

Administrative Hearing Request Checklist and Tracking Form

I. Document Being Appealed

Name of the Facility	Facility ID Number	Permit Activity Number	Issuance Date
DELAWARE RIVER PARTNERS LLC	56309	PCP190002	

II. Contact Information

Name of Person Requesting Hearing	Name of Attorney (if applicable)
Address:	Address:
Telephone:	Telephone:

III. Please include the following information as part of your request:

- A. The date the permittee received the permit decision;
- B. Two printed copies of the document being appealed – for submitting to address 1 below;
A PDF copy of the document being appealed on a CD – for submitting to address 2 below
- C. The legal and factual questions you are appealing;
- D. A statement as to whether or not you raised each legal and factual issues during the permit application process;
- E. Suggested revised or alternative permit conditions;
- F. An estimate of the time required for the hearing;
- G. A request, if necessary, for a barrier-free hearing location for physically disabled persons;
- H. A clear indication of any willingness to negotiate a settlement with the Department prior to the Departments processing of your hearing request to the Office of Administrative Law;

Mail this form, completed, signed and dated with all of the information listed above, including attachment, to:

1. New Jersey Department of Environmental Protection
Office of Legal Affairs
Attention: Adjudicatory Hearing Requests
401 E. State Street, P.O. Box 402
Trenton, New Jersey 08625

2. Mail Code: 401-02
New Jersey Department of Environmental Protection
Air Quality Program
P.O. Box 420
Trenton, New Jersey 08625-0420
Phone: (609) 633-2829

Signature

Date

Administrative Hearing Request Checklist and Tracking Form

IV. If you are not the applicant but rather an interested person claiming to be aggrieved by the permit decision, please include the following information:

1. The date you or your agent received notice of the permit decision (include a copy of that permit decision with your hearing request);
2. Evidence that a copy of the request has been delivered to the applicant for the permit which is the subject of the permit decision;
3. A detailed statement of which findings of fact and/or conclusion of law you are challenging;
4. A description of your participation in any public hearings held in connection with the permit application and copies of any written comments you submitted;
5. Whether you claim a statutory or constitutional right to a hearing, and, if you claim such a right, a reference to the applicable statute or explanation of how your property interests are affected by the permit decision;
6. If the appeal request concerns a CAFRA permit decision, evidence that a copy of the request has been delivered to the clerks of the county and the municipality in which the project which is the subject of the permit decision is located;
7. Suggested revised or alternative permit conditions;
8. An estimate of the time required for the hearing;
9. A request, if necessary, for a barrier-free hearing location for physically disable persons;
10. A clear indication of any willingness to negotiate a settlement with the Department prior to the Department's transmittal of the hearing request to the Office of Administrative Law;

Mail this form, completed, signed and dated with all of the information listed above, including attachment, to:

New Jersey Department of Environmental Protection
Office of Legal Affairs
Attention: Adjudicatory Hearing Requests
401 East State Street, P.O. Box 402
Trenton, New Jersey 08625-0402

Mail Code: 401-02
New Jersey Department of Environmental Protection
Air Quality Program
P.O. Box 420
Trenton, New Jersey 08625-0420
Phone: (609) 633-2829

Signature

Date

AIR POLLUTION CONTROL PRECONSTRUCTION PERMIT

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Facility ID No.: 56309

Permit Activity No.: PCP190002

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DRAFT PERMIT

AIR POLLUTION CONTROL PRECONSTRUCTION PERMIT

Section A

Facility Name: DELAWARE RIVER PARTNERS LLC

Facility ID No.: 56309

Permit Activity No.: PCP190002

AUTHORIZED SOURCE OPERATIONS

This Preconstruction Permit and the Certificate to Operate for the following equipment is issued pursuant to N.J.A.C. 7:27-8.

Description of Source Activity

Source Operation Type: LPG Transfer and Degassing Operations

Source Operation Description: LPG transfer and degassing operations of depressurized rail cars, tanker trucks, marine vessels, and underground storage cavern with two enclosed flares for control of emissions

Source Operation Details: The sources authorized by this permit shall be operated within the parameters specified in the Equipment, Control Device, and/or Emission Unit/Batch Process Operating Scenario Details of this permit. Operation of the authorized sources within these parameters is required in addition to compliance with the conditions specified in Section D- Facility Specific Requirements.

DRAFT PERMIT

AIR POLLUTION CONTROL PRECONSTRUCTION PERMIT

Section B

Facility Name: DELAWARE RIVER PARTNERS LLC

Facility ID No.: 56309

Permit Activity No.: PCP190002

ACRONYMS

CEMS	Continuous Emissions Monitor System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COMS	Continuous Opacity Monitor System
EPA	United States Environmental Protection Agency
EMS	Emission Measurement Section - NJDEP
HAP	Hazardous Air Pollutant
N.J.A.C.	New Jersey Administrative Code
NJDEP	New Jersey Department of Environmental Protection
NOx	Oxides of Nitrogen
PM-2.5	All particulate matter having an aerodynamic diameter less than or equal to a nominal 2.5 microns
PM-10	All particulate matter having an aerodynamic diameter less than or equal to a nominal 10 microns
PST	Performance Specification Test
REO	Regional Enforcement Office - NJDEP
SO ₂	Sulfur Dioxide
TSP	Total Suspended Particulate Matter
VOC	Volatile Organic Compounds

AIR POLLUTION CONTROL PRECONSTRUCTION PERMIT

Section C

Facility Name: DELAWARE RIVER PARTNERS LLC

Facility ID No.: 56309

Permit Activity No.: PCP190002

GENERAL PROVISIONS AND AUTHORITIES

Preconstruction Permits

1. Notwithstanding compliance with other provisions of N.J.A.C. 7:27-1 et seq., no person shall cause, suffer, allow or permit to be emitted into the outdoor atmosphere substances in quantities which shall result in air pollution as defined at N.J.A.C. 7:27-5.1. [N.J.A.C. 7:27-5.2(a)]
2. The permittee shall not construct, reconstruct, install, or modify a significant source or control apparatus serving the significant source without first obtaining a preconstruction permit under N.J.A.C. 7:27-8. [N.J.A.C. 7:27-8.3(a)]
3. The permittee shall not operate (nor cause to be operated) a significant source or control apparatus serving the significant source without a valid operating certificate. [N.J.A.C. 7:27-8.3(b)]

4. Permit Revisions:

The permittee shall not take any action which requires a permit revision, compliance plan change, seven-day-notice change, amendment, or change to a batch plant permit, under any applicable provision at N.J.A.C. 7:27-8.17 through 8.23, without complying with that applicable provision.

The following summarize N.J.A.C. 7:27-8.18 through 8.21:

- a. The permittee shall file a permit revision request and receive approval from the Department prior to increasing any maximum allowable emission limit, increasing actual emissions, to a rate or concentration greater than a maximum allowable emission, causing the emissions of a new air contaminant, use a new raw material, reconstructing equipment, change the ground level concentration of an air contaminant in an area where the public has access, replace the permitted source, or constructing or installing a new significant source. [N.J.A.C. 7:27-8.18]
- b. The permittee shall file a compliance plan change request and receive approval from the Department prior to decreasing the frequency of testing, monitoring, recordkeeping, or reporting, changing the monitoring method, changing a level, rate, or limit of an operational parameter included in the conditions, or reducing a source's potential to emit. [N.J.A.C. 7:27-8.19]
- c. At least seven days prior to proceeding with a physical or operational change that is outside the scope of activities allowed by this permit, but will not increase emissions over the allowable emissions and will not alter the stack characteristics, the permittee shall file a seven-day-notice change. The permittee

may proceed with the proposed changes seven days after such notice is filed with the Department. [N.J.A.C. 7:27-8.20]

- d. The permittee shall file an amendment within 120 days of making any change of the information which allows the Department to identify and contact the permittee, changing the name, number or designation of any equipment or stack covered by this permit, changing the parameters of a stack in such a way to reduce the ground level concentration of an air contaminant, or correction of a typographical error that will not result in an increase of actual or allowable emissions. [N.J.A.C. 7:27-8.21]

The permittee shall review the provisions of N.J.A.C. 7:27-8.18 through 7:27-8.21 to determine the appropriate type of request to file.

5. The permittee shall make the preconstruction permit or certificate, together with any amendments, seven-day-notices, or other documents related to the permit and certificate, readily available for Department inspection on the operating premises. [N.J.A.C. 7:27-8.3(d)]
6. The permittee shall not use or cause to be used the equipment or control apparatus unless all components connected or attached to, or serving, the equipment or control apparatus, are functioning properly and are in compliance with the preconstruction permit and certificate and all conditions and provisions thereto. [N.J.A.C. 7:27-8.3(e)]
7. A preconstruction permit is not transferable either from the location authorized in the preconstruction permit to another location, or from any one piece of control apparatus or equipment to another piece of control apparatus or equipment. [N.J.A.C. 7:27-8.3(f)]
8. Once a permit or certificate is issued, the permittee is fully responsible for compliance with N.J.A.C. 7:27-8 and with the permit and certificate, including adequate design, construction, and operation of the source, even if employees, contractors, or others work on or operate the permitted source. If the Department issues any other requirement with the force of law, such as an order, which applies to the source, the permittee is also responsible for compliance with that requirement. [N.J.A.C. 7:27-8.3(g)]
9. Preconstruction permits and certificates do not in any way relieve the permittee from the obligation to obtain necessary permits from other government agencies and to comply with all other applicable Federal, State, and local rules and regulations. [N.J.A.C. 7:27-8.3(h)]
10. The permittee shall not suffer, allow, or permit any air contaminant detectable by the sense of smell, to be present in the outdoor atmosphere in such quantity and duration which is, or tends to be, injurious to human health or welfare, animal or plant life or property, or would unreasonably interfere with the enjoyment of life or property. This shall not include an air contaminant which occurs only in areas over which the permittee has exclusive use or occupancy. In determining whether an odor unreasonably interferes with the enjoyment of life or property, the Department shall consider all of the relevant facts and circumstances, including, but not limited to, the character, severity, frequency, and duration of the odor, and the number of persons affected thereby. In considering these and other relevant facts and circumstances, no one factor shall be dispositive, but each shall be considered relevant in determining whether an odor interferes with the enjoyment of life or property, and, if so, whether such interference is unreasonable considering all of the circumstances. [N.J.A.C. 7:27-8.3(j)]

11. The Department and its representatives have the right to enter and inspect any facility or property in accordance with N.J.A.C. 7:27-1.31. [N.J.A.C. 7:27-8.3(m)]
12. There shall be an affirmative defense to liability for penalties for a violation of a preconstruction permit or certificate occurring as a result of an equipment malfunction, an equipment start-up, an equipment shutdown, or during the performance of necessary maintenance. The affirmative defense shall be asserted and established as required pursuant to P.L. 1993. c.89 (adding N.J.S.A. 26:2C-19.1 through 2C-19.5) and any rules the Department promulgates thereunder, and shall meet all of the requirements thereof. There shall also be an affirmative defense to liabilities for penalties or other sanctions for noncompliance with any technology based emission limitation in this permit or certificate, if the noncompliance was due to an emergency as defined at N.J.A.C. 7:27-22.1, provided that the affirmative defense is asserted and established in compliance with 40 CFR 70.6(g) and meets all requirements thereof. [N.J.A.C. 7:27-8.3(n)]
13. The permittee shall not cause or use the equipment specified in a preconstruction permit in a manner that will result in the emission of any air contaminant not listed in the Facility Specific Requirements in this Preconstruction Permit at a rate equal to or higher than the applicable reporting threshold in Table A in N.J.A.C. 7:27-8 Appendix 1 or 7:27-17.9(a). [N.J.A.C. 7:27-8.4(k)1]
14. No air contaminant, or category of air contaminant, where accepted by the Department, shall be emitted other than those approved in the preconstruction permit. [N.J.A.C. 7:27-8.13(a)]
15. Any person to whom the Department has issued a preconstruction permit or certificate shall comply with all terms and conditions of any order related to the preconstruction permit or certificate. [N.J.A.C. 7:27-8.13(a)]
16. The permittee shall maintain all records required in the preconstruction permit for a period of five (5) calendar years from the calendar year within which the record was generated. [N.J.A.C. 7:27-8.13(a)]
17. The Department may change the conditions of approval of any approved certificate to operate at the time of renewal of a temporary operating certificate; at the time of approval or renewal of a five-year operating certificate; or at any time during the period a certificate is in effect, if the Department determines that such change is necessary to protect human health or welfare or the environment. [N.J.A.C. 7:27-8.13(b)]
18. Upon request of the Department, the permittee shall submit to the Department information relevant to the operation of equipment and control apparatus including all information specified at N.J.A.C. 7:27-8.13(c). [N.J.A.C. 7:27-8.13(c)]
19. If the conditions of a preconstruction permit or certificate to operate require the Department to incur any of the following charges, the permittee shall reimburse the Department for the full amount of these charges: (1) The charges billed by any phone company for the maintenance of a dedicated telephone line required by this permit or the certificate to operate for the electronic transmission of data; or (2) The charges billed by any laboratory for performing the analysis of audit samples collected pursuant to testing or monitoring required by this permit or the certificate to operate. [N.J.A.C. 7:27-8.13(g)]
20. Any exceedance of the operating requirements or emission concentrations specified in a preconstruction permit shall be reported within three (3) business days, by writing to the Regional Enforcement Office. [N.J.A.C. 7:27-8.13(h)]

21. The permittee shall, when requested by the Department, provide such testing facilities exclusive of instrumentation and sensing devices as may be necessary for the Department to determine the kind and amount of air contaminants emitted from the equipment or control apparatus. The testing facilities shall include the utilities, the structure to hold testing equipment and/or personnel, and any ports in stacks needed to carry out testing required by this permit. During testing by the Department, the equipment and control apparatus shall be operated under such conditions within their capacities as may be requested by the Department. The test facilities may be either permanent or temporary, at the discretion of the person responsible for their provision, and shall conform to all applicable laws, regulations, and rules concerning safe construction and safe practice. Testing facilities, which contain platforms and other means of personnel access, shall conform to OSHA standards. [N.J.A.C. 7:27-8.13(i)]
22. Upon request of the Department, the permittee shall submit to the Department any record relevant to any permit or certificate. Such records shall be submitted to the Department within thirty (30) days of the request by the Department or within a longer time period if approved in writing by the Department. [N.J.A.C. 7:27-8.15(a)]
23. The permittee shall submit any required report in a format and on a schedule approved by the Department. Such report shall be transmitted on paper, on computer disk, or electronically, at the discretion of the Department. [N.J.A.C. 7:27-8.15(b)]
24. Any report submitted to the Department, including but not limited to, a report submitted as an amendment of this permit or the certificate to operate pursuant to N.J.A.C. 7:27-8.3(c) shall include, as an integral part of the report, certifications complying with N.J.A.C. 7:27-1.39. [N.J.A.C. 7:27-8.15(c)]
25. Upon request of the Department, the permittee shall report on forms obtained from the Department the air contaminant actual emissions and information relevant thereto, of any air contaminant or category of air contaminant emitted by the equipment, control apparatus, or source operation. [N.J.A.C. 7:27-8.15(d)]
26. This listing of requirements reflects the state rules and regulations that apply to a majority of sources. If a specific requirement in a rule or regulation that applies to a permittee is not included in this section or in the Facility Specific Requirements it does not relieve the permittee from the obligation to comply with that regulation.
27. Process monitors must be operated at all times when the associated process equipment is operating except during outage time allowed by Department guidelines/procedures or as outlined in Technical Manual 1005. The Permittee must keep a service log as required.
28. Each permittee shall meet all requirements of the approved source emissions testing and monitoring protocol during the term of the operating permit. Whenever the facility makes a replacement, modification, change or repair of a certified CEMS or COMS that may significantly affect the ability of the system to accurately measure or record data, the facility must recertify the CEMS or COMS in accordance with Section V.B. and Appendix E of Technical Manual 1005. The facility is responsible for contacting the Emission Measurement Section to determine the need for recertification and/or to initiate the recertification process. The facility is responsible for any downtime associated with the replacement, modification, change or repair of the CEMS or COMS. [N.J.A.C. 7:27-8.13(d)]

29. The following Department offices may be referenced in a preconstruction permit. Please use the following addresses when submitting any correspondence to these offices:

Emission Measurement Section
 Mail Code: 09-01, P.O. Box 420
 Trenton, NJ 08625-0420

Central Regional Enforcement Office
 P. O. Box 407
 Trenton, NJ 08625-0407

Northern Regional Enforcement Office
 7 Ridgedale Avenue
 Cedar Knolls, NJ 07927

Southern Regional Enforcement Office
 2 Riverside Drive – Suite 201
 Camden, NJ 08102

30. In accordance with the Air Pollution Control Act at N.J.S.A. 26:2C-19(e), any operation of the equipment which may cause off-property effect, including odors, shall be immediately reported by calling the NJDEP Environmental Action Hotline at (877) 927-6337.
31. In accordance with N.J.A.C. 7:27-21, facilities are required to submit annual emission statements of their actual emissions if the Potential-to-emit for the entire facility exceeds the following thresholds (including all emissions from the facility, both permitted and unpermitted). Additional information about Emission Statement reports can be obtained by calling (609) 984-5483.

AIR CONTAMINANT	Threshold in Tons per Year
VOC (Volatile Organic Compounds)	10
NO _x (Oxides of Nitrogen)	25
CO (Carbon Monoxide)	100
SO ₂ (Sulfur Dioxide)	100
TSP (Total Suspended Particulates)	100
PM _{2.5} (Particulate Matter ≤ 2.5 microns)	100
PM ₁₀ (Particulate Matter ≤ 10 microns)	100
NH ₃ (Ammonia)	100
Lead	5

32. In accordance with N.J.A.C. 7:27-22, facilities are required to submit a Title V Operating Permit application, within one year, if the potential-to-emit for the entire facility exceeds any of the following thresholds (including all emissions from the facility, both permitted and unpermitted). Additional Information about Operating Permits can be obtained by calling the Operating Permit Hotline at (609) 633-8248.

AIR CONTAMINANT	Threshold in Tons per Year
VOC (Volatile Organic Compounds)	25
NO _x (Oxides of Nitrogen)	25
CO (Carbon Monoxide)	100
SO ₂ (Sulfur Dioxide)	100
TSP (Total Suspended Particulates)	100
PM ₁₀ (Particulate Matter ≤ 10 microns)	100
Lead	10
Any HAP (Hazardous Air Pollutant)	10
All HAPs Collectively	25
Any other Air Contaminant	100

33. In accordance with N.J.A.C. 7:27-8.13(e), facilities are subject to 4 billable compliance inspections over the life of the Operating Certificate. Facilities will be invoiced for a service fee per inspection pursuant to N.J.A.C. 7:27-8.6 after the periodic compliance inspection is conducted.

DRAFT PERMIT

AIR POLLUTION CONTROL PRECONSTRUCTION PERMIT

Section D

Facility Name: DELAWARE RIVER PARTNERS LLC

Facility ID No.: 56309

Permit Activity No.: PCP190002

PERMIT INFORMATION

FACILITY SPECIFIC REQUIREMENTS

REASON FOR APPLICATION

FACILITY PROFILE (GENERAL)

EQUIPMENT INVENTORY

CONTROL DEVICE INVENTORY

EMISSION POINT INVENTORY

EMISSION UNIT/BATCH PROCESS INVENTORY

DRAFT PERMIT

AIR POLLUTION CONTROL PRECONSTRUCTION PERMIT

Section D

Facility Name: DELAWARE RIVER PARTNERS LLC

Facility ID No.: 56309

Permit Activity No.: PCP190002

FACILITY SPECIFIC REQUIREMENTS

DRAFT PERMIT

PCP190002

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Emission Unit: U1 Operation of Hard Rock Cavern and LPG Railcar Unloading Facility

Subject Item: CD2 Flare 2

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	The owner or operator shall install, operate, and maintain an enclosed flare in accordance with manufacturer's specifications and instructions. [N.J.A.C. 7:27-16.13(a)]	Monitored by documentation of construction upon occurrence of event. Review manufacturer's specifications to ensure compliance. [N.J.A.C. 7:27-16.13(b)]	Recordkeeping by manual logging of parameter or storing data in a computer data system upon occurrence of event and maintain all records on site at all times. [N.J.A.C. 7:27- 8.13(d)3]	None.
2	Maximum Gross Heat Input <= 34 MMBTU/hr (HHV). [N.J.A.C. 7:27- 8.13(a)]	Maximum Gross Heat Input: Monitored by documentation of construction once initially. Review manufacturer's specifications to ensure compliance. [N.J.A.C. 7:27- 8.13(d)2]	Maximum Gross Heat Input: Recordkeeping by manual logging of parameter or storing data in a computer data system once initially and maintain all records on site at all times. [N.J.A.C. 7:27- 8.13(d)3]	None.
3	Minimum Operating Temperature at the Exit of the Combustion Section >= 1,500 degrees F. The flare shall be designed to operate at no less than the minimum operating temperature at or after the exit of the combustion section. [N.J.A.C. 7:27- 8.13(a)]	Minimum Operating Temperature at the Exit of the Combustion Section: Monitored by temperature instrument continuously, based on 6 minute blocks. The permittee shall install, operate and maintain an alarm or other operational warning system, properly shielded from direct contact with the flame. The alarm shall be designed to sound at any time flare temperature is detected to be less than the permitted operating temperature. The permittee shall install, calibrate and maintain the monitor(s) in accordance with the manufacturer's specifications. The monitor(s) shall be ranged such that the allowable value is approximately mid-scale of the full range current/voltage output. [N.J.A.C. 7:27- 8.13(d)2]	Minimum Operating Temperature at the Exit of the Combustion Section: Recordkeeping by strip chart or data acquisition (DAS) system continuously. [N.J.A.C. 7:27- 8.13(d)3]	None.
4	Minimum Residence Time >= 0.5 seconds. The flare shall be designed to operate at no less than the minimum residence time. [N.J.A.C. 7:27- 8.13(a)]	Minimum Residence Time: Monitored by calculations initial calculations only. [N.J.A.C. 7:27- 8.13(d)]	Minimum Residence Time: Recordkeeping by manual logging of parameter or storing data in a computer data system once initially. [N.J.A.C. 7:27- 8.13(d)3]	None.

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
5	The permittee shall install, operate, and maintain a continuous pilot-flame scanner to monitor the pilot flame to ensure the presence of a pilot flame. If the pilot flame is extinguished, flow of exhaust gas to the flare shall be automatically shut off, the system inspected, and the pilot flame shall be reignited. If the pilot flame cannot be reignited, exhaust gas to the flare shall be maintained in the off-position until the pilot flame is reignited. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
6	The flare shall have a smokeless design. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
7	Minimum Design Destruction and Removal Efficiency $\geq 98\%$. [N.J.A.C. 7:27- 8.13(a)]	Destruction and Removal Efficiency: Monitored by documentation of construction once initially. Review manufacturer's specifications to ensure compliance. [N.J.A.C. 7:27- 8.13(d)1]	Destruction and Removal Efficiency: Recordkeeping by manual logging of parameter or storing data in a computer data system once initially and maintain all records on site at all times. [N.J.A.C. 7:27- 8.13(d)3]	None.
8	Permittee shall install a non-resettable gas totalizing meter at the flare inlet in accordance with manufacturer's specifications and instructions for monitoring influent process vapor flow. [N.J.A.C. 7:27- 8.13(a)]	Other: Review process design and operation once initially to ensure compliance.[N.J.A.C. 7:27- 8.13(d)1].	Recordkeeping by manual logging of parameter or storing data in a computer data system once initially and maintain all records on site at all times. [N.J.A.C. 7:27- 8.13(d)3]	None.
9	All process emissions to the outdoors shall be routed and vented through the flare, including the safety vents located on a tanker truck, railcar, and cavern. All hoses for tanker truck, railcar, and cavern filling/unloading shall use isolation dry break valves to minimize any release of vapor and/or liquid from any of the hoses to atmosphere. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.

PCP190002

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Emission Unit: U1 Operation of Hard Rock Cavern and LPG Railcar Unloading Facility

Subject Item: CD3 Flare 3

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	The owner or operator shall install, operate, and maintain an enclosed flare in accordance with manufacturer's specifications and instructions. [N.J.A.C. 7:27-16.13(a)]	Monitored by documentation of construction upon occurrence of event. Review manufacturer's specifications to ensure compliance. [N.J.A.C. 7:27-16.13(b)]	Recordkeeping by manual logging of parameter or storing data in a computer data system upon occurrence of event and maintain all records on site at all times. [N.J.A.C. 7:27- 8.13(d)3]	None.
2	Maximum Gross Heat Input \leq 81.4 MMBTU/hr (HHV). [N.J.A.C. 7:27- 8.13(a)]	Maximum Gross Heat Input: Monitored by documentation of construction once initially. Review manufacturer's specifications to ensure compliance. [N.J.A.C. 7:27- 8.13(d)2]	Maximum Gross Heat Input: Recordkeeping by manual logging of parameter or storing data in a computer data system once initially and maintain all records on site at all times. [N.J.A.C. 7:27- 8.13(d)3]	None.
3	Minimum Operating Temperature at the Exit of the Combustion Section \geq 1,500 degrees F. The flare shall be designed to operate at no less than the minimum operating temperature at or after the exit of the combustion section. [N.J.A.C. 7:27- 8.13(a)]	Minimum Operating Temperature at the Exit of the Combustion Section: Monitored by temperature instrument continuously, based on 6 minute blocks. The permittee shall install, operate and maintain an alarm or other operational warning system, properly shielded from direct contact with the flame. The alarm shall be designed to sound at any time flare temperature is detected to be less than the permitted operating temperature. The permittee shall install, calibrate and maintain the monitor(s) in accordance with the manufacturer's specifications. The monitor(s) shall be ranged such that the allowable value is approximately mid-scale of the full range current/voltage output. [N.J.A.C. 7:27- 8.13(d)2]	Minimum Operating Temperature at the Exit of the Combustion Section: Recordkeeping by strip chart or data acquisition (DAS) system continuously. [N.J.A.C. 7:27- 8.13(d)3]	None.
4	Minimum Residence Time \geq 0.5 seconds. The flare shall be designed to operate at no less than the minimum residence time. [N.J.A.C. 7:27- 8.13(a)]	Minimum Residence Time: Monitored by calculations initial calculations only. [N.J.A.C. 7:27- 8.13(d)]	Minimum Residence Time: Recordkeeping by manual logging of parameter or storing data in a computer data system once initially. [N.J.A.C. 7:27- 8.13(d)3]	None.

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
5	The permittee shall install, operate, and maintain a continuous pilot-flame scanner to monitor the pilot flame to ensure the presence of a pilot flame. If the pilot flame is extinguished, flow of exhaust gas to the flare shall be automatically shut off, the system inspected, and the pilot flame shall be reignited. If the pilot flame cannot be reignited, exhaust gas to the flare shall be maintained in the off-position until the pilot flame is reignited. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
6	The flare shall have a smokeless design. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
7	Minimum Design Destruction and Removal Efficiency $\geq 98\%$. [N.J.A.C. 7:27- 8.13(a)]	Destruction and Removal Efficiency: Monitored by documentation of construction once initially. Review manufacturer's specifications to ensure compliance. [N.J.A.C. 7:27- 8.13(d)1]	Destruction and Removal Efficiency: Recordkeeping by manual logging of parameter or storing data in a computer data system once initially and maintain all records on site at all times. [N.J.A.C. 7:27- 8.13(d)3]	None.
8	Permittee shall install a non-resettable gas totalizing meter at the flare inlet in accordance with manufacturer's specifications and instructions for monitoring influent process vapor flow. [N.J.A.C. 7:27- 8.13(a)]	Other: Review process design and operation once initially to ensure compliance.[N.J.A.C. 7:27- 8.13(d)1].	Recordkeeping by manual logging of parameter or storing data in a computer data system once initially and maintain all records on site at all times. [N.J.A.C. 7:27- 8.13(d)3]	None.
9	All process emissions to the outdoors shall be routed and vented through the flare, including the safety vents located on a tanker truck, railcar, and cavern. All hoses for tanker truck, railcar, and cavern filling/unloading shall use isolation dry break valves to minimize any release of vapor and/or liquid from any of the hoses to atmosphere. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Emission Unit: U1 Operation of Hard Rock Cavern and LPG Railcar Unloading Facility

Operating Scenario: OS Summary

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	The storage and transfer source operations shall be limited to commercial Liquid Petroleum Gas (LPG) products and nitrogen. [N.J.A.C. 7:27- 8.13(a)]	Other: Review each storage and transfer operation to ensure compliance.[N.J.A.C. 7:27- 8.13(d)1].	Recordkeeping by manual logging of parameter or storing data in a computer data system each month during operation and maintain all records on site at all times. [N.J.A.C. 7:27- 8.13(d)3]	None.
2	There shall be no visible emissions except for a period of not longer than three minutes in any consecutive thirty (30) minute period. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
3	Any operation of equipment which may cause off-property effects, including odors, shall be immediately reported to the Department to the extent required by the Air Pollution Control Act, N.J.S.A. 26:2C-19(e). [N.J.S.A. 26:2C-19(e)]	Other: The source operations shall be monitored by Lower Explosive Limit (LEL) meters equipped with an alarm system during operation to ensure concentrations do not exceed the LEL.[N.J.A.C. 7:27- 8.13(d)1].	Recordkeeping by manual logging of parameter or storing data in a computer data system each week during operation and maintain all records on site at all times, including alarm events and copy of all information submitted to the Department. [N.J.A.C. 7:27- 8.13(d)3]	Notify by phone: Upon occurrence of event A person who causes a release of air contaminants in a quantity or concentration which poses a potential threat to public health, welfare or the environment or which might reasonably result in citizen complaints shall immediately notify the Department. Such notification shall be made by calling the Environmental Action Hotline at (877) 927-6337. [N.J.S.A. 26:2C-19(e)]
4	CO <= 0.67 tons/yr. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
5	NOx (Total) <= 1.2 tons/yr. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
6	VOC (Total) <= 8.61 tons/yr. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
7	Methane <= 0.02 tons/yr. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
8	TSP <= 0.06 tons/yr. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
9	PM-10 (Total) <= 0.06 tons/yr. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
10	PM-2.5 (Total) <= 0.06 tons/yr. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
11	Vapor Pressure <= 59.7 psia @ 70 degrees F for Butane and vapor pressure of <= 110 psia @ 70 degrees F for Propane. [N.J.A.C. 7:27- 8.13(a)]	None.	Vapor Pressure: Recordkeeping by manual logging of parameter once initially. The permittee shall record the vapor pressure of all materials to be stored or blended in the tank. [N.J.A.C. 7:27- 8.13(d)3]	None.
12	Total Throughput <= 7.64 MMft ³ /yr This limit shall be the combined maximum annual volume of gaseous emissions from the storage and transfer source operations to the flare. [N.J.A.C. 7:27- 8.13(a)]	Total Throughput: Monitored by gas use totalizing meter annually, based on a consecutive 12 month period (rolling 1 month basis). [N.J.A.C. 7:27- 8.13(d)2]	Total Throughput: Recordkeeping by manual logging of parameter or storing data in a computer data system each month during operation and maintain all records on site at all times. [N.J.A.C. 7:27- 8.13(d)3]	None.
13	The permittee shall maintain records of tank (Cavern) contents and throughput. [N.J.A.C. 7:27- 8.13(a)]	None.	Recordkeeping by manual logging of parameter or storing data in a computer data system annually. The permittee shall record the annual combined total throughput of all material stored or blended in the tank (Cavern). [N.J.A.C. 7:27- 8.13(d)3]	None.
14	The storage tank (Cavern) shall be equipped with a submerged fill pipe, or other VOC control method approved by the Department. [N.J.A.C. 7:27-16.4(b)]	None.	None.	None.
15	The tank (Cavern) shall be equipped with and operating a vapor control system which reduces the concentration of applicable VOC in the air-vapor mixture displaced during the transfer of applicable VOC by no less than 90 percent. [N.J.A.C. 7:27-16.4(c)1]	None.	None.	None.
16	If the tank (Cavern) 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.
17	The permittee shall maintain records specifying each VOC stored and the vapor pressure of each VOC at standard conditions. [N.J.A.C. 7:27-16.2(s)1]	None.	Recordkeeping by manual logging of parameter or storing data in a computer data system per change of material. Records shall be maintained for each tank. [N.J.A.C. 7:27-16.2(s)1]	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Emission Unit: U1 Operation of Hard Rock Cavern and LPG Railcar Unloading Facility

Operating Scenario: OS1 Initial Filling the Hard Rock Cavern

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	Source flue gas shall be exhausted through the flare. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
2	The cavern shall be a liquid underground storage tank as defined in N.J.A.C. 7:14B. [N.J.A.C. 7:27-16.1]	None.	None.	None.
3	Design Capacity <= 7.8 MMgals. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
4	CO <= 7.97 lb/hr. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
5	NOx (Total) <= 14.22 lb/hr. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
6	VOC (Total) <= 82.57 lb/hr. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
7	TSP <= 0.76 lb/hr. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
8	PM-10 (Total) <= 0.76 lb/hr. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
9	PM-2.5 (Total) <= 0.76 lb/hr. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
10	Methane <= 0.19 lb/hr. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Emission Unit: U1 Operation of Hard Rock Cavern and LPG Railcar Unloading Facility

Operating Scenario: OS2 Rail LR 1, OS3 Rail LR 2, OS4 Rail LR 3, OS6 Rail LR 5, OS7 Rail LR 6, OS8 Truck LR 1, OS9 Truck LR 2, OS10 Rail LR 7 Railcar Depressurizing, OS11 Rail LR 8 Railcar Depressurizing, OS12 Thermal Relief of Transfer Lines, OS13 Maintenance Activities

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	Source flue gas shall be exhausted through the flare. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
2	CO <= 7.97 lb/hr. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
3	NOx (Total) <= 14.22 lb/hr. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
4	VOC (Total) <= 82.57 lb/hr. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
5	TSP <= 0.76 lb/hr. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
6	PM-10 (Total) <= 0.76 lb/hr. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
7	PM-2.5 (Total) <= 0.76 lb/hr. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
8	Methane <= 0.19 lb/hr. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.

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**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Emission Unit: U1 Operation of Hard Rock Cavern and LPG Railcar Unloading Facility

Operating Scenario: OS14 Loading of Marine Vessel from Railcar or Cavern

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	Effective on July 26, 1994, if a marine tank vessel and marine terminal is equipped with a control apparatus, no person shall cause, suffer, allow, or permit ballasting to be conducted on a marine tank vessel at a marine terminal, unless: 1. The ballasting is conducted in dedicated ballast tanks that only use water; 2. The control apparatus is used during ballasting; or 3. The potential to emit VOC from ballasting is less than two pounds of VOC per 1,000 barrels of ballast transferred. [N.J.A.C. 7:27-16.5(e)]	None.	None.	None.
2	The owner or operator of a marine terminal shall maintain at the marine terminal records sufficient to demonstrate compliance with N.J.A.C. 7:27-16.5. Any records required by this section shall be made available to the Department upon request and shall be maintained for five years. [N.J.A.C. 7:27-8.13(a)] &. [N.J.A.C. 7:27-16.5(j)]	None.	Other: For each transfer of applicable VOC to the marine tank vessel and for performance of ballasting on a marine tank vessel at the marine terminal, the records shall include the following information: 1. The company name and address of the marine terminal; 2. The date; 3. The name and registry of the marine tank vessel; 4. For any transfer operation, the type of VOC and the quantity, in gallons or liters, loaded into the marine tank vessel; 5. The prior cargo carried by the marine tank vessel and the condition (that is, cleaned, crude oil washed, gas freed, etc.) of the cargo tanks on the marine tank vessel prior to their being loaded or ballasted; and 6. For ballasting, the amount of ballast water or other liquid added to ballast tanks which are unsegregated and which may contain VOC vapor.[N.J.A.C. 7:27-16.5(j)].	None.

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
3	Source flue gas shall be exhausted through the flare. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
4	CO <= 7.97 lb/hr. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
5	NOx (Total) <= 14.22 lb/hr. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
6	VOC (Total) <= 82.57 lb/hr. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
7	TSP <= 0.76 lb/hr. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
8	PM-10 (Total) <= 0.76 lb/hr. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
9	PM-2.5 (Total) <= 0.76 lb/hr. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.
10	Methane <= 0.19 lb/hr. [N.J.A.C. 7:27- 8.13(a)]	None.	None.	None.

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**New Jersey Department of Environmental Protection
Reason for Application**

Permit Being Modified

Permit Class: PCP **Number:** 180001

Description of Modifications: On behalf of Delaware River Partners LLC (DRP), Ramboll is submitting this application for a permit modification of PCP180001 to the New Jersey Department of Environmental Protection (NJDEP) for the installation of a Liquefied Petroleum Gas Railcar Unloading Facility (LPG-RUF) at the DRP Gibbstown Logistics Center located in Gibbstown, Gloucester County, New Jersey.

DRP is proposing to add an LPG-RUF operation designed to transload product (butane and/or propane) directly from railcars to a marine vessel located at the existing multi-purpose dock. The existing equipment associated with the hard rock cavern handles butane-based liquified petroleum gas. The new proposed equipment will handle propane or butane-based liquid petroleum gases. Once constructed, the transloading facility will consist of two double-sided rail racks (East and West) with capacity of twenty cars per side for a total capacity forty cars. A new flare (CD3) will be constructed as part of this proposed expansion. All emission sources from the proposed expansion will be controlled by the flare. In addition, this flare (CD3) will be connected by a manifold to the existing lines to the existing flare (CD2), so that both flares will be available for either operation based on the needs of the facility and redundancy in case of an emergency.

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New Jersey Department of Environmental Protection
Facility Profile (General)

Facility Name (AIMS): DRP Gibbstown Logistics Center

Facility ID (AIMS): 56309

Street 200 NORTH REPAUNO AVE
Address: GIBBSTOWN, NJ 08027

Mailing 200 NORTH REPAUNO AVE
Address: GIBBSTOWN, NJ 08027

County: Gloucester
Location
Description:

State Plane Coordinates: X-Coordinate: Y-Coordinate: Units: Datum: Source Org.: Source Type:

Industry: Primary SIC: Secondary SIC: NAICS: 424710
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New Jersey Department of Environmental Protection
Facility Profile (General)

Contact Type: Air Permit Information Contact

Organization: Delaware River Partners LLC

Org. Type: Private

Name: Jimmy Osman

NJ EIN:

Title: VP of Engineering & Development

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Fax: () - x

45th Floor

Other: (609) 970-3947 x

Gibbstown, NJ 08027

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Organization: Ramboll

Org. Type: Corporation

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Other: () - x

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Type:

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Contact Type: Fees/Billing Contact

Organization: Delaware River Partners LLC

Org. Type: Private

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NJ EIN:

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GIBBSTOWN, NJ 08027

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**New Jersey Department of Environmental Protection
Facility Profile (General)**

Contact Type: Responsible Official

Organization: Delaware River Partners LLC

Org. Type: Private

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NJ EIN:

Title: President

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Other: (904) 607-6145 x

Type: Mobile

Email: glewis@repauno.com

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**New Jersey Department of Environmental Protection
Equipment Inventory**

Equip. NJID	Facility's Designation	Equipment Description	Equipment Type	Certificate Number	Install Date	Grand-Fathered	Last Mod. (Since 1968)	Equip. Set ID
E1	Cavern	Hard Rock Cavern	Storage Vessel			No		
E2	Rail LR 1	Rail Loading Rack 1	Other Equipment			No		
E3	Rail LR 2	Rail Loading Rack 2	Other Equipment			No		
E4	Rail LR 3	Rail Loading Rack 3	Other Equipment			No		
E5	Rail LR 4	Rail Loading Rack 4	Other Equipment			No		
E6	Rail LR 5	Rail Loading Rack 5	Other Equipment			No		
E7	Rail LR 6	Rail Loading Rack 6	Other Equipment			No		
E8	Truck LR 1	Truck Loading Rack 1	Other Equipment			No		
E9	Truck LR 2	Truck Loading Rack 2	Other Equipment			No		
E10	Rail LR 7	Rail Loading Rack 7	Other Equipment			No		
E11	Rail LR 8	Rail Loading Rack 8	Other Equipment			No		
E12	Dock 1	Marine Loading Dock	Other Equipment			No		

New Jersey Department of Environmental Protection
Control Device Inventory

CD NJID	Facility's Designation	Description	CD Type	Install Date	Grand-Fathered	Last Mod. (Since 1968)	CD Set ID
CD2	Flare 2	Flare 2	Flare		No		
CD3	Flare 3	Flare 3	Flare		No		

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DELAWARE RIVER PARTNERS LLC (56309)
PCP190002

Date: 2/27/2020

New Jersey Department of Environmental Protection
Emission Points Inventory

PT NJID	Facility's Designation	Description	Config.	Equiv. Diam. (in.)	Height (ft.)	Dist. to Prop. Line (ft)	Exhaust Temp. (deg. F)			Exhaust Vol. (acfm)			Discharge Direction	PT Set ID
							Avg.	Min.	Max.	Avg.	Min.	Max.		
PT2	F Stack 2	Flare Stack 2	Round	84	45	500		0.0	1,500.0		0.0	81,074.0	Up	
PT3	F Stack 3	Flare Stack 3	Round	120	50	500		0.0	1,400.0		0.0	182,778.0	Up	

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New Jersey Department of Environmental Protection
Emission Unit/Batch Process Inventory

U 1 HRC Operation of Hard Rock Cavern and LPG Railcar Unloading Facility

UOS NJID	Facility's Designation	UOS Description	Operation Type	Signif. Equip.	Control Device(s)	Emission Point(s)	SCC(s)	Annual Oper. Hours		VOC Range	Flow (acfm)		Temp. (deg F)	
								Min.	Max.		Min.	Max.	Min.	Max.
OS1	Filling HRC	Initial Filling the Hard Rock Cavern	Normal - Steady State	E1	CD2 (P) CD3 (S)	PT2 PT3	4-07-999-99	8,760.0		H	540.0	65.0	65.0	
OS2	Rail 1	Rail LR 1	Normal - Steady State	E2	CD2 (P) CD3 (S)	PT2 PT3	4-07-999-99	8,760.0		H	540.0	0.0	100.0	
OS3	Rail 2	Rail LR 2	Normal - Steady State	E3	CD2 (P) CD3 (S)	PT2 PT3	4-07-999-99	8,760.0		H	540.0	0.0	100.0	
OS4	Rail 3	Rail LR 3	Normal - Steady State	E4	CD2 (P) CD3 (S)	PT2 PT3	4-07-999-99	8,760.0		H	540.0	0.0	100.0	
OS5	Rail 4	Rail LR 4	Normal - Steady State	E5	CD2 (P) CD3 (S)	PT2 PT3	4-07-999-99	8,760.0		H	540.0	0.0	100.0	
OS6	Rail 5	Rail LR 5	Normal - Steady State	E6	CD2 (P) CD3 (S)	PT2 PT3	4-07-999-99	8,760.0		H	540.0	0.0	100.0	
OS7	Rail 6	Rail LR 6	Normal - Steady State	E7	CD2 (P) CD3 (S)	PT2 PT3	4-07-999-99	8,760.0		H	540.0	0.0	100.0	
OS8	Truck 1	Truck LR 1	Normal - Steady State	E8	CD2 (P) CD3 (S)	PT2 PT3	4-07-999-99	8,760.0		H	540.0	0.0	100.0	
OS9	Truck 2	Truck LR 2	Normal - Steady State	E9	CD2 (P) CD3 (S)	PT2 PT3	4-07-999-99	8,760.0		H	540.0	0.0	100.0	
OS10	Depressure	Rail LR 7 Railcar Depressurizing	Normal - Steady State	E10	CD2 (S) CD3 (P)	PT2 PT3	4-08-999-99 4-08-800-01	8,760.0		H	540.0	0.0	100.0	
OS11	Depressure	Rail LR 8 Railcar Depressurizing	Normal - Steady State	E11	CD2 (S) CD3 (P)	PT2 PT3	4-08-999-99 4-08-800-01	8,760.0		H	540.0	0.0	100.0	
OS12	Therm Relief	Thermal Relief of Transfer Lines	Maintenance	E12	CD2 (S) CD3 (P)	PT2 PT3	4-08-800-01	8,760.0		H	787.0	0.0	100.0	

DELAWARE RIVER PARTNERS LLC (56309)
 PCP190002

Date: 2/27/2020

New Jersey Department of Environmental Protection
 Emission Unit/Batch Process Inventory

U 1 HRC Operation of Hard Rock Cavern and LPG Railcar Unloading Facility

UOS NJID	Facility's Designation	UOS Description	Operation Type	Signif. Equip.	Control Device(s)	Emission Point(s)	SCC(s)	Annual Oper. Hours		VOC Range	Flow (acfm)		Temp. (deg F)	
								Min.	Max.		Min.	Max.	Min.	Max.
OS13	Maint	Maintenance Activities	Maintenance	E12	CD2 (S) CD3 (P)	PT2 PT3	4-08-800-01	8,760.0		H	787.0	0.0	100.0	
OS14	Marine LDG	Loading of Marine Vessel from Railcar or Cavern	Malfunction	E12	CD2 (S) CD3 (P)	PT2 PT3	4-08-800-01 4-08-999-96	8,760.0		H	787.0	68.0	68.0	

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