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January 16, 2025

Jane Nishida  
Acting Administrator  
U. S. Environmental Protection Agency  
Docket Center, Docket ID No. EPA-HQ-OAR-2024-0419  
Mail Code 28221T  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

Re: Proposal to Strengthen the New Source Performance Standards for Stationary Combustion Turbines Docket ID No. EPA-HQ-OAR-2024-0419

Dear Acting Administrator Nishida,

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 Strengthen the New Source Performance Standards for Stationary Combustion Turbines*.

The NTAA is a member-based organization with 160 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 Natives 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.

The NTAA supports rigorous New Source Performance Standards for combustion turbines. Emissions of nitrogen oxides and greenhouse gases from these sources pose many threats to native peoples, Tribal lands, and environments. Tribal communities currently are exposed to unhealthy levels of ozone and PM<sub>2.5</sub>, both of which are attributable, in part, to anthropogenic emissions of nitrogen oxides. Residents on



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Tribal lands suffer from acute and chronic respiratory diseases associated with inhalation of these pollutants. Tribal lands, crops, and ecosystems are vulnerable to acidification caused by NOx and other acid gases. Nitrate particles contribute to regional haze with associated impaired views of vistas and sacred mountains. The purported “benefits” and “disbenefits” of the proposed standards must consider the many threats and impacts of increased emissions from gas turbines.

The NTAA is acutely aware of the recent and anticipated continuing proliferation of new gas turbines. This includes units located on and near Tribal lands. Such facilities pose acute threats to public health as well as regional and global impacts including ozone, photochemical smog, acid precipitation, and tropospheric nitrates. The current and extensive multi-tiered approach to regulating emissions from these sources (capacity, utilization, etc.) should be simplified. In general, optimum combustion controls systems and post combustion selective catalytic reduction should be required unless the source proponent demonstrates both impracticality and enforceability of alternative emissions limitations. Both technological and operational advancements have occurred since the most recent NSPS requirements were promulgated in 2006.

In closing, the NTAA appreciates the opportunity to submit these comments and looks forward to further work with EPA on this important issue. If you have any questions or require clarification from the NTAA, please do not hesitate to contact the NTAA’s Program Manager, Miranda O’Neill [miranda.oneill@nau.edu](mailto:miranda.oneill@nau.edu) or at 928.523.9701.

Respectfully,

Syndi Smallwood  
Chair  
National Tribal Air Association

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