

## STATEMENT OF BASIS

To: Reviewers  
Through: Lori Bocchino, Operating Permit Program Manager  
From: Rita Piroutek, Operating Permit Program  
Subject: Draft Operating Permit 3-0-241-2 for WGR Asset Holding Company LLC,  
Amazon-Congo Compressor Station  
Date: November 18, 2013 *Addendum February 26, 2014*

Attached for your review is the draft modified Wyoming Air Quality Standards and Regulations (WAQSR) Chapter 6, Section 3 operating permit 3-0-241-1-2 for the WGR Asset Holding Company LLC, Amazon-Congo Compressor Station. Permit 3-0-241-1 was issued March 19, 2013. The operating permit is being modified to incorporate new requirements which have become applicable to the Amazon-Congo Compressor Station since the issuance of permit 3-0-241-1.

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 Amazon-Congo 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 15, 2013, WGR Asset Holding Company LLC was notified that the Division intended to reopen operating permit 3-0-241-1 to add applicable requirements from 40 CFR 60, Subpart OOOO.

The engine Congo #10, a Waukesha F3524GSI engine, was removed from the facility on August 30, 2013. All references to the engine Congo #10 are removed from the permit as specified below.

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).
- References to engine Congo #10 and its associated emissions are removed from the Source Emission Points Table, the Total Facility Estimated Emissions Table, and condition F1.
- Condition F10 was revised by adding "reboilers" for clarification.
- All authorized engines and associated catalyst monitoring equipment are installed. Therefore, the word "install" was removed from conditions F12(a) and F12(b).
- NSPS list: Subpart JJJJ is revised to reflect the removal of engine Congo #10 and to update the subpart applicability; Subpart OOOO is added.
- Condition C1 revised to include compliance certification requirements for 40 CFR part 60, Subpart OOOO and re-numeration of sub-conditions as appropriate.
- The summary tables are updated to remove engine Congo #10.

*Addendum February 26, 2014*

*Condition S1 is updated to reflect wording used in permits currently issued by the Division.*