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west virginia department of environmental protection

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**MEMORANDUM**

**To:** Beverly McKeone, P.E. – New Source Review Program Manager

**From:** Ed Andrews, Engineer 

**Date:** December 18, 2015

**Subject:** Permit Determination Request for the replacement of Tank V-3050 (PD15-105) for Dominion Transmission, Inc. (103-0009)

On December 14, 2015, Dominion Transmission, Inc. filed Permit Determination Request PD15-105 for the replacement of Tank V-3050 at the Hastings Extraction Plant. The vessel receives produced fluids (drip gasoline) that are collected out of the incoming wet gas in the Slug Catcher located next to Tank V-3050. This proposed new tank will be a pressurized vessel operating between 90 to 110 psig, which equates to 620 to 758 kPa.

Dominion Transmission claims that no emissions would be released from the vessel. This vessel would meet the pressurized vessel exclusion of 60.110b(d)(2) by operating at pressures above 204.9 kPa and therefore would not be subject to the control device requirements of Subpart Kb. Because the vessel would be operating at pressures above 204.9 kPa, this vessel is not a storage vessel under Subpart OOOO to Part 60 in accordance with 40 CFR §60.5430. Therefore, the vessel cannot be subject to storage vessel requirements of §60.5365(e) since it is not a storage vessel.

Areas of concern not addressed by the Permit Determination Request PD15-105 are the applicability of Subpart KKK with regards to the new components associated with replacement of V-3050; would a pneumatic controller be used to regulated the volume in the vessel; would replacement of this vessel increase actual emissions of other emission units at the extraction plant and potentially is trigger PSD review under 45 CSR 14.

The writer unable to make a decision with regards to this tank replacement at the Hastings Slug Catcher Area. Therefore, the writer recommends issuing a no decision letter to Dominion as a response to PD15-105.