SUNOCO PARTNERS
MARKETING & TERMINALS
An ENERGY TRANSFER Partnership

VIA NJDEP ONLINE PORTAL

December 10, 2020

Mr. Yogesh Doshi
New Jersey Department of Environmental Protection
Bureau of Stationary Sources – Operating Permits Section
401 East State Street, 2nd Floor
Trenton, NJ 08625-420

Subject: **Sunoco Partners Marketing & Terminals, L.P. Newark Terminal**
Program Interest Number: 07733
Permit Activity Number: BOP160001
Title V Operating Permit Renewal Application

Dear Mr. Doshi,

Sunoco Partners Marketing & Terminals, L.P. (SPMT) hereby submits the enclosed application to renew the Title V Operating Permit for its facility in Essex County, New Jersey. The New Jersey Department of Environmental Protection ("NJDEP" or "the Department") approved the initial operating permit on April 8, 2002, and issued the latest modification to the currently valid operating permit on November 8, 2017 (BOP160001). The enclosures in this application include the RADIUS application file and the attachments described below. This Title V renewal application has been certified electronically through the NJDEP Online Portal.

The current operating permit expires on April 7th, 2022. According to N.J.A.C. 7:27-22.30(c), to be considered timely, administratively complete renewal applications must be received by the NJDEP at least 12 months prior to expiration of the Operating Permit, or by April 7th, 2021. SPMT is timely submitting this application, and will work with the Department should there be any deficiencies identified with this package so that the enclosed renewal application can qualify for an "application shield" pursuant to N.J.A.C. 7:27-22.7(b) prior to the renewal application administrative completeness deadline.

The application forms used in this submittal were obtained from the NJDEP Bureau of Stationary Sources website (http://www.state.nj.us/dep/aqpp/applying.html). The completed application forms are provided in **Attachment 1**. In accordance with Section 1 of the application forms, the Compliance Assurance Monitoring (CAM) plan for the truck loading rack venting to vapor recovery unit (VRU) CD1 for VOC controls (E1, U1 OS1) is included as **Attachment 2**. As referenced in paragraph 5 of the application requirements, and emissions summary that compares the potential HAP emissions from each source operation at the facility with the reporting thresholds listed in N.J.A.C. 7:27-17.9(a) is included as **Attachment 3**.

SPMT requests that the NJDEP provide written confirmation the application is administratively complete and the application shield applies. If you have any questions, please contact me at (856) 853-3155.

Sincerely,

Ron Rosendorn

Ron Rosendorn
Sr. Specialist - Environmental Compliance
Energy Transfer

Enclosures: Attachment 1 – Title V Renewal Application Forms
Attachment 2 – CAM Plan for Truck Loading Rack and VRU
Attachment 3 – Subchapter 17 HAP Emission Calculations
RADIUS Application File (Electronic)

Cc: Gregory Farrell
Jed Werner

Sunoco Partners Marketing & Terminals, L.P. (07733)

Date: 12/8/2020

New Jersey Department of Environmental Protection
Reason for Application

Permit Being Modified

Permit Class: BOP **Number:** 160001

Description of Modifications: This application is submitted to renew the Title V Operating Permit for Sunoco Partners Marketing & Terminals - Newark Terminal (PI 07733).

Please see the application package for additional information.

New Jersey Department of Environmental Protection
Facility Profile (General)

Facility Name (AIMS): Sunoco Partners Marketing & Terminals, L.P. **Facility ID (AIMS):** 07733

Street Address: SUNOCO PARTNERS MARKETING & TERMINALS LP
NEWARK TERMINAL
436 DOREMUS AVE
NEWARK, NJ 07105-4876

Mailing Address: RON ROSENDORN
1240 CROWN PT RD
WESTVILLE, NJ 08093

State Plane Coordinates:

X-Coordinate:	1,962,500
Y-Coordinate:	690,250
Units:	Other
Datum:	Unknown
Source Org.:	Other/Unknown
Source Type:	Approx. Addr. Match

County: Essex

Location Description: This facility is a petroleum bulk storage terminal located in Newark, New Jersey.

Industry:

Primary SIC:	
Secondary SIC:	
NAICS:	493190

New Jersey Department of Environmental Protection
Facility Profile (General)

Contact Type: **Air Permit Information Contact**

Organization: Sunoco Partners M&T, L.P.

Org. Type: LP

Name: Ron Rosendorn

NJ EIN:

Title: Sr. Envir. Spec.

Phone: (856) 853-3155 x

Fax: (866) 716-5154 x

Other: (610) 256-5643 x

Type: Mobile

Email: ronald.rosendorn@energytransfer.com

Mailing Address: 1240 Crown Point Road
Westville, NJ 08093

Contact Type: **Fees/Billing Contact**

Organization: Sunoco Partners M&T, L.P.

Org. Type: LP

Name: Ron Rosendorn

NJ EIN: 00000000000

Title: Sr. Envir. Spec.

Phone: (856) 853-3155 x

Fax: (866) 716-5154 x

Other: (610) 256-5643 x

Type: Mobile

Email: ronald.rosendorn@energytransfer.com

Mailing Address: 1240 Crown Point Road
Westville, NJ 08093

Contact Type: **Responsible Official**

Organization: Sunoco Partners M&T, L.P.

Org. Type: LP

Name: Gregory Farrell

NJ EIN:

Title: Terminal Manager

Phone: (973) 465-3200 x

Fax: (866) 699-1207 x

Other: ( ) - x

Type:

Email: gmfarrell@sunocologistics.com

Mailing Address: 436 Doremus Ave
Newark, NJ 07105-4876

Sunoco Partners Marketing & Terminals, L.P. (07733) Date: 12/8/2020

New Jersey Department of Environmental Protection
Facility Profile (Permitting)

1. Is this facility classified as a small business by the USEPA?	No
2. Is this facility subject to N.J.A.C. 7:27-22?	Yes
3. Are you voluntarily subjecting this facility to the requirements of Subchapter 22?	Yes
4. Has a copy of this application been sent to the USEPA?	No
5. If not, has the EPA waived the requirement?	No
6. Are you claiming any portion of this application to be confidential?	No
7. Is the facility an existing major facility?	Yes
8. Have you submitted a netting analysis?	No
9. Are emissions of any pollutant above the SOTA threshold?	No
10. Have you submitted a SOTA analysis?	No
11. If you answered "Yes" to Question 9 and "No" to Question 10, explain why a SOTA analysis was not required	
12. Have you provided, or are you planning to provide air contaminant modeling?	No

New Jersey Department of Environmental Protection
Division of Air Quality

Attachment to the RADIUS Air Operating Permit Renewal Application

Submittal Date: 12/14/2020

Facility Name: SUNOCO PARTNERS MKT & TERMINALS NEWARK PI#: 7733

This package must be submitted as an attachment to the RADIUS Air Operating Permit Renewal Application. The forms contained in this package must not be altered. Use of any non-standard forms will require resubmittal of the renewal application. If the file is too large to submit, please perform a Save As to optimize the file for Fast Web View using Adobe PDF software. Contact the Department if this does not solve the problem, and you still have issues submitting this package.

New Jersey Department of Environmental Protection
401 East State Street, 2nd Floor, P.O. Box 420, Mail Code 401-02, Trenton, NJ 08625-0420

Operating Permits Helpline 609-633-8248

Revised Apr 16, 2020

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Applying for an Air Operating Permit Renewal

This summary was prepared to assist you in renewing an operating permit. To continue lawful operation of a facility that has obtained an approved operating permit, a permittee must initiate the renewal of the operating permit by submitting a timely and administratively complete permit application. A complete operating permit renewal application consists of the RADIUS Air Operating Permit Renewal application forms and all forms contained in this package, along with any supporting documents (if needed).

1. **Timely**
   To be considered timely pursuant to N.J.A.C. 7:27-22.30(c), the Department must receive an administratively complete renewal application at least 12 months prior to expiration of the operating permit. The applicant is encouraged to voluntarily submit the renewal application at least 15 months prior to expiration of the operating permit, so that any deficiencies in the application can be addressed prior to the application due date. Only applications, which are administratively complete by the application deadline, will be eligible for coverage by an application shield.

2. **Administratively Complete**
   To be deemed administratively complete pursuant to N.J.A.C. 7:27-22.30(d), an operating permit renewal application must include all information requested in the RADIUS Air Operating Permit Renewal application forms and all forms contained in this package.

3. **Application Shield**
   The Department will grant an application shield when a timely and administratively complete application is received pursuant to N.J.A.C. 7:27-22.30(g). An application shield grants the right to operate the facility upon the expiration of its operating permit. If an operating permit has expired, the conditions of the operating permit remain enforceable until the operating permit is reissued. Unless a facility obtained an application shield, the right to operate the facility terminates upon the expiration of its operating permit pursuant to N.J.A.C. 7:27-22.30(i).

4. **Permit Changes During Renewal Process**
   Minor changes, such as those that would qualify for a seven-day-notice change or administrative amendment, may be made with the renewal pursuant to N.J.A.C. 7:27-22.30(d). Significant changes, such as those qualifying for a minor or significant modification, must be submitted as a separate permit application. The Department at its discretion may include approval of these proposed changes along with the approval of the renewal application.

5. **New HAP Reporting Thresholds**
   Pursuant to N.J.A.C. 7:27-22.30(l), for any operating permit expiring on or after February 12, 2021, HAP emissions from a source operation that equal or exceed the reporting threshold specified in N.J.A.C. 7:27-17.9(a) must be included during this operating permit renewal process. For any instance in which a HAP is being added or revised solely due to a change in the reporting threshold, the HAP(s) may be included by submitting emission calculations as an attachment to the renewal application. Otherwise, the HAP(s) must be included through the submittal of a permit modification application pursuant to N.J.A.C. 7:27-22.23 or N.J.A.C. 7:27-22.24 as applicable. If you are unsure how to proceed, please contact the Department at (609) 633-8248.

6. **Changes to Insignificant Source Operations**
   A permittee may, pursuant to N.J.A.C. 7:27-22.21(a), make certain changes to an insignificant source operation, or to the use thereof, without notifying the Department or EPA until the renewal of the operating permit. In the application for the renewal of the operating permit, the permittee shall identify any such changes which affect information in the operating permit. Such changes could include the addition or deletion of insignificant source operations that have occurred during the term of the operating permit. Additions and revisions to existing insignificant source operations shall be made by completing the Insignificant Source Emissions screen in RADIUS, while deletions shall be requested in the Reason for Application screen in RADIUS.

The forms contained in this attachment must not be altered. Use of any non-standard forms will require resubmittal of the renewal application.

Section 1
Compliance Requirements

A. Compliance Assurance Monitoring (CAM) Applicability Determination

EPA developed 40 CFR 64 (Compliance Assurance Monitoring or "CAM") in order to provide reasonable assurance that facilities comply with emission limitations by monitoring the operation and maintenance of their control devices. In general, CAM applies to emission units that meet all of the following conditions:

1. The emission unit is located at a major source for which a Title V permit is required;
2. The emission unit is subject to an emission limitation or standard for a specific contaminant;
3. The emission unit uses a control device to achieve compliance with that specific contaminant's federally enforceable limit or standard;
4. The emission unit has potential pre-control or post-control emissions (of that specific contaminant) of at least 100% of the major source amount (see 40 CFR 64.2 - "Major facility"); and
5. The emission unit is not otherwise exempt from CAM (for exemptions, see 40 CFR 64.2(b)).

To learn more about the CAM program and for guidance on how to prepare a CAM plan, check EPA's website: https://www.epa.gov/air-emissions-monitoring-knowledge-base/compliance-assurance-monitoring.

After reviewing the information above, check the following boxes as applicable:

☐ **NO**, my facility **does not** have any emission units subject to CAM requirements.

☑ **YES**, my facility **does** have one or more emission units subject to CAM requirements, and

- ☑ A CAM plan is provided with this operating permit renewal application.
- ☐ A CAM plan will be submitted during the technical review of this renewal application.

B. Health Risk Assessment

1. Consistent with N.J.A.C. 7:27-22.3(cc), the Department will review each operating permit renewal application to ensure that emissions of Hazardous Air Pollutants (HAPs) do not pose a public health risk.

2. After receipt of the renewal application, the Department will notify applicants if a Facility-Wide Risk Assessment must be performed. A plot plan and air dispersion modeling protocol will be required in that case.

3. Previous Facility-Wide Risk Assessment, additions and changes in toxicity values or standards, and changes in the air model and/or the facility's location (in an Environmental Justice area, near a sensitive population etc.) will determine the need for health risk assessment.

C. Acid Rain Program

To learn more about Acid Rain Program, check EPA's website: https://www.epa.gov/airmarkets/acid-rain-program.

Check the following boxes as applicable:

☑ **NO**, this facility **is not subject** to the Acid Rain Program, codified at 40 CFR 72.

☐ **YES**, this facility **is subject** to the Acid Rain Program, codified at 40 CFR 72, and

- ☐ There have been no changes affecting my facility's Acid Rain Permit and a renewal application is provided with this operating permit renewal application.
- ☐ There have been changes affecting my facility's Acid Rain Permit and a revised/updated application is provided with this operating permit renewal application.

D. N.J.A.C. 7:27-18 Netting Analysis and General Operating Permit Determination

Air permit applications requesting air emissions increases are required to include a netting analysis to determine if the resulting net emission increase at the facility constitutes a significant net emission increase pursuant to N.J.A.C. 7:27-18.7. These netting analyses must be kept on site or submitted to the Department consistent with the Department's guidance included in the memo listed under "N.J.A.C. 7:27-18 Netting Analysis" and the "General Procedures for General Operating Permits" on the Department's webpage http://www.state.nj.us/dep/aqpp/permitguide.html and http://www.state.nj.us/dep/aqpp/gop.html, respectively. The Department intends to review these analyses at least once in 5 years unless no permit modifications proposing emissions increases were made and no GOPs were obtained during the past 5-year permit term. All netting analyses corresponding to a modification to increase emissions or a GOP must be submitted to the Department. Any netting analyses submitted with a modification application during the 5-year permit term do not need to be submitted again with the permit renewal application.

Check the following boxes as applicable:

☑ **NO**, this facility **has not made** permit changes resulting in emissions increases, including GOPs, since the last permit renewal.

☐ **YES**, this facility **has made** permit changes resulting in emissions increases, including GOPs, since the last permit renewal, and

- ☐ One or more netting analyses, prepared consistent with N.J.A.C. 7:27-18.7 during this permit term, were provided with a modification application during the 5-year permit term.
- ☐ One or more netting analyses, prepared consistent with N.J.A.C. 7:27-18.7 during this permit term, are provided with this permit renewal application.
- ☐ One or more netting analyses, prepared consistent with N.J.A.C. 7:27-18.7 during this permit term, will be submitted during the technical review of this permit renewal application.

Attachment to the RADIUS Air Operating Permit Renewal Application

Section 2

Certification

No additional certification is required when submitting the operating permit renewal application through NJDEP Online: http://www.nj.gov/dep/online/.

Complete the information below when submitting the operating permit renewal application on an electronic storage device, through the mail. Click on the icon on the signature line to add an image of a signature saved on your computer. If you do not have one, print the form out and manually sign on the line.

Facility PI#: 7733

Facility Name: SUNOCO PARTNERS MKT & TERMINALS NEWARK

Responsible Official:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attached documents and, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant civil and criminal penalties, including the possibility of fine or imprisonment or both, for submitting false, inaccurate or incomplete information.

Name: Gregory Farrell **Signature:** _____ **Date:** 12/14/2020

Individuals with Direct Knowledge:

I certify under penalty of law that I believe the information provided in this document is true, accurate and complete. I am aware that there are significant civil and criminal penalties, including the possibility of fine or imprisonment or both, for submitting false, inaccurate or incomplete information.

Name: Ron Rosendorn **Signature:** _____ **Date:** 12/14/2020
Section Being Certified: All

Name: _____ **Signature:** _____ **Date:** _____
Section Being Certified: _____

Name: _____ **Signature:** _____ **Date:** _____
Section Being Certified: _____

Name: _____ **Signature:** _____ **Date:** _____
Section Being Certified: _____

The forms contained in this attachment must not be altered. Use of any non-standard forms will require resubmittal of the renewal application.

Section 3
Summary of 7-Day Notice Changes

Instructions
Complete this form if any 7-day notice changes were submitted to the NJDEP since the approval of the initial operating permit or most recent renewal thereof. With this information, the NJDEP will include the provisions of any eligible 7-day notice changes into the renewed permit.

No.	Date of 7-Day Notice	Brief Description of Change
		N/A

Section 4
Summary of the results from Stack Testing and Monitoring

Instructions
Complete this form if the permit required stack emissions testing, continuous emissions monitors or continuous opacity monitors.

Subject Item U / BP	OS / Ref #	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement	In Compliance?	
						Yes	No
U1	OS1/ Ref 2	VOC (Total) <= 10.8 lb/hr. [N.J.A.C. 7:27-22.16(a)]	VOC (Total): Monitored by stack emission testing prior to permit expiration date, based on the average of three Department validated stack test runs. [N.J.A.C 7:27-22.16 (o)]	VOC (Total): Recordkeeping by stack test results upon occurrence of event. [N.J.A.C. 7:27-22.16(o)]	Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. See the stack testing requirements in OS Summary. [N.J.A.C. 7:27-22.16(o)]	✓	
U1	OS1/ Ref 5	THC <= 6,200 ppmv measured as propane. [N.J.A.C. 7:27-22.16(a)]	THC: Monitored by continuous emission monitoring system continuously based on a 6-hour rolling average based on 60-minute blocks of continuous/non-continuous operation. Only data collected during loading of product in which the VRU is required to operate shall be included in the average for compliance purposes. [N.J.A.C.	THC: Recordkeeping by data acquisition system (DAS) / electronic data storage continuously. THC emissions shall be recorded for each 6-hour rolling block period, based on 60-minute blocks. [N.J.A.C. 7:27-16.3(t) 2]	Submit an Excess Emissions and Monitoring Systems Performance Report (EEMPR): On or before every April 30, July 30, October 30, and January 30 for the preceding calendar quarter (the calendar quarters begin on January 1, April 1, July 1, and October 1) electronically through the NJDEP online EEMPR web portal. [N.J.A.C.	✓	

Make additional copies of this form if needed.

Section 4
Summary of the results from Stack Testing and Monitoring

Instructions
Complete this form if the permit required stack emissions testing, continuous emissions monitors or continuous opacity monitors.

Subject Item U / BP	OS / Ref #	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement	In Compliance?	
						Yes	No
U1	OS1/ Ref 6	THC <= 10 mg/liter gasoline loaded. [N.J.A.C. 7:27-22.16 (a)]	THC: Monitored by stack emission testing prior to permit expiration date, based on the average of three Department validated stack test runs. [N.J.A.C. 7:27-22.16 (o)]	THC: Recordkeeping by stack test results upon occurrence of event. [N.J.A.C. 7:27-22.16 (o)]	Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. See the stack testing requirements in OS Summary. [N.J.A.C. 7:27-22.16(o)]	✓	
U1	CD1 / Ref 4	VOC Control Efficiency >= 95 %. [N.J.A.C. 7:27-22.16(a)]	VOC Control Efficiency: Monitored by stack emission testing prior to permit expiration date, based on the average of three Department validated stack test runs. [N.J.A.C. 7:27-22.16(o)]	VOC Control Efficiency: Recordkeeping by stack test results upon occurrence of event. [N.J.A.C. 7:27-22.16(o)]	Stack Test - Submit protocol, conduct test and submit results: As per the approved schedule. See the stack testing requirements in OS Summary. [N.J.A.C. 7:27-22.16(o)]	✓	

Make additional copies of this form if needed.

Section 5
Compliance Status

Instructions
Please read these instructions prior to completing the following form.

1. Subject Item: List each subject item from Section D, Compliance Plan and Inventories, of the operating permit in this column. Subject items include Facility (FC), Group (GR), Non-Source Fugitive Emissions (FG), Insignificant Source (IS), Batch Process (BP), and Emission Unit (U). (Operating Scenario and Reference Numbers are required only for Non-Compliance permit requirements. See item 2 below).

2. Compliance Status: Provide compliance status for each subject item in this column. If all the permit requirements for a subject item (for example an emission unit) are in compliance, write "In Compliance". If one or more permit requirements are out of compliance for a particular subject item, provide the Operating Scenario and Reference Number for each out of compliance requirement in the first column and write "Non-Compliance" in the 2nd column. (Reference Numbers for each applicable requirement are located in the first column of Facility Specific Requirements, Section D of the permit).

3. Method Used to Determine Compliance: Describe how compliance was determined in this column. If all the permit requirements for a subject item (for example an emission unit) are in compliance, write "Consistent with all methods listed in monitoring and recordkeeping permit requirements". If one or more permit requirements are out of compliance for a particular subject item, provide the Operating Scenario and Reference Number for each out of compliance requirement in the first column and provide specific method used to determine compliance in the 3rd column.

4. Compliance Schedule: insert a "No" if there are no compliance schedules included in this application to address non-compliance issues for which "Non-Compliance" was inserted in the 2nd column. Insert a "Yes" if a compliance schedule is included in this renewal application to address non-compliance issues in the approved permit or non-compliance issues disclosed in this application.

Section 5
Compliance Status

Instructions
Read the instructions on the previous page before completing this form.

Subject Item OS / Ref #	Compliance Status (In Compliance Non-Compliance)	Method Used to Determine Compliance	Is a Compliance Schedule Attached? (Yes/No)
Subject Item FC *OS / Ref #*	In Compliance	Consistent with all methods listed in monitoring and recordkeeping permit requirements	No
Subject Item IS3 *OS / Ref #*	In Compliance	Consistent with all methods listed in monitoring and recordkeeping permit requirements	No
Subject Item IS4 *OS / Ref #*	In Compliance	Consistent with all methods listed in monitoring and recordkeeping permit requirements	No

Make additional copies of this form if needed.

Section 5
Compliance Status

Instructions
Read the instructions on the previous page before completing this form.

Subject Item OS / Ref #	Compliance Status (In Compliance Non-Compliance)	Method Used to Determine Compliance	Is a Compliance Schedule Attached? (Yes/No)
Subject Item IS5 *OS / Ref #*	In Compliance	Consistent with all methods listed in monitoring and recordkeeping permit requirements	No
Subject Item GR1 *OS / Ref #*	In Compliance	Consistent with all methods listed in monitoring and recordkeeping permit requirements	No
Subject Item U1 *OS / Ref #*	In Compliance	Consistent with all methods listed in monitoring and recordkeeping permit requirements	No

Make additional copies of this form if needed.

Section 5
Compliance Status

Instructions
Read the instructions on the previous page before completing this form.

Subject Item OS / Ref #	Compliance Status (In Compliance Non-Compliance)	Method Used to Determine Compliance	Is a Compliance Schedule Attached? (Yes/No)
Subject Item U4 *OS / Ref #*	In Compliance	Consistent with all methods listed in monitoring and recordkeeping permit requirements	No
Subject Item U5 *OS / Ref #*	In Compliance	Consistent with all methods listed in monitoring and recordkeeping permit requirements	No
Subject Item U8 *OS / Ref #*	In Compliance	Consistent with all methods listed in monitoring and recordkeeping permit requirements	No

Make additional copies of this form if needed.

Section 5
Compliance Status

Instructions
Read the instructions on the previous page before completing this form.

Subject Item OS / Ref #	Compliance Status (In Compliance Non-Compliance)	Method Used to Determine Compliance	Is a Compliance Schedule Attached? (Yes/No)
Subject Item U9 *OS / Ref #*	In Compliance	Consistent with all methods listed in monitoring and recordkeeping permit requirements	No
Subject Item *OS / Ref #*			
Subject Item *OS / Ref #*			

Make additional copies of this form if needed.

Section 5
Compliance Schedules

Instructions
Complete this form if the permit included any compliance schedules (Section D of the permit) or if there are any non-compliance issues at the time of completing this application form. Check the appropriate box to indicate whether the compliance schedule has been updated, removed, or added.

Subject Item OS / Ref #	Requirement	Compliance Schedule	Compliance Schedule		
			Updated	Removed	Added
Subject Item N/A	N/A	N/A			
OS / Ref #					
Subject Item					
OS / Ref #					
Subject Item					
OS / Ref #					

Make additional copies of this form if needed.

The forms contained in this attachment must not be altered. Use of any non-standard forms will require resubmittal of the renewal application.

Sunoco Partners Marketing Terminals, L.P. - Newark Terminal (Program Interest Number 07733)

CAM ("Compliance Assurance Monitoring") Plan

	Indicator No. 1 Vapor Recovery Unit	Indicator No. 2 Vapor Collection System	Indicator No. 3 Vapor Collection System	Indicator No. 4 Vapor Recovery
I. Indicator	Carbon Bed Regeneration Vacuum	Equipment Leaks	Vapor Collection Line Back Pressure	Documentation of preventative maintenance
Measurement Approach	Vacuum Gauge	Monthly leak check of vapor recovery system. Each calendar month, the vapor collection system from the tanker truck to the Zink VRU will be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. The detection method will be sight, sound, or smell.	Pressure gauge reading when trucks are being loaded.	Proper VRU operation is verified by performing preventative maintenance as recommended by VRU manufacturer two times per year.
II. Indicator Range	An excursion is defined as when the vacuum gauge does not reach 25" of mercury or greater during a daily inspection or fails to hold at 25" or greater for at least 3 minutes during a weekly inspection. An excursion will trigger an investigation, corrective action, and a reporting requirement.	An excursion is defined as detection of a leak by sight, sound, or smell. An excursion will trigger an investigation, corrective action, and a reporting requirement. Leaks will be repaired within 15 days.	An excursion is defined as when the pressure gauge reading shows back pressure to be greater than 18" of water column. An excursion will trigger an investigation, corrective action, and a reporting requirement.	An excursion occurs if the preventative maintenance is not performed or documented.
Reporting Threshold	All excursions will be reported to the NJDEP in semi-annual monitoring reports.	All excursions and corrective actions taken shall be reported to the NJDEP in semi-annual monitoring reports.	All pressure gauge readings greater than 18 inches will be reported to the NJDEP in the semi-annual monitoring reports.	All excursions will be reported to the NJDEP in semi-annual monitoring reports.
III. Performance Criteria				
A. Data Representativeness	The vacuum gauge is located on the VRU piping, approximately 2 feet from the shell of each carbon bed vessel.	The terminal operations personnel will be trained on the procedures to detect leaks, record results, and initiate corrective actions.	A pressure gauge that is attached to a spool piece is inserted between the vapor line connection of the tanker and the connection for the terminal's vapor collection line measures back pressure. The gauge measures pressure within ± 0.1 inch of water column.	VRU operation verified by trained personnel or service person using a preventative maintenance checklist that is based on recommendations provided by the VRU manufacturer.
B. Verification of Operational Status	Daily visual check with manual log entry	N/A	Performed during stack testing events. Results to be displayed in test report.	N/A
C. QA/QC Practices and Criteria	Vacuum regeneration gauge receives preventative maintenance three times per year.	The operations' personnel responsible for performing the monthly inspections will be trained on the procedures to follow. The terminal will maintain a record of employees trained to perform the inspections.	Preventative maintenance and calibration is the responsibility of the testing company.	Service persons are trained on inspection and maintenance procedures.
D. Monitoring Frequency	The entire regeneration cycle will be monitored weekly. Twice daily when the VRU is in operation, the vacuum will be observed and recorded.	Monthly	Performed during stack testing events.	Preventative maintenance will be performed two times during a calendar year.
E. Data Collection Procedures	Weekly and daily visual reading when unit is in operation with manual log entry.	Results of inspections, leaks found and leaks repaired are recorded and kept on site.	Visual reading of gauge with manual entry.	Results of inspection and maintenance performed during preventative maintenance are manually recorded and maintained on site.
F. Averaging Period	N/A	None	None	N/A
Rationale for Selection of Performance Indicators	The most critical operating parameter that correlates to the performance of the carbon adsorber/absorber VRU at a bulk gasoline terminal is the carbon bed regeneration vacuum. During the regeneration cycle, the vacuum on the regenerating carbon bed should attain a vacuum of 27 inches of mercury. At a minimum, the vacuum must attain 25 inches and maintain the vacuum for at least three minutes. Once a week the entire regeneration cycle will be observed. On a daily basis the vacuum will be checked to verify that the 25 inches of mercury vacuum is achieved.	If there are leaks in the vapor collection system, the system may not collect all vapors and control at least 90 percent of all vapors from the loading rack.	If the back pressure in the vapor collection system exceeds 18 inches of water column, the pressure relief valves in the tank trucks and in the vapor collection pipeline may pop open to release vapors to the atmosphere. High back pressure in the vapor collection system will increase losses of vapor from any leaks that may be in the system.	To ensure that the Zink vapor recovery unit operates as designed, an inspection and preventative maintenance program is implemented. Inspections and preventative maintenance will be performed in accordance with recommendations by the unit manufacturer, Zink.

Newark Terminal Emission Unit HAP and VOC data

U1	Gasoline & Distillate Truck Loading Rack w/ Carbon Vapor Control Unit
U4	Horizontal Storage Tanks Storing Additives
U5	Internal Floating Roof Storage Tanks Storing Gasoline or Distillate
U8	Internal Floating Roof Tanks Storing Ethanol
U9	Pentane Transfer Hoses

Above Sub-17 Reporting Threshold

NJDEP Sub 17 Thresholds tons/year

Benzene	Cumene	Ethyl benzene	n-Hexane	Isooctane	Naphthalene	Toluene	Xylene
0.003	1	0.0095	1	0.5	0.0007	1	1

Gasoline & Distillate Truck Loading Rack w/ Carbon Vapor Control Unit

U1 Truck Loading HAP Potential Emissions (tons/yr)										
	VOC	Benzene	Cumene	Ethyl benzene	n-Hexane	Isooctane	Naphthalene	Toluene	Xylene	Total HAP
Gasoline Loading	24.9570	0.2805	0.0156	0.0352	0.3839	0.2612	0.0010	0.4740	0.2296	1.6811
Distillate Loading	2.0580	0.2274	0.0050	0.0212	0.0735	0.0000	0.0000	0.1211	0.1011	0.5493

Horizontal Storage Tanks Storing Additives

U4 Additive Storage HAP Potential Emissions (tons/yr)										
	VOC	Benzene	Cumene	Ethyl benzene	n-Hexane	Isooctane	Naphthalene	Toluene	Xylene	Total HAP
Tank-1	0.0547	0.0000	0.0000	0.0021	0.0000	0.0000	0.0000	0.0000	0.0095	0.0116
Tank-2	0.0085	0.0000	0.0000	0.0003	0.0000	0.0000	0.0000	0.0000	0.0015	0.0018
Total	0.0632	0.0000	0.0000	0.0024	0.0000	0.0000	0.0000	0.0000	0.0110	0.0134

Internal Floating Roof Storage Tanks Storing Gasoline or Distillate

U5 Internal Floating Roof Storage HAP Potential Emissions (tons/yr) Working & Standing Emissions Only										
	VOC	Benzene	Cumene	Ethyl benzene	n-Hexane	Isooctane	Naphthalene	Toluene	Xylene	Total HAP
Tank-24	3.528709	0.006556	0.00016035	0.001254612	0.0232771	0.023567	0.000196152	0.014662713	0.006519	0.076193
Tank-25	1.300998	0.00257	0.00011627	0.000761844	0.0088169	0.0099614	0.00018847	0.006830415	0.004094	0.033339
Tank-26	0.354504	0.00073	0.00004221	0.000262907	0.0024519	0.0029556	7.26559E-05	0.002127904	0.001428	0.010071
Tank-27	1.126505	0.002255	0.00011139	0.000715979	0.0076847	0.008871	0.000184877	0.006185838	0.003863	0.029872
Tank-36	0.619736	0.001453	0.00013569	0.000784999	0.004577	0.0065864	0.000252317	0.005288885	0.004333	0.023411
Tank-37	4.551093	0.008492	0.00021942	0.001684436	0.0300803	0.0306842	0.000278529	0.019230644	0.008782	0.099451
Tank-40	1.212508	0.002504	0.00014656	0.000910793	0.0083966	0.0101596	0.000252962	0.007333866	0.004949	0.034653
Tank-41	0.619566	0.001452	0.00013544	0.000783634	0.0045747	0.0065796	0.000251805	0.005281889	0.004325	0.023384
Tank-42	4.272851	0.007995	0.00021388	0.001622809	0.028278	0.0289885	0.000277429	0.018254255	0.008478	0.094108
Total	17.58647	0.034008	0.00128121	0.008782011	0.1181373	0.1283533	0.001955196	0.085196409	0.046772	0.424485

U5 Internal Floating Roof Storage HAP Potential Emissions (tons/yr) Roof Landing Emissions Only										
	VOC	Benzene	Cumene	Ethyl benzene	n-Hexane	Isooctane	Naphthalene	Toluene	Xylene	Total HAP
Tank-25	1.752488	0.003461	0.00015662	0.00102623	0.0118767	0.0134183	0.000253875	0.009200803	0.005515	0.04491
Tank-36	1.728113	0.004052	0.00037837	0.002188943	0.0127629	0.0183659	0.000703577	0.014747875	0.012082	0.06528
Tank-41	1.730632	0.004056	0.00037831	0.002188924	0.0127786	0.0183787	0.000703366	0.014753895	0.012082	0.06532
Tank-42	1.192032	0.00223	0.00005967	0.00045273	0.00788896	0.00808717	0.00007740	0.00509254	0.002365	0.02625
Total	6.403266	0.0138	0.00097298	0.005856825	0.0453071	0.0582501	0.001738215	0.043795111	0.032045	0.201765

U5 Internal Floating Roof Storage HAP Potential Emissions (Lbs/hr) Roof Landing Emissions Only										
	VOC	Benzene	Cumene	Ethyl benzene	n-Hexane	Isooctane	Naphthalene	Toluene	Xylene	Total HAP
Tank-25	146.0407	0.288437	0.01305207	0.085519143	0.9897262	1.1181901	0.021156268	0.766733564	0.459602	3.74242
Tank-36	144.0094	0.337669	0.03153114	0.182411933	1.0635727	1.5304937	0.058631408	1.228989545	1.006865	5.44016
Tank-41	144.2193	0.338016	0.03152621	0.182410348	1.0648839	1.5315577	0.058613874	1.229491228	1.006822	5.44332
Tank-42	99.33603	0.185873	0.00497222	0.037727351	0.6574129	0.673931	0.006449715	0.424378245	0.197105	2.18785
Total	533.6055	1.149995	0.08108164	0.488068775	3.7755957	4.8541725	0.144851265	3.649592582	2.670394	16.81375

U5 Internal Floating Roof Storage HAP Potential Emissions (tons/yr) Tank Cleaning Emissions Only										
	VOC	Benzene	Cumene	Ethyl benzene	n-Hexane	Isooctane	Naphthalene	Toluene	Xylene	Total HAP
Tank-41	3.9742	0.009315	0.00086876	0.005026616	0.0293446	0.0422046	0.001615201	0.033880644	0.027745	0.15000
Tank-42	3.9742	0.007436	0.00019893	0.001509382	0.0263015	0.0269624	0.000258038	0.016978372	0.007886	0.08753
Total	7.9484	0.016751	0.00106768	0.006535998	0.0556462	0.069167	0.001873239	0.050859015	0.03563	0.23753

U5 Internal Floating Roof Storage HAP Potential Emissions (Lbs/hr) Tank Cleaning Emissions Only										
	VOC	Benzene	Cumene	Ethyl benzene	n-Hexane	Isooctane	Naphthalene	Toluene	Xylene	Total HAP
Tank-41	165.5917	0.388108	0.03619818	0.209442324	1.2226925	1.7585242	0.067300052	1.411693483	1.156027	6.24999
Tank-42	165.5917	0.309848	0.00828862	0.062890928	1.0958975	1.1234328	0.010751578	0.707432156	0.328571	3.64711
Total	331.1833	0.697956	0.0444868	0.272333251	2.3185899	2.881957	0.078051631	2.119125639	1.484598	9.897098

Internal Floating Roof Tanks Storing Ethanol

U8 Ethanol Storage HAP Potential Emissions (tons/yr)										
	VOC	Benzene	Cumene	Ethyl benzene	n-Hexane	Isooctane	Naphthalene	Toluene	Xylene	Total HAP
Tank-5001	0.1187	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Tank-5002	0.1614	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.2800	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

Pentane Transfer Hoses

U9 Pentane Truck Off Loading Fugitive HAP Potential Emissions (tons/yr)										
	VOC	Benzene	Cumene	Ethyl benzene	n-Hexane	Isooctane	Naphthalene	Toluene	Xylene	Total HAP
Pentane Hoses	0.0900	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000