

STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:

TARGA MIDSTREAM SERVICES LLC

AI # 671, 17897, 32615

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

* Settlement Tracking No.
* SA-AE-21-0010
*
* Enforcement Tracking Nos.
* AE-CN-14-01078
* AE-CN-14-01078A
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SETTLEMENT

The following Settlement is hereby agreed to between Targa Midstream Services LLC (“Respondent”) 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”).

I

Respondent is a limited liability company that owns and/or operates facilities located in Calcasieu Parish and Plaquemines Parish, Louisiana (“the Facilities”).

II

On August 17, 2018, the Department issued to Respondent a Consolidated Compliance Order & Notice of Potential Penalty, Enforcement No. AE-CN-14-01078 (Exhibit 1).

On September 20, 2019, the Department issued to Respondent an Amended Consolidated Compliance Order & Notice of Potential Penalty, Enforcement No. AE-CN-14-01078A (Exhibit 2).

III

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

IV

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 FIFTY THOUSAND AND NO/100 DOLLARS (\$50,000.00), of which Seven Thousand One Hundred Seventy-Eight and 02/100 Dollars (\$7,178.02) 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).

V

Respondent further agrees that the Department may consider the inspection report(s), permit record(s), the Consolidated Compliance Order & Notice of Potential Penalty, Amended Consolidated Compliance Order & Notice 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.

VI

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.

VII

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.

VIII

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.

IX

The Respondent has caused a public notice advertisement to be placed in the official journal of the parish governing authority in Calcasieu Parish and Plaquemines Parish, 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.

X

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

TARGA MIDSTREAM SERVICES LLC

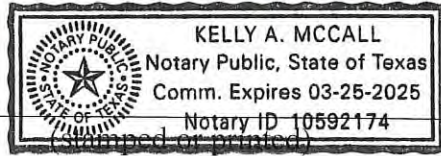
BY: Bill Grantham
(Signature)

Bill Grantham
(Printed)

TITLE: Vice President Operations

THUS DONE AND SIGNED in duplicate original before me this 21 day of APRIL, 20 21, at 2:59 PM.

Kelly A. McCall
NOTARY PUBLIC (ID # 10592174)

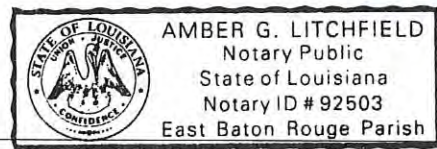


LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
Chuck Carr Brown, Ph.D., Secretary

BY: [Signature]
Lourdes Iturralde, Assistant Secretary
Office of Environmental Compliance

THUS DONE AND SIGNED in duplicate original before me this 10th day of August, 20 21, at Baton Rouge, Louisiana.

[Signature]
NOTARY PUBLIC (ID # 92503)



Approved: [Signature]
Lourdes Iturralde, Assistant Secretary

JOHN BEL EDWARDS
GOVERNOR



CHUCK CARR BROWN, Ph.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE

August 17, 2018

CERTIFIED MAIL (7005 1820 0002 2361 5054)
RETURN RECEIPT REQUESTED

TARGA MIDSTREAM SERVICES LLC
c/o C T Corporation System
Agent for Service of Process
3867 Plaza Tower Dr.
Baton Rouge, LA 70816

**RE: CONSOLIDATED COMPLIANCE ORDER
& NOTICE OF POTENTIAL PENALTY
ENFORCEMENT TRACKING NO. AE-CN-14-01078
AGENCY INTEREST NO. 671, 17897, 32615**

Dear Sir:

Pursuant to the Louisiana Environmental Quality Act (La. R.S. 30:2001, et seq.), the attached **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is hereby served on **TARGA MIDSTREAM SERVICES LLC (RESPONDENT)** for the violation(s) described therein.

Compliance is expected within the maximum time period established by each part of the **COMPLIANCE ORDER**. The violation(s) cited in the **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** could result in the issuance of a civil penalty or other appropriate legal actions.

Any questions concerning this action should be directed to Stacy Martinez at 225-219-3378 or via email at stacy.martinez@la.gov.

Sincerely,

Celena J. Cage
Administrator
Enforcement Division

CJC/SMM/smm
Alt ID No. 0520-00002, 2240-00015, 2240-00141
Attachment



c: Targa Midstream Services LLC
3807 Luke Powers Road
Lake Charles, LA 70615

Targa Midstream Services LLC
1565 Tidewater Road
Venice, LA 70091

**STATE OF LOUISIANA
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE**

<p>IN THE MATTER OF</p> <p>TARGA MIDSTREAM SERVICES LLC CALCASIEU & PLAQUEMINES PARISHES ALT ID NOS. 0520-00002, 2240-00015, 2240-00141</p> <p>PROCEEDINGS UNDER THE LOUISIANA ENVIRONMENTAL QUALITY ACT, La. R.S. 30:2001, ET SEQ.</p>	<p>*</p> <p>*</p> <p>*</p> <p>*</p> <p>*</p> <p>*</p> <p>*</p> <p>*</p> <p>*</p>	<p>ENFORCEMENT TRACKING NO.</p> <p style="text-align: center;">AE-CN-14-01078</p> <p>AGENCY INTEREST NOS.</p> <p style="text-align: center;">671, 17897, 32615</p>
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CONSOLIDATED
COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY

The following **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is issued to **TARGA MIDSTREAM SERVICES LLC (RESPONDENT)** by the Louisiana Department of Environmental Quality (the Department), under the authority granted by the Louisiana Environmental Quality Act (the Act), La. R.S. 30:2001, et seq., and particularly by La. R.S. 30:2025(C), 30:2050.2 and 30:2050.3(B).

FINDINGS OF FACT

I.

The Respondent owns and/or operates Gillis Gas Processing Plant (Agency Interest No. 671), a natural gas processing facility, located at 3807 Luke Powers Road in Lake Charles, Calcasieu Parish, Louisiana. The facility operates or has operated under the following Air Quality Permits:

PERMIT	ISSUE DATE
0520-00002-05	September 1, 2017
0520-00002-04	January 14, 2013
0520-00002-03AA	April 21, 2010

II.

On or about June 24, 2014, the Department performed an inspection and subsequent file review of the Respondent's facility was performed on March 28, 2018 to determine the degree of compliance with the Act and the Air Quality Regulations and all applicable permits for the time period of June 24, 2014 through September 1, 2017. While the Department's investigation is not yet complete, the following violations were noted during the course of the inspection and subsequent file review:

- A. The operating procedures were not annually certified. The failure to annually certify operating procedures were current and accurate is a violation of 40 CFR 68.69(c), which language has been adopted as a Louisiana regulation in LAC 33:III.5901.A and La. R.S. 30:2057(A)(2).
- B. The internal inspections for vessels A5652, A5655, A5653, and the demethanizer splitter tower were not conducted in accordance with good engineering practices, in that, the Respondent failed to perform any inspection. The failure to conduct inspections at a frequency consistent with good engineering practices 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 and La. R.S. 30:2057(A)(2).
- C. Management of changes (MOCs) for G-14/4/A and G-14/4/B were temporary, and no duration was established for how long the temporary changes would remain in effect. The failure to implement procedures for the MOC process to include a necessary time period for change is a violation of 40 CFR 68.75(b), which language has been adopted as a Louisiana regulation in LAC 33:III.5901.A and La. R.S. 30:2057(A)(2).
- D. In MOCs G-11/2/A, G-12/2/A, G-13/3/B, and G-14/3/A, employees affected by a change in the process were not trained prior to startup. The failure to train employees affected by a change in process prior to startup of the process is a violation of 40 CFR 68.75(c), which language has been adopted as a Louisiana regulation in LAC 33:III.5901.A and La. R.S. 30:2057(A)(2).
- E. The safety pre-qualifications for two (2) contractors were not documented. The failure to obtain and evaluate information regarding the contract owner or operator's safety performance and programs is a violation of 40 CFR 68.87(b)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.5901.A and La. R.S. 30:2057(A)(2).

- F. Two (2) contract employees were not required to watch a safety video, which covered the known potential hazards of the process for most contractors. The failure to inform contract operators of the known potential fire, explosion, or toxic release hazards related to the contractor's work and the process is a violation of 40 CFR 68.87(b)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.5901.A and La. R.S. 30:2057(A)(2).
- G. Two (2) contract employees were not required to watch a safety video, which covered the applicable provisions of the emergency response plan for most contractors. The failure to explain to each contract operator the applicable provisions of the emergency response plan is a violation of 40 CFR 68.87(b)(3), which language has been adopted as a Louisiana regulation in LAC 33:III.5901.A and La. R.S. 30:2057(A)(2).
- H. Documentation was not maintained on the frequency of refresher training for four (4) employees involved in the process. The failure to maintain documentation on the appropriate frequency of refresher training for employees involved in the process is a violation of 40 CFR 68.200, which language has been adopted as a Louisiana regulation in LAC 33:III.5901.A and La. R.S. 30:2057(A)(2).

III.

The Respondent owns and/or operates Venice Gas Processing Plant (Agency Interest No. 17897), a natural gas processing facility, located at the end of Tidewater Road in Venice, Plaquemines Parish, Louisiana. The facility operates or has operated under the following Title V Air Permits and Prevention of Significant Deterioration (PSD) Permit:

PERMIT	ISSUE DATE
2240-00015-V7	May 24, 2016
2240-00015-V6	March 13, 2014
2240-00015-V5	June 8, 2011
PSD-LA-612(M-1)	June 8, 2011

IV.

On or about August 26 through 27 2014, the Department performed an inspection and subsequent file review of the Respondent's facility was performed on March 28, 2018 to determine the degree of compliance with the Act and the Air Quality Regulations and all applicable permits for the time period of September 27, 2012 through September 1, 2017. While the Department's investigation is

not yet complete, the following violations were noted during the course of the inspection and subsequent file review:

- A. The consequences of deviations for the Cryogenic (Cryo) I unit were not included in the process safety information. The failure to include consequences of deviations in the process safety information is a violation of 40 CFR 68.65(c)(1)(v), which language has been adopted as a Louisiana regulation in LAC 33:III.5901.A and La. R.S. 30:2057(A)(2). In correspondence dated June 10, 2015, the Respondent reported that the Consequences of Deviations for Cryo I unit were completed.
- B. The Respondent failed to establish a system to promptly address the findings and recommendations of the process hazard analysis (PHA) is including a written schedule of what actions are to be taken, when actions are to be completed, and when actions were to be resolved. Additionally, some items were not being tracked, and there was no documentation that actions were resolved in a timely manner. The failure to develop a written schedule of what actions are to be taken to address PHA findings, when actions are to be completed, and document when actions were resolved is a violation of 40 CFR 68.67(e), which language has been adopted as a Louisiana regulation in LAC 33:III.5901.A and La. R.S. 30:2057(A)(2). In correspondence dated June 10, 2015, the Respondent addressed the area of concern by implementation of an online tracking system (Maximo) in order to track each action.
- C. The facility did not have enough thickness measurement locations (TMLs) established on the vessels for external ultrasonic testing. The failure to follow recognized and generally accepted good engineering practices for inspection and testing procedures for vessels is a violation of 40 CFR 68.73(d)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.5901.A and La. R.S. 30:2057(A)(2). In correspondence dated June 10, 2015, the Respondent stated that the number of points to be used while performing external ultrasonic testing inspections has increased.
- D. Written procedures were not established and implemented to maintain the on-going integrity of process equipment. There were no written procedures for the testing of vibration sensor (AHH-2322-7) and ESDs. The failure to establish and implement written procedures to maintain the on-going integrity of process equipment for testing is a violation of 40 CFR 68.73(b), which language has been adopted as a Louisiana regulation in LAC 33:III.5901.A and La. R.S. 30:2057(A)(2). The Respondent corrected the lack of testing procedures for AHH-2322-7 during the inspection.

- E. Records for ultrasonic thickness data on vessels V107 and D104 were not maintained for five (5) years. The failure to maintain records for ultrasonic thickness data for five (5) years is a violation of 40 CFR 68.200, which language has been adopted as a Louisiana regulation in LAC 33:III.5901.A and La. R.S. 30:2057(A)(2). In correspondence dated June 10, 2015, the Respondent reported the completion of ultrasonic thickness testing for both vessels in August 2014. The Respondent also entered and scheduled recurring five (5) year ultrasonic thickness testing in the Maximo tracking system.
- F. The facility had completed compliance audits with recommendations; however, the responsibilities were not assigned or progress tracked to ensure deficiencies had been corrected. The failure to document a response to each of the findings of the compliance audit and to document deficiencies is a violation of 40 CFR 68.79(d), which language has been adopted as a Louisiana regulation in LAC 33:III.5901.A and La. R.S. 30:2057(A)(2). In correspondence dated June 10, 2015, the Respondent reported that the actions were loaded into the Maximo system for tracking and created a regional ES&H management position to ensure the management systems are implemented and maintained.
- G. According to the 2012 First Title V Semiannual Report dated September 27, 2012, the Respondent reported that the 2012 Excess Emissions Semiannual Monitoring Report dated July 30, 2012 was postmarked August 2, 2012, three (3) days after the due date of July 30, 2012. This is a violation of Specific Requirement of 75 of Title V Permit No. 2240-00015-V5, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).
- H. According to the 2012 First Title V Semiannual Monitoring Report dated September 27, 2012, the Respondent reported that monitoring data was lost for EQT 0046. According to the Respondent, the incident took place on June 26, 2012, and the duration was forty-five (45) minutes. The failure to monitor the ratio by continuous monitoring system (CMS) continuously is a violation of Specific Requirement No. 71 of Title V Permit No. 2240-00015-V5, 40 CFR 60.4335 (a), which language has been adopted as a Louisiana regulation in LAC 33:III.3003, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).
- I. According to the 2013 First Semiannual Monitoring Report dated September 30, 2013, the Respondent reported the loss of stream injection for NOx control on EQT 0041 (GE Frame 5 Turbine) due to a boiler shutdown. According to the Respondent, the incident took place on April 25, 2013, and the duration was one (1) hour. This is a

violation of Specific Condition No. 3 of PSD-LA-612 (M-1), Specific Requirement No. 54 of Title V Permit No. 2240-00015-V5, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).

- J. According to the 2013 First Semiannual Monitoring Report dated September 30, 2013, the Respondent reported the loss of stream injection for NO_x control on EQT 0041(GE Frame 5 Turbine) during the switching of generator power. According to the Respondent, the incident took place on June 6, 2013, and the duration was 1.33 hours. This is a violation of Specific Condition No. 3 of PSD-LA-612 (M-1), Specific Requirement No. 54 of Title V Permit No. 2240-00015-V5, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).
- K. According to the 2014 First Semiannual Monitoring Report dated September 29, 2014, the Respondent reported the Cryo II turbine (EQT 0046) shut down due to a malfunction of the burner safety 'fire eye' causing flaring. This resulted in an opacity exceedance associated with the facility's process flare (EQT 0009). According to the Respondent, this incident occurred on March 9, 2014, and the duration was fifteen (15) minutes. Visible emissions which exceed a total of five (5) minutes during any two (2) consecutive hours is a violation of 40 CFR 60.18(c)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.3003, Specific Requirement No. 1 of Title V Permit No. 2240-00015-V5, LAC 33:III.504.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).
- L. According to the 2014 Second Title V Semiannual Monitoring Report dated March 24, 2015, the Respondent reported the loss of monitoring data by the CMS for the water/fuel ratio due to a computer shutdown on dates in the following table:

	EMISSION SOURCE	DATE	DURATION	CORRECTIVE ACTION(S)
1	EQT 0046	August 6, 2014	4 hours	Computer rebooted and data began tracking
2	EQT 0046	December 4-5, 2014	25 hours	Computer rebooted and data began tracking
3	EQT 0046	December 8-9, 2014	5 minutes	Computer rebooted and data began tracking

Each failure to monitor the water/fuel ratio by the CMS continuously is a violation of Specific Requirement No. 115 of Title V Permit No. 2240-00015-V6, 40 CFR 60.4335(a), which language has been

adopted as a Louisiana regulation in LAC 33.III.3003, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

- M. The Respondent reported operating the following emission points prior to submitting a permit application or issuance of a permit.

	REPORT (DATE OF REPORT)	DATE RANGE	EQUIPMENT	REGULATION	CORRECTIVE ACTION(S)
1	2014 Second Semiannual Monitoring Report (3.24.14)	January 1- December 31, 2014	The deutz stand-by storm water pump (66 HP) engine was not authorized on the permit	LAC 33.III.501.C.1 & LAC 33.III.501.C.2	Permit application submitted on December 8, 2015; added as EQT 48 in permit 2240-00015-V7
2	2014 Second Semiannual Monitoring Report (3.24.15)	January 1- December 31, 2014	The Co-Gen starter (225 HP Cat engine 3208) was not authorized to operate. The starter only operates at startup for a short period of time	LAC 33.III.501.C.1 & LAC 33.III.501.C.2	Permit application submitted on December 8, 2015; added as EQT 47 in permit 2240-00015-V7
3	2014 Second Semiannual Monitoring Report (3.24.14)	January 1- December 31, 2014	A 1,000 gallon diesel storage tank	LAC 33.III.501.B.5	Application submitted on December 8, 2015; added as Insignificant Activity in permit 2240-00015-V7
4	2014 Second Semiannual Monitoring Report (3.24.14)	January 1- December 31, 2014	A 300 gallon diesel storage tank	LAC 33.III.501.B.5	Application submitted on December 8, 2015; added as Insignificant Activity in permit 2240-00015-V7

Each failure to submit a permit application to the Office of Environmental Services and receive approval from the permitting authority prior to construction, modification, or operation of a facility which may result in the emission of air contaminants is a violation of LAC 33:III.501.C.1, LAC 33:III.501.C.2, and La. R.S. 30:2057(A)(2). The failure to request approval from the Department prior to operating those sources listed as insignificant activities is a violation of LAC 33:III.501.B.5 and La. R.S. 30:2057(A)(2).

- N. According to the 2015 Title V Second Semiannual Report dated March 28, 2016, the excess flare emissions were not reported for EQT 009 (Process Flare) in the Annual Compliance Certifications for 2012, 2013, and 2014. This is a violation of Specific Requirement No. 165 of Title V Permit No. 2240-00015-V6, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).
- O. According to the 2015 Title V Second Semiannual Report dated March 28, 2016, improperly seated flare control valves and higher than estimated closed-drain sump vapor emissions caused the flare emissions to exceed the emissions limit for EQT 009 (Process Flare).

According to the Respondent, the leaking flare control valves started on January 1, 2015 and were addressed by June 28, 2015. This is a violation of Title V Permit No. 2240-00015-V6, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). In Title V Permit No. 2240-00015-V6, the permit limits for EQT 009 were 1.34 tons/year for carbon monoxide (CO), 0.51 tons/year for volatile organic compound (VOC), and 0.25 tons/year for NO_x. In Title V Permit No. 2240-00015-V7, the permit limits for EQT 0009 were increased to 2.91 tons/year for CO, 5.35 tons/year for VOC, and 0.64 tons/year for NO_x.

- P. Based on the September 29-30, 2011 stack test, the water injection ratio (WIR) was established as 0.82 to meet the NO_x requirement of ≤ 25 ppm @ 15% O₂ as set forth in 40 CFR 60.4320(a). The following are the reported causes of deviation for operating outside of the of the NO_x requirement of ≤ 25 ppm @ 15% O₂:

	REPORT (Date)	PERMIT NUMBER (Specific Requirement number)	EMISSION POINT	DATE INCIDENT BEGAN (Duration)	OPERATING PARAMETER	CAUSE OF DEVIATION	CORRECTIVE ACTION
1	2012 First Semiannual Monitoring Report (9.27.2012) & 2012 Semiannual Excess Emissions Report (7.30.2012)	2240-0015- V5 (66)	EQT 0046 (Cryo 2 2500 Turbine)	5.4.2012 (1 hour) 5.8.2012 (2 hours) 5.9.2012 (2 hours) 5.10.2012 (6 hours) 5.12.2012 (3 hours) 5.13.2012 (6 hours)	NO _x ≤ 25 ppm @ 15% O ₂	WIR below 0.82	The water value follows the fuel meter signal, and there is some swing in the injection rate. The process set point was raised from: 0.83 to 0.84 to allow for process variability
2	2012 First Semiannual Monitoring Report (9.27.2012) & 2012 Semiannual Excess Emissions Report (7.30.2012)	2240-0015- V5 (66)	EQT 0046 (Cryo 2 2500 Turbine)	6.14.2012 (13 hours) 6.15.2012 (9 hours) 6.16.2012 (8 hours) 6.17.2012 (2 hours) 6.19.2012 (1 hour)	NO _x ≤ 25 ppm @ 15% O ₂	WIR below 0.82	The process set point has been raised from 0.83 to 0.84 to allow for process variability

	REPORT (Date)	PERMIT NUMBER (Specific Requirement number)	EMISSION POINT	DATE INCIDENT BEGAN (Duration)	OPERATING PARAMETER	CAUSE OF DEVIATION	CORRECTIVE ACTION
3	2012 First Semiannual Monitoring Report (9.27.2012) & 2012 Semiannual Excess Emissions Report (7.30.2012)	2240-0015- V5 (66)	EQT 0046 (Cryo 2/ 2500 Turbine)	6.26.2012 (45 minutes)	NOx ≤ 25 ppm @ 15% O ₂	Data Loss Water Injection	The process set point has been raised from 0.83 to 0.84 to allow for process variability
4	2014 First Semiannual Monitoring Report (9.29.14)	2240-0015- V5 (66)	EQT 0046 (Cryo 2/ LM 2500)	1.8.2014 (20 minutes)	NOx ≤ 25 ppm @ 15% O ₂	Startup emissions: Water injection not online during warmup procedure	Water injection started as soon as it was safe to do so without the risk of a flameout in the turbine
5	2014 First Semiannual Monitoring Report (9.29.14)	2240-0015- V5 (66)	EQT 0046 (Cryo 2/ LM 2500)	3.11.14 (25 minutes)	NOx ≤ 25 ppm @ 15% O ₂	Startup emissions associated with placing turbine into warmup mode following repairs: water injection is not online during the warmup procedure	Water injection started as soon as it was safe to do so without the risk of a flameout in the turbine
6	2014 First Semiannual Monitoring Report (9.29.14)	2240-0015- V6 (111)	EQT 0046 (Cryo 2/ LM 2500)	6.6.2014 (3 hours, 25 minutes)	NOx ≤ 25 ppm @ 15% O ₂	Shut down for maintenance to water wash and change safety on oil pump; water injection not online during the warmup procedure	Turbine brought back online after repairs were made
7	2015 First Semiannual Monitoring Report (9.29.2015)	2240-00015- V6 (111)	EQT 0046 (Cryo 2/ LM 2500)	3.1.2015 (3 hours, 45 minutes)	NOx ≤ 25 ppm @ 15% O ₂	Shut down of turbine to repair a reflux valve; WIR below required 4 hour average; During startup shutdown sequence water injection delayed briefly	Startup and shutdown performed to safely bring the turbine and water injection back on line as quickly as possible
8	2015 First Semiannual Monitoring Report (9.29.2015)	2240-00015- V6 (111)	EQT 0046 (Cryo 2/ LM 2500)	3.6.2015 (6 hours, 40 minutes)	NOx ≤ 25 ppm @ 15% O ₂	Shutting down of turbine to repair faulty pressure switch; WIR below required 4 hour average; During startup shutdown sequence water injection delayed briefly	Startup and shutdown performed to safely bring the turbine and water injection back on line as quickly as possible
9	2015 First Semiannual Monitoring Report (9.29.2015)	2240-00015- V6 (111)	EQT 0046 (Cryo 2/ LM 2500)	6.1.2015 (7 hours, 15 minutes)	NOx ≤ 25 ppm @ 15% O ₂	Shutting down of turbine to repair faulty pressure switch; WIR below required 4 hour average; During startup shutdown sequence water injection delayed briefly	Startup and shutdown performed to safely bring the turbine and water injection back on line as quickly as possible

	REPORT (Date)	PERMIT NUMBER (Specific Requirement number)	EMISSION POINT	DATE INCIDENT BEGAN (Duration)	OPERATING PARAMETER	CAUSE OF DEVIATION	CORRECTIVE ACTION
10	2015 Second Semiannual Monitoring Report (3.28.2016)	2240-00015- V6 (111)	EQT 0046 (Cryo 2/ LM2500)	7.28.2015 (50 minutes)	NO _x ≤ 25 ppm @ 15% O ₂	Water injection pump went down WIR below required 4 hour average: During startup shutdown sequence water injection delayed briefly	Startup and shutdown performed to safely bring the turbine and water injection back on line as quickly as possible
11	2015 Second Semiannual Monitoring Report (3.28.2016)	2240-00015- V6 (111)	EQT 0046 (Cryo 2/ LM2500)	9.2.2015 (10 hours)	NO _x ≤ 25 ppm @ 15% O ₂	Shutting down of turbine for vibration checks: WIR below required 4 hour average: During startup shutdown sequence water injection delayed briefly	Startup and shutdown performed to safely bring the turbine and water injection back on line as quickly as possible
12	2015 Second Semiannual Monitoring Report (3.28.2016)	2240-00015- V6 (111)	EQT 0046 (Cryo 2/ LM2500)	9.2.2015 (34 hours, 40 minutes)	NO _x ≤ 25 ppm @ 15% O ₂	Shut down for vibration checks on equipment: WIR below required 4 hour average: During startup shutdown sequence water injection delayed briefly	Startup and shutdown performed to safely bring the turbine and water injection back on line as quickly as possible
13	2015 Second Semiannual Monitoring Report (3.28.2016)	2240-00015- V6 (111)	EQT 0046 (Cryo 2/ LM2500)	12.8.2015 (3 hours, 15 minutes)	NO _x ≤ 25 ppm @ 15% O ₂	Shut down due to generator tripping off line: WIR below required 4 hour average: During startup shutdown sequence water injection delayed briefly	Startup and shutdown performed to safely bring the turbine and water injection back on line as quickly as possible
14	2016 First Semiannual Monitoring Report (9.26.2016)	2240-00015- V6 (111)	EQT 0046 (Cryo 2/ LM2500)	2.14.2016 (1 hour, 40 minutes)	NO _x ≤ 25 ppm @ 15% O ₂	Shut down due to generator tripping off line: WIR below required 4 hour average: During startup shutdown sequence water injection delayed briefly	Startup and shutdown performed to safely bring the turbine and water injection back on line as quickly as possible
15	2016 First Semiannual Monitoring Report (9.26.2016)	2240-00015- V6 (111)	EQT 0046 (Cryo 2/ LM2500)	2.17.2016 (25 minutes)	NO _x ≤ 25 ppm @ 15% O ₂	Shut down for repair of dehydrator regen valve: WIR below required 4 hour average: During startup shutdown sequence water injection delayed briefly	Startup and shutdown performed to safely bring the turbine and water injection back on line as quickly as possible
16	2016 First Semiannual Monitoring Report (9.26.2016)	2240-00015- V6 (111)	EQT 0046 (Cryo 2/ LM2500)	2.18.2016 (1 hour, 15 minutes)	NO _x ≤ 25 ppm @ 15% O ₂	Shut down for repair of dehydrator regen valve: WIR below required 4 hour average: During startup shutdown sequence water injection delayed briefly	Startup and shutdown performed to safely bring the turbine and water injection back on line as quickly as possible

	REPORT (Date)	PERMIT NUMBER (Specific Requirement number)	EMISSION POINT	DATE INCIDENT BEGAN (Duration)	OPERATING PARAMETER	CAUSE OF DEVIATION	CORRECTIVE ACTION
17	2016 First Semiannual Monitoring Report (9.26.2016)	2240-00015- V6 (111)	EQT 0046 (Cryo 2/ LM2500)	2.19.2016 (50 minutes)	NO _x ≤ 25 ppm @ 15% O ₂	Shut down for replacement of dehydrator regen valve: WIR below required 4 hour average: During startup shutdown sequence water injection delayed briefly	Startup and shutdown performed to safely bring the turbine and water injection back on line as quickly as possible
18	2016 First Semiannual Monitoring Report (9.26.2016)	2240-00015- V6 (111)	EQT 0046 (Cryo 2/ LM2500)	3.11.2016 (20 minutes)	NO _x ≤ 25 ppm @ 15% O ₂	Water injection pump went down: WIR below required 4 hour average: During startup shutdown sequence water injection delayed briefly	Startup and shutdown performed to safely bring the turbine and water injection back on line as quickly as possible
19	2016 First Semiannual Monitoring Report (9.26.2016)	2240-00015- V7 (60)	EQT 0046 (Cryo 2/ LM2500)	6.21.2016 (10 minutes)	NO _x ≤ 25 ppm @ 15% O ₂	Water injection pump went down: WIR below required 4 hour average: During startup shutdown sequence water injection delayed briefly	Startup and shutdown performed to safely bring the turbine and water injection back on line as quickly as possible
20	2016 First Semiannual Monitoring Report (9.26.2016)	2240-00015- V7 (60)	EQT 0046 (Cryo 2/ LM2500)	6.21.2016 (40 minutes)	NO _x ≤ 25 ppm @ 15% O ₂	Shut down for maintenance water wash and borescope inspection of combustion section and safety checks: Water injection pump went down: WIR below required 4 hour average: During startup shutdown sequence water injection delayed briefly	Startup and shutdown performed to safely bring the turbine and water injection back on line as quickly as possible
21	2016 First Semiannual Monitoring Report (9.26.2016)	2240-00015- V7 (60)	EQT 0046 (Cryo 2/ LM2500)	6.22.2016 (25 minutes)	NO _x ≤ 25 ppm @ 15% O ₂	Shut down for maintenance water wash and borescope inspection of combustion section and safety checks: Water injection pump went down: WIR below required 4 hour average: During startup shutdown sequence water injection delayed briefly	Startup and shutdown performed to safely bring the turbine and water injection back on line as quickly as possible

Each failure to operate according to permitted requirements is a violation of any applicable permit and associated requirement(s) listed above, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).

V.

According to the 2015 Title V Second Semiannual Report dated March 28, 2016, the Respondent reported an exceedance of permitted hours for EQT 0020 (Plant Fire Water Pump) from July 1, 2015 through December 31, 2015 due to using the backup firewater pump as a water feed pump. The Respondent reported the total number of hours as 4,380 hours, and the operating time listed in Title V Permit No. 2240-00015-V6 was twenty-six (26) hours per year (hrs/yr) for EQT 0020. On December 8, 2015, the Respondent submitted a permit renewal application to increase the operating time. The Department issued Title V Permit No. 2240-00015-V7 on May 24, 2016, and the operating time increased to 500 hrs/yr for EQT 0020.

VI.

According to the 2015 Title V Second Semiannual Report dated March 28, 2016, the Respondent reported that the excess run-time hours for EQT 0020 from January 1, 2015 through June 30, 2015 were omitted on the 2015 Title V First Semiannual Report. The Respondent reported that a staff turnover was the cause of the omission.

VII.

The Respondent owns and/or operates the Delta Gathering Station (Agency Interest No. 32615), an oil and gas processing facility, located at 1565 Tidewater Road in Venice, Plaquemines Parish, Louisiana. The facility operates or has operated under the authority of the following Title V Air Permits:

PERMIT	ISSUE DATE
2240-00141-V9	August 14, 2015
2240-00141-V8	July 9, 2015
2240-00141-V7	October 18, 2013
2240-00141-V6	July 3, 2012
2240-00141-V5	October 25, 2011
2240-00141-V4	August 8, 2010

VIII.

On or about June 4, 2013, the Department performed an inspection and subsequent file review of the Respondent's facility was performed on March 28, 2018 to determine the degree of compliance with the Act and the Air Quality Regulations and all applicable permits for the time period of September 28,

2011 through September 1, 2017. While the Department's investigation is not yet complete, the following violations were noted during the course of the inspection and subsequent file review:

- A. On or about February 16, 2012, the Respondent submitted a compliance test report for Centaur Turbine Compressor Engine No. 10 (EQT 011) to the Department. The test was conducted on December 19 and 20, 2011, and the results are listed below.

EQT 011	Average Test Run Results (lb/hr)	Maximum Permit Limit (lb/hr)
NO _x	12.86	12.03

The exceedance of the maximum pound per hour permitted emission limit is a violation of Title V Permit No. 2240-00141-V5, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). On March 28, 2012, a Temporary Variance was issued to the facility allowing an increase of emissions of NO_x to 16.25 maximum pounds per hour (max lb/hr). The variance expired on July 3, 2012 when Title V Permit No. 2240-00141-V6 was issued. The permit included NO_x emission limits of 20.31 max lb/hr for EQT 011.

- B. The following Title V reports were postmarked after the due date:

	REPORT	PERMIT NUMBER	DUE DATE	POSTMARK DATE	DAY(S) LATE
1	2012 Title V Second Semiannual Monitoring Report	2240-00141-V6	March 31, 2013	April 2, 2013	2
2	2012 Title V Annual Monitoring Report	2240-00141-V6	March 31, 2013	April 2, 2013	2

The failure to submit Title V reports to the Department by the due date is a violation of Title V Permit No. 2240-00141-V6, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).

- C. According to the 2012 Second Semiannual Report dated April 1, 2013, an emissions test was conducted for EQT Nos. 0006, 0007, 0009, and 0010 of CRG0002 on January 3, 2013. The test was conducted four (4) days after the due date of December 30, 2012. The failure to conduct the performance/emissions test is a violation of Specific Requirement 9 of Title V Permit No. 2240-00141-V6, LAC 33:III.501.C.4, LAC 33:III.507.H.1.a, and La. R.S. 30:2057(A)(2). The compliance test report for EQT Nos. 0006, 0007, 0009, and 0010 was received by the Department on February 7, 2013.

D. The Respondent conducted a stack test on August 9, 2013 for EQT 0041 (Vapor Recovery System Compressor), and the initial engine tested at 0.83 grams per horsepower hour (g/hp-hr) for VOCs. On November 27, 2013, the Department deemed the procedures and calculations to be acceptable for VOCs because the result was below the standard of one (1) g/hp-hr for engines manufactured before January 1, 2011. According to the 2013 Second Semiannual Monitoring Report dated March 28, 2014, the Respondent reported EQT 0041 was discovered to be manufactured after January 1, 2011, which has the requirement of 0.70 g/hp-hr for VOCs. Therefore, EQT 0041 was out of compliance because the initial engine tested at 0.83 g/hp-hr. An additional catalyst was installed, and the engine retested below the limit at 0.52 g/hp-hr on November 25, 2013. A variance was issued on April 18, 2013 due to the current vapor recovery system (VRS) backup compressor breaking down and needing major repairs. An additional variance was issued on July 31, 2013. The exceedance of the hourly VOC emission limit is a violation of 40 CFR 60.4233(e) which language has been adopted as a Louisiana regulation in LAC 33:III.3003, La. R.S. 30:2057(A)(1) and 30:2057(A)(2). EQT 0041 was permitted for 1.0 g/hp-hr in Specific Requirement 82 of Title V Permit No. 2240-00141-V7 and Specific Requirement 79 of Title V Permit No. 2240-00141-V8, but 0.70 g/hp-hr was incorporated in Specific Requirement 81 of Title V Permit No. 2240-00141-V9.

E. The following report was postmarked past the due date:

REPORT (Date)	REPORTING PERIOD	EQUIPMENT	PERMIT NUMBER (Specific Requirement)	REPORTING REQUIREMENT	2014-2015 NSPS OOOO ANNUAL REPORT INITIAL POSTMARK DATE	DUE DATE	SUBMITTAL DATE	DAYS LATE
2015-2016 NSPS OOOO Annual Report (February 6, 2017)	10.13.15-10.14.16	EQT 0041 Vapor Recovery Compressor-Cat3306A	2240-00141-V9 (94)	Annual reports are due no later than the same date each year as the initial annual report	January 11, 2016	January 11, 2017	February 7, 2017	27 Days

The failure to submit the aforementioned report by the due date to the Department is a violation of the applicable permit and associated requirement listed above, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).

F. According to the 2016 Second Semiannual Monitoring Report dated March 29, 2017, the Respondent did not perform maintenance from January 1, 2016 through September 28, 2016 on Cooling Water Pump Engine No. 2 (EQT 0014) and from January 1, 2016 through April 24, 2016 for Cooling Water Pump Engine No. 3 (EQT 0015) due to an

error in the tracking system. This is a violation of Specific Requirement 4 of Title V Permit No. 2240-00141-V9, 40 CFR 63.6603(a), which language has been adopted as a Louisiana regulation in LAC 33:III.5122, LAC 33:III.501.C.4, and La. R.S.30:2057(A)(2). The Respondent reported that maintenance was performed upon discovery and tracking system errors were corrected.

COMPLIANCE ORDER

Based on the foregoing, the Respondent is **hereby ordered**:

I.

To take, immediately upon receipt of this **COMPLIANCE ORDER**, any and all steps necessary to meet and maintain compliance with the Air Quality Regulations and applicable permits.

II.

To submit, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, documentation assuring that the certifying procedures were annually certified for the past five (5) years from the action effective date as described in Paragraph II.A of the **FINDINGS OF FACT** portion of this **COMPLIANCE ORDER**.

III.

To submit, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, documentation that shows how RBIs of vessels A5652, A5655, A5653, and the demethanizer splitter tower follow good engineering practices consistent with API 580 and/or API 581 or an inspection plan consistent with API 510 for the internal inspections of the aforementioned vessels and tower as described in Paragraph II.B of the **FINDINGS OF FACT** portion of this **COMPLIANCE ORDER**.

IV.

Upon receipt of this **COMPLIANCE ORDER**, develop procedures for maintaining documentation on how long temporary changes for MOCs would remain in effect as described in Paragraph II.C of the **FINDINGS OF FACT** portion of this **COMPLIANCE ORDER**. The Respondent shall maintain and provide documentation upon request by the Department.

V.

Upon receipt of this **COMPLIANCE ORDER**, develop procedures for maintaining documentation that employees were trained in MOCs, contractors completed safety pre-qualifications, contractors were trained on the known potential hazards of the process, contractors were trained on

applicable provisions of the emergency response plan, and employees were consulted on the frequency of refresher training as described Paragraphs II.D, II.E, II.F, II.G, and II.H of the **FINDINGS OF FACT** portion of this **COMPLIANCE ORDER**. The Respondent shall maintain and provide documentation upon request by the Department.

VI.

To submit, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, a written report describing how records are kept for the ultrasonic thickness data on vessels V107 and D104 as referenced in Paragraph IV.E of the **FINDINGS OF FACT** portion of this **COMPLIANCE ORDER**.

VII.

To submit, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, a written report as described in Paragraph IV.N and IV.O of the **FINDINGS OF FACT** portion of this **COMPLIANCE ORDER**. The report shall include the type and amount of emissions for EQT 009 (Process Flare), permit limit(s), and amount above permit limit(s), if applicable, from January 1, 2013 if available through June 28, 2015.

VIII.

To submit, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, a written report for EQT 0020 as described in for Paragraph V of the **FINDINGS OF FACT** portion of this **COMPLIANCE ORDER** that includes the type and amount of emissions, permit limit(s), and amount above permit limit(s), if applicable, from July 1, 2015 through December 31, 2015.

IX.

To submit, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, a written report for EQT 0020 as described in for Paragraph VI of the **FINDINGS OF FACT** portion of this **COMPLIANCE ORDER** that includes the run time hours, type and amount of emissions, permit limit(s), and amount above permit limit(s), if applicable, for the period of January 1, 2015 through June 30, 2015.

X.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, a written report that includes a detailed description of the circumstances surrounding the cited violation(s) and actions taken or to be taken to achieve compliance with the Order Portion of this **COMPLIANCE ORDER**. This report and all other reports or information required to be submitted to the Enforcement Division by this **COMPLIANCE ORDER** shall be submitted to:

Office of Environmental Compliance
Post Office Box 4312
Baton Rouge, Louisiana 70821-4312
Attn: Stacy Martinez
Re: Enforcement Tracking No. AE-CN-14-01078
Agency Interest No. 671, 17897, 32615

THE RESPONDENT SHALL FURTHER BE ON NOTICE THAT:

I.

The Respondent has a right to an adjudicatory hearing on a disputed issue of material fact or of law arising from this **COMPLIANCE ORDER**. This right may be exercised by filing a written request with the Secretary no later than thirty (30) days after receipt of this **COMPLIANCE ORDER**.

II.

The request for an adjudicatory hearing shall specify the provisions of the **COMPLIANCE ORDER** on which the hearing is requested and shall briefly describe the basis for the request. This request should reference the Enforcement Tracking Number and Agency Interest Number, which are located in the upper right-hand corner of the first page of this document and should be directed to the following:

Department of Environmental Quality
Office of the Secretary
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302
Attn: Hearings Clerk, Legal Division
Re: Enforcement Tracking No. AE-CN-14-01078
Agency Interest No. 671, 17897, 32615

III.

Upon the Respondent's timely filing a request for a hearing, a hearing on the disputed issue of material fact or of law regarding this **COMPLIANCE ORDER** may be scheduled by the Secretary of the Department. The hearing shall be governed by the Act, the Administrative Procedure Act (La. R.S. 49:950, et seq.), and the Department's Rules of Procedure. The Department may amend or supplement this **COMPLIANCE ORDER** prior to the hearing, after providing sufficient notice and an opportunity for the preparation of a defense for the hearing.

IV.

This **COMPLIANCE ORDER** shall become a final enforcement action unless the request for hearing is timely filed. Failure to timely request a hearing constitutes a waiver of the Respondent's right

to a hearing on a disputed issue of material fact or of law under Section 2050.4 of the Act for the violation(s) described herein.

V.

The Respondent's failure to request a hearing or to file an appeal or the Respondent's withdrawal of a request for hearing on this **COMPLIANCE ORDER** shall not preclude the Respondent from contesting the findings of facts in any subsequent penalty action addressing the same violation(s), although the Respondent is estopped from objecting to this **COMPLIANCE ORDER** becoming a permanent part of its compliance history.

VI.

Civil penalties of not more than twenty-seven thousand five hundred dollars (\$27,500) for each day of violation for the violation(s) described herein may be assessed. For violations which occurred on August 15, 2004, or after, civil penalties of not more than thirty-two thousand five hundred dollars (\$32,500) may be assessed for each day of violation. The Respondent's failure or refusal to comply with this **COMPLIANCE ORDER** and the provisions herein will subject the Respondent to possible enforcement procedures under La. R.S. 30:2025, which could result in the assessment of a civil penalty in an amount of not more than fifty thousand dollars (\$50,000) for each day of continued violation or noncompliance.

VII.

For each violation described herein, the Department reserves the right to seek civil penalties in any manner allowed by law, and nothing herein shall be construed to preclude the right to seek such penalties.

NOTICE OF POTENTIAL PENALTY

I.

Pursuant to La. R.S. 30:2050.3(B), you are hereby notified that the issuance of a penalty assessment is being considered for the violation(s) described herein. Written comments may be filed regarding the violation(s) and the contemplated penalty. If you elect to submit comments, it is requested that they be submitted within ten (10) days of receipt of this notice.

II.

Prior to the issuance of additional appropriate enforcement action(s), you may request a meeting with the Department to present any mitigating circumstances concerning the violation(s). If you would

like to have such a meeting, please contact Stacy Martinez at 225-219-3378 or stacy.martinez@la.gov within ten (10) days of receipt of this **NOTICE OF POTENTIAL PENALTY**.

III.

The Department is required by La. R.S. 30:2025(E)(3)(a) to consider the gross revenues of the Respondent and the monetary benefits of noncompliance to determine whether a penalty will be assessed and the amount of such penalty. Please forward the Respondent's most current annual gross revenue statement along with a statement of the monetary benefits of noncompliance for the cited violation(s) to the above named contact person within ten (10) days of receipt of this **NOTICE OF POTENTIAL PENALTY**. Include with your statement of monetary benefits the method(s) you utilized to arrive at the sum. If you assert that no monetary benefits have been gained, you are to fully justify that statement. If the Respondent chooses not to submit the requested most current annual gross revenues statement within ten (10) days, it will be viewed by the Department as an admission that the Respondent has the ability to pay the statutory maximum penalty as outlined in La. R.S. 30:2025.

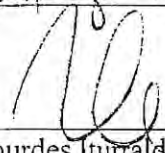
IV.

The Department assesses civil penalties based on LAC 33:I.Subpart1.Chapter7. To expedite closure of this **NOTICE OF POTENTIAL PENALTY** portion, the Respondent may offer a settlement amount to resolve any claim for civil penalties for the violation(s) described herein. The Respondent may offer a settlement amount, but the Department is under no obligation to enter into settlement negotiations. The decision to proceed with a settlement is at the discretion of the Department. The settlement offer amount may be entered on the attached "**CONSOLIDATED COMPLIANCE ORDER AND NOTICE OF POTENTIAL PENALTY REQUEST TO CLOSE**" form. The Respondent must include a justification of the offer. **DO NOT** submit payment of the offer amount with the form. The Department will review the settlement offer and notify the Respondent as to whether the offer is or is not accepted.

V.

This **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is effective upon receipt.

Baton Rouge, Louisiana, this 17th day of August, 2018.



Lourdes Iturralde
Assistant Secretary
Office of Environmental Compliance

Copies of a request for a hearing and/or related correspondence should be sent to:

Louisiana Department of Environmental Quality
Office of Environmental Compliance
Enforcement Division
P.O. Box 4312
Baton Rouge, LA 70821-4312
Attention: Stacy Martinez



LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
 OFFICE OF ENVIRONMENTAL COMPLIANCE
 ENFORCEMENT DIVISION CONSOLIDATED COMPLIANCE ORDER &
 POST OFFICE BOX 4312 NOTICE OF POTENTIAL PENALTY
 BATON ROUGE, LOUISIANA 70821-4312 REQUEST TO CLOSE

Enforcement Tracking No.	AE-CN-14-01078	Contact Name	Stacy Martinez
Agency Interest (AI) No.	671, 17897, 32615	Contact Phone No.	225-219-3378
Alternate ID No.	See Attachment A		
Respondent:	Targa Midstream Services	Facility Name:	See Attachment A
	c/o C T Corporation System	Physical Location:	See Attachment A
	Agent for Service of Process		
	3867 Plaza Tower Dr.	City, State, Zip:	See Attachment A
	Baton Rouge, Louisiana 70816	Parish:	Calcasieu & Plaquemines

STATEMENT OF COMPLIANCE

STATEMENT OF COMPLIANCE	Date Completed	Copy Attached?
A written report was submitted in accordance with Paragraph X of the "Order" portion of the COMPLIANCE ORDER.		
All necessary documents were submitted to the Department within 30 days of receipt of the COMPLIANCE ORDER in accordance with Paragraph(s) II, III, VI, VII, VIII, IX of the "Order" portion of the COMPLIANCE ORDER.		
All necessary procedures were developed in accordance with Paragraph(s) IV, V of the "Order" portion of the COMPLIANCE ORDER.		
All necessary documents were submitted to the Department within 90 days of receipt of the COMPLIANCE ORDER in accordance with Paragraph(s) ? of the "Order" portion of the COMPLIANCE ORDER.		
All items in the "Findings of Fact" portion of the COMPLIANCE ORDER were addressed and the facility is being operated to meet and maintain the requirements of the "Order" portion of the COMPLIANCE ORDER. Final compliance was achieved as of:		

SETTLEMENT OFFER (OPTIONAL)

(check the applicable option)

<input type="checkbox"/>	The Respondent is not interested in entering into settlement negotiations with the Department with the understanding that the Department has the right to assess civil penalties based on LAC 33:1.Subpart1.Chapter7.
<input type="checkbox"/>	In order to resolve any claim for civil penalties for the violations in NOTICE OF POTENTIAL PENALTY (AE-CN-14-01078), the Respondent is interested in entering into settlement negotiations with the Department and would like to set up a meeting to discuss settlement procedures.
<input type="checkbox"/>	In order to resolve any claim for civil penalties for the violations in NOTICE OF POTENTIAL PENALTY (AE-CN-14-01078), the Respondent is interested in entering into settlement negotiations with the Department and offers to pay \$ _____ which shall include LDEQ enforcement costs and any monetary benefit of non-compliance. <ul style="list-style-type: none"> • Monetary component = \$ _____ • Beneficial Environmental Project (BEP) component (optional)= \$ _____ • DO NOT SUBMIT PAYMENT OF THE OFFER WITH THIS FORM- the Department will review the settlement offer and notify the Respondent as to whether the offer is or is not accepted.
<input type="checkbox"/>	The Respondent has reviewed the violations noted in NOTICE OF POTENTIAL PENALTY (AE-CN-14-01078) and has attached a justification of its offer and a description of any BEPs if included in settlement offer.

CERTIFICATION STATEMENT

CERTIFICATION STATEMENT

I certify, under provisions in Louisiana and United States law that provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry, the statements and information attached and the compliance statement above, are true, accurate, and complete. I also certify that I do not owe outstanding fees or penalties to the Department for this facility or any other facility I own or operate. I further certify that I am either the Respondent or an authorized representative of the Respondent.

Respondent's Signature	Respondent's Printed Name	Respondent's Title
Respondent's Physical Address	Respondent's Phone #	Date

MAIL COMPLETED DOCUMENT TO THE ADDRESS BELOW:

Louisiana Department of Environmental Quality
 Office of Environmental Compliance
 Enforcement Division
 P.O. Box 4312
 Baton Rouge, LA 70821
 Attn: Stacy Martinez

ATTACHMENT A

AGENCY INTEREST NUMBER	ALTERNATE ID	FACILITY	LOCATION
671	0520-00002	Targa Midstream Services LLC- Gillis Gas Processing Plant	3807 Luke Powers Road in Lake Charles, Louisiana, 70615
17897	2240-00015	Targa Midstream Services LLC- Venice Gas Processing Plant	end of Tidewater Road in Venice, Louisiana, 70091
32615	2240-00141	Targa Midstream Services LLC- Delta Gathering Station	1565 Tidewater Road, Venice, Louisiana, 70091

JOHN BEL EDWARDS
GOVERNOR



CHUCK CARR BROWN, PH.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE

September 20, 2019

CERTIFIED MAIL (7017 0530 0000 5978 6240)
RETURN RECEIPT REQUESTED

TARGA MIDSTREAM SERVICES LLC
c/o C T Corporation System
Agent for Service of Process
3867 Plaza Tower Drive
Baton Rouge, LA 70816

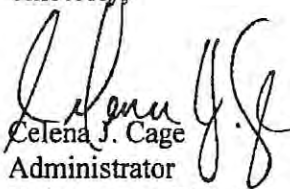
**RE: AMENDED CONSOLIDATED COMPLIANCE ORDER &
NOTICE OF POTENTIAL PENALTY
ENFORCEMENT TRACKING NO. AE-CN-14-01078A
AGENCY INTEREST NOS. 671, 17897, 32615**

Dear Sir:

Pursuant to the Louisiana Environmental Quality Act (La. R.S. 30:2001, et seq.), the attached **AMENDED CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is hereby served on **TARGA MIDSTREAM SERVICES LLC (RESPONDENT)** for the violations described therein.

Any questions concerning this action should be directed to Stacy Martinez at 225-219-3378 or stacy.martinez@la.gov.

Sincerely,


Celena J. Cage
Administrator
Enforcement Division

CJC/SMM/smm
Alt ID Nos. 0520-00002, 2240-00015, 2240-00141
Attachment



c: Targa Midstream Services LLC
3807 Luke Power Road
Lake Charles, LA 70615

**STATE OF LOUISIANA
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE**

IN THE MATTER OF	*	
	*	
TARGA MIDSTREAM SERVICES LLC	*	ENFORCEMENT TRACKING NO.
CALCASIEU & PLAQUEMINES PARISHES	*	
ALT ID NOS. 0520-00002, 2240-0015,	*	AE-CN-14-01078
2240-00141	*	
	*	AGENCY INTEREST NOS.
	*	
PROCEEDINGS UNDER THE LOUISIANA	*	671, 17897, 32615
ENVIRONMENTAL QUALITY ACT,	*	
La. R.S. 30:2001, ET SEQ.	*	

**AMENDED CONSOLIDATED COMPLIANCE ORDER &
NOTICE OF POTENTIAL PENALTY**

The Louisiana Department of Environmental Quality (the Department) hereby amends the **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY, ENFORCEMENT TRACKING NO. AE-CN-14-01178** issued to **TARGA MIDSTREAM SERVICES LLC (RESPONDENT)** on August 17, 2018 in the above-captioned matter as follows:

I.

The Department hereby amends Paragraph IV.P of the Findings of Fact to read as follows:

“P. Based on the September 29-30, 2011 stack test, the water injection ratio (WIR) was established as 0.82 to meet the NO_x requirement of <= 25 ppm @ 15% O₂ as set forth in 40 CFR 60.4320(a). The following are the reported causes of deviation for operating outside of the of the NO_x requirement of <= 25 ppm @ 15% O₂:

	REPORT (Date)	PERMIT NUMBER (Specific Requirement number)	EMISSION POINT	DATE INCIDENT BEGAN (Duration)	OPERATING PARAMETER	CAUSE OF DEVIATION	CORRECTIVE ACTION
1	2012 First Semiannual Monitoring Report (9.27.2012) & 2012 Semiannual Excess Emissions Report (7.30.2012)	2240-00015- V5 (66)	EQT 0046 (Cryo 2 2500 Turbine)	5.4.2012 (1 hour) 5.8.2012 (2 hours) 5.9.2012 (2 hours) 5.10.2012 (4 hours) 5.12.2012 (2 hours) 5.13.2012 (6 hours)	NOx ≤ 25 ppm @ 15 % O ₂	WIR below 0.82	The water value follows the fuel meter signal, and there is some swing in the injection rate. The process set point was raised from 0.83 to 0.84 to allow for process variability
2	2012 First Semiannual Monitoring Report (9.27.2012) & 2012 Semiannual Excess Emissions Report (7.30.2012)	2240-00015- V5 (66)	EQT 0046 (Cryo 2 2500 Turbine)	6.14.2012 (13 hours) 6.15.2012 (9 hours) 6.16.2012 (8 hours) 6.17.2012 (2 hours) 6.19.2012 (1 hour)	NOx ≤ 25 ppm @ 15 % O ₂	WIR below 0.82	The process set point has been raised from 0.83 to 0.84 to allow for process variability
3	2012 First Semiannual Monitoring Report (9.27.2012) & 2012 Semiannual Excess Emissions Report (7.30.2012)	2240-00015- V5 (66)	EQT 0046 (Cryo 2 2500 Turbine)	6.26.2012 (45 minutes)	NOx ≤ 25 ppm @ 15 % O ₂	Data Loss Water Injection	The process set point has been raised from 0.83 to 0.84 to allow for process variability
4	2015 Second Semiannual Monitoring Report (3.28.2016)	2240-00015- V6 (111)	EQT 0046 (Cryo 2/ LM2500)	7.28.2015 (10 minutes)	NOx ≤ 25 ppm @ 15% O ₂	Outage on injection pump before shutdown; WIR below required 4 hour average; During startup shutdown sequence water injection delayed briefly	Startup and shutdown performed to safely bring the turbine and water injection back on line as quickly as possible
5	2016 First Semiannual Monitoring Report (9.26.2016)	2240-00015- V6 (111)	EQT 0046 (Cryo 2/ LM2500)	3.11.2016 (20 minutes)	NOx ≤ 25 ppm @ 15% O ₂	Water injection pump went down; WIR below required 4 hour average; During startup shutdown sequence water injection delayed briefly	Startup and shutdown performed to safely bring the turbine and water injection back on line as quickly as possible

Each failure to operate according to permitted requirements is a violation of any applicable permit and associated requirement(s) listed above, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2)."

II.

The Department hereby adds Paragraph IV.Q and IV.R to the Findings of Fact section of Enforcement Tracking No. AE-CN-14-01078:

“Q. The Respondent reported the following emission exceedances for EQT 0009 (Process Flare):

	REPORT (date)	REPORTING YEAR	PERMIT NO.	POLLUTANT* (actual emissions in tons)	POLLUTANT (permit limit in tons per year)	POLLUTANT* (amount above permit limit in tons)
1	Correspondence (11.2.2018)	2013	2240-00015-V5	CO (15.943) NO _x (2.93) PM10 (0.401) VOC (1.63)	CO (1.34) NO _x (0.25) PM10 (0.02) VOC (0.51)	CO (14.603) NO _x (2.68) PM10 (0.399) VOC (1.12)
2	Correspondence (11.2.2018)	2014	2240-00015-V5 & 2240-00015-V6	CO (8.967) NO _x (1.99) PM10 (0.168) VOC (1.166)	CO (1.34) NO _x (0.25) PM10 (0.02) VOC (0.51)	CO (7.627) NO _x (1.74) PM10 (0.148) VOC (0.656)
3	Correspondence (11.2.2018)	2015	2240-00015-V6	CO (15.865) NO _x (2.917) PM10 (0.309) SO ₂ (0.024) VOC (1.89)	CO (1.34) NO _x (0.25) PM10 (0.02) SO ₂ (<0.01) VOC (0.51)	CO (14.525) NO _x (2.667) PM10 (0.307) SO ₂ (0.014) VOC (1.38)

*The Respondent did not remove the General Condition XVII Activities or startup, shutdown, and malfunction events for the reported emissions.

Each emission exceedance is a violation of any applicable permit listed above, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

R. In correspondence dated November 2, 2018, the Respondent reported that EQT 0020 (Plant Fire Water Pump) operated for approximately 274.04 hours in 2015, which was above the twenty-six (26) hours of operation in Title V Permit No. 2240-00015-V6. The following are the reported emission exceedances in 2015 due to the increased operation of EQT 0020:

POLLUTANT	2015 ACTUAL EMISSIONS (tons/year)	PERMIT LIMIT (tons/year)	AMOUNT ABOVE PERMIT LIMITS (tons)
CO	0.926	0.06	0.866
NO _x	0.55	0.04	0.51

Each emission exceedance is a violation of Title V Permit No. 2240-00015-V6, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).”

III.

The Department hereby adds Paragraph VIII. G to the Findings of Fact section of Enforcement Tracking No. AE-CN-14-01078:

“G. According to the 2017 First Title V Semiannual Monitoring Report dated September 25, 2017, the Respondent reported that the annual report, as required by 40 CFR 60.5420(b), for EQT 0042 (Vapor Recovery System Compressor-G3306 TA) was submitted on or about February 6, 2017, which was past the deadline of January 14, 2017. The failure to submit an annual report as required by 40 CFR 60.5420(b) is a violation of Specific Requirement No. 106 of Title V Permit No. 2240-00141-V9, 40 CFR 60.5420(b), which language has been adopted as a Louisiana regulation in LAC 33:III.3003, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2). This violation was also noted as an area of concern during an inspection of the facility on November 27, 2018.”

IV.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **AMENDED CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY**, a written report that includes a detailed description of the circumstances surrounding the cited violations added in this **AMENDED CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** and actions taken or to be taken to achieve compliance with the Order Portion of this **AMENDED CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY**. This report and all other reports or information required to be submitted to the Enforcement Division by this **AMENDED CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** shall be submitted to:

Office of Environmental Compliance
Post Office Box 4312
Baton Rouge, Louisiana 70821-4312
Attn: Stacy Martinez
Re: Enforcement Tracking No. AE-CN-14-01078A
Agency Interest Nos. 671, 17897, 32615

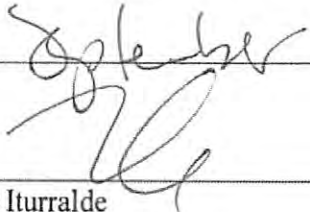
V.

The Department incorporates all of the remainder of the original **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY, ENFORCEMENT TRACKING NO. AE-CN-14-01078** and **AGENCY INTEREST NOS. 671, 17897, 32615** as if reiterated herein.

VI.

This **AMENDED CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is effective upon receipt.

Baton Rouge, Louisiana, this 20th day of September, 2019.



Lourdes Iturralde
Assistant Secretary
Office of Environmental Compliance

Copies of a request for a hearing and/or related correspondence should be sent to:

Louisiana Department of Environmental Quality
Office of Environmental Compliance
Enforcement Division
Post Office Box 4312
Baton Rouge, LA 70821-4312
Attention: Stacy Martinez