

**OFFICE OF AIR & RADIATION (OAR)
2015 TRIBAL AGENDA**

The Office of Air and Radiation (OAR) recognizes the important role that tribes have historically played in environmental issues including air quality. Tribal citizens are often disproportionately affected by air pollution, while their governments play an increasingly valuable role in controlling and reducing pollution and its adverse health effects. OAR's national programs provide important air quality and health benefits to tribal communities while assisting the efforts of tribal governments. However, our obligations to support tribes in addressing air quality goals extend beyond these national efforts to include tribal specific priorities. OAR's annual tribal agenda reflects the specific actions we intend to take in 2015 to directly support tribes in our joint efforts to reduce the health impacts of air pollution and address the environmental challenges posed by climate change.

This document discusses planned activities by OAR headquarters offices — Office of Radiation and Indoor Air (ORIA); Office of Air Quality Planning and Standards (OAQPS); Office of Transportation and Air Quality (OTAQ) and Office of Atmospheric Programs (OAP) to support, expand and assist tribal implementation of air quality management and climate change activities nationwide in fiscal year (FY) 2015. Note that much of EPA's support for improved air quality and increased capacity for air quality protection on tribal lands comes through activities led by EPA's regional offices. OAR headquarters offices and the regions work together on many tribal issues, and the headquarters activities described below supplement, complement and support the regional efforts. OAR also includes an appendix to our annual Tribal Agenda to highlight the previous year's achievements (*see A-2 in the Appendix for the OAR 2014 Tribal Agenda*).

In 2015, OAR will continue to support development of tribal capacity to improve outdoor and indoor air quality, to address climate change and energy issues, and to implement the Clean Air Act (CAA) in Indian country. OAR will minimize budgetary impacts on this capacity building as much as possible. Tribes have made tremendous progress with air quality management, but there is still significant need for tribal air quality management programs and climate change plans to be developed, refined, and supported. OAR has a robust set of activities underway for 2015 to support tribal activities. These actions include four priority areas: 1) Training and Capacity Building; 2) Technical Support; 3) Rules and Policies; 4) Internal EPA Activities and Additional Programmatic Efforts.

1. TRAINING AND TRIBAL CAPACITY BUILDING

OAR recognizes the need for ongoing training and capacity building with our tribal partners. These opportunities are currently conveyed through our direct interactions with tribes and through the implementation of key grants, such as a cooperative agreement with Northern Arizona University's Institute for Tribal Environmental Professionals (ITEP) and ongoing efforts with the National Tribal Air Association (NTAA). The following are OAR's specific training and capacity building activities for 2015:

Ambient Air Quality and Toxics

- a. Provide informational webinars and conference calls on program and regulatory development and implementation to allow tribes the opportunity to participate in the rulemaking process.
- b. Provide tribal designations support through training, technical tools and air quality analyses to allow tribes to participate in the designations process. [OAQPS]
- c. Expand the areas of training and general permitting to assist tribes with implementation of the Tribal New Source Review (NSR) rule. [OAQPS]
- d. Provide guidance and trainings for program development (i.e., Tribal Implementation Plan (TIP) Guidance and specific training on NSR). [OAQPS]
- e. TAMS Center Trainings: the TAMS Center will conduct 5-6 classroom courses including:
 - 1) GIS application in Air Quality.
 - 2) Air Pollution Technology.
 - 3) Management of Air Quality Grants.

Indoor Air

- a. The TAMS Center will conduct a classroom/field hands-on IAQ Diagnostic Equipment training for tribal professionals.
- b. Through a cooperative agreement with the American Lung Association of the Upper Midwest, partner with at least 18 tribes in 12 states to build the capacity of 270 tribal home visitors, health, housing, and environmental professionals to assess and remediate asthma triggers.

Climate Change

- a. Strengthen technical capacity of tribal environmental professionals to address climate change and energy issues by providing online data, information, and resources on:
 - 1) Sources of greenhouse gas emissions (GHGs), including a tribal lands filter in EPA's Facility Level Information on GreenHouse Gases Tool (FLIGHT);
 - 2) How tribes can plan for and achieve GHG emissions reductions, including through renewable energy, energy efficiency, and related clean technologies;
 - 3) Climate change health impacts by helping to coordinate the U.S. Global Change Research Program's latest assessment report, which includes an indigenous peoples section; and
 - 4) Climate change adaptation planning, including regional information of particular interest to tribes where possible. [OAP]
- b. As part of the last year of a cooperative agreement with ITEP, continue to support tribal climate change adaptation planning training and capacity building through an Alaska Tribal Climate Change webinar, continued updates to online resources (including a tribal climate change adaptation planning toolkit), dissemination of a monthly newsletter, and outreach and

communications efforts at venues including the National Adaptation Forum and the Pacific Northwest Tribal Climate Change Network. [OAP]

- c. Begin scoping to incorporate information on climate change impacts on tribal communities into the *Climate Change Indicators in the United States*, a project to track and communicate information about long-term trends in observed climate change in the United States. [OAP]
- d. Develop a modular online training curriculum and webcast series for tribes on climate change adaptation. This curriculum will provide step-by-step guidance on conducting risk and vulnerability assessments, selecting priority actions, and developing funding and implementation strategies to help tribes build their resiliency to the impacts of climate change. [OAP]

2. TECHNICAL SUPPORT

OAR recognizes the need to provide direct technical support to our tribal partners to assist them in implementing effective air quality programs and projects through the following activities:

Ambient Air Quality and Toxics

- a. Support technical capacity building with tribes through technical support for training activities with ITEP, NTAA, policy calls, Tribal Air Newsletters and websites.
- b. Provide technical monitoring and inventory support with a focus on analyzing data, modeling and implementing existing information and technical tools. [OAQPS]
- c. Finalize and release resource documents for open burning programs, and agricultural, forestry, and silvicultural burning programs in Indian country. [OAQPS]
- d. Finalize and release the following resource documents: 1) Tribal Implementation Plan Resource Guide and the *Clean Air Act: Summary of Content for Applicability for TAS for Titles I, III, and V*. [OAQPS]
- e. Develop guidance on the use of modeling to support tribal air programs. [OAQPS]
- f. Provide guidance to support tribal understanding of common air pollution control strategies – equipment, measures and methods. [OAQPS]
- g. Support tribes in participating in the development of Regional Haze SIPs. [OAQPS]
- h. Continue discussion and outreach on the use of ambient air monitoring sensor applications. [OAQPS]
- i. Continue development and maintenance of the OAR Tribal System (OTS) database to track tribal program progress across the country. [OAQPS]
- j. Submit 2014 facility, point, nonpoint, onroad/nonroad and event emissions data. The submission window opens June 1, 2015 and closes January 15, 2016. [OAQPS]
- k. Assist tribes in submitting emissions data to develop 2014 National Emissions Inventory (NEI). The data are used for regulatory analysis, regulation input, NAAQS decision making, and TIP development, etc. [OAQPS]
- l. Electronic reporting: make the electronic state implementation plan (eSIP) system in CDX available to tribes that are submitting Tribal Implementation Plans (TIPs). [OAQPS]
- m. Expand technical support for the Diesel Emissions Reduction Act (DERA) program. DERA tribal staff will host a total of three tribal teleconferences on the availability of DERA FY 2015 National Funding Assistance Program Tribal Request for Proposals (RFP) grant opportunities. [OTAQ]
- n. Provide technical visits to at least two DERA tribal award projects. [OTAQ]

- o.** Continue to develop its standalone DERA Tribal RFP to streamline the competition process and address the unique tribal parameters that challenge DERA-eligible diesel reduction projects in Indian country. [OTAQ]
- p.** Participate and present on mobile sources issues and rules, as well as the FY 2015 DERA Tribal RFP at the 2015 National Tribal Forum in Battle Creek, Michigan in May 2015. [OTAQ]
- q.** Continue to support the operation of two CASTNET small-footprint tribal monitoring sites in partnership with the Kickapoo Tribe (KS) and the Red Lake Band of Chippewa (MN), and the installation and operation of a third site in partnership with the Confederated Tribes of the Umatilla Indian Reservation (OR) (scheduled for installation in spring 2015). These small-footprint monitoring sites provide a low cost, low maintenance method for tribes to become involved with the CASTNET monitoring program. [OAP]

Indoor Air

- a.** The TAMS Technology Specialist responds to technical requests varying from providing assistance in setting up an ambient air quality monitoring instrument to troubleshooting of instruments. All the responses are one on one based training at the tribal site. It is projected that between five to seven projects will be completed in FY 2015.
- b.** TAM continues to provide gravimetric analysis service to six tribes in support of ambient particulate monitoring programs. Analytical support is now provided through a contracted laboratory, with TAMS staff providing data validation and technical support. TAMS' commitment is to assure these six tribes are able to obtain three years of complete monitoring results.
- c.** The TAMS Center equipment manager oversees and manages the diverse inventory of ambient/indoor air monitoring equipment available for loan to tribes upon request. The equipment manager's responsibilities include maintaining an inventory of ready to use instruments/equipment that can be deployed to tribal sites as needed and coordinate development of Standard Operating Guidance (SOG) for various air monitoring instruments that are set aside exclusively to be loaned to the tribes. The equipment loan program assures that the instruments shipped to the tribes are in best working conditions, are calibrated and produce validated data in the field. Procedures have also been developed for tribal operators in the field to assure quality data collection/management.
- d.** (40) – Forty new and remodeled tribal homes were built with improved IAQ building standards upon the Spokane Tribal Nation. EPA's Tribal IAQ Healthy Housing Team collaborated with the Spokane Tribe at its housing authority to assist in the adoption WA states - Evergreen building codes and provide technical assistance to properly apply radon resistant new construction standards; and improved IAQ guidance.

Radiation

- a.** ORIA will continue to support tribes in addressing unique radiation problems, concerns and issues, as appropriate. ORIA will provide technical assistance, training, guidance, and/or presentations to tribal governments and communities. For example, in FY 14, ORIA helped to coordinate federal monitoring and reporting efforts (EPA, FDA, and NOAA) to help Alaska natives better understand potential Fukushima-related exposure and risk associated with traditional seafood based diet.

Climate Change

- a. Provide technical support for climate change mitigation-related activities. [OAP]
 - 1) Continue to support six tribal Climate Showcase Community (CSC) grant recipients through administration of the CSC Program. One tribe (Santa Ynez Band of Chumash Indians) continues to have an active grant. All six tribes will continue to receive access to CSC training opportunities and technical assistance as needed. [OAP]
 - 2) Promote use of the Tribal Greenhouse Gas Inventory Tool, a free resource developed to help tribes estimate greenhouse gas emissions on tribal lands and from tribal activities. [OAP]
 - 3) Engage with tribes on the Green Power Partnership (GPP) and Combined Heat and Power (CHP) Partnership and continue to provide technical assistance to three tribal partners - one for GPP and two for the CHP Partnership. [OAP]
 - 4) Engage tribes on the Clean Power Plan by providing tribes with training, technical resources, and guidance to participate in state plan development and if tribes have the resources, in tribal plan development.

3. RULES AND POLICIES

OAR recognizes the need to increase the opportunities for tribes to fully participate in the OAR rule and policy development process. This will help ensure that OAR rules address tribal concerns and will strengthen the tribal programs and the implementation of policy making efforts.

Specific Activities for 2015

- a. Present at tribal conference calls (including monthly NTAA air policy calls, National Tribal Caucus meetings, etc.), participate at tribal conferences (National Tribal Forum on Air Quality, Alaska Native Tribal Conference on Environmental Management, etc.) and hold informational meetings and conduct webinars on key rules to provide support for tribal participation for rulemaking actions. Presentations and webinars will be conducted as part of the rule development process to increase awareness and understanding; during the public comment period to enhance tribe's ability to provide meaningful input; and post proposal, to aid in implementation of final rules.
- b. Conduct outreach and offer, facilitate, and follow-up on government-to-government tribal consultations for OAR rulemakings, guidance documents and other actions.
- c. Reflect lessons learned when conducting outreach and consultation with tribal governments.

(See A-1 in the Appendix for a list of projected OAR outreach and consultation activities.)

4. INTERNAL EPA ACTIVITIES AND ADDITIONAL PROGRAMMATIC ACTIVITIES

OAR acknowledges that in order to strengthen our collaboration with tribal communities, every employee of OAR needs to have a working knowledge of how their work may impact tribal communities. Additionally, OAR managed grants will continue to help tribes strengthen their efforts to address air pollution. Finally, OAR will participate in various internal and external activities to expand overall communication and collaboration with tribal nations.

Specific Activities for 2015

- a. Increase OAR knowledge of tribal air quality programs and requirements through training efforts and internal teambuilding.
 - 1) Provide training opportunity for all OAR management and staff on “Working Effectively with Tribal Governments” using the online training located at <http://tribal.golearnportal.org/> or <http://intranet.epa.gov/aieo/training/tribal/EPA/mainmenu/launchPage.htm>.
 - 2) Provide additional training opportunities for OAR management and staff, including brown bag events with special tribal guest speakers, to enhance staff ability to work effectively with tribes and on tribal issues.
 - 3) Strengthen OAR’s internal tribal team with cross office representation.
 - 4) Continue to coordinate with EPA offices outside of OAR to fully implement the 2011 Consultation Policy.
- b. Create OAR policies to ensure integration of tribal programs in OAR activities and specifically tribal consultation efforts under EO 13175 and EPA’s developing implementation plan and policy.
 - 1) OTAQ will develop an OTAQ Tribal Plan which will outline the strategy and goals to improve communication efforts and strengthen working relationships between OTAQ and tribal communities. OTAQ will also host training sessions for its staff to help identify any potential tribal impacts OTAQ’s work may have on tribal governments and/or communities.
 - 2) Continue to implement the ORIA Tribal Strategy and Plan. In FY 2015, effort will be made to improve communication, participation in tribal meetings and events, and collaboration with NTAA through formation of an “Indoor Air Quality Working Group.”
 - 3) ORIA has initiated Collaboration with HUD, IHS, and other Federal Agencies focused on Healthy Tribal Homes (i.e., HUD-Office of Native American Programs and Office of Healthy Homes and Lead Control, HHS – Indian Health Service, DOI – Bureau of Indian Affairs Home Improvement Program). Goals of the collaboration are to improve the effectiveness of federal efforts and tribal access to resources for addressing healthy homes activities in tribal communities.
 - 4) Continue implementation of the OAQPS Tribal Air Strategy. This strategy continues to strengthen OAQPS’s engagement with tribes on various air quality issues and will ensure that tribal perspectives continue to be considered when proposing regulatory and other programmatic issues.
 - 5) Continue to develop an OAP Tribal Plan which will help guide and inform OAP’s work with tribes. In 2015, as part of the plan development process, OAP will continue to host listening sessions with tribes and conduct interviews with EPA staff in order to ensure that the final plan reflects tribal input and staff experience.
- c. Continue and expand, if possible, the use of Agency grant programs to increase tribal air quality and climate change efforts.
 - 1) OAR will manage national grants that ensure effective implementation of grants to support training and technical support, encourage tribal students to pursue careers in air quality management and, develop and enhance tribal participation in policy and regulatory development with the NTAA.
 - 2) Consult with tribes on modifying allocation factors for state and tribal air grant funds.

- 3) OAP will compete a new cooperative agreement in FY2015 to provide training and information resources to assist tribes in their efforts to address and communicate climate change risks to their lands, health, culture, and communities.
- d. Additional collaborations.**
- 1) Coordinate with NTAA and ITEP to support and assist with the annual National Tribal Forum (NTF) jointly.
 - 2) ORIA will support the TAMS Center's base operations to ensure the provision of top quality training and technical support. The TAMS Center will also upgrade IT capabilities to improve the capabilities of the Virgil Masayesva Tribal Training Center and ensure provision of top quality training.
 - 3) Pursue additional opportunities through Indian General Assistance Programs Funding.
 - 4) Collaborate and form partnerships with federal and private entities involved in tribal building projects. These collaborative partnerships will help develop clear and consistent policy and guidance on construction of buildings integrating features to promote good indoor air quality.
 - 5) Wood Stove Change out Campaign: Identify and reach out to key federal partners (e.g., HUD, HHS, HIS) and other organizations to determine level of interest and type of support they can provide in Indian country. [OAQPS]
- e. Maintain the OAR Tribal Air Website (www.epa.gov/oar/tribal) and the Tribal Air Newsletter to disseminate information to the tribes. [OAQPS]**
- f. Foster strong communications with tribes and assist them with building relationships with other federal, state and local agencies.**

APPENDIX

- 1. 2015 Projected Tribal Outreach & Consultation Activities**
- 2. OAR Tribal Highlights for 2014**
- 3. 2014 Tribal Outreach & Consultation Activities**

A-1. 2015 PROJECTED TRIBAL OUTREACH & CONSULTATION ACTIVITIES

Projected Outreach and Potential Consultation for Regulatory Actions and Policies

(Outreach activities include: webinars, informational meetings, tribal policy calls, teleconferences, policy and guidance documents.)

- ⇒ Addressing greenhouse gas emissions from aircraft under the Clean Air Act.
- ⇒ Proposed Clean Power Plan (www.epa.gov/cleanpowerplan). (Covers 111d/b and CSAPR/transport).
- ⇒ Proposed Clean Power Federal Plan.
- ⇒ The EPA will work with tribal governments with affected sources under the Clean Power Plan (CPP) and will offer consultations to all federally recognized tribes on the CPP Federal Plan.
- ⇒ Petroleum RTR and NSPS.
- ⇒ Regional Haze Regulations and Guidelines.
- ⇒ Emission Guidelines for Municipal Solid Waste Landfills.
- ⇒ Review of the NAAQS for Ozone.
- ⇒ Final Rule: Implementation of the 2008 NAAQS for Ozone State Implementation Plan Requirements (3/6/15).
- ⇒ PM 2.5 NAAQS SIP Requirements.
- ⇒ Major source boilers and area source boilers.
- ⇒ Standards of Performance for New Residential Wood Heaters and New Residential Hydronic Heaters and Forced-Air Furnaces (outreach only).
- ⇒ Tailoring Rule 4.
- ⇒ PVC NESHAP.
- ⇒ Exceptional Events Guidance and Notice of Proposed Rulemaking (NPRM).
- ⇒ Managing Oil and Gas Emissions from Minor Sources in Indian country. Develop approach (i.e., general permit, federal implementation plan, permit by rule, other).
- ⇒ Tribal Minor New Source Review Rule– Final. Bundle #1 and Bundle #2
 - a) Implementation of Tribal New Source Review Rules, includes:
 - Training, outreach, capacity building, planning and development for implementation by tribes and regional offices and meeting data and recordkeeping requirements,
 - Develop general permits and/or permits by rule and other rules to streamline implementation for 11 source categories: gas dispensing facilities; auto body repair and miscellaneous surface coating operations; petroleum dry cleaners; stone quarrying, crushing and screening facilities; hot mix asphalt plants; boilers; spark-ignition engines; compression-ignition engines; graphic arts and printing operations; concrete batch plants; sawmills.
- ⇒ Finalize Revision to National Emission Standard for Hazardous Air Pollutants (NESHAP) for radon emissions for operating mill tailings (40 CFR 61, subpart W). EPA consulted with the Ute Mountain Ute Tribe in FY 2014 and FY 2015. We held follow up meetings with Ute Mountain Ute and other interested tribes, as requested, following publication of the final rule in 2015.
- ⇒ “Health and Environmental Protection Standards for Uranium and Thorium Mill Tailings,” (40 Code of Federal Regulations Part 192 or 40 CFR 192). Informational webinars and presentations were made in 2015. A letter was sent to tribes in January 2015 explaining the proposed rulemaking and inviting tribes to consult on the proposal. No requests to consult were received.

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- ⇒ Environmental Radiation Protection Standards for Nuclear Power Operations 40 CFR 190. An Advance Notice of Proposed Rulemaking outlining the Agency's rationale was published in the Federal Register on Feb 4, 2014. The comment period closed August 3, 2014. To date, the Agency has not made a decision to move forward, but we are interested in getting input from tribal nations prior to moving forward.

A-2. OAR TRIBAL HIGHLIGHTS FOR 2014

The year 2014 was one of sustainable growth for the OAR Tribal Air Program. Working with our tribal partners, we continued our progress forward even with no growth in program funds or resources and continued furloughs to start the year. OAR grew our partnerships with other EPA headquarters, offices, and EPA regions. The staff working on tribal air issues continued to strengthen the bonds of our relationship and worked to ensure we speak with one voice to the Tribes. This was particularly important as we began to address the issues such as treatment in a manner similar to a state (TAS) and other sovereignty-related air issues. We also strengthened our partnership with the National Tribal Air Association (NTAA) Executive Committee and the Institute for Tribal Environmental Professionals (ITEP). The partnerships also together helped to deliver one of the most widely attended and highly praised National Tribal Forum (NTF) on Air Quality in Anacortes, Washington from May 13 – 15, 2014. We also assisted the NTAA in releasing the *Status of Tribal Air Report (STAR)*.

INTERNAL CHANGES, EVENT AND IMPACTS

TAS and Sovereignty – In 2014, two key legal issues related to the implementation of the Clean Air Act (CAA) in Indian country were identified. In Oklahoma, there was a DC circuit court decision pertaining to whether states, EPA or tribes had authority to implement the CAA in non-reservation areas of Indian country and a TAS decision in Wyoming that is currently in a stay while the state appeals EPA's decision to grant the TAS. EPA is still addressing both of these issues which specifically raise policy concerns about tribes and EPA implementing CAA programs in Indian country.

Funding – OAR administers over 12 million dollars in state and tribal assistance grants to provide for tribal governments and institutions to administer tribal air and related training programs. In 2014, this funding slightly increased from the 2013 amount but is still below 2012 and previous years. Tribes have continued to report out to OAR on the effect this lack of adequate funding has had on them. OAR was not immune to reductions either. OAR staff, including all members of the OAR Tribal Team, were required to take furlough days in 2014, making them unavailable to our tribal partners during this time.

NTAA Executive Committee, TAMS Steering Committee and NTF – OAR's primary partners in implementing the tribal air program are the tribes themselves, the NTAA Executive Committee and TAMS Steering Committee. The NTAA and TAMS committees act as a conduit to the tribes and jointly sponsor the annual National Tribal Forum on Air Quality (NTF). OAR partnered with ITEP and the NTAA Executive Committee to support the NTF in 2014. In 2014, OAR continued to support development of tribal capacity to improve outdoor and indoor air quality and implement the Clean Air Act (CAA) in Indian country.

TRIBAL AIR MONITORING SUPPORT (TAMS) CENTER STRATEGIC PLANNING

The successful OAR/ITEP/Tribal TAMS Center collaboration is now in its 14th year – providing technical support to environmental professionals in Indian country. In 2014, the TAMS Center finalized their needs assessment among tribal environmental professionals to help determine ambient/indoor air quality needs and the direction and focus of the TAMS Center in future years. The assessment had various categories asking the participant to prioritize projects based on their needs. A total of 49 tribes participated in the survey. The top three priorities were: 1) continuous ambient air monitoring, 2) indoor air quality, and 3) emission inventory.

The TAMS Steering Committee focused on recommendations based upon the needs assessment survey including monitoring equipment (renewal, new monitoring technology and the equipment loan program), developing an indoor air quality strategy and developing “concept papers” that characterize technical support needs for gravimetric filter weighing and radon. The TAMS Steering Committee met with senior OAQPS and ORIA management at the 2014 NTF and reached mutual understanding on equipment needs and gravimetric filter weighing support. In 2014, the TAMS Center’s equipment specialist has helped to reinvigorate the equipment loan program by repairing and calibrating existing equipment, prioritizing and procuring new equipment and developing “quick start” guides for much of the TAMS Center’s equipment inventory.

COMMUNICATION AND CAPACITY DEVELOPMENT

Ongoing Success with Our Partners - At the end of 2014, EPA regions reported to OAR that seven additional tribes had been found eligible to implement one or more of the CAA programs in Indian country. Five tribes have submitted implementation plans for CAA programs for their reservations. Three tribes are implementing CAA §110, two tribes are implementing Title V permitting programs, and one is developing a minor new source permitting program. Many other tribes are conducting assessments, monitoring their air quality, both indoors and out, and undertaking activities typical of any air quality management program; including conducting outreach and education efforts for their communities; participating in local, regional and national planning efforts and in organizations including NTAA; and working with neighboring jurisdictions and EPA to develop effective programs and policies. OAR implemented a set of activities in 2013 to support these widespread and diverse tribal air quality programs.

The selections below highlight some of OAR’s achievements from our 2014 Tribal Air Agenda.

1. TRAINING AND CAPACITY BUILDING

In 2014, OAR provided numerous training opportunities including:

Ambient Air Quality and Toxics

- a. Held over 38 informational meetings, webinars, listening sessions, and public hearings on topics such as: Carbon Pollution Emissions Guidelines for New and Existing EGUs; Oil and Gas Emissions in Indian Country; General Permits and Permits by Rule for the Tribal Minor

NSR; Proposed Petroleum Refinery Sector Risk and Technology Review and NSPS; NSPS for Wood Heaters; DC Circuit Court Oklahoma Decision; Class I Redesignation and the proposed Data Requirements Rule for the 1-hour Sulfur Dioxide Primary NAAQS. (*See Appendix A-3 for an overview of actions/topics discussed in the webinars and informational meetings.*)

- b.** Supported ITEP trainings, which included SIP training for tribes (training pertains to how tribes can engage on SIP development with the surrounding states), Tribal NSR & CAA Permitting Training, AQS, and emissions inventory trainings.
- c.** The TAMS Center Training and Technical Support
 - 1) Training:
 - Delivered four classroom air quality technical courses:
 - Air Pollution Technology,
 - Application of GIS in Air Quality,
 - Management of Air Quality grants, and
 - Indoor Air Quality Diagnostic Tools for Tribal Professionals
 - Delivered four on-line trainings:
 - Emissions Inventory,
 - Toolbox for tribal professionals,
 - QA 101, and
 - Data loggers use for air quality report.
 - 2) Professional Assistance:
 - Development of a Taos Pueblo Radon Mitigation plan.
 - Providing the Spokane Indian Tribe assistance with their Superfund Cleanup plan.
 - Provided assistance to Shoshone-Bannock Tribes on FMC's Superfund Cleanup.
 - On three occasions provided Moapa tribe on site assistance for their School Air Toxics Monitoring project.
 - Provided Morongo Band of Mission Indians onsite training for repair and calibration of their SO₂ analyzer.
 - Assisted Hopi Tribe to set up Ozone monitoring.
 - Assisted Pala Tribe with Ozone and PM monitoring setup/calibration.
 - Provided Shoshone-Bannock Tribes hands-on training at the TAMS Center on 2000i FRMs.
 - Provided gravimetric laboratory support to six tribes including filter weighing, data validation and reports.
 - Equipment Loan Program:
 - Shoshone-Bannock Tribes received two mini-vols for PM sampling at FMC's Superfund site.
 - Ute Mountain Ute received two TEOM's (continuous PM monitors).
 - Tohono O'odham tribe received two mini-vols for PM sampling.
 - Morongo Band of Mission Indians received a set of School Air Toxic Monitors.
 - Navajo Nation Churchrock Chapter received a set of School Air Toxic Monitoring equipment.
- d.** ORIA Staff presented "Radiation Impacts on Alaska Native Populations," regarding risk from Fukushima-related environmental radiation exposures through traditional diet.

- e. Headquarters and regional Indoor Air staff held a listening session on indoor air and radiation topics.

Indoor Air

Partnership and Collaboration for Tribal Housing

- a. Tribal IAQ Healthy Housing Federal Collaboration Workgroup: EPA has initiated meetings with several federal agencies (HUD, IHS, USDA, BIA, VA, etc.) toward discreet activities that would lead to potentially working together based on the following tenets:
 - 1) Raise Indoor Air Quality (IAQ) awareness and making sure it is a critical factor related toward safer and healthier tribal housing, and
 - 2) To eventually garner collaborative federal support toward the adoption of more improved energy efficient, sustainable building practices; leverage current federal tribal housing grant resources; and enhance grant funding criteria for the overall benefit of making current and future Native American homes and communities safer.

Technical Assistance to Tribes: Indoor Air Quality in Tribal Communities (IAQTC)

- a. A collaboration between NAU/ITEP, Tribal Healthy Homes Northwest (THHNW), EPA and HUD/ONAP resulted in over 100 tribes registering for and attending two educational, instructional webinars to prepare tribes in applying for HUD's recent Mold NOFA – Notification of Funding Assistance (NOFA). This funding is slated to rebuild housing stock affected by mold.
- b. In September 2014, the Yellowhawk Tribal Health Center and EPA-Region 9 hosted the *Northwest Tribal Summit on Improving Asthma Outcomes in Children: Securing Sustainable Financing for In-Home Visits in Seattle*. Feds, local, tribal health and housing agencies identified ways to sustainably finance asthma care and launched a Medicaid reimbursement initiative.
- c. NAU/ITEP staff provided IAQ technical assistance to approximately 60 tribal professionals. Tribal community collaborative efforts were established and fostered. (*Below, see a glimpse of the technical assistance provided by NAU*)
- d. 10/01/13 - Hopi Housing Fair, Second Mesa, AZ– Set up an information table for the Hopi Housing Fair, which was open to the public. Focused on wood stove issues and provided information on a variety of IAQ issues. Met with over 100 community members during the day.
- e. 10/02/13 - Hopi Housing Healthy Homes Training, Kykotsmovi, AZ – Provided a session on IAQ during training on healthy homes conducted by Red Feather Development Group. About 25 tribal staff and community members participated.
- f. 10/14/13 – Indian Education After School Program, Lone Pine, CA – Provided sessions for K-12 students from the After School Program on IAQ issues. Conducted an IAQ assessment of the education center with the help of the students. About 30 students participated.
- g. 10/17/13 – Big Pine Tribal Office, Big Pine, CA – Conducted an IAQ building assessment for the Big Pine Tribal Office with the building manager and the tribal environmental staff.
- h. 10/13/13 to 10/15/13 – San Carlos Schools, San Carlos, AZ – Conducted school building assessments in five San Carlos School district buildings and five tribal head start buildings. Two San Carlos environmental staff and one Inter-Tribal Council air quality staff participated in the building assessments as well as staff from the school district. Met with the

principal and the school nurse following the assessments to discuss the results and to plan for improvements.

- i. 10/15/13 – San Carlos Education Department after School Program, San Carlos, AZ – Provided a presentation for K-12 students from the After School Program on IAQ issues. About 10 students participated.
- j. 02/12/14 – School Health and Indoor Environments Leadership Development (SHIELD) – The IAQTC staff worked with the SHIELD group to conduct a webinar on best practices for conducting a webinar pacing event for IAQ in schools.
- k. 02/13/14 – USEPA Region 9 –The IAQTC staff worked with USEPA Region 9 IAQ staff to conduct a webinar on mold and moisture issues to assist tribal professionals who were interested in preparing to submit a proposal for the HUD/ONAP –Mold (NOFA).

Radiation

- a. Alaska Marine Sampling: ORIA helped to coordinate Federal (EPA, FDA, NOAA) and State (AK, CA WA, OR) fish sampling, water sampling, and debris monitoring and reporting efforts to help Alaska Natives better understand potential Fukushima-related exposure and risk, especially associated with a traditional seafood based diet.
- b. Ute Mountain Ute Tribe, Towaoc, CO
 - 1) Provided information on IAQ issues to response to concerns about the tribal education department building.
 - 2) Three tribal webinars on radon, schools, and asthma were completed and presented to 100 plus attendees online/conference call.
- c. Pilot tribal radiation education materials designed for middle school students in American Indian and Alaskan Native communities. These classroom activities are intended to increase awareness and greater understanding of radiation health risks; the materials focus on the real-life public health and environmental issues (e.g., uranium mining) encountered on tribal lands. Initial pilot testing occurred in Anchorage, Alaska at the 39th Bilingual Multicultural Education/Equity Conference in November 2013. Roll out of the educational materials, alongside ORIA's RadTown took place in August 2014.
- d. In an effort to provide more training to government and tribal governmental personnel, ORIA will offer Multi Agency Site Survey and Investigation Manual (MARSSIM) training this fall via webinar. The training will be free to tribal government personnel. Additionally, ORIA has plans to offer the MARSSIM and Multi Agency Radiation Survey and Assessment of Materials and Equipment (MARSAME) manual training courses as a DVD-based self-study course. This training will be available to government personnel, including those of tribes.

Climate Change

- a. Through an ongoing cooperative agreement with ITEP, OAP has supported development of a national climate change adaptation planning training program and online resources for tribes. [OAP]
 - 1) Over the past three years, under the ITEP training cooperative agreement, 286 people from 120 tribes or tribal organizations have been trained in developing adaptation plans to prepare for the expected impacts of climate change.
 - 2) The ITEP cooperative agreement also provides information and training with a special focus on Alaska Natives. In 2014, ITEP, in collaboration with EPA Region 10, hosted three Alaska webinars. ITEP's tribes and climate change website also

features a case study of a native village and climate science/black carbon fact sheets designed for Alaska natives.

2. TECHNICAL SUPPORT

OAR recognizes the need to provide direct technical support to our tribal partners to assist them in implementing effective air quality programs and projects through the following activities:

Ambient Air Quality and Toxics

- a. Completed and released the *Guidance for Indian Tribes Seeking Class I Redesignation*.
- b. Held monthly tribal New Source Review (NSR) and tribal designation calls with tribal environmental professionals – these calls served as a discussion/informational forum regarding upcoming actions/activities in these areas. [OAQPS]
- c. Worked with Navajo Nation EPA and Region 9 to develop culturally relevant outreach materials and tools to help reduce residential wood and coal smoke from home heating appliances (e.g., coal stoves). [OAQPS]
- d. Developed home heating survey with Navajo Nation EPA and Region 9. <http://www.epa.gov/burwise/pdfs/homeheatingsurveytemplate.pdf>. [OAQPS]
- e. Developed guidance document to provide available “funding ideas” for state, tribal and local areas to replace or install cleaner home heating. <http://www.epa.gov/burwise/pdfs/financing.pdf>. [OAQPS]
- f. Revised guidance document to provide a “how to implement a wood-burning change out program” for state, tribal and local areas. <http://www.epa.gov/burwise/how-to-guide.html>. [OAQPS]
- g. Supported the installation and operation of three CASTNET small-footprint tribal monitoring sites in partnership with the Kickapoo Tribe (KS) (installed Feb 2014), the Red Lake Band of Chippewa (MN) (installed August 2014), and the Confederated Tribes of the Umatilla Indian Reservation (OR) (scheduled for installation in spring 2015). These small-footprint monitoring sites provide a low cost, low maintenance method for tribes to become involved with the CASTNET monitoring program. [OAP]

Indoor Air

- a. The IAQTC website saw 6,500 total visits; an average of about 542 visits per month. This volume compares well with the 1,394 total visits to the IED Tribal website.
- b. Forty new and remodeled tribal homes were built with improved IAQ building standards upon the Spokane Tribal Nation. EPA’s Tribal IAQ Healthy Housing Team collaborated with the Spokane Tribe at its housing authority to assist in the adoption WA states - Evergreen building codes and provide technical assistance to properly apply radon resistant new construction standards; and improved IAQ guidance.
- c. TAMS Center Technical Support
 - 1) Completed the Wet Deposition Mercury monitoring for two tribes for period of one year (Makah Nation, EPA Region 10, and Hualapai Nation, EPA Region 9).
 - 2) Five sets of monitoring equipment was sent to tribes for their use in the field, the equipment included, two mini vols for PM 2.5 measurement, 2 Ozone Analyzers with their accessories and one set of school air toxic monitoring equipment.
 - 3) Nine tribes received \$321K of funding through SIRG grants in FY 2015.

Radiation

- a. In October 2013, ORIA offered a three-day technical Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM) Training Class to Navajo Nation EPA and Bureau of Mines personnel. The training was held in Gallup, New Mexico and was intended to assist the Navajo Nation in conducting and reviewing radiation surveys of sites, including former uranium mining sites. Approximately 15 individuals were trained at this event.
- b. Funding support was provided to Region 9 and the Navajo Nation EPA to help sponsor the annual Uranium Contamination Stakeholder Workshop in Gallup, New Mexico; ORIA covered the total cost of the hotel meeting space and supplies (\$2,753.30). ORIA staff also participated in the April 2013 working meeting, which addressed legacy uranium issues on tribal lands. The workshop focused on the Five Year Plan and included sessions on contaminated water sources, contaminated structures, health, and a community discussion on abandoned uranium mines. Approximately 170 people participated in the two-day workshop.
- c. ORIA engaged tribes in the discussion of a newly revised Protective Action Guides (PAGs) Manual, which was issued for public review and comment. In August 2013, two webinars were offered specifically for our tribal partners. The webinars, which allotted time for questions and answers, provided background information on the PAGs and covered key changes in the Manual from the 1992 version. Approximately 10 individuals associated with our tribal partners participated in the webinars.

3. RULES AND POLICIES

OAR recognized the need to increase the opportunities for tribes to fully participate in the OAR rule and policy development process to ensure that OAR rules addressed tribal concerns and strengthened tribal programs and the implementation of policy making efforts.

Significant Accomplishments for 2014

- a. Presented on tribal conference calls (including monthly NTAA air policy calls, National Tribal Caucus meetings, etc.) and participated at tribal conferences (National Tribal Forum on Air Quality and held informational meetings, listening sessions, public hearings, and webinars on key actions to provide support for tribal participation in the rulemaking process. Presentations and webinars were conducted as part of the rule development process to increase awareness and understanding; during the public comment period to enhance tribes' ability to provide meaningful input; and post proposal, to aid in implementation of final rules.
- b. Conducted outreach and offered, facilitated, and followed-up on government-to-government tribal consultations for OAR rulemakings, guidance documents and other actions.

Ambient Air Quality and Toxics

- a. Invited federally recognized tribes to consult with the EPA on upcoming regulatory actions and/or decisions that may affect them.
 - 1) Sent out seven consultation letters on proposed rulemakings and guidance documents to tribal leadership in each of the 566 federally recognized tribes. [OAQPS]
- b. Held over 16 webinars and informational meetings for tribal environmental professionals on upcoming/proposed regulatory actions and/or policies. In addition, OAQPS formally presented over 15 times on the NTAA & EPA air policy calls providing information/updates on proposed rulemakings, policies and guidance documents. [OAQPS]
- c. Held 13 listening sessions and eight public hearings on Reducing Carbon Pollution from New and Existing Power Plants. [OAQPS]
- d. Completed proposal for general permits and permits by rule for the following 5 source categories: Hot mix asphalt plants; stone quarrying, crushing, and screening facilities; auto body repair and miscellaneous surface coating operations; gasoline dispensing facilities; and petroleum dry cleaning facilities. Published in Federal Register in January 2014. [OAQPS]
- e. Issued a title V operating permit for Deseret Bonanza Power Plant in Utah, located on the Uintah & Ouray Indian Reservation. [OAQPS]

(See A-3 in the Appendix for a listing of the regulatory actions/topics discussed in the monthly NTAA/EPA calls, consultation letters, webinars, and informational meetings.)
[OAR]

Indoor Air

- a. In response to the OAR Tribal Air & Radiation Strategy, the ORIA Tribal Team (headquarters and regions) and Indoor Environments Division worked on developing a federal collaborative partnership with a goal to improve the effectiveness of federal programs and resources in Indian country. Initial work in 2013 focused on identifying key programs and participants at the national and regional level. Initial discussion included HUD's Office of Native American Programs (ONAP), Indian Health Service, USDA's Rural Development Program and BIA's Housing Improvement Program (HIP).

Radiation

- a. In response to food safety concerns raised by Alaska Natives at the November 2013 Alaska Tribal Conference on Environmental Management (ATCEM), ORIA coordinated with other EPA Offices, FDA and NOAA, and participated in an Alaska Department of Environmental Conservation (ADEC) workgroup to identify and publish relevant food safety data, communicate more effectively to tribes on radiation risk from locally harvested foods, as well as to represent the need for additional relevant testing to confirm the safety of locally caught and consumed seafood.
- b. Invited federally recognized tribes to consult with the EPA on 40 CFR 192 and 40 CFR 61 Subpart W.
- c. For Health and Environmental Protection Standards for Uranium and Thorium Mill Tailings (40 Code of Federal Regulations Part 192 of 40 CFR 192):
 - 1) Made informational webinars and presentations to explain the proposal.

- 2) Sent an invitation to tribes in January 2015 explaining the proposed rulemaking and inviting tribes to consult on the proposal. No requests to consult were received.
 - 3) Held 4 public hearings. At the Chadron, NE hearing in May 2015, we had significant attendance by members of the Sioux Tribe. Four members of the Sioux Tribe testified, including a representative from the Oglala Sioux Natural Resource Regulatory Agency.
- d. For Revision to National Emission Standards for Hazardous Air Pollutants (NESHAP) for radon emissions for operating mill tailings (40 CFR 61, subpart W):
- 1) EPA sent letters to approximately 50 tribes, in uranium producing areas, announcing the proposed rule, and requested the tribes to seek consultations with EPA. EPA held a tribal consultation with the Ute Mountain Ute Tribe in July 2014. There was significant communication between EPA and the Tribe prior to the consultation itself, and the communication with the Tribe continued throughout the comment period for the proposed rule.
 - 2) EPA staff held public meetings that included tribal members or representatives in White Mesa, Utah; Gallup, New Mexico; Tuba City, Arizona; and Rapid City, South Dakota.
 - 3) EPA also presented a national webinar for interested parties.
- e. Staff presented on several National Tribal Air Association conference calls with numerous tribes in attendance. Presentations addressed 40 CFR 192, 40 CFR 61 subpart W, and 40 CFR 190.

4. INTERNAL EPA ACTIVITIES AND ADDITIONAL PROGRAMMATIC ACTIVITIES

OAD acknowledges that in order to strengthen our collaboration with tribal communities, every employee of OAD needs to have a working knowledge of how their work may impact tribal communities. Additionally, OAD-managed grants will also continue to help tribes strengthen their efforts to address air pollution. Finally, OAD participated in various internal and external activities to expand overall communication and collaboration with tribal nations.

Highlights from 2014

- a. Increased OAD knowledge of tribal air quality programs and requirements through training efforts.
- b. In 2014, the OAD offices hosted three brown bag events for OAQPS, OAP, ORIA and OTAQ staff on environmental justice (EJ) and tribal issues. On April 2, the OAD tribal brownbag event featured a brief training on the new *OAD Handbook for Interacting with Tribal Governments* as well as presentations from two of our tribal partners in the air world, who discussed how their tribal air programs operate and shared thoughts on how best to work with the tribes. This event was well attended, brought staff together from across the air family and helped to educate staff about tribal issues.
- c. In June 2014, OAQPS held a one day Working Effectively with Tribal Governments (WETG) workshop in RTP, NC for OAQPS staff. There were three presentations from our tribal partners and two presentations from EPA's OGC and AIEO. Topics included an overview of Native American Culture, History and Governmental Relationships; Federal Indian Law: Understanding Jurisdiction, the Federal Trust Responsibility and Legal Issues Regarding Implementation of EPA Programs in Indian Country; Environmental Protection on

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the Fond du Lac Indian Reservation; Overview of EPA's Tribal Program and How Tribal Issues Impact the Agency's Daily Work and a Message to EPA from the Tribes.

- d.** All OAR management and staff completed EPA's "Working Effectively with Tribal Governments" online training.
- e.** Strengthened outreach and communication to increase tribal participation in Diesel Emissions Reduction Act (DERA) grant program.
 - 1) OTAQ hosted multiple DERA teleconferences focused specifically on tribal applications for the new standalone DERA Tribal RFP.
 - 2) OTAQ continued to improve its DERA tribal webpage to feature DERA tribal awardees and share information. <http://www.epa.gov/cleandiesel/prgtribal.htm>
 - 3) OTAQ visited two DERA tribal awarded projects. Staff visited and met with the grant administrators and tribal environment staff from the nations of Swinomish Tribe and Lummi Nation in Washington State.

A-3. 2014 TRIBAL OUTREACH & CONSULTATION ACTIVITIES

1) NTAA & EPA Air Policy Calls – OAR Discussion Topics

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| ⇒ Petroleum Refinery Sector RTR and NSPS | ⇒ Update on the DC Circuit Court Decision on OK | ⇒ Supplemental Proposal: NESHAP RTR for Ferroalloys |
| ⇒ Indian Country NSR Amendments | ⇒ Update on the Supreme Court Decision for the GHG Tailoring Rule | ⇒ Update of EPA Air Pollution Control Cost Manual |
| ⇒ The CAA & Upcoming Greenhouse Gas Actions for Power Plants | ⇒ Tribal Minor NSR -Amendments -Oil & Gas | ⇒ President’s Climate Action Plan |
| ⇒ Status update on Section 111(d) of the CAA | ⇒ Update of General Permits and Permits by Rule for the Indian Country Minor New Source Review Program | ⇒ Proposed NSPS Revision for Residential Wood Heaters |
| ⇒ Transport Issues | ⇒ Tribal Climate and Energy Information Pages | ⇒ Addressing GHGs from Aircraft under the Clean Air Act |
| ⇒ Tribal Greenhouse Gas Inventory Tool | ⇒ Summary of Comments Received at EPA’s Public Listening Sessions for CPP – Existing EGUs | ⇒ Supplemental Proposal: SIPS: Response to Petition for Rulemaking; Finds of Substantial Inadequacy; and SIP Calls to Amend Provisions Applying to Excess Emissions during Periods of Startup, Shut Down and Malfunction |
| ⇒ OAR’s Climate Change Adaption Implementation Plan | ⇒ Proposed HCFC Production Rule | ⇒ Regulating Emissions from Stationary Reciprocating Internal Combustion Engines |
| ⇒ Class I Redesignation Guidance | ⇒ EPA’s Proposed Clean Power Plan | ⇒ Proposed Rule for Radon Emissions from Uranium Mills |
| ⇒ Update on EPA’s MOVES 2014 | ⇒ E.O. 13175 Language for SIP Federal Register Notices | ⇒ US Global Change Research Program’s Climate and Health Assessment |

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|------------------------|--------------------------------------|---|
| ⇒ 40 CFR 192 | ⇒ Summarize Proposal | ⇒ Health and Environmental Protection Standards for Uranium and Thorium Mill Tailings,” (40 Code of Federal Regulations Part 192 or 40 CFR 192) |
| ⇒ 40 CFR 61, Subpart W | ⇒ Summarize comments | ⇒ Revision to National Emission Standard for Hazardous Air Pollutants (NESHAP) for radon emissions for operating mill tailings (40 CFR 61, subpart W) |
| ⇒ 40 CFR Part 190 | ⇒ Summarize considerations for ANPRM | ⇒ Environmental Radiation Protection Standards for Nuclear Power Operations 40 CFR 190. An Advance Notice of Proposed Rulemaking |

2) **Webinars** – 15 webinars were held with tribal environmental professionals on the following proposed actions/activities:

- ⇒ Clean Power Plan – Part 1 – Setting the State Goals.
- ⇒ Clean Power Plan – Part II – Setting the Goals.
- ⇒ Clean Power Plan – Part III – Implementation.
- ⇒ Proposed Revision of NSPS for New Residential Wood Heaters.
- ⇒ EPA Burn Wise – Funding Options for Wood-burning Appliance Change Outs.
- ⇒ Proposed Data Requirements Rule for the 1-Hour Sulfur Dioxide Primary NAAQS.
- ⇒ Introduction to Air Permits.
- ⇒ QA 101 (provided by TAMS Center).
- ⇒ Advanced Emission Inventory (provided by TAMS Center).
- ⇒ Advanced Tribal Toolkit series of webinars on software that assists tribes with ambient air monitoring data management (provided by TAMS Center).
- ⇒ Preparing a Competitive Application for Mold Remediation Funding.
- ⇒ 40 CFR 61 Subpart W Proposal.

3) **Information Meetings/Group Calls/Listening Sessions/Public Hearings** – Over 35 events were held with tribal environmental professionals on the following proposed actions/activities:

- ⇒ Overview of Public Listening Sessions on Carbon Pollution Emission Guidelines (EGUs).
- ⇒ General permits and permits by rule for the Tribal Minor New Source Review Program for Bundle #1 and Bundle #2.
- ⇒ ANPR: Managing Oil & Gas Emissions from Minor Source in Indian Country.
- ⇒ Climate Change Guidelines for New and Existing Electric Generating Units.
- ⇒ Proposed Petroleum Refinery Sector Risk and Technology Review and NSPS.

- ⇒ Regional Meetings: identified ways to sustainably finance asthma care and launched Medicaid reimbursement for feds, local, tribal health and housing agencies.

4) Consultations – Consultation letters on 10 proposed actions were sent to the tribal leadership of 566 federally recognized tribes. A courtesy copy was also sent (via email) to their respective tribal environmental professionals. In addition a notice of consultation was posted in EPA’s Tribal Consultation Tracking System (TCOTS) which is available for viewing by the general public.

- ⇒ CPP – Greenhouse Gas NSPS for EGUs.
- ⇒ Petroleum Refineries Sector RTR and NSPS.
- ⇒ ANPR: Managing Oil & Gas Emissions from Minor Sources in Indian Country.
- ⇒ Proposed Revision of NSPS for New Residential Wood Heaters.
- ⇒ General Permits and Permits by Rule for the Tribal Minor New Source Review (NSR) Program (Bundle #1 and Bundle #2).
- ⇒ EGU GHG Emission Guidelines for Existing Sources Presidential Directive.
- ⇒ 40 CFR Part 61 Subpart W, Revision to National Emission Standard for Hazardous Air Pollutants (NESHAP) for radon emissions for operating mill tailings.
- ⇒ 40 CFR 192 Health and Environmental Protection Standards for Uranium and Thorium Mill Tailings.