B, 10, 21, 25A and 25B of 40 CFR 60 Appendix A and US EPA Method 205 of 40CFR51 Appendix M and NSPS standard 40CFR60 Subpart XX and MACT standard 40CFR63 subpart R. The calibration and quality assurance procedures of the "Quality Assurance Handbook for Air Pollution Measurement System" Volume III Stationary Source-Specific Methods will be followed throughout the duration of the field testing and laboratory analysis. The most current CFR will be used.

The following paragraphs summarize the methods to be used, detailed test procedures, QA/QC procedures, and other documentation to be used for this test program.

General Process Description (Vapor Combustor Unit):

Global Companies LLC owns and operates an existing bulk fuels storage/loading facility located at 50 Church Street, Albany, New York 12202 in conformity with the conditions of permit no. 4-0101-00112/00029.

The facility operates a marine loading rack that pumps ethanol. The normal loading volume is 140,000 barrels per day. The unit is rated for 15,000 barrels per hour.

Vapors from the loading process are displaced and captured by the vapor control system and routed to the air pollution control device (APCD), a John Zink vapor combustion unit. VOC emissions from the vapor combustor are limited to less than 3 milligrams per liter. The basis for testing is to show compliance with this standard.

Vapor processing is conducted as the vapors are received, there is no vapor holding tank, therefore, the operation is batch oriented (each tanker representing a batch) with each batch lasting approximately fifteen minutes.

US EPA METHOD 2A – Direct Measurement of Gas Volume Through Pipes and Small Ducts (Inlet to combustor)

This method applies to the measurement of gas flow rates in pipes and small ducts, either in-line or at exhaust positions, within the temperature range of 0 to 50°C.

A gas volume meter is used to measure exhaust gas volume directly. Temperature and pressure measurements are made to correct the volume to standard conditions. Montrose will utilize an 8" in-line Rockwell Turbo-meter, model # T-60. The turbine has a working operating temperature range of -40° to 165°F with a maximum working pressure of 175 PSI and is capable of measuring up to 60,000 cubic feet per hour with a sensitivity of 0.1 cubic feet.

Flow from the loading rack will be funneled into the Rockwell turbo-meter via connection to blind test flanges in the inlet vapor line from the loading rack. The turbo-meter will be placed in-line using two PVC elbows and eight-inch hoses constructed of a polypropylene type material. All connections will be leak tested via US EPA method 21 and a soap bubble solution.

Taps for static pressure, temperature, and concentration determinations are located immediately prior to the meter. These determinations, along with inlet volumetric airflow, will be electronically conveyed to a data acquisition system consisting of a data logger, a laptop computer with software package.

US EPA METHOD 2B – Determination of Exhaust Gas Volume Flow rate from Gasoline Vapor Incinerators (Exhaust of Combustor)

This method applies to the measurement of exhaust volume flow rate from incinerators that process gasoline vapors consisting primarily of alkanes, alkenes, and/or arenes (aromatic hydrocarbons). It is assumed that the amount of auxiliary fuel is negligible.

The incinerator exhaust flow rate is determined by carbon balance, inlet organic carbon concentration and volumetric inlet measurements. Organic carbon, carbon dioxide (CO₂), and carbon monoxide (CO) concentrations are measured at the outlet.

US EPA METHOD 10 – Determination of Carbon Monoxide Emissions from Stationary Sources

An integrated or continuous gas sample is extracted from the vapor stream exhaust and analyzed for carbon monoxide (CO) content using a NDIR analyzer. EPA method 10 is also cited in method 2b for the measurement of carbon dioxide. CO₂ will be analyzed using a Siemens Ultramat 23 analyzer. CO₂ will be logged in volume percent; CO in volume ppmv.

The analytical principal of both detectors is non-dispersive infrared. Sampling line will convey the stack gas down to the trailer and through a gas conditioning system to remove moisture (non-VOC analyzers) prior to entering the analyzer.

US EPA METHOD 21 – Determination of Volatile Organic Compound Leaks

All above ground portions of the vapor collection system will be leak tested, as much as feasible, with a TVA 1000B analyzer calibrated using hydrocarbon-free air and an EPA protocol mixture of 500 ppm methane in air to determine any potential source of leaks. The loading rack connections and all flanges, seals and flame arrestors will be checked prior to testing while a tanker is loading to determine compliance with the new GACT (40 CFR 63, Subpart BBBBBB) leak detection level of 500 ppm. The TVA 1000B will then be re-calibrated with methane (10,000 ppm), or 20% LEL. Therefore, by the method's definition, a leak will be any reading above 20% LEL. ***Sight, sound and smell will also be used in evaluating potential sources of leaks of tankers during the compliance test.*** If a tanker is suspected of leaking, then the tanker will be more closely checked using the TVA 1000B. Vapor-tight certification sticker numbers will be recorded for all loading tankers in lieu of actual Method 21 leak checks. This position is supported by EPA control document 0000085 entitled "Conducting Method 21 during Performance Tests". All measurements will be documented on Montrose's VCU leak test form.

Specifications of the TECO TVA-1000B are:

Measurement Ranges:	Dynamic Range (PID): 0 to 2,000 ppm Dynamic Range (FID): 0 to 50,000 ppm
Accuracy:	FID=±25% of reading or ±2.5 ppm, whichever is greater from 1.0 to 10,000 ppm; PID=±25% of reading or ±2.5 ppm, whichever is greater from 0.5 to 500 ppm
Repeatability:	±1%

Flowrate:	1000 cc (nominal)
Display:	Bar Graph and 4-digit LCD
Response Time:	<3.5 seconds for 90% of final value, using 100 ppm of isobutylene; <3.5 seconds for 90% of final value, using 10,000 ppm of methane.
Alarms:	High, Low, and STEL (short term exposure limit)
Input Output:	Analog output: 0 to 2VDC
Data Memory:	900 to 18,000 points, mode specific
Temperature Range:	0° to +50° C (32° to 122° F)
Dimensions:	13.5 x 10.3 x 3.2 in. (343 x 262 x 81 mm)
Weight:	Approx. 12 lb (5.4 kg)

US EPA METHOD 25A – Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer (Exhaust of Combustor)

Montrose will utilize a CAI model 600 FID to measure the hydrocarbon emissions from the exhaust in parts per million by volume (ppmv). Heated sample line will be utilized to transport the sample from the stack directly to the analyzer. The analytical principle is flame ionization detection (FID). The minimum detection level is 0.1 ppm (as methane) in an air matrix and has a sensitivity of 0.1 ppm methane on a 0-100 scale. Resolution on the low scale is 0.1 ppm; on ranges of 0-1,000 and 0-10,000 ppm, the resolution is 1.0 ppm. Sample flow rate is approximately 2.0 liters per minute.

US EPA METHOD 25B – Determination of Total Gaseous Organic Concentration Using a Non-Dispersive Infrared Analyzer (Inlet to Combustor)

US EPA Method 25B differs from Method 25A in analytical principle only. All other definitions and data quality objectives are unchanged. Montrose will utilize a CAI Model ZRE on the inlet to the combustor calibrated to a range of 0-65% propane (compared to exhaust ranges of 0-1000 ppm propane).

US EPA METHOD 205 – Verification of Gas Dilution Systems for Field Instrument Calibrations

Method 205 utilizes a **pre-calibrated** analyzer (Montrose employs the Siemens Ultramat 23), a 2020 Environics Gas Dilution system, a protocol cylinder of 20.0% CO₂ and UHP nitrogen. Following the procedures of US EPA Method 3A, the Ultramat 23 will be calibrated utilizing protocol gases of 20.00% and 9.98% carbon dioxide in nitrogen concentrations (or similar) and UHP nitrogen for zero. Following successful calibrations, US EPA Method 205 will be performed in the following manner. A mid-level audit gas (9.98%) will be injected into the analyzer in triplicate and must be within 2% precision and accuracy. Average errors will be reported. Two dilution levels will then be performed 10% and 5%. These will be injected into the analyzer in triplicate, one gas at a time, and the responses recorded, which must also be within 2% precision and accuracy. Once the dilution system has been verified, the remainder of the instruments will be calibrated utilizing the Environics and an appropriate US EPA protocol gas.

Environics 2020 Dilution System Specifications

DESCRIPTION

The Environics[®] Series 2020 Computerized Gas Dilution System automatically generates precise gas standards for rapid multi-point and multi-scale calibrations. The series 2020 precisely dilutes high concentration Protocol-1 or certified gas cylinders to an infinitely variable range of concentrations from high percents to low parts per million. The instrument meets or exceeds the performance requirements of the new United States EPA CFR Part 51 Method 205 Appendix M.

The Series 2020 consists of a single chassis supporting up to six (6) mass flow controllers (standard configuration), a serpentine pre-mix zone and a zero dead-space final mixing zone. Gas wetted surfaces are Electropolished 316 stainless steel. Seals are gas-compatible elastomer. The user interface includes a backlit 80-character by 25 line cold-cathode liquid-crystal display and membrane keypad.

The instrument's mass flow controllers are factory calibrated using a computer controlled primary flow standard traceable to the United States' National Institute of Standards and Technology (NIST). The calibration data consists of an eleven-point comparison of commanded versus actual flow with linear interpolation between the points.

The Series 2020 is available in a standard 19-inch rack mountable configuration for station or van usage or a portable bench-top version.

The optional RS-232 data interface permits remote or computer operation of the instrument.

Data Acquisition

Concentration values will be collected using an electronic data acquisition system. The data will be recorded and averaged for each sixty-second interval. Each minute average will be averaged for the duration of each test run.

General Procedures

Testing will begin at approximately 0600 and continue for a minimum of six hours. This time may be adjusted because a normal load is 20,000 barrels at a flow rate of 4,000 barrels an hour. This may make the test shorter than the six hours.

Instrumental span and zero drift checks will be conducted as loading permits, or at the conclusion of sampling.

QA / QC Procedures

Specific quality assurance / quality control procedures will be adhered to during this test project to provide valid and scientifically defensible data. For any environmental field and laboratory measurement, a degree of uncertainty exists in the data due to inherent limitations of the measurement systems employed. The objective of a QA/QC program is to produce data of known precision, accuracy, representation, completeness and comparability. The objective in this test project is to determine compliance with applicable air permit requirements.

CALCULATION FORMULAE FOR BULK STORAGE TERMINALS

1.

$$V_{Es} = \frac{293.16^{\circ}K}{760\text{mmHg}} \times G \times \frac{m^3}{35.315\text{ft}^3} \times V_m \times (P_g + P_b)$$

$$T_m$$

Where:

V_{es}	=	Standard volume of air-vapor mixture, m^3 (cubic meters)
G	=	Gas meter coefficient, unit less
V_m	=	Net gas meter volume, ft^3 (cubic feet)
P_g	=	Static pressure, mm Hg (millimeters mercury)
P_b	=	Atmospheric pressure, mm Hg (millimeters mercury)
T_m	=	Absolute temperature at meter, $^{\circ}K$ (degrees Kelvin)

2.

$$M_{e_i} = \frac{K \times V_{es_i} \times C_{e_i}}{1,000,000}$$

Where:

M_{e_i}	=	mass of emissions for interval i, milligrams
K	=	1,830,000 mg/scm (density of propane)
V_{es_i}	=	standard metered volume for interval i (from equation 1), m^3 (Cubic meters)
C_{e_i}	=	exhaust concentration for interval i, in ppmv of propane
1,000,000	=	ppm per unity

3.

$$E = \frac{\sum_1^n M_{e_i}}{L}$$

Where:

E	=	emission rate, mg VOC/L
L	=	liters of countable gasoline loaded during test period
n	=	number of test intervals, unit less

CALCULATION FORMULAE FOR BULK STORAGE TERMINALS

(continued)

4.

$$V_{e_s} = V_{i_s} \left[\frac{(KxHC_i)}{(KxHC_e) + CO_{2_e} + CO_e - 300} \right]$$

Where:

- CO_{2e} = mean exhaust concentration of carbon dioxide for i_{th} interval.
- CO_{2a} = measured ambient concentration of CO₂ (or may be assumed to be 300 ppm)
- CO_e = mean exhaust concentration of carbon monoxide for i_{th} interval.
- HC_e = mean exhaust organic concentration as defined by calibration gas, E.g. propane.
- HC_i = mean inlet organic concentration as defined by calibration gas, e.g. propane.
- V_{is} = measured inlet gas volume, m³ (cubic meters).
- V_{es} = calculated exhaust gas volume, m³ (cubic meters).
- K_{e or l} = Hydrocarbon calibration gas factor, propane=3.

5.

$$\bar{d} = \frac{1}{n} \sum_{i=1}^n d_i$$

Where:

- d = Arithmetic mean of the difference of a data set
- n = number of data points
- $\sum_{i=1}^n d_i$ = Algebraic summation of the individual differences, d_i.

6.

$$S_d = \sqrt{\frac{\sum_{i=1}^n d_i^2 - \frac{\left(\sum_{i=1}^n d_i\right)^2}{n}}{n-1}}$$

Where:

- S_d = standard deviation

CALCULATION FORMULAE FOR BULK STORAGE TERMINALS (continued)

7.

$$cc = t_{0.975} \frac{S_d}{\sqrt{n}}$$

Where:

$t_{0.975}$ = t-value from Table 2-1 of PS-2.

8.

$$RA = \frac{|\bar{d}| + |cc|}{RM} \times 100$$

Where:

\bar{d} = absolute value of the mean differences from equation 5
 cc = absolute value of the confidence coefficient from equation 7.
 RM = average reference method value. In cases where the average emissions for

the test are less than 50% of the applicable standard, substitute the emission standard value in the denominator of Equation 8. In all other cases, use RM.

RA = absolute mean difference between the gas concentration or emission rate determined by the reference method (RM), plus the 2.5% error confidence coefficient of a series of tests, divided by the mean of the RM tests or the applicable emission limit.

9.

$$H_T = K \sum_{i=1}^n C_i H_i$$

H_i = Net heating value of the sample. MJ/scm; where the net enthalpy per mole of offgas is based on combustion at 25 °C and 760 mm Hg, but the standard temperature for determining the volume corresponding to one mole is 20 °C.

K = Constant, 1.740×10^{-7} (1/ppm)(g mole/scm) (MJ/kcal), where the standard temperature for (g mole/scm) is 20 °C.

C_i = Concentration of sample component i in ppm on a wet basis, as measured for organics by Reference Method 18 and measured for hydrogen and carbon monoxide by ASTM D1946-77 or 90 (Reapproved 1994).

CALCULATION FORMULAE FOR BULK STORAGE TERMINALS (concluded)

H_i = Net heat of combustion of sample component i , kcal/g mole at 25 °C and 760 mm Hg. The heats of combustion may be determined using ASTM D2382-76 or 88 or D4809-95 if published values are not available or can not be calculated.

10.

$$V_F = \frac{\left(\frac{VFR_{scm}}{3600} \right)}{A_{Fn}}$$

Where:

V_f = velocity of the flare, meters per second
 VFR_{scm} = Volumetric flow rate, standard cubic meters per hour
3600 = Conversion from hours to seconds
 A_{fn} = Unobstructed cross-sectional area of the flare tip, m².

11.

$$V_{max} = 8.706 + 0.7084(H_T)$$

Where:

V_{max} = maximum permitted velocity, m/sec
8.706 = Constant
0.7084 = Constant
 H_T = The net heating value as determined in equation 10.



349 Northern Blvd, Suite 3
Albany, NY 12204
Phone: 518.453.2203
Fax: 518.453.2204
www.envirospeceng.com

May 31, 2017

Attn: Donald Welsted
NYSDEC Region 4
Division of Environmental Permits
1130 North Westcott Rd.
Schenectady, NY 12306-2014

Re: Global Companies LLC – Albany Terminal
Title V Facility Permit No. 4-0101-00112/00029
Minor Permit Modification – Gasoline Loading Rack

Dear Mr. Welsted,

On behalf of Global Companies LLC (Global), EnviroSpec Engineering, PLLC is submitting the attached application for a Minor Permit Modification at Global's Albany Terminal, located at 50 Church Street, Albany, New York. The terminal currently operates under Title V Facility Permit No. 4-0101-00112/00029.

The purpose of this application is to permit two (2) additional loading bays for gasoline/ethanol loading at the existing eight (8) bay truck rack, for a total of five (5) gasoline/ethanol loading bays. Gasoline/ethanol is currently permitted to be loaded at three (3) of the eight (8) bays. After the proposed change gasoline/ethanol would be permitted to be loaded at five (5) of the eight (8) bays. There would be no changes to distillate, which is loaded at seven (7) of the eight (8) bays. Global is not requesting to change any loading limits as part of this modification.

The requested change would affect the following permit condition, which is detailed on the attached annotated permit page:

- Page 20, Condition 22

The addition of loading arms for gasoline qualifies as a minor modification under 6 NYCRR Part 621. As stated in 6 NYCRR §621.4 (g)(2), projects described in subparagraphs (i) - (ix) of Section (2) are major and all others are minor. The applicability of (i) – (ix) in relation to this project is addressed below:

- (i) projects subject to the Title V facility permit requirements under Part 201 of this Title including: initial permitting of subject facilities, permit renewals and significant permit modifications;
 - While the Global Albany Terminal is a Title V facility, the modification is not an initial Title V permit, nor a renewal, nor a significant permit modification, as defined in 6 NYCRR Part 201.
- (ii) projects involving any preconstruction permit for construction and initial operation of new emission sources at Title V permitted facilities that are defined as significant permit modifications pursuant to Section 201-6.7(d) of this Title;
 - The modification does not involve a preconstruction permit for construction and initial operation for a new emission source. The modification also does not involve construction of a new emission source that is defined as a significant permit modification under 6 NYCRR §201-6.7(d).
- (iii) projects subject to major new source review permitting under Part 231 of this Title (new Source Review for New and Modified Facilities);

- The proposed modification does not trigger major new source review under Part 231.
- (iv) projects requiring emission reduction credits;
- No emission reduction credits are required.
- (v) projects requiring the use of a federally enforceable emission cap:
 - (a) to avoid major stationary source classification as defined in Part 201 of this Title; or
 - (b) to avoid more stringent emission controls that would otherwise be required for projects described under subparagraph (ii) above.
- No federally enforceable emission caps are being modified by this modification. Federally enforceable emission caps are not being used to avoid major stationary source classification, as the source is already a major source of VOCs, and federally enforceable emission caps are not being used to avoid more stringent emission controls that would otherwise be required.
- (vi) projects involving emission sources subject to National Emission Standards for Hazardous Air Pollutants under 40 CFR 61, except for emission sources subject to 40 CFR Part 61 Subpart M - National Emission Standards for Hazardous Air Pollutants for Asbestos, Section 61.145, Standards for Demolition and Renovation (see Table 3 in Part 200 of this Title);
- No emission sources are being constructed which are subject to 40 CFR Part 61.
- (vii) projects involving the construction of new facilities with emission sources subject to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 (See Table 4 in Part 200 of this Title);
- **The project does not involve construction of a new facility with an emissions** source subject to 40 CFR Part 63.
- (viii) projects subject to title IV requirements under the CAA (see section 200 of this Title).
- No emission sources are being constructed which are subject to Title IV of the CAA.

6 NYCRR §201-6.6 (c) details when Minor Permit Modification procedures can be used. 6 NYCRR §201-6.6 (c)(1) states that Minor Permit Modification procedures may be used only for those permit modifications that do not exceed the criteria under subparagraphs (i) through (v). Those subparagraphs and a discussion of their applicability to this project are as follows:

- (i) Do not violate any applicable requirement.
- The use of additional loading arms for gasoline truck loading does not violate any applicable requirements.
- (ii) Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit and are not otherwise a significant change in the permit.



- The use of additional loading arms for gasoline truck loading does not trigger any changes to existing monitoring, reporting, or recordkeeping requirements in the permit. Also, it is not otherwise a significant change in the permit.
- (iii) Do not require or change a case-by-case determination of a Federal emission limitation or other Federal standard, or a specific determination for portable sources causing adverse ambient impacts, or a visibility or increment analysis.
- The use of additional loading arms for gasoline truck loading does not change or require a case-by-case determination of a Federal emission limitation or Federal standard.
- (iv) Do not seek to establish or change a permit term or condition that the facility has assumed to avoid an applicable requirement to which the emission source would otherwise be subject. Such terms and conditions include:
 - (a) a federally enforceable emissions cap assumed to avoid classification as a modification under any provision of title I of the act, including Part 231 of this Title; or
 - (b) an alternative emissions limit approved pursuant to the early reduction program under section 112 of the act.
- The use of additional loading arms for gasoline truck loading does not change or require an emissions cap.
- (v) Are not modifications under any provision of title I of the act resulting in an NSR major modification as defined and regulated under Part 231 of this Title.
- The use of additional loading arms for gasoline truck loading does not result in an NSR major modification.

An application for a minor permit modification should include the following information:

- (i) a description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
 - As previously stated, the modification consists of permitting two (2) additional loading bays for gasoline/ethanol loading at the existing eight (8) bay truck rack, for a total of five (5) gasoline/ethanol loading bays. Gasoline/ethanol is currently permitted to be loaded at three (3) of the eight (8) bays. After the proposed change gasoline/ethanol would be permitted to be loaded at five (5) of the eight (8) bays. There will be no associated throughput increase.
 - There will be a slight increase (110 lbs) in facility equipment fugitive emissions as a result of the additional valves, flanges, etc.
 - No new applicable requirements are triggered by the modification.
- (ii) certification by a responsible official, consistent with this Subpart, that the proposed modification meets the criteria contained herein for use of minor permit modification procedures and a request that such procedures be used;



- Global Companies LLC is certifying that the proposed modification meets the criteria contained herein for use of minor permit modification procedures and are requesting that such procedures are used.
- (iii) completed forms for use in notifying the administrator and affected states; and
- See attached application packet.
- (iv) the major facility's suggested draft permit in a format acceptable to the department.
- See attached annotated permit pages.

In support of this application, please find attached the following items:

- Relevant facility application forms for the modification
- Annotated permit

Should you have any questions please feel free to contact me at 518-453-2203 or NBrower@envirospeceng.com or Tom Keefe of Global at (781) 398-4132 or TKeefe@globalp.com.

Sincerely,



Nicole Brower, PE
Senior Engineer
Envirospec Engineering PLLC



Tom Keefe
VP EHS Operations
Global Partners LP



New York State Department of Environmental Conservation
Air Permit Application



Department of Environmental Conservation

DEC ID											
4	-	0	1	0	1	-	0	0	1	1	2

Application ID																	
4	-	0	1	0	1	-	0	0	1	1	2	/	0	0	0	2	9

Application Type	
State Facility	<input checked="" type="checkbox"/> Title V

Section I - Certification

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information required to complete this application, I believe the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Responsible Official Tom Keefe	Title Vice President, EHS
Signature	Date 5/31/2017

Professional Engineer Certification

I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments as they pertain to the practice of engineering. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Professional Engineer Nicole Brower, PE	NYS License No. 091076
Signature	Date 5/31/2017

Section II - Identification Information

Type of Permit Action Requested

<input type="checkbox"/> New	<input type="checkbox"/> Renewal	<input type="checkbox"/> Significant Modification	<input type="checkbox"/> Administrative Amendment	<input checked="" type="checkbox"/> Minor Modification
Application for the construction of a new facility		Application involves the construction of new emission unit(s)		

Facility Information

Name Global Companies, LLC - Albany Terminal
Location Address 50 Church Street - Port of Albany
* City / Town / Village Albany Zip 12202

Owner/Firm Information

Name Global Companies, LLC	Business Taxpayer ID 043443029		
Street Address 800 South Street			
City Waltham	State/Province MA	Country United States	Zip 02454
Owner Classification: <input type="checkbox"/> Federal <input type="checkbox"/> State <input type="checkbox"/> Municipal <input checked="" type="checkbox"/> Corporation/Partnership <input type="checkbox"/> Individual			

Owner/Firm Contact Information

Name Tom Keefe	Phone (781) 398-4132		
E-mail Address TKeefe@globalp.com	Fax (781) 398-9212		
Affiliation Global Companies, LLC	Title Vice President, EHS		
Street Address 800 South Street			
City Waltham	State/Province MA	Country United States	Zip 02454

Facility Contact Information

Name Chuck Furman	Phone (518) 445-1302		
E-mail Address CFurman@globalp.com	Fax (518) 436-6788		
Affiliation Global Companies, LLC	Title Terminal Manager		
Street Address 50 Church Street - Port of Albany			
City Albany	State/Province NY	Country United States	Zip 12202



DEC ID											
4	-	0	1	0	1	-	0	0	1	1	2

Project Description	Continuation Sheet(s)
<p>The purpose of this application is to permit two (2) additional loading bays for gasoline loading at the existing eight (8) bay truck rack, for a total of five (5) gasoline loading bays. Gasoline/ethanol is currently permitted to be loaded at three (3) of the eight (8) bays. After the proposed change gasoline/ethanol would be permitted to be loaded at five (5) of the eight (8) bays.</p>	

Section III - Facility Information

Facility Classification					
Hospital	Residential	Educational/Institutional	Commercial	Industrial	Utility

Affected States (Title V Applications Only)					
* Vermont	* Massachusetts	Rhode Island	Pennsylvania	Tribal Land: _____	
New Hampshire	* Connecticut	New Jersey	Ohio	Tribal Land: _____	

SIC Code(s)			NAICS Code(s)		
5171			424710		

Facility Description	Continuation Sheet(s)
<p>The facility is classified as a gasoline/ethanol/distillate/crude terminal consisting of storage tanks permitted for various products such as gasoline/ethanol, additive, and distillate. There is a truck loading rack with 10 bays, a railcar loading rack, a railcar offloading facility, and a marine loading dock. Gasoline/ethanol loading is controlled by a vapor recovery unit at the truck rack and vapor combustion units at the rail car rack and marine loading dock. Crude oil loading is also controlled by vapor combustion units at the marine loading dock.</p>	

Compliance Statements (Title V Applications Only)
<p>I certify that as of the date of this application the facility is in compliance with all applicable requirements. * Yes* No</p> <p>If one or more emission units at the facility are not in compliance with all applicable requirements at the time of signing this application (the 'NO' box must be checked), the noncomplying units must be identified in the "Compliance Plan" block on page 8 of this form along with the compliance plan information required. For all emission units at the facility that are operating <u>in compliance</u> with all applicable requirements, complete the following:</p> <ul style="list-style-type: none"> * This facility will continue to be operated and maintained in such a manner as to assure compliance for the duration of the permit, except those emission units referenced in the compliance plan portion of this application. * For all emission units subject to any applicable requirements that will become effective during the term of the permit, this facility will meet such requirements on a timely basis. * Compliance certification reports will be submitted at least once per year. Each report will certify compliance status with respect to each applicable requirement, and the method used to determine the status.

Facility Applicable Federal Requirements									Continuation Sheet(s)
Title	Type	Part	Subpart	Section	Subdivision	Paragraph	Subparagraph	Clause	Subclause
6	NYCRR	200		6					
6	NYCRR	201	6	5	a	7			
6	NYCRR	201	6	5	c				
6	NYCRR	201	6	5	c	2			

Facility State Only Requirements									Continuation Sheet(s)
Title	Type	Part	Subpart	Section	Subdivision	Paragraph	Subparagraph	Clause	Subclause
	ECL	19	0301						
	ECL	19	0301	3	b				
6	NYCRR	201	1	4					
6	NYCRR	211		2					

New York State Department of Environmental Conservation
Air Permit Application Form



DEC ID											
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Section III - Facility Information

Facility Description (continuation)

*Global Companies LLC received a Notice of Violation from the U.S. Environmental Protection Agency, dated July 29, 2016, alleging that emission increases associated with Global's project to allow/increase crude oil throughput at its Albany Terminal exceeded the significant modification threshold under the nonattainment New Source Review program. Global contests the allegations in the NOV and is working with EPA to resolve the matter. In addition, Global Companies LLC received a Warning Notice from DEC, dated October 20, 2016, stating that DEC had completed its review of a compliance emission testing report, dated August 7, 2013, for the Albany Terminal's marine vapor combustion unit (MVCU) (identified as VCUM2) and that alleged problems with the test prevented it from being used to demonstrate compliance with the MVCU's emission limit. Although Global contests key elements of the Warning Notice it has completed a compliance emission test in accordance with a department approved protocol. The preliminary results indicate the MVCU is in compliance with the permit; the final test report is pending.

New York State Department of Environmental Conservation
Air Permit Application Form



Department of
Environmental
Conservation

DEC ID											
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Section III - Facility Information

Facility Applicable Federal Requirements (continuation)									
Title	Type	Part	Subpart	Section	Subdivision	Paragraph	Subparagraph	Clause	Subclause
6	NYCRR	201	6	5	c	3	ii		
6	NYCRR	201	6	5	e				
6	NYCRR	202	2	1					
6	NYCRR	202	2	5					
6	NYCRR	215		2					
6	NYCRR	200		7					
6	NYCRR	201	1	7					
6	NYCRR	201	1	8					
6	NYCRR	201	3	2	a				
6	NYCRR	201	3	3	a				
6	NYCRR	201	6	5	a	4			
6	NYCRR	201	6	5	a	8			
6	NYCRR	201	6	5	d	5			
6	NYCRR	201	6	5	f	6			
6	NYCRR	202	1	1					
40	CFR	68							
40	CFR	82	F						
6	NYCRR	201	6						
6	NYCRR	201	7						
6	NYCRR	202	1	2					
6	NYCRR	202	1	3	a				
6	NYCRR	211		1					
6	NYCRR	212		2					
6	NYCRR	212		4	a				
6	NYCRR	212		10	c	4	i		
6	NYCRR	225	1	2	a	2			
6	NYCRR	225	1	8	b				
6	NYCRR	225	1	8	d				
6	NYCRR	225	3	3	a				
6	NYCRR	229		1	d	2	i		
6	NYCRR	229		1	d	2	iv		

Continuation Sheet ____ of ____

New York State Department of Environmental Conservation
Air Permit Application Form



Department of
Environmental
Conservation

DEC ID											
4	-	0	1	0	1	-	0	0	1	1	2

Section III - Facility Information

Facility Applicable Federal Requirements (continuation)									
Title	Type	Part	Subpart	Section	Subdivision	Paragraph	Subparagraph	Clause	Subclause
6	NYCRR	229		1	d	2	v		
6	NYCRR	229		3	a				
6	NYCRR	229		3	d				
6	NYCRR	229		3	e	1			
6	NYCRR	231	11	2	c				
40	CFR	60	A	4					
40	CFR	60	A	7	a - g				
40	CFR	60	A	8	a - f				
40	CFR	60	A	9					
40	CFR	60	A	11					
40	CFR	60	A	11	d				
40	CFR	60	A	12					
40	CFR	60	A	13					
40	CFR	60	A	14					
40	CFR	60	A	15					
40	CFR	60	Kb	113b	a				
40	CFR	60	Kb	115b	a				
40	CFR	60	Kb	116b					
40	CFR	60	XX	502	b				
40	CFR	60	XX	502	e				
40	CFR	60	XX	502	f				
40	CFR	60	XX	502	g				
40	CFR	60	XX	502	i				
40	CFR	63	BBBBBB	11081	a				
40	CFR	63	BBBBBB	11083	b				
40	CFR	63	BBBBBB	11087					
40	CFR	63	BBBBBB	11088					
40	CFR	63	BBBBBB	11089					
40	CFR	63	BBBBBB	11092	a				
40	CFR	63	BBBBBB	11092	a	2			
40	CFR	63	BBBBBB	11092	a	3			

Continuation Sheet ____ of ____

New York State Department of Environmental Conservation
Air Permit Application Form



DEC ID											
4	-	0	1	0	1	-	0	0	1	1	2

Section III - Facility Information

Facility Applicable Federal Requirements (continuation)									
Title	Type	Part	Subpart	Section	Subdivision	Paragraph	Subparagraph	Clause	Subclause
40	CFR	63	BBBBBB	11092	b	1	i	B	1
40	CFR	63	BBBBBB	11092	B	1	i	B	2
40	CFR	63	BBBBBB	11092	b	1	iii		
40	CFR	63	BBBBBB	11094	b - f				
40	CFR	63	BBBBBB	11095	a				
40	CFR	63	BBBBBB	11095	b				
40	CFR	63	BBBBBB	11098					
40	CFR	64							

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Department of
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Facility Compliance Certification Continuation Sheet(s)

Rule Citation									
Title	Type	Part	Subpart	Section	Subdivision	Paragraph	Subparagraph	Clause	Subclause
Applicable Federal Requirement			Capping	CAS Number		Contaminant Name			
State Only Requirement									

Monitoring Information

Work Practice Involving Specific Operations Ambient Air Monitoring Record Keeping/Maintenance Procedures

Compliance Activity Description

No Changes from Existing Permit Compliance Requirements

Work Practice Type	Code	Process Material		Reference Test Method	
		Code	Description		
Monitored Parameter			Manufacturer's Name/Model Number		
Code	Description				
Limit		Limit Units			
Upper	Lower	Code	Description		
Averaging Method		Monitoring Frequency		Reporting Requirements	
Code	Description	Code	Description	Code	Description

Facility Emissions Summary Continuation Sheet(s)

CAS Number	Contaminant Name	Potential to Emit (tons/yr)	Actual Emissions (pounds/yr)
0NY075 - 00 - 5	PM-10		
0NY750 - 02 - 5	PM-2.5		
007446 - 09 - 5	Sulfur Dioxide		
0NY210 - 00 - 0	Oxides of Nitrogen		
000630 - 08 - 0	Carbon Monoxide		
007439 - 92 - 1	Lead (elemental)		
0NY998 - 00 - 0	Total Volatile Organic Compounds		+ 110
0NY100 - 00 - 0	Total Hazardous Air Pollutants		
0NY750 - 00 - 0	Carbon Dioxide Equivalent		

New York State Department of Environmental Conservation
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Department of Environmental Conservation

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Section IV - Emission Unit Information

Emission Unit Description		Continuation Sheet(s)
Emission Unit	1 - R A C K 1	
<p>Eight (8) bay truck loading rack. Gasoline/ethanol is permitted to be loaded at five (5) of eight (8) bays, and distillate is permitted to be loaded at seven (7) of eight (8) bays.</p>		

Building Information					Continuation Sheet(s)
Building ID	Building Name	Length (ft)	Width (ft)	Orientation	

Emission Unit		Emission Unit Emissions Summary				Continuation Sheet(s)
-						
CAS Number	Contaminant Name					
	There are no changes to the Emission Unit Potential to Emit with this permit mod.					
ERP (lbs/yr)	Potential to Emit		Actual Emissions			
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)		
CAS Number	Contaminant Name					
ERP (lbs/yr)	Potential to Emit		Actual Emissions			
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)		
CAS Number	Contaminant Name					
ERP (lbs/yr)	Potential to Emit		Actual Emissions			
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)		
CAS Number	Contaminant Name					
ERP (lbs/yr)	Potential to Emit		Actual Emissions			
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)		

**New York State Department of Environmental Conservation
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**Department of
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Supporting Documentation and Attachments	
Required Supporting Documentation	Date of Document
List of Exempt Activities (attach form)	
Plot Plan	
Process Flow Diagram	
Methods Used to Determine Compliance (attach form)	
Emissions Calculations	
Optional Supporting Documentation	Date of Document
Air Quality Model	
Confidentiality Justification	
Ambient Air Quality Monitoring Plan or Reports	
Stack Test Protocol	
Stack Test Report	
Continuous Emissions Monitoring Plan	
Lowest Achievable Emission Rate (LAER) Demonstration	
Best Available Control Technology (BACT) Demonstration	
Reasonably Available Control Technology (RACT) Demonstration	
Toxic Impact Assessment (TIA)	
Environmental Rating Demonstration	
Operational Flexibility Protocol/Description of Alternate Operating Scenarios	
Title IV Permit Application	
Emission Reduction Credit (ERC) Quantification (attach form)	
Baseline Period Demonstration	
Use of Emission Reduction Credits (attach form)	
Analysis of Contemporaneous Emissions Increase/Decrease	
Other Supporting Documentation	Date of Document



Condition 21: Recycling and Emissions Reduction
Effective between the dates of 03/03/2011 and 03/02/2016

Applicable Federal Requirement: 40CFR 82, Subpart F

Item 21.1:

The permittee shall comply with all applicable provisions of 40 CFR Part 82.

The following conditions are subject to annual compliance certification requirements for Title V permits only.

Condition 22: Emission Unit Definition
Effective between the dates of 03/03/2011 and 03/02/2016

Applicable Federal Requirement: 6 NYCRR Subpart 201-6

Item 22.1(From Mod 4):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 1-RACK1

Emission Unit Description:

Truck loading rack with three gasoline/ethanol bays and five distillate bays.

Eight (8) bay truck loading rack. Gasoline/ethanol is permitted to be loaded at five (5) of eight (8) bays, and distillate is permitted to be loaded at seven (7) of eight (8) bays.

Item 22.2(From Mod 4):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 1-RACK2

Emission Unit Description:

Railcar loading rack with two loading positions for distillate and gasoline/ethanol.

Item 22.3(From Mod 4):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 1-RACK3

Emission Unit Description:

This emission unit represents marine loading of products at the dock.

Item 22.4(From Mod 4):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 1-RACK4

Emission Unit Description:

Rail spur for distillate loading.

Item 22.5(From Mod 4):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 1-TANKS

Emission Unit Description:



348 Northern Blvd, Suite 3
Albany, NY 12204
Phone: 518.453.2203
Fax: 518.453.2204
www.envirospeceng.com

June 19, 2017

Attn: Donald Welsted
NYSDEC Region 4
Division of Environmental Permits
1130 North Westcott Rd.
Schenectady, NY 12306-2014

Re: Global Companies LLC – Albany Terminal
Title V Facility Permit No. 4-0101-00112/00029
Minor Permit Modification – Gasoline Loading Rack; Supplemental Information

Dear Mr. Welsted,

On behalf of Global Companies LLC (Global), EnviroSpec Engineering, PLLC is submitting the attached supplemental information related to the application for a Minor Permit Modification submitted on **June 6, 2017** for Global's Albany Terminal, located at 50 Church Street, Albany, New York. The terminal currently operates under Title V Facility Permit No. 4-0101-00112/00029.

In support of the application, the following supplemental information is enclosed:

- Fugitive Equipment Emission Calculations

Should you have any questions please feel free to contact me at 518-453-2203 or NBrower@envirospeceng.com or Tom Keefe of Global at (781) 398-4132 or TKeefe@globalp.com.

Sincerely,

A handwritten signature in cursive script that reads "Nicole Brower".

Nicole Brower, PE
Senior Engineer
Envirospec Engineering PLLC

Project Count*				Light	Heavy	Gas		
Light	Heavy	Gas		Factor (lbs/hr)	Factor (lbs/hr)	Factor (lbs/hr)	Lbs/Hr	Lbs/Year
52	-	-	Valves	9.48E-05	9.48E-05	2.87E-05	0.00	4.3E+01
3	-	-	Pumps	1.19E-03	1.19E-03	1.43E-04	0.00	3.1E+01
-	-	-	Other	2.87E-04	2.87E-04	2.65E-04	0.00	0.0E+00
6	-	-	Loading Arm Valve	9.48E-05	9.48E-05	2.87E-05	0.00	5.0E+00
200	-	-	Flanges	1.76E-05	1.76E-05	9.26E-05	0.00	3.1E+01
							0.01	110.35

* Estimated

NOTE: Based on facility-specific equipment component counts. Emissions calculated per EPA guidance "Protocol for Equipment Leak Emission Estimates" (USEPA, November 1995).



349 Northern Blvd, Suite 3
Albany, NY 12204
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www.envirospeceng.com

January 11, 2019

Mr. Donald Welsted
NYSDEC Region 4
Division of Environmental Permits
1130 North Westcott Rd.
Schenectady, NY 12306-2014

Re: Global Companies LLC – Albany Terminal
Title V Facility Permit No. 4-0101-00112/00029
Minor Permit Modification – Burlington Rail Loading Rack

Dear Mr. Welsted,

On behalf of Global Companies LLC (Global), EnviroSpec Engineering, PLLC is submitting the attached application for a Minor Permit Modification at Global's Albany Terminal, located at 50 Church Street, Albany, New York. The terminal currently operates under Title V Facility Permit No. 4-0101-00112/00029.

The purpose of this application is to modify its permit to provide for the installation of eight (8) new loading arms and associated product and vapor piping at the Burlington Rail Loading Rack (1-RACK2). There are currently four (4) loading arms at the loading rack. Two (2) of the loading arms can be utilized to load individual railcars and the remaining two (2) loading arms can be utilized to load tank trains (tank trains consist of groups of 7 or 8 rail cars that are interconnected so that the railcars can be loaded as a unit from one loading position).

The modification will allow the operational flexibility to load of up to eight (8) individual railcars while also retaining the ability to load tank trains. A maximum of eight (8) loading arms will be in use at any one time. Although the project will result in an addition of loading arms at 1-RACK2, Global is not adding pumps or requesting to change any throughput caps so only fugitive emissions will increase because of this modification.

The requested change will only affect the emissions unit description found in the current permit on Page 20, Condition 22, which has been modified on the attached annotated permit page.

The addition of loading arms and piping qualifies as a minor modification under 6 NYCRR Part 621. As stated in 6 NYCRR §621.4 (g)(2), projects described in subparagraphs (i) - (ix) of Section (2) are major and all others are minor. The applicability of (i) – (ix) in relation to this project is addressed below:

(i) projects subject to the Title V facility permit requirements under Part 201 of this Title including: initial permitting of subject facilities, permit renewals and significant permit modifications;

- While the Global Albany Terminal is a Title V facility, the modification is not an initial Title V permit, nor a renewal, nor a significant permit modification, as defined in 6 NYCRR Part 201.

(ii) projects involving any preconstruction permit for construction and initial operation of new emission sources at Title V permitted facilities that are defined as significant permit modifications pursuant to Section 201-6.7(d) of this Title;

- The modification does not involve a preconstruction permit for construction and initial operation for a new emission source. The modification also does not involve construction of a new emission source that is defined as a significant permit modification under 6 NYCRR §201-6.7(d).

(iii) projects subject to major new source review permitting under Part 231 of this Title (new Source Review for New and Modified Facilities);

- The proposed modification does not trigger major new source review under Part 231.

(iv) projects requiring emission reduction credits;

- No emission reduction credits are required.

(v) projects requiring the use of a federally enforceable emission cap:

(a) to avoid major stationary source classification as defined in Part 201 of this Title; or

(b) to avoid more stringent emission controls that would otherwise be required for projects described under subparagraph (ii) above.

- No federally enforceable emission caps are being modified by this modification. Federally enforceable emission caps are not being used to avoid major stationary source classification, as the source is already a major source of VOCs, and federally enforceable emission caps are not being used to avoid more stringent emission controls that would otherwise be required.

(vi) projects involving emission sources subject to National Emission Standards for Hazardous Air Pollutants under 40 CFR 61, except for emission sources subject to 40 CFR Part 61 Subpart M - National Emission Standards for Hazardous Air Pollutants for Asbestos, Section 61.145, Standards for Demolition and Renovation (see Table 3 in Part 200 of this Title);

- No emission sources are being constructed which are subject to 40 CFR Part 61.

(vii) projects involving the construction of new facilities with emission sources subject to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 (See Table 4 in Part 200 of this Title);

- No emission sources are being constructed which are subject to 40 CFR Part 63.

(viii) projects subject to title IV requirements under the CAA (see section 200 of this Title).

- No emission sources are being constructed which are subject to Title IV of the CAA.

6 NYCRR §201-6.6 (c) details when Minor Permit Modification procedures can be used. 6 NYCRR §201-6.6 (c)(1) states that Minor Permit Modification procedures may be used only for those permit modifications that do not exceed the criteria under subparagraphs (i) through (v). Those subparagraphs and a discussion of their applicability to this project are as follows:

(i) Do not violate any applicable requirement.

- This modification does not violate any applicable requirements.

(ii) Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit and are not otherwise a significant change in the permit.



- This modification does not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit and are not otherwise a significant change in the permit
- (iii) Do not require or change a case-by-case determination of a Federal emission limitation or other Federal standard, or a specific determination for portable sources causing adverse ambient impacts, or a visibility or increment analysis.
- This modification does not change or require a case-by-case determination of a Federal emission limitation or Federal standard.
- (iv) Do not seek to establish or change a permit term or condition that the facility has assumed to avoid an applicable requirement to which the emission source would otherwise be subject. Such terms and conditions include:
 - (a) a federally enforceable emissions cap assumed to avoid classification as a modification under any provision of title I of the act, including Part 231 of this Title; or
 - (b) an alternative emissions limit approved pursuant to the early reduction program under section 112 of the act.
- This modification does not change or require an emissions cap.
- (v) Are not modifications under any provision of title I of the act resulting in an NSR major modification as defined and regulated under Part 231 of this Title.
- This modification does not result in an NSR major modification.

An application for a minor permit modification should include the following information:

- (i) a description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
 - As previously stated, the modification consists of the installation of new loading arms at the Burlington Rail Loading Rack (1-RACK2), as well as additional piping. Global is not requesting to change any loading limits as part of this modification and the existing pumps will be used. Only equipment fugitive emissions will increase as a result of additional valves, flanges, and connections.
 - This modification will not result in any new applicable requirements.
- (ii) certification by a responsible official, consistent with this Subpart, that the proposed modification meets the criteria contained herein for use of minor permit modification procedures and a request that such procedures be used;
 - Global Companies LLC is certifying that the proposed modification meets the criteria contained herein for use of minor permit modification procedures and are requesting that such procedures are used.
- (iii) completed forms for use in notifying the administrator and affected states; and



- See attached application packet.
- (iv) the major facility's suggested draft permit in a format acceptable to the department.
- See attached annotated permit pages.

In support of this application, please find attached the following items:

- Relevant facility application forms for the modification
- Annotated permit
- Emissions calculations

Should you have any questions please feel free to contact me at 518-453-2203 or GAiezza@envirospeceng.com or Tom Keefe of Global at (781) 398-4132 or TKeefe@globalp.com.

Sincerely,

Gianna Aiezza

Gianna Aiezza, PE
Principal Engineer
Envirospec Engineering PLLC



New York State Department of Environmental Conservation
Air Permit Application



Department of Environmental Conservation

DECID											
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Application ID																	
4	-	0	1	0	1	-	0	0	1	1	2	/	0	0	0	2	9

Application Type	
State Facility	<input checked="" type="checkbox"/> Title V

Section I - Certification

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information required to complete this application, I believe the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Responsible Official Tom Keefe	Title Vice President, EHS
Signature	Date 1/09/2019

Professional Engineer Certification

I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments as they pertain to the practice of engineering. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Professional Engineer Gianna Aiezza, P.E.	NYS License No. 081422
Signature	Date 1/11/19

Section II - Identification Information

Type of Permit Action Requested

<input type="checkbox"/> New	<input type="checkbox"/> Renewal	<input type="checkbox"/> Significant Modification	<input type="checkbox"/> Administrative Amendment	<input checked="" type="checkbox"/> Minor Modification
<input type="checkbox"/> Application for the construction of a new facility		<input type="checkbox"/> Application involves the construction of new emission unit(s)		

Facility Information

Name Global Companies, LLC - Albany Terminal	
Location Address 50 Church Street - Port of Albany	
* City / Town / Village Albany	Zip 12202

Owner/Firm Information

Name Global Companies, LLC	Business Taxpayer ID	
Street Address 800 South Street	0 4 3 4 4 3 0 2 9	
City Waltham	State/Province MA	Country United States Zip 02454
Owner Classification: <input type="checkbox"/> Federal	<input type="checkbox"/> State	<input type="checkbox"/> Municipal <input checked="" type="checkbox"/> Corporation/Partnership <input type="checkbox"/> Individual

Owner/Firm Contact Information

Name Tom Keefe	Phone (781) 398-4132
E-mail Address TKeefe@globalp.com	Fax (781) 398-9212
Affiliation Global Companies, LLC	Title Vice President, EHS
Street Address 800 South Street	
City Waltham	State/Province MA Country United States Zip 02454

Facility Contact Information

Name Chuck Furman	Phone (518) 445-1302
E-mail Address CFurman@globalp.com	Fax (518) 436-6788
Affiliation Global Companies, LLC	Title Terminal Manager
Street Address 50 Church Street - Port of Albany	
City Albany	State/Province NY Country United States Zip 12202

New York State Department of Environmental Conservation
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Project Description		<input type="checkbox"/> Continuation Sheet(s)
<p>The purpose of this application is to permit the installation of eight (8) new loading arms at the Burlington Rail Loading Rack (1-RACK2) for a total of eight (8) loading positions, as well as additional piping at the rack. This addition will allow for individual railcars to be loaded at 1-RACK2, currently entire tank trains are loaded. Global is not requesting to change any loading limits as part of this modification, and there are no changes to the 1-RACK2 instantaneous loading rate. Only equipment fugitive emissions will increase as a result of this modification.</p>		

Section III - Facility Information

Facility Classification					
<input type="checkbox"/> Hospital	<input type="checkbox"/> Residential	<input type="checkbox"/> Educational/Institutional	<input type="checkbox"/> Commercial	<input checked="" type="checkbox"/> Industrial	<input type="checkbox"/> Utility
Affected States (Title V Applications Only)					
<input checked="" type="checkbox"/> Vermont		<input checked="" type="checkbox"/> Massachusetts		Rhode Island	
New Hampshire		<input checked="" type="checkbox"/> Connecticut		New Jersey	
Pennsylvania		Ohio		Tribal Land: _____	
SIC Code(s)			NAICS Code(s)		
5171			424710		

Facility Description		<input type="checkbox"/> Continuation Sheet(s)
<p>The facility is classified as a gasoline/ethanol/distillate/crude terminal consisting of storage tanks permitted for various products such as gasoline/ethanol, additive, and distillate. There is a truck loading rack with 10 bays, a railcar loading rack, a railcar offloading facility, and a marine loading dock. Gasoline/ethanol loading is controlled by a vapor recovery unit at the truck rack and vapor combustion units at the rail car rack and marine loading dock. Crude oil loading is also controlled by vapor combustion units at the marine loading dock.</p>		

Compliance Statements (Title V Applications Only)
<p>I certify that as of the date of this application the facility is in compliance with all applicable requirements. * Yes* <input type="checkbox"/> No</p> <p>If one or more emission units at the facility are not in compliance with all applicable requirements at the time of signing this application (the 'NO' box must be checked), the noncomplying units must be identified in the "Compliance Plan" block on page 8 of this form along with the compliance plan information required. For all emission units at the facility that are operating in compliance with all applicable requirements, complete the following:</p> <ul style="list-style-type: none"> * This facility will continue to be operated and maintained in such a manner as to assure compliance for the duration of the permit, except those emission units referenced in the compliance plan portion of this application. * For all emission units subject to any applicable requirements that will become effective during the term of the permit, this facility will meet such requirements on a timely basis. * Compliance certification reports will be submitted at least once per year. Each report will certify compliance status with respect to each applicable requirement, and the method used to determine the status.

Facility Applicable Federal Requirements										<input checked="" type="checkbox"/> Continuation Sheet(s)
Title	Type	Part	Subpart	Section	Subdivision	Paragraph	Subparagraph	Clause	Subclause	
6	NYCRR	200		6						
6	NYCRR	201	6	5	a	7				
6	NYCRR	201	6	5	c					
6	NYCRR	201	6	5	c	2				

Facility State Only Requirements										<input type="checkbox"/> Continuation Sheet(s)
Title	Type	Part	Subpart	Section	Subdivision	Paragraph	Subparagraph	Clause	Subclause	
	ECL	19	0301							
	ECL	19	0301	3	b					
6	NYCRR	201	1	4						
6	NYCRR	211		2						

New York State Department of Environmental Conservation
Air Permit Application Form



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Section III - Facility Information

Facility Description (continuation)

*Global Companies LLC received a Notice of Violation from the U.S. Environmental Protection Agency, dated July 29, 2016, alleging that emission increases associated with Global's 2012 project to allow/increase crude oil throughput at its Albany Terminal exceeded the significant modification threshold under the nonattainment New Source Review program. Global contests the allegations in the NOV which remains pending.

New York State Department of Environmental Conservation
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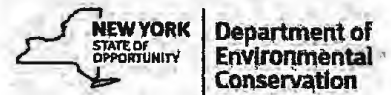


DEC ID											
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Section III - Facility Information

Facility Applicable Federal Requirements (continuation)									
Title	Type	Part	Sub-part	Section	Sub-section	Paragraph	Subparagraph	Clause	Sub-clause
6	NYCRR	201	6	5	c	3	ii		
6	NYCRR	201	6	5	e				
6	NYCRR	202	2	1					
6	NYCRR	202	2	5					
6	NYCRR	215		2					
6	NYCRR	200		7					
6	NYCRR	201	1	7					
6	NYCRR	201	1	8					
6	NYCRR	201	3	2	a				
6	NYCRR	201	3	3	a				
6	NYCRR	201	6	5	a	4			
6	NYCRR	201	6	5	a	8			
6	NYCRR	201	6	5	d	5			
6	NYCRR	201	6	5	f	6			
6	NYCRR	202	1	1					
40	CFR	68							
40	CFR	82	F						
6	NYCRR	201	6						
6	NYCRR	201	7						
6	NYCRR	202	1	2					
6	NYCRR	202	1	3	a				
6	NYCRR	211		1					
6	NYCRR	212		2					
6	NYCRR	212		4	a				
6	NYCRR	212		10	c	4	i		
6	NYCRR	225	1	2	a	2			
6	NYCRR	225	1	8	b				
6	NYCRR	225	1	8	d				
6	NYCRR	225	3	3	a				
6	NYCRR	229		1	d	2	i		
6	NYCRR	229		1	d	2	iv		

New York State Department of Environmental Conservation
Air Permit Application Form



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Section III - Facility Information

Facility Applicable Federal Requirements (continuation)									
Title	Type	Part	Subpart	Section	Subdivision	Paragraph	Subparagraph	Clause	Subclause
6	NYCRR	229		1	d	2	v		
6	NYCRR	229		3	a				
6	NYCRR	229		3	d				
6	NYCRR	229		3	e	1			
6	NYCRR	231	11	2	c				
40	CFR	60	A	4					
40	CFR	60	A	7	a - g				
40	CFR	60	A	8	a - f				
40	CFR	60	A	9					
40	CFR	60	A	11					
40	CFR	60	A	11	d				
40	CFR	60	A	12					
40	CFR	60	A	13					
40	CFR	60	A	14					
40	CFR	60	A	15					
40	CFR	60	Kb	113b	a				
40	CFR	60	Kb	115b	a				
40	CFR	60	Kb	116b					
40	CFR	60	XX	502	b				
40	CFR	60	XX	502	e				
40	CFR	60	XX	502	f				
40	CFR	60	XX	502	g				
40	CFR	60	XX	502	i				
40	CFR	63	BBBBBB	11081	a				
40	CFR	63	BBBBBB	11083	b				
40	CFR	63	BBBBBB	11087					
40	CFR	63	BBBBBB	11088					
40	CFR	63	BBBBBB	11089					
40	CFR	63	BBBBBB	11092	a				
40	CFR	63	BBBBBB	11092	a	2			
40	CFR	63	BBBBBB	11092	a	3			

**New York State Department of Environmental Conservation
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**Department of
Environmental
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DEC ID											
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Facility Compliance Certification Continuation Sheet(s)

Rule Citation									
Title	Type	Part	Subpart	Section	Subdivision	Paragraph	Subparagraph	Clause	Subclause
Applicable Federal Requirement			Capping	CAS Number		Contaminant Name			
State Only Requirement									

Monitoring Information

Work Practice Involving Specific Operations Ambient Air Monitoring Record Keeping/Maintenance Procedures

Compliance Activity Description

No changes from existing permit compliance requirements on the facility level.

Work Practice Type Code	Process Material		Reference Test Method		
	Code	Description			
Monitored Parameter			Manufacturer's Name/Model Number		
Code	Description				
Limit		Limit Units			
Upper	Lower	Code	Description		
Averaging Method		Monitoring Frequency		Reporting Requirements	
Code	Description	Code	Description	Code	Description

Facility Emissions Summary Continuation Sheet(s)

CAS Number	Contaminant Name	Potential to Emit (tons/yr)	Actual Emissions (pounds/yr)
0NY075 - 00 - 5	PM-10		
0NY750 - 02 - 5	PM-2.5		
007446 - 09 - 5	Sulfur Dioxide		
0NY210 - 00 - 0	Oxides of Nitrogen		
000630 - 08 - 0	Carbon Monoxide		
007439 - 92 - 1	Lead (elemental)		
0NY998 - 00 - 0	Total Volatile Organic Compounds		
0NY100 - 00 - 0	Total Hazardous Air Pollutants		
0NY750 - 00 - 0	Carbon Dioxide Equivalents		

New York State Department of Environmental Conservation
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4	-	0	1	0	1	-	0	0	1	1	2

Section IV - Emission Unit Information

Emission Unit Description										<input type="checkbox"/> Continuation Sheet(s)
Emission Unit	1	-	R	A	C	K	2			
Railcar loading rack.										

Building Information					<input type="checkbox"/> Continuation Sheet(s)
Building ID	Building Name	Length (ft)	Width (ft)	Orientation	

Emission Unit	Emission Unit Emissions Summary										<input type="checkbox"/> Continuation Sheet(s)
-											
CAS Number	Contaminant Name										
	There are no changes to the Emission Unit Potential to Emit with this permit mod. Changes to equipment fugitives only. There are no changes to the instantaneous loading rate and annual loading limits.										
ERP (lbs/yr)	Potential to Emit					Actual Emissions					
	(lbs/hr)		(lbs/yr)			(lbs/hr)		(lbs/yr)			
CAS Number	Contaminant Name										
ERP (lbs/yr)	Potential to Emit					Actual Emissions					
	(lbs/hr)		(lbs/yr)			(lbs/hr)		(lbs/yr)			
CAS Number	Contaminant Name										
ERP (lbs/yr)	Potential to Emit					Actual Emissions					
	(lbs/hr)		(lbs/yr)			(lbs/hr)		(lbs/yr)			
CAS Number	Contaminant Name										
ERP (lbs/yr)	Potential to Emit					Actual Emissions					
	(lbs/hr)		(lbs/yr)			(lbs/hr)		(lbs/yr)			

**New York State Department of Environmental Conservation
Air Permit Application**



**Department of
Environmental
Conservation**

DEC ID											
4	-	0	1	0	1	-	0	0	1	1	2

Emission Unit	Emission Point	Process	Emission Source	Emission Unit Applicable Federal Requirements							Continuation Sheet(s)			
				Title	Type	Part	Subpart	Section	Subdiv.	Parag.	Subparag.	Cl.	Subcl.	
No changes														

Emission Unit	Emission Point	Process	Emission Source	Emission Unit State Only Requirements							Continuation Sheet(s)			
				Title	Type	Part	Subpart	Section	Subdiv.	Parag.	Subparag.	Cl.	Subcl.	

Emission Unit Compliance Certification Continuation Sheet(s)

Rule Citation										
Title	Type	Part	Subpart	Section	Subdivision	Paragraph	Subparagraph	Clause	Subclause	

Applicable Federal Requirement			State Only Requirement				Capping			
Emission Unit	Emission Point	Process	Emission Source	CAS Number		Contaminant Name				

Monitoring Information

Continuous Emission Monitoring	Monitoring of a Process or Control Device Parameters as a Surrogate
Intermittent Emission Testing	Work Practice Involving Specific Operations
Ambient Air Monitoring	Record Keeping/Maintenance Procedures

Compliance Activity Description

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Work Practice Type Code	Process Material		Reference Test Method
	Code	Description	

Code	Monitored Parameter		Manufacturer's Name/Model Number
	Code	Description	

Limit		Limit Units	
Upper	Lower	Code	Description

Averaging Method		Monitoring Frequency		Reporting Requirements	
Code	Description	Code	Description	Code	Description

**New York State Department of Environmental Conservation
Air Permit Application**



**Department of
Environmental
Conservation**

DEC ID											
4	-	0	1	0	1	-	0	0	1	1	2

Supporting Documentation and Attachments	
Required Supporting Documentation	Date of Document
List of Exempt Activities (attach form)	
Plot Plan	
Process Flow Diagram	
Methods Used to Determine Compliance (attach form)	
× Emissions Calculations	
Optional Supporting Documentation	Date of Document
– Air Quality Model	
Confidentiality Justification	
Ambient Air Quality Monitoring Plan or Reports	
Stack Test Protocol	
Stack Test Report	
– Continuous Emissions Monitoring Plan	
Lowest Achievable Emission Rate (LAER) Demonstration	
Best Available Control Technology (BACT) Demonstration	
Reasonably Available Control Technology (RACT) Demonstration	
Toxic Impact Assessment (TIA)	
Environmental Rating Demonstration	
Operational Flexibility Protocol/Description of Alternate Operating Scenarios	
Title IV Permit Application	
Emission Reduction Credit (ERC) Quantification (attach form)	
Baseline Period Demonstration	
Use of Emission Reduction Credits (attach form)	
Analysis of Contemporaneous Emissions Increase/Decrease	
Other Supporting Documentation	Date of Document



Condition 21: Recycling and Emissions Reduction
Effective between the dates of 03/03/2011 and 03/02/2016

Applicable Federal Requirement:40CFR 82, Subpart F

Item 21.1:

The permittee shall comply with all applicable provisions of 40 CFR Part 82.

The following conditions are subject to annual compliance certification requirements for Title V permits only.

Condition 22: Emission Unit Definition
Effective between the dates of 03/03/2011 and 03/02/2016

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 22.1(From Mod 4):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 1-RACK1

Emission Unit Description:

Truck loading rack with three gasoline/ethanol bays and five distillate bays.

Item 22.2(From Mod 4):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 1-RACK2

Emission Unit Description:

Railcar loading rack with eight (8) loading positions for distillate and gasoline/ethanol.

Item 22.3(From Mod 4):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 1-RACK3

Emission Unit Description:

This emission unit represents marine loading of products at the dock.

Item 22.4(From Mod 4):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 1-RACK4

Emission Unit Description:

Rail spur for distillate loading.

Item 22.5(From Mod 4):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 1-TANKS

Emission Unit Description:

Project Count*				Light	Heavy	Gas		
Light	Heavy	Gas		Factor (lbs/hr)	Factor (lbs/hr)	Factor (lbs/hr)	Lbs/Hr	Lbs/Year
208	-	-	Valves	9.48E-05	9.48E-05	2.87E-05	0.02	1.7E+02
12	-	-	Pumps	1.19E-03	1.19E-03	1.43E-04	0.01	1.3E+02
-	-	-	Other	2.87E-04	2.87E-04	2.65E-04	0.00	0.0E+00
24	-	-	Loading Arm Valve	9.48E-05	9.48E-05	2.87E-05	0.00	2.0E+01
800	-	-	Flanges	1.76E-05	1.76E-05	9.26E-05	0.01	1.2E+02
* Estimated							0.05	441.40

NOTE: Based on facility-specific equipment component counts. Emissions calculated per EPA guidance "Protocol for Equipment Leak Emission Estimates" (USEPA, November 1995).

Tracking Details

1Z549V5R0197170741 [⊕ Add Description](#)

Updated: 02/07/2019 4:37 P.M. EST

Delivered



Delivered On
Monday
01/14/2019
Delivery Time
at 9:45 A.M.

[Send Updates](#)

[File a Claim](#)

Delivered To

1130 N WESTCOTT RD
SCHENECTADY, NY, 12306, US

Left At: Front Desk

Received By: JOE

[Proof of Delivery](#)

Shipment Progress ▼

Shipment Details ▲

Service
[UPS Next Day Air®](https://www.ups.com/content/us/en/shipping/time/service/next_day.html) (https://www.ups.com/content/us/en/shipping/time/service/next_day.html)

Weight
 0.50 LBS

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Global Companies LLC., 800 South Street, P.O. Box 9161, Waltham, MA 02454-9161 ph: 781-894-8800

December 11, 2019

Ms. Nancy Baker
Permit Administrator
NYSDEC Region 4
Division of Environmental Permits
1130 North Westcott Rd.
Schenectady, NY 12306-2014

USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866

Re: Global Companies LLC – Albany Terminal
Title V Facility Permit No. 4-0101-00112/00029
Off-Permit Change Notification

Dear Ms. Baker,

Global Companies LLC (Global), is submitting this notification for an off-permit change in accordance with 6 NYCRR 201-6.4(f)(6) at Global's Albany Terminal, located at 50 Church Street, Albany, New York. The terminal currently operates under Title V Facility Permit No. 4-0101-00112/00029.

This off permit change consists of adding one (1) distillate loading arm and one (1) ethanol loading arm to a bay at the truck loading rack. Two (2) loading pumps will also be replaced. There will be no change to permitted throughput. The change will not impact loading emissions, as fugitive emissions are controlled by a vacuum system. Equipment fugitives will increase by approximately 10 pounds annually from the addition of the two (2) loading arms, additional flanges and valves. The facility equipment counts will be updated accordingly.

Per Condition 1-11 of Global's Title V permit, and NYCRR 201-6.4(f)(6), the change qualifies for an off-permit change as follows:

201-6.4(f)(6): No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of Title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

The change at Global falls within this definition, as the loading rack is already permitted for distillate and ethanol loading. The additional loading arms will not violate applicable requirements or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Furthermore, the change is not a modification under any provision of Title I of the act and the change does not exceed the emissions allowable under the permit.


This notification serves as the notification required under NYCRR 201-6.4(f)(6)(i) as follows:

201-6.4(f)(6)(i) For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

The loading rack is already permitted to load both distillate and ethanol. Overall facility emissions will continue to remain below permitted facility emissions limits. The specified changes will occur no sooner than 7 days from the date of this notification.

Should you have any questions please feel free to contact Gianna Aiezza at Envirospec Engineering PLLC at 518-453-2203 or me at (781) 398-4132.

Sincerely,



Tom Keefe
VP Environmental, Health and Safety

cc: Gianna Aiezza, PE



349 Northern Blvd. Suite 3
Albany, NY 12204
Phone: 518.453.2203
Fax: 518.453.2204
www.envirospeceng.com

March 4, 2020

RECEIVED

Ms. Nancy Baker
Permit Administrator
NYSDEC Region 4
Division of Environmental Permits
1130 North Westcott Rd.
Schenectady, NY 12306-2014

MAR - 6 2020

BY: _____

USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866

Re: Global Companies LLC – Albany Terminal
Title V Facility Permit No. 4-0101-00112/00029
Off-Permit Change Notification

Dear Ms. Baker,

On behalf of Global Companies LLC (Global), Envirospec Engineering, PLLC is submitting this notification for an off-permit change in accordance with 6 NYCRR 201-6.4(f)(6) at Global’s Albany Terminal, located at 50 Church Street, Albany, New York. The terminal currently operates under Title V Facility Permit No. 4-0101-00112/00029.

This off-permit change consists of replacing the truck rack Vapor Recovery Unit (VRU) with a new VRU. There will be no change to permitted throughput. The change will not impact loading emissions, as fugitive emissions will still be controlled by a vacuum system. There will be no change in equipment fugitives.

Per Condition 1-11 of Global’s Title V permit, and NYCRR 201-6.4(f)(6), the change qualifies for an off-permit change as follows:

201-6.4(f)(6): No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of Title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

The change at Global falls within this definition, as the loading rack is already permitted for operation of a VRU. The new VRU will have the same control limit as the existing VRU. Also, the new VRU will not violate applicable requirements or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance

certification permit terms and conditions. Furthermore, the change is not a modification under any provision of Title I of the act and the change does not exceed the emissions allowable under the permit.

This notification serves as the notification required under 6 NYCRR 201-6.4(f)(6)(i) as follows:

201-6.4(f)(6)(i): For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

The loading rack is already permitted to operate a VRU. Overall facility emissions will continue to remain below permitted facility emissions limits. The specified change will occur no sooner than 7 days from the date of this notification. There are no permit terms or conditions that are no longer applicable as a result of the change.

Specifications for the new VRU are attached. The instantaneous loading rate will not increase with the new VRU.

Should you have any questions please feel free to contact me at 518-453-2203 or Tom Keefe of Global at (781) 398-4132.

Sincerely,



Gianna Aiezza, PE
Principal Engineer
Envirospec Engineering, PLLC

cc: Tom Keefe, Global



SECTION II**DESIGN BASIS**

MAR - 6 2020

The John Zink Carbon Adsorption-Absorption Hydrocarbon Vapor Recovery Unit design is based on proprietary technology, sound engineering practices, and data furnished by the customer and summarized as follows:

GENERAL PROJECT DESCRIPTION

VRU Model.....RSSEAA-N3080-1010-1210-39-0
 Application Type Truck
 Emission Control Requirement ⁽¹⁾ 2 mg/l
 Number of Lanes..... Seven (7)
 Maximum Number of Simultaneous Arms Twenty-five (25)
 Maximum Rate per Arm..... 550 gpm

VAPOR CHARACTERIZATION

Product(s) Loaded Gasoline (E10), distillates

Maximum Product Loading Profile

Instantaneous Rate of Loading/Filling, gpm..... 13,750
 Maximum 15-minute Throughput, gal 59,500
 Maximum 1-hour Throughput, gal 238,000
 Maximum 4-hour Throughput, gal 952,000
 Maximum 24-hour Throughput, gal 5,712,000

Vapor Growth Factor 1.0

Vapor Properties

Inlet Temperature Ambient
 Inlet Pressure Range ⁽²⁾ 0 - 12" w.c.g.
 Hydrocarbon Concentration Range..... 0 - 40.0 vol%
 Average Hydrocarbon Concentration for Design 23.0 vol%

ABSORBENT CHARACTERIZATION

Absorbent Type..... Gasoline
 Absorbent Source Storage Tank
 Seasonal Reid Vapor Pressures / Peak Operating Temperatures
 Summer 9.0 psia / 96°F
 Winter..... 11.0 psia / 84°F
 Design True Vapor Pressure..... 9.0 psia
 Specific Gravity at 60°F 0.74

Elizabeth Neznok

From: Welsted, Donald A (DEC) <donald.welsted@dec.ny.gov>
Sent: Friday, August 18, 2023 7:52 AM
To: Elizabeth Neznok
Cc: tkeefe@globalp.com; Gianna Aiezza
Subject: RE: Global Albany

Hi Elizabeth,

Let this email serve as a confirmation that I have received the application package via the file transfer service. Appreciated.

Regards,

Donald Welsted

Assistant Engineer, Division of Air – Region 4

New York State Department of Environmental Conservation

1130 N. Westcott Road, Schenectady, NY 12306-2014

P: (518) 357-2359 | F: (518) 357-2398 | donald.welsted@dec.ny.gov

www.dec.ny.gov |  | 

From: Elizabeth Neznok <eneznek@envirospeceng.com>
Sent: Thursday, August 17, 2023 4:15 PM
To: Welsted, Donald A (DEC) <donald.welsted@dec.ny.gov>
Cc: tkeefe@globalp.com; gaiezza@envirospeceng.com
Subject: Global Albany

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Hi Don,

The Global Albany air permit application with all the attachments was submitted through the file transfer service . Please let me know if you received it.

Thank you,
Elizabeth Neznok
Envirospec Engineering, PLLC
349 Northern Blvd, Suite 3
Albany, NY 12204
(518) 453-2203
eneznek@envirospeceng.com