



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 6  
1201 ELM STREET, SUITE 500  
DALLAS, TEXAS 75270-2102**

September 24, 2020

VIA EMAIL: [bgrantham@targaresources.com](mailto:bgrantham@targaresources.com)

Mr. Bill Grantham  
Targa Midstream Services, LLC – Venice Gas Processing Plant  
811 Louisiana Street, Suite 2100  
Houston, Texas 77002

RE: Emission Inventory Permit Consistency Review  
Targa Midstream Services, LLC – Venice Gas Processing Plant (AI# 17897)

Dear Mr. Grantham:

The U.S. Environmental Protection Agency (EPA) Region 6 is working with the Louisiana Department of Environmental Quality (LDEQ) and has reviewed your facility's 2018 emission inventory for criteria pollutant and hazardous air pollutant (HAP) emission totals, as reported to LDEQ. Based upon this review, EPA has determined that your reported emissions for some Emission Points exceeded your permit authorization limits. EPA had also reviewed your Title V reports for 2018 and did not find that these permit exceedances were reported.

A detail by Emission Point of the differences between the reported emissions and permitted limits is included in the attachment to this letter. EPA is providing you the opportunity to clarify or explain these differences, especially if any of the following conditions are present:

- Sources and associated emissions included in the emission inventories that are not represented in permits (e.g. de minimis sources);
- Criteria pollutants or individual HAPs reported in the facility's emission inventories that are not represented in LDEQ permits or authorizations;
- Reported or unreported upset or other excess emission events (e.g. startup/shutdown).

If Targa Midstream Services, LLC (Targa). is interested in discussing or providing information about this matter, you have ten (10) working days from receipt of this letter to inform EPA by e-mail by contacting:

Jack Telleck  
Enforcement Officer (ECDAT)  
Air Toxics Enforcement Section  
U.S. EPA, Region 6  
email: [telleck.jack@epa.gov](mailto:telleck.jack@epa.gov)

Subsequent to the above-referenced due date, Jack Telleck will arrange to meet with Targa via conference call. At that time, Targa may provide additional information to address the potential violations and present evidence that contravenes EPA's evidence.

The primary goal is to ensure compliance with the applicable environmental laws and regulations; however, settlements will be available where appropriate.

Please direct questions to Jack Telleck of the Air Enforcement Branch at 214-665-9732 or at [telleck.jack@epa.gov](mailto:telleck.jack@epa.gov). Thank you for your attention to this matter.

The EPA acknowledges that the COVID-19 pandemic may impact your business. If that is the case, please contact us regarding any specific issues you need to discuss.

Sincerely,

STEVEN  
THOMPSON

Steve Thompson  
Chief  
Air Enforcement Branch

Digitally signed by STEVEN THOMPSON  
DN: c=US, o=U.S. Government, ou=Environmental  
Protection Agency, cn=STEVEN THOMPSON,  
0.9.2342.19200300.100.1.1=68001003652657  
Date: 2020.09.24 13:34:56 -05'00'

Attachment

ECC: Celena Cage, Louisiana Department of Environmental Quality, [celena.cage@la.gov](mailto:celena.cage@la.gov)

**Attachment A****Targa Midstream Services LLC - Venice Gas Processing Plant**

| AI #  | Facility Name               | Permit        | Subject Item   | Subject Item Type | Subject Item Desc | Emission Type | Parameter Desc  | Permitted Limit (tpy) | ERIC Reported Emissions (tpy) | Reported Emissions Over Permitted Limit (tpy) |
|-------|-----------------------------|---------------|----------------|-------------------|-------------------|---------------|-----------------|-----------------------|-------------------------------|-----------------------------------------------|
| 17897 | VENICE GAS PROCESSING PLANT | 2240-00015-V7 | EQT00000000009 | Flare             | Process Flare     | Routine       | Carbon monoxide | 2.91                  | 10.29                         | 7.38                                          |
| 17897 | VENICE GAS PROCESSING PLANT | 2240-00015-V7 | EQT00000000009 | Flare             | Process Flare     | Routine       | Nitrogen oxides | 0.64                  | 4.961                         | 4.32                                          |