STATEMENT OF BASIS
TRANSCONTINENTAL GAS PIPE LINE COMPANY, LLC
STATION 105
ROCKFORD, COOSA COUNTY, ALABAMA
FACILITY NO. 306-0009
SIGNIFICANT MODIFICATION

This proposed significant modification 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 (Transco) Station 105 compressor station was originally constructed/began operations in 1997. The initial MSOP was issued on March 15, 2000. The current fifth renewal MSOP was issued on January 13, 2025, became effective on March 15, 2025, and is scheduled to expire on March 14, 2030. This is the first significant modification to the fifth renewal MSOP. The Department received the initial application for this permit modification on March 17, 2026, and deemed a complete application on March 18, 2026.

The facility is located in Coosa 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 AL0000000103700009).

Facility Operations

Transcontinental Gas Pipe Line Company, LLC (Transco) operates a compressor station for the transmission of pipeline natural gas (SIC 4922) located in Rockford, Coosa 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-related activities and upset/emergency situations. Significant sources of air pollutants at this facility include:

Emission Unit Nos. 001 – 002: Two (2) 16,245 hp Solar Mars 100-T15000S Natural Gas-fired Combustion Turbines (Mainline Unit Nos. 1 - 2);

Emission Unit No. 003: One (1) 515 hp Caterpillar G3412 4-stroke, Lean Burn (4SLB) Natural Gas-fired Emergency Reciprocating Engine (Auxiliary Unit No. 1);

Emission Unit No. 005: One (1) 16,448 hp Solar Mars 100-T15000S Natural Gas-Fired Combustion Turbine (Mainline Unit No. 3);

Emission Unit No. 006: One (1) 20,535 hp Solar Titan 130-20502S Natural Gas-fired Combustion Turbine (Mainline Unit No. 4); and

Emission Unit No. 007: One (1) 1,060 hp Waukesha P48GL 4-Stroke, Lean Burn (4SLB) Natural Gas-

fired Emergency Reciprocating Engine (Auxiliary Unit No. 2)

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

Proposed Changes

This draft MSOP includes the following changes to the current MSOP:

- Incorporation of requirements of Air Permit No. X009 for the addition of a 1,680 hp Waukesha Model L7044GSI, 4-stroke rich-burn (4SRB), natural gas-fired auxiliary reciprocating internal combustion engine (RICE) equipped with non-selective catalytic reduction (NSCR) [Auxiliary Unit No. 3 (AUX 3)] as Emission Unit No. 008.

- Incorporation of requirements of Air Permit No. X010 for the addition of an 11,445 hp Solar Taurus Model 70-10802S, natural gas-fired combustion turbine equipped with dry low NO_x combustion [Mainline Unit No. 5 (MLU 5)] as Emission Unit No. 009.

Transco was issued Air Permit No. X009 on February 1, 2023, for Emission Unit No. 008 (AUX 3). The Air Permit application submitted for this permitting action may be found in ADEM's eFile system on the Department's website (www.adem.alabama.gov). Temporary Authorization to Operate (TAO) was issued on March 17, 2025. An extension to the TAO was issued on September 17, 2025. After an inspection was conducted by Air Division personnel on July 25, 2025, and after successfully completing a compliance test conducted on September 10, 2025, which demonstrated compliance with the applicable emission standards, Authorization to Operate was granted to Transco on November 17, 2025.

Transco was issued Air Permit No. X010 on October 9, 2024, for Emission Unit No. 009 (MLU 5). The Air Permit application submitted for this permitting action may be found in ADEM's eFile system on the Department's website (www.adem.alabama.gov). Temporary Authorization to Operate was issued on March 17, 2025. An extension to the TAO was issued on September 17, 2025. After an inspection was conducted by Air Division personnel on July 25, 2025, and after successfully completing a compliance test conducted on August 12, 2025, which demonstrated compliance with the applicable emission 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* X001 - MLU 1 - (new) - NO_x SMS** emission limit established	November 25, 1996	--	--	--	N
AP X002 - MLU 1 - uprate hp, increase NO_x SMS emission limit, establish CO SMS emission limit	October 25, 1999	--	--	--	N
AP X003 - MLU 2 - (new) - NO_x and CO SMS emission limits established	October 25, 1999	--	--	--	N

AP X004 - AUX 1 - (existing) - SMS hours limit established	October 25, 1999	--	--	--	N
Initial Title V MSOP	March 15, 2000	March 15, 2000	March 14, 2005	--	--
AP X005 - MLU 3 - (new) - NO_x and CO SMS emission limits established	August 29, 2001	--	--	--	N
1st Title V MSOP Renewal	January 25, 2005	March 15, 2005	March 14, 2010	Administrative Amendment - February 26, 2009 - Name change	--
2nd Title V MSOP Renewal	February 16, 2010	March 15, 2010	March 14, 2015		--
AP X006 - MLU 4 (new)	April 22, 2015	--	--	--	N
AP X007 - AUX 2 (new)	September 10, 2015	--	--	--	N
3rd Title V MSOP Renewal	May 27, 2015	May 27, 2015	March 14, 2020	Significant Modification - July 3, 2018 - Incorporate AP Nos. X006 and X007	--
4th Title V MSOP Renewal	January 7, 2020	March 15, 2020	March 14, 2025	--	--
***AP X008 - MLU 5 (new)	February 1, 2023	--	--	--	N
AP X009 - AUX 3 (new)	February 1, 2023	--	--	--	N
AP X010 - MLU 5 (new) Re-issuance of AP X008	October 9, 2024	--	--	--	N
5th Title V MSOP Renewal	January 13, 2025	March 15, 2025	March 14, 2030	--	--

*AP = Air Permit
**SMS = PSD Synthetic Minor Source
***AP X008 was re-issued as AP X010 on October 9, 2024, and is therefore void as of this same date

Plant-Wide Potential to Emit (PTE)

Pollutant	PTE (TPY)
$PM/PM_{10}/PM_{2.5}$	19.30
NO_x	313.24
CO	344.88
SO_2	9.28
VOC	37.75
50000 (Formaldehyde)	3.37
Total HAP	5.40
CO_2e	323,609.00

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 is a major source under PSD regulations because the facility-wide potential emissions of NO_x and CO each exceed 250 TPY. EU No. 008 (AUX 3) is not subject to any synthetic minor source emission limitations under PSD. EU No. 009 (MLU 5) is subject to a PSD synthetic minor source NO_x emission limitation of 3.08 lb/hr or 9 ppmvd at 15% O_2 that was established at the time of its installation to limit the PTE below the PSD significant emission rates (SER) because using the applicable 40 CFR Part 60, Subpart KKKK NO_x emission limit of 25 ppmvd at 15% O_2 caused the potential NO_x emissions from the turbine to exceed the 40 TPY 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)]

EU No. 009 (MLU 5) commenced construction after both of the Subpart GG applicability dates of October 3, 1977, and February 18, 2005; therefore, it is not subject to this Subpart and is subject to 40 CFR Part 60, Subpart KKKK, Standards of Performance for Stationary Gas Turbines (Subpart KKKK) as discussed below.

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)(i), EU No. 008 (AUX 3) is subject to this Subpart since it was ordered after June 12, 2006, and manufactured after July 1, 2007, for engines with a maximum engine power greater than or equal to 500 hp, the applicability dates for this Subpart. It is classified as a non-emergency, spark ignition (SI), 4-stroke rich-burn (4SRB), internal combustion engine (ICE) greater than or equal to 500 hp.

Emission Limitations

In accordance with 40 CFR §60.4233(e) and Table 1 to Subpart JJJJ, AUX 3 is subject to a NO_x emission limit of 1.0 g/hp-hr or 82 ppmvd at 15% O_2, a CO emission limit of 2.0 g/hp-hr or 270 ppmvd at 15% O_2, and a VOC emission limit of 0.7 g/hp-hr or 60 ppmvd at 15% O_2. According to 40 CFR §60.4234, Transco must operate and maintain the engine in a manner that meets these emission standards over the entire life of the engine.

AUX 3 is not certified by the manufacturer to meet the applicable emission standards of Subpart JJJJ and requires the use of an add-on control device to meet the applicable standards. Transco equipped this engine with an NSCR control device in order to meet the applicable emission standards.

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 AUX 3 is not certified, Transco must keep a maintenance plan, records of maintenance conducted on the engine, and, to the extent practicable, must maintain and operate the engine in a manner consistent with good air pollution control practices for minimizing emissions.

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. Transco has not indicated any plan to use propane as a fuel source for this unit.

40 CFR §60.4243(g) states that it is expected that air-to-fuel ratio (AFR) controllers will be used with the operation of three-way catalysts/non-selective catalytic reduction control devices. The AFR controller must be maintained and operated appropriately in order to ensure proper operation of the engine and control device to minimize emissions at all times.

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 September 10, 2025, for AUX 3 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. Also, 40 CFR §60.4245(c) requires that owners and operators of stationary SI ICE greater than 500 hp submit an initial notification as required in 40 CFR §60.7(a)(1). Transco's initial application for AUX 3 served as their initial notification. 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, Transco 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/*).

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

EU No. 009 (MLU 5) has a heat input at peak load greater than 10 MMBtu/hr and commenced construction after February 18, 2005, and prior to December 13, 2024, the applicability dates for this rule; therefore, it is subject to this Subpart. It is 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 SO_2. In accordance with 40 CFR §60.4320(a) and Table 1 to Subpart KKKK, MLU 5 is subject to a NO_x emission limit of 25 ppmvd at 15% O_2 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% O_2 on a dry basis. In accordance with 40 CFR §60.4330(a), Transco is subject to an SO_2 emission limit in which the turbine may not burn any fuel which contains total potential SO_2 emissions in excess of 26 ng SO_2/J (0.060 lb SO_2/MMBtu) heat input, or discharge into the atmosphere any gases which contain SO_2 in excess of 0.90 lb/MWh (110 ng/J) gross output. Transco has elected to comply with the SO_2 emission limit in which the turbine may not burn any fuel which contains total potential SO_2 emissions in excess of 26 ng SO_2/J (0.060 lb SO_2/MMBtu) heat input. MLU 5 is subject to a synthetic minor emission limit of 3.08 lb/hr or 9 ppmvd at 15% O_2 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 the PSD SMS emission limitation for NO_x, Transco will demonstrate compliance with the applicable emission standard under Subpart KKKK. Transco complies with the SO_2 emission standard by burning fuel with a total sulfur content less than 1.0 gr/scf (0.003 lb SO_2/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 SO_2/J (0.060 lb SO_2/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). The

initial performance test for MLU 5 was conducted on August 12, 2025, and demonstrated compliance with the applicable NO_x standard. Per 40 CFR §60.4340(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)(1) 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. The most recent performance testing conducted on March 5, 2026, for MLU 5 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(e) states that beginning on March 16, 2026, within 60 days after the date of completing each performance test, Transco must submit the results following the procedures specified in 40 CFR §60.4375(g). 40 CFR §60.4375(g) requires all reports to EPA 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/*).

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.* Since EU No. 009 (MLU 5) commenced construction prior to the December 13, 2024, applicability date, it 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 compressor associated with MLU 5 at this facility commenced construction after the December 6, 2022, applicability date of 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); therefore, this facility would be subject to this Subpart.

Since AUX 3 is a reciprocating engine that drives an electric generator package (i.e., no gas transmission compressor package), AUX 3 does not trigger applicability under Subpart OOOOb. The collection of fugitive emissions components at the station makes it an affected facility for the fugitive emissions

components requirements of this Subpart. MLU 5 is also subject to the requirements associated with new centrifugal compressor dry seals under this Subpart.

OOOOb - Fugitive Emissions Components Requirements

According to 40 CFR §60.5365b(i)(3)(i), the facility is 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 MLU 5. 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)(2), 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 of MLU 5. Initial startup of MLU 5 was April 1, 2025; therefore, the initial annual report is due no later than June 30, 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). 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). Annual reports may coincide with Title V reports as long as all the required elements of the annual report are included. Transco has elected to submit the required annual report based on a calendar year (January 1st – December 31st) compliance period. In order to do so, Transco submitted the initial annual report early on March 31, 2026, with a shortened initial compliance period of April 1, 2025, through December 31, 2025. Therefore, subsequent annual reports are due no later than March 31st each year.

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.

OOOOb - Centrifugal Compressor Dry Seal Requirements

According to 40 CFR §60.5365b(b), MLU 5 is subject to the centrifugal compressor dry seal requirements of this Subpart. In accordance with 40 CFR §60.5370b(a)(7), Transco must be in compliance with the standards of this Subpart upon startup of MLU 5. Transco is required to, at all times, including periods of startup, shutdown, and malfunction, maintain and operate the affected facility in a manner consistent with good air pollution control practices for minimizing emissions as required by 40 CFR §60.5370b(b).

Emission Standards and Compliance Requirements

Initial and continuous compliance with the centrifugal compressor dry seal requirements are outlined in 40 CFR §60.5410b(d)(6) through (8), and 40 CFR §60.5415b(d)(2) through (4), respectively, in order to achieve compliance with the GHG and VOC standards. In order to reduce emissions of methane and VOC, Transco must comply with the standards in 40 CFR §60.5380b(a)(6) through (8). 40 CFR §60.5380b(a)(6) states Transco must comply with the GHG and VOC requirements specified in (a)(6)(i) through (iii) of this section using volumetric flow rate as a surrogate. Volumetric flow rate must be determined in accordance with 40 CFR §60.5380b(a)(7)(iii). In accordance with 40 CFR §60.5380b(a)(6)(i), the volumetric flow rate per seal must not exceed 10 standard cubic feet per minute (scfm) per seal. If the individual seals are manifolded to a single open-ended vent line, the volumetric flow rate must not exceed the sum of the individual seals multiplied by 10 scfm. Transco indicated in the initial application for MLU 5 that it has two dry gas seals that are manifolded to a single open-ended vent line. If the volumetric flow rate, measured in accordance with paragraph (a)(7)(iii) of this section exceeds 10 scfm multiplied by the number of dry seals connected to the vent, the seals connected to the measured vent must be repaired as provided in paragraph (a)(8) of this section. In accordance with 40 CFR §60.5380b(a)(6)(ii), the first volumetric flow rate measurement from the centrifugal compressor equipped with a dry seal must be conducted on or before 8,760 hours of operation after startup. In accordance with 40 CFR §60.5380b(a)(6)(iii), subsequent volumetric flow rate measurements from the centrifugal compressor equipped with dry seals must be conducted on or before 8,760 hours of operation after the previous measurement which demonstrates compliance with the 10 scfm volumetric flow rate per seal. If the individual seals are manifolded to a single open-ended vent line, the volumetric flow rate

must not exceed the sum of the individual seals multiplied by 10 scfm. Transco indicated in the initial application for MLU 5 that it has two dry gas seals that are manifolded to a single open-ended vent line. In accordance with 40 CFR §60.5380b(a)(8), the seal must be repaired within 90 calendar days after the date of a volumetric emissions measurement that exceeds the applicable required flow rate per seal. A follow-up of volumetric flow rate measurements from seal vents using the methods specified in paragraph (a)(7)(iii) of this section must be conducted within 15 days after a repair to document that the rate has been reduced to less than the applicable required flow rate per seal. If the individual seals are manifolded to a single open-ended vent line or vent, the volumetric flow rate must be reduced to less than the sum of the individual seals multiplied by the applicable required flow rate per seal specified in paragraph (a)(4) through (6) of this section, as applicable. Transco indicated in the initial application for MLU 5 that it has two dry gas seals that are manifolded to a single open-ended vent line.

Transco may choose to demonstrate compliance with the alternative GHG and VOC standards for centrifugal compressor dry seal affected facilities outlined in 40 CFR §60.5380b(a)(9)(i) and (ii), or (a)(9)(iii) and the procedures for the submittal and approval of alternative means of emission limitation for GHG and VOC based on work practices for centrifugal compressor dry seal affected facilities outlined in 40 CFR §60.5399b. Transco has elected not to demonstrate compliance with any of these alternative standards or operating scenarios.

Test Methods and Procedures

Per 40 CFR §60.5380b(a)(7)(iii), Transco must determine the volumetric flow rate from the centrifugal dry seal compressor as specified in paragraph (a)(7)(iii)(A) of this section using one of the methods specified in paragraphs (a)(7)(iii)(A)(1) through (3) of this section.

Notification, Reports, and Records

Per 40 CFR §60.5420b(a)(1), owners of centrifugal compressors 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 of MLU 5. Initial startup of MLU 5 was April 1, 2025; therefore, the initial annual report is due no later than June 30, 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). 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). Annual reports may coincide with Title V reports as long as all the required elements of the annual report are included. Transco has elected to submit the required annual report based on a calendar year (January 1st – December 31st) compliance period. In order to do so, Transco submitted the initial annual report early on March 31, 2026, with a shortened initial compliance period of April 1, 2025, through December 31, 2025. Therefore, subsequent annual reports are due no later than March 31st each year.

Transco is required to maintain records required by this Subpart for centrifugal compressors as outlined in 40 CFR §60.5420b(c)(4). In accordance with 40 CFR §60.5420b(c)(4)(i), Transco is required to maintain records of deviations in cases where the centrifugal compressor was not operated in compliance with the requirements specified in 40 CFR §60.5380b, including a description of each deviation, the date and time each deviation began and the duration of each deviation. 40 CFR §60.5420b(c)(4)(iii) requires Transco to maintain the records specified in paragraphs (c)(4)(iii)(A) through (H) of the section. In accordance with 40 CFR §60.5420b(c), 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.

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

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)]

EU No. 008 (AUX 3) 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 stationary RICE located at an area source of HAP emissions must meet the requirements of the RICE MACT by meeting the requirements of 40 CFR Part 60, Subpart JJJJ. No further requirements apply to AUX 3 under Subpart ZZZZ.

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, EU No. 009 (MLU 5) is not an affected source under this Subpart.

Mandatory Greenhouse Gas Reporting

40 CFR Part 98, Subpart A General Provision

While the incorporation of EU No. 008 (AUX 3) and EU No. 009 (MLU 5) into the MSOP through this significant modification are not directly subject to this rule, they are combustion sources that contribute to the aggregate maximum heat input total for the facility, which requires reporting under this rule. 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 CO_2e 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 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"

EU No. 008 (AUX 3) and EU No. 009 (MLU 5) 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 EU No. 008 (AUX 3) and EU No. 009 (MLU 5) 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 EU No. 008 (AUX 3) and EU No. 009 (MLU 5) 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 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 PSD synthetic minor source NO_x emission limit for EU No. 009 (MLU 5) and to satisfy the periodic monitoring requirement, emission testing is required twice per calendar year at a frequency of once per semiannual period (January 1st - June 30th and July 1st - December 31st) during which the 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 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 March 5, 2026, for MLU 5, demonstrated compliance with the applicable standard and the results were less than 75% of the emission

limit. No periodic monitoring would be required if the unit does not operate for production purposes during the applicable testing period.

To determine compliance with the applicable 40 CFR Part 60, Subpart KKKK NO_x emission limit for EU No. 009 (MLU 5), 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. The most recent performance testing conducted on March 5, 2026, for MLU 5, demonstrated compliance with the applicable standard and the results were less than 75% of the emission limit. Since MLU 5 is subject to a synthetic minor emission limit of 3.08 lb/hr or 9 ppmvd at 15% O_2 for NO_x based on manufacturer's data in order to remain below the PSD SER level for NO_x, demonstrating compliance with the PSD synthetic minor source emission limitation for NO_x will demonstrate compliance with the applicable emission standard under Subpart KKKK, and will satisfy the periodic monitoring requirement for MLU 5.

To determine compliance with the applicable 40 CFR Part 60, Subpart KKKK SO_2 standard for EU No. 009 (MLU 5), 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 EU No. 008 (AUX 3), 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 September 10, 2025, for AUX 3, demonstrated compliance with each of the applicable standards.

To monitor compliance with the 40 CFR Part 60, Subpart OOOOb standards, Transco is required to 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), and must conduct periodic monitoring surveys as required by 40 CFR §60.5397b(g). Transco is also required to determine the volumetric flow rate from the centrifugal compressor equipped with dry seals in accordance with 40 CFR §60.5380b(a)(7)(iii). In accordance with 40 CFR §60.5380b(a)(6)(ii), the first volumetric flow rate measurement from the centrifugal compressor equipped with a dry seal must be conducted on or before 8,760 hours of operation after startup. In accordance with 40 CFR §60.5380b(a)(6)(iii), subsequent volumetric flow rate measurements from the centrifugal compressor equipped with dry seals must be conducted on or before 8,760 hours of operation after the previous measurement which demonstrates compliance with the 10 scfm volumetric flow rate per seal. If the individual seals are manifolded to a single open-ended vent line, the volumetric flow rate must not exceed the sum of the individual seals multiplied by 10 scfm. Transco indicated in the initial application for EU No. 009 (MLU 5) that it has two dry gas seals that are manifolded to a single open-ended vent line.

Recordkeeping and Reporting

In addition to the recordkeeping and reporting required to comply with 40 CFR Part 60, Subpart JJJJ for EU No. 008 (AUX 3), and with 40 CFR Part 60, Subpart OOOOb for EU No. 009 (MLU 5), 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 each 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 MLU 5.

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.

EU No. 008 (AUX 3) employs a control device to achieve compliance with an emission limitation or standard and the engine has potential pre-control device emissions that exceed 100 TPY of NO_x and CO (40 CFR §64.2). The post-control emissions from AUX 3 do not equal or exceed 100 percent of the amount, in tons per year, required for a source to be classified as a major source; therefore, in accordance with 40 CFR §64.5(b), a CAM plan is required as part of the next Title V MSOP renewal application.

Public Participation

A 30-day public comment period and a 45-day EPA review period are required prior to the issuance of this significant modification to the current MSOP.

Recommendation

Based on the above analysis, I recommend that Transcontinental Gas Pipe Line Company, LLC's Title V MSOP (306-0009) be modified 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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Date

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