EXCEPTIONAL EVENTS DUST MITIGATION PLAN

9/28/2018

Department of Environmental Quality

Mission Statement:

The Department of Environmental Quality honors the Community's cultural heritage by protecting, conserving, and restoring the Community's environmental resources.

Vision Statement:

A healthy, sustainable environment for our future generations.

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Exceptional Events Dust Mitigation Plan

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1 BACKGROUND

1.1 Purpose

Revisions to the 2007 Exceptional Events Rule (Code of Federal Regulations, Title 40, Subparts 50.1, 50.14, and 51.930) were finalized by the Environmental Protection Agency (EPA) in September of 2016. The revised 2016 Exception Events Rule (EER) provides the regulation standards for areas claiming exceptional events (e.g., natural high wind events) for their exceedances of the National Ambient Air Quality Standards (NAAQS) set forth by the Clean Air Act. In Arizona, exceptional events often include smoke from wildfires and dust storms caused by strong winds.

The 2016 EER also requires areas with "historically documented" or "known seasonal" exceptional events to develop a mitigation plan. The Gila River Indian Community (GRIC or Community) continues to receive numerous high wind events on an annual basis that cause exceedances of the PM10 health standard since implementation of the air monitoring program. GRIC continues to report these events as exception events and requesting concurrence for exclusion of the air quality data from regulatory decisions. Consequently, the Community was specifically indentified in the 2016 EER (Table 6, Federal Register 68216) as one of the areas with "historically documented" or "known seasonal" exceptional events that must develop a dust mitigation plan. Therefore, the Air Quality Program (AQP) for the Community's Department of Environmental Quality (DEQ) has developed this Dust Mitigation Plan (DMP or Plan) to address the exceedances of the NAAQS for particulate matter less than or equal to 10 microns (PM_{10}) caused by high wind events.

The DMP is aimed to address several issues with exceptional events, with a focus on providing public notification and outreach. The Plan must contain mitigation measures for reducing source generation, while also steps for minimizing public exposure to high concentrations of PM_{10}. The DMP must contain all of the components identified in 40 CFR 51.930(b)(2) as shown in Table 1 below.

Table 1. Mitigation Plan Components [40 CFR 51.930(b)(2)]

Citation	Requirement	Description	Plan Section
(i)	Public Notification & Education Programs	Public notification to and education programs for affected or potentially affected communities. Such notification and education programs shall apply whenever air quality concentrations exceed or are expected to exceed a NAAQS with an averaging time that is less than or equal to 24-hours.	2
(ii)	Identification & Implementation of Mitigation Measures	Steps to identify, study and implement mitigating measures, including approaches to address each of the following:	3
(ii)(A)	Abate/Minimize Contributing Controllable Sources	Measures to abate or minimize contributing controllable sources of identified pollutants.	3.1 3.2
(ii)(B)	Minimize Public Exposure to High Concentrations	Methods to minimize public exposure to high concentrations of identified pollutants.	3.3
(ii)(C)	Collection and Maintenance of Data	Processes to collect and maintain data pertinent to the event.	3.4
(ii)(D)	Consultation	Mechanisms to consult with other air quality managers in the affected area regarding the appropriate responses to abate and minimize impacts.	3.5
(iii)	Periodic Review and Evaluation of Mitigation Plan	Provisions for periodic review and evaluation of the mitigation plan and its implementation and effectiveness by the State & interested stakeholders.	4

Table 1. Mitigation Plan Components [40 CFR 51.930(b)(2)]

Citation	Requirement	Description	Plan Section
(iii)(A)	Public Process Requirements for Plan	With the submission of the initial mitigation plan according to the requirements in 51.930(b)(3) that contains the elements in 51.930(b)(2), the State must:	4.1
(iii)(A)(1)	Public Comment	Document that a draft version of the mitigation plan was available for public comment for a minimum of 30 days;	4.1
(iii)(A)(2)	Submit Public Comment with Plan	Submit the public comments received along with its mitigation plan to the Administrator	4.1 App. C
(iii)(A)(3)	Explanation of Revisions due to Public Comments	In its submission to the Administrator, for each public comment received, explain the changes made to the mitigation plan or explain why the State did not make any changes to the mitigation plan.	4.1 App. C
(iii)(B)	Periodic Review and Evaluation	The State shall specify in its mitigation plan the periodic review and evaluation process that it intends to follow for reviews following the initial review identified in 51.930(b)(2)(iii)(A).	4.2

1.2 Gila River Indian Community

The Gila River Indian Community, a federally-recognized tribe in Region 9, is a rural community located on 374,000 acres in south-central Arizona. The Community has a membership (on and off the reservation) of approximately 21,500 people with an on-reservation population of approximately 13,000 people. The Gila River Indian Reservation's main boundaries are located south of and adjacent to the Phoenix Metropolitan Area (PMA). The Community has also has placed new land into trust, internally identified as "Parcels M and N", which are separate from the main reservation and are located within the PMA. The continued growth of the PMA brings with air quality issues associated with increased vehicle traffic and economic development (stationary sources) to the Community.

The Community has one operating industrial park (Lone Butte Development) that contains approximately 40 commercial and industrial facilities and two sand and gravel plants that contain approximately 10 aggregate-related facilities. There are also several commercial and industrial facilities scattered throughout the Community outside of the industrial parks. Lone Butte Development, a tribally-chartered corporation, lies within the Maricopa County PM_{10} Non-Attainment Area and contains one major (Title V) air pollution source, a secondary aluminum processing plant (Pimalco). Most of the other commercial and industrial facilities within the Community are minor (Non-Title V) sources, and the GRIC Air Quality Program (AQP) is currently in the process of permitting these facilities.

There are approximately 35,000 agricultural acres under production within the Community. Approximately 6,700 agricultural acres are located within the Maricopa County PM_{10} Non-Attainment Area. Of the 6,700 acres, approximately two-thirds are planted in alfalfa, which is very rarely cultivated and considered a good cover crop, thus limiting dust emissions from cultivation and high wind episodes.

The Community has developed the Air Quality Program for almost 20 years. In that time, the Community has implemented an ambient air monitoring network, developed and EPA-approved Tribal Implementation Plan, and has begun regulating commercial, industrial, and other air pollution sources on the Community in order to improve the air quality for its members. To date, the Community has managed to achieve its own NAAQS designations, separate from the state, for ozone, carbon monoxide, nitrogen oxides, and sulfur dioxides. The Community's inclusion in the Phoenix PM_{10} Nonattainment Area continues to be an issue. Natural events, such as

windstorms and dust storms, are common in the Community as well as in the PMA. These storms can cause exceedances for PM_{10} and are often flagged by the Gila River Indian Community's Air Quality Program as exceptional events.

1.3 Air Quality Monitoring Network

Ambient air quality monitoring is carried out by the GRIC Department of Environmental Quality's Air Quality Program (AQP). The GRIC ambient air monitoring network monitors PM_{10} and ozone for regulatory purposes using the protocols established under the State and Local Air Monitoring Stations (SLAMS) network that is described in the 40 CFR 58.10. EPA works closely with GRIC to adhere to these requirements with appropriate flexibility as stated in the Tribal Authority Rule (TAR) (63 FR 7254). The GRIC monitoring network also complies with Ambient Air Quality Surveillance (40 CFR Part 58) requirements. Monitoring data collected in accordance with the approved Quality Assurance Project Plan (QAPP) is compared to the NAAQS and used as a basis for submitting designation recommendations for lands under GRIC's jurisdiction and to provide air quality information to Tribal leadership and Community members.

Three Federal Equivalent Method (FEM) PM_{10} monitors and two FEM ozone analyzers are installed at three locations in the Community – St. Johns, Casa Blanca, and Sacaton (see Figure 1). The St. Johns and Sacaton sites monitor both ozone and PM_{10} and the Casa Blanca site monitors PM_{10} only. All three locations have a full meteorological sensor set.

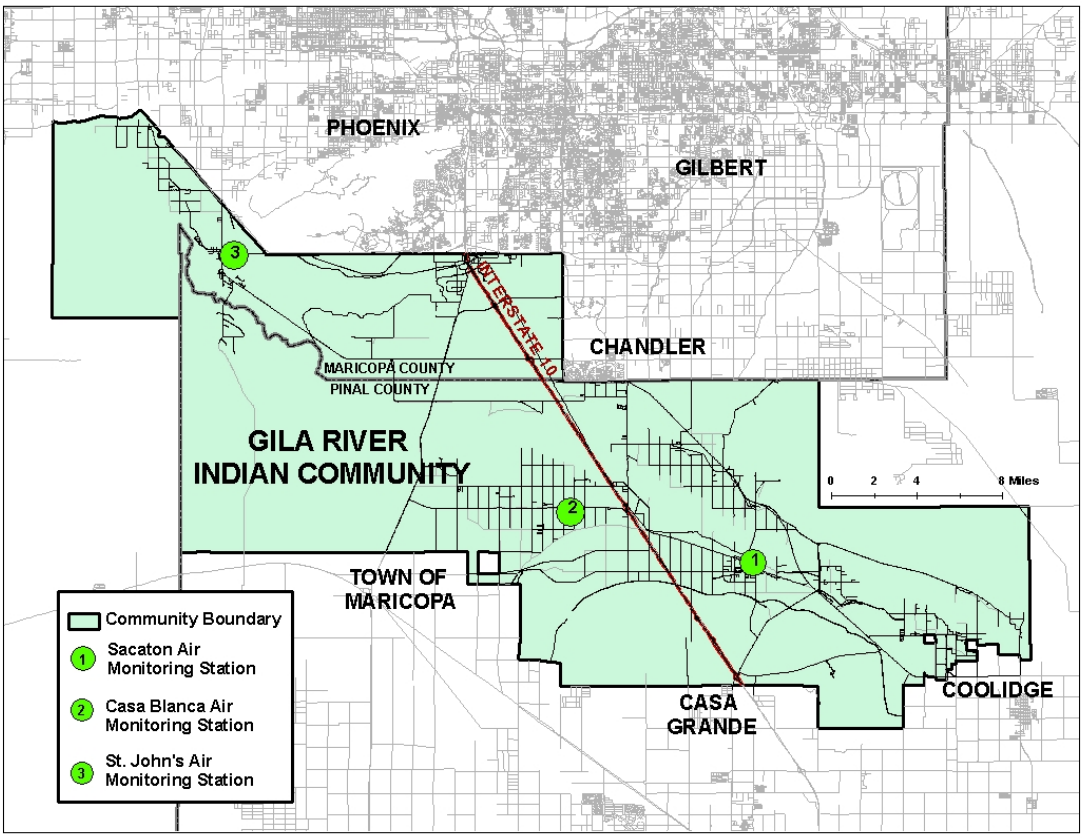


Figure 1. A map of the Community and the locations of its three ambient air monitoring stations.

2 PUBLIC NOTIFICATION AND EDUCATION

2.1 Prompt/Immediate Notification

Air Quality Alerts for high winds and blowing dust are currently sent out by the AQP through Community news outlets (GRIC DEQ website, GRIC Government Intranet, mygilariver.com, etc) when air quality conditions are expected to become dangerous due to exceptional events (see Appendix A). These alerts are being improved for clarity, but include at a minimum the warning, the date, and tips for reducing dust generation and exposure. The AQP is currently assessing a more formal process to send out the alerts based on specific concentration triggers and/or forecasts from the adjacent air quality jurisdictions (Maricopa and Pinal Counties and the State of Arizona). The AQP is also in the development process for a webpage to display more current monitoring information including met data (wind speed and direction, rainfall, etc.), hourly and average daily PM10 concentrations, and visibility images.

Weekly Weather outlooks are also provided to the Community by the Office of Emergency Management (OEM) on the Community's private intranet network and often include information about high wind, dust, and air quality conditions and threats. The AQP plans to work more closely with OEM to coordinate the release of more timely alerts.

Depending on the availability cellular service signals on the Community, some Community members receive Wireless Emergency Alerts from the National Weather Service when there is severe weather near the area, including dust storms. This allows the Community to be up-to-date on potential immediate dust threats and receive prompt warnings about dust events.

The Air Quality Flag Program (AQFP) is currently being implemented at 9 different locations spread out across the Community, including five different schools. At each location a colored flag, corresponding with the expected air quality index of that day, is displayed at the participating location. The expected air quality index is based on the forecasts for either Pinal or Maricopa Counties. This system helps to increase the awareness of PM_{10} and related dust hazards for Community residents, students, and employees on a daily basis. Air Quality flags are located at GRIC DEQ headquarters, the Governance Center, Ira H. Hayes Memorial Library, Blackwater Community School, Casa Blanca Community School, Gila Crossing Community School, Sacaton Middle School, Maricopa Village Christian School, and the District 7 Service Center.

The Air Quality Program is evaluating other forms of prompt alerts about immediate dust threats and processes to streamline alerts, such as partnerships with Community media channels.

2.2 Long-Term Outreach

The AQP keeps an up-to-date webpage about its monitoring, permitting, and outreach. On the website, there is information about the Clean Air Act, the Community's Air Quality Management Plan, permitting, ambient air monitoring, and resources for the Community. Current air quality conditions based on data from the GRIC monitors are also displayed in the AirNow app and in AirNow widgets on the AQP webpage. Weather forecast information, including both wind and dust hazard information, is also available at mygilariver.com, so Community members can easily access this information and forecasting.

The Air Quality Program also hosts an annual open house for the GRIC annual Air Monitoring Network Review document. During this open house, DEQ Air Quality employees discuss monitoring results over the course of the

year and what that means for the Community in regards to air quality and health. Public comments and questions are recorded throughout the open house.

The Air Quality Program is also planning to partner with the Education & Outreach Office to produce a public-service announcement (PSA) about air quality monitoring, exposure, and preventative actions. This PSA will be run on Gila River television channels and also accessible on the AQP webpage.

DEQ is also developing outreach materials for the Community, such as a brochure on the hazards of windblown dust. The AQP is evaluating further outreach strategies and initiatives to reduce overall exposure to extreme dust exceptional events.

2.3 Stakeholder-Specific Notification

The Air Quality Program is working with the agricultural sector on the Community to understand what best-management practices (BMPs) are being employed and utilized to help reduce the severity of extreme dust events on high-wind days. There are many stakeholders within the Community that affect and are affected by dust generation and windblown dust events. For this reason, the Air Quality Program is working to establish stakeholder-specific outreach strategies, to ensure effective communication to all Community members.

3 MITIGATION

The Air Quality Program works to identify and study sources on the Community through monitoring, permitting, compliance and enforcement, and outreach. Currently, GRIC uses regulatory actions to help mitigate contributions to windblown dust hazards from facilities by requiring earth-moving permits for any dust-generating projects and activities greater than one acre. The AQP is in the process of assessing formal voluntary programs to reduce dust generation from other unregulated sources such as farming and unpaved roads.

3.1 Regulation of Particulate Matter

The Gila River Indian Community has its own legislation for air pollution control in Title 17, Chapter 9 of the GRIC Code – also known as the Air Quality Management Plan (AQMP). Through the AQMP, which also includes the Tribal Implementation Plan (TIP) for the EPA, the Community regulates sources of PM_{10} (as fugitive dust, visible emissions, and point source) from commercial, industrial, and construction activities on Community land through permitting and compliance and enforcement. There are four distinct sections in the AQPM that regulate sources of PM as summarized in Table 2 below.

Table 2. Sections in the GRIC AQMP Regulating Particulate Matter Sources

Citation	Title	Description
Part V, Section 1.0	Open Burning	Requires permits for conducting open burns and lists exemptions for types of burning that does not require a permit. Sets restrictions on what can and cannot be burned and when burning can occur. Permits are mainly administrative and used to help track or prevent PM emissions from burning activities.
Part V, Section 2.0	Fugitive Dust	Sets requirements for fugitive dust generating activities and lists exemptions for residences, road maintenance, and normal farming practices. Sets limitations and standards, control measures, and work practices for fugitive dust generating activities. Requires permits and dust control plans for earthmoving operations which exceed 1.0 acre. See section 3.1.1 for more detail.
Part VI, Section 1.0	Visible Emissions	Sets a visible emission (opacity) limit of no more than 20% for any source of air contaminant emissions on the Community
Part VII, Section 3.0	Aggregate Processing	Sets emission limits, operating requirements and performance testing requirements for nonmetallic mineral mining operations, concrete batch plants, vermiculite and perlite expansion furnaces and hot mix asphalt plants. Contains specific (particulate matter/dust) emission limits, including reduced opacity limits, for different operations at nonmetallic mineral mining operations including material handling systems, transfer points, crushing operations, and control devices.

3.1.1 Fugitive Dust

The Fugitive Dust Rule (Part V, Section 2.0) regulates Fugitive Dust Generating Operations that can contribute to PM10 concentrations measured during exceptional events. Fugitive Dust Generating Operations includes sources capable of generating fugitive dust; land clearing, earthmoving, excavating, construction, demolition, material handling, storage and/or transporting operations, vehicle use and movement, the operation of any outdoor equipment, or unpaved parking lots. Under this rule, any potential sources of fugitive dust, either property or activity, must take reasonable precautions to reduce particulate matter emissions. Visible emissions are restricted to 20% opacity or under for all potential sources of particulate emissions. Reasonable precautions must be taken in order to stay under this 20% limit, which allows for dust control and less risk for severe weather causing dust hazards and storms. Reasonable precautions include:

- The use of water or chemicals for control of dust during demolition of structures, construction operations, grading of roads, or clearing of land.
- Application of asphalt, water, or other suitable chemicals on unpaved roads, materials stockpiles, and other surfaces which can create airborne dust.
- Full or partial enclosure of materials stockpiles in cases where application of water or chemicals is not sufficient or appropriate to prevent particulate matter from becoming airborne. Implementation of good housekeeping practices to avoid or minimize the accumulation of dusty materials which have the potential to become airborne. This includes, but is not limited to, manual sweeping and the use of industrial vacuum cleaners.
- Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials.
- Adequate containment during sandblasting or other similar operations.
- Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne.
- The prompt removal from paved streets of earth or other material which does or may become airborne.

The Fugitive Dust Rule requires earth-moving permits and dust control plans for any earthmoving operation greater than 1.0 acre. The dust control plan requires operators to identify a primary control measure as well as a contingency control measure for several different types of dust-generating activities. For all fugitive dust sources, the contingency control measure is carried out when the primary control measure is ineffective for dust control.

3.2 Voluntary Measures

Some farming operations on the Community already use voluntary best-management practices (BMPs) to reduce dust generation from agricultural activities. The AQP is currently in the process of surveying all farms and agricultural operations on the Community to learn what BMPs they are regularly using to help mitigate dust generation (see Appendix B). Once this inventory is complete, the Air Quality Program will be able to assess the feasibility of implementing a formal voluntary agricultural BMP program.

Additionally, the GRIC Department of Transportation voluntarily implements dust control measures (e.g., watering, application of asphalt millings or aggregate base material) when maintaining some of the unpaved roads on the Community.

3.3 Minimizing Public Exposure to High Concentrations of PM

The Air Quality Program is working to minimize public exposure to high concentrations of PM through its outreach strategies mentioned in Section 2 of this Plan (see also Appendix A). These strategies ensure the Community is well informed about dust hazards and threats. Prompt notification about air quality threats, as well as long-term outreach about dust hazards and preventing dust generation, will help to minimize overall public exposure to windblown dust. DEQ and the Air Quality Program will continue to perform outreach about their programs and how they work to protect Community health and prosperity.

3.4 Collecting and Maintaining Exceptional Event Data

The AQP is currently developing a standard operating procedure to ensure consistency in reporting and communicating exceptional events. The AQP collects data on potential exceptional events before their

occurrence through receiving and archiving windblown dust alerts from other agencies (e.g. Pinal County, Maricopa County, ADEQ, National Weather Service). The AQP also looks for forecasting and other information from local media and news sources, and archives the information. Forecasted information is collected for more than just potential exceedances, including strong winds that could potentially expose the Community to health and safety hazards.

Once an exceedance occurs at a monitor, all monitoring and meteorological data from that exceedance day is collected and archived. This data is then compared with collected forecasting data on dust storms and high wind events. Exceptional events are flagged on a quarterly basis.

In addition, GRIC consults with other nearby governmental air quality programs to gather and share data on exceedances in order to understand if they were caused by larger-scale (regional) exceptional events. Data collection on exceptional events will continue with partnerships with Maricopa and Pinal Counties' forecasting, as well as with Arizona Department of Environmental Quality (ADEQ) information and alerts.

Annual flagged event data is communicated to Community members through the Ambient Air Monitoring Network Review that is released annually by the AQP. AQP employees participate in an open house to discuss air quality, exceedances, and exceptional events with Community members.

3.5 Consultation with Other Air Quality Managers

The AQP plans to consult with other air quality agencies (40 CFR 51.930(b)(2)(ii)(D)), such as the Maricopa County Air Quality Department, Pinal County Air Quality Control District, and the ADEQ, to coordinate demonstrations for exceptional events and share outreach information. Often exceptional events that occur on the Community also occur in neighboring jurisdictions (e.g., Maricopa County or Pinal County) and may be considered regional events.

The AQP currently works with ADEQ and the Maricopa Association of Governments (MAG) to coordinate demonstrations and data on an as-needed basis. The AQP has a working relationship with these air quality agencies to coordinate information about exceptional events and use these partnerships to improve the air quality of the region.

4 IMPLEMENTATION AND REVIEW

4.1 Periodic Review and Evaluation

The AQP will review and evaluate the effectiveness of this Dust Mitigation Plan at least every two years to comply with 40 CFR 51.930(b)(2)(iii) of the Exceptional Events Rule and to help improve Community health and safety with respect to air quality. If any rule-making or changes occur related to particulate matter monitoring and outreach, the Dust Mitigation Plan will be reviewed. If an update to this Plan is deemed necessary, the AQP will engage stakeholders in the plan revision process and conduct a public comment period in accordance with the process identified in Section 4.2. Updated plans will be submitted to the EPA after public review.

4.2 Public Comments

The Dust Mitigation Plan was posted on August 29, 2018, for a 30-day public comment period (40 CFR 51.930(b)(2)(iii)(A)(1)). Notification about public review and comment period was published on Gila River Indian News, the GRIC DEQ website (www.gricdeq.org), the GRIC Government Intranet, and www.mygilariver.com. The Plan was also submitted to the GRIC Natural Resources Standing Committee for review and comment on September 25, 2018. Any comments received are attached to this Plan and addressed (see Appendix C).

Appendix A

Example Air Quality Alert & Advisory

AIR QUALITY ALERT

Gila River Indian Community
Air Quality Program

High winds and possible blowing dust are forecast for DATE and areas of the Community may experience 24-hour average PM_{10} (dust) concentrations in excess of the national health standard.

WHAT YOU CAN DO TO HELP REDUCE DUST GENERATION:

- Avoid travel on unpaved roads where possible
- Reduce speed of travel on unpaved roads
- Avoid travel off-road and disturbing soil
- Limit earthmoving and other soil disturbance activities during high wind periods
- Make sure disturbed areas are properly stabilized after conducting earthmoving activities

The Air Quality Program and the Department of Environmental Quality appreciate any efforts taken to reduce dust generation throughout the Community during high wind periods

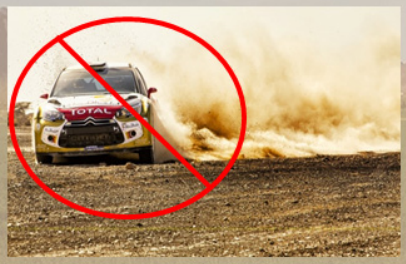
air@gric.nsn.us

DATE GRIC Air Quality Program

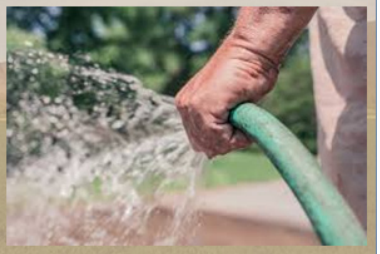
High Wind/Blowing Dust Advisory

WHAT YOU CAN DO TO REDUCE DUST GENERATION AND MINIMIZE EXPOSURE:

Stay indoors and prevent dust exposure



Avoid off-road travel and slow down on unpaved roads!



Plant vegetation and water dry land to stabilize soil

For questions or comments, please email air@gric.nsn.us

Appendix B

Example Agricultural BMP Survey Form

Survey on Agricultural Best-Management Practices (BMPs) for reducing particulate-matter pollution

Name: _____ Date: _____

Farming Operation: _____ District: _____

Please fill out the following survey about the practices that your operation uses. Any BMP definitions are defined in the attachment below.

1. **Please select which of the following Tillage, Harvest, or Ground Operation BMPs your farming operations uses:**

- ☐ Chemical Irrigation
- ☐ Combining Tractor Operations
- ☐ Equipment Modification
- ☐ Green Chop
- ☐ Integrated Pest Management
- ☐ Limited Harvest Activity
- ☐ Limited Tillage Activity
- ☐ Multi-Year Crop
- ☐ Cessation of Night Tillage
- ☐ Planting based on Soil Moisture
- ☐ Precision Farming
- ☐ Reduced Harvest Activity
- ☐ Reduced Tillage Activity
- ☐ Tillage Based on Soil Moisture
- ☐ Timing of Tillage Operation
- ☐ Transgenic Crops
- ☐ Transplanting
- ☐ Shuttle System/Large Carrier
- ☐ Conservation Tillage
- ☐ Other: _____

2. **Please select which of the following Non-Cropland and Commercial Farm Roads BMPs your farming operation uses:**

- ☐ Access Restriction
- ☐ Aggregate Cover
- ☐ Wind Barrier
- ☐ Critical Area Planning
- ☐ Organic Material Cover
- ☐ Reduce Vehicle Speed
- ☐ Synthetic Particulate Suppressant
- ☐ Track-out Control System
- ☐ Watering
- ☐ Other: _____

3. **Please select which of the following Cropland BMPs your farming operation uses:**

- ☐ Wind Barrier
- ☐ Cover Crop
- ☐ Cross-wind Ridges
- ☐ Chips/mulches
- ☐ Surface Roughening
- ☐ Permanent Cover
- ☐ Stabilization of Soil Prior to Plant Emergence
- ☐ Residue Management
- ☐ Track-out Control System
- ☐ Sequential Cropping
- ☐ Other: _____

4. **Please select which of the following Significant Agricultural Earth-Moving Activities BMPs your farming operation uses:**

- ☐ Apply Water Prior to Significant Agricultural Earth Moving Activities and/or Time to Coincide with Precipitation
- ☐ Apply Water During Significant Agricultural Earth Moving Activities
- ☐ Limit Significant Agricultural Earth Moving Activities on Day Identified by Pinal/Maricopa County Dust Control Forecast to be high risk for dust generation
- ☐ Conduct Significant Earth Moving Activities in a Manner to Reduce a Minimum of One Ground Operation by Using Equipment that is the Most Efficient Means of Moving the Soil

Appendix C

Public Comments

No public comments were received during the 30-day public comment period.

The following questions/comments were received during presentation of the Dust Mitigation Plan to the GRIC Natural Resources Standing Committee:

1. Q: It appears there has been tilling for no reason in the area of [State Route] 347 & Riggs Road.
   A: Tilling is conducted as part of the normal farming practice. Part of the agricultural outreach surveys will be to assess current farming practices that generate dust.

2. Q: Regarding the survey developed for the voluntary agricultural best management practices, is the plan to survey all of the farms?
   A: Yes, the current plan is to eventually survey all of the farms.

3. Q: The wild horses in the Sacate area [in southern half of Districts 5 & 6] seem to generate a lot of dust. Is there anything being done about the horses?
   A: Over the years, the Air Quality Program has received notices about the dust from the wild horses – mainly from regulated rock products facilities in the area. The DEQ Wildlife Program is assessing the wild horse population on the Community and the Air Quality Program plans to work with the Wildlife Program on assessing dust contributions from the wild horses.