



west virginia department of environmental protection

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Earl Ray Tomblin, Governor
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MEMORANDUM

To: Bev McKeone
From: Jerry Williams *gw*
Date: September 23, 2016
Subject: PD16-055, Trans Energy, Inc. (103-00062) Hart 28 Well Site

Trans Energy, Inc. submitted PD16-055 on September 12, 2016. PD16-055 was submitted to request a determination for an existing natural gas production facility. Trans Energy submitted PD16-043 on July 20, 2016, however, a decision was made that there was not enough information necessary to make a decision.

The equipment located at the Hart 28H Well Site includes one (1) 0.75 MMBTU/hr gas processing unit (GPU), two (2) 210 barrel storage tanks, and truck loading. The storage tanks are used for natural gas liquids and separated water. The emission estimation was done as if both were condensate storage tanks. The emission estimation was done using EPA AP-42 for the GPU and truck loading. The storage tanks were estimated using EPA Tanks 4.09 for working and breathing losses and E&P Tanks for flashing losses.

Emissions from this facility were calculated by Trans Energy and the total facility PTE for the Hart 28 Well Site is shown in the following table:

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (tons/year)
Nitrogen Oxides	0.07	0.32
Carbon Monoxide	0.06	0.27
Volatile Organic Compounds	3.71	5.22
Particulate Matter-10/2.5	>0.01	0.024
Sulfur Dioxide	>0.01	>0.01
Formaldehyde	>0.01	>0.01

45CSR13 Section 2.24 defines a "Stationary source" as any building, structure, facility, installation, or emission unit or combination thereof, excluding any emissions unit which meets or falls below the criteria delineated in Table 45-13B, which:

- Is subject to any substantive requirement of an emission control rule promulgated by the Secretary.
- Discharges or has the potential to discharge more than six (6) pounds per hour and ten (10) tons per year, or has the potential to discharge more than 144 pounds per calendar day, of any regulated air pollutant.
- Discharges or has the potential to discharge more than two (2) pounds per hour or five (5) tons per year of hazardous air pollutants considered on an aggregated basis.
- Discharges or has the potential to discharge any air pollutant(s) listed in Table 45-13A in the amounts shown in Table 45-13A or greater.
- An owner or operator voluntarily chooses to be subject to a construction or modification permit pursuant to this rule, even though not otherwise required to do so.

In conclusion, a permit is not required for the proposed facility based upon the submitted permit determination which indicates that the proposed facility is below the emission thresholds and does not trigger a substantive requirement of any State or Federal air quality regulation.