

MEMO TO : File
Andeavor Field Services LLC (Andeavor)
Staley Compressor Station (Mountrail County, ND), Robinson Lake Gas Plant (Mountrail County, ND), and Belfield Gas Plant (Stark County, ND)

FROM : Eric Yablonski, EIT
Environmental Engineer, *Division of Air Quality*
North Dakota Department of Environmental Quality (Department)

RE : August 18, 2025, all applications received for Permits to Construct (PTCs)

DATE : March 9, 2026

Andeavor submitted PTC applications for Stanley Compressor Station (ACP-18308 v1.0), Robinson Lake Gas Plant (ACP-18309 v1.0), and Belfield Gas Plant (ACP-18310 v1.0) to the Department by August 18, 2025. The facilities currently operate under AOP-28511 v1.0, AOP-28404 v1.0, and AOP-27924 v3.1 respectively.

Pursuant of the Consent Decree (CD) DOJ No. 90-5-2-1-113742/2 ¶71a, MPLX L.P., which owns Andeavor Field Services LLC, is required to obtain federally enforceable non-Title V permits incorporating certain requirements to outlive the eventual termination of the CD. Once the PTCs are issued, the permit conditions will be incorporated into the Title V permits upon receipt of timely Title V permit applications (for Stanley Compressor Station and Robinson Lake Gas Plant, which are Title V major sources). Each facility will remain a minor (Belfield) or Title V source (Stanley & Robinson).

To facilitate EPA approval, exact CD language was included in the PTCs as advised by Andeavor. Modifications replaced “MPLX” to “the permittee,” removed all mention of “effective date” which was filed April of 2023, and removed *explicit references*; it was determined through correspondence with Andeavor that the requirements to be incorporated only include those explicitly referenced and sub-referenced in CD ¶71b. This means that any requirements beyond those explicitly stated in ¶71b will be omitted from the PTCs (i.e. ¶¶35-40, Sections IX-XI, and Appendix B). Relevant definitions for CD-defined terms were added (i.e. “Alarm,” “Covered Equipment,” and “Leak” in context of optical gas imaging [OGI]).

However, many requirements in CD ¶71b were identified as restatements of already applicable regulation. For clarity, a list of practical requirements was developed (see Section 1), the following pages step through the requirements of ¶71b paragraph by paragraph, providing Department interpretations (see Section 3), and Table 1 summarizes the applicability of each paragraph and requirement to each facility (see Section 2). This document demonstrates that the list of practical requirements summarized below comply with the CD requirements by identifying how each requirement from the CD is fulfilled, exempted under non-applicability, or omitted due to already applicable regulation; however, the list of practicable requirements will not be legally binding as the permit is, simply a guide to follow at the facility’s own risk.

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After a complete review of the proposed project indicating that the facility is expected to comply with applicable federal and state air pollution rules and regulations, the Department will make a recommendation on PTC issuance for the sources listed above following the completion of a thirty-day public comment period. The public comment period will run from March 12, 2026, through April 11, 2026.

Update Post-Comment Period:

[reserved]

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1. Practical Requirements Summary

A. Staley Compressor Station (ACP-18308 v1.0):

1) NSPS OOOOa

The facility shall comply with NSPS OOOOa as the means of compliance for all affected facilities subject to NSPS OOOO. It is no longer voluntarily elected but required.

2) OGI Protocol

The facility shall comply with the EPA-approved OGI Protocol approved on January 29, 2024 found in Appendix B unless a more recent EPA-approved revision exists.

3) Pilot-Operated (Pressure) Relief Valves (PORVs)

- a) The permittee shall install and operate Bottom Dome Vent Piping on existing PORVs that have a Pre-existing Tap and Isolation Valve which is subject to NSPS OOOOa, except for the PORV categories identified as:
 - 1] Atmospheric PORVs that are not otherwise required to be routed through a closed-vent system; or
 - 2] Snap-action PORVs.
- b) The permittee shall repair all leaks of PORVs detected using RM 21 within the time frames provided:
 - 1] By no later than 5 days after detecting a leak, the permittee shall perform a first attempt at repair of the PORV.
 - 2] By no later than 15 Days after detection, the permittee shall perform a final attempt at repair of the PORV or place it on the DOR list provided that the permittee has complied with all applicable regulations.
- c) For all PORVs placed on the DOR list, the permittee shall:
 - 1] Require sign-off from the relevant process unit supervisor or person of similar authority that the PORV is technically infeasible to repair without a Process Unit Shutdown; and
 - 2] Monthly monitor PORVs placed on the DOR using RM 21.
- d) The permittee shall maintain records for compliance with requirements 1.A.3)b) and 1.A.3)c).

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B. Robinson Lake Gas Plant (ACP-18309 v1.0):

1) Automatic Shutdown

- a) The permittee shall implement automatic shutdown capabilities for the dehydrators (DEHY-1, DEHY-2, & DEHY-3). If any dehydrators over pressurize, the CPMS (continuous parameter monitoring system) shall automatically shut down the over-pressurized dehydrators.
- b) If Flare-2 and Flare-3 are non-operational, as indicated by the CPMS, failure of the monitoring equipment, local control panel, or PLC, then the CPMS for Flare-2 and Flare-3 shall Alarm personnel, and the CPMS shall automatically shut down the affected dehydrators, as described in the Site-Specific Monitoring Plan (Appendix A).
 - 1] Alarm shall mean a sensor that instantaneously and remotely notifies the permittee of a variance in a monitored parameter.
 - 2] Affected dehydrators shall mean those dehydrators that supply effluent to the non-operational flares.
- c) If Flare-2 and Flare-3 are non-operational, as indicated by unlit pilot flames observed during an OVA inspection, the permittee shall immediately manually shut down all dehydrators, and initiate an Alarm.
- d) If any dehydrator fails to automatically shut down, the permittee shall conduct a Root Cause Analysis.
- e) The dehydrators must remain shut down until the permittee both performs corrective action(s) and confirms that Flare-2 and Flare-3 are operating as required by 40 CFR 63.771(d)(4)(i).
- f) The permittee shall conduct follow-up OVA inspections of Flare-2 and Flare-3 for no less than fifteen minutes while the dehydrators are operating to validate a successful restart and following completion of correction action(s).

2) NSPS OOOOa

The facility shall comply with NSPS OOOOa as the means of compliance for all affected facilities subject to NSPS OOOO and NSPS KKK. It is no longer voluntarily elected but required.

3) OGI Protocol

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The facility shall comply with the EPA-approved OGI Protocol approved on January 29, 2024 found in Appendix B unless a more recent EPA-approved revision exists.

- 4) Pilot-Operated (Pressure) Relief Valves (PORVs)
 - a) The permittee shall install and operate Bottom Dome Vent Piping on existing PORVs that have a Pre-existing Tap and Isolation Valve which is subject to NSPS OOOOa, except for the PORV categories identified as:
 - 1] Atmospheric PORVs that are not otherwise required to be routed through a closed-vent system; or
 - 2] Snap-action PORVs.
 - b) For all PORVs placed on the DOR list, the permittee shall:
 - 1] Require sign-off from the relevant process unit supervisor or person of similar authority that the PORV is technically infeasible to repair without a Process Unit Shutdown; and maintain records for compliance with this requirement.

5) NSPS NNN

While usually only applicable to SOCFI facilities, the distillation units pertaining to fractionation (deethanizers, depropanizers, debutanizers, and the plant flare FLARE-1 [FLARE-2 as emergency]) are subject to NSPS NNN because they produce propane and butane. They shall comply using the alternative means of compliance under 40 CFR 60.660 and comply with 40 CFR 65 Subparts A, D, and G. The permittee has identified each process stream as Group 1 and shall comply with these requirements.

C. Belfield Gas Plant (ACP-18308 v1.0):

1) NSPS OOOOa

The facility shall comply with NSPS OOOOa as the means of compliance for all affected facilities subject to NSPS OOOO and NSPS KKK. It is no longer voluntarily elected but required.

2) OGI Protocol

The facility shall comply with the EPA-approved OGI Protocol approved on January 29, 2024 found in Appendix B unless a more recent EPA-approved revision exists.

3) Pilot-Operated (Pressure) Relief Valves (PORVs)

- a) The permittee shall install and operate Bottom Dome Vent Piping on existing PORVs that have a Pre-existing Tap and Isolation Valve

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which is subject to NSPS OOOOa, except for the PORV categories identified as:

- 1] Atmospheric PORVs that are not otherwise required to be routed through a closed-vent system; or
 - 2] Snap-action PORVs.
- b) For all PORVs placed on the DOR list, the permittee shall:
- 1] Require sign-off from the relevant process unit supervisor or person of similar authority that the PORV is technically infeasible to repair without a Process Unit Shutdown; and maintain records for compliance with this requirement.
- 4) NSPS NNN

While usually only applicable to SOCFI facilities, the distillation units pertaining to fractionation (deethanizer, 2 depropanizers, 2 debutanizers, and the plant flare [FLR-1]) are subject to NSPS NNN. They shall comply using the alternative means of compliance under 40 CFR 60.660(d) and comply with 40 CFR 65 Subparts A, D, and G. The permittee has identified each process stream as Group 1 and shall comply with these requirements.

2. CD Applicability Summary

Table 1. CD Applicability Summary. X denotes applicability.

CD ¶ 71b Requirements Referenced Paragraphs or Regulations	i 27(c)(ii)	ii MACT HH	iii 30, NSPS OOOOa	iv 48	v					vi 55-56, NSPS Dc	vii 57-58, NSPS NNN, 40 CFR 60.660(d)
					50	51	52	53	54		
Stanley Compressor Station			Already elected	Comply with OGI-Protocol		¹ 40 CFR 60.5397a(g)	² X	X	⁴ X		
Robinson Lake Gas Plant	X	Already subject	Already elected	Comply with OGI-Protocol		¹ 40 CFR 60.5401a(b)(1)	³ X	X	⁴ X		X
Belfield Gas Plant			Already elected	Comply with OGI-Protocol		¹ 40 CFR 60.5401a(b)(1)	³ X	X	⁴ X		X

¹ Requirements are fully covered under the listed applicable regulation.

² Requirements are partially covered under 40 CFR 60.5397a(a & h).

³ Requirements are partially covered under 40 CFR 60.5401a(b)(2-3) and 60.482-7a and 9a.

⁴ Requirements are partially covered under 40 CFR 60.5420a.

3. Applicable Requirements Derivation from CD ¶71b

The list numbering below corresponds directly to CD ¶71b unless otherwise cited (i.e. below is from CD ¶71b(i)). Department interpretation is shown in bold.

- i. The automatic Shutdown requirements of Paragraph 27(c)(ii) at Robinson Lake Gas Plant
 - (CD ¶ 27(c)(ii)) *Shutdown of Dehydrator-1, -2, and -3 at Robinson Lake Gas Plant.* ~~At all times when Dehydrator 1, 2, and 3 are operating at Robinson Lake Gas Plant, MPLX must operate Flare 3 or Flare 2, as required by 40 C.F.R. § 63.771(d)(4)(i).~~ If Dehydrators-1, -2, or -3 over-pressurize, the CPMS must automatically Shutdown the over-pressurized Dehydrators at Robinson Lake. If Flare-2 and Flare-3 are non-operational, as indicated by unlit pilot flames observed during an OVA inspection, MPLX shall immediately manually Shutdown Dehydrators-1, -2, and -3, and initiate an Alarm. If Flare-2 and Flare-3 are non-operational, as indicated by the CPMS, failure of the monitoring equipment, local control panel, or PLC, then the CPMS for Flare-2 and Flare-3 must Alarm MPLX personnel, and the CPMS automatically Shutdown the affected Dehydrators at Robinson Lake, as described in the Site-Specific Monitoring Plan. Dehydrator-1, -2, and -3 must remain Shutdown until MPLX performs the following: (i) corrective action(s), and (ii) confirm that Flare-2 and Flare-3 are operating as required by 40 C.F.R. § 63.771(d)(4)(i). MPLX personnel shall conduct follow-up OVA inspections of Flare-2 and Flare-3 for no less than fifteen minutes while Dehydrator-1, -2, and -3 are operating to validate a successful restart and following completion of correction action(s). If Dehydrator-1, -2, or -3 fails to automatically Shutdown, MPLX shall conduct a Root Cause Analysis.

DEQ interpretation: The above selection is omitted because flares 2 and 3 are control devices for the TEG dehydrator (DEHY-3) covered under MACT HH in the current permit (AOP-28404 v1.0). This requirement is only applicable to Robinson Lake Gas Plant.

- ~~ii. MACT HH as it applies to all Dehydrators and Flares at Robinson Lake Gas Plant~~

DEQ interpretation: CD ¶71b(ii) is omitted because Robinson Lake Gas Plant is already subject to MACT HH in their current permit (AOP-28404 v1.0). Additionally, ACP-18215 v1.0 established federally enforceable operational limits on the glycol units to ensure the facility remains an area source of HAP. This requirement is only applicable to Robinson Lake Gas Plant.

- iii. Subpart OOOOa as it applies to Subject Gas Plants (CD ¶ 30)
 - (CD ¶ 30) Upon the Effective Date, MPLX shall accept applicability of and comply with 40 C.F.R. Part 60, Subpart OOOOa at all Affected Facilities at all of the Subject Gas Plants, except as set forth below:

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- a. ~~The requirements of this Paragraph shall not apply to the Red Wash/24B Gas Plant while it is non-operational (i.e., has suspended production and ceased daily operations). If the Red Wash/24B Gas Plant resumes operations prior to termination of the Consent Decree, MPLX must notify EPA and the Applicable State Co-Plaintiff in accordance with Section X (Notices) and comply with this Paragraph immediately.~~
- b. ~~The requirements of this Paragraph shall not apply to the Ironhorse Complex Gas Plant T-1 condensate atmospheric storage tank and T-2 slop oil atmospheric storage tank. MPLX shall comply with the conditions set forth in its Title V permit application at the Ironhorse Complex. Upon issuance of the Title V permit for the Ironhorse Complex, MPLX shall comply with its terms and conditions. MPLX shall comply with Paragraph 49 (Optical Gas Imaging Program) of this Consent Decree at the Ironhorse Complex Gas Plant T-1 condensate atmospheric storage tank and T-2 slop oil atmospheric storage tank. Within 90 Days of the Effective Date, MPLX shall also submit an engineering evaluation to the EPA which demonstrates that the vapor control system that manifolds the Ironhorse Complex Gas Plant T-1 condensate atmospheric storage tank and the T-2 slop oil atmospheric storage tank together is adequately designed to route all vapors to the control device.~~

DEQ interpretation: CD ¶¶ 30a-b are omitted since they do not apply to Stanley Compressor Station, Robinson Lake Gas Plant, or Belfield Gas Plant. All three facilities have elected to comply with NSPS OOOOa in their current operating permits (AOP-28511 v1.0, AOP-28404 v1.0, and AOP-27924 v3.1 respectively). “Accept applicability of” is interpreted to mean that the CD is mandating compliance with NSPS OOOOa as the alternative means of compliance with NSPS OOOO (and NSPS KKK where applicable) instead of voluntary election. Functionally, NSPS OOOO affected facilities are still required to follow the requirements of NSPS OOOOa.

- iv. OGI as it applies to the Subject Gas Plants (CD ¶ 48)
 - a. ~~OGI Protocol. MPLX shall develop a protocol for OGI monitoring of all Covered Equipment, and Fin Fan Unit plugs in light liquid and/or gas/vapor service (as defined in 40 C.F.R. § 60.481a), at Subject Facilities. The OGI Protocol shall ensure:~~
 - i. ~~Use of an optical gas imaging instrument (“OGI Instrument”) that complies with the requirements of 40 C.F.R. § 60.18(i)(1);~~
 - ii. ~~Consideration of parameters such as viewing distance, thermal background, wind speed, interferences (e.g., steam), and operator training, unless sufficiently addressed by the instrument manufacturer’s operating parameters. If MPLX is relying on~~

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- ~~manufacturer's operating parameters, those parameters must be included in the OGI Protocol;~~
- ~~iii. An instrument check that complies with the requirements of 40 C.F.R. § 60.18(i)(2) is performed on the OGI Instrument each day it is used to ensure that the OGI Instrument can effectively detect Leaks under the conditions outlined in Paragraph 48.a.(ii). above;~~
 - ~~iv. Maintenance of the OGI Instrument is performed in accordance with the manufacturer's recommendations;~~
 - ~~v. Operation of the OGI Instrument is performed in accordance with the manufacturer's operating parameters;~~
 - ~~vi. OGI Leaks are defined consistent with Paragraph 20.kk.; and~~
 - ~~vii. Performance of OGI monitoring by a technician certified to detect Leaks using OGI.~~
- ~~b. Submission and Approval of the OGI Protocol. No later than 60 Days after the Effective Date, MPLX shall submit the OGI Protocol to EPA and State Co-Plaintiffs for review and approval. EPA's review and approval of the OGI Protocol, in consultation with the States, shall follow the procedures set forth in Section XI (Approval of Deliverables).~~
- ~~c. Semi-Annual OGI Monitoring Program.~~
- ~~i. Starting no later than 30 Days after EPA's approval of the OGI Protocol, MPLX shall conduct its first semi-annual OGI monitoring of all Covered Equipment in accordance with the EPA approved OGI Protocol. OGI monitoring shall be conducted semi-annually after the first monitoring.~~
 - ~~ii. By no later than 30 Days after EPA's approval of the OGI Protocol, MPLX shall identify all Fin Fan Units at each Subject Gas Plant that are in light liquid and/or gas/vapor service, as defined in 40 C.F.R. § 60.481a, and MPLX shall commence to monitor all plugs on such Fin Fan Units, while operating, in accordance with the EPA approved OGI Protocol. OGI monitoring shall be conducted semi-annually after the first monitoring.~~
 - ~~iii. No later than 30 Days after EPA's approval of the OGI Protocol, MPLX shall comply with Paragraph 48.d. below.~~
- ~~d. Repairs of Leaks. This Paragraph applies to all Leaks that are detected during an OGI monitoring event regardless of whether such Leaks were found with the OGI Instrument or whether the Leaks are detected using OVA inspections during an OGI survey.~~
- ~~i. Covered Equipment: MPLX shall repair (or, if applicable, replace) and re-monitor Leaking Covered Equipment in accordance with Paragraphs 36-40.~~

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- ii. ~~Fin Fan Unit Plugs: With respect to Leaking Fin Fan Unit plugs, MPLX shall:~~
- a. ~~Perform a first attempt at repair no later than five Days after detecting a Leak;~~
 - b. ~~Repair the Leaking Fin Fan Unit plug (a) No later than 15 Days after detecting the Leak unless such repair requires a Process Unit Shutdown; or (b) If repair requires a Process Unit Shutdown, complete the repair no later than the end of the next Process Unit Shutdown; and~~
 - c. ~~Perform Repair Verification Monitoring in accordance with Paragraph 36.a.~~

DEQ interpretation: CD ¶ 48 is omitted because the OGI protocol has already been developed and EPA-approved (as of January 29, 2024, to be included in the PTCs as an Appendix). However, the PTC will include that compliance with this protocol is required.

- v. Pilot-Operated Modulating Pressure Relief Valves (Subsection D, CD ¶¶ 50-55)
- ~~(CD ¶ 50) As of the Effective Date of this Consent Decree, MPLX shall install and operate Bottom Dome Vent Piping on any new PORV that is or will be subject to the requirements of Subpart OOOOa, with the exception of the PORV categories identified in Paragraphs 50.a. or b.:~~
 - a. ~~Atmospheric PORVs that are not otherwise required to be routed through a closed vent system; or~~
 - b. ~~Snap-action PORVs.~~

DEQ Interpretation: CD ¶ 50 is omitted because no new PORV will be subject to NSPS OOOOa because construction, modification, or reconstruction cannot occur after September 18, 2015, and on or before December 6, 2022 for new units.

- ~~(CD ¶ 51) Beginning with the first full calendar Quarter after the Effective Date of the Consent Decree, MPLX shall monitor using Method 21 or the alternative work practice in accordance with 40 C.F.R. § 60.18(g) (i), the PORVs subject to Subpart OOOOa on a quarterly frequency, unless: (i) more frequent monitoring is required by federal, state, or local laws or regulations; or (ii) the relevant Covered Process Unit has been permanently shut down.~~

DEQ Interpretation: CD ¶ 51 is omitted because it already applies under 40 CFR 60.5397a(g) and 40 CFR 60.5401a(b)(1) for compressor stations and onshore natural gas processing plants respectively.

- (CD ¶ 52) MPLX shall repair all leaks of PORVs detected at or above 500 ppm in accordance with this Paragraph:

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- a. By no later than five Days after detecting a leak, MPLX shall perform a first attempt at repair of the PORV. By no later than 15 Days after detection, MPLX shall perform a final attempt at repair of the PORV or place it on the DOR list provided that MPLX has complied with all applicable regulations.

DEQ Interpretation: The 500 ppm LDAR requirement is found in NSPS OOOOa and already applies to all three facilities (40 CFR 60.5401a(b)(2) for onshore natural gas facilities and 40 CFR 60.5397a(a) for compressor stations). For onshore natural gas facilities, first attempt at repair and DOR timelines are already applicable under 40 CFR 60.5401a and 40 CFR 60.482-9a respectively. Stanley Compressor Station is subject to this requirement.

- ~~b. MPLX shall conduct Repair Verification Monitoring after repair of any leaks.~~

DEQ Interpretation: CD ¶ 52(b) is omitted because Repair Verification Monitoring is already required under 40 CFR 60.5397a(h)(4) and 40 CFR 60.482-9a for compressor stations and onshore natural gas processing plants respectively.

- c. For all PORVs placed on the DOR list, MPLX shall:
 - i. Require sign-off from the relevant process unit supervisor or person of similar authority that the PORV is technically infeasible to repair without a Process Unit Shutdown;
 - ii. Undertake monthly Method 21 monitoring of PORVs placed on the DOR list; and

DEQ Interpretation: CD ¶ 52(b)(ii) is not applicable to Robinson Lake Gas Plant and Belfield Gas Plant because they are required to monthly monitor valves under 40 CFR 60.482-7a. This requirement is applicable to Stanley Compressor Station.

- ~~iii. Repair the PORV within the time frame required by the applicable LDAR regulation.~~

DEQ Interpretation: CD ¶ 52(c)(iii) is omitted because it is already required under 40 CFR 60.5397a(h) and 60.5401a(b)(3) for compressor stations and onshore natural gas processing plants respectively.

- (CD ¶ 53) By no later than 180 Days after the Effective Date, MPLX shall install Bottom Dome Vapor Recovery Piping on any existing PORV, that is subject to Subpart OOOOa, and that has a Pre-existing Tap and Isolation Valve, with the exception of the PORV categories identified in Paragraphs 50.a. or 50.b.
- (CD ¶ 54) ~~For each leak identified under Paragraph 52 above, MPLX shall record the following information: the date the leak was identified and the Screening Value; the date of all repair attempts; the repair methods used during each repair attempt;~~

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~~the date, time, and Screening Values for all re-monitoring events; and, if applicable, documentation of compliance with Paragraph 52.c. for PORVs placed on the DOR list.~~

DEQ Interpretation: The above selection is omitted because it is already required for NSPS OOOOa affected facilities under 40 CFR 60.5420a.

- vi. ~~Subpart De as it applies to affected Small Hot Oil Heaters (Subsection E, CD ¶¶ 55-56)~~
- ~~(CD ¶ 55) By no later than 180 Days after the Effective Date, each steam generating unit at the Blacks Fork Facility with a design firing rate of 29 Megawatts (100 MMBtu/h) or less, but greater than or equal to 2.9 Megawatts (10 MMBtu/h) (“Small Hot Oil Heaters”), shall comply with 40 C.F.R. §§ 60.40e-48e (NSPS Subpart De) as set forth below.~~
 - ~~(CD ¶ 56) By no later than 180 Days after the Effective Date, MPLX shall submit an initial notification for each Small Hot Oil Heater subject to Paragraph 55, above, in accordance with 40 C.F.R. § 60.48e.~~

DEQ Interpretation: CD ¶ 71b(vi) is omitted because ¶¶ 55-56 are only applicable to Black Fork Facility, not to Stanley Compressor Station, Robinson Lake Gas Plant, or Belfield Gas Plant.

- vii. Subpart NNN as it applies to process units that are affected facilities (Subsection F, CD ¶¶ 57-58)
- (CD ¶ 57) Beginning no later than 180 Days after the Effective Date, the following Subject Gas Plants shall comply with Subpart NNN as specified in Paragraph 58 at Distillation Units that are “affected facilities” as defined under 40 C.F.R. § 60.660: Blacks Fork, Robinson Lake, and Belfield Gas Plants.

DEQ Interpretation: The requirement above is not applicable to Stanley Compressor Station. Robinson Lake Gas and Belfield Gas Plants both have distillation units pertaining to fractionation and related control devices (deethanizers, depropanizers, debutanizers, and the plant flare [FLARE-1 {2 as emergency} and FLR-1 respectively]) that are not typically interpreted to be subject to NSPS NNN. As a result of the CD, these two facilities will be subject to NSPS NNN.

- (CD ¶ 58) MPLX shall comply with 40 C.F.R. § 60.660(d) by complying with the provisions in 40 C.F.R. Part 65, Subpart D, to satisfy the requirements of 40 C.F.R. §§ 60.662 through 60.665 and 60.668.

DEQ Interpretation: 40 CFR 60.660(d) lists alternative compliance to Subpart NNN, and the CD requires compliance with Part 65 Subpart D—Process Vents (and also Subpart A and G by reference). Therefore, MPLX has designated each process stream as Group 1 and shall comply with these requirements.