STATEMENT OF BASIS

To: Reviewers

Through: Lori Bocchino, Operating Permit Program Manager

From: Rita Piroutek, Air Quality Engineer

Subject: Draft Operating Permit 3-2-040-3, Tallgrass MLP Operations, LLC, Casper Gas Plant and Compressor Station

Date: January 6, 2015

Introduction:

Attached is the draft modification of Wyoming Air Quality Standards and Regulations (WAQSR) Ch 6, Sec 3 operating permit 3-2-040-3 for the Casper Gas Plant and Compressor Station. Permit 3-2-040-2 was issued February 26, 2013. The operating permit is being modified to incorporate applicable requirements from the following permit actions:

Waiver wv-14388 (7/9/2013): was issued for the replacement of the existing depropanizer system with a new system and conversion of the existing depropanizer system into a debutanizer system, as well as additional modifications. This waiver requires compliance with applicable requirements of 40 CFR 60, Subpart OOOO and 40 CFR 63, Subpart HH.

Waiver wv-16133 (4/22/2014): authorized the installation of one (1) 60,000 gallon pressurized aboveground propane storage tank (Tank 11) and tank reconfiguration. This waiver requires compliance with applicable requirements of 40 CFR 60, Subpart OOOO.

Division letter dated 9/5/2014: acknowledged the addition of two (2) 6" tie-in valves and five flanges for a proposed bidirectional line. There are no applicable requirements from this letter.

Permit MD-16181 (9/24/2014): was issued to modify the frequency of monitoring for benzene/BTEX emissions from the EG Dehydration Unit. This permit supersedes permit MD-769. Applicable requirements for the dehydration unit include the benzene limit, calculation of the annual BTEX limit according to 40 CFR 63, Subpart HH, the requirement to calculate benzene and total BTEX emission rates monthly, and compliance with any applicable requirements of 40 CFR 63, Subpart HH.

The permit revisions include the following:

- The Table of Contents was updated to include 40 CFR 60, Subpart OOOO and repagination.
- The latitude coordinates of the facility are updated in the General Information section, and the Responsible Official was removed, as the Division no longer includes these in operating permits.
- Tank 11 is added to the Source Emission Points Table. Additionally, the permit reference for source F015C-D1 is updated.

- Condition F5 is revised to specify the actual annual average benzene emission limit. The BTEX emission limit required by 40 CFR 63, Subpart HH was added, and the header was revised to reflect both limits.
- Condition F12 was revised to update the website address for the portable analyzer monitoring protocol.
- Condition F13 now details the revised benzene and total BTEX emission calculation and monitoring requirements from permit MD-16181 for the EG dehydration unit.
- Condition F16 (g) and (h) is updated to reflect recordkeeping requirements associated with the revised monitoring.
- Reporting requirements for the Natco EG dehydration unit are revised in condition F20.
- 40 CFR 60 Subpart, OOOO was added.
- Permit and waiver references are updated for 40 CFR 63, Subpart HH.
- Compliance certification is updated to reflect the changes to the permit.
- The State Only Permit Conditions are updated to include the current requirements.
- The Summary Table for the dehydration unit F015C-D1 is updated to reflect the changes to the permit.
- The Abbreviations section is updated to reflect the list used in permits currently issued by the Division.