



TO: Tribal Leaders and Housing Directors

FROM: Tribal Infrastructure Task Force Federal Partners

The federal partners of the Infrastructure Task Force (ITF), which includes representatives from the US Departments of Agriculture, Health and Human Services, Housing and Urban Development, Interior and the Environmental Protection Agency, would like to offer you an opportunity to join the Waste Programs Sub-Workgroup to share your insights on approaches for engaging tribal communities on waste issues, promoting the development and use of integrated waste management plans and addressing open dumps. The goal of Sub-Workgroup is to promote sustainable waste management programs practices and eliminate open dumps in Indian country and Alaskan Native Villages.

Since 2003, the ITF has been working under a Memorandum of Understanding to improve access to safe drinking water and basic sanitation in Indian country. In 2013, waste issues were added to the ITF's focus because of the commonalities between the best management practices of waste, drinking water and wastewater services. Additional background information about the ITF is on the EPA website (<http://www.epa.gov/tp/trprograms/infra-water.htm>).

The objectives of the Waste Programs Sub-Workgroup are to:

- Develop strategies for engaging with tribal communities to promote sustainable waste management programs and sustainable solutions for waste management issues.
- Promote sustainability by assisting tribes in the development and implementation integrated waste management plans.
- Review and propose modifications, if necessary, to the process currently used to identify, inventory and report open dumps in Indian country and the protocol for assessing their health threat.

The attached sub-workgroup action plan summarizes the proposed project actions, deliverables and timetable. If you and/or a designee are interested in actively participating in the Sub-workgroup, please send name, title, tribal and/or organization affiliation, email and telephone number to [TribalITF@epa.gov](mailto:TribalITF@epa.gov) by **September 30, 2014**. Make sure to include ITF Waste Programs Sub-Group in the email subject. For further information, please contact Charles Reddoor, U.S. EPA ([Reddoor.Charles@epa.gov](mailto:Reddoor.Charles@epa.gov)) at 703-308-8245 or CAPT David Harvey, Indian Health Service ([David.Harvey@ihs.gov](mailto:David.Harvey@ihs.gov)) at 301-443-0159.

## **ITF Solid Waste Sub-Workgroup Action Plan**

### **1.0 Problem Statement**

In a Memorandum of Understanding (MOU) signed on March 28, 2013, the Infrastructure Task Force (ITF), which includes the US Departments of Agriculture, Health and Human Services, Housing and Urban Development, Interior, and the Environmental Protection Agency, reaffirmed a previous MOU, stating that they would continue to identify and address programs, initiatives, and other issues that will improve planning construction, operation and maintenance of sustainable infrastructure in American Indian and Alaska Native communities. The ITF Solid Waste Sub-Workgroup (the Workgroup) is established and works under the authorities set forth in the 2013 Infrastructure Task Force Memorandum of Understanding.

All of the federal partners on the ITF acknowledge that federal agencies should work collaboratively to promote sustainable solid waste management programs in Indian country, including developing integrated waste management plans, and closing, cleaning up, or upgrading open dumps to ensure progress toward the sustainable management of solid waste and eliminating open dumping in Indian country.

### **2.0 Objective and Outcomes of the Practical Work**

The broad objectives of the Workgroup are to:

- Encourage federal partners' understanding of the authorities and limitations of each member agency.
- Provide outreach information and materials on waste management, including using the ITF website.
- Engage with American Indian/Alaska Native tribes and villages to promote sustainable waste management programs and sustainable solutions to address solid waste issues, including open dumps.
- Promote sustainability through the development and implementation of Integrated Waste Management Plans.
- Promote federal partners' understanding of the scope and costs to close, clean up, or upgrade the open dumpsites on American Indian/Alaska Native tribes and villages throughout the United States. Develop federal partners' understanding of waste and open dump deficiencies.
- Review the strategy currently used to identify and inventory open dumpsites in Indian country and the protocol for assessing their health threat.

### **3.0 Project Actions and Deliverables**

The specific project actions that the Workgroup will conduct to meet the objectives described above include:

1. Develop strategies for engaging with American Indian/Alaska Native tribes and villages to promote sustainable solid waste management programs and sustainable solutions to address solid waste issues, including open dumps. The methodology should examine how federal agencies and/or other “outside groups” can effectively work with these communities to achieve sustainable implementation of a solid waste management program.

Deliverable: Recommended interagency approach with suggested pilot communities for testing. The report should describe how the recommended pilot communities are developing a sustainable program. The ITF shall consider the recommended approach for implementation.

2. Promote sustainability through the development and implementation of Integrated Waste Management Plans.

Deliverable: Recommended interagency approach with suggested pilot communities for evaluation. The report should describe the recommended pilot communities’ implementation of Integrated Waste Management Plans and developed sustainable operations. The ITF shall consider the recommended approach for implementation.

3. Assess the completeness of the IHS SDS data to determine if projects exist to close, clean-up or upgrade all open dumps in the current OMDS inventory. For this action, the open dump definition will be that described in the Indian Lands Open Dump Cleanup Act, Section 3(7), and Section 9(b). The IHS member of the ITF will follow up with the IHS engineering staff where applicable.

Deliverable: A documented line listing that links each open dump meeting the definition described in the Indian Lands Open Dump Cleanup Act to an SDS project in the IHS FY 2014 SDS list. At minimum, this line listing will also include EPA Region, State, IHS Area, Tribe, Facility Name, Status, Condition, Health Threat, Health Threat Score, and SDS project number.

4. Determine a comprehensive list of users entering open dump data into the IHS OMDS. Survey those users about the utility of the open dumps field form and OMDS user interface. Based on the results of that survey, propose appropriate changes to the user interface and field form.

Deliverable: A comprehensive list of users that includes Full Name, IHS Area, Permissions Description, and Last Login Date.

Deliverable: A report of the user survey that includes a list of the questions asked, summary of the answers received, and recommendations based on the survey results.

Deliverable: A revised open dump field form as appropriate based on the survey results. If concurred by the ITF federal partners, implementation by dissemination to all EPA Regions and IHS Areas, and posting in the IHS STARS library.

5. Evaluate the health threat scoring methodology used by the IHS OMDS, including the thresholds between low, moderate, and high health threat sites. Provide recommendations to the ITF principals about the use of the health threat score for open dump project priorities.

Deliverable: Depending upon the results of the evaluation, make recommendations changes to the OMDS scoring algorithm, including the weighting of individual scoring factors and the threshold between high, moderate, and low threat sites. If agreed by the ITF federal partners, the IHS will implement changes and send notice to all registered OMDS users within 4 months, depending upon the availability of resources.

Deliverable: A summary report to the federal ITF principals that addresses Actions 3 and 4.

6. Develop and recommend a format for annual open dump status reporting to the ITF principals.

Deliverable: A summary report to the federal ITF principals that addresses Actions 3 and 4.

#### **4.0 Project Schedule (IHS will develop milestone schedule for Calendar Year)**

<b>Milestone</b>	<b>Completion</b>
Charter accepted by the ITF	2014 – Q3
Interagency community engagement strategy - methodology and pilot location recommendations	2015 – Q2
Interagency sustainability plan to promote sustainability through the development and implementation of Integrated Waste Management Plans	2015 – Q1
Comprehensive list of OMDS users	2015 – Q1
Survey of open dump evaluators	2015 – Q1
Report to ITF of the results of the survey of open dump evaluators	2015 – Q1
Revised open dump field form	2015 – Q1
Detailed recommendation for changes to the OMDS scoring algorithm	2015 – Q2
Summary report to the federal ITF principals with recommendations about the use of the health threat score for open dump project priorities	2015 – Q3
Sample of annual open dump status report	2015 – Q3
In addition, the workgroup will develop other projects building on Tribal and the Federal Interagency recommendations.	On-going

## **5.0 Project Organization**

The Workgroup members are:

Indian Health Service

- David Harvey - Indian Health Service – Chair
- Carol Rogers - Indian Health Service

Tribal Representatives – To be determined

Environmental Protection Agency

- Charles Reddoor – Headquarters, EPA
- Shem Chou – SEE, Region 5, EPA
- Garrett A. Smith – SEE, Region 2, EPA

Midwest Assistance Program

US Department of Agriculture

- Joyce Taylor
- Steve Saulnier

Bureau of Indian Affairs

Department of Housing and Urban Development

Department of Energy

Other agencies invited to participate

Federal partners may add, substitute, or remove work group members at their discretion.

## **6.0 Team Meetings and Communication Process**

The Workgroup will meet one time per month for two hours unless specific work tasks require more frequent meetings. The Workgroup will meet by teleconference unless the meeting requires review of digital images. In that case, the members will use Adobe Connect or other webinar-type to share the digital images. The Workgroup will exchange documents via email.

CAPT David Harvey of the Indian Health Service will coordinate the meetings and will be responsible for keeping discussions effective and efficient. CAPT Harvey will also communicate progress to the ITF at their meetings in the form of a verbal report and will deliver the documents generated by the Workgroup. The Workgroup will also seek guidance from the ITF, as needed.

## **7.0 Project Assumptions**

The underlying assumption is that each member of the Workgroup will strive to achieve the goals of the Workgroup. Each Workgroup member will collaborate with the appropriate level of authority within their organizations to ensure the performance goals are accepted and supported by each organization. With the facilitation of the ITF, the partner agencies will support the implementation of the methodology/conditions the Workgroup identifies to achieve the goals of the ITF and improve the public and environmental health in American Indian and Alaska Native communities.