

Hazardous Waste Program Fee Stakeholder Meeting

March 13, 2015

Fee Stakeholder Meeting Agenda

- Overview of February Tiered Registration Proposal
 - Comments Received
 - Implementation
- Discussion
- Future Meetings
- Next Steps

Tiered Registration Fee Proposal

Fee	Amount	Conditions
Generator Registration and Renewal	<p>\$150 per year - CESQGs</p> <p>\$150 per year - SQGs</p> <p>\$425 per year - LQGs</p>	
In-state Generator	\$7.00 per ton	<p>Min of \$200*</p> <p>Max of \$52,000</p>
Out-State Generator	\$2.00 per ton	
Land Disposal	\$30 per ton	Not applied to < 10 tons
Offsite Transportation	\$2.00 per ton	Not applied to < 10 tons

*Minimum applied at one ton or less and \$7.00 for each additional ton.

Tiered Registration Fee Proposal

CALCULATOR FOR INPUT					
Fee Type & Current Fee Level	Current Revenues based on Fiscal Year 2014 Reporting data	Fiscal Year 2014 Permits/Applications/ Hours/Tons per Year	Potential Fee Level or Adjustment	Projected Additional Revenue at Adjusted Fee Level	Projected Total Revenue

Fee Structures that can be Changed by Rule by SB642 Process					
Generator Registration and Renewal - \$100 per year - CESQG	\$ 263,000	2,630	\$ 150.00	\$ 238,800	\$ 501,800
SQG			\$ 150.00		
LQG			\$ 425.00		
In-State Generator - \$5 per ton	\$ 710,055	267,774	\$ 7.00	\$ 240,281	\$ 950,336
<i>Minimum Fee - \$150 (1,362 generators in Fiscal Year 2014)</i>			\$ 200.00	Last Ton paying Min	1
<i>Maximum Fee - \$52,000 (2 generators in Fiscal Year 2014)</i>			\$ 52,000		
Out-State Generator - \$2 per ton	\$ 360,428	180,214	\$ 2.00	\$ -	\$ 360,428
<i>Minimum Fee</i>		No			
<i>Resource Recovery Facilities Pay? Same rate as TSDFs</i>		No		\$ -	\$ -
Land Disposal - \$25 per ton	\$ 134,851	5,394	\$ 30.00	\$ 26,970	\$ 161,821
Offsite Transportation - \$2 per ton	\$ -	0	\$ 2.00	\$ -	\$ -
			Additional Fees	\$ 506,051	\$ 1,974,385

Tiered Registration Fee Proposal - Comments

- Proposal posted on Feb 24th
- Notice sent out to stakeholders on our list serves, requesting responses by March 11th
- Received one alternative proposal from REGFORM
- Received one comment about the need to look at multiple generator fees being assessed to facilities that are near contiguous

Alternative Tiered Registration Fee Proposal

Fee	Amount	Conditions
Generator Registration and Renewal	\$150 per year - CESQGs \$150 per year - SQGs \$500 per year - LQGs	
In-state Generator	\$6.00 per ton	Min of \$200* Max of \$58,000
Out-State Generator	\$2.00 per ton	
Land Disposal	\$30 per ton	Not applied to < 10 tons
Offsite Transportation	\$2.00 per ton	Not applied to < 10 tons

*Minimum applied at one ton or less and \$6.00 for each additional ton.

Alternative Tiered Registration Fee Proposal

Fee Type & Current Fee Level	Current Revenues based on Fiscal Year 2014 Reporting data	Fiscal Year 2014 Permits/Applications/ Hours/Tons per Year	Potential Fee Level or Adjustment	Projected Additional Revenue at Adjusted Fee Level	Projected Total Revenue
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Fee Structures that can be Changed by Rule by SB642 Process

Generator Registration and Renewal - \$100 per year - CESQG	\$ 263,000	2,630	\$ 150.00	\$ 272,850	\$ 535,850
SQG			\$ 150.00		
LQG			\$ 500.00		
In-State Generator - \$5 per ton	\$ 710,055	267,774	\$ 6.00	\$ 200,781	\$ 910,836
<i>Minimum Fee - \$150 (1,362 generators in Fiscal Year 2014)</i>			\$ 200.00	Last Ton paying Min	1
<i>Maximum Fee - \$52,000 (2 generators in Fiscal Year 2014)</i>			\$ 58,000		
Out-State Generator - \$2 per ton	\$ 360,428	180,214	\$ 2.00	\$ -	\$ 360,428
<i>Minimum Fee</i>		No	\$ -		
<i>Resource Recovery Facilities Pay? Same rate as TSDFs</i>		No		\$ -	\$ -
Land Disposal - \$25 per ton	\$ 134,851	5,394	\$ 30.00	\$ 26,970	\$ 161,821
Offsite Transportation - \$2 per ton	\$ -	0	\$ 2.00	\$ -	\$ -
			Additional Fees	\$ 500,601	\$ 1,968,935

Tiered Registration Fee Proposal - Comments

- Need for an exemption from the LQG registration fee for sites in close proximity and operated by a single entity. It was noted that these sites are typically:
 - Managed under a single contingency plan
 - Have unified training programs
 - Have a single repository for manifests and other required records, and a
 - Single point of contact for DNR inspectors

Tiered Registration Fee Proposal - Implementation

- Expect to implement fee collection similar to current registration fee
 - Collect initial fee at registration
 - Send annual billings for renewal
 - Initial registrations received after Oct 1 of the year would not be assessed a renewal fee for the next year.

Tiered Registration Fee Proposal - Implementation

- Generator registration status changes
 - For changes from CESQG or SQG to LQG, the generator would need to pay the difference in fees.
 - For changes in status from LQG to SQG or CESQG, the generator would not need to pay any additional fee.

Other Fee Collection Implementation Issues

- In-State Fee Minimum – The \$200 minimum will be assessed on the first ton, and each additional ton, or portion thereof, will be charged at the in-state rate.
- Land Disposal Fee – A partial ton will be charged at the full rate to be consistent with how in-state and out-state fees are currently collected.



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Discussion

Draft Timeline for Rulemaking

- April 2015: Present proposed fee structure to Hazardous Waste Management Commission
- May/June 2015: Seek Commission approval and then file proposed rule
- August 2015: Hold public hearing
- October 2015: Obtain final approval from Commission and file orders of rulemaking





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Future Meeting Dates