

Sunoco Partners Marketing & Terminals L.P.

CO Limit Permit Modification

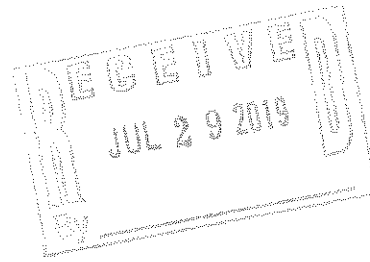
July 2019

STAMP: JUL 29 2019





ENERGY TRANSFER



July 29, 2019

Mr. James Rebarchak
Facilities Permitting Section
Pennsylvania Department of Environmental Protection
Bureau of Air Quality
2 East Main Street
Norristown, PA 19401

Dear Mr. Rebarchak:

Enclosed please find an application for Minor Operating Permit Modification for the Sunoco Partners Marketing and Terminals, L.P. (SPMT), Marcus Hook Industrial Complex. SPMT is proposing to lower the existing Carbon Monoxide (CO) emissions limitation on the Auxiliary Boilers (Source IDs 031, 033, and 034) at the facility. The new limit was determined by evaluating the projected steam demand and past actual CO emissions performance on a pound pollutant per pound steam basis. Details can be found in the application attached which contains the following:

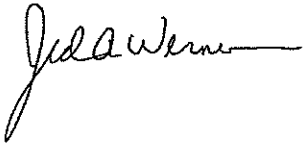
- Attachment A – Minor Operating Permit Modification Application Forms
- Attachment B – Detailed Emissions Limitation Analysis
- Attachment C – Municipal, State, and EPA Notifications

SPMT has found through an analysis of actual emissions from the Auxiliary Boilers that the annual CO emissions limit in the current Title V Operating Permit (TVOP #23-00119) is significantly greater than the source's actual emissions. SPMT is proposing to lower the existing consecutive 12-month emission limitation on CO for the Auxiliary Boilers from 107.61 tons to 27.23 tons. The proposed permit condition changes can be found in the table below:

Permit	Condition	Source ID	Limitation	Proposed Change
TVOP #23-00119 Section D.	#001 Emission Restrictions	031, 033, 034	(c) CO - 0.06 lbs/MMBtu (based on a 30-day rolling average) and 107.61 tons in any 12 consecutive month period;	(c) CO - 0.06 lbs/MMBtu (based on a 30-day rolling average) and <u>27.23 tons</u> in any 12 consecutive month period;

Please do not hesitate to call me at 610-670-3297 with any comments or questions regarding this minor operating permit modification application.

Sincerely,

A handwritten signature in black ink, appearing to read "Jed A. Werner". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jed A. Werner,
Air Permitting Manager
Energy Transfer, L.P.

Enclosures: 3 copies of SPMT Minor Operating Permit Modification Application
Check in the amount of \$750.00

VENDOR 014495 CHECK NUMBER 110323

ERM Account Number:

PLEASE DETACH AND RETAIN FOR YOUR RECORDS

INVOICE NUMBER	DATE	VOUCHER NO.	AMOUNT
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CHECKREQUEST	07/08/19	275115	750.00
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Sonoco Partners
RECEIVED
JUL 29 2019
23-00119
Modification

110323

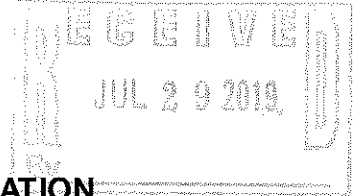
TOTAL: 750.00

**ATTACHMENT A MINOR OPERATING PERMIT MODIFICATION APPLICATION
FORMS**

July 2019



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY



MINOR OPERATING PERMIT MODIFICATION APPLICATION

Section 1: General Information

FOR OFFICIAL USE ONLY

Operating Permit No: _____
Reviewed by: _____
Date: _____

1.1 Plant Information

Tax Id: 23-3102655 Firm Name: Sunoco Partners Marketing & Terminals L.P.
Plant Code: 3 Plant Name: Marcus Hook Industrial Complex
NAICS Code: 493190 Description of NAICS Code: Other Warehousing and Storage
County: Delaware Municipality: Marcus Hook

1.2 Contact Information


Name: Kevin W. Smith Title: Specialist - Environmental Compliance
Address: 100 Green Street, Marcus Hook, PA 19061-0426

Telephone Number: (610) 859-1279

1.3 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.

Subject to the penalties of Title 18 Pa. C.S. Section 4904 and 35 P.S. Section 4009 (b) (2), I certify under the 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. I further certify that the proposed modification meets the criteria for use of the minor permit modification procedures contained in 25 Pa. Code Section 127.462.

(Signed):  Date: 7 / 29 / 19

Named (typed): Edward G. Human Title: Director of MHC Operations



MINOR OPERATING PERMIT MODIFICATION APPLICATION
 (Please read instructions carefully before completing this application)

Section 2: Facility Inventory List

Indicate all sources that are affected by the proposed modification by completing the following table. Duplicate this page as necessary.

Number	Company Designation	Unit Type (Boilers, Incinerators, etc.)
031	Auxiliary Boiler 1	Boiler
033	Auxiliary Boiler 3	Boiler
034	Auxiliary Boiler 4	Boiler



Section 3: Facility Information

Complete this section **ONLY** if the changes are for the entire facility. If changes are for a source or sources, skip this Section and complete Section 4 for each Source in which a change is proposed.

A) Briefly describe all changes to this facility: Not Applicable

B) If changes involve an increase in actual emissions, please complete the following table:

Pollutant Name	CAS Number	Change in Actual Emissions (+ or -)
Not Applicable	Not Applicable	Not Applicable

C) Date on which proposed change is scheduled to occur: Not Applicable

D) List the proposed language for revising the operating permit condition proposed to be changed:

Existing Operating Permit Condition or Condition Number	Proposed Language for Permit Condition
Not Applicable	Not Applicable



MINOR OPERATING PERMIT MODIFICATION APPLICATION
 (Please read instructions carefully before completing this application)

Section 4: Source Information

Complete this section for each source on which a change is to occur in this facility. Duplicate this Section as needed.

4.1 General Source Information

Source ID 031, 033, 034 Plan Approval or Operating Permit No: TVOP 23-00119

Name or Type of source: Auxiliary Boilers Rated Input: 427.5 MCF/hr

Manufacturer: Foster Wheeler Model Number: AG5257

Installation Date: 03/01/2003

4.2 Proposed Changes to Source

A) Briefly describe all changes to this facility: SPMT is proposing to lower the Carbon Monoxide (CO) emissions limit on the Auxiliary Boilers

B) If changes involve an increase in actual emissions, please complete the following table:

Pollutant Name	CAS Number	Change in Actual Emissions (+ or -)

C) Date on which proposed change is scheduled to occur:

Upon Operating Permit Modification Approval



COMMONWEALTH OF PENNSYLVANIA
 DEPARTMENT OF ENVIRONMENTAL PROTECTION
 BUREAU OF AIR QUALITY

MINOR OPERATING PERMIT MODIFICATION APPLICATION
 (Please read instructions carefully before completing this application)

4.2 Proposed Changes to Source (Continued)

C) List the proposed language for revising the operating permit condition proposed to be changed:

Existing Operating Permit Condition or Condition Number	Proposed Language for Permit Condition
TVOP 23-00119, Section D, Source ID: 031, Condition #001(c)	CO - 0.06 lbs/MMBtu (based on a 30-day rolling average and 27.23 tons in any 12 consecutive month period)
TVOP 23-00119, Section D, Source ID: 033, Condition #001(c)	CO - 0.06 lbs/MMBtu (based on a 30-day rolling average and 27.23 tons in any 12 consecutive month period)
TVOP 23-00119, Section D, Source ID: 034, Condition #001(c)	CO - 0.06 lbs/MMBtu (based on a 30-day rolling average and 27.23 tons in any 12 consecutive month period)



MINOR OPERATING PERMIT MODIFICATION APPLICATION
(Please read instructions carefully before completing this application)

Section 5. Citation and Listing of Applicable Requirements


Complete this Section only if the facility is a TITLE V facility. Cite and list any applicable requirements that will apply if the proposed change(s) occur.

Source ID	Citation Number	Citation Limitation
031, 033, & 034	#001(c)	CO - 27.23 tons in any 12 consecutive month period

Section 6. Certification of Compliance With All Applicable Requirements

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

Subject to the penalties of Title 18 Pa. C.S.A. Section 4904 and 35 P.S. Section 4009 (b)(2), I certify that I have the authority to submit this Minor Permit Modification Application on behalf of the applicant herein and that based on information and belief formed after reasonable inquiry, the facility is currently in compliance with all applicable requirements.

(Signed):  Date: 7 12 9 1 19

Name (typed): Edward G. Human Title: Director of MHC Operations

ATTACHMENT B DETAILED EMISSION LIMITATION ANALYSIS

July 2019

Sunoco Partners Marketing & Terminals, L.P.
 MHIC Minor Operating Permit Modification
 Detailed Emissions Limitation Analysis
 Boiler Baseline and Proposed Limit
 July 2019

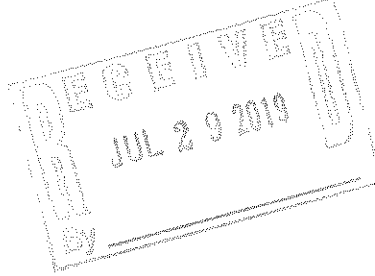
Table 1: Proposed CO Emission Factor Based on Historical Data

Year	Unit	CO (TPY)	Produced Steam (lb)	Total CO (TPY)	Total Annual Steam Produced (lb)	Parameter			CO Emission Factor (lb CO/lb steam) ¹ (Average ± Margin)
						lb CO / lb Steam	Average Factor (lb CO / lb Steam)	Margin	
2018	AB1	1.85	1,022,570,781	5.12	2,531,124,208	4.03E-06	8.03E-06	25%	1.00E-05
	AB3	0.30	687,174,940						
	AB4	2.97	821,378,487						
2017	AB1	2.62	1,041,953,612	5.65	2,588,352,263	4.36E-06	8.03E-06	25%	1.00E-05
	AB3	0.21	561,925,257						
	AB4	2.82	984,473,394						
2016	AB1	5.73	961,569,448	8.20	2,157,310,410	7.60E-06	8.03E-06	25%	1.00E-05
	AB3	0.40	475,969,799						
	AB4	2.06	699,771,164						
2015	AB1	1.21	1,129,932	14.04	1,639,983,316	1.71E-05	8.03E-06	25%	1.00E-05
	AB3	2.20	479,048,938						
	AB4	10.63	1,159,804,446						
2014	AB1	0.00	0	5.53	1,573,634,921	7.03E-06	8.03E-06	25%	1.00E-05
	AB3	2.49	863,978,481						
	AB4	3.04	709,656,440						

¹Data from Boiler CEMS

Table 2: Boiler Emission Increases by Project, Proposed CO Emission Limit

Project #	Project Name	Steam Demand (lb/hr)	CO Emission Factor (lb CO/lb steam)	Project CO Emissions (lb/hr)	Project CO Emissions (TPY)
23-0119	Project Mariner	210,000	1.00E-05	2.11	9.28
23-0119A	ME1 Deethanizer	62,000	1.00E-05	0.62	2.73
23-0119B	Natural Gasoline ME2	53,000	1.00E-05	0.53	2.33
23-0119D	Project Revolution	17,000	1.00E-05	0.17	0.75
23-0119E	RPD-6464	236,700	1.00E-05	2.40	10.50
23-0119F (Pending)	Project Phoenix	2,292	1.00E-05	0.02	0.10
		36,300	1.00E-05	0.36	1.60
TOTAL (Proposed CO Emission Limit, TPY):					27.23



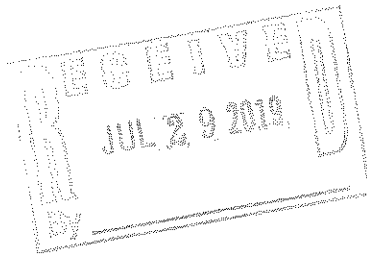
ATTACHMENT C MUNICIPAL, STATE, AND EPA NOTIFICATIONS

July 2019



July 29, 2019

Josephine M. Laird
President
Borough Council
Borough of Marcus Hook
10th and Green Street
Marcus Hook, Pennsylvania, 19061



**RE: Sunoco Partners Marketing & Terminals L.P. – Marcus Hook
Municipal Notification**

Dear Ms. Laird:

Please be advised that Sunoco Partners Marketing & Terminals, L.P., located in the Borough of Marcus Hook, Delaware County, Pennsylvania, has submitted an Application for Minor Operating Permit Modification. This application has been submitted in order to reduce the annual Carbon Monoxide (CO) emissions limitation for Auxiliary Boilers (Source IDs: 031, 033 & 034) in the facility's Title V Operating Permit #23-00119.

This letter serves to satisfy the requirements in 25 Pa. Code §127.462 for municipal and county notification upon application for a Minor Operating Permit Modification.

Please contact me at 610-670-3297 if you require any additional information on this matter.

Sincerely,

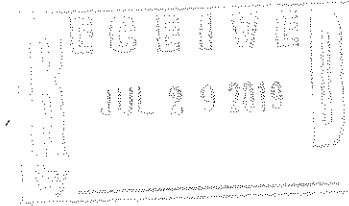
A handwritten signature in black ink, appearing to read "Jed A. Werner".

Jed A. Werner,
Air Permitting Manager
Energy Transfer, L.P.



July 29, 2019

John P. McBlain, Chairman
Delaware County Council
201 West Front Street
Media, PA 19063



**RE: Sunoco Partners Marketing & Terminals L.P. – Marcus Hook
County Notification**

Dear Mr. McBlain,

Please be advised that Sunoco Partners Marketing & Terminals, L.P., located in the Borough of Marcus Hook, Delaware County, Pennsylvania, has submitted an Application for Minor Operating Permit Modification. This application has been submitted in order to reduce the annual Carbon Monoxide (CO) emissions limitation for Auxiliary Boilers (Source IDs: 031, 033 & 034) in the facility's Title V Operating Permit #23-00119.

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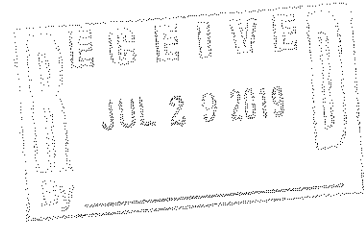
Jed A. Werner,
Air Permitting Manager
Energy Transfer, L.P.



ENERGY TRANSFER

July 29, 2019

NJDEP – Air Quality Permitting and Planning
401 East State Street
Trenton, NJ 08608



**RE: Sunoco Partners Marketing & Terminals L.P. – Marcus Hook
Municipal Notification**

To whom it concerns:

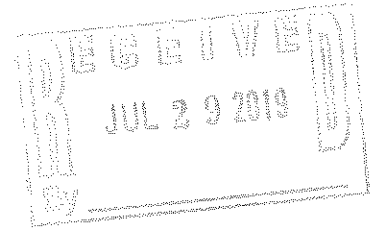
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This letter serves to satisfy the requirements in 25 Pa. Code §127.462 for municipal and county notification upon application for a Minor Operating Permit Modification.

Please contact me at 610-670-3297 if you require any additional information on this matter.

Sincerely,

Jed A. Werner,
Air Permitting Manager
Energy Transfer, L.P.



July 29, 2019

MDE – Air and Radiation Management Administration
1800 Washington Boulevard,
Baltimore, MD 21230

**RE: Sunoco Partners Marketing & Terminals L.P. – Marcus Hook
Municipal Notification**

To whom it concerns:

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Please contact me at 610-670-3297 if you require any additional information on this matter.

Sincerely,

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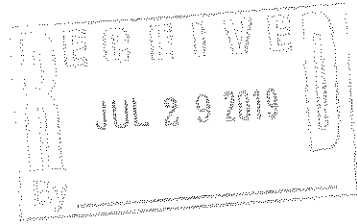
Jed A. Werner,
Air Permitting Manager
Energy Transfer, L.P.



ENERGY TRANSFER

July 29, 2019

DNREC Division of Air Quality
State Street Commons
100 West Water Street, Suite 6A
Dover, DE 19904



**RE: Sunoco Partners Marketing & Terminals L.P. – Marcus Hook
Municipal Notification**

To whom it concerns:

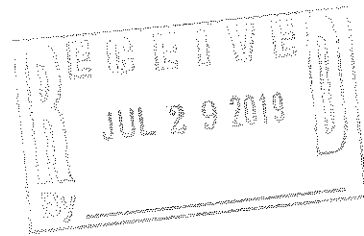
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Please contact me at 610-670-3297 if you require any additional information on this matter.

Sincerely,

Jed A. Werner,
Air Permitting Manager
Energy Transfer, L.P.



July 29, 2019

US EPA Region 3
Environmental Protection Agency
1650 Arch Street
Philadelphia, PA 19103-2029

**RE: Sunoco Partners Marketing & Terminals L.P. – Marcus Hook
Municipal Notification**

To Whom it May Concern:

Please be advised that Sunoco Partners Marketing & Terminals, L.P., located in the Borough of Marcus Hook, Delaware County, Pennsylvania, has submitted an Application for Minor Operating Permit Modification. This application has been submitted in order to reduce the annual Carbon Monoxide (CO) emissions limitation for Auxiliary Boilers (Source IDs: 031, 033 & 034) in the facility's Title V Operating Permit #23-00119.

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Sincerely,

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Jed A. Werner,
Air Permitting Manager
Energy Transfer, L.P.

RECEIPT

08/12/19

MedialNews Group

PENNSYLVANIA GROUP

Account: 1298088
 Name: TIM CELANO
 Company: ENVIRONMENTAL RESOURCES MANAGEMENT (ERM)
 Address: 75 VALLEY STREAM PARKWAY
 SUITE 200
 MALVERN, PA 19355
 Telephone: (484) 913-0300
 Fax: NEWSPAPER NOTICE Notice of Applicati
 Description:

Date: 08/12/19
 Start Date: 08/14/19
 Stop Date: 08/14/19
 Class: 1201 - Legal Notices
 Ad ID: 1854138
 Ad Title: CRMWISNIEWSKI
 Sales Person: Marylyn Wisniewski-Class Rep (M)
 Words: 233
 Lines: 36
 Agency Lines: 76
 Depth: 4.2
 Inserts: 2
 Blind Box:
 PO Number:

Ad Sample

NEWSPAPER NOTICE
Notice of Application for Minor
Operating Permit Modification
Title V Operating Permit # 23-00119
Delaware County

Sunoco Partners Marketing and Terminals, L.P. (SPMT) has submitted an Application for Minor Modification of its Title V Operating Permit # 23-00119 to the Pennsylvania Department of Environmental Protection in order to reduce the sulfur content of the fuel oil used in the existing 12-month emission limitation for the Auxiliary Boilers (Source ID: 031, 033, and 034) at the facility in Marcus Hook, Delaware County, Pennsylvania. This notice is being issued in accordance with 25 Pa Code §12.7462(c).

No change to actual emissions is expected as a result of this permit modification. SPMT is proposing to lower the existing consecutive 12-month emission limitation for CO from 107.51 tons to 27.23 tons.

Interested persons may submit written comments, suggestions or objections to such an application to the Department of Environmental Protection, Permitting Section, 2 East Main Street, Norristown, PA 19401, within twenty one (21) days of this notice. Written comments should include the name, address, and telephone number of the person submitting the comments along with the reference number of the proposed permit.

The Department will take final action on the proposed change within 60 days of the receipt of the complete minor operating permit application. A final notice of action will be published in the Pennsylvania Bulletin. DCT August 14, 2019.

Total: \$249.55
 Paid Amount: \$249.55
 Amount Due: \$0.00

Publication
Daily Times and Sunday Times, Daily & Sunday Times Digital

We Appreciate Your Business!
 Thank You TIM CELANO!