



Via Electronic Mail

January 10, 2024

David Smith
PA Department of Environmental Protection
Southeast Regional Office
Bureau of Air Quality
dssmith@pa.gov

**RE: Energy Transfer Marketing & Terminals L.P. – Marcus Hook Terminal
Marcus Hook Borough, Delaware County
Plan Approval 23-0119J: Plan Approval Extension Request**

Dear Mr. Smith:

Energy Transfer Marketing & Terminals L.P. (ETMT) submits this letter to request a Plan Approval Extension for Plan Approval 23-0119J for the Marcus Hook Terminal. Please note that this letter is intended to update and supersede our letter dated November 17, 2023, in which ETMT requested an extension to the date for commencement of construction of the sources authorized under Plan Approval 23-0119J. ETMT has decided to commence construction at this time, and therefore is no longer requesting an extension on that basis; however, Plan Approval 23-0119J expires on February 12, 2024, and therefore a plan approval extension is requested to allow for the completion of construction in accordance with Condition B.006(b) of the Plan Approval.

ETMT is planning to begin foundation work for the sources authorized by Plan Approval 23-0119J during the week of January 29, 2024. The construction schedule for this project, which is included as an attachment to this letter, indicates that construction will require a 3-year timeframe. ETMT respectfully requests PADEP to currently authorize an 18-month extension to Plan Approval 23-0119J until August 12, 2025.

The emission sources proposed as a part of Plan Approval 23-0119J will continue to meet current Best Available Control Technology (BACT) Standards. A BACT analysis was recently reviewed by PADEP for the pending Plan Approval 23-0119K application, and the requirements of Plan Approval 23-0119K will apply to Plan Approval 23-0119J sources. Therefore, no further analysis is needed.

A copy of the Plan Approval Extension Form, the Air Quality Fee Schedule, and the anticipated construction schedule is attached to this letter as well as a copy of the previously submitted check for \$750.

If you have any questions, please do not hesitate to contact me at (713) 989-7762 or via email at Lisa.Garcia@energytransfer.com.

Sincerely,



Lisa Garcia, P.E.

Sr. Manager – Engineering, E&C Environmental

cc: James Rebarchak, PADEP, jrebarchak@pa.gov
Jillian Gallagher, PADEP, jigallaghe@pa.gov
Heather Henry, PADEP, hehenry@pa.gov
Janine Tulloch-Reid, PADEP, jtullochre@pa.gov

Enclosure: Plan Approval Extension Form
Air Quality Fee Schedule
Anticipated Construction Schedule

Plan Approval Extension Form

PLAN APPROVAL EXTENSION FORM

Current Plan Approval Information				
Plan Approval No.: 23-0119J		Owner Name: Energy Transfer Marketing & Terminals L.P.		
Original Issued Date: 2/12/2021		Plant Name: Marcus Hook Terminal		
Current Expiration Date: 2/12/2024		Contact Name: Lisa Garcia		
Project Commenced Date: N/A		Contact Title: Sr. Manager - Engineering, E&C Environmental		
Contact Telephone: 713-989-7762		Contact Email: lisa.garcia@energytransfer.com		
Municipality: Marcus Hook Borough		Mailing Address: 100 Green Street		
County: Delaware		City: Marcus Hook	State: PA	Zip Code: 19061
List of Source(s) and/or Air Cleaning Devices Specified in the Plan Approval (attach additional pages as needed)				
Source ID	Source Name	Air Cleaning Device	Date of Completion	Operational Commencement Date
	See Attached			
Reason for Extension (see instructions)				
<input checked="" type="checkbox"/> (A) Plan Approval Extension to continue construction, modification, reactivation of the source(s) or installation of air cleaning device(s) in accordance with 25 Pa. Code §127.13(a).				
<input type="checkbox"/> (B) Plan Approval Extension to extend temporary operation to facilitate the shake-down of sources and air cleaning devices, to permit operation pending issuance of a permit under Subchapter F (relating to operating permit requirements) or Subchapter G (relating to Title V operating permits) or to allow the evaluation of the source(s) for compliance with applicable regulations and requirements in accordance with 25 Pa. Code §127.12b(d).				
<input type="checkbox"/> (C) Other (including the extension of the 18-month period specified in 25 Pa. Code §127.13(b)).				
Checklist				
<input checked="" type="checkbox"/> Included Air Quality Fees Schedule				
<input type="checkbox"/> Fees are not required in accordance with 25 Pa. Code § 127.702(i)(3); justification included				
<input checked="" type="checkbox"/> Included justification for the extension request				
<input checked="" type="checkbox"/> Included complete Compliance Review Form or Compliance Review Supplemental Form if one has not been submitted within 6 months from the date of this application				
<input checked="" type="checkbox"/> Plan Approval Extension Form signed by a responsible official				
Certification of Truth, Accuracy and Completeness				
I certify that, subject to the penalties of Title 18 Pa. C.S.A. Section 4904 and 35 P.S. Section 4009(b)(2), I am the responsible official having primary responsibility for the design and operation of the facilities to which this application applies and that the information provided in this application is true, accurate, and complete to the best of my knowledge, information, and belief formed after reasonable inquiry.				
Name (Type): Edward G. Human			Title: VP - Marcus Hook Operations	
Name (Signed): 			Date: 1/10/2024	

**Energy Transfer Marketing & Terminals LP
Marcus Hook Terminal
Plan Approval 23-0119J - Extension Request**

Source ID	Source Name	Installed/Startup Date	Reason for Extension
103	NSPS Subpart VVa Fugitive Equipment Leaks	Not built	Construction has not been completed
124	Refrigerated Ethane Storage Tank (600,000 bbl)	Not built	Construction has not been completed
125	Refrigerated Ethane Storage Tank (600,000 bbl)	Not built	Construction has not been completed
141	WSAC Systems (2)	Not built	Construction has not been completed
C04	Project Phoenix Cold Flare	Not built	Construction has not been completed
FML01	Natural Gas	Not built	Construction has not been completed
FML02	Process Gas	Not built	Construction has not been completed
Z01	NSPS Subpart VVa Fugitive Equipment	Not built	Construction has not been completed
Z141	WSAC Systems Fugitive Emissions	Not built	Construction has not been completed
ZC04	Project Phoenix Cold Flare Fugitive Emissions	Not built	Construction has not been completed

Air Quality Fee Schedule

AIR QUALITY FEES FOR PENDING* OR ISSUED** PLAN APPROVAL

Company Information				
Federal Tax ID: 23-310-2655		Firm Name: Energy Transfer Marketing & Terminals L.P.		
Permit # (If any): 23-0119J		Facility Name: Marcus Hook Terminal		
Municipality: Marcus Hook Borough		County: Delaware		
Contact Person Name: Lisa Garcia		Telephone Number: 713-989-7762		
E-mail: lisa.garcia@energytransfer.com				
Pending or Issued Plan Approval ***				
Line #	Check the appropriate boxes below	Type of Authorization	Fee 2021 - 2025	Total Fees
1	<input type="checkbox"/>	Minor Modification	\$1,500	
2	<input checked="" type="checkbox"/>	Extension	\$750	\$750
3	<input type="checkbox"/>	Transfer of Ownership	\$750	
4	<input type="checkbox"/>	Significant Modification, Ambient Impact Analysis	\$9,000	
5	<input type="checkbox"/>	Significant Modification, Reassessment of Control Technology	\$2,500	

* Pending plan approval is such that the Department has completed the technical review and published a notice in the *Pennsylvania Bulletin*. This is applicable only to Lines 4 and 5.

** Issued plan approval is such that the conditions of the plan approval have not been incorporated into an operating permit.

*** Pay maximum amount of fee when one or more authorizations are requested. For example, when a minor modification of a plan approval and a transfer of ownership are needed, please pay only the highest amount of fee (\$1,500).

Anticipated Construction Schedule

- January 2024 – Begin tank foundation
- February 2024 – Finalize detailed engineering design
- May 2024 – Procurement of critical equipment
- June 2024 – Initiate utility upgrades
- December 2024 – Equipment construction
- June 2026 – Energize PDC
- October 2026 – Tank mechanically complete
- January 2027 – Complete all construction activities and begin system commissioning and startup



COMMONWEALTH OF PENNSYLVANIA
 DEPARTMENT OF ENVIRONMENTAL PROTECTION
 BUREAU OF AIR QUALITY

AIR POLLUTION CONTROL ACT COMPLIANCE REVIEW FORM

Fully and accurately provide the following information, as specified. Attach additional sheets as necessary.

Type of Compliance Review Form Submittal (check all that apply)

- | | |
|--|---|
| <input type="checkbox"/> Original Filing | Date of Last Compliance Review Form Filing: |
| <input checked="" type="checkbox"/> Amended Filing | <u>12/14/2022</u> |

Type of Submittal

- | | | |
|---|---|---|
| <input type="checkbox"/> New Plan Approval | <input type="checkbox"/> New Operating Permit | <input type="checkbox"/> Renewal of Operating Permit |
| <input type="checkbox"/> Extension of Plan Approval | <input type="checkbox"/> Change of Ownership | <input checked="" type="checkbox"/> Periodic Submission (@ 6 mos) |
| <input type="checkbox"/> Other: _____ | | |

SECTION A. GENERAL APPLICATION INFORMATION

Name of Applicant/Permittee/("applicant")
 (non-corporations-attach documentation of legal name)

Energy Transfer Marketing & Terminals, L.P.

Address 8111 Westchester Drive, Suite 600
 Dallas, Texas 75225

Telephone 610-670-3297 **Taxpayer ID#** 23-310-2655

Permit, Plan Approval or Application ID#

Identify the form of management under which the applicant conducts its business (check appropriate box)

- | | | |
|--|---|---|
| <input type="checkbox"/> Individual | <input type="checkbox"/> Syndicate | <input type="checkbox"/> Government Agency |
| <input type="checkbox"/> Municipality | <input type="checkbox"/> Municipal Authority | <input type="checkbox"/> Joint Venture |
| <input type="checkbox"/> Proprietorship | <input type="checkbox"/> Fictitious Name | <input type="checkbox"/> Association |
| <input type="checkbox"/> Public Corporation | <input type="checkbox"/> Partnership | <input type="checkbox"/> Other Type of Business, specify below: |
| <input type="checkbox"/> Private Corporation | <input checked="" type="checkbox"/> Limited Partnership | |

Describe below the type(s) of business activities performed.

SIC Code 4226 – Petroleum & Chemical Bulk Stations & Terminals for Hire
 SIC Code 1321- Natural Gas Liquids

SECTION B. GENERAL INFORMATION REGARDING "APPLICANT"

If applicant is a corporation or a division or other unit of a corporation, provide the names, principal places of business, state of incorporation, and taxpayer ID numbers of all domestic and foreign parent corporations (including the ultimate parent corporation), and all domestic and foreign subsidiary corporations of the ultimate parent corporation with operations in Pennsylvania. Please include all corporate divisions or units, (whether incorporated or unincorporated) and privately held corporations. (A diagram of corporate relationships may be provided to illustrate corporate relationships.) Attach additional sheets as necessary.

Unit Name	Principal Places of Business	State of Incorporation	Taxpayer ID	Relationship to Applicant
Energy Transfer Marketing & Terminals L.P.	PA, NJ, NY, MD, VA, MA, OH, MI, IN, TX	TX	23-3102655	Applicant
Energy Transfer Operations GP LLC	PA, NJ, NY, MD, VA, MA, OH, MI, IN, TX	DE	23-3102660	General Partner of Applicant
Energy Transfer L.P.	PA, NJ, NY, MD, VA, MA, OH, MI, IN, TX, OK, NM, LA, IL, KY	DE	73-1493906	Ultimate Parent – owner of the General Partner of the Applicant
Subsidiaries of ultimate parent with operations in PA- See Attachment 3				

SECTION C. SPECIFIC INFORMATION REGARDING APPLICANT AND ITS "RELATED PARTIES"

Pennsylvania Facilities. List the name and location (mailing address, municipality, county), telephone number, and relationship to applicant (parent, subsidiary or general partner) of applicant and all Related Parties' places of business, and facilities in Pennsylvania. Attach additional sheets as necessary.

Unit Name	Street Address	County and Municipality	Telephone No.	Relationship to Applicant
see attachment #1				

Provide the names and business addresses of all general partners of the applicant and parent and subsidiary corporations, if any.

Name	Business Address

List the names and business address of persons with overall management responsibility for the process being permitted (i.e. plant manager).

Name	Business Address
see attachment #1	

Plan Approvals or Operating Permits. List all plan approvals or operating permits issued by the Department or an approved local air pollution control agency under the APCA to the applicant or related parties that are currently in effect or have been in effect at any time 5 years prior to the date on which this form is notarized. This list shall include the plan approval and operating permit numbers, locations, issuance and expiration dates. Attach additional sheets as necessary.

Air Contamination Source	Plan Approval/ Operating Permit#	Location	Issuance Date	Expiration Date
see attachment #2				

Compliance Background. (Note: Copies of specific documents, if applicable, must be made available to the Department upon its request.) List all documented conduct of violations or enforcement actions identified by the Department pursuant to the APCA, regulations, terms and conditions of an operating permit or plan approval or order by applicant or any related party, using the following format grouped by source and location in reverse chronological order. Attach additional sheets as necessary. See the definition of "documented conduct" for further clarification. Unless specifically directed by the Department, deviations which have been previously reported to the Department in writing, relating to monitoring and reporting, need not be reported.

Date	Location	Plan Approval/ Operating Permit#	Nature of Documented Conduct	Type of Department Action	Status: Litigation Existing/Continuing or Corrected/Date	Dollar Amount Penalty
9/29/2023	Marcus Hook Terminal	23-00119 & Plan Approval 23-0119E	Missing calibration precision test record and an open bucket of oily water observed during inspection.	NOV	Response to NOV submitted on 10/11/2023.	\$0
8/17/2023	Marcus Hook Terminal	23-00119 & Plan Approval 23-0119E	Auxiliary Boiler 1 annual tune-up not completed within 13 months of previous tune-up.	NOV	Response to NOV submitted on 8/24/2023.	\$0
02/22/23	Marcus Hook Terminal	23-00119 & Plan Approval 23-0119E	LDAR Program violations reported on semiannual compliance report and discovered during a voluntary LDAR audit.	NOV	CACP settlement 09/12/23	9/12/23 global settlement \$234,696
01/09/23	Marcus Hook Terminal	23-00119	Gasoline component release to the outdoor atmosphere.	NOV	Root Cause Analysis submitted to PADEP on 04/06/2023.	\$0
02/22/22	Marcus Hook Terminal	23-00119 & Plan Approval 23-0119E	LDAR Program violations reported on semiannual compliance report and discovered during PADEP inspection	NOV	CACP settlement 09/12/22	9/12/22 global settlement \$119,475
10/5/2021	Marcus Hook Terminal	23-00119	LDAR Program violations reported on semiannual compliance report	NOV	CACP settlement 09/12/22	9/12/22 global settlement \$119,475
08/04/21	Marcus Hook Terminal	23-00119	Propane release to the outdoor atmosphere.	NOV	CACP settlement 09/12/22	9/12/22 global settlement \$119,475
2/24/2021	Marcus Hook Terminal	23-00119	Butane release to the outdoor atmosphere	NOV/CACP	CACP settlement 11/4/2021	11/4/21 global settlement \$301,105
2/4/2021	Marcus Hook Terminal	23-00119	LDAR Program violations reported on semiannual compliance report	NOV/CACP	CACP settlement 11/4/2021	11/4/21 global settlement \$301,105
12/23/2020	Delmont Terminal	65-00354	Modifying an air contamination source without authorization	NOV/CACP	Corrected - GP-2 Permit issued by PADEP 10/12/2021	\$0
12/14/2020	Marcus Hook Terminal	23-00119	LDAR Program violations discovered during PADEP inspection	NOV/CACP	CACP settlement 11/4/2021	11/4/21 global settlement \$301,105
3/19/2020	Marcus Hook Terminal	23-00119	Failure to conduct multiple weekly truck rack inspections; oily water leaking from process water pipe into concrete conveyance; multiple pressure and temperature deviations on Diesel Engine 2B; V-29 carbon canister not changed out within 24 hours; and H-5 Truck Rack hose venting emissions not reported in annual air emissions inventories.	NOV/CACP	CACP settlement 11/4/2021	11/4/21 global settlement \$301,105
3/3/2020	Marcus Hook Terminal	23-00119	An application for a minor operating permit modification was not submitted prior to making a physical change.	NOV/CACP	CACP settlement 11/4/2021	11/4/21 global settlement \$301,105
5/16/2019	Belmont Terminal	V04-004	Operation of emergency generator on an air action day	NOV	Corrected	\$1,650
5/14/2019	Fullerton Terminal	39-00022	Failure to submit stack test within 60 days	NOV/CACP*	Joint CACP settlement for Fullerton/Kingston Terminals	\$3,200

5/9/2019	Marcus Hook Terminal	23-00119	Failure to conduct weekly inspections of loading rack	NOV/CACP	Entered into a CACP with DEP on 3/27/2020.	03/27/20 global settlement \$304,700
5/2/2019	Kingston Terminal	40-00025	Failure to submit stack test within 60 days	NOV/CACP*	Joint CACP settlement for Fullerton/Kingston Terminals	\$3,200
3/18/2019	Marcus Hook Terminal	23-00119	Butane release to the outdoor atmosphere	NOV/CACP	Entered into a CACP with DEP on 3/27/2020.	03/27/20 global settlement

List all incidents of deviations of the APCA, regulations, terms and conditions of an operating permit or plan approval or order by applicant or any related party, using the following format grouped by source and location in reverse chronological order. This list must include items both currently known and unknown to the Department. Attach additional sheets as necessary. See the definition of "deviations" for further clarification.

Date	Location	Plan Approval/ Operating Permit#	Nature of Deviation	Incident Status: Litigation Existing/Continuing Or Corrected/Date

CONTINUING OBLIGATION. Applicant is under a continuing obligation to update this form using the Compliance Review Supplemental Form if any additional deviations occur between the date of submission and Department action on the application.

VERIFICATION STATEMENT

Subject to the penalties of Title 18 Pa.C.S. Section 4904 and 35 P.S. Section 4009(b)(2), I verify under penalty of law that I am authorized to make this verification on behalf of the Applicant/Permittee. I further verify that the information contained in this Compliance Review Form is true and complete to the best of my belief formed after reasonable inquiry. I further verify that reasonable procedures are in place to ensure that "documented conduct" and "deviations" as defined in 25 Pa Code Section 121.1 are identified and included in the information set forth in this Compliance Review Form.



Signature

10/16/23
Date

Jonathan A. Hunt

Name (Print or Type)

Senior Vice President, Energy Transfer L.P.

Title

Attachment #1: Names, Locations and Facility Managers for all Sunoco Partners Marketing & Terminals L.P. Related Part

Facility Name	Owner/Operator	Federal Tax ID #	SIC Code	Facility Address	City	Zip Code	County
Blawnox Term.	Energy Transfer Marketing & Terminals L.P.	23-3102655	4226	Freeport Road & Boyd	Pittsburgh	15238	Allegheny
Delmont Term.	Energy Transfer Marketing & Terminals L.P.	23-3102655	4226	Route 66	North Delmont	15626	Westmoreland
Eldorado (Altoona) Term.	Energy Transfer Marketing & Terminals L.P.	23-3102655	4226	Rt. 764 N. & Sugar Run Road	Altoona	16601	Blair
Fullerton Term.	Energy Transfer Marketing & Terminals L.P.	23-3102655	4226	2480 Main Street	Fullerton	18052	Lehigh
Kingston Term.	Energy Transfer Marketing & Terminals L.P.	23-3102655	4226	Rt. 11, Box 1479	Kingston	18704-3102	Luzerne
Malvern Term.	Energy Transfer Marketing & Terminals L.P.	23-3102655	4226	41 Malin Road	Malvern	10355	Chester
Marcus Hook Terminal	Energy Transfer Marketing & Terminals L.P.	23-3102655	4226	100 Green Street	Marcus Hook	19061	Delaware
Mechanicsburg Term.	Energy Transfer Marketing & Terminals L.P.	23-3102655	4226	5145 Simpson Ferry Road	Mechanicsburg	17055	Cumberland
Montello Term.	Energy Transfer Marketing & Terminals L.P.	23-3102655	4226	PO Box 2089, Fritztown Road	Montello	19608	Berks
Northumberland Term.	Energy Transfer Marketing & Terminals L.P.	23-3102655	4226	Rd#1, Box 285 E	Northumberland	17857	Northumberland
Pittsburgh Term.	Energy Transfer Marketing & Terminals L.P.	23-3102655	4226	5733 Butler Street	Pittsburgh	15210	Allegheny
Twin Oaks Term.	Energy Transfer Marketing & Terminals L.P.	23-3102655	4226	4041 Market Street	Aston	19014	Delaware

Attachment #2: Plan Approvals & Operating Permits

Facility	Owner / Operator	State	Permit Type	Permit #	Effective	Expiration
Blawnox	Energy Transfer Marketing & Terminals L.P.	PA	ACHD Synthetic Minor	0011-OP21	07/07/2021	07/06/2026
Delmont	Energy Transfer Marketing & Terminals L.P.	PA	Title V Permit	65-00354	03/25/2022	03/11/2027
Eldorado	Energy Transfer Marketing & Terminals L.P.	PA	Synthetic Minor	07-05025	07/01/2019	06/30/2024
Fullerton	Energy Transfer Marketing & Terminals L.P.	PA	Synthetic Minor	39-00022	09/17/2019	09/17/2024
Kingston	Energy Transfer Marketing & Terminals L.P.	PA	Synthetic Minor	40-00025	09/17/2019	09/17/2024
Marcus Hook	Energy Transfer Marketing & Terminals L.P.	PA	Title V Permit	23-00119	08/25/2020	04/01/2025
Marcus Hook	Energy Transfer Marketing & Terminals L.P.	PA	Plan Approval Extension	23-0119E	2/22/2023	8/21/2024
Marcus Hook	Energy Transfer Marketing & Terminals L.P.	PA	Plan Approval	23-0119J	02/12/2021	02/12/2024
Malvern	Energy Transfer Marketing & Terminals L.P.	PA	Title V Permit	15-00043	05/09/2019	05/08/2024
Mechanicsburg	Energy Transfer Marketing & Terminals L.P.	PA	Title V Permit	21-05029	07/01/2019	06/30/2024
Montello	Energy Transfer Marketing & Terminals L.P.	PA	Title V Permit	06-05064	10/01/2019	9/30/2024
Northumberland	Energy Transfer Marketing & Terminals L.P.	PA	Synthetic Minor	49-00019	05/08/2020	05/07/2025
Pittsburgh	Energy Transfer Marketing & Terminals L.P.	PA	ACHD Title V Permit	0007	02/25/2021	02/04/2026
Twin Oaks	Energy Transfer Marketing & Terminals L.P.	PA	Title V Permit	23-00045	03/24/2021	03/23/2026

Attachment 3
APCA Compliance Review Form
Subsidiaries with Operations in Pennsylvania of
Parent Energy Transfer L.P. of Applicant Energy Transfer Marketing & Terminals L.P.
October 2023

Entity Name	Entity Main Address	Domestic Jurisdiction	Taxpayer ID	Relationship to Applicant
Sunoco Pipeline L.P.	8111 Westchester Drive Dallas, TX 75225	TX	23-3102656	Indirect subsidiary of ultimate parent
Regency Marcellus Gas Gathering LLC	101 West Third Street, 3 rd Flr Williamsport, PA 17701	DE	27-2142725	Indirect subsidiary of ultimate parent
ETC Production LLC	8111 Westchester Drive Dallas, TX 75225	DE	88-1911493	Indirect subsidiary of ultimate parent
ETC Northeast Pipeline LLC	6051 Wallace Road Ext., Suite 300 Wexford, PA 15090	DE	26-2863396	Indirect subsidiary of ultimate parent
ETC Northeast Field Services LLC	6051 Wallace Road Ext., Suite 300 Wexford, PA 15090	DE	35-2497449	Indirect subsidiary of ultimate parent
ET Rover Pipeline LLC	1300 Main Street, Houston, TX 77002	DE	46-5655475	Indirect subsidiary of ultimate parent and Member Rover Pipeline LLC joint venture
Rover Pipeline LLC	1300 Main Street, Houston, TX 77002	DE	47-1958303	Joint Venture of ET Rover Pipeline LLC, and non- affiliated company, AE-MidCo Rover, LLC