

## STATEMENT OF BASIS

To: Reviewers

Through: Lori Bocchino, Operating Permit Program Manager

From: Despina Nikolova, Air Quality Engineer

Subject: Draft Operating Permit 3-0-245-2 for Warren Energy Services, LLC  
Sun Dog Compressor Station

Date: February 20, 2014

Attached for your review is the draft modification of Wyoming Air Quality Standards and Regulations (WAQSR) Chapter 6, Section 3 operating permit 3-0-245-2 for the Sun Dog Compressor Station. Permit 3-0-245-1 was issued March 18, 2013 and is being modified to incorporate new requirements which have become applicable to the Sun Dog Compressor Station since the issuance of permit 3-0-245-1.

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<sub>2</sub>) 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 Sun Dog 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 17, 2013, Warren Energy Services, LLC was notified that the Division intended to reopen operating permit 3-0-245-1 to add applicable requirements from 40 CFR 60, Subpart OOOO.

Four engines (Sun8/E8-Sun11/E11) and two dehy units with reboilers (D2a/D2b and D3a/D3b) are no longer authorized to be constructed at this facility. Additionally, one engine (Sun6/E6) has been permanently removed from operation. All references to and applicable requirements for these units are removed from the permit as specified below.

The permit revisions include the following:

- The Table of Contents has been revised to include 40 CFR 60, Subpart OOOO to the list of applicable New Source Performance Standards (NSPS) and was updated for repagination.
- The engines' source IDs are updated for clarity throughout the permit.
- The Source Emission Points Table is updated to remove units no longer operating or authorized to be built at the facility, indicate that one tank (T2) has been installed, and clarify the tank sizes and descriptions.

- The Total Facility Estimated Emissions Table is updated to reflect emissions from units operating at the facility.
- References to and applicable requirements for unauthorized or uninstalled equipment are removed from conditions F1, F3, F4, F8, F12, F13, and F15. Conditions F5 (commencement of construction) and F7 (initial performance testing), and F14(a) and (b) (commencement of construction and start-up notifications) are reserved.
- The NSPS list has been revised for 40 CFR 60, Subpart JJJJ and to include 40 CFR 60, Subpart OOOO requirements. References to uninstalled units have been removed from the other NSPS and NESHAP Subparts.
- Condition C1 is revised to include compliance certification requirements for 40 CFR part 60, Subpart OOOO and re-numeration of sub-conditions as appropriate.
- Condition S1 is revised to clarify the application of state ambient standards and be consistent with permits currently being issued by the Division.
- The Summary Tables are updated to reflect changes in the permit.