

Fact Sheet



For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on October 25, 2016.

Permit Number: **R30-10300042-2016**
Application Received: **August 28, 2018**
Plant Identification Number: **03-54-103-00042**
Permittee: **MarkWest Liberty Midstream & Resources LLC**
Facility Name: **Mobley Gas Plant**
Mailing Address: **1515 Arapahoe Street, Tower 1, Suite 1600**
Denver, CO 80202-2137

Permit Action Number: *MM03* Revised: *March 29, 2019*

Physical Location:	Smithfield, Wetzel County, West Virginia
UTM Coordinates:	538.099 km Easting • 4,378.315 km Northing • Zone 17
Directions:	From Smithfield, head southwest on County Road 2/1/Mannington Road toward WV 20S. Turn right at WV 20N and go 1.1 miles. Take the first right onto County Road 7/8/Fallen Timber Run Road and go 2.8 miles. Continue onto County Road 80/Fallen Timber Road/Shuman Hill for 0.8 miles. Turn right at County Road 80/Shuman Hill and go 1.5 miles. Turn right at County Road 15/North Fork Road and go 2.8 miles. The site will be on the left.

Facility Description

The Mobley Gas Plant is a gas processing plant and compressor station to process field gas from nearby wells. Natural gas from the surrounding wells enter the facility and undergoes separation, filtration, and dehydration. Separation serves to remove any free liquids entrained in the gas. Filtration serves to remove any impurities. Dehydration removes any additional moisture remaining in the gas prior to processing. The gas is subsequently sent through a cryogenic process which serves to remove any natural gas liquids (propane and heavier components) from the gas stream. At this point the gas is saleable and is compressed prior to leaving the facility via pipeline. The natural gas liquids are transported offsite via pipeline.

This modification is to correct several administrative discrepancies in the existing permit. These changes were approved under R13-2878G.

Emissions Summary

There are no changes to emissions as a result of this modification.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 118.53 tons per year of NOx. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, MarkWest Liberty Midstream & Resources LLC is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	To Prevent And Control Particulate Air Pollution from Combustion Of Fuel In Indirect Heat Exchangers.
	45CSR10	To Prevent And Control Air Pollution from The Emission Of Sulfur Oxides
	45CSR13	NSR Permits.
	45CSR30	Operating permit requirement.
State Only:	None.	

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2878G	October 12, 2018	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

The following changes were made with this minor modification:

Section 1.1 Emission Units

- Changed the Emission Unit IDs and Emission Point IDs for CM-1001, H-741, H-781 and H-5781 to CM-1002, H-2741, H-2781 and H-5782 respectively to match their plant designations.

Section 4.0 Source Specific Requirements Compressor Engines

- Changed CM-1001 to CM-1002 in the section title and Conditions 4.1.1, 4.3.1, and 4.4.3.

Section 5.0 Source Specific Requirements Process Heaters

- Updated conditions 5.1.1, 5.1.2, and 5.1.5, in accordance with the changes made in the emission units table in Section 1.1 and R13-2878G conditions 5.1.1, 5.1.2 and 5.1.4.
- Deleted and reserved condition 5.1.3 since all the heaters are considered fuel burning units, none would be subject to Rule 10 for manufacturing process units.

Section 9.0 Source-Specific Requirements (Blowdown Operations)

- Removed section 9.1.1 because facility blowdowns are routed to the flare and the gas throughput from blowdowns is included in condition 6.1.3.g.
- Changed sections 9.1.3 and 9.1.4 to remove references to “36 events/compressor, with an estimated 2,200 scf per event.”
- Amended sections 9.1.3, 9.1.4, and 9.1.5 to clarify that the events referenced in those conditions are routed to the atmosphere.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

None.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: Not Applicable for minor modifications.
Ending Date: N/A

Point of Contact

All written comments should be addressed to the following individual and office:

Robert Mullins
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1243 • Fax: 304/926-0478
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Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

Updated the US EPA mailing address in condition 3.5.3.