

Andeavor Field Services LLC – Coyote Wash Compressor Station Off-Site Full Compliance Evaluation (FCE)

Inspection Date: September 2, 2021

Inspection Report Date: October 29, 2021

EPA Representatives: Sara Loiacono, Environmental Scientist, Enforcement and Compliance Assurance Division, Air and Toxics Enforcement Branch, US EPA Region 8

Tribal Representatives: N/A

Company Representatives: Thomas Gibbons, HES Professional, MPLX
Kenan Bisic, HES Professional, MPLX

Inspection Report Prepared By: Sara Loiacono, Environmental Scientist, US EPA Region 8 *SL*

Inspection Report Reviewed By: Scott Patefield, Chief, Enforcement and Compliance Assurance Division, Air and Toxics Enforcement Branch
Patefield, Scott
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Date: 2021.10.29 16:22:55 -06'00'

Last Inspection: March 12, 2019

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)
Consent Decree Case No. 2:08-CV-00167-TS-PMW

Permit Number: V-UO-000015-2018.00 Issue Date: May 13, 2020
Replaces Permit No.: V-UO-000015-2006.00 Effective Date: June 12, 2020
Expiration Date: June 12, 2025

Facility Information and Emission Unit Identification

Parent Company Name: MPLX LP (MPLX)¹
Mailing Address: 1515 Arapahoe Street, Tower, Suite 1600, Denver, Colorado 80202
Facility Contact: Thomas Gibbons, HES Professional
(303) 454-6685
Facility Operator & Name: Andeavor Field Services LLC (Andeavor)²

¹ MPLX is the parent company of Andeavor Field Services LLC.

² According to information provided via email by Mr. Gibbons on October 9, 2021, the owner of the Walker Hollow Compressor Station is Andeavor Field Services LLC, the operator is MPLX LP, and the current responsible official is Darren Snow.

Facility Location: Latitude 40.038389, Longitude -109.441333
County, State: Uintah, Utah
Reservation: Uintah and Ouray Indian Reservation
Tribe: Ute Indian Tribe
Responsible Official: Darren Snow, North West Region Director²
SIC Code: 1311 – Crude Petroleum and Natural Gas
AFS ID: 49-047-00107
Other CAA Permits: There are no other CAA permits for this facility.

Enforcement History

Questar Gas Management Company, a predecessor of Andeavor, 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 B); however, several requirements survive termination of the decree. (See Section IV of this report.)

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

- (1) Failure to conduct performance tests after catalyst replacement on Engine C300, 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 II.C.1 and II.E.2 of the previous Title V permit for the Coyote Wash Compressor Station, Permit Number V-UO-000015-2006.00;
- (2) Failure to timely submit MACT ZZZZ performance test results for Engines C100, C200, C300, C400, and C500, in violation of the reporting requirements at § 63.7(g)(1);
- (3) Failure to timely submit NSPS JJJJ performance test results for Engine C500, in violation of the reporting requirements at 40 C.F.R. § 60.4245(d); and
- (4) Emitting NO_x in excess of 1.0 g/hp-hr from Engine C400, in violation of the emission limits set forth for Engine C400 in Permit Number V-UO-000015-2006.00.

Inspection Findings/Areas of Concern

- (1) Based on catalyst inlet temperature data submitted by MPLX for the period covered by this compliance evaluation, it appears as if there are errors in the methodology used to automatically compute catalyst inlet temperature 4-hour rolling averages when engines have operated for less than four consecutive hours. The EPA recommends that MPLX work on updating its system to correctly calculate averages following periods of engine downtime. See Section III.E. and footnote 7 for details.

Compliance Assistance

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

General Inspection Observations and Commentary

In an email on September 2, 2021, Ms. Loiacono informed Mr. Kenan Basic and Mr. Thomas Gibbons, of MPLX LP, that the EPA was conducting an off-site full compliance evaluation of the Coyote Wash Compressor Station. In the email, Ms. Loiacono requested information and documentation related to compliance with the facility's Title V permit and other applicable regulations (i.e. MACT ZZZZ, NSPS JJJJ). Mr. Gibbons provided the requested information via email on October 9, 2021. Supplemental information was requested by Ms. Loiacono via email on October 14, 2020. Mr. Gibbons provided the requested supplemental information in an email on October 29, 2021.

Description of Operations³

The Coyote Wash Compressor Station gathers gas from surrounding well sites via a gas gathering pipeline system. The gas undergoes a natural separation process in the inlet separator that separates the gas from the liquids. The inlet gas is routed to the compression stage where it is compressed from field pressure to approximately 1,000 psi. The compressed gas is then routed to the sales gas pipeline. The liquids are routed to the on-site flash tank separator; flash emissions from the flash tank separator are captured by a vapor recovery unit (VRU). Vapors from the VRU are compressed by an electric compressor on site and routed back to the facility's gas inlet. Vapors from the flash tank separator are routed to a combustor (C-1), via a slop tank, when the VRU and electric compressor are not operating. Condensate liquids dropping out of the flash tank are pumped to a gas plant; the produced water from the flash tank separator is routed to a 300-barrel produced water storage tank. Information provided in the June 2018 Title V renewal application submitted for the Coyote Wash Compressor Station indicates that instrument air is utilized on site for energizing pneumatic equipment.

³ The description of operations provided here is a modified excerpt from the process description provided by MPLX (then Andeavor) in its June 2018 Title V renewal application.

Potential to Emit (PTE)

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

See Table 1, below, for facility-wide and emission unit-specific PTE data included in the Statement of Basis for Permit No. V-UO-000015-2018.00 for the Coyote Wash Compressor Station. The PTE totals below include reductions from legally and practically enforceable requirements set forth in the Title V permit. Table 1 also contains the total PTE for all insignificant emissions units.

**Table 1: Potential to Emit in Tons Per Year (tpy)
Coyote Wash Compressor Station**

Regulated Air Pollutants (tpy)							
	NO _x ^a	CO ^a	VOC	PM	SO ₂	CH ₂ O	Total HAP
C100	20.72	20.72	35.14 ^b	0.70	0.04	2.07	2.71
C200	20.72	20.72	35.14 ^b	0.70	0.04	2.07	2.71
C300	44.30	44.30	40.14 ^b	1.51	0.09	3.99	5.36
C400	44.30	44.30	40.14 ^b	1.51	0.09	3.99	5.36
C500	44.30	44.30	40.14 ^c	1.51	0.09	3.99	5.36
BC100	14.29	14.29	5.31 ^b	1.09	0.03	0.17	0.48
T-3 – T-7	-	-	0.38	-	-	-	0.04
C-1	0.01	-	-	-	-	-	-
EL	-	-	5.46	-	-	-	0.33
ES	-	-	0.37	-	-	-	0.01
CB	-	-	11.03	-	-	-	0.31
ESD	-	-	0.32	-	-	-	0.009
PG	-	-	0.27	-	-	-	0.008
G-1	1.19	1.997	0.02	0.01	-	0.01	0.017
Total	188.84	190.64	213.86	7.05	0.38	16.29	22.70

^a NO_x and CO emissions from C100, C200, C300, C400, C500, and BC100 in Table 2 are based on the enforceable emission limits of 1.0 g/hp-hr NO_x and 1.0 g/hp-hr CO, as specified in the Consent Decree Case No. 2:08-CV-00167-TS-PMV and memorialized in Permit Condition IV.B.1(a)(ii).

^b The Statement of Basis accounts for VOC emission reductions; however, no enforceable VOC emission limits apply to C100, C200, C300, C400, and BC100; therefore, reductions in VOC emissions are not accounted for in this table.

^c C500 is subject to the Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (NSPS JJJJ). An enforceable VOC emission limit of 1.0 g/hp-hr applies to the engine.

NO_x = oxides of nitrogen; CO = carbon monoxide; VOC = volatile organic compounds; PM = particulate matter;
SO₂ = sulfur dioxide; CH₂O = formaldehyde; HAP = hazardous air pollutants

Permit Number V-UO-000015-2018.00 Requirements and Compliance Status

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

I. Facility Emission Points and Unit-Specific Information

Table 2: Source Emission Points

Emission Unit ID	Description	Control Equipment
C100	Caterpillar G3608LE; 2,146 hp 4-Stroke Lean-Burn Reciprocating Internal Combustion Engines Natural Gas-Fired Serial No. BEN00280 Installed: 9/2005 Manufactured: 6/15/2005	Oxidation Catalyst
C200	Serial No. BEN00281 Installed: 9/2005 Manufactured: 7/14/2005	
C300	Caterpillar G3616LE; 4,588 hp 4-Stroke Lean-Burn Reciprocating Internal Combustion Engines Natural Gas-Fired Serial No. BLB00311 Installed: 4/2007 Manufactured: 6/16/2006	Oxidation Catalyst
C400	Serial No. 4CG00082 Installed: 9/2007 Manufactured: 3/21/2007	
C500	Serial No. BLB00386 Installed: 7/2008 Manufactured: 9/27/2007	
BC100	Waukesha 7042GSI, Booster Compressor; 1,480 hp 4-Stroke Rich-Burn Reciprocating Internal Combustion Engine Natural Gas-Fired Serial No. 387747 Installed: 3/1/2006 Manufactured: 1985	NSCR and AFR
T-3	Miscellaneous Chemical Storage Tanks 100 bbl Ethylene Glycol	None (IEU)
T-4	100 bbl Lube Oil	
T-5	100 bbl Used Oil	
T-6	100 bbl Used Ethylene Glycol	
T-7	300 bbl Produced Water Tank	
T-7	300 bbl Slop Tank	Combustor (C-1) (IEU)
EL	Equipment Leaks	None
PG	Pigging Operations	None (IEU)
ES	Engine Start-ups	None (IEU)
CB	Compressor Blowdowns	None
ESD	Emergency Shutdowns	None (IEU)
C-1	Flameco 0.018 MMBtu/hr Combustor	Emissions Unit C-1 Control Device
G-1 ^a	Ford WSG 1068 Emergency Generator Engine, 197 hp 4-Stroke Rich-Burn Reciprocating Internal Combustion Engine Natural Gas-Fired Serial No. 06PS62586 Installed: 11/2006 Manufactured: 11/2006	None (IEU)

hp = horsepower; NSCR = non-selective catalytic reduction; AFR = air-to-fuel ratio controller; MMBtu/hr = million British thermal units per hour; IEU = Insignificant Emissions Unit

OBSERVATION: Mr. Gibbons provided photographs of nameplates for C100, C200, C300, C400, C500, and BC100. Make, model, and serial number information from the nameplates matched the information listed in the permit.

Table 3: Requirements for Emission Units

Equipment	Applicable Requirements	Limitations	Control Equipment	Monitoring	
				Method	Interval
C100, C200 (2) 2,146 hp 4SLB Caterpillar G3608LE C300, C400 (2) 4,588 hp 4SLB Caterpillar G3616LE	MACT ZZZZ	Reduce CO emissions by $\geq 93\%$ Maintain catalyst inlet temperature between 450 – 1,350 °F Maintain pressure drop (ΔP) across catalyst to within ± 2 inches of the baseline	Oxidation Catalyst	Performance test CPMS ^b : Catalyst Inlet Temp. and ΔP Record Temp. Record ΔP	Semi-Annual ^a Continuous Every 15 minutes; calculate 4-hour averages Monthly
	Consent Decree (CD)	NO _x = 1.0 g/hp-hr CO = 1.0 g/hp-hr		Performance test	Semi-Annual ^a
C500 4,588 hp 4SLB Caterpillar G3616LE	MACT ZZZZ	Reduce CO emissions by $\geq 93\%$ Maintain catalyst inlet temperature between 450 – 1,350 °F Maintain pressure drop (ΔP) across catalyst to within ± 2 inches of the baseline	Oxidation Catalyst	Performance test CPMS ^b : Catalyst Inlet Temp. and ΔP Record Temp. Record ΔP	Semi-Annual ^a Continuous Every 15 minutes; calculate 4-hour averages Monthly
	NSPS JJJJ	NO _x = 2.0 g/hp-hr or 160 ppmvd @ 15% O ₂ CO = 4.0 g/hp-hr or 540 ppmvd @ 15% O ₂ VOC = 1.0 g/hp-hr or 86 ppmvd @ 15% O ₂		Performance test	Annual
	Consent Decree (CD)	NO _x = 1.0 g/hp-hr CO = 1.0 g/hp-hr		Performance test	Semi-Annual ^a
BC100 1,478 hp 4SRB Waukesha 7042GSI	MACT ZZZZ	Reduce formaldehyde emissions by $\geq 76\%$ Maintain catalyst inlet temperature between 750–1,250 °F Maintain pressure drop (ΔP) across catalyst to within ± 2 inches of the baseline	NSCR w/ AFR	Performance test CPMS ^b : Catalyst Inlet Temp. and ΔP Record Temp. Record ΔP	Initial and following catalyst changeout Continuous Every 15 minutes; calculate 4-hour averages Monthly
	Consent Decree (CD)	NO _x = 1.0 g/hp-hr CO = 1.0 g/hp-hr Replace oxygen sensor in AFR every 2,000 hours of engine run time		Performance Test Monitor hours of operation with non-resettable hour meter	Semi-Annual ^a Daily
G-1 197 hp 4SRB Ford WSG 1068	MACT ZZZZ	No requirements – gap engine			

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

^b CPMS = Continuous Parametric Monitoring System

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

A. Applicability [40 CFR § 60.4230]

1. 40 CFR Part 60, Subpart JJJJ (Subpart JJJJ) applies to the following emission unit:
 - (a) Caterpillar G3616LE 4SLB RICE identified as C500 in Table 2 of this permit;
2. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of Subpart JJJJ.

OBSERVATION: Engine C500 is a spark ignition (SI), internal combustion engine (ICE) with a maximum engine power $\geq$ 500 hp that was constructed after June 12, 2006 and manufactured after July 1, 2007; therefore, pursuant to 40 C.F.R. § 60.4230(a)(4)(i), NSPS JJJJ applies.

C. Emission Standards [40 CFR § 60.4233(e) and Table 1 to Subpart JJJJ, § 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, for C500, as specified in § 60.4233(e).
2. The Permittee must operate and maintain the stationary SI ICE subject to the emission standards as required in § 60.4233 over the entire life of the engine, as specified in § 60.4234.

OBSERVATION: Pursuant to 40 C.F.R. § 60.4233(e) and NSPS JJJJ Table 1, engine C500 utilizes an oxidation catalyst for emissions control to meet the following emission standards for non-emergency, natural gas SI engines greater than or equal to 500 hp that were manufactured on or after July 1, 2007:

NO_x = 2.0 g/hp-hr or 160 ppmvd at 15% O₂

CO = 4.0 g/hp-hr or 540 ppmvd at 15% O₂

VOC = 1.0 g/hp-hr or 86 ppmvd at 15% O₂

See Table 4, p. 8, for results of NSPS JJJJ performance tests that have been conducted on engine C500 since the previous compliance evaluation.

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

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

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

or

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

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

As an owner or operator of a stationary SI ICE greater than 1,350 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 practices for minimizing emissions. In addition, the Permittee shall conduct an initial performance test and conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first thereafter, to demonstrate compliance.

Note to Permittee: The initial performance testing has been satisfied for C500 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: Engine C500 is a non-certified engine and therefore must comply with § 60.4243(b)(2). Pursuant to § 60.4243(b)(2)(ii), MPLX must keep a maintenance plan and records of conducted maintenance on C500 and must operate the engine in a manner consistent with good air pollution control practices. MPLX provided maintenance records for C500 to the EPA upon request. See Section II.E., below, for engine C500 performance test information.

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

The Permittee shall comply with the performance testing requirements for the non-emergency, SI ICE greater than 1,350 hp, as specified in §§ 60.4244 (a)-(f), for Emissions Unit C500.

OBSERVATION: Three NSPS JJJJ performance tests have been conducted on C500 since the previous full compliance evaluation. See Table 4, below, for results.

Table 4: Results of NSPS JJJJ Performance Testing (NO_x, CO, VOC)

Emission Unit ID	S/N	Test Date	Date Test Report Received	Avg. NO _x	NO _x Limit	Avg. CO	CO Limit	Avg. VOC	VOC Limit	Avg. Load	Engine Runtime (hrs)
				(g/hp-hr)							
C500	BLB00386	3/26/2019	5/28/2019	0.285	2.0	0.02	4.0	0.0002	1.0	88%	67,051.1
C500	BLB00386	3/19/2020	5/14/2020	0.337	2.0	0.026	4.0	0.062	1.0	87%	not reported ⁴
C500	BLB00386	3/30/2021	5/5/2021	0.24	2.0	0.02	4.0	0.27	1.0	82%	82,273

⁴ According to information provided by Mr. Gibbons in an email on October 9, 2021, the exact runtime on C500 was not recorded at the time of the March 19, 2020, test. However, in an email on October 29, 2021, Mr. Gibbons stated that the runtime interval between the March 19, 2020, test and the previous test on March 26, 2019, was 7,124 hours (inclusive of the test dates). Based on this information, the cumulative runtime on C500 would have been approximately 74,175.1 hours at the time of the March 19, 2020, test.

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

(g) The Permittee shall comply with all of the applicable notification, reporting, and recordkeeping requirements for non-emergency SI ICE greater than 1,350 hp, as specified in § 60.4245, for Emissions Unit C500, except that reports of required performance tests shall be submitted with the respective semiannual report required in Section V.B.1. of this permit that corresponds with the reporting period within which the test was conducted.

OBSERVATION: Pursuant to § 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. Test reports for the March 19, 2020, and March 30, 2021, performance tests were submitted within the required 60-day timeline. The test report for the March 26, 2019, test was submitted more than 60 days following completion of the test.

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

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

A. Applicability [40 CFR § 63.6585]

1. 40 CFR Part 63, Subpart ZZZZ applies to the following emission units:

- (a) Caterpillar G3608LE engine identified as C100 in Table 2 of this permit;
- (b) Caterpillar G3608LE engine identified as C200 in Table 2 of this permit;
- (c) Caterpillar G3616LE engine identified as C300 in Table 2 of this permit;
- (d) Caterpillar G3616LE engine identified as C400 in Table 2 of this permit;
- (e) Caterpillar G3616LE engine identified as C500 in Table 2 of this permit; and
- (f) Waukesha 7042GSI engine identified as BC100 in Table 2 of this permit.

2. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of Subpart ZZZZ.

OBSERVATION: Engines C100, C200, C300, C400, and C500 are new (constructed on or 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 the emissions limitations in MACT ZZZZ Table 2a (#2) and the operating limitations in Table 2b (#1).

Engine BC100 is an existing (constructed before December 19, 2002), 4-stroke rich burn (4SRB), SI, natural gas-fired engine with greater than 500 hp located at a major source of HAP. This engine is subject to the emission limitations in MACT ZZZZ Table 1a (#1) and the operating limitations in Table 1b (#1).

Emergency generator (G-1) is a stationary RICE with less than or equal to 500 hp. According to information submitted by Mr. Gibbons in an email on October 29, 2021, the generator was constructed in

November 2006.⁵ Pursuant to § 63.6590(a)(1)(ii) and (2)(ii), a stationary RICE with a site rating of less than or equal to 500 bhp located at a major source of HAP emissions is considered an existing engine if it commenced construction before June 12, 2006 and is considered new if it commenced construction on or after June 12, 2006. Since G-1 was constructed after June 12, 2006, it is considered a new stationary RICE located at a major source of HAP.⁶

According to § 63.6590(c)(6), a new or reconstructed emergency or limited use stationary RICE with a site rating of less than or equal to 500 hp at a major source of HAP emissions must meet the requirements of MACT ZZZZ by complying with NSPS JJJJ. However, pursuant to § 60.4230(a)(4)(iv), NSPS JJJJ applies only to owners and operators of stationary internal combustion engines that commence construction after June 12, 2006 and are manufactured on or after January 1, 2009. Since, G-1 was manufactured prior to January 1, 2009, NSPS JJJJ does not apply and G-1 is considered what is commonly referred to as a “gap engine” and has no emissions or operational requirements to meet under MACT ZZZZ or NSPS JJJJ.

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 hazardous air pollutants (HAP) emissions, specified in § 63.6600(b), for engines C100, C200, C300, C400 and C500. The Permittee shall comply with the emissions limitations and operating limitations for stationary 4SRB RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions, specified in § 63.6600(a), for engine BC100.
2. Pursuant to § 63.6600, compliance with the numerical emissions limitations for stationary 4SLB and 4SRB RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions established in Subpart ZZZZ, for engines C100, C200, C300, C400, C500 and BC100, shall be based on the results of testing the average of three 1-hour or longer runs using the testing requirements and procedures in § 63.6620 and Table 4 of Subpart ZZZZ.
3. The Permittee shall demonstrate compliance with general requirements for engines C100, C200, C300, C400, C500 and BC100 according to § 63.6605(a).
4. The Permittee must operate and maintain engines C100, C200, C300, C400, C500 and BC100, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times. The general duty to minimize emissions does not require the Permittee to make any further efforts to reduce emissions if the required levels have been achieved. Determination of whether such operations and maintenance procedures are being used will be based on information available to the EPA, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records and inspection of the source, as specified in § 63.6605(b).

⁵ 40 C.F.R. § 63.2 defines “commenced” as meaning “with respect to construction or reconstruction of an affected source, that an owner or operator has undertaken a continuous program of construction or reconstruction or that an owner or operator has entered into a contractual obligation to undertake and complete, within a reasonable time, a continuous program of construction or reconstruction.” “Construction” is defined as “the on-site fabrication, erection, or installation of an affected source.”

⁶ According to the information submitted by QEP Field Services Company (a predecessor to Andeavor) in its September 2014 Title V Minor Permit Modification and by MPLX (then Andeavor) in its June 2018 Title V permit application, emergency generator (G-1) is a stationary RICE with less than or equal to 500 hp that was constructed after June 12, 2006 and is, therefore, considered a new stationary RICE located at an area source of HAP. However, it should be noted that, considering legally and practically enforceable controls, total formaldehyde (CH₂O) emissions at the Coyote Wash Compressor Station are greater than or equal to 10 tpy (see Table 2, p. 5), which makes the facility a major source of HAP emissions since it has the potential to emit a single HAP at a rate of 10 tons or more per year. (See § 63.6585(b).)

OBSERVATION: Pursuant to 40 C.F.R. § 63.6600(b) and Table 2a (#2), engines C100, C200, C300, C400, and C500 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 Coyote Wash comply with MACT ZZZZ by meeting the 93% CO reduction limitation. In accordance with Table 3 (#1) to MACT ZZZZ, compliance with reduction requirements is determined through semi-annual performance testing. Pursuant to 40 C.F.R. § 63.6600(a) and Table 1a, BC100 must comply with MACT ZZZZ by either reducing formaldehyde emissions by 76% or more or limiting the concentration of formaldehyde in the exhaust to 350 ppbvd or less at 15% O₂. MPLX elects to comply with MACT ZZZZ using the formaldehyde percent reduction option for BC100.

See Table 5, p. 13 for results of MACT ZZZZ performance tests that have been conducted at the Coyote Wash Compressor Station since the previous full compliance evaluation.

C100, C200, C300, C400, and C500 must 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 1,350°F, and (2) maintaining the pressure drop across the catalyst to within 2 inches of water of the baseline pressure drop recorded during the performance test that established baseline operating parameters (at 100% load ± 10%). As an existing 4SRB RICE > 500 hp, BC100 must meet the continuous monitoring requirements of MACT ZZZZ Table 1b (#1) by: (1) maintaining the pressure drop across the catalyst to within 2 inches of water of the baseline pressure drop (at 100% load ± 10%), and (2) maintaining the catalyst inlet temperature within 750 – 1,250°F.

Pursuant to Table 6 (#1) and (#4) of MACT ZZZZ, to demonstrate continuous compliance with CPMS requirements, MPLX must collect catalyst inlet 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 the EPA, Mr. Gibbons provided catalyst temperature data and monthly pressure drop readings covering the period of March 1, 2019 through September 1, 2021, for all engines at the Coyote Wash Compressor Station that are subject to MACT ZZZZ. See the observations in Section III.E. for details.

As discussed in Section III.A., above, no MACT ZZZZ emission or operating limitations appear to apply to generator G-1.

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 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 C100, C200, C300, C400, C500 and BC100.
2. The Permittee shall conduct subsequent performance tests for stationary 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 C100, C200, C300, C400, C500 and BC100.
3. The Permittee shall use the performance tests and other procedures for stationary 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 C100, C200, C300, C400, C500 and BC100.

OBSERVATION: Pursuant to § 63.6615, § 63.6620 and Table 3 to MACT ZZZZ, MPLX must conduct semiannual performance tests on engines C100, C200, C300, C400, C500, and BC100 with the option of moving to annual testing after two consecutive successful semi-annual tests. MPLX is currently conducting MACT ZZZZ testing on an annual basis.

Pursuant to § 63.6620(b), an engine does not need to be started up solely to conduct performance testing. According to information provided by MPLX in the October 9, 2021, email submission from Mr. Gibbons, engine C100 last operated on September 21, 2019, and engine C200 last operated November 1, 2019; therefore, the engines have not been tested since August 2019.

See Table 5, p. 13, for results of MACT ZZZZ performance tests conducted since the previous full compliance evaluation.

It should be noted that the EPA has not received MACT ZZZZ test results for BC100 since the initial performance test in 2012, and according to information provided by MPLX, the engine last operated July 12, 2017. Subsequent performance testing to demonstrate compliance under MACT ZZZZ does not appear to be required for 4SRB stationary RICE < 5,000 hp. (See § 63.6615 and Table 3 to MACT ZZZZ.)

4. The Permittee shall comply with the monitoring, installation, collection, operation and maintenance requirements for stationary 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 C100, C200, C300, C400, C500 and BC100.

OBSERVATION: In accordance with § 63.6625(b)(3), the CPMS on the engines at the Coyote Wash Compressor Station collects catalyst inlet temperature readings at least once every 15 minutes. Pursuant to § 63.6625(b)(5), a CPMS performance evaluation must be conducted at least annually. According to information provided by MPLX in semi-annual compliance reports, CPMS performance evaluations were conducted October 16, 2019, and the week of October 12 – 16, 2020. According to information provided in the October 9, 2021, email from Mr. Gibbons, the performance evaluations included both the differential pressure transmitter and the catalyst inlet temperature thermocouple CPMS. In a notice dated August 19, 2021, MPLX stated that the next CPMS performance evaluations on C300, C400, and C500 were scheduled for the week of October 18-22, 2021. According to the notice, BC100, C100, and C200 are indefinitely shutdown and have not operated during the calendar year, so the October 2021 CPMS evaluation was not scheduled to include these engines.

5. The Permittee shall demonstrate initial compliance with the emission limitations, operating limitations and other requirements that apply to stationary 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 C100, C200, C300, C400, C500 and BC100.

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

Table 5: Results of MACT ZZZZ Performance Testing

Emission Unit	Test Date	Test Report Date	Avg. CO Reduction Efficiency	MACT ZZZZ CO Reduction Requirement	Average Load	Avg. Catalyst ΔP^* (inches H ₂ O)
C100	8/13/2019	9/26/2019	99.3%	93%	85%	1.8
C200	8/15/2019	9/26/2019	99.6%	93%	96%	1.9
C300	3/28/2019	5/28/2019	96.6%	93%	94%	3.5
C300	3/17/2020	5/14/2020	95.9%	93%	90%	4.5
C300	3/31/2021	5/5/2021	97.4%	93%	76%	3.6
C400	3/27/2019	5/28/2019	97.2%	93%	83%	0.9
C400	3/18/2020	5/14/2020	96.8%	93%	87%	2.5
C400	3/29/2021	5/5/2021	96.9%	93%	80%	1.6 (East Bank) 2.5 (West Bank)
C500	3/26/2019	5/28/2019	98.5%	93%	88%	4.7
C500	3/19/2020	5/14/2020	98.0%	93%	87%	5.3
C500	3/30/2021	5/5/2021	98.6%	93%	82%	5.2

* ΔP = differential pressure (pressure drop)

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 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 C100, C200, C300, C400, C500 and BC100.
2. The Permittee shall demonstrate continuous compliance with the emission limitations, operating limitations, and other requirements for stationary RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions, as specified in §§ 63.6640(a)-(e), for engines C100, C200, C300, C400, C500 and BC100.

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 - 1,350°F for engines C100, C200, C300, C400, and C500 and within 750 - 1,250°F for BC100. Differential pressure across the catalyst for all engines should be within 2 inches of water from the baseline established during the performance test (at 100% ± 10% load).

Mr. Gibbons provided inlet catalyst temperature data and monthly pressure drop readings for March 1, 2019 through September 1, 2019 to the EPA for review. All 4-hour average temperatures for C100 and C200 appeared to be within the compliant range. Excluding periods of non-operation, forty-four (44) 4-hour average temperatures for C300, forty-two (42) 4-hour average temperatures for C400 (East Bank), twenty-five (25) 4-hour average temperatures for C400 (West Bank), and forty-five (45) 4-hour average temperatures for C500 were out of the compliant temperature range. The majority of the out-of-range catalyst temperatures appear to be due to miscalculations of data, particularly during periods following engine startup, or due to bad temperature data/data errors. In the July 2018 inspection report for the Chapita Compressor Station, which is also operated by MPLX, the EPA previously noted concerns with the methodology used to compute catalyst inlet temperature 4-hour rolling averages, particularly related to calculations during periods where the engine has operated for less than four consecutive hours. The

EPA recommends that MPLX work on updating its system to correctly calculate averages following periods of engine downtime.⁷ Engine BC100 has not operated since July 12, 2017, so no data was provided for that engine. All monthly differential pressure readings reported appeared to be within 2 inches of the baseline differential pressure.

According to § 63.6640(b), performance tests must be conducted to re-establish operating parameters following each catalyst replacement, and the re-test must also demonstrate that the applicable emission limitation is being met. According to the information provided by Mr. Gibbons in the October 9, 2021, email submission, catalyst replacements and baseline performance tests on the engines at the Coyote Wash Compressor Station have been conducted, as indicated in Table 6, below. Data for BC100 was not provided, as it has not operated since July 2017.

Table 6: Engine Catalyst Replacements

Emission Unit	Catalyst Replacement Date	Date of Baseline Performance Test
C100	March 15, 2019	August 13, 2019
C200	July 15, 2019	August 15, 2019
C300	September 24, 2018	March 28, 2019
C400	N/A	November 28, 2012
C500	March 22, 2019	March 26, 2019
	March 25, 2021	March 30, 2021

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

1. The Permittee shall submit notifications as specified for stationary RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions in § 63.6645 for engines C100, C200, C300, C400, C500 and BC100.
2. The Permittee shall submit reports as specified for stationary 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 C100, C200, C300, C400, C500 and BC100. Reports of required performance tests shall be submitted with the respective semiannual report required in Section V.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 C100, C200, C300, C400, C500 and BC100.
4. The Permittee shall keep the records in the format and for the duration as specified in § 63.6660 for engines C100, C200, C300, C400, C500 and BC100.

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. See Table 5, p. 13, for MACT ZZZZ testing dates and corresponding report submission dates.

MPLX submitted the required semi-annual compliance reports for engines C100, C200, C300, C400, C500, and BC100. The reports contained details of any deviations from emissions and/or operating limitations and continuous reporting downtimes. See Table 7, below, for details of MACT

⁷ See *Implementation Question and Answer Document for National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines and New Source Performance Standards for Stationary Compression Ignition and Spark Ignition Internal Combustion Engines* (April 2, 2013). Guidance on calculating 4-hour average catalyst inlet temperatures is provided in the answer to Question #21 on p. 7 of the document.

ZZZZ reports submitted for the Coyote Wash Compressor Station for the period since the previous full compliance evaluation.

Table 7: MACT ZZZZ Semi-Annual Compliance Reports

Reporting Period	Report Date	Notes*
1/1/2019 – 6/30/2019	7/30/2019	• No APCD or process equipment malfunctions or CPMS out-of-control periods reported. • No CPMS or process changes reported. • 222.5 hours of CPMS downtime reported. • 204.5 total hours of deviations reported due to SCADA system outage as a result of storms
7/1/2019 – 12/31/2019	1/30/2020	• No APCD or process equipment malfunctions or CPMS out-of-control periods reported. • CPMS performance evaluation conducted on October 16, 2019. • No CPMS or process changes reported. • 4 hours of CPMS downtime reported. • 0.5 total hours of deviations reported due to SCADA data outage.
1/1/2020 – 6/30/2020	7/30/2020	• No APCD or process equipment malfunctions or CPMS out-of-control periods reported. • No CPMS or process changes reported. • 4.5 hours of CPMS downtime reported due SCADA data outage resulting in missing catalyst inlet temperature data on C300, C400, and C500. • No deviations reported. • During reporting period: C300 operated for 3,314.14 hours; C400 for 2,057.92 hours; C500 for 3,358.06 hours.
7/1/2020 – 12/31/2020	1/26/2021	• No APCD or process equipment malfunctions or CPMS out-of-control periods reported. • CPMS performance evaluation conducted the week of October 12-16, 2020. • No CPMS or process changes reported. • 339.5 hours of CPMS downtime reported. (3.5% of operating time for C300, 9.3% of operating time for C400, 3.4% of operating time for C500) • 331 total hours of deviations reported due to SCADA data outage. • During reporting period: C300 operated for 4,077.83 hours; C400 for 517.31 hours; C500 for 4,300.18 hours.
1/1/2021 – 6/30/2021	7/16/2021	• No APCD or process equipment malfunctions or CPMS out-of-control periods reported. • No CPMS or process changes reported. • 6.75 hours of CPMS inoperative periods reported due to missing data due to SCADA outages on C300, C400, and C500. • No deviations reported. • 6.75 hours of CPMS downtime reported. • During reporting period: C300 operated for 4,076.82 hours; C400 for 441.25 hours; C500 for 4,222.9 hours.

* APCD = Air Pollution Control Device; CPMS = Continuous Parametric Monitoring System

IV. 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 Coyote Wash that survive termination are found in paragraph 23.⁸

OBSERVATION: The Consent Decree was terminated on June 4, 2014. (See Appendix B 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 RICE

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

For RICE with a site rating of 500 hp or greater operated at the facility, identified as engines C100, C200, C300, C400, C500 and BC100, the Permittee shall comply with the requirements specified below:

(a) Emissions Control:

- (i)** The Permittee has installed and is operating a NSCR and AFR control device on each rich burn RICE. Emissions from Waukesha 7042GSI engine identified as BC100 in Table 2 of this permit shall not exceed 1.0 gram per horsepower hour (g/hp-hr) for nitrogen oxides (NO_x) and 1.0 g/hp-hr for carbon monoxide (CO); and
- (ii)** The Permittee has installed and is operating an oxidation catalyst control device on each lean burn RICE. The five existing lean burn RICE at Coyote Wash, identified as C100, C200, C300, C400 and C500 in Table 2, shall not exceed 1.0 gram per horsepower hour (g/hp-hr) for NO_x and 1.0 g/hp-hr for CO.

OBSERVATION: BC100 is equipped with an NSCR and AFR control device. Each lean burn RICE (C100, C200, C300, C400, and C500) is equipped with an oxidation catalyst that operates as a control device. Results of semi-annual performance tests for NO_x and CO conducted since the previous full compliance evaluation are displayed in Table 8 on p. 18.

(b) Emissions Controls Maintenance:

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

OBSERVATION: Per the consent decree, oxygen sensors are required for rich-burn engines with non-selective catalytic reduction (NSCR) and air-to-fuel ratio (AFR) controller systems. This requirement only applies to BC100. It does not apply to C100, C200, C300, C400, and C500 since they are lean-burn engines and, therefore, are not equipped with oxygen sensors. According to information provided during the March 2019 compliance evaluation, the oxygen sensor on BC100 was last replaced on August 8, 2016, which corresponded to 31,212 hours of engine run time. The engine has not operated since July 12, 2017.

⁸ 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.

(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 IV.B.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 RICE 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 V.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 RICE 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 Subpart ZZZZ. If the RICE load is increased by 20 % or greater averaged over a 30-day period commencing within 60 days of the last test, then the RICE 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; and
- (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.

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

Results of required semi-annual performance tests conducted at the Coyote Wash Compressor Station since the previous inspection are displayed in Table 8 on p. 18. Test results were submitted to the EPA in semi-annual reports, as required. BC100 has not operated since July 12, 2017, and therefore, has not been tested during the period covered by this full compliance evaluation. C100 and C200 were tested in August 2019, and then not tested again during the compliance period as C100 and C200 last operated September 21, 2019, and November 1, 2019, respectively.

Table 8: Results of Consent Decree Required Semi-Annual NO_x and CO Performance Testing

Emission Unit	Serial Number	Test Date	Avg. NO _x	NO _x Limit	Avg. CO	CO Limit	Avg. Engine Load	Avg. Catalyst Inlet Temp. (°F)	Avg. Catalyst ΔP* (inches H ₂ O)
			(g/hp-hr)		(g/hp-hr)				
C100	BEN00280	8/13/2019	0.459	1.0	0.013	1.0	85%	633	1.8
C200	BEN00281	8/15/2019	0.483	1.0	0.0087	1.0	96%	673	1.9
C300	BLB00311	3/28/2019	0.327	1.0	0.037	1.0	94%	688	3.5
C300	BLB00311	9/25/2019	0.424	1.0	0.0525	1.0	92%	719	4.4
C300	BLB00311	3/17/2020	0.53	1.0	0.07	1.0	90%	721	4.5
C300	BLB00311	11/9/2020	0.27	1.0	0.04	1.0	76%	727	3.8
C300	BLB00311	3/30/2021	0.28	1.0	0.04	1.0	76%	n.r.*	3.6
C400 ^a	4CG00082	3/27/2019	0.598	1.0	0.051	1.0	83%	762 (EB) 699 (WB)	0.9
C400 ^a	4CG00082	9/25/2019	0.592	1.0	0.0541	1.0	90%	762 (EB) 705 (WB)	1.7 (EB) 2.7 (WB)
C400 ^{a,b}	4CG00082	3/18/2020	0.65	1.0	0.06	1.0	87%	671 (Stack1) 723 (Stack 2)	2.5 (Stack 1) 1.3 (Stack 2)
C400 ^a	4CG00082	10/28/2020	0.38	1.0	0.04	1.0	81%	769 (EB) 705 (WB)	1.6 (EB) 2.5 (WB)
C400 ^a	4CG00082	3/29/2021	0.35	1.0	0.04	1.0	80%	738 (EB) 679 (WB)	1.6 (EB) 2.5 (WB)
C500	BLB0036	3/26/2019	0.285	1.0	0.02	1.0	88%	698	4.7
C500	BLB0036	9/26/2019	0.333	1.0	0.0401	1.0	93%	934	6.5
C500	BLB0036	3/19/2020	0.337	1.0	0.026	1.0	87%	714	5.3
C500	BLB0036	10/29/2020	0.26	1.0	0.03	1.0	82%	683	4.5
C500	BLB0036	3/30/2021	0.24	1.0	0.02	1.0	82%	683	5.2

* n.r. = not reported; ΔP = pressure drop

^a C400 has a dual exhaust stack; test results reported for each stack (EB = East exhaust bank; WB = West exhaust bank);

^b On the report for the 3/18/2020 test on C400, stacks were identified as Stack 1 and Stack 2; the EPA is unable to determine which corresponds to the East exhaust bank and the West exhaust bank.

[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 C100, C200, C300, C400 and C500 do not use oxygen sensors. Requirement for RICE section 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.]

V. 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 HAP is not subject to a relevant standard or other requirement established under 40 CFR part 63, the Permittee shall keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination shall

include an analysis (or other information) that demonstrates why the Permittee believes the source is unaffected (e.g., because the source is an area source). [40 CFR 63.10(b)(3)]

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

OBSERVATION: Per Mr. Gibbons, no off-permit changes have been conducted at the Coyote Wash Compressor Station during the evaluation period covered by this inspection report (March 2019 to present).

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. The report shall be submitted semi-annually, by January 31st and July 31st of each year. The report due on January 31st shall cover the 6-month period ending on the last day of December before the report is due. The report due on July 31st shall cover the 6-month period ending on the last day of June before the report is due. All instances of deviations from permit requirements shall be clearly identified in such reports. All required reports shall be certified by a responsible official consistent with the Submissions section of this permit.

OBSERVATION: See Table 9, p. 20 for details of semi-annual (SIXMON) reports that have been submitted to the EPA for the Coyote Wash Compressor Station since the previous full compliance evaluation.

Table 9: Title V Semi-Annual (SIXMON) Reports for Coyote Wash Compressor Station

Reporting Period	Report Date	Received Date	Notes
1/1/2019 – 6/30/2019	7/30/2019	7/31/2019	- Annual MACT ZZZZ performance testing was conducted in March 2019 on C300, C400, and C500. C100 and C200 were not available for testing due to issues upstream of station; will be tested in August 2019. - NSPS JJJJ testing conducted for C500 on 3/26/19. - CD/permit testing for NO_x and CO conducted for C300, C400, and C500 in March 2019. C100, C200, and BC100 not tested because non-operational. - Reported 52.5, 86.0, and 33.0 hours of deviations on C200, C300, and C400, respectively, due to SCADA system issues.
7/1/2019 – 12/31/2019	1/30/2020	2/5/2020	- Reported that MACT ZZZZ CPMS monitoring was conducted per § 63.6625 and § 63.6635. - MACT ZZZZ annual testing conducted on C100 and C200 in August 2019. BC100 not tested because last operated 7/12/2017. - NSPS JJJJ testing conducted on C500 in previous reporting period. - Semi-annual NO_x and CO testing conducted on C100 and C200 in August 2019 and on C300, C400, and C500 in September 2019. BC100 not tested because not operational. - Reported 0.25 hours of deviations on C300 and C500 due to data communications loss.
1/1/2020 – 6/30/2020	7/30/2020	7/30/2020	- Reported that MACT ZZZZ CPMS monitoring was conducted per § 63.6625 and § 63.6635. - MACT ZZZZ annual testing conducted on C300, C400, and C500 in March 2020. BC100, C100, and C200 not tested because did not operate. - NSPS JJJJ testing conducted on C500 on 3/19/2020. - Semi-annual NO_x and CO testing conducted on C300, C400, and C500 in March 2020. BC100, C100, and C200 not tested because did not operate. - Reported no deviations during reporting period.
7/1/2020 – 12/31/2020	1/26/2021	1/26/2021	- Reported that MACT ZZZZ CPMS monitoring was conducted per § 63.6625 and § 63.6635. - No MACT ZZZZ testing conducted during reporting period. BC100, C100, and C200 did not operate during reporting period. - NSPS JJJJ testing conducted on C500 on 3/19/2020. - Semi-annual NO_x and CO testing conducted on C300 in November 2020 and on C400, and C500 in October 2020. BC100, C100, and C200 not tested because did not operate. - Reported 331 hours of deviations for missing data due to SCADA outage in September 2020 (141.5 hours on C300 and C500, 48 hours on C400)
1/1/2021 – 6/30/2021	7/16/2021	7/16/2021	- Reported that NSPS JJJJ testing conducted on C500 on 3/30/2021. - Reported that MACT ZZZZ CPMS monitoring was conducted per § 63.6625 and § 63.6635 (BC100, C100, C200, C300, C400, C500). - Reported that annual MACT ZZZZ testing was conducted on C300, C400, and C500 in March 2021. BC100, C100, and C200 were not tested as they have not operated since 7/12/2017, 9/21/2019, and 11/1/2019, respectively. - Reported that semi-annual NO_x and CO testing was conducted on C300, C400, and C500 in March 2021. BC100, C100, and C200 not tested since non-operational. - No deviations reported.

2. “Deviation” means any situation in which an emissions unit fails to meet a permit term or condition. A deviation is not always a violation. A deviation can be determined by observation or through review of data obtained from any testing, monitoring, or recordkeeping established in accordance with § 71.6(a)(3)(i) and (a)(3)(ii). For a situation lasting more than 24 hours which constitutes a deviation, each 24-hour period is considered a separate deviation. Included in the meaning of deviation are any of the following:
- (a) A situation where emissions exceed an emission limitation or standard;
 - (b) A situation where process or emissions control device parameter values indicate that an emission limitation or standard has not been met; or
 - (c) A situation in which observations or data collected demonstrate noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit.
3. The Permittee shall promptly report to the EPA deviations from permit requirements, including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. “Prompt” is defined as follows:
- (a) Any definition of “prompt” or a specific time frame for reporting deviations provided in an underlying applicable requirement as identified in this permit.
 - (b) Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations will be submitted based on the following schedule:
 - (i) For emissions of a HAP or a toxic air pollutant (as identified in the applicable regulation) that continue for more than an hour in excess of permit requirements, the report shall be made within 24 hours of the occurrence.
 - (ii) For emissions of any regulated air pollutant, excluding a HAP or a toxic air pollutant that continues for more than 2 hours in excess of permit requirements, the report shall be made within 48 hours.
 - (iii) For all other deviations from permit requirements, the report shall be submitted with the semi-annual monitoring report.
 - (c) If any of the conditions in (i) or (ii) of paragraph (b) above are met, the Permittee shall notify the EPA by telephone (1-800-227-6312), facsimile (303-312-6409), or by email to r8airreportenforcement@epa.gov based on the timetables listed above. *[Notification shall specify that this notification is a deviation report for a Part 71 permit]*. A written notice, certified consistent with the Submissions section of this permit shall be submitted within ten working days of the occurrence. All deviations reported under this section shall also be identified in the 6-month report required under Condition 1 in this section of this permit.

OBSERVATION: See Table 9, p. 20, for deviations reported in semi-annual reports during the period covered by this full compliance evaluation.

VI. General Provisions

A. Annual Fee Payment [40 CFR § 71.9]

1. The Permittee shall pay an annual permit fee in accordance with the procedures outlined below.
2. The Permittee shall pay the annual permit fee each year no later than April 1st. The fee shall cover the previous calendar year.

OBSERVATION: Annual fees received for the Coyote Wash Compressor Station for the 2019 and 2020 reporting years are displayed in Table 10, below.

Table 10: Annual Fees Received for the Coyote Wash Compressor Station

Date Received	Reporting Year	Fee Paid
March 26, 2020	2019	\$4,627.66
March 30, 2021	2020	\$4,815.72

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.

OBSERVATION: Annual emissions reports received by the EPA for the Coyote Wash Compressor Station are displayed in Table 11, below. Reports for calendar years 2019 and 2020 were received on March 26, 2020, and March 30, 2021, respectively.

Table 11: Annual Emissions Reported for the Coyote Wash Compressor Station

Pollutant	Actual Emissions (tpy)	
	2019	2020
NO _x	35.5	38.0
VOC	47.6	47.0
SO ₂	0.1	0.2
PM ₁₀	2.8	3.0
Lead	0.0	0.0
Total HAPs	9.8	11.1

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]

3. Compliance Certifications [40 § CFR 71.6(c)(5)]
 - (a) The Permittee shall submit to the EPA a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices annually by April 1st, and shall cover the same 12-month period as the two consecutive semi-annual monitoring reports.

OBSERVATION: Title V Annual Compliance Certifications (TVACCs) submitted since the previous inspection are shown in Table 12, p. 23.

Table 12: Facility-Wide Annual Compliance Certifications (TVACCs)

Reporting Period	Report Date	Date Received	Notes
1/1/2019 – 12/31/2019	1/30/2020	2/5/2020	• MACT ZZZZ: Testing conducted on C100 and C200 in August 2019. Testing conducted on C300, C400, and C500 in March 2019. BC100 was not tested because the engine was not operating. • NSPS JJJJ: Reported that C500 was tested on 3/26/2019, which was 5,898 runtime hours after the previous test (conducted 9/14/2017). • Permit testing requirements: Semiannual performance testing not conducted on BC100 as it did not operate in 2019. C100 and C200 were not tested in the first half of 2019 due to intermittent operation; both engines tested in second half of 2019. • Reported continuous compliance with all other permit requirements. • 172 hours of deviations reported, 171.5 hours because of bad catalyst inlet temperature data due to data loss during thunderstorm (52.5 hours on C200, 86 hours on C300, 33 hours on C400); 0.5 hours due of bad catalyst inlet temperature data due to non-storm-attributed data loss (0.25 hours on C300 and 0.25 hours on C500)
1/1/2020 – 12/31/2020	1/26/2021	1/26/2021	• MACT ZZZZ: C100, C200, and BC100 not tested as they did not operate in 2020. C300 tested 3/17/2020, C400 tested 3/18/2020, C500 tested 3/19/2020. Deviations reported on engines C300, C400, and C500. • NSPS JJJJ: C500 tested on 3/19/2020, which was X hours after the previous test (conducted 3/26/2019). • Permit testing requirements: C300 tested 11/9/2020, C400 tested 10/28/2020, C500 tested 10/29/2020. C100, C200, and BC100 not tested because non-operational in 2020. • Reported continuous compliance with all other permit requirements. • 331 hours of deviations reported for missing data due SCADA data outage (141.5 hours on C300 and C500, 48 hours on C400)

APPENDIX A: Site Overview



Figure 1: Coyote Wash Compressor Station Aerial View

APPENDIX B: 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.

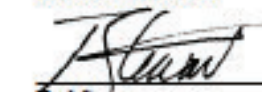
Case No. 2:08-CV-167 TS
District Judge Ted Stewart

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