

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

Inspection Date: June 15, 2023

Inspection Report Date: August 1, 2023

EPA Representatives: Colin LeCortz, Environmental Scientist, US EPA Region 8
Bob Gallagher, Environmental Scientist, US EPA Region 8
Phil Meyers, EPA Inspector, US EPA NEIC
Griffith Brown, US EPA Region 6

Tribal Representatives: None

Company Representatives: Mitchell Anderson
Adam Moore

Inspection Report Prepared By: Colin LeCortz, Environmental Scientist, US EPA Region 8

Inspection Report Reviewed By: Scott Patefield, Manager, Enforcement and Compliance Assurance
Division, Air and Toxics Enforcement Branch SCOTT
PATEFIELD

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, Reconstruction or Modification Commenced After August 23, 2011 and on or before September 18, 2015 (NSPS OOOO)
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)

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Date: 2023.08.14 14:08:57 -06'00'

Permit Number: V-TAT-000670-2015.00
Replaces Permit No.: NA

Issue Date: December 30, 2019
Effective Date: December 30, 2019
Expiration Date: December 30, 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: Mitchell Anderson, Senior Environmental Specialist
(701) 842-3315
Facility Operator & Name: Targa – Junction Compressor Station (Junction)
Facility Location: Latitude 47.77241, Longitude -102.72766
County, State: McKenzie County, North Dakota
Reservation: Fort Berthold Indian Reservation
Tribe: Three Affiliated Tribes
Responsible Official: Dwayne Burks, VP Operations
SIC Code: 1311 – Crude Petroleum and Natural Gas
AFS ID: 38-053-00002
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 perform 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 performance 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. Targa conducts NSPS OOOOa fugitive emission surveys at Junction according to information provided by Targa during the records review. EPA does not have records for why Junction is subject to NSPS OOOOa or what construction, modification or reconstruction occurred at the facility to make NSPS OOOOa an applicable regulation. More follow-up will be required regarding the applicability of NSPS OOOOa at Junction. As noted for NSPS OOOOa purposes, EPA inspectors observed emissions coming from the inlet separator (MOV_0315.jpg) and a water removal vessel/water separator tower after the inlet separator (MOV_0316.jpg).
2. Targa provided a ProMax glycol circulation rate during the records review which accounted for a glycol circulation rate of 0.45 gpm. Which is less than the 0.532 gpm noted while onsite by EPA inspectors. Targa is required to maintain the optimum glycol circulation rate and submit determination in accordance with MACT HH and the permit conditions above if there is a change to the optimum glycol circulation rate using GLYCalc.
3. EPA has numerous concerns regarding the engine compliance with MACT ZZZZ. Specifically for reporting deviations and CPMS operations. See the MACT ZZZZ section below.

Compliance Assistance

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

Description of Operations¹

Junction Compressor Station (Junction) 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 (Emissions Units EU 16 and EU 22 in Table 2 below) and two produced water storage tanks (Emissions Units EU 11 and EU 23 in Table 2 below). Vapor emissions from the storage tanks are routed to an enclosed combustor (Emissions Unit EU 27 in Table 2 below) 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 19 in Table 2 below) which compresses the gas before the gas stream is split before it enters either of the two triethylene glycol (TEG) dehydration unit (Emissions Unit EU 7 and EU 21 in Table 2 below). The following describes the process of each of the TEG dehydration units: the compressed natural gas enters a dehydration unit 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 both flash tanks are routed back to the separator. The depressurized TEG is routed to and regenerated using heat in a vessel called a TEG reboiler. Methanol is injected at different points to the rich TEG to prevent hydrates from forming. Pneumatic pumps that control the injection rate are powered by instrument air. The vapors from both reboilers are vented to the atmosphere. The regenerated lean TEG is circulated back to the contactor.

General Inspection Observations and Commentary

¹ The description of operations provided here is a modified excerpt from the process description from the Title V Permit, V-TAT-000670-2015.00.

EPA representatives Colin LeCortz, Bob Gallagher, Griffith Brown and Phil Myers, met with Targa representatives at Junction Compressor Station (Junction) operated by Targa at 11:12 AM on June 15, 2023. At the first facility inspected on June 15, 2023 (see Clarks Creek inspection report), Targa discussed 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 for the entire day's inspections. No hot work permit was required. EPA inspector Mr. LeCortz informed Targa representatives that the environmental manager would receive lists of questions to assist in the records review portion regarding the operations at Junction.

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

1. One of the two TEG dehydration units was visually confirmed off. Targa representatives confirmed this was the larger, 12 MMscfd dehydration unit (EU 7 with EU 4 Reboiler in Table 2 below). EU 21, with EU 20 Reboiler was operating.
2. At this facility, Junction, Mitch discussed that there are monthly checks performed by a contractor who reviews the pressure drop (dP) of the engine catalyst monitoring and he receives a report each day of catalyst operating temperatures.
3. The facility has 4 tanks: 2 NGL and 2 produced water. The NGL has one truck loadout per week, produced water is trucked out once per month.
4. Engine EU 19 was removed from the facility.

The following observations were taken during the facility walkthrough:

1. The enclosed combustion device (ECD), Tripoint serial number: 82069, was confirmed on and operating. No emissions appeared to be venting when viewed by IR. All burners were lit in the array.
2. No storage vessel emissions were detected from the tanks or closed-vent system that routed tank emissions to the ECD.
3. EPA inspectors observed emissions coming from the inlet separator (MOV_0315.jpg) and a water removal vessel/water separator tower after the inlet separator (MOV_0316.jpg).
4. EPA inspectors observed pressure and temperature sensor connections from the engine catalysts that did not appear to be coupled to any monitoring system. They sensor connections appeared to be hanging from the engine catalysts near ground level underneath the engine exhaust piping.
5. The dehydration unit glycol pump, model Kimray 9020PV, was counted to pump at approximately 14 strokes per minute. Emissions from the dehydration unit reboiler are routed to a tank that vents emissions to the atmosphere. The GLYCalc model performed in the May 24, 2019 Title V application used 1.49 gpm in the model run shown below. According to information provided below from Kimray, the Kimray 9020PV has an approximate stroke rate of 0.038 gallons per stroke. Therefore, 14 strokes per minute equates roughly 0.532 gpm. Targa provided a ProMax glycol circulation rate during the records review which accounted for a glycol circulation rate of 0.45 gpm. Which is less than the 0.532 gpm noted while onsite by EPA inspectors.

6. 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 H2O)	Engine Load (%)	Operating hours
ENG 3, EU-18	January, 2006	Model: L5774LT ESM SN:C-16315/1	Not monitored by Targa	Not monitored by Targa	Not monitored by Targa	72	49072
ENG 1, EU-1	Manufacture info illegible	Manufacture info illegible	1121	Not monitored by Targa	Not monitored by Targa	71	71368
ENG 2,	Manufacture	Manufacture	1115	Not	Not	No load	63470

EU-2	info illegible	info illegible		monitored by Targa	monitored by Targa	available	
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* 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.

During the records review, engine temperature recorded onsite from the ECU’s did not match the catalyst temperatures reported by Targa. The Pre-Cat Temp’s were approximately 400°F higher than records provided via excel file from Targa.

EPA and Targa representative met for a closing conference. At the first facility inspected on June 15, 2023 (see Clarks Creek inspection report) a confidential business information (CBI) warning was presented to EOG representatives, and no CBI was claimed, for the entirety of the day’s inspections. During the on-site closing conference, Mr. LeCortz discussed the inlet seperator leaks, engine monitoring parameters as an area of concern and that Mr. LeCortz 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 taken for each inspection that occurred on June 15, 2023 will be provided by EPA NEIC at a later date.

EPA staff departed the facility at 11:45 AM. An email to request relevant compliance-related information and records was sent to Mr. Anderson prior to the onsite inspection on June 13, 2023. Mr. Anderson 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 Junction

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_{2.5}* (tons/yr)	CO* (tons/yr)	CO₂e* (tons/yr)	CH₂O (tons/yr)	HAP* (tons/yr)
EU 1 ^a	20.95	3.70	0.02	0.35	18.86	-	1.20	1.33
EU 2 ^a	12.46	3.02	0.02	0.28	17.44	-	0.90	XX
EU 3	-	-	-	-	-	-	-	-
EU 4	0.06	<0.01	<0.01	0.01	0.05	72.43	<0.01	<0.01
EU 5	0.15	<0.01	<0.01	0.01	0.12	-	-	<0.01
EU 6	-	-	-	-	-	-	-	-
EU 7	-	6.99	-	-	-	-	-	1.92
EU 8	-	66.68	-	-	-	3,085.62	-	0.37
EU 9	-	16.66	-	-	-	510.94	-	0.05
EU 10	-	<0.01	-	-	-	-	-	<0.01
EU 11	-	2.10	-	-	-	-	-	<0.01
EU 12	-	0.05	-	-	-	-	-	<0.01
EU 13	-	0.98	-	-	-	-	-	0.02
EU 14	-	2.44	-	-	-	-	-	<0.01
EU 15 ^b	-	25.43	-	-	-	331.26	-	3.98
EU 16 ^c	-	10.00	-	-	-	-	-	0.30
EU 17	-	15.89	-	-	-	-	-	1.21
EU 18 ^a	24.72	9.44	0.03	0.47	1.73	-	1.60	3.10
EU 19 ^a	19.39	3.24	0.02	0.37	20.46	-	1.20	1.20
EU 20	0.07	<0.01	<0.01	<0.01	0.06	-	<0.01	<0.01
EU 21	-	15.86	-	-	-	-	-	1.83
EU 22 ^c	-	10.00	-	-	-	-	-	0.30

EU 23	-	2.10	-	-	-	-	-	0.10
EU 25 ^d	1.92	1.55	0.01	0.20	3.84	-	0.21	0.33
EU 27 ^c	0.08	0.16	<0.1	-	0.41	-	<0.01	0.90
TOTAL*	79.80	170.76	0.13	1.70	62.98	4000.27	5.12	20.31

a. Based on the enforceable emission limits from National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (MACT ZZZZ).

b. Non-HAP emission from fugitives are not included in major source applicability and are therefore omitted from total PTE calculations.

c. Emissions from EU 16, and EU 22 are routed to EU 27 and are based on the applicable enforceable emissions limit from NSPS OOOO. Emissions from EU 27 are those generated by operation of the device.

d. Based on the enforceable emission limit from the Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (NSPS JJJJ).

*NO_x = nitrogen oxide; VOC = volatile organic compounds; SO₂ = sulfur dioxide; PM_{2.5} = particulate matter < 2.5 microns; CO = carbon monoxide; CO_{2e} = carbon dioxide equivalent; HAP = hazardous air pollutants; CH₂O = Formaldehyde; 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.

A. Facility Emission Points

Table 2. Emission Units and Emission Generating Activities

Emissions Unit ID	Description	Control Equipment
EU 1	Caterpillar G3516LE, 8.08 MMBtu/hr*, 1,085 hp*, 4SLB* Natural Gas Compressor Engine: Serial Number: WPT00206 Installed: 4/6/2013 Manufactured: 9/1/2006	Oxidation Catalyst
EU 2	Caterpillar G3512LE, 6.46 MMBtu/hr*, 860 hp*, 4SLB* Natural Gas Compressor Engine: Serial Number: WPP00129 Installed: 4/6/2013 Manufactured: 9/1/2006	Oxidation Catalyst
EU 7	12 MMscfd* TEG Dehydrator- Process Vent Installed: 4/6/2013	None
EU 4	TEG Reboiler, 0.20 MMBtu/hr*	None (IEU*)
EU 5	Tank Heater, 0.50 MMBtu/hr*	None (IEU)
EU 6	Building Heaters	None (IEU)
EU 8	8 Pneumatic Methanol Injection Pumps	None
EU 9	19 Pneumatic Devices (Intermittent Bleed and Low Bleed)	None
EU 10	One 2,000 gallon Methanol Storage Tank	None (IEU)
EU 11	One 400 bbl* Produced Water Storage Tank Installed: 4/6/2013	Vapor Combustor (EU 27) (Control not enforceable)
EU 12	Water Loading Losses	None (IEU)
EU 13	Two 12" Pig Receivers	None (IEU)

EU 14	One 6" Pig Launcher	None
EU 15	Fugitive Emissions	None
EU 16	One 400 bbl* Condensate Storage Tank Installed: 4/6/2013	Vapor Combustor (EU 27)
EU 17	Condensate Loading Losses	None
EU 18	Waukesha L5774LT, 10.69 MMBtu/hr*, 1,280 hp*, 4SLB* Natural Gas Compressor Engine: Serial Number: C-16315/1 Installed: 5/18/2014 Manufactured: 1/1/2006	Oxidation Catalyst
EU 19	Caterpillar G3512LE, 8.36 MMBtu/hr*, 1,004 hp*, 4SLB* Natural Gas Compressor Engine: Serial Number: JNJ00772 Installed: 10/23/2014 Manufactured: 4/1/2001	Oxidation Catalyst
EU 21	8 MMscfd* TEG Dehydrator- Process Vent Installed: 4/6/2013	None
EU 20	Glycol Reboiler, 0.25 MMBtu/hr*	None (IEU)
EU 22	One 400 bbl* Condensate Storage Tank Installed: 4/6/2013	Vapor Combustor (EU 27)
EU 23	One 400 bbl* Produced Water Storage Tank Installed: 4/6/2013	Vapor Combustor (EU 27) (Control not enforceable)
EU 25	NG Engines PSI HD 8.1L Turbo, 2.31 MMBtu/hr*, 199 hp*, 4SRB*, Natural Gas Powered Generator Engine: Serial Number: JNJ00772 Installed: 4/1/2014 Manufactured After 1/1/2011 OBSERVATION: See NSPS JJJJ section below. Like kind replacement occurred and this engine is now a Doosan D8.1LT, SN: EEPOG402088, Manufactured 10/6/2014.	None
EU 27	LEED 60" Vapor Combustor Model Number: EC60-2S Installed: 2018	Control Device

*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; IEU = Insignificant Emission Unit.

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 application, unless otherwise noted.

Table 3: Requirements for Emission Units

Equipment	Applicable Requirements	Limitations	Monitoring	
			Method	Interval
EU 1	MACT ZZZZ	Limit CH ₂ O to 14 ppm @ 15.0% O ₂	Performance test	Semiannually or Annually*

EU 2	MACT ZZZZ	Limit CH ₂ O to 14 ppm @ 15.0% O ₂	Performance test	Semiannually or Annually*
EU 7	MACT HH	Maintain optimum glycol circulation rate	63.654(d)(2)	Continuously maintain optimum glycol circulation rate
EU 4				
EU 5	None	NA	NA	NA
EU 6	None	NA	NA	NA
EU 8	NA	NA	NA	NA
EU 9	NA	NA	NA	NA
EU 10	None	NA	NA	NA
EU 16	NSPS OOOO	Control tank emissions by 95% through EU 27.	60.18	Continuous
		Monthly AVO	Monthly AVO	Monthly
EU 18	MACT ZZZZ	Limit CH ₂ O to 14 ppm @ 15.0% O ₂	Performance test	Semiannually or Annually*
EU 19	NA	NA	NA	NA
EU 21	MACT HH	Maintain optimum glycol circulation rate	63.654(d)(2)	Continuously maintain optimum glycol circulation rate
EU 20				
EU 22	NSPS OOOO	Control tank emissions by 95% through EU 27.	60.18	Continuous
		Monthly AVO	Monthly AVO	Monthly
EU 23	NSPS OOOO	Monthly AVO	Monthly AVO	Monthly
EU 25	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
EU 27	NSPS OOOO	95.0% destruction efficiency	60.18	Continuous
		Monthly AVO	Monthly AVO	Monthly AVO

* After you have demonstrated compliance for two consecutive tests, you may reduce the frequency of subsequent performance tests to annually for MACT ZZZZ.

**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)(iii)]

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

1. NG Engines PSI HD 8.1L Turbo engine identified as Emissions Unit EU 25 in Table 2 of this permit.

OBSERVATION: EU 25 had a like-kind replacement on December 8, 2022. A notification of startup was provided pursuant to § 60.7(a)(3).

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:

Branch Chief, Air and Toxics Enforcement Branch, 8ENF-AT
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency, Region 8
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 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, 4SRB SI ICE with maximum engine hp greater than 100 hp and less than 500 hp.
 - (a) 1.0 gram per horsepower-hour (g/hp-hr) for nitrogen oxides (NO_x);
 - (b) 2.0 g/HP-hr for carbon monoxide (CO); and
 - (c) 0.7 g/HP-hr for volatile organic compounds (VOC).

OBSERVATION: A performance test was conducted within 60 days on January 27, 2023 after this engine started-up on December 8, 2022. The performance test was conducted within 60 days as specified in § 60.8(a).

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

The Permittee, as the owner and operator of stationary SI ICE that must comply with the emission standards specified in Section III.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)(ii); or
2. Purchasing a non-certified engine and demonstrating compliance with the emission standards specified in Section III.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 to demonstrate compliance.
 3. A subsequent performance test is required if the engine is rebuilt or undergoes major repair or maintenance as defined in 40 CFR 94.11(a).

OBSERVATION: Targa conducted an initial performance test according to the permit condition D.2. in this section above because a new engine applicable to these requirements in this section was installed December 8, 2022. See Table 4 below for the recent stack test.

Table 4: NSPS JJJJ Performance Test

Emission Unit	Performance Test Date	NOx(g/hp-hr)	CO (g/hp-hr)	VOC (g/hp-hr)	Pass/Fail
EU-25	1/27/2023	0.067	0.1104	0.006	Pass

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: Targa conducted 3x1 hour test runs using ASTM D6348-03 as specified in NSPS JJJJ.

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
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 submitted records of startup and performance tests according to these

requirements.

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 27 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.

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:

Branch Chief, Air and Toxics Enforcement Branch, 8ENF-AT
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency, Region 8
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: EPA inspectors did not document any deficiencies regarding good air pollution control practices at Junction pertaining to NSPS OOOO.

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 storage vessels at Junction are connected by a closed-vent system to a control device. EPA inspectors did not document any emissions venting from the closed-vent system or any unburned hydrocarbons escaping the control device.

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.

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 27 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 performance test discussion.

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 27, 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 storage vessels at Junction are connected by a closed-vent system to a control device. EPA inspectors did not document any emissions venting from the closed-vent system or any unburned hydrocarbons escaping the control device.

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 19, 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: 7.0 ppmv @ 3% O2 wet basis.

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 27 used to meet emission standards for EU 16 and EU 22 according to §60.5417(h).

OBSERVATION: The storage vessels at Junction are connected by a closed-vent system to a control device. EPA inspectors did not document any emissions venting from the closed-vent system or any unburned hydrocarbons escaping the control device.

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 19, 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: 7.0 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.

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 storage vessel closed-vent system monthly monitoring reports upon request.

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

Area of Concern: Targa conducts NSPS OOOOa fugitive emission surveys at Junction according to

information provided by Targa during the records review. EPA does not have records for why Junction is subject to NSPS OOOOa or what construction, modification or reconstruction occurred at the facility to make NSPS OOOOa an applicable regulation. More follow-up will be required regarding the applicability of NSPS OOOOa at Junction.

According to information provided in the Title V permit application update submitted May 24, 2019, the facility is not subject to NSPS OOOOa. Therefore, no NSPS OOOOa requirements were included in the Title V permit.

Area of Concern: EPA inspectors observed emissions coming from the inlet separator (MOV_0315.jpg) and a water removal vessel/water separator tower after the inlet separator (MOV_0316.jpg).

III. 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(a)-(d)]

1. 40 CFR part 63, subpart HH applies to the TEG Dehydrators identified as Emissions Units EU 7 and EU 21 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 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 affected sources located at an area source of HAP.

OBSERVATION: Targa operates a TEG dehydration unit at Junction which is an area source of HAP not located in a UA plus offset and UC boundary, therefore and shall comply with MACT HH by maintaining an optimum glycol recirculation rate according to § 63.764(d). During the onsite inspection EPA inspectors noted that EU 7 was visually confirmed off. EU 21 was the only dehydration unit operating. Targa representatives discussed that EU 7 is locked off currently.

B. General Standards [40 CFR 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:

Branch Chief, Air and Toxics Enforcement Branch, 8ENF-AT
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop Street
Denver, Colorado 80202-1129
Reports may be submitted on electronic media or via email to: r8airreportenforcement@epa.gov
3. The Permittee shall comply with the following requirements for the small glycol dehydrator at an area source as specified in §63.764(d)(2):

- (a) Determine the optimum glycol circulation rate using the formula specified in §63.764(d)(2)(i);
 - (b) Operate Emissions Units EU 7 and EU 21 such that the actual glycol circulation rate does not exceed the optimum glycol circulation rate determined in accordance with paragraph (a) of this section. If EU 7 and EU 21 are unable to meet the sales gas specification for moisture content using the glycol circulation rate determined in accordance with paragraph (a), the Permittee shall calculate an alternate circulation rate using GRI-GLYCalc™, Version 3.0 or higher. The Permittee shall document why EU 7 and EU 21 shall be operated using the alternate circulation rate and submit this documentation with the initial notification in accordance with §63.775(c)(7); and
 - (c) Maintain a record of the determination specified in paragraph (b) of this section in accordance with the requirements in §63.774(f) and submit the Initial Notification in accordance with the requirements in §63.775(c)(7). If operating conditions change and a modification to the optimum glycol circulation rate is required, the Permittee shall prepare a new determination in accordance with paragraph (a) of this section and submit the information specified under §63.775(c)(7)(ii) through (v).
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.

OBSERVATION: The dehydration unit glycol pump, model Kimray 9020PV, was counted to pump at approximately 14 strokes per minute. Emissions from the dehydration unit reboiler are routed to a tank that vents emissions to the atmosphere. The GLYCalc model performed in the May 24, 2019 Title V application used 1.49 gpm in the model run. According to information provided below from Kimray, the Kimray 9020PV has an approximate stroke rate of 0.038 gallons per stroke. Therefore, 14 strokes per minute equates roughly 0.532 gpm, which is less than Targa calculated in their GLYCalc report.

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 provided a ProMax glycol circulation rate during the records review which accounted for a glycol circulation rate of 0.45 gpm. Which is less than the 0.532 gpm noted while onsite by EPA inspectors. Targa is required to maintain the optimum glycol circulation rate and submit determination in accordance with MACT HH and the permit conditions above if there is a change to the optimum glycol circulation rate using GLYCalc.

C. Glycol Dehydration Unit Process Vent Standards [40 CFR 63.765(b) and (c)]

The Permittee shall comply with the control equipment requirements as follows:

- 1. Except as specified in §63.765(c), the Permittee shall comply with the applicable requirements for small glycol dehydration unit process vents at area sources of HAP specified in §63.765(b)(1) and (2).
 - (a) For each small glycol dehydration process vent, the Permittee shall control air emissions by limiting benzene, toluene, ethylbenzene and xylene (BTEX) emissions from each new small glycol dehydration unit process vent to the limit determined in Equation 2 of §63.765(b)(1)(iii). The limits determined using Equation 2 must be met in accordance with one of the alternatives specified below:

- (i) Connect the process vent to a control device or combination of control devices through a closed-vent system. The closed vent system shall be designed and operated in accordance with the requirements of §63.771(c). The control device(s) shall be designed and operated in accordance with the requirements of §63.771(f);
 - (ii) Meet the emissions limit through process modifications in accordance with the requirements specified in §63.771(e); or
 - (iii) Meet the emissions limit for each small glycol dehydration unit using a combination of process modifications and one or more control devices through the requirements specified in paragraphs (i) and (ii) of this section.
- (b) One or more safety devices that vent directly to the atmosphere may be used on the air emission control equipment installed to comply with paragraph (b)(1) of §63.765. The Permittee may also control air emissions by connecting the process vent to a process natural gas line.
 - (c) Control of HAP emissions from a GCG (gas-condensate-glycol) separator (flash tank) vent is not required if the Permittee demonstrates, to the EPA's satisfaction, that total BTEX emissions to the atmosphere from the glycol dehydration unit process vent are reduced to a level less than the limit calculated by Equation 2 of §63.765(b)(1)(iii), for each new small glycol dehydration unit

OBSERVATION: The provisions of § 63.765(b) and (c), as listed above from this permit V-TAT-000670-2015.00, do not apply to dehydration units operating at Junction.

D. Control Equipment Requirements [40 CFR 63.771(b), (c), (e), (f)]

1. For each cover, the Permittee shall comply with the cover requirements specified in §63.771(b).
2. The Permittee shall comply with the closed-vent system requirements specified in §63.771(c).
3. The Permittee shall comply with the process modification requirement specified in §63.771(e).
4. For each control device, as necessary, the Permittee shall comply with the applicable control device requirements to reduce HAP emissions for small dehydration units as specified in §63.771(f).

OBSERVATION: Targa appears to comply with MACT HH by complying with § 63.764(d)(2). Therefore, the permit requirements regarding cover, closed-vent systems and control devices (permit conditions D.1, D.2, and D.4 of this permit section) are not applicable to the operations at Junction.

Targa maintains records of the process modification requirements according to § 63.771(e)(1).

E. Test Methods, Compliance Procedures and Compliance Determination Requirements [40 CFR 63.772 (b)-(f)]

The Permittee shall determine compliance with the requirements of 40 CFR part 63, subpart HH using the applicable test methods and compliance procedures for small glycol dehydration units specified in §63.772.

1. The Permittee shall determine the glycol dehydration unit flowrate, benzene emissions or BTEX emissions as specified in §63.772(b).
2. The Permittee shall comply with the test procedures for no detectable emissions in accordance with Method 21, 40 CFR part 60, appendix A, as specified in §63.772(c).
3. The Permittee shall comply with the test procedures and compliance demonstrations for small glycol

dehydration units as specified in §63.772(d).

4. The Permittee shall comply with the test procedures for control device performance, as necessary, as specified in §63.772(e).
5. The Permittee shall comply with the compliance demonstration for control device performance requirements, as necessary, as specified in §63.772(f).

OBSERVATION: The control device performance requirements (permit conditions E.4 and E.5 of this permit section) do not apply to the dehydration units at Junction.

OBSERVATION: The dehydration unit at Junction does not operate a control device.

Area of Concern: Targa used ProMax to determine benzene concentration in their recent 2022 annual report, according to § 63.772(b)(2), the owner or operator shall 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. Therefore, ProMax is not approved software according to MACT HH.

F. Inspection and Monitoring Requirements [40 CFR 63.773 (c) and (d)]

1. For each closed-vent system or cover required by the Permittee to comply with 40 CFR part 63, subpart HH, the Permittee shall comply with the inspection and monitoring requirements specified in §63.773(c).
2. For each control device, as necessary, required by the Permittee to comply with 40 CFR part 63, subpart HH, the Permittee shall comply with the inspection and monitoring requirements as specified in §63.773(d).

OBSERVATION: Targa appears to comply with MACT HH by complying with § 63.764(d)(2). Therefore, the permit requirements regarding cover, closed-vent systems and control devices (permit conditions F.1 and F.2 of this permit section) are not applicable to the operations at Junction.

G. 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. The Permittee shall maintain the records specified in §§63.774(b), (c), (f), and (g).
3. Except as specified in §§63.774(c), the Permittee shall maintain the records specified in §63.774(b).
4. If compliance with the benzene emission limit specified in §63.765(b)(1)(ii) is elected, the Permittee shall document, to the Administrator's satisfaction, the items in §63.774(c).
5. The Permittee shall keep a record of the calculation used to determine the optimum glycol circulation rate in accordance with §63.764(d)(2)(i) or §63.764(d)(2)(ii), as applicable for an area source not located within a UA plus offset and UC boundary as specified in §63.774(f).
6. 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.

OBSERVATION: Targa appears to comply with MACT HH by complying with § 63.764(d)(2). Therefore, the permit conditions G.3 and G.2 of this permit section are not applicable to the operations at Junction.

Targa supplied records regarding the optimum glycol circulation rates and flow rates as requested by EPA inspectors during the offsite records request.

Area of Concern: 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 § 63.775(c)(7)(iii), records shall be reported using GRI-GLYCalc Version 3.0 or higher.

H. Reporting Requirements [40 CFR 63.775]

1. The reporting provisions of subpart A of this part, that apply and those that do not apply to the Permittee are listed in Table 2 of this subpart.
2. The Permittee shall submit the information for area sources specified in §63.775(c).
3. The Permittee shall submit Notification of Compliance Status Reports as specified in §63.775(d).
3. The Permittee shall submit Periodic Reports for area sources as specified in §63.775(e).
4. The Permittee shall submit notifications of process changes as specified in §63.775(f).
5. The Permittee shall comply with any applicable electronic reporting provisions specified at §63.775(g).

OBSERVATION: The provisions of § 63.775(e) and (g), as listed above from permit V-TAT-000670-2015.00, do not apply to dehydration units EU 7 and EU 21 operating at Junction.

Observation: The dehydration unit glycol pump, model Kimray 9020PV, was counted to pump at approximately 14 strokes per minute. Emissions from the dehydration unit reboiler are routed to a tank that vents emissions to the atmosphere. The GLYCalc model performed in the May 24, 2019 Title V application used 1.49 gpm in the model run. According to information provided below from Kimray, the Kimray 9020PV has an approximate stroke rate of 0.038 gallons per stroke. Therefore, 14 strokes per minute equates roughly 0.532 gpm, which is less than Targa calculated in their GLYCalc report.

Area of Concern: Targa provided a ProMax glycol circulation rate during the records review which accounted for a glycol circulation rate of 0.45 gpm. Which is less than the 0.532 gpm noted while onsite by EPA inspectors.

Area of Concern: 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 § 63.775(c)(7)(iii), records shall be reported using GRI-GLYCalc Version 3.0 or higher.

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

A. Applicability [40 CFR 63.6585(b)]

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

1. Caterpillar G3516LE engine identified as Emissions Unit EU 1 in Table 2 of this permit;
2. Caterpillar G3516LE engine identified as Emissions Unit EU 2 in Table 2 of this permit;
3. Waukesha L5774LT engine identified as Emissions Unit EU 18 in Table 2 of this permit; and
4. Caterpillar G3512LE engine identified as Emissions Unit EU 19² in Table 2 of this permit.

OBSERVATION: EU 19 was removed from the facility according to records provided in the SIXMON and MACT ZZZZ reports shown in Table 8 and Table 6, respectively, of this inspection report, respectively, below. Additionally, this was noted in the previous inspection. Therefore, EU 19 was not evaluated for compliance. Targa reported that EU-19 ceased operations on April 9, 2020 and was removed from the facility in October, 2021.

EPA inspectors verified the serial number and status of EU 1, EU 2 and EU 18. All three engines were operating at the time of the inspection.

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:

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

C. Compliance Date for RICE [40 CFR 63.6590(a)(2) and 63.6595(a)(3)]

This subpart applies to each affected source whereas Emissions Units EU 1, EU 2, EU 18 and EU 19 are new stationary RICE with a site rating of more than 500 hp located at a major source of HAP emissions and commenced construction after December 19, 2002 and must comply with the applicable emission limitations and operating limitations in this subpart upon startup.

OBSERVATION: EPA inspectors verified that the engines were equipped with catalysts to control emissions as required by MACT ZZZZ at the time of the inspection. EPA inspectors also verified the engines were equipped with catalyst temperature and pressure monitoring devices.

² Emissions Unit EU 19 commenced construction prior to December 19, 2002 and is considered an existing 4SLB RICE according to 40 CFR 63.6590(a)(1). There are no requirements for this engine, however as discussed in the Compliance Schedule, Section II. of this permit, the consent agreement (CAA-08-2019-0003) applies to this Emissions Unit. Therefore, the major source requirements for new stationary RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions apply to EU 19 through the termination date of the consent agreement, February 26, 2021.

D. Emission and Operating Limitations [40 CFR 63.6600(b), Table 2a.2 and Table 2b.1]

1. Emissions from engines, Emissions Unit EU 1, EU 2, EU 18 and EU 19, are new stationary RICE with a site rating of more than 500 hp located at a major source of HAP emissions and shall minimize the time spent at idle and minimize start up 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 emissions limitations apply. The engines shall meet either of the following emission limitations as specified in Table 2a.2:
 - a. Reduce CO emissions by 93.0% or more; or
 - b. Limit the concentration of formaldehyde to 14 parts per million, volumetric dry (ppmvd) or less at 15.0% oxygen (O₂).
2. Engines, EU 1, EU 2, EU 18 and EU 19 are new stationary RICE with a site rating of more than 500 hp located at a major source of HAP emissions that use an oxidation catalyst to comply with the emission limitations shall meet the following operating limitations as specified in Table 2b.1:
 - (a) Maintain the catalyst so that the pressure drop across the catalyst does not change by more than 2 inches of water at 100% load plus or minus 10% from the pressure drop across the catalyst that was measured during the initial performance test; and
 - (b) Maintain the temperature of each RICE's exhaust so that the catalyst inlet temperature is greater than or equal to 450°F and less than or equal to 1,350°F.

OBSERVATION: Targa complies with the requirement to limit concentration of formaldehyde to 14 ppmvd at 15% O₂ at Junction for EU 1, EU 2 and EU 18. EPA inspectors reviewed the performance tests during the records review, shown below in Table 5, which shows that Junction has maintained compliance with these requirements.

During the records review, EPA inspectors reviewed the previous 3 years of operating limitations of Table 2b.1 of MACT ZZZZ. Targa appears to monitor the catalyst pressures monthly for EU 1, EU 2 and EU 18 to within +/- 2 inches of water.

Area of Concern: During the records review, EPA inspectors reviewed temperature and pressure against Table 2b.1 of MACT ZZZZ since January 1, 2021 through June 16, 2023.

EU 1: EPA inspectors recorded 4272 instances of temperature deviations for EU 1. Which is about 5.3% of operating time errors for temperature sensor deviations.

EU 2: EPA inspectors recorded 5232 instances of temperature deviations for EU 2. Which is about 7.1% of operating time errors for temperature sensor deviations. Targa did not appear to record data for temperature sensors since April 12, 2023. EPA inspectors requested data up through the date of the inspection on June 15, 2023. EPA inspectors noted the engine as operating during the time of inspection.

EU 18: EPA inspectors recorded 11303 instances of temperature deviations for EU 18. Which is about 14.3% of operating time errors for temperature sensor deviations.

As noted in certain MACT ZZZZ reports in Table 6 below, Targa has issues with random zeroes in the temperature data output. EPA inspectors reviewed the information provided during the records review and the instances of temperature deviations noted above are consistent with primarily the dataset recording zeroes. Therefore, it cannot be determined if the operating limitations are being met during these instances.

E. General Compliance Requirements [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 does not appear to operate the CPMS to maintain operating limitations as required by MACT ZZZZ.

F. Performance Testing Requirements [40 CFR 63.6615, 63.6620, Table 3 and Table 4]

1. The Permittee, as the owner and operator of a new 4SLB stationary RICE with greater than 500 hp located at a major source of HAP emissions shall comply with the chosen emission limit in Table 2a.2 by complying with either of the following the requirements:
 - (a) Conducting semiannual performance tests as specified in Table 3.1 if complying with the requirement to reduce CO emissions for each RICE exhaust; or
 - (b) Conducting semiannual performance tests as specified in Table 3.3 if complying with the requirement to limiting the concentration of formaldehyde for each RICE exhaust.
2. After demonstrating compliance for two consecutive tests, the Permittee may reduce the frequency of subsequent performance tests to annually. If the results of any subsequent annual performance test indicate the stationary RICE is not in compliance with the CO or formaldehyde emission limitation, or the Permittee deviates from any of the permitted operating limitations, the Permittee shall resume semiannual performance tests.
3. The Permittee shall follow the requirements for performance tests for each RICE subject to an emission limit of Table 2a.2 by complying with the requirement to reduce CO emissions or limit the concentration of formaldehyde as specified in Table 4.3.
4. If a RICE at the facility is non-operational and subject to performance testing, the Permittee does not need to start up the engine solely to conduct the performance test. Instead, a non-operational engine can have the performance test conducted when the engine is started up again. The test must be conducted at any load condition within plus or minus 10% of 100% load for the stationary RICE.
5. The Permittee shall conduct three separate test runs for each performance test required. Each test run shall last at least 1 hour, as specified in §63.6620(d).
6. The Permittee shall use Equation 1 as specified in §63.6620(e) to determine compliance with the percent reduction requirements.
7. The Permittee shall document the engine test parameters as specified in §63.6620(i).

OBSERVATION: Targa conducts performance tests using ASTM D6348-03 according to the requirements in MACT ZZZZ. Results of the performance tests are shown below in Table 5.

Table 5: Results of MACT ZZZZ Performance Tests

Emission Unit	Test Date	CH ₂ O ppmvd@15%O ₂	Catalyst inlet temp (F)	Avg dP	Average Load (%)
EU-1	12/8/2020	1.76	847	2.7	95
EU-2	12/8/2020	0.98	745	1.6	98
EU-18	12/9/2020	0.88	813	1.9	90
#1 (EU 2)	6/8/2021	4.48	1020	3.2	91.35
#2 (EU 1)	6/8/2021	3.45	1085	2.2	95
#3 (EU 18)	6/9/2021	3.13	826	3	95
#1 (EU 2)	12/8/2021	3.96	877	1.9	91
#2 (EU 1)	12/8/2021	3.54	1041	2.3	95
#3 (EU 18)	1/18/2022	1.17	782	2.3	92
EU-1	12/5/2022	1.59	861	1.9	90
EU-2	12/5/2022	4.69	829	5.1	90
EU-18	12/6/2022	2.04	803	2.1	90

G. Monitoring, Installation, Collection, Operation and Maintenance Requirements [40 CFR 63.6625]

The Permittee is required to install, operate, and maintain a continuous parameter monitoring system (CPMS) as specified in §63.6625(b).

OBSERVATION: The engines EU 1, EU 2 and EU 18 are equipped with catalysts to reduce CH₂O emissions to 14 ppmvd or less at 15%O₂, catalyst temperature probes and pressure monitoring devices.

Area of Concern: Targa must install CPMS to continuously monitor catalyst inlet temperature and pressure drop across the catalyst according to the requirements in § 63.6625(b) as specified in Table 5.7 of MACT ZZZZ to demonstrate continuous compliance. See above for discussion on temperature errors. Most of the temperature deviations appeared to be failures to record actual values. As noted in certain MACT ZZZZ reports in Table 6 below, Targa has issues with random zeroes in the temperature data output. EPA inspectors reviewed the information provided during the records review and the instances of temperature deviations noted above are consistent with primarily the dataset recording zeroes. Therefore, it cannot be determined if the operating limitations are being met during these instances. During the records review, Targa provided what appears to be the CPMS equipment performance evaluation which does not include the required information as specified in § 63.6625(b). Targa did not provide the following:

The CPMS Plan was not site-specific according to § 63.6625(b)(1).

The CPMS Plan did not include site-specific installation, operation and maintenance procedures according to § 63.6625(b)(2).

The CPMS continues to collect false data without resolution, therefore not collecting actual data, and was not provided according to § 63.6625(b)(5).

Targa did not provide annual results from the performance evaluation of each CPMS according to § 63.6625(b)(5) and § 63.6625(b)(6).

H. Initial Compliance Requirements [40 CFR 63.6630 and Table 5]

1. The Permittee, as the owner and operator of a new non-emergency 4SLB stationary RICE with greater than 500 hp located at a major source of HAP emissions shall comply with the chosen emission limit in Table 2a.2 by demonstrating initial compliance for each RICE according to either of the following requirements:

- (a) Follow Table 5.1 to comply with the requirement to reduce CO emissions and using oxidation catalyst and using a CPMS; or
 - (b) Follow Table 5.9 to comply with the requirement to limit the concentration of formaldehyde in the exhaust and using an oxidation catalyst and using a CPMS.
2. The Permittee shall establish each operating limitation as specified in Table 2b.1 during the initial performance test as specified in §63.6630(b).

OBSERVATION: Initial compliance requirements were conducted before 2020 and therefore was not reviewed for compliance.

I. Continuous Compliance Requirements [40 CFR 63.6635 and 63.6640]

1. The Permittee shall monitor and collect data to demonstrate continuous compliance as specified in 63.6635(a)-(c).

Area of Concern: According to § 63.6635(b), “a monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.” Targa has shown to have issues with random zeroes in the engine monitoring data but has provided no updates on software fixes since the previous inspection. After reviewing the engine monitoring data at Junction, the issues still persist.

2. The Permittee, as the owner and operator of a new non-emergency 4SLB stationary RICE with greater than 500 hp located at a major source of HAP emissions shall comply with the chosen emission limit in Table 2a.2 by demonstrating continuous compliance for each RICE according to either of the following requirements:
- (a) Follow Table 6.1 to comply with the requirement to reduce CO emissions and using oxidation catalyst and using a CPMS; or
 - (b) Follow Table 6.7 to comply with the requirement to limit the concentration of formaldehyde in the exhaust and using an oxidation catalyst and using a CPMS.
3. The Permittee shall report each instance where EU 1, EU 2, EU 18 or EU 19, did not meet each emission limitation, operating limitation, or requirement as specified in §63.6640(b) and (e).

OBSERVATION: Targa submits instances where the engines do not meet emission limits or operating limits, shown below in Table 6.

Area of Concern: As noted above, Targa has issues where the CPMS will record zeroes. During the records review, EPA inspectors reviewed the temperature data where it appears that Targa is not reporting deviation time appropriately. Therefore, it appears that Targa is not reporting each instance where the engines at Junction did not meet each operating limitation appropriately.

Area of Concern: During the records review, EPA inspectors reviewed temperature and pressure against Table 2b.1 of MACT ZZZZ since January 1, 2021 through June 16, 2023.

EU 1: EPA inspectors recorded 4272 instances of temperature deviations for EU 1. Which is about 5.3% of operating time errors for temperature sensor deviations.

EU 2: EPA inspectors recorded 5232 instances of temperature deviations for EU 2. Which is about 7.1% of operating time errors for temperature sensor deviations. Targa did not appear to record data for temperature sensors since April 12, 2023. EPA inspectors requested data up through the date of the inspection on June 15, 2023. EPA inspectors noted the engine as operating during the time of inspection.

EU 18: EPA inspectors recorded 11303 instances of temperature deviations for EU 18. Which is about 14.3% of operating time errors for temperature sensor deviations.

Table 6: MACT ZZZZ Semiannual reports

Sent	Reporting Period	Deviations	Notes
7/27/2021	1/1/21-6/30/21	Multiple malfunction periods of recorded temperature data that displayed 0°F. One hour combined for period of malfunctions for all engines during reporting period.	
1/20/2022	7/1/21-12/31/21	No deviations reported. CMS parameters established during second quarter of 2020, no changes in CMS.	
7/29/2022	1/1/22-6/30/22	From 8:13 on February 25, 2022 through 20:51 on February 27, 2022 (3,638 total minutes) there were multiple malfunction periods of recorded temperature that displayed 0°F for EU1, EU2 and EU18. The engines were operating and valid temperatures were recorded both before and after these malfunction periods. Deviation as a percent of operating time per engine: EU1 (1.45%), EU2 (1.66%), EU18 (1.46%).	Report for Engines: EU19 was removed from the facility
2/22/2023	7/1/22-12/31/22	On 9/22/2022, each engine at the facility recorded an error signal for 45 minutes from 4:21 PM to 5:06 PM. Random zeroes in the temperature data are believed to be from a software communications problem. This would equate to approximately 0.01% downtime if it were considered a deviation.	Operating hours: EU-1: 7,696 EU-2: 7,826 EU-18: 8,450

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

1. The Permittee shall submit notifications as specified in §63.6645.
2. The Permittee shall submit reports as specified in §63.6650 and Table 7.1.
3. The Permittee shall keep records as specified in §63.6655.
4. The Permittee shall keep the records in the format and for the duration as specified in §63.6660.

OBSERVATION: Targa submits reports as required by MACT ZZZZ. Targa also maintains and supplied records of data as requested by EPA inspectors. It appears that Targa is not submitting MACT ZZZZ reports to include each instance where the engines at Junction did not meet each operating limitation appropriately as required in § 63.6650(c), (e) and (f).

VII. 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.

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, 2020. 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 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 8 below.

VIII. 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)

For non-U.S. Postal Service express mail

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

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 greenhouse gas (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

- (iii) 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 Junction.

Table 7: Fee year and annual actual emissions

Fee Year	NO _x	VOC	SO ₂	PM ₁₀	HAP Total	Fee Paid
2020	27.4	129.1	0.1	0.8	8.1	\$8,594.04
2021	50.6	120.4	0.06	0.1	6.7	\$10,003.32
2022	74.72	123.61	0.07	1.25	6.72	\$12,469.91

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 7 above. Targa submits 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: Targa submits documentation of TV annual compliance (TVACC's) however the reports are lacking detail. See below in Table 8.

Area of Concern: The SIXMON and TVACC's should contain the reporting elements as described in this permit. Including, but not limited to, MACT ZZZZ deviations.

Table 8: SIXMON and TVACC reports

Sent	Received	Report Type	Reporting Period	Deviations
9/24/2021		SIXMON	1/1/21-6/30/21	None reported
1/20/2022		SIXMON	7/1/21-12/31/21	None reported
		TVACC		None reported
7/29/2022	8/4/2022	SIXMON	1/1/22-6/30/22	None reported
2/24/2023	3/2/2023	SIXMON	7/1/22-12/31/22	None reported. EU-19 has been removed from the facility.
2/24/2023	3/2/2023	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)]

- 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.
- 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)]

- 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:

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

OBSERVATION: Targa submits reports as required by the provisions of this permit. See Table 8 above.

Area of Concern: The SIXMON and TVACC's should contain the reporting elements as described in this permit. Including, but not limited to, MACT ZZZZ deviations.

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 permit amendments have been requested during the time 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 permit modifications have been requested during the time 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 permit modifications have been requested during the time 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

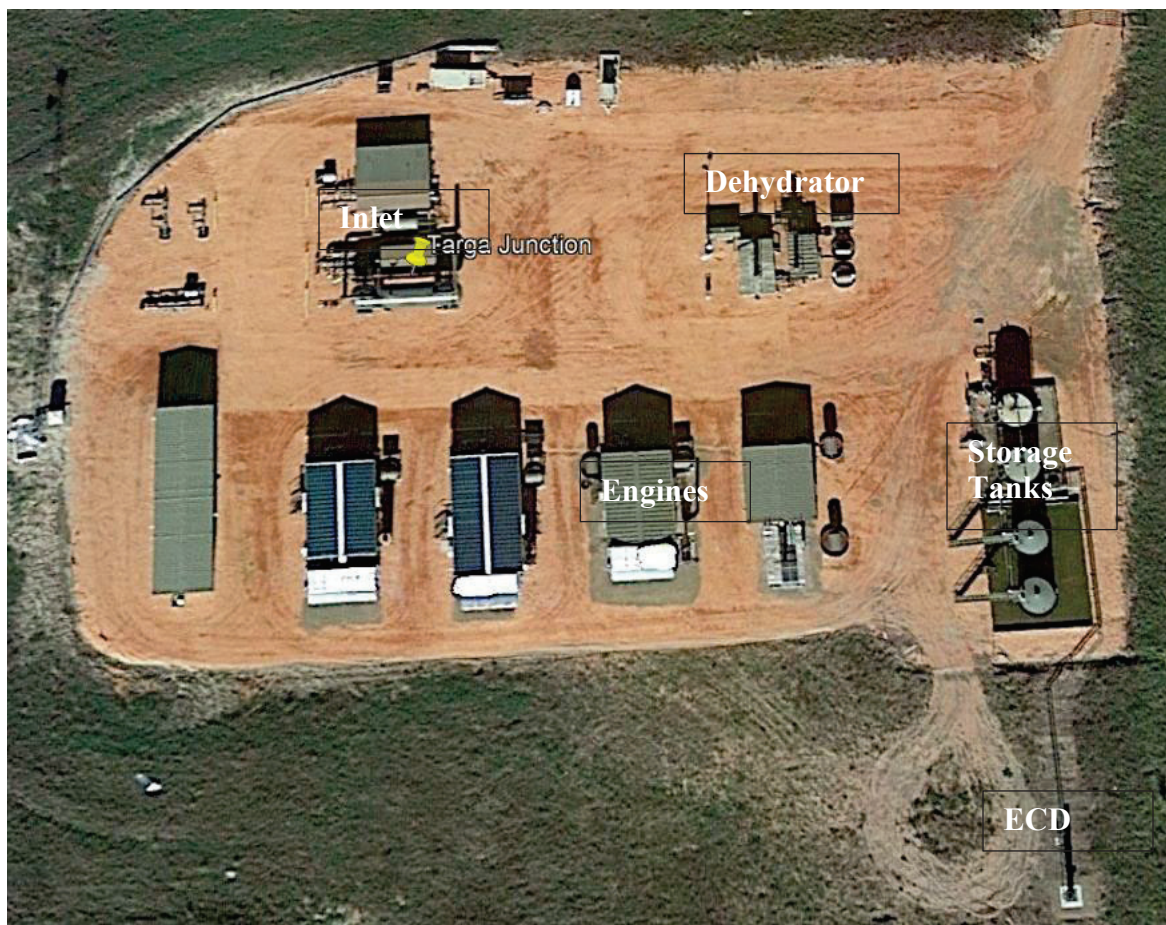
must describe each change, the date of the change, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change;

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_0315	Inlet seperator emissions	P. Myers
MOV_0316	Water removal vessel/water seperator tower emissions	P. Myers