

## STATEMENT OF BASIS

To: Reviewers  
Through: Lori Bocchino, Operating Permit Program Manager  
From: Hillary Killorn, P.E., Operating Permit Engineer  
Subject: Draft Chapter 6, Section 3 Operating Permit 3-0-252-1, WGR Operating LP, Bison Treating Facility  
Date: November 22, 2013

Attached for your review is the draft modified Wyoming Air Quality Standards and Regulations (WAQSR) Chapter 6, Section 3 operating permit 3-0-252-1 for the WGR Operating LP, Bison Treating Facility. The operating permit is being modified to incorporate new requirements which have become applicable to the Bison Treating Facility since the issuance of permit 3-0-252 on November 13, 2012.

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 Bison Treating Facility 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 23, 2013, WGR Operating LP was notified that the Division intended to reopen operating permit 3-0-252 to add applicable requirements from 40 CFR 60, Subpart OOOO.

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 required.
- NSPS List: revised to include 40 CFR 60, Subpart OOOO requirements.
- Condition C1: revised to include compliance certification requirements for 40 CFR 60, Subpart OOOO and renumeration of sub-conditions as appropriate.
- State Only Permit Conditions: updated to be consistent with recent revisions to the state ambient standards.