

Q&A REGARDING HILCO REDEVELOPMENT PARTNERS' REQUEST FOR MODIFICATIONS OF TITLE V (AIR) PERMITS

Q. What is Air Management Services' (AMS)?

A. Air Management Services (AMS) is a government agency that has authority from the U.S. Environmental Protection Agency (USEPA) to issue air operating permits, sometimes referred to as Title V permits.

Q: What is a Title V Operating Permit, exactly, and why are they relevant for The Bellwether District?

A. Title V operating permits regulate air emissions. At the former Philadelphia Energy Solutions (PES) refinery these permits regulated air emissions from a range of possible sources, including refinery operations to tanks. The modified permits will regulate the demolition activity at the site.

Currently there are two Title V permits in place at The Bellwether District: one for the former refinery, and one for the Schuylkill River Tank Farm (SRTF).

Q. Why is HRP seeking modifications to these permits?

A. The Title V permits were put in place years ago to monitor emissions sources from the former refinery when it was active. As you know, the refinery was shut down in August of 2019 and work began in July of 2020 to decommission and demolish the former refinery. This work is ongoing and is anticipated to be complete by 2024. Because of the decommissioning and demolition work that has happened over the last year plus, some of the sources of emissions have been eliminated, so HRP is asking for the permit to be modified to account for this progress. It's important to note that HRP is **not** requesting a new permit for new sources, but a modification to the existing permit *to account for the reduction of emission sources*. HRP is simply trying to right size the existing permits to the right parties and to the current conditions on site.

Q. If you will never be operating a tank farm, why do you need the tank farm permit modified?

A. It's important to note that HRP is not requesting a new permit. Rather, HRP is requesting the modification of an existing permit. The tank farm is not operational, but the tank farm infrastructure is still place. Therefore, a permit is necessary and HRP is required to comply with regulations as laid out in the Title V permit.

Q. How far along is demolition & decommissioning?

A. Decommissioning and demolition started immediately following HRP's purchase of the facility on June 26, 2020 and work has been ongoing since then.

To prepare for demolition, work has focused on two key activities:

1. **Decommissioning**, which includes removing petroleum product and disconnecting utility systems, and,
2. **Asbestos abatement** sitewide.

To date, 99% of legacy petroleum product has been removed. The remaining petroleum product has been consolidated into one tank at the former refinery and will be shipped offsite within the next few months. The asbestos abatement is nearly complete with minor building-related abatement remaining.

The demolition of the site started in the north and is progressing to the southern tip of the property. **The demolition is 45% complete sitewide** with over 60 tanks demolished and demolition started within all process units that previously sat in the Point Breeze area of the facility, including the demolition of the unit that was part of the June 2019 incident. Demolition has also started within the previous Girard Point area. This demolition activity has already cleared the skyline in the northern portion of the site.

Q. What happens if these permit modifications are not granted?

A. If the permits are not modified, the current permits, which were put in place to govern an active refinery and tank farm, would remain in place.