

DRAFT
June 10, 2005

Starting ideas for the Development Process and Content of a New Guidance Document/Strategy on Tribal Ambient Monitoring

Please review first by topic areas. These may need to be grouped and ordered differently.

1. **Timing** – It would be ideal if the draft document were available for presentation and discussion at the October 2005 annual meeting of the National Tribal Air Association.
2. **Overarching principles for tribal air monitoring**
 - a. Tribes have the right to monitor whatever they choose on tribal land, but EPA has limited resources to help pay for that monitoring.
 - b. EPA has a trustee role with respect to tribes and should act in their best interests where possible.
 - c. Consultation needs to be early and continuous, including during the development of this guidance/strategy
 - d. There needs to be consistency/fairness across tribes, but also flexibility to hear and if appropriate to address unusual or unexpected tribe-specific situations
 - e. Decisions affecting specific tribes should be made at a level where individual situations can be appreciated
 - f. Monitors off tribal lands may help meet the data needs of tribes, and monitors on tribal lands may help meet the data needs of others.
 - g. Consideration needs to be given to informing exposed persons about the level of their exposure.
 - h. Monitoring should always be for the purposes of characterizing specific known or suspected short term and/or long term risks to environmental values that depend on air quality, including
 - i. Human health risks
 - ii. Ecological risks
 - iii. Cultural values
 - i. Tribes should have equal opportunity to access programs not inherently tied to state/tribe distinctions where such access is consistent with program goals. E.g., CASTNet (which is funded by EPA funds separate from the state and tribal grant funds) is intended to monitor acid deposition across broad areas for the purposes of broad national objectives, so tribal lands in the right neighborhood should be considered equally with state and federal lands.
 - j. Grant procedures and grant performance must comply with applicable laws and regulations
 - k. EPA will work with tribes to ensure that there is timely public access to data collected with federal funds. EPA will need to explain the significance and need for this access. EPA should help tribes understand the significance of their data quickly so tribes are never less aware than others of the data and its implications if any.
 - l. EPA needs to support tribal capacity building, for example, by helping to develop the capabilities of tribal staff rather than contractor staff.
 - m. There needs to be periodic re-evaluation of the need for and value of ongoing

- n. monitoring, for example on a three to five year cycle.
What else?

2. Purpose, audience, and scope of this document

- a. This document is not intended to address the question of the overall level of EPA support to tribal air quality management or to tribal monitoring in particular. However, the process of preparing this document may better inform both EPA and tribal staff regarding the sufficiency of available resources relative to needs and desires.
- b. This document may end up containing information and insights that will be useful to Regional Offices that must prioritize available funds for tribal air quality management including monitoring, but the goal is not to establish new criteria for funding decisions.
- c. To be used tribes in determining their need for monitoring and in preparing work plans and grant applications
- d. To be used by tribes which are going to conduct monitoring to begin understanding how to do it, other information and assistance resources, etc.
- e. To be used by tribes to help draw understanding from monitoring data.
- f. To be used by states and EPA in considering whether and how monitoring sites on tribal lands may serve state, regional, or national needs and vice versa.

3. Background on the larger context, for those not already familiar (this may be a short section consisting of thumbnail sketches and pointers to other documents for fuller descriptions)

- a. Budget constraints
- b. Relevant CAA and TAR provisions
- c. Other EPA processes and constraints
- d. The existing state/local/other monitoring networks and funding system
- e. The draft National Ambient Air Monitoring Strategy
- f. QA requirements
- g. Data systems for ambient air measurements (AQS, other)
- h. Availability of ITEP and TAMS support
- i. Availability and role of “benchmarks” for health and ecosystem effects
- j. National Emissions Inventory
- k. NATA
- l. Air quality modeling methods and tools, in particular how they may be able to give insight into air quality on tribal land when ambient monitoring is not available.
- m. Indoor air, mold
- n. New source Review and PSD and their relationship to monitoring needs
- o. 110(a)(2)(D) – the interstate transport provision that also applies to tribes
- p. January 27, 2005 Holmstead memo
- q. The GAP program

4. Background on ambient air quality issues that can or may exist on tribal lands and relevant types of ambient monitoring

- a. Problems
 - i. pollutants
 - ii. sources
 - iii. tribes as receptors for transport
 - iv. special issues, e.g., high intake of specific food types and sources that could be affected by air pollution
- b. Monitoring addressing those problems
 - i. Technologies for air monitoring and other types of related environmental monitoring
 - ii. costs
 - iii. laboratory requirements/options

5. The role of tribal monitoring in the national monitoring strategy

- a. Summary/clarification of just what the “national strategy” contains and its status/role
- b. Relationship between the national strategy and tribal monitoring

6. Description of current and recent tribal air monitoring activities

- a. Process/criteria used to initiate current monitoring
- b. Ambient concentration findings
- c. Implications for short term adjustments in monitoring
- d. Lessons learned that can help guide the future

7. Assessment of ambient air quality on tribal lands in the absence of air monitoring

- a. Using very nearby monitors that are off tribal lands (ozone, PM_{2.5}). Caveat that proximity does not always mean representativeness.
- b. Larger scale spatial interpolation of non-tribal monitoring data (ozone, PM_{2.5})
- c. Predicting concentrations using air quality models and estimates of emissions
 - i. Large scale (grid models)
 1. concept
 2. how to get it done
 3. already-available results
 - ii. Local scale (dispersion/plume models)
 1. concept
 2. how to get it done
 3. already-available results (NATA and others)
 - iii. Caveats
- d. Estimating upper/lower bounds on concentrations on tribal land based on analogy to non-tribal monitored settings. Tribal lands with similar source patterns as certain urban areas on state land can learn something from monitored concentrations in those urban areas.

8. Setting substantive criteria/priorities for new monitoring efforts, and for discontinuing

efforts

9. Procedures for getting consideration for EPA funding and other support

10. Understanding your own monitoring data

11. Getting your data into AQS for others to use

12. The importance of complementary programs (control requirements/permitting, emissions inventories/reporting, etc.)