

## STATEMENT OF BASIS

To: Reviewers

Through: Lori Bocchino, Operating Permit Program Manager

From: Despina Nikolova, Air Quality Engineer

Subject: Draft Operating Permit 3-3-025-1 for Overland Trail Transmission, LLC  
North Baxter Compressor Station

Date: November 21, 2013 *Addendum March 3, 2014*

Attached for your review is the draft modification of Wyoming Air Quality Standards and Regulations (WAQSR) Ch 6, Sec 3 operating permit 3-3-025-1 for North Baxter Compressor Station. Permit 3-3-025 was issued October 15, 2012 and is being modified to incorporate new requirements which have become applicable to the North Baxter Compressor Station since the issuance of permit 3-3-025.

In August 2012, the Environmental Protection Agency promulgated 40 CFR 60, Subpart OOOO - *Standards of Performance for Crude Oil and Natural Gas Production, Transmission, and Distribution*, which were effective on October 15, 2012. These regulations establish emission standards and compliance schedules for the control of volatile organic compound (VOC) and sulfur dioxide (SO<sub>2</sub>) emissions from affected facilities that commence construction, modification or reconstruction after August 23, 2011. The regulations cover several types of emission units, including compressors and pneumatic controllers, which may become subject to Subpart OOOO when installed, replaced, or modified. Affected emission units at the North Baxter Compressor Station may be, or become, subject to Subpart OOOO during the term of this operating permit.

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 17, 2013, Overland Trail Transmission, LLC was notified that the Division intended to reopen operating permit 3-3-025 to add applicable requirements from 40 CFR 60, Subpart OOOO.

The permit revisions include the following:

- The Table of Contents is revised to include 40 CFR 60, Subpart OOOO to the list of applicable New Source Performance Standards (NSPS).
- The NSPS list is revised to include 40 CFR 60, Subpart OOOO requirements.
- Condition C1 is revised to include compliance certification requirements for 40 CFR part 60, Subpart OOOO and re-numeration of sub-conditions as appropriate.
- The State Only Permit Conditions table is updated to reflect the current ambient standards.

### *Addendum March 3, 2014*

*While the proposed permit was under EPA review, the Division was notified of a responsible official change. The update has been made in the general information section on page 3 of the permit. Additionally, condition S1 is updated to include wording used in permits currently issued by the Division. These changes are administrative in nature and do not warrant an additional public notice period.*