



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

May 24, 2017

STATEMENT OF BASIS

**For draft Air Pollution Control Title V Permit to Operate for Permit Renewal
No. R6FOP-NM-04-R2 (replaces R6NM-04-10R1M1).**

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

The applicant is: Williams Four Corners LLC
Los Mestenos Compressor Station
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. These regulations were updated on February 19, 1999 (64 FR 8247) to incorporate EPA's approach for issuing Federal operating 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 the exterior boundaries of tribal reservations, EPA will administer and enforce a Part 71 Federal Operating Permits Program for stationary sources until Tribes receive approval to administer their own Operating Permits Programs.

2. Proposed Changes to the Title V Permit

The following changes are being proposed by this Title V permit renewal action:

- a. Correct emissions for Unit 2, the Caterpillar G-399-TA compressor engine, in order to more accurately reflect the unit's potential to emit (PTE), in accordance with Condition 3.2.4.3 of the previous Title V permit R6NM-04-10R1M1.

- b. Tank T-1 is an existing tank identified in the current Title V permit as a 500-bbl tank. Repairs have been made to the tank, consisting of the installation of a new floor over the existing leaking floor. These repairs have reduced the capacity of the tank to 490 bbl.
- c. An existing 300-bbl condensate storage tank was removed in August 2014 and replaced with a 400 bbl condensate storage tank T-2 that will act as an overflow tank for tank T-1.
- d. Address correction from 188 County Road 4900 to 1755 Arroyo Drive.
- e. Correct the facility's latitude and longitude coordinates from: Lat: 36° 27' 11" N Long: 107° 19' 7" W to Lat: 36° 27' 03" N Long: 107° 19' 02" W.
- f. Existing maintenance startup, and shutdown (MSS) emissions will be separately identified in this permitting action.
- g. Decrease facility-wide source potential to emit (PTE) NO_x emissions to 129.5 tpy, decrease CO emissions to 29.7 tpy, and decrease VOC emissions to 108.9 tpy.

3. The Jicarilla Apache Nation

Tribal Members:	3,136
Reservation population:	3,225
Acreage:	1,000,000
Checkerboard:	No
Address:	Location: 160 miles northwest of Santa Fe P.O. Box 507, Dulce, NM 87528
Phone:	(575) 759-3242
Fax:	(575) 759-3005
Internet:	Yes
GIS capability:	Yes
Homepage:	http://jicarillaonline.com/

- a. Geographical boundaries: The 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. History: The Jicarilla Apache were one of six southern Athapascan groups which

migrated out of Canada sometime between A.D. 1300 and 1500. Their traditional American Southwest homeland covered more than 50 million acres spreading across the central and eastern region of northern New Mexico and adjoining portions of southern Colorado and western Oklahoma. The Jicarilla preserved much of their fundamental Athapascan culture after settling in the Southwest, but gradually adopted some of the cultural traits of their aboriginal neighbors from the Plains and the Upper Rio Grande. The Tribe's sovereign rights are vested in the Tribal Council, which serves as the legislative body, and an executive branch, which is headed by a president and vice president. The Tribe has created and funds an independent Tribal court of general jurisdiction. The Jicarilla Apache were the first tribe in the United States to acquire and operate their own oil and gas production company.

- c. Current Leadership: Edward Velarde, Acting President
Jicarilla Apache Nation
P. O. Box 507
Dulce, NM 87528
Phone: (575) 759-3242
Fax: (575) 759-3005
- d. Selection process of tribal leaders: Tribal members 18 and older vote in a general election every four years in July. The legislative power of the Jicarilla Apache Tribe is exercised by the Tribal Council, which holds its sessions at the seat of the tribal government. The tribal council consists of eight members, elected at large from the membership of the Jicarilla Apache Tribe. A primary election to select candidates for the offices of president and vice president is held at least 30 days before each general election of the tribe at which the office of president and vice president are to be voted on. A general election for the Offices of President and Vice President is held every four (4) years on the second Saturday following National Independence Day.
- e. Environmental Protection Office: Cordell TeCube, Environmental Director
cltecube@yahoo.com
7421
Phone: (575) 759-
Fax: (575) 759-7565
- f. Local air quality and attainment status: The reservation is in a CAA attainment area. The Jicarilla's reservation is located within the Four Corners region, which is characterized as a rural area with oil and gas production but no heavy industry. Generally, this area is considered to have good air quality despite a lack of quantitative data. With the development of energy reserves, resulting in emissions of SO₂, TSP, NO_x and VOCs, the Jicarilla Apache Tribe is seriously concerned about the implication of change for its land, environment, and people. Therefore, requested funding has primarily provided the tribe with support to develop an air monitoring network. Currently, the Tribe maintains three PM₁₀ monitors for tribal lands.

4. Facility Information

- a. Location: The Williams Four Corners LLC, Los Mestenos Compressor Station is located 15 miles northwest of Gavilan, New Mexico at Lat: 36° 27' 03" N; Lon: 107° 19' 02" W

The mailing address is:

Williams Four Corners LLC
1755 Arroyo Drive
Bloomfield, NM 87413

- b. Facility Contact/Responsible Official

The facility contact is Mr. Mitch Morris and the responsible official is Mr. Glen Jasek.

- c. Description of Operations and Products

The Los Mestenos Compressor Station, with Standard Industrial Classification code 1389, 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 compression occurs through a turbine-driven natural gas engine and a reciprocating-engine-driven natural gas compressor for injection into pipelines for transportation to the gas plant. The turbine-driven compressor engine is the Solar Saturn 1200 Turbine (Unit No. 1 with Serial No. SC7895681), and the natural gas compressor engine is the Caterpillar G-399-TA Reciprocating Internal Combustion engine (RICE) (Unit No.2 with Serial No. 49-C-200). Emission Unit T-1 is a fixed roof storage condensate storage tank with a 490 bbl capacity. The serial number on this unit is 25428. Additionally, an existing 300 bbl condensate storage tank was removed in August 2014 and replaced with a 400 bbl condensate storage tank T-2 to act as an overflow tank for tank T-1. This is to prevent overflows from T-1 during times when haul truck access is limited due to outside factors such as weather and/or road conditions. See Table 4 below for full description and range of operation of this equipment. It is expected that the source will keep records of the serial numbers, any change in the serial number for each emissions unit, and reflect these changes in all reports. Unit No. F-1 is the source fugitives from valves, pump seals, compressor seals, pressure relief valves, connectors, and open ended valves. Emissions from Unit No. F-1 were estimated from the EPA *1995 Protocol for Equipment Leak Emission Estimates*.

The remaining tanks at the facility are used for storing new and used lube oils, ambitrol, methanol, condensate, and produced water. There are two 0.3 Million British Thermal Units (MMBtu)/hour (hr) gas-fired heaters used to evaporate waste water from the storage tanks and heat fuel. Additionally, there are liquid loading losses (Unit F-2) from condensate loading. All of these units are claimed to be insignificant emission sources.

In May 2016, EPA updated the New Source Performance Standards (NSPS) and made amendments to the New Source Review (NSR) rules on Indian Country for the Oil and Gas sector. Facilities are required to conduct an analysis of sources within a quarter-mile for possible aggregation as necessary. There are two natural gas production wells within a quarter-mile of the Los Mestenos Compressor Station. However, based on information provided by Williams Four Corners LLC (WFC), the wells do not meet the “common sense notion of a plant” in that they are owned by other entities. Nor do the wells share “functional interrelatedness” with the Los Mestenos Compressor Station through shared equipment necessary to store natural gas because the wells are operated by other companies. Per the final rule in 81 FR 35622, “separate surface sites that do not include shared emitting equipment, even if within ¼ mile, will not be aggregated.” Further aggregation analysis was not needed.

d. Permitting and/or Construction History

The Los Mestenos Compressor Station is owned and operated by Williams Four Corners LLC. This is the Title V permit renewal for the facility. This source has been subject to the provisions of EPA permit NM-791-M2 and is required to renew its Clean Air Act Title V Permit to Operate (Permit No. R6NM-04-10R1M1), in accordance with Part 71 of Title 40 of the Code of Federal Regulations.

On September 13, 1993, the New Mexico Environment Department (NMED) issued a minor source construction permit to the Gas Company of New Mexico (GCNM) for the Los Mestenos Compressor Station, from an NMED *Streamline and General Compressor Permit Application and Notice of Intent for the State of New Mexico*. Both the GCNM and NMED assumed the Station was on State land. On March 1, 1995, the Public Service Company of New Mexico, the parent Company of GCNM, contacted EPA Region 6 to confirm that the Los Mestenos Compressor Station was not regulated by NMED and its 1993 permit should have been issued by EPA. In addition to an original federal construction permit application, the Public Service Company of New Mexico applied for a revision to the construction permit issued by NMED, based upon updated information and test results obtained after the initial issuance of the 1993 permit.

EPA issued Permit NM-791-M2 on October 1, 1996, in response to the expressed request of the permittee to establish federally enforceable emission limitations for the Los Mestenos Compressor Station. The turbine remained subject to NSPS requirements under 40 CFR Part 60, Subpart GG and other emission limits for the source placed it just under the PSD major source threshold level (i.e., 250 tpy). The federally enforceable conditions were deemed by EPA Region 6 as necessary to maintain this source at emission levels less than the 250 tpy PSD threshold level.

In a 1997 letter from Samuel Coleman, Director of Compliance Assurance and Enforcement Division, a custom fuel monitoring schedule was approved for the Solar Saturn 1200 turbine, subject to the NSPS requirements, which was attached to the

construction permit.

A permit application was received on October 5, 1999, requesting a Part 71 Operating Permit, after the submittal deadline was extended from 9/22/99 to 10/04/99. The initial Title V permit was issued on November 17, 2003. The conditions of Permit NM-971-M2 were incorporated by reference.

On May 7, 2004, an Administrative amendment to the Title V and NSR permit was granted to a request made by Williams Field Services, dated January 16, 2004, for a change to the reporting date for annual compliance reports and fee schedules.

On December 1, 2004, Williams Field Services requested a minor permit modification to the Title V permit, based on a single portable analyzer test of stack emissions, to obtain a higher fuel use limit as well as an assumed corrected fuel consumption data and a higher design heat input rate on the IC compressor engine. This request was not acted on by EPA Region 6.

On June 2, 2006, an administrative amendment to the Title V permit was made, in response to a June 15, 2006 request from Williams Field Services, to change the responsible official and plant contact information.

On September 28, 2006, an Administrative amendment to the Title V permit was made, in response to a September 14, 2005 request from Williams Field Services to change the name of the permitted owner to Williams Four Corners LLC.

On May 19, 2008, EPA Region 6 received a permit application to renew the Title V permit, dated May 12, 2008. The application was deemed administratively complete on July 11, 2008. The application requested an increased fuel use limit and higher design heat input rate in the IC engine, based on the single portable analyzer test done in 2004. This request was similar to the one made to EPA Region 6 in 2004.

On September 30, 2009, EPA Region 6 issued the Williams Four Corners LLC Los Mestenos final Title V permit, with effective date of October 30, 2009, after responding to public and company comment.

On October 30, 2009, Williams Four Corners LLC notified EPA Region 6 they had filed a petition with EPA's Environmental Appeals Board (EAB) to review the permit for compliance with requirements under the CAA, with specific emphasis on the testing requirements, with requests to modify or eliminate the testing.

On November 20, 2009, members of Williams Four Corners and EPA Region 6 met to discuss options related to the testing requirements in the final permit for Los Mestenos.

On January 27, 2010, both EPA Region 6 and Williams Four Corners agreed upon

modified testing language for the units to provide flexibility in times of shutdown or little utilization, clarified testing parameters, and corrected some testing, reporting, monitoring requirements. The agreed upon changes were incorporated into the revised Title V permit (Permit No. R6NM-04-10R1M1), issued on April 1, 2010, and the EAB petition was withdrawn.

On September 25, 2014, EPA Region 6 received a permit application to renew the Title V permit, dated September 18, 2014. The application was deemed administratively complete. The renewal proposes a continuance of operations, correction of emission rates, incorporation of the replacement overflow tank T-2, and the addition of existing emissions related to maintenance, startup, and shutdown (MSS) activities.

e. Potential to Emit (PTE)

General: Table 2 includes the potential to emit data provided by Williams Four Corners LLC (WFC). Potential to emit means the maximum capacity of the Williams Los Mestenos Compressor Station to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the Los Mestenos Compressor station to emit an air pollutant, including air pollution control equipment and restrictions on hours of operations or on the type or amount of material combusted, stored, or processed, may be treated as part of its design if the limitation is enforceable by EPA. Potential to Emit is meant to be a worst case emissions calculation, but is not meant to be a worst case single emission calculation alone. The Potential to Emit represents the maximum operating range of the source units at design specifications and operational design (reflective of representative normal operating conditions, to include periods of startup and shutdown) through years of verifiable data. Actual emissions may be much lower. The PTE numbers in Table 2 represent the upper limits of emissions for purposes of determining minor and major NSR applicability.

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 Nation. The Potential to Emit provided in the permit as well as in this Statement of Basis is for informational purposes only, except where specifically noted as limited (See Table 4 below). However, the 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, to ensure that future changes to the source do not trigger federal CAA requirements.

PTE for Internal Combustion Engine (Unit No. 2): A requirement was placed in the previous Title V permit to conduct a quarterly compliance test for one year, within 2 months of the effective date of the permit, for the IC engine (Unit 2) to verify compliance with all other recalculated PTEs for the IC engine, and for the PTEs for all pollutants source-wide for all units, plus safety factors, along with individual limitations without

safety factors. A condition was additionally placed in the permit to retest to verify results, should the tests show either a greater than insignificant increase (> 2 tpy) or greater than 10% decrease from proposed PTE for this unit and the source-wide estimates in the resultant permitting action, and reapply for modification to the permit if the difference is an increase in emissions.

Through the efforts of EPA and Williams during the 2010 Title V permit application review, the emissions and operational parameters for the Caterpillar G-399-TA reciprocating engine (Unit No. 2) were established at a limit on the maximum heat input rate of the IC engine at 6.9 MMBtu/hr, in addition to the fuel usage rate limit of 46 mmscf/yr. This included the review of manufacturer's specifications, historical emissions testing, past semi-annual reports and emissions inventories, as well as records from the Bureau of Land Management (BLM) and Oklahoma Corporation Commission (OCC), which keeps track of significant natural gas and oil production pipeline statistics. The results of this effort, and the results of the subsequent emissions testing required in the current Title V permit, are used in this renewal application to establish PTE emissions and fuel consumption limits. A summary of the quarterly compliance test conducted in 2010 are found in Table 1A and the proposed limits.

PTE for the Solar Turbine (Unit No. 1) and Tanks T-1 and T-2: The natural gas fired Solar Saturn 122 Turbine (Emissions Unit No. 1) is subject to emission limitations provided in Table 7 below. From information submitted by WFC, Unit No. 1 has had no physical or operation changes which may increase the emission rate of the unit beyond its operational capacity, and the heat input rate of the unit per manufacturer's specifications is 10.84 MMBtu/hr. The NO_x, CO and VOC emission limits that are proposed for this Title V permit will remain the same and were taken from the previous applications and permits. Since turbine emissions are extensively documented and reliable, the performance test combined with proper operation and maintenance of the turbine according to the manufacturer's recommendations should be sufficient to ensure compliance with the required emission limitations and permit representations. A summary of the compliance test conducted in 2010 may be found in Table 1B. Particulate matter will not be a required testing parameter for the performance test, as there is longstanding documentation in the industry for gas fired units, that this emission is insignificant for both turbines and the IC engines. Also, permit records, through annual compliance reports, show this source has insignificant amounts of PM emissions. WFC has provided EPA Region 6 with annual estimates of actual emissions for all regulated pollutants for fee payment purposes and annual compliance reports for the current Part 71 permit. WFC will 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 Title V permit), and annual compliance certifications and reports.

The PTE, as represented in the Title V permit, is set for informational purposes, except with respect to the Turbine emissions, and to meet applicable requirements. Reductions of those PTEs are appropriate, per the data provided by compliance reports, fee

schedules, manufacturer’s data, and NAAQS screening and modeling. Therefore, Region 6 has set a reasonable 10% safety factor on the recalculated PTE for CO and VOC, and 10% for fuel usage for combustion sources, and no safety factor on the flash tank and fugitive emissions, to equal emissions represented in Table 2.

Table 1A: Unit 2 Caterpillar G-399-TA Summary of Testing and Proposed Emissions

Compliance Test Date	Testing Protocol	NOx (lb/hr)	CO (lb/hr)	VOC (lb/hr)	Formaldehyde 1 (lb/hr)	Maximum hp during test
5/11/2010	EPA Method test	18.8	2.7	0.1	0.12	598
5/11/2010	Portable analyzer	22.88	2.61			
8/31/2010	EPA Method test	17.4	3.7	0	0.29	581
12/10/2010	EPA Method test	21.6	3.8		0.12	619
Based on the maximum test result lb/hr converted to tpy		100.2	16.6	.4		
Current Permit pte, tpy		153	107	2.9		
Tested vs. PTE, %		65%	16%	15%		
Test results +10% safety factor		110.2	18.3	.5		

Propose to reduce NOx and CO to max test rate + 10 % per SOB, but leave VOC as permitted

Proposed Emission Rates:	NOx	CO	VOC
	110.2	18.3	2.9

Table 1B: Unit 1 Solar Saturn 1200, Summary of Test Results (5/11/2010)

Run #	NOx (tpy)	CO (tpy)	VOC (tpy)	Formaldehyde(tpy)	Maximum hp during test
1	12.6	3.8	0	.6	1151
2	12.6	3.9	0	.3	1151
3	12.5	3.9	0	.1	1151
Average	12.6	3.9	0	.3	1151
Portable Analyzer	15.2	1.6	N/A	N/A	1151

Table 2: Potential to Emit in Tons per Year (tpy) for Williams Four Corners LLC, Los Mestenos Compressor Station (See Table 6 for applicable enforceable limitations on PTE. (Only the unregulated PTE are for informational purposes only)

Unit ID.	NOx	VOC	SO2	PM10	CO	Lead	HAP**
1, Solar Saturn 1200 Turbine, NGF	19.3 ¹	0.4 ¹	0.2	0.3	11.4 ¹	Negl.	0.4
2, Caterpillar G-399-TA, NGF Engine	110.2	2.9	0.2	0.6.	18.3	Negl.	0.3
3, T-1, Fixed roof storage tank ³	N/A	84.2	Negl.	Negl.	N/A	N/A	7.9
4, T-2, Fixed roof storage tank ⁴	N/A	2.0	N/A	N/A	N/A	N/A	0.4

Unit ID.	NOx	VOC	SO2	PM10	CO	Lead	HAP**
5, F-1 & F-2, FUGVOC Condensate Liquid Losses	N/A	4.5	N/A	N/A	N/A	N/A	0.1
6, MSS ⁵	N/A	14.9	N/A	N/A	N/A	N/A	0.5
TOTALS tpy	129.5 ²	108.9 ²	0.4	0.9	29.7 ²	Negl.	9.6

** - mostly formaldehyde and n-Hexane

¹ Regulated emissions PTE (see Table 4)

² Source-wide PTE as combination of regulated and unregulated source PTEs

³ Emissions from the condensate tank T-1 are calculated using TANKS 4.09d for working/breathing losses and using VMGSim for flash emissions. These emissions have been updated with the new tank capacity.

⁴ Tank T-2 is a replacement tank which operates as an overflow tank for T-1 and will only have working and breathing losses.

⁵MSS emissions include, but are not limited to, routine or predictable startups, shutdowns and scheduled maintenance from the turbine and engine driving the compressors, and from the associated piping.

NOx - nitrogen oxides

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))

NGF - natural gas fired

Table 3. Change in Emission Pollutant Versus Total Emissions (tons/year) for Regulated Units and Unregulated Units

Pollutant	Total Emissions, tons/year	Total Emissions, tons/year	Total Emissions, tons/year
	Current Permit	Proposed Permit	Proposed Change
NOx	172.3	129.5	-42.80
SO ₂	Neg	0.4	+0.4
CO	118.4	29.7	-88.7
PM ₁₀	NA	NA	NA
VOC	183	109	-74
Lead	NA	NA	NA
HAPs	11.1	9.6	-1.5

*Change in emissions for NOx includes the regulated unit limitation.

f. Emission Units and Emission Generating Activities

40 CFR Part 71 allows sources to separately list (in the Title V 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. See 40 CFR 71.5(c)(11). Units that qualify as “insignificant” for the purposes of the Title V permit application are in no way exempt from applicable requirements or any requirements of the Title V permit. In its permit application, WFC listed the emission units shown in Table 4 as meeting the criteria in 40 CFR 71.5(c)(11)(ii) for insignificant emission levels. The permit includes a permit condition requiring the permittee to maintain reliable data and records for the duration of the permit which demonstrate that each such emission unit meets the exemption criteria. WFC should also maintain documentation for any equipment changes that do not trigger minor NSR permitting requirements and should submit the appropriate title V permit amendment request to EPA to memorialize the changes.

At the Los Mestenos Compressor Station, the following emission units are insignificant based on their calculated emission rates:

Table 4. Insignificant Emission Units

Emission Unit ID No.	Unit Description	Size	Exemptions to Federal Requirements
IEU 3	Fuel Gas Heater	0.3 MMBtu/hr	< 2 tpy 40 CFR § 71.5(c)(11)(ii)
IEU 4	Heater	0.3 MMBtu/hr	< 2 tpy 40 CFR § 71.5(c)(11)(ii)
IEU F-2	Truck Loading	Max usage 2416 gal/day	< 2 tpy 40 CFR § 71.5(c)(11)(ii)
IEU T-3	Produced Waste Water Storage Tank	70-bbl	< 2 tpy 40 CFR § 71.5(c)(11)(ii)
IEU T-4	Lube Oil Storage Tank	500-gallon	< 2 tpy 40 CFR § 71.5(c)(11)(ii)
IEU T-5	Used Oil Tank	500-gallon	< 2 tpy 40 CFR § 71.5(c)(11)(ii)
IEU T-6	Ambitrol Tank	350-gallon	< 2 tpy 40 CFR § 71.5(c)(11)(ii)
IEU T-7	Methanol Tank	500-gallon	< 2 tpy 40 CFR § 71.5(c)(11)(ii)

Williams Four Corners LLC, Los Mestenos Compressor Station provided the information contained in Table 4 in their permit application. All emission units at this facility, except for those insignificant units listed above, are identified in Table 5 below.

Table 5. Emission Units and Control Devices

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
1	Turbine SC-7895681	Solar Saturn 1200 10.84 MMBtu/hr	1136 hp 1200 hp	1989 ¹	Compressor drive	None
2	I/C Engine 49-C-200	Caterpillar G-399-TA 7.4 MMBtu/hr (6.9 MMBtu/hr local)	598 hp 750 hp	06/12/90	Compressor drive	None
T-1	Condensate Storage Tank 25428	Permian Tank N/A N/A	490 bbl ³	Unknown ²	Storage tank	Fixed roof

T-2	Condensate Storage Tank 831-2918	American Tank and Steel N/A N/A	400 bbl	2014 ³	Storage tank	Fixed roof
F-1 and F2	Valves, Flanges, Seals, Condensate Liquid Loading losses, etc. Unknown	N/A	N/A	Unknown	Piping component fugitive emissions	None
MSS	Maintenance, Startup, and Shutdown Emissions	N/A	N/A	None	Maintenance, Startup, and Shutdown Emissions	None

¹ Per records from original Streamline and General Compressor Permit Application and Notice of Intent to construct, Unit 1 was constructed and shipped by the Gas Co. of NM (GCNM) in July 1979, but was not installed at Los Mestenos until 1989.

² Manufacture date was 1993.

³ Manufacture date was 1965.

g Modeling:

No modeling is required as a result of this permit action. This Title V permit renewal action does not independently authorize any construction or change to the method of operation from the previously completed modeling results.

5. Applicable Requirements and Limitations:

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 6: Applicable Regulations: Williams Four Corners LLC, Los Mestenos Compressor Station Citation	Requirement	Comment
40 CFR Part 71	Federal Operating Permits Program	
40 CFR Part 60, Subpart A	General Provisions	
40 CFR Part 60, Subpart GG	Stationary Gas Turbines	<p>40 CFR 60, Subpart GG are applicable to all stationary gas turbines with a heat input at peak load equal to or greater than 10 MMBtu per hour which commenced construction, modification, or reconstruction after October 3, 1977 is subject to the requirements of this part.</p> <p>Unit 1 has a heat input equal to 10.84 MMBtu per hour which is greater than 10 MMBtu per hour threshold. Although constructed in 1979, this unit was installed at the facility in 1989, both of which dates are after the October 3, 1977 applicability date. Therefore, this turbine is subject to any applicable regulations for the turbine’s classification as it regards to emission and operating limitations; testing and initial compliance requirements; continuous compliance requirements; notifications, reports and records; and any other applicable requirements or information required in the subpart for this turbine classification.</p>
40 CFR 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT)	<p>40 Part 63, Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from existing, new, modified and reconstructed stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. The regulation contains provisions for initial and continuous compliance demonstration.</p> <p>The facility is an area source of HAP, as defined under the regulation. Under §63.6590(a)(2)(iii), a RICE located at an area source of HAP is a new or reconstructed unit if it is constructed or reconstructed on or after June 12, 2006. Those constructed or reconstructed prior to this date are existing units.</p> <p>Unit 2 was constructed in 1990 and is classified as an existing non-emergency, non-black start 4SRB RICE greater than >500 HP remote stationary RICE operations greater than 24 hours per calendar year and is subject to the any applicable requirements for this RICE engine classification emission and operating limitations; testing and initial compliance requirements; continuous compliance requirements; notifications, reports and records; and any other applicable requirements or information required in the subpart for this engine classification</p>

The Williams Four Corners LLC, Los Mestenos Compressor Station application was reviewed for

compliance with the Part 71 Operating Permit Program, and all Federal applicable requirements. Based on the information provided by Williams Four Corners LLC in their application, the Los Mestenos Compressor Station would be subject to the following specific permit requirements for the Solar Saturn 1200 Turbine, Unit No. 1, per applicable requirements under 40 CFR Part 60, Subpart GG:

Table 7: Maximum Allowable Emission Rates

Unit No.	Unit Name	Hours of Operation (hr/yr)	NOx	CO	VOCs
1	Solar Saturn 1200 Turbine 1200 hp	8760	4.4 lb/hr 19.3 tpy	2.6 lb/hr 11.4 tpy	0.09 lb/hr 0.4 tpy

Other Applicable Requirements

Based on the information provided in the Williams Four Corners LLC application, EPA has no evidence that this source is subject to any existing federally applicable programs for emission controls, other than those identified above. Federal CAA programs include Prevention of Significant Deterioration, New Source Performance Standards, National Emission Standards for Hazardous Air Pollutants, and the acid rain program under Title IV of the CAA. Further, Williams Four Corners LLC Los Mestenos Compressor Station is not subject to any implementation plan, as exist within State jurisdictions. Therefore, Williams Four Corners LLC Los Mestenos Compressor Station is not subject to any substantive requirements that control its emissions under the CAA, beyond identified NSPS and NESHAP requirements and collection and recordkeeping to provide materials that substantiate existing permit requirements.

a. Fuel Usage Rates:

The fuel type used at this facility is natural gas. The maximum annual usage rate stated in the application for these emissions units is:

- Unit No. 1 - 99.9 mmscf/year;
- Unit No. 2 - 46 mmscf/year.

b. Heat Input and Operating Range:

The maximum adjusted design heat input for the IC engine (Unit No. 2) is 6.9 MMBtu/hr, and the maximum design heat input for the turbine (Unit No. 1) is 10.84 MMBtu/hr, based on the information presented in the application. The actual (average) heat input will not exceed the maximum design heat input for the IC engine. A monitoring/recordkeeping/reporting requirement has been placed in the permit on this requirement.

c. Fuel Usage:

Fuel fired in the turbine (Unit No. 1), and all other combustion units at this source, including the IC engine (Unit No. 2), and heaters is limited to sweet natural gas of pipeline quality containing a maximum of 0.25 grains of H₂S per 100 cubic feet.

d. Testing:

- (1) Pollution control equipment installed at this facility will be maintained and tested per the requirements and compliance measures of 40 CFR Part 60, Subparts A and GG.
- (2) NSPS compliance testing:
 - (i) Compliance tests may be required by EPA for nitrogen oxides (NO_x) and sulfur dioxide (SO₂) for the turbine (Unit No. 1), to demonstrate compliance with 40 CFR Part 60, Subpart GG for permit requirement 4.1.
 - (ii) Compliance tests may also be required by EPA to determine actual emission rates from any other point for which an emission test method is established.
 - (iii) When testing is required, the tests shall be conducted in accordance with EPA Reference Methods contained in the 40 CFR Part 60, Appendix A, and with the requirements of Subpart A, General Provisions, 40 CFR § 60.6(f).
 - (iv) Tests shall be conducted within ninety (90) days of written notice from EPA that a test is required.
 - (v) NO_x and percent oxygen (O₂) will be tested using EPA Reference Method 20 of 40 CFR Part 60, Appendix A, and SO₂ will be tested using one of the approved ASTM reference methods specified in the permit for the measurement of sulfur in gaseous fuels, or an approved alternative method.
 - (iv) The permittee will comply with all pre-test notification and meetings, test protocol submission, and EPA testing requirements, along with applicable post-test reporting, as noted in applicable sections of the draft permit.

e. Monitoring and Recordkeeping:

The permittee will comply with all applicable NSPS monitoring, recordkeeping, and reporting requirements, and will be required to monitor and keep the following records:

- (1) 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.

- (2) The permittee will comply with all applicable NSPS monitoring, recordkeeping, and reporting requirements, as specified in 40 CFR § 60.334 – Monitoring of Operations. 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.
- (3) In accordance with the custom schedule and approved alternative for monitoring requirements contained in 40 CFR § 60.334(b)(2), the permittee will comply with all applicable requirements of the fuel monitoring schedule (CFMS), approved by EPA on August 19, 1997, which are incorporated into the Title V permit.
- (4) Monthly and annual 12-month rolling average monitoring and recordkeeping of the fuel flow/consumption of the turbine and IC engine (Unit Nos. 1 and 2); and
- (5) Monthly monitoring and recordkeeping and semi-annual average recordkeeping of the actual heat input rates for the IC engine (Unit No 2).

f. Reporting:

- (1) An annual report will be submitted to the EPA Region 6 office by the permittee. The report will contain the following:
 - (i) Hours of operation of the facility;
 - (ii) The calculated annual emissions for the pollutants listed in Table 2 above;
 - (iii) The monthly and annual 12 month rolling averages of the fuel flow/consumption of the turbine and IC engine;
 - (iv) The monthly monitoring and semi-annual averages of the actual heat input rate for the IC engine; and
 - (v) 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.

- (2) Any other applicable compliance reports, per 40 CFR Part 60, Subpart GG.

6. 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 or limitations.

7. Notice and Comment

a. Public Notice.

As described in 40 CFR § 71.11(a)(5), all Title V (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 a person would like to be added to the mailing list to be informed of future actions on these or other CAA permits issued in Indian Country, the notice instructs them to send their name and address to Erica Le Doux at the address listed below:

Air Permits Section
EPA, Region 6
1445 Ross Avenue (6MM-AP)
Dallas, TX 75202
E-mail: ledoux.eric@epa.gov

Public notice has also been published in a bi-weekly 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 Public Library 165 Hawks Drive Dulce, NM 87528	U.S. EPA, Region 6 Ave. 75202-2733	1445 Ross Dallas, TX
Rio Arriba County Phone #: (575) 759-1776	7122	Phone #:(214) 665-
	6435	or (214) 665-

Copies of the draft permit and this statement of basis are also available electronically on the EPA Region 6 Website, <https://www.epa.gov/caa-permitting/part-71-operating-permits-tribal-lands-epas-south-central-region>

Any interested person may submit written comments on the draft Part 71 operating permit during the public comment period to Erica Le Doux at the address listed in Section 7a 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 reasonably 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 Jeff Robinson, at the address listed in Section 7a 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.