



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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Ref: 8ARD-PM

Thomas H. Gibbons  
HES Professional  
MPLX  
1515 Arapahoe Street, Tower 1, Suite 1600  
Denver, Colorado 80202

Re: Final Part 71 Operating Permit, Permit #V-UO-000005-2018.00, MPLX, Wonsits Valley Compressor Station

Dear Mr. Gibbons:

This letter is regarding the renewal of the 40 CFR part 71 Title V operating permit (Part 71 permit) for MPLX (formerly Andeavor Field Services, LLC), Wonsits Valley Compressor Station. The public comment period for the draft of this permit action ended on January 13, 2020. The U.S. Environmental Protection Agency received one comment letter that you sent on behalf of MPLX. A detailed response to the comments is enclosed.

Based on the information provided in MPLX's Part 71 permit renewal application, subsequent application updates, and the public comments on the draft permit, we are issuing the enclosed final renewed Part 71 permit for the Wonsits Valley Compressor Station. The new permit number is V-UO-000005-2018.00.

Please review each condition carefully and note any restrictions placed on this source. Procedures for appealing this permit can be found in 40 CFR 71.11(l). A petition to the Environmental Appeals Board (EAB) must be filed within 30 days of receipt of this final permit action. The permit will be effective on May 13, 2020, provided there are no appeals filed with the EAB.

If you have any questions concerning the enclosed final permit, please contact Lohitaksha (Lo.) Rao of my staff at (303) 312-6241.

Sincerely,

4/13/2020

X Debra Thomas

Signed by: DEBRA THOMAS

**Debra Thomas**  
Deputy Regional Administrator

Enclosures

cc: Mike Natchees, Director, Air Quality Program, Ute Indian Tribe

# Responses to Comments on the Draft Air Quality Operating Permit and Statement of Basis for the Wonsits Valley Compressor Station Pursuant to the Title V Operating Permit Program at 40 CFR Part 71

## Comments on Draft Part 71 Permit Section I.A – Facility Information

**Comment #1** (a)-(d): *This section of comments is in reference to the Statement of Basis which does not accompany the final permit.*

*Comments to the Statement of Basis a) “Section I.A – Location: There is a new mailing address: 1515 Arapahoe Street, Tower 1, Suite 1600, Denver CO 80202.” b) “Section I.B – Contact: Facility Contact (name and address change): Thomas Gibbons; HES Professional MPLX 1515 Arapahoe Street, Tower 1, Suite 1600; Denver, CO 80202 • Responsible Official (name and address change): James O. Wakeley; Operations Senior Director 19100 Ridgewood Parkway; San Antonio, TX 78259.” c) “Section I.B – Description of Operations: This description is obsolete; please see the 2018 application, and Comment #3 below, for the current process description.” d) “Section II – Applicable Requirement Review: Subsection L. 40 CFR Part 63, Subpart HH: National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities – The description that states “The affected unit is the dehydration unit D-1 and control devices C-2 and FL-1 operating at the facility” is incorrect. Flare FL-1 is the only Subpart HH control device; a backup control device is not required by Subpart HH and C-2 is incorrectly described as a Subpart HH control device. Moreover, the information provided in the Part 71 permit renewal application did not describe C2 as a Subpart HH control device.”*

*EPA Response to Comments on the Statement of Basis for the Draft Part 71 Permit:* *There is no Statement of Basis issued with the final permit and we do not make changes to the Statement of Basis for the draft permit. MPLX's comments are a part of the final permit record and any necessary requested corrections to information in the Statement of Basis for the draft permit are, therefore, documented in the permanent permit record in the form of the comments and this response to the comments. Additionally, the contact information in our internal tracking database has been updated based on the comment.*

**Comment #2:** “The current responsible official is James O. Wakeley; Operations Senior Director.”

*EPA Response:* *We have revised the permit to accurately reflect the correct current responsible official.*

**Comment #3:** “The process description is not correct (see application submitted to EPA, dated 4/10/2018). a) There is three-phase separation at the inlet (gas, condensate, and produced water). b) The separated condensate is pumped to the station discharge and sent off site to a gas plant. c) The separated produced water is temporarily stored in the slop tank (unit T-1, controlled with combustor unit C-1). Liquids from the low-pressure scrubber (condensate and produced water) are also sent to T-1. d) Liquids from the slop tank, T-1, are gravity fed off site to the Battery 4 facility. e) Gas is compressed to approximately 1200 psig. f) The vapors from the reboiler are routed to the BTEX condenser to remove liquids that drain into the distillate tank. Overhead vapors from the BTEX condenser and flash gas from the flash tank are sent to an emission control device (open flare, unit FL-1, with backup combustor, unit C-2). g) Distillate tank liquids are pumped offsite to the Battery 4 facility.”

*EPA Response:* *We have revised the permit to accurately describe the operations at the facility. Please*

see our response to Comment #6 for further details regarding emissions unit C-2.

## **Section I.B – Emissions Units and Emissions Generating Activities**

**Comment #4:** “a) The rating for Unit R-1 is listed incorrectly in the draft permit; the correct rating is 1.0 MMBtu/hr. b) Please state that C-2 is the ‘backup combustor’ for Unit D-1. c) Unit T-1 is more aptly named a ‘slop tank’ rather than a ‘condensate’ tank because the tank stores mostly produced water. d) There is no truck loadout on site (delete Unit LO). e) Footnote to Table 2 has a typographical error; it should indicate ‘Burn’ (not ‘Bur’).”

*EPA Response:* We have revised the permit to correct the Unit R-1 rating, state that C-2 is the backup combustor for D-1, correct the name for Unit T-1, remove emissions unit LO and correct the typographical error in the footnote to Table 2. While we have changed the reference to emissions unit C-2 as requested, we do not agree that emissions unit C-2 is exempt from 40 CFR part 63 requirements. Please see our response to Comment #6 for further details.

## **Section II.D.2 – Compliance Requirements**

**Comment #5:** “Since the initial performance testing has already been completed for all engines, please delete reference to initial performance testing.”

*EPA Response:* We have not revised the permit as requested to delete any reference to initial performance testing. Instead, we have revised the permit to indicate in a note to the Permittee that initial performance testing has been completed for all currently operating engines.

## **Section III.A – Applicability**

**Comment #6:** “Please delete reference to backup combustor C-2 in Section III since it is not a Subpart HH control device. Flare FL-1 is the only Subpart HH control device; a backup control device is not required by Subpart HH.”

*EPA Response:* The EPA does not agree with the commenter’s assertion regarding emissions unit C-2. Wonsits Valley operates a dehydration unit (emissions unit D-1) at a major source subject to the large glycol dehydrator requirements of 40 CFR part 63, subpart HH (MACT HH). For each large glycol dehydration process vent, the Permittee must control air emissions according to the standards of § 63.765(b)(1)(i) or (ii), which require process vents to be connected to a control device or combination of control devices through a closed-vent system. Wonsits Valley utilizes two control devices (emissions units FL-1 and C-2) for the process vents associated with D-1. FL-1 and C-2 do not control emissions from any other emissions unit at the facility, but do allow D-1 to operate with fewer interruptions and less downtime than if there were only one control device. MACT HH does not provide any exemptions for “backup” combustors. It does provide for “a combination of control devices,” but all of those devices are explicitly subject to MACT requirements 40 CFR § 63.765(b)(1)(i), (ii). The term “backup” does not allow the operations at a facility to avoid applicable federal regulations. If C-2 were not subject to the requirements of MACT HH, then D-1 would not be allowed to operate if FL-1 was nonoperational. Otherwise, the source would be in violation of MACT HH, because C-2 would essentially not be allowed as a control device and thus D-1 would be considered to be venting to the atmosphere for the purposes of calculating potential to emit (PTE).

*Further, as stipulated in the consent decree entered in Case No. 2:08-CV-00167-TS-PMV in the U.S. District Court, District of Utah (Consent Decree) Paragraph 15 and 17, both the Flare (FL-1) and Control Device (C-2) are subject to Subpart HH. The Consent Decree also stipulates in Paragraph 17.b. that “Nothing in this Paragraph shall affect [MPLX’s] obligation to meet applicable requirements of 40 C.F.R. Part 63.” The term “back-up” Combustor as listed in the Consent Decree does not exclude C-2 from complying with Subpart HH.*

*For the above reasons, references to C-2 will be retained in the permit.*

### **Section III.D.3:**

**Comment #7:** “Please delete reference to backup combustor C-2 in Section III since it is not a Subpart HH control device. Flare FL-1 is the only Subpart HH control device; a backup control device is not required by Subpart HH.”

*EPA Response: Please see response to comment #6.*

### **Condition III.E:**

**Comment #8:** “Please delete reference to 40 CFR 63.772(f) since the applicable sections of (f) do not apply to this facility. 40 CFR §63.772(f) states ‘This paragraph applies to the demonstration of compliance with the control device performance requirements specified in §63.771(d)(1)(i), (e)(3), and (f)(1)’ and none of these sections are applicable.”

*EPA Response: The EPA has determined that emissions unit C-2 is an affected unit as a control device as specified in 40 CFR part 63, subpart HH. C-2 is an enclosed combustor subject to the requirements of §63.772(f) because the unit is subject to §63.771(d)(1)(i). Therefore, these conditions have not been removed.*

### **Condition III.E.3:**

**Comment #9:** “Please delete reference to backup combustor C-2 in Section III since it is not a Subpart HH control device. Flare FL-1 is the only Subpart HH control device; a backup control device is not required by Subpart HH. §63.772(e)(1)(i) states that a flare is exempt from the requirements to conduct performance tests and design analyses under section §63.772(e). The only part of §63.772(e) that applies to the flare, FL-1, is §63.772(e)(2).”

*EPA Response: Please see response to comment #6. The EPA has determined that emissions unit C-2 is an affected unit as a control device as specified in 40 CFR part 63, subpart HH. C-2 is an enclosed combustor and is thus subject to the requirements of paragraph (e)(3) of §63.772. As noted: FL-1 is subject to §63.772(e)(2). Therefore, these conditions have not been removed.*

### **Condition III.E.4:**

**Comment #10:** “Please delete this condition since 40 CFR 63.772(f) is not applicable to this facility. 40 CFR §63.772(f) states ‘This paragraph applies to the demonstration of compliance with the control

device performance requirements specified in §63.771(d)(1)(i), (e)(3), and (f)(1)' and none of these sections are applicable to this facility.”

*EPA Response: The EPA has determined that emissions unit C-2 is an affected unit as a control device as specified in 40 CFR part 63, subpart HH. C-2 is an enclosed combustor subject to the requirements of §63.772(f) because the unit is subject to §63.771(d)(1)(i). Therefore, these conditions have not been removed.*

**Condition III.F.2:**

**Comment #11:** “Please delete reference to backup combustor C-2 in Section III since it is not a Subpart HH control device. Flare FL-1 is the only Subpart HH control device; a backup control device is not required by Subpart HH.”

*EPA Response: Please see response to comment #6.*

**Condition III.H.3:**

**Comment #12:** “Please delete this condition since the Notification of Compliance Status Report (a one-time requirement) has already been completed.”

*EPA Response: The Notification of Compliance Status Report must be resubmitted if, for example, a modification to the facility involving the addition of processes or equipment has occurred. As noted in 40 CFR § 63.775(d), subsequent submittals may refer to previous submittals instead of duplicating and resubmitting the previously submitted information. The Title V operating permit program allows for the inclusion of requirements in the permit that do not apply at the time of permit issuance, in order to reflect the same flexibility in compliance as the applicable requirement allows. As written, the permit provides the option for the Permittee to change a compliance method without having to modify the permit. Therefore, this condition has not been removed.*

**Condition IV.D.1:**

**Comment #13:** “Please delete this condition since the initial performance testing and other compliance demonstrations have already been completed for all engines.”

*EPA Response: We have not revised the permit as requested to delete any reference to initial performance testing. Instead, we have revised the permit to indicate in a note to the Permittee that initial performance testing has been completed for all currently operating engines.*

**Condition IV.D.5:**

**Comment #14:** “Please delete this condition since initial compliance with the emission limitations, operating limitations, and other requirements has already been demonstrated for all engines.”

*EPA Response: We have not revised the permit as requested to delete any reference to initial compliance with the emission limitations, operating limitations, and other requirements. Instead, we have revised the permit to indicate in a note to the Permittee that initial performance testing has been completed for all currently operating engines.*

**Condition V.B.1(a):**

**Comment #15:** “For timeframe clarification, please add ‘per calendar year’ after ‘140 hours’.”

*EPA Response:* Condition V.B.1(a) of the permit is part of a section listing the requirements of the Consent Decree. The Consent Decree itself does not include the requested “per calendar year” language, but we agree that “per calendar year” expresses the intent of the provision and have added a footnote to clarify that point. In any case, the Consent Decree also stipulates in Paragraph 17.b. that “Nothing in this Paragraph shall affect [MPLX’s] obligation to meet applicable requirements of 40 C.F.R. Part 63.” It is important to note that part 63 does not provide **any** allowance for control device downtime; that is, part 63 does not permit **any** operation of the glycol dehydrator (D-1) without the use of a control device. Therefore, the effect of the 140 hours provision of the Consent Decree is to limit the period during which the backup combustor may have its pilot light off; because of the part 63 requirements, the backup combustor may only have the pilot light off if the primary combustor is in operation. That is, at all times the dehydrator is operational, the process stream must be routed to one of the two combustors, and the combustor to which the process stream is routed must be functioning. Specifically, the process stream must be routed to the FL-1 control device during any downtime for C-2. If FL-1 is also nonoperational, then D-1 must be shut in. No uncontrolled emissions at any time may be intentionally vented to the atmosphere.

**Condition V.C.1(a):**

**Comment #16:** “Please delete this condition since this requirement to connect the ‘condensate’ storage tank, identified as T-1 in this permit, to an existing or new combustor at the facility has already been completed.”

*EPA Response:* We have retained this condition because the source is subject to certain requirements of the Consent Decree. This Consent Decree has been terminated, but by its terms this requirement for Wonsits Valley survives termination and remains in effect in perpetuity. Instead, we have revised the permit to indicate in a note to the Permittee that that these conditions have been satisfied.

**Condition V.C.1(b):**

**Comment #17:** “Please delete this condition since this requirement to certify to the EPA that the design of the conveyance systems from the condensate storage tank to the combustor does not, under normal operating conditions, cause or contribute to a release of VOCs from the condensate storage tank through thief hatches or pressure relief valves has already been completed.”

*EPA Response:* We have retained this condition because the source is subject to certain requirements of the Consent Decree. This Consent Decree has been terminated, but by its terms this requirement for Wonsits Valley survives termination and remains in effect in perpetuity. Instead, we have revised the permit to indicate in a note to the Permittee that that these conditions have been satisfied.

**Condition V.D.1(c)(i):**

**Comment #18:** “Please delete this condition since this requirement to conduct initial performance tests for NO<sub>x</sub> and CO emissions on each RICE has already been completed.”

*EPA Response:* We have retained this condition because the source is subject to certain requirements of the Consent Decree. This Consent Decree has been terminated, but by its terms this requirement for Wonsits Valley survives termination and remains in effect in perpetuity. Instead, we have revised the permit to indicate in a note to the Permittee that that these conditions have been satisfied.

**Condition VI.B.I:**

**Comment #19:** “This condition states: ‘The Permittee shall submit to the EPA all reports of any required monitoring under this permit semiannually. The first report shall cover the period from the effective date of this permit through December 31, 2019.’ Since the effective date of the permit will be after December 31, 2019, the first semiannual report will likely cover the 6-month period ending June 30, 2020, assuming that the final permit is issued in the first half of 2020.”

*EPA Response:* We have revised the permit to reflect conditions that the first report has already been submitted for this facility and to reflect the continuation of the reporting periods that the facility operated under in permit V-UO-000005-2000.00, for consistency.

**Condition VII.C.3.(a):**

**Comment #20:** “For current Permit V-UO-000005-2000.00, Condition VII.C.3.(a), the annual Compliance Certification that is due January 31, 2020, for CY2019. Assuming EPA issues Permit V-UO-000005-2018.00 such that the effective date is April 1, 2020, or earlier, the permit should include a clarification regarding Condition VII.C.3.(a) that the first Compliance Certification is due April 1, 2021, for the 12-month period ending December 31, 2020.”

*EPA Response:* We have not revised the permit exactly as requested, but have revised the permit to reflect the reporting periods that the facility operated under permit V-UO-000005-2000.00 for consistency. This would ensure no new annual and semi-annual reports are submitted off schedule of what has been routine since the issuance of the initial permit. Annual reports shall be submitted by January 31 of each year that this permit is effective covering the dates as specified in Condition VI.B.1 and VII.C.3.(a) of the permit.