



# Department of Environmental Quality



To protect, conserve and enhance the quality of Wyoming's environment for the benefit of current and future generations.

Dave Freudenthal, Governor

John Corra, Director

August 16, 2007

Mr. Matthew J. Mask  
Colorado Interstate Gas Company  
P.O. Box 1087  
Colorado Springs, CO 80944

Dear Mr. Mask,

Enclosed you will find a Notice of Violation (NOV) issued to Colorado Interstate Gas Company by the Department of Environmental Quality, Air Quality Division, for the violation of the requirement to obtain a operating permit for the Sinclair Products Meter Station located in Carbon County, Wyoming. The Air Quality Division's review of the Sinclair Products Meter Station's emissions indicates that the facility is a major source and would require an operating permit.

As the Department and this Division consider the failure to obtain the necessary permits prior to operating air emission sources to be a serious matter, I am recommending that the Department refer this violation to the State Attorney General's office requesting a suit be filed in District Court to recover appropriate penalties. If you would like to discuss settlement of this Notice of Violation prior to action on the referral by the Attorney General's office, please contact Ms. Karen Godman, Air Quality Compliance Program Principal, at 307-777-8601 no later than ten (10) days after receipt of this letter.

Sincerely,

David A. Finley  
Administrator  
Air Quality Division

cc: Robert Gill  
Nancy Vehr  
Chris Hanify  
Keith Guille



**BEFORE THE  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
STATE OF WYOMING**

**IN THE MATTER OF THE NOTICE OF VIOLATION )  
ISSUED TO COLORADO INTERSTATE GAS COMPANY, )  
MR. MATTHEW J. MASK, )  
PO BOX 1087, )  
COLORADO SPRINGS, CO 80944 )**

**DOCKET NO. 4133-07**

**NOTICE OF VIOLATION**

**NOTICE IS HEREBY GIVEN THAT:**

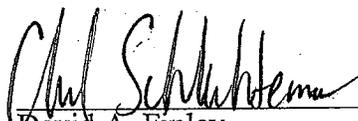
1. The Department of Environmental Quality, Air Quality Division, has found Colorado Interstate Gas (CIG) Company to be in violation of permitting requirements as dictated through W.S. 35-11-203 through W.S. 35-11-206 of the Wyoming Environmental Quality Act and Chapter 6, Section 3 of the Wyoming Air Quality Standards and Regulations in the operation of the Sinclair Products Meter Station located in Carbon County, Wyoming.
2. W.S. 35-11-203 through W.S. 35-11-206 establishes the state operating permit program for major sources to include, sources subject to the operating permit program, procedures for applying for an operating permit, review of permit applications and issuance of such permits.
3. Chapter 6, Section 3 of the Wyoming Air Quality Standards and Regulations prescribes the applicability and procedures for issuing permits to major sources under Wyoming's operating permit program.
4. Chapter 6, Section 3(c)(i)(D)(II) of the Wyoming Air Quality Standards and Regulations states: "Permit applications for all other operating sources subject to this section [sources other than compressor engines, natural gas sweetening plants, and natural gas processing plants] shall be submitted within twelve (12) months of the EPA's approval of this operating permit program, but no later than November 15, 1995."
5. Further explained, Chapter 6, Section 3(d)(ii) of the Wyoming Air Quality Standards and Regulations states: "Except as provided in this paragraph or in Chapter 6, Section 3(d)(iii), no source requiring an operating permit under Chapter 6, Section 3 may operate after the time that it is required to submit a timely and complete application, except in compliance with a permit issued under this section..."
6. Colorado Interstate Gas Company's Sinclair Products Meter Station is located 3.5 miles north of CIG's Rawlins Natural Gasoline Plant. This station consists of a railloading facility where propane, butane and Natural Gas Liquids (NGLs) produced by the Rawlins Plant, are loaded onto railcars for shipment. An installed flare was used as a control and safety device for propane and butane loading, but was discovered not to have been used for the NGL loading, thus emissions from the NGLs loading were being vented directly to the atmosphere. Additionally, the railcars were depressurized with emissions vented to the atmosphere prior to the railcar loading operations. The Air Quality Division's review of the Sinclair Products Meter Station emissions indicates that the facility had potential emissions which exceeded the major source threshold and required an operating permit. CIG has never submitted an operating permit application for this facility.
7. Said violation consists of operating a major source without obtaining the appropriate operating permit in violation of W.S. 35-11-203 through W.S. 35-11-206 of the Wyoming Environmental Quality Act and Chapter 6, Section 3 of the Wyoming Air Quality Standards and Regulations.

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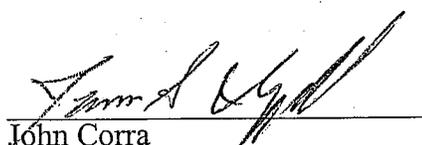
8. Any person who violates any provision of Article 2 of [the Environmental Quality Act] ... or any rule, regulation, standard or permit adopted pursuant to those provisions, or who violates any determination or order of the council pursuant to Article 2 of [the Environmental Quality Act] ... is subject to a penalty not to exceed ten thousand dollars (\$10,000.00) for each violation for each day during which the violation continues, a temporary or permanent injunction, or both a penalty and an injunction.

9. This notice is being sent to you pursuant to W.S. 35-11-701(c), which requires that, in any case of the failure to correct or remedy an alleged violation, the Director of the Department of Environmental Quality shall cause a written notice to be issued and served upon the person alleged to be responsible.

DATED this 17<sup>th</sup> day of August, 2007.



David A. Finley  
Administrator  
Air Quality Division



John Corra  
Director  
Department of Environmental Quality

Please direct all inquiries to David A. Finley, Administrator, Air Quality Division, Department of Environmental Quality, Herschler Building, 2nd Floor, 122 W. 25th Street, Cheyenne, Wyoming 82002. (Telephone: 307/777-7393)