UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
1595 Wynkoop Street
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Ref: 8ENF-AT

NOV 2 2 2019

CERTIFIED MAIL NO.
RETURN RECEIPT REQUESTED

Mr. Gary R. Heminger, CEO, Chairman
MPLX LP
200 E. Hardin St.
Findlay, OH 45840-4963

The Corporation Trust Company, Registered Agent for
MPLX LP
Corporation Trust Center
1209 Orange St.
Wilmington, DE 19801

Re: Notice of Violation Pursuant to 42 U.S.C. § 7413(a) to MPLX LP

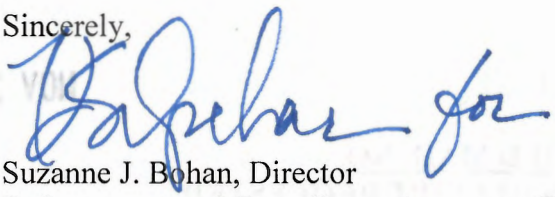
Dear Mr. Heminger:

The U.S. Environmental Protection Agency is issuing the enclosed Notice of Violation (NOV) to MPLX LP (MPLX) for alleged violations arising under the Clean Air Act (the Act) Section 112(d), 42 U.S.C. § 7412(d), and its implementing regulations for the National Emission Standards for Hazardous Air Pollutants, at 40 C.F.R. Part 63. Also, for violations arising under Section 111 of the Act, 42 U.S.C. § 7111, and its implementing regulations for New Source Performance Standards at 40 C.F.R. Part 60. Finally, for alleged violations arising under Section 502(b) of the Act, 42 U.S.C. §§ 7661-7661f, and its implementing regulations for Title V Permits at 40 C.F.R. Part 71. Violations of the Act and the regulations are alleged with specificity in the NOV at the following MPLX oil and gas production facilities on the Uintah and Ouray Reservation in Utah: Chapita Compressor Station, Coyote Wash Compressor Station, Island Compressor Station, and Wonsits Valley Compressor Station. These facilities were formerly owned and operated by Andeavor Logistics LP.

Section 113(a) of the Clean Air Act provides that whenever, based on any information available to the Administrator of the EPA, the Administrator finds that any person has violated, or is in violation of an applicable implementation plan, the Administrator may issue an administrative compliance order, issue an administrative penalty order, or bring a civil judicial action.

This NOV provides MPLX with an opportunity to schedule a meeting to discuss these alleged violations. Please have counsel contact Lauren Hammond, Sr. Assistant Regional Counsel, at (303) 312-7081 or Hammond.lauren@epa.gov, within 30 days of receipt of this NOV if MPLX would like to schedule a meeting.

Sincerely,



Suzanne J. Bohan, Director
Enforcement and Compliance Assurance Division

cc: The Honorable Luke Duncan, Chairman, Ute Indian Tribe
Tony Small, Ute Indian Tribe Vice-Chairman
Shaun Chapoose, Ute Indian Tribe Councilman
Edred Secakuku, Ute Indian Tribe Councilman
Ronald Wopsock, Ute Indian Tribe Councilman
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Bruce Pargeets, Director, Ute Indian Tribe Energy & Minerals Department
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ecc: Sara Loiacono, EPA
Lauren Hammond, EPA
Jason Deardorff, EPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

IN THE MATTER OF:	**NOTICE OF VIOLATION**
MPLX LP (formerly Andeavor Logistics) **200 East Hardin Street** **Findlay, Ohio 458404963**	**Docket No. CAA-08-2020-0002** Proceedings Pursuant to Section 113(a)(1) of the Clean Air Act, 42 U.S.C. § 7413(a)(1)

The United States Environmental Protection Agency (EPA) is issuing this Notice Of Violation (NOV) pursuant to Section 113(a)(1) of the Clean Air Act (the Act), 42 U.S.C. § 7413(a)(1), to notify MPLX LP (MPLX), formerly Andeavor Logistics LP (Andeavor), that MPLX has violated and is in violation of the Act at the Chapita Compressor Station (Chapita C.S.), Coyote Wash Compressor Station (Coyote Wash C.S.), Island Compressor Station (Island C.S.), and Wonsits Valley Compressor Station (Wonsits Valley C.S.), which are part of MPLX's oil and gas production operations on the Uintah and Ouray Reservation in Utah.

I. STATUTORY AND REGULATORY BACKGROUND

1. For the promotion of the public health, welfare and productive capacity of the U.S. population, the Act's purpose is to protect and enhance the quality of the nation's air. 42 U.S.C. § 7401(b)(1).

National Emission Standards for Hazardous Air Pollutants

2. Section 112(d)(1) of the Act, 42 U.S.C. § 7412(d)(1), requires EPA to promulgate emission standards for sources of hazardous air pollutants (HAPs), including oil and natural gas production facilities, to achieve the maximum emission reduction of HAPs possible for each source category.

3. The HAPs, listed at Section 112(b)(1) of the Act, 42 U.S.C. § 7412(b)(1), emitted by oil and gas production facilities include, but are not limited to, benzene, ethyl benzene, toluene, and xylenes, collectively referred to as BTEX. Each of the HAPs emitted from oil and natural gas production facilities can cause adverse health effects.

4. Pursuant to Section 112(d) of the Act, 42 U.S.C. § 7412(d), EPA promulgated the National Emission Standards for Hazardous Air Pollutants (NESHAP) General Provisions, at 40 C.F.R. Part 63, Subpart A, which contain general provisions that apply as specified in the relevant NESHAP, 40 C.F.R. § 63.1(a)(4)(i).

5. Pursuant to Section 112(d) of the Act, 42 U.S.C. § 7412(d), on June 17, 1999, EPA promulgated the NESHAP for Oil and Natural Gas Production Facilities at 40 C.F.R. Part 63, Subpart HH (MACT HH). *See* 64 Fed. Reg. 32628.

6. Pursuant to Section 112(d) of the Act, 42 U.S.C. § 7412(d), on June 15, 2004, EPA promulgated the NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE) at 40 C.F.R. Part 63, Subpart ZZZZ (MACT ZZZZ). *See* 69 Fed. Reg. 33506.

7. The NESHAP General Provisions that apply to MACT ZZZZ are specified in 40 C.F.R. Part 63, Subpart ZZZZ, Table 8, and include the performance test reporting requirements in 40 C.F.R. § 63.7(g).

8. Pursuant to 40 C.F.R. §§ 63.761, 63.6675 and 63.2, a major source of HAP emissions means any facility (as defined at 40 C.F.R. §§ 63.761 and 63.1271), that has the potential to emit considering controls, in the aggregate, 10 tons per year (tpy) or more of any single HAP or 25 tpy or more of any combination of HAP. For production field facilities (facilities located prior to the point of custody transfer), only HAP emissions from glycol dehydration units and storage vessels shall be aggregated for a major source determination.

New Source Performance Standards

9. Section 111 of the Act, 42 U.S.C. § 7411, requires EPA to promulgate performance standards for new stationary sources, including stationary spark ignition (SI) internal combustion engines (ICE), to achieve the maximum emission reductions possible for each source category.

10. Pursuant to Section 111 of the Act, 42 U.S.C. § 7411, EPA promulgated the NSPS General Provisions, at 40 C.F.R. Part 60, Subpart A, which contain general provisions that apply to the owner or operator of any stationary source that contains an affected facility, the construction or modification of which is commenced after the date of publication of any NSPS standard applicable to the facility. 40 C.F.R. § 60.1(a).

11. Pursuant to Section 111 of the Act, 42 U.S.C. § 7411, on January 18, 2008, EPA promulgated the NSPS for Stationary SI ICE at 40 C.F.R. Part 60, Subpart JJJJ (NSPS JJJJ). *See* 73 Fed. Reg. 3591.

12. NSPS JJJJ requires owners and operators of new stationary SI ICE to meet, among other requirements, certain volatile organic compound (VOC) emissions standards and testing and reporting requirements.

13. The NSPS General Provisions that apply to NSPS JJJJ are specified in 40 C.F.R. Part 60, Subpart JJJJ, Table 3, and include, among other requirements, the performance test requirements in 40 C.F.R. § 60.8 and the standards and maintenance compliance requirements in 40 C.F.R. § 60.11.

Title V

14. Title V of the Act, 42 U.S.C. §§ 7661-7661f, establishes an operating permit program for sources of air pollution.

15. In accordance with Section 502(b) of the Act, 42 U.S.C. § 7661a(b), EPA promulgated regulations implementing Title V of the Act. *See* 61 Fed. Reg. 34228 (July 1, 1996). Those regulations for federal air quality operating permit programs are codified at 40 C.F.R. Part 71.

16. Section 502(a) of the Act, 42 U.S.C. § 7661a(a) and 40 C.F.R. § 71.4(b) require that the Administrator administer and enforce an operating permit program in Indian country, as defined in 40 C.F.R. § 71.2. The effective date of the part 71 program in Indian country was March 22, 1999.

17. Section 502(a) of the Act, 42 U.S.C. § 7661a(a), and 40 C.F.R. § 71.7(b) provide that, after the effective date of any permit program approved or promulgated under Title V of the Act, no source subject to Title V may operate except in compliance with a Title V operating permit (Title V permit).

18. On September 10, 2013, EPA issued a Title V operating permit (V-UO-000012-2006.00) to QEP Field Services Company (QEPFS) (a predecessor of Andeavor) for the Chapita C.S. The permit became effective on October 10, 2013.

19. On March 19, 2019, EPA issued a renewal Title V operating permit (V-UO-000012-2018.00) to Andeavor for the Chapita C.S. The permit became effective on April 18, 2019.

20. On December 2, 2013, EPA issued a Title V operating permit (V-UO-000015-2006.00) to QEPFS for the Coyote Wash C.S. The permit became effective on January 1, 2014.

21. On December 2, 2013, EPA issued a Title V operating permit (V-UO-000011-2006.00) to QEPFS for the Island C.S. The permit became effective on January 1, 2014.

22. On September 10, 2013, EPA issued a Title V operating permit (V-UO-000005-2000.00) to QEPFS for the Wonsits Valley C.S. The permit became effective on October 10, 2013.

II. FACTUAL BACKGROUND & FINDINGS OF VIOLATION

Factual Background

23. Questar Gas Management Company, a predecessor of Andeavor, entered into a consent decree with the United States (Case No. 2:08-CV-00167-TS-PMW) (hereinafter referred to as "the federal consent decree") on July 3, 2012, to resolve alleged violations of several MACT HH and MACT ZZZZ requirements at the Coyote Wash, Chapita, Island, River Bend, and Wonsits Valley Compressor Stations.

24. The federal consent decree was terminated on June 4, 2014, but several requirements from the decree survived termination and are memorialized in Title V permits for facilities that were subject to the decree and some of which are at issue in this NOV.

25. On August 16, 2017, EPA conducted a full compliance evaluation of the Wonsits Valley C.S. (hereinafter referred to as "2017 Wonsits Valley compliance evaluation").

26. On July 31, 2018, EPA conducted a full compliance evaluation of the Island C.S (hereinafter referred to as "2018 Island compliance evaluation").

27. On March 12, 2019, EPA conducted a full compliance evaluation of the Coyote Wash C.S (hereinafter referred to as "2019 Coyote Wash compliance evaluation").

28. On March 12, 2019, EPA conducted a full compliance evaluation of the Wonsits Valley C.S. (hereinafter referred to as "2019 Wonsits Valley compliance evaluation").

29. At all times relevant to this NOV, Andeavor owned and operated several compressor stations on the Uintah and Ouray Indian Reservation in Utah. Among those facilities are the Chapita C.S., Coyote Wash C.S., Island C.S., and Wonsits Valley C.S.

30. On July 30, 2019, MPLX merged with Andeavor.

31. MPLX is a publicly-traded company midstream oil and gas company. MPLX is incorporated in Delaware and maintains its principal executive offices in Findlay, Ohio.

32. MPLX is a "person" as defined by Section 302(e) of the Act, 42 U.S.C. § 7602(e).

Findings of Violation—MACT HH: Failure to Comply with Regulations for Enclosed Combustors at Island C.S. and Wonsits Valley C.S.

33. At the Island C.S., Andeavor operated and MPLX operates, a 15 million standard cubic feet per day (MMscfd) glycol dehydrator (D-1). At all times relevant to this NOV, the actual annual average benzene emissions from the glycol dehydrator (D-1) at the Island C.S were equal to or greater than 0.90 megagrams per year (Mg/yr).

34. Under MACT HH, a "large glycol dehydration unit" is defined as a "glycol dehydration unit with an actual annual average natural gas flowrate equal to or greater than 85 thousand standard cubic meters per day and actual annual average benzene emissions equal to or greater than 0.90 Mg/yr, determined according to [40 C.F.R.] § 63.772(b). A glycol dehydration unit complying with the 0.9 Mg/yr control option under [40 C.F.R.] § 63.765(b)(1)(ii) is considered to be a large dehydrator." 40 C.F.R. § 63.761.

35. The glycol dehydrator at the Island C.S. (D-1) is considered a "large glycol dehydration unit" under MACT HH.

36. Emissions from the glycol dehydrator (D-1) at the Island C.S. are controlled by a flare (FL-1).

37. At the Wonsits Valley C.S., Andeavor operated and MPLX operates, a 100 MMscfd glycol dehydrator (D-1). At all times relevant to this NOV, the actual annual average benzene emissions from the glycol dehydrator (D-1) at the Wonsits Valley C.S. were equal to or greater than 0.90 megagrams per year (Mg/yr).

38. The glycol dehydrator at the Wonsits Valley C.S. (D-1) is considered a "large glycol dehydration unit" under MACT HH.

39. Emissions from the glycol dehydrator (D-1) at the Wonsits Valley C.S. are controlled by a flare (FL-1).

40. The Island C.S. and the Wonsits Valley C.S. are major sources of HAPs under MACT HH.

41. Pursuant to Paragraph IV.B.3(a) of the Title V operating permit for the Island C.S. , during periods when the flare is down, emissions from the dehydrator at the Island C.S. are to be routed to a Process Fabrication & Equipment, Inc. TH-42 enclosed combustor (C-1).

42. Pursuant to Paragraph V.B.3(a) of the Title V operating permit for the Wonsits Valley C.S., during periods when the flare is down, emissions from the dehydrator at the Wonsits Valley C.S. are to be routed to a Pyrohelix enclosed combustor (C-2).

43. C-1 and C-2 are used for recovering or oxidizing HAP or VOC vapors, and are, therefore, considered control devices under MACT HH.

44. Paragraph II.C.3 of the Title V operating permit for the Island C.S. and the Title V operating permit for the Wonsits Valley C.S. require that Andeavor and MPLX shall comply with the applicable control device requirements specified in § 63.771(d) or § 63.771(f).

45. 40 C.F.R. § 63.771(d)(1)(i) requires enclosed combustion devices to reduce either TOC or total HAP in waste gas routed to the control device, as demonstrated through performance testing in accordance with the requirements of 40 C.F.R. § 63.772(e).

46. Pursuant to 40 C.F.R. § 63.772(e)(3)(vi), an initial performance test and periodic performance tests are required for enclosed combustors, unless the control device is tested under, and meets the criteria of, 40 C.F.R. § 63.772(h), or the combustion control device demonstrates during the performance test that combustion zone temperature is an indicator of destruction efficiency and operates at a minimum temperature of 760 °C.

47. Paragraph II.D. of the Title V operating permit for the Island C.S. requires that Andeavor and MPLX shall determine compliance with the requirements of MACT HH using the applicable test methods and compliance procedures specified in § 63.772.

48. In a telephone conversation with EPA on October 22, 2018, Andeavor indicated that the enclosed combustors C-1 and C-2 were not tested according to 40 C.F.R. § 63.772(h); therefore, the testing exemption does not apply.

49. According to information provided to EPA by Andeavor as part of the 2018 Island compliance evaluation, as of the date of the 2018 Island compliance evaluation, no performance test had been conducted on C-1.

50. According to information provided to EPA by Andeavor as part of the 2017 Wonsits Valley compliance evaluation, a performance test was conducted on C-2 on April 8, 2009.

51. According to information provided to EPA by Andeavor as part of the 2019 Wonsits Valley compliance evaluation, as of the date of the 2019 Wonsits Valley compliance evaluation, no subsequent (periodic) performance tests had been conducted on C-2.

52. EPA advised Andeavor representatives that combustors C-1 and C-2 at the Island C.S. and the Wonsits Valley C.S., respectively, are to comply with the performance testing and control efficiency requirements of MACT HH by phone between September 20, 2018 and November 20, 2018, by email on multiple dates between October 23, 2018, and December 3, 2018, and in-person during the 2019 Wonsits Valley compliance evaluation.

53. By failing to conduct periodic performance tests on combustor C-1 at the Island C.S., Andeavor violated and MPLX continues to violate the MACT HH testing requirements at 40 C.F.R. § 63.772(e)(3)(vi) and the requirements of Paragraph II.D of the Title V operating permit for the Island C.S.

54. By failing to conduct periodic performance tests on combustor C-2 at the Wonsits Valley C.S., Andeavor violated and MPLX continues to violate the MACT HH testing requirements at 40 C.F.R. § 63.772(e)(3)(vi).

55. Paragraph II.E.2. of the Title V operating permit for the Island C.S. and Paragraph II.D.2. of the Title V operating permit for the Wonsits Valley C.S. require that each control device required to comply with MACT HH shall comply with the monitoring requirements as specified in § 63.773(b) or § 63.773(d).

56. Pursuant to 40 C.F.R. § 63.772(f), an owner or operator shall demonstrate compliance with the control device performance requirements at 40 C.F.R. § 63.771(d)(1)(i) by establishing a site-specific maximum or minimum monitoring parameter value according to the requirements of 40 C.F.R. § 63.773(d)(5)(i), which requires that operating parameter values be established through performance testing.

57. By failing to conduct performance tests on combustor C-1 at the Island C.S. and combustor C-2 at the Wonsits Valley C.S., Andeavor failed and MPLX continues to fail to demonstrate compliance with the control device performance requirements at 40 C.F.R. § 63.771(d)(1)(i), in violation of 40 C.F.R. §§ 63.772(f) and 63.773(d)(5)(i) and the

facilities' Title V operating permits.

MACT HH: Failure to Continuously Operate a Control Device During Operation of Dehydrator at Wonsits Valley C.S.

58. In its semi-annual periodic MACT HH reports, Andeavor reported downtime for the control devices (flare (F-1) and combustor (C-2)) at the Wonsits Valley C.S. During approximately 55 hours from January 1, 2015 through June 30, 2019, SCADA data indicates that the glycol dehydrator (D-1) was operating but neither the flare (FL-1) nor the backup combustor (C-2) was operating. See Table 1, below, for details.

Table 1: Control Device Downtime at the Wonsits Valley C.S.

Reporting Period	Total Flare (FL-1) Downtime (hrs)	FL-1 Downtime (D-1 Operating) (hrs)		FL-1 Downtime (D-1 Down) (hrs)
		C-2 ON	C-2 OFF	
1/1/2015 - 6/30/2015	199.0	168.0	31.0	0.0
7/1/2015 - 12/31/2015	23.8	15.3	1.0	7.5
1/1/2016 - 6/30/2016	46.0	38.2	3.8	4.0
7/1/2016 - 12/31/2016	56.0	48.0	8.0	0.0
1/1/2017 - 6/30/2017	14.0	14.0	0.0	0.0
7/1/2017 - 12/31/2017	52.0	52.0	0.0	0.0
1/1/2018 - 6/30/2018	14.0	4.0	9.0	1.0
7/1/2018 - 12/31/2018	89.0	82.4	2.6	4.0
1/1/2019 – 6/30/2019	183.0	174.0	0.0	9.0

59. According to information provided by Andeavor to EPA on April 8, 2019, if both the flare (F-1) and backup combustor (C-2) are down and the dehydration unit (D-1) is still operating, emissions from D-1 are vented to the atmosphere and a timer tracks the duration of the bypass event.

60. MACT HH requires that control devices be operating at all times that emissions from the glycol dehydrator are routed to them (see 40 C.F.R. § 63.771(d)(4)(i)), and if a bypass

line is present, an excursion is deemed to have occurred when the emission stream is diverted away from the control device to the atmosphere (40 C.F.R. § 63.773(d)(6)(v)(A)).

61. Pursuant to 40 C.F.R. § 63.773(d)(7), "for each excursion, the owner or operator shall be deemed to have failed to have applied control in a manner that achieves the required operating parameter limits. Failure to achieve the required operating parameter limits is a violation of this standard."

62. During periods when D-1 was operating but neither the flare (FL-1) nor backup combustor (C-2) were operating, Andeavor failed to apply controls in a manner that achieved the required operating parameter limits, in violation of 40 C.F.R. §§ 63.773(d)(6)(v)(A) and 63.773(d)(7).

63. Pursuant to Paragraph II.B.4. of the Title V operating permit for the Wonsits Valley C.S. and 40 C.F.R. § 63.764(j), "the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions."

64. By not operating the flare or backup combustor at all times while the gylcol dehydrator (D-1) was operating, Andeavor failed and MPLX continues to fail to maintain good air pollution control practices to adequately control emissions from the glycol dehydrator and minimize emissions of HAPs to the atmosphere, in violation of the requirements at 40 C.F.R. § 63.764(j) and the facility's Title V operating permit.

MACT ZZZZ: Exceedances of CO Emission Standard at Chapita C.S.

65. Pursuant to Paragraph 15 of the federal consent decree, the Chapita C.S. is considered a major source of HAPs under MACT ZZZZ.

66. At the Chapita C.S., Andeavor operated and MPLX operates a Caterpillar G3606TALE 4SLB, natural gas-fired stationary reciprocating internal combustion engine (RICE) (Engine C200). Engine C200 is a 1,775 hp engine that was constructed after December 19, 2002. Pursuant to 40 C.F.R. § 63.6585, Engine C200 is subject to the requirements of MACT ZZZZ.

67. Pursuant to Paragraph III.C.2 of Title V operating permit (V-UO-000012-2018.00) for the Chapita C.S. and 40 C.F.R. § 63.6600(b), Engine C200 is subject to the emission limitations in Table 2a (#2) to MACT ZZZZ, which requires either: (1) CO emissions to be reduced by 93 percent or more; or (2) formaldehyde concentrations in the RICE exhaust to be 14 parts per million by volume, dry basis (ppmvd) or less at 15 percent O_2. Andeavor elected and MPLX elects to comply with MACT ZZZZ by using the CO reduction limitation option.

68. Andeavor used and MPLX uses oxidation catalysts to control CO emissions from Engine C200.

69. According to information provided by MPLX in a letter dated September 26,

2019, the catalyst on Engine C200 was replaced on July 18, 2019.

70. Pursuant to 40 C.F.R. § 63.6640(b), a performance test 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.

71. A performance test to demonstrate compliance with MACT ZZZZ was conducted by MPLX on Engine C200 on August 13, 2019. Results of the test indicated a CO reduction efficiency of 32 percent.

72. According to information provided by MPLX in a September 26, 2019 letter, the catalyst in Engine C200 was replaced and re-tested on September 24, 2019. The results of the performance test have not yet been received by EPA.

73. By failing to reduce CO emissions by 93 percent or more from Engine C200, MPLX violated and continues to violate the emission standards for CO in MACT ZZZZ and the provisions of Paragraph III.C.2 of Title V operating permit (V-UO-000012-2018.00) at the Chapita C.S.

MACT ZZZZ: Failure to Conduct Performance Tests after Catalyst Replacements at Wonsits Valley C.S. and Coyote Wash C.S.

74. Pursuant to Paragraph 15 of the federal consent decree, the Wonsits Valley C.S. is considered a major source of HAPs under MACT ZZZZ.

75. The Coyote Wash C.S. has the potential to emit 10 tpy or more of formaldehyde so is considered a major source of HAPs under MACT ZZZZ.

76. At the Wonsits Valley C.S., Andeavor operated and MPLX operates a Caterpillar G3616LE 4SLB, natural gas-fired, stationary RICE (Engine C207). Engine C207 is a 4,554 hp engine that was reconstructed in January 2014.

77. At the Coyote Wash C.S., Andeavor operated and MPLX operates a Caterpillar G3616LE 4SLB, natural gas-fired, stationary RICE (Engine C300). Engine C300 is a 4,588 hp engine that was constructed after December 19, 2002.

78. Paragraph III.C.2 of the Title V operating permit for the Wonsits Valley C.S. and Paragraph II.C.1 of the Title V operating permit for the Coyote Wash C.S. require that Engine C207 and Engine C300 comply with the emission limitations and operating limitations specified in § 63.6600.

79. Pursuant to 40 C.F.R. § 63.6600(b), Engine C207 and Engine C300 are subject to the emission limitations in Table 2a (#2) to MACT ZZZZ, which requires either: (1) CO emissions to be reduced by 93 percent or more; or (2) formaldehyde concentrations in the RICE exhaust to be 14 parts per million by volume, dry basis (ppmvd) or less at 15 percent O_2. Andeavor elected and MPLX elects to comply with MACT ZZZZ by using the CO reduction

limitation option.

80. Andeavor used and MPLX uses oxidation catalysts to control CO emissions from Engine C207 and Engine C300.

81. Pursuant to 40 C.F.R. § 63.6600(b), Engine C207 and Engine C300 are subject to the operating limitations in Table 2b (#1) to MACT ZZZZ, which requires: (1) the catalyst inlet temperature to be maintained at greater than or equal to 450 °F and less than or equal to 1,350 °F; and (2) the pressure drop across the catalyst to be maintained within plus or minus 2 inches of water at 100 percent load plus or minus 10 percent from the pressure drop across the catalyst that was measured during the initial performance test.

82. Pursuant to 40 C.F.R. § 63.6640(b), a performance test 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. MACT ZZZZ does not prescribe a deadline for conducting the test, but tests are expected to be conducted as soon as possible.[1]

83. Pursuant to Paragraph III.E.2 of the Title V operating permit for the Wonsits Valley C.S. and Paragraph II.E.2 of the Title V operating permit for the Coyote Wash C.S., Andeavor and MPLX must demonstrate continuous compliance with the requirements at § 63.6640.

84. On November 28, 2018, the catalyst on Engine C207 at the Wonsits Valley C.S. was replaced.

85. On December 7, 2018, a performance test was conducted on Engine C207. The test did not include a re-test of CO reduction efficiency to meet the testing requirements of MACT ZZZZ.

86. According to information provided by MPLX in a letter dated July 11, 2019, the catalyst on Engine C207 was replaced again on May 14, 2019.

87. On May 21, 2019 a performance test was conducted on Engine C207 to demonstrate compliance with MACT ZZZZ CO reduction efficiency requirements and to re-establish operating parameters. Results of the performance test were submitted to EPA on July 11, 2019, and indicated a CO reduction efficiency for Engine C207 of 97.7 percent.

88. On September 24, 2018, the catalyst on Engine C300 at the Coyote Wash C.S. was replaced.

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[1] See the answer to Question #22 on p. 7 of the "Implementation Question and Answer Document for National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines and New Source Performance Standards for Stationary Compression Ignition and Spark Ignition Internal Combustion Engines" (April 2, 2013).

89. On September 25, 2018, a performance test was conducted on Engine C300. The test did not include a re-test of CO reduction efficiency to meet the testing requirements of MACT ZZZZ.

90. On March 28, 2019, a performance test was conducted on Engine C300 to demonstrate compliance with MACT ZZZZ CO reduction efficiency requirements and to re-establish operating parameters. Results of the performance test were submitted to EPA on May 23, 2019 and indicated a CO reduction efficiency for Engine C300 of 96.6 percent.

91. By failing to conduct a performance test that met the testing requirements of MACT ZZZZ following the November 2018 catalyst replacement on Engine C207, Andeavor violated the MACT ZZZZ testing requirements at 40 C.F.R. § 63.6640(b), the MACT ZZZZ emissions limitations and operating limitations at 40 C.F.R. § 63.6600(b), and the requirements of Paragraphs III.C.2 and III.E.2 of the facility's Title V operating permit for the Wonsits Valley C.S.

92. By failing to conduct a performance test that met the testing requirements of MACT ZZZZ as soon as possible following the September 2018 catalyst replacement on Engine C300, Andeavor violated the MACT ZZZZ testing requirements at 40 C.F.R. § 63.6640(b), the MACT ZZZZ emissions limitations and operating limitations at 40 C.F.R. § 63.6600(b), and the requirements of Paragraphs II.C.1 and II.E.2 of the facility's Title V operating permit for the Coyote Wash C.S.

MACT ZZZZ: Failure to Timely Submit Performance Test Results for Engines at Wonsits Valley C.S, Coyote Wash C.S., Chapita C.S., and Island C.S.

93. Engines C202, C203, and C204 at the Wonsits Valley C.S. are 3,406 hp Caterpillar G3612LE 4SLB natural gas-fired RICE. Engine C206 at the Wonsits Valley C.S. is a 3,100 hp Waukesha 12V-AT27GL 4SLB natural gas-fired RICE. Engine C207 at the Wonsits Valley C.S. is a 4,554 hp Caterpillar G3616LE 4SLB natural gas-fired RICE. Pursuant to 40 C.F.R. § 63.6585, Engines C202, C203, C204, C206, and C207 are subject to the requirements of MACT ZZZZ.

94. Engines C100 and C200 at the Coyote Wash C.S. are 2,146 hp Caterpillar G3608LE 4SLB natural gas-fired RICE. Engines C300, C400, and C500 at the Coyote Wash C.S. are 4,588 hp Caterpillar G3616LE 4SLB natural gas-fired RICE. Pursuant to 40 C.F.R. § 63.6585, Engines C100, C200, C300, C400, and C500 are subject to the requirements of MACT ZZZZ.

95. Engines C100 and C200 at the Chapita C.S. are 1,775 hp Caterpillar G3606TALE 4SLB natural gas-fired RICE. Pursuant to 40 C.F.R. § 63.6585, Engines C100 and C200 are subject to the requirements of MACT ZZZZ.

96. Engine C100 at the Island C.S. is a 1,480 hp Waukesha L7042GSI 4-stroke rich-burn (4SRB) natural gas-fired RICE. Pursuant to § 63.6585, Engine C100 is subject to the requirements of MACT ZZZZ.

97. Pursuant to 40 C.F.R. § 63.7(g)(1), results of performance tests shall be submitted to the Administrator within 60 days of completion of the test.

98. Table 2, below, depicts the dates that Andeavor completed performance tests of Engines C202, C203, C204, C206, and C207 at the Wonsits Valley C.S., and the dates that the results of the performance tests were submitted to EPA:

Table 2. Wonsits Valley C.S. MACT ZZZZ Engine Performance Test and Submittal Dates

Engine ID	Date Performance Test Completed	Date Performance Test Submitted to EPA
C202	October 3, 2016	January 31, 2017
C202	November 29, 2017	January 29, 2018
C202	November 12, 2018	January 30, 2019
C203	October 5, 2016	January 31, 2017
C203	November 29, 2017	January 29, 2018
C203	November 13, 2018	January 30, 2019
C204	October 6, 2016	January 31, 2017
C204	November 27, 2017	January 29, 2018
C204	November 13, 2018	January 30, 2019
C206	October 5, 2016	January 31, 2017
C207	October 4, 2016	January 31, 2017
C207	November 28, 2017	January 29, 2018
C207	November 14, 2018	January 30, 2019

99. Table 3, below, depicts the dates that Andeavor completed performance tests of Engines C100, C200, C300, C400, and C500 at the Coyote Wash C.S., and the dates that the results of the performance tests were submitted to EPA:

Table 3: Coyote Wash C.S. MACT ZZZZ Engine Performance Test and Submittal Dates

Engine ID	Date Performance Test Completed	Date Performance Test Submitted to EPA
C100	August 9, 2016	January 31, 2017
C100	July 25, 2018	January 31, 2019
C200	August 9, 2016	January 31, 2017
C200	July 25, 2018	January 31, 2019
C300	August 8, 2016	January 31, 2017
C300	September 12, 2017	January 31, 2018
C300	March 27, 2018	August 1, 2018
C400	August 10, 2016	January 31, 2017
C400	September 13, 2017	January 31, 2018
C400	March 29, 2018	August 1, 2018
C500	August 8, 2016	January 31, 2017
C500	September 14, 2017	January 31, 2018
C500	March 28, 2018	August 1, 2018

100. Table 4, below, depicts the dates that Andeavor completed performance tests of Engines C100 and C200 at the Chapita C.S., and the dates that the results of the performance tests were submitted to EPA:

Table 4: Chapita C.S. MACT ZZZZ Engine Performance Test and Submittal Dates

Engine ID	Date Performance Test Completed	Date Performance Test Submitted to EPA
C100	October 26, 2016	January 24, 2017
C100	July 24, 2018	January 31, 2019
C200	October 25, 2016	January 24, 2017
C200	July 28, 2018	January 31, 2019

101. On November 2, 2018, Andeavor completed a performance test on Engine C100 at the Island C.S. On January 30, 2019, Andeavor submitted results of the November 2, 2018 performance test on Engine C100 to EPA.

102. As provided in Tables 2 through 4 and Paragraph 93, above, Andeavor failed to submit the results of the October 2016, November 2017, and November 2018 MACT ZZZZ performance tests at the Wonsits Valley C.S., the August 2016, September 2017, March 2018, and July 2018 MACT ZZZZ performance tests at the Coyote Wash C.S., the October 2016 and July 2018 MACT ZZZZ performance tests at the Chapita C.S., and the November 2018 MACT ZZZZ performance test at the Island C.S. within 60 days of completion of the tests; therefore, Andeavor violated the reporting requirements at 40 C.F.R. § 63.7(g)(1).

NSPS JJJJ: Exceedances of VOC Emission Standard at Wonsits Valley C.S.

103. Engine C207 at the Wonsits Valley C.S. is a spark ignition (SI), internal combustion engine (ICE) that was reconstructed in January 2014 and has a maximum engine power greater than or equal to 500 hp.

104. Pursuant to 40 C.F.R. § 60.4230(a)(5), Engine C207 is subject to NSPS JJJJ.

105. Pursuant to Paragraph IV.C.1 of the Title V operating permit for the Wonsits Valley C.S. and 40 C.F.R. §§ 60.4233(f)(4) and (e), Engine C207 is subject to the emission standards in Table 1 to NSPS JJJJ for non-emergency SI natural gas engines with greater than or equal to 500 hp, which were manufactured on or after July 1, 2010. Those emission standards are: 1.0 grams per horsepower hour (g/hp-hr) NO_X, 2.0 g/hp-hr CO, and 0.7 g/hp-hr VOC.

106. Pursuant to 40 C.F.R. §§ 60.4244(c) and 60.8(f), performance tests shall consist of three separate test runs.

107. A performance test to demonstrate compliance with NSPS JJJJ was conducted by Andeavor on Engine C207 on November 14, 2018. Results of the first test run indicated VOC emissions of 1.14 g/hp-hr, in excess of the NSPS JJJJ VOC emission standards, and the test was stopped after one test run.

108. Since only one test run was conducted during the November 14, 2018 testing, the performance test did not meet the requirements for performance tests at 40 C.F.R. §§ 60.4244(c) and 60.8(f).

109. Pursuant to 40 C.F.R. § 60.11(g), "for purposes of establishing whether or not a person has violated or is in violation of any standard in this part, nothing in this part shall preclude the use, including 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...had been performed."

110. For purposes of determining compliance with the NSPS JJJJ VOC emission standards, the results of the test run performed on Engine C207 on November 14, 2018 are credible evidence.

111. A performance test to demonstrate compliance with NSPS JJJJ was conducted by Andeavor on Engine C207 on November 21, 2018. Results of the test indicated VOC emissions of 1.10 g/hp-hr, in excess of the NSPS JJJJ VOC emission standards.

112. A performance test to demonstrate compliance with NSPS JJJJ was conducted by Andeavor on Engine C207 on December 7, 2018. Results of the test indicated VOC emissions of 0.41 g/hp-hr, in compliance with the NSPS JJJJ VOC emission standards.

113. By emitting VOC from Engine C207 in excess of 0.7 g/hp-hr, Andeavor violated the emission standards for VOC in NSPS JJJJ and the provisions of Paragraph IV.C.2 of Title V

operating permit at the Wonsits Valley C.S.

NSPS JJJJ: Failure to Timely Submit Performance Test Results at Coyote Wash C.S. and Wonsits Valley C.S.

114. At the Coyote Wash C.S., Andeavor operated and MPLX operates a Caterpillar G3616LE 4SLB, natural gas-fired, SI ICE (Engine C500). Engine C500 is a 4,588 hp engine that was constructed after June 12, 2006 and manufactured after July 1, 2007.

115. Pursuant to 40 C.F.R. § 60.4230(a)(4)(i), Engine C500 at the Coyote Wash C.S. is subject to NSPS JJJJ.

116. At the Wonsits Valley C.S., Andeavor operated and MPLX operates engines C202, C203, C204, C206, and C207, which are spark ignition (SI), internal combustion engines (ICE). Engines C202, C203, C204, C206, and C207 were reconstructed after June 12, 2006.

117. Pursuant to 40 C.F.R. § 60.4230(a)(5), Engines C202, C203, C204, C206, and C207 at the Wonsits Valley C.S. are subject to NSPS JJJJ.

118. Pursuant to 40 C.F.R. § 60.4245(d), results of performance tests shall be submitted to the Administrator within 60 days of completion of the test.

119. Table 5, below, depicts the dates that Andeavor completed performance tests of Engine C500 at the Coyote Wash C.S., and the dates that the results of the performance tests were submitted to EPA:

Table 5: Coyote Wash C.S. NSPS JJJJ Engine Performance Test and Submittal Dates

Engine ID	Date Performance Test Completed	Date Performance Test Submitted to EPA
C500	August 8, 2016	January 31, 2017
C500	September 14, 2017	January 29, 2018

120. Table 6, below, depicts the dates that Andeavor completed performance tests of Engines C202, C203, C204, C206, and C207 at the Wonsits Valley C.S., and the dates that the results of the performance tests were submitted to EPA:

Table 6: Wonsits Valley C.S. NSPS JJJJ Engine Performance Test and Submittal Dates

Engine ID	Date Performance Test Completed	Date Performance Test Submitted to EPA
C202	May 6, 2016	July 20, 2016
C202	May 17, 2017	July 28, 2017
C202	May 22, 2018	August 2, 2018
C203	April 25, 2016	July 20, 2016
C203	May 17, 2017	July 28, 2017
C203	May 21, 2018	August 2, 2018
C204	April 25, 2016	July 20, 2016
C204	May 15, 2017	July 28, 2017
C204	May 22, 2018	August 2, 2018
C206	April 27, 2016	July 20, 2016
C206	May 15, 2017	July 28, 2017
C207	April 26, 2016	July 20, 2016
C207	May 16, 2017	July 28, 2017
C207	November 14, 2018	January 30, 2019
C207	November 21, 2018	February 21, 2019

121. As provided in Tables 5 and 6, above, Andeavor failed to submit the results of the August 2016 and September 2017 NSPS JJJJ performance tests at the Coyote Wash C.S. and the April 2016, May 2016, May 2017, May 2018, and November 2018 NSPS JJJJ performance tests at the Wonsits Valley C.S. within 60 days of completion of the tests; therefore, Andeavor violated the reporting requirements at 40 C.F.R. § 60.4245(d).

Title V: Exceedance of NO_X Emission Limit at Coyote Wash C.S.

122. On December 2, 2013, EPA issued a Title V permit (V-UO-000015-2006.00) to QEPFS (a predecessor of Andeavor) for the Coyote Wash C.S. The permit was effective at all times relevant to this NOV. Section IV.B.2(b)(ii)(D)(1) of the Title V permit for the Coyote Wash C.S. requires Engine C400 to meet a nitrogen oxide (NO_X) emission limit of 1.0 g/hp-hr, as demonstrated through semi-annual performance testing.

123. On January 29, 2018, Andeavor submitted to EPA the results of a September 13, 2017 performance test on Engine C400. Engine C400 has a dual exhaust stack, and results of the performance test were reported separately for each exhaust bank ("Left Exhaust Bank" and "Right Exhaust Bank").

124. Results of the September 13, 2017, performance test on Engine C400 indicated combined stack emissions of 1.1 g/hp-hr NO_X (0.570 g/hp-hr from the "Left Exhaust Bank" and 0.513 g/hp-hr from the "Right Exhaust Bank"), which exceeds the permit limit of 1.0 g/hp-hr.

125. By emitting NO_X in excess of 1.0 g/hp-hr from Engine 400, Andeavor violated the emission limits set forth for Engine C400 in the Title V permit for the Coyote Wash C.S.

III. ENVIRONMENTAL IMPACT OF VIOLATIONS

126. These violations have caused excess emissions of volatile organic compounds and nitrogen oxides. Volatile organic compounds and nitrogen oxides contribute to ozone formation which can result in adverse effects to human health and vegetation. Ozone can penetrate different regions of the respiratory tract and be absorbed through the respiratory system. Repeated exposure may permanently scar lung tissue.

127. These violations have caused or can cause excess emissions of hazardous air pollutants. Hazardous air pollutant emissions can lead to adverse health effects such as cancer, respiratory irritation, and damage to the nervous system.

IV. ENFORCEMENT

128. Pursuant to Section 113(b) of the Act, 42 U.S.C. § 7413(b), MPLX may be liable for injunctive relief and civil penalties of up to $37,500 per day for each violation occurring between January 13, 2009, and November 2, 2015, and up to $99,681 per day for each violation occurring on or after November 3, 2015, and assessed on or after February 6, 2019. *See* 40 C.F.R. § 19.4; 84 Fed. Reg. 2056 (Feb. 6, 2019).

Date Issued: 11/21/19

Suzanne J. Bohan, Director
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