# STATEMENT OF BASIS

To: Reviewers

Through: Lori Bocchino, Operating Permit Program Manager

From: Hillary Richard, P.E., Operating Permit Engineer

Subject: Draft Chapter 6, Section 3 Operating Permit 3-3-021-1, Williams Field Services, Saddle Ridge Compressor Station

Date: March 11, 2013 *(Addendum: April 30, 2013) (Addendum: June 21, 2013)*

Attached for your review is the draft modification of Wyoming Air Quality Standards and Regulations (WAQSR) Ch 6, Sec 3 operating permit 3-3-021-1 for the Saddle Ridge Compressor Station. Permit 3-3-021 was issued August 8, 2012. Waiver wv-13356 (6/11/12) acknowledged a previously installed Caterpillar G3412 emergency generator engine and included $NO_X$, CO and VOC emission limits, operating hours limits, and testing and monitoring requirements, but this waiver was superseded by waiver wv-14266. Waiver wv-14266 (3/1/13) includes the following requirements for the Caterpillar G3412 emergency generator engine: $NO_X$ and CO emission limits, initial performance testing and subsequent testing every five years, a maximum of 200 operating hours per year to be monitored with an hour meter, notification and retesting if the engine tests outside the permitted limits, maintaining the engine and monitoring equipment according to good air pollution control practices and compliance with all applicable requirements of 40 CFR 60 Subpart ZZZZ. Waiver wv-14266 corrected (3/5/13) includes all of the requirements and conditions listed in wv-14266 but also corrects the issued date of wv-13356, eliminates language regarding pollution control equipment on the generator engine (as there is none installed), and is consistent with the Division's letter of October 29, 2012 stating initial performance testing on the generator engine must be done within sixty (60) days of waiver issuance. The permittee also requested the Division note that there are several tanks present at the facility, but they have no applicable requirements.

The operating permit revisions include the following:

- Table of Contents: added Additional Requirements section title and page number
- Source Emission Points Table: updated to reference waiver wv-14266 and include the various small storage tanks at the facility (all less than 75 $m^3$ or 472 bbl)
- Total Facility Estimated Emissions: updated to include emissions from the Caterpillar engine
- References throughout the permit have been updated to include waiver wv-14266 (Corrected)
- Condition F1: updated to include the Caterpillar engine in the facility configuration
- Condition F3: updated to include $NO_X$ and CO limits and operating requirements for the Caterpillar engine
- Condition F9: updated to include testing and monitoring requirements for the Caterpillar engine
- Conditions F11, F12 and F13: updated to include recordkeeping (F11), notification (F12) and report (F13) requirements for the Caterpillar engine
- Condition F16: added to include initial performance testing requirements for the Caterpillar engine
- Subpart JJJJ: updated to reflect the status of affected sources currently at the facility
- Subpart DDDDD: removed state requirements that no longer apply

Operating permit revisions (continued):

- Condition C1: updated to include compliance assessment requirements for the Caterpillar engine
- Condition C4: removed and reserved because the compliance schedule items have been completed
- State Only Permit Conditions: updated to be consistent with recent revisions to the state ambient standards
- Summary Table: updated with new requirements for the Caterpillar engine
- Abbreviations: added "bbl" – Barrels

*Addendum: Per comments received from the facility during the public notice period, the following administrative changes were made:*

- *General Information: the name and phone number of the Reporting Official were updated based on the letter sent from the permittee to the Division on December 4, 2012.*
- *Source Emission Points Table: added references to Chapter 6, Section 2 Waiver wv-3392 for Condensate Storage Tanks T1 and T2.*
- *Various grammatical corrections involving references to the Caterpillar G3412 emergency generator engine.*

*Addendum: The facility may have applicable requirements under 40 CFR 60, Subpart OOOO, or may become subject to the standard during the term of the permit. The subpart is added to the NSPS list and condition C1.*