



**Air Pollution Control
Title V Permit to Operate
Statement of Basis for Permit No V-SUIT-0028-2019.00
April 29, 2019**

**El Paso Natural Gas Company, LLC
Bondad Compressor Station
Southern Ute Indian Reservation
La Plata County, Colorado**

1. Facility Information

a. Location

The Bondad Compressor Station, owned and operated by El Paso Natural Gas Company, LLC. (EPNG), is located within the exterior boundary of the Southern Ute Indian Reservation. The exact location is SE ¼ of Section 13, T33N, R9W, at latitude 37.098056 and longitude -107.77. The Mailing address is:

El Paso Natural Gas Company, LLC
Bondad Compressor Station
2 North Nevada Avenue
Colorado Springs, CO 80903

b. Contacts

Facility Contact:

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c. Description of Operations

According to EPNG's permit application, the Bondad Compressor Station is a natural gas compression facility located within the exterior boundaries of the Southern Ute Indian Reservation in southwestern Colorado. The Bondad Compressor Station receives gas from a nearby processing plant. The gas enters the facility through inlet scrubbers which knock out small quantities of water and pipeline liquids. The gas is then compressed by three (3) natural gas-fired turbine compressors into the transmission pipeline.

The facility was constructed in December 1981 with the installation of two 2782-hp Solar Centaur natural gas turbine-driven compressors and one natural gas reciprocating engine for auxiliary power generation

during purchase power outages. Emissions from the two original turbines were permitted by the Colorado Department of Public Health and Environment. In 1992, a third regenerative-cycle turbine was added (Solar Centaur T4000, 2786-hp). In 1994, the two original turbines were converted from simple cycle to regenerative cycle. In 1997, increases to the NO_x emission limits were incorporated into the permits for the original two turbines. Pursuant to a Compliance Order on Consent from the CDPHE, all three turbines were replaced with simple-cycle Solar Centaur turbines.

d. List of all Units and Emission-Generating Activities

EPNG provided the information contained in Tables 1 and 2 in its part 70 permit renewal application. Table 1 lists emission units and emission generating activities, including any air pollution control devices. Emission units identified as “insignificant” emitting units (IEUs) are listed separately in Table 2.

Table 1 – Emission Units

Emission Unit ID	Description				Control Equipment
	Solar Centaur 50-6202L Simple-Cycle, Natural Gas-Fired Turbine 42.72 MMBtu/hr				None
A-01	Serial No.	CC80013	Install Date:	3/19/2004	
A-02	Serial No.	CC80014	Install Date:	2/29/2004	
	Solar Centaur 50-6202LS Simple Cycle, Natural Gas-Fired Turbine 42.72 MMBtu/hr				None
B-01	Serial No.	CC91308	Install Date:	4/28/2004	
	Waukesha F1197GU Natural Gas-Fired Emergency 4SRB Reciprocating Internal Combustion Engine, 235 Site-Rated HP				None
A-AUX-01	Serial No.	360792	Install Date:	1981	

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.

EPNG stated in its Part 70 permit renewal application that the emission units in Table 2, below, are insignificant.

Table 2 – Insignificant Emission Units

Emission Unit ID	Amount	Description	Size	Units
N/A	1	Natural Gas-Fired Building Heater	0.25	MMBtu/hr
N/A	1	Used Oil Tank	107	bbl
N/A	1	Lube Oil Storage Tank	210	bbl
N/A	1	Lube Oil Day Tank	34	bbl
N/A	N/A	Fugitive Component VOC Emissions	N/A	N/A
N/A	N/A	VOC Emissions from Unit Blowdowns	N/A	N/A
N/A	N/A	VOC Emissions from Expansion Gas	N/A	N/A
N/A	N/A	VOC Emissions from Station ESD	N/A	N/A
N/A	N/A	Miscellaneous Chemicals for Maintenance / Operation	<500	gal
N/A	N/A	Pig Receiver	N/A	N/A
N/A	N/A	Pig Launcher	N/A	N/A

e. Facility Construction and/or Permitting History

The Bondad Compressor Station was constructed in December 1981. EPA Region 8 issued the initial part 71 permit, # V-SU-0028-00.00, in June, 2001. The first renewal of the Part 71 permit was issued in October 2007. In January 2008 and October 2009, EPA issued part 71 permit # V-SU-0028-06.01 and # V-SU-0028-06.02, respectively, after EPNG requested separate administrative amendments. The part 71 permit was replaced by the initial part 70 permit, # V-SUIT-0028-2014.00. A renewal permit, V-SUIT-0028-2019.00, was issued on April 29, 2019. No preconstruction permits have been issued to this facility.

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 Bondad Compressor Station was listed by EPNG in Forms “GIS”, “PTE”, and the various forms “EMISS” of the Part 70 operating permit renewal 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

Emission Unit ID	Regulated Air Pollutants^{1,2} in tpy								
	NO_x	VOC	SO₂	PM_{total}	CO	Lead	Total HAPs	Largest Single HAP (CH₂O)	GHGs (CO₂e mtpy)
A-01	92.3	0.65	0.64	1.24	22.8	N/A	0.19	0.13	21,905
A-02	92.3	0.65	0.64	1.24	22.8	N/A	0.19	0.13	21,905
B-01	32.2 ³	1.0 ³	0.64	1.24	45.0 ³	N/A	0.19	0.13	21,905
A-AUX-01	2.8	0.06	<0.01	0.01	5.1	N/A	0.02	0.01	62
IEU	0.3	0.1	0.0	0.0	0.1	N/A	0.0	0.0	4,279
TOTAL	219.9	2.5	1.9	3.7	95.8	N/A	0.6	0.4	70,056

1. Uncontrolled NO_x, CO, and VOC emissions for Units A-01, A-02, and B-01 are based on site-specific ratings performed by Solar. Emissions for Unit A-AUX-1 are based upon engine manufacturer emission factors.
2. GHG emissions calculations for combustion sources based on 40 CFR 98 Subpart C, 98.33(a)(1)(i), Tier 1 Methodology, Equation C-1 and using source specific heat input.
3. NO_x, CO, and VOC annual emissions include an estimated 1314 hours (15%) at <0°F.

2. Tribal Authority

The Bondad Compressor Station 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 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).

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.

Since the Bondad Compressor Station is located in Indian country, the State of Colorado's implementation plan does not apply to this source. In addition, no tribal implementation plan (TIP) has been submitted and approved for the Southern Ute Indian Tribe, and EPA has not promulgated a federal implementation plan (FIP) for the Southern Ute Indian Reservation. Therefore, Bondad Compressor Station is not subject to any implementation plan.

Tribal Minor New Source Review Program: Minor sources of air pollution located within the Southern Ute Indian Reservation exterior boundaries must comply with either the "Federal Implementation Plan for Managing Air Emissions from True Minor Sources in Indian Country in the Oil and Natural Gas Production and Natural Gas Processing Segments of the Oil and Natural Gas Sector" listed at 40 CFR §49.101 – 105 or the "Federal Minor New Source Review Program in Indian Country" listed at 40 CFR §49.151 – 164.

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 EPNG in its Part 70 permit renewal application and are only intended to present the information certified to be true and accurate by the Responsible Official of this facility.

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 Bondad Compressor Station is not a PSD named source. Therefore, the PTE threshold for determining PSD applicability for this source is 250 tpy for criteria pollutants. The PTE of regulated pollutants at this facility are currently below major source thresholds, therefore, this site is not subject to the requirements of PSD.

Periodic Monitoring

The Tribe may incorporate periodic monitoring requirements into a Part 70 permit when an applicable requirement does not require sufficient periodic testing or instrumental or non-instrumental monitoring to yield reliable data from the relevant time period that are representative of the source's compliance with the permit (RAC 2-110(5)(b)).

Periodic monitoring requirements have been incorporated into the Tribe's Part 70 permit for the Bondad Compressor Station. The turbine engines at Bondad Compressor Station are subject to the requirements of 40 CFR Part 60 Subpart GG. This subpart contains insufficient periodic monitoring requirements to assure compliance with the applicable NOx limit for turbines in §60.332; only requiring a one-time compliance test and no periodic monitoring. 40 CFR 60.334(c) provides the Tribe authority to allow El Paso to demonstrate compliance with the applicable NOx emission limit under §60.332 by using a previously approved procedure for monitoring, which in this case, is the Portable Analyzer Monitoring Protocol approved by EPA on January 24, 2008. Therefore, this permit includes the following periodic monitoring:

1. The permittee shall measure NOx emissions from Units A-01, A-02, and B-01 at least once every quarter to show compliance with the requirements of 40 CFR 60.332(a)(2). To meet this requirement, the permittee shall measure the NOx emissions from the turbine using a portable analyzer and approved monitoring protocol. The portable analyzer specifications and monitoring protocols that have already been approved by the EPA for the emission units in this permit may be used in lieu of new protocols unless the Tribe requires the submittal and approval of new portable analyzer specification and monitoring protocols.

The additional permit provisions outline an initial NOx emission monitoring frequency of at least once each quarter in order to show compliance with 40 CFR 60.332. The Tribe determined the frequency of required monitoring of NOx emissions for turbine units A-01, A-02, and B-01, may be reduced to semiannual if after four consecutive quarterly NOx monitoring periods, the results of the measurements are less than 75% of the emission limit. If the result from any semi-annual measurement is greater than 75% of the emission limit, Bondad Compressor Station must return to the initial monitoring frequency.

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 Bondad Compressor Station is subject to 40 CFR Part 60, Subpart GG. **Therefore, the General Provisions of Part 60 apply.**

40 CFR Part 60, Subpart D, Db, and Dc: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. NSPS Subparts D, Db, and Dc apply to steam generating units based on size requirements and commencement of construction dates.

According to EPNG, the Bondad Compressor Station does not have any affected units under these subparts. **Therefore, Subparts D, Db, and Dc do not apply.**

40 CFR Part 60, Subpart K, Ka, and Kb: Standards of performance for Storage Vessels for Petroleum Liquids and for Volatile Organic Liquid Storage Vessels. These regulations apply to certain petroleum and volatile organic liquid storage vessels.

According to EPNG, the Bondad Compressor Station does not have any tanks affected by these subparts based on their capacity, vapor pressure, or construction dates. **Therefore, Subparts K, Ka, and Kb do not apply.**

40 CFR Part 60, Subpart GG: Standards of Performance for Stationary Gas Turbines. This rule applies to stationary gas turbines, with a heat input at peak load equal to or greater than 10.7 gigajoules per hour (10 MMBtu/hr), that commenced construction, modification, or reconstruction after October 3, 1977.

According to EPNG, turbine units A-01, A-02, and B-01 have a heat input at peak load equal to or greater than 10.7 gigajoules per hour and commenced construction after October 3, 1977. **Therefore, Subpart GG does apply.**

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.

According to EPNG, the Bondad Compressor Station is not a natural gas processing plant. **Therefore, Subpart KKK does not 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 EPNG, the Bondad Compressor Station does not have sweetening or sulfur recovery units at the facility, nor is it a natural gas processing plant. **Therefore, Subpart LLL does not apply.**

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 the control of emissions from stationary combustion ignition (CI) internal combustion engines (ICE) that commence construction (which for the purposes of this subpart is the date the engine is ordered by the owner or operator) after July 11, 2005 and are manufactured as a certified National Fire Protection Association (NFPA) fire pump engine after July 1, 2006, or are manufactured after April 1, 2006 and are not fire pump engines.

According to EPNG, there are no stationary compression ignition (CI) internal combustion engines (ICE) located at Bondad Compressor Station. **Therefore, Subpart IIII does not apply.**

40 CFR Part 60, Subpart JJJJ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. This subpart establishes emission standards and compliance requirements for the control of emissions from stationary spark ignition (SI) internal combustion engines (ICE) that commenced construction, modification or reconstruction after June 12, 2006, where the SI ICE are manufactured on or after specified manufacture trigger dates. The manufacture trigger dates are based on the engine type, fuel used, and maximum engine horsepower.

For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator (See 40 CFR 60.4230(a)).

EPNG provided the following information:

**Table 4 - NSPS Subpart JJJJ Applicability Determination
El Paso Natural Gas Company, LLC., Bondad Compressor Station**

Unit	Serial No	Unit Description	Fuel	Maximum HP	Manufacture/ Commence Construction, Modification, or Reconstruction Date	Install/ Startup Date	Trigger Date for Applicability- Manufactured on or after
A-AUX-01	360792	Waukesha F1197 GU Reciprocating Engine	Natural Gas	235	Prior to June 12, 2006	1981	1/1/2009

1. Per EPNG, this engine has not been modified or reconstructed (as defined in Part 60) since June 12, 2006.

According to EPNG, emission unit A-AUX-01 was manufactured prior to January 1, 2009, the trigger date for emergency engines with a maximum horsepower greater than 25, and has not been modified or reconstructed. **Therefore, Subpart JJJJ does not apply.**

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. The rule applies to stationary combustion turbines with a heat input at peak load equal to or greater than 10.7 gigajoules (10 MMBtu) per hour.

According to EPNG, the turbines at the Bondad Compressor Station are not subject to this regulation because they were constructed before the rule applicability date and were not reconstructed or modified after February 18, 2005. **Therefore, Subpart KKKK does not apply.**

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 EPNG, the Bondad Compressor Station does not have any affected facilities under the rule that commenced construction, modification, or reconstruction after August 23, 2011. **Therefore, Subpart OOOO does not apply.**

40 CFR Part 60, Subpart OOOOa: Standards of Performance for Crude Oil and Natural Gas Facilities. This subpart establishes emission standards and compliance schedules for the control of the pollutant greenhouse gases (GHG) from affected facilities in the crude oil and natural gas source category that commence construction, modification or reconstruction after September 18, 2015. Affected facilities under this subpart include gas wells, compressors, pneumatic controllers, pneumatic pumps, storage vessels, and the collection of fugitive emission components at well sites and compressor stations.

According to EPNG's application, the Bondad Compressor Station is not a natural gas processing plant and does not have gas wells, storage vessels, continuous-bleed pneumatic devices, or compressors that have been constructed, modified, or reconstructed after September 18, 2015. **Therefore, the facility is not subject to Subpart OOOOa.**

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 Bondad Compressor Station is subject to 40 CFR 63 Subpart ZZZZ. **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 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 La Plata A Compressor Station

According to EPNG, the Bondad Compressor Station is a natural gas transmission compressor station located downstream of a processing plant, and thus does not meet the definition of an oil and natural gas production facility. **Therefore, Subpart HH does not apply.**

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 EPNG, the Bondad Compressor Station is an area source of HAPs as defined by Subpart HHH. This MACT standard only applies to major sources of HAPs at this time. **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. The affected source includes the stationary combustion turbine located at a major source of HAP emissions.

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 Bondad Compressor Station

According to EPNG, the Bondad Compressor Station is an area source as defined in Subpart YYYY. This subpart affects stationary combustion turbines located at a major source of HAP emissions. **Therefore Subpart YYYY does not apply.**

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

Table 5 - Applicability of 40 CFR 63, Subpart ZZZZ to the Bondad Compressor Station:

Unit	Serial Number	Unit Description	Fuel	Site Rated BHP	Commenced Construction, Reconstruction, or Modification Date	Installation Date
A-AUX-01	360792	Waukesha F1197 GU 4SRB Emergency RICE	Natural Gas	235	Prior to 6/12/2006	1981

According to EPNG, the Bondad Compressor Station is an area source as defined in Subpart ZZZZ. Unit A-AUX-01 is an emergency four stroke rich burn (4SRB) stationary RICE < 500 site-rated hp constructed before June 12, 2006, and has not been reconstructed since this date. **Therefore, unit A-AUX-01 is considered existing emergency 4SRB stationary RICE, and must comply with the applicable requirements of Subpart ZZZZ.**

40 CFR Part 63, Subpart DDDDD (Boiler MACT): 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.

According to EPNG, the Bondad Compressor Station is not a major source as defined in this subpart or in 40 CFR 63, Subpart HH for oil and gas production facilities. **Therefore, Subpart DDDDD does not apply.**

40 CFR Part 63, Subpart JJJJJ: National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers. This rule establishes national emission standards and operating limitations for HAPs emitted from new and existing industrial boilers, institutional boilers, and commercial boilers that are fueled by coal, biomass, or oil and are located at area sources of HAPs. For the purposes of this subpart, an affected unit is an existing unit if it was constructed prior to June 4, 2010.

According to EPNG, there are no industrial, commercial, or institutional boilers located at the Bondad Compressor Station. **Therefore, Subpart JJJJJJ does not apply.**

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 EPNG, the turbines at the Bondad Compressor Station are subject to an emission limitation at 40 CFR Subpart GG; however, no active control device is required to meet these emission limitations. In particular for Unit B-01, the SoLoNOx technology is a passive control device that prevents the regulated pollutant from forming. Furthermore, the units' uncontrolled emission rates are not greater than major source thresholds. **Therefore, CAM does not apply.**

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 EPNG, the Bondad Compressor Station is regulated under 49 CFR Parts 192, 193, or 195 (Department of Transportation Office of Pipeline Safety Regulations). **Therefore, the facility is not subject to 40 CFR 68.**

Stratospheric Ozone and Climate Protection

40 CFR Part 82: Based on EPNG's application, EPNG does not produce, transform, destroy or import controlled substances defined by Subpart A of this regulation. No servicing of motor vehicle air conditioners occurs at this facility as described at Subpart B; nor does servicing, repair, or disposal of appliances by EPNG as regulated under Subpart F. Certified contractors perform all servicing. Based on EPNG's application, EPNG does not sell or distribute products listed in Subpart C of 40 CFR 82, and does not store ozone-depleted substances requiring labeling under Subpart E. Therefore Subpart G requirements (Significant New Alternative Policy Program) do not apply. **Therefore, the requirements under 40 CFR 82 are not applicable.**

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:

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

by any other delivery service to:

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

Public notice for the draft permit was published in the Durango Herald and Southern Ute Drum on February 8, 2019 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 were 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 were on the Southern Ute Air Quality Program webpage at <https://www.southernute-nsn.gov/justice-and-regulatory/epd/air-quality/>, and at:

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

All documents were 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 was given the opportunity to submit written comments on the draft Part 70 operating permit during the public comment period. The Tribe has considered and addressed 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 believed any condition of the draft permit was inappropriate, could 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 have been included in full and may not have been incorporated by reference, unless the material had already been submitted as part of the administrative record in the same proceeding or consisted 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