

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

---

May 19, 2015

1:30 p.m.

# 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



## 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
0-30	350	123	\$750
31-60	75	17	\$1,000
61-90	20	4	\$1,250
over 91	35	7	\$1,500

\*\* 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

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



**MISSOURI**  
DEPARTMENT OF  
NATURAL RESOURCES

---

**Questions?**

# Timeline for Rulemaking - tentative

- April – May 2015 : Finalize Fee Stakeholder Discussions
- May/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-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

Division of Environmental Quality Director: Leanne Tippett Mosby

Date: April 30, 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.