Commonwealth Of Pennsylvania
Department of Environmental Protection
Southcentral Regional Office
July 31, 2020

Subject: Sunoco Pipeline LP/Plainfield
Addendum Memo
Lower Frankford Township, Cumberland County
Permit No. 21-03108

To: William Weaver WRW 7/31/20
Regional Manager
Air Quality Program

Thru: Thomas Hanlon, Chief ***TJH 7/31/20***
East Permitting Section
Air Quality Program

From: Darrell Hartline *DH 7/31/20*
East Permitting Section
Air Quality Program

Comment Period

Copies of the proposed permit were submitted to Mr. Jed Werner, Manager Air Quality at Sunoco, and Ms. Courtney Gera of DEP. Ms. Gera did not have any comments/concerns with the proposed permit.

Notice of the Department's intent to issue the operating permit was published in the Pennsylvania Bulletin on February 15, 2020.

Comments

Mr. Werner provided the following comments in emails dated 3/11/20:

- *Our company has concern with the wording of Section B, condition 23. The wording seems to indicate that all malfunctions are to be reported to the state, even if they do not cause an excess emission.*

- *We are changing Responsible Officials to Director's of the company. [Richard Bishop]*

On 3/6/20, DEP received comments from the Clean Air Council regarding the draft State-Only Operating Permit. DEP's evaluation of these comments is found in the attached comment and response spreadsheet.

Additional Regulatory Analysis:

As part of the ongoing review of this permit, the Department has looked further into the issue of aggregation of the facility with other nearby sources owned by Sunoco Pipeline LP (SPLP). They provided supplemental information to their aggregation analysis on 2/16/16. The closest facility identified was the Conodonquinet Creek West EFRD Valve located approximately 5.1 miles away. There is no interdependence between operation of the Conodonquinet Creek West EFRD Valve and the Plainfield Station. As a result the Department has determined that no emissions need to be aggregated with those of the Plainfield Station.

Permit Condition Details:

This site is very similar to several other sites which have undergone parallel permitting in SCRO. Permit conditions for this site have been imposed consistent with those used or expected for the other similar sites, with the exception of E 01 007, below, which is more stringent, and may be imposed in the permits for the other associated sites at their renewal.

As part of this permit action, DEP is proposing to formalize its determination that the air emissions expected from the Plainfield Station, including both stack and fugitive emissions are of minor significance with regard to causing air pollution, and will not, on their own merits, prevent or interfere with the attainment or maintenance of an ambient air quality standard. A condition will be placed in the operating permit to this effect. DEP makes this determination because the post-control emissions from the site:

1.) do not meet the criteria for needing an air quality permit and
2.) are much smaller than the emissions from many other legally operating sources in the Commonwealth.
3.) have not been shown to cause any environmental problems during normal operation.

Cumberland County is currently designated as Attainment/Unclassifiable for the 2015 8-Hour Ozone NAAQS. However, since Cumberland County is located within the Ozone Transport Region, it is treated as moderate nonattainment for ozone for emission offset purposes. The current certified 2019 ozone design value for the Harrisburg-Carlisle MSA indicates compliance with the 2015 standard. With regard to particulate pollution, Cumberland County is currently designated as Unclassifiable/Attainment for the 2012 annual PM2.5 NAAQS and Attainment for the 2006 24-Hour PM2.5 NAAQS. As a minor source with post-control emissions below air permit thresholds, the Sunoco Plainfield facility is not expected to meaningfully affect local or regional compliance with ambient air quality standards.

The following condition was placed in Section C of the permit, *"The potential fugitive plus stack emissions from this facility, after appropriate control as prescribed in this permit, have been estimated as follows: 0.06 tpy of NOx, 0.24 tpy of CO, 0.76 tpy of VOCs, 0.01 tpy of Methane and 107.60 tpy of GHGs. The Department has determined these emissions remaining after appropriate control are of minor significance with regard to causing air pollution, and will not prevent or interfere with the attainment or maintenance of an ambient air quality standard."*

Operating Permit Revisions

After considering the above comments, and further reviewing the application, the following changes were made to the permit to provide clarification and additional details:

1. Updated the responsible official information on the cover sheet.
2. B 023 was removed and reverted back to the malfunction condition language now in C 015
3. Revised C 007 – DEP right to require testing.
4. C 008 and 009: deleted stack testing detail conditions as testing is not currently required or contemplated, and these conditions are not in other similar permits
5. C 011 (now C 009) – changed monitoring from monthly to weekly and added details for odors, visible emissions and fugitive emissions.
6. Added C 010 – calculate VOC emissions.
7. Revised Section C 012 (now C 011) to be consistent with other similar permits.
8. C 013 (reporting) and C 014 (annual records) and C 015 (135.5 records) were deleted and replaced with C 012 (VOC recording) and C 013 (emission increase records), for consistency with other similar permits
9. Added C014 – risk management plan
10. Revised C016 (now C015) – malfunction reporting
11. Added C016 – source report, C019 – work practice if excess emissions, C021 – compliance with local laws, regulations and ordinances and C022 – emissions are minor significance.
12. Section E, Group 01, added Condition 007 – flare operating guidelines.

Additional Comments

On July 20, 2020 DEP sent the draft permit to Mr. Jed Werner and Ms. Lauren Sion of Energy Transfer for an additional review. On July 23, 2020 in an email they provided several comments/questions, to which DEP responded in an email dated July 30, 2020 (attached).

Additional Operating Permit Revisions

After considering the above additional comments, the following changes were made to the permit to provide clarification and additional details:

1. Revised C 009 – the monitoring frequency was changed from weekly to monthly.
2. Revised E 007b – replaced “vented” to the flare with “routed” to the flare.

Conclusions and Recommendations

I recommend Permit No. 21-03108 be issued.

Attachments

cc: Altoona District/SC Region 21-03108, B3

Sunoco Plainfield Addendum Memo Attachments:

- 7/31/20 issued permit with transmittal email
- 7/31/20 DEP C&R re: CAC letter
- 7/30/20 ending email chain re: Sunoco's additional comments and DEP's responses
- 3/11/20 ending email chain re: Sunoco's initial comments and DEP's responses
- 3/6/20 CAC comment letter
- 1/29/20 DEP permit review memo
- 8/30/19 DEP administrative completeness letter
- 8/18/19 permit renewal application

Weaver, William (DEP)

From: Sion, Lauren N <LAUREN.SION@energytransfer.com>
Sent: Monday, August 3, 2020 11:01 AM
To: Weaver, William (DEP)
Cc: Werner, Jed A; Hanlon, Thomas; Hartline, Darrell; Matty, Kelley; Pipta, III, John; Wilkes, Dawne
Subject: [External] RE: Air Quality Permit Nos. 07-03062, 31-03035, 21-03108 (SOP renewals): Sunoco Hollidaysburg, Markelsburg, and Plainfield

ATTENTION: *This email message is from an external sender. Do not open links or attachments from unknown sources. To report suspicious email, forward the message as an attachment to CWOPA_SPAM@pa.gov.*

Mr. Weaver-

The permits were received.

Thank you,

Lauren Sion
Energy Transfer
Cell: (313) 706-9455

From: Weaver, William (DEP) <wiweaver@pa.gov>
Sent: Friday, July 31, 2020 4:14 PM
To: Sion, Lauren N <LAUREN.SION@energytransfer.com>
Cc: Werner, Jed A <JED.WERNER@energytransfer.com>; Hanlon, Thomas <thanlon@pa.gov>; Hartline, Darrell <dahartline@pa.gov>; Matty, Kelley <kmatty@pa.gov>; Pipta, III, John <jpiptaiii@pa.gov>; Wilkes, Dawne <dawilkes@pa.gov>
Subject: Air Quality Permit Nos. 07-03062, 31-03035, 21-03108 (SOP renewals): Sunoco Hollidaysburg, Markelsburg, and Plainfield

Upon receipt of this e-mail, please send a brief reply to acknowledge receipt

Re: Sunoco Pipeline, LP

Air Quality Operating Permit No. 07-03062
Hollidaysburg Facility
Allegheny Township, Blair County

and

Air Quality Operating Permit No. 31-03035
Markelsburg Facility
Penn Township, Huntingdon County

and

Air Quality Operating Permit No. 21-03108
Plainfield Facility

Lower Frankford Township, Cumberland County

Lauren Sion,

Attached please find the subject Air Quality State Only Operating Permits. I wish to call your attention to several of your responsibilities specified within the permit conditions.

The General Requirements in Section B of the subject Operating permits require you to submit information in demonstration of each facility's compliance with the terms and conditions of these Operating permits, if requested. This requirement is codified in 25 Pa. Code Section 127.442(a).

The Site Level Requirements in Section C of the subject operating permits require you periodically monitor each facility to detect visible emissions, fugitive emissions, and odorous air contaminants. Section C also requires you to maintain records of the periodic inspections.

If your facilities includes sources, which are subject to the reporting requirements of MACT, NSPS, NESHAP, or other federal standards, duplicate submissions must be made to the Department and to the EPA. The appropriate addresses are as follows:

Director
Air Protection Division
US EPA Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Regional Manager, Air Quality
DEP Southcentral Regional Office
909 Elmerton Avenue
Harrisburg, PA 17110-8200

In addition, the Plan Approval requirements of 25 Pa. Code Section 127.11 remain in effect for the installation and modification of sources and control devices at your facilities. For the reactivation of existing sources, please refer to 25 Pa. Code Section 127.215, which details the procedure to follow prior to reactivation. Please contact this office to determine if a Department Plan Approval is necessary for any proposed activities.

Any person aggrieved by these actions may appeal any or all of the actions to the Environmental Hearing Board (Board) pursuant to Section 4 of the Environmental Hearing Board Act, 35 P.S. § 7514, and the Administrative Agency Law, 2 Pa.C.S. Chapter 5A. The Board's address is:

Environmental Hearing Board
Rachel Carson State Office Building, Second Floor
400 Market Street
P.O. Box 8457
Harrisburg, PA 17105-8457

TDD users may contact the Environmental Hearing Board through the Pennsylvania Relay Service, 800.654.5984.

Appeals must be filed with the Board within 30 days of receipt of notice of these actions unless the appropriate statute provides a different time. This paragraph does not, in and of itself, create any right of appeal beyond that permitted by applicable statutes and decisional law.

A Notice of Appeal form and the Board's rules of practice and procedure may be obtained online at http://ehb.courtapps.com or by contacting the Secretary to the Board at 717.787.3483. The Notice of Appeal form and the Board's rules are also available in braille and on audiotape from the Secretary to the Board.

IMPORTANT LEGAL RIGHTS ARE AT STAKE. YOU SHOULD SHOW THIS DOCUMENT TO A LAWYER AT ONCE. IF YOU CANNOT AFFORD A LAWYER, YOU MAY QUALIFY FOR FREE PRO BONO REPRESENTATION. CALL THE SECRETARY TO THE BOARD AT 717.787.3483 FOR MORE INFORMATION. YOU DO NOT NEED A LAWYER TO FILE A NOTICE OF APPEAL WITH THE BOARD.

IF YOU WANT TO CHALLENGE THESE ACTIONS, YOUR APPEAL(S) MUST BE FILED WITH AND RECEIVED BY THE BOARD WITHIN 30 DAYS OF RECEIPT OF NOTICE OF THESE ACTIONS.

If you have any questions regarding this matter, please call me at 717.705.4868, leave a voicemail, and I will call you back.

William Weaver | Air Quality Program Manager
Department of Environmental Protection
Southcentral Regional Office
909 Elmerton Avenue | Harrisburg, PA 17110
Phone: 717.705.4868 | Fax: 717.705.4830
www.dep.pa.gov

From: Sion, Lauren N <LAUREN.SION@energytransfer.com>
Sent: Friday, July 31, 2020 4:01 PM
To: Weaver, William (DEP) <wiweaver@pa.gov>
Cc: Werner, Jed A <JED.WERNER@energytransfer.com>
Subject: [External] RE: Air Quality Permit Nos. 07-03062, 31-03035, 21-03108 (SOP renewals): Sunoco Hollidaysburg, Markelsburg, and Plainfield

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Yes, we can accept the permits as PDFs via email.

Thank you,

Lauren Sion
Energy Transfer
Cell: (313) 706-9455

From: Weaver, William (DEP) <wiweaver@pa.gov>
Sent: Friday, July 31, 2020 3:59 PM
To: Sion, Lauren N <LAUREN.SION@energytransfer.com>
Cc: Werner, Jed A <JED.WERNER@energytransfer.com>
Subject: Air Quality Permit Nos. 07-03062, 31-03035, 21-03108 (SOP renewals): Sunoco Hollidaysburg, Markelsburg, and Plainfield

Lauren Sion,

DEP has issued Air Quality Permit Nos. 07-03062, 31-03035, 21-03108, for the Sunoco Hollidaysburg, Markelsburg, and Plainfield pump stations, respectively. Due to our offices being closed due to the COVID-19 situation, we have no

effective way to mail you hard copies of the permits. Will you accept service of the signed, issued permits as pdf files by email? Please let me know ASAP.

William Weaver | Air Quality Program Manager
Department of Environmental Protection
Southcentral Regional Office
909 Elmerton Avenue | Harrisburg, PA 17110
Phone: 717.705.4868 | Fax: 717.705.4830
www.dep.pa.gov

In order to prevent the further spread of COVID-19, all Commonwealth offices will remain closed until restrictions are lifted. In the meantime, I will be working remotely to continue the mission of the Pennsylvania Department of Environmental Protection and frequently retrieving emails. Thank you for your patience.

For more information on COVID-19, please visit the PA Department of Health page.
Private and confidential as detailed here. If you cannot access hyperlink, please e-mail sender.
Private and confidential as detailed here. If you cannot access hyperlink, please e-mail sender.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

STATE ONLY OPERATING PERMIT

Issue Date: July 31, 2020 Effective Date: August 1, 2020
Expiration Date: July 31, 2025

In accordance with the provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and 25 Pa. Code Chapter 127, the Owner, [and Operator if noted] (hereinafter referred to as permittee) identified below is authorized by the Department of Environmental Protection (Department) to operate the air emission source(s) more fully described in this permit. This Facility is subject to all terms and conditions specified in this permit. Nothing in this permit relieves the permittee from its obligations to comply with all applicable Federal, State and Local laws and regulations.

The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable unless otherwise designated.

State Only Permit No: 21-03108

Federal Tax Id - Plant Code: 23-3102656-17

Owner Information

Name: SUNOCO PIPELINE LP
Mailing Address: 525 FRITZTOWN RD
SINKING SPRING, PA 19608-1509

Plant Information

Plant: SUNOCO PIPELINE LP/PLAINFIELD
Location: 21 Cumberland County 21913 Lower Frankford Township
SIC Code: 4619 Trans. & Utilities - Pipelines, Nec

Responsible Official

Name: RICHARD BISHOP
Title: OPERATIONS DIRECTOR
Phone: (724) 689 - 7500

Permit Contact Person

Name: LAUREN SION
Title: ENVIRO SPECIALIST
Phone: (412) 784 - 3474

[Signature] William R. Weaver
WILLIAM R. WEAVER, SOUTHCENTRAL REGION AIR PROGRAM MANAGER

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Note: These same sub-sections are repeated for each source!

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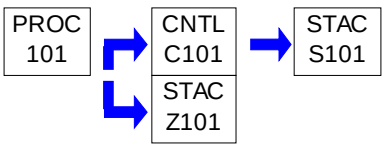
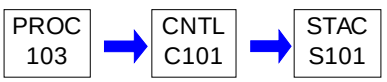
SECTION A. Site Inventory List

Source ID	Source Name	Capacity/Throughput	Fuel/Material
101	PUMP STATION SEAL LEAKS		
103	MAINTENANCE (PIGGING) OPERATION		
C101	ENCLOSED FLARE		
S101	ENCLOSED STACK FLARE		
Z101	FUGITIVE EMISSIONS		

PERMIT MAPS





SECTION B. General State Only Requirements

#001 [25 Pa. Code § 121.1]

Definitions.

Words and terms that are not otherwise defined in this permit shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and in 25 Pa. Code § 121.1.

#002 [25 Pa. Code § 127.446]

Operating Permit Duration.

(a) This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit.

(b) The terms and conditions of the expired permit shall automatically continue pending issuance of a new operating permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit.

#003 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446 & 127.703(b)&(c)]

Permit Renewal.

(a) The permittee shall submit a timely and complete application for renewal of the operating permit to the appropriate Regional Air Program Manager. The application for renewal of the operating permit shall be submitted at least six (6) months and not more than 18 months before the expiration date of this permit.

(b) The application for permit renewal shall include the current permit number, a description of any permit revisions that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official.

(c) The permittee shall submit with the renewal application a fee for the processing of the application and an additional annual administrative fee as specified in 25 Pa. Code § 127.703(b) and (c). The fees shall be made payable to "The Commonwealth of Pennsylvania - Clean Air Fund" and shall be for the amount specified in the following schedule specified in 25 Pa. Code § 127.703(b) and (c).

(1) Three hundred dollars for applications filed during the 2000-2004 calendar years.

(2) Three hundred seventy-five dollars for applications filed for the calendar years beginning in 2005.

(d) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413.

(e) The application for renewal of the operating permit shall also include submission of supplemental compliance review forms in accordance with the requirements of 25 Pa. Code § 127.412(b) and § 127.412(j).

(f) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information as necessary to address any requirements that become applicable to the source after the permittee submits a complete application, but prior to the date the Department takes action on the permit application.

#004 [25 Pa. Code § 127.703]

Operating Permit Fees under Subchapter I.

(a) The permittee shall pay fees according to the following schedule specified in 25 Pa. Code § 127.703(b):

(1) Three hundred dollars for applications filed during the 2000-2004 calendar years.

(2) Three hundred seventy-five dollars for applications filed for the calendar years beginning in 2005.

This fee schedule shall apply to the processing of an application for an operating permit as well as the extension,

SECTION B. General State Only Requirements

modification, revision, renewal, and re-issuance of each operating permit or part thereof.

(b) The permittee shall pay an annual operating permit administrative fee according to the fee schedule established in 25 Pa. Code § 127.703(c).

(1) Two hundred fifty dollars for applications filed during the 1995-1999 calendar years.

(2) Three hundred dollars for applications filed during the 2000-2004 calendar years.

(3) Three hundred seventy-five dollars for applications filed during the years beginning in 2005.

(c) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania - Clean Air Fund".

#005 [25 Pa. Code §§ 127.450 (a)(4) and 127.464]

Transfer of Operating Permits.

(a) This operating permit may not be transferred to another person, except in cases of transfer-of-ownership that are documented and approved by the Department.

(b) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership of the source shall be treated as an administrative amendment if the Department determines that no other change in the permit is required and a written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee and a compliance review form has been submitted to, and the permit transfer has been approved by, the Department.

(c) This operating permit is valid only for those specific sources and the specific source locations described in this permit.

#006 [25 Pa. Code § 127.441 and 35 P.S. § 4008]

Inspection and Entry.

(a) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Department or authorized representatives of the Department to perform the following:

(1) Enter at reasonable times upon the permittee's premises where a source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;

(2) Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;

(3) Inspect at reasonable times, any facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;

(4) Sample or monitor, at reasonable times, any substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.

(b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act or regulations adopted thereunder including denying the Department access to a source at this facility. Refusal of entry or access may constitute grounds for permit revocation and assessment of criminal and/or civil penalties.

(c) Nothing in this permit condition shall limit the ability of the EPA to inspect or enter the premises of the permittee in accordance with Section 114 or other applicable provisions of the Clean Air Act.

#007 [25 Pa. Code §§ 127.441 & 127.444]

Compliance Requirements.

(a) The permittee shall comply with the conditions of this operating permit. Noncompliance with this permit constitutes

SECTION B. General State Only Requirements

a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one or more of the following:

(1) Enforcement action

(2) Permit termination, revocation and reissuance or modification

(3) Denial of a permit renewal application

(b) A person may not cause or permit the operation of a source which is subject to 25 Pa. Code Article III unless the source(s) and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued for the source is operated and maintained in accordance with specifications in the applications and the conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to 25 Pa. Code Chapter 127 in a manner inconsistent with good operating practices.

(c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this State-Only permit. Nothing in this sub-condition shall be construed to create an independent affirmative duty upon the permittee to obtain a predetermination from the Department for physical configuration or engineering design detail changes made by the permittee.

#008 [25 Pa. Code § 127.441]

Need to Halt or Reduce Activity Not a Defense.

It shall not be a defense for the permittee in an enforcement action that it was necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

#009 [25 Pa. Code §§ 127.442(a) & 127.461]

Duty to Provide Information.

(a) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of each source at the facility.

(b) The permittee shall furnish to the Department, in writing, information that the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to maintain in accordance with this permit.

#010 [25 Pa. Code § 127.461]

Revising an Operating Permit for Cause.

This operating permit may be terminated, modified, suspended or revoked and reissued if one or more of the following applies:

(1) The permittee constructs or operates the source subject to the operating permit so that it is in violation of the Air Pollution Control Act, the Clean Air Act, the regulations thereunder, a plan approval, a permit or in a manner that causes air pollution.

(2) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.

(3) The permittee has failed to submit a report required by the operating permit or an applicable regulation.

(4) The EPA determines that the permit is not in compliance with the Clean Air Act or the regulations thereunder.

#011 [25 Pa. Code §§ 127.450 & 127.462]

Operating Permit Modifications

(a) The permittee is authorized to make administrative amendments, minor operating permit modifications and

SECTION B. General State Only Requirements

significant operating permit modifications, under this permit, as outlined below:

(b) Administrative Amendments. The permittee shall make administrative operating permit amendments (as defined in 25 Pa. Code § 127.450(a)), according to procedures specified in § 127.450 unless precluded by the Clean Air Act or its regulations.

(c) Minor Operating Permit Modifications. The permittee shall make minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.

(d) Permit modifications which do not qualify as minor permit modifications under 25 Pa. Code § 127.541 will be treated as a significant operating permit revision subject to the public notification procedures in §§ 127.424 and 127.425.

#012 [25 Pa. Code § 127.441]

Severability Clause.

The provisions of this permit are severable, and if any provision of this permit is determined by a court of competent jurisdiction to be invalid or unenforceable, such a determination will not affect the remaining provisions of this permit.

#013 [25 Pa. Code § 127.449]

De Minimis Emission Increases.

(a) This permit authorizes de minimis emission increases in accordance with 25 Pa. Code § 127.449 so long as the permittee provides the Department with seven (7) days prior written notice before commencing any de minimis emissions increase. The written notice shall:

(1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.

(2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.

(b) The Department may disapprove or condition de minimis emission increases at any time.

(c) Except as provided below in (d), the permittee is authorized to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:

(1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.

(2) One ton of NOx from a single source during the term of the permit and 5 tons of NOx at the facility during the term of the permit.

(3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.

(4) Six-tenths of a ton of PM10 from a single source during the term of the permit and 3.0 tons of PM10 at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.

(5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.

(6) Other sources and classes of sources determined to be of minor significance by the Department.

(d) In accordance with § 127.14, the permittee is authorized to install the following minor sources without the need for a plan approval or permit modification:

SECTION B. General State Only Requirements

(1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.

(2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.

(3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code §123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.

(4) Space heaters which heat by direct heat transfer.

(5) Laboratory equipment used exclusively for chemical or physical analysis.

(6) Other sources and classes of sources determined to be of minor significance by the Department.

(e) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:

(1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (c)(4) and (5) of this permit condition.

(2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.

(3) Violate any applicable requirement of this permit, the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.

(f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.

(g) Except for de minimis emission increases, installation of minor sources made pursuant to this permit condition and Plan Approval Exemptions under 25 Pa. Code § 127.14 (relating to exemptions), the permittee is prohibited from making changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.

(h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

#014 [25 Pa. Code § 127.3]

Operational Flexibility.

The permittee is authorized to make changes within the facility in accordance with the regulatory provisions outlined in 25 Pa. Code § 127.3 (relating to operational flexibility) to implement the operational flexibility requirements provisions authorized under Section 6.1(i) of the Air Pollution Control Act and the operational flexibility terms and conditions of this permit. The provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements include the following:

(1) Section 127.14 (relating to exemptions)

(2) Section 127.447 (relating to alternative operating scenarios)

(3) Section 127.448 (relating to emissions trading at facilities with Federally enforceable emissions caps)

(4) Section 127.449 (relating to de minimis emission increases)

(5) Section 127.450 (relating to administrative operating permit amendments)

SECTION B. General State Only Requirements

(6) Section 127.462 (relating to minor operating permit modifications)

(7) Subchapter H (relating to general plan approvals and general operating permits)

#015 [25 Pa. Code § 127.11]

Reactivation

(a) The permittee may not reactivate a source that has been out of operation or production for at least one year unless the reactivation is conducted in accordance with a plan approval granted by the Department or in accordance with reactivation and maintenance plans developed and approved by the Department in accordance with 25 Pa. Code § 127.11a(a).

(b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b).

#016 [25 Pa. Code § 127.36]

Health Risk-based Emission Standards and Operating Practice Requirements.

(a) When needed to protect public health, welfare and the environment from emissions of hazardous air pollutants from new and existing sources, the permittee shall comply with the health risk-based emission standards or operating practice requirements imposed by the Department, except as precluded by §§ 6.6(d)(2) and (3) of the Air Pollution Control Act [35 P.S. § 4006.6(d)(2) and (3)].

(b) A person challenging a performance or emission standard established by the Department has the burden to demonstrate that performance or emission standard does not meet the requirements of Section 112 of the Clean Air Act.

#017 [25 Pa. Code § 121.9]

Circumvention.

No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of 25 Pa. Code Article III, except that with prior approval of the Department, the device or technique may be used for control of malodors.

#018 [25 Pa. Code §§ 127.402(d) & 127.442]

Reporting Requirements.

(a) The permittee shall comply with the applicable reporting requirements of the Clean Air Act, the regulations thereunder, the Air Pollution Control Act and 25 Pa. Code Article III including Chapters 127, 135 and 139.

(b) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of any air contamination source.

(c) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:

Regional Air Program Manager
PA Department of Environmental Protection
(At the address given in the permit transmittal letter, or otherwise notified)

(d) Any records or information including applications, forms, or reports submitted pursuant to this permit condition shall contain a certification by a responsible official as to truth, accuracy and completeness. The certifications submitted under this permit shall require a responsible official of the facility to certify that based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate and complete.

(e) Any records, reports or information submitted to the Department shall be available to the public except for such

SECTION B. General State Only Requirements

records, reports or information which meet the confidentiality requirements of § 4013.2 of the Air Pollution Control Act and §§ 112(d) and 114(c) of the Clean Air Act. The permittee may not request a claim of confidentiality for any emissions data generated for the facility.

#019 [25 Pa. Code §§ 127.441(c) & 135.5]

Sampling, Testing and Monitoring Procedures.

(a) The permittee shall comply with the monitoring, recordkeeping or reporting requirements of 25 Pa. Code Chapter 139 and the other applicable requirements of 25 Pa. Code Article III and additional requirements related to monitoring, reporting and recordkeeping required by the Clean Air Act and the regulations thereunder including the Compliance Assurance Monitoring requirements of 40 CFR Part 64, where applicable.

(b) Unless alternative methodology is required by the Clean Air Act and regulations adopted thereunder, sampling, testing and monitoring required by or used by the permittee to demonstrate compliance with any applicable regulation or permit condition shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139.

#020 [25 Pa. Code §§ 127.441(c) and 135.5]

Recordkeeping.

(a) The permittee shall maintain and make available, upon request by the Department, the following records of monitored information:

(1) The date, place (as defined in the permit) and time of sampling or measurements.

(2) The dates the analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of the analyses.

(6) The operating conditions as existing at the time of sampling or measurement.

(b) The permittee shall retain records of any required monitoring data and supporting information for at least five (5) years from the date of the monitoring, sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.

(c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions.

#021 [25 Pa. Code § 127.441(a)]

Property Rights.

This permit does not convey any property rights of any sort, or any exclusive privileges.

#022 [25 Pa. Code § 127.447]

Alternative Operating Scenarios.

The permittee is authorized to make changes at the facility to implement alternative operating scenarios identified in this permit in accordance with 25 Pa. Code § 127.447.

SECTION B. General State Only Requirements

#023 [25 Pa. Code §135.3]

Reporting

(a) If the facility is a Synthetic Minor Facility, the permittee shall submit by March 1 of each year an annual emissions report for the preceding calendar year. The report shall include information for all active previously reported sources, new sources which were first operated during the preceding calendar year, and sources modified during the same period which were not previously reported. All air emissions from the facility should be estimated and reported.

(b) A source owner or operator of a Synthetic Minor Facility may request an extension of time from the Department for the filing of an annual emissions report, and the Department may grant the extension for reasonable cause.

#024 [25 Pa. Code §135.4]

Report Format

If applicable, the emissions reports shall contain sufficient information to enable the Department to complete its emission inventory. Emissions reports shall be made by the source owner or operator in a format specified by the Department.

SECTION C. Site Level Requirements

I. RESTRICTIONS.

Emission Restriction(s).

 # 001 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

The permittee shall not allow the emission into the outdoor atmosphere of a fugitive air contaminant from a source other than the following:

(a) Construction or demolition of buildings or structures.

(b) Grading, paving, and maintenance of roads and streets.

(c) Use of roads and streets. Emissions from material in or on trucks, railroad cars, and other vehicular equipment are not considered as emissions from the use of roads and streets.

(d) Clearing of land.

(e) Stockpiling of materials.

(f) Open burning operations

(g) Sources and classes of sources other than those identified in (a) - (f), above, for which the operator has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:

(1) The emissions are of minor significance with respect to causing air pollution; and

(2) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

 # 002 [25 Pa. Code §123.2]

Fugitive particulate matter

The permittee shall not allow the emission of fugitive particulate matter into the outdoor atmosphere from a source specified in Section C, Condition #001, if the emissions are visible at the point the emissions pass outside the person's property.

 # 003 [25 Pa. Code §123.31]

Limitations

The permittee shall not allow the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.

 # 004 [25 Pa. Code §123.41]

Limitations

The permittee shall not allow the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following:

(a) Equal to or greater than 20% for a period or periods aggregating more than three (3) minutes in any one hour.

(b) Equal to or greater than 60% at any time.

 # 005 [25 Pa. Code §123.42]

Exceptions

The emission limitation of 25 Pa. Code Section 123.41, shall not apply when:

(a) The presence of uncombined water is the only reason for failure of the emission to meet the limitations.

(b) The emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.

SECTION C. Site Level Requirements

(c) The emission results from sources specified in Section C, Condition #001, subsections (a) - (g).

 # 006 [25 Pa. Code §129.14]

Open burning operations

(a) The permittee shall not conduct open burning of materials in such a manner that:

(1) The emissions are visible, at any time, at the point such emissions pass outside the property of the person on whose land the open burning is being conducted.

(2) Malodorous air contaminants from the open burning are detectable outside the property of the person on whose land the open burning is being conducted.

(3) The emissions interfere with the reasonable enjoyment of life and property.

(4) A fire set in conjunction with the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.

(5) The emissions cause damage to vegetation or property.

(6) The emissions are or may be deleterious to human or animal health.

(b) Exceptions. The requirements of Subsection (a) do not apply where the open burning operations result from:

(1) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public official.

(2) Any fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.

(3) A fire set for the prevention and control of disease or pests, when approved by the Department.

(4) A fire set solely for recreational or ceremonial purposes.

(5) A fire set solely for cooking food.

(c) This permit does not constitute authorization to burn solid waste pursuant to section 610 (3) of the Solid Waste Management Act 35 P.S. Section 6018.610 (3), or any other provision of the Solid Waste Management Act.

II. TESTING REQUIREMENTS.

 # 007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a). If at any time the Department has cause to believe that air contaminant emissions from any source(s) listed in Section A, of this Permit, may be in excess of the limitations specified in this Permit, or established pursuant to, any applicable rule or regulation contained in 25 Pa. Code Article III, the permittee shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s).

(b). Such testing shall be conducted in accordance with the provisions of 25 Pa. Code Chapter 139, when applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the permittee that testing is required.

SECTION C. Site Level Requirements

III. MONITORING REQUIREMENTS.

 # 008 [25 Pa. Code §123.43]

Measuring techniques

Visible emissions may be measured using either of the following:

(a) A device approved by the Department and maintained to provide accurate opacity measurements.

(b) Observers, trained and certified in EPA method 9 to measure plume opacity with the naked eye or with the aid of any device(s) approved by the Department.

 # 009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall monitor the facility monthly for the following:

(1) odors which may be objectionable (as per 25 Pa. Code §123.31);
(2) visible emissions (as per 25 Pa. Code §§123.41 and 123.42); and
(3) fugitive emissions (as per 25 Pa. Code §§ 123.1 and 123.2).

(b) Objectionable odors, fugitive emissions, and visible emissions that are caused or may be caused by operations at the site shall:

(1) be investigated;
(2) be reported to the facility management, or individual(s) designated by the permittee;
(3) have appropriate corrective action taken (for emissions that originate on-site); and
(4) be recorded in a permanent written log.
(5) for any observed problems, a first attempt at equipment repair must be made within 15 days of discovery, and DEP must be notified if the final repair is not completed in 30 days.

(c) The Department reserves the right to change the above monitoring requirements at any time, based on but not limited to: the review of the compliance certification, complaints, monitoring results, and/or Department findings.

 # 010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall calculate the total emissions of VOCs for the entire facility on a 12-month rolling sum basis.

IV. RECORDKEEPING REQUIREMENTS.

 # 011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain a record of all monitoring of fugitive emissions, visible emissions and odors, including those that deviate from the conditions found in this permit. The record of deviations shall contain, at a minimum, the following items:

(a) date, time, and location of the incident(s);
(b) the cause of the event; and
(c) the corrective action taken, if necessary, to abate the situation and prevent future occurrences.

 # 012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall compile and record the total emissions of VOCs for the entire facility on a 12-month rolling sum basis.

 # 013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of all the facility's increases of emissions from the following categories:

(a). Deminimus increases without notification to the Department.
(b). Deminimus increases with notification to the Department, via letter.
(c). Increases resulting from a Request for Determination (RFD) to the Department.
(d). Increases resulting from the issuance of a plan approval and subsequent operating permit.

SECTION C. Site Level Requirements

V. REPORTING REQUIREMENTS.

 # 014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR Part 68.]

(a). If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 C.F.R. Part 68 (relating to chemical accident prevention provisions) and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act (P.L. 106-40).

(b). The permittee shall prepare and implement a Risk Management Plan (RMP) which meets the requirements of Section 112(r) of the Clean Air Act, 40 C.F.R. Part 68 and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act when a regulated substance listed in 40 C.F.R. § 68.130 is present in a process in more than the threshold quantity at a facility. The permittee shall submit the RMP to the federal Environmental Protection Agency according to the following schedule and requirements:

(1). The permittee shall submit the first RMP to a central point specified by EPA no later than the latest of the following:
(i). Three years after the date on which a regulated substance is first listed under 40 C.F.R. § 68.130; or,
(ii). The date on which a regulated substance is first present above a threshold quantity in a process.

(2). The permittee shall submit any additional relevant information requested by the Department or EPA concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 C.F.R. § 68.190.

(3). The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 C.F.R. Part 68, including a checklist addressing the required elements of a complete RMP.

(c). As used in this permit condition, the term "process" shall be as defined in 40 C.F.R. § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.

(d). If this facility is subject to 40 C.F.R. Part 68, as part of the certification required under this permit, the permittee shall:

(1). Submit a compliance schedule for satisfying the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. § 68.10(a); or,

(2). Certify that this facility is in compliance with all requirements of 40 C.F.R. Part 68 including the registration and submission of the RMP.

(e). If this facility is subject to 40 C.F.R. Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for five (5) years in accordance with 40 C.F.R. § 68.200.

(f). When this facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 C.F.R. Part 68, appropriate enforcement action will be taken by the Department if the permittee fails to register and submit the RMP or a revised plan pursuant to 40 C.F.R. Part 68.

 # 015 [25 Pa. Code §127.442]

Reporting requirements.

The permittee shall report malfunctions to the Department. A malfunction is defined as any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions. Malfunctions shall be reported as follows:

(a) Any malfunction which poses an imminent danger to the public health, safety, welfare, and environment, shall be immediately reported to the Department by telephone. The telephone report of such malfunctions shall occur no later than two (2) hours after the incident. The permittee shall submit a written report of instances of such malfunctions to the Department within three (3) days of the telephone report.

SECTION C. Site Level Requirements

(b) Unless otherwise required by this permit, any other malfunction that is not subject to the reporting requirement of subsection (a) above, shall be reported to the Department, in writing, within five (5) days of malfunction discovery.

(c)Telephone reports can be made to the Air Quality Program at (717) 705-4702 during normal business hours, or to the Department's Emergency Hotline at any time. The Emergency Hotline phone number is changed/updated periodically. The current Emergency Hotline phone number can be found at https://www.dep.pa.gov/About/Regional/SouthcentralRegion/Pages/default.aspx.

 # 016 [25 Pa. Code §135.3]

Reporting

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

If the permittee has been previously advised by the Department to submit a source report, the permittee shall submit by March 1, of each year, a source report for the preceding calendar year. The report shall include information from all previously reported sources, new sources which were first operated during the preceding calendar year, and sources modified during the same period which were not previously reported, including those sources listed in the Miscellaneous Section of this permit.

The permittee may request an extension of time from the Department for the filing of a source report, and the Department may grant the extension for reasonable cause.

VI. WORK PRACTICE REQUIREMENTS.

 # 017 [25 Pa. Code §121.7]

Prohibition of air pollution.

No person may permit air pollution as that term is defined in the Air Pollution Control Act (35 P.S. Section 4003).

 # 018 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

The permittee shall take all reasonable actions to prevent particulate matter from becoming airborne from any source specified in Section C, Condition #001(a) -(g). These actions shall include, but are not limited to, the following:

(a) Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land.

(b) Application of asphalt, oil, water, or suitable chemicals on dirt roads, material stockpiles, and other surfaces, which may give rise to airborne dusts.

(c) Paving and maintenance of roadways.

(d) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or other means.

 # 019 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall immediately, upon discovery, implement measures, which may include the application for the installation of an air cleaning device(s), if necessary, to reduce the air contaminant emissions to within applicable limitations, if at any time the operation of the source(s) identified in Section A, of this permit, is causing the emission of air contaminants in excess of the limitations specified in, or established pursuant to, 25 Pa. Code Article III or any other applicable rule promulgated under the Clean Air Act.

 # 020 [25 Pa. Code §127.444]

Compliance requirements.

The permittee shall operate and maintain all sources and any air cleaning devices identified in this operating permit in accordance with the manufacturers' recommendations/specifications, as well as in a manner consistent with good operating practices.

SECTION C. Site Level Requirements

VII. ADDITIONAL REQUIREMENTS.

 # 021 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Nothing herein shall be construed to supersede, amend, or authorize violation of the provisions of any valid and applicable local law, ordinance, or regulation, or any court order, provided that said local law, ordinance, or regulation, or court order is not preempted by the Air Pollution Control Act, Act of January 8, 1960, P.L. 2119 (1959), as amended, 35 P.S. §4001 et seq., and the rules and regulations promulgated thereunder. It is the applicant's responsibility, separate and apart from the application process, to obtain any authorizations, permits, approvals, or licenses that the applicant might need in order to perform the construction permitted by this plan approval, including access, ownership, or lease of the subject parcel or parcels of property. The Department incurs no enforcement obligations with respect to this condition.

 # 022 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The potential fugitive plus stack emissions from this facility, after appropriate control as prescribed in this permit, have been estimated as follows: 0.06 tpy of NOx, 0.24 tpy of CO, 0.76 tpy of VOCs, 0.01 tpy of Methane and 107.60 tpy of GHGs. The Department has determined these emissions remaining after appropriate control are of minor significance with regard to causing air pollution, and will not prevent or interfere with the attainment or maintenance of an ambient air quality standard.

VIII. COMPLIANCE CERTIFICATION.

No additional compliance certifications exist except as provided in other sections of this permit including Section B (relating to State Only General Requirements).

IX. COMPLIANCE SCHEDULE.

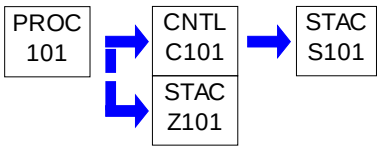
No compliance milestones exist.

SECTION D. Source Level Requirements

Source ID: 101 Source Name: PUMP STATION SEAL LEAKS

Source Capacity/Throughput:

Conditions for this source occur in the following groups: GRP 01



I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

SECTION D. Source Level Requirements

Source ID: 103 Source Name: MAINTENANCE (PIGGING) OPERATION

Source Capacity/Throughput:

Conditions for this source occur in the following groups: GRP 01

PROC 103 → CNTL C101 → STAC S101

I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

SECTION E. Source Group Restrictions.

Group Name: GRP 01

Group Description: Pump Station & Maintenance

Sources included in this group

ID	Name
101	PUMP STATION SEAL LEAKS
103	MAINTENANCE (PIGGING) OPERATION

I. RESTRICTIONS.

Emission Restriction(s).

 # 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The enclosed flare shall be operated with no visible emissions and no visible flame.

Fuel Restriction(s).

 # 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall burn only propane, butane, ethane or a mixture of these in the enclosed flare.

 # 003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The enclosed flare pilot light shall burn propane gas.

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

 # 004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

When the enclosed flare is not operational, the permittee shall record the downtime and the associated emissions.

 # 005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain detailed records of all maintenance performed on the enclosed flare. The permittee shall retain these records for a minimum of five (5) years and shall make them available to the department upon its request.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

 # 006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain a system to notify the operator immediately when the enclosed flare is not operational.

SECTION E. Source Group Restrictions.

VII. ADDITIONAL REQUIREMENTS.

 # 007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

a.) The flare shall be operated at all times that the Source 103 Maintenance (Pigging) Operation is operating.
b.) The flare shall be operated continuously when the motor operated valve (MOV) is open between the knock out tank and the flare. Emissions from the knockout tank shall not be released directly to atmosphere, but shall rather all be routed to the flare.
c.) The permittee shall keep records sufficient to document compliance with a.) and b.) above, and shall notify DEP within 30 days of the end of each calendar half period if the requirements of either a.) or b.) were not met during that period.

SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this permit.

SECTION G. Emission Restriction Summary.

No emission restrictions listed in this section of the permit.

SECTION H. Miscellaneous.

This permit supersedes Operating Permit 21-03108 issued February 6, 2015.

Ref. RFD #2083, Maintenance Operating Scenario includes one (1) Pig Launcher, one (1) Pig Receiver, two (2) Product Meters and one (1) Prover.

****** End of Report ******

DEP responses to 3/6/20 Clean Air Council comments re: 3 draft Air Permits for Sunoco Pipeline sites
07-03062: Hollidaysburg (Blair Co.)
21-03108: Plainfield (Cumberland Co.)
31-03035: Markelsburg (Huntingdon Co.)

#	Comment	DEP Response
1	The Council is aware Sunoco is operating approximately eighteen pumping stations along the Mariner East 2 pipeline route, with many of these pumping stations relying on the same infrastructure and emissions control technology. This comment is particularly important because the concerns raised herein are relevant not only to the renewal applications at hand, but also to the other permits of Sunoco's Mariner East 2 pumping stations across Pennsylvania.	DEP regulations require that each draft permit renewal for each site undego separate public notice. Public comments regarding each permit renewal must therefore be submitted during the respective public comment period for each draft permit.
2	The public is relying on the Department and the integrity of this permitting process to ensure that these pumping stations neither cause harm to the public nor diminish air quality, and specifically, to limit emissions of volatile organic compounds ("VOCs") and explosive natural gas liquids ("NGLs"), which are a particular threat to public health and safety. The Council appreciates this opportunity to bring these matters to the attention of the Department.	DEP is required by law to review air permit applications in accordance with established laws and regulations. DEP takes seriously its obligations to do this.
3	In the comments that follow, the Council discusses why the renewal permits all three pumping stations should be withheld for further assessment due to: 1.) explosion risks from higher operating pressures, 2.) unquantified higher emissions above permitted rates, 3.) and unquantified higher emissions levels from flare operation.	See responses below for DEP's specific responses to the details of each of these issues.
4	1. The Renewal Permits Should Be Withheld for Further Assessment Due to Explosion Risks from Higher Operating Pressures. The Council requests that all three renewal permits be withheld pending further analysis, evaluation, and testing of the Facilities' ability to operate safely under pressure loads higher than those they were designed for.	See the response to Comment 7 (no change in ME1 pressure).
5	All three Permits regulate pumping stations designed to increase the pressure of NGLs in the Mariner East 2 pipelines to transport them along the route. The Facilities include electric pumps that each have two seals. The Facilities' Permits were issued in 2015 on the basis of operating conditions as set forth in the original applications. See Hollidaysburg Permit File, Plainfield Permit File, and Markelsburg Permit File . The renewal applications discuss no modification of pump or seal design or any changes to the operating pressure at the pump station or in the pipeline. See Hollidaysburg Renewal Memo, Plainfield Renewal Memo, and Markelsburg Renewal Memo . In the original Permit applications, the pump seals were designed for a "Max Potential Box Pressure of 1480 PSIG." Hollidaysburg Permit File at 66 , Plainfield Permit File at 66, and Markelsburg Permit File at 65.	Per 6/2/20 Sunoco email, "*The renewal applications did not discuss changes in operating pressure because there is no change in the operating pressure for these pump stations. It is important to note that the Hollidaysburg, Plainfield and Markelsburg stations only have ME1 equipment and are unrelated to the ME2 pipeline and ME2X pipelines that the comment is mistakenly referencing*." DEP concurs that this addresses the comment.
6	Since the issuance of the original permits, the Council learned that Sunoco plans to operate at least some segments of the Mariner East 2 pipelines at a maximum operating pressure of 2,100 psig. Sunoco documented this planned pressure change as early as 2018 in its Horizontal Directional Drill ("HDD") Reevaluation Reports for its 16" pipeline. For example, in the HDD Reevaluation Report for the Norfolk Southern Railroad Crossing, the original HDD Plan drawing for the 16" pipeline notes an "internal design pressure [of] 1480 psig." However, Sunoco has used different terminology at different times for the various Mariner East pipes. Herein, the Council means to refer to any NGL pipes Sunoco may use in connection with the Facilities.	Per 6/2/20 Sunoco email, "*Maximum potential pressures at which a pipe can be safely operated stated in a HDD re-evaluation report for a completely different pipeline (Mariner East 2X) are not relevant to this analysis, since the maximum operating pressure is not changing for the Mariner East 1 and Mariner East 2 pipelines.*" DEP concurs that this addresses the comment.
7	However, the revised HDD Plan drawing for the 16" pipeline states an "internal design pressure [of] 2100 psig." This is no typographical error or accidental feature. Such design changes consistently exist throughout other HDD Reevaluation Reports. Because the maximum box pressure of the seals in the pumps at the Hollidaysburg, Plainfield, and Markelsburg stations is 1,480 psig, the Council expresses grave concerns about whether the Facilities can operate safely at 2,100 psig, which is 42% more than the maximum pressure for which the pump seals are designed.	The concern expressed in this comment does not appear to be valid because there is no change in operating pressure at the ME1 stations.

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#	Comment	DEP Response
8	Operating the Facilities at such an increase in pressure would potentially cause seals to break down, shorten their useful life, or, even worse, completely fail. Such failures or breakdowns may lead to significant leaks or an explosion.	See the response to Comment 7 (no change in ME1 pressure).
9	Sunoco's planned increase in pipeline pressure puts not just the Hollidaysburg, Plainfield, and Markelsburg pumping stations at failure risk, but also the other pumping stations along the Mariner East 2 route due to their homogeneous design.	Per 6/2/20 Sunoco email, "*There is no change in operating pressure across the Mariner East 1 or 2 lines* ." See also the response to Comment 7 (no change in ME1 pressure).
10	The most pressing step the Department should take is to withhold the permit renewals for further evaluation, analysis, and testing of the pipeline and 18 pumping stations due to Sunoco's planned pressure increase.	See the response to Comment 7 (no change in ME1 pressure).
11	The Council notes that any increase in pressure Sunoco plans to impart on Mariner East 2 above 1,480 psig would violate the existing permits for all the pumping stations using Flowserve pumps and seals with the maximum potential box pressure of 1,480 psig.	See the response to Comment 7 (no change in ME1 pressure).
12	The Council believes almost all of the 18 pumping stations use this equipment as permitted and any major operation changes in the pipeline would cause violations of such permits because certain operational changes may lead to changes in emissions.	See the response to Comment 7 (no change in ME1 pressure). Also, per 6/2/20 Sunoco email, "*There are no major operation changes.* "
13	The Council urges the Department to withhold issuing the Hollidaysburg, Plainfield, and Markelsburg stations permit renewals in light of this and requests that Sunoco submit new applications with updated operation conditions, emissions data, and testing results in furtherance of the pressure Sunoco intends to impart on the pipelines.	See the response to Comment 7 (no change in ME1 pressure). Also, per 6/2/20 Sunoco email, "*The applications are accurate, there are no changes to operating conditions.*"
14	2. The Renewal Permits Should Be Withheld for Further Evaluation Due to Expected Unquantified Higher Emissions Above Permitted Rates. The Council further requests that all three renewal permits be withheld due to an unknown higher level of emissions from the Facilities resulting from increasing the Mariner East 2 pressure.	See the response to Comment 7 (no change in ME1 pressure).
15	As noted above, if Sunoco plans to operate the pipeline at a pressure of 2,100 psig, the existing pump seals may not perform properly or may fail. Setting aside the catastrophic concerns of this, another consequence is that the seals will be strained at higher pressures, resulting in higher expected losses of pipeline product, including VOCs.	See the response to Comment 7 (no change in ME1 pressure).
16	The current renewal applications for the Hollidaysburg, Plainfield, and Markelsburg stations note the anticipated VOCs emitted to be 0.87, 0.76, and 0.74 tons per year (respectively) under the originally proposed operating conditions of 1,480 psig pipeline pressure. See Hollidaysburg Renewal Memo, Plainfield Renewal Memo, and Markelsburg Renewal Memo . If Sunoco increases the pressure of the pipelines by 42%, the emissions expected should be much higher, but how much higher is unknown and likely a factor of how well the seals function at 42% above their maximum potential box pressure.	See the response to Comment 7 (no change in ME1 pressure).
17	Because the quantity of emissions at a higher pipeline pressure is unknown, the Council asserts all of the current renewal applications' estimated potential emissions are erroneous.	See the response to Comment 7 (no change in ME1 pressure).
18	The Council urges the Department to remedy this by withholding the renewal permits until Sunoco updates the applications in light of the pressure increase.	See the response to Comment 7 (no change in ME1 pressure).
19	3. The Renewal Permits Should Be Withheld for Further Evaluation of Emissions Levels from Flare Operation.	See the response to Comments 20 (flare DRE) and 21 (enforceability).

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#	Comment	DEP Response
20	Sunoco has identified two ways in which its pumping stations generate emissions, and in particular, emissions of VOCs: pump station seal leaks and maintenance (pigging) operations. See Hollidaysburg Renewal Memo, Plainfield Renewal Memo, and Markelsburg Renewal Memo. Sunoco estimates each pumping station emits 24.2 tons per year of VOCs before controls. Hollidaysburg Permit File at 13 , Plainfield Permit File at 13 , and Markelsburg Permit File at 12 . By using flares to combust some of the VOCs, Sunoco has reported the potential to emit ("PTE") for each pumping station will not exceed 0.74 - 0.87 tons per year of VOCs. Id . That number, quite simply, is wrong. The Council is very concerned that emissions have been underestimated in these permit applications.	Per 6/2/20 Sunoco email, "*The manufacturer gurantees a minimum DRE of 98%.*" and "*The flares were installed and are maintained per manufacturer's recommendations*." DEP notes that Sunoco conducted a test of a similar John Zink Flare system at the Sunoco No. 2 Tank Farm located in Delaware County on 4/26/16 to verify destruction removal efficiency (DRE). Results of the test demonstrated a 99.996% average DRE of the flare. DEP has accepted the manufacturer's guaranteed design destruction and removal efficiency of 98% for the sites referenced here. DEP believes that this approach to estimating emissions from the West Cornwall station is both reasonable, and environmentally conservative.
21	PTE, by definition, only includes control technology that provides enforceable limitations or effects. Footnote: 14 25 Pa. Code 121.1 provides in relevant part that "potential to emit" is defined as: The maximum capacity of a source to emit a pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution control equipment and limitations on hours of operation or on the type or amount of material combusted, stored or processed shall be treated as part of the design if the limitation or the effect it would have on emissions is Federally enforceable or legally and practicably enforceable by an operating permit condition. The term does not include secondary emission from an offsite facility.	In response to this comment, DEP has added the following new permit condition to Section E of each of the pending permits, in order to ensure that the permits each contain a legally and practically enforceable requirement to operate the flare: *a.) The flare shall be operated at all times that the Source 103 Maintenance (Pigging) Operation is operating.* *b) The flare shall be operated continuously when the motor operated valve (MOV) is open between the knock out tank and the flare. Emissions from the knockout tank shall not be released directly to atmosphere, but shall rather all be routed to the flare.* *c.) The permittee shall keep records sufficient to document compliance with a.) and b.) above, and shall notify DEP within 30 days of the end of each calendar half period if the requirements of either a.) or b.) were not met during that period.* DEP also believes it is appropriate to revise the Section C conditions of each of the pending Sunoco permits to make them consistent with the Section C language used in the several other Sunoco pump station permits that were issued in 2017.
22	Sunoco's PTE calculation has not been verified and there is thus no reason to believe it can be enforced.	See the response to Comments 20 (flare DRE) and 21 (enforceability).
23	Sunoco's emissions calculations are based on its assertion that the max heat input rated 10 MMBTU/hr John Zink ZTOF04X30PF enclosed flares installed at each pumping station as control technology operate at 99.9% efficiency for all operating scenarios that Sunoco identified in the application. Id. at 27 .	See the response to Comments 20 (flare DRE) and 21 (enforceability).
24	However, the testing scenarios for which 99.9% efficiency was demonstrated model testing data on a ZTOF025X15PF, not the ZTOF04X30PF unit described in the original permit applications, and do not match the scenarios for which the flares will be used; i.e., for control of emissions from pump seal leaks. Id. at 218-228 .	See the response to Comments 20 (flare DRE) and 21 (enforceability).
25	The 99.9% efficiency assumption is wholly unsupported in the context of the present permits.	See the response to Comments 20 (flare DRE) and 21 (enforceability).
26	The disparity between testing and actual use scenarios becomes orders of magnitude more egregious when looking at controlling emissions from pump seal leaks.	See the response to Comments 20 (flare DRE) and 21 (enforceability).

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#	Comment	DEP Response
27	Large releases of gases at the pumping stations are fairly infrequent. Under regular operations, emissions will come from the constant leaking of the product-lubricated pump seals. Id. at 56-58 . Pump seal leaks, a consequence of operating the pump per manufacturer's specifications, will be directed to the flares to burn off. The emissions directed to the flares from leaking pump seals are a much smaller volume than the emissions from operations that release higher quantities of gas (such as emergencies, inventory changes, or maintenance operations) at any given time.	See the response to Comments 20 (flare DRE) and 21 (enforceability).
28	The manufacturer suggests that a properly operating pump seal could leak 0.5 scf/m of product, whatever product is in the pump at the time, into the collection system routed to the control device. Id . These uncontrolled emissions range from 2 to 5 pounds per hour of product, depending on the product being transported. However, cumulatively over the course of a year, leaks from pump seals represent a far greater source of emissions sent through the flares than maintenance operations - 262,800 scf per year of gas leaked through pump seals, verses 53,880 scf per year of gas released through maintenance operations. Id .	See the response to Comments 20 (flare DRE) and 21 (enforceability).
29	The flares have not been built to handle the constant trickle of VOCs from pump seals, which will amount to approximately 0.01% of the flare capacity, or in terms of a turndown ratio, a staggering 10,000:1. The efficiency of the flares in this constant, ultra-low-flow scenario is completely untested and unknown.	See the response to Comments 20 (flare DRE) and 21 (enforceability).
30	Nevertheless, Sunoco has wrongly applied the same 99.9% efficiency rate that was tested for a high flow scenario to the pump seal leak emissions as well.	See the response to Comments 20 (flare DRE) and 21 (enforceability).
31	The updated efficiency number does not change the fact that no testing has been done for a turndown ratio of 10,000:1 or, for that matter, any scenario that even approaches comparable operating conditions.	See the response to Comments 20 (flare DRE) and 21 (enforceability).
32	Given the substantial volume of VOC emissions at stake here, fully understanding the efficiency of the control technology is crucial to this permitting process.	See the response to Comments 20 (flare DRE) and 21 (enforceability).
33	Without any relevant testing to demonstrate how the flares would function in actual operating conditions, it would be irresponsible and unlawful for the Department to issue renewal permits at this time.	See the response to Comments 20 (flare DRE) and 21 (enforceability).
34	By the same rationale, the pumping stations should not be operating while Sunoco awaits the issuance of these permits; Sunoco used the same unsupported efficiency projections in its original Permits.	See the response to Comments 20 (flare DRE) and 21 (enforceability).
35	4. Sunoco Should Account for Deinventory Operations in Emissions Calculations	Per 6/2/20 Sunoco email, "*Sunoco Pipeline, L.P. accounts for emissions associated with unforeseeable emergency events through RFDs or de minimis notifications. It is not possible to permit for an emergency without knowing information, including but not limited to, the size, scope, duration and location of such events. These emergency events are the reason other regulatory processes such as RFDs or de minimis notifications exist. A planned deinventory presents a similar challenge, because flaring can occur at different pump stations or valve sites depending on operations and other conditions. This is another case in which other regulatory processes such as RFDs or de minimis notifications will be used to account for these emissions.*" DEP concurs with this approach.

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#	Comment	DEP Response
36	As the Department is well aware, in the course of pipeline operation, emergencies and maintenance needs occasionally make it necessary to evacuate product from large segments of pipeline that span between pumping stations or valve sites. Sunoco accounts for releases of gas due to the maintenance (pigging) events per year in all three of the permit renewal applications.	See the response to Comment 35 (emergency and deinventory).
37	To add to the confusion, the permit renewal applications state the flare destruction efficiency is 98% instead of the 99.9% noted in the original applications. See Hollidaysburg Renewal Memo , Plainfield Renewal Memo , and Markelsburg Renewal Memo . It is not known why or how this figure changed.	See the response to Comments 20 (flare DRE) and 35 (emergency and deinventory).
38	For purposes of this discussion, the Council believes neither 98% nor 99.9% destruction efficiency is accurate due to the off-site testing conditions being wholly different than the conditions at which the flares would be used at the pumping stations. See Hollidaysburg Renewal Memo , Plainfield Renewal Memo , and Markelsburg Renewal Memo .	See the response to Comments 20 (flare DRE) and 21 (enforceability).
39	However, nowhere in the renewal applications or in the original permits is a large-scale deinventory or emergency evacuation contemplated.	See the response to Comment 35 (emergency and deinventory).
40	This sort of large-scale pipeline deinventory would involve a greater volume of gas than could be sent through the flares in a reasonable amount of time and would require the availability of extra equipment.	See the response to Comment 35 (emergency and deinventory).
41	While Sunoco accounts for "maintenance operations," it fails to provide necessary equipment or related emissions in its permit applications for emergency or deinventory emissions processes.	See the response to Comment 35 (emergency and deinventory).
42	Deinventory is foreseeable, has been accounted for in other Department permits in the pipeline and terminals industry, and thus must be included in operating permits as an operating scenario, complete with emissions calculations.	See the response to Comment 35 (emergency and deinventory).
43	The substantial volume of product involved in such deinventories also make these events particularly significant in terms of potential emissions release.	See the response to Comment 35 (emergency and deinventory).
44	Protections must be in place to assure public safety in such events, and this cannot be achieved unless Sunoco provides such complete information in its applications.	See the response to Comment 35 (emergency and deinventory).
45	5. The Renewal Permits Should Be Withheld for Resolution of Discrepancies	See the responses to Comments 49-56, wherein the specific alleged discrepancies are addressed.
46	The Council notes discrepancies in all three stations' permit renewal applications from their original Permits.	See the response to Comment 45 (discrepancies).
47	Such discrepancies, or errors, lead one to be wary of the accuracy of other representations in the original Permits or renewal applications.	See the response to Comment 45 (discrepancies).
48	If anything, the renewal permits should be withheld to resolve errors or inaccuracies.	See the response to Comment 45 (discrepancies).
49	First, all three renewal applications note the "site source inventory" to include Source 101 (for pump station seal leaks) and Source 103 (for maintenance (pigging) operation). See Hollidaysburg Renewal Memo , Plainfield Renewal Memo , and Markelsburg Renewal Memo . However, all three pump stations' original Permits include "fugitive emissions from seal leaks" as part of the site inventory. Hollidaysburg Permit File at 16 , Plainfield Permit File at 16 , and Markelsburg Permit File at 16. The Council questions why these fugitive emissions are somehow now removed from the emissions inventory for each of these stations. None of the permit renewal applications discuss adding new technology or equipment to capture all of the fugitive seal leaks at the stations. Thus, the Council asserts this is either an omission or an error, but in either case, it creates inaccuracies in the emissions calculations for the stations.	The Source ID 102, Fugitive Emissions from Seal Leaks, in the 2014 permit application is included in the operating permit Source 101, Pump Station Seal Leaks. The Source ID Z101, Fugitive Emissions, are included in the site inventory.

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#	Comment	DEP Response
50	This discrepancy does not make issuing renewal permits at this time a sound decision and they should be withheld until this information is corrected and/or explained.	See the response to Comment 49 (seal leaks).
51	Second, all three of the original Permits of the Hollidaysburg, Markelsburg, and Plainfield stations and the renewal permit applications present a discrepancy regarding the John Zink LLC enclosed flare. The original Permits for these pumping stations state a John Zink LLC ZTOF04X30PF flare with a 99.9% efficiency capture is part of the technology used to curtail VOC emissions. Id. at 27. However, the permit renewal applications discuss the pumping stations each using John Zink LLC flares with "removal efficiencies" of 98%. See Hollidaysburg Renewal Memo , Plainfield Renewal Memo , and Markelsburg Renewal Memo .This change in flare efficiency calls into question if the flare equipment has changed or if the destruction efficiency quoted is correct.	Per 6/2/20 Sunoco email, "*The flare model was not replaced or changed. Administrative updates were submitted for all sites in September 2016 that changed the DRE of the flare from 99.9% to 98% based upon manufacturer's design specifications, as agreed upon by PA DEP.*" See also the response to Comment 20 (flare DRE).
52	If the latter, the Council questions whether the emissions level quoted from flare use is accurate.	See the response to Comment 20 (flare DRE).
53	If the equipment has changed since the original Permits were issued, the Council requests the renewal applications be updated with the flare model and emissions levels from testing done at current operating conditions to justify the destruction efficiency.	See the response to Comments 20 and 51 (flare DRE).
54	Furthermore, if Sunoco operates the pumping stations with technology different than what is described in the original Permits, then the Council asserts Sunoco may be violating such Permits due to potentially higher emissions.	See the response to Comments 20 and 51 (flare DRE).
55	Because no real-world testing was performed on the flares to justify either efficiency rate, the permit renewal applications cannot state 99.9% or 98% efficiency is accurate.	See the response to Comment 20 (flare DRE).
56	Thus, regardless of what the flares' efficiency rates are, stack testing should be performed to get accurate, applicable emissions data.	See the response to Comments 20 (flare DRE) and 58 (stack testing).
57	Either way, the renewal permits should be withheld for explanation of an equipment change, updated information on the model of the flare, and reevaluation of the emissions levels in contemplation of utilizing a flare with a lower destruction efficiency.	See the response to Comment 45 (discrepancies).
58	Stack Tests Should Be Conducted to Determine Actual Emissions Levels.	DEP does not believe that further stack testing is necessary or appropriate given the size and nature of the sources.
59	The Hollidaysburg, Markelsburg, and Plainfield pumping stations are already in operation, as are other pumping stations along the pipeline route. That means VOCs and other pollutants are already being emitted from these stations in unverified quantities based on inaccurate claims of flare efficiency.	See the response to Comment 20 (flare DRE).
60	To protect the health and welfare of those living near the pumping stations, it is critical that regular stack tests be conducted so the Department and communities are aware of the actual emission levels.	See the response to Comment 58 (stack testing).
61	Even though the pumping stations have the same flares, efficiency can vary based on a number of factors, including how the flares were installed, configured, and maintained. Thus, initial stack testing to verify Sunoco's emissions assumptions, as well as regular stack testing to verify ongoing operation, at each site is appropriate and necessary.	See the response to Comment 58 (stack testing).
62	This is especially true in light of the absence of information provided by Sunoco regarding flare efficiency under normal operating scenarios and the anticipated increase in pipeline operating pressure.	See the response to Comments 7 (no change in ME1 pressure), 20 (flare DRE) and 58 (stack testing).
63	It appears as though the Department and Sunoco realize this need for regular stack testing because, in all three of the renewal permit memos, "updated stack testing submittals" is listed as a proposed change to Condition 009(h), Duty to Provide Information. See Hollidaysburg Renewal Memo , Plainfield Renewal Memo , and Markelsburg Renewal Memo .	This comment refers to a standard DEP permit condition placed in permits which is not applicable in this case, so long as no stack testing is required in the permit.

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#	Comment	DEP Response
64	The Council wishes this proposed change become a reality in any renewal of or new State-Only Operating Permit for pumping stations along the Mariner East pipelines.	See the response to Comment 63 (standard condition).
65	Conclusion. In light of the forgoing concerns, and especially because of Sunoco's lack of regard for risks to public safety in changing pipeline design, the Council strongly urges the Department to withhold issuing all three permit renewals at the present time.	See the response to Comments 7 (no change in ME1 pressure), 20 (flare DRE) and 58 (stack testing). DEP believes it is appropriate to proceed to issuance of these permits.
66	The Department should require Sunoco to submit applications that accurately account for all public safety concerns as well as additional emissions.	See the response to Comments 7 (no change in ME1 pressure) and 20 (flare DRE).
67	This means disclosing all necessary operating parameters, equipment, and conducting and providing the results of relevant tests of the equipment and control technology.	See the response to Comments 7 (no change in ME1 pressure), 20 (flare DRE) and 58 (stack testing).
68	After considering complete applications, if the Department wishes to issue these permit renewals, the Council asks that the Department allow for additional public comment on the revised applications and that the permits include actual stack testing data.	DEP believes that the statutory comment period has provided appropriate opportunity for public comment. See also the response to Comments 20 (flare DRE) and 58 (stack testing).
69	In the meantime, because equipment is under-designed for the conditions Sunoco choses to operate it at and emissions are unverified and pose a risk to public health, it is not appropriate for the pumping stations to be operating.	The commenter has provided no support for the assertion in this comment that the emissions pose a risk to public health. To the contrary, DEP has determined that the emissions are of minor significance with regard to causing air pollution. See also the response to Comments 7 (no change in ME1 pressure), 20 (flare DRE) and 58 (stack testing).

Weaver, William (DEP)

From: Hartline, Darrell
Sent: Thursday, July 30, 2020 8:13 AM
To: Werner, Jed A
Subject: RE: [External] RE: Holidaysburg, Markelsburg & Plainfield Draft Permits

Yes, that is true.

From: Werner, Jed A <JED.WERNER@energytransfer.com>
Sent: Thursday, July 30, 2020 8:12 AM
To: Hartline, Darrell <dahartline@pa.gov>
Cc: Sion, Lauren N <LAUREN.SION@energytransfer.com>
Subject: RE: [External] RE: Holidaysburg, Markelsburg & Plainfield Draft Permits

Darrell,

Thank you for your response. To clarify, since these facilities are Natural Minor Permits, Section B, conditions #023 and #024, are not applicable to these sites.

We have no further comments.

Jed

From: Hartline, Darrell <dahartline@pa.gov>
Sent: Thursday, July 30, 2020 8:05 AM
To: Werner, Jed A <JED.WERNER@energytransfer.com>
Cc: Sion, Lauren N <LAUREN.SION@energytransfer.com>
Subject: RE: [External] RE: Holidaysburg, Markelsburg & Plainfield Draft Permits

Jed,

The following are our responses:

Item 1 – this condition is addressing Synthetic Minor permits. The SPLP operating permits are Natural Minor permits.
Item 2 – this condition is addressing Synthetic Minor permits. The SPLP operating permits are Natural Minor permits.
Item 3 – DEP concurs that the facility has been operating for an extended time with no reported problems that would suggest the need for weekly monitoring. Therefore the frequency in (a) of this condition will be changed to monthly, (c) will be deleted, and (d) will be re-lettered as (c).
Item 4 - DEP wants all the SPLP operating permits to be written consistently. The current Blainsport operating permit (36-03197) was used for the Section C conditions.
Item 5 – I removed “vented” and replaced it with “routed” on all three (3) operating permits.

Regards,
Darrell Hartline

From: Werner, Jed A <JED.WERNER@energytransfer.com>
Sent: Thursday, July 23, 2020 1:08 PM

To: Hartline, Darrell <dahartline@pa.gov>
Cc: Sion, Lauren N <LAUREN.SION@energytransfer.com>
Subject: [External] RE: Holidaysburg, Markelsburg & Plainfield Draft Permits

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Darrell,

Thank you for the opportunity to review the DRAFT Permits. We have a couple comments/questions.

1. Section B, condition #023 references reporting required by 25 PA code 135.3. This is a new condition that was not in the previous permits. These are Natural Minor State Only Operating Permits. SPLP's understanding is that a annual emission report for the preceding calendar year is not required for these facilities.
2. Section B, condition #024 report format is dependent on the previous condition.
3. Section C, condition #009 states weekly monitoring for odors, visible and fugitive emissions, (25 PA code 127.441), with an option to request monthly monitoring after 6 months of weekly monitoring. SPLP requests that this monitoring be only required monthly. The current SOOP's only required monthly monitoring, and SPLP previously had inspections at these facilities demonstrating to PADEP inspectors compliance with the monthly monitoring requirements.
4. Section C, condition #010 new condition requiring the emissions for the entire facility on a 12-month rolling basis. Previous permits only required annual emissions and operating hours at the end of each calendar year. This facility is a natural minor SOOP.
5. Section E, condition #007b, emissions fro the knockout tank shall not be released directly to atmosphere, but shall rather be *vented* to the flare. SPLP requests the wording to be, *routed* to the flare, instead of vented to the flare.

We have no further comments regarding these permits.

Thank you

ENERGY TRANSFER

Jed A. Werner
Manager – Env. Compliance
525 Fritztown Road
Sinking Spring, PA 19608

office: 610-670-3297
cell: 610-858-0802

Forbes | 2019 AMERICA'S BEST LARGE EMPLOYERS

From: Hartline, Darrell <dahartline@pa.gov>
Sent: Monday, July 20, 2020 8:48 AM
To: Werner, Jed A <JED.WERNER@energytransfer.com>

Cc: Sion, Lauren N <LAUREN.SION@energytransfer.com>
Subject: Holidaysburg, Markelsburg & Plainfield Draft Permits

Jed,

We are ready to issue these permits but wanted to give you the opportunity to review them prior to issuance. The three permits are virtually the same except for Section C, Condition 022 where the site PTE is listed. I used the Blainsport permit as a model to revise Section C. The Section E, Condition 007 was added.

Please provide a response by this Friday, July 24.

Thanks,
Darrell Hartline
Private and confidential as detailed here. If you cannot access hyperlink, please e-mail sender.
Private and confidential as detailed here. If you cannot access hyperlink, please e-mail sender.

Weaver, William (DEP)

From: Werner, Jed A <JED.WERNER@energytransfer.com>
Sent: Wednesday, March 11, 2020 7:57 AM
To: Hartline, Darrell
Subject: Re: [External] Re: Plainfield Draft Permit

Yes.

We are changing Responsible Officials to Director's of the company.

Thank you for the response regarding the condition.

Sent from my iPhone

> On Mar 11, 2020, at 7:39 AM, Hartline, Darrell <dahartline@pa.gov> wrote:
>
> Jed,
>
> Should Richard Bishop be the Responsible Official?
>
> Regards,
> Darrell
>
> ---
>
> **From:** Hartline, Darrell
> **Sent:** Wednesday, March 11, 2020 7:28 AM
> **To:** Werner, Jed A <JED.WERNER@energytransfer.com>
> **Subject:** RE: [External] Re: Plainfield Draft Permit
>
> Jed,
>
> Our central office added Section B, Condition 023 and then later removed it. The malfunction condition is back where it was previously in Section C, Condition 016. See attachment. The same thing occurred on Hollidaysburg and Markelsburg.
>
> Regards,
> Darrell
>
> ---
>
> **From:** Werner, Jed A <JED.WERNER@energytransfer.com>
> **Sent:** Wednesday, March 11, 2020 6:04 AM
> **To:** Hartline, Darrell <dahartline@pa.gov>
> **Cc:** Sion, Lauren N <LAUREN.SION@energytransfer.com>
> **Subject:** [External] Re: Plainfield Draft Permit

ATTENTION: *This email message is from an external sender. Do not open links or attachments from unknown sources. To report suspicious email, forward the message as an attachment to CWOPA_SPAM@pa.gov.*

Darrell

I apologize for not responding earlier. I have been out of the office

Our company has concern with the wording of Section B, condition 23. The wording seems to indicate that all malfunctions are to be reported to the state, even if they do not cause an excess emission.

I will try and forward today wording that we have proposed

Jed

Sent from my iPhone

> On Mar 10, 2020, at 3:16 PM, Hartline, Darrell <dahartline@pa.gov> wrote:
>
> Jed,
>
> Do you have any comments?
>
> Thanks,
> Darrell
>
> ---
>
> **From:** Hartline, Darrell
> **Sent:** Monday, February 3, 2020 8:35 AM
> **To:** Werner, Jed A <JED.WERNER@energytransfer.com>
> **Subject:** Plainfield Draft Permit
>
> Jed,
>
> I have attached draft permit 21-03108 for your review. Please provide any comments by March 3.
>
> Thanks,
> Darrell Hartline
> <Sunoco Pipeline Plainfield 2-3-20.pdf>

Private and confidential as detailed here. If you cannot access hyperlink, please e-mail sender.
<Sunoco Pipeline Plainfield 3-11-20.pdf>

Private and confidential as detailed here. If you cannot access hyperlink, please e-mail sender.

March 6, 2020

Via e-mail to: thanlon@pa.gov

Thomas Hanlon
Facilities Permitting Chief
Department of Environmental Protection
Southcentral Regional Office
909 Elmerton Avenue
Harrisburg, PA 17110

Re: Sunoco Pipeline L.P. Hollidaysburg, Plainfield, and Markelsburg Stations Intent to Issue Renewals of State Only Operating Permit Nos. 07-03062, 21-03108, and 31-03035

Comments of Clean Air Council

Dear Mr. Hanlon,

Clean Air Council ("the Council") submits the following comments in response to the Pennsylvania Department of Environmental Protection's (the "Department") notice that it intends to issue renewals of the State Only Operating Permit Nos. 07-03062, 21-03108, and 31-03035 (the "Permits") of Sunoco Pipeline L.P. ("Sunoco"). The subject of each of the Permits is a pumping station which assists in the transportation of natural gas liquids ("NGLs") as part of the Mariner East 2 Pipelines. The pumping stations (the "Facilities") are located in Blair County (Hollidaysburg station), Cumberland County (Plainfield station), and Huntingdon County (Markelsburg station).

The Council is a non-profit environmental organization headquartered at 135 South 19th Street, Suite 300, Philadelphia, Pennsylvania, 19103. For more than 50 years, the Council has worked to improve air quality across Pennsylvania. The Council has thousands of members throughout the Commonwealth who support its mission to protect everyone's right to a healthy environment.

The Council is aware Sunoco is operating approximately eighteen pumping stations along the Mariner East 2 pipeline route, with many of these pumping stations relying on the same infrastructure and emissions control technology.[1] This comment is particularly important because the concerns raised herein are relevant not only to the renewal applications at hand, but also to the other permits of Sunoco's Mariner East 2 pumping stations across Pennsylvania. The

[1] A comparison of readily available original permits for the Doylesburg, West Cornwall, Mount Union, Middletown, Blainsport, and Beckersville pumping stations revealed that they all include the same pump and seal equipment. Such original permits are available at https://www.dep.pa.gov/About/Regional/SouthcentralRegion/Community%20Information/Pages/Sunoco%20Pipeline%20Pump%20Station.aspx

public is relying on the Department and the integrity of this permitting process to ensure that these pumping stations neither cause harm to the public nor diminish air quality, and specifically, to limit emissions of volatile organic compounds ("VOCs") and explosive natural gas liquids ("NGLs"), which are a particular threat to public health and safety. The Council appreciates this opportunity to bring these matters to the attention of the Department.

In the comments that follow, the Council discusses why the renewal permits all three pumping stations should be withheld for further assessment due to: 1.) explosion risks from higher operating pressures, 2.) unquantified higher emissions above permitted rates, 3.) and unquantified higher emissions levels from flare operation. The Council will also discuss the need for accounting for emissions from deinventory operations, resolving factual discrepancies in the Permits, and performing site stack testing to ensure emissions are appropriately limited.

Comments

1. The Renewal Permits Should Be Withheld for Further Assessment Due to Explosion Risks from Higher Operating Pressures

The Council requests that all three renewal permits be withheld pending further analysis, evaluation, and testing of the Facilities' ability to operate safely under pressure loads higher than those they were designed for. All three Permits regulate pumping stations designed to increase the pressure of NGLs in the Mariner East 2 pipelines[2] to transport them along the route. The Facilities include electric pumps that each have two seals. The Facilities' Permits were issued in 2015 on the basis of operating conditions as set forth in the original applications. *See Hollidaysburg Permit File, Plainfield Permit File,* and *Markelsburg Permit File*.[3] The renewal applications discuss no modification of pump or seal design or any changes to the operating pressure at the pump station or in the pipeline. *See Hollidaysburg Renewal Memo, Plainfield Renewal Memo,* and *Markelsburg Renewal Memo*.[4] In the original Permit applications, the pump seals were designed for a "Max Potential Box Pressure of 1480 PSIG." *Hollidaysburg Permit File* at 66*, Plainfield Permit File* at 66, and *Markelsburg Permit File* at 65.[5]

Since the issuance of the original permits, the Council learned that Sunoco plans to operate at least some segments of the Mariner East 2 pipelines at a maximum operating pressure of 2,100 psig. Sunoco documented this planned pressure change as early as 2018 in its Horizontal Directional Drill ("HDD") Reevaluation Reports for its 16" pipeline.[6] For example, in the HDD Reevaluation Report for the Norfolk Southern Railroad Crossing, the original HDD Plan drawing for the 16" pipeline notes an "internal design pressure [of] 1480 psig."[7] However,

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[2] Sunoco has used different terminology at different times for the various Mariner East pipes. Herein, the Council means to refer to any NGL pipes Sunoco may use in connection with the Facilities.

[3] Available internally. Documents were provided to the Council on a flash drive.

[4] Supra note 3.

[5] Supra note 3.

[6] Available at https://www.dep.pa.gov/Business/ProgramIntegration/Pennsylvania-Pipeline-Portal/Pages/HDD-Reevaluation-Reports.aspx

[7] *Horizontal Directional Drill Analysis, Norfolk Southern Railroad Crossing, PADEP Section 105 Permit No. E32-508*, Attachment 2: Horizontal Directional Drill Plan and Profiles, available at:

the revised HDD Plan drawing for the 16" pipeline states an "internal design pressure [of] 2100 psig."[8] This is no typographical error or accidental feature. Such design changes consistently exist throughout other HDD Reevaluation Reports.[9]

Because the maximum box pressure of the seals in the pumps at the Hollidaysburg, Plainfield, and Markelsburg stations is 1,480 psig, the Council expresses grave concerns about whether the Facilities can operate safely at 2,100 psig, which is 42% more than the maximum pressure for which the pump seals are designed. Operating the Facilities at such an increase in pressure would potentially cause seals to break down, shorten their useful life, or, even worse, completely fail. Such failures or breakdowns may lead to significant leaks or an explosion. Sunoco's planned increase in pipeline pressure puts not just the Hollidaysburg, Plainfield, and Markelsburg pumping stations at failure risk, but also the other pumping stations along the Mariner East 2 route due to their homogeneous design. The potential failure of the pump seals puts many lives at risk, as well as risking potential damage to surrounding infrastructure. Such risks are not hypothetical. In fact, an explosion occurred this past summer at a Sunoco pump station due to an excessive buildup of emissions from pump seals on the Mariner East 2 route.[10] This situation presents a completely unacceptable risk to the public. The most pressing step the Department should take is to withhold the permit renewals for further evaluation, analysis, and testing of the pipeline and 18 pumping stations due to Sunoco's planned pressure increase.

The Council notes that any increase in pressure Sunoco plans to impart on Mariner East 2 above 1,480 psig would violate the existing permits for all the pumping stations using Flowserve pumps and seals with the maximum potential box pressure of 1,480 psig. The Council believes almost all of the 18 pumping stations use this equipment as permitted and any major operation changes in the pipeline would cause violations of such permits because certain operational changes may lead to changes in emissions. The Council urges the Department to withhold issuing the Hollidaysburg, Plainfield, and Markelsburg stations permit renewals in light of this and requests that Sunoco submit new applications with updated operation conditions, emissions data, and testing results in furtherance of the pressure Sunoco intends to impart on the pipelines.

2. The Renewal Permits Should Be Withheld for Further Evaluation Due to Expected Unquantified Higher Emissions Above Permitted Rates

The Council further requests that all three renewal permits be withheld due to an unknown higher level of emissions from the Facilities resulting from increasing the Mariner East

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http://files.dep.state.pa.us/ProgramIntegration/PA%20Pipeline%20Portal/MarinerEastII/HDD_Reevaluation_Reports/S2-0040%20-%20Norfolk%20Southern%20Railroad%20Crossing%20-%20PA-IN-0019.0000-RR%20-%20E32-508.pdf

[8] *Id*.

[9] *See, for example, Horizontal Directional Drill Analysis, Appalachian Drive Crossing, PADEP Section 105 Permit No. E21-449*, Attachment 2: Original Horizontal Directional Drill Plan and Profile, available at: http://files.dep.state.pa.us/ProgramIntegration/PA%20Pipeline%20Portal/MarinerEastII/HDD_Reevaluation_Reports/AppalachianDriveCrossing/Appalachian%20Drive%20Crossing%20-%20S2-0240.pdf

[10] *See Pipeline Experts Say Vapor Buildup Likely Led to Explosion at Chester County Pump Station* available at https://stateimpact.npr.org/pennsylvania/2019/08/07/pipeline-experts-say-vapor-buildup-likely-led-to-explosion-at-chester-county-pump-station/

2 pressure. As noted above, if Sunoco plans to operate the pipeline at a pressure of 2,100 psig, the existing pump seals may not perform properly or may fail. Setting aside the catastrophic concerns of this, another consequence is that the seals will be strained at higher pressures, resulting in higher expected losses of pipeline product, including VOCs. The current renewal applications for the Hollidaysburg, Plainfield, and Markelsburg stations note the anticipated VOCs emitted to be 0.87, 0.76, and 0.74 tons per year (respectively) under the originally proposed operating conditions of 1,480 psig pipeline pressure. *See Hollidaysburg Renewal Memo, Plainfield Renewal Memo,* and *Markelsburg Renewal Memo*.[11] If Sunoco increases the pressure of the pipelines by 42%, the emissions expected should be much higher, but how much higher is unknown and likely a factor of how well the seals function at 42% above their maximum potential box pressure. Because the quantity of emissions at a higher pipeline pressure is unknown, the Council asserts all of the current renewal applications' estimated potential emissions are erroneous. The Council urges the Department to remedy this by withholding the renewal permits until Sunoco updates the applications in light of the pressure increase.

3. The Renewal Permits Should Be Withheld for Further Evaluation of Emissions Levels from Flare Operation

Sunoco has identified two ways in which its pumping stations generate emissions, and in particular, emissions of VOCs: pump station seal leaks and maintenance (pigging) operations. *See Hollidaysburg Renewal Memo, Plainfield Renewal Memo,* and *Markelsburg Renewal Memo*. [12] Sunoco estimates each pumping station emits 24.2 tons per year of VOCs before controls. *Hollidaysburg Permit File* at 13*, Plainfield Permit File* at 13*,* and *Markelsburg Permit File* at 12*.* [13] By using flares to combust some of the VOCs, Sunoco has reported the potential to emit ("PTE") for each pumping station will not exceed 0.74 - 0.87 tons per year of VOCs. *Id*. That number, quite simply, is wrong. The Council is very concerned that emissions have been underestimated in these permit applications.

PTE, by definition, only includes control technology that provides enforceable limitations or effects.[14] Sunoco's PTE calculation has not been verified and there is thus no reason to believe it can be enforced. Sunoco's emissions calculations are based on its assertion that the max heat input rated 10 MMBTU/hr John Zink ZTOF04X30PF enclosed flares installed at each pumping station as control technology operate at 99.9% efficiency for all operating scenarios that Sunoco identified in the application. *Id. at 27*. However, the testing scenarios for which 99.9%

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[11] Supra note 3.

[12] Supra note 3.

[13] Supra note 3.

[14] 25 Pa. Code 121.1 provides in relevant part that "potential to emit" is defined as:

> The maximum capacity of a source to emit a pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution control equipment and limitations on hours of operation or on the type or amount of material combusted, stored or processed shall be treated as part of the design if the limitation or the effect it would have on emissions is Federally enforceable or legally and practicably enforceable by an operating permit condition. The term does not include secondary emission from an offsite facility.

efficiency was demonstrated model testing data on a ZTOF025X15PF, not the ZTOF04X30PF unit described in the original permit applications, and do not match the scenarios for which the flares will be used; i.e., for control of emissions from pump seal leaks. *Id. at 218-228*. The 99.9% efficiency assumption is wholly unsupported in the context of the present permits.[15]

The disparity between testing and actual use scenarios becomes orders of magnitude more egregious when looking at controlling emissions from pump seal leaks. Large releases of gases at the pumping stations are fairly infrequent. Under regular operations, emissions will come from the constant leaking of the product-lubricated pump seals. *Id. at 56-58*. Pump seal leaks, a consequence of operating the pump per manufacturer's specifications, will be directed to the flares to burn off. The emissions directed to the flares from leaking pump seals are a much smaller volume than the emissions from operations that release higher quantities of gas (such as emergencies, inventory changes, or maintenance operations) at any given time. The manufacturer suggests that a properly operating pump seal could leak 0.5 scf/m of product, whatever product is in the pump at the time, into the collection system routed to the control device. *Id*. These uncontrolled emissions range from 2 to 5 pounds per hour of product, depending on the product being transported. However, cumulatively over the course of a year, leaks from pump seals represent a far greater source of emissions sent through the flares than maintenance operations - 262,800 scf per year of gas leaked through pump seals, verses 53,880 scf per year of gas released through maintenance operations. *Id*. The flares have not been built to handle the constant trickle of VOCs from pump seals, which will amount to approximately 0.01% of the flare capacity, or in terms of a turndown ratio, a staggering 10,000:1. The efficiency of the flares in this constant, ultra-low-flow scenario is completely untested and unknown. Nevertheless, Sunoco has wrongly applied the same 99.9% efficiency rate that was tested for a high flow scenario to the pump seal leak emissions as well. The updated efficiency number does not change the fact that no testing has been done for a turndown ratio of 10,000:1 or, for that matter, any scenario that even approaches comparable operating conditions.

Given the substantial volume of VOC emissions at stake here, fully understanding the efficiency of the control technology is crucial to this permitting process. Without any relevant testing to demonstrate how the flares would function in actual operating conditions, it would be irresponsible and unlawful for the Department to issue renewal permits at this time. By the same rationale, the pumping stations should not be operating while Sunoco awaits the issuance of these permits; Sunoco used the same unsupported efficiency projections in its original Permits.

4. Sunoco Should Account for Deinventory Operations in Emissions Calculations

As the Department is well aware, in the course of pipeline operation, emergencies and maintenance needs occasionally make it necessary to evacuate product from large segments of pipeline that span between pumping stations or valve sites. Sunoco accounts for releases of gas due to the maintenance (pigging) events per year in all three of the permit renewal applications.

[15] To add to the confusion, the permit renewal applications state the flare destruction efficiency is 98% instead of the 99.9% noted in the original applications. *See Hollidaysburg Renewal Memo*, *Plainfield Renewal Memo*, and *Markelsburg Renewal Memo*. It is not known why or how this figure changed. For purposes of this discussion, the Council believes neither 98% nor 99.9% destruction efficiency is accurate due to the off-site testing conditions being wholly different than the conditions at which the flares would be used at the pumping stations.

See Hollidaysburg Renewal Memo, *Plainfield Renewal Memo*, and *Markelsburg Renewal Memo*.[16] However, nowhere in the renewal applications or in the original permits is a large-scale deinventory or emergency evacuation contemplated. This sort of large-scale pipeline deinventory would involve a greater volume of gas than could be sent through the flares in a reasonable amount of time and would require the availability of extra equipment. While Sunoco accounts for "maintenance operations," it fails to provide necessary equipment or related emissions in its permit applications for emergency or deinventory emissions processes. *Id.* Deinventory is foreseeable, has been accounted for in other Department permits in the pipeline and terminals industry, and thus must be included in operating permits as an operating scenario, complete with emissions calculations. The substantial volume of product involved in such deinventories also make these events particularly significant in terms of potential emissions release. Protections must be in place to assure public safety in such events, and this cannot be achieved unless Sunoco provides such complete information in its applications.

5. The Renewal Permits Should Be Withheld for Resolution of Discrepancies

The Council notes discrepancies in all three stations' permit renewal applications from their original Permits. Such discrepancies, or errors, lead one to be wary of the accuracy of other representations in the original Permits or renewal applications. If anything, the renewal permits should be withheld to resolve errors or inaccuracies. First, all three renewal applications note the "site source inventory" to include Source 101 (for pump station seal leaks) and Source 103 (for maintenance (pigging) operation). *See Hollidaysburg Renewal Memo*, *Plainfield Renewal Memo*, and *Markelsburg Renewal Memo*.[17] However, all three pump stations' original Permits include "fugitive emissions from seal leaks" as part of the site inventory. *Hollidaysburg Permit File* at 16*, Plainfield Permit File* at 16*,* and *Markelsburg Permit File* at 16.[18] The Council questions why these fugitive emissions are somehow now removed from the emissions inventory for each of these stations. None of the permit renewal applications discuss adding new technology or equipment to capture *all* of the fugitive seal leaks at the stations. Thus, the Council asserts this is either an omission or an error, but in either case, it creates inaccuracies in the emissions calculations for the stations. This discrepancy does not make issuing renewal permits at this time a sound decision and they should be withheld until this information is corrected and/or explained.

Second, all three of the original Permits of the Hollidaysburg, Markelsburg, and Plainfield stations and the renewal permit applications present a discrepancy regarding the John Zink LLC enclosed flare. The original Permits for these pumping stations state a John Zink LLC ZTOF04X30PF flare with a 99.9% efficiency capture is part of the technology used to curtail VOC emissions. *Id.* at 27.[19] However, the permit renewal applications discuss the pumping stations each using John Zink LLC flares with "removal efficiencies" of 98%. *See Hollidaysburg Renewal Memo*, *Plainfield Renewal Memo*, and *Markelsburg Renewal Memo*.[20]

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[16] Supra note 3.
[17] Supra note 3.
[18] Supra note 3.
[19] Supra note 3.
[20] Supra note 3.

This change in flare efficiency calls into question if the flare equipment has changed or if the destruction efficiency quoted is correct. If the latter, the Council questions whether the emissions level quoted from flare use is accurate. If the equipment has changed since the original Permits were issued, the Council requests the renewal applications be updated with the flare model and emissions levels from testing done at current operating conditions to justify the destruction efficiency. Furthermore, if Sunoco operates the pumping stations with technology different than what is described in the original Permits, then the Council asserts Sunoco may be violating such Permits due to potentially higher emissions. Because no real-world testing was performed on the flares to justify either efficiency rate, the permit renewal applications cannot state 99.9% or 98% efficiency is accurate. Thus, regardless of what the flares' efficiency rates are, stack testing should be performed to get accurate, applicable emissions data. Either way, the renewal permits should be withheld for explanation of an equipment change, updated information on the model of the flare, and reevaluation of the emissions levels in contemplation of utilizing a flare with a lower destruction efficiency.

6. Stack Tests Should Be Conducted to Determine Actual Emissions Levels

The Hollidaysburg, Markelsburg, and Plainfield pumping stations are already in operation, as are other pumping stations along the pipeline route. That means VOCs and other pollutants are already being emitted from these stations in unverified quantities based on inaccurate claims of flare efficiency. To protect the health and welfare of those living near the pumping stations, it is critical that regular stack tests be conducted so the Department and communities are aware of the actual emission levels. Even though the pumping stations have the same flares, efficiency can vary based on a number of factors, including how the flares were installed, configured, and maintained. Thus, initial stack testing to verify Sunoco's emissions assumptions, as well as regular stack testing to verify ongoing operation, at each site is appropriate and necessary. This is especially true in light of the absence of information provided by Sunoco regarding flare efficiency under normal operating scenarios and the anticipated increase in pipeline operating pressure. It appears as though the Department and Sunoco realize this need for regular stack testing because, in all three of the renewal permit memos, "updated stack testing submittals" is listed as a proposed change to Condition 009(h), Duty to Provide Information. *See Hollidaysburg Renewal Memo*, *Plainfield Renewal Memo*, and *Markelsburg Renewal Memo*.[21] The Council wishes this proposed change become a reality in any renewal of or new State-Only Operating Permit for pumping stations along the Mariner East pipelines.

Conclusion

In light of the forgoing concerns, and especially because of Sunoco's lack of regard for risks to public safety in changing pipeline design, the Council strongly urges the Department to withhold issuing all three permit renewals at the present time. The Department should require Sunoco to submit applications that accurately account for all public safety concerns as well as additional emissions. This means disclosing all necessary operating parameters, equipment, and conducting and providing the results of relevant tests of the equipment and control technology. After considering complete applications, if the Department wishes to issue these permit

[21] Supra note 3.

renewals, the Council asks that the Department allow for additional public comment on the revised applications and that the permits include actual stack testing data. In the meantime, because equipment is under-designed for the conditions Sunoco choses to operate it at and emissions are unverified and pose a risk to public health, it is not appropriate for the pumping stations to be operating.

Thank you for the opportunity to comment. Please keep us apprised of any future action related to the renewals of Permit Nos. 21-03108, 07-03062, and 31-03035.

Sincerely,

_____

Joseph Otis Minott, Esq.
Executive Director & Chief Counsel
Clean Air Council
135 S. 19th St., Suite 300
Philadelphia, PA 19103
215-567-4004
joe_minott@cleanair.org

pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

MEMO

FROM Darrell Hartline DH 1/29/20
Permitting Section
Air Quality Program

TO William Weaver WRW 2/3/20
Regional Manager
Air Quality Program

THRU Thomas Hanlon, Chief TJH 1/31/20
Permitting Section
Air Quality Program

DATE January 29, 2020

RE Permit 21-03108
Sunoco Pipeline, LP
Plainfield
Lower Frankford Township
Cumberland County

Background/Facility Description

On August 29, 2019, Sunoco Pipeline, LP submitted an application for the renewal of their state-only permit for their Plainfield pumping site on the Mariner East Pipeline in Lower Frankford Township. The proposed site source inventory is as follows:

Source	Name
101	Pump Station Seal Leaks
103	Maintenance (Pigging) Operation

Emissions Calculations and Control Equipment

Control C101, Enclosed Flare, controls Source 101, Pump Station Seal Leaks, and Source 103, Maintenance (Pigging) Operation.

Potential Emissions:

NOx	0.06 tons
CO	0.24 tons
VOC	0.76 tons

The emissions are based on a flare destruction efficiency of 98% and AP 42 Industrial Flares Tables 13.5-1 & -2.

Regulatory Analysis

The facility is not subject to 40 CFR Part 60 Subpart OOOO – Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution since it does not regulate pump stations.

The facility is not subject to 40 CFR Part 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines or 40 CFR Part 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines since the pumps are powered electrically.

Operating Permit Revisions/RFDs

The current permit for this facility was issued on February 6, 2015 and nominally expires on February 29, 2020.

There are no recent Plan Approvals that need to be incorporated into the permit.

RFD #2083 was approved for the additional equipment for cleaning and inspection of the pipeline.

The following changes are proposed in the draft renewal permit:

1. Cover Sheet – updated the responsible official and permit contact person.
2. Section B, Condition 023: new statewide boilerplate condition was added to address malfunction reporting.
3. Section C, Condition 009(a) – updated protocol requirements. Condition 009(h) – updated stack test submittals. Condition 016 – malfunction condition was revised to include only regional phone number references, since the other malfunction provisions have been moved to Section B Condition 023.
4. Section H – added permit status statement and reference to RFD #2083..

Compliance History

The last inspection was conducted on December 17, 2019. No air quality violations were noted.

Conclusions and Recommendations

The compliance history form was received on August 29, 2019. Lower Frankford Township and Cumberland County were notified on or before August 29, 2019. There was no confidential information included in the application. A notice will be published in the PA Bulletin.

I recommend that a Natural Minor (State Only) permit be distributed for review.

cc: Altoona District/SC Region 21-03108, B3

pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

August 30, 2019

Mr. Mark Martin
Sunoco Pipeline LP
525 Fritztown Road
Sinking Spring, PA 19608-1509

Re: Acceptance Letter
Sunoco Pipeline/Plainfield
OPERATING PERMIT NUMBER: 21-03108
APS ID# 843707, AUTH ID# 1285922
Lower Frankford Township, Cumberland County

Dear Mr. Martin:

The Department of Environmental Protection (DEP) has reviewed the above referenced application for completeness. The completeness review is the first step in a series of reviews conducted by DEP.

The Department has determined that the application package contains sufficient detail to enable DEP to conduct the technical review, and has been accepted for that purpose.

This is not a final action by the Department on this application. The completeness review is the first in a series of reviews conducted by DEP. The application will now move to the technical review stage of the permit review process. To follow your application through the review process, please visit *eFACTS on the Web* at:

http://www.ahs.dep.pa.gov/eFactsWeb/default.aspx.

I hope you find this information helpful in understanding the permit review process. If you have additional questions about your application, please contact Thomas Bianca at 717.705.4863 and refer to Application No. 843707, and Authorization No. 1285922.

Sincerely,

William R. Weaver

William R. Weaver
Air Quality Program Manager

cc: SCRO, 21-03108, B3
York District

Sunoco Pipeline, LP
525 Fritztown Road
Sinking Spring, PA 19608

August 18, 2019

CERTIFIED MAIL

Mr. William Weaver
Air Quality Program Manager
PADEP – South-central Regional Office
909 Elmerton Ave.
Harrisburg, PA 17110-8200

RE: Sunoco Pipeline, LP/Plainfield Pump Station
Lower Frankford Township, Cumberland County State
Only Operating Permit 21-03108

Dear Mr. Weaver:

In accordance with Section B, Condition #003 of the referenced permit, this application package is being submitted for the Sunoco Pipeline, LP – Plainfield Pump Station. This includes the State Only Operating Permit Application (in duplicate), applicable fee, APCA Compliance Review Form, and copies of the required municipal notifications.

As part of this renewal SPLP requests the following changes be made to the facility State-Only Operating Permit:

Responsible Official
Mark Martin
Pipeline Operations Supervisor
610-670-3278

Permit Contact Person
Lauren Sion
Environmental Specialist
412-784-3474

Should you have any questions regarding this application or require additional information, please contact me at 610-670-3297.

Sincerely,

Jed A. Werner
Air Permitting Manager

Enclosure
Cc: M. Martin

2700-PM-AQ0013 Rev. 8/2009

Please read instructions carefully before completing this application.

pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

BUREAU OF AIR QUALITY

STATE-ONLY PERMIT APPLICATION

FOR OFFICIAL USE ONLY
State Only OP Number:
Reviewed by:
Date:
Comments:

Section 1 - General Information

1.1 Application Type

Type of permit for which application is made: (Check one)

- ☐ Initial
- ☒ Renewal Operating Permit No. 21-03108
- ☐ Application Revision

1.2 Plant Information

Federal Tax ID: 23-3102656 **Firm Name:** SUNOCO PIPELINE LP/PLAINFIELD

Plant Code: 17 **Plant Name:** SUNOCO PIPELINE LP PLAINFIELD

NAICS Code: 486990 **SIC Code:** 4619

Description of NAICS Code: All Other Pipeline Transportation

Description of SIC Code: Trans. & Utilities - Pipelines, Nec

County: Cumberland **Municipality** Lower Frankford Township

Latitude: 40° 14 30.0000 **Longitude:** -77° 17 18.0000

Horizontal Reference Datum: Unknown

Horizontal Collection Method: Unknown

Reference Point: Unknown - The information is not known

1.3 Contact Information

Name: ~~MATTHEW GORDON~~ MARK MARTIN **Title:** ~~PROJECT MGR~~ SUPERVISOR - PIPELINE OPERATIONS

Address: 525 FRITZTOWN RD

SINKING SPRING, PA 19608-1509

Telephone Number: ~~(610) 670-3284~~ 610-670-3278

Email Address: Mark.Martin@energytransfer.com

1.4 Certification of Truth, Accuracy and Completeness

Note: This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate, and complete.

(Signed) Mark C Martin **Date:** 8/20/19

Please read instructions carefully before completing this application.

Name (Typed):	Mark A. Martin	**Title:**	Supervisor – Pipeline Operations

Please read instructions carefully before completing this application.

Section 2 - Site Information

2.1 Potential Emission Estimates for the Site

Provide the estimated potential emission for the site BEFORE and AFTER utilizing the proposed restriction(s) and/or limitation(s).

Pollutant or CAS No.	Potential Emission BEFORE taking Limitations (TPY)	Potential Emission AFTER taking Limitations (TPY)

*** Provide all supporting calculation methods as an attachment at the end of this application.**

2.2 Facility Type

Is this facility a Synthetic Minor Facility? Yes ☐ No ☒

If yes, go to Section 2.3, "Synthetic Minor Facility".

If no, go to Section 3, "Site Inventory".

IMPORTANT: Note that all Synthetic Minor Facilities must be able to meet the proposed restriction(s) and/or limitation(s) immediately upon the submission of this application. By signing the Certification of Compliance in Section 13 of this application, the facility for which a Synthetic Minor Status is proposed will be deemed a Synthetic Minor Facility according to the restriction(s) and/or limitation(s) proposed upon receipt of the application by the Department, unless the Department determines that the facility is unable to meet the Synthetic Minor requirements at a later date.

Please read instructions carefully before completing this application.

2.4 Compliance Method for the Site (for Synthetic Minor Facilities only)

Complete this section only if limitation(s) and/or restriction(s) were proposed in Section 2.3.

a. Explain how you would demonstrate compliance with the restriction(s) and/or limitation(s) listed in Section 2.3:

b. Describe what is to be reported in the compliance report:

c. Reporting start date:

d. Indicate the frequency for submitting compliance report as explained above:

Please read instructions carefully before completing this application.

2.3 Synthetic Minor Facility Information (to be completed by all facilities seeking Synthetic Minor Status)

Synthetic Minor Status for this facility can be taken at the: Source Level ☐ AND/OR Site Level ☐

If limitation(s) and/or restriction(s) can be taken at the site level (for all sources within this facility), complete the following questions, otherwise please go on to Section 3, "Site Inventory".

Synthetic Minor Status for the Entire Site is achievable through the following restrictions: (Please check all that apply and describe in detail what is/are proposed):

☐	Hours of Operation	
☐	Production/Throughput Rate	
☐	Type of Fuel	
☐	Fuel Usage	
☐	Control Devices	
☐	Emissions Limitations	
☐	Other	

Describe how the elected restriction(s) will allow the facility to become a Synthetic Minor?

Note: If Section 2.3 is completed and there are no additional restrictions proposed at the source level, the applicant can omit Sub Sections 5, 6, and 7 in Sections 5, 6, and 7 for all sources in this permit application.

Please read instructions carefully before completing this application.

Section 3 - Site Inventory

List all air pollution sources, control equipment, emission points and fuel material locations at this site. Duplicate this page as necessary. For renewals, only list sources not included in current permit.

Unit ID No.	Company Designation	Unit Type
101	*Pump Station Seal Leaks*	*Process*
103	*Maintenance (Pigging) Operation*	*Process*
C101	*Enclosed Flare*	*Control Device*
S101	*Enclosed Stack Flare*	*Point of Air Emission*
Z101	*Fugitive Emissions*	*Point of Air Emission*

Please read instructions carefully before completing this application.

Section 4 - Source Group (Optional)

4.1 Source Group Definition

This section applies to new State-Only Operating Permit applications only.

Define groups of source(s) that are subject to one or more applicable requirements that apply to all source(s) in the group.

Group No.	Source ID (for source(s) in this group)
GRP 01	101, 103

4.2 Applicable Requirements for Source Groups

For renewals, only list group level requirements not included in the current State-Only Operating Permit. If there are no changes, check the box to the right.

☒ No changes from current State-Only Operating Permit.

Describe and cite all applicable requirements pertaining to all source groups.

Note: A Method of Compliance Worksheet (Addendum 1) must be completed for each requirement listed.

Group Number	Citation Number	Citation Limitation	Limitation Used

Please read instructions carefully before completing this application.

Please read instructions carefully before completing this application.

Section 5 - Combustion Operational Inventory

(Complete this section for each combustion source in this site. Duplicate this section as needed).

For renewals, review and correct any pre-printed information and add additional sections for any new combustion unit listed in Section 3 of this application.

5.1 General Source Information

a. Unit ID: _____ b. Company Designation: _____

c. Plan Approval or Operating Permit Number: _____

d. Manufacturer: _____ e. Model Number: _____

f. Source Description: _____

g. Rated Heat Input/Throughput: _____ h. Installation Date: _____

i. Exhaust Temperature: _____ Units: _____ j. Exhaust % Moisture: _____ k. Exhaust Flow Volume: _____ SCFM

5.2 Exhaust System Components

Explain how the exhaust components are configured:

From Unit	Unit Description	To Unit	Unit Description	Percent Flow

Please read instructions carefully before completing this application.

5.3 Source Classification Code (SCC) Listing for Standard Operation			
Fuel/Material	**Associated SCC**	**Max Throughput Rate**	**Firing Sequence**

Please read instructions carefully before completing this application.

5.4 Maximum Fuel Physical Characteristics

If taking limitations on Fuel Physical Characteristics, see instructions.

SCC/Fuel Burned	FML*	% Sulfur	% Ash	BTU Content (Units)

*FML = Fuel Material Location

5.5 Limitations on Source Operation (optional)

Maximum amount of hours of source operation per year: _____

☐	Hours of Operation	
☐	Production Throughput Rate	
☐	Type of Fuel	
☐	Fuel Usage	
☐	Control Devices	
☐	Emissions Limitations	
☐	Other	

Describe how the elected restriction(s) will allow the facility to become a Synthetic Minor?

5.6 Compliance Method for this source (for Synthetic Minor Sources only)

Complete this section only if limitation(s) and/or restriction(s) were proposed in Section 5.5.

a. Explain how you would demonstrate compliance with the restriction(s) and/or limitation(s):

_____

_____

b. Describe what is to be reported in the compliance report:

_____

_____

c. Reporting start date: _____

d. Indicate the frequency for submitting compliance report as explained above: _____

Please read instructions carefully before completing this application.

5.7 Source Potential to Emit (for Synthetic Minor Sources only)

Give Potential Emission estimate for all air pollutants emitted at this source. Calculations for the Potential Emissions Estimate here should have included the restriction(s) and/or proposed in Section 5.5, if applicable.

Pollutant or CAS Number	Fuel/SCC	Emissions/Activity Allowable per Unit	Calc. Method	Max. Capacity	Total Hours	Emission in TPY

5.8 Source Applicable Requirements

Describe and cite all applicable requirements pertaining to this source.

Note: A Method of Compliance Worksheet (Addendum 1) must be completed for each requirement listed.

For renewals, only list group level requirements not included in the current State Only Operating Permit. If there are no changes, check the box to the right.

☒ No changes from current State Only Operating Permit.

Fuel/SCC	Citation Number	Citation Limitation	Limitation Used

Please read instructions carefully before completing this application.

Section 6 - Incinerator Operational Inventory

(Complete this section for each incinerator at this site. Duplicate this section as needed).

For renewals, review and correct any pre-printed information and add additional sections for any new incinerator listed in Section 3 of this application.

6.1 General Source Information

a. Unit ID: _____ b. Company Designation: _____

c. Plan Approval or Operating Permit Number: _____

d. Manufacturer: _____ e. Model Number: _____

f. Source Description: _____

g. Rated Heat Input/Throughput: _____ h. Installation Date: _____

i. Exhaust Temperature: _____ Units: _____ j. Exhaust % Moisture: _____ k. Exhaust Flow Volume: _____ SCFM

l. Inc. Capacity: _____ Lbs/Hr m. Primary Burner Heat Input: _____ Units _____

n. Exhaust % CO_2: _____ o. Secondary Burner Heat Input: _____ Units _____

p. Incinerator Class: _____

q. Waste Type: _____ r. Waste BTU/Lb: _____

6.2 Exhaust System Components

Explain how the exhaust components are configured:

From Unit	Unit Description	To Unit	Unit Description	Percent Flow

6.3 Source Classification Code (SCC) Listing for Standard Operation

Fuel/Material	Associated SCC	Max Throughput Rate	Firing Sequence

Please read instructions carefully before completing this application.

6.4 Maximum Fuel Physical Characteristics

If taking limitations on Fuel Physical Characteristics, see instructions.

SCC/Fuel Burned	FML*	% Sulfur	% Ash	BTU Content (Units)

*FML = Fuel Material Location

6.5 Limitations on Source Operation (optional) (for Synthetic Minor Sources only)

Maximum amount of hours of source operation per year: _____

☐	Hours of Operation	
☐	Production Throughput Rate	
☐	Type of Fuel	
☐	Fuel Usage	
☐	Control Devices	
☐	Emissions Limitations	
☐	Other	

Describe how the elected restriction(s) will allow the facility to become a Synthetic Minor?

Please read instructions carefully before completing this application.

6.6 Compliance Method for this source (for Synthetic Minor Sources only)

Complete this section only if limitation(s) and/or restriction(s) were proposed in Section 6.5.

a. Explain how you would demonstrate compliance with the restriction(s) and/or limitation(s):

_____

_____

_____

b. Describe what is to be reported in the compliance report:

_____

_____

_____

c. Reporting start date: _____

d. Indicate the frequency for submitting compliance report as explained above: _____

6.7 Source Potential to Emit (for Synthetic Minor Sources only)

Give Potential Emission estimate for all air pollutants emitted at this source. Calculations for the Potential Emissions Estimate here should have included the restriction(s) and/or limitation(s) proposed in Section 6.6, if applicable.

Pollutant or CAS Number	Fuel/SCC	Emission/Activity Allowable per Unit	Calc. Method	Max. Capacity	Total Hours	Emission in TPY

Please read instructions carefully before completing this application.

6.8 Source Applicable Requirements

Describe and cite all applicable requirements pertaining to this source.

Note: A Method of Compliance Worksheet (Addendum 1) must be completed for each requirement listed.

For renewals, only list source level requirements not included in the current State Only Operating Permit. If there are no changes, check the box to the right.

☒ No changes from current State Only Operating Permit.

Fuel/SCC	Citation Number	Citation Limitation	Limitation Used

Please read instructions carefully before completing this application.

Section 7 – Process Operational Inventory

(Complete this section for each process at this site. Duplicate this section as needed).

For renewals, review and correct any pre-printed information and add additional sections for any new incinerator listed in Section 3 of this application.

7.1 General Source Information

a. Unit ID: 101 b. Company Designation: PUMP STATION SEAL LEAKS

c. Plan Approval or Operating Permit Number:

d. Manufacturer: e. Model Number:

f. Source Description: Process

g. Rated Heat Input/Throughput: h. Installation Date:

i. Exhaust Temperature: Units: j. Exhaust % Moisture: k. Exhaust Flow Volume: SCFM

7.2 Exhaust System Components

Explain how the exhaust components are configured:

From Unit	Unit Description	To Unit	Unit Description	Percent Flow
101	Process	C101	Control Device	98
101	Process	Z101	Point of Air Emission	2
C101	Control Device	S101	Point of Air Emission	100

7.3 Source Classification code (SCC) Listing for Standard Operation

Fuel/Material	Associated SCC	Max. Throughput Rate	Firing Sequence

Please read instructions carefully before completing this application.

7.4 Maximum Fuel Physical Characteristics

If taking limitations on Fuel Physical Characteristics, see instructions.

SCC/Fuel Burned	FML*	% Sulfur	% Ash	BTU Content (Units)

*FML = Fuel Material Location

7.5 Limitations on Source Operation (optional) (for Synthetic Minor Sources only)

Maximum amount of hours of source operation per year: _____

☐	Hours of Operation	
☐	Production Throughput Rate	
☐	Type of Fuel	
☐	Fuel Usage	
☐	Control Devices	
☐	Emissions Limitations	
☐	Other	

Describe how the elected restriction(s) will allow the facility to become a Synthetic Minor?

Please read instructions carefully before completing this application.

7.6 Compliance Method for this source (for Synthetic Minor Sources only)

Complete this section only if limitation(s) and/or restriction(s) were proposed in Section 7.6.

a. Explain how you would demonstrate compliance with the restriction(s) and/or limitation(s):

_____

_____

b. Describe what is to be reported in the compliance report:

_____

_____

c. Reporting start date: _____

d. Indicate the frequency for submitting compliance report as explained above: _____

7.7 Source Potential to Emit (for Synthetic Minor Sources only)

Give Potential Emission estimate for all air pollutants emitted at this source. Calculations for the Potential Emissions Estimate here should have included the restriction(s) and/or limitation(s) proposed in Section 7.5, if applicable.

Pollutant or CAS Number	Fuel/SCC	Emissions/Activity Allowable per Unit	Calc. Method	Max. Capacity	Total Hours	Emission in TPY

7.8 Source Applicable Requirements

Describe and cite all applicable requirements pertaining to this source.

Note: A Method of Compliance Worksheet (Addendum 1) must be completed for each requirement listed.

For renewals, only list group level requirements not included in the current State Only Operating Permit. If there are no changes, check the box to the right.

☒ No changes from current State Only Operating Permit.

Fuel/SCC	Citation Number	Citation Limitation	Limitation Used

Please read instructions carefully before completing this application.

Section 7 – Process Operational Inventory

(Complete this section for each process at this site. Duplicate this section as needed).

For renewals, review and correct any pre-printed information and add additional sections for any new incinerator listed in Section 3 of this application.

7.1 General Source Information

a. Unit ID: 103

b. Company Designation: MAINTENANCE (PIGGING) OPERATION

c. Plan Approval or Operating Permit Number:

d. Manufacturer:

e. Model Number:

f. Source Description: Process

g. Rated Heat Input/Throughput:

h. Installation Date:

i. Exhaust Temperature: Units:

j. Exhaust % Moisture:

k. Exhaust Flow Volume: SCFM

7.2 Exhaust System Components

Explain how the exhaust components are configured:

From Unit	Unit Description	To Unit	Unit Description	Percent Flow
103	Process	C101	Control Device	100
C101	Control Device	S101	Point of Air Emission	100

7.3 Source Classification code (SCC) Listing for Standard Operation

Fuel/Material	Associated SCC	Max. Throughput Rate	Firing Sequence

Please read instructions carefully before completing this application.

7.4 Maximum Fuel Physical Characteristics

If taking limitations on Fuel Physical Characteristics, see instructions.

SCC/Fuel Burned	FML*	% Sulfur	% Ash	BTU Content (Units)

*FML = Fuel Material Location

7.5 Limitations on Source Operation (optional) (for Synthetic Minor Sources only)

Maximum amount of hours of source operation per year: _____

☐	Hours of Operation	
☐	Production Throughput Rate	
☐	Type of Fuel	
☐	Fuel Usage	
☐	Control Devices	
☐	Emissions Limitations	
☐	Other	

Describe how the elected restriction(s) will allow the facility to become a Synthetic Minor?

Please read instructions carefully before completing this application.

7.6 Compliance Method for this source (for Synthetic Minor Sources only)

Complete this section only if limitation(s) and/or restriction(s) were proposed in Section 7.6.

a. Explain how you would demonstrate compliance with the restriction(s) and/or limitation(s):

_____

_____

b. Describe what is to be reported in the compliance report:

_____

_____

c. Reporting start date: _____

d. Indicate the frequency for submitting compliance report as explained above: _____

7.7 Source Potential to Emit (for Synthetic Minor Sources only)

Give Potential Emission estimate for all air pollutants emitted at this source. Calculations for the Potential Emissions Estimate here should have included the restriction(s) and/or limitation(s) proposed in Section 7.5, if applicable.

Pollutant or CAS Number	Fuel/SCC	Emissions/Activity Allowable per Unit	Calc. Method	Max. Capacity	Total Hours	Emission in TPY

7.8 Source Applicable Requirements

Describe and cite all applicable requirements pertaining to this source.

Note: A Method of Compliance Worksheet (Addendum 1) must be completed for each requirement listed.

For renewals, only list group level requirements not included in the current State Only Operating Permit. If there are no changes, check the box to the right.

☒ No changes from current State Only Operating Permit.

Fuel/SCC	Citation Number	Citation Limitation	Limitation Used

Please read instructions carefully before completing this application.

Section 7 – Process Operational Inventory

(Complete this section for each process at this site. Duplicate this section as needed).

For renewals, review and correct any pre-printed information and add additional sections for any new incinerator listed in Section 3 of this application.

7.1 General Source Information

a. Unit ID: _____ b. Company Designation: _____

c. Plan Approval or Operating Permit Number: _____

d. Manufacturer: _____ e. Model Number: _____

f. Source Description: _____

g. Rated Heat Input/Throughput: _____ h. Installation Date: _____

i. Exhaust Temperature: _____ Units: _____ j. Exhaust % Moisture: _____ k. Exhaust Flow Volume: _____ SCFM

7.2 Exhaust System Components

Explain how the exhaust components are configured:

From Unit	Unit Description	To Unit	Unit Description	Percent Flow

7.3 Source Classification code (SCC) Listing for Standard Operation

Fuel/Material	Associated SCC	Max. Throughput Rate	Firing Sequence

Please read instructions carefully before completing this application.

7.4 Maximum Fuel Physical Characteristics

If taking limitations on Fuel Physical Characteristics, see instructions.

SCC/Fuel Burned	FML*	% Sulfur	% Ash	BTU Content (Units)

*FML = Fuel Material Location

7.5 Limitations on Source Operation (optional) (for Synthetic Minor Sources only)

Maximum amount of hours of source operation per year: _____

☐	Hours of Operation	
☐	Production Throughput Rate	
☐	Type of Fuel	
☐	Fuel Usage	
☐	Control Devices	
☐	Emissions Limitations	
☐	Other	

Describe how the elected restriction(s) will allow the facility to become a Synthetic Minor?

Please read instructions carefully before completing this application.

7.6 Compliance Method for this source (for Synthetic Minor Sources only)

Complete this section only if limitation(s) and/or restriction(s) were proposed in Section 7.6.

a. Explain how you would demonstrate compliance with the restriction(s) and/or limitation(s):

_____

_____

b. Describe what is to be reported in the compliance report:

_____

_____

c. Reporting start date: _____

d. Indicate the frequency for submitting compliance report as explained above: _____

7.7 Source Potential to Emit (for Synthetic Minor Sources only)

Give Potential Emission estimate for all air pollutants emitted at this source. Calculations for the Potential Emissions Estimate here should have included the restriction(s) and/or limitation(s) proposed in Section 7.5, if applicable.

Pollutant or CAS Number	Fuel/SCC	Emissions/Activity Allowable per Unit	Calc. Method	Max. Capacity	Total Hours	Emission in TPY

7.8 Source Applicable Requirements

Describe and cite all applicable requirements pertaining to this source.

Note: A Method of Compliance Worksheet (Addendum 1) must be completed for each requirement listed.

For renewals, only list group level requirements not included in the current State Only Operating Permit. If there are no changes, check the box to the right.

☒ No changes from current State Only Operating Permit.

Fuel/SCC	Citation Number	Citation Limitation	Limitation Used

Please read instructions carefully before completing this application.

Section 8 – Control Device Information (duplicate this section as needed)

For renewals, review and correct any pre-printed information and add additional sections for any new control device listed in Section 3 of this application.

8.1 General Control Device Information

a. Unit ID: C101

b. Company Designation: ENCLOSED FLARE

c. Used by Sources: 101, 103

d. Type:

e. Pressure Drop in H_2O:

f. Capture Efficiency:

g. Scrubber Flow Rate (GPM):

h. Manufacturer:

i. Model Number:

j. Installation Date:

8.2 Control Device Efficiencies for this Control Device

Pollutant Name	CAS Number	Estimate Control Efficiency	Basis for Efficiency Estimate

Please read instructions carefully before completing this application.

Section 8 – Control Device Information (duplicate this section as needed)

For renewals, review and correct any pre-printed information and add additional sections for any new control device listed in Section 3 of this application.

8.1 General Control Device Information

a. Unit ID: _____ b. Company Designation: _____

c. Used by Sources: _____

d. Type: _____

e. Pressure Drop in H_2O: _____ f. Capture Efficiency: _____

g. Scrubber Flow Rate (GPM): _____

h. Manufacturer: _____ i. Model Number: _____

j. Installation Date: _____

8.2 Control Device Efficiencies for this Control Device

Pollutant Name	CAS Number	Estimate Control Efficiency	Basis for Efficiency Estimate

Please read instructions carefully before completing this application.

Section 9 – Stack/Flue Information (duplicate this section as needed)

For renewals, review and correct any pre-printed information and add additional sections for any new stack/flue listed in Section 3 of this application.

9.1 General Stack/Vent Information

a. Unit ID: S101 b. Company Designation: ENCLOSED STACK FLARE

c. Discharge Type: VERTICAL: WEATHER CAP/SIMILAR OBSTRUCTIN

d. Diameter (ft): 4 Height (ft): 30 Base Elevation (ft): 4

e. Exhaust Temperature: 1660 deg F Exhaust % Moisture: 6 Exhaust Velocity: 8.34

f. Exhaust Volume: 20,630 ACFM Exhaust Volume: 4,848 SCFM

g. Distance to Nearest Property Line (ft):

h. Weather Cap?: ☐ Yes ☐ No

i. Used by Sources: C101

j. Latitude: 40° 14 30 Longitude: -77° 17 18

k. Horizontal Reference Datum:

l. Horizontal Collection Method:

m. Reference Point:

---

a. Unit ID: Z101 b. Company Designation: FUGITIVE EMISSIONS

c. Discharge Type:

d. Diameter (ft): Height (ft): Base Elevation (ft):

e. Exhaust Temperature: 75 deg F Exhaust % Moisture: 10 Exhaust Velocity:

f. Exhaust Volume: 2 ACFM Exhaust Volume: 2 SCFM

g. Distance to Nearest Property Line (ft):

h. Weather Cap?: ☐ Yes ☐ No

i. Used by Sources: 101

j. Latitude: 40° 14 30 Longitude: -77° 17 18

k. Horizontal Reference Datum:

l. Horizontal Collection Method:

m. Reference Point:

Please read instructions carefully before completing this application.

Section 9 – Stack/Flue Information (duplicate this section as needed)

For renewals, review and correct any pre-printed information and add additional sections for any new stack/flue listed in Section 3 of this application.

9.1 General Stack/Vent Information

a. Unit ID: _____ b. Company Designation: _____

c. Discharge Type: _____

d. Diameter (ft): _____ Height (ft): _____ Base Elevation (ft): _____

e. Exhaust Temperature: _____ Exhaust % Moisture: _____ Exhaust Velocity: _____

f. Exhaust Volume: _____ ACFM Exhaust Volume: _____ SCFM

g. Distance to Nearest Property Line (ft): _____

h. Weather Cap?: ☐ Yes ☐ No

i. Used by Sources: _____

j. Latitude: _____ Longitude: _____

k. Horizontal Reference Datum: _____

l. Horizontal Collection Method: _____

m. Reference Point: _____

---

a. Unit ID: _____ b. Company Designation: _____

c. Discharge Type: _____

d. Diameter (ft): _____ Height (ft): _____ Base Elevation (ft): _____

e. Exhaust Temperature: _____ Exhaust % Moisture: _____ Exhaust Velocity: _____

f. Exhaust Volume: _____ ACFM Exhaust Volume: _____ SCFM

g. Distance to Nearest Property Line (ft): _____

h. Weather Cap?: ☐ Yes ☐ No

i. Used by Sources: _____

j. Latitude: _____ Longitude: _____

k. Horizontal Reference Datum: _____

l. Horizontal Collection Method: _____

m. Reference Point: _____

Please read instructions carefully before completing this application.

Please read instructions carefully before completing this application.

Section 10 – Fuel Material Location (FML) Information (Optional)

For renewals, review and correct any pre-printed information and add additional sections for any new FML listed in Section 3 of this application.

10.1 Fuel Material Location Information

a. FML ID Number: _____ b. Name: _____

c. Capacity: _____ Units: _____ d. Fuel: _____

e. Maximum Fuel Characteristics: If fuel is coal, what is the moisture content? _____

% Ash: _____ % Sulfur: _____ BTU Content: _____ Units: _____

f. Used by Source:

_____

a. FML ID Number: _____ b. Name: _____

c. Capacity: _____ Units: _____ d. Fuel: _____

e. Maximum Fuel Characteristics: If fuel is coal, what is the moisture content? _____

% Ash: _____ % Sulfur: _____ BTU Content: _____ Units: _____

f. Used by Source:

_____

a. FML ID Number: _____ b. Name: _____

c. Capacity: _____ Units: _____ d. Fuel: _____

e. Maximum Fuel Characteristics: If fuel is coal, what is the moisture content? _____

% Ash: _____ % Sulfur: _____ BTU Content: _____ Units: _____

f. Used by Source:

Please read instructions carefully before completing this application.

Please read instructions carefully before completing this application.

Section 11 – Alternative Operating Scenario (optional)

(Duplicate this section for each source participated in this alternative scenarios)

11.1 General Information

a. Alternative Operating Scenario Name or ID No.: _____

b. Source ID No.: _____ c. Source Name: _____

d. Source Type (check one): ☐ Combustion ☐ Incinerator ☐ Process

e. Give a brief description of this alternative scenario stating how it is different from the standard operation:

11.2 Operational Flexibility Request

Check all that apply.

☐ Alternative exhaust system component configuration.
If this box is checked, complete Sections, 11.3 and 11.7

☐ Alternative type of fuel replacing or in addition to an existing fuel in standard operation.
If this box is checked, complete Sections 11.4 and/or 11.5 and 11.7

☐ Alternative process method replacing or in addition to a process SCC existing in standard operation.
If this box is checked, complete Section 11.6 and 11.7

☐ Alternative lower limitations.

11.3 Exhaust System Components

Specify the complete exhaust system component configuration for this alternative operating scenario.

From Component Type	From Component Number	To Component Type	To Component Number	Percent Flow	Begin Date	End Date

Please read instructions carefully before completing this application.

11.4 Source Classification Code (SCC) Listing for Alternative Operation			
Give a complete listing of all fuels burned, products produced by a process or waste incinerated for this alternative operating scenario.			
Fuel	**Associated SCC**	**Max. Throughput Rate**	**Firing Sequence**

11.5 Alternative Fuel Physical Characteristics				
Give a complete listing of all fuels physical characteristics for this alternative operating scenario.				
SCC/Fuel Burned	**FML**	**% Sulfur**	**% Ash**	**BTU Content (Units)**

11.6 Alternative Process/Product Description			
a. Briefly describe the change(s) in raw materials and/or process methods used in this operating scenario, if applicable:			
b. Provide and briefly describe the process SCC associated with this alternative operating scenario:			
Process SCC:		SCC Description:	
c. Alternative Product(s):			

Please read instructions carefully before completing this application.

11.7 Source Potential to Emit

Give Potential Emission estimate for all air pollutants emitted at this source for this operating scenario.

Pollutant or CAS Number	Fuel	Emissions/Activity Allowable per Unit	Calc. Method	Max. Capacity	Total Hours	Emission in TPY

Please read instructions carefully before completing this application.

Section 12 – Compliance Plan for the Facility

		Yes	No
12.1	Will your facility be in compliance with all applicable requirements at the time of permit issuance and continue to comply with these requirements during the permit duration?	☒	☐
12.2	Will your facility be in compliance with all applicable requirements presently scheduled to take effect during the term of the permit?	☒	☐
12.3	Will these requirements be met by the regulatory required dates?	☒	☐

If you checked "NO" in part 12.1, 12.2 or 12.3, answer the following questions:

12.4 Identify applicable requirement(s) for which compliance is not or will not be achieved:

Source ID Number	Citation Number

12.4.2 Briefly describe how compliance with this/these applicable requirement(s) will be achieved:

Please read instructions carefully before completing this application.

12.4.3. Provide a detailed schedule of compliance for the non-complying sources or activities identified in this section of the application. Include an enforceable sequence of corrective actions with milestone and projected compliance dates.

Date	Action/Milestone

12.4.4. Indicate the submittal frequency for the progress report(s): _____

12.4.5. Starting date for the submittal of the progress report(s):

Please read instructions carefully before completing this application.

Section 13 – Certification of Compliance for Synthetic Minor Source

In order for this Synthetic Minor facility to avoid the State Only Operating Permit requirements, the applicant must agree to be bound by the emissions limitation(s) and/or restriction(s) contained in this application. In addition, the applicant must agree that these emission limitation(s) are enforceable by the Department, the Environmental Protection Agency and the citizens.

13.1 Schedule for Compliance Certification Submission

a. Frequency of submittal: _____

b. Beginning Date: _____

13.2 Certification of Compliance (for Synthetic Minor Facility only)

I certify under the penalty of 18 Pa. CS 4904 (b) (2) that the sources covered by this application will comply with the emission limitations and other requirements contained in this application and all previously issued plan approvals and operating permits. I further certify that, based on information and belief formed after reasonable inquiry, the statements and information in this application are true, accurate, and complete.

(Signed) Mark A Martin Date 8/20/19

Name (Typed) Mark A. Martin

Title: Supervisor – Pipeline Operations

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY

AIR POLLUTION CONTROL ACT COMPLIANCE REVIEW FORM

Fully and accurately provide the following information, as specified. Attach additional sheets as necessary.

Type of Compliance Review Form Submittal (check all that apply)

☐ Original Filing — Date of Last Compliance Review Form Filing:
☒ Amended Filing — 08/20/18

Type of Submittal

☐ New Plan Approval ☐ New Operating Permit ☐ Renewal of Operating Permit
☐ Extension of Plan Approval ☐ Change of Ownership ☒ Periodic Submission (@ 6 mos)
☐ Other: _____

SECTION A. GENERAL APPLICATION INFORMATION

Name of Applicant/Permittee/("applicant")
(non-corporations-attach documentation of legal name)
Sunoco Pipeline, L.P.

Address 3807 West Chester Pike
Newtown Square, PA 19072

Telephone 610-670-3297 **Taxpayer ID#** 23-3102656

Permit, Plan Approval or Application ID#

Identify the form of management under which the applicant conducts its business (check appropriate box)

☐ Individual ☐ Syndicate ☐ Government Agency
☐ Municipality ☐ Municipal Authority ☐ Joint Venture
☐ Proprietorship ☐ Fictitious Name ☐ Association
☐ Public Corporation ☐ Partnership ☐ Other Type of Business, specify below:
☐ Private Corporation ☒ Limited Partnership

Describe below the type(s) of business activities performed.

SIC Code: 4613 - Refined Petroleum Pipeline
SIC Code 4612 - Crude Petroleum Pipeline
SIC Code 4619 - Natural Gas Liquid Pipeline

2700-PM-AQ0004 Rev. 6/2006

SECTION B. GENERAL INFORMATION REGARDING "APPLICANT"

If applicant is a corporation or a division or other unit of a corporation, provide the names, principal places of business, state of incorporation, and taxpayer ID numbers of all domestic and foreign parent corporations (including the ultimate parent corporation), and all domestic and foreign subsidiary corporations of the ultimate parent corporation with operations in Pennsylvania. Please include all corporate divisions or units, (whether incorporated or unincorporated) and privately held corporations. (A diagram of corporate relationships may be provided to illustrate corporate relationships.) Attach additional sheets as necessary.

Unit Name	Principal Places of Business	State of Incorporation	Taxpayer ID	Relationship to Applicant
Sunoco Pipeline L.P.	PA	TX	23-3102656	Applicant
Sunoco Logistics Partners Operations GP LLC	PA	DE	23-3102660	General Partner of Applicant
Sunoco Logistics Partners Operations L.P.	PA	DE	23-3102657	Limited Partner and owner of General Partner of Applicant
Sunoco Logistics Partners GP LLC	PA	DE	23-3102658	General Partner of Limited Partner of Applicant
Energy Transfer Partners, L.P.	TX	DE	73-1493906	Ultimate Parent - limited partner of the Limited Partner and owner of the General Partner of the limited partner of the Allicant
Subsidiaries of ultimate parent with operations in PA- See Attachment 3				

SECTION C. SPECIFIC INFORMATION REGARDING APPLICANT AND ITS "RELATED PARTIES"

Pennsylvania Facilities. List the name and location (mailing address, municipality, county), telephone number, and relationship to applicant (parent, subsidiary or general partner) of applicant and all Related Parties' places of business, and facilities in Pennsylvania. Attach additional sheets as necessary.

Unit Name	Street Address	County and Municipality	Telephone No.	Relationship to Applicant
see attachment #1				

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Provide the names and business addresses of all general partners of the applicant and parent and subsidiary corporations, if any.

Name	Business Address
Sunoco Pipeline, L.P.	3807 West Chester Pike, Newtown Square, PA 19072

List the names and business address of persons with overall management responsibility for the process being permitted (i.e. plant manager).

Name	Business Address
see attachment #2	

Plan Approvals or Operating Permits. List all plan approvals or operating permits issued by the Department or an approved local air pollution control agency under the APCA to the applicant or related parties that are currently in effect or have been in effect at any time 5 years prior to the date on which this form is notarized. This list shall include the plan approval and operating permit numbers, locations, issuance and expiration dates. Attach additional sheets as necessary.

Air Contamination Source	Plan Approval/ Operating Permit#	Location	Issuance Date	Expiration Date
see attachment #2				

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Compliance Background. (Note: Copies of specific documents, if applicable, must be made available to the Department upon its request.) List all documented conduct of violations or enforcement actions identified by the Department pursuant to the APCA, regulations, terms and conditions of an operating permit or plan approval or order by applicant or any related party, using the following format grouped by source and location in reverse chronological order. Attach additional sheets as necessary. See the definition of "documented conduct" for further clarification. Unless specifically directed by the Department, deviations which have been previously reported to the Department in writing, relating to monitoring and reporting, need not be reported.

Date	Location	Plan Approval/ Operating Permit#	Nature of Documented Conduct	Type of Department Action	Status: Litigation Existing/Continuing or Corrected/Date	Dollar Amount Penalty
						$
						$
						$
						$
						$
						$
						$
						$
						$
						$

List all incidents of deviations of the APCA, regulations, terms and conditions of an operating permit or plan approval or order by applicant or any related party, using the following format grouped by source and location in reverse chronological order. This list must include items both currently known and unknown to the Department. Attach additional sheets as necessary. See the definition of "deviations" for further clarification.

Date	Location	Plan Approval/ Operating Permit#	Nature of Deviation	Incident Status: Litigation Existing/Continuing Or Corrected/Date
none				

CONTINUING OBLIGATION. Applicant is under a continuing obligation to update this form using the Compliance Review Supplemental Form if any additional deviations occur between the date of submission and Department action on the application.

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VERIFICATION STATEMENT

Subject to the penalties of Title 18 Pa.C.S. Section 4904 and 35 P.S. Section 4009(b)(2), I verify under penalty of law that I am authorized to make this verification on behalf of the Applicant/Permittee. I further verify that the information contained in this Compliance Review Form is true and complete to the best of my belief formed after reasonable inquiry. I further verify that reasonable procedures are in place to ensure that "documented conduct" and "deviations" as defined in 25 Pa Code Section 121.1 are identified and included in the information set forth in this Compliance Review Form.

	2.27.19
Signature	Date
Todd Stamm	
Name (Print or Type)	
Vice President - Sunoco Pipeline L.P.	
Title	

Attachment #2: Plan Approvals & Operating Permits

Facility	Owner / Operator	State	Permit Type	Permit #	Effective	Expiration
Icedale	Sunoco Pipeline L.P.	PA	SOOP	15-00046	10/4/2018	10/3//2023
Montello SPL	Sunoco Pipeline L.P.	PA	Title V Permit	06-05050	1/27/2016	1/31/2021
Vanport Tank Farm	Sunoco Pipeline L.P.	PA	GPA/GP	GP2-04-00489	3/27/2014	3/27/2019
Beckerville Pump Station	Sunoco Pipeline L.P.	PA	SOOP	06-03164	12/1/2017	11/30/2022
Blainesport Pump Station	Sunoco Pipeline L.P.	PA	SOOP	36-03197	12/1/2017	11/30/2022
Blairsville Pump Station	Sunoco Pipeline L.P.	PA	SOOP	32-00433	5/14/2015	5/14/2020
Boot Pump Station	Sunoco Pipeline L.P.	PA	SOOP	15-00153	3/3/2017	3/2/2022
Cornwall pump Station	Sunoco Pipeline L.P.	PA	SOOP	38-03062	11/15/2017	9/30/2022
Cramer Pump Station	Sunoco Pipeline L.P.	PA	SOOP	32-00434	4/27/2015	4/27/2020
Doylesburg Pump Station	Sunoco Pipeline L.P.	PA	SOOP	50-03006	12/1/2017	11/30/2022
Eagle Pump Station	Sunoco Pipeline L.P.	PA	SOOP	15-00152	3/3/2017	3/3/2022
Ebensburg Pump Station	Sunoco Pipeline L.P.	PA	SOOP	11-00531	6/10/2015	6/10/2020
Holidaysburg Pump Station	Sunoco Pipeline L.P.	PA	SOOP	07-03062	3/1/2015	2/29/2020
Marklesburg Pump Station	Sunoco Pipeline L.P.	PA	SOOP	31-03035	3/1/2015	2/29/2020
Middletown Pump Station	Sunoco Pipeline L.P.	PA	SOOP	22-03094	12/1/2017	11/30/2022
Mt. Union Pump Station	Sunoco Pipeline L.P.	PA	SOOP	31-03036	12/1/2017	11/30/2022
Plainfield Pump Station	Sunoco Pipeline L.P.	PA	SOOP	21-03108	3/1/2015	2/29/2020
Houston Tank Farm	Sunoco Pipeline L.P.	PA	SOOP	63-01007	application submitted 11/21/2016	
Houston Injection Site	Sunoco Pipeline L.P.	PA	SOOP	63-01008	application submitted 11/28/2016	

Attachment 3
APCA Compliance Review Form
Subsidiaries with Operations in Pennsylvania of
Ultimate Parent Energy Transfer Partners, L.P. of Applicant Sunoco Pipeline L.P.
February 19, 2019

Entity Name	Entity Main Address	Domestic Jurisdiction	Taxpayer ID	Relationship to Applicant
Sunoco Partners Marketing & Terminals L.P.	3807 West Chester Pike, Newtown Square, PA 19073	TX	23-3102655	Subsidiary of applicant's parent
Regency Marcellus Gas Gathering LLC	8111 Westchester Drive, Suite 600 Dallas, TX 75225	DE	27-2142725	Indirect subsidiary of ultimate parent
Regency NEPA GAS Gathering LLC	8111 Westchester Drive, Suite 600 Dallas, TX 75225	TX	38-3877838	Indirect subsidiary of ultimate parent
ETC Northeast Pipeline LLC	6051 Wallace Road Ext., Suite 300 Wexford, PA 15090	DE	26-2863396	Indirect subsidiary of ultimate parent
ETC Northeast Field Services LLC	6051 Wallace Road Ext., Suite 300 Wexford, PA 15090	DE	35-2497449	Indirect subsidiary of ultimate parent
ET Rover Pipeline LLC	8111 Westchester Drive, Suite 600 Dallas, TX 75225	DE	46-5655475	Indirect subsidiary of ultimate parent and Member Rover Pipeline LLC joint venture
Rover Pipeline LLC	8111 Westchester Drive, Suite 600 Dallas, TX 75225	DE	47-1958303	Joint Venture of ET Rover Pipeline LLC, and non-affiliated company, AE-MidCo Rover, LLC
PEI Power Corporation	1 P E I CTR Wilkes-Barre, PA 18711-0601	PA	23-2933578	Indirect subsidiary of ultimate parent

Sunoco Pipeline, LP
525 Fritztown Road
Sinking Spring, PA 19608

August 16, 2019

CERTIFIED MAIL

Cumberland County Commissioners
1 Courthouse Square
Carlisle, PA 17013

RE: Municipal Notification
Sunoco Pipeline, LP/Plainfield Pump Station
Lower Frankford Township, Cumberland County
State Only Operating Permit 21-03108

Dear Commissioners:

This letter is to inform you that Sunoco Pipeline, LP has submitted a State Only Operating Permit renewal application to the Pennsylvania Department of Environmental Protection's Air Quality Program for the Plainfield Pump Station.

Pennsylvania Code Title 25 (Environmental Protection – Air Resources) Section 127.413 requires municipal notification including a thirty (30) day comment period regarding the permit application, which begins upon receipt of this formal notification. During this comment period, DEP will accept such comments. Comments are to be sent to:

Mr. William Weaver
Air Quality Program Manager
PA DEP – South-central Regional Office
909 Elmerton Avenue
Harrisburg, PA 17110-8200

Should you have any questions pertaining to this matter, please call me at 610-670-3297.

Sincerely,

Jed A. Werner
Air Permitting Manager

Enclosure

Cc: William Weaver, PADEP
M. Martin

Sunoco Pipeline, LP
525 Fritztown Road
Sinking Spring, PA 19608

August 16, 2019

CERTIFIED MAIL

Lower Frankford Township Supervisors
1205 Easy Road
Carlisle, PA 17015

RE: Municipal Notification
Sunoco Pipeline, LP/Plainfield Pump Station
Lower Frankford Township, Cumberland County
State Only Operating Permit 21-03108

Dear Supervisors:

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Sincerely,

Jed A. Werner
Air Permitting Manager

Enclosure

Cc: William Weaver, PADEP
M. Martin

SUNOCO PIPELINE L.P. - PIPELINE
8111 Westchester Dr., Ste 600
Dallas, TX 75225

Payment Date: **08/22/2019**

Check No.: **253000476**
Check Date: **08/22/2019**

Vendor: COMMONWEALTH OF PENNSYLVANIA
Vendor ID: 1000003823

Invoice Number	Invoice Date	Document Number	Reference	Gross Amount	Discount	Net Amount
ST_2397	08/14/2019	5800002222	HOLIDAYSBURG AIR FEE	750.00	0.00	750.00
ST_2401	08/14/2019	5800002223	PLAINFIELD PS ANN AIR FEE	750.00	0.00	750.00
ST_2402	08/14/2019	5800002224	MARKELSBURG PS AIR FEE	750.00	0.00	750.00
			Check Total.....			**$ 2,250.00**

PLEASE DETACH BEFORE DEPOSITING CHECK. For inquiries call:214-840-5422 or email accountspayable@energytransfer.com

THIS CHECK IS VOID WITHOUT A BLUE & GREEN BACKGROUND - THIS IS WATERMARKED PAPER - HOLD TO LIGHT TO VERIFY WATERMARK

SUNOCO PIPELINE L.P. - PIPELINE
8111 Westchester Dr., Ste 600
Dallas, TX 75225

Payable Through
WELLS FARGO BANK, N.A.
56-382
412

Vendor ID: 1000003823

Check No.:
253000476

Check Date:
08/22/2019

VOID AFTER 90 DAYS

PAY:
*** TWO THOUSAND TWO HUNDRED FIFTY USD and ZERO Cents ***-------- $2,250.00

To The
Order of:

COMMONWEALTH OF PENNSYLVANIA
CLEAN AIR FUND
909 ELMERTON AVE
HARRISBURG, PA 17110-8200

Authorized Signature

SIGNATURE HAS A COLORED BACKGROUND • BORDER CONTAINS MICROPRINTING

[redacted]