

NOTICE

TO: Wyoming Oil and Gas Producers

FROM: Charles A. Collins, Administrator, Wyoming Air Quality Division

SUBJECT: Rescinding Waiver Thresholds for Production Facilities

DATE: May 22, 1997

This notice is to advise all oil and gas producers and operators that this Division is hereby rescinding any previous guidance and policy with regard to waiving air quality permit requirements for facilities below certain emission thresholds. Under a previous guidance memorandum to oil and gas producers, dated October 23, 1995, the Division stated it would waive permitting requirements for individual facilities based on emission thresholds of criteria/regulated pollutants #50 TPY (tons per year), HAP #5 TPY, total HAP #12.5 TPY. This is no longer applicable and is being rescinded by this notice.

The Division, pursuant to Section 21 of the Wyoming Air Quality Standards and Regulations (WAQS&R), requires all facilities and/or sources to submit a Section 21 permit application and requires the application of best available control technology (BACT) to limit source emissions for which BACT is economically reasonable and technically feasible.

Under the previous guidance memorandum dated October 23, 1995, the Division stated it would waive permitting requirements for certain minor source emissions. This guidance was issued under the authority of Section 21(k) of the WAQS&R, which provides the Administrator of the Division discretion to determine that such minor sources are insignificant in both emission rate and ambient air quality impact. Since issuance of the October 1995 guidance, the prospects of increased natural gas development in Southwest Wyoming and other parts of the state, amounting to hundreds (if not thousands) of new wells, has caused the Division to take another look at its current permit waiver policy. While emissions from a small number of production facilities may still be insignificant by themselves, the prospect of thousands of production facilities emitting at 50 TPY or less is not insignificant.

The Division will continue to work with operators and industry associations in the development of BACT control guidelines for specific production equipment, with initial emphasis on emissions of volatile organic compounds (VOC) from atmospheric storage tanks and glycol dehydrators. The Division currently believes, on the basis of experience gained with natural gas production and control equipment, that control of VOC emissions at 50 TPY or less from individual well production facilities is economically and technically feasible. Questions regarding this policy should be directed to Ty Smith or Bernie Dailey at the Division's Cheyenne office at the address and telephone number listed above for Air Quality.