**2021 Fall TAMS Steering Committee Meeting**

**October 19-20, 2021**

**In attendance:**

Randy Ashley, Christal Black, Pat Childers, Ann Marie Chischilly, Vallen Cook, Hayden Hardie, Lori Howell, Secody Hubbard, Carma Huseby, Luke Jones, Josie Kamkoff, Mehrdad Khatibi, Mike King, Kayla Krauss, Christopher Lee, Mike Natchees, Mansel Nelson, James Payne, Camille QuickBear, Tanda Roberts, Melinda Ronca-Battista, Darlene Santos, Ed Wilds, Jr., Leroy Williams, Tiffany Wolfe

**Tuesday, October 19**

**Invocation, Welcoming and Introductions –**

The meeting was called to order by Chairperson Vallen Cook. Mike Natchees gave the invocation, and everyone was welcomed.

**Role of the TAMS Steering Committee (SC) – Chris Lee, ITEP TAMS Program Manager/Hayden Hardie, EPA TAMS Director**

* Review of Charter language
* SC members input are valuable; share with other tribes
* Your perspective is valuable; information is helpful to anything we do at TAMS Center
* SC members to help coordinate discussion of topics at future meetings; participate in development of agenda items and feedback is important; insight is valuable on how we guide and direct SC members

**The Big Picture: EPA, the Tribes, and the TAMS Center – Chris Lee, ITEP TAMS Program Manager/Hayden Hardie, EPA TAMS Director**

* **Government to Government Relationship and Trust responsibility**

**Clean Air Act and the Tribal Authority Rule Overview/Update – Pat Childers, EPA-OAR**

Titles of the Clean Air Act:

* Title I – NAAQS and HAPs
* Tile II – Mobile Sources
* Title III – General Administrative including tribal
* Title IV – Acid Deposition
* Title V – Permits
* Title VI – Stratospheric Ozone

 CAA Amendments of 1990: Title I

NAAQS

* Attainment areas
* Nonattainment areas
* National Ambient Air Quality Standards (NAAQS)
* EPA required to review every 5 years

 Criteria Pollutants:

* Particulate matter (PM10 and PM2.5)
* Lead
* NOx
* SO2
* CO
* VOCs (ozone precursors)

CAA Amendments of 1990: Section 112

Hazardous Air Pollutants (HAPS)

* 187 HAPS identified by Congress
* “Technology-Based Standards”
* MACT/BACT
* Residual Risk Standards 8 years after each MACT
* Program can be delegated to states and tribes that seek authority

 National Visibility Goal

* Prevention of future, & remedying of existing, visibility impairment in mandatory Class I federal areas resulting from human-made air pollution

Regional Haze Rule

* Promulgated July 1999
* Mandatory federal Class I areas
* One “deciview” improvement each 10 years
* Regional planning organizations
* SIP planning to attain background by 2064

CAA Amendments of 1990: Title II

Mobile Source Provisions

* Reserved for EPA (few exceptions)
* New vehicle standards
* On-road
* Off-road
* Diesel
* Locomotives
* Gasoline formulations

CAA Amendments of 1990: Title IV

Acid Deposition Program

* Establishes cap and trade allowances for
* Sulfur dioxide
* Nitrogen oxides
* Program is working better than expected

CAA Amendments of 1990: Title V

Operating Permits

* Major sources
* HAP sources and criteria pollutants
* Delegated to states and tribes
* Significant fees/revenues

 CAA Amendments of 1990: Title VI

 Stratospheric Ozone Protection

* CFC production ban of 1996
* Bans on other substances to follow

 CAA Amendments of 1990: Summary

 6 titles address major pollutants

* Act still being tweaked, no major rewrites since 1990
* New actions to address climate change
* Evolving role of non-federal regulators

Tribal Authority Rule (TAR) Overview

TAR Development

* CAA Implementation Authority [Section 301(d)]
* 1990 CAA Amendments
* Tribal air management authority
* TAS
* EPA proposed implementation in 1994
* Eligibility requirements
* Application procedures
* Provisions for “treating tribes like states”
* Rule proposed Aug. 1994
* Rule promulgated Feb. 1998

 Framework for Tribal Implementation of CAA

* Jurisdiction
* Sovereign immunity
* Modular approach
* Grant match requirement
* Federal implementation
* Eligibility requirements

Tribal Jurisdiction

* Within exterior boundaries of reservation
* Other areas where tribes can demonstrate jurisdiction

Modular Approach

* Ensures flexibility
* Tribes and EPA develop approaches
* Elements to be
* Reasonably severable
* Consistent with legal requirements

Grant Match Requirements

* Grants under Sec. 103 & 105
* Sec. 103 requires no match
* Sec. 105
* 5%, then 10% after 2 years with TAS with EPA RA demonstration of tribe’s ability to increase its share
* 40% without TAS
* Waivers available for hardship
* Match waiver announced in 2021 for Tribal PPGs
* EPA will review program over time

Federal Implementation

* Trust responsibility
* Federal Implementation Plan (FIP) required
* Where necessary or appropriate provisions
* Without unreasonable delay

 Eligibility Requirements

* Federally recognized tribe
* Governing body with substantial governing duties and powers
* Statement of tribe’s authority
* Capability to carry out program

 TAS

* TAS is eligibility
* Implementation another matter
* Administrative programs – nothing to implement (CAA 105), does not require separate program
* No obligation
* Part on unique 2-step process (TAS/TIP)
* 40 CFR 49.9 details EPA review
* Within 30 days of completeness finding
* Notice/comment to appropriate governmental entities
* (g) if EPA RA determines tribe meets requirements of 49.6 for purposes of a CAA provision, Indian tribe eligible to be treated in same manner as a state with respect to that provision

 TIP

* Tribal Implementation Plan
* Paralleled by SIP and FIP
* Implements TAS programs
* Tribe must submit demonstration of capability to implement
* Can be combined with or separate from TAS application
* Does create an obligation
* (h)…a tribal application containing a CAA program submittal will be reviewed by EPA in accordance with applicable statutory and regulatory criteria in a manner similar to the way EPA would review a similar state submittal
* Tribes have been approved for CAA 106, 107. 110
* Administrative delegations of 105, 505(a)(2)
* Navajo Nation has delegation of Part 71
* Southern Ute has approval for Part 70
* Minor NSR permitting at St. Regis Mohawk

**1984 Policy for the Administration of Environmental Programs on Indian Reservations – Luke Jones, EPA-OITA**

* Basic Principles
* Native Land: 1492
* Native Land Transfers: 1775-1819
* Native Land Transfers: 1820 – 1897
* Native Lands: 1997 – Present
* Native Lands – Future?
* Direct Implementation by EPA in Indian Country
* Generally, States do not have authority in Indian country
* EPA must “implement directly Federal environmental programs required or authorized by law in the absence of an acceptable tribal program.”
* FY 2001 Approp. Bill; P.L. 106-377, 114 Stat. 1441 (2000)
* EPA Indian Policy (1984) – EPA was the first federal agency to adopt a formal Indian Policy
* Guiding Principles:
* Work proactively and directly with Indian tribes (“gov.-to-gov.”).
* Recognize the sovereignty of tribal governments to set standards, make policy decisions, and manage reservation programs.
* Encourage and assist tribes to take regulatory and program management responsibilities for reservation lands.
* Identify and remove existing legal and procedural impediments to working effectively with tribes.
* Ensure that tribal concerns and interests are considered whenever actions may affect reservation environments.
* Encourage cooperation between tribal, state, and local governments.
* Enlist other federal agencies with related responsibilities on Indian reservations to support cooperative efforts.
* Ensure compliance with environmental statutes and regulations on Indian reservations.
* Incorporate these principles into planning and management activities, and ongoing policy and regulation development processes.
* Suggested Readings:
* “The Origins of EPA’s Indian Program” (March 28, 2006) by Prof. James Grijalva
* **History: Air Monitoring, Tribes, and the TAMS Center**

**ITEP Cooperative Agreement 1994 – Classroom trainings on tribal air quality programs – Mehrdad Khatibi**

**TAMS Center History – Randy Ashley, Confederated Salish & Kootenai Tribes**

* TAMS Timeline; How it all unfolded –

1999:

* In the beginning; Pre-Functional meetings and discussions
* First Document; Meeting Goals for Air Quality; Monitoring on Tribal Lands
* NTAQF; Phoenix, December 16, 1999

2000:

* Second Document; Strategy for Supporting Tribal Air Monitoring Programs, January 25, 2000
* DC Meeting, February 17, 2000
	+ FY 2000 Proposal
* Establish the Tribal Air Monitoring Support (TAMS) Center
* Form a Tribal Steering Committee to provide program oversight
* Design a database to serve as a clearinghouse, and
* Develop a collaborative training and technical support program for tribal air monitoring needs
	+ TAMS Center Development Schedule:
* PM 2.5 Introductory
* 2 Advanced Classes



* + Summary of Needs:
* Determining air quality with respect to the NAAQS
* Acquiring information on current conditions and long-term trends (criteria and toxic pollutants)
* Examining source-specific impacts
* As a component of larger environmental/ecological assessment
* Assessing visibility impairment and causes
* As necessary for new source review
	+ The Six W’s:
* What is the purpose(s) of the air monitoring?
* What methods will be employed, e.g., instrumentation, analyses?
* What will be the duration of the program?
* What will it cost, and where will the resources come from?
* Who will do the work, e.g., siting, installation, O&M, QA/QC?
* What will be done with the data?
	+ Optional National Strategy
* Recognize and support private contractors hired by tribes to assist with specific monitoring activities. Several contractors have experience with tribal program support and should be utilized consistent with their expertise, capacity and proximity.
* Encourage and support collaboration with state and local air monitoring programs in close proximity to tribal lands. Some effective collaborative efforts are in place.
* Encourage inter-tribal collaboration to realize advantages of scale (maybe inter-governmental, private not-for-profit, or for-profit enterprises)
	+ Roles for the TAMS:
* Building tribal professional expertise
* Guidance
* An air monitoring instrumentation laboratory
* On-site technical training and assistance
* Guidance on QA/QC and data management and analysis
* A technology transfer center
* A repository of assessment studies and emissions data for tribal lands
* Structure:
* Located at the ORIA (former) lab in Las Vegas
* Staffed by ITEP and ORIA
* Steering Committee Oversight
* Staff: Technical Director; Training and Outreach Director; Instrument Technician; Administrative Support Specialist

**Selection of Vice Chair and new steering committee member – Vallen Cook, Grand Portage/TAMS SC Chair**

* No nominations were received
* November 7 is deadline for nomination applications
* SC members agree to have Vallen continue as TAMS Chairman
* SC members voted for Mike Natchees as new Vice Chair
* Add to agenda, review and discuss new applications received at next SC call in November

11:00 – 12:00: **AIAQTP Training Courses – COVID has affected the ITEP Training Courses from being offered in-person. – Christal Black**

* Review of AIAQTP Courses & OAQPS
* AIAQTP –
* 20-22 trainings
* 8 online self-paced
* 2 Alaska Trainings
* 8 trainings (lower 48)
* 2-4 mini trainings (special requests)
* OAQPS –
* 2 trainings:
* Wildland Smoke-On Demand and Webinar
* Into to AQ Modeling for Permitting Programs
* Trainings offered during COVID
* Webinars (18)
* Online self-paced training (8) 1 new
* Virtual Cohorts
* Indoor Air Quality
* Intro---Addressing Air Quality in Tribal Communities
* Wildland Smoke
* Air Quality Permitting
* Indoor Air Quality in Alaska Communities
* Project Planning, QAPPs and Grants
* 18 Archived Webinars 2020-2021
* Tribal Air Program Development & CAA
* Tribal Case Studies (GAP, 103, 105)
* Project Planning
* Road Dust Series
* Wood stoves Series
* QAPP
* Air Quality Permits
* Air Monitoring and Remote Assistant
* Data Management and Data Bases
* Purple Air Data Management
* QREST
* Emissions Inventories
* 8 online self-trainings
* Building Performance: Improving IAQ in Cold Climates
* Building Performance: Improving IAQ in Warm Climates
* Residential Building Science Review
* Radon Fundamentals
* Quality Assurance Fundamentals
* Writing a Quality Assurance Project Plan
* Emissions Inventory Fundamentals
* Emissions Inventory Advanced
* Alaska Trainings – Mansel Nelson
* Existing On-Demand Courses for Alaska:
* Building Performance: Improving IAQ in Cold Climates
* Radon Fundamentals
* Courses offered in Alaska over the last 3 years:
* Indoor Air Quality in Alaska Native Villages (Level 1)
* Air Quality in Alaska Native Villages (Ambient and IAQ) (Level 1)
* Project Planning, QAPPs, and Grants (Level 2)
* Indoor Air Quality Diagnostic Tools for Alaska (Level 2)
* Conferences and Meetings
* ATCEM Nov 19
* IGAP Conference Dec 6
* AFE Conference Feb
* On Demand courses are webinars
* Identified key issues to work on:
* Wood Stoves – Review existing recorded wood stove webinars. Consider additional Alaska specific wood stove webinars. Coordinate with Leif Anderson and Tony Ward on additional training resources, including HEPA filters. Importance of dry wood. Wood stove change-outs are important to Alaska communities. (Note: Various communities may have IGAP funds or ARP funds that could be used to purchase HEPA filters). Lots of State of Alaska and EPA resources available.
* Webinars – Wood Stoves in Alaska
* On-Demand Wood Stove Course
* Indoor Air Quality / COVID – Review existing resources. Importance of ventilation and filtration. Encourage use of HRVs. Avoid unproven technologies.
* Webinars – IAQ (Ventilation and Filtration)
* Landfill Burning – Review State of Alaska and EPA resources available.
* Webinars – Landfill Burning
* Air Quality Sensors – Review existing recorded air sensor webinars. Develop Air Quality Sensor webinars for Alaska. Coordinate with Barbara Trost and Mary Mullan.
* Webinars – Air Quality Sensors
* Road Dust – Convert 4 road dust webinars into an On-Demand course. In addition to the 4 webinars, work with David Barnes and Billy Connor on some “hands-on” activities to include in the course. Lots of State of State of Alaska and EPA resources available.
* On-Demand Road Dust Course
* Radon – Add a module to the existing On-demand Radon course that provides Alaska specific information. Include the Alaska radon video recently done. Include a module on e-Perms as well. Perhaps start with a webinar, then convert that into an on-demand module.
* Webinar – Radon in Alaska
* On-Demand Radon in Alaska Module
* Indoor Air Quality in Alaska Native Villages (Level 1) – We have a course on Scholar LMS that is designed to be instructor lead. This course could be updated as an on-Demand course.
* Climate Change – UAF studying the melt of permafrost using some sort of monitoring device in relation to more methane and radon gases being released. Basically, a technical grasp of the discourses on the global aspects of climate change is needed in Indian Country today. The ability to address climate change in everyday terms in Indian communities is absolutely necessary in order for that community to make healthy decisions with regards to itself and the next generation.
* Refer to ITEP Climate Change Program, Nikki Cooley
* Existing On-Demand Courses for Alaska:
* Building Performance
* Radon Fundamentals
* Pat suggested that perhaps SC members along with regional tribal air coordinators could help determine what classes are needed on an annual basis early in the process; some how setup standard operating procedure to develop new courses and develop methodology; make public to SC members
* 9 Trainings (tentative)
* Addressing Air Quality in Tribal Communities (2) – Virtual Cohort, Aug & Jan
* Management of Tribal Air Programs and Grants – Virtual Cohort, Nov
* Met Monitoring – Webinar Series or Virtual Cohort, Jan or Feb
* Air Quality Computations – Cancelled
* Air Pollution Technologies – Webinar Series or Virtual Cohort, March; last offered in 2018; need SC feedback
* In-Person April-June 2022
* Indoor Air Quality in Tribal Air Communities, April
* Indoor Air Quality Diagnostic Tools, April or May
* Fundamentals of Air Monitoring, May
* Air Quality Outreach and Education, June

**Are the current online trainings and webinars useful? What other types of training are needed? Are current topics meeting the needs of the Tribes? How can the training program be adjusted to be more useful?**

* Carma mentioned Wildfire smoke webinars are valuable; plan to get purple air sensors and place next to PM 2.5 monitors to track trends
* Vallen mentioned it would be beneficial to have Intro to Meteorological course for air quality
* Carma mentioned IAQ is hard right now
* Vallen mentioned Ernie Groom’s is working on remote IAQ assessment; would be interesting to have
* Lori mentioned all trainings have been great and useful; good for refreshers
* Pat suggested ITEP should create accessible video library; categorize IAQ, Grants, air monitoring, etc.; useful for future
* Christal mentioned converting recorded webinars series, i.e., Road Dust, Wildland Smoke, into online self-paced course; open to larger audiences
* 8 Hr. HAZWOPER course is still offered by ITEP waste management team
* Chris mentioned great idea to have library of resources; develop resource information center (RIC); going through changes; ITEP is working to develop the ORCA tool to meet need
* Lori mentioned bring back support from John Meade’s position; enforcement of compliance etc. to meet tribal needs
* Christal requested feedback from SC members for air pollution tech course
* Review key topics and activities; provide input on how to add to virtual course; what or what not to include; what’s still relative; good to develop SOP on training courses
* Will share agenda and provide update on progress of course
* What is course objective; review; send questions or comments
* Narrow down course objectives to three or four instead of seven
* Intro to meteorology and how weather works; covered slightly in tech course; need separate course designed for that
* Mike Natchees mentioned core classes are used as jumping point to other courses; basic courses seems packed and overwhelming
* Mike also mentioned there is not a lot of courses offered for more advanced programs; would like to see the task course of Clean Air Act and Permitting offered again for those moving towards regulatory side
* Vallen mentioned Air Modeling course; request more advanced courses level 3
* Christal appreciated feedback; can offer level 3 courses as mini course, virtual course or location based course to meet tribal training needs
* Leroy requested to have training to begin discussing planning for advanced courses

12:00 – 1:00: **TAMS Needs Assessment Report** – **Chris Lee, ITEP TAMS Program Manager**

* Took in information last year; extensive report
* Chris shared last implementation report; last version was done 2016-2017
* Need to work with SC members
* Facilitate discussion with SC members on separate meeting or part of monthly call; SC members to decide
* Update where needed using format of 2016 version; get out to your tribal location
* Recommend comparing results to NTAA; can be separate phone call
* Pat reported NTAA did not finish; they extended to end of year; results by February
* Get more east coast tribes involved; get TACs involved with needs assessment
* Ideal to get east coast representative
* Requested courses to be held in east coast
* Suggested also hold classes at RTP
* Mike N suggested to add needs assessment as part of end of class requirement to complete and submit from all participants

**ACTION ITEMS:**

* Short general information sheet for new SC members
* Add to next month’s agenda discussion and review of TAMS SC nominations received; possibly revote for Chair and Vice Chair positions; Pat mentioned he will reach out to TACs
* Create accessible video library of ITEP/AIAQTP/training courses; require further discussion with ITEP
* Work on air pollution tech course planning; SC members to provide feedback
* Chris to update needs assessment with new data; will have further discussion on November call; make 2-year assessment rather than 5-year
* Get east coast tribes involved
* Check in with NTAA with their needs assessment results

**Wednesday, October 20**

8:00 – 10:00: **Tribes and Regulatory Air Monitoring – Leroy Williams, GRIC, and Chris Lee, ITEP TAMS Program Manager (Invited: Tribes conducting regulatory air monitoring: Pam Atcitty, Stan Belone, April Hathcoat, Tiffany Wolfe)**

**GRIC Air Monitoring Network**

* History
* GRIC Jurisdiction
* NAAQS Designation
* Data – 20 years
* QAPP Re-Approval status
* Issues and Concerns
* Our proposal
* Next steps

**GRIC DEQ Air Quality Program**

* 1998 0 CAA103, CAA105
* Compliance and Enforcement
* Air Monitoring
* 2002 – started Ozone, PM2.5, and PM10 monitoring with approved QAPP
* Two Air Quality Specialist
* Overlapping roles and responsibilities
* 3 monitoring sites
* Ozone (2)
* PM2.5 (2)
* PM10 (1)
* GRIC Jurisdiction
* Within two Arizona Counties
* Maricopa County area
* Designated NonAttainment (NAA) – 1980s and 1990s
* Ozone
* PM10
* Pinal County area
* To date Unclassified/Attainment
* Has not been designated; deferred in 2010
* Technical Corrections – 2005 for Ozone
* GRIC St Johns ozone monitoring data
* All area of GRIC in Unclassified/Attainment for Ozone only
* Gila River Indian Community
* Sovereignty
* GRIC is a rural area with agricultural values
* Tribal Implementation Plan (TIP) / Air Quality Management Plan (AQMP)
* Delegated CAA program
* Compliance and Enforcement
* Rules and Regulations
* Minor Source Permitting
* NAAQS Monitoring
* PM10 Data
* Numerous NAAQS exceedances
* High wind events
* Exceptional events (EE)
* EE Demonstrations
* Maricopa County
* Ongoing NAA for PM10
* Phoenix Metropolitan Area NAA
* GRIC Air Monitoring Quality Assurance Project Plan (QAPP)
* QAPP Submitted for Re-Approval, March 2021
* Not Approved, August 2021
* QA Independence not being met
* Data Validation – 3 levels of review not met
* Limited Resources
* Independent QA Manager
* Extensive data validation roles and responsibilities
* More stringent QA/QC requirements
* At least at a minimum of 3 professional air quality staffing
* Next Steps
* Problem Solving steps
* Review of GRIC AQ Monitoring Org Chart Data Gathering

**How does your tribe handle the level 3 data reviews? How does your tribe handle the QA independence?**

***April Hathcoat, Cherokee Nation –***

* 3 staff in air monitoring program; 2 staff handle all field work and QAPP work
* April handles all AQS data upload
* No one outside of air program that is doing data review right now; that’s how it is on their QAPP; so far no push back
* As far as QA Independence, we have an independent auditor that they pay for; does audits at sites for annual audits; they visit all sites three quarters out of the year; costs $13k from grant funds
* Have independence, but at a cost
* Region 6; written into grant to provide audits for other tribes in our region; don’t have PQAO; we just perform audits so they can use for their QA independence; doing audits for 3 tribes

***Stan Belone, Salt River Pima-Maricopa Indian Community –***

* Doing portion of level 3 data; same as Gila River
* Staffing issues; looking at having data analysis coordinator position to handle data processing
* Consult with EPA on these issues; relating to QA officer that we’re acquiring; not fully established
* Independent audits; use agency that handle performance audits
* Have to comply with EPA regulations
* Work with Region 9

***Mike Natchees, Ute Indian Tribe –***

* Regulatory monitoring for NOX and ozone; operate 4 sites in reservation; handle data by contracting out
* Prior to joining air program, EPA operated 4 sites, tribe decided to take over, kept contractor on
* Set up now with 2 staff; handle all field operations, repair and maintenance, calibrations on site, QA checks, etc.
* Data side goes to contractor Trinity Consultants; they review data and validate it; they get it ready for AQS and send files back to Mike; he uploads everything into AQS
* Also have contractor do independent audits; quarterly third-party audits
* EPA handles NPAP and Technical Systems Audit
* Appreciate this conversation; at some point, would like to see our tribe become fully independent and handling our own data
* When time comes, how are we going to handle this; will we get staffing to do that; will it be more cost effective to keep our consultant on or begin to hire the staff to gain that independence

***Pam Atcitty, Morongo Band of Mission Indians –***

* Regulatory monitoring for ozone
* Recently submitted PM QAPP to EPA; a lot of questions with QA independence with our data
* 6 staff in environmental department; field technician, data analyst, QA officer/manager; important to separate manager from field technician work; new staff requires manager to be out in field with her; technically cannot be a QA manager
* Had to get creative; EPA suggested they write a quality independence policy, which allows her to hand over QA manager portion of her job to her supervisor while she is in the field
* Gives her authority to go beyond regular chain of command if there was ever issue in program; funding, maintenance, manpower etc.., and somehow held up in supervisor’s position, she can go to director or tribal council
* Draft of QA independence policy is currently under review
* Creating flexibility with program; allows her to work in the field; hopefully her position will just be QA officer only; written in QAPP, adding QA independence policy; that will be sent to tribal council and signed off

***Tanda Roberts, Pyramid Lake Paiute Tribe –***

* Pyramid Lake does monitoring for informational purposes
* Also having the same issue; one team person; handles all steps which EPA does not accept
* Collecting, reviewing and submitting data
* EPA Project officer asked about the independent contractor that handles monitoring equipment audits annually; asked if it would be possible to get more money for contractors to do more work such as data reviews and quality assurance; she agreed to it as solution; didn’t realize other tribes were having same issues; maybe there’s a way to collaboratively get together and create solution that will work for all and not overlap other agencies that would benefit from getting grant money to find solution

***Tiffany Wolfe, Pechanga Band of Luiseno Indians –***

* When running regulatory program, definitely need tribal source funding; EPA grants will not fund your whole program
* We collect data to provide information to the community
* The Pechanga Air Program consists of 5 contractors; 1 contractor handles level 3 data review; reviews QAPP and SOPs; 1 contractor does performance evaluation and audits for equipment; EPA sends NPAP auditor; 1 staff handles CARB lab, take equipment to Sacramento for certification; staff in laboratory for PM costs
* Southern California Tribal Air Monitoring Collaborative; 18 tribes in San Diego county; tribes in Morongo and Riverside; trying to expand; be able to depend on each other to meet qualifications
* EPA came out to discuss level of independence; level 1 environmental technician handles equipment; level 2 data validation, flagging, making sure all certifications are done; level 3 goes through and fine-tooth comb; send to Kelsey for review; just started QA reviewer who reviews data completion report, audits, certifications

***Chris -***

* Appreciate all information provided by the tribes
* Important for addressing situation
* Understand what other tribes are dealing with
* Regulatory monitoring is important especially for tribes in areas where there’s a lot of sources affecting the air quality
* Discuss options for addressing situations

**Consistency and transparency in the QAPP review process –**

* Pat asked if SC members consider writing letter to EPA; Melinda can point to actual discrepancies
* Leroy mentioned ready for next step; we have data; have interest in building capacity to next level; we clearly demonstrated what we are doing and what we are capable of doing; tribes are applying for TAS ongoing; need balance on resource and what requirements are under these programs
* SC members to address QAPP issues and what they want done
* Figure out plan; SC members to decide next step
* If policy issues, SC present to NTAA and NTC side as option
* Initial stages of identifying all options before we move into next step of determining what to do
* Action Item: contact EPA have workshop or discussion; with region; Leroy mentioned perhaps Pat can give guidance on QAPP reviews; dialogue with agency ways to address issue; possibly develop subcommittee

**Consolidated Primary Quality Assurance Organization (PQAO) –**

* Tribes in Southern California area requested how to develop a consolidated PQAO
* What were necessary requirements; would handle QA independency as well as determining who would do the level 3 reviews, etc.
* Assistance from Mike Papp, OAQPS; drafted guidance on PQAO; offered suggestions on what was necessary; one of those items was a Quality Management Plan (QMP) to be the guide for overall consolidated PQAO; all partners within the organization would have their own individual QAPPs for their various projects; the document that would hold the organization together is the QMP; Southern California tribes began that effort
* Could the TAMS Center serve as that consolidated PQAO and provide some duties and be the organization to hold the PQAOs together for the tribes; may be possible conflict of interest for the amount of support that we provide
* Option for tribes to work amongst themselves to develop their own consolidated PQAO
* Limited funding; evaluate tribal needs
* Southern California tribes to remain their separate PQAOs; still provide assistance to one another; not operating under one QMP document

**Circuit Rider for Level 3 data review and other tasks requiring QA independence –**

* Should all be under the same QAPP for consistency
* Lots of deficiencies with contractors
* We want quality data
* Can TAMS assist with issues
* Work with tribes and get their input; so conflicts don’t exist, can add to next 5-year grant
* Pat mentioned the need to get things in writing either in RFA or letter for SC members; once in writing can start moving this forward
* Big commitment on both sides; from tribal side, TAMS and EPA side

**Action Item –**

* Develop subcommittee on issue of consistency and transparency in the QAPP review process; continue discussion
* SC members agreed to move forward with drafting letter and work with NTAA for any inputs

**American Rescue Plan: How can the TAMS Center help Tribes access the ARP funds? – Pat Childers, EPA OAR**

* Should apply under direct and competitive funding; unless there is some limits in that RFA
* Once RFA is out; there will be a presentation
* Couple areas of funding; one is the enhanced regional capacity for short term community monitoring needs; sort of a loaner program; $5 million for mobile monitoring labs and or air sensor loan programs within the 10 regions; based on letter, TAMS is now being considered for some of the $5 million
* Funds out there; 50m for monitoring
* Co-signing letter with NTAA; request for TAMS funds is now being considered
* Direct awards: 22.5m go to direct awards specific air monitoring
* For continuous monitoring for ambient air; mostly regulatory; sensors being considered
* Spreadsheet of list of tribal needs and desires for monitoring equipment; marry with existing document
* Encourage tribes to apply for direct and competitive funding; will be overlap
* Will be a tribal set aside for competitive grants
* Figure out dollar value for request to direct funding
* How can the TAMS Center keep the regional equipment inventory accurate and updated?
* Hayden already started equipment list
* Revisit list and keep accurate of 88 tribes monitoring; how many are monitoring, etc.
* Good opportunity for tribes to get older monitors and use as tribes get upgraded equipment
* Communicate with tribes available equipment tribes are getting rid of or what to do with old equipment; utilize listserv
* Carma reported some tribes are upgrading all BAMS to Teledyne PM monitors; referred TAMS to receive older BAM equipment; will send contact information; equipment are still fairly new within 5 years old
* If equipment was acquired through federal funding; may have to go thru EPA excess surplus
* If equipment is over 10yrs old; parts may no longer be available

**ACTION ITEM:**

* SC members to send email notice to tribes regarding older equipment, etc.; communicate with tribes
* Pat to do presentation on RFA; put together what to do with old equipment; make sure EPA does not want back; use listserv; make available to other tribes; find if TAMS needs or dispose properly
* Tim Hanley and Mike King can help with equipment decisions

**TAMS Workgroups/Subcommittees: What workgroups need to be developed, who will participate, and how they will operate? – Mehrdad Khatibi, ITEP Assistant Director**

* Which workgroups can we prioritize? What’s critical for SC to focus on and discuss; define objectives
* Vallen to help assist and start up
* Workgroups:
1. Monitoring: QAPP/Regulatory monitoring/Equipment/Loaner program – Mike N, James, Carma, Mike K, Chris, Hayden, Melinda, Josie
2. Supporting Tribal Air Programs: AIAQTP courses with collaboration component for newbies and seasoned staff/grants in general and work plan development (strengthen)/TAS/Staff Turnovers – Pat, Vallen, James, Christal, Mike N
3. IAQ technologies (balance w/NTAA) – Christal or Mansel; Camille; Secody to report out
4. Agenda planning – Chris, Pat, Vallen, Hayden

**Action Item/Next Step**:

* Darlene to organize first meeting of workgroups; discuss purpose, define objectives and prioritize; report out at November call

**Meeting Closeout: Action Items and determine 2022 Meeting date – Vallen Cook, Grand Portage/TAMS SC Chair**

* Plan Spring meeting 2nd week of March; discuss logistics and decide on next call November
* Check hotel meeting rooms; work to secure contract
* EPA still on critical travel; all federal staff to verify vaccination with EPA; moving date to November 3
* Uncertain until after January; travel restrictions and vaccine update
* Pat requested to meet at RTP or DC for future meetings

**ACTION ITEM:**

* Provide general information to new incoming SC member; role of TAMS SC member
* Pat to reach out to eastern region tribes for east coast representation; SC members to reach out to contacts
* Understanding how the new PPG match requirements helps tribes that have TAS issues still go to 105; will address in new workgroup
* AIAQTP training courses; what classes are needed early in the process; SOPs for developing new courses
* Create accessible video library for all ITEP training courses
* Chris will update past report format of needs assessment with new data; discuss information and define action items on November call; also discuss further if needs assessment should be every 2 years rather than 3-5 years; get more east coast involved
* Check-in with NTAA and their needs assessment; how are they getting more results; up to 100 results received
* SC members to address QAPP issues figure out plan and next step; draft letter to EPA, etc.; form workgroup to continue discussion on Consistency and Transparency in the QAPP review process
* Contact EPA have workshop or discussion on Consolidated Primary QA Organization (PQAO); perhaps Pat can give guidance per Leroy
* SC members agreed to move forward with drafting letter; discuss with NTAA for comments; urgent matter; Chris and Melinda to assist; Mike Natchees, Mike King and Josie; expect update before November meeting
* American Rescue Plan (ARP): $50 million for monitoring; Spreadsheet of list of tribal needs and desires for monitoring equipment; marry with existing document
* Equipment: SC members to create information document for tribes regarding older equipment, etc.; communicate with tribes using listserv
* Pat to do presentation on RFA; put together what to do with old equipment; make sure EPA does not want back; use list serv; make available to other tribes; find if TAMS needs or dispose properly
* Darlene to organize first meeting of workgroups; discuss purpose, define objectives and prioritize; report out at November call
* Vallen will send email to Tanda and provide workgroup information

Submitted by:

Darlene Santos