



COMMONWEALTH of VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY

George Allen
Governor

Becky Norton Dunlop
Secretary of Natural Resources

Northern Virginia Region
Springfield Office
Springfield Corporate Center, Suite 310
6225 Brandon Avenue
Springfield, Virginia 22150
(703) 644-0311
Fax (703) 644-0296

Thomas L. Hopkins
Director

Gregory L. Clayton
Regional Director

CONSENT AGREEMENT

WITH

Transcontinental Gas Pipe Line Corporation
2800 Post Oak Boulevard
P.O. Box 1396
Houston, Texas 77251-1396

Registration No. 71958

SECTION A: Purpose

This Agreement establishes a Reasonably Available Control Technology (RACT) standard for Transcontinental Gas Pipe Line Corporation's Station 185, located in Manassas, Virginia, for the control of nitrogen oxide (NOx) emissions in the Northern Virginia Ozone Nonattainment Area as required by Section 120-04-0408 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution. This RACT standard shall be the basis for NOx emissions control for this plant.

SECTION B: References

Unless the context indicates otherwise, the following words and terms have the meanings assigned to them below:

"Agreement" means this Consent Agreement.

"Board" or "SAPCB" means the State Air Pollution Control Board, a collegiate body of the Commonwealth of Virginia described in § 10.1-1301 of the Code. Particular powers and duties of the Board are described in Section C of this document.

"Code" means the Code of Virginia.

"DEQ" means the Department of Environmental Quality, an agency of the Commonwealth described in § 10.1-1183 of the Code.

"Director" means the Director of the Department of Environmental Quality. Particular powers and duties of the Director are described in Section C of this document.

"Engine Parametric Adjustments" means using a computer-based operating system to adjust variables such as air/fuel ratio, ignition timing, load and speed in order to affect the performance and NOx production of an internal combustion reciprocating engine.

"EPA" means the United States Environmental Protection Agency.

"LEC technology" means Low Emission Combustion technology. LEC requires that an engine be rebuilt with specially designed and manufactured turbochargers, cylinders, heads, and fuel distribution systems.

"Major Stationary Source" means any stationary source which emits, or has the potential to emit 100 tons per year or more of any pollutant subject to regulation under the federal clean air act, or 50 tons per year or more of volatile organic compounds or nitrogen oxides in ozone nonattainment areas classified as serious in Appendix K of the SPCB Regulations. The area in which the affected facility is located is a nonattainment area classified as serious in Appendix K of the SPCB Regulations.

"New source review program" means a program for the preconstruction review and permitting of new stationary sources or expansions to existing ones in accordance with regulations promulgated to implement the requirements of §§ 110 (a) (2) (C), 165 (relating to permits in prevention of significant deterioration areas) and 173 (relating to permits in nonattainment areas) of the federal Clean Air Act.

"Non-CTG" means a source type for which the EPA has not issued a Control Technique Guideline (CTG), and thus has not established RACT for that source type.

"NOx" means nitrogen oxides as defined by Section 120-01-02 of the SPCB Regulations.

"Reasonably Available Control Technology" or "RACT" means the lowest emission limit that a particular source is capable of meeting by the application of control technology that is both reasonably available, as well as technologically and economically feasible.

"Regional Director" means the Director of the Northern Virginia Regional Office of the Department of Environmental Quality, 6225 Brandon Avenue, Suite 310, Springfield, Virginia 22150.

"SAPCB Regulations" means the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution.

"SIP" means the State Implementation Plan.

"Theoretical potential to emit" means the maximum capacity of a stationary source to emit a pollutant under its physical and operational design. It is based on emissions at design capacity or maximum production and maximum operating hours (8,760 hours per year) before add-on controls, unless the source is subject to state and federally enforceable permit conditions which limit production rates or hours of operation.

"Transco", or "affected facility" means Transcontinental Gas Pipe Line Corporation's station 185 located in Manassas, Virginia.

SECTION C: Authority

1. Chapter 13 of Title 10.1 of the Code creates the Board and vests in it the authority to supervise and control various aspects of air pollution in the Commonwealth. Among the Board's powers is the authority to promulgate regulations "abating, controlling and prohibiting" air pollution, found in § 10.1-1308 of the Code.
2. Pursuant to its authority, the Board has promulgated the SAPCB Regulations, which first took effect March 17, 1972 and have been periodically amended.
3. Pursuant to § 10.1-1307 D of the Code, the Board has the authority to issue orders to diminish or abate the causes of air pollution and to enforce its regulations. Orders of the Board are enforceable pursuant to §§ 10.1-1316 and 10.1-1320 of the Code.

4. The Director is the executive officer of the Board. Under § 10.1-1307.2 A of the Code, the Director is to perform those duties required of him by the Board. Additionally under § 10.1-1307.3 of the Code, the Director has such powers to supervise, administer and enforce the provisions of Chapter 13 of Title 10.1 of the Code, as well as the regulations and orders of the Board, as are conferred upon him by the Board. The powers and duties conferred and imposed upon the Director under §§ 10.1-1307.2 and 10.1-1307.3 of the Code are continued under § 10.1-1185 of the Code.
5. Under § 10.1-1307.2 B of the Code, the Director may be vested with the authority of the Board when it is not in session, subject to such regulations or delegation as may be prescribed by the Board. Appendix F of the SAPCB Regulations contains the Delegation of Authority from the Board to the Director. In Section II A of Appendix F the Director is given the authority, with some exceptions, to act for the Board when it is not in session and to issue consent orders and emergency special orders.

SECTION D: Findings

1. Transco operates a natural gas compressor station (Station 185) in Manassas, Virginia which is located in Prince William County.
2. Section 120-04-0407 and 120-04-0408 of the SAPCB Regulations requires RACT for all non-CTG major stationary sources of VOC and NOx emissions in the Northern Virginia Ozone Nonattainment Area, which includes the Cities of Alexandria, Fairfax, Falls Church, Manassas, Manassas Park, and the counties of Arlington, Fairfax, Loudoun, Prince William and Stafford.
3. Transco was determined to be a potential non-CTG major stationary source of VOC and NOx emissions in the Northern Virginia Ozone Nonattainment Area.
4. On February 25, 1993, the Board notified Transco of its requirement to develop a RACT standard for VOC and NOx emissions from the affected facility.
5. Transco submitted a RACT analysis dated August 31, 1993, to the DEQ on September 3, 1993.

6. The DEQ provided comments to Transco regarding the VOC section of the August 31, 1993, RACT analysis on October 27, 1993.
7. The DEQ provided comments to Transco regarding the NOx section of the August 31, 1993, RACT analysis on November 30, 1993.
8. Transco provided supporting documentation dated December 1, 1993, to the DEQ on December 2, 1993, which confirms Transco's conclusion that Station 185 is not a major source for VOC emissions.
9. The DEQ provided comments to Transco on December 21, 1993, regarding Transco's December 1, 1993, letter. The DEQ concurred that Transco was no longer considered a major source of VOC emissions.
10. Transco submitted a revised NOx RACT analysis to the DEQ on March 31, 1994.
11. A meeting between DEQ and Transco was held May 12, 1994, in order to discuss Transco's RACT analysis.
12. Transco submitted a revised RACT analysis dated July 19, 1994, to the DEQ on July 20, 1994.
13. The DEQ provided comments to Transco regarding the July 19, 1994, RACT analysis on September 23, 1994.
14. Transco submitted the "Enforcement, Determination of Compliance, and Monitoring and Record Keeping" sections of the July 19, 1994, RACT analysis to the DEQ on October 14, 1994.
15. The DEQ provided comments to Transco regarding the October 14, 1994, revisions on November 3, 1994.
16. Transco submitted revised "Enforcement, Determination of Compliance, and Monitoring and Record Keeping" sections of the July 19, 1994, RACT analysis to the DEQ on November 11, 1994.
17. The DEQ provided comments to Transco regarding the November 11, 1994, revisions on November 17, 1994.
18. Transco submitted a revised RACT analysis dated December 8, 1994, to the DEQ on December 9, 1994.

19. The DEQ provided comments to Transco regarding the December 8, 1994, RACT analysis on January 27, 1995.
20. Transco submitted a revised Section 3.3.3, in draft form, to the DEQ for review and comment on February 16, 1995.
21. In a February 22, 1995, letter to Transco, The DEQ gave tentative approval of the December 8, 1994, RACT analysis provided that the revised section 3.3.3 was incorporated into the document. DEQ requested copies of the final version of the analysis.
22. Transco submitted pages dated February 24, 1995, to be utilized in updating the December 8, 1994, RACT analysis. The DEQ received the updated pages on February 27, 1995.
23. The following pre-RACT uncontrolled emissions (theoretical potential to emit) are summarized in the RACT analysis:
 - a. Uncontrolled VOC emissions from the facility's ten (10) 2050 horsepower Ingersol Rand 412-KVS mainline engines are estimated to be 46.28 tons per year.
 - b. Uncontrolled VOC emissions from the facility's two (2) 408 horsepower Ingersol Rand PSVG-6 auxiliary generators are estimated to be 0.630 tons per year.
 - c. Uncontrolled VOC emissions from the facility's one (1) 100 horsepower Waukesha F817G air compressor are estimated to be 0.108 tons per year.
 - d. Uncontrolled VOC emissions from the facility's two (2) gas-fired boilers are estimated to be 0.090 tons per year.
 - e. Uncontrolled fugitive/blowdown VOC emissions from the facility are estimated to be 2.31 tons per year.
 - f. Total uncontrolled VOC emissions from the affected facility are estimated to be 49.42 tons per year.
 - g. Uncontrolled NOx emissions from the facility's ten (10) 2050 horsepower Ingersol Rand 412-KVS mainline engines are estimated to be 4434.47 tons

- per year.
- h. Uncontrolled NOx emissions from the facility's two (2) 408 horsepower Ingersol Rand PSVG-6 auxiliary generators are estimated to be 124.49 tons per year.
 - i. Uncontrolled NOx emissions from the facility's one (1) 100 horsepower Waukesha F817G air compressor are estimated to be 6.45 tons per year.
 - j. Uncontrolled NOx emissions from the facility's two (2) gas-fired boilers are estimated to be 3.55 tons per year.
 - k. Total uncontrolled NOx emissions from the affected facility are estimated to be 4568.96 tons per year.
24. Transco does not have the theoretical potential to emit 50 tons per year or greater of VOC, as referenced in Paragraphs D.23.a-f. Thus, Transco is exempt from the VOC RACT requirements as defined in 120-04-0407 of the SAPCB Regulations.
25. DEQ recognizes that the items referenced in Paragraphs D.23.h-j are exempt from RACT as defined in Appendix T of the SAPCB Regulations, Section III.C.3 and Section III.C.4.

SECTION E: Agreement

Accordingly, the Board and Transco agree that:

1. RACT for the ten (10) 2050 horsepower mainline engines is the control of NOx emissions by LEC and Engine Parametric Adjustments.
2. Stack testing shall be conducted for nitrogen oxides emissions from a minimum of (3) three of the ten (10) 2050 horsepower Ingersol Rand 412-KVS mainline engine stacks, in order to determine actual emission factors. The actual units tested shall be selected by the DEQ Regional Director. The tests may be staged or conducted concurrently, but in no event shall tests be conducted later than 60 days after this agreement has become effective, provided that Transco shall have at least thirty (30) days following receipt of the Regional Director's approval of the testing protocol. Tests shall be conducted and reported and data reduced

as set forth in Section 120-05-03 of State Regulations. During all tests, the mainline engines shall be required to be operated at a minimum of 80% of their maximum rated output capacity. The details of the tests are to be arranged with the Regional Director. Transco shall submit a test protocol at least thirty (30) days prior to testing. Four (4) copies of the test results shall be submitted to the Regional Director within 45 days after test completion.

3. Transco shall comply with all applicable SAPCB Regulations with respect to RACT requirements for monitoring, notification, recordkeeping, reporting, maintenance, and malfunction.
4. At any time in the future, should Transco plan any modifications (within the context of the new source review program) of the affected facility covered by this Agreement, Transco shall have the right to apply to the Board for a new source review permit and the Board may consent to such modifications provided such modifications will meet all of the new source review permit program regulatory requirements in existence at that time.
5. The Board may modify, rewrite, or amend this Agreement with the consent of Transco, for good cause shown by Transco, or on its own motion provided approval of the changes is accomplished in accordance with SAPCB regulations, the Administrative Process Act (§ 9-6.14:1 et. seq.) and 40 CFR Part 51 (Requirements for Preparation, Adoption, and Submittal of Implementation Plans).
6. So long as this Agreement remains in effect, Transco waives the right to any hearing pursuant to §§ 9-6.14:11 and 9-6.14:12 of the Code and to judicial review of any issue of fact or law contained herein. Nothing herein, however, shall be construed as a waiver of the right to a hearing or to judicial review of any action taken by the Board to enforce this Agreement.
7. Failure by Transco to comply with any of the terms of this Agreement shall constitute a violation of an Order of the Board. Nothing herein shall waive the initiation of appropriate enforcement actions or the issuance of additional orders as appropriate by the Board as a result of such violations. Nothing herein shall affect appropriate enforcement actions by any

other federal, state, or local regulatory authority.

8. Transco declares it has received fair and due process under the Administrative Process Act (§ 9-6.14:1 et. seq.).
9. This Agreement shall become effective upon signature by both parties and shall continue in effect indefinitely or until otherwise terminated by the Board.

The foregoing Consent Agreement has been executed on behalf of the STATE AIR POLLUTION CONTROL BOARD of the COMMONWEALTH OF VIRGINIA and on behalf of Transcontinental Gas Pipe Line Corporation, each by its duly authorized representatives, or self, on the dates indicated below.

DEPARTMENT OF ENVIRONMENTAL QUALITY
OF THE COMMONWEALTH OF VIRGINIA

SEP 7 5, 1996
(date)

BY: [Signature]
Thomas L. Hopkins
Director

TRANSCONTINENTAL GAS PIPE LINE
CORPORATION

July 12th 1996
(date)

BY: [Signature]
Cuba Wadlington, Jr.,
Senior Vice President
and General Manager

645
W.P.N.
[Signature]

STATE OF Texas
CITY/COUNTY OF Dallas

The foregoing instrument was acknowledged before me this 12th day of July, 1996, by Cuba Wadlington, Jr., Senior Vice President and General Manager, of Transcontinental Gas Pipe Line Corporation, a Delaware Corporation, on behalf of the Corporation.

My commission expires 11-13-98

[Signature]
Notary Public

