

## STATEMENT OF BASIS

To: Reviewers

Through: Lori Bocchino, Operating Permit Program Manager

From: Despina Nikolova, Air Quality Engineer

Subject: Draft Operating Permit 3-2-135-2 for P4 Production, LLC  
Rock Springs Coal Calcining Plant

Date: March 6, 2014

Attached for your review is the draft modification of Wyoming Air Quality Standards and Regulations (WAQSR) Chapter 6, Section 3 operating permit 3-2-135-2 for the Rock Springs Coal Calcining Plant. Permit 3-2-135-1 was issued September 24, 2012 and is being modified to incorporate new requirements which have become applicable to the Rock Springs Coal Calcining Plant since the issuance of permit 3-2-135-1.

On March 28, 2012, the Air Quality Division updated the WAQSR Chapter 14, Section 3 for the Sulfur Dioxide Milestone Inventory, to revise measurement techniques and baseline date language. The Rock Springs Coal Calcining Plant is subject to these requirements.

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 15, 2013, P4 Production, LLC was notified that the Division intended to reopen operating permit 3-2-135-1 to update the applicable requirements from WAQSR Chapter 14, Section 3 and incorporate any new requirements from the WAQSR Chapter 6, Section 2 permit MD-13965.

Permit MD-13965 (1/15/13) was issued to modify the Rotary Hearth Calciner at the Rock Springs Coal Calcining Plant with the installation of one 55 MMBtu/hr propane fired burner (unit 1PFB) for preheating the air in the afterburner area prior to the entrance to the rotary hearth calciner and discharge table (main stack) (unit 1). Applicable requirements from this permit include defining when the burner may be used; annual operating hours limits; and recordkeeping. These requirements are included in the operating permit as specified below.

The permit revisions include the following:

- The Table of Contents is revised for updated repagination as appropriate.
- The Source Emission Points table is updated to include the propane fired burner (unit 1PFB). The description for unit 1 is revised for clarity.
- The Total Facility Estimated Emissions table is updated to include emissions from the propane fired burner.
- The visible emission requirement in condition F4(c) is revised to account for recent changes to WAQSR Chapter 3, Section 2 for diesel fired engines.
- Condition F6 includes operation requirements for the propane fired burner.
- F13 is modified to include monitoring annual operating hours, and dates and durations of cold start-ups for the propane fired burner.

- Condition F16 includes recordkeeping requirements for the propane fired burner's operating hours and cold start-ups.
- Condition F19 is revised to reflect current WAQSR Chapter 14, Section 3 baseline data requirements.
- Condition F22 includes reporting requirements of operating hours for the propane fired burner.
- Condition C1 is revised to include compliance certification requirements for the propane fired burner and re-numeration of sub-conditions, as appropriate.
- The State Only Permit Conditions table is updated to reflect the current ambient standards and include wording used in permits currently issued by the Division.
- The Summary Tables are updated to include the propane fired burner and the revised unit 1 description.
- The CAM plan attached as Appendix A to the permit is revised to include the propane fired burner.