



# THE NAVAJO NATION

RUSSELL BEGAYE - PRESIDENT  
JONATHAN NEZ - VICE PRESIDENT

Navajo Nation Environmental Protection Agency – Air & Toxics Department  
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June 29, 2016

Alexis Strauss  
Acting Regional Administrator  
USEPA REGION 9  
75 Hawthorne Street  
**Mail Code:** ORA-1  
San Francisco, CA 94105

**RE: Implementation of Data Requirements Rule for SO<sub>2</sub> on the Navajo Nation – Data Requirements Rule for the 2010 1-Hour Sulfur Dioxide (SO<sub>2</sub>) Primary National Ambient Air Quality Standard (NAAQS); Final Rule**

Dear Ms. Strauss:

As per the Data Requirements Rule<sup>1</sup> (“DRR”) that requires an air agency to provide notice, by July 1, 2016, of the approach it will use to characterize air quality in the respective areas, the Navajo Nation Environmental Protection Agency (“NNEPA”), Air & Toxics Department (“ATD”), Air Quality Control Program (“AQCP”) here informs that air quality modeling will be used to demonstrate compliance with the National Ambient Air Quality Standards (“NAAQS”) for the two large sources of SO<sub>2</sub> on the Navajo Nation.

NNEPA submitted a draft modeling protocol to USEPA Region 9 on June 6, 2016 and in doing so believes that the July 1, 2016 deadline has been met. Since then, NNEPA has continued to participate on several calls and emails exchanges with USEPA Region 9 for the purposes of finalizing the modeling protocol and will continue to do so. As stated in the draft modeling protocol, NNEPA will use AERMOD (the latest version), and the identical geophysical and meteorological input data, modeling and receptor grids as used by the Four Corners Power Plant (FCPP) and the Navajo Generating Station (NGS) in the related modeling studies completed for recent Environmental Impact Statements (EISs) for renewal of operating leases for these two entities. The major changes between the new modeling studies we will conduct and previous studies prepared for the EISs are in the emission source terms of SO<sub>2</sub>.

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<sup>1</sup> “Data Requirements Rule for the 2010 1-Hour Sulfur Dioxide (SO<sub>2</sub>) Primary National Ambient Air Quality Standards (NAAQS); Final Rule,” 80 *Federal Register* 51052, August 21, 2015.

If you have any questions, please contact or email Mr. Michael King at [mzking@navajo-nsn.gov](mailto:mzking@navajo-nsn.gov), Senior Environmental Specialist, Air Monitoring Section of the Air Quality Control Program; telephone number 505-368-1046. You may also contact Ms. Eugenia Quintana, Environmental Department Manager, Air & Toxics Department at 928-871-7800. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Benn', with a long horizontal flourish extending to the right.

Dr. Donald Benn  
Executive Director  
Navajo Nation Environmental Protection Agency

xc: Vijay Limaye, Ph.D., USEPA Air Planning Office  
Doris Lo, USEPA Air Planning Office  
Gwen Yoshimura, USEPA Air Planning Office  
Scott Bohning, USEPA Air Planning Office  
Colleen McKaughan, USEPA Air Division