

## STATEMENT OF BASIS

To: Reviewers  
Through: Lori Bocchino, Operating Permit Program Manager  
From: Rita Piroutek, Air Quality Engineer  
Subject: Draft Operating Permit 3-1-210-2 for WGR Asset Holding Company LLC, Pumpkin-Bruno Compressor Station  
Date: January 3, 2013 *Addendum February 19, 2014*

Attached for your review is the draft modified Wyoming Air Quality Standards and Regulations (WAQSR) Chapter 6, Section 3 operating permit 3-1-210-2 for the WGR Asset Holding Company LLC, Pumpkin-Bruno Compressor Station. Permit 3-1-210-1 was issued April 19, 2013. The operating permit is being modified to incorporate new requirements which have become applicable to the Pumpkin-Bruno Compressor Station since the issuance of permit 3-1-210-1.

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 Pumpkin-Bruno 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 3-1-210-1 to add applicable requirements from 40 CFR 60, Subpart OOOO.

Since the issuance of permit 3-1-210-1 engines E16 through E18 (Bruno #8 through Bruno #10) have been removed from the facility. All references to and requirements for these engines are removed from the permit as specified below.

The operating permit revisions include the following:

- Table of Contents is revised to denote that 40 CFR 60, Subpart OOOO has been added to the list of applicable New Source Performance Standards (NSPS).
- The Source Emission Points Table, the Total Facility Estimated Emissions Table, conditions F1 and F8, and the attached CAM plan are updated to reflect the current engine configuration at the facility.
- Condition F7 is revised to specify dehydration unit reboilers and correct the unit ID's to D1b - D3b.
- A typo is corrected in condition F8(c) to refer to Section 10.1.1.1.
- The NSPS list is revised to update Subpart JJJ applicability and to include Subpart OOOO requirements.
- Condition C1 is revised to include compliance certification requirements for 40 CFR 60, Subpart OOOO and re-numeration of sub-conditions as appropriate.
- Sulfur Dioxides is corrected to Sulfur Dioxide in condition S1. *Permit language currently used in permits issued by the Air Quality Division is also updated.*
- The Summary Tables are updated to reflect the current engine configuration and to include a missing reference to one of the TEG dehydration units (D3a).
- The CAM plan has been updated to remove references to engines E16-E18.