STATEMENT OF BASIS

To: Reviewers

Through: Lori Bocchino, Operating Permit Program Manager

From: Hillary Killorn, P.E., Operating Permit Engineer

Subject: Draft Chapter 6, Section 3 Operating Permit 3-3-141-1, Rocky Mountain Pipeline System, LLC, Granger Station

Date: November 24, 2013 *Addendum March 3, 2014*

Attached for your review is the draft modified Wyoming Air Quality Standards and Regulations (WAQSR) Chapter 6, Section 3 operating permit 3-3-141-1 for the Rocky Mountain Pipeline System, LLC, Granger Station. The operating permit is being modified to incorporate new requirements which have become applicable to the Granger Station since the issuance of permit 3-3-141 on May 22, 2012.

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_2) emissions from affected facilities that commence construction, modification or reconstruction after August 23, 2011. The regulations cover several types of emission units, including pneumatic controllers and tanks, which may become subject to Subpart OOOO when installed, replaced, or modified. Affected emission units at the Granger 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 23, 2013, Rocky Mountain Pipeline System, LLC was notified that the Division intended to reopen operating permit 3-3-141 to add applicable requirements from 40 CFR 60, Subpart OOOO.

The operating permit revisions include the following:

- Table of Contents: revised to denote that 40 CFR 60, Subpart OOOO has been added to the list of applicable New Source Performance Standards (NSPS).
- General Information: corrected latitude/longitude coordinates.
- NSPS List: revised to include 40 CFR 60, Subpart OOOO requirements.
- Condition C1: revised to include compliance certification requirements for 40 CFR 60, Subpart OOOO and renumeration of sub-conditions as appropriate.
- State Only Permit Conditions: updated to be consistent with recent revisions to the state ambient standards.

Addendum March 3, 2014

Condition S1 is updated to include wording used in permits currently issued by the Division. This change is administrative in nature and does not warrant an additional public notice period.