

STATEMENT OF BASIS

To: Reviewers

Through: Lori Bocchino, Operating Permit Program Manager

From: Despina Nikolova, Air Quality Engineer

Subject: Draft Operating Permit 3-2-094-1 for Western Sugar Cooperative
Torrington Factory

Date: May 13, 2013

Attached is the draft modification of Wyoming Air Quality Standards and Regulations (WAQSR) Ch 6, Sec 3 operating permit 3-2-094-1 for Western Sugar Cooperative, Torrington Factory. Permit 3-2-094 was issued December 21, 2011 and is being modified to incorporate applicable requirements from the following WAQSR Ch 6, Sec 2 waivers, and to update wording to be consistent with permits currently issued by the Division.

Four temporary waivers were issued for the facility, wv-12491 (10/4/11), wv-12179 (11/2/11), wv-12926 (1/31/12), and wv-13876 (9/12/12), which applied for a limited time period and have expired. These waivers are not specifically described here, as they do not affect requirements in the operating permit.

Permit Waiver wv-12915 (5/24/12): was issued for repair of the tubes on the #1 Union Boiler (unit 002). To demonstrate the project does not result in a major modification under WAQSR Ch 6, Sec 4, the permittee is required to track actual NO_x emissions from the #1 Union Boiler for five years using a tested emission rate and annual fuel usage. Additional requirements include maintaining records and submitting annual NO_x emissions.

The permit revisions include the following:

- The Table of Contents has been updated to include the Prevention of Significant Deterioration (PSD) applicability demonstration requirements. Appendices B, C and D are reserved, as the Division no longer includes the text of federal standards in Title V permits.
- The Source Emission Points table is updated to add waiver wv-12915.
- The Total Facility Estimated Emissions Table is updated to reflect the waiver wv-12915 estimate.
- The compliance assurance monitoring (CAM) plan for the Pulp Dryer (units 005/006) and the Lime Kilns (unit 044) was amended on January 17, 2013. Condition F9(b) has updated wording to correspond with the CAM amendment.
- Conditions F25 through F29 are added to include the PSD applicability demonstration requirements from wv-12915. Because the #1 Union Boiler is allowed to burn fuel oil under the alternative operating scenario specified in conditions A1 through A4, additional monitoring, recordkeeping, and reporting requirements are included to address the alternative scenario.
- The permit condition wording for 40 CFR 63 Subpart JJJJJ has been modified to be consistent with language used in permits currently issued by the Division.
- Condition C1 is updated to include certification requirements for the #1 Union Boiler (unit 002) project PSD applicability demonstration and the greenhouse gas reporting. The Subpart JJJJJ requirement is updated to reflect current permit wording.
- The State Only Permit Conditions table is updated to reflect the new ambient standards.

- The Summary Tables are updated to include requirements for the #1 Union Boiler (unit 002) project PSD applicability demonstration, clarify the fuel oil nitrogen and sulfur contents applicability for the #1 Union Boiler (unit 002), #2 Union Boiler (unit 003) and the Pulp Dryer (unit 005/006) as oil fired sources, and to revise Subpart JJJJJ wording for the Stirling Coal Fired Boilers #3-#6 (unit 004) to be consistent with current permits.