

STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:

ENLINK PROCESSING SERVICES, LLC,  
CROSSTEX PROCESSING SERVICES, LLC,  
SABINE PASS PLANT FACILITY JOINT  
VENTURE, ENLINK LIG LIQUIDS, LLC,  
ENLINK LOUISIANA GATHERING, LLC

AI # 17715, 13079, 19184, 25905, 39831, 859,  
32085, 184873, 3302

PROCEEDINGS UNDER THE LOUISIANA  
ENVIRONMENTAL QUALITY ACT  
LA. R.S. 30:2001, ET SEQ.

- \* Settlement Tracking No.
- SA-AE-17-0011
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- \* Enforcement Tracking No.
- \* AE-PP-09-0676
- \* AE-CN-11-01578
- \* AE-PP-13-00289
- \* AE-PP-14-00697
- \* AE-CN-15-00545
- \* WE-PP-17-00073
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- \*
- \* Docket No. 2017-2584-EQ
- \*

SETTLEMENT

The following Settlement is hereby agreed to between EnLink Processing Services, LLC, f/k/a Crosstex Processing Services, LLC, Sabine Pass Plant Facility Joint Venture, EnLink LIG Liquids, LLC, and EnLink Louisiana Gathering, LLC (“Respondents”) and the Department of Environmental Quality (“DEQ” or “the Department”), under authority granted by the Louisiana Environmental Quality Act, La. R.S. 30:2001, et seq. (“the Act”).

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Respondents are limited liability companies that own and/or operate facilities located in Acadia, Ascension, Cameron, Desoto, Evangeline, Iberville, Plaquemines, and Terrebonne Parishes, Louisiana (“the Facilities”).

## II

On October 27, 2010, the Department issued to Respondent a Notice of Potential Penalty, Enforcement No. AE-PP-09-0676, which was based upon the following findings of fact:

On or about September 9, 2009, an inspection of Eunice Gas Extraction Plant, owned and/or operated by **CROSSTEX PROCESSING SERVICES, LLC (RESPONDENT)**, was performed to determine the degree of compliance with the Louisiana Environmental Quality Act (the Act) and the Air Quality Regulations. Additionally, the Department conducted a file review for the facility on or about December 1, 2009. The facility is located at 222 Refinery Road in Eunice, Acadia Parish, Louisiana. The facility operates under Title V Air Permit No. 0040-00025-V5 issued to the Respondent on September 23, 2008.

The following violations were noted during the course of the inspection:

- A. The Respondent failed to have a system to promptly address Process Hazard Analysis (PHA) findings and recommendations. Specifically, at the time of the inspection fifteen (15) recommendations from a PHA conducted in 2005 were still unaddressed. Each failure to address PHA findings and resolve recommendations in a timely manner is a violation of 40 CFR 68.67(e), which language has been adopted as a Louisiana regulation in LAC 33:III.5901.A, Title V Air Permit No. 0040-00025-V5 Specific Requirement 251, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2). In correspondence submitted to the Department on or about February 3, 2010, the Respondent indicated that the fifteen (15) recommendations were addressed and documentation was stored with the 2005 PHA. Also, the correspondence stated that the Respondent now uses tracking software to send automatic reminders to personnel.
- B. The Respondent failed to address emergency shutdowns in written operating procedures. Specifically, the operating procedures failed to address emergency shutdown procedures, conditions upon which emergency shutdown is required, and assignment of shutdown responsibility to qualified operators. This is a violation of 40 CFR 68.69(a)(iv), which language has been adopted as a Louisiana regulation in LAC 33:III.5901.A, Title V Air Permit No. 0040-00025-V5 Specific Requirement 255, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2). In correspondence submitted to the Department on or about February 3,

2010, the Respondent stated that emergency shutdown procedures were developed and stored with the operating procedures for the plant.

- C. The Respondent failed to provide written operating procedures for startups after emergency shutdowns. This is a violation of 40 CFR 68.69(a)(vii), which language has been adopted as a Louisiana regulation in LAC 33:III.5901.A, Title V Air Permit No. 0040-00025-V5 Specific Requirement 255, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2). In correspondence submitted to the Department on or about February 3, 2010, the Respondent stated that startup procedures following emergency shutdowns for each unit and the entire plant were developed and stored with the operating procedures for the plant.
- D. The Respondent failed to include precautions necessary to prevent exposure, including engineering and administrative controls, in the operating procedures. This is a violation of 40 CFR 68.69(a)(3)(ii), which language has been adopted as a Louisiana regulation in LAC 33:III.5901.A, Title V Air Permit No. 0040-00025-V5 Specific Requirement 255, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2). In correspondence submitted to the Department on or about February 3, 2010, the Respondent stated that operating procedures were reviewed and additions were made to include appropriate engineering and administrative controls.
- E. The Respondent failed to annually certify operating procedures. Specifically, at the time of the inspection the investigator noted that the operating procedures had not been reviewed or certified in more than one year. This is a violation of 40 CFR 68.69(c), which language has been adopted as a Louisiana regulation in LAC 33:III.5901.A, Title V Air Permit No. 0040-00025-V5 Specific Requirement 257, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2). In correspondence submitted to the Department on or about February 3, 2010, the Respondent stated that the operating procedures were certified for 2009.
- F. At the time of the inspection it was noted that the Respondent's frequency of piping inspections was not consistent with manufacturer's recommendations, good engineering practices, and/or prior operating experience. This is a violation of 40 CFR 68.73(d)(3), which language has been adopted as a Louisiana regulation in LAC 33:III.5901.A, Title V Air Permit No. 0040-00025-V5 Specific Requirement 266, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2). In correspondence submitted to the Department on or about February 3, 2010, the Respondent stated that all piping inspections were completed in November 2009.
- G. The Respondent failed to document a response to each finding, and failed to document that deficiencies were corrected in a 2008 compliance audit

report. This is a violation of 40 CFR 68.79(d), which language has been adopted as a Louisiana regulation in LAC 33:III.5901.A, Title V Air Permit No. 0040-00025-V5 Specific Requirement 276, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2). In correspondence submitted to the Department on or about February 3, 2010, the Respondent stated that each of the findings in the 2008 compliance audit were addressed and documentation is stored with the 2008 compliance audit report.

- H. The Respondent self-reported in the facility's 2009 first semiannual monitoring report submitted to the Department on or about September 30, 2009, that the Respondent reported excess nitrogen oxides (NOx) emissions above the short-term permit limits. Specifically, for four (4) hours on April 30, 2009, and for two (2) hours on June 6, 2009, the Respondent operated emission source EQT0014 without water injection controls. This resulted in the combined release of 142.50 pounds excess NOx at 23.75 excess pounds per hour of NOx for a total of six (6) hours. The maximum limit for NOx emissions from EQT0014 as established in Title V Air Permit No. 0040-00025-V5 is 16.71 pounds per hour. This is a violation of LAC 33:III.905 which states, "When facilities have been installed on a property, they shall be used and diligently maintained in proper working order whenever any emissions are being made which can be controlled by the facilities, even though the ambient air quality standards in affected areas are not exceeded." Control equipment as defined by LAC 33:III.111 is "any device or contrivance, operating procedure or abatement scheme used to prevent or reduce air pollution." This is also a violation of Title V Air Permit No. 0040-00025-V5, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1) and La. R.S. 30:2057(A)(2).
- I. The Respondent self-reported in the facility's 2009 first semiannual monitoring report submitted to the Department on or about September 30, 2009, that the Respondent failed to timely submit excess emissions reports to the Department. Specifically, the Respondent failed to submit written notifications of emissions in excess of reportable quantity limits within seven (7) days of the releases mentioned in subparagraph H of this Notice. This is a violation of Title V Air Permit No. 0040-00025-V5 General Conditions R.1, LAC 33:III.501.C.4 and La. R.S. 30:2057(A)(2). The Respondent submitted the reports with the 2009 first semiannual monitoring report on or about September 30, 2009.
- J. The Respondent self-reported in the facility's 2009 first semiannual monitoring report submitted to the Department on or about September 30, 2009, that the Respondent failed to timely submit an excess emissions report within thirty (30) days of the semiannual monitoring period or July 31, 2009. This is a violation of Title V Air Permit No. 0040-00025-V5 Specific Requirement 39, LAC 33:III.501.C.4 and La. R.S. 30:2057(A)(2).

The Respondent submitted the report with the 2009 first semiannual monitoring report on or about September 30, 2009.

On March 1, 2013, the Department issued to Respondent a Consolidated Compliance Order & Notice of Potential Penalty, Enforcement No. AE-CN-11-01578, which was based upon the following findings of fact:

The Respondent owns and/or operates the Sabine Pass Gas Plant (the facility), a natural gas processing facility located approximately 20 miles west of Cameron, Cameron Parish, Louisiana. The Respondent was transferred ownership of the facility from El Paso Field Services, LP on or about November 1, 2005. The Respondent operated the facility under Title V Air Permit No. 0560-00043-V2 until the permit was modified on March 8, 2007, and Title V Air Permit No. 0560-00043-V3 was issued. On June 7, 2010, the permit was modified and Title V Air Permit No. 0560-00043-V4 was issued. The Respondent currently operates the facility under Title V Air Permit No. 0560-00043-V5 issued on November 8, 2010.

On or about November 15, 2011, the Department conducted a full compliance audit for the Chemical Accident Prevention and Minimization of Consequences Provisions set forth in LAC 33:III.5901. Additionally, the Department conducted a file review for the facility on or about January 16, 2013, to determine compliance with the permit and the Air Quality Regulations.

The following violations were discovered during the course of the inspection and file review:

- A. The Respondent failed to perform mechanical integrity inspections and tests on process equipment. Specifically, the Respondent failed to conduct annual tests on PSV-210 and annual checks on fix instrumentation covered equipment. Each failure to perform inspections and tests on process equipment is a violation of LAC 33:III.5901.A, which incorporates by reference 40 CFR 68.73(d)(1); Title V Air Permit No.

0560-00043-V5 Specific Requirement 71, LAC 33:III.501.C.4 and La. R.S. 30:2057(A)(2).

- B. The Respondent failed to document each inspection and test that has been performed on process equipment. Specifically, emergency safety device checks were not documented from 2006 through 2010. Each failure to document inspections and tests is a violation of LAC 33:III.5901.A, which incorporates by reference 40 CFR 68.73(d)(4); Title V Air Permit No. 0560-00043-V5 Specific Requirement 71 after November 8, 2010; Title V Air Permit No. 0560-00043-V4 Specific Requirement 72 after June 7, 2010, but prior to November 8, 2010; Title V Air Permit No. 0560-00043-V3 Specific Requirement 78 after March 8, 2007, but prior to June 7, 2010; Title V Air Permit No. 0560-00043-V2 Specific Requirement 8 prior to March 8, 2007; LAC 33:III.501.C.4 and La. R.S. 30:2057(A)(2).
- C. The Respondent did not have accurate piping and instrument diagrams (P&IDs) pertaining to the equipment in the process. Specifically, FCV 3-B was changed to TCV-5 by a management of change (MOC); however, the P&ID still indicated that the old equipment was in place. The failure to have accurate P&IDs for the process equipment is a violation of LAC 33:III.5901.A, which incorporates by reference 40 CFR 68.65(d)(1)(ii); Title V Air Permit No. 0560-00043-V5 Specific Requirement 71, LAC 33:III.501.C.4 and La. R.S. 30:2057(A)(2).
- D. The Respondent did not have relief system design and design basis information for the header system and loading. The failure to have relief system design and design basis information pertaining to equipment in the process is a violation of LAC 33:III.5901.A, which incorporates by reference 40 CFR 68.65(d)(1)(iv); Title V Air Permit No. 0560-00043-V5 Specific Requirement 71, LAC 33:III.501.C.4 and La. R.S. 30:2057(A)(2).
- E. The Respondent failed to address in the operating procedures conditions under which emergency shutdown is required and the assignment of shutdown responsibility to qualified operators. The failure to develop written operating procedures that include conditions requiring emergency shutdown and assignment of shutdown responsibility to qualified operators is a violation of LAC 33:III.5901.A, which incorporates by reference 40 CFR 68.69(a)(1)(iv); Title V Air Permit No. 0560-00043-V5 Specific Requirement 71, LAC 33:III.501.C.4 and La. R.S. 30:2057(A)(2).
- F. The Respondent failed to address operating limits in the operating procedures. Specifically, the Regen Gas System operating procedures indicate suction pressure of 390 to 420 psi as normal operating parameters, but also indicate 390 to 420 psi as the safe lower and upper limits. Additionally, the Expander Compressor operating procedures state to “adjust various flow rates pressure and temperature to maintain stable

operations and quality,” but then state “as set by operations management” in the safe upper and lower limits section. Each failure to address operating limits is a violation of LAC 33:III.5901.A, which incorporates by reference 40 CFR 68.69(a)(2); Title V Air Permit No. 0560-00043-V5 Specific Requirement 71, LAC 33:III.501.C.4 and La. R.S. 30:2057(A)(2).

- G. The Respondent failed to provide refresher training at least every three (3) years to each employee involved in operating a process. Specifically, the last refresher training was documented as being conducted in December 2007 at the facility. The failure to provide refresher training at least every three (3) years is a violation of LAC 33:III.5901.A, which incorporates by reference 40 CFR 68.71(b); Title V Air Permit No. 0560-00043-V5 Specific Requirement 71, LAC 33:III.501.C.4 and La. R.S. 30:2057(A)(2).
- H. The Respondent failed to establish and implement written procedures to manage changes to the process. Specifically, an MOC dated October 1, 2009, did not have changes indicated for equipment specifications, but specifications were changed, and the MOC was not routed to or approved by the departments. Additionally, the date in which the change was placed in service was not filled out on the MOC. The failure to establish and implement written procedures to manage changes to the process is a violation of LAC 33:III.5901.A, which incorporates by reference 40 CFR 68.75(a); Title V Air Permit No. 0560-00043-V3 Specific Requirement 78, LAC 33:III.501.C.4 and La. R.S. 30:2057(A)(2).
- I. The Respondent failed to update the operating procedures when a change that required an MOC resulted in a change in the process. Specifically, an MOC dated October 1, 2009, required that a procedure be written to address the change, but no procedure was written. The failure to update the operating procedures is a violation of LAC 33:III.5901.A, which incorporates by reference 40 CFR 68.75(e); Title V Air Permit No. 0560-00043-V3 Specific Requirement 78, LAC 33:III.501.C.4 and La. R.S. 30:2057(A)(2).
- J. The Respondent failed to develop a pre-startup safety review (PSSR) to confirm that safety, operating, maintenance and emergency procedures are in place and are adequate prior to the introduction of regulated substances to a process. Specifically, the PSSR was not approved, no operating procedures were drafted or made final and no affected documents were attached. The failure to develop a PSSR is a violation of LAC 33:III.5901.A, which incorporates by reference 40 CFR 68.77(b)(2); Title V Air Permit No. 0560-00043-V5 Specific Requirement 71, LAC 33:III.501.C.4 and La. R.S. 30:2057(A)(2).
- K. The Respondent failed to develop a PSSR to confirm that training of each employee involved in operating a process has been completed. The failure

to develop a PSSR is a violation of LAC 33:III.5901.A, which incorporates by reference 40 CFR 68.77(b)(4); Title V Air Permit No. 0560-00043-V5 Specific Requirement 71, LAC 33:III.501.C.4 and La. R.S. 30:2057(A)(2).

- L. The Respondent failed to inform the contract owner or operator of the known potential fire, explosion or toxic release hazards related to the contractor's work and the process. Specifically, the contractor safety video did not inform contractors of site-specific hazards. The failure to inform contractors or operators of the known potential fire, explosion or toxic release hazards is a violation of LAC 33:III.5901.A, which incorporates by reference 40 CFR 68.87(b)(2); Title V Air Permit No. 0560-00043-V5 Specific Requirement 71, LAC 33:III.501.C.4 and La. R.S. 30:2057(A)(2).

On July 21, 2014, the Department issued to Respondent a Notice of Potential Penalty, Enforcement No. AE-PP-13-00289, which was based upon the following findings of fact:

On or about June 6, 2012, an inspection of the Plaquemine Gas Plant (Agency Interest No. 19184), a natural gas processing plant, owned and/or operated by **ENLINK LIG LIQUIDS, LLC (RESPONDENT)**, was performed to determine the degree of compliance with the Louisiana Environmental Quality Act (the Act) and the Air Quality Regulations. Additionally, the Department conducted a file review for the facility on or about June 25, 2014. The facility is located at 60995 Derrick Road in Plaquemine, Iberville Parish, Louisiana. The facility operated under Title V Air Permit No. 1280-00049-V4 issued to Crosstex LIG Liquids, LLC, on December 3, 2008, which was administratively amended on July 21, 2009. The facility currently operates under Title V Air Permit No. 1280-00049-V5 issued to Crosstex LIG Liquids, LLC, on September 20, 2013. The company underwent a name change to EnLink LIG Liquids, LLC, on March 28, 2014, when Crosstex Energy merged with Devon Energy.

The following violation was noted during the course of the inspection and file review:

- A. On or about April 16, 2012, the Respondent submitted an unauthorized discharge notification report to the Department for the Plaquemine Gas Plant. The report stated that on April 9, 2012, from 3:55 pm to 6:30 pm



vapors from the facility's deethanizer were routed to Flare EF (EQT0008). Burning of the vapors caused emissions of particulate matter from the flare to exceed 20 percent opacity for approximately 2 hours and 35 minutes, exceeding one six-minute period in any 60 consecutive minutes. This is a violation of Title V Air Permit No. 1280-00049-V4AA Specific Requirement 28, LAC 33:III.1311.C, La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

- B. On or about July 30, 2013, the Respondent submitted the 2013 1<sup>st</sup> Semiannual Volatile Organic Compound (VOC) Leak Detection and Repair (LDAR) Report for the Plaquemine Gas Plant. The report stated failures to repair leaks for the following:

<b>Equipment</b>	<b>Location</b>	<b>Leak Detection Date</b>	<b>Date Placed on Delay of Repair</b>	<b>Repair Attempt Date</b>
Valve	4010 Cold Skid-C-2 Discharge	7/12/2012	7/27/2012	5/28/2012
Compressor	4410 C-8 Refrigeration Compressor	1/19/2012	1/19/2012	5/28/2012
Connector	4410-001 C-8 Refrigeration Compressor	7/14/2012	7/29/2012	5/28/2012
Connector	4410-002 C-8 Refrigeration Compressor	7/14/2012	7/29/2012	5/28/2012

The abovementioned equipment was placed on delay of repair to be repaired during the facility's May 28, 2012 shutdown; however, the leaks were not repaired. Each failure to repair leaks according to LAC 33:III.2122.C.3 is a violation of Title V Air Permit No. 1280-00049-V4 Specific Requirement 60, LAC 33:III.2122.C.3, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

On or about February 8, 2013, an inspection of the Gibson Gas Plant (Agency Interest No. 25905), a natural gas processing facility, owned and/or operated by the Respondent, was performed to determine the degree of compliance with the Act and the Air Quality Regulations. Additionally, the Department conducted a file review for the facility on or about June 25, 2014. The facility is located at 5609 Bayou Black Road in Houma, Terrebonne Parish, Louisiana. The facility was issued Title V Air Permit No. 2880-00035-V5 on September 2, 2010. The permit was modified and the facility was issued Title V Air Permit No. 2880-00035-V6 on March 25,

2013. The facility currently operates under Title V Air Permit No. 2880-00035-V7 issued on March 28, 2014.

The following violations were noted during the course of the inspection and file review:

- A. The Respondent failed to monitor nitrogen oxides, oxygen and carbon monoxide by portable analyzer six months after the previous semiannual test, plus or minus 30 days for Recompessors EQT0001, EQT0002 and EQT0004 at the Gibson Gas Plant. Specifically, the tests were due by October 31, 2011, but were not completed until November 7, 2011. Each failure to timely test stack gas concentration for nitrogen oxides, oxygen and carbon monoxide is a violation of Title V Air Permit No. 2880-00035-V5 Specific Requirement 3, Specific Requirement 6 and Specific Requirement 9, respectively; LAC 33:III.501.C.4 and La. R.S. 30:2057(A)(2).
- B. The Respondent failed to monitor inaccessible valves for total volatile organic compounds (VOCs) for Fugitive Emissions FUG0001 and FUG0003 at the Gibson Gas Plant annually for 2011. Specifically, the valves were not monitored at any time in 2011 but were monitored on or about January 25, 2012. Each failure to timely monitor inaccessible valves for total VOCs is a violation of Title V Air Permit No. 2880-00035-V5 Specific Requirement 33, LAC 33:III.2121.C.4.c, LAC 33:III.501.C.4 and La. R.S. 30:2057(A)(2).
- C. On or about March 31, 2014, the Respondent submitted the 2013 2<sup>nd</sup> Semiannual Monitoring Report for the Gibson Gas Plant. The report stated that the Respondent failed to submit a notification of the date construction of an affected facility is commenced postmarked no later than 30 days after such date. Specifically, construction began for FLASH-01 Amine Treater Flash Tank (EQT0011), STILL-01 Amine Treater Still Vent (EQT0012) and Amine Treater Fugitive Emissions (EPN F-04) on or about April 7, 2013, and for EPN Flare-02 on or about May 13, 2013; however, a construction commencement date notification was submitted until on or about December 18, 2013. Each failure to submit a timely notification is a violation of Title V Air Permit No. 2880-00035-V6 Specific Requirement 156, LAC 33:III.501.C.4 and La. R.S. 30:2057(A)(2).

On May 14, 2015, the Department issued to Respondent a Notice of Potential Penalty, Enforcement No. AE-PP-14-00697, which was based upon the following findings of fact:

On or about September 11, 2014, and May 7, 2015, a file review of **TETCO INTERCONNECT DRIP POINT** (the facility), owned and/or operated by **ENLINK LOUISIANA GATHERING, LLC (RESPONDENT)**, was performed to determine the degree of compliance with the Louisiana Environmental Quality Act (the Act) and the Air Quality Regulations. The facility is located approximately six (6) miles west of Mansfield, Desoto Parish, Louisiana. The facility currently operates under Air Permit No. 0760-00124-00, issued August 02, 1999, and effectively transferred on June 30, 2014.

The following violations were noted during the course of the file review:

- A. The Respondent became the owner/operator of the aforementioned facility on December 28, 2010. The Respondent submitted a Notification of Change Form (NOC-1) and additional information to the Department on or about June 23, 2014. The failure to submit the NOC-1 and associated documentation to the Department within forty-five (45) days after a change in ownership of a permitted facility is a violation of LAC 33:I.1907.B; LAC 33:III.517.G; and La. R.S. 30:2057(A)(2).
- B. The Respondent operated the aforementioned facility from December 28, 2010, through June 30, 2014, without a valid permit. The unauthorized operation of the facility from the date of acquisition until the permit was transferred is a violation of LAC 33:III.501.C.2 and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

On January 8, 2016, the Department issued to Respondent a Consolidated Compliance Order & Notice of Potential Penalty, Enforcement No. AE-CN-15-00545, which was based upon the following findings of fact:

The Respondent owns and/or operates the Eunice Gas Extraction Plant (the facility), a natural gas processing facility located at 222 Refinery Road in Eunice, Acadia Parish, Louisiana. The facility operated under Title V Air Permit No. 0040-00025-V5 issued to Crosstex Processing Services, LLC on September 23, 2008; Title V Air Permit No. 0040-00025-V6 issued on April 27, 2011; Title V Air Permit No. 0040-00025-V7 issued on November 10, 2011; Title V Air

Permit No. 0040-00025-V8 issued on June 11, 2012; and Title V Air Permit No. 0040-00025-V9 issued on May 1, 2013. The facility also operated under Prevention of Significant Deterioration (PSD) Permit No. PSD-LA-569(M-1) issued on May 1, 2013, to construct the Crosstex Fractionation Expansion Project. The facility currently operates under Title V Air Permit No. 0040-00025-V10 issued on February 14, 2014, and PSD Permit No. PSD-LA-569(M-2) issued on February 14, 2014, to reconcile emissions changes associated with the Crosstex Fractionation Expansion Project. The Respondent changed the company name to Enlink Processing Services, LLC effective March 28, 2014.

On or about February 5, 2014, the Department conducted a full compliance audit for the Chemical Accident Prevention Program provisions set forth in LAC 33:III.5901.

The following violations were discovered during the course of the inspection:

- A. The Respondent failed to confirm in the pre-startup safety review (PSSR) that construction and equipment were in accordance with design specifications prior to the introduction of regulated substances to a process. Specifically, in the 2013 Fractionation Expansion PSSR it was noted that pipe supports were missing and/or not properly installed and anchored. There was no verification in the PSSR that this was addressed prior to startup. This is a violation of Title V Air Permit No. 0040-00025-V9 Specific Requirement 414, LAC 33:III.5901.A, which incorporates by reference 40 CFR 68.77(b)(1), and La. R.S. 30:2057(A)(2).
- B. The Respondent failed to periodically evaluate the performance of the contract owner or operator in fulfilling their obligations. The inspection revealed that the facility's evaluation program was inadequate in that six (6) evaluations were completed for all of 2013 and two (2) were completed to date in 2014. This is a violation of Title V Air Permit No. 0040-00025-V9 Specific Requirement 433, LAC 33:III.5901.A, which incorporates by reference 40 CFR 68.87(b)(5), and La. R.S. 30:2057(A)(2).

On or about December 16, 2015, the Department conducted a file review for the facility to determine compliance with the Air Quality Regulations. The following violations were discovered during the course of the file review:

- A. The Respondent reported in the facility's 2009 2<sup>nd</sup> Semiannual Monitoring Report submitted to the Department on or about March 31, 2010, and in the facility's 2010 1<sup>st</sup> Semiannual Monitoring Report submitted to the Department on or about September 30, 2010, failures to use and diligently maintain control equipment at the facility. Specifically, the Respondent reported the following instances where 8C – Rolls-Royce 501-KIB7 Gas Turbine (EQT0014) was operated without water injection controls resulting in excess nitrogen oxides (NOx) emissions above the short-term permit limits:

<b>Date</b>	<b>Duration (hours)</b>
7/31/2009	8
11/9/2009	2
11/9/2009	0.75
1/9/2010	3.5
2/12/2010	1.33
4/12/2010	2.68
4/13/2010	1.27
4/21/2010	0.57
5/7/2010	0.58

Each failure is a violation of Title V Air Permit No. 0040-00025-V5, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

- B. The Respondent reported in the facility's 2011 2<sup>nd</sup> Semiannual Monitoring Report submitted to the Department on or about March 30, 2012, a failure to monitor pumps and pump and compressor seals for volatile organic carbon (VOC) by Method 21 quarterly for 16 – Fugitives (FUG0001). Specifically, the leak detection and repair (LDAR) contractor failed to monitor all pump and compressor seals for the 3<sup>rd</sup> quarter of 2011. Each monitoring failure is a violation of Title V Air Permit No. 0040-00025-V6 Specific Requirement 209, LAC 33:III.2121.C.2.b.i, LAC 33:III.501.C.4 and La. R.S. 30:2057(A)(2).
- C. The Respondent reported in the facility's 2011 2<sup>nd</sup> Semiannual Monitoring Report submitted to the Department on or about March 30, 2012, a failure to monitor valves for VOC by Method 21 quarterly for FUG0001. Specifically, the LDAR contractor failed to monitor all valves for the 3<sup>rd</sup> quarter of 2011. Each monitoring failure is a violation of Title V Air Permit No. 0040-00025-V6 Specific Requirement 210, LAC 33:III.2121.C.2.b.ii, LAC 33:III.501.C.4 and La. R.S. 30:2057(A)(2).
- D. The Respondent reported in the facility's 2011 2<sup>nd</sup> Semiannual Monitoring Report submitted to the Department on or about March 30, 2012, a failure

to monitor pressure relief valves for VOC by Method 21 quarterly for FUG0001. Specifically, the LDAR contractor failed to monitor all pressure relief valves in gas service for the 3<sup>rd</sup> quarter of 2011. Each monitoring failure is a violation of Title V Air Permit No. 0040-00025-V6 Specific Requirement 211, LAC 33:III.2121.C.2.b.iii, LAC 33:III.501.C.4 and La. R.S. 30:2057(A)(2).

- E. The Respondent reported in the facility's 2011 2<sup>nd</sup> Semiannual Monitoring Report submitted to the Department on or about March 30, 2012, and in the facility's 2012 Annual Compliance Certification submitted to the Department on or about March 28, 2013, a failure to monitor all components for VOC totals by Method 21 upon each occurrence of a leak detected by sight, smell or sound, unless electing to implement repair actions. Specifically, the Respondent failed to perform repairs of all VOC leaking components within fifteen (15) days or monitor by Method 21 from December 12, 2011, through April 26, 2012. Each failure is a violation of Title V Air Permit No. 0040-00025-V7 Specific Requirement 277, LAC 33:III.2121.C.3.b, LAC 33:III.501.C.4 and La. R.S. 30:2057(A)(2).
- F. The Respondent reported in the facility's 2011 Annual Compliance Certification submitted to the Department on or about March 30, 2012, failures to utilize weatherproof tags to identify leaking equipment at the facility from October 28, 2011, through December 31, 2011. Additionally, the Respondent reported failures to submit complete semiannual reports. Specifically, semiannual reports did not include updates to the list of affected sources in VOC service. Each failure occurring prior to November 10, 2011, is a violation of Title V Air Permit No. 0040-00025-V6 Specific Requirement 201, LAC 33:III.501.C.4 and La. R.S. 30:2057(A)(2). Each failure occurring after November 10, 2011, is a violation of Title V Air Permit No. 0040-00025-V7 Specific Requirement 264, LAC 33:III.501.C.4 and La. R.S. 30:2057(A)(2).
- G. The Respondent reported in the facility's 2011 Annual Compliance Certification submitted to the Department on or about March 30, 2012, and in the facility's 2012 Annual Compliance Certification submitted to the Department on or about March 28, 2013, a failure to make every reasonable effort to repair any regulated component observed leaking by sight, sound or smell regardless of the leak's concentration from December 12, 2011, through April 26, 2012. Each failure is a violation of Title V Air Permit No. 0040-00025-V7 Specific Requirement 268, LAC 33:III.2121.B.1, LAC 33:III.501.C.4 and La. R.S. 30:2057(A)(2).
- H. The Respondent reported in the facility's 2011 Annual Compliance Certification submitted to the Department on or about March 30, 2012, a failure to make every reasonable effort to repair a leaking component

within fifteen (15) days from December 12, 2011, through December 31, 2011. Each failure is a violation of Title V Air Permit No. 0040-00025-V7 Specific Requirement 270, LAC 33:III.2121.B.3, LAC 33:III.501.C.4 and La. R.S. 30:2057(A)(2).

- I. The Respondent reported in the facility's 2013 Annual Compliance Certification submitted to the Department on or about March 31, 2014, 2014 2<sup>nd</sup> Semiannual Monitoring Report submitted to the Department on or about March 31, 2015, and 2015 1<sup>st</sup> Semiannual Monitoring Report submitted to the Department on or about September 30, 2015, the following visible emissions events for 14 – Smokeless Flare (EQT0028) as identified by opacity observations greater than 20%:

<b>Date</b>	<b>Duration (minutes)</b>
11/7/2013	60
11/8/2013	30
11/9/2013	20
11/10/2013	20
11/11/2013	10
11/12/2013	15
11/13/2013	15
11/14/2013	30
11/26/2013	15
12/18/2013	60
8/7/2014	150
10/7/2014	30
11/11/2014	45
11/20-21/2014	125
11/21/2014	80
12/16/2014	10
12/30/2014	20
2/11/2015	10
6/1/2015	160

Each failure to operate with no visible emissions, except for periods not to exceed a total of five (5) minutes during any two (2) consecutive hours, occurring prior to February 14, 2014, is a violation of Title V Air Permit No. 0040-00025-V9 Specific Requirements 174 and 354, and each failure occurring after February 14, 2014, is a violation of Title V Air Permit No. 0040-00025-V10 Specific Requirements 171 and 373. Each event where opacity exceeds 20%, except for not more than one (1) six-minute period in any 60 consecutive minutes, occurring prior to February 14, 2014, is a

violation of Title V Air Permit No. 0040-00025-V9 Specific Requirement 205 and LAC 33:III.1311.C, and each event occurring after February 14, 2014, is a violation of Title V Air Permit No. 0040-00025-V10 Specific Requirement 202 and LAC 33:III.1311.C. Each event is also a violation of LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

- J. The Respondent reported in the facility's 2013 Annual Compliance Certification submitted to the Department on or about March 31, 2014, 2014 1<sup>st</sup> Semiannual Monitoring Report submitted to the Department on or about September 30, 2014, 2014 2<sup>nd</sup> Semiannual Monitoring Report submitted to the Department on or about March 31, 2015, and 2015 1<sup>st</sup> Semiannual Monitoring Report submitted to the Department on or about September 30, 2015, the following visible emissions events for 15 – Ground Flare (EQT0029) as identified by opacity observations greater than 20%:

<b>Date</b>	<b>Duration (minutes)</b>
10/30/2013	8
11/15/2013	60
11/27/2013	15
12/1/2013	7
12/2/2013	12
12/4/2013	35
12/8/2013	7
12/14/2013	30
12/17/2013	15
12/19/2013	240
12/26/2013	15
1/13/2014	10
2/11/2014	420
2/13/2014	360
2/14/2014	240
2/15/2014	240
2/16/2014	240
2/17/2014	120
2/19/2014	60
2/23/2014	120
2/28/2014	15
3/29/2014	45
4/1/2014	10
4/3/2014	10



<b>Date</b>	<b>Duration (minutes)</b>
4/7/2014	90
4/9/2014	20
4/10/2014	30
4/23/2014	90
4/24/2014	20
5/7/2014	180
5/8/2014	120
6/10/2014	15
6/16/2014	40
6/24/2014	10
6/29/2014	60
7/22/2014	30
7/27/2014	20
10/1/2014	10
10/14/2014	60
10/15/2014	10
11/14/2014	15
11/14/2014	30
11/14/2014	59
12/2/2014	6
12/22/2014	20
12/23/2014	15
12/23/2014	15
3/10/2015	25
3/11/2015	60
5/6/2015	20
5/20/2015	30

Each failure to operate with no visible emissions, except for periods not to exceed a total of five (5) minutes during any two (2) consecutive hours, occurring prior to February 14, 2014, is a violation of Title V Air Permit No. 0040-00025-V9 Specific Requirements 207 and 354, and each failure occurring after February 14, 2014, is a violation of Title V Air Permit No. 0040-00025-V10 Specific Requirements 204 and 373. Each event where opacity exceeds 20%, except for not more than one (1) six-minute period in any 60 consecutive minutes, occurring prior to February 14, 2014, is a violation of Title V Air Permit No. 0040-00025-V9 Specific Requirement 216 and LAC 33:III.1311.C, and each event occurring after February 14, 2014, is a violation of Title V Air Permit No. 0040-00025-V10 Specific

Requirement 213 and LAC 33:III.1311.C. Each event is also a violation of LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

- K. The Respondent reported in the facility's 2013 Annual Compliance Certification submitted to the Department on or about March 31, 2014, the following instances where the Respondent failed to operate 02-2 – Propane Emergency Relief System Flare (EQT0047) with opacity less than 20% for more than one (1) six-minute period in any 60 consecutive minutes:

<b>Date</b>	<b>Duration (minutes)</b>
11/2-3/2013	540
11/3/2013	10
11/5/2013	180
11/6/2013	120
12/3/2013	660
12/6/2013	242
12/27/2014	60
12/28/2014	10

Each instance is a violation of Title V Air Permit No. 0040-00025-V9 Specific Requirements 246 and 354, LAC 33:III.1311.C, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

- L. The Respondent reported in the facility's 2013 Annual Compliance Certification submitted to the Department on or about March 31, 2014, and in the facility's 2014 1<sup>st</sup> Semiannual Monitoring Report submitted to the Department on or about September 30, 2014, a failure to submit a timely notification of the actual date of initial startup for 12-1 Boiler B-101-G (EQT0061) postmarked within fifteen (15) days after such date. Specifically, the date of initial startup for EQT0061 was on or about November 25, 2013, but a notification was not postmarked until on or about June 27, 2014. This failure is a violation of Title V Air Permit No. 0040-00025-V9 Specific Requirements 288 and 354, Title V Air Permit No. 0040-00025-V10 Specific Requirements 285 and 373, LAC 33:III.501.C.4 and La. R.S. 30:2057(A)(2).
- M. The Respondent reported in the facility's 2014 2<sup>nd</sup> Semiannual Monitoring Report submitted to the Department on or about March 31, 2015, a visible emissions event for 17 – LOPA Ground Flare (EQT0030) as identified by an opacity observation greater than 20%. The event occurred for 40 minutes on November 24, 2014. The failure to operate with no visible emissions, except for periods not to exceed a total of five (5) minutes during any two (2) consecutive hours is a violation of Title V Air Permit

No. 0040-00025-V10 Specific Requirements 214 and 373. Each event where opacity exceeds 20%, except for not more than one (1) six-minute period in any 60 consecutive minutes, is a violation of Title V Air Permit No. 0040-00025-V10 Specific Requirement 223 and LAC 33:III.1311.C. The event is also a violation of LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

- N. On or about October 14, 2014, the Respondent submitted stack test reports to the Department for stack tests conducted on or about August 11, 2014, through August 12, 2014, for ENG01 – Compressor Engine 1 (EQT0057), ENG02 – Compressor Engine 2 (EQT0058) and ENG03 – Compressor Engine 3 (EQT0059) to demonstrate compliance with 40 CFR 60 Subpart JJJJ. A file review revealed that the Respondent failed to provide prior notifications and stack tests protocols to be used at least thirty (30) days before the tests were conducted. Each failure to submit prior notification is a violation of Title V Air Permit No. 0040-00025-V10 Specific Requirement 373, LAC 33:III.501.C.4 and La. R.S. 30:2057(A)(2).
  
- O. On or about July 28, 2015, the Respondent submitted written correspondence to the Department self-disclosing violations at the facility discovered during a routine facility inspection. Specifically, the facility replaced a short flare line associated with EQT0029 with a new process flare header during a 2013 plant expansion. The Respondent’s failure to submit a permit application and receive approval from the permitting authority prior to the construction, modification, and/or operation of a facility, which ultimately may have resulted in an initiation or increase in emission of air contaminants, is a violation of LAC 33:III.501.C.1, La. R.S. 30:2057(A)(1) and 30:2057(A)(2).
  
- P. On or about July 28, 2015, the Respondent submitted written correspondence to the Department self-disclosing violations at the facility discovered during a routine facility inspection. Specifically, the facility replaced a short flare line associated with EQT0029 with a new process flare header during a 2013 plant expansion. Operation of the flare without a permit after construction on or about November 4, 2013, is a violation of LAC 33:III.501.C.2, La. R.S. 30:2057(A)(1) and 30:2057(A)(2).”

On March 24, 2017, the Department issued to Respondent a Notice of Potential Penalty, Enforcement No. WE-PP-17-00073, which was based upon the following findings of fact:

The Respondent owns and/or operates a natural gas liquids fractionation plant located at 60995 Derrick Rd., Plaquemine, Iberville Parish, Louisiana. The Respondent was issued Louisiana Pollutant Discharge Elimination System (LPDES) Permit LA0126905 effective on

March 6, 2014, and was modified effective December 11, 2015, which will expire on February 28, 2019. Under the terms and conditions of LPDES Permit LA0126905, the Respondent is permitted to discharge process wastewater and other various wastewater streams into Bayou La Butte via an overflow weir and drainage ditch, all waters of the state.

On or about February 2, 2017, a file review conducted by the Department revealed the following violation(s):

The Respondent failed to comply with **COMPLIANCE ORDER WE-C-15-01004**. Specifically, the Respondent was ordered to comply with temporarily established interim effluent limits to allow continued discharge of cooling tower blowdown from a location not authorized by LPDES Permit LA0126905 until the permit could be modified for proper authorization. This outfall was designated as Outfall 103. During the monitoring period of October 2015, the Respondent failed collect samples for Outfall 103, and during the monitoring period of November 2015, the Respondent exceeded the Total Residual Chlorine Limit of 0.2 mg/L with a sample result of 0.94 mg/L. (COMPLIANCE ORDER WE-C-15-01004, La. R.S. 30:2076(A)(3), and LAC 33:IX.501.A)

The following violations, although not cited in the foregoing enforcement action(s), are included within the scope of this settlement:

**EnLink Processing Services, LLC - Blue Water Gas Plant - AI# 859**

The Respondent self-reported in the facility's 2011 2nd Semiannual Monitoring Report and 2012 1st Semiannual Monitoring Report, failures to monitor total VOCs by Method 21 upon each occurrence of a leak detected by sight, smell or sound unless electing to implement actions as specified in LAC 33:III.2121.C.3. Specifically, the Respondent did not always perform

repairs of all VOC-leaking components or monitor them by Method 21 from December 12, 2011, through April 26, 2012.

The Respondent self-reported in the facility's 2011 2nd Semiannual Monitoring Report a failure to monitor pumps and pump and compressor seals by Method 21 for total VOCs in the third quarter of 2011.

The Respondent self-reported in the facility's 2011 2nd Semiannual Monitoring Report a failure to monitor pressure relief valves in gas service by Method 21 for total VOCs in the third quarter of 2011.

**EnLink Processing Services, LLC - Eunice Gas Plant Loading Facility - AI# 32085**

On or about October 21, 2015, the facility experienced a release of approximately 186.6 pounds of butane due to operator error. The release was above the reportable quantity of 100 pounds for the pollutant. The duration of the release was approximately 30 seconds.

**EnLink Processing Services, LLC - Plaquemine NGL Fractionation Plant - AI# 184873**

The Respondent self-reported in the facility's 2013 Annual Compliance Certification a failure to submit a timely notification of the date of construction of an affected facility. Specifically, a notification was due on or about June 28, 2013, for UNF001/Entire Facility, but was not submitted until on or about December 10, 2013.

**EnLink Processing Services, LLC - Riverside Facility - AI# 3302**

The Respondent self-reported in the facility's 2015 1st Semiannual Monitoring Report an opacity exceedance for EQT0029 in violation of Specific Requirement 382 of Title V Air Permit No. 0180-00016-V11. Specifically, the flare motor experienced a malfunction resulting in an opacity exceedance from 13:00 on June 26, 2015, through 13:00 on June 27, 2015.

On or about September 26, 2013, the Respondent submitted a permit modification application to the Department. The application requested the addition of Emergency Fire Water Pump Engine No. 3 (EPN 3-13), which was an existing emission point but not included in the facility's permit. The application stated that the engine was constructed at the facility on or about May 31, 1996. The Respondent's failure to submit a permit application and receive approval from the permitting authority prior to the construction, modification, and/or operation of a facility, which ultimately may have resulted in an initiation or increase in emission of air contaminants, is a violation of LAC 33:III.501.C.1 and La. R.S. 30:2057(A)(2).

The Respondent operated EPN 3-13 at the facility without a permit. Specifically, the engine was operated at the facility unpermitted from the date of construction, May 31, 1996, until its inclusion as EQT0044 in Title V Air Permit No. 0180-00016-V10 on December 2, 2013. The operation of the engine without an air permit is a violation of LAC 33:III.501.C.2, La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

The Respondent self-reported in the facility's 2013 Annual Compliance Certification a failure to conduct timely measurements of the gap areas and maximum gap widths between the primary seal and the wall of the storage vessel during the hydrostatic testing of the vessel or within 60 days of the initial fill for EQT0039 in violation of Specific Requirement 409 of Title V Air Permit No. 0180-00016-V9. Specifically, the measurements were due by August 18, 2013, but were not conducted until November 22, 2013.

The Respondent self-reported in the facility's 2013 Annual Compliance Certification a failure to conduct timely measurements of the gap areas and maximum gap widths between the secondary seal and the wall of the storage vessel during the hydrostatic testing of the vessel or within 60 days of the initial fill for EQT0039 in violation of Specific Requirement 410 of Title V

Air Permit No. 0180-00016-V9. Specifically, the measurements were due by August 18, 2013, but were not conducted until November 22, 2013.

The Respondent self-reported in the facility's 2013 1st Semiannual Monitoring Report a failure to submit notification to the Department prior to installation of guide poles and stilling well systems for EQT0039 in violation of Specific Requirement 444 of Title V Air Permit No. 0180-00016-V9. Specifically, the notification was due prior to construction on or about April 22, 2013. Construction notification was submitted to the department on 7/2/13.

The Respondent self-reported in the facility's 2012 Annual Compliance Certification and 2011 Annual Compliance Certification a failure to monitor total VOCs by Method 21 upon each occurrence of a leak detected by sight, smell or sound unless electing to implement actions for FUG0001 in violation of Specific Requirement 419 of Title V Air Permit No. 0180-00016-V8. Specifically, the Respondent did not always perform Method 21 upon each occurrence of a leak from December 19, 2011, through April 26, 2012.

The Respondent self-reported in the facility's 2012 Annual Compliance Certification a failure to submit a notification of construction commencement within 30 days of the start of construction for UNF002 in violation of Specific Requirement 45 for Title V Air Permit No. 3096-V0. Specifically, the notification was due on or about December 26, 2012.

The Respondent self-reported in the facility's 2011 Annual Compliance Certification opacity exceedances for a combined total of 6 hours in any 10 consecutive day period for EQT029 in violation of Specific Requirement 385 for Title V Air Permit No. 0180-00016-V8. Specifically, opacity for burning in connection with pressure valve releases for control over process upsets exceeded a combined total of 6 hours from 12:00pm on November 30, 2011, through 3:00am on December 1, 2011.

The Respondent self-reported in the facility's 2011 Annual Compliance Certification failures to comply with the provisions of 40 CFR 60.486 and 60.487. Specifically, weatherproof tags were not utilized to identify leaking equipment, semiannual LDAR reports did not provide dates of process unit shutdowns and semiannual reports did not include updates to the list of affected sources in VOC service from October 28, 2011, through December 31, 2011.

The Respondent self-reported in the facility's 2011 Annual Compliance Certification failures to make first attempts to repair leaks no later than 5 calendar days and complete repairs no later than 15 calendar days for pressure relief devices in gas/vapor service. Specifically, personnel did not always perform repairs per regulatory timelines from December 19, 2011, through December 31, 2011.

The Respondent self-reported in the facility's 2011 Annual Compliance Certification failures to monitor total VOCs by Method 21 quarterly and within 5 days after each pressure release to detect leaks for pressure relief devices in gas/vapor service. Specifically, all pressure relief valves were not monitored in the 3rd quarter of 2011 and personnel did not perform Method 21 within 5 days after each pressure release.

The Respondent self-reported in the facility's 2011 Annual Compliance Certification failures to attach weatherproof and readily visible identification when each leak is detected for pressure relief devices in gas/vapor service. Specifically, weatherproof tags were not utilized from December 19, 2011, through December 31, 2011.

The Respondent self-reported in the facility's 2011 Annual Compliance Certification failures to repair any regulated component observed leaking by sight, sound or smell according to LAC 33:III.2122.C.3. Specifically, personnel did not always perform repairs per regulatory timelines from December 19, 2011, through December 31, 2011.



The Respondent self-reported in the facility's 2011 Annual Compliance Certification failures to monitor pumps and valves in heavy liquid service for total VOCs by Method 21 within 5 days if observed leaking by sight, sound or smell. Specifically, personnel did not always perform Method 21 within 5 days of observing a leak from December 19, 2011, through December 31, 2011.

The Respondent self-reported in the facility's 2011 Annual Compliance Certification failures to make every reasonable effort to repair leaking components. Specifically, personnel did not always perform repairs within 15 days from December 19, 2011, through December 31, 2011.

The Respondent self-reported in the facility's 2011 Annual Compliance Certification failures to monitor pumps and pump and compressor seals for total VOCs by Method 21 quarterly. Specifically, all pumps and pump/compressor seals were not monitored in the 3rd quarter of 2011.

The Respondent self-reported in the facility's 2011 Annual Compliance Certification failures to monitor valves for total VOCs by Method 21 quarterly. Specifically, all valves were not monitored in the 3rd quarter of 2011.

The Respondent self-reported in the facility's 2011 Annual Compliance Certification failures to monitor pressure relief valves in gas service for total VOCs by Method 21 quarterly. Specifically, all pressure relief valves were not monitored in the 3rd quarter of 2011.

The Respondent self-reported in the facility's 2011 Annual Compliance Certification failures to affix weatherproof and readily visible tags to a component which has a leak that cannot be repaired. Specifically, weatherproof tags were not utilized from December 19, 2011, through December 31, 2011.

**Sabine Pass Plant Facility Joint Venture - Sabine Pass Gas Plant - AI# 13079**

The Respondent self-reported in the facility's 2011 Title V 2nd Semiannual Monitoring Report submitted on or about March 30, 2012, failures to monitor pressure relief valves in gas service quarterly. Specifically, the Respondent failed to monitor the valves from July 1, 2011, through September 30, 2011. Each quarterly monitoring failure is a violation of Title V Air Permit No. 0560-00043-V5 Specific Requirement 51, LAC 33:III.2121.C.2.b.iii, LAC 33:III.501.C.4 and La. R.S. 30:2057(A)(2).

The Respondent self-reported in the facility's 2011 Title V 2nd Semiannual Monitoring Report submitted on or about March 30, 2012, and the facility's 2012 Title V 1st Semiannual Monitoring Report submitted on or about September 28, 2012, failures to monitor all components by 40 CFR 60, Appendix A, Method 21 upon each occurrence of a leak detected by sight, smell or sound, unless electing to implement actions as specified in LAC 33:III.2121.B.3. Specifically, the Respondent failed to perform repairs or monitor by Method 21 on VOC-leaking components from November 29, 2011, through April 26, 2012. Each failure is a violation of Title V Air Permit No. 0560-00043-V5 Specific Requirement 54, LAC 33:III.2121.C.3.b, LAC 33:III.501.C.4 and La. R.S. 30:2057(A)(2).

III

In response to the Consolidated Compliance Order & Notice of Potential Penalty, Respondent made a timely request for a hearing.

IV

Respondent denies it committed any violations or that it is liable for any fines, forfeitures and/or penalties.

V

Nonetheless, Respondent, without making any admission of liability under state or federal statute or regulation, agrees to pay, and the Department agrees to accept, a payment in the amount of TWO HUNDRED SEVENTY-FIVE THOUSAND AND NO/100 DOLLARS (\$275,000.00), of which Three Thousand Twenty-Eight and 86/100 Dollars (\$3,028.86) represents the Department's enforcement costs, in settlement of the claims set forth in this agreement. The total amount of money expended by Respondent on cash payments to the Department as described above, shall be considered a civil penalty for tax purposes, as required by La. R.S. 30:2050.7(E)(1).

VI

Respondent further agrees that the Department may consider the inspection report(s), permit record(s), the Consolidated Compliance Orders & Notices of Potential Penalty, Notices of Potential Penalty and this Settlement for the purpose of determining compliance history in connection with any future enforcement or permitting action by the Department against Respondent, and in any such action Respondent shall be estopped from objecting to the above-referenced documents being considered as proving the violations alleged herein for the sole purpose of determining Respondent's compliance history.

VII

This agreement shall be considered a final order of the Secretary for all purposes, including, but not limited to, enforcement under La. R.S. 30:2025(G)(2), and Respondent hereby waives any right to administrative or judicial review of the terms of this agreement, except such review as may be required for interpretation of this agreement in any action by the Department to enforce this agreement.

VIII

This settlement is being made in the interest of settling the state's claims and avoiding for both parties the expense and effort involved in litigation or an adjudicatory hearing. In agreeing to the compromise and settlement, the Department considered the factors for issuing civil penalties set forth in La. R. S. 30:2025(E) of the Act.

IX

As required by law, the Department has submitted this Settlement Agreement to the Louisiana Attorney General for approval or rejection. The Attorney General's concurrence is appended to this Settlement Agreement.

X

The Respondent has caused a public notice advertisement to be placed in the official journal of the parish governing authority in Acadia, Ascension, Cameron, Desoto, Evangeline, Iberville, Plaquemines, and Terrebonne parishes, Louisiana. The advertisement, in form and wording approved by the Department, announced the availability of this settlement for public view and comment and the opportunity for a public hearing. Respondent has submitted an original proof-of-publication affidavit and an original public notice to the Department and, as of the date this Settlement is executed on behalf of the Department, more than forty-five (45) days have elapsed since publication of the notice.

XI

Payment is to be made within ten (10) days from notice of the Secretary's signature. If payment is not received within that time, this Agreement is voidable at the option of the Department. Payments are to be made by check, payable to the Department of Environmental

Quality, and mailed or delivered to the attention of Accountant Administrator, Financial Services Division, Department of Environmental Quality, Post Office Box 4303, Baton Rouge, Louisiana, 70821-4303. Each payment shall be accompanied by a completed Settlement Payment Form (Exhibit A).

## XII

In consideration of the above, any claims for penalties are hereby compromised and settled in accordance with the terms of this Settlement.

## XIII

Each undersigned representative of the parties certifies that he or she is fully authorized to execute this Settlement Agreement on behalf of his or her respective party, and to legally bind such party to its terms and conditions.

ENLINK PROCESSING SERVICES, LLC  
SABINE PASS PLANT FACILITY JOINT  
VENTURE  
ENLINK LIG LIQUIDS, LLC  
ENLINK LOUISIANA GATHERING, LLC

BY: [Signature]  
(Signature)

Michael LeBlanc  
(Printed)


TITLE: SVP of Operations

THUS DONE AND SIGNED in duplicate original before me this 24th day of July, 2017, at Dallas TX.

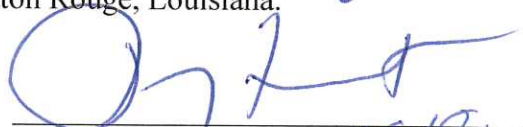
[Signature]  
NOTARY PUBLIC (ID # \_\_\_\_\_)



LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY  
Chuck Carr Brown, Ph.D., Secretary

BY:   
Lourdes Iturralde, Assistant Secretary  
Office of Environmental Compliance

THIS DONE AND SIGNED in duplicate original before me this 28<sup>th</sup> day of Aug, 2017, at Baton Rouge, Louisiana.

  
NOTARY PUBLIC (ID # 19181)

Approved:   
Lourdes Iturralde, Assistant Secretary

Perry Theriot  
(stamped or printed)