



## **GROUP AGAINST SMOG & POLLUTION**

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February 14, 2019

### **VIA EMAIL**

Allegheny County Health Department  
Air Quality Program  
301 39th St., Bldg. 7  
Pittsburgh, PA 15201  
aqpermits@alleghenycounty.us

**Re: Comments of Group Against Smog and Pollution, Regarding the  
Draft Title V Operating Permit for Buckeye Terminals - Coraopolis  
(Permit # 0040)**

Dear Sir or Madam:

Please accept these comments regarding the draft Title V Operating Permit (# 0040) for Buckeye Terminals - Coraopolis (the "Facility"), which I am submitting on behalf of the Group Against Smog and Pollution ("GASP"). According to the notice posted on its website, the Allegheny County Health Department is accepting comments on the Permit through February 14, 2019.

Very truly yours,

/s

John K. Baillie  
Senior Attorney

**COMMENTS OF THE GROUP AGAINST SMOG AND POLLUTION  
REGARDING THE DRAFT TITLE V OPERATING PERMIT FOR  
BUCKEYE TERMINALS – CORAOPOLIS (#0040)**

**I. ERRONEOUS INTERNAL REFERENCES IN SECTIONS V.A AND V.B OF THE PERMIT SHOULD BE CORRECTED**

In sections V.A.2, V.A.3, V.A.4, and V.A.5 of the Permit there are numerous internal references to limitations, conditions, and requirements in section V.B of the Permit. It appears that those references are erroneous and should be made instead to limitations, conditions, and requirements in section V.A of the Permit. If so, they should be corrected.

Similarly, section V.B of the Permit contains numerous internal references to limitations, conditions, requirements in section V.A. of the Permit. It also appears that those references are erroneous and should be made instead to limitations, conditions, and requirements in section V.B of the Permit. If so, they should also be corrected.

**II. SECTIONS V.A.1 AND V.B.1 OF THE PERMIT SHOULD INCORPORATE THE REQUIREMENTS IMPOSED BY 40 C.F.R. §§ 11086(a) AND 11086(d)**

The review memo for the Permit correctly states that the Facility is subject to 40 C.F.R. Part 63 Subpart BBBBBB (“Subpart BBBBBB”). However, it does not appear that all of Subpart BBBBBB’s requirements have been incorporated into sections V.A.1 and V.B.1 of the Permit. Specifically, sections V.A.1 and V.B.1 of the Permit do not appear to incorporate the requirements that are imposed by 40 C.F.R. § 63.11086(a), which generally requires the use of submerged filling to load storage and cargo tanks at a subject facility, and 40 C.F.R. § 63.11086(d), which prohibits the handling of gasoline in a manner that would result in an extended release of vapor into the atmosphere. Provided that there is not some reason why those

requirements of Subpart BBBBBB do not apply to the Facility, they should be incorporated into sections V.A.1 and V.B.1 of the Permit.