

# **Title V Fees**

## **For NACAA Fall Membership Meeting**

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# Title V Fees in WI - Background

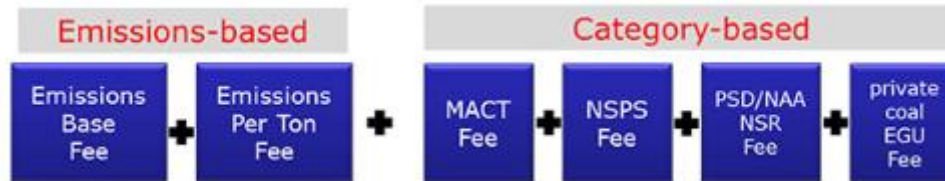
## Title V Operation Permit Fee History

- Increased in the FY99-01 biennial budget - Fee: \$35.71/ton (capped at 5,000 tons)
- Increased again in 2013 – Tiered fee structure
- Notice of Deficiency (NOD) resolved in 2004
- Fee adjustments are done through law and are not automatic

## Title V Operation Permit WI Background

- Number of Title V sources has continued to decrease over time
- Staffing levels have decreased
- Program has a culture of improvement and has created many efficiencies over the years, especially since 2004
- Even with the fee increase in 2013, WI operates with one of the leanest budgets in the Midwest

# Operation Permit Fee Structure in WI



- Fee structure for those with Title V permits:
  - Base fee: range \$900-3,000, based on range of total actual emissions
  - Add \$35.71 per ton actual emissions
  - Add category fees:
    - NESHAP/NSPS applicability - \$960
    - PSD/NAA permits - \$1,500
    - EGUs - \$46,980

<http://dnr.wi.gov/topic/AirPermits/AnnualFee.html>
- Simple fee structure for small sources:
  - \$400 per year if minor permit or ROP
  - \$4,100 per year if synthetic minor permit  $\geq 80$  TPY

<http://dnr.wi.gov/topic/AirEmissions/Fees.html>

# Strategies employed in 2012 - 2013

## Willingness to adjust/react

1)

FY14	FY15	Emission Fee = 104% of the previous year			
		FY16	FY17	FY18	FY19
\$46.71/ton	\$59.81/ton	\$62.20/ton	\$64.69/ton	\$67.28/ton	\$69.97/ton

2) Per ton fee increase, plus base fee increase

3) Base fee increase

## Focus on the benefits of the Title V program

- Jobs and business growth
- Benefits to facilities

## Consequences of a Title V program that is not well funded

- Sanctions
- EPA-run program

## Constantly building and broadening support

- Administration
- Stakeholders

# Strategies that will be employed in 2019 - 2021

## Utilize all strategies from last time

### Additional Strategies

- Ensure a right-sizing in staffing
- Meet all permit metrics
- Employ strong work planning
- Make difficult decisions and sticking with them
- Manage stress
- Utilize and all hands on deck approach
- Run the leanest program
- Utilize and refine processes/tools

