

Operated by MPLX¹ – Wonsits Valley Compressor Station
Full Compliance Evaluation (FCE)
On-Site Inspection

Inspection Date:	June 23, 2022	
Inspection Report Date:	August 22, 2022	
EPA Representatives:	Colin Schwartz, Environmental Scientist, US EPA Region 8 Michael Stovern, Environmental Scientist, US EPA Region 8	
Tribal Representatives:	Marie Johnson	
Company Representatives:	Jessica O'Brien Megan Horrocks Mike Trogstad Stan Harrison Josh Hirschi Jaden Gilroy	
Inspection Report Prepared By:	Colin Schwartz, Physical Scientist, US EPA Region 8	
Inspection Report Reviewed By:	Scott Patefield, Manager, Enforcement and Compliance Assurance Division, Air and Toxics Enforcement Branch	
Last Inspection:	March 12, 2019	SCOTT PATEFIELD Digitally signed by SCOTT PATEFIELD Date: 2022.08.22 15:05:45 -06'00'
Operating Status:	Operating	
Applicable Requirements:	Title V 40 CFR Part 60, Subpart JJJJ: Standards of Performance for New Stationary Sources (NSPS JJJJ) 40 CFR Part 63, Subpart ZZZZ: National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (MACT ZZZZ) 40 CFR Part 63, Subpart HH: National Emissions Standards for Hazardous Pollutants from Oil and Natural Gas Production Facilities (MACT HH) Consent Decree Case No. 2:08-CV-00167-TS-PMW	

Permit Number: V-UO-000005-2018.01
Replaces Permit No.: V-UO-000005-2018.00

Issue Date: November 22, 2021
Effective Date: November 22, 2021
Expiration Date: September 16, 2025

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

Facility Information and Emission Unit Identification

Parent Company Name: MPLX
Mailing Address: 1801 California Street, Suite 1200, Denver, Colorado 80202
Facility Contact: Jessica O'Brien, Environmental Manager
(409) 454-3777
Facility Operator & Name: MPLX, LP – Wonsits Valley Compressor Station (Wonsits)
Facility Location: Latitude 40.140792, Longitude -109.494322
County, State: Uintah, Utah
Reservation: Uintah and Ouray Indian Reservation
Tribe: Ute Indian Tribe
Responsible Official: Michael Gebhardt, Vice President, Mid-Continent Gathering and Processing
SIC Code: 1311 – Crude Petroleum and Natural Gas
AFS ID: 49-047-00103
Other CAA Permits: There are no other CAA permits for this facility.

Enforcement History

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

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

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

40 C.F.R. §§ 60.4244(c) and 60.8(f) because the test was concluded after the first test run.

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

Inspection Findings/Areas of Concern

The post-catalyst temperature of C207 was noted to be higher than the catalyst inlet. MPLX should review or check the thermocouples because the post-catalytic temperature should be lower than the inlet.

The flare, FL-1, controlling emissions from the dehydration unit will have the auto flare-shut-off temperature reduced from 300 degrees F to 150 degrees F. MPLX representatives noted during the onsite inspection that this was due to wind or cold weather events. Because the thermocouple measures both the pilot and combustion zone temperature, EPA would like to for MPLX to exhaust other alternatives before reducing the shut-off temperature by half. Options for MPLX to consider to ensure proper flare operating during adverse weather events include but are not limited to: adjustment of flare air assist speed, pilot gas volume, the addition of a wind screen, reducing the temperature at a smaller increment, or a combination of these options.

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 Arkoma upon finalization.

Description of Operations²

A comingled gas/liquid stream (containing natural gas, condensate, and produced water) flows from the field via two 16-inch pipelines to a slug catcher at the station where the liquids and gas are separated. The liquids gravity-feed to a 3-phase separator that separates produced water, condensate, and gas. The produced water is fed into a pipeline leaving the site. Produced water is temporarily stored in a storage tank (unit T-1, controlled with combustor unit C-1) and is then gravity-fed off site to the Battery 4 facility. The gas continues to one of the inlet scrubbers at 100 psig at near ambient temperature. The gas continues through a 24-inch line where it enters the compressors (powered by engine units C202, C203, C204, C206, or C207). The gas is compressed and discharged at up to 1,200 psig and 120°F. After compression, the gas can flow through a discharge cooler during hot weather to cool it to 120°F or bypass the cooler in colder weather. From the cooler, the gas flows through the dehydrator (unit D-1) inlet coalescer filter to remove the lube oil from the gas. The gas then enters the dehydrator absorber (contactor) and bubbles up through lean triethylene glycol (TEG) to remove water from the gas stream to a concentration determined by a sales contract. The dry gas then enters the downstream coalescer to catch any TEG carryover. The pipeline quality natural gas exits the contactor, is metered, and is routed off location through a 12-inch pipeline to Stagecoach/ Ironhorse Complex Gas Plant. Condensate re-enters the natural gas pipeline to be separated further at Ironhorse Complex Gas Plant. Fuel gas for the station is pulled from the discharge after the dehydrator where it is filtered and separated. The dry fuel gas is then pushed through the individual coalescer filters at each engine.

The rich TEG exits the contactor and is regenerated using heat in a vessel known as a reboiler (R-1). A natural gas-fired heater heats the TEG to a set temperature that boils the impurities out of the TEG. The vapors from the reboiler are routed to the BTEX condenser to remove liquids that drain into the distillate tank. Overhead vapors from the BTEX condenser and flash gas from the flash tank are sent to an emission control device (open flare, unit FL-1). The regenerated lean TEG is circulated back through to the contactor.

² The description of operations provided here is a modified excerpt from the process description provided by MPLX in its November 22, 2021 Title V permit V-UO-000005-2018.01.

General Inspection Observations and Commentary

On June 23, 2022 at 8:10 AM, EPA representatives Colin Schwartz and Michael Stovern and Ute Tribe Air Program representatives Marie Johnson met with MPLX representatives Jessica O'Brien, Megan Horrocks, Mike Trogstad, Stan Harrison, and Josh Hirshi at the MPLX office in Vernal, Utah. An opening conference was conducted, during which EPA inspectors presented credentials. A safety orientation was also completed, and EPA inspectors informed MPLX representatives that the site would be surveyed using a forward looking infrared (FLIR) camera, 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 but a Sampling Form was completed. Mr. Schwartz informed MPLX representatives about the information that will be requested to review post inspection to ensure compliance with permit requirements. EPA, MPLX, and tribal representatives departed the Vernal office at 8:35 AM.

EPA, MPLX, and tribal representatives arrived at the Wonsits Valley Compressor Station at 9:45 AM. MPLX representative Jaden Gilroy joined the group on site. A job safety analysis (JSA) was conducted prior to touring the facility.

According to information provided by MPLX during the inspection, Wonsits Valley currently has an inlet pressure of approximately 93 psi and discharges natural gas at approximately 950 psi. Processed gas goes to the pipeline and condensate is piped (gravity-fed) to Battery 4. The produced water and lube oil from compression is routed to the slop tank, additionally, condensate stored onsite prior to discharge to Ironhorse are all controlled by a combustor. Mr. Schwartz and MPLX representatives, Ms. O'Brien, Mr. Trogstad and Mr. Gilroy, reviewed the dehydration unit and witnessed the Wheatley P200 recirculation pump (serial # 26580) for the dehydration unit operating at approximately 10-10.5 gal/min. Mr. Schwartz and Mr. Stovern attempted to count the strokes and approximated 180 strokes per minute from the recirculation pump in operation. Mr. Trogstad informed Mr. Schwartz that if the control device, flare FL-1, was not operating the dehydration unit would automatically shut in. The flares operating parameters were reviewed and Mr. Trogstad noted that the current flare shut-off temperature of based on pilot/combustion zone (thermocouple is located on the pilot which is enveloped by the combustion of vapors when emissions are routed to the flare) is 300 degrees F but will soon lower this threshold to 150 degrees F to account for times when wind is blowing over the thermocouple of the flare. FL-1 is a low pressure, air assist flare according to MPLX representatives.

All engines, besides C202, were operating at the time of inspection. Mr. Schwartz verified serial numbers of all engines which matched the serial numbers in the Title V permit. During follow-up Mr. Hirschi confirmed that C202 had just had the rod-packing replaced on June 22, 2022, and the gas compression capabilities from the other engines allowed for C202 to stay off during our onsite inspection. See Table 1 below for the catalyst pre and post operating temperatures, percent load on the engines, pressure drop, and baseline pressure which were all recorded during the inspection. The post-catalyst temperature of C207 was noted to be higher than the catalyst inlet. MPLX should consider reviewing or checking the thermocouples because the post-catalytic temperature should be lower than the inlet.

Table 1: Engine Parameters Recorded During Inspection

Unit ID	Load (%)	Catalyst Inlet Temperature (°F)	Post-Catalyst Temperature (°F)	Pressure Drop (inches of water)	Pressure Baseline (inches of water)
C202	Not operating at time of inspection.				
C203	84	695	693	6.9	6.9
C204	89	663	657	6.5	6.4
C206	71	663	659	7.5	7.9
C207 ^a	89	768 (East)	767 (East)	1.8 (East)	2.1 (East)
		673 (West)	678 (West)	1.2 (West)	1.4 (West)

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

Details of the video taken during the inspection are found in Appendix B. Visible emissions were observed while EPA inspectors were on site from a compression stage connector piece near a compressor associated with C207. According to Ms. Horrock, this leak has been identified by MPLX. First repair was unsuccessful and Wonsits Valley is on a delay of repair. MPLX representatives informed Mr. Schwartz that this should be repaired during planned maintenance and shutdown of C207 in August 2022.

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 claimed. During the on-site conference, Mr. Schwartz discussed the leaks discovered by Mr. Stovern onsite, and that Mr. Schwartz will be requesting information regarding the cost of replacement parts for engine C207. EPA and tribal staff departed the facility at 11:30 AM. An email to request relevant compliance-related information and records was sent to Ms. O'Brien on July 5, 2022. Mr. Hirschi provided the requested information to EPA via email on July 18, 2022.

Potential to Emit (PTE)

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

While the potential to emit for hazardous air pollutants (HAPs), including formaldehyde (CH₂O), is below “major” source thresholds of 10 ton per year (tpy) for a single HAP or 25 tpy for any combination of HAP, the Wonsits Valley Compressor Station is a major source of HAP based on the requirements of Paragraph 158 and Paragraph 169 of federal consent decree Case No. 2:08-CV-00167-TS (see excerpts below).

Paragraph 158: The Wonsits Valley facility is a “major source” of HAP emission within the meaning of Section 112(a)(1) of the Act, 42 U.S.C. § 7412(a)(1), and 40 C.F.R. § 63.761 (definition of “major source”). It became a major HAP source in or around July 2001 upon the startup of the 100 MMscfd TEG dehydrator.

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

See Table 2, below, for facility-wide and emission unit-specific PTE data included in the Statement of Basis for Permit No. V-UO-000005-2018.00 for the Wonsits Valley Compressor Station. The PTE totals below include reductions from legally and practically enforceable requirements set forth in the Title V permit, including a federal Consent Decree (See Section V, below).

Table 23: Potential to Emit in Tons Per Year (tpy)**MPLX Wonsits Valley Compressor Station****Table 2 – Potential-to-Emit Without Legally and Practicably Enforceable Controls**

Regulated Air Pollutants (tpy)											
	NO_x*	CO*	VOC*	PM*	SO₂*	CH₂O*	Total HAPs*	CO₂*	CH₄* (as CO₂e)	N₂O* (as CO₂e)	CO₂e*
C202	32.89	82.22	35.72	1.12	0.07	8.55	10.59	13,139	6.20	7.39	13,153
C203	32.89	82.22	35.72	1.12	0.07	8.55	10.59	13,139	6.20	7.39	13,152
C204	32.89	82.22	35.72	1.12	0.07	8.55	10.59	13,139	6.20	7.39	13,152
C206	38.91	65.85	21.91	1.00	0.06	5.29	7.11	11,713	5.52	65.83	11,784
C207	43.97	109.94	46.87	1.50	0.09	11.43	14.16	17,498	8.25	19.83	17,516
D-1	-	-	393.23	-	-	-	213.43	-	-	-	-
R-1	0.39	0.33	0.02	0.03	0.00	-	0.01	511.97	0.24	0.29	513
T-1	-	-	13.12	-	-	-	0.55	-	-	-	-
T-2 – T-9	-	-	1.12	-	-	-	0.07	-	-	-	-
EL	-	-	4.79	-	-	-	0.38	-	-	-	-
FL-1	0.02	0.02	0.00	0.00	0.00	-	-	-	-	-	-
C-1	0.01	0.005	-	-	-	-	-	-	-	-	-
C-2	0.05	0.03	0.00	0.00	0.00	-	0.00	-	-	-	-
LO	-	-	1.57	-	-	-	-	-	-	-	-
ES	-	-	0.22	-	-	-	0.01	-	-	-	-
CB	-	-	10.05	-	-	-	0.49	-	-	-	-
ESD	-	-	0.067	-	-	-	0.003	-	-	-	-
PG	-	-	10.17	-	-	-	0.01	-	-	-	-
TOTAL	182.02	422.84	610.30	5.89	0.36	42.37	267.99	69,139.97	32.61	108.12	69,270

*NO_x = nitrogen oxide; CO = carbon monoxide; VOC = volatile organic compound; PM = particulate matter; SO₂ = sulfur dioxide; CH₂O = formaldehyde; HAP = hazardous air pollutant; CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; CO₂e = equivalent CO₂.

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

Regulated Air Pollutants (tpy)											
	NO_x	CO	VOC	PM	SO₂	CH₂O	Total HAPs	CO₂	CH₄ (as CO₂e)	N₂O (as CO₂e)	CO₂e
C202	32.9	32.9	17.9 ^a	1.1	0.1	1.64	2.7	13,139	6.20	7.39	13,153
C203	32.9	32.9	17.9 ^a	1.1	0.1	1.64	2.7	13,139	6.20	7.39	13,153
C204	32.9	32.9	17.9 ^a	1.1	0.1	1.64	2.7	13,139	6.20	7.39	13,153
C206	38.9	29.9	11.0 ^a	1.0	0.1	2.69	3.6	11,713	5.52	65.83	11,784
C207	44.0	44.0	23.4 ^b	1.5	0.1	2.20	3.6	17,498	8.25	9.83	17,516
D-1	-	-	15.3 ^c	-	-	-	6.12	-	-	-	-

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

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

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

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

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

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

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

A. Facility Emission Points

Table 4 - Emission Units and Emission Generator Activities

Unit I.D.	Description	Control Equipment
C202	Caterpillar G3612LE Compressor Engine; 3,406 hp*, 4SLB* RICE*, Natural Gas-Fired Serial No. 1YG00023 Installed: 9/2007 Manufactured: 10/21/2001 Reconstructed: 9/2007	Selective Catalytic Oxidation
C203	Serial No. 1YG00022 Installed: 9/2007 Manufactured: 10/10/1991 Reconstructed: 9/2007	
C204	Serial No. 1YG00034 Installed: 9/2007 Manufactured: 5/12/1993 Reconstructed: 9/2007	
C206	Waukesha 12V-AT27GL Compressor Engine; 3,100 hp, 4SLB RICE, Natural Gas-Fired Serial No. C-13271/2 Installed: 3/2001 Manufactured: 12/7/2000 Reconstructed: 6/2007	Selective Catalytic Oxidation
C207	Caterpillar G3616LE Compressor Engine; 4,554 hp, 4SLB RICE, Natural Gas-Fired Serial No. BLB00215 Installed: 6/2008 Manufactured: 12/5/1993 Reconstructed: 1/2014	Selective Catalytic Oxidation
D-1	100 MMscfd* Triethylene Glycol Dehydrator	Flare (FL-1) Combustor (C-2)
R-1	1.0 MMBtu* Glycol Reboiler	None (IEU)
T-1	500 bbl* Slop Tank, referred to as the Condensate Tank in the Consent Decree No. 2:08-CV-00167-TS-PMV 21,900 bbls per year Annual Condensate Throughput	Combustor (C-1) (IEU)
T-2 T-3 T-4 T-5 T-6 T-7 T-8 T-9	Miscellaneous Chemical Storage Tanks 100 bbl New Glycol 100 bbl New Lube Oil 100 bbl Used Lube Oil 100 bbl Used Glycol 65 bbl Glycol 100 bbl Produced Water 100 bbl Dehydrator Drip Tank 100 bbl Dehydrator Drip Tank	None (IEU)
EL	Fugitive Equipment Leaks	None
PG	Pigging Operations	None (IEU)
ES	Engine Start-ups	None (insignificant emission unit)
CB	Compressor Blowdowns	None

Unit I.D.	Description	Control Equipment
ESD	Emergency Shutdowns	None (IEU)
FL-1	Elevated Open-Flame Flare	Dehydrator (D-1) (IEU)
C-1	Cimarron 30" Standard Tank Vapor ECD*	Slop Tank (T-1) (IEU)

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

Table 5: Requirements for Emission Units

Equipment	Applicable Requirements	Limitations	Monitoring	
			Method	Interval
C202, C203, C204 (3) 3406 hp Caterpillar 3612LE	MACT ZZZZ	Oxidation catalyst reducing CO emissions by 93% or more	Performance test CPMS ^a : Catalyst Inlet Temp. and ΔP	Semi-Annual ^b Continuous
	NSPS JJJJ	NO _x = 2.0 g/hp-hr CO = 4.0 g/hp-hr VOC = 1.0 g/hp-hr	Performance test	Every three years or 8,760 hours of operations
	Consent Decree (CD)	NO _x = 1.0 g/hp-hr CO = 1.0 g/hp-hr	Performance test	Semi-Annual
C207 (1) 4554 hp Caterpillar 3616LE	MACT ZZZZ	Oxidation catalyst reducing CO emissions by 93% or more	Performance test CPMS ^a : Catalyst Inlet Temp. and ΔP	Semi-Annual ^b Continuous
	NSPS JJJJ	NO _x = 1.0 g/hp-hr CO = 2.0 g/hp-hr VOC = 0.7 g/hp-hr	Performance test	Every three years or 8,760 hours of operations
	Consent Decree (CD)	NO _x = 1.0 g/hp-hr CO = 1.0 g/hp-hr	Performance test	Semi-Annual
D-1 100 MMscfd Glycol Dehydrator	MACT HH Consent Decree (CD)	Control device reducing VOC emissions by 95% or more	Presence of pilot light No visible emissions	Continuous
R-1 10 MMBtu Glycol Reboiler	MACT HH	Reduce mass content of TOC or HAP by 95.0% by weight or greater OR Operate at a minimum temperature of 760°C Vent stream shall be introduced into the flame zone	Temperature	Continuous
T-1 500 bbl Condensate Tank	Consent Decree (CD)	Control device reducing VOC emissions by 95% or more	Presence of pilot light No visible emissions	Continuous

^a CPMS = Continuous Parametric Monitoring System

^b If the results of two consecutive semi-annual tests demonstrate compliance, the frequency of testing may be reduced to annual.

OBSERVATION: Mr. Schwartz confirmed each engine nameplate for matching make, model, and serial number information from the nameplates matched the information listed in the permit.

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

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

1. 40 CFR part 60, subpart JJJJ applies to the following emission units:
 - (a) Caterpillar G3612LE engine identified as C202 in Table 2 of this permit;
 - (b) Caterpillar G3612LE engine identified as C203 in Table 2 of this permit;
 - (c) Caterpillar G3612LE engine identified as C204 in Table 2 of this permit;
 - (d) Waukesha 12V-AT27GL engine identified as C206 in Table 2 of this permit; and
 - (e) Caterpillar G3616LE engine identified as C207 in Table 2 of this permit.
2. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR part 60, subpart JJJJ (Subpart JJJJ).

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

B. General Provisions [40 CFR 60.4246]

1. The Facility is subject to the requirements of 40 CFR part 60, subpart A – General Provisions as specified in Table 3 of Subpart JJJJ. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR part 60, subpart A.
2. All reports required under 40 CFR part 60, subpart A shall be sent to the EPA at the following address as listed in § 60.19:

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

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

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

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

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

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

Engines C202, C203, C204, and C206 (manufacture date on or after July 1, 2007)

**NO_x = 2.0 g/hp-hr
CO = 4.0 g/hp-hr
VOC = 1.0 g/hp-hr**

Engine C207 (manufacture date on or after July 1, 2010)

**NO_x = 1.0 g/hp-hr
CO = 2.0 g/hp-hr
VOC = 0.7 g/hp-hr**

Performance tests results since the last inspection appear to indicate compliance with the NSPS JJJJ emission standards. (See Table 6, p. 13)

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

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

1. Purchasing an engine certified according to the procedures specified in Subpart JJJJ for the same model year and demonstrating compliance according to one of the methods specified in paragraphs 1. (a) or (b) of this section:
 - (a) If the Permittee operates and maintains the certified stationary SI ICE and control device according to the manufacture's emission-related written instructions, the Permittee shall keep records of conducted maintenance to demonstrate compliance, but no performance testing is required. The Permittee shall also meet requirements as specified in 40 CFR 1068 subparts A through D, as applicable. If the Permittee adjusts engine settings according to and consistent with the manufacturer's instructions, the stationary SI ICE will not be considered out of compliance; or
 - (b) If the Permittee does not operate and maintain the certified stationary SI ICE and control device according to the manufactures emission-related written instructions, the engine will be considered a non-certified engine and the Permittee shall demonstrate compliance according to §§ 60.4243(a)(2)(i) through(iii) as appropriate; or
2. Purchasing a non-certified engine and demonstrating compliance with the emission standards specified in Section II.C. of this permit and according to the test methods and other procedures specified in § 60.4244, and according to the following:

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

performance testing every 8,760 hours or for 3 years, whichever comes first, to demonstrate compliance.

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

OBSERVATION: Pursuant to §60.4243(b)(2)(ii), MPLX is required to keep a maintenance plan and records of conducted maintenance on C202, C203, C204, C206, and C207, and to operate the engines in a manner consistent with good air pollution control practices. MPLX provided maintenance records for C202, C203, C204, C206, and C207 to EPA upon request. Documents indicate that maintenance is scheduled to be conducted at regularly scheduled intervals of 720 hours for visual inspections of all engines and service 2,500 hours for C202, C203, C204 and C207, with 2,000 hours for C207 services. An initial performance test must be conducted on each engine, with subsequent testing every 8,760 hours or three years, whichever comes first. See Table 6, p. 13 for NSPS JJJJ performance tests conducted at the Wonsits Valley Compressor Station from 2019 to present.

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

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

OBSERVATION: Pursuant to §60.4243(c) and (b)(2)(ii), engines C202, C203, C204, C206, and C207 must conduct performance tests every 8,760 hours of operation or 3 years, whichever comes first. Results of NSPS JJJJ performance tests are displayed in Table 6, p. 14.

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

Tests on all engines appear to have been conducted in accordance with the test methods required by NSPS Subpart JJJJ (40 CFR §60.4244), that is to conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first, thereafter to demonstrate compliance. The tests all appeared to follow three 1-hour test runs as specified in NSPS JJJJ.

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

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

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

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

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

Emission Unit ID	S/N	Test Date(s)	Avg. NO _x (g/hp-hr)	NO _x Limit* (g/hp-hr)	Avg. CO (g/hp-hr)	CO Limit* (g/hp-hr)	Avg. VOC (g/hp-hr)	VOC Limit (g/hp-hr)	Avg. Load	Engine Run Time (hrs)
C202	1YG00023	5/30/2019	0.661	2.0	0.026	4.0	0.326	1.0	85%	n.r.
C202	1YG00023	5/13/2020	0.548	2.0	0.001	4.0	0.081	1.0	81%	n.r.
C202	1YG00023	5/10/2021	0.55	2.0	0.00	4.0	0.00	1.0	84.3%	88895
C203	1YG00022	5/22/2019	0.875	2.0	0.0378	4.0	0.615	1.0	84%	n.r.
C203	1YG00022	5/13/2020	0.544	2.0	0.003	4.0	0.076	1.0	82%	n.r.
C203	1YG00022	5/11/2021	0.51	2.0	0.00	4.0	0.00	1.0	86.3%	119451
C204	1YG00034	5/22/2019	0.604	2.0	0.0534	4.0	0.709	1.0	88%	n.r.
C204	1YG00034	5/14/2020	0.688	2.0	0.014	4.0	0.078	1.0	81%	n.r.
C204	1YG00034	5/11/2021	0.65	2.0	0.00	4.0	0.00	1.0	80%	90262
C206	C-13271/2	5/30/2019	0.447	2.0	0.123	4.0	0.739	1.0	95%	n.r.
C206	C-13271/2	5/14/2020	0.659	2.0	0.075	4.0	0.077	1.0	83%	n.r.
C206		5/10-5/14								
C206	C-13271/2	8/16/2021	0.43	2.0	0.12	4.0	0.00	1.0	83%	8339
C207	BLB00215	5/21/2019	0.66	1.0	0.046	2.0	0.464	0.7	95%	n.r.
C207	BLB00215	5/12/2020	0.73	1.0	0.03	2.0	0.1	0.7	96%	n.r.
C207	BLB00215	5/12/2021	0.57	1.0	0.03	2.0	0.00	0.7	88%	94576

Note: Consent Decree/Permit limits for NO_x and CO are more stringent than NSPS JJJJ limits.

n.r = Not Reported

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

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

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

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

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

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

B. General Standards [40 CFR 63.764]

1. The General Provisions at 40 CFR part 63, subpart A apply as specified in Table 2 of 40 CFR part 63, subpart HH. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR part 63, subpart A.
2. All reports required under 40 CFR part 63, subpart A shall be sent to the EPA at the following address as listed in § 63.13:

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

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

3. The Permittee shall comply with the following requirements for the large glycol dehydrator at a major source as specified in § 63.764(c):
 - (a) The control requirements for glycol dehydrator process vents specified in § 63.765;
 - (b) The monitoring requirements specified in § 63.773; and
 - (c) The recordkeeping and reporting requirements specified in §§ 63.774 and 63.775.
4. At all times, the Permittee shall operate and maintain any glycol dehydration unit, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the EPA which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records and inspection of the unit.

OBSERVATION: The glycol dehydrator (D-1) at Wonsits Valley is controlled by a flare (F-1). Control device downtime is reported by MPLX in its Semi-Annual Periodic MACT HH Reports. (See Table 7, p. 18, for details.). Additional records review included dehydration unit pump operations, flare and combustor operations (prior to combustor C-2's removal).

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

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

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

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

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

According to previous inspection reports, flash gas from the dehydration unit is routed back into the process and used as fuel for the reboiler. Any flash gas from the dehydration unit that cannot be used by the reboiler burner is routed to a John Zink air-assisted flare with a manufacturer's guarantee of 98% hydrocarbon emission reduction, however MPLX may only use 95% as their enforceable limit through MACT HH. Per 40 CFR §63.771(d)(1)(iii), the flare must be designed and operated in accordance with the requirements of 40 CFR §63.11(b). The presence of a pilot light in the flare is continuously monitored via thermocouple. The flares operating parameters were reviewed while onsite and during records review. While onsite, Mr. Trogstad noted that the current flare shut-off temperature of based on pilot/combustion zone (thermocouple is located on the pilot which is enveloped by the combustion of vapors when emissions are routed to the flare) is 300 degrees F but will soon lower this threshold to 150 degrees F to account for times when wind is blowing over the thermocouple of the flare. No visible emissions from the flare were observed during the inspection. Pursuant to 40 CFR §§63.771(e)(1)(i) and (e)(2), no performance test on the flare is required. Records for §63.11(b) were reviewed and MPLX included sufficient information, btu content and flare tip velocity, to determine compliance.

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

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

1. For each cover, the Permittee shall comply with the cover requirements specified in § 63.771(b).
2. The Permittee shall comply with the closed-vent system requirements specified in § 63.771(c).

OBSERVATION: No leaks were detected from the closed vent system from Mr. Stovern during his FLIR survey.

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

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

A stack test had not been completed prior to C-2's removal from the site between the 2019 inspection and 2022 inspection. EPA had previously informed MPLX that C-2 was subject to MACT HH and therefore was required to conduct a stack test as specified in § 63.771(d). After ongoing discussions MPLX decided to remove C-2.

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

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

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

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

A stack test was not completed prior to C-2's removal from the site between the 2019 inspection and 2022 inspection.

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

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

OBSERVATION: The inspection and monitoring requirements specified in §63.773(c) require an initial inspection to demonstrate that the closed-vent system operates with no detectable emissions. The initial inspection was conducted more than five years ago and so is not applicable to this compliance evaluation. Annual visual inspections for defects of the closed-vent and cover and annual Method 21 inspections on the closed-vent system are also required. Results of annual inspections were submitted with the MACT HH Semi-Annual Periodic Reports since the previous inspection are shown in Table 7 below. The Method 21 inspections took place on 4/2/19, 4/8/20, 4/21/21.

MPLX representatives utilize a SCADA system to comply with additional monitoring parameters of the control device. Mr. Hirschi provided combustor C-2 and flare FL-1 data to compare to operating hours of the dehydration unit. MPLX also maintains a system that records if the dehydration unit was operating without controls. On June 22, 2022 MPLX noted that for approximately 30 minutes the flare was not operating and the dehydration unit was running. Upon further investigation, MPLX relayed to the EPA that it was determined that there was a stuck contact on the pump which gave a false positive signal showing that it was on, when it wasn't on. Therefore, it appears that emissions were not routed

directly to the atmosphere during this event and the dehydration unit was shut-in correctly.

40 CFR § 63.773(d)(1)(iii) requires a CPMS performance evaluation at least once every 12 months. In an email on 8/10/2022, Mr. Hirschi provided Mr. Schwartz information indicating that CPMS performance evaluations was conducted on October 16, 2020, October 18, 2021 and another is planned for October 17, 2022.

G. Recordkeeping Requirements [40 CFR 63.774]

1. The recordkeeping provisions of 40 CFR part 63, subpart A, that apply and those that do not apply to the Permittee are listed in Table 2 of 40 CFR part 63, subpart HH.
2. The Permittee shall maintain the records specified in §§ 63.774(b), (c), (e) and (g).
3. Except as specified in § 63.774(c), the Permittee shall maintain the records specified in § 63.774(b).
4. If compliance with the benzene emission limit specified in § 63.765(b)(1)(ii) is elected, the Permittee shall document, to the Administrator's satisfaction, the items in § 63.774(c).
5. The Permittee shall keep records of the requirements of § 63.774(e) when using a flare to comply with § 63.771(d).
6. The Permittee shall maintain records, pursuant to § 63.774(g), of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control equipment and monitoring equipment. The Permittee shall maintain records of actions taken during periods of malfunction to minimize emissions in accordance with § 63.764(j), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

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

H. Reporting Requirements [40 CFR 63.775]

1. The reporting provisions of subpart A of this part, that apply and those that do not apply to the Permittee are listed in Table 2 of this subpart.
3. The Permittee shall submit the information specified in § 63.775(b).
3. The Permittee shall submit Notification of Compliance Status Reports as specified in § 63.775(d).
4. The Permittee shall submit Periodic Reports as specified in § 63.775(e).
5. The Permittee shall submit notifications of process changes as specified in § 63.775(f).

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

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

The following MACT HH periodic monitoring reports covering the reporting periods from January 1, 2019 – December 31, 2021 have been submitted by MPLX for the Wonsits Valley Compressor Station.

Table 7: Wonsits Valley Compressor Station MACT HH Reports

Reporting Period	Report Date	Date Report Received	Comments
January 1 – June 30, 2019	7/30/19	7/31/19	- Reported 174.0 hrs excess emissions (flare down and combustor online; dehy running) – 4.0% of operating time. - Reported 183.0 hrs of flare downtime (9.0 with facility down, 174.0 with facility up and backup on) - Annual Method 21 and visual inspection of cover and CVS conducted 4/2/2019. Reported no leaks or defects found. - Reported 1.0 hrs CPMS downtime while facility up.
July 1 – December 31, 2019	1/30/20	2/5/20	- Reported 101.0 hours of excess emissions (flare down, backup combustor on, dehy running) – 2.35% of operating time. Also reported 4.4 hours of flare downtime with no backup combustor and dehy running. - Reported 189 hrs of flare downtime (101 with facility operating and 88 with facility down) - Reported 1 hr of CPMS downtime.
January 1 – June 30, 2020	7/30/20	7/30/20	- Reported 8.0 hours of excess emissions (flare down) – 4 of those hours with the facility operating and the combustor on; the other 4 hrs with the facility down - No CPMS downtime reported. - Total dehy runtime in reporting period = 4,347.6 hrs - Annual Method 21 and visual inspection of cover and CVS conducted 4/8/2020. Reported no leaks or defects found.
July 1 – December 31, 2020	1/26/21	1/26/21	- Reported 0.02 hours of excess emissions (flare down and dehy operating) – linked to station ESD. - Reported 1.0 hrs of CPMS downtime. - Total dehy runtime in reporting period = 4370.9 hrs
January 1 – June 30, 2021	7/16/2021	7/16/2021	- Reported no excess emissions during reported period. - Reported 1.0 hrs of CPMS downtime = 0.02% of operating time. - Reported changes in processes or controls: “Flare pilot outage triggers immediate TEG pump shutdown.” - Total dehy runtime in reporting period = 4323.2 hrs - Reported 9.75 hrs of flare downtime – all with dehy off. - Annual Method 21 and visual inspection of cover and CVS conducted 4/21/2021. Reported no leaks or defects found.
7/1/2021 – 12/31/2021	1/31/2022	1/31/2022	Reported no excess emissions during reporting period.

			• Reported 0.18 hrs of CPMS downtime = 0.004% of operating time. • Reported changes in processes or controls: “Flare pilot outage triggers immediate TEG pump shutdown.” • Total dehy runtime in reporting period = 4374.8 hrs
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IV. National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines - 40 CFR Part 63, Subpart ZZZZ

A. Applicability [40 CFR 63.6585(a)]

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

1. Caterpillar G3612LE engine identified as C202 in Table 2 of this permit;
2. Caterpillar G3612LE engine identified as C203 in Table 2 of this permit;
3. Caterpillar G3612LE engine identified as C204 in Table 2 of this permit;
4. Waukesha 12V-AT27GL engine identified as C206 in Table 2 of this permit; and
5. Caterpillar G3616LE engine identified as C207 in Table 2 of this permit.

OBSERVATION: Per the federal consent decree (Case No. 2:08-CV-00167-TS-PMV), the Wonsits Valley Compressor Station is a major source of HAP under MACT ZZZZ (see p. 6). Therefore, engines C202, C203, C204, C206, and C207 are considered new (reconstructed after December 19, 2002), 4-stroke lean burn (4SLB), spark ignition (SI), natural gas-fired engines with greater than 500 hp located at a major source of HAP. These engines are subject to emissions limitations in MACT ZZZZ Table 2a (#2) and operating limitations in Table 2b (#1).

B. General Provisions [40 CFR 63.6665]

1. The General Provisions at 40 CFR part 63, subpart A apply as specified in Table 8 of 40 CFR part 63, subpart ZZZZ. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR part 63, subpart A.
2. All reports required under 40 CFR part 63, subpart A shall be sent to the EPA at the following address as listed in § 63.13:

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

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

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

1. The Permittee shall comply with the emissions limitations and operating limitations for stationary 4SLB RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions, specified in § 63.6600(b) for engines C202, C203, C204, C206 and C207.
2. The Permittee shall demonstrate compliance with general requirements for engines C202, C203, C204, C206 and C207 according to § 63.6605.
3. Pursuant to § 63.6600, compliance with the numerical emissions limitations for stationary 4SLB RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions established in 40 CFR part 63, subpart ZZZZ for engines C202, C203, C204, C206 and C207, shall be based on the results of testing the average of three 1-hour runs using the testing requirements and procedures in § 63.6620 and Table 4 to 40 CFR part 63, subpart ZZZZ.

OBSERVATION: Pursuant to 40 C.F.R. §63.6600, engines C202, C203, C204, C206, and C207 must meet the emission limitations established in MACT ZZZZ by either (a) reducing carbon monoxide (CO) emissions by 93% or more or (b) limiting the concentration of formaldehyde (CH₂O) in the exhaust to 14 ppmvd or less at 15% O₂. The engines at the Wonsits Valley Compressor Station comply with MACT ZZZZ using the CO reduction limitation option. In accordance with Table 3 (#1) to MACT ZZZZ, compliance with reduction requirements is determined through semi-annual performance testing. See Table 8, p. 22 for results of MACT ZZZZ performance tests conducted at the Wonsits Valley Compressor Station since the March 12, 2019 inspection.

Engines C202, C203, C204, C206, and C207 meet the continuous monitoring requirements of MACT ZZZZ Table 2b (#1) by (1) operating a continuous parametric monitoring system (CPMS) to ensure the catalyst inlet temperature is greater than or equal to 450°F and less than or equal to 1350°F, and (2) maintaining the pressure drop across the catalyst to within 2 inches of water of the pressure drop recorded during the performance test that established baseline operating parameters (at 100% load ± 10%). Per Table 6 (#1) of MACT ZZZZ, to demonstrate continuous compliance with CPMS requirements, MPLX must collect catalyst temperature, reduce the temperature data to 4-hour rolling averages, and ensure the 4-hour rolling averages are within the operating limitations for catalyst inlet temperature specified above. MPLX must also measure the pressure drop across the catalyst once per month to demonstrate it is within the allowable range established during the performance test. In response to a request from EPA, Mr. Hirschi provided catalyst temperature data and monthly pressure drop readings covering the period of January 1, 2019 through June 30, 2022 for engines C202, C203, C204, C206, and C207. See the observations in Section III.E. for details.

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

D. Testing and Initial Compliance Requirements

[40 CFR 63.6610, 63.6615, 63.6620, 63.6625, and 63.6630]

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

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

2. The Permittee shall conduct subsequent performance tests for stationary 4SLB RICE with a site rating of

more than 500 brake hp located at a major source of HAP emissions, as specified in § 63.6615, for engines C202, C203, C204, C206 and C207.

3. The Permittee shall use the performance tests and other procedures for stationary 4SLB RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions, as specified § 63.6620 for engines C202, C203, C204, C206 and C207.
4. The Permittee shall comply with the monitoring, installation, collection, operation and maintenance requirements for stationary 4SLB RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions, as specified in § 63.6625, for engines C202, C203, C204, C206 and C207.

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

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

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

OBSERVATION: Pursuant to §63.6615, §63.6620 and Table 3 to MACT ZZZZ, semi-annual performance testing must be conducted on engines C202, C203, C204, C206, and C207, with the option of moving to annual testing after two consecutive successful semi-annual tests. MPLX moved to annual testing frequency following successively passing semi-annual performance tests in both 2014 and 2015.

See Table 8, below, for results of all MACT ZZZZ performance testing conducted since January 1, 2019. Pressure drop and catalyst inlet temperature were measured during the testing.

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

Emission Unit ID	S/N	Test Date(s)	Notification Rcvd	Report Rcvd	Avg. CO Destruction Efficiency	CO Destruction Efficiency Requirement	Avg. Load	Catalyst ΔP (inches H ₂ O)
C202	1YG00023	5/30/2019	4/17/2019	7/16/2019	98.7%	93%	85%	6.9
C202	1YG00023	5/13/2020	3/11/2020	7/2/2020	99.95%	93%	81%	6.7
C202	1YG00023	5/10/2021	3/15/2021	6/14/2021	100%	93%	84.3%	7.0
						93%		
C203	1YG00022	5/22/2019	4/17/2019	7/16/2019	98.4%	93%	84%	8.7
C203	1YG00022	5/13/2020	3/11/2020	7/2/2020	99.8%	93%	82%	8.4
C203	1YG00022	5/11/2021	3/15/2021	6/14/2021	99.8%	93%	86.3%	11.5
C204	1YG00034	5/22/2019	4/17/2019	7/16/2019	97.1%	93%	88%	6.4
C204	1YG00034	5/14/2020	3/11/2020	7/2/2020	99.3%	93%	81%	5.6

C204	IYG00034	5/11/2021	3/15/2021	6/14/2021	100%	93%	80%	6.3
C206	C-13271/2	5/30/2019	4/17/2019	7/16/2019	97.4%	93%	95%	9.4
C206	C-13271/2	5/14/2020	3/11/2020	7/2/2020	96.9%	93%	83%	7.6
C206		5/10-5/14	3/15/2021					
C206	C-13271/2	8/16/2021	7/15/2021	9/23/2021	96.2%	93%	83%	7.9
C207	BLB00215	5/21/2019	4/17/2019	7/16/2019	97.7%	93%	95%	1.5 (East/LB) 2.4 (West/RB)
C207	BLB00215	5/12/2020	3/11/2020	7/2/2020	98.4%	93%	96%	2.1 (East/LB) 1.4 (West/RB)
C207	BLB00215	5/12/2021	3/15/2021	6/14/2021	98.3%	93%	88%	3.0 (East) 1.3 (West)

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

1. The Permittee shall monitor and collect data to demonstrate continuous compliance for stationary 4SLB RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions, as specified in § 63.6635, for engines C202, C203, C204, C206 and C207.
2. The Permittee shall demonstrate continuous compliance with the emission limitations, operating limitations, and other requirements for stationary 4SLB RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions, as specified in § 63.6640, for engines C202, C203, C204, C206 and C207.

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

EPA observed the CPMS for engines C203, C204, C206 and C207 during its tour of the facility. (See Table 1, p. 4 for engine parameters recorded during the inspection.) Catalyst inlet temperature and differential pressure across the catalyst appeared to be within the compliant range at the time of inspection. Mr. Hirschi provided inlet catalyst temperature data and monthly pressure drop readings covering the period of January 1, 2019, through June 30, 2022 to EPA for review. EPA notes the rolling average listed temperatures in the compliant range.

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

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

1. The Permittee shall submit notifications as specified for stationary 4SLB RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions in § 63.6645 for engines C202, C203, C204, C206 and C207.
2. The Permittee shall submit reports as specified for stationary 4SLB RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions in § 63.6650 and Table 7 for engines C202, C203, C204, C206 and C207. Reports of required performance tests shall be submitted with the respective semiannual report required in Section VI.B.1. of this permit that corresponds with the reporting period within which the test was conducted.
3. The Permittee shall keep records as specified in § 63.6655 for engines C202, C203, C204, C206 and C207.
4. The Permittee shall keep the records in the format and for the duration as specified in § 63.6660 for engines C202, C203, C204, C206 and C207.

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

As required by 40 CFR §63.6650 and Table 7 to 40 CFR Part 63, Subpart ZZZZ, MPLX submitted the required semi-annual compliance reports for engines C202, C203, C204, C206, and C207. The reports contained details of any deviations from emissions and/or operating limitations and continuous reporting downtimes. See Table 9, p. 24, for details of MACT ZZZZ reports submitted for the Wonsits Valley Compressor Station for the 2019 through present reporting periods.

Table 9: MACT ZZZZ Semi-Annual Compliance Reports (2019 – Present)

Reporting Period	Report Date	Notes
January 1 – June 30, 2019	7/30/19	• No APCD malfunctions or deviations reported. • 1.75 total hrs CPMS downtime reported (catalyst inlet temp C207).
July 1 – December 31, 2019	1/30/20	• No APCD malfunctions or deviations reported. • 3 total hrs of CPMS downtime reported. • 1.5 total hrs of deviations reported due to SCADA data outage. • CPMS performance evaluation conducted 10/17/2019.
January 1 – June 30, 2020	7/30/20	• No APCD malfunctions or deviations reported. • No CPMS out-of-control periods reported. • 7.5 total hrs CPMS downtime reported (catalyst inlet temp. on all engines) • During reporting period: C202 operated for 1,379.03 hrs; C203 for 1,973.46 hrs; C204 for 1,756.61 hrs; C206 for 1,493.29 hrs; C207 for 3,907.92 hrs.
July 1 – December 31, 2020	1/26/21	• No APCD malfunctions or deviations reported. • No CPMS out-of-control periods reported. • 0.5 total hrs CPMS inoperative periods/downtime reported (catalyst inlet temp. missing on C206 and C207) • No deviations reported.

		• CPMS performance evaluation conducted the week of October 12, 2020. • During reporting period: C202 operated for 190.2 hrs; C203 for 368.26 hrs; C204 for 1894.24 hrs; C206 for 2728.65 hrs; C207 for 4084.28 hrs.
January 1 – June 30, 2021	7/16/2021	• No APCD malfunctions reported. • No CPMS out-of-control periods reported. • No CPMS changes reported. • 5.75 total hrs of CPMS inoperative periods/downtime reported (missing catalyst inlet temp. on C202, C203, C204, C206, and C207 on 3/14/2021 and 5/13/2021) • No deviations reported. • During reporting period: C202 operated for 1511.81 hrs; C203 for 2697 hrs; C204 for 3134.68 hrs; C206 for 1163.37 hrs; C207 for 4256.6 hrs.
7/1/2021 – 12/31/2021	1/31/2022	• No APCD malfunctions reported. • No CPMS out-of-control periods reported. • No CPMS changes reported. • 7.0 total hrs of CPMS inoperative periods/downtime reported (bad catalyst inlet temp. data on C207) • No deviations reported. • During reporting period: C202 operated for 3175.8 hrs; C203 for 3840.5 hrs; C204 for 3599.3 hrs; C206 for 3020.6 hrs; C207 for 4716 hrs.

^a APCD = Air Pollution Control Device

^b CPMS = Continuous Parametric Monitoring System

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

A. Applicability

This source is subject to certain requirements of Consent Decree Case No. 2:08-CV-00167-TS-PMV (Consent Decree), filed and effective on July 3, 2012 and terminated on June 4, 2014. The Permittee shall comply with all applicable provisions of the Consent Decree as described in the Termination Clause, notwithstanding the conditions in this draft permit. The Consent Decree in its entirety has been included in Appendix A. The requirements for Wonsits Valley that survive termination are found in paragraphs 17, 19, 20 and 23.⁴

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

B. Requirements for the Glycol Dehydrator

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

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

⁴ According to EPA records, the Permittee demonstrated compliance with the initial control and monitoring device installation and performance testing requirements of the Consent Decree prior to the effective date of this permit.

- (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 back-up combustor as expeditiously as practicable. The back-up 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 during which the glycol dehydrator is operated without either: (1) a flare with the pilot flame on; or (2) the back-up combustor with its pilot flame on shall not exceed 140 hours.⁵ 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: See Section III (pp. 15 - 19) for a discussion of MACT HH requirements for the glycol dehydrator at the Wonsits Valley Compressor Station.

C. Requirements for the Condensate Storage Tank

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

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

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

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

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

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

⁵ The 140 hours are measured on a calendar year basis. Note that 40 CFR part 63 does not permit *any* operation of the glycol dehydrator (D-1) without the use of a control device. Therefore, the effect of the 140 hours provision of the Consent Decree is to limit the period during which the backup combustor may have its pilot light off, and because of the part 63 requirements, the backup combustor may only have the pilot light off if the primary combustor is in operation. That is, at all times the dehydrator is operational, the process stream must be routed to one of the two combustors, and the combustor to which the process stream is routed must be functioning.

- (c) The Permittee shall equip the combustor with thermocouples (or other heat sensing monitoring devices) to continuously monitor the presence of a pilot flame.
- 2. Requirements of Consent Decree Case No. 2:08-CV-00167-TS-PMV, Paragraph 20
 - (a) The Permittee shall monitor and record the presence of a pilot flame with a continuous recording device, such as a chart recorder or similar device.

OBSERVATION: Emissions from the condensate storage tank (Unit T-1) are routed to a Cimmaron combustor for control. The presence of a pilot flame is continuously monitored with a thermocouple. Records of thermocouple downtime information were provided to EPA upon request. See Table 11 below for thermocouple records.

D. Requirements for RICE

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

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

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

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

OBSERVATION: The engines currently installed, are equipped with an AFR and NSCR control system. Results of semi-annual performance tests for NO_x and CO conducted since the last full compliance evaluation appear to be within the allowable limits. See Table 10, p. 28.

- (b) Emissions Controls Maintenance:

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

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

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

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

- (ii) The Permittee shall retest each reciprocating internal combustion engine semi-annually using the test protocol developed from the test methods specified above. The Permittee shall submit to the EPA the test results for NO_x and CO with the respective semiannual report required in Section VI.B.1. of this permit that corresponds with the reporting period within which the test was conducted.
- (iii) Performance tests must be conducted at any load condition within plus or minus 10 % of 100 % load unless the reciprocating internal combustion engine cannot achieve plus or minus 10 % of 100 % load at the time of the test. Under such circumstances, the reciprocating internal combustion engine shall be tested at maximum achievable load, and the differential pressure across the catalyst shall be monitored and shall be maintained consistent with operating limitations in 40 CFR part 63, subpart ZZZZ. If the reciprocating internal combustion engine load is increased by 20% or greater averaged over a 30-day period commencing within 60 days of the last test, then the reciprocating internal combustion engine shall be re-tested at the newly achievable maximum load and the corresponding differential pressure established. For the purposes of this provision regarding engine load during and after performance testing, the Permittee shall monitor and record load at each engine.
- (iv) The Permittee shall select among the following test methods: 40 CFR part 60, appendix A, Method 1 or 1A - Sampling port location and number of traverse points; 40 CFR part 60, appendix A, Method 3, 3A or 3B - O₂ (oxygen) concentration at inlet and outlet; 40 CFR part 60, appendix A, Method 4 - Moisture Content; 40 CFR part 60, appendix A, Method 7E – Determination of nitrogen oxides emissions; or 40 CFR part 60, appendix A, Method 10 – Determination of carbon monoxide emissions.⁶

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

OBSERVATION: See Section IV (pp. 20 – 25) for observations regarding MACT ZZZZ requirements. Engine loads are monitored via a SCADA system. Engine loads recorded by EPA during the July 23, 2022 inspection are listed in Table 1 on p. 4.

OBSERVATION: Each of the lean-burn reciprocating internal combustion engines listed above in Table 1 is equipped with an oxidation catalyst that operates as a control device. Results of semi-annual performance tests for NO_x and CO conducted from 2018 to present are displayed in Table 9 on p. 28.

OBSERVATION: Results of required semi-annual performance tests are displayed in Table 10.

Table 10: Results of Semi-Annual NO_x and CO Performance Tests (2018 – Present)

⁶ On July 23, 2021, the U.S. Environmental Protection Agency, Department of Justice and MPLX, LP agreed to modify the terms of surviving Paragraph 23 of a Consent Decree (United States v. Questar Gas Management Co., Case No. 2:09-CV-00167-TS-PMV) to effect the following change: MPLX may use Test Method 320 of 40 CFR part 63, appendix A (Method 320) in lieu of Method 7E of 40 CFR part 60 (Method 7E) and Method 10 of 40 CFR part 60 (Method 10) for the measurement of NO_x and CO, respectively, at Wonsits Valley Compressor Station.

Emission Unit	Test Date(s)	Notification Rcvd	Report Rcvd	Avg. NO _x (g/hp-hr)	NO _x Limit (g/hp-hr)	Avg. CO (g/hp-hr)	CO Limit (g/hp-hr)	Avg. Catalyst ΔP (inches H ₂ O)	Avg. Pre-Catalyst Exhaust Gas Temp (°F)	Avg. Load
C202	5/22/2018	4/24/2018	7/26/2018	0.58	1.0	0.01	1.0	6.5	791	89.3%
C202	11/12/2018	9/13/2018	1/30/2019	0.34	1.0	0.02	1.0	6.0	796	86.7%
C202	5/30/2019	4/17/2019	7/16/2019	0.661	1.0	0.026	1.0	6.9	796	85%
C202	11/13/2019	10/22/2019	1/30/2020	0.4	1.0	0.0	1.0	7.1	780	87%
C202	5/13/2020	3/11/2020	7/2/2020	0.548	1.0	0.001	1.0	6.7	786	81%
C202	11/11/2020	9/22/2020	1/26/2021	0.60	1.0	0.00	1.0	7.2	811	82.3%
C202	5/10/2021	3/15/2021	6/14/2021	0.55	1.0	0.00	1.0	7.0	798	84.3%
C202	11/17/2021	9/14/2021	1/31/2022	0.67	1.0	0.00	1.0	6.9	783	81.0%
C203	5/21/2018	4/24/2018	8/2/2018	0.36	1.0	0.00	1.0	8.7	766	89.0%
C203	11/13/2018	9/13/2018	1/30/2019	0.44	1.0	0.00	1.0	8.3	748	80.0%
C203	5/22/2019	4/17/2019	7/16/2019	0.875	1.0	0.0378	1.0	8.7	749	84%
C203	11/13/2019	10/22/2019	1/30/2020	0.5	1.0	0.0	1.0	8.7	771	87%
C203	5/13/2020	3/11/2020	7/2/2020	0.544	1.0	0.003	1.0	8.4	769	82%
C203	11/11/2020	9/22/2020	1/26/2021	0.44	1.0	0.00	1.0	7.9	795	81.3%
C203	5/11/2021	3/15/2021	6/14/2021	0.51	1.0	0.00	1.0	11.5	775	86.3%
C203	11/17/2021	9/14/2021	1/31/2022	0.44	1.0	0.00	1.0	6.9	774	87.7%
C204	5/22/2018	4/24/2018	8/2/2018	0.33	1.0	0.02	1.0	6.1	780	93.7%
C204	11/13/2018	9/13/2018	1/30/2019	0.34	1.0	0.03	1.0	5.9	792	87.3%
C204	5/22/2019	4/17/2019	7/16/2019	0.604	1.0	0.0534	1.0	6.4	743	88%
C204	11/12/2019	10/22/2019	1/30/2020	0.5	1.0	0.0	1.0	6.2	803	88%
C204	5/14/2020	3/11/2020	7/2/2020	0.688	1.0	0.014	1.0	5.6	797	81%
C204	11/12/2020	9/22/2020	1/26/2021	0.57	1.0	0.02	1.0	5.6	794	82%
C204	5/11/2021	3/15/2021	6/14/2021	0.65	1.0	0.00	1.0	6.3	797	80%
C204	11/16/2021	9/14/2021	1/31/2022	0.57	1.0	0.00	1.0	6.6	776	83%
C206	5/30/2019	4/17/2019	7/16/2019	0.447	1.3	0.123	1.0	9.4	701	95%
C206	11/12/2019	10/22/2019	1/30/2020	0.5	1.3	0.0	1.0	8.2	776	97%
C206	5/14/2020	3/11/2020	7/2/2020	0.659	1.3	0.075	1.0	7.6	682	83%
C206	12/10/2020	9/22/2020	1/26/2021	0.62	1.3	0.09	1.0	7.8	771	83.7%
C206	5/10-5/14	3/15/2021								
C206	8/16/2021	7/15/2021	9/23/2021	0.43	1.3	0.12	1.0	7.9	748	83%
C206	11/16/2021	9/14/2021	1/31/2022	0.49	1.3	0.12	1.0	8.1	744	83%
C207 ^c	11/14/2018	9/13/2018	1/30/2019	0.63	1.0	0.08	1.0	2.4 (East/LB) 1.8 (West/RB)	770 (East/LB) 650 (West/RB)	88% (East/LB) 89% (West/RB)
C207 ^c	11/21/2018	11/19/2018	1/30/2019	0.53	1.0	0.05	1.0	2.3 (East/LB) 1.4 (West/RB)	772 (East/LB) 659 (West/RB)	92.7% (East/LB) 93.0% (West/RB)
C207 ^c	12/7/2018 ^d	11/28/2018	1/31/2019	0.59	1.0	0.05	1.0	1.6 (East/LB) 1.0 (West/RB)	760 (East/LB) n.r. (West/RB)	88% (East/LB) 88% (West/RB)
C207 ^c	5/21/2019 ^c	4/17/2019	7/16/2019	0.660	1.0	0.046	1.0	1.5 (East/LB) 2.4 (West/RB)	661 (East/LB) 760 (West/RB)	95%
C207 ^c	11/14/2019	10/22/2019	1/30/2020	0.5	1.0	0.0	1.0	2.4 (East/LB) 1.5 (West/RB)	771 (East/LB) 665 (West/RB)	91%
C207 ^c	5/12/2020	3/11/2020	7/2/2020	0.73	1.0	0.03	1.0	2.1 (East/LB)	758 (East/LB)	96%

								1.4 (West/RB)	666 (West/RB)	
C207 ^c	11/10/2020	9/22/2020	1/26/2021	0.46	1.0	0.02	1.0	2.3 (East/LB) 1.4 (West/RB)	783 (East/LB) 664 (West/RB)	88.0% (East/LB) 89.7% (West/RB)
C207 ^c	5/12/2021	3/15/2021	6/14/2021	0.57	1.0	0.03	1.0	3.0 (East) 1.3 (West)	778 (East) 670 (West)	88%
C207 ^c	11/15/2021	9/14/2021	1/31/2022	0.45	1.0	0.03	1.0	2.2 (East) 1.4 (West)	778 (East) 754 (West)	90%

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

^a ΔP = pressure drop

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

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

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

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

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

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

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

OBSERVATION: According to information provided in the opening conference by MPLX representatives on June 23, 2022, the combustor, C-2, has been removed and a permit modification is in process for Title V permit V-UO-000005-2018.01 to account for this change.

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

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

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

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

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

Reporting Period	Report Date	Report Recvd	Report Type	Notes
January 1 – June 30, 2019	7/30/19	7/31/19	SIXMON	• MACT ZZZZ: Annual performance testing for C202, C203, C204, C206, and C207 conducted in May 2019. • NSPS JJJJ: Annual performance testing for C202, C203, C204, C206, and C207 conducted in May 2019. • CD: Reported 10 instances (10 full days) on C206 during which load monitoring was not recorded due to SCADA system data loss. Reported 1 instance where SCADA system was unable to confirm presence of pilot light on combustor C-1 and flare FL-1.
January 1 – December 31, 2019	1/30/20	2/5/20	TVACC	• MACT HH: Reported total of 275 hours (174 in 1st half and 101 in 2nd half) when pilot light on FL-1 was off when dehy was running. 2 hours of missing pilot data due to SCADA data loss. • MACT ZZZZ: Reported continuous compliance for C202 and C204. Catalyst on C207 replaced on 11/28/2018 but never tested. Catalyst replaced again (due to fouling of previous catalyst by coolant) on 5/14/2019 and tested on 5/21/2019 (deviation from 11/28/18 – 5/13/19). Total of 1.25 hours bad catalyst inlet temp data due to communications loss. • NSPS JJJJ: Reported continuous compliance for all engines. • CD Requirements: Reported 2 hours of missing pilot data on tank combustor (C-1). Reported that no load data collected on C206 from 5/16/19 – 12/31/19 due to SCADA data loss. • Facility-wide: Reported continuous compliance with all other Title V provisions.
July 1 – December 31, 2019	1/30/20	2/5/20	SIXMON	• MACT HH: 101 hours of flare downtime when dehy operating. One hour of missing pilot light data. • MACT ZZZZ: 1.25 total hours bad catalyst inlet temp data. • CD Requirements: NOx and CO testing on C202, C203, C204, C206, and C207 conducted November 2019. Load data for C206 not collected during the reporting period due to SCADA data collection issues; MPLX troubleshooting the issue. 1 hr of missing pilot light data on tank combustor (C-1).

January 1 – June 30, 2020	7/30/20	7/30/20	SIXMON	• Performance testing for MACT ZZZZ, NSPS JJJJ, and CD requirements conducted on C202, C203, C204, C206, and C207 in May 2020. • Load data for C206 not collected until 2/5/2020 due to SCADA data collection issues. • MACT HH: 4 hrs of flare pilot downtime when dehy operating. • Tank Combustor Monitoring: 3 hours where tank combustor status indicated off; total operating time = 4,368.0 hrs
January 1 – December 31, 2020	1/26/21	1/26/21	TVACC	• MACT HH: Reported total of 1 hr when pilot light data on FL-1 and C-2 missing due to SCADA system data loss; 4.02 hrs when pilot on FL-1 off and dehy running. • MACT ZZZZ: Reported 1.5 hrs of “bad catalyst inlet temperature data” on C202, C203 and C204 and 1.75 hrs on C206 and C207 due to a communications loss. • NSPS JJJJ: Reported continuous compliance for all engines. • CD Requirements: Reported 1 hr of missing pilot data on C-1, which controls tank T-1. • Facility-wide: Reported continuous compliance with all other Title V provisions.
July 1 – December 31, 2020	1/26/21	1/26/21	SIXMON	• MACT HH: 1 minute of deviation reported during station ESD – pilot on FL-1 off while dehy pump reported as running. • MACT ZZZZ: Reported CPMS Monitoring conducted. No performance testing on engines C202, C203, C204, C206, and C207 conducted in 2nd half of 2020 as conducted May 2020. • NSPS JJJJ: No performance testing on engines C202, C203, C204, C206, and C207 conducted in 2nd half of 2020 as conducted May 2020. • CD Requirements: Semi-annual NOX and CO performance testing on C202, C203, C204, C206, and C207 conducted in November and December 2020.
January 1 – June 30, 2021	7/16/2021	7/16/2021	SIXMON	• MACT HH: No deviations reported. • MACT ZZZZ: Annual performance testing on engines C202, C203, C204, and C207 conducted in May 2021. C206 was down for maintenance and not tested. Plan to test on 8/16/2021. • NSPS JJJJ: Annual performance testing on C202, C203, C204, and C207 conducted May 2021. C206 was down for maintenance and not tested. Plan to test on 8/16/2021. • CD Requirements: Semi-annual NOX and CO testing conducted on C202, C203, C204, and C207 in May 2021. C206 was down for maintenance and not tested. Plan to test on 8/16/2021.

				• 7 hours of tank combustor downtime reported.
1/1/2021 – 12/31/2021	1/31/2022	1/31/2022	TVACC	• MACT HH: Reported that C-2 has been disconnected from the CVS; FL-1 is the only MACT HH control device on D-1. • MACT ZZZZ: Reported 9.25 hrs of inoperative CPMS on C207 due to temperature transmitter failure and 0.5 hrs of inoperative CPMS on all other engines due to loss of comms. • NSPS JJJJ: Reported continuous compliance for all engines. • CD Requirements: Reported 140 hrs of missing pilot data on C-1, which controls tank T-1 (139 hrs attributed to loss of communications and 1 hr attributed to data loss). • Facility-wide: Reported continuous compliance with all other Title V provisions.
7/1/2021 – 12/31/2021	1/31/2022	1/31/2022	SIXMON	• MACT HH: Reported that CVS inspection conducted in first half of 2021. C-1 disconnected, and FL-1 is now the only control device for D-1. Reported that when FL-1 pilot out, glycol pump on D-1 immediately shuts off. • MACT ZZZZ: Annual performance testing conducted in 1st half of 2021 for C202, C203, C204, and C207. C206 tested on 8/16/2021. 6.75 hours of deviations reported on catalyst inlet temperature data for C207. • NSPS JJJJ: Performance testing conducted in 1st half of 2021 for C202, C203, C204, and C207. C206 tested on 8/16/2021. • CD Requirements :Semi-annual NOX and CO testing conducted on C202, C203, C204, C206, and C207 in November 2021. •

2. “Deviation” means any situation in which an emissions unit fails to meet a permit term or condition. A deviation is not always a violation. A deviation can be determined by observation or through review of data obtained from any testing, monitoring or recordkeeping established in accordance with § 71.6(a)(3)(i) and (a)(3)(ii). For a situation lasting more than 24 hours which constitutes a deviation, each 24-hour period is considered a separate deviation. Included in the meaning of deviation are any of the following:
 - (a) A situation where emissions exceed an emission limitation or standard;
 - (b) A situation where process or emissions control device parameter values indicate that an emission limitation or standard has not been met; or
 - (c) A situation in which observations or data collected demonstrate noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit.
3. The Permittee shall promptly report to the EPA deviations from permit requirements, including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. “Prompt” is defined as follows:

- (a) Any definition of “prompt” or a specific time frame for reporting deviations provided in an underlying applicable requirement as identified in this permit.
- (b) Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations will be submitted based on the following schedule:
 - (i) For emissions of a HAP or a toxic air pollutant (as identified in the applicable regulation) that continue for more than an hour in excess of permit requirements, the report shall be made within 24 hours of the occurrence.
 - (ii) For emissions of any regulated air pollutant, excluding a HAP or a toxic air pollutant that continues for more than 2 hours in excess of permit requirements, the report shall be made within 48 hours.
 - (iii) For all other deviations from permit requirements, the report shall be submitted with the semi-annual monitoring report.
- (c) If any of the conditions in (i) or (ii) of paragraph (b) above are met, the Permittee shall notify the EPA by telephone (1-800-227-6312), facsimile (303-312-6409), or by email to r8airreportenforcement@epa.gov based on the timetables listed above. *[Notification shall specify that this notification is a deviation report for a Part 71 permit]*. A written notice, certified consistent with the Submissions section of this permit shall be submitted within ten working days of the occurrence. All deviations reported under this section shall also be identified in the 6-month report required under Condition 1 in this section of this permit.

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

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

VII. General Provisions

A. Annual Fee Payment [40 CFR 71.9]

1. The Permittee shall pay an annual permit fee in accordance with the procedures outlined below.
2. The Permittee shall pay the annual permit fee each year no later than April 1st. The fee shall cover the previous calendar year.
3. The fee payment shall be in United States currency and shall be paid by money order, bank draft, certified check, corporate check, or electronic funds transfer payable to the order of the U.S. Environmental Protection Agency.
4. The Permittee shall send fee payment and a completed fee filing form to:

For regular U.S. Postal Service mail
(FedEx, Airborne, DHL, and UPS)

U.S. Environmental Protection Agency
FOIA and Miscellaneous Payments
Cincinnati Finance Center

For non-U.S. Postal Service express mail

U.S. Bank
Government Lockbox 979078
U.S. EPA FOIA & Misc. Payments

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

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

6. Basis for calculating annual fee:

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

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

- (b) The annual emissions fee shall be increased by a greenhouse gas (GHG) fee adjustment for any source that has initiated an activity listed in table at § 71.9(c)(8) since the fee was last paid. The GHG fee adjustment shall be equal to the set fee provided in the table at § 71.9(c)(8) for each activity that has been initiated since the fee was last paid.
- (c) The Permittee shall exclude the following emissions from the calculation of fees:
- (i) The amount of actual emissions of each regulated pollutant (for fee calculation) that the source emits in excess of 4,000 tpy;
- (ii) Actual emissions of any regulated pollutant (for fee calculation) already included in the fee calculation; and
- (iii) The quantity of actual emissions (for fee calculation) of insignificant activities [defined in 40 CFR 71.5(c)(11)(i)] or of insignificant emissions levels from emissions at the source identified in the Permittee’s application pursuant to 40 CFR 71.5(c)(11)(ii).

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

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

8. The Permittee shall retain fee calculation worksheets and other emissions-related data used to determine

fee payment for 5 years following submittal of fee payment. [Emission-related data include, for example, emissions-related forms provided by the EPA and used by the Permittee for fee calculation purposes, emissions-related spreadsheets, and emissions-related data, such as records of emissions monitoring data and related support information required to be kept in accordance with 40 CFR 71.6(a)(3)(ii).]

9. Failure of the Permittee to pay fees in a timely manner shall subject the Permittee to assessment of penalties and interest in accordance with 40 CFR 71.9(l).
10. When notified by the EPA of underpayment of fees, the Permittee shall remit full payment within 30 days of receipt of notification.
11. A Permittee who thinks an EPA-assessed fee is in error and who wishes to challenge such fee, shall provide a written explanation of the alleged error to the EPA along with full payment of the EPA assessed fee.

OBSERVATION: Annual fees received for Wonsits for the 2019, 2020, 2021 reporting years are displayed in Table 12, below.

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

Date Received	Reporting Year	Fee Paid
April 1, 2020	2019	\$6,435.68
March 30, 2021	2020	\$4,438.98
March 30, 2022	2021	\$4,892.01

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

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

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

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

Pollutant	Actual Emissions (tpy)		
	2019	2020	2021
NO _x	58.4	57.3	69.8
VOC	58.1	21.0	13.1
SO ₂	0.1	0.2	0.1
PM ₁₀	3.0	2.9	4.0
Lead	0.0	0.0	0.0
Total HAPs	8.7	9.4	12.8

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

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

1. Compliance with the Permit

- (a) The Permittee must comply with all conditions of this Part 71 permit. Any permit noncompliance constitutes a violation of the CAA and is grounds for enforcement action;
- (b) For permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- (c) It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) For the purpose of submitting compliance certifications in accordance with §71.6(c)(5) or establishing whether or not a person has violated or is in violation of any requirement of this permit, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

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

- (a) For applicable requirements with which the source is in compliance, the source will continue to comply with such requirements.
- (b) For applicable requirements that will become effective during the permit term, the source shall meet such requirements on a timely basis.

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

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

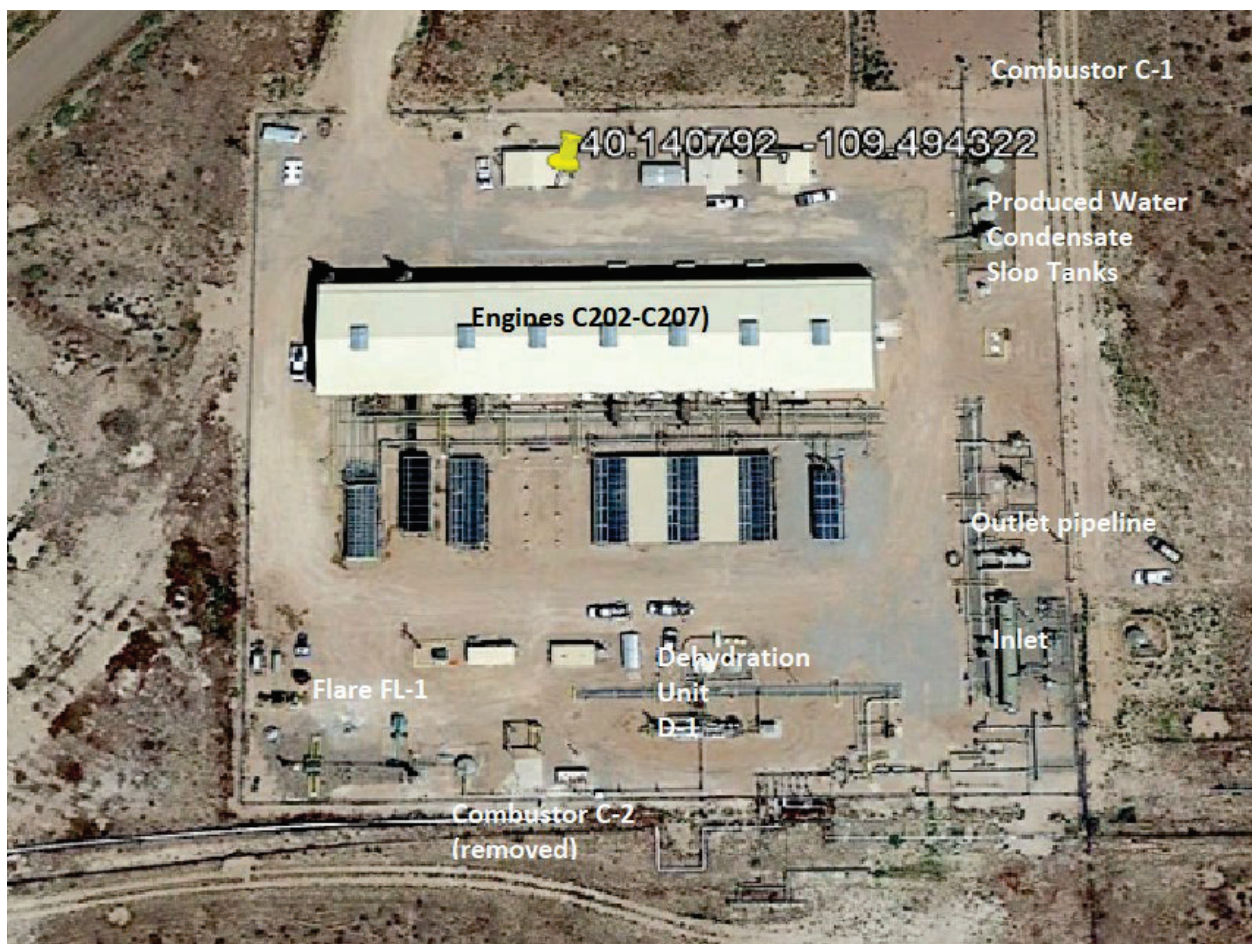
[Explanatory note: To help Part 71 Permittees meet reporting responsibilities, the EPA has developed a reporting form for annual compliance certifications. The form may be found on the EPA's website at: <https://www.epa.gov/title-v-operating-permits/epa-issued-operating-permits/>]

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

- (i) Identification of each permit term or condition that is the basis of the certification;
- (ii) The identification of the method(s) or other means used for determining the compliance status of each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required in this permit. If necessary, the Permittee also shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the CAA, which prohibits knowingly making a false certification or omitting material information;
- (iii) The status of compliance with each term and condition of the permit for the period covered by the certification based on the method or means designated in (ii) above. The certification shall identify each deviation and take it into account in the compliance certification;
- (iv) Such other facts as the EPA may require to determine the compliance status of the source; and
- (v) Whether compliance with each permit term was continuous or intermittent.

OBSERVATION: Title V Annual Compliance Certifications (TVACCs) submitted since the previous full compliance evaluation are shown in Table 11, p30.

APPENDIX A: Site Overview



APPENDIX B: Photo Log

File Name	Description	Photographer
MOV_2968	Compressor C207	M. Stovern

APPENDIX C: Consent Decree Termination

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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