



# Southern Ute Indian Tribe Air Quality Program

Environmental Programs Division
Air Quality Program
Presented by: Chris Ellis and Danny Powers
November 10, 2015

### Air Quality Program Overview

Buckskin Charlie - Jeremy Wade Shockley/Southern Lite Drum

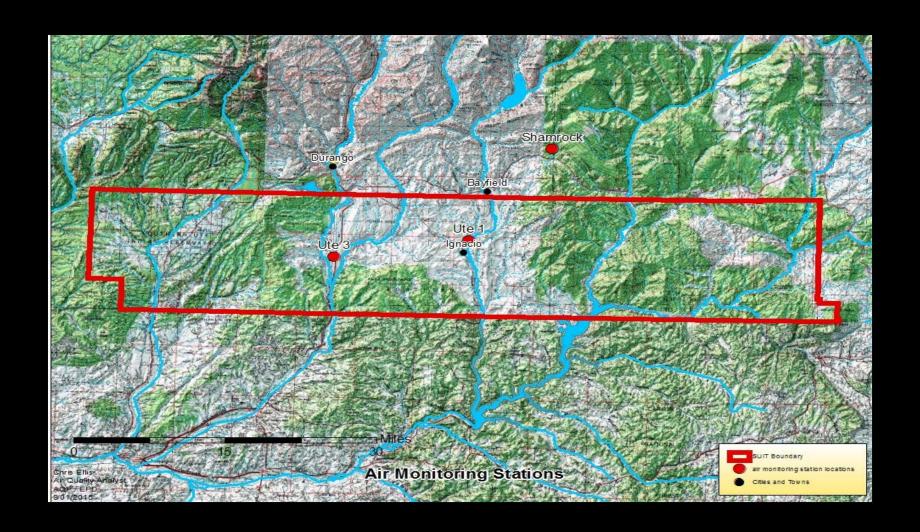
Ambient Air Quality Monitoring

Air Quality Management

#### Air Quality Monitoring

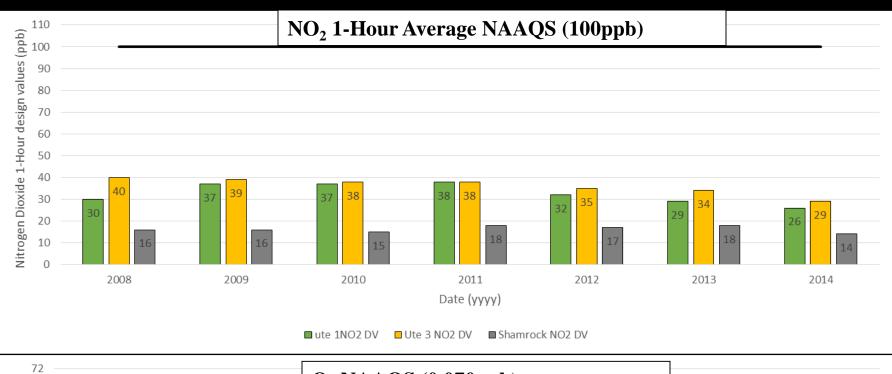
- Two ambient air monitoring stations
  Ute 1 and Ute 3
- Monitor for the following gaseous pollutants
  Ozone, Nitrogen Dioxide, and Carbon Monoxide
- PM2.5 monitoring
- Meteorological Monitoring
  - WS, WD, RH, ambient temp., solar radiation, precipitation

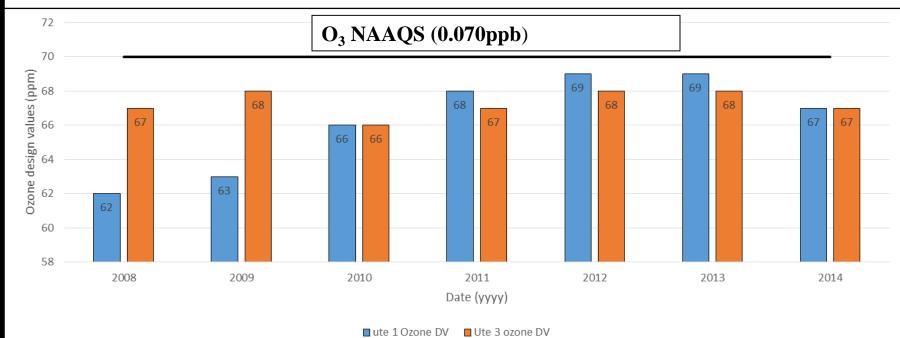
#### **Ambient Air Monitoring Station Locations**

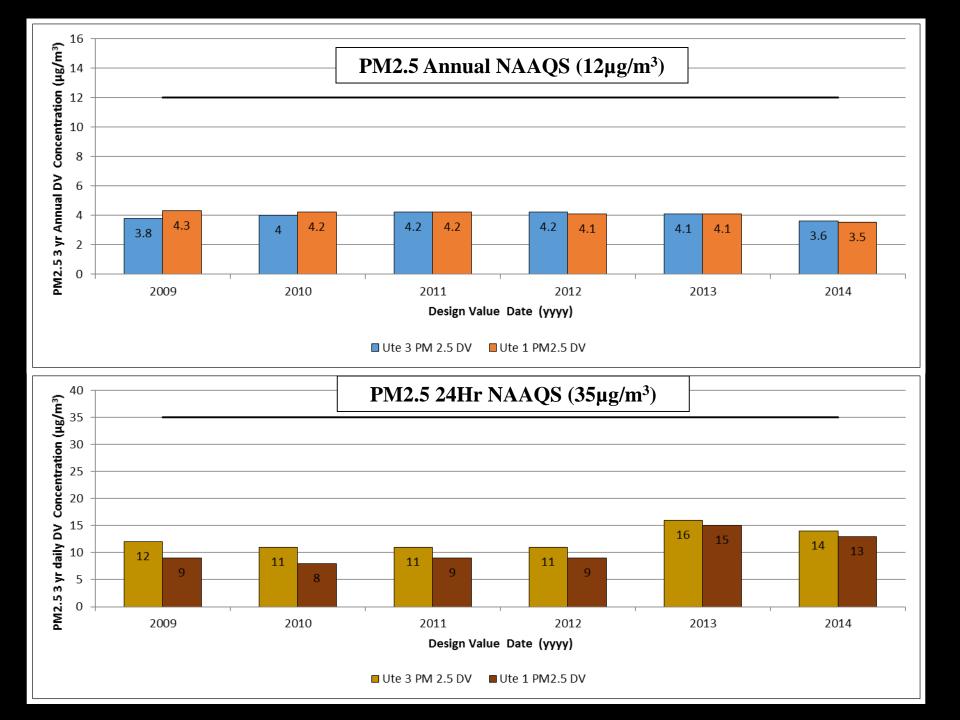


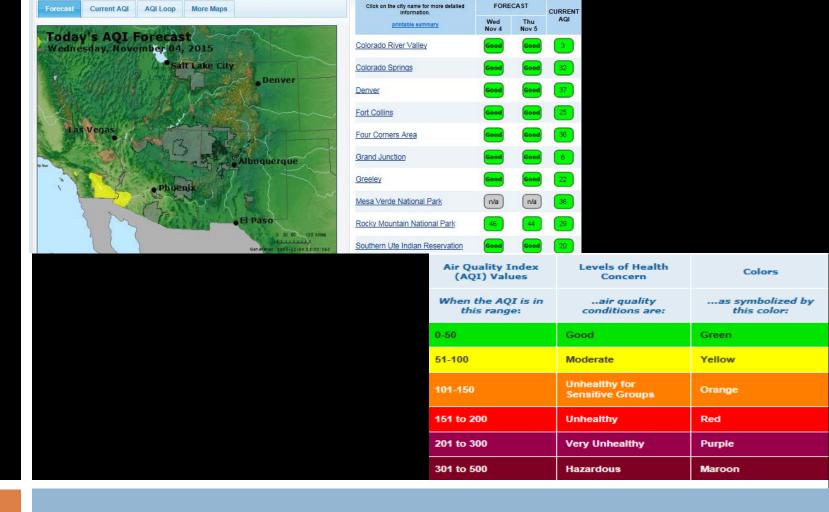
# 2008 to 2014 Ambient Air Monitoring Data Results/ NAAQS Comparison











#### Reporting to AirNow

- AQI
- AirNow.gov

### SUIT's Role in Air Quality Management on the Southern Ute Indian Reservation

- SUIT/CO Environmental Commission
- Reservation Air Code
- Title V Operating Permit Program
- Program Development

### SUIT/CO Environmental Commission





- Commission created by Intergovernmental Agreement (IGA) between Tribe and State in 1999 and supported by Federal legislation
- □ IGA established a unified air quality program within the exterior boundaries of the Reservation
- □ 3 State-Appointed and 3 Tribally-Appointed Commissioners
- Prescribes air quality control programs for the reservation
- Programs administered by the Reservation Air Program (SUIT AQP)

#### Reservation Air Code

- Mechanism for codification of air programs for the Reservation
- Currently contains:
  - General Provisions
  - Title V operating permit program
  - New Source Performance Standards
  - National Emission Standards for Hazardous Air Pollutant standards

# Title V (Part 70) Operating Permit Program



#### Program Approval and Implementation

- March 2, 2012— EPA approved the Tribe's Title V
   Operating Permit Program Application and Treatment As a State Application
- Authorized full permitting, compliance, and enforcement authority under Title V
- Completed transition of all permits from EPA in March,2015
- Began compliance inspections in 2014

#### What is a Title V Program?

- Required by Title V of the CAA
- Operating Permit Program for "Major Sources"
- Incorporates all "applicable requirements" into one permit to improve compliance
- Requires source to self-report compliance
- Program funded by Emission Fees

#### **Program Elements**

- Permitting
  - Currently 37 Title V sources on the SUIR
- Compliance
  - Each permitted source inspected every other year
- Enforcement
  - SUIT Enforcement Policy and Procedures Manual outlines procedures to bring non-compliant sources into compliance

#### Who's Subject?

"Major Sources"

Sources with the Potential to Emit:

■ 100 TPY of a single Criteria Pollutant

NOx, SO<sub>2</sub>, CO, PM2.5, PM10

<u>OR</u>

■ 10 TPY of a single Hazardous Air Pollutant (HAP)

<u>OR</u>

25 TPY of combined Hazardous Air Pollutants

188 Listed HAPs

Must apply for permit within 1-year of becoming major source

### Types of Title V Sources on the Southern Ute Reservation

- □ 37 Sources, including:
  - □ 32 Natural Gas Compressor Stations
  - □ 3 Natural Gas Treatment Plants
  - □ 1 Natural Gas Processing Plant
  - □ 1 Municipal Solid Waste Landfill

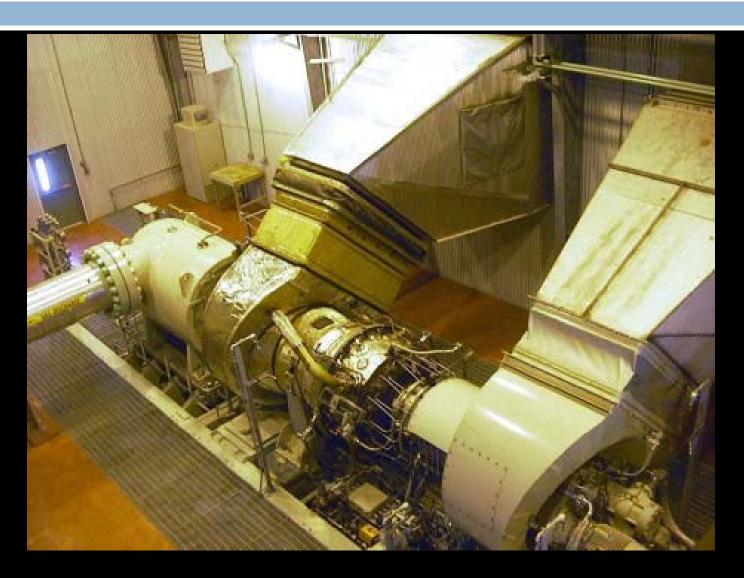
### Typical Emissions Sources at Natural Gas Production Facilities

- Compressor Engines
  - Reciprocating Internal Combustion
  - Turbines
- Tri-Ethylene Glycol Dehydration Units
- □ Tank vents
- Fugitive Emissions

## Reciprocating Compressor Engine – NOx, CO, VOC, HAP (formaldehyde)



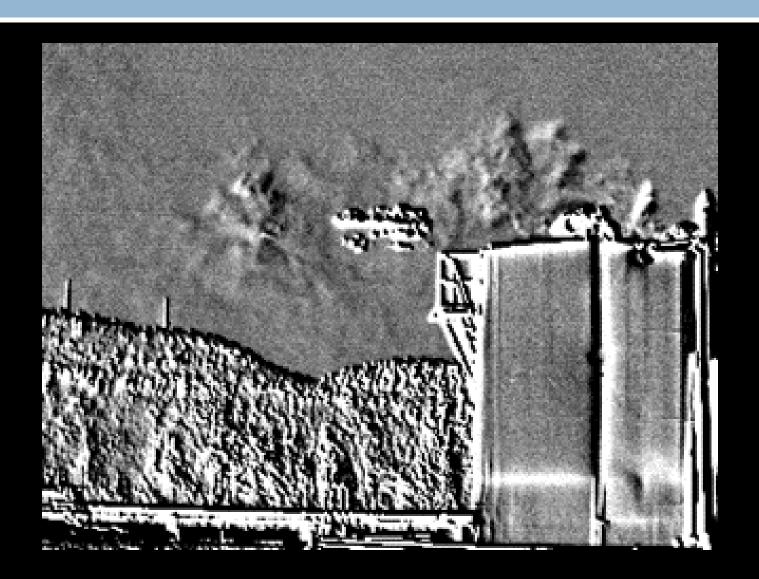
# Turbine - NOx, CO, VOC, HAP (formaldehyde)



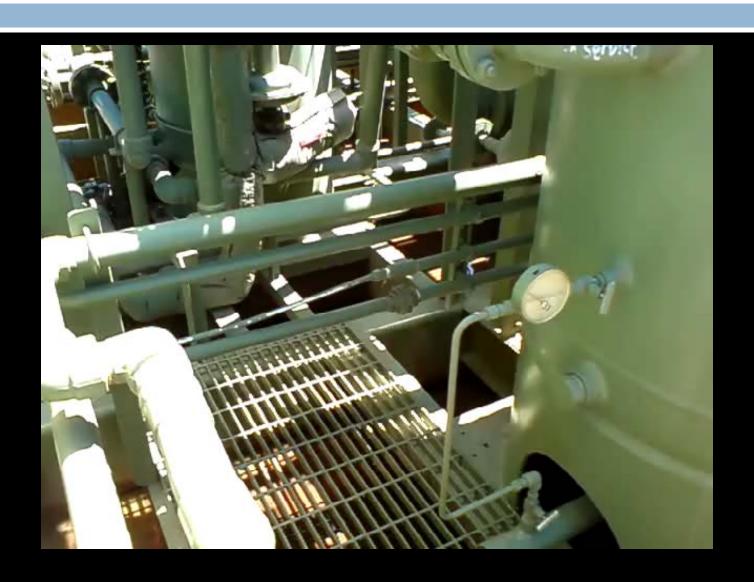
# Tri-ethylene Glycol Dehydrator — VOC and HAP (BTEX)



#### Tank Emissions –VOC and HAP (BTEX)



#### Fugitive Emissions – VOC and HAP



### Benefits of the IGA and the Tribe's Part 70 Program

- Unified regulatory authority simplifies permitting on the SUIR
- Local presence allows greater interaction and more frequent source compliance inspections
- Title V specific staff allows timely permit issuance, compliance assistance, and response to inquiries
- Improved Air Quality

#### Program Development/Next Steps

- Development of comprehensive emission inventories for Southern Ute Reservation
- Monitoring the development of the Federal Tribal Minor New Source Review Program for Oil and Gas Production sector
- Continuing to identify and understand sources of air emissions on the Reservation



#### THANK YOU

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