

State of New Jersey

CHRIS CHRISTIE
Governor

DEPARTMENT of ENVIRONMENTAL PROTECTION

BOB MARTIN Commissioner

KIM GUADAGNO Lt. Governor Division of Air Quality
Bureau of Air Permits
401 E. State Street, 2nd floor, P.O. Box 420, Mail Code 401-02
Trenton, NJ 08625-0420

Air Pollution Control Operating Permit Significant Modification and Preconstruction Approval

Permit Activity Number: BOP130002 Program Interest Number: 51606

Mailing Address	Plant Location
JOE SOBIESKI	BUCKEYE PENNSAUKEN TERMINAL LLC
OPERATIONS MANAGER	123 Derousse Ave
Laurel Pipeline Company	Pennsauken Twp
3398 Garnet Mine Road	Camden County
Garnet Valley, PA 19060	

Initial Operating Permit Approval Date: April 9, 2001
Significant Modification Approval Date: August 21, 2014
Operating Permit Expiration Date: April 8, 2016

This significant modification is approved and issued under the authority of Chapter 106, P.L. 1967 (N.J.S.A. 26:2C-9.2). The equipment at the facility must be operated in accordance with the requirements of this permit.

This approval, in response to your application, merges the provisions of the previously approved operating permit and the changes from this significant modification into a single comprehensive permit that replaces the one previously issued. This significant modification is to approve the Alternative VOC Control Plan for the external Floating Roof tanks permitted under Emission Unit, U1.

Equipment at the facility referenced by this significant modification **is covered by** the permit shield, pursuant to the provisions of N.J.A.C. 7:27-22.17. Pursuant to N.J.A.C. 7:27-22.33(e), this significant modification consists of both a preconstruction approval and operating permit approval. This operating permit does not include compliance schedules as part of the approved compliance plan.

The permittee shall submit to the Department and to the EPA a periodic compliance certification, in accordance with N.J.A.C. 7:27-22.19. The certification shall be submitted electronically through the NJDEP online web portal – Periodic Compliance Certification service, and shall be certified pursuant to N.J.A.C. 7:27-1.39 by the responsible official. Access to DEP Online shall be obtained by following the instructions at: http://www.state.nj.us/dep/online/. The certification should be printed for submission to EPA. The schedule for compliance certifications set forth in the compliance plan in this operating permit. The annual compliance certification reporting period will cover the calendar year ending December 31. The annual compliance certification is due to the Department and the EPA within 60 days after the end of each calendar year during which this permit was in effect.

The annual compliance certification report may also be considered as your six month deviation report for the period from July 1 through December 31 which is due by January 30 of each year, as required by paragraph 13 in Section E, *General Provisions and Authorities*, of this permit, if the annual compliance certification is submitted by January 30.

New Jersey Department of Environmental Protection Air & Environmental Quality Compliance & Enforcement 401 East State Street, P. O. Box 422 Trenton, New Jersey 08625-0422 United States Environmental Protection Agency, Region II Air Compliance Branch 290 Broadway New York, New York 10007-1866 New Jersey Department of Environmental Protection Air and Environmental Quality Compliance & Enforcement Southern Regional Enforcement Office One Port Center 2 Riverside Drive, Suite 201 Camden, New Jersey 08103

Your facility's current approved operating permit and any previous versions (e.g. superseded, expired, or terminated) are now available for download in the PDF format at: http://www.nj.gov/dep/aqpp/. After accessing the website, click on "Approved Operating Permits" listed under "Reports" and then type in the Program Interested (PI) Number as instructed on the screen. A RADIUS file for your permit, containing Facility Specific Requirements (Compliance Plan), Inventories, and Compliance Schedules (if needed), can be obtained by contacting your permit writer. Upon importing this information into your personal computer with RADIUS software, you will have up-to-date information in RADIUS format. RADIUS software, instructions, and help are available at the Department's website at www.state.nj.us/dep/aqpp. We also have an Operating Permit Help Line available from 9:00 AM to 4:00 PM daily, where you may speak to someone about any questions you may have. The Operating Permit Help Line number is 609-633-8248.

If, in your judgment, the Department is imposing any unreasonable condition of approval in this permit_modification action, you may contest the Department's decision on the modification and request an adjudicatory hearing pursuant to N.J.S.A. 52:14b-1 et seq. and N.J.A.C. 7:27-22.32(a). All requests for an adjudicatory hearing must be received in writing by the Department within 20 calendar days of the date you receive this letter. The request must contain the information requested in N.J.A.C. 7:27-1.32 and the information on the enclosed Administrative Hearing Request Checklist and Tracking Form.

The permittee is responsible for submitting a timely and administratively complete operating permit renewal application. The Operating Permit Renewal Application consists of a RADIUS application and the Application Attachment available in Portable Document Format (PDF) and MS Word format at the Department's website http://www.nj.gov/dep/aqpp/applying.html (check Attachment to the RADIUS Operating Permit Renewal Application). Both the RADIUS application and the Application Attachment, along with any other supporting documents (saved on a CD) must be submitted with a cover letter (paper copy). The application is considered timely if it is received at least 12 months before the expiration date of the operating permit. To be deemed administratively complete, an application for renewal of the operating permit shall include all of the information required by the application form for the renewal and the information required pursuant to N.J.A.C. 7:27-22.30(d). However, consistent with N.J.A.C. 7:27-22.30(c), the permittee is encouraged to submit the renewal application at least 15 months prior to expiration of the operating permit, so that the Department can notify the applicant of any deficiencies in the application. This will allow the permittee to correct any deficiencies, and to better ensure that the application is administratively complete by the renewal deadline. Only applications which are timely and administratively complete will be eligible for coverage by an application shield.

Permittees that are subject to Compliance Assurance Monitoring (CAM), pursuant to 40 CFR 64, shall develop a CAM Plan for modified equipment as well as existing sources. Details of the rule and guidance on how to prepare a plan can be found at EPA's website: www.epa.gov/ttn/emc/cam.html. In addition, CAM Plans must be included as part of the permit renewal application. Permittees that do not submit a CAM Plan may have their modification applications denied, pursuant to N.J.A.C. 7:27-22.3.

If you have any questions regarding this permit approval, please call your permit writer, Anju Pejavara, at (609) 633-8241.

Approved by:

Max Friedman Bureau of Air Permits

Enclosure

CC: S. Riva, USEPA Region II

Date: 8/21/2014

New Jersey Department of Environmental Protection Facility Specific Requirements

Emission Unit: U1 Floating Roof Storage Tanks #2018, and #2019

Operating Scenario: OS Summary

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	The permittee shall paint and maintain the external surface of the tank white. [N.J.A.C. 7:27-16.2(b)1i]	None.	None.	None.
2	The tank shall be equipped with an External Floating Roof determined in accordance with the procedures specified in the Table 2A of N.J.A.C. 7:27-16.2. [N.J.A.C. 7:27-16.2(b)2]	None.	None.	None.
3	If the tank is equipped with gauging and/or sampling systems, such systems shall be vapor tight except when gauging or sampling is taking place.[N.J.A.C. 7:27-16.2(d)]	None.	None.	None.
4	Any tank installed on or after 12/17/1979 shall be equipped with a double seal floating roof. [N.J.A.C. 7:27-16.2(g)]	None.	None.	None.
5	Any person responsible for the emission of any applicable VOC from any storage tank pursuant to this section shall maintain, for each tank, records specifying each VOC stored and the vapor pressure of each VOC at standard conditions. [N.J.A.C. 7:27-16.2(k)]	Other: Tank Contents .[N.J.A.C. 7:27-16.2(k)].	Other: Log VOC stored, vapor pressure of each VOC stored at standard conditions, and storage period for each VOC stored annually. All records required to be kept or maintained shall be manually logged or kept in readily accessible computer files for a minimum of five years after collection and shall be made available to representative of the Department upon request.[N.J.A.C. 7:27-16.2(k)].	None.
6	VOC (Total): Maintain records for a period of no less than five years and shall make those records available upon request of the Department or EPA. [N.J.A.C. 7:27-16.22(a)]	None.	Other: All records required to be kept or maintained shall be manually logged or kept in readily accessible computer files annually for a minimum of five years after collection and shall be made available to representative of the Department upon request.[N.J.A.C. 7:27-16.22(a)].	None.

Date: 8/21/2014

New Jersey Department of Environmental Protection Facility Specific Requirements

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
7	VOC (Total) <= 7.45 tons/yr. Annual Emission Limit exclusive of degassing, cleaning, and refilling both tanks based on Minor modification Application for both tanks. [N.J.A.C. 7:27-22.16(a)]	Other: The annual emissions of VOCs and HAPs, in tons, for the tanks is determined using AP - 42, Tanks 3.0 or subsequent versions in future, and calculations for landing loses.[N.J.A.C. 7:27-22.16(o)].	Other: All records required to be kept or maintained shall be manually logged or kept in readily accessible computer files annually for a minimum of five years after collection and shall be made available to representative of the Department upon request.[N.J.A.C. 7:27-22.16(o)].	None.
8	The Permittee shall report any non-compliance of operating requirements directly related to emission limits, or any non-compliance specified in this conditions for this permit, in writing, within three working days after the event, to the Southern Regional Office. [N.J.A.C. 7:27-22.16(e)]	None.	None.	Submit a report: As per the approved schedule with in three working days. [N.J.A.C. 7:27-22.16(o)]
9	HAPs below reporting thresholds are Ethylebenzene, Xylene, Trimethylpentane (2-2-4), Toluene, Benzene, and Hexane. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
10	Permittee's combined annual throughput limit for two tanks #2018 and #2019 from Modification application = 277,015,310 gallons per year. [N.J.A.C. 7:27-22.16(a)]	Other: Monitored by tank gauging per occurrence[N.J.A.C. 7:27-22.16(o)].	Other: Recordkeeping by manually or electronic logging of throughput monthly during operations.[N.J.A.C. 7:27-22.16(o)].	None.
11	The following Floating Roof (FR) tanks are each limited to annual in-service roof landing VOC emissions of less than five (5) tons: TK#2018 and 2019. [N.J.A.C. 7:27-22.16(a)]	Monitored by calculations each month during operation using AP-42, Chapter 7 methodology. [N.J.A.C. 7:27-22.16(o)]	Recordkeeping by manual logging of parameter or storing data in a computer data system each month during operation. The permittee shall maintain the following records of each floating roof landing event: 1. tank contents before landing and after refilling; 2. landed height of the floating roof; 3. height of any liquid remaining in the bottom of the tank after landing; 4. duration of landing; 5. landing emissions calculated using AP-42, Chapter 7 methodology; and 6. any other records needed to create the Floating Roof Landing Emission Summary Report required at N.J.A.C. 7:27-21.5(j)2. [N.J.A.C. 7:27-22.16(o)]	None.

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New Jersey Department of Environmental Protection Facility Specific Requirements

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
12	Any floating roof tank subject to a Federally enforceable condition limiting its annual in-service roof landing (as defined at N.J.A.C. 7:27-16.1) VOC emissions to less than five tons as calculated by AP-42, Chapter 7 (November 2006 or later versions), may be exempt from the requirement at N.J.A.C. 7:27-16.2(p) to include that tank in a facility-wide tank VOC control plan to control in-service roof landing emissions. The permittee has chosen to apply this exemption to all tanks in this emission unit. [N.J.A.C. 7:27-22.16(o)]	None.	None.	None.
13	As per Buckeye's Alternate VOC Control Plan, Tank 2018 is not subject to doming requirements of N.J.A.C. 7:27-16.2(l)4. [N.J.A.C. 7:27-16.17(a)2]	None.	Other: The permittee shall maintain a copy of the Alternate VOC Control Plan.[N.J.A.C. 7:27-22.16(o)].	None.
14	The permittee shall equip tank 2019 with a domed roof before the tank is refilled after the first time the tank is degassed after May 19, 2009 but no later than May 1, 2020. [N.J.A.C. 7:27-16.2(1)4]	None.	None.	None.
15	The Alternate VOC Control Plan will expire in ten years from the date of approval of modification BOP130002. [N.J.A.C. 7:27-16.17(c)2]	None.	None.	Submit a plan: As per the approved schedule. The permittee shall submit a new Alternative VOC Control Plan at least one year prior to the expiration of the existing Alternative VOC Control Plan. [N.J.A.C. 7:27-16.17(c)5]