

**MPLX – Walker Hollow Compressor Station**  
**Full Compliance Evaluation (FCE)**  
**On-Site Inspection**

|                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|---------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Inspection Date:</b>               | September 18, 2024                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Inspection Report Date:</b>        | December 3, 2024                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>EPA Representatives:</b>           | Colin LeCortz, Environmental Scientist, US EPA Region 8<br>Mike Stovern, Environmental Scientist, US EPA Region 8<br>Chris Andrade, Environmental Scientist, US EPA Region 8<br>James Floyd, US EPA Region 8                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Tribal Representatives:</b>        | Lonnie Favel<br>Alverna Nelson                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Company Representatives:</b>       | Joshua Hirschi<br>AJ Thompson<br>Jared Holmes<br>Bill Allen<br>Joe Lopez<br>Chris Calvert<br>David VanLeuben                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Inspection Report Prepared By:</b> | Chris Andrade, Environmental Scientist, US EPA Region 8                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Inspection Report Reviewed By:</b> | Scott Patefield, Manager, Air & Toxics Enforcement Branch<br>US EPA Region 8                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Last Inspection:</b>               | September 2, 2021                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Operating Status:</b>              | Operational                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Applicable Requirements:</b>       | Title V<br>40 CFR Part 60, Subpart KKKK: Standards of Performance for<br>Stationary Combustion Turbines (NSPS KKKK)<br>40 CFR Part 60, Subpart OOOOa: Standards of Performance for<br>Crude Oil and Natural Gas Facilities for which Construction,<br>Modification or Reconstruction Commenced after September 18,<br>2015 (NSPS OOOOa)<br>40 CFR Part 60, Subpart OOOOb: Standards of Performance for<br>Crude Oil and Natural Gas Facilities for Which Construction,<br>Modification or Reconstruction Commenced After December 6,<br>2022 (NSPS OOOOb)<br>40 CFR Part 63, Subpart HH: National Emissions Standards for<br>Hazardous Pollutants from Oil and Natural Gas Production<br>Facilities (MACT HH) |

Permit Number: V-UO-000979-2017.00  
Replaces Permit No.: N/A (initial permit)

Issue Date: June 12, 2018  
Effective Date: July 12, 2018  
Expiration Date: July 12, 2023

### **Facility Information and Emission Unit Identification**

Parent Company Name: Marathon Petroleum Corporation (MPLX)  
Mailing Address: 200 East Hardin Street, Findlay, Ohio 45840  
Facility Contact: Josh Hirschi, Environmental Engineer  
(435) 781-7489  
Facility Operator & Name: MPLX – Walker Hollow Compressor Station  
Facility Location: Latitude 40.1851, Longitude -109.3040  
County, State: Uintah, Utah  
Reservation: Uintah and Ouray Indian Reservation  
Tribe: Ute Indian Tribe  
Responsible Official: Darren Snow, Northwest Region Director  
SIC Code: 1311 – Crude Petroleum and Natural Gas  
ICIS ID: 49-047-01025  
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) and does not apply to the Walker Hollow Compressor Station.

### **Inspection Findings/Areas of Concern**

No areas of concern are noted at this time.

### **Compliance Assistance**

No compliance assistance was provided as a result of this full compliance evaluation.

### **Description of Operations**

Walker Hollow receives a comingled liquid stream containing natural gas, condensate, and water from the field via pipeline and enters the facility first at an onsite slug catcher. The slug catcher dumps at a controlled rate to a 3-phase separator, which operates at 30 pounds per square inch gauge (psig). Flash gas generated from the separator is recovered in one of four Aerial Model JGP/1 electrically-driven flash gas reciprocating compressors (emissions units C-103, C-104, C-203, and C-204) and recycled back to the inlet slug catcher. The stream in the separator is divided into both a natural gas and a liquids phase.

Natural gas that exits the separator flows to four (4) compressors, which compress the gas before it enters either of the triethylene glycol (TEG) dehydration units (emissions units SK-101, SK-121, and SK-201). The emissions for the TEG dehydration units are routed to a Vapor Recovery Unit (VRU), which sends the recovered vapors back to the 3-phase separator. The compressors are powered by a Solar Turbines Mars 100 turbines (emissions units GT-101 and GT-121) and Solar Turbines Titan 130 turbines (GT-201 and GT-221). There are four 1<sup>st</sup> Stage compressors (C-101, C-121, C-201, and C-221) and four 2<sup>nd</sup> stage compressors (C-102, C-122, C-202, and C-222) associated with the turbines. The turbines are fueled with dehydrated natural gas from the facility. The natural gas enters the dehydration units and is bubbled up through lean 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 of 7 pounds per million standard cubic foot (lb/MMscf). The pipeline-quality natural gas then exits the contactor, is metered and then routed off site. The rich TEG exits the contactor and is regenerated using heat in a vessel called a reboiler. A natural gas-fired heater heats the TEG to a set temperature that boils impurities out of the TEG. The vapors from the reboiler are routed to the emissions control device, an open flare (FL-101). A backup flare (FL-201) is present for when the VRU is not operating. The regenerated lean TEG is circulated back to the contactor.

Condensate (liquid) exiting the separator is pumped from Walker Hollow via four (4) condensate pumps. Produced water exiting the separator is routed to four (4) 500-barrel (bbl) produced water atmospheric storage tanks at the facility. Liquids containing benzene, toluene, ethylbenzene, and xylenes (BTEX) from dehydration towers SK-101, SK-121 and SK-201 are collected in a BTEX condenser and are also pumped to these four (4) tanks. Once adequate volumes are accumulated in the storage tanks, the produced water is trucked off location for further processing or treatment.

### **General Inspection Observations and Commentary**

On September 18, 2024 at 2:45 PM, EPA representatives Colin LeCortz, Mike Stoven, Chris Andrade, and James Floyd and Ute Tribe Air Program representatives Lonnie Favel and Alverna Nelson met with MPLX representatives Joshua Hirschi, AJ Thompson, Jared Holmes, Bill Allen, Joe Lopez, Chris Calvert, and David VanLeuben at the Walker Hollow Compressor station in Vernal, Utah. An opening conference was conducted, during which EPA inspectors presented credentials. A safety orientation was also completed, and EPA inspectors informed MPLX representatives that the site would be surveyed using a forward looking infrared (FLIR) camera for which a hot work permit was generated and signed by all personnel on site.

The Walker Hollow Compressor Station was not operated from November 2016 until January 27, 2022, when the turbine and other associated equipment were briefly restarted. The facility resumed operations on March 25, 2022.

Since the previous inspection in 2018, turbine GT-101 has been replaced and three new turbines have been added (GT-121, GT-201, and GT 221). There is also two additional dehydration towers (SK-121 and SK-201), two compressors (C-203 and C-204), four 1<sup>st</sup> stage compressors (C-101, C-121, C-201, and C-221), four 2<sup>nd</sup> stage compressors (C-102, C-122, C-202, and C-222), and four produced water and BTEX storage tanks (TK-101, TK-102, TK-201, and TK-202) that are new since the previous inspection.

The facility has online power and, according to MPLX representatives, the facility operates on instrument air powered pneumatic devices. During the inspection Units GT-101 and GT-221 were operating while units GT-121 and GT-201 were off. Condensate generated at the facility is trucked off-site to Koda.

Emissions from the manway at the bottom of the dehydration tower were detected by the FLIR. The emissions were coming from the natural gas side of the tower. Video MOV\_3576 was recorded by Mr. Stovern. An email was sent on November 20, 2024 to Mr. Hirshi from MPLX. A response was received on November 26, 2024 stating that the leak was repaired on September 21, 2024 and verified with an OGI camera on September 23, 2024.

EPA and Ute Tribe representatives met with MPLX representatives for a brief closing conference. A confidential business information (CBI) warning was presented to MPLX representatives, and no CBI was claimed. EPA and tribal staff departed the facility at 4:00 PM. Emails to request relevant compliance-related information and records were sent to Mr. Hirshi on October 1, 2024, October 29, 2024, and November 20, 2024. Mr. Hirshi provided the requested information to EPA via email on October 12, 2024, November 7, 2024, and November 26, 2024 respectively.

### **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.

See Table 1, below, for facility-wide and emission unit-specific potential to emit data included in the Statement of Basis for Permit No. V-UO-000979-2017.00 for the Walker Hollow Compressor Station. The PTE totals below include reductions from legally and practically enforceable requirements set forth in the Title V permit. Table 1 also contains the total PTE for all insignificant emissions units. The 2024 inspection identified three new engines, two new dehydrators, two new compressors, and four storage tanks on site. Updated PTE calculations will come with the next updated Title V Permit.

**Table 1: Potential to Emit in Tons Per Year (tpy)  
MPLX Walker Hollow Compressor Station**

| <b>Emission Unit Id.</b>            | <b>Regulated Air Pollutants (tpy)</b> |             |             |                        |                       |                  |
|-------------------------------------|---------------------------------------|-------------|-------------|------------------------|-----------------------|------------------|
|                                     | <b>NO<sub>x</sub></b>                 | <b>CO</b>   | <b>VOC</b>  | <b>PM<sub>10</sub></b> | <b>SO<sub>2</sub></b> | <b>Total HAP</b> |
| <b>GT-101</b>                       | 40.3                                  | 25.1        | 2.7         | 2.7                    | 0.09                  | 0.4              |
| <b>SK-101</b>                       | -                                     | -           | 87.7        | -                      | -                     | 3.63             |
| <b>EL</b>                           | -                                     | -           | 2.74        | -                      | -                     | 0.01             |
| <b>Insignificant Emission Units</b> | 0.03                                  | 0.38        | 0.56        | 0.03                   | -                     | 0.9              |
| <b>TOTAL</b>                        | <b>40.3</b>                           | <b>25.4</b> | <b>93.7</b> | <b>2.7</b>             | <b>0.1</b>            | <b>4.9</b>       |

NO<sub>x</sub> = oxides of nitrogen; CO = carbon monoxide; VOC = volatile organic compounds; PM<sub>10</sub> = particulate matter ≤ 10 µm in diameter; SO<sub>2</sub> = sulfur dioxide; HAP = hazardous air pollutants

“Units in existing permit, see below on additional equipment included in the new permit application”

**Permit Number V-UO-000979-2017.00 Requirements and Compliance Status**

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

**I. Facility Emission Points and Unit-Specific Information****Table 2: Source Emission Points**

| <b>Emission Unit ID</b> | <b>Description</b>                                                                                                                                                                                                               | <b>Control Equipment</b>                                                                                                    |
|-------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|
| GT-101**<br>GT-121**    | 91.7 MMBtu/h*, natural gas-fired turbine<br>Solar Turbines Mars 100<br><br>Serial Number: OHJ23-M4538    Installed: April 23, 2024<br>Serial Number: OHG22-M7701    Installed: June 28, 2023                                     | None                                                                                                                        |
| GT-201**<br>GT-221**    | 132.4 MMBtu/h*, natural gas-fired turbine<br>Solar Turbines Titan 130-23502S<br><br>Serial Number: 1274L    Installed: Dec 17, 2023<br>Serial Number: 1313L    Installed: Jan 5, 2024                                            | None                                                                                                                        |
| SK-101                  | 65 MMscfd* Dehydration Unit<br>TEG Regenerator and Flash Separator Vents<br><br>Serial Number: N/A    Installed: 10/10/2016                                                                                                      | John Zink Low-Pressure Flare (FL-101), Vapor Recovery Unit, Backup Flare for Recovery Unit Zeeco AFDS-4/20-40 BTEX (FL-201) |
| SK-121**                | 80 MMscfd* Dehydration Unit<br>TEG Regenerator and Flash Separator Vents<br><br>Serial Number: N/A    Installed: 7/1/2023                                                                                                        | John Zink Low-Pressure Flare (FL-101), Vapor Recovery Unit, Backup Flare for Recovery Unit Zeeco AFDS-4/20-40 BTEX (FL-201) |
| SK-201**                | 200 MMscfd* Dehydration Unit<br>TEG Regenerator and Flash Separator Vents, Vapor Recovery Unit, Backup Enclosed Combustor.<br><br>Serial Number: N/A    Installed: 12/16/2023                                                    | John Zink Low-Pressure Flare (FL-101), Vapor Recovery Unit, Backup Flare for Recovery Unit Zeeco AFDS-4/20-40 BTEX (FL-201) |
| C-103<br>C-104          | Arial Model JGP/1 Electrically-driven Reciprocating Compressor<br>Emissions are fugitive emissions leaks from the rod packing.<br><br>Serial Number: N/A    Installed: 10/10/2016<br>Serial Number: N/A    Installed: 10/10/2016 | None                                                                                                                        |
| C-203**<br>C-204**      | Arial Model JGP/1 Electrically-driven Reciprocating Compressor<br>Emissions are fugitive emissions leaks from the rod packing.<br><br>Serial Number: N/A    Installed: 12/16/2023<br>Serial Number: N/A    Installed: 12/16/2023 | None                                                                                                                        |
| C-101<br>C-121**        | Solar C51LL Dry Seal Centrifugal Compressor<br>Emissions are fugitive emissions leaks from the dry seal<br><br>Serial Number: G5110200    Installed: 2/15/2016<br>Serial Number: G5110201    Installed: 3/1/2023                 |                                                                                                                             |
| C-102<br>C-122**        | Solar C336 Dry Seal Centrifugal Compressor<br>Emissions are fugitive emissions leaks from the dry seal<br><br>Serial Number: G2620007    Installed: 2/15/2016<br>Serial Number: G2620008    Installed: 3/1/2023                  | None                                                                                                                        |
| C-201**<br>C-221**      | Solar C61 Dry Seal Centrifugal Compressor<br>Emissions are fugitive emissions leaks from the dry seal<br><br>Serial Number: G6110179    Installed: 8/31/2023<br>Serial Number: G6110184    Installed: 1/5/2024                   | None                                                                                                                        |
| C-202**<br>C-222**      | Solar C51 Dry Seal Centrifugal Compressor<br>Emissions are fugitive emissions leaks from the dry seal                                                                                                                            | None                                                                                                                        |

|                                              |                                                                                                                                                                                                                                                                            |                                                   |
|----------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|
|                                              | Serial Number: G5110323      Installed: 8/31/2023<br>Serial Number: G5110322      Installed: 1/5/2024                                                                                                                                                                      |                                                   |
| TK-101**<br>TK-102**<br>TK-201**<br>TK-202** | 500 bbl. produced water and BTEX liquids atmospheric storage tank.<br><br>Serial Number: N/A      Installed: 10/10/2016<br>Serial Number: N/A      Installed: 10/10/2016<br>Serial Number: N/A      Installed: 12/16/2023<br>Serial Number: N/A      Installed: 12/16/2023 | Cimarron AB100 Enclosed<br>Combustor<br>(ECD-201) |
| EL                                           | Fugitive Equipment Leaks<br><br>Serial Number: N/A      Installed: N/A                                                                                                                                                                                                     | None                                              |

\* MMBtu/h = million British thermal units per hour; MMscfd = million standard cubic feet per day

\*\* New emission units identified during the inspection that were not installed in the initial Title V permit

**Table 3: Requirements for Emission Units**

| Equipment                                                                | Applicable Requirements | Limitations                                                                                                                                                                                    | Monitoring                                          |            |
|--------------------------------------------------------------------------|-------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|------------|
|                                                                          |                         |                                                                                                                                                                                                | Method                                              | Interval   |
| GT-101*<br>Solar Turbine Mars 100<br>GT-121*<br>Solar Turbine Mars 100   | NSPS KKKK               | 25 <sup>a</sup> ppm NO <sub>x</sub> at 15% oxygen (O <sub>2</sub> ) or 54 ng/J of useful output                                                                                                | Performance test                                    | Annual     |
|                                                                          |                         | 110 ng SO <sub>2</sub> /J (0.90 lb SO <sub>2</sub> /MWh) gross output<br>OR<br>Fuel total potential sulfur emissions ≤ 26 ng SO <sub>2</sub> /J (0.060 lb SO <sub>2</sub> /MMBtu) <sup>b</sup> | Performance test                                    | Annual     |
| GT-201*<br>Solar Turbine Titan 130<br>GT-221*<br>Solar Turbine Titan 130 | NSPS KKKK               | 25 <sup>a</sup> ppm NO <sub>x</sub> at 15% oxygen (O <sub>2</sub> ) or 54 ng/J of useful output                                                                                                | Performance test                                    | Annual     |
|                                                                          |                         | 110 ng SO <sub>2</sub> /J (0.90 lb SO <sub>2</sub> /MWh) gross output<br>OR<br>Fuel total potential sulfur emissions ≤ 26 ng SO <sub>2</sub> /J (0.060 lb SO <sub>2</sub> /MMBtu) <sup>b</sup> | Performance test                                    | Annual     |
| SK-101<br>65 MMscfd Dehydration Unit                                     | MACT HH                 | Flare reducing VOC emissions by 95% or more                                                                                                                                                    | Presence of pilot light<br><br>No visible emissions | Continuous |
| SK-121*<br>80 MMscfd Dehydration Unit                                    | MACT HH                 | Flare reducing VOC emissions by 95% or more                                                                                                                                                    | Presence of pilot light<br><br>No visible emissions | Continuous |
| SK-201*<br>200 MMscfd Dehydration Unit                                   | MACT HH                 | Flare reducing VOC emissions by 95% or more                                                                                                                                                    | Presence of pilot light<br><br>No visible emissions | Continuous |

| Equipment                                                                        | Applicable Requirements | Limitations                  | Monitoring                        |                                 |
|----------------------------------------------------------------------------------|-------------------------|------------------------------|-----------------------------------|---------------------------------|
|                                                                                  |                         |                              | Method                            | Interval                        |
| C-103, C-104<br>Arial Model JGP/1 Electrically-driven Reciprocating Compressor   | NSPS OOOOa              | Reduce GHG and VOC emissions | Replace rod packing               | Every 26,000 hours of operation |
| C-203*, C-204*<br>Arial Model JGP/1 Electrically-driven Reciprocating Compressor | NSPS OOOOb              | Reduce GHG and VOC emissions | Volumetric flow rate measurements | Every 8,760 hours of operation  |
| C-102*, C-122*<br>Solar C336 Dry Seal Centrifugal Compressor                     | NSPS OOOOb              | Reduce GHG and VOC emissions | Volumetric flow rate measurements | Every 8,760 hours of operation  |
| C-201*, C-221*<br>Solar C61 Dry Seal Centrifugal Compressor                      | NSPS OOOOb              | Reduce GHG and VOC emissions | Volumetric flow rate measurements | Every 8,760 hours of operation  |
| C-202*, C-222*<br>Solar C51 Dry Seal Centrifugal Compressor                      | NSPS OOOOb              | Reduce GHG and VOC emissions | Volumetric flow rate measurements | Every 8,760 hours of operation  |
| Collection of Fugitive Emissions Components (EL)                                 | NSPS OOOOb              | Reduce GHG and VOC emissions | Monitoring surveys                | Initial and Quarterly           |

<sup>a</sup> Although the Title V permit for Walker Hollow states that the NO<sub>x</sub> limit for GT-101 is 15 ppm at 15% O<sub>2</sub>, it is actually 25 ppm at 15% O<sub>2</sub> per Table 1 to 40 C.F.R. Part 60, Subpart KKKK. (See Section III.C., below, for details.)

<sup>b</sup> Per the information provided by MPLX in its Title V permit application, it is choosing to comply with the MACT KKKK SO<sub>2</sub> requirements using the fuel total sulfur content rather than the SO<sub>2</sub> stack emissions limit.

\* New emission units identified during the inspection that were not installed in the initial Title V permit

## **II. Compliance Schedule for Walker Hollow**

Walker Hollow commenced operations on October 10, 2016. Andeavor promptly ceased compression related activities onsite after initial commencement of operations at the facility due to low natural gas prices. Walker Hollow was operational for less than 14 days and was mothballed at the time of the initial permit issuance. No emission units have operated since November 9, 2016, until March 25, 2022, when operations were resumed.

The Permittee is subject to NSPS KKKK, NSPS OOOOa, NSPS OOOOb, and MACT HH requirements. Further details regarding the compliance schedules can be found below.

**OBSERVATION: According to information submitted by MPLX, “On January 27, 2022, the turbine and other associated equipment were briefly restarted after being shut down since late 2016, and were periodically operated for testing, maintenance, and recommissioning until normal operations resumed on March 25th, 2022. It has been operational since March 25th, 2022”.**

**The facility was operational at the time of the inspection.**

## **III. Standards of Performance for Stationary Gas Turbines - 40 CFR Part 60, Subpart KKKK (NSPS KKKK)**

### **A. Applicability [40 CFR §60.4305]**

40 CFR part 60, subpart KKKK (NSPS KKKK) applies to turbine emissions units GT-101, GT-121, GT-201, and GT-221.

**OBSERVATION: Since turbines GT-101, GT-121, GT-201, and GT-221 have heat inputs at peak loads  $\geq$  10 MMBtu/h and commenced construction, modification, or reconstruction after February 18, 2005, they are subject to NSPS KKKK.**

### **B. General Provisions [40 CFR §§60.1-19]**

1. The General Provisions at 40 CFR part 60, subpart A apply. 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 §60.4:

Director, Air and Toxics Technical Enforcement Program, 8ENF-AT  
Office of Enforcement, Compliance and Environmental Justice  
1595 Wynkoop Street, Denver, Colorado 80202-1129

**OBSERVATION: Dates of the construction notification date, construction commencement dates, start-up notifications, and start-up dates for the turbines can be found in the table below. Pursuant to 40 CFR §60.7(a)(1), the notification for construction has been submitted within the required 30-day timeframe for the start of construction. Pursuant to 40 CFR §60.7(a)(3), a notification of the actual date of initial startup of the turbines was submitted to EPA within the required 15-day from of start-up.**

|                                | GT-101    | GT-121    | GT-201     | GT-221    |
|--------------------------------|-----------|-----------|------------|-----------|
| Construction Notification Date | 4/26/2024 | 3/1/2023  | 9/28/2023  | 1/18/2024 |
| Construction Commencement      | 4/23/2024 | 3/1/2023  | 8/31/2023  | 1/5/2024  |
| Start-up Notification          | 4/26/2024 | 7/5/2023  | 12/28/2023 | 4/17/2024 |
| Start-up Date                  | 4/26/2024 | 6/28/2023 | 12/17/2023 | 4/10/2024 |

**C. NO<sub>x</sub> Requirements** [40 CFR §60.4320 and NSPS KKKK Table 1]

The Permittee shall meet the emission standard of 15 ppm NO<sub>x</sub> at 15% oxygen (O<sub>2</sub>) or 54 nanograms per Joule (ng/J) of useful output.

**OBSERVATION:** Since turbines GT-101, GT-121, GT-201, and GT-221 are new natural gas-fired turbines, with a combustion turbine heat inputs at peak loads of > 50 MMBtu/h and ≤ 850 MMBtu/h, per Table 1 to Subpart KKKK, they must meet a NO<sub>x</sub> emission standard of 25 ppm at 15% O<sub>2</sub> or 54 ng/J of useful output (1.2 lb/MWh). Therefore, the emission limits for the turbines listed in this permit requirement (15 ppm NO<sub>x</sub> at 15% O<sub>2</sub> or 54 ng/J of useful output) are incorrect.

**D. SO<sub>2</sub> Requirements** [40 CFR §60.4330]

The Permittee shall comply with one of the following requirements:

1. The turbine shall not discharge any gases which contain SO<sub>2</sub> in excess of 110 ng/J (0.90 lb/MWh) gross output [40 CFR 60.4330(a)(1)];
2. The turbine shall not burn any fuel which contains total potential sulfur emissions in excess of 26 ng SO<sub>2</sub>/J (0.060 lb SO<sub>2</sub>/MMBtu) heat input. If the turbine simultaneously fires multiple fuels, each fuel shall meet this requirement [40 CFR 60.4330(a)(2)]; or
3. If the turbine burns at least 50 percent biogas on a calendar month basis, as determined based on total heat input, the Permittee shall not cause to be discharged into the atmosphere from the affected source any gases that contain SO<sub>2</sub> in excess of 65 ng SO<sub>2</sub>/J (0.15 lb SO<sub>2</sub>/MMBtu) heat input. [40 CFR 60.4330(a)(3)]

**OBSERVATIONS:** Turbines GT-101, GT-121, GT-201, and GT-221 do not burn biogas, so the requirements at §60.4330(a)(3) do not apply. GT-101, GT-121, GT-201, and GT-221 must comply with the SO<sub>2</sub> emission limits at §§60.4330(a)(1) and (2). Per the information submitted by MPLX in the Title V permit application for Walker Hollow Compressor Station, it is choosing to comply with the MACT KKKK SO<sub>2</sub> requirements using the fuel total sulfur content at §60.4330(a)(2) rather than the SO<sub>2</sub> stack emissions limit at §60.4330(a)(1).

**E. General Compliance Requirements** [40 CFR §60.4333]

The Permittee shall operate and maintain the turbine and air pollution control and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at all times, including during startup, shutdown and malfunction.

## **F. Monitoring and Reporting Requirements**

The Permittee shall comply with the following monitoring, recordkeeping and reporting requirements:

1. Demonstrate continuous compliance for NO<sub>x</sub> as specified in §60.4335 and §60.4355 if using water or steam injection.
2. Demonstrate continuous compliance for NO<sub>x</sub> as specified in §60.4340 and §60.4355 if not using water or steam injection.
3. Demonstrate continuous compliance for NO<sub>x</sub> as specified in §60.4345 and §60.4350 if using continuous emissions monitoring systems (CEMS).

**OBSERVATION:** Since turbines GT-101, GT-121, GT-201, and GT-221 do not use water or steam injection to control NO<sub>x</sub> emissions, pursuant to §60.4340(a), annual performance tests must be conducted to demonstrate continuous compliance with NO<sub>x</sub> emission limits. As an alternative to testing, CEMS may be installed, calibrated, maintained, and operated (see §60.4340(b)). CEMS are not installed at the facility; therefore, annual NO<sub>x</sub> performance testing on turbines GT-101, GT-121, GT-201, and GT-221 is required. Pursuant to §60.4355, during the performance test, acceptable values, and ranges of continuously monitored operating parameters that are indicative of the unit's NO<sub>x</sub> formation characteristics must be established, and a parameter monitoring plan must be developed and kept on-site.

4. Determine the total sulfur content of the turbine's combustion fuel as specified in §60.4360 and §60.4370 unless exempted from monitoring the total sulfur content of the fuel as provided in §60.4365.

**OBSERVATION:** Pursuant to §60.4360, the total sulfur content of fuel being fired into turbines GT-101, GT-121, GT-201, and GT-221 must be determined using the total sulfur methods described in §60.4415. According to §60.4370(c), the monitoring frequency of fuel total sulfur content may be conducted according to custom schedules, which require 30 days of consecutive sampling.

GT-121 was tested over the period of 7/5/2024 to 8/7/2024 using the Gas Processor's Association (GPA) Standard 2377 method. The results of the test were submitted to the EPA on August 28, 2024, and demonstrate compliance with the emission limits for sulfur dioxide as specified in 40 CFR § 60.4330(a)(2).

GT-201 was tested over the period of 1/15/2024 to 2/14/2024 using the Gas Processor's Association (GPA) Standard 2377 method. The results of the test were submitted to the EPA on February 15, 2024, and demonstrate compliance with the emission limits for sulfur dioxide as specified in 40 CFR § 60.4330(a)(2).

GT-101 and GT-221 were tested over the period of 6/12/2024 to 7/11/2024 using the Gas Processor's Association (GPA) Standard 2377 method. The results of the test were submitted to the EPA on July 29, 2024, and demonstrate compliance with the emission limits for sulfur dioxide as specified in 40 CFR § 60.4330(a)(2).

5. Submit reports for excess emissions and monitor downtime for NO<sub>x</sub> and SO<sub>2</sub> as specified in, §60.4375(a), §60.4380, and §60.4385.
6. Submit reports of the results of each performance tests as specified in §60.4375(b).

7. All reports required under §60.7(c) shall be postmarked by the 30<sup>th</sup> day following the end of each 6-month period. (§60.4395)

**OBSERVATION: The table below details the dates of installation for the turbines, the dates of the tests, the dates of the reports, the average NO<sub>x</sub> emissions and the emissions limits for GT-101, GT-121, GT-201, and GT-221. See the submitted performance test results submitted within 30 days of the test taking place. The results show the NO<sub>x</sub> emissions as less than 75% of the emission limit, which allows for testing to take place once every 2 years instead of every 6 months.**

| <b>Turbine</b> | <b>Equipment Installation Date</b> | <b>Date of Test</b> | <b>Date of Test Report</b> | <b>Average NO<sub>x</sub> Emissions</b> | <b>Emission Limit</b> |
|----------------|------------------------------------|---------------------|----------------------------|-----------------------------------------|-----------------------|
| <b>GT-101</b>  | <b>4/26/2024</b>                   | <b>6/3/2024</b>     | <b>7/29/2024</b>           | <b>5.21</b>                             | <b>25</b>             |
| <b>GT-121</b>  | <b>6/28/2023</b>                   | <b>8/30/2023</b>    | <b>10/27/2023</b>          | <b>4.87</b>                             | <b>25</b>             |
| <b>GT-201</b>  | <b>12/17/2023</b>                  | <b>2/21/2024</b>    | <b>3/26/2024</b>           | <b>4.44</b>                             | <b>25</b>             |
| <b>GT-221</b>  | <b>4/10/2024</b>                   | <b>6/4/2024</b>     | <b>7/29/2024</b>           | <b>6.40</b>                             | <b>25</b>             |

**G. Performance Test Requirements [40 CFR §§60.4340(a) and 60.4400]**

1. The Permittee shall conduct an initial performance test for NO<sub>x</sub> emissions, according to §60.8. Subsequent NO<sub>x</sub> performance tests shall be conducted on an annual basis and no more than 14 calendar months following the previous performance test. As specified in §60.4340(a), if the Permittee is not using water or steam injection to control NO<sub>x</sub> emissions, and if the NO<sub>x</sub> emission result from the performance tests is less than or equal to 75 percent of the NO<sub>x</sub> emission limit for the turbine, the Permittee may reduce the frequency of subsequent performance tests to once every 2 years (no more than 26 calendar months following the previous performance test). If the results of any subsequent performance test exceed 75 percent of the NO<sub>x</sub> emission limit for the turbine, the Permittee must resume annual performance tests.
2. The Permittee shall comply with the following requirements for each performance test for NO<sub>x</sub> emissions:
  - (a) Measure NO<sub>x</sub> by using the methodologies in §60.4400(a),
  - (b) The Permittee shall conduct each performance test according to §60.4400(b),
  - (c) If a NO<sub>x</sub>-diluent CEMS is installed, the Permittee shall perform the initial performance test as specified in §60.4405; and
  - (d) If choosing to continuously monitor parameters, the Permittee shall establish a valid parameter range as specified in §60.4410.
3. The Permittee shall conduct an initial performance test for SO<sub>2</sub> emissions, as specified in §60.8 and §60.4415. Subsequent SO<sub>2</sub> performance tests shall be conducted on an annual basis and no more than 14 calendar months following the previous performance test.
4. The Permittee shall conduct each performance test for SO<sub>2</sub> according to §§60.4415(a)(1) - (3).

**OBSERVATION: All the requirements above appear to be met in the submitted performance test results**

and were conducted in the methodologies outlined in EPA 40 CFR 60(A) Methods 1, 3A, 7E and Subpart KKKK. The table below details the dates of installation for the turbines, the dates of the tests, the dates of the reports, the average NOx emissions, and the emissions limits for GT-101, GT-121, GT-201, and GT-221. The results show the NOx emissions as less than 75% of the emission limit, which allows for testing to take place once every 2 years instead of every 6 months.

| Turbine | Equipment Installation Date | Date of Test | Date of Test Report | Average NOx Emissions | Emission Limit |
|---------|-----------------------------|--------------|---------------------|-----------------------|----------------|
| GT-101  | 4/26/2024                   | 6/3/2024     | 7/29/2024           | 5.21                  | 25             |
| GT-121  | 6/28/2023                   | 8/30/2023    | 8/27/2023           | 4.87                  | 25             |
| GT-201  | 12/17/2023                  | 2/21/2024    | 3/26/2024           | 4.44                  | 25             |
| GT-221  | 4/10/2024                   | 6/4/2024     | 7/29/2024           | 6.40                  | 25             |

**IV. Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 - 40 CFR Part 60, Subpart OOOOa (NSPS OOOOa)**

**A. Applicability [40 CFR §§60.5365a(c) and (j)]**

40 CFR part 60, Subpart OOOOa (NSPS OOOOa) applies to the reciprocating compressor on emissions units C-103 and C-104, and the collection of fugitive emissions components, as defined at §60.5430a.

**OBSERVATION: Since the two Arial electrically driven reciprocating compressors (C-103 and C-104) commenced construction, modification, or reconstruction after September 18, 2015, they are considered affected facilities under NSPS OOOOa, pursuant to §60.5365a(c). Since the facility is subject to OOOOb requirements, the collection of fugitive emissions components at the Walker Hollow Compressor Station is considered an affected facility under NSPS OOOOb, pursuant to §60.5365b(i).**

**B. General Compliance Requirements [40 CFR §60.5370a]**

At all times, including during startup, shutdown and malfunction, the Permittee shall maintain and operate the reciprocating compressors and collection of fugitive emission components, air pollution control and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions. Determination of whether acceptable operating 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, opacity observations, review of operating and maintenance procedures, and inspection of the source.

**C. GHG and VOC Emissions Standards for Reciprocating Compressor Affected Facilities [40 CFR §60.5385a]**

The Permittee shall comply with the following standards for each reciprocating compressor affected facility:

1. Replace the reciprocating compressor rod packing according to §60.5385a(a).

**OBSERVATION: Pursuant to §60.5385a(a), the reciprocating compressor rod packing must (1) be replaced on or before the compressor has operated for 26,000 hours; (2) be replaced prior to 36 months from the date of the most recent rod packing replacement or from the date of startup for a new compressor; or (3) collect the methane and VOC emissions from the rod packing and route emissions to a process through a closed vent system that operates under negative pressure. According to the**

information submitted by the source in its Title V permit application for Walker Hollow, it elects to comply with §60.5385a(a)(1) by replacing the rod packing no later than every 26,000 hours of operation.

**OBSERVATION:** As of October 1, 2024, the run time hours of compressor C-103 and C-104 are 1,668 hours and 18,211 hours respectively. There have been no rod packing replacements since they still have some time before reaching 26,000 hours.

2. Demonstrate initial compliance with standards that apply to the reciprocating compressor affected facilities as required by §60.5410a(c).
3. Demonstrate continuous compliance with standards that apply to reciprocating compressor affected facilities as required by §60.5415a(c).

**OBSERVATION:** appears to have continuously monitored the number of hours of operation of C-103 and C-104 and has submitted the initial annual report as required by §60.5410a(c)(1) and (3) and §60.5415a(c)(1) through (3).

4. Perform reporting requirements as specified by §60.5420a(b)(1) and (4) and the recordkeeping as required by §§60.5420a(c)(3), (6) through (9), and (17), as applicable.

**OBSERVATION:** The initial NSPS OOOOa Annual Report for Walker Hollow was submitted by the source on October 27, 2017 (within 90 days of the end of the initial compliance period), as required by §60.5420a(b). The report appeared to contain all of the general information required pursuant to §60.5420a(b)(1) and the information for reciprocating compressor affected facilities at §60.5420a(b)(4).

Pursuant to §60.5420a(c)(3), the source keeps records of the cumulative hours of operation, dates and times of rod packing replacements, and records of deviations on each reciprocating compressor. According to the information provided by the source, no deviations have occurred on C-103 or C-104, and the rod packing on each unit has not been replaced, to date. The recordkeeping requirements at §60.5420a(c)(6), (7), (9), and (17) do not apply because the reciprocating compressors at Walker Hollow have neither a cover nor a closed vent system. The requirement at §60.5420a(c)(8) does not apply because the reciprocating compressors are not subject to the bypass requirements of §60.5416a(a)(4).

**D. GHG and VOC Standards for the Collection of Fugitive Emissions Components [40 CFR §60.5397a]**

The Permittee shall reduce GHG (in the form of a limitation on emissions of methane), and VOC emissions by complying with the requirements in §§60.5397a(a)-(j).

**OBSERVATION:** Per §60.5397a(b)-(d), an emissions monitoring plan is required; a copy of the emissions monitoring plan was provided to EPA upon request and appears to include the required elements. The emissions monitoring plan states that a site map and observation path for each site subject to NSPS OOOOa will be created as required by §60.5397a(d)(1)-(2). §60.5397a(f)(2) requires the initial monitoring survey of the collection of fugitive emissions components at a compressor station to be conducted within 60 days of the startup of production or by June 3, 2017, whichever is later. The initial monitoring survey was conducted on the collection of fugitive emissions components at Walker Hollow Compressor Station on October 4, 2017. According to information provided by the source in its Initial NSPS OOOOa Annual Report, the initial monitoring was conducted after June 3, 2017, due to the judicial stay that was in effect for NSPS OOOOa. Per the annual OOOOa reports component monitoring surveys occurred 2019 through 2023. No fugitive emissions components at the Walker Hollow Compressor Station have been

identified by the source as difficult-to-monitor or unsafe-to-monitor; therefore, the requirements of §60.5397a(g)(3) – (4) do not currently apply.

Per §60.5397a(g)(2), a monitoring survey must be conducted at least quarterly after the initial survey. According to the information provided to EPA by the source, fugitive emissions monitoring surveys were also conducted quarterly from 2019 through 2023. Results of the quarterly monitoring surveys were included in NSPS OOOOa Annual Reports.

**E. Initial Compliance Requirements for Reciprocating Compressor and Fugitive Emission Components Affected Facilities** [40 CFR §§60.5410a(c) and (j)]

1. The Permittee shall achieve initial compliance for each reciprocating compressor affected facility by complying with §§60.5410a(c)(1) - (4).

**OBSERVATION: Pursuant to §§60.5410a(c)(1) - (4), initial compliance for C-103 and C-104 shall be demonstrated by tracking the number of hours of operation, maintaining records, and submitting the Initial NSPS OOOOa Annual Report. See Section IV.C, above, for a discussion of these items.**

2. The Permittee shall achieve initial compliance with the fugitive emission standards for each collection of fugitive emissions components by complying with §§60.5410a(j)(1) - (5).

**OBSERVATION: Pursuant to §§60.5410a(j)(1) - (5), initial compliance for the collection of fugitive emissions components shall be demonstrated by developing a fugitive emission monitoring plan, conducting an initial monitoring survey and making repairs as required by §60.5397a(h), maintaining records, and submitting the Initial NSPS OOOOa Annual Report. See Section IV.D, above, for a discussion of these items.**

**F. Continuous Compliance Requirements for Reciprocating Compressor and Fugitive Emissions Components Affected Facilities** [40 CFR §60.5415a]

1. The Permittee shall demonstrate continuous compliance for the reciprocating compressor according to §60.5415a(c).

**OBSERVATION: As discussed in Section IV.C, above, the source continuously monitors the number of hours of operation for C-103 and C-104. NSPS OOOOa Annual Reports were submitted for 2019 through 2023.**

2. The Permittee shall demonstrate continuous compliance for each collection of fugitive emission components according to §60.5415a(h).

**OBSERVATION: As discussed in Section IV.D, above, the source conducted periodic monitoring surveys each calendar quarter since the initial survey in October 2017. NSPS OOOOa Annual Reports were submitted for 2019-2023, which included results of the initial and quarterly surveys conducted.**

**G. Reporting and Recordkeeping Requirements** [40 CFR §§60.5420a(b) and (c)]

1. The Permittee shall submit annual reports for reciprocating compressors affected facilities containing the information specified in §§60.5420a(b)(1), (4), (7), (9), and (11).
2. The Permittee shall maintain all records identified as specified in §60.7(f) and in §§60.5420a(c)(3), (6-9), and (15).

**OBSERVATION: Based on the information available, the source appears to have submitted annual reports and maintained records as required.**

**V. Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification or Reconstruction Commenced After December 6, 2022 (NSPS OOOOb) Reciprocating Compressors**

**A. Applicability [40 CFR §§60.5365b(c) and (i)]**

40 CFR part 60, Subpart OOOOb (NSPS OOOOb) applies to the reciprocating compressors on emissions units C-203 and C-204, and the collection of fugitive emissions components, as defined at §60.5430b.

**OBSERVATION: Since the two Arial electrically-driven reciprocating compressors (C-203 and C-204) commenced construction, modification, or reconstruction after December 6, 2022, they are considered affected facilities under NSPS OOOOb, pursuant to §60.5365b(c).**

**OBSERVATION: The collection of fugitive emissions components at the Walker Hollow Compressor Station is considered an affected facility under NSPS OOOOb, pursuant to §60.5365b(i).**

**B. General Compliance Requirements [40 CFR §60.5370b]**

At all times, including during startup, shutdown and malfunction, the Permittee shall maintain and operate the reciprocating compressors and collection of fugitive emission components, air pollution control and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions. Determination of whether acceptable operating 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, opacity observations, review of operating and maintenance procedures, and inspection of the source.

**C. GHG and VOC Emissions Standards for Reciprocating Compressor Affected Facilities [40 CFR §60.5385b]**

The Permittee shall comply with the following standards for each reciprocating compressor affected facility:

1. Measure the volumetric flow rate of each cylinder according to §60.5385b(a).

**OBSERVATION: The facility contact states that rod packing vent volumetric flow rates will be measured once every 8,760 hours of operation or 8,760 after hours of operation from May 7, 2024, whichever is later, according to § 60.5385b. As of November 7, 2024 the units have not reached a run time of 8,760 hours yet.**

2. Demonstrate initial compliance with standards that apply to the reciprocating compressor affected facilities as required by §60.5410b(e).
3. Demonstrate continuous compliance with standards that apply to reciprocating compressor affected facilities as required by §60.5415b(g).

**OBSERVATION: The facility contact states that rod packing vent volumetric flow rates will be measured once every 8,760 hours of operation or 8,760 after hours of operation from May 7, 2024, whichever is later, and must have a flow rate of less than 2scfm per cylinder, according to §60.5385b. As of November 7, 2024 the units have not reached a run time of 8,760 hours yet.**

4. Perform reporting requirements as specified by §60.5420b(b)(1), (6), and (11) through (13) as applicable, and the recordkeeping as required by §60.5420b(c)(5) and (8) through (13), as applicable.

**OBSERVATION:** The initial NSPS OOOOb Annual Report for reciprocating compressors C-203 and C-204 at Walker Hollow are required to be submitted within 8,760 hours of operation after May 7, 2024 or on or before 8,760 hours of operation after startup, whichever date is later. At the time of this inspection report compressors C-203 and C-204 have not reached 8,760 hours of operation.

Pursuant to §60.5420b(c)(5), the source keeps records of the cumulative hours of operation since startup or previous volumetric flow rate measurement, the method used and results of volumetric flow rate, records for flow meters, dates and times of rod packing replacements, and records of deviations on each reciprocating compressor. According to the information provided by the source, no deviations have occurred on C-203 or C-204, and the rod packing on each unit has not been replaced, to date.

**D. GHG and VOC Standards for the Collection of Fugitive Emissions Components [40 CFR §60.5397b]**

The Permittee shall reduce GHG (in the form of a limitation on emissions of methane), and VOC emissions by complying with the requirements in §60.5397b.

**OBSERVATION:** Per §60.5397b(b)-(d), an emissions monitoring plan is required; a copy of the emissions monitoring plan for OOOOa, which includes equipment subject to OOOOb, was provided to EPA upon request and appears to include the required elements. The emissions monitoring plan states that a site map and observation path for each site subject to NSPS OOOOa will be created as required by §60.5397b(d)(1)-(2). §60.5397b(f)(2) requires the initial monitoring survey of the collection of fugitive emissions components at a compressor station to be conducted within 90 days of the startup of production or by June 6, 2024, whichever is later. The Facility contact has indicated that “The next OOOOb compliance report will be submitted covering operations during 2024”, as of November 18, 2024 the EPA has not received a report of the initial monitoring survey.

Per §60.5397a(g)(1)(iv), a monitoring survey must be conducted at bimonthly after the initial survey. The Facility contact has indicated that “The next OOOOb compliance report will be submitted covering operations during 2024”, as of November 18, 2024 the EPA has not received a report of continuous monitoring surveys being performed

**E. Initial Compliance Requirements for Reciprocating Compressor and Fugitive Emission Components Affected Facilities [40 CFR §§60.5410b(e) and (k)]**

1. The Permittee shall achieve initial compliance for each reciprocating compressor affected facility by complying with §§60.5410b(e)(1) - (7).

**OBSERVATION:** Pursuant to §§60.5410a(c)(1) - (4), initial compliance for C-203 and C-204 shall be demonstrated by tracking the number of hours of operation, volumetric flow rates, maintaining records, and submitting the Initial NSPS OOOOb Annual Report. See Section IV.C, above, for a discussion of these items.

2. The Permittee shall achieve initial compliance with the fugitive emission standards for each collection of fugitive emissions components by complying with §§60.5410b(k)(1) - (5).

**OBSERVATION:** Pursuant to §§60.5410b(k)(1) - (5), initial compliance for the collection of fugitive

emissions components shall be demonstrated by developing a fugitive emissions monitoring plan, conducting an initial monitoring survey, and making repairs as required by §60.5397b(h), maintaining records, and submitting the Initial NSPS OOOOb Annual Report. See Section IV.D, above, for a discussion of these items.

**F. Continuous Compliance Requirements for Reciprocating Compressor and Fugitive Emissions Components Affected Facilities [40 CFR §60.5415b]**

1. The Permittee shall demonstrate continuous compliance for the reciprocating compressor according to §60.5415b(g).

**OBSERVATION: As discussed in Section IV.C, above, the source continuously monitors the number of hours of operation for C-203 and C-204.**

2. The Permittee shall demonstrate continuous compliance for each collection of fugitive emission components according to §60.5415b(l).

**OBSERVATION: As discussed in Section IV.D, above, the source has not yet submitted the biweekly monitoring surveys and has indicated that they would be included in the 2024 annual report.**

**G. Reporting and Recordkeeping Requirements [40 CFR §§60.5420b(b) and (c)]**

1. The Permittee shall submit annual reports for reciprocating compressors affected facilities containing the information specified in §60.5420b(b)(6).
2. The Permittee shall maintain all records identified as specified in §60.7(f) and in §60.5420b(c)(5).

**OBSERVATION: Subpart OOOOb went into effect in 2024 thus no annual reports have yet been submitted.**

**VI. Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification or Reconstruction Commenced After December 6, 2022 (NSPS OOOOb) Centrifugal Compressors**

**B. Applicability [40 CFR §§60.5365b(c) and (i)]**

40 CFR part 60, Subpart OOOOb (NSPS OOOOb) applies to the dry seal centrifugal compressors on emissions units C-121, C-122, C-201, C-202, C-221, and C-222, and the collection of fugitive emissions components, as defined at §60.5430b.

**OBSERVATION: Since the six dry seal centrifugal compressors (C-121, C-122, C-201, C-202, C-221, and C-222) commenced construction, modification, or reconstruction after December 6, 2022, they are considered affected facilities under NSPS OOOOb, pursuant to §60.5365b(b).**

**OBSERVATION: The collection of fugitive emissions components at the Walker Hollow Compressor Station is considered an affected facility under NSPS OOOOb, pursuant to §60.5365b(i).**

**B. General Compliance Requirements [40 CFR §60.5370b]**

At all times, including during startup, shutdown and malfunction, the Permittee shall maintain and operate the reciprocating compressors and collection of fugitive emission components, air pollution control and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions. Determination of whether acceptable operating 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, opacity observations, review of operating and maintenance procedures, and inspection of the source.

**C. GHG and VOC Emissions Standards for Centrifugal Compressor Affected Facilities [40 CFR §60.5380b]**

The Permittee shall comply with the following standards for each reciprocating compressor affected facility:

1. Measure the volumetric flow rate of each cylinder according to §60.5380b(a).

**OBSERVATION: The facility contact states volumetric flow rates will be measured once every 8,760 hours of operation, or after 8,760 hours of operation from May 7, 2024, whichever is later according to §60.5380b. As of November 7, 2024, the units have not reached a run time of 8,760 hours yet.**

2. Demonstrate initial compliance with standards that apply to the reciprocating compressor affected facilities as required by §60.5410b(d).
3. Demonstrate continuous compliance with standards that apply to reciprocating compressor affected facilities as required by §60.5415b(d).

**OBSERVATION: The facility contact states volumetric flow rates will be measured once every 8,760 hours of operation or after 8,760 hours of operation from May 7, 2024, and must have a flow rate of less than 10scfm per seal according to §60.5385b. As of November 7, 2024, the units have not reached a run time of 8,760 hours yet.**

4. Perform reporting requirements as specified by §60.5420b(b)(1), (6), and (11) through (13) as applicable, and the recordkeeping as required by §60.5420b(c)(5) and (8) through (13), as applicable.

**OBSERVATION: The initial NSPS OOOOb Annual Report for dry seal centrifugal compressors C-203 and C-204 at Walker Hollow are required to be submitted within 8,760 hours of operation after May 7, 2024, or on or before 8,760 hours of operation after startup, whichever date is later. At the time of this inspection report compressors the centrifugal compressors have not reached 8,760 hours of operation.**

**Pursuant to §60.5420b(c)(4), the source keeps records of the cumulative hours of operation since startup or previous volumetric flow rate measurement, the method used and results of volumetric flow rate, records for flow meters, and records of deviations on each centrifugal compressor. According to the information provided by the source, no deviations have occurred on centrifugal compressors, to date.**

**D. GHG and VOC Standards for the Collection of Fugitive Emissions Components [40 CFR §60.5397b]**

The Permittee shall reduce GHG (in the form of a limitation on emissions of methane), and VOC emissions by complying with the requirements in §60.5397b.

**OBSERVATION: Per §60.5397b(b)-(d), an emissions monitoring plan is required; a copy of the emissions monitoring plan for OOOOa, which includes equipment subject to OOOOb, was provided to**

EPA upon request and appears to include the required elements. The emissions monitoring plan states that a site map and observation path for each site subject to NSPS OOOOa will be created as required by §60.5397b(d)(1)-(2). §60.5397b(f)(2) requires the initial monitoring survey of the collection of fugitive emissions components at a compressor station to be conducted within 90 days of the startup of production or by June 6, 2024, whichever is later. The Facility contact has indicated that “The next OOOOb compliance report will be submitted covering operations during 2024”, as of November 18, 2024, the EPA has not received a report of the initial monitoring survey.

Per §60.5397a(g)(1)(iv), a monitoring survey must be conducted at bimonthly after the initial survey. The Facility contact has indicated that “The next OOOOb compliance report will be submitted covering operations during 2024”, as of November 18, 2024, the EPA has not received a report of continuous monitoring surveys being performed.

**E. Initial Compliance Requirements for Centrifugal Compressor and Fugitive Emission Components Affected Facilities [40 CFR §§60.5410b(d) and (k)]**

1. The Permittee shall achieve initial compliance for each reciprocating compressor affected facility by complying with §§60.5410b(d)(6) - (8).

**OBSERVATION: Pursuant to §§60.5410b(d)(6) - (8), initial compliance for the centrifugal compressors shall be demonstrated by tracking the number of hours of operation, volumetric flow rates, maintaining records, and submitting the Initial NSPS OOOOb Annual Report. See Section IV.C, above, for a discussion of these items.**

2. The Permittee shall achieve initial compliance with the fugitive emission standards for each collection of fugitive emissions components by complying with §§60.5410b(k)(1) - (5).

**OBSERVATION: Pursuant to §§60.5410b(k)(1) - (5), initial compliance for the collection of fugitive emissions components shall be demonstrated by developing a fugitive emissions monitoring plan, conducting an initial monitoring survey and making repairs as required by §60.5397b(h), maintaining records, and submitting the Initial NSPS OOOOb Annual Report. See Section IV.D, above, for a discussion of these items.**

**F. Continuous Compliance Requirements for Reciprocating Compressor and Fugitive Emissions Components Affected Facilities [40 CFR §60.5415b]**

1. The Permittee shall demonstrate continuous compliance for the reciprocating compressor according to §60.5415a(g).

**OBSERVATION: As discussed in Section IV.C, above, the source continuously monitors the number of hours of operation for the centrifugal compressors.**

2. The Permittee shall demonstrate continuous compliance for each collection of fugitive emission components according to §60.5415b(l).

**OBSERVATION: As discussed in Section IV.D, above, the source has not yet submitted the biweekly monitoring surveys and has indicated that they would be included in the 2024 annual report.**

**G. Reporting and Recordkeeping Requirements [40 CFR §§60.5420b(b) and (c)]**

1. The Permittee shall submit annual reports for centrifugal compressors affected facilities containing the information specified in §§60.5420b(b)(5)(vi).
2. The Permittee shall maintain all records identified as specified in §60.7(f) and in §§60.5420b(c)(4) and (9).

**OBSERVATION: Subpart OOOOb went into effect in 2024 thus no annual reports have yet been submitted.**

**VII. National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities - 40 CFR Part 63, Subpart HH (MACT HH)**

**A. Applicability [40 CFR §§63.760(a)-(d)]**

40 CFR part 63, subpart HH (MACT HH) applies to emissions units SK-101, SK-121, and SK-201. 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 HAP.

**OBSERVATION: The glycol dehydrators (SK-101, SK-121, and SK-201) meets the definition of large glycol dehydration units at 40 C.F.R. §63.761. Not considering controls, Walker Hollow is a major source of HAP under MACT HH; therefore, the major source requirements apply.**

**B. General Standards [40 CFR part 63, subpart A and §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. Except as specified in §63.764(e), the Permittee shall comply with the following requirements for the glycol dehydration unit:
  - (a) The control requirements for glycol dehydration unit 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.
3. 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: A John Zink low-pressure flare (FL-101) is used as the control device for the glycol dehydrators (SK-101 and SK-121). A Zeeco Air-Assisted Flare (FL-201) is used as backup to the VRU. The pilot light in the flare is monitored by a thermocouple and the data is recorded by a SCADA system.**

**C. Glycol Dehydration Unit Process Vent Standards [40 CFR §§63.765 and 63.771]**

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 controlling air emissions specified in §63.765(b);
2. For each closed-vent system, the Permittee shall comply with the closed-vent system requirements specified in §63.771(c);
3. For each control device, the Permittee shall comply with the applicable control device requirements specified in §63.771(d) or §63.771(f); and
4. For each process modification made to comply with the glycol dehydration unit process vent standards at §63.765(c)(2), the Permittee shall comply with the process modification standards specified in §63.771(e).

**OBSERVATION:** The dehydration units at Walker Hollow Compressor Station are considered large dehydration units, so the requirements in 40 CFR §63.771(d) apply. Dehydration units SK-101 and SK-121 use control devices rather than process modifications to comply with the MACT HH glycol dehydration units process vent standards, so they comply with the standards at 40 CFR §63.765(b) rather than §63.765(c)(2). Dehydration unit SK-201 uses a vapor recovery unit and thus complies with §63.765(c)(1).

As specified at §63.771(c), emissions from the dehydration units SK-101 and SK-121 are routed via a closed vent system (CVS) to flare FL-101. Dehydration unit SK-201 is controlled by a VRU and backup flare FL-201. According to information provided by the source during the inspection, the CVS contains a bypass device. Pursuant to §63.771(c)(3)(i), the source must either (A) install, calibrate, maintain, and operate a flow indicator at the inlet to the bypass device that is capable of taking periodic readings and sounding an alarm when the bypass device is open or (B) secure the bypass device valve in the non-diverting position using a car-seal or a lock-and-key type configuration. According to the information provided by the source, the facility complies with the requirements at §63.771(c)(3)(i)(A). The SCADA system continuously tracks the time during which the flare pilot is out and automatically shuts down production in the event the flare turning off.

Per 40 CFR §63.771(d)(1)(iii), the flares 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. No visible emissions from the flare were observed during the inspection. Per 40 CFR §§63.771(e)(1)(i) and (e)(2), no performance test on the flare is required.

**D. Test Methods, Compliance Procedures and Compliance Determination Requirements**  
[40 CFR §63.772]

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

**OBSERVATION:** Per §63.772(e)(1)(i), a flare does not require performance testing if it is designed and operated in accordance with §63.11(b). Pursuant to §63.772(e)(2), a compliance determination shall be conducted using Method 22 of 40 C.F.R. Part 60, Appendix A, for visible emissions. Method 22 readings were included in the Notification of Compliance Status Report as required by §63.772(e)(2).

**E. Inspection and Monitoring Requirements** [40 CFR §63.773]

1. For each closed-vent system or cover required for 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).

**OBSERVATION: The inspection and monitoring requirements specified in 40 CFR §63.773(c) require an initial inspection according to the procedures of Method 21, 40 C.F.R. Part 60, Appendix A to demonstrate that the closed-vent system operates with no detectable emissions. According to information provided by the source, the CVS at Walker Hollow is considered permanently or semi-permanently sealed; therefore, the CVS inspection and monitoring requirements at §63.773(c)(2)(i) apply. Pursuant to §63.773(c)(2)(i)(A), an initial Method 21 inspection is required; the initial inspection was conducted on November 8, 2016, and results were included in the Notification of Compliance Status Report, as required by §63.772(c)(2)(i)(A). Annual visual inspections for defects on the closed-vent system are also required pursuant to §63.773(c)(2)(i)(B). According to the information provided by the source, annual visual inspections have been conducted at Walker Hollow since the dehydration unit restarted operation in 2022. No cover is installed to comply with §63.764; therefore, the inspections required by §63.773(c)(2)(iii) do not apply.**

2. For each control device required for 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(b) or §63.773(d).

**OBSERVATION: The control device at the Walker Hollow Compressor Station that is used to comply with 40 CFR Part 63, Subpart HH was not tested under 40 CFR §63.772(h); therefore, the inspection and monitoring requirements at 40 CFR §63.773(b) do not apply. Per the requirements of 40 CFR §63.773(d), the continuous ignition of the pilot light in the flare is continuously monitored via thermocouple.**

**SK-201 uses a vapor recovery unit and complies with the requirements outlined in § 63.771(d).**

**F. 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), (d), (e), (g) and (h).
3. Except as specified in §§63.774(c), 63.774(d) and 63.774(f), 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. For glycol dehydration units operating at the source that meet the exemption criteria in §63.764(e)(1)(i) or §63.764(e)(1)(ii), the Permittee shall maintain records as specified in §63.774(d).
6. The Permittee shall keep records of the requirements of §63.774(e) when using a flare to comply with §63.771(d).
7. 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.

8. The Permittee shall keep records of the requirements of §63.774(h) when using a control device whose model is tested under §63.772(h) to comply with §§63.771(d), (e)(3)(ii) and (f)(1).
9. The Permittee shall keep records, pursuant to §63.774(i), of the date the semi-annual maintenance inspection required under §63.773(b) is performed when using a control device whose model was tested under §63.772(h).

**OBSERVATION: The facility logs and maintains records through a SCADA system, and records are stored at a central location.**

**G. 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.
2. 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 Notification of Compliance Status Report was submitted on March 29, 2017, which is within 180 days of the compliance date, as required by §63.775(d). The report appeared to include all required information.**

**Per §63.775(e)(1), the first semi-annual periodic report shall be submitted no later than 240 days after the date the Notification of Compliance Status Report is due and shall cover the 6-month period beginning on the date the Notification of Compliance Status is due. The source has submitted a semiannual MACT HH reports for the Walker Hollow Compressor Station since it began operating 2022. Flare information required pursuant to §63.775(e)(2)(x) appears to have been submitted. A certification of truth, accuracy, and completeness was submitted in the reports as required by §63.775(e)(2)(xiv).**

**During non-operation (i.e. prior to 2022) of the Walker Hollow Compressor Station, the EPA has agreed to accept a copy of the Annual Title V Form FEE in lieu of the semi-annual periodic MACT reports<sup>1</sup>; therefore, no additional MACT HH semi-annual reports have been received for the Walker Hollow Compressor Station since the initial report.**

**VIII. 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.

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<sup>1</sup> This was approved in an email from Alexis North/EPA to Thomas Gibbons/Andeavor on June 6, 2018.

**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 shall cover the period from the effective date of this permit through December 31, 2018. Thereafter, the report shall be submitted semi-annually, by April 1<sup>st</sup> and October 1<sup>st</sup> of each year. The report due on April 1<sup>st</sup> shall cover the 6-month period ending on the last day of December before the report is due. The report due on October 1<sup>st</sup> 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.

**OBSERVATION: The semi-annual (SIXMON) reports for the Walker Hollow Compressor Station were submitted for each reporting period from 2019 through 2024.**

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 two (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](mailto: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.

**OBSERVATION: No deviations were reported in the Title V Annual Compliance Certification (TVACC) or SIXMON Reports received between 2019 and 2024.**

**IX. 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 1<sup>st</sup>. The fee shall cover the previous calendar year.

**OBSERVATION: The source submitted the required FEE Calculation Worksheets to EPA for years it was operating including the 2022 through 2024 reporting years.**

**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 1<sup>st</sup>.

**OBSERVATION: Annual emissions reports for the Walker Hollow Compressor Station were submitted for the 2019 through 2023 reporting years.**

**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 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 April 1<sup>st</sup>, and shall cover the same 12-month period as the two consecutive semi-annual monitoring reports.

**OBSERVATION: The source submitted all Title V Annual Compliance Certification (TVACC) for the Walker Hollow Compressor Station for 2019 through 2023 reporting periods.**

**O. Off Permit Changes [40 CFR §§71.6(a)(12) and 71.6(a)(3)(ii)]**

The Permittee is allowed to make certain changes without a permit revision, provided that the following requirements are met, and that all records required by this section are kept for a period of 5 years.

**OBSERVATION: Per the source, no off-permit changes have been conducted at the Walker Hollow Compressor Station.**



## APPENDIX A: Site Overview



Figure 1: Walker Hollow Compressor Station Aerial View

Appendix B  
Photo and Video Log

| File Name | Location | Description                                           |
|-----------|----------|-------------------------------------------------------|
| Mov_3576  | SK-101   | Emissions from the manway at the bottom of the tower. |