**National Tribal Air Association Template Letter on The U. S. EPA’s Proposed National Emission Standards for Hazardous Air Pollutants: Coal- and Oil- Fired Electric Steam Generating Units Review of the Residual Risk and Technology Review**

**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.*

*This proposed rule is a review and aims to strengthen the requirements to reduce air toxics emissions from fossil fuel – burning power plants. It largely reflects recent advancements in technologies that can be installed for controlling these pollutants, including mercury. It also is one additional initiative that will facilitate the nation’s transition to renewable generation of electricity. To the extent that these air pollution issues affect your Tribe, please include specific concerns.*

*The comment deadline is* ***June 23, 2023.***  *Your comment letter can be submitted electronically to the Federal Rulemaking Portal.* <https://www.regulations.gov/> OR email to a-r-Docket@epa.gov.

 [DATE]

US Environmental Protection Agency

EPA Docket Center (EPA/DC)

Docket ID No. EPA-HQ-OAR-2018-0794

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: Coal- and Oil- Fired Electric Steam Generating Units Review of the Residual Risk and Technology Review: Docket ID No. EPA-HQ-OAR-2018-0794

The **[INSERT TRIBE’S NAME HERE]** is pleased to submit these comments and recommendations regarding the U.S. Environmental Protection Agency’s (EPA’s) Proposed National Emission Standards for Hazardous Air Pollutants: Coal- and Oil- Fired Electric Steam Generating Units Review of the Residual Risk and Technology as published in the *Federal Register* on April 24, 2023.

The health, environments, and lifeways of Tribes in much of the U.S., including **[INSERT TRIBE’S NAME HERE]** have been impacted by emissions of mercury and other toxic metals. Electric power generation from coal-fired and oil-fired boilers has been a major contributor to this airborne pollution. Concurrently, these same pollution sources emit acid gases, greenhouse gases, and other harmful air pollutants. The **[INSERT TRIBE’S NAME HERE]** has supported regulations to reduce emissions from fossil fuel combustion and the transition to electricity generation from renewable sources. With this letter we continue that advocacy and support for the proposed regulation as proposed on April 24.

American Indians and Alaska Native Villagers are reliant on natural food supplies including fish, game, and native plants. Nutritious foods are crucial components to the ecosystems that have sustained life for thousands of years. Mercury contamination of Tribal environments including fish, shellfish and other essential food supplies injects this potent neurotoxin into our vulnerable populations. The **[INSERT TRIBE’S NAME HERE]** supports the proposed reduction of allowable mercury emissions from lignite – burning electric generating units (EGUs) and enhanced emissions monitoring from all coal – fired and oil – fired EGUs.

Fossil fuels, and coal and oil more specifically, contain multiple impurities that, when released into the environment, can cause significant adverse effects to human health and other life forms. Arsenic, chromium, cobalt, and lead, commonly found in coal, are potent threats to human health. Acid gases formed from chlorine and fluorine are insidious with multiple harmful effects. The **[INSERT TRIBE’S NAME HERE]** supports the proposal for more stringent controls of the emissions from coal – fired and oil – fired EGUs through limits on fine particulate matter (fPM). To the extent that these hazardous air pollutants are not addressed adequately through this surrogate regulation, additional requirements may be necessary.

As noted in the *Fact Sheet* accompanying the proposed regulation, “…the proposed rule is one part of a broader suite of actions that Administrator Regan announced in March 2022 to protect communities across the nation from the various health and environmental impacts of power plant pollution.” In addition to mercury and other air toxins from coal – fired and oil – fired EGUs, this industrial sector is a primary source of greenhouse gases. The acute and continuous impacts of climate change on Native Americans and Alaska Native Villagers are well documented. Unfortunately, new consequences of this global crisis continue to be revealed. For multiple reasons including vulnerability and geographic constraints, Tribal communities are disproportionately suffering from these changes.

The acute and continuous impacts of climate change on **[INSERT TRIBE’S NAME HERE]** are well documented. Unfortunately, new consequences of this global crisis continue to be revealed. The ravages of climate change continue to be of utmost concern to the **[INSERT TRIBE’S NAME HERE].** We support this proposed regulation as one part of efforts to reduce reliance on coal – fired and oil – fired EGUs.

In conclusion, the [**INSERT TRIBE’S NAME HERE]** supports this importantset of proposed regulations regarding air pollution emissions from coal – fired and oil – fired electric steam generating units and their potential to reduce the many harmful impacts of mercury and other airborne toxins.

Respectfully submitted by

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