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National Tribal Air Association

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June 13, 2014

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Reid J. Rosnick
Office of Radiation and Indoor Air
Radiation Protection Division
U.S. Environmental Protection Agency
Via email to rosnick.reid@epa.gov

Dear Mr. Rosnick,

The National Tribal Air Association (NTAA) is an autonomous organization with 80 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.

On behalf of the NTAA, I am writing to request that EPA extend the public comment period for the proposed rule issued in the Federal Register on May 2, 2014, which would revise Subpart W of 40 CFR Part 61, "*National Emission Standards for Operating Uranium Mill Tailings*". Specifically, the NTAA is requesting the maximum comment extension period of 120 days.

This rule addresses both conventional uranium milling operations as well as future extraction activities, namely in-situ leach/recovery (ISL) sites. Domestic uranium milling and mining operations to date have left in their wake a disturbing legacy of environmental injustice in Indian Country. As a national organization whose mission it is to advance air quality management and policies for federally recognized Tribes, it is only prudent that NTAA thoroughly evaluate the consequences of the proposed rule, including the potential impacts on Tribal communities, and subsequently provide comments to EPA. Given the serious complexity of the proposed rule, as well as the wide ranging implications for affected Tribes, we strongly request that you grant the aforementioned extension.

For our part, NTAA was only made aware of the proposed rule within the last two weeks. The public comment extension will help to promote a just and equitable public participation process by giving the NTAA, member Tribes, and those Tribes indicated on EPA's consultation list adequate time to examine the complex science and the associated human health considerations embodied in the proposed rule.

Sincerely,

Bill Thompson
Chairman, NTAA