



BUCKEYE PT TERMINALS LP

**Buckeye's Response to Public Comments Received
on the Planned Submittal of an Air Permit
Application to CTDEEP for Existing Internal Floating
Roof Storage Tanks 30M, 31M, and 32M at the
Buckeye New Haven Forbes Terminal**

November 6, 2025

This document, prepared by Buckeye PT Terminals LP (Buckeye), includes responses to all comments received regarding the Buckeye New Haven Forbes Terminal planned submittal of a New Source Review (NSR) Air Permit Application for Tanks 30M, 31M, and 32M including:

- Responses to questions/comments received in-person at the October 7, 2025, Public Meeting at New Haven City Hall Meeting Rooms 1&2;
- Responses to questions/comments received via electronic mail or regular mail; and,
- Responses to questions/comments received via return postcard from mailing sent to addresses within ½-mile of the facility.

Responses and the reference attachments along with the meeting video are posted at the following location: <https://www.buckeye.com/event/new-haven-forbes-terminal-public-meeting>

Questions/comments received during the October 7, 2025, public meeting held at New Haven City Hall are listed below. The community question/comment is listed first, followed by Buckeye's response to the question/comment.

Permitting and Emissions Questions

Question/Comment 1: Why is Buckeye permitting the tanks now? Was there a mistake in the original submittal?

Buckeye Response to Question 1: Prior to the initial construction of Tanks 30M, 31M, and 32M in 2004, the former terminal owner evaluated their potential to emit (PTE) volatile organic compounds (VOC) using the standard methodology at that time, which did not incorporate emissions from roof landings or tank cleanings, as guidance for calculating those emissions had not yet been issued by the United States Environmental Protection Agency (USEPA). The resulting analysis by the former terminal owner determined that the PTE for each tank was below both the 15 ton per year (TPY) threshold that would require a Connecticut New Source Review (NSR) permit and the 25 TPY threshold that would require USEPA non-attainment NSR major modification permitting. As a result, the prior owner submitted a minor modification request to the existing Title V air permit, which the Connecticut Department of Energy and Environmental Protection (CTDEEP) approved (application available on the above referenced website). In 2022, CTDEEP revised its PTE calculation methodology to assume tanks are emptied and refilled with the internal floating roof (IFR) landing each time at maximum throughput rates, resulting in increases in PTE estimates. Using the revised methodology issued by CTDEEP, Tanks 30M, 31M, and 32M would have exceeded the aforementioned PTE thresholds and would have required an NSR permit.

On March 22, 2023, CTDEEP conducted a records review and subsequently issued a Notice of Violation (#18396) to the Buckeye New Haven Forbes Terminal alleging Tanks 30M, 31M, and 32M were constructed and have been operating without the required NSR Permit, stating that each tank has a potential to emit in excess of the 15 tons VOC/year NSR applicability threshold. To resolve the violation, Buckeye will submit an NSR permit application for the three (3) tanks noted in the violation. The application will cap the VOC emissions to 14.9 tons of VOC per tank and 24.9 tons of VOC total for the three (3) tanks. Additionally, Buckeye will agree to use controls to degas

the tanks when they are cleaned. There will be no modifications to the existing tanks or the primary and secondary floating roof seals and deck fittings, the products allowed to be stored, or the tank throughputs. Additionally, there will not be any changes to the operation of the truck loading rack.

Question/Comment 2: What are Buckeye’s Permitted and Actual Emissions at the New Haven Forbes Terminal?

Buckeye Response to Question/Comment 2:

Permitted Facility Emissions

A summary of the currently permitted emissions and throughput limits is provided in **Attachment 1**. The full permit can be viewed on the CTDEEP website at [p-117-0270-tv.pdf](#).

Actual Facility Emissions

A summary of the actual VOC emissions from the last three (3) years are provided in **Attachment 2**. The emission inventories submitted to CTDEEP for reporting years 2022, 2023, and 2024 are also posted separately on the website address above.

Question/Comment 3: Will Buckeye provide emissions information from the other Buckeye Facilities in the Harbor?

Buckeye Response to Question/Comment 3: Yes, Buckeye is providing emission information reported to CTDEEP for the New Haven Waterfront Terminal and the New Haven 85 East Terminal.

The emission inventories submitted to CTDEEP for reporting years 2022, 2023, and 2024 for the New Haven Waterfront Terminal are also posted separately on the website address above.

Buckeye is also providing annual emissions information for the New Haven 85 East Terminal. This terminal was required to obtain an RCSA 22a-174-33a permit in 2023 due to the reclassification of New Haven County from serious to severe for ozone. The terminal was not required to submit annual compliance reports prior to this change. As a result, annual compliance reports were not submitted prior to 2023. However, the first page of the annual compliance reports for 2023 and 2024 for the New Haven 85 East Terminal are posted separately on the website address above.

Question/Comment 4: Are the Buckeye terminals in New Haven Harbor considered co-located for air permitting purposes?

Buckeye Response to Question/Comment 4: No. In 2023, CTDEEP completed an evaluation to determine if Buckeye’s facility located at 85 East Street, New Haven is “adjacent” or “contiguous” to either the property located at 280 Waterfront Street, New Haven or 134 Forbes Avenue, New Haven and therefore subject to the definition of Title V Source in accordance with Subparagraphs 22a-174-33(a)(10)(E & F) of the Regulations of Connecticut State Agencies (RCSA). Based on CTDEEP’s review of operations at the three (3) terminals, CTDEEP found that Buckeye’s terminal located at 85 East Street is neither “adjacent” nor “contiguous” to either of the other properties and therefore should not be aggregated with either of these properties for the purposes of Title V (see **Attachment 3**).

Question/Comment 5: Was there only one violation received from CTDEEP and how often does CTDEEP inspect the facility?

Buckeye Response to Question/Comment 5: Buckeye has not reported any deviations from the permit conditions in the Title V semi-annual monitoring reports or annual compliance certifications since Buckeye acquired the New Haven Forbes Terminal in 2020. The only violation that has been received for the facility is the March 2023 violation that is currently being addressed through this NSR permit application.

Based on the inspection frequency observed since Buckeye acquired the facility in 2020, CTDEEP performs air compliance inspections at the facility approximately every two (2) years.

Question/Comment 6: Does Buckeye use emission offsets for compliance at the terminal?

Buckeye Response to Question/Comment 6: The New Haven Forbes Terminal doesn't use any emission offsets to comply with its Title V permit limits. The emissions generated from operations at the terminal comply with the permitted limits and are reported annually to CTDEEP.

Question/Comment 7: How does the facility impact the health of the neighboring community? What is in those emissions and what does Buckeye think is a safe level?

Buckeye Response to Question/Comment 7: RCSA Sec. 22a-174-29 regulates emissions of hazardous air pollutants from a facility. Buckeye will complete the Maximum Allowable Stack Concentration (MASC) calculator associated with this regulation as part of the NSR permit application and will comply with the requirements of RCSA Sec. 22a-174-29. Typical hazardous air pollutants for a gasoline storage tank screened using the calculator are: benzene, ethylbenzene, toluene, n-hexane, xylene, cumene, and naphthalene. The calculator is a tool to ensure that hazardous air pollutant emissions do not exceed the Hazard Limiting Values set by the state of Connecticut.

Question/Comment 8: Can Buckeye explain ozone formation and its health impacts?

Buckeye Response to Question/Comment 8: Ozone precursors, such as the VOCs that are emitted from the facility, are managed by the USEPA and CTDEEP via permitting, air monitoring, and regulatory control technology requirements. It should be noted that ground level ozone is not emitted directly into the air but is created by chemical reactions between oxides of nitrogen (NOx) and VOCs. This happens when pollutants emitted by cars, power plants, industrial boilers, refineries, chemical plants, terminals and other sources chemically react in the presence of sunlight.

For more information on ozone, including the potential health effects of ozone, please see the EPA's website [Ground-level Ozone Pollution | US EPA](#) and CTDEEP's website for [Ozone Trends](#).

Question/Comment 9: What are PAHs?

Buckeye Response to Question/Comment 9: PAHs are polycyclic or polynuclear aromatic hydrocarbons.

Question/Comment 10: Does Buckeye feel that these facilities should smell?

Buckeye Response to Question/Comment 10: Prior to the meeting, Buckeye had not been made aware of ongoing odor complaints regarding the New Haven Forbes Terminal by residents, the New Haven Health Department, or CTDEEP. The emission sources at the facility are well-controlled and are not expected to cause offsite odor impacts during normal operations. The Buckeye New Haven facilities are staffed 24 hours per day, seven (7) days per week, and terminal operations personnel inspect the facilities daily as part of their normal operations, including evaluating them for possible odor sources. In addition, the terminal is subject to USEPA National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Gasoline Distribution facilities [40 Code of Federal Regulation (CFR) §63.11089], which requires Buckeye to do a formal monthly leak inspection of all equipment in gasoline service, including detection methods incorporating sight, sound, and smell. If any leaks are identified, Buckeye is required to make an initial attempt to repair them within five (5) days of discovery and complete any repairs within 15 days of discovery. Furthermore, Connecticut regulations RCSA §22a-174-23, “Control of Odors,” state that facilities cannot cause odors offsite of their property, and Buckeye is required to comply with this rule. This requirement is also a condition included in the facility’s air permit, and facility management must certify compliance with all conditions of the permit annually. If/when Buckeye receives an odor complaint from the community directly to facility personnel, Buckeye promptly investigates the complaint and responds accordingly.

New Haven residents who have odor concerns should report their concerns directly to the New Haven Health Department and CTDEEP. It is not the resident's responsibility to determine the source of the odor and try to contact businesses who may be the source of the odor, as this could potentially delay the investigation and resolution of the issue. Any odor issue needs to be investigated by professionals to determine the source and cause. Odor issues can be reported directly to the New Haven Health Department at 203-946-8174 or <https://seeclickfix.com/new-haven> or environmentalhealth@newhavenct.onmicrosoft.com, and the CTDEEP Air Complaint Line at 860-424-3436 or deep.aircomplaints@ct.gov.

Odor complaints for the City of New Haven for the past five (5) years provided by CTDEEP are listed in **Attachment 4**, none of which have involved a Buckeye-owned facility. Additionally, issues reported through SeeClickFix for the same time period do not include any reports of odor concerns from a Buckeye-owned facility.

Question/Comment 11: Commenter mentioned odor issues in the Wooster Square neighborhood requiring windows to be closed.

Buckeye Response to Question/Comment 11: Buckeye believes it is unlikely that the New Haven Forbes Terminal is the source of odors in the Fairhaven or Wooster Square neighborhoods given their distance from the facility. Please reference the response to Question/Comment 10 (above) regarding reporting mechanisms for odor concerns in this area.

Question/Comment 12: The New Haven Health Department should have been invited to this meeting.

Buckeye Response to Question/Comment 12: As noted in the Public Participation Plan, a certified mail notification of the meeting was sent to Maritza Bond of the New Haven Health Department. In an effort to improve participation in subsequent meetings, Buckeye will contact the New Haven Health Department directly and request their attendance.

Question/Comment 13: Does the facility do any fenceline monitoring now, or would they consider adding it?

Buckeye Response to Question/Comment 13: The facility does not currently have fenceline monitors installed. Fenceline monitoring is not required by state or federal regulation for petroleum terminals. Additionally, fenceline monitors have been deemed ineffective at distinguishing between emissions from the facility, other industrial facilities in the area, vehicle traffic on adjacent local roads/interstates, and non-local sources such as distant wildfires. If the above-listed challenges could be mitigated, Buckeye would consider adding a fenceline monitoring system. However, we believe a broader community-based monitoring system would be more effective to address residents' concerns related to air quality in New Haven.

Additionally, the USEPA recently updated regulations for the Gasoline Distribution Terminals (NSPS Subpart XXa, NESHAPS Subpart R and 6B) in May 2024 and determined that fenceline monitoring is not required because the USEPA had already strengthened other provisions which addressed the potential for equipment leaks and fugitive emissions. See the related excerpt of the EPA comment/response document in **Attachment 5**. The revised rules, which have compliance dates coming up in the next couple of years, will require instrument-based leak detection and repair per USEPA Method 21 or the use of optical gas imaging on a semi-annual routine basis. The facility will be subject to this requirement and will continue to comply with state and federal regulations.

Facility Operations, Equipment, and Emission Controls Questions

Question/Comment 14: How frequently are ships coming to the terminal to fill the tanks?

Buckeye Response to Question/Comment 14: The New Haven Forbes Terminal dock is no longer being utilized for product receipts or deliveries. Product is received via pipeline from the New Haven Waterfront Terminal dock.

Question/Comment 15: Does Buckeye transfer products from tanks on the other side of the harbor (east/west side)?

Buckeye Response to Question/Comment 15: Normal operating practice is to transfer product between facilities on the same side of the Harbor only, so the New Haven Forbes Terminal receives from, and transfers product to, the New Haven Waterfront Terminal.

Question/Comment 16: What are the controls on the Loading Rack and the installation date?

Buckeye Response to Question 16: Gasoline and distillate bottom loading of tanker trucks is controlled by a Vapor Combustion Unit (VCU) along with a Vapor Vacuum Collection System (VVCS), which eliminates fugitive emissions during the loading process. These controls were installed by the prior terminal owner in approximately 2006. See **Attachment 6** for a generalized process flow diagram depicting terminal operations from product receipt into tankage to product dispensed in trucks, along with the associated controls.

Question/Comment 17: What are the controls on the Internal Floating Roof Storage Tanks?

Buckeye Response to Question/Comment 17: Tanks 30M, 31M, and 32M are subject to USEPA's 40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced After July 23, 1984. This regulation specifies requirements for internal floating roofs, rim seals and controls on deck fittings. Tanks 30M,

31M, and 32M meet or exceed the regulatory required controls. Additionally, the tanks have both primary mechanical shoe seals as well as secondary wiper seals. See **Attachment 7** for an example drawing of a typical configuration of an internal floating roof tank and **Attachment 8** for an example of the primary mechanical shoe and rim mounted wiper secondary seals on these three tanks.

Question/Comment 18: Do other tanks besides the three (3) tanks being permitted have floating roofs?

Buckeye Response to Question/Comment 18: Yes, Tanks 20M, 21M, 22M, 23M, 24M, 27M, 28M, and 29M at the Buckeye New Haven Forbes Terminal are also internal floating roof tanks, and all of them also have primary and secondary rim seals.

Question/Comment 19: Frequency of Routine Monitoring of Equipment and Stormwater Discharges at the Terminal

Buckeye Response to Question/Comment 19: Buckeye completes routine facility monitoring on various frequencies. A list of the routine monitoring performed at the facility is provided in **Attachment 9a**. Stormwater discharge monitoring is also completed at various frequencies and a list of monitoring performed is provided in **Attachment 9b**.

Question/Comment 20: Reflectivity of Paint Used for Painting Tanks

Buckeye Response to Question/Comment 20: RCOSA 22a-174-20(a)(7) requires the tanks to be either mill-finished aluminum or painted and maintained white. The high solids polyurethane white paint Buckeye uses for external tank coatings has a Light Reflectance Value (LRV) of 86%. The color white is used to minimize emissions, and the high solids polyurethane paint has the best-in-class corrosion protection & coating performance, as indicated by its Society for Protective Coatings (SSPC) Paint 36 Level 3 performance.

Question/Comment 21: Controlling Emissions During Truck Deliveries at Retail Stations

Buckeye Response to Question/Comment 21: Buckeye does not own or operate trucking companies or retail stations, but our understanding is that after tank trucks fill at the terminal, they will travel to the retail station and connect to the vapor vent connection on the retail storage tanks when they deliver the product. As a result, the vapor that is displaced from the retail storage tanks during filling returns to the tank truck delivering the fuel, instead of being discharged directly into the atmosphere. The vapor on the tank trucks will then be displaced by the next load of product they pick up at the terminal, and that vapor will be directed to the terminal's vapor combustion unit for control. This control of VOC laden vapors from retail station gasoline tanks is a vital component of emissions control in the gasoline distribution supply chain, and is considered State I Vapor Recovery (more information about State I Vapor Recovery in Connecticut can be found here: [Gasoline Dispensing Facilities](#)). See **Attachment 10** for an example of the storage tank being filled at the retail station and vapors being recovered to the truck.

Question/Comment 22: What companies have access to the Buckeye pipeline? Does Buckeye own most of the pipelines in the harbor that other terminals use?

Buckeye Response to Question/Comment 22: Notably, the scope of Buckeye PT Terminals LP’s application exclusively contemplates its terminal located at 134 Forbes Avenue and not any pipelines owned or operated by Buckeye Pipe Line Company, L.P. or its affiliates. The foregoing notwithstanding, this question seeks confidential information (i.e., pipeline shipper identity and activity) which Buckeye Pipe Line Company, L.P. or its affiliates are prohibited from disclosing as a matter of law.

Buckeye is a common carrier pipeline that owns certain pipelines in and around the City of New Haven, including in the harbor. While Buckeye knows which lines we own and operate, we do not have knowledge or details related to the number of other liquid and/or gas pipelines within New Haven Harbor, and as a result, we cannot fully respond as to whether or not Buckeye “owns most of the pipelines in the harbor”. Additional information related to liquid and gas transmission pipelines regulated under the jurisdiction of the US Department of Transportation Pipeline and Hazardous Materials Safety Administration (PHMSA) can be found through The National Pipeline Mapping System ([NPMS – Home](#)) as well as by contacting the Connecticut Public Utilities Regulatory Authority (PURA).

Question/Comment 23: What Benefit Does the Facility Bring to the Community (e.g. Economic and Social benefits)

Buckeye Response to Question/Comment 23: Buckeye aims to have a meaningful and positive impact on every community in which we own and operate facilities. The Buckeye New Haven Forbes Terminal stores the critical gasoline, diesel, and kerosene that Buckeye’s customers supply to The City of New Haven and the surrounding communities. Residents and businesses in the greater New Haven area that directly or indirectly utilize any of the following, have likely used fuel that was sourced from this terminal for things such as:

- gasoline powered passenger vehicles including vehicles requiring premium gasoline
- diesel powered vehicles and trucks
- gasoline yard equipment (mowers/chain saws/snow blowers/trimmers)
- liquid fuel powered emergency generators
- home delivery services using gasoline/diesel powered vehicles (USPS, Amazon, UPS, FedEx, Uber, pizza delivery, any other delivery service)
- liquid fuel powered public transportation
- liquid fuel powered emergency vehicles
- marine vessels/boats powered by gasoline or diesel
- construction equipment and vehicles
- ate foods generated on traditional farms that used diesel powered tractors, harvesters, etc.
- used recreational vehicles such as ATVs, dirt bikes, personal watercraft, etc
- utilize heating oil or kerosene for a home heating system; or,
- drove on roads and parking lots cleared by diesel powered plows

In addition to the above transportation and/or economic benefits provided by fuel stored at the terminals, the facility provides employment for residents in the area via direct hires as well as trucking companies, construction/consulting companies, and third parties that provide services and supplies. As a landowner, we

supply a positive tax revenue for local government, while the fuel loaded at the terminal is taxed by the IRS and State of Connecticut. Furthermore, as stated in Buckeye's Response to Question/Comment 19, the vapor control device at the Buckeye terminal truck rack serves as the primary control of gasoline vapor emissions collected during filling of local retail station gasoline storage tanks, thereby improving air quality in and around each of those businesses. Additionally, Buckeye has partnered with the New Haven Fire Department to provide support needed to help keep the community safe. In 2022, Buckeye donated five (5) 55-gallon drums of green foam, and in 2024, we donated equipment for a changeout project (including pumps, hoses, foam tube, expansion tube, etc.) totaling approximately \$45,000.

Question/Comment 24: What is the percent of Market Revenues Buckeye generates from this facility and these three (3) tanks, for last three (3) years?

Buckeye Response to Question/Comment 24: Buckeye declines to respond to this question, as it is confidential information.

General Questions

Question/Comment 25: A commenter stated that Buckeye's 2024 Sustainability Report indicates the emissions of Buckeye have increased over the years, and spills have also increased.

Buckeye Response to Question/Comment 25: The Performance Data Table - Environmental Chart from 2024 Sustainability Report provides VOC Air Quality and Spills Data for the most current year as well as three (3) to five (5) prior years. It is important to note that the Air Quality data, specifically VOC emissions, for 2024 includes emission contributions from international (non-US regulated) locations for the first time, as noted in the footnotes. To provide a consistent baseline, the table has been annotated to show the emissions for 2024 in parentheses without the international locations. See **Attachment 11**. The updated chart shows that the emissions are generally in line with prior years; however, it should be noted that Buckeye's air emissions will fluctuate year over year based on facility throughput.

While the number of spills has fluctuated and was higher in 2024 than in other years, the volume spilled has generally decreased and the spill volumes in 2024 are the second lowest year of the five (5) years of data presented.

Question/Comment 26: What Does It Mean When Buckeye Says Net Zero for Greenhouse Gas (GHG) Emissions?

Buckeye Response to Question/Comment 26: Buckeye's net zero goal is based on plans to reduce scope 1 and 2 GHG emissions from a 2019 baseline through efficiency improvements, low-carbon energy adoption, and high-quality carbon credits. "Net" emissions include market-based scope 2 reductions via retirement of renewable energy certificates (RECs) and offsets for hard-to-abate scope 1 emissions using verified credits.

Question/Comment 27: For the \$45,000 donation to the New Haven Fire Department, what equipment specifically was donated? Was training provided?

Buckeye Response to Question/Comment 27:

Buckeye donated five (5) 55-gallon drums of green fire-fighting foam in 2022. Additionally, in 2024, Buckeye donated the following items, the value of which totaled approximately \$45,000:

- Two of Model HCOWFHC-10764 Williams WATP 1,500 GPM Portable Around The Pump, includes 2” Stingers and Interconnecting Hose, paint red finish.
- Two of Model HCOWFHC-15468 Williams WPRV Pressure Reducing Valve WPRV, handle style, 5” storz inlet and outlet
- One of Model HCOAKB-5160 Akron Brass Akromatic, automatic 250-1,250 GPM, built in stream shaper, rated at 80 PSI operating pressure, 2.5” (F)NST inlet.
- One of Model HCOAKB-737 Akron Brass Akromatic, 1,250 GPM Foam Tube.
- Two of Model HCOELK-03996101 Elkhart Brass 1,250 GPM Foam Expansion Tube.

Buckeye has offered in-person training to the New Haven Fire Department, but no training has been requested to date.

Question/Comment 28: How is Buckeye planning for Climate Resiliency – including planning for sea level rise and facility siting/moving, anything specific to New Haven facilities?

Buckeye Response to Question/Comment 28: Buckeye conducted preliminary physical risk evaluations in 2024 using climate-related data and scenarios available about current and future conditions. Risks identified for the New Haven facilities included product release (spills), fire, and employee safety concerns due to strong winds, hurricanes, flooding, and extreme temperature events. Buckeye currently has plans and procedures to mitigate these risks, and we will continue to monitor and update the physical risk evaluations in the future to identify opportunities to enhance climate resiliency measures. There are currently no plans to relocate the facilities that Buckeye owns in New Haven.

Question/Comment 29: Commenters requested additional opportunities for dialogue before the tentative determination is issued.

Buckeye Response to Question/Comment 29: Buckeye will schedule a follow-up meeting with interested parties at a mutually agreeable place and time, once commenters have a chance to review Buckeye’s responses herein.

Questions/comments received via electronic mail and/or regular mail are listed below. The community question/comment is listed first, followed by Buckeye's response to the question/comment.

Questions/Comments Received Via Electronic Mail and Regular Mail

Buckeye did not receive any questions/comments via electronic mail or regular mail

Questions/comments received via return postcard from mailing sent to addresses within ½-mile radius of the facility are listed below. The community question/comment is listed first, followed by Buckeye’s response to the question/comment.

Questions/Comments Received via Return Postcard

Return Postcard Question/Comment 1: “Nothing more valuable than progress.”

Buckeye Response Return Postcard Question/Comment 1: Thank you for your comment; no response required for this statement.

Return Postcard Question/Comment 2: “I allow they to come in if I’m not home to put it in the apartment.”

Buckeye Response Return Postcard Question/Comment 2: Thank you for your comment; no response required for this statement.

Attachment 1

New Haven Forbes Terminal Permitted Emissions and Throughput Summary

New Haven Forbes Terminal – Permit Summary

Permit Number: 117-0270-TV
 Permit Expiration Date: April 29, 2021 (timely renewal application submitted, operating under Application Shield)
 Renewal Application Due: April 29, 2020

Throughput Limits	MMGal/12 mo	Control Device Limits
Truck Rack Gasoline/Ethanol:	417.5*	Min. VCU Combustion Temp: 200°F
Truck Rack Distillate:		
Controlled (Two bays)	525.6	
Uncontrolled (One Bay)	61.32	
Marine Barge Distillate:	105	

*As part of 417.5 MMgal/yr maximum loading throughput, the Permittee is allowed to load a maximum of 4.175 MMgal/yr of gasoline during Vapor Vacuum Collection System (VVCS) downtime.

Emission Limits		mg/L	TPY
Gasoline Loading, VOC:	VCU	10	17.42
	Fugitive	8	0.14
	Total		17.56
Distillate Loading, VOC:	Vapor Balance Service**		0.35
	Splash Loading: Normal Service		0.93
	Total		1.27
Truck Equipment Leak, VOC:		0.035 lb/hr	0.15
Marine Barge Loading, VOC:		1.91 lb/hr	0.68
	Equipment Leak	0.003 lb/hr	0.01
	Total	1.91 lb/hr	0.69
Gasoline/Distillate Loading, Marine Barge Loading & Fugitive Emissions, VOC			19.67
Gasoline Loading, NOx		4.0	6.97
Distillate Loading, NOx		4.0	8.77
Gasoline/Distillate Loading, Marine Barge Loading & Fugitive Emissions, NOx			15.74
Gasoline Loading, CO		10	17.42
Distillate Loading, CO		10	21.93
Gasoline/Distillate Loading, Marine Barge Loading & Fugitive Emissions, CO			39.35

** The VOC emissions for vapor balance service include 0.07 TPY for rack fugitive VOC emissions.
 - VVCS to be used when loading into gas cargo tank

Gasoline/Distillate Loading, Marine Barge Loading & Fugitive Emissions - HAP Emission Limits

HAP	Maximum Allowable Stack Concentration (ug/m3)
Hexane	11500
Benzene	478
Toluene	23900
Ethylbenzene	27700
Xylene	27700
Cumene	15600

Boiler (insignificant source)

Heating Oil Sulfur Content	15 ppm
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Attachment 2

New Haven Forbes Terminal Summary of Reported VOC Emissions for 2022, 2023, and 2024

**Buckeye New Haven Forbes Terminal
Reported VOC Emissions in Annual Emission Inventories**

Source	2022 VOC Emissions (tpy)	2023 VOC Emissions (tpy)	2024 VOC Emissions (tpy)
Total Floating Roof Tanks	23.407	22.009	27.977
Tank 30M	0.016	2.289	3.759
Tank 31M	0.051	1.535	2.056
Tank 32M	0.028	0.236	2.523
Total Fixed Roof Tanks	1.075	1.136	1.262
Truck Loading Emissions	2.146	2.759	2.798
Equipment Fugitives	0.352	0.352	0.352
Other	0.003	0.001	0.001
Facility Wide Emissions	26.983	26.257	32.389
Loading Rack Throughput All Products (thousand gallons)	153,345	167,373	169,756

Gasoline to Distillate Storage Transition During Reporting Period

30M Last month storing distillate was February 2023, First month storing Gasoline was July 2023

31M Last month storing distillate was November 2022, First month storing Gasoline was May 2023

32M Last month storing distillate was July 2023, First month storing Gasoline was April 2024

Attachment 3

CTDEEP Buckeye New Haven Terminals Source Aggregation Decision



June 1, 2023

Mr. Stephen Wing
Senior Operations Manager
Buckeye PT Terminal LP
The Buckeye Building
6161 Hamilton Blvd.
Allentown, PA 18106

Response to Request for Information in Source Aggregation Evaluation for New Haven and East Haven Facilities

Dear Mr. Wing:

On March 27, 2023, The Department received Buckeye PT Terminals LP's (Buckeye) response to the Department's information request dated March 9, 2023. The Department requested information regarding the operations of facilities located in New Haven and East Haven owned and operated by Buckeye, its affiliates, and assigns. The purpose of the request was to determine if the property located at 85 East Street, New Haven is "adjacent" or "contiguous" to either the property located at 280 Waterfront Street, New Haven or 134 Forbes Avenue, New Haven and therefore subject to the definition of Title V Source in accordance with Subparagraphs 22a-174-33(a)(10)(E & F) of the Regulations of Connecticut State Agencies (RCSA).

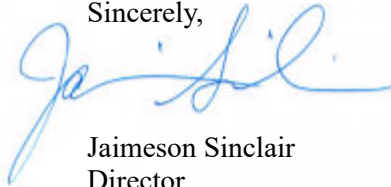
The Department reviewed Buckeye's March 27, 2023, submission, Buckeye's pending Title V Permit applications and Department records for the current and historic operations of each of the properties located at 85 East Street, 280 Waterfront Street, and 134 Forbes Avenue. Based on the information provided by Buckeye regarding current operations and Department records of historic operations at these three properties, DEEP finds that 85 East Street is neither "adjacent" nor "contiguous" to either of the other properties and therefore should not be aggregated with either of these properties for the purposes of Title V. Consequently, the equipment and operations occurring at 85 East Street do not need to be included in either of the Title V Operating Permits pending before the Department at this time.

Stephen Wing
Jaimeson Sinclair
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This determination is based on information provided by Buckeye and is specific to aggregating 85 East Street with either 280 Waterfront Street or 134 Forbes Avenue. The discovery of facts to the contrary may result in a revised determination. Further, this determination should not be construed to assert that 85 East Street is not, in and of itself, a Title V Source under Subsection 22a-174-33(a)(10) of the RCSA.

Should you have questions regarding this correspondence, please don't hesitate to contact me at jaimeson.sinclair@ct.gov.

Sincerely,



Jaimeson Sinclair
Director
Engineering Division
Bureau of Air Management

Attachment 4

City of New Haven Odor Complaints for the Last 5 Years from CTDEEP Records

Odor Complaints City of New Haven for the Last 5 Years from CTDEEP Records

SOURCE:	LOG NUMBER:	ADDRESS:	LOG TYPE	INSP DATE:
AREA OF 169 EAST STREET	2019-0100	AREA OF 169 EAST STREET	C	06/21/2019
A1 TOYOTA	2019-0150	50 AMITY ROAD	C	05/31/2019
MILFORD BARREL COMPANY	2019-0368	100 WARWICK STREET	C	12/05/2019
FACTORY IN TEMPLE PLAZE	2020-0072	170 TEMPLE STREET	C	07/07/2020
AREA OF ORANGE STREET	2020-0160	AREA OF ORANGE STREET	C	09/26/2022
AUTOBODY SHOP	2021-0049	140 PECK STREET	C	03/30/2021
AREA OF HUNTINGTON ROAD	2021-0056	HUNTINGTON ROAD	C	04/15/2021
BRIAN WNEK	2022-0075	HEALTH DEPT. OF NEW HAVEN	C	04/12/2022
NEW HAVEN TERMINALS	2022-0200	CORNER OF WATER AND EAST STREETS	C	11/27/2023
NEW HAVEN SEWAGE PLANT	2023-0110	345 EAST SHORE PARKWAY	C	08/24/2023
Milford Barrel	2024-0014	100 Warwick St	C	08/02/2024
A-1 Toyota	2024-0075	50 Amity Road	C	05/16/2024
Laydon Industries	2024-0114	539 Grand Avenue	C	07/03/2024

Source: Information provided by CTDEEP

Attachment 5

Excerpt from EPA's NESHAPs for Gasoline Distribution Facilities and NSPS for Bulk Gasoline Terminals
Comment Response Document

Excerpt from:

**National Emission Standards for Hazardous Air Pollutants for Gasoline Distribution
Facilities and New Source Performance Standards for Bulk Gasoline Terminals**

Background Information for Final Amendments

Summary of Public Comments and Responses

January 2024

pages 43-45

6.4 Fenceline/ Advanced Monitoring Alternatives

Comment 1: Commenters recommended the EPA include requirements for fenceline monitoring. According to a commenter, fenceline monitoring is clearly a “development” for hydrocarbon emissions and sources at gasoline distribution facilities based on technology reviews conducted for petroleum refineries, organic liquids distribution facilities, and ethylene production facilities, and not considering it as a development for gasoline distribution facilities would be arbitrary and capricious. The commenter recommended requiring facilities to use Method 325A/B for all VOCs and HAP for which the method is parameterized, to set corrective action limits to ensure compliance with the proposed standards and to ensure health reference standards (including Cal EPA values) are not exceeded, to limit the number of corrective action cycles, and to continue monitoring without any “step-down provisions.” Further, the commenter recommended that the EPA consider additional developments in real-time, open-path monitoring for this source category.

On the other hand, another commenter stated that fenceline monitoring has not been demonstrated as a technologically viable means of detecting leaks at gasoline distribution terminals, or as a viable alternative to the AVO leak detection methods already in place (or for the proposed instrument monitoring). Since fenceline monitoring would not replace existing LDAR requirements, it would simply increase monitoring costs, while providing limited to no emission reductions. The commenter also noted that gasoline distribution facilities are small geographically and often located near other industrial sources, which would make fenceline monitoring an unreliable indicator of fugitive emissions from the gasoline distribution facility.

Response 1: The EPA has previously employed fenceline monitoring (for benzene as a surrogate for HAP emissions from fugitive sources) as part of a work practice standard for petroleum refineries, promulgated as part of the technology review for the source category (40 CFR part 63, subpart CC), to monitor and manage fugitive emissions as well as aiding in the monitoring of the sector's ground-level emission points (e.g., storage tanks, wastewater collection systems, equipment leaks). This type of monitoring is performed at multiple points located at the edge of a facility's property line, commonly known as the “fenceline,” and the results of this monitoring are used to calculate a long-term average (e.g., annual rolling average) of a pollutant concentration at the boundary. If this long-term average exceeds an “action-level,” then a facility is required to conduct the associated work practices (i.e., root cause and corrective action) to identify and mitigate the source of the excess emissions. The “action-level” was set at a level reflecting full compliance with the emissions standards for the emission points described above and at a concentration in

which there was a robust measurement method (*i.e.*, EPA Method 325B) for measuring benzene at and well below the action-level. This level was based on the highest modeled impact from the petroleum refinery sector at the fenceline using the emission inventories and dispersion modeling.

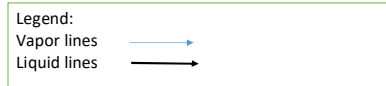
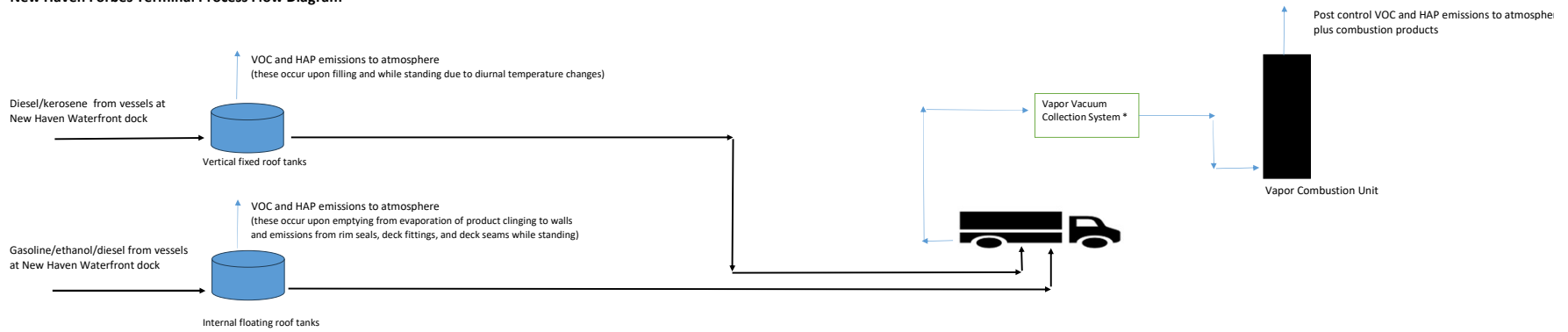
We did not propose to include fenceline monitoring as part of the equipment leak or fugitive emissions control options for the source categories addressed in these rules. Generally, fenceline monitoring can be an effective tool for addressing fugitive or ground level releases when such emissions are significant, or where we have identified considerable uncertainties in HAP emissions estimates from fugitive emission sources, but it is not an appropriate tool in all situations. As explained below, we concluded that the fenceline monitoring requirements as set out in the NESHAP for petroleum refineries is not a necessary requirement for these source categories at this time. Because there are a number of petroleum refineries that are co-located with bulk gasoline terminals, monitoring data exist for co-located petroleum refinery and gasoline terminal operations that helped to inform our decision. In short, in our experience with the petroleum refinery fenceline monitoring program, equipment and loading operations in gasoline service do not appear to be the sources that cause elevated benzene concentration above the action level set in the petroleum refinery rule. As a result, we do not believe that fenceline monitoring would measure significant benzene emissions from these source categories. We also note that these source categories are different from the petroleum refineries source category in terms of the size and number of sources. We estimate there are over 9,000 area source gasoline distribution facilities. We would need emissions information from these facilities to establish an action level, which would require considerable resources. Also, many of the area source gasoline distribution facilities are in remote areas with limited staff which would increase the costs to conduct fenceline monitoring. Finally, we are addressing the potential for equipment leaks and fugitive emissions from the sources in these source categories by strengthening a number of requirements. The current rules require AVO monitoring. We proposed and are finalizing additional controls for equipment leak and fugitive emissions sources. In NSPS subpart XXa, we are finalizing that bulk gasoline terminals must conduct quarterly instrument monitoring using EPA Method 21 or OGI. In NESHAP subpart R, we are finalizing that major source gasoline distribution facilities must conduct semiannual instrument monitoring using EPA Method 21 or OGI. In NESHAP subpart 6B, we are finalizing that area source gasoline distribution facilities must conduct annual instrument monitoring. In addition, we are finalizing that gasoline distribution facilities must repair, record, and report any leaks identified by AVO during normal duties. For all of these reasons, after considering the comments and the particular facts for these

source categories, we conclude that it is not necessary to require fence-line monitoring as part of these technology reviews and NSPS review.

Attachment 6

New Haven Forbes Terminal General Process Flow Diagram

New Haven Forbes Terminal Process Flow Diagram

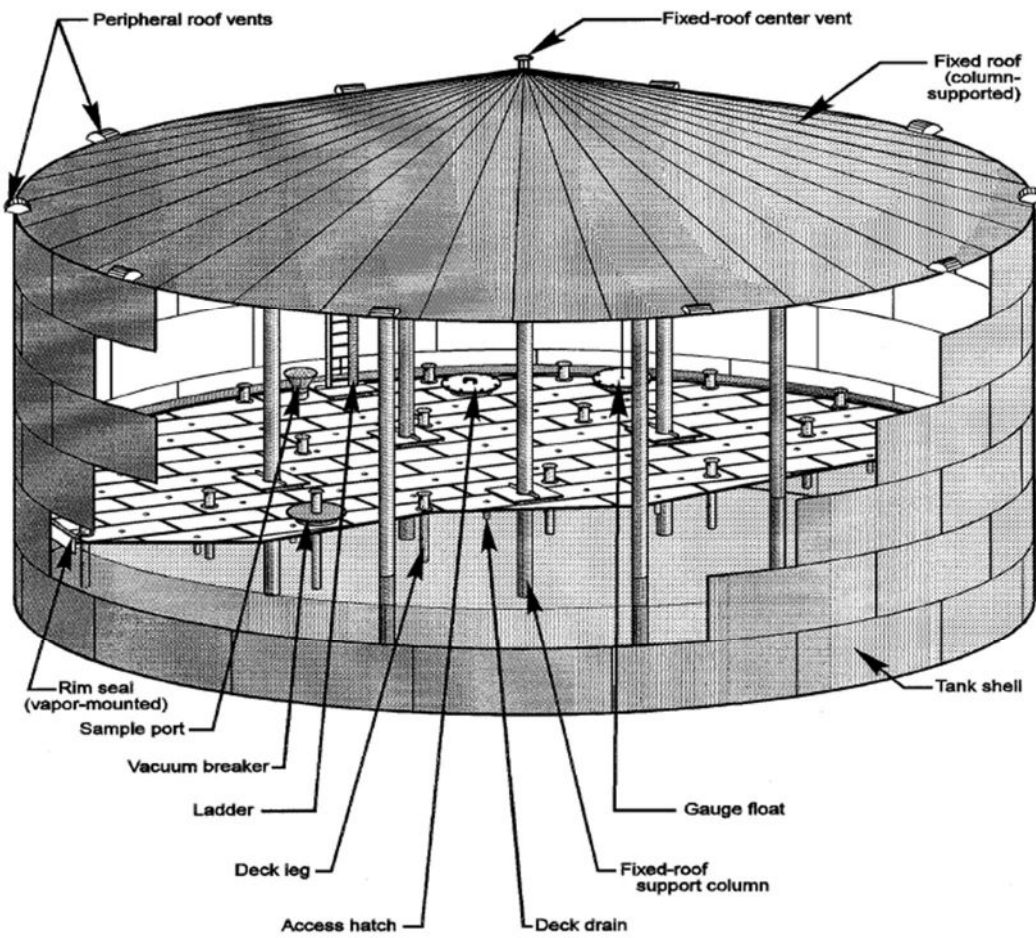


* Vapor Vacuum Collection System eliminates all fugitive emissions from truck loading.

Attachment 7

Typical Internal Floating Roof Tank Configuration

Typical Internal Floating Roof Configuration on Internal Floating Roof Tanks



See Attachment 8 for the drawing of rim seals typical of those on New Haven Forbes Terminal Tanks 30M, 31M, and 32M

Source: EPA AP-42 Chapter 7.1 Organic Liquid Storage Tanks Figure 7.1-4

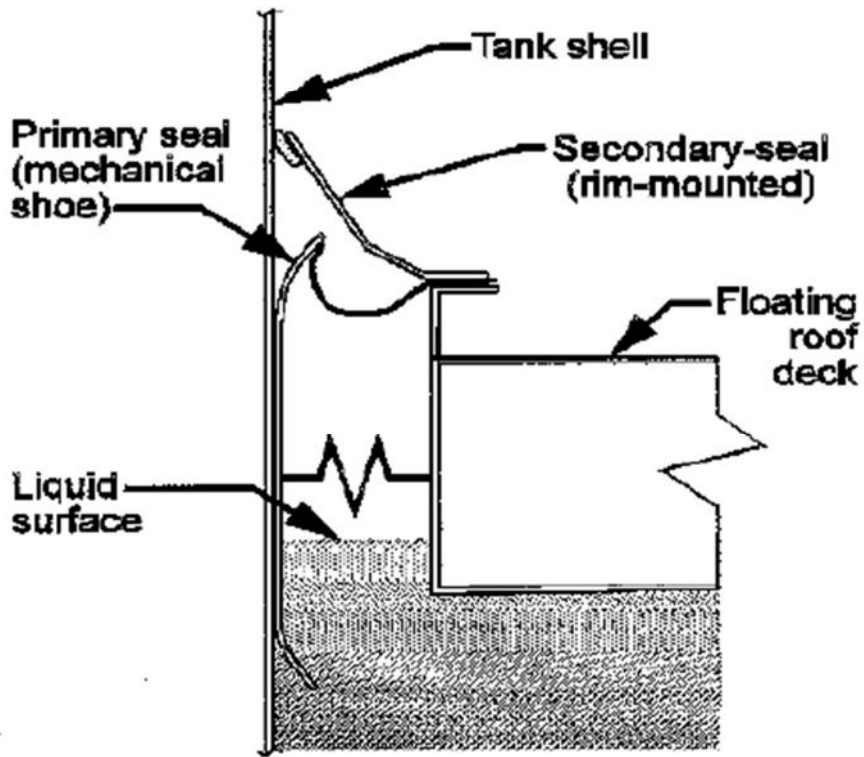
Attachment 8

Typical Internal Floating Roof Primary and Secondary Rim Seals

(representative of seals currently installed on Tanks 30M, 31M, and 32M)

Typical Configuration of Primary and Secondary Rim Seals on Internal Floating Roof Tanks

**Rim-mounted secondary seal
over
mechanical-shoe primary seal**



Representative of the seals currently installed at the New Haven Forbes Terminal on Tanks 30M, 31M, and 32M

Source: EPA AP-42 Chapter 7.1 Organic Liquid Storage Tanks Figure 7.1-8

Attachment 9a

New Haven Forbes Terminal Summary of Routine Monitoring

New Haven Forbes Terminal – Routine Monitoring

Daily/Continuous

- Complete Daily Facility Inspection checklist for the entire facility
- Complete Daily Vapor Combustion Unit checklist
- Continuously monitor temperature of the Vapor Combustion Unit by continuous monitoring system
- Monitor pressure at each vacuum controlled bay and also before or after the Vapor Vacuum Collection System (VVCS)
- Maintain records of products stored and product movements
- Log all rack throughput and have a daily record available for inspection
- Obtain vapor tightness certification for each tank truck which is to be loaded. Record tank truck's ID number as each truck is loaded at rack.
- Monitor the period of time during which the Vapor Vacuum Collection System (VVCS) is not in operation, if any. Record the throughput through each bay during this time.

Monthly

- Conduct external visual inspection on all storage tanks
- Conduct visual inspection "Through the Hatch" on all floating roof tanks - floating roof deck, deck fittings and rim seal system
- Conduct Monthly "Sight, Sound, Smell" check for all equipment in gasoline service. Each piece of equipment shall be inspected during loading of gas cargo tanks. If leaks are detected, attempt repairs within 5 days and complete repairs within 15 days.

Annually

- IFRs: Conduct "Through the Hatch" Seal Inspections annually for NESHAPS Subpart R, but CT DEEP requires the same inspection monthly.

Every Five Years

- Conduct Vapor Combustion Unit Stack Test: Once every 5 years (last done in January 2021, next due January 2026)

Every Ten Years

- Conduct Up Close Seal Inspection of the floating roofs on all Internal Floating Roof Tanks at least once every 10 years (or each time the tank is emptied and degassed if sooner than 10 years).

Other

- Conduct internal tank corrosion inspections on all storage tanks based on recommended frequency.

Attachment 9b

New Haven Forbes Terminal Summary of Routine Monitoring for Stormwater and Recent Sample Results

Buckeye New Haven Forbes Terminal – Stormwater Monitoring

Stormwater is managed at the New Haven Forbes Terminal in accordance with the CTDEEP Industrial General Industrial Stormwater permit. On October 1, 2025, the CTDEEP issued a revised Industrial General Stormwater Permit. Under the new permit, all permittees will submit their stormwater sampling results to an online portal. The data will be available to the public through the CTDEEP portal.

As required by the CTDEEP stormwater permit, the stormwater undergoes a visual inspection using a clear glass jar on a quarterly basis. In addition, the stormwater is tested in a laboratory for the following parameters at the designated frequency:

Parameter	Monitoring Frequency
Chemical Oxygen Demand (COD)	Semiannual
Total Oil and Grease (O&G)	Semiannual
pH	Semiannual
Total Suspended Solids (TSS)	Semiannual
Total Phosphorus (TP)	Semiannual
Total Kjeldahl Nitrogen (TKN)	Semiannual
Nitrate as Nitrogen (NO ₃ -N)	Semiannual
Total Copper (Cu)	Semiannual
Total Lead (Pb)	Semiannual
Total Zinc (Zn)	Semiannual
AQUATIC TOXICITY	Once per Permit Term
Enterococcus bacteria MPN \ 100mls	Annual
E. Coli bacteria MPN \ 100mls	Annual

Attachment 10

Example of Vapor Balance Loading at Retail Service Station

Typical Vapor Balance Loading Diagram - Truck Delivering to Tank at Retail Station

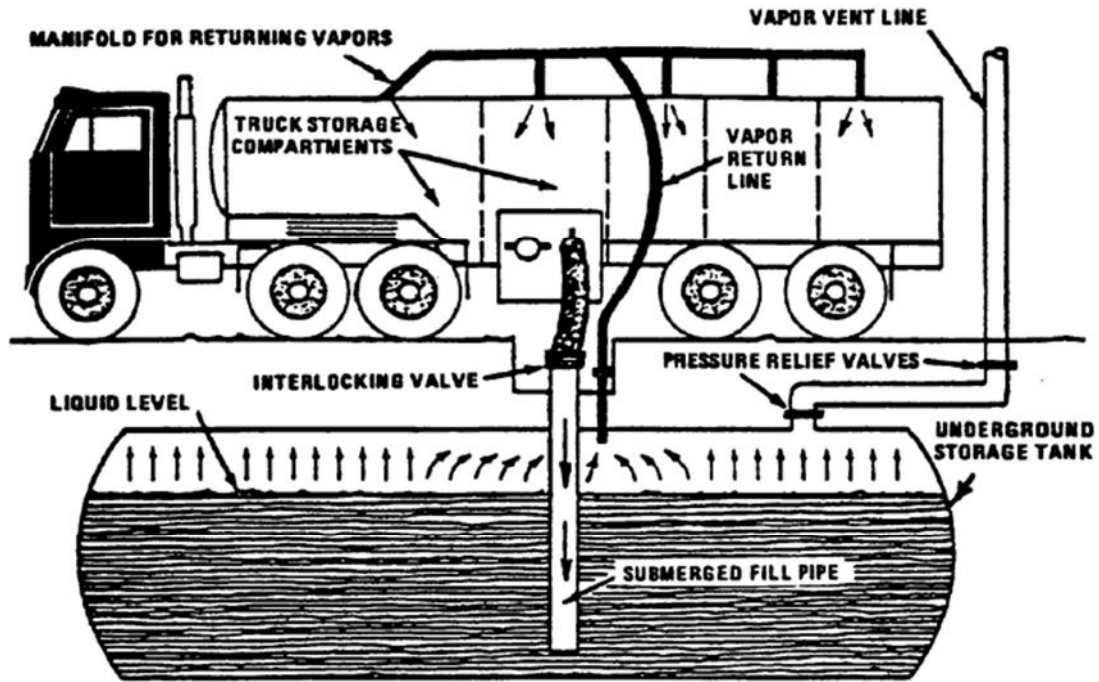


Figure 5.2-5. Tank truck unloading into a service station underground storage tank and practicing "vapor balance" form of emission control.

Attachment 11

Buckeye 2024 Sustainability Report Performance Data Table Annotated

PERFORMANCE DATA TABLE

The performance data tables, and the data provided therein, are provided for informational purposes only. Where otherwise noted, data and information reflect an annual (January 1st - December 31st) collection period. Buckeye disclaims any representation or warranty as to the data's accuracy or completeness, which may inadvertently contain inaccurate, misleading, and incomplete statements despite our good faith efforts. We are under no duty to modify, change, correct, delete, or update these tables and data disclosures but reserve the right to do so at our sole discretion without notice. There are inherent limitations to the accuracy of some kinds of environmental, safety, and social performance data. The data may not be interpreted as any form of guarantee or assurance of future results or trends.

Environment	Units	2020	2021	2022	2023	2024
Greenhouse Gas Emissions (Equity) ^{[1][2]}						
Gross Scope 1 emissions	Thousand MT CO2e	218	231	229	247	227
Percentage Methane ^[3]	Percentage (%)	-	-	-	2%	3%
Percentage covered under emissions-limiting regulations	Percentage (%)				0%	0%
Location Based: Energy indirect (Scope 2) GHG emissions^[4]						
Purchased renewable electricity	Thousand MWh	-	-	56	67	68
Purchased other (Biomass, Nuclear, Unknown)	Thousand MWh	-	-	125	132	127
Purchased coal	Thousand MWh	-	-	126	119	89
Purchased non-renewable electricity	Thousand MWh	-	-	324	346	329
Total energy purchased	Percentage (%)	100%	100%	100%	100%	100%
Total renewable electricity purchased	Percentage (%)	-	-	11%	12%	13%
Market Based: Energy indirect (Scope 2) GHG emissions^[5]						
Purchased renewable electricity	Thousand MWh	-	-	-	620	563
Purchased other (Biomass, Nuclear, Unknown)	Thousand MWh	-	-	-	0	0

Environment	Units	2020	2021	2022	2023	2024
Purchased coal	Thousand MWh	-	-	-	0	0
Purchased non-renewable electricity	Thousand MWh	-	-	-	0	0
Total energy purchased	Percentage (%)	-	-	-	49%	77%
Total renewable electricity purchased	Percentage (%)	-	-	-	100%	100%
Scope 3 Emissions	Thousand MT CO2e	-	-	-	-	10,075
Indirect Biogenic Emissions	Thousand MT CO2	-	-	-	-	262
Air Quality^[6]	(2024 Emissions excluding international locations are in parentheses, international locations not included in prior year's emissions totals)					
Air emissions: Nitrogen oxides (NOx)	Thousand kg	-	-	106	115	121 (120)
Air emissions: Sulfur oxides (SOx)	Thousand kg	-	-	2.3	1.6	2.9 (2.9)
Air Emissions: Carbon monoxide (CO)	Thousand kg	-	-	-	-	189.0 (182)
Air emissions: Volatile organic compounds (VOCs)	Thousand kg	-	-	3,346	3,198	8,364 (3,311)
Air emissions: Particulate matter (PM 2.5)	Thousand kg	-	-	12	15	12 (12)
Air emissions: Particulate matter (PM10)	Thousand kg	-	-	15	17	14 (14)
Air emissions: Ozone (O3)	kg	-	-	0	0	0 (0)
Air emissions: Lead (Pb)	kg	-	-	<1	<1	<1 (<1)
Air emissions: Mercury (Hg)	kg	-	-	<1	<1	<1 (<1)
Air emissions: Ozone-depleting substances (ODS)	kg	-	-	0	0	0 (0)
Air emissions: Hazardous Air Pollutants (HAPs)	Thousand kg	-	-	124	119	187 (118)
Non-compliances ^[7]	#	-	6	7	8	4
Spills						
Number of releases ^[8]	#	14	18	7	13	18
Aggregate release volume ^[9]	Barrels	310	604	194	151	178

Environment	Units	2020	2021	2022	2023	2024
Volume of hydrocarbon releases in the Arctic		0	0	0	0	0
Volume of hydrocarbon releases in Unusually Sensitive Areas (USAs) ^[10] (defined by nat. pipeline mapping system)	Barrels	0	353	0	0	0
Aggregate volume recovered ^[11]	Barrels	233	321	188	102	124
Energy Management (Equity)						
Total energy consumed ^[12]	Thousand Gigajoules (GJ)	1,688	1,776	1,824	1,962	1,888
Percentage grid electricity	Percentage (%)	100%	100%	100%	100%	100%
Percentage renewable (Location-based)	Percentage (%)	-	-	11%	12%	13%
Percentage renewable (Market-based)	Percentage (%)	-	-	-	100%	100%
Energy Intensity	GJ/1000 BOE	-	-	-	-	1.36
Reduction of energy consumption ^[13]	Percentage (%)	-	-	8%	2%	5%
Waste Management^[14]						
Re-Use/Recycle	Tons	-	24,386	20,380	25,965	27,470
Other	Tons	-	-	-	-	735
Incineration	Tons	-	406	154	194	283
Landfill	Tons	-	18,147	14,834	13,102	14,860
Total waste disposed	Tons	-	42,939	36,215	39,514	43,348
Total diverted from landfill/incineration	Percentage (%)	-	57%	59%	68%	63%
Ecological Impacts						
Wildlife fatalities ^[15]	#	0	0	0	0	0
T&E species fatalities ^[16]	#	0	0	0	0	0
Percentage of land owned, leased, and/or operated within areas of protected conservation status or endangered species habitat ^[17]	Percentage (%)	-	-	6%	6%	6%

Environment	Units	2020	2021	2022	2023	2024
Terrestrial acreage disturbed	Acres (ac)	-	-	-	3.7	3.7
Percentage of impacted area restored	Percentage (%)	-	-	-	100%	100%
Activity Metric						
Total pipeline throughput	Thousand Barrels/Day	-	-	-	1,170	1,181

[1] GHG emissions were measured, calculated, or estimated utilizing methods from the GHG Protocol Corporate Standard with emissions factors as defined by the EPA and other sources. Emissions from Freeport LNG excluded due to data availability.

[2] GHG emissions data, including baseline year (2019-2024) have been restated to reflect the adoption of the equity share approach, as defined by the Greenhouse Gas Protocol. In prior years, we were reporting using the financial control approach, which can be found as an alternative methodology further below.

[3] Direct methane emissions not associated with combustion by-product.

[4] The location-based method considers the average emission factors of the public electricity grid.

[5] The market-based method considers retired and purchased renewable energy certificates (RECs) applied towards the annual Scope 2 emissions equivalent and is based on equity share.

[6] Air emissions were measured, calculated and reported in accordance with SASB and GRI. St Lucia and Bahamas facilities were not historically included. In 2024 emissions from these facilities have been calculated and will be included going forward.

[7] Data for 2024 indicates the number of Notices of Violation (NOVs) and/or Notice of Non-Compliance (NOCs) received from an agency within the calendar year of 2024, however three occurred within 2024 and the remaining NOV is historical.

[8] Higher consequence releases only, including releases beyond secondary containment which are: i) Greater than Five (5) Barrels of Liquid or 500 Pounds of LPGs released outside secondary containment; ii) Evacuation, Ignition, or Explosion; iii) Wildlife Impact, Water Contamination (Surface, or subsurface); iv) Public/Non-Operator Property Damage. LPG release(s) have been converted to barrels of oil equivalent using API 42, Appendix A conversion factor.

[9] Volume of reportable releases is reported in accordance to EIC guidance and definitions, including only reportable releases that are beyond secondary containment and greater than 5 barrels.

[10] Unusually sensitive areas are identified using the National Pipeline Mapping System in accordance with the Code of Federal Regulations, title 49 § 195.52.

[11] Volume of spills recovered is calculated and reported following the SASB standards, considering the amount of hydrocarbons removed from the environment through short-term spill response activities. This excludes amounts that were recovered during longer-term remediation at spill sites and amounts evaporated, burned or dispersed.

[12] Total energy figure represents energy consumption from electricity across Buckeye's operations and assets under the specified boundary.

[13] Reduction calculation methodology was refined to be based on actual electricity usages compared to baseline year 2019, not including acquisitions or divestitures occurring in the time period. Data from 2022 and 2023 has been adjusted to reflect changes in methodology.

[14] Excludes waste volumes managed on-site at Bahamas and St. Lucia terminals. Other category includes deepwell, fuel blending, and wastewater treatment volumes. Incineration category includes waste-to-energy volumes. Landfill category includes solidification and stabilization volumes.

[15] Wildlife as defined by Code of Federal Regulations, Title 50

[16] T&E Species as defined by Code of Federal Regulations, Title 50 § 17

[17] Percentage includes aboveground facilities and pipeline rights-of-way assumed to be 100 ft wide within 5 km of an area that is protected conservation or endangered species habitat as defined by UNESCO World Heritage. Our accounting for assets near protected areas was updated in 2024 to include our pipeline rights-of-way.

Attachment 12

Public Notice for Meeting – Print Advertisements

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PUBLIC NOTICES

CITY OF NEW HAVEN, CONNECTICUT - REQUEST FOR PROPOSAL

Reentry Employment Services for Returning Citizens Solicitation ID: 2025-RFP-264

Pre-Proposal Meeting, Monday September 15, 2025, see portal for details

RFP due date: Tuesday September 30, 2025, at 11:00 AM EST.

RFP can be downloaded at <https://procurement.opengov.com/portal/newhavenct>

Malinda Figueroa
Purchasing Agent

LEGAL NOTICE

Request for Proposal (RFP) 2026-0904 Health Access Program

The Department is seeking proposals for two (2) organizations to implement the Health Access Program, a program to increase access to specialty medical care and services for low-income children and/or adults who are underinsured or uninsured in Connecticut. The selected Proposer will: 1) provide patient navigation for eligible patients; 2) develop a network of specialty providers and health care facilities to supply donated care and ancillary services, and 3) provide social service assistance and address Social Determinants of Health and barriers to accessing health care. An anticipated total of up to \$1,244,634 of state funding is expected to be available to support this opportunity. Funding is estimated from July 1, 2026 through June 30, 2029 and is subject to availability and satisfactory performance. The RFP is available in electronic format on the DPH website at <http://www.ct.gov/dph/rfp> OR on the State Contracting Portal at <https://portal.ct.gov/DAS/CTS/Source/BidBoard>. A printed copy of the RFP can be obtained from the Official Contact upon request. Jennifer Squires, 410 Capitol Avenue, MS#11MAT, Hartford, CT 06134, phone: 860-509-7412, email: jennifer.squires@ct.gov. Deadline for submission of proposals is 10/27/25 by 12:00pm EST.

PUBLIC INFORMATIONAL MEETING ANNOUNCEMENT

Buckeye New Haven Forbes Terminal

OPEN TO THE GENERAL PUBLIC

AN INFORMATIONAL MEETING REGARDING:
Buckeye is planning to submit an air permit application to the Connecticut Department of Energy and Environmental Protection to permit three existing bulk storage tanks (Tanks 30M, 31M, and 32M) at the New Haven Forbes Terminal; the terminal is located at 134 Forbes Avenue, New Haven, CT 06512. No physical or operational changes at the facility are planned as part of this permitting activity. The storage tanks will continue to operate state of the art emission controls as authorized by the facility's current Title V air quality operating permit. A map of the area is attached.

WILL BE HELD AT: New Haven City Hall, 165 Church St, New Haven, CT in Meeting Rooms 1 & 2

ON: Tuesday, October 7, 2025 from 6-8 pm

PRIOR TO THE MEETING, INTERESTED PARTIES MAY RSVP ON WEEK-DAYS, WITH RESPECT TO ATTENDANCE, TO:
Mailing address:
Buckeye PT Terminals, LP
ATTN: Frances Lindsley- Matthews - CT Air Permitting
380 Maurer Road
Perth Amboy, NJ 08861
Phone: 732-738-2065
Email: buckeyectairpermits@buckeye.com

This is also the contact for any questions, comments, or communication regarding needed accommodations for the meeting.

THE AGENDA FOR THE INFORMATIONAL MEETING WILL BE:

- GENERAL INTRODUCTION
- FACILITY DESCRIPTION
- PLANNED PERMITTING ACTIVITY
- PERMITTING REQUIREMENTS
- PUBLIC COMMENT

PROJECT DOCUMENTS CAN BE FOUND ONLINE AT
<https://www.buckeye.com/event/new-haven-forbes-terminal-public-meeting>

PRINTED COPIES OF THE MATERIALS WILL BE AVAILABLE AT THE MEETING.

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PUBLIC NOTICES

Town of East Haven - Zoning Board of Appeals NOTICE OF PUBLIC HEARINGS

Notice is hereby given that the East Haven Zoning Board of Appeals will conduct a regular meeting on Thursday, September 18, 2025 at 7:00 p.m. at the East Haven Senior Center, 91 Taylor Avenue, unless otherwise noticed, to hear the following applications:

Application No. 25-17 - Anthony Monaco, 480 Shorth Beach Road, An Appeal of an Order sent by the Zoning Enforcement Officer on July 24, 2025.

Application No. 25-18 - Paul and Trisha Norwood, 82 Glenmoor Drive. A request for variances to allow a detached garage and a new porch within a front and side yard setback area.

Application No. 25-19 - Elizabeth Lovering, 114 Morgan Avenue. A request to extend a detached deck within a side yard setback area.

For Application descriptions, see Meeting Agenda on Board's "Agenda" page on Town website at www.easthaven-ct.gov

PROBATE NOTICES

NOTICE TO CREDITORS

ESTATE OF Eleanor M. Froehlich (25-00290)

The Hon. Mark J. DeGennaro, Judge of the Court of Probate, District of West Haven Probate Court, by decree dated July 16, 2025, ordered that all claims must be presented to the fiduciary at the address below. Failure to promptly present any such claim may result in the loss of rights to recover on such claim.

Shamorrow Codner, Clerk

The fiduciary is:

Doreen Denhardt
c/o MARK A HEALEY,
MARK A. HEALEY,
666 SAVIN AVENUE,
WEST HAVEN, CT 06516

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GAS AND OIL VINTAGE
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TODAY'S PUZZLE
Difficulty Level: **MEDIUM**

			2	9	7			
		8	9					
7	6					4	5	
3	1		2	4	8			
		7		1	5		6	4
9							3	2
				5	1			
5	1		8					

YESTERDAY'S SOLUTION

1	7	6	3	9	4	2	5	8
5	2	3	1	8	7	9	4	6
4	8	9	5	2	6	1	7	3
9	6	4	8	5	2	3	1	7
7	1	8	9	6	3	5	2	4
3	5	2	7	4	1	8	6	9
6	9	7	2	1	8	4	3	5
8	4	1	6	3	5	7	9	2
2	3	5	4	7	9	6	8	1

Fill the grid so that every row, column, and 3x3 box contains the digits 1 through 9.

The solution to today's puzzle will appear in tomorrow's publication.

Monday, September 8, 2025

GOREN BRIDGE

WITH BOB JONES
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WEEKLY BRIDGE QUIZ ANSWERS

Q 1 - Neither vulnerable, as South, you hold:
NORTH EAST SOUTH WEST
1NT Pass 2♣ Pass
2♦ Pass ?
What call would you make?
A - You can't afford to worry about the singleton diamond. Bid 2NT.

Q 5 - North-South vulnerable, as South, you hold:
♠ 10 6 5 ♥ A Q 4 3 ♦ A K 7 ♣ 9 8 6

Q 2 - North-South vulnerable, as South, you hold:
♠ K Q 6 ♥ K 9 8 6 5 ♦ A Q J 9 4 ♣ Void

SOUTH WEST NORTH EAST
1♥ Pass 1♠ Pass
? ?
What call would you make?
A - This is a good hand with even better potential, but it is not worth a jump bid. Bid 2D.

Q 3 - East-West vulnerable, as South, you hold:
♠ 10 9 8 7 ♥ A K Q 6 ♦ J 10 6 ♣ Q 8

As dealer, what call would you make?
A - This hand is worth an opening bid. The usual bid would be 1D, but we wouldn't fault anyone who chose to open this particular hand 1H.

Q 4 - Both vulnerable, as South, you hold:
♠ 8 7 5 2 ♥ J 8 6 5 ♦ 10 ♣ A K J 10

NORTH EAST SOUTH WEST
1♠ Pass 2♥ Pass
3NT Pass ?
What call would you make?
A - We see no reason to prefer playing in spades rather than in no trump. We would still bid 4S to give partner a chance to bid again knowing we have a spade fit. It might lead to a slam.

Q 6 - East-West vulnerable, as South, you hold:
♠ K 3 ♥ A Q 8 6 ♦ 8 7 ♣ K 10 9 8 5

SOUTH WEST NORTH EAST
1♠ Pass 1♠ Pass
? ?
What call would you make?
A - Ugly. Not strong enough for 2H, can't raise spades, no diamond stopper, and a club suit that is not rebiddable. The best you can do is bid 1NT.

(Bob Jones welcomes readers' responses sent in care of this paper.)

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Request for Bids

ELECTRICAL RENOVATIONS AT McConaughy TERRACE

The Glendower Group, Inc. invites sealed bids from qualified electrical contractors for electrical work associated with two groups of units McConaughy Terrace, Funded under the 4% low-income Housing Tax Credit LIHTC program. A complete copy of the requirement may be obtained from Elm City's Vendor Collaboration Portal

<https://newhavenhousing.cobblestonesystems.com/gateway>
beginning on

Wednesday, September 3, 2025, at 3:00PM.

ANUNCIO DE LA REUNIÓN INFORMATIVA PÚBLICA

Buckeye New Haven Forbes Terminal

ABIERTO AL PÚBLICO EN GENERAL

UNA REUNIÓN INFORMATIVA SOBRE:

Buckeye planea presentar una solicitud de permiso de calidad de aire al Departamento de Energía y Protección Ambiental de Connecticut para permitir tres tanques de almacenamiento a granel existentes (tanques 30M, 31M y 32M) en la Terminal Forbes de New Haven; la terminal está ubicada en 134 Forbes Avenue, New Haven, CT 06512. No se planean cambios físicos u operativos en la instalación como parte de esta actividad de permisos. Los tanques de almacenamiento continuarán operando con controles de emisiones de tecnología avanzada según lo autorizado por el permiso de operación de calidad del aire del Título V actual de la instalación. Se adjunta un mapa de la zona.

SE LLEVARÁ A CABO EN: Ayuntamiento de New Haven, 165 Church St, New Haven, CT en las Salas de Reuniones 1 y 2

FECHA: Martes 7 de octubre de 2025 de 6-8 pm

ANTES DE LA REUNIÓN, LAS PARTES INTERESADAS PUEDEN CONFIRMAR SU ASISTENCIA EN DÍAS LABORABLES, CON RESPECTO A LA ASISTENCIA, A:

Dirección postal:
Buckeye PT Terminals, LP
ATTN: Frances Lindsley- Matthews – CT Air Permitting
380 Maurer Road
Perth Amboy, NJ 08861

Teléfono: 732-738-2065
Correo electrónico: buckeyectairpermits@buckeye.com

Este es también el contacto para cualquier pregunta, comentario o comunicación con respecto a las acomodaciones necesarias para la reunión.

LA AGENDA DEL DÍA DE LA REUNIÓN INFORMATIVA SERÁ:

- 1) INTRODUCCIÓN GENERAL
- 2) DESCRIPCIÓN DE LA INSTALACIÓN
- 3) ACTIVIDAD DE PERMISOS PLANIFICADA
- 4) REQUISITOS DE PERMISOS
- 5) COMENTARIO PÚBLICO

LOS DOCUMENTOS DEL PROYECTO SE PUEDEN ENCONTRAR EN LÍNEA EN:
<https://www.buckeye.com/event/new-haven-forbes-terminal-public-meeting>

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Attachment 13

Public Notice for Meeting - Signs Posted at the Facility

NOTICE OF AN
INFORMAL PUBLIC MEETING

BUCKEYE NEW HAVEN FORBES TERMINAL

**TOPIC: PLANNED AIR PERMIT SUBMITTAL FOR THREE
EXISTING GASOLINE STORAGE TANKS**



DATE:
October 7



LOCATION:
New Haven City Hall
Meeting Rooms 1&2
165 Church Street,
New Haven, CT 06510



TIME:
6pm - 8pm



For More Information: Scan this QR code, email BuckeyeCTAirPermits@buckeye.com
or visit <https://www.buckeye.com/event/new-haven-forbes-terminal-public-meeting>



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ANUNCIO DE LA
REUNIÓN INFORMATIVA PÚBLICA

BUCKEYE NEW HAVEN FORBES TERMINAL

**TEMA: PERMISO DE CALIDAD DE AIRE PARA TRES TANQUES
DE ALMACENAMIENTO A GRANEL EXISTENTES**

 FECHA: 7 de Octubre	 UBICACIÓN Ayuntamiento de New Haven 165 Church St, New Haven, CT en las salas de reuniones 1 y 2	 TIEMPO: 6 - 8pm
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Para mas información o preguntas visita
<https://www.buckeye.com/event/new-haven-forbes-terminal-public-meeting>
o manda correo electrónico a buckeyectairpermits@buckeye.com

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