**National Tribal Air Association Template Letter on the U. S. EPA’s Proposed National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products Manufacture**

**NOTE:** *The NTAA recommends that you begin your comment letter with introductory remarks regarding the signatory’s position within 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 it educational for the EPA. Be sure to replace the highlighted text with your own text.*

*The comment deadline is* ***July 18, 2023****.*

*This proposed rule is a review for strengthening the requirements to reduce air toxics emissions from approximately 223 sawmills and facilities that manufacture a wide variety of veneer, plywood, oriented strand board, and other wood products. The rule applies only to facilities that are large enough to be classified as a “major source” of hazardous air pollutants. One or more of these facilities may be on or near your Tribal lands. The proposed rule is principally EPA’s response to successful litigation by environmental organizations. They also reflect advancements in manufacturing technologies and monitoring systems since the rule was first adopted in 2004. To the extent that these air pollution issues affect your Tribe, please include specific concerns.*

*Your comment letter can be submitted electronically to the Federal Rulemaking Portal.* <https://www.regulations.gov/> OR email to [a-r-Docket@epa.gov](mailto:a-r-Docket@epa.gov).

[DATE]

US Environmental Protection Agency

EPA Docket Center (EPA/DC)

Docket ID No. EPA-HQ-OAR-2023-0243

1200 Pennsylvania Avenue NW

Washington, DC 20460

RE: Comments from the **[INSERT TRIBE’S NAME HERE]** on EPA’s Proposed National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products Manufacture: Docket ID No. EPA-HQ-OAR-2023-0243

The **[INSERT TRIBE’S NAME HERE]** is pleased to submit these comments and recommendations regarding the U.S. Environmental Protection Agency’s (EPA’s) ProposedNational Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products Manufacture as published in the *Federal Register* on May 18, 2023.

***NOTE: If your Tribe has one or more of the 223 PCWP manufacturing facilities, please rewrite the following paragraph as appropriate.***

Forests, including their broader ecosystems, have sustained Native people for millennia. Some Tribal enterprises have been created to utilize forest resources on Tribal lands for commerce. Sawmills, and a wide range of associated wood product industries, are located in and near Tribal communities. While recognizing the economic benefits to some Tribal communities, the public health and environmental threats and impacts of the wood products’ industry remain a concern. As stated in the economic analysis for the proposed updated standards, “…the price of products from plywood manufacturing may fail to incorporate the full opportunity cost to society of consuming these products.”1 [**INSERT TRIBE’S NAME HERE]** supports the updates and strengthening of emissions requirements as proposed in the EPA’s National Emissions for Hazardous Air Pollutants (NESHAP) for Plywood and Composite Wood Manufacture facilities.

**Mercury**

Mercury contamination of ecosystems on Tribal lands and traditional sources of food presents an unacceptable and unnecessary risk to the health of Native people. Dryers and other process operations in the wood products industry can emit mercury, other toxic metals, and multiple organic and inorganic compounds. The proposal to strengthen emissions standards for these pollutants (from both new and existing sources) is important to reduce their impacts on our health and ecosystem sustainability.

**Organic Adhesives**

Many organic compounds are used as adhesives, binders, resins, etc. in the manufacture of plywood, oriented strand board, particle board, veneer, and other wood composites. When drying these agents, potential air pollutants are odorous, respiratory irritants, acutely toxic, and carcinogenic. Control technologies for minimizing these emissions are available and proven when properly installed, operated, and maintained. The proposed requirements to enhance monitoring and demonstrate continual compliance are appropriate and necessary.

**Emissions Averaging**

The existing compliance option of “emissions averaging” should be eliminated as proposed. To allow sources of hazardous air pollutants through “netting” emissions from multiple sources is inconsistent with the statutory intent to define and require Maximum Achievable Control Technology.

**Conclusions**

The **[INSERT TRIBE’S NAME HERE]** appreciates this opportunity to comment on the proposed amendments to the rule regarding National EmissionStandardsfor Hazardous Air Pollutants: Plywood and Composite Wood Products. We support the proposed rule and its potential to reduce the many harmful impacts of the many toxic organic and inorganic pollutants from these manufacturing facilities.

Respectfully submitted by

**[INSERT TRIBAL OFFICIAL’S NAME AND TITLE]**

1 *Economic Impact Analysis for the National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products Amendments*, EPA-45R/R-23-008, April 2023