

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 8

2011 SEP 29 AM 11:09

In the Matter of:)

El Paso Corporation)
Rawlins Compressor Station)
3401 Wagon Circle Road)
Rawlins, WY 82301)

Respondent)

FILED
EPA REGION 8
ADMINISTRATIVE ORDER
SEP 29 2011

Docket No. CAA-08-2011-0029

AUTHORITY

This Administrative Order ("Order") is issued by the United States Environmental Protection Agency, Region 8 ("EPA") to El Paso Corporation ("El Paso") pursuant to § 113(a)(3)(B) of the Clean Air Act ("CAA"), 42 U.S.C. § 7413(a)(3)(B), for violations of § 112 of the CAA, 42 U.S.C. § 7412. The authority to issue this Order has been properly delegated to the Assistant Regional Administrator, Office of Enforcement, Compliance, and Environmental Justice, EPA Region 8.

REGULATORY BACKGROUND

1. Congress has enacted CAA § 112 to require the EPA to regulate sources of hazardous air pollutants (HAPs) and to establish National Emission Standards for Hazardous Air Pollutants (NESHAPs). 42 U.S.C. § 7412.
2. The EPA has designated Oil and Natural Gas Production Facilities as a category subject to the requirements of CAA § 112.
3. Pursuant to CAA § 112(c)(1), 42 U.S.C. § 7412(c)(1), the EPA is required to publish a list of all categories and subcategories of major sources and area sources of HAPs.

4. On June 17, 1999, the EPA promulgated 40 C.F.R. Part 63, Subpart HH, "National Emissions Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities." 64 Fed. Reg. 32628.
5. 40 C.F.R. Part 63 Subpart HH applies to owners and/or operators of oil and natural gas production plants. 40 C.F.R. § 63.760(a).
6. 40 C.F.R. § 63.761 of Subpart HH defines a "natural gas production plant" as "any processing site engaged in the extraction of natural gas liquids from field gas, or the fractionation of mixed NGL to natural gas products, or both." 40 C.F.R. § 63.761.
7. 40 C.F.R. § 63.769(c) of Subpart HH states that "ancillary equipment and each compressor in this section... shall meet the requirements specified in 40 C.F.R. part 61, subpart V..."
8. 40 C.F.R. §§ 61.245(b)(1) provides that "Monitoring shall comply with Method 21 of appendix A of 40 C.F.R part 60."
9. 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

10. Respondent is a Delaware corporation.
11. Respondent owns and operates the Rawlins Compressor Station.
12. Respondent is a "person" as defined in CAA § 302(e), 42 U.S.C. § 7602(e), and the federal and state regulations promulgated pursuant to the CAA.
12. Natural gas processing by the Respondent results in emissions of criteria pollutants to the outside air. Some of these emissions are from equipment leaks.

13. The Rawlins Compressor Station located in Rawlins, Wyoming, is a “Natural Gas Processing Plant” subject to the requirements of National Emissions Standards for Hazardous Air Pollutants from Oil and Natural Gas production Facilities found at 40 C.F.R. Part 63, Subpart HH.

FINDINGS

14. On August 24, 2011, the EPA staff inspected the Rawlins Compressor Station. The EPA has also reviewed records received.
15. During the inspection, the EPA staff monitored components subject to 40 C.F.R. Part 63, Subpart HH using Toxic Vapor Analyzers and documented leaking components. The EPA staff found 3.5% of the components monitored to be leaking.
16. Records show that historic monitoring events at the Rawlins Compressor Station found less than 1% of the components leaking; often, no components were found to be leaking.
17. Leaks from the Rawlins Compressor Station are not being detected in accordance with Method 21. Because these leaks are not being detected, components are not being repaired in accordance with 40 C.F.R. Part 63, Subpart HH resulting in excess emissions of Hazardous Air Pollutants into the air.

ADMINISTRATIVE ORDER

18. 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 Rawlins Compressor Station, EL Paso shall comply with the Leak Detection and Repair requirements of 40 C.F.R. Part 63, 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

19. 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
 - b. a civil action pursuant to §113(b) of the CAA, 42 U.S.C. §7413(b), for injunctive relief or civil penalties of not more than \$32,500 per day for each violation effective after March 15, 2004 through January 12, 2009 (\$37,500 after January 12, 2009 per day for each violation) during the period the facility is not in compliance, or both.
20. Pursuant to section 120 of the CAA, 42 U.S.C. §7420, EPA is also authorized to assess noncompliance penalties aimed at recovering the economic benefit which any person received by not complying with the CAA.
21. Pursuant to section 113(a)(3) of the CAA, 42 U.S.C. §7413(a)(3), failure to comply with this Order may lead to a civil action to obtain compliance or an action for civil or criminal penalties.

OPPORTUNITY FOR CONFERENCE

22. In accordance with section 113(a)(4) of the CAA, 42 U.S.C. §7413(a)(4), EPA is offering El Paso an opportunity for a conference to discuss the Order. The request for such a conference must be made no later than thirty (30) calendar days from the date El Paso receives this Order. If you wish to make arrangements for a conference, please contact David Rochlin, Enforcement Attorney, U.S. EPA Region 8, 1595 Wynkoop Street, Denver, CO 80202-1129. Mr. Rochlin's telephone number is (303) 312-6892. By offering the opportunity for a conference or

participating in one, EPA does not waive or limit its right to any remedy available under the CAA.

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 8

Date: 9/29/2011

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

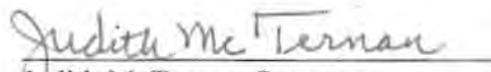
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CERTIFICATE OF SERVICE

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

**El Paso Corporation
Rawlins Compressor Station
3401 Wagon Circle Road
Rawlins, WY 82301**

on the 29th day of September 2011.



Judith McTernan, Secretary