

STATEMENT OF BASIS

To: Reviewers

Through: Lori Bocchino, Operating Permit Program Manager

From: Despina Nikolova, Air Quality Engineer

Subject: Draft Operating Permit 3-2-036-1 for Questar Pipeline Company
Coleman/Kanda/Nightingale/Rock Springs Compressor Complex

Date: September 12, 2011

Attached is the draft modification of Wyoming Air Quality Standards and Regulations (WAQSR) Ch 6, Sec 3 operating permit 3-2-036-1 for the Coleman/Kanda/Nightingale Compressor & Gas Processing Complex. Permit 3-2-036 was issued May 20, 2009. Permit MD-8752 (6/30/09): allowed modification of the compressor complex with the addition of one 13,088 hp Solar Mars 100-16000S turbine (RS-TUR2) at the Rock Springs Station. The permit sets NO_x, CO and VOC emission limits for the turbine engine, and requires maintenance to be performed on the engine. The turbine engine is subject to the requirements of 40 CFR Part 60, Subpart KKKK, New Source Performance Standards for stationary combustion turbines. Permit MD-8950 (7/27/09): was issued to modify the Coleman Compressor Station with the replacement of the fuel delivery system on C-ENG1, and revised the current NO_x permit limit from 3.0 g/hp-hr to 2.0 g/hp-hr. This permit revised and superseded the requirements of permit MD-333A (5/23/2008) and set §60.4400 of 40 CFR Part 60, Subpart KKKK testing requirement for turbine engines C-TUR2, K-TUR1, K-TUR2, K-TUR3, K-TUR4, N-TUR1, N-TUR2 and N-TUR3. Permit MD-1577A (10/15/10): revised the VOC emissions for the Solar Mars 100-15000S turbine (RS-TUR1) at the Rock Springs Station and restated most of the conditions of MD-1577 (5/21/2007). This permit supersedes permit MD-1577 (5/21/2007).

The operating permit is being modified to include the requirements of the permits discussed above and the following: the two removed Onan standby generators K-GEN1 and N-GEN1; the decommissioned and removed Kanda gas processing plant units as follows: Kanda Vapor Recovery Unit K-VRU, Kanda Pressurized Condensate Tank #1 and #2 (Bullet Tanks K-BLT1 and K-BLT2), and Kanda Processing Plant Fugitive Emissions K-FUG2. Additionally, the operating permit is being modified to include the requirements from 40 CFR 60 Subpart JJJJ for Stationary Spark Ignition Internal Combustion Engines and 40 CFR 63 Subpart ZZZZ for Stationary Reciprocating Internal Combustion Engines, as revised Aug. 20, 2010.

All reciprocating internal combustion engines, the compressor and generator engines (C-ENG1, C-GEN1, C-GEN2, K-GEN2, N-GEN2, and RS-GEN1), are subject to the requirements of 40 CFR 63 Subpart ZZZZ at an area source. At the time of the writing of this Statement of Basis, the engines do not have any requirements under Subpart JJJJ based on the date of manufacture of these engines. However, as required by the temporary engine replacement condition of the operating permit, if an engine is replaced or reconstructed, subpart applicability will need to be reevaluated and a statement regarding applicability submitted to the Division.

The permit revisions include the following:

- The Table of Contents indicates Appendix C (40 CFR 60 Subpart JJJJ) has been added, and Appendix D (40 CFR 60 Subpart KKKK) and Appendix E (40 CFR 63 Subpart ZZZZ) have been modified. Repagination has been done as needed
- In General Information, the responsible official and process description have been updated.
- Source Emission Points: the table is updated to reference permits MD-8752, MD-8950 and MD-1577A; References throughout the permit are updated to include the new permits. The engines indicate type, and engine RS-TUR2 has been added
- Total Facility Estimated Emissions: is updated
- Condition F1 is a new Facility-Wide Engine Configuration Permit Condition per MD-8950; All subsequent F conditions have been re-numbered to reflect the inclusion
- Condition F2(a) is no longer needed
- Condition F3 includes the new emission limits for engine C-ENG1 and new turbine engine RS-TUR2
- Condition F4 is updated for new required preventative engines maintenance
- Condition F5 includes the most recent language regarding temporary engine replacement
- Condition F6 is no longer needed
- Condition F8 includes updated testing requirements
- Condition F10 includes new updated monitoring for the compressor and all turbine engines
- Condition F11 includes new updated monitoring for the standby generator engines; the language giving justification for no additional monitoring has been deleted
- Condition F12(a), (d) and (e) are no longer needed; Condition F12 is updated for the new turbine engine operation monitoring
- Condition F13 is updated to specify fuel consumption and gas analysis records for the turbines.
- Condition F14 is updated for the new operation monitoring records, F14(c) and (d) have been removed and the language in (e) placed in (c)
- Condition F16 is a new condition requiring notification of tests and of shutdown and removal of engines
- Condition F17(a)(ii) thru (iv) are no longer needed
- Condition F18 is a new condition for greenhouse gas reporting
- P60-GG conditions are updated to include the most recent language and reflect MD-8950
- P60-JJJJ conditions are new and reflect the Oct. 8, 2008 revisions
- P60-KKK conditions are no longer needed

- P60-KKKK conditions are updated to include the most recent language
- P63-ZZZZ conditions are updated to reflect the Aug. 20, 2010 revisions
- Condition C1 adds compliance certification requirements for greenhouse gas reporting, and updated Subparts JJJJ, KKKK and ZZZZ requirements
- Condition G4 is updated
- Condition S1 reflects updates to the state PM_{2.5} and lead standards
- Summary Tables are updated to reflect the requirements and limits from MD-8752, MD-8950, MD-1577A and the subparts listed above
- Appendix B includes Subpart JJJJ as revised June 28, 2011
- Appendix E includes Subpart KKKK as revised Mar. 20, 2009
- Appendix F includes Subpart ZZZZ as revised Mar. 9, 2011

