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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  
Randy C. Huffman, Cabinet Secretary  
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**MEMORANDUM**

**To:** Beverly McKeone  
**From:** William T. Rothwell II  
**Date:** November 13, 2015  
**Subject:** West Virginia Oil Gathering, LLC – Stockley Station– Clay County, WV  
**ID #:** 015-00017  
**APP #:** PD15-084

**BACKGROUND INFORMATION:**

West Virginia Oil Gathering, LLC submitted a permit determination for a 138,600 gallon petroleum crude oil tank due to odor complaint. The complaint stated that vapors were observed from the storage tank vents during tanker truck unloading. After review of the applicants submittal, the tank (equipped with an internal roof) contains a petroleum crude oil solution with a maximum true vapor pressure of 13.9 psi. The potential emissions are as follows:

<u>Pollutant</u>	<u>Hourly PTE</u>	<u>Yearly PTE</u>
PM	0.32	2.21
PM10	0.09	0.60
VOC	2.09	9.15
HAPs	0.10	0.44

**RECOMMENDATION:**

Although the emission rates are below the emission limits of six (6) lb/hr and ten (10) TPY; 2 lb/hr, or 5 TPY of HAPs set forth set forth in 45CSR13 - 2.17.a&b., the above tank is subject to a substantive requirement of a federal regulation, namely 40CFR60 subpart Kb, §60.112b(b)(2) in which in order to comply, the applicant must install a closed vent system and a control device. Therefore, a permit is required by this Division for the petroleum crude oil tank at the facility.

William T. Rothwell II, P.E.  
Engineer

11/13/2015

Date