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November 19, 2021

George Bridgers
OAQPS-AQAD-Air Quality Modeling Group
U.S. EPA Office of Air Quality Planning & Standards

Re: Comments on the Environmental Protection Agency (EPA) Office of Air and Radiation's (OAR) Revised DRAFT Guidance for Ozone and Fine Particulate Matter (PM) Permit Modeling Docket Number EPA-HQ-OA-2021-

Hello Mr. Bridgers:

The National Tribal Air Association (NTAA) is pleased to submit this letter in response to your invitation to provide comments on the Environmental Protection Agency's (EPA's) Revised DRAFT Guidance for Ozone and Fine Particulate Matter (PM) Permit Modeling.

The NTAA is a member-based organization with 153 principal 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 Indian 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 interactions with the organization do not substitute for government-to-government consultation, which can only be achieved through direct communications between the federal government and Indian Tribes.

NTAA appreciates the effort to address comments provided on the previous proposed guidance, and strengthen the modeling guidance to provide more conservative and protective assessments required for new or modified sources of Ozone and PM. NTAA also appreciates EPA's ongoing work to meet Executive Order 13990, Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis. NTAA agrees more comprehensive assessment of the both the precursors of Ozone and the direct emissions, and the precursors of PM is important to ensure that air quality and public health are protected.

NTAA appreciates that the Agency has modified the guidance for sources to make the required demonstration that the allowable emissions increase from a source or modification would not cause or contribute to any NAAQS or PSD increment violation. NTAA agrees that to make this demonstration, sources should provide a



full accounting of the combined impacts of their allowable precursor (and direct component, in the case of PM_{2.5}) emissions on ambient concentrations of

the relevant NAAQS (i.e., O₃ or PM_{2.5}) if any precursor(s) (or the direct component, in the case of PM_{2.5}) would be emitted in a significant amount.

The 2020 draft guidance relied upon a “Pollutant Applicability” approach that stated the PSD requirements for a compliance demonstration only applied to regulated NSR pollutants that would be emitted in a significant amount. This allowed the source to look only at emissions of individual O₃ and PM_{2.5} precursors/pollutants (i.e., NO_x, VOC, SO₂, and direct PM_{2.5}) and NOT sum them when determining a significant emission increase for either criteria pollutant, such that only the component of O₃ and PM_{2.5} that would by themselves be emitted by a new or modifying source in a significant amount would be included in the air quality analysis.

This revised guidance requires sources to make the required demonstration and sources should provide a full accounting of the combined impacts of their allowable precursor (and direct component, in the case of PM_{2.5}) emissions on ambient concentrations of the relevant NAAQS (i.e., O₃ or PM_{2.5}) if any precursor(s) (or the direct component, in the case of PM_{2.5}) would be emitted in a significant amount. NTAA agrees with EPA that this approach is supported both scientifically and legally.

The NTAA appreciates this opportunity to comment on this draft guidance. If you have any questions or require clarification from the NTAA please do not hesitate to contact the NTAA’s Project Director Andy Bessler at 928-523-0526 or Andy.Bessler@nau.edu.

On Behalf of the NTAA Executive Committee,

A handwritten signature in blue ink that reads "Carol a Kriebs".

Carol Kriebs
Chairwoman
National Tribal Air Association
Executive Committee