



January 13, 2020

Mr. Lohitaksha Rao
U.S. Environmental Protection Agency Region 8
Air & Radiation Division
Mail Code 8ARD-PM
1595 Wynkoop Street
Denver, CO 80202-1129

via email (rao.lohitaksha@epa.gov)

**RE: Wonsits Valley Compressor Station (Uintah County, Utah)
Public Comments on Draft Part 71 Permit V-UO-000005-2018.00
Docket ID: EPA-R08-OAR-2018-0349**

Dear Mr. Rao:

MPLX, operator of the Wonsits Valley Compressor Station located in Uintah County, Utah, is submitting the following public comments on draft Part 71 Permit V-UO-000005-2018.00 on behalf of Andeavor Field Services, LLC.

Statement of Basis Comments

1. Statement of Basis Comments:

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c) **Section I.B – Description of Operations:** This description is obsolete; please see the 2018 application, and Comment #3 below, for the current process description.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 C-2 as a Subpart HH control device.

Draft Permit Comments

2. **Section I.A:** The current responsible official is James O. Wakeley; Operations Senior Director.
3. **Section I.A:** 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.
4. **Section I.B:**
 - 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”).
5. **Condition II.D.2:** Since the initial performance testing has already been completed for all engines, please delete reference to initial performance testing.
6. **Condition III.A:** 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.

7. **Condition III.D.3:** 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.
8. **Condition III.E:** 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.
9. **Condition III.E.3:** 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).
10. **Condition III.E.4:** 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.
11. **Condition III.F.2:** 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.
12. **Condition III.H.3:** Please delete this condition since the Notification of Compliance Status Report (a one-time requirement) has already been completed.
13. **Condition IV.D.1:** Please delete this condition since the initial performance testing and other compliance demonstrations have already been completed for all engines.
14. **Condition IV.D.5:** Please delete this condition since initial compliance with the emission limitations, operating limitations, and other requirements has already been demonstrated for all engines.
15. **Condition V.B.1.(a):** For timeframe clarification, please add “per calendar year” after “140 hours”.
16. **Condition V.C.1.(a):** 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.
17. **Condition V.C.1.(b):** 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.

18. **Condition V.D.1.(c).(i):** Please delete this condition since this requirement to conduct initial performance tests for NO_x and CO emissions on each RICE has already been completed.
19. **Condition VI.B.1:** 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.
20. **Condition VII.C.3.(a):** 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.

If you have any questions regarding these public comments, please contact me at (303) 454-6685 or THGibbons@marathonpetroleum.com.

Sincerely,



Thomas H. Gibbons
HES Professional