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June 17, 2013

Ms. Elizabeth Kudarauskas
US EPA Region I
5 Post Office Square, Suite 100
Mail Code: OES-04-2
Boston, MA 02109-3912

Mr. William Osbahr
US EPA Region I
Mail Code EIA
11 Technology Drive
North Chelmsford, MA 01863-2431

Re: Global Partners LP Asphalt Vapor Pressure Test Results as Required Under Section 114 Testing Order

Global Partners LP (Global) submits the attached laboratory analysis for vapor pressure of liquid asphalt from the South Portland Terminal. This submittal fulfills Testing Order 7.b of the Section 114 letter issued to Eric Slifka, President and CEO of Global Partners LP dated November 2, 2011.

The vapor pressure results for different temperatures are provided in the attached Test & Evaluation Report provided by PRI Asphalt Technologies, Inc. The asphalt liquid sample was collected on July 29, 2012 at 10:15 am from Global's South Portland Terminal Tank 9. The asphalt temperature on the day the sample was collected was 303 F. The asphalt contained in Tank 9 was delivered to the South Portland Terminal on July 28-29, 2012 by Sargeant Ltd and came from the ASESA Refinery in Tarragona, Spain.

The delay between the asphalt sample collection and the analysis was due to the trouble finding a laboratory capable of performing a vapor pressure analysis on asphalt (very rare request). The PRI Asphalt Technologies laboratory in Tampa, FL was the only lab Global could find who would do any vapor pressure testing on asphalt and they could only do ASTM D2879. As such, Global was unable to fulfill EPA's request for an additional vapor pressure analysis using ASTM D323-82 or 94. Global diligently made inquiries with several petroleum labs, local collages, environmental labs and with Bill Osbahr of EPA, and none had any guidance for doing ASTM D323-82 or 94 on an asphalt sample.

If you have any questions, please do not hesitate to call me, at (603) 647-5746 ext 102.

Sincerely,

Stephen Piper, P.E.
Senior Project Manager

Cc: Ron Kenny, Global Area Operations Manager
Bruce Yates, Global South Portland Terminal Manager
Tom Keefe, Global Director of EHS Operations

Attachment: Test & Evaluation Report

ASPHALT TECHNOLOGIES, INC.

TEST & EVALUATION REPORT

June 6, 2013

Report For: Global Companies, LLC
P.O. Box 2678
South Portland, ME 04116-2678

Attn: Bruce A. Yates, Jr. **Email:** byates@globalp.com

Sample Data/Information:

Sample ID: PG 64-22, Tank 9, Vessel: Asphalt Star	**Project #:** GLBL-01-02-01
Date Received: 5/6/13	**Supplier:** Global Companies

OBJECTIVE: Test and evaluate sample in accordance with ASTM D 2879/EPA for Vapor Pressure.

DATA/RESULTS:

Property		Test Method	Results
Vapor Pressure, mm of Hg (atm)	200°F	ASTM D 2879 / EPA	3.5 (0.005)
	250°F		23.8 (0.031)
	300°F		44.9 (0.059)
	350°F		77.2 (0.101)

DISCUSSION: Results are listed in the table above.

Tested by: Stanley R. Prince
Stanley Prince, Ph.D., Lead Scientist
Date: June 6, 2013

Reviewed by: Ken Grzybowski
Kenneth F. Grzybowski, President
Date: June 6, 2013

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