



## AIR QUALITY PROGRAM

ENVIRONMENTAL PROGRAMS DIVISION  
SOUTHERN UTE INDIAN TRIBE  
PO BOX 737, MS 84, IGNACIO, CO 81137  
Phone (970) 563-4705 · Fax (970) 563-0384

June 20, 2017

### Technical Advisory Bulletin #2

To: All Tribal Title V Permittees:

The Southern Ute Indian Tribe Air Quality Program (AQP) issues this technical advisory bulletin to clarify the extended natural gas analysis sampling frequency that the AQP considers sufficient and reasonable to support an exemption from the area source requirements in 40 CFR Part 63, Subpart HH (Subpart HH) pertaining to glycol dehydration units.

To support an exemption from 40 CFR §63.764 (d), Subpart HH requires a demonstration that “actual average benzene emissions are less than 0.90 megagrams per year” using inputs to the GRI-GLYCalc Model that are “representative of actual operating conditions.” [40 CFR §§ 63.764(e)(1)(ii) and 63.772(b)(2)(i)]

The AQP’s interpretation is that an annual extended gas analysis is representative of actual operating conditions and is, therefore, the minimum sampling frequency that sufficiently and reasonably demonstrates compliance with a “per year” benzene emissions limit. We intend to incorporate our interpretation into a permit requirement that will be added to all tribal Title V permits, as part of the permit renewal process, for facilities to which Subpart HH is an applicable requirement. Until we add the express permit requirement during the permit renewal process, we request all owners and operators who intend to claim exemption from 40 CFR §63.764 (d) to use an annual extended gas analysis to support the exemption.

For more information about the Southern Ute Indian Tribe Air Quality Program, please go to the following webpage: <http://www.southernute-nsn.gov/environmental-programs/air-quality/>

If you have any questions regarding this request please contact Mr. Oakley Hayes, Air Quality Scientist, at (970) 563-2244 or me at (970) 563-2265.

Sincerely,

A handwritten signature in black ink that reads "Danny Powers".

Danny Powers,  
Air Quality Technical Manager  
Southern Ute Air Quality Program