



# Air Tribal Strategic Plan



**U.S. EPA Region 10  
Office of Air, Waste and Toxics  
March 24, 2009**

## Outline for the Air Tribal Strategic Plan

### Executive Summary

I.	Purpose.....	3
II.	Development of the Air Tribal Strategic Plan .....	4
III.	Region 10 Air Tribal Program’s Focus Areas, Resource Gaps, and Future Directions.....	5
IV.	Other Strategic Plans.....	6
V.	Region 10 Air Tribal Programs’ Projects to Support our Goals & Objectives.....	7
	1. Tribal Program Support and Tribal Capacity Building and Maintenance .....	9
	2. Grants Management .....	15
	3. Emissions Inventories .....	18
	4. Monitoring .....	21
	5. Outreach.....	25
	6. Air Quality Planning.....	30
	7. Permits .....	33
	8. Compliance & Enforcement .....	36
	9. FARR.....	41
	10. Tribes in Alaska .....	47
	11. Smoke Management.....	52
	12. Woodstoves and Residential Woodsmoke.....	56
	13. Indoor Air and Radon .....	58
	14. Air Toxics .....	59
	15. Diesel .....	62
	16. Climate Change.....	64

Appendix 1: Region 10 Organizational Chart

Appendix 2: Summary Table of Projects

Appendix 3: EPA Region 10 Staff Contact List

Appendix 4: Summary of Clean Air Work by Region 10 Tribes

## Executive Summary

Tribes in Region 10 and EPA have made enormous strides in the management of air quality in Indian country and other Tribal communities. With almost four years experience in implementing the Federal Air Rules for Reservations in Idaho, Oregon, and Washington (FARR) and with the substantial capacity that Tribes have developed to understand and manage air quality, we think this is a good time to reflect on the progress made and discuss the direction we want the program to go.

Over the past year, we worked to develop a strategic plan for the Tribal work in the air program. The main purpose of the strategic plan is to identify and achieve support for EPA's areas of focus. The strategic planning process included getting input from EPA staff and managers and Tribes on what can be done to improve air quality in Indian country. The plan identifies five focus areas and over sixty projects that EPA Region 10 staff is currently working on or is planning to work on in partnership with Tribes over the next two to five years. For a list of projects, please see Appendix 2.

**Focus Areas:** The five focus areas are particulate matter and burning, air toxics, indoor air, improved data and information quality, and improved communication. Each project in the Air Tribal Strategic Plan is included to help us make progress in one or more of these focus areas.

**Resource Gaps:** Through the strategic planning process, three areas of work have been identified as important areas that currently do not have enough resources (EPA staff time): Alaska air quality, emissions inventories, and indoor air quality. We do not expect to get new resources, but we will explore ways to shift existing resources to these areas.

Additionally, the EPA Region 10 air program intends to explore more cross-programmatic opportunities. We have been working with the solid waste program on open burning issues, and over the next few years, we would like to work with other programs on projects addressing confined animal feeding operations, mining, atmospheric deposition, and climate change.

Workplans have been developed for each project in the strategic plan, and progress and accomplishments will be tracked and reported regularly internally and externally. Region 10 intends to evaluate and update the Air Tribal Strategic Plan in two years.

## **I. Purpose**

Tribes in Region 10 and EPA have made enormous strides in the management of air quality in Indian country and other Tribal communities. With almost four years experience in implementing the Federal Air Rules for Reservations in Idaho, Oregon, and Washington (FARR) and with the substantial capacity that Tribes have developed to understand and manage air quality, we think this is a good time to reflect on the progress made and discuss the direction we want the program to go. This strategic plan is intended to:

- Identify and achieve support for EPA's areas of focus to guide work and resource decisions.
- Provide a management tool to track work and assess progress.
- Communicate our work to others.
- Improve accountability within EPA.
- Integrate different pieces of Tribal work (FARR, grants management, monitoring, etc.) into a cohesive and unified Tribal air program.

Enhancing Tribal environments is a priority identified in the Region 10 Strategic Plan and the Office of Air, Waste and Toxics (OAWT) '09/'10 priorities. The Air Tribal Strategic Plan will help demonstrate how the Region 10 air program is accomplishing the Region's and Office's priority work. Within Region 10, there are many offices that support Tribal air work. For more information on what Region 10 offices are involved in Tribal air work, please see Appendix 1.

The Air Tribal Strategic Plan covers a five-year period, with particular emphasis on EPA's work over the next two years. The Air Tribal Strategic Plan describes projects that EPA Region 10 believes are important areas of focus and which EPA intends to support during the next five years. It is a living document that is open to refinement as priorities, resources, and circumstances change. Region 10 intends to evaluate and update the Air Tribal Strategic Plan in two years.

## **II. Development of the Air Tribal Strategic Plan**

It is very important to us that the Air Tribal Strategic Plan aligns with what Tribes and EPA staff and managers think EPA should do to improve and protect air quality in Indian country and other Tribal communities. Therefore, getting input from these groups was an essential part of the development process for the Air Tribal Strategic Plan. We received input from staff and managers throughout Region 10 through several input meetings. We sought input from Tribes through a small Tribal workgroup, through the Regional Tribal Operations Committee (RTOC), during meetings and conference calls with Tribal air staff, and we distributed the draft strategic plan to all Tribes in Region 10 for review and comment.

### III. Region 10 Air Tribal Program's Focus Areas, Resource Gaps, and Future Directions

EPA's National Strategic Plan sets a goal to "protect and improve the air so it is healthy to breathe and risks to human health and the environment are reduced." The Region 10 Air Tribal Strategic Plan incorporates this same goal and focuses on five key areas: particulate matter and burning, air toxics, indoor air, improved data and information quality, and improved communication. Each project in the Air Tribal Strategic Plan was included to help us make progress in one or more of these focus areas.

#### Focus Areas:



**Particulate Matter / Burning** - Particulate matter is a complex mixture of extremely small particles and liquid droplets in the air. When breathed in, these particles can reach the deepest regions of the lungs and cause significant damage and disease. Particulate pollution is also the main cause of visibility impairment in cities and national parks. In 2006, EPA strengthened the 24-hour fine particle standard from 65 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ) to 35  $\mu\text{g}/\text{m}^3$ . Particulate matter is the criteria pollutant of most concern in the Northwest. An important contributor to particulate matter levels in the Northwest is open burning, which has long been used as a waste disposal practice and as a management tool for croplands, rangelands, and forests. Because of the potentially significant effects smoke can have on people's health, it is important that burning be well-managed by regulatory agencies. Burning of wood in woodstoves and fireplaces is also a key contributor to fine particle levels in the Northwest in the winter.



**Air Toxics** - Air toxics are hazardous air pollutants that may cause cancer, birth defects, or other serious health problems. Under the Clean Air Act (CAA) Amendments of 1990, EPA is required to regulate emissions of 188 hazardous air pollutants. These pollutants can come from a variety of sources including point sources, area sources, indoor air sources, and mobile sources. Mercury is an air toxic pollutant that is of particular concern to Tribes. EPA is working in partnership with State, local and Tribal authorities to reduce the emission of hazardous air pollution from all sources in order to better protect public health and the environment in our region.



**Indoor Air** - Most people are aware that outdoor air pollution can affect their health, but indoor air pollution can also have significant health effects. EPA studies of human exposure to air pollutants indicate that indoor levels of pollutants may be 2-5 times, and occasionally more than 100 times, higher than outdoor levels. These levels of indoor air pollutants may be of particular concern because most people spend about 90% of their time indoors. Indoor air pollution can come from a range of sources, including woodstoves, mold, dust and radon. Although indoor air quality is not directly regulated

under the CAA, it is a problem in many Tribal communities and is a major area of concern for Tribes.



**Improved Data and Information Quality** - As the Air Tribal Program matures, there is an increasing need to take actions that produce environmental results and are accountable to the public. Improved data and information quality will help EPA and Tribes to better manage air quality, make better decisions, and better track and demonstrate the results of air program work. Collecting, compiling and making data available from air quality monitors, permits, emissions inventories, and complaint response is an ongoing and rapidly developing area of focus. The Air Tribal Program has increasingly relied upon the logic model and other indicator measurement systems to help design and track air quality projects, and the Air Tribal Strategic Plan itself contains many projects and measures that will help us better manage and communicate our accomplishments.



**Improved Communication** - The Air Tribal Program chose improved communication as an area of focus to ensure Tribes and EPA have effective and open communication as we work together to address air quality issues. The strategic plan also includes a lot of outreach and education projects to ensure the regulated community and the public understand the health effects of air pollution and the requirements in place to protect air quality. This document is an example of our goal to make our priorities and projects more transparent and to invite comment and participation from Tribes.

**Resource Gaps:** Through the strategic planning process, three areas of work have been identified as important areas that currently do not have enough resources (EPA staff time): Alaska air quality, emissions inventories, and indoor air quality. We do not expect to get new resources, but we will explore ways to shift existing resources to these areas. Some of the smaller shifts may be able to occur in the near term, while larger shifts may take several years.

**Future Directions:** In addition to filling the above resource gaps, the EPA Region 10 air program intends to explore more cross-programmatic opportunities. It can be difficult to work across different statutes and offices, but the public and our Tribal partners view environmental problems holistically. We have been working with the solid waste program on open burning issues, and over the next few years, we would like to work with other programs on projects addressing confined animal feeding operations, mining, atmospheric deposition, and climate change.

#### **IV. Other Strategic Plans**

The Region 10 Air Tribal Strategic Plan was developed using the EPA Strategic Plan, the Office of Air and Radiation (OAR) Tribal Strategic Plan, the Office of Air Quality Planning and Standards (OAQPS) Tribal Plan, and the Region 10 Strategic Plan

as guiding references. These plans range from the big picture national goals and objectives to plans with a narrower geographic or programmatic focus. The Region 10 Air Tribal Strategic Plan focuses on air quality in Indian country and other Tribal communities in Region 10, while embracing the goals and objectives of the national and regional plans.

The Tribal air program is primarily addressed under “Goal 1 – Clean Air and Global Climate Change” and “Goal 5 – Compliance and Environmental Stewardship” in the National EPA Strategic Plan for 2006 – 2011, which can be viewed at <http://www.epa.gov/ocfo/plan/plan.htm>:

- Protect and improve the air so it is healthy to breathe and risks to human health and the environment are reduced (Goal 1); and
- Protect human health and the environment on Tribal lands by assisting federally-recognized Tribes build environmental management capacity, assess environmental conditions and measure results, and implement environmental programs in Indian country (Goal 5).

## **V. Region 10 Projects to Support our Goals**

The following sections describe over sixty projects EPA intends to complete over the next two to five years to protect human health, air quality, and the environment in Indian country in Region 10. Each section describes an EPA Region 10 air quality program area, describes project activities, and identifies the current EPA staff investment (FTE).<sup>+</sup>

Potential Future Projects: In some sections, we identified “potential future projects” that EPA currently does not have the resources for, but that EPA could work on if resources become available or EPA decides to shift resources from current projects to higher priority work.

Measures: Potential measures are identified for each project that could be used to report and demonstrate progress. While improved human health and the environment is our primary goal, we may need to use surrogate measures to measure success where it is difficult or impossible to measure changes in human health or the environment. Changes in air quality levels, emissions, human behavior, or complaints received may be used as surrogate measures for improvements in human health or the environment. Another approach to measuring success is counting the number of specific activities completed – the number of inspections conducted, the number of public outreach meetings held, the number of sources registered, etc. We will collect and report information for the identified measures, and we will continue to strive towards improving our measures.

In addition to the measures for each project, we will collect information that is representative of increased Tribal capacity to implement CAA programs, through the Annual Commitment System (ACS) measures, which are tracked by Headquarters. The FY09 ACS measures for the Tribal Air Program are:

- Number of Tribes with approved eligibility determinations for Treatment in the Same Manner as a State (TAS) for sections of the CAA.
- Number of Tribes with delegation of federal programs to address air quality conditions on Tribal lands.
- Number of Tribes with approved Tribal Implementation Plans (TIPs) to address air quality conditions on Tribal lands.
- Number of Tribes conducting air quality monitoring activities.
- Number of Tribes implementing voluntary programs.

<sup>+</sup>These FTE estimates are approximate and include EPA staff, Senior Environmental Employees (SEEs) and one staff member on an Intergovernmental Personnel Agreement (IPA) from the Nez Perce Tribe.

**Goal: Protect air quality, human health, and the environment.**

**Objective: Build sustainable air programs at EPA and for Tribes & develop effective partnerships.**

**Focus Area:**



**Communication**

**1. Tribal Program Support and Tribal Capacity Building and Maintenance (current FTE = 1.0):**

A large part of EPA staff time and resources are focused on building and maintaining the capacity of Tribes for air quality management through training and education, technical assistance, facilitating communication, delegation of Federal programs, support for eligibility determinations for Tribes to receive TAS, and support for Tribes as they develop Tribal rules and voluntary programs to address air pollution impacting their communities. Region 10 works with the Institute for Tribal Environmental Professionals (ITEP) and others to make training available to meet the needs of Region 10 Tribes and continues to explore ways to provide more air quality training for Tribes in Alaska.

The Region 10 air program also has a role in Tribal policy development nationally and regionally and participates in many agency workgroups. Region 10 strives to collaborate and establish partnerships with Tribes, other agencies and stakeholders for a more efficient and coordinated response to air quality issues in Indian country and other Tribal communities.

It is also important to build awareness within the EPA air program of Tribal history, culture and governance by encouraging all staff and managers to participate in the *Working Effectively with Tribal Governments* training course (available through the internet or in the classroom) and helping them stay familiar with the OAWT Tribal consultation policy.

**Projects to Support these Goals & Objectives:**

**A. Effective Communication** – The Region 10 Air Tribal Program will continue to support regular communication between EPA and Tribes, among Tribes, within EPA, and with other Federal, State, and local agencies and stakeholders.

*Tasks:*

1. Participate in and/or facilitate monthly conference calls with Tribes in Alaska and with Tribes in Idaho, Oregon and Washington.

*Leads:* Mary Manous (Alaska) and Debra Suzuki (Idaho, Oregon and Washington)

2. Support a meeting in Seattle every other year with air quality managers from Tribes in Idaho, Oregon, and Washington. These meetings will provide time for Tribes to meet among themselves, or facilitated by the Pacific Northwest Tribal Air Network (PNTAN), as well as to meet with staff from EPA and other agencies. EPA will also look for opportunities to provide training in conjunction with these meetings.

*Lead:* Debra Suzuki

3. Attend one conference in Alaska each year to meet with as many representatives from Alaska Tribes as possible and support an initiative among Alaska Tribes to convene a meeting devoted to air quality concerns in rural Tribal communities.

*Lead:* Mary Manous

4. Contribute to regional and national CAA work related to Tribes through participation in (a) the Region 10 Tribal Specialist workgroup with representatives of the Tribal Trust and Assistance Unit (TTAU) and each Region 10 office and (b) the national Tribal Air Coordinators workgroup made up of representatives from each OAR headquarters office and nine<sup>1</sup> of the regions.

*Lead:* Mary Manous

5. Participate and present on air quality topics at the Region 10 Tribal Leaders Summit.

*Lead:* Mary Manous

*Outcome:* Effective and regular communication opportunities on Tribal air topics.

*Measure:* Calls and meetings are held.

Communication opportunities meet the needs of Tribes and EPA (qualitative).

***B. Visits with Tribes*** – It is important for EPA staff to visit Tribes and their reservations, native villages, or communities to further our understanding of the air quality issues the Tribe is facing, to strengthen relationships between EPA and Tribal staff, and to have an opportunity to discuss the work being done by EPA and the Tribe. We also will seek to include State and local air agencies in some of these meetings, as appropriate, to establish relationships between the agencies within an airshed, to enhance inter-agency communication on topics of common concern, and to learn from each other.

*Tasks:*

1. Visit each Tribe in Idaho, Oregon and Washington with an EPA-funded air program or project at least once every two years.

2. Visit one or more Tribes in Alaska each year.

*Lead:* Mary Manous

*Outcome:* Improved relationships with Tribes and understanding of the air pollution concerns across Indian country and Tribal communities.

*Measures:* Number of visits each year.

Number of programs / agencies in attendance.

***C. Orientation Training for New Air Quality Staff Working for Tribes*** – To help the orientation process for new Tribal air quality staff, we will facilitate opportunities for

---

<sup>1</sup> Region 3 has no federally recognized Tribes within the borders of its constituent states and consequently does not participate in this group.

new staff to visit EPA to meet with their grant project officer to discuss the work plan, to introduce them to key EPA contacts, and to point them to important resources for future training and development.

*Tasks:* Plan each visit and coordinate the training the new staff will receive.

*Lead:* Mary Manous and Justin Spenillo.

*Outcome:* Increased Tribal capacity.

*Measure:* Percent of new Tribal air quality staff that receive orientation training.

***D. Partnership Pilot Program*** – The purpose of developing the partnership program is to pair Tribal air staff and EPA air staff to increase the understanding of each other’s organizations, to build capability, to facilitate regular communication, and to learn about how to work together collaboratively.

*Tasks:*

1. By April 2009, find interested staff from EPA and from Tribes and match up two to four sets of partners.
2. After 6 months, complete an initial review of the program, identify opportunities for improvement, and a recommendation of whether to expand the pilot program to include additional partnerships.

*Lead:* Gary Olson

*Outcome:* Relationship building, better understanding of issues and concerns.

*Measures:*

Number of partners.

Frequency of communication between partners.

Evaluation by each participant on the value of the partnership to them, including the number of contacts, subjects discussed, indications of improved communication and understanding of the other’s work, or increased knowledge and understanding of an air-related topic.

***E. Guidance on Regulatory Options for Tribes*** - To assist Tribes moving toward CAA implementation, we will create a guidance document that explains the regulatory options Tribes have under the CAA (Tribal Implementation Plans (TIPs), delegation of Federal rules, and Tribal regulations). This document will help Tribes better understand the implications and requirements of the available options so that they can choose the best path for their situation.

*Tasks:* Draft guidance, complete internal review, finalize guidance and distribute to Tribes by March 2009.

*Lead:* Rich McAllister and Debra Suzuki

*Outcome:* More informed decisions by Tribes.

*Measure:* Guidance is distributed to Tribes.

***F. FARR Delegation Discussion at a Meeting with Tribes*** – The purpose of this project is to increase the understanding of and implications of delegation so that Tribes can assess their need and desire to seek delegation of certain provisions of the FARR. At a to-be-determined upcoming meeting with Tribes, we will have an open dialogue among EPA, Region 10 Tribes with delegation, and Tribes without delegation to discuss the advantages and disadvantages of delegation, resource implications, capacity building, what can be done without delegation, and how EPA's role changes with delegation.

*Task:* Prepare for a presentation and discussion at an upcoming meeting with Tribes.

*Lead:* Steve Body

*Outcome:* More informed FARR delegation decisions by Tribes and better understanding by EPA of its role in the support of FARR delegation to Tribes.

*Measure:* Presentation made to Tribal air managers.

***G. Research Delegation of FARR Enforcement Authority*** – We will research the possibility of revising the FARR to allow delegation of enforcement authority and will communicate our findings internally and with Tribes.

*Tasks:*

1. By June 2009, we will research whether it is possible to delegate FARR enforcement authority to Tribes.
2. By August 2009, we will communicate this information to EPA management and to Tribes and if delegation is possible, we will describe what EPA would need to do to make this happen, what Tribes would need to do to get delegation, and what delegation of enforcement authority would mean. This information will be used to make a decision on whether to pursue this FARR revision in the future.

*Lead:* Debra Suzuki

*Outcome:* Decision to revise the FARR or not is made.

*Measure:* Information is communicated and decision on FARR revision is made.

***H. TAS*** – We will work closely with Tribes interested in getting TAS under the CAA. The Swinomish Tribe (section 110/TIPs and 505(a)(2)/affected State), the Kootenai Tribe of Idaho (301(d)/ CAA 105 grants) and the Confederated Tribes of the Coos,

Lower Umpqua and Siuslaw Indians (301(d))/ CAA105 grants) have / are planning to submit TAS applications in 2009.

*Tasks:*

1. Discuss with the Tribe what type of TAS they are interested in pursuing.
2. Provide guidance on the TAS process, review and comment on drafts of the TAS application, and maintain communication with the EPA Region 10's Office of Regional Counsel (ORC).
3. Act on the Tribe's TAS application with ORC within time frames specified in the January 23, 2008 Strategy for Reviewing Tribal Eligibility Applications to Administer Regulatory Programs (Memorandum from Marcus Peacock).
4. Ensure paper and electronic records are maintained for each TAS in the EPA Region 10 Tribal Air Team Files.

*Lead:* Justin A Spenillo

*Outcome:* Tribes have increased responsibility for CAA implementation.

*Measures:* Number of applications processed and completed within the time periods set by the above referenced Memorandum.

**Potential Future Projects:** EPA currently does not have the resources for these projects. We do not plan to work on these projects unless additional resources become available.

**A. Tribal Air Program Evaluation** – Tribes in Region 10 and EPA have made great progress in protecting air quality. A program evaluation would help us demonstrate how the Tribal Air Program in Region 10 is protecting air quality and human health in Indian country and how the program might be improved. Each May, the Office of Policy, Economics and Innovation has an internal competition to award money to support program evaluations. We would submit a proposal to design a Region 10 Tribal Air Program Evaluation.

*FTE Need:* 0.25 FTE for one year.

**B. Increased Communication** - To increase the interaction and communication with Tribes and others on Tribal air issues, some or all of the following could be initiated.

- Support an annual rather than biennial meeting with air quality managers from Tribes in Idaho, Oregon, and Washington.
- Facilitate an annual or biennial meeting on air quality topics with Tribes from Alaska.
- Distribute information on training, rulemakings, funding sources / grant opportunities and other topics of interest to Tribes via email at least monthly.
- Initiate contacts with other Federal agencies to identify partners that may be able to collaborate with Tribes and EPA and address air quality issues in Indian country. These agencies will be invited to participate in the annual meetings with Tribal air quality managers, as appropriate.
- Actively pursue opportunities to present at meetings with Tribes, such as the National Tribal Forum, Affiliated Tribes of Northwest Indians (ATNI) conferences, and the Alaska Forum on the Environment to ensure that Region 10 Tribal air issues are understood and addressed.

*FTE Need:* 0.25 FTE annually.

**C. Administrative Support for the PNTAN** – To help support PNTAN as an environmental professional organization, EPA will explore ways to provide administrative support for the group.

*FTE Need:* 30 hours for initial research, 0.05 FTE on-going

**Goal: Protect air quality, human health, and the environment.**

**Objective: Provide grant support to build and maintain successful Tribal air programs.**

**Focus Areas:**



**Communication**



**Information**

**2. Grants Management (current FTE = 2.0):**

Grant funding is available to support activities by Tribes to assess and manage air quality on reservations. Federally-recognized Tribes and Tribal consortia are eligible for EPA financial support to carry out air quality projects and programs under at least four grant authorities: 1) Indian General Assistance Program (GAP) for baseline assessments and capacity building; 2) CAA §103 for limited term projects to investigate the causes and prevention of air pollution; 3) CAA §105 for programs to manage air quality and control air pollution; and 4) Direct Implementation Tribal Cooperative Agreements (DITCAs) to assist EPA with direct implementation of the CAA. OAWT currently manages approximately 20 Tribal grants with approximately \$2 million allocated to Region 10 annually. In addition, there have been an increasing number of Tribes that have begun to do air assessments through their GAP grants.

**Projects to Support these Goals & Objectives:**

**A. Effective Grant Management by EPA and Tribes:** Tools have been developed for use by EPA and Tribes to facilitate better management of grants and to document accomplishments toward overall objectives through measurable outputs and outcomes. Examples of these tools are the *Tribal Air Grants Framework: A Menu of Options for Tribal Air Grants Management* and “logic model”-based tables used with individual grant workplans. When awarding grants, EPA has put a greater focus on the specific air quality problems and needs of individual reservations through the development of summaries of accomplishments and team reviews of characteristics, performance, and needs. The review team also relies on cross-regional technical, legal and programmatic expertise. Ensuring that grant terms and conditions, policies, and regulatory requirements are met, as well as performance and outputs achieved with grant funds, requires ongoing attention through activities such as the following:

*Tasks:*

- 1. Technical or Programmatic Assistance.** Grantees will be provided technical and programmatic assistance as needed to build Tribal capacity to better manage the air quality project or program being funded.
- 2. Progress reports:** Progress reports receive timely and adequate project officer review, including a comparison with workplan commitments, communication of feedback on performance to the grantee, and oversight to come into compliance with grant terms and conditions when corrective action is needed.
- 3. Post Award Monitoring:** Timely and effective Baseline and Advanced Post Award Monitoring on each grant is conducted annually pursuant to EPA policies and in a manner to ensure that the grant is being effectively managed and objectives accomplished.

**4. Final Reports:** Collaboration with Tribal and EPA staff to identify the most effective and useful format and content of a final report for each grant so that there will be adequate documentation of the outputs and outcomes from the grant funding to assist the Tribe and EPA in future air-related work.

Lead: Mary Manous

*Outcomes:* Improved progress reports and final reports that document environmental results generated under the grant and will be useful as a reference for future air quality management work. Improved environmental results from grants.

*Measures:* Quality and timeliness of progress reports and deliverables/outputs. Documentation is produced of the outputs and outcomes under the grant in a format that can be used for presentations to Tribal and EPA management.

***B. Standardized Grant Outputs, Performance Measures, and Reporting Requirements*** - Building upon past work and guidance, EPA will work with Tribes to develop common measures of performance to track outputs and outcomes in a way that minimizes time required while still demonstrating the achievement of air pollution control and human health protection.

*Tasks:*

1. Grant Guidance for the Menu of Options will be developed to assist Tribal Air Grant applicants in developing workplans based upon the Menu of Options.

✓**TASK COMPLETED**

2. Encourage more Tribes to use the new workplan templates over time.

3. The Tribal Air Grants Framework: Menu of Options will be reviewed for each topical program area to update them and to identify more effective measures for outputs and outcomes. This will be done in a progressive fashion so that the most important areas to Region 10 Tribal air grants are given priority. Two topical areas, such as air quality assessment and monitoring, will be completed by December 2009. At least two additional areas will be addressed each calendar year.

4. Common outputs and outcomes will be available for use by Tribes in FY09 grant cycle and will be evaluated in conference calls with Tribes to continue to refine and improve them through each grant cycle so that better measures of success and accomplishments are available for Tribes and EPA to use to describe Tribal air work.

5. As common outputs and outcomes are developed, a system will be put in place for collecting and reporting these accomplishments to EPA and Tribal management.

Lead: Mary Manous and Justin Spenillo

*Outcome:* More effective grant management and more complete and timely grant reporting.

*Measures:*

New/revised grant measures developed and used.

Two or more topical areas will have common outputs and/or outcomes developed and usable for the FY 2009 grant cycle.

Reduced time for workplan negotiation and input.

**Potential Future Projects:** EPA currently does not have the resources for these projects. We do not plan to work on these projects unless additional resources become available.

***A. Document Tribes' and EPA's Needs and Resource Shortfalls*** - Work with Tribes to develop a basis for measuring unmet air quality and air program needs. This documentation of needs can be used by EPA and Tribal governments to illustrate our resource shortfalls.

***FTE Need:*** 0.20 FTE for one year

**Goal: Protect air quality, human health, and the environment.**

**Objective: Gain a better understanding of the significant sources of air pollution in Indian country.**

**Focus Areas:**



**PM/Burning**



**Air Toxics**



**Information**

**3. Emissions Inventories (current FTE = < 0.1):**

An emissions inventory identifies air pollution sources located within a particular geographical area and the type and amount of pollution being emitted by each source. Emissions inventories can include emissions from stationary sources, areas sources and mobile sources. This information is used to assess the potential air quality problems in the area. State and local air agencies, and some Tribes, enter their emissions inventory data into EPA's national emissions inventory (NEI) database. Region 10 has emissions information for stationary sources required to register under the FARR, however, this information has not been entered into NEI yet. Some Tribes use the Tribal Emissions Inventory Software Solution (TEISS), which is an application for creating and maintaining a comprehensive emissions inventory. TEISS is designed to guide the user through the creation of an emissions inventory from estimating emissions through to exporting data for the NEI. EPA provides technical and financial support to Tribes to develop emissions inventories.

In addition, the number of emissions inventories completed by Tribes or for reservations and submitted to

the NEI is used as an EPA performance measure and is also a factor in the formula used to allocate Tribal CAA grant funds to the Regions.

**Projects to Support these Goals & Objectives:**

**A. FARR Registration Follow-up and Analysis** – We will follow up with facilities that have been non-responsive in submitting registration information under the FARR. We will also create registration reports and will analyze the registration information to make recommendations on what individual sources, source categories, activities, and pollutants we should focus on for inspections, outreach and compliance assistance, compliance determinations, or additional rule revisions.

*Tasks:*

1. Follow-up with known sources that have not registered and continue looking for additional potential sources, with the help of Tribal staff, if possible.
2. After we receive new registration information each February, we will enter the information into the FARR database, and we will also scan the registration files into the database.
3. By September of each year, we will create a report that contains a summary and analysis of the registration information and recommendations based on this analysis, as described above. This report will be distributed within EPA and to all Tribes.

4. By September of each year, we will create reports for each reservation with information on the registered sources for that reservation. We will distribute the reservation-specific reports to the appropriate Tribes.

*Lead:* Bill Todd

*Outcome:* Increased knowledge of air pollution sources and their emissions.

*Measure:* Annual registration reports are completed and distributed.

**Potential Future Projects:** EPA currently does not have the resources for these projects. We do not plan to work on these projects unless additional resources become available.

***A. Regional Tribal Emissions Inventory for Indian Country in Idaho, Oregon, and Washington*** – Region 10 would use TEISS to access and review emissions inventory information entered by Tribes; supplement TEISS with any additional existing information EPA already has (see Levels 1 and 2 below); reconcile any differences between the information the Tribes have entered and the information EPA has; in coordination with Tribes, collect area source information (see Level 3 below); and update TEISS with the new information obtained. EPA would collect, estimate, and enter information for criteria pollutants and air toxics. EPA would estimate Greenhouse Gas (GHG) emissions for the sources listed below if TEISS is updated to include GHG emissions (this update has been proposed but not funded yet).

- **Level 1 Major stationary sources:** Ensure all data for major Title V sources is entered into TEISS.
- **Level 2 Registered sources:** Ensure all data for sources that have registered under the FARR is entered into TEISS.
- **Level 3 Significant area sources:** Collect data for the most significant area sources and enter it into TEISS. We would initially focus on woodstoves, open burning (including agricultural and forestry burning), gas stations, and autobody shops.

*FTE Need:* 1 FTE for one year or 0.50 FTE for two years.

***B. Air Quality Assessment Training for Tribes in Alaska*** – EPA would work with ITEP, ADEC, and OAQPS to develop an assessment protocol and training course for Tribal environmental staff on how to conduct an evaluation of air quality that is relevant for Tribes in Alaska to better understand the sources of air pollution that are impacting their communities.

*FTE Need:* 0.1 FTE for one year.

***C. Improved Use of EI Data in Air Quality Management:*** Region 10 will work with OAQPS, ITEP and others to provide training and technical assistance to Tribes on the use of emissions inventory data by Tribal decision makers for air quality management purposes (e.g., for selecting the most appropriate control methodologies, whether regulatory or voluntary).

*FTE Need:* 0.1 FTE for one year, 0.05 ongoing.

**Goal: Protect air quality, human health, and the environment.**

**Objective: Collect information to evaluate the air quality in Indian country.**

**Focus Areas:**



**PM/Burning**



**Communication**



**Information**

**4. Monitoring (current FTE = 0.25):**

There are approximately 15 monitoring sites in Indian country in Region 10 with PM<sub>2.5</sub> continuous monitors (of which 10 currently report real-time data that is used for calling burn bans under the FARR); one site with continuous NO<sub>x</sub> and SO<sub>2</sub> monitors, and an ozone Federal Reference Monitor (FRM) monitor; 3 PM<sub>10</sub> FRM monitors; 2 PM<sub>2.5</sub> FRM monitors; and one site with an IMPROVE monitor. Region 10 provides technical and financial support to Tribes to run the monitors, and in some cases, Region 10 and Tribes collaborate with state agencies for operation of monitors and reporting of the data. In addition to data collection, running a monitor includes ensuring the data is quality assured and independent audits are conducted so that the data can be used for the purpose for which it is being collected. The Region 10 Air Program works with TTAU to provide technical and programmatic monitoring information for monitoring done through GAP grants.

One of EPA's goals is to increase Tribal involvement in the operation of monitors and the reporting and use of monitoring data. We will continue to evaluate the coverage of the monitoring network in Indian country and

look for opportunities to increase Tribal involvement in monitoring.

**Projects to Support these Goals & Objectives:**

***A. Finalize Regional Guidelines for Support of PM<sub>2.5</sub> Monitoring on Reservations –***

These guidelines will summarize the factors Tribes should consider in deciding whether monitoring is needed on a reservation and will also summarize applicable EPA monitoring regulations, monitoring methods, quality assurance and reporting requirements. These guidelines will assist Tribes in identifying which type of monitor and monitoring strategy would best serve to address air quality concerns of their Tribe. A draft of these guidelines is currently ready for internal review.

*Tasks:* Complete internal review, finalize guidelines and distribute to Tribes by May 2009.

*Lead:* Keith Rose

*Outcome:* PM<sub>2.5</sub> monitors are being operated at appropriate locations.

*Measure:* Guidelines are completed and distributed.

***B. Develop Guidelines for Support of Monitoring by Tribes in Alaska*** – These guidelines will be similar to the Regional Guidelines for Support of PM<sub>2.5</sub> Monitoring on Reservations, but will identify any special monitoring considerations that are unique to Alaska. These guidelines will summarize the factors Tribes should consider in deciding whether monitoring is needed in an Alaska Native Village or Tribal community and will also summarize applicable EPA monitoring regulations, monitoring methods, and quality assurance and reporting requirements. These guidelines will assist Tribes in identifying which type of monitor and monitoring strategy would best serve to address air quality concerns of their Tribe. EPA will collaborate with the State of Alaska Department of Environmental Conservation (ADEC) to seek a consistent approach to monitoring in rural Alaska.

*Tasks:*

1. Draft guidelines and complete internal review.
2. Finalize guidelines and distribute to Tribes by July 2009.

*Lead:* Keith Rose

*Outcome:* PM<sub>2.5</sub> monitors are being operated at appropriate locations.

*Measure:* Guidelines are completed and distributed.

***C. Monitoring Data Used for Regulatory Purposes*** – 40 CFR part 58, appendix A sets forth the requirements for monitors and data used for regulatory purposes. EPA will develop a summary of the key elements of Appendix A that we focus on in reviewing data that will be used for nonattainment and attainment determinations. This summary will be used by EPA staff and will be shared with Tribes.

*Tasks:*

1. By April 2009, complete internal review and finalize summary. Share summary with Tribes.
2. Review summary with each Tribe that operates a Federal Reference Method monitor.

*Lead:* Keith Rose, with support from Chris Hall

*Outcome:* Monitoring data intended to be used for regulatory purposes can be used for those purposes.

*Measure:* Monitoring data intended to be used for regulatory purposes can be used for those purposes. (outcome-based).

Summary is finalized and distributed.

***D. Air Quality System (AQS) Quarterly Completeness Reports*** – The AQS is EPA's repository of ambient air quality data. Tribes and State and local agencies collect data and submit it to AQS at least quarterly. EPA and other agencies rely on AQS to assess air quality, assist in attainment/nonattainment designations, perform modeling, and carry

out other air quality management functions. EPA will run quarterly completeness reports in AQS to verify that data is being submitted to AQS successfully.

*Tasks:*

1. Create a list of Tribes that have data that is supposed to go into AQS.
2. Run completeness reports each quarter and distribute reports to the air program.

*Lead:* Jan Noel, with support from Chris Hall

*Outcome:* Improved submittals (timely and complete).

*Measure:* Percent of Tribes with monitors that submit data to AQS.  
Number of non-submittal issues resolved.

***E. Annual Air Quality Data Assessment for Reservations*** – Summarize the air quality data collected for the year on reservations and assess data quality and completeness. Where adequate multiple years of data exist, a trend analysis will be conducted.

*Tasks:*

1. Draft a report each July for air quality data from the previous calendar year.
2. Distribute report internally and to Tribes.

*Lead:* Keith Rose, with support from Chris Hall, Rob Elleman, and Jan Noel.

*Outcome:* Air quality program managers will use assessment to inform decisions.

*Measure:* Reports are completed and distributed.  
Changes made in response to previous year's air quality data assessment.

***F. Website Links to Tribal Monitoring Data*** – To make it easier for reservation residents and Tribal and EPA staff to find real-time monitoring information, we will add links on our Region 10 Tribal Air Website to Tribes' monitoring data websites.

*Tasks:*

1. By December 2009, create an EPA website with a map of the monitors on Indian reservations in Region 10.
2. Add links from the map to the Tribal or State websites displaying the monitoring data for each monitor that is reporting data to a website.

*Lead:* Keith Rose

*Outcome:* Monitoring data is more accessible for the public and air quality staff.

*Measure:* Website is completed.  
Website hits.

***G. Speciation Study of Air Pollution on Makah Reservation*** – EPA has been supporting the Makah Tribe to operate an IMPROVE monitoring site on their Reservation, along with a nephelometer (a type of continuous PM<sub>2.5</sub> monitor), as part of a collaborative EPA-Tribal study of the sources of fine particulates (PM<sub>2.5</sub>), the contribution of these sources to total PM<sub>2.5</sub>, and daily concentrations and seasonal trends of PM<sub>2.5</sub> levels of emissions in this rural coastal community. The Makah Reservation, located on the Pacific Ocean at the entrance to the Strait of Juan de Fuca, is at a desirable location to be able to assist in determining the potential contribution of marine diesel sources to PM<sub>2.5</sub> concentrations. Data collection began in 2006 and will continue until three years of data have been collected. It is suspected that woodstoves, logging and marine related emissions may all contribute to the air pollution in this Tribal community.

*Lead:* Keith Rose

*Tasks:*

1. In 2009, Region 10 will begin preliminary analysis of the IMPROVE data using models, such as Positive Matrix Factorization, to identify source categories and the contribution of each source category to PM<sub>2.5</sub> loading.
2. In 2010, Region 10 will complete its analysis and will develop a written report with the results of the study.
3. In 2010, Region 10 and Tribal staff will jointly present on the project at an appropriate venue.

*Outcome:* Increased Tribal and EPA knowledge about the impacts of air pollution on rural coastal communities in the Pacific Northwest.

*Measures:*

Preliminary data analysis is completed.

Written report on results of the study is completed.

EPA and Tribal staff jointly give a presentation on the project.

**Goal: Protect air quality, human health, and the environment.**

**Objective: Help the public and regulated community understand the health effects of air pollution and the requirements in place to protect air quality.**

**Focus Areas:**



**PM/Burning**



**Air Toxics**



**Indoor Air**



**Communication**

**5. Outreach (current FTE = 1.0<sup>+</sup>):**

To make EPA's rules and programs more effective, it is important that the public understands the health effects of air pollution and what they can do to reduce emissions or reduce exposure. It is also important that the regulated community understands the requirements they must meet.

<sup>+</sup>This FTE is being supplemented with Anne Dalrymple's time and with student interns.

**Projects to Support these Goals & Objectives:**

**A. Air Quality Educational Package** – We will develop an air quality educational package that can be used by Tribal air staff, EPA, or teachers in the classroom. The materials developed would teach students the significance of clean air, the pollutants of concern (such as particulate matter and air toxics), how we test and monitor for these pollutants, and what they can do to preserve clean air. The package will include hands-on experiences and will include take away items that will help the students and their parents get engaged in improving their air quality. The package will have different modules covering topics such as open burning, the FARR, indoor air, woodstoves, and climate change. We will utilize existing materials as much as possible. The project workgroup will include EPA staff and interested Tribes.

*Tasks:*

1. Complete the educational package by September 2009.
2. In Fall 2009, hold a Tribal Air Outreach Workshop for

Tribes in Region 10 to share ideas on outreach and to kick off the educational package efforts.

3. Work with Tribes to present the air quality educational package throughout the 2009/2010 school year.

*Lead:* Gary Olson

*Outcome:* Increased knowledge and changes in behavior.

*Measure:* Number of presentations made at schools.

**B. Air Quality Calendar** – By September 2009, we will create a 2010 calendar with different air quality messages that can be given to students in conjunction with the Air Quality Educational Package.

*Tasks:*

1. Research calendar format options and brainstorm what air quality messages to include.
2. In spring 2009, hold art contests at Tribal grade schools for pictures to include in the calendar.
3. In fall 2009, distribute approximately 1,500 calendars to EPA and Tribal air quality staff that are visiting schools.

*Outcome:* Increased knowledge and changes in behavior.

*Lead:* Angel McCormack

*Measure:* Number of calendars distributed.

**C. FARR Hotline Magnet** – We will distribute magnets to advertise the FARR Hotline phone number.

*Tasks:*

1. Work with graphics to design and produce magnets. ✓*TASK COMPLETED*
2. Send magnets to all Tribal air quality staff. ✓*TASK COMPLETED*
3. By May 2009, send magnets to residents on one reservation.
4. By August 2009, evaluate effectiveness and determine whether we want to produce and distribute additional magnets.
5. Distribute magnets at air quality educational package presentations.

*Lead:* Gary Olson

*Outcome:* Increased knowledge of FARR requirements.

*Measures:* Number of magnets distributed.

Increase in the number of calls to the hotline due to magnet distribution. (outcome-based)

**D. Compliance Assistance Outreach for Mint Growers** – Mint is grown on the Yakama Reservation and is harvested at least two times a year between July and September. Following the harvesting and mint oil extraction, the mint slugs are left for disposal. Some farmers have found ways to utilize this material but others pile it up on their farms. We will work with the mint growers and the Yakama Nation to develop a plan for handling these slugs to minimize the possibility of catching fire and to maintain compliance with the FARR.

*Tasks:*

1. Research how others are handling mint slug disposal, best practices, and existing rules and regulations.
2. Work with the mint growers and the Yakama Nation to develop compliance assistance outreach material.
3. By June 2009, finalize the outreach material and meet with the Mint Growers Association to discuss.

*Lead:* Gary Olson and Jerry Craig

*Outcome:* Mint slug fires are prevented.

*Measure:* Mint slug fires are prevented (outcome-based).

Outreach material distributed.

Meeting attendance.

***E. Compliance Assistance Outreach for Orchard Growers*** – There are many orchards on the Yakama Reservation and over the past year, we identified a need to educate orchardists on the best ways to burn orchard trimmings to reduce air quality impacts and to maintain compliance with the FARR. EPA and the Yakama Nation met with Yakima Regional Clean Air Authority (YRCAA) to discuss this issue, and YRCAA provided their best practices material and background information to us.

*Tasks:*

1. Review the material provided by YRCAA and work with the Yakama Nation and the orchard growers to develop a fact sheet on open burning best practices and the requirements of the FARR.
2. By November 2009, finalize these materials and distribute them to the orchardists.

*Lead:* Jerry Craig

*Outcome:* Reduced impact from burning.

*Measure:* Fact Sheet is completed and distributed.

***F. Outreach for Orchardists Using Smudge Pots*** – Many cherry orchards, as well as other fruit orchards, are located on the Yakama Reservation. During the early spring, these crops can be subjected to temperatures below freezing, and some farmers use smudge pots to try to prevent frost and the loss of some of their crops. The use of smudge pots creates a significant amount of particulate and gases that can be detrimental to human health and the environment. For this reason, a project was completed in spring 2008 to look into alternative methods of frost prevention. Using the information gathered in this study and the recommendations made, we will work with the Yakama Nation to develop a plan for sharing this information with the orchardists.

*Tasks:*

1. Work with the Yakama Nation and the orchardists to determine how best to get this information to the orchardist community.
2. Develop materials to use for sharing this information with the orchardist community.
3. Disseminate these materials and information by the end of the winter of 2008-2009.

*Lead:* Gary Olson and Jerry Craig

*Outcome:* Use of smudge pots is reduced.

*Measures:* Use of smudge pots is reduced.

Fewer Complaints.

Number of contacts made for potential partnerships.

Number of orchardists receiving information.

Number of orchardists that modify or eliminate the use of smudge pots.

***G. Outreach and Education for Fire and Police Departments on the FARR*** – When the FARR was promulgated in June 2005, it established new restrictions on open burning on the 39 reservations in Idaho, Oregon, and Washington. Many of the fire districts and police departments that provide service on these reservations are not familiar with the FARR. It is important that these organizations understand what is covered under the FARR and the roles of the Tribes, EPA and themselves under these rules.

*Tasks:*

1. Communicate with Air Quality staff on the reservations and determine which reservations need this type of outreach.
2. Modify presentation to fit the need of the reservation.
3. By March 2009, schedule presentations for 2009.
4. From April through December 2009, travel to reservations to make presentations.

*Lead:* Gary Olson

*Outcome:* Increased knowledge of FARR requirements.

*Measure:* Number of reservations where presentation is given.

Number of people attending presentations.

***H. Update EPA Tribal Air Quality Website***– EPA Region 10's Tribal air webpages have not been updated recently with the national template, especially the FARR pages. Also, the new Strategic Plan information needs to be added to the website, and a number of additional changes are needed to make the pages more usable for the public and our Tribal partners.

*Tasks:*

1. Redesign current Tribal air homepage to reflect the national template and better organize the existing information.
2. Work with the EPA Web Team to update the website with new content, including Strategic Plan information.
3. Get feedback and comments from Tribal air staff.
4. Post final website by end of September 2009.

*Lead:* Anne Dalrymple

*Outcome:* Increased ability of public and Tribal staff to find current air quality information and tools.

*Measure:* Increase in the number of page hits. (Compare before and after page hits for consistent pages).

Feedback from a survey of fewer than 9 Tribal air staff that use the website before and after changes.

***I. Outreach and Education on Delegation Authority and Update of Prescriptions for Forestry, Agricultural and Open Burning on the Umatilla Reservation*** – EPA will work with CTUIR to develop an outreach and education plan on what the delegation agreement means and how to use the delegated authority to protect public health. EPA will also work with the Tribe to refine prescriptions for forestry, agricultural, and open burning. See page 43.

***J. Alaska Tribal Multimedia Air Outreach Project*** - To increase the understanding of the basic sources of air pollution in Tribal communities in rural Alaska, a multimedia approach to provide culturally appropriate information is needed that can be accessed by Tribes throughout Alaska. See page 48.

***K. Woodstove Best Management Practices Outreach*** – Because money for woodstove changeouts can be difficult to get, we also want to focus on educating homeowners on things they can do to make their woodstove burn cleaner. See page 56.

***L. Outreach and Education on the Health Impacts of Diesel Emissions*** – As stated above, one of the goals of the Collaborative is to raise awareness of the need for diesel emissions reductions. EPA will develop a fact sheet or brochure for Tribal communities providing information on the health impacts of diesel emissions. See page 62.

***M. Greenhouse Gas Reporting Rule Outreach*** - The Greenhouse Gas Reporting Rule (expected to be proposed in March/April 2009 and finalized in October/November 2009) will require mandatory reporting of greenhouse gas emissions above appropriate thresholds in all sectors of the economy. EPA will provide outreach to Tribes and to affected facilities on the proposed and final rules. See page 65.

**Potential Future Projects:** EPA currently does not have the resources for these projects. We do not plan to work on these projects unless additional resources become available.

***A. FARR Newsletter, volume 3*** – We developed the first FARR newsletter to publicize these new rules and to promote a better understanding of the requirements of the FARR. The second version of the newsletter highlighted implementation of the FARR and also included articles written by Tribes. In 2006, we distributed approximately 30,000 copies of the FARR newsletter, volume 1 and in 2008, we distributed approximately 35,000 copies of the FARR newsletter, volume 2. Volume 3 will include more articles contributed by Tribes.

*FTE Need* = 0.25 for one year.

**Goal: Protect air quality, human health, and the environment.**

**Objective: To support Tribes and State and local agencies in their efforts to protect the National Ambient Air Quality Standards.**

**Focus Areas:**



**PM/Burning**



**Communication**

**6. Air Quality Planning (current FTE = 0.4):**

EPA communicates and consults, when appropriate, with Tribes on State Implementation Plan (SIP) actions that may affect Tribes, such as setting National Ambient Air Quality Standards (NAAQS) standards, designations, regional haze SIP approvals, national rulemakings, specific SIP approvals, etc. EPA recently promulgated new standards for PM<sub>2.5</sub> and ozone, which will require new designations and new planning requirements. For new nonattainment areas that include Indian country, EPA will support, in consultation with the affected Tribe(s), the control measures that are appropriate for the area (for example, through development of a Federal Implementation Plan (FIP) or TIP or working with the Tribe to implement voluntary control measures).

The Air Planning Team also coordinates work on TIPs. There are currently no approved TIPs in Region 10 (there are two approved TIPs nationally). We are working with the Swinomish Tribe as they develop a TIP for open burning. Over the next five years, we expect one to two additional Tribes in Region 10 to begin to work on

developing a TIP.

**Projects to Support these Goals & Objectives:**

**A. Communication on SIP Revisions** - The Air Planning Team is beginning an effort to increase communication with Tribes on SIP actions by sending out lists of current and projected future SIP actions to Tribes annually.

*Tasks:*

1. Work with each State and local air agency to compile lists of projected future SIP revisions planned and SIP revisions submitted to EPA for approval.
2. Distribute these lists to Tribes by April of each year.

*Lead:* Debra Suzuki

*Outcome:* Tribal input is considered by State and local air agencies in development of their SIPs.

*Measure:* Lists are completed and distributed.

**B. Communication on Designations** – EPA has revised, or is in the process of revising, several NAAQS. In December 2006, EPA promulgated more stringent PM<sub>2.5</sub> standards; in March 2008, EPA promulgated more stringent ozone standards; and in May 2008, EPA proposed more stringent lead standards. It is important for Tribes to understand the

process for revising standards, the designation process, and the SIP development process, and EPA will continue to communicate with Tribes on these topics.

*Tasks:*

1. Create a fact sheet for Tribes on the PM<sub>2.5</sub> designation process by November 2008.  
✓*TASK COMPLETED*
2. Create a fact sheet for Tribes on the ozone designation process by March 2009.  
✓*TASK COMPLETED*
3. Identify opportunities to distribute the fact sheet and to talk with Tribes about the designation process.

*Leads:* Gina Bonifacino and Krishna Viswanathan

*Outcome:* Tribes understand the designation process.

*Measure:* Fact Sheets are completed and distributed.

**C. Fort Hall PM<sub>10</sub> Nonattainment Area** - The Fort Hall PM<sub>10</sub> Nonattainment Area is on the Fort Hall Indian Reservation in Idaho. Under the CAA, EPA is required to make a determination that the area has attained or that the area did not attain the PM<sub>10</sub> standard, with the eventual goal being to redesignate the area to attainment. EPA is increasing particulate matter monitoring in the area to help in making an attainment determination and will perform additional analyses to better understand the air quality in the area.

*Tasks:* By the date agreed to in the consent decree (October 2009), EPA will finalize a Federal Register Notice for the determination that the area has attained or that the area did not attain the PM<sub>10</sub> standard.

*Lead:* Donna Deneen

*Outcome:* Attainment Determination is made.

*Measure:* Attainment Determination is made (outcome-based).  
Monitoring, results, analyses, consultation are completed.

**D. Swinomish TIP** – The Swinomish TIP is focused on open burning and uses the FARR open burning provisions and existing Swinomish Tribal code as models. We are working closely with the Tribe as they develop their TIP since this is the first TIP in the Region.

*Tasks:*

1. Review and comment on drafts of the open burning regulations and provide guidance to the Tribe as they adopt the TIP and submit it to EPA for approval.
2. Act on the Tribe's Section 110 TAS submittal in support of the TIP.
3. Prepare a Federal Register Notice and supporting materials proposing TIP approval within one year of TIP submittal.

*Lead:* Debra Suzuki

*Outcome:* Improved management of open burning through a TIP.

*Measures:* Number of months between the official TIP submittal and TIP approval by EPA.

TAS and TIP submittals are submitted to EPA.

***E. Guidance on Regulatory Options for Tribes*** - To assist Tribes moving forward with CAA implementation, we will create a guidance document that explains the regulatory options Tribes have under the CAA. See page 11.

***F. Wapato Hills Puyallup River Valley PM2.5 Nonattainment Area Planning*** – In December 2008, the Wapato Hills Puyallup River Valley was designated as a PM2.5 nonattainment area. The Wapato Hills Puyallup River Valley nonattainment area is a multi-jurisdictional area with the Puyallup Tribe and EPA responsible for nonattainment area air quality planning activities on Puyallup Tribal trust lands and the State responsible for nonattainment area air quality planning activities on all other portions of the nonattainment area including non-trust areas within the boundary of the Puyallup Reservation. We will work with the Puyallup Tribe to determine the appropriate timing and roles for the nonattainment area planning for the Puyallup Tribal trust lands, with the eventual goal being to redesignate the area to attainment.

*Tasks:* In Spring 2009, begin discussions on PM2.5 planning with Ecology, Puget Sound Clean Air Agency and the Puyallup Tribe.

*Lead:* Gina Bonifacino

*Outcome:* Coordinated planning for the Wapato Hills Puyallup River Valley nonattainment area.

*Measures:* Kick off meeting is held.

**Goal: Protect air quality, human health, and the environment.**

**Objective: Issue permits to significant sources of air pollution.**

**Focus Areas:**



**PM/Burning**



**Air Toxics**



**Communication**



**Information**

**7. Permits:**

For sources in Indian country, EPA is the permitting authority for Title V permits, non-Title V permits under the FARR, and Prevention of Significant Deterioration (PSD) permits. EPA communicates and consults, when appropriate, with Tribes on permit actions that are located in Indian country or may affect Indian country.

**Projects to Support these Goals & Objectives:**

**A. Title V (current FTE = 0.5 - 1.25) -** EPA's Title V (Part 71) program requires major stationary sources and certain other sources to obtain an operating permit. The Title V permit includes all air pollution requirements that apply to the source, including emissions limits and monitoring, record keeping, and reporting requirements. Title V permits must be renewed every five years. There are 12 Title V sources in Indian country in Region 10.

*Tasks:*

We plan to issue / renew the following permits:  
2009: Colville Indian Precision Pine (initial permit), Clearwater Forest Industries (permit renewal), Warm Springs Forest Products / Warm Springs Biomass (permit modification), Williams Northwest Pipeline (renewal), Colville Indian Plywood and Veneer (renewal), Empire

Lumber (renewal)

2010: Jeld-Wen (initial); Three Rivers Timber (renewal), Potlatch Forest Products (initial), Warm Springs Forest Products / Warm Springs Biomass (renewal), Yakama Forest Products (initial),

*Leads:* Doug Hardesty and Dan Meyer

*Outcome:* Improved compliance with the FARR and other Federal rules.

*Measures:* Number of permits issued each year.

Number of months between permit application and permit issuance.

Percentage of planned permits issued.

**B. Non-Title V (current FTE = 0.8) -** The FARR includes a non-Title V operating permit program that can be used to establish federally-enforceable requirements for air pollution sources on Indian reservations. This permit can be used by sources who want to voluntarily limit emissions to become synthetic minor sources. We have issued 9 non-Title V permits in Indian country to date and have received an additional 4 non-Title V permit applications that have not yet been issued. We expect to receive around 3 non-Title V permit applications a year.

*Tasks:*

We plan to issue the following permits:

2009: Warm Springs Forest Products, Poe Asphalt, Washington Beef.

2010: Columbia, Jeld-Wen, Silgan.

*Leads:* Doug Hardesty, Heather Valdez, and Dan Meyer

*Outcome:* Sources have enforceable limits to ensure they qualify for desired major/minor source classification.

*Measures:* Number of permits issued each year.

Number of months between permit application and permit issuance.

Percentage of planned permits issued.

**C. PSD (current FTE = 0 since there are currently no permit applications) -** EPA's major new source review (NSR) program requires all new major sources and major modifications at such sources to obtain a permit before beginning construction. We call this program the PSD program in attainment areas (areas that are meeting the NAAQS). The permitting process includes an analysis of the impacts of the source and requires installation of control technologies to achieve certain emission limits. We have issued 1 PSD permit in Indian country to date.

**D. Tribal NSR Rule (current FTE = < 0.1) -** On August 21, 2006, EPA proposed two pre-construction permit (NSR) rules to fill a regulatory gap that currently exists in Indian country. The minor NSR rule would apply to new and modified minor sources and to minor modifications at major stationary sources. Sources would apply control technology, if any, as determined by the permitting authority on a case-by-case basis. The "nonattainment" major NSR program would apply to new major sources and major modifications at such sources in areas not meeting the NAAQS. Sources would be required to install Lowest Achievable Emission Rate (LAER) control technology, obtain emissions offsets, certify compliance, and perform a net air quality benefit analysis. The final rule is currently projected to be promulgated in 2009. EPA would be the permitting authority, and Tribes could request delegation to assist EPA with the administration of these rules. An EPA workgroup has been formed to plan for implementation of these rules, and Region 10 participates on this workgroup.

*Tasks:*

1. Prior to final promulgation of the Tribal NSR rule, Region 10 will work with headquarters to develop a plan for communicating and educating Regions, Tribes and sources on the requirements of the rules.
2. Within 1 month of final promulgation of the Tribal NSR rule, Region 10 will send information on the rule to all known potentially affected sources and Tribes.
3. Within 3 months of final promulgation of the Tribal NSR rule, Region 10 will assess resource needs for permitting responsibilities and will develop a strategy for filling this resource need.

*Lead:* Doug Hardesty

*Outcome:* Tribes and sources understand new permitting requirements.

*Measure:* Rule information is distributed.  
Resource assessment is completed.

**Goal: Protect air quality, human health, and the environment.**

**Objective: More effective regulations through enforcement and compliance assistance.**

**Focus Areas:**



**PM/Burning**



**Communication**



**Information**

**8. Compliance & Enforcement (current FTE = 2.0):**

EPA is responsible for compliance and enforcement of all CAA rules that apply in Indian country. In Region 10, there are two primary areas of air compliance and enforcement work in Indian country, the FARR and Title V (Part 71). This work includes conducting inspections, running the FARR hotline, complaint response, compliance determinations, enforcement follow-up, and compliance assistance. EPA and/or Tribes with inspector credentials inspect all Title V sources at least once every two years.

The types and extent of noncompliance that may occur under the FARR warrant a broad range of compliance and enforcement responses. In February 2008, EPA finalized civil penalty guidelines for the FARR that allow EPA to calculate penalties more appropriate for small, or minor, violations and for violations by small businesses and residents. During the first two years implementing the FARR, we focused on education, outreach, and compliance assistance. In 2007 and 2008, EPA began issuing warning letters and notices of violation. Beginning in late 2008, EPA will start escalating its enforcement response to violations of the FARR, utilizing the new FARR Civil Penalty Guidelines as

appropriate.

EPA is also working with Tribes that are seeking EPA inspector credentials where EPA and the Tribe find that it is in their interest and appropriate to do so.

**Projects to Support these Goals & Objectives:**

**A. FARR Compliance Assistance and Complaint Response Workshop** - This two-day workshop will bring together EPA and Tribes involved in implementing the FARR. We will discuss ways to help the public and regulated sources to better understand the requirements of the FARR and best practices for complaint/compliance response. Tribal staff are positioned to gather the information important to EPA for compliance and enforcement follow-up, and this workshop will help build capacity in this area. EPA will put on this workshop in fall/winter 2008.

✓ **PROJECT COMPLETED IN NOVEMBER 2008.**

**Lead:** Angel McCormack

**Outcome:** Improved compliance.

*Measure:* Number of Tribal staff that attend workshop. *12 Tribal staff attended.*

**B. Inspector Credentials Q&As** – Develop a list of Q&As that describes what Tribes can do with inspector credentials, what Tribes can do without inspector credentials, and Region 10’s criteria for when inspector credentials are appropriate.

*Tasks:*

1. Compile a list of questions from Tribes about inspector credentials.
2. At a conference call or meeting, discuss what can be done with inspector credentials and what can be done without inspector credentials.
3. By March 2009, document this discussion as a list of Q&As and distribute to Tribes.

*Lead:* Don Dossett

*Outcome:* Increased knowledge of the use of federal air inspector credentials.

*Measure:* Q&As are completed and distributed.

**C. Title V Inspections in Indian Country** – Title V inspections are carried out for air pollution sources that have obtained a Title V permit or have applied for one. These inspections normally take place at the facility at two year intervals unless there is a specific reason for an earlier inspection. They are normally conducted by EPA accredited inspectors in conjunction with the Tribal air staff. As of August 2008, there are two Tribes in Region 10 with CAA inspector credentials. The Nez Perce and Coeur d’Alene Tribes have staff with inspector credentials and they will be taking over the responsibility of Title V inspections on their respective Reservations. A Title V Inspection is basically a full compliance evaluation of the facility with respect to their Title V permit and the CAA. Inspections are one of the key components EPA uses to protect human health and the environment by ensuring that the regulated community obeys environmental laws/regulations through on-site visits by qualified inspectors and a review of the information EPA or a Tribe requires to be submitted. Inspections are a way to find out how well the facilities understand and follow their permit requirements; inspections provide a way to provide compliance assistance to the facilities; and inspections provide an opportunity to discover changes or modifications that should be made to the permits.

*Tasks:*

1. Prior to conducting the inspection, conduct a full review of the EPA source files for the facility to be inspected and check that all documentation required by the permit has been received.
2. Check the EPA website ‘Online Tracking Information System’ and obtain a print out of the Detailed Facility Report for the facility to be inspected. The report contains all relevant information regarding this facility over the previous three to five years from the Office of Enforcement and Compliance Assurance.
3. At the site, the inspection is normally conducted in three parts: pre-inspection conference, facility walk-through and post-inspection conference.

4. **Pre-inspection conference:** This is a meeting attended by the facility representatives and inspection team to explain the purpose of the visit and how the inspection will be conducted. At this meeting, the facility staff is normally advised of the documentation that will have to be produced at the post-inspection conference for examination. They are also advised of the emission units, monitoring and emission control equipment, etc. that will be visited during the inspection.
5. **Facility-walk through:** The walk through normally follows the flow diagram of the facility in order to get a full understanding of the process. Observations are made of the emission units, operating equipment, monitoring and emission control devices. Photographs are taken as necessary to record specific topics of interest with permission from the facility staff. Opacity readings are taken, as applicable, to determine compliance.
6. **Post-inspection conference:** At this meeting the result of the walk through is discussed and any concerns are raised with the facility regarding equipment, emissions, etc. observed during the inspection. The documentation asked for at the pre-inspection conference is submitted and examined and any missing documentation is recorded for later submission.
7. **Inspection Report.** A full compliance evaluation is prepared by the lead inspector upon their return and submitted to the Unit Manager of Air and RCRA Compliance.
8. **Compliance Evaluation.** The inspection report and compliance evaluation is reviewed by a member of the Air and RCRA Compliance Unit. In the case of noncompliance, a discussion is held with the Unit Manager and an attorney from the Office of Regional Counsel (ORC) to determine whether or not follow-up enforcement action will occur. Enforcement discretion, an informal enforcement action, or formal enforcement action may be utilized.

*Lead:* Bill Todd, Gary Olson, and Rindy Ramos.

*Outcome:* Improved compliance.

*Measures:* % of facilities that are in compliance.

Time between identification of noncompliance and the return to compliance.

Number of Days between referral to the Office of Compliance and Enforcement (OCE) and issuance of a Notice of Violation.

***D. Compliance Assistance Outreach for Mint Growers*** – We will work with the mint growers and the Yakama Nation to develop a plan for handling mint slugs to minimize the possibility of catching fire and to maintain compliance with the FARR. See page 26.

***E. Compliance Assistance Outreach for Orchard Growers*** – We identified a need to educate orchardists on the best ways to burn orchard trimmings to reduce air quality impacts and to maintain compliance with the FARR. See page 27.

***F. Outreach and Education for Fire and Police Departments on the FARR*** – Many of the fire districts and police departments that provide service on these reservations are not familiar with the FARR. It is important that these organizations understand what is covered under the FARR and the roles of the Tribes, EPA and themselves under these rules. See page 28.

***G. Research Delegation of FARR Enforcement Authority*** – We will research the possibility of revising the FARR to allow delegation of enforcement authority and will communicate our findings internally and to Tribes. See page 12.

***H. Complaint Response*** – A FARR Hotline was established to deal with citizen complaints associated with potential violations of the FARR. This Hotline is a dedicated line where residents living on or near an Indian Reservation in Idaho, Oregon and Washington can call to report an air pollution problem occurring in their area. They can also get information about the FARR, burn bans, etc. The FARR website also can be used to input complaints. For a successful complaint response system, it is critical to insure that people know of its existence, and that they are aware of the actions taken as a result of their complaint.

Several Tribes have delegation under the FARR for complaint response, and in those cases, residents call the Tribes directly and the Tribes are responsible for responding to any complaints.

A number of outreach efforts have been and will continue to be undertaken to inform the appropriate population about this complaint system. Some of these are described elsewhere in the strategy.

*Tasks:*

1. Continue to answer and respond to the complaint calls that are received on the hotline in a timely fashion.
2. Record these calls in the FARR Database so that there is a record of the types of issues, frequency, source, etc that we are dealing with.
3. Communicate with the Air Quality Staff of each Tribe so that they understand these issues and are able to get involved as necessary. Also work with the Tribes that have taken on responsibility for their own complaint response system.
4. Review quarterly data from EPA database as well as from delegated Tribes.

*Lead:* Gary Olson with support from Jerry Craig and Bill Todd

*Outcome:* Better compliance with the FARR.  
Complaints are handled in a timely fashion and outcomes are known by the complainant.

*Measures:*

Number of complaints, number of days to close a complaint, % complainants aware of outcome, % of complainants satisfied with the outcome, # of repeat incidents, type of

complaint and location of complaint, percentage of complaints that receive an on-site visit as follow-up.

Number of Days between referral to the Office of Compliance and Enforcement and issuance of a Notice of Violation

***I. Develop Example Fugitive Particulate Matter Surveys and Plans*** – We identified a need to educate sources on the requirement to perform surveys and develop plans under the fugitive particulate matter rule in the FARR.

*Tasks:*

1. By June 2009, prepare example fugitive particulate matter surveys and control plans for different types of facilities (e.g., gravel pits, sawmills, etc).
2. By June 2009, develop a list of companies for targeted compliance assistance.
3. Provide compliance assistance as needed.

*Lead:* Bill Todd

*Outcome:* Reduction in fugitive particulate matter emissions.

*Measure:* Improved compliance with the FARR.

Example fugitive particulate matter surveys and plans are developed and distributed.

**Goal: Protect air quality, human health, and the environment.**

**Objective: Implement the FARR and address regulatory gaps through FARR revisions.**

**Focus Areas:**



**PM/Burning**



**Communication**



**Information**

**9. FARR (current FTE = 3.5):**

The FARR establishes a regulatory program to protect human health and air quality on 39 Indian Reservations in Idaho, Oregon, and Washington. The FARR provides important tools to manage air quality and to support Tribes in building capacity to run their own air quality programs. These precedent-setting rules are the first time EPA and Tribes have taken on the challenge of direct, on-the-ground implementation of the CAA on such a large scale. The rules include provisions that limit pollution from industrial sources, restrict open burning, require burn permits on certain reservations, require sources to register and report their air emissions, and allow EPA to delegate authority to Tribes to assist in rule implementation.

The FARR has been in place since 2005, and there are many activities that EPA and Tribes will continue to do to implement the FARR.

**Projects to Support these Goals & Objectives:**

**A. FARR Rulemakings** – The FARR does not apply to two new reservations (Samish and Snoqualmie) or to the one Reservation in Alaska (Annette Island Reserve of the Metlakatla Tribe). We will consider extending the FARR to these reservations, and we have identified approximately 30 revisions we could make in future rulemakings, ranging from fixing typos to adding whole new rules. Many of the revisions being considered would improve implementation of the FARR based on EPA’s and Tribes’ experience in implementing the rules. EPA will begin several rulemakings over the next four years. The targeted completion dates for these rulemakings are listed below. As part of the rulemaking process, EPA will seek early input from Tribes and will consult as appropriate.

*Tasks:*

- 2009 – Complete rulemaking(s) for corrections and revisions to improve implementation;
- 2010 – Complete rulemaking(s) for additional revisions to improve implementation, to extend the FARR to other reservations or other Indian country lands, and to extend the additional rules in the FARR to other reservations, as necessary or appropriate; and
- 2011 – Complete rulemaking(s) to add new rules or to make significant revisions to existing rules.

*Lead:* Debra Suzuki

*Outcome:* Better air quality protection, improved air quality, fewer emissions, etc.

*Measures:*

Rulemakings are completed.

Number of months between initiating a rulemaking and rule finalization.

**B. Permit Fees** – Research the feasibility of adding federal burn permit fees to the FARR to support the work of Tribes that have delegation of the burn permit rules.

✓ *PROJECT COMPLETED IN JANUARY 2009. THIS INFORMATION WILL BE USED IN FARR RULEMAKING PROCESS – PROJECT 9.A.*

*Lead:* Rich McAllister

*Outcome:* Decision to pursue or not is made.

*Measure:* Recommendation is made.

**C. Trust Lands Outside Reservations** – Evaluate the options for regulatory approaches to extend the FARR to Tribal trust lands outside reservations (including the situation in Oregon, where a number of Tribes have reservations comprised of several non-contiguous parcels of Tribal trust land).

✓ *PROJECT COMPLETED IN JANUARY 2009. THIS INFORMATION WILL BE USED IN FARR RULEMAKING PROCESS – PROJECT 9.A.*

*Lead:* Rich McAllister and Debra Suzuki

*Outcome:* Decision to pursue or not is made.

*Measure:* Option paper is completed.

**D. FARR Registration Analysis** – We will create registration reports and will analyze the registration information to make recommendations on what individual sources, source categories, activities, and pollutants we should focus on for inspections, outreach and compliance assistance, compliance determinations, or additional rule revisions. See page 18.

**E. Air Quality Educational Package** – We will develop an air quality educational package that can be used by Tribal Air Staff, EPA, or teachers in the classroom. The package will have different modules, covering topics such as open burning, the FARR, indoor air, woodstoves, and climate change. See page 25.

**F. FARR Delegation Discussion at a Meeting with Tribes** – The purpose of this project is to improve the understanding of the implications of delegation so that non-delegated Tribes can assess their need and desire to seek delegation of certain provisions of the FARR. See page 12.

**G. FARR Hotline Magnet** – We will distribute magnets to advertise the FARR Hotline phone number. See page 26.

**H. Compliance Assistance Outreach for Mint Growers** – We will work with the mint growers and the Yakama Nation to develop a plan for handling mint slugs to minimize the possibility of catching fire and to comply with the FARR. See page 26.

**I. Compliance Assistance Outreach for Orchard Growers** – We identified a need to educate orchardists on the best ways to burn orchard trimmings to reduce air quality impacts and to comply with the FARR. See page 27.

**J. Non-Title V Permits** - The FARR includes a non-Title V operating permit program that can be used to establish federally-enforceable requirements for air pollution sources on Indian reservations. See page 33.

**K. FARR Compliance Assistance and Complaint Response Workshop** - This workshop will bring together EPA and Tribes involved in implementing the FARR to discuss ways to help the public and regulated sources to better understand the requirements of the FARR and best practices for complaint/compliance response. See page 36.

✓ **PROJECT COMPLETED IN NOVEMBER 2008.**

**L. Outreach and Education for Fire and Police Departments on the FARR** – Many of the fire districts and police departments that provide service on these reservations are not familiar with the FARR. It is important that these organizations understand what is covered under the FARR and the roles of the Tribes, EPA and themselves under these rules. See page 28.

**M. Outreach and Education on Delegation Authority and Update of Prescriptions for Forestry, Agricultural and Open Burning on the Umatilla Reservation** – The Confederated Tribes of the Umatilla Indian Reservation (CTUIR) is in its second full year of implementing its smoke management program under a FARR delegation. EPA will work with the Tribe to develop an outreach and education plan on what the delegation agreement means and how to use the delegated authority to protect public health. EPA will also work with the Tribe to refine prescriptions for forestry, agricultural, and open burning.

*Tasks:*

1. By June 2009, hold planned outreach sessions.
2. By June 2009, update prescriptions.

*Lead:* Angel McCormack

*Outcome:* Reduced emissions from burning and improved smoke management and coordination between agencies regarding burning and smoke management.

*Measure:* Number of outreach sessions completed and who attended.

Better awareness of the Tribe's program and its authorities.  
Prescriptions are updated regarding specific burning.  
Program is modified in areas identified in assessments.

***N. Research Delegation of FARR Enforcement Authority*** – We will research the possibility of revising the FARR to allow delegation of enforcement authority and will communicate our findings internally and to Tribes. See page 12.

***O. Complaint Response*** – In order to deal with citizen complaints associated with the potential violations of the FARR, a FARR Hotline was established. This Hotline is a dedicated line where residents living on or near an Indian Reservation in Idaho, Oregon and Washington can call to report an air pollution problem occurring in their area. They can also get information about FARR, the FARR registration rule, burn bans, etc. See page 39.

***P. FARR Database Development*** – With the implementation of the FARR, a lot of information is being collected about air pollution sources, emissions, contact information, complaints, and outreach. To organize all this information, a database will be developed to allow efficient entry of information and generation of reports.

*Tasks:*

1. Combine two existing databases (registration and contacts) into a single database with a common interface by December 2008.

✓***TASK COMPLETED***

2. Generate intranet based forms for easy entry of data from various sources by December 2008.

✓***TASK COMPLETED***

3. Develop report forms by January 2009.

✓***TASK COMPLETED***

4. By February 2009, provide document storage/retrieval capability.

✓***TASK COMPLETED***

5. By May 2009, implement management tools to allow maintenance by non-technical personnel.

6. Provide training and assistance to personnel on use of the database tools.

7. Work with Tribes to facilitate quarterly data reporting to EPA so that FARR-related data and reports can be easily exchanged between the Tribes' and EPA's databases.

*Lead:* Jim Hazel

*Outcome:* FARR information is readily accessible.

*Measure:* Use of database by EPA staff to get needed information.

***Q. FARR Burn Bans*** – The purpose of the FARR burn bans is to prevent the occurrence of unhealthy air pollution episodes within reservations in Region 10. The FARR authorizes the Regional Administrator to declare air stagnation advisories (ASAs) or burn

bans on reservations based on meteorological conditions or measured air pollutant concentrations. An ASA is issued whenever meteorological conditions over a large area are conducive to the buildup of air pollution. When an ASA occurs, all open burning is prohibited. Open burning is also prohibited under a burn ban if the Regional Administrator determines that the accumulation of air pollutants in any place is approaching (or has reached) levels that could lead to a threat to human health. Prior to declaring a burn ban for any reservation, Region 10 will consult with the National Weather Service, affected Tribes, and State and local air agencies.

Several Tribes have delegation under the FARR for calling burn bans, and in those cases, the Tribes are responsible for calling burn bans for their reservations.

*Tasks:*

1. When there is indication of a potential need for a burn ban, we will coordinate a call with Tribes to communicate what we know and find out information on area specific conditions from Tribal staff.
2. Once Region 10 decides to issue an ASA or burn ban, we will issue a press release to the media (newspapers, television and radio stations), notify concerned individuals and organizations by email, and post the status of the ASAs and burn bans daily on the Region 10 website and on the outgoing message on the FARR Hotline.

*Lead:* Gary Olson, with support from Keith Rose and Rob Elleman.

*Outcome:* Reduced emissions and impacts during periods of impaired air quality.

*Measures:* Air pollution levels decrease when a burn ban is called.

**R. Scoping Project for Evaluations of FARR Delegations** - This work element is to recommend a process for conducting FARR delegation evaluations. Each delegation agreement contains a provision to conduct an annual evaluation. We will develop a process for the evaluations and determine what agreements to evaluate and how frequently to evaluate them. We will also recommend how to integrate FARR delegation evaluations into other evaluation processes, such as the oversight of grant workplans, air program evaluations, and annual regional smoke management program evaluation.

*Tasks:*

1. By April 2009, establish the goals and objectives of the evaluation and identify a team of Tribal air staff to assist in developing evaluation procedures.
2. By July 2009, draft procedures and distribute for review.
3. By September 2009, finalize document.
4. By December 2009, conduct evaluation of one Tribe.

*Lead:* Steve Body

*Outcome:* An evaluation process would be developed and documented.

Determination of whether resources are being effectively used to protect human health and meet obligations under the delegation agreement.

*Measures:* A scoping document is prepared.

*S. Develop Example Fugitive Particulate Matter Surveys and Plans* – We identified a need to educate sources on the requirement to perform surveys and develop plans under the fugitive particulate matter rule in the FARR. See page 40.

**Potential Future Projects:** EPA currently does not have the resources for these projects. We do not plan to work on these projects unless additional resources become available.

**A. FARR Newsletter, volume 3** – We would develop volume 3 to include more articles contributed by Tribes. See page 26.

**Goal: Protect air quality, human health, and the environment.**

**Objective: Provide support for Alaska Tribes as they build their understanding of and capacity to address the air quality concerns in their communities.**

**Focus Areas:**



**PM/Burning**



**Indoor Air**



**Air Toxics**



**Communication**



**Information**

**10. Tribes in Alaska (current FTE = 0.25):** OAWT currently manages two to three grants for Tribes or Tribal consortia in Alaska intended to increase their understanding of the causes and prevention of air pollution in their communities. Federally recognized Tribes and Tribal consortia are eligible for EPA financial support to participate in CAA related activities under 1) GAP for baseline assessments and capacity building; and 2) CAA Section 103 for projects to investigate the causes and prevention of air pollution. Under the current allocation formula used by OAR for distributing State and Tribal Assistance Grants (STAG) funds to the Regions, approximately \$250,000 of Region 10's Tribal Air STAG funds can be attributable to the 229 Tribes in Alaska. Region 10 seeks to devote an equivalent amount to addressing their air-related concerns. Because only one of the 229 federally recognized Tribes in Alaska has a reservation (the Annette Island Reserve of the Metlakatla Tribe), the State of Alaska has regulatory responsibility for air pollution within or impacting most Tribal communities.

Region 10 has sought to work collaboratively with the state of Alaska and Tribes in seeking solutions to the air quality problems that challenge these rural Tribal communities. To date we have provided support through funding direct grants, mini-grants, and training through entities such as the Alaska Inter-Tribal Association (AITC), ITEP, Rural Alaska Rural Community Action Program (RurALCAP), Alaska Building Science Network, and others. Collaboration with ADEC is currently supporting **road dust** monitoring projects as well as workgroups to look for multi-agency solutions

for this issue in the rural communities. **Indoor air quality** problems have been targeted through grants awarded to RurALCAP to train their Americorps volunteers on recognizing and addressing common indoor air quality problems, so that they can return to their communities and conduct outreach to raise individual awareness of the risks and solutions. Pilot projects have been initiated through a grant to AITC, in collaboration with the University of Montana, to do air-related science **environmental education** in high schools that involves students in measuring indoor air quality in their own homes and developing outreach to reduce risks. Additionally, the air program supports a SEE Employee jointly with the Region 10 Solid Waste Team so that this individual can also focus efforts on reducing the air pollution generated by the common practices of solid waste burning.

Region 10 has sought to increase the awareness and understanding of EPA headquarters of the unique air-related concerns and challenges faced by Tribes in Alaska.

**Projects to Support these Goals & Objectives:**

**A. Alaska Rural Road Dust Project** - Road dust is a ubiquitous problem for residents of rural Tribal communities throughout much of Alaska. Many Tribal villages throughout the central, north and west portions of Alaska are off the state highway road system, but have a mile to several miles of dirt roads. During the dry season, this dust becomes airborne through the daily use of four-wheelers driving up and down the roads. Paving roads is prohibitively expensive and difficult to maintain, with the roads becoming covered in dust not long after their construction. Solutions to this problem are needed to prevent levels of PM<sub>10</sub> from creating health hazards and exceeding the NAAQS. A workgroup of organizations and agencies with an interest in helping address this issue has been initiated to collaboratively seek appropriate solutions and funding to mitigate this problem.

Tasks:

1. Facilitate communication and networking between EPA and ADEC's Air Quality Program to identify roles and responsibilities with regard to road dust in Tribal communities.
2. Work with ADEC to support monitoring of road dust in one or two communities to measure the levels of PM<sub>10</sub>, to the extent that such monitoring will assist in documenting the road dust problem.
3. Identify and involve other potential agencies that have expertise or a role to play in addressing road dust; then include them in ongoing communication to develop a model approach. A description of a model approach will be drafted by December 2009.
4. Investigate viability of using pilot projects to try out different approaches to the implementation and funding of dust mitigation programs.
5. Share results of dust mitigation projects with Tribes throughout Alaska.

*Lead:* Mary Manous and/or Keith Rose with Mahbubul Islam

*Outcome:* Reduction in the levels PM<sub>10</sub> in rural Tribal communities.

*Measures:* Number of communities that have implemented ongoing road dust reduction measures.

Number of communities that have reduced road dust to a manageable level after implementing a mitigation program.

**B. Alaska Tribal Multimedia Air Outreach Project** - To increase the understanding of the basic sources of air pollution in Tribal communities in rural Alaska so that individuals, leaders, and staff can know what causes air pollution, how it may be impacting public health, and what they can do to reduce the amount of pollution or the severity of its impact, a multimedia approach to provide culturally appropriate information is needed that can be accessed by Tribes throughout Alaska. This project

will create web pages on EPA Region 10's website with information on the basic sources of air pollution in rural Alaskan Tribal communities – road dust, diesel combustion, solid waste burning, indoor air quality, and woodstoves - through downloadable fact sheets and short videos. These materials will also be made available on DVDs for distribution and use throughout Tribal communities in Alaska.

*Tasks:*

1. By October 2008, have subject matter experts within Region 10 provide the text for and then develop the culturally appropriate fact sheets on each of the topics for printing and posting on the website and inclusion in the DVD.
2. By October 2009 use a contract to have the short videos made and webpages designed using Native Alaskan videographers and subjects to the greatest extent possible and produce a DVD with all materials for distribution. Get feedback from Alaska Native staff throughout the process on the cultural appropriateness of the materials.
3. By December 2009, demonstrate the use of the website and DVDs at a statewide conference in Alaska and distribute DVDs to environmental or other Tribal staff for use in outreach to their communities.
4. By March 2010, evaluate the use of the website, fact sheets and DVDs.

*Lead:* Mary Manous

*Outcomes:*

Increased awareness within Alaska Tribal communities of behaviors that produce air pollution and its impacts on public health and the environment.

Reduced air pollution from road dust, diesel combustion, woodstove use, solid waste burning, and indoor air quality problems.

Reduced asthma and other related health impacts in the Tribal communities that have made use of the information.

*Measures:*

Number of hits on website indicating its use.

Number of DVDs distributed to Alaska Tribal staff or leaders for use in conducting outreach in their communities.

Number of events at which the DVD is utilized to raise awareness on air pollution and its health impacts.

***C. Burn Units in Alaska*** – With few options for the management of solid waste, residents in rural Alaska often burn waste to reduce volumes. The burning of waste in low technology devices can lead to the emissions of air toxics and other air pollutants. In February 2008, EPA awarded a grant to research technologies that (a) reduce the volume of solid waste while minimizing air pollution, (b) are still affordable and easily operated, and (c) meet the needs of Tribes in Alaska.

*Tasks:* By the end of March 2009, Region 10 will distribute to Tribes a report on this research.

*Lead:* Heather Valdez

*Outcome:* Fewer air emissions from waste combustion.

*Measure:* Report is distributed.

Number of Tribes utilizing new technology developed under this research grant.

***D. Develop Guidelines for Support of Monitoring by Tribes in Alaska*** – These guidelines will summarize the factors Tribes should consider in deciding whether monitoring is needed in an Alaska Native Village or Tribal community and will also summarize applicable EPA monitoring regulations, monitoring methods, and quality assurance and reporting requirements. See page 22.

***Potential Future Projects:*** EPA currently does not have the resources for these projects. We do not plan to work on these projects unless additional resources become available.

***A. Place-based Tribal Air Liaison in Alaska*** - Support a position in the Alaska Operations Office or another Alaska location with an individual having established experience and credibility working with Tribes in Alaska on environmental issues who can better support them in building capacity with regard to managing air pollution sources within their communities. With the increasing interests and concerns of Tribes in Alaska with ambient and indoor air quality problems, as well as climate change, it is important to have an individual who is focused on these issues located in Alaska. This person would be able to stay involved on a daily basis with the air quality issues of the 229 Tribes in Alaska.

*FTE Need:* 0.50 - 1.00 FTE

***B. Core Air Quality Tribal Team for Alaska*** - Develop a core group of interested EPA staff to focus on the air-related needs of Tribes in Alaska in a broad and global way that would include road dust, solid waste burning, diesel impacts, indoor air quality, mining and mineral extraction risks and climate change. The team would work to ensure that EPA Region 10 is appropriately addressing the air concerns in a collaborative, effective and efficient way to best protect Tribal health and the environment in Alaska within available resources.

*FTE Need:* 0.10 FTE

**Potential Future Projects continued** : EPA currently does not have the resources for these projects. We do not plan to work on these projects unless additional resources become available.

***C. Mining, Mineral Extraction and Oil Exploration*** - Work to ensure that air related issues and concerns are identified and communicated between Tribes in Alaska and EPA on mining, mineral extraction and oil exploration issues. To carry out its trust responsibilities to Alaska Tribes, the Air Program would seek to stay informed on these projects and facilitate communication with Tribes as issues are identified.

*FTE Need:* 0.10 FTE

***D. Air Quality Assessment Training for Tribes in Alaska*** – EPA would work with ITEP, ADEC, and OAQPS to develop an assessment protocol and training course for Tribal environmental staff on how to conduct an evaluation of air quality that is relevant for Tribes in Alaska to better understand the sources of air pollution that are impacting their communities. See page 18.

***E. Air Quality Conference for Tribes in Alaska*** - EPA would work Tribes, ADEC and other interested organizations to put on a conference devoted to air quality related topics impacting Tribes in Alaska, including road dust, solid waste burning, woodstoves, diesel generators, indoor air quality and climate change.

*FTE Need:* 0.10 FTE

**Goal: Protect air quality, human health, and the environment.**

**Objective: Manage burning to reduce smoke impacts.**

**Focus Areas:**



**PM/Burning**



**Communication**



**Information**

**11. Smoke Management (current FTE = 0.70):**

Agricultural, forestry and open burning are significant sources of air pollution in Region 10. Smoke intrusion into populated areas may lead to adverse health impacts, and smoke can also impair visibility in National Parks and wilderness areas. We work in partnership with Tribes, States, and other agencies that manage smoke, all other interested and affected agencies, and stakeholders to discuss how these types of burning are managed, to help identify areas where improvements are needed, and to help implement program improvements.

The burn permit provisions under the FARR apply on the Nez Perce and Umatilla Reservations. EPA provides support to the Nez Perce Tribe and CTUIR, who manage the FARR burn permit programs on their Reservations under FARR delegation agreements.

**Projects to Support these Goals & Objectives:**

***A. Annual Smoke Management Program Evaluations –*** EPA will develop a tool to assist in providing feedback and input to State, Tribal and other agency smoke

management programs in the region that can be used in self-evaluations of their own smoke management programs. The tool would be used to standardize results of program evaluations. The Coeur d'Alene Tribe, the Nez Perce Tribe and CTUIR evaluate their smoke management programs (agricultural, forestry, and open burning) each year. As part of the process of annual evaluations EPA will be conducting on smoke management programs throughout the region, EPA will provide written feedback and input as part of the Tribes' self-evaluations of their smoke management programs. The evaluations are used to measure program performance and identify possible improvements. The Coeur d'Alene and Nez Perce Tribes also hold public meetings to gather information on program performance.

***Tasks:***

1. By April 2009, draft a procedures outline for programs to use when assessing smoke programs.
2. By April 2009, develop a smoke management advisory/technical team for discussions and evaluating the programs.
3. By May 2009, solicit input from smoke management program managers on development of the tool.
4. By June 2009, get broader agency review of tool.
5. By August 2009, finalize tool.

6. By October 2009, set up technical training/assistance on how to assess the programs, how to use the tools, and where further improvements can be made with the assessment tools.
7. Provide support, as needed, to Tribes as they evaluate their programs.
8. Attend, as appropriate, the Tribes' public meetings at the end of each burn season.
9. Review the Tribes' annual evaluation and provide written feedback and recommendations as appropriate.
10. Follow up to ensure recommended improvements are made.
11. Participate at least quarterly on conference calls to get updates on how the programs are going.

*Leads:* Mike McGown (Nez Perce and Coeur d'Alene) and Angel McCormack (Umatilla), with support from Steve Body

*Outcome:* Improved smoke management and reduced impacts from smoke.

*Measures:* Recommended program improvements are implemented. (outcome-based)  
Number of complaints received regarding agricultural or forestry burning. (outcome-based)  
Tool is completed.  
Evaluations are completed.  
Number of assessments completed by EPA and regional smoke management programs.

***B. Plan for the Development of a Smoke Management Program on the Yakama Reservation*** – EPA and the Yakama Nation will develop a plan and timeline for the development of a smoke management program. The Yakama air program is newly staffed and will need to assess and build capacity to deal with burning issues on the Reservation. This plan will identify resource needs for the Tribe and for EPA for plan implementation.

*Tasks:*

1. By June 2009, finalize a plan for the development of a smoke management program. This plan will begin with a voluntary program focused on raising awareness and may progress to a more regulatory program.
2. By July 2009, Yakama Nation will implement a voluntary burn program.

*Outcome:* Improved smoke management and reduced impacts from smoke.  
Improved capacity of Yakama Nation to manage smoke.

*Lead:* Angel McCormack

*Measure:*

Plan is completed.  
Plan is implemented.

***C. Outreach and Education on Delegation Authority and Update of Prescriptions for Forestry, Agricultural and Open Burning on the Umatilla Reservation*** – EPA will work with CTUIR to develop an outreach and education plan on what the delegation agreement means and how to use the delegated authority to protect public health. EPA will also work with the Tribe to refine prescriptions for forestry, agricultural, and open burning. See page 43.

***D. Regional Smoke Management Coordination*** – Our goal is the continuing improvement of all smoke management programs in Region 10. Part of this improvement is the coordination and communication among all parties involved in burning and regulating burning to make better burn decisions. We plan to hold regular meetings to: 1) identify barriers to improved coordination and communication among agencies managing smoke, 2) discuss actions that can be taken to improve communication and coordination among agencies involved in burning and managing smoke from forest, range, and agricultural lands for resource management, and 3) determine how to implement actions and track progress of implementation. We also plan to explore creating an email listserver to facilitate communication.

*Tasks:*

1. Plan an executive level smoke management conference call in February 2009.  
✓**TASK COMPLETED**
2. Plan annual regional smoke management meetings.

*Lead:* Steve Body

*Outcome:* Increased coordination and collaboration between agencies.

*Measures:*

Executive conference call and annual meeting are held.

Documentation of increased coordination and collaboration between agencies. (outcome-based)

***E. Revise the Smoke Management Memorandum of Agreement (MOA) between the Nez Perce Tribe, EPA, and the State of Idaho*** – EPA will work with the Nez Perce Tribe and the State of Idaho to update the MOA to reflect the State’s new smoke management program for the off-Reservation area of the Clearwater Airshed and the transfer of the smoke management program from the Idaho State Department of Agriculture to the Idaho Department of Environmental Quality.

*Tasks:* The MOA will be revised by July 2009.

*Lead:* Mike McGown

*Outcome:* Improved coordination and cooperation between the three parties.

*Measure:* MOA is revised.

**Potential Future Projects:** EPA currently does not have the resources for these projects. We do not plan to work on these projects unless additional resources become available.

***A. Develop Smoke Management Guidance*** – We would tailor existing guidance (e.g., WRAP guidance, Wildland Fire Guidance) for use by Tribes in Region 10 that are beginning a smoke management program. This guidance would cover both regulatory and voluntary programs and describe the advantages of each.

*FTE Need = 0.25* for one year.

***B. Regional Tribal Emissions Inventory for Indian Country in Idaho, Oregon, and Washington*** – Open burning information would be included in the data collected under this potential future project. See page 18.

**Goal: Protect air quality, human health, and the environment.**

**Objective: Reduce residential woodsmoke.**

**Focus Areas:**



**PM/Burning**



**Indoor Air**



**Communication**



**Information**

**12. Woodstoves and Residential Woodsmoke (current FTE = 0.125):**

Residential woodsmoke has reemerged as an important air quality issue in Region 10. Recognizing the opportunity to make progress towards healthy air and towards implementing the new tighter particulate standards, Region 10 has been focusing on raising the profile of this issue, bringing information and resources to EPA/State/Local/Tribal air management and staff, and fostering new partnerships and collaborations to achieve air quality benefits in communities affected by residential woodsmoke. EPA has supported demonstration woodstove changeout projects on the Nez Perce, Makah, and Swinomish Reservations.

**Projects to Support these Goals & Objectives:**

***A. Woodstove Best Management Practices Outreach –***

Because money for woodstove changeouts can be difficult to get, we also want to focus on educating homeowners on things they can do to make their woodstove burn cleaner.

*Tasks:*

1. Develop a fact sheet of best management practices by December 2009.
2. Distribute the fact sheet to Tribes and to homeowners.

*Lead:* Claudia Vaupel

*Outcome:* Homeowners use their woodstoves better, resulting in fewer emissions from woodstoves.

*Measure:* Number of outreach materials distributed.

***B. Air Quality Educational Package*** – We will develop an air quality educational package that can be used by Tribal Air Staff, EPA, or teachers in the classroom. The package will have different modules, covering topics such as open burning, the FARR, indoor air, woodstoves, and climate change. See page 25.

**Potential Future Projects:** EPA currently does not have the resources for these projects. We do not plan to work on these projects unless additional resources become available.

**A. *Interagency Partnerships*** – Region 10 would work with other Federal agencies (Bureau of Indian Affairs, Indian Health Services, US Department of Agriculture (RUS), and HUD) and Tribal health and housing programs to discuss potential partnerships and leveraging of federal funds for woodstove changeouts and indoor air. Energy efficiency may also be able to be included in this effort. This work would help establish relationships between Federal and Tribal environmental, health, and housing organizations. Region 10 would also include these other Federal agencies in future meetings with Tribal air managers.

*FTE Need:* 0.25 FTE

**B. *Regional Tribal Emissions Inventory for Indian Country in Idaho, Oregon, and Washington*** – Woodstove information would be included in the data collected under this potential future project. See page 18. Having this information will help us know where to target future outreach and funding.

**Goal: Protect air quality, human health, and the environment.**

**Objective: Improve indoor air quality.**

**Focus Areas:**



**Indoor Air**



**Communication**

**13. Indoor Air and Radon (current FTE = 0.15):**

Although the CAA focuses on ambient air quality, indoor air quality is a major area of concern for many Tribes. Evidence indicates that impacts from poor indoor air quality may exceed that of ambient air and the risks of Tribal communities may be greater than for the general population. EPA provides hotlines, publications, outreach, grant funding, and training to improve the quality of air within Tribal homes, schools, and offices. Indoor air projects can be funded under CAA §103(a)(5) and (b).

**Projects to Support these Goals & Objectives:**

**A. Air Quality Educational Package** – We will develop an air quality educational package that can be used by Tribal Air Staff, EPA, or teachers in the classroom. The package will have different modules, covering topics

such as open burning, the FARR, indoor air, woodstoves, and climate change. The indoor air module will focus on reducing asthma triggers, including tobacco smoke. These packages could also be used by Tribal / IHS clinics or housing / HUD programs. See page 25.

**Potential Future Projects:** EPA currently does not have the resources for these projects. We do not plan to work on these projects unless additional resources become available.

**A. Interagency Partnerships** – Region 10 would work with other Federal agencies to discuss potential partnerships and leveraging of federal funds for woodstove changeouts and indoor air. See page 52.





**B. Collaborative Tribal Initiative to Address IAQ Health Risk** - Region 10 would support and facilitate the development of a collaborative initiative among interested Tribes to more effectively and efficiently reduce health risks encountered by Tribal communities in their indoor environments. This initiative would also work to establish relationships between environmental, health, and housing organizations within each Tribe and among supporting federal agencies.

**FTE Need:** 0.20 FTE for one year

**Goal: Protect air quality, human health, and the environment.**

**Objective: Reduce air toxics emissions.**

**Focus Areas:**

-  **Air Toxics**
-  **PM/Burning**
-  **Communication**
-  **Information**

**14. Air Toxics (current FTE = 0.125<sup>+</sup>):** Toxic air pollutants, also known as hazardous air pollutants, are the 188 pollutants that are known or suspected to cause cancer or other serious health effects. Region 10 is working with Tribal, State and local governments to reduce air toxics releases to the environment.

EPA is responsible for implementing Federal standards in Indian country under the National Emission Standards for Hazardous Air Pollutants (NESHAP) program and the New Source Performance Standards (NSPS) program. These standards are developed for different categories of stationary sources, such as incinerators, that emit hazardous air pollutants, criteria pollutants, and non-criteria pollutants. EPA’s work to implement these programs includes performing applicability determinations and approving alternative test methods for sources in categories covered by these programs.

Mercury is an air toxic pollutant that is of particular concern to Tribes. In 2008, Region 10 developed a mercury strategy for reducing human exposure to mercury. The Region 10 Mercury Strategy identifies eight key activities for Regional focus, including: provide monitoring support, assess factors controlling mercury methylation, conduct mercury deposition

modeling, identify / inventory mercury sources, facilitate mercury collection and disposal programs, address unregulated atmospheric sources in Region 10, implement a Tribal outreach strategy regarding mercury contamination and health effects associated with mercury-contaminated fish consumption, and establish a technical exchange forum.

Tribes have also expressed concern about atmospheric deposition of air toxics and impacts to waterways, the food chain, and impacts to natural and cultural resources.

<sup>+</sup>This FTE is being supplemented with Bill Todd’s time in 2008.

**Projects to Support these Goals & Objectives:**

**A. Area Source Rule Implementation** - EPA is in the midst of promulgating rules to control toxic air pollutants from 70 area source categories. Region 10 is focusing its implementation efforts in Indian country on gas stations and autobody shops because we believe these two area source categories have the potential for some of the largest emissions reductions.

*Tasks:*

1. Hold a workshop for autobody shops September 10 and 11, 2008.  
✓*TASK COMPLETED*
2. Distribute outreach materials (best practices handouts, rule fact sheets and brochures) and compliance surveys to all known gas stations and autobody shops on reservations by May 2009.
3. Provide ongoing compliance assistance.

*Lead:* Heather Valdez

*Outcome:* Reduced emissions and reduced exposure from area sources.

*Measures:*

Number of sources to which we sent outreach materials and compliance surveys by May 2009.

Percentage of autobody shops in Indian country that are training certified by January 2011.

***B. Burn Units in Alaska*** – With few options for the management of solid waste, residents in rural Alaska often burn waste to reduce volumes. The burning of waste in low technology devices can lead to the emissions of air toxics and other air pollutants. In February 2008, EPA awarded a grant to research technologies that (a) reduce the volume of solid waste while minimizing air pollution, (b) are still affordable and easily operated, and (c) meet the needs of Tribes in Alaska. See page 49.

***C. Environmental Justice (EJ) Air Toxics Assessment Scoping*** – Scope a project to assess the air toxics risk for Indian country in Region 10 compared to the locations of EJ communities to help identify locations of interest for further investigation and efforts. Region 9 currently is working on a similar project.

*Tasks:*

1. Coordinate with Region 9 and the Region 10 Office of Environmental Assessment (OEA) to determine the work, information and resources needed to perform this assessment.
2. By December 2009, complete a scoping document that describes the work, information, and resources needed for this assessment and the benefits of pursuing this project. This document will be used to decide whether to staff this project and include it in the next version of the strategic plan.

*Lead:* Madonna Narvaez

*Outcome:* Decision to pursue project or not is made.

*Measure:* Scoping document is completed.

***D. Implementation of the Region 10 Mercury Strategy*** – The air program is responsible for the part of the EPA Region 10 Mercury Strategy to address unregulated atmospheric

sources in Region 10. EPA will work with states, Tribes and individual companies to develop voluntary agreements to reduce mercury emissions, participate in potential rulemaking, comment on state permits where appropriate, and will assist states and Tribes in evaluating mercury deposition from known atmospheric sources.

*Tasks:* By June 2009, develop an implementation plan for addressing unregulated atmospheric sources in Region 10.

*Lead:* Madonna Narvaez

*Outcome:* Unregulated atmospheric sources of mercury are better addressed.

*Measure:* Implementation plan is completed.

***Potential Future Projects:*** EPA currently does not have the resources for these projects. We do not plan to work on these projects unless additional resources become available.

***A. Regional Tribal Emissions Inventory for Indian Country in Idaho, Oregon, and Washington*** – Gas station and autobody shop information would be included in the data collected under this potential future project. See page 18.

**Goal: Protect air quality, human health, and the environment.**

**Objective: Reduce diesel emissions.**

**Focus Areas:**



**PM/Burning**



**Air Toxics**



**Communication**

**15. Diesel (current FTE = < 0.1):**

The West Coast Collaborative (Collaborative or WCC) is a partnership between leaders from different levels of government, the private sector, and environmental groups committed to reducing diesel emissions along the West Coast. To accomplish this goal, the Collaborative: 1) raises awareness of the need for diesel emissions reductions and the many highly successful State, Tribal, local, and regional efforts that promote and support voluntary projects; 2) creates a forum for information sharing among diesel emissions reductions advocates, and works to leverage significant new resources to expand voluntary diesel emissions mitigation efforts; and 3) implements projects that are regional in scope, leverage funds from a variety of sources, achieve measurable emissions reductions, and create momentum for future diesel emissions mitigation efforts.

**Projects to Support these Goals & Objectives:**

***A. Outreach and Education on the Health Impacts of***

***Diesel Emissions*** – As stated above, one of the goals of the Collaborative is to raise awareness of the need for diesel emissions reductions. EPA will develop a fact sheet or brochure for Tribal communities providing information on the health impacts of diesel emissions.

*Tasks:*

1. Use existing outreach materials to create a fact sheet/brochure appropriate for Tribes in Alaska and a fact sheet/brochure appropriate for Tribes in Idaho, Oregon, and Washington by June 2009.
2. Work with Tribal air team to identify opportunities to: distribute the fact sheet/brochure, to talk with Tribes about the health impacts of diesel emissions, to provide outreach on the Collaborative and how Tribes can be involved, and to discuss with Tribes what can be done to decrease diesel risks.

*Lead:* Fredianne Gray

*Outcome:* Reduced diesel emissions in Indian country and other Tribal communities.

*Measures:*

WCC has briefed Tribal air team on health effects of diesel emissions and has provided a brief overview of newly developed outreach material.

Number of fact sheets/brochures distributed.

Number of diesel grants awarded for projects that improve air quality in Indian country and other Tribal communities.

**Potential Future Projects:** EPA currently does not have the resources for these projects. We do not plan to work on these projects unless additional resources become available.

***A. Outreach to Tribes on Diesel Emissions*** – Develop a one-hour session / module for the 2009 Tribal Leaders Summit and/or other appropriate pre-existing gatherings of Tribal leaders and environmental managers giving an overview on topics such as: the health effects related to diesel emissions exposure, major diesel emissions sources in Indian country, the WCC, and funding sources available to Tribes to address diesel-related concerns.

*FTE Need = 20 hours*

**Goal: Protect air quality, human health, and the environment.**

**Objectives: Reduce greenhouse gas emissions and support adaptation efforts.**

**Focus Areas:**



**Communication**



**Information**

**16. Climate Change (current FTE = < 0.1):**

Tribes and Tribal communities in Region 10 are already experiencing impacts from climate change, especially in Alaska. Climate change impacts treaty-reserved rights and resources, Tribal and reservation communities, and traditional lifeways.

Region 10 developed a Climate Change Strategy to serve as a starting point for focusing key activities in our current work with Region 10 Tribes and identifying new activities that will help address expected impacts of climate change in our Region and to promote mitigation. The Region 10 Climate Change Strategy includes four broad objectives:

1. Region 10 will support activities to identify and quantify sources and sinks of greenhouse gas (GHG) emissions.
2. Region 10 will promote measures to help the Region and our partners adapt to climate change and to protect the resiliency of our ecosystems.
3. Region 10 will work with others to exchange information on climate change and its expected impacts in the region, and actions that individuals, businesses, our partners, and other organizations can do to reduce their GHG emissions.
4. Region 10 will examine the potential for integrating current climate change science, mitigation priorities, and adaptation goals into core EPA programs and funding mechanisms. EPA Region 10 will also reduce the GHG emissions from its daily operations and work-related travel. The EPA air program will be involved in the implementation of the strategy and will ensure the Tribal air programs are involved as appropriate.

The Climate Change component of the Air Tribal Strategic Plan was developed to be consistent with the objectives of the Region 10 Climate Change Strategy.

**Projects to Support these Goals & Objectives:**

**A. Climate Change in Grants** – Encourage energy efficiency and air quality-related climate change activities in 2009 Tribal air grant workplans.

*Tasks:*

1. Develop a list of potential projects related to climate change, energy efficiency, renewable energy, and sustainability to suggest to Tribes.
2. Include a climate change activity in at least one Tribal air grant in 2009 and increase this number in coming years.

*Lead:* Justin Spenillo

Outcomes: Increase in climate change work being done through CAA grants.

*Measure:*

Number of CAA grants awarded with a climate change component. (outcome-based)

***B. Climate Change Meeting*** – EPA will organize a meeting in 2009 to present technical information on climate change impacts on air quality for staff from States and Tribes. We will also coordinate with other offices to present information on climate change impacts on air quality at other climate change conferences and trainings for Tribes.

*Leads:* Gina Bonifacino and Madonna Narvaez

*Outcome:* Tribes have a better understanding of how climate change may affect air quality.

*Measure:* Number of Tribal staff that attend the climate change meeting.

***C. Air Quality Educational Package*** – We will develop an air quality educational package that can be used by Tribal Air Staff, EPA, or teachers in the classroom. The package will have different modules, covering topics such as open burning, the FARR, indoor air, woodstoves, and climate change. See page 25.

***D. Greenhouse Gas Reporting Rule Outreach*** - The Greenhouse Gas Reporting Rule (expected to be proposed in March/April 2009 and finalized in October/November 2009) will require mandatory reporting of greenhouse gas emissions above appropriate thresholds in all sectors of the economy. EPA will provide outreach to Tribes and to affected facilities on the proposed and final rules.

*Tasks:* Within 1 month of final promulgation of the GHG reporting rule, Region 10 will send information on the rule to all known potentially affected sources and Tribes.

*Lead:* Madonna Narvaez

*Outcome:* Compliance with GHG reporting requirements for sources in Indian country.

*Measure:* Rule information is distributed.

**Potential Future Projects:** EPA currently does not have the resources for these projects. We do not plan to work on these projects unless additional resources become available.

**A. *Western Climate Initiative (WCI)*** - In 2007, the Governors of Washington, Oregon, Arizona, New Mexico, and California signed an agreement establishing the WCI. The purpose of this State-initiated effort is to collaborate in identifying, evaluating and implementing ways to reduce GHG emissions and to achieve related co-benefits. Since then, other governments have joined the WCI as full partners or as observers. The WCI Partners are working to create a cap and trade program for the western region. While EPA is not a member of WCI, EPA will ensure Tribes are informed of the significant regional efforts of the WCI and of the opportunity to engage in these discussions.

*Tasks:*

1. Set up a conversation between EPA and Janice Adair from Ecology (Chair of the WCI) to discuss Tribes' involvement in the WCI.
2. Invite Janice to be on a conference call with Region 10 Tribes and/or the RTOC to describe the WCI's efforts and how Tribes can be involved.
3. Have a follow-up discussion with Tribes on whether and how they want to participate and how EPA can support that participation.

*FTE Need = 20 hours*

**B. *GHG Emissions Inventory*** – Begin working on a Regional GHG Emissions Inventory for Indian Reservations in Idaho, Oregon and Washington. When collecting information for the Regional Emissions Inventory, EPA would also estimate the GHG emissions from these sources. Once EPA receives GHG emissions info under the GHG Reporting Rule, we would make sure these emissions are included. Additionally, EPA will provide technical support to Tribes interested in developing a GHG emissions inventory. See page 18.

Appendix 1

### Region 10 Organizational Chart



## Appendix 2: Summary Table of Projects

<b>Tribal Program Support and Tribal Capacity Building and Maintenance</b>	<b>Project Lead(s)</b>
Effective Communication	Mary Manous Debra Suzuki
Visits with Tribes	Mary Manous
Orientation Training for New Air Quality Staff Working for Tribes	Mary Manous Justin Spenillo
Partnership Pilot Program	Gary Olson
Guidance on Regulatory Options for Tribes	Rich McAllister Debra Suzuki
FARR Delegation Discussion at a Meeting with Tribes	Steve Body
Research Delegation of FARR Enforcement Authority	Debra Suzuki
TAS	Justin Spenillo
<b>Grants Management</b>	
Effective Grant Management by EPA and Tribes	Mary Manous
Standardized Grant Outputs, Performance Measures, and Reporting Requirements	Mary Manous Justin Spenillo
<b>Emissions Inventories</b>	
FARR Registration Follow-up and Analysis	Bill Todd
<b>Monitoring</b>	
Finalize Regional Guidelines for Support of PM2.5 Monitoring on Reservations	Keith Rose
Develop Guidelines for Support of Monitoring by Tribes in Alaska	Keith Rose
Monitoring Data Used for Regulatory Purposes	Keith Rose
Air Quality System (AQS) Quarterly Completeness Reports	Jan Noel
Annual Air Quality Data Assessment for Reservations	Keith Rose
Website Links to Tribal Monitoring Data	Keith Rose
Speciation Study of Air Pollution on Makah Reservation	Keith Rose
<b>Outreach</b>	
Air Quality Educational Package	Gary Olson
Air Quality Calendar	Angel McCormack
FARR Hotline Magnet	Gary Olson
Compliance Assistance Outreach for Mint Growers	Anne Dalrymple Gary Olson Jerry Craig
Compliance Assistance Outreach for Orchard Growers	Jerry Craig
Outreach for Orchardists Using Smudge Pots	Gary Olson Jerry Craig
Outreach and Education for Fire and Police Departments on the FARR	Gary Olson
Update EPA Tribal Air Quality Website	Anne Dalrymple
<b>Air Quality Planning</b>	
Communication on SIP Revisions	Debra Suzuki
Communication on Designations	Krishna Viswanathan
Fort Hall PM10 Nonattainment Area	Donna Deneen
Swinomish TIP	Debra Suzuki

Guidance on Regulatory Options for Tribes	Rich McAllister Debra Suzuki
Wapato Hills Puyallup River Valley PM2.5 Nonattainment Area	Gina Bonifacino
<b>Permits</b>	
Title V Permits	Doug Hardesty Dan Meyer
Non-Title V Permits	Doug Hardesty Heather Valdez Dan Meyer
PSD Permits	Pat Nair
Tribal NSR Rule	Doug Hardesty
<b>Compliance &amp; Enforcement</b>	
FARR Compliance Assistance and Complaint Response Workshop	Angel McCormack
Inspector Credentials Q&As	Don Dossett
Title V Inspections in Indian Country	Bill Todd Gary Olson Rindy Ramos
Compliance Assistance Outreach for Mint Growers	Gary Olson Jerry Craig
Compliance Assistance Outreach for Orchard Growers	Jerry Craig
Outreach and Education for Fire and Police Departments on the FARR	Gary Olson
Research Delegation of FARR Enforcement Authority	Debra Suzuki
Complaint Response	Gary Olson
Develop Example Fugitive Particulate Matter Surveys and Plans	Bill Todd
<b>FARR</b>	
FARR Rulemakings	Debra Suzuki
FARR Permit Fees	Rich McAllister
Trust Lands Outside Reservations	Rich McAllister
FARR Registration Analysis	Bill Todd
Air Quality Educational Package	Gary Olson
FARR Delegation Discussion at a Meeting with Tribes	Steve Body
FARR Hotline Magnet	Gary Olson
Compliance Assistance Outreach for Mint Growers	Gary Olson Jerry Craig
Compliance Assistance Outreach for Orchard Growers	Jerry Craig
Non-Title V Permits	Doug Hardesty Heather Valdez Dan Meyer
FARR Compliance Assistance and Complaint Response Workshop	Angel McCormack
Outreach and Education for Fire and Police Departments on the FARR	Gary Olson
Outreach and Education on Delegation Authority and Update of Prescriptions for Forestry, Agricultural and Open Burning on the Umatilla Reservation	Angel McCormack
Research Delegation of FARR Enforcement Authority	Debra Suzuki
Complaint Response	Gary Olson
FARR Database Development	Jim Hazel
FARR Burn Bans	Gary Olson
Scoping Project for Evaluations of FARR Delegations	Steve Body

Develop Example Fugitive Particulate Matter Surveys and Plans	Bill Todd
<b>Tribes in Alaska</b>	
Alaska Rural Road Dust Project	Mary Manous
Alaska Tribal Multimedia Air Outreach Project	Mary Manous
Burn Units in Alaska	Heather Valdez
Develop Guidelines for Support of Monitoring by Tribes in Alaska	Keith Rose
<b>Smoke Management</b>	
Annual Smoke Management Program Evaluations	Mike McGown Angel McCormack
Plan for the Development of a Smoke Management Program on the Yakama Reservation	Angel McCormack
Regional Smoke Management Coordination	Steve Body
Revise the Smoke Management Memorandum of Agreement (MOA) between the Nez Perce Tribe, EPA, and the State of Idaho	Mike McGown
<b>Woodstoves and Residential Woodsmoke</b>	
Woodstove Best Management Practices Outreach	Claudia Vaupel
Air Quality Educational Package	Gary Olson
<b>Indoor Air</b>	
Air Quality Educational Package	Gary Olson
<b>Air Toxics</b>	
Area Source Rule Implementation	Heather Valdez
Burn Units in Alaska	Heather Valdez
Environmental Justice (EJ) Air Toxics Assessment Scoping	Madonna Narvaez
Implementation of the Region 10 Mercury Strategy	Madonna Narvaez
<b>Diesel</b>	
Outreach and Education on the Health Impacts of Diesel Emissions	Fredianne Gray
<b>Climate Change</b>	
Climate Change in Grants	Justin Spenillo
Climate Change Meeting	Gina Bonifacino Madonna Narvaez
Air Quality Educational Package	Gary Olson
Greenhouse Gas Reporting Rule Outreach	Madonna Narvaez

### Appendix 3: EPA Region 10 Staff Contact List

Staff Member	Phone Number	Area of Focus
<b>Office of Air, Waste and Toxics</b>		
Angel McCormack	206-553-1498	Project Officer for tribal air grants for the Confederated Tribes of the Umatilla Indian Reservation and Yakama Nation. Provides technical assistance to tribes for smoke management. Advises EPA staff on consultation issues.
Anne Dalrymple	--	Provides support for tribal outreach projects and FARR projects.
Ashley Zanolli	206-553-4425	Provides support on air toxics and environmental justice issues.
Bill Todd	206-553-6914	Lead for FARR Registration and Regional Tribal Emissions Inventory. Inspector for Title V sources in Indian country.
Claudia Vaupel	206-553-6121	Provides support on woodstove issues.
Dan Meyer	206-553-4150	Writes Title V and non-Title V permits in Indian country.
Dave Bray	206-553-4253	Provides policy advice and provides institutional knowledge.
Davis Zhen and Susan Titus	206-553-7660 206-553-1189	Provide support on indoor air issues.
Debra Suzuki	206-553-0985	Tribal Air Team Coordinator and FARR Team Lead. Lead for revising the FARR. Provides technical assistance for TIP development. Coordinates monthly call with ID, OR, and WA tribes.
Donna Deneen	206-553-6706	Lead for planning work for the Fort Hall PM10 Nonattainment Area.
Doug Hardesty	208-378-5759	Lead for Title V and non-Title V permits in Indian country.
Fredianne Gray	206-553-6387	Provides support on diesel issues.
Gary Olson	206-553-0977	Lead for FARR Outreach, FARR Burn Bans, and FARR Complaint Response. Inspector for Title V sources in Indian country.
Gina Bonifacino	206-553-2970	Lead for planning work for the Wapato Hills Puyallup River Valley PM2.5 Nonattainment Area. Provides support on climate change issues.
Heather Valdez	206-553-6220	Provides support on air toxics issues, particularly the area source rules and incinerator rules. Writes non-Title V permits.
Jerry Craig	509-952-3057	Place-based on the Yakama Reservation to help in implementing the FARR there and to provide assistance to the Yakama Nation.
Jim Hazel	206-553-6707	Provides technical support for the development and maintenance of the FARR database.

<b>Staff Member</b>	<b>Phone Number</b>	<b>Area of Focus</b>
Justin Spenillo	206-553-6125	Project Officer for tribal air grants in Oregon and Washington. Lead for TAS processing (Treatment in the same manner as a state). Provides sustainability expertise.
Keith Rose	206-553-1949	Provides programmatic support for monitoring.
Krishna Viswanathan	206-553-2684	Lead for PM2.5 and ozone designations.
Madonna Narvaez	206-553-2117	Provides support on air toxics and climate change issues.
Mary Manous	206-553-1059	Tribal Air Grants and Policy Lead / Funds Manager. Project Officer for tribal air grants in Alaska and other grants. Point of contact for Alaska tribal air issues and monthly call with AK tribes. Tribal Specialist for Air (represents the air program on this Region 10 workgroup). Tribal Air Coordinator for Region 10 (represents Region 10 on this national workgroup).
Mike McGown	208-378-5764	Project Officer for tribal air grants in Idaho. Provides support for smoke management programs in Idaho.
Steve Body	206-553-0782	Lead for FARR delegation processing. Provides support on smoke management policy issues.
<b>Office of Compliance and Enforcement</b>		
Don Dossett	206-553-1783	Lead for FARR enforcement. Lead for Tribal Inspector Credentials.
Rindy Ramos	206-553-6510	Lead for Title V enforcement in Indian country.
<b>Office of Environmental Assessment</b>		
Chris Hall and Rob Elleman	206-553-0521 206-553-1531	Provide technical support for monitoring, modeling, and calling burn bans.
Jan Noel	206-553-1691	Provides technical support for AQS data.
<b>Office of Regional Counsel</b>		
Julie Matthews	206-553-1169	Provides legal support for FARR smoke management work.
Julie Vergeront and Shirin Venus	206-553-1493 206-553-4194	Provide legal support for FARR implementation and enforcement.
Keith Cohon	206-553-2149	Provides legal support on tribal law issues.

## Appendix 4: Clean Air Act Work by R10 Tribes

### I. Tribal and/or Reservation Characteristics:

#### Number of Tribes and Reservations per State

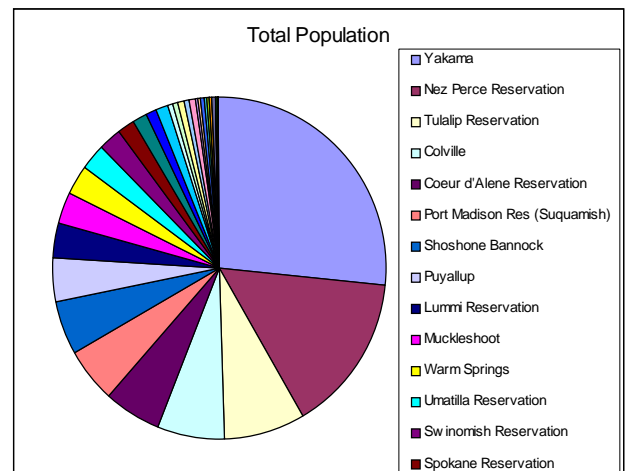
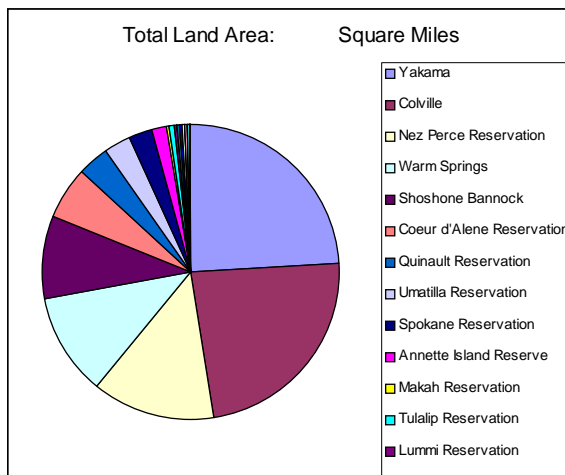
	With Reservation	Without Reservation	Total
<b>Alaska</b>	<b>1</b>	<b>228</b>	<b>229</b>
<b>Idaho</b>	<b>4</b>	<b>0</b>	<b>4</b>
<b>Oregon</b>	<b>9</b>	<b>0</b>	<b>9</b>
<b>Washington</b>	<b>28</b>	<b>1</b>	<b>29</b>
<b>Lower 3 States</b>	<b>41</b>	<b>1</b>	<b>42</b>
<b>Total Region 10</b>	<b>42</b>	<b>229</b>	<b>271</b>

- There is one federally-recognized tribe in the lower three states (Cowlitz) that does not have a reservation established yet.
- The Federal Air Rules applies to the 39 reservations that existed at the time of its promulgation. Two additional reservations (Snoqualmie and Samish) have since been recognized.
- In contrast under the Alaska Native Claims Settlement Act, only one Alaska Native Village out of 229 has a reservation.

#### Population and Land Area of Reservations

	Land Area: Sq Miles	Population
<b>AK</b>	130	1,447
<b>ID</b>	2,534	30,347
<b>OR</b>	1,344	7,089
<b>WA</b>	5,041	80,486

*Seventeen of the forty-two Region 10 reservations have populations over 750 people or trust lands greater than ten square miles in area.*



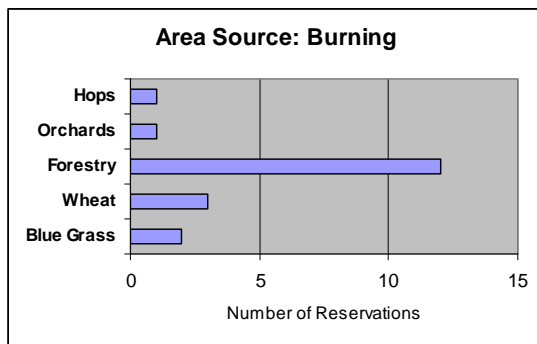
## II. Known Sources of Air Pollution

### A. Major and Minor Point Sources on Reservations:

Tribe / Reservation	Number of Minor Sources	Title V & Syn Minors
Warm Springs	3	1
Coeur d'Alene	6	2
Colville	5	2
Nez Perce	29	3
Shoshone Bannock / Ft Hall	9	1
Yakama	21	8
Metlakatla/ Annette Is Res	Undetermined	1
All Other Reservations	63	0

*The six FARR reservations with major or Title V sources account for at least as many minor sources as all of the remaining 33 FARR reservations.*

### B. Reservations with Agricultural Burning:



*Reservations most impacted by burning are the Yakama, Nez Perce, Coeur d'Alene, and Umatilla. Makah, Quinault, Colville, and Spokane also have some burning, primarily associated with forestry.*

*Forestry slash burning occurs to varying degrees on about twelve reservations, with some increase observed toward chipping the slash and debris.*

**C. Residential Heating: Woodstoves are a common source of fuel for residential heating** in tribal communities both in the lower three states, as well as in Alaskan Native Villages, where there are nearby forests from which to get inexpensive or free wood. The woodstoves are generally found to be old, pre-EPA certification, or homemade devices with a high propensity to generate ambient PM2.5 pollution, as well as contribute to indoor air pollution levels of carbon dioxide and carbon monoxide. The exact percentage of homes using wood stoves as their primary source of heat on reservations and in tribal communities is not known - nor how many are uncertified woodstoves.

**D. Alaskan Native Villages: Unique Issues** Generally the 229 ANVs have not yet built the capacity equivalent to that of the tribes in the lower 48 states. Their air and other environmental concerns and options for addressing them, particularly solid waste and water, present unique challenges related to the climate, lack of access, jurisdictional issues, and large number of ANVs (229) that there are. The major air related concerns are:

- Road dust and other fugitive dust
- Solid waste burning, including burn barrels,
- Diesel fuel use
- Indoor air pollution, and
- Residential wood heating.

**III. Tribal Air Grants:** OAR State and Tribal Assistance Grants (STAG) funding supports most of the air related work being done by tribes in Region 10. In addition, IGAP (Indian General Assistance Program) funding has funded some initial assessment, baseline monitoring, and source inventory work by a limited number of tribes in the Lower 3 States as well as Alaska. The following are some approximate figures that provide a picture of the amount and use of these funds.

- \$17 million has been provided in grant funding to tribes or tribal consortia between 1996 and 2007.
- 24 tribes or tribal consortia have received grants since 1996 and 18 tribes or consortia currently have CAA grants.
- \$2 million provided in grants to five non-tribal entities such as universities and nonprofits to support tribal air capacity building through training, outreach, and other support; either with regard to indoor air quality or capacity building for tribes in Alaska.
- Out of 29 separate grant recipients since 1996:
  - Alaska 8 [6 tribes, 2 nonprofits]
  - Idaho 4
  - Oregon 3
  - Washington 14 [13 tribes, 1 university]
  - Other 1 [university]
- Out of the ten (10) tribal grants that were discontinued: 6 were due to poor performance, with four satisfactorily finishing their projects. Of the 6 that were discontinued grants have been reestablished with two [Chehalis & Yakama].
- 3 to 5 Air SEE positions have been funded since 2001, with CAA STAG and/or OCE EPM funds to assist with Direct Implementation, including the FARR, activities on Region 10 reservations. Their work has included:
  - Database development for all sources subject to FARR registration rule.
  - Complaint response and FARR hotline.
  - Source registration and outreach
  - FARR implementation and monitoring on the Yakama Reservation
  - Support for tribal air monitoring data upload into the EPA Air Quality System database.
- Contract support for monitor operation has also been funded with STAG funds to the national IAQ for IMPROVE monitors (\$35,000 per year for Spokane and Makah) and to Wash Dept of Ecology for continuous monitors on reservations in Washington State.

#### **IV. Primary Tribal Work Activities**

##### **A. Monitoring:**

- **PM filter-based** monitoring has historically been the primary and initial activity of most tribal grantees. Only one tribe currently uses filter-based monitors (Shoshone Bannock). Two Alaska Native Villages in the NW Arctic Region have monitored with FRMs for PM10 and recorded levels from road dust that exceed the NAAQS standard.
- **Continuous PM real time monitoring** is now the primary assessment activity on reservations with some support from the neighboring state or local air agency for audits, data upload, and equipment maintenance. This monitoring supports:
  - FARR burn ban calls
  - AQI information for community use in health protection and pollution awareness.
  - Alert to potential need for FRM monitoring if levels begin to exceed 85% of the NAAQS. Two reservations in Washington (Yakama and Puyallup) have the potential to be found in nonattainment under the new PM 2.5 standard.
- **Ozone, Sox & NOx:** Two tribes are monitoring for one or more of the following NAAQS pollutants: ozone, NOx and Sox. No indication that there are NAAQS violations that would impact nonattainment designations at this time.

**B. Assessments and Emissions Inventories**

- Four to eight reservations have had some type of emissions inventory, if only for Title V, completed and submitted to the NEI. The TEISS software enables tribes to apply emissions factors to most point, area, and mobile sources of air pollution impacting their reservations, however, tribes have not yet developed the capability to analyze such data or that from source inventories to be able to prioritize the air pollution sources that should be targeted for management, as yet.
- More limited airshed assessments have been completed by about 10 tribes.

**C. Smoke management:** Three tribes are funded to run agricultural and open burn permit programs as well as forestry smoke management (Nez Perce, Coeur d’Alene, and Umatilla). Others do more limited fire safety permitting for open burning, including Swinomish, Quinault, Puyallup, Tulalip, and others.

**D. FARR Implementation:** All 39 tribes work cooperatively with EPA to implement the FARR, however each tribe has a different level of involvement based on their interest, need, and resources. The primary FARR implementation activities include: taking, responding to, and investigating air quality complaints; participating in burn ban calls to determine whether current conditions warrant a ban on outdoor burning; and providing outreach and compliance assistance to the public and regulated community, particularly for the open burning and registration rules. Four tribes (Nez Perce, Coeur d’Alene, Umatilla, and Quinault) have delegation to administer portions of the FARR on EPA’s behalf, however EPA retains enforcement authority. The Nez Perce and Umatilla Tribes operate burn permitting and smoke management programs for agricultural, forestry and open burning on their Reservations under their FARR delegation agreements.

**E. Eligibility Determinations (TAS):**

As of 1/1/09	CAA Sections			
	105	106	505(a)(2)	106(c-e)
Tribes	Grant	Interstate Air Agency	Affected State for Title V	Designation Authority
Shoshone-Bannock	6/23/2000	6/23/2000	6/23/2000	6/23/2000
Tulalip	1/29/2004			
Colville	2/10/2004			
Puyallup	5/11/2004		5/11/2004	
Swinomish	6/11/2004			
Quinault	1/6/2005			
Makah	4/9/2006			
Umatilla	2/2/2007		2/2/2007	
Coeur d’Alene	2/27/2007			

**F. Indoor Air Quality & Woodstove Change outs:**

- Many tribes have done some type of outreach and education work in regard to indoor air quality, with the assistance of WSU and ITEP, among others, that have been funded to provide training and assistance on residential “walk-throughs.”
- Four tribes have been involved in woodstove change outs on their reservations as part of different studies or funded with tribal money.