

Operated by MPLX¹ – Red Wash 24B Gas Plant
Full Compliance Evaluation (FCE)
On-Site Inspection

Inspection Date: March 23, 2023

Inspection Report Date: April 25, 2023

EPA Representatives: Colin LeCortz, Environmental Scientist, US EPA Region 8
Michael Stovern, Environmental Scientist, US EPA Region 8
Christine Tokarz, FIFRA Inspector, US EPA Region 8

Tribal Representatives: Mike Natchees
Monaco Weidner
Alverna Nelson
Mariko Blackbird

Company Representatives: Joshua Hirschi
Megan Horrocks
Mike Trogstad

Inspection Report Prepared By: Colin LeCortz, Environmental Scientist, US EPA Region 8

Inspection Report Reviewed By: Scott Patefield, Manager, Enforcement and Compliance Assurance
Division, Air and Toxics Enforcement Branch

Last Inspection: July 13, 2016

Operating Status: Shut-in/ Not actively operating

Applicable Requirements: Title V
40 CFR Part 60, Subpart JJJJ: Standards of Performance for New
Stationary Spark Ignition Internal Combustions Engines (NSPS
JJJJ)
40 CFR Part 60, Subpart OOOOa: Standards of Performance for
Crude Oil and Natural Gas Facilities for Which Construction,
Reconstruction or Modification Commenced After September 18,
2015 (NSPS OOOOa)
40 CFR Part 63, Subpart ZZZZ: National Emissions Standards for
Hazardous Air Pollutants for Stationary Reciprocating Internal
Combustion Engines (MACT ZZZZ)
40 CFR Part 68, Chemical Accident Prevention

SCOTT PATEFIELD  Digitally signed by SCOTT
PATEFIELD
Date: 2023.04.27 07:29:18 -0600

Permit Number: V-UO-000001-2008.00
Replaces Permit No.: V-OU-0001-00.00

Issue Date: April 13, 2020
Effective Date: May 13, 2020
Expiration Date: May 13, 2025

¹ Red Wash 24B Gas Plant is owned by Andeavor Field Services, LLC and operated by MPLX according to information in permit V-UO-000001-2008.00.

Facility Information and Emission Unit Identification

Parent Company Name: MPLX
Mailing Address: 1515 Arapahoe Street, Tower 1, Suite 1600, Denver, Colorado 80202
Facility Contact: Joshua Hirschi, Environmental Engineer
(435) 781-7489
Facility Operator & Name: MPLX – Red Wash 24B Gas Plant (Red Wash)
Facility Location: Latitude 40.197, Longitude -109.281
County, State: Uintah, Utah
Reservation: Uintah and Ouray Indian Reservation
Tribe: Ute Indian Tribe
Responsible Official: James O. Wakeley, Operations Senior Director
SIC Code: 1311 – Crude Petroleum and Natural Gas
AFS ID: 49-047-00021
Other CAA Permits: There are no other CAA permits for this facility.

Enforcement History

None in the past five years.

Inspection Findings/Areas of Concern

No concerns were identified through the inspection and records review of the facility.

Compliance Assistance

No compliance assistance was provided as a result of this full compliance evaluation. However, a copy of this report, which highlights EPA's areas of concern, will be provided to MPLX upon finalization.

Description of Operations²

Red Wash consists of two process trains whose equipment is alike and operates similarly. The inlet stream containing wet gas and liquids is routed through a slug catcher, where liquids initially drop out and are then routed to a condensate separator where water, condensate and vapor are separated. Produced water is then directed to a slop tank, condensate is pumped off location to storage at another facility, and vapor (overhead gas) flows into the overhead compressor (Emissions Unit C-5100 in Table 2 below).

There are two refrigerant compressors (Emissions Units C301 and C302 in Table 2 below), one for each of the trains. C301 is driven by an electric motor and C302 is driven by a natural gas engine to help chill the inlet gas stream. The chilled stream containing the natural gas liquids (NGLs) and rich glycol then passes through a three-phase cold separator where the gas collected from the top is routed offsite via sales pipeline. The NGLs are then transferred to the NGL stabilizer where lighter hydrocarbon components are removed. The residual NGLs are then transferred to one of the two 30,000-gallon pressurized storage tanks (Emissions Units T-1 and T-2 in Table 2 below) and finally leave the facility by liquids pipeline. The gas containing hydrocarbon components removed from the stabilizer are pressurized by the stabilizer overhead compressor, Emissions Unit C-5100, which is common to both trains and either routed to the gas sales pipeline or recirculated back into the process trains.

² The description of operations provided here is a modified excerpt from the process description provided by MPLX in its Title V permit V-UO-000001-2008.00.

Rich ethylene glycol (EG), containing water and entrained hydrocarbons, is transferred from the cold separator to a flash tank. The lighter hydrocarbon components vaporize and are routed to a flare. The rich EG is routed to an EG reboiler (Emissions Unit H-2400 in Table 2 below) where the waste vapor containing mostly water is driven off and vented to the flare. Regenerated EG is recirculated to the beginning of the process to be injected into the inlet gas stream or to be used as a heat medium for the NGL stabilizers.

A condensate storage tank (Emissions Unit TK-5620 in Table 2 below) on location also receives various additional liquids from throughout the facility, e.g., inlet filters, scrubber dumps and flare knock out drums.

General Inspection Observations and Commentary

On March 23, 2023 at 11:14 AM, EPA representatives Colin LeCortz, Michael Stovern and Christine Tokarz and Ute Tribe Air Program representatives Mike Natchees, Monaco Weidner, Alverna Nelson, Mariko Blackbird met with MPLX representatives Megan Horrocks, Mike Trogstad, and Joshua Hirshi at the Red Wash 24B Gas Plant (Red Wash) facility operated by MPLX. A brief opening meeting to discuss the operations at Red Wash was completed and MPLX was aware that EPA inspectors would be using forward looking infrared (FLIR) camera, but that the camera operator would remain at a safe distance from all potential sources of ignition at the site; therefore, no hot work permit was required. During a safety meeting, EPA representatives informed the inspectors that the facility would not be fully accessible due to Koda Middlefork Energy replacing an underground 18 inch natural gas pipeline that went underneath Red Wash (See photo DC_3188.jpg).

MPLX representatives informed the EPA inspectors that the facility inlet was blind flanged (See photo DC_3187.jpg). Email correspondence with Joshua Hirschi confirmed the removal of the inlet slug catcher and flanging occurred on March 1, 2022. Prior to the inlet being blind flanged, the facility did not operate since the previous inspection and was shut-in since March 22, 2017. The instrument air to provide power to the pneumatics was also removed from Red Wash. MPLX representatives discussed that the SCADA system might also be removed and transferred to another MPLX facility. The facility was purged with 50 psi of residue gas according to information provided during the onsite inspection.

EPA inspectors verified the serial numbers on electric compressor C301 and compressor C302 to match the Title V permit. EPA inspectors confirmed that none were operating. Engine C-5100 overhead compressor could not be accessed due to the Koda Middlefork Energy replacing their underground natural gas pipeline. No equipment was operating or capable of operating because the equipment would need to use an inlet gas stream for onsite power. It was verified that the facility is fully disconnected from any process streams or power sources that EPA inspectors could readily access during the onsite inspection. Red Wash has a maximum capacity of approximately 13.5 MMscf/d for the entire facility throughput, when operating.

EPA and Ute Tribe representative met with MPLX representatives for a brief closing conference. A confidential business information (CBI) warning was presented to MPLX representatives, and no CBI was initially claimed. During the on-site conference, Mr. LeCortz discussed requests that will be sent via email regarding facility shut-in and type of operating procedures that will take place when the facility begins operating again in the future. EPA inspectors departed the facility at 11:59 AM. An email to request relevant compliance-related information and records was sent to Joshua Hirschi on March 23, 2023. Mr. Hirschi provided the requested information to EPA via email on April 21, 2023.

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. Independently enforceable applicable requirements are considered enforceable to the extent that the source is in compliance with the standard. In addition, beneficial reductions in non-targeted pollutants resulting from compliance with an independently enforceable applicable requirement may be counted towards PTE provided the emission reduction of the non-targeted pollutant is enforceable as a practical matter and compliance is being met. See the 1995 guidance memo signed by John Seitz, Director of the Office of Air Quality Planning and Standards titled, “Options for Limiting Potential to Emit of a Stationary Source under section 112 and Title V of the CAA.”

MPLX reported the controlled emissions unit-specific PTE in their Part 71 permit application. The PTE in Table 1 are based on the applicable legally and practically enforceable requirements outlined in the draft permit.

Table 1: Potential to Emit in Tons Per Year (tpy)
MPLX Red Wash 24B Gas Plant

Table 1 – Potential-to-Emit With Legally and Practicably Enforceable Controls

Emissions Unit Id.*	NO_x (tons/yr)	CO (tons/yr)	VOC (tons/yr)	SO₂ (tons/yr)	PM (tons/yr)	CO₂e(tons/yr)	HAPs (tons/yr)
C302	154.78	107.16	3.57	0.03	0.44	5380.55	1.13
C-5100	8.03	16.07	5.62	0.02	0.63	3782.28	0.78
H-2400	-	-	10.16	-	-	1793.3	2.52
EG	1.50	1.26	0.08	0.01	0.11	876.50	0.03
TK-5600	-	-	2.71	-	-	2.43	0.02
TK-5620	-	-	2.27	-	-	7.46	0.09
FL-920	0.35	0.30	0.02	0	0.03	462.30	0.01
FL-5710	0.02	0.02	0	0	0	24.5	0
FL-5800	0.18	0.06	0	0	0.01	401.9	0
VE	-	-	1.08	-	-	78.49	0.02
LO	-	-	0.14	-	-	-	0
EL	-	-	6.94	-	-	218.21	0.04
TOTAL	164.86	124.87	32.59	0.06	1.22	13,027.92	4.64

*NO_x = nitrogen oxide; VOC = volatile organic compound; SO₂ = sulfur dioxide; PM = particulate matter; CO = carbon monoxide; CO₂e = carbon dioxide equivalent; HAP = hazardous air pollutant.

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

Table 2 - Emission Units and Emission Generator Activities

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		(IEU)
EL	Equipment Leaks (fugitives)	None

MMBtu/hr = million British thermal units per hour; hp = horsepower; MMscfd = million standard cubic feet per day; bbl = barrel; gal = gallon; 4SRB = 4 Stroke Rich-Burn; IEU = insignificant emission unit; NGL = natural gas liquid; AFRC = air to fuel ratio controller; NSCR = non-selective catalytic reduction; EG = ethylene glycol; RICE = reciprocating internal combustion engine.

Table 3: Requirements for Emission Units

Equipment	Applicable Requirements	Limitations	Monitoring	
			Method	Interval
C301	NA	NA	NA	NA
C302	MACT ZZZZ	Operating and maintenance	Change oil and filter. Inspect: spark plugs, hoses and belts; replace as necessary.	2,160 hours of operation.
C-5100	NSPS JJJJ NSPS OOOOa	NO _x = 1.0 g/hp-hr CO = 2.0 g/hp-hr VOC = 0.7 g/hp-hr Rod Packing Requirements	Performance test Rod packing would occur according to NSPS OOOOa 60.5385a(a)(1): Every 26,000 hours	8,760 hrs of op or 3 yrs, whichever is first. Continuous compliance with rod packing requirements.
H-2400 EG	NSPS OOOOa/NSPS VVa	Control device reducing VOC emissions by 95% or more and compliance with 60.18	Method 21 (LDAR) and Method 22 (opacity)	Method 21: Annually Method 22: At all times. Smokeless flare operation. Closed vent systems: Annual AVO
TK-5600	NA	NA	NA	NA
TK-5620	NA	NA	NA	NA
VE LO EL	NSPS OOOOa/NSPS VVa	LDAR	Method 21	Valves: Monthly ^a Pumps: Monthly Pressure Relief Device: Quarterly Closed vent systems: Annual AVO.
FL-920	NSPS OOOOa/ NSPS VVa	Control device reducing VOC emissions by 95% or more and compliance with 60.18	60.18	Upon Startup

^a Monthly LDAR on valves for which a leak is not detected for 2 successive months may be monitored the first month of every quarter, beginning with the next quarter, until a leak is detected.

OBSERVATION: Mr. LeCortz confirmed the engine emission units for matching make, model, and serial number information, where possible, from the nameplates matched the information listed in the permit.

I. Standards of Performance for Stationary Spark Ignition (SI) Internal Combustion Engines (ICE) - 40 CFR Part 60, Subpart JJJJ

A. Applicability [40 CFR 60.4230(a)(4)(i)]

1. 40 CFR part 60, subpart JJJJ (Subpart JJJJ) applies to the following engine:
 - (a) Waukesha F3524GSI overhead compressor engine identified as Emissions Unit C-5100 in Table 2 of this permit.
2. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of Subpart JJJJ.

OBSERVATION: Engine C-5100 is a spark ignition (SI), internal combustion engines (ICE) constructed after July 1, 2007, and is therefore, subject to NSPS JJJJ per §60.4230(a)(4)(i).

B. General Provisions [40 CFR 60.4246 and Table 3]

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

Branch Chief, Air Enforcement and Toxics 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 or via email to:
R8AirReportEnforcement@epa.gov.

C. Emission Standards [40 CFR 60.4233(e), 60.4234, and Table 1]

1. The Permittee shall comply with the emissions standards for non-emergency, SI ICE greater than 500 hp, for Emissions Unit C-5100, as specified in §60.4233(e).
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: Engine C-5100 has not operated since it was installed at the facility (outside of firing the unit to test the configuration). Upon initial startup the engine must comply with the emissions limits found in NSPS JJJJ Table 1 for engines manufactured after July 1, 2010 with greater than 500 hp. Emission limits are also listed in Table 3 above.

D. Compliance Requirements [60.4243(b) and 60.4244, as applicable]

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 manufactures 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 record 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 subsequent performance testing every 8,760 hours or 3 years, whichever comes first, thereafter to demonstrate compliance.

OBSERVATION: No initial or subsequent performance tests have occurred for C-5100 because the engine has not operated since initial installation at the facility. The engine ran for 5 days after it was configured at the facility.

Pursuant to §60.4243(b)(2)(ii), MPLX is required to keep a maintenance plan and records of conducted maintenance on C-5100, and to operate the engines in a manner consistent with good air pollution control practices. In an email provided by MPLX on April 21, 2023, MPLX indicated that maintenance will be scheduled to be conducted at regularly scheduled intervals of 720 hours and 2,000 hours for specific services, when operating. An initial performance test must be conducted on the engine, with subsequent testing every

8,760 hours or three years, whichever comes first, when the facility starts up.

E. Testing Requirements [40 CFR 60.4244 and 60.4245(d)]

For each performance test required, the Permittee shall comply with the procedures as specified in §60.4244(a)-(f) and submit performance test results according to §60.4245(d).

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.

No initial or subsequent performance tests have occurred for C-5100 because the engine has not operated since initial installation at the facility. The engine ran for 5 days after it was configured at the facility. 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.

F. Notifications, Reports and Records for Owners and Operators [40 CFR 60.4245]

The Permittee shall comply with all of the applicable notification, reporting and recordkeeping requirements for non-emergency SI ICE greater than 500 hp, as specified in §60.4245.

OBSERVATION: MPLX has notified EPA that the engine has not operated because the entire facility has been mothballed since 2016. MPLX submits semiannual and annual reports that have documented that the facility has not operated, as shown in Table 4 below. These reports satisfy the reporting requirements of NSPS JJJJ.

III. 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

A. Applicability [40 CFR 60.5365a(c) and (f)]

1. 40 CFR part 60, subpart OOOOa (Subpart OOOOa) applies to the following:
 - (a) Waukesha F3524GSI engine identified as Emissions Unit C-5100 in Table 2 of this permit.
 - (b) The group of all equipment, except compressors, within the process unit of Red Wash.
2. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of Subpart OOOOa for the affected facilities.

[Explanatory Note: Many of the requirements of Subpart OOOOa, Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants, refer to the

requirements of 40 CFR part 60, subpart VVa, Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006 from §60.480a-489a. Terms used throughout this section have the meaning given to them in Subpart OOOOa, Subpart A, Subpart VVa, and the CAA.]

OBSERVATION: The reciprocating compressor associated with C-5100 began operations on 8/26/2016. Therefore, it is an affected facility according to §60.5365a(c).

According to information provided by MPLX, Red Wash 24B voluntarily incorporated the entire process unit as an Onshore Natural Gas Processing Plant subject to the requirements of NSPS OOOOa based on the 8/26/2016 applicability date of the startup of the reciprocating compressor associated with C-5100.

Additionally, MPLX provided information on April 21, 2023 regarding tank emissions that show emissions from the storage vessels were below 6 tpy uncontrolled. Therefore, the storage vessels are not considered affected units in NSPS OOOOa.

B. General Standards [40 CFR part 60, subpart A and 60.5425a]

1. The General Provisions at 40 CFR part 60, subpart A apply as specified in Table 3 of Subpart OOOOa. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR part 60, subpart A.
2. All reports (except as specified in §60.5420a and §60.5422a) required under 40 CFR part 60, subpart A shall be sent to the EPA at the following address as listed in §60.4:

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

or by email to R8AirReportEnforcement@epa.gov.

C. General Compliance Requirements [40 CFR 60.5370a]

At all times, including during startup, shutdown and malfunction, the Permittee shall maintain and operate the reciprocating compressor affected facility 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.

D. 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).
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).
3. 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 compressor associated with C-5100 has not demonstrated initial compliance because the unit had start-up 8/24/2016 and only operated for 5 days prior to the facility being mothballed on March 22, 2017. When the facility begins operations again MPLX shall comply with these requirements.

E. Equipment Leak Standards for Onshore Natural Gas Processing Plants [40 CFR 60.5400a]

1. The Permittee shall comply with the requirements of §60.482-1a(a), (b) and (d) and §60.482-2a through §60.482-11a, except as provided in §60.5401a. A discussion of the general requirements of §60.482-2a through §60.482-11a are as follows:
 - (a) Pumps in light liquid service shall be monitored monthly to detect leaks as specified by the standards as specified in §60.482-2a(a)-(h). Each pump in light liquid service shall be checked visually for liquids dripping from the pump seal each calendar week. For leaking pumps, a first attempt at repair shall be made no later than 5 days after detection of a leak. Leaking pumps shall be repaired no later than 15 days after detection of a leak. For pumps in light liquid service, an instrument reading of 5,000 parts per million (ppm) or greater for pumps handling polymerizing monomers; or 2,000 ppm or greater for all other pumps is a detected leak. Pumps designated as no detectable emissions (NDE), as indicated by an instrument reading of less than 500 ppm above background, are exempt from monthly monitoring if §60.482-2a(e) is met. However, the NDE designated pumps must be tested annually for compliance with the 500 ppm above background value.
 - (b) Pressure relief devices in gas or vapor service shall be operated as specified by the standards as specified in §60.482-4a(a)-(d). Each pressure relief device in gas or vapor service may be monitored quarterly and within 5 days after a pressure release. If an instrument reading of 500 ppm or greater is measured, a leak is

detected. When a leak is detected, it shall be repaired as soon as practicable but no later than 15 calendar days after the leak is detected. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected. Alternatively, except during pressure releases, each pressure relief device shall be operated as NDE, as indicated by an instrument reading of less than 500 ppm above background. No later than 5 calendar days after the pressure release, the pressure relief device shall be monitored to confirm the condition of no detectable emissions as indicated by an instrument reading of less than 500 ppm above background.

- (c) Open-ended valves or lines shall be equipped to the standards as specified in §60.482-6a(a)-(e).
- (d) Valves in gas/vapor and in light liquid service shall be monitored to detect leaks according to the schedule as specified in §60.482-7a(a)-(h). For leaking valves, a first attempt at repair shall be made no later than 5 days after detection of a leak. Leaking valves shall be repaired no later than 15 days after detection of a leak. For valves in gas/vapor and in light liquid service, an instrument reading of 500 parts per million (ppm) or greater is a detected leak. Valves designated as NDE as indicated by an instrument reading of less than 500 ppm above background, are exempt from monthly and quarterly monitoring if the criteria as specified in §60.482-7a(f) are met. However, the valves must be tested annually for compliance with the 500 ppm above background value.
- (e) If evidence of a potential leak at pumps, valves and connectors in heavy liquid service and pressure relief devices in light liquid or heavy liquid service is found by audio, visual, olfactory (AVO) or any other detection method, the potential leak shall be eliminated as specified by the standards of §60.482-8a(a)-(d). The Permittee shall, no later than 5 days after detection of the potential leak, either remove the indication of the potential leak or monitor the potential leak using Method 21. If an instrument reading of 10,000 parts per million (ppm) or greater is a detected, a leak is detected. For leaking pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and connectors, a first attempt at repair shall be made no later than 5 days after detection of a leak. Leaking equipment shall be repaired no later than 15 days after detection of a leak.
- (f) Closed vent systems and control devices shall be operated as specified by the standards as specified in §60.482-10a(a)-(m) by reducing volatile organic compounds (VOC) emissions vented to them with an efficiency of 95% or greater, or to an exit concentration of 20 ppm by volume, whichever is less stringent. Closed vent systems shall be inspected annually by AVO or using Method 21, depending upon the construction of the closed vent system. AVO indication of a leak or a Method 21 reading greater than 500 ppm is a detected leak. For leaking closed vent system equipment, a first attempt at repair shall be

made no later than 5 days after detection of a leak. Leaking closed vent system equipment shall be repaired no later than 15 days after detection of a leak.

- (g) Connectors in gas/vapor service and in light liquid service shall be monitored to detect leaks according to the schedule as specified in §60.482-11a(a)-(g). For leaking connectors in gas/vapor service and in light liquid service, a first attempt at repair shall be made no later than 5 days after detection of a leak. Leaking connectors in gas/vapor service and in light liquid service shall be repaired no later than 15 days after detection of a leak. For connectors in gas/vapor service and in light liquid service, an instrument reading of 500 parts per million (ppm) or greater is a detected leak.
 - (h) Delay of repair of equipment for which leaks have been detected will be allowed if repair within 15 days is technically infeasible without a process unit shutdown. Repair of this equipment shall occur before the end of the next process unit shutdown. Monitoring to verify repair must occur within 15 days after startup of the process unit as specified in §60.482-9a.
- 2. The Permittee shall comply with the test methods and procedures as specified in §60.485a except as provided in §60.5400a(f).
 - 3. The Permittee shall comply with the recordkeeping and reporting requirements of §60.486a and §60.487a, except as provided in §60.5401a, §60.5421a and §60.5422a.
 - 3. The Permittee shall use the following provision instead of §60.485a(d)(1): Each piece of equipment is presumed to be in VOC service or in wet gas service unless the Permittee demonstrates that the piece of equipment is not in VOC service or in wet gas service. For a piece of equipment to be considered not in VOC service, it must be determined that the VOC content can be reasonably expected never to exceed 10.0% by weight. For a piece of equipment to be considered not in wet gas service, it must be determined that it does not contain or contact the field gas before the extraction step in the process. For purposes of determining the percent VOC content of the process fluid that is contained in or contacts a piece of equipment, procedures that conform to the methods described in ASTM E169–63, 77 or 93, E168–67, 77 or 92, or E260–73, 91 or 96 (incorporated by reference as specified in §60.17) shall be used.

OBSERVATION: Red Wash has been mothballed since March 22, 2017, and the inlet separator/ slug catcher was removed on March 1, 2022 leaving the facility air gapped and blinded. According to information provided by MPLX, the facility was purged with 50 PSI residue gas. The outlet is locked out. Due to the mothball status of the facility, there is no LDAR being performed.

Upon startup, MPLX shall comply with the requirements for LDAR according to their Title V permit and NSPS OOOOa.

The main plant flare, FL-920, is subject to the requirements of Section III.E.1.f above from the Title V permit. MPLX provided information via email on April 21, 2023 documenting that the flare complies with § 60.482-10a(a)-(m) by complying with § 60.18. The heat content of the inlet stream gas was noted as 1,112 Btu/scf with a maximum tip velocity of 38.1 m/s.

F. Exceptions to the Equipment Leak Standards for Affected Facilities at Onshore Natural Gas Processing Plants [40 CFR 60.5401(a)-(g)]

The Permittee may comply with the following exceptions to the provisions of §60.5400a(a) and (b):

1. For each pressure relief device in gas/vapor service, the leak detection and repair requirements specified in §60.5401a(b);
2. For sampling connection systems, the exemption specified in §60.5401a(c);
3. For pumps in light liquid service, valves in gas/vapor and light liquid service, and pressure relief devices in gas/vapor service that are located at a nonfractionating plant that does not have the design capacity to process 283,200 standard cubic meters per day (scmd) (10 million standard cubic feet per day) or more of field gas, the exemptions specified in §60.5401a(d);
4. For determining whether equipment is in heavy or light liquid service, the provisions specified in §60.5401a(f).
5. The Permittee may use the provisions for instrumentation calibration drift as specified in §60.5401a(g) instead of §60.485a(b)(2).

OBSERVATION: Red Wash has been mothballed since March 22, 2017, and the inlet separator/ slug catcher was removed on March 1, 2022 leaving the facility air gapped and blinded. According to information provided by MPLX, the facility was purged with 50 PSI residue gas. The outlet is locked out.

Upon startup, MPLX shall comply with these requirements according to MPLX's Title V permit and NSPS OOOOa.

G. Initial Compliance Requirements for Reciprocating Compressors and Affected Facilities at Onshore Natural Gas Processing Plants [40 CFR 60.5410a(c) and (f)]

1. The Permittee shall achieve initial compliance for the reciprocating compressor affected facility by complying with §§60.5410a(c)(1) - (4).
2. The Permittee shall demonstrate initial compliance with the VOC requirements for onshore natural gas processing plants provided the facility is in compliance with the requirements of §60.5400a as specified by §60.5410a(f).

OBSERVATION: The compressor associated with C-5100 has not demonstrated initial compliance because the unit had start-up 8/24/2016 and only operated for 5 days prior to the facility being mothballed. When the facility begins operations again MPLX shall comply with these requirements.

H. Continuous Compliance Requirements for Reciprocating Compressors and Affected Facilities at Onshore Natural Gas Processing Plants [40 CFR 60.5415a(c) and (f)]

1. The Permittee shall demonstrate continuous compliance for the reciprocating compressors according to §60.5415a(c).
2. The Permittee shall demonstrate continuous compliance with the VOC requirements for onshore natural gas processing plants provided the facility is in compliance with the requirements of §60.5400a as specified by §60.5415a(f).

OBSERVATION: Red Wash has been mothballed since March 22, 2017, and the inlet separator/ slug catcher was removed on March 1, 2022 leaving the facility air gapped and blinded. According to information provided by MPLX, the facility was purged with 50 PSI residue gas. The outlet is locked out.

Upon startup, MPLX shall comply with these requirements according to MPLX's Title V permit and NSPS OOOOa.

I. Notification, Reporting and Recordkeeping Requirements [40 CFR 60.5420a]

The Permittee shall perform the notification, reporting and recordkeeping requirements as specified in §60.5420a, as applicable.

OBSERVATION: Red Wash has been mothballed since March 22, 2017, and the inlet separator/ slug catcher was removed on March 1, 2022 leaving the facility air gapped and blinded. According to information provided by MPLX, the facility was purged with 50 PSI residue gas. The outlet is locked out.

Upon startup, MPLX shall comply with these requirements according to MPLX's Title V permit and NSPS OOOOa. MPLX provided the last reporting period from when the facility operated and was required to submit monitoring reports. A total of 6986 components were found at Red Wash.

No leaks were reportedly found during the September 1, 2016 through February 28, 2017 period and the following notes were submitted regarding the component count:

Valves: 1245

Connectors/Flanges: 5646

Compressors: 12

Pumps: 10

Other: 32

Relief Valves: 41

J. Additional Recordkeeping Requirements for Onshore Natural Gas Processing Plants [40 CFR 60.5421a(a)-(b)]

The Permittee shall comply with the requirements of §60.5421a(b) in addition to the recordkeeping requirements of §60.486a.

OBSERVATION: Red Wash has been mothballed since March 22, 2017, and the inlet separator/ slug catcher was removed on March 1, 2022 leaving the facility air gapped and blinded. According to information provided by MPLX, the facility was purged with 50 PSI residue gas. The outlet is locked out.

Upon startup, MPLX shall comply with these requirements according to MPLX's Title V permit and NSPS OOOOa.

K. Additional Reporting Requirements for Onshore Natural Gas Processing Plants [40 CFR 60.5422a(a)-(c)]

1. The Permittee shall comply with the requirements of §60.487a(a), (b), (c)(2)(i) through (iv), and (c)(2)(vii) through (viii). The semiannual report shall be submitted to the EPA via Compliance and Emissions Data Reporting Interface (CEDRI) as specified in §60.5422a(a).
2. The Permittee shall include the following information in the initial semiannual report in addition to the information required in §60.487a(b)(1) through (4):
 - (a) The number of pressure relief devices subject to the requirements of §60.5401(b) except for those pressure relief devices designated for no detectable emissions under the provisions of §60.482-4a(a); and
 - (b) The number of pressure relief devices complying with §60.482-4a(c).
3. The Permittee shall include the following information in all semiannual reports in addition to the information required in §60.487a(c)(2)(i) through (vi):
 - (a) Number of pressure relief devices for which leaks were detected as required in §60.5401a(b)(2); and
 - (b) Number of pressure relief devices for which leaks were not repaired as required in §60.5401a(b)(3).

OBSERVATION: Red Wash has been mothballed since March 22, 2017, and the inlet separator/ slug catcher was removed on March 1, 2022 leaving the facility air gapped and blinded. According to information provided by MPLX, the facility was purged with 50 PSI residue gas. The outlet is locked out.

Upon startup, MPLX shall comply with these requirements according to MPLX's Title V permit and NSPS OOOOa.

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

A. Applicability [40 CFR 63.6585]

1. 40 CFR part 63, subpart ZZZZ (Subpart ZZZZ) applies to the following emission units:
 - (a) Waukesha L7042GSI 4SRB stationary RICE identified as Emission Unit C302 in Table 2 of this permit; and
 - (b) Waukesha F3524GSI overhead compressor engine identified as Emissions Unit C-5100 in Table 2 of this permit.
2. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of Subpart ZZZZ.

OBSERVATION: Red Wash is an area source of HAP, therefore engine C-5100 and C302 are subject to MACT ZZZZ per §63.6585(c).

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 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 Enforcement and Toxics 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 or via email to:
R8AirReportEnforcement@epa.gov.

C. Requirements for Emissions Unit C-5100 [40 CFR 63.6590(c)(1)]

For Emissions Unit C-5100, the Permittee shall meet the requirements of Subpart ZZZZ by meeting the requirements of Subpart JJJJ, for stationary SI ICE. No further requirements apply to Emissions Unit C-5100 under 40 CFR part 63. The applicable requirements of Subpart JJJJ are specified in Section II of this permit.

OBSERVATION: Pursuant to 63.6590(c)(1), Engine C-5100 complies with NSPS JJJJ. Therefore, C-5100 has no further requirements under MACT ZZZZ.

D. Requirements for Emissions Unit C302 [40 CFR 63.6603(a), (f), and Table 2d]

1. The Permittee, as an owner and operator of existing non-emergency 4SRB stationary RICE with a site rating of more than 500 hp located at area sources of hazardous air pollutants (HAPs) that meet the definition of remote stationary RICE in §63.6675 of Subpart ZZZZ as of October 19, 2013, shall evaluate the status of their stationary RICE every 12 months. The Permittee shall keep records of initial and annual evaluation of the status of the engine. If the evaluation indicates that the stationary RICE no longer meets the definition of remote stationary RICE in §63.6675 of Subpart ZZZZ, the Permittee shall comply with the requirements for existing non-emergency SI 4SRB stationary RICE with a site rating of more than 500 hp located at an area source of HAP that are not remote stationary RICE within 1 year of evaluation.
2. The Permittee shall comply with the requirements listed in Table 2d to Subpart ZZZZ of 40 CFR part 63 listed as follows:
 - (a) The Permittee shall change oil and filter every 2,160 hours of operation or annually, whichever comes first;
 - (b) The Permittee shall inspect spark plugs every 2,160 hours of operation or annually, whichever comes first, and replace as necessary; and
 - (c) The Permittee shall inspect all hoses and belts every 2,160 hours of operation or annually, whichever comes first, and replace as necessary.

OBSERVATION: MPLX provided records that the facility has not operated since 2016. Therefore, maintenance will commence when the facility starts up in the future according to conditions IV.D.2 in this permit.

According to information provided in the September 30, 2022 Six-Month Monitoring Report, Red Wash 24B re-evaluated the status of their stationary RICE on July 18, 2022. Engine C302 remains a remote stationary RICE according to that evaluation.

E. Continuous Compliance Requirements for Emissions Unit C302 [40 CFR 63.6605 and 63.6640(a)]

1. The Permittee shall demonstrate compliance with general requirements according to §63.6605.
2. The Permittee, as the owner and operator of an existing non-emergency 4SRB stationary RICE greater than 500 hp located at an area source of HAP that are remote stationary RICE shall demonstrate continuous compliance with each requirement in Table 2d to this

subpart that apply according to the following work or management practices as specified in Table 6, section 9:

- (a) Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or
- (b) Develop and follow a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

OBSERVATION: MPLX provided records that the facility has not operated since 2016. Therefore, maintenance will commence when the facility starts up in the future according to conditions IV.E 1 and 2 in this permit.

F. Notification, Reporting and Recordkeeping Requirements for Emissions Unit C302 [40 CFR 66.6645, 63.6650, 63.6655(a), (e)(3), and 63.6660]

- 1. The Permittee must submit notifications as specified in §63.6645.
- 2. The Permittee must submit reports as specified in §63.6650.
- 3. The Permittee shall keep a copy of each notification and report submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status submitted according to the requirement in §63.10(b)(2)(xiv).
- 4. The Permittee shall keep records of the occurrence and duration of each malfunction of operation or the air pollution control and monitoring equipment.
- 5. The Permittee shall keep records of all required maintenance performed on the air pollution control and monitoring equipment.
- 6. The Permittee shall keep records of action taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
- 7. The Permittee shall keep records of maintenance conducted on the stationary RICE in order to demonstrate that the stationary RICE and after-treatment control device (if any) were operated and maintained according to the Permittee's maintenance plan.
- 8. The Permittee shall keep records in the format and for the duration as specified in §63.6660.

OBSERVATION: MPLX has submitted Six-Month Monitoring Reports and Title V Annual Compliance Certifications that include reports that satisfy these requirements while the facility is mothballed. See Table 4 below.

V. Chemical Accident Prevention – 40 CFR Part 68 [40 CFR 68.10(a) and 40 CFR 68.215(a)(ii)]

1. A Permittee of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR part 68 no later than the latest of the following dates:
 - (a) June 12, 1999; or
 - (b) Three years after the date on which a regulated substance is first listed under 40 CFR 68.130; or
 - (c) The date on which a regulated substance is first present above a threshold quantity in a process.
2. The Permittee shall certify compliance with all requirements of 40 CFR part 68, including the registration and submission of the Risk Management Plan, as part of the annual compliance certification required by 40 CFR part 71.

OBSERVATION: MPLX provided a copy of the Risk Management Plan in an email on April 21, 2023. According to the Risk Management Plan, there have been no onsite or offsite accidents within the previous five years. The facility maintains a written Emergency Action Plan to protect worker and public safety as well as the environment.

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 of this permit.

OBSERVATION: MPLX provided Mr. LeCortz both records requested during the onsite inspection on March 23, 2023 and electronically via email on April 21, 2023.

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 April 1st and October 1st of each year. The report due on April 1st shall cover the 6-month period ending on the last day of February before the report is due. The report due on October 1st shall cover the 6-month period ending on the last day of August 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>]

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 10 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: The following semi-annual (SIXMON) and Title V Annual Compliance Certification reports have been submitted to EPA for Red Wash since 2019. No deviations have been reported. The facility has been mothballed, and has not operated, since 2016.

Table 4: Title V Semi-Annual (SIXMON) and Title V Annual Compliance Certifications for Red Wash 24B Gas Plant

Reporting Period	Report Type	Report Date	Date Received	Notes
March 1 - August 21, 2019	SIXMON	9/26/2019	9/30/2019	* Plant has not operated since late 2016; mothballed indefinitely. *Amine unit(s) has been removed. *NSPS KKK Semi-Annual LDAR Reports filed in CEDRI although plant has been mothballed indefinitely with residue (non-VOC) gas. *Initial NSPS JJJ performance test on Engine C-5100 has yet to be conducted as unit only operated for 5 days in November 2016 and hasn't operated since (facility startup August 24, 2016); testing will be conducted when facility begins routine operation

				in future. * No deviations reported.
September 1, 2019 - February 29, 2020	SIXMON	4/1/2020	4/1/2020	* Plant has not operated since late 2016; mothballed indefinitely. * Amine unit has been removed. * Facility transitioned from NSPS KKK to NSPS OOOOa in August 2016. Plant not operational during reporting period but semiannual LDAR report filed in CEDRI [date?]. * NSPS JJJJ - engine C-5100 initial test not yet conducted as engine not operated since initial startup in November 2016. * NSPS OOOOa - applicability occurred on 8/24/2016 when C-5100 was added as a new unit, and C301 and C302 migrated to NSPS OOOOa applicability at the same time along with the entire plant. Runtime continuously monitored to determine rod packing replacement schedule. * No deviations during reporting period.
March 1, 2019 - February 29, 2020	TVACC	4/1/2020	4/1/2020	* Plant has not operated since late 2016; mothballed indefinitely. * Amine unit no longer in service. * NSPS KKK Semi-Annual LDAR Reports submitted to CEDRI in September 2019 and March 23, 2020. * LDAR conducted per requirements of NSPS OOOOa (transitioned from KKK to OOOOa effective August 2016). * Two deviations reported: C301 and C302 runtime hours for rod packing replacement tracking inadvertently omitted from (1) annual NSPS OOOOa report submitted 10/29/2019 and (2) semiannual (SIXMON) monitoring report submitted 9/26/2019
March 1 - August 31, 2020	SIXMON	9/28/2020	9/28/2020	* Plant shut down in November 2016; has not operated since. * NSPS JJJJ - engine C-5100 initial test not yet conducted as engine not operated since initial startup in November 2016. * Facility transitioned from NSPS KKK to NSPS OOOOa effective August 24, 2016. Plant not operational during reporting period but semiannual LDAR report filed in CEDRI [date?]. * MACT ZZZZ remote stationary RICE determination for C-302 conducted 8/17/2020; concludes remains remote stationary RICE. * No deviations reported.

March 1, 2020 - February 28, 2021	TVACC	3/30/2021	3/30/2021	* Plant has not operated since late 2016; mothballed indefinitely. * LDAR conducted per requirements of NSPS OOOOa (transitioned from KKK to OOOOa effective August 2016). NSPS OOOOa Semi-Annual LDAR Reports submitted to CEDRI on March 23, 2020, September 17, 2020, and March 9, 2021. * Initial NSPS JJJJ performance test on Engine C-5100 has yet to be conducted as unit only operated for 5 days in November 2016 and hasn't operated since (facility startup August 24, 2016); testing will be conducted when facility begins routine operation in future. * Initial MACT ZZZZ performance tests on engines C302 and C-5100 not yet conducted; will be conducted when the facility begins routing operation in the future. * RMP last updated and submitted on 5/28/2019. * Reported continuous compliance with all permit conditions. * No deviations reported.
September 1, 2020 - February 28, 2021	SIXMON	3/30/2021	3/30/2021	* Plant shut down in November 2016; has not operated since. * NSPS JJJJ - engine C-5100 is a new RICE; not yet tested since facility not operational since initial startup. * NSPS OOOOa - C-5100 applicability occurred on 8/24/2016; C301 and C302 migrated to NSPS OOOOa applicability at the same time along with the entire plant. Runtime continuously monitored to determine when rod packing replacement required. Plant transitioned from NSPS KKK to NSPS OOOOa, effective 8/24/2016. LDAR semi-annual monitoring reports for plant submitted to CEDRI on 9/17/2020 and 3/9/2021. * MACT ZZZZ - remote status evaluation for engine C302 conducted 8/17/2020; no maintenance conducted during reporting period since engine non-operational * No deviations reported.
March 1, 2021 - February 28, 2022	TVACC and SIXMON	3/30/2022	3/30/2022	* Plant shut down in November 2016; has not operated since. * No deviations reported. * ACC and SIXMON submitted together.

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)

U.S. Environmental Protection Agency
FOIA and Miscellaneous Payments
Cincinnati Finance Center
P.O. Box 979078
St. Louis, Missouri 63197-9000

For non-U.S. Postal Service express mail

U.S. Bank
Government Lockbox 979078
U.S. EPA FOIA & Misc. Payments
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 Red Wash for the 2017-2022 reporting years are displayed in Table 5, below. The facility has been mothballed, and has not operated, since 2016.

Table 5: Annual Fees Received for Red Wash

Reporting Year	Fee Paid
2017	\$0.00
2018	\$0.00
2019	\$0.00
2020	\$0.00
2021	\$0.00
2022	\$0.00

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.

[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.]

OBSERVATION: Annual emissions reports received by the EPA for Red Wash are displayed in Table 6, below. Reports for calendar years 2017, 2018, 2019, 2020, 2021 and 2022 were received on April 2, 2018, April 2, 2019, April 1, 2020, March 30, 2021 and March 30, 2022 respectively.

Table 6: Annual Emissions Reported for Red Wash 24B

Pollutant	2017	2018	2019	2020	2021	2022
NO _x	0.0	0.0	0.0	0.0	0.0	0.0
VOC	0.0	0.0	0.0	0.0	0.0	0.0
SO ₂	0.0	0.0	0.0	0.0	0.0	0.0
PM ₁₀	0.0	0.0	0.0	0.0	0.0	0.0
Lead	0.0	0.0	0.0	0.0	0.0	0.0
Total HAPs	0.0	0.0	0.0	0.0	0.0	0.0

TOTAL EMISSIONS	0.0	0.0	0.0	0.0	0.0	0.0
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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; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- (b) 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.
- (c) 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 April 1st, 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 4, p21.

D. Duty to Provide and Supplement Information [40 CFR 71.6(a)(6)(v), 71.5(a)(3), and 71.5(b)]

1. The Permittee shall furnish to the EPA, within a reasonable time, any information that the EPA may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the EPA copies of records that are required to be kept pursuant to the terms of the permit, including information claimed to be confidential. Information claimed to be confidential must be accompanied by a claim of confidentiality according to the provisions of 40 CFR part 2, subpart B.
2. The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information. In addition, a Permittee shall provide additional information as necessary to address any requirements that become applicable after the date a complete application is filed, but prior to release of a draft permit.

E. Submissions [40 CFR 71.5(d), 71.6(c)(1) and 71.9(h)(2)]

1. Any document (application form, report, compliance certification, etc.) required to be submitted under this permit shall be certified by a responsible official as to truth,

accuracy, and completeness. Such certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

[Explanatory note: the EPA has developed a reporting form “CTAC” for certifying truth, accuracy and completeness of Part 71 submissions. The form may be found on the EPA’s website at: <https://www.epa.gov/title-v-operating-permits/epa-issued-operating-permits/>]

All fee calculation worksheets and applications for renewals and permit modifications shall be submitted to:

Part 71 Permit Contact, Air Permitting and Modeling Branch, 8ARD-PM
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop Street
Denver, Colorado 80202

2. Except where otherwise specified, all reports, test data, monitoring data, notifications, and compliance certifications shall be submitted to:

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

OBSERVATION: MPLX has submitted timely reports for Red Wash 24B.

F. Severability Clause [40 CFR 71.6(a)(5)]

The provisions of this permit are severable, and in the event of any challenge to any portion of this permit, or if any portion is held invalid, the remaining permit conditions shall remain valid and in force.

G. Permit Actions [40 CFR 71.6(a)(6)(iii)]

This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

H. Administrative Permit Amendments [40 CFR 71.7(d)]

The Permittee may request the use of administrative permit amendment procedures for a permit revision that:

1. Corrects typographical errors;

2. Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
3. Requires more frequent monitoring or reporting by the Permittee;
4. Allows for a change in ownership or operational control of a source where the EPA determines that no other change in the permit is necessary, provided that a written agreement containing a

specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittee has been submitted to the EPA;
5. Incorporates into the Part 71 permit the requirements from preconstruction review permits authorized under an EPA-approved program, provided that such a program meets procedural requirements substantially equivalent to the requirements of 40 CFR 71.7 and 71.8 that would be
6. applicable to the change if it were subject to review as a permit modification, and compliance requirements substantially equivalent to those contained in 40 CFR 71.6; or
7. Incorporates any other type of change which the EPA has determined to be similar to those listed in (1) through (5) above.

[Note to Permittee: If 1 through 5 above do not apply, please contact the EPA for a determination of similarity prior to submitting your request for an administrative permit amendment under this provision.]

OBSERVATION: No permit amendments have been requested.

I. Minor Permit Modifications [40 CFR 71.7(e)(1)]

1. The Permittee may request the use of minor permit modification procedures only for those modifications that:
 - (a) Do not violate any applicable requirement;
 - (b) Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
 - (c) Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
 - (d) Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed

to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:

- (i) A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I; and
 - (ii) An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the CAA;
 - (e) Are not modifications under any provision of Title I of the CAA; and
 - (f) Are not required to be processed as a significant modification.
2. Notwithstanding the list of changes ineligible for minor permit modification procedures in 1 above, minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in an applicable implementation plan or in applicable requirements promulgated by the EPA.
3. An application requesting the use of minor permit modification procedures shall meet the requirements of 40 CFR 71.5(c) and shall include the following:
- (a) A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
 - (b) The source's suggested draft permit;
 - (c) Certification by a responsible official, consistent with 40 CFR 71.5(d), that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
 - (d) Completed forms for the permitting authority to use to notify affected states as required under 40 CFR 71.8.
4. The source may make the change proposed in its minor permit modification application immediately after it files such application. After the source makes the change allowed by the preceding sentence, and until the permitting authority takes any of the actions authorized by 40 CFR 71.7(e)(1)(iv)(A) through (C), the source must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time period, the source need not comply with the existing permit terms and conditions it seeks to modify. However, if the source fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it.
5. The permit shield under 40 CFR 71.6(f) may not extend to minor permit modifications.

OBSERVATION: No permit modifications have been requested.

J. Significant Permit Modifications [40 CFR 71.7(e)(3), 71.8(d), and 71.5(a)(2)]

1. The Permittee must request the use of significant permit modification procedures for those modifications that:
 - (a) Do not qualify as minor permit modifications or as administrative amendments;
 - (b) Are significant changes in existing monitoring permit terms or conditions; or
 - (c) Are relaxations of reporting or recordkeeping permit terms or conditions.
2. Nothing herein shall be construed to preclude the Permittee from making changes consistent with Part 71 that would render existing permit compliance terms and conditions irrelevant.
3. Permittees must meet all requirements of Part 71 for applications, public participation, and review by affected states and tribes for significant permit modifications. For the application to be determined complete, the Permittee must supply all information that is required by 40 CFR 71.5(c) for permit issuance and renewal, but only that information that is related to the proposed change.

OBSERVATION: No permit modifications have been requested.

K. Reopening for Cause [40 CFR 71.7(f)]

The permit may be reopened and revised prior to expiration under any of the following circumstances:

1. Additional applicable requirements under the CAA become applicable to a major Part 71 source with a remaining permit term of three or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to 40 CFR 71.7(c)(3);
2. Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the EPA, excess emissions offset plans shall be deemed to be incorporated into the permit;
3. The EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
4. The EPA determines that the permit must be revised or revoked to assure compliance

with the applicable requirements.

L. Property Rights [40 CFR 71.6(a)(6)(iv)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

M. Inspection and Entry [40 CFR 71.6(c)(2)]

1. Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow the EPA or an authorized representative to perform the following:
2. Enter upon the Permittee's premises where a Part 71 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
3. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
4. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
5. As authorized by the CAA, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

N. Transfer of Ownership or Operation [40 CFR 71.7(d)(1)(iv)]

A change in ownership or operational control of this source may be treated as an administrative permit amendment if the EPA determines no other change in this permit is necessary and provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittee has been submitted to the EPA.

O. Off Permit Changes [40 CFR 71.6(a)(12) and 40 CFR 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:

1. Each change is not addressed or prohibited by this permit;
2. Each change shall meet with all applicable requirements and shall not violate any existing permit term or condition;
3. Changes under this provision may not include changes subject to any requirement of 40 CFR parts 72 through 78 or modifications under any provision of Title I of the CAA;

4. The Permittee must provide contemporaneous written notice to the EPA of each change, except for changes that qualify as insignificant activities under 40 CFR 71.5(c)(11). The written notice must describe each change, the date of the change, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change;
5. The permit shield does not apply to changes made under this provision;
6. The Permittee must keep a record describing all changes that result in emissions of any regulated air pollutant subject to any applicable requirement not otherwise regulated under this permit, and the emissions resulting from those changes;
7. The notice shall be kept on site and made available to the EPA on request, in accordance with the general recordkeeping provision of this permit; and
8. Submittal of the written notice required above shall not constitute a waiver, exemption, or shield from applicability of any applicable standard or PSD permitting requirements under 40 CFR 52.21 that would be triggered by the change.

P. Permit Expiration and Renewal [40 CFR 71.5(a)(1)(iii), 71.5(a)(2), 71.5(c)(5), 71.6(a)(11), 71.7(b), 71.7(c)(1), and 71.7(c)(3)]

1. This permit shall expire upon the earlier occurrence of the following events:
 - (a) Five (5) years elapse from the date of issuance; or
 - (b) The source is issued a Part 70 or Part 71 permit under an EPA-approved or delegated permit program.
2. Expiration of this permit terminates the Permittee's right to operate unless a timely and complete permit renewal application has been submitted at least 6 months but not more than 18 months prior to the date of expiration of this permit.
3. If the Permittee submits a timely and complete permit application for renewal, consistent with 40 CFR 71.5(a)(2), but the EPA has failed to issue or deny the renewal permit, then all the terms and conditions of the permit, including any permit shield granted pursuant to 40 CFR 71.6(f) shall remain in effect until the renewal permit has been issued or denied.
4. The Permittee's failure to have a Part 71 permit is not a violation of this part until the EPA takes final action on the permit renewal application. This protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit any additional information identified as being needed to process the application by the deadline specified in writing by the EPA.
5. Renewal of this permit is subject to the same procedural requirements that apply to initial permit issuance, including those for public participation, affected state, and tribal review.

6. The application for renewal shall include the current permit number, description of permit revisions and off permit changes that occurred during the permit term, any applicable requirements that were promulgated and not incorporated into the permit during the permit term, and other information required by the application form.

APPENDIX A: Site Overview



APPENDIX B: Photo Log

File Name	Description	Photographer
DC_3187	Inlet to facility blind flanged	M. Stovern
DC_3188	Active Koda Middlefork Energy pipeline construction	M. Stovern