

**From:** [Morris, Mitch](#)  
**To:** [LeDoux, Erica](#)  
**Cc:** [Robinson, Jeffrey](#)  
**Subject:** RE: Los Mestienos Draft Permit and SOB  
**Date:** Thursday, May 11, 2017 3:16:34 PM  
**Attachments:** [image002.png](#)  
[Los Mestienos fuel monitoring example.xlsx](#)  
[Los Mestienos Draft Permit\\_042117\\_MM Comments.docx](#)

Erica,

Thank you for the opportunity to review and comment on the draft permit for Los Mestienos Compressor Station. Please see my questions/comments below as well as the "marked up" version of the permit attached.

1. Minor detail throughout the permit: *Williams Four Corners LLC* is the correct form of the legal name of the company (omitting the comma following the word *Corners*).
2. Document page 1: Please change the Plant Contact info to me (using the information below).
3. Document page 2: Table 1: Emission Units and Control Devices; could we please expand footnote 2 to include the manufacture date for unit T-2?
4. Condition 3.2.4.1: I would like to more clearly define what constitutes "continuously" in this condition. We're currently monitoring fuel flow/consumption continuously, but what does EPA consider continuous monitoring? Furthermore, Williams requests a downtime allowance for routine maintenance, calibration, or repair/replacement of the meter.
5. Condition 3.2.4.2: Could you please give me a call to discuss this condition? The attached file named *Los Mestienos fuel monitoring example.xlsx* demonstrates how we're currently obtaining this data.
6. Condition 3.2.5.3: Please see the table below, demonstrating the permitted PTE tpy vs. throughput at significance (last column). This table demonstrates we would have a difficult time ever achieving 2.0 tpy of VOC emissions from any of our tanks. This table also demonstrates that we cannot achieve NOx emissions of IEU3 & IEU4 at the significance level of 2.0 tpy, because the units have a rated capacity of 0.3 MMBtu/hr. Williams proposes this condition be removed.

Los Mestienos Insignificant Sources

Unit No.	Emission Source	max pollutant	PTE tpy	throughput, bbl/yr	Significance Level, tpy	throughput at Significance, bbl/yr
IEU T-3	Produced Water Tank (70 bbl)	VOC	1.06	840	2.0	1585
IEU T-4	Lube Oil Storage Tank (500 gal)	VOC	0	143	2.0	#DIV/0!
IEU T-5	Used Oil Storage Tank (500 gal)	VOC	0	143	2.0	#DIV/0!
IEU T-6	Ambitol Storage Tank (350 gal)	VOC	0.000015	50	2.0	6,666,667
IEU T-7	Methanol Storage Tank (500 gal)	VOC	0.019145	143	2.0	14,924
F-2	Truck Loading	VOC	1.12	21,000	2.0	37,500
		max pollutant	PTE tpy	throughput, MMBtu/hr	Significance Level, tpy	throughput, MMBtu/hr
IEU 3	Fuel Gas Heater (0.3 MMBtu/hr)	NOx	0.15	0.3	2.0	4.0
IEU 4	Tank Heater (0.3 MMBtu/hr)	NOx	0.15	0.3	2.0	4.0

VOC emissions are 0  
VOC emissions are 0

7. 3.2.5.7: The attached document *Los Mestienos fuel monitoring example.xlsx* demonstrates how Williams determines each unit's actual heat input rate every month. Please see the suggested omission included in the attached "marked up" version of the draft permit.

Other than these few items, I think the permit looks great. As always, please feel free to contact me to discuss any questions you may have.

Thanks Erica,

**Mitch Morris** | Williams | Environmental Specialist | Operational Excellence  
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**From:** LeDoux, Erica [<mailto:LeDoux.Erica@epa.gov>]  
**Sent:** Wednesday, May 03, 2017 3:50 PM  
**To:** Morris, Mitch <[Mitch.Morris@williams.com](mailto:Mitch.Morris@williams.com)>  
**Cc:** Robinson, Jeffrey <[Robinson.Jeffrey@epa.gov](mailto:Robinson.Jeffrey@epa.gov)>  
**Subject:** Los Mestenos Draft Permit and SOB

Hi Mitch;

Attached for your review please find the draft statement of basis and draft permit for the Williams Four Corners, Los Mestenos Compressor. Our goal is to public notice the documents the week of May 29<sup>th</sup> 2017. Because of this, we will need WFC's review and comments by Friday, May 12<sup>th</sup>. Please let me know if this proposed schedule is doable for you or if you anticipate you will not be able to comment by this date.

Thank you, Erica

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