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

Inspection Date:	June 15, 2023
Inspection Report Date:	August 2, 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
Last Inspection:	August 18, 2020
Operating Status:	Operating
Applicable Requirements:	40 CFR Part 60, Subpart JJJJ: Standards of Performance for New Stationary Spark Ignition Internal Combustion Engines (NSPS JJJJ) 40 CFR Part 60, Subpart OOOO Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After August 23, 2011, and on or before September 18, 2015 (NSPS OOOO) 40 CFR Part 60, Subpart OOOOa Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 (NSPS OOOOa) 40 CFR Part 63, Subpart HH) National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities (MACT HH) 40 CFR Part 63, Subpart ZZZZ: National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (MACT ZZZZ)

SCOTT PATEFIELD Digitally signed by SCOTT PATEFIELD Date: 2023.08.14 14:12:02 -06'00'

Permit Number: V-TAT-000752-2019.01
Replaces Permit No.: V-TAT-000752-2019.00

Issue Date: October 4, 2021
Effective Date: October 4, 2021
Expiration Date: October 1, 2026

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 – Roberts Trust Compressor Station (Roberts Trust)
Facility Location:	Latitude 47.63229, Longitude -102.60386
County, State:	Dunn 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:	38-025-00053
Other CAA Permits:	There are no other CAA permits for this facility.

Enforcement History

There have been no finalized enforcement actions at the time of the inspection.

Inspection Findings/Areas of Concern

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

1. EPA would advise Targa to contain more information in the work orders to ensure operating requirements are being met. Certain work orders reviewed do not contain information regarding engine operating hours or type of maintenance conducted on the emission controls. For example, work order 165005 and 165002 does not contain the engine operating hours at the time of the maintenance conducted.
2. Targa did not provide records of a performance test for the control device EU 36. Targa provided performance tests for all other facilities that occurred in November 2020, including for Roberts Trust II, EU 23. EPA has concerns that the ECD at Roberts Trust I has not received a performance test as required by § 60.5412(d). The ECD at Roberts Trust I is a TriPoint series where the model has not been exempted from performance tests according to § 60.5413(d). Therefore, this control device is required to receive a performance test.
3. According to information provided by Targa in both the SIXMON and TVACC sent by Targa February 17, 2023, shown in Table 8 below, Targa exceeded the condensate throughput limit of 94,925 bbls per year. It was noted that the final throughput was 119,880 bbls by 12/31/2022. While this permit does not contain a throughput limit for condensate, the bbls per year were initially a conservative estimate for maximum throughput of condensate to Roberts Trust established by Targa. As specified in § 60.5413a(b)(5)(ii), Targa must conduct subsequent performance tests to establish a new operating limit. The ECD was not venting emissions as seen on the FLIR camera but the higher tank throughput may need to be accounted for according to § 60.5413a(b)(5)(ii) with the higher throughput estimates that Targa has established. EPA has concerns that the ECD may need to be optimized as specified by the manufacturer to account for increased throughputs.
4. 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 §§ 63.764(d)(2) and 63.775(c)(7)(iii), records shall be reported using GRI-GLYCalc Version 3.0 or higher.

5. EPA has concerns that as a major source of HAP Targa did not appear to conduct performance tests for EU 27, EU 28, EU 29, EU 30 and EU 31 since 2020 as required by § 63.6615 and § 63.6620. Additionally, there are CPMS and reporting concerns at Roberts Trust, 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 Operations[1]

Robert's Trust Compressor Station (Robert's Trust) is a natural gas compressor station which receives a comingled liquid stream containing natural gas, natural gas condensate and produced water from third-party production wells in the surrounding field. The gas enters the facility through a Pipe Inspection Gauge (PIG) to a 3-phase separator, where liquids are gravimetrically separated. The natural gas condensate and produced water are routed to the condensate storage tanks and the produced water storage tanks, respectively. Vapor emissions from the condensate and produced water storage tanks are routed to a vapor combustor for destruction. Once adequate volumes are accumulated in the storage tanks, the condensate and produced water are trucked off site for further processing or treatment.

Natural gas exits the separator and flows to three compressor engines (Emissions Units EU 1, EU 2 and EU 15 in Table 2 below) which compresses the gas before it enters either of the two triethylene glycol (TEG) dehydration units (Emissions Units EU 17 and EU 26 in Table 2 below). The compressed natural gas enters EU 17 or EU 26 and is bubbled up through lean TEG in a process vessel called a contactor. During this process, water vapor is removed from the gas to a concentration determined by a sales contract. The pipeline quality natural gas then exits the contactor, is metered and then routed off site. The rich TEG exits the contactor and is depressurized in a TEG flash tank. The emissions from the flash tank are vented to the atmosphere. The depressurized TEG is routed to and regenerated using heat in a vessel called a TEG reboiler. Methanol is injected at different points into the rich TEG to prevent hydrates from forming. The vapors from the TEG reboiler are also vented to the atmosphere. The regenerated lean TEG is circulated back to the contactor.

General Inspection Observations and Commentary

EPA representatives Colin LeCortz, Bob Gallagher, Griffith Brown and Phil Myers, met with Targa representatives at Roberts Trust Compressor Station (Roberts Trust) operated by Targa at 12:11 PM 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 Roberts Trust.

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

[1] The description of operations provided here is a modified excerpt from the process description from the Title V Permit, V-TAT-000752-2019.01.

1. Roberts Trust is split into 2 sections of compression but each section of the facility, named Roberts Trust I and Roberts Trust II, share an inlet seperator. The 2 sections are within ¼ mile of each other, and share equipment.
2. The Roberts Trust I facility has 1 condensate tank, and 1 produced water tank. Roberts Trust II has 3 NGL tanks and 1 produced water tank.

The following observations were taken during the facility walkthrough:

1. Both enclosed combustion devices (ECD), were confirmed on and operating at Roberts Trust I and Roberts Trust II. No emissions appeared to be venting when viewed by IR from either of the ECD's. All burners were lit in the array of the ECD's.
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 pressure and temperature sensor connections from the engine catalysts that did not appear to be connected to any monitoring system. The sensor connections appeared to be hanging from the engine catalysts near ground level underneath the engine exhaust piping.
4. The dehydration unit at Roberts Trust I, EU 17, 12 MMscfd TEG dehydration unit, operates a glycol pump, model Kimray 9020PV (Colin LeCortz's inspection notes inadvertently called this a 9015PV which was not correct), was counted to pump at approximately 16 strokes per minute. The dehydration unit at Roberts Trust II EU 26, 36 MMscfd TEG dehydration unit, operates a glycol pump, model Kimray 21020PV, was counted to pump at approximately 12 strokes per minute. Emissions from both dehydration unit reboilers are routed to a tank that vents emissions to the atmosphere.
   According to information provided from Kimray, the Kimray 9020PV has an approximate stroke rate of 0.038 gallons per stroke. Therefore, 16 strokes per minute equates roughly 0.608 gpm. The Kimray 21020PV has an approximate stroke rate of 0.109 gallons per stroke. Therefore, 12 strokes per minute equates roughly 1.308 gpm.
5. 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 5, EU 31, Roberts Trust II	April, 2018	Model: L5794GSI SN: 5283705635	32	32	0.0	64	30467
ENG 3, EU 29, Roberts Trust II	August, 2017	Model: L5794GSI SN: 5283705415	974	951	Not monitored by Targa	70	31530
ENG 1, EU 27, Roberts Trust II	August, 2017	Model: L5794GSI SN: 5283705414	892	957	Not monitored by Targa	69	31953
ENG 2, EU 28, Roberts Trust II	March, 2019	Model: L5794GSI SN: 5283705934	32	32	0.0	63	29310

ENG 4, EU 30, Roberts Trust II	April, 2019	Model: L5794GSI SN: 3193204	32	32	0.0	70	31530
ENG 3, EU 15, Roberts Trust I	October, 2014	Model: JEF63086	894	911	Not monitored by Targa	87	54220

* 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.

The onsite ECU's did not appear to monitor engine parameters of MACT ZZZZ correctly for temperature at certain engines that were operating above, and pressure across the catalyst was not monitored from onsite ECU's.

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 engine monitoring parameters that appear to not be monitored onsite, 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 12:57 PM. 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 Roberts Trust

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

Emissions Unit Id.*	NO_X (tons/ yr)	VOC (tons/ yr)	SO_2 (tons/ yr)	PM_{10} (tons/ yr)	$PM_{2.5}$ (tons/ yr)	CO (tons/yr)	Lead (tons/yr)	CO_2e (tons/yr)	CH_2O (tons/yr)	Total HAP (tons/yr)
EU 1[a,d]	25.88	7.12	0.03	0.49	0.49	23.68	-	7129.61	3.23	4.39
EU 2[a,d]	25.88	7.12	0.03	0.49	0.49	23.68	-	7129.61	3.23	4.39
EU 5	0.15	<0.01	<0.01	0.01	0.01	0.13	-	30.18	<0.01	<0.01
EU 8	-	0.02	-	-	-	-	-	-	-	0.02

EU 9	-	0.02	-	-	-	-	-	-	-	-
EU 10	-	0.12	-	-	-	-	-	<0.01	-	<0.01
EU 11[b,c]	-	0.74	-	-	-	-	-	-	-	0.03
EU 12	-	8.37	-	-	-	-	-	<0.01	-	0.36
EU 14	-	10.72	-	-	-	-	-	80.22	-	1.56
EU 15[a,d]	6.66	14.39[a]	0.03	0.49	0.49	26.65	-	7408.99	1.53	7.84
EU 16	0.08	<0.01	<0.01	<0.01	<0.01	0.06	-	15.09	<0.01	<0.01
EU 17	-	4.87	-	-	-	-	-	17.13	-	1.10
EU 18	-	0.02	-	-	-	-	-	-	-	0.02
EU 19	-	0.02	-	-	-	-	-	-	-	-
EU 20	-	0.12	-	-	-	-	-	<0.01	-	<0.01
EU 21[c]	-	0.74	-	-	-	-	-	-	-	0.03
EU 22	-	25.11	-	-	-	-	-	<0.01	-	1.08
EU 23	0.11	2.47	<0.01	-	-	0.50	-	230.00	-	0.08
EU 24	-	13.63	-	-	-	-	-	98.53	-	1.97
EU 25	0.21	0.01	<0.01	0.02	0.02	0.17	-	10.74	<0.01	<0.01
EU 26	-	25.44	-	-	-	-	-	179.98	-	1.35
EU 27[a,d]	13.33	9.99[a]	0.03	0.90	0.90	26.65	-	6820.80	0.67	1.2
EU 28[a,d]	13.33	9.99[a]	0.03	0.90	0.90	26.65	-	6820.80	0.67	1.2
EU 29[a,d]	13.33	9.99[a]	0.03	0.90	0.90	26.65	-	6820.80	0.67	1.2
EU 30[a,d]	13.33	9.99[a]	0.03	0.90	0.90	26.65	-	6820.80	0.67	1.2
EU 31[a,d]	13.33	9.99[a]	0.03	0.90	0.90	26.65	-	6820.80	0.67	1.2
EU 33[c]	-	0.74	-	-	-	-	-	-	-	0.03
EU 34[c]	-	0.74	-	-	-	-	-	-	-	0.03
EU 36[b]	0.06	0.99	<0.01	-	-	0.29	-	135.14	-	0.03
Pigging	-	17.32	-	-	-	-	-	327.12	-	0.40
TOTAL	125.66	190.8	0.23	5.99	5.99	208.42	-	56926.36	11.33	30.08

*NO_X = nitrogen oxide; VOC = volatile organic compound; SO_2 = sulfur dioxide; PM = particulate matter; CO = carbon monoxide; CO_2e = carbon dioxide equivalent; CH_2O = formaldhyde; HAP = hazardous air pollutant.

a. Based on the enforceable emission limit of 1.0 g/hp-hr NO_X, 2.0 g/hp-hr CO and 0.7 g/hp-hr of VOC, limit in the Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (NSPS JJJJ).

b. Emissions from EU 11 are routed to EU 36 and the controls are based on the applicable enforceable emissions limit to reduce VOC emissions by 95.0%, from the Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After August 23, 2011 (40 CFR 60 Subpart NSPS OOOO). Emissions from EU 36 are those generated by operation of the device.

c. Emissions from EU 21, EU 33 and EU 34 are routed to EU 23 and the controls are based on the applicable enforceable emissions limit from the Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 (40 CFR 60 Subpart NSPS OOOOa). Emissions from EU 23 are those generated by operation of the device.

d. Emission Unit EU 1, EU 2, EU 15, EU 27, EU28, EU 29, EU 30 and EU 31, are subject to 40 CFR part 63, subpart ZZZZ.

Federally Enforceable Requirements and Compliance Status

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

Emissions Unit ID	Description (acronyms defined below table)	Control Equipment
EU 1		Oxidation Catalyst

	Caterpillar G3516TALE, 11.18 MMBtu/hr, 1,340 hp, 4SLB Natural Gas Compressor Engine: Serial Number: 4EK05136; Ariel JGK/4 Reciprocating Compressor Install Date: August 1, 2011 Manufacture Date: June 29, 2006 Compressor Install Date: August 1, 2011 Compressor Manufacture Date: August 1, 2007 **Removed from Roberts Trust**	
EU 2	Caterpillar G3516TALE, 11.18 MMBtu/hr, 1,340 hp, 4SLB Natural Gas Compressor Engine: Serial Number: WPW00905; Ariel JGK/4 Reciprocating Compressor Install Date: August 18, 2018 Manufacture Date: April 27, 2007 Compressor Install Date: August 1, 2011 Compressor Manufacture Date: August 1, 2006 **Removed from Roberts Trust**	Oxidation Catalyst
EU 5	Tank Heater, 0.5 MMBtu/hr	None (IEU)
EU 8	1,050 gal Methanol Storage Tank #1 Install Date: August 31, 2011	None (IEU)
EU 9	Produced Water Tank #1, 400 bbl Install Date: August 31, 2011	Vapor Combustor (EU 36)
EU 10	Produced Water Loading Losses #1, 20,668 bbl/yr throughput	None (IEU)
EU 11	400 bbl Condensate Tank #1 Install Date: August 31, 2011	Vapor Combustor #1 (EU36)
EU 12	Condensate Loading Losses #1, 31,639 bbl/yr throughput	None (IEU)
EU 14	Fugitive Emissions #1	None (IEU)
EU 15	Caterpillar G3516B, 11.24 MMBtu/hr, 1,380 hp, 4SLB Natural Gas Compressor Engine: Serial Number: JEF03086: Ariel JGK/4 Reciprocating Compressor Install Date: August 1, 2015 Manufacture Date: October 1, 2014 Compressor Install Date: August 1, 2015 Compressor Manufacture Date: November 1, 2014	Oxidation Catalyst
EU 16 EU 17	0.25 MMBtu/hr Glycol Reboiler #1 12.0 MMscfd TEG* Dehydrator Unit #1,	None (IEU)
EU 18	Methanol Storage Tank #2, 1,050 gallons Install Date: July 1, 2018	None (IEU)
EU 19		Vapor Combustor

	Produced Water Tank #2, 400 bbl Install Date: July 1, 2018	(EU 23)
EU 20	Produced Water Loading Losses #2, 20,668 bbl/yr throughput	None (IEU)
EU 21	400 bbl Condensate Storage Tank #2 Install Date: July 1, 2018	Vapor Combustor (EU23)
EU 22	Condensate Loading Losses #2, 94,915 bbl/yr throughput	None (IEU)
EU 23	Tripoint Vapor Combustor #2 to control condensate and produced water tank emissions Serial Number: 82072 Install Date: October 31, 2018	None (IEU)
EU 24	Fugitive Emissions #2	None (IEU)
EU 25 EU 26	0.68 MMBtu/hr Glycol Reboiler #2 TEG Dehydrator Process Vents #2, 36 MMscfd	None
EU 27	Waukesha L5794GSI, 10.55 MMBtu/hr, 1,380 hp, 4SRB Natural Gas Compressor Engine: Serial Number: 5283705414; Ariel JGK/4 Reciprocating Compressor Install Date: August 15, 2018 Manufacture Date: August 1, 2017 Compressor Install Date: August 15, 2018 Compressor Manufacture Date: August 1, 2017	NSCR
EU 28	Waukesha L5794GSI, 10.55 MMBtu/hr, 1,380 hp, 4SRB Natural Gas Compressor Engine: Serial Number: 5283705934; Ariel JGK/4 Reciprocating Compressor Install Date: May 15, 2019 Manufacture Date: March 1, 2019 Compressor Install Date: May 15, 2019 Compressor Manufacture Date: November 1, 2017	NSCR
EU 29	Waukesha L5794GSI, 10.55 MMBtu/hr, 1,380 hp, 4SRB Natural Gas Compressor Engine: Serial Number: 5283705415; Ariel JGK/4 Reciprocating Compressor Install Date: August 15, 2018 Manufacture Date: August 1, 2017 Compressor Install Date: August 15, 2018 Compressor Manufacture Date: August 1, 2017	NSCR
EU 30	Waukesha L5794GSI, 10.55 MMBtu/hr, 1,380 hp, 4SRB Natural Gas Compressor Engine: Serial Number: 3193204; Ariel JGK/4 Reciprocating Compressor Install Date: May 15, 2019 Manufacture Date: April 1, 2019 Compressor Install Date: May 15, 2019	NSCR

	Compressor Manufacture Date: February 1, 2019	
EU 31	Waukesha L5794GSI, 10.55 MMBtu/hr, 1,380 hp, 4SRB Natural Gas Compressor Engine: Serial Number: 5283705635; Ariel JGK/4 Reciprocating Compressor Install Date: August 15, 2018 Manufacture Date: April 1, 2018 Compressor Install Date: August 15, 2018 Compressor Manufacture Date: August 1, 2017	NSCR
EU 33	400 bbl Condensate Storage Tank #3 Install Date: July 1, 2018	Vapor Combustor (EU 23)
EU 34	400 bbl Condensate Storage Tank #4 Install Date: July 1, 2018	Vapor Combustor (EU 23)
EU 36	Tripoint Vapor Combustor #1 to control produced water and condensate tank emissions. Serial Number: 82070 Install Date: October 31, 2018	None (IEU)
EU Pigging	PIG Launching/Receiving	None (IEU)

*4SRB = 4-stroke rich-burn; 4SLB = 4-stroke lean-burn; gal = gallon; MMBtu/hr = million British thermal units per hour; hp = horsepower; MMscfd = million standard cubic feet per day; bbl = barrel; NSCR = Non-Selective Catalytic Reduction; TEG = Triethylene Glycol; IEU = insignificant emission units.

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

A. Facility Emission Points

Table 3 – Emissions Units and Emissions-Generating Activities

Table 3: Requirements for Emission Units

Equipment	Applicable Requirements	Limitations	Monitoring	
			Method	Interval
~~EU 1~~ **Removed from Roberts Trust**	~~MACT ZZZZ~~	~~Reduce CO 93% or limit CH2O to 14 ppmvd~~	~~Performance Test~~	~~Semiannual or annual*~~
~~EU 2~~ **Removed from Roberts Trust**	~~MACT ZZZZ~~	~~Reduce CO 93% or limit CH2O to 14 ppmvd~~	~~Performance Test~~	~~Semiannual or annual*~~
EU 5	NA	NA	NA	NA
EU 8	NA	NA	NA	NA
EU 9	NSPS OOOOa	LDAR Program Closed vent system	Method 21/OGI	Semiannually
EU 10	NA	NA	NA	NA

EU 11	NA	NA	NA	NA
EU 12	NA	NA	NA	NA
EU 14	NSPS OOOOa	LDAR Program	Method 21/OGI	Semiannually
EU 15	MACT ZZZZ	Reduce CO 93% or limit CH2O to 14 ppmvd	Performance Test	Semiannual or annual*
	NSPS JJJJ	NOx = 1.0 g/hp-hr CO = 2.0 g/hp-hr VOC = 0.7 g/hp-hr	Performance test	Every 8,760 hours of op or 3 years
	NSPS OOOO	Rod Packing	60.5385(a)(1)/(2)	Change rod packing every 26,000 hours or 36 months.
EU 16 EU 17	MACT HH	Maintain optimum glycol circulation rate	63.764(d)(2)	Continuously maintain optimum glycol circulation rate
EU 18	NA	NA	NA	NA
EU 19	NSPS OOOOa	LDAR Program Closed vent system	Method 21/OGI	Semiannually
EU 20	NA	NA	NA	NA
EU 21	NSPS OOOOa	LDAR Program Closed vent system	Method 21/OGI	Semiannually
EU 22	NA	NA	NA	NA
EU 23	NSPS OOOOa	95.0% DRE	60.18	Continuous
EU 24	NSPS OOOOa	LDAR Program	Method 21/OGI	Semiannually
EU 25 EU 26	MACT HH	Maintain optimum glycol circulation rate	63.764(d)(2)	Continuously maintain optimum glycol circulation rate

EU 27	MACT ZZZZ/ NSPS JJJJ	Limit CH2O to 14 ppm @ 15.0% O2 (MACT ZZZZ) and 0.7 g/hp-hr VOC, 2.0 g/hp-hr CO, 1.0 g/hp-hr NOx, NSPS JJJJ	Performance test	Semiannually or Annually*
	NSPS OOOOa	Rod Packing	60.5385a(a)(1)\ (2)	Change rod packing every 26,000 hours or 36 months.
EU 28	MACT ZZZZ/ NSPS JJJJ	Limit CH2O to 14 ppm @ 15.0% O2 (MACT ZZZZ) and 0.7 g/hp-hr VOC, 2.0 g/hp-hr CO, 1.0 g/hp-hr NOx, NSPS JJJJ	Performance test	Semiannually or Annually*
	NSPS OOOOa	Rod Packing	60.5385a(a)(1)\ (2)	Change rod packing every 26,000 hours or 36 months.
EU 29	MACT ZZZZ/ NSPS JJJJ	Limit CH2O to 14 ppm @ 15.0% O2 (MACT ZZZZ) and 0.7 g/hp-hr VOC, 2.0 g/hp-hr CO, 1.0 g/hp-hr NOx, NSPS JJJJ	Performance test	Semiannually or Annually*
	NSPS OOOOa	Rod Packing	60.5385a(a)(1)\ (2)	Change rod packing every 26,000 hours or 36 months.
EU 30	MACT ZZZZ/ NSPS JJJJ	Limit CH2O to 14 ppm @ 15.0% O2 (MACT ZZZZ) and 0.7 g/hp-hr VOC, 2.0 g/hp-hr CO, 1.0 g/hp-hr NOx, NSPS JJJJ	Performance test	Semiannually or Annually*
	NSPS OOOOa	Rod Packing	60.5385a(a)(1)\ (2)	Change rod packing every 26,000 hours or 36 months.
EU 31	MACT ZZZZ/ NSPS JJJJ	Limit CH2O to 14 ppm @ 15.0% O2 (MACT ZZZZ) and 0.7 g/hp-hr VOC, 2.0 g/hp-hr CO, 1.0 g/hp-hr NOx, NSPS JJJJ	Performance test	Semiannually or Annually*
	NSPS OOOOa	Rod Packing	60.5385a(a)(1)\ (2)	Change rod packing every 26,000 hours or 36 months.
EU 33	NSPS OOOOa	LDAR Program Closed vent system	Method 21/OGI	Semiannually

EU 34	NSPS OOOOa	LDAR Program Closed vent system	Method 21/OGI	Semiannually
EU 36	NSPS OOOOa	95.0% DRE	60.18	Continuous
EU Pigging	NSPS OOOOa	LDAR Program	Method 21/OGI	Semiannually

* 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 emissions units:

1. Caterpillar G3516B 4SLB engine identified as Emissions Unit EU 15 in Table 2 of this permit;

2. Waukesha L5794GSI 4SRB engine identified as Emissions Unit EU 27 in Table 2 of this permit;

3. Waukesha L5794GSI 4SRB engine identified as Emissions Unit EU 28 in Table 2 of this permit;

4. Waukesha L5794GSI 4SRB engine identified as Emissions Unit EU 29 in Table 2 of this permit;

5. Waukesha L5794GSI 4SRB engine identified as Emissions Unit EU 30 in Table 2 of this permit; and

6. Waukesha L5794GSI 4SRB engine identified as Emissions Unit EU 31 in Table 2 of this permit.

The source is subject to the requirements of Subpart JJJJ. Notwithstanding conditions in this permit, the permittee shall comply with all applicable requirements of Subpart JJJJ.

OBSERVATION: Engines EU 15, EU 27, EU 28, EU 29, EU 30, and EU 31 commenced construction after June 12, 2006 and were manufactured after July 1, 2007 meeting the applicability of § 60.4230(a)(4)(i). Therefore, these engines are subject to the requirements of NSPS JJJJ.

EU 1 and EU 2 were removed from the facility in September 2021 but were assessed for compliance in this inspection report where possible.

B. General Provisions [40 CFR 60.1-19 and 40 CFR 60.4246]

1. The Facility is subject to the requirements of 40 CFR part 60, subpart A – General Provisions as specified in Table 3 of 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 must comply with the emissions standards for each engine as specified in §60.4233.

1. The Permittee must operate and maintain the engines subject to the emission standards over the entire life of the engine, as specified in §60.4234.

2. 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:

   (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: See Table 4 below for performance test results. Information provided in the performance tests shows compliance with the emission standards of Table 1 of NSPS JJJJ. The engines at Roberts Trust have been tested according to ASTM D6348-03, as required in § 60.4244.

D. Compliance Requirements [60.4243 (b), (f) and (g)]

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 manufacturers 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 manufacturers emission-related written instructions, the engine will be considered a non-certified engine and the Permittee shall demonstrate compliance according to §§60.4243(a)(2)(iii) by keeping 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, you must conduct an initial

performance test within 1 year of engine startup and conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first, thereafter to demonstrate compliance; 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 and conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first, thereafter to demonstrate compliance.

OBSERVATION: In Table 4 below EU 15 shows runtime longer than 8,760 hours before performance tests. According to an April 4, 2023 email, Targa representatives replaced an electronic control module (ECM) at EU 15 with another ECM from another engine and the operating hours did not transfer over. The following response was provided by Targa:

After reviewing the records and discussions with the technicians Targa confirmed EU-15 ceased operations on February 21, 2019. The last ECM reading of engine hours showed 27,312. At this time the original ECM was removed and placed into service at another location. The plan was for EU-15 to remain inoperable because of decreased gas volumes. As field volumes increased it was determined EU-15 needed to be restarted during the month of August 2022. A suitable ECM for EU-15 was moved from Hawkeye Compressor Station and installed. Our records indicate the last engine hours reading on the ECM for Hawkeye #2 were 48,170 hours. The operator's logs show EU-15 regained its operational status on August 19, 2022 at 48,184 hours.

Three timelines of engines EU-15, Hawkeye #2, and C-7183 and relevant events are shown below:

- ***January 8, 2019 @ 26,426 hours – EU-15 Emissions Test***
- ***February 21, 2019 @ 27,312 hours – Last Day of Operations with Original ECM***
- ***August 19, 2022 @ 48,184 hours – Start up EU-15 with new ECM from Hawkeye #2***
- ***November 14, 2022 @ 49,930 hours – Emissions Test***
- ***Total Hours Between Emissions Tests = (27,312 – 26,426) + (49,930 – 48,184) = 1,746 hrs***

Original EU-15 ECM Timeline (from EU-15 to Engine C-7183):

- ***February 21, 2019 @ 27,312 hours – Last Day of Operations with Original ECM***
- ***June 18, 2021 @ 27,953 hours – Start Up of Engine C-7183 with EU-15 ECM***

New EU-15 ECM Timeline (from Hawkeye #2 to EU-15):

- ***November 7, 2021 @ 48,170 hours – Hawkeye #2 Ceases Operation, ECM later transferred to EU-15***
- ***August 19, 2022 @ 48,184 hours – Start Up of EU-15 with New ECM from Hawkeye #2***

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).

It is expected that air-to-fuel ratio controllers will be used with the operation of three-way catalysts/non-selective catalytic reduction. The AFR controller must be maintained and operated appropriately in order to ensure proper operation of the engine and control device to minimize emissions at all times.

Area of concern: EPA would advise Targa to contain more information in the work orders to ensure operating requirements are being met. Certain work orders reviewed do not contain information regarding engine operating hours or type of maintenance conducted on the emission controls. For example, work order 165005 and 165002 does not contain the engine operating hours at the time of the maintenance conducted.

E. Testing Requirements [40 CFR 60.4244]

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

OBSERVATION: See Table 4 below for performance test results. The engines at Roberts Trust have been tested according to ASTM D6348-03, as required in § 60.4244 and Table 2 of NSPS JJJJ. Each test is conducted with a duration of 3x1 hour test runs.

Table 4: NSPS JJJJ Performance Tests

Emission Unit ID	Serial Number	Test Date	NOx (g/hp-hr)	CO (g/hp-hr)	VOC (g/hp-hr)	Engine Load (%)	Engine Runtime at Test
EU-15	JEF03086	1/8/2019	0.455	0.025	0.34	95.84	26426
EU 27	5283705414	10/13/2020	0.771	0.778	0.006	95	11256
EU 28	5283705934	10/13/2020	0.156	0.823	0.011	94	8648
EU 29	5283705415	10/15/2020	0.299	0.463	0.015	97	11034
EU 30	3193204	10/14/2020	0.307	0.636	0.019	92	8872
EU 31	5283705635	10/14/2020	0.411	0.981	0.024	93	10276
EU 27	5283705414	10/15/2021	0.85	1.502	0.32	92	17837
EU 28	5283705934	10/15/2021	0.403	0.905	0.027	90	15460
EU 29	5283705415	10/14/2021	0.541	1.33	0.24	94	17643
EU 30	3193204	10/15/2021	0.46	0.825	0.029	94	15367
EU 31	5283705635	10/26/2021	0.546	0.905	0.031	91.06	16931
EU-27	5283705414	10/11/2022	0.044	0.147	0.014	94.2	26199
EU-28	5283705934	10/11/2022	0.06	0.025	0.004	94.2	23569
EU-29	5283705415	10/12/2022	0.087	0.077	0.004	95.65	26167
EU-30	3193204	10/12/2022	0.141	0.435	0.005	95.65	23753
EU-31	5283705635	10/12/2022	0.08	0.22	0.004	95.65	24993
EU-15	JEF03086	11/14/2022	0.218	0.006	0.145	93.3	49933
EU-15	JEF03086	1/16/2023	0.224	0.015	0.283	90.84	50900

F. Notifications, Reports, and Records for Owners and Operators [40 CFR 60.4245(a), (c) and (d)]

1. The Permittee must meet all of the applicable notification, reporting, and recordkeeping requirements of §60.4245(a).

2. The Permittee shall submit initial notification as required in §60.7(a)(1) and §60.4245(c); and

3. The Permittee shall submit a copy of each performance test as conducted in §60.4244 within 60 days after the test has been completed according to §60.4245(d).

OBSERVATION: Targa submits notification of intent to conduct performance tests and submits the performance tests in a timely manner.

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(c) and (e)]

1. 40 CFR part 60, subpart OOOO (Subpart OOOO) applies to the following reciprocating compressor and

storage vessel and associated vapor combustor:

(a) Ariel JGK/4 Reciprocating Compressor associated with Caterpillar G3516B engine identified as Emissions Unit EU 15 in Table 2 of this permit.

(b) Emissions unit EU 11, in Table 2 of this permit, was constructed after August 23, 2011 and before April 12, 2013 and therefore is a Group 1 storage vessel, and the associated vapor combustor identified as EU 36.

2. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of Subpart OOOO for storage vessel and reciprocating compressor affected facilities.

OBSERVATION: EU 11 is a storage vessels that were constructed after August 23, 2011 and before April 12, 2013. The trigger dates for compliance for a Group 1 storage vessel was assessed in previous inspection reports. Additionally, the reciprocating compressor associated with EU-15 was constructed after August 23, 2011 and before September 18, 2015 and therefore is subject to NSPS OOOO.

B. 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.

C. Applicable Standards for Reciprocating Compressor Affected Facilities [40 CFR 60.5385]

The Permittee shall comply with either of the following requirements for Emissions Unit EU 15 as specified in §60.5385(a):

1. Replace the reciprocating compressor rod packing either:
   (a) Before the compressor has operated for 26,000 hours. The number of hours of operation must be continuously monitored beginning upon initial startup of the reciprocating compressor affected facility, or the date of the most recent reciprocating compressor rod packing replacement, whichever is later; or

   (b) Prior to 36 months from the date of the most recent rod packing replacement, or 36 months from the date of startup for a new reciprocating compressor for which the rod packing has not yet been replaced.

2. Collect the emissions from the rod packing using a rod packing emissions collection system which operates under negative pressure and route the rod packing emissions to a process through a closed vent system that meets the requirements of §60.5411(a).

OBSERVATION: Targa appears to comply with NSPS OOOO by complying with the requirement to replace the reciprocating compressor rod packing every 26,000 hours and does not collect emissions from rod packing. Therefore, the permit requirement regarding closed-vent systems (permit condition C.2 of this permit section) is not applicable to the operations at Roberts Trust.

Targa provided the rod packing replacement date for EU 15 of August 29, 2018 and in the 2023 NSPS OOOO report noted that 5,135 hours have past since the last rod packing replacement.

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 11, as specified in §60.5395(b) and number 2 of this section.

2. The Permittee shall comply with either of the following requirements for emissions unit EU 11 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 subject storage vessel, EU 11, at Roberts Trust is 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, EU 36.

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

1. The Permittee shall achieve initial compliance with the standards the reciprocating compressor affected facility, EU 15, according to §60.5410(c).

2. The Permittee shall demonstrate initial compliance for storage vessels EU 11 according to §60.5410(h).

3. The Permittee shall submit notification of initial compliance for the Group 1 storage vessel EU 11 according to §60.5410(i).

OBSERVATION: Targa tracks the hours of operation for the reciprocating compressor rod packing according to § 60.5410(c). Additionally, Targa determined that the VOC emissions from EU 11 are greater than 6 tpy and therefore route emissions to a control device as required in § 60.5410(h) and (i).

G. Additional Storage Vessel and Reciprocating Compressor 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 closed vent system to comply with the emission standards for reciprocating compressor, EU 15, as specified in §60.5411(a).
2. The Permittee shall meet the applicable requirements for each cover and closed vent system to comply with the emission standards for storage vessels, EU 11 and associated vapor combustor EU 26, as specified in §60.5411(b) and (c).
3. The Permittee shall meet the applicable requirements for control device, EU 36, used to comply with the

emission standards for storage vessels, EU 11, as specified in §60.5412(d).

OBSERVATION: The reciprocating compressors at Roberts Trust do not use a closed vent system and therefore section § 60.5411(a) is not applicable. EPA inspectors did not note any deficiencies in the cover and closed vent system according to § 60.5411(b) and (c).

Area of Concern: Targa did not provide records of a performance test for the control device EU 36. Targa provided performance tests for all other facilities that occurred in November 2020, including for Roberts Trust II, EU 23. EPA has concerns that the ECD at Roberts Trust I has not received a performance test as required by § 60.5412(d). The ECD at Roberts Trust I is a TriPoint series where the model has not been exempted from performance tests according to § 60.5413(d). Therefore, this control device is required to receive a performance test.

G. Performance Testing and Continuous Compliance Requirements for Storage Vessel and Reciprocating Compressor Affected Facilities [40 CFR 60.5413 and 40 CFR 60.5415]

1. The Permittee shall demonstrate that the control device, EU 36, achieves the performance requirements of reducing VOC emissions by 95.0% by weight or greater from storage vessel EU 11 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 reciprocating compressor EU 15, the storage vessel EU 11 and associated control device EU 36 according to §60.5415(c) and (e), respectively.

Area of Concern: Targa did not provide records of a performance test for the control device EU 36. Targa provided performance tests for all other facilities that occurred in November 2020, including for Roberts Trust II, EU 23. EPA has concerns that the ECD at Roberts Trust I has not received a performance test as specified in § 60.5413. The ECD at Roberts Trust I is a TriPoint series where the model has not been exempted from performance tests according to § 60.5413(d). Therefore, this control device is required to receive a performance test.

Targa appears to continually track the hours of operations for rod packing of EU 15 according to § 60.5415(c)(1).

H. Initial and Continuous Storage Vessel, Reciprocating Compressor and Cover and Closed Vent System Monitoring Requirements [40 CFR 60.5416(a)-(c) and 40 CFR 60.5417(c)-(h)]

1. The Permittee shall inspect each storage vessel and reciprocating compressor 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(a)-(c).

2. The Permittee shall meet the applicable requirements to demonstrate continuous compliance for control device, EU 36, used to meet emission standards for storage vessel, EU 11, according to §60.5417(c)-(h).

OBSERVATION: Targa provided records of the closed vent and cover monthly inspections according to § 60.5416(c) and § 60.5417(h). Additionally, Targa appears to operate a CPMS on the control device according to § 60.5417(c)-(g).

The provisions of § 60.5416(a) and (b) are not applicable to the operations at Roberts Trust.

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 reports annual NSPS OOOO and deviations as required.

Area of Concern: Targa did not report a performance test for the control device, EU 36.

J. 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 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

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

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

40 CFR part 60, subpart OOOOa (Subpart OOOOa) applies to the following emissions units:
1. Ariel JGK/4 Reciprocating Compressor associated with Emissions Unit EU 27 in Table 2 of this permit;
2. Ariel JGK/4 Reciprocating Compressor associated with Emissions Unit EU 28 in Table 2 of this permit;
3. Ariel JGK/4 Reciprocating Compressor associated with Emissions Unit EU 29 in Table 2 of this permit;
4. Ariel JGK/4 Reciprocating Compressor associated with Emissions Unit EU 30 in Table 2 of this permit;
5. Ariel JGK/4 Reciprocating Compressor associated with Emissions Unit EU 31 in Table 2 of this permit;
6. Condensate Storage Tank #2 (400 bbl) associated with Emissions Unit EU 21 in Table 2 of this Permit;
7. Condensate Storage Tank #3 (400 bbl) associated with Emissions Unit EU 33 in Table 2 of this Permit;
8. Condensate Storage Tank #4 (400 bbl) associated with Emissions Unit EU 34 in Table 2 of this Permit; and
9. Fugitive Emissions from site expansion occuring after September 18, 2015, identified as Fugitive Emissions #2 (EU24) in Table 2 of this permit.

The collection of all fugitive emissions components at the compressor station is an affected facility.
The source is subject to the requirements of Subpart OOOOa. Notwithstanding conditions in this permit, the permittee shall comply with all applicable requirements of Subpart OOOOa.

OBSERVATION: The reciprocating compressors and storage vessels listed above were constructed after September 18, 2015 and are therefore subject to NSPS OOOOa. Additionally, the control device, EU 23, controlling the emissions from the subject storage vessels is an affected unit at Roberts Trust.

B. General Compliance Requirements [40 CFR 60.5370a]

At all times, including during startup, shutdown and malfunction, the Permittee shall maintain and operate the reciprocating compressor and collection of fugitive emission components, air pollution control and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on

information available to the EPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures and inspection of the source.

OBSERVATION: The storage vessels at Roberts Trust II 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. Additionally, EPA inspectors did not see any emissions being vented from any fugitive emission sources.

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

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

1. The Permittee shall comply with either of the following requirements for each reciprocating compressor as specified in §60.5385a(a):

   (a) Replace the reciprocating compressor rod packing either:
   (i) Before the compressor has operated for 26,000 hours. The number of hours of operation must be continuously monitored beginning upon initial startup of the reciprocating compressor affected facility, or the date of the most recent reciprocating compressor rod packing replacement, whichever is later; or
   (ii) Prior to 36 months from the date of the most recent rod packing replacement, or 36 months from the date of startup for a new reciprocating compressor for which the rod packing has not yet been replaced.

   (b) Collect the emissions from the rod packing using a rod packing emissions collection system which operates under negative pressure and route the rod packing emissions to a process through a closed vent system that meets the requirements of §60.5411a(a) and (d).

2. Demonstrate initial compliance with standards that apply to reciprocating compressor affected facilities as required by §60.5410a(c).

3. Demonstrate continuous compliance with standards that apply to reciprocating compressor affected facilities as required by §60.5415a(c).

3. Perform reporting requirements as specified by §60.5420a(b)(1) and (4) and the recordkeeping as required by §§60.5420a(c)(3), (6) through (9), and (17), as applicable.

OBSERVATION: According to information provided by Targa, the rod packing for the reciprocating compressors were replaced less than 26,000 hours of operation as required by § 60.5385a(a)(1). EU 27 had the rod packing replaced on November 11, 2021, and EU 29 had the rod packing replaced on December 1, 2021. EU 28, EU 30 and EU 31 have not operated beyond 26,000 hours since initial date of startup and therefore have not been required to replace the rod packing in the reciprocating compressor.

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

The Permittee shall reduce greenhouse gases (GHG) (in the form of a limitation on emissions of methane), and VOC emissions by complying with the requirements in §§60.5397a(a)-(j) within 60 days of the start of production and monitoring quarterly thereafter the initial survey at the compressor station.

OBSERVATION: The storage vessels at Roberts Trust 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. Additionally, EPA inspectors did not see any emissions being vented from any fugitive emission sources.

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

1. The Permittee shall achieve initial compliance for each reciprocating compressor affected facility by complying with §§60.5310a(c)(1) - (4).

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

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

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

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

OBSERVATION: The reciprocating compressors, EU 27, EU 28, EU 29, EU 30 and EU 31 do not operate a closed vent system, therefore the permit requirements of § 60.5411(a) listed in this permit above, do not apply.

OBSERVATION: EPA inspectors did not document any emissions venting from the closed-vent system or any unburned hydrocarbons escaping the control device. Additionally, EPA inspectors did not see any emissions being vented from any fugitive emission sources as required by § 60.5411(b), (c), and (d).

OBSERVATION: Targa operates a control device, EU 23, to control the emissions from the storage vessels and is subject to control requirements of § 60.5412a and § 60.5413a.

Performance tests for the ECD were conducted according to Method 25A per § 60.5413a(b) on November 20, 2020. Targa elected to comply with the requirement of § 60.5412a(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: 120.3 ppmv @ 3% O2 wet basis.

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

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

OBSERVATION: Targa tracks the operating hours and time between rod packing replacement for the reciprocating compressors at Roberts Trust according to § 60.5415a(c).

The storage vessels at Roberts Trust 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. Additionally, EPA inspectors did not see any emissions being vented from any fugitive emission sources. Targa provided records of monthly AVO's at Roberts trust upon request.

Area of Concern: According to information provided by Targa in both the SIXMON and TVACC sent by Targa February 17, 2023, shown in Table 8 below, Targa exceeded the condensate throughput limit of 94,925 bbls per year. It was noted that the final throughput was 119,880 bbls by 12/31/2022. While this permit does not contain a throughput limit for condensate, the bbls per year were initially a conservative estimate for maximum throughput of condensate to Roberts Trust established by Targa. As specified in § 60.5413a(b)(5)(ii), Targa must conduct subsequent performance tests to establish a new operating limit. The ECD was not venting emissions as seen on the FLIR camera but the higher tank throughput may need to be accounted for according to § 60.5413a(b)(5)(ii) with the higher throughput estimates that Targa has established. EPA has concerns that the ECD may need to be optimized as specified by the manufacturer to account for increased throughputs.

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

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

OBSERVATION: The storage vessels at Roberts Trust 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. Targa provided records of monthly AVO's for the control device, cover and closed vent systems at Roberts trust upon request according to § 60.5416a(c).

Targa does not capture emissions from rod packing, therefore the requirements of § 60.5416a(a) and (b) do not apply.

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

1. The Permittee shall submit annual reports for reciprocating compressors affected facilities containing the information specified in §§60.5420a(b)(1), (4), (6-7), (9), and (11).

2. The Permittee shall maintain all records identified as specified in §60.7(f) and in §§60.5420a(c)(3), (6-9), and (15).

OBSERVATION: Targa provided fugitive emissions, storage vessel and reciprocating compressor rod packing replacement reports upon request. Note: Targa provided the rod packing replacement reports in the NSPS OOOO reports instead of NSPS OOOOa reports.

J. General Standards [40 CFR 60.5425a]

1. The General Provisions at 40 CFR part 60, subpart A apply as specified in Table 3 of Subpart OOOOa. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR part 60, subpart A.

2. All reports required under 40 CFR part 60, subpart A shall be sent to the EPA at the following address as listed in §60.4:

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

V. 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)]

40 CFR part 63, subpart HH (Subpart HH) applies to the following emissions units:
1. TEG Dehydration Unit identified as Emissions Unit EU 17 in Table 2 of this permit; and
2. TEG Dehydration Unit identified as Emissions Unit EU 26 in Table 2 of this permit.

The Permittee has determined that the facility, as described in the subpart, is not a major source but has actual emissions of 5 tpy or more of a single hazardous air pollutant (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.

The source is subject to the requirements of Subpart HH. Notwithstanding conditions in this permit, the permittee shall comply with all applicable requirements of Subpart HH.

OBSERVATION: Roberts Trust operates two triethylene dehydration units at an area source that is not located at any UA plus offset and UC boundary and is therefore subject to certain requirements of Part 63 Subpart HH.

Targa noted in the Roberts Trust Title V application submitted that the dehydration units have a benzene PTE greater than 1 tpy and shall comply with MACT HH by maintaining an optimum glycol recirculation rate according to § 63.764(d)(2).

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 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

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 EU 17 and EU 26 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 17 and EU 26 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 17 and EU 26 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 at Roberts Trust does not operate a control device. Targa has not reported any process changes since the 2020 permit modification. EPA inspectors recorded that the dehydration unit at Roberts Trust I, EU 17, 12 MMscfd TEG dehydration unit, operates a glycol pump, model Kimray 9020PV, was counted to pump at approximately 16 strokes per minute. The dehydration unit at Roberts Trust II EU 26, 36 MMscfd TEG dehydration unit, operates a glycol pump, model Kimray 21020PV, was counted to pump at approximately 12 strokes per minute. According to information provided from Kimray, the Kimray 9020PV has an approximate stroke rate of 0.038 gallons per stroke. Therefore, 16 strokes per minute equates roughly 0.608 gpm. The Kimray 21020PV has an approximate stroke rate of 0.109 gallons per stroke. Therefore, 12 strokes per minute equates roughly 1.308 gpm.

Emissions from both dehydration unit reboilers are routed to a tank that vents emissions to the atmosphere.

Area of Concern: EPA requested MACT HH reports to include optimum glycol circulation rate. Targa did not provide the formula and documentation calculated for the optimum glycol circulation rate as required in § 63.764(d)(2)(ii). Additionally, Targa provided ProMax reports documenting the glycol circulation rate and emissions. 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.

However, in the GLYCalc model provided in the Title V application Targa noted that both EU 17 and EU 26 shall have a glycol circulation rate of 1.50 gpm. Therefore, the onsite inspection of the glycol pumps showed that the circulation rate was below 1.50 gpm.

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 xylenes (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.

(d) Control of HAP emissions from a gas-condensate-glycol (GCG) 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 dehydration unit at Roberts Trust does not operate a control device. Targa has not reported any process changes since the 2020 permit modification. Therefore, this permit condition, Section C above, is not applicable.

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: The dehydration unit at Roberts Trust does not operate a control device, or cover or closed vent systems. Targa has not reported any process changes since the 2020 permit modification. Therefore, this permit condition, Section D.1, D.2 and D.4 above, are not applicable.

It did not appear that any process modifications occurred since the previous inspection pursuant 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 Subpart HH using the applicable test

methods and compliance procedures 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 Roberts Trust. The dehydration units at Roberts Trust do not operate with a control device.

Area of Concern: Targa used ProMax to determine benzene concentration in their recent 2022 annual reports for both EU 17 and EU 26, according to § 63.772(b)(2), the owner or operator shall determine actual average benzene or BTEX emissions using the model GRI–GLYCalcTM, Version 3.0 or higher, and the procedures presented in the associated GRI–GLYCalcTM Technical Reference Manual. Therefore, ProMax is not approved software according to § 63.772(b)(2) for determining glycol circulation rate.

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

1. For each closed-vent system or cover required for the Permittee to comply with Subpart HH, the Permittee shall comply with the inspection and monitoring requirements specified in §63.773(c).

2. For each control device required for the Permittee to comply with Subpart HH, the Permittee shall comply with the inspection and monitoring requirements as specified in §63.773(b) or §63.773(d).

OBSERVATION: The provisions of § 63.773, as listed above from permit V-TAT-000752-2019.01, do not apply to the two dehydration units operating at Roberts Trust.

G. Recordkeeping Requirements [40 CFR 63.774 and 63.7649(j)]

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 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 an urban area (UA) plus offset and urban cluster (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.

Area of Concern: Targa did not provide the optimum glycol circulation using GLYCalc as specified in § 63.774(f).

H. Reporting Requirements [40 CFR 63.775]

1. The reporting provisions of 40 CFR part 63, subpart A, that apply and those that do not apply to the Permittee are listed in Table 2 of this subpart.

2. The Permittee shall submit the information specified in §63.775(b).

3. The Permittee shall submit Notification of Compliance Status Reports as specified in §63.775(d).

4. The Permittee shall submit Periodic Reports for area sources as specified in §63.775(e).

5. The Permittee shall submit notifications of process changes as specified in §63.775(f).

6. 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-000752-2019.01, do not apply to the dehydration units operating at Roberts Trust.

OBSERVATION: Targa calculated the optimum glycol circulation rate for both dehydration units at Roberts Trust provided a ProMax glycol circulation rate during the records review which accounted for a glycol circulation rate of 1.31 gpm for EU 17 and 1.50 for EU 26. The Kimray 21020PV, was counted to pump at approximately 12 strokes per minute. According to information provided from Kimray, the Kimray 9020PV has an approximate stroke rate of 0.038 gallons per stroke. Therefore, 16 strokes per minute equates roughly 0.608 gpm. The Kimray 21020PV has an approximate stroke rate of 0.109 gallons per stroke. Therefore, 12 strokes per minute equates roughly 1.308 gpm. Both dehydration units were found to be operating below the reported gpm from the ProMax report and the initial Title V application GLYCalc report.

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]

40 CFR part 63, subpart ZZZZ (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. Caterpillar G3516B 4SLB engine identified as Emissions Unit EU 15 in Table 2 of this permit;

4. Waukesha L5794GSI 4SRB engine identified as Emissions Unit EU 27 in Table 2 of this permit;

5. Waukesha L5794GSI 4SRB engine identified as Emissions Unit EU 28 in Table 2 of this permit;

6. Waukesha L5794GSI 4SRB engine identified as Emissions Unit EU 29 in Table 2 of this permit;

7. Waukesha L5794GSI 4SRB engine identified as Emissions Unit EU 30 in Table 2 of this permit; and

8. Waukesha L5794GSI 4SRB engine identified as Emissions Unit EU 31 in Table 2 of this permit.

OBSERVATION: According to calculations provided by Targa, Roberts Trust is a major source of HAP with greater than 25 tpy total HAP. All engines operating at Roberts Trust commenced construction after December 19, 2002 and have a site rating of more than 500 hp located at a major source of HAP and are therefore new stationary RICE as specified in § 63.6590(a)(2)(i).

EU 1 and EU 2 were removed from the facility in September 2021 but were assessed for compliance in this inspection report where possible.

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 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 [40 CFR 63.6590(a)(2)(i) and 63.6595(a)]

This subpart applies to each affected source with stationary Reciprocating Internal Combustion Engines (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. EU 1, EU 2, EU 15, EU 27, EU 28, EU 29, EU 30 and EU 31 with a site rating of more than 500 brake HP located at a major source of HAP emissions after August 16, 2004 must comply with the applicable emission limitations and operating limitations of this subpart upon startup.

OBSERVATION: The engines operating at a major source are subject to MACT ZZZZ and shall comply with the regulations of this subpart upon startup.

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

1. Emissions from engines, emissions units EU 27, EU 28, EU 29, EU 30 and EU 31, are new stationary 4SRB 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. Each engine shall meet either of the following emission limitations as specified in Table 1a.1:

   (a) Reduce formaldehyde emissions by 76.0% or more; or

   (b) Limit the concentration of formaldehyde in the stationary RICE exhaust to 350 parts per million by volume, dry basis (ppmvd) or less at 15.0% oxygen (O_2).

2. Engines units EU 27, EU 28, EU 29, EU 30 and EU 31 are new stationary RICE with a site rating of more than 250 hp located at a major source of HAP emissions that uses an NSCR to comply with the emission limitations shall meet the following operating limitations for each RICE as specified in Table 1b.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 750°F and less than or equal to 1,250°F.

OBSERVATION: See Table 6 below for performance tests for EU 27, EU 28, EU 29, EU 30 and EU 31.

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

EU 27: EPA inspectors recorded 2673 instances of temperature deviations for EU 27. Which is about 3.4% of operating time errors for temperature sensor deviations.

EU 28: EPA inspectors recorded 8195 instances of temperature deviations for EU 28. Which is about 10.3% of operating time errors for temperature sensor deviations.

EU 29: EPA inspectors recorded 3889 instances of temperature deviations for EU 29. Which is about 5.1% of operating time errors for temperature sensor deviations.

EU 30: EPA inspectors recorded 3216 instances of temperature deviations for EU 30. Which is about 4.3% of operating time errors for temperature sensor deviations.

EU 31: EPA inspectors recorded 3472 instances of temperature deviations for EU 31. Which is about 4.7% of operating time errors for temperature sensor deviations.

Monthly pressure (dP) reading reviews showed that Targa missed the monthly pressure readings in February 2020 for EU 29, July 2020 for EU 28 and EU 30, September and December 2020 for all engines of this section, April 2021 for all engines of this section, June 2022 for all engines of this section, and March 2023 for all engines of this section at Roberts Trust.

Most of the temperature deviations appeared to be failures to record actual values. As noted in certain MACT ZZZZ reports for other Targa facilities but not for Roberts Trust, 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. Emission and Operating Limitations for EU 1, EU 2, and EU 15,
[40 CFR 63.6600(b), Table 2a.2 and Table 2b.1]

1. Emissions from engines, emissions units EU 1, EU 2, and EU 15 are new stationary 4SLB RICE with a site rating of more than 500 hp located at a major source of HAP emissions. Each engine shall meet either of the following emission limitations as specified in Table 2a.2:

   (a) Reduce CO emissions by 93% or more; or

   (b) Limit concentration of formaldehyde in the stationary RICE exhaust to 14 ppmvd or less at 15% O_2.

2. Emissions from engines, emissions units EU 1, EU 2, and EU 15 are new stationary 4SLB RICE with a site rating of more than 500 hp located at a major source of HAP emissions. Each engine shall meet either of the following emission limitations as specified in Table 2b.1:

   (a) Maintain your 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 your stationary RICE 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: See Table 5 below for performance tests for EU 15, no performance tests were conducted for EU 1 and EU 2 during the inspection period.

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 15: EPA inspectors recorded 10045 instances of temperature deviations for EU 15. Which is about 41.2% of operating time errors for temperature sensor deviations.

Monthly pressure (dP) reading reviews showed that Targa missed the monthly pressure readings in March 2023 for EU 15 at Roberts Trust.

Most of the temperature deviations appeared to be failures to record actual values. As noted in certain MACT ZZZZ reports for other Targa facilities but not for Roberts Trust, 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.

F. General Compliance Requirements for EU 1, EU 2, EU 15, EU 27, EU 28, EU 29, EU 30 and EU 31 [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.

G. Testing and Initial Requirements for EU 1, EU 2, EU 15, EU 27, EU 28, EU 29, EU 30 and EU 31 [40 CFR 63.6610, 63.6615, 63.6620, Table 3 and Table 4]

1. The Permittee shall conduct the initial performance test or other initial compliance demonstrations in Table 4 to this subpart that apply within 180 days after the compliance date that is specified for the stationary RICE in §63.6595 and according to the provisions in §63.7(a)(2) for emissions units EU 1, EU 2, EU 15, EU 27, EU 28, EU 29, EU 30 and EU 31, as specified in §63.6610(a).

2. The Permittee, as the owner and operator of a stationary RICE with greater than 500 hp located at a major source of HAP emissions shall comply with the chosen emission limit as specified in Section VI.E and Section VI.F of this permit for engines EU 1, EU 2, EU 15, EU 27, EU 28, EU 29, EU 30 and EU 31, by complying with the following the requirements as specified in §63.6615:

   (a) Conducting semiannual performance tests for each RICE, emissions units EU 1, EU 2, EU 15, EU 27, EU 28, EU 29, EU 30 and EU 31 as specified in Table 3.

3. 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.

4. The Permittee shall conduct each performance test in Tables 3 and 4 of this subpart that applies as specified in §63.6620(a).

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 as specified in §63.6620(b).

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: See Table 5 below for the MACT ZZZZ performance tests since 2020.

Table 5: MACT ZZZZ Performance Test Results

Unit ID	Test Date	CH2O ppmvd @ 15%	CH2O ppmvd @ 15%	Avg. Catalyst Inlet Temp. (°F)	Avg. Δ P (inches H_2O)	Average Load (% Site Rating)	Engine Runtime @ Test
EU-27	1/24/2020	350	99.42	919	3.6	91.93	7054
EU-28	1/23/2020	350	20.07	903	3.1	95.25	4203
EU-29	1/21/2020	350	52.24	921	3.7	91.64	6715
EU-30	1/21/2020	350	25.93	886	3.8	92.13	4252
EU-31	1/21/2020	350	131.08	910	3.5	92.8	6706
EU 28	6/30/2020	350	167.18	958	2	92.7	6563
EU 30	6/30/2020	350	121.58	968	4.4	93.04	6616
EU-15	11/14/2022	14	1.24	900	6.2	93.3	49933
EU-15	1/16/2023	14	2.39	942	3.4	90.84	50900

Area of Concern: Targa did not appear to conduct performance tests for EU 27, EU 28, EU 29, EU 30 and EU 31 since 2020 as required by § 63.6615 and § 63.6620.

H. Monitoring, Installation, Collection, Operation and Maintenance Requirements for EU 1, EU 2, EU 15, EU 27, EU 28, EU 29, EU 30 and EU 31 [40 CFR 63.6625(b) and (h)]

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

2. The Permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to this subpart apply as specified in §63.6625(h).

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 for other facilities but not in Roberts Trust, Targa has issues with random zeroes in the temperature data output globally for engines on the FBIR. 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. EPA inspectors also noted the engine monitoring parameters did not appear to operate properly during the onsite inspection. 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).

I. Initial Compliance Requirements for EU 1, EU 2, EU 15, EU 27, EU 28, EU 29, EU 30 and EU 31 [40 CFR 63.6630 and Table 5]

1. The Permittee, as the owner and operator of a new non-emergency stationary RICE with greater than 500 hp located at a major source of HAP emissions shall comply with the chosen emission limit by demonstrating initial compliance for each RICE according to either of the following requirements as specified in §63.6630(a):

   (a) For non-emergency 4SLB stationary RICE greater than 250 hp located at a major source of HAP, emissions units EU 1, EU 2 and EU 15, follow Table 5.1 to comply with the requirement to reduce formaldehyde emissions and using oxidation catalyst.

   (b) For non-emergency 4SRB stationary RICE greater than 500 hp located at a major source of HAP, emissions units EU 27, EU 28, EU 29, EU 30 and EU 31, follow Table 5.7 to comply with the requirement to reduce formaldehyde emissions and using NSCR.

2. The Permittee shall establish each operating limitation as specified in Table 1b.1 and Table 2b.1 during the initial performance test as specified in §63.6630(b).

OBSERVATION: See above for Targa missing performance tests and improperly functioning CPMS at Roberts Trust.

J. Continuous Compliance Requirements for EU 1, EU 2, EU 15, EU 27, EU 28, EU 29, EU 30 and EU 31 [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 Roberts Trust, the issues still persist.

2. The Permittee, as the owner and operator of a new non-emergency stationary RICE with greater than 500 hp located at a major source of HAP emissions shall comply with the chosen emission limit for EU 1, EU 2, EU 15, EU 27, EU 28, EU 29, EU 30 and EU 31 by demonstrating continuous compliance for each RICE according to either of the following requirements as specified in §63.6640(a):

   (a) For non-emergency 4SLB stationary RICE greater than 250 hp located at a major source of HAP, emissions units EU 1, EU 2, and EU 15,: Follow Table 6.1 to comply with the requirement to reduce CO emissions and using oxidation catalyst and using a CPMS.

   (b) For non-emergency 4SRB stationary RICE greater than 500 hp, emissions unit EU 27, EU 28, EU 29, EU 30 and EU 31 Follow Table 6.4 to comply with the requirement to reduce formaldehye emissions and using NSCR.

The Permittee shall report each instance where EU 1, EU 2, EU 15, EU 27, EU 28, EU 29, EU 30 and EU 31 did not meet each emission limitation, operating limitation, or requirement as specified in §63.6640(b) and (e).

Area of Concern: See above. Targa has issues with maintaining operating limits and operating parameters associated with the CPMS.

K. Notifications, Reports and Records for EU 1, EU 2, EU 15, EU 27, EU 28, EU 29, EU 30 and EU 31 [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: See Table 6below for MACT ZZZZ semiannual reports. Where Targa noted stack testing occurred but provided no record or report is highlighted in red below. EPA requested all MACT ZZZZ performance tests and only MACT ZZZZ performance tests for EU 15 were provided.

Table 6: MACT ZZZZ Semiannual Reports.

Sent	Reporting Period	Deviations	Notes
7/27/2021	1/1/2021-6/30/2021	●EU 27 was noted to have 4 malfunction events totaling 1080 minutes. (0.57% duration of deviation as % of operating time) ● EU 28 was noted to have 3 malfunction events totaling 45 minutes.(0.02% duration of deviation as % of operating time) ●EU 29 was noted to have 2 malfunction events totaling 1035 minutes.(0.60% duration of deviation as % of operating time) ●EU 30 was noted to have 3 malfunction events totaling 1050 minutes.(0.55% duration of deviation as % of operating time) ●EU 31 was noted to have 1 malfunction event totaling 1020 minutes.(0.75% duration of deviation as % of operating time) ●EU 15 did not operate.	
1/20/2022	7/1/2021-12/31/2021	●Report notes that October 2021 testing occurred however no testing has been submitted or appears to have been conducted. ●EU 27, EU 28, EU 29, EU 30, and EU 31 did not report deviations. ●EU 15 did not operate.	

7/29/2022	1/1/22-6/30/2022	EU31: The upper limit for precatalyst pressure was 4.4" H2O. On 4/15/2022 the monthly reading of 4.7" H2O was recorded. An emissions test to establish a reference point occurred on 4/29/2022, however the temperature data during the emissions test was not valid. A second emissions test occurred on 5/18/2022 with valid catalyst temperature and therefore a new reference point was established.	EU1, EU2 and EU3 were removed. EU15 did not operate during this time period. Last engine test for EU27, EU28, EU29, EU30, EU31 was October 2021. CMS Certification/Audit was October 2021.
7/29/2022	1/1/22-6/30/2022	●From 7:58 on February 25, 2022 through 20:51 on February 27, 2022 (3,653 total minutes) for engine EU27. ●From 8:13 on February 25, 2022 through 20:51 on February 27, 2022 (3,638 total minutes) for engines EU28, EU29, EU30 and EU31. ● From 14:58 on March 16, 2022 through 15:13 on March 16, 2022 (15 total minutes) for engines EU28, EU29, EU30 and EU31. ●From 0:00 on April 28, 2022 through 13:29 on May 6, 2022 (12,326 total minutes) for engine EU31. ●For each occurrence above, there were multiple malfunctions periods of recorded temperature that displayed 0°F for EU27, EU28, EU29, EU30 and EU31. ●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: EU27 (1.50%), EU28 (1.56%), EU29 (1.43%), EU30 (1.49%), EU31 (6.48%).	
2/17/2023	7/1/2022-12/31/2022	EU15 had a dP deviation greater than 2 inches of H2O. ●All engines had less than 1% deviation time vs operating time besides EU15 which had approximately 29% deviation as operating time.	dP went out for EU-15 12/4/2022. Catalyst replaced afterwards. Stack test to get new dP baseline occurred 1/20/22

Area of Concern: EPA has concerns that what Targa has reported regarding deviations at Roberts Trust is not an accurate reporting for the operations at Roberts Trust. EPA recorded more deviations regarding temperature, catalyst pressure recordings being skipped or CPMS missing data downtime, in addition to Targa not conducting MACT ZZZZ performance tests for the subject engines at Roberts Trust.

III. 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: Most records requested from EPA inspectors were provided by Targa. See MACT HH for more information.

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

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

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

2. "Deviation" means any situation in which an emissions unit fails to meet a permit term or condition. A deviation is not always a violation. A deviation can be determined by observation or through review of data obtained from any testing, monitoring, or recordkeeping established in accordance with §71.6(a)(3)(i) and (a)(3)(ii). For a situation lasting more than 24 hours which constitutes a deviation, each 24-hour period is considered a separate deviation. Included in the meaning of deviation are any of the following:

   (a) A situation where emissions exceed an emission limitation or standard;

   (b) A situation where process or emissions control device parameter values indicate that an emission limitation or standard has not been met; or

   (c) A situation in which observations or data collected demonstrate noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit.

3. The Permittee shall promptly report to the EPA deviations from permit requirements, including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. "Prompt" is defined as follows:

(a) Any definition of "prompt" or a specific time frame for reporting deviations provided in an underlying applicable requirement as identified in this permit.

(b) Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations will be submitted based on the following schedule:

(i) For emissions of a HAP or a toxic air pollutant (as identified in the applicable regulation) that continue for more than 1 hour in excess of permit requirements, the report shall be made within 24 hours of the occurrence.

(ii) For emissions of any regulated air pollutant, excluding a HAP or a toxic air pollutant that continues for more than two (2) hours in excess of permit requirements, the report shall be made within 48 hours.

(iii) For all other deviations from permit requirements, the report shall be submitted with the semi-annual monitoring report.

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

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

OBSERVATION: Targa submits forms according to this permit requirement. See Table 8 below for TVACC and SIXMON reports.

IV. 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 GHG fee adjustment for any source that has initiated an activity listed in table at §71.9(c)(8) since the fee was last paid. The GHG fee adjustment shall be equal to the set fee provided in the table at §71.9(c)(8) for each activity that has been initiated since the fee was last paid.

   (c) The Permittee shall exclude the following emissions from the calculation of fees:

      (i) The amount of actual emissions of each regulated pollutant (for fee calculation) that the source emits in excess of 4,000 tpy;

      (ii) Actual emissions of any regulated pollutant (for fee calculation) already included in the fee calculation; and
      (iii) The quantity of actual emissions (for fee calculation) of insignificant activities [defined in 40 CFR 71.5(c)(11)(i)] or of insignificant emissions levels from emissions at the source identified in the Permittee's application pursuant to 40 CFR 71.5(c)(11)(ii).

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

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

8. The Permittee shall retain fee calculation worksheets and other emissions-related data used to determine fee payment for 5 years following submittal of fee payment. [Emission-related data include, for example, emissions-related forms provided by the EPA and used by the Permittee for fee calculation

purposes, emissions-related spreadsheets, and emissions-related data, such as records of emissions monitoring data and related support information required to be kept in accordance with 40 CFR 71.6(a)(3)(ii).]

9. Failure of the Permittee to pay fees in a timely manner shall subject the Permittee to assessment of penalties and interest in accordance with 40 CFR 71.9(l).

10. When notified by the EPA of underpayment of fees, the Permittee shall remit full payment within 30 days of receipt of notification.

11. A Permittee who thinks an EPA-assessed fee is in error and who wishes to challenge such fee, shall provide a written explanation of the alleged error to the EPA along with full payment of the EPA assessed fee.

OBSERVATION: The following annual emissions reports and annual fees have been submitted prior to April 1 each year as required for Roberts Trust.

Table 7: Fee year and annual actual emissions

Fee Year	NOx	VOC	SO_2	PM_{10}	HAP Total	Fee Paid
2020	41.2	84.7	0.1	2.8	9.1	$6,930.73
2021	30.6	32.2	0.1	1.8	3.9	$3,857.38
2022	7.13	59.88	0.16	4.36	6.06	$4,698.85

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 TVACC and SIXMON reports as shown below in Table 8.

Table 8: SIXMON and TVACC reports

Sent	Report Type	Reporting Period	Deviations	Notes

1/20/2022	SIXMON	10/1/2021- 12/31/2021	No deviations reported	EU1, EU2 and EU3 were removed.
7/29/2022	SIXMON	1/1/2022- 6/30/2022	EU31: The upper limit for precatalyst pressure was 4.4" H2O. On 4/15/2022 the monthly reading of 4.7" H2O was recorded. An emissions test to establish a reference point occurred on 4/29/2022, however the temperature data during the emissions test was not valid. A second emissions test occurred on 5/18/2022 with valid catalyst temperature and therefore a new reference point was established.	EU15 did not operate during this time period.
2/17/2023	SIXMON	7/1/2022- 12/31/2022	●EU22 had greater than 94,925 bbl through the end of the year. Greater than conservative PTE calculations in Title V application modification. ●Permit term: VI.B.2(c). EU22 had 119,880 bbl throughput by the end of the year. Greater than conservative (94,925 bbl/yr) PTE calculations in Title V application modification. ●Permit term: VI.E.2(a). dP went out for EU-15 12/4/2022. Catalyst replaced TBDXXXX Stack test to get new dP baseline occured 1/20/22	
2/17/2023	TVACC	1/1/2022- 12/31/2022	●EU31: The upper limit for precatalyst pressure was 4.4" H2O. On 4/15/2022 the monthly reading of 4.7" H2O was recorded. An emissions test to establish a reference point occurred on 4/29/2022, however the temperature data during the emissions test was not valid. A second emissions test occurred on 5/18/2022 with valid catalyst temperature and therefore a new reference point was established. ●EU22 had greater than conservative PTE calculations in Title V application modification. ●Permit term: VI.B.2(c). EU22 had 119,880 bbl througput by the end of the year. Greater than conservative (94,925 bbl/yr) PTE calculations in Title V application modification. ●Permit term: VI.E.2(a). dP went out for EU-15 12/4/2022. Catalyst replaced TBDXXXX Stack test to get new dP baseline occured 1/20/22"	

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

1. The Permittee shall furnish to the EPA, within a reasonable time, any information that the EPA may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the EPA copies of records that are required to be kept pursuant to the terms of the permit, including information claimed to be confidential. Information claimed to be confidential must be accompanied by a claim of confidentiality according to the provisions of 40 CFR part 2, subpart B.

2. The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information. In addition, a Permittee shall provide additional information as necessary to address any requirements that become applicable after the date a complete application is filed, but prior to release of a draft permit.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1. Corrects typographical errors;

2. Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;

3. Requires more frequent monitoring or reporting by the Permittee;

4. Allows for a change in ownership or operational control of a source where the EPA determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittee has been submitted to the EPA;

5. Incorporates into the Part 71 permit the requirements from preconstruction review permits authorized under an EPA-approved program, provided that such a program meets procedural requirements substantially equivalent to the requirements of 40 CFR 71.7 and 71.8 that would be applicable to the change if it were subject to review as a permit modification, and compliance requirements substantially equivalent to those contained in 40 CFR 71.6; or

6. Incorporates any other type of change which the EPA has determined to be similar to those listed in (1) through (5) above.

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

OBSERVATION: An administrative amendment was submitted to correct the reporting date in condition VII.B.1 from the initial permit the day the initial permit was finalized, October 1, 2021. This was minor in nature and was corrected by the EPA on October 4, 2021.

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

1. The Permittee may request the use of minor permit modification procedures only for those modifications that:

   (a) Do not violate any applicable requirement;

   (b) Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

   (c) Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;

   (d) Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:

      (i) A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I; and
      (ii) An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the CAA;

   (e) Are not modifications under any provision of Title I of the CAA; and

   (f) Are not required to be processed as a significant modification.

2. Notwithstanding the list of changes ineligible for minor permit modification procedures in 1 above, minor permit modification procedures may be used for permit modifications involving the use of

economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in an applicable implementation plan or in applicable requirements promulgated by the EPA.

3. An application requesting the use of minor permit modification procedures shall meet the requirements of 40 CFR 71.5(c) and shall include the following:

   (a) A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;

   (b) The source's suggested draft permit;

   (c) Certification by a responsible official, consistent with 40 CFR 71.5(d), that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and

   (d) Completed forms for the permitting authority to use to notify affected states as required under 40 CFR 71.8.

4. The source may make the change proposed in its minor permit modification application immediately after it files such application. After the source makes the change allowed by the preceding sentence, and until the permitting authority takes any of the actions authorized by 40 CFR 71.7(e)(1)(iv)(A) through (C), the source must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time period, the source need not comply with the existing permit terms and conditions it seeks to modify. However, if the source fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it.

5. The permit shield under 40 CFR 71.6(f) may not extend to minor permit modifications.

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

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

1. The Permittee must request the use of significant permit modification procedures for those modifications that:

   (a) Do not qualify as minor permit modifications or as administrative amendments;

   (b) Are significant changes in existing monitoring permit terms or conditions; or

   (c) Are relaxations of reporting or recordkeeping permit terms or conditions.

2. Nothing herein shall be construed to preclude the Permittee from making changes consistent with Part 71 that would render existing permit compliance terms and conditions irrelevant.

3. Permittees must meet all requirements of Part 71 for applications, public participation, and review by affected states and tribes for significant permit modifications. For the application to be determined complete, the Permittee must supply all information that is required by 40 CFR 71.5(c) for permit issuance and renewal, but only that information that is related to the proposed change.

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

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

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

1. Additional applicable requirements under the CAA become applicable to a major Part 71 source with a remaining permit term of three or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to 40 CFR 71.7(c)(3);

2. Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the EPA, excess emissions offset plans shall be deemed to be incorporated into the permit;

3. The EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or

4. The EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

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

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

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

1. Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow the EPA or an authorized representative to perform the following:

   (a) Enter upon the Permittee's premises where a Part 71 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

   (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

   (c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

   (d) As authorized by the CAA, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

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

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

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

The Permittee is allowed to make certain changes without a permit revision, provided that the following

requirements are met, and that all records required by this section are kept for a period of 5 years:

1. Each change is not addressed or prohibited by this permit;

2. Each change shall meet with all applicable requirements and shall not violate any existing permit term or condition;

3. Changes under this provision may not include changes subject to any requirement of 40 CFR parts 72 through 78 or modifications under any provision of Title I of the CAA;

4. The Permittee must provide contemporaneous written notice to the EPA of each change, except for changes that qualify as insignificant activities under 40 CFR 71.5(c)(11). The written notice must describe each change, the date of the change, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change;

5. The permit shield does not apply to changes made under this provision;

6. The Permittee must keep a record describing all changes that result in emissions of any regulated air pollutant subject to any applicable requirement not otherwise regulated under this permit, and the emissions resulting from those changes;

7. The notice shall be kept on site and made available to the EPA on request, in accordance with the general recordkeeping provision of this permit; and

8. Submittal of the written notice required above shall not constitute a waiver, exemption, or shield from applicability of any applicable standard or PSD permitting requirements under 40 CFR 52.21 that would be triggered by the change.

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

1. This permit shall expire upon the earlier occurrence of the following events:

   (a) Five (5) years elapse from the date of issuance; or

   (b) The source is issued a Part 70 or Part 71 permit under an EPA-approved or delegated permit program.

2. Expiration of this permit terminates the Permittee's right to operate unless a timely and complete permit renewal application has been submitted at least 6 months but not more than 18 months prior to the date of expiration of this permit.

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

4. The Permittee's failure to have a Part 71 permit is not a violation of this part until the EPA takes final action on the permit renewal application. This protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit any additional information identified as being needed to process the application by the deadline specified in writing by the EPA.

5. Renewal of this permit is subject to the same procedural requirements that apply to initial permit issuance, including those for public participation, affected state, and tribal review.

6. The application for renewal shall include the current permit number, description of permit revisions and off permit changes that occurred during the permit term, any applicable requirements that were promulgated and not incorporated into the permit during the permit term, and other information required by the application form.

APPENDIX A: Site Overview

APPENDIX B: Photo Log

File Name	Description	Photographer
None		