



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:

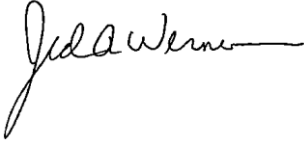
- Attachment A – Minor Operating Permit Modification Application Forms
- Attachment B – Detailed Emissions Limitation Analysis
- Attachment C – Municipal, State, and EPA Notifications

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 <del>107.61 tons</del> 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 that reads "Jed A. Werner" with a long horizontal flourish extending to the right.

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



### 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





**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

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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



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 2019  
 Name (typed): Edward G. Human Title: Director of MHC Operations



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	Parameter							
		CO (TPY)	Produced Steam (lb)	Total CO (TPY)	Total Annual Steam Produced (lb)	lb CO / lb Steam	Average Factor (lb CO / lb Steam)	Margin	CO Emission Factor (lb CO/lb steam) <sup>1</sup> (Average ± Margin)
2018	AB1	1.85	1,022,570,781	5.12	2,531,124,208	4.05E-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			
	AB3	0.21	561,925,257						
	AB4	2.82	984,473,394						
2016	AB1	5.73	981,569,448	8.20	2,157,310,410	7.60E-06			
	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			
	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			
	AB3	2.49	863,978,481						
	AB4	3.04	709,656,440						

<sup>1</sup>Data 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	9.23	
23-0119A	ME1 Deethanizer	62,000		0.62	2.73	
23-0119B	Natural Gasoline	53,000		0.53	2.33	
23-0119D	ME2	17,000		0.17	0.75	
23-0119E	Project Revolution	238,700		2.40	10.50	
RFD 6484	Methanol	2,292		0.02	0.10	
23-0119J (Pending)	Project Phoenix	36,300		0.36	1.60	
<b>TOTAL (Proposed CO Emission Limit, TPY):</b>					<b>27.23</b>	



**ENERGY TRANSFER**

July 29, 2019

Josephine M. Laird  
President  
Borough Council  
Borough of Marcus Hook  
10<sup>th</sup> 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 that reads "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.*



## ENERGY TRANSFER

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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*Air Permitting Manager*  
*Energy Transfer, L.P.*



**ENERGY TRANSFER**

July 29, 2019

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

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Municipal Notification**

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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

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Municipal Notification**

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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:

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