Air Quality Bureau
NOTICE OF VIOLATION

CASE NUMBER:	MWT-Multi-2201	**ICIS ENFORCEMENT ACTION ID:**	NM000A100303 and NM000A100304
COMPANY NAME:	MarkWest Tornado GP, LLC	**FACILITY NAME:**	Bell Lake South CS and Red Hills CS
PERMITS:	Bell Lake – NSR 8253M2 Red Hills— NSR 8436M2 and 8436M3	**SOURCE CLASS:**	SM>80
INSPECTION DATE:	July 7, 2022	**EARLIEST DISCOVERY:**	October 4, 2021
SELF-REPORTED:	No	***NRV, FRV OR HPV:**	FRV
FACILITY LOCATION:	NW of Jal in Lea County	**CONTACT PERSON:**	Becky Kileo
MAILING ADDRESS:	1515 Arapahoe St Tower 1 Suite 1600 Denver, CO 80202	**COUNTY:**	Lea
AGENCY INTEREST:	Bell Lake – 38910 Red Hills – 39108	**AQB AIRS #:**	Bell Lake – 350251634 Red Hills -- 350251700

This Notice of Violation is a written record of the AIR QUALITY BUREAU'S ("Bureau") finding that a violation of AIR QUALITY CONTROL REGULATIONS OR AIR QUALITY PERMIT CONDITIONS has occurred. A Notice is issued each time a violation is observed or discovered. This Notice may subject you to monetary penalties through administrative, civil, or criminal prosecution.

Each violation set forth in this NOV has been evaluated in accordance with EPA's Guidance on Federally-Reportable Violations for Clean Air Act Stationary Sources (September 2014) and Timely and Appropriate Enforcement Response to High Priority Violations (August 2014). The overall assessment of this enforcement case reflects the highest level determined. The Bureau has determined that the violations outlined in this document are Federally-Reportable Violations (FRVs).

If you have questions or believe any statement in this notice is erroneous, please contact Charles Butler, Enforcement Specialist, at (505) 660-6110 or charles.butler@env.nm.gov or Teresa McDill, Enforcement Manager, at (505) 629-8732 or teresa.mcdill@env.nm.gov. If you are represented by counsel, please contact Christopher Westenberger, Assistant General Counsel, at (505) 469-8862 or christopher.westenberger@env.nm.gov.

Elizabeth Kuehn
Digitally signed by Elizabeth Kuehn
Date: 2023.10.17 09:12:45 -06'00'

Air Quality Bureau Official **Date**

Company: MarkWest Tornado GP, LLC
Facility: Bell Lake South CS and Red Hills CS
Case #: MWT-Multi-2201
Permit #: Bell Lake – GCP O&G 8253M2; Red Hills – GCP O&G 8436M2 and 8436M3
Agency Interest #: Bell Lake – 38910
Red Hills – 39108

Inspection By: Linsey Hurst
Date of Discovery: October 4, 2021

NOV Prepared By: Charles Butler
NRV, FRV or HPV: FRV

AQB AIRS #: Bell Lake – 350251634
Red Hills -- 350251700

VIOLATION 1: General Construction Permit Oil and Gas (GCP-O&G) Specific Condition A106.C – *Allowable Hourly and Annual Emission Limits*

Number of Claims: 2416

Requirement:

GCP-O&G numbers 8253M2, 8436M2 and 8436M3, Specific Condition A106.C states in relevant part:

"For each regulated emission unit in the Registration Form, the emissions specified in the Registration Form shall be the allowable emission limits in this Permit. For each piece of equipment with an hourly emission limit established in the Registration Form, compliance shall be demonstrated by complying with the specific conditions for the emission unit in this Permit.

Compliance with the allowable annual emission limits shall be demonstrated by complying with the process parameters required for each piece of authorized equipment (e.g. tank throughput, engine test and/or run time, glycol circulation rates, control device inspection, etc.) as represented in the Registration Form."

The tables from the three permits' registration forms are included as Attachments 2, 3 and 4.

Description:

Between August 1, 2021, and June 30, 2022, MarkWest Tornado GP, LLC submitted three Excess Emission Reports (EERs). Two (2) EERs were for its Red Hills Compressor Station T-1 condensate tank. The first EER (Activity No. 039108-09272021-01) began July 8, 2021, and lasted August 12, 2021. The active permit during the event was GCP-O&G 8436M2. The second EER (Activity No. 039108-03292022-01) began on March 25, 2022, and ended on March 28, 2022. The active permit for that event was GCP-O&G 8436M3.

The third EER (Activity No. 038910-10292021-01) concerns the T-1 condensate tank at the company's Bell Lake South Compressor Station. The event began on July 8, 2021, and ended on September 8, 2021. The active permit during that event was GCP-O&G 8253M2. Together, the three events released an excess of 149,459 lbs of Volatile Organic Compounds (VOCs) or nearly 75 tons.

The EERs were submitted electronically via the Air Quality Bureau Compliance Reporting (AQBCR) application.

Conclusion:

MarkWest Tornado GP, LLC at the Bell Lake South Compressor Station and the Red Hills Compressor Station violated Section A106.C of their respective construction permits. Each hour exceeding permitted limits at each facility represents one claim, totaling 2,416 claims. Penalties will be assessed based on the total pounds emitted in excess of permitted limits.

Additional Information Required:

By 30 days after NOV date, MarkWest Tornado GP, LLC shall submit in writing the following information:

1. A description of the causes of these violations;
2. Documentation of the steps taken to correct the violation to date; and
3. Documentation of steps taken (or to be taken) to prevent the recurrence of this violation.

Company: MarkWest Tornado GP, LLC
Facility: Bell Lake South CS and Red Hills CS
Case #: MWT-Multi-2201
Permit #: Bell Lake – GCP O&G 8253M2; Red Hills – GCP O&G 8436M2 and 8436M3
Agency Interest #: Bell Lake – 38910
Red Hills – 39108

Inspection By: July 22, 2021
Date of Discovery: October 4, 2021

NOV Prepared By: Charles Butler
NRV, FRV or HPV: FRV

AQB AIRS #: Bell Lake – 350251634
Red Hills -- 350251700

VIOLATION 2: 20.2.7.110.A of the Administrative Code (NMAC)

Number of Claims: 3

Requirement:

With regards to when Excess Emission Reports (EERs) should be submitted, 20.2.7.110.A of NMAC states:

"(1) Initial report: the owner or operator shall file an initial report, no later than the end of the next regular business day after the time of discovery of an excess emission that includes all available information for each item in Subsection B of 20.2.7.110 NMAC.

(2) Final report: the owner or operator shall file a final report that contains specific and detailed information for each item in Subsection B of 20.2.7.110 NMAC, no later than ten (10) days after the end of the excess emission."

Description:

MarkWest Tornado, LLC submitted both the initial and final reports late for the event that occurred at their Red Hill Compressor Station from July 8 to August 12 of 2021. The initial report was due on September 24, 2021, and submitted three (3) days late on September 27, 2021. The final report was due August 26, 2021, and was submitted on October 4, 2021, which is thirty-nine (39) days late. For the Bell Lake South Compressor Station, the final EER for the event from July 8 to September 8 was due on August 26, 2021. It was submitted on October 4, 2021, which was thirty-seven (37) days late. The reports were submitted electronically via the Air Quality Bureau Compliance Reporting (AQBCR) application.

Conclusion:

MarkWest Tornado, LLC is in violation of 20.2.7.110.A of NMAC for submitting three late excess emissions reports at the Red Hills Compressor Station and the Bell Lake South Compressor Station. The three late reports represent three (3) claims.

Additional Information Required:

By 30 days after NOV date, MarkWest Tornado GP, LLC shall submit in writing the following information:

1. A description of the causes of these violations;
2. Documentation of the steps taken to correct the violation to date; and
3. Documentation of steps taken (or to be taken) to prevent the recurrence of this violation.

ADDITIONAL INFORMATION VERIFICATION

This form must be completed and signed by the facility's Responsible Official (Title V) or other designee and returned within 30 days of the receipt of the Notice of Violation. All additional information must be submitted according to each violation's instructions. Documentation for additional information (in addition to this form) must be submitted electronically no later than the dates specified for each violation to Enforcement Specialist Charles Butler at charles.butler@env.nm.gov or Enforcement Manager Teresa McDill at teresa.mcdill@env.nm.gov.

All submittals must be submitted using the Reporting Submittal Form. The Reporting Submittal Form and instructions can be located at: https://www.env.nm.gov/air-quality/compliance-and-enforcement/#.

Please note that your facility now appears on the Department's Enforcement Watch as a result of this NOV (see: https://www.env.nm.gov/enforcement-watch/). Further the Department will issue a press release to local media highlighting your facility as appearing on this webpage. Your facility will remain on the Enforcement Watch website as an active matter until this matter is fully resolved, including the payment of the assessed civil penalty.

I hereby verify that Markwest Tornado GP, LLC has initiated the required additional information response outlined in this Notice of Violation. The following information has been submitted or will be submitted by the dates indicated below for each violation. All required documentation will be submitted electronically within 30 days of the receipt of the Notice of Violation.

Date NOV received: _____

Alleged Violation 1

_____ *A description of the cause of the violation*

_____ *Documentation of the steps taken to correct the violation to date*

_____ *Documentation of steps taken (or to be taken) to prevent recurrence of this violation*

Alleged Violation 2

_____ *A description of the cause of the violation*

_____ *Documentation of the steps taken to correct the violation to date*

_____ *Documentation of steps taken (or to be taken) to prevent recurrence of this violation*

_____ _____

Signature **Date**

Printed Name:

Title:

MRT-Multi-2201 NOV Attachment #1 Relevant Information from Excess Emission Reports

Facility	Event Start Date	Event Start Time	Event End Date	Event End Time	Duration (Hours)	Initial Report Due Date	Initial Report Submittal Date	Initial Report Days Late	Final Report Due Date	Final Report Submittal Date	Final Report Days Late	VOCs Emitted (lbs)
Red Hills Compressor Station	7/8/2021	17:15:00	8/12/2021	17:00:00	840	9/24/2021	9/27/2021	3	8/26/2021	10/4/2021	39	119523
Red Hills Compressor Station	3/25/2022	3:30:00	3/28/2022	18:43:00	88	3/30/2022	3/29/2022	0	4/11/2022	4/8/2022	0	9049
Bell Lake South Compressor Station	7/8/2021	17:15	9/8/2021	17:00	1488	11/1/2021	10/29/2021	0	9/22/2021	10/29/2021	37	20887

MRT-Multi-2201 NOV Attachment #2 Table 2-E: Requested Allowable Emissions from OGC-O&G 8253M2

Table 2-E: Requested Allowable Emissions

Enter an allowable emission limit for each piece of equipment with either an uncontrolled emission rate greater than 1 lb/hr or 1 ton per year (tpy) or a controlled emission rate of any amount. For H2S please represent all emissions even if they are less than 1 lb/hr and 1 tpy. If selecting combustion SSM emissions, enter lb/hr and tpy values. If selecting up to 10 tpy of Malfunction VOC emissions, enter tpy values. Combustion emissions from malfunction events are **not authorized** under this permit. Fill all cells in this table with the emissions in lb/hr and tpy, or a "-" symbol. A "-" symbol indicates that emissions of this pollutant are not expected. Total the emissions from all equipment in the Totals row. Add additional rows as necessary. Unit & stack numbering must be consistent throughout the application package. Numbers shall be expressed to at least 2 decimal points (e.g. 0.41, 1.41, or $1.41E^{+4}$).

Unit No.	NOx		CO		VOC		SOx		PM10		PM2.5		H_2S		Lead	
	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
ENG-1	2.78	12.16	1.17	5.13	3.17	13.86	0.0080	0.035	0.24	1.07	0.24	1.07	-	-	-	-
ENG-2	1.67	7.33	1.33	5.82	3.32	14.53	0.0081	0.036	0.25	1.09	0.25	1.09	-	-	-	-
ENG-3	1.53	6.71	0.59	2.58	0.97	4.23	0.0050	0.022	0.15	0.65	0.15	0.65	-	-	-	-
ENG-4	1.49	6.52	0.90	3.92	0.75	3.26	0.0057	0.025	0.17	0.74	0.17	0.74	-	-	-	-
ENG-5	1.49	6.52	0.90	3.92	0.75	3.26	0.0057	0.025	0.17	0.74	0.17	0.74	-	-	-	-
ENG-6	1.49	6.52	0.90	3.92	0.75	3.26	0.0057	0.025	0.17	0.74	0.17	0.74	-	-	-	-
ENG-7	1.49	6.52	0.90	3.92	0.75	3.26	0.0057	0.025	0.17	0.74	0.17	0.74	-	-	-	-
ENG-8	1.49	6.52	0.90	3.92	0.75	3.26	0.0057	0.025	0.17	0.74	0.17	0.74	-	-	-	-
ENG-9	1.49	6.52	0.90	3.92	0.75	3.26	0.0057	0.025	0.17	0.74	0.17	0.74	-	-	-	-
ROD-PK	-	-	-	-	0.32	1.39	-	-	-	-	-	-	1.55E-05	6.80E-05	-	-
Dehy-1[1]	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Reboil-1	0.15	0.64	0.12	0.54	0.0081	0.035	0.016	0.070	0.011	0.049	0.011	0.049	4.48E-04	0.0020	-	-
T-1[2]	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
T-2[2]	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
ECD-1	0.26	1.15	0.22	0.96	1.19	5.23	0.0079	0.035	0.020	0.087	0.020	0.087	6.13E-05	2.69E-04	-	-
ECD-2	0.076	0.33	0.064	0.28	0.16	0.69	0.0024	0.011	0.0058	0.025	0.0058	0.025	7.85E-05	3.44E-04	-	-
Fug-1	-	-	-	-	4.47	19.60	-	-	-	-	-	-	1.58E-04	6.94E-04	-	-
SSM	-	-	-	-	*	10.00	-	-	-	-	-	-	-	-	-	-
M	-	-	-	-	*	10.00	-	-	-	-	-	-	-	-	-	-
Totals	15.39	67.42	8.87	38.85	18.07	99.14	0.082	0.36	1.69	7.39	1.69	7.39	7.62E-04	0.0033	-	-

"-" Indicates emissions of this pollutant are not expected

"*" Indicates that an hourly emission limit is not appropriate for this unit and pollutant.

[1] Glycol dehydrator emissions are controlled by a condenser and a combustor. Controlled emissions are represented under Unit ECD-2.

[2] Units T-1 and T-2 are controlled by the ECD and emissions are represented under Unit ECD-1.

MRT-Multi-2201 NOV Attachment #3 Table 2-E: Requested Allowable Emissions from OGC-O&G 8436M2

Table 2-E: Requested Allowable Emissions

Enter an allowable emission limit for each piece of equipment with either an uncontrolled emission rate greater than 1 lb/hr or 1 ton per year (tpy) or a controlled emission rate of any amount. For H2S please represent all emissions even if they are less than 1 lb/hr and 1 tpy. If selecting combustion SSM emissions, enter lb/hr and tpy values. If selecting up to 10 tpy of Malfunction VOC emissions, enter tpy values. Combustion emissions from malfunction events are **not authorized** under this permit. Fill all cells in this table with the emissions in lb/hr and tpy, or a "-" symbol. A "-" symbol indicates that emissions of this pollutant are not expected. Total the emissions from all equipment in the Totals row. Add additional rows as necessary. Unit & stack numbering must be consistent throughout the application package. Numbers shall be expressed to at least 2 decimal points (e.g. 0.41, 1.41, or $1.41E^{-4}$).

Unit No.	NOx		CO		VOC		SOx		PM10		PM2.5		H_2S		Lead	
	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
ENG-1	1.67	7.33	1.39	6.09	3.46	15.17	0.010	0.045	0.20	0.86	0.20	0.86	-	-	-	-
ENG-3	1.53	6.71	0.62	2.70	1.01	4.42	0.0063	0.027	0.12	0.52	0.12	0.52	-	-	-	-
ENG-4	1.53	6.71	0.62	2.70	1.01	4.42	0.0063	0.027	0.12	0.52	0.12	0.52	-	-	-	-
ENG-5	1.53	6.71	0.62	2.70	1.01	4.42	0.0063	0.027	0.12	0.52	0.12	0.52	-	-	-	-
ENG-6	1.49	6.52	0.94	4.11	0.78	3.40	0.0071	0.031	0.13	0.59	0.13	0.59	-	-	-	-
ENG-7	1.49	6.52	0.94	4.11	0.78	3.40	0.0071	0.031	0.13	0.59	0.13	0.59	-	-	-	-
ENG-8	1.49	6.52	0.94	4.11	0.78	3.40	0.0071	0.031	0.13	0.59	0.13	0.59	-	-	-	-
ENG-9	1.53	6.71	0.62	2.70	1.01	4.42	0.0063	0.027	0.12	0.52	0.12	0.52	-	-	-	-
ENG-10	1.49	6.52	0.94	4.11	0.78	3.40	0.0071	0.031	0.13	0.59	0.13	0.59	-	-	-	-
ENG-11	1.49	6.52	0.94	4.11	0.78	3.40	0.0071	0.031	0.13	0.59	0.13	0.59	-	-	-	-
ROD-PK	-	-	-	-	0.36	1.59	-	-	-	-	-	-	1.99E-05	8.71E-05	-	-
Dehy-1[1]	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Reboil-1	0.15	0.64	0.12	0.54	0.0081	0.035	0.020	0.088	0.011	0.049	0.011	0.049	5.64E-04	0.0025	-	-
T-1[2]	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
T-2[2]	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
ECD-1	0.34	1.48	0.28	1.25	1.57	6.86	0.0079	0.035	0.026	0.113	0.026	0.113	7.58E-05	3.32E-04	-	-
ECD-2	0.086	0.38	0.072	0.32	0.20	0.86	0.0024	0.011	0.0066	0.029	0.0066	0.029	1.08E-05	4.72E-05	-	-
Fug-1	-	-	-	-	4.39	19.22	-	-	-	-	-	-	1.58E-04	6.92E-04	-	-
SSM	-	-	-	-	*	10.00	-	-	-	-	-	-	-	-	-	-
M	-	-	-	-	*	10.00	-	-	-	-	-	-	-	-	-	-
Totals	15.81	69.26	9.03	39.57	17.91	98.43	0.10	0.44	1.39	6.07	1.39	6.07	8.28E-04	0.0036	-	-

"-" Indicates emissions of this pollutant are not expected

"*" Indicates that an hourly emission limit is not appropriate for this unit and pollutant.

[1]Glycol dehydrator emissions are controlled by a condenser and a combustor. Controlled emissions are represented under Unit ECD-2.

[2] Units T-1 and T-2 are controlled by the ECD and emissions are represented under Unit ECD-1.

MRT-Multi-2201 NOV Attachment #4 Table 2-E: Requested Allowable Emissions from OGC-O&G 8436M3

Table 2-E: Requested Allowable Emissions

Enter an allowable emission limit for each piece of equipment with either an uncontrolled emission rate greater than 1 lb/hr or 1 ton per year (tpy) or a controlled emission rate of any amount. For H2S please represent all emissions even if they are less than 1 lb/hr and 1 tpy. If selecting combustion SSM emissions, enter lb/hr and tpy values. If selecting up to 10 tpy of Malfunction VOC emissions, enter tpy values. Combustion emissions from malfunction events are **not authorized** under this permit. Fill all cells in this table with the emissions in lb/hr and tpy, or a "-" symbol. A "-" symbol indicates that emissions of this pollutant are not expected. Total the emissions from all equipment in the Totals row. Add additional rows as necessary. Unit & stack numbering must be consistent throughout the application package. Numbers shall be expressed to at least 2 decimal points (e.g. 0.41, 1.41, or $1.41E^{-4}$).

Unit No.	NOx		CO		VOC		SOx		PM10		PM2.5		H_2S		Lead	
	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
ENG-1	1.84	8.06	1.39	6.09	3.47	15.22	0.0076	0.033	0.26	1.16	0.26	1.16	-	-	-	-
ENG-2	1.69	7.38	0.62	2.70	1.01	4.43	0.0047	0.021	0.16	0.70	0.16	0.70	-	-	-	-
ENG-3	1.69	7.38	0.62	2.70	1.01	4.43	0.0047	0.021	0.16	0.70	0.16	0.70	-	-	-	-
ENG-4	1.69	7.38	0.62	2.70	1.01	4.43	0.0047	0.021	0.16	0.70	0.16	0.70	-	-	-	-
ENG-5	1.64	7.17	0.94	4.11	0.78	3.42	0.0053	0.023	0.18	0.78	0.18	0.78	-	-	-	-
ENG-6	1.64	7.17	0.94	4.11	0.78	3.42	0.0053	0.023	0.18	0.78	0.18	0.78	-	-	-	-
ENG-7	1.64	7.17	0.94	4.11	0.78	3.42	0.0053	0.023	0.18	0.78	0.18	0.78	-	-	-	-
ENG-8	1.69	7.38	0.62	2.70	1.01	4.43	0.0047	0.021	0.16	0.70	0.16	0.70	-	-	-	-
ENG-9	1.64	7.17	0.94	4.11	0.78	3.42	0.0053	0.023	0.18	0.78	0.18	0.78	-	-	-	-
ENG-10	1.64	7.17	0.94	4.11	0.78	3.42	0.0053	0.023	0.18	0.78	0.18	0.78	-	-	-	-
ENG-11	1.64	7.17	0.94	4.11	0.78	3.42	0.0053	0.023	0.18	0.78	0.18	0.78	-	-	-	-
ROD-PK	-	-	-	-	0.53	2.31	-	-	-	-	-	-	2.28E-05	9.97E-05	-	-
Dehy-1[1]	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Reboil-1	0.15	0.64	0.12	0.54	0.0081	0.035	0.0060	0.026	0.011	0.049	0.011	0.049	4.20E-04	0.0018	-	-
T-1[2]	-	-	-	-	1.10	0.25	-	-	-	-	-	-	1.53E-05	3.48E-06	-	-
T-2[2]	-	-	-	-	1.10	0.25	-	-	-	-	-	-	1.53E-05	3.48E-06	-	-
T-GB[2]	-	-	-	-	17.80	4.06	-	-	-	-	-	-	4.81E-04	1.10E-04	-	-
ECD-1	5.25	0.22	4.41	0.18	3.04	0.76	0.024	0.0086	0.40	0.016	0.40	0.016	2.54E-04	6.65E-05	-	-
ECD-2	0.23	0.11	0.20	0.10	0.18	0.79	0.030	0.13	0.018	0.0087	0.018	0.0087	3.26E-04	1.43E-03	-	-
C-LOAD	-	-	-	-	0.10	0.42	-	-	-	-	-	-	2.28E-05	5.20E-06	-	-
Fug-1	-	-	-	-	5.82	25.47	-	-	-	-	-	-	1.75E-04	7.66E-04	-	-
SSM	-	-	-	-	*	10.00	-	-	-	-	-	-	-	-	-	-
M	-	-	-	-	*	10.00	-	-	-	-	-	-	-	-	-	-
Totals	24.03	81.57	14.22	42.39	41.89	107.84	0.12	0.42	2.40	8.72	2.40	8.72	0.0017	0.0043	-	-
Totals (without fugitives)	24.03	81.57	14.22	42.39	36.07	82.37	0.12	0.42	2.40	8.72	2.40	8.72	0.0016	0.0036	-	-

"-" Indicates emissions of this pollutant are not expected

"*" Indicates that an hourly emission limit is not appropriate for this unit and pollutant.

[1] Flash tank off gas emissions are controlled by a vapor recovery unit (VRU). Emissions are routed to a combuster (ECD-1) during VRU downtime, which is assumed to be 500 hr/yr. Regenerator emissions are controlled by a BTEX condenser and combustor (Unit ECD-2).

[2] Units T-GB, T-1, and T-2 are controlled by a vapor recovery unit (VRU). Emissions are routed to a combuster (ECD-1) during VRU downtime, which is assumed to be 500 hr/yr.