



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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Date Stamped: April 7, 2014

Mr. John Lyle
Swissport Fueling, Inc.
2 Neptune Road, Suite 414
East Boston, Massachusetts 02128

RE: EAST BOSTON
Transmittal No.: X258589
Application No.: *NE-14-001*
Class: *BLWAQ*
FMF No.: *326060*
**AIR QUALITY PLAN
APPROVAL**

Dear Mr. John Lyle:

The Massachusetts Department of Environmental Protection (“MassDEP”), Bureau of Waste Prevention, has reviewed your Limited Plan Application (“Application”) listed above. This Application concerns the operation of Swissport Fueling, Inc.’s (“Swissport”) existing fuel distribution (primarily Jet-A type fuel for aircraft) and fuel storage facilities (“Facility”) which results in the emission of volatile organic compounds (VOC). Your Facility is located at Logan International Airport in East Boston, Massachusetts..

This Application was submitted in accordance with 310 CMR 7.02 Plan Approval and Emission Limitations as contained in 310 CMR 7.00 “Air Pollution Control,” regulations adopted by MassDEP pursuant to the authority granted by Massachusetts General Laws, Chapter 111, Section 142 A-J, Chapter 21C, Section 4 and 6, and Chapter 21E, Section 6. MassDEP’s review of your Application has been limited to air pollution control regulation compliance and does not relieve you of the obligation to comply with any other regulatory requirements.

MassDEP has determined that the Application is administratively and technically complete and that the Application is in conformance with the Air Pollution Control regulations and current air pollution control engineering practice, and hereby grants this **Plan Approval** for said Application, as submitted, subject to the conditions listed below.

Please review the entire Plan Approval, as it stipulates the conditions with which the Facility owner / operator (“Permittee”) must comply in order for the Facility to be operated in compliance with this Plan Approval.

1. DESCRIPTION OF FACILITY AND APPLICATION

Swissport (“the Permittee”) operates Jet fueling and storage operations at Logan International Airport (Logan), which is owned and operated by the Massachusetts Port Authority (Massport). Bosfuel, a consortium of tenants at Logan, leases and operates the fuel storage facility and fuel distribution system. Bosfuel has contracted with Swissport to manage daily operations of the fuel facility.

Jet-A fuel is delivered to the facility primarily via pipeline but can be supplied via tanker truck in the event the pipeline is nonoperational. Jet-A fuel is stored in four 1,800,000 gallon above ground storage tanks (AST). Swissport dispenses Jet-A fuel to aircraft through an underground hydrant fuel distribution system or by mobile refueling vehicles. Swissport also stores gasoline and diesel fuel in underground storage tanks (UST) and dispenses them for use in ground service equipment at Logan.

The storage tanks for Jet-A fuel and gasoline storage and loading are approved in Final Approval MBR-96-IND-028, issued on August 30, 1996. The Approval limits VOC emissions from the four Jet-A fuel storage tanks to 4.0 tons per year. Gasoline related operations must comply with Regulation 310 CMR 7.24 Organic Material Storage and Distribution.

Diesel Storage and distribution operations are exempt from the need to acquire Approvals from MassDEP as per 310 CMR7.02(b)(11) and 310 CMR 7.02(b)(13)

The Permittee has proposed to limit VOC emissions from the Jet-A refueling system to less than or equal to 4.0 tons per year. In addition, the Permittee has proposed that Approval MBR-96-IND-028, issued on August 30, 1996 to Massport, be transferred to Swissport and VOC emissions from the four Jet-A fuel storage tanks continue to be limited to 4.0 tons per year, as prescribed in said Approval.

2. EMISSION UNIT (EU) IDENTIFICATION

Emission Unit (EU) identified in Table 1 is subject to and regulated by this Plan Approval:

Table 1			
EU#	Description	Design Capacity	Pollution Control Device (PCD)
EU5	Jet-A hydrant fueling system	14,000 gallons per minute	Best Management Practices

Table 1 Key:

EU# = Emission Unit Number

VOC = Volatile Organic Compounds

Jet-A Fuel = Aviation fuel used in turbine engines

3. APPLICABLE REQUIREMENTS

A. OPERATIONAL, PRODUCTION AND EMISSION LIMITS

The Permittee is subject to, and shall not exceed the Operational, Production, and Emission Limits as contained in Table 2, below:

Table 2			
EU#	Operational / Production Limit	Air Contaminant	Emission Limit
EU5	36 million gallons per month of Jet-A.	VOC (Emitted at a rate of 0.0159 lbs per 1000 gallons)	0.33 TPM
	436 million gallons per year of Jet-A.		4.0 TPY

Table 2 Key:

EU# = Emission Unit Number

VOC = Volatile Organic Compounds

TPM = tons per month

TPY = tons per consecutive 12-month period

Note: Jet-A throughput limits include both the hydrant system and the mobile Re-fuelers component of the fueling operations.

B. COMPLIANCE DEMONSTRATION

The Permittee is subject to, and shall comply with, the monitoring, testing, record keeping, and reporting requirements as contained in Tables 3, 4, and 5 below:

Table 3	
EU#	Monitoring and Testing Requirements
EU5	1. The Permittee shall monitor Jet-A fuel throughput continuously throughout the day for both receipt and consumption using a continuous electronic data logger VOC emissions shall be calculated using this throughput data such that the compliance status with the emission limits contained in Table 2 above may be determined.
Facility-wide	2. If and when MassDEP requires it, the Permittee shall conduct emission testing in accordance with USEPA Reference Test Methods and Regulation 310 CMR 7.13.

Table 3 Key:

EU# = Emission Unit Number

VOC = Volatile Organic Compounds

USEPA = United States Environmental Protection Agency

Table 4	
EU#	Record Keeping Requirements
Facility- Wide	1. The Permittee shall maintain adequate records on-site to demonstrate compliance status with all operational, production, and emission limits contained in Table 2 above. Records shall also include the actual emissions of VOC emitted for each calendar month and for each consecutive twelve month period (current month plus prior eleven months). These records shall be compiled no later than the 15 th day following each month. An electronic version of the MassDEP approved record keeping form, in Microsoft Excel format, can be downloaded at http://www.mass.gov/dep/air/approvals/aqforms.htm#report .
	2. The Permittee shall maintain records of monitoring and testing as required by Table 3.
	3. The Permittee shall maintain a copy of this Plan Approval, underlying Application and the most up-to-date SOMPs for the EU approved herein on-site.
	4. The Permittee shall maintain a record of routine maintenance activities performed on the approved the subject emission unit and monitoring equipment. The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.
	5. The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years.
	6. The Permittee shall make records required by this Plan Approval available to MassDEP and USEPA personnel upon request.

Table 4 Key:

EU# = Emission Unit Number

VOC = Volatile Organic Compounds

SOMPs = Standard Operating and Maintenance Procedures

USEPA = United States Environmental Protection Agency

Table 5	
EU#	Reporting Requirements
Facility-wide	1. The Permittee shall submit to MassDEP all information required by this Plan Approval over the signature of a “Responsible Official” as defined in 310 CMR 7.00 and shall include the Certification statement as provided in 310 CMR 7.01(2)(c).
	2. The Permittee shall notify the Northeast Regional Office of MassDEP, BWP Permit Chief by email at nero.air@state.ma.us or fax 978-694-3499 as soon as possible, but no later than one (1) business day after discovery of any exceedance(s) of Table 2 requirement(s). A written report shall be submitted to the BWP Permit Chief within three (3) business days thereafter and shall include: identification of exceedance(s), duration of exceedance(s), reason for the exceedance(s), corrective actions taken, and action plan to prevent future exceedance(s).
	3. The Permittee shall provide a copy to MassDEP of any record required to be maintained by this Plan Approval within 30 days from MassDEP’s written request.
	4. The Permittee shall submit to MassDEP for approval a stack emission pretest protocol, at least 60 days prior to emission testing, for any emission testing as defined in Table 3 Monitoring and Testing Requirements.
	5. The Permittee shall submit to MassDEP a final stack emission test results report, within 45 days after emission testing, for any emission testing as defined in Table 3 Monitoring and Testing Requirements.

Table 5 Key:

EU# = Emission Unit Number

CMR = Code of Massachusetts Regulations

BWP = Bureau of Waste Prevention

4. SPECIAL TERMS AND CONDITIONS

The Permittee is subject to, and shall comply with, the following special terms and conditions:

- A. The Permittee shall comply with the Special Terms and Conditions as contained in Table 6 below:

Table 6	
EU#	Special Terms and Conditions
EU5	1. The Permittee shall operate the Jet-A fueling system following Best Management Practices and in accordance with manufacturers recommendations so as to maintain efficient operation and minimize emissions of VOC.
Facility-Wide	2. The Permittee shall continue to operate the Jet-A storage tanks in accordance with Final Approval MBR-96-IND-028, dated August 30, 1996.

Table 6 Key:

EU# = Emission Unit Number

VOC = Volatile Organic Compounds

5. GENERAL CONDITIONS

The Permittee is subject to, and shall comply with, the following general conditions:

- A. Pursuant to 310 CMR 7.01, 7.02, 7.09 and 7.10, should any nuisance condition(s), including but not limited to smoke, dust, odor or noise, occur as the result of the operation of the Facility, then the Permittee shall immediately take appropriate steps including shutdown, if necessary, to abate said nuisance condition(s).
- B. If asbestos remediation/removal will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that all removal/remediation of asbestos shall be done in accordance with 310 CMR 7.15 in its entirety and 310 CMR 4.00.
- C. If construction or demolition of an industrial, commercial or institutional building will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that said construction or demolition shall be done in accordance with 310 CMR 7.09(2) and 310 CMR 4.00.
- D. Pursuant to 310 CMR 7.01(2)(b) and 7.02(7)(b), the Permittee shall allow MassDEP and/or USEPA personnel access to the Facility, buildings, and all pertinent records for the purpose of making inspections and surveys, collecting samples, obtaining data, and reviewing records.
- E. This Plan Approval does not negate the responsibility of the Permittee to comply with any other applicable Federal, State, or local regulations now or in the future.
- F. Should there be any differences between the Application and this Plan Approval, the Plan Approval shall govern.
- G. Pursuant to 310 CMR 7.02(3)(k), MassDEP may revoke this Plan Approval if the construction work is not commenced within two years from the date of issuance of this Plan Approval, or if the construction work is suspended for one year or more.
- H. This Plan Approval may be suspended, modified, or revoked by MassDEP if MassDEP determines that any condition or part of this Plan Approval is being violated.
- I. This Plan Approval may be modified or amended when in the opinion of MassDEP such is necessary or appropriate to clarify the Plan Approval conditions or after consideration of a written request by the Permittee to amend the Plan Approval conditions.

- J. The Permittee shall conduct emission testing, if requested by MassDEP, in accordance with USEPA Reference Test Methods and regulation 310 CMR 7.13. If required, a pretest protocol report shall be submitted to MassDEP at least 30 days prior to emission testing and the final test results report shall be submitted within 45 days after emission testing.
- K. Pursuant to 310 CMR 7.01(3) and 7.02(3)(f), the Permittee shall comply with all conditions contained in this Plan Approval. Should there be any differences between provisions contained in the General Conditions and provisions contained elsewhere in the Plan Approval, the latter shall govern.

6. MASSACHUSETTS ENVIRONMENTAL POLICY ACT

MassDEP has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Energy & Environmental Affairs, for air quality control purposes, was not required prior to this action by MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act (MEPA) and 301 CMR 11.00, Section 11.04, provide certain “Fail-Safe Provisions,” which allow the Secretary to require the filing of an ENF and/or an Environmental Impact Report (EIR) at a later time.

7. APPEAL PROCESS

This Plan Approval is an action of MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date of issuance of this Plan Approval.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts, which are the grounds for the request, and the relief sought. Additionally, the request must state why the Plan Approval is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to the Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) must be mailed to:

Commonwealth of Massachusetts
Department of Environmental Protection
P.O. Box 4062
Boston, MA 02211

This request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below. The filing fee is not required if the appellant is a city or

town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

MassDEP may waive the adjudicatory hearing-filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

Should you have any questions concerning this Plan Approval, please contact Mr. Thomas Hannah by telephone at 978-694-3287, or in writing at the letterhead address

Very truly yours

Thomas A. Hannah
Environmental Engineer

This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead.

James Belsky
Permit Chief
Bureau of Waste Prevention

cc: boardofhealth@bphc.org
JenniferR.bfd@ci.boston.ma.us (Boston Fire Department)
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cc:MassDEP/NERO- Marc Altobelli, Mary Persky, Tom Hannah