Operated by MPLX[1] – Wonsits Valley Compressor Station
Full Compliance Evaluation (FCE)
On-Site Inspection

Inspection Date:	September 17, 2024
Inspection Report Date:	October 8, 2024
EPA Representatives:	Colin LeCortz, Environmental Scientist, US EPA Region 8 Michael Stovern, Environmental Scientist, US EPA Region 8 Chris Andrade, US EPA Region 8 James Floyd, US EPA Region 8
Tribal Representatives:	Alverna Nelson Lonnie Favel
Company Representatives:	Joshua Hirschi AJ Thompson Jared Holmes Bill Allen Joe Lopez Chris Calvert David VanLeuben
Inspection Report Prepared By:	Colin LeCortz, Physical Scientist, US EPA Region 8
Inspection Report Reviewed By:	Scott Patefield, Manager, Enforcement and Compliance Assurance Division, Air and Toxics Enforcement Branch SCOTT PATEFIELD Digitally signed by SCOTT PATEFIELD Date: 2024.10.08 13:24:39 -06'00'
Last Inspection:	June 23, 2022
Operating Status:	Operating
Applicable Requirements:	Title V 40 CFR Part 60, Subpart JJJJ: Standards of Performance for New Stationary Sources (NSPS JJJJ) 40 CFR Part 63, Subpart ZZZZ: National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (MACT ZZZZ) 40 CFR Part 63, Subpart HH: National Emissions Standards for Hazardous Pollutants from Oil and Natural Gas Production Facilities (MACT HH) 40 CFR Part 71: Federal Operating Permit Programs Consent Decree Case No. 2:08-CV-00167-TS-PMW Civil Action No. 2:23cv252

Permit Number: V-UO-000005-2018.03 Issue Date: March 30, 2023
Replaces Permit No.: V-UO-000005-2018.01B Effective Date: November 22, 2021

1 Wonsits Valley Compressor station is owned by Andeavor Field Services, LLC and operated by MPLX according to information in permit V-UO-000005-2018.01.

Facility Information and Emission Unit Identification

Parent Company Name:	MPLX
Mailing Address:	1801 California Street, Suite 1200, Denver, Colorado 80202
Facility Contact:	Joshua Hirschi, Environmental Engineer (435) 781-7489
Facility Operator & Name:	MPLX, LP – Wonsits Valley Compressor Station (Wonsits)
Facility Location:	Latitude 40.140792, Longitude -109.494322
County, State:	Uintah, Utah
Reservation:	Uintah and Ouray Indian Reservation
Tribe:	Ute Indian Tribe
Responsible Official:	Michael Gebhardt, Vice President, Mid-Continent Gathering and Processing
SIC Code:	1311 – Crude Petroleum and Natural Gas
AFS ID:	49-047-00103
Other CAA Permits:	There are no other CAA permits for this facility.

Enforcement History

Questar Gas Management Company, a predecessor of Andeavor and MPLX, entered into a Consent Decree with the United States (Case No. 2:08-CV-00167-TS-PMW) on July 3, 2012, to resolve alleged violations of several MACT ZZZZ and MACT HH requirements at the Coyote Wash, Chapita, Island, Wonsits Valley, and River Bend Compressor Stations. The Consent Decree was terminated on June 4, 2014 (see Appendix C); however, several requirements survive termination of the decree. (See Section V of this report.)

The EPA issued a Notice of Violation (NOV) to MPLX LP on November 22, 2019, which included alleged violations of NSPS JJJJ, MACT HH and MACT ZZZZ at Wonsits Valley for:

(1) Failure to conduct performance tests of a secondary control device, enclosed combustor C-2, during periods when the primary control device, flare FL-1 at a major source of HAPs, in violation of the MACT HH testing requirements for applicable control device requirements specified in § 63.771(d) or§ 63.771(f), and the requirements for initial performance testing of enclosed combustion devices at § 63.772(e). Additionally, Paragraph II.D.2. of the previous Title V operating permit, permit number V-UO-000005-2000.00, for the Wonsits Valley requires that each control device required to comply with MACT HH shall comply with the monitoring requirements as specified in § 63.773(b) or § 63.773(d).
(2) Failure to continuously operate a control device during operation of a dehydrator at Wonsits Valley.
(3) Failure to conduct performance tests after catalyst replacement on Engine C207, in violation of the MACT ZZZZ testing requirements at 40 C.F.R. § 63.6640(b), the MACT ZZZZ emissions limitations and operating limitations at 40 C.F.R. § 63.6600(b), and the requirements of Paragraphs III.C.2 and III.E.2 of the previous Title V permit for Wonsits Valley, V-UO-000005-2000.00;
(4) Failure to timely submit MACT ZZZZ performance test results for Engines C202, C203, C204, C206 and C207, in violation of the reporting requirements at § 63.7(g)(1);
(5) Failure to timely submit NSPS JJJJ performance test results for Engines C202, C203, C204, C206 and C207, in violation of the reporting requirements at 40 C.F.R. § 60.4245(d); and
(6) Emitting VOC in excess of 1.0 g/hp-hr from Engine C207, in violation of the NSPS JJJJ emission limits set forth for Engine C207 as specified in 40 C.F.R. § 60.4233(f)(4) and (e) and Paragraph

IV.C.1 of the previous Title V permit for Wonsits Valley, Permit Number V-UO-000005-2000.00. Additionally, failure to conduct a performance test on Engine C207 according to the requirements of 40 C.F.R. §§ 60.4244(c) and 60.8(f) because the test was concluded after the first test run.

MPLX entered into a Consent Decree with the United States (See Civil Action No. 2:23cv252, not attached) effective July 21, 2023, to resolve alleged violations of MACT ZZZZ at the Wonsits Valley Compressor Station. The Consent Decree includes alleged violations of both MACT ZZZZ and separate regulations at multiple compressor stations and gas plants. MPLX was ordered to pay civil penalties totaling $2,000,000 plus interest, as follows: (i) $1,558,100 to the United States; (ii) $325,200 to the State of North Dakota; (iii) $116,700 to the State of Wyoming. See Section V of this report for provisions of the Civil Action that were evaluated for compliance during the inspection.

There are no additional finalized enforcement actions at the time of the inspection.

Inspection Findings/Areas of Concern

1. EPA advised MPLX to consider back pressure regulators on ECD's to allow for more complete combustion of emissions being routed to a control device.
2. Where possible, EPA advised MPLX to route emissions to a control device or vapor balance during maintenance. MPLX was cleaning out the dehydration unit condensable tank and EPA viewed emissions via FLIR. There are no requirements to control emissions during maintenance in MACT HH but where possible MPLX should minimize emissions.

Compliance Assistance

A copy of this report, which highlights EPA's areas of concern, is being provided to MPLX upon finalization.

Description of Operations[2]

Wonsits Valley gathers natural gas, natural gas condensate and produced water from surrounding well sites via a gathering pipeline system. The comingled stream enters the station and is routed to a slug catcher where the liquids and natural gas are separated. From the slug catcher, the liquids are routed to a 3-phase separator, where the natural gas, condensate and produced water are separated.

The condensate is routed to the station discharge and then off site to a gas plant. The produced water is temporarily stored in the slop tank (emissions unit T-1 in Table 2 below) and the emissions are controlled with the combustor unit (emissions unit C-1 in Table 2 below). Liquids from T-1 are gravity fed offsite.

The natural gas exits the slug catcher and 3-phase separator as mentioned in the first paragraph, where it is routed to an inlet scrubber; condensate and produced water that are removed during this process are also routed to T-1.

The natural gas is then compressed from field pressure to approximately 1,200 pounds per square inch gauge (psig) from five reciprocating internal combustion engines (RICE) that are also located onsite. The compressed natural gas enters the dehydration unit, emissions unit D-1, and is bubbled up through lean triethylene glycol (TEG) in a process vessel called a contactor. During this process, water vapor is removed from the gas to a concentration determined by a sales contract. The pipeline quality natural gas then exits the contactor, is metered and then routed off site. Natural gas used to fuel equipment at Wonsits Valley is pulled from the discharge after the dehydrator where it is filtered and separated.

The rich TEG exits the contactor, is depressurized in a TEG flash tank, and is regenerated using heat in a vessel known as a reboiler (emissions unit R-1 in Table 2 below). The rich TEG is heated in R-1 to a set temperature

[2] The description of operations provided here is a modified excerpt from the process description provided by MPLX in its September 28, 2022 Title V permit V-UO-000005-2018.03.

that boils the impurities out of the TEG. The vapors from the reboiler are routed to the benzene, toluene, ethylbenzene and xylenes (BTEX) condenser to remove liquids that drain into the distillate tank. BTEX vapors from the distillate storage tank and flash gas from the flash tank are routed to the emission control device: a flare (emissions unit FL-1 in Table 2 below). The depressurized TEG is routed to a vessel called a glycol reboiler and regenerated using heat. The regenerated lean TEG is circulated back to the contactor.

There are fugitive emissions associated with the potential seeping of gas from connections, seals, flanges and valves. Instrument air is used on site for energizing pneumatic equipment.

General Inspection Observations and Commentary

EPA inspectors, and tribal representatives met with MPLX representatives at Wonsits Valley Compressor Station (Wonsits Valley) operated by MPLX at 12:38 PM on September 17, 2024. A Job Safety Analysis was conducted by MPLX representatives, and MPLX was informed that EPA inspectors would be using an intrinsically safe forward looking infrared (FLIR) camera. A hot work permit was required.

MPLX representatives discussed the following throughputs at the time of the inspection:

1. Natural gas throughput at time of inspection: 49 MMscf/d
2. Exit pressure of natural gas is 1015 psi.
3. Suction pressure of natural gas at the inlet: 125 psi.
4. The tank flare was operating at 1027°F.
5. The dehydration unit and flare controlling dehydration unit emissions were off and undergoing maintenance and cleaning.
6. Engine C-202 was not operating due to maintenance and low line pressures.

The following observations were taken during the facility walkthrough:

1. MPLX correctly uses a 300°F cutoff temperature for the dehydration unit flare setpoint.
2. The dehydration unit bypass line was open due to the shutdown dehydration unit for maintenance and cleaning. MPLX was cleaning out the dehydration unit condensable tank and EPA viewed emissions via FLIR. EPA inspectors noted that there are no requirements to control emissions during maintenance in MACT HH but where possible MPLX should minimize emissions.
3. The ECD controlling emissions from the storage vessels was operating, confirmed by presence of a heat signature on the IR camera, but MPLX representatives confirmed that no backpressure regulator was present. EPA advised MPLX that the use of a backpressure regulator allows for a more complete destruction of emissions routed to the unit (not a permit requirement).
4. No engine modifications (outside of like-kind replacements) or new equipment has been installed since the previous inspection.
5. C202, C203 and C204 did not appear to have matching serial numbers and manufacture dates printed on the engine to the same engines as in the Title V permit, however the engine type and model numbers were the same. MPLX representatives confirmed during a phone call on October 8, 2024 that like-kind replacements occurred and MPLX also provided the off-permit change notifications to EPA as part of the compliance evaluation. The next Title V renewal issued by EPA should include the correct serial numbers.
6. No tanks were venting emissions when viewed with the FLIR camera.

Engine Parameters Recorded During Inspection

Unit ID	Load (%)	Catalyst Inlet Temperature (°F)	Pressure Drop (inches of water)	Pressure Baseline (inches of water)
C202	Not operating at time of inspection.			6.6
C203	95	658	7.6	6.9
C204	87	679	7.1	7.1
C206	76	641	9.1	8.9

C207[a]	99	754 (East) 651 (West)	1.8 (East) 2.0 (West)	2.1 (East) 1.4 (West)

[a] Unit C207 is a dual-stack engine. East = East Stack (also referred to as the Left Bank); West = West Stack (also referred to as the Right Bank)

EPA and MPLX representative met for a closing conference. A confidential business information (CBI) warning was presented to MPLX representatives, and no CBI was claimed. During the on-site closing conference, EPA inspectors discussed emissions from the truck loadout from maintenance and cleaning of the dehydration unit. EPA inspectors also discussed a potential antifreeze odor near C-206. In a response provided September 24, 2024, MPLX representatives stated that a mechanic inspected the engine and found that there was a "very slow drip from the jacket water pump" and that C-206's water jacket has been scheduled to be repaired.

EPA staff departed the facility at 1:53 PM. An email to request relevant compliance-related information and records was sent to MPLX representatives prior to the onsite inspection and MPLX provided the requested information to EPA via email on September 24, 2024 and September 30, 2024.

Potential to Emit (PTE)

Pursuant to 40 CFR §52.21, potential to emit (PTE) is defined as the maximum capacity of a stationary source to emit a pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation, or the effect it would have on emissions, is federally enforceable.

While the potential to emit for hazardous air pollutants (HAPs), including formaldehyde (CH_2O), is below "major" source thresholds of 10 ton per year (tpy) for a single HAP or 25 tpy for any combination of HAP, the Wonsits Valley Compressor Station is a major source of HAP based on the requirements of Paragraph 158 and Paragraph 169 of federal consent decree Case No. 2:08-CV-00167-TS (see excerpts below).

> *Paragraph 158: The Wonsits Valley facility is a "major source" of HAP emission within the meaning of Section 112(a)(1) of the Act, 42 U.S.C. § 7412(a)(1), and 40 C.F.R. § 63.761 (definition of "major source"). It became a major HAP source in or around July 2001 upon the startup of the 100 MMscfd TEG dehydrator.*
>
> *Paragraph 169. The Wonsits Valley facility is a "major source" of HAP emission within the meaning of Section 112(a)(1) of the Act, 42 U.S.C. § 7412(a)(1), and 40 C.F.R. §§ 63.6585(b) & 63.6675 (definition of "major source"). It became a major HAP source in or around June 2001 when four Waukesha 4SLB compressor engines, each site rated at 2872 bhp, were installed at the Wonsits Valley facility (in addition to the 100 MMscfd TEG dehydrator).*

See Table 2, below, for facility-wide and emission unit-specific PTE data included in the Statement of Basis for Permit No. V-UO-000005-2018.03 for the Wonsits Valley Compressor Station. The PTE totals below include reductions from legally and practically enforceable requirements set forth in the Title V permit, including a federal Consent Decree (See Section V, below).

Table 2[3]: Potential to Emit in Tons Per Year (tpy)
MPLX Wonsits Valley Compressor Station

Table 2 – Potential-to-Emit Without Legally and Practicably Enforceable Controls

	Regulated Air Pollutants (tpy)										
	NO_X*	**CO***	**VOC***	**PM***	**SO_2***	**CH_2O ***	**Total HAPs ***	**CO_2***	**CH_4* (as CO_2e)**	**N_2O* (as CO_2e)**	**CO_2e***
C202	32.89	82.22	35.72	1.12	0.07	8.55	10.59	13,139	6.20	7.39	13,153
C203	32.89	82.22	35.72	1.12	0.07	8.55	10.59	13,139	6.20	7.39	13,152
C204	32.89	82.22	35.72	1.12	0.07	8.55	10.59	13,139	6.20	7.39	13,152
C206	38.91	65.85	21.91	1.00	0.06	5.29	7.11	11,713	5.52	65.83	11,784
C207	43.97	109.94	46.87	1.50	0.09	11.43	14.16	17,498	8.25	19.83	17,516
D-1	-	-	393.23	-	-	-	213.43	-	-	-	-
R-1	0.39	0.33	0.02	0.03	0.00	-	0.01	511.97	0.24	0.29	513
T-1	-	-	13.12	-	-	-	0.55	-	-	-	-
T-2 – T-9	-	-	1.12	-	-	-	0.07	-	-	-	-
EL	-	-	4.79	-	-	-	0.38	-	-	-	-
FL-1	0.02	0.02	0.00	0.00	0.00	-	-	-	-	-	-
C-1	0.01	0.005	-	-	-	-	-	-	-	-	-
~~C-2 Removed~~	~~0.05~~	~~0.03~~	~~0.00~~	~~0.00~~	~~0.00~~	~~-~~	~~0.00~~	~~-~~	~~-~~	~~-~~	~~-~~
LO	-	-	1.57	-	-	-	-	-	-	-	-
ES	-	-	0.22	-	-	-	0.01	-	-	-	-
CB	-	-	10.05	-	-	-	0.49	-	-	-	-
ESD	-	-	0.067	-	-	-	0.003	-	-	-	-
PG	-	-	10.17	-	-	-	0.01	-	-	-	-
TOTAL	**182.02**	**422.84**	**610.30**	**5.89**	**0.36**	**42.37**	**267.99**	**69,139.97**	**32.61**	**108.12**	**69,270**

*NO_X = nitrogen oxide; CO = carbon monoxide; VOC = volatile organic compound; PM = particulate matter; SO_2 = sulfur dioxide; CH_2O = formaldehyde; HAP = hazardous air pollutant; CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = equivalent CO_2.

Table 3 – Potential-to-Emit With Legally and Practicably Enforceable Controls

	Regulated Air Pollutants (tpy)										
	NO_X	**CO**	**VOC**	**PM**	**SO_2**	**CH_2O**	**Total HAPs**	**CO_2**	**CH_4 (as CO_2e)**	**N_2O (as CO_2e)**	**CO_2e**
C202	32.9	32.9	17.9 [a]	1.1	0.1	1.64	2.7	13,139	6.20	7.39	13,153
C203	32.9	32.9	17.9 [a]	1.1	0.1	1.64	2.7	13,139	6.20	7.39	13,153
C204	32.9	32.9	17.9 [a]	1.1	0.1	1.64	2.7	13,139	6.20	7.39	13,153
C206	38.9	29.9	11.0 [a]	1.0	0.1	2.69	3.6	11,713	5.52	65.83	11,784
C207	44.0	44.0	23.4[b]	1.5	0.1	2.20	3.6	17,498	8.25	9.83	17,516
D-1	-	-	15.3 [c]	-	-	-	6.12	-	-	-	-

[3] Note: C-2 has been removed from the facility in April 2022. It remains in this table because it operated during the time between the previous inspection which was on March 12, 2019.

Regulated Air Pollutants (tpy)											
R-1	0.39	0.33	0.02	0.03	0.00	-	0.01	511.97	0.24	0.29	513
T-1	-	-	0.7	-	-	-	0.03	-	-	-	-
T-2 – T-9	-	-	-	-	-	-	-	-	-	-	-
EL	-	-	4.8	-	-	-	0.4	-	-	-	-
FL-1	0.7	0.02	-	-	-	-	-	-	-	-	-
C-1	0.4	0.1	-	-	-	-	-	-	-	-	-
~~C-2 Removed~~	~~0.05~~	~~0.03~~	~~0.00~~	~~0.00~~	~~0.00~~	~~-~~	~~0.00~~	~~-~~	~~-~~	~~-~~	~~-~~
LO	-	-	1.57	-	-	-	-	-	-	-	-
ES	-	-	0.22	-	-	-	0.01	0.05	32.04	-	32
CB	-	-	10.0	-	-	-	0.5	-	-	-	-
ESD	-	-	0.07	-	-	-	0.003	0.02	9.61	-	10
GP	-	-	10.57	-	-	-	0.51	2.37	1,515.69	-	1,518
PG	-	-	1.26	-	-	-	0.06	0.28	180.44	-	181
TOTAL	**183.14**	**173.08**	**132.61**	**5.83**	**0.5**	**9.81**	**22.94**	**69,143**	**1770.39**	**98.12**	**71,013**

a. Based on the enforceable emission limit of 1.0 g/hp-hr limit in the Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (NSPS JJJJ).

b. Based on the enforceable emission limit of 0.7 g/hp-hr limit in NSPS JJJJ.

c. Based on the enforceable requirement of a 95% reduction of VOC emissions in National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities.

Permit Number V-UO-000005-2018.01 Requirements and Compliance Status

Inspector notes discussing compliance status will follow each relevant permit requirement in **bold blue** font.

A. Facility Emission Points

Table 4 - Emission Units and Emission Generator Activities

Unit I.D.	Description	Control Equipment
C202 C203 C204	Caterpillar G3612LE Compressor Engine; 3,406 hp*, 4SLB* RICE*, Natural Gas-Fired Serial No. 1YG00023 Installed: 9/2007, Manufactured: 10/21/2001, Reconstructed: 9/2007 Serial No. 1YG00022 Installed: 9/2007, Manufactured: 10/10/1991, Reconstructed:9/2007 Serial No. 1YG00034 Installed: 9/2007, Manufactured: 5/12/1993, Reconstructed: 9/2007 **EPA inspectors noted the serial numbers and engine information during the onsite inspection.** **C202 was recorded with a serial number of 1YG00143 and a mfg date of May 1998. MPLX confirmed a like kind replacement submitted in April 2023 during a phone call 10/8/2024 and subsequent email.** **C203 was recorded with a serial number of 1YG00023 and a mfg date was unreadable. This was originally C202 but during the like kind replacement for C202, this engine replaced C203 which was confirmed by MPLX during a phone call 10/8/2024 and subsequent email.** **C204 was recorded with a serial number of 1YG00142 and a mfg date of May 1998. A like kind replacement occurred December 2022, which was confirmed by MPLX during a phone call 10/8/2024 and subsequent email.**	Selective Catalytic Oxidation
C206	Waukesha 12V-AT27GL Compressor Engine; 3,100 hp, 4SLB RICE, Natural Gas-Fired Serial No. C-13271/2 Installed: 3/2001, Manufactured: 12/7/2000, Reconstructed: 6/2007 **EPA inspectors confirmed the serial numbers and engine information matched C206 as permitted during the onsite inspection.**	Selective Catalytic Oxidation
C207	Caterpillar G3616LE Compressor Engine; 4,554 hp, 4SLB RICE, Natural Gas-Fired Serial No. BLB00215 Installed: 6/2008, Manufactured: 12/5/1993, Reconstructed: 1/2014 **EPA inspectors confirmed the serial numbers and engine information matched C206 as permitted during the onsite inspection.**	Selective Catalytic Oxidation

Unit I.D.	Description	Control Equipment
D-1	100 MMscfd* Triethylene Glycol Dehydrator	Flare (FL-1) Combustor (C-2)
R-1	1.0 MMBtu* Glycol Reboiler	None (IEU)
T-1	500 bbl* Slop Tank, referred to as the Condensate Tank in the Consent Decree No. 2:08-CV-00167-TS-PMV 21,900 bbls per year Annual Condensate Throughput	Combustor (C-1) (IEU)
T-2 T-3 T-4 T-5 T-6 T-7 T-8 T-9	Miscellaneous Chemical Storage Tanks 100 bbl New Glycol 100 bbl New Lube Oil 100 bbl Used Lube Oil 100 bbl Used Glycol 65 bbl Glycol 100 bbl Produced Water 100 bbl Dehydrator Drip Tank 100 bbl Dehydrator Drip Tank	None (IEU)
EL	Fugitive Equipment Leaks	None
PG	Pigging Operations	None (IEU)
ES	Engine Start-ups	None (insignificant emission unit)
CB	Compressor Blowdowns	None
ESD	Emergency Shutdowns	None (IEU)
FL-1	Elevated Open-Flame Flare	Dehydrator (D-1) (IEU)
C-1	Cimarron 47" model AB-200 ECD*	Slop Tank (T-1) (IEU)

* IEU = Insignificant Emission Unit; 4SLB = 4 Stroke Lean Burn; RICE = Reciprocating Internal Combustion Engines; hp = horsepower; bbl = barrel; MMscfd = million standard cubic feet per day; MMBtu/hr = million British thermal units per hour; ECD = Enclosed Combustors.

Table 5: Requirements for Emission Units

Equipment	Applicable Requirements	Limitations	Monitoring	
			Method	Interval
C202, C203, C204 (3) 3406 hp Caterpillar 3612LE	MACT ZZZZ	Oxidation catalyst reducing CO emissions by 93% or more	Performance test CPMS[a]: Catalyst Inlet Temp. and ΔP	Semi-Annual[b] Continuous
C206 (1) 3100 hp Waukesha 12V-AT27GL	NSPS JJJJ	NO_x = 2.0 g/hp-hr CO = 4.0 g/hp-hr VOC = 1.0 g/hp-hr	Performance test	Every three years or 8,760 hours of operations
	Both Consent Decree's (CD)	NO_x = 1.0 g/hp-hr (except C206 which complies with NO_x = 1.3 g/hp-hr) CO = 1.0 g/hp-hr	Performance test	Semi-Annual
C207 (1) 4554 hp Caterpillar 3616LE	MACT ZZZZ	Oxidation catalyst reducing CO emissions by 93% or more	Performance test CPMS[a]: Catalyst Inlet Temp. and ΔP	Semi-Annual[b] Continuous

	NSPS JJJJ	NO_x = 1.0 g/hp-hr CO = 2.0 g/hp-hr VOC = 0.7 g/hp-hr	Performance test	Every three years or 8,760 hours of operations
	Both Consent Decree's (CD)	NO_x = 1.0 g/hp-hr CO = 1.0 g/hp-hr	Performance test	Semi-Annual
D-1 100 MMscfd Glycol Dehydrator	MACT HH Consent Decree (CD)	Control device reducing VOC emissions by 95% or more	Presence of pilot light No visible emissions	Continuous
R-1 10 MMBtu Glycol Reboiler	MACT HH	Reduce mass content of TOC or HAP by 95.0% by weight or greater OR Operate at a minimum temperature of 760°C Vent stream shall be introduced into the flame zone	Temperature	Continuous
T-1 500 bbl Condensate Tank	Consent Decree (CD)	Control device reducing VOC emissions by 95% or more	Presence of pilot light No visible emissions	Continuous

[a] CPMS = Continuous Parametric Monitoring System
[b] If the results of two consecutive semi-annual tests demonstrate compliance, the frequency of testing may be reduced to annual.

OBSERVATION: EPA inspectors confirmed each engine nameplate for matching make, model, and serial number information from the nameplates matched the information listed in the permit, unless otherwise noted above.

II. Standards of Performance for Stationary Spark Ignition Internal Combustion Engines - 40 CFR Part 60, Subpart JJJJ

A. Applicability [40 CFR 60.4230 (a)(5)]

1. 40 CFR part 60, subpart JJJJ applies to the following emission units:

   (a) Caterpillar G3612LE engine identified as C202 in Table 2 of this permit;

   (b) Caterpillar G3612LE engine identified as C203 in Table 2 of this permit;

   (c) Caterpillar G3612LE engine identified as C204 in Table 2 of this permit;

   (d) Waukesha 12V-AT27GL engine identified as C206 in Table 2 of this permit; and

   (e) Caterpillar G3616LE engine identified as C207 in Table 2 of this permit.

2. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR part 60, subpart JJJJ (Subpart JJJJ).

   OBSERVATION: Engines C202, C203, C204, C206 and C207 are spark ignition (SI), internal combustion engines (ICE) reconstructed after June 12, 2006, and are, therefore, subject to NSPS JJJJ per §60.4230(a)(5).

B. General Provisions [40 CFR 60.4246]

1. The Facility is subject to the requirements of 40 CFR part 60, subpart A – General Provisions as specified in Table 3 of Subpart JJJJ. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR part 60, subpart A.

2. All reports required under 40 CFR part 60, subpart A shall be sent to the EPA at the following address as listed in § 60.19:

   Branch Chief, Air and Toxics Enforcement Branch, 8ENF-AT
   Enforcement and Compliance Assurance Division
   U.S. Environmental Protection Agency, Region 8
   1595 Wynkoop Street
   Denver, Colorado 80202-1129

   Reports may be submitted on electronic media where applicable through the Compliance and Emissions Reporting Data Interface (CEDRI).

B. Emission Standards [40 CFR 60.4233 (f)(4) and Table 1, 60.4234]

1. The Permittee shall comply with the emissions standards for non-emergency, spark ignition (SI) internal combustion engines (ICE) greater than 1,350 hp that are modified or reconstructed after June 12, 2006 for C202, C203, C204, C206 and C207 as specified in § 60.4233(f)(4) and Table 1 to Subpart JJJJ.

2. The Permittee must operate and maintain the stationary SI ICE subject to the emission standards as required in § 60.4233 over the entire life of the engine as specified in § 60.4234.

OBSERVATION: Pursuant to §60.4233(f)(4) and NSPS JJJJ Table 1, engines C202, C203, C204, C206, and C207 utilize oxidation catalysts for emissions control in order to meet the following emission standards for non-emergency, natural gas SI engines greater than 500 hp:

Engines C202, C203, C204, and C206 (manufacture date on or after July 1, 2007)
NO_x = 2.0 g/hp-hr
CO = 4.0 g/hp-hr
VOC = 1.0 g/hp-hr

Engine C207 (manufacture date on or after July 1, 2010)
NO_x = 1.0 g/hp-hr
CO = 2.0 g/hp-hr
VOC = 0.7 g/hp-hr

Performance tests results since the last inspection indicates compliance with the NSPS JJJJ emission standards. See Table 6 below.

C. Compliance Requirements [40 CFR 60.4243 (c)]

The Permittee, as the owner and operator of stationary SI ICE that must comply with the emission standards specified in Section II.C. of this permit, shall demonstrate compliance according to one of the methods specified in paragraphs 1 or 2 of this section as applicable:

1. Purchasing an engine certified according to the procedures specified in Subpart JJJJ for the same model year and demonstrating compliance according to one of the methods specified in paragraphs 1. (a) or (b) of this section:

   (a) If the Permittee operates and maintains the certified stationary SI ICE and control device

according to the manufacture's emission-related written instructions, the Permittee shall keep records of conducted maintenance to demonstrate compliance, but no performance testing is required. The Permittee shall also meet requirements as specified in 40 CFR 1068 subparts A through D, as applicable. If the Permittee adjusts engine settings according to and consistent with the manufacturer's instructions, the stationary SI ICE will not be considered out of compliance; or

(b) If the Permittee does not operate and maintain the certified stationary SI ICE and control device according to the manufactures emission-related written instructions, the engine will be considered a non-certified engine and the Permittee shall demonstrate compliance according to §§ 60.4243(a)(2)(i) through(iii) as appropriate; or

2. Purchasing a non-certified engine and demonstrating compliance with the emission standards specified in Section II.C. of this permit and according to the test methods and other procedures specified in § 60.4244, and according to the following:

As an owner or operator of a stationary SI ICE greater than 500 hp, the Permittee shall keep a maintenance plan and records of conducted maintenance and shall, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, the Permittee shall conduct an initial performance test and conduct subsequent performance testing every 8,760 hours or for 3 years, whichever comes first, to demonstrate compliance.

Note to Permittee: The initial performance testing has been satisfied for the engines currently operating at this facility. The requirements for initial performance testing are retained in this permit in the case of new construction, installation or modification of an affected source under this subpart.

OBSERVATION: Pursuant to §60.4243(b)(2)(ii), MPLX is required to keep a maintenance plan and records of conducted maintenance on C202, C203, C204, C206, and C207, and to operate the engines in a manner consistent with good air pollution control practices. MPLX provided maintenance records for C202, C203, C204, C206, and C207 to EPA upon request. Documents indicate that maintenance is scheduled to be conducted at regularly scheduled intervals of at least 720 operating hours. MPLX also provided maintenance reports separately for 2000, 2500, 4,000, 10,000, 16,000 and 50,000 operating hour intervals all of which include more thorough engine maintenance than solely visual inspection, including oil analysis, wiring, electrical, lubricant, valve clearance, torque specs and cylinder/bearing checks.

Additionally, an initial performance test must be conducted on each engine, with subsequent testing every 8,760 hours or three years, whichever comes first. See Table 6, below, for NSPS JJJJ performance tests conducted at the Wonsits Valley Compressor Station from 2022 to present.

D. Testing Requirements [40 CFR 60.4244 (a)-(f)]

The Permittee shall comply with the performance testing requirements for the non-emergency, SI ICE greater than 1,350 hp as specified in § 60.4244 (a)-(f) for emissions units C202, C203, C204, C206 and C207.

OBSERVATION: Pursuant to §60.4243(c) and (b)(2)(ii), engines C202, C203, C204, C206, and C207 must conduct performance tests every 8,760 hours of operation or 3 years, whichever comes first. Results of NSPS JJJJ performance tests are displayed in Table 6, below.

According to §60.4244(b), if an engine is non-operational, it does not need to be started up for testing; however, the performance test must be conducted immediately upon startup.

Tests on all engines appear to have been conducted in accordance with the test methods required by NSPS Subpart JJJJ (40 CFR §60.4244), that is to conduct subsequent performance testing every 8,760

hours or 3 years, whichever comes first, thereafter to demonstrate compliance using an approved test method. The tests all appeared to follow three 1-hour test runs as specified in NSPS JJJJ.

E. Notification, Reports and Records [40 CFR 60.4245]

The Permittee shall comply with all the applicable notification, reporting, and recordkeeping requirements for non-emergency SI ICE greater than 1,350 hp, as specified in § 60.4245, for emissions units C202, C203, C204, C206 and C207, except that reports of required performance tests shall be submitted with the respective semiannual report required in Section VI.B.1. of this permit that corresponds with the reporting period within which the test was conducted.

OBSERVATION: Per §60.4245(d), owners and operators must submit a copy of each performance test conducted to demonstrate compliance with NSPS JJJJ within 60 days of the test completion date. MPLX provided notification and reports within the timelines required in NSPS JJJJ since the previous inspection.

MPLX maintains records as required by §60.4245(a), and copies of maintenance records were submitted to EPA upon request as discussed above.

Table 6: Results of NSPS JJJJ Performance Testing (NO_x, CO, VOC)

Emission Unit ID	S/N	Test Date(s)	Avg. NO_x (g/hp-hr)	NO_x Limit* (g/hp-hr)	Avg. CO (g/hp-hr)	CO Limit* (g/hp-hr)	Avg. VOC (g/hp-hr)	VOC Limit (g/hp-hr)	Avg. Load	Engine Run Time (hrs)
C202	1YG00023	5/26/2022	0.83	2.0	0.00	4.0	0.29	1.0	80.7%	96143
C202	1YG00023	5/4/2023	0.54	2.0	0.01	4.0	0.35	1.0	88.0%	141
C202	1YG00023	5/14/2024	0.40	2.0	0.00	4.0	0.35	1.0	88.0%	8901
C203	1YG00022	5/25/2022	0.61	2.0	0.01	4.0	0.30	1.0	87.3%	127021
C203	1YG00022	5/1/2023	0.51	2.0	0.01	4.0	0.31	1.0	96.7%	134,621
C203	1YG00022	5/15/2024	0.82	2.0	0.00	4.0	0.22	1.0	90.0%	142,459
C204	1YG00034	5/25/2022	0.81	2.0	0.01	4.0	0.29	1.0	79%	N.R.
C204	1YG00142	1/10/2023	0.50	2.0	0.00	4.0	0.30	1.0	87%	100,997
C204	1YG00142	5/1/2023	0.40	2.0	0.01	4.0	0.03	1.0	100%	3,127
C204	1YG00142	5/13/2024	0.71	2.0	0.00	4.0	0.25	1.0	85%	11,665
C206	C-13271/2	5/26/2022	0.47	2.0	0.06	4.0	0.42	1.0	77%	13,068
C206	C-13271/2	1/10/2023	0.42	2.0	0.05	4.0	0.40	1.0	93%	15,340
C206	C-13271/2	5/2/2023	0.73	2.0	0.05	4.0	0.31	1.0	98%	17,612
C206	C-13271/2	5/14/2024	0.75	2.0	0.03	4.0	0.30	1.0	96%	25,841
C207[c]	BLB00215	5/24/2022	0.54	1.0[d]	0.05	2.0[d]	0.34	0.7[d]	92%	102,956
C207[c]	BLB00215	5/3/2023	0.68	1.0[d]	0.05	2.0[d]	0.19	0.7[d]	89%	110,807
C207[c]	BLB00215	5/14/2024	0.65	1.0[d]	0.02	2.0[d]	0.20	0.7[d]	98%	119,277

Note: Consent Decree/Permit limits for NO_x and CO are more stringent than NSPS JJJJ limits.
n.r = Not Reported
C202 run time reverted back to zero after exceeding 99,999 hours.
C206 had a catalyst replaced on January 5, 2023.

III. National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities – 40 CFR Part 63, Subpart HH

A. Applicability[40 CFR 63.760 (a)-(b)]

40 CFR part 63, subpart HH applies to the 100 MMscfd TEG dehydrator identified as D-1, and control device FL-1 in Table 2 of this permit.

Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR part 63, subpart HH for affected sources located at a major source of hazardous air pollutants (HAP).

OBSERVATION: The glycol dehydrator meets the definition of large glycol dehydration unit at §63.761. Per Paragraph 158 of the federal consent decree (Case No. 2:08-CV-00167-TS-PMV), the Wonsits Valley Compressor Station is considered a major source of HAP under MACT HH.

Enclosed combustor, C-2, was removed in April 2022.

B. General Standards [40 CFR 63.764]

1. The General Provisions at 40 CFR part 63, subpart A apply as specified in Table 2 of 40 CFR part 63, subpart HH. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR part 63, subpart A.

2. All reports required under 40 CFR part 63, subpart A shall be sent to the EPA at the following address as listed in § 63.13:

   Branch Chief, Air and Toxics Enforcement Branch, 8ENF-AT
   Enforcement and Compliance Assurance Division
   U.S. Environmental Protection Agency, Region 8
   1595 Wynkoop Street
   Denver, Colorado 80202-1129

   Reports may be submitted on electronic media where applicable through CEDRI.

3. The Permittee shall comply with the following requirements for the large glycol dehydrator at a major source as specified in § 63.764(c):

   (a) The control requirements for glycol dehydrator process vents specified in § 63.765;

   (b) The monitoring requirements specified in § 63.773; and

   (c) The recordkeeping and reporting requirements specified in §§ 63.774 and 63.775.

4. At all times, the Permittee shall operate and maintain any glycol dehydration unit, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the EPA which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records and inspection of the unit.

OBSERVATION: The glycol dehydrator (D-1) at Wonsits Valley is controlled by a flare (F-1). Control device downtime is reported by MPLX in its Semi-Annual Periodic MACT HH Reports. (See Table 7)

C. Glycol Dehydration Unit Process Vent Standards [40 CFR 63.765(b)]

The Permittee shall comply with the control equipment requirements as follows:

1. Except as specified in § 63.765(c), the Permittee shall comply with the applicable requirements for large glycol dehydration unit process vents at major sources of HAP specified in § 63.765(b)(1) and (2):

   (a) For each large glycol dehydration process vent, the Permittee shall control air emissions by either paragraph (b)(1)(i) or (ii) of § 63.765.

      (i) The Permittee shall connect the process vent to a control device or combination of control devices through a closed-vent system, the closed-vent system shall be designed and operated in accordance with the requirements of § 63.771(c). The closed-vent system shall be designed and operated in accordance with the requirements of § 63.771(d); or

      (ii) The permittee shall connect the process vent to a control device or combination of control devices through a closed-vent system and the outlet benzene emissions from the control device(s) shall be reduced to a level less than 0.90 megagrams per year. The closed-vent system shall be designed and operated in accordance with the requirements of § 63.771(c). The control device shall be designed and operated in accordance with the requirements of § 63.771(d), except that the performance levels specified in § 63.771(d)(1)(i) and (ii) do not apply; and

   (b) One or more safety devices that vent directly to the atmosphere may be used on the air emission control equipment installed to comply with paragraph (b)(1) of § 63.765.

OBSERVATION: The dehydration unit at Wonsits Valley Compressor Station is considered a large dehydration unit, and therefore the requirements in 40 CFR §63.771(d) apply.

According to information from previous inspection reports, flash gas from the dehydration unit is routed back into the process and used as fuel for the reboiler. Any flash gas from the dehydration unit that cannot be used by the reboiler burner is routed to a John Zink air-assisted flare with a manufacturer's guarantee of 98% hydrocarbon emission reduction, however MPLX may only use 95% as their enforceable limit through MACT HH. Per 40 CFR §63.771(d)(1)(iii), the flare must be designed and operated in accordance with the requirements of 40 CFR §63.11(b). The presence of a pilot light in the flare is continuously monitored via thermocouple. The flares operating parameters were reviewed while onsite and during records review. While onsite, MPLX noted that the current flare shut-off temperature of based on pilot/combustion zone (thermocouple is located on the pilot which is enveloped by the combustion of vapors when emissions are routed to the flare) is 300°F. The flare and dehydration unit were not operating during the inspection. Pursuant to 40 CFR §§63.771(e)(1)(i) and (e)(2), no performance test on the flare is required. Records for §63.11(b) were reviewed and MPLX included sufficient information, btu content and flare tip velocity, to determine compliance during the previous inspection.

A safety device, as described in 40 CFR 63.771(c)(3), that allows emissions to vent directly to the atmosphere was observed in the place of C-2, removed. MPLX representatives informed EPA Inspectors that the safety device is only if the flare, FL-1, is not operating. During the previous inspection in 2022, MPLX representatives stated that the dehydration unit will automatically shut in in the flare is not operating and the safety device allows the remaining gases in the closed vent system to vent to atmosphere if necessary during shut-in.

D. Control Equipment Requirements [40 CFR 63.771(b)-(d)]

1. For each cover, the Permittee shall comply with the cover requirements specified in § 63.771(b).

2. The Permittee shall comply with the closed-vent system requirements specified in § 63.771(c).

OBSERVATION: No leaks were detected from the closed vent system during the FLIR survey conducted by EPA inspectors. See the notes above that the unit was shut down for maintenance and that emissions seen were due to maintenance and cleaning.

3. For the control device, FL-1, the Permittee shall comply with the applicable control device requirements to reduce HAP emissions as specified in § 63.771(d).

OBSERVATION: As mentioned above, C-2 was removed in April 2022. FL-1 complies with the control device requirements to reduce HAP emissions per 63.771(d) by complying with the requirements of 63.11(b). A review of the 63.11(b) records provided by MPLX show that FL-1 complies with these requirements during the previous inspection.

E. Test Methods, Compliance Procedures and Compliance Determination Requirements [40 CFR 63.772 (b)-(c), and (e)-(f)]

The Permittee shall determine compliance with the requirements of 40 CFR part 63, subpart HH using the applicable test methods and compliance procedures for large glycol dehydration units specified in § 63.772.

1. The Permittee shall determine the glycol dehydration unit flowrate, benzene emissions or BTEX emissions as specified in § 63.772(b).

2. The Permittee shall comply with the test procedures for no detectable emissions in accordance with Method 21, 40 CFR part 60, appendix A, as specified in § 63.772(c).

3. The Permittee shall comply with the test procedures for control device performance for FL-1 and C-2 as specified in § 63.772(e).

3. The Permittee shall comply with the compliance demonstration for control device performance requirements for FL-1 as specified in § 63.772(f).

OBSERVATION: As mentioned above, C-2 was removed in April 2022. FL-1 complies with the control device requirements to reduce HAP emissions per 63.771(d) by complying with the requirements of 63.11(b). A review of the 63.11(b) records provided by MPLX show that FL-1 complies with these requirements during the previous 2022 inspection.

F. Inspection and Monitoring Requirements [40 CFR 63.773 (c) and (d)]

1. For each closed-vent system or cover required by the Permittee to comply with 40 CFR part 63, subpart HH, the Permittee shall comply with the inspection and monitoring requirements specified in § 63.773(c).

2. For the control device, FL-1, required by the Permittee to comply with 40 CFR part 63, subpart HH, the Permittee shall comply with the inspection and monitoring requirements as specified in § 63.773(d).

OBSERVATION: The inspection and monitoring requirements specified in §63.773(c) require an initial inspection to demonstrate that the closed-vent system operates with no detectable emissions. The initial inspection was conducted more than five years ago and so is not applicable to this compliance evaluation. Annual visual inspections for defects of the closed-vent and cover and annual Method 21 inspections on the closed-vent system are also required. Results of annual inspections were submitted with the MACT HH Semi-Annual Periodic Reports since the previous inspection are shown in Table 7 below.

MPLX representatives utilize a SCADA system to comply with additional monitoring parameters of the control device provided in the MACT HH semiannual reports. MPLX also maintains a system that

records if the dehydration unit was operating without controls and reports these items as well.

40 CFR § 63.773(d)(1)(iii) requires a CPMS performance evaluation at least once every 12 months. MPLX provided information in MACT HH semiannual reports indicating that CPMS performance evaluations were conducted annually.

G. Recordkeeping Requirements [40 CFR 63.774]

1. The recordkeeping provisions of 40 CFR part 63, subpart A, that apply and those that do not apply to the Permittee are listed in Table 2 of 40 CFR part 63, subpart HH.

2. The Permittee shall maintain the records specified in §§ 63.774(b), (c), (e) and (g).

3. Except as specified in § 63.774(c), the Permittee shall maintain the records specified in § 63.774(b).

4. If compliance with the benzene emission limit specified in § 63.765(b)(1)(ii) is elected, the Permittee shall document, to the Administrator's satisfaction, the items in § 63.774(c).

5. The Permittee shall keep records of the requirements of § 63.774(e) when using a flare to comply with § 63.771(d).

6. The Permittee shall maintain records, pursuant to § 63.774(g), of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control equipment and monitoring equipment. The Permittee shall maintain records of actions taken during periods of malfunction to minimize emissions in accordance with § 63.764(j), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

OBSERVATION: According to MPLX representatives, the facility logs and maintains records through a SCADA system, and records are stored at a central location at the MPLX facility located in Vernal, Utah. Records of malfunctions and corrective actions were submitted with periodic reports.

H. Reporting Requirements [40 CFR 63.775]

1. The reporting provisions of subpart A of this part, that apply and those that do not apply to the Permittee are listed in Table 2 of this subpart.

3. The Permittee shall submit the information specified in § 63.775(b).

3. The Permittee shall submit Notification of Compliance Status Reports as specified in § 63.775(d).

4. The Permittee shall submit Periodic Reports as specified in § 63.775(e).

5. The Permittee shall submit notifications of process changes as specified in § 63.775(f).

6. The Permittee shall comply with any applicable electronic reporting provisions specified at § 63.775(g).

OBSERVATION: The Initial Notification required by § 63.775(b) and the Notification of Compliance Status required by § 63.775(d) were submitted prior to the last full compliance evaluation. The facility

submits semiannual periodic MACT HH reports as required by § 63.775(e). The semiannual reports provide information on excess emissions, CPMS downtime, flare and combustor downtime, dehydrator operation time, and closed vent system inspections. Pursuant to the requirements of § 63.775(f), process changes are to be reported within 180 days after the process change is made or as a part of the next periodic report, whichever is sooner. Based on the information provided by MPLX, no process changes have taken place at the Wonsits Valley Compressor Station since the previous full compliance evaluation.

The following MACT HH periodic monitoring reports covering the reporting periods from January 1, 2022 – June 30, 2024 have been submitted by MPLX for the Wonsits Valley Compressor Station.

Table 7: Wonsits Valley Compressor Station MACT HH Reports

Reporting Period	Report Date	Date Report Received	Comments
January 1 – June 30, 2022	7/31/22	7/31/22	• Reported 0.46 hrs of flare downtime with facility operating. • Annual Method 21 and visual inspection of cover and CVS conducted 4/19/2022. Reported no leaks or defects found. • Reported 2.74 hrs CMS downtime.
July 1 – December 31, 2022	1/31/23	1/31/23	• No deviations reported
January 1 – June 30, 2023	7/28/23	7/38/23	• 0.1 hours of CPMS downtime reported. • 35.91 hours of flare off and facility off • 233 hours of "bad input." • Annual Method 21 and visual inspection of cover and CVS conducted 5/27/2023. Reported no leaks or defects found.
January 1 – December 31, 2023	1/30/24	1/30/24	• No deviations reported • 17.28 hours of flare off and facility off • CMS Audit 10/16/2023
January 1 – June 30, 2024	7/29/2024	7/29/2024	• No deviations reported • 6.12 hours of flare off and facility off • Annual Method 21 and visual inspection of cover and CVS conducted 4/23/2021. Reported no leaks or defects found.

IV. National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines - 40 CFR Part 63, Subpart ZZZZ

A. Applicability [40 CFR 63.6585(a)]

40 CFR part 63, subpart ZZZZ applies to the following emission units:

1. Caterpillar G3612LE engine identified as C202 in Table 2 of this permit;

2. Caterpillar G3612LE engine identified as C203 in Table 2 of this permit;

3. Caterpillar G3612LE engine identified as C204 in Table 2 of this permit;

4. Waukesha 12V-AT27GL engine identified as C206 in Table 2 of this permit; and

5. Caterpillar G3616LE engine identified as C207 in Table 2 of this permit.

OBSERVATION: Per the federal consent decree (Case No. 2:08-CV-00167-TS-PMV), the Wonsits Valley Compressor Station is a major source of HAP under MACT ZZZZ. Therefore, engines C202, C203, C204, C206, and C207 are considered new (reconstructed after December 19, 2002), 4-stroke lean burn (4SLB), spark ignition (SI), natural gas-fired engines with greater than 500 hp located at a major source

of HAP. These engines are subject to emissions limitations in MACT ZZZZ Table 2a (#2) and operating limitations in Table 2b (#1).

B. General Provisions [40 CFR 63.6665]

1. The General Provisions at 40 CFR part 63, subpart A apply as specified in Table 8 of 40 CFR part 63, subpart ZZZZ. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR part 63, subpart A.

2. All reports required under 40 CFR part 63, subpart A shall be sent to the EPA at the following address as listed in § 63.13:

   Branch Chief, Air and Toxics Enforcement Branch, 8ENF-AT
   Enforcement and Compliance Assurance Division
   U.S. Environmental Protection Agency, Region 8
   1595 Wynkoop Street
   Denver, Colorado 80202-1129

   Reports may be submitted on electronic media where applicable through CEDRI.

C. Emission and Operating Limitations [40 CFR 63.6600and 63.6605]

1. The Permittee shall comply with the emissions limitations and operating limitations for stationary 4SLB RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions, specified in § 63.6600(b) for engines C202, C203, C204, C206 and C207.

2. The Permittee shall demonstrate compliance with general requirements for engines C202, C203, C204, C206 and C207 according to § 63.6605.

3. Pursuant to § 63.6600, compliance with the numerical emissions limitations for stationary 4SLB RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions established in 40 CFR part 63, subpart ZZZZ for engines C202, C203, C204, C206 and C207, shall be based on the results of testing the average of three 1-hour runs using the testing requirements and procedures in § 63.6620 and Table 4 to 40 CFR part 63, subpart ZZZZ.

OBSERVATION: Pursuant to 40 C.F.R. §63.6600, engines C202, C203, C204, C206, and C207 must meet the emission limitations established in MACT ZZZZ by either (a) reducing carbon monoxide (CO) emissions by 93% or more or (b) limiting the concentration of formaldehyde (CH_2O) in the exhaust to 14 ppmvd or less at 15% O_2. The engines at the Wonsits Valley Compressor Station comply with MACT ZZZZ using the CO reduction limitation option. In accordance with Table 3 (#1) to MACT ZZZZ, compliance with reduction requirements is determined through semi-annual performance testing. See Table 8, below for results of MACT ZZZZ performance tests conducted at the Wonsits Valley Compressor Station since the previous inspection in 2022.

Engines C202, C203, C204, C206, and C207 meet the continuous monitoring requirements of MACT ZZZZ Table 2b (#1) by (1) operating a continuous parametric monitoring system (CPMS) to ensure the catalyst inlet temperature is greater than or equal to 450°F and less than or equal to 1350°F, and (2) maintaining the pressure drop across the catalyst to within 2 inches of water of the pressure drop recorded during the performance test that established baseline operating parameters (at 100% load ± 10%). Per Table 6 (#1) of MACT ZZZZ, to demonstrate continuous compliance with CPMS requirements, MPLX must collect catalyst temperature, reduce the temperature data to 4-hour rolling averages, and ensure the 4-hour rolling averages are within the operating limitations for catalyst inlet temperature specified above. MPLX must also measure the pressure drop across the catalyst once per

month to demonstrate it is within the allowable range established during the performance test. In response to a request from EPA, MPLX provided catalyst temperature data and monthly pressure drop readings covering the period of July 1, 2022 through the date of inspection for engines C202, C203, C204, C206, and C207. EPA notes the rolling average listed temperatures in the compliant range and all monthly differential pressure readings reported were within 2 inches of the baseline differential pressure.

At the time of the inspection, the catalyst inlet temperature and catalyst pressure differential for the operating engines were within the compliant range.

D. Testing and Initial Compliance Requirements
[40 CFR 63.6610, 63.6615, 63.6620, 63.6625, and 63.6630]

1. The Permittee shall conduct the initial performance tests and other compliance demonstrations requirements for stationary 4SLB RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions, as specified in § 63.6610, for engines C202, C203, C204, C206 and C207.

   Note to Permittee: The initial performance testing has been satisfied for the engines currently operating at this facility. The requirements for initial performance testing are retained in this permit in the case of new construction, installation or modification of an affected source under this subpart.

2. The Permittee shall conduct subsequent performance tests for stationary 4SLB RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions, as specified in § 63.6615, for engines C202, C203, C204, C206 and C207.

3. The Permittee shall use the performance tests and other procedures for stationary 4SLB RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions, as specified § 63.6620 for engines C202, C203, C204, C206 and C207.

4. The Permittee shall comply with the monitoring, installation, collection, operation and maintenance requirements for stationary 4SLB RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions, as specified in § 63.6625, for engines C202, C203, C204, C206 and C207.

   OBSERVATION: Pursuant to §63.6625, EPA inspectors verified information from the CPMS while onsite for the inspection of Wonsits Valley. Additionally, operation and maintenance records were provided upon request.

5. The Permittee shall demonstrate initial compliance with the emission limitations, operating limitations and other requirements that apply to stationary 4SLB RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions, as specified in § 63.6630, for engines C202, C203, C204, C206 and C207.

   6. As an alternative to the test methods specified in 40 CFR part 63, subpart ZZZZ, Table 4, Item 1.a.iii, the Permittee may use EPA Method 320 to measure CO at the inlet and the outlet of the control device.

   Note to Permittee: The initial compliance has been satisfied for the engines currently operating at this facility. The requirements for initial compliance are retained in this permit in the case of new construction, installation or modification of an affected source under this subpart.

   OBSERVATION: Pursuant to §63.6615, §63.6620 and Table 3 to MACT ZZZZ, semi-annual performance testing must be conducted on engines C202, C203, C204, C206, and C207, with the option of moving to annual testing after two consecutive successful semi-annual tests. MPLX

moved to annual testing frequency following successively passing semi-annual performance tests in both 2014 and 2015 as discussed in previous inspection reports.

EPA had to request dP values from recent performance tests during this inspection period because certain values did not appear to be provided in the performance test report.

See Table 8, below, for results of all MACT ZZZZ performance testing conducted since January 1, 2022. Pressure drop and catalyst inlet temperature were measured during the testing.

Table 8: MACT ZZZZ Performance Testing at Wonsits Valley Compressor Station (2019 – Present)

Emission Unit ID	S/N	Test Date(s)	Notification Rcvd	Report Rcvd	Avg. CO Destruction Efficiency	CO Destruction Efficiency Requirement	Avg. Load	Catalyst ΔP (inches H_2O)
C202	1YG00023	5/4/2023	3/1/2023	6/7/2023	99.7%	93%	88.0%	7.4
C202	1YG00023	12/4/2023	8/25/2023	12/21/2023	100.0%	93%	87.7%	6.8
C202	1YG00023	5/14/2024	3/4/2024	5/30/2024	100.0%	93%	88.0%	6.9
C203	1YG00022	5/25/2022	3/24/2022	7/12/2022	99.6%	93%	87.3%	7
C203	1YG00022	5/1/2023	3/1/2023	6/7/2023	99.6%	93%	96.7%	7.8
C203	1YG00022	11/6/2023	8/25/2023	11/20/2023	99.9%	93%	93.7%	7.8
C203	1YG00022	5/15/2024	3/4/2024	5/30/2024	100.0%	93%	90.0%	7.4
C204	1YG00034	5/25/2022	3/24/2022	7/12/2022	100%	93%	79%	6.8
C204	1YG00142	1/10/2023	12/7/2022	3/1/2023	100%	93%	87%	6.5
C204	1YG00142	5/1/2023	3/1/2023	6/7/2023	99.6%	93%	100%	7.1
C204	1YG00142	11/7/2023	8/25/2023	11/20/2023	99.9%	93%	92%	7.2
C204	1YG00142	5/13/2024	3/4/2024	5/30/2024	100.0%	93%	85%	6.9
C206	C-13271/2	5/26/2022	3/24/2022	7/12/2022	98.1%	93%	77%	7.9
C206	C-13271/2	1/10/2023	1/5/2023	3/1/2023	98.1%	93%	93%	7.7
C206	C-13271/2	5/2/2023	3/1/2023	6/7/2023	97.5%	93%	98%	8.8
C206	C-13271/2	11/8/2023	8/25/2023	11/20/2023	97.8%	93%	93%	8.6
C206	C-13271/2	5/14/2024	3/4/2024	5/30/2024	98.4%	93%	96%	8.9
C207[c]	BLB00215	5/24/2022	3/24/2022	7/12/2022	97.3%	93%	92%	2.1 (East) 1.4 (West)
C207[c]	BLB00215	5/3/2023	3/1/2023	6/7/2023	97.8%	93%	89%	1.9 (East) 1.4 (West)

C207[c]	BLB00215	11/7/2023	8/25/2023	11/20/2023	98.9%	93%	97%	2.0 (East) 1.3 (West)
C207[c]	BLB00215	5/14/2024	3/4/2024	7/29/2024	98.9%	93%	98%	1.9 (East) 1.5 (West)

E. Continuous Compliance Requirements [40 CFR 63.6635 and 63.6640 (a)(e)]

1. The Permittee shall monitor and collect data to demonstrate continuous compliance for stationary 4SLB RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions, as specified in § 63.6635, for engines C202, C203, C204, C206 and C207.

2. The Permittee shall demonstrate continuous compliance with the emission limitations, operating limitations, and other requirements for stationary 4SLB RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions, as specified in § 63.6640, for engines C202, C203, C204, C206 and C207.

OBSERVATION: Pursuant to §63.6640(a) and MACT ZZZZ Table 6 (#1 & #4), MPLX shall (1) continuously collect inlet catalyst temperature data and reduce the data to 4-hour rolling averages and (2) measure the pressure drop across the catalyst once per month. Catalyst inlet temperature 4-hour rolling averages should be maintained within 450 - 1350°F and differential pressure across the catalyst should be within 2 inches of water from the baseline established during the performance test (at 100% load).

EPA observed the CPMS for engines C203, C204, C206 and C207 during its tour of the facility. (See Table 1 for engine parameters recorded during the inspection.) Catalyst inlet temperature and differential pressure across the catalyst were within the compliant range at the time of inspection. MPLX provided inlet catalyst temperature data and monthly pressure drop readings covering the period of July 1, 2022, through the date of inspection to EPA for review. EPA notes the rolling average listed temperatures in the compliant range.

All monthly differential pressure readings reported were within 2 inches of the baseline differential pressure. MPLX data clearly indicated performance test dates corresponding with baseline pressure information.

F. Notifications, Reports and Records [40 CFR 63.6645, 63.6650 and Table 7, 63.6655, and 63.6660]

1. The Permittee shall submit notifications as specified for stationary 4SLB RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions in § 63.6645 for engines C202, C203, C204, C206 and C207.

2. The Permittee shall submit reports as specified for stationary 4SLB RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions in § 63.6650 and Table 7 for engines C202, C203, C204, C206 and C207.

3. The Permittee shall keep records as specified in § 63.6655 for engines C202, C203, C204, C206 and C207.

4. The Permittee shall keep the records in the format and for the duration as specified in § 63.6660 for engines C202, C203, C204, C206 and C207.

OBSERVATION: Pursuant to §63.6645 and §63.7(g)(1), results of performance tests shall be submitted to the Administrator within 60 days of completion of the test, unless otherwise specified in a relevant standard or as approved otherwise in writing by the Administrator.

As required by 40 CFR §63.6650 and Table 7 to 40 CFR Part 63, Subpart ZZZZ, MPLX submitted the required semi-annual compliance reports for engines C202, C203, C204, C206, and C207. The reports contained details of any deviations from emissions and/or operating limitations and continuous reporting downtimes. See Table 9, below, for details of MACT ZZZZ reports submitted for the Wonsits Valley Compressor Station for the 2022 through present reporting periods.

Table 9: MACT ZZZZ Semi-Annual Compliance Reports (2022 – Present)

Reporting Period	Report Date	Notes
January 1 – June 30, 2022	7/31/22	• No APCD malfunctions or deviations reported. • No CPMS downtime reported.
July 1 – December 31, 2022	1/31/23	• During this period there was a brief instance when the CPMS for catalyst inlet temperature was inoperative for C203, C204 and C207 when SCADA lost communications (0.25 hour); see Subpart ZZZZ semiannual compliance report for the first half and second half of 2022.
January 1 – June 30, 2023	7/28/23	• No APCD malfunctions or deviations reported. • No CPMS out-of-control periods reported.
July 1 – December 31, 2023	1/30/24	• No APCD malfunctions or deviations reported. • No CPMS out-of-control periods reported. • No CPMS inoperative periods/downtime reported. • No deviations reported. • CPMS performance evaluation conducted the week of October 16, 2023.
January 1 – June 30, 2024	7/29/2024	• No APCD malfunctions reported. • No CPMS out-of-control periods reported. • No CPMS changes reported. • No CPMS inoperative periods/downtime reported. • No deviations reported.

[a] APCD = Air Pollution Control Device
[b] CPMS = Continuous Parametric Monitoring System

V. Requirements of Consent Decree Case No. 2:08-CV-00167-TS-PMV

A. Applicability

This source is subject to certain requirements of Consent Decree Case No. 2:08-CV-00167-TS-PMV (Consent Decree), filed and effective on July 3, 2012 and terminated on June 4, 2014. The Permittee shall comply with all applicable provisions of the Consent Decree as described in the Termination Clause, notwithstanding the conditions in this draft permit. ~~The Consent Decree in its entirety has been included in Appendix A.~~ The requirements for Wonsits Valley that survive termination are found in paragraphs 17, 19, 20 and 23.[4]

[4] According to EPA records, the Permittee demonstrated compliance with the initial control and monitoring device installation and performance testing requirements of the Consent Decree prior to the effective date of this permit.
[4] The previously installed backup combustor (unit C-2) was removed from the facility on April 13, 2022.

OBSERVATION: The Consent Decree was terminated on June 14, 2014. (See Appendix C for a copy of the signed termination order.) However, based on Section XVII of the Consent Decree, Paragraphs 17, 19, 20 and 23 shall expressly survive the termination of the Consent Decree.

OBSERVATION: Civil Action No. 2:23cv252 appears to have duplicative emission limits to Consent Decree Case No. 2:08-CV-00167-TS-PMVand therefore EPA only assessed compliance with those emission limitations during this compliance evaluation.

B. Requirements for the Glycol Dehydrator

[Consent Decree Case No. 2:08-CV-00167-TS-PMV, Paragraphs 17]

1. Requirements of Consent Decree Case No. 2:08-CV-00167-TS-PMV, Paragraph 17

   (a) The flare installed pursuant to Paragraph 15 of the Consent Decree shall achieve a 95% by weight or greater reduction of volatile organic compound (VOC) emissions for the glycol dehydrator process vent stream at all times except during periods of time when the pilot flame at the flare is off, the Permittee shall automatically shut-down the glycol dehydrator (D-1) glycol pumps and re-light the flare pilot flame prior to restarting the glycol pumps.

   (b) Compliance with 40 CFR 63.11(b), and with the associated monitoring and recordkeeping required in 40 CFR 63.773(d)(3)(i)(C), 63.774(b) and 63.774(e) shall be sufficient to determine compliance with the 95% VOC reduction requirement of Paragraph 17 of the Consent Decree.

   OBSERVATION: See Section III for a discussion of MACT HH requirements for the glycol dehydrator at the Wonsits Valley Compressor Station.

C. Requirements for the Condensate Storage Tank

[Consent Decree Case No. 2:08-CV-00167-TS-PMV, Paragraphs 19, 20]

1. Requirements of Consent Decree Case No. 2:08-CV-00167-TS-PMV, Paragraph 19

   (a) The Permittee shall, within 30 days of the Effective Date of the Consent Decree, connect the condensate storage tank, identified as T-1 in this permit, to an existing or new combustor at the facility.

   Note to Permittee: The EPA has determined that the requirements of Section V.C.1.a. of this permit have been satisfied. This section has been retained because the provision of the terminated CD was stated to live on in perpetuity.

   (b) The Permittee shall, within 60 days of the Effective Date of the Consent Decree, certify to the EPA that the design of the conveyance systems from the condensate storage tank to the combustor does not, under normal operating conditions, cause or contribute to a release of VOCs from the condensate storage tank through thief hatches or pressure relief valves.

   Note to Permittee: The EPA has determined that the requirements of Section V.C.1.b. of this permit have been satisfied. This section has been retained because the provision of the terminated CD was stated to live on in perpetuity.

   (c) The Permittee shall equip the combustor with thermocouples (or other heat sensing monitoring devices) to continuously monitor the presence of a pilot flame.

2. Requirements of Consent Decree Case No. 2:08-CV-00167-TS-PMV, Paragraph 20

(a) The Permittee shall monitor and record the presence of a pilot flame with a continuous recording device, such as a chart recorder or similar device.

OBSERVATION: Emissions from the condensate storage tank (Unit T-1) are routed to a Cimmaron combustor for control. The presence of a pilot flame is continuously monitored with a thermocouple. Records of thermocouple downtime information were provided to EPA upon request between July 1, 2022 and the inspection. MPLX notes "Bad Input" as pilot status which was reported to EPA, see Table 11 below for thermocouple records provided during for six month and annual reporting periods.

D. Requirements for RICE

[Consent Decree Case No. 2:08-CV-00167-TS-PMV, Paragraph 23]

1. Requirements of Consent Decree Case No. 2:08-CV-00167-TS-PMV, Paragraph 23

For RICE a site rating of 500 hp or greater operated at the facility, identified as engines C202, C203, C204, C206 and C207, the Permittee shall comply with the requirements specified below:

(a) Emissions Control:

(i) The Permittee has installed and is operating an oxidation catalyst control device on each lean burn RICE. The four existing lean burn RICE at Wonsits Valley, identified as C202, C203, C204 and C207, shall not exceed 1.0 gram per horsepower hour (g/hp-hr) for NO_X (nitrogen oxides) and 1.0 g/hp-hr for CO (carbon monoxide) and C206 shall not exceed 1.3 g/hp-hr for NO_X and 1.0 g/hp-hr for CO in this permit.

OBSERVATION: The engines currently installed, are equipped with an AFR and NSCR control system. Results of semi-annual performance tests for NO_X and CO conducted since the last full compliance evaluation are within the allowable limits. See Table 10, below.

(b) Emissions Controls Maintenance:

Any oxygen sensors in use shall be replaced within 2,000 hours of engine run time.

OBSERVATION: According to information provided by MPLX in previous inspection reports, the engines are 4SLB and do not use oxygen sensors.

(c) Performance Testing for NO_X and CO:

(i) Not later than 180 days after the Effective Date of the Consent Decree, the Permittee shall conduct initial performance tests for NO_X and CO emissions, on each RICE, using the test protocol selected from the list in paragraph iv below.

Note to Permittee: The EPA has determined that the requirements of Section V.D.1.c.i. of this permit have been satisfied. This section has been retained because the provision of the terminated CD was stated to live on in perpetuity.

(ii) The Permittee shall retest each reciprocating internal combustion engine semi-annually using the test protocol developed from the test methods specified above. The Permittee shall submit to the EPA the test results for NO_X and CO with the respective semiannual report required in Section VI.B.1. of this permit that corresponds with the reporting period within which the test was conducted.

(iii) Performance tests must be conducted at any load condition within plus or minus 10 % of 100 % load unless the reciprocating internal combustion engine cannot achieve plus or minus 10 % of 100 % load at the time of the test. Under such circumstances, the reciprocating internal combustion engine shall be tested at maximum achievable load, and the differential pressure across the catalyst shall be monitored and shall be maintained consistent with operating limitations in 40 CFR part 63, subpart ZZZZ. If the reciprocating internal combustion engine load is increased by 20% or greater averaged over a 30-day period commencing within 60 days of the last test, then the reciprocating internal combustion engine shall be re-tested at the newly achievable maximum load and the corresponding differential pressure established. For the purposes of this provision regarding engine load during and after performance testing, the Permittee shall monitor and record load at each engine.

(iv) The Permittee shall select among the following test methods: 40 CFR part 60, appendix A, Method 1 or 1A - Sampling port location and number of traverse points; 40 CFR part 60, appendix A, Method 3, 3A or 3B - O_2 (oxygen) concentration at inlet and outlet; 40 CFR part 60, appendix A, Method 4 - Moisture Content; 40 CFR part 60, appendix A, Method 7E – Determination of nitrogen oxides emissions; or 40 CFR part 60, appendix A, Method 10 – Determination of carbon monoxide emissions. Optionally, the Permittee may use 40 CFR part 60, Appendix A, Method 320, for testing NOx and CO in lieu of Methods 7E and 10, respectively.[5]

[Explanatory note: According to information provided by the Permittee, the engines currently operating as of the issuance of this Part 71 Permit, identified as engines C202, C203, C204, C206 and C207 do not use oxygen sensors. Requirements 1.(b) is included from the Consent Decree Case No. 2:08-CV-00167-TS-PMV, Paragraph 23, to accommodate any allowed off-permit change(s) to install oxygen sensors on any of the engines.]

OBSERVATION: See Section IV for observations regarding MACT ZZZZ requirements. Engine loads are monitored via a SCADA system.

OBSERVATION: Each of the lean-burn reciprocating internal combustion engines subject to the CD requirements are equipped with an oxidation catalyst that operates as a control device. Results of semi-annual performance tests for NO_x and CO conducted from 2022 to present are displayed in Table 10 below.

Table 10: Results of Semi-Annual NO_x and CO Performance Tests (2022 – Present)

Emission Unit	Test Date(s)	Notification Rcvd	Report Rcvd	Avg. NO_x (g/hp-hr)	NO_x Limit (g/hp-hr)	Avg. CO (g/hp-hr)	CO Limit (g/hp-hr)	Avg. Catalyst ΔP (inches H_2O)	Avg. Pre-Catalyst Exhaust Gas Temp (°F)	Avg. Load
C202	5/26/2022	3/24/2022	7/12/2022	0.83	1.0	0.00	1.0	6.7	800	80.7%
C202	11/30/2022	9/28/2022	1/6/2023	0.65	1.0	0.01	1.0	6.5	807	82.7%
C202	5/4/2023	3/1/2023	6/7/2023	0.54	1.0	0.01	1.0	7.4	714	88.0%

[5] On July 23, 2021, the U.S. Environmental Protection Agency, Department of Justice and MPLX, LP agreed to modify the terms of surviving Paragraph 23 of a Consent Decree (United States v. Questar Gas Management Co., Case No. 2:09-CV-00167-TS-PMV) to effect the following change: MPLX may use Test Method 320 of 40 CFR part 63, appendix A (Method 320) in lieu of Method 7E of 40 CFR part 60 (Method 7E) and Method 10 of 40 CFR part 60 (Method 10) for the measurement of NOx and CO, respectively, at Wonsits Valley Compressor Station.

C202	12/4/2023	8/25/2023	12/21/2023	0.29	1.0	0.00	1.0	6.8	782	87.7%
C202	5/14/2024	3/4/2024	5/30/2024	0.40	1.0	0.00	1.0	6.9	695	88.0%
C203	5/25/2022	3/24/2022	7/12/2022	0.61	1.0	0.01	1.0	7	787	87.3%
C203	11/30/2022	9/28/2022	1/6/2023	0.55	1.0	0.00	1.0	7.1	784	86.0%
C203	5/1/2023	3/1/2023	6/7/2023	0.51	1.0	0.01	1.0	7.8	768	96.7%
C203	11/6/2023	8/25/2023	11/20/2023	0.58	1.0	0.00	1.0	7.8	693	93.7%
C203	5/15/2024	3/4/2024	5/30/2024	0.82	1.0	0.00	1.0	7.4	798	90.0%
C204	5/25/2022	3/24/2022	7/12/2022	0.81	1.0	0.01	1.0	6.8	821	79%
C204	11/30/2022	9/28/2022	1/6/2023	0.53	1.0	0.00	1.0	5.8	792	82%
C204	1/10/2023	12/7/2022	3/1/2023	0.50	1.0	0.00	1.0	6.5	817	87%
C204	5/1/2023	3/1/2023	6/7/2023	0.40	1.0	0.01	1.0	7.1	773	100%
C204	11/7/2023	8/25/2023	11/20/2023	0.44	1.0	0.00	1.0	7.2	701	92%
C204	5/13/2024	3/4/2024	5/30/2024	0.71	1.0	0.00	1.0	6.9	675	85%
C206	5/26/2022	3/24/2022	7/12/2022	0.47	1.3	0.06	1.0	7.9	750	77%
C206	11/30/2022	9/28/2022	1/6/2023	0.41	1.3	0.06	1.0	7.9	746	96%
C206	1/10/2023	1/5/2023	3/1/2023	0.42	1.3	0.05	1.0	7.7	740	93%
C206	5/2/2023	3/1/2023	6/7/2023	0.73	1.3	0.05	1.0	8.8	749	98%
C206	11/8/2023	8/25/2023	11/20/2023	0.51	1.3	0.05	1.0	8.6	680	93%
C206	5/14/2024	3/4/2024	5/30/2024	0.75	1.3	0.03	1.0	8.9	684	96%
C207[c]	5/24/2022	3/24/2022	7/12/2022	0.54	1.0	0.05	1.0	2.1 (East) 1.4 (West)	763 (East) 667 (West)	92%
C207[c]	11/29/2022	9/28/2022	1/6/2023	0.57	1	0.04	1	2.0 (East) 1.3 (West)	764 (East) 646 (West)	93%
C207[c]	5/3/2023	3/1/2023	6/7/2023	0.68	1.0	0.05	1.0	1.9 (East) 1.4 (West)	778 (East) 671 (West)	89%
C207[c]	11/7/2023	8/25/2023	11/20/2023	0.68	1.0	0.05	1.0	1.9 (East) 1.3 (West)	775 (East) 677 (West)	97%
C207[c]	5/14/2024	3/4/2024	5/30/2024	0.65	1.0	0.02	1.0	1.9 (East) 1.5 (West)	748 (East) 631 (West)	98%

OBSERVATION:As previously discussed, engine loads are monitored and recorded via a SCADA system.

[a] ΔP = pressure drop

[b] Test results indicate combined emissions from both East (Left) and West (Right) Bank stacks.

[c] Test does not meet the requirements of MACT ZZZZ, as the test was stopped after only one test run due to VOC emission results indicating an exceedance of the NSPS JJJJ limits for Engine C207.

VI. Facility-Wide Requirements [40 CFR 71.6(a)(1)]

Conditions in this section of this permit apply to all emissions units located at the source, including any units not specifically listed in Table 2 of the Facility Emission Points section of this permit.

A. Recordkeeping Requirements [40 CFR 71.6(a)(3)(ii)]

The Permittee shall comply with the following generally applicable recordkeeping requirements:

1. If the Permittee determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more HAPs is not subject to a relevant standard or other requirement established under 40 CFR part 63, the Permittee shall keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination shall include an analysis (or other information) that demonstrates why the Permittee believes the source is unaffected (e.g., because the source is an area source). [40 CFR 63.10(b)(3)]

2. Records shall be kept of off permit changes, as required by the Off Permit Changes section (VII.O.) of this permit.

OBSERVATION: Records were provided to EPA inspectors upon request.

B. Reporting Requirements [40 CFR 71.6(a)(3)(iii)]

1. The Permittee shall submit to the EPA all reports of any required monitoring under this permit semiannually. The first report has already been submitted for this facility. Reports shall be submitted semi-annually, by January 31st and July 31st of each year. The report due on January 31st shall cover the 6-month period ending on the last day of December before the report is due. The report due on July 31st shall cover the 6-month period ending on the last day of June before the report is due. All instances of deviations from permit requirements shall be clearly identified in such reports. All required reports shall be certified by a responsible official consistent with the Submissions section of this permit.

[Explanatory note: To help Part 71 Permittees meet reporting responsibilities, the EPA has developed a form "SIXMON" for 6-month monitoring reports. The form may be found on the EPA's website at: https://www.epa.gov/title-v-operating-permits/epa-issued-operating-permits]

OBSERVATION: The following semi-annual (SIXMON) reports have been submitted to EPA for the Wonsits Valley Compressor Station since the previous full compliance evaluation.

Table 11: Title V Semi-Annual (SIXMON) and Title V Annual Compliance Certifications for Wonsits Valley Compressor Station

Reporting Period	Report Date	Report Rcvd	Report Type	Notes
January 1 – June 30, 2022	7/31/22	7/31/22	SIXMON	• MACT ZZZZ: Annual performance testing for C202, C203, C204, C206, and C207 conducted in May 2022. • NSPS JJJJ: Annual performance testing for C202, C203, C204, C206, and C207 conducted in May 2022. • CD: No deviations reported. 17.7 combustor pilot downtime and 58 hours with "bad input."
January 1 – December 31, 2022	1/31/23	1/31/2023	TVACC	• MACT ZZZZ: During this period there was a brief instance when the CPMS for catalyst inlet temperature was inoperative for C203, C204 and C207 when SCADA lost communications (0.25 hour); see Subpart ZZZZ semiannual compliance report for the first half and second half of 2022. • CD Requirements: There were events for 78 hours when the SCADA system was not able to collect pilot data (missing data or loss of communications). • Facility-wide: Reported continuous compliance with all other Title V, MACT and NSPS provisions.
July 1 – December 31, 2022	1/31/23	1/31/2023	SIXMON	• MACT HH: No deviations reported, see MACT HH reports above. • MACT ZZZZ: 0.25 total hours bad catalyst inlet temp data for 3 engines. • CD Requirements: No deviations reported

January 1 – June 30, 2023	7/28/23	7/28/23	SIXMON	• Performance testing for MACT ZZZZ, NSPS JJJJ, and CD requirements conducted on C202, C203, C204, C206, and C207 in May 2023. • During this reporting period, there were instances where the combustor was not in operation to control condensate storage emissions. • Load data for C206 not collected until 2/5/2020 due to SCADA data collection issues. • MACT HH: 4 hrs of flare pilot downtime when dehy operating. • Tank Combustor Monitoring: 3 hours where tank combustor status indicated off; total operating time = 4,368.0 hrs
January 1 – December 31, 2023	1/30/24	1/30/24	TVACC	• MPLX reported numerous hours where the combustor controlling storage tank subject to the CD was not in operation.
July 1 – December 31, 2023	1/30/24	1/30/24	SIXMON	• MACT HH: No deviations reported • MACT ZZZZ: Reported CPMS Monitoring conducted. • NSPS JJJJ: No performance testing on engines C202, C203, C204, C206, and C207. • CD Requirements: Semi-annual NOX and CO performance testing on C202, C203, C204, C206, and C207 conducted in November and December 2023. MPLX reported 8.5 hours where the combustor controlling storage tank subject to the CD was not in operation.
January 1 – June 30, 2024	7/29/2024	7/29/2024	SIXMON	• MACT HH: No deviations reported. • MACT ZZZZ and NSPS JJJJ: Annual performance testing on engines C202, C203, C204, C206, and C207 conducted in May 2024. • CD Requirements: Semi-annual NOX and CO testing conducted on C202, C203, C204, C206, and C207 in May 2024. • Less than 10 total hours of tank combustor downtime reported.

2. "Deviation" means any situation in which an emissions unit fails to meet a permit term or condition. A deviation is not always a violation. A deviation can be determined by observation or through review of data obtained from any testing, monitoring or recordkeeping established in accordance with § 71.6(a)(3)(i) and (a)(3)(ii). For a situation lasting more than 24 hours which constitutes a deviation, each 24-hour period is considered a separate deviation. Included in the meaning of deviation are any of the following:

   (a) A situation where emissions exceed an emission limitation or standard;

   (b) A situation where process or emissions control device parameter values indicate that an emission limitation or standard has not been met; or

   (c) A situation in which observations or data collected demonstrate noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit.

3. The Permittee shall promptly report to the EPA deviations from permit requirements, including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any

corrective actions or preventive measures taken. "Prompt" is defined as follows:

(a) Any definition of "prompt" or a specific time frame for reporting deviations provided in an underlying applicable requirement as identified in this permit.

(b) Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations will be submitted based on the following schedule:

(i) For emissions of a HAP or a toxic air pollutant (as identified in the applicable regulation) that continue for more than an hour in excess of permit requirements, the report shall be made within 24 hours of the occurrence.
(ii) For emissions of any regulated air pollutant, excluding a HAP or a toxic air pollutant that continues for more than 2 hours in excess of permit requirements, the report shall be made within 48 hours.
(iii) For all other deviations from permit requirements, the report shall be submitted with the semi-annual monitoring report.

(c) If any of the conditions in (i) or (ii) of paragraph (b) above are met, the Permittee shall notify the EPA by telephone (1-800-227-6312), facsimile (303-312-6409), or by email to r8airreportenforcement@epa.gov based on the timetables listed above. *[Notification shall specify that this notification is a deviation report for a Part 71 permit].* A written notice, certified consistent with the Submissions section of this permit shall be submitted within ten working days of the occurrence. All deviations reported under this section shall also be identified in the 6-month report required under Condition 1 in this section of this permit.

[Explanatory note: To help Part 71 Permittees meet reporting responsibilities, the EPA has developed a form "PDR" for prompt deviation reporting. The form may be found on the EPA's website at: https://www.epa.gov/title-v-operating-permits/epa-issued-operating-permits]

OBSERVATION: Deviations have been reported on Semi-Annual Emissions Reports and Annual Compliance Certifications as detailed in Tables 11.

VII. General Provisions

A. Annual Fee Payment [40 CFR 71.9]

1. The Permittee shall pay an annual permit fee in accordance with the procedures outlined below.

2. The Permittee shall pay the annual permit fee each year no later than April 1st. The fee shall cover the previous calendar year.

3. The fee payment shall be in United States currency and shall be paid by money order, bank draft, certified check, corporate check, or electronic funds transfer payable to the order of the U.S. Environmental Protection Agency.

4. The Permittee shall send fee payment and a completed fee filing form to:

For regular U.S. Postal Service mail (FedEx, Airborne, DHL, and UPS)	**For non-U.S. Postal Service express mail**
U.S. Environmental Protection Agency FOIA and Miscellaneous Payments Cincinnati Finance Center	U.S. Bank Government Lockbox 979078 U.S. EPA FOIA & Misc. Payments

P.O. Box 979078
St. Louis, Missouri 63197-9000

1005 Convention Plaza SL-MO-C2-GL
St. Louis, Missouri 63101

5. The Permittee shall send an updated fee calculation worksheet form and a photocopy of each fee payment check (or other confirmation of actual fee paid) submitted annually by the same deadline as required for fee payment to the address listed in the Submissions section of this permit.

[Explanatory note: The fee filing form "FF" and the fee calculation worksheet form "FEE" may be found on the EPA's website at: https://www.epa.gov/title-v-operating-permits/epa-issued-operating-permits*]*

6. Basis for calculating annual fee:

   (a) The annual emissions fee shall be calculated by multiplying the total tons of actual emissions of all "regulated pollutants (for fee calculation)" emitted from the source by the presumptive emissions fee (in dollars per ton) in effect at the time of calculation.

      (i) "Actual emissions" means the actual rate of emissions in tpy of any regulated pollutant (for fee calculation) emitted from a Part 71 source over the preceding calendar year. Actual emissions shall be calculated using each emissions unit's actual operating hours, production rates, in-place control equipment, and types of materials processed, stored, or combusted during the preceding calendar year.
      (ii) Actual emissions shall be computed using methods required by the permit for determining compliance, such as monitoring or source testing data.
      (iii) If actual emissions cannot be determined using the compliance methods in the permit, the Permittee shall use other federally recognized procedures.

[Explanatory note: The presumptive fee amount is revised each calendar year to account for inflation, and it is available from the EPA prior to the start of each calendar year.]

   (b) The annual emissions fee shall be increased by a greenhouse gas (GHG) fee adjustment for any source that has initiated an activity listed in table at § 71.9(c)(8) since the fee was last paid. The GHG fee adjustment shall be equal to the set fee provided in the table at § 71.9(c)(8) for each activity that has been initiated since the fee was last paid.

   (c) The Permittee shall exclude the following emissions from the calculation of fees:

      (i) The amount of actual emissions of each regulated pollutant (for fee calculation) that the source emits in excess of 4,000 tpy;
      (ii) Actual emissions of any regulated pollutant (for fee calculation) already included in the fee calculation; and
      (iii) The quantity of actual emissions (for fee calculation) of insignificant activities [defined in 40 CFR 71.5(c)(11)(i)] or of insignificant emissions levels from emissions at the source identified in the Permittee's application pursuant to 40 CFR 71.5(c)(11)(ii).

7. Fee calculation worksheets shall be certified as to truth, accuracy, and completeness by a responsible official.

[Explanatory note: The fee calculation worksheet form already incorporates a section to help you meet this responsibility.]

8. The Permittee shall retain fee calculation worksheets and other emissions-related data used to determine fee payment for 5 years following submittal of fee payment. [Emission-related data include, for example, emissions-related forms provided by the EPA and used by the Permittee for fee calculation

purposes, emissions-related spreadsheets, and emissions-related data, such as records of emissions monitoring data and related support information required to be kept in accordance with 40 CFR 71.6(a)(3)(ii).]

9. Failure of the Permittee to pay fees in a timely manner shall subject the Permittee to assessment of penalties and interest in accordance with 40 CFR 71.9(l).

10. When notified by the EPA of underpayment of fees, the Permittee shall remit full payment within 30 days of receipt of notification.

11. A Permittee who thinks an EPA-assessed fee is in error and who wishes to challenge such fee, shall provide a written explanation of the alleged error to the EPA along with full payment of the EPA assessed fee.

OBSERVATION: Annual fees received for Wonsits for the 2022 and 2023 reporting years are displayed in Table 12, below.

Table 12: Annual Fees Received for the Wonsits Valley Compressor Station

Date Received	Reporting Year	Fee Paid
March 30, 2023	2022	$5,571.52
March 30, 2024	2023	$8,478.40

B. Annual Emissions Inventory [40 CFR 71.9(h)(1) and (2)]

1. The Permittee shall submit an annual emissions report of its actual emissions for both criteria pollutants and regulated HAPs for this source for the preceding calendar year for fee assessment purposes. The annual emissions report shall be certified by a responsible official and shall be submitted each year to the EPA by April 1st.

2. The annual emissions report shall be submitted to the EPA at the address listed in the Submissions section of this permit.

OBSERVATION: Annual emissions reports received by the EPA for Wonsits Valley are displayed in Table 13, below. Reports for calendar years 2019, 2020 and 2021 were received on March 26, 2020, March 30, 2021, and March 30, 2022 respectively.

Table 13: Annual Emissions Reported for the Wonsits Valley Compressor Station

Pollutant	Actual Emissions (tpy)	
	2022	2023
NO_x	78.8	94.1
VOC	8.1	40.2
SO_2	0.4	0.5
PM_{10}	4.7	5.5
Total HAPs	17.1	14.5

[Explanatory note: An annual emissions report, required at the same time as the fee calculation worksheet by 40 CFR 71.9(h), has been incorporated into the fee calculation worksheet form as a convenience.]

C. Compliance Requirements [40 CFR 71.6(a)(6), Section 113(a) and 113(e)(1) of the CAA, and 40 CFR 51.212, 52.12, 52.33, 60.11(g), 61.12]

1. Compliance with the Permit

(a) The Permittee must comply with all conditions of this Part 71 permit. Any permit noncompliance constitutes a violation of the CAA and is grounds for enforcement action;

(b) For permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

(c) It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(d) For the purpose of submitting compliance certifications in accordance with §71.6(c)(5) or establishing whether or not a person has violated or is in violation of any requirement of this permit, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

2. Compliance Schedule [40 CFR 71.5(c)(8)(iii)]

(a) For applicable requirements with which the source is in compliance, the source will continue to comply with such requirements.

(b) For applicable requirements that will become effective during the permit term, the source shall meet such requirements on a timely basis.

3. Compliance Certifications [40 CFR 71.6(c)(5)]

(a) The Permittee shall submit to the EPA a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices annually by January 31st, and shall cover the same 12-month period as the two consecutive semi-annual monitoring reports.

[Explanatory note: To help Part 71 Permittees meet reporting responsibilities, the EPA has developed a reporting form for annual compliance certifications. The form may be found on the EPA's website at: https://www.epa.gov/title-v-operating-permits/epa-issued-operating-permits *]*

(b) The compliance certification shall be certified as to truth, accuracy, and completeness by a responsible official consistent with 40 CFR 71.5(d).

(c) The certification shall include the following:

(i) Identification of each permit term or condition that is the basis of the certification;
(ii) The identification of the method(s) or other means used for determining the compliance status of each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required in this permit. If necessary, the Permittee also shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the CAA, which prohibits knowingly making a false certification or omitting material information;

(iii) The status of compliance with each term and condition of the permit for the period covered by the certification based on the method or means designated in (ii) above. The certification shall identify each deviation and take it into account in the compliance certification;
(iv) Such other facts as the EPA may require to determine the compliance status of the source; and
(v) Whether compliance with each permit term was continuous or intermittent.

OBSERVATION: Title V Annual Compliance Certifications (TVACCs) submitted since the previous full compliance evaluation are shown in Table 11.

APPENDIX A: Site Overview



APPENDIX B: Photo Log

File Name	Description	Photographer
MOV_3574	Emissions during maintenance on dehydration unit condensables tank.	M. Stovern
DC_3575	Photo of BTEX knockout tanks open due to maintenance, truck was not vapor balancing emissions.	M. Stovern

APPENDIX C: Consent Decree Termination

IN THE UNITED STATES JUDICIAL DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA, Plaintiff, FRANCES M. POOWEGUP, IRENE C. CUCH AND PHILLIP CHIMBURAS, Plaintiff-Intervenor, v. QEP FIELD SERVICES, f/k/a QUESTAR GAS MANAGEMENT COMPANY Defendant.	Case No. 2:08-CV-167 TS District Judge Ted Stewart

ORDER

Upon consideration of Defendant, QEP Field Services Company's Motion To Terminate the Consent Decree, it is hereby ordered that the Motion is Granted. The Consent Decree entered on July 3, 2012 is hereby terminated.

ENTERED this 4th day of June, 2014.

BY THE COURT:

Ted Stewart
United States District Judge