

Dickson, Laura

From: Dickson, Laura
Sent: Thursday, July 21, 2022 2:06 PM
To: Juarez, Allie M.
Cc: Orris, Edward
Subject: Administrative Completeness Determination (PA-63-01011)
Attachments: PA-63-01011 Administrative Completeness Letter.pdf

Hi Allie,

The Department of Environmental Protection has reviewed the Plan Approval Application for the Harmon Creek Gas Plant located in Smith Township, Washington County for administrative completeness. Please find the determination letter attached.

Thank you!

Laura S. Dickson, EIT | Environmental Engineering Specialist *She/her/hers*
Pennsylvania Department of Environmental Protection
Southwest Regional Office
400 Waterfront Drive | Pittsburgh, PA 15222
Phone: 412.442.4155
www.depweb.state.pa.us

DEP is now accepting permit and authorization applications, as well as other documents and correspondence, electronically through the OnBase Electronic Forms Upload tool. Please use the link below to view the webpage, get instructions, and submit documents:

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July 21, 2022

Allie Juarez, G&P Engineer I
Via email at: AJuarez@marathonpetroleum.com
MarkWest Liberty Midstream and Resources, L.L.C.
4600 J Barry Court, Suite 500
Canonsburg, PA 15317

Re: Administrative Completeness Review
Application No. PA-63-01011
MarkWest Liberty Midstream and Resources, L.L.C. – Harmon Creek Gas Plant
Smith Township, Washington County

Dear Allie Juarez:

On June 29, 2022, the Department of Environmental Protection (Department) received your Plan Approval application for the above referenced facility. Thank you for your submittal.

The Department has reviewed your Plan Approval application for administrative completeness and has determined the application to be administratively complete pursuant to 25 Pa. Code §127.12d, meaning that it contains information, maps, fees, and other documents requested in the plan approval application regardless of whether the information, maps, and documents would be sufficient to justify the issuance of a plan approval.

Although your application is accepted as administratively complete, it is possible that additional information may be required for the Department's technical review of your application. The Department will notify you prior to formally drafting your Plan Approval. You may amend your plan approval application to incorporate any changes at your facility until your permit has been drafted.

If you have any questions regarding this matter, please feel free to contact me by email at ldickson@pa.gov or by phone at 412.442.4155.

Sincerely,

Laura S. Dickson/LSD

Laura S. Dickson
Environmental Engineering Specialist
Air Quality Program

CC: File: 63-936 NSR (Ed Orris) Operations (A. Hensel) Harrisburg C.O. (Permits)

Dickson, Laura

From: Dickson, Laura
Sent: Thursday, July 14, 2022 4:33 PM
To: Juarez, Allie M.
Subject: RE: [EXTERNAL] Administrative Incompleteness Determination (PA-63-01011)

Thank you, Allie. That's all that's needed for now. If I have further questions, I'll be in touch.

Best Regards,

Laura S. Dickson, EIT | Environmental Engineering Specialist *She/her/hers*
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From: Juarez, Allie M. <AJuarez@marathonpetroleum.com>
Sent: Thursday, July 14, 2022 9:10 AM
To: Dickson, Laura <ldickson@pa.gov>
Cc: Orris, Edward <eorris@pa.gov>
Subject: RE: [EXTERNAL] Administrative Incompleteness Determination (PA-63-01011)

Good morning Laura,

The maintenance schedule for the flare is conducted on an as-needed basis through annual third-party inspections. The inspections include all parts of the process that would increase air emissions if in disrepair. Please let me know if there is any other information you need regarding the maintenance schedule.

Thanks,
Allie

From: Dickson, Laura <ldickson@pa.gov>
Sent: Wednesday, July 13, 2022 4:17 PM
To: Juarez, Allie M. <AJuarez@marathonpetroleum.com>
Cc: Orris, Edward <eorris@pa.gov>
Subject: RE: [EXTERNAL] Administrative Incompleteness Determination (PA-63-01011)

Good Afternoon Allie,

Thank you for providing this information. The only outstanding observation is the maintenance schedule for the control equipment and any part of the process equipment that if in disrepair would increase air contaminant emissions.

Best Regards,

Laura S. Dickson, EIT | Environmental Engineering Specialist *She/her/hers*
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From: Juarez, Allie M. <AJuarez@marathonpetroleum.com>
Sent: Wednesday, July 13, 2022 4:09 PM
To: Dickson, Laura <ldickson@pa.gov>
Cc: Orris, Edward <eorris@pa.gov>
Subject: RE: [EXTERNAL] Administrative Incompleteness Determination (PA-63-01011)

Good afternoon, Laura,

Please find MPLX's response below to the technical observations noted in the administrative incompleteness letter and the methanol questionnaire attached.

- Third-party inspections are conducted on the flare annually, and follow-up maintenance is performed if needed.
- The revised table for Section E - Compliance Demonstration of the Plan Approval Application Form follows:

Component Type	Monitoring Frequency	Detection Level (PPMV)
Compressor	Quarterly/Annually	10,000 (OGI) / 500
Connector	Quarterly/Annually	10,000 (OGI) / 500
Pressure Relief	Quarterly	500
Valve	Quarterly	500
Pump	Monthly	500

Please let me know if you need any additional information.

Thank you,
Allie



Allie Juarez
G&P Engineer I
4600 J Barry Court, Suite 500
Canonsburg, PA 15317
Mobile: 412-815-8886
ajuarez@marathonpetroleum.com

From: Dickson, Laura <ldickson@pa.gov>
Sent: Friday, July 8, 2022 3:07 PM

To: Juarez, Allie M. <AJuarez@marathonpetroleum.com>

Cc: Orris, Edward <eorris@pa.gov>

Subject: [EXTERNAL] Administrative Incompleteness Determination (PA-63-01011)

Good Afternoon Allie,

The Department has reviewed the application for a Plan Approval at the Harmon Creek Gas Plant located in Smith Township, Washington County, for administrative completeness. Please find the attached determination letter and provide the requested information **within 10 business days** of your receipt of this email.

Thank you,

Laura S. Dickson, EIT | Environmental Engineering Specialist *She/her/hers*
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Good morning Laura,

The maintenance schedule for the flare is conducted on an as-needed basis through annual third-party inspections. The inspections include all parts of the process that would increase air emissions if in disrepair. Please let me know if there is any other information you need regarding the maintenance schedule.

Thanks,
Allie

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Best Regards,

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Good afternoon, Laura,

Please find MPLX's response below to the technical observations noted in the administrative incompleteness letter and the methanol questionnaire attached.

- Third-party inspections are conducted on the flare annually, and follow-up maintenance is performed if needed.
- The revised table for Section E - Compliance Demonstration of the Plan Approval Application Form follows:

Component Type	Monitoring Frequency	Detection Level (PPMV)
Compressor	Quarterly/Annually	10,000 (OGI) / 500
Connector	Quarterly/Annually	10,000 (OGI) / 500
Pressure Relief	Quarterly	500
Valve	Quarterly	500
Pump	Monthly	500

Please let me know if you need any additional information.

Thank you,
Allie



Allie Juarez
G&P Engineer I
4600 J Barry Court, Suite 500
Canonsburg, PA 15317
Mobile: 412-815-8886
ajuarez@marathonpetroleum.com

From: Dickson, Laura <ldickson@pa.gov>
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To: Juarez, Allie M. <AJuarez@marathonpetroleum.com>
Cc: Orris, Edward <eorris@pa.gov>
Subject: [EXTERNAL] Administrative Incompleteness Determination (PA-63-01011)

Good Afternoon Allie,

The Department has reviewed the application for a Plan Approval at the Harmon Creek Gas Plant located in Smith Township, Washington County, for administrative completeness. Please find the attached determination letter and provide the requested information **within 10 business days** of your receipt of this email.

Thank you,

Laura S. Dickson, EIT | Environmental Engineering Specialist *She/her/hers*
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Standard Questions Pertaining to Methanol Use

1. Will your facility use methanol for de-icing or as an antifreeze in the natural gas conveyance and/or treatment process? [25 Pa. Code §127.12(a)(2)]

Yes.

2. Will your facility receive any natural gas that will have methanol in it? [25 Pa. Code §127.12(a)(2)]

Based on the gas analysis provided to the Department on 6/16/2021, methanol was not present in detectable quantities in the facility inlet stream.

If “no” to 1 and 2, disregard remaining questions. If “yes” to either 1 or 2, please answer the remaining questions.

3. What will be the total volume of methanol used per calendar year at the facility? [25 Pa. Code §127.12(a)(2)]

No greater than 5 gallons of methanol is used per year currently and MPLX assumes the volume may double to account for Harmon Creek II.

4. What will be the total volume of methanol used per calendar year for each well that will send gas to the facility? [25 Pa. Code §127.12(a)(2)]

Based upon analytical data, methanol was non-detect in the inlet stream in 2021.

5. Is the methanol used continuously throughout the year or seasonally? Please explain. [25 Pa. Code §127.12(a)(2)]

Methanol is used periodically throughout the year as needed. The same is expected for Harmon Creek II.

6. Where is the methanol injected into the system? If at the facility, please identify each injection point in your process flow diagram. [25 Pa. Code §127.12(a)(2)]

Methanol will continue to be injected from the injection pump upstream of the DeMethanizer, thus incorporating methanol into the plant process.

7. Please account for the final disposition of the methanol at your facility. Examples would include methanol contained in collected wastewater (produced water, or “slop tank”), remaining in the dried natural gas, contained in the rich glycol, and contained in the glycol sent to the reboiler. [25 Pa. Code §127.12(a)(2)]

The final disposition of the methanol at the facility is in the amine closed drain or Y-grade product pipeline.

8. Please quantify your facility’s annual methanol emissions including any fugitive emissions and stack emissions, e.g., flash tank and reboiler vents. Be sure to include the calculations and supporting documentation. [25 Pa. Code §127.12(a)(2)]

Please see Detailed Emission Estimates provided in the Plan Approval application.

Dickson, Laura

From: Juarez, Allie M. <AJuarez@marathonpetroleum.com>
Sent: Monday, July 11, 2022 3:07 PM
To: Dickson, Laura
Cc: Orris, Edward
Subject: RE: [EXTERNAL] Administrative Incompleteness Determination (PA-63-01011)
Attachments: 2022-0711 Aerial View Plant.pdf

Good afternoon, Laura,

Please find the requested aerial view of the Harmon Creek Gas Plant attached. I am compiling information for the technical observations noted in your administrative completeness letter and will follow up with that information at a later date.

Thank you,
Allie

From: Dickson, Laura <ldickson@pa.gov>
Sent: Friday, July 8, 2022 3:07 PM
To: Juarez, Allie M. <AJuarez@marathonpetroleum.com>
Cc: Orris, Edward <eorris@pa.gov>
Subject: [EXTERNAL] Administrative Incompleteness Determination (PA-63-01011)

Good Afternoon Allie,

The Department has reviewed the application for a Plan Approval at the Harmon Creek Gas Plant located in Smith Township, Washington County, for administrative completeness. Please find the attached determination letter and provide the requested information **within 10 business days** of your receipt of this email.

Thank you,

Laura S. Dickson, EIT | Environmental Engineering Specialist *She/her/hers*
Pennsylvania Department of Environmental Protection
Southwest Regional Office
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Phone: 412.442.4155
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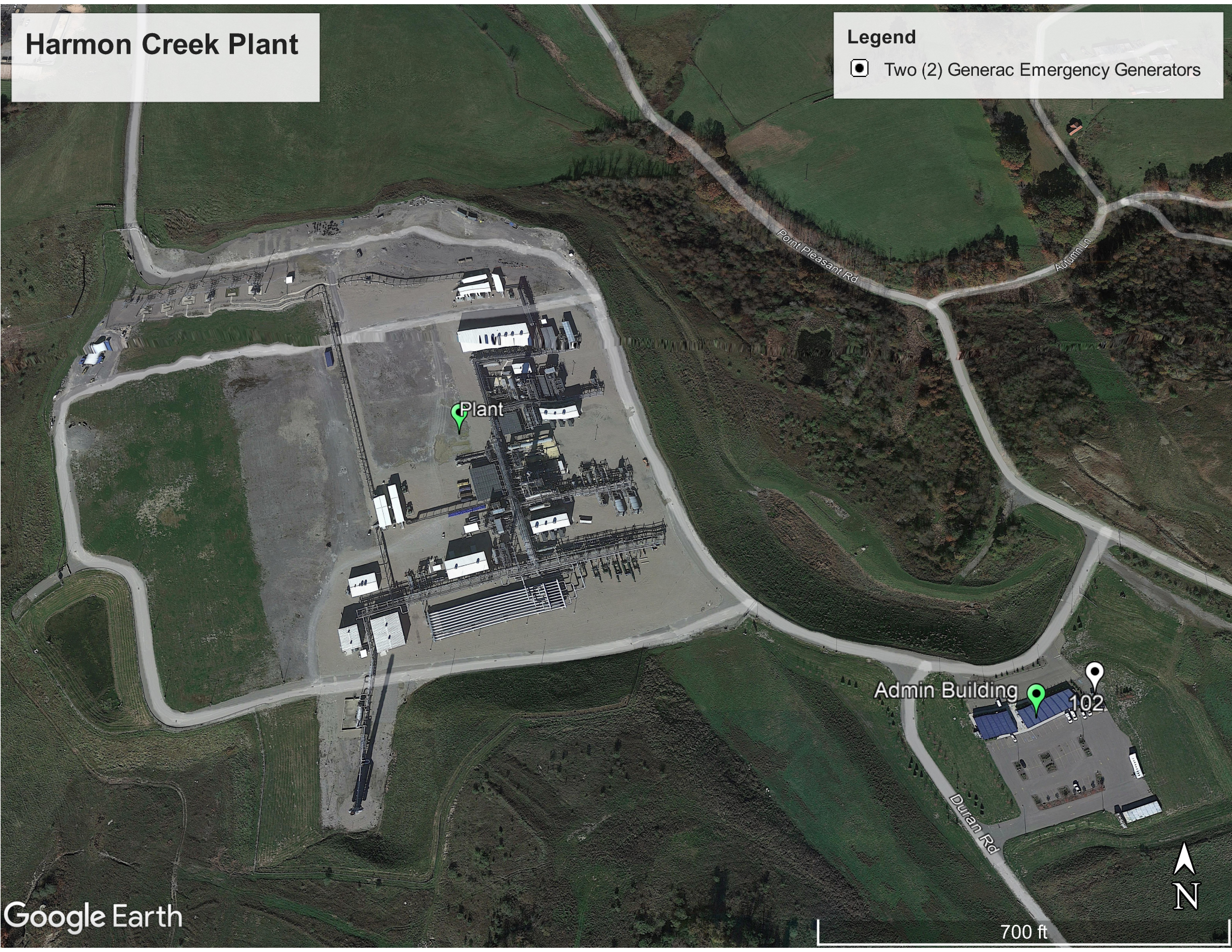
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Harmon Creek Plant

Legend

Two (2) Generac Emergency Generators

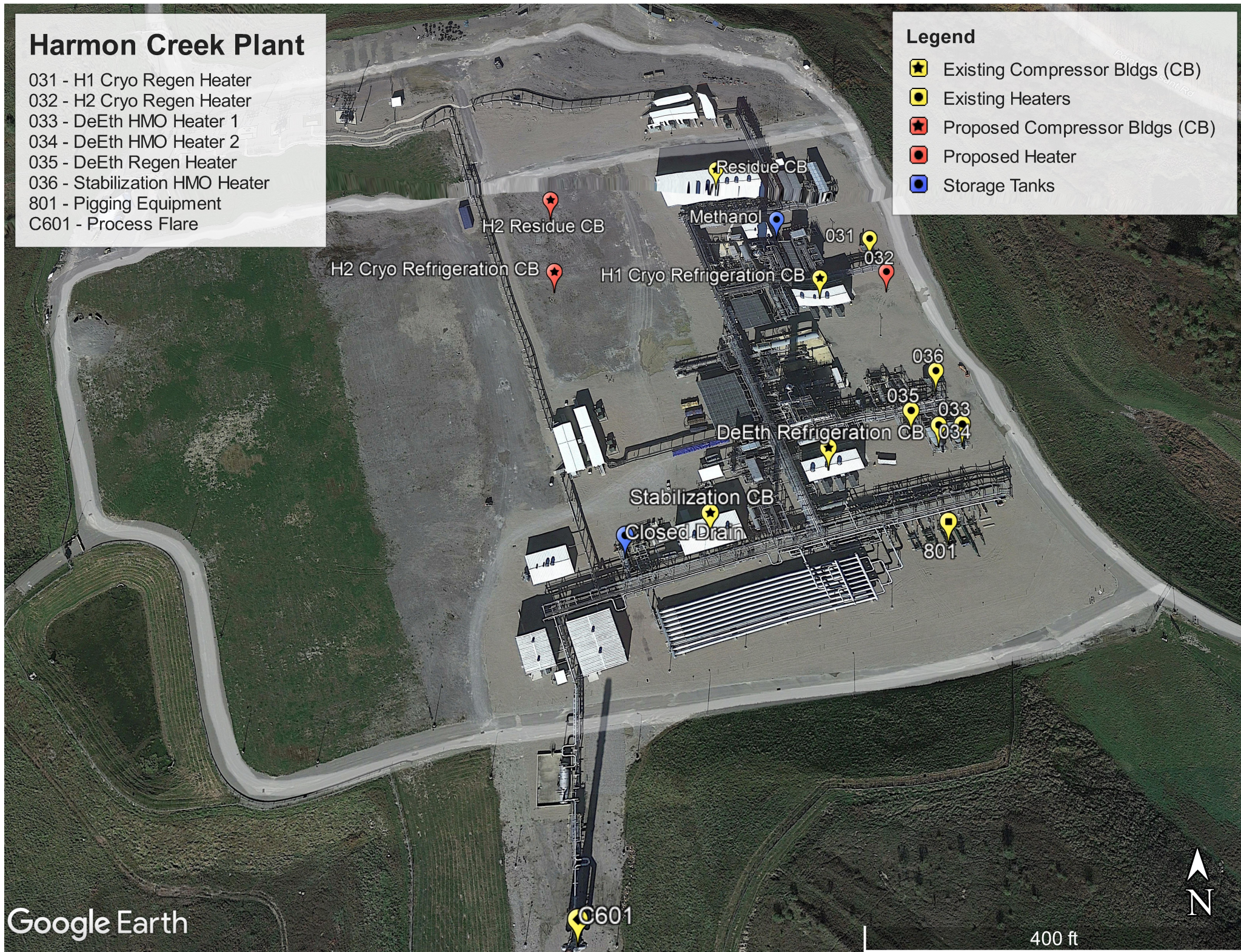


Harmon Creek Plant

031 - H1 Cryo Regen Heater
032 - H2 Cryo Regen Heater
033 - DeEth HMO Heater 1
034 - DeEth HMO Heater 2
035 - DeEth Regen Heater
036 - Stabilization HMO Heater
801 - Pigging Equipment
C601 - Process Flare

Legend

- Existing Compressor Bldgs (CB)
- Existing Heaters
- Proposed Compressor Bldgs (CB)
- Proposed Heater
- Storage Tanks



Dickson, Laura

From: Dickson, Laura
Sent: Friday, July 8, 2022 3:07 PM
To: Juarez, Allie M.
Cc: Orris, Edward
Subject: Administrative Incompleteness Determination (PA-63-01011)
Attachments: PA-63-01011 Administrative Incompleteness Letter.pdf

Good Afternoon Allie,

The Department has reviewed the application for a Plan Approval at the Harmon Creek Gas Plant located in Smith Township, Washington County, for administrative completeness. Please find the attached determination letter and provide the requested information **within 10 business days** of your receipt of this email.

Thank you,

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July 8, 2022

Allie Juarez, G&P Engineer I
Via email at: AJuarez@marathonpetroleum.com
MarkWest Liberty Midstream and Resources, L.L.C.
4600 J Barry Court, Suite 500
Canonsburg, PA 15317

Re: Administrative Incompleteness Determination
Application No. PA-63-01011
MarkWest Liberty Midstream and Resources, L.L.C. – Harmon Creek Gas Plant
Smith Township, Washington County

Dear Allie Juarez:

On June 29, 2022, the Department of Environmental Protection (Department) received the above referenced application for a new Plan Approval for the Harmon Creek Gas Plant located in Smith Township, Washington County. The Department has determined the application is administratively incomplete. Please provide the following additional information **within 10 business days**, pursuant to 25 Pa. Code § 127.12d(c), to avoid the application and fees being returned to you:

- Please provide an aerial view of the facility showing the property outline and location of emission points. [25 Pa. Code §127.12(a)(2)]

In addition to the administratively incomplete comment above, please be aware of the following technical observations that were noticed during the administrative completeness review. Please note that the following technical comments are not subject to the 10 business day deadline and are not part of the administrative incompleteness determination. These are solely included in this letter to aid in the efficiency of the review. I kindly request a response to these questions within 30 days.

- Please provide a response to Plan Approval Section C requirement: *“Attach the maintenance schedule for the control equipment and any part of the process equipment that if in disrepair would increase air contaminant emissions.”* [25 Pa. Code §127.12(a)(2)]
- The Department observed fugitive component detection levels (related to pumps) higher than 500 ppm. The Department’s definition of a leak, (per document: 2700-PM-BAQ0267), is: *“any release of gaseous hydrocarbons that is detected by Auditory, Visual, or Olfactory (AVO) inspection; an optical gas imaging (OGI) camera calibrated according to 40 CFR § 60.18 and a detection sensitivity level of 60 grams/hour; a gas leak detector that meets the requirements of 40 CFR Part 60, Appendix A-7, Method 21 that detects a concentration of 500 ppm calibrated as methane or greater; or other leak detection methods approved by the Department’s Division of Source Testing and Monitoring.”* Please provide a revised table ensuring that the pump detection level will be 500 ppm. [25 Pa. Code §127.12(a)(2)]

- Please respond to the standard methanol questionnaire (below) that the Department requests for each submittal within natural gas industry:

Standard Questions Pertaining to Methanol Use

- Will your facility use methanol for de-icing or as an antifreeze in the natural gas conveyance and/or treatment process? [25 Pa. Code §127.12(a)(2)]
- Will your facility receive any natural gas that will have methanol in it? [25 Pa. Code §127.12(a)(2)]

If “no” to 1 and 2, disregard remaining questions. If “yes” to either 1 or 2, please answer the remaining questions.

- What will be the total volume of methanol used per calendar year at the facility? [25 Pa. Code §127.12(a)(2)]
- What will be the total volume of methanol used per calendar year for each well that will send gas to the facility? [25 Pa. Code §127.12(a)(2)]
- Is the methanol used continuously throughout the year or seasonally? Please explain. [25 Pa. Code §127.12(a)(2)]
- Where is the methanol injected into the system? If at the facility, please identify each injection point in your process flow diagram. [25 Pa. Code §127.12(a)(2)]
- Please account for the final disposition of the methanol at your facility. Examples would include methanol contained in collected wastewater (produced water, or “slop tank”), remaining in the dried natural gas, contained in the rich glycol, and contained in the glycol sent to the reboiler. [25 Pa. Code §127.12(a)(2)]
- Please quantify your facility’s annual methanol emissions including any fugitive emissions and stack emissions, e.g., flash tank and reboiler vents. Be sure to include the calculations and supporting documentation. [25 Pa. Code §127.12(a)(2)]

If you have any questions about your application, please contact me, Laura Dickson, by phone at 412.442.4155 or by email at ldickson@pa.gov or Mr. Ed Orris by phone at 412.442.4168 or by email at eorris@pa.gov and refer to Application No. PA-63-01011. You may also follow your application through the review process via eFACTS on the Web at: <https://www.ahs.dep.pa.gov/eFACTSWeb/default.aspx>.

Sincerely,

Laura S. Dickson/LSD

Laura S. Dickson
Environmental Engineering Specialist
Air Quality Program

CC: File: 63-1011 NSR (Ed Orris) Operations (Anna Hensel) Harrisburg C.O. (Permits)