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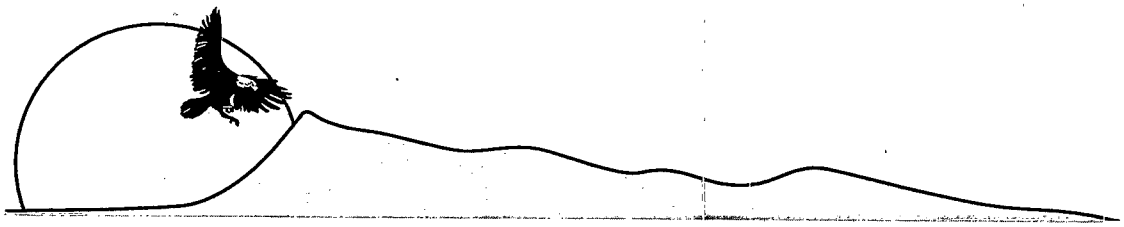

A RCRA Information Exchange

AROUND THE REGIONS

EPA Administrator

Featured Speaker at Cherokee Conference

HIGHLIGHTS

- EPA Administrator Featured Speaker
- EPA Assists Navajo-Zuni
- New Home for American Indian Environmental Office
- Terry Williams Named Director of AIEO
- Tribal Subtitle C Rule
- EPA Proposes Tribal Authority Over Air Resources
- Recycling Project Searches for Gold
- Alaskan Court Imposes "Green" Sentence
- Bulletin Board

EPA Administrator Carol M. Browner was the featured speaker at a banquet marking the closing of the Second National Tribal Conference on Environmental Management, held in Cherokee, North Carolina, May 23-26, 1994, and hosted by the Eastern Band of Cherokee Indians. Elliot Laws, EPA's Assistant Administrator for Solid Waste and Emergency Response, opened the conference, sharing the podium with Cherokee Chief Jonathan Taylor and EPA Region 4 Administrator John Hankinson.

The conference attracted nearly 450 representatives of Tribal governments, Federal and state agencies, and industry and citizen groups. Over 100 tribes were represented.

The conference agenda covered a wide variety of topics, most of which were suggested by the tribes. Sessions included presentations on a variety of air, water, and waste issues, building tribal capacity to manage environmental programs, environmental equity and grants. Tribal representatives participated on a number of panels during these sessions and provided valuable input to the topics at hand.

The conference also attracted a number of vendors of environmental services and products. Of particular interest was "Partners for Recycling", a permanently mounted exhibit housed inside a recycled, over-the-road 45-foot trailer. EPA Region 4 provided funding for the exhibit.

In her speech, Browner spoke of a "new generation of environmental protection," one that, among other things, is moving away from a "one-size fits all" regulatory scheme to one that is flexible, innovative and makes use of common sense. This new generation empowers those that must live with environmental decisions to have the opportunity to "work with us to make those decisions." She admitted that EPA needs "a new way of working with you--with the 545 tribes--even as you yourselves enter a new generation of economic power, population growth, and political clout."

Browner also told the audience that she had reaffirmed EPA's Indian Policy, that she intended to establish an Office for Indian Affairs at EPA headquarters, that tribes would be more involved in the Agency's budget process and that she aims to strengthen tribal involvement throughout EPA's operations.

In closing, Browner said, "Native culture and religion have always understood that we do belong to the community of the land. This is why America's tribes have a unique role to play--in helping all Americans to treat this wonderful land of ours with love and respect." ■

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Second National Tribal Conference on Environmental Management

May 23-26, 1994, Cherokee, North Carolina

EPA Assists Navajo-Zuni Cooperative Recycling Project

EPA's Region 9 office (San Francisco) recently awarded a grant to the Navajo Nation and the Pueblo of Zuni to develop a plan for a cooperative recycling program, believed to be the first of its kind in the country.

The Navajo-Zuni recycling initiative will be designed to address everything from the collection of recyclables to the marketing of processed materials. The program will expand on the Pueblo of Zuni's existing full-scale recycling center and will cover areas of northwestern New Mexico and northeastern Arizona. Once in operation, the program will employ members of both tribes. The initial commodities that will be included in the program are aluminum, steel cans, cardboard, newsprint, and glass.

The cooperative nature of this project extends beyond the involvement of the two tribes and the Region 9 solid waste program. Other organizations providing support and assistance to make the regional recycling initiative a success are the Navajo Area Office of Indian Health Serivices, the Southwest Public Recyling Association and the Southeastern Colorado Rural Recycling Project. The solid waste program hopes to work more closely with other tribes in Region 9 in the near future to promote waste reduction activities on tribal lands.

(Contact: Donna Orebic, EPA Region 9, 415-744-2092) ■

INSIDE EPA

Terry Williams

Named Director of American Indian Environmental Office

At a September 14, 1994, meeting of the Tribal Operations Committee (TOC) in Washington, DC, EPA Administrator Carol M. Browner named Terry Williams, the Executive Director of Fisheries and Natural Resources for the Tulallip Tribes in the State of Washington, director of the Agency's new American Indian Environmental Office. In announcing the selection of Williams, a member of the TOC, Browner said "Terry has been a consistent, strong and effective advocate for tribal sovereignty, environmental protection in Indian country, and the meaningful participation of tribes in natural resources decisions at all levels of government. I look forward to having him join my senior management team."

In his new position, Williams will work closely with the Adminstrator and senior managers of all the Agency's programs, both at the Headquarters and Regional office levels, to ensure that EPA's tribal operations are strengthened across the board. Williams will also serve as National Indian Program Coordinator, the position formerly held by Martin Topper in the Office of Federal Activities.

Since 1985, Williams has served on the Northwest Fisheries Commission and chaired the Commission's Environmental Policy Committee since 1990. He has represented the tribes on the Pacific Salmon Commission and in implemenation of the President's Forest Plan. He has served on the Boards of many environmental and research organizations, including the Center for Streamside Studies and the Adopt-a-Stream Foundation. The Governor of the State of Washington appointed Williams to the Board of the Puget Sound Water Quality Authority and the Governor's Wetlands Advisory Committee.

Williams is married and has three children. He will begin working full time at EPA Headquarters in Washington, DC, on October 24th. ■

Office of Water

New Home of American Indian Environmental Office

EPA Administrator Carol M. Browner announced, in an August 19, 1994, letter sent to all tribal leaders, that "To give the new office [the American Indian Environmental Office] a strong start, I am locating it in the Office of Water, one of EPA's largest programs and a program that has a breadth and depth of resources. The office will be postioned to draw upon the Office of Water's considerable expertise and experience in managing grant programs, authorizing and supporting state, tribal and local regulatory programs, and working with regions and tribal governments on program delivery."

Although Browner considered other options, she said that "...placement in an office with operational program delivery experience ensures the strong base necessary to build a successful, permanent program."

Bob Perciasepe, the Assistant Administrator for Water, said that it was a "special honor" for Water to have been selected as the host Office and pledged to work with Terry Williams, the new Office director, to ensure the Office's success. ■

Rule Proposes Tribal Authority Over Air Resources

EPA recently published, on August 25, 1994, in the *Federal Register*, a proposed rule which specifies provisions of the Clean Air Act (CAA) for which Indian tribes may be treated in the same manner as states. The public comment period for this rule, Indian Tribes: Air Quality Planning and Managment, expires November 23, 1994.

The proposed action adopts EPA's recent "streamlined" eligibility process ("TAS") and provides that tribes will be treated in the same manner as states for virtually all CAA programs. In addition, the proposal grants tribes with EPA-approved CAA programs authority over all air resources within the exterior boundaries of a reservation, including non-Indian owned fee lands. For off-reservation areas, tribes would need to demonstrate the basis for jurisdiction.

The proposal seeks tribal comments on the appropriate level of tribal grant match for CAA Section 105 grants; on establishing a phase-in period for tribes to meet whatever grant match is ultimately required; and, the feasibility of developing a sliding scale to determine tribal grant match based on ability to pay.

Comments on this rule may also be filed electronically, as EPA is participating in a White House Task Force pilot project on electronic filing of public comments. Instructions for filing electronically are included in the rule.

(Contact: Tina Parker, EPA/HQ, 202-260-6584) ■

INSIDE OSW

Tribal Subtitle C Authorization Rule Making *Real* Progress

OSW hopes to come to workgroup closure later this fall on a proposed rule that would make tribal governments eligible to obtain authorization *and* funding from EPA to implement RCRA Subtitle C hazardous waste programs in lieu of EPA.

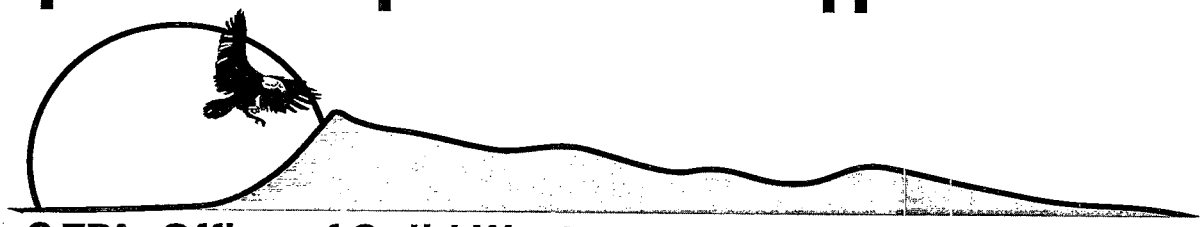
In general, tribes must meet the same criteria as states to obtain authorization. However, recognizing the uniqueness of tribes and Indian Country, the proposed authorization process for tribes differs from that of states in several areas:

- "Partial program" authorization will be available to tribes, an option not currently available for states; however, any partial program must have "minimum" program requirements;
- A tribe must include, in its application, a map, legal description or other information identifying the full extent of the lands over which it is asserting jurisdiction;
- A tribe must identify, in its application, the location of any facility subject to the tribe's Subtitle C jurisdiction, including any facilities on fee lands owned by non-Indians;
- A tribe would be required to submit a Tribal Legal Certification in place of the Attorney General's Statement that EPA requires from states;
- The Memorandum of Agreement in the application must include provisions for the referral of cases to EPA for enforcement if the tribe is unable to enforce due to the Indian Civil Rights Act; and
- Tribes would ***not be*** exempt from the requirements to provide certain financial assurances for closure and post-closure care and the payment of third-party liability claims. However, the rule asks for comments on developing alternative financial mechanisms for tribes, possibly similar to EPA's recently proposed Local Government Financial Test (LOGO) for municipally owned/operated solid waste landfills.

(Contact: Virginia Phillips, EPA/HQ, 703-308-8761) ■

NOTE: With this issue of the *Native American Network*, OSW begins a series of informational inserts designed to assist tribes in better understanding Subtitle C and hazardous waste program authorization under the rule. The first two inserts of this series, the "TRIBAL PROGRAM ADVISORY," focus on "What is a Hazardous Waste" and "Funding Tribal Hazardous Waste Programs." If your issue does not contain these inserts, please contact Judi Kane at 703-308-8644.

TRIBAL PROGRAM ADVISORY



EPA Office of Solid Waste Number 1

What is a Hazardous Waste Under RCRA Subtitle C?

Do you suspect that there may be material on your lands which is -- or might be -- regulated under RCRA Subtitle C? This advisory will help you determine which, if any, Subtitle C regulations apply and whether you should seek hazardous waste program authorization to manage these wastes and the activities (storage, treatment or disposal) associated with them.

Whether a material is considered a "hazardous waste" under the Subtitle C regulatory program has nothing to do with the common understanding of the term "hazardous waste." There is a specific regulatory definition, including numerous exclusions, which must apply before certain wastes or facilities are subject to Subtitle C. Most of these definitions are contained in 40 CFR Part 261.

To be classified as a hazardous waste, the material must be first a solid waste. Again, what is a "solid waste," has nothing to do with the common understanding of the term. Rather, by statute (RCRA section 1004(27)), a "solid waste" is either garbage, refuse, or sludge, including solid, liquid, semi-solid or contained gaseous material. In other words, under Subtitle C of RCRA, a "solid waste" can either be a solid, liquid or gas.

In addition, the "solid waste" must meet the regulatory definition of "waste." To be a waste the material must be a "discarded material." This means it must be material which is abandoned, recycled, or inherently waste-like. Each of these terms is defined further in 40 CFR 261.2 (a) - (e).

So generally, solid waste is a solid, liquid, or contained gas which is discarded, has served its intended purpose or is a manufacturing or mining by-product. However, even if you have material that meets this definition, there are several exclusions that may apply to the material and, thus, take it out of the Subtitle C regulatory scheme.

Briefly, these exclusions include a number of common solid wastes that do not present a significant threat to human health or the environment or that are already regulated under

other environmental programs. Exclusions include domestic sewage; industrial wastewater discharges; and source, special nuclear, and by-product radioactive material. The language excluding these wastes from RCRA regulations is contained in 40 CFR 261.4(a).

If the material meets the definition of "solid waste" as defined in the statute and 40 CFR Part 261, and is not excluded from the definition, the next step is to determine if it is a "hazardous waste."

To be a hazardous waste, the waste material must not be excluded from regulation as a hazardous waste *and* must meet one of the following conditions: it must be listed in a list of hazardous waste which EPA has included in 40 CFR 261.30 - 261.33, or it must exhibit a characteristic of a hazardous waste which is defined in 40 CFR 261.20 - 261.24.

EPA developed three lists of hazardous waste which can be found in 40 CFR 261.31, 261.32, and 261.33. Wastes listed in §261.31, are nonspecific source wastes, which are mainly manufacturing and industrial wastes. Wastes listed in §261.32, are specific source wastes, which consist of wastes from specifically identified industries such as wood preserving, petroleum refining, and organic chemical manufacturing. These wastes typically include sludges, still bottoms, waste waters, spent catalysts, and residues. Wastes listed in §261.33(e) and (f) are known commonly as "P" and "U" wastes which consist of specific commercial chemical products, or manufacturing chemical intermediates. This list includes chemicals such as chloroform and creosote, acids such as sulfuric acid and hydrochloric acid and pesticides such as DDT and kepone.

In addition to listing hazardous wastes, EPA identified four characteristics of hazardous waste: ignitability, corrosivity, reactivity and toxicity. Examples of ignitable wastes include waste oils and used solvents. Examples of corrosive wastes include acidic wastes and used pickle liquor. Examples of reactive wastes include water from TNT operations and used cyanide solvents. The toxicity of hazardous waste is determined by using a test that simulates the leaching actions that occur in landfills. An extract of the waste is analyzed and if the concentrations of specific toxic contaminants exceed the levels allowed in the regulations then the waste is classified as hazardous.

Finally, under the Subtitle C regulatory scheme, there are exclusions for hazardous wastes. Language excluding these wastes from RCRA regulation is contained in 40 CFR 261.4(b). Examples include but are not limited to: household waste, solid waste returned to the soil as fertilizers, various chromium-containing wastes, and discarded aresenical-treated wood. Certain residues of hazardous waste in empty containers also are excluded from regulation as are some secondary materials when they are recycled using certain procedures.

Remember, to be a hazardous waste, a material must first be classified as a solid waste, then it must be either a listed or characteristic waste, and NOT excluded by any of the regulations.

[For more information, contact Ginny Phillips, EPA/HQ, 703-308-8761]

TRIBAL PROGRAM ADVISORY

EPA Office of Solid Waste Number 2

Funding Tribal Hazardous Waste Programs

EPA is nearly finished drafting a proposed Tribal Hazardous Waste Authorization Rule. The draft has generated several questions on how money received under section 3011 of RCRA (the section that authorizes state and future tribal hazardous waste program funding) can be used.

This insert addresses the following questions:

- What is the relation of RCRA Subtitle C and Subtitle D to section 3011 funding?
- What kind of EPA grant oversight should tribes expect?
- What funding is available and what is the grant cycle?

Subtitles C and D

In order for EPA to issue grants for solid waste activities, the Agency must have clear statutory authority. Currently, there are two sections of RCRA that give EPA this authority: Section 8001 and Section 3011. Today, most tribes receive funding for RCRA solid waste activities under Section 8001.

You should be aware that while Section 8001 funds can be used for either Subtitle C (hazardous waste) or Subtitle D (solid waste) activities, Section 3011 funds, *by statute*, can only be used for Subtitle C activities.

Currently, funding under Section 3011 for hazardous waste activities is available **only** to authorized states and U.S. territories. However, when the Tribal Hazardous Waste Authorization Rule is promulgated, tribes that obtain hazardous waste program authorization **will be eligible** for funding under the authority of Section 3011.

Funds allocated to a tribe under Section 3011 may be used to develop and/or implement an authorized hazardous waste program, but may *not* be used to clean up waste or for construction-type activities.

EPA Oversight

Generally speaking, EPA oversight of hazardous waste management grants issued to tribes with authorized RCRA hazardous waste programs should be comparable to oversight for other grants that tribes receive from EPA, i.e., there will still be distinct application requirements as well as funding accountability.

However, there may be an increase in EPA oversight as a result of the annual Regional hazardous waste grant negotiation process. During these negotiations, Regions compare anticipated as well as past accomplishments to determine whether authorized programs (and the funding associated with these programs) are supporting activities that, in turn, support EPA's objectives for the RCRA program. These objectives are stated in the OSWER Strategic Plan and include:

- Minimizing the quantity and toxicity of waste;
- Ensuring environmentally sound management of solid and hazardous wastes; and
- Preparing for and responding to in a timely and effective manner the releases of hazardous materials in the environment.

Annual Grant Cycle

The annual grant negotiation process described above is part of an overall grant cycle that is important to any tribe considering applying for RCRA hazardous waste program authorization.

Funds under section 3011 are appropriated annually by Congress. The FY 1995 appropriation is $98,899,700 for the year starting October 1, 1994, and ending September 30, 1995. How did EPA receive that appropriation? The answer goes back fifteen to eighteen months.

During the summer of 1993, EPA started developing funding requirements for the Agency. This included a requirement for funding under Section 3011. This budget request was presented to the Office of Management and Budget (OMB) for evaluation and approval. OMB sent that request back to EPA with revisions in late November, and the Agency, in turn, prepared its final budget, which was submitted to Congress in January of 1994. This budget is enacted by Congress in the form of an appropriations bill.

A tribe's most important issue relating to the budget cycle is one of planning. The negotiation process we have discussed generally begins in June preceding the beginning of the fiscal year. Negotiations for the FY 95 allocation, therefore, began in June of 1994. To be prepared for those negotiations, you should be planning at least six months, and ideally eighteen months ahead of the anticipated budget period.

[For more information, contact Newman Smith, EPA/HQ, 703-308-8757.]

BULLETIN BOARD

Money Matters -
In FY94, the General Assistance Program (formerly the Multi-Media Assistance Program) had a total Congressional appropriation of $8.5 million. These funds were awarded through 127 new and continuation grants to 115 tribes and 12 intertribal consortia. In total, 354 tribes received assistance through grants awarded in FY94 and 10 other tribes continued capacity building with funds awarded in previous fiscal years.

Since its inception in FY90, the Multi-Media/General Assistance Program has grown steadily. In FY90, two pilot projects were initiated with $151,00; this grew to 29 grants in FY91 ($1.7 million), to 60 grants in FY92 ($5.2 million), and to 100 grants ($7.5 million) in FY93.

The General Assistance Program provides funding assistance to federally recognized tribal governments and tribal consortia for the purpose of planning, developing and establishing the capacity to implement environmental management programs. The program will continue to be offered in FY95. Those currently receiving program assistance and other tribes interested in the Program should contact their Regional Indian Coordinators.

Thanks, OFA! - Responsibility for managing the Agency's Indian program will shortly rest with EPA's new American Indian Environmental Office. The staff of the *Native American Network*--and all of OSWER-- extends its heartfelt appreciation to all in the Office of Federal Activities for the years of unwavering dedication to the Indian program, despite the criticisms and obstacles that it often faced. To Dick Sanderson, Marshall Cain, Katie Biggs, Martin Topper, Clara Nickles and the many others who have been involved over the years: you made believers and advocates out of all of us. We thank you.

FY93 Report on *"EPA Environmental Activities on Indian Reservations"* - EPA has compiled information regarding its technical and financial assistance to Indian tribes for Fiscal Year 1993. Copies of the report, EPA 300-R-94-004, have been mailed to all tribes and other federal agencies. If you have not received one and would like to have a copy, contact Clara Mickles at 202-260-4221.

Congress Completes Action

On Legislation to Clean Up Open Dumps on Indian and Alaska Native Lands

In the final days of the 103rd Congress, the House and Senate completed action on S. 720, the Indian Lands Open Dump Cleanup Act of 1994. This culminates years of efforts to enact legislation dealing with the general problem of open dumps in Indian country.

Earlier this year, the Senate passed S. 720, which had been introduced by Senators McCain, Inouye, and Reid in April 1993. On October 3, the House Natural Resources Committee approved an amendment in the nature of a substitute bill to the Senate-passed bill, and on October 5, the full House passed this substitute bill. The Senate concurred in the amendment of the House to S. 720 on October 8, clearing the measure for the President. [As of publication, the President had not signed the bill into law, although he is expected to do so.]

Responsibility for implementing the Act rests with the Indian Health Service (IHS), which must inventory all open dump sites on a reservation-by-reservation basis within 12 months. The inventory should result in a 10-year plan to prioritize the dumps for closure and post-closure maintenance, or for upgrading to federal standards. The Act does not apply to small family dumps of one acre or less, industrial waste sites, or commercial facilities.

EPA must concur on IHS's assessment and cost estimates for closure and post-closure maintenance. Other federal agencies will be involved through cooperative agreements authorized by the IHS Director for cost-sharing, closure and post-closure activities, and financial and technical assistance.

The statute also authorizes a demonstration program involving at least three tribes or Alaskan native entities. To qualify, a tribe or Alaskan native entity must show that it:

- Has one or more existing open dumps on its lands;
- Has a comprehensive solid waste management plan; and
- Has developed a closure and post-closure maintenance plan for each dump.

For more information, contact your Area IHS office. ■

COMMENTARY

Alaskan Court Imposes "Green" Sentence

Pursuant to my having been found guilty of verbal assault against a prominent Bethel lady, Magistrate Craig McMahon handed down a sentence which included (at my request) assignment to complete 120 hours of community service. It was my remarkably good fortune to be placed, by Ms. Patricia Waters, administrator of the Community Service Program for the Bethel Police Department, with the Bethel Solid Waste Recycling Program, the director of which is Brian Glasheen. Having fulfilled the community service portion of my sentence, I am disposed to state the following:

(a) The experience, wisely provided by Magistrate McMahon, of providing a humble but worthwhile service to our community, has enhanced my own self image, and perhaps even, to some modest extent, society's image of me. I am grateful for that.

(b) Both Mr. Brian Glasheen, the current recycling project director and Allen Auxier, the founder and first operator of that program, represent the only system by which a viable hope may be maintained for sustaining life, as we now know it, on this planet. What a few conscientious persons practice voluntarily out of a sense of responsibility to our environment and to their fellow beings must eventually become as essential and involuntary a part of life as eating our meals. That is not the ravings of a visionary, but a hard-nose conclusion, based on extrapolations from an abundance of increasingly sobering, incontrovertible evidence.

Not only is Brian Glasheen a harbinger of hope for our future, but he is also an effective, congenial supervisor of, and excellent example for, court-assigned criminals like myself. It is hoped that recognition of his singular value and contribution-potential will be incrementally forthcoming from the non-criminal segment of society.

Name Withheld, Bethel

[The preceding articles appeared in the July 28, 1994, issue of the "Tundra Drums" and are reprinted with the permission of the editor.] ■

Recycling Project Searches for Gold

There's a gold mine in trash. In pure food grade aluminum cans alone, over 700 pounds a day are coming into Bethel. Estimates of trash dumped at the Bethel Landfill range from 28.5 tons a week to 20 tons a day. No documented waste analysis has been done but the fact remains that fully 40 percent of this is sellable under current market standards.

After some few years of volunteer commitment and the growth in cooperation of 20% of the population, Bethel Recycling Project (BRP) realizes the sale of 55 pounds of aluminum daily on average. As the figures illustrate BRP is still in its infancy.

As some have pointed out, the Bethel Landfill is in its boom days with all that free dirt provided by the lagoon project to cover these daily tons of trash. Does anyone remember the emergency expense of thousands of dollars of cover sand needed at the landfill to prevent receiving fines from the Alaska Department of Conservation just prior to the digging of the new lagoon?

Why bury resources? Why not plan for the future to utilize these materials and create jobs? Those thousands of dollars could be better spent covering some of the basic costs of doing the business of recycling. As with mining, there are machinery and manpower needs that demand a capital outlay before a single ounce of gold can be extracted. BRP has made the first hurdle by purchasing a small compactor for aluminum cans. An industrial size compactor for corrugated cardboard would be the next logical step. We have costly trucks and dumpsters for transport and collection of waste: an equal commitment needs to be made in the area of salvage and recovery.

Long range goals of the Bethel Recycling Project would encompass reuse and recovery of all the materials currently sought for salvage plus additional substances such as glycol, antifreeze and used motor oil. Heat recovery is an underutilized option at the present time. Pollution prevention is another beneficial outcome of a comprehensive recycling operation.

Now let us address the issue of manpower. Does anyone argue that costly incarceration of able-bodied men is non-productive? Does anyone argue that performing community service is a waste of time? By most people's standards employing community service workers in the business of recycling accomplishes two goals: the recovery of materials that would otherwise be wasted; and the productive utilization of a workforce that is expensive to maintain in overcrowded idleness.

This raises the issue that is perhaps the one most crucial to our society: education. We have been taught to choose disposable diapers, towels, and packaging. We have been taught that it costs too much to repair: just buy new. In a world that is reaching depletion of many of its extractive resources and is over-harvesting many of its otherwise renewable resources, we need to reclaim the wisdom of our elders: if it was important enough to harvest, dig up or denude the Earth for in the first place, it should be important enough to reuse, reclaim or recycle in the second.

Bethel Recycling Project serves to provide education to the community both by word and deed. The yellow recycling barrels remind beverage drinkers that their containers have an important function yet to perform. Anyone who recycles feels rewarded that they are contributing to a better world, a world where materials are valued. Community service workers salvage their self-respect and self-worth along with the materials they process and reclaim. Public service announcements encourage friends and neighbors to participate and many groups and individuals realize funds from their collection of properly prepared recyclables. Positive reinforcement is a powerful learning incentive.

Since its inception Bethel Recycling Project has depended on the support, cooperation and active involvement of all Bethel's residents including the changing roster of City Council members, staff and operations. It is so today. Without the continued sponsorship by the city, recycling in Bethel will remain but a token of compliance with waste reduction efforts.

Bethel Recycling Project is applying for non-profit status with the state and hopes to achieve continued steady growth in its capacity to recycle. We thank this City Council for maintaining the status quo of last year's contract as we go through this process. Between now and the renegotiation of next year's contracts, we encourage everyone to engage in planning discussions in order to fully realize the potential of this communities' resources, in garbage. Perhaps a documented waste analysis would be a logical first step: know what is generated before you design the mechanisms whereby you recover it. Perhaps a comprehensive placement of recycling-option containers at each disposal location would short circuit wasteful mixing of recoverable with non-recoverable or hazardous materials. Perhaps adoption of waste reduction and recycling practices at each business site will double the number of people who automatically and habitually recycle.

These and other considerations need time to evolve and develop. In the meantime, Bethel Recycling Project remains dependent on your nurturing and generous support. We thank you one and all.

(Contact: Amelie Redman, Association of Village Council Presidents, Bethel, AK 907-543-3521; Amelie is an EPA/VISTA volunteer. ■

Native American Network is published by the U.S. Environmental Protection Agency, Office of Solid Waste.

Editor: Judi Kane (703-308-8644).

The views expressed in *Native American Network* are those of the authors, and do not necessarily reflect or represent EPA policy. The intent of *Native American Network* is to provide a diverse array of information for those interested in environmental issues in Indian country, and to provide a forum for information exchange among tribal governments, EPA, other federal agencies, and state and local governments.

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