



Environmental Department 188 County Road 4900 Bloomfield, NM 87413 505/632-4625 505/632-4781 Fax

July 9, 2003

Mr. Carl E. Edlund, P.E. Director, Multimedia Planning and Permit Division U.S. EPA Region 6 1445 Ross Avenue, Suite 1200 Dallas, TX 75202-2733

Mr. Guy Donaldson, 6PD-R U.S. EPA Region 6 1445 Ross Avenue, Suite 1200 Dallas, TX 75202-2733

re:

Part 71 Operating Permit R6FOPP71-04 Williams Field Services' Los Mestenios Compressor Station

Dear Sirs,

Thank you for the opportunity to comment on the Statement of Basis and draft permit R6FOPP71-04 for Williams Field Services' Los Mestenios Compressor Station, located within the exterior boundaries of the Jicarilla Apache Reservation in Rio Arriba County, New Mexico. We would like to offer the following comments:

# **Statement of Basis**

Paragraph 3.d notes that "this source is subject to the provisions of EPA permit NM-791-M2..." Prior to the determination that facilities within the exterior boundaries of a tribal reservation fell within the jurisdiction of the EPA (or the tribal agency if a Tribal Implementation Plan was approved), this facility had been permitted through the New Mexico Air Quality Bureau as a minor source (not subject to PSD). Although Williams has accepted the permit issued by EPA for a PSD minor source (criteria pollutant emissions less than 250 tpy for a source not in the 28 source categories) as it came about during both the transition from State to Federal jurisdiction, and during a change of ownership, we wish to learn the statutory authority in issuing this minor source permit. Williams has complied with this permit, and will continue to comply with the requirements as incorporated into the draft operating permit, but we would like clarification on the issuance of the minor source NSR permit.

Paragraph 3.e, Table 1: Since submittal of this application, Williams has become aware of an undocumented source of emissions found at this facility. The application currently lists VOC emissions from condensate tank Tk-1 that result solely from working and breathing losses. Williams has determined that flash emissions also occur from this tank, and wish to amend the application to incorporate these flash emissions. The VOC value in Table 1 should be 222 tpy, including both working and breathing losses, and flash emissions. The affected application forms plus tank flash emissions calculations are attached. Note that the Part 71 annual emissions fees paid in March 2003 included these tank flash emissions.

Paragraph 4 typographic correction: NSR permit no. NM-971-M2 should be NM-791-M2.

Paragraph 4.c requires monthly recordkeeping of fuel flow/consumption for emission units 1 and 2 without citing an applicable regulation. If this is a new requirement without a regulatory driver, Williams would suggest changing this fuel flow recordkeeping requirement to an hours of operation recordkeeping requirement consistent with the existing NSR permit.



USEPA-Region 6: Multimedia Planning & Permitting Los Mestinos Draft Title V Permit Williams Energy Service

<u>Paragraph 6.a</u> states that public notice has been published in a bi-weekly newspaper of general circulation. We understand that this newspaper was the Jicarilla Times. What was the date of publication?

### Draft Permit R6FOPP71-04

Condition 1.1: Responsible Official's address and phone number should be:

Mr. Jeff Baumer Director, Four Corners Area Williams Field Services One Williams Center MD WRC 3-7 Tulsa, OK 74172 (918) 573-9720

Condition 1.1: Standard Industrial Code (SIC) should only be 1389.

Condition 1.1: Description of Process should be "Williams Field Services' Los Mestenios Compressor Station, with SIC 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 contractual basis as a service to the natural gas producers."

Condition 1.2 Table 2: The VOC value in Table 1 should be 222 tpy, including both working and breathing losses, and flash emissions. See comment SOB Paragraph 3.e Table 1, above.

Conditions 3.2.5, 3.2.6 and 3.2.9.1: pending resolution of comment SOB Paragraph 4.c, above, the monitored parameter in these conditions should be changed from fuel flow to hours of operation.

Condition 3.2.7: Typographical error: - the last sentence should reference condition 3.2.9.

Condition 3.2.9: Orphan phrase or typographical error at the end of this condition "every six months permit issuance."

Condition 3.2.9: Williams would suggest changing the submittal date deadline of the semi-annual report to "within 45 days following every six months from the date of issuance of this permit" to allow the semi-annual report to cover the affected six-month period.

Condition 5.3: Williams would suggest changing the submittal date deadline of the annual certification of compliance to "annually, within 45 days of the anniversary date of issuance of this permit" to allow the certification to cover the one-year period up to the anniversary date.

Again, thank you for the opportunity to comment on this draft permit. Please email or call if you have any questions.

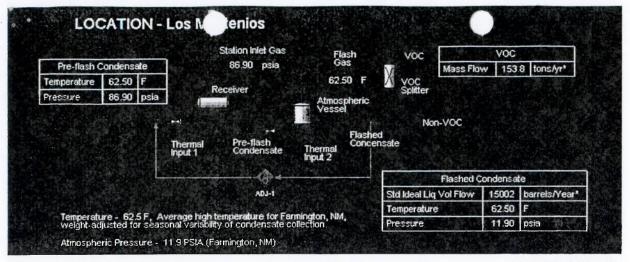
Respectfully submitted,

Michael K. Lane, PE Environmental Specialist

Michael.K.Lane@Williams.com

Xc: WFS file 140

Encl:



**HYSYS Model Results** 

Location: Los Mestenios Compressor Station

2002 Condensate Volume (post-flash):

15,002 bbls

2002 VOC Emissions: 153.8 Tons

	Pre-flash	Flashed			VOC w/40%
Name	Condensate	Condensate	Flash Gas	voc	Safety Facto
Vapour Fraction	0.0	0.0	1.0	1.0	
Temperature [F]	62.5	62.5	62.5	75.0	
Pressure [psia]	86.9	11.9	11.9	11.2	
Molar Flow [MMSCFD]	4.936E-02	4.115E-02	8.210E-03	5.591E-03	
Mass Flow [tons/yr*]	2001.7	1816.4	185.2	153.8	215.35
Liquid Volume Flow [barrels/Year*]	17,055.2	15,002.0	2,053.2	1,532.5	DESA SHAROLATON - SISE DIGINO
Molecular Weight	84.26	91.71	46.88	57.16	
Name	Pre-flash Condensate	Flashed Condensate	Flash Gas	Tons of VOC (calculated)	Tons of VOC
Comp Mass Frac (CO2)	0.00035	0.00002	0.00351	na	na
Comp Mass Frac (CO2) Comp Mass Frac (Nitrogen)	0.00000	0.00002	0.00000	na	na
Comp Mass Frac (Nethane)	0.00391	0.00009	0.04135	na	na
Comp Mass Frac (Ethane)	0.01316	0.00178	0.12473	na	na
Comp Mass Frac (Propane)	0.03949	0.01541	0.27559	51.05	71.47
Comp Mass Frac (i-Butane)	0.02248	0.01489	0.09698	17.96	25.15
Comp Mass Frac (n-Butane)	0.05384	0.04074	0.18229	33.77	47.27
Comp Mass Frac (i-Pentane)	0.05596	0.05264	0.08849	16.39	22.95
Comp Mass Frac (n-Pentane)	0.05658	0.05542	0.06797	12.59	17.63
Comp Mass Frac (2-Mpentane)	0.07274	0.07626	0.03821	7.08	9.91
Comp Mass Frac (n-Hexane)	0.05682	0.06046	0.02116	3.92	5.49
Comp Mass Frac (Mcyclopentan)	0.00000	0.00000	0.00000	0.00	0.00
Comp Mass Frac (Benzene)	0.01002	0.01069	0.00348	0.65	0.90
Comp Mass Frac (Cyclohexane)	0.04049	0.04344	0.01153	2.14	2.99
Comp Mass Frac (2-Mhexane)	0.14269	0.15494	0.02252	4.17	5.84
Comp Mass Frac (n-Heptane)	0.05350	0.05833	0.00615	1.14	1.60
Comp Mass Frac (Mcyclohexane)	0.00000	0.00000	0.00000	0.00	0.00
Comp Mass Frac (Toluene)	0.03978	0.04344	0.00383	0.71	0.99
Comp Mass Frac (2-Mheptane)	0.18069	0.19818	0.00917	1.70	2.38
Comp Mass Frac (n-Octane)	0.03318	0.03644	0.00117	0.22	0.30
Comp Mass Frac (E-Benzene)	0.00302	0.00332	0.00009	0.02	0.02
Comp Mass Frac (n-Xylene)	0.02555	0.02809	0.00063	0.12	0.16
Comp Mass Frac (ni-xylene)	0.00000	0.00000	0.00000	0.00	0.00
Comp Mass Frac (n-Nonane)	0.05598	0.06162	0.00063	0.12	0.16
	0.03979	0.04379	0.00051	0.09	0.13
Comp Mass Frac (Cumene)	0.00000	0.00000	0.00000	0.09	0.00
Comp Mass Frac (n-PBenzene)	0.00000	0.00000	0.00000	0.00	0.00
Comp Mass Frac (124-MBenzene)	0.0000	0.00000	0.0000	0.00	0.00
Comp Mass Frac (n-Decane)	0.00000	0.00000	0.00000	0.00	0.00
Comp Mass Frac (n-C11) TOTAL	1.00000	1.00000	1.00000		215.35

#### U.S. ENVIRONMENTAL PROTECTION AGENCY APPLICATION FOR FEDERAL OPERATING PERMIT, 40 CFR PART 71

#### FORM EMISS - EMISSIONS CALCULATIONS

INSTRUCTIONS: Use this form to calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section 1 of form GIS. If form FEE does not need to be submitted with the application, do not calculate actual emissions.

#### A. Emissions Unit ID TK-1

#### B. Identification and Quantification of Emissions

Instructions: First, list each air pollutant that is either regulated at the unit or present in major amounts. Second, list any other regulated pollutant (for fee calculation) emitted at the unit that have not already been listed. Each HAP added to the list in this step may be simply listed as "HAP". Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each listed air pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives, including those that do not count towards applicability, when calculating actual emissions. At a minimum, round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values. Attach examples of calculations that illustrates the methodology used.

	Emission Rates			
Actual Annual Emissions (tons/yr)	Potential to Emit			
(10.10 ).)	Hourly (lb/hr)	Annual (tons/yr)		
160.4	N/A	222.0		
0.66	N/A	0.91	71-43-2	
0.71	N/A	0.99	108-88-3	
0.02	N/A	0.02	100-41-4	
0.12	N/A	0.16	1330-20-7	
5.02	N/A	6.59	110-54-3	
	Annual Emissions (tons/yr)  160.4  0.66  0.71  0.02  0.12	Actual Annual Emissions (tons/yr)    Hourly (lb/hr)	Actual Annual Emissions (tons/yr)   Hourly (lb/hr)   Annual (tons/yr)     160.4   N/A   222.0     0.66   N/A   0.91     0.71   N/A   0.99     0.02   N/A   0.02     0.12   N/A   0.16	

# U.S. ENVIRONMENTAL PROTECTION AGENCY APPLICATION FOR FEDERAL OPERATING PERMIT, 40 CFR PART 71

# APPLICATION FORM GIS - GENERAL INFORMATION AND SUMMARY

Instructions: Complete this form once for the part 71 source (facility).

A.	Mailing Address and Contact Information
	Facility name Los Mestenios Compressor Station
	Mailing address: 188 County Road 4900
	City Bloomfield State NM ZIP 87413
	Contact person: Michael Lane Title Environmental Specialist
	Telephone ( 505 ) 632 - 4625 Ext
В.	Facility Location
	Temporary source? Yes X No Plant site location Sections 25 & 26, Township 26N, Range 5W (UTM Zone 13, 292.2 km east, 4036.5 km north)
	City 24 kilometers northwest of Gavilan State NM County Rio Arriba  EPA Region 6 Is the facility located within:
	Indian lands? X YES NO OCS waters? YES X NO
	Nonattainment area? YES _X _NO If yes, for what air pollutants?
	Within 50 miles of affected State? X YES NO If yes, What State(s)? Colorado
c.	Owner
	Name Williams Field Services Company Street/ P.O. Box P.O. Box 21899
	City         Tulsa         State         OK         ZIP           74121         -         1899
	Telephone ( 918 ) 573 - 2000 Ext
D.	Operator
	Name Williams Field Services Company Street/ P.O. Box 188 County Road 4900
	City         Bloomfield         State         NM         ZIP           87413         -
e10-	Telephone (505 )6324600 Ext

₹.	Application Type
	Instructions: Mark only one permit application type and answer the supplementary question appropriate for the type marked.
	X Initial Permit Permit Renewal Significant Mod.  Minor Permit Mod. (MPM)
	Group Processing, MPM Administrative Amend.
	For initial permits, when did operations commence?11/15/79
	For permit renewals, what is the expiration date of the existing permit?
	Applicable Requirement Summary
	Instructions: Mark all applicable requirements that apply.
	SIP X_ FIP/TIP PSD Nona ttai nmen t
	NSR NSR
	X Minor source NSR X Section 111 Phase I acid rain Phase II acid rain
	Stratospheric ozone OCS regulations NESHAP Sec. 112(d) MACT
	Sec. 112(g) MACTEarly reduction of HAP Sec. 112(j) MACT RMP [Sec.112(r)]
	Tank vessel reqt., section 183(f) Standards/Reqts.
	Consumer/ commercial prod. reqts., section 183(e) NAAQS, increments or visibility (for temporary sources)
	Has a risk management plan been registered? YESX NO Regulatory agency
	Has a phase II acid rain application been submitted? YES _X NO Permitting authority
•	Source-Wide PTE Restrictions and Generic Applicable Rquirements Instructions: Cite and describe (1) any emissions-limiting requirements that apply to facility as a whole, and (2) "generic" applicable requirements that apply broadly or in identical fashion to all sources at the facility.
on	e

H. Process Description

Instructions: List all processes, products, and SIC codes for normal operation, in order of priority. Also list any process, products, and SIC codes associated

with any alternative operating scenarios, if different from those listed for normal operation

Process	Products	SIC	
Natural gas compression	Natural gas	1389	

## I. Emission Unit Identification

Instructions: Assign an emissions unit ID and describe each significant emissions unit at the facility. Control equipment and/or alternative operating scenarios associated with emissions units should by listed on a separate line. Applicants may exclude from this list any insignificant emissions units or activities.

Emissions Unit ID* Description of Unit						
1	Solar Saturn 10-T1200 Turbine					
2	Caterpillar G-399TA reciprocating engine					
TK-1	500-bbl condensate storage tank					
F-1	Process piping components fugitive emissions					

<sup>\*</sup> Refer to attached simplified flow diagram.

J.	Facility Emissions S	ummary					
	<pre>air pollutant list greatest amount an may be indicated b actual emissions f</pre>	ed below. End its PTE. For entering "wo or fee purpos	ter the or all ajor" i es for	name of the pollutants in the space	he single HAP e stipulations t e for PTE. Ind ty in the space	emitted in the control of the court of the c	e ce status tal
	Instructions: Enter potential to emit (PTE) for the facility as a whole for each air pollutant listed below. Enter the name of the single HAP emitted in the greatest amount and its PTE. For all pollutants stipulations to major source statumay be indicated by entering "major" in the space for PTE. Indicate the total actual emissions for fee purposes for the facility in the space provided. Applications for permit modifications need not include actual emissions information NOx 83 tons/yr VOC 228 tons/yr SO2 neg. tons/yr  PM-10 neg. tons/yr CO 239 tons/yr Lead N/A tons/yr  Total HAP 10 tons/yr  Which single HAP emitted in the greatest amount? n-Hexane PTE? 6.6 tons/yr  Total emissions of regulated pollutants (for fee calculation) from section F, line of form FEE? 246 tons/yr  (from 2002 Emissions Inventory and Annual Fee).  Existing Federally Enforceable Permits:  Permit number(s) NM-791-M2 Permit type Authorization to construct ermitting authority EPA Region 6  (RPA Region 6 issued this permit to an NSR minor source [PTE = 239.5 tpy CO] on eptember 24, 1996)  Emission Unit(s) Covered by General Permits N/A  Emission unit(s) subject to general permit						
	PM-10 neg.	tons/yr	co	239	tons/yr		N/A
	Total HAP 10	_tons/yr					
				greatest a	mount?n-Hex	ane	PTE?
			llutant	(fro	m 2002 Emission		
ĸ.	Existing Federally En	forceable Per	mits:				
	mitting authority <u>EPA</u> (EPA Region 6 issue	Region 6					on
L.	Emission Unit(s) Cove	red by Genera	l Permi	ts N/A			
	Emission unit(s) s	ubject to gen	eral pe	rmit			
	Check one:	×	Ap	plication m	nade	Coverage	granted
	Instructions: Enter air pollutant listed greatest amount and i may be indicated by e actual emissions for Applications for perm NOx 83  PM-10 neg.  Total HAP 10 t Which single H 6.6  Total emissions of re of form FEE? 246  C. Existing Federally Enfor Permit number(s) NM-Permitting authority EPA Recomplete (EPA Region 6 issued to September 24, 1996)  C. Emission Unit(s) Covered Emission unit(s) subjusted to Check one:  General permit identifications of the control of	ntifier		Exp	piration Date	//	
м.	Cross-referenced In	ructions: Enter potential to emit (PTE) for the facility as a whole for each pollutant listed below. Enter the name of the single HAP emitted in the test amount and its PTE. For all pollutants stipulations to major source status be indicated by entering "major" in the space for PTE. Indicate the total all emissions for fee purposes for the facility in the space provided. ications for permit modifications need not include actual emissions information  83					

Does this application cross-reference information?  $\underline{X}$  YES  $\underline{\hspace{1cm}}$  NO (If yes, see instructions) EPA Permit NM-791-M2

U.S. ENVIRONMENTAL PROTECTION AGENCY APPLICATION FOR FEDERAL OPERATING PERMIT, 40 CFR PART 71

FORM PTE - POTENTIAL TO EMIT SUMMARY

INSTRUCTIONS: Complete this form once for the facility. You may find it helpful to complete form EMISS for each emissions unit before completing this form. For each emissions unit with emissions that count towards applicability, list the emissions unit ID and the PTE for the air pollutants listed below. If there are other air pollutants not listed below for which the source is a major source, provide attachments naming the air pollutant and showing calculation of the total for that pollutant. Round values to the nearest ton. Add all values together in each column and enter the total in the space provided at the bottom of the table. Also report these totals in section J of form GIS.

Emissions Unit ID	Regulated	Air Pollu	tants and P	ollutants f	or which th	e Source i	s Major
	NOx (tons/y r)	VOC (tons/y r)	SO2 (tons/y r)	PM10 (tons/y r)	CO (tons/yr	Lead (tons/y r)	HAP (tons/y r)
1	19.4	0.4	neg.	neg.	11.4	N/A	0.4
2	63.1	2.6	neg.	neg.	228.0	N/A	0.5
TK-1	N/A	222.0	N/A	N/A	N/A	N/A	8.67
F-1	N/A	3.2	N/A	N/A	N/A	N/A	0.1
							<del>Valent</del>
## - HV							
						77.70	

Note: neg. = negligible (less than 0.01 ton/year)

83

228

neg.

neg.

239

N/A

10

TOTALS