STATEMENT OF BASIS
FLORIDA GAS TRANSMISSION COMPANY
COMPRESSOR STATION 11
MT. VERNON, MOBILE COUNTY, ALABAMA
FACILITY/PERMIT NO. 503-3028

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.

Florida Gas Transmission Company, LLC (Florida Gas) originally constructed/began operations in 1962. The current MSOP was issued on March 19, 2021, became effective on March 19, 2021, and is scheduled to expire on December 28, 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 June 28, 2025, but no earlier than December 28, 2023. The initial application for this permit renewal was submitted June 26, 2025, and received June 30, 2025. Updated applications were submitted and received to the Department via electronic mail on October 2, 2025. The application was deemed complete on October 2, 2025. The initial MSOP was issued on December 29, 2000, and this is the fifth renewal of the MSOP.

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

There are no current or ongoing enforcement actions against Florida Gas 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 AL0000000109703028).

Facility Operations

Florida Gas operates a compressor station for the transmission of pipeline natural gas (SIC 4922) located in Mt. Vernon (Mobile County).

The following are the significant sources of air pollutants at this facility:

Florida Gas Unit No.	MSOP Emission Unit No.	ENGINE/TURBINE DESCRIPTION	INSTALLATION (MODIFICATION) DATE
1101	001	2,000 hp Cooper Bessemer (LS-8-SG) 4SLB, natural gas-fired RICE	1962
1102	002	2,000 hp Cooper Bessemer (LS-8-SG) 4SLB, natural gas-fired RICE	1962
1103	003	2,000 hp Cooper Bessemer (LS-8-SG) 4SLB, natural gas-fired RICE	1962
1104	004	2,000 hp Cooper Bessemer (LS-8-SG) 4SLB, natural gas-fired RICE w/ catalytic converter	1966 (Modified 2002)
1105	005	2,000 hp Cooper Bessemer (LS-8-SG) 4SLB, natural gas-fired RICE	1968

Florida Gas Unit No.	MSOP Emission Unit No.	ENGINE/TURBINE DESCRIPTION	INSTALLATION (MODIFICATION) DATE
1106	006	2,700 hp Cooper Bessemer (GMVR-12C2) 2SLB, natural gas-fired RICE	1991
1107	007	15,000 hp natural gas-fired Solar (Mars 100-S) Turbine	1997 (Modified 2001)
1108	008	15,000 hp natural gas-fired Solar (Mars 100-S) Turbine	1997 (Modified 2001)
1109	009	15,700 hp natural gas-fired GE (previously Nuovo Pignone) (GE-10B2) Turbine	2002
1131 (previously identified as Emergency Generator Engine No. 2)	010	800 hp Waukesha (L36GL) 4SLB natural gas-fired RICE	2002 (Manufactured in 2001)
1132 (previously identified as Emergency Generator Engine No. 3)	011	224 hp Generac (SG150) 4SRB, natural gas-fired RICE	2010 (Manufactured in November 2008)

4SLB=4-stroke lean burn
2SLB=2-stroke lean burn
4SRB=4-stroke rich burn
RICE=reciprocating internal combustion engine

The following are the insignificant emission sources at this facility:

- One (1) 10,000 gallon horizontal fixed roof lube oil storage tank
- One (1) 3,000-gallon horizontal fixed roof lube oil storage tank
- One (1) 2,500 gallon horizontal fixed roof lube oil storage tank
- One (1) 8,820 gallon vertical fixed roof condensate storage tank
- Two (2) 8,820 gallon vertical fixed roof oily wastewater storage tanks
- One (1) 4,662 gallon vertical fixed roof oily wastewater storage tank
- One (1) 1,000 gallon horizontal fixed roof lube oil storage tank
- One (1) 500 gallon dual compartment fuel tank (consists of a 250 gallon diesel storage compartment and a 250 gallon gasoline storage compartment)

Proposed Changes

There have been no modifications to or additions of significant emission sources at this facility since the issuance of the current MSOP. However, Florida Gas is requesting to uprate two existing electric motors Nos. 1110-1111 and also requesting a reduction in testing frequency from semiannual testing to annual testing for Emission Unit Nos. 004 and 006 (Compressor Engines 1104, 1106).

In a letter dated October 6, 2022, the Department concurred with Florida Gas's determination that the uprating of the existing electric motors to their current capacity would not impact applicability to any federal or state air regulations. Regarding the conditions determined in the application for the proposal to uprate two existing electrical motors Nos. 1110-1111, the Department concurs with

Florida Gas's determination that the proposed changes will not impact applicability to any federal or state air regulations.

Florida Gas is proposing a reduction in testing frequency from semiannual testing to annual testing for Emission Unit Nos. 004, 006 (Compressor Engines 1104, 1106) and Emission Unit Nos. 007-009 (Compressor Turbines 1107-1109). A compliance history is summarized in Table 4-2 of the application which demonstrates that Emission Unit Nos. 004, 006-009 are consistently under 75% of the permitted limits of 22.17lb/hr of NO_x and 3.53 lb/hr of CO for Emission Unit No. 004 and 10.58 lb/hr of NO_x for Emission Unit No. 006. Florida Gas is proposing to modify the current Unit Specific Proviso No. 4 for Emission Unit Nos. 004, 006-009.

The current proposal would modify the current permitted language from, "Emission testing shall be conducted semiannually to determine compliance with the applicable emission standard(s). Testing shall be conducted twice per calendar year at a frequency of once per semiannual period (January 1st - June 30th and July 1st - December 31st), with a minimum of three (3) calendar months elapsing between tests", to, "*Emission testing shall be conducted semiannually to determine compliance with the emission standard(s). Testing shall be conducted twice per calendar year a frequency of once per semiannual period (January 1st- June 30th and July 1st – December 31st), with a minimum of three (3) calendar months elapsing between tests. After you have demonstrated compliance below 75% of the emission limit establish herein for two consecutive tests, you may reduce the frequency of subsequent performance tests to once per annual period (January 1st – December 31st), with a minimum of six (6) calendar months elapsing between tests. If the results of any subsequent annual performance test indicate the unit is testing above 75% of the emission limit, you must resume semiannual performance tests."* Based on the compliance history of Emission Unit Nos. 004, 006-009, the Department will grant Florida Gas' request and modify the MSOP to reflect the reduced compliance testing frequency.

Permit History

Issuance No./Permit No.	Limit(s) Established	Issuance Date	Effective Date	Expiration Date	PSD Exceeded (Y/N)
Emission Unit Nos. 001-003	Installed in 1962 and are considered grandfathered for purposes of PSD since the units were installed prior to the Clean Air Act Amendments of 1977.				--
Emission Unit Nos. 004	Installed in 1966 and is considered grandfathered for purposes of PSD since the unit was installed prior to the Clean Air Act Amendments of 1977.				--
Emission Unit Nos. 005	Installed in 1968 and is considered grandfathered for purposes of PSD since the unit was installed prior to the Clean Air Act Amendments of 1977.				--
AP X001 (Emission Unit No. 006)	NO_x PSD SMS emission limits established	December 11, 1990	--	--	**N**
AP X002 (Emission Unit No. 007)	NO_x and CO PSD SMS emission limits established	April 27, 1993	--	--	**N**
AP X003 (Emission Unit No. 008)	NO_x and CO PSD SMS emission limits established	April 27, 1993	--	--	**N**

Issuance No./Permit No.	Limit(s) Established	Issuance Date	Effective Date	Expiration Date	PSD Exceeded (Y/N)
AP X004 (Emission Unit No. 007)	NO_x and CO PSD SMS emission limits established	March 3, 1998	--	--	**N**
AP X005 (Emission Unit No. 008)	NO_x and CO PSD SMS emission limits established	March 3, 1998	--	--	**N**
AP X006 (Emission Unit No. 007)	--	March 2, 2000	--	--	**N**
AP X007 (Emission Unit No. 008)	--	March 2, 2000	--	--	**N**
AP X008 (Emission Unit No. 009)	PSD operational limits decreased, limited emission rates at selected loads and capped annual CO to remain below PSD thresholds. Emission rates for NO_x established using peak load as worst case.	July 17, 2001	--	--	**N**
AP X009 (Emission Unit No. 004)	PSD SMS Operational limits established	July 17, 2001	--	--	**N**
AP X010 (Emission Unit No. 004)	PSD SMS NO_x limit decreased	July 14, 2003	--	--	**N**
AP X011 (Emission Unit No. 007)	PSD SMS NO_x limits increased	April 21, 2003	--	--	**N**
AP X012 (Emission Unit No. 008)	PSD SMS NOx limits increased	April 21, 2003	--	--	**N**
AP X013 (Emission Unit No. 009)	PSD SMS CO limits removed for specific loads, established CO limits at all loads	August 12, 2005	--	--	**N**
AP X014 (Emergency Generator Engine No. 3)	--	September 10, 2009	--	--	**N**
Initial Title V MSOP	--	December 29, 2000	December 29, 2000	December 28, 2005	**N**
1st Title V MSOP Renewal	--	December 1, 2005	December 29, 2005	December 28, 2010	**N**
2nd Title V MSOP Renewal	--	March 2, 2011	March 2, 2011	December 28, 2015	**N**
3rd Title V MSOP Renewal	--	June 20, 2016	June 20, 2016	December 28, 2020	**N**
4th Title V MSOP Renewal	--	March 19, 2021	March 19, 2021	December 28, 2025	**N**

Applicability: Federal Regulations

Title V

This facility is considered a major source under Title V regulations because the potential emissions for nitrogen oxides (NO_x) and carbon monoxide (CO) exceed the 100 TPY major source threshold. This facility is considered a major source of hazardous air pollutants (HAP) because the potential emissions from an individual HAP (formaldehyde) exceed 10 TPY and the total HAP potential emissions exceed 25 TPY.

Prevention of Significant Deterioration (PSD)

This facility is located in an attainment area for all criteria pollutants and the facility operations are not one of the 28 listed major source categories; therefore, the applicable major source threshold is 250 TPY for criteria pollutants. Florida Gas is considered a major source under PSD regulations because the potential emissions for NO_x and CO exceed the 250 TPY major source threshold. Florida Gas currently has one unit with a PSD/BACT emission limit and four units with PSD synthetic minor emission limits. The origins and modifications of these limitations/requirements are chronicled below:

- Emission Unit (EU) No. 006 underwent PSD review for NO_x on September 8, 1992, which established a PSD/BACT limit for NO_x (10.58 lbs/hr). This limit is still in effect because the engine has not been modified since.
- EU Nos. 007 and 008 are each subject to PSD synthetic minor emission limits for NO_x (15.0 lb/hr) and CO (13.51 lb/hr). For historical clarification purposes, the original turbines, designated by Florida Gas as Unit Nos. 1107 and 1108, underwent PSD review for NO_x and CO in April 1993 before they were initially installed. In 1998, the two turbines were replaced with the turbines that are currently onsite. After the replacement, Florida Gas identified the two new units using the same Unit Nos. that were previously used to identify the replaced units. Synthetic minor emission limits for NO_x and CO were established for the replacement turbines to restrict the net emission increases below the PSD significant emission thresholds for NO_x and CO. Subsequently, the replacement turbines underwent a physical modification in 2001 to increase the rated capacity from 12,600 bhp to 15,000 bhp; therefore, the synthetic minor emission limits for NO_x and CO were adjusted once again to restrict the net emission increases below the PSD significant emission thresholds. In 2003, Florida Gas requested to increase the synthetic minor limit for NO_x for each turbine because the units were not performing up to the manufacturer's specifications. To offset the potential emission increase, Florida Gas requested a decrease to the NO_x emission limit for EU No. 004.
- EU Nos. 004 and 009 are each subject to PSD synthetic minor limitations that were established to limit the net emission increases for NO_x (EU No. 004 22.17 lb/hr; EU No. 009 14.1 lb/hr) and CO (EU No. 004 3.53 lb/hr; EU No. 009 11.1 lb/hr) to below the PSD significant emission thresholds. These limits were established as a result of the installation of EU No. 009, the combustion modification of EU No. 004, and the increase in the rated capacities of EU Nos. 007 and 008.
- EU No. 011 is subject to an operational limit of 500 hr/yr to limit the potential emissions of the engine in anticipation of future expansion.

New Source Performance Standards (NSPS)

40 CFR Part 60, Subpart JJJJ, New Source Performance Standards for Stationary Spark Ignition Internal Combustion Engines (Subpart JJJJ)

EU No. 011 is subject to 40 CFR Part 60, Subpart JJJJ, New Source Performance Standards for Stationary Spark Ignition Internal Combustion Engines (Subpart JJJJ), because it was manufactured in November 2008, prior to the January 1, 2009, applicability date for emergency

engines. Therefore, this unit has no applicable emission standards under Subpart JJJJ. However, Florida Gas is required to maintain records of the hours of operation for this unit to ensure the engine continues to meet the definition of an emergency unit. If the status of the engine should change from an emergency unit to a non-emergency unit, the engine would be subject to the applicable requirements of Subpart JJJJ.

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 all units at this facility were installed prior to the August 23, 2011, the applicability date of this regulation and have not been reconstructed or modified; therefore, 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 compressors associated with all units at this facility were installed prior to the September 18, 2015, applicability date of this regulation and have not been reconstructed or modified; therefore, this facility is not subject to this Subpart.

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 and have not been reconstructed or modified; therefore, this facility is not subject to this Subpart.

40 CFR Part 60, Subpart GG, Standards of Performance for Stationary Gas Turbines (Subpart GG)

EU Nos. 007-009 are each subject to 40 CFR Part 60, Subpart GG, the Standards of Performance for Stationary Gas Turbines (Subpart GG), because the turbines were each manufactured after October 3, 1977, the applicability date of Subpart GG; therefore, these units are subject to applicable NO_x and SO_2 emission limits. The NO_x emission limits applicable to these turbines may be calculated using site specific data, using the equation found under 40 CFR Part 60.332(a)(1). Florida Gas has calculated the NO_x limit for EU Nos. 007 and 008 to be 195 ppmvd at 15% oxygen and for EU No. 009 to be 196 ppmvd at 15% oxygen. Performance testing for each turbine demonstrated that each unit can comply with the applicable NO_x standard. Each of the turbines are subject to an SO_2 emission limit of 150 ppmvd at 15% oxygen or a fuel sulfur content limit of 0.8% by weight. Florida Gas certifies the fuel burned in each unit meets the definition of natural gas by maintaining a current tariff sheet specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less as allowed by 40 CFR §60.334(h)(3)(i) to demonstrate compliance with the applicable SO_2 standard.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (Subpart ZZZZ)

EU Nos. 001-006 are each considered existing sources under 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines because each engine was constructed before the June 12, 2006, applicability date. 40 CFR §63.6590(b)(3)(i)-(ii) states that existing 2-stroke, lean-burn (2SLB) and 4-stroke, lean-burn, (4SLB) spark ignition (SI) stationary reciprocating internal combustion engines (RICE) with a site rating of more than 500 brake hp located at a major source of HAP do not have to meet the requirements of Subpart ZZZZ.

EU No. 010 is considered an existing source under 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines because the engine was constructed before the June 12, 2006, applicability date. In accordance with 40 CFR §63.6590(b)(3)(iii), existing emergency stationary RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions do not have to meet the requirements of Subpart ZZZZ.

EU No. 011 was constructed after the June 12, 2006, applicability date; therefore, the engine is considered a new source under Subpart ZZZZ and meets the requirements of this Subpart by meeting the requirements of 40 CFR Part 60, Subpart JJJJ for SI engines. According to Subpart JJJJ, emergency engines that were manufactured before January 1, 2009, have no applicable emission standards under this Subpart.

40 CFR Part 63, Subpart YYYY, the National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines (Subpart YYYY)

EU Nos. 007-009 are each considered existing stationary combustion turbines under 40 CFR Part 63, Subpart YYYY, the National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines. In accordance with 40 CFR §63.6090(b)(4), existing stationary combustion turbines do not have to meet the requirements of 40 CFR Part 63, Subpart YYYY.

Mandatory Greenhouse Gas Reporting

40 CFR Part 98, Subpart A General Provision

The facility is a listed source category in Table A-4 of 40 CFR Part 98, Subpart A, as defined in 40 CFR §98.230(a)(4), it is subject to this rule in accordance with 40 CFR §98.2(a)(2) 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 CO_2e or more per year from all stationary fuel combustion sources combined. Bay Gas must calculate greenhouse gas quantities annually according to the methodologies described in 40 CFR §98.2(b). In accordance with 40 CFR §98.3(g), Bay Gas would be required to maintain records of actual CO_2, CH_4, and N_2O emissions to determine the actual CO_2e 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 engines, turbines, and emergency generator engines are each subject to the 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"

The engines, turbines, and emergency generator engines are fuel combustion sources; however, they are not subject to any particulate matter (as TSP) emission standard of ADEM Admin. Code Chap. 335-3-4 because they do not meet the definition of fuel burning equipment nor is this facility 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 engines, turbines, and emergency generator engines are fuel combustion sources, they are not subject to any sulfur dioxide (SO_2) emission limitation of ADEM Admin. Code Chap. 335-3-5 because they do not meet the definition of fuel burning equipment.

Emission Testing and Periodic Monitoring

Florida Gas would be 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.

EU Nos. 004, 006, 007, 008, and 009

To monitor compliance with the applicable PSD synthetic minor emission limits and for the applicable 40 CFR Part 60, Subpart GG emission standard for NO_x for each unit, emission testing for NO_x and CO on EU Nos. 004 and 007-009, and for NO_x on EU No. 006, is required twice per calendar year at a frequency of once per semiannual period (January 1st - June 30th and July 1st - December 31st), with a minimum of three (3) calendar months elapsing between tests. After you have demonstrated compliance below 75% of the emission limit establish herein for two consecutive tests, you may reduce the frequency of subsequent performance tests to once per annual period (Jan 1st- December 31st), with a minimum of six (6) calendar months elapsing between tests. If the results of any subsequent annual performance test indicate the unit is testing

above 75% of the emission limit, you must resume semiannual performance tests. EU Unit No. 004 tested above 75% of the permitted limit during the second half semiannual test in 2024 and would not be eligible for annual testing until the completion of a successful second half 2025 test.

The first emission testing conducted following the issuance of this renewal shall be conducted using an approved U.S. EPA Reference Method for each pollutant. All subsequent emission testing during the permit term may be conducted using either an approved U.S. EPA Reference Method for each pollutant or utilizing a portable analyzer in accordance with a protocol/method approved in advanced by the Air Division.

To determine compliance with the SO_2 standard in 40 CFR Part 60, Subpart GG, Florida Gas must continue to demonstrate that the fuel combusted in EU Nos. 007-009 meets the definition of natural gas specified in 40 CFR §60.331(u) by maintaining a current tariff sheet or transportation contract specifying the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less and by submitting a semiannual compliance certification that only natural gas was fired in these units.

Recordkeeping and Reporting

For EU Nos 007-009, Florida Gas is required to maintain a record of a current fuel tariff sheet as required by 40 CFR §60.334(h)(3), on-site in a permanent form suitable for inspection. Additionally, Florida Gas is required to maintain a record of the hours of operation for EU Nos. 010 and 011 on a monthly and 12-month rolling total basis to ensure that the units are operated as emergency units and to demonstrate compliance with the 500 hr/yr operational limit for EU No. 011. Florida Gas is required to submit a semiannual certification stating only natural gas was fired in all units during the respective reporting period and that all emission monitoring was conducted as required during the respective reporting period. Florida Gas is also required to submit results of all emission tests conducted to the Air Division within 30 days of the completion of the test. 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.

The only unit equipped with an active control device is EU No. 004. Prior to making combustion modifications to this engine in 2002 to reduce NO_x, this unit had pre-control potential emissions of NO_x greater than 100 TPY. All other criteria pollutants for this unit were less than 100 TPY. Because the combustion modifications could increase CO emissions, Florida Gas installed a catalytic converter to reduce CO emissions. Although Florida Gas performed no emission testing

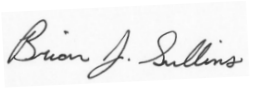
to quantify the increase in CO emissions after the combustion modifications, calculations using emissions test data for this unit with both the combustion modifications and catalytic converter in place indicate that the pre-control CO emissions are well below the 100 TPY major source threshold. A conservative control efficiency of 50% for the catalytic converter was assumed for these calculations. Because all three of the above CAM criteria are not met, this unit is not subject to CAM.

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 Florida Gas Transmission Company's Title V MSOP be renewed with the conditions noted above pending the resolution of any comments received during the 30-day public comment period and the EPA 45-day review period.



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February 5, 2026
Date

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