REGION 8
DENVER, CO 80202

April 3, 2024

VIA EMAIL ONLY
READ RECEIPT REQUESTED

Mr. Dwayne Burks
Vice President of
Operations Targa
Badlands, LLC
dburks@targaresources.com

Re: Notice of Violation to Targa Badlands, LLC CAA-08-2024-0009

Dear Mr. Burks:

The U.S. Environmental Protection Agency (EPA) is issuing Targa Badlands, LLC (Targa) the enclosed Notice of Violation (NOV) and offering an opportunity to confer regarding alleged violations of the Clean Air Act (the Act) and its implementing regulations.

Specifically, the EPA alleges that Targa has violated or is violating:

1. The Standards of Performance for Stationary Spark Ignition Internal Combustion Engines under 40 C.F.R. Part 60, Subpart JJJJ;
2. The Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification, or Reconstruction Commenced After August 23, 2011, and on or Before September 18, 2015, under 40 C.F.R. Part 60, Subpart OOOO;
3. The Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced After September 18, 2015 under 40 C.F.R. Part 60, Subpart OOOOa;
4. The National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities under 40 C.F.R. Part 63, Subpart HH; and
5. The National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines under 40 C.F.R. Part 63, Subpart ZZZZ.

To reach a timely conclusion of this matter, the EPA would like to hold an initial meeting within 45 calendar days of your receipt of this letter. To schedule this meeting, please have your counsel call or email Nick DiMascio, Senior Assistant Regional Counsel for EPA Region 8, at (303) 312-6759 or dimascio.nicholas@epa.gov within 15 calendar days following receipt of this letter.

Sincerely,

SUZANNE BOHAN Digitally signed by SUZANNE BOHAN
Date: 2024.04.03 14:41:44 -06'00'

Suzanne J. Bohan, Director
Enforcement and Compliance Assurance Division

Enclosures
1 Notice of Violation
2 Appendix A

cc (w/Encl.):
Chairman Mark Fox, MHA Nation
Lisa Lonefight, Senior Science Advisor, MHA Nation
Edmund Baker, Director, MHA Environmental Programs
Kenny Lyson, Director, MHA Energy
Sal Beston, Compliance Manager, MHA Energy
Hesston Hedges, North Dakota Environmental Coordinator, Targa Badlands, LLC
Theresa Merrell, Environmental Advisor, Targa Badlands, LLC
Mitchell W. Anderson, Senior Environmental Specialist, Targa Badlands, LLC

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

IN THE MATTER OF:	)	**NOTICE OF VIOLATION**
	)	
Targa Badlands, LLC	)	**EPA Docket No.** CAA-08-2024-0009
811 Louisiana St, Suite 2100	)	
Houston, Texas 77022	)	Proceedings Pursuant to
	)	the Clean Air Act,
	)	42 U.S.C. §§ 7401-7671q
	)	

NOTICE OF VIOLATION

The U.S. Environmental Protection Agency (EPA) alleges Targa Badlands, LLC (Targa) has violated or is violating the Clean Air Act (the Act), specifically: the Standards of Performance for Stationary Spark Ignition Internal Combustion Engines under 40 C.F.R. Part 60, Subpart JJJJ; the Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification, or Reconstruction Commenced After August 23, 2011, and on or Before September 18, 2015 under 40 C.F.R. Part 60, Subpart OOOO; the Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 under 40 C.F.R. Part 60, Subpart OOOOa; the National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities under 40 C.F.R. Part 63, Subpart HH; and the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines under 40 C.F.R. Part 63, Subpart ZZZZ.

I. STATUTORY AND REGULATORY BACKGROUND

1. The Act's purpose is "to protect and enhance the quality of the Nation's air resources so as to promote the public health and welfare and the productive capacity of its population." 42 U.S.C. § 7401(b)(1).
2. Section 108 of the Act, 42 U.S.C. § 7408, directs the EPA to identify pollutants that "may reasonably be anticipated to endanger public health or welfare" and to issue air quality criteria based on the "latest scientific knowledge" about the effects of the

pollutants on public health and the environment. These pollutants are known as "criteria pollutants."

A. New Source Performance Standards

3. Section 111(b) of the Act authorizes the Administrator of the EPA to promulgate standards of performance applicable to "new sources" within categories of sources that cause "air pollution which may reasonably be anticipated to endanger public health or welfare." 42 U.S.C. § 7411(b).
4. A "new source" is any stationary source, the construction or modification of which is commenced after the promulgation of the standards of performance that will apply to such source. 42 U.S.C. § 7411(a)(2).
5. A "stationary source" is a building, structure, facility, or installation that emits or may emit any air pollutant. 42 U.S.C. § 7411(a)(3).
6. It is unlawful for owners or operators of any new source to operate in violation of applicable standards of performance after the standards have gone into effect. 42 U.S.C. § 7411(e).

1. 40 C.F.R. Part 60, Subpart JJJJ (NSPS JJJJ)

7. In 2008, the EPA promulgated "Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines" under Section 111 of the Act, 73 Fed. Reg. 3591 (Jan. 18, 2008). These standards are set forth in 40 C.F.R., Part 60, Subpart JJJJ.
8. The provisions of NSPS JJJJ are applicable to manufacturers, owners, and operators of stationary spark ignition (SI) internal combustion engines (ICE).
9. The "date that construction commences" is the date the engine is ordered by the owner or operator. 40 C.F.R. § 60.4230(a).
10. Owners and operators of lean burn stationary SI ICE are subject to the requirements of NSPS JJJJ if the maximum engine power is greater than 500 horsepower (HP) and less than 1,350 HP if the stationary SI ICE is manufactured on or after January 1, 2008. 40 C.F.R. § 60.4230(a)(4)(ii).

11. An owner or operator of a stationary SI ICE manufactured after January 1, 2008, that is subject to 40 C.F.R. § 60.4233(e) must comply with the emission standards in Table 1 of Subpart JJJJ over the entire life of the engine. 40 C.F.R. § 60.4234.

2. 40 C.F.R. Part 60, Subpart OOOO (NSPS OOOO)

12. In 2012, the EPA promulgated "Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution" under Section 111 of the Clean Air Act. 77 Fed. Reg. 49,542 (Aug. 16, 2012). These standards are set forth in 40 C.F.R part 60, Subpart OOOO, which includes 40 C.F.R. §§ 60.5360–5430.
13. Each of these standards is a "standard of performance" within the meaning of Section 111(a)(1) of the Clean Air Act, 42 U.S.C. § 7411(a)(1), or a "design, equipment, work practice, or operational standard, or combination thereof" under Section 111(h) of the Clean Air Act, 42 U.S.C. § 7411(h).
14. NSPS OOOO applies to "affected facilities" for which owners or operators commence construction, modification, or reconstruction after August 23, 2011, and on or before September 18, 2015. 40 C.F.R. § 60.5365.
15. A "reciprocating compressor affected facility" under NSPS OOOO includes a single reciprocating compressor. 40 C.F.R § 60.5365(c).
16. NSPS OOOO requires reciprocating compressor affected facilities to comply with one of the rod packing requirements of 40 C.F.R. § 60.5385(a)(1)-(3).
17. A "storage vessel affected facility" under NSPS OOOO includes a single storage vessel located in the natural gas production segment that has the potential for volatile organic compounds (VOC) emissions equal to or greater than 6 tons per year (tpy), as determined according to 40 C.F.R. § 60.5365(e).
18. NSPS OOOO requires "[a]t all times, including periods of startup, shutdown, and malfunction, owners and operators shall maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions." 40 C.F.R. § 60.5370(b).
19. NSPS OOOO requires storage vessel affected facilities that utilize a control device to be equipped with a cover that meets the requirements of 40 C.F.R. § 60.5411(b) and is connected through a closed vent system that meets the requirements of

§ 60.5411(c), and emissions must be routed to a control device that meets the conditions specified in § 60.5412(c) and (d). 40 C.F.R. § 60.5395(e)(1).

3. 40 C.F.R. Part 60, Subpart OOOOa (NSPS OOOOa)

20. In 2016, the EPA promulgated "Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015" under Section 111 of the Clean Air Act. 81 Fed. Reg. 35,824 (June 3, 2016). These standards are set forth in 40 C.F.R Part 60, Subpart OOOOa, which includes 40 C.F.R. §§ 60.5360a–5432a.[1]
21. Each of these standards is a "standard of performance" within the meaning of Section 111(a)(1) of the Clean Air Act, 42 U.S.C. § 7411(a)(1), or a "design, equipment, work practice, or operational standard, or combination thereof" under Section 111(h) of the Clean Air Act, 42 U.S.C. § 7411(h).
22. NSPS OOOOa applies to "affected facilities" for which owners or operators commence construction, modification or reconstruction after September 18, 2015. 40 C.F.R. § 60.5365a.
23. A "reciprocating compressor affected facility" under NSPS OOOOa includes a single reciprocating compressor. 40 C.F.R § 60.5365a(c).
24. NSPS OOOOa requires reciprocating compressor affected facilities to comply with one of the rod packing requirements of 40 C.F.R. § 60.5385a(a)(1)-(3).
25. A "storage vessel affected facility" under NSPS OOOOa includes a single storage vessel that has the potential for VOC emissions equal to or greater than 6 tpy, as determined according to 40 C.F.R. § 60.5365a(e).
26. NSPS OOOOa requires "[a]t all times, including periods of startup, shutdown, and malfunction, owners and operators shall maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with

[1] Following promulgation of the 2016 final rule, the EPA granted reconsideration of fugitive emission requirements at well sites and compressor stations, well-site pneumatic pump standards, and the requirements for professional engineer certification of closed vent systems. 82 Fed. Reg. 25,730 (June 5, 2017); 83 Fed. Reg. 52,056 (Oct. 15, 2018). This reconsideration does not affect the allegations in this Notice of Violation.

good air pollution control practice for minimizing emissions." 40 C.F.R. § 60.5370a(b).

27. NSPS OOOOa requires storage vessel affected facilities that utilize a control device to be equipped with a cover that meets the requirements of 40 C.F.R. § 60.5411a(b) and is connected through a closed vent system that meets the requirements of § 60.5411a(c) and (d), and emissions must be routed to a control device that meets the conditions specified in § 60.5412(c) and (d). 40 C.F.R. § 60.5395a(b)(1).

B. National Emissions Standards for Hazardous Air Pollutants

28. In 1990, the EPA established emission standards that require the maximum degree of reduction in emissions of hazardous air pollutants (HAP) in Section 112 of the Act. 42 U.S.C. § 7412.

29. A "major source" of HAP is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit considering controls, in the aggregate, 10 tpy or more of any HAP or 25 tpy or more of any combination of HAP. 42 U.S.C. § 7412(a)(1).

1. 40 C.F.R. Part 63, Subpart HH (NESHAP HH)

30. In 1999, the EPA promulgated "Subpart HH—National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities" under section 112 of the Act, 64 Fed. Reg. 32628 (July 17, 1999). These standards are set forth in 40 C.F.R., part 63, subpart HH, which includes §§ 63.760–777.

31. Subpart HH defines a "glycol dehydration unit" to mean a device in which a liquid glycol absorbent (including, but not limited to, ethylene glycol, diethylene glycol, or triethylene glycol) directly contacts a natural gas stream and absorbs water in a contact tower or absorption column (absorber). The glycol contacts and absorbs water vapor and other gas stream constituents from the natural gas and becomes "rich" glycol. This glycol is then regenerated in the glycol dehydration unit reboiler. The "lean" glycol is then recycled. 40 C.F.R. § 63.761.

32. Subpart HH defines Urban Area (UA) plus offset and Urban Cluster (UC) as the area occupied by each urbanized area, each urban cluster that contains at least

10,000 people, and the area located two miles or less from each urbanized area boundary. 40 C.F.R. § 63.761.

33. For purposes of Subpart HH, "major source" has the same meaning as in 40 C.F.R. § 63.2, except that certain emissions points are not aggregated to determine whether such emissions points are major sources. 40 C.F.R. § 63.761.

34. "Area source" means any stationary source of hazardous air pollutants that is not a major source as defined in 40 C.F.R. Part 63. 40 C.F.R. § 63.2.

35. For area sources, the affected source for purposes of Subpart HH include each triethylene glycol (TEG) dehydration unit located at a facility that meets the criteria specified in 40 C.F.R. § 63.760(a). 40 C.F.R. § 63.760(b)(2).

36. For each TEG dehydration unit, the owner or operator must determine the optimum glycol circulation rate using the equation specified at 40 C.F.R. § 63.764(d)(2)(i) or the alternate method specified at 40 C.F.R. § 63.764(d)(2)(ii).

37. The TEG dehydration unit must be operated such that the actual glycol circulation rate does not exceed the optimum glycol circulation rate. 40 C.F.R. § 63.764(d)(2)(ii).

2. 40 C.F.R. Part 63, Subpart ZZZZ (NESHAP ZZZZ)

38. In 2004, the EPA promulgated "National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines" under section 112 of the Clean Air Act. 69 Fed. Reg. 33506 (June 15, 2004). These standards are set forth in 40 C.F.R part 63, Subpart ZZZZ, which includes 40 C.F.R. §§ 63.6580a–6675.

39. NESHAP ZZZZ establishes national emission limitations and operating limitations for HAP emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations. 40 C.F.R. § 63.6580.

40. NESHAP ZZZZ applies to owners or operators of stationary RICE at a major or area source of HAP emissions. 40 C.F.R. § 63.6585.

41. For oil and gas production facilities, a major source of HAP emissions is each surface site that emits or has the potential to emit any single HAP at or above 10

tpy (9.07 megagrams) or any combination of HAP at or above 25 tpy (22.68 megagrams). 40 C.F.R. § 63.6585(b).

42. An area source of HAP emissions is a source that is not a major source. 40 C.F.R. § 63.6585(c).

43. An affected new stationary RICE is any stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions which commenced construction of the stationary RICE on or after December 19, 2002. 40 C.F.R. § 63.6590(a)(2)(i).

44. Owners and operators that start up a new or reconstructed stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions after August 16, 2004 must comply with the applicable emission limitations and operating limitations of NESHAP ZZZZ upon startup of the affected source. 40 C.F.R. § 63.6595(a)(3).

45. Owners and operators of an area source that increases its emissions or its potential to emit such that it becomes a major source of HAP must be in compliance with NESHAP ZZZZ as specified below:

    a. Any stationary RICE for which construction or reconstruction is commenced after the date when your area source becomes a major source of HAP must be in compliance with this subpart upon startup of your affected source. 40 C.F.R. § 63.6595(b)(1).

    b. Any stationary RICE for which construction or reconstruction is commenced before your area source becomes a major source of HAP must be in compliance with the provisions of this subpart that are applicable to RICE located at major sources within 3 years after your area source becomes a major source of HAP. 40 C.F.R. § 63.6595(b)(2).

46. For stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, owners and operators must comply with the numerical emissions limit and operating limitations for stationary RICE as specified in 40 C.F.R. § 63.6600(a) and (b).

47. Owners and operators also must comply with the general requirements as specified in 40 C.F.R. § 63.6605, including operating and maintaining any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.

C. Title V Operating Permits

48. Title V of the Act, 42 U.S.C. §§ 7661-7661f, establishes a permit program for any "major sources" of air pollution, as defined by Title V or a major stationary source required to have a PSD permit. 42 U.S.C. § 7661a(a).

49. The purpose of Title V is to ensure all "applicable requirements" that apply to a source regulated under the Act are collected in one permit. *Id.* § 7661c(a).

50. In accordance with section 502(b) of the Act, 42 U.S.C. § 7661a(b), EPA promulgated regulations implementing Title V of the Act. *See* 61 Fed. Reg. 34228 (July 1, 1996). Those regulations for federal air quality operating permit programs are codified at 40 C.F.R. Part 71.

51. Section 502(a) of the Act, 42 U.S.C. § 7661a(a), and 40 C.F.R. § 71.7(b) provide that, after the effective date of any permit program approved or promulgated under Title V of the Act, no source subject to Title V may operate except as in compliance with a Title V operating permit (Title V Permit).

II. FACTUAL BACKGROUND & FINDINGS OF VIOLATION

A. Factual Background

52. Targa owns or operates compressor stations on the Fort Berthold Indian Reservation in North Dakota.

53. Targa received Title V permits issued by the EPA for the following facilities ("the Facilities"):

a. Clarks Creek Compressor Station (Clarks Creek), Title V permit number: V-TAT-000671-2013.00, effective November 4, 2019.

b. Blue Buttes Compressor Station and Pump Station (Blue Buttes), Title V permit number: V-TAT-000676-2014.00, effective date January 22, 2020.

c. TAT-Blue Buttes Compressor Station (TAT-Blue Buttes), Title V permit number: V-TAT-000839-2018.01, effective date February 10, 2021.

d. Junction Compressor Station (Junction), Title V permit number: V-TAT-000670-2015.00, effective date December 30, 2019.

e. Roberts Trust Compressor Station (Roberts Trust), Title V permit number: V-TAT-000752-2019.01, effective date October 4, 2021.

f. Johnson Compressor Station (Johnson), Title V permit number: V-TAT-000611.2017.01, effective date February 10, 2021.

54. On June 15, 2023, the EPA conducted inspections of the following compressor stations owned and operated by Targa: Clarks Creek, Blue Buttes, TAT-Blue Buttes, Junction, Roberts Trust and Johnson (the Facilities).

55. On August 14, 2023, the EPA issued inspection reports to Targa detailing the findings during the onsite inspection and subsequent records review at the Facilities.

B. Findings of Violation

56. For each of the following sources, Targa has violated Sections 111(e) and 502a of the Act and Parts 60, 63, and 71 of its implementing regulations.

1. NSPS Subpart JJJJ and Title V Permit Conditions

57. The stationary SI ICE, EU 1, operating at Johnson was manufactured in May 2008 and installed August 21, 2021. EU 1 is a non-certified Caterpillar G3516LE lean burn engine with 1,340 HP and is therefore subject to Subpart JJJJ according to 40 C.F.R. § 60.4230(a)(4)(ii).

58. An owner or operator of a non-certified SI ICE greater than 500 HP must conduct subsequent performance testing every 8,760 operating hours or 3 years, whichever comes first. 40 C.F.R. § 60.4243(b)(2)(ii).

59. Targa conducted a performance test on EU 1 on August 11, 2022 at 10,181 operating hours and conducted a subsequent performance test on December 20, 2023 at 24,909 operating hours.

60. Targa therefore operated EU 1 for an additional 14,728 hours before performing a

subsequent performance test on December 20, 2023.

61. Therefore, Targa exceeded the Subpart JJJJ requirement to perform a subsequent performance test on EU 1 by 5,968 operating hours, in violation of 40 C.F.R. § 60.4243(b)(2)(ii) and Johnson Title V Permit Condition II.D.2.

2. NSPS Subpart OOOO and Title V Permit Conditions

i. Failure to Conduct Performance Testing at Roberts Trust EU 36

62. The storage vessel, EU 11, operating at Roberts Trust was constructed on August 31, 2011, and is controlled by an enclosed combustion device, EU 36.

63. Roberts Trust EU 11 has total uncontrolled emissions greater than 6 tpy of VOCs and therefore is subject to Subpart OOOO according to 40 C.F.R. § 60.5365(e).

64. Roberts Trust EU 36 is a Tripoint Vapor Combustor, Serial Number: 82070, which was installed October 31, 2018, and has not been manufacturer tested as required under 40 C.F.R. § 60.5413(d).

65. Targa therefore is required to conduct performance tests on Roberts Trust EU 36 according to the schedule specified in 40 C.F.R. § 60.5413(b)(5).

66. Targa was required to conduct an initial performance test on Roberts Trust EU 36 within 180 days after initial startup. 40 C.F.R. § 60.5413(b)(5)(i).

67. Targa did not conduct an initial performance test on Roberts Trust EU 36 until November 15, 2023.

68. Therefore, Targa operated Roberts Trust EU 36 without the required initial performance test for 1,660 days in violation of 40 C.F.R. § 60.5413(b)(5) and Roberts Trust Title V Permit Condition III.G.1.

69. Targa also failed to operate Roberts Trust EU 36 in a manner consistent with good air pollution control practice in violation of 40 C.F.R. § 60.5370(b).

ii. Failure to Follow Operating and Repair Standards for Blue Buttes EU 16 and EU 22

a. EU 16 Closed-Vent System

70. The storage vessel, EU 16, operating at Blue Buttes was constructed on February

18, 2013, and is controlled by an enclosed combustion device, EU 22.

71. The Blue Buttes EU 16 storage vessel has total uncontrolled VOC emissions greater than 6 tpy and therefore is subject to Subpart OOOO according to 40 C.F.R. § 60.5365(e).

72. Storage vessels subject to Subpart OOOO must be designed to route all gases, vapors, and fumes emitted from the material in the storage vessel through a closed-vent system that meets the requirements of § 60.5411(c) to a control device that meets the requirements specified in 40 C.F.R. § 60.5412(c) and (d), or to a process. 40 C.F.R. §§ 60.5395(e)(1), 60.5411(c).

73. Targa was required to operate the closed-vent system with no detectable emissions. 40 C.F.R. § 60.5411(c)(2).

74. On June 15, 2023, EPA inspectors observed and recorded continuous emissions from the closed-vent system for Blue Buttes EU 16 when viewed with an optical gas imaging (OGI) camera.

75. Therefore, Targa violated and is continuing to violate 40 C.F.R. § 60.5411(c)(2) and Blue Buttes Title V Permit Condition III.E.2 by not operating the closed-vent system for Blue Buttes EU 16 with no detectable emissions.

b. <u>EU 16 Cover</u>

76. The cover and all openings on the cover (e.g., access hatches and pressure relief valves) for an affected storage vessel shall form a continuous impermeable barrier over the entire surface area of the liquid in the storage vessel. 40 C.F.R. § 60.5411(b)(1).

77. If an owner or operator discovers a leak in the cover for an affected storage vessel, a first attempt at repair must be made no later than 5 calendar days after the leak is detected and the repair must be completed no later than 30 days after the leak is detected. 40 C.F.R. § 60.5416(c)(4)(i)-(ii).

78. Targa reported in the Blue Buttes Title V Annual Compliance Certification submitted to the EPA on February 15, 2023, and subsequent follow-up emails that Blue Buttes EU 16 had been in intermittent compliance with the OOOO regulations.

79. An EPA inspector requested more information via email on March 8, 2023. In response, Targa disclosed that it had discovered a thief hatch on Blue Buttes EU 16 to be venting hydrocarbon emissions on October 25, 2022, and did not repair the thief hatch until January 6, 2023.

80. Therefore, Targa made no attempt at repair within 5 calendar days in violation of 40 C.F.R. §§ 60.5411(b)(1) and 60.5416(c)(4)(i), as well as Blue Buttes Title V Permit Condition III.I.1.

81. The repair also was not completed within 30 calendar days in violation of 40 C.F.R. §§ 60.5411(b)(1) and 60.5416(c)(4)(ii), as well as Title V Permit Condition III.I.1 at Blue Buttes.

c. EU 22 Operations

82. On June 15, 2023, EPA inspectors utilized an OGI to observe and record continuous hydrocarbon emissions being vented from Blue Buttes EU 22, with an OGI camera. EPA inspectors additionally observed through the site glass that none of the burners were lit on the approximately 10 burner array on the Tripoint ECD (Serial number: 82071). The temperature probe on the Tripoint screen noted the temperature inside the stack of the ECD was 117°F, well below typical combustion temperatures. The hydrocarbon emissions therefore were released to atmosphere without first being combusted.

83. Based upon the inspection findings, Targa failed to:

a. Operate Blue Buttes EU 22 in a manner consistent with good air pollution control practices for minimizing emissions in violation of 40 C.F.R. § 60.5370(b) and Blue Buttes Title V Permit Condition III.C.

b. Ensure that Blue Buttes EU 22 is maintained in a leak free condition in violation of 40 C.F.R. § 60.5412(d)(1)(i) and Blue Buttes Title V Permit Condition III.G.

c. Operate Blue Buttes EU 22 at all times when gases, vapors, and fumes are vented from storage vessel affected facilities through the closed vent system to the control device in violation of 40 C.F.R. § 60.5412(d)(3) and Blue Buttes Title V Permit Condition III.G.

iii. Failure to Follow Operating Standards for Clarks Creek EU 34

84. The storage vessels, EU 16 and EU 22, operating at Clarks Creek were installed between August 23, 2011, and before September 18, 2015, and are controlled by an enclosed combustion device, EU 34.

85. EU 16 and EU 22 at Clarks Creek each have uncontrolled emissions of VOCs greater than 6 tpy and, therefore, are subject to Subpart OOOO according to 40 C.F.R. § 60.5365(e).

86. On June 15, 2023, EPA inspectors utilized an OGI camera to observe and record continuous hydrocarbon emissions vented from Clarks Creek EU 34. EPA inspectors additionally observed through the site glass that only two burners were lit on the approximately 10 burner array on the Tripoint ECD (Serial number: 82067). The temperature probe on the Tripoint screen noted the temperature inside the stack of the ECD was 97°F, well below typical combustion temperatures. The hydrocarbon emissions therefore were released to the atmosphere without first being combusted.

87. Based on the inspection findings, Targa failed to:

    a. Operate Clarks Creek EU 34 in a manner consistent with good air pollution control practices for minimizing emissions in violation of 40 C.F.R. § 60.5370(b) and Clarks Creek Title V Permit Condition III.C.

    b. Ensure that Clarks Creek EU 34 is maintained in a leak free condition in violation of 40 C.F.R. § 60.5412(d)(1)(i) and Title V Permit Condition III.F.2 at Clarks Creek.

    c. Operate Clarks Creek EU 34 at all times when gases, vapors, and fumes are vented from storage vessel affected facilities through the closed vent system to the control device in violation of 40 C.F.R. § 60.5412(d)(3) and Clarks Creek Title V Permit Condition III.F.2.

iv. Failure to Follow Rod Packing Replacement Schedule for Clarks Creek EU 18

88. Targa installed a reciprocating compressor associated with compressor engine EU 18 at Clarks Creek on September 4, 2014, and therefore is subject to NSPS OOOO. 40 C.F.R. § 60.5365(c).

89. In accordance with Targa's NSPS OOOO report, dated January 12, 2022, Targa has elected to comply with the standards of 40 CFR 60.5385(a)(1) for Clarks Creek EU 18, which requires replacement of the rod packing before the total number of hours of operation reaches 26,000 hours. *See also* 40 C.F.R. 60.5415(c)(3).

90. Targa reported in the Clarks Creek 40 C.F.R. Part 60 Subpart OOOO Annual Report submitted to EPA on January 12, 2022, that it had operated the reciprocating compressor rod packing associated with Clarks Creek EU 18 for 29,810 hours without replacing the rod packing. This report covered the period beginning October 15, 2020, and ending October 14, 2021.

91. As stated in the Clarks Creek 40 C.F.R. Part 60 Subpart OOOO Annual Reports submitted to EPA on January 12, 2023, Targa did not replace the rod packing for Clarks Creek EU 18 until December 16, 2021.

92. Targa exceeded the limit to replace the rod packing for Clarks Creek EU 18 by at least 3,810 operating hours.

93. Therefore, Targa was not in continuous compliance with the rod packing requirements for Clarks Creek EU 18, in violation of 40 C.F.R. § 60.5385(a)(1) and 40 C.F.R. § 60.5415(c)(3).

3. NSPS Subpart OOOOa and Title V Permit Conditions

i. Failure to Follow Operating Requirements at Johnson EU 45

94. The Johnson Compressor Station includes three storage vessels, of which EU 9 and EU 47 were constructed on October 15, 2018, according to information provided by Targa in their October 15, 2019 Title V Application Modification. Because EU 9 and EU 47 were constructed after September 18, 2015, and have total uncontrolled

emissions of VOCs greater than 6 tpy, they are subject to NSPS OOOOa control requirements. 40 C.F.R. § 60.5365a(e).

95. Vapors from EU 9 and EU 47 are routed to Johnson EU 45 for combustion. According to the Johnson Title V Permit, EU 45 is a LEED Vapor Combustor, Model No. L30-0011-00,[2] installed on October 15, 2018.

96. On June 15, 2023, EPA inspectors observed with an OGI camera and recorded continuous hydrocarbon emissions vented from Johnson EU 45. EPA inspectors additionally observed through the site glass that none of the burners were lit on the approximately 10 burner array on the Tripoint ECD (Serial number: 82068). The temperature probe on the Tripoint screen noted the temperature inside the stack of the ECD was 73°F, well below typical combustion temperatures. The hydrocarbon emissions were released to atmosphere without first being combusted.

97. Based upon the inspection findings, Targa has failed to:

a. Operate Johnson EU 45 in a manner consistent with good air pollution control practices for minimizing emissions in violation of 40 C.F.R. § 60.5370a(b) and Johnson Title V Permit Condition III.B.

b. Ensure that the enclosed combustion device is maintained in a leak free condition in violation of 40 C.F.R. § 60.5412a(d)(1)(i) and Johnson Title V Permit Condition III.H.

c. Operate Johnson EU 45 at all times when gases, vapors, and fumes are vented from storage vessel affected facilities through the closed vent system to the control device in violation of 40 C.F.R. § 60.5412a(d)(4) and Johnson Title V Permit Condition III.H.

ii. <u>Failure to Timely Perform Repairs at Johnson EU 41</u>

98. An owner or operator of an affected facility must perform a first attempt at repair no later than 30 calendar days after detection of fugitive emissions and must

[2] At the June 15, 2023 inspection, the EPA inspector recorded that EU 45 is actually a Tripoint ECD, Serial Number 82068. Targa must update its Title V Permit to reflect current equipment and confirm the date of installation.

complete the repair as soon as practicable, but no later than 30 calendar days after the first attempt at repair. 40 C.F.R. § 60.5397a(h)(1)-(2).

99. EU 41 at Johnson is a Waukesha L5794GSI, 11.67 MMBtu/hr, 1,380 hp, 4SRB Natural Gas Compressor Engine installed on October 15, 2018, and the reciprocating compressor associated with EU 41 is an affected facility subject to OOOOa under 40 C.F.R. § 60.5365a(c).

100. Targa reported in the Johnson Title V Annual Compliance Certification submitted to EPA on January 31, 2023, that it had discovered a leak on the reciprocating compressor on EU 41 on October 25, 2022, and did not repair the leak until January 13, 2023.

101. As a result, Targa made no attempt at repair within 30 calendar days in violation of 40 C.F.R. § 60.5397a(h)(1), and Title V Permit Condition III.E.

102. Additionally, the repair was not completed within 30 calendar days in violation of 40 C.F.R. § 60.5397a(h)(2) and Johnson Title V Permit Condition III.E.

iii. Failure to Perform Timely Repairs at Blue Buttes EU 1

103. On March 23, 2020, Targa submitted a Title V revision application to the EPA which included a notification of modification to Blue Buttes EU 1 (a Caterpillar G3516LE 1,085 hp 4SLB Natural Gas Compressor Engine) after September 18, 2015, thus subjecting it to the requirements of OOOOa.

104. Targa reported in the Blue Buttes Title V Annual Compliance Certification submitted to the EPA on February 15, 2023, that Blue Buttes EU 1 had been in intermittent compliance with the requirements of OOOOa.

105. An EPA inspector requested more information via email on March 8, 2023. In response, Targa disclosed that it had discovered a flange connector on Blue Buttes EU 1 to be venting emissions on October 25, 2022, and did not repair the flange connector until January 13, 2023.

106. Therefore, Targa made no attempt at repair within 30 calendar days in violation of 40 C.F.R. § 60.5397a(h)(1), nor was the repair completed within 30 calendar days in violation of 40 C.F.R. § 60.5397a(h)(2) for Blue Buttes EU 1.

4. NESHAP Subpart HH and Title V Permit Conditions

i. Targa Failed to Properly Sample and Calculate the Optimum Glycol Circulation Rates for the TEG Dehydration Units at Junction and Roberts Trust.

107. The Facilities each operate at least one triethylene glycol (TEG) dehydration unit, each of which is an affected source subject to the requirements of Subpart HH. 40 C.F.R. § 63.760(b).

108. Each owner or operator of an area source not located in a UA plus offset and UC boundary shall:

a. Determine the optimum glycol circulation rate for each TEG dehydration unit using the equation specified at 40 C.F.R. § 63.764(d)(2)(i) or the alternate method specified at 40 C.F.R. § 63.764(d)(2)(ii).

b. Operate the TEG dehydration unit such that the actual glycol circulation rate does not exceed the optimum glycol circulation rate. 40 C.F.R. § 63.764(d)(2)(ii).

c. Maintain a record of the determination specified in paragraph (d)(2)(ii) in accordance with the requirements in § 63.774(f) and submit the Initial Notification in accordance with the requirements in § 63.775(c)(7). 40 C.F.R. § 63.764(d)(2)(iii).

109. As indicated in Targa's Title V Permits, for the TEG dehydration units operating at Junction (EU 21) and Roberts Trust (EU 17 and EU 26), Targa elected to calculate the optimum glycol circulation rate for each TEG dehydration unit using GRI–GLYCalc™, Version 3.0 or higher as specified in 40 C.F.R. § 63.764(d)(2)(ii).

110. ProMax is a simulation software used to determine emissions concentrations based on gas analysis taken up-steam of each dehydration unit. As approved by EPA, 88 Fed. Reg. 3408, 3409 (Jan. 19, 2023) (ALT-147), Targa uses ProMax Version 5.0 or higher in place of GLYCalc Version 3.0 or greater.

111. In an email to the EPA sent by Targa on December 12, 2023, Targa explained that it determined the optimum glycol circulation rate for Junction EU 21 by conducting ProMax calculations where the inputs for gas analysis were derived from a sample

taken from the discharge (post-compression and post-dehydration) of Roberts Trust on December 12, 2021.

112. To determine the optimum glycol circulation rate for Junction EU 21, Targa did not input into the ProMax model any gas analyses derived from samples taken from Junction EU 21.

113. Because Targa did not use gas analysis data derived from operations at Junction EU 21, Targa has not properly determined the optimum glycol circulation rate for Junction EU 21 according to the methodology specified at 40 C.F.R. § 63.764(d)(2)(ii) and therefore is in violation of that provision, as well as Junction Title V Permit Condition V.B.3.

114. Targa also used incorrect inputs for ProMax. To correctly determine the optimum glycol circulation rate using the method at 40 C.F.R. § 63.764(d)(2)(ii), the operator must pull a wet-gas sample from the inlet to the dehydrator. Targa failed to pull a wet-gas sample and instead pulled a dry-gas sample from the outlet of the dehydrator, which rendered the emissions concentrations and subsequent optimum glycol circulation rates incorrect according to 40 C.F.R. § 63.764(d)(2)(ii).

115. In sum, beginning December 12, 2021, Targa has violated and continues to violate 40 C.F.R. § 63.764(d)(2)(ii) because it did not properly calculate the optimum glycol circulation rate for the TEG dehydration units at Junction (Title V Permit Condition V.B.3) and Roberts Trust (Title V Permit Condition V.B.3).

ii. Targa Exceeded the Optimum Glycol Circulation Rate for the TEG Dehydration Units at Johnson and Junction.

116. The dehydration units at Johnson and Junction are each considered an area source not located in an urban area (UA) plus offset and urban cluster (UC) and therefore, Targa is required to determine the optimum glycol circulation rate according to 40 C.F.R. § 63.764(d)(2).

117. In a June 28, 2021, Subpart HH Notification to the EPA, Targa identified that it determined the optimum glycol circulation rate at Johnson EU 42 to be 1.22 gallons per minute.

118. During an onsite inspection at Johnson on June 15, 2023, EPA inspectors documented that Targa was using a glycol pump, model Kimray 21020PV. The inspector observed that the pump operated at approximately 12 strokes per minute. According to Kimray Product Bulletin PB0004 (May 2020), the Kimray 21020PV has an approximate stroke rate of 0.109 gallons per stroke. Therefore, 12 strokes per minute equates to roughly 1.308 gpm, which exceeds the optimum glycol circulate rate determined by Targa.

119. Targa therefore is in violation of 40 C.F.R. § 63.764(d)(2)(ii) and Title V Permit Condition IV.B.3 for failing to operate the TEG dehydration unit such that the actual glycol circulation rate does not exceed the optimum glycol circulation rate at Johnson EU 42.

120. On July 14, 2023, by email to the EPA, Targa provided a ProMax report stating that Targa determined the optimum glycol circulation rate at Junction EU 21 to be 0.45 gallons per minute.

121. During the onsite inspection on June 15, 2023, EPA inspectors documented that Targa was using a glycol pump, model Kimray 9020PV, at Junction. The inspector observed that the pump operated at approximately 14 strokes per minute. According to Kimray Product Bulletin PB0004 (May 2020), the Kimray 9020PV has an approximate stroke rate of 0.038 gallons per stroke. Therefore, 14 strokes per minute equates to roughly 0.532 gpm, which exceeds the optimum glycol circulation rate determined by Targa.

122. Targa has violated and continues to violate 40 C.F.R. § 63.764(d)(2)(ii) and Title V Permit Condition V.B.3 for failing to operate Junction EU 21 such that the actual glycol circulation rate does not exceed the optimum glycol circulation rate.

iii. Targa Failed to Follow the Proper Procedures to Claim an Exemption for the TEG Dehydration Units at Blue Buttes, TAT-Blue Buttes and Clarks Creek.

123. Pursuant to 40 C.F.R. § 63.764(e)(1)(ii), the owner or operator of an area source is exempt from the requirements of 40 C.F.R. §§ 63.764(d)(2) if records of the following determination are maintained: The actual average emissions of benzene from the

glycol dehydration unit process vent to the atmosphere are less than 0.90 megagram per year, as determined by the procedures specified in § 63.772(b)(2) of this subpart.

124. The determination of actual average benzene or BTEX emissions from a glycol dehydration unit shall be made using the procedures of either 40 C.F.R. § 63.772(b)(2)(i) or (ii). Emissions shall be determined either uncontrolled, or with federally enforceable controls in place. 40 C.F.R. § 63.772(b)(2).

125. If the owner or operator elects the procedures of 40 C.F.R. § 63.772(b)(2)(i), it shall determine actual average benzene or BTEX emissions using the model GRI–GLYCalcTM, Version 3.0 or higher, and the procedures presented in the associated GRI–GLYCalcTM Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI–95/0368.1).

126. In Title V applications submitted on March 23, 2023 for Blue Buttes (EU 7), December 6, 2018 for TAT-Blue Buttes (EU 15), and April 13, 2017 for Clarks Creek (EU 25), Targa asserted under 40 C.F.R. § 63.764(e)(1)(ii) that it was not required to calculate and operate at or below the optimum glycol circulation rate, as typically required by 40 C.F.R. § 63.764(d)(2).

127. To determine actual average benzene emissions for Blue Buttes EU 7, TAT-Blue Buttes EU 15 and Clarks Creek EU 25, Targa elected to use a model-based program as specified in 40 C.F.R. § 63.772(b)(2)(i).

128. According to information Targa provided via email to the EPA on December 12, 2023, Targa determined the actual average benzene and actual glycol circulation rate for Blue Buttes EU 7, TAT-Blue Buttes EU 15, and Clarks Creek EU 25 by conducting ProMax calculations utilizing inputs for the gas analysis derived from a sample taken at the discharge outlet (post-compression and post-dehydration) of Roberts Trust on December 12, 2021.

129. Targa did not use gas analysis data derived from operations at Blue Buttes EU 7, TAT-Blue Buttes EU 15 or Clarks Creek EU 25 to determine the actual average emissions of benzene or the actual glycol circulation rate for each of those affected TEG dehydration units.

130. Targa therefore failed to comply with the procedures specified in 40 C.F.R. § 63.764(e)(1)(ii) for claiming an exemption from the requirements of 40 C.F.R. § 63.764(d)(2) for Blue Buttes EU 7, TAT-Blue Buttes EU 15 and Clarks Creek EU 25.

131. Beginning December 12, 2021, Targa violated and is in violation of 40 C.F.R. § 63.764(e)(1)(ii), as well as Blue Buttes Title V Permit Condition IV.B.3, TAT-Blue Buttes Title V Permit Condition IV.B.3, and Clarks Creek Title V Permit Condition V.B.3 for its failure to follow the correct procedures for claiming an exemption for Blue Buttes EU 7, TAT-Blue Buttes EU 15, and Clarks Creek EU 25.

132. Additionally, according to information Targa provided via email to the EPA on December 12, 2023, Targa used incorrect inputs for ProMax by taking a dry-gas sample rather than the wet-gas sample required by 40 C.F.R. § 63.772(b)(2)(i).

133. Therefore, beginning December 12, 2021, Targa violated and is in violation of 40 C.F.R. § 63.772(b)(2)(i), as well as Blue Buttes Title V Permit Condition IV.B.3, TAT-Blue Buttes Title V Permit Condition IV.B.3, and Clarks Creek Title V Permit Condition V.B.3, for its failure to follow the correct procedures for claiming an exemption for Blue Buttes EU7, TAT-Blue Buttes EU 15, and Clarks Creek EU 25.

134. Targa also used inaccurate actual glycol circulation rates to claim the exemptions for TAT-Blue Buttes EU 15 and Clarks Creek EU 25.

135. In a GLYCalc report attached to the TAT-Blue Buttes Title V application submitted December 6, 2018, Targa determined the actual operating glycol circulation rate at TAT-Blue Buttes EU 15 to be 2.90 gallons per minute. In an email to the EPA dated July 14, 2023, Targa also provided a ProMax report stating the actual glycol circulation rate at TAT-Blue Buttes EU 15 to be 0.45 gallons per minute.

136. During the onsite inspection of TAT-Blue Buttes on June 15, 2023, EPA inspectors documented that Targa was using a glycol pump, model Kimray 21020PV. The

inspector observed that the pump operated at approximately 30 strokes per minute. According to Kimray Product Bulletin PB0004 (May 2020), the Kimray 21020PV has an approximate stroke rate of 0.109 gallons per stroke. Therefore, 30 strokes per minute equates to roughly 3.27 gpm, which is greater than the actual operating glycol circulation rate Targa used to invoke the exemption at 40 C.F.R. § 63.764(e)(1)(ii).

137. Therefore, Targa violated and continues to violate 40 C.F.R. §§ 63.764(d)(2), 63.764(e)(1)(ii), 63.772(b)(2) and Title V Permit Condition IV.B.3, for its failure to use actual operating conditions at TAT-Blue Buttes EU 15 to claim an exemption from the requirement to calculate and operate at or below the optimum glycol circulation rate at that unit.

138. In an email to the EPA dated July 14, 2023, Targa provided a ProMax report stating the actual glycol circulation rate at Clarks Creek to be 1.00 gallons per minute.

139. During the onsite inspection of Clarks Creek on June 15, 2023, EPA inspectors documented that Targa was using a glycol pump, model Kimray 21020PV. The inspector observed that the pump operated at approximately 12 strokes per minute. According to Kimray Product Bulletin PB0004 (May 2020), the Kimray 21020PV has an approximate stroke rate of 0.109 gallons per stroke. Therefore, 12 strokes per minute equates to roughly 1.308 gpm, which is greater than the actual operating glycol circulation rate Targa used to invoke the exemption at 40 C.F.R. § 63.764(e)(1)(ii).

140. Therefore, Targa violated and continues to violate 40 C.F.R. §§ 63.764(d)(2), 63.764(e)(1)(ii), 63.772(b)(2) and Clarks Creek Title V Permit Condition V.B.3 for failing to use actual operating conditions at Clarks Creek EU 25 to submit an appropriate exemption.

5. NESHAP Subpart ZZZZ and Title V Permit Conditions

i. Targa Failed to Timely Install CPMS at Johnson EU 1 and EU 41.

141. On October 15, 2019, Targa submitted a permit modification for Johnson indicating that it installed a variety of new equipment on October 15, 2018, including EU 23, EU 24, EU 37, EU 41, EU 42, EU 45, EU 46, and EU 52. Installation of this equipment increased Johnson's total PTE for HAP emissions to greater than 25 tpy. Johnson is therefore a "major source" of HAP emissions for purposes of Subpart ZZZZ as of October 15, 2018. 40 C.F.R. § 63.6585(b).

142. Stationary RICE subject to Subpart ZZZZ are required to comply with operating limitations at all times and must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times as specified in 40 C.F.R. § 63.6605(a) and (b).

143. An owner or operator of a stationary RICE greater than 500 HP subject to the Subpart ZZZZ requirement to limit the concentration of formaldehyde in the stationary RICE exhaust must install a continuous parameter monitoring system (CPMS), including temperature probes and pressure tubing across the catalyst. 40 C.F.R. § 63.6625(b); Table 5 to Subpart ZZZZ of Part 63 at 9.

144. Johnson EU 1 is a stationary RICE with a site rating of more than 500 brake HP that commenced construction on or after June 12, 2006, but before Johnson became a major source of HAP on October 15, 2018. Johnson EU 1 therefore had to comply with the requirements of Subpart ZZZZ by October 15, 2021. 40 C.F.R. §§ 63.6590(a)(2)(i), 63.6595(b)(2).

145. Targa elected to comply with the Subpart ZZZZ requirement to limit the concentration of formaldehyde from Johnson EU 1. Table 5 to Subpart ZZZZ of Part 63 at 9.

146. Targa reported in the Johnson Title V six-month monitoring report submitted to EPA on July 29, 2022, that it failed to install a CPMS, including temperature

probes and pressure tubing across the catalyst, at Johnson EU 1 until May 26, 2022.

147. Targa therefore was in violation of 40 C.F.R. §§ 63.6605(a) and (b), 63.6595(b)(2), 63.6625(b), and Johnson Title V Permit Conditions V.D. and V.G. at Johnson EU 1 for 223 days.

148. On October 15, 2018, Targa installed Johnson EU 41, a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions.

149. Johnson EU 41 therefore had to comply with the requirements of Subpart ZZZZ upon startup. 40 C.F.R. §§ 63.6590(a)(2)(i), 63.6595(a)(3).

150. Targa elected to comply with the Subpart ZZZZ requirement to limit the concentration of formaldehyde from Johnson EU 41. Table 5 to Subpart ZZZZ of Part 63 at 9.

151. Targa reported in the Johnson Title V six-month monitoring report submitted to EPA on July 29, 2022, that it failed to install a CPMS, including temperature probes and pressure tubing across the catalyst, at Johnson EU 41 until March 23, 2022.

152. Therefore, Targa was in violation of 40 C.F.R. §§ 63.6605(a) and (b), 63.6595(a)(3), 63.6625(b), and Johnson and Title V Permit Conditions V.D. and V.G. at Johnson EU 41 for 1,255 days.

ii. Targa Failed to Conduct Timely Performance Testing at Johnson EU 1.

153. An owner or operator of a stationary RICE greater than 500 HP subject to the requirement to limit the concentration of formaldehyde in the stationary RICE exhaust must conduct subsequent performance testing semiannually. After the owner or operator has demonstrated compliance for two consecutive tests, it may reduce the frequency of subsequent performance tests to annual. 40 C.F.R. § 63.6615(a) & Subpart ZZZZ Table 3 at 3 & n.1.

154. Before August 11, 2022, Targa conducted two consecutive tests at Johnson EU 1 that demonstrated compliance and therefore was required to conduct a subsequent performance test on an annual basis. Subpart ZZZZ Table 3 at 3 & n.1.

155. On August 11, 2022, Targa conducted a performance test at Johnson EU 1. At the time of the performance test, Johnson EU 1 had operated for 10,181 hours.

156. On December 20, 2023, Targa conducted a subsequent performance test at Johnson EU 1, when it had been operated for 24,909 hours.

157. Targa therefore conducted the subsequent performance test 14,728 operating hours after the previous test.

158. Targa therefore exceeded the requirement to conduct a subsequent performance test on Johnson EU 1 by 5,968 hours, in violation of 40 C.F.R. § 63.6615(a) and Johnson Title V Permit Condition V.H.2(a).

iii. Targa Failed to Continuously Comply with Operation, Monitoring, and Reporting Requirements.

159. Targa must meet the following operating requirements for new or reconstructed SI 4SRB stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions: maintain the catalyst so that the pressure drop across the catalyst does not change by more than 2 inches of water at 100 percent load plus or minus 10 percent from the pressure drop across the catalyst measured during the initial performance test; and maintain the temperature of each stationary RICE exhaust so that the catalyst inlet temperature is greater than or equal to 750°F and less than or equal to 1250°F. 40 C.F.R. § 63.6600(a) & Subpart ZZZZ Table 1b.

160. The following engines must meet the requirements of Subpart ZZZZ Table 1b specified in the previous paragraph:

a. Roberts Trust EU 27, EU 28, EU 29, EU 30, and EU 31

b. Johnson EU 41

161. For the engines listed in the previous paragraph, Targa is required to demonstrate continuous compliance with the requirements of Subpart ZZZZ Table 1b. To demonstrate continuous compliance, Targa must maintain the 4-hour rolling averages within the operating limitations for the catalyst inlet temperature; measure the pressure drop across the catalyst once per month; and demonstrate that the pressure drop across the catalyst is within the operating limitation

established during the performance test. 40 C.F.R. § 63.6640(a) & Subpart ZZZZ Table 6.

162. Targa reported that catalyst measurements were not taken during the months as shown in Table 1 below:

Table 1: Missed Catalyst Measurements

Engine Emission Unit ID	Facility	Month and Year Missed Checks
EU 27	Roberts Trust	September 2020, December 2020, April 2021, June 2022, March 2023
EU 28	Roberts Trust	July 2020, September 2020, December 2020April 2021, June 2022, March 2023
EU 29	Roberts Trust	February 2020, September 2020, December 2020, April 2021, June 2022, March 2023
EU 30	Roberts Trust	July 2020, September 2020, December 2020, April 2021, June 2022, March 2023
EU 31	Roberts Trust	September 2020, December 2020, April 2021, June 2022, March 2023
EU 41	Johnson	October 2021, November 2021, December 2021, January 2022, February 2022, March 2022, March 2023

163. As shown in Table 1 above, Targa failed to record monthly catalyst pressures and therefore violated 40 C.F.R. § 63.6600(a):

a. No fewer than 28 times since January 1, 2020, at Roberts Trust EU 27, EU 28, EU 29, EU 30 and EU 31. These also constitute 28 separate violations of Roberts Trust Title V Permit Condition VI.D.2(b).

b. No fewer than seven times since October 15, 2021, at Johnson EU 41. These also constitute seven separate violations of Johnson Permit Condition V.F.2(b).

164. Targa reported that the following existing, new or reconstructed SI 4SRB stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions did not maintain catalyst inlet temperatures at greater than or equal to 750°F and less than or equal to 1250°F as shown in Table 2 below:

Table 2: Percent of Operating Hours Catalyst Inlet Temperatures Outside of Table 1b of Subpart ZZZZ since January 1, 2020

Engine Emission Unit ID	Facility	Percent Operating Hours Outside of Requirements
EU 27	Roberts Trust	**3.4%**
EU 28	Roberts Trust	**10.3%**
EU 29	Roberts Trust	**5.1%**
EU 30	Roberts Trust	**4.3%**
EU 31	Roberts Trust	**4.7%**
EU 41*	Johnson	**2.7%***

* EU 41 operating at Johnson Percent Operating Hours Outside Requirements shown in Table 1b of Subpart ZZZZ does not include the 159 days that the temperature probes were not installed.

165. As shown in Table 2 above, since January 1, 2020, Targa failed to continuously maintain catalyst inlet temperatures at greater than or equal to 750°F and less than or equal to 1250°F in violation of 40 C.F.R. § 63.6600(a) at:

a. Roberts Trust EU 27, EU 28, EU 29, EU 30 and EU 31. These also constitute five separate violations of Roberts Trust Title V Permit Condition VI.D.2(b).

b. Johnson EU 41. This also constitutes one violation of Johnson Title V Permit Condition V.F.2(b).

166. Targa must meet the following operating requirements for existing, new or reconstructed SI 4SLB stationary RICE with a site rating of more than 250 brake HP located at a major source of HAP emissions: maintain the catalyst so that the pressure drop across the catalyst does not change by more than 2 inches of water at 100 percent load plus or minus 10 percent from the pressure drop across the catalyst measured during the initial performance test; and maintain the temperature of each stationary RICE exhaust so that the catalyst inlet temperature is greater than or equal to 450 °F and less than or equal to 1350°F. 40 C.F.R. § 63.6600(b) & Subpart ZZZZ Table 2b.

167. The following engines are required to meet the requirements of Subpart ZZZZ Table 2b specified in the previous paragraph:

a. Roberts Trust EU 15

b. Junction EU 1, EU 2 and EU 18

c. Johnson EU 1

d. Blue Buttes EU 1, EU 2 and EU 18

168. For the engines listed immediately above, Targa is required to demonstrate continuous compliance with the requirements of Subpart ZZZZ Table 1b. To demonstrate continuous compliance, Targa must maintain the 4-hour rolling averages within the operating limitations for the catalyst inlet temperature; measure the pressure drop across the catalyst once per month; and demonstrate that the pressure drop across the catalyst is within the operating limitation established during the performance test. 40 C.F.R. § 63.6640(a) & Subpart ZZZZ Table 6.

169. Targa reported catalyst measurements were not taken during the months shown in Table 3 below:

Table 3: Missed Catalyst Measurements

Engine Emission Unit ID	Facility	Month and Year Missed Checks
EU 15	Roberts Trust	March 2023
EU 1	Johnson	October 2021, November 2021, December 2021, January 2022, February 2022, March 2022, March 2023
EU 1	Blue Buttes	June 2020, September 2020, January 2021, June 2021
EU 2	Blue Buttes	June 2020, September 2020, January 2021, June 2021
EU 18	Blue Buttes	June 2020, September 2020, January 2021, June 2021

170. As shown in Table 3 above, Targa failed to record monthly catalyst pressures measurements in violation of 40 C.F.R. § 63.6600(a):

a. One time since January 1, 2020, for Roberts Trust EU 15. This also constituted one violation of Roberts Trust Title V Permit Condition VI.J.2.

b. Seven times since October 15, 2021, for Johnson EU 1. These also constitute seven violations of Johnson Title V Permit Condition V.K.2.

c. 12 times since January 1, 2020, at Blue Buttes EU 1, EU 2 and EU 18.

171. Targa reported that the following existing, new or reconstructed SI 4SLB stationary RICE with a site rating of more than 250 brake HP located at a major source of HAP emissions did not maintain catalyst inlet temperatures at greater than or equal to 450°F and less than or equal to 1350°F shown in Table 4 below:

Table 4: Percent of Operating Hours Catalyst Inlet Temperatures Outside of Table 2b of Subpart ZZZZ since January 1, 2020

Engine Emission Unit ID	Facility	Percent Operating Hours Outside of Requirements
EU 15	Roberts Trust	**41.2%**
EU 1*	Johnson	**2.7%***
EU 1	Blue Buttes	**11.4%**
EU 2	Blue Buttes	**17.5%**
EU 18	Blue Buttes	**12.2%**

* EU 1 operating at Johnson Percent Operating Hours Outside Requirements shown in Table 2b of Subpart ZZZZ does not include the 223 days that the temperature probes were not installed.

172. As shown in Table 4 above, since January 1, 2020, Targa failed to maintain catalyst inlet temperatures at greater than or equal to 450°F and less than or equal to 1350°F in violation of 40 C.F.R. § 63.6600(a) at:

a. Roberts Trust EU 15. This also constitutes one violation of Roberts Trust Title V Permit Condition VI.J.2.

b. Johnson EU 1. This also constitutes one violation of Johnson Title V Permit Condition V.K.2.

c. Blue Buttes EU 1, EU 2 and EU 18.

173. Roberts Trust EU 15, EU 27, EU 28, EU 29, EU 30 and EU 31 are stationary RICE of greater than 500 HP at a major source of HAP emissions for which Targa elected to comply with the requirement to limit the concentration of formaldehyde in the stationary RICE exhaust. Targa therefore must conduct subsequent performance tests at each of these units according to Subpart ZZZZ, Table 3. 40 C.F.R. § 63.6615 & Subpart ZZZZ Table 3 at 3.

174. Targa did not conduct subsequent performance tests at Roberts Trust EU 15, EU 27, EU 28, EU 29, EU 30 and EU 31 in calendar year 2021, 2022 and 2023. This constitutes 18 separate violations of 40 C.F.R. § 63.6615 and Roberts Trust Title V Permit Condition VI.G.2.

175. Roberts Trust, Junction, Johnson and Blue Buttes each are major sources of HAP emissions. Therefore, at those locations, Targa must install, operate, and maintain a CPMS for each stationary RICE greater than 500 HP complying with the Subpart ZZZZ requirement to limit the concentration of formaldehyde in the stationary RICE exhaust. 40 C.F.R. § 63.6625(b) & Table 5 at 9.

176. For the following stationary RICE, Targa has not operated and maintained the required CPMS in violation of 40 C.F.R. § 63.6625(b). Specifically, for the following stationary RICE, Targa has not prepared any of the documents or performed any of the requirements listed in 40 C.F.R. § 63.6625(b)(1)-(6):

    a. Roberts Trust EU 15, EU 27, EU 28, EU 29, EU 30 and EU 31. This also constitutes six separate violations of Roberts Trust Title V Permit Condition VI.H.1.

    b. Junction EU 1, EU 2 and EU 18. This also constitutes three separate violations of Junction Permit Condition VI.G.

    c. Johnson EU 1 and EU 41. This also constitutes two separate violations of Johnson Permit Condition V.I.

    d. Blue Buttes EU 1, EU 2 and EU 18.

177. Except for monitor malfunctions, associated repairs, required performance evaluations, and required quality assurance or control activities, Targa must continuously monitor using a CPMS at all times that an affected stationary RICE is operating.

178. For the following affected stationary RICE, Targa has not monitored continuously using a CPMS in violation of 40 C.F.R. § 63.6635(b):

    a. Roberts Trust EU 15, EU 27, EU 28, EU 29, EU 30 and EU 31. This also constitutes six separate violations of Roberts Trust Title V Permit Condition VI.J.1.

b. Junction EU 1, EU 2 and EU 18. This also constitutes three separate violations of Junction Title V Permit Condition VI.I.

c. Johnson EU 1 and EU 41. This also constitutes two separate violations of Johnson Title V Permit Condition V.K.1.

d. Blue Buttes EU 1, EU 2 and EU 18.

179. Targa is required to submit reports for new or reconstructed stationary RICE greater than 500 HP located at a major source of HAP. 40 C.F.R. § 63.6650 and Subpart ZZZZ Table 7 at 1.

180. The following stationary RICE are required to meet those reporting requirements, but since January 1, 2021, Targa has failed to submit reports or submitted incomplete reports in violation of 40 C.F.R. § 63.6650:

a. Roberts Trust EU 15, EU 27, EU 28, EU 29, EU 30, and EU 31

b. Junction EU 1, EU 2, EU 18

c. Johnson EU 1, EU 41

d. Blue Buttes EU 1, EU 2 and EU 18

181. In addition to violating 40 C.F.R. § 63.6650, Targa's failure to submit complete reports also constitutes six violations of Roberts Trust Title V Permit Condition VI.K.2, three violations of Junction Title V Permit Condition VI.J, and four violations of Johnson Title V Permit Condition V.L.2.

III. ENFORCEMENT AUTHORITY

182. Section 113(a)(3) of the Act, 42 U.S.C. § 7413(a)(3), provides the Administrator with the authority that whenever, on the basis of any information available to the Administrator, the Administrator finds that any person has violated, or is in violation of, any requirement of prohibition of the Act other than State Implementation Plans, including New Source Performance Standards, the Administrator may issue an order requiring such person to comply with the requirements or prohibition of the Act, issue an administrative penalty order in accordance with section 113(d) of the Act, or bring a civil action in accordance with section 113(b) of the Act for injunctive relief or civil penalties.

183. The issuance of this NOV does not in any way limit or preclude the EPA from pursuing additional enforcement options concerning inspections referenced in this NOV. Also, this NOV does not preclude enforcement action for violations not specifically addressed in this NOV.

Date Issued: _____

SUZANNE BOHAN

Digitally signed by SUZANNE BOHAN
Date: 2024.04.03 14:42:58 -06'00'

_____

Suzanne J. Bohan, Director
Enforcement and Compliance Assurance Division
Environmental Protection Agency, Region 8

Appendix A

Clarks Creek Emission Points

Emissions Unit ID	Description
EU 1	Caterpillar G3516TALE, 8.23 MMBtu/hr*, 1085 hp*, 4SLB* Natural Gas Compressor Engine: Serial Number: WPT00132 Installed: 7/26/2012 Manufactured Prior to 7/1/2008
EU 2	Waukesha F3514GSI, 5.94 MMBtu/hr*, 740 hp, 4SRB* Natural Gas Compressor Engine: Serial Number: C-15720/1 Installed: 7/26/2012 Manufactured Prior to 7/1/2008
EU 5	One 0.5 MMBtu/hr Tank Heater
EU 7	10 Pneumatic Pumps
EU 8	One 2000-gallon Methanol Storage Tank
EU 9 EU 23	Two 400 bbl* Produced Water Tanks
EU 10	Produced Water Loadout
EU 12	Building Heaters
EU 13	Low and Intermittent Bleed Pneumatic Devices
EU 14	Nine PIG Launchers/Receivers: six 8-inch, three 10-inch
EU 15	Fugitive Emissions
EU 16 EU 22	Two 400 bbl* Condensate Tanks
EU 17	Condensate Loading
EU 18	Caterpillar G3516LE, 9.92 MMBtu/hr*, 1340 hp*, 4SLB* Natural Gas Compressor Engine: Serial Number: WPW02848 Installed: 9/4/2014 Manufactured After to 7/1/2008
EU 21	One 500-gallon Methanol Storage Tank
EU 25 EU 26	One 22MMscfd* Dehydrator Process Vent One 0.682 MMBtu/hr* Glycol Reboiler
EU 27 EU 28 EU 29 EU 30	Four 500-gallon Lube Oil Tanks
EU 31	One 500-gallon Antifreeze Tank
EU 32	One 500-gallon TEG Tank

Emissions Unit ID	Description
EU 33	Waukesha L5794GSI, 10.55MMBtu/hr*,1380 hp*, 4SLB Natural Gas Compressor Engine: Serial Number: 5283704413 Installed: 7/28/2018 Manufactured After to 7/1/2008
EU 34	One Vapor Combustor

Johnson Emission Points

Emissions Unit ID	Description
EU 1	Caterpillar G3516LE, 10.12 MMBtu/hr*, 1340 hp*, 4SLB* Natural Gas Compressor Engine: Serial Number: WPW02218 Installed: 8/21/2011 Manufactured: 5/1/2008 Ariel JGK/4 Reciprocating Compressor Serial Number: F- 27023
EU 4	Tank Heater, 0.5 MMBtu/hr
EU 6 EU 24	Fugitive Emissions from valves, pump seals, connectors, flanges.
EU 7	400 bbl Produced Water Tank
EU 8	1,000 gal Methanol Storage Tank
EU 9	400 bbl* Condensate Storage Tank
EU 11	Condensate Loading
EU 14	Pneumatic Pumps
EU 15	500 gal Coolant Tank
EU 16	500 gal Coolant Tank
EU 17	500 gal Lube Oil Tank
EU 18	500 gal Lube Oil Tank
EU 19	500 gal TEG Tank
EU 21	400 bbl Produced Water Tank
EU 23	PIG Launchers and Receivers
EU 26 EU 27	Two 2,000 gal Methanol Storage Tanks
EU 41	Waukesha L5794GSI, 11.67 MMBtu/hr, 1,380 hp, 4SRB Natural Gas Compressor Engine: Serial Number: 5283705655 Installed: 10/15/2018 Manufactured: 4/1/2018

Emissions Unit ID	Description
	Ariel JGK/4 Reciprocating Compressor Serial Number: F- 56112
EU 42 EU 44	TEG Dehydration Unit, 12.0 Mscf, emissions from dehydrator process vents: Installed: 10/15/2018 Heater for Glycol Reboiler on EU 42, 0.375 MMBtu/hr
EU 45	LEED Vapor Combustor, enclosed combustor: Model No. L30-0011-00 Installed: 10/15/2018
EU 10 EU 11 EU 22 EU 46	Miscellaneous Loading Losses
EU 47	400 bbl Condensate Tank
EU 52	Doosan 11.1L 1800 Turbo D111TIC, 4.20 MMBtu/hr, 268 hp, 4SRB Natural Gas Powered Generator for facility electric power generation: Serial Number: EEIOH404205 Installed: 10/17/2020 Manufactured: 10/7/2014

Junction Emission Points

Emissions Unit ID	Description
EU 1	Caterpillar G3516LE, 8.08 MMBtu/hr*, 1,085 hp*, 4SLB* Natural Gas Compressor Engine: Serial Number: WPT00206 Installed: 4/6/2013 Manufactured: 9/1/2006
EU 2	Caterpillar G3512LE, 6.46 MMBtu/hr*, 860 hp*, 4SLB* Natural Gas Compressor Engine: Serial Number: WPP00129 Installed: 4/6/2013 Manufactured: 9/1/2006
EU 7 EU 4	12 MMscfd* TEG Dehydrator- Process Vent Installed: 4/6/2013 TEG Reboiler, 0.20 MMBtu/hr*
EU 5	Tank Heater, 0.50 MMBtu/hr*
EU 6	Building Heaters
EU 8	8 Pneumatic Methanol Injection Pumps

Emissions Unit ID	Description
EU 9	19 Pneumatic Devices (Intermittent Bleed and Low Bleed)
EU 10	One 2,000 gallon Methanol Storage Tank
EU 11	One 400 bbl* Produced Water Storage Tank Installed: 4/6/2013
EU 12	Water Loading Losses
EU 13	Two 12" Pig Receivers
EU 14	One 6" Pig Launcher
EU 15	Fugitive Emissions
EU 16	One 400 bbl* Condensate Storage Tank Installed: 4/6/2013
EU 17	Condensate Loading Losses
EU 18	Waukesha L5774LT, 10.69 MMBtu/hr*, 1,280 hp*, 4SLB* Natural Gas Compressor Engine: Serial Number: C-16315/1 Installed: 5/18/2014 Manufactured: 1/1/2006
EU 19	Caterpillar G3512LE, 8.36 MMBtu/hr*, 1,004 hp*, 4SLB* Natural Gas Compressor Engine: Serial Number: JNJ00772 Installed: 10/23/2014 Manufactured: 4/1/2001
EU 21 EU 20	8 MMscfd* TEG Dehydrator- Process Vent Installed: 4/6/2013 Glycol Reboiler, 0.25 MMBtu/hr*
EU 22	One 400 bbl* Condensate Storage Tank Installed: 4/6/2013
EU 23	One 400 bbl* Produced Water Storage Tank Installed: 4/6/2013
EU 25	NG Engines PSI HD 8.1L Turbo, 2.31 MMBtu/hr*, 199 hp*, 4SRB*, Natural Gas Powered Generator Engine: Serial Number: EEPOG402088 Manufactured After 10/6/2014
EU 27	LEED 60" Vapor Combustor Model Number: EC60-2S Installed: 2018

Blue Buttes Emission Points

Emissions Unit ID	Description (acronyms defined below table)
EU 1	Caterpillar G3516LE, 10.12 MMBtu/hr, 1,085 hp, 4SLB Natural Gas Compressor Engine: Serial Number: WPT00232 Installed: 2/18/2013 Manufactured: 1/2/07
EU 2	Caterpillar G3512LE, 10.12 MMBtu/hr, 860 hp, 4SLB Natural Gas Compressor Engine: Serial Number: WPP00138 Installed: 2/18/2013 Manufactured: 9/15/06
EU 5	0.5 MMBtu/hr Tank Heater
EU 7 EU 4	15 MMscfd TEG Dehydrator Installed: 2/18/2013 0.5 MMBtu/hr TEG Reboiler
EU 8	Pneumatic methanol injection pumps Installed: 2/18/2013
EU 9	Pneumatic devices Installed: 2/18/2013
EU 10	One - 505 gallon Methanol Storage Tank
EU 11	One - 1,050 gallon Methanol Storage Tank
EU 12	One - 400 bbl Produced Water Storage Tank
EU 13	Produced Water Loading
EU 14	Pig Receiver
EU 15	Fugitive Emissions (Valves, pumps, seals, flanges)
EU 16	One 400 bbl Condensate Storage Tank Installed: 2/18/2013
EU 17	Condensate Loading Installed: 2/18/2013
EU 18	Waukesha L5774LT, 10.69 MMBtu/hr, 1,280 hp, 4SLB Natural Gas Compressor Engine: Serial number: C-16314/1 Installed: 6/25/14 Manufactured: 1/5/06 Ariel JGK/4 Reciprocating Compressor Serial Number: F-23762
EU 22	Vapor Combustor Installed: 3/23/2015
EU 23	Cummins KTA19GC; 3.26 MMBtu/hr, 380 hp, 4SRB Natural Gas-Powered Generator for facility electric power generation Serial number: M141383783

Emissions Unit ID	Description (acronyms defined below table)
	Installed: 5/25/2015
EU 24	Cummins KTA19GC; 3.26 MMBtu/hr, 380 hp, 4SRB Natural Gas-Powered Generator for facility electric power generation Serial number: M141383782 Installed: 5/25/2015
EU 25	NG Engines PSI HD 8.1L T, 2.32 MMBtu/hr, 199 hp, 4SRB Natural Gas-Powered Generator for facility electric power generation: Serial Number: EEPOG200813 Installed: 5/19/16

TAT- Blue Buttes Emission Points

Emission Unit ID	Description (acronyms defined below table)
EU 1 EU 2 EU 3 EU 4 EU 5 EU 6 EU 29	Seven - Waukesha L5794GSI, 11.67 MMBtu/hr, 1,380 hp, 4SRB Natural Gas Compressor Engines: Serial Number: 5283705154, Ariel JGK/4 Reciprocating Compressor Serial Number: 5283704435, Ariel JGK/4 Reciprocating Compressor Serial Number: 5283704438, Ariel JGK/4 Reciprocating Compressor Serial Number: 5283704419, Ariel JGK/4 Reciprocating Compressor Serial Number: 5283705185, Ariel JGK/4 Reciprocating Compressor Serial Number: 3193206, Ariel JGK/4 Reciprocating Compressor Serial Number: 3193208 Ariel JGK/4 Reciprocating Compressor All Engines Installed After 12/06/17 All Engines Manufactured After January 2015
EU 7 EU 30	Two 400 bbl Produced Water Fixed Roof Storage Tanks
EU 8	Produced Water Loading Losses
EU 9	PIG Launchers/Receivers
EU 10	Fugitive Emissions: Valves, Pump, Seals, Connectors, Flanges, etc. Installed: 12/06/2017
EU 11 EU 12	Four - 400 bbl Condensate Fixed Roof Storage Tanks Installed: 12/06/2017

Emission Unit ID	Description (acronyms defined below table)
EU 31 EU 32	
EU 13	Condensate Loading Losses Installed: 12/06/2017
EU 14	48" LEED Vapor Combustor Model No. L30-0011-00 Installed: 12/06/2017
EU 15 EU 16	42 MMscfd TEG Dehydrator Installed: 12/06/2017 0.675 MMbtu/hr Glycol Reboiler
EU 17	Methanol Storage Tank – 2,000 gal
EU 18 EU 19 EU 20 EU 21 EU 22 EU 23 EU 33	Seven - 500 gal Lube Oil Tanks
EU 24 EU 25 EU 34	Three - 500 gal Antifreeze Tanks
EU 26	TEG Tank - 500gal
EU 27 EU 28	Two - Doosan/PSI FPIB21.9NGP, 3.91 MMBtu/hr, 507 hp, 4SRB Natural Gas Compressor Engines: Serial Number: EEYOF501156 Serial Number: EEYOF01238 All Engines Installed: 12/06/17 All Engines Manufactured After June 2015

Roberts Trust Emission Points

Emission Unit ID	Description (acronyms defined below table)
EU 1 EU 2 EU 3 EU 4 EU 5 EU 6 EU 29	Seven - Waukesha L5794GSI, 11.67 MMBtu/hr, 1,380 hp, 4SRB Natural Gas Compressor Engines: Serial Number: 5283705154, Ariel JGK/4 Reciprocating Compressor Serial Number: 5283704435, Ariel JGK/4 Reciprocating Compressor Serial Number: 5283704438, Ariel JGK/4 Reciprocating Compressor Serial Number: 5283704419, Ariel JGK/4 Reciprocating Compressor

Emission Unit ID	Description (acronyms defined below table)
	Serial Number: 5283705185, Ariel JGK/4 Reciprocating Compressor Serial Number: 3193206, Ariel JGK/4 Reciprocating Compressor Serial Number: 3193208 Ariel JGK/4 Reciprocating Compressor All Engines Installed After 12/06/17 All Engines Manufactured After January 2015
EU 7 EU 30	Two 400 bbl Produced Water Fixed Roof Storage Tanks
EU 8	Produced Water Loading Losses
EU 9	PIG Launchers/Receivers
EU 10	Fugitive Emissions: Valves, Pump, Seals, Connectors, Flanges, etc. Installed: 12/06/2017
EU 11 EU 12 EU 31 EU 32	Four - 400 bbl Condensate Fixed Roof Storage Tanks Installed: 12/06/2017
EU 13	Condensate Loading Losses Installed: 12/06/2017
EU 14	48" LEED Vapor Combustor Model No. L30-0011-00 Installed: 12/06/2017
EU 15 EU 16	42 MMscfd TEG Dehydrator Installed: 12/06/2017 0.675 MMbtu/hr Glycol Reboiler
EU 17	Methanol Storage Tank – 2,000 gal
EU 18 EU 19 EU 20 EU 21 EU 22 EU 23 EU 33	Seven - 500 gal Lube Oil Tanks
EU 24 EU 25 EU 34	Three - 500 gal Antifreeze Tanks
EU 26	TEG Tank - 500gal
EU 27 EU 28	Two - Doosan/PSI FPIB21.9NGP, 3.91 MMBtu/hr, 507 hp, 4SRB Natural Gas Compressor Engines: Serial Number: EEYOF501156

Emission Unit ID	Description (acronyms defined below table)
	Serial Number: EEYOF01238 All Engines Installed: 12/06/17 All Engines Manufactured After June 2015