***NATIONAL TRIBAL AIR ASSOCIATION (NTAA) TEMPLATE LETTER FROM TRIBAL LEADER TO USEPA***

*NOTE—NTAA recommends that you begin your Tribe’s comment letter with introductory remarks regarding the signatory’s position with 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 this educational for the EPA. Be sure to replace all the highlighted text with your own text. The comment deadline is* ***November 19, 2021****, and comments can be submitted directly to George Bridgers at*[*bridgers.george@epa.gov*](mailto:bridgers.george@epa.gov)*.*

George Bridgers

OAQPS-AQAD-Air Quality Modeling Group

U.S. EPA Office of Air Quality Planning & Standards

**Re:** [TRIBAL NAME] **Comments on the Environmental Protection Agency (EPA) Office of Air and Radiation’s (OAR) Revised DRAFT Guidance for Ozone and Fine Particulate Matter (PM) Permit Modeling Docket Number EPA-HQ-OA-2021-**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 [TRIBAL NAME] 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this letter in response to your invitation to provide comments on the Environmental Protection Agency’s (EPA’s) Revised DRAFT Guidance for Ozone and Fine Particulate Matter (PM) Permit Modeling.

INSERT INTRODUCTION TO WHO YOU/YOUR TRIBE ARE. PERSONALIZE THIS PART AS MUCH AS YOU CAN AND INCLUDE ANY HISTORY YOU HAVE HAD WITH OZONE AND FINE PARTICULATE MATTER (PM) PERMIT MODELING

The [TRIBAL NAME] 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. The [TRIBAL NAME] 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. The [TRIBAL NAME] 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.

The [TRIBAL NAME] 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. The [TRIBAL NAME] 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 PM2.5) emissions on ambient concentrations of the relevant NAAQS (i.e., O3 or PM2.5) if any precursor(s) (or the direct component, in the case of PM2.5) 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 PM2.5 precursors/pollutants (i.e., NOX, VOC, SO2, and direct PM2.5) and NOT sum them when determining a significant emission increase for either criteria pollutant, such that only the component of O3 and PM2.5 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 PM2.5) emissions on ambient concentrations of the relevant NAAQS (i.e., O3 or PM2.5) if any precursor(s) (or the direct component, in the case of PM2.5) would be emitted in a significant amount. The [TRIBAL NAME] agrees with EPA that this approach is supported both scientifically and legally.

The [TRIBAL NAME] appreciates this opportunity to comment on this draft guidance. If you have any questions or require clarification from the [INSERT TRIBAL CONTACT INFORMATION HERE]

On Behalf of the [TRIBAL NAME]

[INSERT NAME AND SUGNATURE OF TRIBAL LEADERSHIP HERE]