

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

**Inspection Date:** June 15, 2023

**Inspection Report Date:** August 1, 2023

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

**Tribal Representatives:** None

**Company Representatives:** [REDACTED]  
[REDACTED]

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

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

**Last Inspection:** August 18, 2020

**Operating Status:** Operating

**Applicable Requirements:** 40 CFR Part 60, Subpart JJJJ: Standards of Performance for New  
Stationary Spark Ignition Internal Combustion Engines (NSPS  
JJJJ)  
40 CFR Part 60, Subpart 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)

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Permit Number: V-TAT-000611-2017.01  
Replaces Permit No.: V-TAT-000611-2017.00

Issue Date: February 10, 2021  
Effective Date: February 10, 2021  
Expiration Date: December 17, 2023

**Facility Information and Emission Unit Identification**

Parent Company Name: Targa Badlands, LLC (Targa)  
Mailing Address: 1939 125<sup>th</sup> Avenue NW, Watford City, North Dakota 58854  
Facility Contact: [REDACTED], Senior Environmental Specialist  
[REDACTED]  
Facility Operator & Name: Targa – Johnson Compressor Station (Johnson)  
Facility Location: Latitude 47.73527, Longitude -102.64221  
County, State: McKenzie County, North Dakota  
Reservation: Fort Berthold Indian Reservation  
Tribe: Three Affiliated Tribes  
Responsible Official: [REDACTED], VP Operations  
SIC Code: 1311 – Crude Petroleum and Natural Gas  
AFS ID: 38-053-00169  
Other CAA Permits: There are no other CAA permits for this facility.

### **Enforcement History**

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

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

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

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

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

### **Inspection Findings/Areas of Concern**

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

1. The enclosed combustion device (ECD) was continuously venting unburned hydrocarbon emissions as seen on the FLIR camera (MOV 0317.mp4). EPA inspectors looked through the site glass and confirmed that no burners were lit on the approximately 10 burner array on the Tripoint ECD (Serial number: 82068). A pilot was visible however tank emissions were seen via FLIR exiting the ECD stack. Tank emissions did not appear to be combusted by the pilot light via FLIR or sight-glass. EPA inspectors noted the temperature on the control panel for the ECD was 73°F.
2. There were various emissions detected via FLIR that appeared to be venting from a regulator and another that was too large to pinpoint the exact location. Details are in the NSPS OOOOa section of this inspection report.
3. During the records review, Targa provided NSPS OOOOa reports documenting the monitoring surveys that take place at Johnson. Targa reported that no leaks were discovered during any IR surveys in 2021 or 2022 (shown below) however Targa provided reports in SIXMON and TVACC reports that suggest leaks were found.
4. Targa reported in the Johnson SIXMON and TVACC sent on January 31, 2023 that it discovered a leak on the reciprocating compressor on EU-41 on October 25, 2022 and did not repair the leak until January 13, 2023. Targa made no attempt at repair within 30 calendar days as specified in § 60.5397a(h)(1) and § 60.5397a(h)(2). The repair was not fixed for 80 days after the monitoring survey.
5. Targa calculated the optimum glycol circulation rate for Johnson provided to the EPA on June 28, 2021 detailing the optimum rate was used 1.22 gpm as calculated by equation found in MACT HH § 63.764(d)(2). Targa also provided a ProMax glycol circulation rate during the records review which accounted for a glycol circulation rate of 1.10 gpm. According to information provided from Kimray, the Kimray 21020PV has an approximate stroke rate of 0.109 gallons per stroke. Therefore, 12 strokes per minute equates roughly 1.32 gpm, which is greater than Targa calculated in their MACT HH and ProMax reports.
6. 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.
7. EU 1 and EU 41 should have been complying with MACT ZZZZ requirements no later than October 15, 2021. According to information provided by Targa, EU 1 and EU 41 operating at Johnson did not comply with monitoring requirements to install temperature probes or pressure tubing. EU 1 had the monitoring equipment installed on May 26, 2022. EU 41 had the monitoring equipment installed March 22, 2022. Therefore, EU 1 operated without CPMS for 223 days and EU 41 operated without CPMS for 159 days.
8. There are additional MACT ZZZZ concerns regarding the CPMS system and reporting requirements. See the MACT ZZZZ section below. EPA does not have records of Targa submitting any MACT ZZZZ semiannual reports.
9. EPA inspectors requested information from Targa that was not provided.

### **Compliance Assistance**

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

## **Description of Operations**<sup>1</sup>

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

Natural gas that exits the separator flows to two compressor engines (emissions units EU 1 and EU 41 in Table 2 below) which compress the gas before it enters a triethylene glycol (TEG) dehydration unit (emissions unit EU 42 in Table 2 below). The compressed natural gas enters emissions unit EU 42 and is bubbled up through lean TEG in a process vessel called a contactor. During this process, water vapor is removed from the gas to a concentration determined by a sales contract. The pipeline quality natural gas then exits the contactor, is metered and then routed off site. The rich TEG exits the contactor and is depressurized in a TEG flash tank. The emissions from the flash tank are routed to the atmosphere. The depressurized TEG is routed to and regenerated using heat in a vessel called a glycol reboiler. Methanol is injected at different points to the rich TEG to prevent hydrates from forming. The vapors from the reboiler are also routed to the atmosphere. The regenerated lean TEG is circulated back to the contactor.

## **General Inspection Observations and Commentary**

EPA representatives [REDACTED], met with Targa representatives at Johnson Compressor Station (Johnson) operated by Targa at 1:25 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 [REDACTED] informed Targa representatives that the environmental manager would receive lists of questions to assist in the records review portion regarding the operations at Johnson.

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

1. Engine 1 is a rental unit that runs sporadically. It was off during the time of inspection however records show that it was running the day prior to the inspection.
2. A previously used TEG dehydration unit was still onsite but EPA inspectors visually noted that the unit was completely disconnected from the gas stream. The piping has been disconnected and the unit cannot run without major facility modifications.

The following observations were taken during the facility walkthrough:

1. The enclosed combustion device (ECD) was continuously venting unburned hydrocarbon emissions as seen on the FLIR camera (MOV\_0317.mp4). EPA inspectors looked through the site glass and confirmed that no burners were lit on the approximately 10 burner array on the Tripoint ECD (Serial number: 82068). A pilot was visible however tank emissions were seen via FLIR exiting the ECD stack. Tank emissions did not appear to be combusted by the pilot light via FLIR or sight-glass. EPA inspectors noted the temperature on the control panel for the ECD was 73°F.
2. EPA inspectors observed continuous emissions from an inlet control valve that vented outside of the engine shed for ENG-1. These emissions were associated with the regulator which also was venting emissions as shown in FLIR video (MOV\_0318.mp4).
3. EPA inspectors observed continuous, moderate emissions from a location on the right side of ENG-1 in the compressor shed. The emissions were too large to pinpoint the exact location of the venting. The

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<sup>1</sup> The description of operations provided here is a modified excerpt from the process description from the Title V Permit, V-TAT-000611-2017.01.

emissions were shown on FLIR between the engine liquid level controller through the 2<sup>nd</sup>/3<sup>rd</sup> stage of compression piping of ENG-1 (MOV\_0319.mp4). Emissions were picked up by the GMAP vehicle.

4. The dehydration unit at Johnson operates a glycol pump, model Kimray 21020PV, and was counted to pump at approximately 12 strokes per minute. Emissions from the dehydration unit reboiler are routed to a tank that vents emissions to the atmosphere. There are odors associated with the reboiler emissions that are vented to atmosphere.

Targa calculated the optimum glycol circulation rate for Johnson provided to the EPA on June 28, 2021 detailing the optimum rate was used 1.22 gpm as calculated by equation found in MACT HH § 63.764(d)(2). Targa also provided a 2022 ProMax glycol circulation rate during the records review which accounted for a glycol circulation rate of 1.10 gpm. According to information provided from Kimray, the Kimray 21020PV has an approximate stroke rate of 0.109 gallons per stroke. Therefore, 12 strokes per minute equates roughly 1.32 gpm, which is greater than Targa calculated in their MACT HH and ProMax reports.

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 2, EU 41, | April, 2016          | Model: L5794GSI                   | 32                     | 32                     | 0.0                    | 87              | 38590           |
| ENG 1, EU 1,  | No nameplate visible | Model: L5794GSI<br>SN: 5283705655 | Engine off             | Engine off             | Engine off             | Engine off      | Engine off      |
| EGEN, EU 52,  | No nameplate visible | NA                                | Not monitored by Targa | Not monitored by Targa | Not monitored by Targa | 17              | 16121           |

\* 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 for temperature and pressure across the catalyst. Targa representatives discussed that Targa receives daily updates on these parameters remotely. It is unclear if the parameters are monitored remotely and can also shut down the engine remotely if a monitoring parameter is not met.

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, [REDACTED] discussed the ECD emissions, the emissions seen venting via FLIR from ENG-1 compressor shed from both the regulator and the moderate emissions seen between the liquid level controller and the 2<sup>nd</sup>/3<sup>rd</sup> stage of compression on the right side of ENG-1. [REDACTED] also discussed engine monitoring parameters that do not appear to be monitored onsite, and that [REDACTED] will be requesting information via email about certain operating parameters.

EPA inspectors drove the GMAP vehicle through certain areas of the facility which recorded ambient conditions of multiple pollutants including total VOC (TVOC) and benzene emissions. A full report of the

GMAP records and canister samples 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 2:13 PM. An email to request relevant compliance-related information and records was sent to [REDACTED] prior to the onsite inspection on June 13, 2023. [REDACTED] provided the requested information to EPA via email on July 14, 2023.

### **Potential to Emit (PTE)**

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

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

**Table 1: Potential to Emit in Tons Per Year (tpy)  
Targa Johnson**

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

| EU                                           | EPN | Equipment Description            | Criteria Pollutant Emissions (tpy) |      |       |                 |                  |                   | Total HAP |
|----------------------------------------------|-----|----------------------------------|------------------------------------|------|-------|-----------------|------------------|-------------------|-----------|
|                                              |     |                                  | NO <sub>x</sub>                    | CO   | VOC   | SO <sub>2</sub> | PM <sub>10</sub> | PM <sub>2.5</sub> |           |
| Equipment                                    |     |                                  |                                    |      |       |                 |                  |                   |           |
| 1                                            | 1   | Caterpillar G3516LE              | 25.9                               | 24.1 | 6.7   | <0.1            | 0.4              | 0.4               | 4.4       |
| 4                                            | 4   | Tank Heater                      | 0.2                                | 0.1  | <0.1  | <0.1            | <0.1             | <0.1              | <0.1      |
| 6                                            | FUG | Fugitive Emissions               | -                                  | -    | 8.1   | -               | -                | -                 | 2.8       |
| 7                                            | 45  | Produced Water Tank <sup>1</sup> | -                                  | -    | -     | -               | -                | -                 | -         |
| 8                                            | 8   | Methanol Storage Tank            | -                                  | -    | <0.1  | -               | -                | -                 | <0.1      |
| 9                                            | 45  | Condensate Tank #1 <sup>1</sup>  | -                                  | -    | -     | -               | -                | -                 | -         |
| 10                                           | 10  | Produced Water Loading Losses    | -                                  | -    | <0.1  | -               | -                | -                 | <0.1      |
| 11                                           | 11  | Condensate Loading Losses        | -                                  | -    | 2.5   | -               | -                | -                 | 0.2       |
| 14                                           | 14  | Pneumatic Pumps                  | -                                  | -    | 38.7  | -               | -                | -                 | 1.9       |
| 15                                           | 15  | Coolant Tank #1                  | -                                  | -    | <0.1  | -               | -                | -                 | <0.1      |
| 16                                           | 16  | Coolant Tank #2                  | -                                  | -    | <0.1  | -               | -                | -                 | <0.1      |
| 17                                           | 17  | Lube Oil Tank #1                 | -                                  | -    | <0.1  | -               | -                | -                 | <0.1      |
| 18                                           | 18  | Lube Oil Tank #2                 | -                                  | -    | <0.1  | -               | -                | -                 | <0.1      |
| 19                                           | 19  | TEG Tank                         | -                                  | -    | <0.1  | -               | -                | -                 | <0.1      |
| Existing Equipment Total                     |     |                                  | 26.0                               | 24.2 | 56.2  | <0.1            | 0.5              | 0.5               | 9.3       |
| Equipment                                    |     |                                  |                                    |      |       |                 |                  |                   |           |
| 21                                           | 45  | Produced Water Tank <sup>1</sup> | -                                  | -    | -     | -               | -                | -                 | -         |
| 22                                           | 22  | Produced Water Loading Losses    | -                                  | -    | <0.1  | -               | -                | -                 | <0.1      |
| 23                                           | 23  | PIG Launchers/Receivers          | -                                  | -    | 2.8   | -               | -                | -                 | 0.4       |
| 24                                           | FUG | Fugitive Emissions               | -                                  | -    | 25.2  | -               | -                | -                 | 5.5       |
| 26                                           | 26  | Methanol Storage Tank            | -                                  | -    | <0.1  | -               | -                | -                 | <0.1      |
| 27                                           | 27  | Methanol Storage Tank            | -                                  | -    | <0.1  | -               | -                | -                 | <0.1      |
| 37                                           | 37  | Doosan/PSI FPSIB21.9NGP          | 4.9                                | 9.8  | 3.9   | <0.1            | 0.5              | 0.5               | <0.1      |
| 41                                           | 41  | Waukesha L5794GSI                | 13.3                               | 26.7 | 10.0  | <0.1            | 1.0              | 1.0               | 0.8       |
| 42                                           | 42  | Dehy Process Vents               | -                                  | -    | 29.4  | -               | -                | -                 | 1.3       |
| 44                                           | 44  | Glycol Reboiler                  | 0.2                                | 0.1  | <0.1  | <0.1            | <0.1             | <0.1              | 8.2       |
| 45                                           | 45  | Vapor Combustor                  | <0.1                               | 0.3  | 12.0  | <0.1            | -                | -                 | <0.1      |
| 46                                           | 46  | Condensate Loading Losses        | -                                  | -    | 8.4   | -               | -                | -                 | 0.8       |
| 47                                           | 45  | Condensate Tank #2 <sup>1</sup>  | -                                  | -    | -     | -               | -                | -                 | 0.4       |
| 52                                           | 52  | PSI NG Generator Engine          | 2.9                                | 5.8  | 2.4   | <0.1            | 0.4              | 0.4               | -         |
| Proposed Equipment Total                     |     |                                  | 21.4                               | 42.7 | 94.2  | <0.1            | 1.8              | 1.8               | 0.6       |
| Facility Total                               |     |                                  | 47.4                               | 66.9 | 150.4 | <0.1            | 2.3              | 2.3               | 17.9      |
| Part 71 Potential to Emit Total <sup>2</sup> |     |                                  | 47.4                               | 66.9 | 117.1 | <0.1            | 2.3              | 2.3               | 27.2      |

### **Federally Enforceable Requirements and Compliance Status**

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

### A. Facility Emission Points

Table 2 – Emissions Units and Emissions-Generating Activities

| Emissions Unit ID | Description                                                                                                                                                                                                                                                                                 | Control Equipment                          |
|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|
| EU 1              | Caterpillar G3516LE, 10.12 MMBtu/hr*, 1340 hp*, 4SLB* Natural Gas Compressor Engine:<br><br>Serial Number: WPW02218                      Installed: 8/21/2011<br>Manufactured: 5/1/2008<br><br>Ariel JGK/4 Reciprocating Compressor Serial Number: F- 27023                                 | None                                       |
| EU 4              | Tank Heater, 0.5 MMBtu/hr                                                                                                                                                                                                                                                                   | (IEU)                                      |
| EU 6<br>EU 24     | Fugitive Emissions from valves, pump seals, connectors, flanges.                                                                                                                                                                                                                            | None                                       |
| EU 7              | 400 bbl Produced Water Tank                                                                                                                                                                                                                                                                 | Enclosed Combustor EU 45 (not enforceable) |
| EU 8              | 1,000 gal Methanol Storage Tank                                                                                                                                                                                                                                                             |                                            |
| EU 9              | 400 bbl* Condensate Storage Tank                                                                                                                                                                                                                                                            | Enclosed Combustor EU 45 (not enforceable) |
| EU 11             | Condensate Loading                                                                                                                                                                                                                                                                          | None                                       |
| EU 14             | Pneumatic Pumps                                                                                                                                                                                                                                                                             | None                                       |
| EU 15             | 500 gal Coolant Tank                                                                                                                                                                                                                                                                        | None (IEU)                                 |
| EU 16             | 500 gal Coolant Tank                                                                                                                                                                                                                                                                        | None (IEU)                                 |
| EU 17             | 500 gal Lube Oil Tank                                                                                                                                                                                                                                                                       | None (IEU)                                 |
| EU 18             | 500 gal Lube Oil Tank                                                                                                                                                                                                                                                                       | None (IEU)                                 |
| EU 19             | 500 gal TEG Tank                                                                                                                                                                                                                                                                            | None (IEU)                                 |
| EU 21             | 400 bbl Produced Water Tank                                                                                                                                                                                                                                                                 | EU 45                                      |
| EU 23             | PIG Launchers and Receivers                                                                                                                                                                                                                                                                 | None                                       |
| EU 26<br>EU 27    | Two 2,000 gal Methanol Storage Tanks                                                                                                                                                                                                                                                        | None                                       |
| EU 37             | Power Solutions International, Inc, FPSIB21.9NGP, 5.31 MMBtu/hr, 507 hp, 4SRB Natural Gas Powered Generator for facility electric power generation:<br><b>Removed from the facility</b><br>Serial Number: EEIOH303183                      Installed: 10/15/2018<br>Manufactured: 3/19/2014 | NSCR                                       |
| EU 41             | Waukesha L5794GSI, 11.67 MMBtu/hr, 1,380 hp, 4SRB Natural Gas Compressor Engine:<br><br>Serial Number: 5283705655                      Installed: 10/15/2018<br>Manufactured: 4/1/2018<br><br>Ariel JGK/4 Reciprocating Compressor Serial Number: F- 56112                                  | NSCR                                       |
| EU 42             | TEG Dehydration Unit, 12.0 Mscf, emissions from dehydrator process vents:                                                                                                                                                                                                                   | None                                       |

|                                  |                                                                                                                                                                                                                      |                                               |
|----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|
| EU 44                            | Installed: 10/15/2018<br>Heater for Glycol Reboiler on EU 42, 0.375 MMBtu/hr                                                                                                                                         | None                                          |
| EU 45                            | LEED Vapor Combustor, enclosed combustor:<br>Model No. L30-0011-00 Installed: 10/15/2018                                                                                                                             | None<br>(emissions unit is a control device)  |
| EU 10<br>EU 11<br>EU 22<br>EU 46 | Miscellaneous Loading Losses                                                                                                                                                                                         | None                                          |
| EU 47                            | 400 bbl Condensate Tank                                                                                                                                                                                              | Enclosed Combustor EU 45<br>(not enforceable) |
| EU 52                            | Doosan 11.1L 1800 Turbo D111TIC, 4.20 MMBtu/hr, 268 hp, 4SRB Natural Gas Powered Generator for facility electric power generation:<br>Serial Number: EEIOH404205 Installed:<br>10/17/2020<br>Manufactured: 10/7/2014 | NSCR                                          |

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

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

**Table 3: Requirements for Emission Units**

| Equipment     | Applicable Requirements | Limitations                                                                                                                                         | Monitoring       |                           |
|---------------|-------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|------------------|---------------------------|
|               |                         |                                                                                                                                                     | Method           | Interval                  |
| EU 1          | MACT ZZZZ/ NSPS JJJ     | Limit CH <sub>2</sub> O to 14 ppm @ 15.0% O <sub>2</sub> (MACT ZZZZ) and, 1.0 g/hp-hr VOC, 4.0 g/hp-hr CO, 3.0 g/hp-hr NO <sub>x</sub> , (NSPS JJJ) | Performance test | Semiannually or Annually* |
| EU 4          | None                    | NA                                                                                                                                                  | NA               | NA                        |
| EU 6<br>EU 24 | NSPS OOOOa              | LDAR Program                                                                                                                                        | Method 21/OGI    | Semiannually              |
| EU 7          | None                    | NA                                                                                                                                                  | NA               | NA                        |
| EU 8          | None                    | NA                                                                                                                                                  | NA               | NA                        |
| EU 9          | NSPS OOOOa              | LDAR Program<br>Closed vent system                                                                                                                  | Method 21/OGI    | Semiannually              |
| EU 11         | NSPS OOOOa              | LDAR Program                                                                                                                                        | Method 21/OGI    | Semiannually              |
| EU 14         | NA                      | NA                                                                                                                                                  | NA               | NA                        |
| EU 21         | NSPS OOOOa              | LDAR Program<br>Closed vent system                                                                                                                  | Method 21/OGI    | Semiannually              |

|                                                   |                      |                                                                                                                                                      |                          |                                                       |
|---------------------------------------------------|----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------------------------------------------------------|
| EU 23                                             | NSPS OOOOa           | LDAR Program                                                                                                                                         | Method 21/OGI            | Semiannually                                          |
| EU 26<br>EU 27                                    | NA                   | NA                                                                                                                                                   | NA                       | NA                                                    |
| <del>EU 37</del> <b>Removed from the facility</b> | MACT ZZZZ/ NSPS JJJJ | Limit CH <sub>2</sub> O to 14 ppm @ 15.0% O <sub>2</sub> (MACT ZZZZ) and, 1.0 g/hp-hr VOC, 4.0 g/hp-hr CO, 3.0 g/hp-hr NO <sub>x</sub> , (NSPS JJJJ) | Performance test         | Semiannually or Annually*                             |
| EU 41                                             | MACT ZZZZ/ NSPS JJJJ | Limit CH <sub>2</sub> O to 14 ppm @ 15.0% O <sub>2</sub> (MACT ZZZZ) and 1.0 g/hp-hr VOC, 4.0 g/hp-hr CO, 3.0 g/hp-hr NO <sub>x</sub> , (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 42                                             | MACT HH              | Maintain optimum glycol circulation rate                                                                                                             | 63.764(d)(2)             | Continuously maintain optimum glycol circulation rate |
| EU 44                                             |                      |                                                                                                                                                      |                          |                                                       |
| EU 45                                             | MACT ZZZZ            | Limit CH <sub>2</sub> O to 14 ppm @ 15.0% O <sub>2</sub>                                                                                             | Performance test         | Semiannually or Annually*                             |
| EU 47                                             | NSPS OOOOa           | LDAR Program<br>Closed vent system                                                                                                                   | Method 21/OGI            | Semiannually                                          |
|                                                   |                      | Control emissions through EU 45                                                                                                                      | 60.18 flare requirements | Continuous                                            |
| EU 52                                             | NSPS JJJJ            | NO <sub>x</sub> = 1.0 g/hp-hr<br>CO = 2.0 g/hp-hr<br>VOC = 0.7 g/hp-hr                                                                               | Performance test         | Initial                                               |

\* 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)]**

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

1. Caterpillar G3516LE engine identified as Emission Unit EU 1 in Table 2 of this permit;
2. Power Solutions International, Inc, FPSIB21.9NGP engine identified as Emission Unit EU 37 in Table 2 of this permit;

3. Waukesha L5794GSI engine identified as Emission Unit EU 41 in Table 2 of this permit; and
4. Doosan 11.1L 1800 Turbo engine identified as Emission Unit EU 52 in Table 2 of this permit.
5. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of Subpart JJJJ.

**OBSERVATION: Engines EU 1, EU 41 and EU 52 commenced construction and were manufactured after the applicability dates of § 60.4230(a)(4) therefore these engines are subject to the requirements of NSPS JJJJ.**

**EPA inspectors noted the Caterpillar engine, EU 1 was not running at the time of inspection. Onsite notes provided by Targa show that the engine ran the day before the onsite inspection.**

**EU 37 has either not been installed or was removed prior to the previous inspection and therefore was not assessed for compliance in this inspection report. EPA inspectors requested information regarding the date of removal for EU 37 and Targa did not provide a response.**

**B. General Provisions [40 CFR 60.1-19]**

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

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

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

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

1. 1.0 gram per horsepower-hour (g/HP-hr) for NO<sub>x</sub>;
2. 2.0 g/HP-hr for CO; and
3. 0.7 g/HP-hr for 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 Johnson have been tested according to ASTM D6348-03, as required in § 60.4244.**

**D. Compliance Requirements [60.4243(b) and 60.4244, as applicable]**

The Permittee, as the owner and operator of stationary SI ICE that must comply with the emission standards

specified in Section II.C. of this permit, shall demonstrate compliance according to one of the methods specified in paragraphs 1 or 2 of this section, as applicable:

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

As an owner or operator of a stationary SI internal combustion engine greater than 25 HP and less than or equal to 500 HP, the Permittee shall keep a maintenance plan and records of conducted maintenance and shall, to the extent practicable, maintain and operate the engine(s) 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.

**OBSERVATION: See Table 4 below for performance test results. EU 52 is an engine with greater than 25 hp and less than 500 hp, therefore only an initial performance test is required to demonstrate compliance with § 60.4243(a)(2)(ii). Even though an initial performance test is the only requirement, Table 4 below shows multiple performance tests. This is due to multiple like-kind replacements also triggering the requirement of an initial performance test, shown by the change in serial number for EU 52 during tests that took place on March 4, 2021, March 2, 2022, July 7, 2022. EU 52 was tested again on February 22, 2023 because according to information provided by Targa via email on April 4, 2023, EU-52 underwent mechanical repairs. Additionally, according to information in the April 4, 2023 email Targa responded that:**

*“During the performance test, which was representative of normal operating conditions, the highest achievable load for the emergency generator was below the target load window (100% load  $\pm$  10%) and was averaged at 24%. As such, the operation of the emergency generator will be constrained to within  $\pm$  10% of the load achieved during the most recent performance test. Should site conditions change so that the highest achievable load is no longer representative of the testing conditions, the engine will be retested.”*

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

**OBSERVATION:** See Table 4 below for performance test results. EU 1 and EU 41 are each engines with greater than 500 hp, and therefore are required to conduct performance tests every 8,760 hours or every 3 years, whichever comes first.

**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 416142 for RE-702 does not describe the specific engine at Johnson, nor does it contain the engine operating hours at the time of the maintenance conducted.

#### **F. Testing Requirements**[60.4244 and 60.4245(d)]

For each performance test required, the Permittee shall comply with the procedures as specified in §60.4244(a)-(f) and submit performance tests results according to §60.4245(d).

**OBSERVATION:** See Table 4 below for performance test results. The engines at Johnson 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 Test Results**

| Emission Unit ID | Serial Number | Test Date  | NO <sub>x</sub> (g/hp-hr) | CO (g/hp-hr) | VOC (g/hp-hr) | Average Load (%) | Engine Operating Hours |
|------------------|---------------|------------|---------------------------|--------------|---------------|------------------|------------------------|
| EU-41            | 5283705655    | 11/17/2020 | 0.581                     | 0.437        | 0.007         | 90               | 17284                  |
| EU-1             | WPW02218      | 12/9/2020  | 0.723                     | 0.026        | 0.094         | 92               | 1400                   |
| EU-52            | EEIOH302861   | 3/4/2021   | 0.218                     | 0.3          | 0.079         | 92               | 29543                  |
| EU 1             | WPW02218      | 12/23/2021 | 1.107                     | 0            | 0.06          | 90               | 7832                   |
| EU 41            | 5283705655    | 12/23/2021 | 0.75                      | 1.535        | 0.12          | 91               | 26590                  |
| EU-52            | EEIOH302491   | 3/2/2022   | 0.089                     | 0.435        | 0.038         | 93.78            | 34724                  |
| EU-52            | EEIOH404013   | 7/7/2022   | 0.064                     | 0.521        | 0.029         | 90               | 8764                   |
| EU 1             | WPW02218      | 8/11/2022  | 0.502                     | 0.014        | 0.042         | 84.82            | 10181                  |
| EU-41            | 5284705655    | 10/10/2022 | 0.508                     | 0.493        | 0.017         | 94.2             | 32938                  |
| EU-52            | EEIOH404013   | 2/22/2023  | 0.015                     | 0.051        | 0.012         | 24               | 13422                  |

#### **G. Notifications, Reports and Records for Owners and Operators** [40 CFR 60.4245(a) and (d)]

1. The permittee shall keep records of all notifications and supporting documentation submitted to comply with this subpart;
2. The Permittee shall keep all records of maintenance conducted;
3. The Permittee shall keep all documentation pertaining to engine certification from the manufacturer for emission unit; and
4. The Permittee shall maintain all documentation showing the non-certified engine meets emission standards.

5. For each performance test required, the Permittee shall comply with the procedures as specified in §60.4244(a)-(f) and submit performance tests results according to §60.4245(d).

**OBSERVATION: Targa submitted records of startup and performance tests according to these requirements.**

**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. For example, work order 416142 for RE-702 does not describe the specific engine at Johnson, nor does it contain the engine operating hours at the time of the maintenance conducted.**

**II. 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), (e) and (j)]**

40 CFR part 60, subpart OOOOa applies to the following reciprocating compressor, storage vessel and associated vapor combustor:

1. The reciprocating compressor, Ariel JGK/4, on emissions unit EU 41.
2. The storage tank, emissions units EU 47 and associated vapor combustor, emissions unit 45.
3. The collection of all fugitive emissions components at the compressor station is an affected facility.

Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR part 60, subpart OOOOa for well and reciprocating compressor affected facilities.

**OBSERVATION: Due to the construction and installation dates of the storage tank EU 47 and the vapor combustor EU 45, and the reciprocating compressor associated with engine EU 41, these units are subject to NSPS OOOOa.**

**B. General Compliance Requirements [40 CFR 60.5370a]**

At all times, including during startup, shutdown and malfunction, the Permittee shall maintain and operate any affected facility including 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. The provisions for exemption from compliance during periods of startup, shutdown and malfunctions provided for in 40 CFR 60.8(c) do not apply to this subpart.

**OBSERVATION: EPA inspectors did detect emissions using optical gas imaging during the onsite inspection.**

**Area of Concern: The enclosed combustion device (ECD) was continuously venting unburned hydrocarbon emissions as seen on the FLIR camera (MOV\_0317.mp4). EPA inspectors looked through the site glass and confirmed that no burners were lit on the approximately 10 burner array on the Tripoint ECD (Serial number: 82068). A pilot was visible however tank emissions were seen via FLIR exiting the ECD stack. Tank emissions did not appear to be combusted by the pilot light via FLIR or**

sight-glass. EPA inspectors noted the temperature on the control panel for the ECD stack temperature was 73°F.

EPA inspectors observed continuous emissions from an inlet control valve that routed the emissions also to the outside of the engine shed for ENG-1, EU 1. These emissions were associated with the regulator inside the engine shed which also was venting emissions as shown in FLIR video (MOV\_0318.mp4).

EPA inspectors observed continuous, moderate emissions from a location on the right side of ENG-1, EU 1 in the compressor shed. The emissions were too large in scale as seen on the FLIR to pinpoint the exact location of the venting. The emissions were shown on FLIR between the engine liquid level controller through the 2nd/3rd stage of compression piping of ENG-1 (MOV\_0319.mp4). Emissions were also picked up by the GMAP vehicle.

**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, EU 41, 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).

**OBSERVATION: Targa complies with this requirement by replacing the rod packing before the compressor has operated for 26,000 hours according to § 60.5385(a)(1). Targa provided reports showing the compressor had the last rod packing replaced on July 22, 2021.**

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

**OBSERVATION: Targa complies with this requirement by replacing the rod packing before the compressor has operated for 26,000 hours according to § 60.5385(a)(1). Targa provided reports showing the compressor had the last rod packing replaced on July 22, 2021. Targa appears to track the reportable operating time for EU 41.**

**D. VOC Emissions Standards for Storage Vessel Affected Facilities** [40 CFR 60.5395a (a)-(c)]

1. The Permittee shall comply with the VOC standards and control requirements below for EU 47 and control device EU 45 as specified in §60.5395a(a) and (b)(1):
  - (a) Determine the potential to emit (PTE) for VOC emissions from EU 47 by using a generally accepted model or calculation methodology, based on the maximum average daily throughput determined for a 30-day period of production prior to the applicable emission determination deadline specified in this subsection, and
  - (b) Reducing the VOC emissions by 95.0% by weight by routing EU 47 emissions through the control device EU 45 within 60 days after startup.
  - (c) Alternatively, to paragraph (a) and (b) listed above, the Permittee may 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 §60.5395a(a)(3).
2. The Permittee shall comply with the requirements for storage vessels that are removed from service or returned to service according to §60.5395a(c).

**OBSERVATION: The closed vent system for the storage vessels appeared to be operating without detectable emissions. Performance tests for the ECD were conducted according to Method 25A per § 60.5413a(b) on November 19, 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: 31.4 ppmv @ 3% O<sub>2</sub> wet basis.**

**Area of Concern: The enclosed combustion device (ECD) was continuously venting unburned hydrocarbon emissions as seen on the FLIR camera (MOV\_0317.mp4). EPA inspectors looked through the site glass and confirmed that no burners were lit on the approximately 10 burner array on the Tripoint ECD (Serial number: 82068). A pilot was visible however tank emissions were seen via FLIR exiting the ECD stack. Tank emissions did not appear to be combusted by the pilot light via FLIR or sight-glass. EPA inspectors noted the temperature on the control panel for the ECD stack temperature was 73°F.**

**E. 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.

**Area of Concern: During the records review, Targa provided NSPS OOOOa reports documenting the monitoring surveys that take place at Johnson. Targa reported that no leaks were discovered during any IR surveys in 2021 or 2022 (shown below) however Targa provided reports in SIXMON and TVACC reports that suggest leaks were found, seen in Table 7 below.**

| Identification of Each Affected Facility<br>(\$60.5420a(b)(1)(ii))<br>(Select from dropdown list) | Date of Survey<br>(\$60.5420a(b)(7)(ii)(A)) | Do you need to report<br>fugitives found during the<br>survey?<br>(\$60.5420a(b)(7)(ii)(D))<br>(Select from dropdown list) | Monitoring Instrument Used<br>(\$60.5420a(b)(7)(ii)(B)) | Deviations From Monitoring Plan<br>Elements Under §60.5397a(c)(1), (2),<br>(7), and (8)(i)<br>or Statement that There Were No<br>Deviations From These Monitoring<br>Plan Elements<br>(\$60.5420a(b)(7)(ii)(C)) |
|---------------------------------------------------------------------------------------------------|---------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Targa Resources Johnson Compressor Station                                                        | 10/20/20                                    | no                                                                                                                         | GF320 FLIR                                              | There were no deviations from the monitoring pan                                                                                                                                                                |
| Targa Resources Johnson Compressor Station                                                        | 01/25/21                                    | no                                                                                                                         | GF320 FLIR                                              | There were no deviations from the monitoring pan                                                                                                                                                                |
| Targa Resources Johnson Compressor Station                                                        | 04/20/20                                    | no                                                                                                                         | GF320 FLIR                                              | There were no deviations from the monitoring pan                                                                                                                                                                |
| Targa Resources Johnson Compressor Station                                                        | 07/26/21                                    | no                                                                                                                         | GF320 FLIR                                              | There were no deviations from the monitoring pan                                                                                                                                                                |
| Targa Resources Johnson Compressor Station                                                        | 11/05/21                                    | no                                                                                                                         | GF320 FLIR                                              | There were no deviations from the monitoring pan                                                                                                                                                                |
| Targa Resources Johnson Compressor Station                                                        | 02/25/22                                    | no                                                                                                                         | GF320 FLIR                                              | There were no deviations from the monitoring pan                                                                                                                                                                |
| Targa Resources Johnson Compressor Station                                                        | 05/28/22                                    | no                                                                                                                         | GF320 FLIR                                              | There were no deviations from the monitoring pan                                                                                                                                                                |
| Targa Resources Johnson Compressor Station                                                        | 08/05/22                                    | no                                                                                                                         | GF320 FLIR                                              | There were no deviations from the monitoring pan                                                                                                                                                                |

**Area of Concern:** Targa reported in the Johnson SIXMON and TVACC sent on January 31, 2023 that it discovered a leak on the reciprocating compressor on EU-41 on October 25, 2022 and did not repair the leak until January 13, 2023. Targa made no attempt at repair within 30 calendar days as specified in § 60.5397a(h)(1) and § 60.5397a(h)(2). Targa stated a new communications system was recently enacted by Targa to assist in scheduling preventative maintenance, according to information provided via email on April 4, 2023 regarding another repair that was not fixed within 30 days at a different Targa facility. The repair was not fixed for 80 days after the monitoring survey.

EPA inspectors observed continuous emissions from an inlet control valve that routed the emissions also to the outside of the engine shed for ENG-1, EU 1. These emissions were associated with the regulator inside the engine shed which also was venting emissions as shown in FLIR video (MOV\_0318.mp4).

EPA inspectors observed continuous, moderate emissions from a location on the right side of ENG-1, EU 1 in the compressor shed. The emissions were too large in scale as seen in the FLIR to pinpoint the exact location of the venting. The emissions were shown on FLIR between the engine liquid level controller through the 2nd/3rd stage of compression piping of ENG-1 (MOV\_0319.mp4). Emissions were also picked up by the GMAP vehicle.

**F. Initial Compliance Requirements for Reciprocating Compressor , Storage Vessel and Fugitive Emission Components Affected Facilities [40 CFR 60.5410a(c), (h) and (j)]**

1. The Permittee shall achieve initial compliance for each reciprocating compressor affected facility, EU 41, by complying with §§60.5310a(c)(1) - (4).
2. The Permittee shall demonstrate initial compliance for storage vessel, EU 47, according to §60.5410a(h).
3. 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:** Targa achieved initial compliance for both reciprocating compressors, storage vessels and fugitive emissions at startup for the subject emission units prior to the previous inspection at Johnson, therefore this permit requirement was not addressed in this inspection report. Targa appears to

track and continuously monitor the number of hours of operation of the rod packing on the reciprocating compressor associated with EU 41 according to § 60.5410a(c). Targa also provided reports of monthly AVO's conducted at Johnson for the cover and closed vent systems.

**OBSERVATION:** Targa has developed a fugitive emissions monitoring survey, conducted an initial survey, maintains records and notes repairs according to § 60.5410a(j).

**H. Additional Requirements for Initial Compliance for Covers and Closed Vent Systems for Reciprocating Compressors and Storage Vessels [40 CFR 60.5411a]**

1. To comply with the emission standards for reciprocating compressors, EU 41, the Permittee shall meet the applicable requirements for each cover and closed vent system in §§60.5411a(a) and (d).
2. To comply with the emission standards for storage vessels, EU 47, the Permittee shall meet the applicable requirements for each cover and closed vent system in §§60.5411a(b), (c) and (d).

**OBSERVATION:** Targa achieved initial compliance for both reciprocating compressors, storage vessels and fugitive emissions at startup for the subject emission units prior to the previous inspection at Johnson, therefore this permit requirement was not addressed in this inspection report. Targa also provided reports of monthly AVO's conducted at Johnson for the cover and closed vent systems.

**OBSERVATION:** The closed vent system for the storage vessels appeared to be operating without detectible emissions. Performance tests for the ECD were conducted according to Method 25A per § 60.5413a(b) on November 19, 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:** 31.4 ppmv @ 3% O<sub>2</sub> wet basis.

**Area of Concern:** The enclosed combustion device (ECD) was continuously venting unburned hydrocarbon emissions as seen on the FLIR camera (MOV\_0317.mp4). EPA inspectors looked through the site glass and confirmed that no burners were lit on the approximately 10 burner array on the Tripoint ECD (Serial number: 82068). A pilot was visible however tank emissions were seen via FLIR exiting the ECD stack. Tank emissions did not appear to be combusted by the pilot light via FLIR or sight-glass. EPA inspectors noted the temperature on the control panel for the ECD stack temperature was 73°F.

**H. Additional Requirements for Initial Compliance for Control Devices for Storage Vessel Affected Facilities [40 CFR 60.5412a]**

To comply with the emission standards for each storage vessel, EU 47, the Permittee shall meet the applicable requirements for each control device, EU 45, as specified in §60.5412a(d).

**OBSERVATION:** The closed vent system for the storage vessels appeared to be operating without detectible emissions. Performance tests for the ECD were conducted according to Method 25A per § 60.5413a(b) on November 19, 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: 31.4 ppmv @ 3% O2 wet basis.**

**Area of Concern:** The enclosed combustion device (ECD) was continuously venting unburned hydrocarbon emissions as seen on the FLIR camera (MOV\_0317.mp4). EPA inspectors looked through the site glass and confirmed that no burners were lit on the approximately 10 burner array on the Tripoint ECD (Serial number: 82068). A pilot was visible however tank emissions were seen via FLIR exiting the ECD stack. Tank emissions did not appear to be combusted by the pilot light via FLIR or sight-glass. EPA inspectors noted the temperature on the control panel for the ECD stack temperature was 73°F.

**I. Performance Testing Procedures for Control Devices to Demonstrate Compliance at Storage Vessel Affected Facilities [40 CFR 60.5213a(d)]**

The Permittee shall demonstrate that the control device, EU 45, achieves the performance requirements of reducing VOC emissions by 95.0% by weight or greater from EU 47 using the performance test methods and procedures specified in this section according to §60.5413a.

**OBSERVATION:** The closed vent system for the storage vessels appeared to be operating without detectible emissions. Performance tests for the ECD were conducted according to Method 25A per § 60.5413a(b) on November 19, 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: 31.4 ppmv @ 3% O2 wet basis.**

**Area of Concern:** The enclosed combustion device (ECD) was continuously venting unburned hydrocarbon emissions as seen on the FLIR camera (MOV\_0317.mp4). EPA inspectors looked through the site glass and confirmed that no burners were lit on the approximately 10 burner array on the Tripoint ECD (Serial number: 82068). A pilot was visible however tank emissions were seen via FLIR exiting the ECD stack. Tank emissions did not appear to be combusted by the pilot light via FLIR or sight-glass. EPA inspectors noted the temperature on the control panel for the ECD stack temperature was 73°F.

**J. Continuous Compliance Requirements for Reciprocating Compressor, Storage Vessel and Fugitive Emissions Components Affected Facilities [40 CFR 60.5415a(c), (e), and (h)]**

1. The Permittee shall demonstrate continuous compliance for each reciprocating compressor, EU 41, according to §60.5415a(c).
2. The Permittee shall demonstrate continuous compliance with the standards for storage vessel affected facilities, EU 47, according to §60.5415a(e).
4. The Permittee shall demonstrate continuous compliance for each collection of fugitive emission components according to §60.5415a(h).

**OBSERVATION:** Targa complies with this requirement by replacing the rod packing before the compressor has operated for 26,000 hours according to § 60.5385a(a)(1). Targa provided reports showing the compressor had the last rod packing replaced on July 22, 2021. Targa appears to track the reportable operating time for EU 41 as specified in § 60.5415a(c).

**OBSERVATION:** Pursuant to § 60.5415a(e) and § 60.5415a(h), Targa provided reports of monthly

**AVO's and OGI survey reports conducted at Johnson for the cover and closed vent systems.**

**Area of Concern:** During the records review, Targa provided NSPS OOOOa reports documenting the monitoring surveys that take place at Johnson. Targa reported that no leaks were discovered during any IR surveys in 2021 or 2022 (shown below) however Targa provided reports in SIXMON and TVACC reports that suggest leaks were found, seen in Table 7.

| Identification of Each Affected Facility<br>(\$60.5420a(b)(1)(ii))<br>(Select from dropdown list) | Date of Survey<br>(\$60.5420a(b)(7)(ii)(A)) | Do you need to report fugitives found during the survey?<br>(\$60.5420a(b)(7)(ii)(D))<br>(Select from dropdown list) | Monitoring Instrument Used<br>(\$60.5420a(b)(7)(ii)(B)) | Deviations From Monitoring Plan Elements Under §60.5397a(c)(1), (2), (7), and (8)(i) or Statement that There Were No Deviations From These Monitoring Plan Elements<br>(\$60.5420a(b)(7)(ii)(C)) |
|---------------------------------------------------------------------------------------------------|---------------------------------------------|----------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Targa Resources Johnson Compressor Station                                                        | 10/20/20                                    | no                                                                                                                   | GF320 FLIR                                              | There were no deviations from the monitoring pan                                                                                                                                                 |
| Targa Resources Johnson Compressor Station                                                        | 01/25/21                                    | no                                                                                                                   | GF320 FLIR                                              | There were no deviations from the monitoring pan                                                                                                                                                 |
| Targa Resources Johnson Compressor Station                                                        | 04/20/20                                    | no                                                                                                                   | GF320 FLIR                                              | There were no deviations from the monitoring pan                                                                                                                                                 |
| Targa Resources Johnson Compressor Station                                                        | 07/26/21                                    | no                                                                                                                   | GF320 FLIR                                              | There were no deviations from the monitoring pan                                                                                                                                                 |
| Targa Resources Johnson Compressor Station                                                        | 11/05/21                                    | no                                                                                                                   | GF320 FLIR                                              | There were no deviations from the monitoring pan                                                                                                                                                 |
| Targa Resources Johnson Compressor Station                                                        | 02/25/22                                    | no                                                                                                                   | GF320 FLIR                                              | There were no deviations from the monitoring pan                                                                                                                                                 |
| Targa Resources Johnson Compressor Station                                                        | 05/28/22                                    | no                                                                                                                   | GF320 FLIR                                              | There were no deviations from the monitoring pan                                                                                                                                                 |
| Targa Resources Johnson Compressor Station                                                        | 08/05/22                                    | no                                                                                                                   | GF320 FLIR                                              | There were no deviations from the monitoring pan                                                                                                                                                 |

**Area of Concern:** Targa reported in the Johnson SIXMON and TVACC sent on January 31, 2023 that it discovered a leak on the reciprocating compressor on EU-41 on October 25, 2022 and did not repair the leak until January 13, 2023. Targa made no attempt at repair within 30 calendar days as specified in § 60.5397a(h)(1) and § 60.5397a(h)(2). Targa stated a new communications system was recently enacted by Targa to assist in scheduling preventative maintenance, according to information provided via email on April 4, 2023 regarding another repair that was not fixed within 30 days at a different Targa facility. The repair was not fixed for 80 days after the monitoring survey.

EPA inspectors observed continuous emissions from an inlet control valve that routed the emissions also to the outside of the engine shed for ENG-1, EU 1. These emissions were associated with the regulator inside the engine shed which also was venting emissions as shown in FLIR video (MOV\_0318.mp4).

EPA inspectors observed continuous, moderate emissions from a location on the right side of ENG-1, EU 1 in the compressor shed. The emissions were too large in scale to pinpoint the exact location of the venting. The emissions were shown on FLIR between the engine liquid level controller through the 2nd/3rd stage of compression piping of ENG-1 (MOV\_0319.mp4). Emissions were also picked up by the GMAP vehicle.

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

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

**OBSERVATION: The permit conditions listed above for NSPS OOOOa, § 60.5416a(a) and § 60.5416a(b) do not apply at Johnson.**

**The conditions of § 60.5416a(c) apply for cover and closed vent system inspection for storage vessel affected facilities apply. Targa provided reports of monthly AVO's and OGI survey reports conducted at Johnson for the cover and closed vent systems.**

**L. Continuous Control Device Monitoring Requirements for Storage Vessel Affected Facilities [40 CFR 60.5417a(a)-(h)]**

The Permittee shall meet the applicable requirements of §60.5417a(a)-(h) to demonstrate continuous compliance for the control device, EU 45, used to meet emission standards for the storage vessel EU 47.

**OBSERVATION: The permit conditions listed above for NSPS OOOOa, § 60.5417a(a) through § 60.5417a(h) do not apply at Johnson.**

**The conditions of § 60.5417a(h) apply for control devices used to comply with emission reduction standards for storage vessel affected facilities apply. Targa provided reports of monthly AVO's and OGI survey reports conducted at Johnson for the control device at Johnson.**

**M. 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), and (9-12).
2. The Permittee shall maintain all records identified for reciprocating compressor and storage vessel affected facilities as specified in §60.7(f) and in §§60.5420a(c)(3), (5-9), (12-15) and (17) as applicable.

**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.**

**N. General Standards [40 CFR 60.5425a]**

1. The General Provisions at 40 CFR part 60, subpart A apply as specified in Table 3 of 40 CFR part 60, subpart OOOOa. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR part 60, subpart A.
2. All reports required under 40 CFR part 60, subpart A shall be sent to the EPA either via EPA's Compliance and Emissions Data Reporting Interface (CEDRI) as specified in §60.5420a or 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

Reports may be submitted on electronic media or via email to:  
[R8AirReportsEnforcement@epa.gov](mailto:R8AirReportsEnforcement@epa.gov).

**III. National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production**

## **Facilities - 40 CFR Part 63, Subpart HH**

### **A. Applicability [40 CFR 63.760(a)-(d)]**

1. 40 CFR part 63, subpart HH (Subpart HH) applies to the TEG Dehydrator identified as emissions unit EU 42 in Table 2 of this permit;
2. The Permittee has determined that EU 42 it is not a major source but has actual emissions of 5 tpy or more of a single HAP, or 12.5 tpy or more of a combination of HAP (i.e., 50% of the major source thresholds), and shall update its major source determination within 1 year of the prior determination, and each year thereafter, using gas composition data measured during the preceding 12 months.
3. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of Subpart HH for affected sources located at an area source of HAP.

**OBSERVATION: Targa noted in the Johnson Title V application submitted October 15, 2019 that the dehydration unit, EU 42, has 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

Reports may be submitted on electronic media or via email to:  
[R8AirReportsEnforcement@epa.gov](mailto:R8AirReportsEnforcement@epa.gov).

3. The Permittee shall comply with the following requirements for the small glycol dehydrator at an area source as specified in §63.764(d)(2):
  - (a) Determine the optimum glycol circulation rate using the formula specified in §63.764(d)(2)(i);
  - (b) Operate EU 42 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 42 is 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 42 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 Johnson operates a glycol pump, model Kimray 21020PV, and was counted to pump at approximately 12 strokes per minute. Emissions from the dehydration unit reboiler is routed to a tank that vents emissions to the atmosphere. There are odors associated with the reboiler emissions that are vented to atmosphere.**

**Area of Concern: Targa calculated the optimum glycol circulation rate for Johnson provided to the EPA on June 28, 2021 detailing the optimum rate was used 1.22 gpm as calculated by equation found in MACT HH § 63.764(d)(2). Targa also provided a ProMax glycol circulation rate during the records review which accounted for a glycol circulation rate of 1.10 gpm. According to information provided from Kimray, the Kimray 21020PV has an approximate stroke rate of 0.109 gallons per stroke. Therefore, 12 strokes per minute equates roughly 1.32 gpm, which is greater than Targa calculated in their MACT HH and ProMax reports. Targa is required to maintain the optimum glycol circulation rate and submit determination in accordance with MACT HH and the permit conditions above if there is a change to the optimum glycol circulation rate using GLYCalc.**

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

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

1. Except as specified in §63.765(c), the Permittee shall comply with the applicable requirements for small glycol dehydration unit process vents at area sources of HAP specified in §63.765(b)(1) and (2).
  - (a) For each small glycol dehydration process vent, the Permittee shall control air emissions by limiting benzene, toluene, ethylbenzene and 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.

- (c) 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 provisions of § 63.765(b) and (c), as listed above from permit V-TAT-000611-2017.01, do not apply to dehydration unit EU 42 operating at Johnson.**

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

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

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

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

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

The Permittee shall determine compliance with the requirements of Subpart HH using the applicable test methods and compliance procedures for small glycol dehydration units specified in §63.772.

1. The Permittee shall determine the glycol dehydration unit flowrate, benzene emissions or BTEX emissions as specified in §63.772(b).
2. The Permittee shall comply with the test procedures for no detectable emissions in accordance with Method 21, 40 CFR part 60, appendix A, as specified in §63.772(c).
3. The Permittee shall comply with the test procedures and compliance demonstrations for small glycol dehydration units as specified in §63.772(d).
4. The Permittee shall comply with the test procedures for control device performance, as necessary, as specified in §63.772(e).
5. The Permittee shall comply with the compliance demonstration for control device performance requirements, as necessary, as specified in §63.772(f).

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

**Area of Concern: Targa used ProMax to determine benzene concentration in their recent 2022 annual report, according to § 63.772(b)(2), the owner or operator shall determine actual average benzene or BTEX emissions using the model GRI-GLYCalc™, Version 3.0 or higher, and the procedures**

presented in the associated GRI–GLYCalc™ Technical Reference Manual. Therefore, ProMax is not approved software according to § 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 by 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, as necessary, required by the Permittee to comply with Subpart HH, the Permittee shall comply with the inspection and monitoring requirements as specified in §63.773(d).

**OBSERVATION: The provisions of § 63.773, as listed above from permit V-TAT-000611-2017.01, do not apply to dehydration unit EU 42 operating at Johnson.**

**G. Recordkeeping Requirements** [40 CFR 63.774]

1. The recordkeeping provisions of 40 CFR part 63, subpart A, that apply and those that do not apply to the Permittee are listed in Table 2 of 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 plus offset and urban cluster boundary as specified in §63.774(f).
6. The Permittee shall maintain records, pursuant to §63.774(g), of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment) or the air pollution control equipment and monitoring equipment. The Permittee shall maintain records of actions taken during periods of malfunction to minimize emissions in accordance with § 63.764(j), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

**OBSERVATION: The provisions of § 63.774(c), as listed above from permit V-TAT-000611-2017.01, do not apply to dehydration unit EU 42 operating at Johnson.**

**Targa provided records satisfying the requirements of §§ 63.774(b), (f) and (g), where requested.**

**H. Reporting Requirements** [40 CFR 63.775]

1. The reporting provisions of subpart A of Part 63, that apply and those that do not apply to the Permittee are listed in Table 2 of Subpart HH.
2. The Permittee shall submit the information for area sources specified in §63.775(c).
3. The Permittee shall submit Notification of Compliance Status Reports as specified in §63.775(d).

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).
5. The Permittee shall comply with any applicable electronic reporting provisions specified at §63.775(g).

**OBSERVATION: The provisions of § 63.775(e) and (g), as listed above from permit V-TAT-000611-2017.01, do not apply to dehydration unit EU 42 operating at Johnson.**

**Area of Concern: Targa calculated the optimum glycol circulation rate for Johnson provided to the EPA on June 28, 2021 detailing the optimum rate was used 1.22 gpm as calculated by equation found in MACT HH § 63.764(d)(2). Targa also provided a ProMax glycol circulation rate during the records review which accounted for a glycol circulation rate of 1.10 gpm. According to information provided from Kimray, the Kimray 21020PV has an approximate stroke rate of 0.109 gallons per stroke. Therefore, 12 strokes per minute equates roughly 1.32 gpm, which is greater than Targa calculated in their MACT HH and ProMax reports.**

**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.**

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

**A. Applicability [40 CFR 63.6585(b)]**

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

1. Caterpillar engine identified as emissions unit EU 1 in Table 2 of this permit;
2. Power Solutions International, Inc, FPSIB21.9NGP engine identified as Emission Unit EU 37 in Table 2 of this permit;
3. Waukesha L5794GSI engine identified as emission unit EU 41 in Table 2 of this permit; and
4. Doosan 11.1L 1800 Turbo engine identified as emissions unit EU 52 in Table 2 of this permit.

**OBSERVATION: According to Targa, EU 1 and EU 41 are both engines at a major source of HAP emissions with a site rating of more than 500 hp each and commenced construction after December 19, 2002. Therefore, EU 1 and EU 41 are affected facilities of MACT ZZZZ as specified in § 63.6590(a)(2)(i).**

**OBSERVATION: EU 37 has either not been installed or was removed prior to the previous inspection and therefore was not assessed for compliance in this inspection report. EPA inspectors requested information regarding the date of removal for EU 37 and Targa did not provide a response.**

**B. General Provisions [40 CFR 63.6665]**

1. The General Provisions at 40 CFR part 63, subpart A apply as specified in Table 8 of 40 CFR part 63, subpart ZZZZ. Notwithstanding conditions in this permit, the Permittee shall comply

with all applicable requirements of 40 CFR part 63, subpart A.

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

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

**C. Requirements for EU 52 [40 CFR 63.6590(c)(4)]**

For RICE EU 52, the Permittee shall meet the requirements of 40 CFR part 63, subpart ZZZZ by meeting the requirements of Subpart JJJJ, for stationary SI engines. No further requirements apply to emissions unit EU 52 under 40 CFR part 63. The applicable requirements of Subpart JJJJ are specified in Section II of this permit.

**OBSERVATION: Engine EU 52 is a 4SRB with a site rating of less than or equal to 500 hp located at a major source of HAP emissions, therefore, this engine complies with MACT ZZZZ by complying with NSPS JJJJ. No other requirements apply in MACT ZZZZ.**

**D. Compliance Date for EU 1, EU 37 and EU 41 [40 CFR 63.6590(a)(2)(i) and 63.6595(b)]**

This subpart applies to each affected source whereas emissions units EU 1, EU 37 and EU 41 are new stationary RICE with a site rating of more than 500 hp located at a major source of HAP emissions and commenced construction after December 19, 2002. EU 37 and EU 41 must comply with the applicable emission limitations and operating limitations in this subpart upon startup. EU 1 must comply with the applicable emission limitations and operating limitations in this subpart within 3 years after the area source became a major source.

**OBSERVATION: Targa provided notification that the facility became a major source on October 19, 2019 in a permit modification. The permit modification noted an install date for EU 37, EU 41 and EU 52 (EU 52 is not part of this sections compliance evaluation however it is being noted for informational purposes only) of October 15, 2018. The permit modification also listed the facility as a major source of HAP with 27.2 tpy PTE total HAP.**

**Area of Concern: EU 1 and EU 41 should have been complying with MACT ZZZZ requirements no later than October 15, 2021 as specified in § 63.6595(b)(2), whereas an area source that becomes a major source has three years to be in compliance. According to information provided by Targa, EU 1 and EU 41 operating at Johnson did not comply with monitoring requirements to install temperature probes or pressure tubing. EU 1 had the monitoring equipment installed on May 26, 2022. EU 41 had the monitoring equipment installed March 22, 2022. Therefore, EU 1 operated without CPMS for 223 days and EU 41 operated without CPMS for 159 days.**

**E. Emission and Operating Limitations for EU 1 [40 CFR 63.6600(b), Table 2a.2 and Table 2b.1]**

1. Emissions from engine, emissions unit EU 1, is a new stationary RICE with a site rating of more than 250 hp located at a major source of HAP emissions and shall minimize the time spent at idle and minimize start up time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emissions limitations apply. The engine shall meet either of the following emission limitations as specified in Table 2a.2:
  - a. Reduce CO emissions by 93.0% or more; or

- b. Limit the concentration of formaldehyde in the stationary RICE exhaust to 14 parts per million, volumetric dry (ppmvd) or less at 15.0% oxygen (O<sub>2</sub>).
2. Engine EU 1 is a new stationary RICE with a site rating of more than 250 hp located at a major source of HAP emissions that uses an oxidation catalyst to comply with the emission limitations shall meet the following operating limitations as specified in Table 2b.1:
- (a) Maintain the catalyst so that the pressure drop across the catalyst does not change by more than 2 inches of water at 100% load plus or minus 10% from the pressure drop across the catalyst that was measured during the initial performance test; and
  - (b) Maintain the temperature of each RICE's exhaust so that the catalyst inlet temperature is greater than or equal to 450°F and less than or equal to 1,350 °F.

**OBSERVATION: EU 41 complies with the requirement to limit the concentration of formaldehyde in to 14 ppmvd or less at 15.0% O<sub>2</sub>. Results of the performance tests are below in Table 5. For EU 1, EPA inspectors reviewed the data provided during the records review regarding temperature deviating below 750°F or above 1,350°F when the engine was operating. EPA inspectors discovered 2.7% of operating time errors for temperature sensor deviations.**

**Area of Concern: Monthly pressure (dP) reading reviews showed that Targa missed the monthly pressure readings for 3 months, January, February and March, 2023 for engines EU 1 and EU 41 at Johnson. Additionally, most of the temperature deviations appeared to be failures to record actual values. As noted in certain MACT ZZZZ reports submitted for other Targa facilities, 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.**

**Area of Concern: EPA inspectors requested MACT ZZZZ reports during the records review. Targa did not provide a response and therefore EPA does not have records of MACT ZZZZ reports submitted for the subject engines operating at Johnson.**

**F. Emission and Operating Limitations for EU 37 and EU 41**  
[40 CFR 63.6600(a), Table 1a.1 and Table 1b.1]

1. Emissions from engines, emissions units EU 37 and EU 41, are new stationary RICE with a site rating of more than 500 hp located at a major source of HAP emissions and shall minimize the time spent at idle and minimize start up time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emissions limitations apply. 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 ppmvd or less at 15.0% O<sub>2</sub>.
2. Engines EU 37 and EU 41 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: Results of the performance tests are below in Table 5. EU 41 complies with the requirement to limit the concentration of formaldehyde in to 350 ppmvd or less at 15.0% O<sub>2</sub>. For EU 41, EPA inspectors reviewed the data provided during the records review regarding temperature deviating below 450°F or above 1,250°F when the engine was operating. EPA inspectors discovered 5.1% of operating time errors for temperature sensor deviations.**

**Area of Concern: Monthly pressure (dP) reading reviews showed that Targa missed the monthly pressure readings for 3 months, January, February and March, 2022 for engines EU 1 and EU 41 at Johnson. Additionally, most of the temperature deviations appeared to be failures to record actual values. As noted in certain MACT ZZZZ reports submitted for other Targa facilities, 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.**

**Area of Concern: EPA inspectors requested MACT ZZZZ reports during the records review. Targa did not provide a response and therefore EPA does not have records of MACT ZZZZ reports submitted for the subject engines operating at Johnson.**

**G. General Compliance Requirements for EU 1, EU 37 and EU 42 [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.

**H. Testing and Initial Requirements for EU 1, EU 37 and EU 41 [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 37 and EU 41, 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 V.D and Section V.E of this permit for engines EU 1, EU 37 and EU 41, 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 37 and EU 41 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: Results of the performance tests dating back to 2020 are provided in Table 5 below. The engines at Johnson have been tested according to ASTM D6348-03, as required in § 60.4244 and Table 4 of MACT ZZZZ. Each test is conducted with a duration of 3x1 hour test runs.**

**Table 5: MACT ZZZZ Performance Test Results**

| Emission Unit ID | Test Date  | Emission limit* | CH <sub>2</sub> O | Catalyst Inlet Temp (F°) | dP (inches H <sub>2</sub> O) | Average Engine Load (%) | Engine Runtime (hours) |
|------------------|------------|-----------------|-------------------|--------------------------|------------------------------|-------------------------|------------------------|
| EU-1             | 12/30/2020 | 14              | 4.98              | 1062                     | 2                            | 91                      | 3017                   |
| EU-41            | 12/29/2020 | 350             | 57.17             | 1014                     | 3.9                          | 92                      | 18286                  |
| EU 1             | 12/23/2021 | 14              | 2.71              | 656                      | 2.3                          | 90                      | 7832                   |
| EU-41            | 12/23/2021 | 350             | 78.067            | 1018                     | 4.1                          | 91                      | 26590                  |
| EU 1             | 8/11/2022  | 14              | 3.81              | 819                      | 2.8                          | 84.82                   | 10181                  |
| EU-41            | 10/10/2022 | 350             | 0.13              | 793                      | 2.3                          | 94.2                    | 32938                  |

The emission limit for EU 1 is 14 ppmvd CH<sub>2</sub>O. The emission limit for EU 41 is 350 ppbvd CH<sub>2</sub>O.

#### **I. Monitoring, Installation, Collection, Operation and Maintenance Requirements for EU 1, EU 37, and EU 41 [40 CFR 63.6625]**

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

**OBSERVATION: for EU 1, EPA inspectors reviewed the data provided during the records review regarding temperature deviating below 750°F or above 1,350°F when the engine was operating. EPA inspectors discovered 883 instances of deviations, equating to approximately 2.7% of operating time errors for temperature sensor deviations.**

**For EU 41, EPA inspectors reviewed the data provided during the records review regarding temperature deviating below 450°F or above 1,350°F when the engine was operating. EPA inspectors discovered 2,094 instances of deviations, equating to approximately 5.1% of operating time errors for temperature sensor deviations.**

**Area of Concern:** Monthly pressure (dP) reading reviews showed that Targa missed the monthly pressure readings for 3 months, January, February and March, 2022 for engines EU 1 and EU 41 at Johnson. Additionally, most of the temperature deviations appeared to be failures to record actual values. As noted in certain MACT ZZZZ reports submitted for other Targa facilities, 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.

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

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

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

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

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

**Area of Concern:** EU 1 and EU 41 should have been complying with MACT ZZZZ requirements no later than October 15, 2021 as specified in § 63.6595(b)(2), whereas an area source that becomes a major source has three years to be in compliance. According to information provided by Targa, EU 1 and EU 41 operating at Johnson did not comply with monitoring requirements to install temperature probes or pressure tubing. EU 1 had the monitoring equipment installed on May 26, 2022. EU 41 had the monitoring equipment installed March 22, 2022. Therefore, EU 1 operated without CPMS as required in § 63.6625(b) for 223 days and EU 41 operated without CPMS for 159 days.

**J. Initial Compliance Requirements for EU 1, EU 37, and EU 41 [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 new non-emergency 4SLB stationary RICE greater than 250 hp located at a major source of HAP, emissions units EU 1, follow Table 5.1 to comply with the requirement to reduce CO emissions and using oxidation catalyst and using a CPMS.
  - (b) For new non-emergency stationary RICE greater than 500 hp located at a major source of HAP, emissions units EU 1, EU 37 and EU 41, follow Table 5.9 to comply with the requirement to limit the concentration of formaldehyde in the exhaust and using an oxidation catalyst and using a CPMS.

- (c) For Non-emergency 4SRB stationary RICE greater than 500 hp located at a major source of HAP, emissions units EU 37 and EU 41, 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 2b.1 during the initial performance test as specified in §63.6630(b).

**OBSERVATION: Targa provided performance tests showing compliance with the emissions limitations back to the previous inspection.**

**OBSERVATION: Targa provided notification that the facility became a major source on October 19, 2019 in a permit modification. The permit modification noted an install date for EU 37, EU 41 and EU 52 (EU 52 is not part of this sections compliance evaluation however it is being noted for informational purposes only) of October 15, 2018. The permit modification also listed the facility as a major source of HAP with 27.2 tpy PTE total HAP.**

**Area of Concern: EU 1 and EU 41 should have been complying with MACT ZZZZ requirements no later than October 15, 2021 as specified in § 63.6595(b)(2), whereas an area source that becomes a major source has three years to be in compliance. According to information provided by Targa, EU 1 and EU 41 operating at Johnson did not comply with monitoring requirements to install temperature probes or pressure tubing. EU 1 had the monitoring equipment installed on May 26, 2022. EU 41 had the monitoring equipment installed March 22, 2022. EU 1 operated without CPMS for 223 days and EU 41 operated without CPMS for 159 days. Therefore, Targa did not comply with initial compliance of operating limitations according to § 63.6630(a) and § 63.6630(b). EPA does not have records of Notification of Compliance Status as specified in § 63.6630(c).**

**K. Continuous Compliance Requirements for EU 1, EU 37, and EU 41 [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 Johnson, 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 37 and EU 41 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 500 hp located at a major source of HAP, emissions units EU 1: 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 stationary RICE greater than 500 hp located at a major source of HAP, emissions units EU 1, EU 37 and EU 41: Follow Table 6.7 to comply with the requirement to limit the concentration of formaldehyde in the exhaust and using an oxidation catalyst and using a CPMS.

- (c) For non-emergency 4SRB stationary RICE greater than 500 hp, emissions unit EU 37 and EU 41: Follow Table 6.4 to comply with the requirement to reduce formaldehyde emissions and using NSCR.
3. The Permittee shall report each instance where EU 1, EU 37 and EU 41 did not meet each emission limitation, operating limitation, or requirement as specified in §63.6640(b) and (e).

**OBSERVATION: Targa provided performance tests showing compliance with the emissions limitations back to the previous inspection.**

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

**L. Notifications, Reports and Records for EU 1, EU 37 and EU 41**[40 CFR 63.6645, 63.6650, 63.6655, 63.6660]

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

**OBSERVATION: Targa provided records of CPMS data and performance tests.**

**Area of Concern: EPA inspectors requested MACT ZZZZ reports during the records review. Targa did not provide a response and therefore EPA does not have records of MACT ZZZZ reports submitted for the subject engines operating at Johnson.**

**V. 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 HAPs is not subject to a relevant standard or other requirement established under 40 CFR part 63, the Permittee shall keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination shall include an analysis (or other information) that demonstrates why the Permittee believes the source is unaffected (e.g., because the source is an area source). [40 CFR 63.10(b)(3)]
2. Records shall be kept of off permit changes, as required by the Off Permit Changes section of this permit.

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

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

1. The Permittee shall submit to the EPA all reports of any required monitoring under this permit semiannually. Reports shall be submitted semi-annually, by April 1<sup>st</sup> and October 1<sup>st</sup> of each year. The report due on April 1<sup>st</sup> shall cover the 6-month period ending on the last day of December before the report is due. The report due on October 1<sup>st</sup> 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 an hour in excess of permit requirements, the report shall be made within 24 hours of the occurrence.
    - (ii) For emissions of any regulated air pollutant, excluding a HAP or a toxic air pollutant that continues for more than 2 hours in excess of permit requirements, the report shall be made within 48 hours.
    - (iii) For all other deviations from permit requirements, the report shall be submitted with the semi-annual monitoring report.
  - (c) If any of the conditions in (i) or (ii) of paragraph (b) above are met, the Permittee shall notify the EPA by telephone (1-800-227-6312), facsimile (303-312-6409), or by email to [r8airreportenforcement@epa.gov](mailto: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 7 below.**

## **VI. 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 1<sup>st</sup>. The fee shall cover the previous calendar year.
3. The fee payment shall be in United States currency and shall be paid by money order, bank draft, certified check, corporate check, or electronic funds transfer payable to the order of the U.S. Environmental Protection Agency.
4. The Permittee shall send fee payment and a completed fee filing form to:

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

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

**For non-U.S. Postal Service express mail**

U.S. Bank  
Government Lockbox 979078  
U.S. EPA FOIA & Misc. Payments  
1005 Convention Plaza  
SL-MO-C2-GL  
St. Louis, MO 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 Johnson. See Table 6 below**

**Table 6: Fee year and annual actual emissions**

| Fee Year | NO <sub>x</sub> | VOC    | SO <sub>2</sub> | PM <sub>10</sub> | HAP Total | Fee Paid   |
|----------|-----------------|--------|-----------------|------------------|-----------|------------|
| 2020     | 25.7            | 81.2   | n.r.            | 0.6              | 13.2      | \$5,869.50 |
| 2021     | 18.2            | 52.8   | 0.06            | 0.02             | 10.6      | \$4,593.99 |
| 2022     | 9.71            | 135.04 | 0.06            | 0.25             | 8.86      | \$9,321.40 |

**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 HAPs 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 1<sup>st</sup>.
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 6 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 1<sup>st</sup>, and shall cover the same 12-month period as the two consecutive semi-annual monitoring reports.

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

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

**OBSERVATION: Targa submits documentation of TV annual compliance (TVACC's) shown below in Table 7.**

**Table 7: SIXMON and TVACC Reports**

| Sent      | Report Type | Reporting Period    | Deviations                                                                                                                                                                                                                                        |
|-----------|-------------|---------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 9/24/2021 | SIXMON      | 1/1/2021-6/30/2021  | None reported                                                                                                                                                                                                                                     |
| 1/20/2022 | SIXMON      | 7/1/2021-12/31/2021 | None reported                                                                                                                                                                                                                                     |
| 1/20/2022 | TVACC       | 1/1/2021-12/31/2021 | None reported                                                                                                                                                                                                                                     |
| 7/29/2022 | SIXMON      | 1/1/22-6/30/2022    | <ul style="list-style-type: none"> <li>●EU1 Temp probes and pressure tubing across catalyst not installed until May 26, 2022.</li> <li>●EU41 Temp probes and pressure tubing across catalyst not installed until March 22, 2022, 2022.</li> </ul> |
| 1/31/2023 | SIXMON      | 7/1/2022-12/31/2022 | 10/25/2022-1/13/2023: OOOOa repairs delayed greater than 30-day period due to wintry conditions. Leak located on EU-41's compressor. Corrective action appeared to be a new communications system.                                                |

|           |       |                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|-----------|-------|---------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1/31/2023 | TVACC | 1/1/2022-12/31/2022 | <ul style="list-style-type: none"> <li>•EU1 Temp probes and pressure tubing across catalyst not installed until May 25, 2022.</li> <li>•EU41 Temp probes and pressure tubing across catalyst not installed until March 22, 2022.</li> <li>•10/25/2022-1/13/2023: OOOOa repairs delayed greater than 30-day period due to wintery conditions. Leak located on EU-41's compressor. Corrective action appeared to be a new communications system.</li> </ul> |
|-----------|-------|---------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

**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 Permitting and Modeling Branch, 8ARD-PM  
1595 Wynkoop Street  
Denver, Colorado 80202

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

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

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

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

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

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

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

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

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

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

**OBSERVATION: No permit amendments have been requested during the time since the previous inspection.**

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

1. The Permittee may request the use of minor permit modification procedures only for those modifications that:
  - (a) Do not violate any applicable requirement;
  - (b) Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
  - (c) Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
  - (d) Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
    - (i) A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I; and
    - (ii) An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the CAA;
  - (e) Are not modifications under any provision of Title I of the CAA; and
  - (f) Are not required to be processed as a significant modification.
2. Notwithstanding the list of changes ineligible for minor permit modification procedures in 1 above, minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in an applicable implementation plan or in applicable requirements promulgated by the EPA.
3. An application requesting the use of minor permit modification procedures shall meet the requirements of 40 CFR 71.5(c) and shall include the following:
  - (a) A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
  - (b) The source's suggested draft permit;
  - (c) Certification by a responsible official, consistent with 40 CFR 71.5(d), that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
  - (d) Completed forms for the permitting authority to use to notify affected states as required under 40 CFR 71.8.
4. The source may make the change proposed in its minor permit modification application immediately after it files such application. After the source makes the change allowed by the preceding sentence, and until the permitting authority takes any of the actions authorized by 40 CFR 71.7(e)(1)(iv)(A) through (C), the source must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time period, the source need not comply with the existing permit terms and conditions it seeks to modify. However, if the source fails to comply with its

proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it.

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

**OBSERVATION: No permit modifications have been requested in the time between since the previous inspection.**

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

1. The Permittee must request the use of significant permit modification procedures for those modifications that:
  - (a) Do not qualify as minor permit modifications or as administrative amendments;
  - (b) Are significant changes in existing monitoring permit terms or conditions; or
  - (c) Are relaxations of reporting or recordkeeping permit terms or conditions.
2. Nothing herein shall be construed to preclude the Permittee from making changes consistent with Part 71 that would render existing permit compliance terms and conditions irrelevant.
3. Permittees must meet all requirements of Part 71 for applications, public participation, and review by affected states and tribes for significant permit modifications. For the application to be determined complete, the Permittee must supply all information that is required by 40 CFR 71.5(c) for permit issuance and renewal, but only that information that is related to the proposed change.

**OBSERVATION: No permit modifications have been requested in the time between 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:
2. 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;
3. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
4. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
5. 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 40 CFR part 70 or Part 71 permit under an EPA-approved or delegated permit program.
2. Expiration of this permit terminates the Permittee's right to operate unless a timely and complete permit renewal application has been submitted at least 6 months but not more than 18 months prior to the date of expiration of this permit.
3. If the Permittee submits a timely and complete permit application for renewal, consistent with 40 CFR 71.5(a)(2), but the EPA has failed to issue or deny the renewal permit, then all the terms and conditions of the permit, including any permit shield granted pursuant to 40 CFR 71.6(f) shall remain in effect until the renewal permit has been issued or denied.
4. The Permittee's failure to have a Part 71 permit is not a violation of this part until the EPA takes final action on the permit renewal application. This protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit any additional information identified as being needed to process the application by the deadline specified in writing by the EPA.
5. Renewal of this permit is subject to the same procedural requirements that apply to initial permit issuance, including those for public participation, affected state, and tribal review.
6. The application for renewal shall include the current permit number, description of permit revisions and off permit changes that occurred during the permit term, any applicable requirements that were promulgated and not incorporated into the permit during the permit term, and other information required by the application form.

## APPENDIX A: Site Overview



## APPENDIX B: Photo Log

| File Name | Description                                                                                                                                                                         | Photographer |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| MOV_0317  | ECD emissions bypassing pilot, unburned hydrocarbons                                                                                                                                | [REDACTED]   |
| MOV_0318  | Regulator associated with EU-1 venting emissions                                                                                                                                    | [REDACTED]   |
| MOV_0319  | Continuous moderate emissions between either 2 <sup>nd</sup> /3 <sup>rd</sup> stage through liquid level controller of EU-1 (Vast emissions detected on FLIR too large to pinpoint) | [REDACTED]   |