

**TO** David S. Smith, E.I.T.  
Air Quality Engineering Specialist  
Facilities Permitting Section  
Air Quality Program  
Southeast Regional Office

**FROM** Daniel J. Roble DJR  
Air Quality Program Specialist  
Air Quality Modeling Section  
Division of Air Resource Management

**THROUGH** Andrew W. Fleck AWF  
Environmental Group Manager  
Air Quality Modeling Section  
Division of Air Resource Management

**DATE** March 4, 2022

**RE** Determination of Administrative Completeness  
Air Quality Analyses for Prevention of Significant Deterioration  
Sunoco Partners Marketing and Terminals, L.P.  
Plan Approval Application 23-0119K  
Proposed Ethane Chilling Expansion Project  
Marcus Hook Industrial Complex, Marcus Hook Borough, Delaware County

The Pennsylvania Department of Environmental Protection (DEP) received a plan approval application on February 16, 2022, from Sunoco Partners Marketing and Terminals, L.P. (SPMT) for a proposal to add process equipment to increase the ethane chilling capacity at its Marcus Hook Industrial Complex in Marcus Hook Borough, Delaware County.<sup>1</sup> The plan approval application was prepared by Environmental Resources Management (ERM), on behalf of SPMT. The purpose of this memorandum is to notify the DEP's Southeast Regional Office (SERO) that the air quality analyses portion of SPMT's plan approval application has been determined to be administratively complete.

The DEP is required under *25 Pa. Code* § 127.12d to “determine if an application for plan approval is administratively complete” and “provide written notice of the completeness determination to the applicant within 30 days of receipt of an application.” Furthermore, this section of the *Pa. Code* states, “an application is administratively complete if it contains the necessary information, maps, fees and other documents requested in the plan approval

---

<sup>1</sup> Letter with enclosures from Lisa M. Garcia, SPMT to David Smith, DEP SERO. February 14, 2022.

application, regardless of whether the information, maps and documents would be sufficient to justify issuance of the plan approval.”

SPMT’s proposed project would be a major modification to an existing major stationary source. SPMT’s plan approval application is therefore subject to the Prevention of Significant Deterioration (PSD) regulations codified in 40 CFR § 52.21. These federal PSD regulations are adopted and incorporated by reference in their entirety in 25 *Pa. Code* § 127.83 and the Commonwealth’s State Implementation Plan (SIP) codified in 40 CFR § 52.2020. According to 40 CFR § 52.21(b)(22), “[c]omplete means, in reference to an application for a permit, that the application contains all of the information necessary for processing the application.”

According to SPMT’s plan approval application, the project’s net emissions increase would equal or exceed the PSD significant emission rate (SER)<sup>2</sup> for carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), and particulate matter less than or equal to 2.5 micrometers in diameter (PM-2.5). In accordance with the PSD regulations, SPMT’s plan approval application includes the following air quality analyses:

- Relevant to 40 CFR § 52.21(k) through (n), air quality analyses of the net emissions increase of CO, NO<sub>x</sub>, and PM-2.5 due to SPMT’s project;
- Relevant to 40 CFR § 52.21(o), additional impact analyses of the impairment to visibility, soils, and vegetation due to SPMT’s project and associated growth; and
- Relevant to 40 CFR § 52.21(p), initial screening calculations to determine whether the net emissions increase due to SPMT’s project would have a negligible impact on air quality related values (AQRV) and visibility in nearby federal Class I areas.

This determination of administrative completeness for the air quality analyses portion of SPMT’s plan approval application does not prohibit the DEP from requiring SPMT to submit additional information, if determined to be necessary, during the subsequent technical review of the air quality analyses.

If you have any questions regarding this determination of administrative completeness, you may contact me by e-mail at [droble@pa.gov](mailto:droble@pa.gov) or by telephone at 717.705.7689. You may also contact Andrew Fleck, manager of the Air Quality Modeling Section, by e-mail at [afleck@pa.gov](mailto:afleck@pa.gov) or by telephone at 717.783.9243.

cc: Viren Trivedi, BAQ Permits  
Sean Wenrich, BAQ New Source Review  
James Rebarchak, SERO Air Quality  
Janine Tulloch-Reid, SERO Facilities Permitting  
Kirit Dalal, BAQ Air Resource Management  
AQ Modeling Correspondence File

---

<sup>2</sup> Code of Federal Regulations. 40 CFR § 52.21(b)(23). Definition of “significant.”