NTAA Template Letter for Tribes on theProposed National Emission Standards for Hazardous Air Pollutants: Ethylene Oxide Emissions Standards for Sterilization Facilities Residual Risk and Technology Review

# *NOTE—**NTAA recommends that you begin your Tribe’s comment letter with introductory remarks regarding the signatory’s position with the Tribe. The more individualized the letter, the greater its potential impact. Feel free to add your own arguments or specific stories that will make this educational for the EPA. Be sure to replace all the highlighted text with your own text. The comment deadline is June 27, 2023, and comments can be submitted to the Federal Register*

# Docket ID No. EPA-HQ-OAR-2019-0178

# <https://www.epa.gov/hazardous-air-pollutants-ethylene-oxide/proposal-reduce-ethylene-oxide-emissions-commercial#:~:text=https%3A//www.regulations.gov/commenton/EPA%2DHQ%2DOAR%2D2019%2D0178%2D0154>

#  [DATE]

# Honorable Administrator Michael S. Regan

# U. S. Environmental Protection Agency

# Docket Center, OAR

# Mail Code 28221T

# 1200 Pennsylvania Avenue NW

# Washington, DC 20460

# Re: [INSERT TRIBE’S NAME HERE] Comments on the Proposed National Emission Standards for Hazardous Air Pollutants: Ethylene Oxide Emissions Standards for Sterilization Facilities Residual Risk and Technology Review

Dear Administrator Regan,

[INSERT TRIBE’S NAME HERE]is pleased to submit this letter to provide comments on the Environmental Protection Agency’s (EPA’s) proposed rules for EtO sterilizers. NTAA recommends that you begin your Tribe’s comment letter with introductory remarks regarding the signatory’s position with the Tribe.

[INSERT TRIBE’S NAME HERE] largely supports these proposed rules and the significant reductions in Hazardous Air Toxics that will result from these rules when fully implemented.

[INSERT TRIBE’S NAME HERE] believes this rule will significantly reduce the risks to fenceline communities across the country. The proposed rules will require controls achieving 99% emissions reductions from all subcategories of sources except for Room Air emissions sources group 2, existing area sources. In which case, EPA is proposing the less stringent of the two options that EPA deemed to be cost effective. We believe EPA should require option 1 which will achieve a greater level of emissions reduction and further reduce the risk to the fenceline communities.

[INSERT TRIBE’S NAME HERE] supports requiring the area sources to obtain Title V permits. The use of Continuous Emissions Monitoring to the greatest extent possible and the tightened record keeping and reporting requirements proposed in this rule.

[INSERT TRIBE’S NAME HERE] supports requiring the sources to conduct beyond fenceline monitoring to support a better understanding of the impacts and risks from emissions from these facilities on the surrounding communities.

In closing, thank you for the opportunity to comment on this important rulemaking. If you have any questions or seek clarification from the [INSERT TRIBAL NAME HERE], please do not hesitate to contact [INSERT TRIBAL CONTACT INFORMATION HERE].

Signed,

[INSERT NAME AND SIGNATURE OF TRIBAL LEADERSHIP HERE]