

Addendum to Statement of Need and Reasonableness, October 2026

Introduction

The MPCA has confirmed an error in the agency's Statement of Need and Reasonableness (SONAR). This error does not impact the overall need for and reasonableness of the rule, nor does it affect the proposed rule itself. It affects one visual representation of the estimated impacts from facilities' emissions found on page 6 of the SONAR, as well as four related written descriptions that reference Figure 2.

This addendum is organized into two sections. Section 1 provides an overview, including a description of the error. Section 2 provides detailed revisions to the agency's SONAR figure and description of the figure.

Section 1: Overview

The MPCA made an error and used an incorrect ArcGIS shapefile when generating a map for the SONAR, Figure 2. Shapefiles contain location and attribute information that is used to create a representation of geographic data. The title for Figure 2 in the SONAR read: *2017 MNRISKS modeling shows seven metropolitan counties emissions data from voluntarily reported air toxics and environmental justice areas of concern.*

The shapefile used to create Figure 2 in the SONAR inaccurately represented emissions data from reported air toxics facilities due to an error within the ArcGIS shapefile. The incorrect shapefile used updated emissions data obtained in 2022 for specific facilities but contained incorrectly calculated risk values. To further correct Figure 2, the MPCA decided to use an updated ArcGIS shapefile showing impacts from emissions reported by facilities and other sources (e.g., traffic, residential and commercial heating, and other sources). Figure 2 is within the SONAR section describing the general need related to health risks from air toxics. The corrected Figure 2 provides a more accurate depiction of the health risks from air toxics in general. The estimated impacts from emissions reported by facilities are less than what was visually presented in the original SONAR map.

In addition to the changes required due to the incorrect ArcGIS shapefile, there were typographical errors where Figure 2 was the intended figure for reference, but the typographical errors listed 'Figure 1' instead. This occurred on pages 5, 31, 159 and 169 of the SONAR. It is reasonable to correct typographical errors because doing so provides clarity and prevents confusion for all interested persons. The changes also correct typographical errors where the SONAR referred to the map as Figure 1.

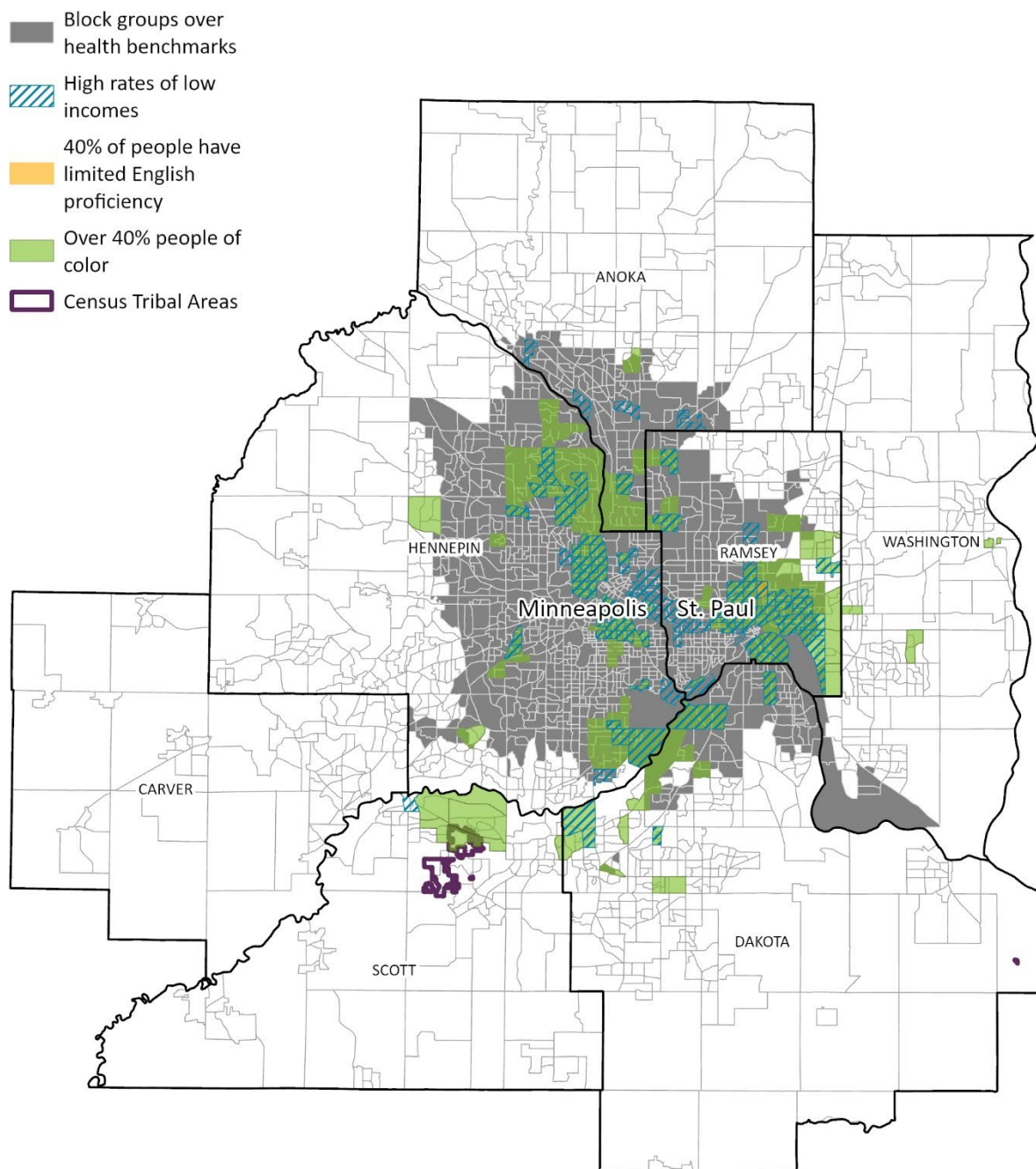
Section 2: Corrections to the SONAR

This section of the addendum identifies locations in the SONAR where the ArcGIS shapefile error impacts the map used in Figure 2 as well as descriptions of the Figure 2 map. At each location, the original, incorrect descriptions are struck through (example of ~~strike through text~~) and the corrected descriptions are bold and underlined (example of **bold and underlined text**).

Figure 2 of the SONAR (found on page 6).

The following shows the corrected map for Figure 2 and the corrected figure title.

"Figure 2. 2017 MNRISKS modeling shows seven metropolitan counties emissions data from voluntarily reported air toxics **and estimated air toxics from all other sources**, and environmental justice areas of concern."



Descriptions of and references to the map.

The following pages of the SONAR reference or describe the map and require corrections.

1. In the Statement of general need, Health risks from air toxics section (references located on page 5).
 - a. Air toxics are those pollutants that are known or suspected to cause cancer or other serious health effects, or adverse environmental and ecological effects. The MPCA has a tool called MNRISKS that takes emissions data reported by facilities, and models risks associated with those emissions and emissions from other sources. The most current risk analysis using MNRISKS is based on voluntarily reported air toxics emissions from facilities from 2017. This risk analysis for the seven metropolitan counties is depicted in Figure ~~21~~.
 - b. Based on this analysis as depicted in Figure ~~21~~, people living in ~~59.3%~~ ~~77.7%~~ of block groups (subsets of a census tract) in the seven metropolitan counties are exposed to air toxics pollution that is above health benchmarks. A health benchmark is the amount of air pollution considered unlikely to result in adverse health effects over a given period of time. An estimated ~~50.1%~~ ~~25%~~ of these over-benchmark block groups are located in areas of concern for environmental justice (indicated by orange, green, striped blue, or outlined purple areas in Figure ~~21~~). To date, air toxics reporting has been voluntary for facilities in Minnesota. Since the emissions reporting was voluntary, the true extent of impacts may be greater than what is shown on the map. The proposed rules are needed to help reduce air toxics emissions and address air toxics emissions exceeding health benchmarks in these block groups.
2. In the General reasonableness section (references located on page 31).
 - In the seven metropolitan counties, MNRISKS shows that ~~59.3%~~ ~~77.7%~~ of block groups (a subset of census tracts) are above health benchmarks, and an estimated ~~50.1%~~ ~~25%~~ (of the ~~59.3%~~ ~~77.7%~~) are in areas of concern for environmental justice (see Figure ~~21~~). The MPCA prioritizes reducing the disproportionate impacts from air pollution as one of its long-term goals. The MPCA's 2024-2028 Strategic Plan contains specific goals and strategies to identify and address where residents are disproportionately impacted by exposures to known pollutants. In addition to aligning with the MPCA's Strategic Plan, these proposed rules are reasonable as they help ensure that air emissions from facilities do not pose a risk to residents and help to set acceptable risk levels that facilities must be at or below.
3. In the Regulatory analysis section (references found on page 159).
 - Data from MNRISKS, presented in Figure ~~21~~ (in the Statement of general need section), indicate that ~~59.3%~~ ~~77.7%~~ of census block groups in the seven metropolitan counties exceed one or more health benchmarks for air toxics pollution from permitted facilities.
4. In the Costs of non-adoption section (references found on page 169).
 - Data from MNRISKS56, presented in Figure ~~21~~ (in the Statement for general need section), indicate that ~~59.3%~~ ~~77.7%~~ of census block groups in the seven metropolitan counties exceed one or more health benchmarks for air toxics pollution from all emissions reported by air toxics facilities.

Summary

The shapefile error detailed by this addendum does not affect the overall need for or reasonableness of the proposed rule. It affects one visual representation of the estimated impacts from facilities' emissions found on page 6 of the SONAR, as well as four related written descriptions that reference Figure 2.

This addendum will be filed into the record as Exhibit D-6, posted on the Court of Administrative Hearings eComments site and also posted on the MPCA's Air Toxics Regulations rulemaking website.