

Operated by Targa Badlands, LLC –Clarks Creek Compressor Station
Full Compliance Evaluation (FCE)
On-Site Inspection

Inspection Date: June 15, 2023

Inspection Report Date: August 1, 2023

EPA Representatives: [REDACTED], Environmental Scientist, US EPA Region 8
[REDACTED] Environmental Scientist, US EPA Region 8
[REDACTED] Environmental Scientist, US EPA Region 8
[REDACTED] EPA Inspector, US EPA NEIC
[REDACTED] US EPA Region 6

Tribal Representatives: [REDACTED]

Company Representatives: [REDACTED]
[REDACTED]

Inspection Report Prepared By: [REDACTED], Environmental Scientist, US EPA Region 8

Inspection Report Reviewed By: [REDACTED] Manager, Enforcement and Compliance Assurance
Division, Air and Toxics Enforcement Branch

Last Inspection: August 18, 2020

Operating Status: Operating

Applicable Requirements: 40 CFR Part 60, Subpart JJJJ: Standards of Performance for New
Stationary Spark Ignition Internal Combustion Engines (NSPS
JJJJ)
40 CFR Part 60, Subpart OOOO 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 (NSPS OOOO)
40 CFR Part 60, Subpart OOOOa Standards of Performance for
Crude Oil and Natural Gas Facilities for which Construction,
Modification or Reconstruction Commenced After September 18,
2015 (NSPS OOOOa)
40 CFR Part 63, Subpart HH) National Emission Standards for
Hazardous Air Pollutants from Oil and Natural Gas Production
Facilities (MACT HH)
40 CFR Part 63, Subpart ZZZZ: National Emissions Standards for
Hazardous Air Pollutants for Stationary Reciprocating Internal
Combustion Engines (MACT ZZZZ)

Permit Number: V-TAT-000671-2013.00
Replaces Permit No.: NA

Issue Date: October 3, 2019
Effective Date: November 4, 2019
Expiration Date: November 4, 2024

Facility Information and Emission Unit Identification

Parent Company Name: Targa Badlands, LLC (Targa)
Mailing Address: 1939 125th Avenue NW, Watford City, North Dakota 58854
Facility Contact: [REDACTED], Senior Environmental Specialist
[REDACTED]
Facility Operator & Name: Targa – Clarks Creek Compressor Station (Clarks Creek)
Facility Location: Latitude 47.9079, Longitude -102.7582
County, State: McKenzie County, North Dakota
Reservation: Fort Berthold Indian Reservation
Tribe: Three Affiliated Tribes
Responsible Official: [REDACTED], VP Operations
SIC Code: 1311 – Crude Petroleum and Natural Gas
AFS ID: 38-053-00029
Other CAA Permits: There are no other CAA permits for this facility.

Enforcement History

Targa was subject to a Consent Agreement and Final Order (Docket No.: CAA-08-2022-0002) for the following alleged violation of law at multiple Targa facilities based on EPA's field inspections on August 18, 2020:

1. Failure to submit 2019 Title V fee payment and annual emissions inventory on April 1, 2020, in violation of V-TAT-000670-2015.00, Sections VIII.A and B at Junction Compressor Station.
2. Failure to performance an initial performance test for engines EU 23, EU 24 and EU 25 within one year of startup in violation of V-TAT-000676-2014.00, Sections VII.D.2 and E, and 40 CFR § 60.5413 at Blue Buttes Compressor Station.
3. Failure to performance an initial performance on combustor EU 22 in violation of V-TAT-000676-2014.00, Section VI.B at Blue Buttes Compressor Station.
4. Failure to performance an initial performance on combustor EU 22 in violation of V-TAT-000676-2014.00, Section III.H.1, and 40 CFR § 60.5413 at Blue Buttes Compressor Station.
5. Failure to submit 2019 and 2020 Title V facility-wide reporting, annual fee payment, annual emissions inventory and compliance certifications in violation of V-TAT-000671-2013.00, Sections VII.A and B, and C.3. at Clarks Creek Compressor Station.
6. Failure to conduct an initial performance on combustor EU 34 in violation of V-TAT-000671-2013.00, Section III.G and 40 CFR § 60.5413 at Clarks Creek Compressor Station.
7. Failure to submit 2019 Title V compliance certification on April 1, 2020, in violation of V-TAT-000611-2017.00, Section VI.C.3. at Johnson Compressor Station.
8. Failure to report compressor rod packing hours in 2019 annual reporting in violation of 40 CFR § 60.5385a(a) and § 60.5420a(b)(4) at Johnson Compressor Station.
9. Failure to develop and utilize an optimal glycol circulation rate in violation of 40 CFR § 63.764(d)(2) at Johnson Compressor Station.
10. Failure to perform an initial performance test on combustor EU 45 in violation of 40 CFR 60.5410a(h)(4) at Johnson Compressor Station.
11. Failure to perform initial performance tests for engines EU 27 & EU 28 within one year of startup in violation of V-TAT-000839-2018.00, Sections II.D.2 and E, and 40 CFR § 60.4243(b)(2)(ii) at TAT-Blue Buttes Compressor Station.

For Docket No.: CAA-08-2022-0002 Targa paid a penalty of \$250,000.

Targa was subject to a Consent Agreement and Final Order (Docket No.: CAA-08-2019-0003) for the alleged violations of law for MACT ZZZZ at Targa Junction Compressor Station based on EPA's field inspections on June 14, 2016 and subsequent CAA section 114 information requests issued January 18, 2017. The EPA field inspections also found numerous deficiencies in the Title V application verses actual operational emission units at Blue Buttes, Junction and Clarks Creek compressor stations.

For Docket No.: CAA-08-2019-0003 Targa paid a penalty of \$220,000.

Inspection Findings/Areas of Concern

Multiple concerns were identified through the inspection and records review of the facility. A summary of areas of concerns are below:

1. EPA inspectors noted a higher gallon/minute glycol pump rate compared to what Targa provided in the annual glycol dehydrator report. Additionally, the report used incorrect calculation software to determine annual benzene.
2. During the onsite inspection, the enclosed combustion device (ECD) did not appear to be operating properly. Unburned hydrocarbon emissions were viewed via FLIR being continuously vented from the stack of the ECD. Looking through the site-glass it was determined that only 2 of the 10 arrays were lit.
3. EU 18 did not have the rod packing replaced before the compressor has operated for 26,000 hours according to § 60.5385(a)(1). The reciprocating compressor operated for 29810 hours before the rod packing was replaced according to information provided by Targa in the NSPS OOOO reports. Targa operated the reciprocating compressor rod packing associated with EU 18 for 3810 hours longer than allowed by NSPS OOOO, specifically § 60.5385(a)(1).

Compliance Assistance

A copy of this report, which highlights EPA's areas of concern, will be provided to Targa upon finalization.

Description of Operations¹

The Clark's Creek Compressor Station receives a comingled liquid stream containing natural gas, natural gas condensate and produced water from third-party production wells in the surrounding field. The inlet stream is routed to a 3-phase separator where liquids are gravimetrically separated. The natural gas condensate and produced water are routed to two condensate storage tanks and two produced water storage tanks, respectively. Vapor emissions from the condensate storage tanks are routed to an enclosed combustor for destruction. Once adequate volumes are accumulated in the storage tanks, the condensate and produced water are trucked off location for further processing or treatment.

Natural gas that exits the separator flows to four compressor engines (emissions units EU 1, EU 2, EU 18 and EU 33 in Table 2 below) which compress the gas before it enters a triethylene glycol (TEG) dehydration unit (emissions unit EU 25 in Table 2 below). The compressed natural gas enters emissions unit EU 25 and is bubbled up through lean TEG in a process vessel called a contactor. During this process, water vapor is removed from the gas to a concentration determined by a sales contract. The pipeline quality natural gas then exits the contactor, is metered and then routed off site. The rich TEG exits the contactor and is depressurized in a TEG flash tank. The emissions from the flash tank are routed to the atmosphere. The depressurized TEG is routed to and regenerated using heat in a vessel called a glycol reboiler. Methanol is injected at different points to the rich TEG to prevent hydrates from forming. Pneumatic pumps that control the injection rate vent to the atmosphere. The vapors from the reboiler are also routed to the atmosphere. The regenerated lean TEG is circulated back to the contactor.

General Inspection Observations and Commentary

EPA representatives [REDACTED], and tribal representative [REDACTED] met with Targa representatives at Clarks Creek Compressor Station (Clarks Creek) operated by Targa at 8:12 AM on June 15, 2023. A Job Safety Analysis was conducted by Targa representatives, and Targa was informed that EPA inspectors would be using an intrinsically safe forward looking infrared (FLIR) camera and a geospatial mapping of air pollution (GMAP) vehicle. No hot work permit

¹ The description of operations provided here is a modified excerpt from the process description from the Title V Permit, V-TAT-000671-2013.00.

was required. EPA inspector [REDACTED] informed Targa representatives that the environmental manager would receive lists of questions to assist in the records review portion regarding the operations at Clarks Creek.

Targa representatives discussed the following throughputs at the time of the inspection:

1. Approximately 3-5 truck loadouts per week. 160 to 180 bbl of water is hauled out once per week. 2 to 4 truck loadouts of oil is hauled, each truck can hold 220 bbls of oil.
2. Maximum natural gas throughput capacity is 15-16 MMscf/d.
3. Natural gas throughput at time of inspection: 13.2 MMscf/d
4. Exit pressure of natural gas is 970 psi.

The following observations were taken during the facility walkthrough:

1. The enclosed combustion device (ECD) was continuously venting unburned hydrocarbon emissions as seen on the FLIR camera (MOV_3307.mp4). EPA inspectors looked through the site glass and confirmed that only 2 burners were lit on the approximately 10 burner array on the Tripoint ECD (Serial number: 82067). Additionally, the temperature probe on the Tripoint screen noted the temperature inside the stack of the ECD was only 97°F.
2. No tanks were venting emissions when viewed with the FLIR camera.
3. The dehydration unit glycol pump, model Kimray 21020 PV, was counted to pump at approximately 12 strokes per minute. Emissions from the dehydration unit reboiler are routed to a tank that vents emissions to the atmosphere. According to information provided below from Kimray, 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 Targa calculated in their GLYCalc report from the Title V application (0.5 gpm), and the recent 2022 ProMax report provided during the records review which shown below:

Lean Glycol Specifications	
Glycol Circulation Rate (sgpm)	1.00

4. See below for engine details recorded during the onsite walkthrough:

Engine*	Manufacture date	Engine model/serial number	Pre Cat Temp (°F)	Pre Cat Temp (°F)	dP (inches H ₂ O)	Engine Load (%)	Operating hours
EU 2	December, 2005	C-10720-1	Not monitored by Targa	Not monitored by Targa	Not monitored by Targa	89	92261
EU 18	March, 2009	Model: WPW02848 SN:2733063	Not monitored by Targa	Not monitored by Targa	Not monitored by Targa	Not monitored by Targa	Not monitored by Targa
EU 33	January, 2015	Model: L57494GSI SN:5283704413	Not monitored by Targa	Not monitored by Targa	Not monitored by Targa	71.7	49279
EU 1	No engine plate	No engine plate	Not monitored by Targa	Not monitored by Targa	Not monitored by Targa	88	73227.5

* Engine identifiers differ from onsite identifiers. EPA inspectors attempted to match the engine information with Table 2 below.

**Engine information that notes: “Not monitored by Targa” means that the monitoring data during the onsite inspection was either not programed to the engine control unit (ECU), not operational at the ECU, or the physical monitoring probes did not appear connected to the ECU.

EPA and Targa representative met for a closing conference. A confidential business information (CBI) warning was presented to EOG representatives, and no CBI was claimed. During the on-site closing conference, Mr. [REDACTED] discussed emissions bypassing the ECD that were discovered by EPA inspectors onsite, and that Mr. [REDACTED] will be requesting information via email about certain operating parameters.

EPA inspectors drove the GMAP vehicle through certain areas of the facility which recorded ambient conditions of multiple pollutants including total VOC (TVOC) and benzene emissions. A full report of the GMAP records and canister samples will be provided by EPA NEIC at a later date.

EPA staff departed the facility at 9:11 AM. An email to request relevant compliance-related information and records was sent to [REDACTED] prior to the onsite inspection on June 13, 2023. [REDACTED] provided the requested information to EPA via email on July 14, 2023.

Potential to Emit (PTE)

Pursuant to 40 CFR 52.21, potential to emit (PTE) is defined as the maximum capacity of a stationary source to emit a pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored or processed, shall be treated as part of its design if the limitation, or the effect it would have on emissions, is federally enforceable. Independently enforceable applicable requirements are considered enforceable to the extent that the source is in compliance with the standard. In addition, beneficial reductions in non-targeted pollutants resulting from compliance with an independently enforceable applicable requirement may be counted towards PTE provided the emission reduction of the non-targeted pollutant is enforceable as a practical matter and compliance is being met. See the 1995 guidance memo signed by John Seitz, Director of the Office of Air Quality Planning and Standards titled, "Options for Limiting Potential to Emit of a Stationary Source under section 112 and Title V of the Clean Air Act (CAA)."

Targa reported the controlled emissions unit-specific PTE in their Part 71 permit application. The PTE in Table 1 are based on the applicable legally and practicably enforceable requirements.

Table 1: Potential to Emit in Tons Per Year (tpy)
Targa Clarks Creek

Table 1 – Potential-to-Emit With Legally and Practicably Enforceable Controls

Emissions Unit Id.	NO_x* (tons/yr)	VOC (tons/yr)	SO₂ (tons/yr)	PM (tons/yr)	CO (tons/yr)	Lead (tons/yr)	CO₂e (tons/yr)	HAPs (tons/yr)
EU 1	20.95	8.07	0.02	0.72	26.51	-	-	4.46
EU 2	112.90	1.50	0.02	0.10	91.46	-	-	0.68
EU 7	-	108.01	-		-	-	1349.98	1.29
EU 13	-	17.53	-	-	-	-	-	0.21
EU 14	-	30.33	-	-	-	-	-	1.44
EU 15	-	27.75	-	-	-	-	-	2.21
EU 16	-	-	-	-	-	-	-	-
EU 17	-	17.85	-	-	-	-	-	0.77
EU 18	25.88	6.09	0.03	0.86	24.07	-	-	3.73
EU 22		-				-	-	-
EU 25		24.38				-	-	1.95
EU 26	0.29	0.02	0.01	0.02	0.25	-	-	0.01
EU 33	13.33	1.33				-	-	1.56
EU 34	12.33	9.93	0.03	0.09	26.65	-	-	0.35
IEU	0.21	0.10	0.01	0.04	0.18	-	-	0.10
TOTAL	185.90	225.10*	0.09	4.48	174.98	-	14,658	18.68

*NO_x = nitrogen oxide; VOC = volatile organic compound; SO₂ = sulfur dioxide; PM = particulate matter; CO = carbon monoxide; CO₂e = carbon dioxide equivalent; HAP = hazardous air pollutant. PTE totals do not include fugitive emissions.

Federally Enforceable Requirements and Compliance Status

Inspector notes discussing compliance status will follow each relevant permit requirement in **bold blue** font.

Table 2 – Emissions Units and Emissions-Generating Activities

Emissions Unit ID	Description	Control Equipment
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	None
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	None
EU 5	One 0.5 MMBtu/hr Tank Heater	None (Insignificant Emission Unit)
EU 7	10 Pneumatic Pumps	None
EU 8	One 2000-gallon Methanol Storage Tank	None (Insignificant Emission Unit)
EU 9 EU 23	Two 400 bbl* Produced Water Tanks	Vapor Combustor (EU 34) (Insignificant Emission Unit. Control not enforceable)
EU 10	Produced Water Loadout	None (Insignificant Emission Unit)
EU 12	Building Heaters	None (Insignificant Emission Unit)
EU 13	Low and Intermittent Bleed Pneumatic Devices	None
EU 14	Nine PIG Launchers/Receivers: six 8-inch, three 10-inch	None
EU 15	Fugitive Emissions	None
EU 16 EU 22	Two 400 bbl* Condensate Tanks	Vapor Combustor (EU 34)
EU 17	Condensate Loading	None
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	None
EU 21	One 500-gallon Methanol Storage Tank	None (Insignificant Emission Unit)
EU 25	One 22MMscfd* Dehydrator Process Vent	None
EU 26	One 0.682 MMBtu/hr* Glycol Reboiler	

EU 27 EU 28 EU 29 EU 30	Four 500-gallon Lube Oil Tanks	None (Insignificant Emission Unit)
EU 31	One 500-gallon Antifreeze Tank	None (Insignificant Emission Unit)
EU 32	One 500-gallon TEG Tank	None (Insignificant Emission Unit)
EU 33	Waukesha L5794GSI, 10.55MMBtu/hr*, 1380 hp*, 4SLB Natural Gas Compressor Engine: Serial Number: 5283704413 7/1/2008 Installed: 7/28/2018 Manufactured After to	NSCR*
EU 34	One Vapor Combustor	None

*MMBtu/hr = million British thermal units per hour; hp = horsepower; MMscfd = million standard cubic feet per day; bbl = barrel; 4SLB = 4 Stroke Lean-Burn, 4SRB = 4 Stroke Rich-Burn; NSCR = non-selective catalytic reduction.

OBSERVATION: EPA inspectors confirmed each emissions unit for matching make, model, and serial number information from the nameplates matched the information listed in Table 2 above from Targa's Title V, unless otherwise noted.

Table 3: Requirements for Emission Units

Equipment	Applicable Requirements	Limitations	Monitoring	
			Method	Interval
EU 1	None	None (Gap)	NA	NA
EU 2	MACT ZZZZ	Work Practice Standards	Hoses, oil changes, equipment inspections	2,160 hours of ops
EU 5	NA	NA	NA	NA
EU 7	NA	NA	NA	NA
EU 8	NA	NA	NA	NA
EU 9 EU 23	NA	NA	NA	NA
EU 10	NA	NA	NA	NA
EU 12	NA	NA	NA	NA
EU 13	NA	NA	NA	NA
EU 14	NA	NA	NA	NA
EU 15	NA	NA	NA	NA
EU 16 EU 22	NSPS OOOO	Cover and CVS	Route emissions to control device	Continuous

EU 17	NA	NA	NA	NA
EU 18	NSPS JJJJ	NO _x = 2.0 g/hp-hr CO = 4.0 g/hp-hr VOC = 1.0 g/hp-hr	Performance test	Every 8,760 hours of op or 3 years
EU 21	NA	NA	NA	NA
EU 25	MACT HH	85,000 scf/day or 0.90 megagram benzene per year	Meter or GLYCalc	Annual
EU 26				
EU 27 EU 28 EU 29 EU 30 EU 31	NA	NA	NA	NA
EU 32	NA	NA	NA	NA
EU 33	NSPS JJJJ	NO _x = 1.0 g/hp-hr CO = 2.0 g/hp-hr VOC = 0.7 g/hp-hr	Performance test	8,760 hrs of op or 3 yrs, whichever is first
	NSPS OOOOa	Rod Packing	Change the rod packing	Replace every 26,000 hours or 36 months.
EU 34	NSPS OOOO	95.0% DRE	Performance test	Every 60 months

I. Standards of Performance for Stationary Spark Ignition (SI) Internal Combustion Engines (ICE) - 40 CFR Part 60, Subpart JJJJ

A. Applicability [40 CFR 60.4230(a)(4)(i)-(ii)]

40 CFR part 60, subpart JJJJ (Subpart JJJJ) applies to the following engines:

1. Caterpillar G3516LE engine identified as Emissions Unit EU 18 in Table 2 of this permit; and
2. Waukesha L5794GSI engine identified as Emissions Unit EU 33 in Table 2 of this permit.

OBSERVATION: Engines EU 18 and EU 33 were manufactured after the NSPS JJJJ trigger dates and are therefore subject to NSPS JJJJ.

The other engines operating at Clarks Creek, EU 1 and EU 2, were manufactured prior to July 1, 2008 and are not subject to the requirements of NSPS JJJJ.

B. General Provisions [40 CFR 60.4246]

1. The General Provisions at 40 CFR part 60, subpart A apply as specified in Table 3 of 40 CFR part 60, subpart JJJJ. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR part 60, subpart A.
2. All reports required under 40 CFR part 60, subpart A shall be sent to the EPA at the following address as listed in §60.4:

U.S. Environmental Protection Agency, Region 8
Enforcement and Compliance Assurance Division
Chief, Air Enforcement Branch, 8ENF-AT
1595 Wynkoop Street
Denver, Colorado 80202-1129

C. Emission Standards [40 CFR 60.4233(e), 60.4234, and Table 1]

The Permittee, as an owner and operator of a non-emergency SI ICE with a maximum engine power greater than or equal to 100 horsepower (hp), shall comply with the emission standards in Table 1 of Subpart JJJJ over the entire life of the engine:

1. Emission Standards for Non-Emergency, Natural Gas-Fired SI ICE, EU 18, with maximum engine hp greater than 500 hp and less than 1,350 hp.
 - (a) 2.0 gram per horsepower-hour (g/hp-hr) for nitrogen oxides (NO_x);
 - (b) 4.0 g/hp-hr for carbon monoxide (CO); and
 - (c) 1.0 g/hp-hr for volatile organic compounds (VOC).
2. Emission Standards for Non-Emergency, Natural Gas-Fired SI ICE, EU 33, with maximum engine hp greater than 500 hp.
 - (a) 1.0 gram per horsepower-hour (g/hp-hr) for NO_x;
 - (b) 2.0 g/hp-hr for CO; and
 - (c) 0.7 g/hp-hr for VOC.

OBSERVATION: See Table 4 below for recent performance tests. Targa conducts each test using ASTM D6348-03 at 3x1 hour runs for each engine as required in NSPS JJJJ. The engines at Clarks Creek have shown compliance with the emission standards during each performance test.

Table 4: NSPS JJJJ Performance Tests

Emission Unit ID	Test Date	NO _x (g/hp-hr)	CO (g/hp-hr)	VOC (g/hp-hr)	Average Load (%)
EU-33	8/3/2021	0.077	0.95	0.016	91.3
EU-18	8/3/2021	1.372	0.171	0.338	91.7
EU-33	8/3/2022	0.357	1.28	0.017	94
EU-18	8/3/2022	0.789	0.122	0.174	91.26

D. Compliance Requirements [40 CFR 60.4243(b)]

The Permittee, as the owner and operator of stationary SI ICE that must comply with the emission standards specified in Section II.C. of this permit, shall demonstrate compliance according to one of the methods specified in paragraphs 1 or 2 of this section, as applicable:

1. Purchasing an engine certified according to the procedures specified in Subpart JJJJ for the same model year and demonstrating compliance according to one of the methods specified in paragraphs 1. (a) or (b) of this section:
 - (a) If the Permittee operates and maintains the certified stationary SI ICE and control device according to the manufactures emission-related written instructions, the Permittee shall keep records of conducted maintenance to demonstrate compliance, but no performance testing is required. The Permittee shall also meet requirements as specified in 40 CFR 1068 subparts A through D, as applicable. If the Permittee adjusts engine settings according to and consistent with the manufacturer's instructions, the stationary SI ICE will not be considered out of compliance; or
 - (b) If the Permittee does not operate and maintain the certified stationary SI ICE and control device according to the manufactures emission-related written instructions, the engine will be considered a non-certified engine and the Permittee shall demonstrate compliance according to §§60.4243(a)(2)(iii); or
2. Purchasing a non-certified engine and demonstrating compliance with the emission standards specified in Section II.C. of this permit and according to the test methods and other procedures specified in §60.4244, and according to the following:

As an owner or operator of a stationary SI ICE greater than 500 hp, the Permittee shall keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, the Permittee shall conduct an initial performance test and conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first, thereafter to demonstrate compliance.

OBSERVATION: See Table 4 above for recent performance tests. Targa conducts each test using ASTM D6348-03 at 3x1 hour runs for each engine as required in NSPS JJJJ. The engines at Clarks Creek have shown compliance with the emission standards during each performance test.

E. Testing Requirements [40 CFR 60.4244]

For each performance test required, the Permittee shall comply with the procedures as specified in §60.4244(a)-(f).

OBSERVATION: See Table 4 above for recent performance tests. Targa conducts each test using ASTM D6348-03 at 3x1 hour runs for each engine as required in NSPS JJJJ. The engines at Clarks Creek have shown compliance with the emission standards during each performance test.

F. Notifications, Reports, and Records for Owners and Operators [40 CFR 60.4245]

1. The permittee shall keep records according to §60.4245(a);
2. The Permittee shall submit initial notification as required in §60.7(a)(1) and §60.4245(c); and
3. The Permittee shall submit a copy of each performance test as conducted in §60.4244 within 60 days

after the test has been completed according to §60.4245(d).

OBSERVATION: Targa submits reports as required for Clarks Creek. Records requested during the inspection were provided to EPA inspectors.

II. Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction, Modification or Reconstruction Commenced After August 23, 2011, and on or before September 18, 2015 - 40 CFR Part 60, Subpart OOOO

A. Applicability [40 CFR 60.5365(e)]

1. 40 CFR part 60, subpart OOOO applies to the storage vessels identified as Emissions Units EU 16 and EU 22, and the associated vapor combustor identified as Emissions Unit EU 34 in Table 2 of this permit:
 - (a) EU 16 was constructed after August 23, 2011 and before April 12, 2013 and therefore is a Group 1 storage vessel.
 - (b) EU 22 was constructed after April 12, 2013 and before September 18, 2015 and therefore is a Group 2 storage vessel.
2. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR part 60, subpart OOOO for storage vessel affected facilities.

OBSERVATION: EU 16 and EU 22 are storage vessels that were constructed after August 23, 2011 and before September 18, 2015. The trigger dates for compliance for either a Group 1 or Group 2 storage vessel were assessed in previous inspection reports.

OBSERVATION: According to information provided by Targa, the reciprocating compressor associated with EU 18 was installed on September 4, 2014 and is therefore, subject to the reciprocating compressor requirements of NSPS OOOO. EPA will assess compliance with EU 18 as it pertains to NSPS OOOO

B. General Standards [40 CFR part 60, subpart A and 60.5425]

1. The General Provisions at 40 CFR part 60, subpart A apply as specified in Table 3 of 40 CFR part 60, subpart OOOO. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR part 60, subpart A.
2. All reports required under 40 CFR part 60, subpart A shall be sent to the EPA at the following address as listed in §60.4:

U.S. Environmental Protection Agency, Region 8
Enforcement and Compliance Assurance Division
Chief, Air Enforcement Branch, 8ENF-AT
1595 Wynkoop Street
Denver, Colorado 80202-1129

C. General Compliance Requirements [40 CFR 60.5370]

At 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. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the EPA which may include but is not limited to, monitoring results, opacity observations, review of operating and maintenance

procedures and inspection of the source.

OBSERVATION: The closed vent system for the storage vessels appeared to be operating without detectable emissions.

Area of Concern: The ECD was continuously venting emissions as seen on the FLIR camera (MOV_3307.mp4). EPA inspectors looked through the site glass and confirmed that only 2 burners were lit on the approximately 10 burner array on the Tripoint ECD (Serial number: 82067). Additionally, the temperature probe on the Tripoint screen noted the temperature inside the stack of the ECD was only 97°F.

OBSERVATION: EU 18 is subject to the Applicable Standards for Reciprocating Compressor Affected Facilities found in § 60.5385(a). As specified in § 60.5385(a), Targa shall replace the reciprocating compressor rod packing of EU 18 either: Before the compressor has operated for 26,000 hours or prior to 36 months from the date of the most recent rod packing replacement. Targa has elected to comply with the requirement to change the rod packing before the compressor has operated for 26,000 hours according to § 60.5385(a)(1).

Area of Concern: EU 18 did not have the rod packing replaced before the compressor has operated for 26,000 hours according to § 60.5385(a)(1). The reciprocating compressor operated for 29810 hours before the rod packing was replaced according to information provided by Targa in the NSPS OOOO reports. Targa operated the reciprocating compressor rod packing associated with EU 18 for 3810 hours longer than allowed by NSPS OOOO, specifically § 60.5385(a)(1).

D. Applicable Standards for Storage Vessel Affected Facilities [40 CFR 60.5395]

1. The Permittee shall comply with the notification requirements identifying the Group 1 storage vessel, EU 16, as specified in §60.5395(b) and Condition D.2 of this section.
2. The Permittee shall comply with either of the following requirements for emissions units EU 16 and EU 22 as specified in §60.5395(d)-(e):
 - (a) Reduce VOC emissions by 95.0% by weight or greater according to the schedule specified in §60.5395 (d)(1)(i)-(ii) and:
 - (i) Equip the storage vessels with a cover that meets the requirements of §60.5411(b) and is connected through a closed vent system that meets the requirements of §60.5411(c), and route emissions to a control device that meets the conditions specified in §60.5412(c) and (d); or,
 - (ii) Route the closed vent system to a process as an alternative to routing the closed vent system to a control device.
 - (b) Maintain the uncontrolled actual VOC emissions from the storage vessel affected facility at less than 4 tons per year (tpy) without considering control according to §60.5395(d)(2).
3. The Permittee shall comply with the requirements for storage vessels that are removed from service or returned to service according to §60.5395(f)

OBSERVATION: The closed vent system for the storage vessels appeared to be operating with no detectable emissions.

Area of Concern: The ECD was continuously venting emissions as seen on the FLIR camera (MOV_3307.mp4). EPA inspectors looked through the site glass and confirmed that only 2 burners were lit on the approximately 10 burner array on the Tripoint ECD (Serial number: 82067). Additionally, the

temperature probe on the Tripoint screen noted the temperature inside the stack of the ECD was only 97°F.

E. Initial Compliance for Storage Vessel Affected Facilities [40 CFR 60.5410(h) and (i)]

1. The Permittee shall demonstrate initial compliance for storage vessels EU 16 and EU 22 according to §60.5410(h).
2. The Permittee shall submit notification of initial compliance for the Group 1 storage vessel EU 16 according to §60.5410(i).

OBSERVATION: Initial compliance was determined during previous inspections and was not evaluated during the 2023 inspection.

OBSERVATION: According to information provided by Targa, the reciprocating compressor associated with EU 18 was installed on September 4, 2014 and is therefore, subject to the reciprocating compressor requirements of NSPS OOOO. As such, the reciprocating compressor shall demonstrate initial compliance according to § 60.5410(c) to continuously monitor the number of hours of operation.

Area of Concern: EU 18 did not have the rod packing replaced before the compressor has operated for 26,000 hours according to § 60.5385(a)(1). The reciprocating compressor operated for 29810 hours before the rod packing was replaced according to information provided by Targa in the NSPS OOOO reports. Targa operated the reciprocating compressor rod packing associated with EU 18 for 3810 hours longer than allowed by NSPS OOOO, specifically § 60.5385(a)(1).

G. Additional Storage Vessel Requirements to Determine Initial Compliance for Cover and Closed Vent Systems and Control Devices [40 CFR 60.5411 and 40 CFR 60.5412]

1. The Permittee shall meet the applicable requirements for each cover and closed vent system to comply with the emission standards for storage vessels EU 16 and EU 22 as specified in §60.5411(b) and (c).
2. The Permittee shall meet the applicable requirements for control device EU 34 used to comply with the emission standards for storage vessels EU 16 and EU 22 as specified in §60.5412(d).

OBSERVATION: Initial compliance was determined during previous inspections and was not evaluated during the 2023 inspection. See below for the most recent performance test.

G. Performance Testing and Continuous Compliance Storage Vessel Requirements [40 CFR 60.5413 and 40 CFR 60.5415]

1. The Permittee shall demonstrate that the control device, EU 34, achieves the performance requirements of reducing VOC emissions by 95.0% by weight or greater from EU 16 and EU 22 using the performance test methods and procedures specified in this section according to §60.5413.
2. The Permittee shall demonstrate continuous compliance with the standards for storage vessel affected facilities according to §60.5415(e).

OBSERVATION: The closed vent system for the storage vessels appeared to be operating without detectible emissions. Performance tests for the ECD were conducted according to Method 25A per § 60.5413(b) on November 17, 2020. Targa elected to comply with the requirement of § 60.5412(d)(1)(iv)(B) which is to reduce the concentration of TOC in the exhaust gases at the outlet to the device to a level equal to or less than 275 parts per million by volume as propane on a wet basis corrected to 3 percent oxygen. The performance test showed the ECD is capable of complying with this requirement.

Performance test results: 20.3 ppmv @ 3% O2 wet basis.

Area of Concern: The ECD was continuously venting unburned hydrocarbon emissions as seen on the FLIR camera (MOV 3307.mp4). EPA inspectors looked through the site glass and confirmed that only 2 burners were lit on the approximately 10 burner array on the Tripoint ECD (Serial number: 82067). Additionally, the temperature probe on the Tripoint screen noted the temperature inside the stack of the ECD was only 97°F.

OBSERVATION: According to information provided by Targa, the reciprocating compressor associated with EU 18 was installed on September 4, 2014 and is therefore, subject to the reciprocating compressor requirements of NSPS OOOO. As such, the reciprocating compressor shall demonstrate continuous compliance according to § 60.5415(c) to continuously monitor the number of hours of operation.

Area of Concern: EU 18 did not have the rod packing replaced before the compressor has operated for 26,000 hours according to § 60.5385(a)(1). The reciprocating compressor operated for 29810 hours before the rod packing was replaced according to information provided by Targa in the NSPS OOOO reports. Targa operated the reciprocating compressor rod packing associated with EU 18 for 3810 hours longer than allowed by NSPS OOOO, specifically § 60.5385(a)(1).

H. Initial and Continuous Storage Vessel and Cover and Closed Vent System Monitoring Requirements [40 CFR 60.5416 and 40 CFR 60.5417]

1. The Permittee shall inspect each cover, closed vent or bypass system at least once every month and comply with the requirements according to the procedures and schedule according to §60.5416(c).
2. The Permittee shall meet the applicable requirements to demonstrate continuous compliance for control device EU 34 used to meet emission standards for EU 16 and EU 22 according to §60.5417(h).

OBSERVATION: The closed vent system for the storage vessels appeared to be operating without detectible emissions. Performance tests for the ECD were conducted according to Method 25A per § 60.5413(b) on November 17, 2020. Targa elected to comply with the requirement of § 60.5412(d)(1)(iv)(B) which is to reduce the concentration of TOC in the exhaust gases at the outlet to the device to a level equal to or less than 275 parts per million by volume as propane on a wet basis corrected to 3 percent oxygen. The performance test showed the ECD is capable of complying with this requirement.

Performance test results: 20.3 ppmv @ 3% O2 wet basis.

EPA inspectors requested NSPS OOOO reports from Targa to review inspections as well as repairs conducted as a result of the monthly inspections. Targa provided those records upon request on July 14, 2023.

Area of Concern: The ECD was continuously venting unburned hydrocarbon emissions as seen on the FLIR camera (MOV 3307.mp4). EPA inspectors looked through the site glass and confirmed that only 2 burners were lit on the approximately 10 burner array on the Tripoint ECD (Serial number: 82067). Additionally, the temperature probe on the Tripoint screen noted the temperature inside the stack of the ECD was only 97°F.

I. Notification, Reporting and Recordkeeping Requirements [40 CFR 60.5420]

The Permittee shall perform the notification, reporting, and recordkeeping requirements as specified in §60.5420, as applicable.

OBSERVATION: Targa provided reports as requested to EPA inspectors during the records review.

III. Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 - 40 CFR Part 60, Subpart OOOOa

A. Applicability [40 CFR 60.5365a(c) and (j)]

40 CFR part 60, subpart OOOOa applies to the reciprocating compressor on emissions unit EU 33 and the collection of fugitive emissions components, as defined at §60.5430a.

OBSERVATION: The reciprocating compressor associated with engine EU 33 was commenced construction after September 18, 2015, and therefore is an affected unit under NSPS OOOOa.

B. General Compliance Requirements [40 CFR 60.5370a]

At all times, including during startup, shutdown and malfunction, the Permittee shall maintain and operate the reciprocating compressor and collection of fugitive emission components, air pollution control and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the EPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures and inspection of the source.

OBSERVATION: No equipment leaks were seen via FLIR while onsite. Note: see above in NSPS OOOO for ECD discussion.

C. Greenhouse Gas (GHG) and VOC Emissions Standards for Reciprocating Compressor Affected Facilities [40 CFR 60.5385a]

The Permittee shall comply with the following standards for each reciprocating compressor affected facility:

1. Replace the reciprocating compressor rod packing according to §60.5385a(a).
2. Demonstrate initial compliance with standards that apply to the reciprocating compressor affected facilities as required by §60.5410a(c).
3. Demonstrate continuous compliance with standards that apply to reciprocating compressor affected facilities as required by §60.5415a(c).
3. Perform reporting requirements as specified by §60.5420a(b)(1) and (4) and the recordkeeping as required by §§60.5420a(c)(3), (6) through (9), and (17), as applicable.

OBSERVATION: Targa provided records regarding rod packing replacement for EU 33 that occurred last July 17, 2020. The date of startup was July 31, 2017 and therefore was replaced both before 3 years of operation and less than 26,000 hours of operation.

D. GHG and VOC Standards for the Collection of Fugitive Emissions Components [40 CFR 60.5397a]

The Permittee shall reduce GHGs (in the form of a limitation on emissions of methane), and VOC emissions by complying with the requirements in §§60.5397a(a)-(j).

OBSERVATION: No equipment leaks were seen via FLIR while onsite. Note: see above in NSPS OOOO for ECD discussion.

E. Initial Compliance Requirements for Reciprocating Compressor and Fugitive Emission Components Affected Facilities [40 CFR 60.5410a(c) and (j)]

1. The Permittee shall achieve initial compliance for each reciprocating compressor affected facility by complying with §§60.5310a(c)(1) - (4).
2. The Permittee shall achieve initial compliance with the fugitive emission standards for each collection of fugitive emissions components by complying with §§60.5410a(j)(1) - (5).

OBSERVATION: Initial compliance was determined during previous inspections and was not evaluated during the 2023 inspection. Targa complies with § 60.5410a(c) (Note: incorrectly listed as §60.5310a(c) in this permit) by monitoring the hours of operation of the unit.

F. Additional Requirements for Initial Compliance for Covers and Closed Vent Systems for Reciprocating Compressors [40 CFR 60.5411a]

To comply with the emission standards for reciprocating compressors the Permittee shall meet the applicable requirements for each cover and closed vent system in §§60.5411a(a) and (d).

OBSERVATION: Initial compliance was determined during previous inspections and was not evaluated during the 2023 inspection.

Note: The reciprocating compressors at Clarks Creek do not collect rod packing emissions and route those emissions to a process, therefore this permit condition is not applicable.

H. Continuous Compliance Requirements for Reciprocating Compressor and Fugitive Emissions Components Affected Facilities [40 CFR 60.5415a]

1. The Permittee shall demonstrate continuous compliance for the reciprocating compressor according to §60.5415a(c).
2. The Permittee shall demonstrate continuous compliance for each collection of fugitive emission components according to §60.5415a(h).

OBSERVATION: The reciprocating compressor demonstrates continuous compliance according to § 60.5415a(c) to continuously monitor the number of hours of operation.

No equipment leaks were seen via FLIR while onsite (note: see above in NSPS OOOO for ECD discussion). Targa provided records of AVO's and periodic monitoring surveys according to § 60.5415a(h).

H. Initial and Continuous Cover and Closed Vent System Inspection and Monitoring Requirements for Reciprocating Compressors [40 CFR 60.5416a]

To comply with the applicable requirements for each closed vent system or cover at reciprocating compressor affected facilities, the Permittee shall comply with the requirements of §§60.5416a(a) through (c).

OBSERVATION: The reciprocating compressors at Clarks Creek do not collect rod packing emissions and route those emissions to a process, therefore this permit condition is not applicable.

I. Reporting and Recordkeeping Requirements [40 CFR 60.5420a(b) and (c)]

1. The Permittee shall submit annual reports for reciprocating compressors affected facilities containing the information specified in §§60.5420a(b)(1), (4), (7), (9) and (11).
2. The Permittee shall maintain all records identified as specified in §60.7(f) and in §§60.5420a(c)(3), (6-9) and (15).

OBSERVATION: Targa provided records of fugitive emissions surveys however Targa noted the rod packing associated with EU 33 in the NSPS OOOO report and not in the NSPS OOOOa report.

J. General Standards [40 CFR 60.5425a]

1. The General Provisions at 40 CFR part 60, subpart A apply as specified in Table 3 of 40 CFR part 60, subpart OOOOa. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR part 60, subpart A.
2. All reports required under 40 CFR part 60, subpart A shall be sent to the EPA at the following address as listed in §60.4:

U.S. Environmental Protection Agency, Region 8
Enforcement and Compliance Assurance Division
Chief, Air Enforcement Branch, 8ENF-AT
1595 Wynkoop Street
Denver, Colorado 80202-1129

IV. National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities - 40 CFR Part 63, Subpart HH

A. Applicability [40 CFR 63.760(b)(2) and (c)]

1. 40 CFR part 63, subpart HH applies to the TEG Dehydration Unit identified as Emissions Unit EU 25 in Table 2 of this permit.
2. The Permittee has determined that the facility it is not a major source but has actual emissions of 5 tpy or more of a single hazardous air pollutants (HAP), or 12.5 tpy or more of a combination of HAP (*i.e.*, 50% of the major source thresholds), and shall update its major source determination within 1 year of the prior determination, and each year thereafter, using gas composition data measured during the preceding 12 months.
3. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR part 63, subpart HH for small glycol dehydration units located at an area source of HAP.

OBSERVATION: Targa Clarks Creek operates a triethylene dehydration unit at an area source that is not located at any UA plus offset and UC boundary and is therefore subject to certain requirements of Part 63 Subpart HH.

B. General Standards [40 CFR part 63, subpart A and 63.764]

1. The General Provisions at 40 CFR part 63, subpart A apply as specified in Table 2 of 40 CFR part 63, subpart HH. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR part 63, subpart A.

2. All reports required under 40 CFR part 63, subpart A shall be sent to the EPA at the following address as listed in §63.13:

U.S. Environmental Protection Agency, Region 8
Enforcement and Compliance Assurance Division
Chief, Air Enforcement Branch, 8ENF-AT
1595 Wynkoop Street
Denver, Colorado 80202-1129
3. As specified in §63.764(e), the Permittee is exempt from control requirements for glycol dehydration unit process vents, and monitoring requirements because at the time of this permit issuance:
 - (a) The annual average flowrate of natural gas to the glycol dehydration unit is less than 85 thousand standard cubic meters per day; or
 - (b) The actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere are less than 0.90 megagram per year.
4. At all times, the Permittee shall operate and maintain any glycol dehydration unit, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the EPA which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records and inspection of the unit.
5. If a process change is made, or a change in any of the information submitted in the Notification of Compliance Status Report, the Permittee shall submit a report within 180 days after the process change is made or as a part of the next Periodic Report as specified in §63.775(e), whichever is sooner, as specified in §63.775(f), and, shall comply with all applicable requirements of 40 CFR part 63, subpart HH.

Area of Concern: The dehydration unit glycol pump, model Kimray 21020 PV, was counted to pump at approximately 12 strokes per minute. Emissions from the dehydration unit reboiler are routed to a tank that vents emissions to the atmosphere. According to information provided below from Kimray, 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 Targa calculated in their 2022 ProMax report shown below:

Lean Glycol Specifications	
Glycol Circulation Rate (sgpm)	1.00

Area of Concern: It cannot be determined if Targa is complying with the requirement to maintain actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere are less than 0.90 megagram per year because the operating parameters did not correspond to the information provided. Targa used ProMax to determine the benzene concentration in their recent 2022 annual report, which according to § 63.773(d)(3)(i)(H)(1), shall only be used when determining continuous monitoring systems for control devices tested under § 63.772(h). Targa does not use any control device to control emissions from the dehydration unit. As specified in § 63.772(b)(2)(i), the determination of actual average benzene or BTEX emissions from a glycol dehydration unit shall be made using the model GRI-GLYCalc™, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc™ Technical Reference Manual.

C. Test Methods, Compliance Procedures and Compliance Determination Requirements [40 CFR 63.772]

The Permittee shall determine compliance with the requirements of 40 CFR part 63, subpart HH using the applicable test methods and compliance procedures for the determination of glycol dehydration unit natural gas flowrate, benzene emissions or benzene, toluene, ethylbenzene and xylene (BTEX) emissions specified in §63.772(b).

1. The determination of actual flowrate of natural gas to a glycol dehydration unit shall be made by either:
 - (a) Installing and operating a monitoring instrument that directly measures natural gas flowrate to the glycol dehydration unit with an accuracy no less than plus or minus 2%. The Permittee shall convert annual natural gas flowrate to a daily average by dividing the annual flowrate by the number of days per year the glycol dehydration unit processed natural gas; or
 - (b) Document, to the EPA's satisfaction, the actual annual average natural gas flowrate to the glycol dehydration unit.
2. The determination of actual average benzene or BTEX emissions from a glycol dehydration unit shall be made using the procedures of either following paragraph of this section. Emissions shall be determined either uncontrolled, or with federally enforceable controls in place.
 - (a) Determine actual average benzene or BTEX emissions using the model GRI-GLYCalc™, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc™ 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); or,
 - (b) Determine an average mass rate of benzene or BTEX emissions in kilograms per hour through direct measurement using the methods in §63.772(a)(1)(i) or (ii), or an alternative method according to §63.7(f). Annual emissions in kilograms per year shall be determined by multiplying the mass rate by the number of hours the unit is operated per year. This result shall be converted to megagrams per year.

OBSERVATION: Targa appears to comply with § 63.764(e) by complying with the requirement to maintain the actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere are less than 0.90 megagram per year.

Area of Concern: The dehydration unit glycol pump, model Kimray 21020 PV, was counted to pump at approximately 12 strokes per minute. Emissions from the dehydration unit reboiler are routed to a tank that vents emissions to the atmosphere. According to information provided below from Kimray, 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 Targa calculated in their 2022 ProMax report shown below:

Lean Glycol Specifications	
Glycol Circulation Rate (sgpm)	1.00

Area of Concern: It cannot be determined if Targa is complying with the requirement to maintain actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere are less

than 0.90 megagram per year because the operating parameters did not correspond to the information provided. Targa used ProMax to determine benzene concentration in their recent 2022 annual report, which according to § 63.773(d)(3)(i)(H)(1), shall only be used when determining continuous monitoring systems for control devices tested under § 63.772(h). Targa does not use any control device to control emissions from the dehydration unit. As specified in § 63.772(b)(2)(i), the determination of actual average benzene or BTEX emissions from a glycol dehydration unit shall be made using the model GRI-GLYCalc™, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc™ Technical Reference Manual.

D. Recordkeeping Requirements [40 CFR 63.774]

1. The recordkeeping provisions of 40 CFR part 63, subpart A, that apply and those that do not apply to the Permittee are listed in Table 2 of 40 CFR part 63, subpart HH.
2. For glycol dehydration units operating at the source that meet the exemption criteria in §63.764(e)(1)(i) or §63.764(e)(1)(ii), the Permittee shall maintain records as specified in §63.774(d).
3. The Permittee shall maintain records, pursuant to §63.774(g), of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment) or the air pollution control equipment and monitoring equipment. The Permittee shall maintain records of actions taken during periods of malfunction to minimize emissions in accordance with §63.764(j), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

Area of Concern: As specified in § 63.774(d)(1)(ii), An owner or operator of a glycol dehydration unit that meets the exemption criteria in § 63.764(e)(1)(i) or § 63.764(e)(1)(ii) shall maintain the records specified in...paragraph (d)(1)(ii) of this section, as appropriate, for that glycol dehydration unit: The actual average benzene emissions (in terms of benzene emissions per year) as determined in accordance with § 63.772(b)(2).

It cannot be determined if Targa is complying with the requirement to maintain actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere are less than 0.90 megagram per year. Targa used ProMax to determine benzene concentration in their recent 2022 annual report, which according to § 63.773(d)(3)(i)(H)(1), shall only be used when determining continuous monitoring systems for control devices tested under § 63.772(h). Targa does not use any control device to control emissions from the dehydration unit. As specified in § 63.772(b)(2)(i), the determination of actual average benzene or BTEX emissions from a glycol dehydration unit shall be made using the model GRI-GLYCalc™, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc™ Technical Reference Manual.

E. Reporting Requirements [40 CFR 63.775]

1. The reporting provisions of 40 CFR part 63, subpart A, that apply and those that do not apply to the Permittee are listed in Table 2 of this subpart.
2. The Permittee shall submit Notification of Compliance Status Reports as specified in §63.775(d).
3. The Permittee shall submit notifications of process changes as specified in §63.775(f).

OBSERVATION: No reports are required for area sources that are located at any UA plus offset and UC boundaries unless Targa initiated a process change under § 63.775(g).

V. National Emission Standards for Hazardous Air Pollutants from Reciprocating Internal Combustion Engines - 40 CFR Part 63, Subpart ZZZZ

A. Applicability [40 CFR 63.6585]

40 CFR part 63, subpart ZZZZ applies to the following emission units:

1. Caterpillar engine identified as Emissions Unit EU 1 in Table 2 of this permit;
2. Waukesha F3514GSI engine identified as Emission Unit EU 2 in Table 2 of this permit;
3. Caterpillar engine identified as Emissions Unit EU 18 in Table 2 of this permit; and
4. Waukesha L5794GSI engine identified as Emission Unit EU 33 in Table 2 of this permit.

OBSERVATION: EU 1, EU 18 and EU 33 meet the requirements of MACT ZZZZ by meeting the requirements for NSPS JJJJ. No further requirements under MACT ZZZZ apply. Note: EU 1 is a gap engine.

Engine EU 2 commenced construction before June 12, 2006 and meets the definition of remote stationary 4SRB natural gas-fired RICE, therefore, emissions unit EU 2 is subject to the area source requirements of MACT ZZZZ.

B. General Provisions [40 CFR 63.6665]

1. The General Provisions at 40 CFR part 63, subpart A apply as specified in Table 8 of 40 CFR part 63, subpart ZZZZ. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR part 63, subpart A.
2. All reports required under 40 CFR part 63, subpart A shall be sent to the EPA at the following address as listed in §63.13:

U.S. Environmental Protection Agency, Region 8
Enforcement and Compliance Assurance Division
Chief, Air Enforcement Branch, 8ENF-AT
1595 Wynkoop Street
Denver, Colorado 80202-1129

C. Requirements for Engines EU 1, EU 18 and EU 33 [40 CFR 63.6590(c)(4)]

For engines EU 1, EU 18 and EU 33, the Permittee shall meet the requirements of 40 CFR part 63, subpart ZZZZ by meeting the requirements of 40 CFR part 60, subpart JJJJ, for stationary SI engines. No further requirements apply to emissions units EU 1, EU 18 or EU 33 under 40 CFR part 63. The applicable requirements of 40 CFR part 60, subpart JJJJ are specified in Section II of this permit.

[Explanatory Note: Engine EU 1 is considered new RICE because of the construction date and must meet the requirements of MACT ZZZZ by meeting the requirements of 40 CFR part 60, subpart JJJJ; however, EU 1 was manufactured prior to January 1, 2008 and therefore, is not subject to any requirements of subpart JJJJ.]

Engine EU 1, therefore is not identified in Section II of this permit as being subject to the requirements of subpart JJJJ as of the issuance of this Permit.]

OBSERVATION: EU 1, EU 18 and EU 33 meet the requirements of MACT ZZZZ by meeting the requirements for NSPS JJJJ. No further requirements under MACT ZZZZ apply. Note: EU 1 is a gap engine.

D. Emission and Operating Limitations for EU 2 [40 CFR 63.6603(a) and (f)]

1. Emissions from engine unit EU 2 shall meet the following operating requirements according to Table 2d for Non-emergency, non-black start 4SRB remote stationary RICE greater than 500 hp to 40 CFR part 63, subpart ZZZZ:
 - (a) Change oil and filter every 2,160 hours of operation or annually, whichever comes first;
 - (b) Inspect spark plugs every 2,160 hours of operation or annually, and replace as necessary;
 - (c) Inspect all hoses and belts every 2,160 hours of operation or annually, whichever comes first, and replaces as necessary; and
 - (d) Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.
2. Evaluate the status of EU 2 every 12 months that the engine meets the definition of remote stationary RICE according to §63.6603(f). If the evaluation indicates that the stationary RICE no longer meets the definition of remote stationary RICE in §63.6675 of this subpart, the owner or operator must comply with the requirements for existing non-emergency SI 4SRB stationary RICE with a site rating of more than 500 hp located at area sources of HAP that are not remote stationary RICE within 1 year of the evaluation.

OBSERVATION: Targa provided work orders documenting the operating requirements, oil and filter changes, and engine inspections for all engines at Clarks Creek dating back through January 1, 2021. EPA would advise Targa to contain more information in the work orders to ensure operating requirements are being met. Certain work orders reviewed do not contain information regarding engine operating hours or type of maintenance conducted. For example, work order 260107 for Unit 3 does not describe the specific engine at Clarks Creek, nor does it contain the engine operating hours at the time of the 2160 hr maintenance or the specific maintenance conducted.

E. General Compliance Requirements for EU 2 [40 CFR 63.6605(a) and (b)]

At 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, and be in compliance with the emission limitations, operating limitations and other requirements in this subpart that apply. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the EPA which may include but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

OBSERVATION: Targa provided work orders documenting the operating requirements, oil and filter changes, and engine inspections for all engines at Clarks Creek dating back through January 1, 2021.

F. Continuous Compliance Requirements for EU 2 [40 CFR 63.6640(a), and Table 6]

1. The Permittee, as the owner and operator of an existing non-emergency 4SLB and 4SRB stationary RICE greater than 500 hp located at an area source of HAP that is remote stationary RICE, shall demonstrate continuous compliance with each emission limitation, operating limitation and other requirements in Table 2d to this subpart that apply according to the either of following work or management practices as specified in Table 6, section 9:
 - (a) Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or
 - (b) Develop and follow a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

OBSERVATION: Targa appears to follow the MACT ZZZZ operating and maintenance procedures for site specific maintenance every 2,160 hours of operating. EPA would advise Targa to contain more information in the work orders to ensure operating requirements are being met. Certain work orders reviewed do not contain information regarding engine operating hours or type of maintenance conducted. For example, work order 260107 for Unit 3 does not describe the specific engine at Clarks Creek, nor does it contain the engine operating hours at the time of the 2160 hr maintenance or the specific maintenance conducted.

G. Notifications, Reports and Records [40 CFR 63.6645, 63.6650, 63.6655, 63.6660]

1. The Permittee must submit notifications as specified in §63.6645.
2. The Permittee must submit reports as specified in §63.6650.
3. The Permittee must keep records as specified in §63.6655.
4. The Permittee must keep the records in the format and for the duration as specified in §63.6660.

OBSERVATION: Targa submitted records regarding maintenance on the engines at Clarks Creek upon request.

VI. Facility-Wide Requirements [40 CFR 71.6(a)(1)]

Conditions in this section of this permit apply to all emissions units located at the source, including any units not specifically listed in Table 2 of the Facility Emission Points section of this permit.

A. Recordkeeping Requirements [40 CFR 71.6(a)(3)(ii)]

The Permittee shall comply with the following generally applicable recordkeeping requirements:

1. If the Permittee determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more HAP is not subject to a relevant standard or other requirement established under 40 CFR part 63, the Permittee shall keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination shall include an analysis (or other information) that demonstrates why the Permittee believes the source is unaffected (e.g., because the source is an area source). [40 CFR 63.10(b)(3)]

2. Records shall be kept of off permit changes, as required by the Off Permit Changes section of this permit.

OBSERVATION: Records requested from EPA inspectors were provided by Targa on July 14, 2023.

B. Reporting Requirements [40 CFR 71.6(a)(3)(iii)]

1. The Permittee shall submit to the EPA all reports of any required monitoring under this permit semiannually. The first report shall cover the period from the effective date of this permit through December 31, 2019. Thereafter, the report shall be submitted semi-annually, by April 1st and October 1st of each year. The report due on April 1st shall cover the 6-month period ending on the last day of December before the report is due. The report due on October 1st shall cover the 6-month period ending on the last day of June before the report is due. All instances of deviations from permit requirements shall be clearly identified in such reports. All required reports shall be certified by a responsible official consistent with the Submissions section of this permit.

*[To help Part 71 Permittees meet reporting responsibilities, the EPA has developed a form "SIXMON" for 6-month monitoring reports. The form may be found on the EPA's website at:
<https://www.epa.gov/title-v-operating-permits/epa-issued-operating-permits>]*

2. "Deviation" means any situation in which an emissions unit fails to meet a permit term or condition. A deviation is not always a violation. A deviation can be determined by observation or through review of data obtained from any testing, monitoring, or recordkeeping established in accordance with §71.6(a)(3)(i) and (a)(3)(ii). For a situation lasting more than 24 hours which constitutes a deviation, each 24-hour period is considered a separate deviation. Included in the meaning of deviation are any of the following:
 - (a) A situation where emissions exceed an emission limitation or standard;
 - (b) A situation where process or emissions control device parameter values indicate that an emission limitation or standard has not been met; or
 - (c) A situation in which observations or data collected demonstrate noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit.
3. The Permittee shall promptly report to the EPA deviations from permit requirements, including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. "Prompt" is defined as follows:
 - (a) Any definition of "prompt" or a specific time frame for reporting deviations provided in an underlying applicable requirement as identified in this permit.
 - (b) Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations will be submitted based on the following schedule:
 - (i) For emissions of a HAP or a toxic air pollutant (as identified in the applicable regulation) that continue for more than 1 hour in excess of permit requirements, the report shall be made within 24 hours of the occurrence.
 - (ii) For emissions of any regulated air pollutant, excluding a HAP or a toxic air pollutant that continues for more than two (2) hours in excess of permit requirements, the report shall be made within 48 hours.
 - (iii) For all other deviations from permit requirements, the report shall be submitted with the semi-annual monitoring report.
 - (c) If any of the conditions in (i) or (ii) of paragraph (b) above are met, the Permittee shall notify the

EPA by telephone (1-800-227-6312), facsimile (303-312-6409), or by email to r8airreportenforcement@epa.gov based on the timetables listed above. *[Notification shall specify that this notification is a deviation report for a Part 71 permit]*. A written notice, certified consistent with the Submissions section of this permit shall be submitted within 10 working days of the occurrence. All deviations reported under this section shall also be identified in the 6-month report required under Condition 1 in this section of this permit.

[Explanatory note: To help Part 71 Permittees meet reporting responsibilities, the EPA has developed a form “PDR” for prompt deviation reporting. The form may be found on the EPA’s website at: <https://www.epa.gov/title-v-operating-permits/epa-issued-operating-permits>]

OBSERVATION: Targa submits forms according to this permit requirement. See Table 6 below for TVACC and SIXMON reports which includes deviations.

VII. General Provisions

A. Annual Fee Payment [40 CFR 71.9]

1. The Permittee shall pay an annual permit fee in accordance with the procedures outlined below.
2. The Permittee shall pay the annual permit fee each year no later than April 1st. The fee shall cover the previous calendar year.
3. The fee payment shall be in United States currency and shall be paid by money order, bank draft, certified check, corporate check, or electronic funds transfer payable to the order of the U.S. Environmental Protection Agency.
4. The Permittee shall send fee payment and a completed fee filing form to:

For regular U.S. Postal Service mail
(FedEx, Airborne, DHL, and UPS)

U.S. Environmental Protection Agency
FOIA and Miscellaneous Payments
Cincinnati Finance Center
P.O. Box 979078
St. Louis, Missouri 63197-9000

For non-U.S. Postal Service express mail

U.S. Bank
Government Lockbox 979078
U.S. EPA FOIA & Misc. Payments
1005 Convention Plaza SL-MO-C2-GL
St. Louis, Missouri 63101

5. The Permittee shall send an updated fee calculation worksheet form and a photocopy of each fee payment check (or other confirmation of actual fee paid) submitted annually by the same deadline as required for fee payment to the address listed in the Submissions section of this permit.

[Explanatory note: The fee filing form “FF” and the fee calculation worksheet form “FEE” may be found on the EPA’s website at: <https://www.epa.gov/title-v-operating-permits/epa-issued-operating-permits>]

6. Basis for calculating annual fee:
 - (a) The annual emissions fee shall be calculated by multiplying the total tons of actual emissions of all “regulated pollutants (for fee calculation)” emitted from the source by the presumptive emissions fee (in dollars per ton) in effect at the time of calculation.
 - (i) “Actual emissions” means the actual rate of emissions in tpy of any regulated pollutant (for fee calculation) emitted from a Part 71 source over the preceding calendar year.

Actual emissions shall be calculated using each emissions unit's actual operating hours, production rates, in-place control equipment, and types of materials processed, stored, or combusted during the preceding calendar year.

- (ii) Actual emissions shall be computed using methods required by the permit for determining compliance, such as monitoring or source testing data.
- (iii) If actual emissions cannot be determined using the compliance methods in the permit, the Permittee shall use other federally recognized procedures.

[Explanatory note: The presumptive fee amount is revised each calendar year to account for inflation, and it is available from the EPA prior to the start of each calendar year.]

- (b) The annual emissions fee shall be increased by a GHG fee adjustment for any source that has initiated an activity listed in table at §71.9(c)(8) since the fee was last paid. The GHG fee adjustment shall be equal to the set fee provided in the table at §71.9(c)(8) for each activity that has been initiated since the fee was last paid.
- (c) The Permittee shall exclude the following emissions from the calculation of fees:
 - (i) The amount of actual emissions of each regulated pollutant (for fee calculation) that the source emits in excess of 4,000 tpy;
 - (ii) Actual emissions of any regulated pollutant (for fee calculation) already included in the fee calculation; and
 - (iii) The quantity of actual emissions (for fee calculation) of insignificant activities [defined in 40 CFR 71.5(c)(11)(i)] or of insignificant emissions levels from emissions at the source identified in the Permittee's application pursuant to 40 CFR 71.5(c)(11)(ii).

- 7. Fee calculation worksheets shall be certified as to truth, accuracy, and completeness by a responsible official.

[Explanatory note: The fee calculation worksheet form already incorporates a section to help you meet this responsibility.]

- 8. The Permittee shall retain fee calculation worksheets and other emissions-related data used to determine fee payment for 5 years following submittal of fee payment. [Emission-related data include, for example, emissions-related forms provided by the EPA and used by the Permittee for fee calculation purposes, emissions-related spreadsheets, and emissions-related data, such as records of emissions monitoring data and related support information required to be kept in accordance with 40 CFR 71.6(a)(3)(ii).]
- 9. Failure of the Permittee to pay fees in a timely manner shall subject the Permittee to assessment of penalties and interest in accordance with 40 CFR 71.9(l).
- 10. When notified by the EPA of underpayment of fees, the Permittee shall remit full payment within 30 days of receipt of notification.
- 11. A Permittee who thinks an EPA-assessed fee is in error and who wishes to challenge such fee, shall provide a written explanation of the alleged error to the EPA along with full payment of the EPA assessed fee.

OBSERVATION: The following annual emissions reports and annual fees have been submitted prior to April 1 each year as required for Clarks Creek. See Table 5 below.

Table 5: Fee year and annual actual emissions

Fee Year	NO _x	VOC	SO ₂	PM ₁₀	HAP Total	Fee Paid
2020	122.7	141.0	0.1	1.4	13.7	\$14,479.92
2021	18.2	52.8	0.06	0.02	10.6	\$4,593.99
2022	110.39	92.47	0.06	1.38	5.73	\$12,719.42

B. Annual Emissions Inventory [40 CFR 71.9(h)(1) and (2)]

1. The Permittee shall submit an annual emissions report of its actual emissions for both criteria pollutants and regulated HAP for this source for the preceding calendar year for fee assessment purposes. The annual emissions report shall be certified by a responsible official and shall be submitted each year to the EPA by April 1st.
2. The annual emissions report shall be submitted to the EPA at the address listed in the Submissions section of this permit.

[Explanatory note: An annual emissions report, required at the same time as the fee calculation worksheet by 40 CFR 71.9(h), has been incorporated into the fee calculation worksheet form as a convenience.]

OBSERVATION: See Table 5 above. Targa submits an actual emissions inventory along with annual Title V fees.

C. Compliance Requirements [40 CFR 71.6(a)(6), section 113(a) and 113(e)(1) of the CAA, and 40 CFR 51.212, 52.12, 52.33, 60.11(g), 61.12]

1. Compliance with the Permit
 - (a) The Permittee must comply with all conditions of this Part 71 permit. Any permit noncompliance constitutes a violation of the CAA and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
 - (b) It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
 - (c) For the purpose of submitting compliance certifications in accordance with §71.6(c)(5), or establishing whether or not a person has violated or is in violation of any requirement of this permit, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.
2. Compliance Schedule [40 CFR 71.5(c)(8)(iii)]
 - (a) For applicable requirements with which the source is in compliance, the source will continue to comply with such requirements.
 - (b) For applicable requirements that will become effective during the permit term, the source shall meet such requirements on a timely basis.
3. Compliance Certifications [40 CFR 71.6(c)(5)]

- (a) The Permittee shall submit to the EPA a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices annually by April 1st, and shall cover the same 12-month period as the two consecutive semi-annual monitoring reports.

[Explanatory note: To help Part 71 Permittees meet reporting responsibilities, the EPA has developed a reporting form for annual compliance certifications. The form may be found on the EPA's website at: <https://www.epa.gov/title-v-operating-permits/epa-issued-operating-permits/>]

- (b) The compliance certification shall be certified as to truth, accuracy, and completeness by a responsible official consistent with 40 CFR 71.5(d).
- (c) The certification shall include the following:
- (i) Identification of each permit term or condition that is the basis of the certification;
 - (ii) The identification of the method(s) or other means used for determining the compliance status of each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required in this permit. If necessary, the Permittee also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the CAA, which prohibits knowingly making a false certification or omitting material information;
 - (iii) The status of compliance with each term and condition of the permit for the period covered by the certification based on the method or means designated in (ii) above. The certification shall identify each deviation and take it into account in the compliance certification;
 - (iv) Such other facts as the EPA may require to determine the compliance status of the source; and
 - (v) Whether compliance with each permit term was continuous or intermittent.

OBSERVATION: TVACC AND SIXMON reports are provided below in Table 6.

Table 6: Targa Clarks Creek SIXMON and TVACC reports

Sent	Report Type	Reporting Period	Deviations
9/24/2021	SIXMON	1/1/21-7/1/21	None reported
1/21/2022	SIXMON	7/1/21-12/31/21	Targa notes EU 18 rod packing changeout was beyond the 3 year/26,000 hour limit per requirements in 40 CFR 60.5385a(1) and (2). Deviation start 10/14/2021. Deviation end: 12/16/2021. 2 months and 2 days of reported deviation. Probable cause of deviation was noted by Targa as promptness of actions was lacking and freight delays with shipments. Additional training implemented and new electronic scheduling and work order system.
1/21/2022	TVACC	1/1/21-12/31/21	Deviation from SIXMON (7/1/21-12/31/2021) included in TVACC.
7/22/2022	SIXMON	1/1/22-6/30/22	None reported
3/1/2023	SIXMON	7/1/22-12/31/22	None reported
3/1/2023	TVACC	1/1/22-12/31/22	None reported

D. Duty to Provide and Supplement Information [40 CFR 71.6(a)(6)(v), 71.5(a)(3), and 71.5(b)]

1. The Permittee shall furnish to the EPA, within a reasonable time, any information that the EPA may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the EPA copies of records that are required to be kept pursuant to the terms of the permit, including information claimed to be confidential. Information claimed to be confidential must be accompanied by a claim of confidentiality according to the provisions of 40 CFR part 2, subpart B.
2. The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information. In addition, a Permittee shall provide additional information as necessary to address any requirements that become applicable after the date a complete application is filed, but prior to release of a draft permit.

OBSERVATION: Targa provided information to EPA inspectors upon request both during the onsite inspection and during records review.

E. Submissions [40 CFR 71.5(d), 71.6(c)(1) and 71.9(h)(2)]

1. Any document (application form, report, compliance certification, etc.) required to be submitted under this permit shall be certified by a responsible official as to truth, accuracy, and completeness. Such certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

[Explanatory note: the EPA has developed a reporting form “CTAC” for certifying truth, accuracy and completeness of Part 71 submissions. The form may be found on the EPA’s website at: <https://www.epa.gov/title-v-operating-permits/epa-issued-operating-permits>]

All fee calculation worksheets and applications for renewals and permit modifications shall be submitted to:

U.S. Environmental Protection Agency, Region 8
Part 71 Permit Contact, Air and Radiation Division, 8ARD-PM
1595 Wynkoop Street
Denver, Colorado 80202

2. Except where otherwise specified, all reports, test data, monitoring data, notifications, and compliance certifications shall be submitted to:

U.S. Environmental Protection Agency, Region 8
Enforcement and Compliance Assurance Division
Chief, Air and Toxics Enforcement Branch, 8ENF-AT
1595 Wynkoop Street
Denver, Colorado 80202-1129

OBSERVATION: Targa submits reports as required by the provisions of this permit.

F. Severability Clause [40 CFR 71.6(a)(5)]

The provisions of this permit are severable, and in the event of any challenge to any portion of this permit, or if any portion is held invalid, the remaining permit conditions shall remain valid and in force.

G. Permit Actions [40 CFR 71.6(a)(6)(iii)]

This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

H. Administrative Permit Amendments [40 CFR 71.7(d)]

The Permittee may request the use of administrative permit amendment procedures for a permit revision that:

1. Corrects typographical errors;
2. Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
3. Requires more frequent monitoring or reporting by the Permittee;
4. Allows for a change in ownership or operational control of a source where the EPA determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittee has been submitted to the EPA;
5. Incorporates into the Part 71 permit the requirements from preconstruction review permits authorized under an EPA-approved program, provided that such a program meets procedural requirements substantially equivalent to the requirements of 40 CFR 71.7 and 71.8 that would be applicable to the change if it were subject to review as a permit modification, and compliance requirements substantially equivalent to those contained in 40 CFR 71.6; or
6. Incorporates any other type of change which the EPA has determined to be similar to those listed in (1) through (5) above.

[Note to Permittee: If 1 through 5 above do not apply, please contact the EPA for a determination of similarity prior to submitting your request for an administrative permit amendment under this provision.]

OBSERVATION: No administrative permit amendments were requested since the previous inspection.

I. Minor Permit Modifications [40 CFR 71.7(e)(1)]

1. The Permittee may request the use of minor permit modification procedures only for those modifications that:
 - (a) Do not violate any applicable requirement;
 - (b) Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
 - (c) Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
 - (d) Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:

- (i) A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I; and
 - (ii) An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the CAA;
 - (e) Are not modifications under any provision of Title I of the CAA; and
 - (f) Are not required to be processed as a significant modification.
2. Notwithstanding the list of changes ineligible for minor permit modification procedures in 1 above, minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in an applicable implementation plan or in applicable requirements promulgated by the EPA.
 3. An application requesting the use of minor permit modification procedures shall meet the requirements of 40 CFR 71.5(c) and shall include the following:
 - (a) A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
 - (b) The source's suggested draft permit;
 - (c) Certification by a responsible official, consistent with 40 CFR 71.5(d), that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
 - (d) Completed forms for the permitting authority to use to notify affected states as required under 40 CFR 71.8.
 4. The source may make the change proposed in its minor permit modification application immediately after it files such application. After the source makes the change allowed by the preceding sentence, and until the permitting authority takes any of the actions authorized by 40 CFR 71.7(e)(1)(iv)(A) through (C), the source must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time period, the source need not comply with the existing permit terms and conditions it seeks to modify. However, if the source fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it.
 5. The permit shield under 40 CFR 71.6(f) may not extend to minor permit modifications.

OBSERVATION: No minor permit modifications were requested since the previous inspection.

J. Significant Permit Modifications [40 CFR 71.7(e)(3), 71.8(d), and 71.5(a)(2)]

1. The Permittee must request the use of significant permit modification procedures for those modifications that:
 - (a) Do not qualify as minor permit modifications or as administrative amendments;
 - (b) Are significant changes in existing monitoring permit terms or conditions; or

- (c) Are relaxations of reporting or recordkeeping permit terms or conditions.
- 2. Nothing herein shall be construed to preclude the Permittee from making changes consistent with Part 71 that would render existing permit compliance terms and conditions irrelevant.
- 3. Permittees must meet all requirements of Part 71 for applications, public participation, and review by affected states and tribes for significant permit modifications. For the application to be determined complete, the Permittee must supply all information that is required by 40 CFR 71.5(c) for permit issuance and renewal, but only that information that is related to the proposed change.

OBSERVATION: No significant permit modifications were requested since the previous inspection.

K. Reopening for Cause [40 CFR 71.7(f)]

The permit may be reopened and revised prior to expiration under any of the following circumstances:

- 1. Additional applicable requirements under the CAA become applicable to a major Part 71 source with a remaining permit term of three or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to 40 CFR 71.7(c)(3);
- 2. Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the EPA, excess emissions offset plans shall be deemed to be incorporated into the permit;
- 3. The EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
- 4. The EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

L. Property Rights [40 CFR 71.6(a)(6)(iv)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

M. Inspection and Entry [40 CFR 71.6(c)(2)]

- 1. Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow the EPA or an authorized representative to perform the following:
 - (a) Enter upon the Permittee's premises where a Part 71 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
 - (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
 - (c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
 - (d) As authorized by the CAA, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

N. Transfer of Ownership or Operation [40 CFR 71.7(d)(1)(iv)]

A change in ownership or operational control of this source may be treated as an administrative permit amendment if the EPA determines no other change in this permit is necessary and provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittee has been submitted to the EPA.

O. Off Permit Changes [40 CFR 71.6(a)(12) and 40 CFR 71.6(a)(3)(ii)]

The Permittee is allowed to make certain changes without a permit revision, provided that the following requirements are met, and that all records required by this section are kept for a period of 5 years:

1. Each change is not addressed or prohibited by this permit;
2. Each change shall meet with all applicable requirements and shall not violate any existing permit term or condition;
3. Changes under this provision may not include changes subject to any requirement of 40 CFR parts 72 through 78 or modifications under any provision of Title I of the CAA;
4. The Permittee must provide contemporaneous written notice to the EPA of each change, except for changes that qualify as insignificant activities under 40 CFR 71.5(c)(11). The written notice must describe each change, the date of the change, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change;
5. The permit shield does not apply to changes made under this provision;
6. The Permittee must keep a record describing all changes that result in emissions of any regulated air pollutant subject to any applicable requirement not otherwise regulated under this permit, and the emissions resulting from those changes;
7. The notice shall be kept on site and made available to the EPA on request, in accordance with the general recordkeeping provision of this permit; and
8. Submittal of the written notice required above shall not constitute a waiver, exemption, or shield from applicability of any applicable standard or PSD permitting requirements under 40 CFR 52.21 that would be triggered by the change.

P. Permit Expiration and Renewal [40 CFR 71.5(a)(1)(iii), 71.5(a)(2), 71.5(c)(5), 71.6(a)(11), 71.7(b), 71.7(c)(1), and 71.7(c)(3)]

1. This permit shall expire upon the earlier occurrence of the following events:
 - (a) Five (5) years elapse from the date of issuance; or
 - (b) The source is issued a Part 70 or Part 71 permit under an EPA-approved or delegated permit program.
2. Expiration of this permit terminates the Permittee's right to operate unless a timely and complete permit renewal application has been submitted at least 6 months but not more than 18 months prior to the date of expiration of this permit.
3. If the Permittee submits a timely and complete permit application for renewal, consistent with 40 CFR

71.5(a)(2), but the EPA has failed to issue or deny the renewal permit, then all the terms and conditions of the permit, including any permit shield granted pursuant to 40 CFR 71.6(f) shall remain in effect until the renewal permit has been issued or denied.

4. The Permittee's failure to have a Part 71 permit is not a violation of this part until the EPA takes final action on the permit renewal application. This protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit any additional information identified as being needed to process the application by the deadline specified in writing by the EPA.
5. Renewal of this permit is subject to the same procedural requirements that apply to initial permit issuance, including those for public participation, affected state, and tribal review.
6. The application for renewal shall include the current permit number, description of permit revisions and off permit changes that occurred during the permit term, any applicable requirements that were promulgated and not incorporated into the permit during the permit term, and other information required by the application form.

APPENDIX A: Site Overview



APPENDIX B: Photo Log

File Name	Description	Photographer
MOV_3307	ECD Emissions	