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AIR PERMITS SECTION
6PD-R

Ms. Melanie Magee
US Environmental Protection Agency
Region 6, Air Permitting Division
1445 Ross Avenue (6EN)
Dallas, TX 75202

Re: Targa Gas Processing LLP
40 C.F.R. § 52.21(w) Permit Rescission Request
EPA-Issued Permit No. PSD-TX-106793-GHG

Dear Ms. Magee,

Targa Gas Processing LLP ("Targa") is submitting this request for rescission of Prevention of Significant Deterioration ("PSD") Permit for Greenhouse Gas Emissions Number PSD-TX-106793-GHG ("GHG Permit") for the Longhorn Gas Plant, which EPA issued on June 17, 2013. This request is made in accordance with 40 C.F.R. § 52.21(w), which requires EPA to rescind a PSD permit if it can be shown that the permit would not have been required but for GHG emissions.

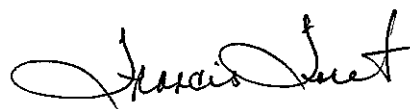
Targa applied for the GHG Permit based solely on EPA's determination under 40 C.F.R. § 52.21(b)(49) that the Longhorn Gas Plant's projected GHG emissions triggered PSD permit review. See EPA Statement of Basis, Permit No. PSD-TX-106793-GHG (March 2013), available at <http://archive.epa.gov/region6/6pd/air/pd-r/ghg/web/pdf/targa-longhorn-sob.pdf> ("EPA concludes Targa LGP's application is subject to PSD review for the pollutant GHGs, as described at 40 C.F.R. § 52.21(b)(1) and (b)(49)(v). ... TCEQ issued a non-rule standard permit for oil and gas production facilities, registration #106793, and the applicant therefore represents that no other regulated NSR pollutants are subject to PSD review.")

Federally-enforceable limits on all regulated non-GHG pollutants are imposed in Standard Permit No. 106793, as issued by TCEQ on December 5, 2012. The allowable emission rate table demonstrates that all non-GHG emissions are below respective PSD thresholds. The standard permit, as well as EPA's and TCEQ's prior findings, establish that the Longhorn Gas Plant did not have the potential to emit any regulated pollutant above the major source thresholds applicable to it, except for GHG, at the time it obtained the GHG Permit.

I hereby certify that the GHG Permit issued by EPA Region 6 is not being used, or planned to be used, for any other regulatory or compliance and enforcement purposes, and the information contained in this rescission request submittal is factual and correct.

Please contact Melanie Roberts at 713-584-1422 with any questions.

Regards,

A handwritten signature in black ink, appearing to read "Francis Foret". The signature is fluid and cursive, with a large initial "F" and a stylized "Foret" following.

Francis Foret
SVP, Targa Gas Processing LLP

Magee, Melanie

From: Ruediger, Sarah E. <sruediger@targaresources.com>
Sent: Friday, April 01, 2016 1:33 PM
To: Magee, Melanie
Subject: Longhorn GHG PSD Rescission Additional Information Request
Attachments: Longhorn Standard Permit 12-5-12.pdf; Longhorn PSD GHG Application (Section 9 - Federal Permitting Applicability) 2-17-12.pdf

Ms. Magee,

Per your request for additional information to rescind Targa's Longhorn Prevention of Significant Deterioration for Greenhouse Gas Emissions Permit, attached is the Standard Permit for the Longhorn Gas Plant. Longhorn was a Greenfield site and this permit encompasses all site-wide emissions and shows it is a minor PSD source with respect to all non-GHG emissions.

Also attached is Section 9 of the Application for Prevention of Significant Deterioration for Greenhouse Gas Emissions submitted. Section 9.2 explains the PSD designation for the site and that it is only major with respect to GHG emissions. The Site-Wide Emission Summary for PSD Applicability table at the end of the section shows the maximum emission rates from the project with respect to PSD limits. The site is below the PSD major source threshold for all non-GHG emissions.

Thank you for your help. Please let me know if you have any additional questions and please don't hesitate to call me at 713-584-1423.

Sarah

Sarah Ruediger, Environmental Specialist
Targa Resources 1000 Louisiana, Suite 4300, Houston TX 77002
Office (713) 584-1423 | Mobile (314) 724-8698 | sruediger@targaresources.com

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9. FEDERAL REGULATORY REQUIREMENTS

This section addresses the applicability of the following parts of 40 CFR for the equipment at the proposed Longhorn Gas Plant:

- > Nonattainment New Source Review
- > Prevention of Significant Deterioration

All applicable state and federal requirements (e.g., New Source Performance Standards and National Emission Standards for Hazardous Air Pollutants), with the exception to those pertaining to GHG emissions, are addressed in the TCEQ minor source state NSR permit application. The TCEQ application is included in Appendix G as reference.

9.1. NNSR APPLICABILITY REVIEW

The Longhorn Gas Plant will be located near Decatur in Wise County, Texas. Wise County is currently classified as an attainment/unclassified area for all criteria pollutants.¹² In a letter dated December 9, 2011, the U.S. EPA expressed its intent to designate Wise County as nonattainment for the eight-hour ozone standard and include the county in the existing DFW ozone nonattainment area.¹³ In the event of a redesignation of Wise County to nonattainment, the proposed Longhorn Gas Plant may be potentially subject to NNSR requirements for NO_x and VOC.

DFW is currently classified as a serious ozone nonattainment area for the eight-hour ozone standard.¹⁴ It is anticipated that if Wise County is designated as nonattainment for the eight-hour ozone standard, the classification for the county will also be serious. In a serious nonattainment ozone county, NNSR major source thresholds are 50 tpy for NO_x and VOC, each. As shown in the table included at the end of this section, the proposed NO_x and VOC emissions from the Longhorn Gas Plant will be less than 50 tpy, each. Therefore, the proposed Longhorn Gas Plant would not be considered a major source for ozone precursors under the proposed nonattainment designation, and NNSR permitting requirements will not apply to the proposed facility even if Wise County is redesignated a serious ozone nonattainment area under the eight-hour standard.

9.2. PSD APPLICABILITY REVIEW

The proposed Longhorn Gas Plant will be a new major source with respect to GHG emissions and subject to PSD permitting requirements under the GHG Tailoring Rule because emissions of CO_{2e} will be greater than 100,000 tpy.

The proposed facility will be located in Wise County, Texas, which is currently classified as attainment/unclassified for all criteria pollutants.¹⁵ PSD permitting requirements apply to any new major stationary source located in areas designated as attainment/unclassified. Since the proposed Longhorn Gas Plant will be a major source for GHG emissions, EPA requires non-GHG emissions to be compared to the significant emission rates (SER) in accordance with EPA's longstanding "major for one, major for all" PSD policy to determine PSD applicability.¹⁶

¹² Per 40 CFR §81.344 (Effective April 5, 2005).

¹³ Letter from Dr. Al Armendariz, U.S. EPA Region 6 Administrator, to Texas Governor Rick Perry, dated December 9, 2011.

¹⁴ Per 40 CFR §81.344 (Effective January 19, 2011).

¹⁵ Per 40 CFR §81.344 (Effective April 5, 2005).

¹⁶ Triggering PSD at Non-Anyway Sources and Modifications, EPA Q&A Document, dated March 15, 2011. <http://www.epa.gov/nsr/ghgdocs/TriggeringPSDatnonAnywaySourcesandMods.pdf>.

As shown in the table included at the end of this section, emissions for all non-GHG pollutants are less than both major source thresholds and their respective SER. Therefore, the proposed Longhorn Gas Plant will be a minor source with respect to all non-GHG emissions and the facility is subject to the jurisdiction of the TCEQ for such emissions.

Accordingly, Targa is submitting applications to both agencies to obtain the requisite authorizations to construct. The minor source state NSR permit application submitted to TCEQ is included in Appendix G of this GHG PSD permit application for reference.

Site-Wide Emission Summary for PSD Applicability
Fugitive emissions are not included in calculations per 30 TAC § 122.10(13)(C).

Normal Operations Summary

EPN	FIN	Description	Annual Emissions (tpy)							
			NO _x	CO	VOC	PM	PM ₁₀	PM _{2.5}	SO ₂	CO ₂ e
1	1	TEG-1 Glycol Reboiler	0.96	0.53	0.04	0.04	0.04	0.04	0.00	1,024.92
2	2	TEG Dehydrator During RTO Downtime	--	--	4.15	--	--	--	--	5.00
3	3	HTR-1 Regen Heater	5.43	4.03	7.62	0.39	0.39	0.39	0.04	6,354.99
4	4	HTR-2 Hot Oil Heater	21.46	31.76	2.28	3.15	3.15	3.15	0.25	50,223.01
5	2, 15	RTO-1 Regen Thermal Oxidizer	0.48	14.55	3.21	--	--	--	13.16	116,291.83
6	6	lare-1 Flare (Pilot)	0.09	0.18	6.09E-04	--	--	--	3.46E-03	76.87
11	11	MEOH-1 Methanol Storage	--	--	0.06	--	--	--	--	--
15	15	Amine Still Vent During RTO Downtime	--	--	1.41	--	--	--	--	2,027.44
16	16	Produced Water Tank 210 bbl	--	--	1.12	--	--	--	--	--
17	17	LP Condensate Tank 1 (During VRU Downtime)	--	--	0.02	--	--	--	--	--
18	18	LP Condensate Tank 2 (During VRU Downtime)	--	--	0.02	--	--	--	--	--
21	21	Open Drain Sump	--	--	0.01	--	--	--	--	--
Total Normal Operations Emissions			28.42	51.05	19.92	3.58	3.58	3.58	13.45	176,004.06

MSS Operations Summary

EPN	FIN	Description	Annual Emissions (tpy)							
			NO _x	CO	VOC	PM	PM ₁₀	PM _{2.5}	SO ₂	CO ₂ e
5-MSS	5-MSS	RTO-1 Startup	1.80E-03	1.80E-03	6.34E-05	--	--	--	6.92E-06	1.40
6-MSS	6-MSS	lare-1 Flare MSS	6.07E-03	1.21E-02	2.95E-01	--	--	--	4.74E-05	9.87
Total MSS Emissions			7.87E-03	1.39E-02	2.95E-01	0.00	0.00	0.00	5.43E-05	11.28

Total Operations Summary

EPN	FIN	Description	Annual Emissions (tpy)							
			NO _x	CO	VOC	PM	PM ₁₀	PM _{2.5}	SO ₂	CO ₂ e
		Normal Operations	28.42	51.05	19.92	3.58	3.58	3.58	13.45	176,004.06
		MSS Activities	7.87E-03	1.39E-02	2.95E-01	0.00	0.00	0.00	5.43E-05	11.28
Total Site-wide Emissions			28.43	51.06	20.22	3.58	3.58	3.58	13.45	176,015.34

Comparison to PSD Limits¹

Prevention of Significant Deterioration (PSD) Major Source Threshold	250	250	250	250	250	250	250	250	250	100,000
Is the site above PSD major source threshold?	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES
Significant Emission Rates (SER)	40	100	40	--	15	10	40	--	40	--
Is the site above SERs?	NO	NO	NO	--	NO	NO	NO	--	NO	--

¹ According to EPA guidance, the "major for one, major for all" PSD policy applies to GHGs for any project occurring on or after July 1, 2011. Therefore, if a site is a major source of GHGs, then the criteria pollutant emissions must be compared to the Significant Emission Rates to determine PSD applicability.

Comparison to NNSR Limits¹

Nonattainment New Source Review (NNSR) Limits	50	--	50	--	--	--	--	--	--	--
Is the site above NNSR limits?	NO	--	NO	--	--	--	--	--	--	--

¹ Wise County is currently classified as an attainment/unclassified area for all criteria pollutants. In a letter dated December 9, 2011, the U.S. EPA expressed their intent to designate Wise County as nonattainment for the eight-hour ozone standard, including the county in the existing Dallas-Fort Worth serious ozone nonattainment area. In the event of a redesignation of Wise County to nonattainment, the proposed Longhorn Gas Plant would be potentially subject to NNSR requirements for NO_x and VOC.

Bryan W. Shaw, Ph.D., *Chairman*
Carlos Rubinstein, *Commissioner*
Toby Baker, *Commissioner*
Zak Covar, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Protecting Texas by Reducing and Preventing Pollution

December 5, 2012

MR CLARK WHITE
VP & REGION MANAGER
TARGA MIDSTREAM SERVICES LLC
1000 LOUISIANA ST STE 4300
HOUSTON TX 77002-5036

Standard Permit Registration Number:	106793	Renewal Date:	December 5, 2022
Location:	Ne On Fm 51 From Us 380 Turn L After 5.4 Mi Drive 1.25 Mi To Plant		
City/County:	Decatur, Wise County		
Project Description/Unit:	Longhorn Gas Plant		
Regulated Entity Number:	RN106346745		
Customer Reference Number:	CN604041806		
New or Existing Site:	New		
Affected Permit (if applicable):	None		
Standard Permit Type:	Oil and Gas Production Facilities (non rule effective 2/27/11)		

Targa Gas Processing LLC has registered the site wide emissions associated with the Longhorn Gas Plant under the standard permit listed above as authorized by the Commissioners pursuant to Title 30 Texas Administrative Code § 116.602 (30 TAC § 116.602). Emissions are listed on the attached table. For rule information see www.tceq.texas.gov/permitting/air/nav/standard.html. Planned MSS emissions for fugitives, flares, pigging, and blowdowns have been reviewed. These authorized MSS emissions are included on the emissions table. No other planned MSS emissions will be authorized under this registration.

The company is also reminded that these facilities may be subject to and must comply with other state and federal air quality requirements. In addition, under the applicability section for all Standard Permits, § 116.610(a)(2) states that "Construction or operation of the project must be commenced prior to the effective date of a revision to this subchapter." If you have questions, please contact Mr. Robert Chavez at (512) 239-0442. This action is taken under authority delegated by the Executive Director of the TCEQ.

Sincerely,

A handwritten signature in black ink, appearing to read "Anne M. Inman".

Anne M. Inman, P.E., Manager
Rule Registrations Section
Air Permits Division
Texas Commission on Environmental Quality

cc: Air Section Manager, Region 4 - Fort Worth
Project Number: 185781

Standard Permit Maximum Emission Rates Table
Permit Number 106793

The facilities and emissions included in this table have been represented and reviewed as the maximum emissions authorized by this standard permit registration.

ESTIMATED EMISSIONS															
EPN / Emission Source	Specific VOC or Other Pollutants	VOC		NOx		CO		PM ₁₀		H ₂ S		SO ₂		HAPs	
		lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy
TEG-1/Glycol Reboiler		0.01	0.04	0.22	0.96	0.12	0.53	0.01	0.04			<0.01	<0.01		
HTR-1/Regen Heater		1.74	7.62	1.24	5.43	0.92	4.03	0.09	0.39			0.01	0.04		
HTR-2/Hot Oil Heater		0.52	2.28	4.9	21.46	7.25	31.76	0.72	3.15			0.06	0.25		
RTO-1/Regen Thermal Oxidizer		1.61	7.05	0.11	0.48	3.32	14.55			0.02	0.07	2.81	12.29	0.85	3.74
Flare-1/Flare (pilot)		<0.01	<0.01	0.07	0.32	0.14	0.63			<0.01	<0.01	<0.01	0.01		
Flare-2/Flare (pilot)		<0.01	<0.01	0.02	0.09	0.04	0.19			<0.01	<0.01	<0.01	<0.01		
MEOH-1/Methanol Storage		0.03	0.06												
16/Produced water tank 210 bbl		0.04	0.11											<0.01	<0.01
LP/Condensate Tank 1		28.36	5.15											0.2	0.04
LP/Condensate Tank 2		28.36	5.15											0.2	0.04
21/Open Drain Sump		0.01	0.01												
FUG-1/Plant Wide Fugitive Components		1.16	5.09											0.05	0.21
FUG-2/Truck Loading		38.62	0.64											2.57	0.04
5-MSS/RTO-Startup		0.02	<0.01	0.45	<0.01	0.45	<0.01					<0.01	<0.01		
6-MSS/Flare-1 Flare MSS		13.99	0.3	1.79	<0.01	3.58	0.01					0.03	<0.01	<0.01	<0.01
7-MSS/PR-1 16" Receiver		1.06	0.03											0.03	<0.01
8-MSS/PR-2 12" Receiver Flare 2-Anime & Dehydrator During RTO		1.06	0.03											0.03	<0.01
9-MSS/Downtime		2.95	0.22	0.64	0.05	1.28	0.1					2.64	0.2	1.69	0.13
20-MSS/Refrigerant Unloading		0.17	<0.01												
FUG-MSS/Plant Wide MSS Fugitives		1.66	0.02											0.05	<0.01
TOTAL EMISSIONS (TPY):		33.81		28.8		51.8		3.58		0.07		12.8		4.21	
MAXIMUM OPERATING SCHEDULE:		Hours/Day		Days/Week		Weeks/Year		Hours/Year		8760					

**Fugitive emissions are an estimate only and should not be considered as a maximum allowable