UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C., 20460

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

August 22, 2019

Christopher Rimkus
Assistant General Counsel
MarkWest Energy Partners – L.P.
1515 Arapahoe St., Suite 1600
Denver, CO 80202
Christopher.rimkus@markwest.com

Re: Approval Regarding Revised Project Plan Documentation for Humphreys and Harmon Creek Supplemental Environmental Projects (SEPs)

Dear Mr. Rimkus,

Pursuant to the Consent Decree[1], MarkWest submitted to the United States Environmental Protection Agency (EPA) Monitoring Project Plan documentation for the Humphreys Compressor Station (Humphreys) Supplemental Environmental Project (SEP)[2], and the Harmon Creek Processing Plant (Harmon Creek) SEP[3] on July 22, 2019. MarkWest sought EPA approval of these submittals consistent with Consent Decree Paragraphs 28(b) and 28(c), and Appendices 7 and 8, and EPA's conditional approval memo dated March 13, 2019 that was sent to MarkWest in response to the project plan documentation submitted to EPA in November 2018. EPA has finalized its review of the revised submittals.

After review, EPA *conditionally approves* the Humphreys SEP documentation pursuant to Paragraph 28(b) of the Consent Decree. Similar to EPA's March 13, 2019 conditional approval correspondence, EPA requests that the documentation be updated to reflect that EPA collectively will perform the roles and functions that are currently assigned to EPA Region 3 and Region 5 staff, which includes removing signatures for EPA and making updates to various tables and sections regarding roles and responsibilities. EPA will provide signed correspondence, similar to this letter, that will notify MarkWest of EPA's approval of any documentation submitted pursuant to the Consent Decree, which will satisfy the approval requirements outlined in the Consent Decree. Furthermore, Ohio EPA (OEPA) is not a party to the Consent Decree, has no legal responsibility to perform any function or role in the SEP, and therefore, should not be included as a signatory to the project plan. In response to this approval, MarkWest shall take all actions required by the approved Humphreys SEP documentation, in accordance with the schedules and requirements of this documentation. EPA understands that the documentation will be minimally revised to include the requested update. Therefore, EPA requests that MarkWest submit a final version of the documentation to EPA for final review prior to actual implementation of the project. EPA requests this submission within 30 days of receipt of this

correspondence.

Upon review and in consultation with the Pennsylvania Department of Environmental Protection (PADEP), EPA *conditionally approves* the Harmon Creek SEP documentation pursuant to paragraph 28(c) of the Consent Decree. Conditional approval is granted with the additional requirement that MarkWest, within 30 days or such other time as the parties agree to in writing, correct all deficiencies identified in Attachment 1 (dated August 19, 2019), and resubmit the revised documentation to EPA and PADEP. Resubmission of the revised documentation shall include a reference(s) to all revisions made in response to the deficiencies detailed in Attachment 1. If the resubmission is approved in whole, MarkWest shall proceed in accordance with the schedules and requirements of the resubmitted Harmon Creek SEP documentation.

If you have any questions regarding EPA's review of this submittal, or wish to request a meeting in response to this letter, you may contact me at 202-564-7889 or [HYPERLINK "mailto:williams.christopher@epa.gov"].

Sincerely,

Christopher Williams
Chemical Engineer
U.S. EPA Office of Civil Enforcement
Air Enforcement Division

Enclosure:
Attachment 1 (dated August 19, 2019): Comments for Quality Assurance Project Plan for Harmon Creek Processing Plant from MarkWest dated July 2019 related to the MarkWest Consent Decree (no. 2:18-cv-00520-LPL).

cc: Mark R. Gorog, P.E., PADEP
Lori McNabb, PADEP
Michael Heilman, PADEP
Mark Elmer, U.S. DOJ
Kathryn Caballero, EPA HQ
Doug Snyder, EPA Region 3
Mary McAuliffe, EPA Region 5
Robert McHale, MarkWest

[1] *United States of America and Commonwealth of Pennsylvania Department of Environmental Protection vs. MarkWest Liberty Midstream & Resources, L.L.C., and Ohio Gathering Company, L.L.C.,* No. 2:18-cv-00520-LPL (W.D. Pa. entered July 9, 2018).
[2] Sonoma Technologies Inc, *Air Quality Monitoring Plan for Humphreys Compressor Station (Barnesville, Ohio),* October 31, 2018, and *Quality Assurance Project Plan (QAPP) Humphreys Compressor Station Ambient Air Monitoring,* October 31, 2018, Version: 1.0. Filename QAPP_Humphreys_3-18-2019.pdf
[3] Trinity Consultants MSI, *Monitoring & Quality Management Plan/Quality Assurance Project Plan for MarkWest's Harmon Creek Processing Plant Air Toxics Monitoring Stations,* July 2019, Revision: 0. Filename: MarkWest Harmon Creek QAPP_R0_071519.pdf