TWO EPA/IHS INITIATIVES

1) Open Dump Fieldwork Pilot
2) Operations & Maintenance Needs Study

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Open Dumps Overview & Video

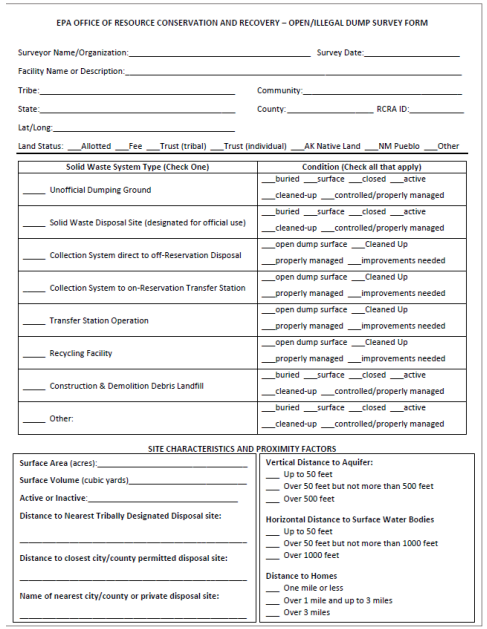
- EPA and IHS MOU
- Planning Ahead
- Open Dump Fieldwork Training
- Improving Mobile App Functionality
- Getting to the Finish Line

90 second video You-Tube link: https://youtu.be/YvwlUpabFx4

EPA and IHS Collaboration: The MOU

The 2017 Memorandum of Understanding between Indian Health Services and EPA has six focus areas for activity. The open dump pilot aligns with 3 areas:

- IHS commits to continued review and update of the open dump inventory data included in the Operation and Maintenance Data System (OMDS) with a goal of improving the accuracy and completeness of the data to better characterize the public health and environmental risks of open dumps.
- IHS and EPA commit to collaborate on the development and delivery of open dump assessment training for IHS, EPA, and tribal staff to improve the skills of these staff in assessing open dumps and accurately entering data into OMDS.
- IHS commits to incorporate into the IHS Sanitation Deficiency System the results of EPA-conducted evaluations and assessments of tribal government solid waste management programs to assist with identifying projects that are ready to be funded.



EPA OFFICE OF RESOURCE CONSERVATION AND RECOVERY – OPEN/ILLEGAL DUMP SURVEY FORM

Surveyor Name/Organization:_____ Survey Date:_____

Facility Name or Description:_____

Tribe:_____ Community:_____

State:_____ County:_____ RCRA ID:_____

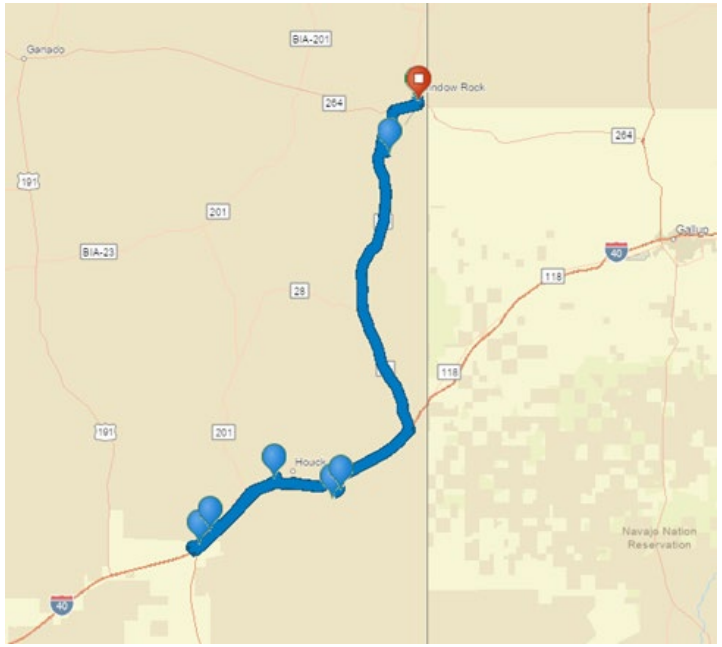
Lat/Long:_____

Land Status: ___Allotted ___Fee ___Trust (tribal) ___Trust (individual) ___AK Native Land ___NM Pueblo ___Other

Solid Waste System Type (Check One)	Condition (Check all that apply)
_____ Unofficial Dumping Ground	___buried ___surface ___closed ___active ___cleaned-up ___controlled/properly managed
_____ Solid Waste Disposal Site (designated for official use)	___buried ___surface ___closed ___active ___cleaned-up ___controlled/properly managed
_____ Collection System direct to off-Reservation Disposal	___open dump surface ___Cleaned Up ___properly managed ___improvements needed
_____ Collection System to on-Reservation Transfer Station	___open dump surface ___Cleaned Up ___properly managed ___improvements needed
_____ Transfer Station Operation	___open dump surface ___Cleaned Up ___properly managed ___improvements needed
_____ Recycling Facility	___open dump surface ___Cleaned Up ___properly managed ___improvements needed
_____ Construction & Demolition Debris Landfill	___buried ___surface ___closed ___active ___cleaned-up ___controlled/properly managed
_____ Other:	___buried ___surface ___closed ___active ___cleaned-up ___controlled/properly managed

SITE CHARACTERISTICS AND PROXIMITY FACTORS

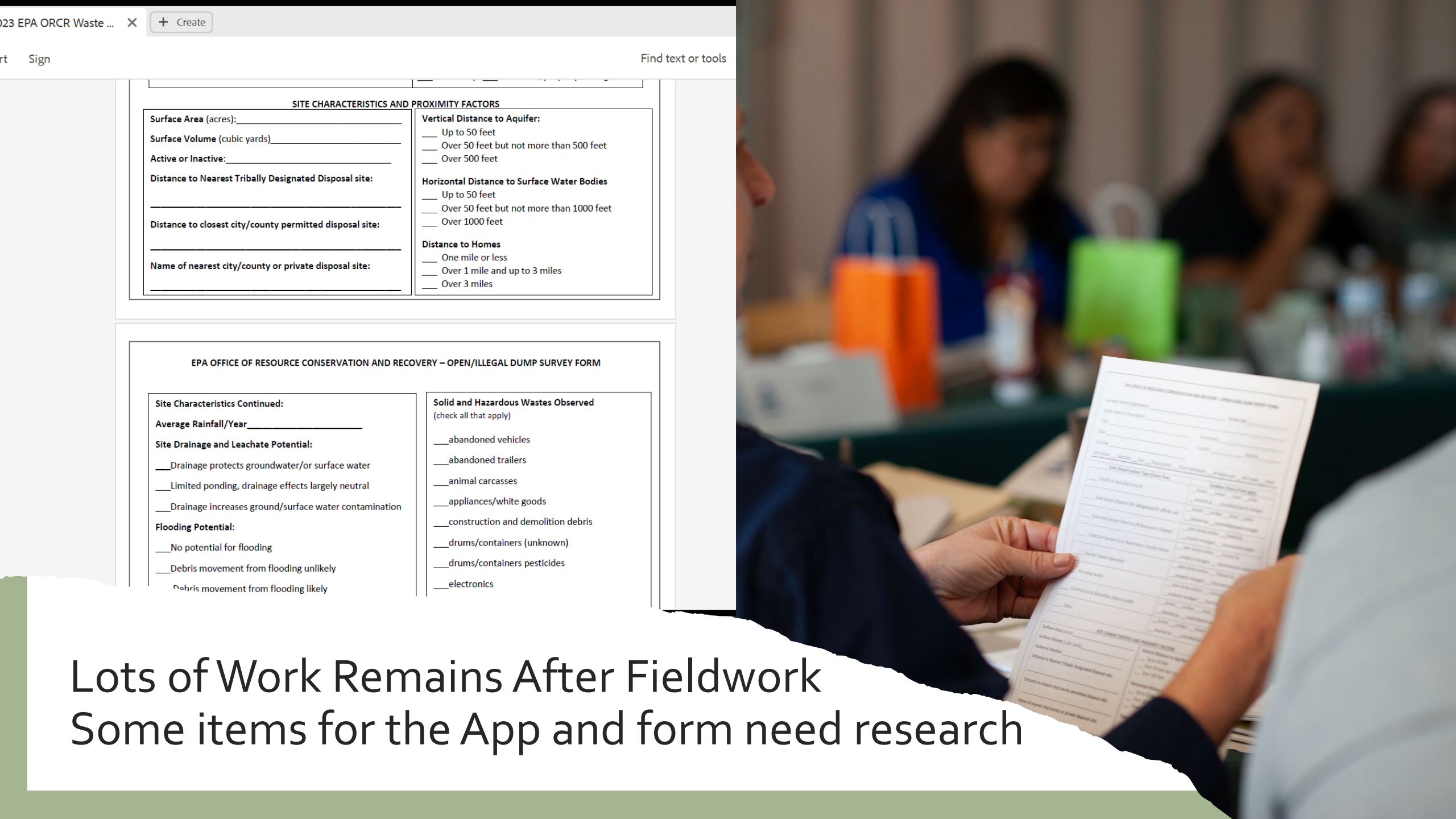
Surface Area (acres):_____ Surface Volume (cubic yards)_____ Active or Inactive:_____ Distance to Nearest Tribally Designated Disposal site: _____ Distance to closest city/county permitted disposal site: _____ Name of nearest city/county or private disposal site: _____	Vertical Distance to Aquifer: ___ Up to 50 feet ___ Over 50 feet but not more than 500 feet ___ Over 500 feet Horizontal Distance to Surface Water Bodies ___ Up to 50 feet ___ Over 50 feet but not more than 1000 feet ___ Over 1000 feet Distance to Homes ___ One mile or less ___ Over 1 mile and up to 3 miles ___ Over 3 miles



PLANNING AHEAD

Pre-Planning included getting familiar with the paper form – which is a mirror of the mobile app for redundancy; identifying priority sites with the tribe before mapping out routes- then mapping out routes based on tribal input; preparing manuals with all routes, training materials, forms, contact sheets and other relevant information.

PART 1 TRAINING: FOCUSED ON TERMINOLOGY, IDENTIFYING WASTE TYPES, SITE CHARACTERISTICS AND PROXIMITY FACTORS.



Lots of Work Remains After Fieldwork
Some items for the App and form need research

TRAINING PART 2

Focused on learning to use the App, both in the classroom and in the field

Shortening Part 1 of the training

Collapsing Categories so fewer items to report

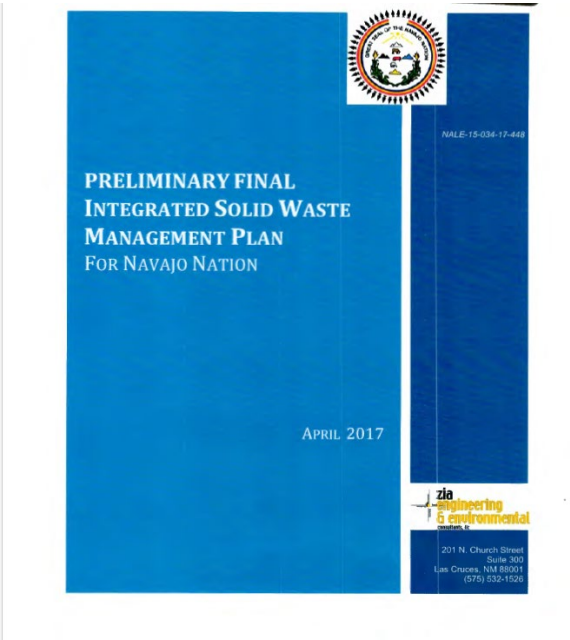
Labeling pictures as taken in case upload doesn't go through

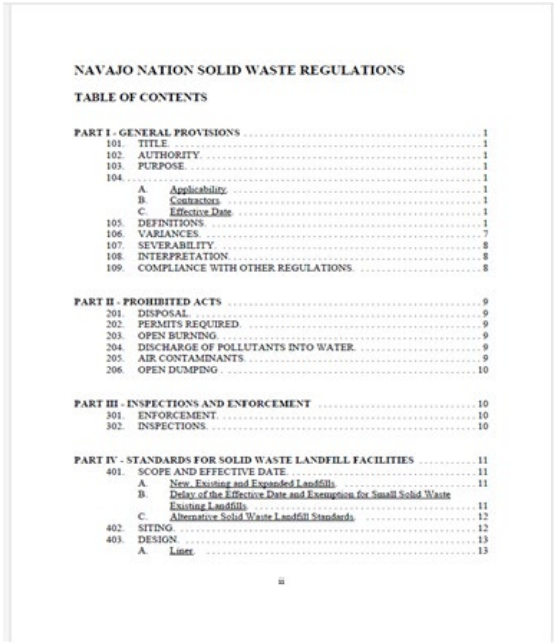
Using percent of waste versus trying to count number of items

Making "off-line" maps more functional for work in remote areas with no signal

Pickups, Jeeps or 4-Wheel Drive Required!

Learning from the Pilot and Adapting





NAVAJO NATION SOLID WASTE REGULATIONS

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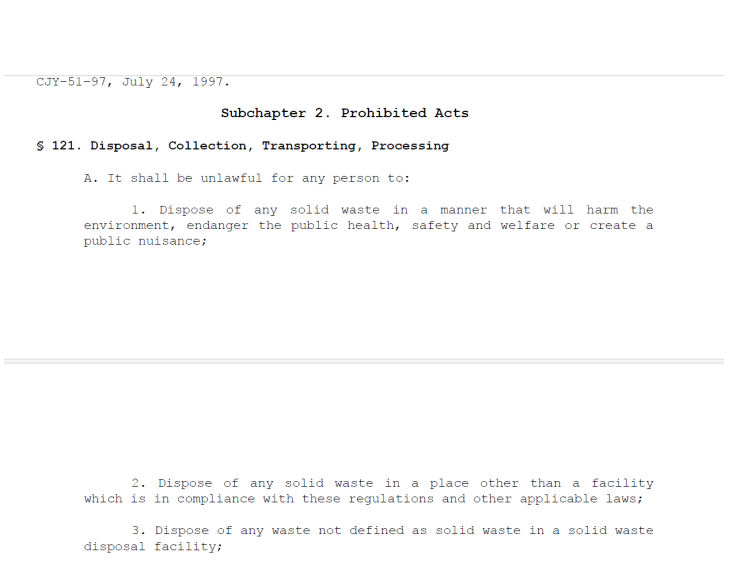


CJY-51-97, July 24, 1997.

Subchapter 2. Prohibited Acts

§ 121. Disposal, Collection, Transporting, Processing

A. It shall be unlawful for any person to:

1. Dispose of any solid waste in a manner that will harm the environment, endanger the public health, safety and welfare or create a public nuisance;

2. Dispose of any solid waste in a place other than a facility which is in compliance with these regulations and other applicable laws;

3. Dispose of any waste not defined as solid waste in a solid waste disposal facility;

An integrated waste management plan is required for a cleanup to be funded by IHS

It is also a best practice to ensure codes/ordinances address waste and are enforceable

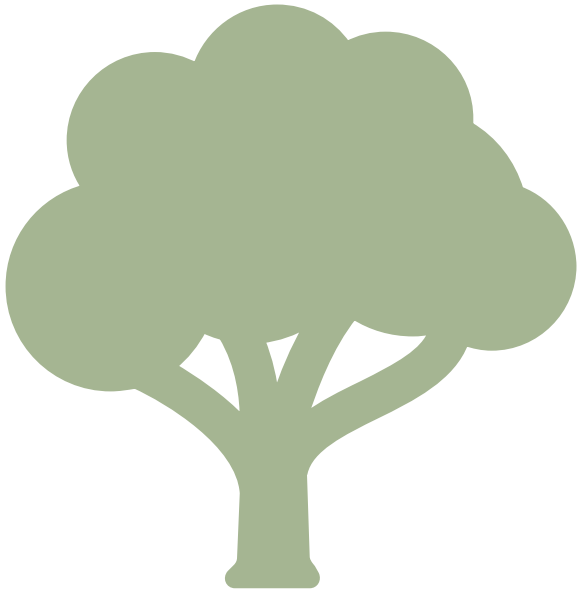
Final Thoughts on Open Dumps

Work closely with IHS Area Offices and EPA Regional Coordinators

Update your IWMP as needed and ensure you have adequate enforceable codes in place

The cycle to get to a fundable project is long, so don't delay getting started

Identify funding opportunities that supplement your cleanup efforts



TRIBAL SOLID WASTE OPERATIONS AND MAINTENANCE

- Defining Operations and Maintenance
- O&M Needs Assessment Process
- Tribal input to needs assessment
- Conclusion and feedback session

What Do We Mean by O&M

- Components of "operations"
  - Labor: day-to-day labor for residential waste collection, handling at transfer station or other consolidation points, transportation to final disposal, cleaning, administration
  - Direct costs: Equipment, fuel for trucks, electricity/water for facilities, etc
  - Disposal fees
- Components of "maintenance"
  - Maintenance extends the life cycle of facilities and equipment and protects past investments
  - Costs of warranties
  - Replacement parts
  - Repairs & Services

Operational Considerations

- Collection operations:
  - drop off centers where residents bring their waste to central points designated by you
  - maintaining a fleet of vehicles and routing collection trucks to pick up residential waste at the curb
  - Contracting with waste collectors to provide services
- Handling operations: Transfer stations, MRFs, and drop off locations
  - Segregation of materials
  - Consolidation of volume prior to transport to final disposal location
  - Roll-offs or dumpsters filled by residents directly that are then hauled to disposal points
- Both have costs to properly operate. Both should be backed up by aggressive marketing and education as well as codes and ordinances

Walker River Paiute Tribe May 2022

Developing a National Tribal O&M Needs Assessment

What is a Needs Assessment?

- Identifying and evaluating current and future needs for waste management O&M
- Involves collecting data on the conditions and performance of waste management programs

What will the Needs Assessment yield?

- Allow EPA to identify barriers to success and funding gaps
- Allow EPA/partner agencies to make a data-backed request to create a dedicated funding source

Blackfeet Nation transfer station October 2022

PROVIDING INPUT

Tribal Input is a Top Priority:

- Identify the needs, preferences, and challenges of tribal communities
- Ensures that the solutions are culturally appropriate, feasible, and sustainable

Methods:

- Surveys, webinars, meetings, site visits, etc.
- Direct outreach to tribes; outreach to tribal groups: TWAR, NTC, etc.

What kind of feedback is needed:

- National tribal O&M needs assessment and the multi-agency collaboration vision
- Understand the current situation, the gaps and barriers, and the potential solutions