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| Tribal School Air Toxics Monitoring Application packetEPA/OAQPS and TAMS |

1. **Background: Tribal School Air Toxics Monitoring Project Proposal**

U.S. Environmental Protection Agency (EPA) has recommended air quality monitoring at 63 schools around the country as part of a new initiative to ensure children are breathing healthy outdoor air. EPA identified schools for monitoring based on information that raised some questions about air quality that merit investigation. That information included the best data available to EPA scientists about air pollution in the vicinity of schools, results of a computer modeling analysis, results from a recent newspaper analysis, and information from state and local air agencies. Unfortunately, because of limited information on tribal schools[[1]](#footnote-1) and limited emissions information, most tribal schools could not be considered in time for EPA’s analysis of the schools initially chosen to conduct monitoring. The term “tribal school” refers to any school located within a reservation boundary or any school operated by a tribe, BIA or tribal agency (regardless of location). EPA is still concerned that lack of information/data does not necessarily mean there is not a problem in Indian country and wants to ensure that we are investing in potential air toxics impacts around tribal schools as well. In order to accomplish this parallel effort to the national study, EPA, working with the Regional Offices, identified two tribal schools with appropriate conditions to initiate this monitoring effort.

Complete Article: http://www.usatoday.com/news/nation/environment/school-air-monitoring1.htm

**Proposed Approach for the Tribal School Monitoring Analysis**

Monitoring at first two schools: As in the national analysis, EPA will provide monitors and analysis following the requirements of the national monitoring plan and QAPP for these two schools. The tribes have the capacity and agreed to conduct the monitoring.

After the 60 – 90 day monitoring study is completed monitors will be transferred to the Tribal Air Monitoring Support (TAMS) Center for further deployment. Once the EPA monitoring program is over, the monitors will be provided to the TAMS Center to support activities in Indian country as appropriate.

A tribal working group of environmental professionals and representatives of the TAMS Steering Committee will determine the protocol for further deployment of monitors. Some criteria discussed on the first call included:

* + Some demonstrated source of air toxics concernincluding point source(s), mobile sources, non-traditional sources like open burning, and garbage burning.
	+ Tribe’s willingness to provide location information of the tribal school and submission of monitoring data through the AQS process.
	+ School is on/off the reservation or has a presence/location of schools on/off the reservation.
	+ Tribe has the capacity to run the monitors for the 60- 90 day period or availability of TAMS staff support for that or funding available for contractor support.
	+ Presence/location of daycare sites on/off the reservation.

EPA will work with the RTOCs and NTOC to reach out to the tribes to determine interest in participating in the school monitoring effort. We will also work with BIA or NCAI to reach tribes that don’t have strong environmental programs and don’t participate in TOCs. Interest will be evaluated against criteria developed by the workgroup with the decision made by the TAMS steering committee.

Monitors will be rotated to new locations as available. Decisions on the length of time for the monitoring will be determined by the TAMS steering committee.

If any problems are found, the appropriate EPA Regional Offices, OECA, OAQPS, and other offices, in consultation with the tribe, will determine the appropriate actions. In some cases, there may be targeted enforcement, in others permit or regulatory action may be needed, and in other cases community initiatives may be necessary.

* Data will be captured on the tribal air site and linked to the national school program site ([www.epa.gov/schoolair](http://www.epa.gov/schoolair)). The workgroup requested that the schools be identified on the national School Air toxic map and the tribal boundaries also be identified.
1. **Planning and Operations Procedures: Tribal School Air Toxics Monitoring Study**
* Monitors have been transferred to the TAMS Center, from EPA for deployment to **Tribal** applicants across the country. An application packet, criteria and process has been developed for those interested in monitoring.
* **Tribes** will be selected for monitoring as monitors are available and applications are processed. Schedule for monitoring and selection to be determined and approved by the TAMS Steering Committee and technical staff.
* Monitoring and analysis will follow the requirements of the national School Toxics Air Monitoring Initiative Quality Assurance Project Plan, Standard Operating Procedures, and/or approved plans for each of the selected schools.
* **Tribal** capacity will be assessed for running monitors; if technical assistance or training is needed/requested every attempt will be made to hold training for the Tribes interested in the program.
* The **Tribe** must agree to monitor and report data to the Tribal air toxic database.

**LOGISTICS:** After completion of a monitoring cycle the monitors are to be transferred to a location determined by the Tribal Air Monitoring Support (TAMS) Center Steering Committee. The monitors will remain assigned to the TAMS Center to support further monitoring activities in Indian country, as appropriate.

**PROCEDURES AND PROCESSES:** Monitors will be rotated to new school locations through an application process. Decisions on the schools, school priority and length of time for the monitoring will be determined by criteria developed and a process agreed upon by the Tribal planning team and the TAMS Steering Committee. The TAMS Steering Committee will update guidance as necessary and appropriate to improve the decision process.

* + Application will be submitted to TAMS Center Co-Directors. (see below)

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| EPA TAMS Co-Director | ITEP TAMS Co-Director | TAMS Technical Assistance |
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* + Applications and will be prioritized and assessed by voting members of the TAMS Steering Committee.
	+ When applying for monitoring the Tribes should identify when they will be ready for deployment of monitoring, if approved monitors need to be deployed as soon as possible and should not sit idle.
	+ A calendar of rotation, training, etc. will be maintained by the TAMS Center. Alternates will be identified in case a tribe is unable take their assigned rotation.

**OUTREACH:**

EPA and TAMS Center will work with the regional and national tribal organization to outreach to all tribes, even those without air programs, to promote interest in participating in the school monitoring project. Interested parties will be given application information and resources to learn more about the Tribal School Air Toxics Project. Outreach efforts will be in the form of:

* Newsletters, Fact Sheets, pamphlets
* Poster Sessions at National Tribal Meetings
* Canned presentations to share with those who are going to be presenting
* Presentations on conference calls or regional meetings
* Interagency presentations of the project to reach other Tribes who do not have air programs
* Resource feedback and sharing of experienced tribal monitoring
* Training of prospective tribal programs or select points of contact for monitoring project

**ANALYSIS and Next steps:**

If any problems are identified through monitoring, the appropriate EPA Regional Offices, OECA, OAQPS, and other offices, in consultation with the tribe, will determine the appropriate actions. In some cases, there may be targeted enforcement, permit, and regulatory actions, or community initiatives may be necessary.

**DATA TRACKING:**

Data will be captured on the tribal air website and linked to the national school air toxic program site. All data will need to be submitted to AQS, if technical assistance is needed to complete this please make sure the application reflects this need. National map will be updated with completed schools.

*Note: Selected applicants will be required to sign and submit TAMS monitor agreement.*

1. **Application for Tribal School Air Toxics Monitoring**

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| Date: |  |
| **Name of Tribe** |  |
| Address |  |
|  |  |
| Background of **Tribe** and proposed schools or educational program |
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| Identified School Name |  |
| Address of School(s) |  |
| Lat and Long for school site |  |
| Grades and ages of children attending application school site |  |
| Is the school in the presence of /or on the reservation?  | YES or NO |
| If not on reservation, describe native population? (Estimated ratio stats from the school, etc.) |
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| Please describe the suspected sources of Air Toxics possibly impacting the identified school and type of monitoring to be requested? (Ex. Open burning, garbage burning, mobile sources, etc.) *See attached inventory.* |
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| Identify who the possible affected population would be and how they may be impacted? (Elementary age, infants, etc.) |
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| For this application, approval should be obtained to submit monitoring data to Air Quality Systems database and/or an OAQPS national tribal database?  |
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| If the tribe agrees to submit data, please explain the tribe’s technical capacity available to submit data, or explain the need for technical assistance? |
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| Explain your T**ribe’s** technical capacity to operate the monitors or will technical assistance and/or what training will be required? |
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| Is a designated person available at the Tribe to take training or be the point of contact for this project, if so please identify? |
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| Attach Photos of the 4 cardinal directions of the school or monitoring location. |
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| When is the projected time for deployment of the monitors? (i.e. immediately, 3 months) |
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1. [↑](#footnote-ref-1)