



Air Toxics Reporting Webinar

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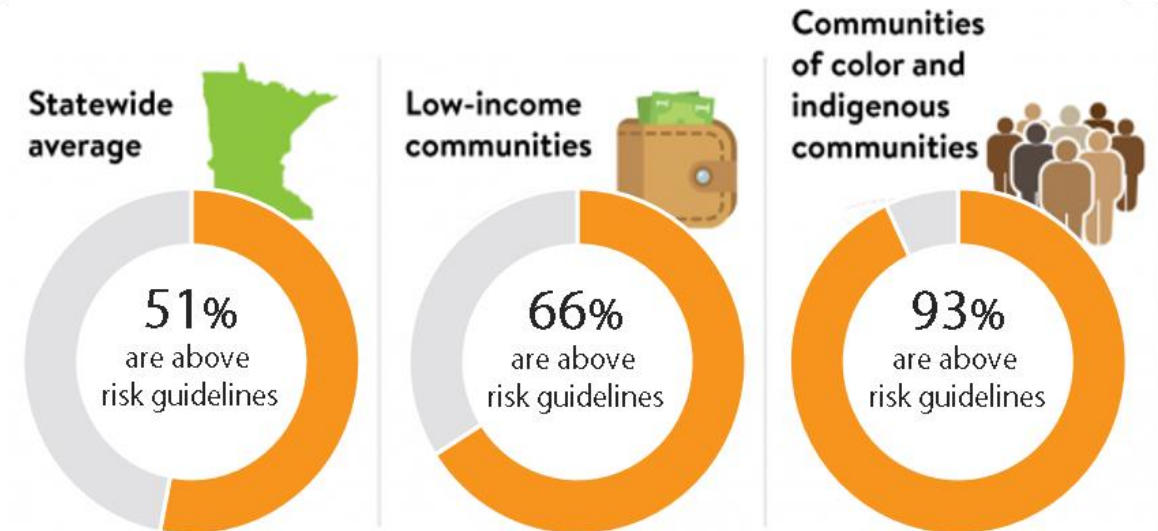
Our mission

Protect and improve the environment and enhance human health.

Governor's Equity Goal

“Our State must be a leader in ensuring that everyone has an opportunity to thrive. Disparities in Minnesota, including those based on race, geography, and economic status, keep our entire state from reaching its full potential. As long as inequities impact Minnesotans’ ability to be successful, we have work to do. Our state will recognize its full potential when all Minnesotans are provided the opportunity to lead healthy, fulfilled lives.”

Some communities are more likely to be near higher levels of air pollution



Agenda

Time	Topic
3:30-3:45	Describe Minnesota's current approach to air toxics regulations
3:45-4:15	Questions for stakeholders
4:15-4:30	What happens next?

Minnesota's Current Point Source Air Toxics Reporting Program

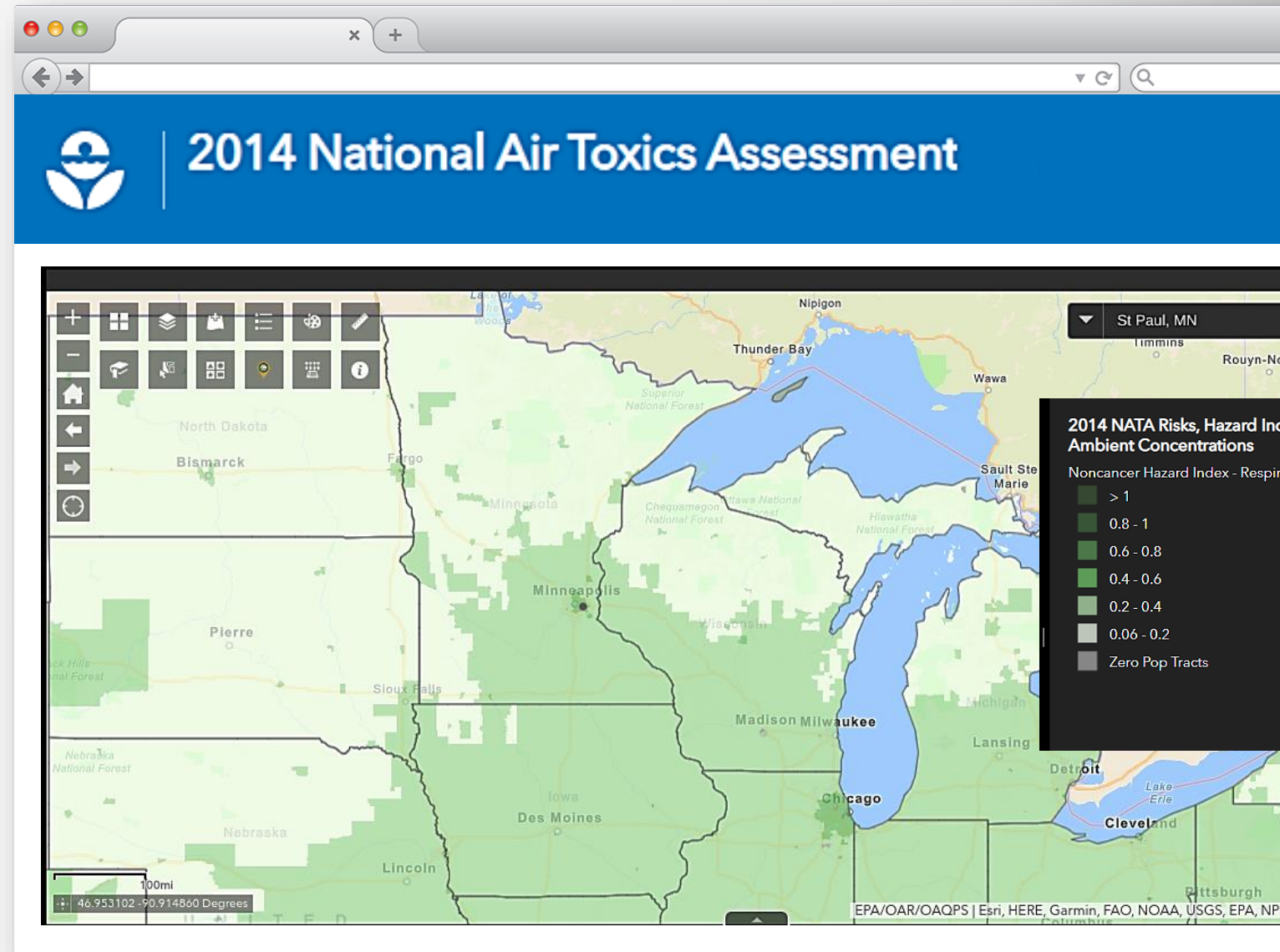
- National Emission Standard for HAPS (NESHAPs)
 - Standards of performance for Clean Air Act hazardous air pollutants
 - MPCA has delegation of NESHAPs
- MPCA maintains a triennial air toxics inventory
 - There are no general reporting requirements
 - Some permits require tracking of specifically identified air toxics
 - Data is sent to EPA for the National Emissions Inventory
- Air monitoring at handful of facilities
- Risk evaluation for some facilities
 - Environmental Assessments under EQB rules
 - Enforcement actions

Current Air Toxics Reporting Process

- Mainly Hazardous Air Pollutants (HAPs)
- Triennial—2020 is a reporting year
- All permitted facilities are asked to report
- PCA sends out previous reports, facilities review them for updating, returns to PCA
- PCA makes calculations for some sources/activities
- MPCA performs substantial quality assurance of this data

National Use of Emissions Inventory

- EPA requests that States report every 3 years
- EPA assesses risks with the National Air Toxics Assessment (NATA)
 - Identifies potential hotspots
 - Assesses if NESHAPs are protective
 - Environmental Justice Screening
- Forecast ozone for Air Quality Index



MN uses of Air Toxics Inventory

MNRISKS

- Equity analysis

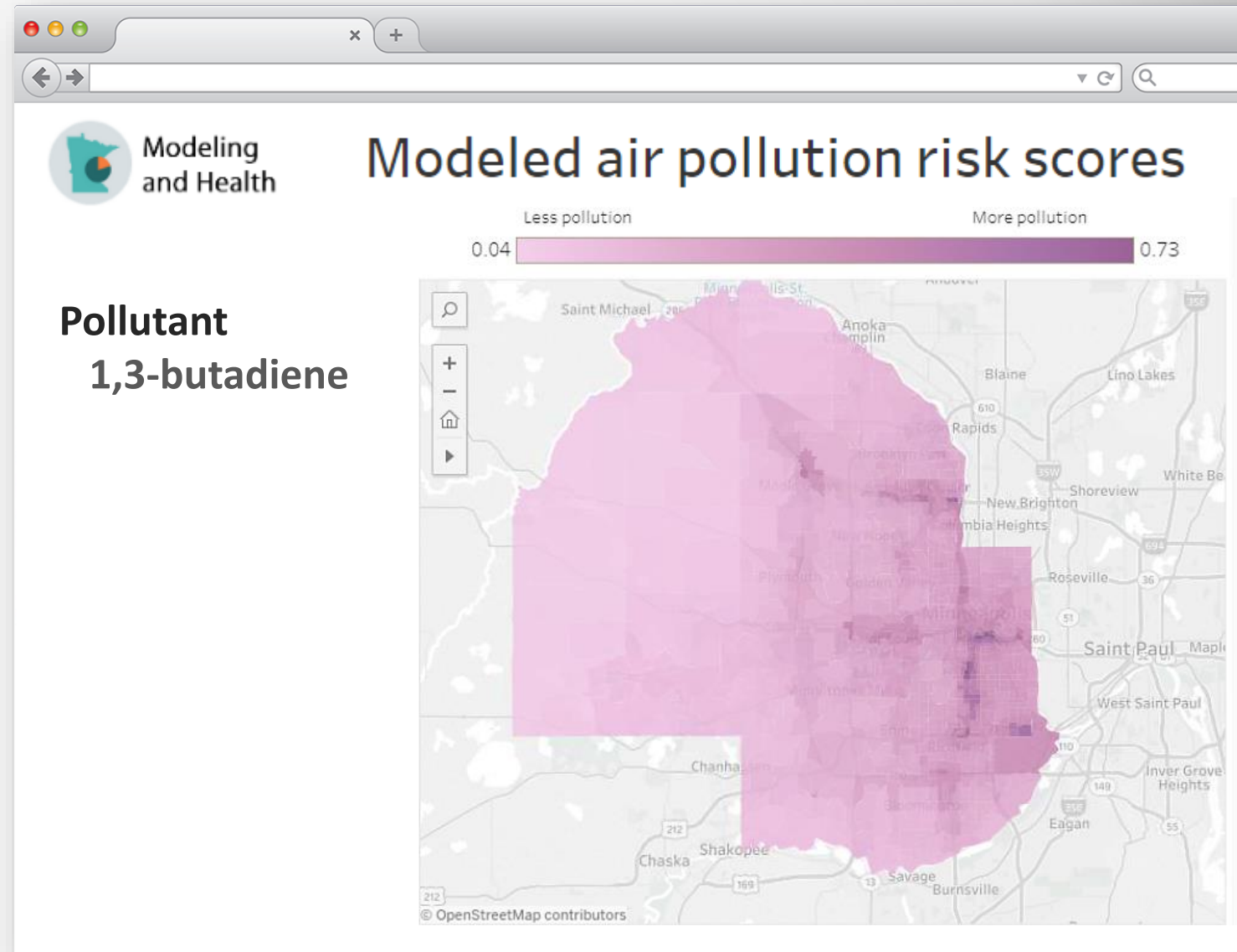
Monitor network planning

Grant scoring

Enforcement screening

Emerging concerns

Source contributions



Local uses of Air Toxics Inventory

Counties

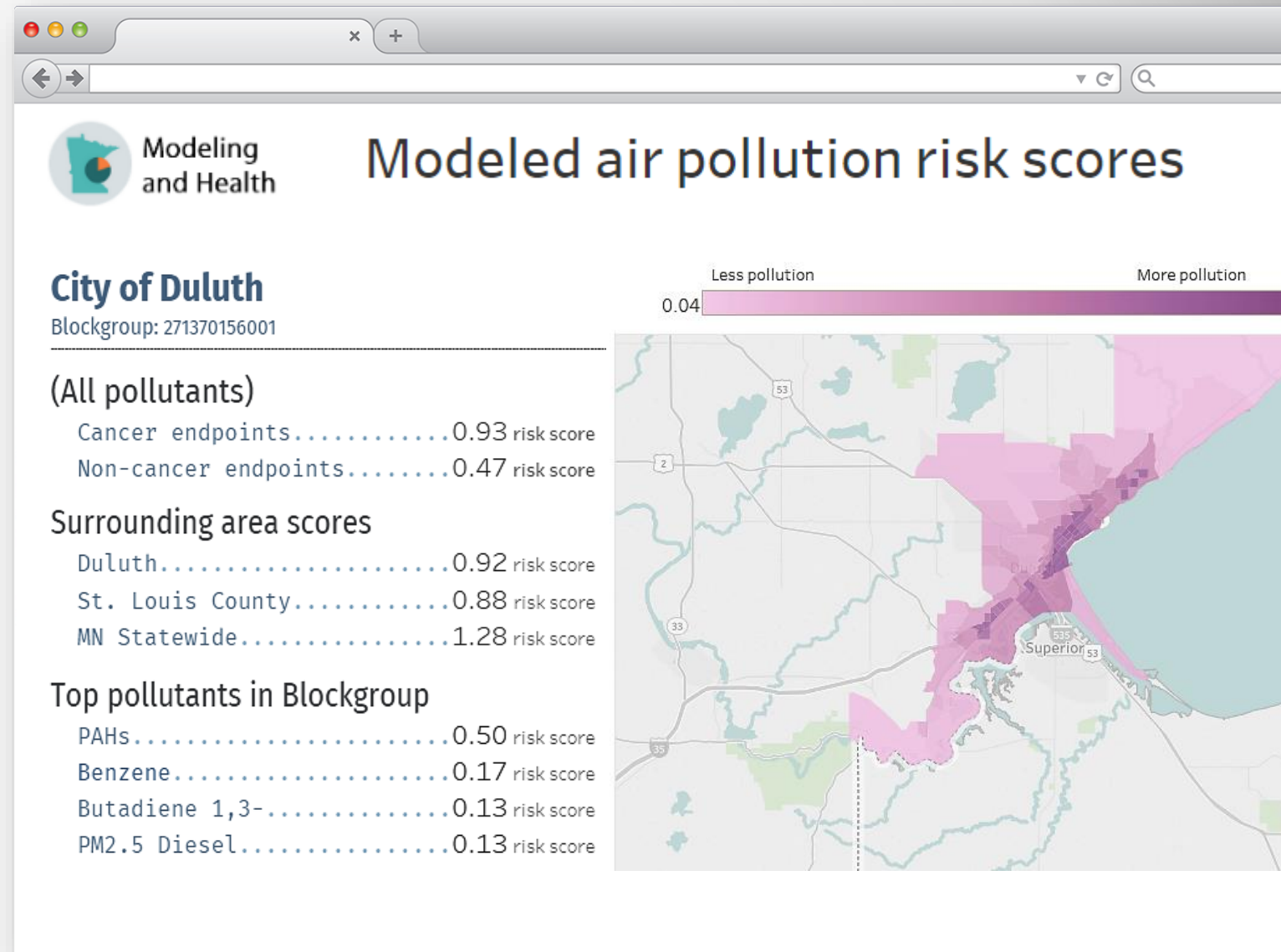
- Ramsey VOC reductions
- Hennepin Green Spaces

Cities

- MPLS air monitoring

Research & Outreach

- MnTAP



Gaps in Current Approach

- Voluntary reporting leads to incomplete information:
 - Not all permitted facilities report complete information or report at all
 - No requirement to correct data or confirm MPCA's recalculations
 - High quality data is needed to ensure accurate risk assessment results
- Toxics Inventory is limited to EPA Hazardous Air Pollutants (HAPs) plus a few other chemicals.
- Current triennial report schedule delays understanding emission changes.

Potential Reporting Rule

- Mandatory reporting for all permitted facilities
- Inventory process would look very much like current process
- Reporting could be every three years (current schedule) or every year (same as criteria pollutant emissions reporting)

Why consider this rule now?

- Ensure up-to-date and accurate air toxics information for evaluations. Addressing racial disparities in air pollution exposure requires timely and accurate data.
- Air monitors show criteria pollutants mostly decreasing, but for multiple Air Toxics levels are increasing or progress has stagnated (e.g. formaldehyde).
- Enforcement cases have uncovered large emitters that are not accurately reporting key Air Toxics such as TCE and lead.
- Legislative and public interest in cumulative impacts and moving towards rules/away from guidance.
- Would provide information base for any future air toxics risk assessment program, but would not create that rule or program right now.

Questions for Stakeholders

- Would you use the information we collect? How?
- Do you have concerns or questions about reporting burden? How does this reporting burden change when the inventory is not voluntary but mandatory?
- What would help simplify reporting?
- How should MPCA create the list of Air Toxics and maintain it over time? How to balance emerging pollutants of concern with a fixed list of air toxics in a rule? What should be the process for adding a pollutant to the list?
- What other state's toxics inventory and/or control programs should the MPCA look at?

Next Steps

- Please send any additional thoughts to Maggie.wenger@state.mn.us by August 7th, 2020.
- You will have multiple opportunities for input if and when this moves forward.
- How would you like to participate in a future rulemaking?
- Who else should we talk to?

Thank you again!

Please send any comments by August 7th, 2020

Maggie Wenger

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