

# Air Stakeholder Fee Meeting

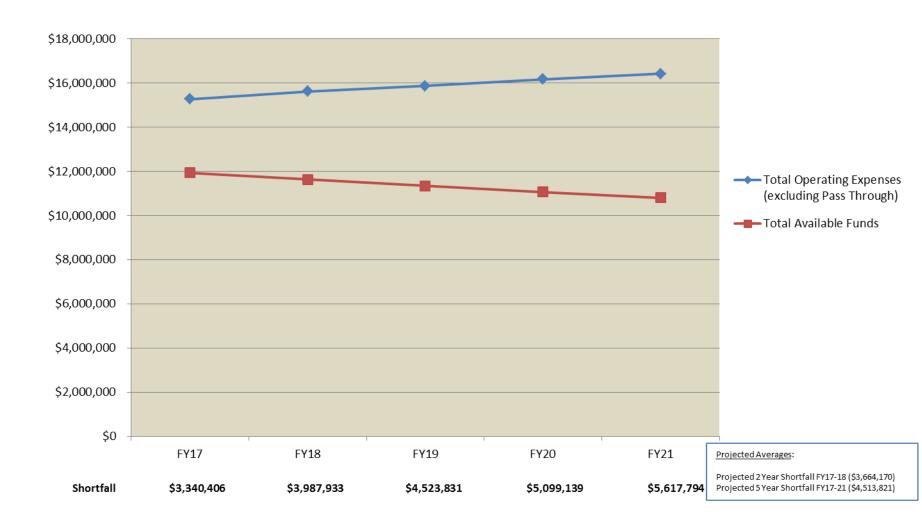
May 19, 2014



## Discussion Items

- Overview of shortfall 2 yr average
  - Provided 5 yr average
- Example of other state's fees
- Estimated cost accounting and workload analysis
  - Permitting and Asbestos
- Options for Discussion
- Fee Calculator

# Air Pollution Control Funding Projected Operating Costs (excludes Pass Through) compared to Available Funds 2 and 5 Year Average Shortfalls All Fund Sources





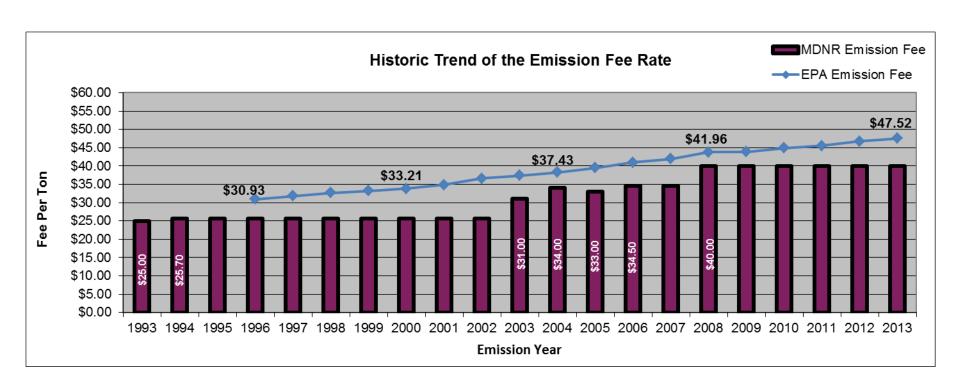
### **Projected Shortfall Averages**

**Projected 2 Year Shortfall FY17-18 (\$3,664,170)** 

**Projected 5 Year Shortfall FY17-21 (\$4,513,821)** 

\*Projections include the Air Emission Reduction Fund Shortfall (GVIP). That shortfall is not included in the fee calculator. 2 Year Shortfall (\$136,287) and 5 Year Shortfall (\$197,543).

### **Historical Emission Fee Rate**



#### RSMO Section 643.079

- Emission Fee is capped at \$40.00 per ton of each regulated air contaminant emitted.
- Tonnage is capped at the first 4,000 tons of each regulated air contaminant emitted and no more than 12,000 tons in any calendar year.



### **Examples of State Annual Emission Fees**

State	<b>Emission Fee</b>	Chargeable Emission Limits
Missouri	\$40 per ton	Single pollutant max of 4,000 tons/12,000 tons of all pollutants combined
Arkansas	\$23.42 per ton	Single pollutant max of 4,000 tons
Illinois	Varies	
Kansas	\$37 per ton	Single pollutant max of 4,000 tons
Iowa	\$56 per ton	Single pollutant max of 4,000 tons
Nebraska	\$65 per ton	Single pollutant max of 400/4,000 tons

# Title V Source Permit & Emission Fee Examples

Facility Type	Illinois	Arkansas	Missouri	lowa	Kansas	Nebraska
One Coal Boiler	\$54,112	\$374,720	\$480,020	\$896,000	\$592,200	\$1,040,000
Cement Kiln	\$25,712	\$140,988	\$240,020	\$336,000	\$222,200	\$390,000
Large VOC Source	\$5,912	\$11,710	\$4,020	\$5,600	\$3,900	\$6,500
Intermediate Facility	\$2,510	\$2,782	\$2,420			

#### **Assumptions:**

- -Same scenario used for each state (equalized tons of emissions)
- -Annualized over 5 years
- -Does not include Construction Permits or Modifications
- -Estimates only



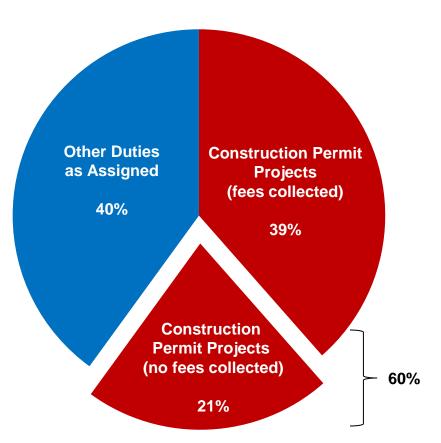
# Cost Accounting and Workload Analysis

#### **Construction Permits**

- Utilizing CY2013 Construction Permit hours and permit actions, Approximately 60% of Construction Permit staff time is spent on "Permit" related activities:
  - Approximately 39% of those activities are charged a fee.
  - The other 21% is permitting performed with no fee charged.
- The other 40% of Construction Permit staff time "Other" activities
- Permit fees would not cover 100% of the Construction "Permit" activities.
- Goal cover 60% of staff time with permit fees.



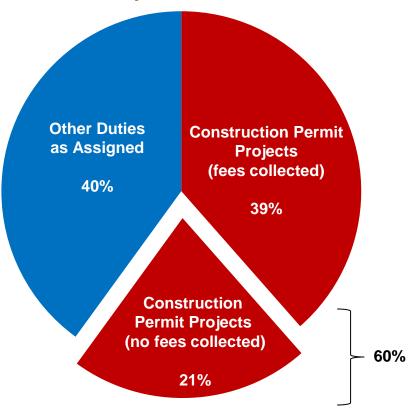
# **Construction Permit Unit Activity Breakdown**



#### 60% Construction Permit Projects

- Fees Collected 39%
  - ✓ Permit Amendments
  - ✓ Extensions
  - ✓ Section 5 & 6 Permits
  - ✓ Temporary Permits
  - ✓ Permit-by-Rule
  - ✓ Relocation/21-day
- No Fees Collected 21%
  - ✓ Guidance & Efficiency Improvements
  - ✓ Applicability Determinations
  - ✓ Relocation to Approved Site
  - ✓ Local Permit Review
  - ✓ Permit Corrections

# Construction Permit Unit Activity Breakdown



### 40% Other Engineering Duties

- √ Phone inquiries
- √ Correspondence
- Meetings with company representatives
- ✓ Assist & Coordinate with Enforcement/Rules/EIQ Staff
- ✓ Attend conferences, workshops, & training
- ✓ On-site facility visits
- Reading and reviewing technical correspondence and documentation
- ✓ Preparing papers
- ✓ Preparing presentations on air pollution control issues
- ✓ Etc.



*2 Year Average Construction Permit Cost	\$1,759,027
60% Construction Permit Activity	\$1,055,416
Average Construction Permit Fee Revenue	\$229,080
Goal Needed to Cover Activity	\$826,336

Goal - 60% of the Construction Permit Costs funded by Construction Permit fees.

Construction Permit Unit 12.50 FTE Modeling Unit 3.00 FTE Administration 1.82 FTE

\*5 Year Average Construction Permit Cost - \$1,840,179 (Goal \$875,027)



# Cost Accounting and Workload Analysis

### **Operating Permits**

- Utilizing CY2013 average number of permits by permit type.
   Approximately 80% of Operating Permit staff time is spent on Title V sources.
- Permit fees would not cover 100% of the Operating "Permit" activities.
- Goal cover 20% of staff time with permit fees.
- Emission fees in place to cover the cost of administering the overall program and intended to cover some of the permit activity.



*2 Year Average Operating Permit Cost	\$1,427,876
20% Operating Permit Activity	\$285,575
Average Operating Permit Revenue	<u>\$27,200</u>
Goal Needed to Cover Activity	\$258,375

Goal - 20% of the Operating Permit Costs funded by Operating Permit fees.

Approximately 80% of the Operating Permit projects are for Title V sources and should be funded by the Title V Emission Fee.

Operating Permit Unit 11.73 FTE Administration 1.43 FTE

\*5 Year Average Operating Permit Cost - \$1,493,751 (Goal \$271,550)



# Cost Accounting and Workload Analysis

### <u>Asbestos – No Workload Analysis</u>

- A workload analysis of asbestos costs was not necessary since these expenses are tracked in the state accounting system as strictly "Asbestos" activities.
- Goal Asbestos fees support 100% of asbestos activities.



*2 Year Average Asbestos Cost	\$643,327
Average Asbestos Fee Revenue	\$257,419
Goal Needed to Cover Activity	\$385,908

Goal - 100% of the Asbestos Costs funded by Asbestos fees.

<sup>\*5</sup> Year Average Asbestos Cost - \$659,237 (Goal \$401,819)



# **Options for Discussion**

- ✓ Construction Permit Fees
- ✓ Operating Permit Fees
- ✓ Emission Fee
- ✓ Asbestos Fees

### **Fee Calculator**

## Discussion

# Future Meetings - if needed

- > June 16, 2014
- Roaring River/Bennett Springs Conference Room
- > 10:00 a.m.

# **Questions?**

Celebrating 40 years of taking care of Missouri's natural resources. **40 years** 

Missouri Department of Natural Resources