

EXECUTIVE SUMMARY - ENFORCEMENT MATTER Page 1 of 2
DOCKET NO.: 2007-0041-AIR-E **TCEQ ID:** RN100211838 **CASE NO.:** 32065
RESPONDENT NAME: Transcontinental Gas Pipe Line Corporation

ORDER TYPE:		
<input checked="" type="checkbox"/> 1660 AGREED ORDER	<input type="checkbox"/> FINDINGS AGREED ORDER	<input type="checkbox"/> FINDINGS ORDER FOLLOWING SOAH HEARING
<input type="checkbox"/> FINDINGS DEFAULT ORDER	<input type="checkbox"/> SHUTDOWN ORDER	<input type="checkbox"/> IMMINENT AND SUBSTANTIAL ENDANGERMENT ORDER
<input type="checkbox"/> AMENDED ORDER	<input type="checkbox"/> EMERGENCY ORDER	
CASE TYPE:		
<input checked="" type="checkbox"/> AIR	<input type="checkbox"/> MULTI-MEDIA (check all that apply)	<input type="checkbox"/> INDUSTRIAL AND HAZARDOUS WASTE
<input type="checkbox"/> PUBLIC WATER SUPPLY	<input type="checkbox"/> PETROLEUM STORAGE TANKS	<input type="checkbox"/> OCCUPATIONAL CERTIFICATION
<input type="checkbox"/> WATER QUALITY	<input type="checkbox"/> SEWAGE SLUDGE	<input type="checkbox"/> UNDERGROUND INJECTION CONTROL
<input type="checkbox"/> MUNICIPAL SOLID WASTE	<input type="checkbox"/> RADIOACTIVE WASTE	<input type="checkbox"/> DRY CLEANER REGISTRATION
<p>SITE WHERE VIOLATION(S) OCCURRED: Transco Compressor Station 40, 29979 Highway 105, Sour Lake, Hardin County</p> <p>TYPE OF OPERATION: Natural gas transmission</p> <p>SMALL BUSINESS: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>OTHER SIGNIFICANT MATTERS: There are no complaints. There is no record of additional pending enforcement actions regarding this facility location.</p> <p>INTERESTED PARTIES: No one other than the ED and the Respondent has expressed an interest in this matter.</p> <p>COMMENTS RECEIVED: The <i>Texas Register</i> comment period expired on June 11, 2007. No comments were received.</p> <p>CONTACTS AND MAILING LIST: TCEQ Attorney/SEP Coordinator: None TCEQ Enforcement Coordinator: Ms. Jessica Rhodes, Enforcement Division, Enforcement Team 4, MC 149, (512) 239-2879; Mr. Steven Lopez, Enforcement Division, MC 219, (512) 239-1896 Respondent: Mr. Mark Bisett, Manager, Environmental Compliance, Transcontinental Gas Pipe Line Corporation, P.O. Box 1396, Houston, Texas 77251-1396 Respondent's Attorney: Not represented by counsel on this enforcement matter</p>		

VIOLATION SUMMARY CHART:

VIOLATION INFORMATION	PENALTY CONSIDERATIONS	CORRECTIVE ACTIONS TAKEN/REQUIRED
<p>Type of Investigation: <input type="checkbox"/> Complaint <input type="checkbox"/> Routine <input type="checkbox"/> Enforcement Follow-up <input checked="" type="checkbox"/> Records Review</p> <p>Date(s) of Complaints Relating to this Case: None</p> <p>Date of Investigation Relating to this Case: November 13, 2006</p> <p>Date of NOE Relating to this Case: December 13, 2006 (NOE)</p> <p>Background Facts: This was a routine record review. One violation was documented.</p> <p>AIR</p> <p>Failed to properly report a deviation and failed to report the occurrence of that deviation in a semi-annual deviation report. Specifically, a deviation occurred on October 8, 2005 and was reported on the annual compliance certification form on December 30, 2005, however, the report failed to include the corrective action for the deviation. In the deviation report for the period December 8, 2005 to June 6, 2006 due on July 6, 2006, Transcontinental Gas Pipe Line Corporation failed to include the improper reporting of the violation that occurred on December 30, 2005, as a deviation [30 TEX. ADMIN. CODE §§ 122.143(4), 122.145(2)(A), 122.145(2)(B), 122.145(2)(C), Permit No. O-00668, Special Terms and Conditions (b)(2), and TEX. HEALTH & SAFETY CODE § 382.085(b)].</p>	<p>Total Assessed: \$2,240</p> <p>Total Deferred: \$448 <input checked="" type="checkbox"/> Expedited Settlement <input type="checkbox"/> Financial Inability to Pay</p> <p>SEP Conditional Offset: \$0</p> <p>Total Paid to General Revenue: \$1,792</p> <p>Site Compliance History Classification <input type="checkbox"/> High <input checked="" type="checkbox"/> Average <input type="checkbox"/> Poor</p> <p>Person Compliance History Classification <input type="checkbox"/> High <input checked="" type="checkbox"/> Average <input type="checkbox"/> Poor</p> <p>Major Source: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Applicable Penalty Policy: September 2002</p>	<p>Corrective Actions Taken:</p> <p>The Executive Director recognizes that on January 8, 2007, Transcontinental Gas Pipe Line Corporation submitted a complete Annual Compliance Certification Form for the period December 8, 2004 through December 7, 2005, and a revised semi-annual deviation report for the period January 1, 2006 through June 30, 2006.</p>



Penalty Calculation Worksheet (PCW)

Policy Revision 2 (September 2002)

PCW Revision December 8, 2006

TCEQ

DATES	Assigned	18-Dec-2006	Screening	21-Dec-2006	EPA Due	
	PCW	6-Feb-2007				

RESPONDENT/FACILITY INFORMATION			
Respondent	Transcontinental Gas Pipe Line Corporation		
Reg. Ent. Ref. No.	RN100211838		
Facility/Site Region	10-Beaumont	Major/Minor Source	Major

CASE INFORMATION			
Enf./Case ID No.	32065	No. of Violations	1
Docket No.	2007-0041-AIR-E	Order Type	1660
Media Program(s)	Air Quality	Enf. Coordinator	Jessica Rhodes
Multi-Media		EC's Team	EnforcementTeam 5
Admin. Penalty \$	Limit Minimum	\$0	Maximum
			\$10,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties) *Subtotal 1* **\$2,000**

ADJUSTMENTS (+/-) TO SUBTOTAL 1

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

Compliance History 22% Enhancement *Subtotals 2, 3, & 7* **\$440**

Notes

Culpability No 0% Enhancement *Subtotal 4* **\$0**

Notes

Good Faith Effort to Comply 10% Reduction *Subtotal 5* **\$200**

	Before NOV	NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		X
N/A		(mark with x)

Notes

Total EB Amounts **Approx. Cost of Compliance** **0% Enhancement*** *Subtotal 6* **\$0**
**Capped at the Total EB \$ Amount*

SUM OF SUBTOTALS 1-7 *Final Subtotal* **\$2,240**

OTHER FACTORS AS JUSTICE MAY REQUIRE **Adjustment** **\$0**

Reduces or enhances the Final Subtotal by the indicated percentage. (Enter number only; e.g. -30 for -30%.)

Notes

Final Penalty Amount **\$2,240**

STATUTORY LIMIT ADJUSTMENT *Final Assessed Penalty* **\$2,240**

DEFERRAL 20% Reduction **Adjustment** **-\$448**

Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g. 20 for 20% reduction.)

Notes

PAYABLE PENALTY **\$1,792**

Screening Date 21-Dec-2006

Docket No. 2007-0041-AIR-E

PCW

Respondent Transcontinental Gas Pipe Line Corporation

Policy Revision 2 (September 2002)

Case ID No. 32065

PCW Revision December 8, 2006

Reg. Ent. Reference No. RN100211838

Media [Statute] Air Quality

Enf. Coordinator Jessica Rhodes

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Enter Number Here	Adjust.
NOVs	Written NOVs with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	0	0%
	Other written NOVs	1	2%
Orders	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	1	20%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or consent decrees meeting criteria)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	0	0%
<i>Please Enter Yes or No</i>			
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 22%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Average Performer

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History

Penalty enhancement due to one 1660-style Agreed Order and one NOV for unrelated violations

Total Adjustment Percentage (Subtotals 2, 3, & 7) 22%

Screening Date 21-Dec-2006

Docket No. 2007-0041-AIR-E

PCW

Respondent Transcontinental Gas Pipe Line Corporation

Policy Revision 2 (September 2002)

Case ID No. 32065

PCW Revision December 8, 2006

Reg. Ent. Reference No. RN100211838

Media [Statute] Air Quality

Enf. Coordinator Jessica Rhodes

Violation Number 1

Rule Cite(s)

30 Tex. Admin. Code §§ 122.143(4), 122.145(2)(A), 122.145(2)(B), 122.145(2)(C), Permit No. O-00668, Special Terms and Conditions (b)(2), and Tex. Health & Safety Code § 382.085(b)

Violation Description

Failed to properly report a deviation and failed to report the occurrence of that deviation in a semi-annual deviation report. Specifically, a deviation occurred on 10/8/05 and was reported on the annual compliance certification form on 12/30/05, however, the report failed to include the corrective action for the deviation. In the deviation report for the period 12/08/05 to 6/06/06 due 7/06/06, Transcontinental Gas failed to include the improper reporting of the violation, which occurred on 12/30/05, as a deviation.

Base Penalty \$10,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual			
Potential			

Percent 0%

>> Programmatic Matrix

Falsification	Major	Moderate	Minor
		X	

Percent 10%

Matrix Notes

50% of the rule was not met.

Adjustment \$9,000

\$1,000

Violation Events

Number of Violation Events 2

186 Number of violation days

daily	
monthly	
quarterly	
semiannual	
annual	
single event	X

mark only one with an x

Violation Base Penalty \$2,000

Two single events are recommended.

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$15

Violation Final Penalty Total \$2,240

This violation Final Assessed Penalty (adjusted for limits) \$2,240

Economic Benefit Worksheet

Respondent Transcontinental Gas Pipe Line Corporation
Case ID No. 32065
Reg. Ent. Reference No. RN100211838
Media Air Quality
Violation No. 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
No commas or \$							

Delayed Costs

Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System	\$300	30-Dec-2005	8-Jan-2007	1.0	\$15	n/a	\$15
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)				0.0	\$0	n/a	\$0

Notes for DELAYED costs: Estimated cost to prepare and submit a deviation report and corrected annual compliance certification. Date required is the due date for the annual compliance certification. Final date is the date that compliance was achieved.

Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0

Notes for AVOIDED costs:

Approx. Cost of Compliance \$300
TOTAL \$15

Compliance History

Customer/Respondent/Owner-Operator: CN600406771 Transcontinental Gas Pipe Line Corporation Classification: AVERAGE Rating: 2.78

Regulated Entity: RN100211838 TRANSCO COMPRESSOR STATION 40 Classification: AVERAGE Site Rating: 16.56

ID Number(s): AIR OPERATING PERMITS ACCOUNT NUMBER HF0042L
 AIR OPERATING PERMITS PERMIT 668

AIR NEW SOURCE PERMITS PERMIT 46347
 AIR NEW SOURCE PERMITS PERMIT 47119
 AIR NEW SOURCE PERMITS ACCOUNT NUMBER HF0042L
 AIR NEW SOURCE PERMITS PERMIT 49008
 AIR NEW SOURCE PERMITS AFS NUM 0023

Location: 29979 HWY 105, SOUR LAKE, TX, 77659 Rating Date: September 01 06 Repeat Violator: NO

TCEQ Region: REGION 10 - BEAUMONT

Date Compliance History Prepared: December 22, 2006

Agency Decision Requiring Compliance History: Enforcement

Compliance Period: December 22, 2001 to December 22, 2006

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Jessica Rhodes Phone: 512-239-2879

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
2. Has there been a (known) change in ownership of the site during the compliance period? No
3. If Yes, who is the current owner? N/A
4. If Yes, who was/were the prior owner(s)? N/A
5. When did the change(s) in ownership occur? N/A

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

Effective Date: 08/07/2005

ADMINORDER 2004-0682-AIR-E

Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
 5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failure to report a deviation for at least a six-month period following the issuance of permit O-00668 (issued December 7, 1997).

See addendum for information regarding federal actions.

- B. Any criminal convictions of the state of Texas and the federal government.

N/A

- C. Chronic excessive emissions events.

N/A

- D. The approval dates of investigations. (CCEDS Inv. Track. No.)

- 1 12/13/2006 (517476)
- 2 03/16/2004 (264429)
- 3 01/30/2002 (78020)
- 4 05/04/2006 (461196)
- 5 01/18/2006 (439722)
- 6 05/28/2003 (35966)
- 7 03/31/2005 (349241)

- E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

Date: 01/19/2006 (439722)

Self Report? NO

Classification: Moderate

Citation: 30 TAC Chapter 117, SubChapter B 117.208(d)(7)
30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter F 122.511(b)(11)

Description: 5C THC Chapter 382, SubChapter A 382.085(b)
Failure to conduct quarterly stack test on unit 3 during the second quarter.

F. Environmental audits.

N/A

G. Type of environmental management systems (EMSs).

N/A

H. Voluntary on-site compliance assessment dates.

N/A

I. Participation in a voluntary pollution reduction program.

N/A

J. Early compliance.

N/A

Sites Outside of Texas

N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
TRANSCONTINENTAL GAS PIPE
LINE CORPORATION
RN100211838

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BEFORE THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

AGREED ORDER
DOCKET NO. 2007-0041-AIR-E

I. JURISDICTION AND STIPULATIONS

At its _____ agenda, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Transcontinental Gas Pipe Line Corporation ("Transco") under the authority of TEX. HEALTH & SAFETY CODE ch. 382 and TEX. WATER CODE ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and Transco appear before the Commission and together stipulate that:

1. Transco owns and operates a natural gas transmission plant at 29979 Highway 105 in Sour Lake, Hardin County, Texas (the "Plant").
2. The Plant consists of one or more sources as defined in TEX. HEALTH & SAFETY CODE § 382.003(12).
3. The Commission and Transco agree that the Commission has jurisdiction to enter this Agreed Order, and that Transco is subject to the Commission's jurisdiction.
4. Transco received notice of the violations alleged in Section II ("Allegations") on or about December 18, 2006.
5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by Transco of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
6. An administrative penalty in the amount of Two Thousand Two Hundred Forty Dollars (\$2,240) is assessed by the Commission in settlement of the violations alleged in Section II

("Allegations"). Transco has paid One Thousand Seven Hundred Ninety-Two Dollars (\$1,792) of the administrative penalty and Four Hundred Forty-Eight Dollars (\$448) is deferred contingent upon Transco's timely and satisfactory compliance with all the terms of this Agreed Order. The deferred amount will be waived upon full compliance with the terms of this Agreed Order. If Transco fails to timely and satisfactorily comply with all requirements of this Agreed Order, the Executive Director may require Transco to pay all or part of the deferred penalty.

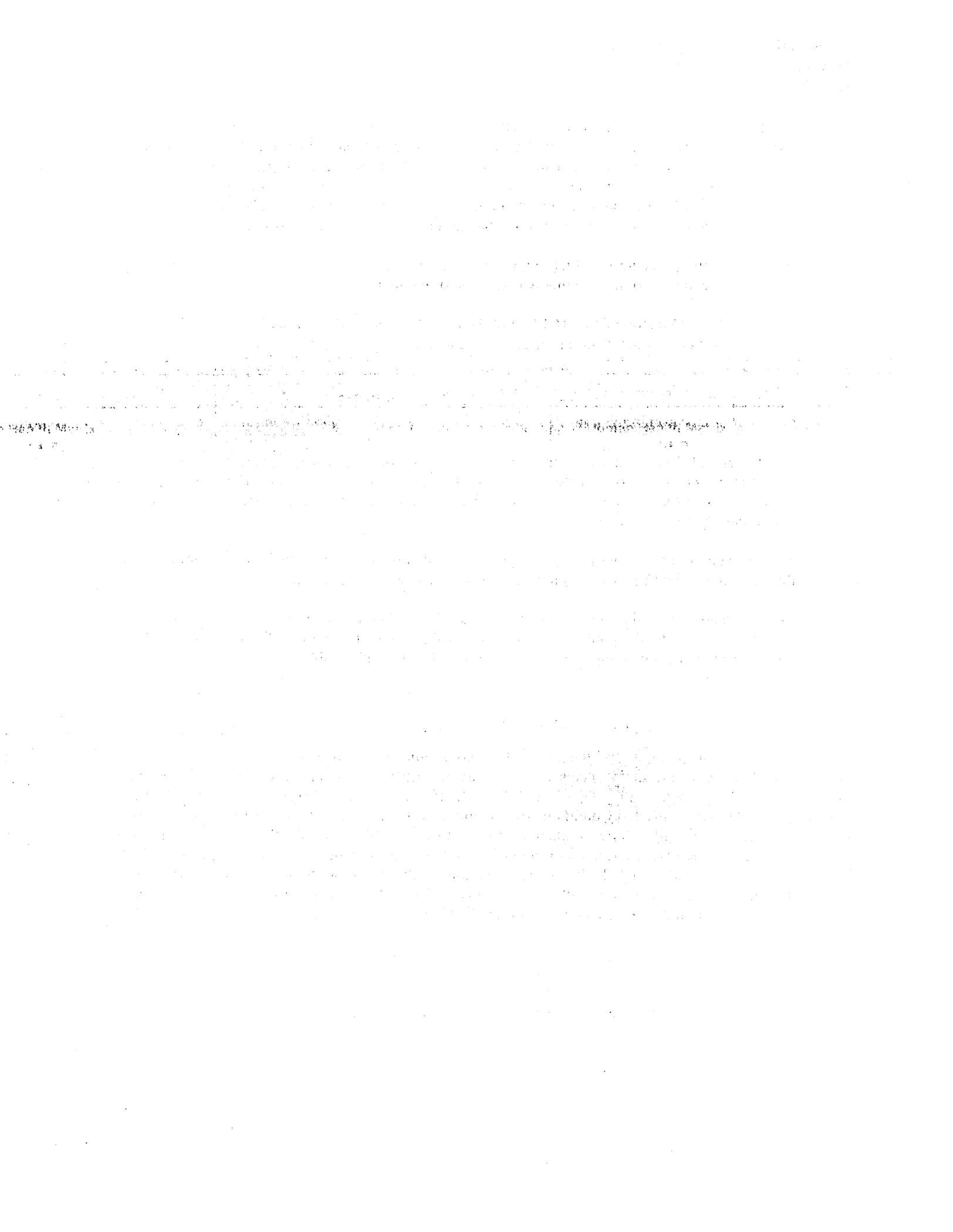
7. Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.
8. The Executive Director of the TCEQ and Transco have agreed on a settlement of the matters alleged in this enforcement action, subject to the approval of the Commission.
9. The Executive Director recognizes that on January 8, 2007, Transco submitted a complete Annual Compliance Certification Form for the period December 8, 2004 through December 7, 2005, and a revised semi-annual deviation report for the period January 1, 2006 through June 30, 2006.
10. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that Transco has not complied with one or more of the terms or conditions in this Agreed Order.
11. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.
12. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable.

II. ALLEGATIONS

As owner and operator of the Plant, Transco is alleged to have failed to properly report a deviation and failed to report the occurrence of that deviation in a semi-annual deviation report, in violation of 30 TEX. ADMIN. CODE §§ 122.143(4), 122.145(2)(A), 122.145(2)(B), 122.145(2)(C), Permit No. O-00668, Special Terms and Conditions (b)(2), and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during a records review conducted on November 13, 2006. Specifically, a deviation occurred on October 8, 2005 and was reported on the annual compliance certification form on December 30, 2005, however, the report failed to include the corrective action for the deviation. In the deviation report for the period December 8, 2005 to June 6, 2006 due on July 6, 2006, Transco failed to include the improper reporting of the violation that occurred on December 30, 2005, as a deviation.

III. DENIALS

Transco generally denies each allegation in Section II ("Allegations").



IV. ORDERING PROVISIONS

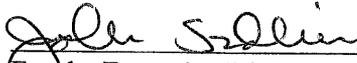
1. It is, therefore, ordered by the TCEQ that Transco pay an administrative penalty as set forth in Section I, Paragraph 6 above. The payment of this administrative penalty and Transco's compliance with all the terms and conditions set forth in this Agreed Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations, which are not raised here. Administrative penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: Transcontinental Gas Pipe Line Corporation, Docket No. 2007-0041-AIR-E" to:

Financial Administration Division, Revenues Section
Attention: Cashier's Office, MC 214
Texas Commission on Environmental Quality
P.O. Box 13088
Austin, Texas 78711-3088
2. The provisions of this Agreed Order shall apply to and be binding upon Transco. Transco is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Plant operations referenced in this Agreed Order.
3. This Agreed Order, issued by the Commission, shall not be admissible against Transco in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
4. This agreement may be executed in multiple counterparts, which together shall constitute a single original instrument. Any executed signature page to this Agreement may be transmitted by facsimile transmission to the other parties, which shall constitute an original signature for all purposes.
5. Under 30 TEX. ADMIN. CODE § 70.10(b), the effective date is the date of hand-delivery of the Order to Transco, or three days after the date on which the Commission mails notice of the Order to Transco, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission



For the Executive Director

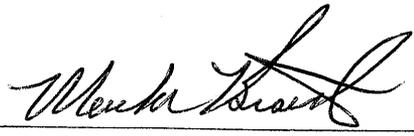
7/12/07
Date

I, the undersigned, have read and understand the attached Agreed Order. I am authorized to agree to the attached Agreed Order on behalf of the entity, if any, indicated below my signature, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I also understand that my failure to comply with the Ordering Provisions, if any, in this order and/or my failure to timely pay the penalty amount, may result in:

- A negative impact on my compliance history;
- Greater scrutiny of any permit applications submitted by me;
- Referral of this case to the Attorney General's Office for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions against me;
- Automatic referral to the Attorney General's Office of any future enforcement actions against me; and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.



Signature *mpw
ACU
TBW*

4-5-07
Date

Mark Bisett
Name (Printed or typed)
Authorized Representative of
Transcontinental Gas Pipe Line Corporation

Manager Environmental
Title Compliance

Instructions: Send the original, signed Agreed Order with penalty payment to the Financial Administration Division, Revenues Section at the address in Section IV, Paragraph 1 of this Agreed Order.

4-2-4

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Miss Mary E. ...
...

Miss ...