

## STATEMENT OF BASIS

To: Reviewers  
Through: Lori Bocchino, Operating Permit Program Manager  
From: Despina Nikolova, Air Quality Engineer  
Subject: Draft Chapter 6, Section 3 Operating Permit 3-1-201-1, Enterprise Jonah Gas Gathering Company LLC, Bird Canyon Compressor Station  
Date: September 3, 2014

Attached for your review is the draft modification of Wyoming Air Quality Standards and Regulations (WAQSR) Ch 6, Sec 3 operating permit 3-1-201-1 for Enterprise Jonah Gas Gathering Company LLC, Bird Canyon Compressor Station. Permit 3-1-201 was issued September 3, 2010 and is being modified to incorporate new requirements which have since become applicable to the facility.

In 2012, the Environmental Protection Agency promulgated revised National Emission Standards for Hazardous Air Pollutants (NESHAPs) for several source categories, including Subpart DDDDD for *Industrial, Commercial, and Institutional Boilers and Process Heaters*.

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 29, 2012, Enterprise Jonah Gas Gathering Company LLC was notified that the Division intended to reopen operating permit 3-1-201 to add applicable requirements from 40 CFR 63, Subpart DDDDD.

The permit is also being modified to incorporate the applicable requirements of WAQSR Ch 6, Sec 2 permits issued after operating permit 3-1-201 was issued, as follows:

Permit MD-11560 (12/9/11): was issued for replacement of three 400 bbl condensate storage tanks with three 1,000 bbl horizontal pressurized condensate storage tanks (T1-T3), authorizing pigging activities, revising the line heater (H1) capacity to 1.584 MMBtu/hr, installing two pressurized liquids flash vessels (T4 and T5), and updating facility emissions. Permit requirements include: NO<sub>x</sub>, CO, VOC emission limits and VOC mass content destruction efficiency for the combustion chamber (CU1); for all Caterpillar engines NO<sub>x</sub>, CO, VOC and formaldehyde limits, and oxidation catalyst monitoring and maintenance, including installation of a thermocouple to measure the inlet catalyst temperature, and installation of a device to measure pressure drop across the catalyst; annual testing for NO<sub>x</sub>, CO and VOC for all Caterpillar engines and for the combustion chamber; testing for formaldehyde or CO reduction per 40 CFR Part 63 §63.6615 for all Caterpillar engines; compressor engine starter replacement conditions; distance piece vent VOC emission rate limits and quarterly testing; combustion chamber monitoring including installing a thermocouple and a continuous recording device (or equivalent) to detect the presence of the pilot flame; utilize a Leak Detection and Repair (LDAR) program following 40 CFR Part 60 Subpart KKK; and compliance with 40 CFR 60, Subpart Kb for *Volatile Organic Liquid Storage Vessels* (Affected sources are defined at §60.110b of the subpart, and currently include 1,000 bbl storage tanks T1-T3). All equipment authorized by MD-11560 has started-up, and performance tests have been conducted as required. This permit supersedes all previously issued permits for this facility.

Permit MD-14227 (6/17/13): updated the component count in vapor and liquid service and established the methodology for calculating fugitive VOC emissions. This permit superseded the condition regarding annual reporting of actual fugitive VOC emissions in permit MD-11560 and implemented updated requirements for the same. The facility shall also comply with 40 CFR 60, Subpart OOOO for *Crude Oil and Natural Gas Production, Transmission and Distribution* (Affected sources are defined at §60.5365 of the subpart. 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).

It should be noted that four temporary waivers were also issued for the facility, wv-12089 (6/7/11), wv-13594 (7/6/12), wv-14913 (5/2/13), and wv-16310 (5/6/14). These waivers applied for a limited time period and have expired. As such, they are not specifically described here and do not affect requirements in this operating permit modification.

The permit revisions include the following:

- The Table of Contents has been updated for repagination and to include references to NSPS Subparts Kb and OOOO requirements. The Division no longer includes the text of testing protocols or federal standards in Title V permits. The Wyoming Portable Analyzer Monitoring Protocol can be downloaded at <http://deq.state.wy.us/aqd/operating.asp>, or is available from the Division upon request. Federal subparts are available at <http://www.gpoaccess.gov/cfr/retrieve.html>, or from the Division upon request. Appendices A, B and C are replaced with currently applicable contents.
- General Information page is updated for latitude/longitude, plant manager contact, SIC and NAICS codes. Responsible official name is removed to be consistent with permits currently issued by the Division.
- The Source Emission Points table is updated for the new units and revised associated permits. Source ID's have been modified in the table and throughout the permit according to the updated operating permit application.
- The Total Facility Estimated Emissions Table is updated to reflect the emissions estimate from permit MD-14227. Table also now includes the GHG emissions estimate from the operating permit application.
- Condition F1 has been modified to identify engine type for clarity and update engine ID's. A new requirement from permit MD-11560 is added as F1(d). Based on a 2012 inspection report, all engine stack heights requirements are met and condition F1(b) is reserved.
- Condition F2 is a new condition requiring utilization of the LDAR program. All subsequent F conditions have been re-numbered to reflect the inclusion.
- Condition F3(a) has been modified to describe the tanks now authorized by permit MD-11560.
- Condition F4 is revised to include the applicable emission limits for the engines, combustion chamber and distance piece vent.
- Condition F5 has been updated to reflect wording currently used in operating permits issued by the Division for engine replacement requirements.
- Condition F6 has been modified to include the applicable operation requirements for the compressor engines, storage tanks and combustion chamber.
- The testing requirements in condition F7 have been revised to be consistent with operating permits currently issued by the Division and reflect the applicable conditions of permit MD-11560.
- Conditions F8 and F9 have been revised to include the monitoring requirements for the combustion chamber and to incorporate monitoring conditions for engines from permit MD-11560.
- Conditions F10 and F11 have been modified to include the catalyst monitoring for all engines, and additional monitoring required for the distance piece vent VOC emissions according to MD-11560. Condition F11(c) is added for clarity.

- Condition F12 is a new condition added for WAQSR Ch 7, Sec 3 Compliance Assurance Monitoring (CAM) of VOC emissions from the combustion chamber (CU1). Subsequent F conditions have been re-numbered to reflect the inclusion.
- Condition F13 is a new monitoring condition for the LDAR program from permit MD-11560 and VOC emissions calculations from permit MD-14227. Subsequent F conditions have been re-numbered to reflect the inclusion.
- Conditions F14 and F15 are modified to include recordkeeping for the combustion chamber, the storage tanks, the starter replacements, and distance piece vent VOC emissions monitoring. References to specific 40 CFR 60 Subpart JJJJ and 40 CFR 63 Subparts ZZZZ conditions are reserved from F14(g) and (h), as subpart requirement wording has been revised to be consistent with permits currently issued by the Division.
- Condition F16 is a new recordkeeping requirement for CAM monitoring. Subsequent F conditions have been re-numbered to reflect the inclusion.
- Condition F17 is a new recordkeeping condition for VOC emissions calculations per MD-14227. Subsequent F conditions have been re-numbered to reflect the inclusion.
- The notification and test reporting condition has been divided into two separate conditions, F18 and F19, and precede the monitoring reports condition (now F20), to be consistent with the operating permits currently issued by the Division and for clarity. Wording in these two conditions is also revised to include additional requirements from permit MD-11560 and to be consistent with operating permits currently issued by the Division.
- Condition F20 is modified to include the new reporting requirements for the combustion chamber, storage tanks, CAM monitoring, LDAR program, and distance piece vent VOC emissions. F20(d) is no longer needed; it was referencing reserved conditions F14(g) and (h).
- Condition F21 is modified to reflect wording used in operating permits currently issued by the Division for greenhouse gas reporting.
- Condition F23 is added to the permit requiring correction of pilot flame temperature indicator ranges and submitting a revised CAM plan.
- WAQSR Ch 5, Sec 2 NSPS and 40 CFR 60, Subparts Kb and OOOO are added to the permit. Wording for 40 CFR 60, Subpart JJJJ and 40 CFR 63, Subparts ZZZZ and DDDDD is revised to include wording used in operating permits currently issued by the Division.
- WAQSR Ch 7 Sec 3 CAM monitoring for the combustion chamber is added to the permit.
- The compliance certification requirements, condition C1, have been modified to indicate how to assess compliance with the new requirements in the permit and reflect cross-reference updates.
- The State Only Permit Conditions table is updated to reflect the current ambient standards.
- The Summary Tables are updated to reflect all the above changes and revised to be consistent with other operating permits currently being issued by the Division.
- Appendix A includes the Compressor Distance Piece Vent Testing Procedure.
- Appendix B includes the Fugitive VOC Emissions Calculation Methodology.
- Appendix C includes the Compliance Assurance Monitoring (CAM) Plan.

