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west virginia department of environmental protection

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Earl Ray Tomblin, Governor  
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**PERMIT DETERMINATION MEMORANDUM**

**To:** Bev McKeone  
**From:** Jerry Williams   
**Date:** July 29, 2015  
**Subject:** PD15-058, Appalachia Midstream Services, L.L.C. (AMS) – Pleasants Compressor Station (051-00128)

**SUMMARY**

AMS submitted PD15-058 on July 27, 2015. PD15-058 was submitted in response to permit condition 2.7.1 which states that upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

On July 30, 2012 AMS submitted a Class II Administrative Update application that contained an error in the permit application regarding the routing of the vapors/overheads from the still columns of the glycol dehydration units. The application stated that both non-condensables from the condenser vent stream and flash tank overhead vapors are routed to the reboiler to be burned and any excess vapors will be routed to the condensate tanks to be controlled by the vapor recovery unit (VRU). This was not accurate as according to AMS the excess vapors from only the flash tank overhead stream are sent to be controlled by the VRU. Non-condensables from the condenser vent stream are controlled only by the reboiler with no secondary control by the VRU.

Emissions from the still vent were modeled using a more conservative control, therefore, there is no emissions increase associated with the information provided by AMS. Furthermore, the current permit (R13-2829D) issued on October 10, 2014 contains the correct permit term in regards to routing the vapors/overheads (Permit Condition 6.1.7.a).

It is my opinion that a permit is not required for this notification that is required under permit condition 2.7.1 as there will be no increase in emissions; or, trigger a substantive requirement of any State or Federal air quality regulation. Additionally, no permit terms change as a result of this notification.