TRIBAL ENVIRONMENTAL PLAN

10/1/2014

For the Gila River Indian Community Department of Environmental Quality

This Plan:

- develops the complete picture of the environmental issues that currently challenge the Gila River Indian Community,
- establishes a shared understanding of the issues and environmental priorities the Community is and will be working on during FY15, and
- provides a shared understanding of these issues and priorities that EPA will continue to assist the Community with in order to protect human health and the environment.

Tribal Environmental Plan

FOR THE GILA RIVER INDIAN COMMUNITY DEPARTMENT OF ENVIRONMENTAL QUALITY

THE GILA RIVER INDIAN COMMUNITY

The Gila River Indian Community ('GRIC' or 'the Community'), a federally-recognized tribe established in 1859, is located in south-central Arizona bordering both Maricopa and Pinal counties. With close to 21,300 enrolled members, the Community is home to two tribes—the Akimel O'Odham and Pee Posh. The tribal lands encompass 374,000 acres (640 square miles) with wildlife habitat ranging in diversity from wetlands at 900 feet in elevation to conifer shrub communities at 4,000 feet in elevation.

While the Community affiliates its people and its government with the tribal seal shown in **Figure 1**, the seal depicts the many environmental elements that the Community strives to protect. The seal symbolizes the Gila River—which runs parallel through GRIC—bringing life to the desert. It also illustrates the Community's rich agricultural history. The irrigation system is representative of those developed by their ancient descendants, the Hu Hu Kam. From the blue skies overhead, to the majestic mountain backdrop, the seal represents the indigenous people of the area, Akimel O'odham, the "river people."

Figure 1. GRIC Tribal Seal

In protecting these environmental elements, GRIC has set itself apart from many tribal nations by having established rigorous regulatory and enforcement actions—resulting in hundreds of regulated facilities throughout the Community. Some highlights of these activities include:

- The Community has three (3) industrial parks containing approximately 60 industrial tenants along with several industrial facilities located in out-lying areas.
  - Many of these tenants have been designated hazardous waste generators—thirteen (13) Conditionally Exempt Small Quantity Generators (CESQG), nine (9) Small Quantity Generators (SQG), and four (4) Large Quantity Generators (LQG).
  - One (1) Federally-regulated major source of air pollution, several minor point sources of air pollution, and Non-Title V sources have been permitted.
  - Fourteen (14) facilities hold Air Quality Permits, while there are thirty-four (34) pending permits.
- The largest source of air pollution in the Community is emissions from vehicle activity.
  - Interstate-10 is the single largest source of pollution with 1.4 million vehicle miles traveled daily.
  - GRIC has approximately 160 miles of unpaved roads that are rarely traveled—consisting of farm roads and access routes to remote areas.
- The Community has also conducted thorough Environmental Site Assessments (ESA) throughout the Community including:
  - Ten (10) Phase I Assessments and thirteen (13) Phase I and Limited Phase II Assessments.
  - Seven (7) U.S. Environmental Protection Agency (EPA) targeted Brownfields have been identified.
- The Community is rigorous in ensuring that all pesticide regulated activities, which include the production, transportation, storage, sale, pesticide devices, the use and disposal of pesticides as well as their containers are conducted according to Federal and Tribal Law. The Pesticide Control Office currently monitors and regulates (33) agricultural and (32) non-agricultural pesticide use permit holders on a

routine basis, conducts pesticide misuse inspections as needed and offers multiple training opportunities which cover various aspects of pesticide safety.

- The Water Quality Program carries out numerous monitoring, assessment, inspection, compliance assistance, and enforcement activities for wastewater, surface water, and groundwater—to ensure that Community laws are upheld. As part of these efforts, the DEQ Water Quality Program requires regulated facilities and activities to have general or individual permits. Currently, we have issued the following permits:
    - Twelve (12) waste-water treatment facility permits, and
    - Six (6) water re-use permits

The Community Districts

The Community is divided into seven districts, as shown in **Figure 2.** Since the districts vary in size and in land use, each are faced with different environmental challenges. The Community's residential population of approximately 12,100 is spread out across the Community with some districts more populated than others.

The Gila River, symbolized in the tribal seal, is highlighted in blue in **Figure 2.** The Gila River traverses the Community from the southeast to the northwest and is a 650-mile long tributary to the Colorado River that spans parts of New Mexico and Arizona draining an arid watershed of nearly 60,000 square miles. Due to upstream diversions and flood control structures, the Gila River bed within the Community boundaries has both ephemeral (brief flows during and after storm events, rainfall, or upstream snowmelt) and perennial (continuous flow in parts of the streambed all year during years of normal precipitation) flow patterns.

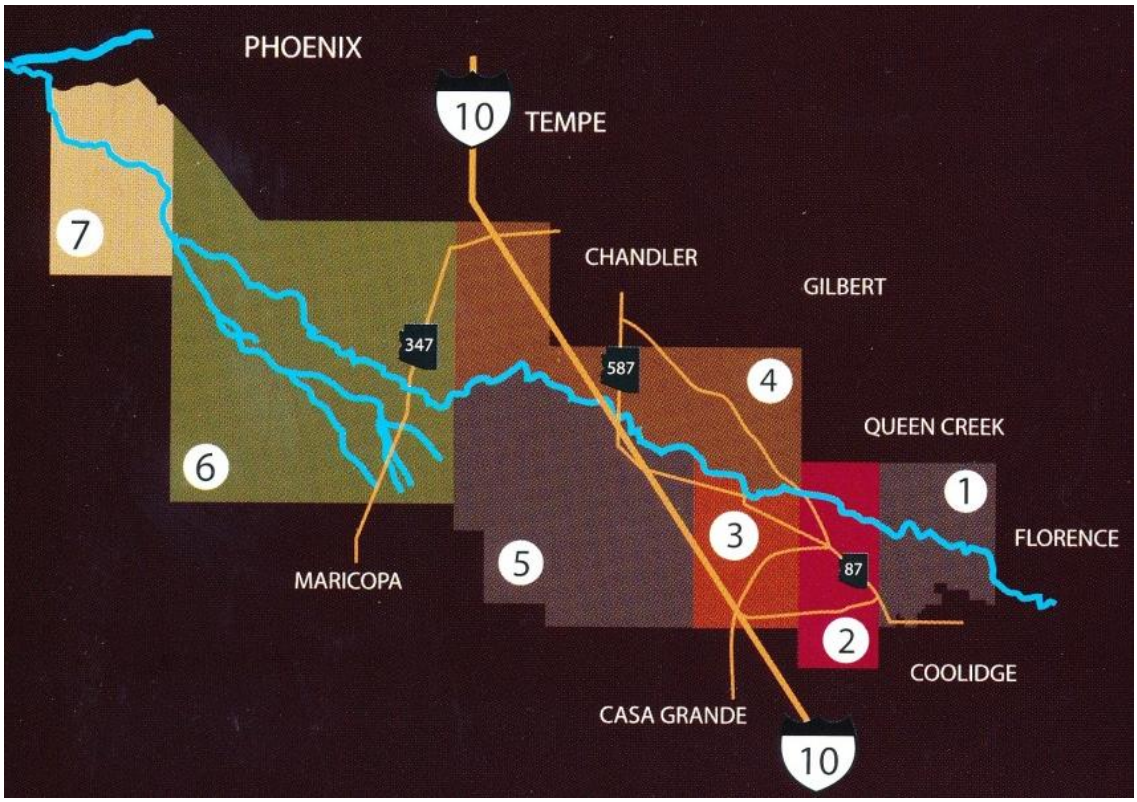

Figure 2. GRIC Map of Districts

DISTRICT 1- BLACKWATER - is the smallest and most Eastern district. It is roughly 50 square miles and is home to an estimated 1,160 residents in approximately 340 households. On October 2, 2013, residential curbside recycling service began in District 1. Abandoned and inoperable vehicles (along with scrap metals) do not pose a problem within the Community as individuals typically salvage them. Out-of-service buildings are a concern in several districts because there is a lag in addressing the demolition of these structures, as they require testing for lead and asbestos, which must be coordinated with OSHA and the Department of Public Works (DPW). DEQ receives and reviews the test results prior to demolition.

The Blackwater Industrial Park, located within District 1, currently has no tenants. A Phase I assessment has been completed at the site and only one area—an old burn pit—was detected to contain ammonium chloride. In 1997, a large tire fire occurred in this industrial park. Approximately 2 million shredded tires burned for several months in the fall of 1997. ***Environmental issues facing District 1: residential waste management, out-of-service buildings, recycling, Brownfields, and hazardous waste management.***

DISTRICT 2 - HASHEN KEHK - is home to the Olberg Bridge, which stands as a reminder of the history and culture of the Akimel O'odham and Pee Posh tribes. It was once considered a great engineering wonder when it was completed in the 1920's along with the Sacaton Dam—which diverted water to irrigate land in the district—as part of the Pima-Maricopa Irrigation Project. Water and farming have long been a tradition and a central part of life for the people of Hashen Kehk. In 2013, surface water was released in District 2's reach of the Gila River as part of a groundwater recharge and ecosystem restoration project. This district is the smallest district—primarily residential with an estimated population of 530 and about 170 homes—and was the second district to receive curbside recycling services (initiated in February 2012). ***Environmental issues facing District 2: residential waste management, recycling, out-of-service buildings, water quality management—surface and groundwater, Brownfields, and wildlife and habitat management.***

DISTRICT 3 - SACATON - was named after the giant Sacaton grass that once grew in this valley. It is one of the smaller districts of approximately 39 square miles, but the most populated district with an estimated residential population of 3,030 and about 630 households. District 3 was the first district to receive curbside recycling services (initiated in May 2011). Sacaton is the unofficial capital of the Community, as it has always been the center of commerce and government activity for the tribe—most government buildings are located in this district. Some agricultural activities (Gila River Farms & lease-hold farms) take place in this district. The Department of Public Works maintains a Solid Waste Transfer Station in District 3, which serves as a collection area for green wastes and has a shredder on site. ***Environmental issues facing District 3: residential waste management, recycling, out-of-service buildings, green wastes, Brownfields, universal wastes, air quality, pesticides, and agricultural wastes.***

DISTRICT 4 - SAN TAN - is large—119 square miles—and unique in that it is comprised of eight (8) distinct villages—with approximately 2,250 residents in about 530 homes—and has the Santan mountain range as its northeastern boundary. On October 2, 2013, residential curbside recycling services began in District 4. Because of its close proximity to the Phoenix metropolitan area and access from Interstate-10, District 4 has seen the most industrial growth of any of the districts—containing sports and recreation venues and tribal, commercial, and agricultural businesses, including hotels and casinos.

There are two industrial parks located within this district: 1) Santan with two (2) tenants and 2) Lone Butte Industrial Park with fifty-two (52) tenants. All tenants are permitted with several designated Hazardous Waste Generators—both small and large generators—that are inspected regularly for proper handling of

wastes and hazardous material. The Santan Park contains a Brownfields site—a former tannery—that has been cleaned up and is currently undergoing the final reporting phase. Two (2) sand and gravel operations are located within this district and are inspected for proper waste disposal.

Another environmental concern that is unique to GRIC within this district and District 5 is the impact from smuggling immigrants from Mexico. GRIC is directly located between the Phoenix Metropolitan area and the Mexican border. Human smugglers have established staging areas within the Community prior to delivering their human cargo into the Phoenix area. These staging areas are indiscriminant spots in close proximity to Interstate-10 and are well concealed. The staging areas are littered with solid waste, as well as human waste. Mobile drug labs also pose a threat to the Community as they are left behind in random areas of the Community. ***Environmental issues facing District 4: residential waste management, recycling, water quality management—surface and groundwater, industrial waste management, hazardous waste management, underground storage tanks, Brownfields, air quality, pesticides, illegal dumping, agricultural wastes, and wildlife and habitat management.***

DISTRICT 5 - CASA BLANCA - is roughly 99 square miles and is comprised of six village areas—with nearly 2,200 residents in about 500 households. Its northern boundary is the Gila River, which has made this district historically and presently the center of agricultural production for the Pima and Maricopa tribes. Today, modern versions of the ancient irrigation systems allow the Gila River Farms, founded in the 1960's, to cultivate nearly 40,000 acres of land with approximately130, 000 acres of additional agricultural land available. ***Environmental issues facing District 5: water quality management—surface and groundwater, pesticides, air quality, residential waste management, recycling, illegal dumping, Brownfields, agricultural wastes, air quality, and wildlife and habitat management.***

DISTRICT 6 - LAVEEN - sits in the shadows of the Sierra Estrella Mountains where the sandy river beds of the Gila and Santa Cruz Rivers cross. District 6 is 176 square miles and has four village areas—with approximately 2,310 residents in about 540 homes, the Komatke Community Health Center, and one of the three Community casinos. Gila Crossings School, located in this district, has a Community garden with a demonstration composting area. ***Environmental issues facing District 6: residential waste management, recycling, green wastes, illegal dumpling, pesticides, Brownfields, agricultural wastes, water quality management—surface and groundwater, air quality, wildlife & habitat management.***

DISTRICT 7 - MARICOPA - is the western most part of the Community at the base of the Sierra Estrella Mountains. The Gila River joins the Salt River at the District's northwest boundary creating two lush wetlands—diverse ecological habitats in the desert region. District 7 has an estimated population of 660 and the fewest homes (about 160). Due to the location of District 7—proximity to the Phoenix metropolitan area and the Salt River—it provides illegal dumpers the opportunity to trespass, thus making illegal dumping a concern in this district. ***Environmental issues facing District 7: residential waste management, recycling, illegal dumpling, agricultural wastes, water quality management—surface, aquatic habitat, and groundwater—pesticides, air quality, and wildlife and habitat management.***

HISTORY OF THE DEPARTMENT OF ENVIRONMENTAL QUALITY

GRIC established the Department of Environmental Quality (DEQ) on August 1, 1995. At that time DEQ brought together existing programs, including environmental education and outreach, pesticides, solid waste, and water quality—again, areas symbolized in the tribal seal. Today, DEQ has expanded to include an air quality program and specific waste programs that target hazardous waste and recycling. DEQ continues to pursue expansion to address the protection and conservation of the Community wildlife and their habitat. **Figure 3** shows the organizational structure of DEQ under GRIC's Council and Natural Resources Standing Committee, in which both provide guidance and oversight for DEQ activities and initiatives.

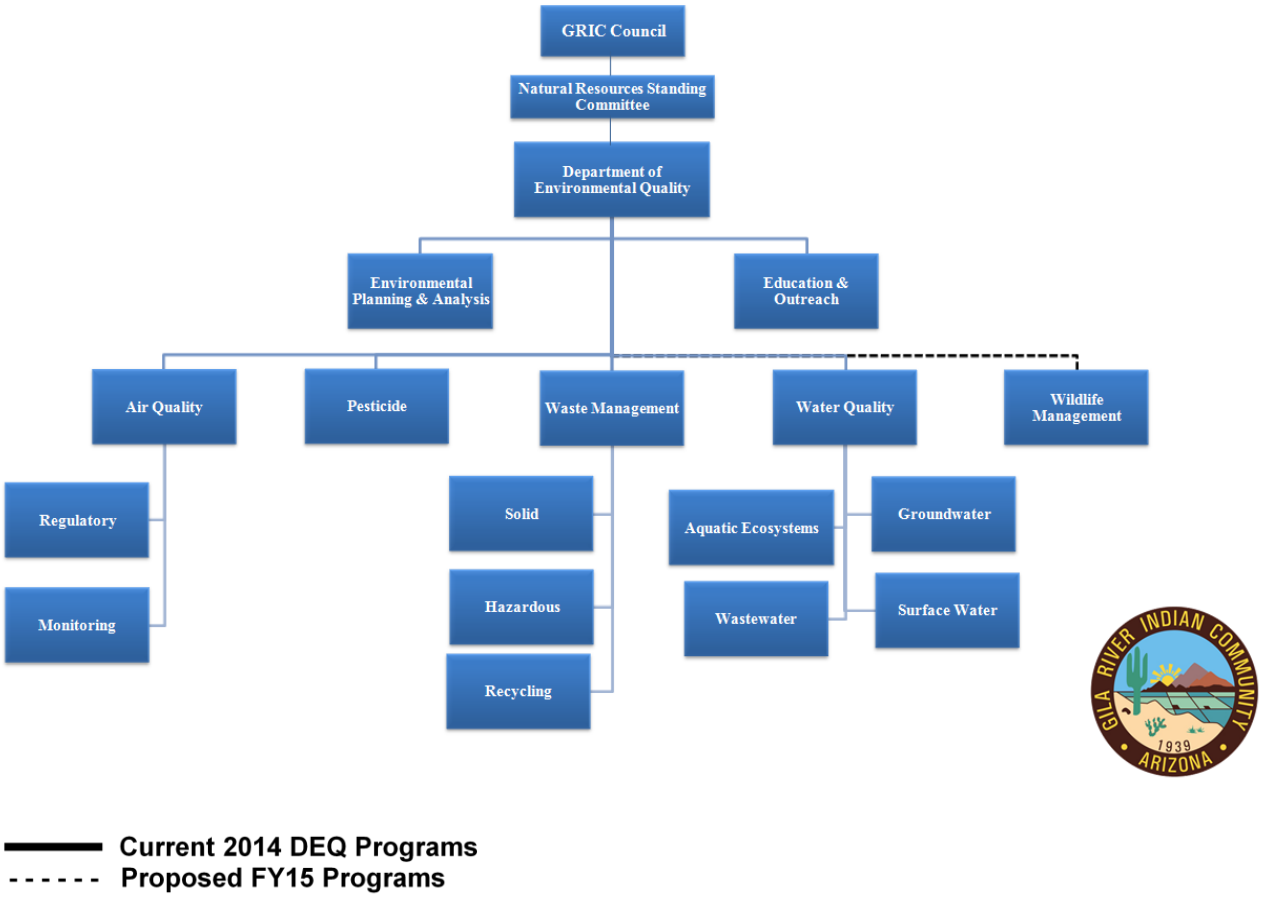

Figure 3. DEQ's Organizational Chart

The Department of Environmental Quality's mission is to preserve and protect the Community's valuable natural resources, which include air, water, land, culture, wildlife, and the restoration of traditional ways of life.

Currently (FY14), there are seven (7) Community Environmental Ordinances that the Department of Environmental Quality and its programs are tasked with enforcing. These include:

1. GR-06-85: Beehive Ordinance
2. GR-07-87: Control and Suppression of the Pink Bollworm
3. GR-05-14: Pesticide Ordinance
4. GR-04-02: Medical Waste Ordinance
5. GR-04-14: Waste Management Ordinance
6. GR-01-08: Wastewater Management Ordinance
7. GR-06-08: Air Quality Management Plan

Figure 4 is the DEQ seal. In the early 2000's, the seal was created to symbolize all the natural environmental elements DEQ strives to protect—similar to the Community seal. The seal represents the importance of clean air, water, and soil, healthy aquatic systems—surface water and groundwater, protection of these environmental conditions, including the protection and conservation of Community's precious wildlife and its habitat.

Figure 4. DEQ Seal

Education and Outreach

DEQ understands the first line of defense in protecting the Community's natural recourses is providing extensive outreach and education to the Community's residents, employees, tenants, and visitors. As such, DEQ has a dedicated staff person to these tasks. The position collaborates and supports all four main branches of DEQ (Air Quality Program, Pesticide Program, Waste Management Program, and Water Quality Program). This position attends district meetings and acts as the liaison between DEQ and other GRIC departments. By providing a variety of educational opportunities—at every level—DEQ can improve the success of DEQ's natural resources management and protection efforts.

Environmental Planning and Analysis

The Environmental Planning and Analysis program is responsible for the planning of resource assessments and allocations, coordination and administration of technical, policy analysis, and regulatory environmental affairs within DEQ. This program provides a variety of support for the DEQ programs, which includes all aspects of environmental incidents, agency reporting, coordination with other jurisdictions, and regulated entities. This program also plays an instrumental role in the development of the Wildlife Management Program. By providing complex technical assistance, this program can assist DEQ with environmental laws, regulations, legislation, and policies—while helping to stay current with changes in these areas.

Air Quality Program

The Community was the first tribe in the U.S. to develop a multi-program Air Quality Management Plan (AQMP), also known as a Tribal Implementation Plan (TIP), to regulate air quality under the Clean Air Act. The Community's AQMP significantly reduces emissions by establishing regulatory requirements for stationary and area sources that did not exist prior to the AQMP.

The GRIC AQMP is significantly different from traditional State Implementation Plans (SIPs) in that it includes and fully integrates detailed administrative procedures, federal New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAPs), and Maximum Achievable Control Technologies (MACT). The AQMP also establishes flexible methodologies for evaluating emission limitations or work practices based on the maximum degree of reduction of each criteria pollutant or hazardous air pollutant on a case-by-case basis, for non-Title V sources. The new regulatory approach developed by GRIC for its AQMP is called Best Reasonable and Demonstrated Technology (BRDT).

Throughout the development of the AQMP, the Air Quality Program conducted in excess of 200 presentations explaining the content of the AQMP. The lengthy stakeholder process included industry, regulators in other jurisdictions (state and county), environmental organizations, and Community members that helped to assure the sustainability of this program. The GRIC DEQ Air Quality Program developed partnerships with its neighbors and the U.S. Environmental Protection Agency (EPA) and actively participates in the Joint Air Toxics Assessment Project—a multi-jurisdictional effort to assess and reduce risks from air toxics in the Phoenix Metropolitan and surrounding areas.

The AQMP was enacted into tribal law by the Gila River Indian Community Council on December 6, 2006. In 2009, EPA determined that GRIC's AQMP met the requirements for program eligibility—Treatment as a State Status (TAS)—under the main regulatory programs of the Clean Air Act.

The Air Quality Program is responsible for protecting the ambient air quality of the Community. The program currently is comprised of two sections: 1) Regulatory – which carries out permitting and compliance and enforcement activities, and 2) Monitoring – which conducts ambient air quality monitoring within the Community.

Pesticide Control Office

In 1981, GRIC established the Pesticide Control Office, adopted a pesticide code, and subsequently entered into a cooperative agreement with the EPA. This effectively made GRIC one of the first tribes in the nation to address the potential risks caused by pesticides. In 1995, the program was housed under the newly created DEQ and the pesticide ordinance was revised. Since its inception, the pesticide control office continues to reduce pesticide related risks, such as illness and injury, to the pesticide workers, handlers, and applicators, and the Community's residents, employees, and visitors.

The Pesticide Program's Vision: "To be the best Tribal pesticide program in the nation."

Furthermore, the Community is committed to ensuring that all pesticide regulated activities, which include the production, transportation, storage, sale, pesticide devices, the use and disposal of pesticides as well as their containers are conducted according to Federal and Tribal Law. The pesticide control office accomplishes this in part by:

- Managing an Environmental Protection Agency, Pesticide Consolidated Cooperative Agreement.
- Providing a permitting mechanism for pest management businesses, growers and seed treaters.
- Providing a registration mechanism for sellers, producers and pest control advisors.
- Providing a certification mechanism for applicators applying general use and restricted use pesticides.
- Providing pesticide safety training for Community Applicators.
- Providing Worker Protection Standard training for agricultural workers and handlers.
- Conducting Community outreach and compliance assistance
- Enforcing Federal and Tribal law through compliance inspections based upon a neutral inspection scheme.

Waste Management Program

The first GRIC Solid Waste Ordinance became effective in 1995. During initial years of the ordinance GRIC waste program activities included closing the two (2) open-dump landfills serving the Community, initiating a routine municipal waste (residential and business) pickup service, and opening a transfer station for shipping to an off-site solid waste landfill.

Since then, under the GRIC "Integrated Waste Management Plan" (the DEQ Solid Waste Management Plan) and with the assistance from EPA grants, the Waste Management Program has been responsible for ensuring that solid and hazardous waste do not adversely affect human health and the environment. The program staff inspects industrial facilities, conducts environmental investigations of past and present disposal of waste, addresses Brownfield cleanups, provides oversight to underground storage tank (UST) installations/removals, and provides technical and regulatory assistance to first responders during emergency incidents that involve hazardous materials/hazardous waste. The Waste Management Program provides oversight during solid and hazardous waste remediation projects. The Program also provides technical assistance to Community departments and enterprises, as well as industrial facilities that store, transport, or generate hazardous waste.

The program works with the GRIC Police Department and the Department of Public Works to combat illegal dumping which has become a major problem with the growing urban development along the boundaries of the Community. The program continues to collaborate with other GRIC departments to ensure annual clean-up events—such as Earth Day Community Cleanup and Household Hazardous Waste Collections—are successful.

The Waste Management Program continues to include waste reduction as a goal by making recycling a priority.

Implementing a full-scale recycling program has been challenging within the Community, due to the Community's large size and lack of resources. The Waste Management Program continues to face these challenges and work toward solutions and recycling opportunities throughout the Community.

Water Quality Program

In 1988, the Community established the Water Quality Program and its own water quality goals to meet Community expectations for a healthy environment for its people. These goals were captured in the Community Water Policy. Those same goals became the Water Quality Program's activities, including:

- To establish, monitor, and enforce quality standards for all waters of the Community.
- To protect against pollution and contamination of domestic water sources by ensuring proper well design and maintenance, well monitoring, and preventing planning and management.
- To restore and maintain riparian areas, marshes, and wetlands.
- To manage aquatic ecosystems for multiple uses that will protect, conserve, and enhance the natural environment and provide recreational and other benefits to the Community.
- To apply appropriate and current technology in managing water resources to enhance and maintain the quality of surface water and groundwater on the Community.

The Water Quality Program is comprised of four distinct sections: 1) Groundwater Protection & Management, 2) Surface Water Protection & Management, 3) Wastewater Management, and 4) Aquatic Ecosystem Management.

These four sections work together to achieve the Water Quality Program's Mission: "To protect and restore the quality of the Community's groundwater, surface water, wetlands, and aquatic ecosystems."

The program carries out a multitude of tasks to accomplish its goals. The Aquatic Ecosystem Management conducts aquatic ecosystem health and wildlife assessments, and implements improvement projects. Under Wastewater Management, the program issues wastewater treatment facility permits, and wastewater reuse permits. The Surface Water Management monitors and assesses the quality of the water, including Nonpoint Source Pollution (NPS), and implements protection and improvement projects and ordinances. The Groundwater Management issues groundwater protection permits, well installation permits, and monitors and assesses the quality of the groundwater.

Wildlife Management Program

The Community has been home to wildlife and habitat for a wide variety of species since time immemorial. The cultural significance and value of various species is paramount; eagles, mule deer, mountain lion, bighorn sheep, gila monster, badger, beaver, as well as a multitude of passerines and raptors are interwoven into traditional stories, songs, and everyday life within the Community.

Increased human population density in the cities and towns bordering the Community, transportation networks, and commercial development pose a significant threat to the Community and regional wildlife. Wildlife and habitat issues/challenges within the Community have steadily increased over the last 5-10 years and the expectation is that without holistic assessments and management strategies, wildlife and habitat within the Community will be negatively impacted. The Community has recognized the importance of assessing and managing wildlife and habitat and is seeking much needed support from the US Fish & Wildlife Service to support our efforts to establish a Wildlife Management Program, which will develop comprehensive wildlife management strategies that focus on protecting and preserving wildlife and habitat, especially for culturally significant species.

PURPOSE OF THE PLAN

The primary purposes of this Tribal Environmental Plan ('the Plan') are to:

- develop the complete picture of the environmental issues that currently challenge the Gila River Indian Community,
- establish a shared understanding of the issues and environmental priorities the Community is and will be working on in the next fiscal year (FY15), and
- provide a shared understanding of these issues and priorities that EPA will continue to assist the Community with in order to protect human health and the environment.

Furthermore, the Plan serves secondary purposes, including:

- It is an important component of effective General Assistance Program (GAP) resource management that ensures GAP work plans are developed to support the long-term priorities and goals of the Community and include capacity building.
- Each DEQ Program has its own Management Plan (in final or draft version) that gives direction to that specific environmental program. But this Plan brings those efforts together under a smaller, more manageable time-frame and planning document.

TIME PERIOD OF THE PLAN

DEQ's intent regarding this Plan is that it is a small, applicable—readable and user-friendly—document that will be updated annually in concert with EPA Region 9 GAP and other annual work plans. The document format will remain fairly static, but the environmental program priorities will change to reflect the current concerns and priorities of the Community as well as budget changes that occur on a fiscal basis. ***This document will be revised every August for submittal to EPA for review and discussion by the fiscal year end (September 30).***

1.0 IDENTIFICATION OF GRIC ENVIRONMENTAL PRIORITIES

This section identifies DEQ's FY15 priorities at the departmental level, as well as each program's priorities. Where applicable, capacity building and program implementation goals are included. Under each priority the following items are provided when available:

A. Description of priority.
B. Long-term developmental goal(s) to help address/support priority.
C. Intermediate milestones that may occur during the TEP period.
D. Plan to manage program/priority.
E. Assistance needed.

Department of Environmental Quality FY15 Priorities

1. DEQ Team-Building

A. Description - bringing the different DEQ Programs together to act more holistically.
B. Long-term goal - investigate opportunities to bring physical offices into the same building. Currently, the DEQ program offices are physically located in different buildings - preventing DEQ from operating as a single unit.
C. Intermediate Milestones:
   i. Complete DEQ's Strategic Plan - which takes this Plan further by delving into DEQ internal priorities, policies, and administration.
   ii. Develop DEQ Outreach and Educational Program with specific tasks, schedules, activities, etc. This position has been underutilized in the past and is capable of great outreach achievements.
   iii. Organize and standardize departmental processes—including Standard Operating Procedures (SOPs)—and documents across all programs.
   iv. Develop the Environmental Planning and Analysis position as one with the capacity to bring the programs together.
D. Plan to manage priority - involving all DEQ personnel in strategic planning process and enhance members' strengths and identify weaknesses that need team assistance.
E. Assistance needed - funding for any contractual efforts to assist with meeting facilitation and/or document preparation.

2. Strengthen Administrative Capacity

A. Description – improving the communication and procedures between DEQ Programs and DEQ Administrative Team.
B. Long-term goal – develop Departmental procedures that will expedite requests/reporting and help DEQ operate more efficiently.
C. Intermediate Milestones:
   i. Develop standardized and uniform reporting system – such that all programs use same format for quarterly, annual, project, and closeout reports (when possible).
   ii. Create specific internal DEQ policies (regarding travel, grant applications, etc.) and train all DEQ staff on these policies to reduce error, save resources, and avoid duplicate effort.
   iii. Investigate opportunities for creating electronic forms, data base, and server files – to save resources and time, making DEQ more efficient, while reducing waste.
D. Plan to manage priority – provide more thorough training to administrative staff regarding grant applications and other pertinent programmatic efforts, while ensuring all DEQ staff are educated on all procedures as well.
E. Assistance needed – grant training and other technical assistance from EPA, technical training from GRIC IT regarding electronic forms, websites, computer software, and other computer issues, and

funding for any contractual efforts to assist with meeting facilitation and/or document preparation.

3. **Pursue and Create a Wildlife Management Program**
   A. Description - developing and funding a long-term, sustainable program (either housed in DEQ or another GRIC Department) that's sole purpose is to conserve and protect wildlife and its habitat.
   B. Long-term goal - is to have a tribally funded Wildlife Management Program under DEQ.
   C. Intermediate Milestones:
      i. Secure funding to hire personnel to start-up Wildlife Management Program.
      ii. Create a Tribal Wildlife Action Plan that itemizes the specific activities, roles, and responsibilities.
   D. Plan to manage priority - develop program with Community wildlife experts and collaborate extensively with GRIC Rangers, while relying on Arizona's Wildlife Action Plan as a model.
   E. Assistance needed - funding to support full-time staff as well as any contractual assistance needed. Technical assistance will be sought from Arizona Game & Fish and the U.S. Fish and Wildlife Service when necessary.
4. **Enhance decision making tools**
   A. Determine each Program's needs
   B. Determine internal GIS capabilities and usage
   C. Consolidate needs and resources and establish a plan of approach
   D. Identify capacity building opportunities

Air Quality FY15 Priority

1. **Increase Program Capacity by Developing or Revising all Mechanisms Required to Implement and Enforce the Air Quality Management Plan**
   A. Description - Evaluate and update all program components, including technical documents, reports, permit language, databases, and the AQMP.
   B. Long-term Goal - To develop an efficient and technology-driven Air Quality Program that is sustainable for years to come.
   C. Intermediate Milestones:
      i. Issue air quality permits and reduce the backlog of facilities to be permitted
      ii. Develop logs to track permits, invoices, complaints, and inspections
      iii. Develop or revise all programmatic forms (Emission Inventory, Earth Moving Permit application, Non-Title V Permit application, monitoring forms)
      iv. Revise the AQMP.
      v. Full implementation of a newly created programmatic website to provide outreach resources to the public and regulated entities.
   D. Plan to Manage Priorities – The Air Quality Program will continue to use internal task lists and bi-weekly team meetings to track action items, conduct personnel work load leveling, and maintain progress with the program goals. Progress will be periodically shared with the program's Region 9 EPA Project Officer and the department's management team to support and aid in department initiatives.
   E. Assistance Needed - The Air Quality Program plans to obtain technical assistance from an outside consultant and law firm to help with the progression of issuing air quality permits and revisions to the AQMP. The AQP will also continue to utilize Community resources and elicit developmental

assistance from various GRIC departments such as Management Information Systems (MIS) for monitoring database management, Communications and Public Affairs Office (CPAO) for website development.

2. **Commence Developing Understanding Global Change, Particulate Levels and Health Vulnerability in the Gila River Indian Community and Greater Phoenix Metropolitan Airshed Project**
   A. Description - begin this three-year effort to ensure project success and completion within proposed time frame.
   B. Long-term goal - to develop a comprehensive and long-term understanding of the impacts of climate change in the Community—with the focus on concentrations of particulates from prehistoric times to 2050.
   C. Intermediate Milestones:
      i. Secure funding for staff, researchers, and project costs.
      ii. Develop extensive project and collaboration schedule.
      iii. Begin investigation and share initial findings.
   D. Plan to manage priority - this joint project between DEQ and Arizona State University will be co-managed through continual communication and sharing of information between the two partners and seek technical guidance from EPA when needed.
   E. Assistance needed - funding for staff, researchers, and equipment, along with technical expertise from EPA and others to interpret results and implications.

Pesticide Program FY15 Priority

F. Description - evaluate and update all Program components, including technical documents, reports, and databases.

Increase Program Capacity by Developing or Revising all Mechanisms Required to Implement and Enforce GR-05-14, Pesticide Code.

G. Description - Evaluate and update all program components including technical documents, reports, and databases.
H. Long-term Goal - To develop an efficient and technology-driven Pesticide program that is sustainable for years to come.
I. Intermediate Milestones:
   vi. Develop or revise all programmatic standard operating procedures
   vii. Develop or revise all programmatic forms
   viii. Develop or revise all programmatic guidelines to include Pesticide Management Areas and Integrated Pest Management guidance.
   ix. Develop or revise all programmatic training offerings to include Community Applicator and Worker Protection Standard certifications
   x. Full implementation of a newly created database system
   xi. Full implementation of a newly created programmatic website to provide outreach resources to the public.
J. Plan to Manage Priorities - The Pesticide Control Office will continue to utilize their internal project task listing which assigns priority levels to each component to ensure continual progress. Component progress will be shared with the program's Region 9 EPA Project Officer and the department's management team to support and aid in department initiatives.

K. Assistance Needed - The Office will continue to utilize Community resources and elicit developmental assistance from various GRIC departments such as Management Information Systems (MIS) for database development, Communications and Public Affairs Office (CPAO) for website development, and Land Use Planning and Zoning (LUPZ) for mapping development.

Waste Management Program FY15 Priorities

1. Complete Integrated Waste Management Plan

A. Description - complete GRIC DEQ's Integrated Waste Management Plan (IWMP) in order to create a blueprint of activities and plans to the Waste Program to follow in the next five years.
B. Long-term goal - update the IWMP as needed so it is always current and reflects the active waste management concerns of the Community.
C. Intermediate Milestones:
   i. Complete and submit a Draft IWMP Framework at end of FY13 for Tribal and EPA approval.
   ii. Collaborate with GRIC Department of Public Works (DPW) in areas where DEQ and DPW need to work together to set goals and priorities.
   iii. Host meetings with other GRIC departments, such as Housing, in order to ensure that their waste management concerns are included.
D. Plan to manage priority - involving all DEQ and other pertinent GRIC department in the planning process and ensure all waste management concerns are included in the IWMP.
E. Assistance needed - funding for any contractual efforts to assist with meeting facilitation and/or document preparation.

2. Increase Hazardous Waste Management Activities

A. Description - increasing the Hazardous Waste Management Program capacity in order to increase activities. The program is currently limited by the staff availability to conduct inspections.
B. Long-term goal - to inspect each regulated hazardous waste facility (generator) at least once every two years.
C. Intermediate Milestones:
   i. Secure funding to support one full time staff that will be trained to assist in inspection activities and hazardous and universal waste collection activities.
   ii. Ensure all staff receive adequate Hazardous Waste Training.
   iii. Inspect at least thirty (one half of the identified 27 active facilities and over 30 tracked facilities) during FY15.
   iv. Host a Household Hazardous Waste and Universal Waste Collection event - employing new cost-saving techniques.
   v. Work with conditionally exempt GRIC government agencies on proper waste handling and disposal strategies such that they are excluded from the Community HHW events, allowing additional cost savings to be captured in the waste events.
   vi. Update illegal dumpsite database.
   vii. Establish a meeting schedule with Tribal Rangers for opportunities to discuss current activities and issues, including enforcement updates.
D. Plan to manage priority - hire and train new inspector to assist in conducting facility inspections, increase outreach and education to the Community's residents, tenants, employees, and visitors on proper waste handling and disposal of hazardous and universal wastes, and providing an opportunity for Community residents to properly dispose of household hazardous waste.

E. Assistance needed - EPA can assist by providing joint on-site inspections of facilities—in order for DEQ staff to maintain and increase their level of proficiency while conducting waste inspections - while providing critical enforcement support when needed, funding to support an additional much-needed inspector, and funding or partially funding household hazardous waste collection event.

3. Increase Recycling Activities

A. Description – Provide curbside recycling services throughout the Community.
B. Long-term goal - provide curbside-recycling services to every home within the Community and government building and facility.
C. Intermediate Milestones:
   i. Complete a DEQ Recycling Plan that details Community outreach—steps and strategies—and opportunities to increase recycling efforts Community-wide.
   ii. Assist DPW in expanded curbside recycling service to Districts 1 and 4 on October 2, 2013. Once this occurs four (4) of the seven (7) districts will have curbside services.
   iii. Explore opportunities and host an electronic waste (e-waste) collection event.
   iv. Support DPW with funding requests and budget modifications as needed in order to expand recycling services.
   v. Analyze cost and statistics regarding waste collection options (such as one-to-one collection—one day waste, one day recyclables) in order to present findings to decision-makers.
D. Plan to manage priority - by increasing both outreach and recycling opportunities at the generation point, and consistently investigating new and improved recycling opportunities and methods.
E. Assistance needed - funding for increased capacity of DPW to provide adequate recycling services, as well as funding or donations for incentive programs to increase recycling participation.

Water Quality Program FY15 Priorities

1. Update Water Quality Program Regulatory Components

A. Description - Update the Wastewater Management Ordinance and complete the Groundwater Quality Ordinance.
B. Long-term goal - to have all necessary Water Quality Ordinances in place.
C. Intermediate Milestones:
   i. Finalize Wastewater Management and Groundwater Quality Ordinance for Community consideration and approval.
   ii. Implement ordinances.
D. Plan to manage priority - the Water Quality Team will develop and update these components and share all information with DEQ administration to aid in the DEQ Team Building and Strengthening the Administrative Capacity.
E. Assistance needed - legal reviews.

2. Restore the Pee Posh Wetlands

A. Description - utilize construction and vegetative methods to improve conditions at the Pee Posh Wetlands.
B. Long-term goal - improve water quality and wildlife habitat in the Pee Posh Wetlands.

C. Intermediate Milestones:
   i. Construct a sediment removal basin at the inlet of the Pee Posh Wetlands.
   ii. Enhance vegetation at the Pee Posh Wetlands.
   iii. Report findings.
D. Plan to manage priority - the Water Quality Team will work with federal entities to ensure proper permits and reporting of findings.
E. Assistance needed - funding for the construction of the sediment removal basin through an EPA grant, and technical guidance from the U.S. Army Corps of Engineers on 404 permitting issues.

3. Update Water Quality Program Data Management Systems

A. Description - Update the water quality database systems.
B. Long-term goal - to have a complete database with interface with GIS.
C. Intermediate Milestones:
   iii. Finalize development of database elements.
   iv. Expand use of EQuIS database to include GIS and mapping of water quality related data.
D. Plan to manage priority - the Water Quality Team will develop and update these components and share all information with DEQ administration to aid in the DEQ Team Building and Strengthening the Administrative Capacity.
E. Assistance needed - technical guidance from GRIC IT to update databases and from Land Use Planning and Zoning for GIS and mapping.

2.0 IDENTIFICATION OF EPA PROGRAM PRIORITIES & MANAGEMENT REQUIREMENTS

According to *Guidance on the Award and Management of General Assistance Agreements for Tribes and Intertribal Consortia* (May 15, 2013), EPA's Region IX Office should review the implementation of the following federal environmental statutory programs in GRIC and document these programs in this Plan:

1. GAP
2. Clean Air Act (CAA)
3. Clean Water Act (CWA)
4. Safe Drinking Water Act (SDWA)
5. Resource Recovery and Conservation Act (RCRA)
6. Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)
7. Emergency Planning and Community Right-to-Know Act (EPCRA)
8. Brownfields
9. Asbestos Hazard Emergency Response Act (AHERA)
10. Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)
11. Toxic Substance Control Act (TSCA)
12. Pollution Prevention Act

This review should include—as applicable—ongoing and anticipated program implementation activities such as permitting, compliance assurance and enforcement, developing inventories of regulated entities, issuing identification numbers for regulated entities, issuing certifications, and other activities.

3.0 AN INVENTORY OF REGULATED ENTITIES

Air Quality Program

In general, any facility that has emissions of greater than one (1) ton per year of a criteria pollutant (NOx, SOx, PM-10, CO, VOCs and Lead) must submit an *Air Quality Permit Application* to the DEQ after receiving a letter request from the Air Quality Program (AQP) on behalf of the Director. In addition, the permit application/submittal requirements also apply to any facility that emits more than 1,000 pounds per year of Hazardous Air Pollutants (HAPs) or more than 300 pounds per year of an Ultra HAP. These applications allow the AQP to prepare Non-Title V permits for the facilities. At this time, the EPA has not delegated authority to GRIC to issue Title V permits. The DEQ has applied to EPA for authority to implement the Title V operating permit program (Part 70), but the granting of authority is pending legal review of GRIC's submittal. **Table 1** below contains a list of facilities within the Community that are regulated by the AQP and their permitting status.

Table 1. Permitting Status of Facilities Regulated by the Air Quality Program (September 2014)

No.	*Corporation*	*Company*	*Permit Status*
1	GRSG M	Gila River Sand & Gravel	Completed
2	GRSG S	Gila River Sand & Gravel	Completed
3	GRSG S	Hanson	Completed
4	GRSG M	Maricopa Redimix	Completed
5	GRSG M	CEMEX	Completed
6	LBDC	Rock Solid	Completed
7	LBDC	Super Lite Block	Completed
8	GRSG S	CEMEX	In Progress
9	LBDC	Champion Homes	In Progress
10	LBDC	Therm-O-Rock	In Progress
11	GRSG M	Cal Portland	In Progress
12	LBDC	Love's Truck Stop	In Progress
13	WHPDA	Casa Blanca Market	Completed
14	WHPDA	Komatke Market	Completed
15	WHPDA	Gila River Service Station	Completed
16		Honeywell	On Hold
17	GRSG S	Arizona Materials, LLC	App. 5/13
18	GRSG S	Pioneer Landscaping Materials, Inc.	Deminimus
19	LBDC	General Chemical	In Progress
20	LBDC	Fertizona	Pending
21	LBDC	Wilbur Ellis	Pending
24	LBDC	Alexco	Pending
25	LBDC	Animal Nutrition Dairy Nutrition	Pending
26	LBDC	Arizona Box	Pending

Table 1. Continued - Permitting Status of Facilities Regulated by the Air Quality Program (September 2014)

No.	*Corporation*	*Company*	*Permit Status*
27	LBDC	Freightliner Sterling Western Star of Arizona	Deminimus
30	LBDC	Classy Closets	Pending
33	LBDC	DBCI	Deminimus
34	LBDC	Environmental Stoneworks	Deminimus
35	LBDC	Gila River Casino LB	Pending
38	LBDC	Kaiser Aluminum	Pending
39	LBDC	Stericycle	Pending
40	LBDC	Matrix Nutrition	Pending
41	LBDC	Pacific Scientific	Pending
44	LBDC	Pimalco	Pending
47	LBDC	Triax Turbine Components Casting Division	App. 5/13
49	LBDC	Rock-N-Roll Materials	Deminimus
50	LBDC	Triumph Engine -Tempe	App. 5/13
52	LBDC	Yulex Corporation	App. 5/13
53	LBDC	Triumph Fabrications - Phoenix	App. 5/13
54	LBDC	MTD	Pending
55	LBDC	Pima Valve	Deminimus
58	LBDC	Waste Management	Pending
60	WHPDA	Gila River Casino WHP	Pending
61	WHPDA	Gila River Casino VQ	Pending
62		Lone Butte Waste Water Treatment	Pending
63		Bayer (cotton seed delinter)	Pending
64		Gila River Farms Gin	Pending
65	WHPDA	Chevron	App. 5/13

Pesticide Program

In order to monitor the regulated pesticide activities being conducted within the Community, the Pesticide Control Office utilizes permitting, certification, and registration mechanisms. These mechanisms allow the Office to schedule routine compliance inspections of pest management businesses, growers, seed treaters in accordance with a neutral inspection scheme. The neutral inspection scheme allows for a non-arbitrary method of identifying inspection targets and the neutral selection of establishments for inspection. This Neutral Inspection Scheme was developed by the Office to meet or exceed the minimum requirements of the Community's Pesticide Ordinance and the EPA Pesticide Collaborative Cooperative Agreement Guidance requirements. All inspections shall be unannounced unless extenuating circumstances require scheduling.

The Pesticide Control Office uses the following criteria in selecting an activity for routine inspections. The targeting criteria designed in the NIS are to ensure:

- Equal treatment of all entities who conduct a pesticide regulated activity or operate a pest management business in the Community;
- Inspections occur on a regular and consistent basis; and
- No pesticide regulated activity, person, or pest management business is inspected at a greater frequency than others without justification.

Utilizing these criteria, a total of (124) unique targets which equate to (206) possible inspections annually were identified. Of those, (65) currently are permitted with the Office as outlined in Table 2 below.

Table 2. GRIC Pesticide Permit Holders (September 2014)

Permit Types	No.
Pest Management Business (Ag)	33
Grower	26
Seed Treatment	1
Custom Applicator	6
Pest Management Business (Non-Ag)	32

Growers	Permit No.
Button & Bohnee Farming Partnership	101
Catron Cotton Co.	102
Cruye & Ellis Blackwater Farms	103
Don Pew Farms	104
G & G Farms	106
Gila River Farms	107
Lamb Farms II	108
Lone Butte Partnership	109
Lucero Farms	110
M & G Farms	111
O & E Farms	112
Lewis Farms	114
Blaine Farms	116
RG Farms	117
AKE Farms	118
Ellis Farms	119
Wellington Farms	120
Davis Farms	121

James Wall	123
Global Native, LLC.	125
Green Acres Farms East	126
Matthews Ruiz, LLC	127
Snakehill Ranch	128
Coops Farm	129
Wayne Delowe	130
Rema Riggins Scott	131

Seed Treaters	Permit No.
Bayer Crop Science	601

Custom Applicator	Permit No.
B & BW Enterprises	201
Crop First Aviation	202
Custom Farm Service	203
Sarita Aerial	204
Hawkins Ag Service	208
Rod Buess Custom Spreading	209

Pest Management Business (Non-Ag)	Permit No.
AAA Landscape	401
Arizona Exterminating	402
Bee Control Specialists, LLC.	403
City Wide Pest Control	406
Contractors Termite & Pest Control	407
Desert Weed Control	410
Eco Lab	411
Toka Sticks Golf Club	415
Whirlwind Golf Club	416
Maricopa Flood Control District	418
Orkin Pest Control	420
SOS Exterminating	425
Sun Lakes Pest Control	427
Truly Nolen	431
United Exterminating	432
University Termite & Pest Control	443

Warriors Pest Control	434
Johnny Reeves Termite & Pest Control	437
Carter Weed Control	439
Western Exterminator Company	440
Bugs Bee Gone AZ Pest Control	444
Green Mango Pest Control	445
Industrial Fumigant Co.	446
Southwest Ground Control, LLC.	447
Bio-Chem Exterminating, LLC.	448
ADOT Landscape	451
Home Shield Termite & Pest Management	453
Burns Pest Elimination, Inc	454
GRIC Environmental Health Services	502
GRIC Facilities Maintenance (Landscape)	503
GRIC Dept. of Community Housing	504
GRIC Dept. of Rehabilitation & Supervision-Adult	506

Waste Management Program

Hazardous Waste Program

DEQ's long-term goal is to conduct inspections of all active hazardous waste generating facilities once every 2 years. There are 26 active facilities that generate hazardous waste. This includes thirteen (13) conditionally exempt small quantity generators (listed in **Table 3**), nine (9) small quantity (listed in **Table 4**), and four (4) large quantity generators (listed in **Table 5**).

There are additional facilities that are operating, but have not yet been inspected or have not yet determined their hazardous waste generation status (listed in **Table 6**). These facilities are listed in EPA Facility Registration System (FRS) for activities other than RCRA, or are otherwise known to DEQ, and are likely to utilize hazardous materials that may result in the generation hazardous wastes. DEQ will inspect 6 of these facilities in FY 2015.

Table 3. Inventory of Conditionally Exempt Generators (September 2014)

No.	*Facility/Generator Name*	*EPA ID Number*
1	Animal Nutrition Systems	AZD983479213
2	Bayer Crop Science (aka Feffer's Delinting)	AZD063269195
3	CNH – Proving Grounds (aka CASE)	
4	Freightliner Sterling Western Star of AZ	
5	Green & Grow, Inc.	
6	John-Deere Test Facility	
7	Local Motors	
8	Matrix Nutrition	AZD980880710
9	Memorial Airfield (aka T&G Aviation)	AZD982491409
10	Pacific Scientific Nadar Facility	None
11	Stericycle Inc	AZR000001776
12	Triumph Engineered Solutions (aka AMTI)	AZR000500561
13	Wilbur Ellis Company, San Tan	AZD983485004

Table 4. Inventory of Small Quantity Generators (September 2014)

No.	*Facility/Generator Name*	*EPA ID Number*
1	Bob Bondurant School of High Performance Driving	AZD983477415
2	Classy Closets (aka Gaston Copper)	AZD983474826
3	General Chemical (aka Chalum)	AZR000006189
4	Gila River Farms	AZR000037291
5	Honeywell San Tan Test Facility	AZD982014631
6	Kaiser-Alexco (aka Alexco)	AZR000505925
7	Kaiser Aluminum (aka Plymouth Tube)	AZD020691507
8	Pima Valve Inc	AZD982527772
9	Triax Turbine Components (aka Triumph Precision Casting)	AZR000502591

Table 5. Inventory of Large Quantity Generators (September 2014)

No.	*Facility/Generator Name*	*EPA ID Number*
1	Alcoa, Inc. - Pimalco Gila River Operations (aka Pimalco)	AZD982418204
2	Wild Horse Pass Motorsports Park (aka Firebird International Raceway Park)	AZD983479304
3	Pacific Scientific	AZD980818090
4	Triumph Engines-Tempe	AZ0000962530

Table 6. Inventory of Other Operating Facilities – RCRA Status to Be Determined (September 2014)

No.	*Facility/Generator Name*	*EPA ID Number*
1	Acker Stone Industries, Inc.	
2	Champion(/Redman) Homes	
3	City of Chandler – Lone Butte Wastewater Treatment Plant	EPA FRS: 110033009090
4	Ferrellgas (and Blue Rhino)	
5	Gila River Sand and Gravel, Maricopa Plant	
6	Gila River Sand and Gravel, Santan Plant	
7	GRIC Public Works Sacaton Transfer	
8	Hu Hu Kam Clinic D5	
9	Hu Hu Kam Memorial Hospital	
10	Lone Butte Casino	
11	Loves Travel Center	
12	Rawhide	
13	Rock Solid	
14	RV Superstorage & Boxrud RV	
15	Sheraton Resort Hotel	
16	Superlite Block	
17	Therm-O-Rock West	EPA FRS: 110009265570
18	Vee Quiva Casino	
19	Waste Management Lone Butte Transfer Station	
20	Wild Horse Pass Hotel and Casino	
21	Yulex Corporation	

Brownfields Program

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund) authorizes the EPA to respond to human health and environmental hazards posed by hazardous substances at properties. Under CERCLA, EPA can require liable parties to conduct cleanups or EPA can conduct a cleanup and subsequently seek cleanup costs from liable parties. Pursuant to cleanup opportunities, GRIC DEQ conducted a Community-wide survey to determine potential Brownfields.

DEQ conducted Phase I Environmental Site Assessments (ESA) at ten (10) sites to determine if the property is impacted by a recognized environmental condition (REC). A Phase I ESA includes: site visit, historical research (historical area photos, building permits, topographical maps, etc), geology and hydrogeology (when needed), regulatory research (fire departments, federal agencies), and interviews and document reviews (tenants, owners, regulators). **Table 7** lists the properties where Phase I Site Assessment have been conducted. When a Phase I ESA identifies a REC or the potential for soil contamination, a Phase II ESA is subsequently conducted to confirm the presence or absence of subsurface contamination. Phase II ESA includes: testing of soil, soil gas, and groundwater. **Table 8** lists the Phase I and Limited Phase II ESAs conducted within GRIC. **Table 9** lists the targeted Brownfields.

Table 7. Inventory of Phase I Assessment Properties (September 2014)

No.	*Facility/Generator Name*	*EPA ID Number*
1	Dela-Tek	AZD049315765
2	Tannery	AZD074441676
3	Image of Wicker	AZD982408809
4	Specialty Windows	
5	Fertizona (Blackwater)	
6	Casket Company	
7	LBIP Tract 3 A-B	
8	LBIP Entertainment	
9	CDI Transportation	
10	Air Force Space Command	

Table 8. Inventory of Phase I & Limited Phase II Assessment Properties (September 2014)

No.	*Facility/Generator Name*	*EPA ID Number*
1	Lone Butte Airstrip	
2	Marietta Farms	EPA FRS: 110033009090
3	AT&T Microwave	
4	Stoneville Pedigree	
5	Tyson Airstrip	
6	Murphy Airstrip	
7	O'Odham Airstrip	
8	Electro-Treatment	AZE100115001
9	Triple M Farms	
10	Memorial Airpark	
11	Rainbow Airstrip	
12	Snavely Forest Products	
13	Historic Mine Sites	

Table 9. Inventory of Targeted Brownfields Assessments (September 2014)

No.	*Clean Up Phase Sites - No Longer in Operation*	*EPA ID Number*	*Status/Inspected*
1	Tannery	AZD074441676	Brownfield/FY2012
2	Aerodyne		Brownfield/FY2011
3	Dela Tek	AZD049315765	Brownfield/FY2012
4	Electrotreatment	AZE100115001	Brownfield/FY2012
5	Romic Environmental Technology Corp	AZD009015389	RCRA Post-closure/FY2010
6	Memorial Airpark		
7	Blackwater Trading Post		

Water Quality Program

Two (2) federal laws designed to protect the quality of the nation's water—the Clean Water Act (CWA) and Safe Drinking Water Act (SDWA)—have significant roles in regards to water quality management in the Community. Section 518 of the CWA authorizes the EPA to allow tribes to assume full regulatory authority of EPA through delegation. The CWA and SDWA both use the same general criteria that a tribal nation must meet in order to be eligible to implement programs that a state can implement.

In 1989, GRIC applied for General Eligibility under Section 106 of the CWA. That application was approved in March 1990, making the Community the first tribe to be approved in Region IX. The 106 program allows tribes to apply for water pollution control grants. In February 2004, the Community received approval for eligibility under Section 319 of the CWA—allowing the Community to receive funding for nonpoint source management projects. DEQ's Water Quality Program carries out numerous monitoring, assessment, inspection, compliance assistance, and enforcement activities—of both surface and groundwater—to ensure these federal laws are upheld within GRIC. As part of these efforts, DEQ requires facilities to have the proper discharge permits and register all water re-use activities. **Table 10** is an inventory of the Waste Water Treatment Facility permits that the Program oversees. **Table 11** is an inventory of the facilities re-using water.

Table 10. GRIC's Waste Water Treatment Facilities (September 2014)

Date Issued	*Permit #*	*Facilities Included*	*Category*	*Issued to*
1/27/2014	W-TF-GP01-1-1	Blackwater Colony (D1) Blackwater (old)(D1) Goodyear (D4) Stotonic (D4) Bapchule (D5) Central Casa Blanca (D5) South Casa Blanca (D5) Sacate (D5) District 6 (St John's) (D6) District 7 (D7) Sacaton (D3)	Category IV Treated Sanitary WW	GRIC DPW
6/6/2011	W-TF-PWSC-1-0	District Three, Reclaimed WWF (Sacaton)	Category III Reclaimed WW	GRIC DPW

Table 11. GRIC's Water Reuse Registration (September 2014)

Date Issued	*Registration #*	*Type of Reuse*	*Issued to*
1/4/2010	W-RC-LBP-1-0	Agricultural Reuse for Non-Edible Crops	Lone Butte Partnership
2/18/2010	W-RC-TLF-1-0	Agricultural Reuse for Non-Edible Crops	Lamb Farms II
11/17/2009	W-RC-GRD-1-0	Diversified Reuse for Dust Control and Construction Activities	GRIIDD
5/1/2009	W-RC-GRF-1-0	Agricultural Reuse for Non-Edible Crops	Gila River Farms
2/18/2010	W-RC-TG-1-0	Diversified Reuse for Irrigation of Landscapes with Non Public Exposure	Troon Golf
2/8/2010	W-RC-GRF-2-0	Agricultural Reuse for Non-Edible Crops	Gila River Farms

4.0 IDENTIFICATION OF MUTUAL ROLES & RESPONSIBIILITES

Table 12 summarizes the roles and responsibilities of DEQ and EPA.

Table 12. Partner Roles and Responsibilities

Program	*DEQ Roles & Responsibilities*	*EPA Roles & Responsibilities*
Department of Environmental Quality - departmentally defined	1. Submit GAP online quarterly reports to EPA. 2. Submit grant applications to EPA. 3. Submit end of year documents, DBE MBE/WBE reports to EPA.	1. Assist in achieving environmental benefits in a pragmatic, collaborative way. 2. Provide more in depth training for grant application process and reporting requirements. 3. Assist in prioritizing environmental justice to ensure access to clean water, clean air, and opportunity is given to live, work, and play in a healthy Community. 4. Assist in enforcing laws & assuring compliance. 5. Assist in advancing sustainable development. 6. Assist in building resiliency to the effects of a changing climate.
Air Quality Program	1. Submit Air Quality Management Plan and Quality Assurance Project Plan revisions to EPA for review. (GRIC Law Office provides legal review) 2. Submit monitoring data and periodic status reports to EPA 3. Implement the AQMP – issue air quality permits and conduct compliance and enforcement 4. Operate and maintain the ambient air quality monitoring stations	1. Provide review and guidance on monitoring data collection, periodic status reports, permits, and compliance and enforcement activities. 2. Maintain or increase funding to enhance the Program's capacity to address additional operating permits, data collection, database development, and equipment upgrades. 3. Assist with the development of program goals and objectives
Pesticide Program	1. Submit grant application to the EPA.	1. Provide funding under the Cooperative

	2. Meet or exceeds all FY15 Pesticide Consolidated Cooperative Agreement deliverables and activities as identified in the FY 15 FIFRA Cooperative Agreement Grant Guidance and Work Plan. 3. Report quarterly progress to the EPA.	Agreement to support enforcement, compliance, training, development and special project activities. 2. Provide review, guidance, and approval on data collection and reporting.
Water Quality Program	1. Submit data, quarterly and annual reports, and other deliverables on all grant projects to EPA for review. 2. Submit all water quality data and wetland management reports to EPA for review.	1. Provide review, guidance, and approval on data collection. 2. Review and give final approval on the Treatment as a State application and surface water quality standards. 3. Provide funding for wetland and water quality monitoring activities.

Table 12. Continued - Partner Roles and Responsibilities

Program	*DEQ Roles & Responsibilities*	*EPA Roles & Responsibilities*
Waste Management Program	1. DEQ has a direct relationship with their counterpart inspectors at EPA Region IX—sharing case and regulatory information frequently. 2. Submit Program data, activities, and reports to EPA. 3. Participates in EPA training sessions.	1. EPA provides critical regulatory and enforcement support for the hazardous waste and other waste inspections that DEQ conducts. 2. EPA provides training opportunities. 3. The federal law and regulations are the critical foundation of the program. 4. Difficult enforcement and clean-up cases can also be significantly expedited with inspection and enforcement support from EPA. 5. EPA can help improve the hazardous waste program by continuing its support in two areas: 1) joint on-site inspections of facilities; and 2) funding/partial funding of our household hazardous waste collection event. Inspection support helps DEQ maintain its level of training and knowledge of inspection protocols and provides critical enforcement support when needed. Household hazardous waste support helps DEQ supplement the uncertainty of year-to-year GRIC funding. Eventually DEQ hopes GRIC can add an on-going budget line item for household hazardous waste disposal to ensure continued service.