

U.S. Environmental Protection Agency, Region 9

Guidelines for Tribal Air Funding

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EPA Region 9 has two types of funding that tribes can apply for to conduct air activities: the General Assistance Program (**GAP**) and the Clean Air Act (**CAA**) §103.

CAA funds are typically used after a baseline assessment of air quality (including an inventory of existing air emissions) is completed. CAA funds are then used for air program implementation, if the tribe determines that there is an air pollution problem.

Funding air project activities under 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. Some typical air assessment activities are listed below.

- *Training* - May include, but is not limited to, workshops available through the Northern Arizona University's Institute for Tribal Environmental Professionals (ITEP), the Tribal Air Monitoring Support (TAMS) Center, California Air Resources Board (CARB), EPA, and others. Networking between tribes, states, counties and educational facilities could be an additional component of this training.
- *Develop an Emissions Inventory* - Calculate emissions of air pollutants from sources within tribal jurisdiction (individual small and large sources, emissions from cars, etc.), in order to estimate impacts on reservation air quality and assess the need for air pollution control regulations.
- *Air program needs assessment* - After basic air pollution training is completed, determine the extent of air pollution issues on the reservation and develop an assessment of the need for a longer-term tribal air program.
- *Acquisition of existing air quality data from neighboring jurisdictions* - Local air pollution control districts may have air quality monitoring data helpful to the tribe in assessing reservation air quality.
- *Investigate impacts of neighboring sources on tribal air quality* - Acquire emission data from air quality permits and compliance data from permitting agencies for nearby sources impacting reservation air quality.
- *Participate in regional initiatives* - such as the Regional Tribal Operations Committee (RTOC), the Western Regional Air Partnership (WRAP), the National Tribal Air Association (NTAA) or local coalitions.
- *Community outreach/education* - Provide information on air pollution issues to the local community, schools and tribal government through presentations, brochures, etc.
- *Develop a Draft Monitoring Plan* - Develop a plan for gathering baseline air quality data for the reservation.

- *Submit a CAA 103 Proposal* - If the tribe decides to pursue a long-term air program, work with EPA Region 9 to develop a CAA 103 air grant proposal.

Note: GAP funds cannot be used to fund **air monitoring activities** on a long term basis, as that would be considered “program implementation,” which is not the focus of GAP funding. Tribes that seek an ongoing air monitoring program, or other long term air quality work, are encouraged to pursue CAA §103 funding, or use other sources of funding to support implementation activities.

Air project activities that should be funded under the Clean Air Act

[Note: *Applying for funding under the CAA§103 is a process and is not guaranteed to all tribes.*]

- Developing an ongoing air monitoring program.
- Developing tribal codes and ordinances to regulate sources of air pollution.
- Developing air regulations (e.g. Treatment as State [TAS] and Tribal Implementation Plan [TIP]).
- Developing inspection and enforcement program.
- *All activities mentioned above under GAP are also allowable under CAA.*

How tribes can work together

As resources to fund air activities become increasingly limited under both GAP and the CAA, it is vital that tribes work together to leverage resources and share information with each other. Some ideas include:

- Exchange air quality data and emission inventories.
- Share the cost of training by consultants, when needed.
- Become trained to audit other tribes’ monitoring equipment.
- Join or develop local coalitions of tribes for support and to discuss issues.
- Share portable monitors, where feasible.