

From: [Dawn Ellen Kirkland](#)
To: [DEP, Air-Global](#)
Subject: Make Tank Farms Safe...or just go away....
Date: Friday, September 25, 2020 4:42:38 PM

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To Whom It Concerns,

My family and I are residents of South Portland, Maine. We and all of our neighbors in Willard Beach neighborhood and surrounding neighborhoods are affected by Global's emissions and by the state's failure to require this Fortune 500 company to do more to safeguard our health as residents.

All of the tank farms in the state should be required to have 24/7 continuous monitoring and control their emissions, using the most effective technology available.

These emissions increase the City residents' risk of cancer, hospital admissions, and emergency room visits for asthma and other adverse respiratory and health outcomes. Further, because the emission sources are next to our homes, schools & parks, health impacts would be most acutely felt by children, the elderly, pregnant women, and other vulnerable people in our community.

Both major and minor emitters should be required to have emission capturing equipment installed on their tanks. Technology exists to effectively measure/monitor emissions and to control up to 95% of emissions. It should be required to utilize this technology as a responsibility of being allowed to do business in Maine. It is not reasonable to expect our community to subsidize their profits at the expense of our health.

If these tank farms must stay here in South Portland, please do everything possible to make sure we are all safe from their emissions here in South Portland. As a community, we do not care about the subsidies from these oil companies--we would ALL

prefer it if all the oil tanks were all removed. South Portland is mostly residential and should no longer have industrial landscapes in the middle of our homes and schools. The city can bring in revenue from other more suitable businesses and should remove such archaic businesses from our modern neighborhoods and consequently from our visual landscapes and the air we breathe.

**Thank you,
Dawn Ellen Kirkland**

From: [susan henderson](#)
To: [DEP, Air-Global](#)
Subject: South Portland air
Date: Monday, September 28, 2020 10:42:03 AM

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To the Maine DEP:

The air that we breathe is critical to our growth, development and health. Adverse effects of pollution were not understood years ago when the petroleum industry came to our city. Now we know that toxins have pervasive effects on living organisms and we know that we will continue to understand more.

While odors are offensive, we understand that odors can be removed while toxic emissions remain. We want toxic emissions greatly reduced or eliminated. There is evidence that the odor reducing device proposed may not control toxic emissions, and may make their measurement more difficult. We want best practices used.

If Global is a minor emitter, they are not required to use best practices. It appears likely that Global is a major emitter and is concealing that fact by the way they calculate, test and report.

Testing needs to:

- Be done by an independent group and validated by a certified Maine engineer.
- Be done more than once a year
- Not give the company the chance to prepare for it
- Be done at the fence line to identify risk to direct neighbors
- Validate the effectiveness of the carbon scrubber to remove VOCs

We expect the health of our citizens to be addressed in a serious and honest manner. We are concerned with VOCs and HAPS. The Clean Air Advisory Committee has done an excellent job in analyzing issues. There is no reason to accept that the oil companies have the best interest of the public at heart or can be trusted to do their own testing. The EPA and Global speak in careful legal language and the elephant remains standing in the room: we are being poisoned for profit as we and our planet die. Please help us deal with this. It is time to speak truth to power; integrity may be the major power we have.

Sincerely,
Susan Henderson
South Portland

Sent from [Mail](#) for Windows 10

From: [Mina Wade](#)
To: [DEP, Air-Global](#)
Subject: Tank Farms in South Portland
Date: Monday, September 28, 2020 8:07:01 PM

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To all that it may concern-

I am a very concerned community member near the tank farms in South Portland. I have 2 small children, one in Kindergarten and one who will hopefully be a South Portland school district student in 2 years. I moved back to Maine from a larger city where air quality was quite concerning. We chose the Willard Square area for its walkability, family-oriented community and proximity to the ocean. Once we were here, we found out about the poor air-quality surrounding our community in South Portland. As you can probably imagine, we are very disappointed.

What is even more concerning to us is the general lack of concern for the citizens of the community that both companies like Global and Sprague AND the Maine DEP have shown. How is it that the community members are having to be the ones to hold, or TRY to hold, these companies accountable? Why is it okay, that just because we have fewer citizens, we, as a state, are allowing companies to emit higher levels of pollutants?

My family and I want to stay here. We love the community, but I am not willing to sacrifice the health of my kids for this town. If this town and this state doesn't put our health first, I want no part of this community.

Please take action:

- Require 24/7 emission monitoring.
- Lower allowable emission levels to match those of Massachusetts and New York
- Require that Global's emitter status be on that of its spike emissions, not on an average.

Please take care of us, so that we can take care of and live in Maine.

Thank you,

One of your very concerned community members,

Serena Wade

46 Pillsbury St, South Portland, ME 04106

From: [Pamela White](#)
To: [DEP, Air-Global](#)
Subject: South Portland
Date: Monday, October 05, 2020 12:19:21 PM

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We have had very hard to breathe smells to the point where we've had to disappointingly shut the windows in summer in the Ferry Village neighborhood of So. Portland, ME. The city hall didn't know what it was and there as no Clean Air Act committee at the time. Ultimately, it was found that something going on with the tanks is the culprit.

Walking the cemetery that goes by the tanks in another part of So. Portland, the smell is offensive. My friend, who lives over there says it's the tanks.

Please don't forget about all the tanks in So. Portland and not just the ones most talked about. Please don't forget about our neighbors across the way in Portland, who also get bad fumes.

Thank you, Pamela White
(207)228-5890

From: [Anna O'Sullivan](#)
To: [DEP, Air-Global](#)
Subject: Global emissions
Date: Tuesday, October 13, 2020 8:05:31 AM

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning,

My name is Anna O'Sullivan, and I live in very close proximity to the south Portland tanks with my two year old son. Since becoming aware of the dangers behind the emissions I was regularly smelling, I've been following the issue closely. I've experienced very frequent headaches, eye and throat irritation, and a new level of anxiety about having the windows of my home open on a beautiful day. I love my home and my community, but remaining here with the growing knowledge about the toxic air my innocent son is being subjected to, fills me with guilt. I'm still hopeful that the DEP will do the right thing for the people in the community here and commit to upholding the following standards.

Emissions Testing: It is so encouraging that the DEP plans to require that Global conduct actual emissions testing on its heated tanks. Transparency is an important first step. We would like to see the state do more:

The draft license requires testing every 12-14 months. That is not frequent enough. Testing should be done at the very least, every six months, as the MassDEP requires of Global's tanks in Massachusetts which are also considered minor emitters.

The license should require that any periodic emissions tests should be conducted by a third party and their results made public in a timely manner.

Emissions Controls: Global is installing a mist eliminator, as required by the consent decree. It also plans to install a carbon bed to reduce "odorous compounds." It's an important step to have this carbon scrubber in place, as the beginning of real emissions control. But it also raises really critical questions:

The license calls this scrubber an odor control device. DEP states that it does not regulate odors, so it has no oversight authority with regard to its operation. We want to be really clear about what this is: a shell game. Global does not want to acknowledge that this is an emissions capture system, presumably because doing so would acknowledge that they have problematic emissions that require capturing. If the carbon bed were included in the license as an emissions control device, its operation would be subject to oversight by regulators, including proof that it works. It also would have required that Global apply for a fuller license amendment

with more scrutiny by the DEP. The DEP acted against public interest when it accepted Global's assessment that such a review wasn't warranted.

In 2002, Global installed a carbon bed at its tank operation in Chelsea, Mass. It didn't work, and the Mass DEP required that the company replace it with a different technology, a regenerative thermal oxidizer (RTO). How can we be sure the carbon bed will be effective here? Will the Maine DEP consult with staff at the Mass DEP about what went wrong with the carbon beds and whether the RTO has been effective in controlling emissions (or odors)?

It is important that the emissions be measured both before & after it goes through the carbon scrubber to determine the effectiveness of the equipment.

The amount of Benzene, a cancer causing chemical, allowed in Maine is ten times higher than the amount that is allowed in New York or Massachusetts.

Can Maine invoke stricter controls on Benzene emissions?

Synthetic Minor Status: In Maine, facilities that have a potential to emit more than 50 tons of VOCs per year are considered major emitters, and subject to emissions testing and control. Yet many facilities, including Global, get around those requirements by being classified as a "synthetic minor," meaning they agree to state permits that assert certain limits on their operations to hypothetically keep them below that 50 ton threshold. In Global's case, one of those limits was the facility's total allowable VOC emissions per year: 21.9 tons. Yet, the EPA found that the company had the potential to emit at such a high rate from its heated tanks that compliance with that limit would have been impossible and was not being monitored with actual testing. This license update imposes another "synthetic minor limitation", by for the first time saying how much product the company can move each year. But the new throughput limit is actually many times higher than the company's actual annual operations, making it no limit at all. Still, the DEP relies on both factors to reaffirm Global's status as a synthetic minor emitter.

Using the emission data from 2012/2013 can you produce your calculations including the assumptions about "limits" that result in Global being designated a "synthetic" minor emitter? The EPA used that same data to determine that Global had potential to emit over 50 million tons per year which would qualify them as a major emitter.

Why does that status matter? For a few reasons, but here's a really important one: If Global were classified as a major emitter, it would be required to account for—and control—the bursts in emissions that occur when it fills tanks, the ones we smell and are causing adverse health

symptoms. A facility's status as a major emitter is based on its potential to emit, meaning at its highest capacity. The state's limit on Global as a synthetic minor emitter is based on total annual emissions, meaning it doesn't account for spikes. Given the seasonality of operations there, Global might technically be able to stay within such a limit while still exposing its neighbors to huge doses of toxic emissions throughout the spring and summer. The state should be required to justify Global's status as a synthetic minor.

Other states and towns have enacted stricter standards for these huge oil companies, I hope that Maine will show the same level of commitment to both our local environment and the planet's health a whole. The technology exists, and Global (as well as the other major emitters in our midst) can absolutely afford to implement it. Please please please show up for South Portland.

Thanks for your time.
Sincerely,
Anna and Henry

From: [Morelli, Scott](#)
To: [DEP, Air-Global](#)
Cc: [dplumb](#); ["Adrian P. Kendall"](#); [Caricchio, April](#); [Morgan, Claude](#); [Dhalac, Deqa](#); [Bruzgo, Katelyn](#); [katewhitelewis@gmail.com](#); [Pride, Misha](#); [Henderson, Susan](#); [Anthony Moffa](#); [Brienne Hicknell](#); [Josh Cutler](#); [Rebecca Boulos](#); [Tom Mikulka](#)
Subject: Comments on Draft Global Air Emissions License
Date: Wednesday, October 14, 2020 11:35:29 AM
Attachments: [Letter - DEP - Draft Global License 101420.pdf](#)

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Please see the attached comments from the City of South Portland.

Thank you,
Scott

NOTICE: Under Maine's Freedom of Access ("Right-to-Know") law, documents - including e-mail - in the possession of public officials about City business are classified as public records. This means if anyone asks to see it, we are required to provide it. There are very few exceptions. We welcome citizen comments and want to hear from our residents, but please keep in mind that what you write in an e-mail is not private and could show up in the local newspaper.

From: [Lauren Glennon](#)
To: [DEP, Air-Global](#)
Subject: Maine Department of Environmental Protection + Global Oil
Date: Wednesday, October 14, 2020 12:12:34 PM

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Maine Department of Environmental Protection,

I'm writing to share my voice and that I SUPPORT the Clean Air Advisory Committee's recommendations and hope you will support them as well. I am a mother of 3 boys, our family lives in nearby Cape Elizabeth. We are constantly outdoors here in Maine, aware of the connectedness of our environment to all ecosystems and long-term health.

I write to advocate that you, on local citizen's behalf:

PLEASE ensure that Global's odor controls also reduce harmful compounds such as VOCs and HAPs.

PLEASE include in the license a requirement to control this testing periodically on both ends of the odor control system.

PLEASE set Global's emissions limits by conducting performance tests and setting the emissions factors before vapors enter the system.

PLEASE include in Global's license a requirement for Global to report amounts, types and timing of solvents or other substances that are added to the asphalt or fuel oil, including substances that were added prior to receiving the hydrocarbons at the facility. PLEASE enforce reporting to the public about Global's performance.

PLEASE incorporate into the license the operation of the odor control system(s)

PLEASE require the operation of any such system at all times, in compliance with an Operation & Maintenance plan approved by the EPA.

PLEASE test emissions regularly, not annually.

We are grateful for your work and commitment to our environment. I know Global will have big law firms fighting for their profits, but I have confidence in the PEOPLE of Maine having YOU on our side.

Thank you for your time and efforts!

Best regards,

Lauren Glennon
6 Cranbrook Drive
Cape Elizabeth, Maine 04107

From: [Cook, Emily](#)
To: [DEP, Air-Global](#)
Subject: Comments from Sen. Millett
Date: Wednesday, October 14, 2020 3:53:55 PM
Attachments: [Millett comments 10.14.2020.pdf](#)

Hello,

Attached please find comments from South Portland's State Senator, Sen. Rebecca Millett. Please let me know if you have any difficulties with the document.

Thank you,
Emily

Emily F. Cook

Senior Legislative Aide
Senate Majority Office
3 State House Station
Augusta, Maine 04333
207-287-1515

From: [Sandy Shapiro](#)
To: [DEP, Air-Global](#)
Subject: Protecting Our Air
Date: Wednesday, October 14, 2020 9:53:46 AM

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good Morning,

My husband, daughter and I are residents of Cape Elizabeth. I have spent my life here in Maine. It has always been tempting to move somewhere exotic and new, but the quality of life here is a hard thing to move away from, especially since having our daughter. I look around the world, and our nation for that matter, and feel such sadness for what people have to endure in their environments...fires, toxins in their water supplies, toxins in their air. Maine feels like a sanctuary for the people who live here. We have good water, lots of forests, and our air is breathable. I desperately hope to have agencies in place that work as gatekeepers to these natural resources we NEED so much for our citizens to grow in a healthy, vibrant way. Money is a powerful force for people to make decisions which disregard human health. It's horrible, but true, and I think it's clear Global is disregarding human health, and the consequences of its operations. I want to feel comfortable seeing my daughter at the beach taking big deep breaths of salt air...I want to feel comfortable riding our bikes, and walking the coastline without worrying about toxic compounds filling our lungs,

I am asking you to be the defenders of the air our families breathe, because there is no alternative source for good air, we all need it, and it should be protected as the precious resource it is. People are moving to Maine in droves because they too see what we have here. PLEASE know as local community members, who hope our children will also decide to stay in Maine, we SUPPORT the **Clean Air Advisory Committee's** recommendations and hope you will support them as well. We CANNOT be too protective at this point in time when it comes to the air we breathe.

PLEASE ensure that Global's odor controls also reduce harmful compounds such as VOCs and HAPs.

PLEASE include in the license a requirement to control this testing periodically on both ends of the odor control system.

PLEASE set Global's emissions limits by conducting performance tests and setting the emissions factors before vapors enter the system.

PLEASE include in Global's license a requirement for Global to report amounts, types and timing of solvents or other substances that are added to the asphalt or fuel oil, including substances that were added prior to receiving the hydrocarbons at the facility. PLEASE enforce reporting to the public about Global's performance.

PLEASE incorporate into the license the operation of the odor control system(s)

PLEASE require the operation of any such system at all times, in compliance with an Operation & Maintenance plan approved by the EPA.

PLEASE test emissions regularly, not annually.

Thank you very much for your time, and effort. We are grateful for your work and commitment to our environment. I know Global will have big law firms fighting for their profits, but I have confidence in the PEOPLE of Maine having YOU on our side.

Very Best,

Sandy

--

[Sandy Shapiro-Hurt](#)
[207-807-8704](tel:207-807-8704)

From: [Elizabeth Sullivan](#)
To: [DEP, Air-Global](#)
Cc: [Elizabeth Sullivan](#)
Subject: Global Emissions - Public Comment
Date: Wednesday, October 14, 2020 12:29:45 AM

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern at the Maine Department of Environmental Protection (Maine DEP):

I am writing to voice my concerns about the serious threat to public health that two corporations continue to pose to residents of South Portland, Maine and surrounding areas. The toxic emissions for which two petrochemical companies, Sprague and Global, have been and continue to be responsible for are a source of great concern to me as someone who has lived in Maine for most of my life and, more recently, as a citizen of South Portland. Honestly, though, this kind of behavior would concern and frustrate me if it happened anywhere in the world. While these two companies have finally been assessed fines as a penalty for violating federal Clean Air Act regulations for more than a decade, the financial burden of those fines is mere pocket-change to corporations of this magnitude, and it is clear that these companies cannot be trusted to take seriously the health of their workers, surrounding communities, or the law. Furthermore, the fact that companies are allowed to “self-report” with considerable discretion in their measurements and calculations (for instance, being allowed to use an industry standard approximation for the vapor pressure of asphalt rather than being required to use their own measured values, a substitution which directly affects measured emissions calculations and determines whether they are within safe parameters) warrants further scrutiny and revision.

We are talking about a very real threat to people’s lives. These are known carcinogens emitted into the air that everyone in the area breathes, and we have a responsibility to each other to hold these companies accountable to the environmental standards that have been so arduously created over time and which you, as an agency, have the honorable but very serious responsibility to implement and enforce.

Briefly and more specifically, I urge you to seriously consider the following:

- To echo a statement made by Protect South Portland, “**both major and minor emitters should be required to have 24/7 monitoring & emission capturing equipment installed on their tanks. Technology exists to effectively measure/monitor emissions and to control up to 95% of emissions.**” Please

require this of Global.

- The mist eliminator that Global is reportedly installing is classified as an “odor eliminator.” The key question is whether this technology adequately serves to reduce toxic emissions. A similar carbon bed installed in a MA facility failed in its emissions-reducing function. What oversight will ensure that any new technology actually reduces emissions?
- Global’s classification as a “minor emitter” is problematic in that it is based on annual emissions, but Global’s processing protocols are highly seasonal and vary greatly throughout the year. In this way, people are being exposed to potentially excessive levels of airborne petrochemical toxins during certain months of the year. This classification is also problematic in that the EPA’s own investigation concluded that Global has the potential to actually be emitting far more than the permissible amount of VOCs for a minor emitter, and, in fact, to actually be emitting as much as a “major emitter” without being subject to the same rules, oversight, and rigorous, frequent testing as any major emitter. The EPA’s study suggests that determining the actual emissions with greater precision is essential to assigning it the appropriate classification and thereby monitoring it safely and appropriately. This relates back to the aforementioned necessity of more precise, more frequent, and more externally supervised and executed measurements of emissions.
-
- This is the work that you have been tasked with as a protector of the environment and, by extension, of the residents and guests of the state of Maine - not just now but in the years to come, as these companies- much like the horrible health problems that their reckless emissions can cause - are not going away and may only reveal themselves to be more detrimental as time goes on if not addressed now. Please accept my gratitude for the critically important work that you do, and please take seriously how important that work is to protecting the environment and to preventing cancer and other deadly and life-altering conditions that these chemicals can cause for the people of Maine.

Thank you for your attention to this extremely important matter.

Sincerely,

Elizabeth Sullivan

7 Ballard St
South Portland, ME 04106

Sullivan.Elizabeth5@gmail.com

207-653-0306

From: [Tom Keefe](#)
To: [DEP, Air-Global](#)
Cc: [Bruce Yates](#)
Subject: Comment - Draft Air License A432-71-P-M
Date: Thursday, October 15, 2020 2:27:18 PM
Attachments: [GBL Comment - Draft Air License A432-71-P-M.pdf](#)

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Dear Sir or Madam

Attached is a letter containing Global Companies comments on Draft Air License A432-71-P-M. If you have any questions, please contact me at 781 398 4132.

Sincerely

Tom Keefe



Tom Keefe
VP EHS Operations
Global Partners LP
O – 781 398 4132
tkeefe@globalp.com

From: [Protect South Portland](#)
To: [DEP, Air-Global](#)
Subject: Comment: Global license, from Protect South Portland
Date: Friday, October 16, 2020 3:14:43 PM

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To Whom It May Concern:

Protect South Portland is writing in support of the comments submitted by the city of South Portland and its Clean Air Advisory Committee. We are a grassroots nonprofit committed to protecting the environment and health and welfare of this community. We have consistently called for accountability and transparency from the oil companies that operate within our neighborhoods and the regulators whose job it is to make sure they operate within the law. We deserve to know what's in the air we breathe and to have faith in the agencies charged with safeguarding the environment and the public health.

We are encouraged that the draft license revision includes mandated emissions testing for Global's facility. While it is baffling to us that such testing is not already required, it is an encouraging first step. We believe the changes proposed by the CAAC would significantly improve that process, specifically mandating that the "odor" control system operate at all times; requiring that Global conduct semi-annual testing; making the results of that testing public in a timely manner; and requiring documentation of any solvents added to heated products. We urge the DEP to clarify in the license what mitigation steps must be taken if Global's testing demonstrates that the company is in violation of its permitted emissions. And, we believe the DEP has not provided adequate justification for Global's designation as a synthetic minor emitter. That designation should be reassessed.

You have heard from us and our neighbors repeatedly now about how emissions from these tank farms impact our lives, about concerns for our own health and our neighbors', and about the anger we felt upon learning that these companies have been violating federal law for years and that the state DEP looked the other way. This license revision begins to make operations at Global more transparent. But it does not go far enough. We continue to believe that Global and all similar tank farms in the state should be required to implement emissions control technology, to be monitored and regulated under their state licenses, as well as continuous emissions monitoring. This is feasible, warranted and necessary to protect the health of our community. We believe no neighborhood in the state of Maine should be allowed to serve as dumping ground for a Fortune 500 corporation making billions of dollars in profits. We hope the Maine DEP, the Maine Legislature and Gov. Janet Mills share this belief and commitment.

Respectfully,

Rachel Burger
President

[Protect South Portland](#)

Website: www.protectsouthportland.org

E-mail: protectsouthportland@gmail.com

Find us on [Facebook](#)

Follow us on [Twitter](#) @ProtectSoPo

Mail: PO BOX 2154, South Portland, ME, 04116-2154

From: [Dave Falatko](#)
To: [DEP, Air-Global](#)
Cc: [Tom Mikulka](#); [Roberta Zuckerman](#); [Judith Kline](#); [Chelsea Conaboy](#); [Lewis, Kate](#); [Millett, Rebecca](#); [Carney, Anne](#)
Subject: public comments on Global's permit renewal
Date: Friday, October 16, 2020 1:05:21 PM
Attachments: [SoPo HEM-3 summary 2020.pdf](#)

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Comments on Global's revised draft air permit A-432-71-P-M:

1. It is a positive step that the DEP is requiring Global to test their emissions and determine VOC emission rates; the details of this testing are not fully presented (subject to DEP approval), but lead to the following comments:
 - a. The highly variable nature of the heated tank emissions caused by seasonal ambient temperature changes, additive addition and subsequent mixing/blending and aeration, and rapid head space displacement when filling tanks due to fixed roofs, all point toward the need for continuous or long-term monitoring of emissions instead of spot testing every 14 months.
 - b. The test methods should be at least as rigorous as the Eastmount testing performed in 2012/2013 and should include analytical methods with continuous monitoring for total volatile organic compounds (VOCs) with a flame ionization detector (FID) or a photo ionization detector (PID), and grab samples for hazardous air pollutants (HAPs) and polycyclic aromatic hydrocarbons (PAHs). Analytical methods for total VOCs, HAPs, and PAHs should be by USEPA methods 25A, TO-15, and TO-13A, respectively, or suitable equivalent methods such as the Air Phase Hydrocarbon (APH) method developed by the Massachusetts DEP.
 - c. Sample ports and instrumentation should be installed on the collection ducts from the heated tanks to monitor pressure/vacuum, temperature, and air flow from each tank individually and combined and before and after any treatment units.
 - d. Samples of the heated tanks products, asphalt and #6 oil, should be analyzed for vapor pressure by standard methods whenever emission testing is done to assess the use of vapor pressure as an indicator of volatility and VOC emissions at higher temperatures.
 - e. It will be more difficult to accurately collect and measure effluent VOCs from the tanks if the open vented hoods proposed by Global are used instead of the consent-decree required pressure/vacuum relief valves (PVRVs) that would create a nearly closed system. The Eastmount testing system installed a temporary total enclosure (TTE) around the tank vents and applied a very slight vacuum (~0.05" water column) to collect all vapors and measure and quantify emission rates. Global's vendor for the hoods has stated that they need to have 0.1" WC to 0.2" WC vacuum applied at the hoods to ensure they capture all emissions. Monitoring this hood vacuum level needs to be written into the permit to ensure that the vacuum applied during operations and emissions testing is sufficient to capture all emissions.
 - f. This testing should be completed by an independent group like Eastmount or others, with data and report compiled and submitted, with review and certification by a Maine Professional Engineer (PE) for independent accountability.
 - g. The details of the test method that are presented describe methods almost identical to those completed by Eastmount for Global's heated tanks in 2012 and 2013. The DEP also states that Global should use the VOC emission factors determined in the 2012/2013 Eastmount testing to estimate their emission factors going forward until new factors are determined. This is tacit acknowledgement by the DEP that directly measuring emissions with the Eastmount testing methods was and is the most appropriate method to determine VOC emissions from these heated tanks.

2. The tacit acknowledgement by the DEP of the Eastmount testing methodology also gives validity to the testing results, which showed much higher levels of VOC emissions from these heated tanks than was previously acknowledged or reported. The USEPA used these results to determine that Global had the potential to emit VOCs at rates greater than 50 tons per year and should be classified as a major source of VOC emissions; this was the basis of the civil suit against Global. Global has the potential for short-term high rates of VOC emissions due to variable conditions noted in 1) a, above. The DEP grants Global “synthetic minor” classification for air emissions because they place a regulatory limit on VOC emissions at 21.9 tons/year, and now have added on the consent decree throughput limits. The synthetic minor classification raises several issues:
 - a. Global’s synthetic minor classification was established prior to when the 2013 permit was granted and when the heated tanks were considered to have no emissions, and the permit did not appear to take these tank VOC emissions into account. The basis for this synthetic minor status is not clear, but it would seem like an evaluation of this synthetic minor status should be completed since the known existing conditions have changed considerably.
 - b. By definition in the Code of Federal Regulations (CFR), granting synthetic minor source classification means that the source does have the potential to emit greater than 50 tons per year, and without DEP-granted synthetic minor source status it would normally be subject to treatment requirements associated with major source classification. Considering the adjacent residential population surrounding Global, it is unclear why this synthetic minor status was granted and is still retained, and the DEP should state explicitly why it is still granted or remove it and declare Global a potential major emitter.
3. On page 8 of the revised draft permit, the DEP states that the Global facility was previously considered in 2013 to have Best Practical Treatment (BPT) by the DEP, but this was before the heated tank emissions were known. The basis for this determination of BPT in 2013, and then the granting of synthetic minor status with a limit of 21.9 tons per year is not presented. Since there was no treatment in 2013, and there is no treatment proposed now, it is unclear how this facility meets BPT status, and it would appear that this evaluation of BPT should be updated to account for the heated tank emissions. Furthermore, in complying with the EPA consent decree, Global has to contain all effluent from the tanks and pass them through the mist eliminator, creating a point source discharge. Adding on treatment to a point source air discharge of VOCs and HAPs should meet the criteria of “practical” treatment since it is a relatively easy add-on at that point. It goes against the intent of state and federal air regulations to have a point source discharge that has the potential to emit at a rate greater than 50 tons/year within a residential area does not have an effluent VOC emissions treatment requirement.
4. On page 13 of the revised draft permit, the DEP states:
 - a. *“Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:*
 - i. *will receive Best Practical Treatment,*
 - ii. *will not violate applicable emission standards, and*
 - iii. *will not violate applicable ambient air quality standards in conjunction with emissions from other sources.”*
 - b. There is no basis for these statements:
 - i. There is no treatment at all now, the evaluation of BPT should be reconsidered since known conditions have changed since the 2013 permit was issued, and adding on treatment to a point-source discharge should easily be considered as BPT.

- ii. The DEP has switched positions on how to estimate emissions from Global's tanks, first denying the validity of Eastmount's methods, and saying AP-42 estimations methods were better. When the actual quantified vapor pressure values determined in 2013 were used in the AP-42 method recommended by the DEP, it showed VOC emissions much higher than the permitted limits; this was previously submitted to the DEP without a response from the DEP. The DEP has now switched back having Global use the emission factors derived from the Eastmount testing since they can be used to show Global is within their permitted limits. But now they also want Global to repeat the testing in a similar, but perhaps in a less rigorous, manner. In short, it appears the DEP is uncertain what Global's emissions are, and that violations of emission standards are entirely possible as shown by a variety of data and estimation methods.
- iii. There is no fence-line air-quality data or air modeling of Global's emissions (and/or others) to demonstrate they do not violate ambient air quality standards in conjunction with other sources. In fact, air quality data from South Portland may be indicating that emissions do end up violating ambient air quality standards. Attached is a preliminary summary of an air model for South Portland using the Human Exposure Model (HEM-3), which was developed by the USEPA to evaluate risk to residential population adjacent to industrial air emissions. The results of this model indicate potential exposure to adjacent populations.

- 5. The combination of points made previously in 2), 3), and 4) on Global's potential to emit, BPT status, and the uncertainty over their emissions, indicate that Global should be required to install treatment on their heated tank vapor collection system suitable to remove at least 90% of effluent VOC emissions from the heated tanks effluent air. If the VOC emissions are as low as Global has claimed recently, activated carbon treatment would be a suitable BPT option. If they are not and carbon is not a suitable treatment option, then other VOC emissions control system should be employed.

Dave Falatko
38 Reynolds Street
South Portland, ME 04106
207-767-7331

From: [Charles Higgins](#)
To: [DEP, Air-Global](#)
Subject: Revision of Global's Air Emissions License
Date: Friday, October 16, 2020 6:08:02 PM

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern,

As a resident of South Portland I am counting on the power you have to make certain that Global installs the best state of the art monitoring and emission capturing system on their oil storage tanks. It is unconscionable that this company can keep polluting our air and threatening the short and long term health of me and the residents of our city. Please force Global to install 24/7 air quality monitoring with full transparency so that residents will know that Global has reduced their emissions and that we can know when we are not being protected.

Please do your job of protecting our environment and not caving in to the evasive tactics of these oil companies.

I support the statement put to you by the City of So. Portland.

Thank you,
Charles Higgins

From: [Abby Huntoon](#)
To: [DEP, Air-Global](#)
Subject: Revised Draft for Global License
Date: Friday, October 16, 2020 2:20:56 PM

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To Whom it may concern,

The neighborhoods are counting on you to do the right thing and make sure that the Revision for Global's permit truly relieves the suffering and anxieties of the residents of So. Portland. It is critical that any new permit ensures that best and most reliable equipment be installed to capture the noxious odors and harmful VOC's and HAP's before they are allowed into our air. I believe adequate third party testing should be done before the equipment is installed. Then after the equipment is put in place testing should be done again to make sure the equipment is working adequately. Testing should then be done twice a year - every 14 months is not enough. Global should have to disclose if any solvents are being added to their product so we can know if there are added dangers from any such additives. All equipment should be checked frequently and maintained according to the Operating and Maintenance protocol required by the manufacturer. As soon as possible there should be 24/7 fence line monitoring with all results made available to the public.

I stand with the recommendations of the City of So. Portland.

It is time for members of the Dep. of Environmental Protection to become our local heroes. Step up and do what we cannot do alone - enforce the clean up of our air because we deserve that.

Thank you,
Abby

Abby Huntoon
abbyhun@gmail.com

From: [Judith Kline](#)
To: [DEP, Air-Global](#)
Subject: License revision application
Date: Friday, October 16, 2020 3:57:19 PM

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I'm writing to support David Falatko's comments regarding Global's license revision application. I have been involved in reviewing the process of resolving Global's EPA violation since it became public information. I have submitted comments to DEP several times as this process has unfolded. I ask that you consider my earlier submittals as testimony on this application but also that my name be added in support of David's comments.

Finally I still object to DEP's refusal to consider this application as anything more than a minor revision given: the apparent acceptance of the Eastmont testing results from 2012-2013; the admission that heated tanks were not and have not until now been considered in Global's license; and the multiple increase in through put that has now been authorized for Global with no corresponding increase in estimated emissions.

Judith Kline, South Portland

From: janepalmer3@verizon.net
To: [DEP, Air-Global](#)
Subject: My Third comment letter on this subject
Date: Friday, October 16, 2020 5:44:00 PM
Attachments: [SoPo tank letter 3.docx](#)

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Dear Maine DEP Members,

This is now my third letter to you regarding Global's Draft Air Emissions License, following up my earlier communications in May and June. I'm writing again to express my deep concern and discouragement at your passivity (to put it bluntly) in the face of the company's ongoing toxic air emissions that endanger the health of everyone living near their tank farms.

While I won't go into much technical detail, as that is being thoroughly identified, analyzed, and described by South Portland's Clean Air Advisory Committee, let me just briefly note three frustratingly preposterous provisions in Global's draft license application:

- A tricky method for calculating emissions that would in fact allow the company to emit far more than the annual limit for a purported "minor emitter;"
- Installation of a "carbon scrubber" to reduce "odorous compounds" that has not been determined to be effective in reducing the toxic VOC's so dangerous to people's health;
- Testing of emissions only every 12-14 months, when we know that the amount of the emissions fluctuates considerably from time to time.

Instead, Global and all the other companies with tank farms here in Maine should be required to have **continuous and accurate** 24/7 monitoring and control of their emissions. Speaking personally, living adjacent to South Portland in Scarborough, I hate to wonder how much of these dangerous VOC's may be present in our air, in the sand of our beautiful beaches, and in the locally caught clams and lobsters we eat.

Every day in which these toxic emissions are allowed to continue is a day when corporate profits are given priority over the health and safety of the people of South Portland and adjacent communities. If you, our Maine DEP, will not act quickly to put a stop to this dangerous air pollution, to whom can we turn for climate safety and justice?

Very sincerely yours,

Jane Palmer

31 Stratton Road in Scarborough

Tel.: 207-883-1139

From: [Priscilla Skerry](#)
To: [DEP, Air-Global](#)
Subject: Citizen Response, Global Draft Lic.
Date: Friday, October 16, 2020 11:01:56 AM
Attachments: [Letter to EPA -Global 10-15-20.pdf](#)

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

The following is respectfully submitted to you
in response to the CD andGlobal's draft license.

Priscilla Skerry, N. D.
Healing Routes
100 Brickhill Avenue, Suite 304
South Portland, Maine 04106
(207) 772-5227 ph
(207) 775-3269
drskerry@myfairpoint.net

From: [Roberta Zuckerman](#)
To: [DEP, Air-Global](#)
Subject: Global Draft License
Date: Friday, October 16, 2020 4:48:13 PM

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To: Maine Department of Environmental Protection
From: Roberta Zuckerman, Resident of South Portland

I am writing in support of the recommendations made by the South Portland Clean Air Advisory Committee on Global's Draft License.

People living and working in South Portland have serious concerns that go far beyond the bad odors from the tanks. Some of the hazardous air pollutants emitted from the tanks have been linked to respiratory problems (including asthma), and can damage the nervous system, liver, kidney, brain and developing fetuses. Children, pregnant women and the elderly are especially vulnerable, as are people with other health complications. On top of that, exposure to air pollution has been linked to increased vulnerability to Covid-19. This is a social justice issue. People living around oil infrastructure have been described as living in "sacrifice zones"! This is not acceptable.

It is positive and encouraging that the Maine DEP is taking steps to require actual testing of the heated tank emissions. The requirement for accountability and transparency on the part of the tank companies needs to go further. Testing every 12-14 months not enough. There needs to be continuous emission monitoring directly from the tanks as well as fenceline monitoring to insure that the CEMS are functioning properly.

Fenceline monitoring with public notification in real time would also enable nearby residents to shelter in place or evacuate if benzene levels were detected at a level that would be considered hazardous.

A requirement for timely mitigation should be included if they are found to be out of compliance through testing.

If there is continued non-compliance their operation should be shut down until they can prove they are capable of functioning in compliance - (similar to restaurants they are in violation of the health code).

The question of why Global continues to be designated as a synthetic minor emitter remains unanswered. The 120 unheated days can be used up in 30 days since each unheated tank is considered as one day - all 4 heated tanks, not being heated on one day counts as 4 days. They don't heat tanks in the winter anyway. Would these non-heated days

be required during their heating season?

At the time Global was designated as a synthetic minor, Global & the DEP maintained that asphalt & #6 heated tanks had negligible emissions and were not counted in Global's emissions reports.

The Eastmount report determined that 2 heated tanks alone had the potential to emit over 50 tons per year which would clearly make them a major emitter. They continued to be considered minor emitters by the DEP.

The "throughput limits" that are claimed to control Global's emissions are several times greater than their previous emissions & no one has explained how this will limit their emissions that were already putting them, when actually measured, into the category of a major emitter.

They are still not being required to have the monitoring or emissions controls that would be required if they were categorized as a major emitter under Title 5. I believe that adequate justification has not been provided for Global's designation as a minor emitter. That designation warrants being reassessed.

To be permitted to carry on a business in our densely populated residential area, Global and the other tank farms should be required by regulations to do it with accountability and transparency to ensure the health of our community. We are looking to our government and regulating agencies to hold them accountable. Their profits should not be at the expense of people's health and well-being.

Thank you,
Roberta Zuckerman
South Portland