

STATEMENT OF BASIS
TRANSCONTINENTAL GAS PIPE LINE COMPANY, LLC
COMPRESSOR STATION 95
MARION JUNCTION, DALLAS COUNTY, ALABAMA
FACILITY/PERMIT NO. 104-0031

This proposed Title V Major Source Operating Permit (MSOP) renewal has been developed in accordance with the provisions of ADEM Admin. Code chap. 335-3-16. The above-named applicant has requested authorization to perform the work or operate the facility shown on the application and drawings, plans, and other documents attached hereto or on file with the Air Division of the Alabama Department of Environmental Management, in accordance with the terms and conditions of this permit.

Transcontinental Gas Pipe Line Company, LLC (Transco) Compressor Station 95 was originally constructed/began operations in 2012. The initial MSOP was issued on July 21, 2015 and this is the second renewal of the MSOP. The current MSOP was issued on August 13, 2020, became effective on August 13, 2020, and is scheduled to expire on July 20, 2025. Per ADEM Admin Code r. 335-3-16-.12(2), an application for permit renewal shall be submitted at least six (6) months, but not more than eighteen (18) months, before the date of expiration of the permit. Based on this rule, the application for renewal was due to the Department no later than January 20, 2025, but no earlier than January 20, 2024. An application for this permit renewal was received by the Department on January 15, 2025, and deemed complete on January 15, 2025.

The facility is located in Dallas County, which is currently listed as unclassifiable/attainment with all National Ambient Air Quality Standards (NAAQS).

There are no current or ongoing enforcement actions against Transco necessitating additional requirements to achieve compliance with the proposed permit conditions. The enforcement and compliance history for the facility can be found at <https://echo.epa.gov/> (Search using Facility ID AL0000000104700031).

Facility Operations

Transcontinental Gas Pipe Line Company, LLC (Transco) operates a compressor station for the transmission of pipeline natural gas (SIC 4922) located in Marion Junction, Dallas County. Natural gas enters the facility and compressors boost the pressure of the gas for transmission in the pipeline downstream of the facility. The gas compressors are driven by stationary natural gas-fired turbines. All yard piping, including the pigging and filtering equipment, and most of the other equipment in natural gas service (e.g. compressors, engine fuel gas systems, and gas meters) must be depressurized (blown down) during maintenance. Most venting activities are intermittent and only performed during scheduled maintenance activities and upset/emergency situations. Significant sources of air pollutants at this facility include:

Emission Unit Nos. 001 - 002: Two (2) 17,239 hp Solar Mars 100-T16000S Natural Gas-fired Combustion Turbines Equipped with Dry Low NO_x Combustors (Mainline Unit Nos. 1 – 2)

Emission Unit No. 003: One (1) 1,060 hp Dresser-Waukesha P48GL 4-stroke, Lean Burn (4SLB) Natural Gas-fired Emergency Reciprocating Engine (Auxiliary Unit No. 1)

Emission Unit No. 004: One (1) 16,865 hp Solar Mars 100-T16000S Natural Gas-Fired Combustion Turbine Equipped with Dry Low NO_x Combustor (Mainline Unit No. 3)

Emission Unit No. 005: One (1) 17,415 hp Solar Mars 100-T16000S Natural Gas-fired Combustion Turbine Equipped with Dry Low NO_x Combustor (Mainline Unit No. 4)

Insignificant emission sources at this facility include storage tanks for used oil and condensate liquids, pipeline blowdowns, degreasers, and pigging activities.

Proposed Changes

There have been no modifications to or additions of significant emission sources at this facility since the issuance of the first renewal MSOP.

Permit History

The following is a history of previously issued permits for this facility:

Issuance No./Permit No.	Limit(s) Established	Issuance Date	Effective Date	Expiration Date	Amendments/ Modifications
AP ¹ X001 – X002 - MLU 1 and 2 - (new)	--	January 19, 2011	--	--	--
AP X003 – AUX 1 - (new) – never constructed – permit void	--	January 19, 2011	--	--	--
AP X004 – AUX 1 - (new)	500 hr/yr operational limit to allow for future expansion	February 5, 2013	--	--	--
Initial Title V MSOP	--	July 21, 2015	July 21, 2015	July 20, 2020	Significant Modification - July 3, 2018 - Incorporate Air Permit No. X005 for MLU 3
AP X005 – MLU 3 - (new)	--	September 10, 2015	--	--	--
AP X006 – AUX 2 - (new) – never constructed – permit void	--	September 10, 2015	--	--	--
AP X007 – MLU 4 - (new)	--	August 28, 2018	--	--	--
AP X008 – AUX 2 - (new) – never constructed – permit void	--	August 28, 2018	--	--	--
1 st Title V MSOP Renewal	--	August 13, 2020	August 13, 2020	July 20, 2025	--

¹AP = Air Permit

Plant-Wide Potential to Emit (PTE)

Pollutant	PTE (TPY)
PM/PM ₁₀ /PM _{2.5}	16.38
NO _x	179.06
CO	205.97
SO ₂	8.40
VOC	21.09
Total HAP	2.94
CO _{2e}	287,827.00

Applicability: Federal Regulations

Title V

This facility is a major source under Title V regulations because the potential emissions for nitrogen oxides (NO_x) and carbon monoxide (CO) each exceed the 100 TPY major source threshold. It is not a major source of Hazardous Air Pollutants (HAP) because individual HAP potential emissions do not exceed 10 TPY, and the total HAP potential emissions do not exceed 25 TPY.

Prevention of Significant Deterioration (PSD)

This facility is located in an attainment area for all criteria pollutants. The facility operations are not one of the 28 major source categories; therefore, the applicable major source threshold is 250 TPY for criteria pollutants. The facility-wide potential emissions are below 250 TPY for each regulated criteria pollutant. Therefore, this facility is considered a minor source under PSD regulations. Auxiliary Unit No. 1 was installed in 2013, and the facility requested that the emergency engine be limited to 500 hours of operation during any 12-month period in order to accommodate for emissions from potential future construction projects. The operating limitation for the emergency engine is not necessary for the facility to be considered a minor source under PSD.

New Source Performance Standards (NSPS)

40 CFR Part 60, Subpart GG, Standards of Performance for Stationary Gas Turbines (Subpart GG)
[Adopted by reference in ADEM Admin. Code r. 335-3-10-.02(33)]

Mainline Unit Nos. 1 through 4 were manufactured after the Subpart GG, applicability dates of October 3, 1977, through February 18, 2005 (2011, 2011, 2016, and 2018, respectively); therefore, they are not subject to this Subpart. They are subject to 40 CFR Part 60, Subpart KKKK.

40 CFR Part 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (Subpart JJJJ) [Adopted by reference in ADEM Admin. Code r. 335-3-10-.02(88)]

In accordance with 40 CFR §60.4230(a)(4)(iv), Auxiliary Unit No. 1 is subject to Subpart JJJJ since construction commenced (date ordered) after June 12, 2006, and was manufactured after January 1, 2009, the applicability dates for this Subpart. It is classified as an emergency 4-stroke, lean burn (4SLB) spark ignition (SI) internal combustion engine (ICE) greater than or equal to 130 hp.

Emission Limitations

Subpart JJJJ regulates emissions of NO_x, CO, and volatile organic compounds (VOC). In accordance with 40 CFR §60.4233(e) and Table 1 to Subpart JJJJ, Auxiliary Unit No. 1 is subject to a NO_x emission limit of 2.0 g/hp-hr or 160 ppmvd at 15% O₂, a CO emission limit of 4.0 g/hp-hr or 540 ppmvd at 15% O₂, and a VOC emission limit of 1.0 g/hp-hr or 86 ppmvd at 15% O₂. According to 40 CFR §60.4234, Transco must operate and maintain the emergency engine in a manner that meets these emission standards over the entire life of the engine.

Compliance Requirements

Transco demonstrates compliance with the NO_x, CO, and VOC emission limits through performance testing (see *Testing Requirements* section below). According to 40 CFR §60.4243(b)(2)(ii), because the engine is not certified, Transco must keep a maintenance plan, records of maintenance conducted on the emergency engine, and, to the extent practicable, must maintain and operate the emergency engine in a manner consistent with good air pollution control practices for minimizing emissions.

40 CFR §60.4243(d) states Transco is limited to operating the emergency engine for the purpose of maintenance checks and readiness testing no longer than 100 hours per year. Transco may operate the emergency engine up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year is prohibited.

40 CFR §60.4243(e) states owners and operators of stationary SI natural gas-fired engines may operate the engines using propane for a maximum of 100 hours per year as an alternative fuel solely during emergency operations, but must keep records of such use. If propane is used for more than 100 hours per year in an engine that is not certified to the emission standards when using propane, the owners and operators are required to conduct a performance test to demonstrate compliance with the emission standards of 40 CFR §60.4233.

Auxiliary Unit No. 1 is equipped with a non-resettable hour meter as required by 40 CFR §60.4237(a).

Testing Requirements

This emergency engine is non-certified so in accordance with 40 CFR §60.4243(b)(2)(ii), Transco is required to conduct an initial performance test for NO_x, CO, and VOC within 180 days of startup while operating within 10% of 100% peak load and subsequent performance tests every 8,760 hours of operation or every three years, whichever comes first. Performance test requirements are outlined in 40 CFR §60.4244. The most recent performance test for this emergency engine was conducted on July 19, 2023, which demonstrated compliance with each of the applicable standards.

Notification, Reports, and Records

40 CFR §60.4245(a)(1) requires that owners and operators of all stationary SI ICE that are subject to this Subpart keep records of all notifications submitted and all documentation supporting any notification. In addition, 40 CFR §60.4245(a)(2) requires Transco to maintain records of all maintenance conducted on the engine. 40 CFR §60.4245(b) requires that owners and operators of stationary SI emergency ICE greater than 500 hp manufactured on or after July 1, 2010, that do not meet the standards applicable to non-emergency engines keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. 40 CFR §60.8(d) requires Transco to notify the Air Division at least 30 days prior to conducting any performance test. In addition, 40 CFR §60.4245(d) requires that a copy of all performance tests be submitted within 60 days after the test has been completed. This facility operates under a Title V MSOP; therefore, all records required under this Subpart must be retained for at least five years from the date of generation of each record and be readily available for inspection upon request.

40 CFR Part 60, Subpart KKKK, Standards of Performance for Stationary Combustion Turbines (Subpart KKKK) [Adopted by reference in ADEM Admin. Code r. 335-3-10-.02(89)]

Mainline Unit Nos. 1-4 each has a heat input at peak load greater than 10 MMBtu/hr and were each manufactured after the February 18, 2005, applicability date for this standard; therefore, they are each subject to this Subpart. They are each classified as a new turbine firing natural gas with a heat input at peak load greater than 50 MMBtu/hr and less than or equal to 850 MMBtu/hr.

Emission Limitations

Subpart KKKK regulates emissions of NO_x and SO₂. In accordance with 40 CFR §60.4320(a) and Table 1 to Subpart KKKK, each turbine is subject to a NO_x emission limit of 25 ppmvd at 15% O₂ on a dry basis or 150 ng/J of useful output (1.2 lb/MWh). Transco has elected to comply with the NO_x emission limit of 25 ppm at 15% O₂ on a dry basis. In accordance with 40 CFR §60.4330(a), Transco is subject to an SO₂ emission limit in which each turbine may not burn any fuel which contains total potential SO₂ emissions in excess of 26 ng SO₂/J (0.060 lb SO₂/MMBtu) heat input, or discharge into the atmosphere any gases which contain SO₂ in excess of 0.90 lb/MWh (110 ng/J) gross output. Transco has elected to comply with the SO₂ emission limit in which each turbine may not burn any fuel which contains total potential SO₂ emissions in excess of 26 ng SO₂/J (0.060 lb SO₂/MMBtu) heat input. Transco complies with the SO₂ emission standard by burning fuel with a total sulfur content less than 1.0 gr/scf (0.003 lb SO₂/MMBtu).

Compliance Requirements

Transco demonstrates compliance with the NO_x emission limit through performance testing (see *Testing Requirements* section below). 40 CFR §60.4365(a) exempts Transco from monitoring the total sulfur content of fuel by demonstrating that the fuel does not exceed potential sulfur emissions of 26 ng SO₂/J (0.060 lb SO₂/MMBtu) heat input. The required demonstration is made by maintaining fuel quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the fuel, specifying that the maximum total sulfur content for the natural gas is 20 grains of sulfur or less per 100 standard cubic feet.

Testing Requirements

40 CFR §60.4400 requires an initial performance test within 60 days of achieving the maximum production rate, but not later than 180 days after initial startup as required by 40 CFR §60.8(a). In accordance with 40 CFR §60.4400(a), subsequent NO_x performance tests are required on an annual basis with no more than 14 calendar months following the previous performance test. 40 CFR §60.4340(a) states that if NO_x emission results from the performance test are less than or equal to 75% of the NO_x emission limit, the frequency of subsequent performance tests may be reduced to once every two years with no more than 26 calendar months following the previous performance test. If the results of any subsequent performance test exceed 75% of the NO_x emission limit, then annual performance testing must resume. The most recent performance testing was conducted on October 29, 2024, for Mainline Unit No. 1, on July 15, 2024, for Mainline Unit No. 2, and on July 16, 2024, for Mainline Unit Nos. 3 and 4, which demonstrated compliance with the applicable NO_x standard.

Notification, Reports, and Records

40 CFR §60.8(d) requires Transco to notify the Air Division at least 30 days prior to conducting any performance test. 40 CFR §60.4375(b) requires Transco to submit a written test report within 60 days of completing the performance test. 40 CFR §60.4375(a) states for each affected unit required to continuously monitor parameters or emissions, or to periodically determine the fuel sulfur content under this Subpart, Transco must submit reports of excess emissions and monitor downtime, in accordance with 40 CFR §60.7(c). Excess emissions must be reported for all periods of unit operation, including start-up, shutdown, and malfunction.

40 CFR Part 60, Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification, or Reconstruction Commenced After August 23, 2011, and on or Before September 18, 2015 (Subpart OOOO) [Adopted by reference in ADEM Admin. Code r. 335-3-10-.02(91)]

The compressors associated with Mainline Unit Nos. 1 and 2 were installed prior to the August 23, 2011, applicability of this regulation; therefore, these units are not subject to this Subpart. The compressors associated with Mainline Unit Nos. 3 and 4 commenced construction after the August 23, 2011, and before the September 18, 2015, applicability dates of this regulation; therefore, these units are potential affected sources under this Subpart. However, because the centrifugal compressors do not employ wet seals and are not located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment, this facility is not subject to this Subpart.

40 CFR Part 60, Subpart OOOOa, Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced After September 18, 2015 and On or Before December 6, 2022 (Subpart OOOOa) [Adopted by reference in ADEM Admin. Code r. 335-3-10-.02(91)(a)]

The compressor associated with Mainline Unit No. 4 commenced construction after the September 18, 2015, and before the December 6, 2022, applicability dates of this regulation; therefore, Mainline Unit No. 4 is subject to this Subpart. According to 40 CFR §§60.5365a(d)(1) and (j), the turbine is subject to the pneumatic controller and fugitive equipment components requirements of this Subpart. The turbine is not subject to the requirements for a centrifugal compressor affected facility because

it is equipped with dry gas seals rather than wet gas seals. 40 CFR §60.5370a states Transco must be in compliance with the standards of this Subpart upon startup of the turbine and must, at all times, maintain and operate the affected facility in a manner consistent with good air pollution control practices for minimizing emissions.

Transco is required to comply with the GHG and VOC standards that apply to pneumatic controller affected facilities in 40 CFR §§60.5390a(c)(1) and (2). Transco complies with this standard by using pneumatic supply gas controllers with a bleed rate less than or equal to 6 standard cubic feet per hour. According to 40 CFR §60.5390a(d), initial compliance with this standard must be demonstrated according to the requirements of 40 CFR §60.5410a(d)(3), which states that the controller manufacturer's design specifications must indicate the controller emits less than or equal to 6 cubic feet of gas per hour. 40 CFR §60.5410a(d)(4) states each new pneumatic controller affected facility must be tagged according to the requirements of 40 CFR §§60.5390a(b)(2) or (c)(2). 40 CFR §60.5410a(d)(5) requires Transco to submit an annual report for the affected controller facilities according to the requirements of 40 CFR §§60.5420a(b)(1) and (5). 40 CFR §60.5410a(d)(6) requires records to be maintained as specified in 40 CFR §60.5420a(c)(4) for each pneumatic controller affected facility.

Initial and continuous compliance with the fugitive equipment components requirements are outlined in 40 CFR §60.5410a(j) and 40 CFR §60.5415a(h), respectively. Transco must develop a fugitive emissions monitoring plan as required in 40 CFR §§60.5397a(b), (c), and (d). Transco is also required to conduct an initial monitoring survey as required in 40 CFR §60.5397a(f)(2) and periodic monitoring surveys as required in 40 CFR §60.5397a(g). Transco must maintain records as specified in 40 CFR §60.5420a(c)(15), must repair each identified source of fugitive emissions for each affected facility as required in 40 CFR §60.5397a(h), and must submit an annual report for each collection of fugitive emissions components as required in 40 CFR §§60.5420a(b)(1) and (7).

In accordance with 40 CFR §60.5410a(j)(5), the initial annual report is due no later than 90 days after the end of the initial compliance period as required in 40 CFR §60.5420a(b). This date is established upon the initial startup date and issuance of the Temporary Authorization to Operate (TAO). Transco was issued TAO for Mainline Unit No. 4 on October 28, 2019; therefore, the initial annual report was due no later than January 26, 2021. This report was received on February 17, 2021. Due to the August 2020 amendments to the rule that removed the transmission sector from the Subpart, and the restoration of NSPS applicability of the transmission sector by congressional vote on June 30, 2021, the Air Division made the decision to readjust the compliance period based on a calendar year (January 1 – December 31); therefore, subsequent annual reports are due no later than April 1st each year. Transco may submit one report for multiple affected facilities provided the report contains all of the information required as specified in paragraphs (b)(1) through (8) of section 40 CFR §60.5420a(b), except as provided in paragraph (b)(13) of this section. In accordance with 40 CFR §60.5420a(b)(11), Transco must submit all reports to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA's CDX system (<https://cdx.epa.gov/>). Annual reports may coincide with Title V reports as long as all the required elements of the annual report are included.

Records required by this Subpart are outlined in 40 CFR §§60.5420a(c)(4) and (15). Records must be maintained either onsite or at the nearest local field office for at least five years. Any records

required to be maintained by this Subpart that are submitted electronically via the EPA's CDX system may be maintained in electronic format.

40 CFR Part 60, Subpart OOOOb, Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced After December 6, 2022 (Subpart OOOOb)

The compressors associated with all units at this facility were installed prior to the December 6, 2022, applicability date of this regulation; therefore, this facility is not subject to this Subpart.

National Emission Standards for Hazardous Air Pollutants (NESHAP/MACT)

40 CFR Part 63, Subpart YYYY, National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines (Subpart YYYY) [Adopted by reference in ADEM Admin. Code r. 335-3-11-.06(102)]

This facility is not a major source of HAP emissions; therefore, none of the combustion turbines at the facility are affected sources under this Subpart.

40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (Subpart ZZZZ) [Adopted by reference in ADEM Admin. Code r. 335-3-11-.06(103)]

Under this Subpart, Auxiliary Unit No. 1 is considered a new affected source since it was constructed after the June 12, 2006, applicability date. According to 40 CFR §63.6590(c), any new spark ignition (SI) stationary RICE located at an area source of HAP emissions must meet the requirements of Subpart ZZZZ by meeting the requirements of Subpart JJJJ. No further requirements apply to Auxiliary Unit No. 1 under Subpart ZZZZ.

Mandatory Greenhouse Gas Reporting

40 CFR Part 98, Subpart A General Provision

This facility is subject to a listed source category (Petroleum and Natural Gas Systems in Subpart W) as defined in 40 CFR §98.2(a)(2) and Table A-4, and is subject to this rule since the aggregate maximum rated heat input capacity of the stationary fuel combustion units at the facility is 30 MMBtu/hr or greater and the facility has the potential to emit 25,000 metric tons (27,558 TPY) of CO₂e or more per year from all stationary fuel combustion sources combined. Transco must calculate greenhouse gas quantities annually according to the methodologies described in 40 CFR §98.2(c). In accordance with 40 CFR §98.3(g), Transco would be required to maintain records of actual CO₂, CH₄, and N₂O emissions to determine the actual CO₂e emissions. If such emissions exceed the 25,000 metric tons per year threshold, then an annual report must be submitted no later than March 31 of each calendar year thereafter per 40 CFR §98.3(b). In accordance with 40 CFR §98.5, the annual report must be submitted electronically via EPA's Central Data Exchange in accordance with the requirements of 40 CFR §98.4. While this facility is required to report greenhouse gas emissions to EPA per 40 CFR Part 98, these requirements do not meet the definition of "applicable requirements" under 40 CFR §70.2 and ADEM Admin. Code r. 335-3-

16-.01(1)(e). Therefore, the requirements of 40 CFR Part 98 are not required to be included in the Title V permit.

Applicability: State Regulations

ADEM Admin. Code r. 335-3-4-.01, “Control of Particulate Emissions: Visible Emissions”

The engine and turbines are each subject to the State visible emissions standards of ADEM Admin. Code r. 335-3-4-.01(1), which states that no air emission source may emit particulate of an opacity greater than 20% (as measured by a six-minute average) more than once during any 60 minute period and at no time shall emit particulate of an opacity greater than 40% (as measured by a six-minute average).

ADEM Admin. Code r. 335-3-4-.02, “Fugitive Dust and Fugitive Emissions”

This rule is applicable. However, all plant roads are paved or graveled. There are no raw materials, storage piles, products, etc. capable of generating fugitive dust at this facility. Therefore, additional specific requirements for fugitive dust are not necessary for this facility.

ADEM Admin. Code r. 335-3-4-.03, “Control of Particulate Emissions: Fuel Burning Equipment”

Although the engine and turbines are fuel combustion sources, they are not subject to any particulate matter (as TSP) emission limitation of ADEM Admin. Code Chap. 335-3-4 because they do not meet the definition of fuel burning equipment and are not considered one of the process industries, general or specific.

ADEM Admin. Code r. 335-3-5-.01, “Control of Sulfur Compound Emissions: Fuel Combustion”

Although the engine and turbines are fuel combustion sources, they are not subject to any sulfur dioxide (SO₂) emission limitation of ADEM Admin. Code Chap. 335-3-5 because they do not meet the definition of fuel burning equipment nor is this facility considered one of the process industries, general or specific.

Emission Testing and Periodic Monitoring

Transco is required to certify on a semiannual basis that only natural gas was burned in all units as a method for monitoring compliance with the visible emission requirements of ADEM Admin. Code r. 335-3-4-.01(1) because opacity would be negligible while combusting natural gas.

To monitor compliance with the applicable Subpart KKKK NO_x emission limit for Mainline Unit Nos. 1-4, Transco is required to conduct NO_x performance tests on an annual basis, with no more than fourteen (14) months elapsing between tests. 40 CFR §60.4340(a) states that if NO_x emission results from the initial performance test are less than or equal to 75% of the NO_x emission limit, then the frequency of subsequent performance tests may be reduced to once every two years. If the results of any subsequent performance test exceed 75% of the NO_x emission limit, then annual performance testing must resume. To satisfy the periodic monitoring requirement for Mainline Unit Nos. 1-4, Transco is also required to perform subsequent emission testing once per calendar year during which the unit operates for the purposes of production (i.e. the compression/transmission of natural gas), with no more than fourteen (14) months elapsing between tests. Periodic monitoring may be conducted concurrently with the annual or biennial

EPA Reference Method test that is required by Subpart KKKK. No periodic monitoring is required if the unit does not operate for production purposes during the annual testing period.

To determine compliance with the SO₂ standard in Subpart KKKK, for Mainline Unit Nos. 1-4, Transco must continue to demonstrate the fuel meets the definition of natural gas in 40 CFR §60.331(u) and 40 CFR §60.4365(a), respectively, per Transco's FERC Natural Gas Tariff.

To monitor compliance with the applicable Subpart JJJJ NO_x, CO, and VOC emission limits for Auxiliary Unit No. 1, and to satisfy the periodic monitoring requirement, Transco is required to conduct NO_x, CO, and VOC performance tests every 8,760 hours of operation or every three years, whichever comes first. To monitor compliance with the applicable 500 hours per year operational limitation for Auxiliary Unit No. 1, within 15 days of the end of the calendar month Transco is required to calculate the number of hours of operation for the previous month and the previous 12-month period.

Recordkeeping and Reporting

In addition to the recordkeeping and reporting requirements of Subpart JJJJ for Auxiliary Unit No. 1, Subpart KKKK for Mainline Unit Nos. 1 through 4, and Subpart OOOOa for Mainline Unit No. 4, as part of the Semiannual Monitoring Report, Transco is required to include a statement addressing whether only natural gas was fired in each unit during the respective reporting period as a method for monitoring compliance with the visible emission requirements of ADEM Admin. Code r. 335-3-4-.01(1). Transco is also required to include a statement addressing whether a unit operated for production purposes during the respective reporting period. Transco is required to submit the results of all emission tests conducted to the Air Division within 30 days of the actual completion of the test, unless stated otherwise in an applicable regulation. Transco is required to maintain the most current fuel tariff sheet on-site in a form suitable for inspection as a method for monitoring compliance with 40 CFR §60.4330(a) of Subpart KKKK for Mainline Unit Nos. 1-4. Transco is required to maintain records of the hours of operation on a monthly and 12-month rolling total basis in a form suitable for inspection as a method for monitoring compliance with the applicable 500 hr/yr operational limitation for Auxiliary Unit No. 1. In accordance with ADEM Admin. Code r. 335-3-16-.05(c)2.(ii), all required records shall be maintained in a permanent form suitable for inspection for a period of 5 years from the date of generation of each record and be made available upon request.

Compliance Assurance Monitoring (CAM)

Compliance Assurance Monitoring (CAM), 40 CFR Part 64, applies to any pollutant-specific emission unit at a major source that is required to obtain an operating permit, in accordance with 40 CFR §64.5, if it meets all of the following criteria:

- It is subject to an emission limit or standard for an applicable regulated air pollutant.
- It uses a control device to achieve compliance with the applicable emission limit or standard.
- It has potential emissions, prior to the control device, of the applicable regulated air pollutant of 100 TPY of a criteria pollutant, 10 TPY of an individual HAP, or 25 TPY of total HAP.

None of the emission units at the facility emit greater than 100 TPY of any criteria pollutant or employ an active control device as defined in the CAM regulations. As such, the facility is not required to submit a CAM plan for this renewal.

Public Participation

The renewal of this Title V MSOP would require a 30-day public comment period and a 45-day EPA review period.

Recommendation

Based on the above analysis, I recommend that Transcontinental Gas Pipe Line Company, LLC's Title V MSOP (104-0031) be renewed with the requirements noted above, pending the resolution of any comments received during the 30-day public comment period and the EPA 45-day review.



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April 16, 2025
Date

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