



Pennsylvania
**Department of
Environmental Protection**

MEMO

TO Air Quality Permit File **OP-63-01011**

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THROUGH Thomas J. Joseph, P.E. /TJJ
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DATE May 18, 2026

RE Comment & Response Document of Natural Minor State-Only Operating Permit Application
MarkWest Liberty Midstream & Resources, L.L.C.
Harmon Creek Natural Gas Processing Plant
Smith Township
Washington County

APS 1128592 AUTH 1511817 PF 819388

Comment & Response Document:

MarkWest Liberty Midstream & Resources, L.L.C. (“MarkWest”) owns and operates the Harmon Creek Natural Gas Processing Plant (“Harmon Creek”) located at 123 Point Pleasant Road, Bulger, PA 15019 in Smith Township, Washington County (40.403856, -80.358359). The plant was first authorized for construction, installation, and operation on January 18, 2018, concurrently under GP5-63-01011, GP1-63-01011A, and RFD-63-01011A. The facility is currently permitted under plan approval PA-63-01011, plan approval PA-63-01011B, and general permit GP5-63-01011B.

This facility receives and processes dehydrated “wet” natural gas from upstream gathering stations. Gas processing operations at Harmon Creek include extracting natural gas liquids (NGLs) from field gas and partial fractionation of mixed NGLs into natural gas products using stabilization, cryogenic separation, and de-ethanization fractionation to produce residue gas, condensate, NGLs, and purity ethane.

On January 3, 2025, the Department received a state-only operating permit application for this facility. The purpose of this review is to consolidate existing permitting requirements from one of the currently authorized plan approvals and the general operating permit into a state-only operating permit. Specifically, this review will consolidate plan approval PA-63-01011 and general permit GP5-63-01011B into one (1) natural minor state-only operating permit (SOOP) and excludes incorporating plan approval PA-63-01011B since construction activities are still ongoing at this time. This state-only operating permit review does not establish best available technology standards nor authorize any new equipment at the facility.

On March 7, 2026, the Department published a notice of intent to issue an initial state-only operating permit to this facility in the *Pennsylvania Bulletin* in accordance with 25 Pa. Code §127.424(a), (d), and (e). The public comment period ended on April 6, 2026.

Various comments were received from non-governmental organizations, the corporation subject to this proposed operating permit, and residents of the Commonwealth and other States throughout the public comment period. Comments received after the close of the public comment period on April 6, 2026, were considered, and are listed, but may not have specific responses in this document in accordance with 25 Pa. Code §127.427. A list of commenters are shown at the end of this document.

On April 2, 2026, the Department received comments from the company via email.

Comments from MarkWest Liberty Midstream & Resources, L.L.C.:

COMMENT 1: MarkWest requested more specificity in source names for Sources 101, 103, and 702. MarkWest also noted that “the Amine Unit (202) is a process unit and not a source. The sources within the amine unit are captured under fugitives, the CO₂ compressor, and the stabilization heater. Including the Amine Unit as a source may result in confusion during compliance inspections and annual AES reporting.”

RESPONSE 1: The Department will update the source names with more specificity as requested for Sources 101, 103, and 702.

Source 202, the Amine Unit, will remain as a source in the operating permit and will include the following source-specific requirements:

- The amine unit shall be routed to a closed vent system at all times except during periods when the CO₂ compressor is down, not to exceed 100 hours on a 12-month rolling basis.
- The permittee shall maintain records of the number of hours when the CO₂ compressor is down on a 12-month rolling basis.
- The permittee shall maintain records of amine usage on a 12-month rolling basis.
- The permittee shall maintain records of the amine circulation rate on a monthly basis.

In addition, the above recordkeeping requirements have been added to the facility-wide recordkeeping requirements in Section C, Condition #015. When the CO₂ compressor is not operational, the amine unit has an emission rate of 0.17 lbs VOC/hr, equating to 0.0085 TPY increase in facility-wide VOC potential-to-emit from 40.88 TPY to 40.89 TPY VOC.

COMMENT 2: MarkWest noted that the stack for Source 703, Measurement Devices, incorrectly lists the number of measurement devices on site.

RESPONSE 2: The stack for this source, Z703, listed eight (8) measurement devices on site. In reality, there are twenty-nine (29) measurement devices at this facility. The naming convention of the stack has been updated to match Source 703, listed as “Measurement Devices” and “Measurement Devices Fugitives”, respectively. The potential-to-emit for all measurement devices combined is 1.033 TPY VOC, 0.018 TPY total HAP, and 93 TPY CO_{2e}.

COMMENT 3: MarkWest commented that “the review memo lists 40.88 TPY VOC and the application calculations result in 40.891 TPY VOC. The VOC and CO_{2e} limits under Condition #007 include typographical errors.”

RESPONSE 3: The limitations in the proposed operating permit are correct. Although those limitations do not match the potential-to-emit listed in the application, the limitations in the proposed operating permit match those established under plan approval PA-63-01011. Those limitations from plan approval PA-63-01011 were listed under Section C of that plan approval and therefore apply facility-wide. Hence, those same limitations were incorporated into the draft operating permit. However, any facility-wide emission limitations established under plan approval PA-63-01011B may supersede such emission limitations established under PA-63-01011 or this state-only operating permit. Consequently, the requested changes to those limitations will not be made.

COMMENT 4: MarkWest commented, “Condition #009(b) requires a letter 120 calendar days prior to commencing a stack test referencing the approved protocol, and (c) requires another notification 15 days prior to commencing a stack test. These requirements appear duplicative. What is the basis for this change?”

RESPONSE 4: The 120-day and the 15-day timeframe represent two different notifications. The 120-day submittal requires that a pre-test protocol be submitted to the Department’s Division of Source Testing at least 120 days prior to anticipated performance testing. This timeframe allows for evaluation and approval of the protocol by the Department prior to conducting a performance (stack) test. Additional testing expenditures and possible compliance issues may occur if testing is conducted outside of an approved protocol. A new protocol submittal is not required if one has previously been approved by the Department, provided that the stack testing company, methodologies, testing equipment, and air contamination sources being tested do not change. Any new air contamination sources or modifications to existing sources or changes in stack testing companies or methodologies would require a new protocol submittal to the Division of Source Testing within 120 days prior to an anticipated testing date.

The minimum 15-day notification is a notification to the Regional Office for the anticipated date of testing so that an inspector or other Department representative may be present to observe stack testing if the Department, in its discretion, chooses to observe. This notification is described in Section 2.1.1 of the Department’s Division of Source Testing manual.

The protocol submittal and notification to the Regional Office timelines will remain unchanged.

COMMENT 5: 1.) The permit references requirements to conduct performance testing within 180 days of re-authorization. Some existing source testing schedules do not fall within 180 days of the project permit issuance date. Can the Department confirm that maintaining the current source testing schedules, based on the previous plan approval issuances, is acceptable? For example, Source 37 was tested on March 20, 2026 and therefore, following the 3-year timeline, would not require testing again in 2026.

2.) The OOOOb NHV requirements are currently being reconsidered and are expected to be finalized in the coming weeks, and a second OOOOb reconsideration is expected by the end of 2026. Rather than including the OOOOb language directly in the permit, MarkWest requests that the permit reference the NSPS OOOOb sections to avoid confusion between versions of the rule and eliminate the need for permit modifications as the regulatory language changes.

RESPONSE 5: Regarding testing schedules, Sources 031, 033, 034, and 036 are required to undergo performance testing (stack testing) *or* periodic monitoring (portable analyzer) within 180 days of authorization or reauthorization of this state-only operating permit that mirror the prior applicable requirements of Section L(1)(b)(iii) from the 2018 version of the GP-5.

For Source 037, the same requirements from plan approval PA-63-01011 have been carried over into this state-only operating permit. This source is not required to be tested within 180 days of issuance of this state-only operating permit. Rather, the three-year testing cycle will continue to apply. This source was tested on March 20, 2026, and therefore testing of this source will not be required until on or prior to March 20, 2029. In addition, the Department corrected an error in the permit map of the proposed operating permit to include the control device C037 for this heater.

Regarding 40 CFR Part 60 Subpart OOOOb requirements, according to a prepublication of a proposed revision to OOOOb made available by EPA on April 4, 2026, finalized in the Federal Register on April 9, 2026, and effective on June 8, 2026, the EPA published *Reconsideration of Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review*. In the summary on page 1 of this document, EPA writes, “Specifically, this action finalizes discrete technical changes to two aspects of the rules. First, this action finalizes discrete technical changes to the temporary flaring provisions for associated gas in certain situations. Second, this action finalizes discrete technical changes to the vent gas net heating value (NHV) continuous monitoring requirements and alternative performance test (sampling demonstration) option for flares and enclosed combustion device(s) (ECD).”^{1,2} Broadly speaking, in this revision, EPA is increasing the time allowable for temporary flaring operations from 24 hours to 72 hours; in addition, owners and operators do not need to perform net heating value (NHV) sampling from flares or enclosed combustion devices (ECD), except where inert gases or other miscellaneous scenarios are present.³

In the April 9, 2026 Final Rule’s *Summary of Final Amendments to NSPS OOOOb and EG OOOOc* section, it notes that in the March 2024 Final Rule, for each flare and ECD used to control gases, “the owner or operator must conduct continuous monitoring using a calorimeter, gas chromatograph (GC), or mass spectrometer (MS) in order to determine the NHV of the vent stream.” The summary continues:

As an alternative to continuous monitoring of NHV, the March 2024 Final Rule allows the owner or operator to conduct a performance test to demonstrate the NHV of the vent stream that consistently exceeds the applicable NHV operating limit in one of two ways: continuous sampling for 14 consecutive days plus ongoing (three samples every five years), or manual sampling (twice daily for 14 consecutive days) plus ongoing (three samples every five years) sampling. Owners or operators also have the option to use an alternative test method that demonstrates continuous compliance with the combustion efficiency limit.

EPA describes that exemptions from monitoring for gas streams with a high NHV content will be expanded except in cases where inert gases are added that decrease the NHV of the inlet stream to the flare and will require continuous monitoring or alternative performance testing (sample demonstration) as described in Subparts OOOOb and OOOOc. Inert gases are not added to the inlet gas stream to the flare at Harmon Creek, and therefore, the reduction in monitoring requirements from the March 2024 Final Rule is acceptable and would demonstrate compliance with 40 CFR Part 60 Subpart OOOOb as of the April 9, 2026, Final Rule.

¹ Document number EPA-HQ-OAR-2024-0358; FRL-12031-02-OAR at https://www.epa.gov/system/files/documents/2026-04/san-12031_final-rule_nsps-eg-ooooberecon1_preamble.pdf. Per this document, EPA notes that this link is expected to expire once the rule is finalized, but changes under this document number can be tracked in the Federal Register at <https://www.regulations.gov> in Docket No. EPA-HQ-OAR-2024-0358. As of April 9, 2026, the final rule appears at <https://www.federalregister.gov/documents/2026/04/09/2026-06808/reconsideration-of-standards-of-performance-for-new-reconstructed-and-modified-sources-and-emissions> under the same document number listed above, under 91 FR 18056.

² See also the accompanying fact sheet at https://www.epa.gov/system/files/documents/2026-04/oil-and-gas-reconsideration-1_fact-sheet_0.pdf.

³ Footnote 38 on page 31 of this document notes that the March 2024 Final Rule uses NHV monitoring to indicate if a control device is meeting its required destruction efficiency, whereby a “[net heating value] below the prescribed applicable minimum NHV value can be an indicator of reduced control device performance and efficiency at less than an acceptable level.”

Based on these changes in the final rulemaking, anticipated additional changes to this Subpart later this year, as well as matching Subpart OOOOb being incorporated by reference in plan approval PA-63-01011B, the Department finds it acceptable to incorporate 40 CFR Part 60 Subpart OOOOb requirements by reference in this instance as requested. MarkWest is and will be required to meet any and all applicable requirements of 40 CFR Part 60 Subpart OOOOb at the time of issuance of an operating permit, including any subsequent revisions to that Subpart. The Department may reconsider speciating requirements of this subpart in future permitting actions.

Comments from the Public:

COMMENT 6: Please hold a public hearing at the Burgettstown High School for the MarkWest Harmon Creek processing plant permit 63-01011 before you issue it. This plant cannot seem to keep their flare from blowing black smoke on us, so the public would appreciate hearing the Department's justification for why it thinks MarkWest should receive an approval for 63-01011 State Only Operating Permit.

RESPONSE 6: This permitting action consolidates existing permitting requirements from the GP-5 and plan approval PA-63-01011 into one state-only operating permit and does not authorize any new equipment or air contamination sources at the facility. Because this review is consolidating existing permitting requirements, the Department has determined in its discretion to not hold a public hearing in accordance with 25 Pa. Code §127.428 and is not required to utilize the enhanced public participation guidelines of the Environmental Justice Policy since this permitting action is not considered a *trigger permit* per the policy. Review of the application has indicated that MarkWest is capable of meeting its regulatory obligations. The Department is currently investigating complaints received regarding the flare and has the option to take enforcement action if any violations are documented. See also the Response to Comment 8 below.

COMMENT 7: MarkWest's Harmon Creek Processing Plant has ongoing, visible emissions from the plant's flare especially from November 2025 through March 2026. I made complaints to PADEP over the past several months using the public complaint form to no avail. I also emailed you [*Facilities Permitting Chief Tom Joseph*] as well as Mark Gorog about such events. I asked for a public hearing hoping to discuss this but was denied one, even in our Environmental Justice Area. The plant continues with its episodic events dumping pollution into the air we breathe in violation of MarkWest's air permit.

MarkWest is operating and self-reporting to the PA DEP while they have opacity problems that the community sees, breathes and complains about. We residents are forced to bear the burden as well as bare the burden of all this air pollution. Please do not give MarkWest a permit to continue or to expand their facility until these events cease and better monitoring of the plant's heater, flare and fugitives is achieved.

RESPONSE 7: The Department takes all environmental complaints seriously and is currently investigating complaints received regarding the flare and has the option to take enforcement action if any violations are documented. The proposed operating permit reflects the regulations that MarkWest is required to meet regarding monitoring, reporting, and recordkeeping requirements for the air contamination sources on site. See also the Response to Comments 6 and 8.

COMMENT 8: The Department received 149 comments with the following or similar concerns:

I am writing in opposition to the State-Only Air Quality Operating Permit for MarkWest Liberty Midstream & Resources, LLC. Harmon Creek Natural Gas Processing Plant. If approved, it would authorize operation of air contamination sources and cleaning devices associated with its expansion projects. MarkWest Energy is a repeat offender of violations that put the health of many in Western Pennsylvania [sic]. Last month alone, environmental groups alerted residents that MarkWest

released over 1.2 million gallons of drilling fluid since October 2025 during its pipeline construction activities. Neither MarkWest nor the PA DEP informed residents that their drinking water/private wells may be contaminated. To date, it is unclear whether the PA DEP has held MarkWest accountable. MarkWest Harmon Creek Natural Gas Processing Plant transports natural gas liquids via pipeline to other repeat offenders across Southeast, Pa. to make plastics, fuel and other petrochemical products. Despite mounting violations and accidents endangering workers and fenceline communities, MarkWest has been given a slap on the wrist (at most). They should be made to answer for and pay for their violations and not enabled. Please reject this permit, and put the health of people and the planet over corporate profit.

RESPONSE 8: This permitting action consolidates existing permitting requirements from the currently authorized general permit 5 (GP-5) and plan approval PA-63-01011 into one state-only operating permit and does not authorize any new air contamination sources or an expansion of the facility. Review of the application has indicated that MarkWest is capable of meeting its regulatory obligations. The Department is currently investigating complaints received regarding the flare and has the option to take enforcement action if any violations are documented. See also the Response to Comments 6 and 7 above.

While we understand and take seriously public concerns about environmental protection and community health, the Department's role in this permitting action is limited to evaluating whether the air contamination sources and associated air cleaning devices comply with applicable State and Federal air quality regulations. Permit decisions are based on technical, legal, and regulatory criteria—not on generalized concerns about a company's broader operations or unrelated incidents to the permitting action under review. Allegations regarding drilling fluid releases, pipeline construction activities, or potential impacts to drinking water fall under separate regulatory programs, and those programs have been apprised of these concerns.

With respect to compliance history, the Department does consider an applicant's record; however, past violations do not automatically preclude operating permit approval if the applicant demonstrates that the equipment meets all applicable emission limitations, monitoring requirements, and control standards. The purpose of this operating permit is to ensure enforceable limitations and oversight—not to "enable" violations. The compliance history at this facility is described in the associated review memorandum with this permitting action.

If violations have occurred, the Department has established processes for investigation and enforcement, including penalties where warranted. Assertions that the Department has failed to act should be directed through the appropriate complaint, enforcement, or legal channels, where they can be further evaluated based on any available evidence.

Most recently, on April 21, 2026, the Department sent a notice of violation (NOV) for operating Source 037 without proper use of its flue gas recirculation (FGR) control device, violating both PA-63-01011, Section B, Condition #004 and 25 Pa. Code §127.12(a)(10). In addition, a new, redesigned burner was installed and operated in this source without authorization by the Department on November 20, 2025, which constituted a violation of 25 Pa. Code §127.11. Any potential additional enforcement action is currently pending at the time of writing.

COMMENT 9: The Department received 220 comments with the following or similar concerns:

Please perform mass-based volatile organic compound (VOC) air monitoring at MarkWest Liberty Midstream & Resources, LLC's Harmon Creek Natural Gas Processing Plant. The Pennsylvania Department of Environmental Protection's (DEP) proposed operating permit for this facility does not include adequate monitoring requirements to ensure this facility's VOC emissions are below the

major-source threshold of 50 tons per year (TPY). The facility's current expansion, not included in the current permitting process, increases the likelihood that the facility's true VOC emissions will be above 50 TPY.

DEP's assumed 97% reduction in fugitive VOC emissions because of required optical gas imaging (OGI) inspections should be verified with mass-based air monitoring and supported by fenceline monitoring, which was required by DEP and the U.S. Environmental Protection Agency (EPA) at this facility from 2018 to 2020. Permanent, automated OGI cameras are widely available and would provide a more accurate account of VOC emissions at this facility, which is located in a state-designated Environmental Justice (EJ) area and within 1.5 miles of Burgettstown High School and Elementary School. It's also concerning that DEP did not inspect this facility in 2025, given its location in a census tract in the 98.8th percentile for pollution burden, according to DEP's PennEnviroScreen. DEP should consistently update its "community information" webpage for this facility with recent reports of leak inspections and attempted repairs so residents can be aware of potential local pollution issues.

DEP should require regular VOC testing of the facility's flare when it is known to be receiving gas from the many, diverse pollution sources that route emissions to the facility's air-assisted open flare. Given DEP's assumptions that 100% of routed emissions are captured by the flare and that this flare destroys 98% of VOC emissions, these assumptions must be consistently validated by emissions tests of the flare's VOC pollution.

I'm also concerned that neither MarkWest's permit application nor DEP's review memo included a record of blowdowns and emergency shutdowns (ESD) at this facility. Because this facility's estimated VOC pollution is close to the major source threshold, VOC emissions from blowdowns and ESDs could potentially result in the facility releasing over 50 TPY of VOC pollution. DEP's review memo for this permit application states that "Emissions from blowdowns and ESDs are included in the potential emission estimates from the flare" but DEP admits in its review memo that it cannot guarantee that emissions from ESDs are routed to the facility's flare.

Impacted residents deserve a public meeting where MarkWest will describe the facility's recent record of blowdowns and ESDs, and whether emissions from ESDs were routed to the facility's flare. MarkWest and DEP should additionally provide public records of the facility's required leak inspections.

RESPONSE 9: Regarding the request for mass-based VOC air monitoring and the adequacy of existing monitoring requirements, emission limitations in the operating permit are set below the major source levels (50 TPY) in Section C, Condition #007 of the proposed operating permit, and the facility must regularly demonstrate compliance with these limits. The operating permit includes practically enforceable requirements to ensure actual emissions remain below major source thresholds, and compliance must be demonstrated through established regulatory mechanisms, which include, but are not limited to, emission limitations, tracking fuel usage, heat inputs, periodic testing, manufacturer's specifications, monitoring of fugitive emission components through a leak detection and repair (LDAR) program in conformance with State and Federal regulations, recordkeeping and reporting requirements, and others.

Regarding the facility expansion, the current permitting action applies only to the sources and emissions evaluated in the application. This action is limited in scope to consolidating existing permitting requirements from the GP-5 and PA-63-01011. Plan approval PA-63-01011B, authorized in May 2025, was excluded from this review because construction of the new equipment is not complete at this time. PA-63-01001B will be incorporated into this state-only operating permit using existing permitting pathways after

compliance with the plan approval has been demonstrated. The requirements of both this state-only operating permit and PA-63-01011B concurrently apply to this facility. If any additional future expansions were proposed, it would be subject to a separate regulatory review and permitting requirements, including evaluation of potential emissions increases and applicability of major source thresholds.

Regarding the reduction in fugitive VOC emissions and the request for fenceline monitoring, optical gas imaging (OGI) is a widely accepted and federally recognized method for detecting fugitive emissions, and daily AVO inspections, and quarterly (all types except pumps) or monthly (pumps) LDAR inspections using OGI along with either annual (compressors), semi-annual (connectors and flanges), quarterly (pressure relief and valves), or monthly (pump components) monitoring using Method 21 (pump components) is required depending on the component type. Component type frequency monitoring is summarized as follows, and updates to these monitoring frequencies are also described in the response to Comment 12 below:

- Minimum inspection frequency for all air contamination sources is monthly AVO inspections.
- Daily AVO inspections on all component types.
- Weekly AVO inspections on pump components.
- Compressor component types: quarterly LDAR using OGI and annual Method 21;
- Pressure relief and valve component types: quarterly LDAR using Method 21;
- Pump component types: monthly LDAR using Method 21; and
- Connector and flange component types: quarterly LDAR using OGI and semi-annual LDAR using Method 21.

Current regulations require periodic OGI inspections, which are an accepted method of compliance. Continuous or automated OGI systems are not widely established monitoring requirements. The 97% control efficiency was applied to valves and pressure relief valves in gas vapor or light liquid service. Connectors in gas vapor or light liquid service used a 75% reduction. No reductions were granted for any component type in heavy liquid service. Those reductions are based on the Texas Commission on Environmental Quality (TCEQ) 28VHP program, with reductions found in APDG 6422v2. This program includes construction and quarterly monitoring requirements, as well as repair timelines if any leak is detected. MarkWest has been verified to be meeting the requirements of the 28VHP program.

Regarding environmental justice (EJ) concerns and proximity to schools, the Department recognizes the facility's location within an EJ area and considers EJ impacts consistent with established policy and permitting requirements. The permitting process ensures that emissions remain within limits designed to protect public health, including sensitive populations.

Regarding the inspection frequency, inspection frequency is resource dependent. However, the Department strives to establish annual contact with each facility in the Region and regardless inspections are performed at a greater frequency than required by EPA and Department policy. Since January 1, 2023, the Department has conducted eleven (11) complaint investigations at this facility.

Regarding the community information webpage, the Department maintains publicly accessible records and will continue to provide information in accordance with existing policies and available resources. Records of facility inspections and compliance activities are publicly available through established channels.

Regarding the request for regular VOC testing of the flare and the capture and destruction efficiency of the flare, the permit relies on established engineering assumptions and regulatory guidance regarding flare performance (e.g., capture and destruction efficiencies). The flare manufacturer, John Zink, has designed the plant flare to achieve a minimum 98% destruction efficiency of hydrocarbons under the specific process

conditions at Harmon Creek. The gas entering the plant has a low moisture content which helps to maintain a high flame temperature to achieve the designed destruction efficiency. To ensure that the flare is operated as designed, the pilot light is equipped with auto-reignition and monitored from the control room, the flow to the flare from both the sweep gas and from the process is metered, and the blower is variable speed to adjust with the metered gas flow to ensure sufficient oxygen for combustion and to maintain the net heating value of the gas (Btu/scf) in accordance with the requirements of 40 CFR §60.18 and 40 CFR Part 60 Subpart OOOOb. Combustion emissions from the flare were calculated by the applicant based upon emission factors from AP-42 Section 13.5 for Industrial Flares, which are an accepted calculation methodology. Performance (stack) testing of an open flare is generally not technically feasible; compliance is demonstrated through monitoring, recordkeeping, and operational requirements, and the proposed operating permit includes applicable regulatory requirements.

Regarding blowdowns and emergency shutdowns (ESDs), actual emissions from blowdowns and emergency shutdown events must be reported as a malfunction, include required reporting information, and must be included in facility-wide annual emission statement reports. Potential emissions for a limited number of ESD events are incorporated into potential emissions estimates on a conservative basis. Potential emissions were calculated based on the number of estimated blowdown events per year, expected duration, volume of gas routed to the flare, and the weight percentage of VOCs, HAPs, methane, and CO₂ in the inlet gas stream to the flare from a representative sample. After discussion with the company on April 30, 2026, it was clarified that all ESD events are routed to the plant flare. Blowdowns are routed to the flare when feasible depending on whether or not the piece of equipment being isolated is normally routed to the flare or vents to the atmosphere. Facility-wide potential emissions of VOCs are estimated to be 40.88 TPY, and potential emissions from all venting/blowdown activities at this facility were estimated to be the following:

- 2.13 TPY VOC;
- 0.04 TPY HAP;
- 6.84 TPY methane; and
- 0.02 TPY CO₂.

The operating permit ensures that actual emissions remain within enforceable limits. All emissions related to unplanned ESDs, should any occur, are required to be reported both as a malfunction and in annual AES emission inventory reports. Additionally, all malfunctions are evaluated for potential enforcement action.

Regarding the request for a public meeting and records of blowdown and ESD events, the Department reviews this information but is not required to be included in a review memorandum. However, over the past five calendar years (2021 – 2025), MarkWest reported the following number of ESD events to the Department:

- Four (4) in 2021;
- Three (3) in 2022;
- One (1) in 2023;
- Zero (0) in 2024; and
- One (1) in 2025.

Actual emissions from such events were included in AES emission inventory reports, which is publicly available data. If any facility were to emit above major source thresholds contrary to permitted limitations, enforcement action would be taken. Included in the review memorandum, for reference, actual emissions of VOCs reported from this facility were the following:

- 3.57 TPY in 2020;
- 5.10 TPY in 2021;
- 10.10 in 2022;
- 12.57 in 2023;
- 17.52 in 2024; and
- 12.45 in 2025 (*the 2025 AES report pending approval by the Department*).

The Department provides opportunities for public participation consistent with regulatory requirements, including comment periods. Because this review is consolidating existing permitting requirements, the Department has determined in its discretion to not hold a public hearing in accordance with 25 Pa. Code §127.428 and is not required to utilize the enhanced public participation guidelines of the Environmental Justice Policy since this permitting action is not considered a trigger permit per the policy. Records related to inspections, compliance, and facility operations are publicly available.

COMMENT 10: Commenters write, “DEP Should Deny This Permit Due to Ongoing Opaque Flaring at this Facility.” Commenters cite circumstances in which the Department may deny an operating permit in accordance with 25 Pa. Code §127.422(1) and that “DEP must be satisfied that the source ‘will not cause air pollution’ in accordance with 25 Pa. Code §127.402(c). Commenters reference Appendix A of their comments which list “observed black smoke and visible emissions [events] from the flare that have been captured by cameras or reported to DEP”. Commenters write that MarkWest has not self-reported any of these incidents, has not taken action to address the root cause of visible emissions, and that MarkWest has demonstrated that they are “likely to cause air pollution or to violate the act, the Clean Air Act or the regulations thereunder applicable to the source” at Harmon Creek. Commenters write that this “noncompliance” merits denial of the operating permit.

RESPONSE 10: The Department is aware of and is evaluating allegations of visible emissions at the facility. The Department conducts compliance and enforcement activities in accordance with applicable regulatory requirements, including established observational methods and evidentiary standards.

With respect to opacity and visible emissions, compliance determinations must be based on observations conducted in accordance with approved reference methods, such as EPA Method 9, which require a certified human observer and adherence to specific procedures such as the distance to a source, the angle of the sun, the position of the sun, among other variables. Imagery obtained from publicly available cameras may not be able to serve as the sole basis for a regulatory determination of noncompliance. Additionally, camera imagery may not accurately represent opacity due to limitations in resolution, lighting, and lens characteristics.

Notwithstanding the above, the Department may consider such materials, along with citizen complaints and other information, as part of a broader evaluation to determine whether further investigation is warranted. Where appropriate, the Department will conduct inspections and take enforcement action consistent with the Pennsylvania Air Pollution Control Act, applicable federal requirements, and the Pennsylvania Code.

The existence of alleged or ongoing investigations does not, in itself, establish that the source is unable to comply with applicable requirements or that the criteria for permit denial under 25 Pa. Code §127.402 or §127.422 have been met. The Department’s permitting decisions are based on a comprehensive review of the application, applicable regulatory requirements, and the source’s ability to operate in compliance with those requirements.

The Department encourages the public to report suspected air quality incidents through its established complaint channels, which assist in identifying potential compliance issues and prioritizing inspection resources.

As referenced by commenters, 25 Pa. Code §127.422 lists five (5) criteria in which the Department will deny an operating permit:

The Department will deny or refuse to revise or renew an operating permit to a source to which one or more of the following applies:

(1) The Department has determined it is likely to cause air pollution or to violate the act, the Clean Air Act or the regulations thereunder applicable to the source.

(2) In the design of the source, provision is not made for adequate verification of compliance, including source testing or alternative means to verify compliance.

(3) The EPA has notified the Department in writing that the permit is not in compliance with the requirements of the Clean Air Act or the regulations thereunder.

(4) The applicant has constructed, installed, modified or operated an air contamination source or installed air pollution control equipment or devices on the source contrary to the plans and specifications approved by the Department.

(5) The applicant or a related party has a violation or lack of intention or ability to comply that is listed on the compliance docket.

Per each of these criteria under 25 Pa. Code §127.422:

(1) The Department is currently investigating reported incidents of visible emissions. If the Department determines that violations have occurred, enforcement action may be taken. A record of or lack of violations at a facility, whether historical or ongoing, does not inherently preclude issuance of an operating permit if the applicant demonstrates that the equipment meets all applicable emission limitations, monitoring requirements, and control standards. MarkWest has demonstrated that this facility is capable of meeting its regulatory obligations.

(2) The facility is designed and operated in such a way that the permit can be crafted to include practically enforceable requirements. The proposed operating permit includes requirements from applicable Federal subparts, the Department's current version of the GP-5, plan approval PA-63-01011, and terms and conditions the Department deems necessary to assure the proper operation of the source under 25 Pa. Code §127.441, which include emission limitations, periodic testing, monitoring, reporting, and recordkeeping requirements.

(3) The EPA has not notified the Department in writing that the permit is not in compliance with the requirements of the Clean Air Act or the regulations thereunder.

(4) The applicant has not constructed, installed, modified or operated an air contamination source or installed air pollution control equipment or devices on the source contrary to the plans and specifications approved by the Department. The facility was constructed and operated in accordance with the requirements of the Department's GP-5, GP-1, and subsequent general permit and plan approval authorizations.

(5) There is no pending violation on the compliance docket of the Environmental Hearing Board (EHB).

Based on the five (5) criteria in 25 Pa. Code §127.422, none of the above are met and compel the denial of the operating permit.

COMMENT 11: The emission limits in the draft SOOP are insufficient and incomplete. Commenters assert that the draft operating permit fails to incorporate permit limitations established under plan approval PA-63-01011B. Commenters also assert that “DEP’s Draft SOOP fails to include emissions limitations for pollutants of concern that MarkWest admitted to releasing in its SOOP Application in high quantities.”

Commenters assert that the 14.0 TPY VOC limitation for the plant-wide flare is incorrect, should reflect the emission limitation established under plan approval PA-63-01011B, and is higher than the potential-to-emit of that air cleaning device as described in the associated review memorandum.

Commenters assert that “DEP erroneously omitted emissions limitations for both PM and SO₂ as required by 25 Pa. Code §123.11 and §123.22, respectively, from the De-Ethanizer Regen Heater, Source 035, and the Cryo Plant 2 Regen Heater, Source 037.”

RESPONSE 11: The review memorandum repeatedly stressed that plan approval PA-63-01011B was excluded from this review since construction activities are ongoing at this time. The requirements of plan approval PA-63-01011B will be incorporated into the operating permit through the appropriate permitting mechanisms at the appropriate time. The requirements of plan approval PA-63-01011B apply concurrently with those in this state-only operating permit.

Once construction activities finish, temporary operation via plan approval extensions may be granted. After such a time, the Department must verify that MarkWest is meeting all of the requirements of plan approval PA-63-01011B, and if MarkWest has demonstrated compliance with the plan approval, an administrative amendment application will be applied for and reviewed by the Department to incorporate the plan approval into the operating permit. In any case, MarkWest must meet the requirements of both the state-only operating permit and plan approval PA-63-01011B until such a time when the plan approval is incorporated into the operating permit through the appropriate permitting process. In the case of any conflicting requirements, the most stringent requirement applies.

A plan approval or operating permit is not required to establish numerical emission limitations for every source or every pollutant emitted by a source. A plan approval, operating permit, general permit, or other Department authorization serves to reflect applicable and practically enforceable regulatory requirements at a facility. The proposed operating permit reflects the emission limitations applicable to this facility under the GP-5 and plan approval PA-63-01011. This includes facility-wide emission limitations established under PA-63-01011, source-specific emission limitations for Source 037, and source-specific emission limitations for sources authorized under a GP-5, and mirrors current regulatory requirements.

Regarding discussion of the flare VOC emission limitation, a 14.0 TPY VOC limitation was established under plan approval PA-63-01011. As such, since that plan approval represents the current authorization for this facility, that limitation applies. It is slightly higher than the state-only operating permit review memorandum’s potential-to-emit of 13.34 TPY VOC; however, the applicable emission limitation is 14.0 tons as was established when plan approval PA-63-01011 was authorized.⁴ Any emission limitations established under plan approval PA-63-01011B will be incorporated into the state-only operating permit through appropriate permitting pathways, which may include a lower limitation based on a vapor recovery unit for sources covered under that plan approval.

⁴ This limitation applies to the air contamination sources and air cleaning devices authorized under the Harmon Creek I and II projects. It does not encompass those sources authorized under plan approval PA-63-01011B. Any emission limitations established under plan approval PA-63-01011B would apply after construction activities are completed and compliance with the terms and conditions of that plan approval have been demonstrated to the satisfaction of the Department.

Similarly, commenters argue that the state-only operating permit did not accurately include counts of fugitive emission components under Source 701 since it does not include components associated with any new air contamination sources and air cleaning devices authorized under plan approval PA-63-01011B. The review memorandum noted that incorporating plan approval PA-63-01011B was outside the scope of this review, as this review was limited in scope to the plan approval PA-63-01011 and the currently authorized general permit, which covers the Harmon Creek I and II projects. The requirements of plan approval PA-63-01011B will be incorporated into the operating permit through the appropriate permitting process.

Regarding adding 25 Pa. Code §123.11 and §123.22 as source-specific requirements for Sources 035 and 037, the Department agrees that these are applicable requirements and have been added as source-specific requirements in the operating permit.

COMMENT 12: Commenters assert that the draft state-only operating permit fails to include clear monitoring, testing, recordkeeping, and reporting requirements that are necessary to assure compliance with emissions limits and air pollution laws.

Commenters assert that the draft state-only operating permit lacks adequate monitoring, testing, recordkeeping, or reporting requirements to verify compliance with the operating permit and that the permit lacks appropriate monitoring, recordkeeping, and reporting of emissions.

Commenters assert that the monitoring, testing, recordkeeping, and reporting requirements for the heaters source group are insufficient (Sources 031, 033, 034, and 036) since the draft operating permit includes CO, NO_x, SO₂, and PM emission limitations for the Heaters source group but only includes periodic monitoring requirements for CO and NO_x. Commenters assert that the Department must add monitoring requirements for SO₂ and PM to ensure compliance with the emission limitations. Commenters request the use of Continuous Emissions Monitoring Systems (“CEMS”) should be required for all pollutants subject to mass or volume-based limits and specifically for the heaters.

Commenters also discuss additional monitoring requirements should be imposed on the plant flare, including the use of a video surveillance camera.

Commenters also assert that semi-annual monitoring of fugitive emissions components must require Method 21 and request that additional monitoring of fugitive emission components be imposed.

Lastly, commenters seek clarification on the meaning of “low-e” valves and packing.

RESPONSE 12: Commenters claim that the draft operating permit lacks appropriate monitoring, reporting, recordkeeping, and testing requirements, specifically related to the Heaters Source Group in Section E of the operating permit. Commenters note there are emission limitations for CO, NO_x, SO₂, and PM for the heaters, and that periodic monitoring is only required for NO_x and CO and request additional monitoring for SO_x and PM to ensure practical enforceability.

The current operating permit mirrors requirements that are applicable to combustion units in the Department’s GP-5 and GP-1 that were applicable at the time of authorization of those air contamination sources. These requirements include periodic monitoring of NO_x and CO as well as tune ups within 180 days of authorization and on a recurring five-year basis, which help ensure adequate combustion of the fuel and proper operation of the source(s). 40 CFR §60.42c is applicable to this source group and specifically exempts affected sources from needing to meet the SO₂ standards of that subpart based on fuel supplier certifications. Compliance with the particulate matter emission limitation of 0.4 lbs PM/MMBtu heat input from 25 Pa. Code §123.11 can be demonstrated using manufacturer’s specifications or by using

commercially available natural gas as fuel. Therefore, compliance with those limitations can be demonstrated without the specific need for periodic monitoring of those pollutants.

Commenters also requested that the three-year periodic monitoring frequency of the combustion unit authorized under PA-63-01011A, Source 037, should match those of the other combustion units on site (Sources 031, 33, 34, and 36), which are on a five-year periodic monitoring schedule. The periodic monitoring frequency established for each combustion unit is based on applicable best available technology (BAT) requirements that were in effect at the time of authorization of the source and reflect the applicable requirements in the Department's GP-5 and plan approval PA-63-01011. MarkWest may elect to conduct periodic monitoring at a different frequency or one in which the schedule for all heaters aligns, provided that they meet the minimum five-year or three-year cycle for each respective air contamination source.

Commenters note that Source 035 "does not include any monitoring, testing, or recordkeeping requirements for the De-Ethanizer Regen Heater" and nor does it "include any work practice requirements such as tune-ups and inspections to assure that the heater is operated and maintained according to manufacturer specifications or good engineering practices, requiring only that the source be fired exclusively on natural gas."

Source 035 is not required to undergo additional monitoring, testing, recordkeeping, or tune up inspections. Since this combustion unit is rated at less than 10.0 MMBtu/hr (at 6.60 MMBtu/hr), the only applicable requirement from the GP-5 is for the unit to be fired exclusively on natural gas per the 2018 GP-5, Section L(1)(a). MarkWest must also maintain records of fuel consumption and track records of actual emissions on a 12-month rolling basis, as is the case with all air contamination sources at the facility.

Commenters also describe that there is no initial testing requirement for the combustion unit designated as Source 037. This is because initial testing occurred under plan approval PA-63-01011 and has continued to meet its three-year periodic monitoring testing requirement, the most recent of which was conducted on March 20, 2026.

Commenters also request that a continuous emissions monitoring system (CEMS) be installed for all combustion units (i.e. heaters) at this facility. Products of combustion from natural gas-fired or similar composition fuel for combustion units are well understood, and the Department has determined that CEMS are not appropriate for combustion units at this time and that other monitoring, reporting, work practice standards, recordkeeping requirements, and fuel limitations (if appropriate) are sufficient to ensure proper operation of the source. The Southwest Regional Office is not aware of any instances of a CEMS unit being installed on a combustion unit rated at less than 50.0 MMBtu/hr. The proposed operating permit reflects BAT requirements established under the Department's GP-5, GP-1, and plan approval PA-63-01011 for the combustion units authorized to operate at this facility.

Commenters write that "the monitoring and reporting requirements for the plant flare are insufficient to verify compliance and should be revised to require monitoring at least every two hours and a video camera directed at the flare tip."

Monitoring on a two-hour basis and the use of a video camera directed at the flare tip is not required by regulation, however, it is an *option* to demonstrate compliance allowable under applicable regulations at this facility. As noted, the Department is currently investigating any potential issues and complaints of visible emissions from the plant flare. The flare is required to meet 40 CFR §60.18. Under that Federal requirement, compliance with §60.18 is met by meeting the requirements of any other applicable Federal subpart to that source. In this instance, that would be the requirements of 40 CFR Part 60 Subpart OOOOb. 40 CFR Part 60 Subpart OOOOb requires *either* (1.) daily audio, visual, and olfactory (AVO) inspections in

accordance with 40 CFR §60.5397b and XXX, and monthly EPA Method 22 monitoring per 40 CFR §60.5412b(a)(3)(vii) or (2.) the use of a video surveillance camera per 40 CFR §60.5417b(h) of Subpart OOOOb.

Additional monitoring requirements, such as demonstrating a consistent minimum net heating value, monitoring the inlet gas composition stream, and tracking the volumetric flow rate to the flare help ensure proper operation of the source. MarkWest is also required to maintain records of maintenance, throughput, and actual emissions from the flare.

However, although this condition is anticipated to be incorporated into the operating permit at a later date, upon additional consideration, the Department will add the same requirement under plan approval PA-63-01011B, Source C601, Condition #004 to the operating permit, which states the following:

The owner or operator shall conduct visible emissions observations using either the methods in paragraph (1) of this section or, alternatively, the methods in paragraph (2) of this section. The owner or operator must record and report any instances where visible emissions are observed for more than 5 minutes during any 2 consecutive hours as specified in §60.18(c)(1).

(1) At least once per day for each day a process is routed to the flare, conduct visible emissions observations using an observation period of 5 minutes using Method 22 at 40 CFR part 60, appendix A-7. If at any time the owner or operator sees visible emissions while a process is routed to the flare, even if the minimum required daily visible emission monitoring has already been performed, the owner or operator shall immediately begin an observation period of 5 minutes using Method 22 at 40 CFR part 60, appendix A-7. If visible emissions are observed for more than one continuous minute during any 5-minute observation period, the observation period using Method 22 at 40 CFR part 60, appendix A-7 must be extended to 2 hours or until 5-minutes of visible emissions are observed. Daily 5-minute Method 22 observations are not required to be conducted for days the flare does not receive any volumetric flow from any process.

(2) Use a video surveillance camera to continuously record (at least one frame every 15 seconds with time and date stamps) images of the flare flame and a reasonable distance above the flare flame at an angle suitable for visual emissions observations. The owner or operator must provide real-time video surveillance camera output to the control room or other continuously manned location where the camera images may be viewed at any time.⁵

The proposed operating permit sent out during the public comment period required daily AVO inspections and monthly Method 22 observations that originated from plan approval PA-63-01011 and were more stringent than otherwise applicable monitoring requirements at the time. The proposed operating permit also included alternative monitoring provisions (such as the use of a video surveillance camera) for determining visible emissions from the flare in accordance with 40 CFR §60.5417b(h) of Subpart OOOOb. This frequency will be updated to the language shown above, to continue daily AVO monitoring and at a minimum, daily Method 22 observations for a minimum of five minutes, unless visible emissions are observed that prompt additional readings.

Commenters also assert that the Department must require Method 21 for semi-annual inspections as well as additional monitoring of fugitive emissions components, and requests that the enhanced LDAR monitoring in plan approval PA-63-01011B should match what is required in this state-only operating permit.

⁵ The last part of this condition in plan approval PA-63-01011B that states that, "The owner or operator must record and report any instances where visible emissions are observed for more than 5 minutes during any 2 consecutive hours as specified in §60.18(c)(1)." This was already included as an applicable requirement to the flare in the proposed operating permit and therefore does not need to be duplicated.

Fugitive emission monitoring requirements in the draft operating permit originated from a number of overlapping regulatory requirements, including the GP-5, 25 Pa. Code §129.127, plan approval PA-63-01011, and 40 CFR Part 60 Subpart OOOOb, depending on when any given piece of equipment or source was constructed.

Of note, plan approval PA-63-01011 clarifies that daily AVO inspections of all component types are required, and that weekly AVO inspections on pump components would be conducted by MarkWest's LDAR team.

Commenters note that plan approval PA-63-01011B required enhanced monitoring of fugitive emission components, which included semi-annual monitoring of all *connectors and flanges* using Method 21 instead of annually as required in PA-63-01011. Commenters note that the review memorandum for plan approval PA-63-01011B specifically states that this semi-annual monitoring supersedes that which was imposed under PA-63-01011. The Department agrees that this monitoring frequency should be updated to semi-annually, in alignment with plan approval PA-63-01011B, as this type of monitoring would apply to the entire facility, regardless of when any air contamination source was authorized. The annual Method 21 requirement for *compressor component* types from plan approval PA-63-01011A will remain, as plan approval PA-63-01011B does not specify a monitoring frequency for compressor component types, though it should be noted that quarterly LDAR using OGI is also required for compressor component types.

Source-specific requirements in Section D, Condition #002 for Source 702, Fugitive Emission Components, in the proposed operating permit has been updated as follows:

For each fugitive emissions component constructed and authorized to operate at this facility, the following applies:

(a) No later than thirty (30) days after an emission source commences operation, and at least monthly thereafter, the owner or operator of a facility shall conduct an AVO inspection.

(i) The owner/operator shall conduct daily AVO inspections on all component types.

(ii) Additionally, the owner/operator shall conduct weekly AVO inspections on pump components.

(b) For compressor component types, no later than sixty (60) days after initial startup, and at least quarterly thereafter, the owner or operator shall conduct an LDAR program using an (optical gas imaging) OGI camera. Additionally, a gas leak detector that meets the requirements of 40 CFR Part 60, Appendix A-7, Method 21, shall be conducted at least annually.

(c) For pressure relief and valve components types, no later than sixty (60) days after initial startup, and at least quarterly thereafter, the owner or operator shall conduct an LDAR program using a gas leak detector that meets the requirements of 40 CFR Part 60, Appendix A-7, Method 21.

(d) For pump component types, no later than 60 days after initial startup, and at least monthly thereafter, the owner or operator shall conduct an LDAR program using a gas leak detector that meets the requirements of 40 CFR Part 60, Appendix A-7, Method 21.

(e) For connector and flange component types, no later than sixty (60) days after initial startup, and at least semi-annually thereafter, the owner or operator shall conduct an LDAR program using Method 21.

This change removes “connectors” from “compressor and connector component types” originally in (b) above, and adds (e) to include flanges and connectors to a semi-annual Method 21 LDAR monitoring program. In the case of any conflicting LDAR monitoring requirements, the most stringent requirement applies.

Lastly, commenters seek clarification on the meaning of “low-e” valves and packing. The meaning of “low-e” valves, packing, and similar terminology are defined terms under 40 CFR §60.5430b of OOOOb (“*What definitions apply to this subpart?*”) which is cited in Section E, Condition #018 of the Source Group *SUBPART OOOOB REQUIREMENTS* in the proposed operating permit. In relevant part, a *low-e valve* is defined as one in which the “manufacturer has issued a written warranty or performance guarantee that it will not emit fugitives at greater than 100 ppm in the first five years”.

COMMENT 13: Commenters write, “Plant 3 is nearly constructed, and DEP cannot ignore emissions changes for Plants 1 and 2 that were made in PA-01-01011B, and DEP must immediately amend this SOOP to include Plant 3 upon being operational.”

RESPONSE 13: As described in the review memorandum and in other responses to comments, after construction activities are completed *and* MarkWest can demonstrate compliance with all terms and conditions in plan approval PA-63-01011B, the state-only operating permit will be amended to incorporate the applicable requirements of plan approval PA-63-01011B. Both authorizations will concurrently apply to the facility. The state-only operating permit will cover operations for the Harmon Creek I and II projects, while plan approval PA-63-01011B encompasses those air contamination sources and air cleaning devices authorized under that plan approval. Emission discrepancies from the review of PA-63-01011B are based on the installation of a new air cleaning device, a vapor recovery unit, as well as changes to fugitive emission component counts, pigging frequencies, and others as a result of the project authorized in May 2025.

Conclusion:

I recommend the issuance of an initial natural minor state-only operating permit for this facility with the changes described in this document. The operating permit will have an effective date of two weeks after the official date of issuance so that the permittee has time to acclimate to any changes from the previously authorized GP-5 and plan approval PA-63-01011 to the terms and conditions of this state-only operating permit. The operating permit will be effective for a five-year term from the official date of issuance.

List of Commenters:

Commenter No.	Date	Name	Affiliation	Response No.
1	3/27/2026	John Schaefer		8
2	3/27/2026	Bob Moyer		8
3	3/27/2026	Karen Montgomery		8
4	3/27/2026	Ieva Levkus		8
5	3/27/2026	Edwin Torres		8
6	3/27/2026	Frederick Shamlian		8
7	3/27/2026	Laura Chinofsky		8
8	3/27/2026	Polly Lupean		8
9	3/27/2026	Linda Bescrypt		8
10	3/27/2026	Toni Garner Brown		8
11	3/27/2026	Kathie Boyer		8
12	3/27/2026	Linda Hays		8
13	3/27/2026	Isabelle Sneeringer		8
14	3/27/2026	Debra Metzger		8
15	3/27/2026	Reuben Wade		8
16	3/27/2026	Brian Murray		8
17	3/27/2026	Eric Pash		8
18	3/27/2026	Charles B. Clarke		8
19	3/27/2026	Kathleen Kellett		8
20	3/27/2026	Mary Ellen Sychtyz		8
21	3/27/2026	Chris King		8
22	3/27/2026	Dorothy Li Calzi		8
23	3/27/2026	Paige Shearer		8
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25	3/27/2026	Jim Eby		8
26	3/27/2026	Bonnie Stoeckl		8
27	3/27/2026	Gary Williams		8
28	3/27/2026	Al Roesch		8
29	3/27/2026	Bonnie Winter		8
30	3/27/2026	Janis Kinslow		8
31	3/27/2026	Joseph Kenosky		8
32	3/27/2026	Robert Dannaker		8
33	3/27/2026	Fred Hixson		8
34	3/27/2026	James R. Swenson		8
35	3/27/2026	Jason Ramel		8
36	3/27/2026	Edward Drinkwater		8
37	3/27/2026	Nick Maddaloni		8
38	3/27/2026	Sheila Erlbaum		8
39	3/27/2026	Christina M. Ferrell		8

40	3/27/2026	Anne I. Davenport		8
41	3/27/2026	Michele Sciortino		8
42	3/27/2026	Carol Bowers		8
43	3/27/2026	Sean Visda-Hart		8
44	3/27/2026	John Palmee		8
45	3/27/2026	Maria Nallin		8
46	3/27/2026	Amy Merritt		8
47	3/27/2026	Robert Clark		8
48	3/27/2026	Dorothea Leicher		8
49	3/27/2026	Susanne Groenendaal		8
50	3/27/2026	Tom Gruver		8
51	3/27/2026	Scott Parker		8
52	3/27/2026	Laura Fake		8
53	3/27/2026	Mark White		8
54	3/27/2026	Maureen Schulze		8
55	3/27/2026	Jean Wiant		8
56	3/27/2026	Aggie Perilli		8
57	3/27/2026	Tammy Murphy		8
58	3/27/2026	Graeme Thomson		8
59	3/27/2026	Jere Walkow		8
60	3/27/2026	Terry Moore		8
61	3/27/2026	Shari Johnson		8
62	3/27/2026	Jane Zendarski		8
63	3/27/2026	Julie Kaye		8
64	3/27/2026	Audrey Garrett		8
65	3/27/2026	Kaylene Schultz		8
66	3/27/2026	Mary Jean Sharp		8
67	3/27/2026	Barbara Recker		8
68	3/27/2026	Laura Neiman		8
69	3/27/2026	Kenneth Griffith Jr		8
70	3/27/2026	Herode Beauvais		8
71	3/27/2026	Charles Brill		8
72	3/27/2026	David Zabriskie		8
73	3/27/2026	Ruth Fogarty		8
74	3/27/2026	Greta Rossi		8
75	3/27/2026	William Haegele		8
76	3/27/2026	Monica Harbison		8
77	3/27/2026	Melvin Armolt		8
78	3/27/2026	Stacey Bostaph		8
79	3/27/2026	Laurie Prince		8
80	3/27/2026	Frank Belcastro		8
81	3/27/2026	Carole Ackelson		8

82	3/27/2026	Robert Weiner		8
83	3/28/2026	Spencer Koelle		8
84	3/28/2026	Susan Babbitt		8
85	3/28/2026	Allison Ector		8
86	3/28/2026	Elena Villeco		8
87	3/28/2026	Ernest Johnson		8
88	3/28/2026	Douglas Kinney		8
89	3/28/2026	Mary Ann Smale		8
90	3/28/2026	Pamela Nolan		8
91	3/28/2026	Jeffrey Slott		8
92	3/28/2026	Linda Myers		8
93	3/28/2026	M.S.		8
94	3/28/2026	D. Burn		8
95	3/28/2026	William Hayes		8
96	3/28/2026	John Bush		8
97	3/28/2026	Cindy Adams		8
98	3/28/2026	Lisa Steckhouse		8
99	3/28/2026	Kevon Frey		8
100	3/28/2026	Chris Stanton		8
101	3/28/2026	John Stofko		8
102	3/28/2026	Francesca Tomaino		8
103	3/28/2026	Michael McGoff		8
104	3/28/2026	Gary Coller		8
105	3/28/2026	Haven Kortz		8
106	3/28/2026	Laurel Person Mecca		8
107	3/28/2026	Lauren Steffy		8
108	3/28/2026	Rita Pesini		8
109	3/28/2026	Char Esser		8
110	3/28/2026	Richard Tregidgo		8
111	3/28/2026	Brian Tercha		8
112	3/28/2026	Elizabeth Demro		8
113	3/28/2026	Eileen Miller		8
114	3/28/2026	Sarah Effrig		8
115	3/28/2026	Susan Haley		8
116	3/28/2026	Susannah Beckett		8
117	3/28/2026	Robert Schmalz		8
118	3/28/2026	Clare Fey		8
119	3/28/2026	Mary Lynn Toth		8
120	3/28/2026	Linda Groves		8
121	3/28/2026	Eric Wheeler		8
122	3/28/2026	I. O'Hare		8
123	3/28/2026	Alan Lowry		8

124	3/28/2026	Jean Billings		8
125	3/28/2026	Jamie Burks		8
126	3/28/2026	Patricia Harlow		8
127	3/28/2026	Timothy Shelley		8
128	3/28/2026	Suzanne Lamborn		8
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131	3/28/2026	Ann Callahan		8
132	3/29/2026	Alex Kondrich III		8
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134	3/29/2026	Pamela Wallace		8
135	3/29/2026	Sharon Craven		8
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137	3/29/2026	Kathleen Miller		8
138	3/29/2026	Michelle Hudson		8
139	3/30/2026	Carol Gallimore		8
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163	4/2/2026	Nancy McCullough		9
164	4/2/2026	Kathryn Westman		9
165	4/2/2026	Susan Porter		9

166	4/2/2026	Robin Mcfall		9
167	4/2/2026	Carl Rider		9
168	4/2/2026	Greta Rossi		9
169	4/2/2026	Regina Stephano		9
170	4/2/2026	MaryAnn Linehan		9
171	4/2/2026	Taylor Lamborn		9
172	4/2/2026	Joan Kolessar		9
173	4/2/2026	Bonnie McGill		9
174	4/2/2026	Cori Bishop		9
175	4/2/2026	John Stofko		9
176	4/2/2026	Warren Hodgkiss		9
177	4/2/2026	Jeff Harvey		9
178	4/2/2026	Robert Smith		9
179	4/2/2026	Richard Tregidgo		9
180	4/2/2026	Nancy Bergey		9
181	4/2/2026	Donna Theis		9
182	4/2/2026	David Kleist		9
183	4/2/2026	Amy Merritt		9
184	4/2/2026	Donald Milliman		9
185	4/2/2026	Wendy Davis		9
186	4/2/2026	Kevin McCluskey		9
187	4/2/2026	Brad Rea		9
188	4/2/2026	Donna Smith		9
189	4/2/2026	Barbara Reitmeyer		9
190	4/2/2026	Michael Tar		9
191	4/2/2026	Marcia Godich		9
192	4/2/2026	Sheryl Kreps		9
193	4/2/2026	Nancy Ortiz		9
194	4/2/2026	Carol Book		9
195	4/2/2026	Darcie Prestis		9
196	4/2/2026	Dennis Carlson		9
197	4/2/2026	Robert Clark		9
198	4/2/2026	Sandra Goodwin		9
199	4/2/2026	Twila Garletts		9
200	4/2/2026	Van Knox		9
201	4/2/2026	Jay Smith		9
202	4/2/2026	Mike Peale		9
203	4/2/2026	Kevin Oldham		9
204	4/2/2026	William Murphy		9
205	4/2/2026	B. Fink		9
206	4/2/2026	Sharon Weiss		9
207	4/2/2026	Benita Campbell		9

208	4/2/2026	David Zabriskie		9
209	4/2/2026	Linda Hays		9
210	4/2/2026	Mark Nordyke		9
211	4/2/2026	Kathryn DiGiorgio		9
212	4/2/2026	Karen Hollowell		9
213	4/2/2026	Maureen Schulze		9
214	4/2/2026	Diane Selvaggio		9
215	4/2/2026	Linda Wood		9
216	4/2/2026	Tom Wardell		9
217	4/2/2026	Michael Balsai		9
218	4/2/2026	Lois Ann Griffiths		9
219	4/2/2026	Susie Folks		9
220	4/2/2026	Pat Northeimer		9
221	4/2/2026	Robert Rhodes		9
222	4/2/2026	Linda Granato		9
223	4/2/2026	Christina Criss		9
224	4/2/2026	Carrie Swank		9
225	4/2/2026	Lois Thompson		9
226	4/2/2026	Saundra Petrella		9
227	4/2/2026	Mary Centola		9
228	4/2/2026	Stacey Bradley		9
229	4/2/2026	Dorothea Leicher		9
230	4/2/2026	D. Burn		9
231	4/2/2026	Laura Chinofsky		9
232	4/2/2026	Bob Moyer		9
233	4/2/2026	Jeff Reiferson		9
234	4/2/2026	Bryan McAnally		9
235	4/2/2026	Tom Gauntt		9
236	4/2/2026	Susan Verbalis		9
237	4/2/2026	Judith Bohler		9
238	4/2/2026	Susan Shopland		9
239	4/2/2026	Lisa Steckhouse		9
240	4/2/2026	Daniel Brown		9
241	4/2/2026	George Erceg		9
242	4/2/2026	Erik Ammon		9
243	4/2/2026	Gail Neustadt		9
244	4/2/2026	Mandy Tshibangu		9
245	4/2/2026	Dustin Kordish		9
246	4/2/2026	Thomas Baer		9
247	4/2/2026	Kathleen Garvey		9
248	4/2/2026	Judith Bennis		9
249	4/2/2026	Nancy Cohen		9

250	4/2/2026	Dorothy Holtzman		9
251	4/2/2026	Michaela Kelly		9
252	4/2/2026	Alan Peterson		9
253	4/2/2026	Jim Richards		9
254	4/2/2026	As Reier		9
255	4/2/2026	Frank Bartell		9
256	4/2/2026	Ann-Marie Christopher		9
257	4/2/2026	Rich Matusz		9
258	4/2/2026	Frank Schaller		9
259	4/2/2026	Teresa Salamone		9
260	4/2/2026	Wayne Kessler		9
261	4/2/2026	Dennis Schaef		9
262	4/2/2026	April LaBuda		9
263	4/2/2026	Nicholas Diamond		9
264	4/2/2026	Helene Rosen		9
265	4/2/2026	R. Dannaker		9
266	4/2/2026	Herode Beauvais		9
267	4/2/2026	Beth Barnhill		9
268	4/2/2026	Cassidy Boulan		9
269	4/2/2026	Kenneth Griffith		9
270	4/2/2026	John Belch		9
271	4/2/2026	Frank Sabatini		9
272	4/2/2026	James McBride		9
273	4/2/2026	MaryCatherine Lowery		9
274	4/2/2026	K. Danowski		9
275	4/2/2026	James Keenan		9
276	4/2/2026	Debra Metzger		9
277	4/2/2026	Harry Hochheiser		9
278	4/2/2026	Susan Babbitt		9
279	4/2/2026	Daniel Cush Sr		9
280	4/2/2026	Chris Sanders		9
281	4/2/2026	Caroline Cotugno		9
282	4/2/2026	Liana Lang		9
283	4/2/2026	Linda Frye		9
284	4/2/2026	Diane Eagan		9
285	4/2/2026	James DiMunno		9
286	4/2/2026	Jean Kammer		9
287	4/2/2026	Christine Derr		9
288	4/2/2026	Christine Lutz-Walturz		9
289	4/2/2026	Leann Turley		9
290	4/2/2026	Lynn D. Glielmi		9
291	4/2/2026	Julia White		9

292	4/2/2026	Joanna Hollis		9
293	4/2/2026	Adelaide Steely		9
294	4/3/2026	Meg Richter		8
295	4/3/2026	Sari Steuber		9
296	4/3/2026	Karen Paris		9
297	4/3/2026	Richard Van Aken		9
298	4/3/2026	Douglas Kinney		9
299	4/3/2026	David Nichols		9
300	4/3/2026	Linda Myers		9
301	4/3/2026	Michael McGoff		9
302	4/3/2026	David Zanardelli		9
303	4/3/2026	Polly Riddle		9
304	4/3/2026	Tamara Reese		9
305	4/3/2026	John Bush		9
306	4/3/2026	Ron Richter		9
307	4/3/2026	Thea Sikora		9
308	4/3/2026	Gemma Legel		9
309	4/3/2026	Cossette Si		9
310	4/3/2026	Jane Randall		9
311	4/3/2026	John Nickey		9
312	4/3/2026	Richard Nelson		9
313	4/3/2026	Kathryn Morrow		9
314	4/3/2026	Jill Turco		9
315	4/3/2026	Mary Lynn Toth		9
316	4/3/2026	Manon Roberge		9
317	4/3/2026	Donald Fatzinger		9
318	4/3/2026	Kathleen Miller		9
319	4/3/2026	Pamela Hess		9
320	4/3/2026	Tara Hoffman		9
321	4/3/2026	Donna Oliver		9
322	4/3/2026	Joseph Gammaitoni		9
323	4/3/2026	Anna Tangi		9
324	4/3/2026	Gary Williams		9
325	4/3/2026	James Burt		9
326	4/3/2026	James Stoner		9
327	4/3/2026	Peter Tafuri		9
328	4/3/2026	Ralph Becker		9
329	4/3/2026	Suzanne Lamborn		9
330	4/3/2026	Catherine Burke		9
331	4/3/2026	Ted Alex		9
332	4/3/2026	Don Hawkins		9
333	4/3/2026	Sterling Schrauger		9

334	4/3/2026	Shannon Elliott		9
335	4/3/2026	R.S.		9
336	4/3/2026	K Nich		9
337	4/3/2026	Perry Kendall		9
338	4/3/2026	Timothy Shelley		9
339	4/3/2026	Charlene Rush		9
340	4/3/2026	Thomas Nelson		9
341	4/3/2026	Stan Kumiega		9
342	4/3/2026	Allison Ector		9
343	4/3/2026	Laurie Strine		9
344	4/4/2026	Kevin Long		8
345	4/4/2026	D. Bergen		8
346	4/4/2026	Joe Mack		9
347	4/4/2026	Simetra Sanctuary		9
348	4/4/2026	Quarry Sanctuary		9
349	4/4/2026	Alice Ginder		9
350	4/4/2026	Anne W.		9
351	4/4/2026	Gale Reid		9
352	4/4/2026	Michael Burger		9
353	4/4/2026	Judith McGovern		9
354	4/5/2026	Valeri Fornagiel		9
355	4/5/2026	Shirley J.		9
356	4/6/2026	Desiree Rammon		9
357	4/6/2026	Maryjane Allen		9
358	4/6/2026	Allison Alberts		9
359	4/6/2026	Danielle Lion		9
360	4/6/2026	Cyd Musni		9
361	4/6/2026	Lisa Hallowell	Environmental Integrity Project (EIP)	10-13
362	4/6/2026	Lawrence Hafetz	EIP on behalf of Clean Air Council	10-13
363	4/6/2026	Cathy Lodge	EIP/Resident	6-7, 10-13
364	4/6/2026	Chris Lodge	EIP/Resident	7, 10-13
365	4/6/2026	Elissa Weimer	EIP	10-13
366	4/6/2026	Mike Tokarski	EIP	10-13
367	4/6/2026	Trina Tokarski	EIP	10-13
368	4/6/2026	Eva Stetar	EIP	10-13
369	4/6/2026	Matt Stetar	EIP	10-13
370	4/6/2026	Katie Jones	EIP on behalf of FracTracker Alliance	10-13
371	4/6/2026	Rachel Meyer	EIP on behalf of Moms Clean Air Force Pennsylvania Chapter	10-13
372	4/6/2026	Angela M. Kilbert	EIP on behalf of PennFuture	10-13

373	4/6/2026	Ana Hoffman	EIP on behalf of Carnegie Mellon University, CREATE Lab	10-13
374	4/6/2026	Cheryl Johncox	EIP on behalf of People Over Petro Coalition	10-13
375	4/6/2026	Ned Ketyer	EIP on behalf of Physicians for Social Responsibility	10-13
376	4/6/2026	Anaïs Peterson	EIP on behalf of Earthworks	10-13
377	4/6/2026	Seth Sherman	EIP on behalf of Center for Coalfield Justice (CCJ)	10-13
378	4/6/2026	Heather Hulton VanTassel	EIP on behalf of Three Rivers Waterkeeper	10-13
379	4/6/2026	Jasmine Gil	EIP on behalf of Hip Hop Caucus	10-13
380	4/6/2026	Matt Mehalik	EIP on behalf of The Breathe Project	10-13
381	4/6/2026	Michelle Naccarati-Chapkis	EIP on behalf of Women for a Healthy Environment	10-13
382	4/6/2026	Ashley Funk	EIP on behalf of Mountain Watershed Association	10-13
383	4/7/2026	<i>Diane Hoover</i>		9
384	4/7/2026	<i>Douglas Powless</i>		9
385	4/9/2026	<i>Lauren Rabb</i>		8
386	4/9/2026	<i>Neil Straub</i>		9
387	4/9/2026	<i>Barbara Heil</i>		9
388	4/12/2026	<i>Seth Sherman</i>	<i>Center for Coalfield Justice</i>	
389	4/14/2026	<i>Mary Ann Leitch</i>		9
390	4/15/2026	<i>Harry Baker</i>		9
391	4/15/2026	<i>Andrew Puglionesi</i>		9
392	4/22/2026	<i>Mary Slegel</i>		9
393	4/23/2026	<i>Garret Wassermann</i>		9