Operated by Targa Badlands, LLC – Blue Buttes Compressor Station and Pump Station
Full Compliance Evaluation (FCE)
On-Site Inspection

Inspection Date:	June 15, 2023
Inspection Report Date:	August 1, 2023
EPA Representatives:	Colin LeCortz, Environmental Scientist, US EPA Region 8 Alexis North, Environmental Scientist, US EPA Region 8 Bob Gallagher, Environmental Scientist, US EPA Region 8 Phil Meyers, EPA Inspector, US EPA NEIC Griffith Brown, US EPA Region 6
Tribal Representatives:	Dwight Bruce
Company Representatives:	Mitchell Anderson Adam Moore
Inspection Report Prepared By:	Colin LeCortz, Environmental Scientist, US EPA Region 8
Inspection Report Reviewed By:	Scott Patefield, Manager, Enforcement and Compliance Assurance Division, Air and Toxics Enforcement Branch SCOTT PATEFIELD Digitally signed by SCOTT PATEFIELD Date: 2023.08.14 14:09:33 -06'00'
Last Inspection:	August 18, 2020
Operating Status:	Operating
Applicable Requirements:	40 CFR Part 60, Subpart JJJJ: Standards of Performance for New Stationary Spark Ignition Internal Combustion Engines (NSPS JJJJ) 40 CFR Part 60, Subpart OOOO: Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Reconstruction or Modification Commenced After August 23, 2011 and on or before September 18, 2015 (NSPS OOOO) 40 CFR Part 60, Subpart OOOOa Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 (NSPS OOOOa) 40 CFR Part 63, Subpart HH) National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities (MACT HH) 40 CFR Part 63, Subpart ZZZZ: National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (MACT ZZZZ)

Permit Number: V-TAT-000676-2014.00
Replaces Permit No.: NA

Issue Date: January 22, 2020
Effective Date: January 22, 2020
Expiration Date: January 22, 2025

Facility Information and Emission Unit Identification

Parent Company Name:	Targa Badlands, LLC (Targa)
Mailing Address:	1939 125th Avenue NW, Watford City, North Dakota 58854
Facility Contact:	Mitchell Anderson, Senior Environmental Specialist (701) 842-3315
Facility Operator & Name:	Targa – Blue Buttes Compressor Station and Pump Station (Blue Buttes)
Facility Location:	Latitude 47.86140, Longitude -102.78414
County, State:	McKenzie County, North Dakota
Reservation:	Fort Berthold Indian Reservation
Tribe:	Three Affiliated Tribes
Responsible Official:	Dwayne Burks, VP Operations
SIC Code:	1311 – Crude Petroleum and Natural Gas
AFS ID:	38-053-00142
Other CAA Permits:	There are no other CAA permits for this facility.

Enforcement History

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

1. Failure to submit 2019 Title V fee payment and annual emissions inventory on April 1, 2020, in violation of V-TAT-000670-2015.00, Sections VIII.A and B at Junction Compressor Station.
2. Failure to performance an initial performance test for engines EU 23, EU 24 and EU 25 within one year of startup in violation of V-TAT-000676-2014.00, Sections VII.D.2 and E, and 40 CFR § 60.5413 at Blue Buttes Compressor Station.
3. Failure to performance an initial performance on combustor EU 22 in violation of V-TAT-000676-2014.00, Section VI.B at Blue Buttes Compressor Station.
4. Failure to perform 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_3310.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: 82071). EPA has concerns that a performance test should be conducted according to NSPS OOOO due to increased condensate throughput to the facility, and thus higher VOC emissions being routed from the storage tanks to the ECD.
2. EPA has additional areas of concerns regarding NSPS OOOO and NSPS OOOOa including emissions detected from storage tanks and components on the inlet seperator. See NSPS OOOO and NSPS OOOOa sections below for more information.
3. Targa has cancelled or changed scheduled performance test dates prior to the scheduled performance test after giving 30-day prior notice as required in 60.8(d). Targa is required to provide reasons for the delay and maintain communications and follow-up. This last occurred for engines EU 1 and EU 2 on April 14, 2023, January 7, 2022, December 21, 2022, and December 21, 2020. EPA advises Targa to include reasoning for performance test delays if this occurs in the future.
4. Targa used ProMax to determine benzene concentration in their recent 2022 dehydration unit 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.
5. EPA has numerous concerns regarding the engine compliance with MACT ZZZZ. Specifically for reporting and CPMS. See the MACT ZZZZ section below.
6. Targa did not provide records regarding rod packing replacement according to NSPS OOOOa after request by EPA inspectors. EPA otherwise does not have records of rod packing replacement or hours of rod packing operation.

Compliance Assistance

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

Description of Operations[1]

Blue Buttes Compressor Station receives a comingled liquid stream containing natural gas, natural gas condensate and produced water from third-party production wells in the surrounding field. The inlet stream is routed to a 3-phase separator where liquids are gravimetrically separated. The natural gas condensate and produced water are routed to 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 site for further processing or treatment. Condensate accumulated in the storage tank may also be transferred off-site using an injection pump skid at a pump station that is co-located with the compressor station. Targa operates natural-gas powered engines (Emissions Units EU 23 and EU 24 in Table 2 below) for electric power generation at the pump station.

Natural gas exits the separator and flows to three compressor engines (Emissions Units EU 1, EU 2 and EU 18 in Table 2 below) which compresses the gas before it enters a triethylene glycol (TEG) dehydration unit (Emissions Unit EU 7 in Table 2 below). The compressed natural gas enters EU 7 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

[1] The description of operations provided here is a modified excerpt from the process description from the Title V Permit, V-TAT-000676-2014.00.

concentration determined by a sales contract. The pipeline quality natural gas then exits the contactor, is metered and then routed off site. The rich TEG exits the contactor and is depressurized in a TEG flash tank. The emissions from the flash tank are vented to the atmosphere. The depressurized TEG is routed to and regenerated using heat in a vessel called a TEG reboiler. Methanol is injected at different points into the rich TEG to prevent hydrates from forming. The vapors from the TEG reboiler are also vented to the atmosphere. The regenerated lean TEG is circulated back to the contactor.

General Inspection Observations and Commentary

EPA representatives Colin LeCortz, Alexis North, Bob Gallagher, Griffith Brown and Phil Myers, and tribal representative Dwight Bruce met with Targa representatives at Blue Buttes Compressor Station (Blue Buttes) operated by Targa at 9:24 AM on June 15, 2023. At the first facility inspected on June 15, 2023 (see Clarks Creek inspection report), Targa discussed a Job Safety Analysis was conducted by Targa representatives, and Targa was informed that EPA inspectors would be using an intrinsically safe forward looking infrared (FLIR) camera and a geospatial mapping of air pollution (GMAP) vehicle for the entire day's inspections. No hot work permit was required. EPA inspector Mr. LeCortz informed Targa representatives that the environmental manager would receive lists of questions to assist in the records review portion regarding the operations at Blue Buttes.

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

1. Maximum throughput capacity is 15-16 MMscf/d.
2. Natural gas discharge at time of inspection: 5.8 MMscf/d.
3. ENG 3 (EU-18 in Table 2 below) was not operating at the time of inspection because there was not enough flow in the field according to Targa representatives.

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_3310.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: 82071). A pilot was not visible however a Targa representative called the operations team who confirmed a pilot was on and the control panel noted the pilot was lit. The temperature probe on the Tripoint screen noted the temperature inside the stack of the ECD was 117°F.
2. A storage tank closed-vent system (CVS) component was venting emissions when viewed with the FLIR camera (MOV_3309.mp4). Two storage tanks, one produced water and one condensate tank, were located at the facility, both have emissions routed in the same manifolded CVS.
3. The inlet seperator had a component or controller that was venting emissions as seen via FLIR and GMAP (MOV_0313.mp4).
4. The dehydration unit glycol pump, model Kimray 21020 PV, was counted to pump at approximately 10 strokes per minute.
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
EU 18	January, 2006	Model: L5774LT ESM SN:C-16314/1	Engine off	Engine off	Engine off	Engine off	Engine off
EU 1	2013, engine label illegible)	Model: WPW00232	Not monitored by Targa	Not monitored by Targa	Not monitored by Targa	Not monitored by Targa	68215.2

EU 2	Engine label illegible	Engine label illegible	Not monitored by Targa	785	Not monitored by Targa	Not monitored by Targa	67315

* 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 receive 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, Mr. LeCortz discussed emissions bypassing the ECD that were discovered by EPA inspectors onsite, emissions noted coming from the inlet seperator, engine monitoring parameters that appear to not be monitored onsite, and that Mr. LeCortz will be requesting information via email about certain operating parameters.

EPA inspectors drove the GMAP vehicle through certain areas of the facility which recorded ambient conditions of multiple pollutants including total VOC (TVOC) and benzene emissions. A full report of the GMAP records and canister samples taken for each inspection that occurred on June 15, 2023 will be provided by EPA NEIC at a later date.

EPA staff departed the facility at 10:00 AM. An email to request relevant compliance-related information and records was sent to Mr. Anderson prior to the onsite inspection on June 13, 2023. Mr. Anderson provided the requested information to EPA via email on July 14, 2023.

Potential to Emit (PTE)

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

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

Table 1: Potential to Emit in Tons Per Year (tpy)
Targa Blue Buttes

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

Emissions Unit Id.*	NO_X (tons/yr)	VOC (tons/yr)	SO_2 (tons/yr)	PM_{10} (tons/yr)	$PM_{2.5}$ (tons/yr)	CO (tons/yr)	CO_2e (tons/yr)	HAPs (tons/yr)
EU 1	20.95	5.97	0.02	0.35	0.35	18.86	5797.50	3.62
EU 2	12.46	4.82	0.02	0.28	0.28	17.44	4643.01	2.89
EU 7	-	52.79	-	-	-	-	-	2.15
EU 8	-	133.11	-	-	-	-	2938.44	2.97
EU 9	-	20.25	-	-	-	-	447.06	0.45
EU 15	-	21.27	-	-	-	-	260.56	4.34
EU 16	-	-	-	-	-	-	-	-
EU 17	-	9.45	-	-	-	-	0.65	0.72
EU 18	25.96	11.74	0.03	0.47	0.47	24.72	6839.60	5.40
EU 22	0.08	1.98	<0.01	-	-	0.45	175.35	0.14
EU 23	3.67	2.57	<0.01	0.28	0.28	7.34	1652.05	0.46
EU 24	3.67	2.57	<0.01	0.28	0.28	7.34	1652.05	0.46
EU 25	1.92	1.55	<0.01	0.20	0.20	3.84	1176.50	0.33
TOTAL	68.71	246.81**	0.09	1.85	1.85	79.99	25619.37	23.93

*NO_X = nitrogen oxide; VOC = volatile organic compound; SO_2 = sulfur dioxide; PM = particulate matter; CO = carbon monoxide; CO_2e = carbon dioxide equivalent; HAP = hazardous air pollutant.
**Note: EU 15 are fugitive emissions from the compressor station. The PTE of the facility with the fugitive emissions is 268.08 tpy of VOC, which is above the PSD major source permitting threshold, however as specified in the definition in §52.21(b)(1)(iii), the fugitive emissions of a stationary source, unless otherwise specified, shall not be included in determining for any of the purposes of PSD whether it is a stationary source.

Federally Enforceable Requirements and Compliance Status

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

A. Facility Emission Points

Table 2. Emission Units and Emission Generating Activities

Emissions Unit ID	Description (acronyms defined below table)	Control Equipment
EU 1	Caterpillar G3516LE, 10.12 MMBtu/hr, 1,085 hp, 4SLB Natural Gas Compressor Engine: Serial Number: WPT00232 Installed: 2/18/2013 Manufactured: 1/2/07	None
EU 2	Caterpillar G3512LE, 10.12 MMBtu/hr, 860 hp, 4SLB Natural Gas Compressor Engine: Serial Number: WPP00138 Installed: 2/18/2013 Manufactured: 9/15/06	None
EU 5	0.5 MMBtu/hr Tank Heater	None (IEU)
EU 7	15 MMscfd TEG Dehydrator Installed: 2/18/2013	None
EU 4	0.5 MMBtu/hr TEG Reboiler	None (IEU)
EU 8	Pneumatic methanol injection pumps Installed: 2/18/2013	None
EU 9	Pneumatic devices Installed: 2/18/2013	None
EU 10	One - 505 gallon Methanol Storage Tank	None (IEU)
EU 11	One - 1,050 gallon Methanol Storage Tank	None (IEU)
EU 12	One - 400 bbl Produced Water Storage Tank	None (IEU)
EU 13	Produced Water Loading	None (IEU)
EU 14	Pig Receiver	None (IEU)
EU 15	Fugitive Emissions (Valves, pumps, seals, flanges)	None
EU 16	One 400 bbl Condensate Storage Tank Installed: 2/18/2013	Vapor Combustor (EU 22)
EU 17	Condensate Loading Installed: 2/18/2013	None
EU 18	Waukesha L5774LT, 10.69 MMBtu/hr, 1,280 hp, 4SLB Natural Gas Compressor Engine: Serial number: C-16314/1 Installed: 6/25/14 Manufactured: 1/5/06 Ariel JGK/4 Reciprocating Compressor Serial Number: F-23762	None
EU 22	Vapor Combustor Installed: 3/23/2015	None
EU 23	Cummins KTA19GC; 3.26 MMBtu/hr, 380 hp, 4SRB Natural Gas-Powered Generator for facility electric power generation Serial number: M141383783 Installed: 5/25/2015	None
EU 24	Cummins KTA19GC; 3.26 MMBtu/hr, 380 hp, 4SRB Natural Gas-Powered Generator for facility electric power generation Serial number: M141383782 Installed: 5/25/2015	None
EU 25	NG Engines PSI HD 8.1L T, 2.32 MMBtu/hr, 199 hp, 4SRB Natural Gas-Powered Generator for facility electric power generation: Serial Number: EEPOG200813 Installed: 5/19/16	None

MMBtu/hr = million British thermal units per hour; hp = horsepower; MMscfd = million standard cubic feet per day; bbl = barrel; 4SLB = 4 Stroke Lean-Burn, 4SRB = 4 Stroke Rich-Burn, IEU = Insignificant Emissions Unit.

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

Table 3: Requirements for Emission Units

Equipment	Applicable Requirements	Limitations	Monitoring	
			Method	Interval
EU 1	MACT ZZZZ/ NSPS JJJJ	Limit CH2O to 14 ppm @ 15.0% O2 (MACT ZZZZ) and 1.0 g/hp-hr VOC, 1.0 g/hp-hr VOC, 4.0 g/hp-hr CO, 3.0 g/hp-hr NOx, NSPS JJJJ	Performance test	Semiannually or Annually*
	NSPS OOOOa	Rod Packing	60.5385a(a)(1)\ (2)	Change rod packing every 26,000 hours or 36 months.
EU 2	MACT ZZZZ/ NSPS JJJJ	Limit CH2O to 14 ppm @ 15.0% O2 (MACT ZZZZ) and 1.0 g/hp-hr VOC, 1.0 g/hp-hr VOC, 4.0 g/hp-hr CO, 3.0 g/hp-hr NOx, NSPS JJJJ	Performance test	Semiannually or Annually*
	NSPS OOOOa	Rod Packing	60.5385a(a)(1)/(2)	Change rod packing every 26,000 hours or 36 months.
EU 5	None	NA	NA	NA
EU 7 EU 4	MACT HH	85 Mscf/d or actual annual average benzene <0.90 Mg/yr	63.772(b)	Annually
EU 8	None	NA	NA	NA
EU 9	NA	NA	NA	NA
EU 10	None	NA	NA	NA
EU 11	None	NA	NA	NA
EU 12	NSPS OOOO	Monthly AVO	Monthly AVO	Monthly
EU 13	NSPS OOOO	Monthly AVO	Monthly AVO	Monthly
EU 14	NA	NA	NA	NA
EU 15	NA	NA	NA	NA
EU 16	NSPS OOOO	Monthly AVO	Monthly AVO	Monthly

EU 17	NSPS OOOO	Monthly AVO	Monthly AVO	Monthly
EU 18	MACT ZZZZ NSPS OOOO	Limit CH2O to 14 ppm @ 15.0% O2 Rod Packing	Performance test 60.5385(a)(1)/(2)	Semiannually or Annually* Change rod packing every 26,000 hours or 36 months.
EU 22	NSPS OOOO	Control tank emissions by 95% through EU 22.	60.18	Continuous
		Monthly AVO	Monthly AVO	Monthly
~~EU 23 (Removed)~~	~~NSPS JJJJ~~	~~NOx = 1.0 g/hp-hr CO = 2.0 g/hp-hr VOC = 0.7 g/hp-hr~~	~~Performance test~~	~~Initial~~
~~EU 24 (Removed)~~	~~NSPS JJJJ~~	~~NOx = 1.0 g/hp-hr CO = 2.0 g/hp-hr VOC = 0.7 g/hp-hr~~	~~Performance test~~	~~Initial~~
~~EU 25 (Removed)~~	~~NSPS JJJJ~~	~~NOx = 1.0 g/hp-hr CO = 2.0 g/hp-hr VOC = 0.7 g/hp-hr~~	~~Performance test~~	~~Initial~~
Fugitive emission sources	NSPS OOOOa	LDAR Program	Method 21	Semiannually

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

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

A. Applicability [40 CFR 60.4230(a)(4)(iii)]

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

1. Cummins KTA19GC engine identified as Emission units EU 23 and in Table 2 of this permit;

2. Cummins KTA19GC engine identified as Emission units EU24 in Table 2 of this permit; and

3. NG Engine PSI HD 8.1L T engine identified as Emissions Unit EU 25 in Table 2 of this permit.

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

OBSERVATION: According to information provided in a 2020 permit modification, engines EU 1 and EU 2 underwent a modification and are now subject to NSPS JJJJ, pursuant to § 60.4230(a)(5). Additionally, in the modification submittal, and SIXMON and TVACC reports it was noted that EU 23, EU 24 and EU 25 were removed from the facility. Pursuant to § 60.4243(a)(2)(ii) only an initial performance test is required which occurred in 2017. Therefore, no compliance will be assessed in this inspection report for EU 23, EU 24 and EU 25.

OBSERVATION: EU-18 was not operating at the time of inspection because there was not enough flow in the field according to Targa representatives. EU 1 and EU 2 were operating. EU-18 was manufactured prior to the trigger date of NSPS JJJJ and therefore is not subject to NSPS JJJJ.

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:

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

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

The Permittee, as an owner and operator of a non-emergency SI ICE with a maximum engine power greater than or equal to 100 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 nitrogen oxides (NO_x);

2. 2.0 g/HP-hr for carbon monoxide (CO); and

3. 0.7 g/HP-hr for volatile organic compounds (VOC).

OBSERVATION: Engines EU 23, EU 24 and EU 25 received initial performance tests showing compliance with these emission standards in 2017. The engines have been removed from the facility and no further compliance was assessed as a part of this inspection report.

Engines EU 1 and EU 2 were modified in 2020 and comply with the emission standards of § 60.4233(f)(4):
1. 3.0 g/HP-hr for NOx;
2. 4.0 g/HP-hr for CO; and
3. 1.0 g/HP-hr for VOC.

See Table 4 below for performance test results.

D. Compliance Requirements [60.4243(b)]

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

1. Purchasing an engine certified according to the procedures specified in Subpart JJJJ for the same model year and demonstrating compliance according to one of the methods specified in paragraphs 1. (a) or (b) of this section:

(a) If the Permittee operates and maintains the certified stationary SI ICE and control device according to the manufactures emission-related written instructions, the Permittee shall keep records of conducted maintenance to demonstrate compliance, but no performance testing is required. The Permittee shall also meet requirements as specified in 40 CFR 1068 subparts A through D, as applicable. If the Permittee adjusts engine settings according to and consistent with the manufacturer's instructions, the stationary SI ICE will not be considered out of compliance; or

(b) If the Permittee does not operate and maintain the certified stationary SI ICE and control device according to the manufactures emission-related written instructions, the engine will be considered a non-certified engine and the Permittee shall demonstrate compliance according to §§60.4243(a)(2)(i) through(iii), as appropriate.

2. Purchasing a non-certified engine and demonstrating compliance with the emission standards specified in Section II.C. of this permit and according to the test methods and other procedures specified in §60.4244, and according to the following:

As an owner or operator of a stationary SI ICE greater than 25 hp and less than or equal to 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 in a manner consistent with good air pollution control practice for minimizing emissions. In addition, the Permittee shall conduct an initial performance test to demonstrate compliance.

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

OBSERVATION: Initial compliance requirements for EU 23, EU 24 and EU 25 were conducted before 2020 and therefore were not reviewed for compliance. Pursuant to § 60.4243(a)(2)(ii) only an initial performance test is required.

Pursuant to § 60.4243(c), Targa operates of stationary SI internal combustion engines EU 1 and EU 2 that must comply with the emission standards specified in § 60.4233(f), therefore Targa must demonstrate compliance according to § 60.4243(b)(2)(ii).

Pursuant to § 60.4243(b)(2)(ii), Targa must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, Targa must conduct an initial performance test and conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first, thereafter to demonstrate compliance. See Table 4 below for performance tests since 2022.

Table 4: EU 1 and EU 2 NSPS JJJJ Performance Tests

Emission Unit	Test Date	NOx (g/hp-hr)	CO (g/hp-hr)	VOC (g/hp-hr)	Average load (%)	Engine Operating Hours
EU 2	1/13/2022	1.885	0.022	0.087	91.35	57659
EU 1	1/13/2022	1.137	0	0.112	91.81	59080
EU 2	2/1/2023	1.848	0.145	0.114	90.05	64520
EU 1	2/2/2023	2.577	0.054	0.142	94.4	66091

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

E. Testing Requirements [60.4244]

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

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

Area of Concern: Targa has cancelled or changed scheduled performance test dates prior to the scheduled performance test after giving 30-day prior notice as required in 60.8(d). Targa is required to provide reasons for the delay and maintain communications and follow-up. This last occurred for engines EU 1 and EU 2 on April 14, 2023, January 7, 2022, December 21, 2022, and December 21, 2020. EPA advises Targa to include reasoning for performance test delays if this occurs in the future.

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

1. The permittee shall keep records according to §60.4245(a);

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

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

OBSERVATION: Targa submits records and reports according to these permit conditions and as specified in NSPS JJJJ.

Areas of concern: Targa should maintain records that can determine the details of certain work orders. On April 20, 2023, an email from Targa discussed a catalyst replacement yet the supplied work order did not correctly indicate parts replaced or the correct date that Targa initially noted the catalyst was determined to need replacement. Certain work orders reviewed did not appear to contain enough information to determine engine maintenance. For example, work order 260105 for Unit 1 does not describe the specific engine at Blue Buttes, nor does it contain the engine operating hours at the time of the 2160 hr maintenance or the specific maintenance conducted.

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

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

1. 40 CFR part 60, subpart OOOO (Subpart OOOO) applies to the following storage vessel, vapor combustor and reciprocating compressor engine:

   (a) Emissions Unit EU 16, in Table 2 of this permit, was constructed after August 23, 2011 and before April 12, 2013 and therefore is a Group 1 storage vessel, and the associated vapor combustor identified as Emissions Unit EU 22; and

   (b) Ariel JGK/4 Reciprocating Compressor associated with Waukesha L5774LT engine identified as Emissions Unit EU 18 in Table 2 of this permit.

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

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

The reciprocating compressor associated with EU 18 was installed on May 14, 2014 and is therefore, subject to the reciprocating compressor requirements of NSPS OOOO.

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

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

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

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

C. General Compliance Requirements [40 CFR 60.5370]

At all times, including periods of startup, shutdown, and malfunction, owners and operators shall maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the EPA which may include but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

Area of Concern: EPA inspectors detected venting emissions from the CVS for the storage vessels when viewed with the FLIR camera (MOV_3309.mp4). Two storage tanks, one produced water and one condensate tank, were located at the facility, both have emissions routed in the same manifolded CVS.

The enclosed combustion device (ECD) was continuously venting unburned hydrocarbon emissions as seen on the FLIR camera (MOV_3310.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: 82071). A pilot was not visible however a Targa representative called the operations team who confirmed a pilot was on and the control panel noted the pilot was lit. The temperature probe on the Tripoint screen noted the temperature inside the stack of the ECD was 117°F.

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

The Permittee shall comply with either of the following requirements for Emissions Unit EU 18 as specified in §60.5385(a):

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

   (b) Prior to 36 months from the date of the most recent rod packing replacement, or 36 months from

the date of startup for a new reciprocating compressor for which the rod packing has not yet been replaced.

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

OBSERVATION: According to information provided by Targa in the 2021 NSPS OOOO annual report, the rod packing for the reciprocating compressor associated with EU 18 was replaced on November 24, 2020, less than 26,000 hours of operation as required by § 60.5385(a)(1).

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

1. The Permittee shall comply with the notification requirements identifying the Group 1 storage vessel, Emissions Unit EU 16, as specified in §60.5395(b) and number 2 of this section.

2. The Permittee shall comply with either of the following requirements for Emissions Units EU 16 and EU 22 as specified in §60.5395(d)-(e):

   (a) Reduce VOC emissions by 95.0% by weight or greater according to the schedule specified in §60.5395 (d)(1)(i)-(ii) and:

      (i) Equip the storage vessels with a cover that meets the requirements of §60.5411(b) and is connected through a closed vent system that meets the requirements of §60.5411(c), and route emissions to a control device that meets the conditions specified in §60.5412(c) and (d); or
      (ii) Route the closed vent system to a process as an alternative to routing the closed vent system to a control device.

   (b) Maintain the uncontrolled actual VOC emissions from the storage vessel affected facility at less than 4 tpy without considering control according to §60.5395(d)(2).

3. The Permittee shall comply with the requirements for storage vessels that are removed from service or returned to service according to §60.5395(f).

Area of Concern: EPA inspectors detected venting emissions from the CVS for the storage vessels when viewed with the FLIR camera (MOV_3309.mp4). Two storage tanks, one produced water and one condensate tank, were located at the facility, both have emissions routed in the same manifolded CVS.

The enclosed combustion device (ECD) was continuously venting unburned hydrocarbon emissions as seen on the FLIR camera (MOV_3310.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: 82071). A pilot was not visible however a Targa representative called the operations team who confirmed a pilot was on and the control panel noted the pilot was lit. The temperature probe on the Tripoint screen noted the temperature inside the stack of the ECD was 117°F.

F. Initial Compliance for Storage Vessel and Reciprocating Compressor Affected Facilities [40 CFR 60.5410]

1. The Permittee shall achieve initial compliance with the standards the reciprocating compressor affected facility, EU 18, according to §60.5410(c).

2. The Permittee shall demonstrate initial compliance for storage vessel EU 16 according to §60.5410(h).

3. The Permittee shall submit notification of initial compliance for the Group 1 storage vessel EU 16

according to §60.5410(i).

OBSERVATION: Initial compliance was determined during previous inspections and was not evaluated during the 2023 inspection. Targa appears to track and continuously monitor the number of hours of operation of the rod packing on the reciprocating compressor associated with EU 18 according to § 60.5410(c).

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

1. The Permittee shall meet the applicable requirements for each closed vent system to comply with the emission standards for reciprocating compressor, EU 18, as specified in §60.5411(a).

2. The Permittee shall meet the applicable requirements for each cover and closed vent system to comply with the emission standards for storage vessel, EU 16, and associated vapor combustor, EU 22, as specified in §60.5411(b) and (c).

3. The Permittee shall meet the applicable requirements for control device, EU 22, used to comply with the emission standards for storage vessel, EU 16, as specified in §60.5412(d).

OBSERVATION: The reciprocating compressor, EU 18, does not operate a closed vent system, therefore the permit requirements of §60.5411(a), condition G.1 of this permit above, do not apply.

OBSERVATION: Performance tests for the ECD were conducted according to Method 25A per § 60.5413(b) on November 18, 2020. Targa elected to comply with the requirement of § 60.5412(d)(1)(iv)(B) which is to reduce the concentration of TOC in the exhaust gases at the outlet to the device to a level equal to or less than 275 parts per million by volume as propane on a wet basis corrected to 3 percent oxygen. The performance test showed the ECD is capable of complying with this requirement.

Performance test results: 106.1 ppmv @ 3% O2 wet basis.

Area of Concern: EPA inspectors detected continuous venting emissions from the CVS for the storage vessels when viewed with the FLIR camera (MOV_3309.mp4). Two storage tanks, one produced water and one condensate tank, were located at the facility, both have emissions routed in the same manifolded CVS.

The enclosed combustion device (ECD) was continuously venting unburned hydrocarbon emissions as seen on the FLIR camera (MOV_3310.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: 82071). A pilot was not visible however a Targa representative called the operations team who confirmed a pilot was on and the control panel noted the pilot was lit. The temperature probe on the Tripoint screen noted the temperature inside the stack of the ECD was 117°F.

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

1. The Permittee shall demonstrate that the control device, EU 22, achieves the performance requirements of reducing VOC emissions by 95.0% by weight or greater from storage vessel, EU 16, using the performance test methods and procedures specified in this section according to §60.5413.

2. The Permittee shall demonstrate continuous compliance with the standards for reciprocating compressor, EU 18, and the storage vessel facility EU 16 and associated control device EU 22, according to §60.5415(c) and (e), respectively.

OBSERVATION: The reciprocating compressor associated with EU 18 demonstrates continuous compliance according to § 60.5415(c) to continuously monitor the number of hours of operation. Records provided by Targa show that Targa monitors these hours of operation in the NSPS OOOO annual reports.

OBSERVATION: Performance tests for the ECD were conducted according to Method 25A per § 60.5413(b) on November 18, 2020. Targa elected to comply with the requirement of § 60.5412(d)(1)(iv)(B) which is to reduce the concentration of TOC in the exhaust gases at the outlet to the device to a level equal to or less than 275 parts per million by volume as propane on a wet basis corrected to 3 percent oxygen. The performance test showed the ECD is capable of complying with this requirement.

Performance test results: 106.1 ppmv @ 3% O2 wet basis.

Area of Concern: According to information provided by Targa in both the SIXMON and TVACC sent by Targa February 15, 2023, shown in Table 8 below, Targa exceeded the condensate throughput limit of 1,668,399 gallons per year. It was noted that the final throughput was 1,674,078 gallons by 12/31/2022. While this permit does not contain a throughput limit for condensate, the gallons per year were initially a conservative estimate for maximum throughput of condensate to Blue Buttes established by Targa. As specified in § 60.5413(b)(5)(ii), Targa must conduct subsequent performance tests to establish a new operating limit. The ECD was continuously venting emissions as seen on the FLIR camera and the higher tank throughput should be accounted for according to § 60.5413(b)(5)(ii) with the higher throughput estimates that Targa has established. EPA has concerns that the ECD may need to be optimized as specified by the manufacturer to account for increased throughputs.

Area of Concern: EPA inspectors detected venting emissions from the CVS for the storage vessels when viewed with the FLIR camera (MOV_3309.mp4). Two storage tanks, one produced water and one condensate tank, were located at the facility, both have emissions routed in the same manifolded CVS.

The enclosed combustion device (ECD) was continuously venting unburned hydrocarbon emissions as seen on the FLIR camera (MOV_3310.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: 82071). A pilot was not visible however a Targa representative called the operations team who confirmed a pilot was on and the control panel noted the pilot was lit. The temperature probe on the Tripoint screen noted the temperature inside the stack of the ECD was 117°F.

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

1. The Permittee shall inspect each storage vessel and reciprocating compressor cover, closed vent or bypass system and comply with the requirements according to the procedures and schedule according to §60.5416(a)-(c).

2. The Permittee shall meet the applicable storage vessel requirements to demonstrate continuous compliance according to §60.5417(h).

OBSERVATION: The reciprocating compressor, EU 18, does not operate a closed vent system, therefore the permit requirements of § 60.5416(a)-(c), condition I.1 of this permit above, do not apply to the reciprocating compressors at Blue Buttes.

Area of Concern: Targa reported that it discovered two sources that were venting emissions from a flange connector on EU 1 (which is subject to NSPS OOOOa but retained in this section for informational purposes) and thief hatch associated with a condensate tank (subject to NSPS OOOO) on October 25, 2022 and did not repair the flange connector associated with EU 1 until January 13, 2023 and the thief hatch until January 6, 2023. Targa made no attempt at repair within 5 calendar days as

specified in § 60.5416(c)(4)(i) nor was the repair completed within 30 calendar days as specified in § 60.5416(c)(4)(ii). Targa initially stated this was due to cold weather however records (such as monthly CVS surveys and stack test data) show that operations at Blue Buttes and other nearby facilities owned and operated by Targa were accessible. National Weather Service data also shows average conditions through late December, 2022. Additionally, Targa provided monthly NSPS OOOO/OOOOa inspection forms during the records review showing that personnel were able to access the facility. Targa then indicated that a new internal communications database was enacted throughout the company as a better preventative maintenance scheduling recordkeeping software. Therefore, for the condensate tank subject to NSPS OOOO, the thief hatch emissions persisted for 73 days.

A response from Targa regarding these two occurrences is below:

"These two leaks were not repaired within the 30-day timeframe. In addition to the adverse wintry weather conditions, drifting snow and travel advisories prohibited access to the sites.

Our new Maximo system is a sophisticated electronic software tracking system that enables us to monitor costs, perform preventative maintenance scheduling and utilization of equipment and is multi-disciplinary throughout all levels of our organization. The learning curve company-wide has been steep however we are gradually realizing the benefits as the system is becoming increasingly more effective with the progression of time as our collective knowledge base increases. Going forward we will track dPs with Maximo and insert steps to ensure and maintain compliance. "

Area of Concern: EPA inspectors detected venting emissions from the CVS for the storage vessels when viewed with the FLIR camera (MOV_3309.mp4). Two storage tanks, one produced water and one condensate tank, were located at the facility, both have emissions routed in the same manifolded CVS.

The enclosed combustion device (ECD) was continuously venting unburned hydrocarbon emissions as seen on the FLIR camera (MOV_3310.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: 82071). A pilot was not visible however a Targa representative called the operations team who confirmed a pilot was on and the control panel noted the pilot was lit. The temperature probe on the Tripoint screen noted the temperature inside the stack of the ECD was 117°F.

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

1. The Permittee shall perform the notification, reporting, and recordkeeping requirements for each reciprocating compressor affected facility, EU 18, and each storage vessel affected facility EU 16 and associated control device, EU 22, as specified in §60.5420.

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

<u>NSPS OOOOa</u>

OBSERVATION: Due to a modification in 2020, Blue Buttes engines EU 1 and EU 2 triggered NSPS OOOOa for reciprocating compressor engines for which a modification commenced after September 18, 2015. Therefore, EPA inspectors assessed Blue Buttes emission units EU 1, EU 2 and fugitive emissions for compliance as those emission units are subject to requirements as specified in NSPS OOOOa.

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

OBSERVATION: As specified in § 60.5385(a), EU 1 and EU 2 shall replace the reciprocating compressor rod packing either: Before the compressor has operated for 26,000 hours or prior to 36 months from the date of the most recent rod packing replacement. In the information provided by Targa, Targa has

elected to comply with the requirement to change the rod packing before the compressor has operated for 26,000 hours according to § 60.5385(a)(1).

Area of Concern: During the records review, EPA inspectors requested NSPS OOOOa rod packing reports and records. Targa did not provide these records regarding rod packing replacements.

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

Area of Concern: Targa reported that it discovered two sources that were venting emissions from a flange connector on EU 1 (subject NSPS OOOOa) and thief hatch associated with a condensate tank (subject to NSPS OOOO but retained in this section for informational purposes) on October 25, 2022 and did not repair the flange connector associated with EU 1 until January 13, 2023 and the thief hatch until January 6, 2023. Targa made no attempt at repair within 30 calendar days as specified in § 60.5397a(h)(1) nor was the repair completed within 30 calendar days as specified in § 60.5397a(h)(2). Targa initially stated this was due to cold weather however records show that operations at Blue Buttes and other nearby facilities owned and operated by Targa were accessible. National Weather Service data also shows average conditions through late December, 2022. Additionally, Targa provided monthly NSPS OOOO/OOOOa inspection forms during the records review showing that personnel were able to access the facility. Targa then indicated that a new internal communications database was enacted throughout the company as a better preventative maintenance scheduling recordkeeping software. Therefore, for the condensate tank subject to NSPS OOOO, the flange connector on EU 1 emissions persisted for 80 days.

A response from Targa, provided on April 4, 2023, is included regarding these two occurrences below:

"These two leaks were not repaired within the 30-day timeframe. In addition to the adverse wintry weather conditions, drifting snow and travel advisories prohibited access to the sites.

Our new Maximo system is a sophisticated electronic software tracking system that enables us to monitor costs, perform preventative maintenance scheduling and utilization of equipment and is multi-disciplinary throughout all levels of our organization. The learning curve company-wide has been steep however we are gradually realizing the benefits as the system is becoming increasingly more effective with the progression of time as our collective knowledge base increases. Going forward we will track dPs with Maximo and insert steps to ensure and maintain compliance. "

Area of Concern: The inlet seperator had a component or controller that was venting emissions as seen via FLIR and GMAP (MOV_0313.mp4).

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

OBSERVATION: Initial compliance was determined during previous inspections and was not evaluated during the 2023 inspection. According to information provided by Targa, the reciprocating compressors demonstrate initial compliance according to § 60.5410a(c) to continuously monitor the number of hours of operation.

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

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

OBSERVATION: According to information provided by Targa, the reciprocating compressors associated with EU 1 and EU 2 demonstrate continuous compliance according to § 60.5415a(c) to each continuously monitor the number of hours of operation.

OBSERVATION: Targa provided reports documenting periodic monitoring and repair according to § 60.5415a(h).

Area of Concern: Targa reported that it discovered two sources that were venting emissions from a flange connector on EU 1 (subject NSPS OOOOa) and thief hatch associated with a condensate tank (subject to NSPS OOOO but retained in this section for informational purposes) on October 25, 2022 and did not repair the flange connector associated with EU 1 until January 13, 2023 and the thief hatch until January 6, 2023. Targa made no attempt at repair within 30 calendar days as specified in § 60.5397a(h)(1) nor was the repair completed within 30 calendar days as specified in § 60.5397a(h)(2). Targa initially stated this was due to cold weather however records show that operations at Blue Buttes and other nearby facilities owned and operated by Targa were accessible. National Weather Service data also shows average conditions through late December, 2022. Additionally, Targa provided monthly NSPS OOOO/OOOOa inspection forms during the records review showing that personnel were able to access the facility. Targa then indicated that a new internal communications database was enacted throughout the company as a better preventative maintenance scheduling recordkeeping software. Therefore, for the condensate tank subject to NSPS OOOO, the flange connector on EU 1 emissions persisted for 80 days.

A response from Targa, provided on April 4, 2023, is included regarding these two occurrences below:

"These two leaks were not repaired within the 30-day timeframe. In addition to the adverse wintry weather conditions, drifting snow and travel advisories prohibited access to the sites.

Our new Maximo system is a sophisticated electronic software tracking system that enables us to monitor costs, perform preventative maintenance scheduling and utilization of equipment and is multi-disciplinary throughout all levels of our organization. The learning curve company-wide has been steep however we are gradually realizing the benefits as the system is becoming increasingly more effective with the progression of time as our collective knowledge base increases. Going forward we will track dPs with Maximo and insert steps to ensure and maintain compliance. "

Area of Concern: The inlet seperator had a component or controller that was venting emissions as seen via FLIR and GMAP (MOV_0313.mp4).

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

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

OBSERVATION: Targa provided fugitive emissions reports that were reported according to NSPS OOOOa

Area of Concern: During the records review, EPA inspectors requested NSPS OOOOa rod packing reports and records. Targa did not provide these records regarding rod packing replacements for EU 1 and EU 2.

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 7 in Table 2 of this permit;

2. The Permittee has determined that the facility it is not a major source but has actual emissions of 5 tpy or more of a single hazardous air pollutants (HAP), or 12.5 tpy or more of a combination of HAP

(*i.e.,* 50% of the major source thresholds), and shall update its major source determination within 1 year of the prior determination, and each year thereafter, using gas composition data measured during the preceding 12 months.

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

B. General Standards [40 CFR 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.

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 7 such that the actual glycol circulation rate does not exceed the optimum glycol circulation rate determined in accordance with paragraph (a) of this section. If EU 7 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 7 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: EPA inspectors did not view any emissions through the FLIR coming from the dehydration unit at Blue Buttes. The dehydration unit at Blue Buttes does not operate a control device. Targa has not reported any process changes since the 2020 permit modification. The dehydration unit glycol pump, model Kimray 21020 PV, was counted to pump at approximately 10 strokes per minute, which is approximately 1.1 gpm according to specification sheets from Kimray. Targa indicated in their dehydration annual report that the glycol circulation rate was 1.17, which is less than EPA inspectors noted onsite. Additionally, the report noted that the gas throughput at Blue Buttes was 8.85 MMscf/d and the inlet at the day of inspection, June 15, 2023 was noted to be 7.0 MMscf/d at the inlet.

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.

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: EPA inspectors did not view any emissions through the FLIR coming from the dehydration unit at Blue Buttes. The dehydration unit at Blue Buttes does not operate a control device. Targa has not reported any process changes since the 2020 permit modification.

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: EPA inspectors did not view any emissions through the FLIR coming from the dehydration unit at Blue Buttes. The dehydration unit at Blue Buttes does not operate a control device. Targa has not reported any process changes since the 2020 permit modification.

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).

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

OBSERVATION: EPA inspectors did not view any emissions through the FLIR coming from the dehydration unit at Blue Buttes.

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 dehydration unit at Blue Buttes does not operate a control device. Therefore, this permit condition is not applicable.

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 (UA) plus offset and urban cluster (UC) boundary as specified in §63.774(f).

6. The Permittee shall maintain records, pursuant to §63.774(g), of the occurrence and duration of each malfunction of operation (*i.e.,* process equipment) or the air pollution control equipment and monitoring equipment. The Permittee shall maintain records of actions taken during periods of malfunction to minimize emissions in accordance with § 63.764(j), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

OBSERVATION: Targa was able to supply information during the records review.

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: No periodic reports are required for area source dehydration units located outside of UA plus offset and UC boundaries. Targa has not reported any process changes since the 2020 permit modification.

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), the determination of actual average benzene or BTEX emissions from a glycol dehydration unit shall be made using the model GRI–GLYCalcTM, Version 3.0 or higher, and the procedures presented in the associated GRI–GLYCalcTM Technical Reference Manual.

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]

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

1. Caterpillar G35 16LE engine identified as Emissions Unit EU 1 in Table 2 of this permit;

2. Caterpillar G35 12LE engine identified as Emissions Unit EU 2 in Table 2 of this permit;

3. Waukesha L5774LT engine identified as Emissions Unit EU 18 in Table 2 of this permit;

4. Cummins KTA19GC engine identified as Emissions Unit EU 23 in Table 2 of this permit;

5. Cummins KTA19GC engine identified as Emissions Unit EU 24 in Table 2 of this permit; and

6. NG Engines PSI 8.1L T engine identified as Emissions Unit EU 25 in Table 2 of this permit.

OBSERVATION: Targa submitted a permit modification in 2020 documenting facility changes that increased the HAP emissions above major source thresholds. Therefore, each engine shall be evaluated as a major source.

The permit will be modified during the renewal process when the current permit expires. At the issuance of this permit, V-TAT-000676-2014.00, did not include major source standards of MACT ZZZZ.

B. General Provisions [40 CFR 63.6665]

1. The General Provisions at 40 CFR part 63, subpart A apply as specified in Table 8 of 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 [40 CFR 63.6590(c)(4)]

For Emissions Units EU 1, EU 2, EU 18, EU 23, EU 24 and EU 25, the Permittee shall meet the requirements of Subpart ZZZZ by meeting the requirements of Subpart JJJJ, for stationary SI ICE. No further requirements apply to emissions units EU 1, EU 2, EU 18, EU 23, EU 24 or EU 25 under 40 CFR part 63. The applicable requirements of Subpart JJJJ are specified in Section II of this permit.

[Explanatory Note: Emissions Units EU 1, EU 2 and EU 18 are considered new RICE because of their construction date and must meet the requirements of Subpart ZZZZ by meeting the requirements of Subpart JJJJ; however, they were manufactured prior to January 1, 2008 and therefore, are not subject to any requirements of Subpart JJJJ. Emissions Units EU 1, EU 2 and EU 18, therefore, are not identified in Section II of this permit as being subject to the requirements of Subpart JJJJ as of the issuance of this Permit.]

OBSERVATION: Targa submitted a permit modification in 2020 documenting facility changes that increased the HAP emissions above major source thresholds. The permit will be modified during the renewal process when the current permit expires. At the issuance of this initial permit, V-TAT-000676-

2014.00, did not include major source standards of MACT ZZZZ. Therefore, each engine shall be evaluated as a major source.

EU 23, EU 24 and EU 25 (all three removed) are new SI 4SRB stationary RICE with a site rating of less than 500 hp located at a major source of HAP emissions and comply with MACT ZZZZ by complying with the requirements of NSPS JJJJ, as specified in § 63.6590(c)(4).

EU 1, EU 2 and EU 18 have additional requirements in MACT ZZZZ in addition to the NSPS JJJJ requirements. The engines are subject to MACT ZZZZ as new stationary RICE because they each have a site rating of more than 500 hp located at a major source of HAP emissions and commenced construction after December 19, 2002 as specified in § 63.6590(a)(2)(i).

Targa complies with the requirements for these engines, EU 1, EU 2 and EU 18 by complying with Table 2a.2 for emission limitations of new 4SLB engines with greater than 250 hp at a major source of HAP according to MACT ZZZZ shown below:

For each	You must meet the following emission limitation, except during periods of startup	During periods of startup you must
4SLB stationary RICE	b. Limit concentration of formaldehyde in the stationary RICE exhaust to 14 ppmvd or less at 15 percent O2	Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

Targa must comply with Table 2b.1 of MACT ZZZZ which states each engine, EU 1, EU 2 and EU 18, must meeting the operating limitation of maintaining each catalyst so that the pressure drop across the catalyst does not change by more than 2 inches of water at 100 percent load plus or minus 10 percent from the pressure drop across the catalyst that was measured during the initial performance test; and maintain the temperature of your stationary RICE exhaust so that the catalyst inlet temperature is greater than or equal to 450 °F and less than or equal to 1350 °F.

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

EU-18: EPA inspectors recorded 8776 instances of temperature deviations for EU-18. Which is about 12.2% of operating time errors for temperature sensor deviations.

EU-1: EPA inspectors recorded 6923 instances of temperature deviations for EU-1. Which is about 11.4% of operating time errors for temperature sensor deviations.

EU-2: EPA inspectors recorded 10972 instances of temperature deviations for EU-2. Which is about 17.5% of operating time errors for temperature sensor deviations.

Monthly pressure (dP) reading reviews showed that Targa missed the monthly pressure readings in June and September of 2020; January and June of 2021 for all engines at Blue Buttes. Additionally, most of the temperature deviations appeared to be failures to record actual values. As noted in certain MACT ZZZZ reports in Table 6 below, Targa has issues with random zeroes in the temperature data output. EPA inspectors reviewed the information provided during the records review and the instances of temperature deviations noted above are consistent with primarily the dataset recording zeroes. Therefore, it cannot be determined if the operating limitations are being met during these instances.

Area of concern: According to information provided by Targa, EU 1 and EU 2 both missed pre-catalytic data from October 17, 2022 through November 10, 2022. Targa found EU 1 had pre-catalyst temperatures less than 750 and greater than 1250 F for 9,533 minutes and EU2 had pre-catalyst temperatures less than 750 and greater than 1250 F for 27,783 minutes during the second half 2022 MACT ZZZZ semiannual report. Targa did not include the duration of missing electronic data initially to the deviation as a percent of operating time per engine, this would be approximately 22.94% for EU 1 and approximately 27.71% for EU 2 during the six-month period between July 1, 2022 and December 31, 2022.

OBSERVATION: It appeared that Targa was proactive in re-testing engines if the dP deviated beyond +/-2 inches of H2O. The engines were tested within 30 days when the pressure limit was exceeded April 8, 2023 for EU-2 and June 7, 2023 for EU-1. Targa has promptly reestablishes the values of the engine operating parameters, and also conducted a performance test to demonstrate compliance with the required emission limitation applicable as specified in § 63.6640(b).

According to Table 3 of MACT ZZZZ, Targa must conduct performance tests at EU 1, EU 2 and EU 18 semiannually (After the operator has demonstrated compliance for two consecutive tests, the operator may reduce the frequency of subsequent performance tests to annually). See Table 5 below for recent performance tests. According to the requirements for performance tests in § 63.6640 Targa uses ASTM D6348-03 to conduct 3 x 1 hour test runs to determine compliance with the emissions limit of 14 ppmvd or less at 15 percent O2 of formaldehyde.

Table 5: MACT ZZZZ Performance Tests

Emission Unit ID	Test Date	CH2O ppmvd @15%O2	Avg. Catalyst Inlet Temp(F°)	Avg dP (inches H20)	Avg. Load (%)	Engine Runtime Hours
#3 EU-18	12/30/2020	2.08	946	2.7	91	43363
#1 (EU 2)	1/13/2022	2.32	814	2.8	91.35	57659
#2 (EU 1)	1/13/2022	0.57	821	5.8	91.81	59080
EU-18	12/21/2021	7.81	770	3.7	90.63	50154
#1 (EU 2)	2/1/2023	4.79	833	3.9	90.05	64520
#2 (EU 1)	2/2/2023	3.46	810	8	94.4	66091
EU-18	3/1/2023	9.45	795	1.9	90.52	58638

Area of Concern: Targa has not included information on EU 18 in the annual and semi-annual reports as specified in § 63.6650(b). EU 18 has become subject to MACT ZZZZ requirements since the 2020 modification at Blue Buttes according to information provided by Targa in the permit modification. Information from those reports is shown below in Table 6.

Table 6: Semiannual MACT ZZZZ reports

Reporting Period	Deviations	Notes
1/1/2021-6/31/2021	●No CMS downtime noted during this period. ●EU-1 Recorded 60 minutes of malfunction events (0.03% deviation as a % of operating time) ●EU-2 recorded 75 minutes of malfunction events (0.04% deviation as a % of operating time)	EU-18 not included in report

7/1/2021-12/31/2021	●According to information provided by Targa, random zeroes in the temperature data output were experienced during this reporting period and are believed to originate from a software communications problem. ●No CMS downtime noted during this period. ●EU-1 Recorded 75 minutes of malfunction events (0.04% deviation as a % of operating time) ●EU-2 recorded 9960 minutes of malfunction events (4.72% deviation as a % of operating time)	EU-18 not included in report
1/1/2022-6/30/2022	●From 7:58 on February 25, 2022 through 20:51 on February 27, 2022 (3,653 total minutes) for engine EU1. ●From 8:13 on February 25, 2022 through 20:51 on February 27, 2022 (3,638 total minutes) for engines EU2. ● From 14:31 on March 17, 2022 through 14:46 on March 17, 2022 (15 total minutes) for engine EU1. ●From 13:16 on March 17, 2022 through 13:31 on March 17, 2022 and from 14:31 on March 17, 2022 through 13:31 on March 17, 2022 (30 total minutes) for engine EU2. ● From 10:15 on June 30, 2022 through 10:28 on June 30, 2022 (13 total minutes) for engine EU1. ●For each occurrence above, there were multiple malfunctions periods of recorded temperature that displayed 0°F for EU-1 and EU-2. ●The engines were operating and valid temperatures were recorded both before and after these malfunction periods. ●Deviation as a percent of operating time per engine: EU1 (2.47%), EU2 (3.42%). ●CMS certification/audit occurred January 2022.	MACT ZZZZ report does not contain information for EU-18. Engines are no longer "gap" engines and subject to MACT ZZZZ since 2020 modification.
7/1/2022-12/31/2022	●From 1:59 PM on October 17, 2022 through 9:30 am on November 10, 2022 (34,291 total minutes) for engine EU1 and EU2, the pre-catalyst temperature data for both engines experienced a period of missing electronic data. ●Targa found EU1 had precatalyst temperatures less than 750 and greater than 1250 F for 9533 minutes. ●Targa found EU2 had precatalyst temperatures less than 750 and greater than 1250 F for 27,783 minutes. ●Deviation as a percent of operating time per engine: EU1 (4.99%), EU2 (12.4%).	Targa did not include duration of missing electronic data due to failed/missing monitoring data. Corrected deviation as a percent of operating time per engine should actually be: EU1 (22.94%), EU2 (27.71%) Targa did not include EU-18 information in MACT ZZZZ report.

Area of Concern: Comparing the temperature deviations with the raw data that was provided by Targa shows a discrepancy between deviations as a percent of operating time per engine compared to what is in the MACT ZZZZ reports. Targa also has not included EU-18 in the MACT ZZZZ semiannual reports.

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

EU-18: EPA inspectors recorded 8776 instances of temperature deviations for EU-18. Which is about 12.2% of operating time errors for temperature sensor deviations.

EU-1: EPA inspectors recorded 6923 instances of temperature deviations for EU-1. Which is about 11.4% of operating time errors for temperature sensor deviations.

EU-2: EPA inspectors recorded 10972 instances of temperature deviations for EU-2. Which is about 17.5% of operating time errors for temperature sensor deviations.

Area of Concern: Targa must install CPMS to continuously monitor catalyst inlet temperature and pressure drop across the catalyst according to the requirements in § 63.6625(b) as specified in Table 5.7 of MACT ZZZZ to demonstrate continuous compliance. See above for discussion on temperature errors. Most of the temperature deviations appeared to be failures to record actual values. As noted in certain MACT ZZZZ reports in Table 6 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).

Lastly, 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 Blue Buttes, the issues still persist.

Area of Concern: During the record review, EPA inspectors noted that certain work orders at Blue Buttes did not provide enough information to determine what was being addressed for engines. As specified in 63.6655(a)(4 and 5), Targa must maintain records of all required maintenance performance on the air pollution control and monitoring equipment, and maintain records of actions taken during periods of malfunction to minimize emissions. Targa does not maintain records that can determine the facts of the work orders. On April 20, 2023, an email from Targa discussed a catalyst replacement for EU 2 yet the supplied work order did not correctly indicate parts replaced or the correct details noting that Targa initially noted the catalyst was determined to need replacement. 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 260105 for Unit 1 does not describe the specific engine at Blue Buttes, nor does it contain the engine operating hours at the time of the 2160 hr maintenance or the specific maintenance conducted.

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 HAP is not subject to a relevant standard or other requirement

established under 40 CFR part 63, the Permittee shall keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination shall include an analysis (or other information) that demonstrates why the Permittee believes the source is unaffected (e.g., because the source is an area source). [40 CFR 63.10(b)(3)]

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

OBSERVATION: Targa provided records upon request during the records review. Targa did not provide reports regarding the NSPS OOOOa rod packing replacements.

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

1. The Permittee shall submit to the EPA all reports of any required monitoring under this permit semiannually. The first report shall cover the period from the effective date of this permit through December 31, 2020. Thereafter, the report shall be submitted semi-annually, by April 1st and October 1st of each year. The report due on April 1st shall cover the 6-month period ending on the last day of December before the report is due. The report due on October 1st shall cover the 6-month period ending on the last day of June before the report is due. All instances of deviations from permit requirements shall be clearly identified in such reports. All required reports shall be certified by a responsible official consistent with the Submissions section of this permit.

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

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

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

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

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

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

   (a) Any definition of "prompt" or a specific time frame for reporting deviations provided in an underlying applicable requirement as identified in this permit.
   (b) Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations will be submitted based on the following schedule:
      (i) For emissions of a HAP or a toxic air pollutant (as identified in the applicable regulation) that continue for more than 1 hour in excess of permit requirements, the report shall be made within 24 hours of the occurrence.

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

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

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

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

OBSERVATION: Targa submits forms according to this permit requirement. See Table 8 below for more information.

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 1st. The fee shall cover the previous calendar year.

3. The fee payment shall be in United States currency and shall be paid by money order, bank draft, certified check, corporate check, or electronic funds transfer payable to the order of the U.S. Environmental Protection Agency.

4. The Permittee shall send fee payment and a completed fee filing form to:

For regular U.S. Postal Service mail (FedEx, Airborne, DHL, and UPS)	**For non-U.S. Postal Service express mail**
U.S. Environmental Protection Agency FOIA and Miscellaneous Payments Cincinnati Finance Center P.O. Box 979078 St. Louis, Missouri 63197-9000	U.S. Bank Government Lockbox 979078 U.S. EPA FOIA & Misc. Payments 1005 Convention Plaza SL-MO-C2-GL St. Louis, Missouri 63101

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

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

6. Basis for calculating annual fee:

(a) The annual emissions fee shall be calculated by multiplying the total tons of actual emissions of all "regulated pollutants (for fee calculation)" emitted from the source by the presumptive emissions fee (in dollars per ton) in effect at the time of calculation.

(i) "Actual emissions" means the actual rate of emissions in tpy of any regulated pollutant (for fee calculation) emitted from a Part 71 source over the preceding calendar year. Actual emissions shall be calculated using each emissions unit's actual operating hours, production rates, in-place control equipment, and types of materials processed, stored, or combusted during the preceding calendar year.

(ii) Actual emissions shall be computed using methods required by the permit for determining compliance, such as monitoring or source testing data.

(iii) If actual emissions cannot be determined using the compliance methods in the permit, the Permittee shall use other federally recognized procedures.

(iv)

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

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

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

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

(ii) Actual emissions of any regulated pollutant (for fee calculation) already included in the 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 Blue Buttes. See Table 7 below:

Table 7: Fee year and annual actual emissions

Fee Year	NOx	VOC	SO_2	PM_{10}	HAP Total	Fee Paid
2020	45.9	161.2	0.05	1.02	13.8	$11,356.80
2021	47.0	150.3	0.05	0.02	11.86	$11,768.94
2022	40.76	146.89	0.04	0.85	9.11	$11,969.66

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

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

2. The annual emissions report shall be submitted to the EPA at the address listed in the Submissions section of this permit.

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

OBSERVATION: See Table 7 above. Targa submits actual emissions inventory along with annual Title V fees.

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

1. Compliance with the Permit

   (a) The Permittee must comply with all conditions of this Part 71 permit. Any permit noncompliance constitutes a violation of the CAA and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

   (b) It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

   (c) For the purpose of submitting compliance certifications in accordance with §71.6(c)(5), or establishing whether or not a person has violated or is in violation of any requirement of this permit, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

2. Compliance Schedule [40 CFR 71.5(c)(8)(iii)]

   (a) For applicable requirements with which the source is in compliance, the source will continue to comply with such requirements.

(b) For applicable requirements that will become effective during the permit term, the source shall meet such requirements on a timely basis.

3. Compliance Certifications [40 CFR 71.6(c)(5)]

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

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

(b) The compliance certification shall be certified as to truth, accuracy, and completeness by a responsible official consistent with 40 CFR 71.5(d).

(c) The certification shall include the following:

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

OBSERVATION: Targa submits documentation of TV annual compliance (TVACC's) and SIXMON reports, shown in Table 8 below.

Area of Concern: The SIXMON and TVACC's should contain the reporting elements as described in this permit. Including, but not limited to: elements such as engine temperature and pressure deviations for all engines subject to MACT ZZZZ. Deviations were found between 1/1/2021 up through the date of inspection during the records review yet shown below Targa reported no deviations during certain periods. See Table 8 below:

Table 8: TVACC and SIXMON Reports

Sent	Report Type	Reporting Period	Deviations
9/24/2021	SIXMON	1/1/2021-6/30/2021	No deviations reported
1/18/2022	SIXMON	7/1/2021-12/31/2021	No deviations reported
1/18/2022	ACC	1/1/2021-12/31/2021	No deviations reported
7/29/2022	SIXMON	1/1/2022-6/30/2022	No deviations reported

2/15/2023	**SIXMON**	**7/1/2022-12/31/2022**	**Targa reported the following deviations:** **●Permit term: VI.B.2(a). Exceeded condensate throughput limit of 1,668,399 gallons per year. Final throughput was 1,674,078 gallons by 12/31/2022.** **●Permit term: VI.B.2(c). Missing electronic pre-catalyst data for 34,291 minutes in addition to other failed pre-cat data as reported in MACT ZZZZ semiannual report.** **●Permit term: VI.B.3(b)(iii). EU1 and EU2:These engines were scheduled for emissions testing to occur on December 22, 2022 however because of extreme wintry conditions the tests were postponed and successfully emissions tested 2/1-2/23** **●Permit term: VI.B.3(b)(iii). EU-18 This engine was scheduled for emissions testing to occur on December 22, 2022 however because of extreme wintry conditions the tests were postponed and successfully emissions tested March, 2023 (mechanical problems prohibited earlier testing).** **●Permit term: III.A.1. Inability to repair OOOOa leak greater than 30 days.**

2/15/2023	**TVACC**	**1/1/2022-12/31/2022**	**Targa reported the following deviations:** **●Permit term: VI.B.2(a). Exceeded condensate throughput limit of 1,668,399 gallons per year. Final throughput was 1,674,078 gallons by 12/31/2022.** **●Permit term: VI.B.2(c). Missing electronic pre-catalyst data for 34,291 minutes in addition to other failed pre-cat data as reported in MACT ZZZZ semiannual report.** **●Permit term: VI.B.3(b)(iii). EU1 and EU2:These engines were scheduled for emissions testing to occur on December 22, 2022 however because of extreme wintry conditions the tests were postponed and successfully emissions tested 2/1-2/23** **●Permit term: VI.B.3(b)(iii). EU-18 This engine was scheduled for emissions testing to occur on December 22, 2022 however because of extreme wintry conditions the tests were postponed and successfully emissions tested March, 2023 (mechanical problems prohibited earlier testing).** **●Permit term: III.A.1. Inability to repair OOOO leak greater than 15 days.**

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. Targa did not provide reports regarding the NSPS OOOOa rod packing replacements.

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: Targa submitted a permit modification for Blue Buttes in 2020. The permit modification will take affect at the next permit renewal period when reissued by the EPA.

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: Targa submitted a permit modification for Blue Buttes in 2020. The permit modification will take affect at the next permit renewal period when reissued by the EPA.

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 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.

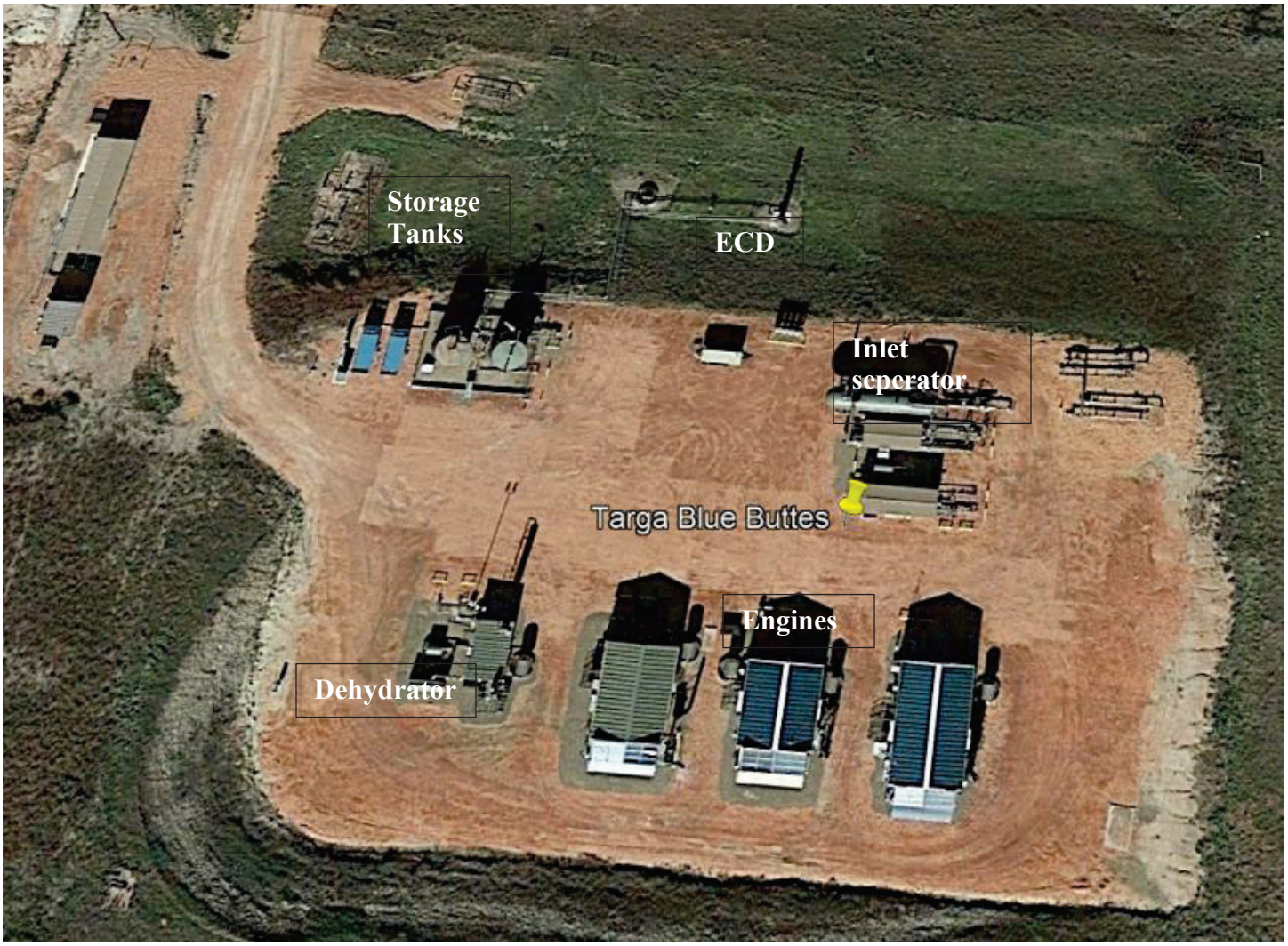
3. If the Permittee submits a timely and complete permit application for renewal, consistent with 40 CFR 71.5(a)(2), but the EPA has failed to issue or deny the renewal permit, then all the terms and conditions of the permit, including any permit shield granted pursuant to 40 CFR 71.6(f) shall remain 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_3309	Tank emissions	A. North
MOV_3310	ECD continuous emissions	A. North
MOV_0313	Inlet seperator emissions	P. Myers