



Tier 2 – Enhancing a Tribal Response Program

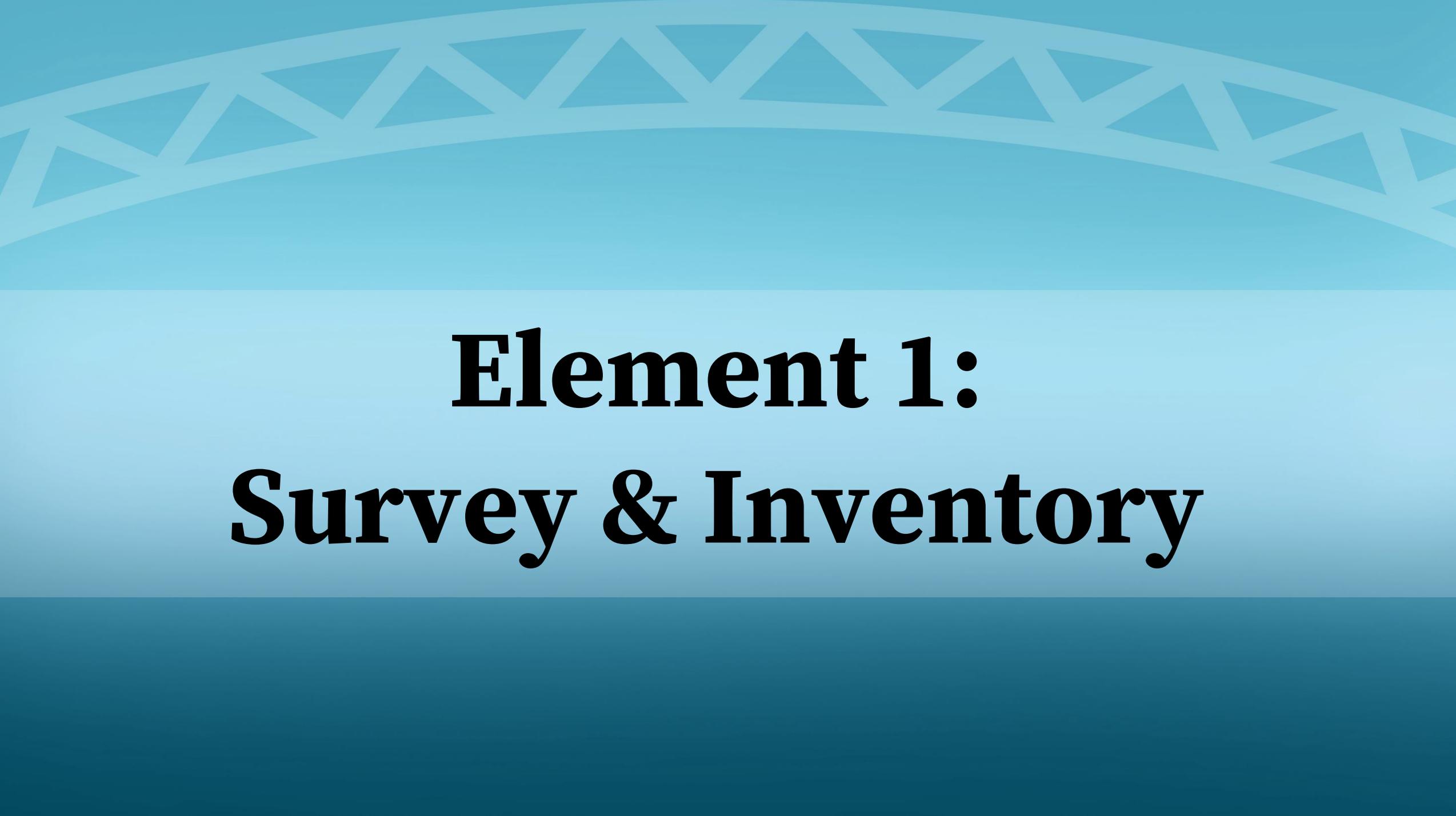
Module 2: Enhancing the Four Elements

Ideas on how to take your TRP program and the Four Elements beyond the basics and to the next level

TribalTAB.org

KANSAS STATE
UNIVERSITY





Element 1: Survey & Inventory

Element 1: Survey & Inventory

- ❖ Has your perspective changed on what is a “brownfield” on your Tribal lands?
- ❖ Have you revisited known sites or other sources of information?
- ❖ Have you researched ALL available information?
- ❖ Have you “enhanced” your site information?



Sources of Brownfields Information

- ❖ Field survey or Tribal lands (go look again!)
- ❖ Have you updated your sources of data or information?
- ❖ Review of existing inventories, reports, or databases such as:
 - UST/LUST inventories
 - Open Dump Surveys (IHS, EPA)
 - Abandoned mine inventory (states, USGS)
- ❖ Insurance maps
- ❖ Old topographic and soil survey maps and aerial photos



Sources of Brownfields Information

- ❖ Latest EPA and other federal agencies databases
- ❖ RCRA treatment, storage, & disposal facility lists
- ❖ US EPA CERCLA/Superfund PA & RI/FS Reports
- ❖ Oil & gas well or mine site inventories (BLM, USGS, state)
- ❖ State brownfield inventory or databases
- ❖ Near-by county/community brownfield or contaminated sites inventories



Sources of Brownfields Information

- ❖ Interview of former workers and maintenance staff of potential brownfields buildings to obtain historical and maintenance information on specific sites
- ❖ Reports from community members (verbal, written, internet)
- ❖ Use of Tribal/BIA GIS and mapping records
- ❖ Tribal Land/Property office: newly abandoned properties or potential future Tribal acquisitions



Interview Elders & other community members (Manokotak, Alaska)



Inventory of brownfields in remote areas can require significant time & effort



Increase detail of site information

- ❖ Use a detailed Site Inventory Checklist
 - Based upon a Phase I Assessment Checklist
 - Or BIA *Pre-acquisition Environmental Assessment For Federal Land Transactions*

(TRIBE) Environmental Department Brownfields & Tribal Response Program Site Inventory Information Sheet	
Date: Updated:	Site Name
Form completed by:	
Directions to site:	
Site Description:	
Address: (county/state):	
Lat/Long:	
Township/Range/Section:	
Parcel/Allotment Number(s):	
Current Property Status/Owner: Tribal ___ Trust ___ Fee ___ Federal ___ Other ___	
Current Use of Property:	
Future Use of Property:	
Neighborhood: ___ Residential ___ Industrial ___ Rural ___ Other	
Site & Vicinity general characteristics: (terrain, elevation, general land use in area, vegetation, location to nearest town)	
Physical setting:	
Geologic Information: -geological formations/thickness -bedrock name/depth -faults/structural features -(within 4 miles)	
Hydraulic Information: -depth to groundwater -aquifers under site -hydraulic conductivity -confined/unconfined -recharge area -interconnections	
Hydrology: -surface water flow direction -annual mean discharge rate of surface water -drainage area up-gradient of site -floodplain information -wetlands or water bodies	
Historical Information:	
Property use Past/Present:	
Previous owner:	
Potential environmental threats:	



Consider using BiT as your Database

BiT Brownfields Inventory Tool

► www.tab-bit.org

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BENEFITS OF BiT

- Free and user friendly
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www.ksutab.org/tools

TAB E-Tools
www.ksutab.org/tools



TAB EZ: etools.ksutab.org/tools/tabez
BiT: www.tab-bit.org

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Prioritization of Sites

- ❖ Do you have a prioritization process for site work?
- ❖ Does it need to be reviewed, updated, or revised?
- ❖ Is the community involved in that process?
- ❖ Does it reflect new or changing issues or concerns?
- ❖ Have you included ALL parts of the community?



Prioritizing Brownfield Sites for Further Action: A Subjective Points system example

Ranking Factor	1	2	3	4	5	Total Points
Human Exposure	Contamination pathways have no direct impact on any population.	Contamination pathways have potential to affect human recreational activities.	Contamination pathways have the potential to affect employee population.	Contamination pathways have the potential to affect a small residential population.	Contamination pathways have the potential to affect an entire residential population.	
Environmental Exposure	Site not located near environmentally sensitive areas.	Site located within a mile of an environmentally sensitive area.	Site located within a ½ mile of an environmentally sensitive area.	Site located within environmentally sensitive area.	Site located immediately in environmentally sensitive area (RECs)	
Ecological Exposure	No exposure to endangered or threatened species habitat areas.	Potential exposure to endangered or threatened species habitat areas.	Potential exposure to critical habitats of endangered or threatened species habitat areas.	Actual known releases of hazardous substances in endangered or threatened species habitat areas.	Actual known releases of hazardous substances in critical area of endangered or threatened species habitat areas.	
Cultural Sensitive Area	Potential area not located within a culturally significant area.	Potential area within a 5mile radius of a cultural significant area.	Potential area within a 1mile radius of a cultural significant area.	Potential area adjacent to a cultural significant area.	Potential area in immediate cultural significant area.	
Potential for Beneficial Site Redevelopment	No site development.	Low likelihood of site redevelopment.	Moderate potential for redevelopment.	High potential for site redevelopment.	Redevelopment plan ready, waiting for site to be re-mediated to begin redevelopment.	
Creation of Jobs	No increase of jobs.	1 to 5 new jobs created.	5 to 10 new jobs created.	10 to 20 new jobs created.	More than 20 jobs created.	
Land Ownership Status	Allotted Land	Fee Land within boundaries of Reservation (Tribal Land taken out of trust).	State Land (school sections)	Sub marginal Lands (purchased land outside of reservation boundaries)	Tribal Owned/Reserve (Held in trust for tribal Government)	
Total Cumulative Points						



A More Quantitative Points System example

Insert points for all factors that apply	
Factors	Points
Potential Human Exposure to contaminant(s) – if residential (5-points)	
Potential Human Exposure to contaminant(s) – if worker (3-points)	
Potential Human Exposure to contaminant(s) – if recreational (3-points)	
Potential ecological exposure to contaminant(s) (5-points)	
High toxicity potential to humans (5-points)	
Medium toxicity potential to humans (4-points)	
Low toxicity potential to humans (3-points)	
High potential for reuse (5-points)	
Medium potential for reuse (3-points)	
Low potential for reuse (1-points)	
No potential for reuse (0-points)	
Reuse creates many jobs (5-points)	
Reuse creates some jobs (3-points)	
Reuse creates no jobs (0-points)	
Mitigation costs low (5-points)	
Mitigation costs medium (3-points)	
Mitigation costs high (1-points)	
Funding identified (5-points)	
Partial funding identified (3-points)	
Existing utilities (1-3 points)	
Cultural considerations (5-points)	
Reuse creates public amenities (5-points)	
Removes eyesore (1-point)	
Located near disadvantage community (1-point)	
Tribal Council/Administration designates site a high priority (5-points)	
Total Points	



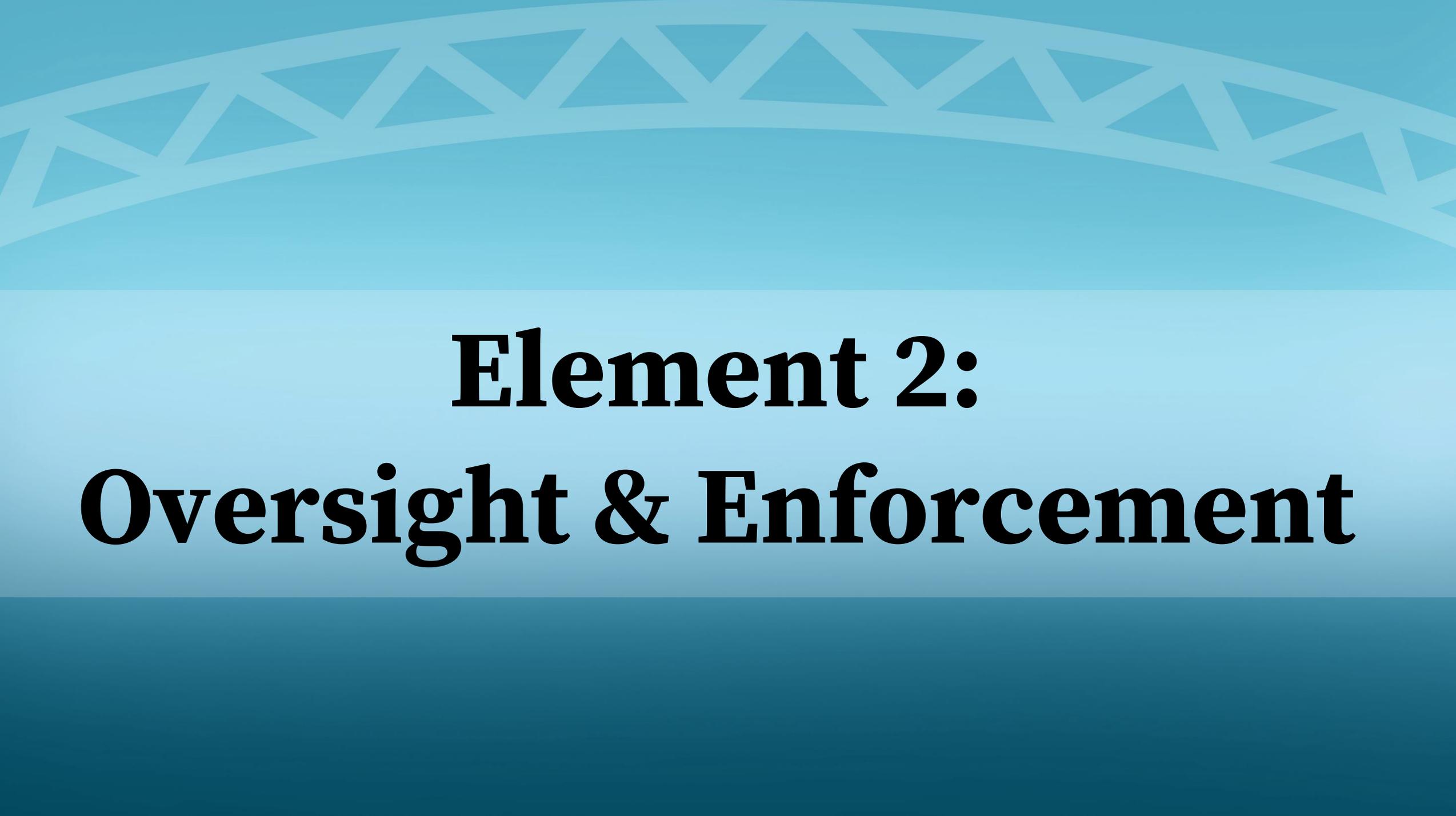


Click to play video, which will open in YouTube.

Video 2.1: Prioritization of Sites

Sherry Bishop

Ft. Belknap Indian Community, MT



Element 2:
Oversight & Enforcement

Element 2: Tribal Response Role

This element has two parts:

- ❖ Development of oversight and enforcement authorities or other mechanisms and resources

And

- ❖ Ensuring that response actions or cleanups conducted under this program are adequate and completed



“Other Mechanisms”

Element 2 mentions the use of “other mechanisms, and resources”. These may be other authorities or resources that could be brought to bear on a situation to ensure that a party meets their obligations. This could include the authority or resources of another Tribal program or a state or federal agency.

(See Tier II Module 3 for more information on this topic)



Tribal Response Program Enforcement

U.S. EPA:

Eligible grant activities include, but are not limited to, development of legislation, regulations, procedures, ordinances, guidance, etc. that would establish or enhance the administrative and legal structure of their response programs.*

** Consult US EPA Guidance and the Region for specific activities*





Click to play video, which will open in YouTube.

Video 2.2: TRP Oversight & Enforcement
Shawn Lahr
Blackfeet Tribe, MT

Tribal Civil Enforcement

- ❖ Do you need to develop more civil compliance and enforcement authorities, policies, and procedures for the response program?
- ❖ Are there still gaps in the Tribal laws, codes, and ordinances or new issues to be addressed?
- ❖ Do you need more compliance and enforcement training?





[Click to play video, which will open in YouTube.](#)

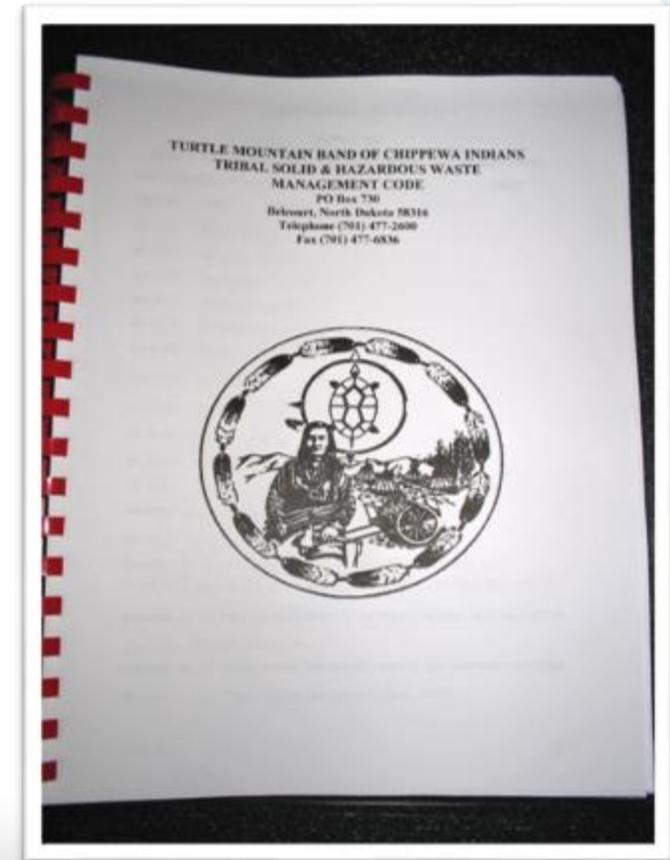
Video 2.3: Enforcement **Sherry Bishop**

Ft. Belknap Indian Community, MT

Tribal Laws & Codes

Tribal Solid & Hazard Waste Laws/Codes may include Tribal Response Program requirements such as:

- ❖ Prohibition of dumping or illegal releases
- ❖ Responses to releases
- ❖ Oversight of responses
- ❖ Conducting responses
- ❖ Cleanup Approval & Standards
- ❖ Verification & Certification
- ❖ Institutional Controls
- ❖ Public Participation
- ❖ Tribal Permits & Fees



New or Amended EPA Laws and Regulations

New Federal or State laws and regulations. may need to be considered and perhaps added to Tribal laws & codes (e.g., EPA Lead Paint Rules).

On April 22, 2008, EPA published a final rule under the authority of §402(c)(3) of the Toxic Substances Control Act (TSCA) to address lead-based paint hazards created by renovation, repair, and painting activities that disturb lead-based paint in “target housing” and “child-occupied facilities.”

EPA “Hazardous Substances, Pollutants or Contaminants” can be modified over time and include new things that would be applicable under the CERCLA 128(a) Tribal Response Program.



Standard Operating Procedures

Do you need improved internal procedures, policies, and protocols needed to implement Tribal laws, codes, and ordinances?

Some Tribes have developed Enforcement SOPs for:

- ❖ Investigation of dumping/spills
- ❖ Penalty policies for violations of Tribal codes/laws
- ❖ Response to emergencies
- ❖ Coordination with other Tribal programs, as well as State and Federal agencies



Tribal Cleanup Process

Has your Tribe developed a model cleanup plan and process (SOP) that can be imposed and enforced when a cleanup is conducted under Tribal authority and jurisdiction?

This can also be addressed under Element Four



Enforcement & Oversight in rural or remote areas and climates can require specific equipment



Equipment Needs

To conduct effective oversight, you may need:

- ❖ Communications equipment
- ❖ Camera or GPS
- ❖ Drones
- ❖ Field gear/clothing
- ❖ Safety gear/clothing
- ❖ Computer equipment or software
- ❖ Technical guidance or manuals
- ❖ Sampling or testing equipment/capabilities
- ❖ Secure locking Equipment cabinet



QAPPs

- ❖ Has your Tribe developed any model or generic Quality Assurance Project Plans (QAPPs) for common contaminants?
- ❖ This can reduce time and costs in the future
- ❖ Some types of sites and contaminants are encountered repeatedly, such as:
 - Asbestos
 - Lead paint
 - Petroleum releases from USTs
 - Others



Data Management & Quality

- ❖ Has your Tribe developed a Data Quality Management Plan? This can include:
 - Tribal roles and responsibilities
 - Data format & reporting requirements
 - Technical & other information requirements
 - Internal and external (EPA) review steps
 - Filing and record keeping



Learning Opportunities

Have you taken advantage of learning from others?

- ❖ Assisting US EPA/State staff in planning and conducting cleanups under RCRA, CERCLA, and LUST
- ❖ Review and comment on cleanup plans developed by other federal and state agencies (e.g., Army COE, DOD, DOE)
- ❖ Accompany and/or oversee a contractor that is conducting an assessment or a cleanup
- ❖ Visit and shadow experienced staff at another Tribe



BiT includes Compliance & Enforcement Tracking!

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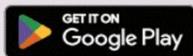
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Tribal Cleanup Funding

Has your Tribe explored means to establish a Tribal emergency or environmental response fund?

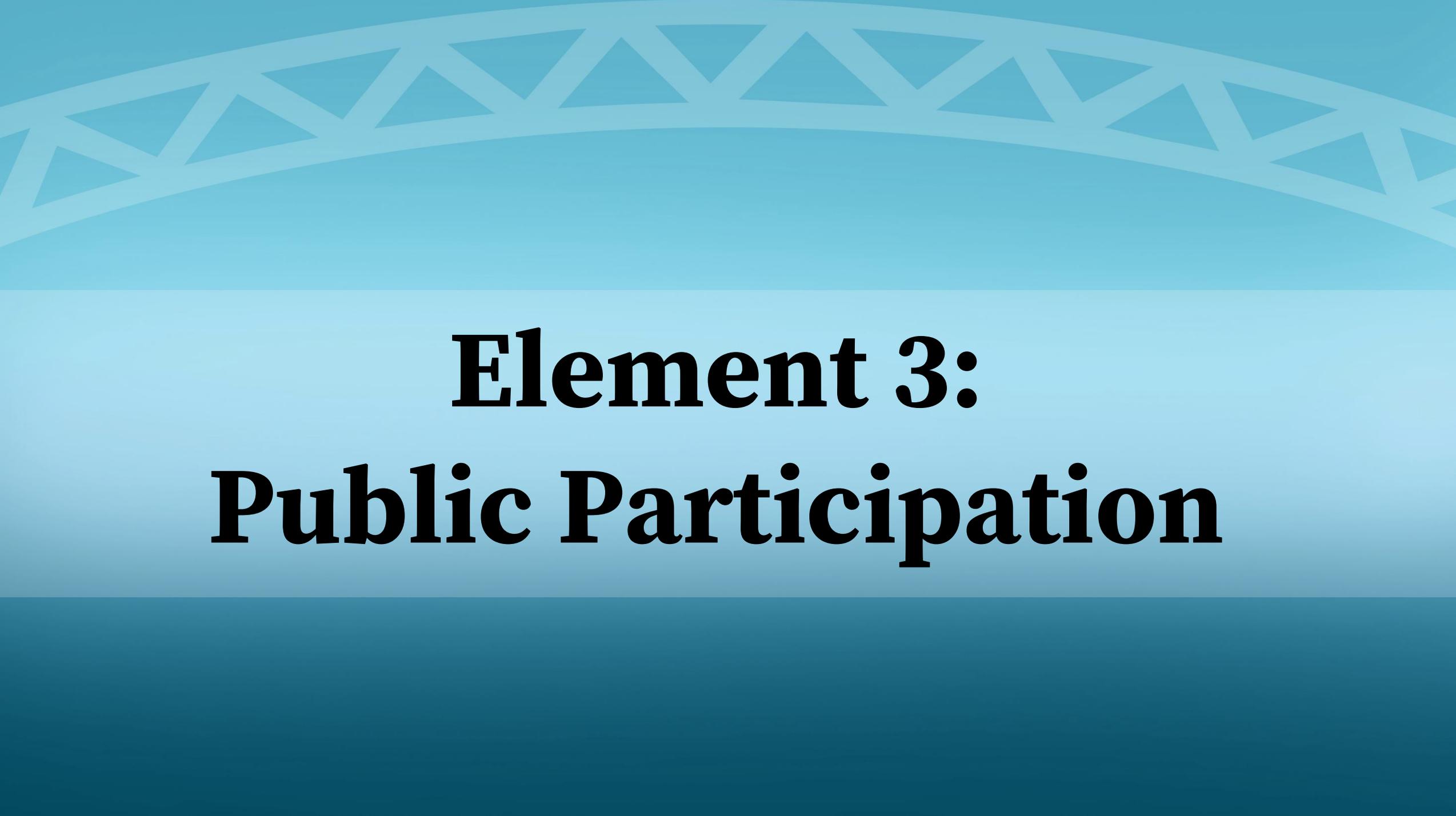
- ❖ Share of Tribal Permit fees
- ❖ Contract fees (e.g., 1% of total major construction or demolition contract or solid waste management permit fee)
- ❖ Oversight/review fees
- ❖ Funds from environmental fines
- ❖ Other





[Click to play video, which will open in YouTube.](#)

Video 2.4: Tribal Codes and Enforcement
LaDonna Tamakawastewin Allard
Standing Rock Sioux Tribe, ND/SD



**Element 3:
Public Participation**

It does not have to be scary.



And it can be fun!



Three Key Parts:

“Mechanisms and resources to provide meaningful opportunities for public participation”, including:

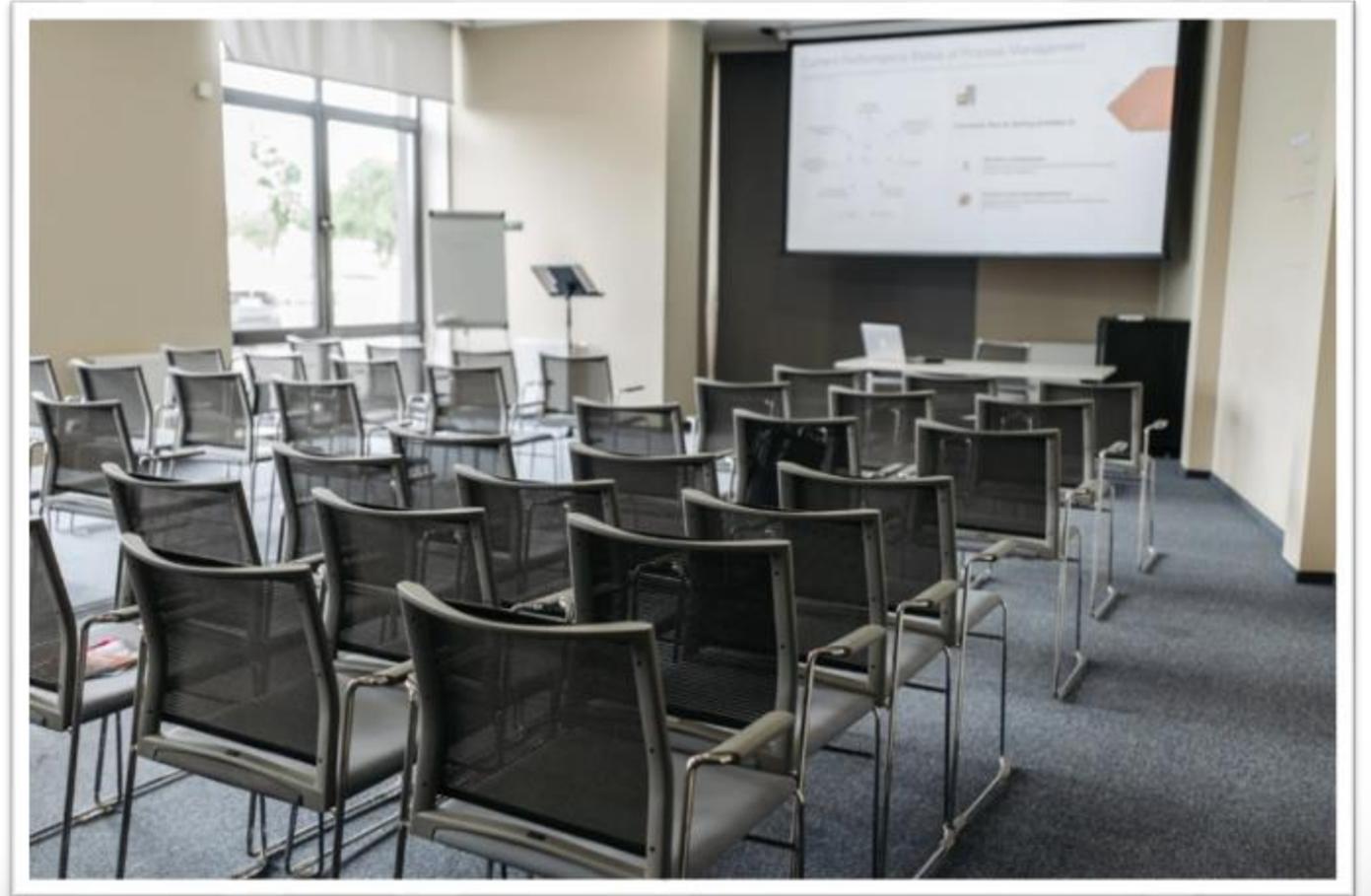
- ❖ Public access to documents
- ❖ Prior notice and opportunity for comment on proposed cleanup plans and site activities
- ❖ A mechanism by which a person may request the conduct of a site assessment



Public Meetings

Having problems getting the community to attend your public meetings?

Talk to other Tribes and coordinators about how they promote & conduct community meetings.



Go to Other Meetings

Meet the community where they are instead of hosting another meeting. Examples may include:

- ❖ Elders Society
- ❖ Veterans Society
- ❖ Schools
- ❖ Tribal committees
- ❖ Community meetings
- ❖ Public events
- ❖ Local business or Chamber of Commerce
- ❖ Other Tribal program meetings

Always have a poster, display, or presentation ready to go.



Combining Efforts

Combine public meetings or forums with other agencies and/or programs:

- ❖ Other Tribal programs
- ❖ Local community or civic groups
- ❖ Local events or conferences
- ❖ EPA meetings for Superfund, UST/LUST
- ❖ Other Federal agencies





Click to play video, which will open in YouTube.

Video 2.5: Coordination Needed for Cleanups
Sherry Bishop
Ft. Belknap Indian Community, MT

Public Access

Public access to remediation plans, reports, and decision documents is important.

- ❖ Can you increase the public knowledge about the access to information?
- ❖ Have you checked the documents lately?
- ❖ Can you conduct site visits or tours (safely)?
- ❖ Do you need translations?
- ❖ Eliminate false information and rumors.





[Click to play video, which will open in YouTube.](#)

Video 2.6: Use of Traditional Languages

Lyle Gwin

Three Affiliated Tribes, Fort Berthold, ND

Using Traditional Language

Three Affiliated Tribes Brownfields Brochure

**Tribal Response Program/Brownfield
Three Affiliated Tribes
Environmental Division**

hunaanú' kUššINaseéNU ti-
raawaaruuxtii

šikaakatuúteeRI t atsú tiwaaraarux-
tii

tuxtaaNA'o noohunaačituú'

ti-NAhuná-sA wekaakIhuNAhAs

English Translation

1. This land of ours is sacred!
2. Even though the sacredness is not visible.
3. Have respect for everything
4. The earth is the only thing that lives for ever!



Assist Other Agencies?

The Tribe is strongly encouraged to provide public access to all relevant documents for a response action conducted only under federal jurisdiction (i.e., Superfund, RCRA, LUST or DoD/USACE FUDS) or by the state through the TRP office.

Also, you might assist Tribal members in understanding what is in the documents. Provide non-technical information and explanations of technical documents.



Internet Outreach

Websites

- ❖ How old is your website?
- ❖ Is it up to date?
- ❖ Is it user-friendly? Is it too complex or slow?
- ❖ How difficult is it to add or remove information?
- ❖ Can you receive feedback or reports from the community?

Social Media

- ❖ Which platforms are your target audience (community) using?
- ❖ How frequently will you post or share information?
- ❖ How do you engage with community on social media?





Click to play video, which will open in YouTube.

Video 2.7: Using a Tribal Website

Sherry Bishop

Three Affiliated Tribes, Fort Berthold, ND

Tribal Officials

- ❖ Do you have a process to keep elected officials informed?
- ❖ Do you have a process in place to brief and inform newly elected officials?
- ❖ Do you need to develop a briefing package or presentation on what the program has accomplished and is planning?



Make it Understandable

- ❖ Does your brownfield assessment or cleanup contract include having the contractor attending public meetings?
- ❖ Can you provide a “layman’s” version or non-technical summary of a technical report?
- ❖ Need training or assistance with development of presentations, pictures, or graphics for public presentations or brochures?
- ❖ TRP training materials can be copied and used from the Tribal TAB website.



Requests for Site Assessments

- ❖ Are you getting any requests?
 - If not, why not?
- ❖ Did a request result in a new site in your inventory and/or an assessment or cleanup?
- ❖ If a request has resulted in an assessment and/or cleanup does the requestor/community know it?
- ❖ Always provide feedback to persons making a request or providing information.



Community Visioning

Have you considered conducting a Community Visioning Process to involve the community in development of a vision for the future reuse of a Brownfields site? (They are also called a “charette”)

There are several sources of “Visioning Teams” that facilitate a meeting and provide artist to illustrate the “Vision”. (consult US EPA or Tribal TAB)



Increase Community Involvement

Community Visioning
Meeting - Turtle Mtn. Band of
Chippewa, ND



Turtle Mountain Tribal Vision: Wellness Center



From this - To this





**Element 4: Approval, Verification,
and Certification of Cleanup**

Tribal Cleanup Process

Has your Tribe developed a model cleanup process that meets your needs? (a SOP?)

To include:

- ❖ Cleanup Plan format & content requirements
- ❖ Technical & other information requirements
- ❖ Public notice/participation requirements
- ❖ Review steps and all parties/agencies involved

Do you understand the EPA and/or state process?



Who will review a cleanup plan?

- ❖ Trained and qualified Tribal staff
- ❖ Qualified Tribal contractor – (contract in place?)
- ❖ US EPA and/or state environmental staff
- ❖ Other qualified government staff (BIA, IHS, BLM, etc.)
- ❖ Qualified local government staff



Need to Hire an Expert?

Hiring a Qualified Environmental Professional (QEP) consultant or other expert (i.e., engineer, chemist, toxicologist, attorney) to assist with the review of cleanup plans and other relevant documents can be a grant fundable cost under 128(a) subject to the approval of the EPA Regional grant manager.

Anticipate your support needs and work with Tribe and EPA on how to access and fund them.



Cleanups by Other Agencies

Review & comment on other relevant state or federal agency cleanup plans:

- ❖ Cleanups planned or occurring within or near Tribal lands or communities?
- ❖ Cleanups that may impact resources utilized by the Tribe or Tribal members?



Cleanup Verification

- ❖ When a response action is completed there needs to be verification by review and/or audit of the action and its' results to ensure that all remediation requirements for a site have been successfully implemented or satisfied.
- ❖ The verification should be conducted by someone that has the expertise and experience to perform the audit of the results and/or conduct verification sampling and testing.



Cleanup Verification

The verification can include:

- ❖ A review and audit of all field reports and data to include all relevant environmental media sampling and analysis results;
- and/or
- ❖ Independent sampling and analysis of relevant environmental media to verify results of the remediation.



Got the Tools?

Do you have all the necessary response program mechanisms in place to verify that response actions are complete?

Mechanisms can include:

- ❖ Authority via Tribal Laws/Codes or Council Resolution
- ❖ Tribal Approval Protocols or Procedures (Tribal SOPs)
- ❖ Technical resources & expertise



Arrangements in place for Approval or Verification to be conducted by:

- ❖ Trained and qualified Tribal staff
- ❖ Qualified Environmental Professional (as specified under 40 CFR §312.10)
- ❖ Qualified Tribal contractor(s) (contract in place?)
- ❖ US EPA and/or state environmental staff TA
- ❖ Other qualified government staff (BIA, IHS, BLM, etc.)
- ❖ Qualified local government staff
- ❖ Assistance from a technical assistance provider (A Brownfield TAB?)



Certification of Completion

Has a model Certification of Completion been developed?

- ❖ Tribal and BIA officials informed of what it is?
- ❖ Signatures & sign-offs needed determined?
- ❖ Legal review and support in place?
- ❖ Filing and record system in place?
- ❖ Know who needs a copy?
- ❖ Any other approvals needed?
- ❖ What follow up may be needed?

All the above could be steps in a SOP



Other Types of Certificates

Have you developed a model for circumstances under which the Tribe might issue a qualified certification to include a:

- ❖ Conditional Certificate of Completion;
- ❖ Partial Certificate of Completion;
- ❖ No Further Action (NFA) determination; or
- ❖ Comfort Letter

Tribal legal counsel should be consulted for the appropriate document to be used for a specific situation by the Tribe in accordance with Tribal laws and codes.



Other Agency Actions

- ❖ Provide oversight services of a cleanup to another agency (State, DoD or USACE)?
- ❖ Contract Tribal services to another agency?
- ❖ Use 128(a) funds to verify a past or current cleanup by another party or agency on Tribal lands?



Port Heiden, AK Tribal Staff Training for Conducting On-site Cleanup Work



128(a) Guidance

Consult the latest U.S. EPA Guidance: U.S. EPA Office of Brownfields Land Revitalization issues an annual 128(a) funding guidance each Fall*:

“Funding Guidance for State & Tribal Response Programs, Fiscal Year 20xx”

NOTE: This guidance is supplemented by the EPA Regions

*See Funding Guidance Link: [State and Tribal Response Program | US EPA](#)



Traditional Language

**Tribal Response Program/Brownfield
Three Affiliated Tribes
Environmental Division**

hunaanu' kUšINaseéNU ti-
raawaaruuxtii

šikaakatuúteeRI t atsú tiwaaraarux-
tii

tuxtaaNA'o noohunaáčituú'

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4. The earth is the only thing that lives for ever!





[Click to play video, which will open in YouTube.](#)

Video 5.3: Traditional Language in Public Outreach

Lyle Gwin

TRP Coordinator, Three Affiliated Tribes, Fort Berthold, ND



Prior Notice

CERCLA Section 128(a) (2) (C)(ii)

Prior Notice

- ❖ This requirement applies to **all planned response actions** conducted under the authority of the Tribal Response Program. This would include, at a minimum, all site-specific response actions conducted utilizing TRP Grant funds.
- ❖ A reasonable amount of time should be provided for the review and comment of documents by the community and the documents should be reasonably available for review.



Prior Notice

A general public meeting or forum should be conducted to answer questions and provide additional information as well as to receive verbal and/or written comments.

The [Tribal Administrative Requirements](#) or policies should be consulted for the appropriate forum and process to be utilized.

Note: The Assessment or Cleanup Contractor could be tasked to assist with the meeting and/or provide information.



Tribal Accomplishments

- ❖ Tribes have provided copies of documents in the Tribal environmental office, the main Tribal government offices and in some cases in local communities, district offices or schools/libraries.
- ❖ Tribal web sites (and social media) have been used to provide information as well as copies of documents and reports.
- ❖ Some Tribes have also provided translations of key information or summaries in the local/traditional language(s).
- ❖ Many Tribes are using the [Brownfields Inventory Tool \(BiT\)](#) to document and store site photos and reports.
- ❖ Contractors can be used to prepare and/or present information.





Request for an Assessment

CERCLA Section 128(a) (2) (C)(iii)

Request for Assessment

This requirement states that a **person** may **request** an assessment of a brownfield site in the community in which the person works or resides. Therefore, such a person need **not** be an enrolled Tribal member to make such a request.

Note that in CERCLA a “person” is defined as: an individual, firm, corporation, association, partnership, consortium, joint venture, commercial entity, United States Government, State, municipality, commission, political subdivision of a State, or any interstate body.



Request for Assessment

- ❖ There are many ways to provide a mechanism for a “person” to request that potentially contaminated sites in their community be evaluated and be addressed as appropriate by the proper agency.
- ❖ In return, they should expect to receive a timely response to their request and be provided information on the status or condition of the site and what action may be initiated by whom.
- ❖ An Assessment conducted with EPA Grant funds or by EPA as a “Targeted Brownfield Assessment” (TBA) must be approved by EPA.



Request for Assessment

Upon request, any site can be investigated by the TRP to determine if:

- ❖ It should be included in the survey and inventory of Brownfield sites;
- ❖ Other actions should be taken to determine if any contaminant releases, past or present, should be assessed and possibly remediated or addressed in some way;
- ❖ If a site or potential release of contaminants is subject to other federal or state jurisdiction.



Request for Assessment

Such requests can be a **valuable source of information** and can lead to sites added to the Brownfield Inventory and further assessment and cleanup actions by the TRP, the U.S. EPA, the state or other appropriate agency or party.

Such requests can lead to discovery of sources of contamination that otherwise would not have been discovered including illegal dumping.



Example “Requests”

- ❖ Sisseton-Wahpeton Oyate, SD: The TRP found buried dynamite based upon a community member report and request.
- ❖ Three Affiliated Tribes, Fort Berthold, ND: The TRP found a shed full of abandoned RCRA hazardous waste and a building with abandoned hazardous chemicals due to a request.
- ❖ Many old and current landfills and dump sites are located due to requests to conduct assessments.



Tribal Accomplishments

- ❖ Pow wows and other social events have provided opportunities for outreach and information booths.
- ❖ Tribes have conducted public/community many meetings and provided information at Tribal government meetings.
- ❖ Tribes have used local radio stations, social media and newspapers or newsletters to provide announcements and information on the site activities.



Tribal Issues & Difficulties

Access to Information

- ❖ Providing access to documents to the public in remote communities.
- ❖ Providing access to documents during adverse weather periods/seasons.
- ❖ TRP participation and coordination with response actions conducted by other programs or agencies.
- ❖ Attendance at public meetings.



Tribal Issues & Difficulties

Assessment Requests

- ❖ Determining site land status and ownership in a timely manner
- ❖ Tribal Jurisdiction to conduct an assessment
- ❖ Acquiring funding for an Assessment
- ❖ Seeking a “Targeted Brownfield Assessment” (TBA) can be time consuming
- ❖ Tribal and/or contractor site access
- ❖ Establishing site priority for further action



Lessons Learned

- ❖ Do not put original/only copies out for public review
- ❖ Make information and documents available as soon as possible
- ❖ Some documents and reports need some explanation or clarification (too technical)
- ❖ Maps and photos are very helpful.



Lessons Learned

- ❖ Failure to provide the community or Tribal leadership timely and complete information can lead to problems and delays in the project.
- ❖ Just announcing a public meeting may not achieve the necessary goals of public input and participation. More **proactive outreach** to the community and Tribal government may be necessary. (attend other meetings)



Lessons Learned

Assessment Requests

- ❖ Do not ignore any report or request.
- ❖ Determine timely ways to research property status, ownership and history.
- ❖ Provide timely feedback to person or organization that made request or report on status of action.
- ❖ Document requests and responses.
- ❖ Improved knowledge and coordination with other programs.
- ❖ Develop a standard operating procedure (SOP) on how to handle and respond to Assessment Requests.



Further Implementation

- ❖ Improve filing and/or database information management and access.
- ❖ Improve GIS and mapping capabilities of sites.
- ❖ Improve means to research property status, ownership and history.
- ❖ Additional sources of funding to address site issues (other mechanisms and resources).
- ❖ Generally improve outreach capabilities and information access.



Further Implementation

- ❖ Improved coordination with other agencies and programs
- ❖ Improved means of community access to information and knowledge of where it is located for review



We Would Like to Hear From You

Questions about this Module or need other brownfields assistance?

Contact the Tribal TAB team at
Tribal-TAB@ksu.edu



Scan this QR image to provide feedback on this TRP Module

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