



May 8, 2019



Tribal Perspective: EPA Power Plant Rules
Navajo Nation EPA Viewpoint



Navajo Nation



>180,000

>27,000 sq.mi.

52% unemployment
rate

38% live below poverty
level

\$10,695 average per
capita income

31% homes lack
plumbing

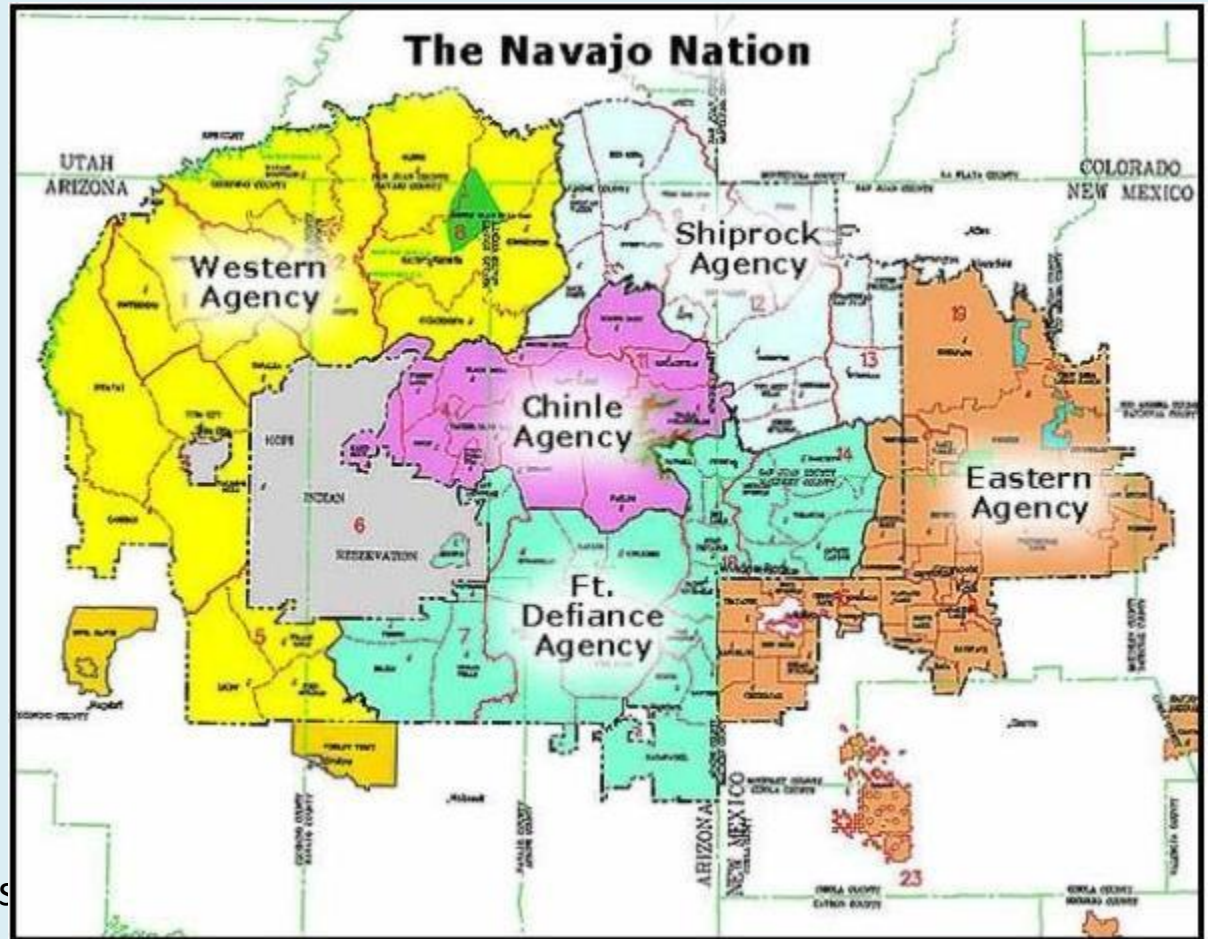
28% lack kitchen
facilities

38% lack water
services

32% lack electricity

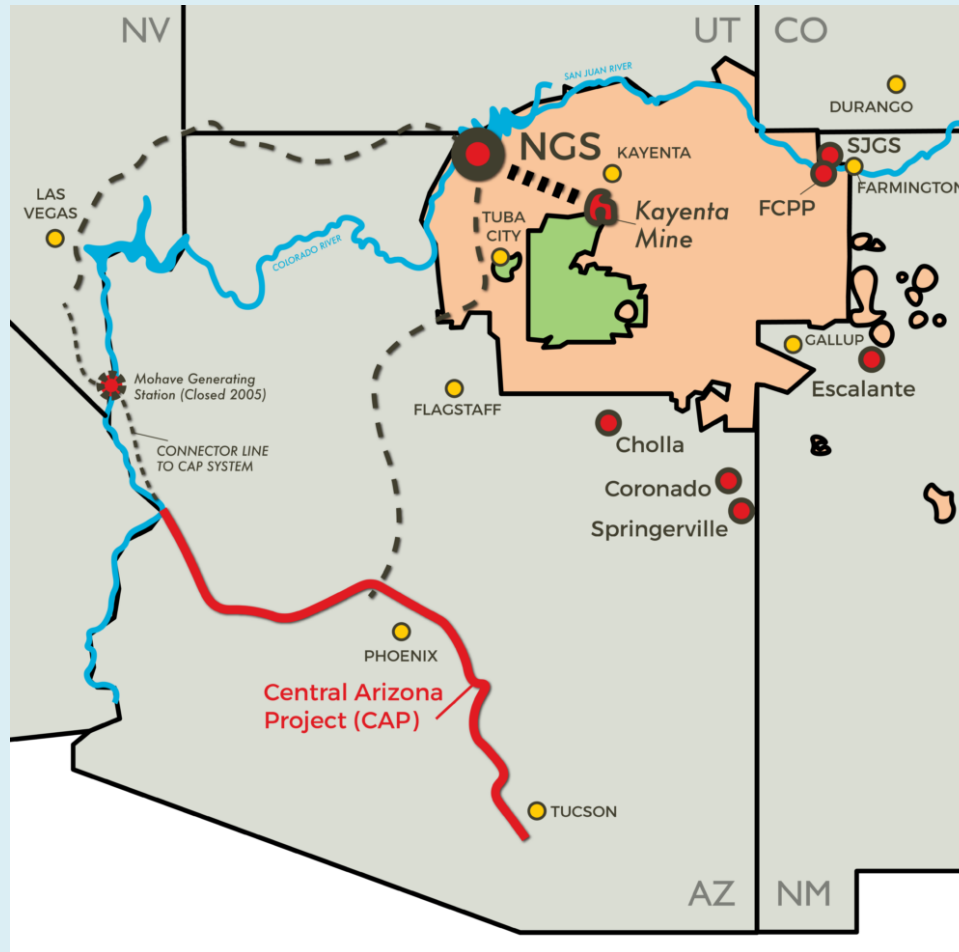
86% lack natural gas

60% lack telephone services





Power Plants on Navajo Nation





MATS – Mercury Air Toxics Standard



Choices

- pollution control equipment
- switching to cleaner-burning natural gas,
- or shutting down the plant.

Navajo Generating Station (NGS)

- December 2019, MATS, ACE, 111b no longer applicable

Four Corners Power Plant (FCPP)

- FCPP upgraded Distributed Control System to comply with MATS; have Mercury CEMS installed, have installed PM CEMS and are in the process of certifying the CEMS.
- FCPP conducting quarterly stack testing to show compliance with MATS.



Clean Power Plan (CPP) and Affordable Clean Energy (ACE)



- CPP stayed by the U.S. Supreme Court
- CPP did not go into effect
- ACE proposed on August 21, 2018 but has not been finalized.
- When finalized, EPA would repeal CPP and replace with ACE.
- ACE defines BSER for GHG emissions from existing power plants as on-site heat rate efficiency improvements.
- Under ACE, see if candidate technologies provided by EPA could be applied to individual boilers at FCPP.



Clean Power Plan and ACE – 111(b), 111(d)



- September 20, 2013: Carbon Pollution Standards proposed to limit carbon emissions from NEW power plants; no new power plants on the Navajo Nation (111b).
- June 2, 2014: EPA proposes Clean Power Plant to limit carbon emissions from EXISTING power plants in *states* (111d)
- October 28, 2014: EPA proposed Clean Power Plant to limit carbon emissions from existing power plants in Indian Country and U.S. Territories. Navajo has two (2) affected power plants (111d).
- EPA has proposed to repeal the CPP that was finalized under 111(d) and proposed to replace it with the ACE under 111(d)
- ACE proposed on August 21, 2018 but has not been finalized.
- When finalized, EPA would repeal CPP and replace with ACE.
- ACE defines BSER for GHG emissions from existing power plants as on-site heat rate efficiency improvements.
- Under ACE, see if candidate technologies provided by EPA could be applied to individual boilers at FCPP.
- CPP 111(b) and 111(d) will no longer affect NGS.
- CPP 111(b) does not affect FCPP.
- CPP 111(d) can affect FCPP. EPA will need to establish a standard of performance for FCPP and develop a FIP for FCPP.



May You Walk in Beauty



Ahéhee

Thank you!

Eugenia Quintana
Environmental Department Manager
Air & Toxics Department, Navajo Nation EPA
eugeniaquintana@navajo-nsn.gov