Pitre, Randy

From: Ashe, James N <JNASHE@eprod.com>
Sent: Tuesday, May 27, 2014 4:33 PM
To: Pitre, Randy
Cc: Lieb, James
Subject: RE: Lindrith Compressor Station
Attachments: Lindrith Emission Comparison.pdf

Document No. 14

Randy,

The Emergency Generator at Lindrith was installed in 1995. Apparently we managed to exclude it from the Synthetic Minor application of 10.2.13. An emissions comparison between the 2013 Part 71 update & the minor NSR application is attached. It appears the small difference in the emissions is entirely due to the emergency generator. Please let me know if we need to provide additional information or submittal.

Regards,

Neely

From: Pitre, Randy [mailto:Pitre.Randy@epa.gov]
Sent: Monday, May 05, 2014 7:41 AM
To: Ashe, James
Cc: Bartley, Richard; Robinson, Jeffrey; Martinez, Maria
Subject: Lindrith Compressor Station

Neely,

In review of the Part 71 Revision to the previously submitted Application, we noticed that this update contained an Emergency Generator, and the summary emissions were different than the summary emissions within the Synthetic Minor application dated October 2, 2013. Please advise of the date that the emergency generator was installed and became operational, and please explain the difference in total emissions between the Synthetic Minor Application and the Part 71 Revision.

Randy L. Pitre
Air Permits Section
U.S. EPA Region 6
Office: (214) 665-7299

Application	Pollutant	CAS No.	Emissions (tons/yr)									Difference (tons/yr)	Reason
			A-01	A-02	A-03	EMERGEN	FUGVOC	MSS	TLOAD	TBATTERY	Total		
Minor NSR	Particulate Matter (PM_{10})		0.97	0.97	0.97						2.90	0.00	
Part 71 Update			0.97	0.97	0.97	0.002					2.90		
Minor NSR	Particulate Matter ($PM_{2.5}$)		0.97	0.97	0.97						2.90	0.00	
Part 71 Update			0.97	0.97	0.97	0.002					2.90		
Minor NSR	Sulfur Dioxide (SO_2)		1.42	1.42	1.42						4.27	0.00	
Part 71 Update			1.42	1.42	1.42	0.002					4.27		
Minor NSR	Nitrogen Oxides (NO_x)		22.09	22.09	22.09						66.26	0.02	addition of EMERGEN
Part 71 Update			22.09	22.09	22.09	0.02					66.28		
Minor NSR	Carbon Monoxide (CO)		11.83	11.83	78.88						102.54	0.03	addition of EMERGEN
Part 71 Update			11.83	11.83	78.88	0.03					102.57		
Minor NSR	Volatile Organic Compounds (VOC)		20.54	20.54	29.34		3.31	23.85	2.23	37.39	137.21	0.01	addition of EMERGEN
Part 71 Update			20.54	20.54	29.34	0.01	3.31	23.85	2.23	37.39	137.22		
Minor NSR	Acetaldehyde	00075-07-0	0.57	0.57	0.81						1.94	0.00	
Part 71 Update			0.57	0.57	0.81						1.94		
Minor NSR	Acrolein	00107-02-8	0.35	0.35	0.50						1.19	0.00	
Part 71 Update			0.35	0.35	0.5						1.19		
Minor NSR	Benzene	00071-43-2	0.03	0.03	0.04		0.00	0.07	0.01	0.12	0.31	0.00	
Part 71 Update			0.03	0.03	0.04		0.00	0.07	0.01	0.12	0.31		
Minor NSR	Formaldehyde	00050-00-0	9.06	9.06	12.94						31.05	0.00	
Part 71 Update			9.06	9.06	12.94						31.05		
Minor NSR	Methanol	00067-56-1	0.17	0.17	0.24						0.58	0.00	
Part 71 Update			0.17	0.17	0.24						0.58		
Minor NSR	n-Hexane	00110-54-3	0.08	0.08	0.11		0.03	0.55	0.05	0.84	1.72	0.00	
Part 71 Update			0.08	0.08	0.11		0.03	0.55	0.05	0.84	1.72		
Minor NSR	Toluene	00108-88-3	0.03	0.03	0.04				0.01	0.11	0.21	0.00	
Part 71 Update			0.03	0.03	0.04				0.01	0.11	0.21		
Minor NSR	Xylene (mixed isomers)	01330-20-7	0.01	0.01	0.02				0	0	0.04	0.00	
Part 71 Update			0.01	0.01	0.02				0	0	0.04		
Minor NSR	GHG (CO_2e)		11,304	11,304	11,305		80	1,437	9	110	35549.33	4.67	addition of EMERGEN
Part 71 Update			11,304	11,304	11,305	5	80	1,437	9	110	35554.00		

Pitre, Randy

Document No. 15

From: Pitre, Randy
Sent: Friday, September 19, 2014 10:20 AM
To: Ashe, James N
Cc: Robinson, Jeffrey; Bartley, Richard; Martinez, Maria
Subject: Lindrith Compressor Station Permit Number R6FOPP71-03
Attachments: Lindrith Modification Letter 5-14-10.pdf

Neely,

Pursuant to the Enterprise Products May 14, 2010 letter titled "Revision to Previously Submitted Application Dated May 12, 2008," addressed to Mr. Robinson, Chief, Air Permits Section, 6PD-R (see attached letter), the second paragraph indicates that four 500-bbl tanks were located 225 yards southeast of the facility associated with the Pipeline Pigging Operations. Then in the third paragraph Enterprise states " The result of rerouting the product flow was that most of the VOC liquids no longer relieve to the tanks, but instead, remain in the pipeline to be later removed and processed at a downstream facility." The emissions from the four 500-bbl Tanks at the Pipeline Pigging Operations had been included in the summary emissions for the Lindrith Compressor Station. Therefore, we believe that the Pipeline Pigging Operations are adjacent and associated with the Lindrith Compressor Station. Please update the Lindrith Application Emissions Sources to include the Pipeline Pigging Operations at the Lindrith Compressor Station.

Randy L. Pitre
Air Permits Section
U.S. EPA Region 6
Office: (214) 665-7299

Pitre, Randy

Document No. 16

From: Pitre, Randy
Sent: Friday, March 20, 2015 3:35 PM
To: Ashe, James
Cc: Bartley, Richard; Robinson, Jeffrey
Subject: Lindrith Compressor Station

Neely,

EPA Region 6 has reviewed the "Gas Dedication, Gathering, and Processing Agreement" (Agreement) submitted as Attachment D to Enterprise's October 24, 2012 letter. We note that Enterprise has claimed the Agreement as confidential business information (CBI). Our review of the terms and conditions of the Agreement supports a finding that the wells which supply gas to the Lindrith Compressor Station are not controlled (either directly or indirectly) by Enterprise. However, because we cannot include the Agreement itself in the public record due to your CBI claim, we request that Enterprise submit, if possible, a statement confirming our finding that Enterprise has no authority to guide, manage, or regulate the pollutant-emitting activities of any of the wells that deliver gas to Enterprise for transport or processing, including the power to make or veto decisions to implement major emission control measures or influence production levels or compliance with environmental regulations.

In addition, EPA Region 6 requests that Enterprise provide the following information about Attachment B "Enterprise Assets in San Juan Basin" to Enterprise's October 24, 2012 letter:
With respect to the "Chaco Sites," please indicate the distance of each asset from the Lindrith Compressor Station.

Upon receipt of this information we will continue our processing your application to renew the Title V permit for the Lindrith Compressor Station, and we will email you a copy of the draft permit to review prior to public comment.

Thank you,

Randy L. Pitre
Air Permits Section
U.S. EPA Region 6
Office: (214) 665-7299

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

September 21, 2015

Document No. 17

STATEMENT OF BASIS

For draft Air Pollution Control Title V Permit to Operate for Permit Renewal No. R6NM-03-R1 (replaces R6FOPP71-03).

The issuing office is: U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue
Dallas, TX 75202-2733

The applicant is Enterprise Field Services, LLC
P.O. Box 4324
Houston, Texas 77210 - 4324
Lindrith Compressor Station
Jicarilla Apache Reservation, Rio Arriba County, New Mexico

1. Environmental Protection Agency (EPA) Authority to Issue Part 71 Permits Pursuant to Title V of the Clean Air Act (CAA)

On July 1, 1996 (61 Federal Register (FR) 34202), EPA adopted regulations codified at 40 Code of Federal Regulations (CFR) Part 71 setting forth the procedures and terms under which the Agency would administer a Federal Operating Permits Program, as required by Title V of the federal Clean Air Act, 42 U.S.C. § 7661a. These regulations were updated on February 19, 1999 (64 FR 8247) to incorporate EPA's approach for issuing Federal operating permits (Title V or Part 71 permits) to covered stationary sources in Indian country.

As described in 40 CFR § 71.4(a), EPA will implement a part 71 program in areas where a State, local, or tribal agency has not developed an approved part 70 program. Unlike States, Indian Tribes are not required to develop Operating Permits Programs, though EPA encourages Tribes to do so. See, e.g., Indian Tribes: Air Quality Planning and Management (63 FR 7253, February 12, 1998) (also known as the "Tribal Authority Rule"). Therefore, within Indian country, EPA will administer and enforce a part 71 Federal Operating Permits Program for stationary sources until a Tribal Nation receives approval to administer their own Operating Permit Program.

2. Proposed Changes to the Title V Permit

The following changes are being proposed by this Title V (Part 71) permit renewal action:

a. Update emissions sources and tables to reflect current practices and operations at the source, including emissions of all regulated pollutants from applicable emissions units.

b. Update permit conditions and enforceable emission limitations to ensure the facility remains a synthetic minor source for PSD purposes.

c. Add work practice requirements, testing, monitoring, recordkeeping, and reporting requirements for all applicable emission sources, including the IC engines, two of which are equipped with a catalytic converter for emissions control.

d. Include the words "emissions limitation" in Permit Condition 5.2.1, to reflect inclusion of emissions limitations in this Title V permit.

e. Include updated address for submittal of fee payments and fee filing form in Permit Condition 5.1.4.

f. Include credible evidence language, in accordance with requirements under 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 FR 8314 (Feb. 24, 1997).

g. Remove Section 4 entitled "Additional Requirements to be Implemented in Future Activities Under the Permit" from the November 17, 2003 Title V permit. The Title V permit does not authorize construction activities. Any future construction activities will be handled under a separate permitting action and any applicable consultation requirements under the Endangered Species Act or National Historic Preservation Act will be addressed at that time.

h. Include a requirement to measure the monthly and annual volumes of condensate that pass through the TBATTERY emission unit.

3. The Jicarilla Apache Nation

a. Geographical boundaries: The Jicarilla Apache reservation is located in north central New Mexico, in Rio Arriba and Sandoval Counties, near the state border with Colorado. The reservation's geography ranges from 6,400 feet above sea level in high desert to over 10,600 feet above sea level in rugged mountains. The reservation contains

numerous lakes and twenty major watersheds. The only town, Dulce, is located in the northern portion of the reservation.

b. Current Leadership and Contact Information:

Ty Vicente , President
Ernest Petago, Vice President
Jicarilla Apache Nation
P. O. Box 507
Dulce, NM 87528
Tel: (575) 759-3242
Fax: (575) 759-3005

c. Environmental Protection Office:

Cordel TeCube, Program Director
Danny Wells, Environmental Technician
(epojat@yahoo.com)
Phone: (575) 759-7421
Fax: (575) 759-7565

d. Local air quality and attainment status: The reservation is in an attainment area for all criteria pollutants. The Jicarilla Apache reservation is located within the Four Corners region, which is characterized as a rural area with oil and gas production but no heavy industry.

4. Facility Information

a. Location: The Enterprise Field Services, LLC, Lindrith Compressor Station is located approximately 20 miles West of Lindrith, New Mexico, at UTM Zone 13 UTM H 285.22 UTM V 4020.98. The mailing address is:

Enterprise Field Services, LLC
P. O. Box 4324
Houston, Texas 77210-4324

b. Facility Contact/ Responsible Official

The facility contact is:
Jim Lieb, Senior Environmental Engineer

The responsible official is:
Graham Bacon
Senior Vice President – Operations
Enterprise Products Company
1100 Louisiana Street
Houston, Texas 77210-4324

c. Source Description - Operations and Products

The Lindrith Compressor Station, with Standard Industrial Classification code 1311, is a natural gas compressor station that accepts produced natural gas gathered from various wellheads from the gas field surrounding the facility and compresses this gas for delivery to natural gas processing facilities. This is done on a contract basis as a service to the natural gas producers. The gas is gathered through a pipeline network and compressed via three (3) 4-stroke lean burn reciprocating internal combustion engines (4SLB RICE) for injection into a pipeline for transportation to the gas plant. The three RICE are Caterpillar Model 3612LE natural gas-fired engines (Unit No. A-01 with Serial No. 1YG00055, Unit No. A-02 with Serial No. 1YG00050, and Unit No. A-03 with Serial No. 1YG00064). Other emission points at the compressor station include: Emissions Unit EMERGEN which is a diesel-fired engine to provide the station with emergency back-up power; Emissions Unit TBATTERY comprised of eight (8) fixed roof condensate storage tanks; Emissions Unit MSS, which accounts for emissions during compressor blowdowns for maintenance, startup and shutdown as well as during pipeline pigging activities; Emissions Unit TLOAD for emissions associated with the loading of condensate from tanks into trucks; and Emissions Unit FUGVOC, which accounts for the fugitive emissions from leaking components at the station. For additional information and an analysis of all the emission units which constitute the stationary source, please see the source determination which may be found in the record for this permit renewal action.

d. Permitting and Operations History

The Lindrith Compressor Station is owned and operated by Enterprise Field Services, LLC. This is the first Part 71 (Title V) Permit renewal for the facility. The initial Title V permit (Permit No. R6FOPP71-03) for the Lindrith compressor station was issued by EPA in 2003, with an effective date of December 17, 2003. Enterprise submitted an application, dated May 12, 2008, to renew the Title V permit. In addition, by letter dated November 8, 2008, Enterprise requested a significant revision to the permit, and by letter dated May 14, 2010, Enterprise updated their application and identified operational changes at the facility. More recently, Enterprise updated their renewal application by letter dated February 14, 2014, and identified all operations at the station since the 2003 Title V permit. Additional information submitted by the applicant may be found in the record for this action. This source is required to renew its Clean Air Act Title V Permit in order to continue to operate, in accordance with Part 71 of Title 40 of the Code of Federal Regulations.

Emission Limitations: Emission limitations have been updated to reflect current emission factors and operations at the source; testing, monitoring, recordkeeping and reporting requirements have been updated as well to ensure that the Lindrith Compressor Station remains a synthetic minor source for NSR purposes. The eight condensate tanks, emissions unit TBATTERY, no longer quantify as insignificant sources due to their present emissions.

Engine Replacement: On April 10, 2007, Enterprise requested RICE Unit No. A-03 with serial number 1YG00061 be replaced with an engine from the same manufacturer, brake horsepower, and model number with serial number 1YG00072. The company demonstrated that this replacement did not trigger a construction or reconstruction under applicable rules for the following reasons: (1) The Company's records show that the actual monitoring data for the replaced engine and the new engine are the same; (2) The replacement engine is the same model and manufacturer as the original engine; and (3) The engine performs the exact same function as the one it replaced,. The Minor NSR Rule for Tribal Lands was not finalized until 2011, and this engine replacement did not require a PSD permit. Then, in February of 2014 and 2015, Enterprise characterized the exchange of Emission Units A-03, serial number 1YG00072 and A-02, serial number 1YG00054, respectively, as routine maintenance, repair and replacement, because the emission rates were identical to the replaced engines, and the replacement engines, with serial numbers 1YG00064 and 1YG00050, respectively, were identified as the same manufacturer and model engines as the replaced compressor engines.

e. Potential to Emit

Applicable PTE Guidance: Potential to emit (PTE) is defined as the maximum capacity of a stationary source to emit a pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution control equipment and restriction on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation, or the effect it would have on emissions, is federally enforceable. Potential to Emit is meant to be a worst case emissions calculation. Actual emissions may be much lower.

National EPA guidance on PTE states that air pollution control equipment (in this case, the catalytic converters for the engines designated as A-01 and A-02) can be credited as restricting PTE only if federally enforceable requirements are in place requiring the use of such air pollution control equipment. The primary applicable guidance is a memo titled, "Guidance on Limiting Potential to Emit in New Source Permitting," dated June 13, 1989, to EPA Regional Offices, from the Office of Enforcement and Compliance Assurance (OECA), and the Office of Air Quality Planning and Standards (OAQPS). A later memo to the EPA Regional Offices, dated January 25, 1995, titled "Guidance on Enforceability Requirements for Limiting Potential to Emit through SIP and Section 112 Rules and General Permits," also provides guidance on this topic.

PTE of the Lindrith Compressor Station: Table 1 below includes the potential to emit data provided by Enterprise Field Services, LLC for the significant emissions sources which comprise the stationary source; insignificant emissions sources are identified in Table 4 below. Federally enforceable requirements requiring the use of pollution control equipment on the engines designated as Unit No. A-01 and Unit No. A-02 and other operational conditions and limitations were established in EPA's PSD Permit No. NM-1644-M1, last modified on April 10, 1997. The initial Title V permit for the Lindrith Compressor Station incorporated the requirements of EPA's PSD Permit No. NM-1644-M1. The PTE listed in the initial Title V permit for non-HAP emissions was less than PSD applicability (i.e., the Lindrith Compressor Station was a synthetic minor source of regulated NSR pollutants); however, the PTE listed in the initial Title V permit for HAP emissions was greater than the threshold for a major HAP source and Title V applicability (i.e., greater than 25 tpy of total HAP emissions). The same is true for this renewed Title V permit – that is, the Lindrith Compressor Station is a synthetic minor source of regulated NSR pollutants, but it is a major HAP source. Finally, Table 2 below shows the difference between the PTE in the current Title V permit and the draft Title V permit renewal.

f. Permit Shield

In accordance with 40 CFR § 71.6 (f), Section 2 of the permit contains a permit shield related to applicable requirements specifically included in the permit. In addition, Section 2 of the permit provides a permit shield from certain conditions contained in Permit PSD-NM-1644-M1 because EPA finds that those requirements have been satisfied and are no longer ongoing applicable requirements that must be included in this Title V permit. More specifically, the notification of construction, startup, and initial testing of the engines, as required by General Conditions 1-3, have been completed, as well as the removal of the engines required by Special Condition 7 of the Permit PSD-NM-1644-M1.

Table 1: Significant Emissions Sources and Potential to Emit in Tons per Year (tpy) Enterprise Field Services, LLC - Lindrith Compressor Station

Emission Unit ID	NOx	VOC	SO_2	PM_{10}	$PM_{2.5}$	CO	Lead	HAP[1]	CO_2e
A-01, Caterpillar 3612LE (NG-fired Engine)	22.09	20.54	1.42	0.97	0.97	11.83	0	10.28	11,304
A-02, Caterpillar 3612LE (NG-fired Engine)	22.09	20.54	1.42	0.97	0.97	11.83	0	10.28	11,304
A-03, Caterpillar 3612LE (NG-fired Engine)	22.09	29.34	1.42	0.97	0.97	78.88	0	14.69	11,305
EMERGEN Caterpillar 3304 (Diesel-fired engine)	0.02	0.01	0.0001	0.002	0.002	0.03	0		5
MSS[2]		25.00						0.64	1,439
FUGVOC		3.31						0.03	80
TBATTERY		37.39						1.07	110
TLOAD		2.23						0.07	9
TOTALS tpy	66.29	138.36	4.26	2.91	2.91	102.57	0	37.06	35,556

[1] Mostly formaldehyde
[2] MSS emissions include, but are not limited to, engine starts, compressor shutdowns, vessel and piping blowdowns, pipeline pigging activities, including emissions associated with the removal of the pig from the pig receiver.

NOx - oxides of nitrogen
VOC - volatile organic compounds (non-HAP)
SO2 - sulfur dioxide
PM10 - particulate matter with a diameter 10 microns or less
CO - carbon monoxide
HAP - hazardous air pollutants (see CAA Section 112(b))
NG - natural gas

Table 2. Change in Emission Pollutant Versus Total Emissions, tons/year for Regulated Units

Pollutant	Total Emissions, tons/year Current Permit	Total Emissions, tons/year Proposed Permit	Total Emissions, tons/year Proposed Change
NOx	68.48	66.29	-2.19
SO_2	0.22	4.26	4.04
CO	95.5	102.57	7.07
PM_{10}	NA	2.91	2.91
$PM_{2.5}$	NA	2.91	2.91
VOC	153.3	138.36	-14.94
Lead	NA	Neg.	Neg.
HAPs	55	37.06	-17.94

f. Emission Units and Emission Generating Activities

Table 3 below describes the significant emission units located at the Lindrith Compressor Station, based upon information submitted by Enterprise Field Services, LLC in their application to renew the Title V permit. Insignificant emission units at the source are identified in Table 4 below.

Table 3. Significant Emission Units and Control Devices

Emission Unit No.	Unit Description	Control Equipment
A-01	IC Engine (4SLB) Manufacturer - Caterpillar, Model 3612LE Installed – April 17, 1995 H.P. Rating - 3,267 Maximum design heat input – 22.09 MMBTU/hr Fuel type - Natural gas Primary use - Compressor drive Serial Number – 1YG00055	Catalytic Converter
Control Equipment for A-01	Device Type - Catalytic Oxidation System Manufacturer – Houston Industrial Silencing Installation date: April 17, 1995 Model – DeCOHx33c22/24PL Serial Number - unknown Pollutants Controlled / Control efficiency: CO - 85%, VOC - 30%	N/A
A-02	IC Engine (4SLB) Manufacturer - Caterpillar, Model 3612LE Installed – May 1, 1995 H.P. Rating - 3,267 Maximum design heat input – 22.09 MMBTU/hr Fuel type - Natural gas Primary use - Compressor drive Serial Number – 1YG00050	Catalytic Converter
Control Equipment for A-02	Device Type - Catalytic Oxidation System Manufacturer – Houston Industrial Silencing Installation date: April 17, 1995 Model – DeCOHx33c22/24PL Serial Number - unknown Pollutants Controlled / Control efficiency: CO - 85%, VOC - 30%	N/A
A-03	IC Engine (4SLB) Manufacturer - Caterpillar, Model 3612LE Installed March May 15, 1995 H.P. Rating - 3,267 Maximum design heat input –22.09 MMBTU/hr Fuel type - Natural gas Primary use - Compressor drive Serial Number – 1YG00064	No add-on controls required in underlying NSR permit and initial Part 71 permit

Table 3. Significant Emission Units and Control Devices

Emission Unit No.	Unit Description	Control Equipment
A-01	IC Engine (4SLB) Manufacturer - Caterpillar, Model 3612LE Installed – April 17, 1995 H.P. Rating - 3,267 Maximum design heat input – 22.09 MMBTU/hr Fuel type - Natural gas Primary use - Compressor drive Serial Number – 1YG00055	Catalytic Converter
Control Equipment for A-01	Device Type - Catalytic Oxidation System Manufacturer – Houston Industrial Silencing Installation date: April 17, 1995 Model – DeCOHx33c22/24PL Serial Number - unknown Pollutants Controlled / Control efficiency: CO - 85%, VOC - 30%	N/A
A-02	IC Engine (4SLB) Manufacturer - Caterpillar, Model 3612LE Installed – May 1, 1995 H.P. Rating - 3,267 Maximum design heat input – 22.09 MMBTU/hr Fuel type - Natural gas Primary use - Compressor drive Serial Number – 1YG00050	Catalytic Converter
Control Equipment for A-02	Device Type - Catalytic Oxidation System Manufacturer – Houston Industrial Silencing Installation date: April 17, 1995 Model – DeCOHx33c22/24PL Serial Number - unknown Pollutants Controlled / Control efficiency: CO - 85%, VOC - 30%	N/A
A-03	IC Engine (4SLB) Manufacturer - Caterpillar, Model 3612LE Installed March May 15, 1995 H.P. Rating - 3,267 Maximum design heat input –22.09 MMBTU/hr Fuel type - Natural gas Primary use - Compressor drive Serial Number – 1YG00064	No add-on controls required in underlying NSR permit and initial Part 71 permit

Emission Unit No.	Unit Description	Control Equipment
EMERGEN	Emergency Generator (CI) Manufacturer – Caterpillar Model 3304 Installed May 1, 1995 H.P. Rating – 192 Maximum design heat input - 1.30 MMBTU/hr Fuel type – Diesel Fuel Primary use – Emergency electrical generation Serial Number – 83Z09381	
T-1	454 bbl. Condensate Storage Tank	
T-2	454 bbl. Condensate Storage Tank	
T-3	454 bbl. Condensate Storage Tank	
T-4	454 bbl. Condensate Storage Tank	
T-5	454 bbl. Condensate Storage Tank	
T-6	454 bbl. Condensate Storage Tank	
T-7	454 bbl. Condensate Storage Tank	
T-8	454 bbl. Condensate Storage Tank	

Part 71 allows sources to separately list (in the permit application) units or activities that qualify as "insignificant" based on potential emissions below 2 tpy for all regulated pollutants that are not listed as HAPs under Section 112(b) and below 1000 pounds/year or the de minimus level established under Section 112(g), whichever is lower, for HAPs. Units that qualify as "insignificant" for the purposes of the Part 71 application are in no way exempt from applicable requirements or any requirements of the Part 71 permit. According to the information submitted by the permittee, the following emission units are insignificant based on their calculated emission rates:

Table 4. Insignificant Emission Units

Number	Unit Description	Size	Exemptions to Federal Requirements
T-9	Compressor Skid Sump Drain Tank	120 bbl	< 2 tpy 40 CFR § 71.5(c)(11)(ii)
T-10	Water Separation Tank	120 bbl	< 2 tpy 40 CFR § 71.5(c)(11)(ii)
T-11	Water Separation Tank	120 bbl	< 2 tpy 40 CFR § 71.5(c)(11)(ii)
T-12	Water Separation Tank	120 bbl	< 2 tpy 40 CFR § 71.5(c)(11)(ii)
T-13	Lube Oil Tank	500 gal	< 2 tpy 40 CFR § 71.5(c)(11)(ii)
T-14	Lube Oil Tank	500 gal	< 2 tpy 40 CFR § 71.5(c)(11)(ii)
T-15	Lube Oil Tank	500 gal	< 2 tpy 40 CFR § 71.5(c)(11)(ii)
T-16	Ambitrol (AntiFreeze) Tank	500 gal	< 2 tpy 40 CFR § 71.5(c)(11)(ii)
T-17	Ambitrol (AntiFreeze) Tank	500 gal	< 2 tpy 40 CFR § 71.5(c)(11)(ii)
T-18	Ambitrol (AntiFreeze) Tank	500 gal	< 2 tpy 40 CFR § 71.5(c)(11)(ii)

5. Applicable Requirements and Other Conditions:

a. In its February 14, 2014 update to its Part 71 permit renewal application, Enterprise Field Services, LLC (Enterprise) addresses the applicable requirements related to the operations of the Lindrith Compressor Station. Enterprise notes that Emissions Unit Nos. A-01, A-02, and A-03 as well as EMERGEN are existing stationary RICE subject to the requirements of 40 CFR Part 63, Subpart ZZZZ. Based on Enterprise's representation that Emission Unit Nos. A-01, A-02, and A-03 are

existing spark ignition four stroke lean burn (4SLB) stationary RICE, each with a site rating of >500 brake HP located at a major source of HAP emissions, the requirements of 40 CFR Part 63, Subpart ZZZZ and Subpart A (including the initial notification requirements) do not apply. See 40 CFR § 63.6590(b)(3)(ii). However, EMERGEN, is an existing compression ignition (CI) stationary emergency RICE with a site rating of 192 brake HP located at a major source of HAP emissions, and, therefore, subject to the requirements of Subpart ZZZZ and certain requirements of Subpart A. See 40 CFR §§ 63.6590(a)(1) and 63.6645(a)(5) (exempting existing stationary emergency RICE from certain Subpart A notification requirements).

In addition, Emission Unit Nos. A-01, A-02 and A-03 are subject to the requirements of PSD-NM-1644-M1, dated April 10, 1997, and incorporated into the initial Part 71 permit issued for the Lindrith Compressor Station. Emission limitations set forth in those permits for NOx, CO, VOC, and SO2 established Lindrith as a synthetic minor source for NSR purposes. EPA believes that the incorporation of those requirements into the initial Part 71 permit, issued on November 17, 2003, establishes Lindrith Compressor Station as an existing "synthetic minor source," within the meaning of that term under 40 CFR § 49.152. Pursuant to 40 CFR § 49.158(c)(2)(i), EPA is electing to allow Lindrith Compressor Station to maintain the synthetic minor status in the renewed Part 71 permit. Monitoring, recordkeeping, and recording requirements are included in the permit to ensure that the synthetic minor source status is maintained. Since the remaining emission units, including MSS, TBATTERY, FUGVOC, and TLOAD, are not currently subject to any other applicable requirements, EPA feels that it is necessary to require Enterprise to track and report emissions associated with those units in order for the source to maintain its synthetic minor NSR source status.

Based on information submitted by Enterprise, there are no performance standards promulgated under 40 CFR Part 60 that are currently applicable to emission units at the Lindrith Compressor Station, and the requirements of the New Mexico State Implementation Plan (SIP) do not apply to this source, as it is located within the exterior boundaries of the Jicarilla Apache Reservation. The emissions limitations in this Title V permit reflect conditions imposed by the initial Title V and PSD permits, as well as updates to emissions calculations and source operations. Emissions from the facility will be calculated from recorded parameters in the permit and tracked through annually submitted Fee Schedules (which include annual reports on criteria pollutant and hazardous air pollutant (HAP) actual emissions) and compliance certifications, to ensure that future changes to the source do not trigger additional federal CAA requirements.

The source will continue to comply with all applicable requirements. For applicable requirements that will become effective during the term of the permit, the source will meet such requirements on a timely basis. In particular, the permittee will comply with the following:

Table 5: Applicable Regulations: Enterprise Field Services, LLC Lindrith Compressor Station

Citation	Requirement	Comment
40 CFR 71	Federal Operating Permits Program	All Emission Units (See Table 1)
40 CFR 63, Subpart A	General Provisions	Unit No. EMERGEN
40 CFR 63, Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary RICE	Unit No. EMERGEN
PSD-NM-1644-M1 (40 CFR 52.21)	General and Specific Conditions of PSD-NM-1644-M1, as noted in Condition 3.2.1 of the draft Title V permit	Unit Nos. A-01, A-02, and A-03

As discussed above, Emission Unit Nos. A-01, A-02, and A-03 are subject to the requirements of PSD-NM-1644-M1 as incorporated and made federally enforceable in the initial Part 71 permit for the Lindrith Compressor Station.

In addition to the tpy emission limitations for NOx, CO, VOC, and SO2 as reflected in Table 1 above for those emission units, Table 6 below provides the short term emission limits from the PSD and initial Part 71 permits that are also considered applicable requirements and, therefore, are included in the draft Part 71 permit renewal:

Table 6: Maximum Allowable Emissions Rates – Enterprise Field Services, LLC; Lindrith Compressor Station (Reference: Permit PSD-NM-1644-M1 – El Paso Field Services – Lindrith Compressor Station: April 10, 1997, as reflected by current emissions factors and data).

Unit ID	% Load	NO_x		CO		VOC	
		g/hp-hr	lb/hr	g/hp-hr	lb/hr	g/hp-hr	lb/hr
A-01	100	0.70	5.04	0.38	2.70	0.65	4.69
A-02	100	0.70	5.04	0.38	2.70	0.65	4.69
A-03	100	0.70	5.04	2.50	18.01	0.93	6.70

b. Since the glycol dehydrator has been removed from the source, certain non-applicable conditions that existed in Permit No R6FOPP71-03 will not be carried over into the Title V renewal. These include:

(1) Compliance Assurance Monitoring, which had been required for the glycol dehydrator; and

(2) 40 CFR Part 63 Subpart HH, National Emission Standards for HAPs from Oil and Natural Gas Production Facilities, which was required for the glycol dehydrator.

c. As a major source of HAPs, the source meets the applicability requirements of the emission standards of 40 CFR Part 63, Subpart HH - National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities, but, Subpart HH no longer applies because, as stated above, the glycol dehydrator was removed and the condensate tank throughput is below the applicable threshold.

d. Other Potentially Applicable Requirements

Based on the information provided in Enterprise's application and subsequent updates, EPA does not believe that the Lindrith Compressor Station is subject to the acid rain program under Title IV of the CAA or the requirements of Title VI related to CFCs.

e. General Permit Conditions

In order to ensure that the Lindrith Compressor Station is operating properly and maintaining its current status as a minor synthetic source for NSR purposes, the following general permit conditions will be placed into the Part 71 permit:

1. Fuel Usage Rates: The fuel type used at this facility is natural gas which is used in Unit Nos. A-01, A-02 and A-03. The maximum annual usage rates stated in the application for these emissions units are 213.83 MMscf for emissions units A-01, A-02, and A-03. Based on this information, the combined total amount of natural gas burned at this facility shall not exceed 641.49 MMscf per year. Monitoring, recordkeeping, and reporting requirements have been placed in the permit for this requirement.

2. Heat Input: The maximum design heat input for each internal combustion engine is 22.09 MMBtu/hr based on the information presented in the application. Therefore, the actual (average) heat input shall not exceed the maximum design heat input for each of the internal combustion engines (Unit Nos. A-01, A-02, and A-03 shall not exceed 22.09 MMBtu/hr). Monitoring, recordkeeping, and reporting requirements have been placed in the permit for this requirement.

3. Fuel Usage: Fuel fired in the IC engines (Units No. A-01, A-02, and A-03) is limited to sweet natural gas of pipeline quality containing a maximum 0.8 % sulfur by weight, and the diesel fired in IC Engine (EMERGEN) shall be limited to a sulfur content of 15 ppm maximum.

4. Testing: The provisions of the initial Part 71 permit which incorporated the requirements of PSD-NM-1644-M1, will be contained in the draft Part 71 permit renewal in order to ensure that those applicable requirements are met and to ensure the source maintains its status as a synthetic minor source for NSR purposes.

5. General Monitoring and Recordkeeping:

   a. The facility will be required to keep all records for five (5) years, including the following: serial number for each emission unit, records of repair and maintenance activities which will include identification of emission units and the work involved, fuel supplier, fuel supply, and fuel quality.

b. In addition to recordkeeping requirements, the results of all stack tests and the results of all fuel sampling will be maintained in a file by the holder of this permit for a period of 5 years.

c. The Company will continue to be required to monitor the heat input rate of all the engines for verification purposes toward the permitted emission levels. Monitoring of heat input rate of each engine will occur once per month, with calculations of compliance with a twelve (12) month rolling average. The Company will be required to operate all equipment in accordance with manufacturer's design values for that equipment.

d. Monthly and annual 12-month rolling average recordkeeping of the fuel flow/consumption of the IC engines is required.

6. General Reporting:

An annual report will be submitted to the EPA Region 6 office by the permittee. The report will contain the following:

(1) Hours of operation of the facility;
(2) The calculated annual emissions for the pollutants listed in Table 1 above;
(3) The monthly and annual 12-month rolling average of the fuel flow/consumption of the three IC compressor engines and condensate throughput volumes for TBATTERY;
(4) The monthly and annual 12-month rolling average of the actual heat input rate for the three IC compressor engines;
(5) A summary of the periods of noncompliance.

The report will be submitted to the EPA Region 6 office by April 1 for the previous calendar year's emissions.

7. EMERGEN – Monitoring, Recordkeeping, and Reporting Requirements

EMERGEN is an existing emergency stationary RICE with a 192 brake HP rating. As such, it is subject to the specific monitoring, recordkeeping, and reporting requirements required by 40 CFR Part 63, Subpart ZZZZ. These requirements have been placed in Section 4 of the draft Part 71. In addition, in order to qualify as an emergency stationary RICE, the operational requirements of 40 CFR § 63.6640(f) have been placed into

section 4 of the draft Part 71 permit.

8. TLOAD, TBATTERY, and FUGVOC – Monitoring, Recordkeeping and Reporting (MRR) Requirements

Appropriate MRR requirements have been placed into the draft Part 71 permit to ensure that the PTE numbers in Table 1 are being met. These requirements may be found at Condition 3.2 in the draft Part 71 permit. Additionally, there is a requirement (*see* Condition 1.2.2 of the draft Part 71 permit) that the permittee calculate its PTE annually and report those calculations and any deviations from the PTE in Table 1 to EPA.

6. Fee Schedule and Annual Compliance Reports

The Company has provided the Region with annual estimates of actual emissions for all regulated pollutants for fee payment purposes and annual compliance reports for the current Part 71 permit. The Company must continue to submit annual estimates of actual emissions for all regulated pollutants as part of the requirement to pay an annual fee (see Section 5.1 of the permit), and annual compliance certifications and reports (see Section 5.3 of the permit). The EPA has reviewed the submittals for fee schedules for the years 2002, 2003, 2004, 2005, 2006, 2007 and 2013, and compliance reports for years 2004-2006 and 2013-2014.

7. Credible Evidence

Language is placed in the permit which states that credible evidence may be used to demonstrate whether a source would have been in compliance with applicable requirements of the permit, if the appropriate performance or compliance test, using specific methods or procedure to assess compliance, had been performed for purposes of Title V compliance certifications. Also, nothing in the permit will preclude the use, including exclusive use, of credible evidence or information by any person for purposes of establishing whether or not a source is in violation of permit conditions.

8. Notice and Comment

a. Public Notice.

As described in 40 CFR § 71.11(a)(5), all part 71 draft operating permits will be publicly noticed and made available for public comment. The Public Notice of

permit actions and public comment period is described in 40 CFR § 71.11(d).

There will be a 30 day public comment period for actions pertaining to a draft permit. Public notice has been given for this draft permit by mailing a copy of the notice to the permit applicant, the affected State, tribal and local air pollution control agencies, the city and county executives, the State and Federal land managers and the local emergency planning authorities which have jurisdiction over the area where the source is located. A copy of the notice has also been provided to all persons who have submitted a written request to be included on the mailing list. If you would like to be added to our mailing list to be informed of future actions on these or other CAA permits issued in Indian Country, please send your name and address to Randy Pitre at the address listed below:

Air Permits Section
EPA, Region 6
1445 Ross Avenue (6PD-R)
Dallas, TX 75202
E-mail: pitre.randy@epa.gov

Public notice has also been published in a newspaper of general circulation in the area affected by this source.

b. Opportunity for Comment

Members of the public may review a copy of the draft permit prepared by EPA, the application, this statement of basis for the draft permit, and all supporting materials for the draft permit. Copies of these documents are available at:

Jicarilla Apache Reservation
Library
P.O. Box 507
Dulce, NM 87528
Phone #: (505) 759-3242

U.S. EPA, Region 6
Library
1445 Ross Ave.
Dallas, TX 75202-2733
Phone #: (214) 665-7122
or (214) 665-6435

Copies of the draft permit and this statement of basis are also available electronically on the EPA Region 6 Website,

http://yosemite.epa.gov/r6/Apermit.nsf/Part71

Any interested person may submit written comments on the draft Part 71 operating permit during the public comment period to Randy Pitre at the address listed in section 7.a above. All comments will be considered and answered by EPA in making the final decision on the permit. The EPA will keep a record of the commenters and of the issues raised during the public participation process.

Anyone, including the applicant, who believes any condition of the draft permit is inappropriate must raise all reasonable ascertainable issues and submit all arguments supporting their position by the close of the public comment period. Any supporting materials submitted must be included in full and may not be incorporated by reference, unless the material has been already submitted as part of the administrative record in the same proceeding or consists of State or Federal statutes and regulations, EPA documents of general applicability, or other generally available reference material.

c. Opportunity to Request a Hearing

A person may submit a written request for a public hearing to Randy Pitre, at the address listed in Section 7.a above, by stating the nature of the issues to be raised at the public hearing. Based on the number of hearing requests received, EPA will hold a public hearing whenever it finds there is a significant degree of public interest in a draft operating permit. The EPA will provide public notice of the public hearing. If a public hearing is held, any person may submit oral or written statements and data concerning the draft permit.

Document No. 18

FEDERAL CLEAN AIR ACT TITLE V OPERATING PERMIT

FOR

ENTERPRISE FIELD SERVICES, LLC

LINDRITH COMPRESSOR STATION
LINDRITH, RIO ARRIBA COUNTY, NEW MEXICO

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

FEDERAL CLEAN AIR ACT TITLE V OPERATING PERMIT

Issue Date:	--/--/----	Permit Number: R6NM-03-R1
Effective Date:	--/--/----	Replaces Permit Number: R6FOPP71-03
Expiration Date:	--/--/----	

In accordance with the provisions of Title V of the Clean Air Act and 40 CFR Part 71 and applicable rules and regulations,

Enterprise Field Services, LLC
Lindrith Compressor Station
Lindrith, Rio Arriba County, New Mexico

is authorized to operate air emission units and to conduct other air pollutant emitting activities in accordance with the permit conditions listed in this permit.

This source is authorized to operate in the following location(s):

20 miles west of Lindrith, New Mexico in Rio Arriba County,
UTM Zone 13; UTM H 285.22; UTM V 4020.98
Jicarillo Apache Reservation in New Mexico

Terms not otherwise defined in this permit have the meaning assigned to them in the referenced regulations. All terms and conditions of the permit are enforceable by the Environmental Protection Agency (EPA) and citizens under the Clean Air Act.

Any control measure and/or equipment not properly installed, operated, and maintained will be considered a violation of this permit.

The permit number cited above should be referenced in future correspondence regarding this facility.

Wren Stenger
Director
Multimedia Planning and Permitting Division
United States Environmental Protection Agency

Date

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Terms, Abbreviations and Acronyms

Source	Enterprise Field Services, LLC; Lindrith Compressor Station
Facility	Enterprise Field Services, LLC; Lindrith Compressor Station
CAA	Clean Air Act [42 United States Code Section 7401 et seq.]
CFR	Code of Federal Regulations
HAP	Hazardous Air Pollutant
hr	hour
ID. No.	Identification Number
MMBtu	Million British Thermal Units
mmscf/yr	Million Standard Cubic Feet per year
NOx	Nitrogen Oxides
PM10	Particulate matter less than 10 microns in diameter
SO_2	Sulfur Dioxide
EPA	United States Environmental Protection Agency
VOC	Volatile Organic Compounds
IC engine	internal combustion engine – formerly referred to as reciprocating engine
RICE	reciprocating internal combustion engine
SIC	Standard Industrial Classification

List of Tables

1. Source Identification and Unit Specific Information

1.1. General Source Information

Owner and Operator:	Enterprise Field Services, LLC 1100 Louisiana Street Houston, Texas 77002-5227
Plant Name:	Lindrith Compressor Station
Plant location:	20 miles west of Lindrith, New Mexico
EPA Region:	6
State:	New Mexico
Tribe:	Jicarilla Apache
County:	Rio Arriba
Reservation:	Jicarilla Apache Reservation
Plant mailing address:	P. O. Box 4324 Houston, Texas 77210-4324
Responsible Official:	Graham Bacon Group Senior Vice President - Operations Enterprise Field Services, LLC P.O. Box 4324 Houston, Texas 77210-4324 Phone: (713) 880-6595
Plant Contact:	Jim Lieb Senior Environmental Engineer Enterprise Field Services, LLC c/o Environmental Department P.O. Box 4324 Houston, Texas 77210-4324 Phone: (505) 599-2159

Standard Industrial Classification (SIC) Code: 1311

Aerometric Information Retrieval System (AIRS)
Facility System Plant ID. No.: R6NM-03-R1 (replaces R6FOPP71-03)

Description of Process: The Lindrith Compressor Station, owned and operated by Enterprise Field Services, LLC (Enterprise), with SIC code 1311, is a natural gas compression and transmission facility with pressurized natural gas as its principal product.

1.2. Source Emission Points and Potential to Emit

Table 1 below lists the significant emission units at the Lindrith Compressor Station. These include the three RICE units (Unit Nos. A-01, A-02, and A-03), the emergency RICE generator (EMERGEN), MSS (engine starts, compressor shutdowns, vessel and piping blowdowns and pipeline pigging activities, including the pipeline pigging location), FUGVOC (fugitive emissions from leaking components), TBATTERY (emissions from the eight 454-bbl fixed roof storage tanks used for the collection of natural gas condensates and produced water), and TLOAD (emissions from the condensate truck loading). Table 1 below also reflects the potential to emit for each of the listed emissions sources.

Table 1: Significant Emission Sources and Potential to Emit in Tons per Year (tpy)
Enterprise Field Services, LLC - Lindrith Compressor Station

Emission Unit ID	NOx	VOC	SO_2	PM_{10}	$PM_{2.5}$	CO	Lead	HAP[1]	CO_2e
A-01, Caterpillar 3612LE (NG-fired Engine)	22.09	20.54	1.42	0.97	0.97	11.83	0	10.28	11,304
A-02, Caterpillar 3612LE (NG-fired Engine)	22.09	20.54	1.42	0.97	0.97	11.83	0	10.28	11,304
A-03, Caterpillar 3612LE (NG-fired Engine)	22.09	29.34	1.42	0.97	0.97	78.88	0	14.69	11,305
EMERGEN Caterpillar 3304 (Diesel-fired engine)[2]	0.02	0.01	0.0001	0.002	0.002	0.03	0		5
MSS[3]		25.00						0.64	1,439
FUGVOC		3.31						0.03	80
TBATTERY		37.39						1.07	1
TLOAD		2.23						0.07	9
TOTALS tpy	66.29	138.36	4.26	2.91	2.91	102.57	0	37.06	35,556

[1] Mostly formaldehyde
[2]The emission calculations for EMERGEN are based on 52 hrs/yr for maintenance/testing purposes.
[3] MSS emissions include, but are not limited to, engine starts, compressor shutdowns, vessel and piping blowdowns, pipeline pigging activities, including opening the pigging receiver to remove the pig.

NOx - oxides of nitrogen
VOC - volatile organic compounds (non-HAP)
SO2 - sulfur dioxide
PM10 - particulate matter with a diameter 10 microns or less
CO - carbon monoxide
HAP - hazardous air pollutants (see CAA Section 112(b))
NG - natural gas

1.2.1 Emission Limitations for the RICE Units

For Emissions Unit Nos. A-01, A-02, and A-03, the permitee must meet the tons per year (tpy) emission values for NO_x, VOC, CO, and SO_2 listed in Table 1 above. Table 2 below provides additional information about the RICE units at the Lindrith Compressor Station, and Table 2.1 sets forth the federally enforceable short term emission limitations for Emission Unit Nos. A-01, A-02, and A-03. The limitations in Table 2.1 are carried forth from PSD-NM-1644-M1 and the initial Title V permit, which established the Lindrith Compressor Station as a synthetic minor source for

NSR purposes. EMERGEN is subject to the limitations associated with an emergency stationary RICE as set forth in 40 CFR § 63.6640(f) and the limitations and operational requirements set forth in 40 CFR § 63.6602 and Table 2c of 40 CFR Part 63, Subpart ZZZZ. See Section 4 below.

Table 2: Source Emission Points and Control Devices for RICE Units Enterprise Field Services, LLC; Lindrith Compressor Station

Unit No.	Type of Unit Serial No.	Manufacturer Model No. Design Heat Input	Operating Range or Size of Unit	Date of Installation	Primary Use	Control Equipment
A-01[1]	I/C Engine 1YG00055	Caterpillar 3612LE 22.09 MMBtu/hr	3,267 HP	4/17/1995	Compressor drive	Catalytic Oxidation
A-02[1]	I/C Engine 1YG00050	Caterpillar 3612LE 22.09 MMBtu/hr	3,267 HP	5/1/1995	Compressor drive	Catalytic Oxidation
A-03[1]	I/C Engine 1YG00064	Caterpillar 3612LE 22.09 MMBtu/hr	3,267 HP	5/15/1995	Compressor drive	No add-on controls required in underlying NSR permit and initial Part 71 permit
EMERGEN[2]	I/C Engine 83Z09381	Caterpillar 3304 1.30 MMBtu/hr	192 HP	5/1/1995	Generator	None

[1] Fuel type – Natural gas with restriction – maximum of 0.25 grains of Hydrogen Sulfide / 100 standard cubic feet (scf).
[2] The diesel fuel used in the emergency generator is limited to 15 ppm Sulfur content [40 CFR § 80.510(b)].

Table 2.1: Maximum Allowable Emissions Rates – Enterprise Field Services, LLC; Lindrith Compressor Station (Reference: Permit PSD-NM-1644-M1 – El Paso Field Services – Lindrith Compressor Station: April 10, 1997, as modified with current emissions factors and data).

Unit ID	% Load	NO_x		CO		VOC	
		g/hp-hr	lb/hr	g/hp-hr	lb/hr	g/hp-hr	lb/hr
A-01	100	0.70	5.04	0.38	2.70	0.65	4.69
A-02	100	0.70	5.04	0.38	2.70	0.65	4.69
A-03	100	0.70	5.04	2.50	18.01	0.93	6.70

1.2.2 Emissions Limitations and Operational Requirements for Other Emissions Units

In order to ensure that the Lindrith Compressor Station maintains its status as a minor stationary source for NSR purposes, the permitee shall operate all emissions units in accordance with representations provided in the Title V permit application. Also, in accordance with Condition 5.3., permitee shall calculate the total emissions in tons per year for each pollutant listed in Table 1 for all emissions units at the Lindrith Compressor Station and report any amount above the values listed in Table 1 as deviations of this permit.

2. Permit Shield [40 CFR § 71.6(f)]

2.1. Nothing in this permit shall alter or affect the following:

2.1.1. The provisions of Section 303 of the CAA (emergency orders), including the authority of the Administrator under that section.

2.1.2. The liability of a permittee for any violation of applicable requirements prior to or at the time of permit issuance; or

2.1.3. The ability of the EPA to obtain information from a source under Section 114 of the CAA.

2.2. General Conditions 1, 2 and 3 and Special Provision 7 of PSD-NM-1644-M1 have been satisfied and are no longer ongoing applicable requirements requiring incorporation into this permit.

2.3. Compliance with the terms and conditions of this permit shall be deemed in compliance with the applicable requirements specifically listed in this permit as of the date of permit issuance.

3. Applicable Requirements and General Permit Conditions

3.1. Applicable Requirements

The source shall continue to comply with all applicable requirements. For applicable requirements that will become effective during the term of the permit, the source shall meet such requirements on a timely basis. In particular, the permittee shall comply with the following:

Table 3: Applicable Requirements for Enterprise Field Services LLC, Lindrith Compressor Station

Citation	Requirement	Comment
40 CFR 71	Federal Operating Permits Program	All Emission Units (See Table 1)
40 CFR 63, Subpart A	General Provisions	Unit No. EMERGEN
40 CFR 63, Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary RICE	Unit No. EMERGEN
PSD-NM-1644-M1 (40 CFR 52.21)	General and Specific Conditions of PSD-NM-1644-M1, as noted below in Condition 3.2.1 of this Title V permit	Unit Nos. A-01, A-02, and A-03

The Enterprise Field Services, LLC, Lindrith Compressor Station application was reviewed for compliance with the Part 71 Operating Permits Program. Based on the information provided by Enterprise Field Service, LLC in their application, the Lindrith Compressor Station is also subject to the following general permit requirements:

3.2. General Permit Conditions

Conditions in this section apply to all emissions units located at the facility, including any units not specifically listed in Table 1:

3.2.1. Permittee is subject to the conditions and requirements of PSD-NM-1644-M1, specifically, General Conditions 4 through 10, and Special Conditions 1 through 6, 8, and 9 (as reflected by Tables 1 and 2.1 of this permit). Pollution control equipment installed at this facility shall be maintained and tested as specified in Permit PSD-NM-1644-M1.

3.2.2. The amount of natural gas burned in the following emission units shall not exceed the following amounts on a rolling 12-month average:

Unit No. A-01 – 213.83 MMscf/yr of natural gas
Unit No. A-02 – 213.83 MMscf/yr of natural gas
Unit No. A-03 – 213.83 MMscf/yr of natural gas

3.2.3. Condensate throughput at the TBATTERY source shall not exceed 20,000 bbls on an annual basis, as calculated on a 12-month rolling average.

3.2.4. Compliance Tests: Compliance tests from units at this source will be conducted, using applicable EPA Methods established within 40 CFR Part 51, Appendix M, or as otherwise specified by applicable requirements.

3.2.5. Monitoring

3.2.5.1. Fuel consumption for Unit Nos. A-01, A-02, and A-03, shall be monitored monthly for each unit, in MMscf (of natural gas).

3.2.5.2. Heat input rate for Unit Nos. A-01, A-02, and A-03 shall be monitored monthly on a per unit basis for individual highest rate in MMBtu/hr.

3.2.5.3. Condensate throughput at the TBATTERY source shall be monitored monthly in barrels (one barrel equals forty-two (42) U.S. Gallons).

3.2.5.4 Condensate throughput at the TLOAD source shall be monitored monthly in barrels of total volume transferred.

3.2.6. Reporting/Recordkeeping

3.2.6.1. The permittee shall keep records on all startup, shutdown, maintenance and repair activities performed on all emission units. These records shall identify the relevant emission unit, describe any work performed, and calculate any associated emissions.

3.2.6.2. The fuel flow/consumption for each emissions unit (Unit Nos. A-01, A-02, A-03) shall be recorded on a monthly basis.

3.2.6.3. The records of fuel consumption shall be maintained for each emission unit (Unit Nos. A-01, A-02, and A-03), for the last five years.

3.2.6.4. The records of heat input shall be maintained for emission Unit Nos. A-01, A-02, and A-03 for at least the last five years.

3.2.6.5. The volumes of condensate throughput at the TBATTERY source shall be measured and recorded on a monthly basis.

3.2.6.6. The volume of condensate throughput at the TLOAD source shall be recorded on a monthly basis.

3.2.6.7. The number of pipeline pigging events to the pipeline pig receiver for MSS emissions documented daily and totaled on a monthly basis.

3.2.7. The permittee shall keep records of the serial numbers for each emission unit listed herein. The emission units and their serial numbers are: A-01 with serial number 1YG00055; A-02 with serial number 1YG00050; A-03 with serial number 1YG00064; and EMERGEN with a serial number 83Z09381. A change in serial number should also be reflected in the report required by Condition 3.2.9 below.

3.2.8. Retention of these records and supporting information shall be for a period of at least five years from the date of measurement, or report. Supporting information includes all calibration and maintenance records, all original strip-chart recordings or monitoring instrumentation, and copies of all reports required by this permit.

3.2.9. The permittee shall submit to the EPA reports of any monitoring and recordkeeping required under this permit semi-annually by April 1 and October 1 of each year. The report due on April 1 shall cover the prior six–month period from September 1 through the end of February. The report due on October 1 shall cover the prior six–month period from March 1 through the end of August.

Copies of these reports shall also be sent to:

Environmental Director
Jicarilla Apache Nation
P.O. Box 507
Dulce, NM 87528

4. Engine NESHAP Requirements for EMERGEN

4.1 General Provisions

The permittee shall comply with the requirements from the NESHAP General Provisions, 40 CFR Part 63, Subpart A, for Unit No. EMERGEN only.

4.2. Requirements for EMERGEN

4.2.1. For Emissions Unit EMERGEN, the permittee shall meet the requirements in 4.2.2 through 4.2.4 below.

4.2.2. Change oil and filter every 500 hours of operation or annually, whichever comes first; inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary [40 CFR § 63.6002, Table 2c]; and

4.2.3. Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply [40 CFR § 63.6002, Table 2c].

4.2.4. Permittee must install a non-resettable hour meter, if one is not already installed. [40 CFR § 63.6625(f)]

4.3 General Compliance Requirements for EMERGEN

4.3.1. Emissions Unit No. EMERGEN must be in compliance with the operating limitations and requirements in Condition 4.2 at all times [40 CFR § 63.6605(a)].

4.3.2. The permittee must operate and maintain EMERGEN, including air pollution control and monitoring equipment, in a manner consistent with good air pollution control practices for minimizing emissions [40 CFR § 63.6605(b)].

4.4. Performance Requirements for EMERGEN

4.4.1 As an emergency stationary RICE, the permittee must operate EMERGEN according to the requirements of 40 CFR § 63.6640(f).

4.4.2 Any operation other than emergency operation, maintenance and testing emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs f(1) through (4) of 40 CFR § 63.6640, is prohibited [40 CFR § 63.6640(f)].

4.4.3 If EMERGEN is not operated according to the requirements in 40 CFR § 63.6640(f)(1) through (f)(4), EMERGEN will not be considered an emergency stationary RICE and it must meet all requirements for non-emergency engines [40 CFR § 63.6640(f)].

4.4.4 There is no time limit on the use of emergency stationary RICE in emergency situations [40 CFR § 63.6640(f)(2)].

4.4.5 Permittee may operate EMERGEN for any combination of the purposes specified in 40 CFR § 63.6640(f)(2)(i) through (iii) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs 40 CFR § 63.6640(f)(3) and (4) counts as part of the 100 hours per calendar year allowed by this paragraph [40 CFR § 63.6640 (f)(2)].

4.4.6 EMERGEN may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine [40 CFR § 63.6640(f)(2)(i)].

4.4.7 EMERGEN may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency [40 CFR § 63.6640(f)(2)(iii)].

4.4.8 EMERGEN may be operated for up to 50 hours per calendar year in non-emergency situations [40 CFR § 63.6640(f)(3)].

4.4.8.1 The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in 40 CFR § 63.6640(f)(2).

4.4.8.2 The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power as part of a financial arrangement with another entity.

4.5 Continuous Compliance Requirements for EMERGEN

EMERGEN shall be operated and maintained according to the manufacturer's emission-related operation and maintenance instructions. In the alternative, permittee may develop and follow its own maintenance plan which must provide to the extent practicable for the maintenance and operation of EMERGEN in a manner consistent with good air pollution control practice for minimizing emissions[40 CFR § 63.6640(a), Table 6].

4.6 Recordkeeping Requirements for EMERGEN

4.6.1. You must keep a copy of each notification and report that you submitted to comply with 40 CFR Part 63, Subpart ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in 40 CFR § 63.10(b)(2)(xiv).

4.6.2. Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.

4.6.3. Records of all required maintenance performed on the air pollution control and monitoring equipment.

4.6.4. The permittee must keep records of the operating and maintenance conducted on EMERGEN necessary to ensure compliance with Condition 4.5 above.

4.7 Reporting Requirements for EMERGEN

4.7.1. Permittee must report each instance in which an applicable emissions limitation, operating limitation or requirement in 40 CFR Part 63, Subpart ZZZZ, Table 2(c) is not met.

4.7.2. These instances are deviations from the emission and operating limitations in 40 CFR Part 63, Subpart ZZZZ. These deviations must be reported according to the requirements in 40 CFR § 63.6650.

5. Title V Administrative Requirements

5.1. Annual Fee Payment [40 CFR §§ 71.6(a)(7) and 71.9]

5.1.1. The permittee shall pay an annual permit fee in accordance with the procedures outlined below [40 CFR § 71.9(a)].

5.1.2. The permittee shall pay the annual permit fee each year. The fee shall be received no later than July 20 of each year.

5.1.3. The fee payment shall be in United States currency and shall be paid by money order, bank draft, certified check, corporate check, or electronic funds transfer payable to the order of EPA.

5.1.4. The permittee shall send fee payment and a completed fee filing form to:

For regular US postal service mail	For non-US Postal Service express (FedEx, Airborne, DHL, and UPS)
US Environmental Protection Agency FOIA and Miscellaneous Payments Cincinnati Finance Center PO Box 979078 St. Louis, MO 63197-9000	U.S. Bank Government Lockbox 979078 US EPA FOIA & Misc. Payments 1005 Convention Plaza SL-MO-C2-GL St. Louis, MO 63101
Contact: Craig Steffen 513-487-2091 or Eric Volck 513-487-2105	Contact: 314-418-1028

For electronic payment (identify permit number for payment in form)

Automated Clearinghouse (ACH) for receiving US currency
PNC Bank
ABA: 051036706
Account Number: 310006
CTX Format Transaction Code 22 – checking

Environmental Protection Agency
808 17th Street, NW
Washington, DC 20074

Contact: Jesse White 301-887-6548

5.1.5. The permittee shall send an updated fee calculation worksheet form and a photocopy of each fee payment check (or other confirmation of actual fee paid) submitted annually by the same deadline as required for fee payment to the address listed in Section 5.5. of this permit. [Note that an annual emissions report, required at the same time as the fee calculation worksheet by 40 CFR § 71.9(h), has been incorporated into the fee calculation worksheet form as a convenience.]

5.1.6. Basis for calculating annual fee:

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

5.1.6.1.1. "Actual emissions" means the actual rate of emissions in tons per year of any regulated pollutant (for fee calculation) emitted from a part 71 source over the preceding calendar year. Actual emissions shall be calculated using each emissions unit's actual operating hours, production rates, in-place control equipment, and types of materials processed, stored, or combusted during the preceding calendar year [See 40 CFR § 71.9(c)(6)].

5.1.6.1.2. If actual emissions cannot be determined using the compliance methods in the permit, the permittee shall use other federally recognized procedures [40 CFR § 71.9(e)(2)].

5.1.6.1.3. The term "regulated pollutant (for fee calculation)" is defined in 40 CFR § 71.2.

5.1.6.1.4. The permittee should note that the presumptive fee amount is revised each calendar year to account for inflation, and it is available from EPA prior to the start of each calendar year.

5.1.6.2. The permittee shall exclude the following emissions from the calculation of fees:

5.1.6.2.1. The amount of actual emissions of each regulated pollutant (for fee calculation) that the source emits in excess of 4,000 tons per year. See 40 CFR § 71.9(c)(5)(i).

5.1.6.2.2. Actual emissions of any regulated pollutant (for fee calculation) already included in the fee calculation. See 40 CFR § 71.9(c)(5)(ii).

5.1.6.2.3. The insignificant quantities of actual emissions not required to be listed or calculated in a permit application pursuant to 40 CFR § 71.5(c)(11) [40 CFR § 71.9(c)(5)(iii)].

5.1.7. Fee calculation worksheets shall be certified as to truth, accuracy, and completeness by a responsible official in accordance with 40 CFR § 71.5(d).

5.1.8. The permittee shall retain fee calculation worksheets and other emissions-related data used to determine fee payment for five years following submittal of fee payment. Emission-related data include, for example, emissions-related forms provided by EPA and used by the permittee for fee calculation purposes, emissions-related spreadsheets, and emissions-related data, such as records of emissions monitoring data and related support information required to be kept in accordance with 40 CFR § 71.6(a)(3)(ii) [See 40 CFR § 71.9(i)].

5.1.9. Failure of the permittee to pay fees in a timely manner shall subject the permittee to assessment of penalties and interest in accordance with 40 CFR § 71.9(l).

5.1.10. The EPA will not act on applications for permit renewal or modification if the permittee fails to pay all fees, interest, and penalties owed in full [See 40 CFR § 71.9(m)].

5.1.11. When notified by EPA of underpayment of fees, the permittee shall remit full payment within 30 days of receipt of notification [See 40 CFR § 71.9(j)(1) and (2)].

5.1.12. If the permittee thinks that the EPA-assessed fee is in error and wishes to challenge the fee, the permittee shall provide a written explanation of the alleged error to EPA along with full payment of the assessed fee. [See 40 CFR § 71.9(j)(3)].

5.2. Blanket Compliance Statement

5.2.1. The permittee must comply with all conditions and emissions limitations of this Part 71 permit. Any permit noncompliance, including: violation of any applicable requirement; any permit term, condition or emissions limitation; any fee or filing requirement; any duty to allow or carry out inspection, entry, or monitoring activities; or any regulation or order issued by the permitting authority pursuant to this part constitutes a violation of the CAA and is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [40 CFR §§ 71.6(a)(6)(i) and (ii)].

5.2.2. Consistent with Condition 5.18 below, determinations of deviations, continuous or intermittent compliance status, or violations of this permit, are not limited to the applicable testing or monitoring methods required by the underlying regulations of this permit; other credible evidence must be considered in such determinations [Section 113(a) and 113(e)(1) of the CAA].

5.3. Compliance Certifications

The permittee shall submit to EPA a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, annually each year no later than April 1. The compliance certification shall cover the same 12 month period as the two consecutive semi-annual monitoring reports. The compliance certification shall be certified as to truth, accuracy, and completeness by a responsible official consistent with 40 CFR § 71.5(d).

5.3.1. The certification shall include the following:

5.3.1.1. Identification of each permit term or condition that is the basis of the certification.

5.3.1.2. Identification of the method(s) or other means used for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. If necessary, the owner or operator also shall identify any other material information, e.g.,

operating hours records, that must be included in the certification to comply with section 113(c)(2) of the CAA, which prohibits knowingly making a false certification or omitting material information.

5.3.1.3. The compliance status of each term and condition of the permit for the period covered by the certification based on the method or means designated above. The certification shall identify each deviation and take it into account in the compliance certification.

5.3.1.4. Any other requirements sufficient to assure or determine compliance, consistent with section 40 CFR §§ 71.6(c)(5)(iii)(D) and section 71.6 (c)(6).

5.4. Duty to Provide and Supplement Information

The permittee shall furnish to EPA, within a time specified by EPA, any information that EPA may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to EPA copies of records that are required to be kept pursuant to the terms of the permit, including information claimed to be confidential. Information claimed to be confidential should be accompanied by a claim of confidentiality according to the provisions of 40 CFR Part 2, Subpart B. The permittee, upon becoming aware that any relevant facts were omitted or that incorrect information was submitted in the permit application, shall promptly submit such supplemental facts or corrected information. The permittee shall also provide additional information as necessary to address any requirements that become applicable to the facility after this permit is issued [40 CFR §§ 71.6(a)(6)(v) and 71.5(b)].

5.5. Submissions

Any document required to be submitted by this permit shall be certified by a responsible official as to truth, accuracy, and completeness. Such certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. All documents required to be submitted, including records, reports, test data, monitoring data, emissions-related data, notifications, and compliance certifications, shall be submitted to:

Air Enforcement Section, 6EN-A
U.S. EPA, Region 6
1445 Ross Avenue

Dallas, TX 75202-2733

while the fee calculation worksheets,(that include the annual emissions worksheet and report), and applications for renewals and permit modifications shall be submitted to:

Air Permits Section, 6PD-R
U.S. EPA, Region 6
1445 Ross Avenue
Dallas, TX 75202-2733

5.6. Severability Clause [40 CFR § 71.6(a)(5)]

The provisions of this permit are severable, and in the event of any challenge to any portion of this permit, or if any portion is held invalid, the remaining permit conditions shall remain valid and in force.

5.7. Permit Actions [40 CFR § 71.6(a)(6)(iii)]

This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

5.8. Administrative Permit Amendments [40 CFR § 71.7(d)]

The permittee may request the use of administrative permit amendment procedures for a permit revision that:

5.8.1. Corrects typographical errors;

5.8.2. Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;

5.8.3. Requires more frequent monitoring or reporting by the permittee;

5.8.4. Allows for a change in ownership or operational control of a source where EPA determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to EPA;

5.8.5. Incorporates into this permit the requirements from preconstruction review permits authorized under an EPA-approved program, provided that such a program meets procedural requirements substantially equivalent to the requirements of sections 71.7 and 71.8 that would be applicable to the change if it were subject to review as a permit modification, and compliance requirements substantially equivalent to those contained in section 71.6; and

5.8.6. Incorporates any other type of change which EPA has determined to be similar to those listed above in subparagraphs 5.8.1. through 5.8.5. [Note to permittee: If these subparagraphs do not apply, please contact EPA for a determination as to similarity prior to submitting your request for an administrative permit amendment under this provision].

5.9. Minor Permit Modifications [40 CFR § 71.7(e)(1)]

5.9.1. The permittee may request the use of minor permit modification procedures only for those modifications that:

5.9.1.1. Do not violate any applicable requirement;

5.9.1.2. Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

5.9.1.3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis.

5.9.1.4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:

5.9.1.4.1. A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of title I; and

5.9.1.4.2. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the CAA.

5.9.1.5. Are not modifications under any provision of title I of the CAA; and

5.9.1.6. Are not required to be processed as a significant modification.

5.9.2. Notwithstanding the list of changes eligible for minor permit modification procedures in paragraph 5.9.1. above, minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in an applicable implementation plan or in applicable requirements promulgated by EPA.

5.9.3. An application requesting the use of minor permit modification procedures shall meet the requirements of § 71.5(c) and shall include the following:

5.9.3.1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;

5.9.3.2. The source's suggested draft permit;

5.9.3.3. Certification by a responsible official, consistent with § 71.5(d), that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and

5.9.3.4. Completed forms for the permitting authority to use to notify affected States as required under 40 CFR § 71.8.

5.9.4. The source may make the change proposed in its minor permit modification application immediately after it files such application. After the source makes the change allowed by the preceding sentence, and until EPA takes any of the actions authorized by § 71.7(e)(1)(iv)(A) through (C), the source must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time period, the source need not comply with the existing permit terms and conditions it seeks to modify. However, if the source fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it.

5.9.5. The permit shield under 40 CFR § 71.6(f) may not extend to minor permit modifications [See § 71.7(e)(1)(vi)].

5.10. Group Processing of Minor Permit Modifications [40 CFR § 71.7(e)(2)]

5.10.1. Group processing of modifications by EPA may be used only for those permit

modifications:

5.10.1.1. That meet the criteria for minor permit modification procedures under paragraphs 5.9.1. of this permit; and

5.10.1.2. That collectively are below the threshold level of 10 percent of the emissions allowed by the permit for the emissions unit for which the change is requested, 20 percent of the applicable definition of major source in 40 CFR § 71.2, or five tons per year, whichever is least.

5.10.2. An application requesting the use of group processing procedures shall be submitted to EPA, shall meet the requirements of 40 CFR § 71.5(c), and shall include the following:

5.10.2.1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs.

5.10.2.2. The source's suggested draft permit.

5.10.2.3. Certification by a responsible official, consistent with 40 CFR § 71.5(d), that the proposed modification meets the criteria for use of group processing procedures and a request that such procedures be used.

5.10.2.4. A list of the source's other pending applications awaiting group processing, and a determination of whether the requested modification, aggregated with these other applications, equals or exceeds the threshold set under subparagraph 5.10.1.2. above.

5.10.2.5. Completed forms for the permitting authority to use to notify affected States as required under 40 CFR § 71.8.

5.10.3. The source may make the change proposed in its minor permit modification application immediately after it files such application. After the source makes the change allowed by the preceding sentence, and until the permitting authority takes any of the actions authorized by 40 CFR § 71.7(e)(1)(iv)(A) through (C), the source must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time period, the source need not comply with the existing permit terms and conditions it seeks to modify. However, if the source fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it.

5.10.4. The permit shield under 40 CFR § 71.6(f) may not extend to group processing of minor permit modifications [See § 71.7(e) (1)(vi)].

5.11. Significant Permit Modifications [40 CFR § 71.7(e) (3)]

5.11.1. The permittee must request the use of significant permit modification procedures for those modifications that:

5.11.1.1. Do not qualify as minor permit modifications or as administrative amendments.

5.11.1.2. Are significant changes in existing monitoring permit terms or conditions.

5.11.1.3. Are relaxations of reporting or recordkeeping permit terms or conditions.

5.11.2. Nothing herein shall be construed to preclude the permittee from making changes consistent with Part 71 that would render existing permit compliance terms and conditions irrelevant.

5.11.3. Permittees must meet all requirements of part 71 including those for applications, public participation, and review by affected States as they apply to permit issuance and permit renewal. For the application to be determined complete, the permittee must supply all information that is required by 40 CFR § 71.5(c) for permit issuance and renewal, but only that information that is related to the proposed change [See 40 CFR §§ 71.7(e) (3)(ii) and 71.5(a)(2)]

5.12. Reopening for Cause [40 CFR § 71.7(f)]

The EPA shall reopen and revise this permit under the following circumstances:

5.12.1. Additional applicable requirements under the CAA become applicable to a major part 71 source with a remaining permit term of three or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to 40 CFR § 71.7(c)(3).

5.12.2. Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offsets plans shall be deemed to be incorporated into the permit.

5.12.3. The EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

5.12.4. The EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

5.13. Property Rights [40 CFR § 71.6(a) (6) (iv)].

This permit does not convey any property rights of any sort, or any exclusive privilege.

5.14. Inspection and Entry [40 CFR § 71.6(c) (2)]

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow EPA or an authorized representative to perform the following:

5.14.1. Enter upon the permittee's premises where a Part 71 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

5.14.2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

5.14.3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

5.14.4. As authorized by the CAA, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

5.15. Transfer of Ownership or Operation [40 CFR § 71.7(d) (1) (iv)]

A change in ownership or operational control of this facility may be treated as an

administrative permit amendment if EPA determines no other changes in this permit are necessary and provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to EPA.

5.16. Off Permit Changes [40 CFR § 71.6(a) (12)]

The permittee is allowed to make certain changes without a permit revision, provided that the following requirements are met:

5.16.1. Each change is not addressed or prohibited by this permit;

5.16.2. Each change shall comply with all applicable requirements and may not violate any existing permit term or condition;

5.16.3. Changes under this provision may not include changes or activities subject to any requirement under Title IV or that are modifications under any provision of Title I of the CAA;

5.16.4. The permittee shall provide contemporaneous written notice to EPA of each change, except for changes that qualify as insignificant activities under § 71.5(c) (11). The written notice must describe each change, the date of the change, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change;

5.16.5. The permit shield does not apply to changes made under this provision; and

5.16.6. The permittee must keep a record describing all changes that result in emissions of any regulated air pollutant subject to any applicable requirement not otherwise regulated under this permit, and the emissions resulting from those changes.

5.17. Permit Expiration and Renewal [40 CFR §§ 71.5(a)(1)(iii), 71.6(a)(11), 71.7(b), 71.7(c)(1)(i) and (ii), 71.8(d)]

5.17.1. This permit shall expire upon the earlier occurrence of the following events:

5.17.1.1. Five years elapses from the date of issuance; or

5.17.1.2. The source is issued a part 70 permit by an EPA-approved permitting authority.

5.17.2. Expiration of this permit terminates the permittee's right to operate unless a timely and complete permit renewal application has been submitted at least six months, but not more than 18 months, prior to the expiration of this permit.

5.17.3. If the permittee submits a timely and complete permit application for renewal, consistent with 40 CFR § 71.5(a) (2), but the permitting authority has failed to issue or deny the renewal permit, then the permit shall not expire until the renewal permit has been issued or denied and any permit shield granted pursuant to 40 CFR § 71.6(f) may extend beyond the original permit term until renewal.

5.17.4. The permittee's failure to have a Part 71 permit, where timely and complete application for renewal was submitted, is not a violation of this part until EPA takes final action on the permit renewal application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit any additional information identified as being needed to process the application by the deadline specified in writing by EPA.

5.17.5. Renewal of this permit is subject to the same procedural requirements that apply to initial permit issuance, including those for public participation and affected State and tribal review.

5.17.6. The application for renewal shall include the current permit number, description of permit revisions and off-permit changes that occurred during the permit term, any applicable requirements that were promulgated and not incorporated into the permit during the permit term, and other information required by the application form.

5.18. Credible Evidence (40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997))

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements, if the appropriate performance or compliance test or procedure had been performed, shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

Document No. 19

Source Determination for
Enterprise Field Services LLC – Lindrith Compressor Station

Statutory and Regulatory Background

Title V of the federal Clean Air Act (Act) requires every major source of air pollution to obtain an operating permit. *See* 42 USC § 7661a(a). EPA operates the Title V permitting program directly in reservation areas of "Indian country," as that term is defined at 40 CFR § 71.2. *See* 40 CFR § 71.4(b). Since the Lindrith Compressor Station is a major source located within the exterior boundaries of the Jicarilla-Apache reservation, the Title V permitting requirements found at 40 CFR Part 71 ("Part 71") apply.

A "major source" under Title V means any stationary source (or any group of stationary sources located within a contiguous area and under common control) that is either: (1) a "major source," as defined in section 112 of the Act; or (2) a "major stationary source," as defined in section 302(j) of the Act or part D of Title I of the Act. *See* 42 USC § 7661(2). Likewise, EPA's definition of a "major source" under Part 71 largely incorporates the statutory definition. Under 40 CFR § 71.2, "major source" means any stationary source[1] (or any group of stationary sources that are located on one or more contiguous or adjacent properties, and are under common control of the same person or persons under common control) belonging to a single major industrial grouping and that are described in paragraph (1), (2), or (3) of 40 CFR § 71.2 [the definition of major source].[2] For the purposes of defining "major source," a stationary source or group of stationary sources shall be considered part of a single industrial grouping if all of the pollutant-emitting activities at such source or group of sources on contiguous or adjacent properties belong to the same Major Group (i.e., all have the same two digit code) as described in the Standard Industrial Classification Manual, 1987. *See* 40 CFR 71.2.

Therefore, EPA considers three regulatory criteria when analyzing whether a group of pollutant-emitting activities constitute a single source for Title V permitting purposes: (1) whether the activities are under the common control of the same person (or persons under common control); (2) whether the activities belong to the same industrial grouping; and (3) whether the activities are located on one or more contiguous or adjacent properties. All three of the criteria must be met in order for the pollutant-emitting activities to be aggregated into the same source for Title V permitting purposes.

One aspect of the permitting process under Title V is a review of the record associated with the determination of which pollutant-emitting activities constitute the major source being

[1] 40 CFR § 71.2 defines "stationary source" to mean "any building, structure, facility, or installation that emits or may emit any regulated air pollutant or any pollutant listed under section 112(b) of the Act."

[2] Of particular relevance to this permitting action, paragraph (2) of 40 CFR § 71.2 includes "[a] major stationary source of air pollutants, as defined in section 302 of the Act, that directly emits or has the potential to emit, 100 tpy or more of any air pollutant subject to regulation . . ." *See* 40 CFR § 71.2.

Division, EPA, Region 7, and dated September 18, 1995, to the State of Iowa ("Spratlin letter"). A determination of common control may be made on the basis of direct control, such as when facilities are owned by the same controlling entity, or on the basis of indirect control. *See* Letter from Kathleen Henry, EPA, Region 3, and dated January 15, 1999, to Pennsylvania Department of Environmental Protection. Hence, the nature of the interactions between two facilities that may otherwise be considered part of the same source should be examined. In considering interactions among facilities, what is relevant is who has the power of authority to guide, manage, or regulate the pollutant-emitting activities of those facilities, including the power to make or veto decisions to implement major emission control measures or influence production levels or compliance with environmental regulations. *See* Memorandum entitled "Major Source Determinations for Military Installations," from John Seitz, Director, Office of Air Quality Planning and Standards, EPA, and dated August 2, 1996, to EPA Regional Air Directors.[5] Although arising within the context of co-located facilities, the Spratlin letter referenced above provides additional guidance on the types of questions that may be asked by the permitting authority during its "common control" analysis of whether two facilities are under common control.

b. *Analysis for Lindrith Compressor Station*: By letter dated July 11, 2012, EPA requested Enterprise provide additional information relevant to our determination of the pollutant-emitting activities which comprise the stationary source which includes the Lindrith Compressor Station, including requests for information related to "common control." By letter dated October 24, 2012, Enterprise provided its response to EPA's request for information. In that response, Enterprise provided the following information:

- There are 1,379 wells, from 53 separate well operators, upstream of the Lindrith Compressor Station that deliver natural gas to the station. Once gas from a particular well is metered and flows into the gathering lines, that gas becomes commingled with other gas from wells operated by other, separate companies.
- Enterprise owns the gathering lines that carry the gas to the Lindrith Compressor Station, but it does not own the wells or production equipment at any well site, the property between the individual well sites, or the property between the wells and the station.[6]

[5] *See also* memorandum from Edward E. Reich, Director, Stationary Source Compliance Division, to Diana Dutton, Director, Enforcement Division, EPA, Region 6, dated March 16, 1979. The phrase, "the power to make or veto decisions to implement major emission-control measures," comes from 44 Fed. Reg. 3279, January 16, 1979, the Agency's Interpretive Ruling on PSD regulations from June 19, 1978 (43 Fed. Reg. 26404).

[6] In the cover letter to its response, Enterprise Products also states that it does not own or operate any oil and gas wells in the San Juan Basin and that it only provides contract gas gathering, processing, and compression services.

2. Same Industrial Grouping – SIC Code

a. *General Discussion*: The Part 71 regulations state that "for purposes of defining major source,' a stationary source or group of stationary sources shall be considered part of a single industrial grouping if all of the pollutant emitting activities at such source or group of sources on contiguous or adjacent properties belong to the same Major Group (i.e., all have the same two-digit code) as described in the Standard Industrial Classification Manual, 1987." *See* 40 CFR 71.2.

b. *Analysis for Lindrith Compressor Station as related to other Enterprise assets in the San Juan Basin*: Within its October 24, 2012 response to EPA's July 11, 2012 request for additional information, Enterprise indicated that the Lindrith Compressor Station as well as the other assets it owns in the San Juan Basin (as indicated in Attachment B to the letter) possess the same SIC Code (1311). SIC Code 1311 includes "Establishments primarily engaged in operating oil and gas field properties."[7] All of the emission units at the Lindrith Compressor Station identified in their permit application, which include the three Caterpillar Model 3612 LE natural gas fired compressor engines and the Caterpillar Model 3304 Emergency Generator are associated with the gathering of natural gas for transmission to the Chaco Gas Processing Plant. Furthermore, the Major Group 13 – Oil and Gas Extraction includes establishments engaged in producing crude petroleum and natural gas, producing natural gasoline and cycle condensate. Therefore, all of the emission units at the Lindrith Compressor Station would be included in the Standard Industrial Classification Code of 1311. In addition, as indicated above, Enterprise notes that the other compressor stations and its Chaco processing plant possess the same Major Group 13 SIC Code; therefore, EPA believes that further analysis of the Chaco sites should be analyzed under the third criteria – "contiguous or adjacent" to determine if pollutant-emitting activities from those sites should be aggregated with the Lindrith Compressor Station.

3. Contiguous or Adjacent

a. *General Discussion*: The Part 71 regulations do not define the term "contiguous or adjacent properties" within the definition of "major source" (See 40 CFR § 71.2); however, as stated above, EPA intended the language and application of the Part 71 definition of "stationary source," including the concept of "contiguous or adjacent," to be consistent with the PSD definition of "stationary source" contained in 40 CFR

[7] Executive Office of the President; Office of Management and Budget; Standard Industrial Classification Manual 1987; National Technical Information Service; Springfield, Virginia (1987).

miles away from the Lindrith Compressor Station and the other compressor stations are located at much greater distances; the Chaco processing plant is located over 40 miles away. Given the specific facts of this case – each compressor station is located at a distance of 15 miles or greater from Lindrith, and the Chaco processing plant is located over 40 miles away – it is reasonable to conclude that the Chaco sites and the Chaco processing plant are too far apart to be considered "contiguous or adjacent" to the Lindrith Compressor Station and, therefore, the emissions associated with those sites should not be aggregated with the Lindrith Compressor Station for purposes of defining the "stationary source" to be permitting under Title V.

Conclusion

After analysis of available information as explained above, we have determined that no pollutant-emitting activities should be aggregated with the activities at the Lindrith Compressor Station for purposes of defining the stationary source to be permitted under Title V. As discussed in detail above, the only activities that are controlled by (or are under common control of) Enterprise or its related entities and that fall within the same SIC Code as the Lindrith Compressor Station are the other Enterprise compressor stations and processing plants. But, under the facts of this case, these stations and plants are too far apart to be "adjacent" to one another or to the Lindrith Compressor Station. Accordingly, we believe it is reasonable to conclude that only pollutant-emitting activities from the Lindrith Compressor Station comprise the "stationary source" subject to the Title V permitting requirements.

Document No 20

PUBLIC NOTICE

Enterprise Field Services, LLC

Lindrith Compressor Station

ANNOUNCEMENT OF DRAFT PERMIT, OPPORTUNITY TO REQUEST A PUBLIC HEARING, AND REQUEST FOR PUBLIC COMMENT ON DRAFT CLEAN AIR ACT TITLE V PERMIT

Public Comment Period September 30, 2015 to October 30, 2015

Notice of Intent to Issue a Clean Air Act, Title V, Federal Operating Permit, United States Environmental Protection Agency (EPA), Region 6, Multimedia Planning and Permitting Division.

Take notice that the United States Environmental Protection Agency has received an application for the renewal and update of an operating permit for the following stationary source:

The Enterprise Field Services, LLC Lindrith Compressor Station, located 20 miles west of Lindrith, New Mexico. The mailing address is: Enterprise Field Services, LLC, P.O. Box 4324, Houston, Texas 87113.

The Enterprise Field Services, LLC, Lindrith Compressor Station is located on the Jicarilla Apache Reservation, Rio Arriba County, New Mexico. The source is a natural gas compression and transmission facility with pressurized natural gas as its principal products. The source emits the following pollutants: carbon dioxide, particulate matter with diameters 2.5 and 10 microns or less, oxides of nitrogen, volatile organic compounds, hazardous air pollutants and greenhouse gas emissions. This action proposes the following annual emission increases and decreases to the facility's potential to emit (PTE) on a ton per year (tpy) basis at the Enterprise Field Services, LLC, Lindrith Compressor Station: - 2.19 tpy of nitrogen oxides (NOx), 4.04 tpy of sulfur dioxide (SO2), 7.07 tpy of carbon monoxide (CO), 2.91 tpy of particulate matter less than 10 micrometers in diameter (PM10), 2.91 tpy of particulate matter less than 2.5 micrometers in diameter (PM2.5), -14.94 tpy of Volatile Organic Compounds (VOC), -17.94 tpy of Hazardous Air Pollutants (HAPs), 10.05 Formaldehyde (HCHO), and 35,556 of tpy Greenhouse Gas Emissions (GHG CO_2e) .

This source is subject to the provisions of EPA permit R6FOPP71-03 and is required to obtain a Clean Air Act Title V Renewal Permit to Operate in accordance with Part 71 of Title 40 of the Code of Federal Regulations (CFR). The permit will contain all the Clean Air Act requirements that apply to the source and is subject to the administrative requirements of 40 CFR § 71.11.

Members of the public may review a copy of the draft permit prepared by EPA, the statement of basis for the draft permit, the application, and all relevant supporting materials at the EPA Region 6 web site, http://yosemite.epa.gov/r6/Apermit.nsf/Part71, or by contacting Randy Pitre at Air Permits Section, Multimedia Planning and Permitting Division, U.S. EPA Region 6, Suite 1200, 1445 Ross Avenue, Dallas, Texas 75202, or at (214) 665-7299, or by email to pitre.randy@epa.gov. All data submitted by the applicant are available as part of the administrative record and will be available for review at the EPA Region 6 office, Monday – Friday, from 7:30 a.m. -4:30 p.m., excluding Federal holidays. Documents will also be available at the Jicarilla Public Library, 165 Hawk Drive, Dulce, New Mexico, 87528, phone 575-759-1776. Please call in advance to arrange viewing times.

If you have comments on the draft permit, you must submit them on or before October 30, 2015. You have the right to request a public hearing on the draft permit. If EPA determines that there is a significant amount of public interest in the draft permit, the EPA has the right to hold a public hearing. Any request for a public hearing must be received by the EPA either by email or mail by October 23, 2015, and must state the nature of the issues proposed to be raised in the hearing. Attendance at the public hearing is not required in order to submit written comments. *If the EPA determines that there is significant public interest*, a public hearing will be held on Wednesday, November 4, 2015, from 5:00 p.m. to 7:00 p.m. at Dulce High School, #91 Hawk Drive, Dulce, New Mexico, (505) 759-3353.

If a public hearing is held, the public comment period shall automatically be extended to the close of the public hearing. The EPA maintains the right to cancel a public hearing if no request for a public hearing is received by October 23, 2015, or the EPA determines that there is not a significant interest. *If the public hearing is cancelled*, notification of the cancellation will be posted by October 27, 2015, on the EPA's Website http://yosemite.epa.gov/r6/Apermit.nsf/AirP. Individuals may also call the EPA at the contact number listed above to determine if the public hearing has been cancelled.

All comments and public hearing requests should be addressed to Randy Pitre, Air Permits Section, Multimedia Planning and Permitting Division, U.S. EPA Region 6, Suite 1200, 1445 Ross Avenue, Dallas, Texas 75202, or by email to pitre.randy@epa.gov. All comments received by October 30, 2015, and all comments made during a public hearing will be considered in arriving at a final decision on the permit. Additionally, all comments will be included in the administrative record without change, and may be made available to the public, including any personal information provided, unless the comment includes Confidential Business Information (CBI) or other information whose disclosure is restricted by statute. Thus, CBI or other protected information should be clearly identified as such, and should not be submitted through email. Emails sent directly to the EPA will capture your email address automatically and will be included as a part of the public comment. Please note that an email or postal address must be

provided with your comments if you wish to receive a statement of reasons for changes made to the draft permit and responses to comments submitted during the public comment period.

If you believe any condition of the draft permit is inappropriate or that our initial decision to deny an application, terminate a permit, or prepare a draft permit is inappropriate, you must raise all reasonably ascertainable issues and submit all reasonably ascertainable arguments supporting your position by the close of the public comment period. Any supporting materials that you submit must be included in full and may not be incorporated by reference, unless they are already part of the administrative record for this permit proceeding or consist of State, tribal, or Federal statutes and regulations, EPA documents of general availability, or other generally available reference materials.

Pitre, Randy

From: Li, Jing <jli@eprod.com>
Sent: Tuesday, September 15, 2015 12:29 PM
To: Pitre, Randy
Cc: Bartley, Richard; Robinson, Jeffrey; Verhalen, Frances
Subject: RE: Enterprise Products Lindrith Compressor Station

I first calculated the internal volume of the pipe, using an internal diameter of 33.25 inches or 2.77 feet, this gives a radius of 1.385 feet. And using a length of 25 feet:

$\pi \times (1.385)^2 \times 25 = 150.66$ cubic feet.

I then accounted for the pressure increase from atmosphere to 50 psig.

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150.66 X (62/12) = 778 cubic feet

From: Li, Jing
Sent: Tuesday, September 15, 2015 11:26 AM
To: 'Pitre, Randy'
Cc: Bartley, Richard; Robinson, Jeffrey; Verhalen, Frances
Subject: RE: Enterprise Products Lindrith Compressor Station

Here are the methodology:

There are two lines pigged into the tanks at Lindrith, 2C-15 and 2C-4. The pigs are received in a 34" diameter by 25' long receiver. The receiver is blown down from 50# to atmosphere resulting in 778 scf gas per blowdown.

Did this satisfy? Or you still need detailed equation?

Thanks,

From: Pitre, Randy [mailto:Pitre.Randy@epa.gov]
Sent: Tuesday, September 15, 2015 10:58 AM
To: Li, Jing
Cc: Bartley, Richard; Robinson, Jeffrey; Verhalen, Frances
Subject: RE: Enterprise Products Lindrith Compressor Station

Li,

Please provide the equation or specific calculation methodology method being utilized as "engineering methodology" for determining the pipeline pigging emissions. It is not uncommon for us to receive public comments on the specific methodology or calculations that will be utilized to determine emissions for MSS emissions. We would prefer to have as specific as possible how you plan to determine the pipeline pigging emissions prior to us proceeding to public notice. This allows us to include this in our permit record and would aid our ability to respond to a public comment should one be received on the emissions.

At this point, we are planning to publish the public notice in a daily or weekly newspaper of general circulation within the area of the Tribal Nation sometime near the end of September.

Randy L. Pitre
Air Permits Section
U.S. EPA Region 6
Office: (214) 665-7299

From: Li, Jing [mailto:jli@eprod.com]
Sent: Monday, September 14, 2015 2:18 PM
To: Pitre, Randy
Cc: Bartley, Richard; Robinson, Jeffrey; Verhalen, Frances
Subject: RE: Enterprise Products Lindrith Compressor Station

Hi Randy,

The emission methods for estimating pipeline pigging were based on engineering methodology (provide scf/hr & scf/yr) and mass balance (conver scf/hr and scf/yr to lb/hr and lb/yr) just like the blowdown emissions. Please let me know if you need further clarification regarding that. Enterprise would like to know when public notice can be started. Also below is how we monitor the fuel usages for each engine and we would like to know if this satisfies Condition 3.2.5 on page 7 of the draft permit: we do a calculation to get the fuel of each engine based on a metered value on the control panel of each of the Caterpillar engine. The meter calculates the fuel flow based on the measured fuel manifold pressure, fuel manifold temperature, air inlet manifold pressure, air inlet manifold temperature, engine speed and BTU settings. Our in-house emission tester did some comparisons on an engine with a fuel meter and got very close agreement.

Thanks,

From: Pitre, Randy [mailto:Pitre.Randy@epa.gov]
Sent: Monday, September 14, 2015 11:42 AM
To: Li, Jing
Cc: Bartley, Richard; Robinson, Jeffrey; Verhalen, Frances
Subject: RE: Enterprise Products Lindrith Compressor Station

Hi Jing,

Please provide the emission method factors that were used to prepare the emission estimates for the pipeline pigging receiver emissions. We will need this information for the permit administrative record.

Randy L. Pitre
Air Permits Section
U.S. EPA Region 6
Office: (214) 665-7299

From: Li, Jing [mailto:jli@eprod.com]
Sent: Wednesday, September 02, 2015 8:11 AM
To: Pitre, Randy
Cc: Bartley, Richard; Robinson, Jeffrey; Verhalen, Frances
Subject: RE: Enterprise Products Lindrith Compressor Station

Good morning Randy,

Please see attached for the revised Lindrith MSS emissions with pigging emissions included. Thanks and let me know if you have questions.

Jing

From: Pitre, Randy [mailto:Pitre.Randy@epa.gov]
Sent: Monday, August 31, 2015 11:46 AM
To: Li, Jing
Cc: Bartley, Richard; Robinson, Jeffrey; Verhalen, Frances
Subject: Enterprise Products Lindrith Compressor Station

Jing,

We will be addressing the cover letter for the draft permit to Mr. Terry Hurlbut, who certified the latest updated application on February 2, 2014. Please confirm if Mr. Hurlburt is the correct addressee. Additionally, please advise when your emissions information on the pipeline pigging station will be available for review.

Randy L. Pitre
Air Permits Section
U.S. EPA Region 6
Office: (214) 665-7299