

## STATEMENT OF BASIS

To: Reviewers  
Through: Lori Bocchino, Operating Permit Program Manager  
From: Hillary Killorn, P.E., Operating Permit Engineer  
Subject: Draft Chapter 6, Section 3 Operating Permit 3-2-157-2, Burlington Resources, Incorporated, Lost Cabin Gas Plant  
Date: November 24, 2013 *Addendum February 28, 2014*

Attached for your review is the draft modified Wyoming Air Quality Standards and Regulations (WAQSR) Chapter 6, Section 3 operating permit 3-2-157-2 for the Burlington Resources, Incorporated, Lost Cabin Gas Plant. The operating permit is being modified to recognize new WAQSR Chapter 6, Section 2 waivers that have been issued and update applicable requirements that have changed since the issuance of permit 3-2-157-1 on July 16, 2013.

On March 28, 2012, the Air Quality Division updated the WAQSR Chapter 14, Section 3 for the Sulfur Dioxide Milestone Inventory, to revise measurement techniques and baseline date language. The Lost Cabin Gas Plant is subject to these requirements.

WAQSR Chapter 6, Section 3(d)(vii) requires the Division of Air Quality to reopen the operating permit if additional requirements under the Act become applicable to a major source with a remaining permit term of 3 or more years. On October 23, 2013, Burlington Resources, Incorporated was notified that the Division intended to reopen operating permit 3-2-157-1 to update the applicable requirements from WAQSR Chapter 14, Section 3 and incorporate any new requirements from the WAQSR Chapter 6, Section 2 waivers.

Temporary Waiver wv-14663 (4/18/13): permitted flaring of sour gas, with estimated emissions of 170 tons of sulfur dioxide (SO<sub>2</sub>), for the annual maintenance turnaround of Train 3 from April 23 through May 16, 2013. There are no remaining requirements.

Temporary Waiver wv-15272 (8/2/13): permitted flaring of sour gas, with estimated emissions of 106 tons of sulfur dioxide (SO<sub>2</sub>), for the annual maintenance turnaround of Trains 1 and 2 from August 4 through September 2, 2013. This waiver expired on September 30, 2013.

The operating permit revisions include the following:

- Condition F23: revised to reflect current WAQSR Chapter 14, Section 3 baseline date requirements.

### *Addendum February 28, 2014*

*While the proposed permit was under EPA review, the Division was notified of a responsible official change and the addition of an alternate. These updates have been made in the general information section on page 3 of the permit. Additionally, condition F5(a) is updated to reflect recent changes to visible emission limits in WAQSR Chapter 3, Section 2 for diesel-fired engines. Condition S1 is updated to include wording used in permits currently issued by the Division. These changes are administrative in nature and do not warrant an additional public notice period.*