

Pathways to Developing Tribal Environmental Programs

GAP TECHNICAL ASSISTANCE

EPA AMERICAN INDIAN ENVIRONMENTAL OFFICE

Introduction

Several comments received in the 2018 GAP Guidance Evaluation consultation suggested the indicators in the 2013 GAP Guidance Appendix 1, Guidebook for Building Tribal Environmental Program Capacity, provide a beneficial and comprehensive roadmap toward tribal environmental program development. In response, the EPA American Indian Environmental Office (AIEO) in the Office of International and Tribal Affairs (OITA) is proposing to repackage the list of indicators identified in Appendix 1 as a technical assistance resource for Tribes and intertribal consortia.

The following information is a draft Clean Air Act Chapter as an example of how the technical assistance could look and the type of information that may be included. Tribes and intertribal consortia are encouraged to provide feedback on the use and further development of this technical assistance resource during the April 4 – August 2, 2022, consultation and coordination on the DRAFT 2022 GAP Guidance.

Additional content will be added and finalized by October 1, 2022.

EPA acknowledges that building capacity is not always a linear process for Tribes. Given the vast and well-documented disparities that Tribes may experience, Tribal environmental staff often contend with significant challenges above and beyond the status quo for designated environmental authorities. Tribal environmental staff are often both overburdened and under resourced, starting and working from behind. EPA recognizes that there may be setbacks and unforeseen issues toward which Tribes need to focus their efforts and that planned objectives may vary as a result.

Clean Air Program Development Areas - Checklist

The checklists in the tables are intended to assist Tribes in developing programs under the Clean Air Act. These tables include pathways for four separate air programs:

- Outdoor Air Quality
- Radon
- Other Emissions/Pollution Source Control
- Climate

The first stages of each of these programs include establishing agreements, receiving funding, and training Tribal staff through trainings and workshops sponsored by EPA and other organizations on air monitoring and program implementation topics, or through written guidance provided by EPA and others. Following training, Tribal staff can complete several activities including conducting community outreach, developing program strategies, baselining, and conducting monitoring and inventories. Tribes may also choose to establish Tribal laws or codes.

While Tribes may ultimately seek TAS, which may be preceded by a test drive, in many cases Tribes may not choose to pursue TAS as an end goal for managing an environmental program area. These tables of capacity indicators are organized by statute. While they are structured in such a way to help Tribes develop plans that build on previous activities as programs mature, they are not meant to imply that all Tribes will pursue TAS.

There are 4 tables below and each table focuses on a different Clean Air Act program area. Within each table, there are different development areas and suggested actions that may be taken relative to that development area. Some of the actions are taken directly from the DRAFT 2022 GAP capacity indicator list. Other actions or activities are not pulled from the 2022 GAP capacity indicator list but are important steps that a Tribe may want to take when developing their environmental program. While each development area is meant to build on the previous development area, the activities within each area are generally able to be completed interchangeably at a Tribe’s discretion. Additionally, Tribes may choose not to pursue or complete some of the activities in a given development area. Choosing not to pursue or complete an activity does not preclude the Tribe from moving to activities in a different area. These tables are meant only to assist Tribes with internal tribal environmental planning, and Tribes may use them outside of this linear structure as needed.

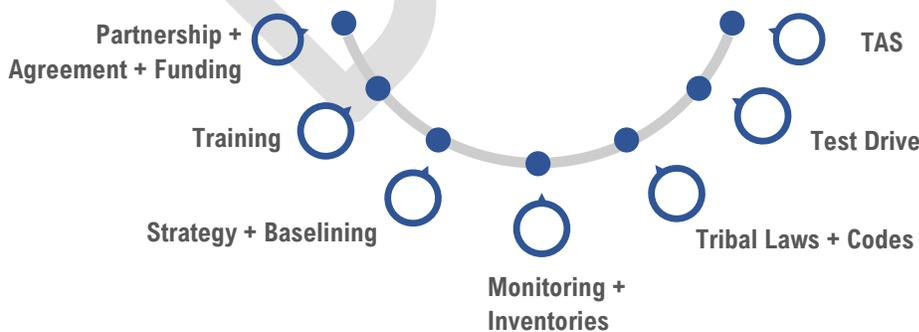


Figure 1. Depiction of development areas for capacity indicators under the Clean Air Act.

Color key information for Tables 1-4:

- Unshaded cells are capacity indicators that will be published alongside the 2022 GAP Guidance.
- Yellow shaded cells are indicators that were included in the 2013 GAP Guidance and signify intermediate actions that bridge two development areas. These are not indicators in the 2022 GAP Guidance but are important steps for developing Tribal capacity.
- Blue shaded cells within a development area signify that the action comes from the 2013 GAP Guidance and is important for developing capacity within a development area. These are not indicators in the 2022 GAP Guidance.

Table 1. Tool for tracking air quality indicators and intermediate actions for capacity development under the Clean Air Act.

Development Area	Action	Is this a Tribal Priority?	Not Started	In Progress	Complete
<i>Air Quality</i>					
Partnership + Agreement + Funding	Tribe is receiving funding under the CAA or other related EPA media specific program.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Tribe is establishing an intergovernmental agreement (MOU/MOA).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Tribe is establishing a cooperative agreement to conduct monitoring/inspections.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>Tribe has established a staffing plan (position description and recruitment/retention/promotion plan) for who will serve as Tribal air quality/indoor air quality program coordinator(s).</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Training	Tribal staff are obtaining program-specific certification, including Air pollution Control Support Systems/105 and 103 Training.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Strategy + Baselineing	Tribe is developing an air monitoring strategy.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Tribe is developing a quality assurance project plan.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Tribe is developing a report analyzing air quality issues impacting the Tribe and evaluated air pollution control options (identifies air pollution sources and known levels of emissions, defines potential human health and environmental impacts of current air quality, and provides recommendations for action).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Development Area	Action	Is this a Tribal Priority?	Not Started	In Progress	Complete
Air Quality					
<i>Tribe has established a program to collect and upload quality assured ambient air monitoring data into the Air Quality System (AQS) database.</i>					
Monitoring + Inventories	Tribe is establishing an air quality monitoring program (i.e., submitting data to AQS or doing regulatory monitoring).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Tribe has completed an indoor air quality assessment and report.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Tribe has established a program to meaningfully participate in air quality management programs administered by other Tribal, federal, state, or local governments (including reviewing and commenting on air quality standards and facility permit actions).</i>					
Tribal Laws + Codes	Tribe is developing a program to provide compliance assurance (including inspections).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Tribe has incorporated indoor air quality improvements or features as part of building renovation programs (e.g., weatherization and rehabilitation) and new construction.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Tribe is establishing a comprehensive air quality permitting system that meets the minimum elements required by 40 CFR Part 70.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Tribe is developing/preparing to enact ambient air quality laws, codes, and/or regulations with effective compliance assurance and enforcement provisions that are at least as stringent as the federal statutes.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Tribe is establishing a program to assist EPA with implementing the federal CAA program (e.g., assisting the Agency to develop/update an inventory of regulated entities, compliance assistance activities for regulated entities, obtaining federal inspection credentials to inspect regulated entities, and assisting EPA to draft permits for regulated entities).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Development Area	Action	Is this a Tribal Priority?	Not Started	In Progress	Complete
<i>Air Quality</i>					
	Tribe is developing air quality codes, such as laws that address air quality concerns that do not have standards/rules/provisions in the CAA including addressing odors, speed limits to minimize road dust/fugitive emissions, limiting activities or emissions at industrial sources during wildfire events/air pollution episodes, prohibiting smoking in facilities (IAQ) and code related to agricultural activities.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Test Drive	CAA § 111 - New Source Performance Standards (NSPS)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	CAA § 110 – Tribal Implementation Plan (TIP)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	CAA Title V – Operating Permit Program	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Permit Action Notification and Petition	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	CAA § 112 – National Emissions Standards for Hazardous Air Pollutants (NESHAP)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TAS	CAA § 111 - New Source Performance Standards (NSPS)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	CAA § 110 – Tribal Implementation Plan (TIP)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	CAA Title V – Operating Permit Program	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Permit Action Notification and Petition	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	CAA § 112 – National Emissions Standards for Hazardous Air Pollutants (NESHAP)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Table 2. Tool for tracking radon indicators and intermediate actions for capacity development under the Clean Air Act.

Development Area	Action	Is this a Tribal Priority?	Not Started	In Progress	Complete
<i>Radon</i>					
Partnership + Agreement + Funding	Tribe is receiving funding under the CAA or other related EPA media specific program.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Tribe is establishing an intergovernmental agreement (MOU/MOA).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Training	N/A	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Development Area	Action	Is this a Tribal Priority?	Not Started	In Progress	Complete
Radon					
Strategy + Baselineing	Tribe is developing a quality assurance project plan.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Monitoring + Inventories	Tribe is developing a program to provide compliance assurance (including inspections).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>Tribe has prepared a report recommending actions to improve indoor air quality and reduce levels for radon, mold, moisture, and environmental pollutants.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tribal Laws + Codes	Tribe is enacting green building codes, guidelines and/or protocols that promote healthier indoor air quality and apply these practices to new and retrofitted buildings.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Tribe is enacting indoor air quality laws, codes, and/or regulations with effective compliance assurance and enforcement provisions.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Tribe is adopting EPA's recommended standards and techniques for controlling radon levels within buildings.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Tribe is establishing a radon program.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Test Drive	New Source Performance Standards (NSPS)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	CAA § 110 – Tribal Implementation Plan (TIP)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	CAA Title V – Operating Permit Program	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	National Emissions Standards for Hazardous Air Pollutants (NESHAP)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TAS	CAA § 111 - New Source Performance Standards (NSPS)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	CAA § 110 – Tribal Implementation Plan (TIP)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	CAA Title V – Operating Permit Program	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	CAA § 112 – National Emissions Standards for Hazardous Air Pollutants (NESHAP)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Table 3. Tool for tracking other emission and pollution sources indicators and intermediate actions for capacity development under the Clean Air Act.

Development Area	Action	Is this a Tribal Priority?	Not Started	In Progress	Complete
<i>Other Emission + Pollution Sources</i>					
Partnership + Agreement + Funding	Tribe is receiving funding (i.e., 105 funding) for planning, developing, establishing, improving, and maintaining adequate Air Pollution Control Support programs.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Tribe is establishing an intergovernmental agreement (MOU/MOA).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Tribe is establishing a cooperative agreement to conduct monitoring/inspections.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Training	Staff has completed appropriate indoor air quality training and acquired skills related to indoor air quality (e.g., Healthy Homes training).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Tribal staff are obtaining program-specific certification, including Air pollution Control Support Systems/105 and 103 Training.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Tribe is developing a program for administering the noncompliance penalty program under section 120 of the Clean Air Act.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Strategy + Baselineing	Tribe is preparing a plan providing for attainment and maintenance of national standards and a control strategy that meets requirements laid out in 40 CFR Part 51.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Tribe is preparing a plan for hazardous air pollutants for source categories.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Tribe is preparing a plan for control of designated facilities and pollutants.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Tribe is developing an air monitoring strategy.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Tribe is developing a report analyzing air quality issues impacting the Tribe and evaluated air pollution control options (identifies air pollution sources and known levels of emissions, defines potential human health and environmental impacts of current air quality, and provides recommendations for action).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Tribe is developing a quality assurance project plan.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Development Area	Action	Is this a Tribal Priority?	Not Started	In Progress	Complete
<i>Other Emission + Pollution Sources</i>					
Monitoring+ Inventories	Tribe is inventorying emission sources to report to EPA.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Tribe has completed an emissions inventory and submitted to the National Emissions Inventory Database.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tribal Laws + Codes	Tribe is developing a program to provide compliance assurance (including inspections).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Tribe has established a Diesel Emissions Reduction Program (identified diesel engine use; evaluated short- and long-term priorities for reduction of emissions; selected implementation options such as installing diesel retrofit devices with verified technologies on school buses, maintaining/repairing/rebuilding engines, replacing older vehicles/equipment with more efficient engines or engines that run on cleaner fuel, improve operational strategies).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Tribe has established energy efficiency policies and program(s) (e.g., building design standards/codes, ENERGY STAR initiatives for government operations and Tribal housing).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Tribe has established an air toxics program (capacity to: monitor for acid and mercury deposition; sample subsistence food sources to measure the accumulation of toxics; partner with other jurisdictions on assessment projects; communicate potential threats to community members; implement actions to reduce sources of air toxics pollution).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Test Drive	CAA § 111 - New Source Performance Standards (NSPS)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	CAA § 110 – Tribal Implementation Plan (TIP)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	CAA Title V – Operating Permit Program	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Permit Action Notification and Petition	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	CAA § 112 – National Emissions Standards for Hazardous Air Pollutants (NESHAP)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Development Area	Action	Is this a Tribal Priority?	Not Started	In Progress	Complete
<i>Other Emission + Pollution Sources</i>					
TAS	CAA § 111 - New Source Performance Standards (NSPS)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	CAA § 110 – Tribal Implementation Plan (TIP)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	CAA Title V – Operating Permit Program Permit Action Notification and Petition	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	CAA § 112 – National Emissions Standards for Hazardous Air Pollutants (NESHAP)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DRAFT

Table 4. Tool for tracking climate indicators and intermediate actions for capacity development under the Clean Air Act.

Development Area	Action	Is this a Tribal Priority?	Not Started	In Progress	Complete
<i>Climate</i>					
Partnership + Agreement + Funding	Tribe is receiving funding under the CAA or other related EPA media specific program.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Tribe is establishing an intergovernmental agreement (MOU/MOA).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Tribe is establishing a cooperative agreement to conduct monitoring/inspections.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Training	Tribal staff are obtaining program-specific certification, including Air pollution Control Support Systems/105 and 103 Training.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Strategy + Baselineing	Tribe has developed a climate change preparedness/adaptation program (e.g., zoning rules and regulations; tax incentives; building codes/design standards; utility rates/fee setting; public safety rules and regulations; outreach and education; emergency management powers).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Tribe is preparing a plan providing for attainment and maintenance of national standards and a control strategy that meets requirements laid out in 40 CFR Part 51.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Tribe is preparing a plan for control of designated facilities and pollutants.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Tribe is developing an air monitoring strategy.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Tribe is developing a report analyzing air quality issues impacting the Tribe and evaluated air pollution control options (identifies air pollution sources and known levels of emissions, defines potential human health and environmental impacts of current air quality, and provides recommendations for action).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>Tribe has developed a climate change vulnerability/risk assessment.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Monitoring + Inventories	Tribe is inventorying emission sources to report to EPA.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Development Area	Action	Is this a Tribal Priority?	Not Started	In Progress	Complete
Tribal Laws + Codes	Tribe is developing a program to provide compliance assurance (including inspections).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Test Drive	CAA § 111 - New Source Performance Standards (NSPS)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	CAA § 110 – Tribal Implementation Plan (TIP)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	CAA Title V – Operating Permit Program	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Permit Action Notification and Petition	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	CAA § 112 – National Emissions Standards for Hazardous Air Pollutants (NESHAP)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TAS	CAA § 111 - New Source Performance Standards (NSPS)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	CAA § 110 – Tribal Implementation Plan (TIP)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	CAA Title V – Operating Permit Program	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Permit Action Notification and Petition	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	CAA § 112 – National Emissions Standards for Hazardous Air Pollutants (NESHAP)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

