ATTACHMENT 6

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

September 29, 2009
STATEMENT OF BASIS

For draft Air Pollution Control Title V Permit to Operate for Permit Renewal No. R6NM-04-09R1 (replaces R6FOPP71-04).

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 Mestenios 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 Indian country, 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 (and Associated Construction Permit)

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

a. Remove Section 5 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. Future construction activities will be handled under a separate permitting action and any consultation requirements under the Endangered Species Act will be addressed at that time.

b. Incorporate all applicable requirements from previous NSR permit, NM-791-M2, issued by EPA Region 6. Conform specific testing/monitoring/reporting requirements with the Title V requirements under 40 CFR § 71.6.

c. Include language in public notice to permit to cancel permit NM-791-M2 upon effective date of this Title V permit renewal.

d. Remove 40 CFR Part 63, Subparts A and HH applicability references from the Title V, as they are not "applicable requirements."

e. Update fuel use limit for Caterpillar internal combustion (IC) engine (Unit No. 2) to 46 mmscf/yr.

f. Update maximum heat input rating for Caterpillar IC engine (Unit No. 2) to 6.9 MMBtu/hr (adjusted for local elevation).

g. Update serial number of Caterpillar IC engine (Unit No. 2) from "49-C-284" to "49-C-200".

h. Correct installation date in the current record (from "1979" to "1989"), update serial number for Solar Saturn Turbine (Unit No.1) from "30242 (sc-795681)" to "SC7895681", and update heat input rate of turbine to correctly reflect manufacturer's specifications.

i. Delete emission limits not derived from "applicable requirements," due to previous misapplication of certain NSPS or MACT requirements.

j. Increase facility-wide source unregulated Potential to Emit (PTE) NOx emissions to 184 tpy, decrease CO emissions to 158 tpy, and decrease VOC emissions to 183 tpy to finish updating changes from previous application and permitting actions, to reflect more accurate estimates of PTEs. Revise total source regulated PTE for NOx to 164.4 tpy. Revise individual unit PTEs accordingly.

k. Include a compliance test requirement in the renewed permit to verify compliance with PTEs.

l. Include the word "limitations" in Permit Condition 5.2 – Blanket Compliance Statement to reflect direct inclusion of limitations in the Title V permit.

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

n. 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).

3. The Jicarilla Apache Nation

Tribal Members:	3,136
Reservation population:	3,225
Acreage:	1,000,000
Checkerboard:	No
	Location: 160 miles northwest of Santa Fe
Address:	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 Jicarillas 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 Jicarillas 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 were the

first tribe in the United States to acquire and operate their own oil and gas production company."

c. Current Leadership: Levi Pesata , President
Ty Vicente, Vice 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: Cordel TeCube, Program Director
Danny Wells, Environmental Technician
(epojat@yahoo.com)
Phone: (575) 759-7421
Fax: (575) 759-7565

e. 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, NOx 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 Mestenios Compressor Station is located 24 KM Northwest of Gavilan, New Mexico at Lat: Lat: 36º 27' 11" N; Lon: 107º 19' 7" W

. The mailing address is:

Williams Four Corners, LLC
188 County Road 4900
Bloomfield, NM 87413

b. Facility Contact/Responsible Official

The facility contact is Mr. Aaron Dailey and the responsible official is Mr. Don Wicburg.

c. Description of Operations and Products

The Los Mestenios 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 compressed via turbine-driven and reciprocating-engine-driven natural gas compressors for injection into pipelines for transportation to the gas plant. The compressor engines are the Solar Saturn 1200 Turbine (Unit No. 1 with Serial No. SC7895681), and the Caterpillar G-399-TA IC engine (Unit No.2 with Serial No. 49-C-200). Emission Unit TK-1 is a fixed roof storage condensate storage tank with a 500 bbl capacity. The serial number on this unit is 25428. See Table 4 below for full description and range of operation of this equipment. It is expected that the source keep records of the serial numbers, and any change in serial number for each emission unit, and these changes should be reflected 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 Unit No. F-1 was 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

insignificant emission sources.

d. Permitting and/or Construction History

The Los Mestenios 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 obtain a Clean Air Act Title V Permit to Operate 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 Mestenios 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 Mestenios 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, at the expressed request of the permittee to establish regulatory compliance, per their initial request letter dated March 14, 1995. The request was to incorporate federally enforceable provisions into a construction permit, with a turbine subject to NSPS requirements under 40 CFR Part 60, Subpart GG. Emission limits for the source placed it just under the PSD major source threshold level (i.e., 250 tpy). The source applicability to NSPS remained, and the federally enforceable conditions were deemed by EPA Region 6 as necessary to maintain this source at emission levels less than 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-972-M2 were incorporated by reference.

On May 7, 2004, an Administrative amendment to the Title V and NSR permit was granted to a Willams Field Services request, 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, based on assumed corrected fuel consumption data, and a higher design heat input rate on the IC compressor engine. This request was not acted on by Region 6. See discussion on Changes to the IC engine in Subsection 4.e. below.

On June 2, 2006, an administrative amendment to the Title V 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 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 for Title V renewal, 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.

e. Potential to Emit

General: Table 1 includes the potential to emit data provided by Williams Four Corners, LLC. Potential to emit means the maximum capacity of the Williams Four Corners, LLC, Los Mestenios Compressor Station to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of Williams Four Corners, LLC 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.

According to the records supplied by the applicant, the Los Mestenios compressor station is subject to requirements of federal programs, under the New Source Performance Standards (NSPS). Requirements of the New Mexico State Implementation Plan (SIP) do not apply to this source, as it is located in Indian Country. As such, 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.

Changes: The Company updated its Potential to Emit in the most recent updated application sent to EPA on May 12, 2008. The Company has confirmed that the turbine (Unit No. 1) has had no physical or operation changes which may increase the emission rate of the unit beyond its operational capacity, although they have supplied an update to the heat input rate of the unit, per manufacturer's specifications from a previous 10.3 MMBtu/hr to a more specific 10.84 MMBtu/hr. The Company noted that the internal combustion (IC) engine (Unit No. 2) had been exchanged on May 18, 2001, prior to issuance of the Title V permit, which necessitates an update to the serial number of the unit in this action. The Company stated in the application that the existing unit is identical in performance and emissions ratings to the replaced unit, indicating there was no increase in the facility's PTE, based on operational capacity. However, further information on this replacement indicates this IC engine, while identical in model number, may not be identical in size, as no identifying information is available on the specific version of the model, per engine rating, horse power, or compression. Manufacturer's information on this model indicates there are 13 variations of this model, which result in widely varying emissions. A request to modify the fuel use limit and revision to the IC engine heat input rate, based on a portable analyzer stack test in 2004, was again requested in this application.

IC engine Fuel Use: The fuel use information from both the manufacturer, Fee Schedules, and Semi-annual compliance reports for representative years 2004 and 2005 [representative high rate years in the industry, per Bureau of Land Management (BLM) and Oklahoma Corporation Commission (OCC)], which keeps track of significant natural gas and oil production pipeline statistics, plus a

more recent annual compliance report from Williams Four Corners on the Los Mestenios Compressor Station in 2007, indicate the initial fuel use limit (16 mmscf/yr) is underestimated, but does not support a historical typographic error suggestion reflected in the application request. The maximum actual use was 21.8 mmscf/yr in 2007, with all years including down-time for Summer months. The recalculated fuel use limit from the assumed re-rating of the IC engine to 7.4 MMBtu/hr would result in an assumed maximum fuel usage, if the source operated year-round with the assumed safety factor of 25%, equal to 67.25 mmscf/yr. This is a capacity increase of 420% over the currently limited actual use; 308 % greater than the maximum actual use demonstrated in compliance reports; and 175% greater than the maximum monthly actual use at maximum monthly hours (Spring 2004), extrapolated to full use over one year with no down time. At the application adjusted re-rating of 6.9 MMBtu/hr for altitude, and the operating hours of 7296 for method of operation, counting Summer down time, as is represented in all compliance reports, per 6 years of records, plus a conservative 10% safety factor, the fuel usage would equal 46 mmscf, a capacity increase use of 346% over operationally restricted use. In summary, the total submissions of fee schedules, semi-annual compliance reports, and manufacturer's data, do not support a reasonable potential for this source to expect to achieve a maximum potential of either 67.25 mmscf/yr, or the suggested typo change to 61 mmscf/yr fuel use for the IC engine for engine rating, operating hours, or fuel usage, as presented in the application for the restricted use the source has imposed on this unit. The fuel use limit for the IC engine, based on existing performance and manufacturer's data is reasonably increased, from 16 mmscf/yr to 46 mmscf/yr, which is the higher of reasonable alternatives presented by EPA evaluations of data. This limit is based on the adjusted re-rating of the IC engine for altitude at 6.9 MMBtu/hr and adjusted maximum operational time, per application information. This limit will account for variable capacity of the source to compress natural gas through the pipelines, plus a reasonable safety factor over the maximum design fuel use rate of all engines, to meet the NO_2 NAAQS (see discussion on modeling in Section 4.g below).

IC engine heat input rate: The applicant has indicated that there is no information provided in their records on the actual replaced IC engine to confirm that this engine is identical in performance and nature to the replaced unit. Without precise specifications on which version of the model was replaced, the applicant used manufacturer's data from all versions, including standard engines, engines with catalytic convertors, and low emission engines, to pick the highest value of pollutants, regardless of version, to estimate potential to emit for all pollutants. The result is a mix of multiple versions of this model for worst case emission levels for the model, which do not reflect any single actual version of this model.

Review of extensive manufacturers data with built-in deviation for safety factors, indicate that the probability that the IC engine, without a catalytic converter, has little or no potential to produce equal amounts of CO and NOx, at the levels presented in the application, unless the engine is run rich-burn, beyond design mode presented in the application. The application included PTE levels of NOx which, when screened and analyzed by EPA against the NAAQS, were found to nearly exceed the standards at portrayed emission rates, at a requested re-rating of the IC engine (Unit No. 2) of 7.4 MMBtu/hr with a safety factor of 25% (see discussion on modeling in Section 4.g below). The re-rating request, along with a fuel usage change request, was a result of a single stack test made with a portable analyzer on the source in 2004, which indicted that the original fuel usage number may have been a typo. Information was provided in the application to partially support the request, at least with respect to an engine re-rating, but did not support either the requested level of re-rating or the level of fuel usage. Additional information provided after the application was received, with a request to re-rate the engine at 8.7 MMBtu/hr with a 25% safety factor, was considered, along with the evaluation of the originally requested re-rating. The re-rating of 7.4 MMBtu/hr was preliminarily screened against the NAAQS by EPA at a 242 tpy NOx calculated level by the Company.

Summary on PTE for IC engine: A request in the application that the IC engine (Unit No. 2), rated at either 8.7 or 7.4 MMBtu/hr with an additional 25% safety factor on emissions to equal a maximum of 242 tpy NOx is denied, based on a combination of modeling results (see discussion in Section 4.g below) and reasonable evaluation of data (normal operational data from all submitted fee schedules and manufacturers' data). A request in the application that the IC engine (Unit No. 2), rated at 7.4 MMBtu/hr, operated at 8760 hours for Unit No. 2, with a 10% safety factor, based on modeling results and a reasonable evaluation of data, is therefore also denied, unless these levels are limited. A limit on the maximum heat input rate of the IC engine at 6.9 MMBtu/hr for Unit No. 2, in addition to the fuel usage rate limit of 46 mmscf/yr, without further consideration of emission limitations, which is the higher of reasonable alternatives presented by EPA evaluations of data, will be placed in the permit to allow tracking of the emissions for this unit. At this rating and fuel use, the calculated NOx emission levels are 153 tpy for the IC engine and 172.3 tpy for the source. Initial screening results indicate these emission levels will not significantly impact the NO_2 NAAQS. Additionally, the corresponding CO will decrease to 118.4 tpy source-wide/107 tpy for the IC engine, per similar compliance report maximum levels reported for the IC engine since the current Title V issuance. This level and the worst case scenario emissions levels for VOC

currently permitted, will be allowed until the source has tested the emissions, two months after permit issuance date, to verify the general emissions data from the particular version of the IC engine that replaced the original. A condition will be placed in the permit to reapply for modification to the permit, should the tests show either a greater than insignificant increase (> 2 tpy) or greater than 10% decrease from proposed PTE for this unit in this notice and the resultant permitting action. This replacement will also assure that removal of the specific emissions limitations for this unit, through removal of the 40 CFR Part 63, Subpart HH or misapplied Part 60, Subpart GG requirements, will not cause a case of backsliding in permitted conditions, or an exceedance of the NAAQS.

An additional requirement is being placed in the permit to conduct a quarterly compliance test for one year, within 2 months of the effective date of the permit, for the IC engine 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 (see further discussion on Facility-wide PTEs below). A condition will be 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 this notice and the resultant permitting action, and reapply for modification to the permit if the difference is an increase in emissions. A requirement to model emissions for the source, based on cited changes in fuel usage and engine rating, and resultant errors in previous source modeling (see Section 5.g below), was conducted to verify combustion source changes to heat input rate and fuel consumption for compliance with modeling and the NAAQS. The resultant permit requirements will assure that removal of the emissions limitation for this unit, through removal of the 40 CFR Part 63, Subpart HH requirements and/or misapplied Part 60 Subpart GG requirements will not cause a case of backsliding in permitted conditions, or an exceedance of the NAAQS.

Facility-wide PTEs: The permittee requested a safety factor of 50% over recalculated PTE emission rates of the source of 143.21 tpy for CO (equal to 215 tpy); a 25% safety factor over VOCs from the regulated combustion sources of 2.4 tpy (equal to 3 tpy); a 40% safety factor over recalculated PTE emission rates of 12.78 tpy HAPs (equal to 17.9 tpy); and an increase in fuel consumption of 54 mmscf/yr (equal to 61 mmscf/yr), and no safety factor over VOCs from flash tank and fugitive emissions, equal to 228.2 tpy. In a Memorandum from EPA to all Regions, dated January 1, 1995, signed by John S. Sietz, Director of Office of Air Quality Planning and Standards, with a subject of *Options for Limiting the Potential to Emit (PTE) of a Stationary Source Under Section 112 and Title V of*

the Clean Air Act (Act), the concept of determining maximum capacity was discussed, with respect to calculation of PTE. Inherent limitations, considered under physical or operation restrictions, were to be considered in the calculation of PTE, and PTE was set up for both construction and Title V, without further reference to add-on safety factors. Where standards or modeling would restrict the PTE, safety factors would only apply as they meet the standards or modeling. Where they do not apply, EPA policy has been to consider reasonable additional potential, not additional potential to avoid compliance issues. The permittee has not provided applicable rationale to demonstrate the requested safety factors are either reasonable over existing physical and operational restrictions already factored into the emission calculations, per manufacturers' data, or reasonably achievable at maximum potential. The previous 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 an alternative 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 (due to HAP increases), to equal emissions represented in Table 1.

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. The EPA has reviewed for accuracy the submittals for fee schedules for the years 2002, 2003, 2004, 2005, 2006, and 2007, and compliance reports for representative years 2004-2005, and 2007.

Table 1: Potential to Emit in Tons per Year (tpy)[3]
Williams Four Corners, LLC, Los Mestenios Compressor Station
(Only the unregulated PTE are for informational purposes only)

Unit ID and Emissions Unit	**NOx**	**VOC**	**SO_2**	**PM_{10}**	**CO**	**Lead**	**HAP[4]**
1, Solar Saturn 1200 Turbine, NGF,	19.3[1]	0.4	Neg.	Neg.	11.4[1]	N/A	0.4
2, Caterpillar G-399-TA, NGF Engine,	153	2.9	Neg.	Neg.	107	N/A	0.7

Unit ID and Emissions Unit	NOx	VOC	SO_2	PM_{10}	CO	Lead	HAP[4]
TK-1, Fixed roof storage tank + flashtank	N/A	176.2	Neg.	Neg.	N/A	N/A	9.3
F-1 & F-2, FUG and Loading Loses	N/A	3.5	N/A	N/A	N/A	N/A	0.7
TOTALS tpy	172.3[2]	183	N/A	N/A	118.4[2]	N/A	11.1

[1] Regulated emissions PTE (see Table 6)
[2] Source-wide PTE as combination of regulated and unregulated source PTEs
[3] PTEs represented with a 10% safety factor over calculated PTEs in application for all emissions.
[4] Mostly formaldehyde and n-Hexane
NOx - oxides of nitrogen
VOC - volatile organic compounds
SO_2 - sulfur dioxide
PM_{10} - 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 and Unregulated Units

Pollutant	Total Emissions, tons/year Current Permit	Total Emissions, tons/year Proposed Permit	Total Emissions, tons/year Proposed Change
NOx	82.5	172.3*	+ 89.8
SO_2	NA	NA	NA
CO	239.4	118.4	- 121
PM_{10}	NA	NA	NA

Pollutant	Total Emissions, tons/year Current Permit	Total Emissions, tons/year Proposed Permit	Total Emissions, tons/year Proposed Change
VOC	228.2	183	- 45.2
Lead	NA	NA	NA
HAPs	2	11.1	+ 9.1

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

f. Emission Units and Emission Generating Activities

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.

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

Table 3. Insignificant Emission Units

Emission Unit ID No.	Unit Description	Size	Exemptions to Federal Requirements
3	Fuel Gas Heater	0.3 MMBtu/hr	< 2 tpy 40 CFR § 71.5(c)(11)(ii)
4	Heater	0.3 MMBtu/hr	< 2 tpy 40 CFR § 71.5(c)(11)(ii)
F-2	Condensate Liquid Loading Loses	Max usage 2416 gal/day	< 2 tpy 40 CFR § 71.5(c)(11)(ii)
T-2	Condensate Tank	300-bbl	< 2 tpy 40 CFR § 71.5(c)(11)(ii)
T-3	Produced Waste Water Storage Tank	300-bbl	< 2 tpy

Emission Unit ID No.	Unit Description	Size	Exemptions to Federal Requirements
			40 CFR § 71.5(c)(11)(ii)
T-4	Lube Oil Storage Tank	500-gallon	< 2 tpy 40 CFR § 71.5(c)(11)(ii)
T-5	Used Oil Tank	300-gallon	< 2 tpy 40 CFR § 71.5(c)(11)(ii)
T-6	Ambitrol Tank	300-gallon	< 2 tpy 40 CFR § 71.5(c)(11)(ii)
T-7	Methanol Tank	500-gallon	< 2 tpy 40 CFR § 71.5(c)(11)(ii)

Williams Four Corners, LLC, Los Mestenios Compressor Station provided in their application the information, and additional requested material, contained in Table 3. All emission units at this facility, except for those insignificant units listed above are identified in Table 4 below.

1.2. Source Emission Points

Table 4. 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, as adjusted for local elevation)	598 hp 750 hp	06/12/90	Compressor drive	None
T-1	Condensate Storage Tank 25428	Permian Tank Unknown N/A	500 bbl	Unknown[2]	Storage tank	Fixed roof

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
F-1	Valves, Flanges, Seals, etc. Unknown	Unknown	N/A	Unknown	Piping component fugitive 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 Company of NM (GCNM) in July, 1979, but was not installed at Los Mestenios until 1989.
[2] Manufacture date was 1993.

g. Modeling: Air quality modeling was run for the Title V existing permitted emission levels in 1996 for revised construction permitted emission levels at the maximum emission rates for NOx, as recommended by the *EPA Guideline on Air Quality Models (Revised)*. The revised modeling was a result of a previous preliminary screening by EPA Region 6, which indicated the requested NOx PTE levels would not meet the NO_2 National Ambient Air Quality Standards (NAAQS). The revised models were verified by EPA Region 6 to meet all applicable NAAQS in 1996. PSD increment was not addressed in 1996, since the minor source baseline date had not been thought to be triggered in this area. The permittee identified errors in modeled parameters in the current application. Current EPA Region 6 acceptable changes to PTEs for NOx, CO and VOC will not significantly impact the initial modeling conclusion, per Region 6 evaluation on NOx to verify results. However, an additional analysis of past modeling against the NO_2 NAAQS for requested NOx emission levels from the re-rated IC engine (Unit No. 2) was estimated to evaluate compliance with national standards. Using the same assumptions, as used in the ISC model for emissions in 1996, an EPA Region 6 screening approximation against the NAAQS indicates the requested NOx PTE level, assuming the emissions increase is linear at an assumed 100% conversion rate, would result in new maximum impacts that would be approximately 92% of the NO_2 NAAQS. An approximation of the Tier 2 screening application at an assumed 75% conversion rate, which is still conservative, but also including background and other cumulative sources, indicates an estimated value of approximately 80% of the NO_2 NAAQS. Of concern is that these approximations are based on previous ISC modeling, and AERMOD has been shown to result in higher values for annual standard modeling. These numbers are approximations, so modeling was required, prior to

public notice of the draft permit, to verify actual impacts, especially with the increases expected with this source.

Current model results. A tiered modeling approach approved in 40 CFR § 51, Appendix W, Section 5.2.4 of the Guideline on Air Quality Models, was required for the Los Mestenios Compressor Station application proposed emission levels for NOx and CO. A report on the Air Dispersion modeling, which used the EPA's AMS/EPA Regulatory Model (AERMOD) and meteorological data, was submitted to EPA for evaluation on July 1, 2009, received July 2, 2009. EPA evaluation of the modeling report on the proposed emissions was for compliance with allowable PSD increment consumption and cumulative NO_2 annual average NAAQS impacts. The increment modeling showed a high impact that was 23.2 g/m^3 modeled high impact and the NAAQS analysis had a value of 42.7 g/m^3. Both of these values seem to indicate compliance with the increment and NAAQS. However, no corrections for elevation were applied to the modeling output and ambient standard compliance analysis. The ambient standards are parts per million (ppm) at standard temperature and pressure (STP) and should be converted to equivalent standards at the elevation and temperature of the controlling receptors. This conversion to STP for high elevation, as is required for New Mexico modeling, and as was done in the previous model for this source in 1996, was not done for this modeling. The conversion of the standards to high elevation effectively lowers the NOx standard at the site for evaluation purposes. Therefore, for compliance, the source has not demonstrated compliance with the increment at the requested levels. Therefore, the Company re-rating of the engine, with an increased fuel usage of 67.38 mmscf/yr, appears to impact the NO_2 increment at the applied for levels. A preliminary EPA evaluation of PTEs from literature and compliance data from the source, indicate the engine re-rating of 6.9 MMBtu/hr for Unit No. 2, in addition to the fuel usage rate limit of 46 mmscf/yr. results in a reasonable emission level rate for the IC engine of 153 tpy NOx. EPA has remodeled the NAAQS and increment based on NOx emission rates of 153 tpy for the IC engine and 19.4 tpy for the turbine. These tpy values resulted in average NOx emission rates for the modeling of 0.5555 g/s and 4.4105 g/s for the turbine and IC engine respectively. Results of this modeling indicated the increment and NAAQS were both met. NAAQS modeling results were 42.7 $\mu g/m^3$ compared to the 79.2 $\mu g/m^3$ altitude adjusted NAAQS standard. EPA's modeling results indicate the emission rates yield maximum ambient air NO_2 concentrations that are 54% of the NAAQS and 91.08% of the increment. CO modeling (received July, 2009) rates changed but since the source's previous modeling did not yield concentrations near CO standards, revised modeling was not conducted.

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 5: Applicable Regulations: Williams Four Corners, LLC, Los Mestenios 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	

a. The Williams Four Corners, LLC, Los Mestenios 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 Mestenios 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 6: 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

b. The construction permit for Williams Four Corners, LLC, Los Mestenios Compressor Station, Permit No. 791-M-1-Revision will be superseded by issuance of the Title V renewal of R6FOPP71-04 as R6NM-04-09R1. All applicable conditions of this permit will be incorporated into the Title V renewal R6NM-04-09R1, as will the conditions of the EPA-approved custom fuel monitoring program (CFM), with rectifications to recordkeeping to coincide with Title V records management requirements. Certain non-applicable conditions that

existed in Permit No. 791-M-1-Revision will not be carried over into the Title V renewal. These include:

(1) 40 CFR Part 60, Subpart GG limitations on other combustion units, other than the turbine, Unit No. 1.
(2) Specific recordkeeping requirements are changed to coincide with the recordkeeping requirements of Title V under 40 CFR § 71.6(a)(3)(ii)(B).
(3) The requirement to burn pipeline quality natural gas will be applied to all combustion units at the source, only as collateral units using same source fuel. The regulatory requirement is on the Solar turbine (Unit No. 1), but transfers, due to actual usage, to other combustion units at the site. If the Company identifies another source for the other combustion units and supplies associated revised emission estimates for those units, they may to have this restriction removed from those units. Title V renewal application data provided is based on all combustion units burning pipeline quality natural gas.
(4) 40 CFR Part 63, Subpart HH - National Emission Standards for Hazardous Air Pollutants (NESHAP) was previously applied to the Title V permit upon initial issuance. The NESHAP for Subpart HH applicability, per 40 CFR Part 63.760(a) indicates the subpart applies to sources that meet the specific criteria in paragraphs (a)(1) for major sources of HAPs and either (a)(2) or (a)(3) for sources that process, upgrade or store natural gas either prior to the point of custody or the point at which it enters into the natural gas pipeline transmission category. With respect to the first criteria to be a major source of HAPs, defined as ≥ 25 tpy total HAPs emissions or ≥ 10 tpy any individual HAP emissions, this source is not applicable, nor has any history since before their initial Title V issuance of being applicable. Their current high individual HAP is 7.0 tpy for n-Hexane, and the source total for HAPs is 10.7 tpy. This source has no history of having met either qualifier for applicability to this NESHAP, therefore this applicability and requirement is not carried over into the Title V renewal.

c. Based on the information provided in the Williams Four Corners, LLC application, the potential to emit for VOC includes ≤ 25 tons/year of total HAPs emissions or ≤ 10 tpy any individual HAP emissions, although there has been a total increase of total HAPs from 2 tpy to 11.1 tpy. This change is the result of recalculations of emissions from stack tests and corrections to the IC engine rating, and is not the result of a physical change or change in method of operation or construction of the source.

The increase in Hazardous Air Pollutants (HAPs) to more than 10 tpy of total HAPs does not meet the applicability requirements of 40 CFR Part 63, Subpart ZZZZ - Reciprocating Internal Combustion Engines, and therefore does not meet the applicability of Subpart A. As a minor source of HAPs, this facility does not meet 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, as noted in Section 5.c(4) above. As a minor source of HAPs, this facility would also not meet the applicability standards of 40 CFR Part 63, Subpart HHH - National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities. There are no other NESHAPs that this source would be potentially subject to.

d. Other Requirements

1. 40 CFR Part 64 - Compliance Assurance Monitoring (CAM)

The Federal CAM regulations require certain sources to comply with additional monitoring requirements if specific applicability criteria are met. The criteria are related to emission limitations or standards for applicable regulated air pollutants, the use of a control device to achieve compliance with the limitation or standard, or the unit potential pre-control device emissions of applicable regulated air pollutants at specified amounts. In the case of this facility, the gas compressor engine and the two heaters are not subject to an emission limitation or standard, and are not equipped with controls. Therefore, CAM is not applicable to these units.

2. 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. See further discussion on requirements under National Emission Standards for Hazardous Air Pollutants in Section 5.b. and c. above. Further, Williams Four Corners, LLC Los Mestenios Compressor Station is not subject to any implementation plan, as exist within State jurisdictions. Therefore, Williams Four Corners, LLC Los Mestenios Compressor Station is not

subject to any substantive requirements that control its emissions under the CAA, beyond identified NSPS requirements and collection and recordkeeping to provide materials that substantiate existing permit requirements.

e. 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.

f. 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.

g. 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 H_2S per 100 cubic feet.

h. Testing:

(1) An initial and subsequent quarterly compliance emission tests, during the first year of operation after permit renewal issuance, are required to validate recalculated PTE on estimated re-rating of the compressor IC engine (Unit No. 2). The tests will be conducted using a portable analyzer and EPA Method 7 of 40 CFR Part 60, Appendix A.

(2) 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.

(3) An initial compliance test on calculated and projected potential to emit

(PTE) for all pollutants with safety factors, not currently monitored under 40 CFR Part 60, Subpart GG, from Unit No. 1 at this source will be conducted, using applicable EPA Methods established within 40 CFR Part 51, Appendix M, or as otherwise specified in the permit by applicable requirements, within 2 months of permit issuance date.

(4) Other compliance testing**:**

(a) Compliance tests may be required by EPA for nitrogen oxides (NOx) and sulfur dioxide (SO2) for the turbine (emissions unit No. 1), to demonstrate compliance with 40 CFR Part 60, Subpart GG for permit requirement 4.1.

(b) 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.

(c) 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).

(d) Tests shall be conducted within ninety (90) days of written notice from EPA that a test is required.

(e) NOx 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.

(f) The permittee will comply with all pre-test notification and meeting, test protocol submission, and EPA testing requirements, along with applicable post-test reporting, as noted in applicable sections of the draft permit.

i. 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.

(2) Monthly and annual 12-month rolling average monitoring and recordkeeping, from continuous monitoring device, averaged daily and recorded monthly, with recordkeeping of the fuel flow/consumption of the turbine and IC engine (Unit Nos. 1 and 2); and

(3) Monthly and rolling twelve-month average heat input of the actual heat input rates monitoring and recordkeeping for the Turbine (Unit No. 1) and IC engine (Unit No. 2).

j. Reporting:

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

(a) Hours of operation of the facility;
(b) The calculated annual emissions for the pollutants listed in Table 6 above;
(c) The monthly and annual 12 month rolling averages of the fuel flow/consumption of the turbine and IC engine;
(d) The monthly monitoring and 12 month rolling~~semi-annual~~ averages of the actual heat input rate for the Turbine and IC

engine; and

(e) 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) Initial compliance test report on PTEs with safety factors within two months of permit issuance date.

(3) 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. ESA effects finding:

a. Endangered Species: The Environmental Protection Agency has evaluated the potential effects of this permit upon listed or proposed endangered or threatened species. Using available tools, primarily the Biota Information System of New Mexico (BISON-M), current Version, EPA finds data that leads to a determination of "no effect" upon listed or proposed endangered or threatened species as result of this permit renewal.

The facility currently holds construction and operating permits with USEPA with limits on oxides of nitrogen (NOx), carbon monoxide (CO), volatile organic carbon (VOC), fuel combustion usage, quality of fuel combusted (which limits sulfur dioxide emissions), and opacity. Testing, monitoring, and reporting requirements, per New Source Performance Standards for Stationary Gas Turbines, under 40 CFR Part 60, Subpart GG, along with periodic monitoring requirements for fuel usage and quality and heat input rate of the Internal Combustion compressor engine are compliance controlling factors of the current permits and permit renewal, which will incorporate all applicable conditions of the existing construction permit into

the Title V permit. The source has been in operation at comparable levels at this site since 1989, with limitations on operating conditions since initial construction permit issuance (*see* Section 4.d. above). The proposed permit is written to include limitations, and monitoring requirements on those conventional parameters as a continuance of the conditions in the current permit. Changes to the limitations and monitoring requirements from the current permit are discussed in Section 4 above. EPA believes there are relatively minor changes to the environmental baseline (emissions established for this source at the time of initial source construction), associated with corrections to potential emissions, as there has been no change in the method of operation or functionality of equipment. Emissions corrections associated with this permit only quantify emissions always present since construction. Changes reflected in the proposed Title V renewal action include an increase in overall source emissions of NOx as a correction to the record; decrease in CO emissions from a recalculation on correction to fuel use and internal combustion engine rating and measured emissions; a correction from the current permit to the potential to emit for VOCs from inclusion of existing flash tank emissions; and an increase in fuel combustion usage, which is a correction from previous historical material. All recalculations and corrections are not the result of modifications of the source or changes in the method of operation, and do not impact existing National Ambient Air Quality Standards (NAAQS) (*see* Section 4.g above for discussion on air quality modeling). The changes in emission Potentials to Emit incorporate existing emissions from actual operation since the source has been in operation, and continue to verify the source is minor for their category. The limitations, compliance and monitoring requirements in the proposed permit are believed protective of wildlife, in association with the National Ambient Air Quality Standards.

Eleven species in Rio Arriba, Sandoval, McKinley, and San Juan County are listed as Endangered or Threatened, according to the most recent listing dated March 2009, currently available at EPA, Region 6. Three of the species are avian and include the Mexican spotted owl, Southwester willow flycatcher, and Interior least tern. Although the Black-footed ferret is listed as endangered in the County listings, it is also listed as extirpated in Rio Arriba County, and there are no sightings listed in Sandoval, McKinley, or San Juan County. The Rio Grande silvery minnow is only found in the 160 mile reach of the Rio Grande between Cochiti and Elephant Butte Reservoirs along the Rio Grande, and is listed as extirpated in all of the listed counties above. The Colorado pikeminnow and Razorback sucker are only found down-river from Farmington, New Mexico. There are no sightings of the endangered or threatened fauna in the vicinity of the

source, and listed fauna in neighboring Counties were not surveyed, due to the distance from source, prevailing winds west to east and south to north, dispersion of emissions, and assurance that these emissions meet the NAAQS.

Available information (Bison-M) presents the occurrence of the listed threatened and endangered species in Rio Arriba County in the area of emissions as follows:

Table 7. Occurrence of Threatened and Endangered Species in Rio Arriba, Sandoval, McKinley, and San Juan Counties in New Mexico

Species	Season	Occurrence Rio Arriba County	Occurrence Sandoval County	Occurrence McKinley County	Occurrence San Juan County
Mexican Spotted Owl	Year Round	Rare	Rare	Rare	Rare
Southwestern Willow Flycatcher	Year Round	Rare	Rare	Rare	Rare
Interior least tern	Spring	Uncommon migrant	-----	-----	----
Black-footed Ferret	Year Round	Not present	No sightings	Not present	No sightings
Rio Grande silvery minnow	Year Round	Not present	Not present	-----	-----
Colorado pikeminnow	Year Round	-----	-----	-----	No sightings
Razorback sucker	Year Round	-----	-----	-----	No sightings
Zuni fleabane	Year Round	-----	-----	Not present	-----
Knowlton cactus	Year Round	-----	-----	-----	Not present
Mancos milk-vetch	Year Round	-----	-----	-----	Not present
Mesa Verde cactus	Year Round	-----	-----	-----	Not present

Research of available materiel finds that the primary cause for the population decreases leading to threatened or endangered status for two of the avian species, the Mexican spotted owl and Southwestern willow flycatcher, is destruction of habitat. Reissuance of this permit for the existing source is found to have no impact on the habitat of the listed species, since no construction is authorized by this permitting action.

No pollutants are identified by the permittee-submitted data at levels which might affect species habitat or prey species that do not or will not be limited by the permit, and have not been evaluated by Region 6 to meet National Ambient Air Quality Standards. Catastrophic fires and elimination of riparian habitat also were identified as threats to species habitat particularly that of the Mexican spotted owl and Southwestern willow flycatcher. Additionally, parasitic activity by other birds has been cited as cause for decline of the Southwestern willow flycatcher. The Clean Air Act Title V program regulates emissions of pollutants on Indian lands and does not regulate forest or wildlife management, or agricultural practices, which contribute to catastrophic fires, elimination of riparian habitat and decreased populations. Reissuance of this permit is found to have no impact on the habitats of these species.

The Interior least tern populations have declined due to habitat destruction by permanent inundation, destruction by reservoir releases, channelization projects, alterations of natural river or lake dynamics, resulting in vegetational succession of potential nesting sites, and recreational use of potential nesting sites. Reissuance of this permit is found to have no impact on the habitat of this species, as none of the above listed activities is authorized by this permitting action.

The critical habitats for both the Colorado pikeminnow and the Razorback sucker are both either down-river of the City of Farmington, or well down-river of that City. No sightings of the pikeminnow has occurred upriver of the Hatch Trading Post (Miller and Ptecek 2000; Ryden 200b), nor any collected upstream of the Hogback Diversion during the annual U.S. Fish and Wildlife Service surveys in 1999. No native Razorback suckers of any life stage were collected during the same survey. The re-issuance of this permit will not affect downriver aquatic species or their food supply, as the source of emissions for this permit is approximately 35 miles southeast of the Navajo Dam, with no substantiated waterbodies within the vicinity of this source, except Tapicito Creek (5-10 miles distance), which is generally a dry streambed. Conditions of the permit will ensure that the emissions do not cause or contribute to an exceedence of the NAAQS, which is indirectly protective of aquatic species.

The Knowlton cactus, the Mancos milk-vetch, and the Mesa Verde cactus are listed as endangered in San Juan County, due to either over-collection, livestock trampling, maintenance and construction of utility corridors, and/or habitat degradation due to overgrazing, mining, commercial and residential development, and off-road vehicles. Reissuance of this permit is not related to these activities.

A field survey of threatened and endangered species was conducted by Ecosphere Environmental Services on behalf of the permittee, to answer questions on potential habitat and sightings of these species within the area of the source of emissions. The survey was conducted on June 10, 2009, and supports the EPA finding of no impact for all listed threatened and endangered species for Rio Arriba County and surrounding Counties. A tiered modeling approach approved in 40 CFR Part 51, Appendix W, Section 5.2.4 of the Guideline on Air Quality Models, was conducted on the Los Mestenios Compressor Station application proposed emission levels for nitrogen oxides (NOx) and carbon dioxide (CO) to estimate impacts of the emissions from this source. Cumulative emissions were assessed from surrounding sources in the model. The results of this modeling noted the requested changes in emissions would meet the National Ambient Air Quality Standards (NAAQS) in the significant impact area, within 53 kilometers of the station. However, for compliance, the source has not demonstrated compliance with the increment at the requested levels to assure compliance with all standards. Along with a recalculation of emission levels, based on Potential to Emit (PTE) from manufacturers data and existing source data, emissions PTE for NOx and CO has been reduced in the permit records to further assure attainment of all NAAQS and the further protection of threatened and endangered species.

Existing requirements in the Title V permit for the Williams Field Services, Los Mestenios Compressor Station, associated with EPA responsibilities toward consultation with the FWS, or notifications to the FWS are removed from the proposed permit. They are not applicable to the permittee. EPA has regulatory requirements for the Company to notify EPA of any construction activities, thus allowing for the evaluation of impacts to threatened and endangered species by those activities. EPA will direct construction activities, such that they meet the requirements of FWS Endangered Species Act. At this time, the facility is not required to obtain a construction permit. If future construction activities under the CAA results in Federal actions, EPA will reinitiate consultation with the Fish and Wildlife Service.

8. NHPA Effects Findings:

Information has been received from the Company that there are no records in their

files indicating NEPA compliance for cultural resources or a letter from the State Office for Cultural Preservation. However, this source changed ownership to Williams Field Services in 1996 (currently designated Williams Four Corners, LLC), since original construction, date unknown. The first know construction permit was issued by NMED on a streamline application Notice of Intent in 1993 to the Gas Company of New Mexico. The earliest verifiable date of "construction" listed for any of the units in the current application is 1989. Original construction appears to have consisted of installation of the following regulated equipment: compressor turbine, internal combustion (IC) engine, fuel gas heater, and additional heater. Insignificant emission units were not required to be reported on applications, but probably consisted of the many of the units in Table 3 above. All of these units have substantially remained the same size and configuration as initially installed, with continued maintenance, repair, and in the case of the IC engine, a replacement of identical model and era engine on May 18, 2001. There appears to have been no change in the method of operation and no modification to the source since initial permit application, therefore no further construction.

This information was conveyed to Mr. Jeffrey Blythe, who is the Historical Preservation Officer for the Jicarilla Apache Nation, for coordination purposes, due to the nature and lack of specific information on cultural or historic sources in the vicinity of the emission source. Since no other public notice documents related to this facility, have provided information needed to determine whether the facility would have any effect upon cultural properties listed on, or eligible to, the National Register of Historic Places in the area of potential effect, EPA will include a request for information to the public and applicable agencies on this subject in the Public Notice for this permit action. Material submitted during the public comment period will be evaluated for an effects determination, which may impact the timing of the permit issuance. If no comments are received, it will be assumed by EPA that there are no effects from reissuance of this permit.

9. 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 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 Catherine Penland at the address listed below:

Air Permits Section
EPA, Region 6
1445 Ross Avenue (6PD-R)
Dallas, TX 75202
E-mail: penland.catherine@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 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 Catherine Penland at the address listed in Section 6.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 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 6.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.