

**STATEMENT OF BASIS
TRANSCONTINENTAL GAS PIPE LINE COMPANY, LLC
STATION 110
WADLEY, RANDOLPH COUNTY, ALABAMA
FACILITY/PERMIT NO. 308-0014**

The proposed renewal to the Title V Major Source Operating Permit (MSOP) 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's (Transco) Station 110 was originally constructed/began operations in 1951. This is the fifth renewal of the MSOP. The current MSOP was issued on December 10, 2019, became effective on February 1, 2020, and expired on January 31, 2025. Per ADEM Admin Code r. 335-3-16-.12(2), an application for permit renewal must 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 July 31, 2024, but no earlier than July 31, 2023. An application for this permit renewal was received by the Department on July 24, 2024, with a revision received by the Department on December 15, 2025, and deemed complete on December 15, 2025.

The facility is located in Randolph 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 AL0000000111100014).

Facility Operations

Transcontinental Gas Pipe Line Company, LLC (Transco) operates a compressor station for the transmission of pipeline natural gas (SIC 4922) located in Wadley, Randolph 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 either a stationary reciprocating internal combustion engine or a stationary natural gas-fired turbine. 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-related activities and upset/emergency situations. Significant sources of air pollutants at this facility include:

Emission Unit Nos. 001 – 007: Seven (7) 2,500 hp Cooper GMW-10, 2-stroke, lean burn (2SLB) natural gas-fired reciprocating engines (Mainline Unit Nos. 1 – 7);

Emission Unit Nos. 008 – 009: Two (2) 2,625 hp Cooper GMWA-10, 2SLB natural gas-fired reciprocating engines (Mainline Unit Nos. 8 and 9);

Emission Unit Nos. 010 – 012: Three (3) 3,400 hp Cooper GMWC-10, 2SLB natural gas-fired reciprocating engines (Mainline Unit Nos. 10 – 12);

Emission Unit No. 013: One (1) 3,400 hp Cooper 10V-250, 2SLB natural gas-fired reciprocating engine (Mainline Unit No. 13);

Emission Unit Nos. 014 – 015: Two (2) 5,500 hp Cooper 16V-250, 2SLB natural gas-fired reciprocating engines (Mainline Unit Nos. 14 and 15);

Emission Unit Nos. 022 – 024: Three (3) 498 hp Caterpillar G3508LE, 4-stroke, lean burn (4SLB) natural gas-fired emergency reciprocating engines (Auxiliary Unit Nos. 1 – 3);

Emission Unit No. 025: One (1) 16,553 hp Solar Mars 100-16000, natural gas-fired turbine equipped with a Dry Low NO_x combustor (Mainline Unit No. 16);

Emission Unit No. 026: One (1) 23,383 hp Solar Titan 130-23502S, natural gas-fired turbine equipped with a Dry Low NO_x combustor (Mainline Unit No. 17); and

Emission Unit No. 027: One (1) 675 hp Dresser-Waukesha L36GL, 4SLB natural gas-fired emergency reciprocating engine (Auxiliary Unit No. 4)

Insignificant emission sources at this facility include gas starters, lube oil vents, pipeline blowdowns, and degreasers.

Proposed Changes

The draft MSOP includes the following change to the current permit:

- Incorporation of Requirements of Air Permit No. X022 for the 16,553 hp Solar Mars 100-16000, natural gas-fired turbine equipped with a Dry Low NO_x combustor (Emission Unit No. 025 (MLU 16)) (40 CFR Part 60, Subpart KKKK and Subpart OOOOb)
- Incorporation of Requirements of Air Permit No. X023 for the 23,383 hp Solar Titan 130-23502S, natural gas-fired turbine equipped with a Dry Low NO_x combustor (Emission Unit No. 026 (MLU 17)) (40 CFR Part 60, Subpart KKKK and Subpart OOOOb, and 40 CFR Part 63, Subpart YYYY)

Transco was issued Air Permit No. X022 on August 28, 2024, for the proposed modification of existing Emission Unit No. 025 (MLU 16), which included uprating the Solar Mars 100 turbine driver for Emission Unit No. 025 (MLU 16) from the current 15,000 hp at International Organization for Standardization (ISO) conditions to 15,900 hp at ISO conditions and replace the natural gas starter with an electric starter. The Air Division uses the maximum operating capacity for permitting purposes; therefore, this equated to a maximum hp increase from 14,344 hp to 16,553 hp for Emission Unit No. 025 (MLU 16). Also, due to the reduction in potential emissions as a result of the unit being equipped with Solar dry low NO_x combustion technology (SoLoNO_x), Transco proposed to remove the two different PSD synthetic minor source (SMS) emission limitations on Emission Unit No. 025 (MLU 16) that were placed at various times in its permitting history. The limits Transco requested to be removed from the Mainline Unit No. 16 unit included a 98.6 lb/hr NO_x emission limit originally established in 1996 and a 7,500 hr/yr operating limit originally established in 2009. Temporary Authorization to Operate was issued on April 2, 2025. After an inspection was conducted by Air Division personnel on July 29, 2025, and after

completing an emissions test on August 6, 2025, which demonstrated compliance with the applicable emissions standards, Authorization to Operate was granted to Transco on October 15, 2025.

Transco was issued Air Permit No. X023 on August 28, 2024, for the proposed modification of existing Emission Unit No. 026 (MLU 17), which included uprating the Solar Titan 130 turbine driver for Mainline Unit No. 17 from the current 20,500 hp at ISO conditions to 23,465 hp at ISO conditions and replace the natural gas starter with an electric starter. The Air Division uses the maximum operating capacity for permitting purposes; therefore, this equated to a maximum hp increase from 21,218 hp to 23,383 hp for Emission Unit No. 026 (MLU 17). Temporary Authorization to Operate was issued on June 11, 2025. After an inspection was conducted by Air Division personnel on July 29, 2025, and after completing an emissions test on August 5, 2025, which demonstrated compliance with the applicable emissions standards, Authorization to Operate was granted to Transco on October 15, 2025.

Permit History

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

Issuance No./Permit No.	Issuance Date	Effective Date	Expiration Date	Amendments/ Modifications (if applicable)	PSD SER Exceeded (Y/N)
AP* Z001 - MLU 1-15 - NO _x SMS** emission limit established via Hp-hr restriction due to MLU 16 installation to not exceed PSD SER	May 18, 1989	--	--	--	N
AP X002 - MLU 16 - (new) NO _x SMS emission limit established via Hp-hr restriction and NO _x SMS lb/hr restriction to not exceed PSD SER	May 18, 1989	--	--	--	N
AP X002 - MLU 16 - Uprate hp, SMS Hp-hr restriction removed on all units 1-16, Old NO _x lb/hr SMS limit removed, New NO _x lb/hr SMS emission limit established to not exceed PSD SER	January 23, 1996	--	--	--	N
AP X003 - MLU 14 - clean burn modification to reduce emissions- SMS Hp-hr restriction removed- NO _x lb/hr SMS emission limit established to not exceed PSD SER	January 23, 1996	--	--	--	N
AP X004 - MLU 15 - clean burn modification to reduce emissions- SMS Hp-hr restriction removed- NO _x lb/hr SMS emission limit established to not exceed PSD SER	January 23, 1996	--	--	--	N

Initial Title V MSOP	February 1, 2000	February 1, 2000	January 31, 2005	--	--
1 st Title V MSOP Renewal	December 10, 2004	February 1, 2005	January 31, 2010	Sig Mod - July 24, 2007 - incorporate requirements of AP Nos. X005-X018 Administrative Amendment - February 26, 2009 - Name change	--
AP X005-X018 - MLU 1-12 & 14-15 - NO _x reduction project for Phase II of EPA's NO _x SIP Call-Ozone season NO _x emission limits/recordkeeping/testing established for MLU 1-12	June 17, 2005	--	--	--	N
AP X019-X021 - MLU 17 (new), AUX 4 (new) - SMS hours limit established, MLU 16-SMS hours limit established	September 14, 2009	--	--	--	N
2 nd Title V MSOP Renewal	January 4, 2010	February 1, 2010	January 31, 2015	--	--
3 rd Title V MSOP Renewal	August 18, 2015	August 18, 2015	January 31, 2020	--	--
4 th Title V MSOP Renewal	December 10, 2019	February 1, 2020	January 31, 2025	--	--
AP X022 - MLU 16 - Uprate hp; Remove old NO _x SMS lb/hr limit and operating hr limit; New NO _x ppmvd and lb/hr SMS emission limit established	August 28, 2024	--	--	--	N
AP X023 - MLU 17 - Uprate hp; New NO _x ppmvd and lb/hr SMS emission limit established	August 28, 2024	--	--	--	N

*AP = Air Permit

**SMS = PSD Synthetic Minor Source

Plant-Wide Potential to Emit (PTE)

Pollutant	PTE (TPY)
PM/PM ₁₀ /PM _{2.5}	81.78
NO _x	2,498.00
CO	755.00
SO ₂	6.02
VOC	282.08
50000 (Formaldehyde)	83.21
107028 (Acrolein)	11.58
75070 (Acetaldehyde)	11.61
Total HAP	120.10
CO _{2e}	405,809.00

Applicability: Federal Regulations

Title V

This facility is a major source under Title V regulations because the potential emissions for nitrogen oxides (NO_x), carbon monoxide (CO), and Volatile Organic Compounds (VOC) each exceed the 100 TPY major source threshold. It is also a major source of Hazardous Air Pollutants (HAP) because individual HAP potential emissions exceed 10 TPY (formaldehyde PTE ~83.21 TPY, Acrolein PTE ~11.58 TPY, and Acetaldehyde PTE ~11.61 TPY) and the total HAP potential emissions exceed 25 TPY (PTE ~120.10 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 is a major source under PSD regulations because the facility-wide potential emissions of NO_x, CO, and VOC each exceed 250 TPY. Mainline Unit Nos. 1-13 were installed prior to the PSD applicability date of January 1977 (1951 - Mainline Unit Nos. 1-7; 1958 - Mainline Unit Nos. 8-9; 1962 - Mainline Unit No. 10; 1963 - Mainline Unit Nos. 11-12; and 1968 - Mainline Unit No. 13). When Mainline Unit No. 16 was permitted in 1989, Transco requested PSD synthetic minor operational horsepower-hour limitations on Mainline Unit Nos. 1-13 in order to install Mainline Unit No. 16 without exceeding PSD significant emissions rates (SER). Subsequently, in a 1996 permitting action to upgrade the horsepower of Mainline Unit No. 16 that also involved retrofitting Mainline Unit Nos. 14 and 15 with clean burn technology to reduce NO_x emissions, the PSD synthetic minor operational horsepower-hour limitations established in 1989 were removed from Mainline Unit Nos. 1-13; however, Mainline Unit Nos. 1-12 and 14-15 were modified in 2005 with High Pressure Fuel Injection (HPFi) technology in order to reduce NO_x emissions and achieve compliance with the NO_x SIP Call Phase II Rule. Mainline Unit Nos. 1-12 are each subject to NO_x emission limits that are only applicable during ozone season (May 1st through September 30th) and are not considered synthetic minor source limits for PSD. Mainline Unit Nos. 1-7 are each subject to an ozone season NO_x emission limit of 22.87 lb/hr, Mainline Unit Nos. 8 and 9 are each subject to an ozone season NO_x emission limit of 24.02 lb/hr, and Mainline Unit Nos. 10-12 are each subject to an ozone season NO_x emission limit of 31.11 lb/hr.

Mainline Unit Nos. 14 and 15 were installed in 1968 and 1971, respectively, prior to the PSD applicability date of January 1977, and initially had no applicable emission limitations. When Mainline Unit No. 16 was permitted in 1989, Transco requested PSD synthetic minor operational horsepower-hour limitations on Mainline Unit Nos. 1-15 in order to install Mainline Unit No. 16 without exceeding PSD SER. A PSD synthetic minor operational horsepower-hour limitation and a PSD synthetic minor NO_x emission limitation of 65.54 lb/hr were also established at that time for Mainline Unit No. 16 so that the net emissions increase from this project did not exceed the PSD SER. Subsequently in 1996, Mainline Unit Nos. 14 and 15 were each retrofitted with clean burn technology to reduce NO_x emissions to offset a NO_x emission increase caused by a horsepower upgrade to Mainline Unit No. 16. At that time, the PSD synthetic minor operational horsepower-hour limitations established in 1989 were removed, and new PSD synthetic minor emission limits for NO_x were established for Mainline Unit Nos. 14-15 (48.5 lb/hr, each), to prevent NO_x emissions from the upgrade of Mainline Unit No. 16 from exceeding the PSD SER. The PSD synthetic minor operational horsepower-hour limitation and the PSD synthetic minor NO_x emission limitation of 65.54 lb/hr established in 1989 were removed, and a new PSD synthetic minor emission limit for NO_x was established for Mainline Unit No. 16 (98.6 lb/hr), in order to not exceed the PSD SER. During the same 1996 permitting action, the PSD synthetic minor operational horsepower-hour limitations established in 1989 were removed from the remaining Mainline Unit Nos. 1-13.

Auxiliary Unit Nos. 1-3 were installed in 2005 as replacements for the existing auxiliary units due to the need for increased electrical load associated with the installation of the HPFi technology on Mainline Unit Nos. 1-12 and Mainline Unit Nos. 14 and 15. The new emergency units are larger in size, but cleaner burning and required no emission limitations to limit the PTE below the SER.

In a 2009 permitting action, Transco requested Mainline Unit No. 16 be additionally limited to 7,500 hours of operation per year in order to install the then new Mainline Unit No. 17 and Auxiliary Unit No. 4 to limit the PTE below the PSD SER. Also, Transco requested Auxiliary Unit No. 4 be limited to 500 hours of operation per year in order to limit the PTE below the PSD SER.

In the most recent 2024 permitting action, due to the reduction in potential emissions as a result of the horsepower uprating of Mainline Unit No. 16 and the unit being equipped with SoLoNO_x, Transco proposed to remove the two different PSD SMS emission limitations on Mainline Unit No. 16 that were placed at various times in its permitting history. The limits Transco requested to be removed from the Mainline Unit No. 16 unit include a 98.6 lb/hr NO_x emission limit originally established in 1996 and a 7,500 hr/yr operating limit originally established in 2009. Using the applicable 40 CFR Part 60, Subpart KKKK NO_x emission limit of 25 ppmvd at 15% O₂ for the modified Mainline Unit No. 16, potential NO_x emissions from the turbine exceeded the 40 TPY PSD SER. Therefore, Transco requested an SMS NO_x emission limit of 9 ppmvd at 15% O₂ or 4.55 lb/hr, based on manufacturer's data in order to limit the PTE of Mainline Unit No. 16 to below

the PSD SER. The future net emissions increase of any regulated air pollutant from the project as a whole did not exceed the respective PSD SER.

In the same 2024 permitting action as the modification of Mainline Unit No. 16, Mainline Unit No. 17 also underwent a horsepower uprating modification. Using the applicable 40 CFR Part 60, Subpart KKKK NO_x emission limit of 25 ppmvd at 15% O₂ for the modified Mainline Unit No. 17, the potential NO_x emissions from the turbine exceeded the 40 TPY PSD SER. Therefore, Transco requested an SMS NO_x emission limit of 9 ppmvd at 15% O₂ or 6.10 lb/hr, based on manufacturer's data in order to limit the PTE of Mainline Unit No. 17 to below the PSD SER. The future net emissions increase of any regulated air pollutant from the project as a whole did not exceed the respective PSD SER.

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 No. 16 was manufactured after the Subpart GG, applicability date of October 3, 1977 (1990), and has a heat input at peak load equal to or greater than 10 MMBtu/hr. However, it met the definition of a modified unit in 2024 when it underwent a horsepower uprating and was equipped with SoLoNO_x; therefore, it is not subject to this Subpart and is now 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. 4 is subject to this Subpart since it was ordered after June 12, 2006, and manufactured after January 1, 2009, the applicability dates for this Subpart. It is classified as an emergency 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 VOC. In accordance with 40 CFR §60.4233(e) and Table 1 to Subpart JJJJ, Auxiliary Unit No. 4 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 that because the unit is an emergency engine, Transco is limited to operating the unit 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(d)(3)(i) states the 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met: the engine is dispatched by the local balancing authority or local transmission and distribution system operator, the dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region, the dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines, the power is provided only to the facility itself or to support the local transmission and distribution system, and the owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine, and the local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

40 CFR §60.4243(e) states owners and operators of stationary SI natural gas fired engines may operate their 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. 4 is equipped with a non-resettable hour meter as required by 40 CFR §60.4237(a).

Testing Requirements

This 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 testing conducted on May 18, 2023, for this emergency engine 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 owners and operators 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. 40 CFR §60.4245(f) states that beginning on February 26, 2025, within 60 days after the date of completing each performance test, you must submit the results following the procedures specified in 40 CFR §60.4245(g). 40 CFR §60.4245(g) requires all reports be submitted through EPA's Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>). 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)]

Both Mainline Unit No. 16 and Mainline Unit No. 17 are subject to this Subpart, because they each have a heat input at peak load greater than 10 MMBtu/hr and construction and/or modification of each unit commenced after the February 18, 2005, applicability date. Mainline Unit No. 16, which was previously subject to 40 CFR Part 60, Subpart GG, is now subject to Subpart KKKK as a result of its modification status that was permitted in 2024 and physically occurred in 2025. Mainline Unit No. 17 has been subject to Subpart KKKK since its initial permitting action that occurred in 2009. The turbines are each classified as a new turbine firing natural gas with a heat input at peak load between 50 MMBtu/hr and 850 MMBtu/hr.

Emission Limitations

Subpart KKKK regulates emissions of NO_x and SO₂. In accordance with 40 CFR §60.4320 and Table 1 to Subpart KKKK, each turbine is subject to a NO_x emission limit of 25 ppmvd at 15% O₂ or 150 ng/J of useful output (1.2 lb/MWh). Transco has elected to comply with the NO_x emission limit of 25 ppmvd at 15% O₂. 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. Each turbine is subject to an emission limit of 9 ppmvd at 15% O₂ for NO_x based on manufacturer's data in order to remain below the PSD SER level for NO_x. As a result, when demonstrating compliance with each PSD SMS emission limitation for NO_x, Transco will satisfy the compliance requirements with each Subpart KKKK requirement. 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 would 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 would be 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). 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 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 (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. Performance testing for each turbine demonstrated that they can comply 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.

As a major source under Title V regulations and in accordance with ADEM Admin. Code r. 335-3-16-.05(c), 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. Transco must retain records of the most recent 2 years on site. Records of the remaining 3 years may be retained off site.

40 CFR Part 60, Subpart KKKKa, Standards of Performance for Stationary Combustion Turbines (Subpart KKKKa)

This Subpart establishes emission standards and compliance schedules for the control of emissions from stationary combustion turbines that commenced construction, modification, or reconstruction after December 13, 2024. 40 CFR Part 60, Subpart A General Provisions, specifically 40 CFR §60.2 defines “commenced” as the following: *Commenced means, with respect to the definition of new source in section 111(a)(2) of the Act, that an owner or operator has undertaken a continuous program of construction or modification or that an owner or operator has entered into a contractual obligation to undertake and complete, within a reasonable time, a continuous program of construction or modification.* Although the physical modifications of Mainline Unit Nos. 16 and 17 commenced after the December 13, 2024, applicability date of this Subpart, in a letter dated January 21, 2026, Transco submitted evidence of a contractual obligation to undertake and complete, within a reasonable time, a continuous program of construction or modification that was entered into before the effective date of this Subpart. Therefore, Mainline Unit Nos. 16 and 17 are not subject to this Subpart.

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 either installed prior to the August 23, 2011, applicability date or after the September 18, 2015, applicability date of this regulation; 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 either installed prior to the September 18, 2015, applicability date or after the December 6, 2022, applicability date of this regulation; 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 Mainline Unit Nos. 16 and 17 at this facility commenced construction prior to the December 6, 2022, applicability date of this Subpart. The 2024 turbine modifications did not include any affected stationary sources with requirements related to well sites, natural gas processing plants, reciprocating compressors, or storage vessels with VOC emissions greater than 6 TPY nor methane emissions greater than 20 TPY. The project involved the uprating of existing Solar drivers to the compressors of Mainline Unit Nos. 16 and 17. These drivers are separate affected stationary sources than the compressors, i.e., not integral facilities for purposes of NSPS. The centrifugal compressors were not constructed, modified or reconstructed as part of this project, therefore Subpart OOOOb does not apply to the centrifugal compressors. Since the project was not proposing any construction, modification or reconstruction for any compressors (i.e. the compressor and *not* the driver), and the project did not involve any capital expenditure associated with centrifugal compressors, there were no modifications with respect to centrifugal compressors as part of this project. The turbine driver modifications did not involve any construction, modification, or reconstruction associated with pneumatic devices or compressors; however, the turbine driver modifications (increase the horsepower of the turbine drivers) did result in a net horsepower increase of the turbine drivers and therefore a “modification” of the compressor station. Therefore, Mainline Unit Nos. 16 and 17 are subject to the fugitive emissions components requirements of this Subpart.

According to 40 CFR §60.5365b(i)(3)(ii), Mainline Unit Nos. 16 and 17 are subject to the fugitive emissions components requirements of this Subpart. 40 CFR §60.5370b(a) states Transco must be in compliance with the standards of this Subpart upon startup of the modified turbines. In accordance with 40 CFR §60.5370b(b), Transco is required to, at all times, maintain and operate the affected facility in a manner consistent with good air pollution control practices for minimizing emissions.

Emission Standards and Compliance Requirements

Initial and continuous compliance with the fugitive emissions components requirements are outlined in 40 CFR §60.5410b(k)(1) through (5), and 40 CFR §60.5415b(l)(1) through (4), respectively, in order to achieve compliance with the GHG and VOC standards in 40 CFR §60.5397b. In order to reduce fugitive emissions of methane and VOC, Transco must develop a fugitive emissions monitoring plan as required by 40 CFR §60.5397b(b), (c), and (d), monitor fugitive emissions components as required by 40 CFR §60.5397b(e), conduct an initial monitoring survey as required by 40 CFR §60.5397b(f)(3), conduct periodic monitoring surveys as required by 40 CFR §60.5397b(g)(1)(v), maintain records as specified by 40 CFR §60.5420b(c)(14), repair each identified source of fugitive emissions for each affected facility as required by 40 CFR §60.5397b(h), and submit an annual report for each collection of fugitive emissions components as required by 40 CFR §60.5420b(b)(1) and (9).

Transco may choose to demonstrate compliance with the alternative GHG and VOC standards for fugitive emissions components affected facilities outlined in 40 CFR §60.5398b and the procedures for the submittal and approval of alternative means of emission limitation for GHG and VOC based on work practices for fugitive emissions components outlined in 40 CFR §60.5399b. A notification must be sent to the Administrator of the adoption of the alternative standards in the first annual report following implementation of the alternative standards, as specified in 40 CFR §60.5424b(a). Once the alternative standards have been implemented, Transco would be required to continue to comply with the alternative standards. Transco has elected to not use this alternative method of determining compliance with the standard.

Notification, Reports, and Records

Per 40 CFR §60.5420b(a)(1), owners of the collection of fugitive emissions components at a compressor station affected facility are not required to submit the notifications required in 40 CFR §§60.7(a)(1), (3), and (4) and 40 CFR §60.15(d).

In accordance with 40 CFR §60.5420b(b), the initial annual report required by this Subpart is due no later than 90 days after the end of the initial compliance period as determined by 40 CFR §60.5410b. This date is established upon initial startup. Initial startup of Mainline Unit No. 16 was April 9, 2025. Initial startup of Mainline Unit No. 17 was July 7, 2025. The earlier startup date will be used to determine the due date of the initial annual report; therefore, the initial annual report is due no later than July 8, 2026. Subsequent annual reports are due no later than the same date each year as the initial annual report. Notwithstanding the preceding sentences, no annual report is due before November 30, 2026, on or before which date you must submit all annual reports that were due before November 30, 2026, per the timing specified in the preceding sentence; then subsequent annual reports thereafter are due no later than 90 days after the end of each annual compliance period. 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 (14) of 40 CFR §60.5420b(b). Annual reports may coincide with Title V reports as long as all the required elements of the annual report are included. In accordance with 40 CFR §60.5420b(b)(15), Transco must submit annual reports to the EPA via CEDRI, which is accessed through the EPA's CDX (<https://cdx.epa.gov/>) following the procedures specified in 40 CFR §60.5420b(d).

Transco is required to maintain records under this Subpart as outlined in 40 CFR §60.5420b(c)(14). In accordance with 40 CFR §60.5420b(c)(14)(i), Transco is required to maintain a record of the date of startup or the date of modification for the fugitive emissions components affected facility at a compressor station. 40 CFR §60.5420b(c)(14)(iv) requires Transco to maintain a record of the fugitive emissions monitoring plan as required in 40 CFR §60.5397b(b), (c), and (d). 40 CFR §60.5420b(c)(14)(v) requires Transco to maintain a record of each monitoring survey as specified in paragraphs (c)(14)(v)(A) through (I) of the section. In accordance with 40 CFR §60.5420b(c), Transco is required to maintain records 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.

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)]

On March 5, 2004, EPA promulgated Subpart YYYY. However, EPA stayed Subpart YYYY for gas-fired turbines on August 18, 2004. On March 9, 2022, EPA lifted the stay of effectiveness of the standards for new lean premix and diffusion flame gas-fired turbines. Mainline Unit No. 16 is considered an existing stationary combustion turbine under this rule and is not considered reconstructed as part of the horsepower uprating project due to the capital cost threshold as defined in 40 CFR Part 63, Subpart A. As an existing source, Mainline Unit No. 16 does not have to meet the requirements of this Subpart or Subpart A of this part in accordance with 40 CFR §63.6090(b)4. Mainline Unit No. 17 is considered a new stationary combustion turbine under this rule and is subject to this Subpart.

Emission Limitations

Subpart YYYY regulates emissions of formaldehyde (CH₂O). In accordance with 40 CFR §63.6100, Mainline Unit No. 17 is subject to the emission limitations and operating limitations in Table Nos. 1 and 2 of the Subpart. Transco must comply with a formaldehyde emission limit of 91 ppbv or less at 15% O₂, except during startup as defined in 40 CFR §63.6175, and maintain the operating limitations approved by the Administrator. Transco chose not to install an oxidation catalyst in order to meet the applicable emission limitation in Table 1; therefore, Transco must operate a continuous monitoring system (CMS) and develop and implement an EPA approved written CMS quality control plan. Transco submitted the monitoring plan petition to EPA on June 25, 2022, and received EPA's approval of the plan on January 13, 2023.

Compliance Requirements

Transco demonstrates compliance with the formaldehyde emission limit through performance testing (see *Testing Requirements* section below). 40 CFR §63.6125(b) requires Transco to continuously monitor any parameters specified in the approved petition to the Administrator, in order to comply with the operating limitations in Table 2 and as specified in Table 5 of this Subpart. Therefore, as approved by EPA, Transco continuously monitors the gas producer turbine speed (% NGP) and the inlet ambient air temperature (T₁) in order to confirm the turbine is operating in lean premixed (LPM) combustion mode. Under 40 CFR §63.6105(a) and (c), Transco must comply with the applicable emission limitations, operating limitations, and other requirements of Subpart

YYYY, and must always operate and maintain any affected source in a manner consistent with safety and good air pollution control practices for minimizing emissions.

Testing Requirements

40 CFR §63.6110 requires an initial performance test within 180 calendar days after the compliance date of March 9, 2022 (by September 9, 2022). Prior to their CMS petition being approved by EPA, Transco conducted an initial performance test on August 4, 2022, and demonstrated the unit to be in compliance with the applicable formaldehyde standard. After Transco's CMS plan was approved by EPA on January 13, 2023, a second performance test was conducted on June 22, 2023, and demonstrated the unit to be in compliance with the applicable formaldehyde standard. The most recent performance testing was conducted on July 21, 2025, and demonstrated the unit to be in compliance with the applicable formaldehyde standard. 40 CFR §63.6115 requires subsequent formaldehyde performance tests on an annual basis as specified in Table 3 of this Subpart.

Notification, Reports, and Records

According to 40 CFR §63.6145(c), Transco must submit an Initial Notification no later than 120 calendar days after becoming subject to Subpart YYYY as specified in 40 CFR §63.9(b). Transco's application for the turbine satisfies the initial notification requirement. 40 CFR §63.6145(e) requires Transco to submit a notification of intent to conduct the initial performance test at least 60 calendar days prior to the test as specified in 40 CFR §63.7(b)(1). 40 CFR §63.6145(f) requires Transco to submit a Notification of Compliance Status according to 40 CFR §63.9(h)(2)(ii) for each performance test required to demonstrate compliance with the emission limitation for formaldehyde, including the performance test results, before the close of business on the 60th calendar day following the completion of the performance test.

40 CFR §63.6150(a) requires Transco to submit a semiannual compliance report (SCR) according to Table 6 of the Subpart. The SCR must also include the excess emissions and monitoring system performance reports required by 40 CFR §63.10(e)(3). 40 CFR §63.6150(b) states semiannual compliance reports should be submitted by July 31st and January 31st, for the reporting periods of January 1st through June 30th and July 1st through December 31st, respectively. 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 (<https://cdx.epa.gov/>).

In accordance with 40 CFR §63.6160, 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. Transco must retain records of the most recent two years on site. Records of the remaining three years may be retained off site.

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)]

All of the stationary reciprocating internal combustion engines (RICE) at the facility are affected sources under this Subpart. Under this Subpart, Mainline Unit Nos. 1-15 are classified as existing

2SLB SI RICE with a site rating of more than 500 hp at a major source of HAP. In accordance with 40 CFR §63.6590(b)(3)(i), Transco does not have to meet the requirements of this Subpart or Subpart A for these RICE.

Auxiliary Unit Nos. 1-3 are each classified as existing 4SLB SI emergency RICE with a site rating of less than 500 hp at a major source of HAP. In accordance with 40 CFR §63.6595(a)(1), Transco is required to meet the requirements of this Subpart and Subpart A for these RICE.

Compliance Requirements

These engines are being operated as emergency units; therefore, in accordance with 40 CFR §63.6640(f), to retain the emergency classification, these engines must be limited to operating during:

- Emergency situations;
- Maintenance checks and readiness testing, not to exceed 100 hours per year; and
- Non-emergency situations, not to exceed 50 hours per year (those 50 hours are counted towards the 100 hours per year provided for maintenance and testing)

According to 40 CFR §63.6602, any existing stationary RICE with a site rating of equal to or less than 500 brake hp located at a major source of HAP emissions must comply with applicable emission limitations and other requirements in Table 2c of Subpart ZZZZ.

According to Table 2c, Item 6, existing emergency SI RICE are subject to the following work practice requirements:

- Change oil and filter every 500 hours of operation or within one year plus 30 days of the previous change, whichever comes first; or participate in the oil analysis program as allowed by 40 CFR §63.6625(j);
- Inspect spark plugs every 1,000 hours of operation or within one year plus 30 days of the previous inspection, whichever comes first, and replace as necessary; and
- Inspect all hoses and belts every 500 hours of operation or within one year plus 30 days of the previous inspection, whichever comes first, and replace as necessary.

40 CFR §63.6625(e)(2) and Table 6, Item 9, requires each of these units be operated and maintained according to the manufacturer's written instructions or develop and follow a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practices for minimizing emissions. 40 CFR §63.6625(f) requires the installation of a non-resettable hour meter if one is not already installed.

Testing Requirements

According to Tables 4 and 5 of the Subpart, no initial or subsequent performance testing is required for these emergency engines.

Notification, Reports, and Records

According to 40 CFR §63.6655(e)(2), Transco must keep records of the maintenance conducted on the existing emergency stationary RICE in order to demonstrate that they operated and maintained the stationary RICE and after-treatment control device (if any) according to their own maintenance plan. 40 CFR §63.6655(f)(1), requires Transco to keep records of the hours of operation of each engine that is recorded through the non-resettable hour meter. Transco must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

Auxiliary Unit No. 4 is classified as a new 4SLB emergency SI RICE with a site rating of more than 500 hp at a major source of HAP. In accordance with 40 CFR §63.6590(b)(1)(i), new emergency stationary RICE with a site rating of more than 500 hp located at a major source of HAP emissions that does not operate or is not contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in 40 CFR §63.6640(f)(2)(ii) and (iii), does not have to meet any requirements of this Subpart and of Subpart A except for the initial notification requirements of 40 CFR §63.6645(h). The application to construct this unit satisfied the initial notification requirement.

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 in accordance with 40 CFR §98.2(a)(3) 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 short tons) 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 engines and turbines are 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-.03, “Control of Particulate Emissions: Fuel Burning Equipment”

Although the engines 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 would not be 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 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.

ADEM Admin. Code r. 335-3-8-.04, “Standards for Stationary Reciprocating Internal Combustion Engines”

This facility operates internal combustion engines and is located in Randolph County, which is one of the affected counties under the NO_x SIP Call Phase II Rule. This facility has engines that meet the Rule’s definition of a large internal combustion engine (MLU Nos. 1-6, and 8-15); therefore, this facility has installed HPFi technology on MLU Nos. 1-12 and 14-15 in order to achieve compliance with the required NO_x reductions.

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 ozone season NO_x emission limits for Mainline Unit Nos. 1 through 12, should an engine operate for production during an ozone season, emission testing is required to be conducted for NO_x during the ozone season or within the six-month period preceding the first day of the start of ozone season in accordance with ADEM Admin. Code r. 335-3-8-.04(6)(a). Ozone season emission testing may be conducted using an approved EPA Reference Method. Initial compliance testing for these units was conducted in October 2006 to determine compliance with the ozone season NO_x emission limits. The most recent performance testing conducted on August 5-7, 2025, for Mainline Unit Nos. 1 through 12 demonstrated compliance with each of the applicable standards.

To monitor compliance with the applicable PSD synthetic minor source NO_x emission limits for Mainline Unit Nos. 14, 15, 16, and 17, and to satisfy the periodic monitoring requirement, emission testing is required twice per calendar year at a frequency of once per semiannual period (Jan 1st-Jun 30th and Jul 1st-Dec 31st) during which a unit operates for the purposes of production (i.e. the compression/transmission of natural gas), with a minimum of three (3) calendar months elapsing between tests. The first emissions test conducted following the issuance of this renewal permit must be conducted using an approved US EPA Reference Method. If results from the performance test are less than or equal to 75% of the emission limit, then the frequency of subsequent performance tests may be reduced from a semiannual to an annual basis, with no more than fourteen (14) months elapsing between tests. If the results of any subsequent performance test

exceed 75% of the emission limit, then semiannual performance testing must resume until the unit shows compliance for two consecutive testing events demonstrating emissions are less than or equal to 75% of the emission limit, at which time annual testing may resume. The most recent performance testing conducted on June 3, 2025, for Mainline Unit No. 14, December 9, 2025, for Mainline Unit No. 15, August 6, 2025, for Mainline Unit No. 16, and August 5, 2025, for Mainline Unit No. 17, demonstrated compliance with each of the applicable standards.

To monitor compliance with the applicable 40 CFR Part 60, Subpart KKKK NO_x emission limit for Mainline Unit Nos. 16 and 17, 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. 16 and 17, 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 40 CFR Part 60, Subpart KKKK. No periodic monitoring would be required if a unit does not operate for production purposes during the annual testing period. The most recent performance testing conducted on August 6, 2025, for Mainline Unit No. 16, and August 5, 2025, for Mainline Unit No. 17, demonstrated compliance with each of the applicable standards.

To monitor compliance with the applicable 40 CFR Part 63, Subpart YYYY formaldehyde emission limit for Mainline Unit No. 17, and to satisfy the periodic monitoring requirement, Transco is required to conduct formaldehyde performance tests on an annual basis during which the unit operates for the purposes of production (i.e. the compression/transmission of natural gas). No periodic monitoring is required if the unit does not operate for production purposes during the annual testing period. The most recent performance testing conducted on July 21, 2025, for Mainline Unit No. 17, demonstrated compliance with the applicable standard.

To demonstrate compliance with the SO₂ standard in 40 CFR Part 60, Subpart KKKK, for Mainline Unit Nos. 16 and 17, Transco must continue to demonstrate the fuel meets the definition of natural gas in 40 CFR §60.4365(a), as per Transco's FERC Natural Gas Tariff.

To monitor compliance with the applicable 40 CFR Part 60, Subpart JJJJ NO_x, CO, and VOC emission limits for Auxiliary Unit No. 4, 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. The most recent performance testing conducted on May 18, 2023, for Auxiliary Unit No. 4, demonstrated compliance with each of the applicable standards.

Recordkeeping and Reporting

In addition to the recordkeeping and reporting required to comply with 40 CFR Part 63, Subpart YYYY for Mainline Unit No. 17, with 40 CFR Part 63, Subpart ZZZZ for Auxiliary Unit Nos. 1-

3, with 40 CFR Part 60, Subpart JJJJ for Auxiliary Unit No. 4, and with 40 CFR Part 60, Subpart OOOOb for Mainline Unit Nos. 16 and 17, as part of the Semiannual Monitoring Report, Transco would be 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 would also be required to include a statement addressing whether a unit operated for production purposes during the respective reporting period. Transco would be 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 would be 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. 16 and 17.

ADEM Admin. Code r. 335-3-8-.04 specifies recordkeeping and reporting requirements for sources subject to Phase II of the NO_x SIP Call. For Mainline Units 1-12, Transco would be required to maintain the following records for each unit for each ozone season (May 1-Sept. 30): identification and location of the unit, calendar date of record, number of hours operated during the ozone season, type and quantity of fuel used during the ozone season, date and results of each emission-related inspection and a summary of any emissions-related maintenance, results of all emission tests, and any additional information described in Transco's Phase II NO_x SIP Call Compliance Plan. These records must be compiled into a form suitable for inspection within 30 days of the end of each ozone season and must be retained for a period of five years from the date of generation of each record.

In accordance with ADEM Admin. Code r. 335-3-16-.05(c)2.(ii), all required records must 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.

Mainline Unit Nos. 1-15 (reciprocating engines) are the only emission units at the facility that emit greater than 100 TPY of any criteria pollutant; however, none of these units employ active control devices 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 (308-0014) 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.

Andrea Escalante

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Chemical Branch
Natural Resources Section
Agriculture/Gas Unit
Air Division

March 23, 2026

Date

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