

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

Inspection Date:	September 17, 2024
Inspection Report Date:	October 1, 2024
EPA Representatives:	Colin LeCortz, Environmental Scientist, US EPA Region 8 Mike Stovern, Environmental Scientist, US EPA Region 8 Chris Andrade, US EPA Region 8 James Floyd, US EPA Region 8
Tribal Representatives:	Lonnie Favel Alverna Nelson
Company Representatives:	Joshua Hirschi AJ Thompson Jared Holmes Bill Allen Joe Lopez Chris Calvert David VanLeuben
Inspection Report Prepared By:	Colin LeCortz, Environmental Scientist, US EPA Region 8
Inspection Report Reviewed By:	Scott Patefield, Manager, Enforcement and Compliance Assurance Division, Air and Toxics Enforcement Branch SCOTT PATEFIELD
Last Inspection:	September 2, 2021
Operating Status:	Operating
Applicable Requirements:	40 CFR Part 60, Subpart JJJJ: Standards of Performance for New Stationary Spark Ignition Internal Combustion Engines (NSPS JJJJ) 40 CFR Part 63, Subpart ZZZZ: National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (MACT ZZZZ) Requirements of Consent Decree Case No. 2:08-CV-00167-TS- PMV Requirements of Consent Decree Civil Action No. 2:23cv252 40 CFR Part 71: Federal Operating Permit Programs

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Permit Number: V-UO-000015-2018.01
Replaces Permit No.: V-UO-000015-2018.00

Issue Date: November 22, 2021
Effective Date: November 22, 2021
Expiration Date: June 12, 2025

Facility Information and Emission Unit Identification

Parent Company Name: MPLX
Mailing Address: 1515 Arapahoe Street, Suite 1600, Denver, Colorado 80202
Facility Contact: Joshua Hirschi, Environmental Engineer
(435) 781-7489
Facility Operator & Name: MPLX – Coyote Wash Compressor Station (Coyote Wash)
Facility Location: Latitude 40.038379, Longitude -109.441328
County, State: Uintah Count, Utah
Reservation: Uintah and Ouray Indian Reservation
Tribe: Ute Indian Tribe
Responsible Official: James O. Wakeley, Operations Senior Director
SIC Code: 1311 – Crude Petroleum and Natural Gas
AFS ID: 49-047-00107
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 (See Case No. 2:08-CV-00167-TS-PMW, not attached) 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; however, several requirements survive termination of the decree. (See Section IV of this report.)

MPLX entered into a Consent Decree with the United States (See Civil Action No. 2:23cv252, not attached) effective July 21, 2023, to resolve alleged violations of MACT ZZZZ at the Coyote Wash Compressor Station. The Consent Decree includes alleged violations of both MACT ZZZZ and separate regulations at multiple compressor stations and gas plants. MPLX was ordered to pay civil penalties totaling \$2,000,000 plus interest, as follows: (i) \$1,558,100 to the United States; (ii) \$325,200 to the State of North Dakota; (iii) \$116,700 to the State of Wyoming. See Section IV of this report for provisions of the Civil Action that were evaluated for compliance during the inspection.

Inspection Findings/Areas of Concern

1. EPA strongly advises MPLX to ensure contractors are using vehicles that have not had emission controls tampering. Fleet vehicles are required to operate original equipment manufacturer factory emission controls. Contractors also have to comply with tribal access permit requirements where necessary. See General Inspection Observations and Commentary, point 7. below for more information.
2. EPA advised MPLX to consider back pressure regulators on ECD's to allow for more complete combustion of emissions being routed to a control device.
3. A leaking fuel gas regulator associated with C-400, engine was not operating, was found during the inspection. EPA inspectors saw emissions via FLIR from C-400's west exhaust stack. MPLX turned off the gas to the regulator which, according to MPLX, decreased the flow of emissions venting to atmosphere. MPLX suggested that they will replace the regulator to allow for a complete fix of the leaking fuel gas.

Compliance Assistance

A copy of this report, which highlights EPA's areas of concern, was provided to MPLX upon finalization.

Description of Operations²

Coyote Wash gathers natural gas and natural gas condensate from surrounding well sites via a gathering pipeline system. The natural gas and condensate undergo a natural separation process in the inlet separator that separates the natural gas from the entrained liquids. The condensate is routed to the flash tank separator. Flash emissions from the flash tank separator are captured by a vapor recovery unit (VRU). The vapors from the VRU are compressed by an electric compressor and routed to the facility's gas inlet. Vapors from the flash tank separator are routed to a combustor (Emissions Unit C-1 in Table 1 below), via a slop tank, when the VRU and electric compressors are not operating. Condensate from the flash tank separator is pumped offsite to a gas plant. The produced water from the flash tank separator is routed to a 300 barrel slop tank (Emissions Unit T-7 in Table 1 below). Produced water is transported off site by tanker trucks. Natural gas from the inlet separator is routed to six reciprocating internal combustion engines (RICE) (Emissions Units C100, C200, C300, C400, C500 and BC100 in Table 1 below) where it is compressed from field pressure to approximately 1,000 pounds per square inch gauge (psig). The compressed natural gas is then routed to the sales gas pipeline. There are fugitive emissions associated with the potential seeping of natural gas from connections, seals, flanges and valves. Instrument air is utilized on site for energizing pneumatic equipment.

General Inspection Observations and Commentary

EPA inspectors, and tribal representatives met with MPLX representatives at Coyote Wash Compressor Station (Coyote Wash) operated by MPLX at 10:23 AM on September 17, 2024. A Job Safety Analysis was conducted by MPLX representatives, and MPLX was informed that EPA inspectors would be using an intrinsically safe forward looking infrared (FLIR) camera. A hot work permit was required.

MPLX representatives discussed the following throughputs at the time of the inspection:

1. Natural gas throughput at time of inspection: 25 MMscf/d
2. Exit pressure of natural gas is 1000+ psi.
3. Suction pressure of natural gas at the inlet: 140 psi.

The following observations were taken during the facility walkthrough:

1. Condensate drops out of the three-phase separator where it is later injected back into the pipeline and is routed to Ironhorse Gas Plant.
2. BC100 does not route natural gas to Ironhorse Gas Plant, but instead routes natural gas/residue gas to the Wyoming Interstate Company Pipeline where necessary.
3. No engine modifications or new equipment has been installed since the previous inspection. However, the compressor associated with C-300 was being upgraded to allow for increased pressures at the time of inspection. C-300 was not operating.
4. The ECD controlling emissions from the storage vessels was operating, confirmed by presence of a heat signature on the IR camera, but MPLX representatives confirmed that no backpressure regulator was present. EPA advised MPLX that the use of a backpressure regulator allows for a more complete destruction of emissions routed to the unit (not a permit requirement).
5. No tanks were venting emissions when viewed with the FLIR camera.
6. EPA confirmed that the serial numbers and manufacture dates of the engines onsite matched the permit. BC100 was reconstructed and now has a manufacture date of August 2023.
7. During the onsite inspection, MPLX was upgrading the compressor associated with engine C-300. An MPLX contractor, Weldco Industrial, driving a diesel Ram 5500 truck with Texas plates was found to have the emissions controls deleted and a straight pipe in the place of the emission controls post combustion (particulate filter and selective catalytic reduction). This is being included in the full compliance evaluation for Coyote Wash for informational purposes. EPA took photos of the vehicle and

² The description of operations provided here is a modified excerpt from the process description from the Title V Permit, V-UO-000015-2018.01.

defeated emission controls (straight pipe and removed sensors), see Appendix B, Photo Log. In a response provided September 24, 2024, MPLX representatives stated that the project manager notified the driver that the truck was no longer allowed on MPLX facilities until the emissions components are repaired.

8. A leaking fuel gas regulator associated with C-400, engine was not operating, was found during the inspection. EPA inspectors saw emissions via FLIR from C-400's west exhaust stack. MPLX turned off the gas to the regulator which, according to MPLX, decreased the flow of emissions venting to atmosphere. MPLX suggested that they will replace the regulator to allow for a complete fix of the leaking fuel gas. When MPLX turned the fuel gas line off this also affected fuel flow to C-500, which was operating. The unstable fuel flow triggered an engine shutdown for C-500 and subsequent line pressure blowdown. Tribal representatives took a FLIR video (See Appendix B) of the blowdown as it was occurring. In a response provided September 24, 2024, MPLX representatives stated that they were "able to close off the main fuel gas which shut the fuel gas off to the unit and stopped the leak coming out the exhaust. On 9/19/24 the ASCO fuel valve was replaced and then the mechanic turned the fuel gas back on to verify that the fuel pressure on the engine fuel rail showed 0 psi (indicating no pressure where there shouldn't be pressure). The repair was verified by our LDAR technician (Bill) using his OGI camera on the same day (9/19/24) as being repaired."

EPA and MPLX representative met for a closing conference. A confidential business information (CBI) warning was presented to MPLX representatives, and no CBI was claimed. During the on-site closing conference, EPA inspectors discussed emissions from C-400 and the contractor vehicle that had emission controls removed that were discovered by EPA inspectors onsite.

EPA staff departed the facility at 12:07 PM. An email to request relevant compliance-related information and records was sent to MPLX representatives prior to the onsite inspection and MPLX provided the requested information to EPA via email on September 24, 2024 and September 30, 2024.

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.

Table 1. Emission Units and Emission Generating Activities

Unit I.D.	Description (acronyms defined below table)	Control Equipment
C100	Caterpillar G3608LE; 2,146 hp 4-Stroke Lean-Burn (4SLB) RICE Natural Gas-Fired Serial No. BEN00280 Installed: 9/2005 Manufactured: 6/15/2005	SCO
C200	Serial No. BEN00281 Installed: 9/2005 Manufactured: 7/14/2005 EPA inspectors confirmed the serial numbers and engine information matched C100 and C200 as permitted during the onsite inspection.	
C300	Caterpillar G3616LE; 4,588 hp 4SLB RICE Natural Gas-Fired Serial No. BLB00311 Installed: 4/2007 Manufactured: 6/16/2006	SCO
C400	Serial No. 4CG00082 Installed: 9/2007 Manufactured: 3/21/2007	
C500	Serial No. BLB00386 Installed: 7/2008 Manufactured: 9/27/2007 EPA inspectors confirmed the serial numbers and engine information matched C300, C400 and C500 as permitted during the onsite inspection.	
BC100	Waukesha 7042GSI, Booster Compressor; 1,480 hp 4-Stroke Rich-Burn (4SRB) RICE Natural Gas-Fired Serial No. 387747 Installed: 3/1/2006 Manufactured: 1985 OBSERVATION: reconstructed August 2023, new serial number appears to be WAU-1695357 but was difficult to see during the inspection. Manufactured Date August 2023. Operating hours: 810	AFRC and NSCR
T-3 T-4 T-5 T-6	Miscellaneous Chemical Storage Tanks 100 bbl Ethylene Glycol 100 bbl Lube Oil 100 bbl Used Oil 100 bbl Used Ethylene Glycol	None (IEU)
T-7	300 bbl Slop Tank	Combustor (C-1) (IEU)
EL	Equipment Leaks	None

Unit I.D.	Description (acronyms defined below table)	Control Equipment
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 is a Control Device
G-1	Ford WSG1068 Emergency Generator; 197 hp 4SRB RICE Natural Gas-Fired Serial No. 06PS62586 Installed: 11/2006 Manufactured: 11/2006	None (IEU)

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

Potential to Emit (PTE)

Pursuant to 40 CFR 52.21, potential to emit (PTE) is defined as the maximum capacity of a stationary source to emit a pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored or processed, shall be treated as part of its design if the limitation, or the effect it would have on emissions, is federally enforceable. Independently enforceable applicable requirements are considered enforceable to the extent that the source is in compliance with the standard. In addition, beneficial reductions in non-targeted pollutants resulting from compliance with an independently enforceable applicable requirement may be counted towards PTE provided the emission reduction of the non-targeted pollutant is enforceable as a practical matter and compliance is being met. See the 1995 guidance memo signed by John Seitz, Director of the Office of Air Quality Planning and Standards titled, "Options for Limiting Potential to Emit of a Stationary Source under section 112 and Title V of the Clean Air Act (CAA)."

MPLX reported the controlled and uncontrolled emission unit-specific PTE in their Part 71 permit renewal application which are shown in Tables 2 and 3. The controlled emissions in Table 3 are based on the legally and practically enforceable requirements set forth in this proposed permit, including a federal Consent Decree (see Section II.O. below).

Table 2 – Potential-to-Emit Without Legally and Practicably Enforceable Controls

Regulated Air Pollutants (tpy)								
Unit I.D.*	NO _x	CO	VOC	PM	SO ₂	CH ₂ O	Total HAPs	CO _{2e}
C100	20.72	51.81	35.14	0.70	0.04	8.29	9.57	8,245
C200	20.72	51.81	35.14	0.70	0.04	8.29	9.57	8,245
C300	44.30	110.31	40.14	1.51	0.09	11.52	14.26	17,660

C400	44.30	110.31	40.14	1.51	0.09	11.52	14.26	17,660
C500	44.30	110.76	40.14	1.51	0.09	11.52	14.26	17,660
BC100	185.78	128.62	5.31	1.09	0.03	0.71	1.32	6,589
T-3 – T-7	-	-	0.38	-	-	-	0.04	<1.0
C-1	0.01	0.003	-	-	-	-	-	9
EL	-	-	5.46	-	-	-	0.33	323
ES	-	-	0.37	-	-	-	0.01	37
CB	-	-	11.03	-	-	-	0.31	1,116
ESD	-	-	0.32	-	-	-	0.009	9
PG	-	-	0.27	-	-	-	0.008	16
G-1	1.19	1.997	0.02	0.01	-	0.01	0.017	-
Total	361.33	565.61	213.84	7.03	0.38	51.86	63.98	77,570

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

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

Regulated Air Pollutants (tpy)							
Unit I.D.	NO_x	CO	VOC	PM	SO₂	CH₂O	CO₂e
C100 ^b	20.72	20.72	17.57	0.70	0.04	2.07	8,245
C200 ^b	20.72	20.72	17.57	0.70	0.04	2.07	8,245
C300 ^b	44.30	44.30	20.07	1.51	0.09	3.99	17,660
C400 ^b	44.30	44.30	20.07	1.51	0.09	3.99	17,660
C500 ^b	44.30	44.30	20.07 ^a	1.51	0.09	3.99	17,660
BC100 ^b	14.29	14.29	2.65	1.09	0.03	0.17	6,589
T-3 – T-7	-	-	0.38	-	-	-	<1.0
C-1	0.01	-	-	-	-	-	9
EL	-	-	5.46	-	-	-	323
ES	-	-	0.37	-	-	-	37
CB	-	-	11.03	-	-	-	1,116
ESD	-	-	0.32	-	-	-	9
PG	-	-	0.27	-	-	-	16
G-1	1.19	1.997	0.02	0.01	-	0.01	-
Total	188.84	190.64	115.84	7.03	0.38	16.29	77,570

a. Based on the enforceable emission limit of 1.0 g/hp-hr limit of VOC in the Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (40 CFR part 60, subpart JJJJ (Subpart JJJJ)), C500 is subject to Subpart

JJJJ.

b. Emissions Units C100, C200, C300, C400, C500, and BC100 are subject to emissions limits as specified in the Consent Decree Case No. 2:08-CV-00167-TS-PMV and Civil Action No. 2:23cv252.

Table 4: 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 $\geq 93\%$	Oxidation Catalyst	Performance test	Semi-Annual ^a
		Maintain catalyst inlet temperature between 450 – 1,350 °F		CPMS ^b : Catalyst Inlet Temp. and ΔP	Continuous
		Maintain pressure drop (ΔP) across catalyst to within ± 2 inches of the baseline		Record Temp.	Every 15 minutes; calculate 4-hour averages
				Record ΔP	Monthly
	Both Consent Decree's (CD)	NOX = 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 $\geq 93\%$	O ₂ Catalyst	Performance test	Semi-Annual ^a
		Maintain catalyst inlet temperature between 450 – 1,350 °F		CPMS ^b : Catalyst Inlet Temp. and ΔP	Continuous
		Maintain pressure drop (ΔP) across catalyst to within ± 2 inches of the baseline		Record Temp.	Every 15 minutes; calculate 4-hour averages
				Record ΔP	Monthly
	NSPS JJJJ	NOX = 3.0 g/hp-hr or 250 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
	Both Consent Decree's (CD)	NOX = 1.0 g/hp-hr CO = 1.0 g/hp-hr		Performance test	Semi-Annual ^a
	NSPS JJJJ	NOX = 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

		Reduce formaldehyde emissions by $\geq 76\%$		Performance test	Initial and following catalyst changeout
BC100 1,478 hp 4SRB Waukesha 7042GSI	MACT ZZZZ	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	CPMS ^b : Catalyst Inlet Temp. and ΔP	Continuous
				Record Temp.	Every 15 minutes; calculate 4-hour averages
				Record ΔP	Monthly
	Both Consent Decree's (CD)	NOX = 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	Semi-Annual ^a
				Monitor hours of operation with non- resettable hour meter	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.

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

A. **Applicability** [40 CFR 60.4230]

- 40 CFR part 60, subpart JJJJ (Subpart JJJJ) applies to the following emission unit:
 - Caterpillar G3616LE 4SLB RICE identified as C500 in Table 2 of this permit.
- 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 ≥ 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.

According to a Title V minor permit modification request submitted by MPLX on February 13, 2024, engine BC100 was recently modified and reconstructed, therefore BC100 has triggered applicability to NSPS JJJJ as specified in 40 CFR 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 § 60.4:

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).

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

1. The Permittee shall comply with the emissions standards for non-emergency, spark ignition (SI) internal combustion engines (ICE) greater than 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 5 below for results of NSPS JJJJ performance tests that have been conducted on engine C500 since the previous compliance evaluation.

OBSERVATION: According to a Title V minor permit modification request submitted by MPLX on February 13, 2024, engine BC100 was recently modified and reconstructed, therefore BC100 has triggered applicability to NSPS JJJJ as a reconstructed SI ICE. As specified in 40 CFR 60.4233(f)(4)(i):

Owners and operators of stationary SI natural gas and lean burn LPG engines with a maximum engine power greater than 19 KW (25 HP), that are modified or reconstructed after

June 12, 2006, must comply with the same emission standards as those specified in paragraph (d) or (e) of this section, except that such owners and operators of non-emergency engines and emergency engines greater than or equal to 130 HP must meet a nitrogen oxides (NOX) emission standard of 3.0 grams per HP-hour (g/HP-hr), a CO emission standard of 4.0 g/HP-hr (5.0 g/HP-hr for non-emergency engines less than 100 HP), and a volatile organic compounds (VOC) emission standard of 1.0 g/HP-hr, or a NOX emission standard of 250 ppmvd at 15 percent oxygen (O₂), a CO emission standard 540 ppmvd at 15 percent O₂ (675 ppmvd at 15 percent O₂ for non-emergency engines less than 100 HP), and a VOC emission standard of 86 ppmvd at 15 percent O₂, where the date of manufacture of the engine is: Prior to July 1, 2007, for non-emergency engines with a maximum engine power greater than or equal to 500 HP

MPLX listed an emission standard in the February 13, 2024, stating that BC100 complies with Table 1 of NSPS JJJJ pursuant to § 60.4233(e). However, due to enforceable emission limitations as specified in both Case No. 2:08-CV-00167-TS-PMW and Civil Action No. 2:23cv252, BC100 shall comply with an emission limit of a NOX limit of 1.0 g/HP-hr, and a CO emission standard of 1.0 g/HP-hr. Therefore, EPA recommends that MPLX adjust the applicability of reconstructed engines pursuant to 40 CFR 60.4233(f)(4)(i) in the Title V Minor Modification Application and that the EPA make a Note to Permittee explaining enforceable limits in the Title V renewal permit as specified in both Case No. 2:08-CV-00167-TS-PMW and Civil Action No. 2:23cv252.

See Table 5 below for results of NSPS JJJJ performance tests that have been conducted on engine BC100 or C500 since the previous compliance evaluation.

B. 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 and BC100 are non-certified engines and therefore, C500 must comply with § 60.4243(b)(2).

BC100 shall comply with § 60.4243(b)(2) pursuant to 40 CFR 60.4243(c) because the engine was reconstructed:

If you are an owner or operator of a stationary SI internal combustion engine that must comply with the emission standards specified in § 60.4233(f), you must demonstrate compliance according paragraph (b)(2)(i) or (ii) of this section, except that if you comply according to paragraph (b)(2)(i) of this section, you demonstrate that your non-certified engine complies with the emission standards specified in § 60.4233(f).

Pursuant to § 60.4243(b)(2)(ii), MPLX must keep a maintenance plan and records of conducted maintenance on C500 and BC100 and must operate the engine in a manner consistent with good air pollution control practices. MPLX provided maintenance records for C500 and BC100 to the EPA upon request. See Table 5., below, for engine C500 and BC100 performance test information.

C. 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 5, below, for results. Additionally, MPLX provided notice of performance tests 30 days prior as required by 60.8(d), as incorporated by reference pursuant to § 60.4244(a). MPLX provided NSPS

JJJJ performance tests for C300 and C400 which were not evaluated during this inspection because C300 and C400 do not appear to be subject to NSPS JJJJ.

Table 5: Results of NSPS JJJJ Performance Testing (NO_x, CO, VOC)

Emission Unit ID	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	3/8/2022	5/4/2022	0.44	2.0	0.03	4.0	0.07	1.0	80%	n.r.
C500	5/3/2023	6/7/2023	0.46	2.0	0.06	4.0	0.1	1.0	88%	95766
C500	11/8/2023	11/20/2023	0.38	2.0	0.02	4.0	0.03	1.0	88%	167*
BC100	3/12/2024	3/27/2024	0.05	3.0	0.03	4.0	0.02	1.0	75.3%	667
C500	5/7/2024	NA	0.57	2.0	0.02	4.0	0.03	1.0	85%	3806

* According to information provided by MPLX, the engine runtime changed due to the hours rolling over after passing 100,000 hours.

Note: NO_x, CO and VOC limits for C500 and BC100 are listed above for applicability to NSPS JJJJ for informative purposes only. The enforceable limitations provided in the consent decree's are lower than NSPS JJJJ for NO_x and CO.

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

The Permittee shall comply with all of the applicable notification, reporting, and recordkeeping requirements for non-emergency SI ICE greater than 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 performance tests in Table 5 above were submitted within the required 60-day timeline.

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

A. Applicability [40 CFR 63.6585]

1. 40 CFR part 63, subpart ZZZZ (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). MPLX confirmed that C100 and C200 last operated in 2019.

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). According to a Title V minor permit modification request submitted by MPLX on February 13, 2024, engine BC100 was recently modified and reconstructed, however the MACT ZZZZ regulatory limits or applicability for 4SRB, SI, natural gas-fired engine with greater than 500 hp located at a major source of HAP do not change based on the construction or reconstruction date.

Emergency generator (G-1) is a stationary RICE with less than or equal to 500 hp. According to information submitted during the previous inspection, the generator was constructed in November 2006. 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.

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.

B. General Provisions [40 CFR 63.6665]

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

Branch Chief, Air 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 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).

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 6, below, 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, MPLX provided catalyst temperature data and monthly pressure drop readings covering the period of January 1, 2022 through the date of inspection, 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 during the previous compliance evaluation, confirmed during the onsite inspection and via MACT ZZZZ report and Title V reports, 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 6, below, for results of MACT ZZZZ performance tests conducted since the previous full compliance evaluation.

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 and via email notification, CPMS performance evaluations were conducted October, 2021, October, 2022, October 2023 and will be conducted on all four engines at Coyote Wash between October 14-18, 2024.

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 6: Results of MACT ZZZZ Performance Testing

Unit ID	Test Date	CO reduction %	CO % reduction	Avg. Δ P (inches H ₂ O)	Average Load (% Site Rating)
C300	3/8/2022	93%	97.60	3.9	75.7
C400 (East and West Bank)	3/9/2022	93%	95.10	3.6	80
C500	3/8/2022	93%	98.50	5.2	80
C300	12/1/2022	93%	NA	5.1	90.7
C400 (East and West Bank)	10/27/2022	93%	98.10	5.2 (E) 1.7 (W)	79.7
C500	10/26/2022	93%	98.50	4.6	78
C300	1/9/2023	93%	97.00	5.2	86
C300	5/1/2023	93%	96.50	5.7	85
C400 (East and West Bank)	5/2/2023	93%	96.20	1.6(E) and 1.6(W)	95
C500	5/3/2023	93%	96.90	6.2	88
C300	10/19/2023	93%	96.30	5.2	89
C400 (East and West Bank)	10/19/2023	93%	96.20	1.6(E) and 2.0(W)	94
C500	11/8/2023	93%	97.90	6	88.3
BC100	3/12/2024	93%	100	3.5	75.3
C500	5/7/2024	93%	98	6.0	85.0
C400 (East and West Bank)	5/13/2024	93%	96.6	1.4(E) and 1.7(W)	88
C300	5/7/2024	93%	97.7	5.2	80.0

* 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).

MPLX provided inlet catalyst temperature data and monthly pressure drop readings for January 1, 2022 through the date of the inspection to the EPA for review. All 4-hour average temperatures appeared to be within the compliant range.

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 MPLX on September 30, 2024, catalyst replacements and baseline performance tests on the engines at the Coyote Wash Compressor Station have been conducted, as indicated in Table 7, below.

Table 7: Engine Catalyst Replacements

Emission Unit	Catalyst Replacement Date	Date of Baseline Performance Test
BC100	3/7/2024	3/12/2024
C300	1/4/2024	1/9/2024
C400	10/26/2022	10/27/2022
C500	11/7/2023	11/8/2023

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 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. MPLX complied with the provision to provide inspection reports within 60 days of completion of the test. Additionally, MPLX complied with the provision pursuant to § 63.6645(g) to submit Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin.

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 8, below, for details of MACT ZZZZ reports submitted for the Coyote Wash Compressor Station for the period since the previous full compliance evaluation.

Table 8: MACT ZZZZ Semi-Annual Compliance Reports

Reporting Period	Report Date	Notes*
7/1/2021 – 12/31/2021	1/31/2022	- No APCD or process equipment malfunctions or CPMS out-of-control periods reported. - No CPMS or process changes reported. 10.5 hrs of CPMS inoperative periods reported due to failed sensors or lost communications. - No deviations reported. - CPMS performance evaluation conducted the week of October 19-21, 2021. - During reporting period: C300 operated for 4,030.4 hrs; C400 for 1,253.6 hrs; C500 for 3,440.0 hrs.
1/1/2022 – 6/30/2022	1/31/2023	No deviations reported

7/1/2022 – 12/31/2022	1/31/2023	- No APCD or process equipment malfunctions or CPMS out-of-control periods reported. - No CPMS or process changes reported. - No deviations reported. - CPMS performance evaluation conducted the week of October 18, 2022. - During reporting period: C300 operated for 1,675.5 hrs; C400 for 2,992.8 hrs; C500 for 3,667.0 hrs.
1/1/2023 – 6/30/2023	7/31/2023	- CPMS reported inoperative period for C400 and C500 for 15 minutes. Engines were off during this time. - No CPMS or process changes reported. - CPMS performance evaluation schedules to be conducted October 2023. - During reporting period: C300 operated for 3250.3 hrs; C400 for 1619.4 hrs; C500 for 1766.2 hrs.
7/1/2023-12/31/2023	1/30/2024	No deviations reported.

* 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 23.³

OBSERVATION: The Consent Decree was terminated on June 4, 2014. (See Consent Decree Case No. 2:08-CV-00167-TS-PMV, not attached.) 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**

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

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

For RICE with a site rating of 500 hp or greater operated at the facility, identified as 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

³ 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.

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 9, below.

OBSERVATION: Civil Action No. 2:23cv252 appears to have duplicative emission limits to Consent Decree Case No. 2:08-CV-00167-TS-PMV and therefore EPA only assessed compliance with those emission limitations during this compliance evaluation.

(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 this compliance evaluation, the oxygen sensor on BC100 has not accumulated more than 1000 hours and therefore has not needed replacement.

(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.⁴

[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.]

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 9, below. Test results were submitted to the EPA in semi-annual reports, as required. 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.

OBSERVATION: Civil Action No. 2:23cv252 appears to have duplicative emission limits to Consent Decree Case No. 2:08-CV-00167-TS-PMV and therefore EPA only assessed

⁴ 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 Coyote Wash Compressor Station.

compliance with those emission limitations during this compliance evaluation.

Table 9: Results of Consent Decree Required Semi-Annual NO_x and CO Performance Testing

Emission Unit	Test Date	Avg. NO _x	NO _x Limit	Avg. CO	CO Limit	Avg. Catalyst Inlet Temp. (°F)	Avg. Catalyst ΔP* (inches H ₂ O)	Avg. Engine Load
		(g/hp-hr)		(g/hp-hr)				
C300	12/1/2022	0.19	1	0.07	1	737	5.1	90.7
C400 (East and West Bank)	10/27/2022	0.4	1	0.03	1	n.r	5.2 (E) 1.7 (W)	79.7
C500	10/26/2022	0.45	1	0.03	1	723	4.6	78
C300	1/9/2023	0.24	1	0.04	1	747	5.2	86
C300	5/1/2023	0.25	1	0.04	1	751	5.7	85
C400 (East and West Bank)	5/2/2023	0.41	1	0.05	1	720(E) and 747(W)	1.6(E) and 1.6(W)	95
C500	5/3/2023	0.46	1	0.06	1	721	6.2	88
C300	10/19/2023	0.18	1	0.05	1	738	5.2	89
C400 (East and West Bank)	10/19/2023	0.48	1	0.05	1	736(E) and 672(W)	1.6(E) and 2.0(W)	94
C500	11/8/2023	0.38	1	0.02	1	770	6	88.3
BC100	3/12/2024	0.05	1	0.03	1	1051	3.5	75.3
C500	5/7/2024	0.57	1	0.02	1	770	6.0	85
C300	5/7/2024	0.40	1	0.03	1	755	5.2	80
C400 (East and West Bank)	5/13/2024	0.49	1	0.05	1	738(E) and 687(W)	1.4(E) and 1.7(W)	88

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

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

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: No off-permit changes have been conducted at the Coyote Wash Compressor Station during the evaluation period covered by this inspection report (August 2021 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.

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

2. “Deviation” means any situation in which an emissions unit fails to meet a permit term or condition. A deviation is not always a violation. A deviation can be determined by observation or through review of data obtained from any testing, monitoring, or recordkeeping established in accordance with § 71.6(a)(3)(i) and (a)(3)(ii). For a situation lasting more than 24 hours which constitutes a deviation, each 24-hour period is considered a separate deviation. Included in the meaning of deviation are any of the following:
 - (a) A situation where emissions exceed an emission limitation or standard;
 - (b) A situation where process or emissions control device parameter values indicate that an emission limitation or standard has not been met; or

- (c) A situation in which observations or data collected demonstrate noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit.
- 3. The Permittee shall promptly report to the EPA deviations from permit requirements, including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. “Prompt” is defined as follows:
 - (a) Any definition of “prompt” or a specific time frame for reporting deviations provided in an underlying applicable requirement as identified in this permit.
 - (b) Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations will be submitted based on the following schedule:
 - (i) For emissions of a HAP or a toxic air pollutant (as identified in the applicable regulation) that continue for more than an hour in excess of permit requirements, the report shall be made within 24 hours of the occurrence.
 - (ii) For emissions of any regulated air pollutant, excluding a HAP or a toxic air pollutant that continues for more than 2 hours in excess of permit requirements, the report shall be made within 48 hours.
 - (iii) For all other deviations from permit requirements, the report shall be submitted with the semi-annual monitoring report.
 - (c) If any of the conditions in (i) or (ii) of paragraph (b) above are met, the Permittee shall notify the EPA by telephone (1-800-227-6312), facsimile (303-312-6409), or by email to r8airreportenforcement@epa.gov based on the timetables listed above. *[Notification shall specify that this notification is a deviation report for a Part 71 permit]*. A written notice, certified consistent with the Submissions section of this permit shall be submitted within 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: See Table 10, below, 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. MPLX did not report any deviations during the reporting period.

Table 10: Title V Semi-Annual (SIXMON) Reports for Coyote Wash Compressor Station

Reporting Period	Report Date	Received Date	Notes
7/1/2021 – 12/31/2021	1/31/2022	1/31/2022	- Reported that NSPS JJJJ testing conducted on C500 during first half of 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 did not operate in 2021. - Reported that semi-annual NOX and CO testing was conducted on C300, C400, and C500 in October 2021. BC100, C100, and C200 not tested since non-operational. 10.5 hrs of deviations reported for bad catalyst inlet temperature data due to gateway card or communications issues (9.5 hrs on C300, 0.75 hrs on C400, 0.25 hrs on C500).
1/1/2022 – 6/30/2022	7/31/2022	7/31/2022	No deviations reported.
7/1/2022 – 12/31/2022	1/31/2023	1/31/2023	- Reported that NSPS JJJJ testing conducted on C300 and C500 during first half of 2021. (3/8 and 3/9/22 respectively). - 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 2022. BC100, C100, and C200 did not operate in 2022. - Reported that semi-annual NOX and CO testing was conducted on C300, C400, and C500 in December 1, 2022 for C300 and October 2022 for C400 and C500. BC100, C100, and C200 not tested since non-operational. - No deviations reported.
1/1/2023 – 6/30/2023	7/28/2023	7/28/2023	- Reported that NSPS JJJJ testing conducted for C500 during first May 2023. - Reported that MACT ZZZZ CPMS monitoring was conducted per §63.6625 and §63.6635 (BC100, C100, C200, C300, C400, C500). - CPMS annual performance schedule for October 2023. - Reported that annual MACT ZZZZ testing was conducted on C300, C400, and C500 in May 2023. BC100, C100, and C200 did not operate in 2023. - Reported that semi-annual NOX and CO testing was conducted on C300, C400, and C500 in May 1-3, 2022 for C300, C400 and C500. BC100, C100, and C200 not tested since non-operational.

			• No deviations reported.
7/1/2023-12/31/2023	1/30/2024	1/30/2024	• No deviations reported.

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.
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:

U.S. Environmental Protection Agency
OCFO/OC/ACAD/FCB
Attn: Collections Team
1300 Pennsylvania Ave NW
Mail Code 2733R
Washington, D.C. 20004

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; and
- (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.

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

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

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

OBSERVATION: Annual emissions reports received by the EPA for the Coyote Wash Compressor Station are displayed in Table 11, below. Reports for calendar years 2021, 2022 and 2023 were received on March 30, 2022, March 30, 2023 and April 1, 2024, respectively.

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

Pollutant	Actual Emissions (tpy)		
	2021	2022	2023
NO _x	36.5	34.7	19.7
VOC	46.5	52.4	38.2
SO ₂	0.2	0.3	0.1
PM ₁₀	3	2.9	1.9
Lead	0.0	0.0	0.0
Total HAPs	11	12.8	6.8

OBSERVATION: Annual fees received for the Coyote Wash Compressor Station for the 2019 and 2020 reporting years are displayed in Table 12, below.

Table 12: Annual Fees Received for the Coyote Wash Compressor Station

Date Received	Reporting Year	Fee Paid
March 30, 2022	2021	\$4,847.03
March 30, 2023	2022	\$5,468.57
April 1, 2024	2023	\$3,998.60

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

1. Compliance with the Permit

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

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

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

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

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

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

- (b) The compliance certification shall be certified as to truth, accuracy, and completeness by a responsible official consistent with 40 CFR 71.5(d).
- (c) The certification shall include the following:
 - (i) Identification of each permit term or condition that is the basis of the

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

OBSERVATION: Title V Annual Compliance Certifications (TVACCs) submitted since the previous inspection are shown in Table 13, below.

Table 13: Facility-Wide Annual Compliance Certifications (TVACCs)

Reporting Period	Report Date	Date Received	Notes
1/1/2021 – 12/31/2021	1/31/2022	1/31/2022	• MACT ZZZZ: C100, C200, and BC100 not tested because they did not operate in 2021. C300 tested 3/31/2021, C400 tested 3/29/2021, C500 tested 3/30/2021. Deviations reported on engines C300, C400, and C500. • NSPS JJJJ: C500 tested on 3/30/2021. No deviations reported. • Permit testing requirements: C300 tested 10/28/2021, C400 tested 10/27/2021, C500 tested 10/28/2021. C100, C200, and BC100 not tested because non-operational in 2021. • Reported continuous compliance with all other permit conditions. • 10.5 hrs of deviations reported for bad catalyst inlet temperature data due to gateway card or communications issues (9.5 hrs on C300, 0.75 hrs on C400, 0.25 hrs on C500). Also reported 2.25 hrs of deviations due for bad catalyst inlet temperature data due to communications loss for the first half of 2021, which was inadvertently left off of the SIXMON report (but reported on the MACT ZZZZ report).

1/1/2022 – 12/31/2022	1/31/2023	1/31/2023	• NSPS JJJJ C500 was tested on 3/8/2022 which was less than a year after the previous performance test. • MACT ZZZZ: BC100, C100 and C200 were not tested because they did not operate during 2022. C300 received and passed annual MACT ZZZZ testing to test compliance with >93% CO reduction and per the conditions of the CD on 3/8/2022. Semiannual NOX and CO testing as specified in the consent decree was conducted 12/1/2022. C400 received and passed annual MACT ZZZZ testing to test compliance with >93% CO reduction and per the conditions of the CD on 3/9/2022. Semiannual NOX and CO testing as specified in the consent decree was conducted 10/27/2022. C500 received and passed annual MACT ZZZZ testing to test compliance with >93% CO reduction and per the conditions of the CD on 3/8/2022. Semiannual NOX and CO testing as specified in the consent decree was conducted 10/26/2022. • Reported continuous compliance with all other permit conditions. • No deviations reported.
1/1/2023- 12/31/2023	1/30/2024	1/30/2024	• No deviations reported.

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

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

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

1. Any document (application form, report, compliance certification, etc.) required to be submitted under this permit shall be certified by a responsible official as to truth, accuracy, and completeness. Such certifications shall state that based on information and

belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

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

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

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

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

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

3. CEDRI has the capability to receive Part 71 documents that require certification by a responsible official. Specifically, we have added a form to CEDRI under “State/Local/Tribe Rule or Permit.” The form allows for the user to submit four types of documents under Part 71: Clean Air Act 502(b)(10) change notification, a semi-annual monitoring report, a deviation notification, and a title V application. The use of CEDRI for submitting these reports is not mandatory. The job aide for how to submit reports in general can be found here:
https://www3.epa.gov/ttn/chief/cedri/Create_Reports_Job_Aide.pdf.

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

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

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

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

any permit condition.

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

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

1. Corrects typographical errors;
2. Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
3. Requires more frequent monitoring or reporting by the Permittee;
4. Allows for a change in ownership or operational control of a source where the EPA determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittee has been submitted to the EPA;
5. Incorporates into the Part 71 permit the requirements from preconstruction review permits authorized under an EPA-approved program, provided that such a program meets procedural requirements substantially equivalent to the requirements of 40 CFR 71.7 and 71.8 that would be applicable to the change if it were subject to review as a permit modification, and compliance requirements substantially equivalent to those contained in 40 CFR 71.6; or
6. Incorporates any other type of change which the EPA has determined to be similar to those listed in (1) through (5) above.

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

OBSERVATION: MPLX has not requested any permit amendments since the permit was issued.

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

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

- (c) Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
 - (d) Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - (i) A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I; and
 - (ii) An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA;
 - (e) Are not modifications under any provision of Title I of the CAA; and
 - (f) Are not required to be processed as a significant modification.
2. Notwithstanding the list of changes ineligible for minor permit modification procedures in 1 above, minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in an applicable implementation plan or in applicable requirements promulgated by the EPA.
3. An application requesting the use of minor permit modification procedures shall meet the requirements of 40 CFR 71.5(c) and shall include the following:
- (a) A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
 - (b) The source's suggested draft permit;
 - (c) Certification by a responsible official, consistent with 40 CFR 71.5(d), that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
 - (d) Completed forms for the permitting authority to use to notify affected states as required under 40 CFR 71.8.
4. The source may make the change proposed in its minor permit modification application immediately after it files such application. After the source makes the change allowed by the preceding sentence, and until the permitting authority takes any of the actions authorized by 40 CFR 71.7(e)(1)(iv)(A) through (C), the source must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time period, the source need not comply with the existing permit

terms and conditions it seeks to modify. However, if the source fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it.

5. The permit shield under 40 CFR 71.6(f) may not extend to minor permit modifications.

OBSERVATION: MPLX requested a Title V minor permit modification on February 13, 2024, documenting that engine BC100 was recently modified and reconstructed, therefore BC100 has triggered applicability to NSPS JJJJ as specified in 40 CFR 60.4230(a)(5). No additional requirements were requested as part of the minor modification permit application.

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

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

OBSERVATION: MPLX has not requested any major modifications since the permit was issued.

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

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

1. Additional applicable requirements under the CAA become applicable to a major Part 71 source with a remaining permit term of three or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and

conditions have been extended pursuant to 40 CFR 71.7(c)(3);

2. Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit;
3. The EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
4. The EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

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

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

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

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

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

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

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

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

1. Each change is not addressed or prohibited by this permit;
2. Each change shall meet with all applicable requirements and shall not violate any existing permit term or condition;
3. Changes under this provision may not include changes subject to any requirement of 40 CFR parts 72 through 78 or modifications under any provision of Title I of the CAA;
4. The Permittee must provide contemporaneous written notice to the EPA of each change, except for changes that qualify as insignificant activities under 40 CFR 71.5(c)(11). The written notice must describe each change, the date of the change, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change;
5. The permit shield does not apply to changes made under this provision;
6. The Permittee must keep a record describing all changes that result in emissions of any regulated air pollutant subject to any applicable requirement not otherwise regulated under this permit, and the emissions resulting from those changes;
7. The notice shall be kept on site and made available to the EPA on request, in accordance with the general recordkeeping provision of this permit; and
8. Submittal of the written notice required above shall not constitute a waiver, exemption, or shield from applicability of any applicable standard or PSD permitting requirements under 40 CFR 52.21 that would be triggered by the change.

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

1. This permit shall expire upon the earlier occurrence of the following events:
 - (a) Five (5) years elapse from the date of issuance; or
 - (b) The source is issued a Part 70 or Part 71 permit under an EPA-approved or delegated permit program.
2. Expiration of this permit terminates the Permittee's right to operate unless a timely and complete permit renewal application has been submitted at least 6 months but not more than 18 months prior to the date of expiration of this permit.
3. If the Permittee submits a timely and complete permit application for renewal, consistent

with 40 CFR 71.5(a)(2), but the EPA has failed to issue or deny the renewal permit, then all the terms and conditions of the permit, including any permit shield granted pursuant to 40 CFR 71.6(f) shall remain in effect until the renewal permit has been issued or denied.

4. The Permittee's failure to have a Part 71 permit is not a violation of this part until the EPA takes final action on the permit renewal application. This protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit any additional information identified as being needed to process the application by the deadline specified in writing by the EPA.
5. Renewal of this permit is subject to the same procedural requirements that apply to initial permit issuance, including those for public participation, affected state, and tribal review.
6. The application for renewal shall include the current permit number, description of permit revisions and off permit changes that occurred during the permit term, any applicable requirements that were promulgated and not incorporated into the permit during the permit term, and other information required by the application form.

APPENDIX A: Coyote Wash Compressor Station Aerial View



APPENDIX B: Photo Log

File Name	Description	Photographer
MOV_3569	Emissions from C-400 west stack while engine is off	M. Stovern
MOV_3570	Emissions from C-400 west stack while engine is off	M. Stovern
MOV_3571	Ram 5500 side profile	C. LeCortz
MOV_3572	Ram 5500 straight pipe	C. LeCortz
MOV_3573	Ram 5500 missing sensors	C. LeCortz
MOV_0621	C-400 blowdown	L. Favel