



Tier I: Module 2

**Enhancing a CERCLA 128(a):
Tribal Response Program
Element 1: Inventory**



Element 1: The “Law”

CERCLA Section 128(a)(1)(A)(i) lists the four elements of a State or Indian Tribe response program:

Element 1: Timely survey and inventory of brownfield sites.

Congressional Record: "...a system or process to identify the universe of brownfield sites in their tribal lands."



What is a “Brownfield”?

“brownfield site” means real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant.

Anvik



Metlakatla



Prominent odor and distressed vegetation surround three collapsed 80,000 gallon fuel storage tanks.

Metlakatla



AST's, spills, barrels; one area was used for a firing range.



Former Fuel Storage Area – Hughes, AK

OLD COMMUNITY DUMP SITES



South Bank Dump Site – Alakanuk, AK







ILLEGAL DUMPS



ABANDONED/BURNED BLDGS.







Old Public Health Service/Generator Building – Arctic Village, AK



Closed Cannery

Marinas



Former Utilized Defense Sites (FUDs)



Former Dew Line “White Alice” Sites (North Field)

Abandoned Mines



E-waste & Guano



Contaminated Homes



06/22/2006



Lead Based Paint



Safety & Health Hazards

Ongoing Problems





ORGANIZED VILLAGE OF KASAAN

BROWNFIELDS PROJECT INFORMATION

[Return to Main Site](#)

Map Views:

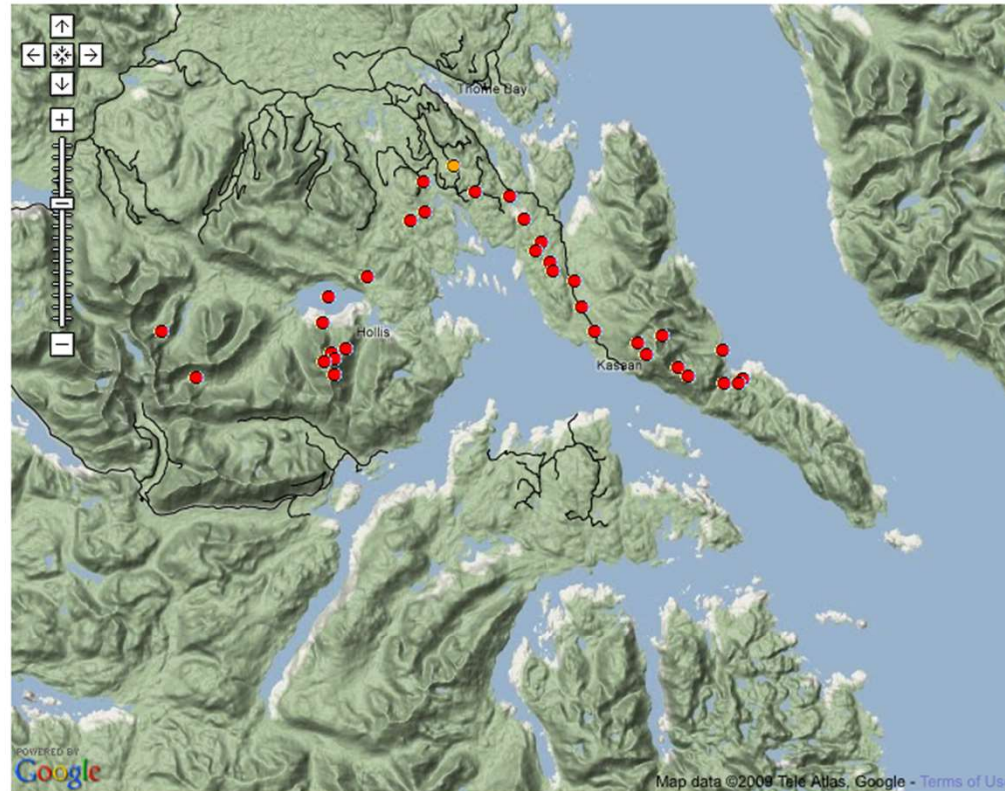
- Kasaan Area
- Ross Adams

Available Data:

- Sites
- Roads
- Kasaan Bay Watershed

Brownfield Project Sites

- Possible site (not evaluated)
- Site to be evaluated
- Evaluated site

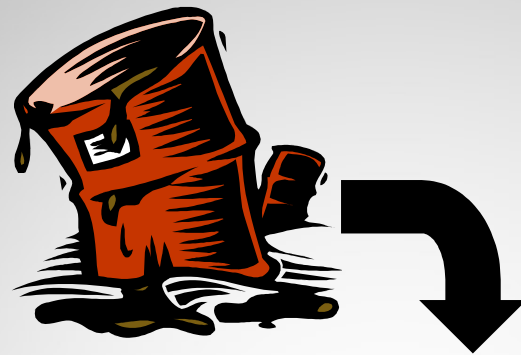


To view the Google Earth Plug-In version of this site [Click Here](#) (download required)

Additional Brownfield information: [What is a Brownfield?](#) (Alaska Dept. of Environmental Conservation) and [U.S. EPA Brownfield Program](#)

For information on this project, please contact Neli Nelson, OVK Brownfield Coordinator neli@kasaan.org

Brownfield Site Discovery & Inventory



Visual Inspection

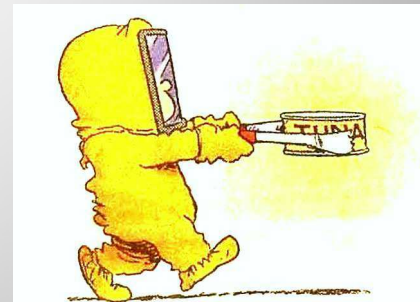
Public Report

**Brownfield
Site Discovery**

Other Data Bases

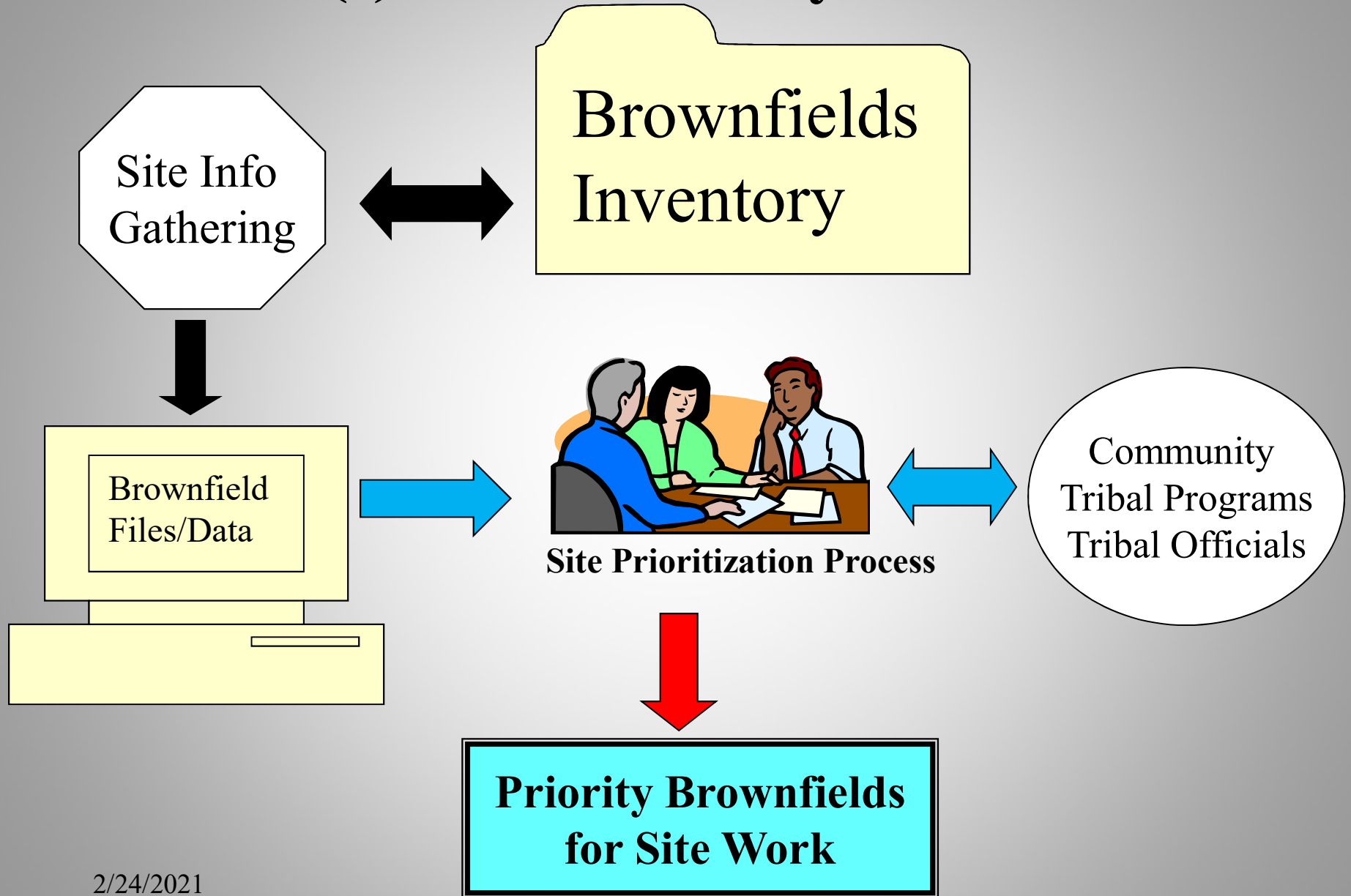
Incident/Spill

Brownfield
Files/Data



Emergency Response ?

Brownfield(s) Site Inventory & Prioritization





How Many Brownfields?

The Congressional Record states: “there are an estimated 450,000 brownfield sites, there are fewer than 1,300 NPL sites”. Therefore:

- 1)** No one really knew how many brownfield sites there are across the country, including on the Reservations or other tribal lands; and
- 2)** The U. S. EPA Superfund Program does not have the capacity to address all of the brownfields in the country.



Whose Inventory is it?

- Federal Govt.?
- US EPA?
- Tribe/Village?
- Yours?
- States?



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- ~~Federal Govt.?~~
- ~~US EPA?~~
- Tribe/Village ←
- ~~Yours?~~
- ~~States?~~



Which Brownfields ?

- On tribal land ?
- In tribal jurisdiction or Village ?
- On Federal, State or Trust land ?
- May Impact tribal land or Village ?
- May impact tribal members ?
- All of the above ?



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Whose Brownfield Definition Applies?

- Congress
- US EPA
- CERCLA Section 101 (39)
- State
- Webster's Dictionary
- Tribe/Native Village



Whose Brownfield Definition Applies?

- Congress
 - US EPA
 - CERCLA Section 101 (39)
 - State
 - Webster's Dictionary
 - **Tribe/Native Village** * ←
- * for inventory purpose only



EPA Guidance

EPA's goal in funding activities under this element is to enable the tribe to establish or enhance a system or process that will provide a reasonable estimate of the number, likely locations, and the general characteristics of brownfields in their area.



General Guidelines:

- All tribes are urged to begin the establishment of their brownfield inventory in the first year of the program grant.
- A Tribe may use its own judgment or definition of what is a “brownfield” for the purpose of developing the inventory. EPA will not require states and tribes to develop a “list” of brownfields sites.



General Guidelines:

- At a minimum, the tribe should develop and/or maintain a system or process that can provide a reasonable estimate of the number, likely location, and general characteristics of brownfields sites within their tribal lands.
- Database systems and formats available



Snow-machines are a winter transportation means.



Two seater Super Cub on floats.

How to inventory Brownfields in Alaska



Skiffs are common transportation during ice free months.



Father and son dog musher at Koliganek.



Sources of Brownfields Info.

- Field survey of tribal communities and/or lands (go look!)
- Review of existing inventories, reports or databases such as:
 - UST/LUST inventories
 - Open Dump Surveys (IHS, EPA)
 - Abandoned Mine Inventory (states/USGS)
- Insurance maps
- Old topographic maps and aerial photos



Sources of Brownfield Info.

- RCRA treatment, storage & disposal facility lists
- US EPA CERCLA/Superfund PA & RI/FS Reports
- Oil & gas well inventories (BLM, USGS, State)
- ADEC or near-by borough/community brownfield inventories
- Interviews of federal agencies (BIA, USGS, BLM, etc.)
- Interviews with elders



Manokotak Elders identify Brownfield sites in 2009



Sources of Brownfield Info.

- Interviews of former workers and maintenance staff of potential brownfields buildings to obtain historical and maintenance information on specific sites.
- Reports from community members (verbal, web site, report form)
- Use of tribal GIS and mapping records.
- Hiring a contractor to conduct the inventory.



Brownfield Inventory Format

Your Choice:

- Simple List or Spread Sheet
- Detailed Checklist
- Your Own Database
- Other Database
- KSU Brownfield Inventory Tool (BIT)

Basic Inventory List

Site No.	Name	Location	Description	Owner/ Leasee	Land Status
1	Dead Moose Dump	East of Village Lat/Long	Old Community Dump Site	Village	Trust
2	Former D.M. High School	Main St. Red Bluff Lat/Long	Abandoned School House	Village Corp. (former BIA)	Private owners
3	Dead Moose Airport	Road 1 Lat/Long	Closed Aircraft Repair/Fuel Bldg.	Leasee Abandoned site	Not clear
4	Black Creek Dump Site	Dirt road off BIA 2 Lat/Long	Recent Open Dumping Site	Unknown	Fed. Land?
5	White Alice Site COB#5	North of Village	FUD Site	US Air Force	Fed. Land
6	Burned House #1	South Side No. 24	Burned House	Village member	Village Corp.

Detailed Site Inventory Checklist

(Based upon Phase I Checklist)

(TRIBE) Environmental Department Brownfields & Tribal Response Program Site Inventory Information Sheet	
Date: Updated:	Site Name
Form completed by:	
Directions to site:	
Site Description:	
Address: (county/state):	
Lat/Long:	
Township/Range/Section:	
Parcel/Allotment Number(s):	
Current Property Status/Owner: Tribal <input type="checkbox"/> Trust <input type="checkbox"/> Fee <input type="checkbox"/> Federal <input type="checkbox"/> Other <input type="checkbox"/>	
Current Use of Property:	
Future Use of Property:	
Neighborhood: <input type="checkbox"/> Residential <input type="checkbox"/> Industrial <input type="checkbox"/> Rural <input type="checkbox"/> Other	
Site & Vicinity general characteristics: (terrain, elevation, general land use in area, vegetation, location to nearest town)	
Physical setting:	
Geologic Information: -geological formations/thickness -bedrock name/depth -faults/structural features -(within 4 miles)	
Hydraulic Information: -depth to groundwater -aquifers under site -hydraulic conductivity -confined/unconfined -recharge area -interconnections	
Hydrology: -surface water flow direction -annual mean discharge rate of surface water -drainage area up-gradient of site -floodplain information -wetlands or water bodies	
Historical Information:	
Property use Past/Present:	
Previous owner:	
Potential environmental threats:	



Consider using the:
Brownfield Inventory Tool (BIT)
{available on-line or a PC version}
Kansas State University
Technical Assistance to Brownfields
(TAB)

<http://tab-bit.org/>



Brownfield Inventory Tools

YRITWC: developing a database

KSU TAB: <http://tab-bit.org/>



Tribal Accomplishments

- Sites inventoried and some on web sites
- More input on past sites from elders and community members



Tribal Issues

- Site ownership, status & history unclear
- Jurisdiction not clear
- Party with current responsibility not clear



The End