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west virginia department of environmental protection

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Division of Air Quality  
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Earl Ray Tomblin, Governor  
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**MEMORANDUM**

To: Bev McKeone, NSR Program Manager

From: Caraline Griffith, Engineer Trainee

Date: June 1, 2015

Subject: Administrative Update, R13-3060A, Stone Energy Corporation

On May 14, 2015 the DAQ received an administrative update request for Stone Energy Corporation to make changes to Permit R13-3060A. Attached to this memo are the requested changes (identified by the red tabs), permit cover letter, completed database sheet, updated Permit R13-3060A, and a copy of the mark-up submitted by the applicant.

Based on 45CSR13 “Class I Administrative Updates” are limited to changes including typographical errors, changes in a permit condition to incorporate any new more stringent requirements related to an applicable rule promulgated after the existing permit was issued and that do not result in a physical change in or change in method of the operation of the source, and permanent removal of equipment, not including air equipment which is what is occurring in this permit registration. Therefore, a Class I Administrative Update is needed and it is recommended for approval.

However, all of the changes requested by the applicant were not completed because they were either direct citations from 40CFR60 or could potentially be relevant to the applicant now or in the future. Some inclusions and updates were considered and made that were deemed relevant regarding the cover and closed vent system on Storage Tank (9E). Parts of 40CFR60, NSPS Subpart OOOO were included and cited. Attached is a full list of what was suggested and the action taken.

Suggestion

Table 1.0: All SCR (Selective Catalytic Reduction) notations were suggested to be changed to OC (Oxidation Catalysts).

Action

The change was made. After reviewing the original permit application from 2013 it was determined that each control device for the Caterpillar combustion engines, excluding the backup generator, was indeed an oxidation catalyst, specifically catalytic converters.

Suggestion

Table 1.0: Caterpillar 3516B RICE was determined to not yet be installed and was suggested to be noted on the permit as well as the installation year changed from 2013 to 20XX.

Action

The year was left out of the final table completely.

Suggestion

Table 1.0: It was suggested for the Year Installed of the Caterpillar 3412 NG Primary Generator (GE-1) and the Caterpillar 3516B RICE (CE-2) to change the installation year from 2013 to 2014.

Action

These changes were made because upon further inspection and testimony from the contact, Jesse Hanshaw, the engines were not installed until after the permit issuance in 2013.

Suggestion

Table 1.0: It was suggested that the control device for the Condensate and Water Storage Tanks be noted as an Electric VRU.

Action

The change was made because the control device is an electric VRU instead of the originally permitted natural gas engine.

Suggestion

Table 1.0: It was suggested that CE-5 Caterpillar 3406 RICE be stricken from the permit because it was never installed and does not plan to be installed.

Action

The CE-5 was stricken from the permit.

Suggestion

Table 1.1: All occurrences of SCR were suggested to be changed to OC.

Action

These changes were made because, as mentioned above, the control devices are oxidation catalysts.

Suggestion

Table 1.1: The control device for the Condensate and Water Storage Tanks was suggested to be changed to CE-5 Electric Vapor Recovery Unit (VRU) from 5E Vapor Recovery Unit (VRU).

Action

The changes were made because the control device identifier is CE-5 and the VRU is an electric VRU.



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Suggestion

Section 5.1: All instances of SCR were suggested to be changed to Oxidation Catalyst (OC).

Action

Changes were made because each control device of the Engines 1E-4E and 6E-7E are oxidation catalysts.

Suggestion

Sections 5.1.1, 5.1.3, 5.1.5, 5.1.6, 5.1.7, 5.1.9: It was suggested that these sections be removed from the permit.

Action

Sections 5.1.5 and 5.1.6 were stricken from the permit because they pertained to the Caterpillar 3406 which was never installed and therefore stricken from the permit.

Sections 5.1.1, 5.1.3, 5.1.7, and 5.1.9 were retained because they are required to show compliance with sections 5.1.2, 5.1.4, 5.1.8, and 5.1.10.

Suggestion

Section 5.4 Recordkeeping Requirements, Line 2: The phrase “amount and type of fuel consumed in each engine and the” was suggested to be stricken from the permit.

Action

This phrase was kept because it was deemed part of the language of the regulations and permit and required for context.

Suggestion:

Section 6.1.15: This section was suggested to be stricken from the permit because it was suggested that this language does not pertain to this facility.

Action

Because this language is taken straight from the CFRs and could potentially now or in the future pertain to this facility, it was kept.

Suggestion:

Section 6.2.4 - 6.2.13 and Section 6.3: These sections were suggested to be stricken from the permit because it was suggested that this language does not pertain to this facility.

Action

Because this language is taken straight from the CFRs and could potentially now or in the future pertain to this facility and because it has pertinent Recordkeeping and Test Method requirements, it was kept.



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Suggestion

Section 7.1.2-7.1.5: It was suggested that these sections be removed from the permit because they do not pertain to the facility.

Action

These sections were kept because they are cited directly from the CFRs and because they could now or in the future pertain to the facility.

Suggestion

Section 7.2: It was suggested that this entire section be removed from the permit because it does not pertain to the facility.

Action

This section was kept because it is cited directly from the CFRs and because it could now or in the future pertain to the facility.

Suggestion

Section 7.3.1-7.3.4 and 7.3.6: It was suggested that these sections be removed from the permit because they do not pertain to the facility.

Action

These sections were kept because they are cited directly from the CFRs and because they could now or in the future pertain to the facility.

Suggestion

Section 7.4.3: It was suggested that this section be removed from the permit because it does not pertain to the facility.

Action

This section was kept because it is cited directly from the CFRs and because it could now or in the future pertain to the facility.

Suggestion

Section 8.0, title line: Suggested to strike the words "Pneumatic Controllers."

Action

Because this section specifically refers to Reciprocating Compressor Engines, Pneumatic Controllers and references 40CFR60 Subpart OOOO this title cannot be stricken.



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Suggestion

Section 8.1.2: It was suggested that this entire section be removed from the permit because it does not pertain to the facility.

Action

This section was kept because it is cited directly from the CFRs and because it could now or in the future pertain to the facility.

Suggestion

Section 8.2.2 (1-4), 8.3.2, 8.3.3: It was suggested that these sections be removed from the permit because they do not pertain to the facility.

Action

These sections were kept because they are cited directly from the CFRs and because they could now or in the future pertain to the facility.

Suggestion

Section 8.4.2, Line 3: It was suggested that the amount of days the initial report is due after the initial compliance period has ended should be changed from 30 to 90.

Action

This change was made. Upon reviewing the CFR that this piece of information was derived from, 60.5410, it was discovered that the correct time allotted is 90 days.

Suggestion

Section 8.4.3, Section 2: It was suggested that this section be removed from the permit because it does not pertain to the facility.

Action

This section was kept because it is cited directly from the CFRs and because it could now or in the future pertain to the facility.

Suggestion

Sections 9.1.3 and 9.1.6: It was suggested that these sections be removed from the permit.

Action

Sections 9.1.3 and 9.1.6 were retained because they are required to show compliance with sections 9.1.2 and 9.1.5.



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Suggestion

Section 9.2, Monitoring Requirements: It was suggested that this entire section be removed from the permit because it does not pertain to the facility.

Action

This section was kept because it is cited directly from the CFRs and because it could now or in the future pertain to the facility.

Suggestion

Section 9.4, Recordkeeping Requirements: It was suggested that this section be removed from the permit because it does not pertain to the facility.

Action

This section was kept because it is cited directly from the CFRs and because it could now or in the future pertain to the facility.

Suggestion

Section 10.1.3( c ): It was suggested that the phrase “into the flame zone” be changed to “with the primary fuel for the reboiler.”

Action

This change was not made because the permitting language of these limitations are the same for all applicable permits.

Suggestion

Section 10.3.2, Recordkeeping Requirements: It was suggested that this section be removed from the permit because it does not pertain to the facility.

Action

This section was kept because it is cited directly from the CFRs and because it could now or in the future pertain to the facility.

Suggestion

Section 11.1.1: It was suggested that the phrase “electrically driven” be placed in front of “vapor recovery unit” and that (5E) be changed to (CE-5). It was also suggested that the phrase “prior to release to the atmosphere” be stricken in this section.

Action

The phrase “electrically driven” was added because the VRU is electrically driven. (5E) was changed to (CE-5) because that is the new identifier. The phrase “prior to release to the atmosphere” was kept because this permitting language cannot be changed in part.



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Suggestion

Section 11.2.1, Line 2: The phrase “in accordance with 40CFR60.5416( c )” was suggested to be added after the phrase “storage tanks (9E). The remainder of this section was suggested to be stricken from the permit.

Action

The phrase “in accordance with 40CFR60.5416( c )” was added because this section in the CFRs pertains to the Electric VRU. The rest of the section was kept, but altered to reflect the updated and relevant CFR subsections.

60.482-10 refers to Subpart VV - Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction or Modification Commenced After January 5, 1981, and on or Before November 7, 2006, Standards: Closed Vent Control Systems and Control Devices. This facility was constructed in 2013, thus these standards do not apply to this facility. Furthermore, this facility is a natural gas compressor station. 40CFR60.5416, which refers to Subpart OOOO - Standards of Performance for Crude Oil and Natural Gas Production, Transmission, and Distribution, What are the initial and continuous cover and closed vent system inspection and monitoring requirements for my storage vessel, centrifugal compressor and reciprocating compressor affected facilities?, is more pertinent to this permit and facility.

40CFR60.5416( c ) was added to Section 11.0 under new subsection 11.2: Monitoring Requirements and cited directly from 40CFR60.

Suggestion

Section 11.3, Recordkeeping Requirements: It was suggested that this entire section be redacted from the permit because it does not relate to the facility.

Action

This section was kept because Recordkeeping Requirements are required for this permit and facility.

Suggestion

Section 11.4, Reporting Requirements: It was suggested that this entire section be redacted from the permit because it does not relate to the facility.

Action

This section was kept because Reporting Requirements are required for this permit and facility.