

## STATEMENT OF BASIS

To: Reviewers

Through: Lori Bocchino, Operating Permit Program Manager

From: Despina Nikolova, Air Quality Engineer

Subject: Draft Operating Permit 3-0-248-1 for WGR Asset Holding Company LLC  
Indian Creek-Crow Compressor Station

Date: November 27, 2013 *Addendum March 4, 2014*

Attached for your review is the draft modification of Wyoming Air Quality Standards and Regulations (WAQSR) Chapter 6, Section 3 operating permit 3-0-248-1 for the Indian Creek-Crow Compressor Station. Permit 3-0-248 was issued February 22, 2013 and is being modified to incorporate new requirements which have become applicable to the Indian Creek-Crow Compressor Station since the issuance of permit 3-0-248.

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 Indian Creek-Crow 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 3-0-248 to add applicable requirements from 40 CFR 60, Subpart OOOO.

Seven engines (E3, E5, E6, E12-E14, and E16); one dehy unit with reboiler (D2a/D2b); and one tank (T2) are no longer authorized to be constructed at this facility. 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 Source Emission Points and Total Facility Estimated Emissions tables have been updated to reflect the current engine configuration and associated emissions.
- References to and applicable requirements for uninstalled equipment are removed from conditions F1, F3, F6, F9, F12, F13, and F14. Conditions F5 (Commencement to Construct) and F8 (Initial Performance Testing) are reserved.

- The NSPS list has been revised 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.
- The Summary Tables are updated to reflect changes in the permit.

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.*