

STATEMENT OF BASIS

To: Reviewers

Through: ~~Lori Bocchino, Operating Permit Program Manager~~

From: Despina Nikolova, Air Quality Engineer

Subject: Draft Operating Permit 3-2-001-1 for Marathon Oil Company
Oregon Basin Gas Plant

Date: September 9, 2011

Attached is the draft modification of Wyoming Air Quality Standards and Regulations (WAQSR) Ch 6, Sec 3 operating permit 3-2-001-1 for the Oregon Basin Gas Plant. The operating permit is being modified to update the requirements from construction Permit MD-10728 (4/1/11) and 40 CFR 63 Subpart ZZZZ for *Stationary Reciprocating Internal Combustion Engines*, as revised March 9, 2011. (The Cooper Bessemer Compressor Engine, Emergency Back-up diesel Generator and Emergency Fire Water Pump diesel engine are currently existing engines at an area source under Subpart ZZZZ.)

Following operating permit 3-2-001, the Division also issued a number of waivers that applied for a limited time period and have since expired. These waivers are not specifically described here, as they do not affect requirements in the operating permit.

The permit revisions of note include the following:

- The Table of Contents indicates Appendix A (SO₂ and H₂S Minimization Plan), Appendix C (Portable Analyzer Monitoring Protocol), and Appendix E (40 CFR 63 Subpart ZZZZ) have been added to the permit; Repaginating has been done as needed
- Page 3 is updated for the Responsible Official (RO) and Plant manager
- Source Emission Points: the table is updated to reference permit MD-10728; References throughout the permit are updated to include the new permit
- Conditions F1, F2 and F3 have been modified to reflect requirements for SO₂ and H₂S emissions from permit MD-10728
- Conditions F4 have been modified to reflect current wording for SO₂ emission inventory
- Condition F7 has been modified to reflect current wording for temporary engine replacement
- Condition F9 has been modified to reflect requirements for SO₂ and H₂S emissions monitoring per permit MD-10728
- Condition F11 has been modified to require testing of the Cleaver Brooks boiler at least once every 5 years rather than maintenance, consistent with periodic monitoring for similar units in operating permits currently being issued by the state
- Condition F12 has been modified to require records related to the SO₂ and H₂S Minimization Plan

- Conditions F14, F15, F16, and F18 have been modified to reflect requirements for SO₂ and H₂S emissions from permit MD-10728 and current wording for reporting
- Condition F20 is a new condition for greenhouse gas reporting
- P63-ZZZZ conditions are added
- Condition C1 adds compliance certification requirements for SO₂ and NO_x requirements, greenhouse gas reporting and Subpart ZZZZ requirements
- Condition G4 is updated
- Condition S1 reflects updates to the state PM_{2.5} and lead standards
- The Summary Tables are updated to reflect Subpart ZZZZ requirements for the affected engines and changes in source specific requirements and monitoring per permit MD-10728
- Appendix A includes SO₂ and H₂S Minimization Plan
- Appendix C includes Portable Analyzer Monitoring Protocol
- Appendix E includes 40 CFR 63 Subpart ZZZZ