

# **Air Pollution Control Program Fee Stakeholder Meeting**

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April 30, 2015

# 2015 Fee Stakeholder Process

- Continue the discussion of fees that support the activities of the program:
  - Permit fees
  - Asbestos Fees
- Goal – submit revised fee structure to Missouri Air Conservation Commission  
May 28, 2015



# Asbestos Fees

- Goal – Asbestos fees support 100% of asbestos activities
- Suggested asbestos fee increases reflect goal

# Suggested Asbestos Fees - For Discussion

**\*DRAFT – For 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	\$50
Other Disciplines Asbestos Certification	\$75 for All Other Disciplines	\$100
Asbestos Recertification Fee		
Worker Asbestos Recertification	\$5 for All Workers	\$25
Other Disciplines Asbestos Recertification	\$5 for Other Disciplines	\$75
Asbestos Registration Fee	\$1,000/Registration	\$2,650
Asbestos Exam Fee	\$25/Exam	\$50
Asbestos Accreditation Fee	\$1,000 per Course/ \$3,000 cap	\$1,000 per Course/ No 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 Intermediate and Part 70

- Approximately 490 sources subject
- These sources require more work by all department staff due to EPA requirements.
  - Permit Review
  - Inspections
  - Reviewing Compliance reports
    - Annual and Semi-annual
  - EPA Reports
  - Emission Inventory
  - Stack Testing oversight

# 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

# Operating Permit Fees

## Intermediate and Part 70

### Options

- Flat Fee = Inequity?
- Hourly Rate – Not in current fee structure
- Charge by complexity of permit?
  - Discuss this option – tiered fee



# Operating Permit Fee

## Tiered approach

- Multiple ways to do tiered approach
  - Reviewed Minnesota fee structure
- Tried to simplify and account for most items that take additional work
- **Open for Discussion**

# Part 70/Intermediate Operating Permit Fee Tiered approach

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

Filing Fee based on complexity of permit

## Option:

1. Set a Base fee based on # Emission Units
2. Additions to Base Fee
  - Major items that add to workload of writing permit (not all)
3. Set a Maximum Amount

# Tiered approach

## Additions to 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

# Tiered approach

## Additions to Base Fee - Workload

### New Source Performance Standards (NSPS)

- Permit
  - Verify applicability
  - Verify compliance
  - Determine demonstration of compliance
  - Draft permit language related to standard
- Review & process compliance reports
- Stack Test oversight when applicable
- Compliance verified on inspection

# Tiered approach

## Additions to Base Fee - Workload

### MACT and NESHAP

- Same as NSPS
- Rules more complex and therefore take additional time than NSPS

# Tiered approach

## Additions to Base Fee - Workload

### CAM Plans

- Detailed review and analysis required
- Stack testing oversight when applicable

# Tiered approach

## Additions to Base Fee - Workload

### Acid Rain

- Review and analysis required every 5 years
- Separate permit – usually issued with Part 70

### Confidentiality Request

- Review and concurrence of requested information.
- Requires special handling of all permit documents to maintain confidentiality

## Option for Base Fee

\*For Discussion -Subject to Stakeholder approval

Emission Points	Approximate Number Permits**	Approximate Number That would pay Base Fee Only**	Base Fee Option 1*	Base Fee Option 2*
0-30	350	123	\$750	\$1,000
31-60	75	17	\$1,000	\$1,250
61-90	20	4	\$1,250	\$1,500
over 91	35	7	\$1,500	\$1,750

\*\* Approximate numbers for reference and discussion purposes





# Additions to Base Rate

\*For Discussion – Subject to Stakeholder Approval

	Column A	Column B	Column C
Name	Enter #	Amount	Add to Base Rate
NSPS (Enter # standards applicable to installation)		\$1,000	Column A *Column B
MACT/NESHAP (Enter # standards applicable to installation)		\$1,500	Column A *Column B
CAM (Enter # plans per installation)		\$1,000	Column A *Column B
Confidentiality Request (Enter 1 if submitted/ 0 if not)		\$500	Column A *Column B
Acid Rain (Enter 1 if applicable/0 if not)		\$500	Column A *Column B
<b>Total Added to Base Rate:</b>			<b>Total Column C</b>

# 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
- Examples of how to calculate fee in application instructions
- Overpayment/underpayment addressed prior to issuance of permit

# Part 70/Intermediate Filing Fee

## Other considerations

How to handle:

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

# Other

- Any questions/comments, suggestions...
- Next Fee Meeting – mid May?
  - Will schedule meetings or conference calls
  - Separate Meetings for Asbestos and Permit Fees
- Preparing Fee “Glossary” and Answers to Questions from stakeholder process

# Timeline for Rulemaking - tentative

- April – May 2015 : Finalize Fee Stakeholder Discussions
- May 28, 2015: Present proposed fee structure to Missouri Air Conservation Commission (MACC)
- June 25, 2015: MACC approve department to start rulemaking.
- July 2015: File proposed rulemaking

# Timeline for Rulemaking-continued

- 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



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DEPARTMENT OF  
NATURAL RESOURCES

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**Questions?**

Division of Environmental Quality Director: Leanne Tippett Mosby

Date: April 30, 2015

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