United States Department of the Interior

BUREAU OF RECLAMATION
Lower Colorado Region
Yuma Area Office
7301 Calle Agua Salada
Yuma, AZ 85364

IN REPLY REFER TO:
YAO-7220
ENV-8.10

OCT 19 2016

Mr. Gerard C. Rios
Chief
Air Division Permits Office (Air-3)
Environmental Protection Agency,
Region 9
75 Hawthorne Street
San Francisco, CA 94105

Subject: Addendum Letter for Bureau of Reclamation Permit Application Under the Federal Indian Country Minor New Source Review (NSR) Program

Dear Mr. Rios:

Per your letter dated October 5, 2016, Reclamation is submitting the enclosed addendum for the Federal Minor New Source application for the use of booster pumps on Quechan Tribal lands. Reclamation's minor permit application was submitted pursuant to the Minor NSR regulations at 40 CFR 49.154 and 49.155 on September 1, 2016. This letter provides the additional information you requested to continue with the completeness review of our permit application.

If you have any questions or need assistance please contact Mr. Henry Cabrera, Sr., Environmental Protection Specialist, by phone at 928-343-8227 or via e-mail at hcabrera@usbr.gov.

Sincerely,

Julian DeSantiago, Manager
Environmental Planning and Compliance Group

Enclosure

Addendum

EPA Completeness Review and Bureau of Reclamation, Yuma Area Office, Acknowledgement
Bureau of Reclamation Minor New Source Review Permit Application

We are in acknowledgement of your findings and have provided below the information on your interrogatories as indicated below.

1. *The Application for New Construction (EPA Form no. 5900-248) requires the name of a primary contact at the company that owns or operates the facility, and is responsible for compliance of the facility. The current compliance contact listed in the application is Lisa Beckham, an EPA staff person who is not a BOR employee and not responsible for compliance of the proposed Laguna Reservoir Restoration project. Please provide the name of a compliance contact at BOR under Part B, Contact Information.*

Acknowledgement 1:

Mr. Henry Cabrera, Sr., Environmental Specialist, will be the Bureau of Reclamation's Environmental Compliance contact for the booster pump system operations for this Minor New Source Review (NSR) Permit Application, see Enclosure 1, Updated Permit Application.

Mailing Address:

Bureau of Reclamation
Yuma Area Office (Attn: YA0-7200)
7301 Calle Agua Salada
Yuma, Arizona 85364

Phone #: 928-343-8227
Fax #: 928-343-8405
Email: hcabrera@usbr.gov

2. *Please list the engine year of the Caterpillar diesel engine that will be used in the proposed project. The engine year will help the EPA determine which regulations apply to the engine such as 40 CFR part 60, subpart 1111 and 40 CFR part 63, subpart ZZZZ.*

Acknowledgement 2:

As previously indicated in the application, our facility will be using a primary booster on a continuous basis. However, we will be adding a secondary booster for back up if the primary booster pump breaks down to ensure continuous progress of our project.

The Ellicott 860 Booster Pump is a centrifugal, single suction, volute type pump driven by an 800 HP (597 KW) Diesel Engine. It will operate for 20 hours, 4 days per week. The results of the average annual emissions for Emission Factors is performed on Air Emission Calculation Spreadsheet. Reclamation is requesting operating limits in its permit that are consistent with this operating schedule. However, these limits are not considered synthetic minor limits as potential emissions, at 8,760 hours of operation, do not exceed the major source thresholds. The results of the average annual emissions for Emission Factors is performed in the Enclosure 2(a) – Primary Booster Pump Air Emission Calculation Worksheet and Enclosure 2(b) – Air Emission Calculation Spreadsheet.

The primary booster pump to be used is Reclamation identification # 5940.207, Engine Family: ACPXL 106. T2E, Engine Model: C27, Date of Manufacturer: January 2011, Serial No. TWMO 2368. Enclosure 3(a) – (Primary) provides the Photo 1 of the Primary Booster Pump.

The secondary booster pump to be used is Reclamation identification # 5940.205, Engine Family: ACPXL 106.T2E, Engine Model: C27, Date of Manufacturer: January 2011, Serial No. TWMO 2366. Enclosure 3(b) – (Secondary) provides the Photo 2 of the Secondary Booster Pump.

3. *Under Section 7(a)(2) of the Endangered Species Act (ESA), the EPA must ensure that any action authorized, funded, or carried out by the EPA is not likely to jeopardize the continued existence of any federally listed endangered species or threatened species or result in the destruction or adverse modification of such species' designated critical habitat. The EPA cannot take action on a permit without the documentation that can help us determine if our action will have any of the above stated effects on an endangered species or its habitat. Please attach the U.S. Fish and Wildlife Service's biological and conference opinion letter generated for this application, mentioned in Section 4.3, page 7 of the BOR Minor NSR permit application.*

Acknowledgement 3:

Enclosure 4, is the documentation showing our completed Section 7 consultation process for the Laguna Reservoir Restoration Project, see Enclosure 3.

- March 5, 2005 – U.S. Fish and Wildlife Service issued a Biological and Conference Opinion (BCO) for all projects covered the Lower Colorado River Multi-Species Conservation Program (LCR MSCP).

- May 15, 2006 – U.S. Fish and Wildlife Service letter acknowledging that the Laguna Reservoir Restoration Project is a covered action under the 2005 BCO for the LCR MSCP.

- January 29, 2016 – Email from the U.S. Fish and Wildlife Service stating that the ongoing project is a covered action under the LCR MSCP's BCO.

Enclosure 1 – Updated Minor NSR Permit Application

OMB Control No. 2060-0003
Approval expires 04/30/2017

United States Environmental Protection Agency
Pacific Southwest – Region 9
Federal Minor New Source Review Program in Indian Country

Application for New Construction

Please check all that apply to show how you are using this form:

- ☐ Proposed Construction of a New Source
- x Proposed Construction of New Equipment at an Existing Source
- ☐ Proposed Modification of an Existing Source
- ☐ Other – Please Explain_____

Please submit information to:

U.S. EPA at:

Air Division, Permits Office (Air-3)
U.S. EPA, Region 9
75 Hawthorne Street
San Francisco, CA 94105

For more information:
http://www.epa.gov/caa-permitting/tribal-nsr-permits-region-9, call (415) 972-3974, or email R9AirPermits@epa.gov.

Tribe:

The Tribal Environmental Contact for the specific reservation:

Please contact EPA Region 9 if you need assistance in identifying the appropriate Tribal Environmental Contact and address.

A. General Source Information

1. Company Name **Bureau of Reclamation**		**2. Source Name** **Ellicott 860 SL Series Booster Pump**	
3. Type of Operation **Dredging**		**4. Portable Source?** **× Yes** **No** **5. Temporary Source?** **Yes** **No**	
6. NAICS Code **237990**		**7. SIC Code** **1629**	
8. Physical Address (home base for portable sources) **Laguna Field Office, 2400 Imperial Road, Winterhaven, California**			
9. Reservation* **Quechan**	**10. County*** **Yuma and Imperial**	**11a. Latitude*** **114 29 13.22W**	**11b. Longitude*** **32 49 34.21 N**
12a. Quarter-Quarter Section*	**12b. Section*** **30 and 31**	**12c. Township*** **T.15.S.**	**12d. Range*** **R.24.E.**

* Provide all locations of operation for portable sources

B. Contact Information

1. Owner Name **Bureau of Reclamation, Ms. Maria Ramirez**	Title Area Manager
Mailing Address 7301 Calle Agua Salada, Yuma, Arizona 85365	
Email Address mramirez@usbr.gov	
Telephone Number 928-343-8100	Facsimile Number 928-343-8320
2. Operator Name (if different from owner) Bureau of Reclamation, Mr. Jim Tate	Title Operations Manager
Mailing Address 7301 Calle Agua Salada, Yuma, Arizona 865365	
Email Address jtate@usbr.gov	
Telephone Number 928-343-8555	Facsimile Number 928-343-8320
3. Source Contact **Bureau of Reclamation – Henry Cabrera**	Title Sr. Environmental Protection Specialist
Mailing Address 7301 Calle Agua Salada, Yuma, Arizona 85365	
Email Address hcabrera@usbr.gov	
Telephone Number 928-343-8227	Facsimile Number 928-343-8405
4. Compliance Contact **Mr. Henry Cabrera**	Title Sr. Environmental Protection Specialist
Mailing Address 7301 Calle Agua Salada, Yuma, Arizona 85364	
Email Address hcabrera@usbr.gov	
Telephone Number 928-343-8227	Facsimile Number 928-343-8405

C. PREVIOUS PERMIT ACTIONS (Provide information in this format for each permit that has been issued to this source. Provide as an attachment if additional space is necessary)

Facility Name on the Permit New Source on Permit
Permit Number To Be Given by EPA
Date of the Permit Action

Facility Name on the Permit
Permit Number
Date of the Permit Action

Facility Name on the Permit
Permit Number
Date of the Permit Action

Facility Name on the Permit
Permit Number
Date of the Permit Action

Facility Name on the Permit
Permit Number
Date of the Permit Action

D. Attachments

Include all of the following information as attachments to this form

☐ **FORM SYNMIN** - New Source Review Synthetic Minor Limit Request Form, if synthetic minor limits are being requested.

XNarrative description of the proposed production processes. This description should follow the flow of the process flow diagram to be submitted with this application.

XProcess flow chart identifying all proposed processing, combustion, handling, storage, and emission control equipment.

XA list and descriptions of all proposed emission units and air pollution-generating activities.

X Type and quantity of fuels, including sulfur content of fuels, proposed to be used on a daily, annual and maximum hourly basis.

XType and quantity of raw materials used or final product produced proposed to be used on a daily, annual and maximum hourly basis.

X Proposed operating schedule, including number of hours per day, number of days per week and number of weeks per year.

X A list and description of all proposed emission controls, control efficiencies, emission limits, and monitoring for each emission unit and air pollution generating activity.

X**Criteria Pollutant Emissions** - Estimates of Current Actual Emissions, Current Allowable Emissions, Post-Change Uncontrolled Emissions, and Post-Change Allowable Emissions for the following air pollutants: particulate matter, PM_{10}, $PM_{2.5}$, sulfur oxides (SOx), nitrogen oxides (NOx), carbon monoxide (CO), volatile organic compound (VOC), lead (Pb) and lead compounds, fluorides (gaseous and particulate), sulfuric acid mist (H_2SO_4), hydrogen sulfide (H_2S), total reduced sulfur (TRS) and reduced sulfur compounds, including all calculations for the estimates.

These estimates are to be made for each emission unit, emission generating activity, and the project/source in total. Note, there are no insignificant emission units or activities in this permitting program, only exempted units and activities. Please see the regulation for a list of exempted units and activities.

X **Air Quality Review**

X **ESA (Endangered Species Act)**

X **NHPA (National Historic Preservation Act)**

E. TABLE OF ESTIMATED EMISSIONS

The following estimates of the total emissions in tons/year for all pollutants contained in your worksheet stated above should be provided.

Pollutant	Total Actual Emissions (tpy)	Total Allowable or Potential Emissions (TPY)
PM	n/a	1.16
PM_{10}		1.16
$PM_{2.5}$		1.16
SO_x		.02
NO_x		17.52
CO		9.58
VOC		1.17
Pb		0
NH_3		0
Fluorides		0
H_2SO_4		0
H_2S		0
TRS		0
RSC		0

PM - Particulate Matter
PM_{10} - Particulate Matter less than 10 microns in size
$PM_{2.5}$ - Particulate Matter less than 2.5 microns in size
SO_2 - Sulfur Oxides
NOx - Nitrogen Oxides
CO - Carbon Monoxide
VOC - Volatile Organic Compound
Pb - Lead and lead compounds
Fluorides - Gaseous and particulates
H_2SO_4 - Sulfuric Acid Mist
H_2S - Hydrogen Sulfide
TRS - Total Reduced Sulfur
RSC - Reduced Sulfur Compounds

Emissions calculations must include fugitive emissions if the source is one the following listed sources, pursuant to CAA Section 302(j):

(a) Coal cleaning plants (with thermal dryers);
(b) Kraft pulp mills;
(c) Portland cement plants;
(d) Primary zinc smelters;
(e) Iron and steel mills;
(f) Primary aluminum ore reduction plants;
(g) Primary copper smelters;
(h) Municipal incinerators capable of charging more than 250 tons of refuse per day;
(i) Hydrofluoric, sulfuric, or nitric acid plants;
(j) Petroleum refineries;
(k) Lime plants;
(l) Phosphate rock processing plants;
(m) Coke oven batteries;
(n) Sulfur recovery plants;
(o) Carbon black plants (furnace process);
(p) Primary lead smelters;
(q) Fuel conversion plants;
(r) Sintering plants;
(s) Secondary metal production plants;
(t) Chemical process plants
(u) Fossil-fuel boilers (or combination thereof) totaling more than 250 million British thermal units per hour heat input;
(v) Petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels;
(w) Taconite ore processing plants;
(x) Glass fiber processing plants;
(y) Charcoal production plants;
(z) Fossil fuel-fired steam electric plants of more that 250 million British thermal units per hour heat input, and
(aa) Any other stationary source category which, as of August 7, 1980, is being regulated under section 111 or 112 of the Act

E(ii) – Proposed New Construction at an Existing Source or Modification of an Existing Source

Pollutant	Current Actual Emissions (tpy)	Current Allowable Emissions (tpy)	Post-Change Potential Emissions (tpy)	Post-Change Allowable Emissions (tpy)
PM				
PM_{10}				
$PM_{2.5}$				
SO_2				
NO_x				
CO				
VOC				
Pb				
Fluorides				
H_2SO_4				
H_2S				
TRS				
RSC				

PM - Particulate Matter
PM_{10} - Particulate Matter less than 10 microns in size
$PM_{2.5}$ - Particulate Matter less than 2.5 microns in size
SO_2 - Sulfur Oxides
NOx - Nitrogen Oxides
CO - Carbon Monoxide
VOC - Volatile Organic Compound
Pb - Lead and lead compounds
Fluorides - Gaseous and particulates
H_2SO_4 - Sulfuric Acid Mist
H_2S - Hydrogen Sulfide
TRS - Total Reduced Sulfur
RSC - Reduced Sulfur Compounds

The public reporting and recordkeeping burden for this collection of information is estimated to average 20 hours per response, unless a modeling analysis is required. If a modeling analysis is required, the public reporting and recordkeeping burden for this collection of information is estimated to average 60 hours per response .Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

Instructions

(Please do not include a copy of these instructions in the application you submit to us.)

Use of This Form

- Proposed new construction or modifications should first be evaluated to determine if the change is major under the major NSR program using the procedures at 40 CFR 52.21 (i.e., baseline actual to projected actual applicability test). If the proposed construction does not qualify as a major under that test, then it may be subject to the requirements of the minor NSR rule at 40 CFR 49.151.

Helpful Definitions from the Federal Minor NSR Rule (40 CFR 49) – This is not a comprehensive list.

- *40 CFR 49.152(d) - Modification* means any physical or operational change at a source that would cause an increase in the allowable emissions of the affected emissions units for any regulated NSR pollutant or that would cause the emission of any regulated NSR pollutant not previously emitted.

  The following exemptions apply:

  (1) A physical or operational change does not include routine maintenance, repair, or replacement.

  (2) An increase in the hours of operation or in the production rate is not considered an operational change unless such increase is prohibited under any federally-enforceable permit condition or other permit condition that is enforceable as a practical matter.

  (3) A change in ownership at a source is not considered a modification.

- *40 CFR 49.152(d) - Allowable emissions* means "allowable emissions" as defined in §52.21(b)(16), except that the allowable emissions for any emissions unit are calculated considering any emission limitations that are enforceable as a practical matter on the emissions unit's potential to emit.

- *52.21(b)(16) - Allowable emissions* means the emissions rate of a stationary source calculated using the maximum rated capacity of the source (unless the source is subject to federally enforceable limits which restrict the operating rate, or hours of operation, or both) and the most stringent of the following:

  (i) The applicable standards as set forth in 40 CFR parts 60 and 61;

  (ii) The applicable State Implementation Plan emissions limitation, including those with a future compliance date; or

(iii) The emissions rate specified as a federally enforceable permit condition, including those with a future compliance date.

A. General Facility Information

1. Company Name & Operator Name (if the operator of the facility is different than the owner, please provide this information): Provide the complete company and operator names. For corporations, include divisions or subsidiary names, if any.

2. Facility Name: Provide the facility name. Please note that a facility is a site, place, location, etc... that may contain one or more air pollution emitting units.

3. Type of Operation: Indicate the generally accepted name for the operation (i.e., asphalt plant, gas station, dry cleaner, sand & gravel mining, oil and gas wellsite, tank battery, etc.).

4. Portable Source: Will this facility operate in more than one location? Some examples of portable sources include asphalt batch plants and concrete batch plants.

5. Temporary Source: A temporary source, in general, would have emissions that are expected last less than 12 months.

6. NAICS Code: North American Industry Classification System. The NAICS Code for your facility can be found at the following link → North American Industry Classification System (http://www.census.gov/epcd/naics/nsic2ndx.htm#S1).

7. SIC Code: Standard Industrial Classification Code. Although the new North American Industry Classification System (NAICS) has replaced the SIC codes, much of the Clean Air Act permitting processes continue to use these codes. The SIC Code for your facility can be found at the following link → Standard Industrial Classification Code (http://www.osha.gov/pls/imis/sic_manual.html).

8. Physical Address: Provide the actual address of where you are proposing to construct the new facility, not the mailing address. Include the State and the ZIP Code.

9. Reservation: Provide the name of the Indian reservation within which the facility will be constructed.

10. County: Provide the County within which the source will be constructed.

11a & 11b. Latitude & Longitude: These are GPS (global positioning system) coordinates.

12a – 12d. Section-Township-Range: Please provide these coordinates in 1/4 Section/Section/Township/Range. (e.g., SW ¼, NE ¼ S36/T10N/R21E).

B. Contact Information

Please provide the information, requested, in full.

1. Company Contact: Provide the full name of the primary contact for the company that owns the facility.

2. Operator Contact: Provide the name of the primary contact for the company that operates the facility if the company operating the facility is different from the company that owns the facility.

3. Permitting Contact: Provide the name of primary contact, for permitting decisions, at the company that owns the facility or the company that operates the facility.

4. Compliance Contact: Provide the name of primary contact, responsible for compliance of the facility, at the company that owns the facility or the company that operates the facility. If this is the same as the Permitting Contact please note this on the form.

B. Current Permit Information

Provide a list of all air quality permits that have been issued for this facility. This should include any Federal Minor New Source Review (MNSR), Prevention of Significant Deterioration (PSD) or Non-Attainment New Source Review (NA NSR) permits, in addition to the most recent Part 71 permit. The permit number must be included with each permit identified.

C. Attachments

This section lists the information needed to complete the requested approval. This information should be accompanied by the supporting information listed on the form and described below. The information should be presented in enough detail to document how the facility is currently operating and/or how it is proposed to be operated.

☐ **FORM SYNMIN**

If synthetic minor limits are being requested, a synthetic Minor Limit Application should be included with this application.

☐ Narrative description of the proposed production processes.

1. The narrative description should follow the flow of the process flow diagram to be submitted with this application. This needs to be as comprehensive as possible to help in understanding the proposed facility and how it will be operated. For example:

What are the raw materials?
What are the properties of the raw materials?
Does the production process include heating, drying, the application of chemicals, etc?
How will the raw materials be affected by this process?
What are the out puts from each step of the process (i.e., crushed ore, dry gas, water, etc...)?
Etc....

2. The proposed operating schedule presented in terms of hours per day, days per week, and weeks per year.
3. A list of the type and quantity of fuels and/or raw materials used. Each fuel and raw material should be described in enough detail to indicate its basic chemical components.

☐ A process flow chart identifying all proposed processing, combustion, handling, storage, and emission control equipment. This flow chart should illustrate the detailed narrative description requested above.

☐ List and describe all proposed units, emission units and air pollution-generating activities. At a minimum, provide the following:

1. The hourly, daily and annual maximum operating rates for each operating unit, production process, and activity.
2. The hourly, daily and annual maximum firing rates for each fuel and combustion equipment.
3. The capacity for storage units and the hourly, daily and annual maximum throughput of material in the storage units.
4. Material and product handling equipment and the hourly, daily and annual maximum throughput of material and product.
5. Tank designs, tank storage capacities, hourly, daily and annual maximum throughput of material and product.

☐ Type and quantity of fuels, including sulfur content of fuels, proposed to be used on a daily, annual and maximum hourly basis.

☐ Type and quantity of raw materials used or final product produced proposed to be used on a daily, annual and maximum hourly basis.

☐ Proposed operating schedule, including number of hours per day, number of days per week and number of weeks per year.

☐ A list and description of all proposed emission controls, control efficiencies, emission limits, and monitoring for each emission unit and air pollution generating activity.

1. Include manufacturer specifications and guarantees for each control device.

Criteria Pollutant Emissions Estimates

☐ Estimates of Current Actual Emissions, Current Allowable Emissions, Post-Change Uncontrolled Emissions, and Post-Change Allowable Emissions for the following air pollutants: particulate matter, PM_{10}, $PM_{2.5}$, sulfur oxides (SO_2), nitrogen oxides (NOx), carbon monoxide (CO), volatile organic compound (VOC), lead (Pb) and lead compounds, ammonia (NH_3), fluorides (gaseous and particulate), sulfuric acid mist (H_2SO_4), hydrogen sulfide (H_2S), total reduced sulfur (TRS) and reduced sulfur compounds, including all calculations for the estimates.

1. These estimates are to be made for each emission unit, emission generating activity, in addition to total emissions.

2. The information should include all of the supporting calculations, assumptions and references. Emission estimates must address all emission units and pollutants proposed and/or affected by the limitation and be presented in short term (e.g. pounds per hour) as well as annual (tons per year) units.

3. Any emission estimates submitted to the Regional Administrator must be verifiable using currently accepted engineering criteria. The following procedures are generally acceptable for estimating emissions from air pollution sources:

   - Unit-specific emission tests;
   - Mass balance calculations;
   - Published, verifiable emission factors that are applicable to the unit. (i.e. manufacturer specifications)
   - Other engineering calculations; or
   - Other procedures to estimate emissions specifically approved by the Regional Administrator.

4. Guidance for estimating emissions can be found at http://www.epa.gov/ttn/chief/efpac/index.html.

Current Actual Emissions: Current actual emissions for a pollutant is expressed in tpy and generally is calculated by multiplying the actual hourly emissions rate in pounds per hour (lbs/hr) times actual hours operated (which is the number of hours in a year) and dividing by 2,000 (which is the number of pounds in a ton).

1. For an **existing air pollution source (permitted and unpermitted)** that operated prior to the application submittal, the current actual emissions are the actual rate of emissions for the preceding calendar year and must be calculated using the actual operating hours, production rates, in-place control equipment, and types of materials processed, stored, or combusted during the preceding calendar year. The emission estimates must be based upon actual test data or, in the absence of such data, upon procedures acceptable to the Regional Administrator.

Current Allowable Emissions: Current allowable emissions for a pollutant is expressed in tpy and generally is calculated by multiplying the allowed hourly emissions rate in pounds per hour (lbs/hr) times allowed hours (which is the number of hours in a year) and dividing by 2,000 (which is the number of pounds in a ton).

1. "Allowed" means the source is restricted by permit conditions that limit its emissions and are enforceable as a practical matter (i.e., allowable emissions). The allowable emissions for any

emissions unit are calculated considering any emissions limitations that are enforceable as a practical matter on the unit's PTE.

2. For an **existing permitted air pollution source** that operated prior to the application submittal, the current allowable emissions are the allowable rate of emissions for the preceding calendar year and must be calculated using the permitted operating hours, production rates, in-place control equipment, and types of materials processed, stored, or combusted during the preceding calendar year.

3. For an **existing air pollution source** that does not have an established allowable emissions level prior to the modification must report the pre-change uncontrolled emissions.

Post-Change Potential Emissions (Potential uncontrolled emissions from proposed project): This is the maximum capacity of a source to emit a pollutant under its physical and operational design. This is expressed in tpy and generally is calculated by multiplying the maximum hourly emissions rate in pounds per hour (lbs/hr) times 8,760 hours (which is the number of hours in a year) and dividing by 2,000 (which is the number of pounds in a ton).

Post-Change Allowable Emissions: A source's allowable emissions for a pollutant is expressed in tpy and generally is calculated by multiplying the allowed hourly emissions rate in pounds per hour (lbs/hr) times allowed hours (which is the number of hours in a year) and dividing by 2,000 (which is the number of pounds in a ton).

1. Unless the source is restricted by permit conditions or other requirements that are enforceable as a practical matter, the post-change allowable emissions would be equivalent to post-change uncontrolled emissions. For the post-change allowable emissions a lower level of allowable emissions may be proposed.

2. For physical or operational changes at minor sources and for minor physical or operational changes at major sources, the total increase in allowable emissions resulting from your proposed change would be the sum of following:

   - For each new emissions unit that is to be added, the emissions increase would be the potential to emit of each unit.
   - For each emissions unit with an allowable emissions limit that is to be changed or replaced, the emissions increase would be the allowable emissions of the emissions unit after the change or replacement minus the allowable emissions prior to the change or replacement. However, this may not be a negative value. If the allowable emissions of an emissions unit would be reduced as a result of the change or replacement, use zero in the calculation.
   - For each unpermitted emissions unit (i.e., a unit without any emissions limitations before the change) that is to be changed or replaced, the emissions increase would be the allowable emissions of the unit after the change or replacement minus the potential to emit prior to the change or replacement. However, this may not be a negative value. If

the allowable emissions of an emissions unit would be reduced as a result of the change or replacement, use zero in the calculation.

☐ **Air Quality Review**

Provide a narrative description of the current air quality conditions and the expected impact the permitted source would have on that air quality. Factors to include in the qualitative discussion are meteorology, terrain, elevation, distance to ambient air, expected emissions, stack heights, etc...

Your reviewing authority may require you to provide additional information used to determine impacts that may result from your new source or modification. You may be required to conduct and submit an Air Quality Impact Analysis (AQIA) using dispersion modeling in accordance with 40 CFR part 51, Appendix W. If required, and the AQIA demonstrates that construction of your source or modification would cause or contribute to a NAAQS or PSD increment violation, you will also required to further reduce its impact before you could obtain a permit.

☐ **ESA**

The Endangered Species Act requires us, in consultation with the U.S. Fish and Wildlife Service and/or the NOAA Fisheries Service, to ensure that actions we authorize are not likely to jeopardize the continued existence of any listed species or result in the destruction or adverse modification of designated critical habitat of such species.

To expedite the approval of your proposed construction, we encourage you to identify any listed species that you may be readily aware of that could be affected by your proposal. The following website has been provided to assist you: http://www.fws.gov/endangered/

Simply enter the State and County in which you propose to construct to obtain a general listing.

☐ **NHPA**

The National Historic Preservation Act requires us, in consultation with State and/or Tribal Historic Preservation Officers to ensure that actions we authorize are not likely to affect cultural resources.

To expedite the approval of your proposed construction, we encourage you to identify any cultural resources that you may be readily aware of that could be affected by your proposal. The following website has been provided to assist you:
http://nrhp.focus.nps.gov/natreghome.do?searchtype=natreghome

Simply enter the State and County in which you propose to construct to obtain a general listing.

Enclosure 2 (a) -- Primary Booster Pump Air Emission Calculation Spreadsheet

Primary

20 hrs day/4 days week/52 weeks/yr

Description	Maximum Rating	Maximum Rating Units	Emission Factor	EF Units	Pollutant	EF Basis	lb/hr	Total Allowable/PTE, ton/yr
800 hp, Non-emergency, Catepillar diesel engine, Engine Family: ACPX106.T2E	800	bhp	0.0007	lb/hp-hr	PM	AP 42, Table 3.4-1	0.56	**1.16**
	800	bhp	0.0007	lb/hp-hr	PM_{10}	AP 42, Table 3.4-1	0.56	**1.16**
	800	bhp	0.0007	lb/hp-hr	$PM_{2.5}$	AP 42, Table 3.4-1	0.56	**1.16**
	800	bhp	0.000012135	lb/hp-hr	SO_x	AP 42, Table 3.4-1, Sulfur - 0.0015%	0.009708	**0.02**
	597	kW	6.4	g/kW-hr	NO_x	Part 89 limits, Certified emissions levels for engine family by EPA for ACPX106.T was 6.2 g/kW-hr, 1 gram = 0.00220462 lb	8.423412	**17.52**
	597	kW	3.5	g/kW-hr	CO	Part 89 limits, Certified emissions levels for engine family by EPA for ACPX106.T was 1.53 g/kW-hr, 1 gram = 0.00220462 lb	4.606553	**9.58**
	800	bhp	0.000705	lb/hp-hr	VOC	AP 42, Table 3.4-1	0.564	**1.17**
	800	bhp			Pb	No EF, assumed less than 0.01 tpy	0	**0.00**
	800	bhp			NH_3	No EF, assumed less than 0.01 tpy	0	**0.00**
	800	bhp			Fluorides	No EF, assumed less than 0.01 tpy	0	**0.00**
	800	bhp			H_2SO_4	No EF, assumed less than 0.01 tpy	0	**0.00**
	800	bhp			H_2S	No EF, assumed less than 0.01 tpy	0	**0.00**
	800	bhp			TRS	No EF, assumed less than 0.01 tpy	0	**0.00**
	800	bhp			RSC	No EF, assumed less than 0.01 tpy	0	**0.00**

Enclosure 2 (b) – Secondary Booster Pump Air Emission Calculation Spreadsheet

Secondary

20 hrs day/4 days week/52 weeks/yr

Description	Maximum Rating	Maximum Rating Units	Emission Factor	EF Units	Pollutant	EF Basis	lb/hr	Total Allowable/PTE, ton/yr
800 hp, Non-emergency, Catepillar diesel engine, Engine Family: ACPX106.T2E	800	bhp	0.0007	lb/hp-hr	PM	AP 42, Table 3.4-1	0.56	**1.16**
	800	bhp	0.0007	lb/hp-hr	PM_{10}	AP 42, Table 3.4-1	0.56	**1.16**
	800	bhp	0.0007	lb/hp-hr	$PM_{2.5}$	AP 42, Table 3.4-1	0.56	**1.16**
	800	bhp	0.000012135	lb/hp-hr	SO_x	AP 42, Table 3.4-1, Sulfur - 0.0015%	0.009708	**0.02**
	597	kW	6.4	g/kW-hr	NO_x	Part 89 limits, Certified emissions levels for engine family by EPA for ACPX106.T was 6.2 g/kW-hr, 1 gram = 0.00220462 lb	8.423412	**17.52**
	597	kW	3.5	g/kW-hr	CO	Part 89 limits, Certified emissions levels for engine family by EPA for ACPX106.T was 1.53 g/kW-hr, 1 gram = 0.00220462 lb	4.606553	**9.58**
	800	bhp	0.000705	lb/hp-hr	VOC	AP 42, Table 3.4-1	0.564	**1.17**
	800	bhp			Pb	No EF, assumed less than 0.01 tpy	0	**0.00**
	800	bhp			NH_3	No EF, assumed less than 0.01 tpy	0	**0.00**
	800	bhp			Fluorides	No EF, assumed less than 0.01 tpy	0	**0.00**
	800	bhp			H_2SO_4	No EF, assumed less than 0.01 tpy	0	**0.00**
	800	bhp			H_2S	No EF, assumed less than 0.01 tpy	0	**0.00**
	800	bhp			TRS	No EF, assumed less than 0.01 tpy	0	**0.00**
	800	bhp			RSC	No EF, assumed less than 0.01 tpy	0	**0.00**

Enclosure 3 (a) - (Primary) - Primary Booster Pump, BOR Identification # 5940.207

Photo 1 - Primary Ellicott 860 Booster Pump System with Diesel Engine

Enclosure 3(b) - Secondary - (Secondary) Back-Up Booster Pump, BOR Identification # 5940.205

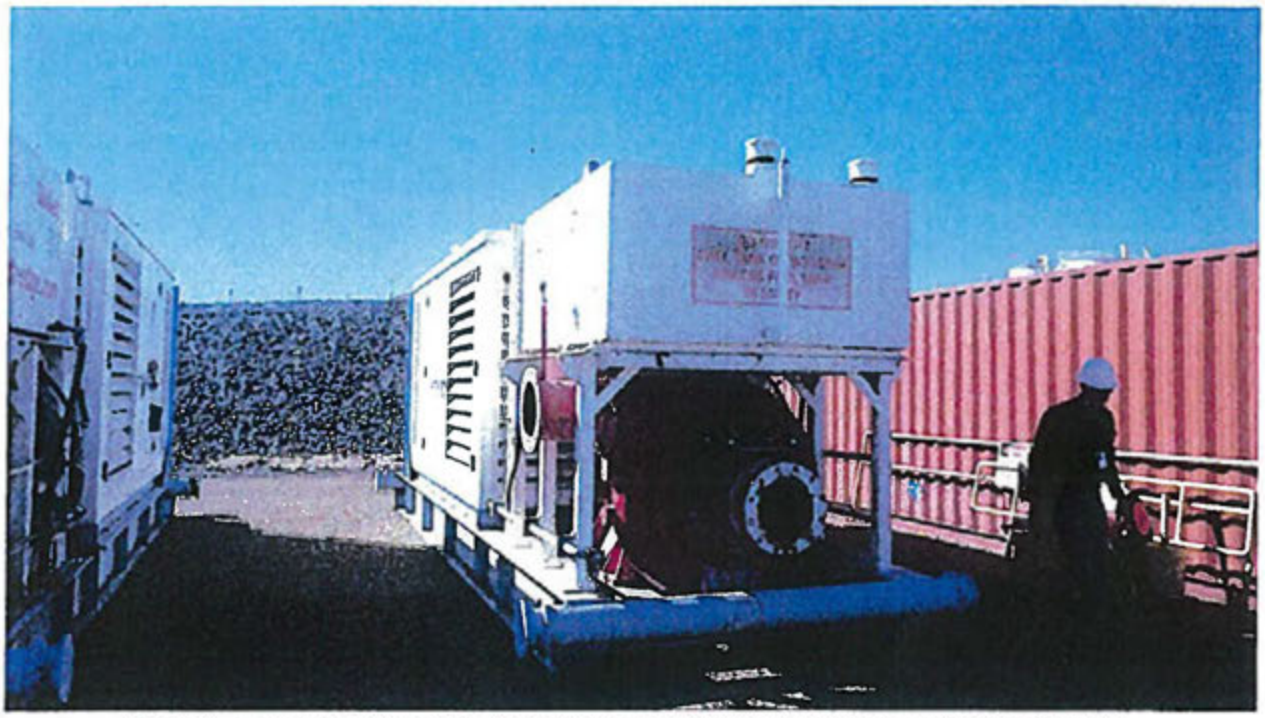

Photo 2 - Secondary Back-Up, Ellicott 860 Booster Pump System with Diesel Engine

Enclosure 4 – U.S. Fish and Wildlife Service documentation

United States Department of the Interior
U.S. Fish and Wildlife Service
2321 West Royal Palm Road, Suite 103
Phoenix, Arizona 85021-4951
Telephone: (602) 242-0210 FAX: (602) 242-2513

In Reply Refer To:

AESO/SE
02-21-04-F-0161

March 4, 2005

Memorandum

To: Regional Director, Southwest Region, Fish and Wildlife Service, Albuquerque, New Mexico (ARD-ES)
Regional Director, Lower Colorado Region, Bureau of Reclamation, Boulder City, Nevada (LC1200 ENV-1.10)

From: Field Supervisor

Subject: Biological and Conference Opinion on the Lower Colorado River Multi-Species Conservation Program, Arizona, California, and Nevada

This memorandum constitutes the attached biological and conference opinion (BCO) for the Lower Colorado River Multi-Species Conservation Program (LCR MSCP). This BCO addresses the effects to 27 species for which six Federal agencies and 24 Permit Applicants from Arizona, California, and Nevada requested incidental take coverage under section 7 and section 10 of the Endangered Species Act.

The BCO determined that the proposed actions described herein are not likely to jeopardize the continued existence of listed, candidate, or other covered species, and are not likely to destroy or adversely modify designated or proposed critical habitat.

Because this document is lengthy with many sections, we have provided a table of contents to assist in locating specific areas of the BCO. The official signature page for this BCO is located after the Reinitiation Notice on page 138.

We appreciate the efforts of the staff at the Bureau of Reclamation and the Southwest Regional Office of the Fish and Wildlife Service in preparing this document. If there are any questions concerning this BCO, please contact Jeff Whitney, Lesley Fitzpatrick, or me.

ENV-1.00

United States Department of the Interior
U.S. Fish and Wildlife Service
Arizona Ecological Services Field Office
2321 West Royal Palm Road, Suite 103
Phoenix, Arizona 85021-4951
Telephone: (602) 242-0210 Fax: (602) 242-2513

In Reply Refer to:
AESO/SE
02-21-02-I-0271
02-21-04-F-0161

May 15, 2006

Memorandum

To: Director, Resource Management Office, Yuma Area Office, Bureau of Reclamation, Yuma, Arizona (YAO-7210, ENV-1.10)

From: Field Supervisor

Subject: Laguna Restoration Project, Yuma County, Arizona and Imperial County, California

This responds to your May 8, 2006, request for Fish and Wildlife Service (FWS) concurrence with your determination for the Laguna Restoration Project in Yuma County, Arizona and Imperial County, California as a covered action under the Lower Colorado River Multi-Species Conservation Program (LCR MSCP).

The current project design for a 1,500 acre-foot storage basin is included in the list of Bureau of Reclamation (Reclamation) proposed actions as detailed in the Biological Assessment and confirmed in the Biological Opinion for the LCR MSCP. As documented and provided for in the LCR MSCP program documents, the loss of marsh, honey mesquite, and cottonwood-willow riparian habitats that support the LCR MSCP covered species is mitigated through the implementation of the Habitat Conservation Plan.

Thank you for the opportunity to provide our concurrence on the LCR MSCP status of the Laguna Restoration Project. If we may be of further assistance, please contact me at (602) 242-0210 x244 or Lesley Fitzpatrick (x236).

Steven L. Spangle

cc: Program Manager, LCR MSCP, Bureau of Reclamation, Boulder City, NV (LC-8000)
Federal Projects, Fish and Wildlife Service, Phoenix, AZ
Ms. Marjorie Blaine, Corps of Engineers, Tucson, AZ

\\Ifw2azp-fp1\workfiles\Lesley Fitzpatrick\02-271 Laguna Rest concurrence doc bml

DeSantiago, Julian <jdesantiago@usbr.gov>

Laguna Reservoir Restoration Project Update (Laguna Dam Dredging)

Gwinn, Jessica <jessica_gwinn@fws.gov> Fri, Jan 29, 2016 at 10:25 AM
To: "DeSantiago, Julian" <jdesantiago@usbr.gov>
Cc: Mike Martinez <mike_martinez@fws.gov>

Julian,

Thank you for the attached description of the Laguna Reservoir dredging protect. After reviewing the document and conversations with you, it is my understanding that project parameters have not substantially changes and that more time is simply needed to complete this project. This is a covered action under the Lower Colorado River Multi-Species Conservation Program (LCR MSCP). Please let me know if you need anything else.

Thank you for your patience,
Jess Gwinn
[Quoted text hidden]
--

Jessica Gwinn

U.S. Fish and Wildlife Service

Arizona Ecological Services Office

2321 West Royal Palm Road, Suite 103

Phoenix, Arizona 85021

(602)242-0210 Ex 249