



REGION 6

DALLAS, TX 75270

May 23, 2024

Jon Fields
Field Environmental Director
Enterprise Products Operating LLC
1100 Louisiana Street,
Houston, Texas 77002-5227

Sent via email: JEFIELDS@eprod.com

Re: Notice of Violation and Opportunity to Confer

Dear Mr. Fields:

The United States Environmental Protection Agency, Region 6 ("EPA") has identified Enterprise Products Operating ("Enterprise") as having violated the Clean Air Act ("CAA"). This Notice of Violation and Opportunity to Confer ("NOVOC") is issued to Enterprise for violations of the CAA, 42 U.S.C. § 7401 *et seq.*, at the energy extraction facility listed in the Enclosure (the "Facility"). EPA alleges violations of the CAA and the conditions of Texas's federally approved State Implementation Plan ("SIP") as incorporated into the Texas State Permits at the Facility as listed in the Enclosure. By this letter, EPA is extending to you an opportunity to advise the Agency, via a conference call or in writing, of any further information EPA should consider with respect to the violations.

This NOVOC is issued pursuant to Section 113(a)(1) of the CAA, 42 U.S.C. § 7413(a)(1), requires the Administrator of the EPA to notify any person in violation of a SIP or permit of the violations, and this NOVOC serves as such notice. The authority to issue this NOVOC has been delegated to the Director of the Enforcement and Compliance Assurance Division, EPA Region 6.

EPA contracted helicopter flyovers of the Beaumont-Port Arthur Area in Texas from November 7 through November 9, 2023, to assess emission sources using Optical Gas Imaging ("OGI") technology. On December 1, 2023, EPA sent a letter informing Enterprise of potentially unauthorized emissions from a facility that EPA believed was owned/operated by Enterprise, along with an OGI video capture for the facility. EPA asked Enterprise to verify ownership, provide current site-specific permit information, and take any necessary corrective action to address unauthorized hydrocarbon emissions. EPA considered information provided by Enterprise to determine whether violations occurred at the facility.

CAA Violations

We are sending this NOVOC to inform Enterprise of the following violations at the Facility:

Texas SIP Violations

1. Failure to comply with general requirements located at 30 Tex. Admin. Code § 116.615(2).
2. Failure to comply with emission event recordkeeping requirements for non-reportable emission events located at 30 Tex. Admin Code § 101.201(b) and 116.615(8).
3. Failure to maintain equipment in good working order and operating properly during facility operations located at 30 Tex. Admin. Code § 116.615(9).

Please review the specific violations and information we have provided in the Enclosure regarding the facility at issue.

Opportunity to Confer

This NOVOC provides you with the opportunity to confer with EPA. We request Enterprise contact Santana Marie Batts, Assistant Regional Counsel, at Batts.Santana@epa.gov or (214) 665-2213 within ten (10) business days to discuss this pending matter.

Sincerely,

Cheryl T. Seager, Director
Enforcement and
Compliance Assurance Division

Enclosure

cc: Jeanette Morrell, TCEQ (jeanette.morrell@tceq.texas.gov)
Michael De La Cruz, TCEQ (michael.delacruz@tceq.texas.gov)
Michael Miller, TCEQ (michael.miller@tceq.texas.gov)
Charles Child, Enterprise Products Operating LLC, (cjchild@eprod.com)