

STATEMENT OF BASIS

To: Reviewers

Through: Michael Stoll, Operating Permit Program Manager 

From: Jamie O'Dell, Operating Permit Engineer 

Subject: Draft Operating Permit 3-1-016-2 for Williams Field Services Company, Echo Springs Gas Plant

Date: September 13, 2007

Attached for your review is a draft Wyoming Air Quality Standards and Regulations (WAQSR) Chapter 6, Section 3 operating permit modification for Williams Field Services Company, Echo Springs Gas Plant. The operating permit is being modified to incorporate an additional Chapter 6, Section 2 permit and to make the permit consistent with other permits being issued by the Division at this time.

Permitting History

Permit MD-1001 (5/18/2004) was issued to revise the size of the TXP 3 regeneration heater, the VOC emission rate of the TXP 3 amine unit incinerator, and acknowledge the operational use of the flares at the facility. This permit set emission limits in terms of pound per million BTU (lb/MMBtu), pound per hour (lb/hr), and tons per year (TPY) for the TXP 3 regeneration heater for both NO_x and CO emissions. This permit also removed the NMHC (VOC) emission limits from permit MD-215 and MD-243. This permit was amended MD-1001A (4/05/2005) to remove the NO_x and CO emission limits for TXP 1 and TXP 2 amine units (S23 & S24).

Changes in Permit 3-1-016-2

The following information and conditions have been changed in operating permit 3-1-016-2 to add the additional requirements from MD-1001A, and to make the permit consistent with other Chapter 6, Section 3 operating permits being issued by the Division at this time. Permit revisions include:

- The table of contents is updated to reflect the new pagination.
- The source emission points table is updated with the Ch 6, Sec 2 Permit references.
- The Total Facility Estimated Emissions table has been updated to reflect the revised emission estimates.
- Condition F2 (Emission and Operation Limits) has been updated to remove the NMHC emission limits.
- Conditions F3 (Other Fuel Burning Equipments) and F10 (Other Fuel Burning Equipment Monitoring) have been updated to remove the NMHC emission limits, and to revise the NO_x and CO emission limits for the TXP 3 regenerator heater (S30).
- Condition F4 is revised to update the language to that used in permits currently being issued.
- Conditions F9 (Emissions Monitoring), F14 (Maintenance Records) and F18 (Maintenance Reports), have been updated to allow a change in monitoring in accordance with the monitoring guidance document. Reduced monitoring to once measurement per year for NO_x

for the Solar Mars 100-T150000S turbine (S25) is accepted based on historical monitoring for this source.

- Conditions P60-GG3 and P60-GG4 is revised to reflect the most recent requirements of the subpart.
- The Subpart Kb language for Tank 8 is revised to reflect that the tank is no longer subject to the subpart.
- Conditions C1(b)(vi) and (xiii) have been removed as the result of the permit revisions.
- Condition C1(e) and Condition G4, are revised to reflect the new EPA - Region VIII mailing address.
- Conditions G15 Emissions Trading, G19 Open Burning Restrictions, and G21 Unavoidable Equipment Malfunction, are revised to include the updated wording for Chapter 6, Section 3 operating permits being issued by the Division.
- In the State Only Permit Condition, S1, the table is revised to reflect the current standards.
- The Summary of Source mission Limits and Requirements Tables are revised to reflect the various changes to the permit.