Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

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DRAFT/PROPOSED

STATEMENT OF LEGAL AND FACTUAL BASIS

Columbia Gas Transmission, LLC
Botetourt, Virginia
Permit No. BRRO-20157

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9VAC5 Chapter 80, Columbia Gas Transmission, LLC has applied for a Title V Operating Permit for its Botetourt County facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Permit Writer: _____ Date: _____
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BRRO Air Permit Manager: _____ Date: _____
Paul R. Jenkins

BRRO Regional Director: _____ Date: _____
Robert J. Weld

FACILITY INFORMATION

Permittee
Columbia Gas Transmission LLC
700 Louisiana Street, Suite 1300
Houston, TX 77002

Facility
Gala Compressor Station
15971 Botetourt Road
Eagle Rock, VA 24085

County-Plant Identification Number: 51-023-00009

FACILITY DESCRIPTION

NAICS Code: 486210 – Pipeline Transport of Natural Gas

Columbia Gas Transmission LLC (CGT) owns and operates the Gala Compressor Station, which is a natural gas pipeline compressor station located in Botetourt County, Virginia. The facility has been in operation since 1972 or earlier and is located approximately 3.5 miles north of Eagle Rock, Virginia along U.S. Highway 220. The center of the facility is located at approximately 604.81 kilometers (km) East, 4,172.08 km North (Universal Transverse Mercator coordinates, Zone 17S).

Natural gas is received at the facility via gas pipelines from an upstream compressor station. It is then compressed and pumped into outlet pipes for transmission to a downstream station. The compressor engines utilized by the facility consist of two White-Superior 8GTLA compressor engines (01203 and 01204) each rated at 1,100 hp and one Superior 16SGTB compressor engine (01205) rated at 2,650 hp. Each of the three engines utilize oxidation catalyst control devices, installed in November 2013, for carbon monoxide reduction. Additionally, one natural gas fired Waukesha VGF-H24Gl emergency generator (012G2), rated at 585 hp, is used by the facility. All four engines are fueled by pipeline quality natural gas.

The two White-Superior 8GTLA compressor engines (01203 and 01204) were initially permitted on May 2, 1983. The permit was amended on July 13, 2009, and again on March 7, 2011.

The Superior 16SGTB compressor engine (01205) rated at 2,650 hp was originally permitted on March 18, 1997. The permit was modified on March 11, 1999, and again on July 2, 2001. Annual fuel usage is limited to 212 MMscf of natural gas.

The station has the potential to operate seven days per week, twenty-four hours per day, fifty-two weeks per year. The facility has a potential to emit (PTE) of greater than 100 tons per year (tpy) of carbon monoxide (CO) and is therefore considered a Title V major source of CO. PTE of all other criteria pollutants are less than 100 tpy each. PTE for hazardous air pollutants (HAPs) is less than 10/25 tpy making the facility an area source for HAPs.

The source is located in an attainment or area for pollutants and is not a PSD major source. Botetourt County is an emissions control area for nitrogen oxides (NOx) and volatile organic compounds (VOC) per 9VAC5-20-206, but there are no applicable requirements for this facility associated with being located within an emissions control area.

The facility is currently permitted under two minor NSR permits listed below:

1. April 22, 1983 as amended July 13, 2009 and March 7, 2011
   Permits the construction and operation of two White-Superior Reciprocating Engines/Compressors (01203 and 01204).

2. March 18, 1997 as amended March 11, 1999, July 2, 2001 and May 23, 2011
   Permits the construction and operation of one Superior Reciprocating Engine/Compressor (01205).

The facility is currently subject to the Title V permit effective July 7, 2020, and under the application shield provisions of 9VAC5-80-80 F. A Title V renewal application was received on December 19, 2024, and deemed timely and complete on June 12, 2025.

The following applicable federal regulations are included in the Title V permit:

- 40 CFR 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines: This standard applies to the emergency generator engine (012G2), installed 2017.

- 40 CFR 63 Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines: This standard applies to four RICE engines (01203, 01204, 01205 and 012G2).

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, was most recently conducted on January 22, 2025. All reports and other data required by permit conditions or regulations, which are submitted to the DEQ, have been evaluated for compliance. Based on these

compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNITS

Please refer to the Emission Units table on page 3 of the Title V permit for a listing of emissions units, pollution control devices and stacks.

EMISSIONS INVENTORY

Emissions from the facility in 2024 are summarized in the following tables.

2024 Criteria Pollutant in Tons/Year

Emissions	VOC	CO	SO_2	PM_{10}	$PM_{2.5}$	NO_X	CO_2e
Total	0.33	0.62	0.00	0.06	0.02	1.06	147.37

2024 Facility Hazardous Air Pollutant (HAP) Emissions

Pollutant	Hazardous Air Pollutant Emission in Tons/Yr
Formaldehyde	0.06

ENGINE REQUIREMENTS - (01203, 01204, 01205, 012G2)

The facility has four natural gas-fired engines which are utilized to provide compression of natural gas (01203, 01204, 01205) or to provide emergency power (012G2).

Compressor engines 01203 and 01204 are each 1,100 hp and were installed in 1983. Compressor engine 01205 is 2,650 hp and was installed in 1997.

Emergency engine 012G2 is 585 hp and was installed in 2017. This emergency engine is subject to visible emission limits stipulated in 9VAC5 Chapter 50 - New and Modified Stationary sources.

Citations

The following citations from the Virginia Administrative Codes and federal air regulations identify the underlying authorities to implement the specific requirements determined to be applicable in the Title V permit:
9VAC5-50-20 Compliance.
9VAC5-50-30 Performance testing.

9VAC5-50-50 Notification, Records and Reporting.
9VAC5-50-80 Standard for Visible Emissions.
9VAC5-50-260 Standard for stationary sources.
9VAC5-80-110 Permit Content.
9VAC5-80-1180 Standards and Conditions for Granting Permits.
9VAC5-170-160 Conditions on approvals.

The following citations from the Virginia Administrative Codes identify the underlying authorities to implement the specific requirements determined to be applicable in the NSR permits:

Limitations

Condition 1 Emissions from engine 01203 and 01204 shall be controlled by low emission combustion using Clean-Burn technology.

Condition 2 The approved fuel for engines 01203 and 01204 is natural gas.

Condition 3 Engines 01203 and 01204 shall not exceed hourly and annual emission limits.

Condition 4 Visible emissions from engines 01203 and 01204 shall not exceed the visible emissions limit.

Condition 5 Emissions from engine 01205 shall be controlled by low emissions combustion using Clean-Burn technology.

Condition 6 The approved fuel for engine 01205 is natural gas.

Condition 7 Engine 01205 shall not exceed the annual natural gas throughput limit.

Condition 8 Engine 01205 shall not exceed hourly and annual emission limits.

Condition 9 Visible emissions from engine 01205 shall not exceed the visible emissions limit.

Condition 10 Visible emissions from emergency engine 012G2 shall not exceed the visible emissions limit.

Condition 11 The approved fuel for emergency engine 012G2 is natural gas.

Recordkeeping

Condition 12 The permittee is required to maintain records for engines 01203 and 01204.

Condition 13 The permittee shall comply with good air pollution control practices.

Condition 14 The permittee is required to maintain records for engine 01205.

Condition 15 The permittee is required to maintain records for emergency engine 012G2.

Testing

Condition 16 The facility shall be constructed to allow for emissions testing.

Condition 17 The emergency engine shall be constructed to allow for emissions testing.

Condition 18 If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate method(s).

Visible emissions observations of the engines (01203,01204, 01205, and 012G2) are not included because properly maintained engines firing natural gas are not expected to produce visible emissions. Requirements for operation of the engines in a manner consistent with good air pollution control practices for minimizing emissions (Condition 62), the requirement to fire the engines with natural gas only (Conditions 2, 6, and 11), in addition to the general compliance, monitoring, testing, and recordkeeping requirements in the MACT Subpart ZZZZ section and the NSPS Subpart JJJJ section meet permit content obligations at 9VAC5-80-110 E (monitoring) & K (compliance) and are considered sufficient to assure compliance with the limits included in this permit.

MACT SUBPART ZZZZ – Stationary Reciprocating Internal Combustion Engine Requirements - Engines (01203, 01204, 01205, 012G2)

Review of MACT Subpart ZZZZ "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines" as applicable to engines 01203, 01204, 01205, and 012G2:

The four engines, located at an area source of HAP, are subject to MACT Subpart ZZZZ. The Title V permit conditions summarize the Subpart ZZZZ requirements; however, the permittee is responsible for complying with every Subpart ZZZZ requirement that is applicable to engines 01203, 01204, 01205 and 012G2. Engines 01203, 01204, and 01205 are classified as existing non-emergency, non-black start 4SLB stationary RICE >500 hp located at an area source of HAP emissions.

Emergency engine 012G2 is classified as a new stationary RICE. The permittee shall comply with 40 CFR 63 Subpart ZZZZ by complying with the applicable requirements of 40 CFR 60 Subpart JJJJ.

See the table below for engine data:

Unit Ref No.	Construction Date	Constructed pre-6/12/2006?	Fuel	Site Rating (> 100 hp?)	Engine	MACT ZZZZ Classification
01203	1983	Yes	Natural Gas	Yes	SI Engine	Existing
01204	1983	Yes	Natural Gas	Yes	SI Engine	Existing
01205	1997	Yes	Natural Gas	Yes	SI Engine	Existing
012G2	2017	No	Natural Gas	Yes	SI Engine	New

General Compliance Requirements

Condition 19 The permittee is required to comply with the requirements in 40 CFR 63 Subpart ZZZZ.

Condition 20 The permittee shall follow good air pollution control practices.

Condition 21 For engine 012G2, the permittee is required to comply with 40 CFR 63 Subpart ZZZZ by complying with 40 CFR 60 Subpart JJJJ.

Condition 22 The permittee shall comply with the applicable general provisions.

Emission and Operating Limitations

Condition 23 The permittee shall comply with operation requirements.

Condition 24 The permittee is required to minimize the engine's time spent at idle and minimize the engine's startup time.

Testing

Condition 25 The permittee shall comply with performance testing requirements. Results shall be submitted as specified.

Continuous Compliance Requirements

Condition 26 The permittee shall continuously monitor and collect data as specified.

Condition 27 The permittee shall demonstrate continuous compliance as specified.

Notifications, Reports, and Recordkeeping

Condition 28 The permittee shall report each instance in which the source did not meet applicable operation limits and operation requirements as specified.

Condition 29 The permittee shall comply with reporting requirements as specified.

Condition 30 The permittee shall retain the required records as stipulated.

Condition 31 The permittee shall keep the required records in a suitable, readily available form.

NSPS SUBPART JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines - Emergency Generator (012G2)

Review of NSPS Subpart JJJJ, "Standards of Performance for Stationary Spark Ignition Internal Combustion Engines" as applicable to 012G2:

Subpart JJJJ applies to spark ignition internal combustion engines that commenced construction after June 12, 2006 and were manufactured on or after July 1, 2007, for engines with a maximum engine power greater than or equal to 500 hp (except lean burn engines with a maximum engine power greater than or equal to 500 hp and less than 1,350 hp); January 1, 2008, for lean burn engines with a maximum engine power greater than or equal to 500 HP and less than 1,350 hp; January 1, 2009, for emergency engines with a maximum engine power greater than 19 KW (25 hp).

Emergency engine 012G2 is 585 hp and was installed in 2017. It is subject to NSPS Subpart JJJJ. The Title V permit conditions summarize the Subpart JJJJ requirements; however, the permittee is responsible for complying with every Subpart JJJJ requirement that is applicable to engine 012G2.

Due to the date of their construction, engines 01203, 01204, and 01205 are exempt from Subpart JJJJ.

See the table below for engine data:

Unit Ref No.	Equipment Description	Fuel	Rating (kW)	Rating (hp)	Constructed after June 12, 2006	Exempt from JJJJ
01203	White-Superior 8GTLA Reciprocating Engine	Natural Gas	820	1,100	1983	Yes
01204	White-Superior 8GTLA Reciprocating Engine	Natural Gas	820	1,100	1983	Yes
01205	Superior 16SGTB Reciprocating Engine	Natural Gas	1,976	2,650	1997	Yes
012G2	Waukesha VGF-H2GL	Natural Gas	436	585	2017	No

General Compliance Requirements

Condition 32 The permittee shall comply with the applicable requirements of Subpart JJJJ.

Condition 33 The permittee shall comply with the applicable general provisions.

Emission Standards

Condition 34 The permittee shall comply with emission standards for the entire life of the engine.

Continuous Compliance Requirements

Condition 35 The permittee shall demonstrate compliance as stipulated.

Condition 36 The permittee shall operate the engine as required.

Condition 37 The permittee may operate the engine using propane as an alternative fuel as stipulated.

Testing

Condition 38 If propane is used other than as specified, a performance test may be required.

Condition 39 If the permittee conducts performance tests on the engine, it shall follow the specified procedures.

Recordkeeping

Condition 40 The permittee shall keep records of the information specified.

Condition 41 If the engine does not meet the applicable standards for emergency engines, the permittee shall install a non-resettable hour meter.

Reporting

Condition 42 The permittee shall submit a copy of each performance test as specified.

STREAMLINED REQUIREMENTS

None identified.

CONDITIONS NOT INCLUDED IN THE TITLE V PERMIT

The following conditions have not been included in the Title V permit as they have already been completed:

- Initial Compliance, MACT Subpart ZZZZ- 40 CFR 63.6595
- Initial Compliance Demonstration, MACT Subpart ZZZZ- 40 CFR 63.6630

The following conditions in the May 23, 2011 minor NSR Permit have not been included in the Title V Permit for the reasons stated below:

- Condition 2 (emission unit construction) was completed, and therefore this underlying condition is no longer applicable.

- Condition 3 (existing emission unit replacement) was completed, and therefore this underlying condition is no longer applicable.

- Conditions 8 and 9 (initial performance tests) were completed, and therefore these underlying conditions are no longer applicable.

- Condition 12 (initial notifications) was completed, and therefore this underlying condition is no longer applicable.

- Condition 19 (commencement of construction) was completed, and therefore this underlying condition is no longer applicable.

INSIGNIFICANT EMISSIONS UNITS

Historically, HTR1 was a 2.0 MMBtu/hr line heater that was reportedly not owned or operated by the Source, but that was located and operated on the same property as the Source by another company. HTR2 was reportedly a 0.45 MMBtu/hr line heater that was operated, owned, and located on the property of the Source. HTR1 (2.0 MMbtu/hr line heater) was included in the insignificant emissions unit list per the DEQ's interpretation of common control per APG-204.

During the current Title V application review, the Source reported a historic transpositional error. The Source states that the 2.0 MMBtu/hr line heater is owned, operated and located on the property of the Source, and the 0.45 MMBtu/hr line heater is located on the property of the Source but is owned and operated by Nisource – Columbia Gas of Virginia. This transpositional error has been addressed.

Additionally, the Source rebuts that HTR2 (0.45MMBtu/hr line heater) does not fit under the definition of common control and that they do not believe that it should remain under their permit. The Source stated that while they do have access to the heater, the owner maintains its own access through its own gate. The Source does not maintain it, nor do they control or hire those who work on it. The Source also does not control the heater's inputs or outputs. The Source has stated that HTR2 is wholly owned and operated by another owner. Even in an emergency, the Source would not be able to access or fix the heater due to Operator Qualifications needed by DOT and by the PSC for the state.

Due to this rebuttal, HTR2 has been removed from the Sources insignificant emissions unit list.

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9VAC5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9VAC5-80-720B)	Rated Capacity (9VAC5-80-720C)
BLR3	Heating system boiler, natural gas fired	9VAC5-80-720C	-	0.85 MMBtu/hr
HTR1	Line heater number 1	9VAC5-80-720C	-	2.0 MMBtu/hr
A10	Used oil tank	9VAC5-80-720C	-	550 gal
A11	Pipeline liquids tank	9VAC5-80-720B	VOC	-
A12	Used glycol tank	9VAC5-80-720B	VOC	-
A14	Glycol tank	9VAC5-80-720B	VOC	-
A15	Lube oil tank	9VAC5-80-720C	-	550 gal

[1]The citation criteria for insignificant activities are as follows:
9VAC5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
9VAC5-80-720 B - Insignificant due to emission levels
9VAC5-80-720 C - Insignificant due to size or production rate

COMPLIANCE PLAN

N/A.

PERMIT SHIELD AND INAPPLICABLE REQUIREMENTS

Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the date of permit issuance and specifically identified in the permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

- 40 CFR 60 Subpart OOOO, OOOOa, and OOOOb (Standards of Performance for Crude Oil and Natural Gas Facilities).

  These NSPS standards do not apply to the Gala Compressor Station because there are no affected facilities that commenced construction, modification or reconstruction after August 23, 2011 and on or before September 18, 2015 (Subpart OOOO), after September 18, 2015 (Subpart OOOOa), or after December 6, 2022 (Subpart OOOOb).

- 40 CFR 64 Compliance Assurance Monitoring (CAM).

  This standard does not apply to any emission units at the facility as the oxidation catalysts were installed to control CO in accordance with MACT Subpart ZZZZ. As the requirements in this draft permit originate from a NSPS or MACT proposed after November 15, 1990, the rule must contain sufficient monitoring, recordkeeping, and reporting requirements at promulgation to provide reasonable assurance of compliance with emission limitations and standards. Subsequently, the source is exempt from CAM for CO under 40 CFR 64.2 (b)(1)(i). Additionally, no emissions units at the facility utilize a control device to achieve compliance with VOC or NOx emission limits. Engines 01203, 01204, and 01205 are lean burn engines that are designed to reduce NOx emissions by operating at high air-to-fuel ratios.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9VAC5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

Federal Enforceability

Article 1 (9VAC5-80-110 N) states that all terms and conditions in the Title V permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.

Permit Expiration

This condition refers to the DEQ taking action on a permit application. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.2-604 and §10.1-1185 of the Code of Virginia, and the "Department of Environmental Quality Agency Policy Statement No. 2-09".

This general condition cite(s) the Article(s) that follow(s):

Article 1 (9VAC5-80-50 et seq.), Part II of 9VAC5 Chapter 80. Federal Operating Permits for Stationary Sources

This general condition cites the sections that follow:
9VAC5-80-80. Application
9VAC5-80-140. Permit Shield
9VAC5-80-150. Action on Permit Applications

Failure / Malfunction Reporting

Section 9VAC5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9VAC5-20-180 is from the general regulations. All affected facilities are subject to section 9VAC5-20-180 including Title V facilities. A facility may make a single report that meets the requirements of 9VAC5-20-180. The report must be made within four daytime business hours of discovery of the malfunction.

In order for emission units to be relieved from the requirement to make a written report in 14 days the emission units must have continuous monitors meeting the requirements of 9VAC5-50-410 or 9VAC5-40-41.

This general condition cites the sections that follow:

9VAC5-40-41. Emissions Monitoring Procedures for Existing Sources
9VAC5-40-50. Notification, Records and Reporting
9VAC5-50-50. Notification, Records and Reporting

This general condition contains a citation from the Code of Federal Regulations as follows:
40 CFR 60.13 (h). Monitoring Requirements.

Permit Modification

This general condition cites the sections that follow:

9VAC5-80-50. Applicability, Federal Operating Permit for Stationary Sources
9VAC5-80-190. Changes to Permits
9VAC5-80-260. Enforcement
9VAC5-80-1100. Applicability, Permits For New and Modified Stationary Sources
9VAC5-80-1605. Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas
9VAC5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

This general condition contains a citation from the Code of Federal Regulations that follows:
40 CFR 61.145, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to demolition and renovation.
40 CFR 61.148, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to insulating materials.
40 CFR 61.150, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to waste disposal.

This general condition cites the regulatory sections that follow:
9VAC5-60-70. Designated Emissions Standards
9VAC5-80-110. Permit Content

STATE-ONLY ENFORCEABLE REQUIREMENTS

The are no State-Only Enforceable Requirements in the Title V permit.

FUTURE APPLICABLE REQUIREMENTS

40 CFR 60 Subpart OOOOc

Emissions Guidelines for Greenhouse Gas (GHG) emissions from Existing Crude Oil and Natural Gas Facilities - the requirements of NSPS OOOOc will be applicable to the source, Columbia Gas Transmission, LLC – Gala Compressor Station on March 9, 2029. The regulation requires Virginia to submit a state plan for implementation of the emission guidelines by March 9, 2026. The source has three years (36 months) to comply after the deadline for state submission.

Good Neighbor Plan

The Good Neighbor Plan (GNP) requirements addressing the 2015 8-hour Ozone National Ambient Air Quality Standards were originally scheduled to be effective for the 2026 ozone season (defined as May 1 through September 30 of a calendar year). On June 27, 2024, the Supreme Court granted a stay of the regulation and returned the petition for review back to the D. C. Circuit Court. Therefore, the requirements of 40 CFR 40.50 and 40 CFR 52.41 have not been included in this Title V permit but may become applicable in the future pending the outcome of the court case.

The GNP was issued on March 15, 2023, to secure significant reductions in ozone-forming emissions of NO_x from power plants and industrial facilities. Affected units include reciprocating internal combustion engines (RICE) that are greater than 1,000 bhp at facilities involved in the transportation of natural gas (40 CFR 52.41(b)). The compressor engines located at this facility, emission unit numbers 01203, 01204, and 01205, may be required to meet the 1.5 g/hp-hr NOx emission limit pending the outcome of the court case. The emergency engine located at the facility, emission unit number 012G2, would not be subject to the emission limits based on engine horsepower rating.

CONFIDENTIAL INFORMATION

No confidential information request has been made. All portions of the Title V permit application are available for public review.

PUBLIC PARTICIPATION

The proposed permit will be placed on public notice from August 27, 2025, to September 26, 2025. The notice will be published in Cardinal News newspaper on August 27, 2025.

[XX] comments were received during the public comment period of [Date] to [Date].

The draft/proposed permit was sent to EPA for concurrent review on August 27, 2025. On [Date], [EPA Representative] responded [results of EPA review].