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west virginia department of environmental protection

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Earl Ray Tomblin, Governor  
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**MEMORANDUM**

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

**From:** Ed Andrews, Engineer 

**Date:** February 19, 2016

**Subject:** Permit Determination Request for the replacement of Tank V-3050 (PD15-105 & PD16-018) for Dominion Transmission, Inc. (103-00009)

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.

December 18, 2015, this writer identified areas of concern not addressed by the Permit Determination Request PD15-105 and issued an “no decision” letter regarding this determination, which are applicability to either Subpart OOOO or Subpart KKK to Part 60 and would this replacement increase emissions of emission units downstream that would require PSD review under 45 CSR14.

On February 8, 2016, Dominion Resource Services, which represents Dominion Transmission Inc. (DTI), provided additional information regarding the replacement of vessel Tank V-3050. This additional information has been identified as PD16-018.

DTI response to Subpart KKK applicability is that the proposed replacement vessel is not an affected source under Subpart because the replacement activities will occur outside of the not within the applicability dates, which is between January 20, 1984 to August 23, 2011. U.S. EPA

Region III has questioned DTI about not including components located at the Hastings Slug Catch Area under the LDAR program that is required by Subpart KKK for gas processing plants, which was noted in Region III's September 9, 2013 inspection report. To this writer knowledge, this matter as well as other issues that were pointed out in the reference inspection report has not been resolved at this time. Regardless of LDAR applicability at the slug catch area, Subpart KKK has provisions outlining the timing of initiating monitoring newly add components to the LDAR program and therefore these requirements would not be consider substantive requirements which are covered in Permit R13-2468D for the extraction plant at Hastings Complex.

Regarding other source of emissions associated with the vessel (i.e. pneumatic controllers), DTI proposes to use a level indicator and manual block valve to control the drip gasoline in the vessel. Thus, DTI claims there will be no source of emissions from the replacement of the vessel.

Regarding applicability under 45 CSR 14, DTI claims that this change will not result in (1) a significant emission increase of any NSR pollutant and (2) a significant net emission increase of that pollutant, and therefore no review under 45 CSR 14 is required.

Therefore, this writer recommends that a "no permit required" letter under 45 CSR 13 be issued required for the replacement of vessel Tank V-3050 at the Hastings Slug Catch Area