
From: Judith Kline <judith.a.kline@gmail.com>
Sent: Monday, April 6, 2020 11:26 AM
To: Reid, Jerry <Jerry.Reid@maine.gov>
Subject: EPA shift in air emissions calculation

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Commissioner Jerry Reid, Department of Environmental Protection

We, Protect South Portland, have become aware of a major shift in the way EPA is calculating tank emissions that has serious consequences for South Portland residents but particularly for the communities surrounding the tank farms. This is a plea that DEP intervene in order to stop a major growth in tank farm business that could substantially increase tank farm emissions and put the health and welfare of the people who live here in jeopardy. On March 14th we sent a packet of information about the handling of the Global license revision application along with 6 questions that we have about the handling of that application. We requested that you clarify any misunderstandings that we may have had in the materials we developed. Now, given the recent changes underway at EPA with regard to the formulas which are supposed to set parameters on the oil business in our City, we have added a 7th question which is much more serious because of its implications not just for Global but for the major potential growth of the oil business in our community. We hope that you'll review this material and respond to the questions we've raised. FYI I've attached the material we sent to you on March 14th.

The situation remains:

1. The EPA found Global to be in violation of the Clean Air Act, and the company repeatedly refused to comply.
2. The Consent Decree, finalized in December, was inadequate to protect the public health.
3. The DEP has the opportunity to do more.

#7. The EPA provides formulas for estimating oil tank emissions based on information provided by the American Petroleum Institute (API). Using these formulas, every 10 years the oil companies determine the level of their authorized estimated annual emissions and that level is part of their license. For Global that level is 21.9T/yr until their license expires in 2023. Annually, using these formulas, the companies report their estimated actual emissions. That estimate for Global recently has averaged 19,700T/yr. However in 2019, the EPA proposed changes to the formulas for estimating emissions that reduces them by about 75%. The amount of emissions hasn't changed, just the numbers. In Global's

license revision application, they didn't address the change in formulas. They did begin using them in their annual reporting of estimated emissions starting in 2018. Their annual emissions for that year were reported at 4.8T/yr., about 25% of the emissions authorized in their license. However they have not proposed a change in their license, using the new formula, to reduce their authorized annual emission level. The concern is that their license revision application does include an increased product throughput of about 500%. It appears that the approval of the license revision application as is, given the new formula for estimating emissions, would essentially authorize an increase in Global's business of 500%. This would result in an equal increase in the amount of harmful emissions to the community.

Is this analysis of the effect of the EPA method of estimating emissions correct? If so, will the DEP require Global to reduce the annual authorized level of emissions by using the new EPA formulas? If their application for minor license revision includes this major change in annual estimated emissions, does the license category still apply?

(March 14th)

HISTORY OF THE GLOBAL COMPLAINT

First we'll go over a bit of history about Global. Then we'll identify some really serious questions that we have about their license proposal.

This fight is all about emissions, or the vapors that come out of oil tanks. They contain volatile organic compounds, including some, like benzene, that are known to be harmful to human health.

These are the central 3 points:

1. The EPA found Global to be in violation of the Clean Air Act, and the company repeatedly refused to comply.
2. The Consent Decree, finalized in December, was inadequate to protect the public health.
3. The DEP has the opportunity to do more.

After several years of investigation, the EPA found Global was in violation of its license, with potential emissions from just two tanks totaling at least 2.5 times more than the company was licensed to emit from the whole facility. They forwarded the case to the Department of Justice. DOJ last year decided to settle the case. However, the Consent Decree was inconsistent and made no provisions to protect the public health. It included no provisions requiring Global to measure or control its emissions. The Decree said it would result in a reduction of 20 Tons of VOCs at the South Portland facility. But it didn't say how or even what the starting point was -- 20T less than what? Instead it stipulated that Global would be permitted to move up to 125 million gallons of product through its facility annually. That's 5X more product than Global typically handles. More throughput equals more emissions. Many of you submitted public comments saying the Consent

Decree would do too little to address the public health concerns of the neighborhoods around Global. Those concerns went unheeded.

The Consent Decree required Global to file for a license amendment. So the ball moved to the State's court. In Maine, the state DEP issues air licenses under the Clean Air Act. Many of us saw this as an opportunity for the State to pick up where EPA left off, to do more. We should note that the DOJ never rescinded its claims that Global is what is considered a "major emitter" and should be subject to more regulation. In fact, the Agency explicitly said in the Consent Decree that it stands by the facts but agreed to settlement because of concerns about the cost of litigation. Some of us hoped that the State DEP would take this as an opportunity to address some of the serious concerns that the residents have raised, including Global's breach of public trust.

But, the DEP instead decided to treat Global's application as a "minor revision" to its license. That's a category of licensing used for minor adjustments that will have no substantial impact on emissions. The rules dictating that kind of license update seem to significantly limit the Agency's ability to require more of Global. Under state statute, a minor revision does not even require public notification or a public meeting. But the DEP has offered to hold one anyway. So as we go into this public meeting, one that has no real statutory authority, we are left considering what the message is. And what we want to see come of it.

One important role is to make sure that our concerns continue to be heard, and to let Global as well as our state and local officials know that more action is needed. In our minds, this is not resolved.

We've distributed a list of detailed questions PSP will submit to the DEP. We can discuss any of those that you have questions about. You're also welcome to use them as a basis for any remarks you'd like to make at the DEP Meeting on March 31st. Questions for DEP Regarding Global's Application Revisions

INTRODUCTION TO QUESTIONS

For the oil industry, the key to protecting the environment is controlling, limiting and treating oil emissions. The licenses that the DEP issues to the oil companies are supposed to define the companies operational parameters and address the conditions of their operation that will set limits on emissions that will protect the air quality. The purpose of Global's current license application filed with the DEP is to incorporate the conditions from the Consent Decree issued by the Department of Justice in March, 2019 .

In the case of the Global application, it seems that both the company and the DEP have selected certain license conditions that increase the potential for emissions that contaminate the air and harm the people and ignored opportunities within the Consent Decree to provide means to control or treat Global's emissions.

#1. The first incidence of this pattern is seen in the choice to address the license application as a “minor revision”, a choice that was supported by the Department. By accepting it as a minor revision, DEP has determined that this license update does not increase emissions at Global's facility, thus no emission calculations are required and there's no need to address emission treatment or control. As can be seen below, there are a handful of factors that demonstrate that this determination is not accurate. **What was the Department's rationale for supporting this application as a minor revision? Is it possible that this is not the appropriate category of license application?**

#2. The Consent Decree says on p.26 that the agreement “will help cleanse the environment, resulting in a VOC reduction of about 20 tons per year at the Global facility.” The Decree on p.29 further requires Defendants “to take specific steps to minimize emissions from the Facility that are harmful to human health and the environment, resulting in less tonnage of VOC emissions per year.” Global's application for Minor Revision states: 1)“facility wide emissions...shall not exceed 21.9 tons per year” - no change; 2) the Equipment (mist eliminators they're installing) are not identified as emission control devices in their application but as “Odor control devices”. **Why doesn't Global's Application include any emission calculations or any provisions for the reduction in VOC emissions?**

#3. The Consent Decree on p.16 set throughput “limits” for Global. That's how much product it's allowed to move through its facility every year. The Decree set those figures for No. 6 fuel oil and asphalt at a total of 125 million gallons per year. Those "limits" would be written into Global's license for the first time. But that figure is 5 times higher than the company's highest annual throughput total, in 2017. **Why would the state allow a license to stipulate that Global is allowed to move so much more product, without requiring the company to account for a potential increase in emissions?**

#4. Global is also requesting to add another new throughput “limit” on distillate products of 150 million gallons per year. This amount is 3 times higher than their annual average for the last 3 years with no indication of the resulting effect on current emissions. **Shouldn't this addition to their license revision be accompanied by an analysis of the effect of this addition on emissions?**

#5. As part of their application, Global is requesting that 4 heated bulk storage tanks be included in the facility wide emission limitations seeming to mean that the calculation of emissions from those tanks had not been part of Global's calculations of their facility wide emissions. This is consistent with a quote from Jane Gilbert in a recent internet article indicating that because of a perceived low volatility of these products, they were not included in the past in the facility wide emission limits of 21.9T/yr.

Two of these tanks are the same ones that Eastmont tested for EPA in 2012-2013 and identified VOC potential emissions of 54.42T/yr. **Shouldn't the facility wide emission limits be increased to reflect the inclusion of these 4 tanks in the calculations?**

#6. All these years there has been no actual air monitoring of the emissions from the oil tanks in South Portland. The oil industry reports its own emissions based on a formulary

table created by the oil industry to calculate their "potential for emissions". When the EPA demanded actual air monitoring testing to be done, back in 2011, the results found Global to be far out of compliance. In submitting the Clear Skies Ordinance in 2014, the Draft Ordinance Committee recommended that fence-line monitoring be required around all the tank farms. In 2016, the EPA collaborated with the City of South Portland to apply for two grants to pay for fence-line monitoring, but they were not successful. We have waited too long. We want the DEP to require 24/7 infrared fence-line monitoring of Global's facility, with continuous real-time reporting of emissions made available to the City and to the public. This would provide the accountability and transparency that the people of South Portland require & deserve from a business that is situated near homes, schools, daycares, senior housing & community centers while emitting known toxic chemicals into our air. **Will the DEP take this crucial step toward protecting public health and restoring trust?**

#7. The EPA provides formulas for estimating oil tank emissions based on information provided by the American Petroleum Institute (API). Using these formulas, every 10 years the oil companies determine the level of their authorized estimated annual emissions and that level is part of their license. For Global that level is 21.9T/yr until their license expires in 2023. Annually, using these formulas, the companies report their estimated actual emissions. That estimate for Global recently has averaged 19,700T/yr. However in 2019, the EPA proposed changes to the formulas for estimating emissions that reduces them by about 75%. The amount of emissions hasn't changed, just the numbers. In Global's license revision application, they didn't address the change in formulas. They did begin using them in their annual reporting of estimated emissions starting in 2018. Their annual emissions for that year were reported at 4.8T/yr., about 25% of the emissions authorized in their license. However they have not proposed a change in their license, using the new formula, to reduce their authorized annual emission level. The concern is that their license revision application does include an increased product throughput of about 500%. It appears that the approval of the license revision application as is, given the new formula for estimating emissions, would essentially authorize an increase in Global's business of 500%. This would result in 5 times the amount of harmful emissions to the community. **Is this analysis of the effect of the EPA method of estimating emissions correct? If so, will the DEP require Global to reduce the annual authorized level of emissions by using the new EPA formulas? If their application for minor license revision includes this major change in annual estimated emissions, does the license category still apply?**

CONCLUSION: Finally, since DEP has regulatory authority over Global's operation, can DEP demonstrate that Global's proposed license revisions will actually reduce Global's emissions as stated in the Consent Decree? Can DEP identify the steps the company is taking that will actually reduce emissions? Can the regulators demonstrate how they are reviewing the application for emissions? The community looks to DEP to protect the air our community is breathing, particularly in the areas of the City that are dominated by oil shipping facilities.

From: [Robin](#)
To: [DEP, Air-Global](#)
Subject: Global Partner's emissions permit - Public comment
Date: Wednesday, April 08, 2020 2:52:42 PM

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To Whom it may concern,

As a resident of South Portland, I would like to submit a public comment on your review of Global Partners' emissions permit. I am strongly urging the DEP to require Global to pay for 24/7 infrared fenceline monitoring with real-time public reporting.

South Portland, and nearby City of Portland are the most densely populated areas in Maine, which means these emissions affect a huge number of citizens.

Please protect our health.

Thank you for your time,
Robin Elliott

From: [Dave Falatko](#)
To: [DEP, Air-Global](#)
Cc: [Millett, Rebecca](#); [Lewis, Kate](#); [Morales, Victoria](#); [Morelli, Scott](#); mpride@southportland.org; [Sabrina Shankman](#)
Subject: Global Companies LLC public comment
Date: Wednesday, April 08, 2020 7:12:38 PM
Attachments: [Global_2018_MAIRIS_Technical_Memorandum_with_comment_3-20-20.pdf](#)
[T-1_4-7-2020.pdf](#)
[Global_South_Portland_Vapor_Pressure_Testing_Asphalt_with_comments_4-7-20.pdf](#)
[Global_South_Portland_Vapor_Pressure_Testing_#6.pdf](#)
[Global_Spring_2019_inspection_report.pdf](#)
[AP-42_350_DF_estimated_Global_SoPo_Air_Emissions_2020.pdf](#)
[AP-42_pages_on_static_tank_losses.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.

This email is a submittal to the Maine DEP as part of the public comment period concerning Global Companies LLC permit renewal application. The information included shows that Global's South Portland terminal is in violation of their existing air permit and that they are a major emitter of volatile organic compounds (VOCs) in excess of 50 tons/year which requires treatment. The information included in this email, in abbreviated form, was first submitted to the Maine DEP on February 21, 2020.

A review of Global Companies LLC South Portland VOC 2018 emission estimate using AP-42 methods indicates Global significantly under estimates and under reports their VOC emissions from their heated asphalt tanks. This occurs because Global has assumed a very low vapor pressure for heated asphalt, and the actual vapor pressure as determined by ASTM method D2879 for their asphalt is 91 times greater than what they use.

In the methods of AP-42, which the Maine DEP, the USEPA, and Global Companies LLC, all agree is the most appropriate and accurate method to estimate emissions, VOC emission estimates are almost directly correlated with vapor pressure. In an analysis of the AP-42 estimation method for Global's heated asphalt tank #9, standard values and the low vapor pressure value assumed by Global were used to obtain the same static yearly VOC emission rate reported for 2018 from the #9 tank, 0.31 tons/year. This result was then adjusted using the actual heated asphalt vapor pressure as determined by ASTM D2879 to obtain a VOC emission rate that is 69 times greater than what Global estimated and reported for the #9 asphalt tank, 21.3 tons/year.

Applying this 69X increase to all of Global's asphalt tanks' static and working VOC emissions results in actual VOC emissions of 53.7 tons per year; this does not include VOC emissions from other products at the facility. This is clearly a violation of their existing permit and makes Global a major source of VOC emissions, requiring treatment. This needs to be addressed and corrected immediately as another season of asphalt heating, handling, and transfer occurs and this cycle of illegal, and un-permitted VOC emissions continues.

The attached documents provide the basis and summary calculations for this analysis, and below is a more detail, step-wise summary of the analysis.

1. In the technical memo on Global's revised estimate for 2018 air emissions at their South Portland terminal (attached), Tom Keefe (Global's Vice President, Environmental, Health and

Safety) describes the issues Global had with the EPA required testing and results used to estimate VOC emissions for asphalt and #6 oil since that testing occurred, the emission estimates are summarized in Table 1 (attached). Global states they are going back to estimating their VOC emissions using the calculations established and documented in AP-42, and notes that the MEDEP agrees with this approach.

2. In Global's calculations, they state that they will use the vapor pressure estimated with calculations (Antoine's Equation) and estimate that #6 oil at 140 degrees F has a vapor pressure of 0.0163 psi. They then state that 300 degree F asphalt has a similar vapor pressure to 140 degree F #6 oil, so they will assume it has the same vapor pressure for both products in their calculations.
3. Using the vapor pressure for #6 oil of 0.0163 psi, Global estimated combined working and static VOC emissions from asphalt for both tanks #3 and #9 at a total of 0.78 tons VOCs/year for year 2018 (highlighted in Table 1).
4. However, Global tested both products previously using ASTM method D 2879 to establish the actual vapor pressure at various temperatures so there was no doubt, the results are attached. ASTM D2879 is the method recommended by AP-42 to find true vapor pressure (page 7.1-23). Bruce Yates, the Global South Portland terminal manager, and Tom Keefe are copied on these test results. These documents were obtained from the EPA's FOIA site.
5. The vapor pressure for their #6 oil at 150 degrees F was 0.033 psi, extrapolating between points indicates the vapor pressure for #6 oil at 140 degrees F is 0.0225 psi.
6. The vapor pressure for Global's asphalt at 350 degrees F was determined to be 1.49 psi, considerably higher, **91 times higher**, than the vapor pressure Global used in their AP-42 calculations for VOC air emissions.
7. The Maine DEP inspector documented in an inspection report from April, 2019 (attached) that the asphalt tanks are heated to nearly 400 degrees F, so selecting a vapor pressure for asphalt at 350 degrees F seems appropriate. Global has always reported that they heat their tanks to 300 degrees.
8. The details on the analysis and comparison of Global's VOC emissions estimate using their assumed vapor pressure and the estimate with Global's actual asphalt vapor pressure is as follows, with the calculations summarized in the attached AP-42 pdf:
 - a. This analysis used the methods in AP-42 to estimate static tank emissions from a tank of 3.36 MG (the size of the #9 asphalt tank at Global), using a vapor pressure of 0.0163 psi (as used/assumed by Global), and adjusted parameters so the resulting output matched the static VOC emissions rate of 0.31 tons/year as declared by Global for the #9 tank for 2018.
 - b. The analysis then used the asphalt vapor pressure determined by ASTM D 2879 at 350 degrees F of 1.49 psi in place of the assumed vapor pressure of 0.0163 psi, and left the

remaining parameters the same, to determine a static VOC emissions rate of 21.3 tons/year for the #9 asphalt tank. This is 69 times greater than the equivalent VOC emissions rate estimated by Global for the #9 tank in 2018 using their lower and assumed vapor pressure of 0.0163 psi.

- c. The analysis then multiplied the VOC emissions estimated by Global for working/transfer of asphalt to/from the #9 tank (0.07 tons/year) by 69 to get an equivalent increased VOC emissions rate for working/transfer of 4.8 tons/year. This higher estimate assumes that working VOC emissions increase by the same amount as static emission if using the higher vapor pressure. This is a valid assumption since the equation for working emissions from AP-42, chapter 5, page 5.2-4, shows that working emissions is directly proportional to vapor pressure.
 - d. The analysis used the same 69X multiplication of static and working emissions for asphalt tank #3 as estimated by Global at 0.21 and 0.19 tons/year, respectively, and multiplied both to get 14.5 and 13.1 tons/year, respectively. This higher estimate assumes that both static and working estimates by Global for asphalt tank #3 increase by the same proportion at 69X, based on the difference in the vapor pressures used and the higher estimate determined for tank #9.
 - e. These estimates of static and working VOC emissions from asphalt for the #3 and #9 tanks total up to 53.7 tons/year, making Global's South Portland facility a major emitter of VOCs, and requiring control treatment for these VOCs.
9. It should be noted that one does not have to do all the calculations to see that increases in vapor pressure have a significant and direct impact on VOC emissions. A review of the AP-42 equations shows that vapor pressure directly affects VOC emissions; these equations are attached.

Dave Falatko
144 Thadeus Street, #6
South Portland, ME 04106
207-767-7331

From: [James LaPlante](#)
To: [DEP, Air-Global](#)
Subject: Public comment on Global Partners emissions permit
Date: Wednesday, April 08, 2020 2:37:13 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.

I would like to submit my public comment to the DEP for the Global Partners emissions permit.

I am a resident and operate a business in South Portland and air quality is very important to me as a both resident and business owner. Both my properties are on Broadway in South Portland and on many occasions we are inundated by the obnoxious odors of the nearby oil tanks. This is both a health risk to me and my family and children, but also a risk to my customers and a detriment to running a business in South Portland.

I believe that companies like Global need to behave like responsible citizens and if they cannot then they should be monitored by the public. That is why i am writing to support the effort to require Global to pay for 24/7 infrared fenceline monitoring with real-time public reporting.

The public needs to know what is going on and the other oil companies and tank owners need to see this as an example of what will happen if they violate the public's trust.

Please send me confirmation of my comments being entered into the record if possible.

Thank you for accepting my comment at this time.

--

James LaPlante

President | Producer - Director | Particle Accelerator Technician

Sputnik Animation | SoPoCoWorks

Tel: 207.780.1471

www.sputnikanimation.com

From: [Patricia Bohner](#)
To: [DEP, Air-Global](#)
Subject: Global Partners emissions and infrared fence
Date: Thursday, April 09, 2020 8:25:48 PM

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Dear DEP,
I have been living in South Portland for 15 years and I love it here. I have a lot of concern about the emissions from the oil tanks. I have compromised lung capacity and work hard to avoid poor air quality.

I hope that you will require Global Partners to pay for a 24/7 infrared fence to monitor the emissions with a real-time public reporting mechanism.

I grew up in an area with poor air quality which is why I have COPD. I don't want to have to move due to the emissions in my town.

Thank you.
Tricia Bohner
34 Angell Ave.
South Portland, ME
207-408-6903

From: [Sarah Lachance](#)
To: [DEP, Air-Global](#)
Subject: please mandate testing around tanks
Date: Thursday, April 09, 2020 5:59:01 PM

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I am writing today to ask for you to put in regulations to protect Maine citizens from the harmful toxins associated with large storage tanks of petroleum

As we know in South Portland, industry is not interested in being a good neighbor after years and years of violating their VOC limit

It is my understanding that Global is up for relicensing
I am calling on the Maine DEP to step up and require Global, as part of it's response to its EPA violation, to pay for installation of 24/7 infrared fenceline monitoring with real-time public reporting. Air monitoring is the only thing that will provide the transparency and accountability we need.

Thank you
Sarah Kasprzak
Portland Maine

--

Sarah Kasprzak
Campaign Earth
(207) 459-0419

Now, more than ever, we need to connect the dots between climate, poverty, energy, food, and water. These issues cannot be addressed in isolation ~ UN Secretary-General Ban Ki-moon

From: [Thomas Kovacevic](#)
To: [DEP, Air-Global](#)
Subject: South Portland air quality
Date: Thursday, April 09, 2020 9:03:33 PM

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People of the DEP,

The federal government is abandoning citizens of this country in favor of its corporate friends. It is therefore incumbent on us, the citizens, to try to protect ourselves since the government is failing us. To that end, we must demand that the operators of tank farms (Global Partners) install 24/7 infrared fenceline air monitoring with real time public reporting. We cannot trust the industry to regulate itself, nor can we trust the government. Therefore we the people insist on our right to live safely in our own country, in our own neighborhoods.

Tom Kovacevic
South Portland

From: [Pam Anderson](#)
To: [DEP, Air-Global](#)
Cc: [Chenette, Justin](#); [Gramlich, Lori](#)
Subject: Tank Farm emissions in So Portland
Date: Friday, April 10, 2020 3:41:23 PM

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Dear Commissioner:

I have been following the issue of the air quality around the Global Tank Farms in South Portland, ME. Several residents whom I know personally, are deeply concerned about the air quality issue. A group I participate in, Elders for Future Generations, has been studying and actively engaging around this air quality issue for over a year.

I personally use the So Portland Community Recreation Center, and get services at an acupuncture clinic, both of which are in the affected area or close by.

The issues identified with the EPA findings are:

1. The EPA found Global to be in violation of the Clean Air Act, and the company repeatedly refused to comply.
2. The Consent Decree, finalized in December, was inadequate to protect the public health.
3. The DEP has the opportunity to do more.

We need our state DEP to protect Maine residents!

Please carefully consider the detailed letter that has been sent to you about this issue, and take urgent action to correct this situation and protect the air quality for the residents of South Portland. They need our attention and immediate action.

Thank you.

Pamela Anderson
1 Wild Dunes Way
Old Orchard Beach, ME

From: [Eileen Dugan](#)
To: [DEP, Air-Global](#)
Subject: Toxic Emissions
Date: Friday, April 10, 2020 8:56:28 PM

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To whom it should concern:

I have lived in South Portland for almost 30 years and consider this my home at age 59. I am disgusted by the smell of the fumes and quite frankly horrified to learn that we may be going backwards as opposed to forward with regard to the clean air act and oversight of the tank farms.

I implore you to please act on the behalf of the good people of South Portland and stand up to Trump and require Global, as part of it's response to its EPA violation, to pay for installation of 24/7 infrared fenceline monitoring with real-time public reporting. Air monitoring is the only thing that will provide the transparency and accountability we need. No more toxic emissions!

Thank you,

Eileen Dugan

[Sent from Yahoo Mail on Android](#)

From: [Robyn Goshorn](#)
To: [DEP, Air-Global](#)
Subject: Air Quality Monitoring in South Portland
Date: Friday, April 10, 2020 7:00:06 AM

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Ladies and Gentlemen:

Air quality is a major determinant of the health of the people who breathe that air. It has been shown that the tank farms in South Portland emit a significant amount of toxins that directly damage the health of South Portland residents.

As a resident of South Portland, I urge you to require that Global Partners pay for continuous infrared fence-line monitoring with real-time public reporting so that we can know the extent of the threat posed to our health by toxic emissions.

Good public policy requires good data and information. Please require the data to be collected so that wise policy decisions can be made to protect the health of all of us in South Portland.

Sincerely,
Robyn Goshorn
5 Carlisle Way
South Portland, ME 04106

From: [Gary Kokx](#)
To: [DEP, Air-Global](#)
Subject: Global Partners license
Date: Friday, April 10, 2020 8:29:23 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.

As long-time South Portland residents, we are very concerned about Global's application to revise their license and their violations of the Clean Air Act. The revision of the “throughput limit” formula will greatly increase the amount of emission from the tanks; increasing the health risks to the local population. In view of the current public health crisis, the importance of clean air is more evident than ever.

We urge you to require Global Partners to pay for 24/7 infrared fenceline monitoring with real-time public reporting in order to gain transparency.

Susan and Gary Kokx

48 Drew Rd

South Portland

From: [Dave & Lisa LaBranche](#)
To: [DEP, Air-Global](#)
Subject: Global Partners application for license revision
Date: Friday, April 10, 2020 10:06:22 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.

As residents of South Portland, we are submitting a public comment about Global Partners' license revision application.

We live within about a mile of Global, and we can smell petroleum fumes periodically, often in the early morning.

Please include provisions requiring Global Partners to install infrared fenceline monitoring and to pay for 24/7, real-time public reporting.

Thank you,
David LaBranche and Lisa Plimpton
28 Hillcrest Ave, South Portland, ME 04106
207-239-0344
davelisasopo@gmail.com

From: [Daniel Lukin-Beck](#)
To: [DEP, Air-Global](#)
Cc: [Shannon Spillane](#)
Subject: South Portland Air Pollution Plea
Date: Friday, April 10, 2020 10:59:01 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:

As homeowners and residents of South Portland, we are appalled at the lack of accountability Global Partners is being held to regarding air pollution and a lack of reporting for our community.

This is disgusting that our community is allowing this to continue right in our backyard.

My wife is copied above and our 2 small children make a household of 4 constituents. For the sake of our health - and most importantly - our children's health, we are asking that the DP require Global Partners to pay for 24/7 infrared fenceline monitoring with real-time public reporting.

During this time of crucial health safety, there is no excuse to allow companies to avoid accountability in their actions in polluting our air.

Please take action asap - thank you for your consideration in the matter,

Daniel Lukin-Beck & Shannon Spillane

--



Daniel Lukin-Beck
865.850.7382
@dlbanter

From: [Nicholas Goldman](#)
To: [DEP, Air-Global](#)
Subject: GLOBAL PARTNERS"
Date: Friday, April 10, 2020 2:21:11 PM

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My name is Nick Goldman. My wife, Valerie, and I live in the Pleasantdale neighborhood of South Portland less than a mile from the Global facility. Since buying our home two years ago, we have been continually worried by the odors coming from the tanks in this neighborhood. Smells of petroleum and liquified asphalt emanate from those tanks during all hours of the day. In summer, with the added humidity, the situation is even worse. We have allowed companies like Global to pollute the air we breath and degrade our quality of life for too long.

We are calling on the Maine DEP to step up and require Global, as part of it's response to its EPA violation, to pay for installation of 24/7 infrared fenceline monitoring with real-time public reporting. Air monitoring is the only thing that will provide the transparency and accountability we need. They should also be required to upgrade their facility with the latest equipment so that residents of South Portland are no longer forced to endure the horrible odors being emitted from those tanks. The technology exists and Global should be forced to adopt it or their lease should be terminated and they should be removed from the state but only after they clean up the mess they have created.

Sincerely,

Nicholas Goldman
68 Chestnut St.
South Portland, Maine 04106

From: [Valerie Goldman](#)
To: [DEP, Air-Global](#)
Subject: Global Partners should be held accountable, please.
Date: Friday, April 10, 2020 2:56:09 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.

Greetings Maine DEP,

Thank you for taking the time and resources to address my concerns as a new home-owner in South Portland. My husband and I moved to Portland in 2017 to be part of the vibrant restaurant community and settle down in a beautiful place. Until the recent COVID-19 situation, I enjoyed serving Mainers and visitors alike as the sous chef at the Honey Paw on Middle St. in Portland. My husband, Nick Goldman, worked as a manager and bar keep at Woodford Food and Beverage on Forest Ave. In July 2018, we bought our very first home at 68 Chestnut St., South Portland. Buying a home of our own and finally getting a family dog has been the greatest joy of our 15 year relationship. We love living in Maine and enjoying its splendor. We love being a part of South Portland. We cherish our Pleasantdale neighborhood off Broadway. However, we do not appreciate our neighbors, Global Partners.

I hate the offensive, chemical smell that fills our neighborhood too often. Daily dog walks become such an unpleasant chore. Forget enjoying the yard or outdoor space. Open spring windows? No thank you. In fact, the very min. it warmed up this year, that awful, awful smell was back. Ugh! I thought to myself, it's back. Or was it always here but difficult to detect in the colder temperatures of winter? What a concerning thought. I really hope those chemicals are not always in the air here. It fills my mind with anxiety to think about how harmful the toxic air is to our health. If only we had know about these emission issues before we bought the house. We would have never chosen this spot, unfortunately. Breaks my heart to think about us now, both without work in a global health crisis, fighting to stay in our beloved home- a home with air that could be hurting us? Can you please, please hold Global Partners accountable for the infrared fenceline monitoring? We need real-time public reporting. We deserve to know what toxic emissions are in the air we breathe. We need monitoring and we need it now!

Thank you very much,

Valerie Goldman

68 Chestnut St.
South Portland, ME
04106
(772)696-5473

From: [Linda Zembsch](#)
To: [DEP, Air-Global](#)
Cc: [david burkey](#); [Protect South Portland](#)
Subject: Global Partners Monitoring
Date: Friday, April 10, 2020 8:27:44 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,

As residents of South Portland, we are very concerned about the air we breathe and that which our community is exposed to. I ask that you require Global Partners to pay for 24/7 infrared fence line monitoring with real-time public reporting. Transparency is needed here. We cannot allow members of the oil industry operating in our fair city to continue to profit at the expense of our health and well being.

Thank you,
Linda Elfriede Zembsch and David Curtiss Burkey
225 High Street
South Portland, Maine 04106

From: [Andrew Fersch](#)
To: [DEP, Air-Global](#)
Subject: Global oil
Date: Sunday, April 12, 2020 8:15:51 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.

Please help keep residents of South Portland (like my family, for instance) safe and require Global, as part of it's response to its EPA violation, to pay for installation of 24/7 infrared fence-line monitoring with real-time public reporting. Air monitoring is the only thing that will provide the transparency and accountability we as a community need.

Please do the right thing and hold Global, and all the oil companies in town, responsible for their impacts on the natural world and the people living in South Portland.

Andrew Fersch // Bonnybriar Road, South Portland

From: timhoney@aol.com
To: [DEP, Air-Global](#)
Cc: jim.schine@gmail.com
Subject: Global Permit
Date: Monday, April 13, 2020 1:31:20 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 DEP Commissioners,

My name is Stephen T. Honey and I am resident of South Portland, Maine. I am urging you to address a very serious issue within our community which involves the permitting of the oil tanks owned by Global.

As a condition for granting this permit we are requesting the Maine DEP require the Global company to pay for the installation of a 24/7 infrared fence monitoring around their property. This is the only way the citizens of South Portland can be assured that Global is adhering to the air pollution standards that it is required to meet. Without this type of public monitoring, Global will continue to pollute the air of our community, and to put hundreds of our citizens at great risk in term of their health.

Maine has a successful track record of protecting our environment. I am proud to live in this state because of the commitment of our elected and appointed officials to protect our environment. Now is the time to put into a place a plan to make sure that companies like Global will not pollute our air, and will be held accountable for any damage they may cause to our precious environment.

Sincerely yours,

Stephen T. Honey

Tim Honey
215 High Street Unit 103
South Portland, Maine
04106
timhoney@aol.com
207-332-8524

From: [Charles Higgins](#)
To: [DEP, Air-Global](#)
Subject: Revision of Global's Permit
Date: Wednesday, April 15, 2020 8:44:27 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.

Attention Maine DEP:

I am a resident of South Portland and have been following the news regarding the fumes from the oil storage tanks in my city. I was very disappointed that the Consent Decree did not directly address the harmful fumes emitted from these tanks or limit future emissions. It appears that by the federal EPA's changes to the formula for determining the throughput, they have actually increased the amount of throughput that Global can legally process. This increase will create further stress on the health of our community by adding to the existing emissions. These oil storage tanks are located around residences for the elderly, our schools and day care centers. These are our most vulnerable residents and should to be protected.

I believe our citizen's deserve to know the amounts of toxic fumes that are being emitted. Please require Global, as part of future compliance and in response to it's past violations, to pay for the installation of [24/7](#) infrared fence line monitoring with real-time public reporting. This is the only means by which we will know what is happening in our community.

Thank you for reading this and please take action,
Charles Higgins

Sent from my iPad

From: [Abby Huntoon](#)
To: [DEP, Air-Global](#)
Subject: Global's Permit Revision
Date: Wednesday, April 15, 2020 11:46:38 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.

Attention Maine Department of Environmental Protection,

It has come to my attention that the federal EPA has changed the formula for how they calculate the emissions coming from oil storage tanks. This change is based on material provided by the oil companies and ends up allowing for far more harmful emissions. In fact, it appears that Global will be able to increase the amount of harmful product that they handle each year by 4.5 times the amount they now handle and they will not be deemed in violation of their permit. It seems obvious that this new formula was not also applied to the number established as the limit in their permit.

The citizens of So.Portland have been suffering health effects and the deprivation of the enjoyment of their property as a result of noxious smells and the legitimate fear that these smells carry very harmful chemicals that are detrimental to our health.

When it was determined that Global had consistently violated the limits of emissions allowed in their permit, the Consent Decree mandated that Global seek a revision of their permit. Conveniently Global has been allowed to implement this new formula so they can emit even more harmful toxins.

Since it is now very difficult to limit the throughput and to have accurate information as to what and how much emissions of harmful toxins are being emitted into our air, the citizens of So. Portland, ask you as the Maine DEP, entrusted to protect the citizens of Maine, to mandate in the revision of Global's permit that they pay to install 24/7 infrared fence line monitoring with real-time public reporting. We deserve to know what we are breathing and when there are bursts of extra noxious materials.

In this time of respiratory viruses, we should have the right to be able to maintain the health of our lungs and you as our government PROTECTION agency should make sure that we are informed and safe.

Thank you,
Abby Huntoon
abbyhun@gmail.com

From: [Kristina MacCormick](#)
To: [DEP, Air-Global](#)
Subject: Air quality in South Portland
Date: Wednesday, April 15, 2020 11:45:58 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.

Dear Jerry Reid, Commissioner of EPA

I fully support the letter sent by Protect South Portland on 4/8/20 to your office.
The unacceptable, poisonous air in South Portland which is emitted by the Global oil tanks must be removed and the oil company must be held accountable. The health of the community is in danger.
I urge you to examine the EPA's method of estimating emission levels and require Global to reduce them significantly.

Sincerely,
Kristina MacCormick
Portland, Maine

From: joe@hemespheredesign.com
To: [DEP, Air-Global](#)
Subject: South Portland Global tanks
Date: Friday, April 17, 2020 9:18:43 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.

Hi Global,

I live on the hill above the Forest City cemetery (on Lincoln Street) in South Portland and have raised a family here for 35 years. We can often smell the off-loading of your oil product when the wind comes from the west.

We are disgusted by Global for breaking the emission rules for so long in South Portland.

We are in favor of your company providing 24/7 infrared fence line monitoring with real time public reporting, being shut down when the emissions are over the limit.

Personally, I think we should tax carbon and emissions at a high level to encourage renewable energy. Please close down the tanks and clean those likely brownfield sites at your cost and let's make them into parks. Thanks,

Joe Hemes
135 Ridgeland Ave
South Portland, Maine 04106

From: [Linden Thigpen](#)
To: [DEP, Air-Global](#)
Subject: So Portland & surrounding area air quality
Date: Saturday, April 18, 2020 11:17:42 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.

Given the Federal government's rollback of environmental regulations it is up to the Federal & State Environmental Protection Agencies to inform communities of levels of air pollution so that communities can protect their citizens accordingly. It is essential that Global be required to pay for and install 24/7 infrared fence-line monitoring with real-time public reporting. We in South Portland cannot protect our citizens without concrete information. Further, it is essential that Industries, be they fossil fuel or any other toxic polluters, be required to inform communities of toxic levels.

It has long been known that air pollution is linked to many health factors and increases the level of susceptibility to disease and diminishes quality of life for many of our citizens, hence increased cost of healthcare and lost worker efficiency. This current Coronavirus is most prevalent in people with health / respiratory issues which are frequently the result of air quality issues at work or in the area they live. Eliminate air quality issues, improve health, you improve worker productivity and workers ability to buy~ buy~ buy which is what keeps America running.

Require 24/7 infrared fence line monitoring for Global & all other So. Portland toxic polluters.

Thank you,

Linden Thigpen

148 Hillside Ave.

So Portland, ME 04106

From: [Anna O'Sullivan](#)
To: [DEP, Air-Global](#)
Subject: Global tank emissions
Date: Monday, April 20, 2020 10:45:20 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.

Hello,

My name is Anna O'Sullivan, and I'm a South Portland resident in very close proximity to the Global tank farm. The toxic emissions have had a huge impact on my health and quality of life since buying my home here 3 years ago. Now I have a one year old son and I'm extremely concerned about the effects they're having on his health.

Please do right by the community here and require Global to install infrared fence line monitors and make the results available to the public in real time.

We all deserve clean air, and right now South Portland does not have it.

Thanks for your time and hard work.

Sincerely,

Anna

From: [Louise Tate](#)
To: [DEP, Air-Global](#)
Subject: Protect South Portland, please
Date: Monday, April 20, 2020 12:15:05 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.

I am a senior citizen with chronic lung disease. I am obviously concerned about air quality. It has been very disturbing to find that while we were fighting tars sands, Global Partners (and others?) were spewing HUGE amounts of pollution into the air, the air I have to breath. And NOW, with coronavirus, their air pollution is even more damaging to my lungs. I personally am now more at risk from a deadly virus because fossil fuel companies are ONLY concerned about profits.

Under this administration the federal government seems to be backing away from virtually all health related regulations. I hope that the State of Maine, through the DEP, will put the health of Maine citizens above corporate greed. I hope and pray that the DEP will require Global Partners to pay for 24/7 infrared fenceline monitoring with real-time public reporting. It is critical for all South Portland residents, especially those of us with lung disease.

Sincerely,
Louise Tate
Deake Street
South Portland

From: [Robert Liscord](#)
To: [DEP, Air-Global](#)
Subject: Global License Amendment Comment Submission
Date: Wednesday, April 22, 2020 8:57:44 AM
Attachments: [4.21 Global License Amendment Application - Liscord Comment.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.

Good Morning,

Please accept the attached comment regarding Global Companies LLC's Application to amend its air emission license. Global's practices are of great concern to me and my community. As my comment expresses, I do hope that DEP can use this license amendment to impose reasonable conditions that will help keep Global's residential neighbors safe.

I would also like to be added to the list of "Interested Parties:

Robert Liscord
robert.liscord@gmail.com
41 Reynolds Street
South Portland, Maine 04106.

Thank you.

Regards, Rob

--

Robert M. Liscord *he/him/his*
41 Reynolds Street
South Portland, ME 04106
603.554.7731
robert.liscord@gmail.com

Robert M. Liscord
41 Reynolds Street,
South Portland, Maine 04106.
603-554-7731 | Robert.liscord@gmail.com

Maine Dept of Environmental Protection
BAQ – Global Project Manager
17 State House Station
Augusta, ME 04333-0017

Re: Global Companies LLC, South Portland Application to Amend Air Emission License

To Whom It May Concern,

Please accept this comment regarding Global Companies LLC (“Global”) application to amend its air emissions license to comply with the federal Environmental Protection Agency’s consent decree entered March 25, 2019. I am gravely concerned with Global’s operations only two blocks from my home – and the poisonous emissions it releases into my community. I hope that Maine Department of Environmental Protection (“DEP”) uses this license amendment to impose conditions that ensure compliance with federal and state law and provide greater transparency regarding Global’s operations for state regulators, municipal leadership and Cumberland county residents. The state is permitted to supplement federal enforcement of the environmental protection laws and regulations. It is crucial that the state do so here.

GLOBAL COMPANIES LLC (GLOBAL) OPERATES IN A RESIDENTIAL NEIGHBORHOOD WARRANTING STRICTER EMISSIONS LIMITATIONS AND OVERSIGHT.

My home is a tenth of a mile from Global’s fence line. I am surrounded by both single-family homes and multi-unit apartment buildings. Closest to Global’s facilities are dozens of families with small children. These kids play together outside every day– taking advantage of the fact that our neighborhood does not include through streets. As you are undoubtedly aware, Global facility is also within a mile of three schools and three daycare facilities. Global operates within this residential rather than a commercial context. Therefore, it is crucial that DEP respond to Global’s application to amend its license in a manner that protects the Maine’s citizens who have made their home in Greater Portland. Maine law permits Maine DEP to impose reasonable conditions on licensees. 38 M.R.S. § 590(2). To protect the community and better oversee Global’s operations, I strongly encourage the DEP to impose the following conditions on Global’s license.

- a. Impose reasonable conditions on emission calculations to ensure consistent and scientifically sound reporting on emissions and publish those conditions.*

In Global's May 2019 Supplemental reporting to the DEP, the company made the assumption that the liquid vapor pressure of asphalt heated to 300°F "is very similar to 140°F No. 6 Oil" and therefore chose to "calculate the asphalt tank standing and working emissions as No. 6 Oil."¹ This assumption results in adopting an estimated vapor pressure for heated asphalt substantially below the documented actual vapor pressure for asphalt heated to 350°F from ASTM D2879.² Shockingly, the actual vapor pressure for heated asphalt is 91 times the vapor pressure assumed by Global in their calculations submitted to the DEP on May 13, 2019.³ If the ASTM D2979 actual vapor pressure for asphalt is used instead, Global would be found to emit VOC's at a rate 69 times greater than they currently report.

The DEP should utilize this license renewal to impose clear requirements on Global's calculation of VOC emissions. Specifically, Global should not be permitted to assume that the vapor pressure of heated asphalt is comparable to No. 6 Oil. Instead, the company should be required to utilize the actual vapor pressure for heated asphalt as documented by ASTM D2879. If the only documented level is 350°F, then they should be required to utilize this actual figure for heated asphalt to calculate the vapor pressure of asphalt heated to 300°F. Under no circumstances should they be permitted to utilize a vapor pressure for a completely different petroleum product. In short, when actual, industry recognized data exists, DEP should mandate that Global utilize this data.

I use the heated asphalt calculation here as an illustration. I recommend that DEP mandate that Global use nationally and internationally recognized conditions on the calculation of vapor pressure for all petroleum products processed and stored by Global that result in the emission of VOC's. These conditions should be documented in the license amendment and publicized in a manner that ensures ease of access for the public. All members of our community should know and understand the standards placed on our petroleum producing neighbor.

b. Mandate that Global Install Perimeter Fencing

Global's own reporting should be supplemented with publicly collected data. To that end, I strongly recommend that Maine DEP require Global to cover the cost for fence perimeter monitoring of VOC emissions as a condition of approving the license amendment. The data from monitors should be directly accessible by DEP and considered alongside the data reported by Global for all future license renewals.

c. Impose conditions that limit future emissions.

¹ Thomas Keefe, *Letter to Maine Department of Environmental Protection* (May 13, 2019), 3.

² See, Dave Falatko, *Email to Maine Department of Environmental Protection for Global Companies LLC public comment* (April 8, 2020).

³ *Id.*

Given Global's assumptions in the calculation of emissions, it is very likely that current emissions exceed the amounts permitted under their current license. Furthermore, the federal consent decree revealed that Global had been exceeding permitted federal and state emission levels at least as far back as 2013. This is over seven years of prolonged exposure for Greater Portland residents to toxic VOC's above levels recognized as safe under the law. Additionally, we have learned since the consent decree was released, that this exposure is based on workplace rather than residence exposure. Therefore, even Global's permissible emissions exceed what makes sense for the residential context in which they operate. Given Global's past transgressions and the residential context in which they operate, Maine DEP should impose conditions on the license amendment reduce VOC emissions through (i) the installation of state of the art VOC capture and control systems; and (ii) the adoption of emission reduction practices.

Any mandated capture and control systems should be sufficient to prevent unsafe levels of VOC exposure for the residents surrounding Global's property. The mist eliminators required in the consent decree remove liquid from the air. They will not address the VOC vapor emissions. Global should be required to install additional equipment that will address the vapor emitted from its operations.

Additionally, mandated emission reduction practices should be more stringent than the EPA consent decree. For example, Global should not be permitted to count each tank that is not heated on a single day as a separate non-heating day. Considering the residential context, a non-heating day for the purposes of Global's DEP license should be defined as a day where all bulk storage tanks are not heated. This is just one example. I request that the DEP also consider imposing additional emission reduction practices to ensure that Global's operations do not continue to unnecessarily harm its neighbors.

d. Impose reasonable conditions that ensure transparency regarding Global's operations.

It was a shock to the Greater Portland Metro area to learn that Global had (a) been emitting VOC's above permissible federal limits; and (b) had been doing so without knowledge of the communities in which it operates. To avoid this problem in the future, I recommend that the license amendment include a requirement that Global copy municipal leadership when submitting reports to DEP and hold quarterly public meetings hosted in conjunction with the city of South Portland and DEP.

First, municipal leadership in all the surrounding communities should be copied on reports submitted by Global to DEP. Specifically, South Portland, Portland, Cape Elizabeth, Scarborough, Westbrook and Falmouth municipal leadership (in any and all reports submitted to federal EPA and Maine DEP. Since airborne VOC's do not stop at municipal boundary lines, it is crucial that all these adjacent and affected communities be included. Reports should be submitted to town and city council members and town managers. If a city, has also designated a clean air advisory committee, as South Portland has done, then that committee should also be copied on the report as well

Second, Global needs to be directly accountable to the South Portland residents impacted the most by its operation. To that end, they should be required to meet with community members on a quarterly basis to discuss their operations and respond to questions and concerns from the community. This has been implemented in Chelsea, Massachusetts, another community where Global operates, with some success. This will ensure that the community is informed about Global's operations. It will also ensure that Global is aware of the concerns from the community about their operations.

e. Impose reasonable conditions that address concerns related emission smell.

The federal consent decree was cause for substantial concern for my family and neighbors. However, it also confirmed our lived reality – that Global's operations result in ongoing, near continuous emissions that impact health and wellbeing of residents. Although I recognize that the most toxic VOC's do not necessarily have an odor, it is also crucial that the license amendment impose conditions requiring Global to address the odors caused by their operations.

Over the five years I have lived in the neighborhood, it is common to wake in the morning to the smell of gasoline or asphalt at least four of seven days. On the best of days, the smell is subtle. But more often it is pervasive – making its way through my home's closed windows. Since Global has submitted its request for a license amendment and Covid-19 has absorbed the State's attention, the smell has gotten worse. Now, it is not uncommon to smell asphalt or gasoline – at least faintly – seven days per week. The smell also lasts longer. On any given day, the smell of asphalt will last all day. Therefore, I request that Maine DEP take additional steps within its authority to impose conditions that will limit the odor released from Global's operations.

CONCLUSION

To conclude, I want to thank Maine DEP for the opportunity to comment on Global's application for a license amendment. The emissions from its operations represent an uncertain and scary reality for me and my neighbors. I do hope that this license amendment can be an opportunity to impose some very reasonable conditions on their operation so that we can continue to enjoy the community we call home.

Please do not hesitate to reach out with any questions. I can be reached at 603-554-7731.

Respectfully Submitted,

Robert Liscord
South Portland Resident

From: shipchannel47
To: [DEP, Air-Global](#)
Subject: Global Partners South Portland Oil Tanks
Date: Friday, April 24, 2020 9:31:17 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.

I am a resident of South Portland. Lately I've come to find out that Global Partners is once again contributing to the pollution of the air around me.

I live near the oil storage tanks that Global owns. They were cited, in the past, by the EPA for their emissions which did not conform to what was laid out in the Clean Air Act. Since then the EPA has allowed global to use a new formula that determines what the emissions are from their tanks. As I understand it, this new formula, made up by the American Petroleum Institute, will allow more pollutants into our air. The owners and operators of the tank farm then report their estimated emissions to the regulators, with no actual testing performed. It's just the formula that they themselves have made up and have now tweaked so that they can allow more missions into the air.

And who, I'm asking, is regulating the monitoring? The owners of these tank farms are reporting their estimated emissions to the regulators themselves. There's no testing going on. So the regulators are regulating themselves?

I think this is all particularly outrageous considering what's going on in the country right now. We certainly don't need any more contributing factors to respiratory ailments. I myself have a compromised immune system. I am susceptible to respiratory illness. I certainly don't need the air in South Portland to be even more polluted.

I live in Maine because I love the outdoors and I consider it to be a healthy environment in which to live. Letting big companies like Global partners get away with polluting my air is not acceptable. Once again it seems as though big money can do whatever they want despite the effect it has on the average American citizen particularly those of us living in South Portland.

To improve the quality of the air, Global needs to install, and pay for, a fence line that monitors, 24 hours a day 7 days a week, the emissions coming from the tanks. And the results need to be made available to us, the public, in real time.

Thank you for considering my concerns,

Molly Aldrich
Ship Channel Road

From: [Lynn Duryea](#)
To: [DEP, Air-Global](#)
Subject: south portland air quality
Date: Friday, April 24, 2020 8:48:28 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 the Maine DEP:

I am a resident of South Portland, very concerned about the health of our citizens and the possibility that we are not getting accurate figures of the amount of toxic emissions from Global's oil storage tanks. I am aware that residents the city who live near the Global oil storage tanks are suffering the adverse health effects of breathing in the toxic fumes emitted from these tanks, especially during bursts at night.

I understand that the emissions are calculated by a formula that uses the amount of product going in to a tank to determine the amount of emissions coming out. I also understand that this formula was recently changed in such a way that it significantly underestimates the fumes now being emitted. Has the permitted volume of emissions been changed by this new formula as well? If not, does this mean that Global will be able to get away with even more emissions in the future?

The only means by which we can know what we are breathing is to have a monitoring system put in place and paid for by Global. The best monitoring would be 24/7 infrared fence line monitoring with results available in actual time to the public.

Please do your part to protect South Portland and mandate that Global install this monitoring system.

Sincerely,
Lynn Duryea
34 Arrowwood Ct., South Portland 04106

From: [Rachel Burger](#)
To: [DEP, Air-Global](#)
Subject: Pollution leads to corona virus increase
Date: Saturday, April 25, 2020 8:06:32 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.

In a time when the world is in an extreme health crisis people are making the connection between air pollution and numbers of corona deaths. It is being discovered that even small increase of air particles can increase death toll by as much as twenty percent. This becomes very relevant for us living in South Portland, the most densely populated city in Maine, carefully following safe distancing while surrounded by 120 polluting oil tanks. The idea of even the slightest increase in an additional throughput from Global or any other company for that matter, becomes most alarming.

It is very troubling that the president has grabbed the opportunity to create more chaos by allowing EPA to stop all restrictions. But surely because of Home Rule the EPA does not have the last word when it comes to Maine. It is incomprehensible that at this time, Global Partners are seeking authorization to quadruple their throughput. With neighbors dying and nursing staff risking their lives to brave this pandemic, surely we can look to our own MaineDEP do all it can to guarantee that air pollutants from the tanks will not be increased and that careful measures will be taken to keep us safe, such as Vapor Reduction Units and fence line monitoring which can stop 95 percent of air contaminants.

Surely this is the time for us all to pull together to keep each other safe.

Rachel Burger
17 Churchill Rd
South Portland
Maine.04106

From: [Rachel Burger](#)
To: [DEP, Air-Global](#)
Subject: Pollution leads to corona virus increase
Date: Saturday, April 25, 2020 8:06:39 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,

In a time when the world is in an extreme health crisis people are making the connection between air pollution and numbers of corona deaths. It is being discovered that even small increase of air particles can increase death toll by as much as twenty percent.

<https://www.theguardian.com/environment/2020/apr/24/coronavirus-detected-particles-air-pollution> This becomes very relevant for us living in South Portland the most densely populated city in Maine, carefully following safe distancing while surrounded by 120 polluting oil tanks. The idea of even the slightest increase in a additional throughput from Global or any other company for that matter, becomes most alarming. It is very troubling that the president has grabbed the opportunity to create more chaos by allowing EPA to stop all restrictions. But surely because of Home Rule the EPA does not have the last word when it comes to Maine. It is incomprehensible that at this time, Global is seeking authorization to quadruple their throughput. With neighbors dying and nursing staff risking their lives to brave this pandemic, surely we can look to our own MaineDEP do all it can to guarantee that air pollutants from the tanks will not be increased and that careful measures will be taken to keep us safe, such as Vapor Reduction Units and fence line monitoring, which can stop 95 percent of air contaminants. Surely this is the time for us all to pull together and keep each other safe.

Rachel Burger
17 Churchill Rd
South Portland
2077670719

From: [Kristina Grimaldi](#)
To: [DEP, Air-Global](#)
Subject: Need for Monitoring Oil Tank Fumes in South Portland
Date: Friday, May 01, 2020 3:46:42 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 Department of Environmental Protection,

As a resident of South Portland's Stanwood Park neighborhood, I am directly impacted by the local tank farm and its emissions, my pregnancy was impacted, and so is my now 8 month old son.

There is absolutely no excuse for a billion dollar company to be emitting levels of pollution higher than what is allowed and what is deemed safe for human exposure, putting lives at risk in the process.

The tank farms in South Portland are surrounded by neighborhoods, schools, and are in close proximity to the metropolis of Portland. Not only is there a significant threat to physical health, but there are economical implications at stake - no one wants to live and work in a community or near communities with excess pollution.

This is Maine - a reputation for clean air and the beauty and sanctity of the natural environment are core facets of what we are known for, what we depend on economically, and a draw for both visitors and transplants who move here.

It is imperative to the health of the local community that Global Partners is held accountable for their past actions and moving forward that they pay for 24/7 infrared fence line monitoring of the farms with real-time public reporting.

Thank you,
Kristina Grimaldi
225 Evans Street, South Portland

--

Kristina Grimaldi
kristina.n.grimaldi@gmail.com
207.749.6804

@mainesurfersunion

From: [Clark Swanson](#)
To: [DEP, Air-Global](#)
Subject: Concerns re Air Global
Date: Friday, May 01, 2020 10:58:36 AM

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As a resident of South Portland, Maine, I am very concerned about the on-going emissions of VOC's from the Global storage tanks in our city. For the protection and well-being of our citizens, I think Global should pay to install a real-time monitoring system at the fence line of the property where they are located so we have knowledge of the level of VOC's being produced.

Thank you for your consideration,
Clark Swanson
203 Mussey Street
South Portland, Maine 04106

From: dylanpoulin@gmail.com
To: [DEP, Air-Global](#)
Subject: FW: Odor Report, (Global South Portland) Monitoring
Date: Monday, May 04, 2020 5:20:47 PM
Importance: Low

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.

Hi there,

Thank you for taking the time to read my email. I would like to please urge Maine DEP to please, please, require Global to pay for 24/7 infrared fenceline monitoring with real time public reporting.

As a South Portland resident it is beyond frustrating and sickening to not even be able to spend the few days we get here in Maine outdoors in my yard or even open my windows without smelling disgusting tar oil fumes.

Thank you,
Dylan Poulin

From: Orion Breen <orion.breen@globalp.com>
Sent: Monday, April 20, 2020 2:16 PM
To: dylanpoulin@gmail.com
Subject: Odor Report

Hi Dylan,

Thank you for reaching out. We are keeping a record of reports, and tracking against our actual operations, so that we can evaluate for any patterns. We have been heating both of our asphalt storage tanks. At what part of Highland Ave. did you smell oil?

We are in the process of adding enhanced odor control technology at our facility. Equipment has been ordered and is already on site, once we receive approval from the city's Planning Board, we will immediately start installation.

Again, thank you for your report and patience as we work to do our part to control odor and determine any patterns. Odors may also be reported to smellmycity.org or to the City of South Portland or the Fire Department. Links are below.

<https://www.southportland.org/departments/code-enforcement/complaints/>

<https://www.southportland.org/departments/fire-department/>

Please don't hesitate to reach out again.

Orion Breen
Public Affairs Liaison

Global Partners LP
800 South Street, Suite 500
Waltham, MA 02454
Cell: 207-992-8234

Date: April 20, 2020 at 7:44:02 AM PDT

Subject: Odor Reporting Form

Name

Dylan Poulin

Location at the time of odor complaint

Highland Ave. South Portland

Time of odor complaint

9:30

Email Address

dylanpoulin@gmail.com

Type of Smell (ex. rotten egg, sewage, gasoline/petroleum, other)

Strong smell of oil in recent days. occurs periodically.

From: [Jesse B](#)
To: [DEP, Air-Global](#); Orion.Breen@globalp.com
Subject: Global - Smells
Date: Thursday, May 07, 2020 5:23:55 PM

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Hello,

In reference to a letter I received today in the mail, I will keep this short and sweet: Get those odor controls for Global established ASAP! I live in South Portland next to one of the containers and the smell is awful on a daily basis. I'm a more recent resident of South Portland but I have lived in the greater Portland area for upwards of 15 years and the stench has been terrible.

Also, I hope the odor controls don't just control the smell but also capture any airborne chemicals that may be infecting us. Carcinogenic chemicals in the air are still present, even if they smell like roses - let's do it the right way the first time and eliminate the odor, and the chemicals, from the air altogether.

Thank you for your time.

Jesse Bickford
Resident, South Portland



Virus-free. www.avast.com

From: [Lyn Maine Greens](#)
To: [DEP, Air-Global](#)
Subject: South Portland Oil
Date: Monday, May 11, 2020 1:44:16 PM

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Hi,

I am from Saco. The smell of the oil tanks was so bad one day, **I thought my car was broken** and spirting oil. Then I found out it is normal for SP. This is not okay. Please require oil companies to function cleanly or be banned.

Thank you,
Linnea Maravell



Virus-free. www.avg.com

From: [Jonathan Hopps](#)
To: [DEP, Air-Global](#)
Subject: Corporate Responsibility
Date: Monday, May 11, 2020 11:55:05 AM

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It has come to my attention your company apparently would not be considered a company that takes responsibility to the people and environment in which you exist. Certainly the South Portland Maine communities are fighting your current practices and potentially future ones in their community.

Under the current license renewal request the town of South Portland has requested EPA to have GP pay for installation of 24/7 infrared fenceline monitoring with real-time public reporting, because air monitoring is the only way to provide the transparency and accountability the community needs. Your track record doesn't indicate you could be capable of save practices. In recent years I know the EPA saw to it to give GP slap on the hand fine, because you couldn't monitor yourself ethically, and now your request to continue polluting the air in conjunction with a President who is in cahoots with the fossil fuel industry is like giving the foxes the key to the hen house.

With so much deregulation by our President the only way to counter the fuzzy math the oil industry uses to get its way. The citizens of South Portland deserve to know what toxic emissions are in the air we breathe. They need monitoring and we need it now!

People and planet before profits.

--

Jonathan Hopps, LCSW, M.Ed.
Therapist
(207) 489-9544
Email: jshoppslcsw@protonmail.com
Website: jonathanhopps.com
Crisis Number 774-HELP

Important, please note:

Never rely on email for urgent or sensitive communications or to cancel appointments. It is important to remember that email is not always timely or dependable and may not be secure. If you do not receive a reply within a day or two, please call me at [207-489-9544](tel:207-489-9544)

The information transmitted in this email is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you received this email in error, please contact the sender and delete the material from any computer. Thank you.

From: [Judith Kline](#)
To: [DEP, Air-Global](#)
Subject: Testimony from Protect South Portland re: license revision application
Date: Monday, May 11, 2020 12:49:26 PM

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PSP's response to:

Bureau of Air Quality

Response to Protect South Portland (PSP) March 14 and April 6, 2020 Comments Submitted to Commissioner Gerald Reid on the Global Companies LLC (Global)

Air Emission License Amendment Application 4/16/2020

General Points of clarification and to correct misunderstandings:

- DEP Pt. 1: The best way to make sure your concerns are heard is to submit comments to the Bureau of Air Quality during the comment periods that are being provided. The official process for submitting comments is to email them to Air-Global.DEP@maine.gov or to mail them to the address listed on the [project's website](#).
- PSP Response: PSP and the community will be filing comments on the DEP website identified. We appreciate the Department's response to the questions we submitted. It helps us to be better prepared for a productive discussion when we are finally able to meet.
- DEP Pt.2: The Department cannot answer questions as to how EPA calculated potential emissions or determined the requirements of the Consent Decree. Only EPA can respond to questions on how or why it undertook the actions that it did. However, the Consent Decree was the means by which EPA and Global legally agreed to settle EPA's claims of alleged violations of the Clean Air Act. With the completion (and fulfillment) of this Consent Decree, EPA considers the alleged violations to be addressed.
- PSP response: EPA didn't calculate potential emissions from Global. They required actual emission testing in 2012 and 2013, done by Eastmont, which determined a potential to emit greater than 50 tons/year of VOCs from just two of Global's heated tanks. EPA took those results seriously enough to file a complaint against Global with the DOJ. EPA never backed off that claim. They negotiated a settlement with the DOJ which was finalized in 2019, 3 years into the term of a political regime which acts publicly to undo environmental controls in this country.
- DEP Pt.3: The Department was not a party to the Consent Decree between EPA and Global, and so did not select any of the conditions contained in it. The Department's role is to process the application to amend the air emission license to incorporate certain conditions contained in the Consent Decree. With that said, we will make our own determination of whether it is necessary to be more stringent on any of the Consent Decree conditions.

- PSP response: The Department's reason for being is to protect the environment of the State. It has the authority under the Clean Air Act to define more stringent oil company requirements than those defined by the EPA. South Portland citizens wait to hear its determination of how to keep the community safe from Global's disregard for our safety.
- DEP Pt. 4: EPA's AP-42 calculation methods for emissions from petroleum storage tanks have been updated as of November 2019. However, the changes to the formulas increase emission estimates for a given scenario compared to the older formulas. The misunderstanding seems to come from the comparison of Global's annual emissions inventory submittal for 2017 compared to the submission for 2018. In 2017, Global based their calculations on emission factors derived from testing data from 2012-2013. In 2018, Global's emissions calculations were based on updated formulas as proposed for the AP42 update, with EPA's and the Department's concurrence.
- PSP response: Global used an assumed vapor pressure for asphalt that is too low and significantly underestimates the actual VOC emissions from their heated asphalt tanks when using the AP-42 method. Will the the community experience the air pollutants identified as 19.5T in 2015, 17.3T in 2016 and 21.5T in 2017 any differently in 2020 if they are reported at 4.8T? Does this "recalculation" which you say represents an increase in emission estimates, have any relationship to the level of health threat to the neighborhood? Does this reduction in reporting of "actual estimated emissions" open the door for Global to increase it's business and still stay within their licensed limit of 21.9 T/yr.? This feels like a numbers game designed to confuse.

The following are the questions raised in PSP's initial communication (March 14), DEP's repl and PSP's response to the replies.

INTRODUCTION TO PSP's QUESTIONS

For the oil industry, the key to protecting the environment is controlling, limiting and treating oil emissions. The licenses that the DEP issues to the oil companies are supposed to define the companies operational parameters and address the conditions of their operation that will set limits on emissions that will protect the air quality. The purpose of Global's current license application filed with the DEP is to incorporate the conditions from the Consent Decree issued by the Department of Justice in March, 2019 .

In the case of the Global application, it seems that both the company and the DEP have selected certain license conditions that increase the potential for emissions that contaminate the air and harm the people and ignored opportunities within the Consent Decree to provide means to control or treat Global's emissions.

PSP's Question #1: The first incidence of this pattern is seen in the choice to address the license application as a "minor revision", a choice that was supported by the Department. By accepting it as a minor revision, DEP has determined that this license update does not increase emissions at Global's facility, thus no emission calculations are required and there's no need to address emission treatment or control. As can be seen below, there are a handful of factors that demonstrate that this determination is not accurate. **What was the Department's rationale for supporting this application as a minor revision? Is it possible that this is not the appropriate category of**

license application?

Maine DEP Response: The Department evaluates the category of a license amendment application according to the categories and definitions in Maine DEP's Chapters 100 and 115. The use of the minor revision category for the pending application is the appropriate category based on these rules for the changes being requested. There is no "modification" or physical change to existing emissions equipment being proposed; therefore, the changes are not considered a "minor modification" or a "major modification" as those classifications are defined in the rule. Installation of control equipment is not considered a physical change of the emission unit and, in fact, Chapter 115 specifically states replacement of control equipment can be addressed through a minor revision.

In response to the public interest in this licensing process, the Department is providing opportunities for public input during this licensing process even though not required by the rule.

PSP's Follow-up question: Don't the following factors demonstrate that the proposed license revision does increase emissions and therefore require that emission treatment or control be addressed: increased throughput for #6 oil and asphalt, increased throughput for distillate products and the initial inclusion of emission estimates for #6 oil and asphalt?

PSP Question #2: The Consent Decree says on p.26 that the agreement "will help cleanse the environment, resulting in a VOC reduction of about 20 tons per year at the Global facility." The Decree on p.29 further requires Defendants "to take specific steps to minimize emissions from the Facility that are harmful to human health and the environment, resulting in less tonnage of VOC emissions per year." Global's application for Minor Revision states: 1) "facility wide emissions...shall not exceed 21.9 tons per year" - no change; 2) the Equipment (mist eliminators they're installing) are not identified as emission control devices in their application but as "Odor control devices". **Why doesn't Global's Application include any emission calculations or any provisions for the reduction in VOC emissions?**

Maine DEP Response: The consent decree did not require Global to provide any emission calculations or to apply for any emission reductions, nor did it specify how the indicated 20 ton/year of actual VOC emission reductions would occur (i.e, EPA did not assign a specific emission reduction to each of its operational conditions). Given this, one must surmise that the VOC reductions indicated in the consent decree will come from some combination of the conditions contained in the consent decree.

PSP's follow-up question: The Consent Decree didn't require Global to provide any emission calculations because they don't review license applications. But shouldn't the DEP be requiring them based on the proposed license changes including those identified in PSP's follow up question to #1 above? If operational changes are proposed that may impact emissions, shouldn't DEP, rather than "surmising" where the VOC reductions will come from, be requiring Global to revise their emission estimates and reset their license limit on emissions?

PSP Question #3: The Consent Decree on p.16 set throughput "limits" for Global. That's how much product it's allowed to move through its facility every year. The Decree set those figures for No. 6 fuel oil and asphalt at a total of 125 million gallons per year. Those "limits" would be written into Global's license for the first time. But that figure is 5 times higher than the company's highest annual throughput total, in 2017. **Why would the state allow a license to stipulate that Global is allowed to move so much more product, without requiring the company to account for a potential increase in emissions?**

Maine DEP Response: A key statement is that those limits would be written into Global's license for the first time. Currently, there are no throughput limits in the license; thus, per EPA's perspective, the throughput is unlimited and therefore the corresponding potential emissions are unlimited. The inclusion of throughput limits and the other limits specified in the consent decree are to ensure that the facility's *potential to emit* does not exceed the major source level of 50 tons/year for VOC. The identified throughput limits are based on *potential to emit* and are not based on the facility's current or past actual throughput levels.

The Department will include in Global's license throughput limits at least as stringent as those mandated by the consent decree but will also make its own determination during the licensing process whether lower throughput or other limits are appropriate for the facility.

PSP's follow up question: Since there's a relationship between throughput and emissions, it makes sense that the more product a company is authorized to process, the higher it's potential to emit. This "so called" limit is 5-6 times the company's historic throughput. But since this "limit" is new, shouldn't the DEP be requiring a corresponding increase in emissions?

PSP Question #4: Global is also requesting to add another new throughput "limit" on distillate products of 150 million gallons per year. This amount is 3 times higher than their annual average for the last 3 years with no indication of the resulting effect on current emissions. **Shouldn't this addition to their license revision be accompanied by an analysis of the effect of this addition on emissions?**

Maine DEP Response: As stated above, the Department will include throughput limits at least as stringent as those mandated by the consent decree but will also make its own determination during the licensing process as to what are appropriate limitations for the facility, including any throughput limits.

PSP follow up question: Same as follow up to #3.

PSP Question #5: As part of their application, Global is requesting that 4 heated bulk storage tanks be included in the facility wide emission limitations seeming to mean that the calculation of emissions from those tanks had not been part of Global's calculations of their facility wide emissions. This is consistent with a quote from Jane Gilbert in a recent internet article indicating that because of a perceived low volatility of these products, they were not included in the past in the facility wide emission limits of 21.9T/yr. Two of these tanks are the same ones that Eastmont tested for EPA in 2012-2013 and identified VOC potential emissions of 54.42T/yr. **Shouldn't the facility wide emission limits be increased to reflect the inclusion of these 4 tanks in the calculations?**

Maine DEP Response: Emissions from asphalt and #6 oil storage tanks have historically been believed to be relatively insignificant, not just in Maine, but nationally. Following the recognition that emissions could be higher than previously estimated, language was added to Global's license in 2013 to clarify that emissions from the asphalt and #6 oil storage tanks were included in the facility's annual license allowed VOC emission limit of 21.9 ton/year.

PSP follow up question: Given the Eastmont test results available in 2012 and 2013 for these products, and since it was nationally recognized that emissions could be higher than expected for these products, did DEP then or has it since considered having their own testing done to verify emission data? Given the renewed controversy over Global's handling of these products and their perceived effect in the community, would DEP consider fence line monitoring of Global's tanks to verify that the community is being protected?

PSP Question #6: All these years there has been no actual air monitoring of the emissions from the oil tanks in South Portland. The oil industry reports its own emissions based on a formulary table created by the oil industry to calculate their "potential for emissions". When the EPA demanded actual air monitoring testing to be done, back in 2011, the results found Global to be far out of compliance. In submitting the Clear Skies Ordinance in 2014, the Draft Ordinance Committee recommended that fence line monitoring be required around all the tank farms. In 2016, the EPA collaborated with the City of South Portland to apply for two grants to pay for fence line monitoring, but they were not successful. We have waited too long. We want the DEP to require 24/7 infrared fence line monitoring of Global's facility, with continuous real-time reporting of emissions made available to the City and to the public. This would provide the accountability and transparency that the people of South Portland require & deserve from a business that is situated near homes, schools, daycares, senior housing & community centers while emitting known toxic chemicals into our air. **Will the DEP take this crucial step toward protecting public health and restoring trust?**

Maine DEP Response: The Department began working with City of South Portland officials in the summer of 2019 to develop and implement a year-long ambient air monitoring study designed to determine actual air pollutant levels throughout the City of South Portland for a host of air toxics, so that this ambient air monitoring data could be used by public health experts at the Maine CDC to make determinations about the quality of the air in the area. This approach represents the first step in our efforts to collect and assess quality-assured air quality data that can be compared with other air toxics data collected throughout the State of Maine as well as data collected throughout the nation.

PSP follow up question: Does DEP have any interest in using the data being developed through this process to assess the impact of emissions from the tank farms and address adequacy of their emission licenses?

PSP Question #7: The EPA provides formulas for estimating oil tank emissions based on information provided by the American Petroleum Institute (API). Using these formulas, every 10 years the oil companies determine the level of their authorized estimated annual emissions and that level is part of their license. For Global that level is 21.9T/yr. until their license expires in 2023. Annually, using these formulas, the companies report their estimated emissions. That estimate for Global recently has averaged 19,700T/yr. However, in 2019, the EPA proposed changes to the formulas for estimating emissions that reduces them by about 75%. The amount of emissions hasn't changed, just the numbers. In Global's license revision application, they didn't address the change in formulas. They did begin using them in their annual reporting of estimated emissions starting in 2018. Their annual emissions for that year were reported at 4.8T/yr., about 25% of the emissions authorized in their license. However, they have not proposed a change in their license, using the new formula, to reduce their authorized annual emission level. The concern is that their license revision application does include an increased product throughput of about 500%. It appears that the approval of the license revision application as is, given the new formula for estimating emissions, would essentially authorize an increase in Global's business of 500%. This would result in an equal increase in the amount of harmful emissions to the community. **Is this analysis of the effect of the EPA method of estimating emissions correct? If so, will the DEP require Global to reduce the annual authorized level of emissions by using the new EPA formulas? If their application for minor license revision includes this major change in annual estimated emissions, does the license category still apply?**

Maine DEP Response: The analysis of the effect of the updates to EPA's calculation methodology is not correct. Using the most current, EPA-approved calculation methodologies

does not require a change to the facility's air emission license and will not impact how the Department determines the annual license allowed emission limits.

PSP follow-up question: If the new EPA calculation methodology reduced Global's actual estimated annual emissions for the terminal to 4.8T/year in 2018, doesn't that effect the limit on what they should allowed to emit annually in their license? If not, why not?

Points of clarification and to correct misunderstandings:

DEP: Oil companies do not determine their authorized annual emissions. Every 10 years they apply to renew their air emission license. The Department determines the levels to be included in the license.

PSP follow-up question: Will the DEP be reducing the terminal wide limit for Global's emissions based on the revised AP-42 chapter 7?

DEP: The comment references "Global recently has averaged 19,700T/yr." We are not able to determine if the commenter means 19.7 ton/year or 19,700 lbs./year. In either case, we are unsure of the where this number came from.

PSP follow-up question: This was the average of Globals reported terminal actual estimated emissions 2015-2017. The number should be 19.7T/yr. A typo.

DEP: The comment appears to claim that the changes to EPA's recent updates to calculation methodologies (contained in AP-42, Chapter 7) changed emission estimates by 75%. This is not correct. The change in reported emissions from 2017 to 2018 was due to changing the emission estimation methodology from using on-site test data (2017) to using updated AP-42 emission estimates (2018). To provide clarity and consistency, the emission calculation methodology Global should use for future emissions reporting will be addressed in the pending license amendment.

PSP follow-up question: It would also be helpful to see the relationship between the License annual limit on emissions and the anticipated results from the future emission calculation methodology.

The submitted application does not include a major change in annual estimated emissions as asserted in this question, so yes, the "minor revision" license amendment category still applies.

From: janepalmer3@verizon.net
To: [DEP, Air-Global](#)
Subject: Monitoring of Global Partners" Tank Farm Air Emissions in South Portland
Date: Monday, May 11, 2020 3:56:52 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 Commissioner Reid and Maine DEP Colleagues,

Friends in South Portland have given me a disturbing update regarding the current status of the toxic tank farm air emissions there. I am writing now to insist that the Maine DEP compel Global Partners, as an essential part of the corporation's response to its violations of the Clean Air Act, to pay for the installation of 24/7 infrared fence-line monitoring with ongoing, real-time public reporting. Although sampling efforts have begun over the past year, because of Global's current application for a license revision, this more thorough monitoring has been urgently requested by the South Portland community.

It is my understanding that the Maine DEP is now considering a license revision application from Global that would exempt the corporation from the stringent requirements for "major emitters," *as calculated by a new mathematical formula from the American Petroleum Institute*. Under the old formula, for example, Global reported emissions for 2017 of 18.65 Tons of VOCs/year. Applying the new formula – HEY PRESTO! – those same emissions for 2017 are just 4.81 T/year. With a license that allows Global to emit as much as 21.9 T/year, this revision would allow for an increase of as much as 500% in annual toxic emissions.

I hope you will agree that this ugly and preposterous sleight of hand – all too typical of environmental policies and practices under the Trump administration – is an outrageous violation of the South Portland community's basic right to a livable environment. Especially now, with the COVID-19 pandemic, toxic tank farm emissions can significantly increase the vulnerability of people who are absorbing these poisons with every breath.

I hope that the Maine DEP will indeed protect the environment in South Portland and nearby communities by requiring Global Partners to fund continuous, accurate monitoring of their tank farm air emissions. This must be done to stop them – quite literally – from getting away with murder. Please be so kind as to send me a response to my letter.

With thanks for your thoughtful consideration,

Sincerely yours,

Jane C. Palmer

31 Stratton Road, Scarborough, ME 04074

Tel.: 207-883-1139 (home), 646-236-6280 (mobile)

From: [Karen D'Andrea](#)
To: [DEP, Air-Global](#)
Subject: Global Partners application
Date: Monday, May 11, 2020 8:42:44 AM
Attachments: [Global Partners license revision.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.

Thank you for the opportunity to provide comment on Global Partners application for license revision. Please find our comments attached.

Karen A D'Andrea
Executive Director, PSR Maine

[Website](#)

[Facebook](#)

[Twitter](#)

207-210-0084

POB 4744

Portland ME 04112



May 11, 2020

Maine Department of Environmental Protection

Re: Global Partners license revision

PO Box 4744
Portland ME 04112

207.210.0084

www.psrmaine.org

Thank you for considering our input with regard to the application review of Global Partners license revision.

Physicians for Social Responsibility Maine Chapter represents over 3,000 health professionals and advocates in Maine working to prevent health threats posed from toxic chemicals, climate change, and nuclear weapons.

Staff

Karen D'Andrea
Executive Director

Residents in South Portland want more protections against the volatile organic compounds (VOCs) that include chemicals such as benzene and naphthalene and acrolein. These VOCs have been associated with a number of health concerns especially for children – exacerbating asthma and other respiratory issues, damaging developing kidneys, liver, brain, and nervous system, and even cancer including leukemia. They all have been known to cause eye, nose, throat, and skin irritation.

Board of Directors

Connie Jordan, MSN, ANP, PMHNP
President

Today, new health studies are beginning to connect some air pollution with COVID-19 deaths. We do not know yet if emissions from South Portland Global Partners can contribute, but we do know that these emissions are harmful to human health.

Sydney Sewall, MD
Treasurer

James Maier, MD
Vice President

Doug Dransfield, MD
Clerk

With a number of schools, daycare centers, and homes near the petroleum storage tanks, parents are concerned. Children are more susceptible to the dangers of these chemicals because their bodies are still developing and because their breathing rates are higher and they can absorb more chemicals per pound of body weight than adults.

Nadine Byers, DO

Paul Liebow, MD

Peter Millard, MD, PhD

Chelsea Robbins, public health,
student rep

We support South Portland residents request for new real-time monitoring and urge the Maine DEP to require Global Partners to install this monitoring equipment to protect the health of families and children.

Peter Wilk, MD

Thank you.

Karen A D'Andrea
Executive Director

From: [Desi Van Til](#)
To: [DEP, Air-Global](#)
Subject: Clean Air
Date: Monday, May 11, 2020 4:04:36 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.

As a Portland resident who lives right across the Fore River from the source of the disturbing toxic smell that emanates from the oil tanks, I am greatly concerned with the deteriorating air quality, and find there are days when I cannot go outside with my young children for fear that the horrible chemical odor is injurious to their health.

There needs to be much more rigorous monitoring and emissions regulation in place if we are going to actually warrant the Vacationland tag of "The Way Life Should Be." Maine's clean air shouldn't be a myth but a verifiable reality. More monitoring is necessary to make that be so.

Thanks state of Maine for collecting and then using hard data to protect your concerned citizens.

Best,
Desi Van Til
19 Thomas Street
Portland, ME 04102

From: [Kara A](#)
To: [DEP, Air-Global](#)
Subject: Global Partners License Update Comment
Date: Tuesday, May 12, 2020 11:19:46 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.

To Whom it May Concern,

My name is Kara Auclair, I live at 4 Latham St, South Portland, ME directly abutting multiple Global Partners Oil Storage Tanks. I am writing today to urge you to require Global Partners to pay for 24/7 infrared fence line monitoring with real-time public reporting. We need transparency & accountability from the oil industry.

Global Partners have not been good neighbors to me and my family. We share the air with these tanks and on especially windy days are made nauseous and experience severe headaches due to the fumes we inhale. My husband has a neurological muscle disorder and has experienced increased headaches since he has been working full time in our apartment due to Covid-19. We are all stuck inside and have noticed more than ever how acute the air quality issues are near our home.

Everyone deserves to enjoy the beauty and benefits of this community, and live and work safely without fear of toxic, unregulated VOC's filling the lungs of pregnant women, sick individuals, elders, and everyone in between. I have been very active in fighting this issue, we collected air samples outside our apartment, and have testified more than five times in favor of increased regulation and expressing concern about Global Partners.

Now it is your turn to do what is right. Please hold Global Partners accountable for the VOCs they emit and require them to monitor their business properly. I implore you to do this for the health and safety of us all.

Be well,
Kara Auclair MSW
4 Latham St. Apt 3
South Portland ME 04106

From: [Anna Dibble](#)
To: [DEP, Air-Global](#)
Subject: South Portland Tank emissions
Date: Thursday, May 14, 2020 1:11:16 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.

Please require Global to pay for 24/7 infrared fence line monitoring with real-time public reporting & Continuous Emissions Monitoring on the tank stacks.

Thank you, in advance.

Anna Dibble (Freeport)

Anna Dibble

802 430 4165

5 Peter Robin Way
Freeport, ME 04032

www.gulfofmaineecoarts.com

GMEA Facebook Page: <https://www.facebook.com/RightWhale207/>

www.annadibble.com

From: [Margaret Brownlee](#)
To: [DEP, Air-Global](#)
Subject: Global Tank Emissions License
Date: Friday, May 15, 2020 4:48:42 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.

Hell Maine DEP,

Thank you for accepting my comments on the Global Tank Emissions License. As a member of the South Portland Community, mom, college student, and young professional. I hope that you hear me out.

This issue of toxic emissions from Global Partners is dangerous to the health of our community. They have caused health issues for young children and older adults with symptoms such as nauseous, headaches, and cough. It is obvious that the smell of diesel oil is a direct result of the tank farms and so I am asking that you require Global to pay for 24 hour fenceline monitoring with real-time public reporting and continuous emissions monitoring on the tank stacks. We need transparency and accountability from the oil industry. Please take action now!

--

Margaret Brownlee
97 Skillings Street
South Portland, ME 04106
(508) 868-7638

From: [Chelsea Conaboy](#)
To: [DEP, Air-Global](#)
Subject: Comment: Global application
Date: Friday, May 15, 2020 11:48:00 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.

Hello -

I am writing as a concerned resident of South Portland. My youngest son was born in 2017 and I spent many summer nights that year awake with him. I started noticing something I had never noticed at our home before: the smell of fuel. It was strongest in the early morning hours, when most of my neighborhood was still asleep. I called the company that services our furnace, twice. They found no issue. I called the fire department and city hall. They brushed off my concerns. I started to recognize that the smell was the same as the one that would hit me many days when I pulled into the parking lot of my sons' daycare, almost adjacent to the Global tank farm. Then I read the news. Global Partners, according to the U.S. Department of Justice, had been in violation of the Clean Air Act for years and the Maine Department of Environmental Protection had sided with the company, essentially blocking action to remedy the problem, while—day after day—toxic emissions encroached on the playground where my sons spent their days and perhaps even the bedroom where they slept.

Now, the Department of Environmental Protection is once again preparing to rubber stamp Global's wishes. Department officials have presented this matter as one in which they have little choice, where the only option is to incorporate the terms of the consent decree, as written, into the company's existing license. I believe they are wrong. The consent decree very explicitly gave the state the power to do more. It reads: "Defendants will submit to ME DEP an appropriate application for an amended state license for the Facility that incorporates terms **at least as stringent** as those referenced above." [emphasis mine]

The company's application does nothing to restore confidence that Global is actually operating within its license, nor does it provide any certainty that the people living in this community are not being harmed by its emissions. I am not questioning the personal integrity or commitment of DEP staff members, but I'm frustrated by the idea that there is nothing the state can do beyond accepting the facts as Global presents them, when the company's track record for accuracy is not good, when the federal court has granted the state authority to do more, and when the local community is begging you to act. Please, act.

There are reasonable steps DEP can take to create accountability and transparency for Global's operations within our community. They include the following:

1) Require Global to resubmit its license application using actual, measured vapor pressure levels in calculating its potential emissions. This entire license update process has been dictated by the idea that Global's emissions remain below those that would trigger "major emitter" status. But, even apart from the broader findings in the federal lawsuit against Global, there is good evidence that those determinations are based on faulty data. According to documents submitted to the DEP by David Falatko, the asphalt vapor pressure Global assumed when calculating emissions is significantly lower than the actual vapor pressure of the asphalt product in those tanks, resulting in dramatically lower potential emissions figures. Require that the same calculations be done with actual vapor pressure measurements. Then proceed with the licensing procedures dictated by state law. If you can't require that, then provide us with a written explanation why not.

2) Impose lower throughput limits. The consent decree stated that the terms it laid out would

reduce annual VOC emissions by 20T while providing no explanation about how. Instead, it included throughput "limits" that are many times higher than the average amount of product the company has moved in recent years. I understand that these limits have never been included in the license before, but as a matter of practice, they represent a dramatic increase in Global's business. More product moved, means more potential emissions and a bigger effect on the community. If the DEP allows any throughput amounts to be incorporate into Global's license, those numbers should be dramatically lower than what's proposed. The federal court gave the state the authority to approve a license more stringent than the consent decree's requirements. This is one obvious area in which the state could, and should, act.

3) Require Global to install 24/7 fenceline monitoring with real-time data reporting to the public. Global has applied for a license revision that could dramatically increase actual throughput levels at its tank farm. At the same time, its most recent reported potential VOC total is about a quarter of its permitted amount, which means that its state license serves as no obstacle to a major ramp up of operations. Again, more product could mean more harmful emissions. And the only accounting of that change and what it means for the local community would be the company's own fuzzy math. South Portland residents already are suffering the effects of exposure. We deserve to know what's in the air that we breath. We deserve accountability and transparency. Continuous fenceline line monitoring would be a meaningful first step.

4) Hold a virtual public meeting so that residents can be heard. The technical challenges of doing so are in no way insurmountable. There are many people who can help orchestrate an online public meeting, including South Portland officials who are successfully hosting them many times per week. The 15-minute presentation posted online was wholly inadequate. It did not address the concerns of this community in any substantial way.

Thank you for reading, and for your consideration,

Chelsea Byun
Margaret St, South Portland

From: [Kim Coit](#)
To: [DEP, Air-Global](#)
Subject: South Portland Clean Air
Date: Friday, May 15, 2020 2:35:43 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: I have lived in SoPo for over 35 years, close to the Coast Guard Station. I have not noticed any odor. However, I do ride my bike from Bug Light to Waynewright regularly and I do notice an odor along the Greenway from the stoplight at Dominoes (at Broadway) all the way back on the greenway, beside the railway tracks and for about 100 yards beyond where the greenway rejoins city streets.

I can't imagine living there; I would be concerned about the health of those who live there. This can't be good for people but I don't know what the science is or whether there have been health studies.

I am in favor of any monitoring both for odor and for health consequences.

Thanks.

Kim

Charles "Kim" Coit

From: [Andrew Fersch](#)
To: [DEP, Air-Global](#)
Subject: Global Comment
Date: Friday, May 15, 2020 12:10:15 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.

Absolutely no one who misleads the public about what they're doing and how it impacts our world and our community should be allowed to be licensed publicly for what they do. Although Global may not emit as much as some of the other companies in town, they lied, and it harmed South Portland residents. It is unacceptable for them to receive a license. Businesses must be held accountable. If we are to continue having a Democracy in which the voice of Americans matters, we must hold business accountable for how they harm Americans.

Andrew Fersch // Bonnybriar Road, South Portland, ME

From: [Lucie Springman](#)
To: [DEP, Air-Global](#)
Subject: South Portland air quality problem continues
Date: Friday, May 15, 2020 8:18:50 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.

Please accept my comments, as a South Portland resident.

I urge you to require Global Partners to accept their responsibility to this city by paying for a 24/7 infrared fence line monitoring with real-time public reporting and Continuous Emissions Monitoring on the tank stacks.

I moved to South Portland 20 years ago and bought a home in this city.

I have never regretted my choice.

This is a great place to live, for those of us not near the oil tanks.

I urge you to make it a great place for all the residents of this city.

We can continue the improvement of quality of life here, in the future, only if those who have profited from using our city, at the expense of air quality for all residents, are held responsible for their actions.

Thank you for your attention and interest in our community.

Lucie Springman

511 Cottage Rd

South Portland, ME 04106

From: [Chelsea Scudder](#)
To: [DEP, Air-Global](#)
Subject: Comment on air emission license application for Global Companies LLC
Date: Saturday, May 16, 2020 8:36:01 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.

Dear Maine DEP,

I am beyond proud to live in a state that deeply values and respects both its human inhabitants and their quality of life, as well as the integrity and beauty of the living world that we are all fortunate to have around us as Mainers.

Here in South Portland, my husband and I take daily walks to Dows Woods or up the Eastern trail to Wainwright fields. We choose to repeat these same walks not only because we are in lockdown and doing our best to stay close to home, but because they are beautiful and have offered us an up-close view of this year's turn to spring.

On these walks, it is not uncommon for us to smell the emissions from the oil tanks nearby. I am pregnant with our first child, due in early September—a fact which has been an anchor of joy for me and my husband throughout these days of the coronavirus. However, the acrid scent of tank emissions often leaves a knot of worry in my stomach, which is then often followed by anger and disappointment that, once again, a big company with big money was allowed to forgo EPA standards for years with practically no consequence—other than the health risks posed to those unfortunate enough to live in their vicinity. This is all too common a story in American environmental history—that money comes first; that the risks to human communities are just uncertain enough to be comfortably brushed aside.

I, of course, understand the importance of a healthy economy for South Portland and for Maine. I understand that, given the pandemic, the health of the economy is looking ever more uncertain and that the choice to issue a license to a large company with deep pockets could seem like an obvious thing to do. What I do not understand, and will never understand—and what I hope that my daughter when she enters this world will *refuse* to understand—is that within the economic system in this country, the health of the economy is repeatedly, relentlessly, put ahead of the health of our communities (both human and non-human).

I urge you not to issue an air emission license to a company that has blatantly forgone oversight and regulation. Maine is well-poised to pursue new and greener forms of energy; South Portland has long been a leader in the state for paving a way forward to make this so. I implore you to continue in *that* precedent, not in the one which turns a blind eye when the dollar signs add up to the right amount.

I close with lines from Rachel Carson's *Silent Spring*:

"We stand now where two roads diverge...the road we have long been traveling is deceptively easy, a smooth superhighway on which we progress with great speed, but at its end lies disaster. The other fork of the road...offers our last chance to to reach a destination that assures the preservation of the earth."

She wrote *Silent Spring* nearly sixty years ago. We still more often than not choose the deceptively easy road. Please take a stand in changing this.

Thank you for your time and consideration,

Chelsea Steinauer-Scudder
72 Bonnybriard Rd, South Portland

From: [Lois Winter](#)
To: [DEP, Air-Global](#)
Subject: Global Partners" emissions permit
Date: Friday, May 15, 2020 6:09:22 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.

I understand that Maine DEP is accepting public comments on your review of Global Partners' emissions permit. When I first moved to Portland in 1994, I temporarily rented a home close to the big oil tanks. When I lived there, I was concerned about the small earthen berms surrounding those giant tanks, wondering how they would perform in case of leaks or terrorist attacks. I was relieved to move out of the immediate vicinity, but now, I recognize the more insidious health threat from air pollution emanating from those tanks. I still live across the Fore River in Portland and expect that air currents move the toxins away from the immediate South Portland neighborhood to a wider region that probably includes my home airshed too. I was recently birding at Hinckley Park in South Portland and smelled the unmistakable chemical odor from those tanks. Regardless of where we live and recreate, no one should have to live with the worry of toxic air from those tanks.

Please use your authority and fulfill your responsibilities to ensure decent air quality for all Mainers by requiring Global to pay for 24/7 infrared fenceline monitoring with real-time public reporting and Continuous Emissions Monitoring on the tank stacks.

Thank you.

Lois Winter
50 Alden Circle
Portland, Maine 04102

From: [Ron Letourneau](#)
To: [DEP, Air-Global](#)
Subject: South Portland Oil Tank Emissions
Date: Monday, May 18, 2020 7:22:06 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:

I'm sure all of you will agree that the health of my children's lungs take precedence over the profit margins of a multi-national corporation. We do agree about this, right? Given this, I want to encourage you to require Global Partners to pay for full-time infrared fence line monitoring and immediate public reporting on it's oil tanks in South Portland. Because of Global Partners previous duplicitous skirting of existing environmental regulations, they must be required to provide the public with continuous emissions monitoring.

Please do what's right here for all of our kids. As they have already proven, Global Partners will not.

Thank you for protecting all of us,
Ron Letourneau
21 Ocean View Rd.
Cape Elizabeth, ME
04107

From: [Nika Beauchamp](#)
To: [DEP, Air-Global](#)
Subject: Comments on Global emissions permit
Date: Thursday, May 21, 2020 2:51:16 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.

DEP on Global air quality

RE: Comments on Global emissions permit

Dear DEP on Global air quality,

As you review Global Partners' emissions permit, I urge you to ensure that South Portland will not face dangerous levels of pollution and hold the company accountable by requiring a monitoring system with public reporting.

South Portland residents deserve to breathe clean air. The health effects of breathing polluted air are profound, ranging from headaches to cancer. These health effects are even more alarming now as research shows that air pollution is linked to higher COVID-19 death rates. It's even clearer that we need to stop this pollution now.

I urge you to look closely at the levels of pollution that will be emitted. I am concerned that the EPA's changes to the way this level is calculated will result in allowing even more air pollution in South Portland, not less. Let's not turn back the clock on our air quality at a time when we desperately need to move forward.

South Portland neighbors only found out that Global Partners had been polluting far above the legal limit years after this violation started. To prevent that disaster from happening again, I urge you to require Global to pay for 24/7 infrared fence-line monitoring with real-time public reporting and continuous emissions monitoring on the tank stacks.

Please ensure that South Portland's air is protected to the highest standard and that residents will have access to transparent, real-time data about pollution levels in the air they breathe.

Sincerely,
Nika Beauchamp
1141 Washington St
Bath, ME 04530
(617) 448-3883

From: [Deborah Capwell](#)
To: [DEP, Air-Global](#)
Subject: Comments on Global emissions permit
Date: Thursday, May 21, 2020 9:40:12 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.

DEP on Global air quality

RE: Comments on Global emissions permit

Dear DEP on Global air quality,

As you review Global Partners' emissions permit, I urge you to ensure that South Portland will not face dangerous levels of pollution and hold the company accountable by requiring a monitoring system with public reporting.

South Portland residents deserve to breathe clean air. The health effects of breathing polluted air are profound, ranging from headaches to cancer. These health effects are even more alarming now as research shows that air pollution is linked to higher COVID-19 death rates. It's even clearer that we need to stop this pollution now.

I urge you to look closely at the levels of pollution that will be emitted. I am concerned that the EPA's changes to the way this level is calculated will result in allowing even more air pollution in South Portland, not less. Let's not turn back the clock on our air quality at a time when we desperately need to move forward.

South Portland neighbors only found out that Global Partners had been polluting far above the legal limit years after this violation started. To prevent that disaster from happening again, I urge you to require Global to pay for 24/7 infrared fence-line monitoring with real-time public reporting and continuous emissions monitoring on the tank stacks.

Please ensure that South Portland's air is protected to the highest standard and that residents will have access to transparent, real-time data about pollution levels in the air they breathe.

Sincerely,
Deborah Capwell
22 WIGHT ST
#C
Belfast, ME 04915
(207) 930-9010

From: [Rae Geren](#)
To: [DEP, Air-Global](#)
Subject: Comments on Global emissions permit
Date: Thursday, May 21, 2020 10:58:06 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.

DEP on Global air quality

RE: Comments on Global emissions permit

Dear DEP on Global air quality,

As you review Global Partners' emissions permit, I urge you to ensure that South Portland will not face dangerous levels of pollution and hold the company accountable by requiring a monitoring system with public reporting.

South Portland residents deserve to breathe clean air. The health effects of breathing polluted air are profound, ranging from headaches to cancer. These health effects are even more alarming now as research shows that air pollution is linked to higher COVID-19 death rates. It's even clearer that we need to stop this pollution now.

I urge you to look closely at the levels of pollution that will be emitted. I am concerned that the EPA's changes to the way this level is calculated will result in allowing even more air pollution in South Portland, not less. Let's not turn back the clock on our air quality at a time when we desperately need to move forward.

South Portland neighbors only found out that Global Partners had been polluting far above the legal limit years after this violation started. To prevent that disaster from happening again, I urge you to require Global to pay for 24/7 infrared fence-line monitoring with real-time public reporting and continuous emissions monitoring on the tank stacks.

Please ensure that South Portland's air is protected to the highest standard and that residents will have access to transparent, real-time data about pollution levels in the air they breathe.

We do not need to relax any more regulations that protect our lives and the live of the earth. Donald Trump has already done enough of that.

Stop those who trade our lives for their profit margins.

Sincerely,
Rae Geren
14 Olde Fort Road
Cape Elizabeth, ME 04107
(207) 799-7934

From: [Jonathan Lynch](#)
To: [DEP, Air-Global](#)
Subject: Comments on Global emissions permit
Date: Thursday, May 21, 2020 6:36:27 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.

DEP on Global air quality

RE: Comments on Global emissions permit

Dear DEP on Global air quality,

As you review Global Partners' emissions permit, I urge you to ensure that South Portland will not face dangerous levels of pollution and hold the company accountable by requiring a monitoring system with public reporting.

South Portland residents deserve to breathe clean air. The health effects of breathing polluted air are profound, ranging from headaches to cancer. These health effects are even more alarming now as research shows that air pollution is linked to higher COVID-19 death rates. It's even clearer that we need to stop this pollution now.

I urge you to look closely at the levels of pollution that will be emitted. I am concerned that the EPA's changes to the way this level is calculated will result in allowing even more air pollution in South Portland, not less. Let's not turn back the clock on our air quality at a time when we desperately need to move forward.

South Portland neighbors only found out that Global Partners had been polluting far above the legal limit years after this violation started. To prevent that disaster from happening again, I urge you to require Global to pay for 24/7 infrared fence-line monitoring with real-time public reporting and continuous emissions monitoring on the tank stacks.

Please ensure that South Portland's air is protected to the highest standard and that residents will have access to transparent, real-time data about pollution levels in the air they breathe.

Sincerely,
Jonathan Lynch
118 Leland St # 2
Portland, ME 04103
(207) 747-5555

From: [Deborah Nicklas](#)
To: [DEP, Air-Global](#)
Subject: Comments on Global emissions permit
Date: Thursday, May 21, 2020 2:07:47 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.

DEP on Global air quality

RE: Comments on Global emissions permit

Dear DEP on Global air quality,

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I urge you to look closely at the levels of pollution that will be emitted. I am concerned that the EPA's changes to the way this level is calculated will result in allowing even more air pollution in South Portland, not less. Let's not turn back the clock on our air quality at a time when we desperately need to move forward.

South Portland neighbors only found out that Global Partners had been polluting far above the legal limit years after this violation started. To prevent that disaster from happening again, I urge you to require Global to pay for 24/7 infrared fence-line monitoring with real-time public reporting and continuous emissions monitoring on the tank stacks.

Please ensure that South Portland's air is protected to the highest standard and that residents will have access to transparent, real-time data about pollution levels in the air they breathe.

Sincerely,
Deborah Nicklas
30 Providence Avenue
Falmouth, ME 04105

From: [Amy Ryan](#)
To: [DEP, Air-Global](#)
Subject: Comments on Global emissions permit
Date: Thursday, May 21, 2020 11:10:02 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.

DEP on Global air quality

RE: Comments on Global emissions permit

Dear DEP on Global air quality,

As you review Global Partners' emissions permit, I urge you to ensure that South Portland will not face dangerous levels of pollution and hold the company accountable by requiring a monitoring system with public reporting.

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South Portland neighbors only found out that Global Partners had been polluting far above the legal limit years after this violation started. To prevent that disaster from happening again, I urge you to require Global to pay for 24/7 infrared fence-line monitoring with real-time public reporting and continuous emissions monitoring on the tank stacks.

Please ensure that South Portland's air is protected to the highest standard and that residents will have access to transparent, real-time data about pollution levels in the air they breathe.

Sincerely,
Amy Ryan
11 Government Street
Kittery, ME 03904
(207) 438-9764

From: [Eva Platt](#)
To: [DEP, Air-Global](#)
Subject: Air Quality Concern
Date: Friday, May 22, 2020 8:51:30 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,

At a time when we are all so profoundly aware of our health, it is extremely important to remember that even in our South Portland yards and homes, we are at risk every day. The air we breathe constantly in our neighborhoods has chemicals that can be damaging to the health of our community. Our beautiful community is housed among oil storage tanks that are actively putting our lives in danger.

We don't know how long this pandemic will last, or what our future will look like: however, it is essential that we are able to maintain our daily health as we combat this virus. It has certainly become clear how much a health threat can impact our lives. What is easy to forget now is that long before COVID-19, our community was still at risk. Children in daycare should not be playing outside and commenting on a horrible smell; we should not have to roll up our windows as we drive down local roads.

It is easy to be lost in our own personal bubble of COVID-19, for it has impacted each of us. However, the ongoing threats still remain and they need to be addressed. We need to be able to understand the risk of the Volatile Organic Compounds (VOC'S) being released by the oil storage tanks and be able to understand the permitted limits and the formulas that are currently being used and what changes are needed for Global to clean up its emissions.

Having Global install a monitoring system to alert the public of what is being released 24/7 would be an important step to keeping the public informed of what needs to be done to improve our air quality.

Many thanks,
Eva Platt
South Portland Resident

From: [Stephanie Scherr](#)
To: [DEP, Air-Global](#)
Subject: Comments on Global emissions permit
Date: Friday, May 22, 2020 7:13:18 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.

DEP on Global air quality

RE: Comments on Global emissions permit

Dear DEP on Global air quality,

As you review Global Partners' emissions permit, I urge you to ensure that South Portland will not face dangerous levels of pollution and hold the company accountable by requiring a monitoring system with public reporting.

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South Portland neighbors only found out that Global Partners had been polluting far above the legal limit years after this violation started. To prevent that disaster from happening again, I urge you to require Global to pay for 24/7 infrared fence-line monitoring with real-time public reporting and continuous emissions monitoring on the tank stacks.

Please ensure that South Portland's air is protected to the highest standard and that residents will have access to transparent, real-time data about pollution levels in the air they breathe.

Sincerely,
Stephanie Scherr
39 Hunter Rd
Freeport, ME 04032
(207) 869-5781

From: [Caitlin Marshall](#)
To: [DEP, Air-Global](#)
Subject: Global Partners needs independent oversight
Date: Saturday, May 23, 2020 9:08:09 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 the respected staff of the Maine Department of Environmental Protection,

When I learned Global Partners has been exceeding legal limits for emissions from their storage tanks in South Portland, I was dismayed. But when I then learned that Global Partners was itself the only one responsible for reporting the level of those emissions, I was not the least bit surprised they'd been breaking that law.

The fumes are not just unpleasant. Air pollution exacerbates asthma. (1, 2) Air pollution causes asthma. (1) My kid has asthma; he doesn't need those fumes, and neither do you or anyone else.

There's also mounting evidence that exposure to air pollution makes covid-19 more deadly, and globally, the correlation between areas of high pollution, and areas of high mortality from covid-19, is undeniable. (3) If your lungs have been stressed for years by toxic chemicals and particulates, they're going to have a harder time battling the virus. And of course, the link between asthma and greater risk of death from covid-19 is also clear. (4)

Global Partners is up for license renewal. By exceeding legal emissions levels for years, they've proven themselves simply unfit to do their own monitoring. I agree with the members of Protect South Portland and countless other residents of South Portland, Portland, and the wider region: renewal of their license must be contingent upon paying for the installation of 24/7 infrared fence-line monitoring with real-time public reporting. With REAL oversight, we might actually get Global Partners to play by the rules and stop dumping their pollution in our community.

Thank you for your consideration of this urgent matter.

Sincerely,
Caitlin Marshall
Portland, ME

(1) <https://www.epa.gov/sciencematters/links-between-air-pollution-and-childhood-asthma>

(2) https://ephtracking.cdc.gov/docs/CDC_Asthma_Final.pdf

(3) <https://www.google.com/amp/s/amp.theguardian.com/environment/2020/apr/20/air-pollution-may-be-key-contributor-to-covid-19-deaths-study>

(4) <https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/asthma.html>

--

Caitlin Marshall
she/her

From: [Fred Brancato](#)
To: [DEP, Air-Global](#)
Subject: Operating permit for Global Companies, LLC
Date: Monday, May 25, 2020 1:08:13 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.

Dear Project Manager:

The Elders for Future Generations (eldersforthefuture.com) are writing to express our concerns about the proposed revisions to the operating permit for Global Companies, LLC.

Our first concern is that MEDEP has never required Global to use true vapor pressure values in calculating emissions according to AP-42 methodology despite the fact that the most recent version of AP-42 references the use of true vapor pressures on pages 23 and 81.

It is our understanding that when the true vapor pressures for #6 fuel oil and asphalt determined in 2013 (as required by EPA Region 1) are used Global exceeds their current permitted emissions and becomes a major emitter.

We are asking that you require the use of true vapor pressures measured yearly. These samples should be taken by MEDEP inspectors during the tank heating season.

Our second concern relates to the proposed addition of an odor control device. The addition of this device provides an opportunity for MEDEP to determine actual VOC emissions according to the schematic modification provided to you by David Falalko, P.E.

The addition of this device would negate the argument over the use of true vapor pressures and provide real time data on emissions. We strongly support this approach and urge you to use your authority to require such modification. We believe this modification would satisfy the mandate of LD 1915 that you devise a way to measure emissions of heated tanks.

Finally, the reason we are so concerned that you do the right thing is the fact that nearby residents are being exposed to potentially harmful petroleum vapors. The Petroleum odor complaints in Portland and South Portland have increased with the advent of the asphalt season and higher ambient temperatures. As elders we are especially vulnerable to these vapors, as are young children and developing fetuses.

You have an opportunity to improve the air quality and protect the health of Portland and South Portland citizens living close to the tank farms. Please act on their behalf.

Sincerely,

Elders for Future Generations
eldersforthefuture.com
Fred Brancato, spokesperson

From: [Sascha Braunig](#)
To: [DEP, Air-Global](#)
Subject: public comment re: Global
Date: Monday, May 25, 2020 10:15:17 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 DEP,

I live in South Portland and I'd like to make a comment regarding the upcoming hearing for Global Partners. The petroleum odors that are sometimes emanating from the Global tank, and possibly others, are overwhelming. I'm lucky to live far enough away that they don't often affect my home directly, but I've personally experienced the odors/emissions as extremely strong in certain areas of South Portland and Portland's West End, to the point that you have to immediately leave the affected area. Some residents don't have this option, as they live in the residential area directly around the tanks. Global Partners must take responsibility for this unacceptable side-effect of their business by agreeing to put humane measuring and remediation technology in place. The DEP must use common sense in setting licensing for Global and other companies that will actually remediate odors now, not sometime in the future. There is no just reason why South Portland residents should be subjected to overpowering fumes with known health consequences in their yards, schools, daycares, parks, and homes. Please imagine this was your own neighborhood.

Sincerely yours,
Sascha Braunig
152 Sawyer St.
South Portland, ME

From: [christopher](#)
To: [DEP, Air-Global](#)
Subject: Global Tank Fumes
Date: Monday, May 25, 2020 11:43:22 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,

As a high school teacher who has lived in the Portland area for at least the past 15 years, I have developed a familiarity with the air quality of the region. Three years ago, I moved from Portland's Rosemont neighborhood to Ferry Village, in South Portland. It has been during this time that my awareness of distinct oil and asphalt fumes has developed. Although my home is located a couple of miles away from the Global tank farms, these fumes are still extremely noticeable at certain times, usually early morning or on days when the humidity and wind currents are right. It is distressing to think that this is something I am experiencing a good distance away from the tank farms and I fully believe the testimony of the community members who are forced to suffer the fumes directly.

I find it absurd and, frankly, obscene that somehow the financial interests of one entity are being privileged over the health and wellness of hundreds, probably thousands of individuals in two separate cities. I think it is appropriate, in light of this observation, to question what exactly is the role of Maine's DEP if not to ensure that its community members are protected. It certainly does not seem that this responsibility to Maine's people is being fulfilled.

Please act accordingly.

Thank you,

Chris Livengood, M.Ed.
152 Sawyer St.
South Portland, ME

From: [Elaine McGillicuddy](#)
To: [DEP, Air-Global](#)
Subject: Urgent Request
Date: Monday, May 25, 2020 9:57:21 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 sir/madam of the Air-Global DEP,

I urge you to support the methodology used by the EPA when it determined that Global is exceeding its permit emission limits because the odor control system proposed by Global has an emission control system.

Moreover, this system can be modified to allow measurement of total emissions, as described by environmental engineer, David Falalko.

I am very concerned about the health and well being of all the people living in the vicinity, and encourage the staff at MEDEP to protect them.

Sincerely,
Elaine G. McGillicuddy

From: [Linda Cohen](#)
To: [DEP, Air-Global](#)
Subject: Global
Date: Tuesday, May 26, 2020 8:23:49 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.

Hi,

I have lived in South Portland for 44 years. I served as City Clerk, City Councilor and Mayor.

I have frequently smelled the heavy odor in the Cash Corner area, especially on overcast days. Someone told me it was just off-gassing from the ships unloading petroleum products. I believed that. And because the air was heavy, the gasses could not easily dissipate. I often defended our petroleum businesses in this way.

I felt so bad when I found out that Global had been violating its emissions license standards for years. Especially as an elected official, I prided myself on my transparency and honesty with the public.

I raised a daughter in this city, one who has asthma. I feel guilty wondering if I should have been more concerned about the petroleum industry and the tanks.

Unlike some, I am not looking to kill this industry or drive it out of South Portland. I believe that will happen naturally over time. I only want these companies to be held accountable and to a high standard that is well monitored. To that end, I am asking that you require state of the art air monitoring equipment at these sites, equipment that can not only be checked by the company but by the state.

South Portland is a beautiful city, and its residents and visitors should be able to enjoy it, odor free.

Thank you for reading my email.

Linda C. Cohen
Former South Portland Mayor

From: [littletree](#)
To: [DEP, Air-Global](#)
Subject: Global Permit Review
Date: Wednesday, May 27, 2020 11:44:47 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.

Attention Members of the DEP/Commissioner,

As a citizen of South Portland, a parent of an elementary school child, and a home care provider in South Portland, I want to express my support and appreciation for every effort the DEP is making to end the dangerous pollution that the people in our community are exposed to.

I am most concerned about my son, the children, not only in my care but the entire community, as well as all the elderly folks. I happen to live nearby the Betsy Ross House and I have several elderly neighbors...we all have to breathe these toxic fumes. The tank emissions have multiple toxic chemicals and we have been shown that the resulting cumulative effect is more damaging than a single chemical exposure.

David Falatko, an expert on environmental engineering, has proposed a new method for emissions testing and control. His proposal identifies how, with two limited modifications, the proposed equipment would be able to directly measure as well as treat the toxic emissions coming out of the heated tanks. The heated tanks are viewed as being responsible for the largest portion of the total oil tank emissions. This seems like a sound solution to me!

Now, more than ever, as we all struggle through this dangerous and uncertain time, we would be very grateful for all your efforts!

Thank you for your time,

Martha

Martha Baldwin
Director/Lead Teacher
Little Tree Preschool
163 Preble Street
South Portland, ME 04106
207.939.1871

From: [Sophia Thurston](#)
To: [DEP, Air-Global](#)
Subject: Global Partners LC
Date: Wednesday, May 27, 2020 5:06:49 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.

As someone living in such a beautiful state as Maine, I am constantly concerned with preserving its environment for countless reasons, both for the sake of all the natural beauty as well as the health of the people who call it home. I think it is extremely important to consider the consequences of allowing Global Partners to do anything less than they can to ensure the air is clean. For instance, it is important to cut down on the VOCs emitted (which in some places have been found to more than double the EPA's guidelines) as well as try to take care of the excess amount of chemicals already in the air. In order to do so, I suggest looking into the proposals of David Falatko. His science-backed and well thought out ideas for equipment that can do just those two things are ready solutions, and I believe them to be great ones. Requiring that these machines or ones like them be put into use would be highly important to every one of the state's residents, especially those who live in South Portland. Particularly, the young children and elderly in the area, who are already facing so much risk to and fear for their health during this current pandemic. All of these factors make it crucial that the DEP makes even more of an effort to protect this environment, which is known, loved, and visited by people all around the world, as well as the local residents. Thank you for taking all of this into consideration.

From: [Doug Bowen](#)
To: [DEP, Air-Global](#)
Subject: Air monitoring of oil storage tanks in South Portland.
Date: Thursday, May 28, 2020 7:21:41 AM
Attachments: [A few years back I canvassed door to door in the Pleasantville neighborhood of South Portland in an effort to block storage and transit of tar sands due to their toxic air emissions.docx](#)

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.

Request That DEP Require Global Partners to Pay For 24/7 Infrared Fence Line Monitoring with Real-Time Public Reporting

My name is Doug Bowen and I am from Porter, Maine, and I am writing on behalf of the Sierra Club Maine Chapter.

A few years back I canvassed door to door in the Pleasantville neighborhood of South Portland during the effort to block transit and off-loading of tar sands due to their toxic air emissions. As I walked along Elm, Chapel, Forest, Palmer and Mechanic streets I experienced a stench so strong I became nauseous. This neighborhood is dense with homes, some less than a hundred yards from groups of large petroleum storage tanks. There, where the stench was worst, I saw children playing on the street.

When I learned later on that these tanks could emit double the amounts of Volatile Organic Compounds allowed by the Environmental Protection Agency, I understood better why I my body reacted so strongly.

Forty years earlier as a laboratory technician, my job had required me to work intermittently with toluene, a VOC that is a chemical precursor of benzene. At that time I had experienced the same nausea and sensation of sickness that I did while walking through this South Portland neighborhood.

It's obvious what I'm getting at. What I was exposed to a few hours a month as a lab tech, these families constantly are. Oil storage and family health just don't mix. Yet that's the reality in this neighborhood, where for years EPA did not report findings of potentially toxic levels of VOC's emitted for many years by Global Partners from large clusters of heated, above ground storage tanks.

I ask that DEP require Global Partners to pay for 24/7 infrared fence-line monitoring with real-time public reporting. Air monitoring is the only thing that will provide the transparency and accountability needed by the residents of South Portland

Thank you very much,

Doug Bowen, Porter, Maine

From: [Pamela Cragin](#)
To: [DEP, Air-Global](#)
Subject: Global Emissions Permit
Date: Thursday, May 28, 2020 2:19:03 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 DEP,

My sister, who like many of us schooled, lived and worked in South Portland, nearby the tank farms. She got cancer at age 39 and passed on at 46. What impact the toxic cancer causing emissions from all of South Portland's tank farms had on her cancer, one can never know. What also can not be known for sure is how these toxic fumes effect Maine hovering in top 10 states per capita cancer rate.

From familiarizing myself with the emissions permits of Global, Portland Pipeline and Gulf in particular, and others, it is utterly shocking what carcinogenic fumes have been allowed into our air. It is further shocking that the petroleum industry, with all they know about their dangerous fumes, they requires the public to fight for the clean air. This pattern of denying all responsibility as neighbors in our community tells all about character.

The petroleum industry in South Portland has not only treated the publicly owned air as a sacrifice zone for profit, but also our very bodies, health and lifespan.

24/7 real time fence line monitoring, the latest technologies to both measure and eliminate toxic fumes at point of emissions, a dramatic reduction in through put, all tools should have been put into place by the industry as soon as they became available throughout these many years, VOLUNTARILY, and with vigor.

But, instead, they used our air and bodies as casualties for profit.

The acceptable amount of toxic fumes which reach our bodies, in the name of petroleum storage industry profit, should be zero. How the industry needs to configures their operations to meet this moral and ethical standard should be their number 1 priority post haste.

It's is beyond time for the DEP to act with strictly the interest of the public who have been, and continue to be damaged by not only Global, but all the petroleum storage toxic fume emitters along South Portland's shore.

Thank you for your continued hard work on this issue. I look forward to a time when all of us can breath safely.

Best,

Pamela Cragin
South Portland

[Sent from Yahoo Mail for iPad](#)

From: [Arthur Linnell](#)
To: [DEP, Air-Global](#)
Subject: Emissions concerns
Date: Thursday, May 28, 2020 8:49:22 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.

I'm concerned about the toxic emissions coming from the Global tanks especially for those living in the immediate area. It seems that emissions will be allowed to increase and that is of even greater concern.

Another concern is the odor control system in that I should like to see measurement of the TOTAL emissions.

Barbara Inman
South Portland

From: [Kristina MacCormick](#)
To: [DEP, Air-Global](#)
Subject: Emissions from Global Companies" tanks in South Portland
Date: Thursday, May 28, 2020 2:27:59 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 Dept. of Environmental Protection,

I am writing on behalf of Elders for Future Generation in regard to the toxic emissions coming from the gas tanks in South Portland. Everyone living in the vicinity has been suffering from the toxic emissions and the oppressive odor for a long time. The owners of the tanks, Global Companies, LLC has reported emissions lower than they actually are, and a recent report from the Company states that they have recalculated the numbers and now believe that they have the right to increase emissions. This is absolutely unacceptable.

The MEDEP needs to support the EPA that has determined that Global is exceeding its acceptable emissions.

Both the odor control system and the toxic emissions system need to be measured and controlled for safety.

Clean air is one of our basic needs. The people of South Portland have suffered enough from the emissions of these tanks, and are asking the MEDEP to step up and protect them.

Sincerely,
Kristina MacCormick

From: [Maron Sorenson](#)
To: [DEP, Air-Global](#)
Subject: South Portland Tank Farm
Date: Thursday, May 28, 2020 8:11:12 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 DEP,

I live in Portland's West End and have recently become very concerned with the odors coming from South Portland's tank farms. As bad as it is here (at times so bad I get a headache in my own house if I leave the windows open), the people of South Portland surely have it 10x worse.

I fail to understand why it's so hard to solve this problem: Global was in violation for *several years*, they need to fix it now.

David Falatko -- a highly respected environmental engineer -- has forwarded a proposal for real-time monitoring and abating of noxious odors and harmful VOC's. You simply must adopt this proposal for Global, and then do your own monitoring of the other companies' emissions. The citizens of South Portland and Portland don't need to wait several more years for simple solutions to corporate pollution that threatens our health.

Sincerely,

Maron Sorenson

From: [Dave Falatko](#)
To: [DEP, Air-Global](#)
Cc: [Morelli, Scott](#)
Subject: Public comment on Global's permit renewal
Date: Friday, May 29, 2020 6:43:45 PM
Attachments: [Proposed Global effluent monitoring schematic 5-29-20.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.

This email is a submittal to the Maine DEP as part of the public comment period concerning Global Companies LLC permit renewal application.

Global Companies LLC South Portland facility (Global) was sued by the United States Environmental Protection Agency (USEPA) and Department of Justice (DOJ) charging that Global was emitting total volatile organic compounds (VOCs) in excess of its permitted limits and had the potential to emit more than 50 tons/year of VOCs, making it a major emitter of VOCs. Despite these charges, which were based on site-specific testing data, there was never any follow-up by the Maine Department of Environmental Protection (MEDEP) to investigate the allegations in this lawsuit, the MEDEP dismissed them entirely and said Global was in compliance with its permit.

Subsequent review of the available data and Global's calculation of their estimated yearly emissions for year 2018 revealed that they used an assumed vapor pressure for asphalt that resulted in them significantly under-reporting their VOC emissions. Completing the same type of calculations as Global did for year 2018 to estimate VOC emissions but with actual vapor pressure values indicated that Global was actually emitting over 50 tons/year from their asphalt tanks making it a major emitter. These calculations were submitted to the MEDEP in a separate email on 4/8/2020.

Again, despite there being at least two lines of evidence that Global has and/or is exceeding its permitted VOC discharge limits, the MEDEP has done nothing to investigate this further. For this reason, ***I strongly feel that the MEDEP should require that Global demonstrate their compliance with the permitted VOC discharge limits through actual collection of data including air sample collection, and temperature, vacuum/pressure, and air flow rates from the tanks.***

The collection of this data can now be completed with relative ease and with limited expense since Global will be installing vapor collection piping, mist eliminator and collection blower as required under the consent decree agreed to between Global and the USEPA/DOJ. In addition, if Global is discharging an excess of VOCs or hazardous air pollutants (HAPs), they can easily add on treatment in the form of activated carbon units to remove VOCs. The collection of this data can be completed as shown on the attached schematic, which was taken from Global's permit renewal application with text added to show/call-out the simple additions that would allow this. These additions are discussed in the sections below:

1. Sample ports, along with temperature, vacuum/pressure, and flow sensors can be added to the ductwork to be installed, all of this instrumentation can be obtained: <https://www.dwyer-inst.com/Products/>
2. Air samples can be collected/analyzed for HAPs, air phase hydrocarbons (APH) and polycyclic aromatic hydrocarbons (PAH) by: <https://alphalab.com/index.php/analytical-services/air-testing/air-testing-capabilities>
3. An on-line continuous hydrocarbon/VOC analyzer can monitor VOC emissions continuously with
 - a. : <https://www.ametekmocon.com/products/hydrocarbonanalyzers/9000totalhydrocarbonanalyzer>
 - b. Or with: <https://www.mpowerinc.com/gas-transmitters/>
4. Activated carbon can also be easily added for VOC emission control treatment as needed:

<https://www.evoqua.com/en/brands/IPS/Pages/VOCarb-410.aspx>

5. A programmable logic controller (PLC) can be used to integrate operations and data collection/reporting such as: <https://unitronicsplc.com/>
6. Continuous on-line reporting/monitoring can be done with a wireless system such as:
https://www.automationdirect.com/adc/shopping/catalog/communications/secure_remote_access_-_vpn/stridelinx_vpn_routers/4g_lte/se-sl3011-4g

The proposed Global system additions allow for the relatively easy and cost-effective add-on of monitoring equipment, along with the potential for vapor control treatment at the end of pipe discharge, as shown on the attached schematic. This would seek to resolve the question of what exactly is Global emitting, and how much is it emitting, and would help to restore the public's faith in the regulatory process and the MEDEP.

Sincerely,

Dave Falatko
38 Reynolds Street
South Portland, ME 04106

From: [Brian](#)
To: [DEP, Air-Global](#)
Subject: Tank fumes comment
Date: Saturday, May 30, 2020 7:12:14 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,

I live in the Ferry Village neighborhood of South Portland, and although my home is located a couple of miles away from the Global tank farms, I can smell distinct oil and asphalt fumes which are still extremely noticeable at certain times, usually in the early morning or on days when the humidity and wind currents are right. It is distressing to think that this is something I am experiencing a good distance away from the tank farms and I fully believe the testimony of the community members who are forced to suffer the fumes directly.

I find it absurd and, frankly, obscene that somehow the financial interests of one entity are being privileged over the health and wellness of hundreds, probably thousands of individuals in two separate cities. I think it is appropriate, in light of this observation, to question what exactly is the role of Maine's DEP if not to ensure that its community members are protected. It certainly does not seem that this responsibility to Maine's people is being fulfilled.

Please act accordingly.

Thank you,

Brian Musselwhite

From: [Judith Southworth](#)
To: [DEP, Air-Global](#)
Cc: richbarrali@me.com
Subject: letter of concern - please reply
Date: Saturday, May 30, 2020 5:37:41 PM
Attachments: [MEDEP letter.docx](#)

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.

Attached please find a letter of concern regarding potentially harmful emissions and a request for your attention.

Thank you for reviewing my letter. A reply will be appreciated.

Sincerely,

Judith Southworth

50 Western Promenade

Portland, Maine

From: [Mina Wade](#)
To: [DEP, Air-Global](#)
Subject: Comment: Global application
Date: Sunday, May 31, 2020 9:06:57 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.

Hello DEP-

I am a resident in South Portland who chose this area because I thought it was a safe, and family friendly environment to raise my kids. Our local elementary school's bike racks are often overflowing with bikes and scooters from morning walks to school.

When I learned of the emissions that were allowed by Global, and the ongoing air quality impacts they are having, I grew very concerned for both my family and the families that live and play in the surrounding community.

I went to the city council meetings with the DEP and the ME CDC and heard concerned families talk about their children who have developed asthma with no family history. I smell the disgusting smells that I have learned are associated with fuel offloading and refinement.

How could the DEP be so tone deaf as to once again give in to Global's requests? Who do you hold as more important? Your citizens who have come here to raise kids? OR a business who was found to not be following regulations already?? Please protect us, our families your tax paying citizens!

There are reasonable steps DEP can take to create accountability and transparency for Global's operations within our community. They include the following:

1) Require Global to resubmit its license application using actual, measured vapor pressure levels in calculating its potential emissions. This entire license update process has been dictated by the idea that Global's emissions remain below those that would trigger "major emitter" status. But, even apart from the broader findings in the federal lawsuit against Global, there is good evidence that those determinations are based on faulty data. According to documents submitted to the DEP by David Falatko, the asphalt vapor pressure Global assumed when calculating emissions is significantly lower than the actual vapor pressure of the asphalt product in those tanks, resulting in dramatically lower potential emissions figures. Require that the same calculations be done with actual vapor pressure measurements. Then proceed with the licensing procedures dictated by state law. If you can't require that, then provide us with a written explanation why not.

2) Impose lower throughput limits. The consent decree stated that the terms it laid out would reduce annual VOC emissions by 20T while providing no explanation about how. Instead, it included throughput "limits" that are many times higher than the average amount of product the company has moved in recent years. I understand that these limits have never been included in the license before, but as a matter of practice, they represent a dramatic increase in Global's business. More product moved, means more potential emissions and a bigger effect on the community. If the DEP allows any throughput amounts to be incorporate into Global's license, those numbers should be dramatically lower than what's proposed. The federal court gave the state the authority to approve a license more stringent than the consent decree's requirements. This is one obvious area in which the state could, and should, act.

3) Require Global to install 24/7 fence line monitoring with real-time data reporting to the public. Global has applied for a license revision that could dramatically increase actual throughput levels at its tank farm. At the same time, its most recent reported potential VOC total is about a quarter of its permitted amount, which means that its state license serves as no obstacle to a major ramp up of operations. Again, more product could mean more harmful emissions. And the only accounting of that change and what it means for the local community would be the company's own fuzzy math. South Portland residents already are suffering the effects of exposure. We deserve to know what's in the air that we breathe. We deserve accountability and transparency. Continuous fence line monitoring would be a meaningful first step.

4) Hold a virtual public meeting so that residents can be heard. The technical challenges of doing so are in no way insurmountable. There are many people who can help orchestrate an online public meeting, including South Portland officials who are successfully hosting them many times per week. The 15-minute presentation posted online was wholly inadequate. It did not address the concerns of this community in any substantial way.

Please take action. There are a lot of families and more importantly a lot of kids who are depending on you for their safety.

Thank you for considering,

Serena Wade,
Pillsbury St, South Portland

From: [Megan Roy](#)
To: [DEP, Air-Global](#)
Subject: Air quality in south portland
Date: Monday, June 01, 2020 4:38:02 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.

Protect South Portland has been supporting fenceline monitoring as a means of providing transparency for the public to know what is in the air we're breathing and to provide accountability. A new proposal has been submitted to the CAAC and to the DEP by David Falatko, an environmental engineer, that is a feasible and highly effective means to identify & measure the true emissions directly from the heated tanks. If needed, it also provides a way to mitigate or eliminate the toxic emissions coming out of the tanks. The Global application currently includes the installation of equipment referred to as a mist eliminator to "mitigate odors", a dry scrubber, and an exhaust fan. David Falatko's proposal identifies how, with two limited modifications, the proposed equipment would be able to directly measure as well as treat the toxic emissions coming out of the heated tanks. The heated tanks are viewed as being responsible for the largest portion the total oil tank emissions. The reason we are so concerned is the fact that nearby residents are being exposed to potentially harmful petroleum vapors. The petroleum odor complaints in Portland and South Portland have increased with the advent of the asphalt season and higher ambient temperatures. Young children, developing fetuses, and elders are especially vulnerable to these vapors. In this time of pandemic, it is especially important that our immune systems not be compromised by breathing toxic emissions. This is an opportunity to improve the air quality and protect the health of the many people living, working & going to school close to the tank farms. As the agency entrusted with protecting our environment and it's citizens, we ask the DEP to please act decisively to protect our health.

.....



Art Direction & Design
www.meganroy.com

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From: [Linden Thigpen](#)
To: [DEP, Air-Global](#)
Subject: Global license revision application
Date: Monday, June 01, 2020 3:47:38 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.

As the world fights to live against Covid 19, struggling to breathe, it is time to address air pollution on every level. In Maine, the oil tanks in South Portland are responsible for nearly 50% of the Hazardous Air Pollutants in our air, we expect you, the Department of Environmental Protection, to oblige the companies to take effective measures to contain emissions, once and for all. Each & everyone one of you making these decisions is a potential victim of air pollution so if not for our health do the right thing for your children & grandchildren.

I have heard recently that David Falatko, an environmental engineer, is proposing that certain equipment for monitoring and capturing toxic emissions can be added to the system that Global has submitted in their application. This seems like the very best means to improve the air quality in South Portland. As we continue to struggle through this dangerous time it is exactly the time to correct previous errors & omissions in regulations for the health & safety of workers & residents in any area these national & international companies operate.

Thank you for reviewing my comments & I look forward to expanded positive action on the part of your agency.

I remain,
Linden Thigpen
148 Hillside Ave
So. Portland, ME 04106

From: [Diane Brakeley](#)
To: [DEP, Air-Global](#)
Subject: South Portland oil tanks
Date: Tuesday, June 02, 2020 8:44:54 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.

Dear DEP,

I am a concerned citizen from Cape Elizabeth. Every day Mainers are fighting for their lives against Covid 19, struggling to breathe. Because the oil tanks in South Portland are responsible for nearly 50% of the Hazardous Air Pollutants in our air, we beg you, the Department of Environmental Protection, to oblige the companies to take effective measures to contain emissions, once and for all.

Through obtaining information from knowledgeable people, most of us thought that a 24/7 infrared monitoring system at the edge of Global's property was the best means of informing the public of what they are breathing. I have heard recently that David Falatko, an environmental engineer, is proposing that certain equipment for monitoring and capturing toxic emissions can be added to the system that Global has submitted in their application. This seems like the very best means to improve the air quality in South Portland. As we continue to struggle through this dangerous time we would be most grateful for all your efforts.

Please help us protect ourselves and our planet. Thank you.

Diane Brakeley
37 Steongate Road
Cape Elizabeth, ME

From: [Hannah Sise](#)
To: [DEP, Air-Global](#)
Subject: clean air for South Portland
Date: Tuesday, June 02, 2020 8:14:36 AM

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Protect South Portland has been supporting fenceline monitoring as a means of providing transparency for the public to know what is in the air we're breathing and to provide accountability. A new proposal has been submitted to the CAAC and to the DEP by David Falatko, an environmental engineer, that is a feasible and highly effective means to identify & measure the true emissions directly from the heated tanks. If needed, it also provides a way to mitigate or eliminate the toxic emissions coming out of the tanks. The Global application currently includes the installation of equipment referred to as a mist eliminator to "mitigate odors", a dry scrubber, and an exhaust fan. David Falatko's proposal identifies how, with two limited modifications, the proposed equipment would be able to directly measure as well as treat the toxic emissions coming out of the heated tanks. The heated tanks are viewed as being responsible for the largest portion the total oil tank emissions. The reason we are so concerned is the fact that nearby residents are being exposed to potentially harmful petroleum vapors. The petroleum odor complaints in Portland and South Portland have increased with the advent of the asphalt season and higher ambient temperatures. Young children, developing fetuses, and elders are especially vulnerable to these vapors. In this time of pandemic, it is especially important that our immune systems not be compromised by breathing toxic emissions. This is an opportunity to improve the air quality and protect the health of the many people living, working & going to school close to the tank farms. As the agency entrusted with protecting our environment and it's citizens, we ask the DEP to please act decisively to protect our health.

Thank you,
Hannah Sise

From: [Jill Callahan](#)
To: [DEP, Air-Global](#)
Subject: SHOCK
Date: Wednesday, June 03, 2020 12:56:09 PM

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In the early 1980's I moved to SPLD. I developed AFIB, a very common heart condition. Now age 84, I am at end stage and can only walk 25 feet without sitting down to catch my breath. During that era I kept hearing that industries in Ohio were forced to raise their chimney to vent the smog higher into the jet stream. They did not want to spend the money and the result was acid rain falling on Maine and the Canadian Maritimes

Now I am SHOCKED to hear that my late in life condition may have happened near my home. It is legal for ALL tanks to vent over 200 partials of toxic waste every day. We are surrounded from bug light to the end of the waterfront.

When the first tanks were built, the people involved did not have SPLD residents best interests in the license issues.

Barbara Callahan
18 Ocean St. SPLD
767-0708

From: [Melinda Hull](#)
To: [DEP, Air-Global](#)
Subject: COMMENT - Global Partners license revision application
Date: Tuesday, June 02, 2020 7:34:56 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.

My name is Melinda Hull and I live at 44 Kaler Road in South Portland.

In 2015, I came back to Maine after nearly 22 years away, to contribute my talents and energy to the local economy and to start a family. In all those years away, when people would ask where I am from, I would proudly say Maine. People were often intrigued. With a full heart and a thoughtful mind, I would explain about our way of life, how we care about each other, how neighbors generally look out for each other, and how we are bound together by our reliance on and appreciation for the land, water, and air that sustains us and so many who visit with us year after year and time after time.

When I first returned and lived on Grand St, in the morning sometimes I would notice a smell, sometimes a little sweet; sometimes a little more noxious. I knew what it was - they were doing something with the oil tanks. "They" were the companies who were my neighbors - in Ferry village or over near in Pleasantdale. When Carly, who was then 1.5 years old, started attending childcare in Spring 2018 in the Ligonja neighborhood, I was pretty excited. We could spend summer afternoons after daycare pickup on the lawn at Fore River Brewing. How cool!

In the warmer weather mornings, as we headed to daycare, we'd turn onto Lincoln street with windows rolled down; singing songs. On many, many days after making the turn; especially in better weather, my throat would start to burn. Quickly I would roll up the windows and switch the air circulator to avoid pulling in outside air. The fumes from that area would choke us. The air smelled like a mix of oil and tar. We couldn't sing anymore, and I'd tell Carly to put my scarf or other clothing item over her nose and mouth to filter out the fumes. As we neared her daycare building, we passed by the Global sign of the nearby tanks.

Often, Carly and her daycare classmates cannot go outside due to the fumes. Hourly, those fumes enter her school's air ventilation system, no matter the weather or season. The other daycares and schools nearby are all dealing with the same issue.

I understand that Global's license revision application is under review. On behalf of my daughter and her classmates, neighbors, and other fellow residents of Portland and South Portland, I urge you to hold Global accountable to the fumes they are putting into the air. Please require that equipment be installed to directly measure as well as treat the toxic emissions coming out of the heated tanks at Global.

Thank you,
Melinda Hull

44 Kaler Road in South Portland

--

“At any moment you have a choice that either leads you closer to your spirit or further away from it.” -

Thich Nhat Hanh

From: [Judith Moll](#)
To: [DEP, Air-Global](#)
Subject: public comment on Global permit for South Portland
Date: Wednesday, June 03, 2020 10:27:34 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.

Dear DEP members:

I am a resident of South Portland, a property owner on Fort Road. As a citizen of South Portland, I want to support all the efforts that the DEP is making to address the air quality in the city. I am especially concerned about the emissions of toxic fumes from the tanks and their cumulative effect on all of us. I am a senior citizen with significant lung issues, in treatment at Mass. General Hospital. I am concerned for all residents, especially our children. I happen to have a family history that makes me especially aware of the cumulative effects of toxic exposure. My father, a metallurgical engineer, died of leukemia which has been attributed to his exposure to benzene. I am aware that benzene is among the toxic fumes being emitted by the South Portland tanks at unsafe levels.

Especially at this time of the Covid-19 pandemic, everything must be done to protect the lung health of our residents. I understand that the oil tanks in South Portland are responsible for nearly 50% of the hazardous air pollutants in our air. It is imperative that the Department of Environmental Protection require companies to utilize the most effective methods possible to contain emissions and bring them down to the lowest level possible.

Through obtaining information from knowledgeable people, most of us thought that a 24/7 infrared monitoring system at the edge of Global's property was the best means of informing the public of what they are breathing. I have heard recently that David Falatko, an environmental engineer, is proposing that certain equipment for monitoring and capturing toxic emissions can be added to the system that Global has submitted in their application. This seems like the very best means to improve the air quality in South Portland. As we continue to struggle through this dangerous time, we South Portland residents are depending on you to require that everything possible is done to improve our air quality. I very much appreciate your efforts toward that goal.

Respectfully,
Judith Moll
149 Fort Road

From: [David Morton](#)
To: [DEP, Air-Global](#)
Subject: Emissions from Global Companies South Portland facilities
Date: Tuesday, June 09, 2020 11:16:11 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: Maine Department of Environmental Protection

Recently a friend of mine purchased a house on Thomas Street, on the west end, near Waynflete School. She went to sit on her new porch to enjoy the evening air, but was dismayed that the 'fresh air' was loaded with the odor of oil tank emissions. Though gravely disappointed, she is now reconsidering her home purchase. Beyond the odor, South Portland has been investigating the possible health effects of these emissions, which I regard as the really important issue.

It is my understanding that the Global Companies have used their own internal methods to determine the appropriate emission standard. I'm certain this was done for the purpose of cost containment. But local and national citizens of the U.S. have long been subsidizing the oil industry and its off-shoots. It seems to me that the time has come for the industry, in this case Global, to return some of that money, at least in the form of equipment to control those emissions.

Specifically, I hope that MEDEP will at least require Global to set its standards in accord with the EPA standards. In a time when renewable energy sources are taking huge steps forward, it makes no sense for Global to be setting its own standards.

I have learned that environmental engineer David Falalko has recommended that Global modify its odor control systems in such a way that would allow measurement of *total* emissions. This would hardly seem to be an excessive burden.

The point of all this is that MEDEP be encouraged to pay careful attention to the health, well-being and comfort of the residents of the South Portland area.

Thank you for your considered attention to my concerns.

David N. Morton
387 Mitchell Road
Cape Elizabeth, ME 04107

From: [Barbara Saulle](#)
To: [DEP, Air-Global](#)
Subject: Global emissions
Date: Thursday, June 11, 2020 10:32:04 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,

My name is Barbara Saulle and I am writing because my family lives very close to the Global tanks, so close that we share a beach. My family moved to South Portland thirteen years ago and we have experienced many severe health problems since we have lived here. I have been complaining for years about the disgusting odors and requested the company call me, but they never have called me back.

Since living here, I have contracted IgA kidney disease and have coughed up blood several times. I have severe sinus issues. I have had two miscarriages. When the ships come in to this tank farm, my eyes burn painfully, turn red and my vision is impaired and I get migraines. My husband had a mass above his sinus passage removed. My husband and our two sons struggle with breathing and migraines. Both my sons have liver disease. I worry about the long term effects for myself and my family and whether I have lost years from my life. If I had the means I would move my family far away from here.

Most of the activity at the Global tanks take place at 3:00 in the morning. It wakes me up and I see mushroom clouds of vapor that are bigger than the tanks themselves. I wonder if they hope few people will notice if they carry on this most dangerous part of their business in the middle of the night. Recently I found a toxic waste sticker that had floated on to the rocks on the beach that I share with Global.

Constant monitoring done by someone with the skills and knowledge of all the scientific information is a must. This monitoring should not be done by the oil industry. I hear that Global is applying for a minor revision of its permit. From what I have been experiencing, I believe some major changes need to be made. I feel I am paying with my life to support profits for Global with no real improvements to these problems. I feel very hopeless.

From: [Katie Yakubowski](#)
To: [DEP, Air-Global](#)
Subject: Oil Tanks in South Portland
Date: Thursday, June 11, 2020 7:40:18 PM

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Hello,

As a citizen of South Portland, I want to express my support for every effort DEP is making to end the severe pollution that people are enduring. I'm most concerned about the little children in the daycare centers near the tanks who have to breathe these toxic fumes. The tank emissions involve multiple toxic chemicals and it has been shown that the resulting cumulative effect is more damaging than a single chemical exposure.

A new method for emissions testing & control has been proposed by David Falatko, an expert in environmental engineering. He is proposing that Global's current plan to install a mist eliminator and dry scrubber & fan to the heated tanks could include two simple add-on devices. One device would gather information about the quantity and toxicities of the emissions coming through which could then if need be treated by the other device. This seems like a good solution that I can heartily support.

Sincerely,
Katie

--



Katie Yakubowski

Outdoor Classroom Coordinator

Pronouns: she, her, hers

Tel: (207) 882-7323 ext. 164

Cell: (207) 349-0550

Email: kyakubowski@chewonki.org

Web: www.chewonki.org



From: janepalmer3@verizon.net
To: [DEP, Air-Global](#)
Subject: My Second Letter
Date: Friday, June 12, 2020 3:38:43 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.

Dear Commissioner Reid and Maine DEP Colleagues,

Although I submitted a letter to you last month regarding the toxic tank air emissions, as one who watched the June 1 meeting of Department of Environmental Protection (DEP) staff and members of the South Portland Clean Air Advisory Committee (CAAC), there is more that I must say.

At the heart of this situation is our lack of true measurements of the amount of these emissions and the toxic chemicals they contain. Accordingly, at the beginning of the June 1 meeting, I was encouraged when Jane Gilbert of the DEP asserted that we must get accurate measurements of the emissions before any determination can be made regarding Global's license revision application.

Most unfortunately, however, it did not appear that any agreement was reached on methods that could be quickly and effectively put in place to monitor the emissions. DEP staff dismissed a proposal from the CAAC for a formula used by oil companies to measure emissions by monitoring vapor pressure in the asphalt tanks. In a similar vein, David Falatko, an environmental engineer, has submitted to both CAAC and DEP a proposal for two limited modifications to equipment already included in Global's application to the DEP. These modifications would be able to accurately measure and also treat the emissions. So far, this creative potential solution has not been favorably received.

Instead, I was greatly concerned to hear DEP staff allude to the cost to Global of these ways of measuring and mitigating the emissions. ***Can it be that corporate profits are to take precedence over the health of people who are absorbing these poisons with every breath?*** We are all – people of South Portland and those (including me) in immediately adjacent communities – in the position of having to rely on you, our Department of Environmental Protection, to take prompt and effective action on our behalf. Please show us that our trust in your vigilance and integrity is not misplaced.

Very sincerely yours,

Jane C. Palmer

31 Stratton Road, Scarborough, ME 04074

Tel.: 207-883-1139 (home), 646-236-6280 (mobile)

From: [Priscilla Skerry](#)
To: [DEP, Air-Global](#)
Subject: Global Oil Emissions, S.Portland
Date: Sunday, June 14, 2020 12:54:56 PM

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**Priscilla Skerry, N.D.,P.A.
Healing Routes
100 Brickhill Ave. Suite 304
S.Portland, ME 04106
Tel: 207 772-5227
Fax: 207 775-3269**

June 12, 2020

Maine Dep. of Environmental Protection
BAQ-Global Partners Project Mgr.
17 State House Station
Augusta, ME 04333-0017

Dear Project Manager,

SARS-CoV-2 and Oil Tank Emissions, What's the connection?

As a Naturopathic Doctor practicing in S.Portland, I have concerns. In the midst of this pandemic it is becoming more clear that not all of us are or will be affected equally. The marginalized, the immune compromised, the elderly (especially those in nursing homes or long term care facilities), these are the majority the SARS-CoV-2 virus is taking from us.

As this pandemic continues, those of us who are left will have to contend with potentially mild to moderate, and in some instances, severe illness...depending upon the resiliency of our immune system and its ability to deal with this virus.

In considering what's happening to the citizens in S.Portland and those in Portland's W.End community living in close proximity to these petroleum tank farms, what connection can be made to the potentially toxic emissions coming from them? How might decisions made—or not— at the local, state and federal levels in regard to these emissions impact the health of communities, the immune systems of all living in their midst? And how can the Maine Department of Environmental Protection (DEP) be strengthened to work in behalf of immune resilience, especially for the most vulnerable? How is immune resilience connected to the impact toxic emissions are having on the health and well being of all citizens, especially pregnant moms and their fetuses living in close proximity to these S.Portland facilities?

In March of this year it was made public that the Federal Environmental Protection Agency (EPA) found discrepancies in Global Partners reported emissions going as far back as 2012. Since March, many of us concerned citizens— and I as a practicing Naturopathic Doctor in S. Portland, and resident of Portland's W.End— have been focusing on Global's licensing requirements and the DEP's response to a proposed permit revision for their tank farm as spelled out in a Consent Decree settlement with the EPA .

When the news first broke about Global's violation of the Clean Air Act, some of you from the Maine DEP

came to the S.Portland City Council, spoke to us. We were told that the DEP had neither the personnel nor financial capability to conduct a proper health study. It appears that no adequate funding or legislation has ever been made available to obtain the much needed “real time” data to prove any connection of these emissions to the health of citizens in their midst. Instead, the Federal EPA, the agency charged with the responsibility of carrying out the mandate of the Federal Clean Air Act (CAA), has allowed the tank farm corporations transporting and storing these oil products to monitor their own emissions via mathematical formulations created by the American Petroleum Institute itself. These only estimate a facility’s capacity to emit. These estimated emissions are then presented to licensing bodies...to you, the Maine DEP. In essence, the oil tank companies are regulating themselves without direct measurement of any actual or *true*, potentially toxic, emissions. This appears to allow a corporate for profit system to disregard the health (i.e. epigenetic and immune consequences) of the public for which the Maine Department of Environmental Protection was set up to serve.

In this past year your department undertook the welcoming but incomplete task of measuring S.Portland’s *ambient* air quality.

I say incomplete because these measurements capture emissions for only brief moments and in only certain places throughout S.Portland and Portland. This testing was not meant to look specifically at tank farm emissions, but to look at community wide toxic emissions from all sources. “It will take time to gather the information,” you told us. Consequently, this has left the health of those living closest to the tank farms at risk for disease...not only acute ones like asthma and COPD, but also the more insidious chronic and inflammatory ones like obesity, cardiovascular, pulmonary disease, cancer, autoimmune and even genetic ones involving moms and their fetuses. Though there are not yet enough studies to prove a relation to these there is enough scientific evidence that the consequences to our health and immune status from these exposures are real, and great, and growing.

In the midst of all this, the travesty goes on via a Consent Decree, approved by our Federal Court system, that appears to be allowing Global Partners, not to mention all the other oil tank farm owners, to not only renew their license, but by some slight of hand trick to recalculate their emissions, make it look like the toxic emissions being allowed to escape from their facilities are less, when in fact, they may be many times more.

A new mathematical formula for estimating potential emissions appears to have been rewritten by the American Petroleum Institute. It took effect last year. By all appearances, this formula has enabled Global to retroactively apply it to their 2018 emission calculations making these *appear* much lower than their license allows for. In addition they are asking for an increase in throughput of product which, by the looks of it, would allow for dramatically increased product (and therefore emissions!) that could be moved and stored by their facility, an increase that would not be accounted for in their licensed emission threshold! How can this be, and if so, does the ME DEP have the authority and power to prevent and/or correct what appears to be a glaring fabrication?

Given the pandemic and the health risks we all now face, it behooves our Federal, State and *most* especially our local government to step up and *require* Global Partners (and all tank farm owners) as part of their response to any EPA violation, to install—at their expense—methods requiring use of “true” vapor pressure values in accordance to an AP-42 methodology brought to our attention by the S.Portland Clean Air Advisory Board. This would allow real time emissions monitoring. (And any information from the monitoring must be made public so that citizens, in partnership with the Maine DEP, can address the issues that threaten their health and well being.)

Action must be taken to include real time measurement of vapor pressures. It is imperative that methods be determined and put into action *now* to capture or contain any toxic VOC’s or HAP’s that will be breathed in by those living in close proximity to these tanks.

Having attended and followed virtually all the City Council and Clean Air Advisory Committee meetings

set up by the S.Portland City Counsel to deal with this concern, I support the CAAC conclusions thus far, and their demand for action. They too have expressed real concerns about the accuracy of Global's estimated emissions. No more delusive and palliative references made about installing *odor controlling* devices, as if this is the only thing we citizens are concerned about. However, if these devices can be used to provide real time data on emissions, they must be fitted for such a purpose to do so.

I pray you take advantage of the opportunity you have to improve the air quality, protect the health of South Portland and Portland citizens living in close proximity to these tank farms. I pray that you have the wisdom and courage to act immediately on behalf of the health of us all. Preventing the escape of harmful petroleum vapors into the air we all breathe will go a long way toward protecting people, our environment and future generations.

With the deepest respect and hopes,

Dr. Priscilla Skerry

Priscilla Skerry, N.D.
Concerned citizen and Naturopathic Doctor

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: [Louisa Beckett](#)
To: [DEP, Air-Global](#)
Subject: Global Oil, Air Emissions
Date: Tuesday, June 16, 2020 4:34:43 PM

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As a retired teacher, who has taught at Kaler Elementary School in South Portland, I am especially concerned about the health of the children who are breathing these toxic emissions. It is important to know the quantity and toxicity of emissions, all of us are breathing.

David Falatko, an environmental engineer, is proposing that certain equipment for monitoring and capturing these toxic emissions can be added to the system that Global has submitted in their application to the you. The equipment would gather information about the quantity and toxicity of the emissions, which could then, if needed, be treated. I support this solution. We need to know what is in the air we are breathing. It is important that Global and all oil tank companies be held accountable for their emissions.

I encourage you to take strong action on our behalf.

Sincerely,

Louisa B. Beckett
7 Brenton Street
South Portland, ME
04106

From: [Abby Huntoon](#)
To: [DEP, Air-Global](#)
Subject: Comments regarding Global's permit revision
Date: Tuesday, June 16, 2020 5:45:15 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.

Attention Commissioner Maine DEP,

Protect South Portland was founded with the mission to “promote actions and practices that serve to protect the environment and health and welfare of South Portland.” With this as our mission we have found it mandatory to work with our community to continue to fight for clean air and protect the health of our residents. When it came to our attention that Global had violated its permit and was releasing more than its allowable emissions and we continued to hear disturbing stories that neighbors of these tanks are having various symptoms, including respiratory problems and headaches, we felt it important to act. We have been seeking the swiftest remediation from these emissions so the residents of the South Portland area do not have to suffer any further.

According to DEP’s mission statement the first line reads, “Legislative mandate directs the DEP to prevent, abate and control the pollution of the air, water and land.” It is shocking that there has been no consistent monitoring of the emissions from the tank facilities to determine if that mission is being fulfilled. We know that there is technology that can continuously measure actual emissions and technology that can seriously reduce harmful emissions.

It is your responsibility to hold Global and other tank farms accountable to the law. We seek that you act quickly on the following:

Require a better accounting of emissions. There is good reason to believe, based on public information and actual onsite testing, that Global emits far more VOC’s than either its estimated potential emissions or the amount allowed by its permit. The DEP should require that Global’s proposed “odor control” devices be outfitted with continuous monitoring technology so that regulators and residents can know what is being emitted and whether those emissions pose a health risk. If that’s not possible, the state should, at the very least, require a more accurate estimate of Global’s emissions, including a full accounting of emissions from its heated tanks using true vapor pressure.

Conduct a more honest review of changes at Global’s tank farm. The DEP should reconsider its decision to treat this application as only a minor revision, a designation intended to be used for small administrative changes. The company has proposed significant alterations to its infrastructure and to the terms of its business (with the potential for a dramatic increase in the product it moves through the facility each year). That’s far more than an administrative change. On top of that, this application was mandated by the court after the DOJ made serious allegations that the company repeatedly and knowingly violated the Clean Air Act in ways that could have serious consequences for the health of Global’s neighbors. The matter deserves a more complete review by the DEP.

Create a clearer path for the state to assess the health effects of emissions exposure. There is a disconnect between the CDC standards set to protect public health and the DEP

regulators who serve as the most direct check on the companies that pose a potential public health risk. The DEP should use the study bill sponsored by Sen. Millett as an opportunity to remedy that. The state must take a more proactive approach toward protecting public health. The residents of the state require it as does DEP's own mission statement which states, **"We value a clean environment where public health and natural heritage are protected"**.

With the revision of Global's permit pending now is the time to take aggressive steps to require monitoring that is 24/7 with the information of the different chemicals being emitted available to the public. The meeting on June 1 was attended by 100 people and many more tried to get on but the quota for the zoom meeting had been filled. Doesn't this show to the commission the concern that our residents have for their health and that they deserve to know that improvements will happen as soon as possible? Should the profits for Global take precedent over people's health?

Respectively submitted,
Rachel Burger
for Protect South Portland

From: [Rachel Healy](#)
To: [DEP, Air-Global](#)
Subject: Comment re: Global emissions license
Date: Tuesday, June 16, 2020 7:12:18 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.

I write to add my support for the recommendations put together by the Clean Air Advisory Committee regarding Global Partners' license renewal.

I am raising two young children in the Meeting House Hill neighborhood, one with a congenital heart condition. I urge you to do everything in your power to reduce toxic emissions from the storage tanks so that my children can grow up in a safe and healthy environment.

Thank you for your time.

Sincerely,
Rachel Healy
34 Bellaire Rd
South Portland

From: [Andrew Butcher](#)
To: [DEP, Air-Global](#)
Subject: South Portland Oil Tank Permit Renewal
Date: Wednesday, June 17, 2020 7:23:41 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,

Last night on a beautiful night in Maine - I had to shut the windows to my 7 year old daughter's bedroom because the smell of petroleum and tar was giving her a headache and making her throat hurt. There was a slight breeze coming from the south - and I live due north of South Portland's Global and Sprague Oil Tanks.

This is a frequent phenomenon. Over the course of the last 10 months I and my neighbors in Portland have filed hundreds of registered complaints about the petroleum odor and physical effects of under regulated oil tank emissions. I have sat in dozens of hours of meetings in South Portland trying to better understand, share my concerns and work with local officials and community volunteers to find some better solutions.

I know who you are at the DEP. You are not a faceless governmental bureaucracy. You do not work there because you wish ill health to anyone. You work where you work because you care about our community and environmental health. It may feel like you don't have power to impact these issues as you battle many years of budget cuts, disinvestment and understaffing. But you do.

We can require a better accounting of emissions from Global and all other Tank Operators. The DEP should require that Global's proposed "odor control" devices be outfitted with continuous monitoring technology so that regulators and residents can know what is being emitted and whether those emissions pose a health risk. If that's not possible, the state should, at the very least, require a more accurate estimate of Global's emissions, including a full accounting of emissions from its heated tanks using true vapor pressure.

You may even feel that the scientific evidence isn't sufficiently verified yet. Given the events of the last year and the close to 500 odor complaints in South Portland and Portland in the last 10 months - you must conduct a more honest review of changes at Global's tank farm - anything less would erode the trust and legitimacy of the DEP.

Ultimately, we need to create a clearer path for the state to assess the health effects of emissions exposure. There is a disconnect between the CDC standards set to protect public health and the DEP regulators who serve as the most direct check on the companies that pose a potential public health risk. The DEP should use the study bill sponsored by Sen. Millett as an opportunity to remedy that. The state must take a more proactive approach toward protecting public health. The residents of the state require it, as does DEP's own mission statement which states "We value a clean environment where public health and natural heritage are protected".

Please read this appeal knowing that you do have the power to stop a 7 year old's eyes from burning as she goes to sleep. She chose her room because she could get a glimpse of the river. Now I fear that is the reason she shows signs of asthma.

Please show the community that you do in fact have the power and intent to work to protect our environment and our health.

Thank you,
Andrew Butcher
380 Danforth St.
Portland, ME. 04102

--

Andrew Butcher

C: 303.570.5018

[LinkedIn](#)

From: [Paul Cunningham](#)
To: [DEP, Air-Global](#)
Subject: Global Permit Review
Date: Wednesday, June 17, 2020 9:46:06 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 members of the Maine Department of Environmental Protection-

So, Global Partners is seeking a license revision. Knowing they have already broken their previous emissions promises, according to law, I think Global Partners should be told to pull up stakes and get out of my town and our state. My city smells bad and I want justice.

Global's license application actually moves to increase their volume of product by 500%. You tell me when some law breaker gets even more leeway, ex post facto, so their previous infraction fits within permitted guidelines. This is some sort of sick joke.

Global is proposing the installation of a mist eliminator, a dry scrubber, and an exhaust fan. Environmental engineer David Falatko has come up with a plan to modify or add to these instruments to measure and potentially capture toxic emissions coming from Global's tanks. If Global has any intention of following the rules, they will be open and willing to provide, at their own expense, these modifications OR some sort of trusted direct source emissions monitoring.

Keep this one thing in mind: If it smells bad, it IS bad. We can test, and we must, but if you are in your house and you use some noxious glue, for example, you will almost certainly open your window in order to allow fresh air to enter. You don't need to do any testing in your home; you simply KNOW that fresh air from outside is the safer alternative. Our air smells bad, so we know it IS bad, but we can't add any fresh air.

Please consider the obvious,
Paul Cunningham
20 Edwards Street
South Portland Maine 04106

From: [David Fortier](#)
To: [DEP, Air-Global](#)
Subject: Global
Date: Wednesday, June 17, 2020 10:11:57 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.

Commissioners,

Every day Mainers are fighting for their lives against Covid 19, struggling to breathe. Because the oil tanks in South Portland are responsible for nearly 50% of the Hazardous Air Pollutants in our air, we beg you, the Department of Environmental Protection, to oblige the companies to take effective measures to contain emissions, once and for all. Through obtaining information from knowledgeable people, most of us thought that a 24/7 infrared monitoring system at the edge of Global's property was the best means of informing the public of what they are breathing. I have heard recently that David Falatko, an environmental engineer, is proposing that certain equipment for monitoring and capturing toxic emissions can be added to the system that Global has submitted in their application. This seems like the very best means to improve the air quality in South Portland.

As we continue to struggle through this dangerous time we would be most grateful for all your efforts.

David Fortier

From: [Eva Goetz](#)
To: [DEP, Air-Global](#)
Subject: Reviewing Global Partners Permit?
Date: Wednesday, June 17, 2020 2:22:57 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.

HI,

I am a resident of the Knightville neighborhood in South Portland.

I have stood with my neighbors as we fight for clean safe unpolluted air.

Isn't it amazing in the year 2020 I would be arguing for the ability to walk outside my house, unconcerned about the amount of PAPs I and my community are breathing in. Some mornings the air is so thick with odor and contamination it burns my eyes.

The age of Covid is upon us.

High risk neighbors are made more vulnerable by air pollution.

As the DEP considers renewing Global's permit.

I urge you to review Global's past practices and recommend not re-issuing the permit unless:

1.
We do not know the exact amount of VOC's emitted and plans Global has in place for mitigating their emissions. Global must install monitoring systems and 'prove' that the mitigation equipment installed not only scrub odors, it also sequesters toxins. NO toxic fumes should impact the health of our community.
2.
Global has promised to instal devices for controlling odor emitted from it's tanks in South Portland and to this date this has not happened. Before permits are reissued odor control, at the very least, must be placed.
3.
Constant monitoring must be in place.
4.
The community needs to know what it inhales.
5.
We must review what is truly healthy for our community. Is the 50 ton limit currently placed in the best interest for community health and the environment? We know true emissions data may show that Global may be emitting even more than the 50 ton

quota now deemed safe. Are the penalties placed on Global strict enough to assure compliance?

6.

Comply with South Portland's Clear Air Advisory Committee's recommendations that have been submitted by South Portland City Council.

In conclusion: Global must be held accountable.

I also urge the DEP to take a more comprehensive look at regulating the environmental impacts from tank farms in Maine, as well as communal health consequences from toxic emissions. WE need the DEP to stand with our community as a partner for health in Maine.

Thank you,

Eva Rose Goetz
46 C Street
South Portland 04106

From: [Plastology 2100](#)
To: [DEP, Air-Global](#)
Subject: Global emissions
Date: Wednesday, June 17, 2020 7:33:27 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.

Hello,

I'm writing to demand that you stop classifying Global South Portland as a minor emitter. We need more accurate testing of their emissions and demand that they get the Best Available Control Technology which can reduce emission by 95%. This is imperative. We are in the midst of the breakdown of our biosphere. Our planet is dying and so are we. We are going extinct. You MUST crack down on their emissions.

Dr. Katherine Greenfield PsD
she | her | hers

The Real Institute of Plastological Sciences
<https://instagram.com/plastology2100>

From: [Jen Joaquin](#)
To: [DEP, Air-Global](#)
Subject: Global
Date: Wednesday, June 17, 2020 12:29:34 PM

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Good afternoon- As a citizen of South Portland I want to express my support for every effort DEP is making to end the severe pollution that people are enduring. I'm most concerned about the little children in the daycare centers near the tanks who have to breathe these toxic fumes. The tank emissions involve multiple toxic chemicals and it has been shown that the resulting cumulative effect is more damaging than a single chemical exposure. A new method for emissions testing & control has been proposed by David Falatko, an expert in environmental engineering. He is proposing that Global's current plan to install a mist eliminator and dry scrubber & fan to the heated tanks could include two simple add-on devices. One device would gather information about the quantity and toxicities of the emissions coming through which could then, if need be be treated by the other device. This seems like a good solution which I can heartily support.

thank you,
Jen Joaquin

--



Jen Joaquin
Artist
Vibrant Art Studios

 vibrantartstudios@gmail.com
 www.vibrantartstudios.com
www.theumva.org
 South Portland, ME



From: [Bob Klotz Jr](#)
To: [DEP, Air-Global](#)
Subject: Global Inc. Application
Date: Wednesday, June 17, 2020 10:42:52 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.

I am writing regarding my significant distress regarding the ongoing pollution experienced in my neighborhood.

As documented, inadequately, via numerous resources (including the DEP, the Smell My City App and the direct experience of many, based on odors and associated symptoms), the level of air pollution in South Portland — particularly associated with fossil fuel related activities, is completely unacceptable.

So too, is the response — for too many years — of our governmental representatives and regulatory agencies. Though grassroots citizen activism has effectively raised the awareness and attention regarding these concerns, it remains too little, too late — with an ongoing reference to a wait-and-see (with further studies) approach.

This is maddening — truly maddening — both on the level of emotional distress and the feeling of anger. And the risk to the health of me, my family and the community in which I live.

The citizens of South Portland (and beyond) deserve optimal protection — and full honesty. Further, the fossil fuel companies that have been responsible for toxic exposures need to be held accountable, including regarding the installation of optimal protective options, immediately.

As has been suggested by other sources, the following items are essential to an adequate — and minimal — approach to this problem. Ultimately, the DEP MUST hold Global, Sprague and other tank farms fully accountable to health and safety impacts — and the law.

The DEP must:

- **provide a full accounting of emissions** -- including via continuous monitoring technology. At minimum (and this is not adequate): a more accurate estimate of Global's emissions is needed, including via a full accounting of emissions from its heated tanks using true vapor pressure.
- **an optimal review of changes at Global's tank farm is**

ESSENTIAL: clearly the realities at Global involves more than minor revisions; notable alterations and the potential for increased product movement reinforces significant risks. Global violated the Clean Air Act: there needs to be adequate oversight of a company that cannot be trusted -- and consequences for their destructive action.

- **the health effects of emissions exposure MUST be documented and clearly identified.** The cause-and-effect impacts of fossil fuels have been clearly defined for decades: we don't need to waste resources proving that again...but we do need to identify the realities "on the ground" (and in the air...and the water). I -- and many others -- feel frustrated by the seeming impotence of the Maine DEP. As has been stated (and frankly, expected): the state must take a more proactive approach toward protecting public health.

We are already significantly behind the curve on this issue and the delay in attending to numerous risks is unacceptable -- as is any further distraction (or justification) leading to further risk exposures.

Please take aggressive action with regard to the Global, Inc. application: given their toxic and less-than-fully-honest business practices, they should be held (including responsible) to the highest standard.

Your responsibility to protect the environment -- and all of us -- requires nothing less.

Thank you.

Robert Klotz, Jr.
10 Whitehall Avenue
South Portland

From: [Morelli,Scott](#)
To: [DEP, Air-Global](#)
Cc: [dplumb](#); ["Adrian P. Kendall"](#); [Anthony Moffa](#); [Brienne Hicknell](#); [Josh Cutler](#); [Rebecca Boulos](#); [Tom Mikulka](#); [Caricchio, April](#); [Morgan, Claude](#); [Dhalac, Deqa](#); [Lewis, Kate](#); [Bruzgo, Katelyn](#); [Pride, Misha](#); [Henderson, Susan](#)
Subject: RE: Comments from South Portland related to Global License Amendment
Date: Wednesday, June 17, 2020 3:18:17 PM
Attachments: [image002.png](#)
[Letter - DEP - Global License Amendment Comments.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.

Updated with corrected date – thank you

[Scott Morelli, CMM, ICMA-CM](#)
City Manager | City of South Portland

From: Morelli,Scott
Sent: Wednesday, June 17, 2020 3:14 PM
To: 'Air-Global.DEP@maine.gov' <Air-Global.DEP@maine.gov>
Cc: David Plumb <dplumb@cbi.org>; Adrian P. Kendall <akendall@nhdlaw.com>; Anthony Moffa <anthony.moffa@maine.edu>; Brienne Hicknell <brienne.hicknell@gmail.com>; Josh Cutler <josh.cutler@maine.rr.com>; Rebecca Boulos <rebecca.boulos@gmail.com>; Tom Mikulka <mikulka.tom@gmail.com>; April Caricchio (acaricchio@southportland.org) <acaricchio@southportland.org>; Claude V. Z. Morgan (cmorgan@southportland.org) <cmorgan@southportland.org>; Deqa Dhalac (ddhalac@southportland.org) <ddhalac@southportland.org>; Kate White Lewis (klewis@southportland.org) <klewis@southportland.org>; Katelyn Bruzgo (kbruzgo@southportland.org) <kbruzgo@southportland.org>; Misha Pride (mpride@southportland.org) <mpride@southportland.org>; Susan Henderson (shenderson@southportland.org) <shenderson@southportland.org>
Subject: Comments from South Portland related to Global License Amendment
Importance: High

Please see attached comments. Thank you.

[Scott Morelli, CMM, ICMA-CM](#)
City Manager | City of South Portland
25 Cottage Road, South Portland, ME 04106
207-767-7606 | 207-767-1620 (fax)
smorelli@southportland.org
facebook.com/cityofsouthportland | [@CityofSoPo](#)

WE WILL EVER STRIVE FOR THE IDEALS AND SACRED THINGS OF THE CITY, BOTH ALONE AND WITH MANY;

WE WILL UNCEASINGLY SEEK TO QUICKEN THE SENSE OF PUBLIC DUTY;

WE WILL REVERE AND OBEY THE CITY'S LAWS;

WE WILL TRANSMIT THIS CITY NOT ONLY NOT LESS, BUT GREATER, BETTER AND MORE BEAUTIFUL THAN IT WAS TRANSMITTED TO US.

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: [Anna O'Sullivan](#)
To: [DEP, Air-Global](#)
Subject: Global tank emissions concerns
Date: Wednesday, June 17, 2020 8:23:08 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.

Hello,

My name is Anna O'Sullivan and I'm a resident of South Portland, in very close proximity to the Global tank farms, and I'm very concerned about the emissions coming from those facilities, and the others like them. I worry not only about my own health, but more about the health of my two year old son. It's easy to think these emissions are no big deal, but they are to the people most directly affected by them. I have had regular, persistent headaches, as well as eye and throat irritation since moving into my home by the tanks in 2017. I don't know what that means for my long-term health, but I doubt it's good. My son, Henry is too young to tell me how he feels, but he coughs a lot these days, and I'm riddled with guilt that he very well might have asthma as a result of living here.

The residents of Maine are counting on you folks at the DEP to protect our health and the health of the environment. This is a big deal, and it's an opportunity for you to prove that your mission statement stands for something real: *"We value a clean environment where public health and natural heritage are protected."*

Don't let the legitimacy of the DEP disappear. We need you now.

Global must be held accountable for the effects of their operations, and the technology exists for this to happen. I don't pretend to understand all of the science, but I've been listening to those who do, and it's clear that we can and should insist on better.

- **Require a better accounting of emissions.** There is good reason to believe, based on public information and actual onsite testing, that Global emits far more VOCs than either its estimated potential emissions or the amount allowed by its state permit. The DEP should require that Global's proposed "odor control" devices be outfitted with continuous monitoring technology so that regulators and residents can know what is being emitted and whether those emissions pose a health risk. If that's not possible, the state should, at the very least, require a more accurate estimate of Global's emissions, including a full accounting of emissions from its heated tanks using true vapor pressure.

- **Conduct a more honest review of changes at Global's tank farm:** The DEP should reconsider its decision to treat this application as only a minor revision, a designation intended to be used for small administrative changes. The company has proposed significant alterations to its infrastructure and to the terms of its business

(with the potential for a dramatic increase in the amount of product it moves through the facility each year). That's far more than an administrative change. On top of that, this application was mandated by the court after the DOJ made serious allegations that the company repeatedly and knowingly violated the Clean Air Act, in ways that could have serious consequences for the health of Global's neighbors. The matter deserves a more complete review by the DEP.

- Create a clearer path for the state to assess the health effects of emissions exposure. There is a disconnect between the CDC standards set to protect public health and the DEP regulators who serve as the most direct check on the companies that pose a potential public health risk. The DEP should use the study bill sponsored by Sen. Millett as an opportunity to remedy that. The state must take a more proactive approach toward protecting public health. The residents of the state require it, as does DEP's own mission statement, which states "We value a clean environment where public health and natural heritage are protected".

I hope you will stand up for your community and hold Global and the other oil companies to task on being responsible neighbors. Our health is literally at stake.

Sincerely,
Anna O'Sullivan
61 Atlantic Ave.
South Portland ME 04106

From: [Ginny Schneider](#)
To: [DEP, Air-Global](#)
Subject: Odor of Oil in South Portland
Date: Wednesday, June 17, 2020 5:53:10 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:

We lived in Portland but our landlord converted out apartment to an air BNB. The only place we could find in our price range was in South Portland. Little did we know that we would be subjected to toxic fumes from the oil tanks.

Although I was unaware of the fumes before moving here, I had canvassed for Clean Elections in South Portland five years ago. At that time, I noticed that most of the people living in the four houses or so adjacent to the tanks were all sick. Makes you think!

It seems as though it is really bad at night.

Whatever you can do to clean up the situation would be appreciated.

Sincerely,

Ginny Schneider

From: [Julia St.Clair](#)
To: [DEP, Air-Global](#)
Subject: Comments
Date: Wednesday, June 17, 2020 7:30:02 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.

I am writing to express my concerns about the air pollution from the oil tanks in South Portland and in support of calls for better monitoring of Global.

I think we need to be protecting Portlanders and ensuring that everyone has clean air to breath as well as reducing carbon emissions and air pollution in general!

The DEP is in a position to provide this protection to citizens rather than prioritize what Global is trying to do.

I would also like to express my support for David Falatko's proposal which would provide a way to have actual measurements of emissions on the heated tanks and also the capacity to effectively reduce the amount of emissions.

I hope that the DEP will take action to protect the health and well being of Maine's residents and the planet.

Thank you,

--

Julia St.Clair

From: [Shelley Swift](#)
To: [DEP, Air-Global](#)
Subject: Environmental protection, so protect our environment
Date: Wednesday, June 17, 2020 11:58:06 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 citizens of South Portland, and Portland, need to know that a change has occurred in the way oil tank companies will be held to account for their emissions. Global Oil has applied for a license revision that will include 5 times the amount of product that they will be allowed to handle than they have averaged over the last several years. At the same time, the new mathematical formula of their emissions has reduced that amount by 75% because it is not using true air pressure in its calculations. This means that instead of unloading, say, 2 tankers per week, they could potentially unload 10 tankers per week. How can this happen? This is possible only if there is no actual monitoring done. Our first concern is that MEDEP has not required Global to use true vapor pressure in calculating their emissions despite the fact that the most recent version of AP-42 references the use of true vapor pressures on pages 23 and 81.

It is our understanding that when the true vapor pressures for # 6 fuel oil and asphalt determined in 2013 (as required by EPA Region 1) are used, Global significantly exceeds their current permitted emissions and becomes a major emitter. David Falatko's proposal would provide a way to have actual measurements of emissions on the heated tanks and also the capacity to effectively reduce the amount of emissions. The DEP is in a position to provide our only protection. I encourage you to take strong action on our behalf.

Best,
Shelley

--

Shelley Swift, REALTOR®
Maine Home Connection

19 Commercial Street
Portland, Maine 04101

Cell: (207) 400-9345

Wire Fraud is Real. Before wiring any money, call the intended recipient at a number you know is valid to confirm the instructions. Additionally, please note that the sender does not have authority to bind a party to a real estate contract via written or verbal communication.

Sent from Gmail Mobile

From: [bruce taylor](#)
To: [DEP, Air-Global](#)
Cc: [bruce taylor](#)
Subject: Comments RE: Global air emissions
Date: Wednesday, June 17, 2020 1:42:44 PM
Attachments: [Global License DEP.docx](#)

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.

Attached are my comments. Thank you.

Bruce Taylor

From: [Bob Tkacik](#)
To: [DEP, Air-Global](#)
Date: Wednesday, June 17, 2020 10:09:16 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.

Every day Mainers are fighting for their lives against Covid 19, struggling to breathe. Because the oil tanks in South Portland are responsible for nearly 50% of the Hazardous Air Pollutants in our air, we beg you, the Department of Environmental Protection, to oblige the companies to take effective measures to contain emissions, once and for all. Through obtaining information from knowledgeable people, most of us thought that a 24/7 infrared monitoring system at the edge of Global's property was the best means of informing the public of what they are breathing. I have heard recently that David Falatko, an environmental engineer, is proposing that certain equipment for monitoring and capturing toxic emissions can be added to the system that Global has submitted in their application. This seems like the very best means to improve the air quality in South Portland.

As we continue to struggle through this dangerous time we would be most grateful for all your efforts

-bob tkacik

From: [Liz Trice](#)
To: [DEP, Air-Global](#)
Subject: Air quality in South Portland/Portland
Date: Wednesday, June 17, 2020 10:27:15 AM

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Dear DEP staff,

I was unhappy to hear that the DEP is considering increasing the amount of emissions allowed by Global in South Portland, while hundreds of people have been complaining about odors and health issues. The DEP should require that Global's proposed "odor control" devices be outfitted with continuous monitoring technology so that regulators and residents can know what is being emitted and whether those emissions pose a health risk. Beyond that, the DEP should really be committed to proactively protect and further public health as its *primary* aim, and to be raising the standards of public health over time! Your mission statement states "We value a clean environment where public health and natural heritage are protected", and we expect you to adhere to that at the highest level.

Please let me know if there is anything I can do to support you in that mission.

Liz Trice
297 Brackett Street
Portland, ME 04102

"Whatever you do, or dream you can, begin it. Boldness has genius and power and magic in it."

"Lo que usted puede hacer, o soñar que puedes, comenzar. La audacia tiene genio, poder y magia en ella."

- Johann Wolfgang von Goethe / William Hutchison Murray

From: [Doug von Werssowetz](#)
To: [DEP, Air-Global](#)
Subject: South Portland Air Quality
Date: Wednesday, June 17, 2020 10:07:51 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,

I don't want to continue to worry about my 19 month olds health and well being simply because of the air he's breathing. He is too young to tell me if he feels dizzy, nauseous, or has a headache when we can smell the local tank fumes, but I know that's how I feel. Why, in 2020, when there are significant advances in technology to eliminate nearly all the toxic chemicals that Global produces (and the other companies in South Portland) is this even an issue. Why isn't the Maine DEP (Department of Environmental PROTECTION) taking actions to PROTECT the environment and the people who live here. Why aren't we actively trying to take progressive actions to make living here better. I love South Portland. I love Maine. I want to be proud of the place that I live, but I don't understand why this isn't being dealt with.

I HOPE YOU DO THE RIGHT THING! Make these corporations accountable for a clean environment for EVERYONE!

Thank you,
Doug von Werssowetz
61 Atlantic Ave.
South Portland, ME 04106

From: [Roberta Zuckerman](#)
To: [DEP, Air-Global](#)
Subject: Comment on Global Permit
Date: Wednesday, June 17, 2020 4:13:58 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 Commissioner Reid,

We know that business is an important part of our nation and our economy. we run into trouble though when a business puts profits above concern for the health & welfare of people. A business succeeding should not be at the expense of the health of the community. Doing business responsibly should be considered part of the cost of being allowed have a business in our city or state. Permit limits and requirements are a way to monitor business practices.

The EPA having found Global to be in violation of their permit has provided an opportunity to take a look at how the business of oil tanks in our City and state are doing business.

We are looking to DEP to take robust action to ensure that the oil tanks in our City have continuous emissions monitoring and are using the best available control technology. Technology exists to do that - what is needed is the will. The DEP has the legal ability to include more stringent requirements then the Global Consent Decree. Please don't pass up this opportunity.

The DEP must hold Global and other tank farms accountable to the law. To do that, it must:

- *Require a better accounting of emissions.* There is good reason to believe, based on public information and actual onsite testing, that Global emits far more VOCs than either its estimated potential emissions or the amount allowed by its state permit. The DEP should require that Global's proposed "odor control" devices be outfitted with continuous monitoring technology so that regulators and residents can know what is being emitted and whether those emissions pose a health risk. If that's not possible, the state should, at the very least, require a more accurate estimate of Global's emissions, including a full accounting of emissions from its heated tanks using true vapor pressure.

- *Conduct a more honest review of changes at Global's tank farm:* The DEP should reconsider its decision to treat this application as only a minor revision, a designation intended to be used for small administrative changes. The company has proposed significant alterations to its infrastructure and to the terms of its business (with the potential for a dramatic increase in the amount of product it moves through the facility each year). That's far more than an administrative change. On top of that, this application was mandated by the court after the DOJ made serious allegations that the company repeatedly and knowingly violated the Clean Air Act, in ways that could

have serious consequences for the health of Global's neighbors. The matter deserves a more complete review by the DEP.

- *Create a clearer path for the state to assess the health effects of emissions exposure.* There is a disconnect between the CDC standards set to protect public health and the DEP regulators who serve as the most direct check on the companies that pose a potential public health risk. The DEP should use the study bill sponsored by Sen. Millett as an opportunity to remedy that. The state must take a more proactive approach toward protecting public health. The residents of the state require it, as does DEP's [own mission statement](#).