

Attachment C4

From: [Oakley Hayes](#)
To: [LeDoux, Erica](#)
Cc: [Kaleri, Cynthia](#); [Puplampu, William](#)
Subject: RE: [EXTERNAL] RE: Los Mestenios Information
Date: Wednesday, August 31, 2022 2:28:41 PM
Attachments: [image001.png](#)
[image002.png](#)

Erica,

I uploaded another process flow diagram to the ftp site. Because the engine was disconnected from the process longer than 5 years ago, and under different ownership, Harvest doesn't have MOC records for when the unit was taken out of service. Instead, I have uploaded pictures of the engine inlet, outlet, and fuel gas lines showing that they are all disconnected and air-gapped, rendering the unit incapable of operation.

From: Oakley Hayes
Sent: Thursday, August 18, 2022 7:14 AM
To: LeDoux, Erica <LeDoux.Erica@epa.gov>
Cc: Kaleri, Cynthia <kaleri.cynthia@epa.gov>; Puplampu, William <puplampu.william@epa.gov>
Subject: RE: [EXTERNAL] RE: Los Mestenios Information

Thanks Erica. I will start digging around to see if I can locate those records

From: LeDoux, Erica <LeDoux.Erica@epa.gov>
Sent: Thursday, August 18, 2022 6:27 AM
To: Oakley Hayes <Oakley.Hayes@harvestmidstream.com>
Cc: Kaleri, Cynthia <kaleri.cynthia@epa.gov>; Puplampu, William <puplampu.william@epa.gov>
Subject: [EXTERNAL] RE: Los Mestenios Information

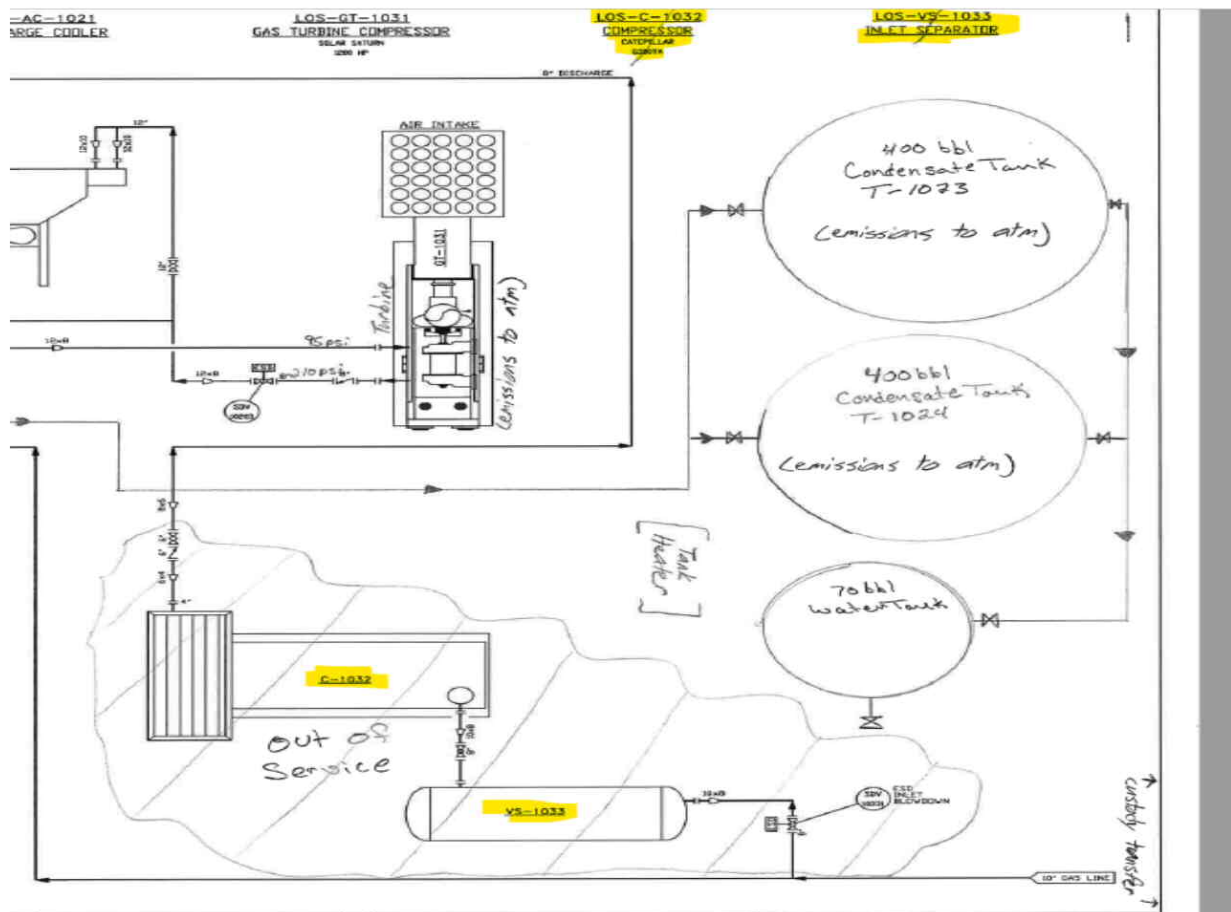
Hi Oakley,

I have downloaded all the information you uploaded to the FTP site. So far no problems with being able to open and view the documents.

I have just started my review of this material however I wanted to point out, if the Caterpillar engine is no longer in service and not operating, it should not be on the process flow diagram at all. I believe we discussed during our meeting. You have shaded it in and marked out of service, however it still appears to be connected. If it is no longer a part of this process facility, it should be removed from the drawing.

Also, Harvest will need to provide documentation (scope of work, MOC, etc.) demonstrating, that the Caterpillar RICE was taken out of service, connections dismantled, inoperable or removed. EPA required similar documentation when the engines at Ojito were inoperable after the fire. Although the Caterpillar may not be destroyed by fire, EPA requires documentation that the Caterpillar is no longer a viable option to operate at the facility.

Thank you, Erica



From: Oakley Hayes <Oakley.Hayes@harvestmidstream.com>

Sent: Wednesday, August 17, 2022 3:46 PM

To: LeDoux, Erica <LeDoux.Erica@epa.gov>

Cc: jnewby@cirrusllc.com

Subject: Los Mestenos Information

Hi Erica,

I have uploaded the documents responding to EPA's information request. Some of the bigger things to note:

- Harvest is removing its request to add the Waukesha engine to the permit, so no reciprocating internal combustion engine (RICE) will be operated at the site
 - This reduces emissions for SSM by removing the blowdown emissions associated with the proposed RICE unit
 - This reduces emissions for F1 by reducing the fugitive component count at the facility
- Harvest is adding pig launching and pig receiving emissions
 - Review of the facility drawings indicated that there is a pig launcher and pig receiver within a quarter mile of the facility
- Condensate flash emissions will be reduced
 - Review of the condensate analysis that was used in the model in the renewal application showed that a certain percentage of components were missing from the original analysis. The

modeler had initially assumed the missing percentage was water (it was actually heavier components). Harvest has obtained the original analysis (included in the submittal in the 2017-2021 *Los Mestenos Liquid Analyses*) from the lab and re-ran the model with the corrected inputs. The model was ran using the same throughput of 22,141 barrels.

- T1 working and breathing emissions and L1 emissions will change
 - Harvest initially indicated T1 had a capacity of 490 barrels
 - The nameplate of the tank shows that the capacity is actually 400 barrels
 - The TANKS 4.0 model for T1 was re-ran which affects both T1 and L1 emissions
- Emission unit 5 emissions will decrease
 - Harvest initially indicated that this unit was rated at 0.3 MMBtu/hr
 - The nameplate shows that this unit is actually rated at 12,000 Btu/hr or 0.012 MMBtu/hr

Because of all the substantial changes, Harvest will submit a revised application with all of the data contained in a single document by 9/2/2022. An updated PTE summary for the facility was provided in the upload for reference. All supporting documentation will be provided in the updated application. I will be out of the office next week (8/22 – 8/26), but if you have any questions, please email me and I will do my best to respond as quickly as possible.

Regards,

Oakley Hayes

Environmental Specialist

Harvest Midstream Company

Office: 505-632-4421 Cell: 970-903-3203



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