

SOUTHERN UTE INDIAN TRIBE MINOR SOURCE PROGRAM AND 2017 EMISSION INVENTORY

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WHAT WILL WE DISCUSS TODAY?

- Background of Southern Ute Indian Tribe's Air Quality Program
- How minor sources of air pollution are currently regulated on the Reservation
- What the Tribe is proposing to do regarding minor sources of air pollution
- Why the Tribe is seeking to change the way minor sources are regulated on the Reservation
- What the emission contributions from different source categories on the Reservation are
- Oil and gas emission trends from 2015 to 2017 on the Reservation

BACKGROUND

- Intergovernmental Agreement Between the Southern Ute Indian Tribe and the State of Colorado Concerning Air Quality Control on the Southern Ute Indian Reservation (IGA)
 - Southern Ute Indian Tribe/State of Colorado Environmental Commission (Commission)
 - Southern Ute Indian Tribe Air Quality Program (AQP)
 - Full delegation of the Part 70 Title V Operating Permit Program for all sources located within Reservation boundaries
 - Permit 35 Title V sources
 - Mostly oil and gas sources

HOW ARE MINOR SOURCES OF AIR POLLUTION CURRENTLY REGULATED ON THE RESERVATION?

- EPA currently regulates minor sources on the Reservation
 - Federal Implementation Plan for Managing Air Emissions from True Minor Sources in Indian Country in the Oil and Natural Gas Production and Natural Gas Processing Segments of the Oil and Natural Gas Sector (FIP)
 - Federal Minor New Source Review Program in Indian Country

WHAT IS THE TRIBE PROPOSING TO DO?

- The Commission has recommended that the Tribe apply for administrative delegation of the federal minor source programs
- This would make the Tribe the permitting and compliance authority for minor sources of air pollution in addition to Title V sources located within the Reservation's exterior boundaries

WHEN IS THE TRIBE PLANNING ON SUBMITTING THE APPLICATION FOR ADMINISTRATIVE DELEGATION?

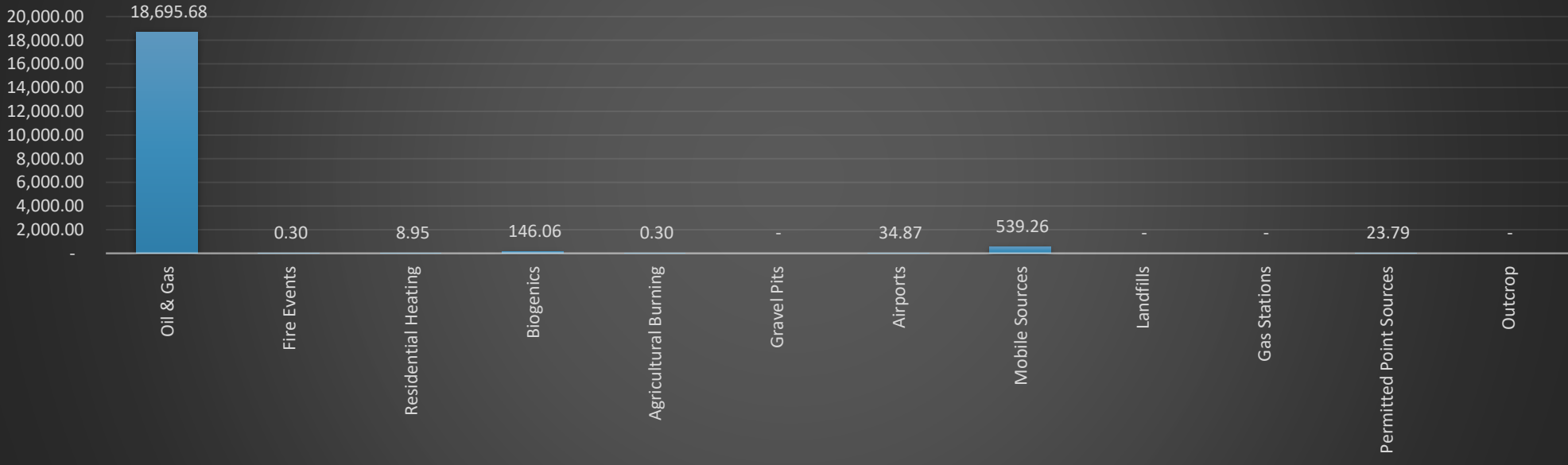
- AQP has a draft application requesting administrative delegation of the federal minor source programs and plans to submit it in fiscal year 2020
- EPA will then have to review and approve
- Memorandum of Understanding regarding enforcement will have to be developed before implementation of the programs

WHY IS THE TRIBE SEEKING DELEGATION OF THE FEDERAL MINOR SOURCE PROGRAMS?

- Establishes the Tribe as the single air permitting agency on the Reservation
- Reduces confusion for Reservation operators
- Increased compliance presence by the AQP
 - EPA inspects the 6 largest of the 300+ minor sources within the Reservation boundaries once every five years
 - AQP will inspect all of the minor sources within the Reservation boundaries
- Ozone concentrations on the Reservation are nearing the NAAQS standard

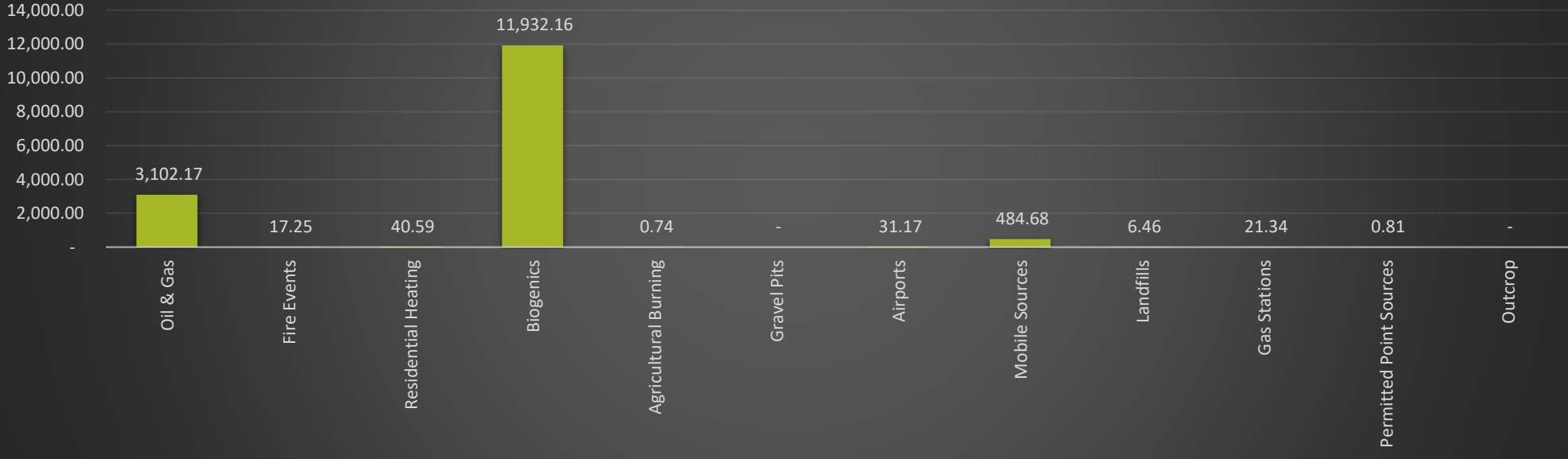
WHAT ARE THE EMISSIONS CONTRIBUTIONS FROM DIFFERENT SOURCE CATEGORIES ON THE RESERVATION?

NOx Emissions on the Southern Ute Indian Reservation by Source Category - 2017 (tons)



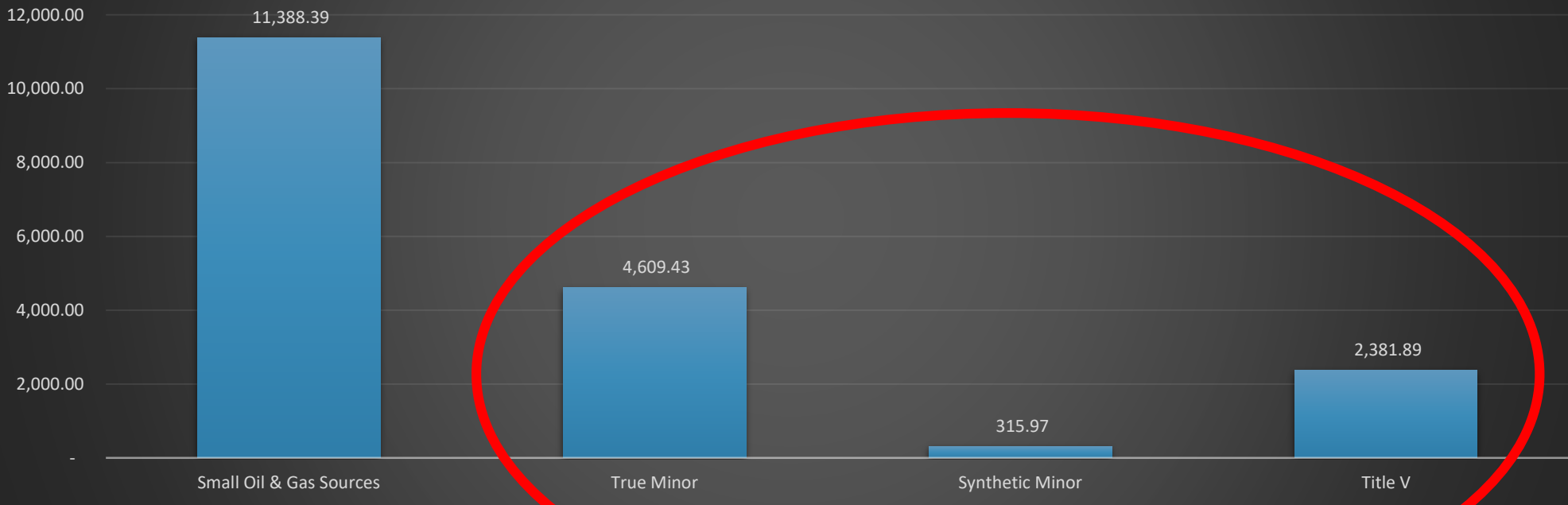
WHAT ARE THE EMISSIONS CONTRIBUTIONS FROM DIFFERENT SOURCE CATEGORIES ON THE RESERVATION?

VOC Emissions on the Southern Ute Indian Reservation by Source Category (tons)



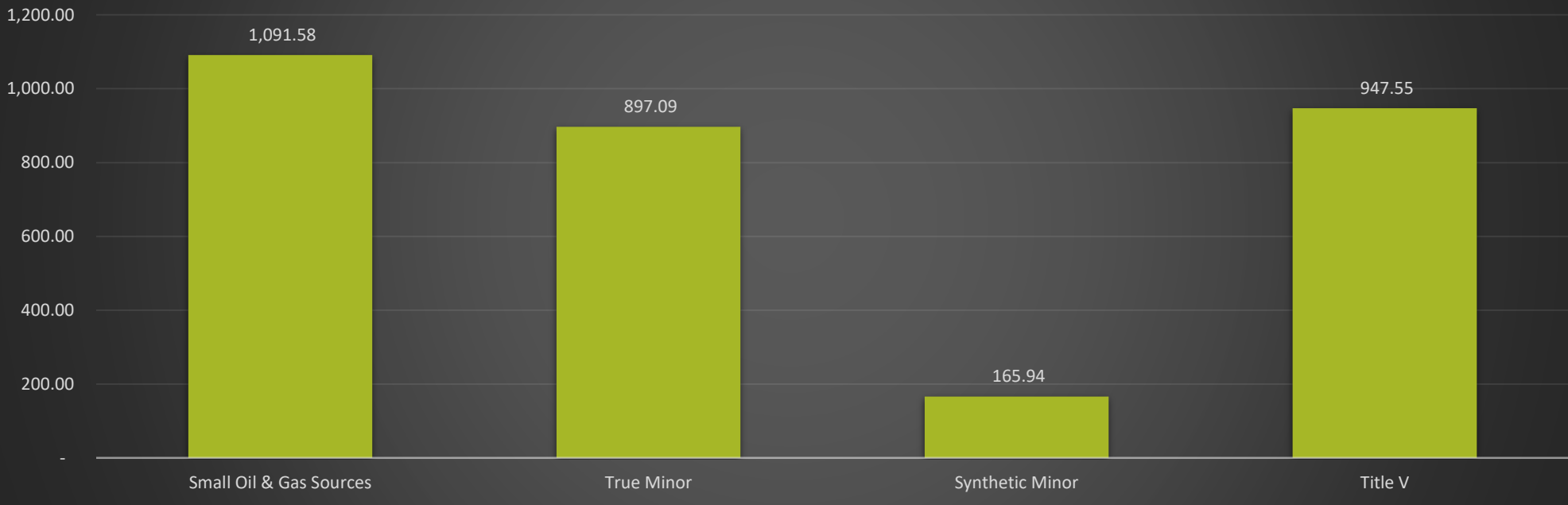
OIL AND GAS SOURCE EMISSIONS

Oil and Gas NOx Emissions by Source Category - 2017 (tons)



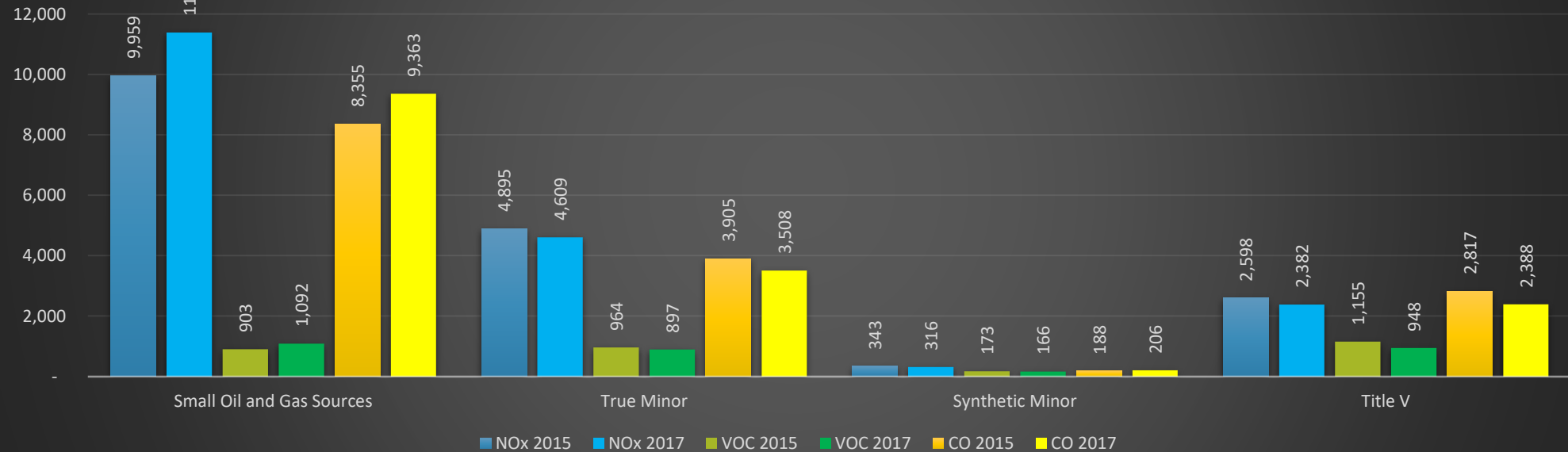
OIL AND GAS SOURCE EMISSIONS

Oil and Gas VOC Emissions by Source Category - 2017 (tons)



OIL AND GAS SOURCE EMISSION TRENDS 2015 - 2017

Oil and Gas NO_x, VOC, and CO Emission Comparison Between SUIT 2015 and 2017 EI
(tons)





QUESTIONS?