CITY OF PHILADELPHIA Department of Public Health Environmental Protection Division Air Management Services

Plain Language Summary for Evergreen Resources Group, LLC, Initial Natural Minor Operating Permit (NMOP) Summary for OP17-000056, PLID 10479

Evergreen Resource Group, LLC submitted an initial NMOP Application (OP17-000056) to AMS for the ongoing operation of existing remediation systems at the Philadelphia Energy Solutions Refining and Marketing LLC (PES) - Philadelphia Refining Complex (3144 W. Passyunk Avenue, Philadelphia, PA 19145) and Sunoco Belmont Partners Marketing and Terminals L.P. (SPMT) (2700 W. Passyunk Avenue, Philadelphia, PA 19145). A NMOP is a type of air pollution permit that allows the facility to operating processes that emit air pollution at a facility that is considered a minor source of air pollution by EPA. This document summarizes the sources that will operate under NMOP OP17-000056 and the NMOP requirements. This proposed NMOP does not include any proposed new processes or any refining processes.

Evergreen is currently responsible for the operation of the following three (3) remediation systems that remove materials such as oil and gasoline that have seeped into the ground and groundwater during the many years the refinery and gasoline terminal operated:

- Point Breeze Remediation System located at the Former PES Terminal Site
- Belmont Terminal Remediation System and Holding Tank located at the Belmont Terminal Site
- Maiden Lane Remediation System Former PES Terminal Site (Northern Border of Point Breeze Refinery)

These processes are required to have an air pollution permit because they can emit Volatile Organic Compounds (VOCs), which contribute to smog, and hazardous Air Pollutants like benzene that can be harmful to public health. Each must operate with an air pollution control device that reduces emissions.

Point Breeze Remediation System – located at the Former PES Terminal Site

This unit was originally issued an installation permit in 1998 that allowed it to be installed. Emissions from the unit must pass through a biofilter prior to being emitted into the atmosphere. The biofilter contains microbes which destroy most of the pollutants before they are emitted. The original installation permit did not include any emission limits for the unit, but periodic testing has consistently shown emissions of 0 ppm. The facility is required to periodically monitor and record various parameters to make sure the biofilter is working proposer, such as weekly monitoring of the steam injection system.

<u>Belmont Terminal Remediation System and Holding Tank – located at the Belmont Terminal</u> <u>Site</u>

This unit was originally issued an installation permit in 2001 that allowed it to be installed. Emissions from this unit must also pass through a biofilter which controls most of the emissions and prevent sewer odors (Shunk Avenue Sewer). The original installation permit did not include any emission limits for the unit, but recent testing has consistently shown emissions of 0 ppm. The facility is required to periodically monitor and record various parameters to make sure the biofilter is working proposer, such as weekly treatment bed temperatures and influent pressure.

<u>Maiden Lane Remediation System – Former PES Terminal Site (Northern Border of Point</u> <u>Breeze Refinery)</u>

This is a newer unit was issued an installation permit in 2021 that allowed it to be installed. Emissions from this unit must pass through a catalytic oxidizer which burns up most of the emissions It has the following emission limits:

- Actual VOC emissions from the closed-vent system shall be less than 0.5 tons per rolling 12-month period. (EPA considers a facility in Philadelphia major if VOC emissions are 25 tons per year or greater.)
- Actual HAP emissions from the closed-vent system shall be less than 0.5 tons per rolling 12-month period. (EPA considers a facility major if emissions of a single HAP like benzene are 10 tons per year or greater or if the emissions of all HAPs combined are 25 tons per year or greater.)
- VOC emissions shall not exceed 200 ppm or the catalytic oxidizer must reduce the by 99%.

The facility must operate the catalytic oxidizer at certain temperatures to make sure it works effectively. They must monitor VOC and HA emissions monthly to make sure they are below emission limits. Monitoring results in 2021 show VOC and HAP emissions are negligible or zero.