

**STATEMENT OF BASIS
SOUTHERN NATURAL GAS COMPANY, LLC
GALLION COMPRESSOR STATION
GALLION, HALE COUNTY, ALABAMA
FACILITY NO. 406-0003**

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

The facility was originally constructed/began operations in 1951. The initial application for this renewal was received June 5, 2026, and the application was deemed complete on September 23, 2026. The initial MSOP was issued on December 14, 2001, and this is the fifth renewal. The current MSOP was issued on October 18, 2021, became effective on December 14, 2021, and is scheduled to expire on December 13, 2026.

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

There are no current or ongoing enforcement actions against Southern Natural Gas Company, LLC (SNGC) 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 AL0000000106500003).

Facility Operations

SNGC operates a compressor station that is designed to transport natural gas along the pipeline by compressing natural gas to increase the pressure in the pipeline and maintain the downstream flow. The significant sources of air pollutants at this facility include: two 1,960 hp Worthington UTC-167 2-stroke, lean-burn, natural gas-fired engines (Emission Unit Nos. 001 and 002/SNGC Engine Nos. C004 and C005); one 1,750 hp Worthington SUTC-7 2-stroke, lean-burn, natural gas-fired engine (Emission Unit No. 003/SNGC Engine No. C006); two 4,000 hp Dresser Rand engine (Emission Unit Nos. 004 and 005/SNGC Engine Nos. C008 and C009); one 751 hp Caterpillar 4-stroke, rich-burn, natural gas-fired emergency generator engine (Emission Unit No. 006/SNGC No. G003); and one 0.25 MMBtu/hr Silvalls SB-16-6, natural gas-fired fuel gas heater (Fuel Gas Heater No. 1). Insignificant emission sources at this station include one 9,995-gallon lubricating oil tank; two 500-gallon used oil tanks; one 2,000-gallon condensate tank; one electric air compressor; one natural gas-fired space heater; and natural gas-fired water heaters.

Proposed Changes

There have been no modifications to or additions of significant emission sources at this facility since the issuance of the fourth renewal MSOP. However, SNGC has requested the 751 hp Caterpillar 4-stroke, lean-burn, natural gas-fired emergency generator engine (Emission Unit No. 006/SNGC No. G003), air/fuel mix be updated from lean-burn to rich-burn to correct the previously misidentified engine specification. The engine description will be administratively amended to 751 hp Caterpillar 4-stroke, rich-burn, natural gas-fired emergency generator engine

(Emission Unit No. 006/SNGC No. G003) with the issuance of this MSOP renewal.

Permit History

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

Issuance No./Permit No.	Limit(s) Established	Issuance Date	Effective Date	Expiration Date	PSD SER Exceeded (Y/N)
Installation of (5) 1,960 hp RICE, (1) 1,750 hp RICE, and (1) 2,500 hp turbine	--	1952 (Unpermitted)	--	--	--
Air Permit X001 - 4,000 hp RICE	NO _x limits established as PSD BACT limits	May 26, 1981	--	--	Y
Air Permit X002 - 4,000 hp RICE. Replaced 2,500 hp turbine	Re-established NO _x and CO limits established as PSD BACT limits	February 19, 1988	--	--	N
Air Permit X002 reissued for Engine No. 9	Re-established NO _x and CO limits established as PSD BACT limits and included VOC limit established as PSD BACT limit.	June 19, 2001	--	--	Y
Initial MSOP	--	December 14, 2001	December 14, 2001	December 13, 2006	--
MSOP 1 st Renewal	--	December 19, 2006	December 19, 2006	December 13, 2011	--
Non-app issued for removing (2) 306 hp emergency RICE to be replaced by one 751 hp emergency RICE.	--	December 20, 2006	--	--	N
Significant Modification to remove two 306 hp emergency generator engines and replace them with one 751 hp Caterpillar emergency generator engine (C010)	PSD SMS limit of 500 hr/yr operational limit	August 20, 2007	August 20, 2007	December 13, 2011	
MSOP 2 nd Renewal	--	December 13, 2011	December 14, 2011	December 13, 2016	---
MSOP 3 rd Renewal - Added fuel gas heater (FGH1)	--	November 10, 2016	December 14, 2016	December 13, 2021	N
MSOP 4 th Renewal	--	October 18, 2021	December 14, 2021	December 13, 2026	--

Plant-Wide Potential to Emit (PTE)

Pollutant	Potential Emissions (TPY)
PM	26.03
SO ₂	0.32
NO _x	1,667.99
CO	392.98
VOC	149.72
CO ₂ e	63,299.74
HAP $\geq$ 10 TPY (50000)	29.70
HAP (Total)	44.80

Applicability: State Regulations

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

The five engines, one emergency engine, and one fuel gas heater 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”

The facility is located in Hale County, which is classified as a Class II County for particulate emissions. However, in accordance with ADEM Admin. Code r. 335-3-4-.03(4), new sources (built after January 18, 1972) are subject to the rules and regulations for Class I Counties regardless of their location. Although the five engines and one emergency engine are fuel combustion sources, they are not subject to any particulate matter (as TSP) emission limitation of ADEM Admin. Code r. 335-3-4-.03, because they do not meet the definition of fuel burning equipment. The fuel gas heater is considered fuel-burning equipment and is subject to the State particulate matter emission standard in ADEM Admin. Code r. 335-3-4-.03(1) and is subject to the applicable emission standard for a new source as calculated by the equation $E = 1.38H^{-0.44}$, where E = emissions in lb/million BTU and H = heat input in millions of BTU/hr. The fuel gas heater is exclusively fired with natural gas; therefore, it is expected to be able to comply with this standard.

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

The facility is located in Hale County, which is classified as a Category II County for sulfur oxide emissions. Although the five engines and one emergency engine are fuel combustion sources, they are not subject to any sulfur dioxide (SO₂) emission limitation of ADEM Admin. Code r. 335-3-5-.01, because they do not meet the definition of fuel burning equipment. The fuel gas heater is considered fuel-burning equipment and is subject to the State SO₂ emission standard in ADEM

Admin. Code r. 335-3-5-.01(1)(b) and is subject to the applicable emission standard of 4.0 pounds per million BTU heat input. The fuel gas heater is exclusively fired with natural gas; therefore, it is expected to be able to comply with this standard.

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 Hale County, which is one of the affected counties under the NO_x SIP Call Phase II Rule. This facility has an engine that meets the Rule’s definition of a large internal combustion engine, Emission Unit No. 005 (Engine No. C009), a 4,000 hp Dresser Rand TCVA-10 2SLB natural gas-fired engine. In June 2003, SNGC removed Emission Unit Nos. C001, C002, and C003, two 1,960 hp Worthington natural gas-fired RICE and one 1,750 hp Worthington natural gas fired RICE, respectively, and replaced the three engines with one electric engine, in order to achieve compliance with the required NO_x reductions.

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) exceed the 100 TPY major source threshold for criteria pollutants. It is also a major source of Hazardous Air Pollutants (HAP) because individual HAP potential emissions are greater than 10 TPY (Formaldehyde - 29.70 TPY) and the total HAP potential emissions are greater than 25 TPY (44.80 TPY).

Prevention of Significant Deterioration (PSD)

The facility operations are not one of the 28 listed major source categories, and this facility is located in an attainment area for all criteria pollutants. 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 for NO_x and CO each exceed 250 TPY. Emission Unit Nos. 001 - 003 (Engine Nos. C004, C005, and C006) were each installed prior to the PSD applicability date of January 1977 and have not been modified since installation; therefore, there are no applicable emission limits for these units. Emission Unit No. 004 (Engine No. C008) is subject to a Best Available Control Technology (BACT) emission limit of 132.28 lb/hr for NO_x. A PSD permit (Air Permit No. X001) was issued on May 26, 1981, for the initial construction of Emission Unit No. 004 (Engine No. C008) that included the PSD BACT limit for NO_x. Emission Unit No. 005 (Engine No. C009) is subject to BACT limits of 19.40 lb/hr for NO_x, 23.63 lb/hr for CO, and 13.40 lb/hr for VOC. A PSD permit (Air Permit No. X002) was issued on February 19, 1988, for the initial construction of Emission Unit No. 005 (Engine No. C009) that included PSD BACT limits for NO_x and CO emissions. Emission Unit No. 005 (Engine No. C009) underwent PSD review again in 2001 for VOC emissions after stack testing indicated the engine’s VOC potential to emit had been underestimated and exceeded the significant emission rate. As a result, Air Permit No. X002 was re-issued on June 19, 2001, to re-establish PSD BACT emission limitations for NO_x and CO and establish a VOC PSD BACT emission limitation for Emission Unit No. 005 (Engine No. C009). The emergency generator engine (Emission Unit No. 006/SNGC No. G003) is subject to an hourly operating limit of 500 hr/yr to restrict the NO_x potential emissions below the PSD significant emission rate.

New Source Performance Standards (NSPS)

40 CFR Part 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (Subpart Dc) [Adopted by reference in ADEM Admin. Code r. 335-3-10-.02(2)(c)]

Per 40 CFR §60.40c(a), because the rated heat input capacity for the fuel gas heater is less than 10 MMBtu/hr, this unit is not subject to Subpart Dc.

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)]

Compressor Engine Nos. C004, C005, C006, C008 and C009 and Emergency Generator Engine No. G003 at this facility are not subject to Subpart JJJJ, based on the date that each engine was manufactured [Compressor Engine Nos. C004 and C005 (1952), Compressor Engine No. C006 (1959), Compressor Engine No. C008 (1982), Compressor Engine No. C009 (1989) and Emergency Generator Engine No. G003 (2007)], all of which are prior to each unit's applicability date under Subpart JJJJ.

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

The compressors associated with Compressor Engine Nos. C004, C005, C006, C008 and C009 were each installed prior to the August 23, 2011, applicability date of Subpart OOOO; 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)]

All equipment and processes at this facility were installed or modified prior to the September 18, 2015 applicability date of Subpart OOOOa, 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)

All equipment and processes at this facility were installed or modified prior to the December 6, 2022, applicability date of this regulation; therefore, this facility is not subject to this Subpart.

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

40 CFR Part 63, Subpart 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)]

This facility is a major source for HAPs and operates five 2-stroke lean-burn RICE (Compressor Engine Nos. C004, C005, C006, C008 and C009) that were installed between 1952 and 1989. These units are each considered an affected source under 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (Subpart ZZZZ). In accordance with 40 CFR §63.6590(b)(3), existing lean burn engines (2-stroke and 4-stroke) greater than 500 hp located at a major source of HAP do not have to meet the requirements of Subpart ZZZZ or Subpart A. An initial notification is also not required. Therefore, although these RICE are not excluded from the applicability of Subpart ZZZZ, there are no applicable requirements.

The Emergency Generator Engine No. G003 is also an affected source under Subpart ZZZZ. Because its site rating exceeds 500 hp, 40 CFR §63.6590(b)(1)(i) specifies that except for the requirement to submit an initial notification, SNGC does not have to meet the requirements Subpart ZZZZ or Subpart A. SNGC's original application to construct this emergency engine satisfied the initial notification requirement. However, SNGC is required to record the hours of operation for this unit on a calendar basis to ensure that the permittee operates the engine as an emergency stationary RICE as specified in 40 CFR §63.6640(f). Also, 40 CFR §63.6625(f) requires the installation of a non-resettable hour meter if one is not already installed. SNGC has installed the non-resettable hour meter. No testing is required for the Emergency Generator Engine No. G003.

40 CFR Part 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters (Subpart DDDDD) [Adopted by reference in ADEM Admin. Code r. 335-3-11-.06(107)]

The Fuel Gas Heater No. 1 is a 0.25 MMBtu/hr Silvalls SB-16-6, natural gas-fired fuel gas heater and is considered an affected source under 40 CFR Part 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters (Subpart DDDDD). This unit is considered an existing affected source as defined in 40 CFR §63.7490 since it was manufactured prior to the June 4, 2010, applicability date. This unit has a heat input capacity less than 5 MMBtu/hr and burns only natural gas; therefore, SNGC was required to perform an initial tune-up and a one-time energy assessment of the facility in accordance with 40 CFR §63.7510(e). The initial tune-up was completed in accordance with 40 CFR §63.7540(a)(10)(i) through (vi) on January 31, 2016, and the one-time energy assessment was completed in accordance with 40 CFR §63.7575 and Table 3 of Subpart DDDDD on November 4, 2015. SNGC is required to perform subsequent tune-ups every five years in accordance with 40 CFR §63.7500(e) and 40 CFR §63.7540(a)(12).

SNGC is required to keep a copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart DDDDD, including all documentation supporting any initial notification, notification of compliance status, or compliance report submitted according to the requirements in 40 CFR §63.10(b)(2)(xiv). In addition, SNGC is required to submit a compliance report every five years after the January 31, 2016, compliance date containing the information specified in 40 CFR §63.7550(c). The compliance report must be postmarked or submitted no later than January 31st following the end of the five year period. The last 5-year tune-up was conducted on April 9, 2025, and the compliance report was received on January 30, 2026. The next 5-year tune-up must be completed no later than October 15, 2030, and the next 5-year compliance report is due no later

than January 31, 2031.

Mandatory Greenhouse Gas Reporting

40 CFR Part 98, Subpart A General Provision

This facility is a listed source category as defined in 40 CFR §98.2(a)(2), it is potentially 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 TPY) of CO₂e or more per year from all stationary fuel combustion sources combined. SNGC must calculate greenhouse gas quantities according to the methodologies described in 40 CFR §98.2(c). SNGC is 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. In accordance with 40 CFR §98.5, the annual report must be submitted electronically in accordance with the requirements of 40 CFR §98.4 (via EPA's Central Data Exchange). 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.

Emission Testing and Monitoring

SNGC is required to certify on a semiannual basis that only natural gas was burned in the five engines, one emergency generator engine, and one fuel gas heater as a method for demonstrating compliance with the visible emission requirements of ADEM Admin. Code r. 335-3-4-.01(1) because opacity is negligible while combusting natural gas.

To monitor compliance with the applicable BACT emission limits of NO_x (132.28 lb/hr) for Emission Unit No. 004 and the applicable BACT emission limits of NO_x (19.40 lb/hr), CO (23.63 lb/hr), and VOC (13.40 lb/hr) for Emission Unit No. 005, 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), with a minimum of three calendar months elapsing between each semiannual test. The first emissions testing conducted following the effective date of this renewal permit must be conducted using the appropriate EPA Reference Method. Emission testing for the remainder of the permit term may be conducted using either the appropriate EPA Reference Method or the CTM-034 method with a portable analyzer if approved in advance by the Air Division.

The Fuel Gas Heater No. 1 has a heat input capacity less than 5 MMBtu/hr and burns only natural gas; therefore, SNGC was required to perform an initial tune-up and a one-time energy assessment of the facility in accordance with 40 CFR §63.7510(e). The initial tune-up was completed in accordance with 40 CFR §63.7540(a)(10)(i) through (vi) on January 31, 2016, and the one-time energy assessment was completed in accordance with 40 CFR §63.7575 and Table 3 of Subpart DDDDD on November 4, 2015. SNGC is required to perform subsequent tune-ups every five years in accordance with 40 CFR §63.7500(e) and 40 CFR §63.7540(a)(12).

No emission testing is required for the Emergency Generator Engine No. G003.

Recordkeeping and Reporting

As part of the Semiannual Monitoring Report, SNGC is required to include a statement addressing whether only natural gas was fired in each of the five engines, one emergency generator engine, and one fuel gas heater 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). SNGC 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.

Within 10 days of the end of the month, SNGC is required to record the hours of operation for the emergency generator engine (G003) on a monthly and calendar year basis to ensure that SNGC operates the engine as an emergency stationary RICE in accordance with 40 CFR §63.6640(f). These records are required to be maintained in a permanent form suitable for inspection and made available upon request.

SNGC is required to submit a Notification of Compliance Status for the fuel gas heater (FGH1) containing the information specified in 40 CFR §63.7545(e)(1) and (8) within 60 days of completing each required subsequent tune-up. SNGC is required to submit a compliance report for the fuel gas heater every five years containing the information specified in 40 CFR §63.7550(c). In addition, SNGC is required to keep copies of all documentation submitted for the fuel gas heater.

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 five 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.

Compressor Engine Nos. C004, C005, C006, C008 and C009 do not use an active control device as defined in the CAM regulations to meet the applicable emission limitations. As such, the facility is not subject to CAM requirements.

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 Southern Natural Gas Company, LLC's Title V Major Source Operating Permit (406-0003) be renewed with the conditions noted above pending the resolution of any comments received during the 30-day public comment period and the 45-day EPA review.



Brandon R. Cranford
Chemical Branch
Air Division

September 23, 2026
Date

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