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November 20, 2025

Jillian Alexander
Environmental Justice Coordinator
Division of Air Quality and Radiation Protection
401 East State Street
PO Box 420, Mail Code 401-02G
Trenton, NJ 08625-0420

Re: Environmental Justice Impact Statement Deficiency Letter Response
Global Companies LLC – Linden Terminal
2600 Marshes Dock Road
Linden, NJ 07036
EJ Project ID No. 35778569
Program Interest No. 41801
Permit Application BOP240002

Dear Ms. Alexander,

On behalf of Global Companies LLC (Global), Envirospec Engineering, PLLC is providing this response to comments on the Environmental Justice Impact Statement (EJIS) provided by NJDEP to Global in the letter dated October 23, 2025. A revised version of the EJIS is attached.

Comment 1:
Impacts on affected stressors
In Table 3 of the subsection titled "Ground Level Ozone (Adverse Stressor)", the VOC emissions deviate from the proposed emissions changes submitted with the permit application. The facility is currently permitted for 38.5 TPY of VOCs, excluding non-source fugitive and insignificant sources. The project calculations propose a VOC limit of 61.8 TPY in the air permit application. Please review Table 3 and ensure it is consistent with the air permit application.

Minor corrections have been made to the Potential to Emit (PTE) since the application was submitted based on discussions with the permit writer. Table 3 of the EJIS submitted on October 15, 2025 incorporated these corrections. Global is working with the permit writer to incorporate these changes into the permit as part of the application process.

Comment 2:
LICT
The RACT/BACT/LAER Clearinghouse (RBLC) lists several VOC control methods which have not been evaluated in the LICT, including leak prevention measures such as submerged filling. Please add consideration of other VOC control methods listed in the RBLC to the LICT analysis for the truck loading rack operations.

A revised LICT analysis has been incorporated into the attached revised EJIS. It is included as Attachment 10.

Should you have any questions please feel free to contact me at 518-453-2203.

Sincerely,

Gianna Aiezza

Gianna Aiezza, PE
Principal Engineer
Envirospec Engineering PLLC

cc:

Tom Keefe – Global Companies LLC
Steve Charron – Global Companies LLC

New Jersey Department of Environmental Protection (NJDEP)
Environmental Justice Impact Statement (EJIS)
Global Companies LLC

March 2025
Revised November 2025

Prepared for:

Global Companies LLC - Linden Terminal
2600 Marshes Dock Road, Linden, NJ 07036

NJDEP PERMIT APPLICATION
41801, BOP240002
EJ PROJECT ID: 35778569

Prepared by:

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I. Executive Summary

On behalf of Global Companies LLC (Global), Envirospec Engineering, PLLC (Envirospec) is submitting this Environmental Justice Impact Statement (EJIS) for a Title V air permit modification application (Application) submitted to the New Jersey Department of Environmental Protection (NJDEP) by Global on June 27, 2024, with an update submitted on October 17, 2024. The purpose of the Application was to revise permit conditions and emissions limits at the Global Facility located in Linden, New Jersey (Facility). The information provided in this EJIS meets the requirements in N.J.A.C. 7:1C.

The Facility is a stationary liquid energy storage and transfer terminal located at 2600 Marshes Dock Road, Linden, Union County, New Jersey, and currently operates under Permit Number BOP240003, issued on July 26, 2001. The Facility operates 24 hours a day, 7 days a week, and 52 weeks per year.

The NJDEP Environmental Justice Mapping, Assessment and Protection Tool (EJMAP) was utilized to determine whether the Facility was in an Overburdened Community (OBC) and to obtain initial stressor screening information. The Facility is located within block group 340390354001 in Linden City, Union County, New Jersey, which is classified as an overburdened community. The OBC criteria for this area are classified as "Minority". Utilizing the EJMAP initial screening information, the NJDEP has reported that nineteen (19) out of the total twenty-six (26) environmental or public health stressors were identified as adverse. As discussed in this EJIS, the revised permit conditions and associated emission limits, which do not include any physical changes at the facility, are not expected to have a significant impact on or contribute to the identified adverse stressors in the community. However, since the project does propose an increase to the Potential to Emit (PTE), as outlined in Section III.A, it is considered to be an expansion, and supplemental information is provided in this EJIS in accordance with N.J.A.C. 7:1C-3.3.

II. Facility Setting

Physical Description

Linden is a city in Union County in the northeast region of the state of New Jersey. The City is approximately eleven square miles in total area and bordered by the Rahway River.

The Facility is a liquid energy storage and transfer terminal located at 2600 Marshes Dock Road, New Jersey. The Facility is located at the South end of Linden, East of the New Jersey Turnpike,

and north of the Rahway River. Figure 1 below shows the location of the Facility. The blue line shows the facility boundary. A site plan is included as Attachment 1.

Figure 1.
Global Facility within the City of Linden

Municipal Area

The following sections provide a description of the municipal setting of the facility within the City of Linden.

Demographic Information

Linden is a city of approximately 43,950 residents, with a historically underrepresented population around 62%. The population is characterized as 31% White (not Hispanic or Latino), 35.6% Hispanic or Latino, 28.1% Black or African American, and 3.6% Asian. Fifty-seven percent of homes speak a language other than English (2023 US Census Bureau, most current information available on their website https://www.census.gov/).

Economic Information

Approximately 23% of the population of Linden has a Bachelor's degree or higher. The median household income is $91,036. Nine (9) percent of the population is at or below the poverty level. (2023 US Census Bureau, most current information available on their website https://www.census.gov/).

Zoning Information

The City of Linden is divided into twenty-five (25) zoning districts. The Facility is located in a Heavy Industrial District, directly adjacent to a Light Industrial District and an Economic Development District.

Marshes Dock Road borders the east side of the Facility and connects to Lower Road. The Union County Fire Academy and Linden Public Works Building are north of Lower Road in the Heavy Industrial District. A Two Family 50' Residential District is northeast of the Facility. Linden Airport (LDJ) is located in the adjacent Economic Development District north of the Facility. Hawk Rise Sanctuary is west of the Facility and part of the Heavy Industrial District (re-development site) but is not located directly adjacent to the Facility.

A zoning map of the City of Linden is included as Attachment 2 (https://linden-nj.gov/documents/official-maps-of-the-city-of-linden/).

Schools

Schools in the City of Linden include Sinai Christian Academy, Soehl Middle School, McManus Middle School, Linden High School, and several elementary schools (School One, School Two, School Four, School Five, School Six, School Eight, School Nine, and School Ten).

Hospitals and Nursing Homes

There are no hospitals located in Linden, NJ. Nursing homes and assisted living facilities in Linden, NJ include AristaCare at Parkside and Delaire Assisted Living.

Parks, Playgrounds, and Recreational Areas

A list of parks and recreational spaces in Linden is provided in Table 1 organized by Ward. The Global Linden facility is located in the 7th Ward.

Table 1. Parks and Recreational Areas.

1st WARD
Capt. James J Dunn Memorial Park
Sgt. Alexander Wales Memorial Park
Clifford Lawson Memorial Park
2nd WARD
Cpl. Ronald Knosky Memorial Park
Lexington Avenue Park
Blanke Street Park
Miltonia Street Park
3rd WARD
James Dobson Park
4th WARD
Cleveland Avenue Park
George T. Farawell Memorial Park
Dr. Martin L. King, Jr. Memorial Park
Hattie Johnson Playground
5th WARD
Charles Street Park
James Iozzi Memorial Park
Fifth Ward Park
Hagel Avenue Park
6th WARD
Eddy Avenue Park
General Casimir Pulaski Park
L/Cpl. Melnyk Memorial Park
7th WARD
Clinton Street Play Area
Buchanan Street Park
Memorial Park
Seventeenth Street Park
Seventh Ward Park
Tremley Park
Hawkrise Conservation
8th WARD
Wanda Anita Green Memorial Park
Bachellor Avenue Park
Milkosky Park
Dorothy Ford Park
McGillvray Place Park
9th WARD

Newton Street Park
Paul W. Werkmeister Park
Thomas J. Wieser Park
Woodrow Wilson Memorial Park
10th WARD
Al Kalla Park
Windsor Road at Stiles Street

Residential Properties

Though areas near the facility are primarily zoned for industrial, there are several residential areas throughout the City of Linden. Residential housing in the City is primarily two-family housing and apartments, except for single family housing in Wards 9 and 10 in the northwestern area of Linden.

Area within One Mile of Facility

The following sections provide a description of the area within one mile of the facility.

Schools and Childcare Centers

Two schools, Private Nicholas Minue Elementary and Saint Joseph School, and two childcare centers, Carteret BoE at Private Nicholas Minue School and Bright Star Day Care, are located within one mile of the Facility. Both schools and both childcare centers are located more than ¼ mile from the Facility on the other side of the Rahway River. The locations are shown in Figure 2.

Figure 2. Schools, Childcare Centers, and Parks within One Mile of Facility.

Hospitals and Nursing Homes

There are no hospitals, medical centers, or nursing homes within one mile of the Facility.

Parks, Playgrounds, and Recreational Areas

Parks, Recreational Areas, and Open Spaces within one mile of the Facility include Joseph Medwick Park, Veterans Memorial Park, Flanagan Field, Merck Athletic Park, Buchanan Street Park, Hawk Rise Sanctuary, Tremley Park, and multiple Linden Public Open Spaces. All are located more than ¼ mile from the facility, except for Joseph Medwick Park across the Rahway River from the facility. The locations of parks, recreational areas, and open spaces within one mile of the facility are shown in Figure 2.

Residential Properties

The closest residences are located 0.6 miles northeast of the Facility, and 0.4 miles southwest of the Facility, across the Rahway River.

Demographic and Economic Information

The nearest residential area 0.6 miles northeast of the facility is approximately 59% historically underrepresented, with 21.9% of the population classified as low income. The nearest residential area 0.29 miles southwest of the facility, across the Rahway river, is approximately 82.8% historically underrepresented, with 37.5% classified as low income.

III. Facility Operations

A. Purpose of Permit Application

Current Operations

The Facility is a liquid energy storage and distribution terminal that currently operates under Title V Operating Permit BOP240003 and Program Interest Number 41801, issued by NJDEP., The Facility has fourteen (14) aboveground tanks, three oil water separators and two natural gas-fired combustion units with a capacity of < 1 million British Thermal Units per hour (MMBtu/hr). The terminal is classified under Standard Industrial Code (SIC) 5171, Petroleum Bulk Stations and Terminals.

Tanks range in size from less than 1000 gallons to over six million gallons. Operations include receipt of refined and renewable fuels via truck or pipeline; storage of the materials in tanks; and subsequent distribution of these materials via truck. Bulk products stored include gasoline, ethanol, diesel, and heating oil. The Facility operates 24 hours a day, 7 days a week, and 365 days a year.

Storage tanks and loading operations are equipped with monitoring and control equipment as required by the Facility's Title V Permit.

Project Description

Upon purchase of the Facility from Gulf Oil Limited Partnership (Gulf) in April 2024, Global identified errors in the permit. The proposed project updates permit information to resolve non-compliance issues self-reported to NJDEP by Global after obtaining ownership from Gulf and to

update emissions calculations to be in accordance with current EPA AP-42 methods. To correct the permit, Global updated PTE calculations and submitted a permit modification to NJDEP (Application).

No actual physical changes are proposed to operations. The following changes were made to the PTE:

- Increases in allowable vapor pressure for gasoline tanks from 8.3 psia @ 70 degrees F to 13.0 psia @ 70 degrees F to align with state and federal RVP limits of gasoline.
- Increase in tank throughputs to align with rack throughputs.
- Incorporation of gasoline fugitive emissions during tank truck loading into the PTE in conformance with EPA AP-42 emission factors.
- Grouping of cleaning emissions for internal floating roof (IFR) tanks to replace separate limits for individual tanks.
- The addition of cleaning emissions for Fixed Roof Tanks.

Though the potential emissions are increasing as a result of the project, no changes to actual emissions are anticipated.

Project Alternative

No project alternatives are being considered because the project does not involve any physical changes to the Facility. The proposed project updates permit information to resolve non-compliance issues self-reported to NJDEP by Global after obtaining ownership from Gulf and to update emissions calculations to be in accordance with EPA AP-42 methods.

B. Process

1. Pollution/Environmental Control Measures – Current emissions control measures, which include the Vapor Recovery Unit (VRU) and a portable Vapor Combustion Unit (PVCU) will continue to be used. The VRU is used to control emissions at the truck loading rack, and the PVCU is used during tank degassing, cleaning, and sludge removal operations, where required.

2. Pollution/Environmental Monitoring Instrumentation – A Continuous Emissions Monitor (CEMs) is used at the truck loading rack to continuously monitor emissions from the VRU. The CEMs will continue to be used.

3. Hours of Operation – Global operates 24 hours a day, 7 days a week, and 365 days a year. Potential emissions for the Facility are based on operating all equipment for 8760 hours per year.

4. Onsite Equipment – There will be no onsite equipment added as part of the project.

5. Traffic Routes – There will be no changes in traffic routes as a result of this project. Additional information on traffic routes in the vicinity of the facility is provided in Section VIII.

6. Number of Employees – Global currently provides employment to approximately 6 people living in the surrounding communities. There will be no long-term or contracted employees added because of this project.

7. Other Information relevant to potential to contribute to environmental and public health stressors in OBC – There is no additional information.

C. New or Expanded Facilities

Though this project is classified as a facility expansion due to the change in the PTE, no physical changes are planned, and no construction activities will be completed.

D. Permits

The list of facility permits is provided in Table 2.

Table 2. Global Permits

Agency	Permit Name	Permit Number	Media
NJDEP	Air Pollution Control Operating Permit	BOP240003	Air
NJDEP	New Jersey Pollutant Discharge Elimination System Permit	NJG0318272	Water
NJDEP	New Jersey Pollutant Discharge Elimination System Permit	NJ0000311	Water
NJDEP	Resource Conservation and Recovery Act Permit	NJR000044776	Waste
NJDFS	Life Hazard Use Certificate	2009-046610	Fire

IV. Evidence of Satisfaction of Any Local EJ or Cumulative Impact Analysis Requirements

This section is not applicable.

V. Initial Screening Information (N.J.A.C. 7:1C-2.3)

Global performed initial screening for community stressors in Linden City pursuant to N.J.A.C. 7:1C-2.3. Stressor categories include concentrated areas of air pollution, mobile sources of air pollution, contaminated sites, transfer stations or other solid waste facilities, recycling or scrap metal facilities, point sources of water pollution, potential health impacts, density/proximity stressors, and social determinants of health. This screening, which was produced from data in EJMAP, is shown in the table below. The overburdened community has a combined stressor total value of 19, which is higher than the states and counties 50th percentile of total stressor value, which excludes other overburdened communities from the comparison. Therefore, the OBC is considered to be subject to adverse cumulative stressors. In accordance with N.J.A.C 7:1C-3.2, an assessment of positive and negative impacts of the Global modification project on each environmental and public health stressor is presented in the following sections.

Overburdened Community Stressor Summary

Block Group: 340390354001 **Municipality: Linden City** **County: Union** **OBC Criteria: Minority**

Combined Stressor Total	
Block Group Value: Combined Stressor Total	**19**
Greatest Stressed OBC Neighbor CST Value if applicable	**NA**
County	15
State	13
Geographic Point of Comparison	**13**
Adverse Cumulative Stressors	**Higher than 50th Percentile**

Concentrated Areas of Air Pollution					
Stressor	**Block Group Value**	County Non OBC 50th	State Non OBC 50th	**Geographic Point of Comparison**	**Adverse Stressor**
Ground-Level Ozone (3-year average days above standard)	**2.208**	1.000	0.667	**0.667**	**Yes**
Fine Particulate Matter ($PM_{2.5}$) (3-year average days above standard)	**3.831**	4.333	3.881	**3.881**	**No**
Cancer Risk from Diesel Particulate Matter (estimated cancer risk/million)	**0.040**	0.320	0.200	**0.200**	**No**
Cancer Risk from Air Toxics Excluding Diesel Particulate Matter (estimated cancer risk/million)	**3.033**	29.853	28.715	**28.715**	**No**
Non-Cancer Risk from Air Toxics (Combined Hazard Quotient)	**0.166**	1.261	1.086	**1.086**	**No**

Mobile Sources of Air Pollution					
Stressor	**Block Group Value**	County Non OBC 50th	State Non OBC 50th	**Geographic Point of Comparison**	**Adverse Stressor**
Traffic – Cars, Light- and Medium-Duty Trucks (Annual Average Daily Traffic (AADT)-mile/square mile)	**349,535.217**	81,196.584	68,884.439	**68,884.439**	**Yes**
Traffic – Heavy-Duty Trucks (AADT-mile/square mile)	**37,773.827**	201.327	1,286.303	**201.327**	**Yes**
Railways (rail mile/square mile)	**1.957**	0.018	0.000	**0.000**	**Yes**

Contaminated Sites					
Stressor	**Block Group Value**	County Non OBC 50th	State Non OBC 50th	**Geographic Point of Comparison**	**Adverse Stressor**
Known Contaminated Sites (weighted sites/square mile)	**11.304**	5.483	1.792	**1.792**	**Yes**
Soil Contamination Deed Restrictions (percent area)	**10.332**	0.000	0.000	**0.000**	**Yes**
Ground Water Classification Exception Area/Currently Known Extent Restrictions (percent area)	**40.816**	0.000	0.000	**0.000**	**Yes**

Transfer Stations, or Other Solid Waste Facilities, Recycling Facilities, Scrap Metal Facilities					
Stressor	**Block Group Value**	County Non OBC 50th	State Non OBC 50th	**Geographic Point of Comparison**	**Adverse Stressor**
Solid Waste Facilities (sites/square mile)	**0.466**	0.000	0.000	**0.000**	**Yes**
Scrap Metal Facilities (sites/square mile)	**0.547**	0.000	0.000	**0.000**	**Yes**

Point-Sources of Water Pollution					
Stressor	**Block Group Value**	County Non OBC 50th	State Non OBC 50th	**Geographic Point of Comparison**	**Adverse Stressor**
Surface Water (percent of uses impaired)	**73.217**	100.000	91.948	**91.948**	**No**
Combined Sewer Overflows (count)	**0.000**	NA	NA	**NA**	**No**

May Cause Potential Public Health Impacts					
Stressor	**Block Group Value**	County Non OBC 50th	State Non OBC 50th	**Geographic Point of Comparison**	**Adverse Stressor**
Drinking Water (count of public drinking water violations or exceedances, or percent of private well testing exceedances)	**0**	NA	NA	**NA**	**Yes**
Potential Lead Exposure (percent houses older than 1950)	**48.690**	29.741	13.966	**13.966**	**Yes**
Lack of Recreational Open Space (population/acre of open space within 0.25 mile)	**16.816**	23.339	18.775	**18.775**	**No**
Lack of Tree Canopy (percent lack of tree canopy)	**88.889**	63.661	60.963	**60.963**	**Yes**
Impervious Surface (percent impervious surface)	**60.500**	40.491	34.706	**34.706**	**Yes**
Flooding (Urban Land Cover) (percent urban land use area flooded)	**71.541**	8.422	7.550	**7.550**	**Yes**

Density/Proximity Stressors					
Stressor	**Block Group Value**	County Non OBC 50th	State Non OBC 50th	**Geographic Point of Comparison**	**Adverse Stressor**
Emergency Planning Sites (sites/square mile)	**0.885**	0.097	0.025	**0.025**	**Yes**
Permitted Air Sites (sites/square mile)	**2.834**	1.454	0.762	**0.762**	**Yes**
NJPDES Sites (sites/square mile)	**0.354**	0.000	0.000	**0.000**	**Yes**

Social Determinants of Health					
Stressor	**Block Group Value**	County Non OBC 50th	State Non OBC 50th	**Geographic Point of Comparison**	**Adverse Stressor**
Unemployment (percent unemployed)	**10.354**	3.014	3.674	**3.014**	**Yes**
Education (percent without high school diploma)	**17.886**	1.764	3.067	**1.764**	**Yes**

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

Data Source: Environmental Justice (EJ) Law Combined Stressor Summary for New Jersey, published 1/31/2025

VI. Assessment of Impacts (Positive/Negative)

This section summarizes the potential impacts of the project on the twenty-six environmental and public health stressors that are shown in the table in Section V. Both positive and negative impacts are discussed. Current operations at this Facility are already accounted for in the stressor table in Section V.

Concentrated Areas of Air Pollution

Union County, New Jersey is currently severe non-attainment for the 2008 8-hour ozone standard (https://www3.epa.gov/airquality/greenbook/hncs.html#NJ) and serious non-attainment for the 2015 8-hour ozone standard (https://www3.epa.gov/airquality/greenbook/jbcs.html#NJ). Union County, New Jersey is in attainment for all other National Ambient Air Quality Standards, including fine particulates, sulfur dioxide, carbon monoxide, nitrogen dioxide, and lead (Reference - EPA Green Book, Nonattainment Areas for Criteria Pollutants, most current information available on website).

Ground Level Ozone (Adverse Stressor)

Ground-level ozone forms when VOC and NOx react in the presence of sunlight. Net air emissions of VOC and NOx from the proposed project modifications are shown in Table 3, which compares the project PTE to the current permit limits. Table 4 shows the detailed comparison of the project PTE to current permit limits. The increase in potential emissions due to the project will not result in a significant increase in VOC emissions (< 25 tpy, as defined in NJAC 7:27-18) and will result in no increase in NOx emissions. The project is not anticipated to increase actual emissions as this is a project to correct errors in the permit. Therefore, this project will not have a significant impact on this stressor in the community.

Table 3. Net NOx and VOC Emissions from Proposed Project

Pollutant	Net Emissions Tons per Year
Nitrous Oxides (NOx)	0.00
Volatile Organic Compounds (VOC)	22.47

Table 4. VOC Potential Emissions Comparison of Proposed Project to Current Permit

Emissions Source	Global/ Project PTE Emissions (tpy)	Permit Limit (tpy)*	Project minus Permit (tpy)
IFRs, Routine and Landings			
102	2.74	2.41	0.33
103	2.06	1.92	0.14
111	5.37	2.62	2.75
112	4.97	3.15	1.82
113	6.59	4.89	1.7
IFRs, Cleanings	3.27	2.2	1.07
VFRs, Routine			
101	1.61	1.61	0
104	0.36	0.36	0
110	1.06	1.06	0
VFRs, Cleanings	1	0	1
LOADING RACK			
Truck Loading to VRU (Gasoline)	18.27	19.23**	13.66
Truck Loading Fugitives (Gasoline)	14.62		
Total Increase due to IFRs, VFRs, Loading Rack			**22.47**

*= Permit Limit for individual IFRs excludes cleanings for this comparison and has been separated into an individual line item for cleanings.
** = Permit limit for the loading rack also includes FG1 listed under non-source fugitive emissions.

Fine Particulate Matter (Not an Adverse Stressor)

Particulate air pollution is a complex mixture of organic and non-organic substances occurring in the atmosphere as solid or liquid droplets. Manmade particulates can come from fossil fuel combustion. Particulates are measured in microns (one millionth of a meter). Particulates with diameters of 2.5 microns or less are considered "fine particulate matter" and are referred to as $PM_{2.5}$.

The project does not impact emissions of $PM_{2.5}$, so there will be no contribution to fine particulate matter.

Cancer Risk from Diesel Particulate Matter (Not an Adverse Stressor)

Cancer risk from diesel particulate matter is the result of particulates formed from diesel fuel combustion. Particulate matter from diesel exhaust contains small amounts of known carcinogens. The project will not impact the combustion of diesel fuel, so there will not be any contribution to cancer risk from diesel particulate matter.

Cancer Risk from Air Toxics Excluding Diesel Particulate Matter and Non-Cancer Risk from Air Toxics (Combined Hazard Quotient) (Not Adverse Stressors)

Hazardous air pollutants (HAPs), also known as air toxics, are those pollutants that are known or suspected to cause cancer or other serious health effects. HAPs, including benzene, are present in gasoline products.

Cancer risk from air toxics excluding diesel particulate matter and non-cancer risk from air toxics are not adverse stressors in the community. Based on the information obtained from EJMAP, the block group values are significantly less than the 50th percentile value for both stressors.

The Facility is currently permitted for total HAPs with individual HAP emission limits for benzene, toluene, and xylene for the loading rack. The project does not include an increase in potential HAP emissions above current permit limits. Therefore, there will not be an impact on these stressors as a result of the project.

Mobile Sources of Air Pollution

Traffic – Cars, Light- and Medium-Duty Trucks (Annual Average Daily Traffic (AADT)-mile/square mile) (Adverse Stressor)

There will be no impact on the annual average daily traffic miles per square mile because of this project. There is no increase in traffic as a result of this project.

Traffic – Heavy-Duty Trucks (AADT-mile/square mile) (Adverse Stressor)

There will be no impact on the annual average daily traffic miles per square mile because of this project. There is no increase in traffic as a result of this project.

Railways (rail mile/square mile) (Adverse Stressor)

No railways will be constructed due to the project so there will be no increase in the railway miles per square mile for the block group and no impact on this stressor. Railway traffic is not required for this project and will not be impacted.

Contaminated Sites

Known Contaminated Sites (weighted sites/square mile) (Adverse Stressor)

New Jersey's Known Contaminated Sites (KCS) List identifies all properties within the state with confirmed soil and/or ground water contamination levels greater than applicable standards. This dataset broadly includes contaminated sites at various stages of remediation (not yet started, currently underway, completed, or completed with implementation of an engineering/institutional control). For this stressor, however, only KCS where remediation is pending or in progress are included. Fully remediated sites with engineering/institutional controls in place under a Remedial Action Permit (RAP) are included under other stressors in this category.

The Facility has areas of active remediation. The project modifications will not affect remediation. The contamination was from a former owner who is also the responsible party for the remediation.

Details on the cases can be found using the DataMiner page on the NJDEP SRP website at https://dep.nj.gov/srp/ by searching the Program Interest (PI) number. Spill cases are being remediated at the direction and oversight of Licensed Site Remediation Professionals (LSRPs) under the NJDEP Site Remediation Program (SRP) in accordance with the Technical Requirements for Site Remediation (N.C.A.C. 7:26E).

Soil Contamination Deed Restrictions (percent area) (Adverse Stressor)

Sites with complex contamination issues can have several sources of contamination and can impact both the soil and ground water. For KCS List sites where remediation is complete such that it no longer poses a threat to public health, but the soil and/or ground water still does not meet the requisite standards, restrictions are placed on use of the site. In cases where soil contamination remains above the Soil Remediation Standards (N.J.A.C. 7:26D), NJDEP requires the addition of a deed notice to the property's title and in some cases, the implementation of an engineering control.

There are currently no areas at the site with environmental deed notices.

Ground Water Classification Exception Area/Currently Known Extent Restrictions (percent area) (Adverse Stressor)

For Known Contaminated Sites where the ground water does not meet the requisite standards, restrictions are placed on the use of the site ground water. A Classification Exception Area (CEA) is established as a notification that the Ground water Quality Standards (N.J.A.C. 7:9C) have been exceeded and ensures the use of the ground water in an area is restricted until the standards are achieved.

The Facility has one CEA (CEA10000123971) where Ground Water Quality Standard (GWQS) exceedances for specific contaminants have been identified (PI 006342). This is the result of a former owner, who is also responsible for the remediation. Additional details are provided in Section VIII.

The project will not contribute to additional groundwater contamination and groundwater will not be used.

Transfer Stations, or Other Solid Waste Facilities, Recycling Facilities, Scrap Metal Facilities

Solid Waste Facilities (sites/square mile) (Adverse Stressor)

Solid waste facilities include resource recovery facilities and incinerators, transfer stations or other solid waste facilities, recycling facilities intended to receive at least 100 tons of recyclable materials per day, landfills (including, but not limited to those accepting ash, construction or 3-8 demolition debris, or solid waste), resource recovery facilities and other waste incinerators, and medical waste incinerators (except those associated with a hospital or university to process self-generated regulated medical waste).

Global is not a solid waste facility and no construction is planned for this project, therefore no solid waste will be generated from the project and the number of solid waste facilities per square mile will not increase.

Scrap Metal Facilities (sites/square mile) (Adverse Stressor)

Global is not a scrap metal facility and will not begin handling scrap metal because of the project. As such, the project will not impact the number of scrap metal facilities per square mile.

Point-Sources of Water Pollution

Surface Water (percent of uses impaired) (Not an Adverse Stressor)

NJPDES permits for the facility are listed in Table 5. The project will not contribute to surface water impairment and there will be no changes to water discharges as a result of the project.

Table 5. Global Wastewater and Stormwater Permits

Agency	Permit Name	Permit Number	Media
NJDEP	New Jersey Pollutant Discharge Elimination System Permit	NJ0000311	Water
NJDEP	New Jersey Pollutant Discharge Elimination System Permit	NJG0318272	Water

Combined Sewer Overflows (count) (Not an Adverse Stressor)

There are no Combined Sewer Overflows (CSOs) at the facility. Therefore, there will be no impacts to CSOs as a result of this project.

Drinking Water (count of public drinking water violations or exceedances, or percent of private well testing exceedances) (Adverse Stressor)

Drinking water can become contaminated at the water source as well as in the distribution system after treatment. Contamination can come from naturally occurring chemicals and minerals, land uses such as fertilizers, pesticides, and road salt; manufacturing processes, and more; as well as contaminants leaching into the treated water as it passes through the distribution system.

NJDEP lists specific contaminants in drinking water that can cause various health concerns in their Environmental Justice Technical Guidance document. The project will not affect this stressor because it will not cause water contamination and water quality will not be affected. There are no changes to water discharges as a result of this project.

Potential Lead Exposure (percent houses older than 1950) (Adverse Stressor)

The project will not affect the percentage of houses older than 1950 in the block group. The project does not involve the construction or demolition of houses.

Lack of Recreational Open Space (population/acre of open space within 0.25 mile) (Not an Adverse Stressor)

There will be no expansion to the Facility, and recreational space will not be added or removed as part of the project. This project affects the Facility's existing footprint and there are no physical changes. Therefore, the project will have no effect on this stressor.

Lack of Tree Canopy (percent lack of tree canopy) (Adverse Stressor)

The project will not affect the tree canopy in the block group. Trees will not be added or removed as part of the project.

Impervious Surface (percent impervious surface) (Adverse Stressor)

Impervious surfaces are areas covered in materials that do not allow water to soak into soil, such as buildings, sidewalks, and roadways. No construction is planned for the project, so impervious surface area will not be affected.

Flooding (Urban Land Cover) (percent urban land use area flooded) (Adverse Stressor)

A flood indicator report for the Facility was obtained from New Jersey's Climate Change website and is included in Attachment 3. The majority of Facility is within the Federal Emergency Management Agency (FEMA) effective 500-year flood zone with an annual flood hazard of 0.2 percent, with part of the eastern area of the facility in the 1% annual flood hazard zone. There are two regulatory floodways and no special floodways within the Facility.

No flooding impacts (including potential sea level rise) are expected from the project. There are no physical changes, and the operational changes will not impact flooding.

Density/Proximity Stressors

Emergency Planning Sites (sites/square mile), Permitted Air Sites (sites/square mile), NJPDES Sites (sites/square mile) (Adverse Stressors)

Global currently holds multiple air permits and NJPDES permits as shown in Table 2 in Section III.D. No new air or water permits will be required for the project. Global also has an Emergency Response Plan as required by state and federal regulation. The project will therefore not affect the number of emergency planning sites, permitted air sites, or permitted NJPDES sites in the block group.

Social Determinants of Health

Unemployment (percent unemployed) (Adverse Stressor)

Global currently provides employment to approximately 6 people living in the surrounding communities, and terminal activities support an additional 25 or more contractors. Global will not have any change in employment because of this project, so there is no effect on this stressor on the block group.

Education (percent without high school diploma) (Adverse Stressor)

Insufficient education is a socio-economic factor that can contribute directly to unemployment. The education stressor in EJMAP is evaluated based on the percentage of the community aged 25 and over without a high school diploma. Education is an adverse stressor in this block group. The project involves corrections to the permit to reflect current operations. There are no changes that would affect education. The project will have no effect on this stressor on the block group.

VII. Public Participation N.J.A.C. 7:1C-4

Upon authorization from NJDEP to proceed with the public participation process, Global will schedule a public engagement procedure that complies with the requirements set forth in N.J.A.C. 7:1C Subchapter 4. All forms of public notification, as well as the public hearing presentation, will be translated into Spanish. A Spanish translator will also be present at the public information hearing. Upon completion of the public notification requirements detailed below, there will be a period of at least 60 days before the public information hearing is held. There will also be a public comment period of at least 60 days, which will extend at least 30 days after the public hearing. The start and end date of the public comment period is pending authorization from the NJDEP and will be included in all public notice documents.

To complete public notification requirements, Global will:

i. Provide a copy of this EJIS and the Application for the revision of permit conditions and emissions limits to the Linden City Clerk's office located at 301 North Wood Avenue #1, Linden, New Jersey 07036 and the Linden Public Library located at 31 East Henry Street, Linden, New Jersey 07036.
ii. Publish notice of the public hearing in the following local newspapers:
    a. English language: Union News Daily (1291 Stuyvesant Avenue P.O. Box 3639, Union, NJ 07083 (908-686-7700).

b. Spanish language: El Especialito (3711 Hudson Ave, Union City, NJ 07087, (201) 348-1959).

iii. Provide notice of the hearing to NJDEP, the Linden City Clerk's office, Mayor Derek Armstead, City Council President Michele Yamakaitis, and 7th Ward Councilman Ralph Strano.

iv. Provide written notice of the hearing through certified mail to all persons owning or residing on land located within 200 feet of the Facility and to any easement holders for that land who are listed in the tax records for the city of Linden.

v. Post two signs (one in English and one in Spanish) (Attachment 4) in legible condition on the site of the Facility until the public comment period is concluded that advises the public of the public hearing and the opportunity for public comment. The site sign will be posted to the right of the cell phone sign at the entrance gate, as depicted in Figure 4 in Attachment 4. The signs will be located in a prominent location(s) viewable by the public and contain sufficient detail in a language or language representative of the residents of the overburdened community as to inform of the Application, and the method by which the public may obtain information about such proposed Application.

vi. Provide notice through other methods identified by the applicant to ensure direct and adequate notice to individuals in the overburdened community (e.g., providing information directly to active community groups or organizations, automated phone, voice, or electronic notice, flyers, and/or utilization of other publications utilized within the overburdened community). Specifically, NJEJA will be invited to participate in the hearing, as outlined in item vii.

vii. Inviting NJDEP, the Linden City Clerk's office, Mayor Derek Armstead, City Council President Michele Yamakaitis, 7th Ward Councilman Ralph Strano, and NJEJA to participate in the public hearing.

Following the completion of the items listed above, Global will provide the following to the NJDEP:

i. Proof of publication of the notice of public hearing in both newspapers named above.
ii. A dated copy of the notice published in both newspapers named above.
iii. Copies of and mailing receipts for written notices.
iv. Photos providing proof of the posting and maintenance of two signs on site at the Facility.

A written public notice example for the proposed Facility modifications is included as Attachment 5. This notice will also be translated into Spanish. This notice will include the information required by N.J.A.C. 7:1C-4.1(b), including:

i. The name of the applicant and the date, time, and location of the hearing, as well as a link to register for the virtual component (information about hearing is pending authorization

from the NJDEP).
ii. A description of the proposed project.
iii. A map indicating the location and street address of the Facility, tax map block and lot, and the size of the property.
iv. A summary of the EJIS and information on how one may review a copy of the complete EJIS.
v. An invitation to participate in the public hearing and notification of the public comment period, which will be at least 60 days and extend no less than 30 days after the public hearing, and an invitation to email Facility Vice President of Environmental, Health, & Safety Tom Keefe at tkeefe@globalp.com with written comments.
vi. Any other information deemed appropriate by the NJDEP.

All public participation documents will also be translated into Spanish and will include a link to register for the online component of the public hearing. Global will schedule the public hearing as follows:

i. The proposed location for the hearing is the Linden Public Library. Though this location is outside the community (block group), it is proposed because it is publicly accessible by train and bus, is handicap accessible, and has the technology available to allow for remote/ hybrid meeting participation. There are no municipal buildings within a one half mile of the facility. The area surrounding the facility is a 0.6 mile walk from the nearest bus station and is surrounded by several private businesses that may have security requirements. Technology may also not be available to allow for remote meeting participation. Therefore, the Linden Public Library is proposed.
ii. The hearing will be conducted on a weekday no earlier than 6:00 pm Eastern Standard Time/Eastern Daylight Time. Exact date and time of the public hearing is pending authorization from the NJDEP to proceed with the public participation process.

At the public hearing, Global will provide a clear, accurate, and complete presentation of the information contained in this EJIS and will accept written and oral comments from any interested parties. Global will also adhere to public hearing best practices set forth by the NJDEP by including Spanish translation in all presentations and a virtual component. This hearing will be recorded and transcribed. The public comment period will begin upon completion of the notification requirements listed above and will remain open for at least 30 days following the public hearing. After the close of the public comment process, Global will:

i. Provide a written transcription of the public hearing.
ii. Provide a summary of the public comments and associated responses made at the public hearing, and a copy of the comments provided in writing during the public comment period along with responses by Global.

VIII. Supplemental Information

Supplemental information is required if a facility is in an overburdened community that is subject to adverse cumulative stressors, or the project would create a disproportionate impact by creating adverse cumulative stressors in the overburdened community. Since this facility is in an overburdened community that is subject to adverse cumulative stressors, supplemental information is required and provided in the following sections.

Site Mapping

Site maps with the following information are provided in Attachment 6.

- Topographic conditions, contour data, drainage patterns, wetlands and coastal zones
- Known plant or animal species on Federal or State endangered, threatened or rare plant or animal species list
- Water classifications, designated uses, and limitations of surface water bodies
- Public Scenic Attributes/ Outdoor recreation and conservation opportunities

Though the map of endangered, threatened, or rare plant or animal species, which was obtained from the NJDEP Land Resource Protection Web Application, shows small portions of the site are classified as habitat areas on the facility property along Marshes Dock Rd and the Rahway River, the property has been zoned for industrial activity, with the facility operating for decades at this location. There have been no recent sightings of endangered, threatened, or rare plant or animal species. This project does not involve any physical changes and would not impact endangered, threatened, or rare plant or animal species.

The land usage map shows a small area of wetland on the property along the Rahway River, which has been classified as saline marsh, and a forested area on the southwest area of Block 581 Lot 15.02 parcel. This project does not involve any physical changes and would not impact the wetland or forested areas.

The water classification map shows that the facility is bordered to the south by the Rahway River, which is classified as a stream/river. The Rahway River is designated as SE3 water, which has the following designated uses (N.J.A.C. 7:9B-1.12): 1) secondary contact recreation, 2) maintenance and migration of fish populations, 3) migration of diadromous fish, 4) maintenance of wildlife, and 5) any other reasonable uses. This project does not involve any physical changes and would not impact water usage or classification.

As discussed in Section II and shown in the map of public spaces, there are parks within one mile of the facility, with the closest being Joseph Medwick Park located to the south of the facility across the Rahway River. This project does not involve any physical changes and would not impact nearby parks or recreational areas.

Site Contamination

As discussed in Section VI, there is existing and historical contamination at the facility from site activities under the previous owner. Ongoing monitoring and remediation are the responsibility of the former owner. Arcadis (former consultant to the former owner) completed the Remedial Action Work Plan (RAWP) in 2024 (Arcadis 2024), which describes previous remedial investigations completed at the site since 1988. There were 45 areas of concern (AOCs) at the site that were grouped into three areas: Operations Area, Northern Tank Farm, and Southern Tank Farm. The primary constituents of concern (COCs) in soil are the following:

- Petroleum hydrocarbon-related volatile organic compounds (VOCs), e.g., benzene, toluene, ethylbenzene, and xylenes (collectively known as BTEX), methyl tertiary butyl ether (MTBE), tertiary butyl alcohol (TBA)
- Chlorinated VOCs (CVOCs), e.g., cis-1,2-dichloroethene (cis-1,2-DCE), trichloroethene (TCE), vinyl chloride (VC)
- Semivolatile organic compounds (SVOCs), e.g., naphthalene, 2-methylnaphthalene
- Lead
- Extractable petroleum hydrocarbons (EPH).

Primary constituents of concern in groundwater are the following:

- Petroleum hydrocarbon-related VOCs, e.g. BTEX, MTBE, TBA
- CVOCs, e.g. 1,2-dichloroethane (1,2-DCA), 1,1-dichloroethene (1,1-DCE), cis-1,2-DCE, TCE, VC
- SVOCs, e.g. 2-methylnaphthalene
- Lead

Light non-aqueous phase liquid has been historically observed at the truck loading rack and within the Southern Tank Farm. Dense non-aqueous phase liquid (DNAPL) was historically detected in one monitoring well but has not been detected since November 2010.

Previous remedial actions at the site are described in the 2024 RAWP for the site and have included LNAPL recovery, DNAPL recovery, in situ bioremediation using emulsified vegetable oil to enhance reductive dechlorination, and in situ thermal remediation. The 2024 RAWP identified the following remedial actions for the site:

- Engineering controls to include fencing and signage and capping, with periodic inspections
- Institutional controls, including a deed notice and groundwater CEA
- Monitored Natural Attenuation (MNA)

This project will not result in any physical changes to the facility and is not expected to impact site remedial activities.

Ambient Air Quality Data

Ambient Air Quality data for criteria pollutants from nearby monitoring sites for the years 2021 through 2023 are summarized in Table 6.

As discussed in Section VI, Union County, New Jersey is classified as severe non-attainment for the 2008 8-hour ozone standard and serious non-attainment for the 2015 8-hour ozone standard. Union County, New Jersey is in attainment for all other National Ambient Air Quality Standards, including fine particulates, sulfur dioxide, carbon monoxide, nitrogen dioxide, and lead.

Based on the netting analysis for this project, which is described in Section VI, the increase in potential VOC emissions is below 25 tpy and, therefore, is not defined as a significant net increase according to NJAC 7:27-18.7 Table 3. Therefore, the project is not expected to have a significant impact on the attainment status for ozone. The facility will comply with NJAC 7:27 in accordance with the air operating permit for the facility, including, but not limited to, compliance with the following requirements:

- Submittal of Annual Compliance Certification
- Submittal of Semi-Annual deviation report
- Compliance with the QA/QC plan for the Continuous Emission Monitoring System (CEMS), including completion of required Cylinder Gas Audit (CGA) and Relative Accuracy Test Audit (RATA) testing and submittal of quarterly Excess Emissions Reports (EERs)
- Emission calculations for in-service roof landings each month during operation for U3, U9, U2, U8, and U1
- Calculations of PVCU emissions for degassing, cleaning and sludge removal each month of operation
- Stack Testing in accordance with permit requirements

Table 6. Ambient Air Quality Data from Nearby Monitoring Sites.

	Elizabeth Station			Elizabeth Lab Station			Rahway			Bayonne			Newark Firehouse*		
Pollutant	**2021**	**2022**	**2023**	**2021**	**2022**	**2023**	**2021**	**2022**	**2023**	**2021**	**2022**	**2023**	**2021**	**2022**	**2023**
Ozone															
1-Hour Daily Maximum (ppm)										0.092	0.085	0.104	0.087	0.089	
Highest Daily Maximum (8-hr average) (ppm)										0.078	0.075	0.096	0.072	0.069	
4th Highest Daily Maximum (8-hr Average) (ppm)										0.07	0.065	0.083	0.066	0.063	
Particulate Matter (PM2.5 Continuous Monitors)															
Annual Average (µg/m^3)				9.56	9.5	11.7	7.53	6.8	9.2				8.79	8	
Highest 24-hour Average (µg/m^3)				28.4	26	151.5	46.1	22.7	150.5				45.1	22.3	
98th Percentile (µg/m^3)				21	18.2	31.4	18.8	14.9	28.7				23.3	16.5	
Nitrogen Dioxide															
Daily Maximum, 1 hour average (ppb)				84	79	75				69	97	66	57	61	
98th Percentile (ppb)				65	63	59				56	52	50	53	56	
Sulfur Dioxide															
Highest Daily Maximum, 1 hr average (ppb)	5.3	4.1	7.3	6.9	8.8	6.8				4.7	5.5	3	8.5	4.1	
2nd Highest Daily Maximum, 1 hr average (ppb)	3.5	3.5	4.2	5.2	5.2	5.3				3.3	3.5	2.2	3.1	3.1	
99th Percentile Daily Maximum, 1 hr average (ppb)	3.2	3	4	4.5	5	5				2.8	3	3	2	3	
Carbon Monoxide															
Highest 1 hour average concentration (ppm)	2.6	2.1	2.3	1.8	2.2	2.4							3.072	2.424	
2nd highest 1 hour average concentration (ppm)	2.5	2	2.1	1.8	2.2	2.2							2.987	1.951	
Highest 8 hour average concentration (ppm)	2.3	1.7	1.6	1.3	1.5	1.5							2.3	1.4	
2nd Highest 8 hour average concentration (ppm)	2.2	1.5	1.5	1.3	1.4	1.4							1.9	1.3	
Lead															
Highest 3 month rolling average (µg/m^3)													0.003	0.003	

* = Newark Firehouse was shut down 9/26/2022
Data Not Available for this Station

Subsurface Hydrology

According to the RAWP (Arcadis 2024), the facility is located within the Rahway River drainage basin. Two hydrostratigraphic units have been identified at the site: an unconfined surficial aquifer within the overburden and a semi-confined aquifer in the Passaic Formation bedrock.

Overburden at the site is composed of structural backfill materials and native red-brown clayey and sandy silt. Groundwater generally occurs at depths ranging from approximately 1 to 10 feet below ground surface (bgs). Overburden groundwater at the site flows to the south and east toward an Unnamed Tributary and the Rahway River.

Bedrock is observed at depths of approximately 21 feet bgs in the northern portion of the site and range from approximately 25 feet bgs to a maximum depth of approximately 40 feet bgs in the southern portion of the site. Shallow bedrock groundwater flows primarily to the Rahway River to the southwest, south, and southeast and to the Arthur Kill and smaller local drainage features to the east and northeast.

Local Climate and Flooding Impacts

As discussed in Section VI, a flood indicator report for the Facility was obtained from New Jersey's Climate Change website and is included in Attachment 3. The flood map is also provided in Figure 3.

The majority of Facility is within the Federal Emergency Management Agency (FEMA) effective 500-year flood zone with an annual flood hazard of 0.2 percent, with part of the eastern area of the facility in the 1% annual flood hazard zone. There are two regulatory floodways and no special floodways within the Facility.

No flooding impacts (including potential sea level rise) are expected from the project.

The nearest NOAA stations to the facility with monthly precipitation are Linden 2.2 NW and Newark Liberty International Airport. The nearest NOAA station to the facility with monthly average temperatures is Newark Liberty International Airport. Monthly average temperatures and precipitation data for these stations for the period from 2021 to 2024 are provided in Attachment 7.

Figure 3. Flood Map.

Traffic Study

Approximately 70 to 100 trucks, four employee vehicles, and up to three contractor vehicles access the facility each day. Trucks can only access the facility by Marshes Dock Rd and enter from either the western or eastern sides of Lower Rd. Traffic onto Lower Rd in both directions is from Route US 1/9. A map is provided in Attachment 8 that illustrates the truck routes. The peak hours for traffic are between 6 am and 4 pm, with additional peak truck traffic at the loading rack between 5 am and 9 am and again between 11 am and 1 pm. Traffic on Marshes Dock Rd which also includes concrete and dump trucks for Weldon Concrete & Asphalt located at the end of Marshes Dock Rd, beyond the Facility. There will be no impact to traffic flow patterns, transportation routes, or the number of trucks and employee/ contractor vehicles as a result of this project.

Sewage and Stormwater

The Linden facility is serviced by the Linden Roselle Sewerage Authority (LSRA).The LSRA sewage treatment is a biological system designed to treat 17 million gallons per day. The system consists of primary sedimentation, activated sludge, secondary clarifiers and ultraviolet disinfection for final effluent. Sludge treatment is by gravity thickening of primary sludge and gravity belt thickening for waste activated sludge, followed by anaerobic digestion. The LSRA discharges wastewater to the Arthur Kill under NJDEP Permit No. 0024953. The City of Linden does not have a CSO.

This project does not involve any physical modifications, and there will be no impacts to the sewage system.

The facility operates under NJPDES Permit #NJ0000311 and maintains a Stormwater Pollution Prevention Plan (SWPPP) in accordance with applicable regulations and NJDEP guidance. This SWPPP addresses potential pollutant sources and Best Management Practices (BMPs) in place at the facility to minimize the potential for adverse impacts to stormwater from facility operations.

There will be no impact to stormwater as a result of this project.

Water Supply System

The facility is serviced by NJ American Water within the Raritan Service Area, PWS ID: NJ2004002. The Raritan Service Area water system is a public community water system obtaining water from the following sources:

- Surface water: Millstone River, Raritan River, and Delaware & Raritan Canal
- Aquifers: Brunswick, Stockton, Basalt, Passaic, and Glacial Drift

The average amount of water supplied to customers on a daily basis is 126 million gallons based on the 2024 Annual Water Quality Report for the Raritan System.

There are no physical changes as a result of this project, and, therefore, demand on the water supply system will not be impacted.

Energy Supply System

The current electrical load of the facility is approximately 39,000 kW-hr per month. There are no physical changes as a result of this project so there will be no impact on electrical demand. There is no significant roof or land capacity available to support the use of onsite renewable energy resources.

IX. Supplemental Information for Expanded Facilities

This project is classified as a facility expansion due to the increase in potential emissions in the PTE. The supplemental information required for expanded facilities as outlined in N.J.A.C. 7:1C-6 is provided in the following sections.

Comparison of Reasonable Design Alternatives

The project is intended to modify the PTE for the facility and correct conditions in the current Title V permit. Since the project does not include the installation of equipment or structures or significant changes to site operations, there is no opportunity to consider reasonable design alternatives. Most of the corrections are for operations that were already being conducted under the previous owner and are continuing under Global. For example, vapor pressure assumptions did not include the variation in the vapor pressure of gasoline, which is stored and distributed by

the terminal. In addition, the permit included vacuum assisted loading, which is not in place at the loading rack. As a result, the PTE calculations underestimated loading emissions and were corrected under this Application. Though there is an increase in potential emissions associated with this project, as outlined in the analysis of environmental and public health stressors in Section VI, there are no significant impacts to environmental and public health stressors that would reasonably result from the projector alternatives considered. There is no opportunity to consider no action, since there is no significant change to future operations. Based on these criteria, correcting the errors in the permit and associated emissions calculations to be consistent with Facility operations is the preferred alternative.

Odor, Dust and Noise Mitigation

This project would not result in any physical changes so odor, dust and/or noise mitigation is not applicable to this project.

Detailed Compliance History

A list of existing DEP permits at the facility is provided in Table 2. A table summarizing enforcement actions from the past five years at the facility, based on information from EJMAP, is provided in Table 6 in Attachment 9. Enforcement actions from the past five years at the facility were from before Global acquired the facility.

Feasible Control Measures

The change to operations is taking place within the Facility's existing footprint and there is no change to traffic or significant impact on other stressors in the community. A Localized Impact Control Technology (LICT) demonstration was completed for the Facility in accordance with N.J.A.C. 7:1C-7.1. This demonstration is summarized in the following section and provided in Attachment 10.

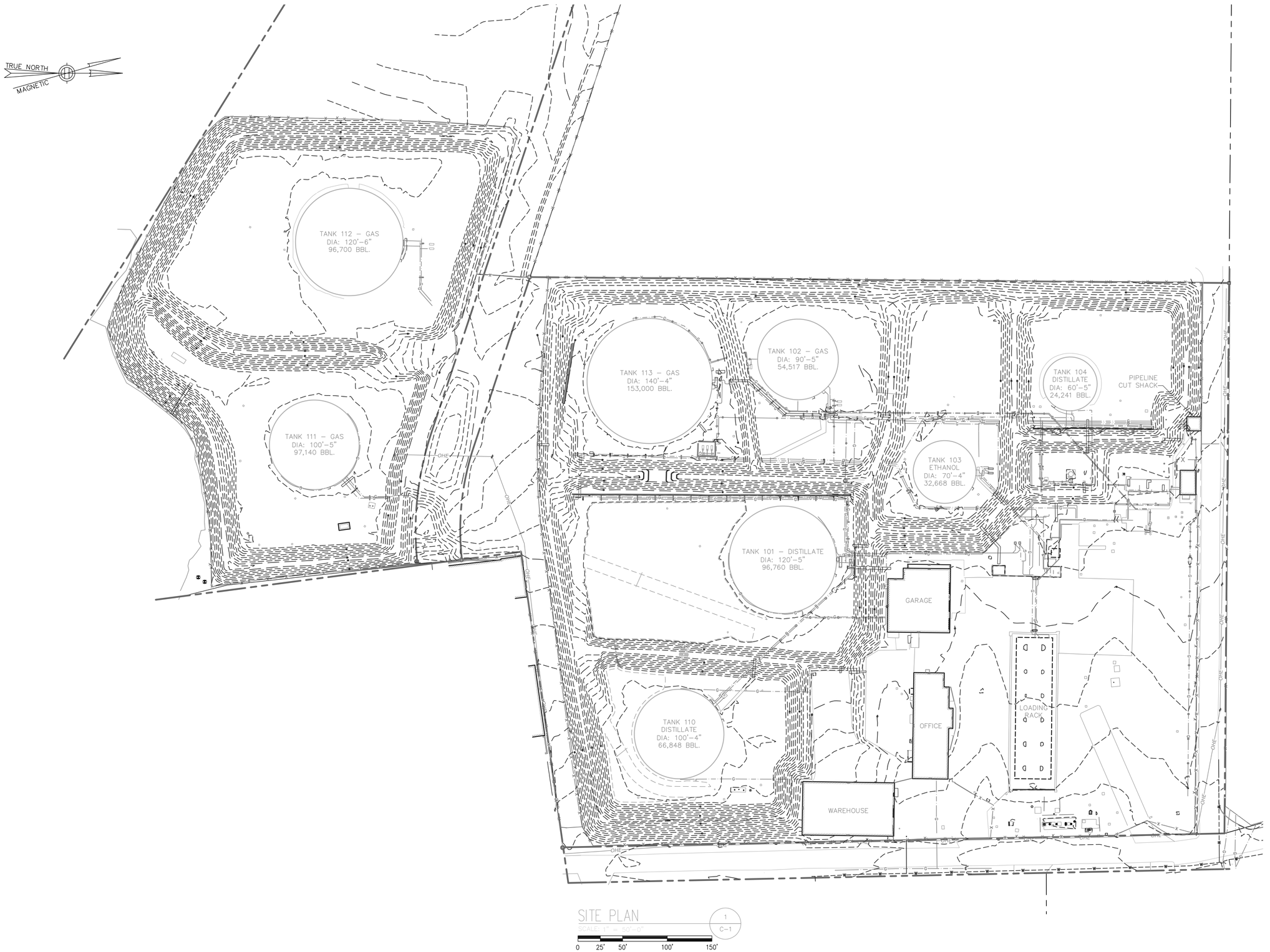
Localized Impact Control Technology (LICT)

A Localized Impact Control Technology (LICT analysis has been completed for the Facility in accordance with N.J.A.C. 7:1C-7.1. Internal Floating Roofs for higher vapor pressure product storage and a VRU for truck loading are demonstrated LICT for this Facility. The LICT demonstration is included as Attachment 10.

X. References

Arcadis. 2024. Remedial Action Work Plan for Former Gulf Oil Terminal. NJDEP SRP PI No. 006342. February 2024.

Attachment 1 – Facility Site Plan



SITE PLAN
SCALE: 1" = 50'-0"
1
C-1

GLOBAL PARTNERS
Putting Our Energy to Work

GLOBAL COMPANIES, LLC
800 SOUTH STREET
SUITE 500
WALTHAM, MA 02453

REVISIONS

REV. #	DATE	DESCRIPTION
2	6/7/2024	SITE PLAN
1	10/3/2018	SITE PLAN
0	04/13/2015	ISSUED FOR REVIEW

SITE NAME:

LINDEN

SITE ADDRESS:

2600 MARSHES DOCK ROAD
LINDEN, NJ 07036

DRAWING TITLE:

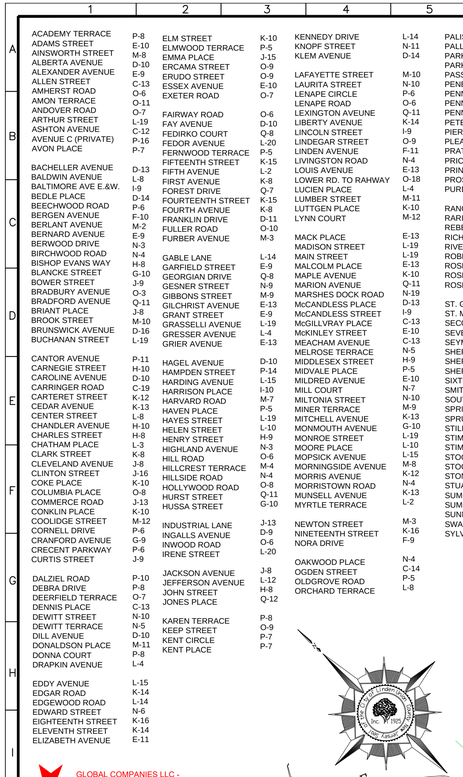
SITE PLAN

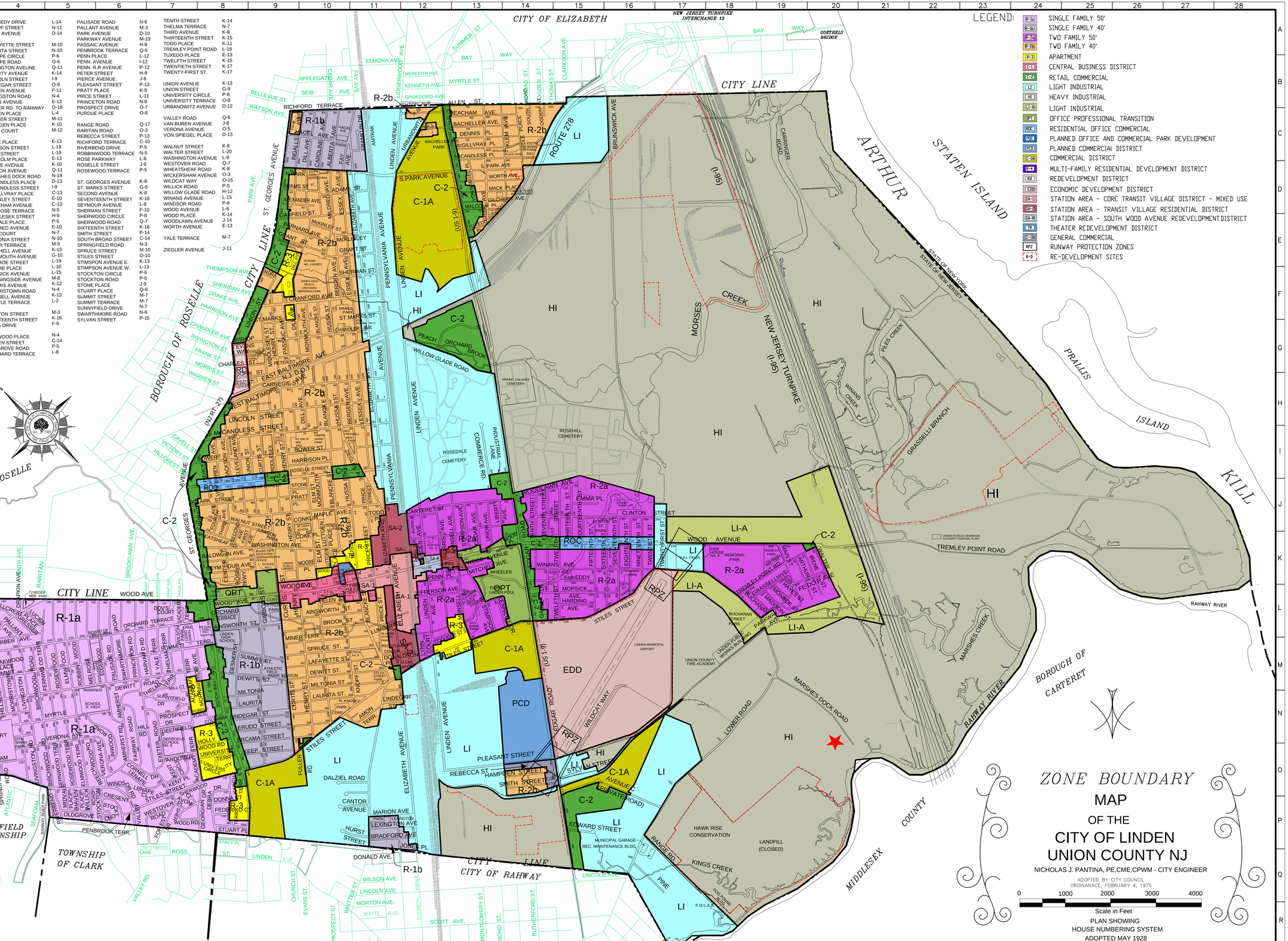
DRAWING NO:

C-1

ORIGINAL ISSUE DATE:	PROJECT NO:	DESIGNED BY: DKJ
04/13/2015	1006.01	DRAWN BY: DKJ
		CHECK'D BY: TK

Attachment 2 – City of Linden Zoning Map





ACADEMY TERRACE	P-8
ADAMS STREET	E-10
AINSWORTH STREET	M-8
ALBERTA AVENUE	D-10
ALEXANDER AVENUE	E-9
ALLEN STREET	C-13
AMHERST ROAD	O-6
AMON TERRACE	O-11
ANDOVER ROAD	O-7
ARTHUR STREET	L-19
ASHTON AVENUE	C-12
AVENUE C (PRIVATE)	P-16
AVON PLACE	P-7
BACHELLER AVENUE	D-13
BALDWIN AVENUE	L-8
BALTIMORE AVE E.&W.	I-9
BEDLE PLACE	D-14
BEECHWOOD ROAD	P-6
BERGEN AVENUE	F-10
BERLANT AVENUE	M-2
BERNARD AVENUE	E-9
BERWOOD DRIVE	N-3
BIRCHWOOD ROAD	N-4
BISHOP EVANS WAY	H-8
BLANCKE STREET	G-10
BOWER STREET	J-9
BRADBURY AVENUE	O-3
BRADFORD AVENUE	Q-11
BRIANT PLACE	J-8
BROOK STREET	M-10
BRUNSWICK AVENUE	D-16
BUCHANAN STREET	L-19
CANTOR AVENUE	P-11
CARNEGIE STREET	H-10
CAROLINE AVENUE	D-10
CARRINGER ROAD	C-19
CARTERET STREET	K-12
CEDAR AVENUE	K-13
CENTER STREET	L-8
CHANDLER AVENUE	H-10
CHARLES STREET	H-8
CHATHAM PLACE	L-3
CLARK STREET	K-8
CLEVELAND AVENUE	J-8
CLINTON STREET	J-16
COKE PLACE	K-10
COLUMBIA PLACE	O-8
COMMERCE ROAD	J-13
CONKLIN PLACE	K-10
COOLIDGE STREET	M-12
CORNELL DRIVE	P-6
CRANFORD AVENUE	G-9
CRECENT PARKWAY	P-6
CURTIS STREET	J-9
DALZIEL ROAD	P-10
DEBRA DRIVE	P-8
DEERFIELD TERRACE	O-7
DENNIS PLACE	C-13
DEWITT STREET	N-10
DEWITT TERRACE	N-5
DILL AVENUE	D-10
DONALDSON PLACE	M-11
DONNA COURT	P-8
DRAPKIN AVENUE	L-4
EDDY AVENUE	L-15
EDGAR ROAD	K-14
EDGEWOOD ROAD	L-14
EDWARD STREET	N-6
EIGHTEENTH STREET	K-16
ELEVENTH STREET	K-14
ELIZABETH AVENUE	E-11
ELM STREET	K-10
ELMWOOD TERRACE	P-5
EMMA PLACE	J-15
ERCAMA STREET	O-9
ERUDO STREET	O-9
ESSEX AVENUE	E-10
EXETER ROAD	O-7
FAIRWAY ROAD	O-6
FAY AVENUE	D-10
FEDIRKO COURT	Q-8
FEDOR AVENUE	L-20
FERNWOOD TERRACE	P-5
FIFTEENTH STREET	K-15
FIFTH AVENUE	L-2
FIRST AVENUE	K-8
FOREST DRIVE	Q-7
FOURTEENTH STREET	K-15
FOURTH AVENUE	K-8
FRANKLIN DRIVE	D-11
FULLER ROAD	O-10
FURBER AVENUE	M-3
GABLE LANE	L-14
GARFIELD STREET	E-9
GEORGIAN DRIVE	Q-8
GESNER STREET	N-9
GIBBONS STREET	M-9
GILCHRIST AVENUE	E-13
GRANT STREET	E-9
GRASSELLI AVENUE	L-19
GRESSER AVENUE	L-4
GRIER AVENUE	E-13
HAGEL AVENUE	D-10
HAMPDEN STREET	P-14
HARDING AVENUE	L-15
HARRISON PLACE	I-10
HARVARD ROAD	M-7
HAVEN PLACE	P-5
HAYES STREET	L-19
HELEN STREET	L-10
HENRY STREET	H-9
HIGHLAND AVENUE	N-3
HILL ROAD	O-6
HILLCREST TERRACE	M-4
HILLSIDE ROAD	N-4
HOLLYWOOD ROAD	O-8
HURST STREET	Q-11
HUSSA STREET	G-10
INDUSTRIAL LANE	J-13
INGALLS AVENUE	D-9
INWOOD ROAD	O-6
IRENE STREET	L-20
JACKSON AVENUE	J-8
JEFFERSON AVENUE	L-12
JOHN STREET	H-8
JONES PLACE	Q-12
KAREN TERRACE	P-8
KEEP STREET	O-9
KENT CIRCLE	P-7
KENT PLACE	P-7
KENNEDY DRIVE	L-14
KNOPF STREET	N-11
KLEM AVENUE	D-14
LAFAYETTE STREET	M-10
LAURITA STREET	N-10
LENAPE CIRCLE	P-6
LENAPE ROAD	O-6
LEXINGTON AVEUNE	Q-11
LIBERTY AVENUE	K-14
LINCOLN STREET	I-9
LINDEGAR STREET	O-9
LINDEN AVENUE	F-11
LIVINGSTON ROAD	N-4
LOUIS AVENUE	E-13
LOWER RD. TO RAHWAY	O-18
LUCIEN PLACE	L-4
LUMBER STREET	M-11
LUTTGEN PLACE	K-10
LYNN COURT	M-12
MACK PLACE	E-13
MADISON STREET	L-19
MAIN STREET	L-19
MALCOLM PLACE	E-13
MAPLE AVENUE	K-10
MARION AVENUE	Q-11
MARSHES DOCK ROAD	N-19
McCANDLESS PLACE	D-13
McCANDLESS STREET	I-9
McGILLVRAY PLACE	C-13
McKINLEY STREET	E-10
MEACHAM AVENUE	C-13
MELROSE TERRACE	N-5
MIDDLESEX STREET	H-9
MIDVALE PLACE	P-5
MILDRED AVENUE	E-10
MILL COURT	N-7
MILTONIA STREET	N-10
MINER TERRACE	M-9
MITCHELL AVENUE	K-13
MONMOUTH AVENUE	G-10
MONROE STREET	L-19
MOORE PLACE	L-10
MOPSICK AVENUE	L-15
MORNINGSIDE AVENUE	M-8
MORRIS AVENUE	K-12
MORRISTOWN ROAD	N-4
MUNSELL AVENUE	K-13
MYRTLE TERRACE	L-2
NEWTON STREET	M-3
NINETEENTH STREET	K-16
NORA DRIVE	F-9
OAKWOOD PLACE	N-4
OGDEN STREET	C-14
OLDGROVE ROAD	P-5
ORCHARD TERRACE	L-8
PALISADE ROAD	N-6
PALLANT AVENUE	M-3
PARK AVENUE	D-10
PARKWAY AVENUE	M-19
PASSAIC AVENUE	H-9
PENBROOK TERRACE	Q-6
PENN PLACE	L-12
PENN. AVENUE	I-12
PENN. R.R AVENUE	P-12
PETER STREET	H-9
PIERCE AVENUE	J-8
PLEASANT STREET	P-13
PRATT PLACE	K-9
PRICE STREET	L-11
PRINCETON ROAD	N-6
PROSPECT DRIVE	O-7
PURDUE PLACE	O-8
RANGE ROAD	Q-17
RARITAN ROAD	O-3
REBECCA STREET	P-13
RICHFORD TERRACE	C-10
RIVERBEND DRIVE	P-5
ROBBINWOOD TERRACE	N-5
ROSE PARKWAY	L-8
ROSELLE STREET	J-9
ROSEWOOD TERRACE	P-5
ST. GEORGES AVENUE	K-8
ST. MARKS STREET	G-9
SECOND AVENUE	K-8
SEVENTEENTH STREET	K-16
SEYMOUR AVENUE	L-8
SHERMAN STREET	F-10
SHERWOOD CIRCLE	P-8
SHERWOOD ROAD	Q-7
SIXTEENTH STREET	K-16
SMITH STREET	P-14
SOUTH BROAD STREET	C-14
SPRINGFIELD ROAD	N-3
SPRUCE STREET	M-10
STILES STREET	O-10
STIMSPON AVENUE E.	K-13
STIMPSON AVENUE W.	L-13
STOCKTON CIRCLE	P-6
STOCKTON ROAD	P-6
STONE PLACE	J-9
STUART PLACE	Q-8
SUMMIT STREET	M-7
SUMMIT TERRACE	M-7
SUNNYFIELD DRIVE	N-7
SWARTHMORE ROAD	N-6
SYLVAN STREET	P-15
TENTH STREET	K-14
THELMA TERRACE	N-7
THIRD AVENUE	K-8
THIRTEENTH STREET	K-15
TODD PLACE	K-11
TREMLEY POINT ROAD	L-19
TUXEDO PLACE	E-13
TWELFTH STREET	K-15
TWENTIETH STREET	K-17
TWENTY-FIRST ST.	K-17
UNION AVENUE	K-13
UNION STREET	G-9
UNIVERSITY CIRCLE	P-8
UNIVERSITY TERRACE	O-8
URBANOWITZ AVENUE	D-12
VALLEY ROAD	Q-6
VAN BUREN AVENUE	J-8
VERONA AVENUE	O-5
VON SPIEGEL PLACE	D-13
WALNUT STREET	K-8
WALTER STREET	L-20
WASHINGTON AVENUE	L-9
WESTOVER ROAD	Q-7
WHEATSHEAF ROAD	K-8
WICKERSHAM AVENUE	O-3
WILDCAT WAY	O-15
WILLICK ROAD	P-5
WILLOW GLADE ROAD	H-12
WINANS AVENUE	L-15
WINDSOR ROAD	P-6
WOOD AVENUE	L-6
WOOD PLACE	K-14
WOODLAWN AVENUE	J-14
WORTH AVENUE	E-13
YALE TERRACE	M-7
ZIEGLER AVENUE	J-11

GLOBAL COMPANIES LLC -
LINDEN TERMINAL
2600 MARSHES DOCK RD LINDEN, NJ
UNION COUNTY

LEGEND:

R-1a	SINGLE FAMILY 50′
R-1b	SINGLE FAMILY 40′
R-2a	TWO FAMILY 50′
R-2b	TWO FAMILY 40′
R-3	APARTMENT
C-1	CENTRAL BUSINESS DISTRICT
C-2	RETAIL COMMERCIAL
LI	LIGHT INDUSTRIAL
HI	HEAVY INDUSTRIAL
LI-A	LIGHT INDUSTRIAL
OPT	OFFICE PROFESSIONAL TRANSITION
ROC	RESIDENTIAL OFFICE COMMERCIAL
POC	PLANNED OFFICE AND COMMERCIAL PARK DEVELOPMENT
PCD	PLANNED COMMERCIAL DISTRICT
C-1A	COMMERCIAL DISTRICT
R-4	MULTI-FAMILY RESIDENTIAL DEVELOPMENT DISTRICT
RD	REDEVELOPMENT DISTRICT
EDD	ECONOMIC DEVELOPMENT DISTRICT
SA-1	STATION AREA - CORE TRANSIT VILLAGE DISTRICT - MIXED USE
SA-2	STATION AREA - TRANSIT VILLAGE RESIDENTIAL DISTRICT
SA-R	STATION AREA - SOUTH WOOD AVENUE REDEVELOPMENT DISTRICT
TR	THEATER REDEVELOPMENT DISTRICT
C-1B	GENERAL COMMERCIAL
RPZ	RUNWAY PROTECTION ZONES
R-D	RE-DEVELOPMENT SITES

ZONE BOUNDARY
MAP
OF THE
CITY OF LINDEN
UNION COUNTY NJ

NICHOLAS J. PANTINA, PE,CME,CPWM - CITY ENGINEER

ADOPTED BY CITY COUNCIL
ORDINANACE, FEBRUARY 4, 1975

0 1000 2000 3000 4000
Scale in Feet

PLAN SHOWING
HOUSE NUMBERING SYSTEM
ADOPTED MAY 1928

1	5/5/2016	LINDEN_ZONING_.PDF Updated Street.dwg	
2	7/25/2016	REMOVED C-L ON ELIZABETH/ REMOVED P.R.O. ORD. 60-30	SB
3	10/28/2016	REVISION OF ZONING BOUNDARIES	SB
4	2/21/2017	ZONING BOUNDARIES (INCLUDED RPZ ZONE ORD. 58-72)	SB
5	5/22/2019	ZONING BOUNDARIES (INCLUDED RE-DEVELOPMENT SITES)	SB
6	2/10/2020	REVISED ZONING BOUNDARIES (ORD #64-10	SB
7	9/20/2023	REVISED ZONING BOUNDARIES (ORD #67-58	SB

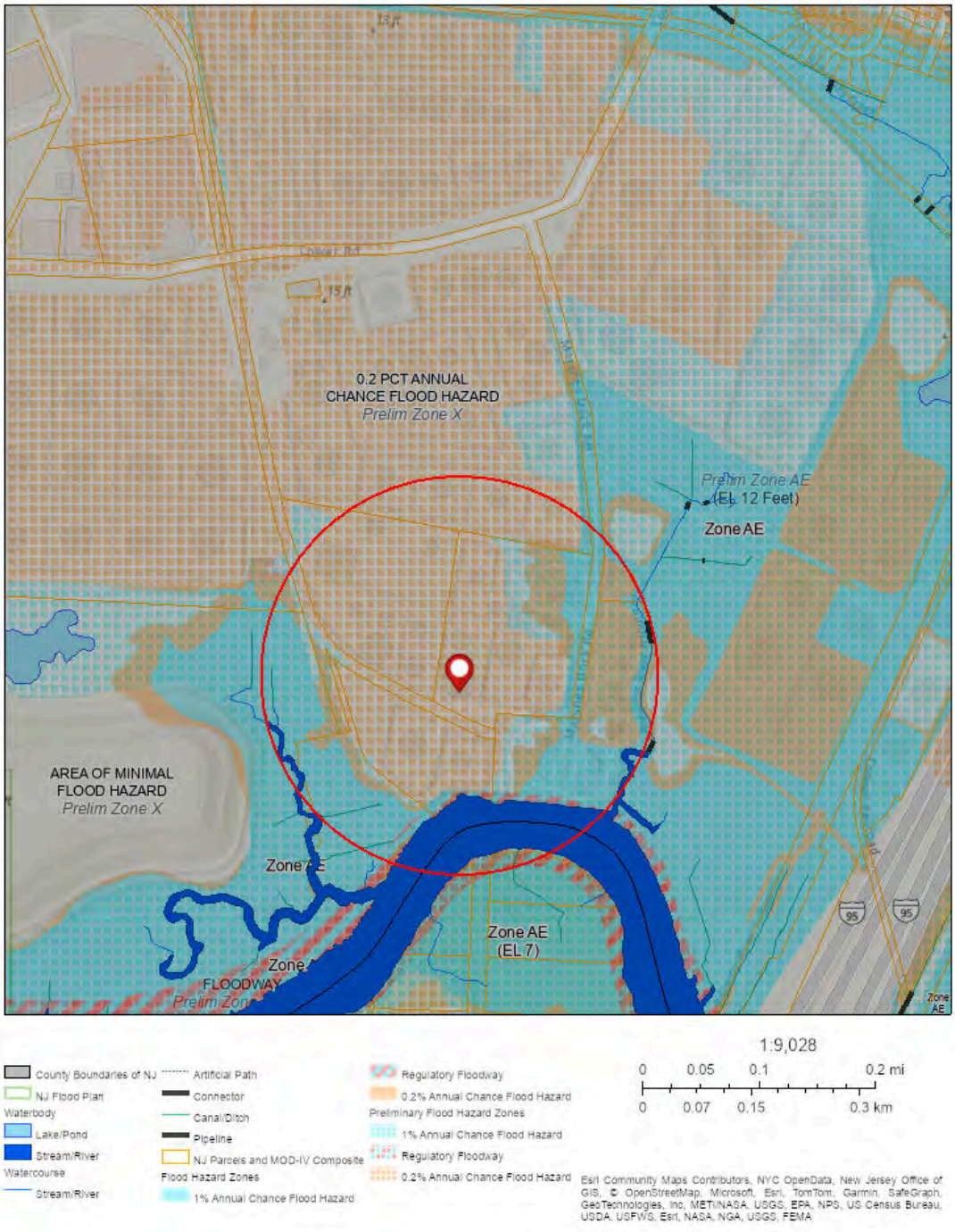
Attachment 3 – Flood Indicator Report

Flood Indicator Report

Area of Interest (AOI) Information

Area : 2,538,952.09 ft²

Feb 20 2025 11:18:59 Eastern Standard Time



Summary

Name	Count	Area(ft²)	Length(ft)
FEMA Flood Zones	0	0	N/A
FEMA Preliminary Flood Zones	6	2,538,952.19	N/A
Watercourses	16	N/A	3,084.28
Waterbodies	1	204,026.10	N/A
NJ Flood Plan	0	0	N/A
NJ Flood Elevation Profile	0	N/A	0
Tidal Climate Adjusted Flood Elevation (CAFE)	17	1,855,994.44	N/A

FEMA Preliminary Flood Zones

#	DFIRM_ID	FLD_ZONE	ZONE_SUBTY	Area(ft²)
1	34023C	AE	*No Data*	0.11
2	34023C	AE	FLOODWAY	110,117.45
3	34039C	AE	FLOODWAY	146,255.87
4	34039C	AE	*No Data*	1,043,691.00
5	34039C	X	0.2 PCT ANNUAL CHANCE FLOOD HAZARD	1,238,887.76

Watercourses

#	Stream Name	Length(ft)
1	Rahway River	814.21
2	Rahway River tributary	2,270.07

Waterbodies

#	Waterbody Name	Area(ft²)
1	*No Data*	204,026.10

Tidal Climate Adjusted Flood Elevation (CAFE)

#	Flood Zone	Area(ft²)
1	FW	256,388.36
2	AE	553,852.05
3	SLR 5FT	1,045,754.03

The presence of flood indicators means this property has the potential to flood during the 100-yr and 500-yr flood. The 100-yr pertains to the probability of experiencing a flood so great that it has less than a 1% chance of occurring in any given year. Over the life of a typical mortgage, 30 years, the 100-yr storm flood has a 26% chance of occurring. The 500-year flood refers to the level of flooding that has a 0.2% probability of occurring in any given year. It is important to remember that a flood has an equal chance of occurring every year, regardless of whether it has occurred recently.

This report does not identify actual flood risk. To learn more about the flood indicators, click "Understanding the Flood Indicator Report".

Attachment 4 – Draft Public Notice Sign

Figure 4 Proposed Sign Location

Global Companies LLC – Linden Terminal

2600 Marshes Dock Road

Linden, New Jersey

EJ Project ID: 35778569

Permit Activity Number: BOP240002

PUBLIC NOTICE

This public notice is for Global Companies LLC (Global), located at 2600 Marshes Dock Road, Union County, New Jersey, who submitted an application to the New Jersey Department of Environmental Protection (NJDEP) for a modification to the facility's Title V air permit on June 27, 2024. The facility currently operates under a Title V Operating Permit for Program Interest No. 41801 and Permit Activity No. BOP240001 issued on July 26, 2001. The modification would update permit conditions and emissions limits. The facility's location has been identified as part of an overburdened community (OBC) pursuant to NJSA 13:1D-157.

The Facility is an existing bulk petroleum storage and transfer terminal. After obtaining ownership of the Facility from Gulf Oil Limited Partnership (Gulf) in April 2024, updated Potential to Emit (PTE) calculations were submitted to NJDEP via a permit modification (the Application). The permit modification was to correct the previous permit and to conform to current EPA AP-42 emission calculation methods. No actual physical changes are proposed to operations. In accordance with N.J.A.C. 7:1C, an Environmental Justice Impact Statement (EJIS) was submitted for the project. The EJIS evaluates the potential impact of the modification on environmental and public health stressors in the community. Though there is an increase in potential emissions from the modification, no actual physical changes are proposed and actual emissions will not change as a result of the modification. The modification is not expected to have a significant impact on or contribute to the identified adverse stressors in the community.

In accordance with N.J. Admin. Code § 7:1C-4.2, Global intends to hold an in-person Public Information Session from 6PM to 8PM on Date to Be Determined (TBD) at the Linden Public Library. There will also be an option to participate virtually via webinar. The web address and information for participating in the virtual public information session can be obtained by emailing tkeefe@globalp.com. Copies of the application are available at the Linden City Clerk's office located at 301 North Wood Avenue #1, Linden, New Jersey 07036 and the Linden Public Library located at 31 East Henry Street, Linden, New Jersey 07036. The EJIS can be accessed at [LINK TO EJIS TO BE INSERTED WHEN AVAILABLE].

The facility encourages public participation from interested parties either through attendance at the public information session, or by submitting written comments to tkeefe@globalp.com. The facility encourages these comments to include information regarding existing environmental and public health stressors that could result in adverse impacts on the affected community. This notice opens the initial minimum 60-day comment period for this project. The comment period begins on Date TBD and concludes on Date TBD.

Each written comment must contain the following:

- Name, address, and telephone number (and email address) of the person submitting the comments.
- Identification of Program Interest Number: 41801 or facility name (Global Companies LLC – Linden Terminal).

Global Companies LLC – Linden Terminal

2600 Marshes Dock Road

Linden, New Jersey

EJ Project ID: 35778569

Permit Activity Number: BOP240002

AVISO PÚBLICO

Este aviso público está dirigido a Global Companies LLC (Global), ubicada en 2600 Marshes Dock Road, Condado de Union, Nueva Jersey, quien presentó una solicitud al Departamento de Protección Ambiental de Nueva Jersey (NJDEP) para una modificación del permiso de aire del Título V de la instalación el 27 de junio de 2024. La instalación actualmente opera bajo un Permiso de Operación del Título V para el Interés del Programa n.º 41801 y un Permiso de Actividad n.º BOP240001, emitido el 26 de julio de 2001. La modificación actualizaría las condiciones del permiso y los límites de emisiones. La ubicación de la instalación ha sido identificada como parte de una comunidad sobrecargada (OBC) de conformidad con la norma NJSA 13:1D-157.

La Instalación es una terminal existente de almacenamiento y transferencia de petróleo a granel. Tras obtener la propiedad de la Instalación de Gulf Oil Limited Partnership (Gulf) en abril de 2024, se presentaron al NJDEP los cálculos actualizados del Potencial de Emisión (PTE) mediante una modificación del permiso (la Solicitud). La modificación del permiso tuvo como objetivo corregir el permiso anterior y cumplir con los métodos actuales de cálculo de emisiones AP-42 de la EPA. No se proponen cambios físicos reales en las operaciones. De conformidad con el N.J.A.C. 7:1C, se presentó una Declaración de Impacto de Justicia Ambiental (EJIS) para el proyecto. La EJIS evalúa el impacto potencial de la modificación sobre los factores de estrés ambiental y de salud pública en la comunidad. Si bien la modificación implica un aumento en las emisiones potenciales, no se proponen cambios físicos reales y las emisiones reales no cambiarán como resultado de la modificación. No se espera que la modificación tenga un impacto significativo ni contribuya a los factores de estrés adversos identificados en la comunidad.

De conformidad con el Código Administrativo de Nueva Jersey, artículo 7:1C-4.2, Global tiene la intención de celebrar una sesión informativa pública presencial de 18:00 a 20:00 h en una fecha por determinar (TBD) en la Biblioteca Pública de Linden. También se podrá participar virtualmente mediante un seminario web. La dirección web y la información para participar en la sesión informativa pública virtual se pueden obtener enviando un correo electrónico a tkeefe@globalp.com. Se pueden obtener copias de la solicitud en la oficina del Secretario Municipal de Linden, ubicada en 301 North Wood Avenue #1, Linden, Nueva Jersey 07036, y en la Biblioteca Pública de Linden, ubicada en 31 East Henry Street, Linden, Nueva Jersey 07036. Se puede acceder al EJIS en [LINK A EJIS SE INSERTARÁ CUANDO ESTÉ DISPONIBLE].

El centro fomenta la participación pública de las partes interesadas, ya sea asistiendo a la sesión informativa pública o enviando comentarios por escrito a tkeefe@globalp.com. El centro recomienda que estos comentarios incluyan información sobre los factores de estrés ambiental y de salud pública existentes que podrían tener impactos adversos en la comunidad afectada. Este aviso abre el plazo mínimo inicial de 60 días para presentar comentarios sobre este proyecto. El plazo comienza en la fecha a determinar y concluye en la fecha a determinar.

Cada comentario por escrito debe contener lo siguiente:

- Nombre, dirección y número de teléfono (y correo electrónico) de la persona que envía los comentarios.
- Número de identificación del interesado en el programa: 41801 o nombre de la instalación (Global Companies LLC – Linden Terminal).

Attachment 5 – Public Notice

PUBLIC NOTICE

Global Companies LLC – Linden Terminal
2600 Marshes Dock Road
Linden, New Jersey
EJ Project ID: 35778569
Permit Activity Number: BOP240002

This public notice is for Global Companies LLC (Global), located at 2600 Marshes Dock Road, Union County, New Jersey, who submitted an application to the New Jersey Department of Environmental Protection (NJDEP) for a modification to the facility's Title V air permit on June 27, 2024. The facility currently operates under a Title V Operating Permit for Program Interest No. 41801 and Permit Activity No. BOP240001 issued on July 26, 2001. The modification would update permit conditions and emissions limits. The facility's location has been identified as part of an overburdened community (OBC) pursuant to NJSA 13:1D-157.

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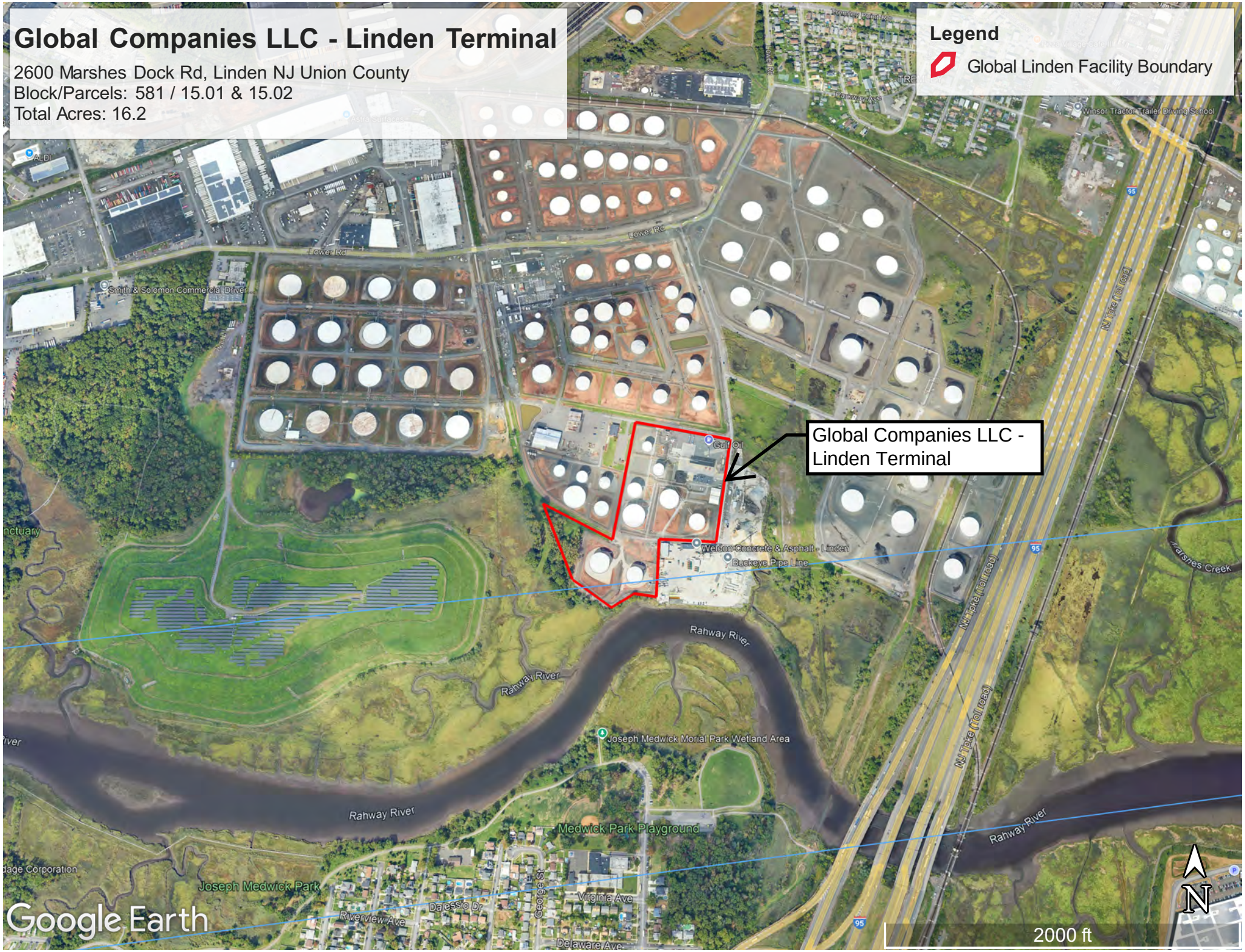
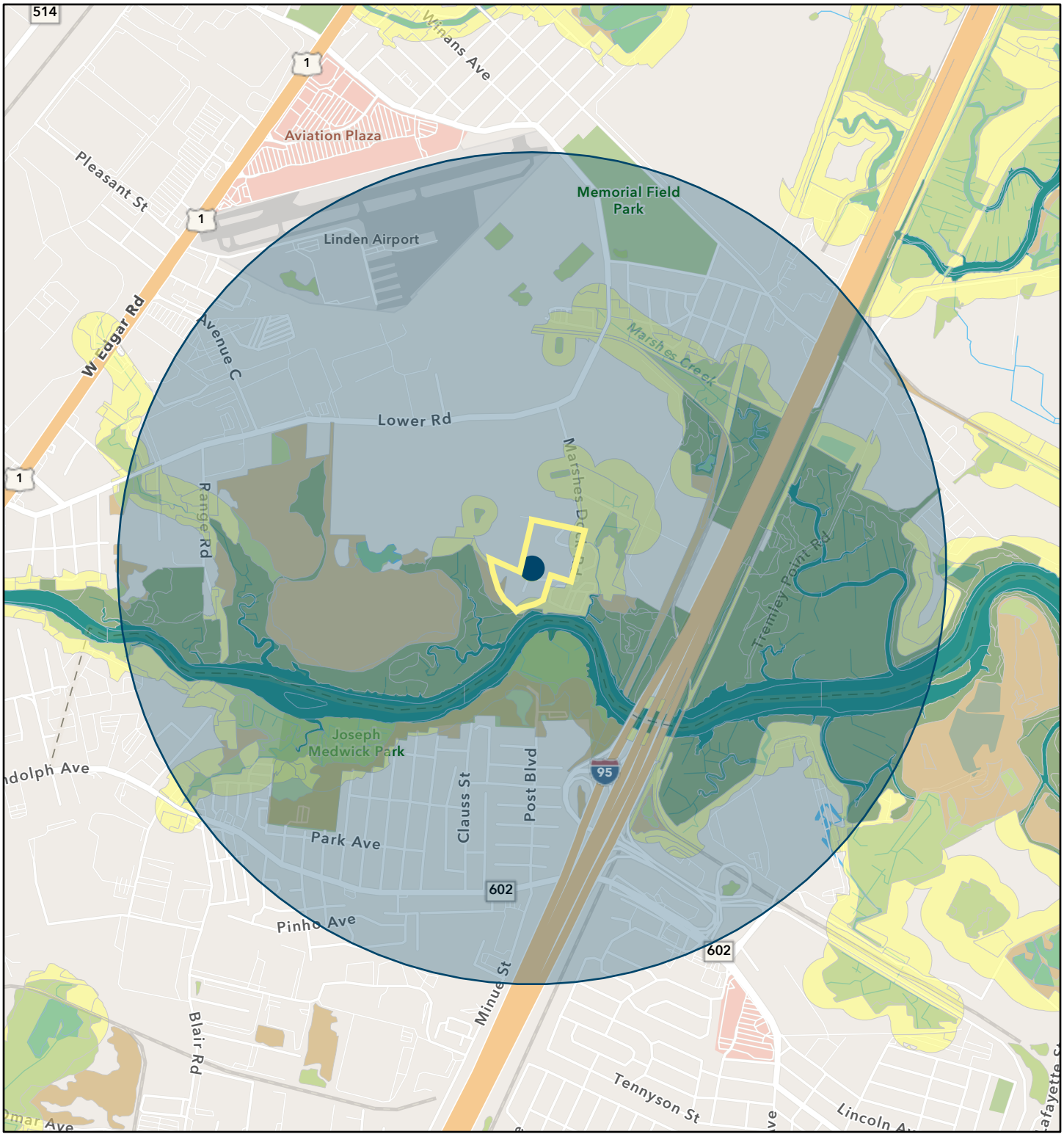
• Identification of Program Interest Number: 41801 or facility name (Global Companies LLC – Linden Terminal).


Global Companies LLC - Linden Terminal
2600 Marshes Dock Rd, Linden NJ Union County
Block/Parcels: 581 / 15.01 & 15.02
Total Acres: 16.2
Legend
Global Linden Facility Boundary
Global Companies LLC - Linden Terminal
Lower Rd
Gulf Oil
Welsco Concrete & Asphalt - Linden
Buckeye Pipe Line
Rahway River
Joseph Medwick Morial Park Wetland Area
Medwick Park Playground
Joseph Medwick Park
Virginia Ave
Delaware Ave
Riverview Ave
Dalessio Dr
George St
NJ Turnpike (Toll road)
Winsor Tractor Trailer Driving School
Smith & Solomon Commercial Driver
ALDI
Google Earth
N
2000 ft

Attachment 6 – Supplemental Information Site Maps

Habitats of Concern



6/16/2025, 1:17:21 PM

1:28,337

0 0.17 0.35 0.7 mi

0 0.28 0.55 1.1 km

2600 Marshes Dock Rd

SBH Piedmont Habitat - Landscape Project

Rank 1 - Habitat Specific Requirement

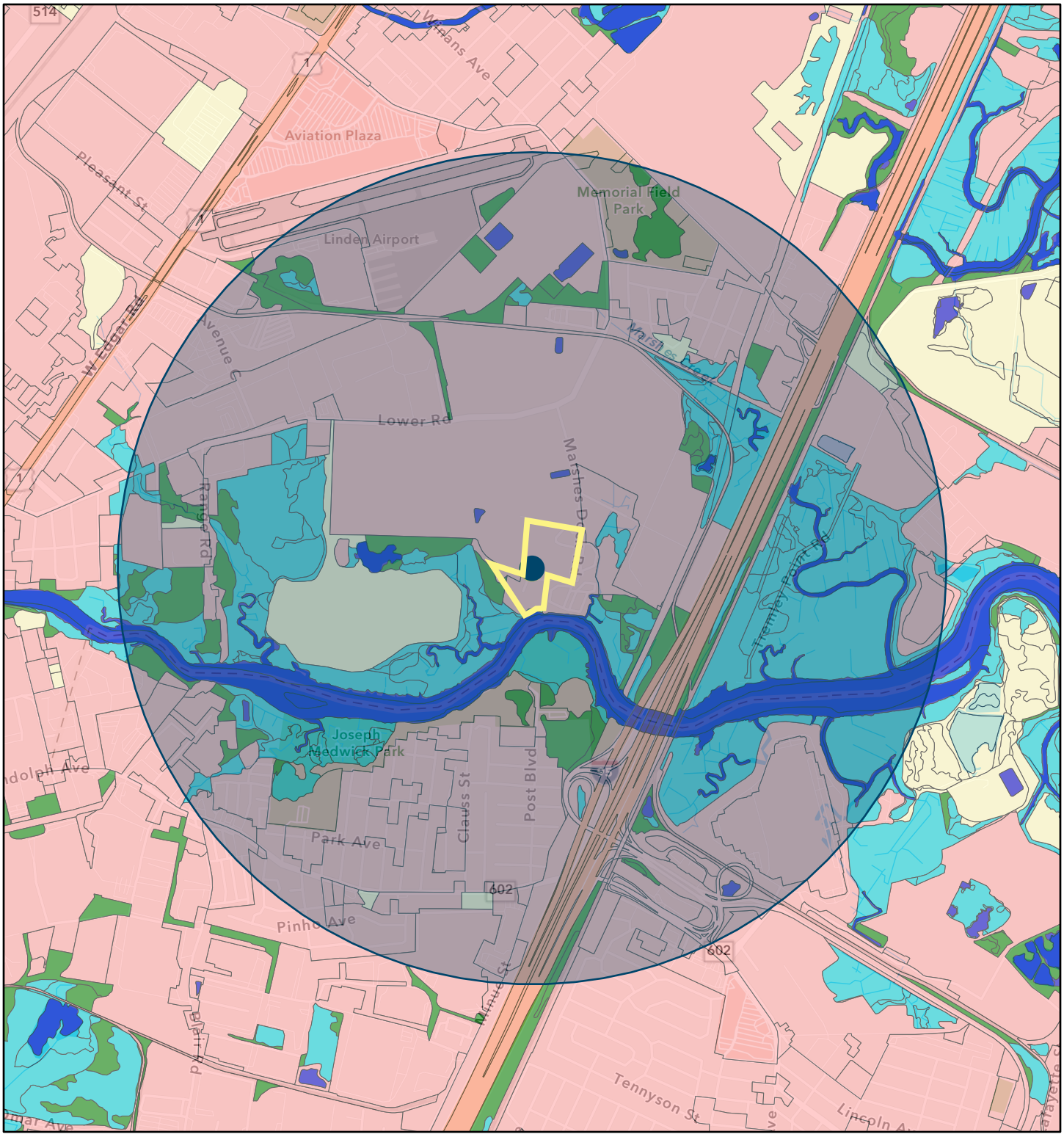
Rank 2 - Special Concern

Rank 3 - State Threatened

Rank 4 - State Endangered

Rank 5 - Federal Listed

Land Uses



6/16/2025, 1:20:47 PM

1:28,337

0 0.17 0.35 0.7 mi

0 0.28 0.55 1.1 km

2600 Marshes Dock Rd

URBAN

WATER

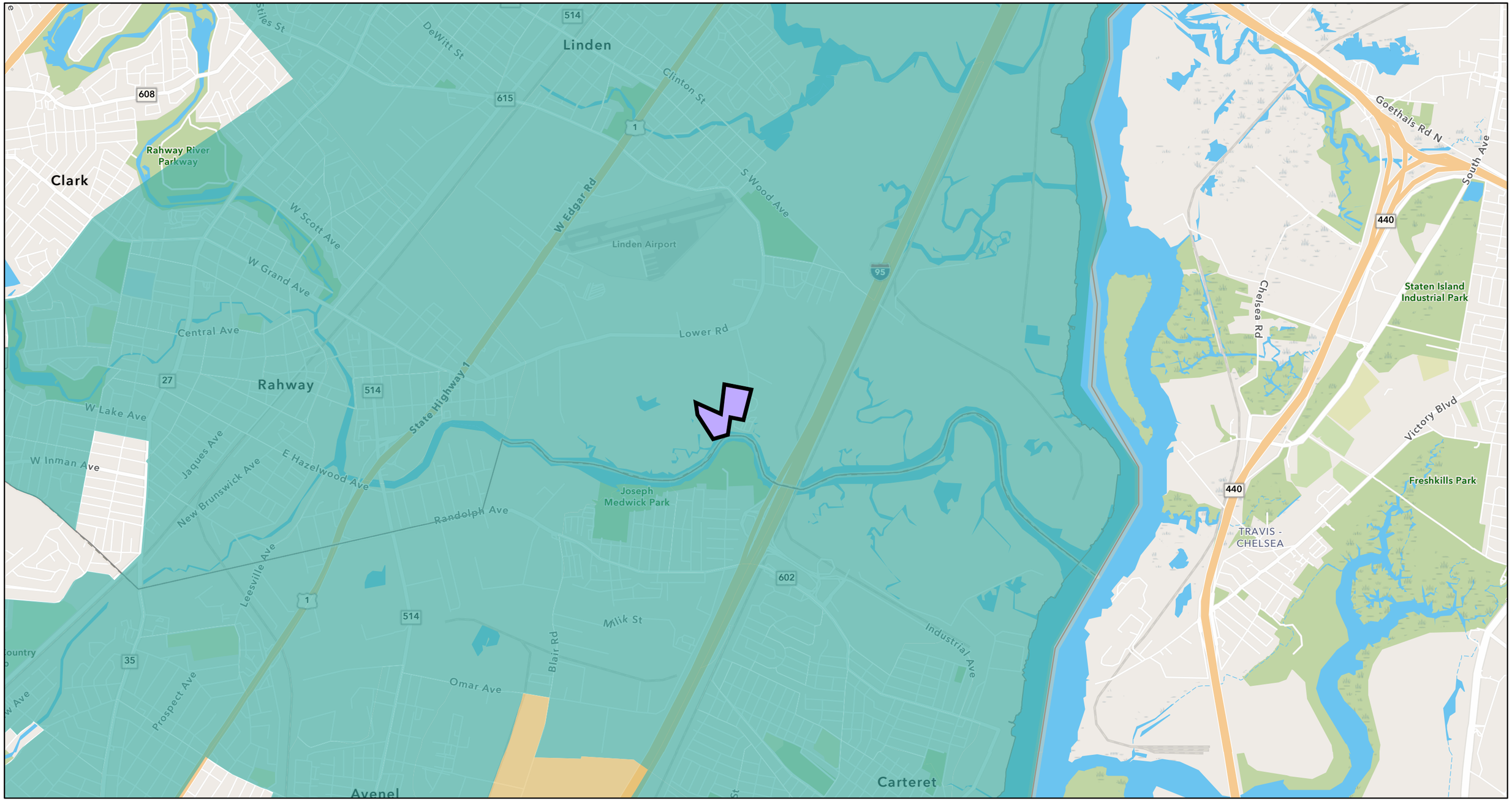
WETLANDS

BARREN LAND

FOREST

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

Overburdened Communities



6/16/2025, 1:43:02 PM

1:38,249

0 0.35 0.7 1.4 mi

0 0.5 1 2 km

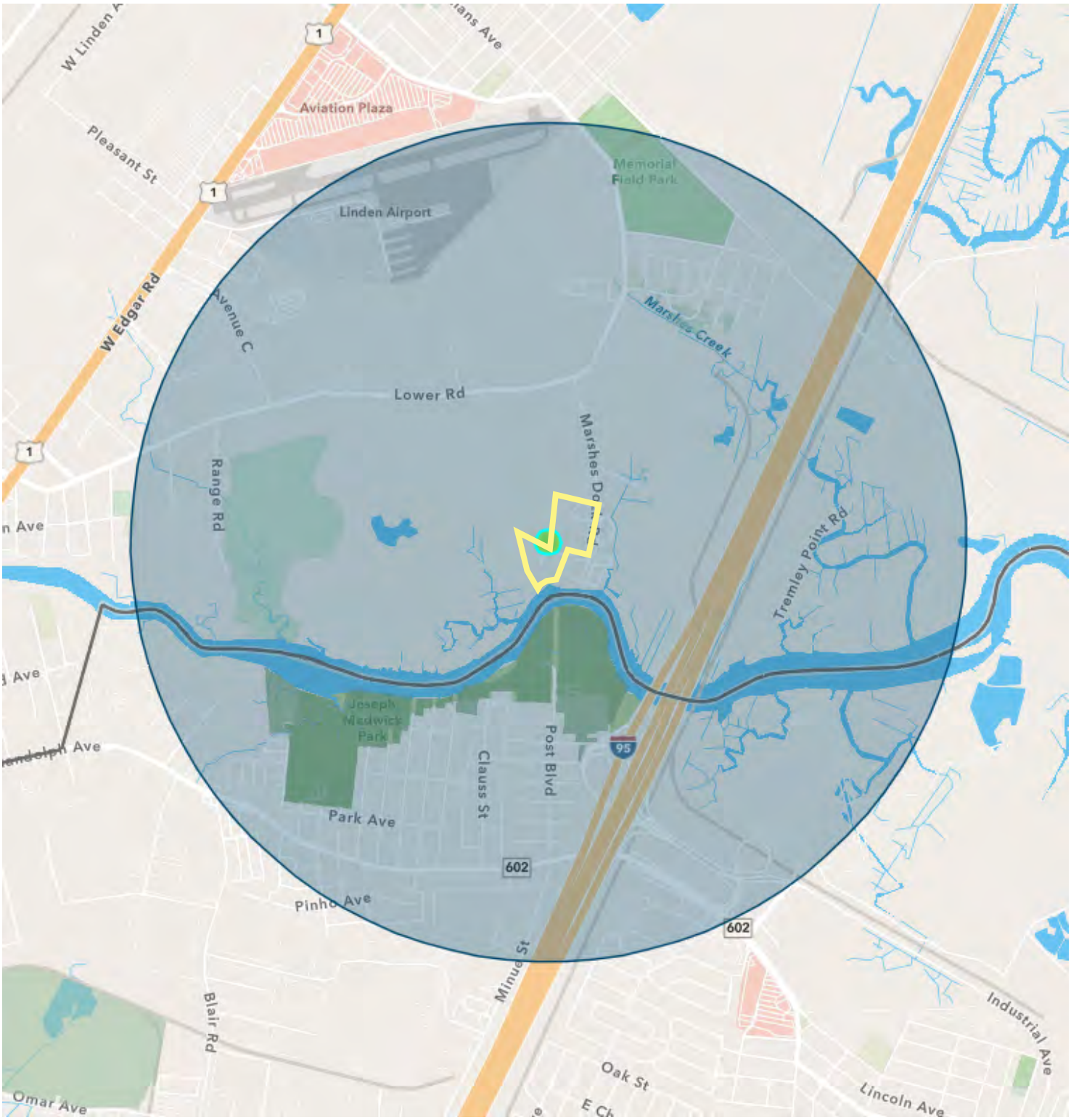
2600 Marshes Dock Rd, Linden NJ Union County Block/Parcel (581/15.01&15.02)

Overburdened Communities and Adjacent Block Groups (Effective as of 01-31-25)

- Adjacent
- OBC
- Counties

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

Public Spaces



6/16/2025, 1:14:19 PM

2600 Marshes Dock Rd

Open Space

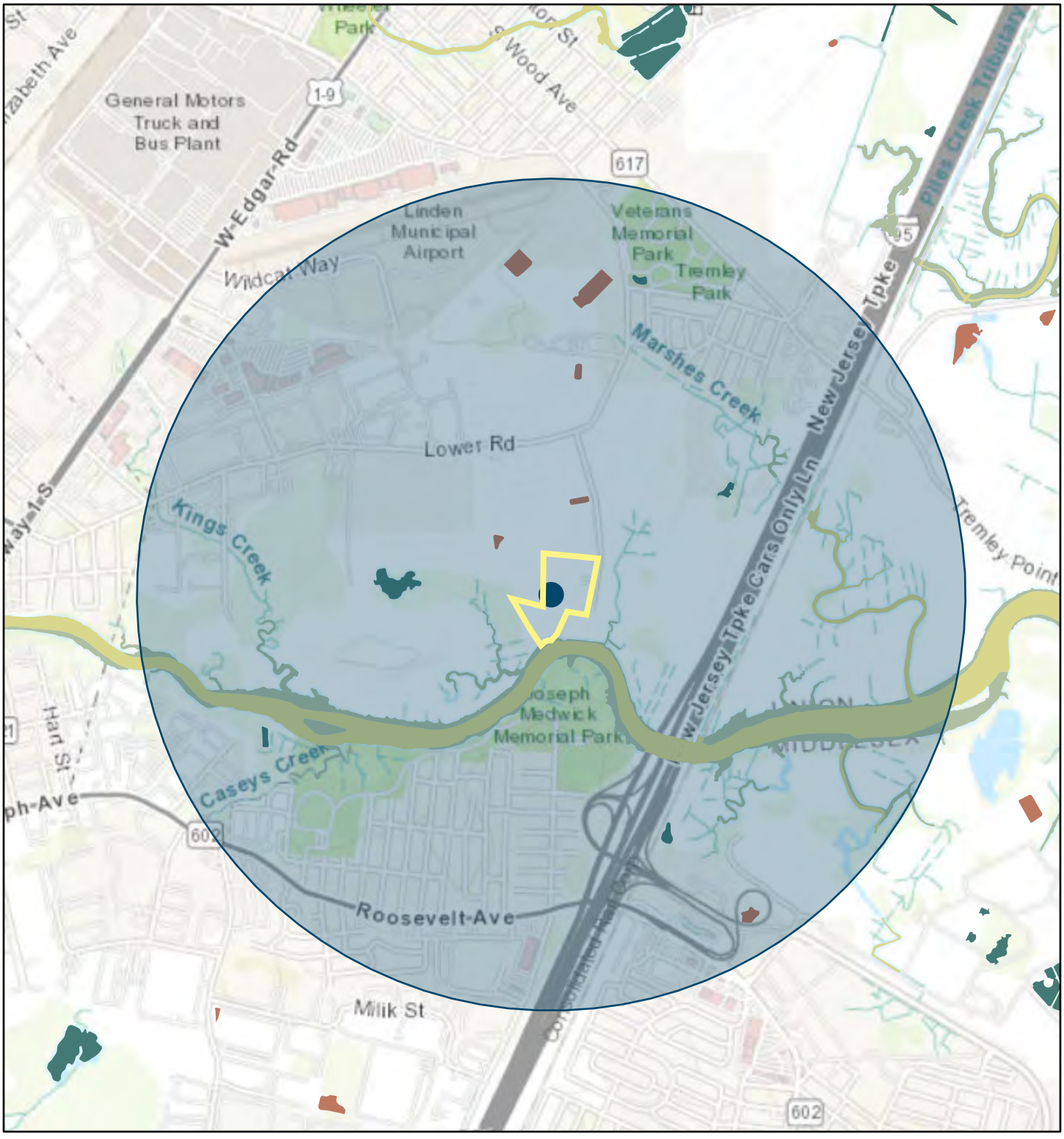
- Federal (State Owned)
- Fish and Wildlife
- Parks and Forestry
- Natural Lands Trust
- County
- County Unfunded
- Municipal
- Municipal Unfunded
- Nonprofit
- Nonprofit Unfunded
- Regional
- Regional Unfunded

1:28,337

0 0.17 0.35 0.7 mi

0 0.28 0.55 1.1 km

Surface Water Bodies



6/16/2025, 11:55:41 AM

1:28,337

0 0.17 0.35 0.7 mi

0 0.28 0.55 1.1 km

Waterbody 2020

- Lake/Pond
- Reservoir
- Stream/River
- Inundation Area
- Citations

NYC OpenData, State of New Jersey, Esri, HERE, Garmin, INCREMENT P, USGS, METI/NASA, EPA, USDA

U.S. DEPARTMENT OF THE INTERIOR
U.S. GEOLOGICAL SURVEY

The National Map OnDemand Topo

7.5-MINUTE TOPO QUADRANGLE
NEW YORK - NEW JERSEY CUSTOM EXTENT
7.5-MINUTE TOPO

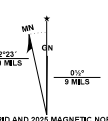
Global Companies, LLC Linden Terminal
2600 Marshes Dock Rd, Linden NJ Union County
Block/Parcels: 581/15.01 & 15.02

Produced by the United States Geological Survey
North American Datum of 1983 (NAD83)
World Geodetic System of 1984 (WGS84). Projection and
1 000-meter grid: UNIVERSAL TRANSVERSE MERCATOR, ZONE 18T

Data is provided by The National Map (TNM), is the best available at the time of map generation, and includes data content from supporting themes of Elevation, Hydrography, Geographic Names, Boundaries, Transportation, Structures, Land Cover, and Orthoimagery. Refer to associated Federal Geographic Data Committee (FGDC) Metadata for additional source data information.

This map is not a legal document. Boundaries may be generalized for this map scale. Private lands within government reservations may not be shown. Obtain permission before entering private lands. Temporal changes may have occurred since these data were collected and some data may no longer represent actual surface conditions.

Learn About The National Map: https://nationalmap.gov



UTM GRID AND 2025 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

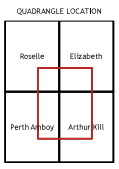
U.S. National Grid
100,000-m Square ID
WL
4100
WK
Grid Zone Designation
18T

SCALE 1:24 000

1 0.5 0 KILOMETERS 1 2
1000 500 0 METERS 1000 2000
1 0.5 0 1
MILES
1000 0 1000 2000 3000 4000 5000 6000 7000 8000 9000 10000
FEET

CONTOUR INTERVAL 5 FEET
NORTH AMERICAN VERTICAL DATUM OF 1988
CONTOUR SMOOTHNESS = Medium

QUADRANGLE LOCATION



ADJOINING QUADRANGLES

ROAD CLASSIFICATION

Expressway	Local Connector
Secondary Hwy	Local Road
Ramp	4WD

Interstate Route | US Route | State Route

7.5-MINUTE TOPO, NY
2025

Attachment 7 – Climate Data

NOAA STATION NAME	DATE	Total Monthly Precipitation	Total Monthly Snowfall
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2021-01	2.5	3.2
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2021-02	4.65	30.6
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2021-03	3.2	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2021-04	2.19	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2021-05	4.55	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2021-06	4.36	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2021-07	8.91	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2021-08	7.19	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2021-09	10.5	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2021-10	5.65	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2021-11	0.89	0.1
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2021-12	1.28	0.1
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2022-01	4.06	14.6
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2022-02	2.65	2.3
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2022-03	2.38	0.8
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2022-04	4.36	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2022-05	5.23	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2022-06	2.4	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2022-07	0.55	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2022-08	1.92	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2022-09	3.74	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2022-10	5.97	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2022-11	2.77	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2022-12	4.53	0.1
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2023-01	4.31	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2023-02	1.41	2
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2023-03	3.33	0.6
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2023-04	8.07	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2023-05	0.9	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2023-06	2.67	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2023-07	6.26	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2023-08	4.26	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2023-09	8.31	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2023-10	4.02	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2023-11	2.91	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2023-12	7.56	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2024-01	5.53	3.1
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2024-02	1.75	9.1
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2024-03	8	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2024-04	3.85	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2024-05	2.8	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2024-06	1.75	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2024-07	3.6	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2024-08	6.69	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2024-09	0.89	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2024-10	0	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2024-11	2.92	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2024-12	4.39	3.5
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2025-01	0.47	3.7
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2025-02	2.81	6.4
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2025-03	4.58	0
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2025-04	2.39	0

NOAA STATION NAME	DATE	Total Monthly Precipitation	Total Monthly Snowfall
LINDEN 2.2 NW, NJ US	2021-01	2.94	
LINDEN 2.2 NW, NJ US	2021-02	5.13	
LINDEN 2.2 NW, NJ US	2021-03	3.24	
LINDEN 2.2 NW, NJ US	2021-04	2.79	
LINDEN 2.2 NW, NJ US	2021-05	4.93	
LINDEN 2.2 NW, NJ US	2021-06	2.57	
LINDEN 2.2 NW, NJ US	2021-07	10.31	
LINDEN 2.2 NW, NJ US	2021-09	10.28	
LINDEN 2.2 NW, NJ US	2022-01	1.97	
LINDEN 2.2 NW, NJ US	2022-02	3.04	
LINDEN 2.2 NW, NJ US	2022-03	2.36	
LINDEN 2.2 NW, NJ US	2022-04	4.73	
LINDEN 2.2 NW, NJ US	2022-05	5.78	
LINDEN 2.2 NW, NJ US	2022-06	2.89	
LINDEN 2.2 NW, NJ US	2022-09	4.84	
LINDEN 2.2 NW, NJ US	2022-10	5.81	
LINDEN 2.2 NW, NJ US	2022-11	2.7	
LINDEN 2.2 NW, NJ US	2022-12	5.27	
LINDEN 2.2 NW, NJ US	2023-01	4.96	
LINDEN 2.2 NW, NJ US	2023-02	1.61	
LINDEN 2.2 NW, NJ US	2023-03	3.78	
LINDEN 2.2 NW, NJ US	2023-04	5.43	
LINDEN 2.2 NW, NJ US	2023-05	3.1	
LINDEN 2.2 NW, NJ US	2023-06	2.28	
LINDEN 2.2 NW, NJ US	2023-07	5.8	
LINDEN 2.2 NW, NJ US	2023-10	3.19	
LINDEN 2.2 NW, NJ US	2023-11	3.6	
LINDEN 2.2 NW, NJ US	2023-12	8.52	
LINDEN 2.2 NW, NJ US	2024-01	6.24	
LINDEN 2.2 NW, NJ US	2025-01	0.98	
LINDEN 2.2 NW, NJ US	2025-02	3.15	
LINDEN 2.2 NW, NJ US	2025-03	2.87	
LINDEN 2.2 NW, NJ US	2025-04	3.76	

NOAA STATION NAME	DATE	Extreme Max Temp	Average Monthly Temp	Monthly Max Temp	Monthly Minimum Temp
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2021-01	53	34.5	41.1	27.9
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2021-02	54	33.1	38.7	27.5
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2021-03	84	45.7	55.3	36.1
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2021-04	89	54.5	64.7	44.3
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2021-05	96	64.3	74.7	53.9
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2021-06	103	76.2	86.6	65.8
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2021-07	97	78.8	87.5	70.2
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2021-08	99	80	87.9	72
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2021-09	91	72.4	80.5	64.4
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2021-10	84	64.4	72.4	56.5
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2021-11	74	47.1	55.9	38.2
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2021-12	69	44.5	51.2	37.8
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2022-01	59	28.7	36.6	20.7
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2022-02	70	36.2	46.1	26.3
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2022-03	76	45.3	54.4	36.1
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2022-04	88	53.4	61.7	45.1
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2022-05	98	66.2	75.2	57.3
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2022-06	96	74.4	83.7	65
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2022-07	102	82.6	92.1	73.1
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2022-08	101	80.5	89.5	71.4
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2022-09	93	69.7	78.4	60.9
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2022-10	76	55.9	64.9	47
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2022-11	81	51	59.8	42.2
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2022-12	62	38.4	45.9	30.8
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2023-01	66	44	50.6	37.4
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2023-02	70	40.8	49.8	31.9
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2023-03	65	44.9	53.1	36.7
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2023-04	93	58	67.9	48
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2023-05	90	63.5	74	53.1
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2023-06	91	71.6	80.7	62.5
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2023-07	96	80.6	89.1	72.1
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2023-08	91	76.7	84.5	68.8
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2023-09	97	71.2	78.9	63.5
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2023-10	85	62	70.6	53.3
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2023-11	70	46.7	55.7	37.6
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2023-12	64	44.3	50.8	37.9
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2024-01	61	37.4	43.3	31.4
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2024-02	63	39.8	47.4	32.1
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2024-03	75	48.5	56.5	40.4
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2024-04	86	55.1	63.6	46.7
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2024-05	90	66.4	75.2	57.6
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2024-06	100	77.5	87.5	67.4
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2024-07	99	81.2	89.7	72.8
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2024-08	100	76.9	85.7	68.2
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2024-09	87	69.8	78.3	61.4
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2024-10	84	61.5	72	51
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2024-11	83	51.8	60.5	43.1
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2024-12	65	37.9	45	30.8
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2025-01	54	31.4	38.3	24.6
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2025-02	59	35.8	42.7	29
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2025-03	85	48.1	58.2	38.1
NEWARK LIBERTY INTERNATIONAL AIRPORT, NJ US	2025-04	87	56.1	65.6	46.6

Attachment 8 – Traffic Routes


Facility Access
Global Companies LLC -
Linden Terminal
Legend
Global Linden Facility Boundary
Access to Marshes Dock Rd
Facility Access/Marshes Dock Rd
Union County Fire Science Training
Astra Surfaces
ALDI
Grill & Buffet
Lower Rd
Smith & Solomon Commercial Driver
Linden Warehouse & Distribution Co., Inc.
Sunoco Tank Farm
Marshes Dock Road
Gulf Oil
Weldon Concrete & Asphalt - Linden
Buckeye Pipe Line
Rahway River
Marshes Creek
Parkway Ave
Williams Ga
NJ Tpke (Toll road)
95
Memorial Field Park
N
2000 ft
Google Earth

Attachment 9 – Facility Compliance History

Table 7. Facility Compliance History

Media Program	Program Interest #	Activity #	Effective Date	Type	Document Status	Penalty Assessed	Outstanding Balance
Air	41801	PEA 220004	6/19/2024	NOV	Closed		
Air	41801	PEA 220003	2/12/2024	AONO CAPA	Closed	$58,500.00	$0.00
DPCC	20090026 1000	NEA 220001	6/21/2022	Administrative Consent Order (ACO)	Closed	$1,583.00	$0.00
DPCC	20090026 1000	PEA 220001	5/10/2022	NOV	Closed		
Air	41801	PEA 220002	5/4/2022	AONO CAPA	Closed	$2,000.00	$0.00
Air	41801	PEA 220001	4/27/2022	NOV	Closed		

Attachment 10 – Localized Impact Control Technology (LICT) Analysis

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Albany, NY 12204
Phone: 518.453.2203
Fax: 518.453.2204
www.envirospeceng.com

Global Companies LLC - Linden Terminal
Localized Impact Control Technology (LICT)
October 2025
Revised November 2025

Global Companies LLC – Linden Terminal (Linden Terminal) is a bulk petroleum terminal located at 2600 Marshes Dock Road, Linden, Union County, New Jersey. The Linden Terminal is currently operated under Permit Number BOP240003, originally issued on July 26, 2001. The Linden Terminal was purchased from Gulf Oil Limited Partnership (Gulf) by Global Companies LLC (Global) in April 2024. During the due diligence process, inconsistencies in the permit were identified. To correct the inconsistencies, Global updated the Potential to Emit (PTE) calculations and submitted a Title V modification application to the New Jersey Department of Environmental Protection (NJDEP) on June 27, 2024, with a revision submitted on October 17, 2024. There are no physical changes proposed at the Linden Terminal as part of the modification. Although there is no anticipated increase in actual emissions, the modification application is considered an expansion since there is an increase in potential emissions. Therefore, Global is documenting the Localized Impact Control Technology (LICT).

Per N.J.A.C. 7:1C-7.1(b), documentation of LICT is required for the expansion of a major source if either of the following two conditions are met [N.J.A.C. 7:1C-7.1(a)]:

1. The facility has a potential to emit any HAP at a rate equal to or greater than the SOTA Threshold at N.J.A.C. 7:27-17.9.
2. The facility has a potential to emit carbon monoxide, nitrogen oxide, inhalable particles with diameters that are generally 10 micrometers and smaller, fine inhalable particles with diameters that are generally 2.5 micrometers and smaller, sulfur dioxide, total suspended particulate matter, total volatile organic compounds, or any other air contaminant or category of air contaminant not covered at (a)1 above at a rate individually equal to or greater than the five tons per year.

The Linden Terminal does not have the potential to emit any HAP at or exceeding the SOTA thresholds, but it does have the potential to emit VOCs at a rate greater than 5 tons per year. Therefore, LICT documentation for this project is required for VOCs.

Per N.J.A.C. 7:1C-7.1(c), compliance with the LICT standard is determined through a top-down approach as follows:

1. Identify and evaluate a list of air pollution control technologies or measures that may be applied to the source to reduce each contaminant identified at (a) above. This list shall not be limited to measures that have been applied to other existing sources in this same source category and shall include measures applied to sources in similar source categories, as well as innovative control technologies, modification of the process or process equipment, other pollution prevention measures, and combinations of the above measures.
2. Arrange the measures on the list in descending order of air pollution control effectiveness. The first-listed or "top" measure shall constitute LICT for the source unless the applicant provides one of the following:

i. A demonstration that the top measure should be eliminated from consideration because it is technically infeasible, based on physical, chemical, or engineering principles, and/or technical difficulties that would prevent the successful application of the measure;
ii. A demonstration that the top measure should be eliminated from consideration based on its environmental impacts. The justification shall show that the adverse environmental effects of the top measure, such as effects on water or land, or HAP emissions, when compared with its air contaminant emission reduction benefits, would make use of the top measure unreasonable; or
iii. A demonstration that the top measure should be eliminated from consideration based on its energy impacts. The justification shall show that the top measure uses fuels that are not reliably available; or that the energy consumed by the top measure is greater than the proposed measure(s), and that the extra energy used, when compared with the air contaminant emission reduction benefits resulting from the top measure, would make use of the top measure unreasonable.

3. If the top measure is eliminated from consideration under any of the provisions at (c)2i, ii, or iii above, the applicant shall evaluate each successive measure on the list, using the procedures described at (c)2 above, until a measure is reached that is not eliminated. Upon the Department's approval of the LICT demonstration, this measure shall constitute the LICT for the source.

A LICT demonstration has been completed for emissions units at the Linden Terminal for which changes to the PTE are proposed:

Emission Unit	Source Category
U1 – VFR Tank 101	Fixed Roof Tank
U2 – IFR Tank 102	Internal Floating Roof (IFR) Tank
U3 – EFR Tank 103	Internal Floating Roof (IFR) Tank
U4 – VFR Tank 104	Fixed Roof Tank
U6 – VFR Tank 106	Fixed Roof Tank
U7 – VFR Tank 110	Fixed Roof Tank
U8 – IFR Tank 111	Internal Floating Roof (IFR) Tank
U9 – EFR Tank 112	Internal Floating Roof (IFR) Tank
U10 – IFR Tank 113	Internal Floating Roof (IFR) Tank
U11 – Loading Rack	Truck Loading Rack
U14 – HFR Tank 105	Fixed Roof Tank
U15 – VFR 117 and 118	Fixed Roof Tank

The emissions units fall into three source types: fixed roof tanks, internal floating roof tanks, and the truck loading rack. A top-down LICT demonstration has been completed for each of these source types as detailed below.

LICT Demonstration

Vertical Fixed Roof Tanks

Fixed roof tanks are used to store low vapor pressure products and do not contribute significantly to overall emissions. Control for both routine emissions and cleaning emissions were evaluated to reduce overall

emissions from fixed roof tanks. Three methods of control were considered and are ranked below in descending order of air pollution control effectiveness:

1. Closed vent system
2. Internal Floating Roof
3. Controlled cleanings

The top-down analysis of the identified control measures for fixed roof tanks is provided in the following sections.

Closed Vent System

A closed vent system consists of routing tank vents to a control device. A slight negative pressure is applied to capture tank emissions. The control device is typically a vapor combustion unit (VCU) due to the flow rate and anticipated pollutant concentrations. A closed vent system requires extensive piping, and it is not always technically feasible to convert existing storage tanks to this system. Operation of a VCU for destruction of tank vapors requires substantial assist gas as either natural gas or propane. The gas required would be substantial to achieve an acceptable destruction efficiency due to the low BTU content of products stored in fixed roof tanks. In addition, destruction of vapors in the VCU results in combustion emissions, including NOx and CO, which can be higher than the reduction in VOCs from the closed vent system. Since fixed roof tanks are used to store low vapor pressure products, the contribution to overall facility emissions is minor. The slight decrease in emissions achieved would not justify the environmental impacts or energy usage from operation of a closed vent system. This technology is eliminated based on both the environmental impacts and energy usage.

Internal Floating Roof

Internal floating roofs could be installed in fixed roof tanks to reduce VOC emissions. An internal floating roof reduces VOC emissions by resting on the liquid surface therefore reducing the ability of the product to volatilize into the vapor space of the tank. However, fixed roof tanks are used to store low vapor pressure products which do not contribute significantly to overall facility emissions. There is a negative environmental impact associated with cleaning all of the fixed roof tanks and installing the floating roofs. The slight decrease in emissions achieved would not justify the resources required to manufacture and install floating roofs. This technology is eliminated based on environmental impacts.

Controlling Cleanings

Tank cleanings involve removal of product and vapors from tanks for the purposes of inspection, maintenance or certain product changes. Cleaning tanks is a periodic event that generates a higher level of emissions in a short period of time compared with routine operations. Tank cleanings typically last for 1 to 3 days. They are infrequent and not on a planned schedule outside of API inspections, which are typically every 20 years. Emissions from cleaning events can be controlled using a Portable VCU (PVCU). Fans are used to capture vapors which are then routed to a PVCU and combusted. Like a closed vent system, to achieve a desirable destruction efficiency, a substantial amount of assist gas as either natural gas or propane is required. In addition, destruction of vapors results in combustion emissions, including NOx and CO, which can be higher than the reduction in VOCs. Emissions from cleaning fixed roof tanks are not substantial due to the low vapor pressure of the products stored as well as the infrequency of cleaning events. The reduction of emissions from controlled cleanings would not justify the environmental impacts or energy usage required to control the cleanings. This technology is eliminated based on both the environmental impacts and energy usage.

Conclusion
Given that there is no significant impact from fixed roof tanks due to the low level of emissions from low vapor pressure products, there is no demonstrated LICT for vertical fixed roof tanks.

Internal Floating Roof Tanks

Internal Floating Roof tanks are used to store higher vapor pressure products such as gasoline. Emissions from IFR tanks are the majority of tank emissions at the Linden Terminal. Control for both routine and non-routine (landings and cleanings) emissions were evaluated to reduce overall emissions from IFR Tanks. Four methods of control were considered and are ranked below in descending order of air pollution control effectiveness:

1) Closed vent system
2) Internal Floating Roof
3) Controlled Cleanings
4) Controlled Landings

The top-down analysis of the identified control measures for IFR tanks is provided in the following sections.

Closed Vent System
As discussed previously, a closed vent system consists of routing tank vents to a control device. A slight negative pressure is applied to capture tank emissions. The control device is typically a VCU due to the flow rate and anticipated pollutant concentrations. A closed vent system requires extensive piping, and it is not always technically feasible to convert existing storage tanks to this system. Operation of a VCU for destruction of tank vapors requires substantial assist gas as either natural gas or propane. Although vapors from gasoline tanks would burn more efficiently in a VCU than low vapor pressure products, assist gas is still required to achieve acceptable destruction efficiency. In addition, destruction of vapors in the VCU results in combustion emissions, including NOx and CO, which can be higher than the reduction in VOCs achieved from a closed vent system compared to an IFR. The decrease in emissions achieved from use of a closed vent system when compared to an IFR would not justify the environmental impacts or energy usage from operation of a closed vent system. This technology is eliminated based on both the environmental impacts and energy usage.

Internal Floating Roof
IFRs reduce tank emissions by resting on the surface of the liquid and therefore reducing volatilization of the liquid into the vapor space of the tank. IFRs are required by state and federal regulations and are currently installed in tanks at the Linden Terminal storing products with vapor pressures greater than 1.5 psia. IFRs, once installed, do not require energy to operate and do not have a negative environmental impact. IFRs are the demonstrated LICT for higher vapor pressure product storage tanks and are currently in use at the Linden Terminal.

Conclusion
Tanks storing higher vapor pressure products are equipped with IFRs, which is the demonstrated LICT for the Linden Terminal. Although it is not required through the LICT demonstration, Global has proposed to control cleanings all year, not only during ozone season, for tanks storing gasoline. A PVCU will be used to control emissions during degassing and continuous forced ventilation.

Truck Loading Rack

Emissions from truck loading result from displacing vapors in the trucks with liquid loaded as well as fugitive emissions form connection losses to the truck. Control of vapors captured from the truck were evaluated separately from fugitive loading emissions. Methods of control were considered for each and are ranked below in descending order of air pollution control effectiveness.

Emissions from Displacement of Truck Vapors

1) VRU
2) Submerged Filling

Vapor Recovery Unit (VRU)
Emissions from displaced vapors from truck loading are currently controlled through a Vapor Recovery Unit (VRU). The VRU is permitted for 10 milligrams of VOCs per liter of gasoline loaded (10 mg/L). The performance test completed on February 13, 2025, demonstrated that the VRU emits VOCs at 0.39 mg/l, which is well below the permitted level. Use of a VRU is feasible and significantly reduces VOC emissions from truck loading. Operation of a VRU has a low environmental impact and energy usage when compared to the emissions that would result from uncontrolled truck loading. Use of a VRU is the demonstrated LICT for the truck loading rack and is currently in use at the Linden Terminal.

Submerged Filling
Submerged filling of gasoline minimizes turbulence and vapor/liquid contact, which reduces the potential for vapors escaping to the atmosphere. Submerged loading is significantly more effective than splash loading for VOC emissions. The current AP-42 emission factors for uncontrolled gasoline splash loading and submerged loading are 1,430 mg/L and 590 mg/L respectively (AP-42 Table 5.2-5). Gasoline is currently loaded at the facility via submerged filling.

Emissions from Loading Fugitives

1) Vacuum Assisted Loading
2) Vapor Tight Trucks
3) Leak Detection and Repair (LDAR) Program

Vacuum Assisted Loading
Implementation of vacuum assisted loading at the loading rack eliminates fugitive emissions that result from form the vapor system connection losses to the truck during truck loading. This technology consists of a blower and associated piping to create a slight vacuum on the vapor collection system at the loading rack. The blower requires electric power to operate. Although there is not a negative environmental impact from this technology, there is an energy impact, and this technology is not considered BACT. This technology is eliminated based on energy impacts.

Vapor Tight Trucks – Method 27
Vapor tightness documentation for gasoline cargo tanks includes an annual certification performed via the Method 27 pressure test. These standards minimize the potential for fugitive emissions during loading and require trucks be “vapor tight”. Trucks that load at the Linden Terminal are required to comply with leak testing

of tank trucks in accordance with 40 CFR Part 63, Subpart R. The current Method 27 pressure requirement for vapor tightness, as required by 40 CFR Subpart R, is 1.0 inches of water. Subpart R will require 0.5 inches of water following the May 8, 2027, applicability date for the rule updates. This vapor tightness testing requirement minimizes fugitive losses from trucks.

Leak Detection and Repair (LDAR) Program

Regular inspections for leaking equipment at a gasoline terminal minimize fugitive emissions to the atmosphere. The Linden Terminal currently monitors leaks via sight, sound and smell on a monthly basis per applicable requirements. Daily walk arounds are also completed, and leaks would be identified during those daily rounds. As of May 8, 2027, Subpart R will require semi-annual monitoring of equipment with optical gas imaging (OGI). This will assist with further identification and reduction of fugitive emissions.

Conclusion

A VRU is operated at the truck loading rack along with submerged loading, tank truck vapor tightness testing and an LDAR program, which is the demonstrated LICT for the Linden Terminal.