



Navajo Nation Environmental Protection Agency



Navajo Nation Air Quality Control Program Operating Permit Program

Route 112 North/Bldg. 2837
Fort Defiance, AZ 86504
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Presentation outline

- Mission of the Operating Permit Program
- Sources of Air Pollution
- Operating Permit Program
- Tribal Minor NSR on the Navajo Nation



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

Overview

- Navajo Nation Air Quality Control Program
 - Monitors ambient air quality
 - Open Burn Regulations
- Navajo Nation Operating Permit Program
 - Issues Title V permits to major sources on the Navajo Nation





Sources of Air Pollution





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

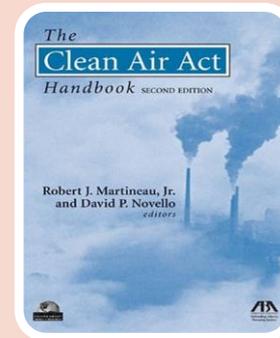


Title VI
Stratospheric
Ozone
Protection

Clean Air Act, USC Title 42 Chapter 85



Program Responsibilities



Issuance of Title V Permits

Compliance and Enforcement

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

Tribal Minor New Source Review

Minor New Source Review Rule in Indian County

- Applies to new and modified small facilities or
- minor modification at large facilities that have the **potential to emit** more equal to or more than the **minor NSR threshold** but less than the major NSR thresholds

The registration of Existing Sources

- How did we contact minor sources that needed to register?
 - Developed a Information Collection Form
 - Identified the most common sources on the Navajo Nation and easiest to register (Gas Stations)
 - Broke down the registration calculators to develop questionnaire sheets
 - Worked with the NN Economic Development Office to obtain a listing of business
 - Navajo Nation Phone Book

T-NSR sources

Identified sources that needed to be contacted based on the listing below

Gas Stations	Dry Cleaning Operations
Auto Body Shops	Sawmills
Land Fill Operations	Hot mix Asphalt Plants
Concrete Batch Plants	Printing Operations
Rock Crushing and Stone Processing	Surface Coating Operating
Degreasers/Solvents/Cleaners	Industrials Boilers
Stationary Internal Combustion Engines	



Navajo Nation Environmental Protection Agency – Air Quality Control/Operating Permit Program
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Telephone (928) 729-4096, Fax (928) 729-4313, Email airquality@navajo-nn.gov
www.navajonationnepa.org/airquality.html

Navajo Nation Businesses/Facilities Information Collection Form

Section 1- Business/ Facility Information

1	Parent Company Name:		
2	Parent Mailing Address:		
3	Ownership :	<input type="checkbox"/> Navajo	<input type="checkbox"/> Non-Navajo
4	Owner Name :	Title:	
5	Phone:	Fax:	Email:
6	On-site Contact Name:	Title:	
7	Phone:	Fax:	Email:

Section 2- Business/ Facility Location Information

1	Plant Name :		
2	Physical Address:		
3	County:	Navajo Nation Agency & Affiliated Chapter :	
4	Range:	Township:	Section:
5	Latitude:	Longitude:	Land Status:
6	Size of the Operating Area (indicate area on a site map and attach) : _____ acres		
7	Date of Business/Facility Operation:		
8.	Purpose of Business/Facility Operation :		

Section 3- Type of Business/ Facility (Check all that apply)

- Road Construction
- Earthmoving
- Autobody Refinishing
- Paint Booths
- Gasoline Dispensing Station
- Oil & Gas Wells
- Buildings (Commercial Institutional Residential)
- Hot Mix Asphalt Plant
- Concrete Batch Plant
- Sand & Gravel
- Incinerators
- Laundromat/Dry Cleaning
- Commercial Cooking
- Others (specify) _____

Section 4- Applicable Sections (Check all that apply)

- Boilers
- Generators
- Engines
- Storage Tanks (AST/UST)
- Silos
- Fuel Storage Tanks (AST/UST)
- Asphalt production
- Concrete
- Crushers & Screens
- Dust Generating Operations
- Others (specify) _____

Section 5- Detailed description of the Business/Facility

1. Is any air quality permit issued for the operation? Yes No
2. If "Yes", complete the following information below and attach a copy of permit.

Permit Number: _____ Permit Issue Date: _____
Permit Expiration Date: _____ Type of the Permit Issued _____
Permit Issuing Agency _____

Description of Operations, Products

Section 6- Emission related activities, equipment's and materials.

1. Operating Equipment List: Include machinery, storage silos, tanks, emission control devices, etc.

Assigned Equipment Number	Emission Unit Description Include Make & Model	Date of Installation	Equipment Rating in (HP, GAL or other rating)	Number of Hours in Operation Daily	
				Daily	Annual

2. Raw Material List : List all the materials handled, stored, processed, used, mixed, treated, or emitted, including but not limited to chemicals, mixtures, resins, cleaning compounds, etc. Provide material safety data sheets (MSDS) for each material.

Storage ID #	Material	Chemical Composition (% by weight)	Annual Usage or Throughput (gal/yr or lb/yr)

Section 7 - Dust Control Checklist (Check all that apply)

1. Will routine dust-generating operations be performed? Yes No
2. Will there be any unpaved parking lots at the business/facility? Yes No
3. Will there be any unpaved haul/access roads used by the business/facility? Yes No
4. If the answer to item 3 is "Yes", _____ miles; _____ width (ft.)
5. Are any of the bulk materials handled, stored or transported capable of producing fugitive dust? Yes No
6. Will there be any blasting operation performed by the business/facility? Yes No
7. Will there be any storage piles located at the business/facility? Yes No
8. If the answer to item 2 and 6 is "Yes", how many acres? _____
9. Will there be any open burning performed by the business/facility? Yes No
10. Describe in detail the mitigation methods that would be followed for dust generating operations.

Attachments

- Site Map*

Certification of Truth, Accuracy and Completeness by Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision to assure that qualified personal properly gathered and evaluated the information submitted. Based on My inquiry of the person or persons directly responsible for gathering the information, the information submitted, to the best of my knowledge and belief, true, accurate and complete.

Signature: _____ Date: _____ Title: _____

Print Name: _____ Date: _____

Instructions for Completing the Navajo Nation Business/Facility Information Collection Form

Section 1: Business/Facility Information:

This section is to be completed by the person submitting the application who is familiar with the Business/Facility and capable of answering the questions regarding the site.

Section 2: Business/Facility Location Information:

This section contains both mandatory and optional information that will assist in identifying the exact location of the business or facility. If the physical address has not been issued, a clear description of the physical location must be given. If an official Plant name has not been established, then a unique plant description is required. The "Purpose of Business /Facility" offers Navajo Nation Air Quality Control Program ("NNAQCP") an understanding of the work being completed.

Section 3: Type of the Business/Facility:

This section must contain a checkmark by each activity that will be performed at the Business/facility.

Section 4: Applicable Sections:

This section must contain a checkmark by each applicable section that apply to this project.

Section 5: Detailed Description of the Business/Facility:

This section must contain a detailed description of the business/facility; a site drawing is required showing the business/facility location and size of disturbance.

Section 6- Emission related activities, equipment's and materials:

This section is intended for all emissions related activities, equipment and raw materials that are handled, stored, processed, mixed, treated, and converted to finished products. Whenever available provide the manufacture's data sheets and literature.

Section 7- Dust Control Checklist:

This section must contain a checkmark for all the dust-generation operations involved in the project.

Instructions: In order to calculation your facilities potential to emit (PTE) please complete the table below and return it back to NNEPA as soon as possible.

Facility Name	# of dispensers	How many vehicles can be fueled simultaneously per pumping station	Does the pump operate 24 hours?

Important questions to help determine PTE

Facility Questions

Note: If your facility operated for only a portion of 2012, estimate the following information as if you had been operating for the whole year.

What is the number of vehicle refueling positions at your gasoline dispensing facility?	5
On average, how many hours per week were the refueling stations at your facility available to customers in calendar year 2012?	112.00
What were the average number of gallons dispensed per refueling event at your facility in calendar year 2012? (Enter 0 if unknown)	0.00
Average number of gallons dispensed per refueling event in 2012	11.00
For a refueling position, what is the average time (in hours) between the start of refueling events? (Enter 0 if unknown)	0.00
Average time (in hours) between the start of refueling events.	0.25





Registration Calculator Inputs		
Facility Information		
Name	Navajo Nation Gas Station	
Address	Hwy 264	
City	Window Rock	
State	Arizona	
Zip Code	86515	
Facility Contact		
Name	John Smith	
Telephone	928-871-1234	
Email	jsmith@google.com	
U.S. Environmental Protection Agency Region 9 Contact		
Primary Contact Name	Geoffrey Glass	
Primary Contact Telephone	415-872-3436	
Primary Contact Email	glass.geoffrey@epa.gov	
Alternate Contact Name	Roberto Gutierrez	
Alternate Contact Telephone	415-947-4276	
Alternate Contact Email	Gutierrez.roberto@epa.gov	
Address	U.S. Environmental Protection Agency Region 9 75 Hawthorne St. MC: AIR-3 San Francisco, CA 94105	
Air Basin Attainment Status		
CO Attainment Status (select one):	Attainment	
1997 8-Hr Ozone Attainment Status (select one):	Attainment	
SO ₂ Attainment Status (select one):	Attainment	
PM ₁₀ Attainment Status (select one):	Attainment	
PM _{2.5} Attainment Status (select one):	Attainment	
Facility Questions		
Note: If your facility operated for only a portion of 2012, estimate the following information as if you had been operating for the whole year.		
What is the number of vehicle refueling positions at your gasoline dispensing facility?	5	
On average, how many hours per week were the refueling stations at your facility available to customers in calendar year 2012?	112.00	
What were the average number of gallons dispensed per refueling event at your facility in calendar year 2012? (Enter 0 if unknown)	0.00	
Average number of gallons dispensed per refueling event in 2012	11.00	
For a refueling position, what is the average time (in hours) between the start of refueling events? (Enter 0 if unknown)	0.00	
Average time (in hours) between the start of refueling events.	0.25	

Facility Name: Navajo Nation Gas Station
Facility Address: Hwy 264
Window Rock, AZ 86515

Facility Contact: John Smith
Phone: 928-871-1234
Email: jsmith@google.com

Registration Summary

Pollutant	Estimated Actual Emissions for 2012 (tons/yr)	Allowable Emissions (tons/yr)	Minor Source Threshold (tons/yr)
CO	0.00	✓ 0.0	10.0
NO _x	0.00	✓ 0.0	10.0
SO ₂	0.00	✓ 0.0	10.0
VOC	9.89	⚠ 44.8	5.0
PM ₁₀	0.00	✓ 0.0	5.0
PM _{2.5}	0.00	✓ 0.0	3.0

Icon Key

- ⊗ Exceeds major source threshold.
- ⚠ Exceeds minor source threshold.
- ✓ Below minor source threshold.

YOU ARE REQUIRED TO REGISTER YOUR FACILITY UNDER THE TRIBAL NEW SOURCE REVIEW RULE

Please print and mail this page to your EPA Regional contact listed below. Alternatively, you may scan the printed page and email it to your EPA Regional contact.

U.S. Environmental Protection Agency Region 9 Contact

Name: Geoffrey Glass
Address: U.S. Environmental Protection Agency Region 9
75 Hawthorne St.
MC: AIR-3
San Francisco, CA 94105
Telephone: 415-972-3498
Email: glass.geoffrey@epa.gov

Industrial Boilers & Stationary internal combustion engines

- Generators
 - 2 stroke or 4 stroke
 - Type of fuel used?
 - Lean burn or rich burn
 - Emergency use or routine?
 - Horse Power
 - How much fuel used (gal/hr)?
 - Hours of operation for 2012
 - # of engines
- Boilers
 - Capacity (MMBtu)
 - Fuel type
 - Fuel usage
 - How much fuel consumed in 2012

T-NSR – Navajo Nation

- How are we currently working to contact sources?
 - Environmental Review (new sources)
 - Working with other NN programs (Storage Tank Program)
 - General outreach
- Has there been a T-NSR Permit issued on the Navajo Nation?
 - Minor New Source Review Permit Navajo Generating Station Installation of a refined coal treatment system
 - Fisher Sand & Gravel (First T-NSR Permit) Grey Mesa Gravel Pit (Newcomb, NM)

General Permits and Permits By Rule

- Hot Mix Asphalt Plants
- Stone Quarry, Crushing and Screening Facilities
- Gasoline Dispensing Facilities
- Petroleum Dry Cleaning Facilities
- Auto Body Repair and Miscellaneous Surface Coating Operations

Proposed FIP Oil and Natural Gas Production Industry

- Navajo Nation plans on commenting on the proposed FIP for new sources and the Navajo Nation will also be requesting information regarding regulating existing sources
- EPA is proposing to amend NSPS for the oil and gas sector by setting standards for both methane and VOC
 - The NN is supportive of this rule because of the methane issue in the FC area

Moving Forward

- Continue to work with EPA to address minor sources on the NN
 - Participate in calls
 - host the permit files at the OPP office
- Develop a system to track minor sources on the NN that have permits
- Navajo Nation plans to obtain a Part 70 permitting program where we would directly regulate these sources

Thank you!

Operating Permit Program
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