



**STATE OF CONNECTICUT
DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION
OFFICE OF ADJUDICATIONS**

IN THE MATTER OF : **APPLICATION NO. 202001530**
BUCKEYE PT TERMINALS, LP. : **DECEMBER 12, 2023**

HEARING OFFICER REPORT

**I.
PETITION FOR HEARING**

On November 17, 2022, the Office of Adjudications received a petition for a “public hearing” on the application filed by the Buckeye PT Terminals, LP (Buckeye) pursuant to relevant statutes and regulations for a Title V permit. The petitioner agreed to an informational hearing, and this report summarizes the public process that ensued in this matter.

**II.
HEARING AND COMMENTS**

The informational public hearing occurred on September 12, 2023, at 6:00 PM at the New Haven City Hall and via the Zoom platform. Presentations were made by Buckeye and the Department of Energy and Environmental Protection (DEEP) on the proposed work and how that work will be conducted within environmental standards. Public comments followed and the deadline for written comments was September 22, 2023. On November 28, 2023, DEEP staff issued a Comment Response Memorandum, which can be found attached to this report (hereinafter “Attachment I”).



III. CONCLUSION

This is not a contested case, and no proposed or final decision on the permit issuance is required. This report confirms the conclusion of the informational hearing process concerning the above-captioned application.

A handwritten signature in black ink that reads "Kathleen W. Reiser".

Kathleen W. Reiser, Esq.
Hearing Officer

Dated: December 12, 2023

cc: Service List

MEMORANDUM

TO: Jaimeson Sinclair, Director
Application No.: 202001530
Date Received: 1/29/2020

FROM: Valerie A. Galo, APCE II
Louis J. Corsino III, SAPCE

DATE: 10/13/2023

SUBJECT: Final Permit Signature for a Renewal of Title V Permit No. 117-0262-TV; Buckeye PT Terminals, L.P., New Haven Waterfront Terminal, New Haven, Connecticut

DISCUSSION:

Date of Tentative Determination Letter: 10/24/22

Date Notice of Tentative Determination was published: 10/24/22

Date ending 30-day Comment Period: 11/24/22

Date ending Environmental Protection Agency (EPA)'s Comment Period: 12/9/22

Date Notice of Hearing was published: 7/28/23

Date Tentative Determination Notice Fee Received: 8/2/23

Date Public Hearing Notice Fee Received: 8/23/23

Date of Public Hearing: 9/12/23

Deadline for Post Hearing Written Comments: 9/22/23

Comments Received and Changes Made:

I. Applicant's Comments

On 11/21/22, Frances Lindsley-Matthews, Senior Specialist, Air Compliance at Buckeye PT Terminals, L.P., submitted a letter via email requesting changes to the drafted permit. She also attached a marked-up version of the draft permit and re-signed application forms.

The comments to the Title V permit are listed below followed by the Department of Energy and Environmental Protection's (DEEP) response. The changes made to the draft permit were in accordance with the responses listed below.

Comment 1: Cover page - Please update the responsible official from Edwin Buchalski to Stephen Wing, Senior Operations Manager. The following forms have been updated with new contact information and signatures reflecting this change:

- Title V application Form (DEEP-TV-APP-100)
- Attachment F: Applicant Compliance Information (DEEP-APP-002)
- Attachment G: Title V Compliance Plan (DEEP-TV-APP-104)

Response 1: The change was made.

Comment 2: Section I.A, Premises Information, Facility Mailing Address - Please update the mailing address for the facility to: The Buckeye Building, 6161 Hamilton Blvd., Allentown, PA 18106.

Response 2: The change was made.

Comment 3: Please remove the phrase “by cross reference” to describe NSPS 40 CFR Part 60 Subpart XX throughout the document. The loading rack is subject to both NSPS 40 CFR Part 60 Subpart XX and NESHAP 40 CFR Part 63 Subpart BBBBBB.

- Section I.B, Premises Description, 5th paragraph
- Section II.A, Table II.A, Emissions Units Description, EU-10
- Section III.C, Description

Response 3: In EPA’s Applicability Determination Index there is a 2015 letter from EPA to MIPC, LLC ([Control No. Z150003](#)) on page 6 there is a table where EPA uses the term “by cross reference”. The cross-reference language was meant to describe where the applicable requirements come from not applicability. The premises description (Section I.B, 5th paragraph) was clarified by adding the text in italics as shown below:

The gasoline loading rack is subject to 40 CFR Part 63 Subpart 6B *and 40 CFR Part 60 Subpart XX* (Standards of Performance for Bulk Gasoline Terminals). *The applicable requirements for the gasoline loading rack come from 40 CFR Part 63 Subpart 6B; by cross reference, 40 CFR Part 60 Subpart XX.*

Comment 4: Please remove EU-40, Fire Pump Engine, throughout the document. The Fire Pump Engine has been replaced with an electric pump system and the engine is permanently disconnected and shutdown at the site.

- Section I.B, Premises Description, 7th paragraph
- Section II.A, Table II.A, Emissions Units Description
- Section II.C, Table II.C, Operating Scenario Identification
- Section III.F, EU-40, Fire Pump Engine

Response 4: The change was made.

Comment 5: Section I.B, Premises Description, listing of applicable regulations - Please delete the reference to NSPS 40 CFR Part 60 Subpart IIII.

Response 5: The change was made.

Comment Nos. 6-9 for GEU-1: EU-1 through EU-8 (Storage and Blending Tanks) (Installation Date: pre-July 1984)

Comment 6: Section III.A.1.a.i.(B) - Please update the language to include 40 CFR §60.112b(a)(1)(ii)(B) and the requirement from 40 CFR Part 63 Subpart 6B, Table 1 Item No. 2(b). 40 CFR 63 Subpart 6B, Table 1, Item No. 2(b) exempts sources from the **secondary** seal requirements for vapor mounted seals. A primary vapor mounted seal is an allowable configuration under 40 CFR Part 63 Subpart 6B, Table Item No. 2(b). Omitting the language of 40 CFR §60.112b(a)(1)(ii)(B) completely removes the applicable requirements for primary vapor-mounted seals which are utilized by several tanks at the facility per the source descriptions in Section II.A, Table II.A. Buckeye requests that the language 40 CFR §60.112b(a)(1)(ii)(B) as clarified by 40 CFR Part 63 Subpart 6B, Table 1, Item No. 2(b) be included to allow the use of vapor-mounted seals as control devices.

Additionally, Buckeye request that an exception be included strictly excusing the sources from the secondary seal requirements of the regulation pursuant to the exemption in 40 CFR Part 63 Subpart 6B, Table 1, Item No. 2(b). Please add the following additional paragraph under Section III.A.1.a.i.(B):

Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous. Except, the secondary seal requirements do not apply per 40 CFR Subpart 6B, Table 1, Item No. 2(b).

Response 6: On 11/7/23, a phone conference between Buckeye and the Air Bureau was held to get clarification on this comment. Buckeye explained that even though 40 CFR Part 63 Subpart BBBBBB, Table 1, Item No. 2(b) states “Equip each internal floating roof gasoline storage tank according to the requirements in § 60.112b(a)(1) of this chapter, except for the secondary seal requirements under § 60.112b(a)(1)(ii)(B) and the requirements in § 60.112b(a)(1)(iv) through (ix) of this chapter”, they have some tanks that have secondary seals and they maintain these tanks. Buckeye’s request is to voluntarily be subject to 40 CFR §60.112b(a)(1)(ii)(B). The change was made by adding 40 CFR §60.112b(a)(1)(ii)(B) to Section III.A.1.a.i.(B).

Comment 7: Section III.A.1.b.ii - Add the language in 40 CFR §60.113b(a)(3) to Section III.A.1.b.ii. as previously explained, the sources are only exempt from the secondary seal requirements for vapor-mounted seals pursuant to 40 CFR Part 63 Subpart 6B, Table 1, Item No. 2(b), but removing the requirements for double-seal systems also removes the applicable requirements for tanks with vapor-mounted primary seals. The Waterfront Terminal includes several tanks with vapor mounted seals. Buckeye requests that the inspection requirements of 40 CFR §60.113b(a)(3)(i) and (ii) be added as follows:

(3) For vessels equipped with a double-seal system as specified in 40 CFR §60.112b(a)(1)(ii)(B). Except, the secondary seal requirements do not apply per 40 CFR 63 Subpart 6B, Table 1, Item No 2(b):

*(i) Visually inspect the vessel as specified in 40 CFR §60.113b(a)(4) at least every five years; or
(ii) Visually inspect the vessel as specified in 40 CFR §60.113b(a)(2).*

Response 7: Buckeye’s request is to voluntarily be subject to the inspection requirements of 40 CFR §60.113b(a)(2) and 40 CFR §60.113b(a)(4). The change was made by adding the following language:

For vessels equipped with a seal system as specified in 40 CFR §60.112b(a)(1)(ii)(B) and 40 CFR Part 63 Subpart BBBBBB, Table 1, Item No. 2(b):[RCSA §22a-174-33(j)(K)(ii)]

(A) Visually inspect the vessel as specified in 40 CFR §60.113b(a)(4) at least every 5 years; or
(B) Visually inspect the vessel as specified in 40 CFR §60.113b(a)(2).

Comment 8: Section III.A.1.b.viii - This requirement references AP-42 Chapter 7 requirements, but incorrectly limits the use of AP-42 equations for tanks with Liquid Heels. A liquid heel refers to liquid remaining in the bottom of a tank when it is emptied. This is only applicable for certain modes of operation. For example, the tank would not have a liquid heel when being refilled following a tank cleaning or if the tank was drained dry. Thus, Buckeye request that the phrase “with Liquid Heel” be removed from this condition to more accurately represent all modes of operation for the tank for which the facility will estimate emissions.

Response 8: The change was made.

Comment 9: Section III.A.1.d.i - Per the comments regarding vapor mounted seals above, 40 CFR §60.113b(a)(3) is applicable to storage tanks subject to 40 CFR Subpart 6B since 40 CFR §60.112b(a)(1)(ii)(B) applies with clarifying language. Buckeye requests that the regulatory citations in this condition be updated to list both 40 CFR §60.113b(a)(2) and 40 CFR §60.113b(a)(3).

Response 9: The change was made.

Comment Nos. 10 & 11 for EU-9 (Storage and Blending Tank-Tank 218) (Installation Date: post-July 1984)

Comment 10: Section III.B.1.a.x - This requirement references AP-42 Chapter 7 requirements, but incorrectly limits the use of AP-42 equations for tanks with Liquid Heels. A liquid heel refers to liquid remaining in the bottom of a tank when it is emptied. This is only applicable for certain modes of operation. For example, the tank would not have a liquid heel when being refilled following a tank cleaning or if the tank was drained dry. Thus, Buckeye request that the phrase “with Liquid Heel” be removed from this condition to more accurately represent all modes of operation for the tank for which the facility will estimate emissions.

Response 10: The language is verbatim from Permit No. 117-0384. If the reference should be corrected, Buckeye should submit an application for a minor modification to the New Source Review permit and an application to modify the Title V permit. The change was not made.

Comment 11: Section III.B.1.b.iv - Buckeye requests the following language be added to the permit allowing the facility to utilize the alternative compliance option in 40 CFR §60.110b(e)(5).

Alternatively, the Permittee may elect to comply with the Alternative Means of Compliance provided in 40 CFR §60.110b(e)(5).

Response 11: In the highlighted copy of 40 CFR Part 60 Subpart Kb submitted by the applicant, this option was not highlighted therefore it was not originally included in the draft permit. The change was made.

Comment Nos. 12 & 13 for EU-10 (Distillate, Gasoline and Ethanol Loading Rack)

Comment 12: Section III.C.1.b.vi - Please delete this condition. It is a duplicate of Section III.C.1.b.iii. Also there is no 40 CFR §60.503(j).

Response 12: Corrected typo by changing 40 CFR §60.503(j) to 40 CFR §60.502(j).

Comment 13: Section III.C.2.b and c - Buckeye requests that the following permit conditions be updated to replace “The Permittee” with the regulatory language in RCSA §22a-174-19b. The New Haven Waterfront Terminal is a warehousing facility and Buckeye does not own or sell the product that the facility stores. This is consistent with the facility’s classification under *SIC Code No. 4226-Special Warehousing and Storage* listed in the premises description in the permit. The permit as written requires Buckeye as the permittee to test and keep records of fuel sulfur. However, Buckeye is not the owner or fuel supplier of the product. Buckeye reviews the certificates of analysis from the product supplier to ensure that the sulfur content of the fuel is acceptable prior to receiving the product. Buckeye requests that he permit be revised to include the regulatory language as stated in RCSA §22a-174-19b. The regulation clearly states the entities responsible for completing the testing and maintaining records.

Response 13: The following changes were made:

- Section III.C.2.b, Monitoring Requirements - Removed RCSA §§22a-174-19b(f)(1) and (2)
- Section III.C.2.c, Record Keeping Requirements
 - Removed RCSA §§22a-174-19b(g)(1) and (2)
 - Added “The Permittee shall maintain records sufficient to determine compliance with the limitation or restriction in Section III.C.2.a of this Title V permit.”

Comment No. 14 for EU-12 (Distillate Loading Rack)

Comment 14: Section III.D.1.b and c - Buckeye requests that the following permit conditions be updated to replace “The Permittee” with the regulatory language in RCSA §22a-174-19b. The New Haven Waterfront Terminal is a warehousing facility and Buckeye does not own or sell the product that the facility stores. This is consistent with the facility’s classification under *SIC Code No. 4226-Special Warehousing and Storage* listed in the premises description in the permit. The permit as

written requires Buckeye as the permittee to test and keep records of fuel sulfur. However, Buckeye is not the owner or fuel supplier of the product. Buckeye reviews the certificates of analysis from the product supplier to ensure that the sulfur content of the fuel is acceptable prior to receiving the product. Buckeye requests that the permit be revised to include the regulatory language as stated in RCSA §22a-174-19b. The regulation clearly states the entities responsible for completing the testing and maintaining records.

Response 14: The following changes were made:

- Section III.D.1.b, Monitoring Requirements - Removed RCSA §§22a-174-19b(f)(1) and (2)
- Section III.D.1.c, Record Keeping Requirements
 - Removed RCSA §§22a-174-19b(g)(1) and (2)
 - Added “The Permittee shall maintain records sufficient to determine compliance with the limitation or restriction in Section III.D.1.a of this Title V permit.”

II. EPA’s Comments

On 12/9/22, EPA’s comment period ended, and no comments were received.

III. Public Hearing - Oral Comments

On 9/12/23, an informational public hearing was held in New Haven’s City Hall. The public was invited to give oral comments. The Bureau of Air Management (BAM) received oral comments from 12 people.

The comments to the Title V permit are listed below followed by the DEEP’s response. The changes made to the draft permit were in accordance with the responses listed below.

a) Comments within the scope of [RCSA §22a-174-33\(j\)](#) - Standards for Issuing and Renewing Title V Permits

RCSA §22a-174-33(j) outlines the specific conditions and applicable requirements that must be contained within a Title V permit renewal. The definition of “applicable requirements”, as defined in RCSA §22a-174-33(a)(2), lists the items that can be covered in the Title V permit renewal as limited by statute and regulation. The following comments are those that DEEP believes are within the scope of RCSA §22a-174-33(j) and this specific permitting process.

Comment 15: The permit lists nine tanks but there are 14 tanks on site and the city records state there are 13 tanks. The permit should be clarified. [Oral Commenter No. 1]

Response 15: The 2020 BAM inspection report states “The Buckeye PT Waterfront Terminal operates 9 gasoline storage fuel tanks onsite, all in service during this inspection.” The draft Title V permit only lists the tanks at the facility that have specific applicable requirements. There are five other larger storage tanks on site that are not specifically listed in the Title V permit because they are only subject to the premises-wide requirements in the Title V permit. These five tanks are not subject to the requirements of RCSA §22a-174-20(a) because they do not store VOCs with a vapor pressure greater than 0.75 pounds per square inch absolute (psia). They are also not subject to any federal NSPS or NESHAP. Four of these tanks are listed in the Title V permit application as EU-15 through EU-18:

- EU-15: Tank No. 208 storing #2 fuel oil
- EU-16: Tank No. 213 storing diesel fuel
- EU-17: Tank No. 216 storing #2 fuel oil
- EU-18: Tank No. 217 storing #2 fuel oil

The fifth tank, Tank No. 207, previously stored distillate fuel but Buckeye has indicated it is idle and currently not in use. The facility also has multiple smaller storage tanks used for storing additives and other liquids that are only subject to premises-wide requirements in the Title V permit. These are listed as EU-19 through EU-34 in the Title V permit application. No changes

were made to the Title V permit based on this comment.

Comment 16: Six of the nine tanks are painted white and there are others that are rusty. The permit should address this. [Oral Commenter Nos. 1, 2 and 8; Written Commenter No. 4]

Response 16: Section III.A.1.a.vii and Section III.B.1.a.xii of the draft Title V permit requires the gasoline tanks to be painted and maintained white pursuant to RCSA §22a-174-20(a)(7). All gasoline tanks in question were constructed before the effective date of RCSA §22a-174-20(a)(7) and are required to be painted white by March 7, 2024. In addition, tanks that do not store VOCs with a vapor pressure of 0.75 psia or greater under standard conditions that have a maximum capacity of 2,000 gallons are not required to be painted white per RCSA §22a-174-20(a)(7). No changes were made to the Title V permit based on this comment.

Comment 17: DEEP should extend the season for which they don't allow clean out from May into September. [Oral Commenter Nos. 1 and 2; Written Commenter Nos. 3 and 4]

Response 17: The draft Title V permit language is verbatim from RCSA §22a-174-20(a)(9)(A) which states that no degassing shall occur during the period from June 1 through August 31 except as allowed in RCSA §22a-174-20(a)(9)(B). No changes were made to the Title V permit based on this comment.

Comment 18: It is also important to note that the development of the TANKS emission estimation framework was led by the industry the law is meant to regulate: TANKS software relies on emission estimating equations developed by the American Petroleum Institute... Installation of air quality monitoring sensors at the property fenceline will help determine if the calculated rates of emissions are fair reflections of the air pollution burden borne by New Haven residents and determine if facilities meet the threshold for New Source Review. Emissions monitoring results should be made available to the public in real time. [Oral Commenter Nos.1, 2, 3, 7 and 8; Written Commenter Nos. 3, and 4]

Response 18: The draft Title V permit requires calculations of monthly and annual VOC emissions, speciated HAP emissions and aggregate HAP emissions by using AP-42 Chapter 7 pursuant to RCSA §22a-174-33(j)(1)(K)(ii). This section was last updated in June 2020 and contains the best available methods of estimating emissions from VOC storage tanks. The June 2020 update of AP-42 Chapter 7 was proposed by EPA in July 2018 and was open for public comments from July 25, 2018 to November 26, 2018. Information on EPA's response to comments is available here: <https://www.epa.gov/air-emissions-factors-and-quantification/final-revisions-ap-42-chapter-7-section-71-organic-liquid>.

EPA regulations do not allow data from air quality sensors, as suggested by the commenters, as an approved data source for calculating emissions from stationary point sources. Air quality sensors are low cost and used to measure ambient concentrations, rather than emissions from each particular emissions source. In addition, any data gathered at the fenceline could be unreliable to attribute to the Buckeye facility because of the number and proximity of other VOC liquid storage facilities that border the property.

No changes were made to the Title V permit based on this comment.

Comment 19: Oil and hot asphalt odors emanating from Buckeye and VOC leaks and detection. [Oral Commenter Nos. 1, 2, 3, 4, 5, 8, 9 and 10; Written Commenter Nos. 1, 2, 3 and 4]

Response 19: Section V.D of the draft Title V permit addresses odors by citing [RCSA §22a-174-23](#), "Control of Odors". In addition, the draft Title V permit includes 40 CFR §63.11089 which requires Buckeye to do a monthly leak inspection of all equipment in gasoline service...including detection methods incorporating sight, sound, and smell. If nuisance odors are detected, a complaint can be filed with the Bureau of Air Management's Enforcement Division. Complaints about nuisance odors may be directed to the DEEP Air Complaints Line at (860) 424-3436 or sent by email to

deep.aircomplaints@ct.gov. No changes were made to the Title V permit based on this comment.

Comment 20: Trucks idling at Buckeye. [Oral Commenter No. 2]

Response 20: Section III.G.13 of the draft Title V permit states “The Permittee shall comply with the standards for control of particulate matter and visible emissions as set form in RCSA §22a-174-18.” Specifically, RCSA §22a-174-18(b)(3)(C) contains restrictions and exemptions for idling vehicles. In addition, DEEP Field staff investigate and respond to complaints of excessive idling regarding *commercial* vehicles and buses only; these complaints may be directed to DEEP’s Air Quality Complaint Line at (860) 424-3436 or sent by email to deep.aircomplaints@ct.gov or to the local or municipal authority. No changes were made to the Title V permit based on this comment.

Comment 21: Provide reports of routine inspections to the New Haven Health Department.
[Oral Commenter No. 4]

Response 21: DEEP’s inspection reports are available to the public through a [Freedom of Information Act \(FOIA\)](#) request. No changes were made to the Title V permit based on this comment.

Comment 22: The question is: why do we have these enormous emissions that have come out of all the oil tanks? Either the permits are not sufficient, or the permits are sufficient and DEEP, has not enforced the permits properly so, when there is a new permit, it either has to be far stricter than the one that is already there. It also should have fines attached to it, so that when they do not comply with the permit, there are actual fines that they will be afforded. This really cannot go on and the DEEP’s responsibility is to one figure out what has gone wrong with the permit that’s already there.

Does Buckeye deserve another permit when they have not been stewards of the first permit? If another permit is required, then DEEP must figure out what that permit has to say and how they are going to enforce it because this cannot continue.

[Oral Commenter No. 9; Written Commenter No. 1]

Response 22: When violations are found, the DEEP uses its available enforcement tools to ensure compliance with environmental laws. These tools include notices of violation and formal enforcement actions that may include monetary penalties and corrective actions. In addition, a review of the compliance history at the facility was conducted before recommending issuance of the Title V permit including reviewing the last inspection report, reviewing the facility’s annual compliance report, and reviewing the entire compliance record of the facility in accordance with DEEP’s Environmental Compliance History Policy. No changes were made to the Title V permit based on this comment.

Comment 23: Clarifying how tanks on this site, but not in this permit, are overseen by DEEP staff.
[Written Commenter No. 3]

Response 23: The Air Bureau inspects Title V facilities every other year. Tanks that are not listed in this permit are still subject to premises-wide requirements listed in the Title V permit and compliance with applicable premises-wide requirements is also verified during the Title V inspection. When violations are found, the DEEP uses its available enforcement tools to ensure compliance with environmental laws. These tools include notices of violation and formal enforcement and may include monetary penalties and corrective actions. No changes were made to the Title V permit based on this comment.

b) Comments outside the scope of RCSA §22a-174-33(j)

DEEP appreciates all comments received during the public comment period. The general comments in the table below are noted for the record; however, they are outside of the scope of this specific permitting action for a Title V permit renewal for this facility.

Table A: Comments outside the scope of RCSA §22a-174-33(j)

Commenter	Comment
Oral Commenter Nos. 1, 2 and 3 Written Commenter No. 2, 3 and 4	Heat Mitigation: <ul style="list-style-type: none"> • Switching black gravel to white gravel and • Increasing the number of trees or grass in the port • Painting every surface white including fence, roads and roofs
Oral Commenter Nos. 2 and 3 Written Commenter No. 4	Post signage with warning that the facility emits high levels of VOC around facility's perimeter
Oral Commenter Nos. 2, 4 and 7 Written Commenter Nos. 3 and 4	DEEP to create a public facing webpage to notify New Haven and East Haven Departments of Health and residents of major degassing events (i.e. roof landings, cleaning and emergency repairs)
Oral Commenter No. 3 Written Commenter No. 2	Smoker a few yards away from a "No Smoking" sign
Oral Commenter No. 3 Written Commenter No. 2	Broken chain link fence
Oral Commenter No. 3 Written Commenter No. 2	Funds for New Haven office of Climate and Sustainability
Oral Commenter No. 3 Written Commenter No. 2	Funds for anti-idling and anti-smoking education campaign
Oral Commenter No. 3 Written Commenter No. 2	Funds for public transportation education/encouragement campaign
Oral Commenter No. 5	Inventory of every tank in New Haven Harbor with description of tank's contents, tank's age, date of tank's last inspection
Oral Commenter Nos. 5, 6, 7 and 8 Written Commenter No. 4	Aggregation of multiple sources (i.e. two interstate highways, airport, other tanks, oil tanker traffic, blighted sites full of polychlorinated biphenyls (PCBs))
Oral Commenter Nos. 2, 8 and 11 Written Commenter Nos. 3 and 4	VOC health issues
Oral Commenter Nos. 10 and 12	Water quality and aquatic life

IV. Post Hearing-Written Comments

On 9/22/23, the post hearing written comments were due. The BAM received written comments from four people, two of which also gave oral comments. The written comments mostly repeated the oral comments, so the written comments were included above in Section III- Public Hearing-Oral Comments.

RECOMMENDATION:

Based on the information written above, it is recommended that Permit No. 117-0262-TV be issued to Buckeye PT Terminals, L.P.

/s/Valerie A. Galo
Valerie A. Galo, APCE II

11/28/2023
Date

REVIEW:

/s/ Louis J. Corsino III
Louis J. Corsino III
SAPCE

11/28/2023
Date

APPROVAL:

/s/Jaimeson Sinclair
Jaimeson Sinclair
Division Director

11/28/2023
Date