

From: [Juarez, Allie M.](#)
To: [Gorog, Mark](#); [Tomko, Devin](#); [Guerrieri, Sheri](#)
Cc: [Wheldon, Nathan M.](#)
Subject: [External] RE: Harmon Creek Plan Approval Reductions
Date: Thursday, January 23, 2025 2:28:56 PM
Attachments: [image001.png](#)

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Hi all,

As discussed, MPLX is now proposing to conduct the additional semi-annual monitoring and leak repair on connectors and flanges using Method 21 rather than OGI.

Please let us know if you have any additional data needs.

Thanks you,
Allie

From: Juarez, Allie M.
Sent: Friday, January 17, 2025 11:19 AM
To: Gorog, Mark <mgorog@pa.gov>; Tomko, Devin <dtomko@pa.gov>; Guerrieri, Sheri <shguerrier@pa.gov>
Cc: Wheldon, Nathan M. <NMWheldon@marathonpetroleum.com>
Subject: Harmon Creek Plan Approval Reductions

Good morning Mark, Sheri, and Devin,

I am passing along some information that we pulled together:

MPLX is proposing a permit condition requiring semi-annual OGI monitoring and leak repair on connectors and flanges for a 90% reduction on the AP-42 factor. In the attached document from EPA, they estimate that a semi-annual OGI program has the results of reducing emissions by 60%. This is written in the 2nd paragraph on Page 52 of the attached document. Through Method 21 monitoring and AVO inspections we are able to achieve a 75% reduction rate from AP-42 according to TCEQ. By adding a semi-annual OGI monitoring program of connectors we can expect an additional 60% reduction, setting us at a 90% reduction from raw AP-42 emission rates.

Additionally, MPLX is proposing to take a permit condition requiring the installation of low-emission valves on valves 1" or greater for a 99% reduction on the AP-42 factor. The EPA definition of "Low-E valve" as presented in the MarkWest LDAR Consent Decree (page 16 of the CD) is listed below: "Low-Emission Valve" or Low-E Valve" shall mean either of the following :

- i. A valve (including its specific packing assembly of stem sealing component) for which the

manufacturer has issued a written warranty that it will not emit fugitives at greater than 100 ppm, and that, if it does so emit at greater than 100 ppm at any time in the first five years after installation the manufacturer will replace the valve; provided, however, that no valve shall qualify as “Low-E” by reason of written warranty unless the valve (including its specific packing assembly) either:

- a. first was test by the manufacturer or a qualified testing firm pursuant to the generally-accepted good engineering practices for testing fugitive emissions; or
 - b. is an “extension” of another valve that qualified as “Low-E” under Subparagraph i above; or
- ii. A valve (including its specific packing assembly) that:
- a. Has been tested by the manufacturer or a qualified testing firm pursuant to generally-accepted good engineering practices for testing fugitive emissions and that, during the test, at no time leaked at greater than 500 ppm, and on average, leaked at less than 100 ppm; or
 - b. Is an “extension” of another valve that qualified as “Low-E” under Subparagraph i above.

For purposes of Subparagraphs (i)(b) and (ii)(b), being an “extension of another valve” means that the characteristics of the valve that affect sealing performance (e.g., type of valve, stem motion, tolerances, surface finishes, loading arrangement, and stem and body seal material, design, and construction) are the same or essentially equivalent as between the tested and the untested valve.

Please see the summary of historical Harmon Creek LDAR VOC information to support the proposed reductions:

Based on AP-42 Correlation Equations from actual PPM readings during Method 21 Monitoring events.

	Actual Average Reduction from AP-42	Proposed Connector Reduction	Actual Average Valve Reduction from AP-42	Proposed Valve Reduction
Year	%	%	%	%
2020	95.28%	90%	99.61%	99%
2021	95.37%	90%	99.63%	99%
2022	96.25%	90%	99.63%	99%
2023	96.51%	90%	99.65%	99%
2024	95.65%	90%	99.56%	99%
5-year average	95.81%		99.62%	

Finally, MPLX is proposing to reduce the throughput on the open flare. Justification for the flare throughput was provided in response to technical deficiencies and the planned installation of a vapor recovery unit with a capacity of 2000 MSCFD is anticipated to reduce the throughput significantly. MPLX is proposing a throughput limit of 116.518 mmscf/yr, which includes sweep gas.

Can we schedule a meeting early next week to discuss any questions you may have? If you have any questions prior to that call, let us know.

Thank you!



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