



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUL 30 2007

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: Five Elements of a Tribal Integrated Waste Management Plan

FROM: Matt Hale, Director
Office of Solid Waste

A handwritten signature in black ink, appearing to read "Matt Hale", is written over the printed name of the sender.

TO: RCRA Directors, Regions I - X

PURPOSE:

The purpose of this memorandum is to identify the elements that the Office of Solid Waste (OSW) believes should generally be included in integrated waste management plans (IWMP) that are developed by tribes, unless information is provided that such element(s) are not appropriate or necessary, in order that such plans are counted in EPA's Annual Commitments System (ACS). We have worked closely with your staffs (as well as other federal agencies) in preparing this memo.

ELEMENTS OF A TRIBAL IWMP

The 2006-2011 EPA Strategic Plan established a strategic target of increasing the number of tribes covered by an IWMP. During meetings in Denver and Albuquerque last year, representatives from OSW, several regional offices, and other federal agencies discussed five elements which should generally be discussed in a tribe's IWMP, unless information is provided that such element(s) are not appropriate or necessary, and they drafted definitions for the elements. These elements represent the basic items that should generally be included in a tribe's IWMP for that plan to be considered adequate for GPRA purposes by EPA.

These definitions may assist you as you use your best professional judgment in evaluating whether such plans are counted in the ACS as contributing towards a region's attainment of its annual GPRA commitments for the IWMP performance measure. A plan that does not contain all five elements may be counted in the ACS if a region determines that one or more elements are not necessary for a tribe's situation (e.g., for very small tribes with small land masses). For example, an IWMP that indicates that the tribe has a contract or some other mechanism with a private party or local government to collect, transport and dispose of their waste, would be considered an acceptable plan and one that could be counted and included in the ACS. Furthermore, we recognize that the

level of specificity in a tribe's IWMP will vary depending on the tribe's needs. The five elements are:

1. Description of the community service area

This description can include the following: population and demographics, community assets and resources, households and housing, population projections, economy, climate, geography, and geology and natural resources. This background will provide valuable information when preparing later sections of the IWMP and also can be used to assess the needs in the local community service area. Defining the current and future community served by the waste management program is important to better address current and future waste management needs. Educational and cultural traditions in many communities can be used to the advantage of the waste management program by increasing awareness, pride, and community involvement to maintain a successful program. Specifically:

- Information about the number and location of households and housing clusters can be used as a basis for predicting rates of waste generation, assessing proposed alternatives, developing the fee structure, and predicting revenue.
- Population projections and related waste generation rates can be used to estimate the lifespan of available disposal facilities and to predict future needs of the waste program.
- Information about the local economy can be used to assess community-specific economic needs and to predict the specific waste management needs of industrial generators.
- Information about local climate conditions can determine the feasibility of waste collection, storage, transfer, and disposal plans.
- Geographic features can limit final disposal options and indicate special needs of the waste management program.
- Information about the geological and engineering properties of the surface and subsurface is important when considering landfill site selection, closure of existing dumps, and economic feasibility studies.

2. Description of the Tribe's waste management program structure and administration

Information about the tribe's program for administration and management provides a basis for decisions about long-term management plans to maintain a successful solid waste program. Among other things, a description of the tribe's codes and ordinances and related enforcement policies, that are important in maintaining compliance, should be provided.

3. Description of the Tribe's current and proposed waste management practices

This element describes the current and proposed waste management practices, to allow assessment of their strengths and weaknesses. A description of the current waste management practices should generally include information about:

- current waste sources;
- types and amount of waste generated (for the purpose of calculating tipping fees);
- estimated waste generation growth rates;

- methods for collecting, transferring and disposing of household hazardous waste, special waste, and hazardous waste;
- waste separation, reduction, and recycling practices;
- a description of facilities, regional infrastructure, and current partnerships, and
- a list of open dumps.

This description will clarify the elements of the existing program in order to determine which aspects are successful, as well as any aspects that should be improved in the future.

The proposed waste management practices should generally include information about:

- special considerations, limitations, and inefficiencies of the current program;
- equipment and facility needs;
- an alternatives analysis, including information about the cost and feasibility of the alternatives considered; and
- a description of proposed waste management practices, including information about the collection, transfer, and disposal of special and hazardous waste; waste reduction; potential partnerships; compliance and enforcement; community education; and implementation.

Information concerning the proposed partnerships, enforcement policies, community education and implementation will provide governing bodies and potential funding sources with evidence that the plan is well thought out and likely to be successful.

4. Description of the funding and sustainability and the long-term goals of the Tribe's waste management program

This element describes the tribal government's long-term goals and strategies for financing and sustaining an effective waste management program. This section also should show how the waste management program will effectively supply service to the community. A description of the sustainability and long-term goals of the waste management program demonstrates a commitment to providing continuous service.

5. Documentation of approval of the IWMP by appropriate governing body

Documentation of how and when the IWMP was approved or acknowledged and by what entity.

In the coming months, OSW, as well as those Regions that have prepared materials will make available additional tools to help develop and evaluate IWMPs. If you have questions regarding these five elements and their implementation, please contact Michaelle Wilson at 703-308-8790.

cc: Susan Parker Bodine, OSWER
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