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west virginia department of environmental protection

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Earl Ray Tomblin, Governor  
Randy C. Huffman, Cabinet Secretary  
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**MEMORANDUM**

**To:** Bev McKeone  
**From:** Jerry Williams   
**Date:** August 5, 2016  
**Subject:** PD16-043, Trans Energy, Inc. (103-00062)

Trans Energy, Inc. submitted PD16-043 on July 20, 2016. PD16-043 was submitted to request a determination for an existing natural gas production facility.

Based on the information submitted with PD16-043, Trans Energy, Inc. did not provide the following required information:

- Attachments B and C indicate there is one (1) gas processing unit present, but Attachment E indicates there are four (4).
- No flashing emissions were included with the storage tank emission calculations. Flashing emissions do occur during this type of operation.
- Attachments B and E state different throughputs for the storage tanks.
- The truck loading emission calculations utilize a 70% control efficiency which is not allowed when making a permit determination submittal.
- Because this facility does not currently have a permit which limits or prescribes the loading, type of loading, or other operational parameters, the potential to emit must be determined on the maximum design capacity. Trans Energy has offered different loading rates with this submittal. The maximum loading rate must be provided. In regards to the saturation factor, since no permit term exists, the maximum saturation factor must be used to determine potential to emit. This would constitute splash loading, which results in an S factor of 1.45. The molecular weight of 18.18 lb/lb-mole provided by Trans Energy is not representative of condensate from this area. Please utilize a molecular weight that is representative of condensate from this area. In regards to the temperature, the highest level of emissions will occur when the temperature is the lowest. Therefore, based on this area, this would occur in January. Trans Energy should assume that the influent is 100% condensate as it would have the highest percentage of VOCs.

Because there was not enough information available, a no decision letter is recommended.