

STATEMENT OF BASIS

To: Reviewers

Through: Lori Bocchino, Operating Permit Program Manager

From: Despina Nikolova, Air Quality Engineer

Subject: Draft Operating Permit 3-2-178-1 for Williams Field Services Company
Frewen Lake Compressor Station

Date: December 16, 2013 *Addendum February 19, 2014*

Attached for your review is the draft modification of Wyoming Air Quality Standards and Regulations (WAQSR) Chapter 6, Section 3 operating permit 3-2-178-1 for the Frewen Lake Compressor Station. Permit 3-2-178 was issued August 8, 2012 and is being modified to incorporate new requirements which have become applicable to the Frewen Lake Compressor Station since the issuance of permit 3-2-178.

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 Frewen Lake 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 17, 2013, Williams Field Services Company was notified that the Division intended to reopen operating permit 3-2-178 to add applicable requirements from 40 CFR 60, Subpart OOOO.

Permit MD-13060 (7/20/12) was issued to modify operations at the Frewen Lake Compressor Station with the installation of one 13,301 hp Solar Mars turbine (unit S11). As of December 10, 2013 the permit had not been activated. Therefore, unit S11 is not included in this operating permit modification. Per WAQSR Chapter 6, Section 3(c)(i), the permittee shall apply to modify the operating permit within 12 months after commencing operation of unit S11.

The permit revisions include the following:

- The Table of Contents is revised to include 40 CFR 60, Subpart OOOO to the list of applicable New Source Performance Standards (NSPS).
- The NSPS list is revised to include 40 CFR 60, Subpart OOOO requirements, and to update 40 CFR 60, Subpart JJJJ applicability.
- Condition C1 is revised to include compliance certification requirements for 40 CFR part 60, Subpart OOOO and re-numeration of sub-conditions as appropriate.
- The State Only Permit Conditions table is updated to reflect the current ambient standards, *and language used in permits currently issued by the Air Quality Division.*