

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**
Application Received: **February 26, 2024 / May 29, 2024**
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: *MM03 / MM04* Revised: *November 13, 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 MM03 is based on the permit R13-2878K to replace three (3) natural gas engines (CM-1004, CM-1005, and CM-1006) with three (3) electric motors (M-1004, M-1005, and M-1006). The replacement of natural gas engines with electric motors results in an emission reduction.

The minor modification MM04 is based on the permit R13-2878L to replace two (2) natural gas-fired Waukesha P9390 engines (CM-1002 and CM-1003) with two (2) like-in-kind natural gas-fired Waukesha P9390 engines. The horsepower and emission rates for the engines will not change with the replacement.

Emissions Summary

Minor modification (MM04) results in no change in emission, but minor modification (MM03) results in the following emission changes:

Pollutant	PTE Change (tons/year)
Nitrogen Oxides	-13.55
Carbon Monoxide	-16.42
Volatile Organic Compounds	+3.88
Particulate Matter-10	-2.07
Sulfur Dioxide	-0.12
Total HAPs	-1.17

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 109.76 tpy of CO, 119.39 tpy of NO_x and 104.08 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	NSR Permits
	45CSR16	Standards of Performance for New Stationary Sources Pursuant to 40 CFR Part 60
	45CSR30	Operating permit requirements
	40 C.F.R. Part 60, Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.
	40 C.F.R. Part 60, Subpart OOOOb	Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification or Reconstruction Commenced After December 6, 2022
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>)
R13-2878K	April 8, 2024	
R13-2878L	July 8, 2024	

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

40 C.F.R. Part 60, Subpart OOOOb:

40 C.F.R. Part 60, Subpart OOOOb requirements for fugitive emissions components do not apply. Compressor stations can trigger fugitive emissions requirements under Subpart OOOOb by adding compressors that result in an increase in the total horsepower at the station. However, gas plants such as Mobley, trigger Subpart OOOOb for fugitive emissions components through modification or reconstruction that results in a capital expenditure. The costs associated with the changes at Mobley did not meet the definition of a capital expenditure.

❖ The following changes were made to the permit for the modification MM03:

- Compressors CM-1004, 1005 and 1006 were removed from Section 1.1.
- References to CM-1004, 1005 and 1006 were removed from Section 4.
- Electric Motor Driven Compressors M-1004, M-1005, and M-1006 were added to Section 1.1.
- Applicable requirements were added as conditions 4.1.6, 4.2.2, 4.2.3, 4.4.9, and 4.5.2 for new electric driven compressors (Emission point IDs: M-1004, M-1005, and M-1006) that will be subject to 40CFR60 Subpart OOOOb.

❖ The following changes were made to the permit for the modification MM04:

- Installation date was changed in Section 1.1 for CM-1002 and CM-1003 from 2012 to 2024.
- Permit condition to reference Subpart OOOOb instead of Subpart OOOO was changed in Section 4.1.1.e.
- Applicable requirements were added as conditions 4.1.6, 4.2.2, 4.2.3, 4.4.9, and 4.5.2 for compressor engines CM-1002 and CM-1003 that will be subject to 40CFR60 Subpart OOOOb.

- The reference to CM-1002 and CM-1003 in condition 4.4.3 and the reference to condition 4.1.1.e in condition 4.5.1 were removed because the compressors are now subject to 40CFR60 Subpart OOOOb and no longer subject to 40CFR60 Subpart OOOO.

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:

Beena Modi
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 41283
Beena.j.modi@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)

The following boilerplate changes have been made to the permit. These changes to the boilerplate became effective September 23, 2024.

- **Condition 3.1.6.** – Revised the citation to refer to the current version of the WV Code.
- **Condition 3.3.1.** – Revised the citation to refer to the current version of the WV Code.
- **Condition 3.3.1.b.** – Added “If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit shall be revised in accordance with 45CSR§30-6.4 or 45CSR§30-6.5 as applicable.”