

Navajo Nation Environmental Protection Agency

Navajo Nation Operating Permit Program



Route 112 North/Bldg. 2837
Fort Defiance, AZ 86504
FAX: (928) 729-4313
Phone: (928) 729-4096





Our Mission



To protect and enhance the health and livelihood of Navajo people



To protect and preserve the natural beauty and environment on the Navajo Nation



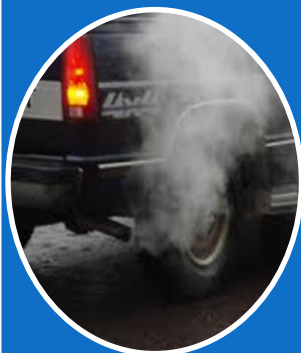
To ensure the air emissions from the industries operating on the Navajo Nation are regulated



Clean Air Act Amendments 1990



Title I
Air Pollution
and Control



Title II
Emission
Standards for
Moving
Sources



Title III
General



Title IV
Acid
Deposition
Control



Title V
Permits



Title VI
Stratospheric
Ozone
Protection

Clean Air Act, USC Title 42 Chapter 85



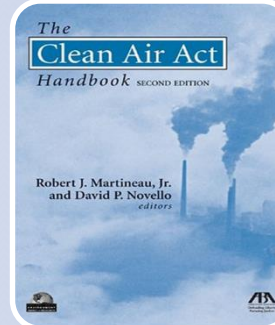
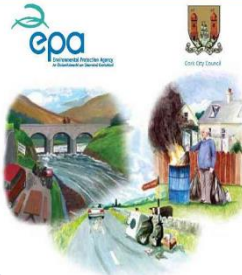
Program Responsibilities



THE PROOF IS IN THE PERMIT
How to Make Sure a Facility in Your Community Gets an Effective Title V Air Pollution Permit



SEE SOMETHING? SAY SOMETHING



Issuance of Title V Permits to large industrial facilities on the Navajo Nation

Compliance and Enforcement Inspections at Title V permitted facilities

Address Title V Citizen Complaints

Establish and Maintain an Emissions Inventory

Study new proposed federal regulations to enhance and amend the Navajo Air Pollution Control and Prevention Act

Outreach and Education Activities



Operating Permit Program



- On April 24, 2004, the Navajo Nation Council enacted the Navajo Air Pollution Prevention and Control Act.
- The Act created a program to control current and future sources of air pollution on the Navajo Nation.
- October 2004 and March 2006, USEPA approved a Clean Air Act program for the NNEPA to administer a Title V Operating Permit Program (Part 71 Permit Program)
- The Program issues Title V permits to the major sources on the Navajo Nation



Operating Permit Program

- Federal Operating Permit Program - Part 71
- Treatment as a State – Delegation
- Part 71 Fees [40 CFR 71.9(b)]:
 - NNEPA collects permit fees from all Part 71 Sources and the fees will be used **solely for the purpose of implementing the Part 71 Program**
 - Owners/operators pay an annual fee for the previous calendar year based on their emissions (\$/ton)- the rate changes yearly



Title V Permit

- A Title V permit grants a source permission to operate. Includes all air pollution requirements that apply to the source, emissions limits, monitoring, record keeping, and reporting requirements.
- Major Source Threshold in Attainment Areas

Pollutant	Potential to Emit (tons/year)
VOC, NO _x , SO _x , CO, PM ₁₀	100
Single HAP	10
Combination of HAPs	25



Permit Process



Title V Permit Application



Draft Title V Permit



30 Day Public Notice



Response to Comments



Final Permit Issuance

Title V Sources on the Navajo Nation – 14 major sources

- Navajo Generating Station
- Four Corners Power Plant
- Peabody Coal Mine – Kayenta Complex
- Transwestern Pipeline – Leupp Compressor Station
- El Paso Natural Gas Compressor Stations
 - White Rock
 - Gallup
 - Window Rock
 - Navajo
 - Dilkon
 - Leupp
- Western Refinery – Gallup Unit (Candle Stick Flare)
- Preferred Sands of Arizona – Sanders Facility
- Elk Operating Services – Aneth Unit
- Elk Operating Services – Mc Elmo Creek Unit



FOUR CORNERS

**NAVAJO
GENERATING STATION**



Peabody Western Coal Company





Natural Gas Compression and Transmission



Characteristic of an effective Title V permit



Clearly identify the requirements that apply to the facility



Requires the facility to perform monitoring to assure the public that facility is in compliance



Provide the public with the ability to enforce permit conditions



Permit term

- Permits are renewed every 5 years, the facility will operate under a permit shield until a new permit is issued
- The source must abide by the terms and conditions of the permit – documents must be certified as true and accurate (Certified Responsible Official)
- Submit monitoring and recordkeeping to ensure compliance
- Perform routine maintenance and testing requirements set forth in the permit
- If laws change and additional requirements under the CAA become applicable, the source must comply with the new regulations and apply for permit modification

Permit Term: Compliance

- Annual Compliance Inspections
 - NNEPA AQCP-OPP has the right to inspect at any time
 - The source must keep 5 years of records on site
 - Inspection Process
 - Records Review (full 5 year)
 - Check Emission Calculations
 - Inspect all units at the facility
 - Observe any emission testing





Community Outreach and Education

**Navajo Nation Environmental Protection Agency
Operating Permit Program**

Title V Facilities Regulated By NNEPA

Submitting A Public Comment
Navajo Nation Environmental Protection Agency
Operating Permit Program

Public Review and Comment Procedure
One of the key features of the Title V permits is the opportunity for the public to comment. The draft permit is up for public comments for a minimum of 30 days. During this period, anyone can request for additional time to comment or for a public hearing.

Comment Guidelines

Describe the problem	Identify the rule that governs the issue
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NNEPA Response to Comments

- Prepare responses to all comments
- Justify the changes made to the permit
- Legal review of responses
- Final Permit Package

**El Paso Natural Gas a Kinder Morgan Company
Transmission Lines on the Navajo Nation**

El Paso Natural Gas has six compressor stations on the Navajo Nation:

- White Rock
- Gallop
- Window Rock
- Navajo
- Dilbon
- Leupp

Role of the Public

- Become knowledgeable
- Participate during the public review process
- Notify the permit facility
- Ask questions, request for information
- Request for:
 - Navajo Air
 - Copies of final permit
 - General information
 - Attend an open house
- Submit comments

Gas travels through the Transmission lines and enters at low pressure

Scrubbers clean out any impurities in gas

Gas travels through a compressor increasing the pressure and temperature of the gas

The gas is then cooled by a series of cooling towers

Then sent along the pipeline to the next station. On the Navajo Nation there is a total of 900 mi of pipeline.

Continuous Emission Monitoring Systems (CEMS): A monitor that continuously collects, records and reports emissions.

Relative Accuracy Testing Audit: Testing that is performed yearly to determine if the emissions being reported by CEMS is accurate. An outside company is brought in to test the accuracy of the CEMS.

Stack testing: Stack testing is performed every permit term to determine if the emission factors being used for emission reports are accurate.

Limiting operating hours: Hours of operation will sometimes be enforced on certain equipment to limit total emissions. For example at the Leupp station AUX-D-01 can only operate 100 hrs/yr.

Total GHG Emissions (TPE)

Year	2006	2007	2008	2009	2010
CO ₂ (MMBtu)	10,000	10,000	10,000	10,000	10,000
CH ₄ (MMBtu)	10,000	10,000	10,000	10,000	10,000
N ₂ O (MMBtu)	10,000	10,000	10,000	10,000	10,000
Other (MMBtu)	10,000	10,000	10,000	10,000	10,000

Green House Gas Inventory: Facilities that emit more than 25,000 metric tons of Green House Gas (GHG) must report to USEPA. NNEPA/OPF has requested that all Title V facilities operating on the nation maintain and report GHG Emissions to NNEPA as well.

Pigging
Pigging is a device that ensure the pipeline is running smoothly. It is a maintenance tool that can be used to clean the pipeline and inspect the line. This is performed yearly and sometimes quarterly. A smart pig is used about every five years. The smart pig is a more sophisticated version and it gathers information about the pipeline such as temperature and pressure. It can detect if there is a corrosion occurring or if there is any metal loss.

- Permit Renewals – Chapter Outreach for each affected community
- Issue public notices in newspapers – focus on what newspapers the community reads
- Respond to comments and issue final permit
- If there is a complaint we try to work with the community and facility to resolve the issue



Thank You!!