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Ida Clark
Alaska Native Tribal Health
Consortium

July 12, 2023

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 on the Proposed National Emission Standards for
Hazardous Air Pollutants: Plywood and Composite Wood Products Manufacture
Docket ID No. EPA-HQ-OAR-2023-0243

Dear Honorable Administrator Regan,

The National Tribal Air Association (NTAA) is pleased to submit comments on the Environmental Protection Agency's (EPA) proposal: National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Manufacture as published in the Federal Register on May 18, 2023.

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 Tribes and Alaskan Natives. 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.

Forests, including their broader ecosystems, have sustained Native people for millennia. Some Tribal enterprises have been created to utilize forest resources on Tribal lands for commerce. Sawmills, and a wide range of associated wood product industries, are located in and near Tribal communities. While recognizing the economic benefits to some Tribal communities, the public health and environmental threats and impacts of the wood products' industry remain a concern. As stated in the economic analysis for the proposed updated standards, "...the price of products from plywood manufacturing may fail to incorporate the



full opportunity cost to society of consuming these products.”¹ The NTAA supports the updates and strengthening of emissions requirements as proposed in EPA’s National Emissions for Hazardous Air Pollutants (NESHAP) for Plywood and Composite Wood Manufacture facilities.

Mercury

Mercury contamination of ecosystems on Tribal lands and traditional sources of food presents an unacceptable and unnecessary risk to the health of Native people. Dryers and other process operations in the wood products industry can emit mercury, other toxic metals, and multiple organic and inorganic compounds. The proposal to strengthen emissions standards for these pollutants (from both new and existing sources) is important to reduce their impacts on our health and ecosystem sustainability.

Organic Adhesives

Many organic compounds are used as adhesives, binders, resins, etc. in the manufacture of plywood, oriented strand board, particle board, veneer, and other wood composites. When drying these agents, potential air pollutants are odorous, respiratory irritants, acutely toxic, and carcinogenic. Control technologies for minimizing these emissions are available and proven when properly installed, operated, and maintained. The proposed requirements to enhance monitoring and demonstrate continual compliance are appropriate and necessary.

Emissions Averaging

The existing compliance option of “emissions averaging” should be eliminated as proposed. To allow sources of hazardous air pollutants through “netting” emissions from multiple sources is inconsistent with the statutory intent to define and require Maximum Achievable Control Technology.

Conclusions

The NTAA appreciates this opportunity to comment on the proposed amendments to the rule regarding National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products. We support the proposed rule and its potential to reduce the many harmful impacts of the many toxic organic and inorganic pollutants from these manufacturing facilities.

Respectfully,

Syndi Smallwood

Chair

Executive Committee, National Tribal Air Association

¹ Economic Impact Analysis for the National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products Amendments, EPA-45R/R-23-008, April 2023

www.NTAATribalAir.org

928.523.0526 office

928.523.1266 fax



National Tribal Air Association

P.O. Box 15004

Flagstaff, AZ 86011-5004

Cc: Pat Childers, Senior Tribal Program Coordinator, OAR
Carolyn Kelly, Program Manager, NTAA