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Alaska Native Tribal Health
Consortium

March 7, 2023

Honorable Administrator Michael S. Regan
U. S. Environmental Protection Agency
Docket Center, OAR
Mail Code 28221T
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: U. S. Environmental Protection Agency proposed amendments to the Standards of Performance for New Stationary Sources and Emission Guidelines (EG) for Large Municipal Waste Combustors. Docket ID: EPA-HQ-OAR-2017-0183

Dear Honorable Administrator Regan,

The National Tribal Air Association (NTAA) is pleased to submit these comments regarding your proposal to amend Standards of Performance for New Stationary Sources and Emission Guidelines (EG) for Large Municipal Waste Combustors (LMWCs). 89 Fed. Reg. 4243 (Jan. 23, 2024).

The NTAA is a member-based organization with 156 Member Tribes. The organization’s mission is to advance air quality management policies and programs, consistent with the needs, interests, and unique legal status of American Indian Tribes and Alaskan Natives. As such, the NTAA uses its resources to support the efforts of all federally recognized Tribes in protecting and improving the air quality within their respective jurisdictions. Although the organization always seeks to represent consensus perspectives on any given issue, it is important to note that the views expressed by the NTAA may not be agreed upon by all Tribes. Further, it is also important to understand that interactions with the organization do not substitute for Nation-to-Nation consultation, which can only be achieved through direct communications between the federal government and American Indian Tribal Governments and Alaskan Natives.

NTAA members and staff attended your “virtual public hearing” on February 7, 2024, regarding this proposed rulemaking. These comments reflect the NTAA’s views that this proposed action is exceedingly important to sovereign Tribes and the millions of indigenous people who suffer from breathing unhealthy air because it will strengthen emission limitations of particulate matter, ozone



precursors, and multiple hazardous air pollutants (HAPs). Additionally, we are all threatened by climate change.

The NTAA has consistently urged the U. S. Environmental Protection Agency (USEPA), Congress, and states to do more to protect the health and quality of life of Native American Tribes and Alaskan Natives. Concurrently Tribes are doing their part to reduce emissions through responsible historical and contemporary solid waste management practices.

Tribes continue to suffer from unhealthful exposures to ozone, fine particulate matter (PM_{2.5}), and hazardous air pollutants. Climate change stimulated by emissions of greenhouse gases from many combustion sources including LMWCs impacts and threatens Tribal communities throughout the United States. This rule should be promulgated consistent with these concerns and commitments of Native American Tribes, Alaska Native Villages, and other populations impacted by LMWC air pollutant emissions.

The NTAA appreciates this opportunity to comment on this important proposal. We look forward to your agency's prompt promulgation of the improved LMWC rules as proposed. If you have any questions or require additional information from our organization, please contact NTAA's Project Manager, Carolyn Kelly at carolyn.kelly@nau.edu.

Respectfully,

Syndi Smallwood
Chair
National Tribal Air Association

Cc: Sharri Venno, R1 RTOC Tribal Co-Chair
Shavonne Smith, R2 RTOC Tribal Co-Chair
Dana Adkins, R3 RTOC Tribal Co-Chair
Jerry Cain, R4 RTOC Tribal Co-Chair
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