**NORTH CAROLINA DIVISION OF AIR QUALITY**

# Application Review

**Issue Date:** Date needed

**Region:** Mooresville Regional Office
**County:** Iredell
**NC Facility ID:** 4900225
**Inspector's Name:** Brian Huang
**Date of Last Inspection:** 08/07/2024
**Compliance Code:** 3 / Compliance - inspection

## Facility Data

**Applicant (Facility's Name):** Transcontinental Gas Pipe Line Company, LLC – Station 150

**Facility Address:**
Transcontinental Gas Pipe Line Company, LLC – Station 150
236 Transco Road
Mooresville, NC 28117

**SIC:** 4922 / Natural Gas Transmission
**NAICS:** 486210 / Pipeline Transportation of Natural Gas

**Facility Classification: Before:** Title V **After:** Title V
**Fee Classification: Before:** Title V **After:** Title V

## Permit Applicability (this application only)

**SIP:** 15A NCAC 02D .0501(c), .0516, .0521, .0524, .0958, .1111, .1806
**NSPS:** 40 CFR 60, Subparts JJJJ, KKKK, and OOOOa
**NESHAP:** 40 CFR 63, Subpart ZZZZ
**PSD:** N/A
**PSD Avoidance:** N/A
**NC Toxics:** 15A NCAC 02D .1100
**112(r):** N/A
**Other:** N/A

## Contact Data

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### Authorized Contact

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## Application Data

**Application Number:** 4900225.24A
**Date Received:** 10/18/2024
**Application Type:** Modification
**Application Schedule:** TV-Sign-501(b)(2) Part II

**Existing Permit Data**
**Existing Permit Number:** 08044/T19
**Existing Permit Issue Date:** 07/26/2023
**Existing Permit Expiration Date:** 06/30/2026

**Total Actual emissions in TONS/YEAR:**

| CY | SO2 | NOX | VOC | CO | PM10 | Total HAP | Largest HAP |
|---|---|---|---|---|---|---|---|
| 2023 | 0.1500 | 246.79 | 92.38 | 182.21 | 13.27 | 59.24 | 41.19 [Formaldehyde] |
| 2022 | 0.1700 | 267.19 | 99.92 | 207.29 | 15.13 | 65.47 | 45.53 [Formaldehyde] |
| 2021 | 0.2000 | 259.51 | 99.89 | 218.76 | 16.08 | 65.51 | 45.55 [Formaldehyde] |
| 2020 | 0.1600 | 227.97 | 97.65 | 192.59 | 13.94 | 64.04 | 44.54 [Formaldehyde] |
| 2019 | 0.1800 | 231.44 | 99.80 | 200.94 | 14.68 | 64.99 | 45.19 [Formaldehyde] |

**Review Engineer:** Luke Mayer

**Review Engineer's Signature:** **Date:**

**Comments / Recommendations:**
**Issue:** 08044/T20
**Permit Issue Date:** Date needed
**Permit Expiration Date:** Date needed

## 1. Purpose of Application

Transcontinental Gas Pipe Line Company, LLC (Transco) currently holds Title V Permit No. 08044T19 with an expiration date of June 30, 2026, for a natural gas transmission facility in Mooresville, Iredell County, North Carolina. This permit application is for a Part II 501(b)(2) significant modification. The application included the following changes:

- Retiring of 15 two-stroke, lean-burn (2SLB) mainline compressor engines **(ID Nos. ES-M/L1** through **ES-M/L15)**
- Installation of two new natural gas-fired Solar Titan 130-23502S combustion turbines **(ID Nos. ES-M/L17** and **ES-M/L18)**
- Retiring of three auxiliary emergency-use generator engines **(ID Nos. ES-AUX1** through **ES-AUX3)** and two air compressor engines **(ID Nos. ES-A/C5** and **ES-A/C6)**
- Installation of two natural gas-fired four-stroke, lean-burn (4SLB) emergency generator engines **(ID Nos. EGEN-01** and **EGEN-02)** and EMD air compression.
- Adding new ancillary equipment and activities associated with the planned modifications **(ID Nos. I-M/L16-CB**, **I-M/L17-CB**, **I-M/L18**, **I-TANK-01**, **I-TANK-02**, **I-TTLO**, **I-FUGS-NEW**, **I-SHB**, **I-DHB**, and **I-PIGGING)**.

The removal of the legacy sources has reduced the facility's potential to emit such that the facility is now classified as a minor source for the purposes of Prevention of Significant Deterioration (PSD) and an area source for the purposes of National Emission Standards for Hazardous Air Pollutants (NESHAPs). With this permit modification, the permit text will be updated to remove all PSD avoidance conditions, as they are now unnecessary. Furthermore, conditions related to NESHAPs/Maximum Achievable Control Technology (MACT) standards will be revised or removed, as applicable, to reflect the facility's current status as an area source. Conditions related to the NC Air Toxics Program under 15A NCAC 02D .1100 that apply specifically to the facility's operations during the commissioning period will also be removed as the commissioning period has been completed. Other corrections were made as necessary to reflect the current state of the facility. See the regulatory review in Sections 5, 6, and 7 below for more information. All of these changes are summarized below:

- Removal of conditions for 15A NCAC 02D .1111 for 40 CFR Part 63, Subpart YYYY relating to the facility's two combustion turbines **(ID Nos. ES-M/L17** and **ES-M/L18)** because this subpart only applies to major sources
- Removal of conditions for 15A NCAC 02D .1100 that set limits for emissions of toxic air pollutants (TAPs) specifically during the commissioning period as the commissioning period is now complete. Limits on emissions of TAPs after the commissioning period shall remain
- Removal of PSD avoidance conditions under 15A NCAC 02Q .0317 for the two combustion turbines **(ID Nos. ES-M/L17** and **ES-M/L18)** and the two emergency generators **(ID Nos. EGEN-01** and **EGEN-02)** as the facility is now classified as PSD minor and the conditions are no longer necessary
- Removal of the existing combustion turbine **(ID No. ES-M/L16)** from conditions related to 15A NCAC 02D .0524 for 40 CFR 60, Subpart OOOOa as this source was constructed prior to the period of applicability of this subpart
- Removal of conditions for 15A NCAC 02Q .0504 requiring the submittal of a Part II modification application because the application has already been submitted
- Removal of conditions for 15A NCAC 02D .0501(c) that apply only to the commissioning period as the commissioning period is now complete
- Removal of conditions for 15A NCAC 02D .1408 as the facility's $NO_x$ potential emissions are now lower than the applicability threshold for this rule

The application for modification[1] was received on October 18, 2024. All terms and conditions of the existing permit shall remain in effect until the modified permit has been issued or denied.

## 2. Facility Description

Transcontinental Gas Pipe Line Company, LLC (Transco) Compressor Station 150 is a natural gas compressor station that operates under Standard Industrial Classification (SIC) code 4922 and North American Industry Classification System (NAICS) code 486210 and delivers natural gas through a 10,000-mile interstate transmission pipeline system extending from south Texas to New York City, transporting approximately 15% of the nation's natural gas with 57 stations.

| Description of Emissions | Annual Potential Emissions in Tons Per Year (tpy) | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | $NO_x$ | CO | VOC | $SO_2$ | PM | $PM_{10}$ | $PM_{2.5}$ | Single HAP | Total HAPs |
| **Total Site-Wide PTE** | **88.04** | **82.64** | **20.14** | **8.04** | **15.62** | **15.62** | **15.62** | **2.51** | **3.47** |

The facility is a Title V facility because, before modification, its potential emissions of nitrogen oxides ($NO_x$), volatile organic compounds (VOCs), and carbon monoxide (CO) exceeded the major source threshold of 100 tons per year (tpy) before modification. After modification, the facility's potential emissions of all criteria pollutants are below 100 tpy, but Transco has not requested to reclassify the facility as small or synthetic minor and continues to hold a Title V permit. See the review of the change in potential emissions as part of this modification in Section 8 below for more information.

## 3. History/Background/Application Chronology

History/Background

July 13, 2021 — TV permit renewal with modification issued. Air Permit No. 08044T18 was issued on July 13, 2021 with an expiration date of June 30, 2026. *(See Richard Simpson's TV review for permit No. 08044T18, dated July 13, 2021)*

July 26, 2023 — Air Permit No. 08044T19 was issued for a Part I 501(b)(2) modification. This modification starts the process of retiring 15 two-stroke, lean burn mainline compressor engines **(ID Nos. ES-M/L1** through **ES-M/L15)**, 3 emergency-use generator engines **(ID Nos. ES-AUX1** through **ES-AUX3)**, and 2 air compressor engines **(ID Nos. ES-A/C5** and **ES-A/C6)**, and replacing them with two natural gas-fired Solar Titan 130-23502S combustion turbines **(ID Nos. ES-M/L17** and **ES-M/L18)** and two natural gas-fired four-stroke, lean-burn (4SLB) emergency generator engines **(ID Nos. EGEN-01** and **EGEN-02)**. This application also adds several ancillary insignificant sources. *(See Ed Martin's TV review for permit No. 08044T19, dated July 26, 2023)*

Application Chronology

October 18, 2024 — Received permit application 4900225.24A for a Part II 501(b)(2) modification.

October 18, 2024 — Sent acknowledgment letter indicating that the application for permit modification was complete, effective October 18, 2024.

[1] AQ_F_4900225_20241018_PRMT_PmtApp_.24A

| | |
|---|---|
| October 23, 2024 | Draft permit and review forwarded to Supervisor for comments. |
| December 3, 2024 | Draft permit and review forwarded to applicant, SSCB, and regional office for comments. |
| December 17, 2024 | Contractor Kevin Eldridge indicated via email that they had comments on the draft permit or permit review. Mr. Eldridge requested substantial changes to the permit to reflect the facility's new PSD and HAP source status and corrections to the permit condition for 40 CFR 60, Subpart KKKK. |
| January 27, 2025 | Application transferred to engineer Luke Mayer. |
| March 28, 2025 | Revised draft permit and review forwarded to Supervisor for comments. |
| April 4, 2025 | Comments received from Supervisor. Editorial changes requested for the permit. Editorial changes and additional evaluation for total facility PTE before and after modification requested for the statement of basis. |
| April 16, 2025 | Supervisor indicated that they had no comments on the draft permit or permit review. |
| April 22, 2025 | Revised draft permit and review forwarded to applicant and regional office for comments. |
| April 24, 2025 | Revised draft permit and review forwarded to SSCB for comments. |
| April 29, 2025 | Jennifer Manning of the Mooresville Regional Office indicated via email that they had no comments on the draft permit or permit review. |
| April 29, 2025 | Michael Callegari of Transcontinental Gas Pipe Line Company, LLC indicated via email that they had comments on the draft permit or permit review. Transco requested that conditions for 15A NCAC 02D .1408 remain in the permit for this issuance despite no longer being applicable, because a follow-up application for expansion would cause the facility's potential emissions of $NO_x$ to increase above the threshold once again. Transco also requested a handful of editorial changes and a correction to the facility's limits for 15A NCAC 02D .1100 for ES-M/L17 and ES-M/L18. |
| April 30, 2025 | Samir Parekh of the SSCB indicated via email that they had no comments on the draft permit or permit review. |
| April 30, 2025 | Michael Callegari of Transcontinental Gas Pipe Line Company, LLC indicated via email that they had no further comments on the draft permit or permit review. |
| date | Draft permit and permit review forwarded to public notice via DAQ website. |
| date | Public comment period ends. Comments were/were not received. |
| date | EPA comment period ends. Comments were/were not received. |

date Permit issued.

## 4. Permit Modifications/Changes and TVEE Discussion

The following table describes the modifications to the current permit as part of the modification process. This summary is not meant to be an exact accounting of each change but a summary of those changes.

| Page(s) | Section | Description of Changes |
|---|---|---|
| Cover Letter and throughout permit | -- | • Updated all dates and permit revision numbers<br>• Reformatted permit in accordance with current TV permitting shell |
| 4 | 1 | • Revised the source description of emission source **ES-M/L16** for formatting consistency |
| 5-7 (old pages) | 2.1 A (old section) | • Removed emissions sources **ES-M/L1** through **ES-M/L15** and all associated conditions |
| 5-7 | 2.1 A | • Updated Section 2.1 B to Section 2.1 A (old Section 2.1 A was removed, see above)<br>• Removed conditions for 15A NCAC 02D .1111 for 40 CFR 63, Subpart YYYY because the facility is no longer a major source<br>• Removed conditions for 15A NCAC 02D .0524 for 40 CFR 60, Subpart OOOOa because this source **(ID No. ES-M/L16)** was constructed prior to the period of applicability for this subpart<br>• Reorganized regulation table and permit text to place regulations in numerical order |
| 11-12 (old pages) | 2.1 C (old section) | • Removed emissions sources **ES-AUX1** through **ES-AUX3** and all associated conditions |
| 13-14 (old pages) | 2.1 D (old section) | • Removed emissions source **ES-A/C5** and all associated conditions |
| 15-16 (old pages) | 2.1 E (old section) | • Removed emissions source **ES-A/C6** and all associated conditions |
| 8-10 | 2.1 B | • Updated Section 2.1 F to Section 2.1 B (old Section 2.1 B was updated to Section 2.1 A, old Sections 2.1 C, D, and E were removed; see above)<br>• Removed conditions for 15A NCAC 02D .1111 for 40 CFR 63, Subpart YYYY because the facility is no longer a major source of HAPs<br>• Removed conditions for 15A NCAC 02Q .0317 (PSD Avoidance) because the facility is no longer classified as PSD major, and this condition is now unnecessary<br>• Removed conditions for 15A NCAC 02Q .0504 because the Part II modification application has already been submitted<br>• Reorganized regulation table and permit text to place regulations in numerical order |
| 8-10 | 2.1 B.2 | • Revised conditions for 15A NCAC 02D .0524 for 40 CFR 60, Subpart KKKK to reflect the fact that the facility has multiple options for determining compliance with the requirements of this subpart |

| Page(s) | Section | Description of Changes |
|---|---|---|
| 12-16 | 2.1 C | • Updated Section 2.1 G to Section 2.1 C (old Section 2.1 B was updated to Section 2.1 A, old Sections 2.1 C, D, and E were removed, old Section F was updated to Section 2.1 B; see above)<br>• Removed conditions for 15A NCAC 02Q .0317 (PSD Avoidance) because the facility is no longer classified as PSD major, and this condition is now unnecessary<br>• Removed conditions for 15A NCAC 02Q .0504 because the Part II modification application has already been submitted<br>• Removed conditions for 15A NCAC 02D .0501(c) that set $NO_x$ emission limits for the commissioning period because the commissioning period has been completed<br>• Reorganized regulation table and permit text to place regulations in numerical order |
| 12-15 | 2.1 C.3 | • Revised conditions for 15A NCAC 02D .0524 for 40 CFR 60, Subpart JJJJ to reflect the most recent updates to the text of the rule |
| 15-16 | 2.1 C.4 | • Revised conditions for 15A NCAC 02D .1111 for 40 CFR 63, Subpart ZZZZ to reflect the most recent updates to the text of the rule |
| 29-31 (old pages) | 2.2 A (old section) | • Removed old Section 2.2 A as all relevant sources have been decommissioned |
| 32-33 (old pages) | 2.2 B (old section) | • Removed old Section 2.2 B as all relevant sources have been decommissioned |
| 17-18 | Section 2.2 A | • Updated Section 2.2 C to Section 2.2 A (old Sections 2.2 A and B were removed; see above)<br>• Reorganized regulation table and permit text to place regulations in numerical order |
| 17 | Section 2.2 A.1 | • Removed conditions for 15A NCAC 02D .1100 that apply only to the commissioning period as the commissioning period is complete<br>• Corrected the limits for 15A NCAC 02D .1100 for ES-M/L17 and ES-M/L18 to accurately reflect modeled rates |
| 37-39 (old pages) | Section 2.2 D (old section) | • Removed old Section 2.2 D because all requirements in this section are no longer applicable (PSD avoidance, commissioning period-only, etc.) |
| 19-21 | Section 2.2 B | • Updated Section 2.2 E to Section 2.2 B (old Sections 2.2 A, B, and D were removed, old Section 2.2 C updated to Section 2.2 A; see above)<br>• Removed existing turbine **(ID No. ES-M/L16)** from conditions for 15A NCAC 02D .0524 for 40 CFR 60, Subpart OOOOa because this source was constructed prior to the period of applicability for this subpart<br>• Updated condition for 40 CFR 60, Subpart OOOOa to reflect current regulatory language |
| 24 | 4 | • Updated General Conditions with most recent current version (Version 8.0 dated 07/10/2024) |

This permit modification brings several changes to the Title V Equipment Editor (TVEE) to complete the modification process from Part I (Application No. 4900225.22A[2]). All decommissioned sources, including fifteen two-stroke natural gas lean-fired internal combustion engines **(ID Nos. ES-M/L1** through **ES-M/L15)**, three four-stroke natural gas rich-fired internal emergency combustion engines **(ID Nos. ES-AUX1** through **ES-AUX3)**, and two four-stroke natural gas rich-fired internal emergency

[2] AQ_F_4900225_20220906_PRMT_PmtApp_T19

combustion engines **(ID Nos. ES-A/C5** and **ES-A/C6)**, have been removed. The name for one natural gas-fired four-stroke lean-burn emergency generator **(ID No. EGEN-01)** has been corrected in TVEE to remove a typo. The description of the existing natural gas-fired dry low $NO_x$ combustion turbine **(ID No. ES-M/L16)** has been updated to reflect that this source is, in fact, not subject to 40 CFR 60, Subpart OOOOa because it was constructed prior to the period of applicability for this subpart. The source description of the existing combustion turbine **(ID No. ES-M/L16)** was revised slightly to maintain consistent formatting.

TVEE was reviewed and approved by Connie Horne on XXXXX XX, XXXX.

**5. Regulatory Review**

Transco Station 150 is subject to the following regulations. The facility's equipment and operations, as permitted, have not changed since the Part I modification in 2023. The equipment included in said modification has by now been installed (in the case of new sources) or removed (in the case of retired sources). The permit was updated to reflect the most current stipulations for all applicable regulations, where necessary.

15A NCAC 02D .0501(c): Compliance With Emission Control Standards – The facility's fifteen two-stroke natural gas lean-fired internal combustion engines **(ID Nos. ES-M/L1** through **ES-M/L15)**, natural gas-fired dry low $NO_x$ combustion turbine **(ID No. ES-M/L16)**, three four-stroke natural gas rich-fired internal emergency combustion engines **(ID Nos. ES-AUX1** through **ES-AUX3)**, two four-stroke natural gas rich-fired internal emergency combustion engines **(ID Nos. ES-A/C5** and **ES-A/C6)**, two natural gas-fired Solar Titan 130 combustion turbines with dry low $NO_x$ **(ID Nos. ES-M/L17** and **ES-M/L18)**, and two natural gas-fired four-stroke lean-burn emergency generators **(ID Nos. EGEN-01** and **EGEN-02)** are subject to special requirements to ensure compliance with the nitrogen oxide ($NO_x$) ambient air quality standards in 15A NCAC 02D .0407.

As part of this modification, the fifteen two-stroke natural gas lean-fired internal combustion engines **(ID Nos. ES-M/L1** through **ES-M/L15)**, three four-stroke natural gas rich-fired internal emergency combustion engines **(ID Nos. ES-AUX1** through **ES-AUX3)**, and two four-stroke natural gas rich-fired internal emergency combustion engines **(ID Nos. ES-A/C5** and **ES-A/C6)** are being retired and will be removed from the permit.

The two natural gas-fired Solar Titan 130 combustion turbines with dry low $NO_x$ **(ID Nos. ES-M/L17** and **ES-M/L18)** and two natural gas-fired four-stroke lean-burn emergency generators **(ID Nos. EGEN-01** and **EGEN-02)** were subject to this rule only during the commissioning period. During the "non-ozone season" (October 1 through April 30), these sources were required to discharge into the atmosphere less than 142.6 pounds per hour of $NO_x$. During the "ozone season" (May 1 through September 30), these sources were required to discharge into the atmosphere less than 76.0 pounds per hour of nitrogen oxides ($NO_x$). The commissioning period is now complete, and several legacy sources have now been decommissioned (as mentioned above), so the risk of the facility failing to comply with the $NO_x$ ambient air quality standard is now much lower. Conditions related to this rule that specifically apply to the commissioning period will be removed as part of this permit modification.

A condition related to this rule applicable to the existing natural gas-fired dry low $NO_x$ combustion turbine **(ID No. ES-M/L16)** shall remain in the permit because it is not applicable to a decommissioned source, nor is it applicable only during the commissioning period.

15A NCAC 02D .0516: Sulfur Dioxide Emissions from Combustion Sources – The facility's fifteen two-stroke natural gas lean-fired internal combustion engines **(ID Nos. ES-M/L1** through **ES-M/L15)**, three four-stroke natural gas rich-fired internal emergency combustion engines **(ID Nos. ES-AUX1** through **ES-AUX3)**, two four-stroke natural gas rich-fired internal emergency combustion engines **(ID Nos. ES-A/C5** and **ES-A/C6)**, and two natural gas-fired four-stroke lean-burn emergency generators **(ID Nos. EGEN-01** and **EGEN-02)** are subject to this rule because they are combustion sources. The facility's two natural gas-fired Solar Titan 130 combustion turbines with dry low $NO_x$ **(ID Nos. ES-M/L17** and **ES-M/L18)** are not subject to this rule because they are subject to a more stringent sulfur dioxide ($SO_2$) limit through 15A NCAC 02D .0524 for 40 CFR 60, Subpart KKKK.

As part of this modification, the fifteen two-stroke natural gas lean-fired internal combustion engines **(ID Nos. ES-M/L1** through **ES-M/L15)**, three four-stroke natural gas rich-fired internal emergency combustion engines **(ID Nos. ES-AUX1** through **ES-AUX3)**, and two four-stroke natural gas rich-fired internal emergency combustion engines **(ID Nos. ES-A/C5** and **ES-A/C6)** are being retired and will be removed from the permit. The two natural gas-fired four-stroke lean-burn emergency generators **(ID Nos. EGEN-01** and **EGEN-02)** have already been added as part of the previous application (Application No. 4900225.22A, Part 1 of the 501(b)(2) modification).

All of the above sources are (or were) subject to a flat emission rate limit of 2.3 lb of $SO_2$ per million Btu heat input and fire natural gas. No monitoring, recordkeeping, or reporting is required for the firing of natural gas in these sources. For the combustion of natural gas in stationary combustion turbines, the AP-42 emissions factor for sulfur dioxide is 0.94S lb of $SO_2$ per million British thermal unit (Btu, where S is the sulfur content of the fuel; for natural gas combustion turbines, S is given as 0.0034, giving a final emission factor of 0.003196 lb of $SO_2$ per million Btu. For the combustion of natural gas in four-stroke lean-burn (4SLB) internal combustion engines, the AP-42 emissions factor for sulfur dioxide is 0.000588 lb of $SO_2$ per million Btu. Continued compliance is expected. The most recent inspection report[3], prepared by engineer Brian Huang of the Mooresville Regional Office and dated August 7, 2024, indicated that the facility was in compliance with this rule at the time of inspection.

15A NCAC 02D .0521: Control of Visible Emissions – The facility's fifteen two-stroke natural gas lean-fired internal combustion engines **(ID Nos. ES-M/L1** through **ES-M/L15)**, three four-stroke natural gas rich-fired internal emergency combustion engines **(ID Nos. ES-AUX1** through **ES-AUX3)**, two four-stroke natural gas rich-fired internal emergency combustion engines **(ID Nos. ES-A/C5** and **ES-A/C6)**, two natural gas-fired Solar Titan 130 combustion turbines with dry low $NO_x$ **(ID Nos. ES-M/L17** and **ES-M/L18)**, and two natural gas-fired four-stroke lean-burn emergency generators **(ID Nos. EGEN-01** and **EGEN-02)** are subject to this rule because they can be reasonably expected to generate visible emissions.

As part of this modification, the fifteen two-stroke natural gas lean-fired internal combustion engines **(ID Nos. ES-M/L1** through **ES-M/L15)**, three four-stroke natural gas rich-fired internal emergency combustion engines **(ID Nos. ES-AUX1** through **ES-AUX3)**, and two four-stroke natural gas rich-fired internal emergency combustion engines **(ID Nos. ES-A/C5** and **ES-A/C6)** are being retired and will be removed from the permit. The two natural gas-fired Solar Titan 130 combustion turbines with dry low $NO_x$ **(ID Nos. ES-M/L17** and **ES-M/L18)** and two natural gas-fired four-stroke lean-burn emergency generators **(ID Nos. EGEN-01** and **EGEN-02)** have already been added as part of the previous application (Application No. 4900225.22A[2], Part 1 of the 501(b)(2) modification).

[3] AQ_F_4900225_20240815_CMPL_InspRpt

All of the sources that remain were manufactured after July 1, 1971, and fire natural gas. Visible emissions from these sources shall not be more than 20% opacity when averaged over a six-minute period. Six-minute periods may exceed 20% opacity if: no six-minute period exceeds 87% opacity; no more than one six-minute period exceeds 20% opacity in any hour; and no more than four six-minute periods exceed 20% opacity in any 24-hour period.

No monitoring, recordkeeping, or reporting is required for the firing of natural gas in these sources. Natural gas combustion is generally expected to produce minimal visible emissions. Visible emissions are largely caused by airborne particulate matter (PM), and natural gas combustion generally produces very little emissions of particulate matter. The AP-42 emissions factor for total PM emissions from natural gas combustion in stationary combustion turbines is 0.0066 lb of PM per million Btu, and the factor for condensable PM from natural gas combustion in 4-stroke lean-burn internal combustion engines is 0.00991 lb of PM per million Btu. Continued compliance is expected. According to the most recent inspection report[3], prepared by engineer Brian Huang of the Mooresville Regional Office and dated August 7, 2024, no unacceptable visible emissions were detected during inspection and visible emissions are unlikely to occur if the engines are operated in accordance with manufacturer specifications. Please note that the new equipment **(ID Nos. ES-M/L17**, **ES-M/L18**, **EGEN-01**, and **EGEN-02)** had not operated by the time of this inspection – according to the cover letter included with Application No. 4900225.24A[1], the equipment was installed in May 2024 and did not enter service until October 2, 2024.

15A NCAC 02D .0524: New Source Performance Standards – Several of the facility's sources or source groups are subject to this rule because they are also subject to federal New Source Performance Standards.

The facility's two natural gas-fired four-stroke lean-burn emergency generators **(ID Nos. EGEN-01** and **EGEN-02)** are subject to 40 CFR 60, Subpart JJJJ because they are stationary spark-ignition internal combustion engines.

The facility's two natural gas-fired Solar Titan 130 combustion turbines with dry low $NO_x$ **(ID Nos. ES-M/L17** and **ES-M/L18)** are subject to 40 CFR 60, Subpart KKKK because they are stationary combustion turbines with maximum heat inputs greater than 10.7 gigajoules (10 million Btu) per hour.

The facility is also subject to 40 CFR 60, Subpart OOOOa because the facility is in the crude oil and natural gas subcategory and because the facility's natural gas-fired Solar Titan 130 combustion turbines with dry low $NO_x$ **(ID Nos. ES-M/L17** and **ES-M/L18)** were constructed or last modified after September 18, 2015 and on or before December 6, 2022, triggering the applicability of this subpart.

See the NSPS review segment in Section 6 for more information. The facility owner or operator is responsible for complying with all applicable NSPS requirements.

15A NCAC 02D .0958, Work Practices for Sources of Volatile Organic Compounds - On November 1, 2016, amendments to 15A NCAC 02D .0902 were finalized to narrow applicability of work practice standards in 15A NCAC 02D .0958 from statewide to the maintenance area for the 1997 8-hour ozone standard. This change was made primarily because the abundance of biogenic VOC emissions in North Carolina results in ozone formation being limited by the amount of available nitrogen oxides (NOx) emissions. Provisions of the Clean Air Act require VOC requirements previously implemented in an ozone nonattainment area prior to redesignation remain in place. Pursuant to 15A NCAC 02D .0902(f), the following locations still remain subject to the work practice

standards in 15A NCAC 02D .0958: Cabarrus County, Gaston County, Lincoln County, Mecklenburg County, Rowan County, Union County, and Davidson Township and Coddle Creek Township in Iredell County. The applicability of this rule is traditionally discussed during permit actions for facilities located in these areas.

Transco Station 150 is located near Mooresville, Iredell County, which is partially within the bounds of both Davidson and Coddle Creek Townships. Station 150 itself is located slightly southwest of the Mooresville urban center and is located within Davidson Township. However, Station 150 does not currently use VOCs as solvents, carriers, material processing media, or industrial chemical reactants, or in other similar uses; nor does it mix, blend, or manufacture VOCs or emit VOCs as a product of chemical reactions as described in 15A NCAC 02D .0958. The facility's primary function is to pressurize and discharge natural gas into pipeline infrastructure for transport across the country. As a result, the permit does not currently include a condition for 15A NCAC 02D .0958, and one will not be added as part of this modification. No change is expected as part of this modification with respect to the facility's usage or handling of VOCs or VOC-containing materials. It should be noted that, as part of this modification, several legacy sources are being removed from the permit, and the facility's total potential emissions of VOCs are expected to decrease significantly as a result.

15A NCAC 02D .1111: Maximum Achievable Control Technology – Several of the facility's sources or source groups are subject to this rule because they are subject to federal National Emission Standards for Hazardous Air Pollutants (NESHAPs).

The facility's fifteen two-stroke natural gas lean-fired internal combustion engines **(ID Nos. ES-M/L1** through **ES-M/L15)**, three four-stroke natural gas rich-fired internal emergency combustion engines **(ID Nos. ES-AUX1** through **ES-AUX3)**, two four-stroke natural gas rich-fired internal emergency combustion engines **(ID Nos. ES-A/C5** and **ES-A/C6)**, and two natural gas-fired four-stroke lean-burn emergency generators **(ID Nos. EGEN-01** and **EGEN-02)** are subject to 40 CFR 63, Subpart ZZZZ because they are stationary reciprocating internal combustion engines. After the modification, only two emergency generators **(ID Nos. EGEN-01** and **EGEN-02)** shall remain subject to Subpart ZZZZ – all other sources have been decommissioned and are being removed from the permit completely.

The facility's two natural gas-fired Solar Titan 130 combustion turbines with dry low $NO_x$ **(ID Nos. ES-M/L17** and **ES-M/L18)** were previously subject to 40 CFR 63, Subpart YYYY because they are stationary combustion turbines and because the facility was a major source for HAPs. However, as part of this modification, the removal of several retired sources causes the facility's HAP emissions to drop below the major source thresholds (10 tons per year of any individual HAP and 25 tons per year of all HAPs combined), so the facility is now an area source for HAPs. Subpart YYYY only applies to major sources and is no longer applicable to this facility following the change.

On September 10, 2024, the EPA took action[4] to finalize requirements for sources that reclassify from major source status to area source status under the NESHAP program. Sources that are subject to certain NESHAP/MACT requirements for major sources must remain subject to the major source requirements even after reclassifying as an area source. The following rules are affected: 40 CFR 63, Subparts F, G, H, I, L, R, X, CC, GG, II, JJ, KK, LL, MM, EEE, HHH, JJJ, LLL, RRR, UUU, FFFF, JJJJ, MMMM, PPPP, ZZZZ, CCCCC, DDDDD, FFFFF, IIIII, LLLLL, YYYYY, JJJJJJ, and EEEEEEE. The facility's conditions for Subpart ZZZZ will be affected and the major source

[4] Federal Register: Review of Final Rule Reclassification of Major Sources as Area Sources Under Section 112 of the Clean Air Act

requirements of this subpart will remain in effect. However, the requirements for Subpart YYYY are not affected and will be removed as they are no longer applicable.

See the NESHAP/MACT review segment in Section 6 for more information. The facility owner or operator is responsible for complying with all applicable NESHAP/MACT requirements.

15A NCAC 02D .1400: Nitrogen Oxides – The facility's existing natural gas-fired dry low $NO_x$ combustion turbine **(ID No. ES-M/L16)** and two natural gas-fired Solar Titan 130 combustion turbines with dry low $NO_x$ **(ID Nos. ES-M/L17** and **ES-M/L18)** were previously subject to rules within 15A NCAC 02D .1400 "Nitrogen Oxides." According to 15A NCAC 02D .1402 "Applicability," rules 15A NCAC 02D .1407 through 1409(b) and .1413 apply to facilities with potential emissions of nitrogen oxides ($NO_x$) greater than or equal to 100 tons per year or 560 pounds per calendar day beginning May 1 through September 30 of any year in the following areas: Cabarrus County; Gaston County; Lincoln County; Mecklenburg County; Rowan County; Union County; and Davidson Township and Coddle Creek Township in Iredell County. Transco Station 150 is located near Mooresville, Iredell County, which is partially within the bounds of both Davidson and Coddle Creek Townships. Station 150 itself is located slightly southwest of the Mooresville urban center and is located within Davidson Township.

As of this permit modification, the facility no longer has potential emissions of $NO_x$ greater than 100 tons per year following the removal of several legacy sources - therefore, permit conditions related to this section were eligible to be removed. Specifically, the Station 150 facility was subject to conditions under 15A NCAC 02D .1408 that apply to stationary combustion turbines with heat inputs greater than 100 million Btu per hour but less than 250 million Btu per hour. This applied to all three of the facility's stationary combustion turbines **(ID Nos. ES-M/L16**, **ES-M/L17**, and **ES-M/L18)**, and conditions implementing that rule for all three turbines were initially planned to be removed from the permit. However, on April 21, 2025, Transco submitted a follow-up Part I 501(b)(2) application that would increase the facility's potential emissions of $NO_x$ to the point where they would once again be above 100 tpy. Since the return of this permit condition would be assured in the next permit issuance, consultant Kevin Eldridge indicated on April 29, 2025 that Transco would like the conditions for 15A NCAC 02D .1408 to remain in the permit. DAQ agreed with this request, and Sections 2.1 A.4 and B.3 implementing 15A NCAC 02D .1408 remains in the permit as part of this issuance.

15A NCAC 02D .1407, .1409(b), and .1413, the other rules in this section that apply to ozone maintenance areas, were not triggered as part of this modification.

According to 15A NCAC 02D .1402 "Applicability," rules 15A NCAC 02D .1409(c), .1418, ,1423, .1424, and .1425 apply statewide. 15A NCAC 02D .1409(c) does not apply to this facility because mainline engines #12, 13, 14, and 15 (specifically referenced in the rule) have been decommissioned and are no longer active. 15A NCAC 02D .1418 does not apply to this facility's lean-burn internal combustion engines because they have outputs of less than 2,400 brake horsepower. 15A NCAC 02D .1423 also does not apply to this facility's lean-burn internal combustion engines for the same reason. 15A NCAC 02D .1424 does not apply to this facility because no sources meeting the definition of "Large non-EGU" in 15A NCAC 02D .1401 "Definitions" are operated there. 15A NCAC 02D .1425 does not apply to this facility because it is unrelated to this facility and its operations.

15A NCAC 02D .1806: Control and Prohibition of Odorous Emissions – This rule applies facility-wide because the facility's sources can be reasonably expected to generate odorous emissions. The owner or operator of this facility shall not operate it without implementing management practices or installing and operating odor control equipment sufficient to prevent odorous emissions from causing

or contributing to objectionable odors beyond the facility's boundaries. According to the most recent inspection report[3], prepared by engineer Brian Huang of the Mooresville Regional Office and dated August 7, 2024, no odors were detected beyond the facility's boundary during inspection. Continued compliance is expected. Note that this is a **state-enforceable only** requirement.

**6. NSPS, NESHAPS/MACT, PSD, 112(r), CAM**

NSPS

The facility is currently subject to three New Source Performance Standards: 40 CFR 60, Subpart JJJJ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines; 40 CFR 60, Subpart KKKK: Standards of Performance for Stationary Combustion Turbines; and 40 CFR 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. This permit modification does not change the facility's NSPS status.

40 CFR 60, Subpart JJJJ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines – The facility's two natural gas-fired four-stroke lean-burn emergency generators **(ID Nos. EGEN-01** and **EGEN-02)** are subject to this subpart because they are stationary spark ignition internal combustion engines. For the purposes of this subpart, these engines are emergency engines, manufactured after January 1, 2009, have a maximum engine power greater than 19 kW (25 hp), and are not gasoline-fueled or LPG-fueled rich burn engines. [40 CFR 60.4230(a)(3)(iv)]

The facility owner or operator shall comply with the appropriate nitrogen oxide ($NO_x$), carbon monoxide (CO), and volatile organic compound (VOC) emission standards listed in Table 1 of 40 CFR 60, Subpart JJJJ for emergency engines with maximum engine power greater than or equal to 130 horsepower and any date of manufacture. The facility owner or operator shall comply with these emission standards by purchasing engines certified by the manufacturer for their respective model year, operating the engines in accordance with manufacturer specifications, operating the engines less than 50 hours per year for non-emergency purposes (testing, etc.), and using air-to-fuel ratio (AFR) controllers with three-way catalysts and/or non-selective catalytic reduction, if applicable.

| Engine Type and Fuel | Maximum Engine Power | Manufacture Date (after) | Emission Standards | | |
|---|---|---|---|---|---|
| | | | g/HP-hr (ppmvd @ 15% $O_2$) | | |
| | | | $NO_x$ | CO | VOC |
| Emergency | HP ≥ 130 | any | 2.0 (160) | 4.0 (540) | 1.0 (86) |

For monitoring purposes, each engine shall be equipped with a non-resettable hour meter. The facility owner or operator shall maintain records of all notifications submitted for compliance with this subpart, of all maintenance conducted on each engine, of the hours of operation of each engine (including the purpose for operating and the amount of time spent operating for non-emergency purposes), and of documentation that each engine meets the emission standards of this subpart. The facility owner or operator shall submit a summary report of their monitoring and recordkeeping activities on a semi-annual basis, as well as a copy of each performance test conducted within 60 days after the test is completed. As of February 26, 2025, the semi-annual report and performance test copies shall be submitted electronically via the EPA's Compliance and Emissions Data Reporting Interface (CEDRI).

According to the most recent inspection report[3], prepared by engineer Brian Huang of the Mooresville Regional Office and dated August 7, 2024, the equipment subject to this subpart was not in operation by the time of inspection. According to the cover letter included with Application No. 4900225.24A[1], the equipment was installed in May of 2024 and entered service on October 2, 2024.

This subpart has been updated once since the last permit issuance. The last permit issuance was issued on July 26, 2023, and this subpart was updated on August 30, 2024. This update included substantial additions to electronic reporting requirements and made a small number of clarifications and corrections throughout the text of the rule. This permit modification will update the text of the permit condition(s) related to this subpart to incorporate these revisions where applicable.

40 CFR 60, Subpart KKKK: Standards of Performance for Stationary Combustion Turbines – The facility's two natural gas-fired Solar Titan 130 combustion turbines with dry low $NO_x$ **(ID Nos. ES-M/L17** and **ES-M/L18)** are subject to this subpart because they are stationary combustion turbines with maximum heat inputs greater than 10.7 gigajoules (10 million Btu) per hour that commenced construction, reconstruction, or modification after February 18, 2005. [40 CFR 60.4300 and 4305(a)] The two turbines shall be considered new natural gas-fired turbines for the purposes of this subpart as they are newly constructed (not modified or reconstructed) and shall fire natural gas from the pipeline.

The facility owner or operator shall comply with the appropriate nitrogen oxide ($NO_x$) emission standards listed in Table 1 of 40 CFR 60, Subpart KKKK for new natural gas-fired turbines. $NO_x$ emissions shall not exceed 25 parts per million (ppm) at 15 percent $O_2$, and fuel sulfur content shall not exceed 0.060 lb per million Btu heat input. If turbines are operated at less than 75% of peak load or less than 0 °F, $NO_x$ emissions shall be below 150 ppm at 15 percent $O_2$.

| Combustion Turbine Type | Combustion Turbine Heat Input at Peak Load (HHV) | $NO_x$ Emission Standard |
|---|---|---|
| New turbine firing natural gas | > 50 MMBtu/h and ≤ 850 MMBtu/h | 25 ppm @ 15% $O_2$ |

The facility owner or operator shall demonstrate compliance with the above $NO_x$ emission limits by conducting an initial performance test within 60 days after achieving the maximum production rate at which the facility shall be operated, but no later than 180 days after the initial startup of each turbine. To demonstrate continued compliance, the facility owner or operator has two options. If they elect to use water or steam injection to control $NO_x$ emissions, they shall either install, calibrate, operate, and maintain a continuous monitoring system to monitor and record the fuel consumption and ratio of water or steam to fuel being fired in the turbine when burning a fuel that requires water or steam injection for compliance, or they shall install a continuous emissions monitoring system (CEMS) according to the procedures in 40 CFR 60.4335(b)(1), (2), (3), or (4). If they elect not to use water or steam injection to control $NO_x$ emissions, they shall either perform annual $NO_x$ performance tests or install, calibrate, operate, and maintain a continuous monitoring system according to the requirements of 40 CFR 60.4340(b)(1) or (2). The facility owner or operator shall demonstrate compliance with the fuel sulfur content limit either through monitoring according to the procedures in 40 CFR 60.4370 and 60.4415, the submittal of a current and valid purchase contract, tariff sheet, or transportation contract certifying compliance, or representative fuel sampling data demonstrating compliance.

The facility owner or operator shall maintain records of all measurements and data collected for compliance with this subpart and of the occurrence and duration of any startup, shutdown, or malfunction, or any periods when the CEMS is not operating (if applicable). The facility owner or operator shall submit a written report of the results of any performance conducted within 60 days of the completion of the test and a summary report of all monitoring and recordkeeping activities on a semi-annual basis. The facility owner or operator shall also submit a summary report of all fuel purchase contracts, tariff sheets, or transportation contracts. The facility owner or operator shall provide DAQ with at least 30 days prior notice of any performance test and shall submit a notification of the date of commencement of construction of an affected facility no later than 30 days after commencement and a notification of the actual date of initial startup of an affected facility within 15 days after startup.

According to the most recent inspection report[3], prepared by engineer Brian Huang of the Mooresville Regional Office and dated August 7, 2024, the equipment subject to this subpart was not in operation by the time of inspection. According to the cover letter included with Application No. 4900225.24A, the equipment was installed in May of 2024 and entered service on October 2, 2024.

This subpart has not been updated since the last permit issuance. The last permit issuance was issued on July 26, 2023, and included conditions for this subpart for the first time. This subpart was last updated on December 7, 2020. No changes are needed to the permit text for this subpart.

<u>40 CFR 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</u> – The facility is subject to this subpart because it is in the crude oil and natural gas source category and because it was modified after September 18, 2015 and on or before December 6, 2022. The facility recently removed several legacy sources and installed in their place two natural gas-fired Solar Titan 130 combustion turbines with dry low $NO_x$ **(ID Nos. ES-M/L17** and **ES-M/L18)** and two natural gas-fired four-stroke lean-burn emergency generators **(ID Nos. EGEN-01** and **EGEN-02)**, triggering this rule. Even though the initial (Part I) permit for this modification was issued in 2023, Transco states that the turbines were purchased on June 22, 2022, which is still before the cutoff where the applicability of this subpart ends and the applicability of Subpart OOOOb begins. Equipment associated with the turbines and natural gas transmission equipment is subject to requirements under this rule.

The crude oil and natural gas source category, according to 40 CFR 60.5430a, includes both crude oil production (including the well and extends to the point of custody transfer to the crude oil transmission pipeline or any other forms of transportation) and natural gas production, processing, transmission, and storage (which include the well and extend to, but do not include, the local distribution company custody transfer station). This facility is a natural gas transmission facility and is included within the scope of this subpart. Affected facilities under this subpart include the applicable provisions of one or more of the onshore affected facilities listed in 60.5365a within the crude oil and natural gas production source category that was modified after September 18, 2015 and on or before December 6, 2022. These facilities are as follows:

- Well completions
- Centrifugal compressors (using wet seals)
- Reciprocating compressors
- Pneumatic controllers
- Storage vessels
- Equipment at onshore natural gas processing plants

- Sweetening units
- Pneumatic pumps
- Fugitive emissions from well sites
- Fugitive emissions from compressor stations

According to the application[1], Transco states that the proposed project will not include any affected facilities with requirements related to well sites, natural gas processing, centrifugal compressors with wet seals, reciprocating compressors, or storage vessels with VOC emissions greater than 6 tons per year. Transco states that the centrifugal compressors associated with the combustion turbines will comply with this subpart by installing dry gas seals, and the requirements for centrifugal compressors will not apply to this subpart. The proposed project will include pneumatic controllers and fugitive emissions from equipment components located at a compressor station and will be subject to requirements for these affected sources. [40 CFR 60.5365a(d) and (i)]

For each pneumatic controller affected facility, the facility owner or operator shall comply with the greenhouse gas (GHG) and volatile organic compound (VOC) standards, based on natural gas as a surrogate for GHG and VOC, in either 40 CFR 60.5390a(b) or (c). For pneumatic controller affected facilities at natural gas processing plants, the natural gas bleed rate shall be zero. For pneumatic controller affected facilities at locations other than natural gas processing plants, the natural gas bleed rate shall be less than or equal to 6 standard cubic feet per hour. Each pneumatic controller affected facility shall be tagged with the month and year of installation, reconstruction, or modification, and identifying information that allows traceability to the records for that specific controller as required in 40 CFR 60.5420a(c)(4). Affected sources can be exempted from this subpart if it is determined that the use of a pneumatic controller affected facility with a bleed rate greater than the applicable standard is required based on functional needs, although the tagging requirements still apply.

For each collection of fugitive emissions components at well sites or compressor stations, the facility owner or operator shall reduce GHG (in the form of a limitation on methane) and VOC emissions by complying with the requirements of 40 CFR 60.5937a(a) through (j). The facility owner or operator shall develop an emissions monitoring plan that covers the collection of fugitive emissions components at the compressor station within each company-defined area, including survey frequency, determination technique, manufacturer and model number of detection equipment to be used, procedures and timeframes for identifying and repairing fugitive emissions components from which fugitive emissions are detected, procedures and timeframes for verifying fugitive emission component repairs, and the records that will be kept and for how long. Special requirements apply for those using optical gas imaging and those using Method 21 of Appendix A-7 to determine fugitive emissions. An initial monitoring survey shall be conducted within 90 days of startup of a new compressor station for each collection of fugitive emissions components at the new station. Subsequent monitoring surveys shall be conducted at least quarterly after the initial survey, no less than 60 days apart. Each identified source of fugitive emissions shall be repaired at least 30 calendar days after detection. If the first attempt fails, repairs shall be completed as soon as practicable but no later than 30 days after the first attempt.

The facility owner or operator shall maintain the records as specified in 40 CFR 60.7(f) and 40 CFR 60.5420a(c)(1) through (18) for at least 5 years. Records required to be submitted electronically may be maintained in electronic format. A summary report of the above monitoring and recordkeeping activities shall be submitted on an annual basis.

This subpart has been updated four times since the last permit issuance. This subpart was updated on March 8, 2024, on May 7, 2024, on May 10, 2024, and on August 1, 2024, and the last permit

issuance was issued on July 26, 2023. The March 8, 2024 update added requirements for the control of greenhouse gases and modifies several existing requirements for VOC and $SO_2$ emissions. The May 7, 2024 update implements these changes directly into the text of the rule. The May 10, 2024 update removes initial compliance requirements not relevant to this facility. The August 1, 2024 update corrects cross-references and typographical errors. This permit modification will update the text of the permit condition(s) related to this subpart to include these revisions where applicable.

NESHAP/MACT

Following the removal of several sources as part of this modification, the facility is now an area source for hazardous air pollutants (HAPs). The facility is currently subject to one Maximum Achievable Control Technology standard: 40 CFR 63, Subpart ZZZZ: National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. This permit modification changes the facility's MACT status to remove conditions related to 40 CFR 63, Subpart YYYY: National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines.

40 CFR 63, Subpart YYYY: National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines – The facility's two natural gas-fired Solar Titan 130 combustion turbines with dry low $NO_x$ **(ID Nos. ES-M/L17** and **ES-M/L18)** are no longer subject to this rule. These two sources are stationary combustion turbines and were previously subject to this rule because the Station 150 facility was a major source of HAPs prior to the removal of several legacy sources **(ID Nos. ES-M/L1** through **ES-M/L15**, **ES-AUX1** through **ES-AUX3**, and **ES-A/C5** and **ES-A/C6)**. As part of this modification, these legacy sources are being removed, and the facility will no longer emit more than 10 tons per year of any single HAP or 25 tons per year of total HAPs. The facility is now classified as an area source of HAPs, so this subpart no longer applies. Any conditions related to this subpart will be removed from the permit text.

Please note that the facility's existing natural gas-fired dry low $NO_x$ combustion turbine **(ID No. ES-M/L16)** was also subject to this subpart but is not being considered as part of this modification. Conditions related to Subpart YYYY for this source will be removed because the reclassification from major source for HAPs to area source affects all sources facility-wide.

On September 10, 2024, the EPA took action[4] to finalize requirements for sources that reclassify from major source status to area source status under the NESHAP program. Sources that are subject to certain NESHAP/MACT requirements for major sources must remain subject to the major source requirements even after reclassifying as an area source. However, Subpart YYYY is not one of those requirements, so the removal of applicability for this subpart due to the reclassification of the facility will not be affected.

40 CFR 63, Subpart ZZZZ: National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines – The facility's two natural gas-fired four-stroke lean-burn emergency generators **(ID Nos. EGEN-01** and **EGEN-02)** are subject to this subpart because they are stationary reciprocating internal combustion engines. Several legacy sources **(ID Nos. ES-M/L1** through **ES-M/L15**, **ES-AUX1** through **ES-AUX3**, and **ES-A/C5** and **ES-A/C6)** were subject to this rule but are being removed from the permit as part of this modification as they have been decommissioned. For the purposes of this subpart, the two emergency generators are considered new stationary RICEs as they are located at an area source for HAPs and were constructed on or after June 12, 2006. [40 CFR 63.6590(a)(2)(iii)] The Transco Station 150 facility has become an area source for HAPs following the removal of several legacy sources as part of this modification, and the facility will no longer emit more than 10 tons per year of any single HAP or 25 tons per year of total HAPs.

As part of this modification, the fifteen two-stroke natural gas lean-fired internal combustion engines **(ID Nos. ES-M/L1** through **ES-M/L15)**, three four-stroke natural gas rich-fired internal emergency combustion engines **(ID Nos. ES-AUX1** through **ES-AUX3)**, and two four-stroke natural gas rich-fired internal emergency combustion engines **(ID Nos. ES-A/C5** and **ES-A/C6)** are being retired and will be removed from the permit. The two natural gas-fired four-stroke lean-burn emergency generators **(ID Nos. EGEN-01** and **EGEN-02)** were added as part of the previous application (Application No. 4900225.22A[2], Part 1 of the 501(b)(2) modification).

According to 40 CFR 63.6590(c)(1), new or reconstructed stationary RICE located at an area source shall meet the requirements of this subpart by meeting the requirements of 40 CFR 60, Subpart IIII for compression ignition engines, and 40 CFR 60, Subpart JJJJ for spark ignition engines. However, Subpart ZZZZ is one of several NESHAP requirements affected by EPA's action on sources that reclassify from major source status to area source status under the NESHAP program. On September 10, 2024, the EPA took action to finalize requirements for sources that reclassify from major source status to area source status for hazardous air pollutants. Sources that are subject to certain NESHAP/MACT requirements for major sources (including those in Subpart ZZZZ) must remain subject to the major source requirements even after reclassifying as an area source. To maintain consistency with this action, the two generators **(ID Nos. EGEN-01** and **EGEN-02)** shall remain subject to the major source requirements of Subpart ZZZZ. Instead, according to 40 CFR 63.6590(b)(1)(i), the two generators do not have to meet the requirements of this subpart or Subpart A (General Provisions), except for the initial notification requirements of 40 CFR 63.6645(f). According to the most recent annual compliance certification[5], received by the Mooresville Regional Office on February 28, 2025, the required notifications were submitted on August 18, 2022 for the two generators.

This subpart has been updated once since the last permit issuance. This subpart was updated on August 30, 2024, and the last permit issuance was issued on July 26, 2023. This update included substantial additions to electronic reporting requirements and made a small number of clarifications and corrections throughout the text of the rule. As mentioned above, the facility owner or operator shall demonstrate compliance with this subpart by meeting the requirements of another. The recent updates to this subpart do not affect this status, so no changes to the permit text are needed.

PSD

Compressor Station 150 is included in Transco's Emissions Reduction Program (ERP) and, as part of this modification, Transco has retired several aging sources and replaced them with newer ones. This includes the retirement of fifteen existing two-stroke, lean-burn (2SLB) mainline compressor engines **(ID Nos. ES-M/L1** through **ES-M/L15)**, which were replaced by two natural gas-fired Solar Titan 130-23502S combustion turbines **(ID Nos. ES-M/L17** and **ES-M/L18)**. This also includes the retirement of three existing emergency-use generator engines **(ID Nos. ES-AUX1** through **ES-AUX3)** and two air compressor engines **(ID Nos. ES-A/C5** and **ES-A/C6)**, which were replaced by two natural gas-fired four-stroke, lean-burn (4SLB) emergency generator engines **(ID Nos. EGEN-01** and **EGEN-02)**. Ancillary equipment was also added, including one natural gas condensate liquid storage tank **(ID No. I-TANK-01)**, one oily wastewater storage tank **(ID No. I-TANK-02)**, natural gas venting operations associated with maintenance, startup, and shutdown of the two new Solar Titan 130 combustion turbines, natural gas venting operations associated with pipeline pigging **(ID No. I-PIGGING)**, piping component fugitive emissions **(ID No. I-FUGS-NEW)**, and truck loadout operations associated with the storage tanks **(ID No. I-TTLO)**. A summary of the pre- and post-modification potential emissions, as well as increases and decreases in potential emissions associated with the project, are included in the emissions

[5] AQ_F_4900225_20250227_CMPL_ACC

review in Section 8 below. This table was provided by the applicant in the cover letter of Application No. 4900225.22A[2].

Although the emissions increase from new sources for $NO_x$ and $PM_{2.5}$ (57.31 tpy and 11.60 tpy respectively) exceed the significant emission rate (SER) thresholds for PSD review, the emissions decrease resulting from the retirement of legacy sources is far more significant. The net emissions decrease is enough that the facility's total annual potential to emit after modification is below the major source threshold for PSD for all regulated NSR pollutants, so the facility will no longer be subject to PSD requirements. Any PSD avoidance conditions in the permit will be removed as they are no longer necessary.

112(r)

The facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the 112(r) thresholds. No change with respect to 112(r) is anticipated under this permit modification.

CAM

The CAM rule (40 CFR 64; 15A NCAC 02D .0614) applies to each pollutant specific emissions unit (PSEU) at facilities required to hold a Title V permit that meets all three following criteria:

- the unit is subject to any non-exempt (e.g., pre November 15, 1990, Section 111 or Section 112 standard) emission limitation or standard for the applicable regulated pollutant.
- the unit uses any control device to achieve compliance with any such emission limitation or standard.
- the unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source (i.e., 100 tons per year for criteria pollutants or 10/25 tons per year for HAPs).

None of the emission sources at this facility are equipped with control devices. Therefore, none of the facility's emission sources are subject to any CAM requirements. No change with respect to CAM is anticipated under this permit modification.

## 7. Facility Wide Air Toxics

As part of this modification, two air toxics modeling demonstrations were submitted by the facility for the periods of commissioning as well as the period after commissioning was complete, as discussed below. The first facility-wide toxic air pollutant dispersion modeling analysis[6] was received on September 8, 2022, and covered the period after commissioning. The second facility-wide toxic air pollutant dispersion modeling analysis[7] was received on June 19, 2023, and covered the period during commissioning. The results of these submissions were evaluated by engineer Ed Martin and AQAB meteorologists Justin McKee and Nancy Jones and discussed in Mr. Martin's permit review[8] for Air Permit No. 08044T19.

The period during commissioning refers to the 1-2 month period during which some of the existing legacy natural gas-fired reciprocating compression equipment could operate at the same time as the newly installed natural gas-fired replacement turbine compression equipment. The commissioning process involved intermittent runtime testing of the new replacement turbines for proper functionality while some

[6] AQ_F_4900225_20221018_MOD_ModRvw_pdf
[7] AQ_F_4900225_20230626_MOD_ModRvw
[8] AQ_F_4900225_20230726_PRMT_PmtRvw_T19

of the existing legacy compression equipment operated to ensure natural gas flow across the station to be transported along the Transco interstate pipeline system before the new turbines were placed into operational service. Due to Federal Energy Regulatory Commission (FERC) regulatory requirements, there cannot be simultaneous operation of the legacy reciprocating compression equipment (which must be permanently retired) and the new turbine compression equipment once the new turbines commence full in-service operation following commissioning. To ensure compliance with the ambient air quality standards, a supplemental toxics modeling analysis was prepared to evaluate potential toxic air pollutant emissions during the commissioning period, when a combination of existing (legacy) and new equipment may operate. The table below shows all permitted sources along with those sources that were evaluated in the modeling as potentially operating during the commissioning period and for the analysis after the commissioning period.

| Permitted Sources | Sources Operating During Commissioning | Sources Operating After Commissioning |
|---|---|---|
| ES-M/L1 | ES-M/L1 | *Retired* |
| ES-M/L2 | ES-M/L2 | *Retired* |
| ES-M/L3 | No operation allowed | *Retired* |
| ES-M/L4 | ES-M/L4 | *Retired* |
| ES-M/L5 | ES-M/L5 | *Retired* |
| ES-M/L6 | No operation allowed | *Retired* |
| ES-M/L7 | ES-M/L7 | *Retired* |
| ES-M/L8 | ES-M/L8 | *Retired* |
| ES-M/L9 | ES-M/L9 | *Retired* |
| ES-M/L10 | ES-M/L10 | *Retired* |
| ES-M/L11 | ES-M/L11 | *Retired* |
| ES-M/L12 | No operation allowed | *Retired* |
| ES-M/L13 | ES-M/L13 | *Retired* |
| ES-M/L14 | ES-M/L14 | *Retired* |
| ES-M/L15 | ES-M/L15 | *Retired* |
| ES-M/L16 | ES-M/L16* | ES-M/L16* |
| ES-AUX1 | ES-AUX1 | *Retired* |
| ES-AUX2 | ES-AUX2 | *Retired* |
| ES-AUX3 | ES-AUX3 | *Retired* |
| ES-A/C5 | ES-A/C5 | *Retired* |
| ES-A/C6 | ES-A/C6 | *Retired* |
| ES-M/L17 | ES-M/L17 | ES-M/L17 |
| ES-M/L18 | ES-M/L18 | ES-M/L18 |
| EGEN-01 | EGEN-01 | EGEN-01 |
| EGEN-02 | EGEN-02 | EGEN-02 |
| I-FUGS-NEW | I-FUGS-NEW | I-FUGS-NEW |
| I-SHB | I-SHB | I-SHB |
| I-DHB | I-DHB | I-DHB |
| I-PIGGING | I-PIGGING | I-PIGGING |
| I-M/L16-CB | I-M/L16-CB | I-M/L16-CB |
| I-M/L17-CB | I-M/L17-CB | I-M/L17-CB |
| I-M/L18-CB | I-M/L18-CB | I-M/L18-CB |
| I-TTLO | I-TTLO | I-TTLO |
| I-TANK-01 | I-TANK-01 | I-TANK-01 |

*Even though this source is not being retired, it was not included in the modeling for the scenario after commissioning as discussed below.

Commissioning Period

For the period of time when both new sources and legacy sources could operate (excluding ID Nos. ES-M/L3, ES-M/L6, and ES-M/L12), the applicant performed a facility-wide air toxics analysis for all permitted sources that could potentially be operating during the commissioning period. This included sources subject to National Emission Standards for Hazardous Air Pollutants (NESHAPs, alternatively MACT standards). Even though sources subject to MACT standards are not required to be modeled pursuant to 15A NCAC 02Q .0702(a)(27)(B), the applicant volunteered to include emissions for all such exempt sources in their modeling analysis submission.

The emission rate for sources ES-M/L3, ES-M/L6, and ES-M/L12 was set to zero in the model because these sources are not permitted to be operated during the commissioning period. Emissions from ES-M/L16 were not modeled because it is exempt from analysis pursuant to 15A NCAC 02Q .0702(18) as it was permitted prior to July 10, 2010. It was, however, included in a risk assessment (which determined that it posed no unacceptable risk), and emissions from blowdowns associated with this source were included.

According to the air toxics modeling demonstration[7] for the commissioning period, 1,3-butadiene, acrolein, benzene, ethylene dibromide, formaldehyde, and vinyl chloride were found to have potential emission rates that exceeded their respective toxic air pollutant (TAP) permitting emission rates (TPERs) found in 15A NCAC 02Q .0711: Emission Rates Requiring a Permit.

| TPER Evaluation During Commissioning Period | | | | | | |
|---|---|---|---|---|---|---|
| **Toxic Air Pollutant** | **Emission Rate (lb/hr)** | **TPER (lb/hr)** | **Emission Rate (lb/day)** | **TPER (lb/day)** | **Emission Rate (lb/yr)** | **TPER (lb/yr)** |
| 1,3-Butadiene | 2.53E-01 | - | 0.47 | - | 2143 | 11 |
| Acrolein | 2.4 | 0.02 | 54.8 | - | 2,009 | - |
| Benzene | 0.78 | - | 14.1 | - | 5,138 | 8.1 |
| Ethylene Dibromide | 2.52E-02 | - | 0.52 | - | 188 | 27 |
| Formaldehyde | 18.56 | 0.04 | 403.0 | - | 147,102 | - |
| Vinyl Chloride | 7.56E-03 | - | 0.17 | - | 63 | 26 |

The applicant demonstrated that, even for those toxic air pollutants for which the TPER was exceeded based on only combined emissions from new and legacy equipment (1,3-butadiene, ethylene dibromide, and vinyl chloride), the atmosphere would not see an increase for those toxics during the 1-2 month commissioning period because of the offset provided by not operating ES-M/L3, ES-M/L6, and ES-M/L12. For those toxic air pollutants for which the TPER was exceeded based on only emissions from new equipment (acrolein, benzene, and formaldehyde), further analysis was conducted using potential emissions to determine the resulting modeled ambient concentrations for comparison to the Acceptable Ambient Levels (AALs) in 15A NCAC 02D .1104. The emission rates were modeled based on 8,760 hours of operation per year. The results of this analysis are shown in the table below. This demonstration showed that the concurrent operation of new and existing equipment during the commissioning period would not pose excess risk to human health and the environment.

| Maximum Modeled Toxics Impacts During the Commissioning Period | | | | |
|---|---|---|---|---|
| **Pollutant** | **Averaging Period** | **Maximum Impact ($\mu g/m^3$)** | **AAL ($\mu g/m^3$)** | **Maximum Modeled Impact (% of AAL)** |
| Acrolein | 1-hour | 26.5 | 80 | 33% |
| Benzene | Annual | 0.11 | 0.12 | 92% |

| Maximum Modeled Toxics Impacts During the Commissioning Period | | | | |
|---|---|---|---|---|
| **Pollutant** | **Averaging Period** | **Maximum Impact ($\mu g/m^3$)** | **AAL ($\mu g/m^3$)** | **Maximum Modeled Impact (% of AAL)** |
| Formaldehyde | 1-hour | 105 | 150 | 70% |

This toxics dispersion modeling was reviewed and approved by Justin McKee of the Air Quality Analysis Branch (AQAB), and the analysis adequately demonstrates compliance with Acceptable Ambient Levels (AALs) on a source-by-source basis during the commissioning period. See Justin McKee's memo[7] to Ed Martin, dated June 26, 2023, for more information.

After any of the "new" sources **(ID Nos. ES-M/L17**, **ES-M/L18**, **EGEN-01**, and **EGEN-02)** are first fired, legacy sources ES-M/L3, ES-M/L6, and ES-M/L12 are not permitted to operate during the commissioning period. The facility owner or operator shall maintain records of the date and time of any operation of these sources. The permit toxic air pollutant emission limits in the table below will apply during commissioning.

| Permit Toxic Air Pollutant Emission Limits During Commissioning | | |
|---|---|---|
| **Emission Source** | **Toxic Air Pollutant** | **Emission Limit (lb/yr)** |
| I-SHB<br>Suction Header Blowdown | Benzene | 9.898E-02 |
| I-DHB<br>Discharge Header Blowdown | Benzene | 8.550E-02 |
| I-M/L16CB<br>M/L16 Compressor Blowdown | Benzene | 9.286E-02 |
| I-M/L17CB<br>M/L17 Compressor Blowdown | Benzene | 1.139E-02 |
| I-M/L18CB<br>M/L18 Compressor Blowdown | Benzene | 1.139E-02 |
| I-TTLO<br>Tanker Truck Loadout | Benzene | 2.383E-06 |
| I-FUGS<br>Piping connectors and equipment leaks | Benzene | 1.603E-01 |
| I-TANK-01<br>Natural gas condensate liquid storage tank | Benzene | 7.367E-03 |
| I-PIGGING<br>Pipeline pigging blowdowns | Benzene | 1.454+01 |

Post-Commissioning Period

For the period after all legacy sources were retired, the applicant performed a separate facility-wide air toxics analysis for all permitted sources that could potentially be operating after the commissioning period was complete. This includes sources subject to National Emission Standards for Hazardous Air Pollutants (NESHAPs, alternatively MACT standards). Even though sources subject to MACT standards are not required to be modeled pursuant to 15A NCAC 02Q .0702(a)(27)(B), the applicant volunteered to include emissions for all such exempt sources in their modeling analysis submission.

Emissions from ES-M/L16 were, again, not modeled because it is exempt from analysis pursuant to 15A NCAC 02Q .0702(18) as it was permitted prior to July 10, 2010. It was, however, included in a

risk assessment (which determined that it posed no unacceptable risk), and emissions from blowdowns associated with this source were included.

According to the air toxics modeling demonstration[6] for the post-commissioning period, acrolein, benzene, and formaldehyde were found to have potential emission rates that exceeded their respective toxic air pollutant (TAP) permitting emission rates (TPERs) found in 15A NCAC 02Q .0711: Emission Rates Requiring a Permit.

| TPER Evaluation After Commissioning Period | | | | | | |
|---|---|---|---|---|---|---|
| **Toxic Air Pollutant** | **Emission Rate (lb/hr)** | **TPER (lb/hr)** | **Emission Rate (lb/day)** | **TPER (lb/day)** | **Emission Rate (lb/yr)** | **TPER (lb/yr)** |
| Acrolein | 0.16 | 0.02 | 0.26 | - | 96.01 | - |
| Benzene | 0.20 | - | 0.19 | - | 69.73 | 8.1 |
| Formaldehyde | 2.34 | 0.04 | 13.71 | - | 5,005.78 | - |

For those toxic air pollutants for which the TPER was exceeded, further analysis was conducted using potential emissions to determine the resulting modeled ambient concentrations for comparison to the Acceptable Ambient Levels (AALs) in 15A NCAC 02D .1104. The emission rates were modeled based on 8,760 hours of operation per year. The results of this analysis are shown in the table below. This demonstration showed that the concurrent operation of new equipment after the commissioning period would not pose excess risk to human health and the environment.

| Maximum Modeled Toxics Impacts After the Commissioning Period | | | | |
|---|---|---|---|---|
| **Pollutant** | **Averaging Period** | **Maximum Impact ($\mu g/m^3$)** | **AAL ($\mu g/m^3$)** | **Maximum Modeled Impact (% of AAL)** |
| Acrolein | 1-hour | 2.46 | 80 | 3% |
| Benzene | Annual | 0.00423 | 0.12 | 4% |
| Formaldehyde | 1-hour | 25.1 | 150 | 17% |

This toxics dispersion modeling was reviewed and approved by Nancy Jones of the Air Quality Analysis Branch (AQAB), and the analysis adequately demonstrates compliance with Acceptable Ambient Levels (AALs) on a source-by-source basis after the commissioning period. See Nancy Jones' memo[6] to Ed Martin, dated October 18, 2022, for more information.

No monitoring of toxic air pollutants is required after the commissioning period is complete because of the wide margin of compliance with the respective AALs as shown above. The permit toxic air pollutant emission limits in the table below will apply after the commissioning period is complete.

| Permit Toxic Air Pollutant Emission Limits After Commissioning | | |
|---|---|---|
| **Emission Source** | **Toxic Air Pollutant** | **Emission Limit (lb/yr)** |
| I-SHB<br>Suction Header Blowdown | Benzene | 9.898E-02 |
| I-DHB<br>Discharge Header Blowdown | Benzene | 8.550E-02 |
| I-M/L16CB<br>M/L16 Compressor Blowdown | Benzene | 9.286E-02 |
| I-M/L17CB<br>M/L17 Compressor Blowdown | Benzene | 1.139E-02 |
| I-M/L18CB<br>M/L18 Compressor Blowdown | Benzene | 1.139E-02 |

| Permit Toxic Air Pollutant Emission Limits After Commissioning | | |
|---|---|---|
| **Emission Source** | **Toxic Air Pollutant** | **Emission Limit (lb/yr)** |
| I-TTLO<br>Tanker Truck Loadout | Benzene | 2.383E-06 |
| I-FUGS<br>Piping connectors and equipment leaks | Benzene | 1.603E-01 |
| I-TANK-01<br>Natural gas condensate liquid storage tank | Benzene | 7.367E-03 |
| I-PIGGING<br>Pipeline pigging blowdowns | Benzene | 1.454+01 |

Toxics Limits in the Permit

With the removal of the legacy sources and the startup of the new sources, the commissioning period is complete. Toxic air pollutant emission limits in the permit for the commissioning period are no longer necessary and will be removed as part of this modification. The emission limits applicable to the post-commissioning period will remain.

## 8. Facility Emissions Review

The facility-wide potential emissions are changing as part of this permit modification. Actual emissions for criteria pollutants and HAPs for the previous five years reporting periods are provided in the header of this permit review. A summary of the pre- and post-modification potential to emit (PTE), as well as increases and decreases in PTE associated with the project, are included in the table below. This table was provided by the applicant in the cover letter of Application No. 4900225.22A[2] and verified during processing.

| **Description of Emissions** | **Annual Potential Emissions in Tons Per Year (tpy)** | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | **$NO_x$** | **CO** | **VOC** | **$SO_2$** | **PM** | **$PM_{10}$** | **$PM_{2.5}$** | **Single HAP** | **Total HAPs** |
| Pre-Modification PTE | 3,031.78 | 886.58 | 440.61 | 2.82 | 65.06 | 65.06 | 65.06 | 184.75 | 265.76 |
| Project Increases from "New" Sources | 57.31 | 51.45 | 16.57 | 5.96 | 11.60 | 11.60 | 11.60 | 0.75 | 1.52 |
| Project Decreases from Equipment Retirement | 3,001.04 | 855.39 | 437.04 | 0.74 | 61.04 | 61.04 | 61.04 | 182.99 | 263.81 |
| **Total New Site-Wide** | **88.04** | **82.64** | **20.14** | **8.04** | **15.62** | **15.62** | **15.62** | **2.51** | **3.47** |

The decrease in potential emissions is such that the facility is no longer classified as a major source for PSD or for hazardous air pollutants (HAPs). The facility's potential to emit all regulated NSR pollutants is below 250 tons per year, and the facility's potential to emit HAPs is below the HAP major source thresholds (10 tons per year of any single HAP, and/or 25 tons per year of all HAPs combined). As a result, the facility's requirements with respect to HAPs and PSD will be changing as part of this permit modification. See the NESHAP regulatory review and PSD regulatory review in Section 6 for more information.

## 9. Compliance Status

DAQ has reviewed the compliance status of Transco Station 150. During the most recent inspection, conducted on August 7, 2024, the facility appeared to be in compliance with all applicable requirements. Further, the facility has had no air quality violations within the last five years. The facility's Annual

Compliance Certification[5] was received on February 28, 2025, and indicated compliance with all applicable requirements in 2024.

## 10. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit shall be provided to EPA. Also pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 02Q .0521 above. The facility is within 50 miles of the Mecklenburg and Forsyth local air authorities, and within 50 miles of South Carolina. Regardless of distance, all potential affected states and local air authorities will be notified in accordance with DAQ policy.

Public Notice of the Draft Title V Permit ran from XXXXX XX, XXXX, to XXXXX XX, XXXX. No comments were received.

EPA's 45-day review period ran concurrent with the 30-day Public Notice, from XXXXX XX, XXXX, to XXXXX XX, XXXX. No comments were received.

## 11. Other Regulatory Considerations

- A P.E. seal is NOT required for this modification application.
- A zoning consistency determination is NOT required for this modification application.
- A permit fee is NOT required for this modification application.

## 12. Recommendations

The permit modification application for Transco Station 150 has been reviewed by DAQ to determine compliance with all procedures and requirements. DAQ has determined this facility is complying or will achieve compliance, as specified in the permit, with all requirements that are applicable to the affected sources. DAQ recommends the issuance of Air Permit No. 08044T20.