



Tennessee Gas Pipeline
Company, L.L.C.
a Kinder Morgan company

AIR PERMIT RENEWAL APPLICATION

Tennessee Gas Pipeline Company, LLC
Compressor Station 96
Campbellsville, KY

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TABLE OF CONTENTS

1. APPLICATION SUMMARY	1-1
1.1 Purpose of Application	1-1
1.2 Summary of Application Contents	1-1
2. FACILITY AND OPERATIONS DESCRIPTION	2-1
2.1 Facility Location	2-1
2.2 Facility Summary of Operations	2-1
2.3 Air Permit History Summary.....	2-1
3. APPLICABLE REQUIREMENTS SUMMARY	3-1
3.1 Source Classification	3-1
3.1.1 Prevention of Significant Deterioration	3-1
3.1.2 Title V Permitting Program	3-1
3.1.3 Hazardous Air Pollutants.....	3-2
3.2 Regulatory Analysis	3-2
3.2.1 40 CFR Part 60 – New Source Performance Standards	3-2
3.2.2 40 CFR Part 63 – National Emissions Standards for Hazardous Air Pollutants.....	3-5
3.2.3 Kentucky State Implementation Plan Regulations.....	3-7
APPENDIX A. FACILITY AERIAL MAP AND PFD	A-1
APPENDIX B. DEP7007 APPLICATION FORMS	B-1
APPENDIX C. REQUESTED CHANGES TO EXISTING PERMIT	C-1

1. APPLICATION SUMMARY

1.1 Purpose of Application

Tennessee Gas Pipeline Company, LLC (TGP) owns and operates a natural gas transmission station in Campbellsville, Taylor County, Kentucky (identified herein as Station 96). This natural gas transmission facility is classified as a Title V major source under the Title V operating permit program and currently operates in accordance with permit V-20-024, issued by Kentucky Division for Air Quality (KDAQ) on September 12, 2021. As the permit expires on September 12, 2026, a renewal application for the permit must be submitted at least six months prior to the permit expiration date, or by March 12, 2026. This document and its appendices constitute the renewal application for Station 96, as required under Condition G.2.a. of the existing permit and 401 KAR 52:020, Section 12.

1.2 Summary of Application Contents

Following this introduction, Section 2 presents summary information about Station 96 including its location and a brief description of operations. Section 3 provides an analysis of applicable regulatory requirements under state and federal air quality programs with a focus on the regulatory implications of any updates made to applicable regulations since the initial Title V permit V-20-024 was issued.

Appendix A presents an aerial map that shows the location of Station 96 relative to nearby geographic features, as well as a simplified process flow diagram (PFD) representing the facility's primary gas transmission operation. Appendix B provides the required DEP7007AI form. Appendix C includes red-line strike-out (RLSO) mark-ups of select pages of the current permit, which identify TGP's requested permit changes. TGP has not installed, shutdown, or modified any emissions-generating equipment since the issuance of the current permit, and no underlying emissions calculation methodologies have been revised during the permit term. As such, the current facility-wide potential-to-emit (PTE) is equal to the PTE provided in the most recent source-wide permit application, and detailed emission unit-specific PTE calculations are not included with this application.

Pursuant to 401 KAR 52:020, Section 4(2)(c), applications for permit renewals shall provide only information that is new or different from the most recent source-wide permit application. As such, the application forms included in Appendix B are limited to the 7007AI form required to be submitted with all permit renewal applications. Other application forms addressing specific emission unit categories (e.g., 7007EE form for internal combustion engines), insignificant activities (IA) information on the 7007DD form, and the emissions, stacks, and controls information on the 7007N form have previously been provided to KDAQ and would not provide any new or different information from the most recent source-wide application.

2. FACILITY AND OPERATIONS DESCRIPTION

2.1 Facility Location

Station 96 is located in Taylor County approximately 6 miles northwest of Campbellsville, KY. The property encompasses an area of approximately 150 acres and is bordered by a rural community. The approximate Universal Transverse Mercator (UTM) coordinates for the center of the facility are 641.9 km East and 4,142.1 km North in Zone 16. Figure A-1 provides an aerial view of the main site operations.

2.2 Facility Summary of Operations

Station 96 is a natural gas transmission facility that increases natural gas transmission pressures by compressing low-pressure transmission gas and directing it into a high-pressure transmission line. This primary operation at Station 96 is conducted by 19 natural gas-fired, reciprocating internal combustion engines (RICE) that each power one compressor (E01-E19). Each compressor engine was installed and commenced operation between 1948 and 1957. E01-E05 are each rated for 1,100 horsepower (hp). E06-E19 are each rated for 1,350 hp. The facility also operates two (2) electric driven compressors, each rated at 8,400 hp. Additionally, the facility's operations are supported by an emergency-use generator powered by a 1,025-hp natural gas-fired RICE (E20), which was installed in 2000.

Station 96 also has three process heaters: two jacket water heaters (E21 and E22) and one wastewater evaporator (E23). E21 is rated at 4.5 million British thermal units per hour (MMBtu/hr) and was constructed in 1984. E22 is rated at 7.5 MMBtu/hr and was constructed in 2000. E23 is rated for 0.395 MMBtu/hr and was constructed in 2002.

Various storage tanks containing lube oils, used oils, diesel, gasoline, natural gas pipeline condensate, compressor oil rundown, and compressor jacket water rundown are located on-site and permitted as IAs. Small natural gas-fired heaters less than 1 MMBtu/hr each and fugitive emissions from pipeline components are also permitted as IAs in Section C.

2.3 Air Permit History Summary

The current air permit for Station 96 was originally issued on September 12, 2021. No permit actions have been submitted since the issuance of V-20-024.

3. APPLICABLE REQUIREMENTS SUMMARY

Section 3.1 provides general air quality regulatory information for Station 96, including the facility's status with respect to the Prevention of Significant Deterioration (PSD) and Title V permitting programs. This section also discusses the facility's status as a major source of hazardous air pollutants (HAP). In accordance with the regulatory requirements for a permit renewal application established by 401 KAR 52:020, Section 4(2)(c), Sections 3.2 and 3.3 of this application focus on describing potential newly applicable or modified requirements that could impact Station 96 since the issuance of the current permit on September 12, 2021.

3.1 Source Classification

3.1.1 Prevention of Significant Deterioration

Station 96 is in Taylor County, which has been designated by EPA as unclassified/attainment for all criteria pollutants. Therefore, with respect to the federal New Source Review (NSR) permitting program, only PSD requirements could potentially apply to the source.

Kentucky has incorporated the requirements of the PSD permitting program into its State Implementation Plan (SIP) at 401 KAR 51:017. These PSD regulations specifically define 28 industrial source categories for which the major stationary source threshold of any regulated NSR pollutant is 100 tons per year (tpy). For all unlisted sources, the major stationary source threshold of any regulated NSR pollutant is 250 tpy. As a natural gas transmission facility, Station 96 is not included under one of these 28 industrial source categories. Thus, the major stationary source threshold under the PSD program for a regulated NSR pollutant emitted from Station 96 is 250 tpy. Since the potential emissions of carbon monoxide (CO) and nitrogen oxides (NO_x) are greater than 250 tpy, Station 96 is classified as a major stationary source.

This renewal application submittal is not associated with a construction project or a facility modification that involves PSD applicability considerations. Accordingly, Station 96 will continue to be a major source for CO and NO_x and a true minor source for all other regulated NSR pollutants under the PSD program.

3.1.2 Title V Permitting Program

40 CFR Part 70 contains the regulations implementing the federal Title V operating permit program. Kentucky has incorporated the provisions of this federal program in its Title V operating permit program at 401 KAR 52:020. As specified in 401 KAR 52:001, Section 1(46), a major source with respect to the Title V regulations encompasses facilities with potential emissions of 100 tpy of any regulated pollutant, 10 tpy of any single HAP, and/or 25 tpy of any combination of HAP. The potential emissions of CO, NO_x, volatile organic compounds (VOC), single HAP (formaldehyde), and combined HAP from Station 96 exceed the corresponding major source thresholds; as such, Station 96 is classified as a major source under Kentucky's Title V operating permit program and is subject to 401 KAR 52:020.

As noted in the PSD applicability discussion above, this renewal application submittal is not associated with a construction project or facility modification which could change the facility-wide PTE. Station 96 will continue to operate as a major source subject to 401 KAR 52:020 upon permit renewal.

3.1.3 Hazardous Air Pollutants

A major source of HAP is a source with potential emissions in excess of 25 tpy for total combined HAP and/or potential emissions in excess of 10 tpy for any individual HAP. The potential emissions of an individual HAP (i.e., formaldehyde) and those of all combined HAP from Station 96 exceed the corresponding major source thresholds; therefore, Station 96 is classified as a major source of HAP. Station 96 is not requesting a revision to any HAP emission calculation methodologies with this permit renewal, and will continue to operate as a major source of HAP upon permit renewal.

3.2 Regulatory Analysis

There were no permit actions submitted since the last renewal of Station 96's permit. The following subsections provide high-level analyses of various applicable or potentially applicable federal and state regulations.

3.2.1 40 CFR Part 60 – New Source Performance Standards

New Source Performance Standards (NSPS) regulations require new, modified, or reconstructed sources to control emissions to the level achievable by the best demonstrated technology as specified in the applicable provisions. The following subsections assess the applicability of various NSPS.

3.2.1.1 40 CFR 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

40 CFR 60, Subpart JJJJ (NSPS JJJJ) applies to owners and operators of stationary spark ignition (SI) internal combustion engines (ICE) that commence construction, modification, or reconstruction after June 12, 2006. All stationary SI ICE at Station 96 commenced construction prior to June 12, 2006 and have not been modified or reconstructed during the permit term. As such, NSPS JJJJ is not applicable to Station 96.

3.2.1.2 40 CFR 60, Subpart OOOO – Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification, or Reconstruction Commenced After August 23, 2011, and on or Before September 18, 2015

40 CFR 60, Subpart OOOO (NSPS OOOO) regulates VOC emissions from specific sources within the oil and natural gas industry that commenced construction, modification, or reconstruction after August 23, 2011, and on or before September 18, 2015, and which include the following affected facilities listed in 40 CFR 60.5365(a) through (g):

- a) Each natural gas well affected facility;
- b) Each centrifugal compressor affected facility;
- c) Each reciprocating compressor affected facility;
- d) Each continuous bleed natural gas-driven pneumatic controller affected facility;
- e) Each storage vessel affected facility with a VOC PTE greater than or equal to six tpy;
- f) Each group of equipment (pump, pressure relief device, open-ended valve or line, valve, and flange or other connector in VOC service or wet gas service) within a process unit except compressors; and
- g) Sweetening units located at onshore natural gas processing plants.

Station 96 does not operate a natural gas well, process unit, or sweetening unit as these terms are defined in 40 CFR 60.5430. Therefore, 40 CFR 60.5365(a), (f), and (g) do not apply to the operations at Station 96.

As defined in 40 CFR 60.5365(b) and (c), each centrifugal/reciprocating compressor affected facility includes only those compressors located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment. 40 CFR 60.5430 defines a "wellhead" as *"the piping, casing, tubing and connected valves protruding above the earth's surface for an oil and/or natural gas well. The wellhead ends where the flow line connects to a wellhead valve. The wellhead does not include other equipment at the well site except for any conveyance through which gas is vented to the atmosphere."* The compressors driven by the natural gas-fired RICE (E01-E19) are not located between a wellhead and point of custody transfer to the natural gas transmission and storage segment. Therefore, 40 CFR 60.5365(b) and (c) do not apply to the operations at Station 96.

As defined in 40 CFR 60.5365(d)(1) through (3), only those pneumatic controllers located within the oil production segment, natural gas production segment, and natural gas processing plants are affected facilities. As a natural gas transmission facility, Station 96 is not a part of an oil production segment, natural gas production segment, or natural gas processing plant. Therefore, 40 CFR 60.5365(d)(1) through (3) do not apply to the operations at Station 96.

As defined in 40 CFR 60.5365(e), storage vessels located in the oil and natural gas production segment, natural gas processing segment, or natural gas transmission and storage segment, and which have the potential for VOC emissions equal to or greater than six tpy are affected facilities. 40 CFR 60.5430 defines a "storage vessel" as *"a tank or other vessel that contains an accumulation of crude oil, condensate, intermediate hydrocarbon liquids, or produced water."* The Pipeline Drip Oil tanks (IA8 and IA15), permitted in Section C of V-20-024 as IAs, meet the definition of a "storage vessel" as they are designed to store natural gas pipeline condensate. However, both tanks were constructed prior to the NSPS OOOO applicability date of August 23, 2011, and have not been reconstructed or modified since that date. As such, Station 96 does not operate a storage vessel affected facility and 40 CFR 60.5365(e) does not apply.

Based on the regulatory analysis provided above – and considering no affected facilities were constructed, reconstructed, or modified between August 23, 2011, and September 18, 2015 – NSPS OOOO is not applicable and will continue to be inapplicable to Station 96 upon permit renewal.

3.2.1.3 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

40 CFR 60, Subpart OOOOa (NSPS OOOOa) applies to affected facilities that commenced construction, reconstruction, or modification after September 18, 2015, and before December 6, 2022. The specific sources covered by NSPS OOOOa include the following:

- a) Each well affected facility, which is a single well that conducts a well completion operation following hydraulic fracturing or refracturing;
- b) Each centrifugal compressor affected facility;
- c) Each reciprocating compressor affected facility;
- d) Each pneumatic controller affected facility;
- e) Each storage vessel affected facility with VOC PTE greater than or equal to 6 tpy;
- f) Each group of equipment within a process unit at an onshore natural gas processing plant;
- g) Sweetening units located at an onshore natural gas processing plants;
- h) Each pneumatic pump affected facility;
- i) All fugitive emissions components at a well site; and
- j) All fugitive emissions at a compressor station.

Station 96 does not operate a natural gas well, centrifugal compressor, process unit, or sweetening unit as these terms are defined in 40 CFR 60.5430a. Therefore, 40 CFR 60.5365a(a), (b), (f), (g), and (i) do not apply to the operations at Station 96. Additionally, only pneumatic pumps located at natural gas processing plants or well sites are affected facilities under NSPS OOOOa. As such, 40 CFR 60.5365a(h) does not apply to the operations at Station 96.

Pursuant to 40 CFR 60.5365a(d)(1), a pneumatic controller not located at a natural gas processing plant is an affected facility if it is designed as a continuous bleed natural gas-driven device operating at a natural gas bleed rate greater than 6 standard cubic feet per hour (scfh). Station 96 does not operate any continuous bleed natural gas-driven pneumatic controllers; therefore, 40 CFR 60.5365a(d) does not apply to Station 96.

Pursuant to 40 CFR 60.5365a(c), a reciprocating compressor at a compressor station is an affected facility under NSPS OOOOa. Additionally, pursuant to 40 CFR 60.5365a(j), the collection of fugitive emissions components at a compressor station is an affected facility. TGP does operate reciprocating compressors and a collection of fugitive emissions components at Station 96 which are potentially subject to NSPS OOOOa. For the purposes of determining applicability of the fugitive emissions standards under 40 CFR 60.5397a, a "modification" to a compressor station occurs only when either 1) an additional compressor is installed, or 2) one or more compressors are replaced by one or more compressors of greater total horsepower. TGP did not apply for any reciprocating compressor replacements or new reciprocating compressor installations during the permit term. As such, there have been no modifications to the fugitive emissions at the compressor station and the fugitive emissions at Station 96 permitted under IA23 are not an affected facility under NSPS OOOOa. There were no projects at Station 96 which involved the construction, reconstruction, or modification of potentially subject equipment during the permit term. Therefore, 40 CFR 60.5365a(c) and (j) do not apply to Station 96 and will remain inapplicable upon permit renewal.

Pursuant to 40 CFR 60.5430a, and similarly to the definition under NSPS OOOO, a "storage vessel" under NSPS OOOOa is defined as "*a tank or other vessel that contains an accumulation of crude oil, condensate, intermediate hydrocarbon liquids, or produced water.*" As discussed under the regulatory applicability analysis for NSPS OOOO, Station 96 operates two Pipeline Drip Oil Tanks that meet the definition of "storage vessel" as they are designed to store natural gas pipeline condensate. However, both tanks were constructed prior to the NSPS OOOOa applicability date of September 18, 2015, and have not been reconstructed or modified since that date. As such, Station 96 does not operate a storage vessel affected facility and 40 CFR 60.5365a(e) does not apply.

Based on the regulatory analysis provided above – and considering no affected facilities were constructed, reconstructed, or modified between September 18, 2015, and December 6, 2022 – NSPS OOOOa is not applicable and will continue to be inapplicable to Station 96 upon permit renewal.

3.2.1.4 40 CFR 60, Subpart OOOOb – Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification, or Reconstruction Commenced After December 6, 2022

40 CFR 60, Subpart OOOOb (NSPS OOOOb) applies to affected facilities that commenced construction, reconstruction, or modification after December 6, 2022. The specific sources covered by NSPS OOOOb include the following:

- a) Each well affected facility, which is a single well drilled for the purpose of producing oil or natural gas;
- b) Each centrifugal compressor affected facility;
- c) Each reciprocating compressor affected facility;

- d) Each process controller affected facility;
- e) Each storage vessel affected facility with VOC PTE greater than or equal to 6 tpy or methane PTE greater than or equal to 20 tpy;
- f) Each group of equipment within a process unit at an onshore natural gas processing plant;
- g) Each sweetening unit affected facility;
- h) Each pump affected facility; and
- i) All fugitive emissions components at a well site, centralized production facility, or a compressor station.

Station 96 meets the definition of a “compressor station” under NSPS OOOOb and is potentially subject to this regulation. However, no potentially subject equipment at Station 96 has been constructed, modified, or reconstructed since at least December 6, 2022. As such, NSPS OOOOb is not applicable to Station 96 and will remain inapplicable upon permit renewal.

3.2.1.5 40 CFR 60, Subpart OOOOc – Emissions Guidelines for Greenhouse Gas Emissions from Existing Crude Oil and Natural Gas Facilities

40 CFR 60, Subpart OOOOc (NSPS OOOOc) establishes emissions guidelines and compliance schedules to be included in a state plan developed by all air pollution control agencies in the United States with one or more designated facilities that commenced construction, modification, or reconstruction on or before December 6, 2022. Presumptive standards that could be applicable to Station 96 are included in 40 CFR 60.5385c through 60.5430c as part of the “model rule” of NSPS OOOOc. Under the “model rule,” the specific sources covered by NSPS OOOOc as “designated facilities” include the following:

- a) Each well designated facility, which is a single well drilled for the purpose of producing oil or natural gas;
- b) Each centrifugal compressor designated facility;
- c) Each reciprocating compressor designated facility;
- d) Each process controller designated facility;
- e) Each storage vessel designated facility, which is a tank battery that has the potential for methane emissions equal to or greater than 20 tpy;
- f) Each group of equipment within a process unit at an onshore natural gas processing plant;
- g) Each pump designated facility; and
- h) All fugitive emissions components at a well site, centralized production facility, or a compressor station.

All potentially subject designated facilities at Station 96 commenced construction, modification, or reconstruction prior to December 6, 2022. Pursuant to the presumptive standard under the model rule at 40 CFR 60.5387c and Table 1 to NSPS OOOOc, any owner or operator of a designated facility must comply with the presumptive standards of the model rule within 36 months after the state plan submittal deadline of January 22, 2027.

Station 96 will comply with the provisions of the NSPS OOOOc state plan within 36 months of its submittal deadline as required by 40 CFR 60.5387c and Table 1 to NSPS OOOOc. Once NSPS OOOOc has been incorporated into a final SIP, TGP will provide an updated 7007V form outlining the applicable requirements from NSPS OOOOc.

3.2.2 40 CFR Part 63 – National Emissions Standards for Hazardous Air Pollutants

The National Emissions Standards for Hazardous Air Pollutants (NESHAP) regulations established in 40 CFR Part 61 and Part 63 regulate the emissions of HAP. The NESHAP regulations under 40 CFR Part 61 establish

emissions standards on a pollutant basis, whereas those under 40 CFR Part 63 establish standards on a source category basis. The following subsections assess the applicability of various NESHAP.

3.2.2.1 40 CFR 63, Subpart HH – National Emissions Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities

40 CFR 63, Subpart HH – National Emissions Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities (NESHAP HH) applies to owners and operators of emission points located at oil and natural gas production facilities. Only such facilities that meet the following criteria are subject to this regulation:

1. Facilities that are major or area sources of HAP; and
2. Facilities that process, upgrade, or store hydrocarbon liquids prior to the point of custody transfer; or
3. Facilities that process, upgrade, or store natural gas prior to the point at which natural gas enters the natural gas transmission and storage source category or is delivered to a final end user.

Station 96 does not process, upgrade, or store hydrocarbon liquids prior to the point of custody transfer, nor does the compressor station process, upgrade, or store natural gas. Therefore, NESHAP HH does not apply to Station 96 and will remain inapplicable upon permit renewal.

3.2.2.2 40 CFR 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)

40 CFR 63, Subpart ZZZZ (RICE NESHAP) applies to any existing, new, or reconstructed stationary RICE at major or area sources of HAP emissions, excluding stationary RICE tested at a stationary RICE test cell/stand. Pursuant to 40 CFR 63.6590(a)(2)(i), for stationary RICE located at a major source, a stationary RICE with a site rating of more than 500 brake hp is "new" if construction of the stationary RICE commenced on or after December 19, 2002. As stated previously, Station 96 commenced construction on E01-E19 prior to 2002; therefore, none of these engines meet the definition of a new stationary RICE under RICE NESHAP. Pursuant to 40 CFR 63.6590(a)(3)(i), a stationary RICE with a site rating of more than 500 brake hp at a major source is "reconstructed" if it meets the definition of a reconstructed source under 40 CFR 63.2 and reconstruction commenced on or after December 19, 2002. None of the compressor engines permitted under E01-E19 have been reconstructed as defined by 40 CFR 63.2 since December 19, 2002; therefore, none of these engines meet the definition of a reconstructed stationary RICE under RICE NESHAP. All compressor engines at Station 96 therefore are considered existing stationary RICE under RICE NESHAP.

Pursuant to 40 CFR 63.6590(b)(3)(i), an existing spark ignition 2 stroke lean burn stationary RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions is not required to meet the requirements of RICE NESHAP or of 40 CFR 60, Subpart A, including initial notification. E01-E19 all meet this category of subject RICE; therefore, as reflected in V-20-024, E01-E19 are not required to meet the requirements of RICE NESHAP.

E20 was also constructed prior to December 19, 2002, and has not been reconstructed since this date; therefore, it is considered existing under RICE NESHAP. Pursuant to 40 CFR 63.6590(b)(3)(iii), an existing emergency stationary RICE with a site rating of more than 500 brake hp located at a major source of HAP emissions is not required to meet the requirements of RICE NESHAP or 40 CFR 60, Subpart A, including initial notification. However, the emergency engine must meet the operational requirements for emergency engines at 40 CFR 63.6640(f).

3.2.2.3 40 CFR 63, Subpart DDDDD – NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

40 CFR 63, Subpart DDDDD (Boiler MACT) applies to industrial, commercial, or institutional boilers or process heaters, as defined in 40 CFR 63.7575, that are located at, or are part of, a major source of HAP, except as specified in 40 CFR 63.7491. Boiler MACT applies to each new, reconstructed, or existing affected source, where the affected source includes the collection of all existing industrial, commercial, and institutional boilers and process heaters within an applicable subcategory defined in 40 CFR 63.7575 and each new or reconstructed industrial, commercial, or institutional boiler or process heater.

Station 96 is a major source of HAP emissions and includes two (2) Jacket Water Heaters (E21 and E22) and a Wastewater Evaporator (E23) that each meet the definition of a “process heater” under this rule. E22 is subject to biennial tune ups, and E21 and E23 are subject to a tune up every 5 years. All heaters are also subject to recordkeeping and reporting requirements of Boiler MACT.

3.2.3 Kentucky State Implementation Plan Regulations

The following subsections discuss the applicability of relevant Kentucky SIP regulations.

3.2.3.1 401 KAR 51:150 – NO_x Requirements for Stationary Internal Combustion Engines

401 KAR 51:150 provides for the regional control of NO_x emissions by establishing requirements for large stationary internal combustion engines pursuant to the federal NO_x SIP Call. TGP operates “Large NO_x SIP Call Engines” as defined by 401 KAR 51:150 Section 1(3); however, none of the Large NO_x SIP Call Engines are located at Station 96. TGP developed a compliance plan as required by this rule in February 2006. Through this plan, TGP proposed NO_x emissions reductions by shifting historic load capacity at Station 96 from 13 natural gas-fired engines to two electric motors. TGP continues to comply with 401 KAR 51:150 through the applicable recordkeeping requirements outlined in the February 2006 compliance plan.

3.2.3.2 401 KAR 59:015 – New Indirect Heat Exchangers.

This regulation applies to equipment, apparatus, or contrivances used for the combustion of fuel in which the energy produced is transferred to its point of usage through a medium that does not come into contact with or add to the products of combustion. Affected sources must have a heat input capacity greater than 1 MMBtu/hr.

The two Jacket Water Heaters (E21 and E22) meet the definition of an affected facility under 401 KAR 59:015. Section 4 of 401 KAR 59:015 establishes opacity standards and heat input-based particulate matter (PM) emission limits. Pursuant to 401 KAR 59:015, Section 4(2), for a source with total heat input capacity of less than 250 MMBtu/hr for all affected facilities at the source, opacity of continuous emissions from E21 and E22 are limited to 20%, except that a maximum of 40% shall be allowed for a maximum of six (6) consecutive minutes in any sixty (60) minute period during fire-box cleaning or soot blowing events.

The applicable PM emission limits for E21 and E22 are determined based on the total heat input capacity for all the affected facilities at the source at the time of construction of the new units. A different heat input-based PM allowable emission rate applies depending on whether the total heat input capacity for the facility is less than 10 MMBtu/hr, between 10 MMBtu/hr and 250 MMBtu/hr, or above 250 MMBtu/hr. Under the applicable equations in Section 4(1), the applicable PM limit for E21 is 0.56 lb PM/MMBtu, and that for E22 is 0.54 lb PM/MMBtu.

Section 5 of this rule establishes sulfur dioxide (SO₂) emissions standards. The SO₂ emissions standard is also determined based on the total heat input capacity for all affected facilities at the source. A different heat input capacity-based allowable emission rate algorithm applies based on the type of fuel to be burned (e.g., solid, liquid, or gaseous) and whether the total, facility-wide affected facility heat input capacity falls within one of the same ranges discussed above for the PM emission limit derivation. Under the applicable equations in Section 5(1), the applicable SO₂ limit for E21 is 3.0 lb SO₂/MMBtu, and that for E22 is 2.78 lb SO₂/MMBtu.

The Jacket Water Heaters are fired exclusively with pipeline quality natural gas and, therefore, meet the standards of this rule.

3.2.3.3 401 KAR 59:050 – New Storage Vessels for Petroleum Liquids

An affected facility under 401 KAR 59:050 includes any storage vessel for petroleum liquids which commenced operation on or after April 9, 1972 and prior to July 24, 1984, has a storage capacity greater than 580 gallons and less than 40,000 gallons, and is located in either an urban county designated non-attainment for ozone under 401 KAR 51:010 or in any other county and is part of a major source of VOC; or any such storage vessel located in the same areas which commenced construction after July 24, 1984, and has a storage capacity greater than 580 gallons and less than 10,567 gallons.

The Gasoline Tank (IA6) and Pipeline Drip Oil Tanks (IA8 and IA15) each meet the definition of an affected facility under this rule, have storage capacities less than 10,567 gallons, and commenced construction after April 9, 1972. Although Taylor County is not designated as non-attainment for ozone under 401 KAR 51:010, Station 96 is a major source of VOC. Therefore, this regulation is applicable to the Gasoline Tank and Pipeline Drip Oil Tanks. Pursuant to Section 3(2), if storing petroleum liquids with a true vapor pressure equal or greater than 1.5 psia, the vessel must at a minimum be equipped with a permanent submerged fill pipe. All three tanks are equipped with a permanent submerged fill pipe and are therefore in compliance with this regulation.

3.2.3.4 401 KAR 63:020 – Potentially Hazardous Matter or Toxic Substances

Kentucky regulates the emissions of toxic air pollutants through 401 KAR 63:020. KDAQ can require that dispersion modeling or other analyses be completed by facilities at permit renewal or when constructing equipment when there is an increase in toxic pollutant emissions, as defined under 401 KAR 63:020, Section 2(2), deemed to be "significant." This is done so that there is a documented basis for affirming that a facility does not cause an adverse impact on the health and welfare of humans, animals, and plants.

Station 96 is compliant with 401 KAR 63:020 through compliance with the conditions of V-20-024 as determined by KDAQ through a SCREEN View model performed on September 22, 2020, of potentially hazardous matter or toxic substances (hexane and benzene). Since there have been no projects which modified existing equipment in any way that would increase the potential emissions of air toxics or installed any new equipment that are sources of air toxics since the most recent source-wide permit application, TGP does not anticipate that any additional air dispersion modeling will need to be performed in conjunction with this permit renewal application.

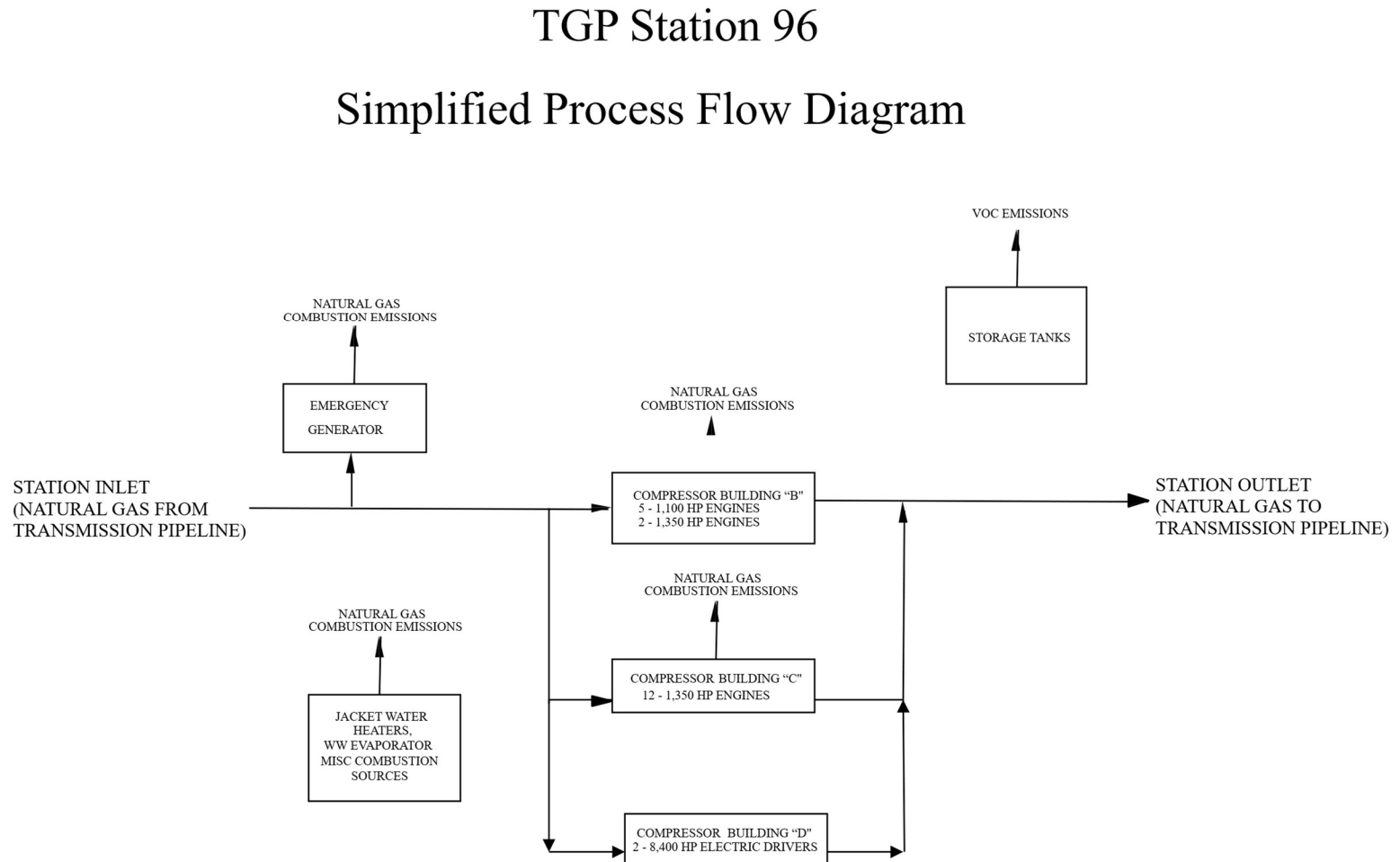
APPENDIX A. FACILITY AERIAL MAP AND PFD

- ▶ Figure A-1: Aerial Map of Station 96
- ▶ Figure A-2: Station 96 PFD

Figure A-1: Aerial Map of Station 96 and Surrounding Area



Figure A-2: Station 96 Process Flow Diagram



APPENDIX B. DEP7007 APPLICATION FORMS

► **7007AI** – Administrative Information

Division for Air Quality 300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999	DEP7007AI Administrative Information ___ Section AI.1: Source Information ___ Section AI.2: Applicant Information ___ Section AI.3: Owner Information ___ Section AI.4: Type of Application ___ Section AI.5: Other Required Information ___ Section AI.6: Signature Block ___ Section AI.7: Notes, Comments, and Explanations	Additional Documentation None ___ Additional Documentation attached
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Source Name: Tennessee Gas Pipeline Company, L.L.C. - Station 96

KY EIS (AFS) #: 21- 217-00033

Permit #: V-20-024

Agency Interest (AI) ID: 44056

Date: 3/9/2026

Section AI.1: Source Information			
Physical Location	Street:	<u>1380 Hobson Road</u>	
Address:	City:	County:	Zip Code:
	<u>Campbellsville</u>	<u>Taylor</u>	<u>42718</u>
Mailing Address:	Street or P.O. Box:	<u>1380 Hobson Road</u>	
	City:	State:	Zip Code:
	<u>Campbellsville</u>	<u>Taylor</u>	<u>42718</u>

Standard Coordinates for Source Physical Location	
Longitude: <u>-85.3925</u> (decimal degrees)	Latitude: <u>37.413333</u> (decimal degrees)

Primary (NAICS) Category: <u>Pipeline Transportation of Natural Gas</u>	Primary NAICS #: <u>486210</u>
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Classification (SIC) Category:				<u>Natural Gas Transmission</u>		Primary SIC #: <u>4922</u>	
Briefly discuss the type of business conducted at this site:		<u>Station 96 boosts natural gas transmission pressures by compressing low-pressure transmission gas and directing it into a high-pressure transmission line.</u>					
Description of Area Surrounding Source:	☒ Rural Area	☐ Industrial Park	☐ Residential Area	Is any part of the source located on federal land?	☐ Yes	Number of Employees:	<u>~16</u>
	☐ Urban Area	☐ Industrial Area	☐ Commercial Area		☒ No		
Approximate distance to nearest residence or commercial property:		<u>~75 feet</u>		Property Area:	<u>~150 acres</u>		
Is this source portable? ☐ Yes ☒ No							
What other environmental permits or registrations does this source currently hold or need to obtain in Kentucky?							
NPDES/KPDES:		☐ Currently Hold	☐ Need	☒ N/A			
Solid Waste:		☐ Currently Hold	☐ Need	☒ N/A			
RCRA:		☐ Currently Hold	☐ Need	☒ N/A			
UST:		☐ Currently Hold	☐ Need	☒ N/A			
Type of Regulated Waste Activity:		☐ Mixed Waste Generator	☐ Generator	☐ Recycler	☐ Other: _____		
		☐ U.S. Importer of Hazardous Waste	☐ Transporter	☐ Treatment/Storage/Disposal Facility	☒ N/A		

Section AI.2: Applicant Information

Applicant Name:	Tennessee Gas Pipeline Company, L.L.C.		
Title: (if individual)			
Mailing Address:	Street or P.O. Box:	1001 Louisiana St., Suite 1000	
	City:	State:	Zip Code:
	Houston	TX	77002
Email: (if individual)			
Phone:			

Technical Contact

Name:	Paul Witkowski		
Title:	Environmental Engineer		
Mailing Address:	Street or P.O. Box:	1001 Louisiana St., Suite 1000	
	City:	State:	Zip Code:
	Houston	TX	77002
Email:	Paul_Witkowski@kindermorgan.com		
Phone:	(713) 420-2045		

Air Permit Contact for Source

Name:	Same as Technical Contact		
Title:			
Mailing Address:	Street or P.O. Box:		
	City:	State:	Zip Code:
Email:			
Phone:			

Section AI.3: Owner Information



Owner same as applicant

Name: _____

Title: _____

Mailing Address: **Street or P.O. Box:** _____
City: _____ **State:** _____ **Zip Code:** _____

Email: _____

Phone: _____

List names of owners and officers of the company who have an interest in the company of 5% or more.

Name

Position

Kinder Morgan Operating LLC "A"

Owner

Section AI.4: Type of Application

Current Status: ☒ Title V ☐ Conditional Major ☐ State-Origin ☐ General Permit ☐ Registration ☐ None

Requested Action:
(check all that apply)

☐ Name Change ☐ Initial Registration ☐ Significant Revision ☐ Administrative Permit Amendment

☒ Renewal Permit ☐ Revised Registration ☐ Minor Revision ☐ Initial Source-wide Operating Permit

☐ 502(b)(10)Change ☐ Extension Request ☐ Addition of New Facility ☐ Portable Plant Relocation Notice

☐ Revision ☐ Off Permit Change ☐ Landfill Alternate Compliance Submittal ☐ Modification of Existing Facilities

☐ Ownership Change ☐ Closure

Requested Status: ☒ Title V ☐ Conditional Major ☐ State-Origin ☐ PSD ☐ NSR ☐ Other: _____

Is the source requesting a limitation of potential emissions?

☐ Yes		☒ No	
Pollutant:	Requested Limit:	Pollutant:	Requested Limit:
☐ Particulate Matter	_____	☐ Single HAP	_____
☐ Volatile Organic Compounds (VOC)	_____	☐ Combined HAPs	_____
☐ Carbon Monoxide	_____	☐ Air Toxics (40 CFR 68, Subpart F)	_____
☐ Nitrogen Oxides	_____	☐ Carbon Dioxide	_____
☐ Sulfur Dioxide	_____	☐ Greenhouse Gases (GHG)	_____
☐ Lead	_____	☐ Other	_____

For New Construction:

Proposed Start Date of Construction:
(MM/YYYY)

N/A

Proposed Operation Start-Up Date: (MM/YYYY)

N/A

For Modifications:

Proposed Start Date of Modification:
(MM/YYYY)

N/A

Proposed Operation Start-Up Date: (MM/YYYY)

N/A

Applicant is seeking coverage under a permit shield.

☐ Yes

☒ No

Identify any non-applicable requirements for which permit shield is sought on a separate attachment to the application.

Section AI.5 Other Required Information

Indicate the documents attached as part of this application:

- | | |
|--|--|
| ☐ DEP7007A Indirect Heat Exchangers and Turbines | ☐ DEP7007CC Compliance Certification |
| ☐ DEP7007B Manufacturing or Processing Operations | ☐ DEP7007DD Insignificant Activities |
| ☐ DEP7007C Incinerators and Waste Burners | ☐ DEP7007EE Internal Combustion Engines |
| ☐ DEP7007F Episode Standby Plan | ☐ DEP7007FF Secondary Aluminum Processing |
| ☐ DEP7007J Volatile Liquid Storage | ☐ DEP7007GG Control Equipment |
| ☐ DEP7007K Surface Coating or Printing Operations | ☐ DEP7007HH Haul Roads |
| ☐ DEP7007L Mineral Processes | ☐ Confidentiality Claim |
| ☐ DEP7007M Metal Cleaning Degreasers | ☐ Ownership Change Form |
| ☐ DEP7007N Source Emissions Profile | ☐ Secretary of State Certificate |
| ☐ DEP7007P Perchloroethylene Dry Cleaning Systems | ☐ Flowcharts or diagrams depicting process |
| ☐ DEP7007R Emission Offset Credit | ☐ Digital Line Graphs (DLG) files of buildings, roads, etc. |
| ☐ DEP7007S Service Stations | ☐ Site Map |
| ☐ DEP7007T Metal Plating and Surface Treatment Operations | ☒ Map or drawing depicting location of facility |
| ☐ DEP7007V Applicable Requirements and Compliance Activities | ☐ Safety Data Sheet (SDS) |
| ☐ DEP7007Y Good Engineering Practice and Stack Height Determination | ☐ Emergency Response Plan |
| ☐ DEP7007AA Compliance Schedule for Non-complying Emission Units | ☒ Other: <u>Process Flow Diagram</u> |
| ☐ DEP7007BB Certified Progress Report | |

Section AI.6: Signature Block

I, the undersigned, hereby certify under penalty of law, that I am a responsible official*, and that I have personally examined, and am familiar with, the information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the information is on knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false or incomplete information, including the possibility of fine or imprisonment.


Authorized Signature

03/09/2026
Date

Joseph Simonsen
Type or Printed Name of Signatory

Director - Operations
Title of Signatory

*Responsible official as defined by 401 KAR 52:001.

Section AI.7: Notes, Comments, and Explanations
Kinder Morgan Operating LLC "A" owns 100% of Tennessee Gas Pipeline Company, L.L.C.

APPENDIX C. REQUESTED CHANGES TO EXISTING PERMIT

This appendix contains RLSO mark-ups of select pages of Permit V-20-024 which represent TGP's requested changes to the existing permit language.

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Emission Unit E20****4SLB Reciprocating Emergency Engine (96-C-Aux-01)****Description:**

Model: Caterpillar G3516TA
Primary Fuel: Natural Gas
Power Output: 1,025 hp
Max Operating Rate: 8.1 mmBtu/hr
Construction Date: 2000
Controls: None

APPLICABLE REGULATIONS:

401 KAR 63:002, Section 2(4)(eeee), 40 C.F.R. 63.6580 to 63.6675, Tables 1a to 8, and Appendix A (Subpart ZZZZ), National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

Note: D.C. Circuit Court [*Delaware v. EPA*, 785 F. 3d 1 (D.C. Cir. 2015)] has vacated the provisions in 40 CFR 63, Subpart ZZZZ and 40 CFR 60, Subpart IIII that contain the 100-hour exemption for operation of emergency engines for purposes of emergency demand response under 40 CFR 63.6640(f)(2)(ii)-(iii) and 40 CFR 60.4211(f)(2)(ii)-(iii). The D.C. Circuit Court issued the mandate for the vacatur on May 4, 2016.

1. Operating Limitations:

Pursuant to 40 CFR 63.6640(f), the permittee must operate the emergency stationary RICE according to the requirements in 40 CFR 63.6640(f)(1) through (4). In order for the engine to be considered an emergency stationary RICE under 40 CFR 63, Subpart ZZZZ, any operation other than emergency operation, maintenance and testing, ~~emergency demand response~~, and operation in non-emergency situations for 50 hours per year, as described in 40 CFR 63.6640(f)(1) through (4), is prohibited. If you do not operate the engine according to the requirements in 40 CFR 63.6640(f)(1) through (4), the engine will not be considered an emergency engine under 40 CFR 63, Subpart ZZZZ and must meet all requirements for non-emergency engines.

(1) There is no time limit on the use of emergency stationary RICE in emergency situations.

(2) The permittee may operate the emergency stationary RICE for ~~any combination of the purposes~~ specified in 40 CFR 63.6640(f)(2)(i) ~~through (iii)~~ for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by 40 CFR 63.6640(f)(3) counts as part of the 100 hours per calendar year allowed by 40 CFR 63.6640(f)(2).

- i. Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

- (3) Emergency stationary RICE located at major sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing ~~and emergency demand response~~ provided in 40 CFR 63.6640(f)(2). The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

Compliance Demonstration Method:

See 4. Specific Monitoring Requirements.

2. Emission Limitations:

None

3. Testing Requirements:

Pursuant to 401 KAR 50:045, Section 1, testing shall be conducted at such times as may be requested by the Cabinet.

4. Specific Monitoring Requirements:

Pursuant to 401 KAR 52:020, Section 10, the permittee shall monitor the hours of non-emergency operation for the emergency engine on a monthly basis.

5. Specific Recordkeeping Requirements:

Pursuant to 401 KAR 52:020, Section 10, the permittee shall keep records of the amount of fuel usage and the hours of non-emergency operation on a monthly basis for a twelve (12) month rolling total.

6. Specific Reporting Requirements:

See Section F, Monitoring, Recordkeeping, and Reporting Requirements.

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Emission Unit E21-E23 Process Heaters (3)****E21 [96-HEATER-01]****Description:**

Model: NATCO (Jacket Water Heater)
Primary Fuel: Natural Gas
Max Operating Rate: 4.5 mmBtu/hr
Construction Date: 1984
Controls: None

E22 [96-HEATER-02]**Description:**

Model: NATCO (Jacket Water Heater)
Primary Fuel: Natural Gas
Max Operating Rate: 7.5 mmBtu/hr
Construction Date: 2000
Controls: None

E23 [96-HEATER-20]**Description:**

Model: SAMSCO 600-316 (Waste Water Evaporator)
Primary Fuel: Natural Gas
Max Operating Rate: 0.395 mmBtu/hr
Construction Date: 2002
Controls: None

APPLICABLE REGULATIONS:

401 KAR 59:015, New Indirect Heat Exchangers. [96-HEATER-01 and 96-HEATER-02 only]

401 KAR 63:002, Section 2(4)(iiii), 40 C.F.R. 63.7480 to 63.7575, Tables 1 to ~~13~~15 (Subpart DDDDD), National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.

1. Operating Limitations:

- a. Pursuant to 40 CFR 63.7495(b), the permittee must comply with 40 CFR 63, Subpart DDDDD no later than January 31, 2016.
- b. Pursuant to 40 CFR 40 CFR 63.7500(e) and Table 3 of 40 CFR 63, Subpart DDDDD:
 - (1) Boilers and process heaters in the units designed to burn gas 1 fuels subcategory with a heat input capacity of less than or equal to 5 million Btu per hour must complete a tune-up every 5 years as specified in 40 CFR 63.7540. (96-HEATER-01 and 96-HEATER-20)
 - (2) Boilers and process heaters in the units designed to burn gas 1 fuels subcategory with a heat input capacity greater than 5 million Btu per hour and less than 10 million Btu per hour must complete a tune-up biennially as specified in 40 CFR 63.7540. (96-HEATER-02)