



December 9, 2022

**VIA ELECTRONIC MAIL**

Mr. James Rebarchak  
Southeast Regional Air Quality Program Manager  
Pennsylvania Department of Environmental Protection  
Southeast Regional Office  
2 East Main Street  
Norristown, PA 19401

**Re: Energy Transfer Marketing & Terminals, LP– Marcus Hook, Pennsylvania  
Marcus Hook Borough, Delaware County  
Notification of RACT III Applicability [25 Pa. Code §129.115(a)] and Alternative  
RACT Compliance Analysis [25 Pa. Code §129.114(i)]  
Title V Operating Permit No. 23-00119**

Dear Mr. Rebarchak:

Energy Transfer Marketing & Terminals, LP (Energy Transfer) is providing this summary of Reasonably Available Control Technology (RACT) compliance plans for the Marcus Hook Terminal located in Marcus Hook, Pennsylvania (Facility) in accordance with 25 Pa. Code §§129.111-129.115 (RACT III). This document is the notification of applicability and compliance proposal required under 25 Pa. Code §129.115(a). This document also includes the analyses required under 25 Pa. Code §129.114(i) for affected sources at the Facility subject to an alternative RACT determination.

**Facility Background and RACT III Rule Applicability**

Energy Transfer owns and operates a petroleum terminal located in Marcus Hook Borough, Pennsylvania. The Facility operates pursuant to the Pennsylvania Department of Environmental Protection (PADEP) Title V Operating Permit (TVOP) No. 23-00119.

On November 12, 2022, PADEP published 25 Pa. Code §§129.111-129.115, “Additional RACT Requirements for Major Sources of NO<sub>x</sub> and VOCs for the 2015 Ozone NAAQS” (RACT III). The RACT III requirements or emissions limitations supersede the requirements or emissions limitations of a RACT permit previously issued in accordance with 25 Pa. Code §§129.91-129.95 and 129.96-129.100, except in cases where an existing RACT permit specifies more stringent requirements and/or emissions limitations. Compliance with applicable RACT III requirements or emissions limitations must be demonstrated no later than January 1, 2023.

The RACT III Rule applies to major NO<sub>x</sub> and/or major VOC emitting facilities. 25 Pa. Code §121.1 defines major NO<sub>x</sub> and VOC emitting facilities as follows:

- Major NO<sub>x</sub> emitting facility – a facility-wide NO<sub>x</sub> potential to emit (PTE) greater than 100 tons per year (tpy).
- Major VOC emitting facility – a facility-wide VOC PTE greater than 50 tpy.

The facility-wide NO<sub>x</sub> PTE is greater than 100 tpy; therefore, Energy Transfer is a major NO<sub>x</sub>-emitting facility subject to the NO<sub>x</sub> provisions of RACT III under 25 Pa. Code §129.111(a). The facility-wide VOC PTE is greater than 50 tpy; therefore, Energy Transfer is also a major VOC-emitting facility subject to the VOC provisions of RACT III under 25 Pa. Code §129.111(a). This notification is being made in accordance with the requirements of the RACT III Rule for the Facility's NO<sub>x</sub> and VOC-emitting sources.

### **Notification of Applicability and Compliance Proposal [25 Pa. Code §129.115(a)]**

The following subsections provide the notification of applicability and compliance proposal required under 25 Pa. Code §129.115(a).

#### ***25 Pa. Code §129.115(a)(1) – Submission Deadline***

Because the Facility was a major NO<sub>x</sub> and VOC emitting facility prior to August 3, 2018, this submittal is being made on or before December 31, 2022 in accordance with 25 Pa. Code §129.115(a)(1)(i).

#### ***25 Pa. Code §129.115(a)(2) – Identification of Air Contamination Sources That Commenced Operation on or Before August 3, 2018***

Table A-1 and A-2 of Attachment A provide the RACT III rule applicability summary for NO<sub>x</sub> and VOC, respectively, and identify the following:

- Air contamination sources subject to a presumptive RACT requirement or RACT emissions limitation specified in 25 Pa. Code §129.112.
- Air contamination sources subject to an alternative RACT requirement or RACT emissions limitation under 25 Pa. Code §129.114.
- Air contamination sources that do not have the potential to emit NO<sub>x</sub> or VOC and are not required to be evaluated under the RACT III Rule.

Table A-3 of Attachment A provides the RACT III exemption summary, which identifies the following:

- Air contamination sources exempted from 25 Pa. Code §§129.112-114 because they emit less than 1 tpy of NO<sub>X</sub> and/or less than 1 tpy of VOC, in accordance with 25 Pa. Code §129.111(c).
- Air contamination sources exempted from 25 Pa. Code §§129.112-114 because they are already subject to certain Chapter 129 RACT requirements [i.e., §129.51, §129.52(a)-(k) and Table I categories 1-11, §§129.52a-129.52e, §§129.54-129.63a, §§129.64-129.69, §§129.71-129.75, §§129.77, and §§129.101-129.107], in accordance with 25 Pa. Code §129.111(a).

Source ID C03 (West Warm Flare) commenced operation after August 3, 2018 (associated with Source ID 103, installed under Plan Approval No. 23-0119H). Therefore, Source ID C03 does not meet the applicability criteria of 25 Pa. Code §129.111(a), is not subject to RACT III, and is not evaluated further herein.

***25 Pa. Code §129.115(a)(3) – Identification of Air Contamination Sources That Were Modified or Commenced Operation After August 3, 2018 and Triggered Major Source Thresholds***

Because the Facility was a major NO<sub>X</sub> and VOC emitting facility prior to August 3, 2018, 25 Pa. Code §129.111(b) does not apply.

***25 Pa. Code §129.115(a)(4) – Identification of Air Contamination Sources That Emit Less Than 1 tpy***

As described above, Table A-3 of Attachment A identifies the air contamination sources that emit less than 1 tpy of NO<sub>X</sub> and/or VOC as well as the basis for exemption for each.

***25 Pa. Code §129.115(a)(5) – Air Contamination Source Information (Commenced Operation on or Before August 3, 2018)***

Table A-4 of Attachment A provides a source inventory that includes a description, make, model, and location (as available) of each RACT III affected source at the Facility. The applicable RACT requirement or RACT emissions limitation for each source is provided in the RACT III Rule Applicability Summaries as Table A-1 and A-2 of Attachment A.

The following sources require alternative RACT determinations under 25 Pa. Code §129.114(i):

- Source ID 031 (Auxiliary Boiler 1)
- Source ID 033 (Auxiliary Boiler 3)
- Source ID 034 (Auxiliary Boiler 4)
- Source ID 115 (Marine Vessel Loading)
- Source ID 139 (Existing Cooling Towers 15-2B)
- Source ID 402 (Blind Changing)

- Source ID 801 (NSPS Subpart VV Fugitive Leaks)

Energy Transfer has determined that the alternative RACT requirements and/or RACT emissions limitations that were previously approved by PADEP under 25 Pa. Code §129.99(e) continue to represent RACT for these sources. An analysis is provided below to certify that the alternative RACT determinations approved by PADEP under 25 Pa. Code §129.99(e) remain valid. Energy Transfer proposes to comply with the RACT III Rule by continuing to comply with the applicable RACT conditions of the current TVOP No. 23-00119. Energy Transfer will meet the January 1, 2023 compliance deadline of the RACT III Rule through continued compliance with these conditions.

***25 Pa. Code §129.115(a)(6) – Air Contamination Source Information (Were Modified or Commenced Operation After August 3, 2018 and Triggered Major Source Thresholds)***

Because the Facility was a major NO<sub>x</sub> and VOC emitting facility prior to August 3, 2018, 25 Pa. Code §129.115(a)(6) does not apply.

***25 Pa. Code §129.115(a)(7) – Air Contamination Source Information (Sources That Emit Less Than 1 tpy)***

Table A-4 of Attachment A provides a Source Inventory that includes a description, make, model, and location (as available) of the air contamination sources that have a PTE of less than 1 tpy of NO<sub>x</sub> and VOC. The corresponding PTE calculation is shown in Table A-5 of Appendix B.

**Alternative RACT Compliance [25 Pa. Code §129.114(a)]**

Energy Transfer has developed alternative RACT analyses for the 9 sources at the Facility identified in Table 1.

**Table 1  
Summary of Sources that Require Alternative RACT  
Determinations and Do Not Meet 25 Pa. Code §129.114(i)**

Source ID	Source Name	Pollutant	RACT III Citation
102	Refrigerated Propane Tank (500K BBL)	VOC	25 Pa. Code §129.114(c)
103	NSPS Subpart VVa Fugitive Equipment Leaks	VOC	25 Pa. Code §129.114(c)
104	Marine Vessel Loading (Refrigerated)	VOC	25 Pa. Code §129.114(c)
105	Cavern	VOC	25 Pa. Code §129.114(c)
106A	Demethanizer	VOC	25 Pa. Code §129.114(c)
111	Natural Gasoline Loading Rack	VOC	25 Pa. Code §129.114(c)
112	New Cooling Towers	VOC	25 Pa. Code §129.114(c)
119	Refrigerated Propane Tank (900K BBL)	VOC	25 Pa. Code §129.114(c)
120	Refrigerated Propane Tank (589K BBL)	VOC	25 Pa. Code §129.114(c)

Source IDs 103, 119, and 120 were not evaluated under RACT II and are not subject to the RACT requirements of 25 Pa. Code §129.112. These sources were installed via Plan Approval during the RACT II evaluation period and underwent a Best Available Technology (BAT) analysis; therefore, Energy Transfer has proposed an alternative VOC RACT determination in accordance with 25 Pa. Code §129.114(d).

Source IDs 102, 104, 105, 106A, and 111 were not evaluated under RACT II and are not subject to the RACT requirements of 25 Pa. Code §129.112. During the RACT II evaluation period, the Facility underwent a reconfiguration so that it could operate as a petroleum terminal instead of the petroleum refinery. As a result of this reconfiguration, Source IDs 102, 104, 105, 106A, and 111 were added to TVOP No. 23-00119 after completion of the RACT II evaluation and associated submittals to PADEP. Therefore, Energy Transfer has proposed an alternative VOC RACT determination for each of Source IDs 102, 104, 105, 106A, and 111 in accordance with 25 Pa. Code §129.114(d).

Source ID 112 was not in existence on or before July 20, 2012 and was not subject to RACT II under 25 Pa. Code §129.96. Source ID 112 is subject to RACT III under 25 Pa. Code §129.111. However, there are no applicable requirements in 25 Pa. Code §129.112, therefore, Energy Transfer has proposed an alternative VOC RACT determination in accordance with 25 Pa. Code §129.114(d).

Energy Transfer is submitting a Significant Operating Permit Modification Application under separate cover that includes the alternative RACT determinations and supporting information for the sources identified in Table 1.

**Analysis of Alternative RACT Compliance [25 Pa. Code §129.114(i)]**

Energy Transfer has reviewed the alternative RACT analyses for those sources identified in Table 2 and has provided the information required in 25 Pa. Code §129.114(i) assuring compliance with the provisions in 25 Pa. Code §§129.114(a)-(c) and (e)-(h), except for sources subject to §§129.112(c)(11) or (i)-(k).

**Table 2  
Summary of Sources that Require Alternative RACT  
Determinations and Meet 25 Pa. Code §129.114(i)**

Source ID	Source Name	RACT III Citation
031	Auxiliary Boiler 1	25 Pa. Code §129.114(b)
033	Auxiliary Boiler 3	25 Pa. Code §129.114(b)
034	Auxiliary Boiler 4	25 Pa. Code §129.114(b)
115	Marine Vessel Loading	25 Pa. Code §129.114(c)
139	Existing Cooling Towers 15-2B	25 Pa. Code §129.114(c)
402	Blind Changing	25 Pa. Code §129.114(c)
801	NSPS Subpart VV Fugitive Leaks	25 Pa. Code §129.114(c)

For the Auxiliary Boilers (Source IDs 031, 033, and 034), alternative RACT determinations were previously proposed by Energy Transfer under 25 Pa. Code §129.99(b) and approved by PADEP under 25 Pa. Code §129.99(e). New alternative RACT analyses are required under RACT III because the applicable presumptive limits have changed.

There are no applicable unit-specific presumptive RACT VOC limits for Source IDs 115, 139, 402, and 801, and each individual source's VOC PTE is greater than 2.7 tpy. The following subsections provide the required analysis of alternative RACT compliance under 25 Pa. Code §129.114(i) for these sources.

***25 Pa. Code §129.114(i)(1)(i)(A) – Identification of New Air Cleaning Devices, Air Pollution Control Technologies, or Techniques***

Energy Transfer has reviewed entries in the RACT/Best Available Control Technology (BACT)/Lowest Achievable Emissions Rate (LAER) Clearinghouse (RBLC) to determine whether any new control technologies are available that can be applied to the sources identified in Table 2. No new available control technologies were identified for the sources in Table 2 beyond those identified in the alternative RACT analyses previously provided under 25 Pa Code §129.99(d).

***25 Pa. Code §129.114(i)(1)(i)(B) – List Previously-Identified Technically Feasible Controls***

Technically feasible air pollution control technologies previously identified under 25 Pa. Code §§129.92(b)(1)-(3) that were included in Energy Transfer's 25 Pa. Code §129.99(d) RACT II submittal are provided in Table 3.

**Table 3**  
**Technically Feasible Air Pollution Control Technologies Approved Under 25 Pa. Code**  
**§§129.99**

Source ID	Source Name	Pollutant	Control Technologies	Feasibility
031, 033, and 034	Auxiliary Boilers 1, 3, and 4	NO <sub>x</sub>	Ultra-low NO <sub>x</sub> Burners (ULNB)	Economically Infeasible - Cost per ton of NO <sub>x</sub> is \$52,331.
			Selective Non-Catalytic Reduction (SNCR)	Economically Infeasible - Cost per ton of NO <sub>x</sub> is \$12,126.
			Selective Catalytic Reduction (SCR)	Economically Infeasible - Cost per ton of NO <sub>x</sub> is \$25,106.
			ULNB and SCR	Economically Infeasible - Cost per ton of NO <sub>x</sub> is \$51,271.
115	Marine Vessel Loading	VOC	Thermal Incinerator	Technically Infeasible – the control efficiency is equal to or less than their current control efficiency of 98%.
			Adsorption	Technically Infeasible – the control efficiency is equal to or less than their current control efficiency of 98%.
			Condenser	Technically Infeasible – the control efficiency is equal to or less than their current control efficiency of 98%.
139	Existing Cooling Towers	VOC	There is no technically feasible add-on control option for the fugitive VOC emissions from the cooling towers. As required by the current TVOP 23-00119, Energy Transfer uses an equipment inspection and monitoring program to minimize and repair exchanger leaks and reduce VOC emissions from the cooling towers.	
402	Blind Changing	VOC	There is no technically feasible add-on control option for the fugitive VOC emissions. As required by the current TVOP 23-00119, this source must adhere to applicable 40 CFR Part 60, Subpart VVa and LDAR requirements.	
801	NSPS Subpart VV Fugitive Leaks	VOC	There is no technically feasible add-on control option for the fugitive VOC emissions. As required by the current TVOP 23-00119, this source must adhere to applicable 40 CFR Part 60, Subpart VV and LDAR requirements.	

**25 Pa. Code §129.114(i)(1)(i)(C) – Summary of Previous Economic Feasibility Analyses**

Energy Transfer did not determine any technically feasible control technologies for the sources listed in Table 3, except for Source IDs 031, 033 and 034. As part of Energy Transfer’s RACT II submittal, Energy Transfer performed analyses under 25 Pa. Code §129.99(d) to determine which, if any, of the technically feasible control technologies identified for Source IDs 031, 033, and 034 were economically feasible using the methods presented in the “EPA Air Pollution Control Cost Manual” (Sixth Edition, EPA/452/B-02-0001, January 2002), as amended. Summaries of the economic feasibility analyses submitted under 25 Pa. Code §129.99(d). The corresponding cost

effectiveness for each technically feasible air cleaning device, air pollution control technology or technique as submitted previously under is provided in Table 3.

***25 Pa. Code §129.114(i)(1)(i)(D) – Statement of Economic Infeasibility***

Based on the summaries of economic feasibility provided herein in accordance with 25 Pa. Code §129.114(i)(1)(i)(C), Energy Transfer has demonstrated that the cost effectiveness of the technically feasible control strategies provided under 25 Pa. Code §129.99(d), remain equal to or greater than \$7,500 per ton of NO<sub>x</sub> emissions for Source IDs 031, 033, and 034. When considering the increases to the cost of fuel and inflation as indicated by the Consumer Price Index (CPI), the overall control costs expressed in 2022 dollars are only expected to have increased, and the control technologies for which cost effectiveness was evaluated in Energy Transfer's 25 Pa. Code §129.99(d) RACT II submittal remain economically infeasible. Energy Transfer did not determine any technically feasible control technologies for Source IDs 115, 139, 402, and 801; therefore, an economic feasibility analysis was not conducted for these sources.

***25 Pa. Code §129.114(i)(1)(i)(E) – Additional Information***

Energy Transfer will provide additional information to support the alternative RACT Compliance Analysis included herein if requested by PADEP.

***Alternative RACT Compliance Summary***

Based on the 25 Pa. Code §129.114(i) analysis provided herein, Energy Transfer has determined that the alternative RACT requirements and/or RACT emissions limitations previously approved by PADEP under 25 Pa. Code §129.99(e) continue to be RACT for the sources summarized in Table 2. Sources subject to a new alternative RACT analysis under 25 Pa. Code §129.114(d) will submit a compliance demonstration summary under a separate cover. Energy Transfer proposes to comply with the RACT III Rule by continuing to comply with the applicable RACT conditions of TVOP No. 23-00119. Energy Transfer will meet the January 1, 2023 compliance deadline of the RACT III Rule through continued compliance with these conditions.

***Certification of Alternative RACT Compliance Analysis***

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this 25 Pa. Code §129.114(i) Alternative RACT Compliance Analysis are true, accurate, and complete. Furthermore, the Alternative RACT Compliance Analysis previously approved by PADEP under 25 Pa. Code §129.99(e) (relating to alternative RACT proposal and petition for alternative compliance schedule) assures compliance with the applicable provisions of 25 Pa. Code §129.114.

Edward Human  
Name of Responsible Official

Senior Director – Marcus Hook Operations  
Title of Responsible Official

  
Signature of Responsible Official

12/13/2022  
Date

**RACT III Rule Recordkeeping**

In accordance with 25 Pa. Code §129.115(f), Energy Transfer will keep sufficient records for demonstrating compliance with the RACT III Rule including continued compliance with the RACT-specific conditions of TVOP No. 23-00119. In accordance with 25 Pa. Code §129.115(k), all records will be maintained for at least five years, and will be made available to PADEP upon receipt of a written request.

In accordance with 25 Pa. Code §129.115(a), Energy Transfer is submitting this letter to PADEP no later than December 31, 2022. Please contact Kevin Smith at (610) 859-1279 or kevin.smith2@energytransfer.com if you have any additional questions.

Sincerely,  
**Energy Transfer Marketing & Terminals, LP**



Kevin Smith  
Senior Environmental Compliance Specialist

Attachment A: RACT III Rule Applicability Summary

cc: Meghan Barber (ALL4 LLC)

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**ATTACHMENT A –  
RACT III RULE APPLICABILITY SUMMARY**

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**Table A-1**  
**RACT III Rule Applicability Summary - NO<sub>x</sub> Emitting Sources**  
**Energy Transfer Marketing & Terminals, LP - Marcus Hook, PA**

Source ID	Source Name	Source Capacity/ Throughput	Fuel/Throughput Material	RACT III Applicability		
				Classification	Citation	NO <sub>x</sub> Limitation/Requirement
031	Auxiliary Boiler 1	392.5 MMBtu/hr	Process Gas and Natural Gas	Dual-fired combustion unit or process heater with a rated heat input greater than or equal to 50 MMBtu/hr	25 Pa. Code §129.114(i)	Case-by-case RACT determination.
033	Auxiliary Boiler 3	392.5 MMBtu/hr	Process Gas and Natural Gas	Dual-fired combustion unit or process heater with a rated heat input greater than or equal to 50 MMBtu/hr	25 Pa. Code §129.114(i)	Case-by-case RACT determination.
034	Auxiliary Boiler 4	392.5 MMBtu/hr	Process Gas and Natural Gas	Dual-fired combustion unit or process heater with a rated heat input greater than or equal to 50 MMBtu/hr	25 Pa. Code §129.114(i)	Case-by-case RACT determination.
101 <sup>(a)</sup>	Refrigerated Ethane Tank (300K BBL)	300K BBL	Ethane	N/A - Not a Source of NO <sub>x</sub>		
102 <sup>(a)</sup>	Refrigerated Propane Tank (500K BBL)	500K BBL	Propane	N/A - Not a Source of NO <sub>x</sub>		
103	NSPS Subpart VVa Fugitive Equipment Leaks	N/A	N/A	N/A - Not a Source of NO <sub>x</sub>		
104 <sup>(a)</sup>	Marine Vessel Loading (Refrigerated)	N/A	Ethane/Propane/Butane	N/A - Not a Source of NO <sub>x</sub>		
105 <sup>(a)</sup>	Cavern	N/A	N/A	N/A - Not a Source of NO <sub>x</sub>		
106A <sup>(a)</sup>	Demethanizer	N/A	Ethane/Propane/Methane	N/A - Not a Source of NO <sub>x</sub>		
111 <sup>(a)</sup>	Natural Gasoline Loading Rack	N/A	Pentane/Natural Gas/Naphtha	N/A - Not a Source of NO <sub>x</sub>		
112	New Cooling Towers	1.8 MGPH	Water	N/A - Not a Source of NO <sub>x</sub>		
113 <sup>(b)</sup>	(6) Diesel Engine Pumps	Various	#2 Oil	Emergency standby engine operating less than 500 hours in a 12-month rolling period	25 Pa. Code §129.112(c)(10)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
115	Marine Vessel Loading	N/A	Petroleum Products	N/A - Not a Source of NO <sub>x</sub>		
116	Marine Vessel Ballasting	N/A	Ballast Water	N/A - Not a Source of NO <sub>x</sub>		
117	Refrigerated Ethane Tank (300K BBL)	300K BBL	Ethane	N/A - Not a Source of NO <sub>x</sub>		
118	Refrigerated Butane Tank (575K BBL)	575K BBL	Butane	N/A - Not a Source of NO <sub>x</sub>		
119	Refrigerated Propane Tank (900K BBL)	900K BBL	Propane	N/A - Not a Source of NO <sub>x</sub>		
120	Refrigerated Propane Tank (589K BBL)	589K BBL	Propane	N/A - Not a Source of NO <sub>x</sub>		
121	Tank 139 Int Float 6.5 MBBL	6.5M BBL	Petroleum Liquids	N/A - Not a Source of NO <sub>x</sub>		
122	Tank 130 Ext Float 208.5 MBBL	208.5M BBL	Petroleum Liquids	N/A - Not a Source of NO <sub>x</sub>		
123	Tank 131 Ext Float 208.5 MBBL	208.5M BBL	Petroleum Liquids	N/A - Not a Source of NO <sub>x</sub>		
128	Tank 234 Int Float 70.1 MBBL	70.1M BBL	Petroleum Liquids	N/A - Not a Source of NO <sub>x</sub>		
130	Tank 132 Int Float 14.6 MBBL	14.6M BBL	Petroleum Liquids	N/A - Not a Source of NO <sub>x</sub>		
132	Tank 242 Int Float 69.2 MBBL	69.2M BBL	Petroleum Liquids	N/A - Not a Source of NO <sub>x</sub>		

**Table A-1**  
**RACT III Rule Applicability Summary - NO<sub>x</sub> Emitting Sources**  
**Energy Transfer Marketing & Terminals, LP - Marcus Hook, PA**

Source ID	Source Name	Source Capacity/ Throughput	Fuel/Throughput Material	RACT III Applicability		
				Classification	Citation	NO <sub>x</sub> Limitation/Requirement
133	Tank 246 Int Float 54.4 MBBL	52.4M BBL	Petroleum Liquids		N/A - Not a Source of NO <sub>x</sub>	
134	Tank 248 Int Float 52.4 MBBL	52.4M BBL	Petroleum Liquids		N/A - Not a Source of NO <sub>x</sub>	
136	Tank 250 Int Float 80.4 MBBL	80.4M BBL	Petroleum Liquids		N/A - Not a Source of NO <sub>x</sub>	
139	Existing Cooling Towers	475 GPH	Recycle Water		N/A - Not a Source of NO <sub>x</sub>	
146	Tank 344 Fixed Roof 190.3 MBBL	190.3M BBL	Petroleum Liquids		N/A - Not a Source of NO <sub>x</sub>	
148	Tank 352 Int Float 179.7 MBBL	179.7M BBL	Petroleum Liquids		N/A - Not a Source of NO <sub>x</sub>	
149	Tank 353 Int Float 189.7 MBBL	189.7M BBL	Petroleum Liquids		N/A - Not a Source of NO <sub>x</sub>	
150	Tank 354 Int Float 182.2 MBBL	182.2M BBL	Petroleum Liquids		N/A - Not a Source of NO <sub>x</sub>	
151	Tank 355 Int Float 189.7 MBBL	189.7M BBL	Petroleum Liquids		N/A - Not a Source of NO <sub>x</sub>	
177	Tank 524 Int Float 75.7 MBBL	75.7M BBL	Petroleum Liquids		N/A - Not a Source of NO <sub>x</sub>	
178	Tank 527 Int Float 69.7 MBBL	69.7M BBL	Petroleum Liquids		N/A - Not a Source of NO <sub>x</sub>	
179	Tank 528 Ext Float 149.2 MBBL	149.2M BBL	Petroleum Liquids		N/A - Not a Source of NO <sub>x</sub>	
180	Tank 529 Ext Float 149.2 MBBL	149.2M BBL	Petroleum Liquids		N/A - Not a Source of NO <sub>x</sub>	
182	Tank 594 Ext Float 81.3 MBBL	81.3M BBL	Petroleum Liquids		N/A - Not a Source of NO <sub>x</sub>	
188	Tank 607 Int Float 100 MBBL	100M BBL	Petroleum Liquids		N/A - Not a Source of NO <sub>x</sub>	
190	Tank 609 Int Float 98.17 MBBL	98.17M BBL	Petroleum Liquids		N/A - Not a Source of NO <sub>x</sub>	
192	Tank 611 Int Float 87.8 MBBL	87.8M BBL	Petroleum Liquids		N/A - Not a Source of NO <sub>x</sub>	
202	Tank 3 Int Float 41.0 MBBL	41.0M BBL	Petroleum Liquids		N/A - Not a Source of NO <sub>x</sub>	
204	Tank 253 Int Float 90.5 MBBL	90.5M BBL	Petroleum Liquids		N/A - Not a Source of NO <sub>x</sub>	
212	Tank 610 Int Float 96.0 MBBL	96.0M BBL	Petroleum Liquids		N/A - Not a Source of NO <sub>x</sub>	
225	Tank 638 Int Float 87.8 MBBL	87.8M BBL	Petroleum Liquids		N/A - Not a Source of NO <sub>x</sub>	
300	MISC Tanks	N/A	Petroleum Liquids		N/A - Not a Source of NO <sub>x</sub>	
302	Tank 2 Int Float 182.9 MBBL	182.9M BBL	Petroleum Liquids		N/A - Not a Source of NO <sub>x</sub>	
357	Tank 357 Int Float 182.9 MBBL	182.9M BBL	Petroleum Liquids		N/A - Not a Source of NO <sub>x</sub>	
358	Tank 358 Int Float 182.9 MBBL	182.9M BBL	Petroleum Liquids		N/A - Not a Source of NO <sub>x</sub>	
367	Vehicle Refueling - Diesel	N/A	Diesel Fuel		N/A - Not a Source of NO <sub>x</sub>	
368	Vehicle Refueling - Gasoline	N/A	Gasoline		N/A - Not a Source of NO <sub>x</sub>	
402	Blind Changing	N/A	Petroleum Liquids		N/A - Not a Source of NO <sub>x</sub>	

**Table A-1**  
**RACT III Rule Applicability Summary - NO<sub>x</sub> Emitting Sources**  
**Energy Transfer Marketing & Terminals, LP - Marcus Hook, PA**

Source ID	Source Name	Source Capacity/ Throughput	Fuel/Throughput Material	RACT III Applicability		
				Classification	Citation	NO <sub>x</sub> Limitation/Requirement
403 <sup>(b)</sup>	NESHAP ZZZZ Fire Pumps (2)	662 hp each	Diesel Fuel	Emergency standby engine operating less than 500 hours in a 12-month rolling period	25 Pa. Code §129.112(c)(10)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
404 <sup>(b)</sup>	NSPS IIII Emergency Generator	619 hp	Diesel Fuel	Emergency standby engine operating less than 500 hours in a 12-month rolling period	25 Pa. Code §129.112(c)(10)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
405	NSPS IIII Fire Pumps (4)	800 hp each	Diesel Fuel	Emergency standby engine operating less than 500 hours in a 12-month rolling period	25 Pa. Code §129.112(c)(10)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
701	Wastewater Treatment System	N/A	Petroleum Liquids	N/A - Not a Source of NO <sub>x</sub>		
801	NSPS Subpart VV Fugitive Leaks	N/A	N/A	N/A - Not a Source of NO <sub>x</sub>		
T001	NSPS Kb Ext Float Tanks	N/A	Petroleum Liquids	N/A - Not a Source of NO <sub>x</sub>		
T002	NSPS Kb Int Float Tanks	N/A	Petroleum Liquids	N/A - Not a Source of NO <sub>x</sub>		
T003	NESHAP Subpart R Tanks	N/A	Petroleum Liquids	N/A - Not a Source of NO <sub>x</sub>		
T004	NESHAP Subpart EEEE Tanks	N/A	Petroleum Liquids	N/A - Not a Source of NO <sub>x</sub>		
C01	West Cold Flare (Modified)	240 cf/hr	Process Gas and Natural Gas	A flare primarily used for air pollution control	25 Pa. Code §129.112(c)(8)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
C02	East Cold Flare (New Tanks Project)	117 cf/hr	Process Gas and Natural Gas	A flare primarily used for air pollution control	25 Pa. Code §129.112(c)(8)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.

<sup>(a)</sup> The previous iteration of RACT (RACT II Rule) was promulgated in April 2016. During the RACT II evaluation period, the Facility underwent a reconfiguration so that it could operate as a petroleum terminal instead of the petroleum refinery. As a result of this reconfiguration, these Source IDs were added to TVOP No. 23-00119 after completion of the RACT II evaluation and associated submittals to PADEP.

<sup>(b)</sup> Energy Transfer previously received guidance from U.S. EPA on August 1, 2013, that the engines do not meet the definition of emergency under the 40 CFR 60, Subpart ZZZZ requirements. However, TVOP No. 23-00119, Section D, Source 113, Condition 005 includes a federally enforceable requirement limiting each engine to 499 hours of operation in any 12-month consecutive period. Therefore, Source ID 113 will meet the presumptive RACT requirements of under 25 Pa. Code §129.112(c)(10).

**Table A-2**  
**RACT III Rule Applicability Summary - VOC Emitting Sources**  
**Energy Transfer Marketing & Terminals, LP - Marcus Hook, PA**

Source ID	Source Name	Source Capacity/ Throughput	Fuel/Throughput Material	RACT III Applicability		
				Classification	Citation	VOC Limitation/Requirement
031	Auxiliary Boiler 1	392.5 MMBtu/hr	Process Gas and Natural Gas	A combustion unit located at a major VOC facility not specified in subsection (c)	25 Pa. Code §129.112(d)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
033	Auxiliary Boiler 3	392.5 MMBtu/hr	Process Gas and Natural Gas	A combustion unit located at a major VOC facility not specified in subsection (c)	25 Pa. Code §129.112(d)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
034	Auxiliary Boiler 4	392.5 MMBtu/hr	Process Gas and Natural Gas	A combustion unit located at a major VOC facility not specified in subsection (c)	25 Pa. Code §129.112(d)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
101 <sup>(a)</sup>	Refrigerated Ethane Tank (300K BBL)	300K BBL	Ethane	VOC air contamination source with PTE <2.7 tpy VOC	25 Pa. Code §129.112(c)(2)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
102 <sup>(a)</sup>	Refrigerated Propane Tank (500K BBL)	50K BBL	Propane	VOC air contamination source with PTE >2.7 tpy VOC	25 Pa. Code §129.114(c)	Case-by-case RACT determination.
103	NSPS Subpart VVa Fugitive Equipment Leaks	N/A	N/A	VOC air contamination source with PTE >2.7 tpy VOC	24 Pa. Code §129.114(c)	Case-by-case RACT determination.
104 <sup>(a)</sup>	Marine Vessel Loading (Refrigerated)	N/A	Ethane/Propane/Butane	VOC air contamination source with PTE >2.7 tpy VOC	25 Pa. Code §129.114(c)	Case-by-case RACT determination.
105 <sup>(a)</sup>	Cavern	N/A	N/A	VOC air contamination source with PTE >2.7 tpy VOC	25 Pa. Code §129.114(c)	Case-by-case RACT determination.
106A <sup>(a)</sup>	Demethanizer	N/A	Ethane/Propane/Methane	VOC air contamination source with PTE >2.7 tpy VOC	25 Pa. Code §129.114(c)	Case-by-case RACT determination.
111 <sup>(a)</sup>	Natural Gasoline Loading Rack	N/A	Pentane/Naptha/Natural gas	VOC air contamination source with PTE >2.7 tpy VOC	25 Pa. Code §129.114(c)	Case-by-case RACT determination.
112	New Cooling Towers	1.8 MGPH	Water	VOC air contamination source with PTE >2.7 tpy VOC	25 Pa. Code §129.114(c)	Case-by-case RACT determination.
115	Marine Vessel Loading	N/A	Petroleum Products	VOC air contamination source with PTE >2.7 tpy VOC	25 Pa. Code §129.114(i)	Case-by-case RACT determination.
116	Marine Vessel Ballasting	N/A	N/A	N/A - Not a Source of VOC		
117	Refrigerated Ethane Tank (300K BBL)	300K BBL	Ethane	VOC air contamination source with PTE <2.7 tpy VOC	25 Pa. Code §129.112(c)(2)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
118	Refrigerated Butane Tank (575K BBL)	575K BBL	Butane	VOC air contamination source with PTE <2.7 tpy VOC	25 Pa. Code §129.112(c)(2)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.

**Table A-2**  
**RACT III Rule Applicability Summary - VOC Emitting Sources**  
**Energy Transfer Marketing & Terminals, LP - Marcus Hook, PA**

Source ID	Source Name	Source Capacity/ Throughput	Fuel/Throughput Material	RACT III Applicability		
				Classification	Citation	VOC Limitation/Requirement
119	Refrigerated Propane Tank (900K BBL)	900K BBL	Propane	VOC air contamination source with PTE >2.7 tpy VOC	25 Pa. Code §129.114(c)	Case-by-case RACT determination.
120	Refrigerated Propane Tank (589K BBL)	589K BBL	Propane	VOC air contamination source with PTE >2.7 tpy VOC	25 Pa. Code §129.114(c)	Case-by-case RACT determination.
121	Tank 139 Int Float 6.5 MBBL	6.5M BBL	Petroleum Liquids	Refer to Source IDs T002 and T003		
122	Tank 130 Ext Float 208.5 MBBL	208.5M BBL	Petroleum Liquids	Refer to Source ID T001		
123	Tank 131 Ext Float 208.5 MBBL	208.5M BBL	Petroleum Liquids	Refer to Source ID T001		
128	Tank 234 Int Float 70.1 MBBL	70.1M BBL	Petroleum Liquids	Refer to Source IDs T002 and T003		
130	Tank 132 Int Float 14.6 MBBL	14.6M BBL	Petroleum Liquids	Refer to Source IDs T002 and T003		
132	Tank 242 Int Float 69.2 MBBL	69.2M BBL	Petroleum Liquids	Refer to Source ID T002		
133	Tank 246 Int Float 54.4 MBBL	52.4M BBL	Petroleum Liquids	Refer to Source IDs T002 and T003		
134	Tank 248 Int Float 52.4 MBBL	52.4M BBL	Petroleum Liquids	Refer to Source IDs T002 and T003		
136	Tank 250 Int Float 80.4 MBBL	80.4M BBL	Petroleum Liquids	Refer to Source IDs T002 and T003		
139	Existing Cooling Towers	475 GPH	Recycle Water	VOC air contamination source with PTE >2.7 tpy VOC	25 Pa. Code §129.114(i)	Case-by-case RACT determination.
146 <sup>(b)</sup>	Tank 344 Fixed Roof 190.3 MBBL	190.3M BBL	Petroleum Liquids	Refer to Source ID T003		
148	Tank 352 Int Float 179.7 MBBL	179.7M BBL	Petroleum Liquids	Refer to Source IDs T002 and T003		
149	Tank 353 Int Float 189.7 MBBL	189.7M BBL	Petroleum Liquids	Refer to Source IDs T002 and T003		
150	Tank 354 Int Float 182.2 MBBL	182.2M BBL	Petroleum Liquids	Refer to Source IDs T002 and T003		
151	Tank 355 Int Float 189.7 MBBL	189.7M BBL	Petroleum Liquids	Refer to Source IDs T002 and T003		
177	Tank 524 Int Float 75.7 MBBL	75.7M BBL	Petroleum Liquids	Refer to Source IDs T002 and T003		
178	Tank 527 Int Float 69.7 MBBL	69.7M BBL	Petroleum Liquids	Refer to Source ID T002 and T004		
179	Tank 528 Ext Float 149.2 MBBL	149.2M BBL	Petroleum Liquids	Refer to Source ID T001 and T003		
180	Tank 529 Ext Float 149.2 MBBL	149.2M BBL	Petroleum Liquids	Refer to Source ID T001		
182	Tank 594 Ext Float 81.3 MBBL	81.3M BBL	Petroleum Liquids	Refer to Source ID T002		
188	Tank 607 Int Float 100 MBBL	100M BBL	Petroleum Liquids	Refer to Source ID T002		
190	Tank 609 Int Float 98.17 MBBL	98.17M BBL	Petroleum Liquids	Refer to Source IDs T002 and T004		
192	Tank 611 Int Float 87.8 MBBL	87.8M BBL	Petroleum Liquids	Refer to Source ID T002		

**Table A-2**  
**RACT III Rule Applicability Summary - VOC Emitting Sources**  
**Energy Transfer Marketing & Terminals, LP - Marcus Hook, PA**

Source ID	Source Name	Source Capacity/ Throughput	Fuel/Throughput Material	RACT III Applicability		
				Classification	Citation	VOC Limitation/Requirement
202	Tank 3 Int Float 41.0 MBBL	41.0M BBL	Petroleum Liquids	Refer to Source IDs T002 and T004		
204	Tank 253 Int Float 90.5 MBBL	90.5M BBL	Petroleum Liquids	Refer to Source ID T002		
212	Tank 610 Int Float 96.0 MBBL	96.0M BBL	Petroleum Liquids	Refer to Source ID T003		
225	Tank 638 Int Float 87.8 MBBL	87.8M BBL	Petroleum Liquids	Refer to Source IDs T002 and T004		
302	Tank 2 Int Float 182.9 MBBL	182.9M BBL	Petroleum Liquids	Refer to Source IDs T002 and T004		
357	Tank 357 Int Float 182.9 MBBL	182.9M BBL	Petroleum Liquids	Refer to Source ID T002		
358	Tank 358 Int Float 182.9 MBBL	182.9M BBL	Petroleum Liquids	Refer to Source ID T002		
402	Blind Changing	N/A	Petroleum Liquids	VOC air contamination source with PTE >2.7 tpy VOC	25 Pa. Code §129.114(i)	Case-by-case RACT determination.
801	NSPS Subpart VV Fugitive Leaks	N/A	N/A	VOC air contamination source with PTE >2.7 tpy VOC	25 Pa. Code §129.114(i)	Case-by-case RACT determination.
C01	West Cold Flare (Modified)	240 cf/hr	Process Gas and Natural Gas	A flare primarily used for air pollution control	25 Pa. Code §129.112(c)(8)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
C02	East Cold Flare (New Tanks Project)	117 cf/hr	Process Gas and Natural Gas	A flare primarily used for air pollution control	25 Pa. Code §129.112(c)(8)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.

<sup>(a)</sup> The previous iteration of RACT (RACT II Rule) was promulgated in April 2016. During the RACT II evaluation period, the Facility underwent a reconfiguration so that it could operate as a petroleum terminal instead of the petroleum refinery. As a result of this reconfiguration, these Source IDs were added to TVOP No. 23-00119 after completion of the RACT II evaluation and associated submittals to PADEP.

<sup>(b)</sup> Source has been emptied and deactivated and has not been in operation for over five years as of this notification.

**Table A-3**  
**RACT III Exempt Source Summary**  
**Energy Transfer Marketing & Terminals, LP - Marcus Hook, PA**

Source ID	Source Name	Pollutant	Reason for Exemption	RACT III Citation
113	(6) Diesel Engine Pumps	VOC	PTE less than 1 tpy	25 Pa. Code §129.111(c)
121	Tank 139 Int Float 6.5 MBBL	VOC	Refer to Source IDs T002 and T003	
122	Tank 130 Ext Float 208.5 MBBL	VOC	Refer to Source ID T001	
123	Tank 131 Ext Float 208.5 MBBL	VOC	Refer to Source ID T001	
128	Tank 234 Int Float 70.1 MBBL	VOC	Refer to Source IDs T002 and T003	
130	Tank 132 Int Float 14.6 MBBL	VOC	Refer to Source IDs T002 and T003	
132	Tank 242 Int Float 69.2 MBBL	VOC	Refer to Source ID T002	
133	Tank 246 Int Float 54.4 MBBL	VOC	Refer to Source IDs T002 and T003	
134	Tank 248 Int Float 52.4 MBBL	VOC	Refer to Source IDs T002 and T003	
136	Tank 250 Int Float 80.4 MBBL	VOC	Refer to Source IDs T002 and T003	
146	Tank 344 Fixed Roof 190.3 MBBL	VOC	Refer to Source ID T003	
148	Tank 352 Int Float 179.7 MBBL	VOC	Refer to Source IDs T002 and T003	
149	Tank 353 Int Float 189.7 MBBL	VOC	Refer to Source IDs T002 and T003	
150	Tank 354 Int Float 182.2 MBBL	VOC	Refer to Source IDs T002 and T003	
151	Tank 355 Int Float 189.7 MBBL	VOC	Refer to Source IDs T002 and T003	
177	Tank 524 Int Float 75.7 MBBL	VOC	Refer to Source IDs T002 and T003	
178	Tank 527 Int Float 69.7 MBBL	VOC	Refer to Source ID T002 and T004	
179	Tank 528 Ext Float 149.2 MBBL	VOC	Refer to Source ID T001 and T003	
180	Tank 529 Ext Float 149.2 MBBL	VOC	Refer to Source ID T001	
182	Tank 594 Ext Float 81.3 MBBL	VOC	Refer to Source ID T002	
188	Tank 607 Int Float 100 MBBL	VOC	Refer to Source ID T002	
190	Tank 609 Int Float 98.17 MBBL	VOC	Refer to Source IDs T002 and T004	
192	Tank 611 Int Float 87.8 MBBL	VOC	Refer to Source ID T002	
202	Tank 3 Int Float 41.0 MBBL	VOC	Refer to Source IDs T002 and T004	
204	Tank 253 Int Float 90.5 MBBL	VOC	Refer to Source ID T002	
212	Tank 610 Int Float 96.0 MBBL	VOC	Refer to Source ID T003	
225	Tank 638 Int Float 87.8 MBBL	VOC	Refer to Source IDs T002 and T004	
300	MISC Tanks	VOC	Subject to 25 Pa. Code §129.56	25 Pa. Code §129.111(a)
302	Tank 2 Int Float 182.9 MBBL	VOC	Refer to Source IDs T002 and T004	
357	Tank 357 Int Float 182.9 MBBL	VOC	Refer to Source ID T002	
358	Tank 358 Int Float 182.9 MBBL	VOC	Refer to Source ID T002	
367	Vehicle Refueling - Diesel	VOC	PTE less than 1 tpy	25 Pa. Code §129.111(c)
368	Vehicle Refueling - Gasoline	VOC	Subject to 25 Pa. Code §129.57 and §129.61	25 Pa. Code §129.111(a)
403	NESHAP ZZZZ Fire Pumps (2)	VOC	PTE less than 1 tpy	25 Pa. Code §129.111(c)
404	NSPS IIII Emergency Generator	VOC	PTE less than 1 tpy	25 Pa. Code §129.111(c)
405	NSPS IIII Fire Pumps (4)	VOC	PTE less than 1 tpy	25 Pa. Code §129.111(c)
701	Wastewater Treatment System	VOC	PTE less than 1 tpy	25 Pa. Code §129.111(c)
T001	NSPS Kb Ext Float Tanks	VOC	Subject to 25 Pa. Code §129.56	25 Pa. Code §129.111(a)
T002	NSPS Kb Int Float Tanks	VOC	Subject to 25 Pa. Code §129.56	25 Pa. Code §129.111(a)
T003	NESHAP Subpart R Tanks	VOC	Subject to 25 Pa. Code §129.56	25 Pa. Code §129.111(a)
T004	NESHAP Subpart EEEE Tanks	VOC	Subject to 25 Pa. Code §129.56	25 Pa. Code §129.111(a)

**Table A-4**  
**RACT III Source Inventory**  
**Energy Transfer Marketing & Terminals, LP - Marcus Hook, PA**

Source ID	Source Name	Source Description	Make	Model	Location	Capacity	Fuel/Material Stored
031	Auxiliary Boiler 1	Dual Fuel Boiler	Foster Wheeler	AG5257	Marcus Hook Terminal	392.5 MMBtu/hr	Process Gas and Natural Gas
033	Auxiliary Boiler 3	Dual Fuel Boiler	Foster Wheeler	AG5257	Marcus Hook Terminal	392.5 MMBtu/hr	Process Gas and Natural Gas
034	Auxiliary Boiler 4	Dual Fuel Boiler	Foster Wheeler	AG5257	Marcus Hook Terminal	392.5 MMBtu/hr	Process Gas and Natural Gas
101	Refrigerated Ethane Tank (300K BBL)	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	300K BBL	Ethane
102	Refrigerated Propane Tank (500K BBL)	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	50K BBL	Propane
103	NSPS Subpart VVa Fugitive Equipment Leaks	Fugitive Emissions	N/A	N/A	Marcus Hook Terminal	N/A	N/A
104	Marine Vessel Loading (Refrigerated)	Loading Operations	Self-constructed	Custom Design	Marcus Hook Terminal	N/A	Ethane/Propane/Butane
105	Cavern	Cavern	Self-constructed	Custom Design	Marcus Hook Terminal	N/A	N/A
106A	Demethanizer	Natural Gas Processing Unit	Self-constructed	Custom Design	Marcus Hook Terminal	N/A	Ethane/Propane/Methane
111	Natural Gasoline Loading Rack	Loading Operations	Unknown	Unknown	Marcus Hook Terminal	N/A	Naphtha
112	New Cooling Towers	Cooling Tower	Cooling Tower Depot	CFF-363633-3I-28	Marcus Hook Terminal	1.8 Mgal/hr	Water
113	(6) Diesel Engine Pumps	Diesel Pumps	Caterpillar	3606/3512/3516	Marcus Hook Terminal	Various	#2 Oil
115	Marine Vessel Loading	Loading Operations	Unknown	Unknown	Marcus Hook Terminal	N/A	Petroleum Products
116	Marine Vessel Ballasting	Ballasting	Unknown	Unknown	Marcus Hook Terminal	N/A	Ballast Water
117	Refrigerated Ethane Tank (300K BBL)	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	300K BBL	Ethane
118	Refrigerated Butane Tank (575K BBL)	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	575K BBL	Butane
119	Refrigerated Propane Tank (900K BBL)	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	900K BBL	Propane
120	Refrigerated Propane Tank (589K BBL)	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	589K BBL	Propane
121	Tank 139 Int Float 6.5 MBBL	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	6.5M BBL	Petroleum Liquids
122	Tank 130 Ext Float 208.5 MBBL	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	208.5M BBL	Petroleum Liquids
123	Tank 131 Ext Float 208.5 MBBL	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	208.5M BBL	Petroleum Liquids

**Table A-4**  
**RACT III Source Inventory**  
**Energy Transfer Marketing & Terminals, LP - Marcus Hook, PA**

Source ID	Source Name	Source Description	Make	Model	Location	Capacity	Fuel/Material Stored
128	Tank 234 Int Float 70.1 MBBL	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	70.1M BBL	Petroleum Liquids
130	Tank 132 Int Float 14.6 MBBL	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	14.6M BBL	Petroleum Liquids
132	Tank 242 Int Float 69.2 MBBL	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	69.2M BBL	Petroleum Liquids
133	Tank 246 Int Float 54.4 MBBL	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	52.4M BBL	Petroleum Liquids
134	Tank 248 Int Float 52.4 MBBL	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	52.4M BBL	Petroleum Liquids
136	Tank 250 Int Float 80.4 MBBL	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	80.4M BBL	Petroleum Liquids
139	Existing Cooling Towers	Cooling Tower	Self-constructed	Custom Design	Marcus Hook Terminal	475 GPH	Recycle Water
146	Tank 344 Fixed Roof 190.3 MBBL	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	190.3M BBL	Petroleum Liquids
148	Tank 352 Int Float 179.7 MBBL	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	179.7M BBL	Petroleum Liquids
149	Tank 353 Int Float 189.7 MBBL	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	189.7M BBL	Petroleum Liquids
150	Tank 354 Int Float 182.2 MBBL	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	182.2M BBL	Petroleum Liquids
151	Tank 355 Int Float 189.7 MBBL	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	189.7M BBL	Petroleum Liquids
177	Tank 524 Int Float 75.7 MBBL	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	75.7M BBL	Petroleum Liquids
178	Tank 527 Int Float 69.7 MBBL	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	69.7M BBL	Petroleum Liquids
179	Tank 528 Ext Float 149.2 MBBL	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	149.2M BBL	Petroleum Liquids
180	Tank 529 Ext Float 149.2 MBBL	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	149.2M BBL	Petroleum Liquids
182	Tank 594 Ext Float 81.3 MBBL	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	81.3M BBL	Petroleum Liquids
188	Tank 607 Int Float 100 MBBL	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	100M BBL	Petroleum Liquids
190	Tank 609 Int Float 98.17 MBBL	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	98.17M BBL	Petroleum Liquids
192	Tank 611 Int Float 87.8 MBBL	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	87.8M BBL	Petroleum Liquids
202	Tank 3 Int Float 41.0 MBBL	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	41.0M BBL	Petroleum Liquids

**Table A-4**  
**RACT III Source Inventory**  
**Energy Transfer Marketing & Terminals, LP - Marcus Hook, PA**

Source ID	Source Name	Source Description	Make	Model	Location	Capacity	Fuel/Material Stored
204	Tank 253 Int Float 90.5 MBBL	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	90.5M BBL	Petroleum Liquids
212	Tank 610 Int Float 96.0 MBBL	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	96.0M BBL	Petroleum Liquids
225	Tank 638 Int Float 87.8 MBBL	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	87.8M BBL	Petroleum Liquids
300	MISC Tanks	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	N/A	Petroleum Liquids
302	Tank 2 Int Float 182.9 MBBL	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	182.9M BBL	Petroleum Liquids
357	Tank 357 Int Float 182.9 MBBL	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	182.9M BBL	Petroleum Liquids
358	Tank 358 Int Float 182.9 MBBL	Storage Tank	Self-constructed	Custom Design	Marcus Hook Terminal	182.9M BBL	Petroleum Liquids
367	Vehicle Refueling - Diesel	Refueling Operations	Unknown	Unknown	Marcus Hook Terminal	N/A	N/A
368	Vehicle Refueling - Gasoline	Refueling Operations	Unknown	Unknown	Marcus Hook Terminal	N/A	N/A
402	Blind Changing	Blind Changing Operations	Unknown	Unknown	Marcus Hook Terminal	N/A	Petroleum Liquids
403	NESHAP ZZZZ Fire Pumps (2)	Emergency Fire Pump	Detroit Diesel	8083/71247312	Marcus Hook Terminal	662 hp each	Diesel Fuel
404	NSPS IIII Emergency Generator	Emergency Generator	Caterpillar	C15	Marcus Hook Terminal	619 hp	Diesel Fuel
405	NSPS IIII Fire Pumps (4)	Emergency Fire Pump	Caterpillar	C18	Marcus Hook Terminal	800 hp each	Diesel Fuel
701	Wastewater Treatment System	Wastewater Treatment Facility	Unknown	Unknown	Marcus Hook Terminal	N/A	N/A
801	NSPS Subpart VV Fugitive Leaks	Fugitive Emissions	N/A	N/A	Marcus Hook Terminal	N/A	N/A
T001	NSPS Kb Ext Float Tanks	Storage Tank	N/A	N/A	Marcus Hook Terminal	N/A	Petroleum Liquids
T002	NSPS Kb Int Float Tanks	Storage Tank	N/A	N/A	Marcus Hook Terminal	N/A	Petroleum Liquids
T003	NESHAP Subpart R Tanks	Storage Tank	N/A	N/A	Marcus Hook Terminal	N/A	Petroleum Liquids
T004	NESHAP Subpart EEEE Tanks	Storage Tank	N/A	N/A	Marcus Hook Terminal	N/A	Petroleum Liquids
C01	West Cold Flare (Modified)	Flare	Flare Industries	FCA-3/10	Marcus Hook Terminal	240 cf/hr	Process Gas and Natural Gas
C02	East Cold Flare (New Tanks Project)	Flare	Flare Industries	Unknown	Marcus Hook Terminal	117 cf/hr	Process Gas and Natural Gas

**Table A-5  
RACT III Exemptions - PTE Calculations  
Energy Transfer Marketing & Terminals, LP - Marcus Hook, PA**

Source ID	Source Name	Pollutant	Source Capacity/ Throughput		Emissions Factor		PTE (tpy) <sup>(a)</sup>	Reason for Exemption
			Value	Unit	Value	Unit		
113	(6) Diesel Engine Pumps	VOC					0.91 <sup>(b)</sup>	PTE less than 1 tpy
367	Vehicle Refueling - Diesel	VOC					2.07E-03 <sup>(c)</sup>	PTE less than 1 tpy
403	NESHAP ZZZZ Fire Pumps (2)	VOC	662	hp	7.05E-04	lb/hp-hr <sup>(d)</sup>	0.12	PTE less than 1 tpy each
404	NSPS IIII Emergency Generator	VOC	619	hp	7.05E-04	lb/hp-hr <sup>(d)</sup>	0.11	PTE less than 1 tpy
405	NSPS IIII Fire Pumps (4)	VOC	800	hp	7.05E-04	lb/hp-hr <sup>(d)</sup>	0.14	PTE less than 1 tpy each
701	Wastewater Treatment System	VOC					0.9 <sup>(e)</sup>	PTE less than 1 tpy

<sup>(a)</sup> Calculations assume the following:

2,000	lb/ton
500	hr/yr

<sup>(b)</sup> The PTE is based on the permit limit of 0.91 tpy for all six pumps pursuant to TVOP No. 23-00119, Section D, Source ID 113, Condition #003.

<sup>(c)</sup> The PTE was calculated using an Energy Transfer workbook, calculations are attached.

<sup>(d)</sup> Emissions factor from AP-42 Table 3.4-1 for uncontrolled large diesel industrial engines.

<sup>(e)</sup> The PTE is based on the permit limit of 0.9 tpy pursuant to TVOP No. 23-00119, Section D, Source ID 701, Condition #001.

**TANKS 4.0.9d**  
**Emissions Report - Summary Format**  
**Tank Identification and Physical Characteristics**

**Identification**

User Identification:	MHIC - Tank #367
City:	Marcus Hook
State:	Pennsylvania
Company:	Sunoco Logistics Partners, L.P.
Type of Tank:	Horizontal Tank
Description:	Diesel Refueling Tank

**Tank Dimensions**

Shell Length (ft):	26.50
Diameter (ft):	8.00
Volume (gallons):	10,000.00
Turnovers:	6.00
Net Throughput(gal/yr):	60,000.00
Is Tank Heated (y/n):	N
Is Tank Underground (y/n):	N

**Paint Characteristics**

Shell Color/Shade:	Gray/Light
Shell Condition	Good

**Breather Vent Settings**

Vacuum Settings (psig):	-0.03
Pressure Settings (psig)	0.03

Meterological Data used in Emissions Calculations: Wilmington, Delaware (Avg Atmospheric Pressure = 14.72 psia)

**TANKS 4.0.9d**  
**Emissions Report - Summary Format**  
**Liquid Contents of Storage Tank**

**MHIC - Tank #367 - Horizontal Tank**  
**Marcus Hook, Pennsylvania**

Mixture/Component	Month	Daily Liquid Surf. Temperature (deg F)			Liquid Bulk Temp (deg F)	Vapor Pressure (psia)			Vapor Mol. Weight.	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
		Avg.	Min.	Max.		Avg.	Min.	Max.					
Distillate fuel oil no. 2	All	60.93	52.88	69.19	56.42	0.0067	0.0050	0.0088	130.0000			188.00	Option 1: VP60 = .0065 VP70 = .009

**TANKS 4.0.9d**  
**Emissions Report - Summary Format**  
**Individual Tank Emission Totals**

**Emissions Report for: Annual**

**MHIC - Tank #367 - Horizontal Tank**  
**Marcus Hook, Pennsylvania**

	Losses(lbs)		
Components	Working Loss	Breathing Loss	Total Emissions
Distillate fuel oil no. 2	1.25	2.89	4.14