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west virginia department of environmental protection

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Division of Air Quality  
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Charleston, WV 25304  
Phone 304/926-0475 • FAX: 304/926-0479

Earl Ray Tomblin, Governor  
Randy C. Huffman, Cabinet Secretary  
[www.dep.wv.gov](http://www.dep.wv.gov)

August 5, 2016

Leslie A. Gearhart  
Trans Energy, Inc.  
PO Box 393  
St. Marys, WV 26170

Re: Permit Applicability Determination  
Trans Energy, Inc.  
Hart 28H Well Site  
Determination No. PD16-043  
Plant ID No. 103-00062

Dear Ms. Gearhart:

Your Permit Determination Form (PDF) was received by this Division on July 20, 2016 and assigned to the writer for review. Upon initial review of said PDF, it was determined that the PDF as submitted was incomplete. Therefore, no decision can be made based on the following:

1. Attachments B and C indicate there is one (1) gas processing unit present, but Attachment E indicates there are four (4).
2. No flashing emissions were included with the storage tank emission calculations. Flashing emissions do occur during this type of operation.
3. Attachments B and E state different throughputs for the storage tanks.
4. The truck loading emission calculations utilize a 70% control efficiency which is not allowed when making a permit determination submittal.
5. 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.

Please resubmit another PDF when you have collected all pertinent information before the anticipated installation date. Should you have any questions, please contact the undersigned engineer at (304) 926-0499 ext. 1223.

Sincerely,



Jerry Williams, P.E.  
Engineer