

NAVAJO NATION ENVIRONMENTAL PROTECTION AGENCY
Navajo Air Quality Program

**PROGRAM DESCRIPTION
AND TRANSITION PLAN
FOR
A DELEGATED PART 71 PROGRAM**

July 16, 2004

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Program Description for a Navajo Delegated Part 71 Program

I. Introduction

This document describes how the Navajo Nation Environmental Protection Agency (“Navajo Nation EPA” or “NNEPA”), through the Navajo Nation Air Quality Control Program (“NAQCP”), intends to administer and enforce a delegated Clean Air Act (“CAA”) Title V Operating Permit Program consistent with the requirements of 40 C.F.R Part 71 and Navajo Nation law. The program description includes an overview of the Navajo delegated Part 71 operating permit program and a discussion of how the program and its implementation will be in accordance with federal requirements.

II. Organization of the NNEPA

In 1995, the Navajo Nation EPA was established as a separate regulatory agency within the executive branch of the Navajo Nation government, in order to ensure independence in the implementation and enforcement of environmental laws within the Navajo Nation for the protection of human health and the environment. The Resources Committee of the Navajo Nation Council provides legislative oversight of NNEPA. An Executive Director, appointed by the President of the Navajo Nation, administers the agency. The Executive Director (referred to as the “Director” in the Navajo Nation environmental laws) has rulemaking, regulatory, and enforcement authority, which he or she may delegate to the various NNEPA departments and programs as appropriate.

The NNEPA is organized into four departments: The Air & Toxics Department, the Waste Regulatory and Compliance Department, the Surface and Ground Water Protection Department and the Enforcement Department. Each department is administered by an Environmental Department Director who oversees departmental functions.

The Air & Toxics Department comprises four programs, the Air Quality Control Program, the Pesticides Program, the Radon Program, and the Asbestos Program. The Air Quality Control Program is headed by an Environmental Program Supervisor and employs additional staff to conduct ambient air monitoring and compliance inspections, assist in enforcement actions, and undertake program development and general office activities.

NNEPA	Air & Toxics Department
! Air & Toxics	! Asbestos Program
! Waste Regulatory & Compliance	! NAQCP
! Surface & Ground Water Protection	! Pesticides Program
! Enforcement	! Radon Program

III. Navajo Nation Laws

The following laws provide the NNEPA in general and the NAQCP in particular with the authority to regulate air quality within Navajo Nation lands:

Table 1. Relevant Navajo Nation Acts and Regulations

Acts / Regulations	Date Passed	Date Amended
Navajo Nation Environmental Policy Act	April 21, 1995	
Navajo Nation Air Pollution Control and Prevention Act	July 20, 1995	April 22, 2004
Navajo Nation Operating Permit Rule	April 13, 2000	July 8, 2004
Plan of Operation	May 22, 2001	
Navajo Nation Uniform Regulations	Sept. 5, 2001	
Navajo Nation Acid Deposition Control Regulations	July 8, 2004	

Copies of those acts and regulations pertaining to the delegated Part 71 program are provided as separate attachments to this application.

IV. Navajo Air Quality Control Program

A. Funding

The Navajo Air Quality Control Program was created in April 1992, beginning its operation under a Section 103 Air Grant awarded from EPA Region 9. The Program then submitted an application and received approval for a Section 105 Grant in 1999. The Program continues to operate under this Grant.

B. Purpose of Program

The Program is organized into four sections: Administration, Regulation Development, Compliance, and Air Monitoring. Though the primary goal of the Program is to obtain EPA approval of and to implement a CAA Title V operating permit program, and this task is currently assigned to the Regulation Development Section, the tasks and responsibilities of the other Program sections will also support the Title V program.

The Administration Section is responsible for administrative, personnel and finance matters related to the operation of the Program, such as taking personnel actions, handling time sheets, assisting in the hiring of personnel, preparing and maintaining budgets, and submitting reports.

The Regulation Development Section has completed the rulemaking process for the Navajo Nation Acid Rain Rule, the revised Navajo Nation Operating Permit Rule, and the revised Navajo Nation Clean Air Act. In addition, the Section completed the “treatment as a state” application that has already been submitted to EPA as part of the Navajo Nation’s application to administer a delegated Part 71 program. The Regulation Development Section also has finalized the delegation application that is currently being submitted to EPA. This Section also will be responsible for completing and submitting the Part 70 application to EPA.

The Compliance Section conducts inspections of all Title V and non-Title V sources located within the Navajo Nation, such as power plants, coal mines, and oil and gas facilities. In addition, this Section responds to citizen complaints, and is also updating the air emissions inventory for the tribe.

The Air Monitoring Section is responsible for maintaining the operation of and collecting data from four air monitoring stations located within the Navajo Nation. Work on two additional air monitoring sites is nearly completed and these stations are expected to begin operating soon.

C. Staffing

The following briefly describes the functions and responsibilities of the current staff:

1. Administration Section

Chris Lee, Program Supervisor

- a. Responsible for all personnel and administrative matters of the Program.
- b. Provides support and assistance to Regulation Development Section.
- c. Serves in Acting capacity for the Air & Toxics Department Director, as needed.
- d. Participates in regional air quality issues, e.g., the WRAP.
- e. Completes and submits Program reports.

Marjorie Nelson, Sr. Office Specialist

- a. Provides secretarial and clerical support.
- b. Assists the Supervisor in personnel and administrative matters of the Program.

2. Regulation Development Section

Wilson Laughter, Sr. Environmental Specialist

- a. Works on tasks necessary for NAQCP to assume a delegated Part 71 permit program, approved Part 70 Permit Program, rulemaking activities for existing laws as well as proposed legislation(s).

3. Compliance Section

Iris Begaye, Sr. Environmental Specialist

- a. Conduct inspections individually or jointly with other entities of all title V and non-title V sources on Navajo lands, including providing assistance on enforcement cases.
- b. Responds to citizen complaints.
- c. Maintains and updates Emissions Inventory databases.

4. Air Monitoring Section

Charlene Nelson, Sr. Environmental Specialist

- a. Develops and revises QAPP as needed.
- b. Works closely with Environmental Technician in the operation of the air monitoring network.
- c. Serves in Acting capacity for the Program Supervisor, as needed.

Roderick Yazzie, Environmental Technician

- a. Maintains and operates the Navajo air monitoring network.
- b. Responsible for requisition of parts and supplies.
- c. Constructs new air monitoring sites.

V. Implementation of Operating Permit Program

A. Introduction

The NAQCP proposes to establish and maintain a Title V operating permitting program that will encompass both new sources and existing sources. The NAQCP plans to achieve this goal in two steps. First, the Program will administer a delegated Part 71 permit program. Second, during the delegation period, the NAQCP will be working toward submitting an application for USEPA approval of a Navajo Part 70 Operating Permit Program within 12 months after receiving delegation to administer a Part 71 permit program. The NAQCP anticipates developing the necessary resources and expertise during the delegation period to allow for a smoother transition to a Navajo Part 70 Operating Permit Program. The necessary laws (as outlined in Table 1) are already in place authorizing the NNEPA Director, through the NAQCP, both to administer a Navajo delegated Part 71 Permit Program and to implement a Navajo Part 70 Operating Permit Program.

The NAQCP proposes to delay developing and implementing a minor source permit program until after the NAQCP has received approval from the USEPA to implement a Part 70 program (the NAQCP may develop this program earlier if it determines it has sufficient personnel and resources). Once the NAQCP has established a minor source permit program, all affected sources will be required to receive a minor source air permit in accordance with the Navajo Clean Air Act (and Navajo Minor Source Rule that has yet to be developed).

B. Transition From an EPA Part 71 Program to a Navajo Delegated Part 71 Program

USEPA has issued Part 71 permits to 12 of the 14 sources within Navajo Indian country and intends to issue the remaining two permits by September 1, 2004. In the event the two remaining permits are not issued by September 1, 2004, the NNEPA will work in conjunction with Region IX to issue these remaining permits in a timely manner. The NAQCP is seeking to administer a delegated Part 71 program for 12 of these sources, which are listed in Table 2.¹ This program will be a fully delegated program under 40 C.F.R. § 71.10 with respect to those 12 sources.

Within three months of the delegation the NNEPA will administratively amend the permits for these 12 existing Part 71 sources to reflect the change in permitting authority and to revise the appropriate addresses for purposes of reporting and fee payment. USEPA will retain its permit review authority, enforcement authority and other authorities as described further in the Delegation Agreement. The permits will otherwise remain unchanged. The NAQCP will process these permit modifications, as discussed further below.

Listed in Table 2 are the existing sources that will be subject to the delegated Part 71 permit program. This table also includes the amount each source is likely to pay in fees in FY2005 (based on projected emissions) and the annual payment date for each source:

Table 2. Part 71 fees for sources for which NNEPA is seeking Part 71 delegation

Facility Name	Projected Fee amount for FY05	Anniversary Date of Payment
El Paso Natural Gas– Leupp Station	\$97,641	Sept. 1
El Paso Natural Gas– Dilkon Station	\$ 4,364	Sept. 1
El Paso Natural Gas– Navajo Station	\$18,237	Sept. 1
El Paso Natural Gas– Window Rock Station	\$80,941	April 1
El Paso Natural Gas– Gallup Station	\$30,082	April 1
El Paso Natural Gas– White Rock Station	\$ 8,801	April 1
Peabody Western Coal Company	\$87,974.73	Sept. 1
Transwestern Pipeline Co. Leupp Station	\$33,281.75	Sept. 1
Transwestern Pipeline Co. Klagatoh Station	\$35,930.35	Sept. 1

¹ The NAQCP is not including the Four Corners Power Plant or Navajo Generating Station in its delegation application at this time, for the reasons discussed in the Navajo Nation’s eligibility application submitted pursuant to 40 C.F.R. § 49.6 and 49.7 and in the jurisdictional statement that is a part of that application. The Navajo Nation may supplement its delegation application in the future to include the two power plants, depending upon the status of negotiations with the power plants.

ConocoPhilips Wingate Fractionating Plant	\$ 1,755.26	Sept. 1
Chevron Texaco Aneth Unit	\$14,708	April 1
ExxonMobil McElmo Creek Unit	\$ 6,123.46	April 1
Total Annual Revenue:	\$419,839.55	

The following sections discuss how the NAQCP will carry out its specific responsibilities in administering a delegated Part 71 program.

C. Permit Applications

Pursuant to the Delegation Agreement, USEPA will provide NNEPA with a list of all sources that have already received Part 71 permits from the USEPA and of all sources, if any, that have not yet received a Part 71 permit and will require one. USEPA also will provide NNEPA with copies of all applications for sources within the Navajo Nation, if any, that have not yet received a Part 71 permit.

If there are any Part 71 sources that have not received a Part 71 permit, or if there are new Part 71 sources during the period that NNEPA is administering the delegated program, NNEPA will review and make a determination of completeness for each new Part 71 permit application within 60 days of receipt. NNEPA will provide public notice of receipt of a new application for a Part 71 permit, revision or renewal.

The Navajo Air Quality Control Program will process permit applications pursuant to the procedures described in 40 C.F.R. § 71.5, subpart IV of the NNOPR and the Delegation Agreement. NNEPA will submit to the USEPA, beginning on April 15, 2005 (assuming that NNEPA receives delegation by September 1, 2004), a list of all permit applications that NNEPA intends to process on a semiannual basis. If the permit application is complete and accurate and NAQCP staff decides that a permit may be issued under the regulations, a draft permit will be prepared and the public will be notified that the NAQCP is proposing to issue a permit. NNEPA also will promptly inform the applicant and USEPA of the results of each application completeness review.

Pursuant to 40 C.F.R § 71.5, the following information will be required in an application: source identification information and exact location by latitude and longitude (or UTM), a description of the processes and products (by SIC) including any alternate operating scenario, emission rates and supporting information, a description of all equipment including pollution controls, a list of insignificant activities identifying emission unit and how the exemption applies, supporting information, citation and description of all applicable requirements and exemptions, a description of test methods, a compliance plan, a compliance certification, and a certification of truth, accuracy and completeness.

D. Permit Development and Review

Every permit issued will contain the items specified in 40 C.F.R. § 71.6 and all CAM

requirements under 40 C.F.R. Part 64. NNEPA will draft the permit in consultation with USEPA to ensure that all Part 71 requirements are incorporated into the permit. This consultation will include an opportunity for USEPA to review a copy of the draft permit prior to the beginning of the public comment period. NNEPA also will prepare a technical review memorandum and statement of legal and factual basis for each Part 71 permit in accordance with 40 C.F.R. § 71.11(b) and Navajo Nation Operating Permit Regulation § 401(B). NNEPA will provide public notice and comment regarding permit actions and conduct permit proceedings pursuant to 40 C.F.R. § 71.11 and Subpart IV of the NNOPR.

NNEPA will prepare a proposed permit that incorporates all changes, including any changes that result from EPA comments and the public comment period. NNEPA will submit to USEPA a copy of the proposed permit along with NNEPA’s responses to all comments received on the draft permit and all necessary supporting information, pursuant to 40 C.F.R. § 71.11(j). USEPA will have 45 days from its receipt of the permit to review and object to the proposed permit in accordance with the procedures set forth at 40 C.F.R. § 71.10(g).

NNEPA will not issue a permit if the Regional Administrator or his/her designee objects in writing within 45 days of receipt of the proposed permit and all necessary supporting information. Pursuant to 40 C.F.R. § 71.10(g)(1) and (2), any USEPA objections will include a statement of the reasons for objections and a description of the terms and conditions that the permit must include responding to the objection. USEPA will provide a copy of the objection to the permit applicant. NNEPA will, within 90 days after the date of an objection, revise and submit to USEPA the proposed permit in response to the objection. If NNEPA fails to do so, USEPA will issue or deny the permit in accordance with the requirements of Part 71, as provided in 40 C.F.R. § 71.10(g)(3).

E. Permit Issuance Process

Within the first three months of the delegation, NNEPA will make administrative amendments to all existing Part 71 permits to reflect the change in permitting authority from USEPA to NNEPA. The administrative amendments also will include but are not limited to changes in annual fee submittals, changes in reporting requirements and a statement that Part 71 permits are enforceable by NNEPA as well as USEPA.

Since NNEPA will not issue new Part 71 permits but instead will revise the existing Part 71 permits, the terms of the existing Part 71 permits will remain unaffected. As each permit comes up for renewal, NNEPA will then issue a renewal permit for a new five-year term. The expiration dates for the existing Part 71 permits are listed in Table 3 below.

Table 3. Part 71 permit expiration dates

Seq.	Facility Name (Location)	Expiration Date	Status
1	Transwestern Pipeline Klagatoh Sta (AZ)	04/24/2005	Current
2	Transwestern Pipeline Leupp Sta (AZ)	04/24/2005	Current
3	El Paso Natural Gas Navajo Sta (AZ)	05/11/2005	Current
4	El Paso Natural Gas Leupp Sta (AZ)	05/11/2005	Current
5	El Paso Natural Gas Dilkon Sta (AZ)	05/11/2005	Current

6	Conoco Wingate Fractionating Plant (NM)	12/21/2005	Current
7	El Paso Natural Gas Window Rock Sta (AZ)	12/25/2005	Current
8	El Paso Natural Gas White Rock Sta (NM)	12/25/2005	Current
9	El Paso Natural Gas Gallup Sta (NM)	12/25/2005	Current
10	Navajo Generating Station (AZ)	06/04/2006	Current
11	Four Corners Power Plant (NM)	06/11/2006	Current
12	Peabody Western Coal (AZ)	09/22/2008	Current
13	ChevronTexaco Aneth Unit (UT)	00/00/2009	Renewal by 09/01/2004
14	ExxonMobil McElmo Creek Unit (UT)	00/00/2009	Renewal by 09/01/2004

All new permits will be issued in the manner described in 40 C.F.R Part § 71.7 and in subpart IV of the Navajo Nation Operating Permit Rule and section 212 of the Navajo Uniform Rules, which are consistent with § 71.7. The Director will issue all new permits for a fixed term of five years, except that solid waste incineration units combusting municipal waste subject to the standards under CAA § 129(e), will be issued a permit for a period not to exceed 12 years.

F. Permit Fees

NNEPA will collect permit fees from all Part 71 sources subject to the delegated program. These fees will be collected pursuant to NNOPR Subpart VI, and are based on the “presumptive minimum” fee under the federal regulations. According to 40 CFR § 70.9(b)(2), the Administrator will presume that the fee structure is sufficient if the program requires the collection and retention of at least the presumptive minimum, or \$38.72 /ton per year of actual emissions (adjusted annually based on the Consumer Price Index), which is the amount required by the NNOPR. Moreover, a demonstration that the fees will be sufficient to cover the costs of the delegated program, as required by 40 C.F.R. § 71.9 and NNOPR § 602(C), is attached as Exhibit 1. The demonstration shows that the fees will cover both the direct and indirect costs of the Title V program, which include but are not limited to: regulation and guidance development, permit processing, administrative costs, enforcement, emissions and ambient monitoring, modeling, analyses or demonstrations, emissions inventory and tracking. These fees will be used solely for the Title V program costs. Therefore, since NNEPA has sufficient revenue authority to administer the delegated Part 71 program, USEPA will suspend collection of Part 71 fees, pursuant to 40 C.F.R. § 71.9(c)(2)(ii) and the Delegation Agreement.

Existing Part 71 sources will be required to pay an annual fee on the anniversary date of their Part 71 fee payment while new sources will be required to submit their fees within 60 days of commencing operation as a Part 71 source, pursuant to NNOPR §§ 603, 702. If USEPA delegates the Part 71 program to NNEPA by September 1, 2004, seven of the twelve existing Part 71 sources will be paying their fees to NNEPA on September 1, 2004, with the remainder paying on April 1, 2005 (see Table 2).

G. Enforcement

All terms and conditions in a permit, including but not limited to provisions designed to limit a source’s potential to emit, are enforceable by the Administrator pursuant to the CAA and by the Director pursuant to Subpart V of the Navajo Operating Permit Rule, Subpart 3 of the Navajo Uniform Rule, and Subchapter 3 of the Navajo Clean Air Act, 4 N.N.C. §§ 1151-56, as

well as by persons pursuant to 4 N.N.C. § 1156 and § 304 of the Clean Air Act.

The EPA Administrator retains full federal enforcement authority under the CAA. Violations of any applicable requirement, any permit term or condition, any fee or filing requirement, any duty to allow or carry out inspection, entry, or monitoring activities, or any regulations or order issued by NNEPA pursuant to this Part 71 delegation agreement are violations of the Act pursuant to 40 C.F.R. § 71.12.

Pursuant to the enforcement authority enumerated in Subchapter 3 of the Navajo Nation Clean Air Act, the Director may:

- a. restrain or enjoin immediately and effectively any person by order or by suit in court from engaging in any activity in violation of a permit that is presenting an imminent and substantial endangerment to the public health or welfare, or the environment;
- b. seek injunctive relief in tribal court to enjoin any violation of any program requirement, including permit conditions, without the necessity of a prior revocation of the permit;
- c. assess civil penalties or recover civil damages; and
- d. bring a criminal action in tribal court, under certain circumstances and for Indian defendants only.

Initially, however, NNEPA intends to work cooperatively with USEPA on any enforcement actions. By doing so, NNEPA expects to receive training and guidance and to develop expertise to prepare for enforcement under a Part 70 permit program. For example, NNEPA intends to inspect and conduct comprehensive compliance investigations in conjunction with USEPA of Part 71 facilities; such inspections and investigations will be performed in consistent with USEPA's Part 71 Compliance Monitoring Strategy policy. Facility inspections for all-Part 71 facilities will be conducted annually and Compliance Monitoring will be done semiannually through facility reporting and certification. Inspections will be conducted by NAQCP Compliance department personnel and/or Monitoring specialists utilizing necessary equipment for testing the emission source and traveling in assigned department vehicles to the inspection sites. Any noncompliance enforcement action will be conducted pursuant to the enforcement authority enumerated in Subchapter 3 of the Navajo Nation Clean Air Act and by the terms identified in the Delegation Agreement utilizing internal Tribal Department of Justice and/or external counsel resources as required in conjunction with US EPA Region IX.

Pursuant to 40 C.F.R. § 49.8, USEPA will continue to exercise primary criminal enforcement responsibility. NNEPA, however, will provide potential investigative leads to USEPA, as agreed to by NNEPA and EPA in a Memorandum of Agreement to be worked out between the parties. The Memorandum of Agreement will outline how NNEPA, upon becoming aware of possible criminal activity regarding compliance with the Part 71 Program, will notify the EPA Criminal Investigation Division of such activity as soon as possible, but in all instances no later than 30 days after discovery of the activity.

H. Current/Future Operating Expenses

The expected cost of administering the Navajo Delegated Part 71 Permit Program during the first year of delegation, in terms of FY 2005 dollars, is \$419,839.55. The estimated program costs and funding sources are shown in the table below:

Table 4. Fiscal Budget

Fiscal Year (Oct. 1 - Sept. 30)	Funding Sources			Program Expenses	
	Sept. 1, Fee	Apr. 1, Fee	Total Permit Fees	Personnel	Operating
	\$279,184.09	\$140,655.46	\$419,839.55	\$219,082.00	\$200,757.55

I. Permit Program Staff and Responsibilities

The following is a list of personnel, including their responsibilities, required to run the Navajo Delegated Part 71 Permit Program:

1. Environmental Department Manager
 - a. Assumes the supervisory responsibilities over permit program staff and overall administration of the Navajo Delegated Part 71 Operating Permit Program.
 - b. Provides guidance and develops strategies necessary to ensure the successful transition from a USEPA Part 71 Permit Program to a Navajo Delegated Part 71 Permit Program to an approved Navajo Part 70 Operating Permit Program.
 - c. Submit reports to USEPA Region 9 to meet the requirements of the Delegation Agreement and NNOPR.
 - d. Provides final approval of all draft permits in preparation for signature by the Executive Director.
 - e. Hires additional personnel for the permit program as needed.

2. Environmental Program Supervisor
 - a. Works closely and in cooperation with the Environmental Department Manager in running the permit program.
 - b. Provides assistance for the work on the primacy package.
 - c. Works closely with the technical staff on the daily operation of the permit program.
 - d. Develops the budget for the permit program.
 - e. Signs appropriate documents and correspondences pertaining to the regulated community.

3. Environmental Engineer
 - a. Responsible for the review, processing, drafting, and issuance of applicable permits.

- b. Conducts notice and comment activities on draft permits.
 - c. Works closely with Environmental Program Supervisor and Inspector on issues related to permit conditions and/or provisions.
 - d. Provides assistance, as needed, on enforcement actions.
4. Environmental Specialist
- a. Conducts periodic inspections of all facilities with title V permits subject to the authority of the Delegated Part 71 Permit Program.
 - b. Assembles, refers, and participates in cases for enforcement actions in cooperation with USEPA.
 - c. Submits reports (i.e., inspections, violations) of compliance and enforcement activities.
 - d. Observes source testing at facilities required to meet applicable standards (i.e., RATA, CEMs).
5. Information Technician
- a. Assumes all the duties and responsibilities of a network administrator and related work.
 - b. Performs hardware repair and software program support.
 - c. Maintains and updates hardware and software equipment.
 - d. Orders equipment as necessary.
6. Office Specialist
- a. Assumes all the secretarial and clerical duties associated with the permit program.
 - b. Works closely with the Environmental Program Supervisor (and staff) on administrative and personnel matters related to the permit program.
 - c. Assists the Environmental Engineer on activities related to notice-and-comment period for permits.

VI. Recruitment and Hiring of Permit Program Staff

NNEPA will be advertising and plans to hire additional staff to complete its current and future needs to administer a delegated Part 71 permit program and, ultimately, a Part 70 operating permit program. The following outlines NAQCP's plans for accomplishing this task.

- A. Create Staff Positions for Permit Program
 - 1. Establish positions for the permit program
 - a. Identify positions and number of personnel needed to administer the permit program.
 - b. Work with Navajo Nation Department of Personnel to create new job classifications for the permit program staff.
- This portion of the plan has already been accomplished.

2. Recruitment

- a. Announce positions through local university liaisons: Universities of New Mexico, Arizona, and Utah.
- b. Announce positions through specific professional trade sites, e.g., ITEP, AISES, State Environmental Departments. Announcements will begin in July 2004.
- c. Announce positions with the Navajo Nation Department of Personnel beginning on September 1, 2004.

This portion of the plan will continue until all the positions are filled.

B. Selection of Staff

1. The selection process will occur as soon as possible following the announcement of positions. Although the exact time will depend on when and the number of applicants referred to NNEPA, the selection of candidates should happen within four to six weeks after the vacancy announcements.
2. NNEPA will consider IPA personnel with USEPA or other governmental organizations when selecting permit program staff.

VII. Orientation and Training

A. New Staff

1. In accordance with the Navajo Nation Personnel Policy and Procedures, all new staff will undergo employee orientation and subject to a 90-day, probationary period.
2. Complete an additional administrative and personnel process.
3. Introduce new staff to NNEPA and receiving briefing on their roles and responsibilities within the permit program.

B. Training

1. Once the 90-day, probationary period has ended, new staff will have the opportunity to receive the training needed to support their respective roles in the permit program.

