

Environmental Justice and Urban Air Quality Joint Priority

Excerpt from

MPCA/EPA Environmental Performance Partnership Agreement (PPA)

October 1, 2012 – September 30, 2016 (FFY 2013-2016)

Full PPA: <http://www.pca.state.mn.us/oxpg3d3>

Minnesota Context:

The Minnesota Pollution Control Agency's (MPCA) analysis of air quality information, including air monitoring data, air emissions data, air modeling data and risk modeling data, show two significant findings. The first finding is that a significant portion of Minnesota's air pollution comes from on-road mobile sources, off-road mobile sources and small stationary sources. The second finding is that locations in Minnesota with higher population densities, including Rochester and the core cities of Minneapolis and St. Paul, have higher levels of air pollution and experience higher resulting health risks from air pollution.

Within the densely populated urban areas of Minneapolis and St. Paul are communities of color, including Native American communities, and communities with lower economic status. Minnesota Department of Health data shows these communities have higher rates of adverse health outcomes with potential air pollution exposure components, such as asthma prevalence, asthma hospitalizations and cardiovascular hospitalizations. The Minnesota Department of Health reports cancer rates at the county level and has not analyzed cancer rates for the core cities of Minneapolis, St. Paul or Rochester.

The MPCA has recently experienced significant community opposition during permitting decisions and environmental review decisions. In many of these cases, the emissions from the point source seeking the permit were small and well controlled. In addition, the MPCA's review found that the emissions would not likely create additional health risks, either individually or on a cumulative basis, and that mobile sources and small stationary sources were the major sources of air pollution in the area. The community comments for these projects centered on community characteristics such as asthma rates, cancer rates and environment justice concerns. A common characteristic of all of these projects is the lack of trust between the community and the MPCA regarding the major sources of air pollution, the potential health risks from point sources and the connection between point source air pollution and health disparities.

To begin addressing the fair treatment pillar of environmental justice, the MPCA applied for a competitive grant under the Community Scale Air Toxics Grant process. The grant sought funding to develop new monitoring techniques for air toxics of concern in South Minneapolis, an area with environmental justice concerns, and engage the community in the deployment of the monitors and evaluating the results of the monitoring. This grant is not part of Minnesota's PPG. However, the MPCA recognizes this important environmental justice work in the context of the state and federal relationship and seeks to acknowledge the environmental commitments embodied in the PPA with the specific commitments contained in the Community Scale Air Toxics Grant.

Additionally, in a fall 2012 environmental review for a permit application, the MPCA identified a potential modeled exceedance of the 2006 24-hour PM2.5 National Ambient Air Quality Standard (NAAQS) in North Minneapolis. The potential modeled violation was not caused by the permit under review and the MPCA committed to deploy a new PM2.5 monitor near the potential modeled exceedance, work with nearby permitted sources to improve PM2.5 controls in the area and maintain engagement with the community to keep them informed of new data and information. The initial discussions with the community indicates that the commitment in North Minneapolis will include broader discussions of the nature of air pollution in the area, significant sources of air pollution for the area and potential reduction options available.

This joint priority supports EPA's Environmental Justice Plan 2014, specifically under Supporting Community-Based Action Programs section 1 (advance environmental justice principles by building strong state partnerships with the National Environmental Performance Partnership System (NEPPS)) and section 3.4 (build on and leverage Agency efforts to promote greater coordination in the use of programs and tools that support community empowerment). The joint priority also supports Section 4 Tools Development Areas, Strategy 5 which is intended to build and strengthen technical capacity of community-based organizations and community EJ and health leaders to address environmental health disparities and environmental sustainability issues by building community capacity to address asthma disparities and increase citizen participation in science and decisions.

Recognizing that environmental justice and urban air quality are important to both agencies, these activities will offer the opportunity to address these issues as they arise. Acknowledging that a variety of statewide issues may warrant support during the state's air quality planning, permitting and enforcement efforts, USEPA is prepared to support the state when they occur. For example, air toxics and asthma community concerns may need to be explained to the community, and support and assistance given to MPCA. USEPA will participate in planning meetings and outreach efforts as well as attend meetings to explain risk and public health concepts as well as share the results of studies.

On an annual basis, MPCA and EPA Region 5 program leadership will jointly identify the specific programs to involve in the community engagement efforts in South and North Minneapolis to provide a coordinated and effective deployment of each agency's air quality experts. Depending on the needs of the community and the grant progression, these experts may be air monitoring staff, air toxics staff, risk assessment staff, or risk communication staff.

Joint Priority Elements:

The MPCA and EPA Region 5 seek to work jointly in the following areas over the duration of this PPA and the Community Scale Air Toxics Grant.

- 1) The MPCA will meet all grant commitments as described in the Community Scale Air Toxics grant for the development of air monitoring techniques, the deployment of additional monitors and community engagement.
- 2) The MPCA will engage communities in areas where there are environmental justice concerns in South Minneapolis and Northern Minneapolis, to address concerns about air

pollution, health risks, and air pollution sources and seek to build better trust and communication between community members and the MPCA.

- 3) The MPCA will engage other communities in areas where there are environmental justice concerns related to air pollution in other parts of Minnesota as resources allow.
- 4) EPA Region 5 Air Monitoring Program, Air Toxics Program, and Environmental Justice Program will participate in the community engagement efforts of the MPCA in North and South Minneapolis to build and strengthen technical capacity of community-based organizations and community environmental justice and health leaders to address environmental health disparities and environmental sustainability issues.” (Plan EJ 2014, Science Tool Development Implementation Strategy 5)
- 5) On an annual basis, MPCA and EPA Region 5 program leadership will jointly identify the specific programs to involve in the community engagement efforts in South and North Minneapolis, or other locations in Minnesota, to provide a coordinated and effective deployment of each agency's air quality experts. Depending on the needs of the community and the grant progression, these experts may be air monitoring staff, air toxics staff, risk assessment staff, or risk communication staff.
- 6) In addition to building and strengthening technical capacity of communities, the MPCA and EPA Region 5 agree to work collaboratively to build trust between the communities of North and South Minneapolis, or other locations in Minnesota, and the environmental agencies to improve the understanding of air pollution sources and risks as well as identify common ground for emission reduction opportunities.
- 7) EPA Region 5 Asthma Program will coordinate with relevant stakeholders (including the Minnesota Department of Health, American Lung Association of the Upper Midwest, and the Minnesota Asthma Coalition) to provide community outreach, education, and resources about comprehensive asthma management and improve their understanding of asthma associated with indoor and outdoor air quality and other common triggers.

Additional information:

For more information on the Air Toxic Joint Priority, contact:

At MPCA, Frank Kohlasch at 651-757-2500 or frank.kohlasch@state.mn.us;

At EPA Region 5, Carlton Nash (312) 692-2543 or nash.carlton@epa.gov