

US EPA ARCHIVE DOCUMENT



# State Innovation Grant Program: Missouri

## St. Louis Comprehensive Multi-pollutant Management of Air Quality (2008 Competition)

### The State Innovation Grant Program

In 2002 EPA introduced the State Innovation Grant Program to support efforts led by state environmental agencies to test innovative approaches for achieving better environmental results and improved efficiency in permitting programs. Between 2002 and 2007, the State Innovation Grant program competition awarded over six million dollars to support 38 state projects that test permitting innovation for a variety of regulated entities including several small business sectors. A summary of the awards by year appears in the table below.

State Innovation Grant Program Statistics, 2002-2007			
Competition Year	Proposals Submitted	Proposals Selected	Total Program Funding (\$)
2002/2003	29	6	\$618,000
2004	33	9	\$1.425 Million
2005	26	7	\$1.479 Million
2006	25	6	\$1.243 Million
2007	17	7	\$1.611 Million
2008	12	3	\$0.825 Million
<b>Cumulative Total</b>	142	38	\$7.201 Million

"Innovation in Permitting" has been the theme of the State Innovation Grant competition since its inception. In the last three competition cycles states received awards for projects in the following three categories:

- **The Environmental Results Program (ERP)** is an innovative approach to improving environmental performance based on a system of the interlocking tools of compliance assistance, self-certification (sometimes, where permissible, in lieu of permitting), and statistically-based measurement to gauge the performance of an entire business sector. The program utilizes a multimedia approach to encourage small sources to achieve environmental compliance and pollution prevention. (See: <http://www.epa.gov/permits/erp/>)
- **Environmental Management System (EMS)** is a system involving a continual cycle of planning, implementing, reviewing and improving the processes and actions that an organization undertakes to meet its business and environmental goals. EMSs provide organizations of all types with a structured system and approach for managing environmental and regulatory responsibilities to improve overall environmental performance and stewardship. (See: [www.epa.gov/ems/info/index.htm](http://www.epa.gov/ems/info/index.htm))
- **Performance Track** is a partnership that recognizes top environmental performance among participating US facilities of all types, sizes, and complexity, both public and private. (See: <http://www.epa.gov/performance-track/>)

NCEI has provided awards also for projects testing watershed-based permitting, and for permit process streamlining in past competitions. For more information on the history of the programs, including information on solicitations, state proposals, and project awards, please see the EPA State Innovation Grants website at <http://www.epa.gov/innovation/stategrants>

### Project Background:

In 2007, The U.S. EPA's Office of Air Quality Planning and Standards (OAQPS) initiated three pilot projects to address the Clean Air Act Advisory Committee's - Air Quality Management Subcommittee recommendations for a new approach to the process of managing air quality. The objective of the pilot program is to forward that mandate by integrating the analysis, planning and implementation of the current air quality improvement processes into a single multi-pollutant step, called an Air Quality Management Plans (AQMP). One of these pilot projects focuses on the bi-state area of St. Louis (Missouri and Illinois), with a goal of providing a real-world example of integrated approaches and comprehensive community planning.

The Clean Air Act (CAA) requires that state environmental agencies develop and maintain air pollution control plans, known as State Implementation Plans (SIPs), outlining their strategies to protect air quality under the CAA. The Missouri Department of Natural Resources (MDNR) along with the Illinois Environmental Protection Agency (IEPA) have completed dozens of State Implementation Plan (SIP) submittals since the Clean Air Act was first established, each involving a number of technical steps that require significant resources.

States typically develop separate SIPs for every pollutant of concern. This is particularly resource intensive since, for each SIP submittal, states are asked to develop updates to emissions data, new modeling runs, and specific control strategies scenarios. The use of a multi-pollutant planning approach for air quality management instead of the traditional pollutant-by-pollutant approach will help reduce the duplication of technical efforts, ensure that control strategies developed for each pollutant examine the effects on other pollutants, and allow for development of overall air quality priorities for the state and the community.

Funds from the EPA National Center for Environmental Innovation State Innovation Grant Program will be used to advance certain aspects of MDNR's AQMP development, including integrating urban air toxics management into the planning for the major criteria pollutants of ozone, particulate matter, and lead; more clearly defining air quality priorities for the St. Louis area; and continuing development of community involvement in the air quality management process. Overall, the states agencies and stakeholders within the St. Louis community hope this process will provide efficiencies, reduce spending, and improve air quality, while linking land-use, transportation, energy planning, and climate change into the new AQMP.



## Project Description

The overall goal of the St. Louis AQMP pilot project and the MDNR state innovation grant is to provide a new mechanism to accomplish air quality planning in the St. Louis metropolitan area and generate air quality improvements in a more efficient, timely, transparent, and cost-effective manner. MDNR, working with Illinois and in the entire St. Louis area, will share the challenges encountered in the process, solutions developed, and final project outcomes with other states and EPA so that they may learn from MDNR's experience. Other overall project goals include:

- Completion of all SIP submittals required for compliance with the National Ambient Air Quality Standards (NAAQS) in St. Louis, including ozone, fine particulates, and lead;
- Inclusion of air toxics exposure as a metric when considering alternative control requirements for applicable NAAQS;
- Greater community involvement in the decision-making process, including regulated entities and community environmental advocacy groups; and
- Consideration of additional air quality issues in the development of SIP submittals, such as smart growth and transportation planning; environmental justice; and climate change.

The long term success of this effort will be measured through a number of indicators including:

- Change in the SIP development and submittal process to incorporate lessons learned from the pilot AQMP approach that will provide efficiency of scale and effective use of State resources;
- Reduction in overall timelines for SIP development and submittal;
- Reduction in air toxics emissions and exposure; and
- Attainment of air quality goals for the criteria pollutants.

The St. Louis AQMP project is one of three national pilot projects designed to provide a better understanding of the benefits and issues associated with a multi-pollutant approach and communicate those findings to other states. MDNR will also continue work to improve air quality through increased public awareness. MDNR will continue to provide opportunities for public interaction for all stakeholders at each point in the SIP development and overall regulatory process. For example, MDNR will continue to provide information regarding air toxics exposure in the St. Louis area to its citizens and other stakeholders during the SIP development process.

## Connection to EPA's Goals

Missouri DNR's project directly supports EPA's Strategic Goal #1 to protect and improve air quality, as well as Strategic Goal #5, focused on improved compliance and environmental stewardship,

by promoting an innovative approach to enhanced pollution prevention. It also supports, EPA's Cross-Goal Strategy of promoting innovation and collaboration with states.

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