



**Air Pollution Control
Title V Permit to Operate
Statement of Basis for Permit No V-SUIT-0027-2015.00
{Date}**

**Williams Four Corners, LLC
Ignacio Gas Plant
Southern Ute Indian Reservation
La Plata County, Colorado**

1. Facility Information

a. Location

The Ignacio Gas Plant, owned and operated by Williams Four Corners, LLC (Williams), is located within the exterior boundary of the Southern Ute Indian Reservation. The exact location is SE ¼ Section 35, SW ¼ Section 36, T34N, R9W, in La Plata County, at latitude North 37.145278 and longitude West - 107.784444. The Mailing address is:

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

b. Contacts

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c. Description of Operations

The Ignacio Gas Plant provides compression, dehydration, sweetening, and natural gas liquids recovery for the San Juan Gathering Systems, an approximately 5,300 mile pipeline system gathering gas from the San Juan Basin. The San Juan Basin spans the southwest corner of Colorado and the northwest corner of New Mexico.

The Ignacio Gas Plant has the ability to condition approximately 500 to 650 million standard cubic feet (MMscfd) of field gas per day into saleable natural gas liquids and residue gas. The primary plant

operations include inlet compression, dehydration, carbon dioxide removal, natural gas liquids removal, fractionation, and storage.

This facility consists of one turbo-expander cryogenic plant nominally rated at 450MMscfd and one NGL fractionation plant. Present total gas throughput averages close to 500 MMscfd. Of this, approximately 380 MMscfd is Trunk S gas that is processed in the cryogenic plant. About 90 MMscfd is from Trunk C that is dehydrated and then normally bypasses all other plant processes, including amine treating and the cryogenic plant.

There are two primary incoming pipelines to the plant. The 30" Trunk S from the San Juan Basin area of primarily New Mexico brings hydrocarbon liquid-rich gas for processing. A filter separator and slug catcher are used to recover free liquids from the inlet stream. This protects the compressor turbines from foreign material and free liquids. Trunk C is a 16" line that brings in gas with a lower content of recoverable hydrocarbon liquids that contains about 6% carbon dioxide and must be treated or blended with the cryogenic process residue stream for the entire outlet stream to interstate pipeline quality specifications. This can be processed in the amine treater and/or cryogenic plant if necessary to achieve interstate pipeline gas quality specifications.

Primary plant operations include inlet compression turbines, the east glycol dehydration unit, the amine plant, the west glycol dehydration unit, the molecular sieve dehydrator, the turbo-expander plant (cryogenic removal of natural gas liquids), the fractionation plant, and recompression. Each of these plant operations is described in detail below.

Inlet Compression

Inlet compression at the facility is accomplished through an arrangement of compressors driven by stationary natural gas turbines. The turbines are 1-Solar Titan 130 Natural Gas-Fired Turbine (Trunk S), 1 – Solar Mars 100 Natural Gas-Fired Turbine (Trunk S) and 1 – Solar Taurus 70 Natural Gas-Fired Turbine (Trunk C) equipped with a heat recovery steam generator.

Phase 2 consisted of changes to the re-compression system at the facility involving changes in and around the existing Recompression Building. Two existing GE-M3142J A/T gas turbine re-compression units were replaced with 2-Solar Titan 130 Natural Gas-Fired Turbines equipped with heat recovery steam generators (HRSG). The Phase 2 Recompression System was put on line in May 2014.

Dehydration

Dehydration of Trunk C field gas is accomplished at the East Dehydrator. The East Dehydrator is equipped with a natural gas-fired reboiler rated at 0.75 MMBTU/hr. The East dehydration unit regenerator vent goes to the Callidus Thermal Oxidizer (ThOx). Emission Limits and Operating Requirements dictated by PSD-SU-00027-01.00 issued December 22, 2010 are applicable.

Initial dehydration of Trunk S field gas is accomplished at the West Dehydrator which removes excess moisture to decrease the burden on the molecular sieve dehydrator. The West Dehydrator is equipped with a steam-heated glycol reboiler. The West Dehydration unit regenerator vent's hydrocarbon slip is

controlled by the Flare. Emission limits and operating requirements dictated by PSD-SU-00027-01.00 issued December 22, 2010 may be applicable.

The molecular sieve dehydrator consists of four beds. Three beds are typically active while the fourth undergoes regeneration. Regeneration is accomplished by a natural gas-fired regeneration gas heater which is designated at 18.5 MMBtu/hr. the standby regeneration gas heater, which is also natural gas fired, is design-rated at 13.02 MMBtu/hr.

Carbon Dioxide Removal

Carbon dioxide removal occurs within the Amine Treatment System. Because the amine reboiler utilizes heat from plant steam, it is not a source of combustion emissions. However, hydrocarbons are released from the process during amine regeneration. These hydrocarbons, entrained in the carbon dioxide vent stream, are controlled by the Thermal Oxidizer. Emission Limits and Operating Requirements dictated by Prevention of Significant Deterioration (PSD) Permit No. PSD-SU-00027-01.00 issued December 22, 2010 are applicable.

Natural Gas Liquids Removal, Fractionation and Storage

At the Turbo-Expander Unit, the demethanizer separates methane from the natural gas liquids. The natural gas liquids are then sequentially separated into Ethane, Propane, Butane and Natural Gasoline at the fractionation plant. Variation in fractionation operations can occur based on market conditions. The demethanizer, deethanizer, depropanizer, and debutanizer reboilers utilize plant steam. Storage facilities are located within the facility and include:

Product	No. of Vessels	Vessel Size (gallons)	Pressure Rating (psig)
Y-Grade Bullets	5	25,200	700
Propane Bullets	10	42,000	250
Butane Spheres	2	260,232	85
Natural Gasoline Spheres	2	214,900	30
Condensate Bullets	2	41,581	85
LNG Bullet	1	38,500	185
LNG Bullet	1	55,000	90
Propane Bullet	1	90,000	240
Condensate Bullet	1	90,000	240

Loading of Natural Gas Liquids

Natural gas liquids are transported off-site via pipelines and tanker trucks. Y-grade (demethanized mix of natural gas liquids composition of which depends on a number of plant operating variables), is transported off-site via a natural gas liquids pipeline. The loading of the remaining natural gas liquids occurs through loading racks - two (2)-propane loading racks, one (1)-butane loading rack, and two (2)-natural gasoline loading racks. These liquids can also be sent to the pipeline when excess at the plant is available.

Re-Compression

The methane stream leaving the Turbo-Expander Plant (TXP) is recompressed by two (2) Solar Titan 130 natural gas-fired turbine driven compressors equipped with Heat Recovery Steam Generators (HRSG).

Utilities

The following combustion sources at the Ignacio Plant are equipped with waste heat recovery units:

- Trunk C - Solar Taurus 70 w/ HRSG
- Recompression - Two (2)-Solar Titan 130s w/ HRSG
- Thermal Oxidizer w/ HRSG

These waste heat recovery units provide the Ignacio Plant with high pressure steam (600 psig) to drive a steam turbine generator set to produce plant electricity, as well as low pressure steam (60 psig).

Supplemental low pressure steam is produced by the Vogt CL.VV-22.5 boilers. These units generally operate only when the re-compressors are not in operation. The plant includes a two-cell cooling tower.

Emission Control Equipment

VOCs may be released from various process units, storage tanks and leaking components. Such releases occur throughout the plant, and may be controlled or uncontrolled (fugitive). Controlled releases are collected and routed through a header to the smokeless flare or the flash gas system. The Ignacio Gas Plant operates a Callidus Technologies Thermal Oxidizer (TO) installed in 1999 and equipped with a forced draft combustion air blower and vent stack. The TO controls emissions from the East Dehydration Unit and the Amine Treatment System. Thermal Oxidizer Emission Limits and Operating Requirements dictated by Prevention of Significant Deterioration (PSD) Permit No. PSD-SU-00027-01.00 issued December 22, 2010 are applicable.

The uncontrolled releases are minimized through the implementation of a Leak Detection and Repair (LDAR) program. The amine treatment system requires an LDAR program at least as stringent as NSPS KKK for equipment leaks (this is a PSD BACT requirement as this unit is not subject to NSPS KKK). The Turbo-Expansion Unit is subject to NSPS KKK. Releases from the following sources are controlled through the flare system:

- Inlet separator (C Trunk)
- Inlet Gas Cooler
- West Dehydration Unit
- Fuel Gas Line and Filter
- Various Process Scrubbers and Blow Down Vents
- Booster Compressor CG-8104 Suction Line (TXP)
- Deethanizer Reflux Condenser, Overhead Off Gas, Reflux Accumulator, Reboiler and Feed Pre-Heater
- Depropanizer and Depropanizer Reflux Accumulator
- Debutanizer, Debutanizer Reflux Pumps and Accumulator

21	Installed: Pre-1972	
	1 – Callidus Technologies 203313-00 thermal oxidizer	None
22	Serial No.: 203313-000 Installed: 01/01/1999	
	1 – Zecco Plant Flare	None
23	Serial No.: 17790 Installed: 2009	
	1 – Fluor Company Cooling Tower	None
24	Installed: 01/01/1956	
	1 – Waukesha H866D Diesel Fired Water Pump Engine, 384 nameplate rated HP	None
25	Serial No.: Installed: 01/01/1978	
	1 – Caterpillar 4W-3798 Diesel Fired Water Pump Engine, 305 nameplate rated HP	None
26	Serial No.: 4260 Installed: 01/01/1985	
	1 – Solar Mars 100 Natural Gas-Fired Turbine (Trunk S)	None
27	Serial No.: 1355M Installed: 02/01/2013	
	3 – Solar Titan 130 Natural Gas-Fired Turbine	
28	Serial No.: 0710L Installed: 02/01/2013 (Simple Cycle)	None
30	Serial No.: 0723L Installed: 02/01/2013 (Combined Cycle)	
31	Serial No.: 0724L Installed: 02/01/2013 (Combined Cycle)	
	1 – Solar Taurus 70 Natural Gas-Fired Turbine (Trunk C)	None
29	Serial No.: 0764B Installed: 02/01/2013	
	2 – Horton 42,000 gallon condensate storage tank	None
32	Installed: 1956	
33	Installed: 1956	
	2 – General Electric M3142J A/T Natural Gas-Fired Turbine	
*10	Serial No.:282514 Installed: 1984	None
*11	Serial No.:282515 Installed: 1984	

*According to Williams, these units have been permanently removed from the facility. However, these units remain listed in the Part 70 permit as they are still listed in the PSD permit for this facility.

The Southern Ute Indian Tribe/State of Colorado Environmental Commission’s Reservation Air Code 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 hazardous air pollutants (HAPs) under Section 112(b) of the Clean Air Act (CAA) and below 1,000 lbs per year or the de minimis level established under Section 112(g), whichever is lower, for HAP emissions [RAC 2-106(4)(f); RAC 1-103(36) and (37)]. However, the application may not omit information needed to determine the applicability of, or to impose, any applicable requirement, or to calculate the fee [RAC 2-106(4)(f)]. Units that qualify as “insignificant” for the purposes of the Part 70 application are in no way exempt from applicable requirements or any requirements of the Part 70 permit.

Williams stated in its Part 70 initial permit application that the emission units in Table 2, below, are insignificant. The application provided calculations for heater/reboiler emissions based on EPA’s AP-42

emission factors. Williams provided sufficient information, including EPA Tanks 4.0.9d calculations, to verify any emissions from liquids in the tanks were insignificant. This data supports William’s claim that these units qualify as insignificant.

**Table 2 – Insignificant Emission Units
Williams Four Corners LLC, Ignacio Gas Plant**

Emission Unit ID	Description	Size/Rating
N/A	2 – Lube oil storage tank	2,060 gal
N/A	1 – Diesel tank (river water pump building & fire water pump generators)	290 gal
N/A	1 – Diesel tank (river water pump building & fire water pump generators)	322 gal
N/A	1 – Spent lube oil storage tank	33,694 gal
N/A	1 – Lube oil storage tank	11,653 gal
N/A	1 – Diesel storage tank	517 gal
N/A	1 – Diesel storage tank	1,028 gal
N/A	1 – Gasoline storage tank	582 gal
N/A	1 – Petroleum solvent storage tank	509 gal
N/A	1 – Lube oil storage tank	6,300 gal
N/A	1 – Spent lube oil storage tank	2,000 gal
N/A	1 – Turbine 32 oil storage tank	8,820 gal
N/A	2 – Natural gasoline sphere – 30 psig	214,924 gal
N/A	2 – Natural gas liquid rundown pressurized tank – 85 psig	41,581 gal
N/A	1 – Recovery oil tank (T9103)	504 gal
N/A	1 – Recovery oil tank (T9104)	500 gal
N/A	1 – Ambitrol storage tank	748 gal
N/A	2 – Butane sphere – 85 psig	260,232
N/A	5 – Y-Grade bullet – 700 psig	22,321 gal
N/A	10 – Propane bullet – 250 psig	40,805 gal
N/A	1 – Sulfuric acid storage tank	4,200 gal
N/A	1 – Sulfuric acid storage tank	294 gal
N/A	1 – TEG storage tank	2,910 gal
N/A	1 – Raw water storage tank (West tank)	215,904 gal
N/A	1 – Raw water storage tank (East tank)	200,000 gal
N/A	1 – Optisphere HP55441 tank	400 gal
N/A	1 – Ambitrol storage tank	2,300 gal
N/A	1 – DI water storage tank	215,977 gal
N/A	2 – Raw water storage tank	21,000 gal
N/A	1 – Salt water storage tank	4,300 gal
N/A	1 – Depositrol PY5206 tank	400 gal
N/A	1 – Biomate MBC2881 tank	55 gal
N/A	1 – Cooling tower blend tank	2,970 gal
N/A	1 – Klaraid IC1172 tank	400 gal
N/A	1 – Cortol OS2001 tank	400 gal
N/A	1 – Steammate NA0120 tank	400 gal
N/A	3- Gas spec (amine) storage tank – 1 fresh, 1 mixed, and 1 regenerated	16,800 gal
N/A	1 – Gas Spec (amine) storage tank	4,200 gal
N/A	1 – Gas spec (amine) storage tank	20,000 gal
N/A	1 – Methanol storage tank	24,240 gal
N/A	1 – Turbine 32 oil storage tank	300 gal
N/A	1 – Gengard GN7110 tank	550 gal
N/A	1 – Bleach tank	330 gal
N/A	1 – Waste oil tank	630 gal
N/A	1 – TEG storage tank	719 gal
N/A	1 – Turbine 32 oil storage tank (steam turbine)	850 gal
N/A	1 – Klaraid IC1172 tank	500 gal

N/A	1 – Polyfloc AE1115 tank (inside clear water building)	120 gal
N/A	1 – Diesel storage tank	564 gal
N/A	1 – LNG pressurized bullet – 185 psig	38,513 gal
N/A	1 – LNG pressurized bullet – 90 psig	55,000 gal
N/A	1 – Waste water frac tank	16,800 gal
N/A	1 – Slop oil tank	4,200 gal
N/A	1 – Odorant storage tank	796 gal
N/A	1 – Propane bullet – 240 psig	90,000 gal
N/A	1 – Condensate bullet – 240 psig	90,000 gal
N/A	1 – Sodium Hydroxide tank	35 gal
N/A	1 – Lube oil storage tank	6,300 gal
N/A	2 – Lube oil storage tank	2,000 gal
N/A	1 – Lube oil/water storage tank	1,000 gal
N/A	1 – Sodium Hydroxide tank	300 gal

e. Facility Construction and/or Permitting History

The Ignacio Gas Plant began initial construction in 1956. The plant had additional construction between 1957 and the present.

1984 EPA Issued a PSD Permit for Two Natural Gas Fired Turbines

In July 1983, Northwest Pipeline (previous owners of the gas plant) submitted a Prevention of Significant Deterioration (PSD) permit application to the EPA to replace the Gasoline Plant Oil Absorption Process with a more efficient Cryogenic Turbo-Expansion Process. The Turbo-Expansion Process increased the recovery of liquids from 156,000 to 692,000 gallons per day and recovered a greater level of propane and ethane. The construction for this new Turbo-Expansion Process included a Turbo-Expansion Unit, Amine Treatment System, and two natural gas-fired turbines. However, the PSD application for this modification only discussed the two natural gas-fired turbines and potential NO_x emission. According to the applicant, the VOC emissions from the Amine Treatment System were insignificant. The application stated that all other pollutants were below significant emission rates for major modification and not subject to PSD review. On February 24, 1984, the EPA issued a PSD permit approving controlled NO_x emissions from the two turbines.

1986 EPA approval of the Colorado Department of Health and Environment (CDPHE) PSD Permitting Program

In 1986, the EPA approved CDPHE’s State Implementation Plan (SIP) for the implementation of the PSD Permitting Program and the attainment and maintenance of National Ambient Air Quality Standards, pursuant to 40 CFR 52.343. In approving the SIP, the EPA did not delegate, but rather reserved to the EPA as a federal program, PSD permitting authority with respect to sources on Indian lands and Reservations, and further stated in 51 FR 31325 (September 2, 1986) that the EPA’s PSD regulations will also remain in effect for sources located on Indian Reservations and for sources that have received earlier PSD permits from the EPA.

However, there was an ongoing disagreement between the CDPHE, the EPA, and the Southern Ute Indian Tribe regarding who had jurisdiction over air pollution sources located on fee lands; the Ignacio Gas Plant

is located on fee lands. Fee lands are defined as lands located within the exterior boundaries of the reservation, but are privately owned (by either Indians or non-Indians), nonpublic lands. During the resolution of this dispute, CDPHE continued to issue pre-construction permits to the Ignacio Gas Plant.

1991 Construction of the East Glycol Dehydration Unit – No Permit Issued

In March 1991, Williams Field Services installed and began operation of an East Dehydrator. VOC emissions were thought by the State to be insignificant at that time. In 1992, a notice submitted to the State of Colorado indicated that the VOC emissions from the East Dehydrator were 25 tons/year, below the 40 ton/year significant level for PSD. The VOC emissions from the East Dehydrator were uncontrolled, vented directly to the atmosphere. The EPA Region 8 was not notified by Williams about the construction of the dehydrator.

1992 Construction of the West Glycol Dehydration Unit – No Permit Issued

In November 1992, the West Dehydrator was added to the facility. Again, VOC emissions were thought by the State to be insignificant at that time. The EPA Region 8 was not notified by Williams about the construction of the dehydrator.

1997 Construction Permit for East Glycol Dehydration and West Glycol Dehydration Unit (CDPHE Issued - #96-LP-506 and #96-LP-505, respectively)

On August 31, 1995 construction permit applications for the East and West Dehydrators were sent to CDPHE. In 1997, CDPHE issued both construction permits. The permit for the West Dehydration Unit required that VOC emissions be controlled by a flare. The permit for the East Dehydration Unit required that VOC emissions be controlled by a thermal oxidizer.

1998 Construction Permit for the Amine Treatment System and Turbo-Expansion Unit Fugitive Emissions (CDPHE Issued - #97-LP-0315 & #97-LP-0316)

In March 1996, CDPHE received a permit modification request from Williams that indicated the Ignacio Gas Plant's amine regeneration unit built in 1984 emits approximately 995 tpy of VOC emissions. On July 18, 1996, CDPHE notified Williams that these were previous unreported emissions that may have triggered PSD requirements during the modification in 1984, and requested additional information. On January 27, 1997, Williams provided CDPHE with a summary of annual VOC emissions from the Amine Treatment System, turbines and Turbo-Expansion Unit. The VOC emissions were determined by the State to be significant, verifying that Williams should have gone through PSD review for VOCs in addition to the PSD review for NO_x that was conducted in 1984.

CDPHE issued construction permits 97-LP-0315 and 97-LP-0316 which defined requirements for the Amine Treatment System and the fugitive emissions from the Turbo-Expansion Unit. The permits required that VOC emissions from the Amine Treatment System be controlled by a thermal oxidizer and a

leak detection and repair program as stringent as that found in 40 CFR Part 60, Subpart KKK be developed and implemented for the fugitive emissions from the Turbo-Expansion Unit.

August 17, 1999 – the EPA determines La Plata A Compressor Station, La Plata B Compressor Station, and Ignacio Gas Plant are single stationary source.

Northwest Pipeline Corporation's La Plata B Compressor Station, Transwestern Pipeline Company's La Plata A Compressor Station, and Williams Field Services Ignacio Gas Plant are all owned by the same parent company, Williams Company, and thus are under common control. Additionally, the three sources are located on adjacent properties and possess the same two-digit SIC code. Therefore, the three sources are a single stationary source for Title V and PSD permitting purposes.

March 28, 2001, Consent Decree (CD) Entered into the United States District Court

Civil Action No. 01-S-0113: The EPA determined that the Turbo-Expansion Unit and the Amine Treatment System constructed in 1984 should have been subject to PSD review for VOC emissions. On February 8, 2001, the EPA published a Notice of Lodging of Consent Decree under the Clean Air Act (66 FR 9597). The CD was entered in the United States District Court on Denver, Colorado on March 28, 2001. The CD required that Williams meet emission standards and other terms and conditions set forth on the CD regarding emissions of VOCs until such time that a PSD permit has been issued by the EPA or other duly authorized State or Tribal agency or commission to which the EPA has delegated Federal PSD permitting authority. The CD required that Williams submit a PSD application to the EPA no later than 30 days after the effective date of the CD.

May 22, 2001, PSD application submitted by Williams as required by Consent Decree

January 18, 2002, PSD application submitted by Williams as required by Consent Decree

April 22, 2002, Consent Decree Entered into the United States District Court

Civil Action No. 02-B-0199: The EPA determined that the East and West Dehydrators constructed in 1991 and 1992, respectively, should have been subject to PSD review for VOC emissions. On March 11, 2002, the EPA published a Notice of Lodging of Consent Decree under the Clean Air Act (67 FR 10933). The CD was entered in the United States District Court on Denver, Colorado on April 22, 2002. The CD required that Williams meet emission standards and other terms and conditions set forth on the CD regarding emissions of VOCs until such time that a PSD permit has been issued by the EPA or other duly authorized State or Tribal agency or commission to which the EPA has delegated Federal PSD permitting authority. The CD required that Williams submit a PSD application to the EPA no later than 30 days after the effective date of the CD.

September 15, 2003, amended application to modify SO₂ and VOC emission limits in PSD and Title V applications submitted by Williams

November 19, 2003, EPA issued the initial Part 71 operating permit for Ignacio Gas Plant

April 4, 2008, Part 71 renewal application submitted by Williams

December 22, 2010, PSD Permit #PSD-SU-0027-01.00 was issued to Williams to incorporate all requirements from the 1984 PSD permit and the two Consent Decrees

November 1, 2011, Consent Decree Entered into the United States District Court

Civil Action No. 1:11-cv-02846: The EPA determined that Williams failed to timely repair four leaks at the Ignacio Gas Plant in violation of the New Source Performance Standard at 40 CFR Part 60, Subpart KKK. On November 1, 2011, the EPA published a notice of Lodging of Consent Decree under the CAA. This Consent Decree, effective on December 15, 2011, required Williams to implement an enhanced leak detection and repair program at the Ignacio Gas Plant service using optical gas imaging, for a period of five years from the effective date of the Consent Decree. The affected sources are the components in Williams' current New Source Performance Standards KKK leak detection and repair program as well as previously grandfathered components in VOC and wet gas service.

January 28, 2013, EPA issued the renewal Part 71 operating permit for Ignacio Gas Plant

f. Potential to Emit

Under RAC 1-103(51), potential to emit (PTE) is defined as the maximum capacity of a stationary source to emit a pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation, or the effect it would have on emissions, is federally enforceable.

The PTE for Ignacio Gas Plant was listed by Williams in Forms "GIS", "PTE", and the various forms "EMISS" of the Part 70 operating permit initial application. Table 3 shows PTE data broken down by each individual emission unit, as well as the total facility-wide PTE.

**Table 3 - Potential to Emit
Williams Four Corners LLC, Ignacio Gas Plant**

Emission Unit ID	Regulated Air Pollutants in tpy (with required controls)								
	NO _x	VOC	SO ₂	PM ₁₀	CO	Lead	Total HAPs	Largest Single HAP (Benzene)	GHGs (CO ₂ e mtpy)
12	11.4	0.4	0.1	0.6	6.7	0.0	0.2	0.0	9,591.0
12a	5.6	0.3	0.0	0.4	4.7	0.0	0.1	0.0	6,747.3
13	7.7	0.4	0.0	0.6	6.5	0.0	0.2	0.0	9,328.0
14	7.7	0.4	0.0	0.6	6.5	0.0	0.2	0.0	9,328.0

15	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
16	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
17	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
18	0.0	70.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0
19	0.0	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0
20	0.0	10.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0
21	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
22	38.5	5.1	37.1	0.0	23.5	0.0	1.3	0.6	0.0
23	5.8	12.3	0.0	0.0	41.7	0.0	11.6	6.8	0.0
24	0.0	10.5	0.0	33.4	0.0	0.0	0.0	0.0	0.0
25	3.0	0.2	0.2	0.2	0.6	0.0	0.0	0.0	110.4
26	2.4	0.2	0.2	0.2	0.5	0.0	0.0	0.0	87.7
27	44.8	18.2	1.4	2.6	40.8	0.0	0.4	0.0	44,357.9
28	54.1	22.1	1.7	3.2	49.4	0.0	0.5	0.0	54,262.0
29	30.6	12.5	0.7	1.3	27.9	0.0	0.2	0.0	21,105.9
30	54.1	22.1	1.7	3.2	49.4	0.0	0.5	0.0	54,262.0
31	54.1	22.1	1.7	3.2	49.4	0.0	0.5	0.0	54,262.0
32	0.0	9.7	0.0	0.0	0.0	0.0	0.3	0.0	0.0
33	0.0	9.7	0.0	0.0	0.0	0.0	0.3	0.0	0.0
Total IEUs	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	319.8	228.0	44.8	49.5	307.6	0.0	16.3	7.4	263,442.2

2. Tribal Authority

The Ignacio Gas Plant is located within the exterior boundaries of the Southern Ute Indian Reservation and is thus within Indian Country as defined at 18 U.S.C. §1151. On March 2, 2012, the EPA determined that the Southern Ute Indian Tribe of the Southern Ute Indian Reservation had met the requirements of 40 CFR §70.4(b) for full approval to administer its Clean Air Act Title V, Part 70 Permitting Program (Program). In concert with that Program approval, the EPA also found that the Tribe met the requirements of Section 301(d)(2) of the CAA and 40 CFR §49.6 for treatment “in the same manner as a state” for the purposes of issuing CAA Title V, Part 70 operating permits. The EPA promulgated its approval of the Tribe’s applications on March 15, 2012 (77 FR 15267). The requirements of the Clean Air Act Title V, Part 70 Permitting Program (Program) have been incorporated at Article II, Part 1 of the Reservation Air Code. Therefore, the Southern Ute Indian Tribe is the appropriate governmental entity to issue the Title V permit to this facility.

The Reservation Air Code: The Reservation Air Code was adopted pursuant to the authority vested in the Southern Ute Indian Tribe/State of Colorado Environmental Commission by (1) the Intergovernmental Agreement Between the Southern Ute Indian Tribe and the State of Colorado Concerning Air Quality Control on the Southern Ute Indian Reservation dated December 13, 1999, (2) tribal law (Resolution of the Council of the Southern Ute Indian Tribe No. 00-09), (3) State law (C.R.S. § 24- 62-101), and (4) as recognized in federal law (Act of October 18, 2004, Pub. L. No. 108-336, 118 Stat.1354).

NSPS and NESHAP Delegation: On September 6, 2013, the Southern Ute Indian Tribe received delegation from the EPA to incorporate by reference into the Reservation Air Code and enforce certain subparts of the new source performance standards (NSPS) and national emission standards for hazardous air pollutants (NESHAP) under Sections 111 and 112 of the Clean Air Act, respectively (78 FR 40635). These NSPS and NESHAP subparts generally apply to oil and gas operations within the exterior boundaries of the Southern Ute Indian Reservation and were adopted, unchanged, into the Reservation Air Code as Parts 2 and 3.

Southern Ute Indian Tribe Minor Source Program: The Southern Ute Indian Tribe/State of Colorado Environmental Commission is currently developing a Minor Source Program in order to fill a regulatory gap wherein sources of air pollution located on the Reservation have been subject to fewer requirements than similar sources located on land under the jurisdiction of a state air pollution control agency. Until such time that EPA approves the Minor Source Program as part of a TIP under the Tribal Authority Rule, affected sources must comply with the federal rule “Review of New Sources and Modifications in Indian Country” that was published on July 1, 2011 (76 FR 38748).

3. Applicable Requirements

The following discussion addresses a selection of the regulations from the Code of Federal Regulations (CFR) at Title 40. Note that this discussion does not include the full spectrum of potentially applicable regulations and is not intended to represent official applicability determinations. These discussions are based on the information provided by Williams in its Part 70 initial permit application and are only intended to present the information certified to be true and accurate by the Responsible Official of this facility.

Tribal Minor New Source Review (TMNSR) - 40 CFR 49

EPA promulgated the federal rule “Review of New Sources and Modifications in Indian Country”, otherwise known as the Tribal Minor New Source Review Rule (TMNSR), on July 1, 2011 (76 FR 38748). The TMNSR rule applies to all new or modified industrial facilities in Indian country with a potential to emit equal to or greater than the minor NSR thresholds but less than the major source thresholds, which are generally 100 to 250 tons per year (tpy). The minor NSR thresholds for attainment/unclassifiable areas are displayed in the table below:

40 CFR 49.153 Minor NSR Thresholds

Regulated NSR Pollutant	Minor NSR Thresholds for attainment/unclassifiable areas in tons per year (TPY)
Carbon monoxide (CO)	10
Nitrogen oxides (NO _x)	10
Sulfur dioxide (SO ₂)	10
Volatile Organic Compounds (VOC)	5
PM ₅	5
PM ₁₀	5
PM _{2.5}	3
Lead	0.1
Fluorides	1
Sulfuric acid mist	2
Hydrogen sulfide (H ₂ S)	2
Total reduced sulfur (including H ₂ S)	2
Reduced sulfur compounds (including H ₂ S)	2
Municipal waste combustor emissions	10
Municipal solid waste landfill emissions (measured as nonmethane organic compounds)	10

Starting August 30, 2011 all minor modifications at existing major NSR sources, requests for synthetic minor limitations, and the transferring of synthetic minor limits from Part 71 permits into minor NSR permits became subject to the TMNSR rule. All existing true minor sources were required to register with EPA by no later than March 1, 2013. All new minor sources constructed between August 30, 2011 and September 2, 2014 were required to submit a registration form within 90 days of beginning operation and obtain a permit if a general permit was available for that source category. All new true minor sources which are not in the oil and natural gas sector and intend to construct after September 2, 2014 are required to apply for a preconstruction permit. After March 2, 2016 all true minor sources and minor modifications in the oil and natural gas sector that intend to construct or modify will have to apply for a preconstruction permit.

Future modifications at the Ignacio Gas Plant will be subject to the TMNSR rule; however no TMNSR permits have been issued to this facility at this time.

Prevention of Significant Deterioration (PSD) - 40 CFR 52.21

PSD is a preconstruction review requirement of the CAA that applies to proposed projects that are sufficiently large (in terms of emissions) to be a “major” stationary source or “major” modification of an existing stationary source. A new stationary source, or a modification to an existing minor stationary source, is major if the proposed project has the potential to emit any pollutant regulated under the CAA in amounts equal to or exceeding specified major source thresholds, which are 100 tpy for 28 listed industrial source categories and 250 tpy for all other sources. PSD also applies to modifications at

existing major sources that cause a “significant net emissions increase” at that source. Significance levels for each pollutant are defined in the PSD regulations at 40 CFR 52.21. A modification is a physical change or change in the method of operation.

The Ignacio Gas Plant is an existing source that does not belong to any of the 28 listed source categories. The facility-wide PTE for NO_x, CO, and VOCs is greater than 250 tpy and the PTE for CO_{2e} is greater than 100,000 tpy. Consequently, the PTE for NO_x, CO, VOC, and CO_{2e} at the Ignacio Gas Plant exceeds the major source PSD thresholds and the source is classified as major for PSD permitting purposes. Therefore, potential emissions from any newly proposed construction must be compared to the PSD significance levels rather than major source thresholds when determining PSD applicability.

The EPA issued an initial PSD permit in 1984 for the Ignacio Gas Plant. In December 2010, the EPA issued another PSD permit to incorporate the requirements of the 1984 PSD permit and the two consent decrees.

New Source Performance Standards (NSPS)

40 CFR Part 60, Subpart A: General Provisions. This subpart applies to the owner or operator of any stationary source that contains an affected facility, the construction or modification of which is commenced after the date of publication of any standard in Part 60. The general provisions under Subpart A apply to sources that are subject to the specific subparts of Part 60.

As explained below, the Ignacio Gas Plant is subject to specific subparts under 40 CFR Part 60. **Therefore, the General Provisions of Part 60 apply.**

40 CFR Part 60, Subpart Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. This rule applies to steam generating units with a maximum design heat capacity of 100 MMBtu/hr or less, but greater than or equal to 10 MMBtu/hr and commenced construction, modification, or reconstruction after June 9, 1989.

According to information provided by Williams, units 12, 12a, 13, and 14, located at the Ignacio Gas Plant, are affected sources under this subpart with a maximum design heat input capacity of between 10 and 100 MMBtu/hr. However, these units commenced construction before June 9, 1989 and have not been reconstructed or modified. **Therefore, Subpart Dc does not apply.**

40 CFR Part 60, Subpart K: Standards of performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978. This rule applies to storage vessels for petroleum liquids with a storage capacity greater than 40,000 gallons. 40 CFR Part 60, Subpart K does not apply to storage vessels for petroleum or condensate stored, processed, and/or treated at a drilling and production facility prior to custody transfer.

According to information provided by Williams, the Ignacio Gas Plant has 19 pressurized storage tanks with a storage capacity greater than 40,000 gallons which store petroleum liquids. However, these tanks are designed to operate in excess of 15 pounds per square inch gauge without emissions to the atmosphere and thus, do not meet the definition of a storage vessel in this subpart. **Therefore, Subpart K does not apply.**

40 CFR Part 60, Subpart Ka: Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to June 23, 1984. This rule applies to storage vessels for petroleum liquids with a storage capacity greater than 40,000 gallons. Subpart Ka does not apply to petroleum storage vessels with a capacity of less than 420,000 gallons used for petroleum or condensate stored, processed, or treated prior to custody transfer.

According to information provided by Williams, the Ignacio Gas Plant has 19 pressurized storage tanks with a storage capacity greater than 40,000 gallons which store petroleum liquids. However, these tanks are designed to operate in excess of 204.9 kPa (15 psig) without emissions to the atmosphere and thus, do not meet the definition of a storage vessel in this subpart. **Therefore, Subpart Ka does not apply.**

40 CFR Part 60, Subpart Kb: Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced After July 23, 1984. This rule applies to storage vessels with a capacity greater than or equal to 75 cubic meters (~629 bbl). The subpart does not apply to storage vessels with a capacity greater than or equal to 151 cubic meters storing a liquid with a maximum true vapor pressure less than 3.5 kPa or with a capacity greater than or equal to 75 cubic meters but less than 151 cubic meters storing a liquid with a maximum true vapor pressure less than 15.0 kPa.

According to Williams, the Ignacio Gas Plant has tanks with a capacity greater than 75 m³ (~629 bbl or 19,813 gal), but less than 151 m³ with a vapor pressure less than 15 kPa that commenced construction after July 23, 1984, including a 24,000 gallon methanol tank, a 33,684 gallon spent lube oil storage tank, two (2) 21,000 gallon spent lube oil/water storage tanks, and two (2) 42,000 gallon produced water tanks. **These tanks meet the exemption criteria specified in §60.110b(b) and are subject to limited requirements of Subpart Kb.**

40 CFR Part 60, Subpart KKK: Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants for which construction, reconstruction, or modification commenced after January 20, 1984, and on or before August 23, 2011. This rule applies to compressors and other equipment at onshore natural gas processing facilities. As defined in this subpart, a natural gas processing plant is any processing site engaged in the extraction of natural gas liquids (NGLs) from field gas, fractionation of mixed NGLs to natural gas products, or both. NGLs are defined as the hydrocarbons, such as ethane, propane, butane, and pentane that are extracted from field gas.

Subpart KKK requires a source to comply with several requirements of 40 CFR 60, Subpart VV, Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals

Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After January 5, 1981 and on or Before November 7, 2006. Both Subpart VV and Subpart KKK regulate fugitive emissions of VOC at onshore natural gas processing plants. The regulations for Subpart VV are found at 40 CFR 60 §§60.480 through 60.489.

Natural Gas Processing Plant

Pursuant to the definitions at 40 CFR 60.631, a natural gas processing plant “means any processing site engaged in the extraction of natural gas liquids from field gas, fractionation of mixed natural gas liquids to natural gas products, or both.”

Natural Gas Liquids

Pursuant to the definitions at 40 CFR 60.631, natural gas liquids “means the hydrocarbons, such as ethane, propane, butane, and pentane that are extracted from field gas.”

Process Unit

Process units are defined as equipment assembled for the extraction of natural gas liquids from field gas, the fractionation of the liquids into natural gas products, or other operations associated with the processing of natural gas products. A process unit can operate independently if supplied with sufficient feed or raw materials and sufficient storage facilities for the products.

Applicability and Designation of Affected Facilities

The provisions of this subpart apply to the following components at onshore natural gas processing plants that commenced construction, reconstruction, or modification after January 20, 1984 and on or before August 23, 2011.

1. Compressors in VOC service or wet gas service are subject to this rule. A compressor is in VOC service if it contains or contacts a process fluid that is at least 10% VOC by weight. In wet gas service means that a piece of equipment contains or contacts the field gas before the extraction step in the process.
2. All equipment except compressors within a process unit.

A compressor station, dehydration unit, sweetening unit, underground storage tank, field gas gathering system, or liquefied natural gas unit is covered by this subpart if it is located at an onshore natural gas processing plant. If the unit is not located at the plant site, then it is exempt from the provisions of this subpart.

Equipment

Equipment means each pump, pressure relief device, open-ended valve or line, valve, compressor, and flange or other connector that is in VOC service or in wet gas service, and any device or system required by this subpart.

Subpart KKK establishes monitoring/testing requirements, recordkeeping requirements, recordkeeping requirements and reporting requirements for the following components that may be located at an onshore natural gas processing plant:

- Pumps in light liquid service
- Compressors in VOC service or wet gas service
- Pressure relief devices in gas vapor service
- Sampling connection systems
- Open-ended valves or lines
- Valves in gas/vapor or light liquid service
- Pumps and valves in heavy liquid service, pressure relief devices in light or heavy liquid service, and flanges and other connectors
- Closed vent systems and control devices
- Vapor recovery systems
- Enclosed combustion devices
- Flares

In addition, the rule establishes separate requirements for the following:

- Delay of repair of equipment for which leaks have been detected;
- Alternative means of emissions limitation for components subject to the rule; and
- Determining components that are not in VOC or wet gas service.

The Ignacio Gas Plant operates a fractionation plant to extract NGLs from the field gas, and thus meets the definition of a natural gas processing plant under this subpart. According to Williams, Emission Units 19 and 20 were installed after January 20, 1984, and before August 23, 2011, and contain components in VOC or wet gas service. **Therefore, Subpart KKK does apply.**

40 CFR Part 60, Subpart LLL: Standards of Performance for SO₂ emissions from Onshore Natural Gas Processing for which construction, reconstruction, or modification commenced after January 20, 1984, and on or before August 23, 2011. This rule applies to sweetening units and sulfur recovery units at onshore natural gas processing facilities. As defined in this subpart, sweetening units are process devices that separate hydrogen sulfide (H₂S) and carbon dioxide (CO₂) from a sour natural gas stream. Sulfur recovery units are defined as process devices that recover sulfur from the acid gas (consisting of H₂S and CO₂) removed by a sweetening unit.

According to Williams, the Ignacio Gas Plant has an amine sweetening unit that was constructed or modified after the applicability date of January 20, 1984, and on or before August 23, 2011. However, the Ignacio Gas Plant has a design capacity less than 2 long tons per day (LT/D) of

hydrogen sulfide (H₂S) in the acid gas (expressed as sulfur). **Per §60.640, the facility is required to comply with the recordkeeping requirements of §60.647(c), but is not required to comply with §§60.642 through 60.646.**

40 CFR Part 60, Subpart IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. This subpart establishes emission standards and compliance requirements for that control of emissions from stationary compression ignition (CI) internal combustion engines (ICE) that commenced construction, modification, or reconstruction after July 11, 2005, where the CI ICE are manufactured on or after specified manufacture trigger dates. The manufacture trigger dates are based on the engine type and displacement liter per horsepower (hp). For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator.

Williams provided the following information:

**Table 3 - NSPS Subpart IIII Applicability Determination
Williams Four Corners, LLC, Ignacio Gas Plant**

Unit	Serial No	Unit Description	Fuel	Maximum HP	Commence Construction, Modification, or Reconstruction Date	Install/Startup Date	Trigger Date for Applicability-Manufactured on or after
25		Waukesha H886D CI Emergency Pump Engine	Diesel	384	Prior to 07/11/2005	01/01/1978	07/01/2006
26		Caterpillar W4-3798 CI Emergency Pump Engine	Diesel	305	Prior to 07/11/2005	01/01/1985	07/01/2006

According to Williams, units 25 and 26 were manufactured prior to July 1, 2006 (the trigger date for fire pump engines) and have not been reconstructed or modified (as defined in §60.15).

Therefore, the requirements of Subpart IIII do not apply.

Should Williams propose to install a replacement engine for unit 25 or 26, which is subject to Subpart IIII, Williams will not be allowed to use the off permit changes provision, and will be required to submit a minor permit modification application to incorporate Subpart IIII requirements into the permit.

40 CFR Part 60, Subpart KKKK: Standards of Performance for Stationary Combustion Turbines. This subpart establishes emission standards and compliance schedules for the control of emissions from stationary combustion turbines that commenced construction, modification, or reconstruction after February 18, 2005.

According to Williams, the Ignacio Gas Plant has stationary combustion turbines with a heat input at peak load equal to or greater than 10.7 gigajoules (10 MMBtu) per hour which commenced construction, modification, or reconstruction after February 18, 2005. **Therefore, Subpart KKKK applies.**

40 CFR Part 60, Subpart OOOO: Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution. This subpart establishes emission standards and compliance schedules for the control of VOC and SO₂ emissions from affected facilities that commence construction, modification or reconstruction after August 23, 2011. Affected facilities under this subpart include gas wells, compressors, pneumatic controllers, storage vessels, process unit equipment, and sweetening units. The effective date for this subpart is October 15, 2012.

According to Williams, the Ignacio Gas Plant has two (2) reciprocating compressors in VOC/wet gas service that commenced construction after August 23, 2011. **Therefore, Subpart OOOO does apply.**

National Emission Standards for Hazardous Air Pollutants (NESHAP)

40 CFR Part 63, Subpart A: General Provisions. This subpart contains national emissions standards for HAPs that regulate specific categories of sources that emit one or more HAP regulated pollutants under the CAA. The general provisions under subpart A apply to sources that are subject to the specific subparts of Part 63.

As explained below, the Ignacio Gas Plant is subject to specific subparts under 40 CFR Part 63. **Therefore the General Provisions of Part 63 apply** as specified in the relevant subparts.

40 CFR Part 63, Subpart HH: National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities. This subpart applies to the owners and operators of affected units located at natural gas production facilities that are area or major sources of HAPs, and that process, upgrade, or store natural gas prior to the point of custody transfer, or that process, upgrade, or store natural gas prior to the point at which natural gas enters the natural gas transmission and storage source category or is delivered to a final end user. The affected units are glycol dehydration units, storage vessels with the potential for flash emissions, and the group of ancillary equipment, and compressors intended to operate in volatile hazardous air pollutant service, which are located at natural gas processing plants.

Throughput Exemption

Those sources whose maximum natural gas throughput, as appropriately calculated per §63.760(a)(1)(i) through (a)(1)(iii), is less than 18,400 standard cubic meters per day are exempt from the requirements of this subpart.

Source Aggregation

Major source, as used in this subpart, has the same meaning as in §63.2, except that:

- 1) Emissions from any oil and gas production well with its associated equipment and emissions from any pipeline compressor station or pump station shall not be aggregated with emissions from other similar units.

- 2) Emissions from processes, operations, or equipment that are not part of the same facility shall not be aggregated.
- 3) For facilities that are production field facilities, only HAP emissions from glycol dehydration units and storage vessels with the potential for flash emissions shall be aggregated for a major source determination.

Facility

For the purpose of a major source determination, facility means oil and natural gas production and processing equipment that is located within the boundaries of an individual surface site as defined in Subpart HH. Examples of facilities in the oil and natural gas production category include, but are not limited to: well sites, satellite tank batteries, central tank batteries, a compressor station that transports natural gas to a natural gas processing plant, and natural gas processing plants.

Production Field Facility

Production field facilities are those located prior to the point of custody transfer. The definition of custody transfer (40 CFR 63.761) means the point of transfer after the processing/treating in the producing operation, except for the case of a natural gas processing plant, in which case the point of custody transfer is the inlet to the plant.

Natural Gas Processing Plant

A natural gas processing plant is defined in 40 CFR 63.761 as any processing site engaged in the extraction of NGLs from field gas, or the fractionation of mixed NGLs to natural gas products, or a combination of both. A treating plant or gas plant that does not engage in these activities is considered to be a production field facility.

Major Source Determination for Production Field Facilities

The definition of major source in subpart HH (at 40 CFR 63.761) states, in part, that only emissions from the dehydration units and storage vessels at production field facilities shall be aggregated when comparing to the major source thresholds.

For facilities that are not production field facilities, HAP emissions from all HAP emission units shall be aggregated.

Area Source Applicability

40 CFR Part 63, Subpart HH also applies to area sources of HAPs. An area source is a HAP source whose total HAP emissions are less than 10 tpy of any single HAP or 25 tpy for all HAPs in aggregate.

This subpart requires different emission reduction requirements for glycol dehydration units found at oil and gas production facilities based on their geographical location.

Units located in densely populated areas (determined by the Bureau of Census) and known as urbanized areas with an added 2-mile offset and urban clusters of 10,000 people or more, are required to have emission controls. Units located outside these areas will be required to have the glycol recirculation pump rate optimized or operators must document that uncontrolled annual actual benzene emissions are less than 0.9 megagrams (1,984 lbs.).

Any source that determines that it is not a major source but has actual emissions of 5 tons per year of a single HAP or 12.5 tons per year of a combination of HAP (i.e. 50 percent of the major source thresholds), shall update its major source determination within 1 year of the prior determination and each year thereafter, using gas composition data measured during the preceding 12 months.

Applicability of Subpart HH to the Ignacio Gas Plant

The Ignacio Gas Plant extracts Natural Gas Liquids (NGLs) from field gas, and therefore, is considered a natural gas processing plant. NGLs and natural gas are transported to the local market via pipeline and truck loading from the plant, hence, the point of custody transfer, as defined in Subpart HH, occurs at the facility. For facilities that are not production field facilities, HAP emissions from all HAP emission units shall be aggregated for a major source determination. On the February 6, 1998 compliance date for Subpart HH the total HAP emissions at the facility were above the major source thresholds of 10 tpy of a single HAP and 25 tpy of aggregated HAPs standard. **Therefore, the Ignacio Gas Plant is subject to the major source requirements of Subpart HH.**

The affected sources at Ignacio Gas Plant include two (2) glycol dehydration units, and ancillary equipment and compressors intended to operate in volatile hazardous air pollutant (VHAP) service as determined per the requirements of §63.772(a). **Therefore, Ignacio Gas Plant is subject to the glycol dehydration unit process vent standard of §63.795 and the equipment leak standards of §63.796.**

Note: On August 16, 2012, EPA promulgated the final rule revising the standards of Subpart HH. The compliance date for the revised standards varies by affected unit. The permit has been written to allow for flexibility in compliance with the current and revised standards. Williams is responsible for compliance with any applicable provisions of Subpart HH by the respective compliance deadline.

40 CFR Part 63, Subpart HHH: National Emission Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities. This subpart applies to natural gas transmission and storage facilities that transport or store natural gas prior to entering the pipeline to a local distribution company or to a final end user, and that are a major source of hazardous air pollutant (HAP) emissions. Natural gas transmission means the pipelines are used for long distance transport (excluding processing).

According to information provided by Williams, the Ignacio Gas Plant is not part of the natural gas transmission and storage source category. **Therefore, Subpart HHH does not apply.**

40 CFR Part 63, Subpart YYYY: National Emission Standards for Hazardous Air Pollutants from Stationary Combustion Turbines. This rule establishes national emission limitations and work practice standards for HAPs emitted from stationary combustion turbines. An affected source includes any stationary combustion turbine located at a major source of HAP emissions. Affected sources under this rule are any existing, new, or reconstructed stationary combustion turbine located at a major source of HAP emissions. For the purpose of this rule, existing is defined as a stationary combustion turbine that commenced construction prior to January 14, 2003.

Stationary Combustion Turbine:

Stationary combustion turbines are defined in §63.6175 as all equipment, including but not limited to the turbine, the fuel, air, lubrication and exhaust gas systems, control systems (except emissions control equipment), and any ancillary components and sub-components comprising any simple cycle stationary combustion turbine, any regenerative/recuperative cycle stationary combustion turbine, the combustion turbine portion of any stationary combined cycle steam/electric generating system. Stationary means that the combustion turbine is not self-propelled or intended to be propelled while performing its function. Stationary combustion turbines do not include turbines located at a research or laboratory facility, if research is conducted on the turbine itself and the turbine is not being used to power other applications at the research or laboratory facility.

Major Source:

Major Source for purposes of this subpart has the same meaning as provided in 40 CFR 63.2 with the exception that emissions from any oil or gas exploration or production well (with its associated equipment) and emissions from any pipeline compressor station or pump station shall not be aggregated with emissions from other similar units, to determine whether such emission points or station are major sources, even when emission points are in a contiguous are or under common control.

Applicability of Subpart YYYY to the Ignacio Gas Plant

According to information provided by Williams, the Ignacio Gas Plant was a major source of HAPs upon commencing construction of Units 27, 28, 29, 30, and 31 in 2013. Per §63.6090(2), these units are new stationary combustion turbines for the purposes of Subpart YYYY. **Therefore, Subpart YYYY** is applicable to the Ignacio Gas Plant. However, per §63.6095(d), new lean premix gas-fired stationary combustion turbines are only required to comply with the initial startup notification requirements in §63.6145.

40 CFR Part 63, Subpart ZZZZ (RICE MACT): National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. This rule establishes national

emission limitations and operating limitations for HAPs emitted from stationary spark ignition internal combustion engines (SI ICE) and stationary compression ignition internal combustion engines (CI ICE).

For the purposes of this standard, construction or reconstruction is as defined in §63.2.

Summary of Applicability to Engines at Major HAP Sources

Major HAP Sources			
Engine Type	Horse Power Rating	New / Existing	Applicability Trigger Date
SI ICE – All ¹	≥ 500 HP	New	On or After: 12/19/2002
SI ICE – 4SRB	> 500 HP	Existing	Before: 12/19/2002
SI ICE – All ¹	≤ 500 HP	New	On or After: 6/12/2006
SI ICE – All ¹	≤ 500 HP	Existing	Before: 6/12/2006
CI ICE – All ²	≥ 500 HP	New	On or After: 12/19/2002
CI ICE – Non Emergency	> 500 HP	Existing	Before: 12/19/2002
CI ICE – All ²	≤ 500 HP	New	On or After: 6/12/2006
CI ICE – All ²	≤ 500 HP	Existing	Before: 6/12/2006

1. All includes emergency ICE, limited use ICE, ICE that burn land fill or digester gas, 4SLB, 2SLB, and 4SRB.
2. All includes emergency ICE and limited use ICE

Summary of Applicability to Engines at Area Hap Sources

Area HAP Sources			
Engine Type	Horse Power Rating	New / Existing	Applicability Trigger Date
SI ICE – All ¹	All HP	New	On or After: 6/12/2006
SI ICE – All ¹	All HP	Existing	Before: 6/12/2006
CI ICE – All ²	All HP	New	On or After: 6/12/2006
CI ICE – All ²	All HP	Existing	Before: 6/12/2006

1. All includes emergency ICE, limited use ICE, ICE that burn land fill or digester gas, 4SLB, 2SLB, and 4SRB.
2. All includes emergency ICE and limited use ICE

Applicability of 40 CFR 63, Subpart ZZZZ to the Ignacio Gas Plant:

Unit	Serial Number	Unit Description	Fuel	Site Rated HP	Commenced Construction, Reconstruction, or Modification Date	Initial Installation Date
25		Waukesha H886D CI Emergency Pump Engine	Diesel	384	Prior to 06/12/2006	01/01/1978
26		Caterpillar W4-3798 CI Emergency Pump Engine	Diesel	305	Prior to 06/12/2006	01/01/1985

According to Williams the Ignacio Gas Plant was a major source of HAPS on the Subpart ZZZZ compliance date of June 12, 2006. Units 25 and 26 are emergency compression ignition (CI) stationary RICE less than 500 site-rated HP constructed prior to June 12, 2006, and have not been reconstructed since this date. **Therefore, Units 25 and 26 are considered existing stationary RICE, and are subject to the Subpart ZZZZ major source requirements for existing emergency CI engines.**

40 CFR Part 63, Subpart DDDDD (Boiler MACT (for major sources)): National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. This rule establishes national emission limitations and operating limitations for HAPs emitted from new and existing industrial boilers, institutional boilers, commercial boilers, and process heaters that are located at major sources of HAPs. Boilers or process heaters that combust natural gas for

fuel or have a maximum designed heat input capacity less than 10 MMBtu/hr are subject to work practice standards in lieu of emission limits. For the purposes of this subpart, an affected unit is an existing unit if it was constructed prior to June 4, 2010.

The Ignacio Gas Plant was a major source of HAPs as defined by §63.7575 on the June 4, 2010 compliance date for Subpart DDDDD, and contains industrial, commercial, and institutional boilers and process heaters as defined in §63.7575. **Therefore, Subpart DDDDD does apply.**

The affected units at Ignacio Gas Plant are process heater Units 12 and 12a, and the industrial boiler Units 13 and 14.

This subpart also potentially applies to the triethylene glycol (TEG) reboilers at the facility because these units are considered process heaters under the subpart. However, the TEG reboilers are not subject to this subpart as they are listed as an affected source under Subpart HH, per §63.7491(h).

Compliance Assurance Monitoring (CAM) Rule

40 CFR Part 64: Compliance Assurance Monitoring Provisions. According to 40 CFR 64.2(a), the CAM rule applies to each Pollutant Specific Emission Unit (PSEU) at a major source that is required to obtain a Part 70 or Part 71 permit if the unit satisfies all of the following criteria:

- 1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant other than an emissions limitation or standard that is exempt under §64.2(b)(1);

“§64.2(b)(1): Exempt emission limitations or standards. The requirements of this part shall not apply to any of the following emission limitations or standards:

- (i) *Emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to Section 111 or 112 of the Act;*
- (ii) *Stratospheric ozone protection requirements under Title VI of the Act;*
- (iii) *Acid Rain Program requirements pursuant to Sections 404, 405, 406, 407(a), 407(b) or 410 of the Act;*
- (iv) *Emissions limitations or standards or other applicable requirements that apply solely under an emissions trading program approved or promulgated by the Administrator under the Act that allows for trading emissions with a source or between sources;*
- (v) *An emissions cap that meets the requirements specified in §70.4(b)(12) or §71.6(a)(13)(iii) of this chapter;*
- (vi) *Emission limitations or standards for which a Part 70 or 71 permit specifies a continuous compliance determination method, as defined in §64.1.”*

“§64.1: Continuous compliance method means a method, specified by the applicable standard or an applicable permit condition, which:

(1) Is used to determine compliance with an emission limitation or standard on a continuous basis, consistent with the averaging period established for the emission limitation or standard; and
(2) Provides data either in units of the standard or correlated directly with the compliance limit.”

- 2) The unit uses a control device to achieve compliance with any such limit or standard; and
- 3) The unit has pre-control device emissions of the applicable regulated pollutant that are equal to or greater than 100% of the amount, in tons per year, required for a source to be classified as a major source.

According to Williams, the CAM requirements specified at 40 CFR Part 64 apply to Units 15, 16, and 17 with respect to the VOC emission limits identified in PSD Permit #PSD-SU-0027-01.00.

Chemical Accident Prevention Program

40 CFR Part 68: Chemical Accident Prevention Provisions. This rule applies to stationary sources that manufacture, process, use, store, or otherwise handle more than the threshold quantity of a regulated substance in a process. Regulated substances include 77 toxic and 63 flammable substances which are potentially present in the natural gas stream entering the facility and in the storage vessels located at the facility. The quantity of a regulated substance in a process is determined according to the procedures presented under §68.115. §68.115(b)(1) and (2)(i) indicate that toxic and flammable substances in a mixture do not need to be considered when determining whether more than a threshold quantity is present at a stationary source if the concentration of the substance is below one percent by weight of the mixture. §68.115(b)(2)(iii) indicates that prior to entry into a natural gas processing plant, regulated substances in naturally occurring hydrocarbon mixtures need not be considered when determining whether more than a threshold quantity is present at a stationary source. Naturally occurring hydrocarbon mixtures include condensate, field gas, and produced water.

According to Williams, the Ignacio Gas Plant does have regulated substances above the threshold quantities in this rule. **Therefore the facility is subject to the requirement to develop and submit a risk management plan.**

Stratospheric Ozone and Climate Protection

40 CFR Part 82, Subpart F: Air Conditioning Units. According to information provided by Williams, no maintenance, service, repair or disposal of any equipment containing Class I or Class II refrigerants chlorofluorocarbons (CFCs) occurs at Ignacio Gas Plant. However, if Williams were to engage in any of the afore mentioned activities it must comply with the standards of part 82, Subpart F for recycling and emissions reduction if they service, maintain, or repair the air conditioning units in any way or if they dispose of the units.

40 CFR Part 82, Subpart H: Halon Fire Extinguishers. According to information provided by Williams, there are no halon fire extinguishers at Ignacio Gas Plant. However, should Williams obtain any halon fire extinguishers, then it must comply with the standards of 40 CFR Part 82, Subpart H for halon emissions reduction, if it services, maintains, tests, repairs, or disposes of equipment that contains halon or uses such equipment during technician training. Specifically, Williams would be required to comply with 40 CFR Part 82 and submit an application for a modification to this Title V permit.

Mandatory Greenhouse Gas Reporting

40 CFR Part 98: Mandatory Greenhouse Gas Reporting. This rule requires sources above certain emission thresholds to calculate, monitor, and report greenhouse gas emissions. The requirements of 40 CFR Part 98 and CAA §307(d)(1)(V), the CAA authority under which 40 CFR Part 98 was promulgated, however, need not be included in a tribal-issued part 70 permit because those requirements are not included in the definition of “applicable requirement” in either 40 CFR part 70 or RAC 1-103(11). Although the rule is not an applicable requirement under 40 CFR Part 70 or the RAC, the source is not relieved from the requirement to comply with the rule separately from compliance with its Part 70 operating permit. It is the responsibility of each source to determine whether Part 98 is applicable and to comply, if necessary.

4. Public Participation

a. Public Notice

Per RAC §2-109, all Part 70 draft operating permits shall be publicly noticed and made available for public comment. Public notice is given by publication in a newspaper of general circulation in the area where the source is located or in a state publication designed to give general public notice, to persons on a mailing list developed by the Tribe, including those who request in writing to be on the list, and by other means if necessary to assure adequate notice to the affected public. If an interested person would like to be added to the Tribe’s mailing list to be informed of future actions on permits issued by the Tribe, please send your name and address:

by United State Postal Service to:

Southern Ute Indian Tribe
Environmental Programs Division
Part 70 Program
PO Box 737 MS #84
Ignacio, Colorado 81137

by any other delivery service to:

Southern Ute Indian Tribe
Environmental Programs Division
Part 70 Program
398 Ouray Drive
Ignacio, Colorado 81137

Public notice for the draft permit will be published in the Durango Herald, in order to provide opportunity for public comment on the draft permit and the opportunity to request a public hearing.

b. Opportunity for Comment

Members of the public will be given an opportunity to review a copy of the draft permit prepared by the Tribe, the application, the statement of basis for the draft permit, and all supporting materials for the draft permit. Copies of these documents are available at:

Southern Ute Indian Tribe
Environmental Programs Division
Air Quality Program
71 Mike Frost Way
Ignacio, Colorado 81137

All documents are available for review at the Southern Ute Indian Tribe's Environmental Programs Division office Monday through Friday from 9:00 a.m. to 4:00 p.m. (excluding holidays).

Any interested person may submit written comments on the draft Part 70 operating permit during the public comment period. The Tribe will consider and address comments in making a final decision on the permit. The Tribe keeps 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, should raise all reasonably ascertainable issues and submit all arguments supporting his or her position by the close of the public comment period. Any supporting materials submitted must be included in full and may not have been incorporated by reference, unless the material has already been submitted as part of the administrative record in the same proceeding or consists of Environmental Commission, tribal, 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 the Part 70 Permit Contact at the addresses listed above, by stating the nature of the issues to be raised at the public hearing. Based on the number of hearing requests received, the Tribe will hold a public hearing whenever it finds there is a significant degree of public interest in a draft operating permit. The Tribe 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.

d. Public Petitions to the Administrator

In the event the Administrator of the United States Environmental Protection Agency does not object to issuance of the permit, on the basis that it would not be in compliance with applicable requirements, within its 45-day review period, any person may then petition the Administrator within 60 days after the expiration of the Administrator's 45-day review period to make such objection. Any such petition must be based only on objections to the permit that were raised with reasonable specificity during the public comment period unless the petitioner demonstrates that it was impracticable to raise such objections

within such period, or unless the grounds for such objections arose after such period. If the administrator objects to a permit as a result of this petition, the Tribe shall not issue the permit until the Administrator's objection has been resolved, except that a petition for review does not stay the effectiveness of a permit or its requirements if the permit was issued after the end of the 45-day review period and before the Administrator's objection.

e. Appeal of Permits

Within 60 days after the Tribe's final permit action, an applicant, any person who filed comments on the draft permit or participated in the public hearing, and any other person who could obtain judicial review of that action under applicable law, may appeal to the Environmental Commission in accordance with RAC 2-109(8) and the Commission's Procedural Rules.

Petitions for administrative review of final permit actions can be filed after the deadline designated by the Commission only if they are based solely on grounds arising after the deadline for administrative review has passed. Such petitions shall be filed no later than 60 days after the new grounds for review arise. If the final permit action being challenged is the Tribe's failure to take final action, a petition for administrative review may be filed any time before the Tribe denies or issues the final permit.

f. Notice to Affected States/Tribes

As described in RAC § 2-109(3), public notice will be given by notifying all affected programs. The following entities will be notified:

- State of Colorado, Department of Public Health and Environment
- State of New Mexico, Environment Department
- Ute Mountain Ute Tribe, Environmental Programs Department
- Navajo Tribe, Navajo Nation EPA
- Jicarilla Tribe, Environmental Protection Office
- National Park Service, Air Resources Division, Denver, CO
- U.S. Department of Agriculture, United States Forest Service, Rocky Mountain Region