



# Assisting Tribes in Submitting Data to the National Emission Inventory (NEI), Challenges and Successes



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# ITEP's NEI Project

- Purpose:

- Get tribal EI data into the 1999 NEI, version 3

- Started September 2001

- Funded by U.S. EPA Office of Air Quality Planning and Standards (OAQPS) and the Tribal Data Development Working Group (TDDWG) of the Western Regional Air Partnership (WRAP)

# ITEP's NEI Project: Background

- ITEP information suggested up to **50 tribes** had completed EIs in the US at end of 2001.
- At end of 2001, **one tribe** had submitted data to NEI (Robinson Rancheria, CA)
- EPA's OAQPS initiated this project with ITEP to give tribes assistance in submitting their data to the 1999 NEI.



# ITEP's NEI Project: Background

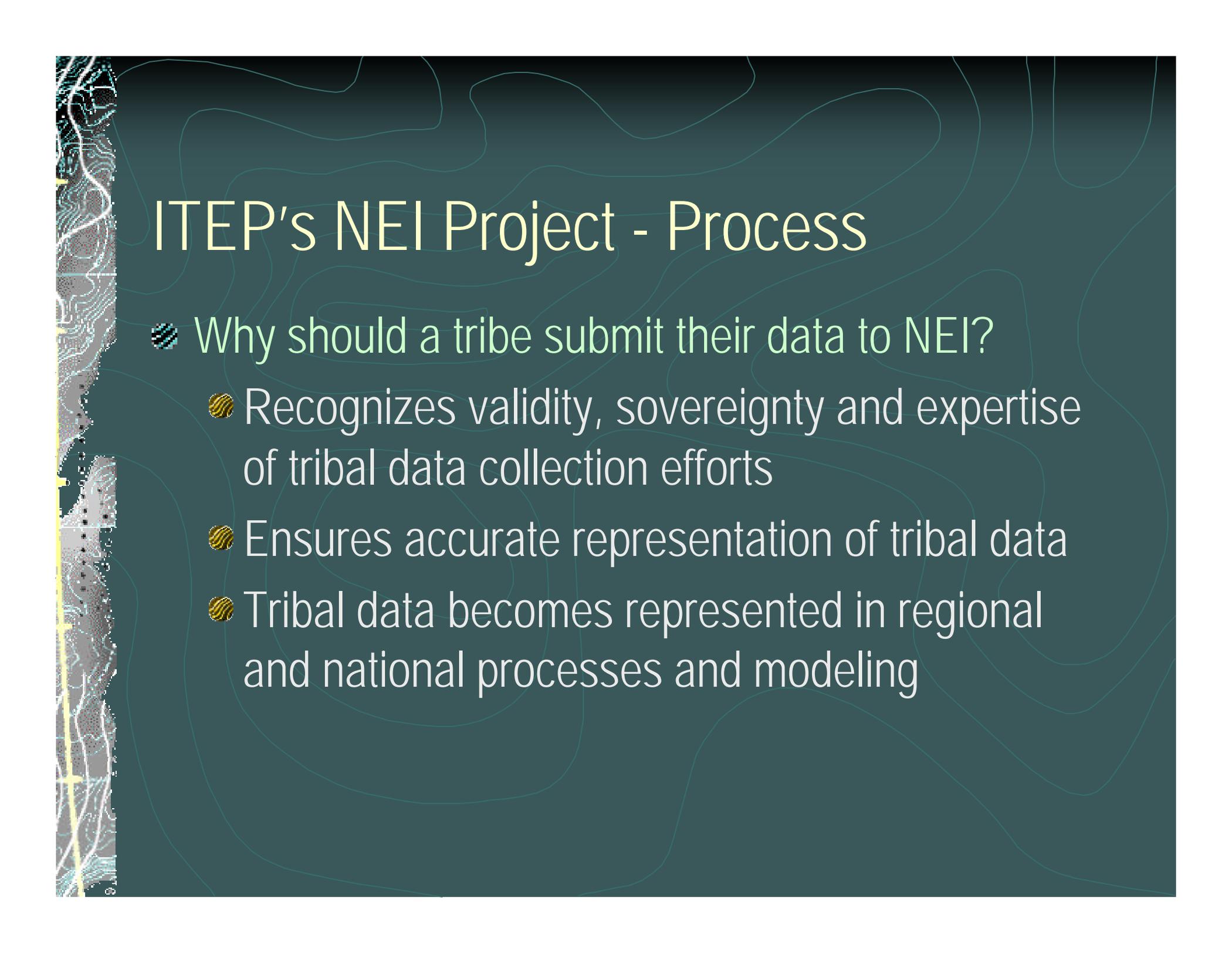
- TDDWG provided continuing funding to focus on western tribes and smaller sources.
- All tribal EI data developed **after 1996** eligible for inclusion
- **Project complete in June-October 2002**

In late September 2001, sent letters to 70 tribes, inviting their participation.

EPA Region	Number of Tribes may have EIs
1	3
2	2
4	2
5	5
6	15
7	0
8	16
9	21
10	6

# ITEP's NEI Project - Process

- 2 letters sent to each tribe
  - 1 to air program manager/employee
  - 1 to tribal council or leader
- Sent NEI fact sheet – How tribe benefits from releasing data
- Data release form to be signed by tribal council or administrator
  - Tribe acknowledges data will become public
  - Tribe releases data to ITEP and NEI



# ITEP's NEI Project - Process

- Why should a tribe submit their data to NEI?
  - Recognizes validity, sovereignty and expertise of tribal data collection efforts
  - Ensures accurate representation of tribal data
  - Tribal data becomes represented in regional and national processes and modeling



# ITEP's NEI Project - Process

Once a tribe releases their data for this project:

- ITEP conducts quality check
  - Estimates made using EPA guidance/methods?
  - Randomly check calculations for errors
- ITEP checks for inclusion of data mandatory to NEI
  - Works with tribe to obtain missing mandatory data

# ITEP's NEI Project - Process

## Code, summarize, and submit data to NEI

- ITEP converted data to NEI table format
- Copy of encoded data and summary report sent to tribal air staff for final review
  - Review tables contained explanation of NEI codes
  - Summary report on ITEP's data collection and conversion work
- Tribal air staff give final verbal approval of encoded data
- ITEP submits data to NEI, via CDX, in tribe's name.

# ITEP's NEI Project -Results

**As of March 29, 2002, five tribes have released their inventories for the project:**

- Pueblo of Laguna
- Mississippi Band of Choctaw Indians
- Gila River Indian Community
- Salt River Pima-Maricopa Indian Community
- Ute Mountain Ute Tribe

# ITEP's NEI Project – Results

- 70 tribes invited to participate
  - 19 had not actually completed an EI
  - 5 confirmed EI older than 1996
  - 5 tribes did not want their data to become public/had data sensitivity concerns
  - Unable to contact 15 tribes.
  - 4 tribes have only preliminary EI data
  - 3 tribes don't have time/staff to respond to request
  - Remainder of tribes (14) waiting for council and/or legal review.

(As of March 2002)

# ITEP's NEI Project -Results

## Point Sources found on tribal lands:

- Natural gas compressor stations
- Communications equip. manufacturing facility
- Sand and gravel pits
- Solid waste landfills
- Asphalt operations
- Concrete operations
- Aluminum processing facility
- Medical waste incinerator
- Cotton gin
- Copper wire recycler

Based on five tribal EIs released as of March 2002

# ITEP's NEI Project - Results

## Area Sources found on tribal lands:

- LPG combustion
- Diesel combustion
- Wood combustion
- Agricultural activities
- Solvent use
- Fires (structures, vehicles, etc.)
- Forest fires (prescribed & wildfire)
- Gasoline service stations
- Construction activities
- Oil and gas exploration & production
- Open burning of solid waste

Based on five tribal EIs released as of March 2002

# ITEP's NEI Project -Results

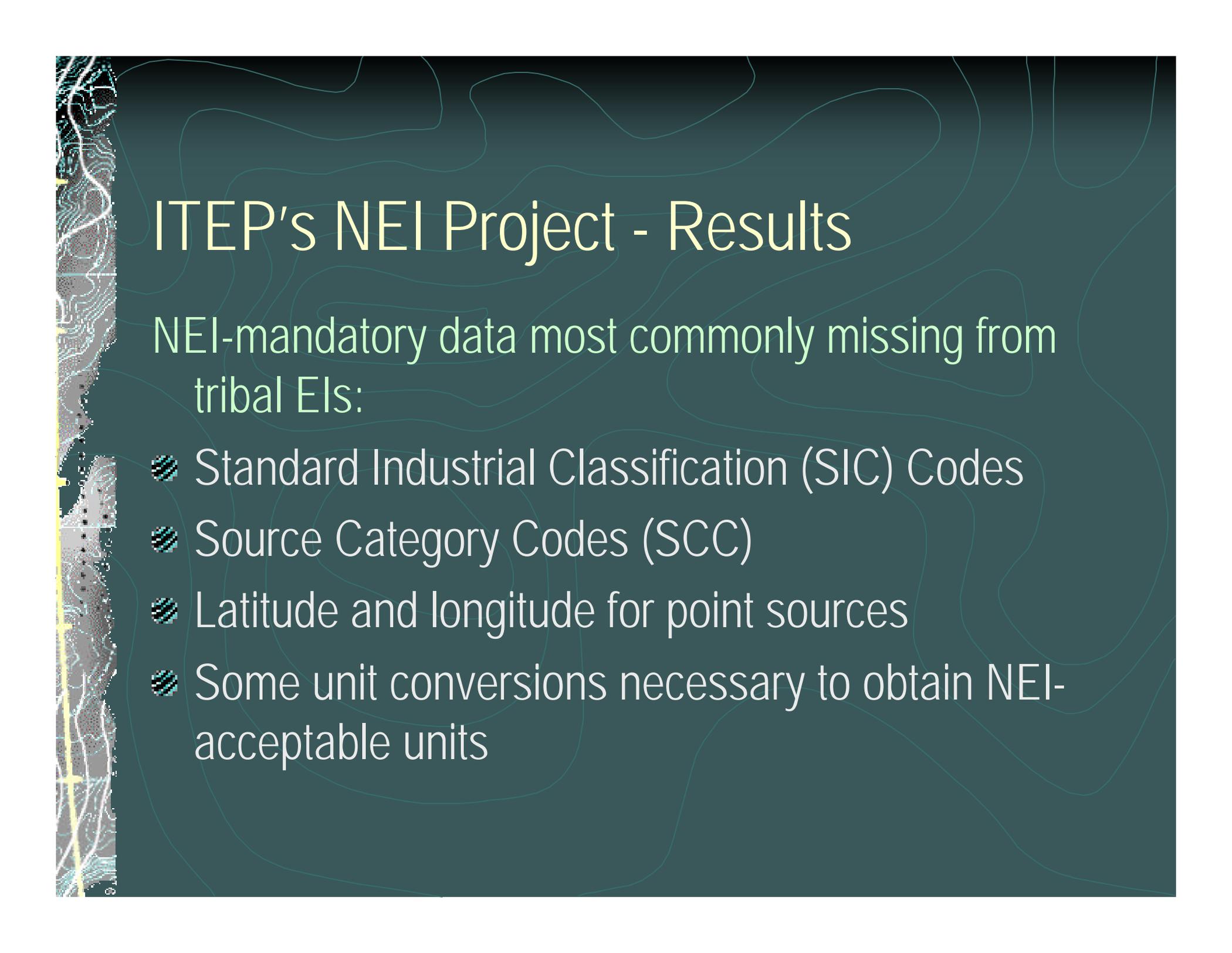
## ● Mobile Sources on tribal lands:

- Local paved and unpaved roads
- State highways
- Interstates/Freeways

## ● Non-Road Mobile Sources on tribal lands:

- Railroads
- Agricultural tractors
- Lawn and garden equipment

Based on five tribal EIs released as of March 2002



# ITEP's NEI Project - Results

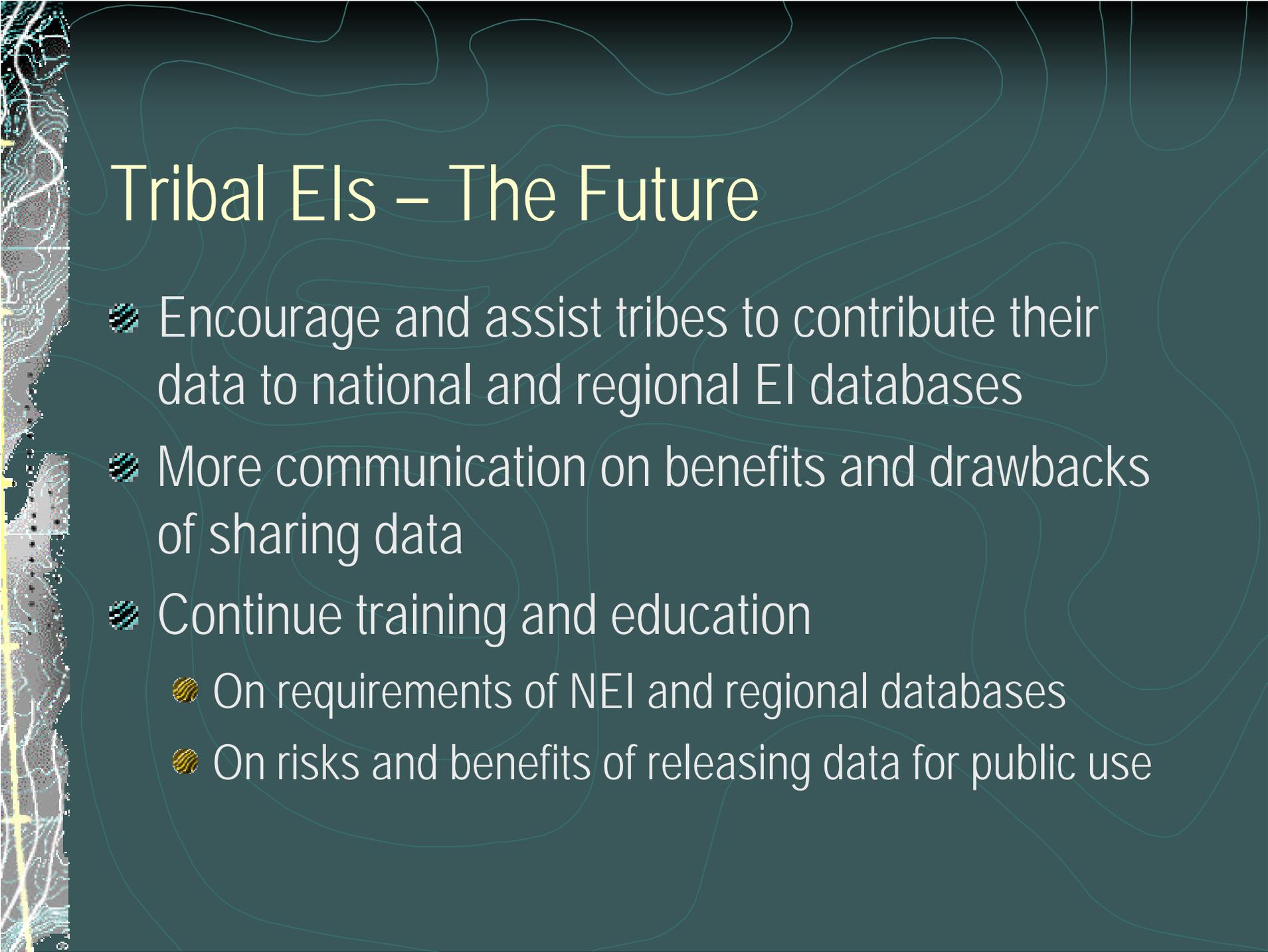
NEI-mandatory data most commonly missing from tribal EIs:

- Standard Industrial Classification (SIC) Codes
- Source Category Codes (SCC)
- Latitude and longitude for point sources
- Some unit conversions necessary to obtain NEI-acceptable units



# Tribal EIs – The Future

- Enable more tribes to complete EIs for their lands
  - In 1990, less than 5 tribes had EIs
  - In 2001, at least 35 tribes had EIs
  - Must continue this rate of increase
  - Work in WRAP region indicates large demand for tribal EIs, 77 tribes indicate plans to complete EIs in near future



# Tribal EIs – The Future

- Encourage and assist tribes to contribute their data to national and regional EI databases
- More communication on benefits and drawbacks of sharing data
- Continue training and education
  - On requirements of NEI and regional databases
  - On risks and benefits of releasing data for public use

# ITEP's NEI Project - Conclusions

- Providing assistance in contributing to NEI is valuable service to tribes.
- US EPA and Regional Planning Organizations must be made aware of the amount of time required to obtain release of tribal data.
- Limited staff in tribal environmental programs remains a hurdle in developing and obtaining release of tribal data.