

STATEMENT OF BASIS

To: Reviewers

Through: Lori Bocchino, Operating Permit Program Manager

From: Maggie Endres, Operating Permit Program

Subject: Draft Operating Permit 3-1-104-1 for Georgia-Pacific Gypsum LLC,
Lovell Plant

Date: April 25, 2012

Attached is the draft modification of Wyoming Air Quality Standards and Regulations (WAQSR) Ch 6, Sec 3 operating permit 3-1-104-1 for the Lovell Plant. Permit 3-1-104 was issued February 28, 2008. Waiver wv-10659 (6/28/10): allowed replacement of the existing primary jaw crusher, which experienced a catastrophic failure. Performance tests were completed October 25, 2010. Modeling requirements for ambient air standards have also been completed. Remaining requirements include: opacity limits on the crusher baghouse (unit 5) and fugitives associated with the crushing equipment; particulate limits from the crusher baghouse; use of the crusher baghouse during operation of the crusher conveyor belt; and daily observations for the presence of visible emissions. The new crusher is subject to 40 CFR 60 Subpart OOO for *Nonmetallic Mineral Processing Plants*.

The permit revisions include the following:

- Table of Contents: Repagination has been done as needed. Appendix B and C are reserved.
- Source Emission Points Table: is updated to reference the waiver listed above
- References throughout the permit are updated to include waiver wv-10659
- Condition F2: opacity and particulate emissions, includes requirements from wv-10659
- Condition F5: emissions testing includes baghouse unit 5 as subject to Subpart OOO
- Condition F7: monitoring, includes daily visible emissions monitoring for unit 5, and noting active operation of the crusher conveyor belt when the unit 5 baghouse is not operating
- Condition F9/F13: includes records/reports for active operation of the crusher conveyor belt when the crusher baghouse is not operating
- Condition F16 is a new condition regarding greenhouse gas reports
- 40 CFR 60 Subpart OOO include unit 5. The new formatting for subparts is substituted.
- Condition C1 reflects new requirements.
- Condition S1 reflects updates to the state PM_{2.5} and lead standards
- Summary Tables are updated to reflect new requirements, and for units 6 and 7, corrects the Corresponding Regulations for NO_x emissions