

STATEMENT OF BASIS

To: Reviewers
Through: Lori Bocchino, Operating Permit Program Manager
From: Brian Fehr, Air Quality Engineer
Subject: Draft Chapter 6, Section 3 Operating Permit 3-2-012-2, Chevron USA, Inc., Carter Creek Gas Plant

Date: November 25, 2013 *Addendum March 4, 2014*

Attached for your review is the draft modified Wyoming Air Quality Standards and Regulations (WAQSR) Chapter 6, Section 3 operating permit 3-2-012-2 for the Chevron USA, Inc., Carter Creek Gas Plant. The operating permit is being modified to update applicable requirements that have changed since the issuance of permit 3-2-012-1 on August 5, 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 Carter Creek Gas Plant is subject to these requirements.

Chapter 6, Section 3(d)(vii) of Wyoming Air Quality Standards and Regulations (WAQSR) requires the Division of Air Quality to reopen the operating permit if additional requirements under the Act become applicable to a source with a remaining permit term of 3 or more years. On October 18, 2013, Chevron USA, Inc. was notified that the Division intended to reopen operating permit 3-2-012-1 to revise applicable requirements from WAQSR Chapter 14, Section 3.

It should be noted that a temporary WAQSR Chapter 6, Section 2 waiver, wv-15021, was issued on June 7, 2013, while the previous modification was on notice. This waiver authorized temporary routing of the sulfur pit to the atmosphere allowing for internal inspection of the caustic scrubber. All applicable requirements from this waiver are fulfilled and the waiver expired on July 31, 2013. There are no applicable requirements from wv-15021 to include in this operating permit modification.

The operating permit revisions include the following:

- Condition F18: revised to reflect current WAQSR Chapter 14, Section 3 baseline date requirements.
- Appendices A and B are corrected to include the 2010 versions of the operating plan and CAM plan which were included in the 3-2-012 permit. The 2007 versions of these plans were erroneously included in the 3-2-012-1 permit.

Addendum March 4, 2014

Condition S1 is updated to include wording used in permits currently issued by the Division. This change is administrative in nature and does not warrant an additional public notice period.