

April 22, 2021

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Joseph Goffman
Acting Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Mr. Goffman:

On behalf of the National Association of Clean Air Agencies (NACAA),¹ we submit the following comments regarding the 2017 National Air Toxics Assessment (NATA). We recently were surprised to learn that EPA currently does not plan to release the 2017 NATA data and we are requesting that the agency reconsider this decision and complete and release this valuable assessment as soon as possible.

We understand that, instead of releasing the 2017 NATA, EPA plans to consider other ways of providing similar types of information in the future that are timelier and more streamlined. We recognize that the process of gathering the emission inventory and conducting the modeling for NATA is time consuming and resource intensive and results in a wait of several years for the data to be final, which is too long. We agree that a more expeditious approach is necessary. However, until a new system is developed and the information is made available, it is critically important that we continue to have updates to the NATA data. It is the best, most complete assessment of hazardous air pollution (HAP) human health risk that is available to many air quality agencies and the public. Without the 2017 NATA they have been expecting, they will be left using 2014 data, which is far too outdated.

For many years, NATA has provided essential data on which state and local air quality agencies and the public have come to rely heavily. There are many features of the NATA data that have been extremely beneficial, including valuable information for assessing and addressing HAP risks in environmental justice communities; information on diesel particulate matter, much of which is not

¹NACAA is the national, nonpartisan, non-profit association of air pollution control agencies in 41 states, including 115 local air agencies, the District of Columbia and four territories. The air quality professionals in our member agencies have vast experience dedicated to improving air quality in the U.S. These comments are based upon that experience. The views expressed in these comments do not represent the positions of every state and local air pollution control agency in the country.

available elsewhere; tools for communicating with the public about HAP-related exposures and health risks; estimates for areas without HAP monitoring data; levels of background concentrations and cumulative risks; and maps that enable a visualization of hot spots and offer a regional and national perspective.

It is important to note that the 2014 NATA analysis of exposures and risks from air toxics is incorporated in EPA's EJScreen (environmental justice screening and mapping tool), which is widely used by state and local agencies to assess disproportionate environmental impacts. Without the 2017 NATA data, EJScreen would continue to use the outdated 2014 NATA analysis, which would be in contradiction to the urgency that the Biden administration and many state and local agencies have placed on environmental justice. NATA is also widely used by city and county governments for making decisions about risk and communicating risk information to the general public.

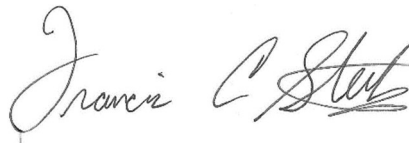
As long-time users of NATA, the members of NACAA would be happy to provide input to EPA as the agency develops a more streamlined system to replace NATA that would be timely and equally useful (e.g., including information of the same granularity). In the meantime, however, we strongly urge EPA to complete and release the 2017 NATA data as soon as possible.

Thank you for your consideration. Please do not hesitate to contact us or Mary Sullivan Douglas of NACAA at mdouglas@4cleanair.org if you have questions or wish to discuss this further.

Sincerely,



Latrice Babin, PhD
Harris County, Texas
Co-Chair
NACAA Air Toxics Committee



Francis C. Steitz
New Jersey
Co-Chair
NACAA Air Toxics Committee

cc: Peter Tsigotis, Director, EPA Office of Air Quality Planning and Standards