



west virginia department of environmental protection

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PERMIT DETERMINATION MEMORANDUM

To: Bev McKeone
From: Jerry Williams
Date: September 18, 2015
Subject: PD15-081, Triad Hunter LLC (Triad) – Stewart Winland Production Facility (095-00042)

SUMMARY

Triad submitted PD15-081 on September 10, 2015. PD15-081 was submitted to remove the condensate tower from the facility. Triad has determined that very little additional gas is removed from the condensate in the condensate tower. Therefore, Triad intends to remove the condensate tower. The small amount of gas that was removed in this vessel and routed to the vapor recovery unit (VRU) will now be released from the condensate while in the condensate storage tank. As vapors from both the condensate tower and the condensate storage tanks both went to the VRU, the VRU will see no change in vapors it received as a result of the condensate tower removal. No change in potential emissions will be realized as a result of this removal.

There is no direct reference to the condensate tower in the current permit (R13-3214). Permit requirement 8.8.1 states:

The permittee shall route all VOC and HAP vapors from the Storage Tanks (T01 – T10), from the Tank Truck Loading Area (TT Load), from the Dehydration Unit Flash Tank (RSV-1), and from the other process equipment identified in the permit application to the Vapor Recovering Unit (VRU) or the Vapor Combustor Units (VCU-1 thru VCU-4) prior to release to the atmosphere when the vapor recovery unit (VRU) is shut down. The Dehydration Unit Still Vent vapors shall be routed to the Vapor Combustor Units (VCU-1 thru VCU-4) prior to release to the atmosphere.

The term “other process equipment identified in the permit application” would insinuate the condensate tower that is the subject of this permit determination. However, it is my opinion that a permit is not required for this removal because there is no increase in emissions and no substantive requirement of any State or Federal air quality regulation is triggered.