

STATEMENT OF BASIS

To: Reviewers

Through: Lori Bocchino, Operation Permit Program Manager

From: Maggie Endres, Operating Permit Program

Subject: Draft Modified Operating Permit 3-1-123-2, TATA Chemicals (Soda Ash) Partners Green River Works

Date: November 26, 2012 (*Amended February 22, 2013*)

Attached is a draft of Wyoming Air Quality Standards and Regulations (WAQSR) Ch 6, Sec 3 modified operating permit 3-1-123-2 for the Green River Works. The permits/waivers listed below have been issued since issuance of the original operating permit, 3-1-123. The permit is being modified to incorporate remaining applicable requirements from these permitting actions.

AP-7471 (3/26/08): allowed the permittee to conduct trial test loading of rail cars with trona ore. The waiver was extended for six months under AP-8737 listed below.

AP-7835 (6/18/08): increased the coal stockpile size.

AP-8737 (12/16/08): extended waiver AP-7471. Five year recordkeeping requirements remain.

MD-6046 (8/7/09): authorized retrofit of the C and D boilers. The permit limits particulate emissions for both boilers and requires annual testing.

wv-10888 (7/6/10): allowed replacement of the #1 dryer steam tube heat exchanger.

wv-10954 (8/9/10): allowed a test project of pollution control effectiveness of a pilot plant.

MD-10837 (12/22/10): revised NO_x emissions for the C and D boilers before and after installation of separated overfire air (or equivalent performing technology). The permit also defines exceedances of NO_x emissions.

wv-11811 (3/25/11): allowed replacement of the #2 dryer steam tube heat exchanger.

wv-11733 (4/22/11): modified operations to allow replacement of 376 generator back steam tubes, 92 wall tubes and 75 screen tubes in the D boiler. The project is to be monitored for a period of five years to ensure the project does not result in a major modification under WAQSR Ch 6, Sec 4.

wv-12001 (6/17/11): allowed the permittee to conduct a temporary process test. The process was subsequently addressed under wv-13858 listed below.

wv-12409 (9/8/11): authorized temporary truck and railcar loading. Five year recordkeeping requirements remain.

wv-12621 (10/18/11): allowed temporary railcar loading. Five year recordkeeping requirements remain.

wv-13224 (4/11/12): authorized temporary installation of a prototype pilot plant for pollution control of either the C or D boiler.

wv-13858 (9/28/12): authorized melting of sodium carbonate decahydrate (DECA) from disposal area (F-cell) to the plant. The waiver requires that the roads and DECA be treated to control fugitive dust.

MD-567A (10/12/12): modified MD-567 to remove an hours limit that had been set on four baghouse sources, and remove conditions for a dryer which was not constructed. MD-567A retained the limits for particulate emission and soda ash production that had been set by MD-567.

wv-13859 (10/15/12): acknowledged installation of five previously unpermitted emergency diesel engines. The waiver requires that each engines be equipped with an hours meter and that the engines and monitoring equipment be maintained. The permittee shall comply with any applicable requirements of 40 CFR 60 Subpart IIII and 40 CFR 63 Subpart ZZZZ.

The permit revisions include the following:

- The Table of Contents is updated to include the new subparts. 40 CFR Parts 60 and 63 subparts are no longer included as appendices in permits issued by the Division, and have been removed from the permit and Table of Contents.
- Source Emission Points Table: includes the five diesel engines and new permits/waivers
- The Total Facility Estimated Emissions table is updated
- References throughout the permit are updated to include the new permits/waivers
- Condition F4: includes new conditions from wv-13858 which address fugitive emissions from the DECA melting operation.
- Conditions F5 and F6: include new requirements for the C and D boilers, and the emergency engines
- Condition F7: increases the coal stockpile limit consistent with AP-7835
- Condition F8: has eliminated the hours limits for the baghouses
- Condition F10: updates testing requirements for the C and D boilers
- Condition F11: has been modified to reflect current wording in permits being issued by the Division
- Condition F12: eliminates the monitoring for baghouse operating hours
- Condition F13: includes monitoring for dust suppression for the DECA melting operation
- Condition 14: updates wording referring to federal standards and includes monitoring for the emergency engines
- Condition F16: clarifies references to federal standards
- Condition F18: removes recordkeeping for baghouse operating hours
- Condition F19: includes recordkeeping for dust suppression application
- Condition F21: reflects current wording for Division permits and includes recordkeeping for the emergency engines

- Condition F23: clarifies recordkeeping for the SO₂ and NO_x CEMs
- Condition F25: removes reporting for baghouse operating hours
- Condition F26: clarifies reporting requirements for the coal stockpile
- Condition F28: reflects current wording in permits issued by the Division
- Condition F30: updates reporting requirements for the C, D and E boilers
- Condition F33-F37: are new conditions to address PSD (Prevention of Significant Deterioration) Applicability Demonstration Requirements and project recordkeeping requirements for trona ore rail car loading
- The subpart references are updated. 40 CFR 60 Subpart IIII is added for engine EM-3. With regards to Subpart DDDDD for Industrial, Commercial, and Institutional Boilers And Process Heaters, the Division is in the process of removing Subpart DDDDD as published in the Federal Register September 13, 2004 from the state regulations. Upon completion of this process the state rule will no longer apply. However, the permittee is subject to the most recent 40 CFR Part 63 version of Subpart DDDDD.
- Condition C1: has been updated to include new and revised conditions
- Condition S1: includes updated state only conditions for PM_{2.5} and lead
- The summary tables are updated and includes a table for the emergency engines and the DECA melting operation
- The CAM plan is updated to reflect data from the most recent testing

Addendum (Amended February 22, 2013)

References to Subpart DDDDD as published in the Federal Register September 13, 2004 are removed from the permit, as it has been removed from state regulations. Condition S1 is updated to reflect the state's current ambient standards for nitrogen dioxide, sulfur dioxide, and ozone which were revised on December 19, 2012. As these changes are administrative in nature, no additional public notice period is warranted.

