

## STATEMENT OF BASIS

To: Reviewers

Through: Lori Bocchino, Operating Permit Program Manager

From: Rita Piroutek, Air Quality Engineer

Subject: Draft Operating Permit 3-0-249-2 for WGR Asset Holding Company LLC,  
Westwind-Astra Compressor Station

Date: December 2, 2013 *Addendum March 17, 2014*

Attached for your review is the draft modified Wyoming Air Quality Standards and Regulations (WAQSR) Chapter 6, Section 3 operating permit 3-0-249-2 for the WGR Asset Holding Company LLC, Westwind-Astra Compressor Station. Permit 3-0-249-1 was issued April 23, 2013. The operating permit is being modified to incorporate new requirements which have become applicable to the Westwind-Astra Compressor Station since the issuance of permit 3-0-249-1.

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 Westwind-Astra 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 3-0-249-1 to add applicable requirements from 40 CFR 60, Subpart OOOO.

A new WAQSR Chapter 6, Section 2 permit was issued for the facility on October 15, 2013. Permit MD-10706A was issued to extend the authorization to construct engines E6 and E8 until September 6, 2014. This permit superseded MD-10706 upon permit issuance.

The dehydration unit D3a and the associated reboiler D3b were installed on July 7, 2011.

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) and repagination as appropriate.
- The Source Emission Points Table, the Total Facility Estimated Emissions Table, Summary Tables, and conditions F1, F5, and F13 were updated to reflect the current engine configuration at the facility.

- All references to permit MD-10706 were updated to permit MD-10706A throughout the permit.
- Condition F1(c) was updated to list only the engines that have not been installed (E6, E8) or inspected yet for the stack height (E10).
- Condition F5 was updated for the current commencement of construction date.
- Condition F7(ii) was updated to clarify that only engine E6 is subject to the initial formaldehyde performance testing.
- A typo was corrected in conditions F7(ii) and F8(iv) to refer to Section 10.1.1.1.
- Condition F9 was revised by adding “reboilers” for clarification.
- Condition F11(b) was updated to reflect the revised permitting language from permit MD-10706A.
- Dehydration unit D3a and associated reboiler D3b are installed; the NSPS for Subpart HH and the source summary tables were updated.
- Subpart OOOO is added to the NSPS list.
- Condition C1 is revised to include compliance certification requirements for Subpart OOOO and re-numeration of sub-conditions as appropriate.

Addendum March 17, 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.*