

Fact Sheet



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

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on March 15, 2022.

Permit Number: **R30-10300042-2022 MM01/MM02**
Application Received: **March 29, 2023 / May 23, 2023**
Plant Identification Number: **03-54-10300042**
Permittee: **MarkWest Liberty Midstream & Resources LLC**
Facility Name: **Mobley Gas Plant**
Mailing Address: **1515 Arapahoe Street, Tower 1, Suite 1600**
Denver, CO 80202-2137

Permit Action Number: *MM01 / MM02* Revised: *January 16, 2024*

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

Facility Description

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

the gas stream. At this point the gas is saleable and is compressed prior to leaving the facility via pipeline. The natural gas liquids are transported offsite via pipeline.

The minor modification MM01 is based on the permit R13-2878I – revision of engines’ CM-1002 through CM-1006 emission factors to account for most recent performance test data, and an increase of the maximum volume to the facility flare (FL-991).

The minor modification MM02 is based on the permit R13-2878J – a correction of a typographical error in permit R13-2878I, incorporating an update to the plant flare (FL-991) throughput in Section 9.1.1 of the NSR permit (Title V permit condition 8.1.1).

Emissions Summary

This modification results in the following emission changes:

Pollutant	Increase in PTE, TPY
NOx	5.80
CO	9.97
VOC	4.36

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 126.18 tpy of CO, 132.94 tpy of NO_x and 100.2 TPY of VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, MarkWest Liberty Midstream & Resources LLC is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

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

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

Federal and State:	45CSR13 45CSR30	NSR Permits Operating permit requirements
State Only:	None	

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

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

Active Permits/Consent Orders

The active permits/consent orders affected by this modification are as follows:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2878J	May 24, 2023	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under

the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

The following changes were made to the permit during these modifications (MM01/MM02):

1. Section 4.0 (Compressor Engines requirements) – NO_x emission rates for internal combustion engines CM-1002, CM-1003, CM-1004, CM-1005, and CM-1006 were revised from 0.71 lb/hr to 0.89 lb/hr, and from 3.61 tpy to 4.38 tpy (condition 4.1.1.a.i).
2. Section 6.0 (Flare Requirements) - the maximum flow rate to the flare system (FL-991) was revised from 109.7 MMscf per year to 154.00 MMscf per year (condition 6.1.2.g), and total emission limits for NO_x, CO and VOC from the flare were increased (condition 6.1.2.h).
3. Section 8.0 (Blowdown Operations) – the maximum waste/purge gas flow rate for flare (FL-991) was revised from 109.7 MMscf per year to 154.0 MMscf per year (condition 8.1.1).
4. Revised Title V boilerplate conditions 2.1.3, 2.11.4, 2.17, 2.22.1, 3.5.3, 3.5.4, 3.5.7, 3.5.8.a.1, and 3.5.8.a.2.

Non-Applicability Determinations

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

None.

Request for Variances or Alternatives

None.

Insignificant Activities

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

Comment Period

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

Point of Contact

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

Natalya V. Chertkovsky-Veselova
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 41250
natalya.v.chertkovsky@wv.gov

Procedure for Requesting Public Hearing

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

Response to Comments (Statement of Basis)

Not applicable.