



WEST END REVITALIZATION ASSOCIATION
CHERISH EVERY DROP OF WATER YOU DRINK, EVERY LEAF THAT'S GREEN, EVERY HAND KEEPING IT CLEAN



March 13, 2025

Administrator Lee Zeldin
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Submitted to <https://www.regulations.gov>

Dear Administrator Zeldin,

Re: Clean Air for the Long Haul Comments on Docket ID No. EPA-HQ-OAR-2024-0419 - Review of New Source Performance Standards for Stationary Combustion Turbines and Stationary Gas Turbines

Thank you for the opportunity to provide comments on the Environmental Protection Agency's (EPA) proposed standards to strengthen limits on emissions of nitrogen oxides (NOx) from most new, modified, and reconstructed fossil fuel-fired stationary combustion turbines at power plants and other industrial facilities. The Clean Air for the Long Haul is a national cohort of environmental justice organizations working together to put forward campaigns and embed environmental justice in EPA rulemakings in the power and transportation sectors.

We commend the EPA for taking action to reduce NOx emissions that are released from new gas power plants and industrial sources. These proposed NOx New Source Performance Standards (NSPS) are long overdue as the EPA has not updated these standards since 2006. We believe it is critical that a strong NOx NSPS be finalized to safeguard our communities and public health. Like many environmental justice communities, our organizations work, live in, and advocate for communities of color and low wealth who disproportionately experience the

adverse health effects of nearly every major emission source,¹ including gas power plants and industrial facilities.

Health Impacts and Disparities of NO_x Emissions

NO_x emissions are released from the gas-combustion process. Nitrogen oxides are a key component in the formation of ground-level ozone or smog. Smog forms when volatile organic compounds react with nitrogen oxides emitted from power plants and industrial activities under sunlight. Exposure to ozone is linked to asthma and other chronic respiratory illnesses like COPD, in addition to metabolic disorders, brain inflammation, and reproductive and developmental harm for babies, including reduced fertility, preterm births as well as death.² NO_x also interacts with ammonia to create ammonia nitrate, a primary ingredient in fine particulate matter or soot, which threatens human health. Soot is also a main component of smog. Soot pollution can cause asthma, bronchitis, lung disease, heart attacks, stroke, memory and cognitive issues for people of all ages, infant mortality and premature deaths.^{3, 4, 5}

These health impacts are not equally distributed across the population. People of color are disproportionately exposed to fine particulate matter (PM_{2.5}) compared to white individuals. This disparity holds across income levels and regions of the United States.⁶ According to the American Lung Association's 2024 State of the Air Report, overall people of color are 2.3 times more likely than white people to live in a county with failing grades for ozone and fine particulate matter (PM_{2.5}) pollution.⁷ A history of discriminatory policies and practices have ensured that communities of color and low-income communities are more likely to reside near polluting

¹ Christopher W. Tessum et al., PM_{2.5} pollutants disproportionately and systemically affect people of color in the United States. *Sci. Adv.* 7, eabf4491(2021). DOI: [10.1126/sciadv.abf4491](https://doi.org/10.1126/sciadv.abf4491)

² American Lung Association, n.d. Health Impacts of Air Pollution, <https://www.lung.org/research/sota/health-risks>

³ Leigh Hopper, Exposure to certain pollution sources harms children's learning and memory, USC study shows, *USC Today* (2024), <https://today.usc.edu/exposure-to-certain-pollution-sources-harms-childrens-learning-and-memory-usc-study-shows/>

⁴ American Lung Association, n.d., Particle Pollution, <https://www.lung.org/clean-air/outdoors/what-makes-air-unhealthy/particle-pollution>

⁵ Bruce Bekkar, MD et al, Association of Air Pollution and Heat Exposure With Preterm Birth, Low Birth Weight, and Stillbirth in the US: A Systematic Review, *JAMA Netw Open.* 2020;3(6):e208243. <https://jamanetwork.com/journals/jamanetworkopen/fullarticle/2767260>

⁶ Christopher W. Tessum et al., PM_{2.5} pollutants disproportionately and systemically affect people of color in the United States. *Sci. Adv.* 7, eabf4491(2021). DOI: [10.1126/sciadv.abf4491](https://doi.org/10.1126/sciadv.abf4491)

⁷ American Lung Association (2024), 2024 State of the Air Report, <https://www.lung.org/research/sota/key-findings>

infrastructure, exposing them to higher than average levels of air pollution.^{8,9,10} Despite overall decreases in air pollution due to clean air regulations over time, these health disparities persist.¹¹

NOx Emissions Trends and Geographical Impact

In 2023, stationary fuel combustion in the US accounted for 2,235,000 tons of NOx emissions.¹² At the state level, NOx emissions vary considerably. An analysis from the Environmental Defence Fund, Moms Clean Air Force, and Ecomadres demonstrates that existing power plants and industrial turbines are clustered in historically overburdened communities, including in the Houston-Galveston region in Texas, Long Beach-Bakersfield region in California, New York City, and southern Louisiana.¹³ It further shows that Texas and Michigan - where cohort members Texas Environmental Justice Advisory Services and GreenDoor Initiative are based - had the first (37.8 million lbs) and third (11.8 million lbs) highest level of NOx pollution from gas-fired power plants, based on 2022 data. Texas is a good example of the fact that power plants are concentrated in environmental justice communities. 68 percent of facilities have 40% or above population of color or low-income population within a 1 mile radius.¹⁴

A WE ACT analysis of EPA emissions data from the Power Plants and Neighboring Communities Tool found that census tracts considered disadvantaged by the Justice40-based Council for Environmental Quality's Climate and Economic Justice Screening Tool (CEJST) are exposed to higher levels of NOx emissions from power plants than other communities. In 2022, power plants in CEJST identified communities, on average, emitted over 34% more NOx (194.74 tons to 144.98 tons). Overall, NOx emissions increased in the 2023 update to this dataset, but the disproportionate level of emissions in environmental justice communities remained. The updated emissions data reveals that CEJST identified communities received, on average, 295.66 tons of NOx emissions per power plant while other communities only received

⁸ Haley M. Lane et al., Historical Redlining Is Associated with Present-Day Air Pollution Disparities in U.S. Cities : *Environ. Sci. Technol. Lett.*, 9, 4, 345–350 (2022), DOI:<https://doi.org/10.1021/acs.estlett.1c01012>

⁹ Ken Ward and Mountain State Spotlight (2020), How Black Communities Become “Sacrifice Zones” for Industrial Air Pollution, *ProPublica*, <https://www.propublica.org/article/how-black-communities-become-sacrifice-zones-for-industrial-air-pollution>

¹⁰ Declet-Barreto J, Rosenberg AA. Environmental justice and power plant emissions in the Regional Greenhouse Gas Initiative states. *PLoS One*. 2022 Jul 20;17(7):e0271026. doi: 10.1371/journal.pone.0271026, <https://pubmed.ncbi.nlm.nih.gov/35857722/>

¹¹ Jiawen Liu, et al., Disparities in Air Pollution Exposure in the United State by Race/Ethnicity and Income, 1990-2010, *Environmental Health Perspectives*, Volume 129, Issue 12 (2021), DOI: <https://doi.org/10.1289/EHP8584>

¹² EPA (2025), Air Pollution Emissions Trends Data, <https://www.epa.gov/air-emissions-inventories/air-pollutant-emissions-trends-data>; See: National Tier 1 CAPS Trends spreadsheet: https://www.epa.gov/system/files/other-files/2024-02/national_tier1_caps_09feb2024_0.xlsx

¹³ Environmental Defence Fund, Moms Clean Air Force, and Ecomadres (2025), Clearing the Air: The need and opportunity to reduce unhealthy pollution from gas-fired power plants and industrial facilities, <https://turbineemap.edf.org/>

¹⁴ *Ibid.*

229.85 tons annually - a difference of over 28%. These disparities are not limited to NOx emissions but also occur in sulfur dioxide (SO₂) emissions from the same power plants.¹⁵

While EPA notes that newly constructed sources that would be subject to the proposed NOx NSPS are not known, its proximity demographic analysis of existing facilities with stationary combustion turbines that have been constructed in the last 5 years subject to the 2006 NSPS show that the proportion of people of color living within 50 km of these facilities is above the national average.¹⁶ Moreover, the percentage of population living below the poverty line within 5km of existing facilities with stationary combustion turbines is also above the poverty line.¹⁷ NOx emissions in our communities are likely to increase with the expansion of gas power plants built to support artificial intelligence,¹⁸ or as operators plan to produce, burn or co-fire hydrogen with gas or where coal-fired combustion turbines are replaced by gas.

Alongside NOx emissions, gas-fired combustion turbines used at power plants and industrial facilities also release other toxic air pollutants, such as cancer-causing formaldehyde, benzene and mercury.¹⁹ Again, it is well documented that environmental justice communities are at a higher risk of exposure to hazardous pollutants like mercury than the general population.²⁰ They also emit greenhouse gases that contribute to the climate crisis. In 2022, industry and the power sector accounted for 23 percent and 25 percent of total greenhouse gas emissions in the U.S., respectively.²¹ Communities of color and low-income communities are most vulnerable to the impacts of climate change like extreme weather, hurricanes, wildfires,²² and are at a higher risk of climate-related health impacts.²³

EPA Has Authority to and Must Finalize A Strong Rule

¹⁵ EPA (2025), Power Plants and Neighboring Communities Mapping Tool,

<https://www.epa.gov/power-sector/power-plants-and-neighboring-communities-mapping-tool>

¹⁶ EPA (2024), Regulatory Impact Analysis for the New Source Performance Standards Review for Stationary Combustion Turbines,

https://www.epa.gov/system/files/documents/2024-11/ria_combustion_turbines_nsps_proposal_2024.pdf

¹⁷ *Ibid.*

¹⁸ Corbin Hiar (2024) AI growth could spur a gas plant building spree, *ClimateWire*,

<https://subscriber.politicopro.com/article/eenews/2024/10/16/ai-growth-could-spur-a-gas-plant-building-spr-ee-00183490>

¹⁹ EPA (2024), Progress Report- Emissions Reductions: Mercury,

<https://www.epa.gov/power-sector/progress-report-emissions-reductions#hg>

²⁰ Gochfeld M, Burger J. Disproportionate exposures in environmental justice and other populations: the importance of outliers. *Am J Public Health.* (2011);101 Suppl 1(Suppl 1):S53-63. doi:

[10.2105/AJPH.2011.300121](https://doi.org/10.2105/AJPH.2011.300121)

²¹ EPA (2023), Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990 - 2022,

https://www.epa.gov/system/files/documents/2024-04/us-ghg-inventory-2024-main-text_04-18-2024.pdf

²² EPA. 2021. Climate Change and Social Vulnerability in the United States: A Focus on Six Impacts. U.S. Environmental Protection Agency, EPA 430-R-21-003.

https://www.epa.gov/system/files/documents/2021-09/climate-vulnerability_september-2021_508.pdf

²³ Berberian AG, Gonzalez DJX, Cushing LJ. Racial Disparities in Climate Change-Related Health Effects in the United States. *Curr Environ Health Rep.* 2022 Sep;9(3):451-464. doi:

[10.1007/s40572-022-00360-w](https://doi.org/10.1007/s40572-022-00360-w). Epub 2022 May 28. PMID: 35633370; PMCID: PMC9363288.

The health disparities and impacts from pollution from power plants and industry show that more now than ever before, we need to advance strong clean air standards that safeguard public health, tackle the climate crisis, and stop treating environmental justice communities as sacrifice zones.²⁴ Strengthening new source performance standards for NOx emissions is an opportunity to ensure new modified, and reconstructed fossil fuel-fired stationary combustion turbines are efficient and reduce NOx pollution for all people across the country, but especially frontline communities overburdened by these emissions.

The EPA's core mission is to protect human health and the environment. Under Section 111 of the Clean Air Act and codified in 40 CFR Part 60, Subpart KKKK, the Agency has the authority to review, revise, and promulgate new source performance standards every 8 years to reflect the best system of emission reduction (BSER), cost considerations, and other statutory criteria. However, as mentioned before, the EPA has not updated the NOx NSPS since 2006. Thus, the standards neither adequately safeguard public health nor align with achievable emission limits made possible by advancements in control technologies over the last 18+ years. By consent decree,²⁵ EPA is obligated to finalize the proposed NOx NSPS by November 2025. The Agency must ensure that it finalizes strong, health protective emissions standards that meaningfully lowers NOx emissions from these sources and reflects the best available control technologies.

Tighten Emission Limits and Ensure Best Emission Control Technologies Apply to All Regulated Sources

The current 2006 NSPS ranges from 15 parts per million (ppm) for new natural gas-fired electricity generating turbines with a heat input greater than 850 MMBtu/hour to 42 ppm for those with a heat input of 50 MMBtu/hour or less. Failure to revise the NOx standards created a loophole allowing plant developers to avoid installing the best widely available emission control technology.²⁶ Selective catalytic reduction (SCR) systems are proven, adaptable to varying sizes and types of combustion turbines, and widely available technology that is effective in reducing NOx emissions.

We support EPA's selection of post-combustion SCR in combination with combustion controls such as dry low NOx combustors and or water/steam injection as the BSER. Together, they can minimize harmful NOx emissions by 80-90%.²⁷ SCR and NOx combustion controls should apply

²⁴ Steve Lemer (2010), *Sacrifice Zones: The Frontlines of Toxic Chemical Exposure in the United States*, The MIT Press, Cambridge, Massachusetts, https://books.google.com/books?id=rqnuDwAAQBAJ&lpg=PR7&ots=T4qaEFcG_I&lr&pg=PP1#v=onepage&q&f=false

²⁵ Sean Reilly (2024), EPA rolls out changes to emission regs for new gas-fired power plants, *E&ENews*, <https://www.eenews.net/articles/epa-rolls-out-changes-to-emission-regs-for-new-gas-fired-power-plants/>

²⁶ Ethan Howland (2023) EPA could set tighter NOx limits for new gas-fired power plants under proposed consent decree, *UtilityDive*, <https://www.utilitydive.com/news/epa-nox-limits-nsps-new-gas-fired-power-plants-sierra-club-edf/653066/>

²⁷ Institute of Clean Air Companies (2009), White Paper, Selective Catalytic Reduction (SCR) Control of NOx Emissions from Fossil Fuel-Fired Electric Power Plants, at 7, https://cdn.ymaws.com/icac.site-ym.com/resource/resmgr/Standards_WhitePapers/SCR_WhitePaper_final_2009.pdf.

to all regulated combustion turbines, regardless of their size, load, capacity factor, duration of use, operation levels or operating system. There are several examples of facilities permitted and operating within a NOx emissions limit of as low as 2 - 2.5 ppm utilizing SCR, indicating its technical and economic feasibility.^{28, 29, 30} This rate is significantly lower than the current most stringent stringent limit of 15 ppm.³¹ We strongly recommend that the EPA establish NOx standards at 2 ppm at 15% oxygen, based on a 1-hour average, rather than the proposed 3 ppm or the range of 2-5 ppm emission rates outlined in the NOx NSPS proposal.

Moreover, SCR systems must be utilized throughout the operation of gas turbines, including startup and shutdown. For these periods, we advise the EPA to set a NOx emission a max limit of 15 ppm at 15% oxygen on a 3-hour average or a mass (lb) limit on a 3-hour block, depending on turbine size. This is achievable with low/ultra-low NOx controls when SCR systems are not functional. Depending on turbine model and size, low/ultra-low NOx controls can achieve emissions rates between 9 and 15 ppm.^{32, 33} It follows that the EPA should ensure that NOx emissions are controlled during periods of turbine malfunction or maintenance.

SCR systems use ammonia as a reducing catalyst when controlling NOx emissions but if this process is not optimized, ammonia leakage (or ammonia slip) can occur. Ammonia has adverse impacts on human health, including lung irritation, lung damage, asthma³⁴ and it contributes to the formation of PM 2.5 or soot,³⁵ which as mentioned before, negatively affects air quality and health, especially in environmental justice communities. As such, we recommend that EPA set an ammonia emissions standards at 2 ppm. This limit is achievable with ammonia reducing

²⁸ Vicki Stamper, Evaluation of the Best System of Nox Emission Reduction for Gas-Fired Stationary Combustion Turbines (2023), Exhibit E to EDF's May 28, 2024 Comments on the U.S. Environmental Protection Agency's Efforts to Reduce Emissions of Greenhouse Gases from Existing Fossil Fuel-Fired Stationary Combustion Turbines, Docket ID No. EPA-HQ-OAR-2024-0135-0063, <https://www.regulations.gov/comment/EPAHQ-OAR-2024-0135-0063>

²⁹ California Environmental Protection Agency Air Resources Board, Report to the Legislature, Gas-fired Power Plant NOx Emission Controls and Related Environmental Impacts, May 2004, at 10, available at <https://ww2.arb.ca.gov/sites/default/files/classic/research/apr/reports/l2069.pdf>. 13 Id. at 10-11.

³⁰ Bill Powers. (Jan 10, 2017). [A Nitrogen Oxide Limit of 2.5 ppm or Less Is the Best-In-Class Control Level for the Proposed Duke University 21.7 MW CHP Plant, Not 25 ppm as Proposed by Duke Energy. Powers Engineering, San Diego, California.](#)

³¹ Ethan Howland (2023) EPA could set tighter NOx limits for new gas-fired power plants under proposed consent decree, *UtilityDive*, <https://www.utilitydive.com/news/epa-nox-limits-nsps-new-gas-fired-power-plants-sierra-club-edf/653066/>

³² Sargent & Lundy, Combustion Turbine NOx Control Technology Memo, Final, Rev. 1, January 2022, at 3, <https://www.epa.gov/system/files/documents/2022-03/combustion-turbine-nox-technology-memo.pdf>

³³ Bill Major, ONSITE SYCOM Energy Corporation, and Bill Powers, Powers Engineering, Cost Analysis of NOx Control Alternatives for Stationary Gas Turbines, prepared for U.S. Department of Energy, November 5, 1999, at 2-10, https://www.energy.gov/sites/prod/files/2013/11/f4/gas_turbines_nox_cost_analysis.pdf

³⁴ Agency for Toxic Substances and Disease Registry (2017), Medical Management Guidelines for Ammonia, <https://wwwn.cdc.gov/TSP/MMG/MMGDetails.aspx?mmgid=7&toxid=2>

³⁵ EPA (2019) Fine Particulate Matter Precursor Determination Guidance, https://www.epa.gov/sites/default/files/2019-05/documents/transmittal_memo_and_pm25_precursor_determination_guidance_5_30_19.pdf

catalysts and process control optimization³⁶ and ensures that SCR systems are well maintained and the ammonia is uniformly distributed for optimal NOx reductions³⁷ and minimized ammonia slip.³⁸

Set Stringent Emission Limits for Hydrogen

The push for hydrogen has taken a foothold in the US power sector, bolstered by federal funding³⁹, and often featured as an integral part of utility decarbonization goals. Increasingly, plant owners and operators are developing plans and pilots to co-fire hydrogen with natural gas.⁴⁰ Hydrogen combustion releases up to six times more NOx emissions than gas combustion.⁴¹ One study found that NOx emissions increased by 20-30 percent when hydrogen was co-fired with natural gas.⁴² As environmental justice communities often live near power plants and industrial facilities, the introduction of hydrogen co-firing poses a significant risk of increasing pollution and health hazards for these vulnerable populations. Additionally, it exacerbates the climate crisis and prolongs our dependence on fossil fuels. Therefore, our cohort views hydrogen combustion/hydrogen co-firing as a false solution and we do not endorse it. However, if plants are planning to burn hydrogen or co-fire gas and hydrogen, it is imperative that EPA apply a strict new standard that limits NOx emissions to 2 ppm which can also be achieved with SCR.

Continuing Emissions Monitoring and Enforcement Is Essential

While more stringent standards are needed, they are not effective unless there is compliance. EPA must ensure that continuous emission monitoring systems (CEMS) are used to monitor, measure, and record emissions from all units. This must be done throughout the operating load cycle of the combustion turbines. Additionally, beyond NOx emission, the CEMS should monitor oxygen, volatile organic compounds (VOCs), carbon monoxide, and ammonia, which will show the effectiveness of the BSER (i.e. SCR with combustion controls) and ensure that units are in

³⁶ Institute of Clean Air Companies (Jun 2011), Whitepaper: Ammonia Measurement For Combustion Sources, <https://montrose-env.com/wp-content/uploads/2017/09/Ammonia-Measurement-for-Combustion-Sources.pdf>

³⁷ Wardana, M.K.A., Shahariar, G.M.H., Oh, K. *et al.* Ammonia Uniformity to Predict NOx Reduction Efficiency in an SCR System. *Int.J Automot. Technol.* 20, 313–325 (2019). <https://doi.org/10.1007/s12239-019-0031-x>

³⁸ Rafal Sala *et al.*, 2018, Ammonia Concentration Distribution Measurements on Selective Catalytic Reduction Catalysts, *Catalysts* 2018, 8(6), 231; <https://www.mdpi.com/2073-4344/8/6/231>

³⁹ Department of Energy, n.d. Regional Clean Hydrogen Hubs, <https://www.energy.gov/oced/regional-clean-hydrogen-hubs-0>

⁴⁰ Clean Energy Group, n.d. Hydrogen Projects in the US, <https://www.cleanenergygroup.org/initiatives/hydrogen/projects-in-the-us/>

⁴¹ Mehmet Salih Cellek and Ali Pınarbaşı, Investigations on performance and emission characteristics of an industrial low swirl burner while burning natural gas, methane, hydrogen-enriched natural gas and hydrogen as fuels, *International Journal of Hydrogen Energy*, Volume 43, Issue 2, 2018, Pages 1194-1207, ISSN 0360-3199, <https://doi.org/10.1016/j.ijhydene.2017.05.107>

⁴² Ruly Bayu Sitanggang (2023), Performance and Emission Analysis of Hydrogen and Natural Gas Co Firing in Combined Cycle Gas Turbine Power Generation, *Journal of Applied Engineering Science*, Vol 21, No.2, DOI: [10.5937/jaes0-41926](https://doi.org/10.5937/jaes0-41926)

compliance with the standards. It is crucial that EPA requires that CEM data be reported to the Agency on a regular basis and made available in an accessible format to local communities and the general public. This will provide opportunities for reporting violations in real-time and enable the Agency to take appropriate enforcement measures, including ensuring plant operators make swift and necessary adjustments or perform maintenance on SCR systems to maintain compliance. In addition, robust monitoring and transparency ensures that the public, and more specifically frontline and environmental justice communities are protected from exposures to health harming pollutants.

Moreover, the proposed rule covers sources that emit other harmful pollutants such as sulfur oxides, particulate matter, carbon dioxides, ammonia and hazardous air pollutants. We stand with public health organizations in their call for “stringent construction and operation permits to be required with timely reporting of operational compliance to the revised NOx emission limits and other applicable regulations.”⁴³ We also reiterate that with respect to the siting, construction, and operating permitting of new facilities covered by this proposed rule, the EPA requires that states take into consideration cumulative impacts on environmental justice communities. This is currently being done in cohort member states like New Jersey⁴⁴, New York,⁴⁵ and Massachusetts⁴⁶ and within the scope of EPA’s interim Framework for Advancing Consideration of Cumulative Impacts.⁴⁷

In conclusion, the Clean Air for the Long Haul cohort urges the EPA to adopt stricter NOx emissions standards for stationary combustion turbines at gas power plants and industrial facilities by November 2025. We will continue to advocate and fight for this rule and other environmental regulations that protect public health and ensure environmental justice communities are safe from increased pollution burdens and health risks.

⁴³ American Lung Association et al (2025), Health Organization Comments on Review of New Source Performance Standards for Stationary Combustion Turbines and Stationary Gas Turbines (Docket #: EPA-HQ-OAR-2024-0419), at pg 6

https://www.lung.org/getmedia/0cf328bc-a783-473c-97b0-9e60fa0f3d8d/ALA_Partners_Comments_EPA_PR_NOx_NSPS_GasTurbines_012025.pdf

⁴⁴ ECOS (2023), New Jersey Adopts Final EJ Rule on Cumulative Impacts,

<https://www.ecos.org/news-and-updates/new-jersey-adopts-final-ej-rule-on-cumulative-impacts/>

⁴⁵ NY Department of Energy Conservation, n.d. The Environmental Justice Siting Law,

[https://dec.ny.gov/environmental-protection/environmental-justice/the-environmental-justice-siting-law#:~:text=The%20Environmental%20Justice%20Siting%20Law%20\(EJ%20Siting%20Law\)%2C%20sometimes,in%20certain%20environmental%20decision%20making.](https://dec.ny.gov/environmental-protection/environmental-justice/the-environmental-justice-siting-law#:~:text=The%20Environmental%20Justice%20Siting%20Law%20(EJ%20Siting%20Law)%2C%20sometimes,in%20certain%20environmental%20decision%20making.)

⁴⁶ Massachusetts Department of Environmental Protection (2024). Massachusetts Becomes First State to Require Analysis of Cumulative Impacts for Air Quality Permits near Environmental Justice Populations.

<https://www.mass.gov/news/massachusetts-becomes-first-state-to-require-analysis-of-cumulative-impacts-for-air-quality-permits-near-environmental-justice-populations>

⁴⁷ EPA (2024), Interim Framework for Advancing Consideration of Cumulative Impacts,

<https://www.epa.gov/system/files/documents/2024-11/epa-interim-cumulative-impacts-framework-november-2024.pdf> . See also environmental justice letter on the interim framework,

<https://www.regulations.gov/comment/EPA-HQ-OLEM-2024-0360-0043> and

<https://www.regulations.gov/comment/EPA-HQ-OLEM-2024-0360-0062>