

STATEMENT OF BASIS

To: Reviewers
Through: Lori Bocchino, Operating Permit Program Manager
From: Rita Piroutek, Air Quality Engineer
Subject: Draft Operating Permit 3-0-260-1, WGR Asset Holding Company LLC
Bear Draw - Bruin Compressor Station
Date: November 25, 2013 *Addendum March 4, 2014*

Attached for your review is the draft modified Wyoming Air Quality Standards and Regulations (WAQSR) Chapter 6, Section 3 operating permit 3-0-260-1 for the WGR Asset Holding Company LLC, Bear Draw - Bruin Compressor Station. Permit 3-0-260 was issued March 1, 2013. The operating permit is being modified to incorporate new requirements which have become applicable to the Bear Draw - Bruin Compressor Station since the issuance of permit 3-0-260.

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 Bear Draw - Bruin 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 3-0-260 to add applicable requirements from 40 CFR 60, Subpart OOOO.

Engines E1 and E5, previously authorized under WAQSR Ch 6, Sec 2 permit MD-9108A, have been installed since the issuance of operating permit 3-0-260. Initial performance tests have been successfully completed. The operating permit is updated to reflect the current engine configuration as specified below.

The permit revisions include the following:

- Table of Contents: revised to denote that 40 CFR 60, Subpart OOOO is added to the list of applicable New Source Performance Standards (NSPS).
- The Source Emission Points Table, the Total Facility Estimated Emissions Table, and conditions F1, F3, and F8 are updated to reflect the current engine configuration at the facility.
- A typo is corrected in paragraph (v) of condition F7.
- Condition F9 is revised by adding "reboilers" for clarification.
- NSPS list: Subpart JJJJ is revised to include engines E1 and E5, and Subpart OOOO is added.
- Condition C1 is revised to include compliance certification requirements for Subpart OOOO and re-enumeration of sub-conditions, as appropriate.
- The Summary tables are updated accordingly.

Addendum March 4, 2014

Condition S1 is updated to include wording used in permits currently issued by the Division. This change is administrative in nature and does not warrant an additional public notice period.