

Permit Renewal & Amendment Source Analysis & Technical Review

Company	Sunoco Partners Marketing & Terminals L.P.	Permit Number	1980, 56508, PSDTX1444M1, PSDTX1472M1 and GHGPSDTX191
City	Nederland	Project Numbers	293137 and 296887
County	Jefferson	Regulated Entity Number	RN100214626
Project Types	Amendment (Permit 56508 and Amendment-Renewal (Permit 1980))	Customer Reference Number	CN601403199
Project Reviewer	Miranda Duncan		
Site Name	Sunoco Partners Nederland Terminal		

Project Overview

Sunoco Partners Marketing & Terminals L.P.'s (SPM&T) Nederland Terminal is comprised of a marine loading facility and two tank farms. The site is concurrently authorized by Permits 1980 and 56508. SPM&T proposes to construct storage tanks, increase product throughput, and make several updates to calculations and authorized activities at the site. Specific project details can be found in the project description below.

Referred to as the main and south tank farm, the two tanks farms are physically separated by a public highway. The main tank farm is collocated with the marine loading facility. Land usages surrounding the site is a combination of residential and commercial properties. The planned area for the south tank farm is less than 0.25 miles from the main tank farm and loading facility.

Permit 1980 and 56508 projects are considered aggregated for modeling and federal applicability. With the updates being proposed, these projects will constitute a major modification for VOC, SO₂, H₂S and greenhouse gas (CO_{2e}). Per Texas Administrative Code (TAC) §116.160 and §116.164, VOC, SO₂, H₂S, greenhouse gases were evaluated and found to exceed the threshold in §116.164. Therefore, the Prevention of Significant Deterioration (PSD) review is required for VOC, SO₂, H₂S and CO_{2e}. For more information, please the Federal Applicability section.

Emission Summary

Air Contaminant	Current Allowable Emission Rates ^[1] (tpy)	Allowable Emission Rate Authorized by consolidated PBRs and NSR (tpy)	Permit 56508 Proposed Allowable Emission Rates(tpy)	Permit 1980 Proposed Allowable Emission Rates (tpy)	Change in Allowable Emission Rates (tpy)	Project Changes at Major Sources (Baseline Actual to Allowable) ^[2]	Net emission increase (tpy)
PM	0.77	--	5.24	0.04	4.51	5.28	5.28
PM ₁₀	0.77	--	5.24	0.04	4.51	5.28	5.28
PM _{2.5}	0.77	--	5.24	0.04	4.51	5.28	5.28
VOC	710.53	0.79	96.16	740.02	126.44	836.18	618.88
NO _x	8.00	--	38.33 ^[3]	0.72	31.05	39.05	39.05
CO	16.20	--	18.17	2.85	4.82	21.02	21.02
SO ₂	34.33	--	636.66	1.19	603.52	637.85	588.45
H ₂ S	0.31	0.01	0.58	28.79	29.07	29.37	29.37
GHG Pollutants							
CO ₂	--		116,267.00		116,267.00		98,623.46
CH ₄	--		6.27		6.27		6.27
N ₂ O	--		0.93		0.93		0.93
CO _{2e}	--		116,375.00		116,375.00		98,630.46

^[1] Summation of Permit 1980 and 56508 current authorized emissions rates.

^[2] Baseline emissions are conservatively represented as zero.

^[3] MVCU1-A and MVCU-1 operate asynchronous; therefore, emissions are counted once.

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Compliance History Evaluation - 30 TAC Chapter 60 Rules

A compliance history report was reviewed on:	February 28, 2020
Site rating & classification:	11.26 / Satisfactory
Company rating & classification:	6.20 / Satisfactory
Has the permit changed on the basis of the compliance history or rating?	No

Public Notice Information - 30 TAC Chapter 39 Rules

Rule Citation	Requirement	Renewal	Amendment
39.403	Is Public Notice Required?	Yes	Yes
	Date Application Received:	November 13, 2018	November 13, 2018 and February 19, 2019 ^[1]
	Date Administratively Complete:	December 3, 2018	December 3, 2018 and March 4, 2019 ^[1]
	Small Business Source?		No
	Date Leg Letters mailed:	December 3, 2018	December 3, 2018 and March 4, 2019 ^[1]
39.603	Date Published:	December 8, 2018	December 8, 2020 and March 9, 2019 ^[1]
	Publication Name:	<i>The Port Arthur News</i>	<i>The Port Arthur News</i>
	Pollutants:	Carbon monoxide, hazardous air pollutants, hydrogen sulfide, nitrogen oxides, organic compounds, particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less, and sulfur dioxide	Carbon monoxide, hazardous air pollutants, hydrogen sulfide, nitrogen oxides, organic compounds, particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less, sulfur dioxide and greenhouse gases
	Date Affidavits/Copies Received:	December 19, 2018	December 19, 2018 and March 13, 2019 ^[1]
	Is bilingual notice required?	Yes	Yes
	Language:	Spanish	Spanish
	Date Published:	December 9, 2018	December 9, 2018 and March 10, 2019 ^[1]
	Publication Name:	<i>El Perico</i>	<i>El Perico</i>
	Date Affidavits/Copies Received:	December 19, 2018	December 19, 2020 and March 13, 2019 ^[1]

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	Date Certification of Sign Posting / Application Availability Received:	March 14, 2019	March 14, 2019 and March 18, 2019
39.604	Public Comments Received?	No	Yes
	Hearing Requested?	No	Yes ^[1]
	Meeting Request?	No	No
	Date Response to Comments sent to OCC:	N/A	July 2, 2020
	Consideration of Comments:	No	No
	Is 2nd Public Notice required?	No	Yes
39.419	If no, give reason:	Renewals with no increases, no new contaminants, and a satisfactory compliance history do not require 2nd Public Notice as per 30 TAC 39.419(e)(1). N/A	
39.602(c)	Date SB 709 Legislative Notification Sent:	December 5, 2019 and March 3, 2020	December 5, 2019 and March 13, 2020
39.419	Date 2nd Public Notice/Preliminary Decision Letter Mailed:	N/A	March 30, 2020
39.413	Date Cnty Judge, Mayor, and COG letters mailed:	N/A	N/A
	Date Federal Land Manager letter mailed:	N/A	N/A
39.605	Date affected states letter mailed:	N/A	N/A
39.603	Date Published:	N/A	April 5, 2020
	Publication Name:	N/A	Beaumont Enterprise
	Pollutants:	N/A	Carbon monoxide, hydrogen sulfide, nitrogen oxides, organic compounds, particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less, sulfur dioxide and greenhouse gases
	Date Affidavits/Copies Received:	N/A	April 23, 2020
	Is bilingual notice required?	N/A	Yes
	Language:	N/A	Spanish
	Date Published:	N/A	April 5, 2020
	Publication Name:	N/A	El Perico
	Date Affidavits/Copies Received:	N/A	April 23, 2020
	Date Certification of Sign Posting / Application Availability Received:	N/A	May 14, 2020
	Public Comments Received?	N/A	No
	Meeting Request?	N/A	No
	Date Meeting Held:	N/A	N/A
	Hearing Request?	N/A	Yes ^[1]

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	Date Hearing Held:	N/A	N/A
	Request(s) withdrawn?	N/A	Yes
	Date Withdrawn:	N/A	December 4, 2019, December 9, 2019
	Consideration of Comments:	N/A	N/A
39.421	Date RTC, Technical Review & Draft Permit Conditions sent to OCC:	N/A	July 2, 2020
	Request for Reconsideration Received?	N/A	No
	Final Action:	N/A	Issuance
	Are letters Enclosed?	N/A	Yes

Renewal Requirements - 30 TAC Chapter 116 Rules

Rule Citation	Requirement	
116.315(a)	Date of permit expiration:	November 10, 2018
116.310	Date written notice of review was mailed:	July 25, 2017
116.315(a)	Date application for Renewal (PI-1R) received:	November 13, 2018; post marked November 8, 2018, prior to expiration date
116.311(a)(1)	Do dockside vessel emissions associated with the facility comply with all regulations?	Yes; Permit 56508 only.
116.311(a)(2)	Is the facility being operated in accordance with all requirements and conditions of the existing permit, including representations in the application for permit to construct and subsequent amendments, and any previously granted renewal, unless otherwise authorized for a qualified facility?	Yes
	If no, explain:	N/A
116.311(a)(3)	Subject to NSPS?	Yes
	Subparts A, K, Ka & Kb	
116.311(a)(4)	Subject to NESHAPS?	No
	Subparts	N/A
116.311(a)(5)	Subject to NESHAPS (MACT) for source categories?	No
	Subparts	N/A
116.311(a)(6)	Does this project require case-by-case MACT?	No
116.311(b)	Was there a condition of air pollution that had to be addressed during this project review?	No
	If yes, explain:	N/A
116.314(a)	Does the facility meet all permit renewal requirements?	Yes
116.313	Permit Renewal Fee: \$ 10,000 Fee certification: M9055129B	
	Applicable Outstanding Fees: N/A	

Amendment Requirements^[3] - 30 TAC Chapter 116 Rules

Rule Citation	Requirement	
116.111(a)(2)(G)	Is the facility expected to perform as represented in the application?	Yes
116.111(a)(2)(A)(i)	Are emissions from this facility expected to comply with all TCEQ air quality Rules & Regulations, and the intent of the Texas Clean Air Act?	Yes

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116.111(a)(2)(B)	Emissions will be measured using the following method:	Engineering calculations and sampling																																																		
	Comments on emission verification:	No																																																		
116.111(a)(2)(D)	Subject to NSPS? ^[2]	Yes																																																		
	Subparts A, K, Ka & Ka																																																			
116.111(a)(2)(E)	Subject to NESHAP? ^[1]	Yes																																																		
	Subparts A & Y																																																			
116.111(a)(2)(F)	Subject to NESHAP (MACT) for source categories?	No																																																		
	Subparts	N/A																																																		
116.111(a)(2)(H)	Nonattainment review applicability: The site is located in Nederland County, an attainment county. A nonattainment review is not required.																																																			
116.111(a)(2)(I)	PSD review applicability: The site is considered a named major source. The project is major for the following pollutants: VOC, SO ₂ , H ₂ S, and GHG pollutants; PSD review is applicable as demonstrated in the table below:																																																			
	<table><tr><th></th><th>VOC (tpy)</th><th>NO_x (tpy)</th><th>CO (tpy)</th><th>PM (tpy)</th><th>PM₁₀ (tpy)</th><th>PM_{2.5} (tpy)</th><th>SO₂ (tpy)</th><th>H₂S (tpy)</th><th>GHGs (tpy)</th></tr><tr><td>Project Increases</td><td>836.18</td><td>39.05</td><td>21.02</td><td>5.28</td><td>5.28</td><td>5.28</td><td>637.85</td><td>29.37</td><td>116,375.00</td></tr><tr><td>PSD Threshold</td><td>40</td><td>40</td><td>100</td><td>25</td><td>15</td><td>10</td><td>40</td><td>10</td><td>75,000</td></tr><tr><td>Increases after Netting</td><td>618.88</td><td>39.05</td><td>21.02</td><td>5.28</td><td>5.28</td><td>5.28</td><td>588.45</td><td>29.37</td><td>98,630.46</td></tr><tr><td>PSD review Required</td><td>Yes</td><td>No</td><td>No</td><td>No</td><td>No</td><td>No</td><td>Yes</td><td>Yes</td><td>Yes</td></tr></table>		VOC (tpy)	NO _x (tpy)	CO (tpy)	PM (tpy)	PM ₁₀ (tpy)	PM _{2.5} (tpy)	SO ₂ (tpy)	H ₂ S (tpy)	GHGs (tpy)	Project Increases	836.18	39.05	21.02	5.28	5.28	5.28	637.85	29.37	116,375.00	PSD Threshold	40	40	100	25	15	10	40	10	75,000	Increases after Netting	618.88	39.05	21.02	5.28	5.28	5.28	588.45	29.37	98,630.46	PSD review Required	Yes	No	No	No	No	No	Yes	Yes	Yes	
	VOC (tpy)	NO _x (tpy)	CO (tpy)	PM (tpy)	PM ₁₀ (tpy)	PM _{2.5} (tpy)	SO ₂ (tpy)	H ₂ S (tpy)	GHGs (tpy)																																											
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PSD review Required	Yes	No	No	No	No	No	Yes	Yes	Yes																																											
116.111(a)(2)(L)	Is Mass Emissions Cap and Trade applicable to the new or modified facilities?	No																																																		
	If yes, did the proposed facility, group of facilities, or account obtain allowances to operate:	N/A																																																		
116.140 - 141	Permit Fee: \$ 75,000 ^[3]	Fee certification: M9055129B and M915494																																																		

[1] Affect Permit 56508 only.

[2] Affect Permit 1980 only.

[3] Affect Permits 1980 and 56508 individually.

Title V Applicability - 30 TAC Chapter 122 Rules

Rule Citation	Requirement
122.10(13)	Title V applicability: The site is a major source subject to the Title V program. Site Operating Permit O-1573 is associated to marine loading facility (NSR Project 1980) and tank farm (NSR Permit 56508).

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122.602	<p>Periodic Monitoring (PM) applicability: SPM&T is subject to 30 TAC §122; therefore, the site will comply with the following PM:</p> <p>Permit 56508</p> <ul style="list-style-type: none"> • Marine loading line and connectors' inspection (SC 8), • Annual marine vessel annual vapor tightness test (SC 9.A), • Perform audio, olfactory and visual (AVO) checks every 8-hours during marine vessel loading (SC 9.D), • Monthly marine loading emission recordkeeping required (SC 13), and • 28-VHP Leak Detection and Repair (LDAR) program management required (SC 15). <p>Permit 1980</p> <ul style="list-style-type: none"> • Maintain monthly tank throughput records on a rolling 24-month basis (SC 10), • Evaluate crude oil dissolved H₂S either annual or within in 60 days of receiving (SC 11), and 28-VHP LDAR program management required (SC 12).
122.604	<p>Compliance Assurance Monitoring (CAM) applicability: SPM&T is subject to 30 TAC §122; therefore, the site will comply with CAM for VCUs. An initial stack testing is required within 60-days after achieving maximum operation. Temperature monitoring and waste stream flow monitoring is required but bypass valves are prohibited on the MVCUs. Bypass language is listed as Permit 1980's SC 13 for EPN COMBUST. Capture system piping connectors are subject to an AVO inspection at least weekly per 28VHP.</p>

Request for Comments

Received From	Program/Area Name	Reviewed By/Date	Comments
Region:	10	N/A	N/A
City:	Nederland	N/A	N/A
County:	Jefferson	N/A	N/A
ADMT:	Air Permits	Justin Cherry	Model acceptable
EB&T:	N/A		
Toxicology:	Toxicology, Risk Assessment and Research	Stanley Aniagu	Impacts acceptable
Compliance:	N/A		
Legal:	N/A		
Comment resolution and/or unresolved issues:	None		

Process/Project Description

The terminal receives material by railcar and pipeline. The material is stored in either an internal (IFR) or external (EFR) floating roof storage tanks. The storage tank emissions are authorized on Permit 1980. As required, the material is loaded into marine vessels. The material may be loaded into either a non-inert (vacuum barges) or inert (ocean-going barges and ships) marine vessel. Loading of materials with a TVP greater than 0.5 pounds of square inch (psia) is controlled via one of the 13 VCUs. Marine loading facilities are authorized on Permit 56508.

The storage tanks' degassing (EPN DEGAS) emissions are routed to a portable VCU (EPN COMBUST). Upon reaching the 10,000 parts per million by volume (ppmv) of VOC, the tank is vented to the atmosphere (EPN DEGAS) and may stand idle (EPN ROOFLAND).

Permit 1980 authorizes all main and south tank farms and associated maintenance activities. SPM&T seeks to obtain authorization for the following:

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- (1) Renewal of the storage tanks and maintenance activities,
- (2) Construction of 13 new floating roof storage tanks and update naming conventions,
- (3) Speciate tank maintenance to include emissions from:
 - a. Roof landing,
 - b. Degassing, and
 - c. Idle standing.
- (4) Represent individual tank hourly emissions,
- (5) Incorporate by reference Permit by Rule (PBR) 118730 and unregistered PBR 106.183 for railroad car heaters.

Permit 56508 authorizes marine loading activities. SPM&T seeks to obtain authorization for the following:

- (1) Authorize additional loading docks and vapor combustion units (VCU),
- (2) Update marine loading docks' naming conventions,
- (3) Authorize an increase in materials throughput and remove cyclohexane and lube oil.
- (4) Increase marine loading annual average true vapor pressure (TVP) and crude oil dissolved hydrogen sulfide (H₂S),
- (5) Correct crude oil marine loading calculation representations,
- (6) Increase inert ocean-going ships' capture efficiency to 99.9-percent, and
- (7) Incorporate by consolidation New Source Permit 5691 and unregistered 106.261 for loading dock fugitives.

Permit 5691's facilities to be incorporated and be renewed concurrently as Permit 56508. No impact on facilities authorizations.

Project Scope

Permit 56508's Special Conditions Updates

Original Condition No.	Draft Condition No.	Changes
-	2	Allows SPM&T to access the federal oil reserves, if requested from government officials, without penalty from not complying with TCEQ conditions and MAERT
3	4	Removed VCU effective date provision. The site has completed VCU construction and fulfill provision compliance.
4	5	Update application submittal date.
8	10	Updated marine loading to include audio, olfactory and visual (AVO) recordkeeping requirements.
11	10	Added barge dock E and ship docks 5 and 7.
11A	10A	Added MVCU1-A. Please note that MVCU1-A and MVCU-1 operate asynchronously.
12	11	Listed authorized marine loading docks for fuel oil (TVP equal or less than 0.50 psia).
13	12	Update application submittal date.
15 & 15E	14 & 14E	Added MVCU 1-A to the operational requirements.
17 and 17B	16 and 16B	Added MVCU-1A to initial demonstration requirements.
-	17	Greenhouse gas emission recordkeeping added.
MAERT footnote 6 and 7	-	Footnote 6 was replaced to clarify VCU fugitive component authorization. Footnote 7 associated with the VCU construction deadline requirement. The site fulfilled deadline and footnote no longer required.

Permit 1980's Special Conditions

Item #	Original Condition No.	Draft Condition No.	Changes
1	--	3	Allows SPM&T to access the federal oil reserves, if requested from government officials, without penalty from not complying with TCEQ conditions and MAERT.

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2	3	4	Updated federal applicability requirements and format.
3	5 & 6	6 & 7	Updated storage tanks' list.
4	7	8	Increased combined maximum throughputs of each material.
5	8	9	Updated application representations.
6	--	11	Required crude oil dissolved H ₂ S testing.
7	12	14	Increased portable VCU destruction efficiency from 98 to 99.5-percent.
8	15	17	Updated storage tanks' list.
9	19, 20, 21, 22 & 23	21, 22, 23, 24 & 25	Increase VCU destruction efficiency.
10	25.E	27.E	Increase VCU destruction efficiency.
11	--	Att. A	Added MSS activity summary.

Best Available Control Technology

Source Name	Permit	EPN	Best Available Control Technology Description
Storage tanks - IFR	1980	[1]	The site will store material with a true vapor pressure (TVP) less than 11.0 pounds per inch atmosphere (psia). The material will be filled via submerge fill. IFR storage tanks are equipped with white uninsulated exterior, and mechanical or liquid primary seal. EPNs 1600-1601 and 1608-1615 will be constructed with drain-dry.
Storage tanks – EFR	1980	[2]	The site will store material with a TVP less than 11.0 psia. The material will be filled via submerge fill. EFR storage tanks are equipped with white uninsulated exterior and mechanical or liquid mounted seal with a rim mounted secondary seal. EPNs 2018 A-C will be constructed with drain-dry.
Tank Standing Idle	1980	EPN DEGAS and EPN COMBUST	Limit one day for standing idle.
Tank Degassing-Atmospheric	1980		Upon 10,000 ppmw of VOC is met, emissions may be vented to atmosphere. Maximum of 4 hours per event. Only one uncontrolled degassing can occur in any given hour.
Tank Landing-Controlled	1980	EPN ROOFLAND	Route to the portable vapor combustor unit until the 10,000 ppmw of VOC is met. Only one controlled degassing/refilling event can occur in any given hour.
Tank Refilling	1980	EPN COMBUST	Route to the portable vapor combustor unit. Limited 6,000 bbls/hr. Only one controlled degassing/refilling event can occur in any given hour.

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Inert Marine Vessel Loading	56508	All EPNs listed as MVCU-FUG, LOADBD, and LOADSD.	Inert marine vessels meet minimum 99.9-percent collection efficiency. The marine loading emissions are routed to one of the 13 VCUs if material with a TVP is equal or greater than 0.5 psia. Emission calculations at the 13 VCUs assume up to 100% of the loading vapors are collected. Emissions generated from loading material with a TVP less than or equal to 0.5 psia are authorized under EPNs LOADBD and LOADSD and are not sent to control.
Vacuum Marine Vessel Loading	56508	All EPNs listed as MVCU	Vacuum loaded marine vessels meet 100-percent collection efficiency using a vacuum blower. The marine loading emissions are routed to one of the 13 VCU if material have a TVP equal or greater than 0.5 psia.
Portable Vapor Combustor	1980	EPN COMBUST	The portable vapor combustor is required to meet a minimum combustion chamber temperature and destruction efficiency of 99.5-percent for VOCs. Temperature is continuously monitored. An initial stack sampling is required upon maximum operation being met.
Vapor combustors	56508	All EPNs listed as MVCU and EPN COMBUSTCAP.	Each vapor combustion unit is required it meet a minimum combustion chamber temperature and destruction efficiency between 99.8 ^[3] -99.9-percent for VOCs. Temperature is continuously monitored. An initial stack sampling is required upon maximum operation being met.
Fugitives	1980 & 56508	All EPNS listed as F-TRML, LBD-FUG and LSD-FUG.	The site employs 28-VHP Leak Detection and Repair (LDAR).

[1] Includes storage tanks with EPNs 2102, 131, 133, 204, 205, 1521, 1533, 1534, 1555, 1557, 1574, 1575, 1600, 1601, 1602, 1603, 1604, 1605, 1606, 1607, 1608, 1609, 1610, 1611, 1612, 1613, 1614 and 1615.

[2] Includes storage tanks with EPNs 2101, 1522, 1523, 1524, 1525, 1526, 1527, 1529, 1530, 1531, 1532, 1537, 1538, 1539, 1540, 1541, 1542, 1543, 1544, 1545, 1546, 1547, 1548, 1549, 1550, 1551, 1552, 1553, 1554, 1556, 1558, 1559, 1560, 1561, 1562, 1563, 1564, 1565, 1566, 1567, 1568, 1569, 1570, 1571, 1572, 1573, 1576, 1577, 1578, 1579, 1580, 1581, 1582, 1583, 1584, 1585, 1586, 1587, 1588, 1589, 1590, 1591, 1592, 1593, 1594, 2015-J, 2051-M, 2015-N, 2015-O, 2015-Q, 2015-R, 2015-A, 2015-B and 2018-C.

[3] EPN MVCU 1 has a destruction efficiency of 99.8-percent whereas all others meet 99.9-percent destruction efficiency.

Impacts Evaluation - 30 TAC 116.111(a)(2)(J)

Was modeling conducted?	Yes	Type of Modeling:	AERMOD
Will GLC of any air contaminant cause violation of NAAQS?	No		
Is this a sensitive location with respect to nuisance?	No		
[§116.111(a)(2)(A)(ii)] Is the site within 3000 feet of any school?	Yes		
Additional site/land use information: The uses of area surrounding the site is a combination of non-industrial and industrial. A public highway separates the main and south tank farms. A residential area immediate borders the southeast property.			

Summary of Modeling Results

SPM&T performed sitewide modeling using AERMOD to determine if the site's health-effects and National Ambient Air Quality Standards (NAAQS) would be exceeded. A modeling audit was performed by the TCEQ Air Dispersion Modeling Team

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(ADMT) in the memorandum dated December 4, 2019. ADMT determined that the air quality analysis was acceptable for all pollutants. The Modeling and Effects Review Applicability (MERA) and NAAQS evaluations are as follows:

NAAQS and State Property Line Analyses:

Motiva evaluated SO₂, PM₁₀, PM_{2.5}, NO₂ and CO for NAAQS and SO₂ and H₂S for state property line standards. The company assesses NAAQS requirements using AERMOD. SO₂ and PM₁₀ were evaluated full NAAQS sitewide modeling and did not exceed increment concentration. PM₁₀, PM_{2.5}, NO₂ and CO did not exceed NAAQS de-minimis.

MERA Analysis:

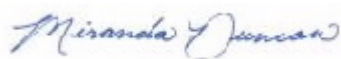
Sunoco evaluated 4 chemicals using the TCEQ MERA guidance. Crude, fuel oil, condensate and naphtha were evaluated for health impacts at their maximum potential to emit. Fuel oil hourly emissions met the ratio test threshold and satisfy step 6 of the MERA. Emissions of crude oil, condensate and naphtha were evaluated and exceeded de-minimis thresholds and site-wide modeling was conducted. The site took several operational limitations to achieve acceptable impacts including:

- Uncontrolled degassing shall be limited to 960 hours per year,
- Tank roof landing activities shall be limited to 20 tank refill/controlled degassing events per tank per year, and
- Landing activities shall be limited to 35 hours per event.

TD approved all exceedances via memorandum dated December 4, 2019. All compounds are approved for health effects. TCEQ does not expect adverse health effects to occur among the public from the exposure to the proposed emissions. Please see the modeling memo dated December 4, 2019 for additional information.

Permit Concurrence and Related Authorization Actions

Is the applicant in agreement with special conditions?	Yes
Company representative(s):	Celia Chu
Contacted Via:	Email
Date of contact:	02/27/2020
Other permit(s) or permits by rule affected by this action:	NSR Permit 5691
List permit and/or PBR number(s) and actions required or taken:	Consolidate and void Permit 5691 upon approval



June 26, 2020



July 7, 2020

Project Reviewer
Miranda Duncan

Date

Team Leader
Ryan Tedford

Date