



May 25, 2021

Alexandra Juarez, G&P Engineer I
MarkWest Liberty Midstream and Resources, L.L.C.
4600 J Barry Court, Suite 500
Canonsburg, PA 15317

Re: Administrative Incompleteness Determination
Application No. PA-63-00936I
MarkWest Liberty Midstream and Resources, L.L.C.
Chartiers Township, Washington County

Dear Ms. Juarez:

On April 27, 2021, the Department of Environmental Protection (Department) received the above referenced application for a new Plan Approval for the Houston Gas Plant located in Chartiers 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:

- Provide a detailed PSD applicability analysis that includes a comparison to the significant increase thresholds. Please ensure that the emissions increase from the proposed project are included. Please note that the analysis should include CO, NO_x, SO_x, VOC, Lead (if this facility emits lead), PM₁₀, and PM_{2.5}. [25 Pa. Code §127.12(a)(2)]
- Provide a detailed NA-NSR applicability analysis that includes a comparison to the significant increase thresholds. Please ensure that the emissions increase from the proposed project are included. [25 Pa. Code §127.12(a)(2)]
- Provide Chartiers Township and Washington County with revised notices which indicate that the application is for a major facility plan approval. Please submit the revised letters and proof of notice to the Department. [25 Pa. Code §127.12(a)(2) and 25 Pa. Code §127.12(a)(8)]
- Because the facility will be reviewed as a major facility, please submit the necessary Addendum A attachments. [25 Pa. Code §127.12(a)(2)]
- Please provide an aerial view of the facility showing the property outline. [25 Pa. Code §127.12(a)(2)]

- Please provide the stack height for each stack. [25 Pa. Code §127.12(a)(2)]
- Please provide the weight percent for each of the components indicated in the gas analysis. [25 Pa. Code §127.12(a)(2)]
- The application did not include a Best Available Technology (BAT) analysis. Please provide a BAT analysis for any new sources, sources that weren't previously accounted for, and sources that will be modified. Please also list which sources MarkWest believes should not be required to undergo BAT analysis with reasoning as to why it should not be required (i.e. grandfathered source, no modification, etc.). See 25 Pa. Code §127.12(a)(5) and Section D of the plan approval application for BAT information. Please see the definition, below, for a new source per 25 Pa. Code §121.1. [25 Pa. Code §127.12(a)(5)]

“New source—A stationary air contamination source which:

(i) Was constructed and commenced operation on or after July 1, 1972.

(ii) Was modified, irrespective of a change in the amount or kind of air contaminants emitted, so that the fixed capital cost of new components exceeds 50% of the fixed capital cost that would be required to construct a comparable entirely new source; fixed capital costs means the capital needed to provide the depreciable components.”

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-63-00936I. 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: 63-936

Operations (Anna Fabrizi)

Harrisburg C.O. (Permits)