

Approved by KCarre

**Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians FY20
& FY21 Clean Air Act Section 105 Grant Proposal**



Application for FY 2020 & FY 2021 Funding

Under Section 105 of the Clean Air Act

Submitted to: U.S. Environmental Protection Agency, Region 10

**Submitted by: Confederated Tribes of Coos, Lower Umpqua, and
Siuslaw Indians' Natural Resources Department**

DUNS #: 161160445

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GENERAL ADMINISTRATIVE INFORMATION

Applicant's Address: 1245 Fulton Avenue Coos Bay, Oregon
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Project /Budget Period: October 2019 thru September 2021

Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians Air Quality Program

Mission Statement: Research, protect, and enhance both the ambient and indoor air quality of the Tribes to support environmental quality and human health. Overall, the Culture and Natural Resource department embraces our Tribe's lessons and lifeways to protect, inform, and enhance the lives of our people, the health of our environment, and the sustainability of our community."

Program Description: The Air Quality Program works to identify, minimize, and/or eliminate any negative impacts that can be linked to the exposure of poor air quality in an overall effort to protect and improve the health of the Tribal membership and the Tribal environment. Work includes development of indoor air quality priorities and training for indoor air quality issues, outreach addressing indoor air quality issues, outreach addressing smoke issues related to wildfire and other fire smoke events, and training for reviewing New Source Review and Title 5 permits. Additionally, a percentage would be allocated to maintain the Tribes Air Quality Station which collects both particulate (PM 2.5) and meteorological data near Coos Bay, Oregon. Something about increase in wildlife frequency.

Background, Purpose, and Need

Background: The Confederated Tribes of the Coos, Lower Umpqua and Siuslaw Indians (Tribes) are one of the nine federally recognized Tribal Governments located within Oregon. The Tribal Government is headquartered on the South-central Coast of Oregon near Coos Bay, Oregon with Reservation lands located in Lane, Coos, and Curry Counties. The Tribes are governed by a seven-member Tribal Council and have a growing membership currently totaling 1209 Tribal Members.

The Tribes established a Department of Culture and Natural Resources (CNR) which is funded in part by the U.S. EPA. The EPA funds support the development and implementation of environmental protection programs that work to protect Tribal air, water, and land quality with funding provided under the authority of the Indian Environmental General Assistance Program Act, Sections 106 and 319 of the

Clean Water Act, Section 128 of CERCLA, and previously, Section 103 of the Clean Air Act. The Department of Natural Resources established an Air Quality Program (AQP) in 2005. This program was initially dependent on EPA's Indian General Assistance Program (IGAP) funding and CAA Section 103 funding to accomplish program objectives. This includes the completion of a Tribal Air Quality Assessment, a draft Emissions Inventory, an EPA approved Quality Assurance Project Plan for an air quality monitoring project on tribal lands, submittal of a "Treatment in the Same Manner as a State" (or TAS) for Section 105 and 505 (a)(2) of the Clean Air Act application to EPA, development of capacity to review and respond to major and minor air quality permits, draft air quality regulatory mechanisms on tribal lands, and completion of multiple air quality trainings.

Capacity was previously built to establish the above listed functions of the Tribes' AQP through extensive training, and new staff will continue to complete training as needed to perform work under this grant.

Capacity was largely lost when trained staff left the Tribes in 2011 and a lapse occurred in AQP staff. Another staffing lapse occurred in 2018. As of September 2018, staff works in an ongoing fashion with The Tribal Environmental Exchange Network support, IPS Meteostar, and other tribes' AQ staff to do data collection, Air Quality System (AQS) data formatting and AQS data submission. As of September 2019, the AQP has a part-time Air Protection Specialist.

In 2008, the AQP applied for and received grant funding support under Section 103 of the Clean Air Act to implement the AQP's Quality Assurance Project Plan (which was developed using IGAP funds) for the Tribal Air Quality Monitoring Project. The monitoring project is focused on providing a baseline assessment on PM 2.5 and meteorological conditions on the Tribal Reservation at Coos Bay, Oregon. The CAA Section 103 funding ended in 2012 after which the Tribes' AQP has been supported by IGAP funds (through September 30, 2014).

In 2017 the Tribes were granted two years of funding under Section 105 of the Clean Air Act. This funding sustained the Tribe's ability to build on the capacity that was established using IGAP and Section 103 funding and to secure a permanent base funding source to advance and sustainably institutionalize the Tribal AQP. For the AQP to become securely institutionalized within the Tribal government, a stable base funding source analogous to Clean Water Act Section 106 and 319 funding needs to be established. The Tribal Council approved a TAS application for Sections 105 and 505(a)(2) of the Clean Air Act on February 8, 2009 by Tribal Resolution #09-018. The TAS application submitted to EPA for review in March of 2009 and approved by EPA on 13 September 2010.

The AQP works with the Tribal Environmental Exchange Network to manage, display, and report on all air quality data collected, and quality assured data have been entered into AQS per EPA requirements. As of 2019, technical support for the Tribal Environmental Exchange Network is undergoing a provider change.

Purpose: The purpose of this funding proposal under Section 105 of the Clean Air Act is to expand capacity for the Tribes to sustain and support the existing Air Quality Program and the ambient air monitoring station. Additionally, it will support a continued effort to improve the Tribes involvement in Indoor Air Quality Issues that are significant to the Tribal communities here on the Oregon Coast.

Summary of Work Plan Objectives 2020 & 2021

This proposal for funding under the authority of the Clean Air Act Section 105 builds on the accomplishments that the AQP has achieved since 2005 with EPA IGAP, CAA 103, and CAA 105 funding support. More specifically:

The **first objective** is to continue attend workshops, trainings, and/or conferences that increase the effectiveness of the Air Quality Program with respect to indoor air quality, prohibitive burning, and development of outreach materials and review of Title V permits. Currently employed or newly hired Tribal Natural Resource staff will attend air quality courses provided by ITEP, AQ webinars, training opportunities offered by EPA, state AQ programs or other Tribal AQ programs, and/or meetings like the National Tribal Forum to assist with capacity building and development of an Air Quality Program Plan.

The **second objective** is to review and update the Air Quality Program Plan at least every two years. The Air Quality Program Plan guides the development and implementation of the AQP. AQP includes indoor air quality, Title 5 review criteria, prohibitive burning, cultural practices, and outdoor air quality. The development of this plan will provide a resource for the Air Quality Program to guide the systematic accomplishment of the program goals which will benefit both the Tribes and EPA.

The **third objective** is to produce outreach materials for Tribal members regarding issues and exposures related to indoor air quality, outdoor air quality, and prohibitive burning.

The **fourth objective** is to track and review Title V permit applications which may affect the Tribal reservation.

The **fifth objective** of this funding proposal is to maintain and operate air quality monitoring capacity, which currently consists of the station located next the Tribal Administration Building on the Tribal Reservation. CAA 103 funding supported the initial operation of the air quality monitoring station, IGAP supported through September of 2014, and currently CAA 105 funding supports data management and analysis from the air station. The AQP would like to continue to maintain the monitoring capacity developed and continue to operate the air quality monitoring station. The operation of this station provides the only PM 2.5 data being collected on the Oregon Coast. The operation of this station also provides data available to evaluate the necessity for burn bans implemented under the authority of FARR. This station provides baseline data prior to any nearby development that may affect air quality—possibly to include a liquefied natural gas (LNG) import/export terminal, a natural gas cogeneration plant, a container ship import facility, and/or a coal export facility – of industrial facilities and associated trans-oceanic cargo ship activity immediately upwind of this station and the surrounding Tribal community. In addition, there is one established Title V source within Coos County, Roseburg Forest Products Co., approx. 18 miles away from the CTCLUSI Air station in Coquille Oregon. To sustain proper data management and data analysis, the AQP will be contracting with Ott HydroMet to resume technical support for our air station through the TREX network.

The **sixth objective** is to continue to build capacity and knowledge of indoor air quality issues and monitoring techniques and equipment. In addition, the EVM3 particulate monitoring device will

continue to be employed to improve the health and wellbeing of tribal members as related to indoor air.

The **seventh objective** is to research and build capacity for the eventual implementation of an air toxics monitoring and response program with an emphasis on airborne lead and mercury. It is of particular interest to study what toxics are related to wildfire events.

The **last objective** is to submit all required quarterly progress reports and a final report to EPA on time. (0.02)

To accomplish these objectives, the Tribes are requesting EPA funding for an Air Quality Specialist.

Workplan Objectives (*includes indirect and match*)

2020 Objectives Direct Cost Summary:

A) Development of the Air Quality Program staffing knowledge to include indoor air quality, prohibitive burning, Title V permit review and outreach and outdoor monitoring techniques.

Tasks: 1) Identify and attend workshops, trainings, and/or meetings focused on Air Quality Program development.

Timeframe: October 2019 thru September 2021

Deliverables: 1) Functions attended will be reported in quarterly progress reports.

Estimated Cost: \$3035

B) Review/Revision and implementation of Air Quality Program Plan

Tasks: 1) Update Air Quality Program Plan and submit 2) Improve Title V review process and conduct reviews and submit comments

Timeframe: October 2019 thru September 2021

Deliverables: 1) Up to date Air Quality Program plan (full reviewed biennially or as needed) 2) Outreach development 3) Title V reviews and comments as needed

Estimated Cost: \$5059

C) Produce outreach materials for Tribal members regarding issues and exposures related to indoor air quality, outdoor air quality, and prohibitive burning.

Tasks: 1) Outline issues and hazards with respect to indoor air, outdoor air and prohibitive burning exposures 2) Provide pamphlets and outreach materials online.

Timeframe: October 2019 thru September 2021

Deliverables: 1) 3 newsletter articles or standalone pamphlets 2) 3 online links and resources for outreach materials 3) 3 public outreach events

Estimated Cost: \$3035

D) Review/Revision of Title V Permit Application Review protocol and review permits as needed as well as other permits that impact air quality.

Tasks: 1) Biennial review of Title V Protocol document 2) Continue development of capacity for permit review 3) Track any Title V permit applications 4) Provide comment as an affected “state” on Title V permit applications as needed

Timeframe: October 2019 thru September 2021

Deliverables: 1) Biennial review of Protocol document 2) List of any permits reviewed 3) Copy of any comments offered on Title V permit applications.

Estimated Cost: \$5059

E) Maintain, Collect, Analyze, and Manage Near-Continuous PM 2.5 and Meteorological Data at the Established Air Quality Station using TREX

Tasks: 1) Collect air quality data at the established monitoring station on tribal lands. Perform annual calibrations or audits. 2) Validate air quality data collected 3) Submit air quality data collected to AQS. 4) Complete periodic review of Air Quality Monitoring QAPP and submit any proposed revisions to EPA for concurrence

Timeframe: October 2019 thru September 2021

Deliverables: 1) Submittal of quality assured air quality data into AQS. 2) AQP QAPP revisions (if needed) submitted to EPA 3) Update SOPs for PM 2.5 and Meteorological Data

Estimated Cost: \$13,153

F) Build capacity and knowledge with indoor air monitoring techniques and equipment and outdoor air equipment, pollution and capacity to improve emissions of overall tribal government.

Tasks: 1.) the creation and review of the SOP for the all air monitoring equipment and update regularly 2) develop a protocol & identify necessary equipment for on the spot indoor air testing. 3.) Assess tribal members indoor air quality needs 4) evaluate best outdoor air systems and data validation methods. 5) VW emissions trustee applications and project work to improve overall air quality emissions of tribal government

Timeframe: October 2019 thru September 2021

Deliverables: 1) Provide Tribal members with data and information to improve their indoor air quality

Estimated Cost: \$20,235

G) Prepare and Submit Quarterly and Final Progress Reports to EPA.

Tasks: 1) Prepare and submit all quarterly progress reports and final reports throughout the duration of the project as required by EPA.

Timeframe: October 2019 thru September 2021

Deliverables: 1) Submission of all EPA required quarterly progress reports.

Estimated Cost: \$1012

2021 Objectives Direct Cost Summary:

A) Development of the Air Quality Program staffing knowledge to include indoor air quality, prohibitive burning, Title V permit review and outreach.

Tasks: 1) Identify and attend workshops, trainings, and/or meetings focused on Air Quality Program development.

Timeframe: October 2019 thru September 2021

Deliverables: 1) Functions attended will be reported in quarterly progress reports.

Estimated Cost: \$3120

B) Review/Revision and implementation of Air Quality Program Plan

Tasks: 1) Update Air Quality Program Plan and submit 2) Improve Title V review process and conduct reviews and submit comments

Timeframe: October 2019 thru September 2021

Deliverables: 1) Up to date Air Quality Program plan (full reviewed biennially or as needed) 2) Outreach development 3) Title V reviews and comments as needed

Estimated Cost: \$5199

C) Produce outreach materials for Tribal members regarding issues and exposures related to indoor air quality, outdoor air quality, and prohibitive burning.

Tasks: 1) Outline issues and hazards with respect to indoor air, outdoor air and prohibitive

burning exposures 2) Provide pamphlets and outreach materials online.

Timeframe: October 2019 thru September 2021

Deliverables: 1) 3 newsletter articles or standalone pamphlets 2) 3 online links and resources for outreach materials 3) 3 public outreach events

Estimated Cost: \$3120

D) Review/Revision of Title V Permit Application Review protocol and review permits as needed as well as other permits that impact air quality.

Tasks: 1) Biennial review of Title V Protocol document 2) Continue development of capacity for permit review 3) Track any Title V permit applications 4) Provide comment as an affected “state” on Title V permit applications as needed

Timeframe: October 2019 thru September 2021

Deliverables: 1) Biennial review of Protocol document 2) List of any permits reviewed 3) Copy of any comments offered on Title V permit applications.

Estimated Cost: \$5199

E) Maintain, Collect, Analyze, and Manage Near-Continuous PM 2.5 and Meteorological Data at the Established Air Quality Station using TREX

Tasks: 1) Collect air quality data at the established monitoring station on tribal lands. Perform annual calibrations or audits. 2) Validate air quality data collected 3) Submit air quality data collected to AQS. 4) Complete periodic review of Air Quality Monitoring QAPP and submit any proposed revisions to EPA for concurrence

Timeframe: October 2019 thru September 2021

Deliverables: 1) Submittal of quality assured air quality data into AQS. 2) AQP QAPP revisions (if needed) submitted to EPA 3) Update SOPs for PM 2.5 and Meteorological Data

Estimated Cost: \$13,518

F) Build capacity and knowledge with indoor air monitoring techniques and equipment and outdoor air equipment, pollution and capacity to improve emissions of overall tribal government.

Tasks: 1.) the creation and review of the SOP for the all air monitoring equipment and update regularly 2) develop a protocol & identify necessary equipment for on the spot indoor air testing. 3.) Assess tribal members indoor air quality needs 4) evaluate best outdoor air systems and data validation methods. 5) VW emissions trustee applications and project work to improve overall air quality emissions of tribal government

Timeframe: October 2019 thru September 2021

Deliverables: 1) Provide Tribal members with data and information to improve their indoor air quality

Estimated Cost: \$20,797

G) Prepare and Submit Quarterly and Final Progress Reports to EPA.

Tasks: 1) Prepare and submit all quarterly progress reports and final reports throughout the duration of the project as required by EPA.

Timeframe: October 2019 thru September 2021

Deliverables: 1) Submission of all EPA required quarterly progress reports.

Estimated Cost: \$1040

Air Quality Program Budget FY2020 & FY2021

Year One

October 2019– September 2020	EPA Funded	Tribal Match (10%)	EPA+Tribal
Personnel Air and Water Protection Specialist; DNR Director (match)	\$23,036	\$3039	\$26,075
Fringe Benefits (25%) Social Security Insurance; Medicare premiums; workers compensation insurance; medical, dental, and vision insurances; short term and long term disability insurances; retirement benefits; and life insurance)	\$5759	\$760	\$6,519
Subtotal Staff	\$28,795	\$3799	\$32,594
Travel 2 per year. Travel purposes include attendance at EPA and Tribal Air Yearly Meeting, Institute for Tribal Environmental Professionals training. (Estimated Cost/Trip = Airfare-\$500; and for non-ITEP travel Hotel-\$354 and Per Diem-\$612)	\$2501		\$2,501
Supplies Miscellaneous office and field supplies. (Costs include specialized office supplies not covered by indirect costs, printing of outreach materials, data storage, and supplies for nephelometer and meteorological station including calibration and audit supplies.)	\$0		
Training There are no training/workshops registration fees required for ITEP trainings.	\$0		
Equipment All major equipment necessary to continue operating the air quality monitoring station is in serviceable condition. Some small pieces, such as rubber tubing, outdoor wiring, and a fish pump, need to be replaced	\$0		
Contractual Services Annual audit/calibration/servicing of the nephelometer and meteorological equipment by the manufacturer Met-One (\$502). TREX upkeep contract (\$2018).	\$2520		\$2520
Subtotal Direct	\$33,816	\$3799	\$37,615
Indirect Charges 49.6%	\$16,772	\$1884	\$18,656
Total Air Quality Program Cost	\$50,588	\$5683	\$56,271

Year Two

October 2020– September 2021	EPA Funded	Tribal Match (10%)	EPA+Tribal
Personnel Air and Water Protection Specialist; DNR Director (match)	\$23,727	\$3131	\$26,858
Fringe Benefits (25%) Social Security Insurance; Medicare premiums; workers compensation insurance; medical, dental, and vision insurances; short term and long term disability insurances; retirement benefits; and life insurance)	\$5932	\$783	\$6,715
Subtotal Staff	\$29,659	\$3,914	\$33,573
Travel 2 per year. Travel purposes include attendance at EPA and Tribal Air Yearly Meeting, Institute for Tribal Environmental Professionals training. (Estimated Cost/Trip = Airfare-\$537; and for non-ITEP travel Hotel-\$354 and Per Diem-\$306 and taxi \$90.50)	\$2575		\$2575
Supplies Miscellaneous office and field supplies. (Costs include specialized office supplies not covered by indirect costs, printing of outreach materials, data storage, and supplies for nephelometer and meteorological station including calibration and audit supplies.)	\$0		
Training There are no training/workshops registration fees required for ITEP trainings.	\$0		
Equipment All major equipment necessary to continue operating the air quality monitoring station is in serviceable condition. Some small pieces, such as rubber tubing, outdoor wiring, and a fish pump, need to be replaced	\$0		
Contractual Services Annual audit/calibration/servicing of the nephelometer and meteorological equipment by the manufacturer Met-One (\$503). TREX upkeep contract (\$2018).	\$2521		\$2521
Subtotal Direct	\$34,755	\$3,914	\$38,669
Indirect Charges 49.6%	\$17,238	\$1941	\$19,179
Total Air Quality Program Cost	\$51,993	\$5855	\$57,848

Narrative Description of Budget Expenses Year 1. (2020)

Year One
Personnel

October 1, 2019 -September 30, 2020: The amount of **\$32,594** (\$28,795 Federal/\$3799 Tribal) including fringe, will pay the Air and Water Protection Specialist to accomplish the workplan objectives described above from October 2019 through September 2020. These amounts include fringe benefits based on 25% of salaries and are based on the Tribes' 2019 fringe rates budgeted for tribal employees and include FICA, FUTA, SUTA, Industrial Insurance, and medical, dental, vision, pharmaceutical, disability, and life insurances. Fringe amount of **\$6,519 (\$5,759 Federal/\$760 Tribal)**. All of the above are necessary and reasonable costs for the recruitment and retention of qualified staff. The Tribal match includes meets the 10% required and will pay for project coordination and supervision by the Tribes' Department of Natural Resources Director.

Travel

October 1, 2019 -September 30, 2020: The amount of \$2501 will cover travel cost for approximately 2 trips per year. Travel purpose includes Air and Water Protection Specialist attendance at EPA and Tribal Air Yearly Meeting, and ITEP trainings that increase the technical capacity of the AQP. Costs include airfare, and for non-ITEP travel per diem, hotel, and taxi/shuttle expenses, and are based on expenses from previous years.

Equipment

October 1, 2019 -September 30, 2020: All equipment necessary to continue operating the air quality monitoring station is in serviceable condition. Small maintenance items, primarily rubber tubing and wiring, are included in supplies. We continue to look out for opportunities to purchase new air monitoring equipment that allows us to be more targeted and permits us to more easily verify our data.

Supplies

October 1, 2019 -September 30, 2020: No funding is being requested

Training

October 1, 2019 -September 30, 2020: There are no training/workshops registration fees required for ITEP trainings, so no funds are requested for training during this project period.

Contractual

October 1, 2019 -September 30, 2020: The amount of \$2520 will be used for annual TREX support costs and air station equipment maintenance or calibration

Indirect Costs

October 1, 2019 -September 30, 2020The amount of \$18,657 (\$16,772 Federal/\$1,884 Tribal) will pay for indirect costs. The most current negotiated indirect rate is 49.60% for 2018.

Year Two
Personnel

October 1, 2019 -September 30, 2020: The amount of \$33,573 (\$29,659 Federal/\$3914 Tribal) including fringe, will pay the Air and Water Protection Specialist to accomplish the workplan objectives described above from October 2019 through September 2020. These amounts include fringe benefits based on 25% of salaries and are based on the Tribes' 2019 fringe rates budgeted for tribal employees and include FICA, FUTA, SUTA, Industrial Insurance, and medical, dental, vision, pharmaceutical, disability, and life insurances. Fringe amount of **\$6,715 (\$5,932 Federal/\$783 Tribal)**. All of the above are necessary and reasonable costs for the recruitment and retention of qualified staff. The Tribal match includes meets the 10% required and will pay for project coordination and supervision by the Tribes' Department of Natural Resources Director.

Travel

October 1, 2019 -September 30, 2020: The amount of \$2575 will cover travel cost for approximately 2 trips per year. Travel purpose includes Air and Water Protection Specialist attendance at EPA and Tribal Air Yearly Meeting, and ITEP trainings that increase the technical capacity of the AQP. Costs include airfare, and for non-ITEP travel per diem, hotel, and taxi/shuttle expenses, and are based on expenses from previous years.

Equipment

October 1, 2019 -September 30, 2020: All equipment necessary to continue operating the air quality monitoring station is in serviceable condition. Small maintenance items, primarily rubber tubing and wiring, are included in supplies. We continue to look out for opportunities to purchase new air monitoring equipment that allows us to be more targeted and permits us to more easily verify our data.

Supplies

October 1, 2019 -September 30, 2020: No funding is being requested

Training

October 1, 2019 -September 30, 2020: There are no training/workshops registration fees required for ITEP trainings, so no funds are requested for training during this project period.

Contractual

October 1, 2019 -September 30, 2020: The amount of **\$2,521** will be used for annual TREX support costs and air station equipment maintenance or calibration

Indirect Costs

October 1, 2019 -September 30, 2020: The amount of \$19,179 (\$17,238 Federal/\$1941 Tribal) will pay for indirect costs. The most current negotiated indirect rate is 49.60% for 2018.

Environmental Results (EPA Order 5700.7)

- PM 2.5 and meteorological data will be documented in accordance to an EPA approved QAPP on Tribal Lands.
- PM 2.5 air quality data is accessible to Tribal Members, the US EPA, the Oregon Department of Environmental Quality, and the public. Better understanding and documentation of local air quality conditions by operating and maintaining a continuous PM 2.5 and meteorological station on the reservation. Provide quality assured data into EPA's AQS. Development and completion of an Air Quality Program Plan. Final Project Report to Tribal Council and EPA. Assist EPA with the implementation of the Federal Air Rules for Reservations (FARR) and provide data for burn bans. Improved effectiveness of the Air Quality Program.

Joint Performance Evaluation Process

During the project period, Department of Natural Resources staff will submit quarterly performance report detailing the accomplishments toward the completion of work plan commitments, discussing the work performed for all work plan components, and identifying any existing problem areas that could affect or delay project completion. If the EPA Project Officer, after reviewing the report, finds that the recipient has not made sufficient progress under the work plan, EPA and the Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians Tribal Council will negotiate a resolution that addresses the issues. The evaluation process will help to ensure that the grant is being administered properly and that work conducted under the grant is in accordance with approved work plan.

EPA Roles and Responsibilities

The EPA will have no substantial involvement in the accomplishment of work plan commitments. EPA will monitor progress and provide technical assistance as needed to ensure project completion.