



February 11, 2020

Lynn Muzzey, Licensing Engineer
Maine Department of Environmental Protection
Bureau of Air Quality
17 State House Station
Augusta, Maine 04333-0017

Re: Application for Minor Revision
Global Companies LLC
1 Clark Road, South Portland, Maine
Air Emissions License: A-432-71-N-R (SM)
St.Germain File No.: 2600-1001

Dear Lynn,

On behalf of Global Companies LLC (Global), St. Germain is pleased to provide this letter as an application for a Minor Revision to the above referenced Air Emissions License issued to the South Portland terminal (Terminal). This Minor Revision application seeks to incorporate certain compliance requirements from the Consent Decree between the United States and Global (Civil Action No. 19-cv-00122) into Global's air emission license. This Minor Revision does not include any physical change to the Terminal's operations and does not alter any process or increase actual emissions from the Terminal.

Air License Revisions Imposed by Consent Decree

Global is submitting this application to the Maine Department of Environmental Protection (MEDEP) to revise the Terminal's air emission license to incorporate the following conditions:

- Global shall have no more than four heated bulk storage tanks containing either No. 6 oil or asphalt at the Terminal, no more than two of which shall contain No. 6 oil at any one time.
- Global shall not apply heat to the four heated bulk storage tanks for an aggregate of at least 120 non-heating days on a 12-month rolling basis. A non-heating day is any calendar day during which heat is not added to one of the four bulk storage tanks. Multiple non-heating days may accrue on any day where multiple heated bulk storage tanks are not heated on the same day, with each heated bulk storage tank that is not heated counting as a separate non-heating day.
- Global shall have throughput limitations of 50 million gallons per year (gpy) of No. 6 oil and 75 million gpy of asphalt, on a 12-month rolling basis.

In addition to the revisions requested pursuant to the Consent Decree, Global also seeks to impose throughput limitations on the distillate products stored at the Terminal.

Qualification as a Minor Revision

In order to qualify for Minor Revision procedures, the proposed changes to a facility's air license must be one or more of the following:

- 1) A correction of typographical errors;
- 2) Identification of an administrative change;
- 3) A change in monitoring and reporting requirements;
- 4) A licensed emissions increase under four tons per year (tpy) for any one regulated pollutant except Greenhouse Gasses (GHGs) and under eight tpy of total regulated pollutants, except for GHGs, and is determined not to be a Major or Minor Modification, and is subject to licensing as defined in Chapter 115 of the MEDEP regulations; or
- 5) Any other changes approved by the MEDEP that meet the criteria of a minor revision.

The proposed revisions qualify as a Minor Revision under the above criteria. The operational limits Global seeks to include constitute administrative changes. The proposed revisions do not increase the current emissions limitation of 21.9 tpy provided in the existing license. As the Consent Decree requires that Global operate a limited number of heated bulk storage tanks at any one time and no more than two tanks can contain No. 6 oil at any one-time, additional tracking/monitoring will be required. As the proposed minor revision is administrative in nature and does not require a process change or physical modifications to the Terminal, the proposed revisions meet the criteria of a minor revision.

Proposed Modified Language for License

Global proposes the following minor revisions as Specific Conditions to the Terminal's existing air license:

- 1) Tank Heating
 - a. Global shall operate no more than four heated bulk storage tanks containing either No. 6 oil or asphalt at the Terminal with no more than two of these heated bulk storage tanks containing No. 6 oil at any one time. A "Heated Bulk Storage Tank" shall mean a bulk storage tank with a shell capacity of greater than 30,000 gallons containing either No. 6 oil or asphalt.
 - b. Global shall not heat the four heated bulk storage tanks for an aggregate of at least 120 non-heating days on a 12-month rolling basis. A non-heating day is defined as any calendar day during which heat is not added to one of the four bulk storage tanks. Multiple non-heating days may accrue on any day where multiple heated bulk storage tanks are not heated on the same day, with each heated bulk storage tank that is not heated counting as a separate non-heating day.
 - c. Monitoring and Reporting – Global shall maintain a log of the heated tanks in service and the calendar days during which heat is added to any of the heated tanks. Such logs shall be maintained by Global and provided to MEDEP upon request.
- 2) Throughput Limitations
 - a. Throughput for No. 6 oil shall be limited to 50 million gpy and asphalt shall be limited to 75 million gpy of asphalt, on a 12-month rolling basis.

- b. Throughput for distillate products shall be limited to 150 million gpy on a 12-month rolling basis.

Global also proposes that Specific Condition 21.A of the existing air license be revised to note that the heated bulk storage tanks are included in the facility-wide emissions limitation:

21.A The facility wide emissions, including the boilers, hot oil heater, generator, distillate and heated bulk storage tanks, loading racks and vapor combustion unit shall not exceed 21.9 tons per year of VOC based on a 12-month rolling total.

Supplemental Measures

In addition to the minor revisions to the air emissions license described herein, Global will be installing supplemental measures to control odors (the "Equipment") on the vents of each heated bulk storage tank in service at the Terminal. Pursuant to the Maine air regulations (Maine Regulations 06 096 CMR 100 et seq.) and consistent with Global's discussions with MEDEP, the Equipment is not an emission control device. As shown in the schematic attached at Attachment A, Global will install and operate the Equipment, which includes a mist eliminator (required by the Consent Decree), and, in addition, dry scrubber and an exhaust fan. The Equipment will be operated in accordance with the manufacturers' recommended specifications.

Signatory Requirement

The completed Signatory Requirement, required for the Minor Revision, is provided as Attachment B.

Conclusion

Pursuant to the Consent Decree, Global proposes to incorporate the above specified measures into its air emission license. Incorporation of these measures require no physical changes to the Terminal's operations and will not result in an increase of actual licensed emissions but will add additional monitoring/tracking requirements to the license. As such, the proposed revisions qualify as a Minor Revision.

If you have any questions, please don't hesitate to contact me at 207-591-7000, ext. 13 or by email at miker@stgermain.com

Sincerely,
ST.GERMAIN

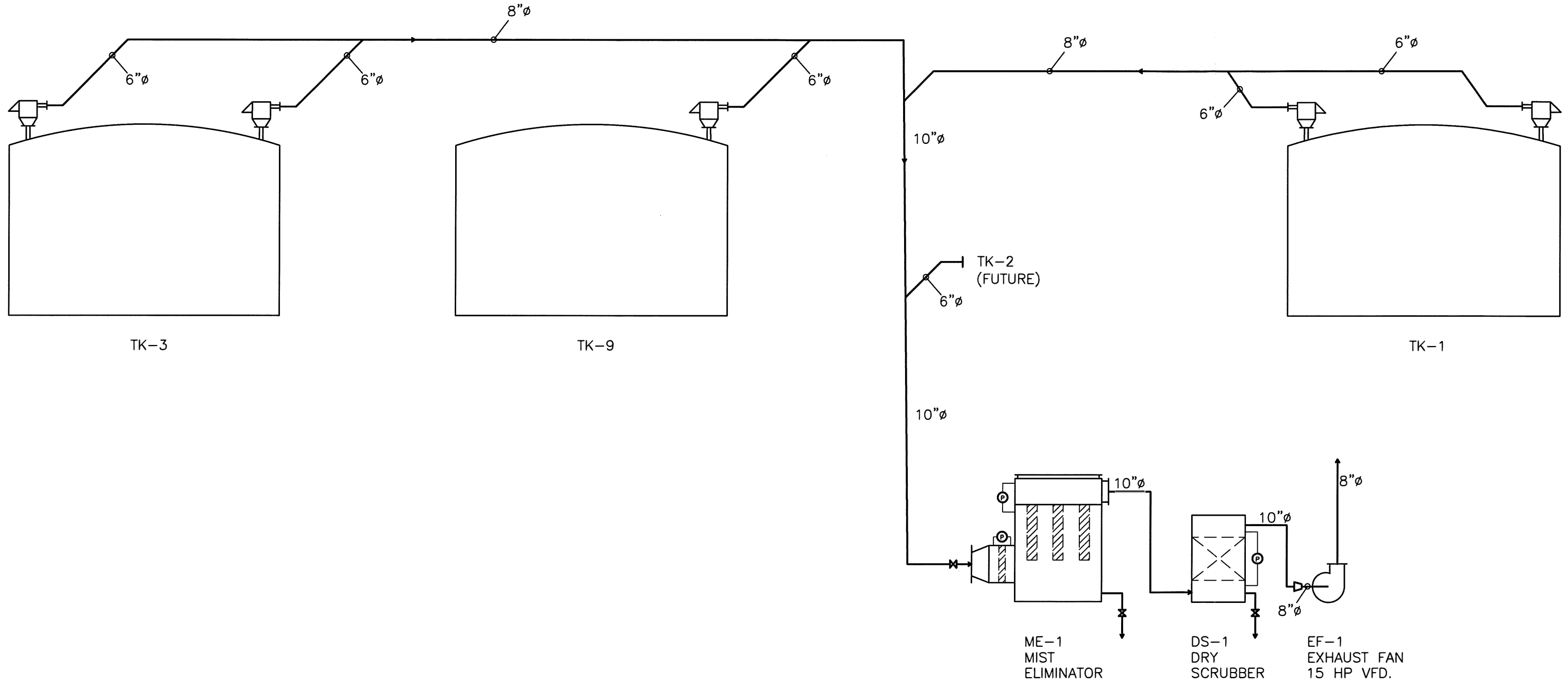


Mike Rioux
Certified Hazardous Materials Manager

ATTACHMENTS

cc: Jane Gilbert, MEDEP
Tom Keefe, Global Companies LLC
Bruce Yates, Global Companies LLC

ATTACHMENT A
ODOR CONTROL SCHEMATIC




NOTES

0	ISSUED FOR APPROVAL	10/09/19	JPX	
REV.		REVISION		DATE BY

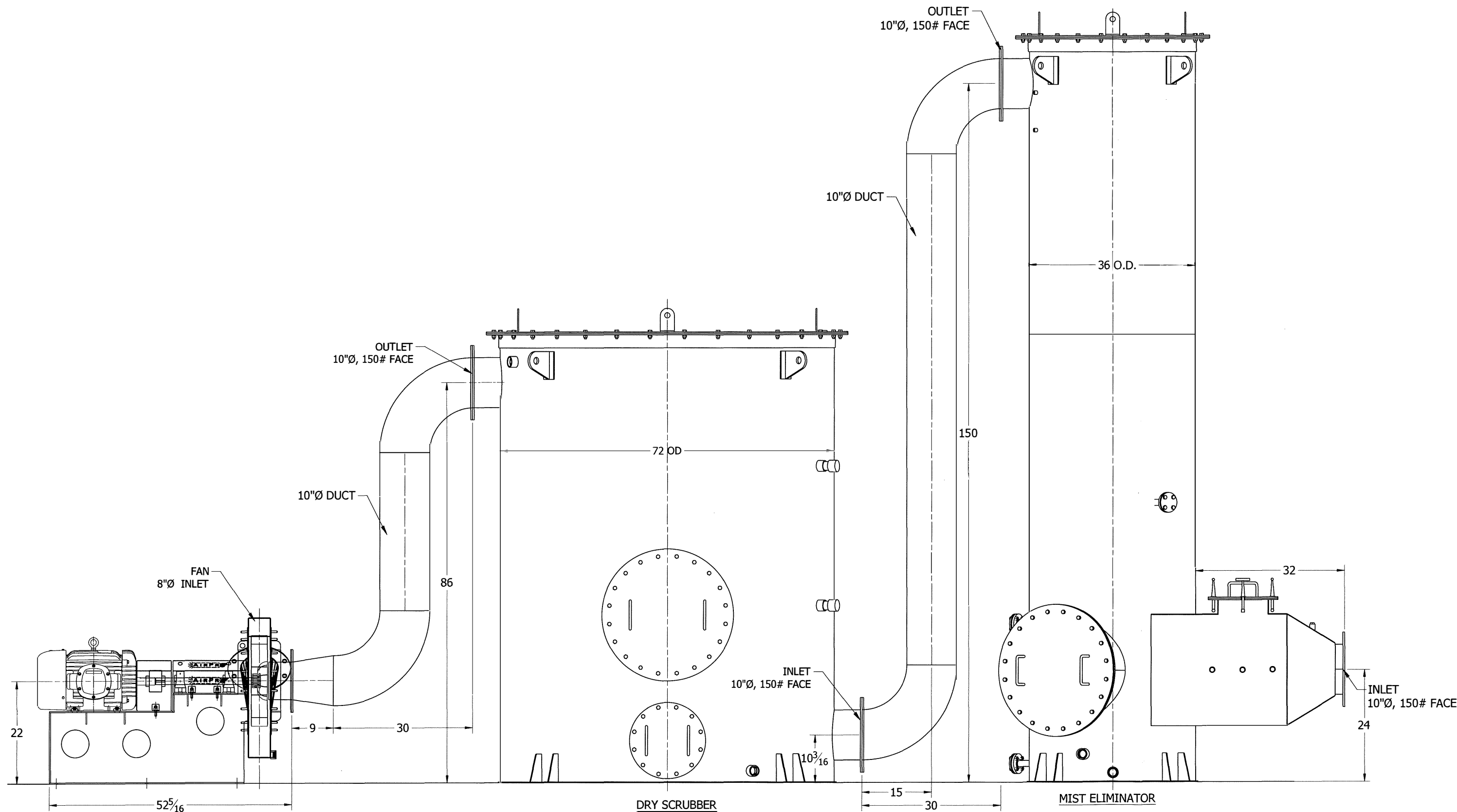
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CLIENT: GLOBAL PETROLEUM
 PROJECT: S. PORTLAND ODOR CONTROL
 SCALE: NTS
 DRAWN BY: ALK
 DATE: AUG. 19'
 TITLE: PFD



APPLIED CONTAMINANT CONTROL LTD.
 10908-123 STREET
 EDMONTON, ALBERTA
 CANADA T5M 0C9
 (780) 413-6934

DWG # 30764-PFD



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CLIENT: GLOBAL PETROLEUM
 PROJECT: S. PORTLAND ODOR CONTROL
 SCALE: ---
 DRNBY: JPX
 DATE: 10/07/19
 TITLE: ELEVATION VIEW
 S.O No. ---

APPLIED CONTAMINANT CONTROL LTD.
 10908 - 123 Street
 EDMONTON, ALBERTA
 CANADA T5M 0C9
 (780) 413-6934

DWG #30764-GA ELEVATION
 REV: 0

REV	DESCRIPTION	DATE	BY
0	ISSUED FOR CONSTRUCTION	10/09/19	JPX

ATTACHMENT B
SIGNATORY REQUIREMENT

Chapter 115 Air Emission License Application
State of Maine DEP - Bureau of Air Quality

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	2/11/2020 _____ Date
Thomas F. Keefe _____ Responsible Official (Printed or Typed)	VICE PRESIDENT Env Health & Safety _____ 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).