



FLATHEAD INDIAN RESERVATION HOUSEHOLD HAZARDOUS WASTE: FUNDING STUDY FOR ANNUAL COLLECTION EVENTS

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Prepared for:

*Confederated and Salish Kootenai Tribes
Natural Resources Department
301 Main Street
Polson, Montana 59860*

Prepared by:

*NewFields Companies, LLC
700 Southwest Higgins Avenue
Suite 15
Missoula, Montana 59803*



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TABLE OF CONTENTS

1.0	INTRODUCTION	1
2.0	SOURCES OF INFORMATION	1
3.0	COMMUNITY NEED.....	2
4.0	BENEFITS	2
5.0	COSTS.....	2
6.0	FUNDING SOURCES AND MECHANISMS	3
6.1	INTERNAL FUNDING (CSKT)	3
6.1.1	<i>CSKT General Operating Budget</i>	<i>3</i>
6.1.2	<i>Tribal Water Quality District (WQD) or Ballot Initiative</i>	<i>3</i>
6.1.3	<i>Support from Tribal Business Entities</i>	<i>3</i>
6.1.4	<i>Funding from Fees and Fines</i>	<i>4</i>
6.2	EXTERNAL FUNDING (NON-CSKT)	4
6.2.1	<i>Private Sources.....</i>	<i>4</i>
6.2.2	<i>Public Sources - Tribal, State, and National</i>	<i>5</i>
6.2.3	<i>Public Sources – Local and Regional</i>	<i>6</i>
7.0	HHW EVENT FEASIBILITY.....	6
8.0	REFERENCES	7

LIST OF TABLES

Table 1.	Selected Costs Associated with HHW Collection Events.....	2
Table 2.	CSKT-Affiliated Businesses	4



1.0 INTRODUCTION

A Tribal Hazardous Waste Management Program grant from the Environmental Protection Agency (EPA) to the Confederated Salish and Kootenai Tribes (CSKT) provided funds to support the first known CSKT-sponsored household hazardous waste (HHW) collection event on the Flathead Indian Reservation in northwestern Montana. Similar events occur regularly in the off-Reservation Montana communities of Missoula, Bozeman, Billings, Kalispell, and Helena. The Reservation includes portions of four Montana counties: Lake, Sanders, Missoula, and Flathead. The majority of the Reservation is within Lake and Sanders counties. The HHW collection event was held in August 2019 in Pablo, Montana.

HHW consists of unused household products that contain corrosive, toxic, ignitable, and/or reactive ingredients. In general, these are post-consumer materials that should not be disposed of in municipal landfills. Household wastes are excluded from the Resource Conservation and Recovery Act (RCRA), which is the federal law governing industrial and commercial hazardous wastes.

This was a one-time EPA grant, and additional financial support would be needed to continue to collect HHW. The purposes of this study are to: 1) identify potential funding sources and mechanisms that could support the ongoing collection of such materials; and 2) evaluate the feasibility of hosting ongoing collection events on the Reservation. The goal is to expand local hazardous waste collection from a one-time effort to a permanent annual event.

2.0 SOURCES OF INFORMATION

NewFields completed a literature search to identify similar types of funding studies that have been completed. No identified documents addressed the feasibility of funding a permanent annual HHW collection event. Several recent studies evaluated the feasibility of constructing and operating permanent facilities for the collection of HHW (Albanese, 2012; MET, 2012; Patrick Engineering, 2009; Stein, et al., 2014). This report draws upon these sources of information as well as several other documents (EPA, 2003; EPA, 2007; EPA, 2014; St. Regis Mohawk Tribe, 2011).

We reviewed solid and/or hazardous waste feasibility studies for the following municipalities and regions: Gilbert, Arizona; Mesa, Arizona; Albuquerque, New Mexico; the counties of Butte, Marin, and Santa Barbara, California; Tulsa, Oklahoma; Peoria County, Illinois; and the region of East-Central Illinois. This analysis also benefited from discussions with staff at the Missoula Valley Water Quality District, the principal organizer of the annual hazardous waste collection event held in Missoula, Montana. We also incorporated knowledge and experience gained during the First Annual Flathead Reservation waste collection event in August 2019.



3.0 COMMUNITY NEED

Many HHWs enter surface water features, groundwater, soil, and/or the atmosphere each year due to improper disposal. Chemicals can be directly placed into surface waters or storm sewers, disposed with regular household wastes, burned, poured into septic and sanitary sewer systems, or illegally dumped on bare ground. Groundwater can be impacted via landfill leachate or direct infiltration. In some cases, atmospheric pollution can occur if the materials are volatile. HHWs that are improperly stored or disposed in homes or on private property can cause human health problems. In addition, improper handling of HHWs during or following disasters can result in human health or environmental impacts. Without options for reservation-area homeowners to dispose of HHW responsibly, significant risks of environmental contamination and human health impacts will remain.

4.0 BENEFITS

An annual HHW collection event would provide an important service to the Flathead Reservation community by reducing pollution from households that would otherwise make their way into the environment and/or cause human health problems. Long-term benefits to the CSKT include:

- Increasing general public awareness of HHW found in homes;
- Reducing exposure to and potential injury from HHW in homes;
- Increasing public knowledge of impacts to human health and the environment from HHW;
- Enhancing public awareness of prudent hazardous waste management practices;
- Preventing HHW from entering soil, surface water, groundwater, and air;
- Reducing danger to sanitation workers; and
- Promoting a positive image of waste reduction and recycling in the community.

5.0 COSTS

Sustainable sources of funding will be required to organize and implement a HHW collection event on an annual basis. Potential costs may include, but are not limited to, those shown in **Table 1**.

Planning	Permit Fees	Safety equipment
Promotion	Insurance	Technical / legal consultations
Advertising	Personal protective equipment	Spill cleanup equipment and supplies
Education	Traffic control	Employee and volunteer training
Participant Surveys	Employee labor	Containerization, transport, and disposal

Table 1. Selected Costs Associated with HHW Collection Events



6.0 FUNDING SOURCES AND MECHANISMS

This section presents possible sources of funds that could support an annual HHW collection event, and describes the mechanisms by which the funding could be obtained and used. Although the focus of this study is the HHW collection event, sources of funding that address long-term waste management planning on the Flathead Reservation have also been included. It is our hope that, by issuing this study, the positive influence of the EPA-funded program will outlive the brief grant period. EPA publications indicate that most tribes require a combination of several internal and external funding mechanisms to support their solid waste programs, including management of hazardous wastes.

6.1 INTERNAL FUNDING (CSKT)

6.1.1 CSKT General Operating Budget

Some tribes support HHW collection events using general operating funds provided by the tribal government. The Tribal Council could vote on a resolution to set aside CSKT general operating funds to support the annual HHW event.

6.1.2 Tribal Water Quality District (WQD) or Ballot Initiative

Local WQDs have been established in several Montana counties to preserve, protect, and improve the quality of surface water and groundwater within each district. In a similar manner, CSKT could explore the possibility of forming an internal WQD or similar organization that could provide funds to support an annual waste collection event. Reducing the volumes and quantities of hazardous substances that are improperly disposed will help fulfill the purpose of a tribal WQD. In the absence of creating a formal WQD, the CSKT could propose a hazardous waste collection fee through a CSKT ballot initiative.

6.1.3 Support from Tribal Business Entities

The CSKT own and operate several businesses as shown in **Table 2**. Collectively, these businesses have been successful at the local, national, and global scales. Financial commitments of support for an annual HHW collection event that serves Flathead Reservation residents could be a meaningful way to give back to the community.



Business Name	Market/Service/Product
S&K Aerospace	Project logistics management and supply chain solutions
S&K Global Solutions	Professional services company that supports over 20 federal agencies
S&K Logistics	Logistics services to government agencies and international allies
S&K Engineering & Research	Professional technical and engineering services
Adelos, Inc.	Research and development of fiber optic sensors
S&K Electronics	Cable/wire harnesses, circuit cards, electromechanical assemblies
KwaTaqNuk Resort & Casino	Hotel, casino, restaurant, events, meetings
Gray Wolf Peak Casino	Montana's largest casino, restaurant, events
S&K Gaming, LLC	Operates KwaTaqNuk, Gray Wolf, and two marinas
Eagle Bank (S&K Bancorp)	Tribally-owned bank
Energy Keepers, Inc.	Management of Kerr Dam

Table 2. CSKT-Affiliated Businesses

6.1.4 Funding from Fees and Fines

Some tribal governments impose fees on the sale of products on their reservations. Examples of such products may include gasoline, alcohol, tobacco, and fireworks. If such fees are collected on the Flathead Reservation, proceeds may be used to support waste collection. As part of the grant that supported development of this report, the CSKT is developing a hazardous waste ordinance. If a fee structure is set up as part of the enforcement mechanism within the ordinance, any fines collected could be used to support future HHW collection events.

6.2 EXTERNAL FUNDING (NON-CSKT)

6.2.1 Private Sources

Several non-governmental organizations and companies may be able to sponsor an annual HHW event. These include, but are not limited to, the following:

- Corporations:
 - Republic Services provides waste management services in western Montana. Wastes collected on the Flathead Indian Reservation at the Lake County Transfer Station are transported to the Missoula Landfill for final disposal. Republic may be interested in sponsoring or supporting future HHW collection events on the Reservation in order to reduce the quantities of hazardous wastes that are disposed of at its Missoula facility. Republic provides both a Community Grant Program and a Neighborhood Promise Program to support the communities it serves. Further information is available at: <https://www.republicservices.com/communities/charitable-giving> or by contacting Mr. Chad Bauer, Republic's Municipal Manager, at 532-5120.
- Grants or loans from private foundations, organizations, and families:
 - The Dennis and Phyllis Washington Foundation provides grants to 501(c)3 non-profit organizations for projects related to Health and Human Services as well as education and community service. For more information, see the following web site: (<https://www.dpwfoundation.org/grants/>)



- The Robert Wood Johnson Foundation provides a variety of grants and grant programs related to improving health outcomes. For more information, please visit: <https://www.rwjf.org/en/how-we-work/grants-and-grant-programs.html>.

6.2.2 Public Sources - Tribal, State, and National

Federal Grants and Loans

In general, federal grants do not fund operation and maintenance of tribal waste programs or facilities. Some agencies offer financial assistance for hazardous waste management projects. Most of the grants and loans available provide monies for planning, outreach, education, construction, and/or equipment purchase. Notes on potential federal funding sources are listed below.

- Indian Health Service. The IHS may provide grants to support this type of project. The IHS Tribal Management Grant Program is a potential opportunity. Further information can be found at: <https://www.ihs.gov/odsct/tmg/>
- The Indian Environmental General Assistance Program (IGAP) may be a source of funds. More information is available at: <https://www.epa.gov/tribal-lands/indian-environmental-general-assistance-program-gap>.
- The U.S. Department of Health and Human Services (DHHS) Administration for Native Americans provides funding for Environmental Regulatory Enhancement (ERE). For further information visit: <https://www.acf.hhs.gov/ana/grants/funding-opportunities>
- U.S. Department of Agriculture (USDA) Rural Development provides Solid Waste Management Grants for tribes. More details are available at: <https://www.rd.usda.gov/programs-services/solid-waste-management-grants>
- The U.S. Department of Housing and Urban Development (HUD) has a Healthy Homes Grant Program. More information is available at: https://www.hud.gov/program_offices/healthy_homes/hhi
- The EPA provides funding in the form of grants, cooperative agreements, and interagency agreements to assist tribes with management of HHW. The most applicable funding source is the grant that funded this project; the EPA is unlikely to provide an ongoing source of funds to support an annual collection event.

Tribal Waste Management

The Tribal Waste Management Funding Resources Directory is a searchable resource listing financial waste management assistance sources (grants, loans, cost-sharing) available to tribes and nonprofit organizations. Searches can be completed at the following web site:

<https://www.epa.gov/tribal-lands/tribal-waste-management-funding-resources-directory>



State of Montana

Potential state funding sources are listed below. Additional state resources may also be available.

- The Montana Department of Commerce's Community Development Block Grant (CDBG) and Indian CDBG could support the construction of a permanent HHW facility. Further information is provided at: <https://comdev.mt.gov/Programs/CDBG/Facilities/Applying>
- The Montana Department of Natural Resources and Conservation's Renewable Resource Grants and Loans (RRGL) Program provides fund for solid waste improvement projects. Details are at:
- <http://dnrc.mt.gov/divisions/cardd/resource-development/renewable-resource-grant-program>

6.2.3 Public Sources – Local and Regional

Local Water Quality District (WQD)

WQDs have been established in Lewis and Clark, Missoula, Silver Bow, and Gallatin counties. WQDs are created pursuant to state statute. The districts are formed by county governments, and funding is derived from annual fees on all properties that use water or produce waste. Other counties, including Flathead, Ravalli, Yellowstone, and Lake, have explored the option of forming a WQD. Brief discussions with Montana DEQ staff do not indicate that Lake County (where the CSKT HHW event was held) is currently considering a WQD. Reducing the amount of hazardous wastes that are improperly disposed will help fulfill the purpose of a WQD. However, overlapping jurisdictions (CSKT and Lake County) and public opposition may represent challenges to forming a WQD in Lake County.

Fees Associated with Solid Waste and Water Treatment

Lake County operates both a Transfer Station and a Landfill in Polson. The Sanders County Solid Waste Refuse District serves the communities of Dixon and Hot Springs. These entities could provide direct financial support to the event with the goal of reducing the volumes of wastes that ultimately enter each facility. A surcharge added to transfer station fees and/or landfill tipping fees could be reserved to support the HHW event. Proceeds from the sale of recycled products or defrayed costs from reuse of waste oil collected at these facilities may represent another resource. Alternatively, a fee could be charged in association with solid waste collection services. Fees from local water utilities and wastewater treatment plants may represent other sources of revenue.

7.0 HHW EVENT FEASIBILITY

As noted above, a variety of potential sources of funds are available to support an annual HHW collection event on the Flathead Indian Reservation. These include public and private funds; funds from tribal, local, state, and federal governments; CSKT and non-CSKT funds; and financial and in-kind support. We believe that a combination of these funding mechanisms could be used on an annual basis to support a HHW collection event. A significant effort would be required on the part of the CSKT and partner organizations and agencies to identify, target, and secure such resources. The funding package would likely be secured over a period of months. The success of such an effort would depend on identifying one or more champions within the CSKT Natural Resources Department that would be the driving force for the event each year.



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