

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 3-0-261-1, Thunder Creek Gas Services, LLC, MTG Compressor Station
Date: November 22, 2013 *Addendum February 14, 2014*

Attached for your review is the draft modified Wyoming Air Quality Standards and Regulations (WAQSR) Chapter 6, Section 3 operating permit 3-0-261-1 for the Thunder Creek Gas Services, LLC, MTG Compressor Station. Permit 3-0-261 was issued April 23, 2013 and was administratively amended on September 12, 2013 to revise Responsible Official contact information. The operating permit is being modified to incorporate new requirements which have become applicable to the MTG Compressor Station since the issuance of permit 3-0-261.

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 (SO₂) 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 MTG 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 23, 2013, Thunder Creek Gas Services, LLC was notified that the Division intended to reopen operating permit 3-0-261 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).
- 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 reenumeration of sub-conditions as appropriate.

Addendum

Condition S1 is revised to include language used in current permits issued by the Division.