AIR PROGRAM DEVELOPMENT & GAP FUNDING

ITEP WEBINAR SERIES
AUGUST 11, 2020

“INTRODUCTION TO TRIBAL AIR QUALITY”

PRESENTED BY
CRIT ENVIRONMENTAL PROTECTION OFFICE
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AND
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CRIT ORIENTATION

Comprised of four distinct tribes: Mohave, Chemehuevi, Hopi, Navajo.

Established: March 3, 1865.
The reservation is both non-attainment and serious non-attainment on the California side. However, the Arizona side is considered “unclassifiable/attainment” under area designations.
OVERVIEW

I

NEW TO THE FIELD: ACRONYMS

II

HISTORY OF THE EPA, YOUR TRIBE, AND THE CAA (R10 FARR FOR AK)

III

TRAINING: INTRODUCTORY COURSES ON AIR QUALITY

IV

GAP, GAP GUIDANCE (APPENDIX I, SECTION C), & ETEP’S
NEW TO THE FIELD

DON'T BE ALARMED!

CAA
CLEAN AIR ACT

AQI
AIR QUALITY INDEX

AAQS
AIR QUALITY SUBSYSTEM

QAPP
QUALITY ASSURANCE PROJECT PLAN

NEI
NATIONAL EMISSIONS INVENTORY

OAQPS
OFFICE OF AIR QUALITY PLANNING & STANDARDS

PCBs
POLYCHLORINATED BIPHENYLS

EIS
EMISSIONS INVENTORY SYSTEM

QAPP
QUALITY ASSURANCE PROJECT PLAN

NSPS
NEW SOURCE PERFORMANCE STANDARDS

EPA R10
ENVIRONMENTAL PROTECTION AGENCY

NTAA
NATIONAL TRIBAL AIR ASSOCIATION

NEI
NATIONAL EMISSIONS INVENTORY

FEM
FEDERAL EQUIVALENT METHOD

RCRA
RESOURCE CONSERVATION RECOVERY ACT

FARR
FEDERAL REFERENCE METHOD

FARR
FEDERAL EQUIVALENT METHOD

NEPA
NATIONAL ENVIRONMENTAL PROTECTION ACT

AIR QUALITY INDEX

AQS
AIR QUALITY SUBSYSTEM

AQI
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NAAQS
NATIONAL AMBIENT AIR QUALITY STANDARDS

OAQPS
OFFICE OF AIR QUALITY PLANNING & STANDARDS

EPA R10
ENVIRONMENTAL PROTECTION AGENCY

RCRA
RESOURCE CONSERVATION RECOVERY ACT

NEPA
NATIONAL ENVIRONMENTAL PROTECTION ACT
GET FAMILIAR

WHO IS BEING EFFECTED, WHO ARE THE POLLUTERS, WHAT ARE THE POLLUTANTS, WHAT MEASURES HAVE BEEN TAKEN, IF ANY, WHAT OTHER AQ AGENCIES ARE MONITORING NEARBY, WHAT IS THE PLAN, WHEN WERE NEGATIVE IMPACTS DISCOVERED, WHEN WAS ACTION TAKEN, IF ANY, WHERE DOES THE TRIBE STAND WITH EPA AND GRANTS, WHERE ARE YOU LOCATED (RURAL/CITY/MOUNTAIN TERRAIN), WHERE ARE THE POLLUTANTS COMING FROM, WHY HASN'T AN AQ PROGRAM STARTED IN THE PAST, WHY/HOW WILL AN AQ PROGRAM BENEFIT THE TRIBE

IS IT PRACTICABLE/FEASIBLE?

IS THE TRIBE LOCATED WITHIN AN AREA DESIGNATION OF ATTAINMENT, NON/SERIOUS-ATTAINMENT, NON-CLASSIFIED. ARE THERE NEARBY FRM MONITORING ACTIVITIES. WILL THE AQ PROGRAM FILL A DATA GAP WHAT IS THE FISCAL REALITY THAT EXISTS IN YOUR REGION.
A BRIEF TIMELINE

FY13: Initiated development of draft emissions inventory (EI) through internal CRIT funding support

FY16: AQS hired through GAP funding to assist Tribe in developing air quality program

FY17: EI finalized and approved by EPA under GAP funding

FY18: HIRED NEW AQS IN 2018 THROUGH GAP FUNDING TO BUILD CAPACITY AND FOCUS ON AIR PROGRAM DEVELOPMENT

FY19: Training/capacity building, QAPP development for PM10, IAQ, Diesel emissions reduction, outreach, draft CRIT AQ codes

FY20: Submit draft QAPP to EPA, awarded CAA § 103 funding

DON’T BE DISCOURAGED

BE AWARE

REDUCED FUNDING !!!!!

FY21 GAP COMMENTS FROM EPA R9

There were $21M in GAP FY21 requests and $16M in available GAP funding for FY21;

There were discrepancies between the cost estimator tool, budget and workplan such that commitments, FTE or budget line items were not approved if the files were not in agreement; and

Four air commitments were not funded due to anticipated funding by the CAA for FY21

THIS CAN HAPPEN

SO CAN THIS

CARBON REGENERATION FACILITY – RCRA PART B PERMIT
III

TRAINING

STAFF AND DEPARTMENTAL DEVELOPMENT
EMPLOYEE KNOWLEDGE OF AIR QUALITY? CAPACITY TO LEARN? WILL TRIBE ALLOW FOR NEW-HIRE? WITH NEW EMPLOYEE, COMES TRAINING. WILL TRIBE ALLOW FOR TRAVEL AND TRAINING?

LEADERSHIP / DIRECTORSHIP CONSIDERATIONS
HISTORY OF SUCCESSFUL LEADERSHIP / DIRECTORSHIP? KNOWLEDGE OF PROGRAMS AND POLICY (INTERNAL AND EPA)? SUCCESS OF PAST PROGRAM DEVELOPMENT (START UP TO CURRENT)

HISTORY
SIGNIFICANT ENVIRONMENTAL IMPACTS . REGIONAL ISSUES . LOCAL ISSUES . HEALTH & SAFETY OF THE TRIBAL COMMUNITY WHAT PROGRAMS HAS YOUR ENVIRONMENTAL DEPARTMENT MANAGED . WAS AN AIR QUALITY PROGRAM INITIATED IN THE PAST? IF SO, WHY DOES IT NO LONGER EXIST? (FUNDING ISSUES, PERSONNEL LOSS, WORKPLAN PROJECTS INCOMPLETE?)
EPA OFFERS ONLINE TRAINING COURSES THROUGH THE AIR POLLUTION TRAINING INSTITUTE APTI

INSTITUTE FOR TRIBAL ENVIRONMENTAL PROFESSIONALS OFFERS ONLINE AND CLASSROOM TRAINING COURSES AS WELL AS PROFESSIONAL CONTACTS.

TRIBAL + STATE + LOCAL
REACH OUT TO AIR / ENVIRONMENTAL PROGRAMS IN YOUR AREA. ASK QUESTIONS, ASK FOR ADVICE, DO THEY HAVE CONTENT THEY WOULDN'T MIND SHARING? SEE ABOUT FIELD TRAINING OPPORTUNITIES. WE ARE ALL WORKING TOWARDS THE SAME GOALS.
BEGIN WITH

EPA – TRIBAL ENVIRONMENTAL PLANS

ESTABLISH BENCHMARKS, SUCH AS:

IDENTIFY AND INVESTIGATE IMPACTS OF NEIGHBORING SOURCES ON TRIBAL AIR QUALITY;
ACQUIRE EXISTING AIR QUALITY DATA FROM NEIGHBORING JURISDICTIONS;
DEVELOP AN EMISSIONS INVENTORY;
GENERATE AN AIR PROGRAM NEEDS ASSESSMENT.

ENSURE AIR PROGRAM DEVELOPMENT IS IN YOUR 5 YEAR “APPROVED” PLAN,

CAVEAT LANGUAGE (REVISIT EACH YEAR)

RESEARCH REGION RESOURCES

IMPLEMENTATION OF TRIBAL STANDARDS (84 INDIAN POLICY)

GAP PROGRAM DEVELOPMENT* - STATUTE V. GUIDANCE INTERPRETATION

*COOPERATIVE AGREEMENTS / CONSIDERATIONS
FOREIGN, COMPLICATED AND CONFUSING (FOR THOSE NEW TO GAP)

STOP AND TAKE A BREATH!

STARTING FROM THE BEGINNING
FOLLOWING THE GUIDANCE DOCUMENTS BASED UPON FUNDING TYPE AND EXISTING POLICY

IDENTIFY THE NEEDS OF YOUR TRIBE.
SELECT ACTIVITIES THAT WILL BEST SUIT YOUR TRIBE AND END GOALS.
CREATE AN ACTION PLAN FOR EACH.

STARTING WITH AN EXISTING WORKPLAN
A WORKPLAN ALREADY IN PLACE

TAKE THE TIME TO REVIEW THE GUIDANCE DOCUMENTS BASED UPON FUNDING TYPE.
EVALUATE THE EXISTING WORKPLAN. IDENTIFY THE NEEDS OF YOUR TRIBE.
CROSS EXAMINE THE EXISTING WORKPLAN WITH THE NEEDS OF YOUR TRIBE.
DOES IT MAKE SENSE OR WILL IT BE BENEFICIAL TO MAKE UPDATES.
THE CAA SECTIONS/CODE OF FEDERAL REGULATIONS

CLEAN AIR ACT OVERVIEW

CLEAN AIR ACT TITLE I AIR POLLUTION

CODE OF FEDERAL REGULATIONS

CFR TITLE 40
GENERAL ASSISTANCE PROGRAM (GAP)

TRIBES CAN USE GAP FUNDING TO CONDUCT *BASELINE ASSESSMENTS OF AIR QUALITY, WHICH CAN TAKE ONE OR UP TO SEVERAL YEARS TO COMPLETE (THOUGH MAY NOT EXCEED FIVE YEARS). AT THE END OF THE PROJECT PERIOD, A TRIBE WILL ASSESS WHETHER FUTURE AIR ACTIVITIES ARE NEEDED, AND FOR WHAT TYPE OF FUNDING TO APPLY

* NO IMPLEMENTATION

TYPICAL AIR PROGRAM DEVELOPMENT ACTIVITIES UNDER GAP

TRAINING
- DEVELOP AN EMISSIONS INVENTORY
- AIR PROGRAM NEEDS ASSESSMENT
- ACQUISITION OF EXISTING AIR QUALITY DATA FROM NEIGHBORING JURISDICTIONS
- INVESTIGATE IMPACTS OF NEIGHBORING SOURCES ON TRIBAL AIR QUALITY
- DEVELOPING TRIBAL CODES AND ORDINANCES TO REGULATE SOURCES OF AIR POLLUTION

COMMUNITY OUTREACH/EDUCATION
- PARTICIPATE IN REGIONAL INITIATIVES
- COMMUNITY OUTREACH/EDUCATION
- DEVELOP A DRAFT MONITORING PLAN
- SUBMIT A CAA § 103 PROPOSAL
## TYPES OF FUNDING & INFORMATION GATHERING

### RESEARCH

<table>
<thead>
<tr>
<th>Organizations</th>
<th>Links</th>
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<tbody>
<tr>
<td>National Tribal Air Association</td>
<td><a href="https://www.nationaltindustrialhealth.org">National Tribal Air Association</a></td>
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<tr>
<td>Institute for Tribal Environmental Professionals</td>
<td><a href="https://www.itep.org">Institute for Tribal Environmental Professionals</a></td>
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<td>Inter Tribal Council of Arizona</td>
<td><a href="http://www.triberc.org">Inter Tribal Council of Arizona</a></td>
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<td>Inter Tribal Council of Nevada</td>
<td><a href="http://www.triberc.org">Inter Tribal Council of Nevada</a></td>
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<tr>
<td>Tribal Healthy Homes Network</td>
<td><a href="http://www.healthyhomesnetwork.org">Tribal Healthy Homes Network</a></td>
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### ACRONYMS

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<tr>
<th>Code</th>
<th>Description</th>
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<tbody>
<tr>
<td>CAA</td>
<td>Clean Air Act Overview</td>
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<tr>
<td>EPA</td>
<td>Environmental Protection Agency</td>
</tr>
<tr>
<td>ATIC</td>
<td>Ambient Monitoring Technology Information Center (AMTIC)</td>
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<tr>
<td>AQE</td>
<td>Air Quality System (AQS)</td>
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<tr>
<td>AQI</td>
<td>Air Now AQI, Current Fire Alerts, Air Quality Index Calculator, AQI Flag Program</td>
</tr>
<tr>
<td>CFR</td>
<td>Code of Federal Regulations</td>
</tr>
<tr>
<td>NAAQS</td>
<td>National Ambient Air Quality Standards (NAAQS)</td>
</tr>
<tr>
<td>FRM/FEM</td>
<td>Federal Reference and Equivalent Methods (FRM/FEM)</td>
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<td>NRMM</td>
<td>National Reference Methodology Monitoring</td>
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STOP LOOK AND LISTEN
WHAT ARE THE TRIBES’ CONCERNS WITH AIR QUALITY? HOW IS THE COMMUNITY EFFECTED?
HAVE SOURCES OF POLLUTION BEEN IDENTIFIED?

TRIBAL
CONNECT WITH OTHER TRIBAL AIR/ENVIRONMENTAL PROGRAMS. ASK QUESTIONS, ASK FOR
EXPERIENCES, FOR OPINIONS, FOR EXAMPLE DOCUMENTS, PROCESSES & PROCEDURES. WE ARE
ALL WORKING TOWARDS THE SAME GOALS.

IF YOU DON’T ASK, YOU WILL NEVER KNOW. EVERYTHING IS WORTH BRINGING UP

STATE + LOCAL + FEDERAL
REACH OUT TO OTHER AIR/ENVIRONMENTAL PROGRAMS IN YOUR AREA, THEY MAY HAVE THE
SAME CONCERNS FOR POLLUTION IN YOUR AREA AND ALREADY KNOW HOW TO TACKLE THE
PROBLEM.
CLOSING & QUESTIONS

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