



AIR QUALITY PROGRAM

ENVIRONMENTAL PROGRAMS DIVISION
SOUTHERN UTE INDIAN TRIBE
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June 20, 2017

Technical Advisory Bulletin #3

To: All Tribal Title V Permittees:

The Southern Ute Indian Tribe Air Quality Program (AQP) issues this technical advisory bulletin to clarify the timeline the AQP considers sufficient and reasonable for performance testing under 40 CFR 40, Part 63, Subpart ZZZZ (Subpart ZZZZ), following the replacement of an engine catalyst.

The April 2, 2013, Environmental Protection Agency guidance document titled, *"Implementation Question and Answer Document for National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocation Internal Combustion Engines and New Source Performance Standards for Stationary Compression Ignition and Spark Ignition Internal Combustion Engines,"* asserts in item #22 on page 7, that Subpart ZZZZ does not provide a deadline for conducting performance testing following a catalyst change, but that an owner/operator should schedule a performance test as soon as possible following the catalyst change to demonstrate that the engine is still in compliance with emission standards.

To maintain consistency with the initial performance testing timelines established in Subpart ZZZZ and other Clean Air Act programs and regulations, the AQP considers a performance test conducted within 180-days following a catalyst replacement a sufficient and reasonable timeline for complying with Subpart ZZZZ. We intend to incorporate our 180-day expectation into a permit requirement that will be added to all tribal Title V permits during the permit renewal process. Until we add the express permit requirement, we request all owners and operators with facilities subject to Subpart ZZZZ to conduct a performance test within 180-days following a catalyst change.

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, appearing to read "Danny Powers".

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