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Alaska Native Tribal Health  
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March 8, 2024

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

Re: NTAA comments regarding the U.S. Environmental Protection Agency  
proposal to amend the National Emission Standards for Hazardous Air Pollutants:  
Lime Manufacturing Plants Amendments. *See* 89 Fed. Reg. 9088 (Feb. 9, 2024).  
Docket ID: EPA-HQ-OAR-2017-0015.

Dear Honorable Administrator Regan,

The National Tribal Air Association (NTAA) is pleased to submit this letter to  
provide comments on the U.S. Environmental Protection Agency's (EPA) proposal  
to amend the National Emission Standards for Hazardous Air Pollutants: Lime  
Manufacturing Plants Amendments. *See* 89 Fed. Reg. 9088 (Feb. 9, 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 and  
Alaskan Native Tribes. 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.

Tribes and Tribal members continue to suffer from unhealthful exposures from  
mercury and other hazardous air pollutants. NTAA therefore is pleased to write in  
support of this rule which proposes to strengthen the air emissions standards  
applicable to lime manufacturing.

Although the EPA is unaware of any lime manufacturing facilities owned or  
operated by Tribal governments, 89 Fed. Reg. at 9102, air pollution does not respect  
jurisdictional boundaries and reducing hazardous air pollution beneficially affects



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all communities. According to the demographic analysis in the EPA's docket, as of 2018 over 60,000 people identifying as Native American live within 50 km of any lime facility,<sup>1</sup> suggesting that members of many different Tribes' members may be affected by the emissions reductions proposed in these rules.

In closing, thank you for the opportunity to comment on this important proposal. The NTAA looks forward to the EPA's prompt promulgation of the updated emission standards as proposed.

Respectfully,

Syndi Smallwood,  
Chair  
National Tribal Air Association

Cc: Sharri Venno, R1 RTOC Tribal Co-Chair  
Shavonne Smith, R2 RTOC Tribal Co-Chair  
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Jerry Cain, R4 RTOC Tribal Co-Chair  
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Roman Orona, R9 RTOC Tribal Co-Chair  
Raymond Paddock, III, R10 RTOC Co-Chair  
Pat Childers, Senior Tribal Program Coordinator, OAR  
Carolyn Kelly, Program Manager, NTAA

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<sup>1</sup> SC&A Incorporated, Risk and Technology Review - Analysis of Demographic Factors for Populations Living Near Lime Manufacturing Source Category Operations at A-1 (Aug. 16, 2018), available in EPA Docket EPA-HQ-OAR-2017-0015.