

7. 40 C.F.R. § 60.631 of Subpart KKK defines an “onshore natural gas processing plant” as “any processing site engaged in the extraction of natural gas liquids from field gas, fractionation of mixed natural gas liquids to gas products, or both.” 40 C.F.R. § 60.631.
8. 40 C.F.R. § 60.632(d) of Subpart KKK provides that “each owner or operator subject to the provisions of this subpart shall comply with the provisions of §§ 60.485.”
9. 40 C.F.R. §§ 60.485(b)(1) provides that to be in compliance, “Method 21 shall be used to determine the presence of leaking sources.”
10. 40 C.F.R. Part 60 Appendix A Method 21 § 8.3.1, provides that “If an increased meter reading is observed, slowly sample the interface where leakage is indicated until the maximum meter reading is obtained.”

RESPONDENT

11. Respondent is a Delaware corporation.
12. Respondent owns and operates the Casper Gas Plant.
13. Respondent is a “person” as defined in CAA § 302(3) 42 U.S.C. § 7602(e), and the federal and state regulations promulgated pursuant to the CAA.
14. Natural gas processing by the Respondent results in emissions of criteria pollutants to the outside air. Some of these emissions are from equipment leaks.
15. The Casper Gas Plant, located near Casper, Wyoming, is a “Natural Gas Processing Plant” subject to the requirements of the NSPS for Standards of Performance of Equipment Leaks for Onshore Natural Gas Processing Plants found at 40 C.F.R. Part 60, Subpart KKK.

FINDINGS

16. On August 23, 2011, the EPA staff inspected the Casper Gas Plant. The EPA has also reviewed records received.
17. During the inspection, the EPA staff monitored components subject to 40 C.F.R. Part 60, Subpart KKK using Toxic Vapor Analyzers and documented leaking components. The EPA staff found 3.27% of the components monitored to be leaking.
18. Records show that historic monitoring events at the Casper Gas Plant found less than 0.3% of the components leaking; often, no components were found to be leaking.
19. Leaks from the Casper Gas Plant are not being detected in accordance with Method 21. Because these leaks are not being detected, components are not being repaired in accordance with NSPS KKK resulting in excess emissions of Volatile Organic Compounds into the air.

ADMINISTRATIVE ORDER

20. Pursuant to section 113(a)(3)(B) of the CAA, 42 U.S.C. § 7413(a)(3)(B), EPA hereby issues the following order:
 - a. Effective immediately, whenever Method 21 is used to monitor for leaks at the Casper Gas Plant, Kinder Morgan shall comply with the Leak Detection and Repair requirements of 40 C.F.R. Part 60, specifically the requirements found in 40 C.F.R. Part 60 Appendix A Method 21 § 8.3.1 and find the maximum leaking rates of components.

ENFORCEMENT

21. Issuance of this Order does not preclude any other action by EPA to redress past or future violations of the CAA, including either of the following:
 - a. an administrative penalty complaint pursuant to section 113(d) of the CAA, 42 U.S.C. §7413(d), for penalties of not more than \$37,500 per day for each violation during the period the facility is not in compliance; or

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 8

Date: Sept. 29, 2011

By: 
Andrew M. Gaydosh
Assistant Regional Administrator
Office of Enforcement, Compliance and
Environmental Justice

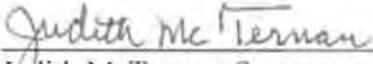
**In the Matter of:
Kinder Morgan, Inc.
Casper Gas Plant**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the original and one copy of the ADMINISTRATIVE ORDER were hand-carried to the Regional Hearing Clerk, EPA Region 8, 1595 Wynkoop Street; Denver, Colorado 80202-1129, and that a true copy of the same was sent via Certified Mail, Postage Pre-Paid, to

**Kinder Morgan, Inc.
370 Van Gordon Street
Lakewood, CO 80228**

on the 29th day of September 2011.



Judith McTernan, Secretary