

Wexpro Company – Island Compressor Station
Full Compliance Evaluation (FCE)
On-Site Inspection

Inspection Date: September 18, 2024

Inspection Report Date: October 21, 2024

EPA Representatives: [REDACTED], Environmental Scientist, US EPA Region 8
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Tribal Representatives: [REDACTED]

Company Representatives: [REDACTED]
[REDACTED]

Inspection Report Prepared By: [REDACTED] Environmental Scientist, Air and Toxics
Enforcement Branch, US EPA Region 8

Inspection Report Reviewed By: [REDACTED]

Last Inspection: June 23, 2022

Operating Status: Operating

Applicable Requirements: Title V; 40 CFR Part 63 National Emissions Standards for
Hazardous Pollutants, Subpart ZZZZ (MACT ZZZZ);
40 CFR Part 63, Subpart HH (MACT HH);
40 CFR Part 60 Standards of Performance for New Stationary
Sources, Subpart JJJJ (NSPS JJJJ); Consent Decree Case No. 2:08-
CV-00167-TS-PMW

Permit Number: V-UO-000011-2018.00
Replaces Permit Number: V-UO-000011-2006.00

Issue Date: April 23, 2020
Effective Date: May 23, 2020
Expiration Date: May 23, 2025

Facility Information and Emission Unit Identification

Parent Company Name: Wexpro Company
Mailing Address: P.O. Box 45003, Salt Lake City, Utah 84115
Facility Contact: [REDACTED]

Facility Operator & Name: Wexpro Company – Island Compressor Station
Facility Location: Latitude 39.960006, Longitude -109.717009

County, State: Uintah, Utah
Reservation: Uintah and Ouray Indian Reservation
Tribe: Ute Indian Tribe
Responsible Official: Vice President and General Manager
SIC Code: 1311 – Crude Petroleum and Natural Gas
ICIS ID: 49-047-00108

Other CAA Permits: There are no other CAA permits for this facility. See below in Section VII.D.5 for discussion on a permit modification to incorporate the like-kind engine replacement of C100 with C200.

Enforcement History

Questar Gas Management Company, a prior owner of the Island Compressor Station, 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 multiple compressor stations in the Uinta Basin, including the Island Compressor Station. The Consent Decree was terminated on June 4, 2014 (see Appendix B); however, several requirements survived termination of the decree. (See Section V of this report.)

The EPA issued a Notice of Violation (NOV) to MPLX LP (MPLX) on November 22, 2019, which included alleged violations of MACT HH and MACT ZZZZ at the Island Compressor Station for:

- (1) failing to conduct periodic performance testing on combustor C-1, in violation of the testing requirements at 40 CFR § 63.772(e)(3)(vi), the control device performance requirements at 40 CFR §§ 63.771(d)(1)(i), 63.772(f), and 63.773(d)(5)(i), and the requirements of Paragraph II.D of Title V operating permit number V-UO-000011-2006.00 (and Paragraph II.D of Title V operating permit number V-UO-000011-2018.00); and
- (2) failing to timely submit results of MACT ZZZZ performance tests for engine C100 at the Island Compressor Station, in violation of the reporting requirements at 40 CFR § 63.7(g)(1).

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

Inspection Findings/Areas of Concern

Emissions were detected by EPA inspectors for a second inspection in a row from the thief hatch on the flash tank from the dehydration system. WexPro should consider enhanced monitoring of the thief hatch on the flash tank/TEG knockout tank of the dehydration unit or attempt to find a more permanent solution to reduce the failures of this emissions source. Wexpro confirmed the thief hatch was repaired on September 27, 2024 via email to EPA inspectors along with an OGI video.

EPA has concerns that the compressor engine C200 monthly pressure baseline appears to vary in the maintenance record reports. The baseline pressure, as measured in inches of water, should only change upon catalyst replacement. The EPA reviewed engine maintenance record reports that had varied baseline pressures in each measurement compared to what was provided while during the onsite inspection. According to information provided by Wexpro, the catalyst had not been replaced between tests. Although there does not appear to be a requirement to record baseline pressures, the catalyst should be operated and maintained according to manufacture specifications. If Wexpro is using baseline pressure to monitor catalyst performance then it should be followed accordingly to ensure proper operation.

EPA inspectors saw continuous from the C200 blowdown vent, which should have evacuated emissions as part of the engine shut-in earlier in the day prior to EPA's onsite inspection. Wexpro representatives believed a valve repair might be necessary, however the valves to the blowdown vent pipe were serviced in March, 2024. WexPro made multiple attempts to repair the leaking valves and shut-in the compressor station on October 4,

2024 in an attempt to minimize emissions and fix the issue. On October 14, 2024, WexPro provided IR videos showing the valve was repaired and returned the components back to service successfully. WexPro stated that the unit does not leak both while the compressor is operating and while the unit is shut-in.

Lastly, EPA advised WexPro to consider back pressure regulators on ECD's to allow for more complete combustion of emissions being routed to a control device. This is not a permit requirement and is only being included in this section for informational purposes.

Compliance Assistance

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

Description of Operations

The Island Compressor Station receives a comingled stream containing natural gas, condensate, and produced water from surrounding well sites via pipelines. The natural gas and condensate undergo a natural separation process in the inlet separator that separates natural gas from the natural gas condensate. The natural gas condensate is routed to two 400-barrel condensate tanks (Units T-1 and T-2 in Table 3), and produced water is periodically drained into the 210-barrel produced water tank (Unit T-5 in Table 3). Vapor from the tanks is routed to a combustor (Unit C-1 in Table 3). The natural gas is routed to the compressor (Unit C200 in Table 3, the previous unit C100 was removed and EPA was notified on July 27, 2021), where it is compressed from field pressure to approximately 1,000 pounds per square inch gauge (psig). The compressed natural gas flows through a discharge cooler to cool it to 120 °F before passing into the triethylene glycol (TEG) dehydrator (Unit D-1 in Table 3) to remove water to meet pipeline specifications. The dehydrated natural gas is then routed to the natural gas sales pipeline. The rich TEG exits the contactor and is depressurized in a TEG flash tank. The emissions from the flash tank are routed to control devices (Units FL-2 and C-1 in Table 3). The depressurized TEG is routed to and regenerated using heat in a vessel called a glycol reboiler. The regenerated lean TEG is circulated back to the contactor. The natural gas condensate and produced water are transported off site by tanker trucks. There are fugitive emissions associated with the potential seeping of natural gas from connections, seals, flanges and valves. GEN3 is utilized on site for instrument air for the pneumatic equipment like pumps and controllers.

See Appendix A of this report for an aerial image of the facility.

General Inspection Observations and Commentary

On September 18, 2024 at 11:49 AM, EPA representatives and Ute Tribe Air Program representatives met with WexPro representatives onsite at the Island Compressor Station. An opening conference was conducted, during which EPA inspectors presented credentials and EPA inspectors informed WexPro representatives that the site would be surveyed using a 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. WexPro representatives then conducted a job safety analysis and then facility walkthrough for the inspection.

According to information provided by WexPro during the inspection, Island was shut in besides a generator providing electricity to the facility. No throughput of the facility occurred and the inlet and outlet were shut-in. The only functional compressor engine, C200, was shut down since the morning according to WexPro personnel. A new engine was being installed and WexPro provided a copy of a permit modification request (not reviewed during this inspection report because the engine or components were disconnected from the process stream and unable to operate) showing proof of notification for the project. The facility was shut-in because the outlet discharge exceeded 1170 psi, and therefore Island could not increase pressure to the sales gas pipeline beyond that capacity. EPA confirmed that there are two- 400 bbl condensate/oil tanks onsite, one-210 bbl produced water tank, and one- 100 bbl TEG knockout tank. The condensate and produced water tanks are trucked out approximately once per week for loadout.

C200 was confirmed off, and the new engine was confirmed disconnected from the gas stream. The new engine is a Waukesha L7042GSI, serial number WAU-1654195, manufacture date was July, 2024. During the walkthrough EPA inspectors also viewed the control devices. The ECD and flare, controlling tank and dehydration unit emissions, operate without a backpressure regulator. EPA advised WexPro that the use of a backpressure regulator allows for a more complete destruction of emissions routed to the unit (not a permit requirement). EPA inspectors could not see visible flame in the ECD sight glass however viewed the control panel for the ECD showing the temperature was varying between 645°F and 700°F during the inspection. The flare was not operating.

Details of the FLIR video taken during the inspection are found in Appendix B. Continuous emissions visible in IR from the FLIR camera were observed while EPA inspectors were on site from the thief hatch of the flash tank from the dehydration unit. EPA inspectors also saw continuous emissions from rod packing. WexPro representatives believed the rod packing emissions were from a vent pipe attached the used oil skid and no follow up was required, which was confirmed via email on September 26, 2024. Lastly, EPA inspectors saw continuous from the C200 blowdown vent, which should have evacuated emissions as part of the engine shut-in earlier in the day prior to EPA’s onsite inspection. Wexpro representatives believed a valve repair might be necessary, however the valves to the blowdown vent pipe were serviced in March, 2024. WexPro made multiple attempts to repair the leaking valves and shut-in the compressor station on October 4, 2024. On October 14, 2024, WexPro provided IR videos showing the valve was repaired and returned the components back to service successfully. WexPro stated that the unit does not leak both while the compressor is operating and while the unit is shut-in.

EPA and Ute Tribe representative met with WexPro representatives for a brief closing conference. A confidential business information (CBI) warning was presented to WexPro representatives, and no CBI was claimed. During the closing conference, EPA inspectors discussed the leaks discovered onsite from the dehydration unit knockout tank, rod packing for C200, and the C200 blowdown vent pipe. EPA and tribal staff departed the facility at 12:39 PM. An email to request relevant compliance-related information and records was sent to Katherine Brown on August 21, 2024. Katherine provided the requested information to EPA via email on September 3, 2024, September 26, 2024, October 8, 2024, and October 14, 2024.

Potential to Emit (PTE)

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

See Table 2, below, for facility-wide and emission unit-specific potential to emit data for the Island Compressor Station, as reported in the Statement of Basis for Permit No. V-UO-000011-2018.00. The PTE totals below include reductions from legally and practically enforceable requirements set forth in the Title V permit, including a federal Consent Decree (See Section V, below). Table 2 also contains the total PTE for all insignificant emissions units. The Title V Operating Permit Program at 40 CFR Part 71 (Part 71) allows the Permittee to separately list in the permit application units or activities that qualify as “insignificant” based on potential emissions below 2 tons per year (tpy) for all regulated pollutants that are not listed as hazardous air pollutants (HAP) under section 112(b) and below 1,000 lbs/year or the de minimis level established under section 112(g), whichever is lower, for HAP.

**Table 2: Potential to Emit in Tons Per Year (tpy)
Island Compressor Station**

Emission Unit Id.	Regulated Air Pollutants (tpy)							
	NO _x	CO	VOC	PM	SO ₂	CH ₂ O	Total HAPs	CO ₂ e
C100^a (Removed)	114.33	71.46	5.46	1.13	0.03	0.17	0.51	6,835
C200	14.29	25.58	2.72	1.09	0.03	0.17	0.49	7,474
GEN3	1.71	3.42	1.2	0.13	0.004	0.410	0.49	906
D-1 ^b	-	-	1.85	-	-	-	0.87	33
R-1	0.11	0.09	0.01	0.01	0.001	8.5E-05	0.002	128
T-1 & T-2	-	-	0.11	-	-	-	0.01	6
HTR1	0.21	0.18	0.01	0.02	0.001	< 0.0005	0.004	256
HTR2	0.21	0.18	0.01	0.02	0.001	< 0.01	0.002	256
HTR3	0.11	0.09	0.01	0.01	0.001	< 0.0005	0.002	128
GP	-	-	0.48	-	-	-	0.02	214
T-3 – T-9	-	-	1.53	-	-	-	-	-
LO	-	-	0.29	-	-	-	-	-
EL	-	-	2.28	-	-	< 0.03	0.31	173
ESD	-	-	0.17	-	-	-	0.01	-
ES	-	-	0.03	-	-	-	0.002	4
CB	-	-	0.79	-	-	-	0.04	137
FL-1	0.23	0.07	0	-	-	0	0	204
C-1	0.04	0.01	0	-	-	0	0	37
TOTAL^c	16.27	32.09	7.15	1.22	0.04	0.58	2.18	9,956

^a Based on enforceable emission limits of 8.0 g/hp-hr for NO_x and 5.0 g/hp-hr for CO in the Consent Decree Case No. 2:08-CV-00167-TS-PMV.

^b Based on enforceable requirement of a 95% reduction of VOC emissions in National Emissions Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities, 40 CFR Part 63, Subpart HH.

^c Total emissions based on the removal of C100.

NO_x - oxides of nitrogen
SO₂ - sulfur dioxide

CO - carbon monoxide
CO₂ - carbon dioxide

VOC - volatile organic compounds
HAP - hazardous air pollutants

PM - particulate matter

Permit Number V-UO-000011-2018.00 Requirements and Compliance Status

Inspector notes discussing compliance status will follow each relevant permit requirement in **bold blue** font. It should be noted that although the permit requirements below are presented as they are contained in the current permit (V-UO-000011-2018.00), which became effective May 23, 2020, the requirements were also contained in the previous permit (V-UO-000011-2006.00). Therefore, the requirements described in the sections below are relevant to the entire period covered by this full compliance evaluation.

I. Facility Emission Points and Unit-Specific Information

Table 3: Source Emission Points

Emission Unit ID	Description	Control Equipment
C100 (Removed July 2021)	Waukesha 7042GSI; 1,480 hp* 4-Stroke Rich-Burn Reciprocating Internal Combustion Engine Natural Gas Fired Serial No. C 14977/1 Installed: 9/2004	AFR* and NSCR*
C200 (Installed August 2021)	Waukesha 7042GSI-S4; 1,480 hp* 4-Stroke Rich-Burn Reciprocating Internal Combustion Engine Natural Gas-Fired	AFR and NSCR

	Serial No. WAU-1452825 Installed: July 2021 Mfg*: July 2021 EPA inspectors confirmed the serial numbers and engine information matched C200 as permitted during the onsite inspection.	
GEN3	Caterpillar G3306B; 203 hp 4-Stroke Rich-Burn Reciprocating Internal Combustion Engine Natural Gas-Fired Serial No. BC800104 Installed: 11/9/2018 Mfg: 9/22/2014 EPA inspectors confirmed the serial numbers and engine information matched GEN3 as permitted during the onsite inspection.	AFR and NSCR
D-1	15 MMscfd* Tri-ethylene glycol (TEG) Dehydrator	Flare (FL-1) (Combustor backup, C-1)
R-1	0.25 MMBtu/hr* TEG Reboiler	None (IEU)
T-1 T-2	400 bbl* Condensate Tanks with 4,000 bbls per year Annual Condensate Throughput	Combustor (C-1)
HTR1 HTR2	0.5 MMBtu/hr Tank Heaters	None (IEU)
HTR3	0.25 MMBtu/hr Tank Heater	None (IEU)
GP	Gas-driven pump	None (IEU)
	Miscellaneous Chemical Storage Tanks	
T-3 T-4 T-5 T-6 T-7 T-8 T-9	100 bbl Knockout Tank 100 bbl Distillate Tank 210 bbl Produced Water Tank 12 bbl New Glycol Tank 12 bbl Used Glycol Tank 12 bbl New Lube Oil Tank 12 bbl Used Lube Oil Tank	None (IEU)
LO	Truck Loadout	None (IEU)
EL	Equipment Leaks	None (IEU)
ESD	Emergency Shutdowns	None (IEU)
ES	Engine Start-ups	None (IEU)
CB	Compressor Blowdowns	None (IEU)
FL-1	Elevated Open-Flame Flare with 53 scf/hr Pilot Flow Rate and 0.06 MMBtu/hr Flare Heat Input	None
C-1	Enclosed Combustor with 17 scf/hr Pilot Flow Rate and 0.02 MMBtu/hr Heat Input	None

* hp = horsepower; Mfg = Manufactured; MMscfd = million standard cubic feet per day; MMBtu/hr = million British thermal units per hour; IEU = insignificant emission unit; bbl = barrel; AFR = air-to-fuel ratio controller; NSCR = non-selective catalytic reduction; scf/hr = standard cubic feet per hour

Table 4: Requirements for Emission Units

Equipment	Applicable Requirements	Limitations	Monitoring	
			Method	Interval
C100 (July 2021) (1) 1,480 hp Waukesha 7042GSI	MACT ZZZZ	NSCR & AFR reducing CH ₂ O emissions by 76% or more	Performance test CPMS*: Catalyst Inlet Temp. and ΔP	Initial & upon catalyst replacement Continuous
	Consent Decree (CD)	NO _x = 8.0 g/hp-hr CO = 5.0 g/hp-hr	Performance test	Semi-Annual

C200 (Installed August 2021) (1) 1,480 hp Waukesha 7042GSI-S4	NSPS JJJJ	NO _x = 1.0 g/hp-hr or 82 ppmvd at 15% O ₂ CO = 2.0 g/hp-hr or 270 ppmvd at 15% O ₂ VOC = 0.7 g/hp-hr VOC or 60 ppmvd at 15% O ₂	Performance Test	Initial
	Consent Decree (CD)	NO _x = 8.0 g/hp-hr CO = 5.0 g/hp-hr	Performance test	Semi-Annual
GEN3 (1) 203 hp Caterpillar G3306B	NSPS JJJJ	NO _x = 1.0 g/hp-hr or 82 ppmvd at 15% O ₂ CO = 2.0 g/hp-hr or 270 ppmvd at 15% O ₂ VOC = 0.7 g/hp-hr VOC or 60 ppmvd at 15% O ₂	Performance Test	Initial
	MACT ZZZZ	Compliance with NSPS JJJJ equates to compliance with MACT ZZZZ.	N/A	N/A
D-1 15 MMscfd Glycol Dehydrator	MACT HH Consent Decree (CD)	Flare reducing VOC emissions by 95% or more; backup combustor reducing VOC emissions by 95% or more	Presence of pilot light	Continuous
			No visible emissions	Continuous
			Performance Test (on C-1)	Initial and Periodic (every 60 months)
T-1, T-2 400 bbl Condensate Tanks	Consent Decree (CD)	Emissions controlled by combustor	Presence of pilot light	Continuous

^a CPMS = Continuous Parametric Monitoring System

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

A. Applicability [40 CFR § 60.4230]

1. 40 CFR Part 60, Subpart JJJJ applies to the following emissions unit:
 - (a) Caterpillar G3306B 4SRB RICE identified as GEN3 in Table 2 of this permit; and
2. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR Part 60, Subpart JJJJ.

OBSERVATION: GEN3 is a spark ignition (SI), internal combustion engine (ICE) with a maximum engine power less than 500 hp that was constructed after June 12, 2006 and manufactured on or after July 1, 2008; therefore, pursuant to 40 CFR § 60.4230(a)(4)(iii), NSPS JJJJ applies.

GEN3 was installed on November 9, 2018 as a like-kind replacement for the existing 203-hp Caterpillar G3306, which was called emission unit GEN2 in the previous permit (V-UO-000011-2006.00) for the Island Compressor Station. GEN2 was manufactured on December 19, 1998; therefore, GEN2 was not subject to the requirements of NSPS Subpart JJJJ.

Additionally, C200 was installed August 2021. C200 is a SI ICE with a maximum engine power greater than 500 hp and was constructed after June 12, 2006 and manufactured after July 1, 2007 therefore, pursuant to 40 CFR § 60.4230(a)(4)(i), NSPS JJJJ applies. This Title V permit does not contain the requirements of C200 however a permit modification was submitted to incorporate those requirements. We will also include discussion on compliance applicable requirements within this inspection report.

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

1. The Permittee shall comply with the emissions standards for non-emergency, spark ignition (SI) internal combustion engines (ICE) greater than or equal to 100 hp and less than 500 hp, for GEN3, 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: Pursuant to 40 CFR § 60.4233(e) and NSPS JJJJ Table 1, since GEN3 is a non-emergency SI ICE with a maximum engine power of 203 hp that was manufactured on or after January 1, 2011, both GEN3 and C200 must meet the following emission standards:

Engine GEN3 (manufacture date on or after July 1, 2010)

NO_x: 1.0 g/hp-hr or 82 ppmvd at 15% O₂

CO: 2.0 g/hp-hr or 270 ppmvd at 15% O₂

VOC: 0.7 g/hp-hr VOC or 60 ppmvd at 15% O₂

Engine C200 (manufacture date on or after July 1, 2010)

NO_x = 1.0 g/hp-hr

CO = 2.0 g/hp-hr

VOC = 0.7 g/hp-hr

Performance tests results since the last inspection indicate compliance with the NSPS JJJJ emission standards. (See Table 4)

Results of the performance tests conducted since the previous inspection report are displayed in Table 5, below, and are within the allowable limits for NO_x, CO, and VOC. A catalyst replacement for C200 occurred on May 13, 2023.

Table 5: Results of NSPS JJJJ Performance Testing

Emission Unit	S/N	Test Date	NO _x Test Results	NO _x Limit	CO Test Results	CO Limit	VOC Test Results	VOC Limit
			(g/hp-hr)		(g/hp-hr)		(g/hp-hr)	
C200	WAU-1452825	8/16/2022	0.5	1.0	0.2	2.0	0.1	0.7
C200	WAU-1452825	8/16/2023	0.3	1.0	0.5	2.0	0.05	0.7
C200	WAU-1452825	12/5/2024	0.4	1.0	0.2	2.0	0.00	0.7

D. Compliance Requirements [40 CFR § 60.4243(b)]

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 40 CFR Part 60, 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 manufacturer's emission-related written instructions, the Permittee shall keep records of conducted maintenance to demonstrate compliance, but no performance testing is required. The Permittee shall also meet requirements as specified in 40 CFR 1068 Subparts A through D, as applicable. If the Permittee adjusts engine settings according to and consistent with the manufacturer's instructions, the stationary SI ICE will not be considered out of compliance; or
 - (b) If the Permittee does not operate and maintain the certified stationary SI ICE and control device according to the manufacturer's 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 25 hp and less than or equal to 500 hp, the Permittee shall keep a maintenance plan and records of conducted maintenance and shall, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, the Permittee shall conduct an initial performance test to demonstrate compliance.

OBSERVATION: GEN3 is a non-certified engine; therefore, Wexpro must comply with the requirements at § 60.4243(b)(2)(i) for owners or operators of stationary SI ICE greater than 25 hp and less than or equal to 500 hp. Pursuant to § 60.4243(b)(2)(i), the permittee shall keep a maintenance plan and records of conducted maintenance, and an initial performance test must be conducted to demonstrate compliance. MPLX, the previous owner, conducted an initial performance test on GEN3 on October 29, 2019 which showed compliance with the requirements. GEN3 was installed on November 9, 2018; therefore, the test was conducted within one year of engine startup. During this compliance evaluation, Katherine submitted maintenance records for GEN3 and C200. Documents indicate that maintenance is scheduled to be conducted on GEN3 at regularly scheduled intervals of 720 hours, 2,000 hours, 4,000, 8,000 and 24,000 hours.

OBSERVATION: C200 is a non-certified engine; therefore, Wexpro must comply with the requirements at § 60.4243(b)(2)(ii) for owners or operators of stationary SI ICE greater than or equal to 500 hp. Pursuant to § 60.4243(b)(2)(ii), the permittee shall keep a maintenance plan and records of conducted maintenance, and an initial performance test must be conducted to demonstrate compliance. Pursuant to § 60.4243(b)(2)(ii), Wexpro shall comply with the requirement to conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first, thereafter to demonstrate compliance. See above for NSPS JJJJ C200 engine performance tests conducted after the initial performance test, showing compliance with the emission limitations. Wexpro conducted each test within 8,760 hours of operation. Additionally, documents indicate that maintenance is scheduled to be conducted on GEN3 at regularly scheduled intervals of 720 hours, 2,000 hours, 4,000 hours, and 8,000 hours.

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

The Permittee shall comply with the performance testing requirements for the non-emergency, SI ICE greater than or equal to 100 hp and less than 500 hp, as specified in §§ 60.4244 (a)-(f), for emissions unit GEN3.

OBSERVATION: An initial performance test to demonstrate compliance with NSPS JJJJ was conducted on GEN3 on October 29, 2019; three 1-hour test runs were conducted. An approved test method was used to conduct the performance test. No further testing has been triggered or required.

OBSERVATION: A performance test to demonstrate compliance with NSPS JJJJ was conducted on C200 on August 16, 2022 and August 16, 2023; three 1-hour test runs were conducted for each performance test using ASTM D6348-03. Pursuant to § 60.4243(b)(2)(ii), C200 is required to conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first, thereafter to demonstrate compliance. An approved test method was used to conduct the initial and subsequent performance tests.

F. Notification, Reports and Records [40 CFR § 60.4245]

The Permittee shall comply with all of the applicable notification, reporting, and recordkeeping requirements for the non-emergency, SI ICE greater than or equal to 100 hp and less than 500 hp, as specified in § 60.4245, for emissions unit GEN3, except that the reports of required performance tests shall be submitted with the respective semiannual report required in Section VI.B.1. of the permit that corresponds with the reporting period within which the test was conducted.

OBSERVATION: Copies of maintenance records and records of the hours of operation recorded through the non-resettable hour meter were submitted to the EPA upon request. According to meter information submitted by WexPro, the total runtime on GEN3 as of August 7, 2024 was 47,966 hours. During the previous inspection, records showed a total runtime on GEN3 by June 1, 2022 was 29,172

hours.

OBSERVATION: Results of the performance tests on C200 were submitted to the EPA within 60 days after the test was completed, pursuant to the requirements at § 60.4245(d). Copies of maintenance records and records of the hours of operation recorded through the non-resettable hour meter were submitted to the EPA upon request. According to meter information submitted by WexPro, the total runtime on C200 as of August 7, 2024 was 23,976 hours.

III. 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(b)(1)(i)]

1. 40 CFR Part 63, Subpart HH applies to the 15 MMscfd glycol dehydrator identified as D-1, and control devices FL-1 and C-1.
2. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart HH for affected sources located at a major source of hazardous air pollutants (HAP).

OBSERVATION: The glycol dehydrator meets the definition of large glycol dehydration unit at 40 CFR § 63.761. Per Paragraph 15 of the Consent Decree Case No. 2:08-CV-00167-TS, the Island Compressor Station is considered a major source of HAPs under MACT HH. Emissions from the glycol dehydrator (D-1) are routed to the flare (FL-1) or combustor (C-1); therefore, FL-1 and C-1 are subject to the relevant control device requirements in MACT HH.

B. General Standards [40 CFR § 63.764]

1. The General Provisions at 40 CFR Part 63, Subpart A apply as specified in Table 2 of 40 CFR Part 63, Subpart HH. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart A.
3. Except as specified in § 63.764(e), the Permittee shall comply with the following requirements for the glycol dehydrator:
 - (a) The control requirements for glycol dehydrator process vents specified in § 63.765;
 - (b) The monitoring requirements specified in § 63.773; and
 - (c) The recordkeeping and reporting requirements specified in §§ 63.774 and 63.775.
4. At all times the Permittee must operate and maintain any glycol dehydrator, 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. [40 CFR § 63.764(j)]

OBSERVATION: A flare (FL-1) is used as the primary control device for the glycol dehydrator; the enclosed combustor (C-1) is used as a backup control device for the flare. Per the requirements of the

federal consent decree, during periods of time when the flare is down, emissions from D-1 are to be routed to a backup combustor (C-1). Control device downtime is reported in semiannual MACT HH reports. (See Table 7 for details.) A total of approximately 92 hours of flare downtime was reported for the period of January 1, 2023 through June 30, 2024; during those hours, emissions were reported as being routed to the combustor with the combustor operating properly.¹

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

The Permittee shall comply with the glycol dehydration unit process vent standards and control equipment requirements as follows:

1. Except as specified in § 63.765(c), the Permittee shall comply with the applicable requirements for large glycol dehydration process vents at major sources of HAP specified in § 63.765(b)(1) and (2).
 - (a) For each large glycol dehydration process vent, the Permittee shall control air emissions by either paragraph (b)(1)(i) or (ii) of § 63.765.
 - (i) The Permittee shall connect the process vent to a control device or combination of control devices through a closed-vent system, the closed-vent system shall be designed and operated in accordance with the requirements of § 63.771(c). The control device² shall be designed and operated in accordance with the requirements of § 63.771(d); or
 - (ii) The permittee shall connect the process vent to a control device or combination of control devices through a closed-vent system and the outlet benzene emissions from the control device(s) shall be reduced to a level less than 0.90 megagrams per year. The closed-vent system shall be designed and operated in accordance with the requirements of § 63.771(c). The control device shall be designed and operated in accordance with the requirements of § 63.771(d), except that the performance levels specified in § 63.771(d)(1)(i) and (ii) do not apply; and
 - (b) One or more safety devices that vent directly to the atmosphere may be used on the air emission control equipment installed to comply with paragraph (b)(1) of § 63.765.

OBSERVATIONS: The dehydration unit at the Island Compressor Station is considered a large dehydration unit, so the requirements of 40 CFR § 63.771(d) apply. The Island Compressor Station uses control devices rather than process modifications to comply with the MACT HH glycol dehydration unit process vent standards, so it complies with the standards at 40 CFR § 63.765(b) rather than § 63.765(c)(2).

As specified at § 63.771(c), emissions from the dehydration unit are routed via a closed vent system (CVS) to the flare or combustor. According to information provided by Wexpro in its MACT HH semiannual report covering the January 1, 2023 through June 30, 2024 period, the most recent CVS inspection one (1) equipment leak detected; first attempt at repair on the same day was reported by Wexpro as

¹ Wexpro reported in previous inspections and while onsite during this inspection that, as a safeguard, a valve is installed that closes and does not allow glycol to circulate in the dehydrator if the combustor is not operating.

² Provision III.C.1(a)(i) of permit V-UO-000011-2018.00 states that “[t]he closed vent system shall be designed and operated in accordance with the requirements of § 63.771(d); however, § 63.771(d) contains control device requirements for sources except small glycol dehydration units. Therefore, compliance of control devices is evaluated for this provision. Compliance of the closed-vent system is evaluated for provision § 63.771(c).

successfully repaired. The dehydration unit shall operate with no detectable emissions according to 40 CFR 63.771(c)(1) and (2) and does not contain a bypass device according to previous inspection reports and thus 40 CFR 63.771(c)(3) is not applicable.

Pursuant to 40 CFR § 63.771(d)(1)(iii), the flare must be designed and operated in accordance with the requirements of 40 CFR § 63.11(b). The presence of a pilot light in the flare is continuously monitored via a thermocouple. Pursuant to 40 CFR §§ 63.771(e)(1)(i) and (e)(2), no performance test on the flare is required.

The combustor, C-1, at the facility is utilized as a backup control when the flare is non-operational and the dehydration unit is still operating. Under MACT HH, a control device on a large dehydrator must demonstrate compliance with one of the compliance options at § 63.771(d)(1)(i) by meeting one of the performance requirements at § 63.772(e). Pursuant to § 63.772(e)(3), to determine compliance with the control device HAP reduction requirements at § 63.771(d)(1)(A), an initial performance test shall be conducted within 180 days after the compliance date for an affected source, and subsequent periodic performance tests shall be conducted no later than 60 months after the initial or preceding periodic performance test. The requirement to conduct periodic performance testing does not apply to (1) sources whose control device model is tested under and meets the criteria of § 63.772(h) (manufacturers' performance test) or to (2) a device that demonstrated, through performance testing, that combustion zone temperature is an indicator of destruction efficiency and that operates at a minimum temperature of 1,400°F. (See 40 CFR § 63.772(e)(3)(vi)(B)(1) and (2).) According to information provided by Wexpro in its MACT HH semiannual report covering the March 2 – June 30, 2020 period (prior to this inspection), the Island Compressor Station does not operate a control device whose model was tested under § 63.772(h); therefore, periodic testing applies to the backup combustor, C-1.

On December 8, 2020, Wexpro conducted the initial performance test of the combustor C-1 to demonstrate compliance with the control device total organic compound (TOC) or total HAP reduction requirements at § 63.771(d)(1)(A). The results are below in Table 6. A subsequent performance test will be due no later than 12/8/2025. An approved test method was used to conduct the performance test.

Table 6: Performance Test Results

Emission Unit ID	Test Date(s)	TOC Destruction Efficiency (%)	NESHAP TOC Destruction Efficiency (%)	Pass/Fail
C-1	12/8/2020	98.5%	95%	Pass

OBSERVATION: Emissions were detected by EPA inspectors for a second inspection in a row from the thief hatch on the flash tank from the dehydration system. WexPro should consider enhanced monitoring of the thief hatch on the flash tank/TEG knockout tank of the dehydration unit or attempt to find a more permanent solution to reduce the failures of this emissions source. Wexpro confirmed the thief hatch was repaired on September 27, 2024 via email to EPA inspectors.

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

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

2. The permittee shall comply with the closed-vent system requirements specified in § 63.771(c).
3. For each control device, FL-1 and C-1, the Permittee shall comply with the applicable control device requirements to reduce HAP emissions as specified in § 63.771(d).

OBSERVATION: See Section III.C, above, which includes a discussion of compliance with these requirements.

OBSERVATION: Emissions were detected by EPA inspectors for a second inspection in a row from the thief hatch on the flash tank from the dehydration system. WexPro should consider enhanced monitoring of the thief hatch on the flash tank/TEG knockout tank of the dehydration unit or attempt to find a more permanent solution to reduce the failures of this emissions source. Wexpro confirmed the thief hatch was repaired on September 27, 2024 via email to EPA inspectors.

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

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

1. The Permittee shall determine the glycol dehydration unit flowrate, benzene emissions or BTEX emissions as specified in § 63.772(b).
2. The Permittee shall comply with the test procedures for no detectable emissions in accordance with Method 21, 40 CFR Part 60, Appendix A, as specified in § 63.772(c).
3. The Permittee shall comply with the test procedures for control device performance for FL-1 and C-1 as specified in § 63.772(e).
4. The Permittee shall comply with the compliance demonstration for control device performance requirements for FL-1 and C-1 as specified in § 63.772(f).

OBSERVATION: Since the facility is using a flare to control emissions from the dehydrator, it is required to meet the provisions in § 63.772(e)(2), which require the owner or operator to design and operate the flare in accordance with the requirements of § 63.11(b). According to information provided by Wexpro in a previous inspection, the Flameco flare appears to comply by having an exit velocity below 60 ft/sec as required by 40 CFR 63.11(b)(7)(i), no operational changes were reported by Wexpro since the previous inspection. Compliance determinations are to be made according to Method 22 of 40 CFR Part 60, Appendix A, for visible emissions. In the information provided as part of this compliance evaluation, documents indicated that Wexpro performs Method 22 readings approximately every 6 months, and no visible emissions have been observed from FL-1 or C-1 since Wexpro obtained ownership of the Island Compressor Station.

Pursuant to § 63.773(e)(1)(i), no performance tests are required to be conducted on the flare.

When the dehydration unit is operating and the flare is down, emissions from the glycol dehydrator, D-1, are routed to the combustor, C-1. Therefore, C-1 is considered a control device under MACT HH. As stated in the observations in Section III.C and Table 6 above, a performance test showing compliance with the requirements has been conducted on the combustor as of December 8, 2020, as required by §§ 63.771(d)(1)(i)(A) and 63.772(e).

F. Inspection and Monitoring Requirements [40 CFR § 63.773]

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

OBSERVATION: The inspection and monitoring requirements specified in 40 CFR § 63.773(c) require an initial inspection to demonstrate that the closed-vent system operates with no detectable emissions. The initial inspection was conducted more than five years ago so is not applicable to this compliance evaluation. Pursuant to § 63.773(c)(2), annual visual inspections for defects of the closed-vent system and cover and annual Method 21 inspections on the closed-vent system are also required. Results of annual inspections were submitted with the MACT HH semiannual reports. Visual inspections of the closed-vent system and cover and Method 21 inspections are conducted annually, see Table 7 of this compliance evaluation below for results of those inspections conducted by Wexpro.

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

OBSERVATION: Pursuant to the requirements of 40 CFR § 63.773(d), the presence of a pilot light is continuously monitored via a thermocouple in the flare and enclosed combustor. Wexpro indicated during previous inspection reports and in MACT HH, SIXMON and TVACC reports that it has installed a redundant backup data system to ensure that data is collected and stored.

40 CFR § 63.773(d)(1)(iii) requires a CPMS performance evaluation at least once every 12 months. Documents submitted to the EPA by Wexpro indicate that CPMS performance evaluations are conducted annually in October.

G. Recordkeeping Requirements [40 CFR § 63.774]

1. The recordkeeping provisions of 40 CFR Part 63, Subpart A, that apply and those that do not apply to the Permittee are listed in Table 2 of 40 CFR Part 63, Subpart HH.
2. The Permittee shall maintain the records specified in §§ 63.774(b), (c), (e), and (g).
3. Except as specified in §§ 63.774(c), the Permittee shall maintain the records specified in § 63.774(b).

OBSERVATION: The facility logs and maintains records through paper logs and a SCADA system. Hard copy records are stored at a local, off-site field station, and SCADA data and reports are maintained electronically.

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).

OBSERVATION: According to information provided by Wexpro during the previous inspection, the Island Compressor Station does not elect to demonstrate compliance with the benzene emission limit; therefore, the records at § 63.774(c) are not required.

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

OBSERVATION: The facility maintains records for the flare, FL-1, as required by § 63.774(e). Records of periods when the pilot flame is absent are submitted with periodic reports, and SCADA data for FL-1 and C-1 were submitted to the EPA in MACT HH, SIXMON and TVACC reports.

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

OBSERVATION: Records of malfunctions and corrective actions were submitted with periodic reports.

H. Reporting Requirements [40 CFR § 63.775]

1. The reporting provisions of subpart A of this part, that apply and those that do not apply to the Permittee are listed in Table 2 of this subpart.
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 Initial Notification required by § 63.775(b) and the Notification of Compliance Status required by § 63.775(d) were submitted prior to the last full compliance evaluation. The facility submits semiannual periodic MACT HH reports as required by § 63.775(e). The semiannual reports provide information on excess emissions, CPMS downtime, flare and combustor downtime, dehydrator operation time, and closed vent system inspections. Pursuant to the requirements of § 63.775(f), process changes are to be reported within 180 days after the process change is made or as a part of the next periodic report, whichever is sooner. Based on the information provided by Wexpro, no process changes have taken place at the Island Compressor Station since the previous full compliance evaluation.

Table 7, below, contains details of the semiannual MACT HH reports submitted since the previous inspection.

Table 7: MACT HH Semiannual Periodic Reports

Reporting Period	Report Date	Notes*
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1/1/2023 – 6/30/2023	7/26/2023	• Reported that last CMS certification or audit conducted 10/20/2022. • Reported 4111.9 total source operating hours (dehy runtime) in reporting period (flow time from discharge meter). • Reported no CMS downtime, inoperative periods, out-of-control periods, or malfunctions. • Reported no changes to CMS, processes, or controls. • Reported that annual cover and CVS inspection and monitoring conducted 11/1/2022. No equipment leaks observed or detected. • Reported no flare downtime.
7/1/2021 – 12/31/2022	1/25/2024	• Reported 10/12/2023 as last CMS certification or audit date. • 3873.67.17 total source operating hours (dehy runtime) in reporting period. • Reported no CMS downtime, inoperative periods, out-of-control periods, or malfunctions. • Reported no changes to CMS, processes, or controls. • Reported that annual cover and CVS inspection and monitoring conducted 10/6/2023. One equipment leak detected; first attempt at repair same day, and successfully repaired within the same day. • No flare downtime.
1/1/2024 – 6/30/2024	7/26/24	• Reported that last CMS certification or audit conducted 10/12/2023. • Reported 4191.9 total source operating hours (dehy runtime) in reporting period (flow time from discharge meter). • Reported no CMS downtime, inoperative periods, out-of-control periods, or malfunctions. • Reported no changes to CMS, processes, or controls. • Reported that annual cover and CVS inspection and monitoring conducted 10/26/2022. No equipment leaks reported. • Reported 92 hours of flare downtime. During the flare downtime, Wexpro reported that the backup combustor was on and functioning correctly to control emissions.

* CPMS = Continuous Parametric Monitoring System; CVS = Closed Vent System

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

A. Applicability [40 CFR § 63.6585]

1. 40 CFR Part 63, Subpart ZZZZ applies to the following emission units:
 - (a) Waukesha 7042GSI engine identified as C100; and
 - (b) Caterpillar G3306B engine identified as GEN3;
2. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart ZZZZ.

OBSERVATION: C100 was removed from the facility and replaced with C200.

Due to enforceable limitations on emissions because of MACT HH and MACT ZZZZ, HAP emissions at the Island Compressor Station were limited to less than major source levels at the time GEN3 was

installed at the facility. Pursuant to § 63.6590(a)(2)(iii), engine GEN3 is a new (constructed on or after June 12, 2006), 4SRB natural gas-fired RICE located at an area source of HAP emissions.

Wexpro continues to submit MACT ZZZZ reports for C200 and conducts performance tests to comply with the MACT ZZZZ CH₂O Emission Limit of 350 ppbvd @ 15% O₂. EPA reported the results of those performance tests in this full compliance evaluation.

C. Emission and Operating Limitations [40 CFR §§ 63.6600, 63.6605, and 63.6590]

1. The Permittee shall comply with the emission limitations and operating limitations for stationary 4SRB RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions, specified in § 63.6600 for engine C100.
2. Pursuant to § 63.6590(c), the Permittee shall comply with the requirements of 40 CFR Part 63, Subpart ZZZZ for engine GEN3 by meeting the requirements of 40 CFR Part 60, Subpart JJJJ. No further requirements apply for this engine under 40 CFR Part 63, Subpart ZZZZ.
3. Pursuant to § 63.6600, compliance with the numerical emission limitations for stationary 4SRB RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions established in 40 CFR Part 63, Subpart ZZZZ, for engine C100, shall be based on the results of testing the average of three 1-hour runs using the testing requirements and procedures in § 63.6620 and Table 4 to 40 CFR Part 63, Subpart ZZZZ.
4. The Permittee must be in compliance with the emission limitations and operating limitations that apply to C100 at all times, as specified in § 63.6605(a).
5. The Permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times. The general duty to minimize emissions does not require the Permittee to make any further efforts to reduce emissions if the required levels have been achieved. Determination of whether such operations 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 source as specified in § 63.6605(b).

OBSERVATIONS:

C100: C100 was removed from the facility prior to the previous inspection and therefore was not assessed for compliance during this full compliance evaluation.

GEN3 and C200: Pursuant to § 63.6590(c)(1), GEN3 and C200 must meet the requirements of MACT ZZZZ by meeting the requirements of 40 CFR Part 60, Subpart JJJJ. No further requirements apply to GEN3 under MACT ZZZZ. See Section II for a discussion of NSPS JJJJ compliance for engine GEN3.

Wexpro continues to submit MACT ZZZZ reports for C200 and conducts performance tests to comply with the MACT ZZZZ CH₂O Emission Limit of 350 ppbvd @ 15% O₂. EPA reported the results of those performance tests in this full compliance evaluation.

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

1. The Permittee shall conduct the initial performance tests and other compliance demonstrations requirements for stationary 4SRB RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions, as specified in § 63.6610 for engine C100.
2. The Permittee shall conduct subsequent performance tests for stationary 4SRB RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions, as specified in § 63.6615, for engine C100.
3. The Permittee shall use the performance tests and other procedures for stationary 4SRB RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions, as specified § 63.6620, for engine C100.
4. The Permittee shall comply with the monitoring, installation, collection, operation and maintenance requirements for stationary 4SRB RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions, as specified in § 63.6625, for engine C100.
5. The Permittee shall demonstrate initial compliance with the emission limitations, operating limitations, and other requirements that apply to stationary 4SRB RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions, as specified in § 63.6630, for engine C100.

OBSERVATION: If subject to MACT ZZZZ, pursuant to § 63.6615, subsequent performance tests on engine C200 must be conducted according to Table 3 of MACT ZZZZ, and, as specified in § 63.6640(b), if the catalyst is changed, the operating parameters must be reestablished and a performance test conducted to demonstrate that the applicable emission limitation is being met. Wexpro reported that catalyst replacement took place on engine C200 on May 13, 2023.

See Table 8 for details of MACT ZZZZ tests conducted since the previous full compliance evaluation.

Table 8: Results of MACT ZZZZ Performance Testing

Emission Unit	S/N	Test Date	Avg. CH ₂ O (ppbvd @ 15% O ₂)	MACT ZZZZ CH ₂ O Emission Limit (ppbvd @ 15% O ₂)	Average Load	Catalyst Inlet Temp. (°F)	Catalyst ΔP ^a (inches H ₂ O)
C200 ^b	WAU-1452825	5/16/2023	4	350	80.3%	859	1.6
C200 ^b	WAU-1452825	6/24/2024	19	350	67.7%	909	3.2

^a Δ P = differential pressure (pressure drop)

^b C100 was replaced with C200 in July and August 2021. EPA is including the results for informational purposes only.

OBSERVATION: If subject to MACT ZZZZ, EPA is reiterating the findings from the previous 2022 inspection report that WexPro's maintenance records do not show consistent monthly pressure baseline readings. The baseline appears to vary in the maintenance record reports provided by WexPro. The baseline pressure, as measured in inches of water, should only change upon catalyst replacement. Although there does not appear to be a requirement to record baseline pressures, the catalyst should be operated and maintained according to manufacture specifications. If Wexpro is using baseline pressure to monitor catalyst performance then it should be followed accordingly to ensure proper operation.

E. Continuous Compliance Requirements [40 CFR §§ 63.6635 and 63.6640]

1. The Permittee shall monitor and collect data to demonstrate continuous compliance for stationary 4SRB RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions, as specified in § 63.6635, for engine C100.
2. The Permittee shall demonstrate continuous compliance with the emission limitations, operating limitations, and other requirements for stationary 4SRB RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions, as specified in § 63.6640, for engine C100.

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

1. The Permittee shall submit notifications as specified in § 63.6645 for engine C100.
2. The Permittee shall submit reports as specified in § 63.6650 for engine C100.
3. The Permittee shall keep records as specified in § 63.6655 for engine C100.
4. The Permittee shall keep the records in the format and for the duration as specified in § 63.6660 for engine C100.

OBSERVATION: All required MACT ZZZZ semiannual reports have been submitted since the previous inspection. As required by 40 CFR § 63.6650 and Table 7 to 40 CFR Part 63, Subpart ZZZZ, Wexpro submitted the required semiannual compliance reports for engine C200. See Table 9, below, for details.

Table 9: MACT ZZZZ Semiannual Compliance Reports

Reporting Period	Report Date	Notes*
1/1/2023 – 6/30/2023	7/26/2023	• No malfunctions reported. • No deviations reported. • No CPMS out-of-control or inoperative periods reported. • Total operating time C200: 4137 hours
7/1/2023 – 12/31/2023	1/25/2024	• No malfunctions reported. • No deviations reported. • No CPMS out-of-control or inoperative periods reported. • Total operating time C200: 4150 hours
1/1/2024 – 6/30/2024	7/25/2024	• No malfunctions reported. • No deviations reported. • No CPMS out-of-control or inoperative periods reported. • Total operating time C200: 4188 hours

* CPMS = Continuous Parametric Monitoring System

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

A. Applicability

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

OBSERVATION: The Consent Decree was terminated on 6/4/2014. (See Appendix C for a copy of the signed termination order.) However, based on Section XVII of the Consent Decree, the requirements set forth in Paragraphs 17, 19, 20 and 23 of the Consent Decree survived termination and were incorporated in the reissued Title V operating permit, number V-UO-000011-2018.00.

B. Requirements for the Glycol Dehydrator

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

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

- (a) The flare installed pursuant to Paragraph 15 of the Consent Decree shall achieve a 95% by weight or greater reduction of volatile organic compound (VOC) emissions for the glycol dehydrator process vent stream at all times except during periods of time when the pilot flame at the flare is off, the Permittee shall re-light the pilot flame or route emissions from the glycol dehydrator process vent stream to a backup combustor as expeditiously as practicable. The backup combustor shall achieve a 95% by weight or greater reduction of VOC emissions from the glycol dehydrator process vent stream when in use, as determined by the pilot flame on the combustor being on when in use. The time period during which the glycol dehydrator is operated without either: (1) a flare with the pilot flame on; or (2) the backup combustor with its pilot flame on shall not exceed 500 hours. Nothing in Paragraph 17 of the Consent Decree shall affect the Permittee's obligation to meet the applicable requirements of 40 CFR Part 63.
- (b) Compliance with 40 CFR §63.11(b), and with the associated monitoring and recordkeeping required in 40 CFR §63.773(d)(3)(i)(C), §63.774(b) and §63.774(e) shall be sufficient to determine compliance with the 95% VOC reduction requirement of Paragraph 17 of the Consent Decree.

OBSERVATION: Compliance with MACT HH requirements equate to compliance with the monitoring and recordkeeping requirements of Consent Decree Paragraph 17. As noted in the Enforcement History the EPA issued a NOV to MPLX in November 2019 for failure to comply with MACT HH control requirements at the Island Compressor Station. WexPro conducted a stack test of the combustor on December 8, 2020 to demonstrate initial compliance and those results can be found in Table 6.

C. Requirements for the Condensate Storage Tanks

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

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

- (a) The Permittee shall, within 30 days of the Effective Date of the Consent Decree, connect the condensate storage tank, identified as T-1 and T-2 in this permit, to an existing or new combustor at the source.
- (b) The Permittee shall, within 60 days of the Effective Date of the Consent Decree, certify to the EPA that the design of the conveyance systems from the condensate storage tanks to the combustor does not, under normal operating conditions, cause or contribute to a release of VOCs from the condensate storage tank through thief hatches or pressure relief valves.

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

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

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

OBSERVATION: Emissions from the condensate storage tanks (T-1 and T-2) are routed to an enclosed combustor (C-1) for control. The presence of a pilot flame is continuously monitored with a thermocouple and recorded via a SCADA system.

A total of approximately 1 hours of combustor downtime was reported for the period of January 1, 2023 through June 30, 2023; during that time the facility was shut down. During the period between January 1, 2024 through June 30, 2024 Wexpro had 2 hours where the combustor was shown as down (with temperatures below 200°F), however the average temperature reported by Wexpro was above 600°F.

D. Requirements for RICE

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

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

For RICE with a site rating of 500 hp or greater operated at the facility, identified as engine C100³ in this permit, the Permittee shall comply with the requirements specified below:

(a) Emissions Control:

The Permittee has installed and is operating an AFR and NSCR control device on each rich-burn RICE. The rich-burn RICE at Island, identified as C100 in this permit, shall not exceed 8.0 grams per horsepower hour (g/hp-hr) for NO_x and 5.0 g/hp-hr for CO.

OBSERVATION: C200 is equipped with an AFR and NSCR control system. Results of semi-annual performance tests for NO_x and CO conducted since the last full compliance evaluation appear to be within the allowable limits. See Table 11 below.

(b) Emissions Controls Maintenance:

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

OBSERVATION: See table 10 below for oxygen sensor replacement information.

Table 10: Oxygen Sensor Replacements on Engine C100 and C200

Engine ID	Date of Replacement	Engine Hours	Sensor replaced within 2,000 hours (Y/N)
C200	February 23, 2022	3,865	Y
C200	May 19, 2022	5,772	Y
C200	August 10, 2022	7,413	Y
C200	November 2, 2022	9,354	Y
C200	January 25, 2023	11,232	Y
C200	March 1, 2023	12,053	Y
C200	April 20, 2023	13,244	Y

³ C200 has been installed and is subject to the CD requirements.

C200	June 22, 2023	14,598	Y
C200	July 26, 2023	15,340	Y
C200	October 11, 2023	17,069	Y
C200	January 3, 2024	18,999	Y
C200	March 27, 2024	20,943	Y
C200	May 2, 2024	21,805	Y
C200	June 25, 2024	22,996	Y

(c) Performance Testing for NO_x and CO:

- (i) Not later than 180 days after the Effective Date of the Consent Decree, the Permittee shall conduct initial performance tests for NO_x and CO emissions, on each RICE, using the test protocol selected from the list in paragraph iv below.
- (ii) The Permittee shall retest each reciprocating internal combustion engine semi-annually using the test protocols developed from the test methods specified above. The Permittee shall submit to EPA the test results for NO_x and CO with the semi-annual report required pursuant to 40 CFR Part 63, Subpart ZZZZ.
- (iii) Performance tests must be conducted at any load condition within plus or minus 10% of 100% load unless the reciprocating internal combustion engine cannot achieve plus or minus 10% of 100% load at the time of the test. Under such circumstances, the reciprocating internal combustion engine shall be tested at maximum achievable load, and the differential pressure across the catalyst shall be monitored and shall be maintained consistent with operating limitations in 40 CFR Part 63, Subpart ZZZZ. If the reciprocating internal combustion engine load is increased by 20% or greater averaged over a 30-day period commencing within 60 days of the last test, then the reciprocating internal combustion engine shall be re-tested at the newly achievable maximum load and the corresponding differential pressure established. For the purposes of this provision regarding engine load during and after performance testing, the Permittee shall monitor and record load at each engine.
- (iv) The Permittee shall select among the following test methods: 40 CFR Part 60, appendix A, Method 1 or 1A - Sampling port location and number of traverse points; 40 CFR Part 60, Appendix A, Method 3, 3A or 3B - O₂ concentration at inlet and outlet; 40 CFR Part 60, Appendix A, Method 4 - Moisture Content; 40 CFR Part 60, Appendix A, Method 7E – Determination of nitrogen oxides emissions; or 40 CFR Part 60, Appendix A, Method 10 – Determination of carbon monoxide emissions.

OBSERVATION: Results of required semi-annual performance tests are displayed in Table 11, below.

Table 11: Results of Semi-Annual NO_x and CO Performance Testing for Engine C200

Emission Unit	S/N	Test Date	Avg. NO _x	NO _x Limit	Avg. CO	CO Limit	Avg. Engine Load	Catalyst ΔP ⁺ (inches H ₂ O)	Catalyst Inlet Temp (°F)
			(g/hp-hr)		(g/hp-hr)				
C200	WAU-1452819	8/16/2022	0.5	8.0	0.2	5.0	74%	1.2	850
C200	WAU-	5/16/2023	0.2	8.0	0.2	5.0	80.3%	1.6	859

	1452825								
C200	WAO-1452819	8/16/2023	0.3	8.0	0.5	5.0	80%	2.4	888
C200	WAO-1452819	12/5/2023	0.4	8.0	0.2	5.0	71.7%	2.0	874
C200	WAO-1452819	6/24/2024	0.2	8.0	0.2	5.0	67.7%	3.2	909

* ΔP = differential pressure (pressure drop)

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

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

- Records shall be kept of off permit changes, as required by the Off Permit Changes section of this permit.

OBSERVATION: See Section VII.D, below, for a discussion of the minor permit modification that has taken place at the Island Compressor Station.

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

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

OBSERVATION: Table 12, details the semi-annual reports that have been submitted to the EPA for the Island Compressor Station since the previous inspection.

Table 12: Title V Semi-Annual (SIXMON) Reports for Island Compressor Station

Reporting Period	Report Date	Notes*
1/1/2023 – 6/30/23	7/26/2023	• No deviations reported
7/1/2023 – 12/31/2023	1/25/2023	• No deviations reported
1/1/2024 – 6/30/2024	7/26/2024	• No deviations reported

* CPMS = Continuous Parametric Monitoring System

- "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 situation where emissions exceed an emission limitation or standard;
 - 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 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 must 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 must 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 must notify 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 must 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 must 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 the permit.

OBSERVATION: See Table 12, for deviations reported in semi-annual reports since the previous inspection.

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.

OBSERVATION: Annual fees received for the Island Compressor Station for the 2020 and 2021 reporting years are displayed in Table 13.

Table 13: Annual Fees Received for the Island Compressor Station

Date of Submission	Reporting Year	Fee Paid
--------------------	----------------	----------

3/29/2023	2022	\$968.96
3/28/2024	2023	\$951.37

B. Annual Emissions Inventory [40 CFR § 71.9(h)(l) 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.

OBSERVATION: Annual emissions reports received by EPA for the Island Compressor Station are displayed in Table 14, below. Reports were submitted on or before April 1st of the relevant calendar year.

Table 14: Annual Emissions Reported for the Island Compressor Station

Pollutant	Actual Emissions (tpy)	
	2022	2023
NO _x	9.3	6.3
VOC	5.5	5.2
SO ₂	0.0	0.1
PM ₁₀	0.0	1.2
Total HAPs^a	1.2	2.1

^a HAPs reported were also included in VOC emissions, so were not counted again when calculating the total emissions.

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

3. Compliance Certifications [40 CFR § 71.6(c)(5)]
 - (a) The Permittee shall submit to the EPA a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices annually by January 31st, and shall cover the same 12-month period as the two consecutive semi-annual monitoring reports.

OBSERVATION: Title V Annual Compliance Certifications (TVACCs) submitted since the previous inspection are shown in Table 15.

Table 15: Facility-Wide Annual Compliance Certifications (TVACCs)

Reporting Period	Report Date	Notes*
1/1/2022 – 12/31/2022	1/26/2023	Wexpro reported continuous compliance with no deviations.
1/1/2023 – 12/31/2023	1/25/2024	Wexpro reported continuous compliance with no deviations.

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

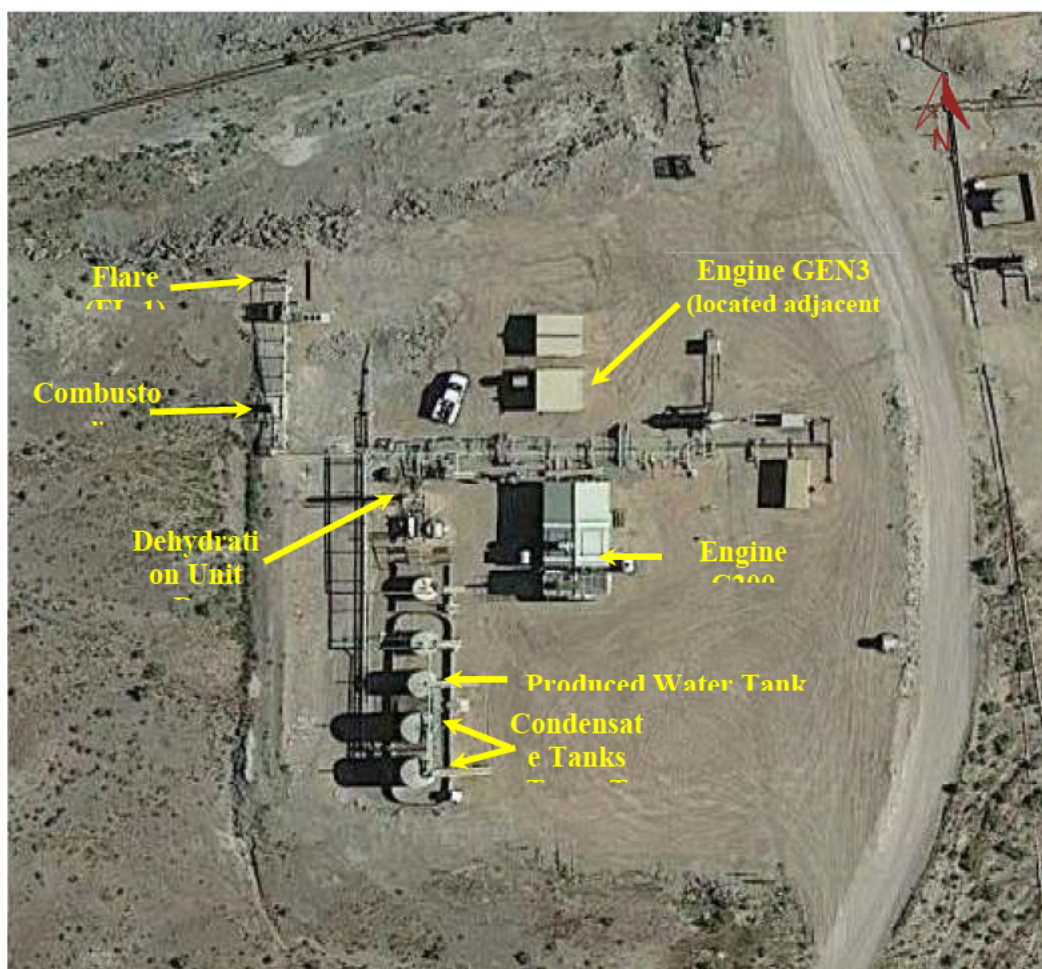
1. The Permittee may request the use of minor permit modification procedures only for those modifications that:
 - (a) Do not violate any applicable requirement;
 - (b) Do not involve significant changes to existing monitoring, reporting, or recordkeeping

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: On July 27, 2021, Wexpro notified the EPA with a request for minor permit modification of the Title V permit, permit # V-UO-000011-2018.00. Wexpro replaced the existing 1,480-horsepower Waukesha natural gas-fired compressor engine (C100) with a unit that has the same make, model and horsepower as the existing one and was manufactured July 2021. The existing C100 unit was due for an overhaul which prompted replacement of the engine. The EPA determined that this change was acceptable and is in the process of updating the permit requirements as necessary which will be reissued in the future as a minor permit modification. The requirements for the new engine, C200, will include NSPS JJJJ requirements for spark ignition engines with maximum engine power greater than 500 hp and was constructed after June 12, 2006 and manufactured after July 1, 2008 as discussed in Section II above. The engine will also comply with the applicable consent decree requirements as discussed in Section V.D above.

APPENDIX A: Site Overview



APPENDIX B: Photo Log

File Name	Description	Photographer
MOV_3586	Rod packing emissions	[REDACTED]
MOV_3587	Glycol flash tank venting emissions	[REDACTED]
MOV_3588	Blowdown pipe emissions	[REDACTED]

APPENDIX C: Consent Decree Termination

Case 2:08-cv-00167-TS Document 498 Filed 06/04/14 Page 1 of 1

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

UNITED STATES OF AMERICA,

Plaintiff,

FRANCES M. POOWEGUP, IRENE C.
CUCH AND PHILLIP CHIMBURAS,
Plaintiff-Intervenor,

v.

QEP FIELD SERVICES, f/k/a QUESTAR
GAS MANAGEMENT COMPANY

Defendant.

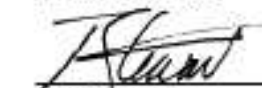
Case No. 2:08-CV-167 TS
District Judge Ted Stewart

ORDER

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

ENTERED this 4th day of June, 2014.

BY THE COURT:



Ted Stewart
United States District Judge