

STATEMENT OF BASIS

To: Reviewers

Through: Lori Bocchino, Operating Permit Program Manager

From: Melissa Meares, Air Quality Engineer

Subject: Draft Operating Permit 3-3-044, Colorado Interstate Gas Company LLC,
Elk Basin Compressor Station

Date: January 24, 2012

Attached is the draft Wyoming Air Quality Standards and Regulations (WAQSR) Chapter 6, Section 3 renewal operating permit for Colorado Interstate Gas Company LLC (CIG), Elk Basin Compressor Station. The Elk Basin facility gathers and compresses natural gas produced from nearby well sites for transmission. Emissions sources include two, 2,800 hp Dresser-Clark compressor engines (units CG-11 and CG-12) and one 375 hp Caterpillar G3408C LE generator engine (unit G1). The Dresser-Clark engines were previously reported as 2,500 hp engines; the error was discovered during the technical review of this operating permit.

Permitting History:

This facility was constructed in 1972, pre-dating WAQSR Ch 6, Sec 2 permitting requirements.

Waiver AP-3072 (3/11/05): was issued for the installation of a gas driven starting system on units CG-11 and CG-12. The waiver contained no applicable requirements.

Waiver AP-9572 (7/15/09): allowed for the installation of one 375 hp Caterpillar G3408C LE generator engine. Applicable requirements for unit G1 include NO_x, CO, and VOC emission limits; 500 operating hours limit; NO_x, CO, and VOC emissions testing every three years; as well as notification and retesting if the engine tests outside the permitted limits

Applicable Requirements:

In addition to the aforementioned requirements, applicable requirements include the WAQSR Ch 3, Sec 2 visible emission limits for all units.

This facility is a major source of HAP emissions and subject to the requirements of 40 CFR 63, Subpart ZZZZ for Reciprocating Internal Combustion Engines (RICE). Affected sources under this subpart are any existing, new or reconstructed stationary RICE, including units CG-11, CG-12, and G1. Units CG-11 and CG-12 are existing spark ignition 2 stroke lean burn stationary RICE with a site rating of more than 500 hp and have no applicable requirements under Subpart ZZZZ. New emergency units at a major source, including unit G1, must meet the requirements of §63.6640(f) and comply with the applicable requirements of 40 CFR 60, Subpart JJJJ. However, unit G1 has no applicable requirements from Subpart JJJJ because of its date of manufacture.

Periodic Monitoring:

Periodic monitoring for visible emissions from each engine consists of monitoring the type of fuel used to ensure natural gas is the sole fuel source for these units. Emissions monitoring for unit G1 consists of NO_x, CO and VOC testing every three years. Operating hours from unit G1 shall also be monitored and recorded.