



Department of Environmental Quality

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



Matthew H. Mead, Governor

Todd Parfitt, Director

January 22, 2013

Mr. Bubba Smith
Field Manager
Amble Pipeline & Gathering, LLC
65 North Main Street
Buffalo, WY 82834

RE: Notice of Violation

Dear Mr. Smith:

Enclosed you will find a Notice of Violation (NOV) issued to Amble Pipeline & Gathering, LLC by the Department of Environmental Quality, Air Quality Division, to the Crump Compressor Station for: 1) installing unpermitted engines, 2) failing to conduct initial performance tests of engines, 3) failing to conduct annual performance tests of engines and 4) failing to install a device to measure pressure drop across the catalyst, collect measurements and maintain records as required. These violations were observed by Mr. Brad Steidley and Mr. Dorran Larner on July 26, 2012.

As the Department and this Division consider the failure to comply with air quality permit conditions to be a serious matter, I am considering recommending 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 referral to 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.

Should you have any questions or comments regarding this matter, please feel free to contact me or Ms. Karen Godman.

Sincerely,

Steven A. Dietrich
Administrator
Air Quality Division

cc: Robert Gill
Tanner Shatto
Nancy Vehr
Keith Guille



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

IN THE MATTER OF THE NOTICE OF VIOLATION)	
ISSUED TO AMBLE PIPELINE & GATHERING, LLC)	DOCKET NO. 5113-13
MR. BUBBA SMITH,)	
FIELD MANAGER)	
65 NORTH MAIN STREET)	
BUFFALO, WY 82834)	

NOTICE OF VIOLATION

NOTICE IS HEREBY GIVEN THAT:

1. The Department of Environmental Quality, Division of Air Quality, has found Amble Pipeline & Gathering, LLC to be in violation of permit MD-1198 issued in accordance with W.S. 35-11-801 of the Wyoming Environmental Quality Act and Chapter 6, Section 2 of the Wyoming Air Quality Standards and Regulations at the Crump Compressor Station located in Campbell County, Wyoming.

2. W.S. 35-11-801(a) states, "In granting permits, the Director may impose such conditions as may be necessary to accomplish the purpose of this act which are not inconsistent with the existing rules, regulations and standards."

3. Chapter 6, Section 2 of the Wyoming Air Quality Standards and Regulations prescribes the applicability and procedures for issuing permits to sources under Wyoming's construction and modification permitting program.

4. Chapter 6, Section 2(a)(i) of the Wyoming Air Quality Standards and Regulations states, "Any person who plans to construct any new facility or source, modify any existing facility or source, or to engage in the use of which may cause the issuance of or an increase in the issuance of air contaminants into the air of this state shall obtain a construction permit from the State of Wyoming, Department of Environmental Quality, before any actual work is begun on the facility."

5. Permit MD-1198 was issued to Amble Pipeline & Gathering, LLC on August 1, 2005. Condition 11 limits the engine configuration as follows:

Condition 11 states:

"That the engine configuration for the Crump Compressor Station shall be limited to two (2) engines consisting of the following:

E1-E2: Caterpillar G3516LE engines equipped with an oxidation catalyst, Caterpillar G3512LE engines equipped with an oxidation catalyst, Caterpillar G3412LE engines equipped with an oxidation catalyst, Caterpillar G398TA engines equipped with an AFRC and a NSCR catalyst, Caterpillar 3408TA engines equipped with an AFRC and a NSCR catalyst or Caterpillar G3406TA engines equipped with an AFRC and a NSCR catalyst.

Once constructed, units E1-E2 lose their flexibility and cannot be replaced by a different model engine unless authorized by an appropriate permit modification."

6. On July 26, 2012, Mr. Brad Steidley and Mr. Dorran Larner Air Quality Division Engineers/Inspectors, conducted an inspection of the Crump Compressor Station. At that time, they observed a Caterpillar G3516LE engine (4EK-04115) operating at the facility. A review of Division records and supplemental information from the company indicates additional engines had been installed and removed to include an additional Caterpillar 3408LE engine, Caterpillar 3512 engine and Caterpillar 3516 engine. Review indicates that notifications of engine removals and/or installations were not received for these engines. These are violations of condition 11 of permit MD-1198.

7. Permit MD-1198 was issued to Amble Pipeline & Gathering, LLC on August 1, 2005. Condition 8 requires initial testing of engines as follows:

Condition 8 states:

“That performance tests be conducted, in accordance with Chapter 6, Section 2(j) of the WAQSR, within 30 days of achieving a maximum design rate but not later than 90 days following initial start-up, and a written report of the results be submitted...”

8. On July 26, 2012, Mr. Brad Steidley and Mr. Dorran Larner Air Quality Division Engineers/Inspectors, conducted an inspection of the Crump Compressor Station. At that time, they observed a Caterpillar G3516LE engine (4EK-04115) operating at the facility. A review of Division records and supplemental information from the company indicates additional engines had been installed and removed to include an additional Caterpillar 3408LE engine, Caterpillar 3512 engine and Caterpillar 3516 engine. Review indicates that initial testing of engines had not been conducted or received. These are violations of condition 8 of permit MD-1198.

9. Permit MD-1198 was issued to Amble Pipeline & Gathering, LLC on August 1, 2005. Condition 12 requires annual testing of engines as follows:

Condition 12 states:

“That annually, the engines shall be tested to verify compliance with the NO_x and CO limits set forth in this permit. The first annual test is required the following calendar year after completion of the initial performance test...”

10. On July 26, 2012, Mr. Brad Steidley and Mr. Dorran Larner Air Quality Division Engineers/Inspectors, conducted an inspection of the Crump Compressor Station. At that time, they observed a Caterpillar G3516LE engine (4EK-04115) operating at the facility. A review of Division records indicates that annual testing of the engines had not been conducted or received for 2006, 2007, 2008 and 2010. This is a violation of condition 12 of permit MD-1198.

11. Permit MD-1198 was issued to Amble Pipeline & Gathering, LLC on August 1, 2005. Conditions 13 iii. & iv. requires installation of a catalyst pressure drop device, monitoring and recording of engines as follows:

Condition 13 iii. & iv. states:

“Install a device to measure the pressure drop across the catalyst... The pressure drop across the catalyst shall be recorded at least monthly... Records of catalyst inlet temperature, pressure drop, and any maintenance or corrective actions shall be kept and maintained for a period of five (5) years and shall be made available to the Division upon request.

12. On July 26, 2012, Mr. Brad Steidley and Mr. Dorran Larner Air Quality Division Engineers/Inspectors, conducted an inspection of the Crump Compressor Station. During the inspection and subsequent record review it was noted that the device to measure the pressure drop across the catalyst had not been installed, no measurements had been collected or maintained. These are violations of condition 13 of permit MD-1198.

13. Said violation consists of: 1) installing unpermitted engines, 2) failing to conduct initial performance tests of engines, 3) failing to conduct annual performance tests of engines and 4) failing to install a device to measure pressure drop across the catalyst, collect measurements and maintain records as required.

14. Under W.S. 35-11-901(a), 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.

15. 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 22nd day of JANUARY, 2013.



Steven A. Dietrich
Administrator
Air Quality Division



Todd Parfitt
Director
Department of Environmental Quality

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