

STATEMENT OF BASIS

To: Reviewers

Through: Lori Bocchino, Operating Permit Program Manager

From: Despina Nikolova, Air Quality Engineer

Subject: Draft Operating Permit 3-1-220, WGR Asset Holding Company, LLC
Cinderella Compressor Station

Date: April 22, 2013 (*Amended June 4, 2013*)

Introduction:

Attached is the draft Wyoming Air Quality Standards and Regulations (WAQSR) Ch 6, Sec 3 operating permit for WGR Asset Holding Company LLC, Cinderella Compressor Station. The gas produced from coal bed methane is brought into the station, then compressed and sent to the pipeline for further processing. Emission sources at the facility include six 915 hp Caterpillar G3512 LE (E1-E3, E8, E10-E11) and four 1105 hp Caterpillar G3516 LE (E4-E7) compressor engines equipped with oxidation catalysts. This facility is currently identified as an area source of HAP emissions.

Permitting History:

CT-3769 (12/21/04): allowed for construction of the Cinderella Compressor Station consisting of a combination of up to six engines. No engines were constructed under this permit.

CT-3769A (3/31/05): modified CT-3769 to relocate the facility from the NE¼, to the SW¼, of Section 15. Two Caterpillar G3512LE engines (E1 and E2) were constructed under this permit.

MD-1264 (11/15/05): revised the engine configuration to allow 13 total engines (E1-E13). One Caterpillar G3512LE (E3) and four Caterpillar G3516LE engines (E4-E7) were constructed under this permit.

MD-1264A (3/28/07): modified permit MD-1264 by authorizing construction of four Caterpillar G3512LE engines in place of four other engines that had been permitted but not yet constructed. This permit supersedes all previous permits. Three Caterpillar G3512LE engines (E8, E10, and E11) were constructed under this permit. However, authorization to construct the remaining engines (E9, E12, and E13) is no longer valid. Applicable requirements for all new and existing engines include NO_x, CO, and formaldehyde emission limits; annual emission testing; and catalyst monitoring consisting of measuring the inlet catalyst temperature and pressure drop across the catalyst.

Division Letter (7/14/11): authorized the use of an alternative formaldehyde emissions test option for engines currently permitted to utilize a portable analyzer to measure NO_x and CO emissions and not subject to 40 CFR 60, Subpart JJJJ – *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines* or the major source requirement for 40 CFR 63, Subpart ZZZZ - *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*.

Applicable Requirements:

In addition to the permit requirements listed above, the sources at the facility are subject to visible emission limits in accordance with WAQSR Ch 3, Sec 2.

Per 40 CFR 63, Subpart ZZZZ, *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, all reciprocating internal combustion engines, including all ten compressor engines at the facility, are subject to the requirements of 40 CFR 63 Subpart ZZZZ at an area source.

As applicable, the permittee shall meet all requirements of 40 CFR 60, Subpart JJJJ – *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines*. As of March 27, 2013, the compressor engines are not subject to Subpart JJJJ according to information submitted to the Division by the permittee.

Periodic Monitoring

For periodic monitoring of visible emissions from the engines, the permittee will monitor the type of fuel burned to ensure natural gas is the sole fuel source. Annual monitoring for NO_x, CO, and formaldehyde emissions is required for all the engines (E1-E8, E10-E11).

All ten Caterpillar reciprocating internal combustion engines have potential pre-control emissions of NO_x, CO and formaldehyde less than major source thresholds. Therefore, they are not subject to the WAQSR Ch 7, Sec 3, Compliance Assurance Monitoring (CAM) requirements.

Addendum (Amended June 4, 2013)

The facility may have applicable requirements under 40 CFR 60, Subpart OOOO, or may become subject to the standard during the term of the permit. The subpart is added to the NSPS list and condition C1.