



# HRP

## Public Informational Meeting: Title V (Air) Permits Proposed Modifications

**September 1, 2021**

# PANELISTS



**Jasmine  
Sessoms**  
HRP  
SVP Corporate  
Affairs



**Julianna  
Connolly**  
HRP  
EVP Environmental



**Stephanie  
Eggert**  
HRP  
SVP Operations



**Ed Wiener**  
AMS  
Chief of Source  
Registration



**Gary Bowman**  
NorthStar  
President



**Abdul  
Bamgbose**  
T. Parker Host  
Facility Engineer



**Chris Holt**  
T. Parker Host  
Director, EH&S



**Rahel  
Gebrekidan**  
AMS  
Engineering  
Supervisor

# AGENDA

- Purpose of Meeting
- Introduction to HRP
- Facility Update
  - Project Team (PESRM, NorthStar & Host)
  - Decommissioning & Demolition Update
  - Development Update
- Air Permitting Overview
- Summary of Proposed Modifications
- Summary of Next Steps

# PURPOSE OF TODAY'S MEETING

- Per AMS's Environmental Justice policy, PESRM will provide an update on the air permits at the former PES refinery facility and proposed modifications that will reduce the amount of possible air pollution sources.
- AMS's Environmental Justice policy applies to certain air permits, including Title V permits, and generally requires that citizens are given an opportunity to learn about air permitting applications in areas of concern in the Philadelphia area before the formal review and comment period.
- Additional information on Environmental Justice is available on the City's website at [https://www.phila.gov/media/20181213131519/Environmental\\_Justice\\_Brochure.pdf](https://www.phila.gov/media/20181213131519/Environmental_Justice_Brochure.pdf)

# HRP CORE PILLARS



Hilco Redevelopment Partners is in the **business of transformation, setting the new standard of sustainable redevelopment**. We prioritize best-in-class environmentalism, community engagement and local economic development

## ENVIRONMENT

We remediate each site to the highest environmental standards and recycle nearly 100% of old materials in coordination with local officials to reduce our environmental footprint

## ECONOMY

HRP helps communities reinvigorate themselves by bringing new jobs and revenue to properties that have decayed over decades.

## COMMUNITY

We are good neighbors, working closely with city leaders and residents to make each site responsive to the needs of residents and authentic to the city while respecting its history

# DEMOLITION & DECOMMISSIONING

- Four-year demolition and decommissioning project is progressing as planned and on schedule
  - Commenced summer of 2020
  - Progressing from north to south in phases
  - The first phase is substantially complete
- Decommissioning, tank and pipe preparation approximately **90%** complete
- Approximately **95%** complete on tank product removal which includes hydrocarbons, residual fuels, slop oil, etc.
- Asbestos abatement is approximately **85%** complete; no safety or compliance issues
- Approximately **30%** complete on sitewide demolition activity
- All work taking place on site is currently exceeding the hiring goals established in our executed Economic Opportunity Plan
  - Demolition progress:
    - 105 buildings started in 4Q 2020
    - 3,000 tanks/vessels started in December 2020
    - 23 process units started in May 2021
    - Two boiler houses have been shutdown
    - Two WWTPs remain operational during transition





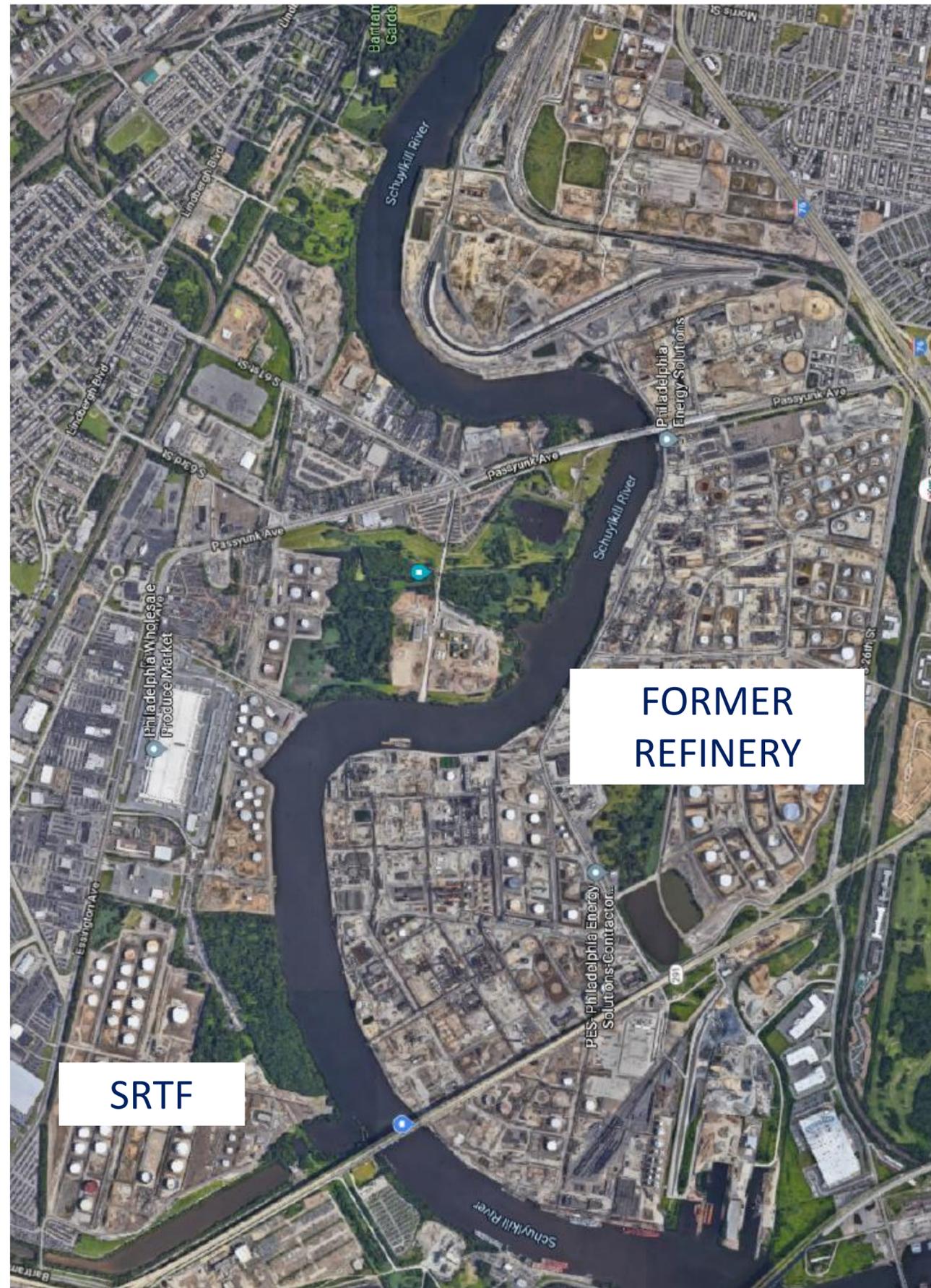
- Master plan continuing to be developed
  - Market considerations for different types of uses such as life sciences, manufacturing, cold storage, last mile, distribution, e-commerce, etc.
  - Target updated Master Plan for Fall of this year
- Overall Development Phasing
  - Continue to work generally north to south following demolition progress

# OVERVIEW OF SITE

- HRP Philadelphia Holdings, LLC acquired PES Holdings, LLC, in a membership interest purchase on June 26, 2020. Philadelphia Energy Solutions & Marketing LLC (PESRM) is a wholly owned subsidiary of PES Holdings, LLC.
- The site has already been subject to two Title V air permits that govern air emissions from most of the equipment on-site.
- Permit modifications are requested because the refinery was permanently shut down in 2019, and most of the site is now undergoing demolition for redevelopment.
  - Air permits were originally issued for an active refinery, now 70% of sources are permanently shutdown which equates to 92% of the 2017-2018 average criteria pollutant emissions; that number will continue to increase as demo work is completed.
  - The facility must continue to operate some equipment for the demolition process, including some flares and wastewater treatment plants. PESRM is legally required to maintain an operating permit while there are remaining air pollution sources – permits will be modified for these uses.
  - The modifications are needed to align with current demolition and will remain environmentally protective and subject to AMS oversight.

# TITLE V PERMIT: PERMIT OVERVIEW

- Air quality is governed in Philadelphia by an agency called Air Management Services (AMS).
- The site and thus Title V permitting is split into two segments, 1) The Former Refinery and 2) Schuylkill River Tank Farm.
  - HRP has contracted with Host at Philadelphia, LLC (Host) to provide terminal operation services for SRTF, Girard Point Docks, Point Breeze Docks, the North and South Rail Yards, and pipelines owned by PESRM.
  - PESRM expects to decommission and demolish the remaining equipment formerly used for refinery processes, which is generally on the east side of the Schuylkill River. HRP has retained NorthStar to perform the decommissioning and demolition of the former refinery complex.



# TITLE V PERMIT #1: FORMER REFINERY

- The facility operator is now NorthStar Contracting Group, Inc. (NorthStar), the company hired to decommission and demolish the refining equipment at the former refinery.
- AMS administratively amended the former refinery Title V permit on April 15, 2021 to update the facility operator from PESRM to NorthStar.
- PESRM submitted an application to AMS to modify its existing Title V permit in October 2020.
  - The application included proposed changes to reflect the current operations:
    - No petroleum refining is or will ever occur at the facility
    - Active demolition activities are on-going.

# TITLE V PERMIT #1 (Continued): FORMER REFINERY



- Summary of proposed changes to the Former Refinery Title V permit
  - Changing the Standard Industrial Classification (SIC) Code for the facility from 2911 (Petroleum Refining) to 1795 (Wrecking and Demolition Work) because there is no longer any refining at the facility.
  - Removing all shutdown equipment from the Title V permit. This includes all refining process equipment and boilers.
  - Removing all air pollution requirements that are no longer applicable to the facility due to the shutdown of processes sources and ceasing of refining operations.
  - Removing some storage tanks and a railcar loading/unloading process from the Title V permit. These units will be operated as part of by the adjacent tank farm and will be added to its Title V permit as part of a permit modification as set forth below.
  - Renew the Title V permit, as PESRM timely submitted a renewal application in January 2019. Administratively, AMS is processing the renewal and modification applications concurrently.

# TITLE V PERMIT #2: Schuylkill River Tank Farm (SRTF)

- SRTF is a tank farm west of the Schuylkill River that was operating as a commercial tank storage facility. Currently, the tank farm is in a nonoperational state.
- SRTF is owned by PESRM. There are no refining operations at the SRTF.
- PESRM has contracted with Host at Philadelphia, LLC (Host) to provide terminal operation services at the SRTF as well as at docks (the Girard Point and Point Breeze docks), railyards (the North and South Rail Yards), and certain tanks east of the Schuylkill River.
- PESRM submitted an application to AMS to modify its existing SRTF Title V permit in October 2020.
  - Proposed modification of the existing SRTF Title V will incorporate existing permits for the docks and railyards into the Title V. This will result in one Title V permit for all terminal operations.
  - SRTF is already subject to an in-force Title V permit, which was previously transferred to Host as operator via administrative amendment on April 15, 2021.
  - Currently, the docks and railyards are subject to the other Title V permit for the former refinery.

# TITLE V PERMIT MODIFICATIONS: PERMITTING PROCESS



- This informational meeting is being held as part of enhanced public participation consistent with the AMS Environmental Justice (EJ) policy.
- The next step is a Public Notice for the intent to issue the Title V permits that will be published in the ***Pennsylvania Bulletin*** and either ***Philadelphia Inquirer*** or ***Philadelphia Daily News*** as required by Pennsylvania regulations. Under the EJ policy it will also be published in a neighborhood newspaper. AMS will issue draft Title V permits for the public's review and comment along with a Plain Language Summary that explains these modifications.
- That will trigger a 30-day public comment period, where the public and EPA can submit comments on the draft Title V permits or request a public hearing. EPA has a 45-day comment period.
- AMS must hold a public hearing (if requested) and address comments received before issuing the final Title V permits.
- During the public comment period, copies of the applications, draft Title V permits, AMS's review memorandum, and the plain language document will be available for public review at Air Management Services, 321 University Ave, Philadelphia, PA 19104. The public will be able to arrange a visit by calling (215) 685-7572 (subject to COVID-19 restrictions that are subject to change). The documents will also be available at AMS's website at:  
<https://www.phila.gov/departments/air-pollution-control-board/air-management-notices/>



# THANK YOU

For additional information, please contact:  
Air Management Services, Ed Wiener  
HRP, Jasmine Sessoms

(215) 685-9426  
(215) 907-8345

[www.hrpphilly.com](http://www.hrpphilly.com)

Hilco Redevelopment Partners

@HRPPhilly

@hilco\_redev

