

## **Project Description: Assisting Indian Tribes in Submitting their Emissions Inventory Data to the National Emissions Inventory**

The Institute for Tribal Environmental Professionals (ITEP) at Northern Arizona University (NAU) recently submitted a proposal to the USEPA's Office of Air Quality Planning and Standards (OAQPS) to gather tribal emissions inventories from tribes all over the US and reformat the data for submission to the National Emission Inventory (NEI). OAQPS was only able to provide half of the funding required to complete the project. The limitation on funds requires that tribal emission inventory data be prioritized for preparation and submission to the NEI. OAQPS requested that ITEP prioritize the tribal EI data in the following order:

1. major point sources
2. minor point sources
3. on-road mobile sources
4. all other sources.

In this proposal, ITEP seeks to obtain funding to complete this project more thoroughly.

The goal of this project is to facilitate the collection of emission inventory (EI) data developed by Native American tribes and provide for its inclusion in the USEPA 1999 National Emissions Inventory (NEI), version 3. The recent data gathering effort completed by the Tribal Data Development Working Group (TDDWG) of the WRAP indicates that 28 tribes in the WRAP region have completed EIs. The same data gathering effort indicated a shortage of tribal staff working in air programs. Often tribes have enough staff time to develop their emissions inventories but it is difficult to take on the additional task of reformatting the data for the NEI. Through this project, ITEP will provide a data formatting service to tribes who wish to participate. Additional funding from the WRAP would ensure that WRAP region tribe's EIs receive a high priority for inclusion in the NEI through this project.

This project dovetails with TDDWG and ITEP's current project, the development of tribal EI template software. The current scope of work with ITEP's WGA/TDDWG project will not accomplish the stated purpose of this proposal because ITEP is limited to developing the EI template software. As ITEP reviews and reformats the tribal EI data it receives, we will gain a clearer picture of the types of sources most common on reservations. We will also gain an understanding of the types of information shortfalls most common in tribal EIs. By identifying these issues and source types, the TDDWG tribal EI template software can be created to serve the needs of as many tribes as possible. This information will also assist ITEP in modifying its existing EI workshop to meet the needs of tribes more closely and to educate them on what types of information are required elements in the national and regional databases.

### **Background**

ITEP has been developing relationships with tribes all over the United States since 1992 through training and technical assistance programs. Through these relationships, ITEP has gained the respect and trust of many tribal environmental professionals. This trust facilitates the sharing and pooling of tribal environmental data. Recent data gathering efforts at ITEP identified a shortage of tribal staff working on air quality issues. While many tribes have completed emissions inventories for use in their own communities and in their tribal air programs, they often lack the staff time to use the data to gain representation in regional and national processes. As regional planning organizations and federal agencies try to obtain tribal data to include in their data sets, they are faced with the difficulty of identifying which tribes have developed the data

that they need. Once tribes are identified there are the additional tasks of obtaining approval from tribal governments to release the data and assisting tribal staff in compiling and submitting the data. With this project, ITEP will assist tribes who have EIs in being represented in the 1999 NEI, version 3.

### **Work Plan**

ITEP proposes that the following tasks be completed under this proposal in a grant period extending from November 1, 2001 to October 31, 2002. The budget required to complete these tasks is attached.

#### Task 1: Identify Tribes who have EIs

Through a data gathering effort funded by the Tribal Data Development Working Group (TDDWG) of the Western Regional Air Partnership (WRAP), ITEP has developed a list of 28 tribes in the WRAP region who have conducted EIs. Using this information, ITEP will develop a mailing list of tribes who will be invited to participate in this project.

#### Task 2: Notify Tribes of the Opportunity to be Represented in the 1999 NEI.

A letter requesting that the tribes release their EIs to ITEP for inclusion in EPA's 1999 NEI will be developed and sent to tribes with EIs. ITEP's Project Coordinator will follow up on the letters with phone calls. The Project Coordinator will also track the progress of the request within each tribe. ITEP will develop a fact sheet to assist tribal environmental professionals in gaining approval from their tribal governments to release the data. If tribal government approval is granted, ITEP will request that a complete copy of the EI be sent to ITEP. ITEP will obtain and document written approval from each tribe who agrees to share their EI with ITEP, WRAP and EPA. ITEP will not be conducting a survey as part of this project, only requesting that tribes submit complete copies of their EI. Tribes will be asked to supply their data to ITEP no later than March 1, 2002. This task will be completed under the funding supplied by OAQPS.

#### Task 3: Quality Assurance/Quality Control (QA/QC)

As ITEP begins receiving EI data from tribes, they will work in consultation with OAQPS to develop criteria for which data meets the standards for inclusion in the 1999 NEI. ITEP's Program Manager will work with OAQPS staff and WRAP EI Forum members in developing other criteria for inclusion in this project. Preliminary discussion with OAQPS staff indicates that preference should be given to larger tribal point sources, with smaller sources being included as resources allow. Criteria and emission source cut-offs for inclusion to the NEI will be developed by September 2001. The EI Forum and TDDWG will be consulted on priorities and criteria that WRAP would like to apply to the tribal EI data received from WRAP region tribes. An ITEP Research Specialist will apply the criteria to each tribal EI as it is received. In consultation with ITEP's Program Manager, the Research Specialist will document which tribal EIs meet the criteria for inclusion in the 1999 NEI and this project.

#### Task 4: Extracting Data From Tribal EIs

The ITEP Research Specialist will extract the information required by the 1999 NEI from each tribal EI that meets the QA/QC criteria and emission source and quantity cut-offs as set by OAQPS and WRAP. The Program Manager will provide oversight and assistance in this task. Data will be extracted as the EIs are received and as resources allow. ITEP's Database Specialist

will create an interface for data entry into ITEP's EI database. The Research Specialist will enter the data into the database. ITEP's Database Specialist will work with OAQPS staff and EI Forum members to refine the database and insure consistency with the NEI data format.

Informal review of several tribal EIs, conducted by ITEP, indicates that some tribal EIs may lack information mandatory in the NEI such as SIC codes, SCC codes and location data. As resources allow, ITEP will attempt to fill in the missing data to provide the NEI and WRAP with a complete and usable emissions record. ITEP will endeavor to include area source data reported by the tribes in this project as resources allow. Tribal area source data overlaps state area source data, which is reported by county. By collecting tribal area source data in the NEI format, the data will be available for future discussions on which data set, state or tribal, should be used in national and regional modeling efforts.

#### Task 5: Final Tribal Review of EI data Compiled for Submission to the 1999 NEI

Once ITEP has applied the QA/QC criteria and extracted the applicable information from the tribal EIs, ITEP will send to each participating tribe a summary of the data to be submitted to the 1999 NEI on their behalf. This summary will be in an easily understood format. Tribes will be asked to give a final verbal approval for the submission of their data to EPA's 1999 NEI. If a tribe's EI did not meet the criteria for inclusion, ITEP will send a letter to the tribe indicating why their data was not submitted to the NEI.

#### Task 6: Submission of Tribal EI Data to the 1999 NEI.

ITEP will format all tribal EI data for submission to the 1999 NEI, in accordance with EPA guidance. ITEP's database specialist will work with OAQPS to identify and solve any problems encountered during data submission. All tribal EI data will be submitted by June 1, 2002. Data will be submitted in the current version of the NEI Input Format (NIF). ITEP will continue work, as resources allow, to include sources of lower priority to OAQPS in ITEP's database, which will closely relate to the NEI format. This phase of the task will focus on any WRAP region tribes and priorities that were not included in the June 1, 2002 submission to the NEI due to OAQPS priorities. This data will be made available to the EI Forum by October 31, 2002.

### **Reporting and Coordination**

ITEP will submit quarterly reports to the TDDWG and the EI Forum describing the progress of the activities under each task. The attached budget requests funding for travel to attend EI Forum meetings as necessary. The formatted data collected during the project will be supplied to the WRAP EI Forum. A final report, describing the successes and difficulties encountered in the tribal EI gathering process will be submitted in October 2002.

**Proposal to Assist Tribes in Submitting  
Emissions Inventories to the National Emissions Inventory**

November 1, 2001 to October 31, 2002

<b>I. Staff Salaries</b>	<b>Rate</b>		
Program Manager	\$ 40,000.00	20%	\$ 8,000.00
TERC Research Assistant	\$ 24,000.00	42%	\$ 10,080.00
Database Specialist	\$ 36,365.00	20%	\$ 7,273.00
Computer support, student	\$9/hr	300 hrs	\$ 2,700.00
Budget Manager	\$ 29,367.00	5%	\$ 1,468.35
<b>Total</b>			<b>\$ 29,521.35</b>
<b>II. Fringe</b>	<b>Rate</b>		
Program Manager		21.27%	\$ 1,701.60
TERC Research Assistant		22.00%	\$ 2,217.60
Database Specialist		18.62%	\$ 1,354.23
Student worker		1.00%	\$ 27.00
Budget Manager		20.02%	\$ 293.96
<b>Total</b>			<b>\$ 5,594.40</b>
<b>III. Communications/Supplies</b>			
Communications			\$ 2,000.00
Supplies			\$ 1,000.00
<b>Total</b>			<b>\$ 3,000.00</b>
<b>IV. Travel - Staff (All tasks)</b>			
Staff travel to EI Forum and TDDWG meetings			\$ 3,000.00
<b>Total</b>			<b>\$ 3,000.00</b>
<b>VI. Direct Costs</b>			<b>\$ 41,115.75</b>
<b>VII. Indirect (Salaries &amp; Wages x 47.8%)</b>			<b>\$ 14,111.21</b>
<b>Total</b>			<b>\$ 55,226.95</b>