



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

MAY 17 2016

Honorable Kurt Riley
Governor
Pueblo of Acoma
P.O. Box 309
Acoma, NM 87034

Re: Notification of Consultation and Coordination regarding the EPA Region 6 Issuance of a Synthetic Minor New Source Review Permit for New Mexico Gas Company Redonda Station.

Dear Governor Riley:

The U.S. Environmental Protection Agency (EPA) is initiating consultation and coordination with federally-recognized Indian Tribes adjacent to the Pueblo of Laguna where the New Mexico Gas Company (NMGC) Redonda Compressor Station is located. The NMGC submitted to EPA Region 6 a synthetic minor new source review (MNSR) permit application on April 29, 2013 to memorialize their existing operations and to limit their emissions of nitrogen oxides and carbon monoxide below title V major air emission source thresholds.

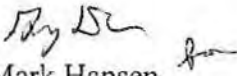
This consultation and coordination process will be conducted in accordance with the *EPA Policy on Consultation and Coordination with Indian Tribes*) <https://www.epa.gov/sites/production/files/2013-08/documents/cons-and-coord-with-indian-tribes-policy.pdf> The EPA invites you and your designated consultation representative(s) to participate in this process. The EPA's anticipated timeline for the consultation and coordination period is expected to extend from May 17, 2016 through July 15, 2016.

Enclosed is a consultation and coordination plan for this action that includes an executive summary description of the action under consultation and the process the EPA intends to follow, including a timeline for the consultation and coordination period and information on how you can provide input on this action. The permit application and information for this project is available on the EPA Region 6 website at: <http://www.epa.gov/caa-permitting/tribal-nsr-permits-epas-south-central-region> .

EPA is offering this consultation at least 60 days prior to the projected publication date of a draft permit and commencement of the public comment period. The intent of the early consultation is to provide you with an opportunity to ask questions about information contained in the permit application or the regulatory process, and for EPA to address any concerns you may have, prior to publishing a draft permit. Once the permit is published and the comment period begins, any comments received, will be documented and responded to in the Agency's official Response to Comments and made public in accordance with EPA regulations for public notice at 40 CFR 124 and 40 CFR 49.159.

Should you have any questions on this action or if you would like to request alternative arrangements to the process or schedule outlined in the consultation plan, please contact Jeff Robinson at 214-665-7250. I look forward to hearing from you about your interest on this matter, and respectfully ask for a response to this letter within 30 days of the date of this letter.

Sincerely,


Mark Hansen
Associate Director
Multimedia Division

Enclosures

cc: Donna Martinez, Acting Environmental Director
dmartinez@puebloofacoma.org

ENCLOSURE

Tribal Consultation and Coordination Process and Timeline For New Mexico Gas Company Synthetic Minor Permit Issuance

Date	Event	Contact Information
May 17, 2016	Consultation Letter Invite to Adjacent Tribal Nations	Jeff Robinson Air Permits Section Chief 214-665-7250 Or Bonnie Braganza EPA Region 6 1445 Ross Ave Dallas TX 75202 Braganza.bonnie@epa.gov 214-665-7340
Tribal Response June 17, 2016	Yes or No for consultation	
*End July 15, 2016	If consultation request is received and is ongoing, this date will be extended so long as the tribal consultation is initiated prior to this date.	
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* September 2, 2016	End of public comment period.	
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* These dates are subject to change should we receive request for consultation and/or public comments are received during the 30 day public comment period.

EXECUTIVE SUMMARY

New Mexico Gas Company (NMGC)

CURRENT OPERATIONS:

NMGC operates the Redonda Compressor Station (Redonda) located on the Pueblo of Laguna in Valencia County, New Mexico. NMGC acquired the Redonda Compressor Station in early 2009 as a part of the acquisition of all assets belonging to the Public Service Company of New Mexico (PNM) business. This is an existing facility and there have been no major changes in the operation of the facility since NMGC acquired Redonda, except for the installation of an emergency generator for safety reasons. Redonda's primary compressor engines only operate when additional compression is needed to handle specific quantities of gas within the pipeline. The compression station is an unmanned facility and NMGC is a local utility distribution company that provides natural gas service to 19 tribal nations in New Mexico.

An emergency generator fueled by natural gas or propane was added in 2013 to provide emergency power to the instrumentation and lighting during power outages at the remote location.

The majority of emissions from the facility are from combustion of natural gas in two compressor engines with some minimal VOC emissions (<0.6 tpy) from tanks (storing pipeline liquids, ethylene glycol, used oil and wastewater) associated filters and separators at the facility.

LOCATION:

The Redonda compressor station is at: 34.8924 Latitude and -107.10662 Longitude outside of Rio Purco, New Mexico, at an elevation of approximately 5390 ft.



SUMMARY OF EPA FEDERAL ACTION

Upon receipt of the NMGC permit application and additional information received by EPA from the company, we are currently processing a draft synthetic minor NSR permit for NMGC. This permitting action will allow NMGC to continue operations and have practically enforceable monitoring and recordkeeping provisions to minimize CO and NO_x emissions that will remain below major source thresholds.

Since this is an existing operation, the permit will restrict any additional emissions from this operation and shall require the use of a control device to reduce of oxides of nitrogen (NO_x) and carbon monoxide (CO) emissions from one of the compressors to maintain the emissions below major emission source thresholds.

NSR REGULATORY REQUIREMENTS:

NMGC has complied with the regulatory requirement requesting a synthetic minor new source review permit application (40 CFR § 49.158) and with the source registration requirements of 40 CFR § 49.160.

The EPA has determined that the emissions from the continued operation of the existing facility will not require a detailed air quality impacts evaluation (40 CFR § 49.158(d)), since the facility has not modified its operation, and because Valencia County is currently in attainment with the national ambient air quality standards (NAAQS) for all pollutants based on monitoring data of NO₂ and Ozone at the nearest NMED monitoring stations. In addition, the current air quality monitoring data indicates that monitored NAAQS concentrations have decreased over the recent years. See the air quality impacts discussion below for more information.

EPA will draft the permit to meet all the requirements in 40 CFR § 49.151 - 49.159. The permitting action for this facility will specify any necessary monitoring and recordkeeping provisions for NMGC's current operations with no additional authorizations of new emissions or construction. The facility uses a catalyst on one compressor engine to reduce the NO_x and CO emissions below the major source emission thresholds and the permit will require compliance with the operation of the compressor engine with the catalyst at all times.

Endangered Species Act (ESA) Regulatory Requirements:

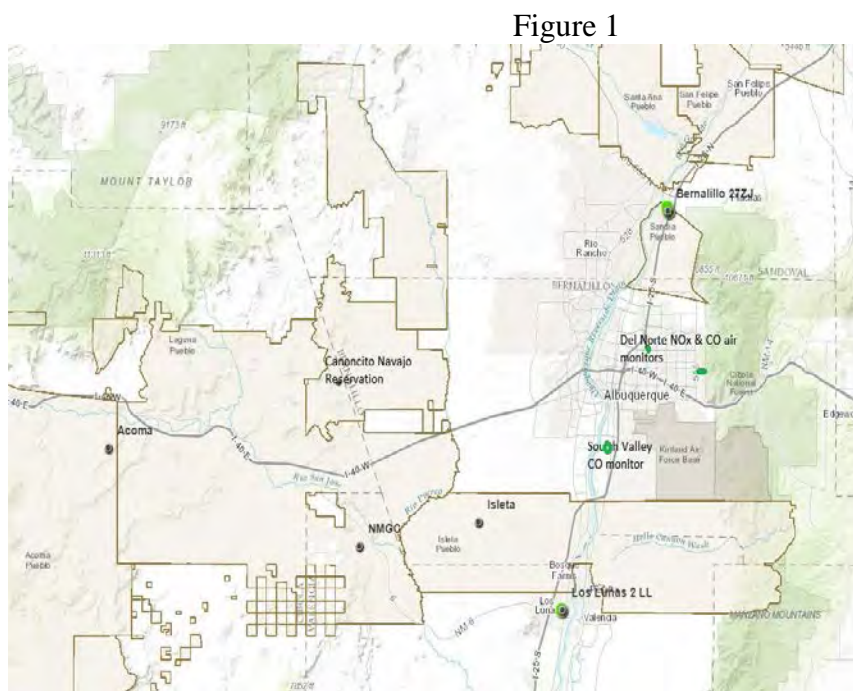
Pursuant to Section 7(a)(2) of the Endangered Species Act (ESA) (16 U.S.C. 1536) and its implementing regulations at 50 CFR Part 402, EPA has concluded that issuance of the proposed synthetic minor NSR permit will have "no effect" on any of the six listed species. The applicant provided documentation as part of the permit application indicating that for the six listed species in the county there are no known occurrences, no designated critical habitat, and no suitable habitat. Additionally there is no increase in emissions and the permit does not allow any new construction activities that may otherwise effect the listed species.

National Historic Preservation Act Regulatory (NHPA) Requirements

Pursuant to 36 CFR § 800.3(a)(1) of NHPA, EPA has determined that the proposed action does not have the potential to cause effects on historic properties, assuming that such properties were present because the permit does not authorize any new construction or ground disturbances, nor has the applicant proposed such activities. An archaeological survey was conducted at the time of construction of the facility in 1990. The survey¹ report indicated a “lack of significant intact cultural resources” were present at the facility location. EPA will obtain concurrence on its finding from the State Historic Preservation Officer (SHPO), prior to issuance of the final permit, as well as provide notification to all tribes that may have had a historic interest in this particular site/area.

Air Quality Impacts

Figure 1 below indicates the location of the facility along with the tribal boundaries and the closest air monitoring station locations which EPA is using to characterize air quality in the area.

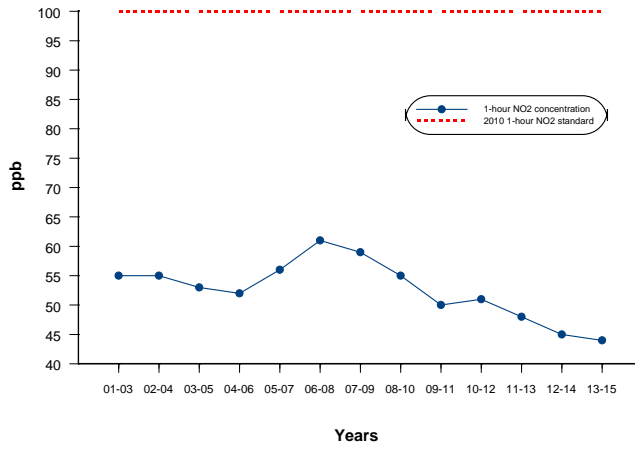


The EPA 1-hour standard for NO₂ is 100ppb. Figure 2 indicates levels much lower than the standard and shows a downward trend in NO₂ emissions.

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Figure 2

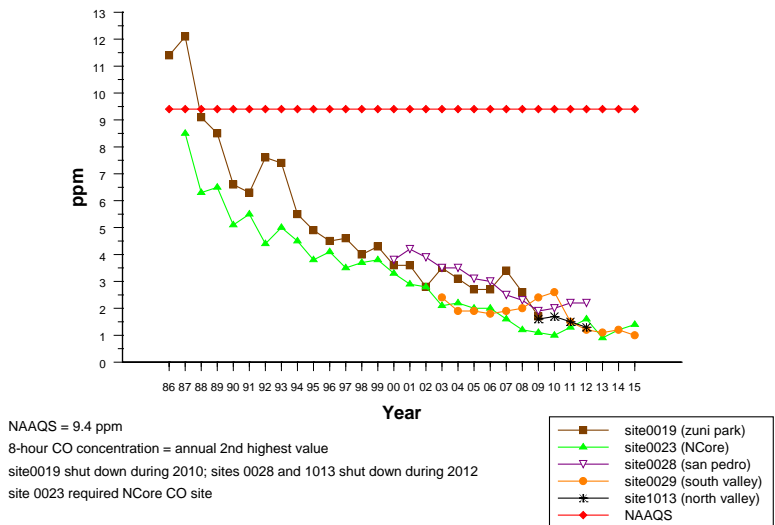
1-hour NO₂ Trends
Albuquerque, New Mexico, Del Norte Site



The CO air monitoring data in the area for which NMGC is obtaining the MNSR permit to limits emissions of this pollutant shows a downward trend below the EPA 8- hour standard of 9 ppm as depicted in Figure 3 below.

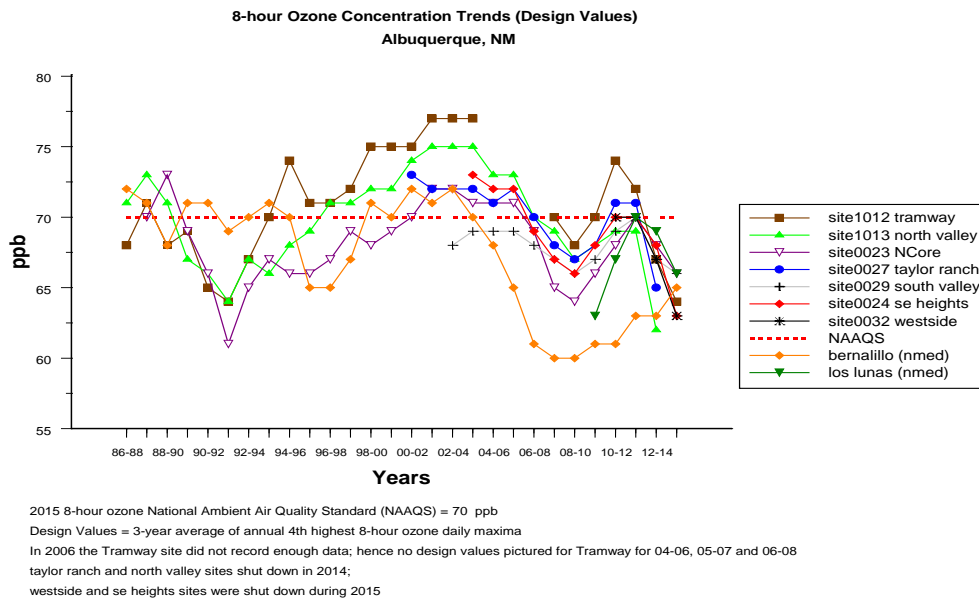
Figure 3

8-hour CO Concentration Trends
Albuquerque, NM



Ozone formation takes place by a chemical reaction of volatile organic compounds (VOC) with NOx in the presence of sunlight. The 2015 EPA ozone NAAQS standard is 70 ppb. Figure 4 shows the downward trend from the nearest air quality monitors located near the facility location.

Figure 4



We are also including wind rose data plots (Figures 5 and 6) documenting the wind direction data at the two air quality monitoring sites nearest to the NMGC facility. (Bernalillo County air monitor and the Los Lunas air monitor). The wind direction data indicates that approximately 50% of the time the wind blows from the north, north east to the southwest. The NMGC facility is southwest of the Bernalillo County air monitor. Based on the wind and monitoring data, we believe there is a low possibility of negative air quality impacts from this facility. The Los Lunas site shows a small percentage of the wind blowing from the south to the northwest direction that may carry air emissions from NMGC towards the Navajo Nation reservation, but we do not expect negative air quality impact from the facility. Since both wind rose data plots show very low winds and low or high percentages of easterly to westerly wind, both the Pueblo of Isleta and Pueblo of Acoma would have a very low possibility of negative air quality impacts from the NMGC Redonda Compressor Station.

Figure 5

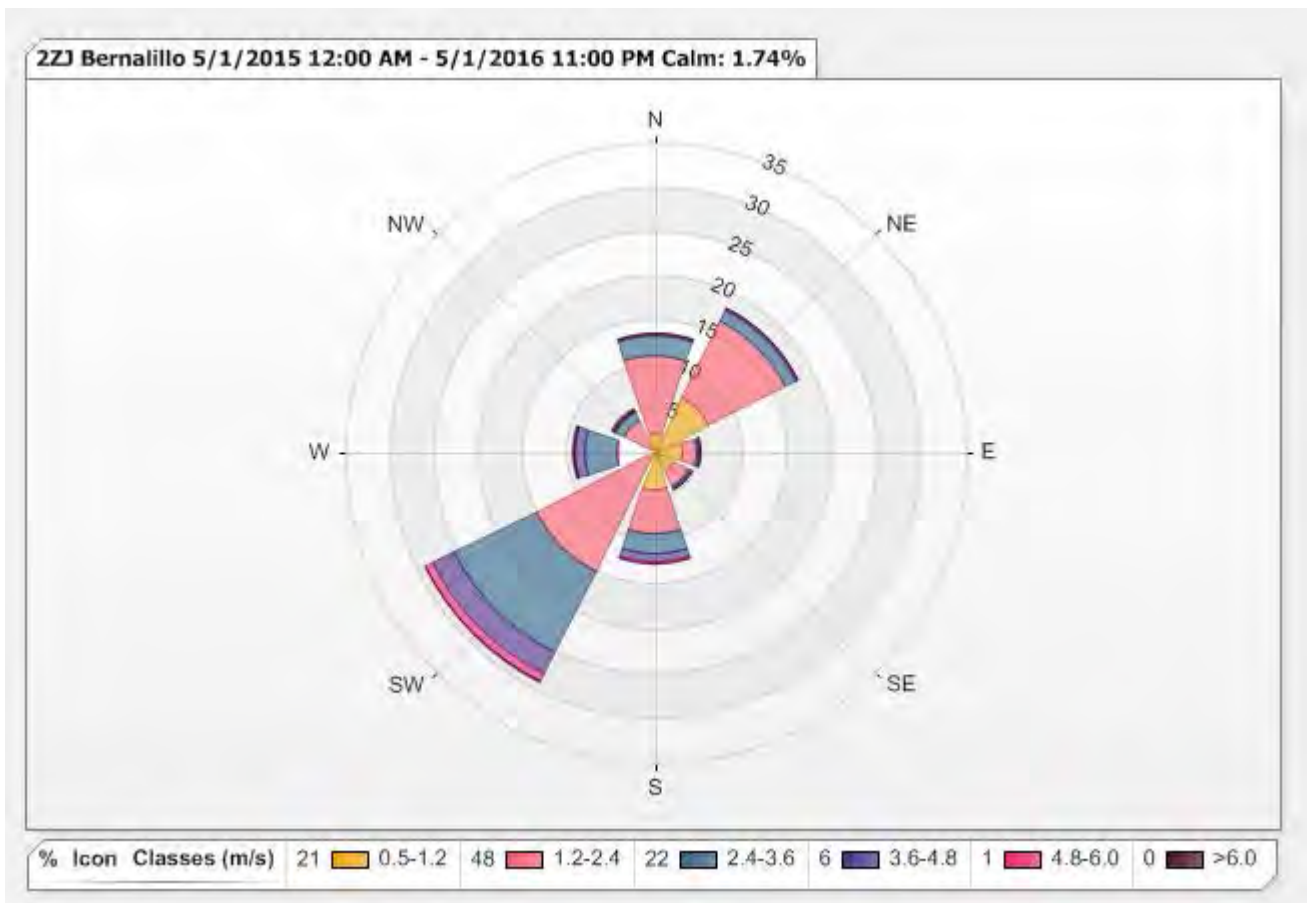
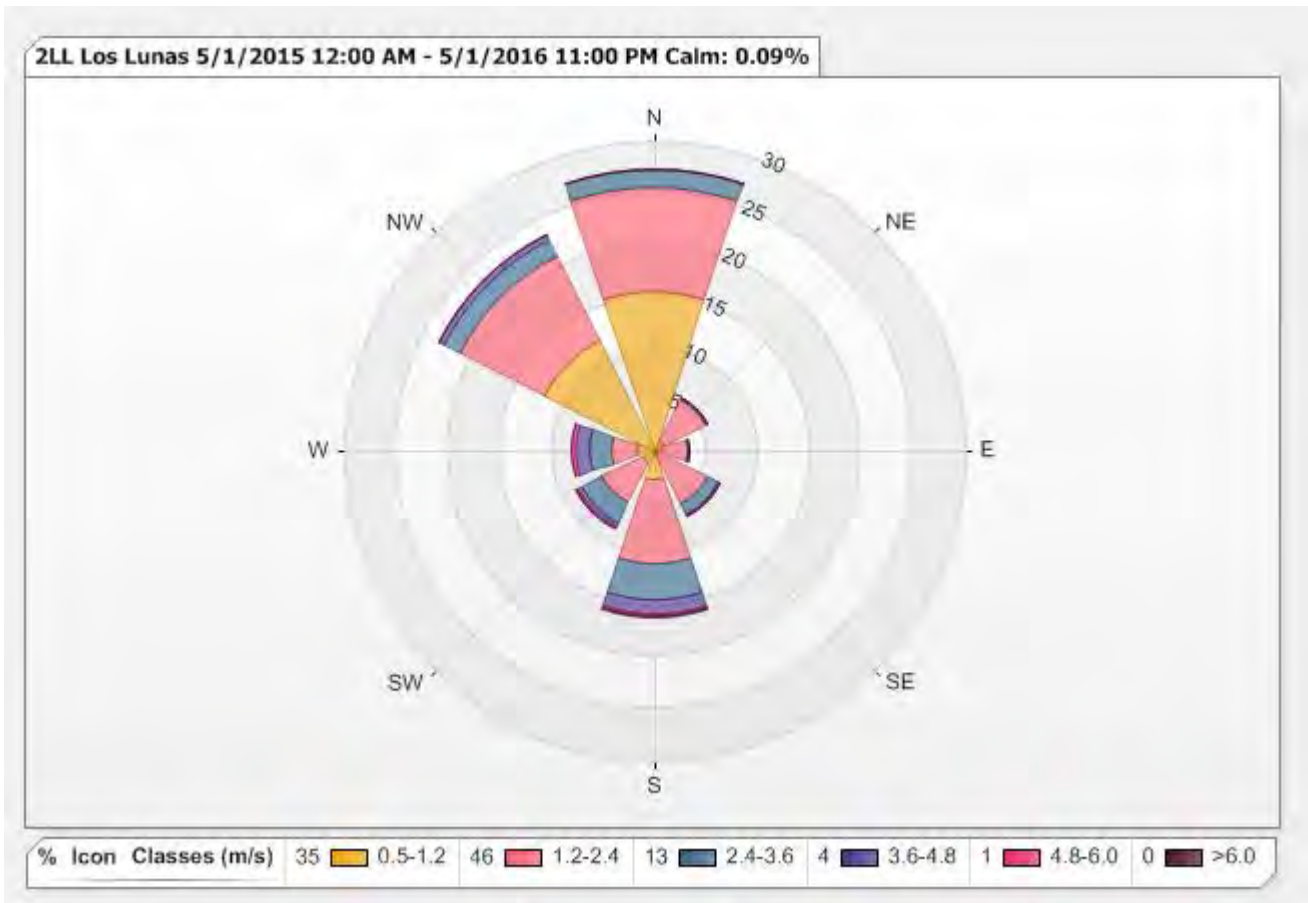


Figure 6





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

MAY 17 2016

Honorable E. Paul Torres
Governor
Pueblo of Isleta
P.O. Box 1270
Isleta, NM 87022

Re: Notification of Consultation and Coordination regarding the EPA Region 6 Issuance of a Synthetic Minor New Source Review Permit for New Mexico Gas Company Redonda Station.

Dear Governor Torres:

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Sincerely



Mark Hansen
Associate Director
Multimedia Division

Enclosures

cc: Ramona Montoya, Environmental Division Manager
poi36871@isletapueblo.com

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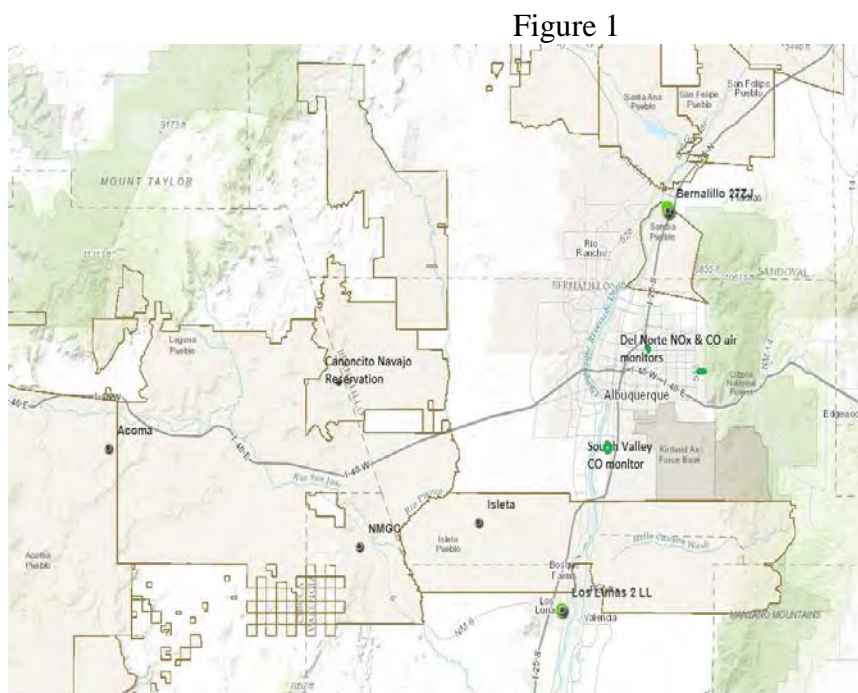
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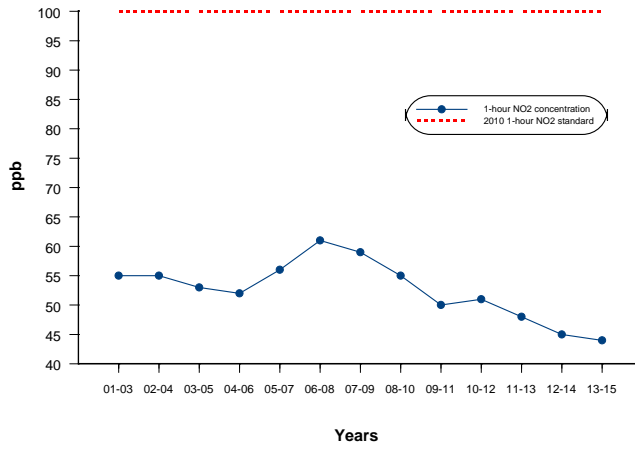


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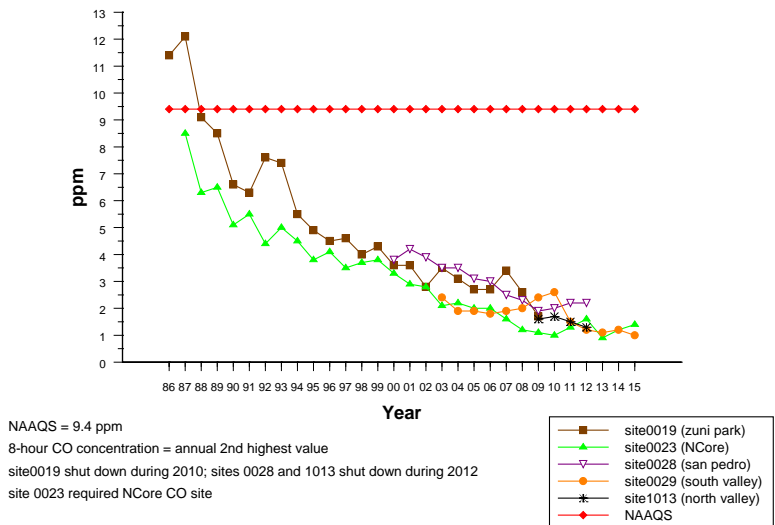
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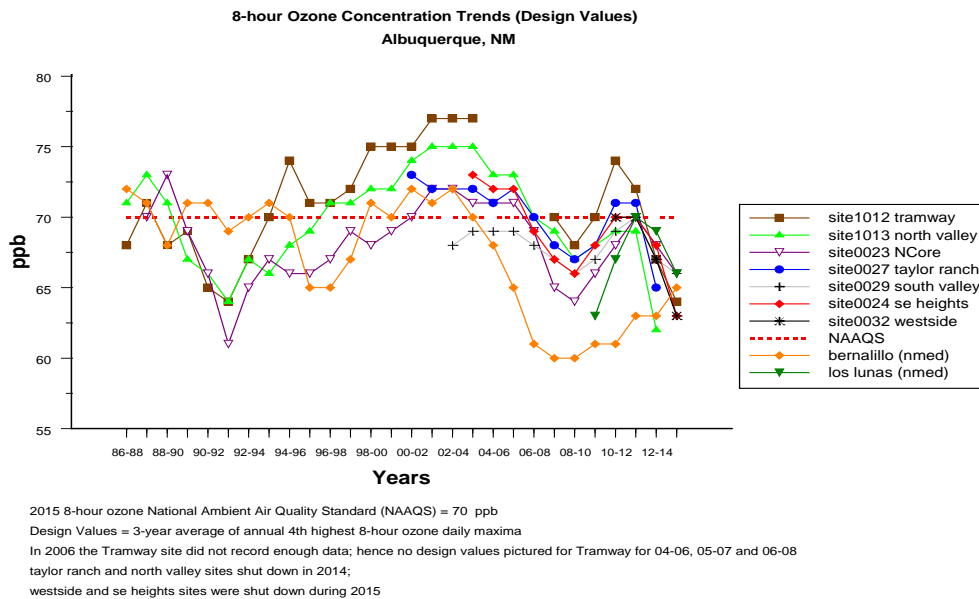
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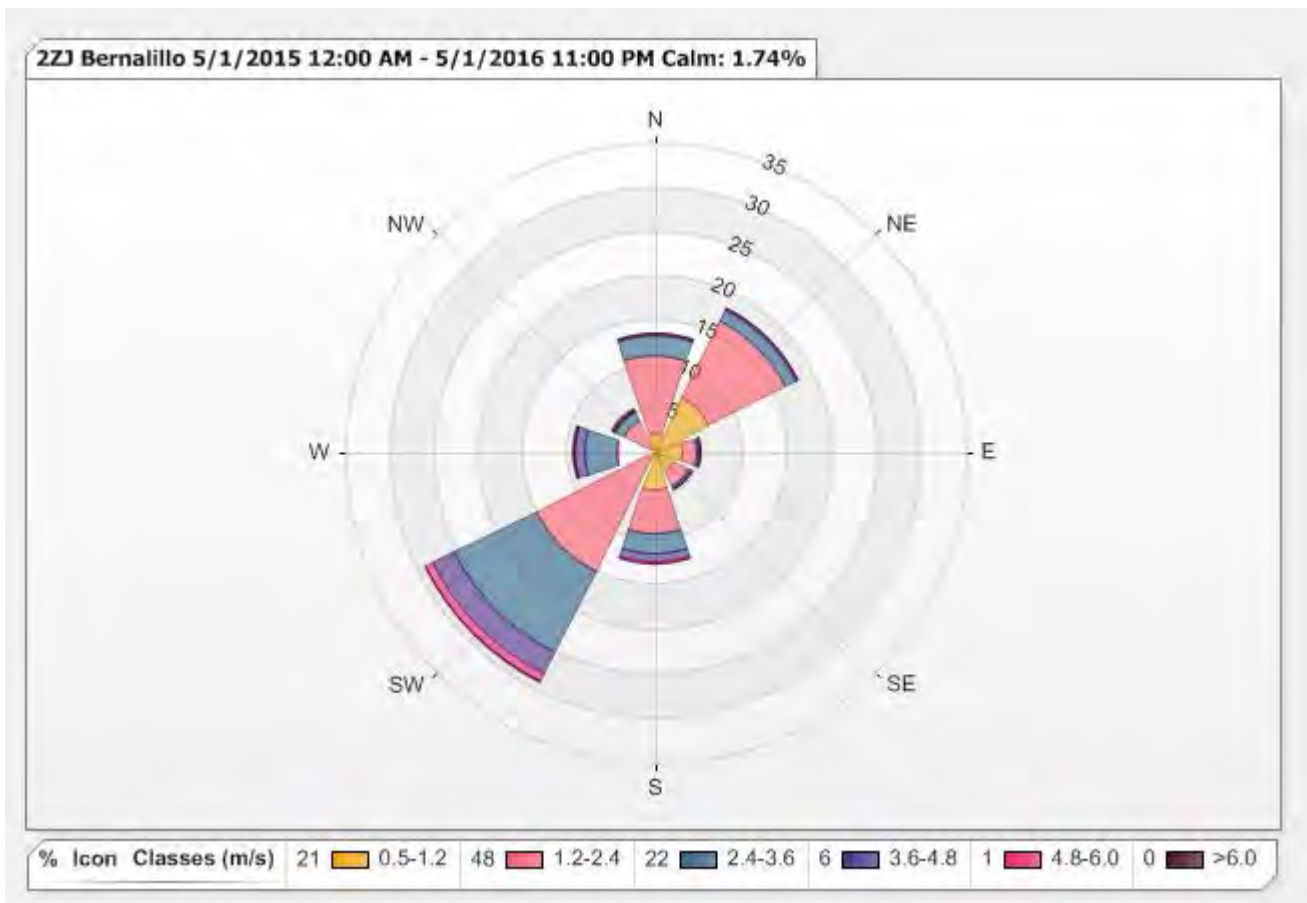
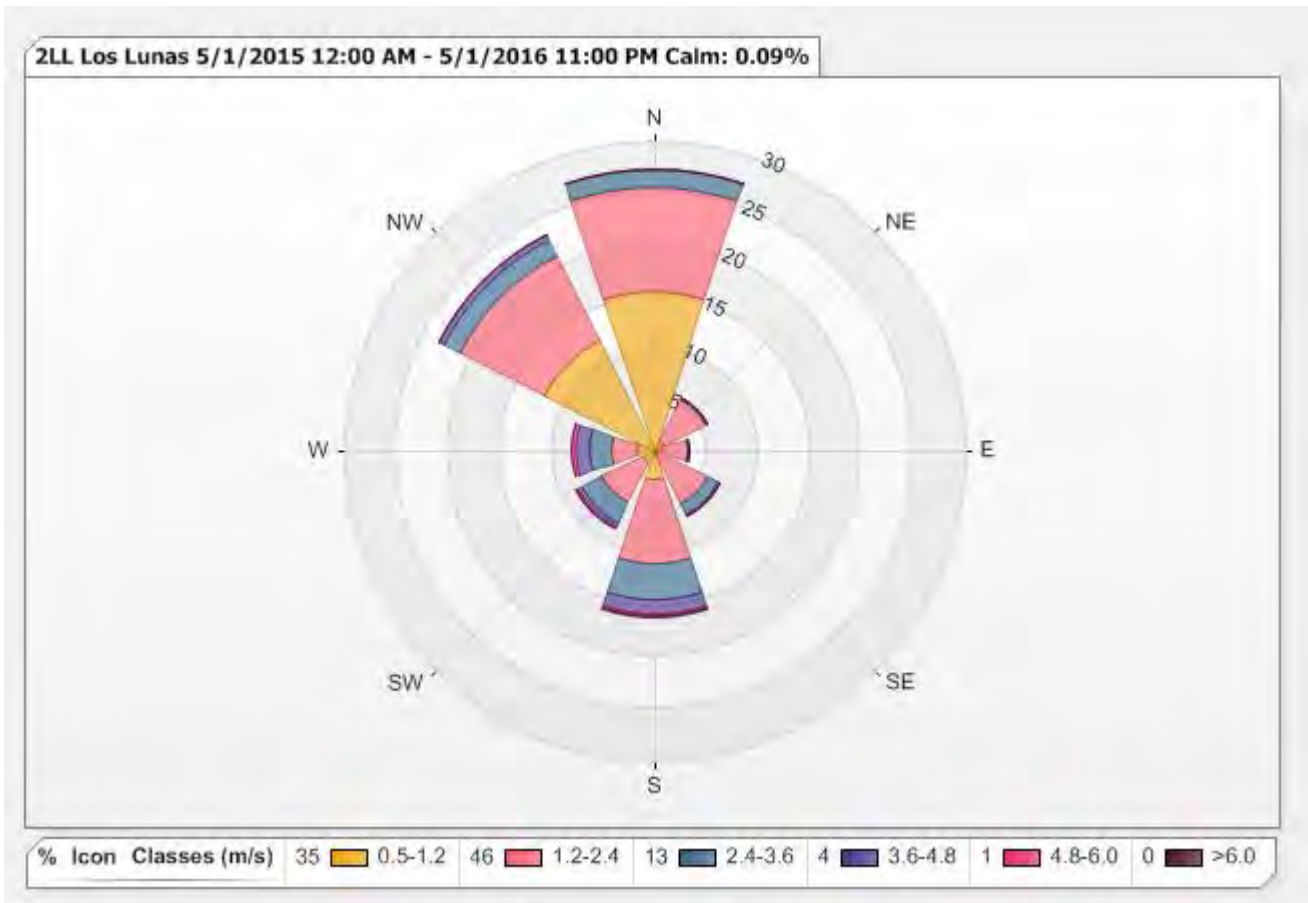


Figure 6





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

MAY 17 2016

Honorable Russell Begaye
President
Navajo Nation
P. O. Box 7440
Window Rock, AZ 86515

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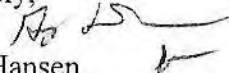
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Enclosures

cc: Dr. Donald Benn, NNEPA

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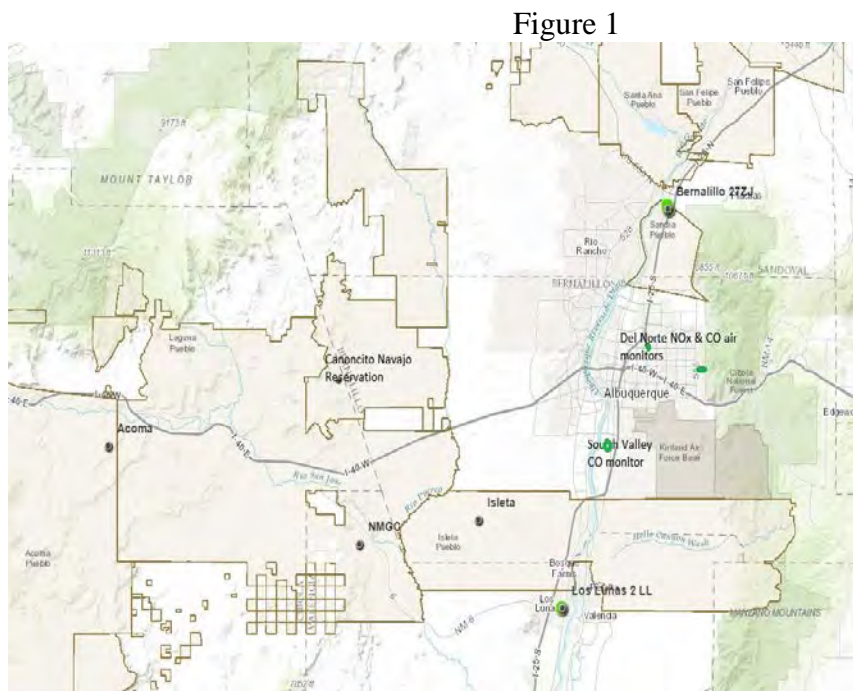
Pursuant to Section 7(a)(2) of the Endangered Species Act (ESA) (16 U.S.C. 1536) and its implementing regulations at 50 CFR Part 402, EPA has concluded that issuance of the proposed synthetic minor NSR permit will have "no effect" on any of the six listed species. The applicant provided documentation as part of the permit application indicating that for the six listed species in the county there are no known occurrences, no designated critical habitat, and no suitable habitat. Additionally there is no increase in emissions and the permit does not allow any new construction activities that may otherwise effect the listed species.

National Historic Preservation Act Regulatory (NHPA) Requirements

Pursuant to 36 CFR § 800.3(a)(1) of NHPA, EPA has determined that the proposed action does not have the potential to cause effects on historic properties, assuming that such properties were present because the permit does not authorize any new construction or ground disturbances, nor has the applicant proposed such activities. An archaeological survey was conducted at the time of construction of the facility in 1990. The survey¹ report indicated a “lack of significant intact cultural resources” were present at the facility location. EPA will obtain concurrence on its finding from the State Historic Preservation Officer (SHPO), prior to issuance of the final permit, as well as provide notification to all tribes that may have had a historic interest in this particular site/area.

Air Quality Impacts

Figure 1 below indicates the location of the facility along with the tribal boundaries and the closest air monitoring station locations which EPA is using to characterize air quality in the area.

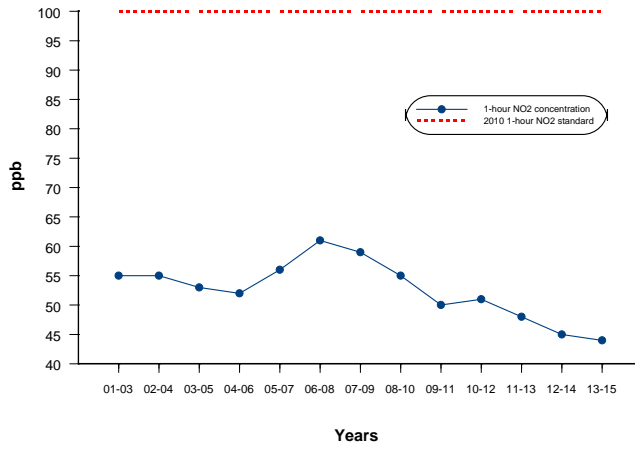


The EPA 1-hour standard for NO₂ is 100ppb. Figure 2 indicates levels much lower than the standard and shows a downward trend in NO₂ emissions.

¹ This report is available at: <http://www.epa.gov/caa-permitting/tribal-nsr-permits-epas-south-central-region-laguna-pueblo-redonda-compressor-station>

Figure 2

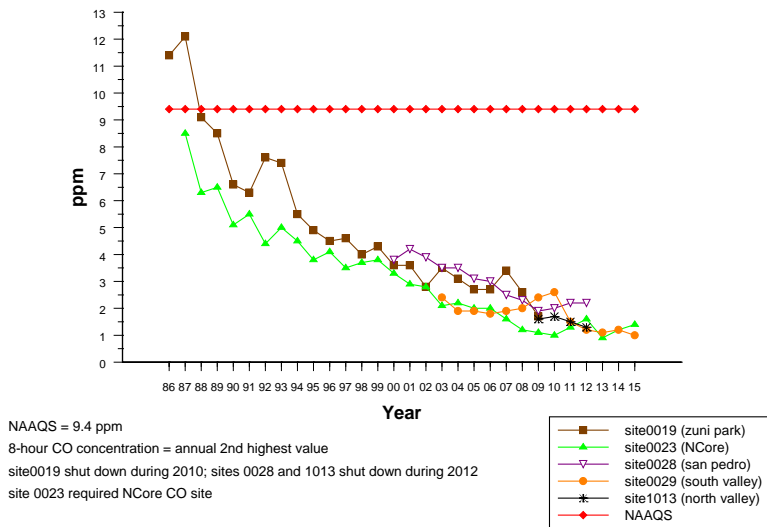
1-hour NO₂ Trends
Albuquerque, New Mexico, Del Norte Site



The CO air monitoring data in the area for which NMGC is obtaining the MNSR permit to limits emissions of this pollutant shows a downward trend below the EPA 8- hour standard of 9 ppm as depicted in Figure 3 below.

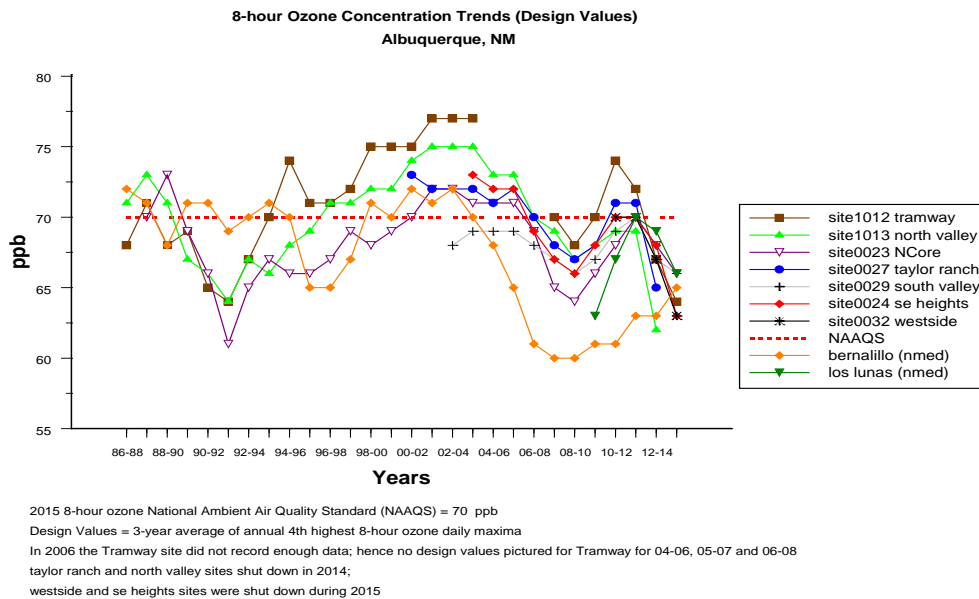
Figure 3

8-hour CO Concentration Trends
Albuquerque, NM



Ozone formation takes place by a chemical reaction of volatile organic compounds (VOC) with NOx in the presence of sunlight. The 2015 EPA ozone NAAQS standard is 70 ppb. Figure 4 shows the downward trend from the nearest air quality monitors located near the facility location.

Figure 4



We are also including wind rose data plots (Figures 5 and 6) documenting the wind direction data at the two air quality monitoring sites nearest to the NMGC facility. (Bernalillo County air monitor and the Los Lunas air monitor). The wind direction data indicates that approximately 50% of the time the wind blows from the north, north east to the southwest. The NMGC facility is southwest of the Bernalillo County air monitor. Based on the wind and monitoring data, we believe there is a low possibility of negative air quality impacts from this facility. The Los Lunas site shows a small percentage of the wind blowing from the south to the northwest direction that may carry air emissions from NMGC towards the Navajo Nation reservation, but we do not expect negative air quality impact from the facility. Since both wind rose data plots show very low winds and low or high percentages of easterly to westerly wind, both the Pueblo of Isleta and Pueblo of Acoma would have a very low possibility of negative air quality impacts from the NMGC Redonda Compressor Station.

Figure 5

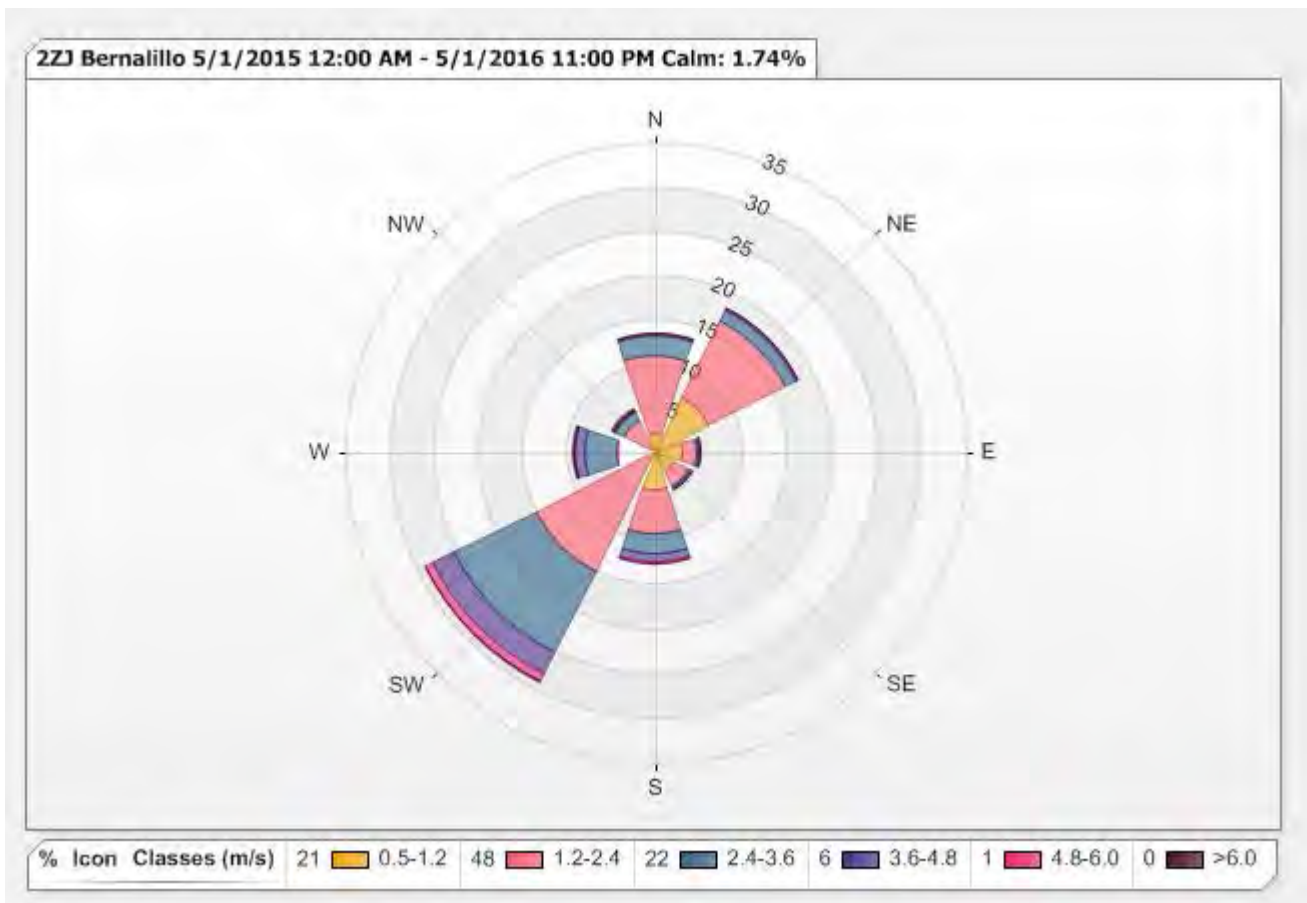
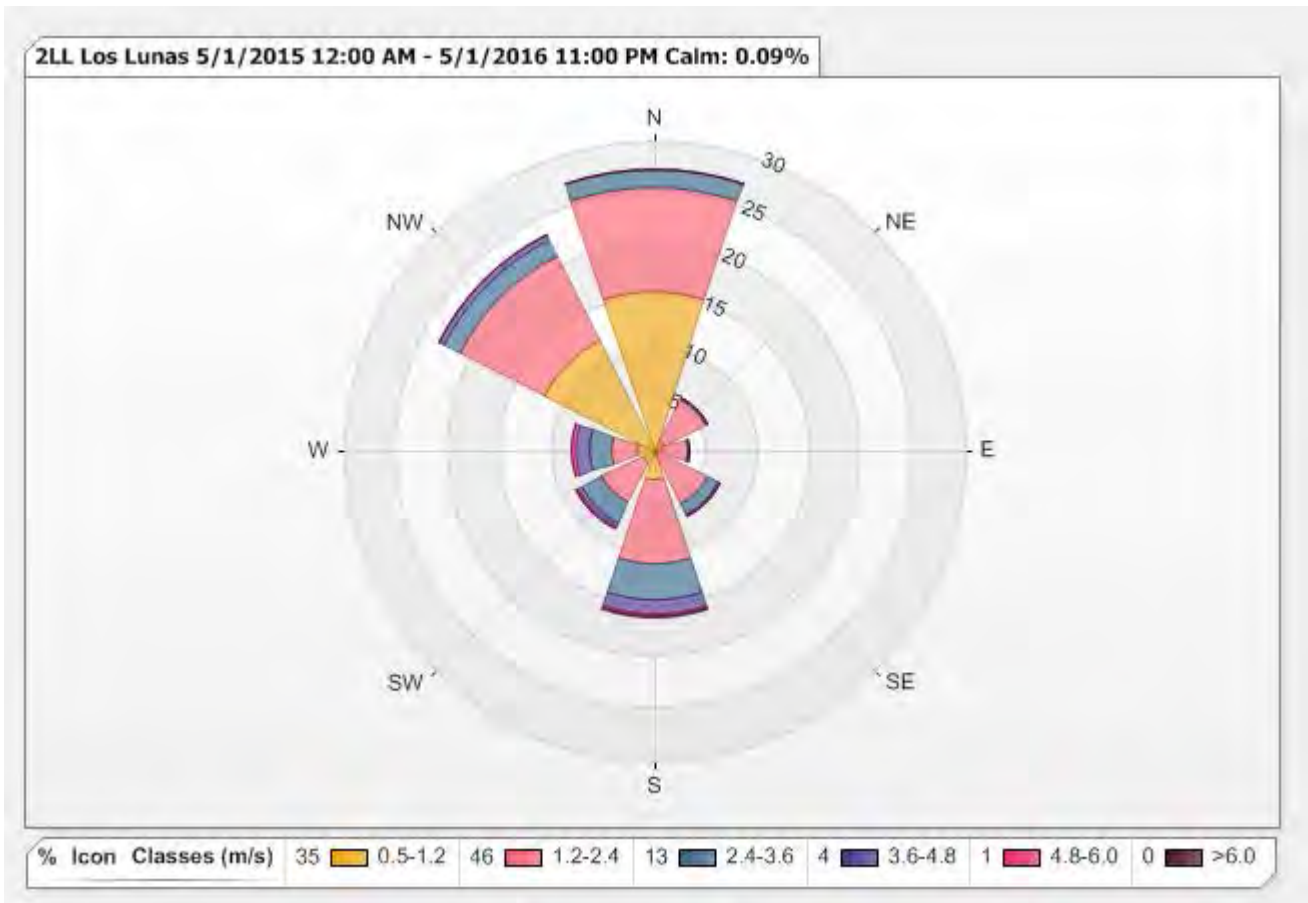


Figure 6



ENCLOSURE

Tribal Consultation and Coordination Process and Timeline For New Mexico Gas Company Synthetic Minor Permit Issuance

Date	Event	Contact Information
May 17, 2016	Consultation Letter Invite to Adjacent Tribal Nations	Jeff Robinson Air Permits Section Chief 214-665-7250
Tribal Response June 17, 2016	Yes or No for consultation	
*End July 15, 2016	If consultation request is received and is ongoing, this date will be extended so long as the tribal consultation is initiated prior to this date.	Or Bonnie Braganza EPA Region 6 1445 Ross Ave Dallas TX 75202 Braganza.bonnie@epa.gov 214-665-7340
*August 3, 2016	Public Notice of draft permit and 30 day public comment period. Opportunity for only submitting written public comments to EPA, or request for a public hearing based on specific conditions.	
* September 2, 2016	End of public comment period.	
*September 14, 2016	Synthetic Minor Permit issued	

* These dates are subject to change should we receive request for consultation and/or public comments are received during the 30 day public comment period.

EXECUTIVE SUMMARY

New Mexico Gas Company (NMGC)

CURRENT OPERATIONS:

NMGC operates the Redonda Compressor Station (Redonda) located on the Pueblo of Laguna in Valencia County, New Mexico. NMGC acquired the Redonda Compressor Station in early 2009 as a part of the acquisition of all assets belonging to the Public Service Company of New Mexico (PNM) business. This is an existing facility and there have been no major changes in the operation of the facility since NMGC acquired Redonda, except for the installation of an emergency generator for safety reasons. Redonda's primary compressor engines only operate when additional compression is needed to handle specific quantities of gas within the pipeline. The compression station is an unmanned facility and NMGC is a local utility distribution company that provides natural gas service to 19 tribal nations in New Mexico.

An emergency generator fueled by natural gas or propane was added in 2013 to provide emergency power to the instrumentation and lighting during power outages at the remote location.

The majority of emissions from the facility are from combustion of natural gas in two compressor engines with some minimal VOC emissions (<0.6 tpy) from tanks (storing pipeline liquids, ethylene glycol, used oil and wastewater) associated filters and separators at the facility.

LOCATION:

The Redonda compressor station is at: 34.8924 Latitude and -107.10662 Longitude outside of Rio Purco, New Mexico, at an elevation of approximately 5390 ft.



SUMMARY OF EPA FEDERAL ACTION

Upon receipt of the NMGC permit application and additional information received by EPA from the company, we are currently processing a draft synthetic minor NSR permit for NMGC. This permitting action will allow NMGC to continue operations and have practically enforceable monitoring and recordkeeping provisions to minimize CO and NO_x emissions that will remain below major source thresholds.

Since this is an existing operation, the permit will restrict any additional emissions from this operation and shall require the use of a control device to reduce of oxides of nitrogen (NO_x) and carbon monoxide (CO) emissions from one of the compressors to maintain the emissions below major emission source thresholds.

NSR REGULATORY REQUIREMENTS:

NMGC has complied with the regulatory requirement requesting a synthetic minor new source review permit application (40 CFR § 49.158) and with the source registration requirements of 40 CFR § 49.160.

The EPA has determined that the emissions from the continued operation of the existing facility will not require a detailed air quality impacts evaluation (40 CFR § 49.158(d)), since the facility has not modified its operation, and because Valencia County is currently in attainment with the national ambient air quality standards (NAAQS) for all pollutants based on monitoring data of NO₂ and Ozone at the nearest NMED monitoring stations. In addition, the current air quality monitoring data indicates that monitored NAAQS concentrations have decreased over the recent years. See the air quality impacts discussion below for more information.

EPA will draft the permit to meet all the requirements in 40 CFR § 49.151 - 49.159. The permitting action for this facility will specify any necessary monitoring and recordkeeping provisions for NMGC's current operations with no additional authorizations of new emissions or construction. The facility uses a catalyst on one compressor engine to reduce the NO_x and CO emissions below the major source emission thresholds and the permit will require compliance with the operation of the compressor engine with the catalyst at all times.

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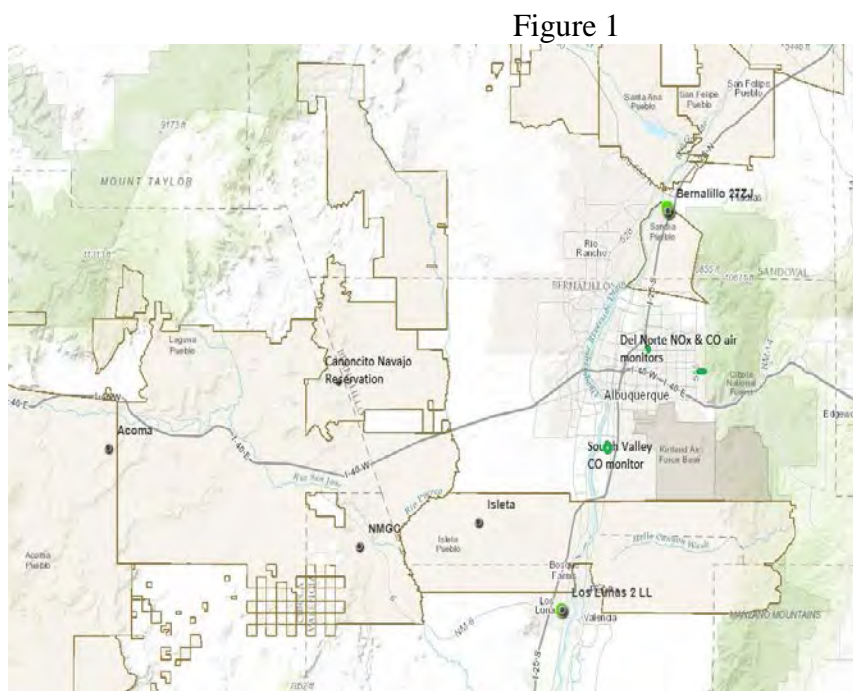
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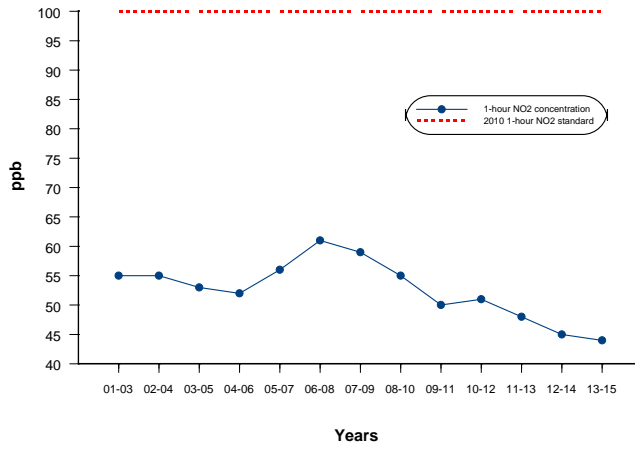


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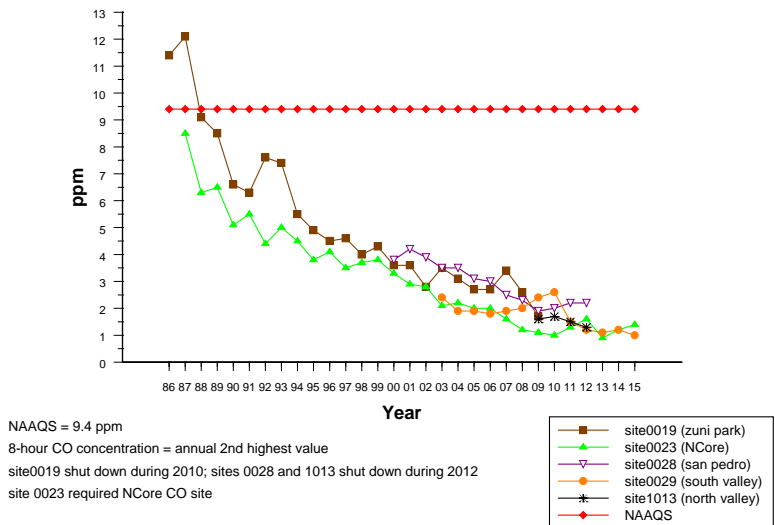
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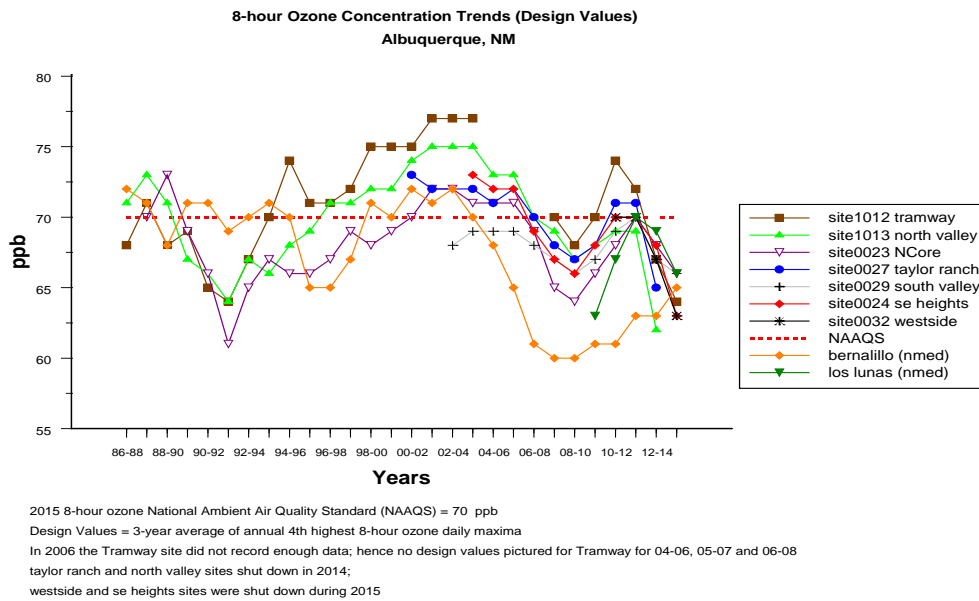
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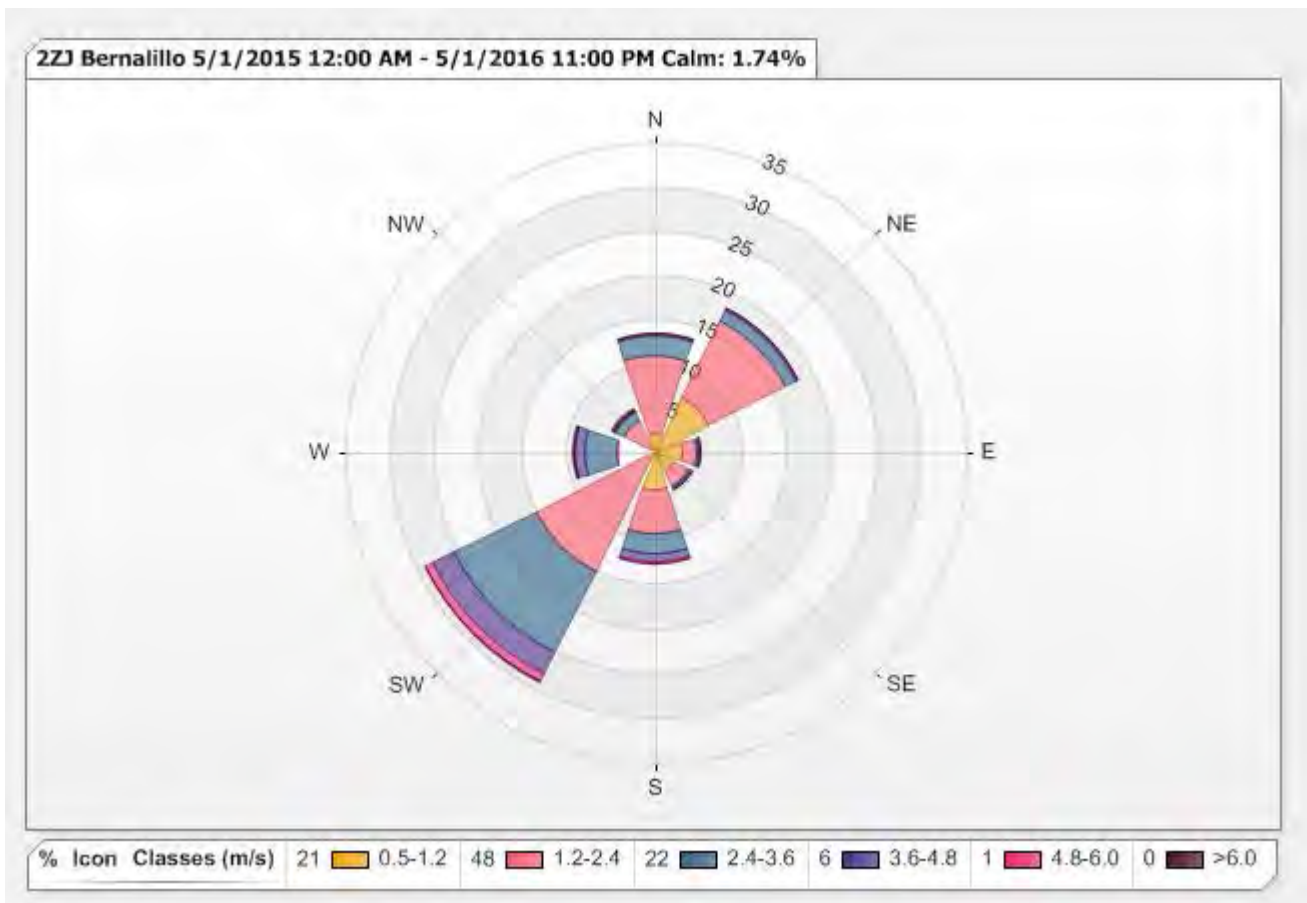


Figure 6

