



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Mr. Ron Rosendorn
Energy Transfer Marketing & Terminals
1240 Crown Point Road
Westville, New Jersey 08093

04/28/2022

Dear Mr. Rosendorn:

I am writing in response to your request of April 14, 2022, and the additional information provided on April 26, 2022, in which you seek to use an alternative test method on Marine Vapor Combustion Unit No. 3 (MVCU #3) at Energy Transfer Marketing & Terminals' Eagle Point Tank Farm and Dock located at 1240 Crown Point Road, Westville, Gloucester County, New Jersey. According to the information provided, the MVCU #3 is subject to the testing requirements of 40 CFR part 63, Subpart Y, National Emission Standards for Marine Tank Vessel Loading Operations (Subpart Y). The Office of Air Quality Planning and Standards, as the delegated authority, must make the determination on any major alternatives to test methods and procedures required under 40 CFR parts 59, 60, 61, 63, and 65. Your proposed alternative test method and our approval decisions are discussed below.

According to the information you provided, the MVCU #3 is subject to the flow testing requirements found in 40 CFR 63.565(d)(3)(iii), which states:

"The volume exhausted shall be determined using Method 2, 2A, 2C, or 2D of appendix A of part 60 of this chapter, as appropriate."

You are seeking approval to use Method 2B (40 CFR part 60, Appendix A) in lieu of the flow test methods specified by 40 CFR 63.565(d)(3)(iii). As detailed in your request, you seek this alternative because of the safety concerns associated with performing a flow traverse on the stack of MVCU #3. According to your letter, not only is the exhaust temperature between 800°F and 1200°F, but flame overs can occasionally occur making it extremely dangerous for personnel to be on or near the stack exit while the unit is in operation.

After reviewing the information contained in your request, and taking into account the safety concerns you detail and the fact that Method 2B is allowed for use on similar units under 40 CFR part 60, Subpart XX, Standards of Performance for Bulk Gasoline Terminals, we are approving the use of Method 2B to determine the flowrate on MVCU #3 at Energy Transfer Marketing & Terminals' Eagle Point Tank Farm and Dock.

Please note that a copy of this determination must be included in all test reports that use this alternative method.

Because this alternative method may be of use to others, we feel that it is reasonable that this approval be broadly applicable to all units subject to the flow test method requirements found in 40 CFR 63.565(d)(3)(iii). For this reason, we will post this letter as ALT-148 on our website at <https://www.epa.gov/emc/broadly-applicable-approved-alternative-test-methods> for use by other interested parties.

If you have any questions regarding this determination, please contact Kim Garnett of my staff at 919-541-1158 or garnett.kim@epa.gov.

Sincerely,

Steffan M. Johnson
Group Leader
Measurement Technology Group

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