

The New RCRA State and Tribal Assistance (STAG) Funding Formula

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EPA STAG Funding Formula

- **EPA's RCRA STAG formula not updated in almost 20 years**
- **EPA solicited input from the states/territories/tribes and state organizations on potential formula changes in 2013**
- **Missouri input provided directly to EPA and through the Association of State and Territorial Solid Waste Management Officials (ASTSWMO)**
- **National STAG Funding in federal fiscal year (FFY) 1995 = \$98,899,700**
- **National STAG Funding in FFY2016 = \$99,397,000**

EPA STAG Funding Formula (cont.)

- **New STAG formula announced on March 26, 2015, effective in FFY 2016**
- **Premised on the following RCRA program areas:**
 - **Hazardous Waste Generators – 17% small quantity generator (SQG), 12% large quantity generator (LQG)**
 - **2020 Corrective Action Baseline Facilities – 34%**
 - **Permitted hazardous waste (HW) treatment, storage and treatment (TSD) facilities – 37%**

STAG Funding Formula Impacts

- **Seven EPA Regions (1, 3, 4, 5, 8, 9 and 10) see funding increases of 2 - 30% and three EPA Regions (2, 6 and 7) see funding decreases of 9 - 15%**
- **EPA Region 7 STAG funding reduced by 12% from FFY2015 (\$5,882,000) to FFY2020 (\$5,171,165)**
- **Missouri's STAG funding reduced by 30% from FFY2015 (\$2,823,948) to FFY2020 (\$1,966,594)**
- **Missouri's reduction of \$857,354 phased in over five years (\$171,471/year on average) and represents a potential loss of 8-10 full time hazardous waste funded staff positions once fully implemented**
- **Other states in EPA Region 7 would actually experience modest funding increases during this five year period**

STAG Funding Formula Concerns

- **Missouri's concerns conveyed to EPA Region 7 and headquarters through letters, meetings and teleconferences over the past 15 months**
- **Concerns not based on the new formula itself**
- **Concerns are based on “raw” RCRAInfo database numbers used without appropriate evaluation**
 - **Accuracy of the data**
 - **Actual work loads**
 - **Future considerations**

National STAG Funding Calculation Issues

- **17% SQG portion based on state population statistics**
- **12% LQG portion based on 2011 Biennial numbers**
 - **Proposed Pharmaceutical Rule Impacts (future) apparently considered**

National STAG Funding Calculation Issues (cont.)

34% - Corrective Action (CA) 2020 Baseline Facilities (3779)

- **RCRAInfo (8/24/15): One EPA region and 14 states had more facilities listed on the 2020 corrective action baseline than they had in their “subject to corrective action” universes**
- **Facilities deferred (212) to other programs (e.g., Superfund) included**
- **Facilities with corrective action completed or process terminated (1077) were included**

Corrective Action (CA) STAG Funding Issues of Further Significance in Missouri

- **CA work on non-2020 baseline facilities is not factored into the formula. Missouri is currently performing and/or planning CA work at facilities that are not on the 2020 baseline prior to the next potential baseline revision**
- **CA Work Sharing (see following graphic)**



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National STAG Funding Calculation Issues

- **37% - Permitted HW TSD Facilities**
 - **Analysis of category difficult due to apparent inaccuracies and inconsistent data entry**
 - **No recognition that certain facilities on the permitting baseline are not going to be permitted**
 - **Facilities deferred to other programs**
 - **No permit-related actions for 20-30 years**
 - **Withdrawn permit applications/clean closure**

Permit-related STAG Funding Issues of Further Significance in Missouri

- **Permit related combustion-related activities and workloads have diminished, but not disappeared (e.g. combustion risk assessment work, potential new combustion units at permitted facilities). This comment provided to EPA when the STAG formula ideas previously circulated for comment.**
- **No consideration of sustainable materials management and recycling component (i.e., many permits address this component and was a comment to EPA when the formula ideas were previously circulated for comment.)**
- **Permit issuance/reissuance and modification workloads**

How Are We Dealing the Funding Situation?

- **Working with EPA Region 7 and headquarters on RCRAInfo data quality assessment**
- **Discussing with EPA Region 7 flexibility in their Iowa funding, since they operate the Iowa RCRA program**
- **Assessing consolidation of certain staff functions and ability to fill vacancies as they occur**
- **Reducing certain EPA work commitments**
- **Maximizing cost-recoverable activities as allowed by the state's hazardous waste law and regulations**
- **Battery fee legislation**



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Questions?

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