

September 8, 2022

MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION

Bureau of Air Quality – Licensing Supervisor

17 State House Station

Augusta, Maine 04333-0017

RE: Gulf Oil Limited Partnership South Portland Terminal, Air Emission License Renewal Application, License No. A-000390-71-M-R(SM)

Dear Sir/Madam:

On behalf of Gulf Oil Limited Partnership (Gulf), Piper Consulting LLC submits herewith for your review and approval an air emission license renewal application for the above referenced license that was issued December 4, 2012. Additionally, the License had Amendment #1 issued October 19, 2016. This renewal application is being submitted to fulfill the ten year renewal requirement. A completed Chapter 115 Air Emission License Application Form is provided in Attachment A and a copy of the Public Notice dated September 1, 2022 from the Portland Press Herald is provided in Attachment B.

Requested Revisions to the Current License

- Tank Degassing in Summer Months - Item III.B.2. Inspection Requirements c. and Specific Conditions (16) Inspection Requirements C.

Currently internal floating roof tanks when storing gasoline or ethanol are restricted from the act of emptying and degassing for the purpose of performing a complete inspection between June 1st and August 31st of each calendar year.

Gulf acknowledges the promulgation of Chapter 170 for tank degassing that would allow emptying and degassing tanks for the purposes of performing maintenance and/or a complete inspection between June 1st and August 31st of each calendar year, as well as any other months of the year, provided that the vapors being degassed are controlled by a vapor processing system, such as a vapor combustion unit (or similar control device), and are not off gassed to the atmosphere prior to being controlled. Gulf requests that the Air License be modified to incorporate the requirements of Chapter 170.

- **Package Boilers - Item III.D.**

Currently the License lists the two Package Boilers as being designed to fire No. 2 Oil which triggers applicability to 40 CFR 63 Subpart JJJJJ and contains a summary of the applicable Compliance Dates, Notifications, and Work Practice Requirements.

Gulf has converted the two oil-fired package boilers to two natural gas-fired boilers in March 2015. Because natural gas boilers are exempt from Subpart JJJJJ, Gulf requests that the reference to applicability and associated compliance requirements be removed.

- **Annual Compliance Testing - Specific Conditions (24)**

The existing License requires annual compliance testing of the VRU controlling VOC emissions from the gasoline loading rack to show compliance with the emission limit of 10 mg/l prior to May 15th of each year. The many annual tests conducted to date have consistently shown an emission rate of less than 1 mg/l. Annual compliance testing is not a requirement of the federal regulations for gasoline terminals (both 40 CFR 63 Subpart R for major HAP sources and 40 CFR Subpart BBBBBB for nonmajor HAP sources). As a compromise, Gulf requests that the compliance testing be performed on a schedule of every 5 years. The confirmation of VRU compliance will be assessed by a CEM.

Proposed Compliance Certification

Because the VRU exhaust is now equipped with a continuous emission monitor (CEM), Gulf is requesting the Specific Condition (24) be removed from the Air License A-390-71-M-R (SM). A suggested replacement Condition would be:

(24) Monitor the VOC outlet emissions (in percent VOC as propane) from the VRU stack continuously utilizing a continuous emission monitor (CEM). Electronic interlocks and alarms shall be operated to prevent loading of gasoline whenever the hourly VOC emission limit of 10 mg/l is not maintained. Based on the VRU manufacturer's recommended correlation between mg/l and % VOC, interlocks shall be in place to cease gasoline loading at 0.95% VOC and a warning alarm shall be set for 0.75% VOC. The calibration of the CEM shall include a daily zero/span check, quarterly Cylinder Gas Audits (CGA) and an annual Relative Accuracy Test Audit (RATA). The CEM shall be operational no less than 90% of time per calendar quarter.

It is our understanding that there is no permit application fee associated with the air emission license renewal. If you have any questions, please do not hesitate to call me (978) 973-8673.

Sincerely,



Stephen Piper, P.E.
Principal, Air Quality Consultant
Piper Consulting LLC

Attachments:

- A. Chapter 115 Emission License Renewal Form
- B. Public Notice

Cc: Christopher Gill, Gulf Oil
Terry Sullivan, Gulf Oil
Tim Levanduski, Gulf Oil

Attachment A
Chapter 115 Emission License Renewal Form



Form No.	A-L-0006
Effective Date	12/2005
Revision No.	10
Last Revision Date	2/1/16
Page 1 of 13	

CHAPTER 115 AIR EMISSION LICENSE APPLICATION FORM

State of Maine
Department of Environmental Protection
Bureau of Air Quality
17 State House Station
Augusta, Maine 04333-0017
Phone: (207) 287-7688 Fax: (207) 287-7641

Section A: FACILITY INFORMATION

Owner or Operator (*Legal name as registered with the Secretary of State*):
Gulf Oil Limited Partnership

Facility Site Name: Gulf Oil Limited Partnership

Facility Site Address (*Physical, no post office boxes*): 175 Front Street

City/Town: South Portland Zip Code: 04106 County: Cumberland

Facility Description: Bulk Petroleum Distribution Terminal, SIC Code 5171

Application Description:

Renewal application for the Chapter 115 Air Emission License

Current License #: A- 390 - 71 - M - R

Check When Done:

All Sources

<input checked="" type="checkbox"/>	Application Completed
<input checked="" type="checkbox"/>	Copy Sent to Town (date sent: <u>9/8/2022</u>)
<input checked="" type="checkbox"/>	Public Notice Published <u>Portland Press Herald</u> paper name & date: <u>9/1/2022</u>
<input checked="" type="checkbox"/>	Enclosed Public Notice Tear Sheet
<input checked="" type="checkbox"/>	Signed Signatory Form (Section K)

Additional Requirements for New Sources

<input type="checkbox"/>	Schedule for construction or installation of equipment
<input type="checkbox"/>	Title, Right, or Interest (e.g. copy of deed or lease)
<input type="checkbox"/>	Check for Fee

Additional Requirements for New Major Sources and Major Modifications

<input type="checkbox"/>	Notify Abutting Landowners
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For Department Use

Application #: A- _____ - _____ - _____ - _____

App Track #: _____

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Facility Contact:

Name: Terry Sullivan Title: N.E. Regional Manager
Company: Gulf Oil Limited Partnership
Mailing Address: 175 Front Street

City/Town: South Portland State: ME Zip Code: 04106
Phone: (207) 799-5561 Fax:
e-mail: TSullivan@gulfoil.com

Application Contact:

Name: Christopher Gill Title: Director Environmental, Safety and Occupational Health
Company: Gulf Oil Limited Partnership
Mailing Address: 80 William Street
Suite 400
City/Town: Wellesley State: MA Zip Code: 02481
Phone: (508) 782-0127 Fax: (508) 270-6446
e-mail: cgill@gulfoil.com

Billing Contact:

Name: Christopher Gill Title: Terminal Compliance Manager
Company: Gulf Oil Limited Partnership
Mailing Address: 80 William Street
Suite 400
City/Town: Wellesley State: MA Zip Code: 02481
Phone: (508) 782-0127 Fax: (508) 270-6446
e-mail: cgill@gulfoil.com

Section B2: INTERNAL COMBUSTION ENGINES

(List equipment such as generators, diesel drive units, fire pumps, etc. Do not list wheeled mobile equipment such as loaders, backhoes, trucks, etc.)

Emission Unit ID	Serial Number	Maximum Design Heat Input Capacity (MMBtu/hr)	Maximum Output Capacity (kW or Hp)	Maximum Firing Rate (gal/hr)	Fuel Type	% Sulfur	Date of Manf	Date of Installation	Portable	Stationary	Spark Ignition Engines Only					
											2-Stroke	4-Stroke	Rich Burn	Lean Burn		
Generator #1 (Example)	123ABC456 (Example)	5.0 MMBtu/hr (Example)	512 kW (Example)	35.7 gal/hr (Example)	Diesel (Example)	0.0015% (Example)	1984 (Example)	1990 (Example)	X			X				
NA																

Does your facility participate in a Demand Response program in which the generator(s) may be operated for more than 15 hours per calendar year?

yes no

If yes, what units? _____

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Control Equipment for Fuel Burning Equipment

If applicable, indicate the types of required/operated add-on pollution control equipment, including baghouses, cyclones/multiclones, SCR, SNCR, etc.

Emission Unit	Type of Control	Pollutant Controlled	Control Efficiency
<i>Boiler #1 (Example)</i>	<i>Cyclone (Example)</i>	<i>PM (Example)</i>	<i>90% (Example)</i>
NA			

Monitors for Fuel Burning Equipment:

If applicable, indicate types of required/operated monitors, including Continuous Emission Monitors (CEM), Continuous Opacity Monitors (COM), parameter monitors for operational purposes, etc.

Emission Unit	Type of Monitor	Data Measured
<i>Boiler #1 (Example)</i>	<i>CEM (Example)</i>	<i>NO_x (Example)</i>
<i>Boiler #1 (Example)</i>	<i>Parameter – operational (Example)</i>	<i>Temperature (Example)</i>
NA		

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Section C: INCINERATORS

	Incinerator Unit 1	Incinerator Unit 2
Incinerator Type (medical waste, municipal, etc.)	NA	NA
Waste Type		
Make (Shenandoah, Crawford, etc.)		
Model Number		
Date of Manufacture		
Date of Installation		
Number of Chambers		
Max. Initial Charge	lb	lb
Max. Design Combustion Rate	lb/hr	lb/hr
Heat Recovery? (Yes or No)		
Retention Time of Exhaust Gases	seconds	seconds
Automatic Feeder? (Yes or No)		
Temperature Range Primary	to °F	to °F
Secondary	to °F	to °F
Auxiliary Burner - Primary Chamber max. rating (MMBtu/hr)		
type of fuel used		
Auxiliary Burner - Secondary Chamber max. rating (MMBtu/hr)		
type of fuel used		
Annual Waste Combusted for ____ (yr)		
Pollution Control Equipment (if any)		
Stack Number		
Monitors (ie - temperature recorder)		

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Section D: PROCESS EQUIPMENT

Emission Unit ID	Type of Equipment	Maximum Raw Material Process Rate (name and rate)	Maximum Finished Material Process Rate (name and rate)	Date of Manufacture	Date of Installation	Stack #	Control Device
<i>Kilns (Example)</i>	<i>Drying Kilns (Example)</i>	<i>N/A (Example)</i>	<i>25 MMBF/year (Example)</i>	<i>1990 (Example)</i>	<i>1990 (Example)</i>	<i>fugitive (Ex.)</i>	<i>none (Example)</i>
<i>PB#1 (Example)</i>	<i>Paint Booth (Example)</i>	<i>10 gal/hr (Example)</i>	<i>N/A (Example)</i>	<i>2001 (Example)</i>	<i>2001 (Example)</i>	<i>#4 (Ex.)</i>	<i>Paper Filters (Example)</i>
Rack	Gasoline Loading	7,600 gal/min	Same	1995	1995	VRU Stack #1	Vapor Recovery Unit
Rack	Distillate Loading	460 MMgal/yr	Same	1950	1950	Fugitive	None

Solvent Cleaners

(Also known as Parts Washers and/or Solvent Degreasers)

Emission Unit ID	Capacity (gallons)	Solvent Used	Solvent % VOC
<i>Degreaser #1 (Example)</i>	<i>15 (Example)</i>	<i>Kerosene (Example)</i>	<i>100% (Example)</i>
NA			

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PROCESS EQUIPMENT (section D cont'd)

Chemical Usage

Note: Complete this section for any chemicals integral to your process, for example, a cementing process for outsoles, dyes, surface coating, printing, cleaning, etc. Attach additional pages or MSDS sheets as needed.

Process	Chemical substance used in process	Actual Usage (gal or lb for yr)	Hazardous chemical(s) in substance	Percent VOC ¹ (%)	Percent HAP ² (%)	Total VOC emitted (lb/year)	Total HAP emitted (lb/year)
NA							

¹ Volatile Organic Compounds

² Hazardous Air Pollutants

Describe method of record keeping (ie. monthly calculations from purchase records, flow monitors on solvent tanks, etc.)

NA

Describe methods used to calculate VOC/HAP emitted (ie – test results, if control equipment was taken into account; if conditions exist where solvents remain in the substrate rather than complete volatilization, etc.)

NA

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Section E: STACK DATA

Stack #	Height Above Ground (ft)	Inside Diameter (ft)	Exit Temperature °F	Exhaust Flow Rate (ft ³ /s) [indicate actual or standard]
VRU	27ft	1 ft	67°F	

Section F: ANNUAL FACILITY FUEL USE

Total Fuel Consumption by Month for: 2021 (year)

Fuel type: Natural Gas

Fuel type: _____

Fuel type: _____

Avg % sulfur (oil) _____

Avg % sulfur (oil) _____

Avg % sulfur (oil) _____

Avg % moisture (wood) _____

Avg % moisture (wood) _____

Avg % moisture (wood) _____

(circle one: gal, tons, scf)

(circle one: gal, tons, scf)

(circle one: gal, tons, scf)

January 1,490
 February 1,507
 March 1,582
 April 729
 May 514
 June 210
 July 150
 August 117
 September 125
 October 364
 November 787
 December 1,174

Total 8,794

Proposed Annual Limit _____

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Section G: LIQUID ORGANIC MATERIAL STORAGE

Tank #	D1	D2	D3	D4	D5	D6
Capacity (gallons)	4,062,198	4,061,694	4,048,044	2,243,094	4,062,870	4,062,660
Materials Stored	Gasoline/Residual	Distillate/Residual	Gasoline/Residual	Distillate/Residual	Distillate/Residual	Distillate/Residual
Reid Vapor Pressure (RVP)	8,13		8,13			
Annual Throughput	10,489,874 (gal)	24,332,638 (gal)	10,175,818 (gal)	2,554,808 (gal)	2,077,824 (gal)	20,024,834 (gal)
Above or Below Ground?	Above	Above	Above	Above	Above	Above
Tank Type (floating or fixed, riveted or bolted, etc.)	Internal Floating/ bolted	Fixed	Internal Floating/ bolted	Fixed	Fixed	Fixed
Physical Description – year installed	1950	1950	1950	1950	1950	1950
Physical Description – color	White	White	White	White	White	White
Dimensions - height (ft)	48	48	48	48	48	48
Dimensions - Diameter (ft)	120	120	120	90	120	120
Construction Material	Steel	Steel	Steel	Steel	Steel	Steel
Control Device	Floating Roof/ Mechanical Shoe	None	Floating Roof/ Mechanical Shoe	None	None	None

Section H: MISCELLANEOUS

Note: Use this section to describe any equipment, activities, or other air emission sources that did not fit in any of the above categories. Include descriptions of the associated emissions. Attach additional pages if necessary.

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Section G: LIQUID ORGANIC MATERIAL STORAGE

Tank #	D7	D8	D9	D14		
Capacity (gallons)	3,247,062	5,985,840	767,466	6,000		
Materials Stored	Gasoline/Residual	Gasoline/Residual	Gasoline/Residual	Distillate/Residual		
Reid Vapor Pressure (RVP)	8,13	8,13	8,13			
Annual Throughput	11,403,395 (gal)	66,844,529 (gal)	7,332,251 (gal)	115,343 (gal)		
Above or Below Ground?	Above	Above	Above	Above		
Tank Type (floating or fixed, riveted or bolted, etc.)	Internal Floating/ bolted	Internal Floating/ bolted	Internal Floating/ bolted	Fixed		
Physical Description – year installed	1950	1950	1950	1990		
Physical Description – color	White	White	White	White		
Dimensions - height (ft)	44	45	36	16		
Dimensions - Diameter (ft)	110	150	60	8		
Construction Material	Steel	Steel	Steel	Steel		
Control Device	Floating Roof/ Mechanical Shoe	Floating Roof/ Mechanical Shoe	Floating Roof/ Mechanical Shoe	None		

Section H: MISCELLANEOUS

Note: Use this section to describe any equipment, activities, or other air emission sources that did not fit in any of the above categories. Include descriptions of the associated emissions. Attach additional pages if necessary.

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Section I: BPT/BACT AND OTHER ATTACHMENTS

BPT/BACT Analysis:

For a license renewal for existing equipment, the applicant is required to submit a Best Practical Treatment (BPT) analysis to the Department. A BPT analysis establishes what equipment or requirements are appropriate for control or reduction of emissions of regulated pollutants to the lowest possible level considering the existing state of technology, the effectiveness of available alternatives, and the economic feasibility.

For a new license or the addition of new equipment to an existing license, the applicant is required to submit a Best Available Control Technology (BACT) analysis. A BACT analysis is a top-down approach to selecting air emission controls. It is done on a case-by-case basis and develops emission limits based on the maximum degree of reduction for each pollutant emitted taking into account economic, environmental and energy impacts.

- I certify that, to the best of my knowledge, the control equipment, fuel limitations, and process constraints outlined in this application represent BPT / BACT for the equipment and processes listed.

OR

- I have attached a separate BPT / BACT analysis to this application.

Other Attachments:

Please list any other attachments included with this application.

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Section J: APPLICABLE RULES

Please indicate any rules you believe may be applicable to your facility by checking the associated box.

Citation	Title
✓ 06-096 CMR 101	Visible Emissions
06-096 CMR 103	Fuel Burning Equipment Particulate Emission Standard
06-096 CMR 104	Incinerator Particulate Emission Standard
06-096 CMR 105	General Process Source particulate Emission Standard
06-096 CMR 106	Low Sulfur Fuel Regulation
✓ 06-096 CMR 111	Petroleum Liquid Storage Vapor Control
✓ 06-096 CMR 112	Bulk Terminal Petroleum Liquid Transfer Requirements
06-096 CMR 117	Source Surveillance
06-096 CMR 118	Gasoline Dispensing Facilities Vapor Control
06-096 CMR 121	Emission Limitations and Emission Testing of Resource Recovery Facilities
06-096 CMR 123	Paper Coating Regulation
06-096 CMR 124	Total Reduced Sulfur Control from Kraft Mills
06-096 CMR 125	Perchloroethylene Dry Cleaner Regulation
06-096 CMR 126	Capture Efficiency Test Procedures
06-096 CMR 129	Surface Coating Facilities
06-096 CMR 130	Solvent Degreasers
06-096 CMR 131	Cutback Asphalt and Emulsified Asphalt
06-096 CMR 132	Graphic Arts – Rotogravure and Flexography
✓ 06-096 CMR 133	Petroleum Liquids Transfer Vapor Recovery at Bulk Gasoline Plants
06-096 CMR 134	Reasonably Available Control Technology for Facilities That Emit Volatile Organic Compounds
✓ 06-096 CMR 137	Emission Statements
06-096 CMR 138	Reasonably Available Control Technology for Facilities That Emit Nitrogen Oxides
06-096 CMR 140	Part 70 Air Emission License Regulations
06-096 CMR 145	NOx Control Program
06-096 CMR 153	Mobile Equipment Repair and Refinishing
06-096 CMR 159	Control of Volatile Organic Compounds from Adhesives and Sealants
06-096 CMR 161	Graphic Arts – Offset Lithography and Letterpress Printing
40 CFR Part 60	New Source Performance Standards (NSPS) (please list Subpart(s):)
✓ 40 CFR Part 63	National Emission Standards for Hazardous Air Pollutants (NESHAP) (please list Subpart(s): BBBBBB)
Other (list)	
Other (list)	

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Section K: SIGNATORY REQUIREMENT

Each application submitted to the Department must include the following certification signed by a Responsible Official*:

"I certify under penalty of law that, based on information and belief formed after reasonable inquiry, I believe the information included in the attached document is true, complete, and accurate."



Responsible Official Signature

Chris Gill

Responsible Official (Printed or Typed)

September 8, 2022

Date

Director Environmental, Safety and
Occupational Health

Title

* A Responsible Official is defined by MEDEP Rule, Chapter 100 as:

- A. For a corporation: a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
 - (1) The facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars); or
 - (2) The delegation of authority to such representatives is approved in advance by the permitting authority;
- B. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
- C. For a municipality, State, Federal, or other public agency: Either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of EPA).

Attachment B
Public Notice