

VIA FEDERAL EXPRESS



February 10, 2021

TRANSCO PIPELINE
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Attention: Industrial Compliance Division
Maryland Department of the Environment
Air Quality Compliance Program
1800 Washington Boulevard, 7th Floor
Baltimore, Maryland 21230

FEB 11 2021

Re Blowdown Notification Plan
Transcontinental Gas Pipe Line Company, LLC
Compressor Station 190 – Howard County, Maryland
Part 70 Operating Permit No 24-027-00223

To Whom It May Concern:

In accordance with new Maryland Department of the Environment (MDE) requirements established under the Code of Maryland Title 26, Subtitle 11, Chapter 41 (COMAR 26.11.41), Transcontinental Gas Pipe Line Company, LLC (Transco) is submitting the attached Blowdown Notification Plan for Compressor Station 190.

This document serves as the site-specific Blowdown Notification Plan to satisfy the requirements of COMAR 26.11.41.07(B), which is required to be submitted to the MDE for review and approval by February 14, 2021.

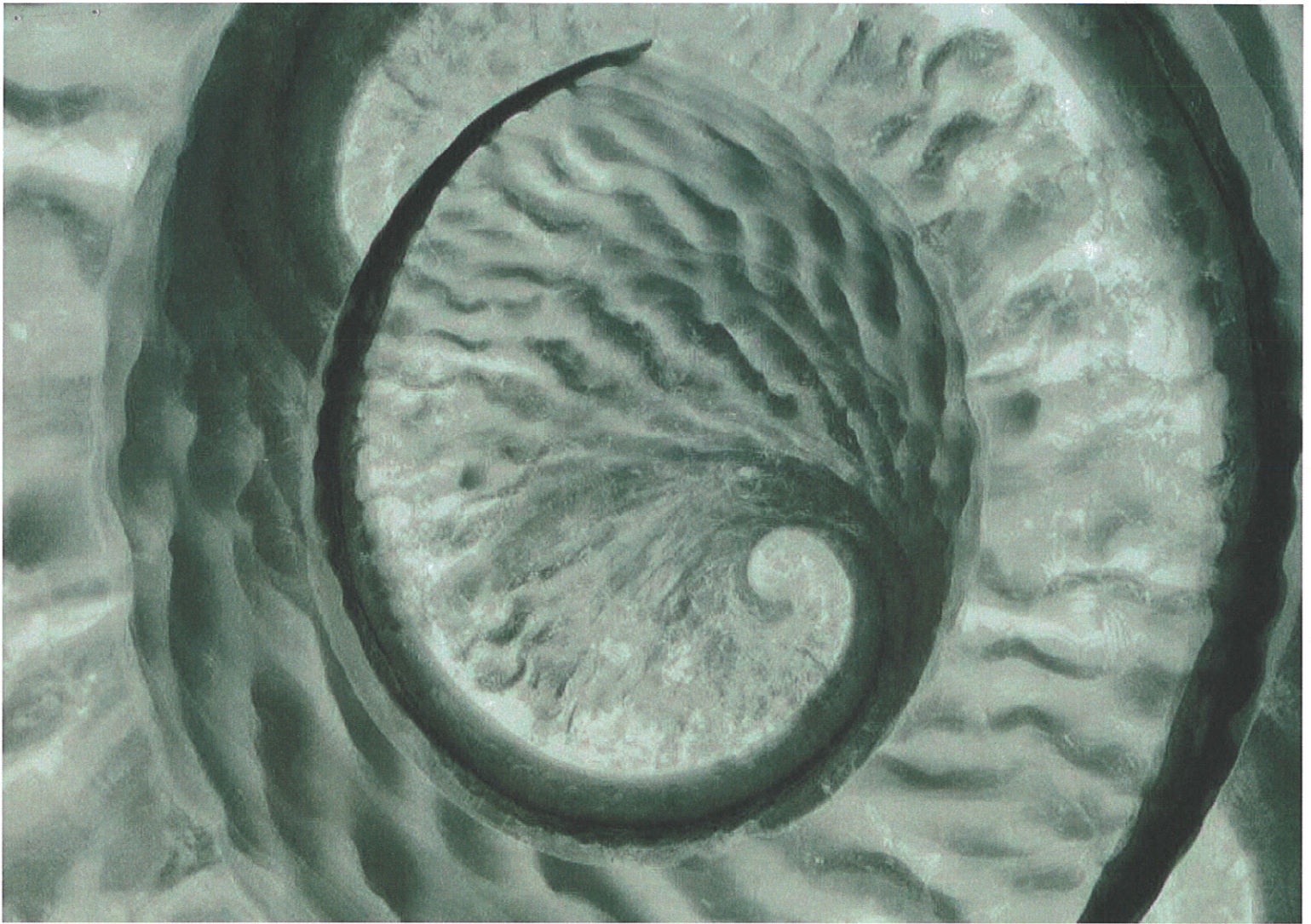
If you have any questions regarding this transmittal or require additional information, please contact me at (609) 285-2407 or by email at Michael.Hahn@Williams.com.

Sincerely,

A handwritten signature in black ink that reads "Michael Hahn". The signature is written in a cursive, flowing style.

Michael Hahn
Environmental Specialist V

Enclosures Attached



Blowdown Notification Plan (COMAR 26.11.41)

Transco Compressor Station 190 Howard
County, Maryland

February 10, 2021

Project No.: 0578546

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1. INTRODUCTION AND OBJECTIVES

On October 23, 2020, the Maryland Department of the Environment (MDE) adopted new regulations under the Code of Maryland Title 26, Subtitle 11, Chapter 41 (COMAR 26.11.41) for the Control of Methane Emissions from the Natural Gas Industry. The new regulations became effective on November 16, 2020. COMAR 26.11.41 establishes blowdown notification requirements for existing, new, modified, or reconstructed natural gas compressor stations, natural gas underground storage facilities, and liquefied natural gas facilities.

Operators subject to COMAR 26.11.41 are required to prepare a Blowdown Notification Plan, which outlines procedures for contacting the local authorities, the MDE, and interested parties of blowdown events in excess of 1,000,000 standard cubic feet (scf). The Blowdown Notification Plan must include the elements specified in COMAR 26.11.41.07(B)(1)-(6), which includes the following information:

- The notification format used to provide notification to the local authorities, MDE, and other interested parties;
- A public outreach plan to inform interested parties of the availability to be notified;
- The affected facilities responsible personnel for blowdown notifications; and
- A sitemap of the facility with clearly marked designated area(s) where blowdowns in excess of 1,000,000 have the potential to occur.

This document serves as the site-specific Blowdown Notification Plan to satisfy the requirements of COMAR 26.11.41.07(B) for Compressor Station 190, which is owned and operated by Transcontinental Gas Pipe Line Company, LLC (Transco).

2. REGULATORY APPLICABILITY

2.1 Affected Facility Definitions

For determination of regulatory applicability, the following definitions apply:

- Affected facilities means any of the following facilities:
 - Cove Point Liquefied Natural Gas Facility;
 - Myersville Natural Gas Compressor Station;
 - Accident Natural Gas Compressor Station and Storage;
 - Rutledge Natural Gas Compressor Station;
 - Ellicott City Natural Gas Compressor Station; and
 - Any new, modified, or reconstructed natural gas compressor station, natural gas underground storage facility, or liquefied natural gas facility.
- Blowdown means the release of pressurized natural gas from a station, equipment, or pipelines into the atmosphere conducted with the intent to lower the pressure in a vessel or pipeline. Blowdown does not include natural gas pneumatics emissions, fugitive component emissions, or compressor seal leakage.
- Natural gas means a naturally occurring mixture or process derivative of hydrocarbon and nonhydrocarbon gases, which has methane as its major constituent.
- Natural gas compressor station means all equipment and components located within a facility fence line associated with moving natural gas from production fields or natural gas processing plants through natural gas transmission pipelines, or within natural gas storage fields.

2.2 Applicability for Blowdown Notification Requirements

The Blowdown Notification Plan requirements of COMAR 26.11.41.07(B) apply to natural gas blowdown events in excess of 1,000,000 scf that occur at a natural gas compressor station that uses natural gas-powered equipment to compress natural gas.

Compressor Station 190 is an existing natural gas compressor station that is an affected facility as outlined 26.11.41.01(B)(1)(e), and therefore, the facility is subject to the Blowdown Notification Plan requirements of COMAR 26.11.41.07(B).

Affected facilities subject to this regulation are required to submit the initial Blowdown Notification Plan to the MDE by February 14, 2021 (within 90 days of the effective date of the regulation). This document serves as the site-specific Blowdown Notification Plan, which has been established to satisfy the requirements of COMAR 26.11.41.07(B)(1)-(6).

3. BLOWDOWN NOTIFICATION PROCEDURES

Within 90 days of the effective date of this regulation, affected facilities are required to submit a Blowdown Notification Plan to the MDE for approval. The Blowdown Notification Plan, as outlined in COMAR 26.11.41.07(B)(1), shall include the information listed in COMAR 26.11.41.07(B)(2)(a)-(d). Sections 3.1 through 3.4 below document Transco's proposed notification procedures.

3.1 Notification Format

For scheduled blowdown event notifications, Transco plans to use its existing contact management system platform to send email notifications to local authorities (Howard County Non-Emergency Office), MDE, and interested parties that register through the blowdown notification webpage. These email notifications will include a webpage link to the blowdown notification webpage.

For unplanned or emergency events, Transco will contact the local authorities (Howard County Non-Emergency Office/first responders) via telephone, as applicable, and provide email notification to MDE and interested parties as described above.

3.2 Public Outreach Plan

To inform interested parties of the availability to be notified of blowdown events in excess of 1,000,000 scf, Transco plans to send hardcopy notifications via mail to local residents. Similar to the Federal Energy Regulatory (FERC) requirements, this inclusion process will be based on a one-half mile radius around the facility. In addition, Transco plans to submit a social media post in the local Ellicott City Patch to facilitate additional signups through the blowdown notification webpage.¹ Sign up information for interested parties will be managed via Transco's contact management system platform.

The planned frequency for public outreach to sign up for notifications will be initially, upon approval of this Blowdown Notification Plan, and every five years thereafter, consistent with the facility's Title V Permit renewal process.

In the event a blowdown in excess of 1,000,000 scf is anticipated to occur, Transco will notify local authorities, MDE, and interested parties as follows:

- For any blowdown event that is scheduled to occur beyond seven days, Transco will provide email notification at least seven days prior to the scheduled event [COMAR 26.11.41.07(B)(3)];
- For any blowdown event that is scheduled to occur in less than seven days, Transco will provide email notification to interested parties as soon as practicable but not later than seven days. Transco will provide an explanation to the MDE of the reason for the blowdown event (COMAR 26.11.41.07(B)(4));
- For any emergency or unplanned blowdown event, Transco will notify the MDE within one hour of the emergency event via email and provide public email notification to interested parties of the blowdown event as soon as practicable but not later than seven days [COMAR 26.11.41.07(B)(5)]; and
- When safety concerns preclude Transco from providing prior notification of an emergency or unplanned blowdown event to MDE, Transco will notify the MDE via telephone/email within 24 hours of the blowdown event indicating the reason(s) why prior notice was not possible.

¹ Ellicott City, MD Patch – Breaking Local News Events, Schools, Weather, and Sports. Available online at: <https://patch.com/maryland/ellcottcity>.

3.3 Responsible Personnel

The following Transco personnel have been identified as the responsible personnel for blowdown notification management at Compressor Station 190:

Primary Contact Information

Bill Scarpinato
Environmental Specialist
345 Greenbrier Drive
Charlottesville, VA 22901
Telephone: (434) 906-8525
Email: Williams.Scarpinato@Williams.com

Alternate Contact Information

Michael Hahn
Environmental Specialist
99 Farber Road
Princeton, NJ 08540
Telephone: (609) 285-2407
Email: Michael.Hahn@Williams.com

Compressor Station 190 General Contact Information

11910 Carrollmill Road
Ellicott City, MD 21042
Telephone: (443) 367-2500

3.4 Facility Sitemap

A detailed sitemap of Compressor Station 190 with designated locations for potential blowdowns in excess of 1,000,000 scf is included in **Appendix A**.

3.5 Implementation Schedule

Upon MDE approval of this Blowdown Notification Plan, Transco requests 90 days to implement activities described in Section 3.2.

APPENDIX A FACILITY SITEMAP

APPENDIX B DOCUMENT REVISION HISTORY

