STATE OF WYOMING

MIKE SULLIVAN
GOVERNOR

1890-1990 WYOMING CENTENNIAL A LASTING LEGACY

Department of Environmental Quality

Herschler Building • 122 West 25th Street • Cheyenne, Wyoming 82002

Administration	Air Quality Division	Land Quality Division	Solid Waste Management Program	Water Quality Division
(307) 777-7937	(307) 777-7391	(307) 777-7756 FAX (307) 634-0799	(307) 777-7752	(307) 777-7781 FAX (307) 777-5973

Wyoming Department of Environmental Quality
Air Quality Division
Prevention of Significant Deterioration
NOx Increment Implementation

1) Adoption of NOx PSD Regulations: On September 5, 1990 the Environmental Quality Council adopted the NOx PSD regulations. The regulations were approved by Governor Sullivan, October 27, 1990 and filed with the Secretary of State October 30, 1990. The effective date of the regulations is October 30, 1990. In order to satisfy the requirements of EPA regarding the NOx PSD program, the following review of permits issued since the promulgation of the Federal PSD regulations and the adoption of the State regulations has been undertaken.

2) Determination of Minor Source Baseline Date: A review of the PSD permits issued since February 8, 1988 indicate the following PSD permits were issued by the State of Wyoming. The following table also indicates whether or not NOx increments were considered in the PSD analysis of the source.

Source	Permit No.	Date	NOx Emissions		PSD Increment
			Permit	Total Fac.	Analysis
Sinclair Oil	MD-84	04/06/88	56.5 TPY	1533.0 TPY	no
Energy Intnatl.	CT-789	06/08/88	1327.2	1327.2	no
Coastal Chem.	MD-94	10/18/88	57.9	2215.0	no
Amoco Production	MD-98	03/20/90	226.0	2963.3	yes
Sinclair Oil	CT-831	04/21/89	0.0	1533.0	Not Req.
CharFuels	CT-836	06/26/89	50.4	50.4	yes
FMC Corp.	CT-845	08/15/89	139.5	7812.7	yes
Tenneco Minerals	MD-117	02/28/90	6.6	3466.8	Not Req.
FMC Corp.	MD-120	03/13/90	0.0	7812.7	Not Req.
Questar Pipeline	MD-125	06/18/90	49.1	456.0	yes
General Chemical	MD-129	10/08/90	18.0	Not Calculated	Not Req.

a) Permit MD-84 to Sinclair Oil sets the minor source baseline date for the State. The baseline date is established as the date of the first complete application. The Sinclair Oil application was considered complete as of February 26, 1988 (date on letter advising Sinclair that Division was proposing public notice).

Note: This permit covered a new heater and a heater constructed in 1979 that was never permitted. The allowable NOx emission rate from the sum of the two heaters was 56.5 TPY.

b) Permit CT-789 to Energy International would definitely set the minor source baseline date if there is some argument to concerning the 1979 construction date on the Sinclair heater. The date would be set as April 6, 1988 (date on letter advising Energy International that Division was proposing public notice).

3) Determination of NOx Increment Compliance:

Source	Permit No.	Date	Increment Consumption ug/m3
Sinclair Oil	MD-84	04/06/88	Not analyzed
Energy Intnatl.	CT-789	06/08/88	See footnote below
Coastal Chem.	MD-94	10/18/88	Not analyzed
Amoco Production	MD-98	03/20/90	11.8 ug/m3
Sinclair Oil	CT-831	04/21/89	Not required
CharFuels	CT-836	06/26/89	0.2 ug/m3
FMC Corp.	CT-845	08/15/89	4.7 ug/m3
Tenneco Minerals	MD-117	02/28/90	Not required
FMC Corp.	MD-120	03/13/90	Not required
Questar Pipeline	MD-125	06/18/90	< 1 ug/m3
General Chemical	MD-129	10/08/90	Not required

a) Energy International: Review of the modeling for this permit demonstrates that the facility as permitted would cause an exceedance of the NOx increment. Construction of this project did not begin within the 2 year time frame as required in Section 21, and the Division has notified Energy International that the permit is no longer valid. Copy of letter attached.

b) With the exception of the Sinclair Oil and Coastal Chem permits an analysis has been conducted for significant NOx emissions for each PSD permit issued since the major source baseline date. Reasoned engineering judgment would indicate that the Sinclair Oil and Coastal Chem NOx emissions would not cause an exceedance of the NOx increment.

Therefore, the Division is satisfied that all major emitting facilities, with the exception of Energy International, which have been permitted since the major source baseline date are in compliance with the applicable NOx increment. The Division believes the action regarding the Energy International permit precludes any NOx increment violation.

4) Increment consuming emission inventory tracking system: Attached is a listing of all minor NOx emission sources permitted or waived since the minor source baseline date. The Division will maintain this list and add one additional data field, UTM coordinates of the source. The Division will make this list available to major emitting facilities and major modifications during the permitting process. The applicants will then be responsible for the analysis of the NOx increment consumption by minor sources in the permit application. The listing was developed from a review of the permits and waivers issued by the Division since the minor source baseline date. The list will be updated with all new permitting actions.

It will also be the responsibility of the any PSD permit applicant to address increment consumption from mobile sources and general population growth in the area of significant impact for any new major emitting facility or major modification.

5) Regulatory Language: The Division will commit to apply the definition of "baseline area" as though "minor source" appeared before "baseline date". In fact, this definition was used in the determination of the minor source baseline date discussed in item 2 above. The Division will commit to making the change in the regulations the next time regulation revisions are considered.

6) Legal Authority: The SIP transmittal letter and attachments to James Scherer, documents the legal authority to administer all of the NOx increment provisions of PSD.

7) Conclusion: The Division is confident that permitting actions between February 8, 1988 and the program implementation date of October 30, 1990 have not resulted in any exceedances of the NOx increment. The Division is satisfied that the situation with Energy International over consumption of NOx increment has been resolved because of the fact the permit has expired. The Division is confident that the minor source growth and increment tracking program being developed is satisfactory to adequately protect the NOx increment through future permitting actions.

C. ANY	PERMIT	DATE	NOX_TPY	TTL_TPY
Western Gas Processors	waived	02/18/88	14.40	0.00
Western Gas Processors	CT-779	02/26/88	243.20	243.20
Sinclair Oil Corporation	MD-84	04/06/88	56.47	1575.79
Mountain Fuel Resources	MD-85	04/06/88	35.59	441.88
Stauffer Chemical Co.	waived	04/12/88	8.60	0.00
Western Gas Processors	CT-781	04/14/88	38.30	38.30
Amoco Production Company	CT-786	05/02/88	1.16	1.16
South & Jones Timber Co.	CT-787	05/09/88	9.98	9.98
Louisiana Pacific	CT-791	05/23/88	15.00	15.00
Production Operators	CT-798	06/06/88	115.88	115.88
Terra Resources	waived	06/06/88	38.24	0.00
Energy International, Inc	CT-789	06/08/88	1327.20	1327.20
Lair Petroleum	waived	07/29/88	37.70	37.70
Production Operators,Inc.	waived	07/29/88	3.40	0.00
Production Operators,Inc.	waived	07/29/88	13.50	0.00
Mobil Exploration & Proc.	CT-809	08/19/88	72.64	72.64
Energy Bros. Tech. Inc.	CT-813	09/27/88	90.50	90.50
Phillips Petroleum	MD-93	10/11/88	53.11	159.67
Wycon Chemical Co.	MD-94	10/11/88	57.90	2215.00
Phillips Petroleum Co.	waived	10/11/88	5.26	5.26
Production Operators,Inc.	waived	10/19/88	16.30	131.30
Mining Services Int.	waived	10/27/88	1.71	0.00
Production Operators,Inc.	waived	11/14/88	8.20	8.20
Western Gas Processors	CT-818	11/29/88	208.60	208.60
Amoco Production Company	MD-95	12/20/88	49.67	49.67
Amax Coal Company	CT-821	01/30/89	246.40	246.40
Amoco Production Company	CT-786A	03/01/89	3.02	3.02
Chevron U.S.A., Inc.	waived	03/01/89	12.00	12.00
Western Gas Processors	waived	03/16/89	3.48	41.78
Amoco Production Company	MD-98	03/20/89	226.00	2963.30
Western Gas Processors	waived	03/24/89	4.00	0.00
Western Gas Processors	waived	03/24/89	9.60	0.00
Western Gas Processors	waived	04/06/89	48.30	48.30
Dresser-Rand	MD-99	05/08/89	37.70	282.90
Colorado Interstate	CT-833	05/18/89	43.75	43.75
Western Gas Processors	MD-100	05/18/89	38.60	116.30
Phillips Petroleum Co.	waived	06/13/89	5.26	5.26
Char-Fuels of Wyoming	CT-836	06/26/89	50.40	50.40
Shell Mining	CT-839	07/20/89	86.00	86.00
Phillips Petroleum	CT-840	07/27/89	48.00	48.00
Questar Pipeline Co.	CT-841	07/27/89	60.52	62.49
Oryx Energy Company	waived	08/01/89	1.21	0.00
Northwest Pipeline LaBarg	CT-842	08/14/89	172.20	172.20
Northwest Pipeline Opal	CT-843	08/14/89	25.40	805.80
FMC Wyoming Corp.	CT-845	08/15/89	139.47	139.47
KN Energy	CT-846	08/24/89	58.40	58.40
Kerr-McGee Corporation	waived	08/29/89	17.70	0.00
Lair Petroleum	CT-847	08/30/89	10.60	10.60
MIGC, Inc.	CT-844	08/31/89	96.40	96.40
Western Gas Processors	CT-848	09/05/89	54.50	102.60
Department of Energy	CT-850	09/05/89	44.53	152.69
Presidio Oil Company	waived	09/25/89	6.33	0.00
Coastal Chem	MD-111	10/20/89	0.77	2216.17
Phillips Petroleum Co.	waived	11/02/89	3.50	0.00
FMC Corporation	waived	11/03/89	29.00	0.00
O. Energy	MD-113	11/21/89	48.66	238.94
Colorado Interstate Gas	waived	11/27/89	0.00	31.90
Mobil Coal Producing	CT-854	12/06/89	228.80	228.80
Sinclair Oil Corporation	MD-116	12/11/89	14.22	1590.40

PANY	PERMIT	DATE	NOX_TPY	TTL_TPY
Union Pacific Resources	CT-858	12/19/89	48.24	246.46
Wexpro Company	CT-857	01/17/90	38.79	209.22
Union Pacific Resources	waived	01/22/90	5.00	5.00
Union Pacific Resources	waived	01/22/90	11.00	11.00
Oryx Energy Company	waived	01/24/90	6.83	0.00
Common Energy	waived	02/13/90	10.10	0.00
Western Gas Processors	waived	02/26/90	0.10	0.00
Western Gas Processors	waived	02/26/90	5.52	0.00
Northwest Pipeline Corp.	CT-866	03/04/90	31.82	1163.71
GLG Energy Lightning	CT-869	03/26/90	96.40	96.40
GLG Energy N. Well Draw	CT-870	03/26/90	96.40	96.40
GLG Energy S. Well Draw	CT-871	03/26/90	96.40	96.40
GLG Energy Steinle Ranch	CT-872	03/26/90	67.50	67.50
Department of Energy	CT-874	04/02/90	59.10	211.36
Western Gas Processors	waived	04/19/90	0.00	0.00
Cody Oil	CT-879	04/26/90	24.38	24.38
Western Gas Processors	MD-124	05/14/90	2.00	1666.00
MIGC, Inc.	CT-887	06/11/90	47.90	47.90
Chevron USA	CT-888	06/11/90	57.88	217.59
Questar Pipeline Co.	MD-125	06/18/90	13.67	456.00
Crown Cork and Seal	MD-128	06/18/90	8.00	0.00
Chevron U.S.A., Inc.	waived	06/18/90	12.19	0.00
WYCAL	CT-889	06/25/90	42.40	42.40
Chevron U.S.A., Inc	waived	06/28/90	2.33	0.00
Plains Petroleum Op. Co.	waived	06/28/90	14.00	0.00
uction Operators, Inc	waived	06/28/90	22.20	0.00
tain Fuel Supply Co.	waived	07/18/90	2.60	0.00
on Pacific Resources	waived	08/10/90	6.70	6.70
WYCAL	CT-892	09/06/90	123.60	123.60
Questar Pipeline Co.	CT-893	09/07/90	57.54	57.54
Presidio Pipeline Co.	CT-894	09/26/90	61.32	61.32
Oryx Energy	waived	09/27/90	2.97	143.60
Production Operators	waived	09/27/90	2.90	2.90
General Chemical	MD-129	10/08/90	22.50	Not Calculated
Northwest Pipeline Corp.	CT-897	10/15/90	57.00	57.00
Northwest Pipeline Corp.	waived	10/29/90	0.00	1163.71
Questar Pipeline Co.	waived	11/05/90	4.80	62.30
			5559.31	22960.09