

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

**Application Review**

Issue Date: **December 5, 2024**

Region: Winston-Salem Regional Office  
 County: Rockingham  
 NC Facility ID: 7900131  
 Inspector's Name: Thomas Gray  
 Date of Last Inspection: 04/17/2024  
 Compliance Code: 3 / Compliance - inspection

**Facility Data**  
 Applicant (Facility's Name): Transcontinental Gas Pipe Line Company, LLC - Station 160  
 Facility Address:  
 Transcontinental Gas Pipe Line Company, LLC - Station 160  
 4300 NC Highway 65  
 Reidsville, NC 27320  
 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 02Q .0504  
 NSPS: NA  
 NESHAP: NA  
 PSD: NA  
 PSD Avoidance: NA  
 NC Toxics: NA  
 112(r): NA  
 Other: NA

Contact Data		
Facility Contact	Authorized Contact	Technical Contact
Joseph Page Sr. Operations Manager (336) 361-3003 4300 NC Highway 65 Reidsville, NC 27320	Glen Jasek VP GM Eastern Interstates (713) 215-2134 2800 Post Oak Blvd, Suite 600 Houston, TX 77056+6146	Michael Callegari Senior Environmental Specialist (832) 794-0612 2800 Post Oak Boulevard, Suite 600 Houston, TX 77056+6147

**Application Data**  
 Application Number: 7900131.24B and .24A  
 Date Received: 06/18/2024  
 Application Type: Modification  
 Application Schedule: TV-Sign-501(b)(2) Part II  
 Existing Permit Data  
 Existing Permit Number: 09113/T16  
 Existing Permit Issue Date: 01/30/2024  
 Existing Permit Expiration Date: 09/30/2027

Total Actual emissions in TONS/YEAR:							
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2022	0.3900	1302.51	115.47	435.85	23.53	70.33	50.72[Formaldehyde]
2021	0.4200	1447.47	110.49	448.27	23.45	68.56	49.45 [Formaldehyde]
2020	0.2500	1396.78	98.17	414.97	20.40	60.69	43.75 [Formaldehyde]
2019	0.2200	1340.51	73.24	367.30	16.09	44.64	32.18 [Formaldehyde]
2018	0.0700	337.51	32.30	111.94	5.74	17.26	12.45 [Formaldehyde]

Review Engineer: Ed Martin  
 Review Engineer's Signature: *Edward L Martin*  
 Date: December 5, 2024

**Comments / Recommendations:**  
 Issue 09113/T17  
 Permit Issue Date: 12/05/2024  
 Permit Expiration Date: 09/30/2027

## 1. Purpose of Application

### Application 7900131.24B

Transcontinental Gas Pipe Line Company, LLC (Transco), a subsidiary of The Williams Companies, Inc., submitted a Part II permit application for Compressor Station 160 in accordance with permit condition 2.2 C.2.a of the current Permit 09113T16 for completion of the two-step significant modification Title V process initiated by Application No. 7900131.22A. This condition requires the Permittee to file an amended application following the procedures of Section 15A NCAC 02Q .0500 within one year from the date of beginning operation of any of the sources added in the Part I application (ID Nos. ES-M/L17, ES-M/L18, AUX-04, AUX-05, and EGEN-01). Transco submitted the Part II application on June 18, 2024, and submitted notification on May 14, 2024, stating that beginning of operation occurred on May 7 and 8, 2024. Transco submitted the Part I permit Application 7900131.22A for this equipment on July 14, 2022, which resulted in issuance of permit 09113T15 on April 24, 2023.

The following new sources added in Part I will remain in the permit:

- Two natural gas-fired Solar Titan 130-23502S combustion turbines (ES-M/L17 and ES-M/L18)
- Three natural gas-fired four-stroke, lean-burn (4SLB) generator engines, one of which will be an emergency-use unit (EGEN-01), and two will be non-emergency units (AUX-04 and AUX-05)

With the Part II permit, the following sources are now permanently retired and are being removed from the permit:

- 15 existing two-stroke, lean-burn (2SLB) mainline compressor engines (ES-M/L1 through ES-M/L15)
- Boiler (ES-BLR2)
- Three existing emergency-use generator engines (ES-AUX1 through ES-AUX3)
- One air compressor engine (ES-A/C1)

The existing natural gas-fired dry low NO<sub>x</sub> combustion turbine (ES M/L16) will also remain in the permit

The technical review for the Part I application (7900131.22A) is included as Attachment A to this document.

### Application 7900131.23A Minor Permit Modification Permit 09113T16 issued January 30, 2024

In this application, Transco requested two major changes to the existing permit 09113T15 to allow the facility to qualify as a minor source of HAPs. The first change requested was to revise the 40 CFR Part 63, Subpart ZZZZ Maximum Achievable Control Technology (MACT) requirements for the two non-emergency generators (AUX-04 and AUX-05) in Section 2.1 F.4 of the permit from the major HAP requirements to the area source requirements. The other change was to add a HAP MACT avoidance condition in Section 2.2 B.5 of the permit.

When the Part I permit 09113T15 was written, the facility was a major source of HAPs. Transco wanted the above changes to enable the facility to demonstrate that it qualifies as a minor source of HAP with the addition of a MACT avoidance condition and the removal of existing legacy equipment. This allowed the facility to address the commissioning period during which time the new equipment added in Permit No. 09113T15 was to begin to operate intermittently while some of the existing equipment was to continue to operate.

The technical review for the Minor Mod application (7900131.23A) is included as Attachment B to this document.

### Application 7900131.24A Reopen for Cause

This application was created by DAQ with the intention of reopening Transco's permit 09113T16 for cause pursuant to the process in rule 15A NCAC 02Q .0517 to correct a material mistake in Section 2.1 E.2.f of the permit where the use of a continuous emissions monitoring system (CEMS) to monitor nitrogen oxide (NO<sub>x</sub>) emissions is a permit requirement for combustion turbines (ID Nos. ES-M/L17 or ES-M/L18). In Section 2.1 E.2.d of the permit, an initial performance test is required to demonstrate compliance with the 40 CFR Part 60 Subpart KKKK NO<sub>x</sub> emission limits, and annual performance tests are also required. The use of a CEMS is a monitoring option under Subpart KKKK, to demonstrate continuous compliance with the NO<sub>x</sub> emission limit instead of the annual performance tests. Subpart KKKK specifies annual performance tests must be performed to demonstrate continuous compliance in 40 CFR 60.4340(a) even though, as described in 40 CFR 60.4340(b), it allows the use of

CEMS as an alternative monitoring option to the annual performance tests. It was not made clear when the permit was written and needs to be corrected to indicate that the use of a CEMS is an option to the annual performance tests. This change is shown in the Section 4 permit changes below to the old (current) section 2.1 E.2.f.

Now that the Part II application 7900131.24B has been received, this change is consolidated with that application to provide for a single public notice and EPA review process.

This is a significant permit modification pursuant to 15A NCAC 02Q .0501(b)(2). A 30-day public notice and 45-day EPA review is required.

### SUMMARY

In summary, now that the commissioning period, as stated above, is over, and the equipment changes have been implemented as discussed above and in the attachments, the facility will be considered upon issuance of the revised permit to be a true minor source under PSD and a true HAP minor source (See Section 5 below). The Permit will be revised accordingly to remove conditions that no longer apply. See Section 4 for all substantial changes.

## **2. Facility Description**

Transco Compressor Station 160 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. Compressor Station 160 is located approximately 7 miles west of Reidsville in Rockingham County.

## **3. Application Chronology**

April 24, 2023	A 02Q TV-Sign-501(b)(2) Part I permit 09113T15 (7900131.22A) was issued (see attached Part I review).
January 30, 2024	A Minor modification (7900131.23A) was issued for permit 09113T16 (see attached Minor Mod review).
April 19, 2024	A reopen for cause application (7900131.24A) was initiated in IBeam. 4Those changes are consolidated into this Part II permit.
June 18, 2024	Application 7900131.24B was received and considered complete for processing on this date.
July 11, 2024	Sent draft permit for supervisor's review.
August 14, 2024	Sent an email to Michael Callegari to ask about commence construction dates for ES-M/L16, ES-M/L17, and ES-M/L18 as related to NSPS OOOOa applicability.
August 22, 2024	Michael Callegari responded with the commence construction information requested on August 14, 2024 above as related to the NSPS OOOOa applicability dates. Specifically, for ES-M/L16, he stated that construction had not commenced after September 18, 2015, as it should have to be subject to this rule. For ES-M/L17 and ES-M/L18, he stated construction did commence on or before December 6, 2022, as it should have to be subject to this rule.
August 29, 2024	Sent an email to Michael Callegari and Glen Jasek regarding the fact that there is no monitoring for nitrogen oxides emissions in Section 2.1 A.2 of the permit for combustion turbine ES-M/L16 under 02D .0524 NSPS Subpart GG and that DAQ needs to make corrections in the permit in order to comply with the monitoring requirements of 15A NCAC 02Q .0508(f). (see Section 5 below)
August 29, 2024	Sent an email to Michael Callegari, in response to his answer in his August 22, 2024 email above, stating that since turbine ES-M/L16 did not commence construction after September

18, 2015, it falls outside the applicability dates of NSPS OOOOa and therefore it is not subject to this regulation and will be removed in Section 2.2 B.1 of the permit. Also, for turbines ES-M/L17 and ES-M/L18, where Michael Callegari had stated in his August 22, 2024, email that construction did commence on or before December 6, 2022, there was some question whether this was the case since this date is before the Part I construction permit No. 09113T15 was issued on April 24, 2023 (see Section 5 below). Also, the Winston-Salem Regional Office (WSRO) had received a notification from Transco that construction commenced on these sources on July 26, 2023. (see Section 5)

- August 30, 2024 Had a Teams call with Transco (Michael Callegari, Joe Volker, Bill Scarpinato, and Ed Martin) to discuss proposed NOx testing and NSPS Subpart OOOOa applicability issues, that is regarding when construction commenced on ES-M/L17 and ES-M/L18.
  
- September 3, 2024 In an email from Michael Callegari, to follow up on the call on August 30, 2024 above, to concur that Williams-Transco would be willing to accept the proposed monitoring language (to cover 40 CFR Part 70) for existing ES-M/L16. (see Section 5, Turbine ES-M/L16 NOx Testing).
  
- In addition, he noted that the new ES-M/L17 and ES-M/L18 centrifugal compressors will be equipped with dry gas seals regarding applicability to 40 CFR Part 60, Subpart OOOOa.
  
- September 3, 2024 Michael Callegari sent an email to follow up on the call on August 30, 2024 above, explaining that the notification letter to the WSRO as discussed was for the start of on-site physical construction associated with the new combustion turbines ES-M/L17 and ES-M/L18 (foundations), pertaining to 40 CFR Part 60, Subpart KKKK. However, for purposes of applicability to 40 CFR Part 60, Subpart OOOOa, 40 CFR Part 60 Subpart A §60.2 defines “commenced construction” with respect to the definition of a new source. (see Section 5 below).
  
- September 23, 2024 Sent the draft permit to the Stationary Source Compliance Branch, Applicant, and the Winston-Salem Regional Office for review.
  
- October 2, 2024 Received Applicant’s comments on the draft permit.
  
- October 14, 2024 Sent the draft permit to 30-day public notice and 45-day EPA review.
  
- November 13, 2024 Public notice period ended. No comments were received.
  
- December 2, 2024 EPA’s comment period ended. No comments were received.
  
- December 5, 2024 Permit was issued.

#### 4. Permit Changes

The following changes were made to Air Permit No. 09113T16:\*

Old Page No.	Old Section	New Page No.	New Section	Description of Changes
Cover Letter	N/A	N/A	N/A	Amended permit numbers and dates.
4-5	1, table	4	1, table	Removed the following sources: ES-M/L1 through ES-M/L15, ES-AUX1 through ES-AUX3, ES-A/C1, and ES-BLR2.  Removed MACT YYYY designation for ES-M/L16, ES-M/L17 and ES-M/L18. Removed MACT designation from MACT/GACT ZZZZ designation for AUX-04, AUX-05, and EGEN-01.  Removed footnotes 1 and 2.  Added NSPS OOOOa for ES-M/L17 and ES-M/L18.
6-9	2.1 A	--	--	Removed this section for sources ID Nos. ES-M/L1 through ES-M/L10, ID Nos. ES-AUX1 through ES-AUX3, and ES-A/C1.  Relabeled remaining sections.
10-11	2.1 B	--	--	Removed this section for sources ID Nos. ES-M/L11 through ES-M/L15.
12	2.1 C, table	5	2.1 A, table	Removed 02D .1111 Subpart YYYY.  Removed 15A NCAC 02D .0524 (40 CFR Part 60, Subpart OOOOa).
13	2.1 C.3	--	--	Removed 02D .1111 Subpart YYYY.
--	--	6	2.1 A.2.e	Added performance testing for compliance with the NO <sub>x</sub> emission limit.
--	--	6	2.1 A.2.i and j	Added reporting for NO <sub>x</sub> emissions performance tests.
--	--	varies	2.1 B through D	Added noncompliance statements throughout for testing, monitoring and recordkeeping.
14-17	2.1 D	--	--	Removed this section for source ID No. ES-BLR2.
18	2.1 E, table	7	2.1 B, table	Removed: <ul style="list-style-type: none"> <li>• 15A NCAC 02D .1111 (40 CFR 63, Subpart YYYY)</li> <li>• 15A NCAC 02Q .0317 for avoidance of 15A NCAC 02D .0530 (PSD)</li> <li>• 15A NCAC 02Q .0504</li> </ul> Added 15A NCAC 02D .1100 for Toxic Air Pollutants.  Changed NSPS OOOOa from Section 2.2.B.1 to Section 2.1.B.3.
19	2.1 E.2.f	8	2.1 B.2.f	Revised first sentence to read: The Permittee may comply with the following NO <sub>x</sub> monitoring and recordkeeping requirements as an alternative to the annual performance tests required in Section 2.1 B.2.d (new section) above.
19	2.1 E.2.k	8	2.1 B.2.k	Added note stating: "This notification was made on May 14, 2024, stating that initial startup occurred on May 10, 2024."

Old Page No.	Old Section	New Page No.	New Section	Description of Changes
--	--	9-11	2.1 B.3	Relocated NSPS OOOOa from Section 2.2 D.1 to this section.  Updated new title of NSPS OOOOa to “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.”
20-23	2.1 E.3	--	--	Removed this condition for 02D .1111 Subpart YYYY.
24	2.1 F, table	12	2.1 C, table	Removed: <ul style="list-style-type: none"> <li>• 15A NCAC 02D .1111 (40 CFR Part 63, Subpart ZZZZ)</li> <li>• 15A NCAC 02Q .0317 for avoidance of 15A NCAC 02D .0530 (PSD)</li> <li>• 15A NCAC 02Q .0504</li> <li>• Removed note for Subpart ZZZZ stating: “Applies after the facility becomes a minor source of HAPs per Section 2.2 B.5”</li> </ul>
26	2.1 F.3.j	14	2.1 C.3.j	Revised to read: <u>If the engine is subject to performance testing as required by 40 CFR 60.4243(a)(2), the Permittee shall submit a copy of each performance test as conducted in 40 CFR 60.4244 within 60 days after the test has been completed. Beginning on February 26, 2025, performance tests shall be reported electronically according to 40 CFR 60.4245(f).</u>
26-31	2.1 F.4	--	--	Removed this section for 02D .1111 Subpart ZZZZ.
32	2.1 G, table	15	2.1 D, table	Removed: <ul style="list-style-type: none"> <li>• 15A NCAC 02D .1111 (40 CFR Part 63, Subpart ZZZZ)</li> <li>• 15A NCAC 02Q .0317 for avoidance of 15A NCAC 02D .0530 (PSD)</li> <li>• 15A NCAC 02Q .0504</li> </ul>
34	2.1 G.3.1	17	2.1 D.3.1	Revised to read: <u>If the engine is subject to performance testing as required by 40 CFR 60.4243(a)(2), the Permittee shall submit a copy of each performance test as conducted in 40 CFR 60.4244 within 60 days after the test has been completed. Beginning on February 26, 2025, performance tests shall be reported electronically according to 40 CFR 60.4245(f).</u>
35	2.1 G.4	--	--	Removed this section for 02D .1111 Subpart ZZZZ.
36-37	2.2 A.1	--	--	Removed this section for 02D .1409.
38-39	2.2 B.2	--	--	Removed this section for 02D .1100 toxics during the commissioning period.
39	2.2 B.3.a	19-20	2.2 A.2.a	Removed: “ <b>after the commissioning period</b> when all legacy sources have been permanently retired”  Added toxic limits for sources ES-M/L17 and ES-M/L18.
39	2.2 B.4.a	--	--	Removed this section for 02Q .0711 toxics during the commissioning period.
40	2.2 B.4.b	--	--	Removed: “ <b>after the commissioning period</b> when all legacy sources have been permanently retired”
41	2.2 B.5	--	--	Removed this section for 02D .1111 MACT avoidance.

Old Page No.	Old Section	New Page No.	New Section	Description of Changes
42	2.2 C.1	--	--	Removed this section for 02D .0530 PSD avoidance.
42	2.2 C.2	--	--	Removed this section for 02D .0504 to submit the Title V application.
43-45	2.2 D.1	--	--	Removed sources ES-M/L1 through ES-M/L15, ES-M/L16, ES-AUX1 through ES-AUX3, and ES-A/C1 from 15A NCAC 02D .0524 Subpart OOOOa.
48-55	4	24-31	4	Updated General Conditions to version 8.0 07/10/2024. This changed General Condition D in the first sentence from two copies to one copy of all documents.

\* This list is not intended to be a detailed record of every change made to the permit but a summary of those changes.

## 5. Regulatory Evaluation

Prior to the Part I permit (permit 09113T15), Compressor Station 160 was an existing major stationary source with respect to the PSD permitting program (for stationary sources other than one of the 28 listed source categories). However, with issuance of this Part II permit, the potential to emit of all criteria pollutants are less than the PSD threshold and the facility is no longer a major PSD source. Hence the existing PSD avoidance condition at Section 2.2 C.1 is no longer necessary.

In order to avoid applicability of 15A NCAC 02D .1111 for major sources, facility-wide emissions of HAPs must be less than less than 10 tons of any individual HAP and less than 25 tons of total combined HAP, per consecutive 12-month period. Now that the sources shown in Section 1 above have been permanently retired, the facility becomes a minor source of HAPs. In accordance with permit condition 2.2 B.5.f.ii, Transco notified the WSRO in a letter dated May 14, 2024 that process piping and fuel gas piping was disconnected on April 18, 2024 for sources ES-M/L1 through ES-M/L15, ES-BLR2, ES-AUX1 through ES-AUX3, and ES-A/C1. Thus, as indicated in the Table below, the facility-wide potential emissions of all sources permitted to operate after April 18, 2024 are less than 10 tpy of the largest single HAP and less than 25 tpy of total HAP, resulting in the facility becoming a true minor source of HAPs on that date. Hence the existing HAP avoidance condition at Section 2.2 B.5 of the current permit is no longer necessary.

Potential facility-wide emissions as permitted in the revised permit, which includes the removal of the existing PSD avoidance and HAP major avoidance conditions are summarized below as shown on page B-2 of Appendix C in the application:

Description of Emissions	Annual Emissions in Tons Per Year (tpy)									
	NO <sub>x</sub>	CO	VOC	SO <sub>2</sub>	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	Single HAP	Total HAPs	CO <sub>2e</sub>
Site-Wide Totals	148.40	168.99	39.83	7.41	20.69	20.69	20.69	6.41	9.30	262,263

**Notes:**

(1) Includes the installation of two new Solar Titan 130 combustion turbines, two non-emergency use generators, one emergency-use generator, and ancillary equipment and operations.

(2) Emission Point IDs ES-M/L1 – ES-M/L15, ES-AUX1-AUX3, ES-A/C1 have been retired from service.

### Amendment to 40 CFR Part 63 General Provisions Effective September 10, 2024

This EPA action amends the General Provisions of 40 CFR part 63 to require sources subject to certain major source NESHAP subparts to remain subject to those subparts regardless of whether they reclassify to area source status. Specifically, after September 10, 2024, sources that are subject to the NESHAPs used to reach the 90 percent requirements articulated in CAA section 112(c)(6) must remain subject to those NESHAPs even if they reclassify to area source status. DAQ has considered whether this could potentially apply in processing this

application where Transco is subject to MACT ZZZZ (one of the NESHAPs referenced in the amendment) for generators AUX-04, AUX-05, and EGEN-01; and is requesting a change to reclassify from a major source to area source status. As stated above, the current permit 09113T16 contains a HAP major avoidance condition in Section 2.2 B.5 requiring at Section 2.2 B.5.f.ii for the Permittee to notify the DAQ the date the facility became a minor source of HAPs, which is the date the operating restriction at Section 2.2 B.5.b was met.

Section 2.2 B.5.b reads as follows:

*Sources (ID Nos. AUX-04 and AUX-05) shall not operate until commissioning of sources (ID Nos. ES-M/L17 and ES-M/L18) has been completed, sources (ID Nos. ES-M/L17 and ES-M/L18) have been placed into service, and all reciprocating M/L engines have been permanently retired concurrently.*

Transco notified the WSRO in a letter dated May 14, 2024, that the facility met the operating restriction at Section 2.2 B.5.b on April 18, 2024 and hence became a HAP minor source on April 18, 2024.

Therefore, since Transco became a minor source of HAPs prior to the September 10, 2024 effective date of this amendment, the reclassification to an area source is not prohibited.

Since the operating restrictions imposed in Section 2.2 B.5.b have been met; the facility-wide potential emissions of all sources permitted to operate after April 18, 2024 were less than 10 tpy of the largest single HAP and less than 25 tpy of total HAP; and the facility-wide potential emissions of the remaining sources in the revised permit are less than 10 tpy of the largest single HAP and less than 25 tpy of total HAP, the facility is a true HAP minor source as of April 18, 2024 and the HAP avoidance condition in the current permit at Section 2.2 B.5 is no longer necessary. The HAP avoidance condition has been removed from the revised draft permit.

#### Turbine ES-M/L16 NOx Testing

The permit does not contain any monitoring for nitrogen oxides emissions for combustion turbine ES-M/L16 in Section 2.1 A.2 under 15A NCAC 02D .0524 for 40 CFR 60, Subpart GG (Standards of Performance for Stationary Gas Turbines). This is a dry-low NOx turbine which does not use steam or water injection to control NOx emissions and was constructed in 2003. Subpart GG does not require NOx emissions monitoring for such a turbine. However, unless Transco 160 has previously submitted and received "... EPA, State, or local permitting authority approval of a procedure for monitoring compliance with the applicable NOx emission limit under §60.332, that approved procedure may continue to be used," as stated in 40 CFR 60.334(c), DAQ needs to make corrections to comply with the monitoring and related recordkeeping and reporting requirements of 15A NCAC 02Q .0508(f). Transco was notified of this in an August 29, 2024, email, as discussed in Section 3 above. In a Teams call on August 30, 2024, Michael Callegari stated that Transco 160 had never such a monitoring procedure approved. Therefore, in order to satisfy the 15A NCAC 02Q .0508(f) requirements (i.e.40 CFR Part 70), NOx performance testing and reporting is being added in Sections 2.1 A.2.e, i and j of the permit.

In an email from Michael Callegari on September 3, 2024, he followed up on the call on August 30, 2024, to state that Williams-Transco would be willing to accept the proposed monitoring language (to cover 40 CFR Part 70) for existing ES-M/L16, similar to the following:

#### "Testing

*The Permittee shall demonstrate compliance with the emission limit in Section 2.# X.#.x above [i.e., 203.4 ppm NOx at 15 percent oxygen, dry (40 CFR Part 60, Subpart GG)] on an annual basis by testing the combustion turbine (ID No. ES-M/L16) in accordance with a testing protocol approved by the DAQ. Each test shall be conducted within 13 months of the previous stack test. If the results of this test are less than 90 percent of the emission limit in Section 2.# X.#.x above, the Permittee shall be required to stack test within 61 months of the previous stack test. If these testing requirements are not met, the Permittee shall be deemed in noncompliance with 15A NCAC ##X.####."*

#### NSPS Subpart OOOOa Applicability for ES-M/L16, ES-M/L17, and ES-M/L18

As noted above in Section 3 above, on August 29, 2024, DAQ informed Transco that since turbine ES-M/L16 did not commence construction after September 18, 2015, it falls outside the applicability dates of NSPS OOOOa and therefore it is not subject to this regulation and will be removed in Section 2.2 B.1 of the Part II permit.



At some point after the Part I permit was issued, the title of NSPS OOOOa was changed from “Standards of Performance for Crude Oil and Natural Gas Facilities For Which Construction, Modification, or Reconstruction Commenced After September 18, 2015” to “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.”

For turbines ES-M/L17 and ES-M/L18, in another email on August 29, 2024 (see Section 3 above), Transco stated that construction commenced on or before December 6, 2022. There was some question whether this was the case since this date is before the Part I construction permit No. 09113T15 was issued on April 24, 2023. According to records received at the WSRO, the construction notification dated July 28, 2023, for the two turbines indicated that the pads were poured, and construction commenced on July 26, 2023, which is after the applicability date in NSPS OOOOa. DAQ notified Transco that if this is true, these sources fall outside the current applicability dates of NSPS OOOOa (i.e., after December 6, 2022) and would not be subject to this regulation. In an email from Michael Callegari on September 3, 2024, he stated that the notification letter to the WSRO was for the start of on-site physical construction (on July 26, 2023) was associated with the new combustion turbines ES-M/L17 and ES-M/L18 (foundations), primarily pertaining to 40 CFR Part 60, Subpart A §60.7 through applicability to 40 CFR Part 60, Subpart KKKK and 40 CFR Part 63, Subpart YYYY. However, for purposes of applicability to 40 CFR Part 60, Subpart OOOOa, 40 CFR Part 60 Subpart A §60.2 defines the following:

***Commenced** means, with respect to the definition of new source in section 111(a)(2) of the Act, that an owner or operator has undertaken a continuous program of construction or modification or that an owner or operator has entered into a contractual obligation to undertake and complete, within a reasonable time, a continuous program of construction or modification.*

***Construction** means fabrication, erection, or installation of an affected facility.*

Transco states that the binding purchase order (i.e., contractual obligation to undertake a continuous program of construction) for the new turbine packages was executed by Williams-Transco with Solar Turbines in May 2022. Therefore, the purchase order date of May 2022 is prior to the NSPS OOOOa applicability construction end date of December 6, 2022, and the rule does apply to these turbines.

#### Dry Gas Seals on Centrifugal Compressors

According to the application applicability of NSPS Subpart OOOOa for the new turbines in the Part I review (attached) it states that affected facilities under NSPS Subpart OOOOa include centrifugal compressors with wet seals, and that Transco anticipates the centrifugal compressors associated with the combustion turbines will be equipped with dry gas seals and therefore the requirements for centrifugal compressors with wet seals do not apply to this project. When DAQ asked about this during the August 30, 2024 call, Michael Callegari, in an email on September 3, 2024, confirmed that the new ES-M/L17 and ES-M/L18 centrifugal compressors will be equipped with dry gas seals regarding applicability to 40 CFR Part 60, Subpart OOOOa. Therefore, requirements for centrifugal compressors with wet seals do not apply.

## **6. Facility-wide Toxics Demonstration**

When the Part I permit 09113T15 was written, the facility was a major source of HAPs. At that time, the toxic limits for all sources modeled, except for the sources exempt from air permitting as a 40 CFR Part 63 MACT source in accordance with 15A NCAC 02Q .0711(a)(27)(B), were shown in permit condition 2.2 B.3.a, as discussed in Section 8.B of the attached Part I toxics review for the period after commissioning. Now that the commissioning period is over and the facility is a minor source of HAPs, the Part 63 exemption is lost and toxic limits must be included in the permit for sources ES-M/L17 and ES-M/L18 which are no longer subject to MACT YYYY. These limits are now in Section 2.2 A.2.a of the permit.

As discussed in Section 8 of the Part I review, included as Attachment A below, the combustion turbine (ID No. ES-M/L16) was permitted prior to July 10, 2010, and therefore is still exempt from 15A NCAC 02D .1100 and 02Q .0700 pursuant to 15A NCAC 02Q .0702(a)(18) regardless of its MACT applicability status. Thus, it is not

subject to any emission limitations as presented in Section 2.2 A.2 of the revised permit. Also, as discussed in Section 8 of the Part I review, all MACT sources at that time, except for ES-M/L16, were included in the modeling.

The three generators (ID Nos. AUX-04, AUX-05, and EGEN-01 are all now subject to MACT ZZZZ for area sources and still retain their exemption from 15A NCAC 02Q .0700 pursuant to 15A NCAC 02Q .0711(a)(27)(B). Hence the change in the facility's status from HAP major to minor did not remove the toxics exemption from these sources.

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

Pursuant to 15A NCAC 02Q .0521, a notice of the draft Title V Operating Permit will be published on the DAQ website to provide for a 30-day comment period with an opportunity for a public hearing. Copies of the draft (proposed) permit, review and public notice will be sent to EPA for their 45-day review, to persons on the Title V mailing list, to the Winston-Salem Regional Office, and to the Permittee.

## 8. Other Requirements

### PE Seal

A PE seal is not required since there are no air pollution capture or control systems being added in accordance with 02Q .0112.

### Zoning

A consistency determination was received for the Part I application on July 27, 2022, dated July 21, 2022, from Lynn Cochran, Senior Planner with Rockingham County stating they received a copy of the air permit application and the proposed operation is consistent with applicable zoning ordinances.

### Compliance Status

The last inspection report by Dylan Wright on April 19, 2024, shows an "informal NOV" which was rescinded. The Company provided evidence that their 2017 ACC was submitted by the due date, but to an inaccurate address. WSRO rescinded the NOV on 7/19/2018.

Compliance History. This facility has not been issued a NOV, NOV, or NOV/NRE in the last five years. Conclusion of inspection is based on review of records and visual observations, this facility appeared to be operating in compliance with Air Quality rules and regulations at the time of this inspection. Although, the current permit states that the new turbines are required to operate a CEMS when the units are operating. This condition does not reflect the regulation properly, thus the need for the permit to reopen for cause to prevent future compliance issues (this is being corrected with this Part II/Reopen for Cause application).

## 9. Comments on Draft Permit

The draft permit was sent to the Stationary Source Compliance Branch, Applicant and Winston-Salem Regional Office on September 23, 2024.

### Transco Comments (email to Ed Martin from Michael Callegari dated October 2, 2024)

One typo edit and request for consideration in the draft condition associated with existing ID No. ES-M/L16 below. 365 days would allow for sequencing of performance testing at other stations in the area to avoid multiple testing contractor mobilizations at compressor stations within the area. (Note, this is in reference to permit condition 2.1 A.2.e).

*"e. Under the provisions of NCGS 143-215.108, the Permittee shall demonstrate compliance with the emission limit in Section 2.1 A.2.b above on an annual basis by conducting performance testing on combustion turbine (ID No. ES-M/L16) in accordance with a testing protocol approved by the DAQ. Test methods and procedures shall be conducted as specified in 40 CFR 60.335 as applicable. The initial test shall be conducted within ~~180 days~~ 365 days of the issuance of this Title V permit 09113T17 or another date as approved by DAQ. Each ~~subsequent~~ subsequent test shall be conducted within 13 months of the previous stack test. If the results of this test are less than 90 percent of the emission limit in Section 2.1 A.2.b above, the Permittee shall*

*be required to stack test within 61 months of the previous stack test. If these testing requirements are not met, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0524.”*

Response

This was discussed among Ed Martin, Joe Volker, Rahul Thaker, and Mark Cuilla. Since the 180 days requirement above is our standard condition language, this change cannot be made.

SSCB Comments

No comments were received.

WSRO Comments (in marked up permit from Thomas Gray dated October 7, 2024)

See below.

Response

The following changes were made to the permit for comments received:

- |                     |  |
|---------------------|--|
| Section 2.1 A.2.e   | Add to include submittal of reports for initial and subsequent test reports.   |
| Section 2.1 A.2.j   | Add to include report within 180 days of the issuance of this Title V permit 09113T17 and within 60 days after each subsequent performance test. |
| Section 2.1 B.2.d   | Add to include submittal of report for initial performance test.   |
| Section 2.1 B.2.m   | Revised to submit a written report for the initial performance test not later than 180 days after initial startup.                               |
| Section 2.1 B.2.o.i | Added that the excess emissions and downtime report applies if the Permittee elects to use NOx CEMS.   |

Comments as result of 30-day public notice

No comments were received.

Comments as a result of EPA 45 day comment period

No comments were received.

## **10. Recommendations**

The permit application for the facility 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.

No comments were received as a result of public notice and EPA review procedures.

DAQ recommends the issuance of Air Permit No. 09113/T17.

## ATTACHMENT A

Review for Application Number: 7900131.22A

Resulting in the Issuance of Permit Number: 09113/T15

## ATTACHMENT B

Review for Application Number: 7900131.23A

Resulting in the Issuance of Permit Number: 09113/T16