

COMMONWEALTH OF PENNSYLVANIA  
Department of Environmental Protection  
September 16, 2019  
484-250-5920

**SUBJECT:** TVOP Minor Operating Permit Modification & Administrative Amendment  
Sunoco Partners Marketing & Terminal, LP  
Marcus Hook Borough, Delaware County  
Application No. 23-00119  
APS: 823642, Auth: 1284511 (Modification)  
APS: 823642, AUTH: 1285703 (Amendment)

**To:** James D. Rebarchak *JDR*  
Regional Manager  
Air Quality *10/1/19*

**From:** George A Eckert *GAE*  
Permit Reviewer  
Air Quality

**Through:** Janine Tulloch-Reid, PE *JTR* *9/26/2019*  
Chief, Facilities Permitting Section  
Air Quality

**Through:** James Beach, PE *JAB*  
Chief, New Source Review Section *9/27/2019*  
Air Quality

Sunoco Partners Marketing & Terminal, LP (SPMT), located at 100 Green Street, Marcus Hook, PA 19061 (Marcus Hook Borough), Delaware County) has submitted the following two (2) applications:

1. a Minor Operating Permit Modification to reduce the aggregate Potential to Emit (PTE) limitation of carbon Monoxide (CO) emissions from the three Auxiliary boilers (Source numbers 031, 033, and 034) in the Title V Operating Permit; and
2. an Administrative Amendment to incorporate Plan Approval Number 23-0119H into the Title V Operating Permit.

**Administrative/Notifications (Minor Mod)**

Application Received:	July 29, 2019
GIF:	N/A
Compliance History:	Submitted every 6 months (last received April 17, 2019)
Site Location:	100 Green Street, Marcus Hook, PA 19061
Coordination involvement:	None Required
Application Fee:	\$750
Municipal notifications:	Submitted with the application
Administratively Complete:	Yes, but no letter sent out.

**Minor Modification**

The current aggregated long-term CO emission limit, found in Condition #001(c), for the three (3) boilers was 107.61 tons in any 12 consecutive month period. The new aggregated long-term CO emission limit, proposed in the minor operating permit modification, is 27.23 tons in any 12 consecutive month period.

The short-term CO emission limit and all other emission limits for the boilers are not being changed by this minor operating permit modification.

### Public Participation

Public notices received with the application, and delivery confirmations were received as follows:

- Delaware County Council, mailed on July 29, 2019, with a delivery confirmation dated August 1, 2019;
- Borough of Marcus Hook, mailed on July 29, 2019, with a delivery confirmation dated August 1, 2019;
- US EPA Region III, mailed on July 29, 2019, with a delivery confirmation dated August 5, 2019;
- Delaware Department of Natural Resources and Environmental Control, mailed on July 29, 2019, with a delivery confirmation dated August 1, 2019;
- Maryland Department of the Environment, mailed on July 29, 2019, with a delivery confirmation on August 2, 2019;
- New Jersey Department of Environmental Protection, July 29, 2019, with a delivery confirmation dated August 2, 2019;
- Newspaper publication in the Delaware County Daily Times, August 14, 2019.

The last public notice date was the newspaper notice published on August 14, 2019. In accordance with 25 Pa. code 127.462(d), the 21-day comment period on this request began on August 14<sup>th</sup> and ended on September 3, 2019. No comments were received during this 21-day comment period.

### Administrative/Notifications (Admin. Amend.)

Application Received: August 26, 2019 via email  
Application Fee: \$750.00  
Paper copy with the original check received on August 28, 2019

### Administrative Amendment (AA)

This AA is to incorporate Plan Approval Number 23-0119H into the TVOP. The affected source is the West Warm Flare (Source Number C03) and the associated NSPS Subpart VVa fugitive equipment leak standards (Source 103).

The Department performed an inspection on the West Warm Flare on February 28, 2019. This flare has been in operation for several months and the header to the old flare (EC Flare) had been disconnected.

There is no public comment period for this AA.

Public Participation – notices for this plan approval (23-0119H) were as follows:

- published in the Delaware County Daily Times on December 20, 21, and 22, 2017;
- published in the PA Bulletin on December 12, 2017; and
- sent to the US EPA on December 18, 2017.

There is no additional public review of comment period for this AA.

### Recommendation

I recommend issuance of a Minor Mod and AA to address the changes noted above.