

STATEMENT OF BASIS

To: Reviewers

Through: Lori Bocchino, Operating Permit Program Manager

From: Rita Piroutek, Air Quality Engineer

Subject: Draft Operating Permit 3-2-032-2 for WGR Operating LP, Granger Gas Plant

Date: November 22, 2013 *Addendum March 3, 2014*

Attached for your review is the draft modified Wyoming Air Quality Standards and Regulations (WAQSR) Chapter 6, Section 3 operating permit 3-2-032-2 for the WGR Operating LP, Granger Gas Plant. Permit 3-2-032-1 was issued February 22, 2013. The operating permit is being modified to incorporate new requirements which have become applicable to the Granger Gas Plant since the issuance of permit 3-2-032-1.

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 (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 Granger Gas Plant 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 Operating LP was notified that the Division intended to reopen operating permit 3-2-032-1 to add applicable requirements from 40 CFR 60, Subpart OOOO.

The 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).
- In condition F9 a typo was corrected to refer to section 10.1.1.1.
- In condition F25 a typo was corrected to refer to G19.
- NSPS revisions include current applicability determination for Subpart JJJJ and the addition of Subpart OOOO.
- Condition C1 is updated to include compliance certification requirements for 40 CFR 60, Subpart OOOO and re-numeration of sub-conditions, as appropriate.

Addendum March 3, 2014

While the proposed permit was under EPA review, the Division was notified of a responsible official change. The update has been made in the general information section on page 3 of the permit. Additionally, condition F2(b) is modified to reflect recent changes to visible emission limits in WAQSR Chapter 3, Section 2 for diesel-fired engines. Condition S1 is updated to include wording used in permits currently issued by the Division. These changes are administrative in nature and do not warrant an additional public notice period.