



**MISSOURI**  
DEPARTMENT OF  
NATURAL RESOURCES

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# **Air Pollution Control Program Fee Stakeholder Meeting/Conference Call**

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May 26, 2015

1:30 p.m.

# Asbestos Fees

- Goal – Asbestos fees support 100% of asbestos activities
  - Approximate annual expenditure  
\$600,000 - \$625,000
- Suggested increases reflect goal

# Suggested Asbestos Fees - For Discussion

**DRAFT – subject to stakeholder discussion and approval**

Fee Type	Current Fee	Fee Adjustment For Discussion*
Asbestos Demolition Fee (allowed in RsMO 643.237/currently not collected)	\$100/Demolition Project	No fee adjustment / propose start collecting
Asbestos Certification Fee		
Worker Asbestos Certification	\$25 for Workers	\$40
Other Disciplines Asbestos Certification	\$75 for All Other Disciplines	\$100
Asbestos Recertification Fee		
Worker Asbestos Recertification	\$5 for All Workers	\$20
Other Disciplines Asbestos Recertification	\$5 for Other Disciplines	\$50
Asbestos Registration Fee	\$1,000/Registration	\$2,650
Asbestos Exam Fee	\$25/Exam	\$25
Asbestos Accreditation Fee	\$1,000 per Course/ \$3,000 cap	\$1,000 per Course/ \$3,000 cap
Asbestos Inspection Fee	\$100/\$300 Max	\$200/\$400
Asbestos Exemption Fee	\$250/Exemption	No fee adjustment
Asbestos Abatement Notification Fee	\$100/Notification	\$200

# Suggested Permit Fees - For Discussion

\*DRAFT – For Stakeholder Discussion and Approval

Fee Type	Current Fee	Fee Adjustment For Discussion*
Portable Source Filing/Review Fee	\$200/Application	<b>\$300</b>
Construction Permit Review Fee	\$50/Review Hour	<b>\$100</b>
Construction Permit Filing Fee (Deminimis & Minor)	\$100/Application	<b>\$250</b>
Construction Permit Filing Fee - Major Prevention of Significant Deterioration (PSD)	\$100/Application	<b>\$5,000</b>
Vapor Recovery Permit Filing Fee	\$100/Application	<b>No fee adjustment</b>
Operating Permit Filing Fee (Basic)	\$100/Application	<b>\$500</b>
Operating Permit Filing Fee (Intermediate & P70)	\$100/Application	<b>To be discussed</b>

# Operating Permits - Fees Intermediate and Part 70

- 5 Year Permit
- Current fee is \$100 filing fee per application
  - \$20 per year
- No hourly review fee
- Time spent on permit application ranges from 6 hours to 200 hours
  - No average
  - Majority is between these 2 extremes

# Part 70/Intermediate Operating Permit Fee Tiered approach

**\*For Discussion -Subject to Stakeholder approval**

## Filing Fee based on complexity of permit

1. Base fee based on # Emission Units
2. Additions to Base Fee
  - Major items that add to workload of writing permit (not all)
3. Total #1 and #2 for Fee Amount – not to exceed a set maximum

# Tiered approach

## Additions to Flat/Base Fee - Options

1. New Source Performance Standards (NSPS)
2. Maximum Achievable Control Technology (MACT) standards
3. National Emission Standards for Hazardous Air Pollutants (NESHAP)
4. Compliance Assurance Monitoring (CAM) Plans
5. Subject to Acid Rain
6. Confidentiality Request

# Part 70/Intermediate Filing Fee

- Filing Fee = Base Rate + Additions
- Minimum Fee = Applicable Base rate
- Maximum Fee = **\$6,000 (DRAFT)**
- Filing Fee Structure same - initial & renewals
- Overpayment/underpayment addressed prior to issuance of permit



# Part 70/Int Filing Fee

Base Fee – Calculate number of emission points

# of Emission Points	Base Fee
0 to 30	\$ 750
31 to 60	\$1,000
61 to 90	\$1,250
Over 91	\$1,500



## Part 70/Int Filing Fee Continued: Additions to Base Fee

<b>Additional Permit Item</b>	<b>Enter # (A)</b>	<b>Fee (B)</b>	<b>Total Additional Fee A x B (add to base fee)</b>
New Source Performance Standard (NSPS)	Enter # of standards applicable to installation	\$1,000	
Maximum Achievable Control Technology (MACT)	Enter # of standards applicable to installation	\$1,500	
National Emissions Standards for Hazardous Air Pollutants (NESHAP)	Enter # of standards applicable to installation	\$1,500	
Compliance Assurance Monitoring (CAM)	Enter # of plans per installation	\$1,000	
Confidentiality Request	Enter "1" if submitted/"0" if not	\$ 500	
Acid Rain	Enter "1" if submitted/"0" if not	\$ 500	
<b>Total Added to Base Fee</b>			<b>\$</b>



# Part 70/Int Filing Fee Example 1

**Base Fee** – Calculate number of emission points (from Emission Inventory Questionnaire, Operating Permit)

# of Emission Points	Base Fee
0 to 30	\$ 750
31 to 60	\$1,000
61 to 90	\$1,250
Over 91	\$1,500

**Example 1: Facility X has 6 emission points, 1 NSPS, 2 MACT, and a confidentiality request**

**Base fee = \$750**

# Part 70/Int Filing Fee Example 1 Continued: Additions to Base Fee

<b>Additional Permit Item</b>	<b>Enter # (A)</b>	<b>Fee (B)</b>	<b>Total Additional Fee A x B (add to base fee)</b>
New Source Performance Standard (NSPS)	1	\$1,000	\$1,000
Maximum Achievable Control Technology (MACT)	2	\$1,500	\$3,000
National Emissions Standards for Hazardous Air Pollutants (NESHAP)	0	\$1,500	\$0
Compliance Assurance Monitoring (CAM)	0	\$1,000	\$0
Confidentiality Request	1	\$500	\$500
Acid Rain	0	\$500	\$0
<b>Total Added to Base Fee</b>			<b>\$4,500</b>
<b>Base Fee (from step 1)</b>			<b>\$750</b>
<b>Total Filing Fee</b>			<b>\$5,250</b>

**Example 1: Facility X has 6 emission points, 1 NSPS, 2 MACT, and a confidentiality request**  
**Base fee = \$750**



# Part 70/Int Filing Fee

## Example 2

**Base Fee** – Calculate number of emission points (from Emission Inventory Questionnaire, Operating Permit)

# of Emission Points	Base Fee
0 to 30	\$ 750
31 to 60	\$1,000
61 to 90	\$1,250
Over 91	\$1,500

**Example 2: Facility Y has 200 emission points, 0 NSPS, 0 MACT, 0 CAM plans, is not subject to acid rain and did not submit a confidentiality request**

**Base fee = \$1,500**

## Part 70/Int Filing Fee Example 1 Continued: Additions to Base Fee

Additional Permit Item	Enter #	Fee	Total Additional Fee
	(A)	(B)	A x B (add to base fee)
New Source Performance Standard (NSPS)	0	\$1,000	\$0
Maximum Achievable Control Technology (MACT)	0	\$1,500	\$0
National Emissions Standards for Hazardous Air Pollutants (NESHAP)	0	\$1,500	\$0
Compliance Assurance Monitoring (CAM)	0	\$1,000	\$0
Confidentiality Request	0	\$500	\$0
Acid Rain	0	\$500	\$0
<b>Total Added to Base Fee</b>			\$0
<b>Base Fee (from step 1)</b>			\$1,500
<b>Total Filing Fee</b>			\$1,500

**Example 2: Facility Y has 200 emission points, 0 NSPS, 0 MACT, 0 CAM plans, is not subject to acid rain and did not submit a confidentiality request  
Base fee = \$1,500**

# Part 70/Intermediate Filing Fee

## Other considerations

- Major Modifications
  - No charge – many are wrapped into Part 70
- Minor modifications
  - No charge
- Off Permit changes
  - No Charge

# Timeline for Rulemaking - Asbestos

- May 28, 2015 : Present proposed asbestos fee structure to Missouri Air Conservation Commission (MACC)
- June 25, 2015: MACC approve department to start asbestos rulemaking.
- July 2015: File proposed rulemaking

# Timeline for Rulemaking

## Asbestos - Continued

- September 24, 2015 – Asbestos Rules Public hearing
- October 29, 2015 – MACC adoption of rules
- December 1, 2015 – File order of Rulemakings
- January **2017** - Rulemaking(s) effective.
  - Fee(s) take effect January 1, 2017

# Timeline for Rulemaking – **Permits**

## Tentative

- May/June: Finalize Fee Stakeholder Discussions
- June 2015: Present proposed fee structure to Missouri Air Conservation Commission (MACC)
- June/July 2015: MACC approve department to start rulemaking.
- July 2015: File proposed rulemaking

## Timeline for Rulemaking – **Permits** continued (Tentative)

- September 24, 2015 – Rule Public hearing(s)
- October 29, 2015 – MACC adoption of rules
- December 1, 2015 – File order of Rulemaking
- January **2017** - Rulemaking(s) effective.
  - Fee(s) take effect January 1, 2017

Division of Environmental Quality Director: Leanne Tippett Mosby

Date: May 26, 2015

Nothing in this document may be used to implement any enforcement action or levy any penalty unless promulgated by rule under chapter 536 or authorized by statute.