

**The Office of Air Quality Planning and Standards**

**Tribal Program Plan**

**2008 – 2013**



**May 15, 2008**

# TABLE OF CONTENTS

I. Program Plan Overview.....	page 3
A. Plan Purpose	
B. Background	
C. Tribal Program Development	
▪ Office of Air and Radiation (OAR) Tribal Program	
▪ Office of Air Quality Planning and Standards (OAQPS) Tribal Program	
▪ Office of Air Quality Planning and Standards (OAQPS) Discussions with Tribes	
II. Tribal Priorities.....	page 5
1. Effective Communication and Relationships	
2. Technical Support	
3. Collaboration	
4. Air Quality Pollution and Impacts to Health and Environment	
5. Regulatory Issues	
6. Ecosystem Approaches	
7. Sovereignty	
8. Air Toxics	
III. OAQPS Program Priorities and Activities.....	page 10
1. Effective Communication and Relationships	
2. Technical Support	
3. Collaboration	
4. Air Quality Pollution and Impacts to Health and Environment	
5. Regulatory Issues	
6. Ecosystem Approaches	
7. Sovereignty	
8. Air Toxics	
IV. OAQPS Action Plan.....	page 14
V. OAQPS Tribal Representatives.....	page 17

## **I. PROGRAM PLAN OVERVIEW**

### **A. PLAN PURPOSE**

This Tribal program plan reflects on the priorities of the Office of Air and Radiation (OAR), the Office of Air Quality Planning and Standards (OAQPS), and the needs and priorities as expressed by many of the Tribes. This plan will discuss OAQPS' Tribal mission statement, objectives, and specific activities that OAQPS will conduct to meet those objectives. This plan will be updated on a bi-annual basis.

### **B. BACKGROUND**

The 1990 Clean Air Act, Section 301(d) stipulates EPA's obligation to treat Tribes in "a manner similar to a State" and in some cases to implement programs on behalf of Tribes. Many treaties were established between the federal government and individual Tribes to indicate the federal government's trust responsibility to protect the interests of Tribes. In 1998, the Tribal Authority Rule (TAR) was promulgated, which gives Tribes the authority and flexibility to implement programs that meet programmatic and environmental management goals.

With the 1990 Clean Air Act Amendments and the Tribal Authority Rule in place, the number of Tribal air quality programs began to increase in the 1990's across the United States. While Tribes have only begun to touch the surface in terms of addressing air quality issues, there has been tremendous progress in capacity-building and establishing a presence for participation in regulatory, policy and technical decisions related to air quality.

### **C. TRIBAL PROGRAM DEVELOPMENT**

#### **Office of Air and Radiation (OAR) Tribal Program**

The performance measures and objectives discussed in this document derive from the OAR Tribal Program Plan titled "*Protecting Public Health and Air Quality Resources in Indian Country. A Plan for EPA/Tribal Partnerships 2008-2013.*" The OAR plan consists of a total of six goals that EPA will achieve or address over the next five years. These goals were developed around objectives derived from target language used in EPA's Strategic Plan. The OAQPS program plan is developed around these six goals, particularly goals 2, 3, 4, and 6.

**Goal 1: Provide financial and technical support to Tribes, with assistance from the Regions, to assess their air quality (and potential health concerns) within their jurisdiction.**

Objective: By 2011, with EPA support, 30 additional Tribes (six per year) will have completed air quality emission inventories. (*EPA Strategic Plan - Goal 1, Objective 1.1*)

**Goal 2: Build Tribal capacity to implement air quality programs.**

Objective: By 2011, 18 additional Tribes will possess the expertise and ability to implement the Clean Air Act in Indian country (as demonstrated by successful completion of an eligibility determination under the Tribal Authority Rule).  
(EPA Strategic Plan - Goal 1, Objective 1.1)

**Goal 3: Support a wide variety of training activities, outreach and detailed technical support.**

**Goal 4: Ensure that the appropriate mechanisms and tools exist to address regulatory and non-regulatory program needs in Indian country.**

**Goal 5: Develop and implement the use of voluntary programs to address the specific needs of Tribes in areas such as indoor air quality outreach, mobile source emissions and exposure to ultraviolet (UV) radiation.**

**Goal 6: Improve government-to-government relationships with federally recognized Tribes.**

In addition, the OAR Tribal Program, of which OAQPS is a part, is committed to providing the national support that is important for successful program outcomes. This commitment includes:

1. Providing appropriate tools, including training and guidance documents, for implementing Tribal air programs,
2. Continuing National Air Program management support and involvement at the highest levels of both Headquarters and Regional Offices, and
3. Identifying and focusing resources to meet the commitments of the OAR Tribal Program Plan.

**Office of Air Quality Planning & Standards (OAQPS) Tribal Program**

OAQPS has entered into its seventh year of supporting Tribal programs. What began as a voluntary effort by one staff person in 1998 has grown into a formal program, with the formation of a cross-divisional OAQPS Tribal Team, which seeks to engage with Tribes on various air quality issues. In June 2005, the OAQPS made a formal decision to reorganize so more innovative approaches to addressing reductions in pollution and protection of human health and environment could occur.

The current OAQPS Tribal Program mission statement includes:

**Ensure Tribal issues are incorporated into OAQPS programs to strengthen EPA and Tribal air quality programs in Indian country and build infrastructure and capacity.**

This mission is to be accomplished in OAQPS by:

- Recognizing the special considerations affecting the development of air quality programs in Indian country
- Providing advice, training, and support to OAQPS staff and management
- Coordinating Tribal air quality training for EPA and Tribal employees
- Working in partnership with Tribes, stakeholders, and other EPA offices to improve air quality in Indian country.

### **OAQPS Discussions with the Tribes**

In 2005 and early 2006, the OAQPS Tribal Program held three meetings with Tribal environmental professionals and national Tribal organizations on several topics including the best placement within OAQPS for the Tribal Program, Tribal priorities for addressing air quality issues, and ideas on how OAQPS could provide support to Tribes across the U.S.

The development of this OAQPS Tribal Program plan relies heavily on feedback provided by the Tribes, the new direction that OAQPS has established as a result of its reorganization, and new approaches to addressing air quality issues across the U.S.

## **II. TRIBAL PRIORITIES**

Below are the priorities established by participating Tribes and national Tribal organizations as expressed during the 2005 and 2006 discussions. (Please note that OAQPS' response to Tribal priorities is discussed at length under section III.):

### ***1. Effective Communications and Relationships***

Tribes commented most on the need for OAQPS to help develop effective communications and relationships between the Tribes and EPA.

#### **Information Dissemination**

Tribes recommended that OAQPS play a role in facilitating collaboration efforts between EPA agencies and sister federal agencies such as the Bureau of Indian Affairs (BIA), Department of Energy (DOE), and Indian Health Services (IHS). They saw many opportunities that could serve the interests of Tribes including access to information, rules, guidance, funding and technical support. But they also cautioned that it would be better to consolidate the information sharing by establishing one website with links to the other agencies. They said to keep using forums such as the National Tribal Forum (NTF), Pacific Northwest Tribal Air Network (PNTAN), Inter-Tribal Environmental Council (ITEC), Inter-Tribal Council of Arizona (ITCA), and others for outreach, technical assistance and capacity-building. They conveyed that communication efforts with national organizations such as the National Tribal Air Association (NTAA) needed to be improved so that information could be conveyed consistently.

## Participation

Tribes said they wanted to become more involved with efforts that are pertinent to them such as the National Monitoring Strategy, NCore network participation, on- and off-reservation permitting, rule development, and policy decision-making, which are efforts led by OAQPS. They also indicated that they want to be fully integrated into the participatory process and to be notified early about regulations and policy that have the potential to effect their lands and programs. Some recommended that OAQPS staff should have a more visible presence in Indian Country and to meet more regularly with Tribal representatives. They also recommended that OAQPS work to provide an avenue for full Tribal participation in all OAQPS activities.

## Mutual Understanding

Another common theme from the feedback was mutual understanding of both Tribes and EPA structures. One comment indicated that it would help if EPA coordinated and researched information that it provides prior to contacting Tribes. There were also comments that essentially said that learning could go both ways; that Tribes had a lot to offer in terms of creating understanding and that it would help to be informed about government culture.

There were several comments related to regional consistency and that EPA headquarters, OAQPS and the regions needed to be more cognizant of what each other was doing.

## Listen

Tribes indicated that they are not given the opportunity to provide input on decisions that are made by EPA that have the potential to impact their programs. They said it is imperative to solicit broad perspectives and to involve them early in the process, especially for issues such as rules, regulations, policies, and technical topics, such as monitoring. While Tribal trust responsibility is acknowledged, it is not used to its fullest capacity in working with Tribes.

Tribes recognize that they have a unique relationship with the federal government and they feel it is important to note that they do not fit a traditional paradigm and their needs will most often fall out of EPA's view of national strategies and scopes. This however, should not preclude their full participation or limit their ability to ensure that their needs and issues will be addressed adequately. They conveyed that it is important to continue building Tribal capacity and build support for continued air quality funding. Another important point was that creating a "survival of the fittest" atmosphere is not going to benefit Tribes and they do not want to compete with each other for funding and support.

## What Works

The Tribes also asked OAQPS to continue to present success stories of Tribes and to continue developing tools and software, such as Tribal Emissions Inventory Support

System (TEISS) work, improving the collaborative process with the New Source Review rule, working with Tribes to include success stories in the Tribe-to-Tribe section of the Tribal website, development of monitoring for the Tribes, Turbo Quality Assurance Program Plan, and working with the Tribal Air Monitoring Support Center (TAMS) to develop the Tribal data toolkit.

## **2. *Technical Support***

OAQPS has always served as a research and technology center for the development of regulations, policy, and methods for air quality measurements and compliance. Tribes recognize that OAQPS has a wealth of knowledge and experience in air quality topics and made comments on how to build a relationship that enhances technology transfer and capacity-building on Tribal lands.

### Models, Templates, Guidance Documents

Most of the comments regarding technical support were related to the regulatory aspects of air quality. Tribes said developing templates or models for addressing source emissions and control strategies would streamline the process. Models and templates would include those for rules, codes and ordinances. They also indicated that it would be helpful to develop guidance documents for drafting Tribal-specific regulations, implementation plans, and permit writing as Tribes go through each of the different processes.

### Data Management

As Tribes continue to assess air quality within their Tribal boundaries, they are often faced with numerous obstacles that hinder their ability to conduct adequate data management activities. Data management in this case includes the downloading of data from the air monitoring devices, storage, interpretation, analysis and submittal to various EPA national databases. Tribes said they would like to see more technical support in this area. Some indicated that classroom training was helpful, but they are seeking additional one-on-one support to build a good data management system. They also indicated that national mapping and analysis did not adequately capture local and regional concerns and that they would like to build on opportunities such as mapping, submitting and sharing data to fill some of the data gaps that currently exist. They also mentioned that they are especially concerned with localized issues that may impact or detrimentally influence the health of their Tribal community members. And while this is different from using data for regulatory or compliance purposes, it is another example of how Tribal air quality management is unique, yet equally important.

### General

There were a few additional comments related to technical support including the need for audits (Performance Evaluation Program, National Performance Audit Program, independent audits, etc.) for monitoring systems, more avenues for identifying sources,

continued support for emissions inventory development, and indoor air quality management plans.

### ***3. Collaboration***

While recognizing that each Tribe has its own sovereignty status, and some relationships with neighboring states and even Tribes are possible, there were some Tribes who conveyed they wanted to see more opportunities for collaboration. Since limited funding and personnel has hindered the progress of many air quality programs, Tribes recommended continued efforts to partner with others and expand communication efforts.

Tribes said joint collaborations have been successful and named the Joint Air Toxics Assessment Project (JATAP) and the Tribal Environmental Exchange (TRES) network as examples. They also said to consider the establishment of roundtable discussions with other agencies, if this hasn't already occurred.

### ***4. Air Quality Pollution and Impacts to Health and Environment***

Another area of critical importance to Tribes is continued evaluation of air quality within Tribal boundaries and taking the next step to correlate that information with impacts to human health and the environment. Recognizing that this is a very complex task that will require planning, commitment and appropriate funding, Tribes offered several comments to consider for this effort.

The majority of comments pointed to the fact that the size of Tribal boundaries and population do not meet the requirements for most health studies. They argue that it is still important to consider localized or regional approaches because Tribes are disproportionately affected due to many factors. The protection of health is important to Tribes and they feel it is critical to assess air quality to determine the potential impact to community members and the surrounding ecosystem. They would like OAQPS to facilitate discussion in this area and to identify potential collaborators such as the Centers for Disease Control (CDC), Bureau of Indian Affairs (BIA), and Indian Health Service (IHS).

Other suggestions included the development of a comprehensive health assessment to identify current data gaps and to develop Tribal specific health risk attributes for local or modular approaches.

Some Tribes reiterated that Tribal cultural beliefs had a lot to offer in terms of educating mainstream society about environmental protection. They said that EPA should be willing to learn from Tribes' experiences. They also expressed that EPA needed to support ecosystem and climate change discussions. A number of Tribes still practice subsistence lifestyles and utilize plants and other natural resources for traditional purposes. And lastly, some Tribes indicated that they may have one source of pollution, such as wood smoke, but it was still justified a need to address these concerns for the protection of health of its community members.



## **5. *Regulatory Issues***

Many Tribes commented that the current system for EPA rules and policy development excludes the participation of Tribes even when those same rules and policy have a direct impact on Tribal boundaries and sovereignty. Many Tribes said it is critical to include Tribes early and often in the discussions regarding rules and policy that effect them. The particulate matter rule was used as one example in which Tribes were not informed early enough, but still managed to respond via comment letters and public meetings with EPA staff. They said however, that the consultation policy is not used to its maximum capacity.

Another recommendation was to streamline the process for obtaining “treatment in a similar manner as a state” status. Other comments included the need for EPA to recognize that smaller (minor) sources have a cumulative effect on emissions and to serve as a facilitator for Tribes to influence input and decision-making regarding off-reservation sources.

## **6. *Ecosystem Approaches***

Many Tribes across the U.S. have said for many years that they would like to see an integrated approach to environmental protection that encompasses the ecosystem as a whole. Historically, EPA has always separated the components of an ecosystem into various media including air, water, solid waste, indoor air. Tribes on the other hand, see the interaction with various media as a way of life – we cannot have one without the other and it is important to sustain a balance for present and future generations. Many Tribes are concerned with mercury deposition, acid rain, cumulative impacts on fish and animals, and pesticides, to name a few.

Tribes saw the OAQPS reorganization as opportunity to begin looking at various approaches that impact them directly and may have applications across the U.S. Specifically, Tribes have an interest in looking at air air/water interactions, multi-media issues and ecosystem approaches. Tribes are encouraged that OAQPS sees ecosystem and multi-pollutant approaches as an important concept for evaluation and implementation. They suggested many ideas for how to initiate projects and studies.

They said it was important to seek participation and cooperation from the internal groups that exist within OAQPS, and then to gain support from external entities as well. They also said it was important to incorporate all of the existing standards and regulations. As it is now, they found problems with trying to get agencies to work together and that it would be important to go beyond those obstacles for a concerted effort to address ecosystem concerns.

They also said that it would be advantageous to participate in meetings of the Tribal Science Council and the EPA Tribal Water Program Council.

## ***7. Sovereignty***

Tribes were greatly concerned with the lack of recognition by EPA that Tribes have a unique relationship with the federal government. They commented that it was important to recognize the sovereignty status of individual Tribes and as such, treat Tribes as governments and not stakeholders. They wanted to clarify that each Tribe is different and offers diverse perspectives, and they still have environmental concerns that require attention and participation.

## ***8. Air Toxics***

While there tends to be more of a focus on criteria pollutants, some Tribes indicated that they have serious issues related to air toxics that they would like to address. They felt that it was important to provide funding avenues for air toxics monitoring and also include air/water interface issues. There were a number of concerns about fossil fuels such as oil, natural gas, and coal, in regard with the advent of the Energy Policy Act. Some Tribes fear that not enough is being done to address air toxics emissions such as mercury, cadmium and dioxins from these sources.

### **III. OAQPS PROGRAM PRIORITIES and ACTIVITIES**

The OAQPS Tribal Program established a record of the priorities, comments, and feedback that it received from the Tribal air professionals and responded by listing current activities at OAQPS that endeavor to meet the needs of Tribes. While the Tribal Program has been active in responding to Tribes, OAQPS recognizes that more can be done to augment its delivery of support to Tribes.

#### ***1. Effective Communication and Relationships***

In response to Information Dissemination, OAQPS is active in or will develop the following activities:

- Participate in the monthly EPA Regional Air Coordinators call to provide updates on internal activities and to find out what is happening at the regional level
- Coordinate with the National Tribal Air Association (NTAA) to provide the latest information on rules, regulations, policies, technology information, training, and other activities
- Coordinate with the Office of Air and Radiation (OAR) to post up-to-date information on the Tribal air website for public viewing
- Develop and distribute a Tribal air newsletter on a quarterly basis
- Establish a memorandum of understanding (MOU) with the Department of Health and Human Services (DHHS) and the Centers for Disease Control (CDC) to coordinate Tribal and community-related approaches to reducing air toxics.

In response to Participation:

- An OAQPS Tribal Team, which is composed of staff members who represent the five divisions of OAQPS, will meet regularly to provide updates on activities pertinent to Tribal air quality management
- The OAQPS Tribal Program will work with rule writers and program leads to ensure perspectives that represent Tribes' concerns and activities are conveyed
- Participate in national Tribal conferences/forums/meetings, and become an ex-officio member of the TAMS Steering Committee
- The OAQPS Tribal Program will host a conference at RTP, NC for Tribal air quality professionals to meet with OAQPS management and staff on an annual basis
- OAQPS staff will continue to serve as co-instructors at the Institute for Tribal Environmental Professionals (ITEP) training courses
- OAQPS established Tribal workgroups for Tribal New Source Review implementation and particulate matter designation and implementation
- Develop an OAQPS consultation/communication policy to help staff better work with Tribes

Tribal air professionals asked that EPA be an active listener when it comes to hearing their concerns regarding environmental issues and to inform them about rules, policy, technology and other topics that are pertinent to them. As a result, OAQPS is involved in the following activities:

- Monthly National Tribal Air Association (NTAA)/OAQPS calls
- Work group to finalize the Executive Order (EO) 13175 – Consultation and Coordination with Indian Tribal Governments – policy and guidance, as well as a separate policy for OAQPS
- Training to EPA staff to understand the government-to-government relationship trust responsibilities and cultural values of Tribes to support a more effective relationship

The OAQPS Tribal Program has been active about informing the environmental community about Tribal success stories and taking the initiative to highlight the efforts of Tribes using the following outreach tools:

- A quarterly Tribal Air Newsletter for Tribal agencies on a quarterly basis
- Tribal Air Website with recent stories and case studies
- Pursue other forums for highlighting effective Tribal programs

## ***2. Technical Support***

To address the availability of Models, Templates, and Guidance Documents:

- Continue the Tribe-to-Tribe section of the Tribal Air Website to include examples of models for writing various documents such as a Tribal Implementation Plans (TIPs) and examples of actions taken by Tribes to address environmental concerns
- Explore developing model codes and rules on key Tribal programs

To address and respond to Data Management training and technical support; OAQPS will:

- Collaborate with the Institute for Tribal Environmental Professionals (ITEP) and the EPA Regions to establish a comprehensive Air Quality System (AQS) strategy that will identify the various mechanisms for training and technical support for AQS data submittal
- Fund development of ITEP's Tribal Data Toolbox, ongoing training support for the Tribal Emission Inventory Software Solution (TEISS) for emission inventory development and the Turbo Quality Assurance Program Plan (Turbo QAPP) software program
- Fund specialized projects such as the multi-media modeling study with the Pleasant Point Passamaquoddy Tribe in Maine to incorporate the use of a software developed by Office of Research and Development
- Develop a Tribal database to better track Tribal program information

To continue to provide technical support to Tribes in areas such as monitoring, regulatory development and review, OAQPS has been active in drafting several documents to clarify the relationship between EPA's activities and Tribal priorities, through the following efforts:

- Develop and distribute a white paper on establishing an ambient air auditing program in Indian country for criteria pollutants. Tribes will be asked for their input and feedback on the best options for a Performance Evaluation Program (PEP) and National Performance Audit Program (NPAP), specifically for Tribal monitoring programs
- Develop a Tribal Air Monitoring Technical Resource document
- Create model letters for Tribal leaders requesting input on designations
- Develop guidance as needed in key areas of interest to support Tribal programs
- Establish a regular forum either through conference calls, meetings, or other avenues to get input from the Tribes on their needs/priorities

### ***3. Collaboration***

To enhance collaboration with Tribes, OAQPS will:

- Support, as much as possible, collaborations through technical support, Inter-Governmental Personnel Act (IPA) assignments, and/or other activities
- Develop and implement training for EPA regions and/or states on working effectively with Tribes

### ***4. Air Quality Pollution and Impacts to Health and Environment***

OAQPS has been active in ensuring that Tribes' perspectives are included. The following are some examples:

- Integrating Tribal boundaries in to the OAQPS data systems, which are often utilized to provide impact analysis for rule and regulatory development

- Collaborating with ITEP to increase the number of Tribes entering data into the national Air Quality System (AQS). This data will allow for better analysis of impacts to Tribal boundaries
- Creating a memorandum of understanding (MOU) with Department of Health and Human Services (DHHS)/Centers for Disease Control (CDC) to develop better health information for addressing Tribal issues
- Supporting pilot programs with some Tribes to develop guidance on conducting risk assessment, such as the Pleasant Point Passamaquoddy fish tissue survey and the Joint Air Toxics Assessment Project (JATAP)

## ***5. Regulatory Issues***

OAQPS recognizes that improvements can be made to inform Tribes in a timelier manner about rules, policy, guidance, technology and technical information. Efforts to improve communications will be made in the following areas:

- Increase Tribal participation in rule, policy and regulatory development by meeting regularly with OAQPS staff, cross-divisionally, and communicating more with rule writers
- Coordinate with the NTAA on the monthly calls to provide a forum for discussion, as well as using the Tribal Air Website and quarterly Tribal air newsletter to disseminate information
- Utilize information forums such as Web casts and Genesys to disseminate information

## ***6. Ecosystem Approaches***

Ecosystem and multi-media approaches are a priority for OAQPS:

- Increase Tribal program representation in the OAQPS Ecosystem committee to provide input on Tribal concerns and issues
- Continue development of guidance and tool development for Tribes who are conducting risk assessments
- Work with others in EPA such as the Office of Atmospheric Programs, to support a broader understanding of ecosystem protection to Tribes, by way of training and provision of tools.

## ***7. Sovereignty***

To heighten awareness of federally recognized Tribes' unique status as sovereign entities, OAQPS will:

- Collaborate with the EPA American Indian Environmental Office (AIEO) on the EO 13175 - Consultation and Coordination with Indian Tribal Governments
- Develop an "OAQPS Consulting with Indian Tribal Governments" Policy
- Develop and implement training entitled "Working Effectively with Tribal Governments" for EPA employees

- Continue to educate state and local agencies on Tribal sovereignty

### 8. Air Toxics

The OAQPS Tribal Program works actively with Tribes and local communities to implement solutions for air toxics reductions. Projects include:

- The Community for a Renewed Environment (CARE) annually funds proposals to Tribes, states, and nonprofit organizations for community projects
- Sustainable Skies Program
- Community-based Air Toxics Program

## IV. OAQPS ACTION PLAN

Below is a listing of current, ongoing, technical support/funding, and coordination activities performed in OAQPS to support the Tribal program. This plan will assist OAQPS in tracking its progress in meeting its overall Tribal commitments. Please note that this plan is a “living document” and will be updated accordingly and all activities are contingent on receipt of adequate funding.

ACTIVITY	DESCRIPTION	STATUS	CONTACT
<b>Current:</b>			
Establish memorandum of understanding (MOU) with DHHS and CDC	Currently establishing memorandum of understanding with Dept. of Health & Human Services and the Centers for Disease Control to coordinate health and community-related approaches to reducing air toxics	Signed July 2007 Being implemented	Holly Wilson, OID
Develop an OAQPS policy on Consulting with Tribes	Consulting/communication policy to help OAQPS staff better work with Tribes and determine if there are Tribal implications.	Draft currently out for comment. Complete policy by Spring 2008	Yvonne W. Johnson, OID
Establish Tribal workgroups for Tribal New Source Review implementation	Establish workgroups to assist Tribes in implementation of the Tribal New Source Review Rule	Meeting Monthly	Laura McKelvey, OID
Host a Tribal Air Quality Professionals Meeting in RTP	Host a meeting, annually when possible, for Tribal air quality professionals to meet with OAQPS management and staff	Possibly 2008	Laura McKelvey, OID
Develop a Tribal database	Developing a Tribal database to better track Tribal program information.	Currently under development target fall 2008	Tami Laplante, OID

<b>ACTIVITY</b>	<b>DESCRIPTION</b>	<b>STATUS</b>	<b>CONTACT</b>
White paper on establishing an ambient air auditing program in Indian country	Tribes will be asked for input and feedback on the best options for a Performance Evaluation Program (PEP) and National Performance Audit Program (NPAP), specifically for Tribal monitoring programs.	Draft distributed to the Tribes for comment	Mike Papp, AQAD
Develop Tribal Air Monitoring Technical Resource document	A Tribal Air Monitoring Technical Resource document is being developed between the Tribes and EPA	Completed Fall 07	Mike Papp, AQAD
Develop model letters on designations	Development of model letters for Tribal letters requesting input on designations.	PM model letters have been distributed to Tribes	AQPD
“Working Effectively with Tribal Governments” Training	Training for OAQPS to help staff better understand govt-to-govt relationships, trust responsibilities, and cultural values of Tribes to support a more effective relationship.	Conducted November 2007	Lena Epps-Price, OID
<b>On-going:</b>			
Tribal Air News Newsletter	Covering Tribal program news for all OAR offices and the Tribes. Provides an overview of current projects, training, and opportunities to participate in programmatic activities. Posted quarterly on the Tribal Air Website.	Newsletters are prepared on a quarterly basis.	Melissa McCullough, OID
Tribal Air Website	Located at <a href="http://www.epa.gov/oar/tribal">http://www.epa.gov/oar/tribal</a> . Compilation of information, articles, and newsletters to help keep the Tribes informed.	Updated as appropriate.	Tami Laplante and Rick Copland, OID
Monthly EPA Regional Air Coordinators call	Call to provide updates on internal activities and to find out what is happening at the regional level.	Calls are held monthly.	Ida McDonnelly, R3 and Tami Laplante, OID
OAQPS Tribal Team	Composed of staff members from the five OAQPS divisions, meets regularly to provide updates on activities and discuss issues.	Meet monthly.	Tami Laplante, OID
Participate in national Tribal conferences, forums, and meetings	Participate and present materials as needed.	Participate as needed.	OID/CTPG
Ex-officio member of the TAMS Steering Committee	Participate on TAMS Steering Committee as ex-officio member	Monthly calls. Bi-annual meeting.	Laura McKelvey, OID
Monthly National Tribal Air Association/OAQPS call	Forum for discussion on various regulations, policies, and/or issues affecting Tribes.	Calls are held monthly.	Tami Laplante, OID

<b>ACTIVITY</b>	<b>DESCRIPTION</b>	<b>STATUS</b>	<b>CONTACT</b>
Participate in Agency's workgroup to finalize EPA's policy for implementing EO 13175	Participate in a workgroup to finalize Agency's policy for implementing the Executive Order 13175 – Consultation and Coordination with Indian Tribal Governments – policy and guidance.	Agency policy currently under development	Laura McKelvey, OID
Establish Tribal workgroup meetings as needed for national development of the NAAQS	Give tribes the opportunity to participate in policy and rule development in new NAAQS standards.	Tribes so far have not indicated an interest in regular workgroup meetings for the 24 hour PM2.5 designations	Tom Link, AQPD
Develop handbook for tribes on how to develop their own specialized projects.	Develop handbook for tribes on how to develop their own specialized projects such as fish and tissue studies.	Currently under development. Complete by end of 2008.	Christine Davis, HEID
<b>Technical Support/Funding:</b>			
Funding and technical support for Development of ITEP's Tribal Data Toolbox	OAQPS provided funding for the development of ITEP's Tribal Data Toolbox, ongoing training support for the Tribal Emission Inventory Software Solution (TEISS) for emission inventory development, and the Turbo Quality Assurance Program Plan (QAPP).	Under development. Need to complete support training.	Mike Papp, AQAD
Wood-stove change-out campaign	OAQPS provided partial funding for a woodstove change-out campaign and ambient/indoor air study at the Nez Perce Tribe in Idaho and other areas	Campaign is on-going	Amanda Aldridge, OID
Funding of CARE projects	The Community for a Renewed Environment (CARE) annually funds proposals to Tribes, states, and nonprofit organizations for community projects.	OAQPS supports outreach to the Tribes. CARE distributes grants to the Tribes.	Holly Wilson, OID
<b>Coordination:</b>			
Coordinate with NTAA	Provide the latest information on regulations, policies, technology information, training, etc.	Coordination on-going	OID/CTPG
Serve as co-instructors at ITEP	Staff will serve as co-instructors at the Institute for Tribal Environmental Professionals (ITEP) training courses	As needed basis	OID/CTPG



<b>ACTIVITY</b>	<b>DESCRIPTION</b>	<b>STATUS</b>	<b>CONTACT</b>
Collaboration between EPA and ITEP to increase data in Air Quality System	Collaboration between EPA and ITEP to increase the number of Tribes entering data into the national Air Quality System (AQS). Data from AQS will allow for better analysis of impacts to Tribal boundaries.	As needed basis	Ed Lillis, OID
Collaboration between Tribal program representatives and OAQPS Ecosystem committee	To provide input on Tribal concerns and issues, OAQPS Ecosystem Committee will collaborate with Tribal representatives.	As needed basis	Christine Davis, HEID
<b>Long-term:</b>			
Develop and implement training for EPA regions and/or states	OAQPS will develop and implement training for EPA regions and/or states on working effectively with Tribes	On-going effort. Currently, working to develop SIP training.	Laura McKelvey, OID
Support pilot programs with some Tribes to develop guidance on conducting risk assessment	Could include Pleasant Point Passamaquoddy fish tissue study, Joint Air Toxics Assessment Project (JATAP), and others	Passamaquoddy on-going; JATAP on-going; Others as funding is available	Laura McKelvey, OID

## V. OAQPS Tribal Representatives

Each division in OAQPS has at least one Tribal representative. Should you have any questions regarding this plan or would like to provide information to update the activity plan, please contact your division representative as noted below:

### Office of Air Quality Planning and Standards, overall representative

Laura McKelvey  
919-541-5497  
[mckelvey.laura@epa.gov](mailto:mckelvey.laura@epa.gov)

### Air Quality Assessment Division

Mike Papp  
919-541-2408  
[papp.michael@epa.gov](mailto:papp.michael@epa.gov)

### Air Quality Policy Division

Tom Link  
919-541-5456  
[link.tom@epa.gov](mailto:link.tom@epa.gov)

Jessica Montanez  
919-541-3407  
[montanez.jessica@epa.gov](mailto:montanez.jessica@epa.gov)

### Health and Environmental Impacts Division

Christine Davis  
919-541-1565  
[davis.christine@epa.gov](mailto:davis.christine@epa.gov)

### Outreach and Information Division

Lena «Vickey» Epps-Price  
919-541-5573  
[epps-price.lena@epa.gov](mailto:epps-price.lena@epa.gov)

Yvonne W. Johnson  
919-541-3921  
[johnson.yvonnew@epa.gov](mailto:johnson.yvonnew@epa.gov)

Tami Laplante  
919-541-1915  
[laplante.tami@epa.gov](mailto:laplante.tami@epa.gov)

Nancy Mayer  
919-541-5390  
[mayer.nancy@epa.gov](mailto:mayer.nancy@epa.gov)

Melissa McCullough  
919-541-5646  
[mccullough.melissa@epa.gov](mailto:mccullough.melissa@epa.gov)

### Sector Policies and Programs Division

Charlene Spells  
919-541-5255  
[spells.charlene@epa.gov](mailto:spells.charlene@epa.gov)

