

Title V

Workload Analysis

Fiscal Year 2019-2020



Division of Air Pollution Control

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Executive Summary

Title V Workload Analysis
By the
State of Tennessee
Department of Environment and Conservation
Division of Air Pollution Control

Title V of the Clean Air Act (CAA) and its implementing regulations in 40 CFR Part 70 require the Division of Air Pollution Control to operate a Title V Operating Permit Program. Paragraph 502(b)(3) of the CAA and 40 CFR 70.9 require the collection of fees sufficient to fully fund the program. The proposed methods for implementation and the evidence of financial adequacy to implement and operate a federally approved CAA Title V Operating Permit Program (Title V Program) are described herein.

The CAA Amendments of 1990 included many changes and substantive differences in the body of regulations that comprise the CAA. None are as far reaching in effect as the regulations that detail the procedures for an operating permit program for air contaminant sources and for assessment and collection of fees to allow the regulated sources to pay for the permitting related activities. Each permitting authority identifies, inventories, assesses, and issues permits to all affected sources. Title V fee collection must provide the means for each state air pollution program or permitting authority to fully fund Title V work efforts.

The Division of Air Pollution Control (the Division or APC) within the Tennessee Department of Environment and Conservation (TDEC or the Department) is responsible for permitting air contaminant sources in Tennessee. Upon review and acceptance of the Title V permitting program by the United States Environmental Protection Agency (EPA) on August 28, 1996, the Division became the State's major source Title V permitting authority in 91 of 95 counties in Tennessee. Davidson, Hamilton, Knox and Shelby counties have local air pollution control programs that operate under Certificates of Exemption from the Tennessee Air Pollution Control Board. These agencies regulate the Title V sources within their jurisdictions that are not owned by the State of Tennessee. Local air program activities are not addressed in this plan. TDEC retains the permitting authority for state-owned sources in these counties.

Title V related activities are projected to require 58.9 full-time equivalent (FTE) positions in fiscal year 2019-2020 (FY2020). Due to financial constraints, the Division plans on maintaining no more than 52.0 Title V-related FTEs during FY2020.

This Implementation Plan consists of eleven (11) separate functional units within the Division, plus the Small Business Environmental Assistance Program¹, which have various responsibilities and functions related to Title V. Briefly, these units are:

- Administrative Services
- Director's Office
- Small Business Environmental Assistance
- Compliance Validation
- Enforcement
- Field Services
- Permitting
- Regulatory Development
- Emissions Inventory and Special Projects
- Technical Services
- Quality Assurance

The activities of each of these units are described in this Workload Analysis. Each functional unit has identified that portion of its total workload that can be attributed to Title V activities. In addition to the activities described in this plan, support services are provided to the Division by other bureaus, divisions, and offices within TDEC and the Bureau of Environment (BOE). Each of the divisions and offices within TDEC are charged for these services in accordance with formulae established by TDEC and BOE. Historically, a portion of these TDEC General and Administrative (G&A) expenses are charged to Title V fees. However, due to financial constraints, no TDEC G&A expenses are being charged to APC during fiscal year 2018-2019 (FY2019) or will be charged to APC during FY2020. This is a temporary relief of a line item until appropriate funding mechanisms can be developed and implemented. Further descriptions of these support services are described in the section of this plan entitled "TDEC General and Administrative Expenses".

For FY2020, the Division will be retaining the \$7500 minimum fee, a \$4000 base fee, and the following dollar/ton amounts for all source categories as follows:

- \$33.50 / Chargeable Ton of Allowable Emissions for non-EGU sources
- \$47.00 / Chargeable Ton of Allowable Emissions for EGU sources

- \$53.50 / Chargeable Ton of Actual Emissions for non-EGU sources
- \$75.00 / Chargeable Ton of Actual Emissions for EGU sources

If a facility's base fee plus dollar per ton fee is less than \$7500, the facility will pay a \$7500 minimum fee.

The part 70 presumptive fee rate (\$/ton) effective for the 12-month period of September 1, 2018 through August 31, 2019 is \$51.06. This fee rate represents an increase of 2.41921% (or \$1.21) from the fee rate in effect for the prior 12-month period (\$49.85). This increase is based on a calculation of the average monthly change in the Consumer Price Index (All Urban Consumers) for the 12-month period of September 2018 through August 2019 as reported by the U.S. Bureau of Labor Statistics. This information is included for reference purposes only, since Tennessee's Title V fees are not currently based on the federal presumptive minimum fee rate.

¹ Subparagraph 502(b)(3)(A) of the CAA requires that the costs of programs established to fulfill the requirements of section 507 of the CAA (i.e., small business stationary source technical and environmental compliance assistance programs) be funded by Title V fees.

INTRODUCTION

Title V of the CAA mandates that states develop a major source operating permit program, commonly called the Title V Operating Permit Program. The CAA further mandates that the program be funded solely through fees collected from affected sources. Additionally, the CAA requires that the activities of a Small Business Assistance Program must be paid through these fee collections. Subparagraph 502(b)(3)(A) of the CAA requires that a state must establish a fee schedule that results in the collection and retention of revenues sufficient to cover the permit program costs. Subparagraph 502(b)(3)(B) of the CAA states that a fee program shall be deemed adequate if the amount of fees collected is no less than \$25 per ton of actual emission, as adjusted by the percentage, if any, by which the Consumer Price Index for the most recent calendar year ending before the beginning of such year exceeds the Consumer Price Index for the calendar year 1989 (i.e., the “presumptive minimum” fee). Should a state elect to establish a fee schedule that would result in the collection and retention of an amount less than the amount that would be presumed to be adequate using the presumptive minimum fee approach, the state must provide a detailed accounting that its fee schedule meets the requirements of 502(b)(3)(A). The Tennessee Air Pollution Control Board has historically elected to prepare an annual workload analysis and set the fees for the current and upcoming year(s) instead of using the presumptive minimum approach.

EPA regulations promulgated to implement and more thoroughly describe Title V may be found at 40 CFR Part 70. Section 70.9 of the federal regulations describes the requirements for the fees in detail.

The workload analysis is prepared in accordance with Tennessee Air Pollution Control Regulation (TAPCR) 1200-03-26-.02(9)(d) to provide justification of fees to the public, the regulated community and the EPA. Additionally, disclosure of this information leads to the development of informed consent and, therefore, acceptance of the program by stakeholders.

On December 13, 2017, the Division issued a Title V workload analysis that covered fiscal years 2017-2018 (FY2018) and 2018-2019 (FY2019). This workload analysis reflects projected FY2019 workload and a projected workload for fiscal year FY2020.

Many complex requirements are mandated in the CAA and the Part 70 regulations that serve to demonstrate that the state permitting agency will be able to carry out its responsibilities. Section 70.4(b)(8) calls for a description of the program, a demonstration of fiscal soundness of the planned program based on fee projections, and planning for adequate personnel to administer the program.

Several things could happen to require that the workload analysis be revised and subsequently modified. These possibilities include but are not limited to:

- Changes in the actual or allowable emissions base upon which the fee rate was calculated;
- Changes in the air contaminant source population will alter both the emission base and the workload. Many sources have obtained “conditional major” status wherein they opt out of Title V by limiting their potential to emit via a federally enforceable limitation. The Division views the work effort to make a Title V source a conditional major source as Title V work. These sources require more frequent inspections and record reviews to verify that they are operating below the Title V thresholds; and
- Changes in applicable requirements mandated by EPA will also alter the workload.

The workload analysis is provided for each functional unit of the Division. The work of each unit plus the Title V work from the Small Business Environmental Assistance Program is described as it relates to the requirements of Title V. Estimated hours necessary to accomplish the task and, for some functional units, the numbers of tasks to be completed per year are projected.

Combining the hours projected to complete the Title V work and dividing it by 1,609 hours per employee available work time yields the total number of full-time equivalents (FTEs) needed to conduct Title V work.

The 1,609 hours of work time per employee was derived as follows:

Scheduled Payroll Hours per Year	=	1950
Less: Holiday, Vacation & Sick Leave Hours (12.5 Days + 21 Days + 12 Days) X 7.5 hrs./day	=	<u>- 341</u>
Total Work Hours per Employee	=	<u>1609</u>

For many of the work units described in the following sections, the Title V eligible work associated with members of each work unit are estimated as a percentage of total time. All employees are required to enter work time into the Department's personnel management system known as Edison for payroll purposes. Starting with FY2018, the Division made changes to the Edison system that tied all time and other expenses, such as travel expenses, directly to the appropriate funding source. For the Division of Air Pollution Control, available funding types include Title V, non-Title V², and EPA's fine particulate matter grant. This new system also allows the Division to track time and expenses on a program and location level. For all work activities that could not be directly related to a funding type, such as training, administrative functions, and leave, time is charged to a pre-set Title V/non-Title V "split" ratio. The split ratio has initially been set based on a historical ratio of 52% Title V/48% non-Title V. For most of the work units described in this workload analysis, Title V and non-Title V workload estimates for FY2020 are based on actual data obtained during FY2018 as specified in following sections of this analysis. These changes to Edison have resulted in a significant improvement in assessing the percentage of each work unit's time, Title V work, and, as a result, a better estimate of future Title V expenses.

In addition to Edison, most of these work units track Title V and non-Title V time on a daily basis using the Division's database known as Smog Log. In addition to specifying whether work is Title V or non-Title V related, Smog Log allows some work units to track time spent on specific projects, such as a permit or inspection. For employees that track time using Smog Log, time reported in Smog Log is required to be consistent with time reported in Edison.

² Non-Title V funding includes annual emissions fees paid by non-Title V facilities, construction permit application fees, modification permit application fees, motor vehicle emissions inspection and maintenance fees, visible emissions certification fees, section 105 air quality grant funds received from EPA, state appropriations, and civil penalties.

ADMINISTRATIVE SERVICES

Administration involves activities both directly and indirectly associated with support of the Title V Program. These activities include permit and report tracking, issuing of Notices of Authorization to operate under permits-by-rule, training coordination, processing travel claims, receptionist duties, website management, APC board support, fee support, database support, and customer inquiries. The Administrative Services section also provides general administrative support for the entire Division including personnel activities, grants support, management of supplies, reception desk, etc.

CALCULATION BASIS

Administration includes eight positions. One of the administrative positions deal strictly with the Division’s vehicle inspection and maintenance program (not a Title V expense). This leaves seven positions as this part of the analysis.

ASSUMPTIONS

For the purpose of this analysis, with the exception of position that is primarily dedicated to motor vehicle inspection and maintenance work, 52% of Administrative Services Time is assumed to be Title V.

Table 1 – Administrative Services Workload

ACTIVITIES	ESTIMATED TITLE V HOURS/YR	ESTIMATED TITLE V FTE/YR
Administrative Support	5857	3.6

DIRECTOR’S OFFICE

The office of the Director is responsible for overseeing the operation of the functions necessary for the development and performance of the Division, including the Title V Program. The Director serves as the Technical Secretary of the Air Pollution Control Board and carries out all of the statutory and regulatory responsibilities of the Technical Secretary. The Director’s Office is also responsible for coordinating and providing technical support to the Air Pollution Control Board, as well as providing support to the Tennessee Emergency Management Agency during emergency events, both natural and manmade, that impact ambient air quality. The Director’s office provides program direction and oversight, coordinating Departmental goals with Division programs and providing reporting, support documents and informational documents for the Department and legislature concerning the operation of the Division. The Director’s Office is also responsible for the financial performance of the Division and all associated reporting as well as procurement for all Division-related services and product needs and grant management and support. The Director’s Office includes the Director, the Deputy Director of Permitting and Regulatory Development, the Deputy Director of Environmental Measurement and Compliance Assurance, the technical lead for Environmental Measurement and Compliance Assurance, the Environmental Fellow, the Business Administrator, and the Procurement Officer. Activities of the Deputy Director for Field Services are included in the Field Services portion of this analysis. Activities of the technical lead for Permitting and Regulatory Development are included in the Permitting portion of this analysis.

CALCULATION BASIS

Percent Title V workload for the Deputy Director for Permitting and Regulatory Development (47%) and the Deputy Director and the technical lead for Environmental Measurement and Compliance Assurance (60%) is based on actual data gathered during FY2018 for their related programs. Title V time for all other positions is based on a default of 52% Title V.

ASSUMPTIONS

It is assumed that the Title V activities of the Deputy Director of Permitting and Regulatory Development are the same percentage as the total staff and managers in the Permitting, Regulatory Development, and Emissions Inventory program. It is assumed that the Title V activities of the Deputy Director and the technical lead of the Environmental Measurement and Compliance Assurance programs are the same percentage as the total staff of the Compliance Validation, Enforcement, Technical Services, and Quality Assurance programs. For all other positions, 52% of Director’s Office time is assumed to be Title V.

Table 2 – Director’s Office Workload

ACTIVITIES	ESTIMATED TITLE V HOURS/YR	ESTIMATED TITLE V FTE/YR
Deputy Director of Permitting and Regulatory Development	756	0.47
Deputy Director and Technical Lead of Compliance Assurance and Environmental Measurement	1931	1.20
Four Other Director’s Office Positions	3347	2.08
TOTAL	6034	3.8

SMALL BUSINESS ENVIRONMENTAL ASSISTANCE PROGRAM

Program Overview

Section 507 of the CAA requires an environmental compliance assistance program in each state to support small businesses in understanding and complying with air quality regulations. The federal Clean Air Act requires that this program be funded entirely with Title V fees. Tennessee's program provides confidential assistance free of charge to small businesses. Services include permitting assistance, onsite visits, training, a toll free hotline, regulatory notifications, outreach, and guidance in preventing and eliminating non-compliance situations. A small business is defined as one that has 100 or fewer employees, is not a major stationary source, and meets the federal Small Business Act's definition of a small business. TDEC policy has expanded the definition of Small Business to include any source that does not have an employee dedicated to environmental compliance.

Required Program Components

(1) State Ombudsman

The Small Business Ombudsman represents small business in regulatory matters, identifies, and proposes solutions to small business technical and compliance problems.

(2) Environmental Technical Assistance

Technical Assistance staff members provide technical, administrative, and permitting assistance. Staff members inform businesses of regulatory requirements in easy-to-understand language. When needed, staff members conduct on-site visits and provide training opportunities.

(3) Compliance Advisory Panel (CAP)

An advisory panel comprised of individuals appointed by the Governor and the legislature, plus one Department representative, is required. The Panel advises and provides technical, administrative and evaluation assistance to the program. The CAP is a seven member panel.

Program Activities

New Regulations/Sources

- Staff members review regulations, determine potentially impacted sources, develop a strategy for notification and assistance, develop compliance assistance tools, conduct training programs, and work with regulatory programs on outreach activities.
- Staff members assist the Division of Air Pollution Control in developing regulations and programs that impact small businesses.
- Staff members assist potentially new companies in understanding regulatory requirements.
- Staff members participate in monthly conference calls on regulations with other SBEAPs and EPA.

Existing Sources

- Staff members respond to small business compliance and permitting questions.
- Staff members monitor enforcement reports to determine sectors with compliance problems and develop compliance assistance strategies.
- Staff members assist companies in meeting permit conditions, including developing tools to meet recordkeeping requirements.
- Staff members assist companies in resolving non-compliance issues, as well as assisting companies in utilizing the Department's self-disclosure audit policy.

Table 3 – Small Business Environmental Assistance Program Workload

ACTIVITIES	ESTIMATED TITLE V HOURS/YR	ESTIMATED TITLE V FTE/YR
Compliance assistance	1609	1
Workshops/training events	804.5	0.5
Material development	402.25	0.25
Regulatory Development/Notification	201.125	0.125
Administration/Other	201.125	0.125
TOTAL	3218	2.0

COMPLIANCE VALIDATION

The Compliance Validation program participates in compliance assurance activities of the Division. Compliance Validation provides a key component in the Division’s quality assurance program that ensures the accuracy of the data being submitted by Title V Sources certifying compliance. Continuous Emission Monitoring Systems (CEMS) are utilized by some Title V sources to determine compliance on an ongoing basis. Compliance Validation will conduct audits of CEMS data to ensure the data submitted is accurate. Compliance Validation conducts Visible Emission Evaluator Certification (VEE) schools to train state and industry personnel to certify compliance with visible emission standards, and the Compliance Validation program utilizes its source testing capabilities to determine compliance of Title V sources with respect to mass emission standards. Sources with control equipment are periodically checked to assure that control equipment is being maintained and monitoring parameters are sufficient. Responsibility for asbestos renovation and demolition activities was moved to this program in FY2017, but this activity is not considered Title V time. The miscellaneous category of work includes such things as activities in support of the permitting program, regulatory development, State Implementation Plan (SIP) support, and assigned special projects previously incorporated into major work duties.

The Compliance Validation program has eight positions.

CALCULATION BASIS

Actual data compiled from activities documented during FY2018 indicates that approximately 88% of the Compliance Validation program work, when excluding asbestos demolition and renovation related activities, is Title V related.

ASSUMPTIONS

Estimated Compliance Validation workload, excluding asbestos work, is listed below, and is expected to remain constant in the future. Of the seven existing non-asbestos positions, one was recently vacated due to promotion. It is assumed that one position will remain vacant and the duties will be reallocated or reprioritized. When calculating Title V time, it is assumed that all activities are 88% Title V-related.

Table 4 – Compliance Validation Program Workload

ACTIVITIES	ESTIMATED TITLE V HOURS/YR	ESTIMATED TITLE V FTE/YR
Title V CEM Activities	1283	0.80
Title V Source Testing Activities	6040	3.75
Program Management	704	0.44
Additional Training ³	440	0.27
TOTAL	8467	5.3

³ Beyond the hours deducted from total available hours, see page 4.

ENFORCEMENT

The Enforcement program is responsible for processing violations discovered in Tennessee by individuals, government agencies, and facilities. Processing of violations includes responding to the regulated community when a violation occurs, issuing Technical Secretary’s Orders, issuing letters resolving noncompliance, and tracking penalties and compliance schedules in orders. Additionally, Enforcement staff track and quality assure (QA) compliance-related data using the Division’s internal compliance database (Smog Log). Much of this data is available to the public via the departmental dataviewer website. Enforcement also serves as a point of contact in enforcement matters between the Division and EPA Region 4.

The Enforcement program is also responsible for managing Smog Log. This includes writing and modifying code in development and then implementing revisions with the assistance of the State of Tennessee’s Strategic Technology Solutions. Enforcement staff members review requests from Division staff for additional features to help determine which requests should be implemented as time and resources allow.

Enforcement staff members update EPA’s Compliance and Enforcement database (Integrated Compliance Information System [ICIS-Air]) on a weekly basis, ensuring the data in the Smog Log database is properly reflected in ICIS-Air. Enforcement is also responsible for entering and quality assuring all data entered in ICIS-Air. The data reported to ICIS-Air includes inspections, report reviews, stack tests, continuous emission monitoring audits, formal and informal enforcement actions, penalties assessed and collected, Federally Reportable Violations, High Priority Violations, facility status (T5, non-T5, CM), applicable air programs, facility operational status, etc. The data reported to ICIS-Air is available to the public via EPA’s ECHO website.

CALCULATION BASIS

Actual data compiled from activities documented during FY2018 indicates that approximately 46% of the Enforcement program work is Title V related.

ASSUMPTIONS

Enforcement workload is based on violations reported or discovered by the Division. The Division does not project future violations. Therefore, projected Enforcement program workload is assumed to be the same as historical workload. Of the seven existing positions, one was recently vacated due to retirement. It is assumed that this vacated position will not be filled and the duties will be reallocated or reprioritized. An employee and position within enforcement was transferred to the Quality Assurance Program to address workload related needs when a position in that group was vacated. The Enforcement Program workload impact of this change has yet to be determined. When calculating Title V time, it is assumed that all activities are 46% Title V-related.

Table 5 – Enforcement Program Workload

ACTIVITIES	ESTIMATED TITLE V HOURS/YR	ESTIMATED TITLE V FTE/YR
Administration	55	0.04
Case Processing	839	0.52
Enforcement Related Activities	299	0.19
Program Management	60	0.04
Special Projects	60	0.04
Training	230	0.14
ICIS-Air Data Management	1472	0.91

APC Data Management	1196	0.74
Computer Hardware/Software	230	0.14
TOTAL	4441	2.8

FIELD SERVICES

Field Services program staff are located throughout the state in seven Environmental Field Offices: Johnson City, Knoxville, Chattanooga, Cookeville, Nashville, Columbia, and Jackson. Major duties accomplished by field services staff that are associated with the Title V Program include compliance inspections of Title V stationary sources, review of the majority of Title V semi-annual reports and annual compliance certifications, operation and maintenance of the state’s ambient air monitoring network, and investigation and resolution of complaints.

Other duties include responding to inquiries from citizens, local officials, and the regulated community; review and discussion of draft permits; follow-up on enforcement related issues; staff training; involvement in emergency response incidents; participation in public meetings and hearings, and various special projects; providing support to individuals and companies with fleets about mechanical issues related to the Motor Vehicle Inspection and Maintenance program (not Title V work); and maintenance of reports, records and other correspondence.

There are 35 positions within this program, one of which is dedicated to motor vehicle inspection and maintenance work.

CALCULATION BASIS

Inspection workload is based on the number of planned inspections and average inspection time (including report reviews). Title V complaint workload is assumed to be 5% of total complaint workload. The Field Services Program also conducts motor vehicle inspection work, which is not a Title V activity. Actual for the remaining work, including program management, is estimated to be 48% Title V related.

ASSUMPTIONS

Each Title V inspection is projected to take 35.5 hours on average, based on previous year’s inspections. There are 228 Title V sources plus 9 additional Eastman inspections. All other time is based on 48% of the estimated total time for each activity. Two existing vacant positions will remain vacant and one additional position is expected to become vacant in the first half of FY2020. Duties associated with these positions will be reallocated or reprioritized.

Table 6 – Field Services Title V Workload

ACTIVITIES	ESTIMATED TITLE V HOURS/YR	ESTIMATED TITLE V FTE/YR
Title V Inspections	7524	4.68
Complaint Investigations	238	0.15
Ambient Monitoring	2544	1.58
Training	1632	1.02
Special Projects	4089	2.54
Program Management	5406	3.36
Other Title V Activities	1643	1.02
TOTAL	23,067	14.4

PERMITTING

Permitting staff are located in the Nashville Central Office (with the exception of two permit staff members located in the Knoxville Environmental Field Office). Starting January 1, 2019, the permitting program was reorganized to a sector-based permitting structure consisting of four permitting sections. Each section will consist of one Environmental Manager 3, one Environmental Consultant 3, and five permit writers. This will result in a total of 20 permit writers, four Environmental Consultant 3s, and four Environmental Manager 3s for the entire Permitting program. A Deputy Director oversees the entire program with the technical assistance of a TDEC-Environmental Consultant 4 (EC4). The Deputy Director's time is included in the Director's office and the EC4 time is included here.

Permitting staff time spent on enforcement activities related to Title V facilities is included in this section (report review, issuance of Notices of Violation). Enforcement support provided by permitting staff is also included here.

Responsibilities:

The Permitting program has the following responsibilities:

- Issuance of minor source construction and operating permits; review of and response to insignificant activity determinations; issuance of minor source operational flexibility determinations; and issuance of general permits and general permit Notices of Coverage (funding for minor source permitting is not included in this analysis)
- Issuance of conditional major source construction and operating permits (only funding of the first conditional major operating permit that must undergo Title V public notice procedures for a facility is included in this analysis)
- Issuance of construction permits and Title V operating permits to Title V facilities
- Issuance of administrative amendments, minor modifications, and significant modifications to Title V operating permits, as well as operational flexibility determinations
- Issuance of Prevention of Significant Deterioration (PSD) and Non-Attainment New Source Review (NSR) construction permits
- Review of most MACT and NSPS reports, some Title V semi-annual reports (SARs), some annual compliance certifications (ACCs), and review of plans required by MACT and GACT standards (the remaining MACT and NSPS reports, SARs, and ACCs are reviewed by the Field Services Program)
- Issuance of Notices of Violation; assistance to the Enforcement Program, TDEC's Office of General Counsel, and EPA's Office of Enforcement and Compliance Assurance pertaining to enforcement of violations discovered by the Permit Program
- Review of Title V fee Actual Emissions Analysis Report (AEAR) calculations
- Special projects as assigned (only those projects related to Title V issues are included here)
- Attendance at training sessions to stay knowledgeable about federal and state requirements, and remain familiar with source types and new emission control devices
- Management of the sections to ensure that the permitting program operates efficiently

Table 7 – FY2017-2018 Title V Permitting Activity⁴

ACTIVITY	Issued, Canceled, or Acknowledged	Received
Construction Permits – Major NSR (PSD and NA-NSR)	1	3
Major NSR Plant Wide Applicability Limit Permits	0	1
Construction Permits – T5 Non-Major NSR	47	54
Title V Permits – Initial	6	4
Title V Permits – Renewal (includes CAIR/Acid Rain)	35	49
Significant Modifications	16	13
Non-Significant Modifications	199	204
Initial Conditional Major Sources	1	4
Semi-annual Reports	61	59
Annual Compliance Certifications	30	30
T5 NESHAP/NSPS Reports	410	387

* Note: In some cases, a single construction permit or permit modification may actually address two or more separate requests. Applications are canceled for many reasons, such as a determination that the source does not need a permit, the combination of permits for several sources into one permit, withdrawal of the application by the applicant, and failure of the applicant to respond to a request for additional information are examples. The majority of Title V semiannual reports and annual compliance certifications are reviewed as part of the annual inspection conducted by the Field Services staff. This table only reflects those reports reviewed by permitting staff.

Table 8 below shows the number of applications, modifications and reports in the system as of July 2018. Table 9 is a projection of the hours that will be necessary to review and complete current and new submittals, conduct report reviews, perform Title V related fee, enforcement, and special projects, and for necessary technical training.

Table 8 – Current and Anticipated New Applications, T5 Sources Only

ACTIVITY	Currently in System as of July 2018	EXPECTED NEW SUBMITTALS
T5 Construction Permits - Non-Major NSR	11	40
T5 Construction Permits - Major NSR (PSD)	2	2
T5 Construction Permits - Major NSR (Non-Attainment)	0	0
Major NSR Plant Wide Applicability Limit (PAL) Permits	2	3
Title V Sources – Initial	7	4
Title V Sources – Renewal	68	56
CAIR and Acid Rain Permits	1	6
T5 Significant Modifications	9	20
T5 Non-Significant Modifications	53	213
Initial Issuance Conditional Major Sources	5	5
T5 Semi-annual Reports*	1	69
T5 MACT/NSPS Reports*	9	374
T5 Annual Compliance Certifications*	1	28

*This is the number of reports expected to be reviewed by permit writers. The majority of Title V semiannual reports and compliance certifications will be reviewed by Field Services staff.

⁴ Previous Title V Implementation Plans have included conditional major permit renewals and non-significant modifications at non-Title V facilities. Thus, previous plans may show higher numbers in these two categories.

CALCULATION BASIS

Of the twenty permit writers and four Environmental Consultant 3 positions specified in the first paragraph of this section, four of the positions (three permit writers and one Environmental Consultant 3) are currently vacant. The EC3 position is expected to be filled in FY2020 but the duties of the other positions will be reallocated or reprioritized until appropriate funding mechanisms can be developed and implemented. In addition, one position was recently vacated due to retirement, two positions were recently vacated due to promotion, and one position was vacated due to retirement in 2016.

ASSUMPTIONS

For the purpose of this analysis, it is assumed that the four positions vacated due to retirement and promotion will remain vacant.

Table 9 – Projected Permitting Workload

ACTIVITIES	ESTIMATED TITLE V HOURS/YR	ESTIMATED TITLE V FTE/YR
Title V sources permit preparation – new sources	560	0.35
Title V sources permit preparation – renewals	7840	4.87
CAIR and Acid Rain Permits	540	0.34
Initial Issuance Conditional major sources	700	0.44
Significant Modifications	680	0.42
Non-significant modifications	4034	2.50
Semiannual Report Review (T5 and MACT)	1164	0.72
Annual Compliance Certification Review	150	0.09
Program Management	3200	1.99
Training ⁵	2000	1.24
Special Projects	1890	1.17
Annual emissions fees analysis and related work	450	0.28
Enforcement	325	0.20
Permit preparation time for Title V, non-major NSR construction permits	800	0.50
Permit preparation time for major NSR permits	540	0.34
Permit preparation time for PAL permits	540	0.34
TOTAL	25,413	15.8

The Division has evaluated the trends in Title V permitting activity and FTEs as reported in this and previous workload analyses to determine if and how Title V staffing needs to change. For permits and amendments, the data shown in the table below shows the number of applications received followed by the number of permits or amendments issued during each fiscal year. The number of applications often exceeds the number of permits or amendments issued since it contains applications that were combined with other actions or cancelled. This data indicates that Title V permitting activity has remained relatively constant over the past four years.

⁵ Beyond the hours deducted from total available hours, see page 4.

Table 10 – Title V Permitting Trends (Received/Issued)

Permitting Activities Completed	FY2015	FY2016	FY2017	FY2018
T5 Construction Permits - Non-Major NSR	59/41	44/30	36/26	54/27
T5 Construction Permits - Major NSR (PSD)	0/2	2/1	0/1	3/1
T5 Construction Permits - Major NSR (Non-Attainment)	0/0	0/0	0/0	0/0
T5 Construction Permits – Amendments	32/30	26/22	28/25	19/16
Title V Permits – Initial	6/6	3/2	5/4	4/6
Title V Permits – Renewal (Includes CAIR/Acid Rain)	36/43	39/48	37/27	49/30
Initial Issuance Conditional Major Sources	1/0	2/1	1/1	4/1
T5 Significant Modifications	13/12	22/9	20/16	13/10
T5 Minor Modifications	103/74	106/61	97/69	97/67
T5 PAL Permits	0/0	0/0	1/0	1/0

Reorganization to Sector-Based Permitting:

Sector-based permitting is an organizational structure in which permit applications and reports are assigned to permitting sections according to the industry type. Sector-based permitting sections are organized so that sources subject to similar state and federal regulations and with similar processes are grouped into a single section. This will promote specialization by the management and staff of each of these sections, allowing for the development of skills and the training of staff to be targeted based on the types of industries and regulations that each section manages. This type of organization leads to permitting consistency for similar source types, efficiency in the permitting process, and a deeper understanding of sources and their applicable regulations by the permitting staff.

The Division recently completed reorganization to sector-based permitting. Current sector assignments for the four permitting sections are as follows:

Composite Materials Permitting Section

- Dry Cleaners, Fiberglass Reinforced Plastic, Natural Gas Distribution, Asphalt Plants, Minerals (including quarries and concrete plants), Gasoline Dispensing Facilities, Department of Energy Facilities, Crematories

Surface Coating and Combustion Permitting Section

- Surface Coating, Electric Generation, Incinerators, Boilers and Stationary Engines (including hospitals, schools, colleges, and universities, and military bases), Cotton Gins, Distilleries, Glass, Brick, Tile, Charcoal Production, Lead Acid Battery Plants

Chemical, Wood, and Food Permitting Section

- Chemical plants, Tires and Rubber Products, Commercial Ethylene Oxide Sterilizers, Mineral Wool Production, Polystyrene and Polyurethane Foam, Paint and Ink Manufacturing, Agricultural Products, Wood Products, Tobacco, Marine and Rail Transportation Facilities, Bakeries, Poultry, Feed and Grain, Bulk Petroleum Storage

Paper and Metal Permitting Section

- Pulp & Paper Mills, Printing & Coating, Primary and Secondary Metal Manufacturing, Landfills

All of the permits issued by each section are reviewed by the Environmental Consultant 3 within that section⁶. The Environmental Consultant 3 will review all permits for accuracy, clarity and consistency prior to issuance. The Environmental Manager 3 of each section will be responsible for timeliness, productivity, workload distribution, performance management, and other management responsibilities. The Environmental Manager 3s, and to a lesser extent the Environmental Consultant 3s, will also draft permits as necessary in order to ensure that permitting skills are maintained, to balance staff workload, and that permits requiring advanced permitting skills are handled. The Environmental Consultant 3s will also be responsible for developing “tools” to help improve clarity, consistency and efficiency such as standard permit conditions, permit templates for assigned industry types, development of additional general permits, and the development and implementation of a comprehensive permit writer training program.

Non-Title V Permit Alternatives:

General Permits and Permits-by Rule: The Division has been working the last several years to develop alternatives to traditional permits for certain categories of sources that could be considered insignificant except for the fact that a federal rule (MACT or NSPS) applies. Two new permit categories have been created through rulemaking, general permits and permit-by-rule. These traditional permit alternatives are currently only available to true minor sources, but as a result of the adoption of the federal rules some Title V and conditional major facilities will benefit by gaining the ability to classify some sources currently included in their permits as insignificant activities or insignificant emission units.

⁶ The EC3 position in the Paper and Metals permitting section is currently vacant. Therefore, permit reviews are being conducted by the EM3 of that section as well as the senior permit writer. This section also currently has fewer staff and thus assigned fewer sectors. The Surface Coating and Combustion permitting section currently has six permit writers and thus is assigned additional sectors. Once the vacant EC3 position is filled, staffing and sector assignments will be readjusted.

REGULATORY DEVELOPMENT

The Regulatory Development program has the following responsibilities:

- Development of revisions to Tennessee's air quality rules
- Development of revisions to Tennessee's State Implementation Plan (SIP)
- Computer modeling (dispersion modeling) to support the Division's permitting program
- Photochemical computer modeling to support the development of SIPs
- Policy analysis and development to assist TDEC's Policy Office or to address air quality-specific issues that are not assigned to the Policy Office
- Special projects as assigned
- Attendance at training sessions to stay knowledgeable of federal and state regulatory and SIP requirements, and technical training related to air pollution sources and controls
- Managing all aspects of the Middle Tennessee and Hamilton County vehicle emission testing programs and their associated functions, including contract negotiation and administration, public outreach, vehicle exemptions, waivers/variances, rule development and mobile model analyses. (non-Title V work)
- Transportation conformity involving the development of mobile emission budgets, calculation of emission credits associated with mobile sources using the latest version of the EPA Mobile model, and production of periodic emission inventories of the sources for submission to the EPA. Conformity responsibilities include implementation of any new rules or guidance, as well as being an active participant in the Interagency Consultation Procedures. Consultation Procedures involve EPA, FHWA, TDOT, state and local air agencies, and Metropolitan Planning Organizations (non-Title V work)
- Coordinates and participates in the implementation of diesel retrofit grant programs, including the writing of proposals for grant opportunities, overseeing the grant process, and fulfilling grant requirements, and providing technical support to other TDEC offices regarding diesel retrofit technology (non-Title V work)
- Assisting with all aspects of the Division's computer hardware and software including troubleshooting, training, and problem resolution
- Local program coordination with the four local air programs (Nashville/Davidson, Memphis/Shelby, Chattanooga/Hamilton, and Knoxville/Knox) to ensure local air regulations are as stringent as State requirements, as well as other oversight and coordination duties
- Management of the program to ensure it operates efficiently

CALCULATION BASIS

There are seven positions within this program, two of which are predominantly dedicated to non-Title V activities (motor vehicle emission testing, transportation conformity, and diesel retrofit program). There is also one photochemical modeling position currently located in the Emissions Inventory and Special Projects program that does work in conjunction with the Regulatory Development program. This position was recently vacated due to promotion and will remain vacant due to financial constraints. This position will be transferred to the Regulatory Development program. Duties of this position will be reallocated and reprioritized until appropriate funding mechanisms can be developed and implemented. One other position was recently vacated due to retirement. Duties for this position have been reassigned to existing staff and it is assumed that it will remain vacant.

ASSUMPTIONS

Certain Regulatory Development program activities are not Title V related activities. Other activities are partially Title V

related. The percent of these activities that are Title V fundable (45%) is based on actual data gathered during FY2018. Program management workload is based on the total percent Title V activity for the entire program (32%).

Table 11 – Regulatory Development Workload

ACTIVITIES	ESTIMATED TITLE V HOURS/YR	ESTIMATED TITLE V FTE/YR
Rule Development (45%)	579	0.36
SIP Development (45%)	507	0.31
Permit Modeling (45%)	797	0.50
Photochemical Modeling (45%)	724	0.45
Certificate of Exemption (45%)	217	0.14
Special Projects (45%)	362	0.22
Project Management (32%)	515	0.32
TOTAL	3701	2.3

EMISSIONS INVENTORY AND SPECIAL PROJECTS

The Emissions Inventory and Special Projects program has the following responsibilities:

- Collecting, quality assuring, and reporting annual and triennial emissions inventories from stationary sources
- Developing and submitting triennial emissions inventories for on-road mobile, non-road mobile and area source inventories (non-Title V work not included in this analysis)
- Managing the Division’s Air Emission Inventory databases and updating EPA’s databases
- Development and implementation of the Division’s online system for collecting annual and triennial emissions inventories and AEAR reports including training of regulated sources
- Requesting and collecting annual NOx and VOC emission statements from sources in applicable counties and providing technical assistance to those sources
- Providing technical support to the Department’s Division of Fiscal Services pertaining to air permit-related fee invoicing and tracking of fee payment (non-Title V work not included in this analysis)
- Title V fee AEAR tracking, review, data management, and, when necessary, enforcement
- Annual Title V and non-Title V fee invoicing and collections (only work relating to Title V fees is included in this analysis)
- Revisions to Title V and non-Title V fee systems (only work relating to Title V fees is included in this analysis)
- Special projects as assigned (only those projects related to Title V issues are included here)
- Attendance at training sessions to stay knowledgeable about federal and state emissions inventory requirements and technical training related air pollution sources and controls
- Management of the program to ensure it operates efficiently

CALCULATION BASIS

There are seven positions within this program. One emissions inventory/SIP development position was vacated in 2016 and will remain vacant. The fee specialist position in this program was vacated in 2018. There is also one vacant photochemical modeling position that will be transferred to the Regulatory Development program (see previous section). The Division plans to fill one position in FY2020 that will handle emissions inventory and fee responsibilities that were previously associated with these three vacant positions.

ASSUMPTIONS

Actual data compiled from all activities documented during FY2018 indicates that approximately 58% of the Emissions Inventory and Special Projects program work is Title V related. It is assumed that all activities are 58% Title V.

Table 12 – Emissions Inventory and Special Projects Workload

ACTIVITIES	ESTIMATED TITLE V HOURS/YR	ESTIMATED TITLE V FTE/YR
Emission Inventory	1983	1.23
Fee Collection, Development, and Support	1983	1.23
Program Management	933	0.58
Special Projects	701	0.44
TOTAL	5600	3.5

Emissions Inventory and Special Project Program Improvement Efforts:

SLEIS: Division staff are working on implementation of the State and Local Emissions Inventory System (SLEIS), a web-based application that will allow permitted facilities to compile and submit point source emissions inventory data to the Division in accordance with regulatory reporting. This new online tool will modernize and improve Tennessee's emission inventory work. APC received CROMERR certification on May 7, 2018, which will allow the use of SLEIS by the regulated community. APC pilot tested the new SLEIS application with a few select facilities in 2018 and has expanded the pilot test in 2019. Full scale use of SLEIS is expected with the 2019 annual emissions inventory reports due in 2020. In addition, APC worked with Tennessee Strategic Technology Solutions to link SLEIS to APC's in-house database, known as Smog Log, and to add modules to allow permit fee reporting (see below). The Division partnered with the Arizona Department of Environmental Quality on an EPA e-enterprise grant to provide funding for this effort.

Online Title V Fee Reporting: APC is working with Tennessee Strategic Technology Solutions to add a portal to the SLEIS emissions inventory application discussed above that will allow submittal of Title V Actual Emissions Analysis Reports (AEARs). Submission of online AEARs will allow for automated calculation of fees and the generation of invoices by the permittee. Use of SLEIS for AEAR submissions will also allow APC to access Title V fee related data on a real-time basis, which, in turn will allow for quicker and more accurate projection of Title V revenues. This improvement will be pilot tested in coming months and is expected to be in full production for Title V fees due in 2020.

TECHNICAL SERVICES

The primary responsibility of the Technical Services program is to monitor ambient air quality across the state to assess compliance with national ambient air quality standards. This is accomplished by operating a network of air monitoring stations throughout the state that record air quality data that is subsequently stored in EPA's national database. The work requires continuing evaluation of all monitoring sites to ensure that each site conforms to federal ambient air quality monitoring site criteria and remedying or relocating the sites to the extent necessary to render the site compliant. Monitors require bench and field servicing to ensure all components of the monitor are in compliance with manufacturer specifications and EPA requirements and are calibrated to assure they give a true reading of air quality. Shelter maintenance is also required to make certain the internal shelter temperature meet federal requirements, that the shelter has no air/water intrusion leaks, that periodic theft and vandalism damages are rectified, and that the electrical/data communication lines are properly connected. In the event of a lightning strike, significant effort must be undertaken to restore the site's operability. While the ambient air monitors measure the emissions impact of all types of air contaminant sources, a portion of those sources are Title V sources and those sources must pay a portion of the cost of those monitoring expenses.

As part of resolving the Sullivan County/Kingsport, Tennessee SO₂ nonattainment area, the Division recently installed two additional SO₂ ambient monitoring sites⁷. Over time, the Division hopes to reduce the number of monitoring sites when each monitor has sufficient data to make a clean data determination, thus allowing the Division to petition EPA to shut down the site. However, EPA approval is required before a site can be shut down. Long term, there will always be at least one site to satisfy minimum EPA maintenance area monitoring requirements. As the predominate source of SO₂ emissions in the area is a Title V source, the costs needed to conduct this monitoring would generally be covered using Title V fees.

The Technical Services program recently completed the process of performing an extensive update of the ambient air monitoring network called Project Restore. The Division was granted a one-time budget supplement of 1.55 million dollars from the State of Tennessee to purchase 10 air quality monitoring shelters, replace aging and obsolete ambient air monitoring equipment, and upgrade network communications. This one-time budget supplement granted by the state legislature provided the funding to complete Project Restore without the use of Title V funds.

It should be noted that the majority of the Division's cost of operating and maintaining its fine particulate matter monitoring network is currently funded by a CAA section 103 grant.

There are six positions in this program.

CALCULATION BASIS

The Division is expected to receive approximately \$210,000 in FY2020 in CAA section 103 grant funding to partially fund the Technical Services and Quality Assurance programs' personnel costs. As a result, the Technical Services and Quality Assurance program is assumed to be 20% section 103, 42% Title V, and 38% non-Title V.

ASSUMPTIONS

There is one position in the Technical Services program that was vacated due to promotion near the end of FY2018 as part of the Division's reorganization and was filled with a promotion of an individual from the Quality Assurance program in early FY2019. It is assumed that the Title V duties of the newly filled position are the same as the previously vacated position prior to reorganization. It is assumed that all activities are 42% Title V. The workload analysis indicates that 6.9 FTEs are necessary to carry out the work of this program (Title V and non-Title V). There are currently six positions within the program.

Table 13 – Technical Services Workload

⁷ There are also two existing sulfur dioxide monitors in the Kingsport area.

ACTIVITIES	ESTIMATED TITLE V HOURS/YR	ESTIMATED TITLE V FTE/YR
Air Monitoring	168	0.10
APC Data Management	693	0.43
AQS Data Loading/Reporting	42	0.03
CAM Maintenance, Calibration, Trouble Shooting	1722	1.07
Other Time, Administration, Personnel Activities, Office Work, Special Projects	420	0.26
Program Management	672	0.42
Quality Control	546	0.34
SOP and QAPP Development	210	0.13
Training – Received	210	0.13
TOTAL	4683	2.9

QUALITY ASSURANCE

In FY2018, a new Quality Assurance program was created to address recommendations and findings in the EPA June 13-17, 2016, Technical Systems Audit of the Division's ambient air monitoring operations. A portion of the former Technical Services program's operations was moved to the new Quality Assurance program to have staffing sufficient to create a program and an existing vacancy was reclassified and filled to provide management of the new program.

The principle force driving the creation of the new Quality Assurance program is to have an independent review of ambient air quality monitoring measurements and data reduction/reporting of those measurements prior to uploading the data to EPA's national ambient air database. This process is referred to as data validation. The program is also responsible for the coordination, and development, and review of Standard Operating Procedures (SOPs) for each type of ambient air monitor used, Quality Assurance Project Plans (QAPPs) and any other documents that may be necessary to ensure that quality procedures have been developed and are being followed by persons operating ambient air monitors in Tennessee for regulatory purposes. Having data that is trusted to be accurate is essential for accurate regulatory decision making and for the public to know, with assurance, the quality of the air they breathe.

In addition to developing quality assurance documents and making certain that they are followed, the staff of the Quality Assurance program periodically audit monitoring sites operated within Tennessee's State or Local Air Monitoring Stations (SLAMs) network and sites at industrial facilities. The purpose of these audits is to ensure that ambient data being collected for evaluating regulatory compliance meet quality standards. During these audits, staff members go to a monitor site to independently challenge the monitor with known, independent calibration standards to gauge the monitor's response and accuracy of measuring the pollutant being audited. Staff members also ensure that monitoring site designs and systems (sample inlet/probe lines, temperature, pressure, and flow rates) comply with regulatory requirements. If issues arise during these performance audits, Quality Assurance staff are responsible for coordinating a corrective action plan with the monitoring site operation personnel to minimize data loss.

The meteorology staff members in the former Technical Services program were transferred to the new Quality Assurance program and are continuing to do air quality forecasting. These staff members use meteorological parameters and current air quality conditions to predict future air quality. The forecast information is provided to the public so that informed decisions can be made to protect health and also to plan activities that lessen impact on air quality during high pollution days.

There are six positions in this program.

CALCULATION BASIS

See Technical Services program.

ASSUMPTIONS

There is one vacant position in the Quality Assurance program that was created due to promotion as part of the Division's reorganization. It is assumed that this position will remain vacant and the duties will be reallocated or reprioritized. Another position was vacated and the vacant position has been transferred to the enforcement program. It is assumed that all activities are 42% Title V.

Table 14 – Quality Assurance Workload

ACTIVITIES	ESTIMATED TITLE V HOURS/YR	ESTIMATED TITLE V FTE/YR
Air Monitoring	21	0.01
Air Quality Forecasting	945	0.59
AQS Data Validation	252	0.16
Field Auditing	630	0.39
Audit Preparation and Documentation	1050	0.65
Modeling	21	0.01
Other Time, Administration, Personnel Activities, Office Work, Special Projects	63	0.04
Program Management	676	0.42
SOP and QAPP Development	126	0.08
Training – Received	126	0.08
Emergency Response	8	0.01
eSIMs Troubleshooting/Maintenance/Tech Support	50	0.03
TSA Preparation	105	0.07
TOTAL	4073	2.5

SUMMARY OF ACTUAL AND PROJECTED FTEs BY FUNCTIONAL UNIT

The following table shows the projected FY2020 FTEs needed to complete all Title V activities as indicated in this workload analysis. In addition, the actual Title V FTEs for the current fiscal year (FY2019) and projected actual Title V FTEs for FY2020 are presented.

Functional Unit	FY2019 Actual FTEs⁸	FY2020 FTEs Needed	Planned FY2020 FTEs
Administrative Services	3.3	3.6	3.6
Director's Office	3.7	3.8	3.8
Small Business Assistance	2.0	2.0	2.0
Compliance Validation	5.3	5.3	5.3
Enforcement	2.7	2.8	2.3
Field Services	14.1	14.4	13.5
Permitting	11.7	15.8	12.2
Regulatory Development	1.9	2.3	1.9
Emissions Inventory and Special Projects	2.6	3.5	2.8
Technical Services	2.5	2.9	2.5
Quality Assurance	1.9	2.5	2.1
Total Title V FTEs	51.8	58.9	52.0

In FY2018, the Division began implementing a new financial accounting system that provided a more accurate measurement of Title V and non-Title V personnel time and costs. This is a significant change from past methods. As a result, FTE estimates for fiscal years prior to FY2018 are not comparable to estimates from previous years and are not included in this workload analysis.

⁸ Reflects actual personnel actions during FY2019 as of April 30, 2019.

TDEC GENERAL AND ADMINISTRATIVE EXPENSES

In addition to Title V eligible costs incurred directly by the Division, the Division is assessed charges by the BOE and TDEC for a number of support activities provided by the other areas of the Department to support the activities of the Division. Some of the Title V related support activities and the offices that provide them are listed below.

- Services of the Commissioner, Deputy Commissioners, Assistant Commissioner, and Senior Advisor of the Bureau of the Environment – management and organizational support
- Communications Office - media relations
- Office of External Affairs – outreach and communication to department stakeholders, including local government, other government agencies, the regulated community, public interest groups, and citizens; public meeting and hearing support
- People and Organizational Development Office – all personnel related services including human resources
- Office of General Counsel – rulemaking and SIP development support, enforcement activity, legislative services, administrative legal services, policy and guidance interpretation and development
- Office of Policy & Sustainable Practices – support with rule, SIP, and policy development that require in-depth research, comparison to other state or national programs, or coordination with other state agencies or entities
- Office of Talent Management – leadership and staff training and development
- Budget and Financial Planning Division – budget development and management as coordinated with the overall department budget
- Emergency Services Division – emergency response, risk and safety planning, vehicle services
- Division of Fiscal Services – fee collections and accounting
- Purchasing Division – procurement of all necessary equipment and supplies, including monitoring network assets and field and office supplies, equipment inventory and asset management, and property contracts
- Records, Space, and Facilities Division – records and facilities management
- Field Office administrative support staff – support APC Field Services, Compliance Validation, and Technical Services staff in seven field offices

G&A expenses are charged to the Division according to formulae based on the percentage of the Division's budget in proportion to that of other BOE division budgets and special reserve funds and the Division's headcount. The Division's G&A expenses are charged to Title V funds, non-Title V funds, and federal grant revenue.

Due to financial constraints, no G&A expenses are being charged to APC during fiscal year 2018-2019 (FY2019) or will be charged to APC during FY2020. This is a temporary relief of a line item until appropriate funding mechanisms can be developed and implemented.

TITLE V EXPENSE ESTIMATES

An important step in developing a Title V fee system is to estimate future expenses in order to determine if projected revenue, together with the available reserve balance, is sufficient to fund the Title V permitting program. As mentioned earlier, federal regulations preclude the use of non-Title V funds for funding Title V activities. Thus, a failure to collect sufficient funds through the Title V fee system would have significant ramifications on the efficacy of Tennessee's Title V Program and economic development within the state, and could eventually lead to federal intervention. Therefore, when designing a Title V fee system, the Division plans for a reserve at year-end to account for unexpected expenses and unanticipated reductions in fee revenue.

Historical and projected expenses are broken down into six categories: four personnel-related categories (regular salaries & wages, longevity & bonus, overtime, and benefits), Air Pollution Control (APC) General & Administrative (G&A) Expenses, and TDEC G&A Expenses. APC G&A expenses include expenses such as travel, rent and utility costs for ambient monitoring sites, shipping costs, maintenance and repair costs, third-party professional and administrative expenses, office supplies, field and laboratory supplies, equipment purchases, and charges from other state agencies for services such as telephone and computer services, office rent, liability insurance, and general accounting, purchasing, human resources, and legal services. TDEC G&A expenses are described earlier in this document.

Personnel costs: Personnel costs include salaries, benefits, longevity⁹ and bonus pay¹⁰, and overtime pay¹¹. Fiscal Year 2019 personnel expenses were determined by taking the individual salary rates at the end of Fiscal Year 2018 and revising specific salaries to account for promotions (part of the Division's reorganization effort that started in FY2018) and the filling two vacant positions that occurred during FY2019. FY2019 salaries also reflect a 3.5% pay-for-performance pay increases went into effect 1/1/2019. FY2020 personnel expenses were determined by taking current salaries and adjusting them by an estimated 3.5% pay-for-performance¹² that should occur in January, 2020. Benefit costs are approximately 45% of salary costs. Based on historical data, longevity and bonus payments are estimated as 4% of total salary. In addition to these costs, \$25,000 is added to each year's estimate to account for terminal leave.

APC General & Administrative (G&A) Expenses: Projections for FY2019 and FY2020 expenses are based on historical expenses and known and assumed changes from the previous year's expenses. Historical expenses from FY2015 through FY2018 were used in this analysis, as well as actual expenses for a portion of FY2019. Starting in FY2018, the Division implemented an improved accounting method for properly allocating Title V and non-Title V expenses. Actual data from using this new system shows that most of the Air Division's G&A (i.e., non-personnel costs) are 52% Title V/48% non-Title V. Thus, for most APC G&A expenses, the Division took the average cost for that category for the past four years, allocated 52% to Title V, and increased that figure by two percent per year to account for inflation. Methods for projecting future year expenses for equipment, new sulfur dioxide monitoring sites, and Professional Services by Other State Agencies are explained below.

Equipment - Equipment costs are primarily for the purchase of equipment for Tennessee's ambient monitoring network. The cost of the ambient monitoring program is a Title V eligible expense and, thus, a portion of the cost of purchasing new or replacement equipment should be funded using Title V fees. Where ambient monitors are located in order to monitor the air quality impact from specific Title V facilities, all of those costs should be covered by Title V fees. In the previous four years, equipment costs have varied from zero to \$471,307. Historically, ambient monitoring equipment was added or replaced based on need and funding availability. However, in 2017, the

⁹ Longevity pay is based on years of service once an employee has been in state service a certain number of years.

¹⁰ Bonus pay is a feature of the Tennessee TEAM Act's Pay-for-Performance system that awards employees for advanced and outstanding performance.

¹¹ No overtime pay has been awarded since FY2016.

¹² Historical pay-for performance increases for "valued" performance: FY2016 – 2.5%, FY2017 – 3.0%, FY2018 – 3.0%, FY2019 – 3.5%

Tennessee General Assembly approved a 1.55 million dollar appropriation to purchase 10 air quality monitoring shelters, replace aging and obsolete ambient air monitoring equipment, and upgrade network communications. Once this monitoring network improvement project is completed, the Division will develop and implement a plan to replace ambient monitoring equipment on a routine schedule, based on the expected life of the equipment, in order to properly maintain the monitoring network. This will necessitate setting aside funds in the Title V reserve account annually to implement the replacement plan. Therefore, we have included \$50,000 per year in projected Title V expenses to cover routine replacement of ambient monitoring costs in FY2020. Adjustments to the amount that needs to be set aside may change annually.

New Sulfur Dioxide Monitoring Sites - The Division installed two new sulfur dioxide monitoring sites in Kingsport, Tennessee, during fiscal year 2018-2019. The shelters and any new equipment needed for these new sites, covered by state appropriations. Ongoing operating costs of approximately \$5515/year will be paid using Title V funds.

Professional Services by Other State Agencies - This is the largest category of APC G&A expenses. In FY2020, this category of expenses is predicted to be approximately 1.2 million dollars (Title V and non-Title V). These expenses include items such as building rent, computer and telephone services and maintenance, insurance, and consolidated support services by other state agencies. For most of these, either FY2018 costs or the average of the past three years (FY2016 to FY2018) was used to estimate FY2020, depending on how expenses have trended. For others, expenses were increased based on historical trends.

TDEC General & Administrative (G&A) expenses: As indicated in the previous TDEC General and Administrative Expenses section, no G&A expenses will be charged to the Division in FY2019 or FY2020.

Table 15 – Historical and Projected Title V Expenses							
Expense Description	FY2014	FY2015	FY2016	FY2017	FY2018	projected FY2019	projected FY2020
Regular Salaries & Wages	\$3,014,392	\$2,645,562	\$2,722,076	\$2,449,638	\$3,241,514	\$3,363,935	\$3,492,617
Longevity & Bonus	\$188,400	\$192,200	\$178,800	\$205,545	\$136,267	\$134,557	\$138,105
Overtime	\$4324	\$2031	\$0	\$0	\$0	\$0	\$0
Benefits	\$1,281,379	\$1,153,670	\$1,145,871	\$1,092,142	\$1,494,311	\$1,513,771	\$1,560,428
APC General & Administrative Expenses	\$1,015,885	\$932,403	\$1,288,469	\$980,420	\$919,969	\$969,237	\$992,963
TDEC General & Administrative expenses	\$851,048	\$892,744	\$866,639	\$962,205	\$1,014,803	\$0 ¹³	\$0 ¹⁴
Grand Total	\$6,355,428	\$5,818,610	\$6,201,855	\$5,689,960	\$6,806,864	\$5,981,500	\$6,184,113

¹³ As indicated previously, no TDEC G&A expenses will be charged to the Division in FY2019 or FY2020

¹⁴ Ibid.

TITLE V FEE COLLECTION ESTIMATES

The Division has projected the amount of Title V fees that will be collected for FY2019 fees¹⁵ and FY2020 fees based on projected tonnage these periods and the fee system that will be in place in starting in FY2019. For facilities that determine fees based on actual or a mixture of actual and allowable emissions, projected tonnage was determined by starting with allowable and actual emissions as invoiced or reported for 2017-2018 fees on AEAR reports. Emissions for facilities which determine fees based on allowable emissions were determined using the 2019 invoiced amounts. Adjustments¹⁶ were made for two facilities (TVA Johnsonville and TVA Gallatin) to account for changes at those facilities that occurred near the end of 2017.

Title V reserve at beginning of FY2019¹⁷: \$1,419,663

Estimated Title V collections of FY2018 fees during FY2019: Each year, Title V fees are collected in order to fund Title V activities for the fiscal year that ends June 30th. In the past, the Title V fee deadline was July 1st each year. As a result, a significant portion of Title V fees was received after the fiscal year in which those funds were needed. For example, for FY2017, \$1,927,527 of the \$5,010,912 in Title V fees for 2017 (38%) was received after July 1st, 2017. In 2016, the Air Pollution Control Board adopted changes to the Title V rule to change the Title V fee deadline from July 1st of each year to April 1st except for sources which determined fees based on fiscal year actual emissions, for which 65% of the estimated fee was due April 1st with the remainder due July 1st¹⁸. As a result, approximately 97%, were received during FY2018¹⁹. The remaining amount of FY2018 fees were collected in fiscal year 2019: **\$194,048**.

Estimated Title V collections of FY2019 fees during FY2019: Projected FY2019 fees are estimated at \$5,799,331. As stated above, this is based on FY2018 AEAR data and FY2019 invoices and the fee system that was adopted by the Air Pollution Control Board in 2017. Similar to FY2018 fees, APC estimates that 97% of FY2019 fees will be collected in FY2019. $\$5,799,331 \times 0.97 = \mathbf{\$5,625,351}$

Estimated Expenses for FY2019: \$5,981,500

Reserve at end of fiscal year 2018-2019 = $\$1,419,663 + \$194,048 + \$5,625,351 - \$5,981,500 = \mathbf{\$1,257,562^{20}}$

Estimated Title V collections of 2018-2019 fees during fiscal year 2019-2020 = 3% of 2018-2019 fees, or $\$5,799,331 \times 0.03 = \mathbf{\$173,980}$

¹⁵ An estimate of 2018-2019 fee collections was included in the Title V workload analysis dated December 13, 2017. The figures contained in this workload analysis update these projections.

¹⁶ For TVA Johnsonville, APC used actual emissions for the first nine months of 2018, as reported to the Clean Air Markets Database, for the units that remained after retirement of the coal-fired units. For TVA Gallatin, the final control equipment was installed in 2017. Thus, APC used actual emissions for the first nine months of 2018, as reported to the Clean Air Markets Database. This data was then extrapolated to 12 months.

¹⁷ Includes \$424,388 that was received June 27-28, 2018 (FY2018) but not deposited until July 2, 2019 (FY2019). For the purpose of these calculations, this amount is assumed to have been collected during FY2018.

¹⁸ Ninety-day extensions are available both for facilities whose fees are based on calendar year actual emissions or calendar year actual emissions as long as an extension is requested and at least 65% of the estimated fee is paid by April 1st.

¹⁹ Includes payments received in FY2018 but deposited in FY2019.

²⁰ The amount of the projected Title V a reserve at end of FY2019 is different than was presented in the Title V Workload Analysis for Fiscal Years 2017-2018 and 2018-2019 dated December 13, 2017, due to temporary relief of TDEC G&A over for FY2019.

Estimated Title V collections of FY2020 fees during fiscal year FY2020: Since there will be no changes to the fee system for FY2020 and the Division is unaware of any significant changes in emissions from Title V facilities that will affect FY2020 fees, the Division has estimated that FY2020 fee collections will be the same as FY2019 fee collections: \$5,799,331. Emission and fee calculations are shown on the following page. As with 2018-2019 fees, the Division estimates that 97% of these fees will be collected during the fiscal year. $\$5,799,331 \times 0.97 = \mathbf{\$5,625,351}$

Estimated Expenses for FY2020 (see earlier): \$6,137,363

Reserve at end of fiscal year 2019-2020 = \$1,257,562 + \$173,980 + \$5,625,351 - \$6,137,363 = \$919,530²¹

²¹ The Title V program is assuming a reserve at end of FY2020 primarily due to temporary relief of G&A over a two-year period (FY2019 and FY2020).

Air Pollution Control
Projected Title V Fees

July 1, 2019– June 30, 2020

Non-EGU Estimated Fees

70,769 Allowable	X	\$33.50/Ton	\$2,370,758
19,486 Actual	X	\$53.50/Ton	\$1,042,510
Base Fee for 142 Sources ²²	X	\$4000	\$568,000
57 Sources @ Minimum Fee ²³	X	\$7500	+\$427,500
Total	=		\$4,408,768

EGU Estimated Fees

4323 Allowable	X	\$75.00/Ton	\$203,186
15,352 Actual	X	\$47.00/Ton	\$1,151,378
Base Fee for 9 Sources ²⁴	X	\$4000	\$36,000
0 Sources @ Minimum Fee ²⁵	X	\$7500	+\$0
Total	=		\$1,390,563

²² Estimate does not include facilities paying the minimum fee.

²³ Estimate includes facilities paying the \$4000 base fee as part of the minimum fee.

²⁴ Estimate does not include facilities paying the minimum fee.

²⁵ Estimate includes facilities paying the \$4000 base fee as part of the minimum fee.

SUMMARY OF COST SAVING INITIATIVES

Near-Term Initiatives

Director's Office: During Fiscal Year 2018, the Division created and filled a Business Administrator position. This position has already resulted in significant improvements in the Division's financial operations, including regular review of expenses to ensure accuracy and proper funding. Additional long-term savings should be realized as the tasks assigned to this position are matured and fully implemented.

Compliance Validation: One position was recently vacated due to promotion. The Division will make necessary changes within this area to ensure proper management and critical workload completion, but one position within the area will remain vacant and duties will be reassigned accordingly.

Enforcement: One position was recently vacated due to retirement. The Division intends to keep this position vacant and reassign duties to existing staff. The impacts of a second (recent) vacancy on program workload have yet to be determined, but the Division does not anticipate filling the position in the near-term (FY2020).

Field Services: The Division intends to keep at least two positions vacant and reassign duties to existing staff.

Permitting: The Division has delayed hiring for four entry-level positions until appropriate funding mechanisms can be developed and implemented. There are four additional permitting positions that will remain vacant. While some of these positions have been vacant for a year or longer, three of them became vacant due to recent retirement or departure from state government.

Emissions Inventory and Regulatory Development: There is one position in the Emissions Inventory and Special Projects program that was vacated due to departure from state government in 2017. A photochemical modeling position in the Emissions Inventory and Special Projects Program that does work in conjunction with the regulatory development program was recently vacated due to promotion. A third position within the Regulatory Development program was recently vacated due to retirement. A fourth position that was responsible for fee collections and management was vacated due to transfer within the Division. It is the Division's intention to combine the responsibilities of these four vacant positions into a two positions (one in the Emissions Inventory Program and one in the Regulatory Development Program). The Division intends to fill one position in the Emissions Inventory Program in FY2020, but the position in the Regulatory Development Program will remain vacant until appropriate funding mechanisms can be developed and implemented.

Quality Assurance Program: There is currently one vacant position in this program. The Division will make necessary changes within this area to ensure critical workload completion and the position will remain vacant and duties will be reassigned accordingly.

Division-Wide: The Division has initiated significant reductions in staff travel not related to critical work functions.

Long-Term Initiatives

Field Services: During Fiscal Year 2018, personnel from three field offices participated in an alternative work solution (AWS) pilot program. AWS is a program in which staff members are based out of an alternative location, generally their homes, in lieu of traditional offices. Preliminary results from this pilot project show an increase in Field Services staff productivity. Based on the success of the AWS pilot program, the Division has expanded AWS to make it available to Division staff in all six field offices. In addition to potential increases in productivity, real estate cost savings should be realized when leases expire or are renegotiated. The amount of savings or when they may occur is unknown at this time.

Permitting: There are several long-term cost saving initiatives that have either begun implementation or should be implemented prior to Fiscal Year 2019.

- **Reorganization to Sector-Based Permitting:** The permitting program initiated sector-based permitting with transition of one of the four permitting sections to a “sector-based” permitting section during FY2018. The remainder three permitting sections were reorganized into sector-based permitting sections starting January 1, 2019. Each permitting section is assigned state-wide responsibility of several industrial sectors and includes a technical lead²⁶ responsible for the quality and consistency of all of the permits issued by their section. This type of organization should result in improved efficiency of the permitting program.
- **Permitting Alternatives:** In 2017, the Air Pollution Control Board adopted rules to allow the Division to implement alternatives to standard construction and operating permits. This includes general permits, permits-by-rule, and combined construction and operating permits. The Division has initiated general permits and permits-by-rule for a small number of source categories²⁷ and will add categories over time. The Division has initiated a pilot program for combined construction and operating permits.
- **Electronic Public Notices:** The Division currently publishes public notices upon receipt of all complete construction permit applications in a newspaper of general circulation in the area in which the proposed new or modified source is located. The cost of these notices run from approximately \$300 to \$800 each and the Division issues an average of 110 notices each year. Publication of 110 notices per year at an average of \$500 each amounts to \$55,000 per year. The Division has begun the rulemaking process to allow for publication of public notices on its website. Should this rule change become effective and electronic public notices utilized in lieu of newspaper notices, these costs will no longer be necessary. Approximately one-third of all construction permit applications are for new or modified sources at Title V facilities.

Emissions Inventory and Fees: The Emissions Inventory and Special Projects program has developed an online portal, known as SLEIS, for submitting emissions inventories. Pilot testing of SLEIS is ongoing and is scheduled to be fully implemented in FY2020. In addition, a portal will be added to SLEIS to allow submittal of annual Title V Actual Emissions Analysis Reports (AEARs). Pilot testing of the AEAR portal is planned for calendar year 2020. Implementation of SLEIS for emissions inventories and AEARs should result in efficiency improvements for both the Division and the regulated community.

²⁶ The technical lead for one of the permitting sections is currently vacant and is expected to be filled in FY2020.

²⁷ General permits have been developed for dry cleaners and permits-by-rule have been developed for gasoline dispensing facilities, emergency engines, and auto body paint shops.

Table 16 – Historical Title V Collections and Expenses

Fiscal Year	Fees	Interest and penalties	Transfer In	Expenditures	Balance
2002-2003					\$1,387,223.12
2003-2004	\$5,780,573.30	\$17,261.10		\$5,299,426.96	\$1,885,630.56
2004-2005	\$5,773,095.32	\$33,124.15		\$6,289,281.06	\$1,402,568.97
2005-2006	\$6,806,903.33	\$62,547.16		\$6,604,384.65	\$1,667,634.81
2006-2007	\$6,170,217.54	\$67,707.22		\$6,993,064.19	\$912,495.38
2007-2008	\$7,116,004.10	\$35,456.47		\$7,254,796.79	\$809,159.16
2008-2009	\$7,939,773.17	\$21,518.17		\$6,613,669.61	\$2,156,780.89
2009-2010	\$7,587,853.93	\$9317.34		\$6,415,182.16	\$3,338,770.00
2010-2011	\$5,800,630.50	\$5527.40		\$7,261,266.44	\$1,883,661.46
2011-2012	\$6,336,163.20	\$1636.87		\$7,463,530.81	\$757,930.72
2012-2013	\$6,891,980.16	\$1113.83		\$6,844,668.87	\$806,355.84
2013-2014	\$6,844,856.89	\$9484.30		\$6,543,335.07	\$1,117,361.96
2014-2015	\$7,040,610.80	\$1129.83		\$6,694,005.01	\$1,465,097.58
2015-2016	\$5,321,521.83	\$2108.31	\$1,919,777.74 ²⁸	\$6,094,831.92	\$2,613,673.54
2016-2017	\$4,617,895.15	\$9697.10		\$5,687,186.70	\$1,377,827.25
2017-2018	\$6,303,601.88	\$896.29		\$6,740,536	\$1,419,663

²⁸ During fiscal year 2015-2016, the Division determined that \$1,919,777.74 in non-Title V expenses had been charged to Title V fees over a several year period. This was corrected at the end of fiscal year 2015-2016, resulting in an increased Title V fee balance at the beginning of fiscal year 2016-2017.

Table 17 - Historical Tonnage Projections & Collections and Historical Fees

Fiscal Year	Number Companies	\$/Ton Allowable Emissions	\$/Ton Actual Emissions	Minimum /Base Fee*	Projected Total Tons	Total Tons Collected	Projected Allowable Tons	Allowable Tons Collected	Projected Actual Tons	Actual Tons Collected	Projected Companies Paying Min./Base	Companies Actually Paying Min./Base	\$ Amount Billed	\$ Amount Collected
17-18 non-EGU	201	32.50	\$43.00	\$7500	78,116	86,627	58,114	63,343	20,002	19,284	109	107	\$3,787,675.97	\$3,780,175.97
17-18 EGU	9	39.00	\$49.50	\$7500	27,994	26,737	16,642	12,323	11,352	14,414	2	1	1,201,499.94	1,201,499.94
16-17 non-EGU	205	\$32.50	\$43.00	\$7500	83,580	108,057	65,071	76,008	18,509	21,292	108	98	\$4,083,515.65	\$3,916,319.73
16-17 EGU	9	\$39.00	\$49.50	\$7500	27,994	28,235	16,642	16,532	11,352	11,719	2	0	\$1,224,857.24	\$1,224,857.24
15-16 non-EGU	205	\$32.50	\$43.00	\$7500	124,500	100,365	104,000	81,260	20,500	19,105	105	97	\$4,215,224.16	\$4,059,712.98
15-16 EGU	11	\$39.00	\$49.50	\$7500	43,000	41,259	39,500	36,603	3500	4656	3	4	\$1,691,011.45	\$1,691,011.45
14-15 non-EGU	205	\$28.50	\$39.00	\$7500	119,500	114,977	102,000	99,567	17,500	15,410	201	200 (83 only paid base)	\$4,739,853.72	\$4,692,656.26
14-15 EGU	10	\$45.50	\$56.00	\$7500	48,000	49,781	46,000	47,616	2000	2165	10	10 (1 only paid base)	\$2,362,785.29	\$2,362,785.29
*13-14 non-EGU	201	\$28.50	\$39.00	\$7500	118,000	121,396	101,000	103,650	17,000	17,746	201	200	\$4,712,238.32	\$4,646,138.70
*13-14 EGU	10	\$45.50	\$56.00	\$7500	57,000	48,802	55,000	46,648	2000	2154	10	10	\$2,318,133.81	\$2,318,133.81
12-13 non-EGU	211	\$29.50	\$40.00	\$7500	184,000	125,576	160,000	105,256	24,000	20,320	105	102	\$4,403,500	\$4,096,563.73
12-13 EGU	9	\$45.50	\$56.00	\$7500	65,000	60,425	62,500	58,110	2500	2315	3	3	\$2,795,416.43	\$2,795,416.43
11-12	214	\$28.50	\$39.00	\$7500	200,000	190,232	175,000	165,782	25,000	24,450	105	108	\$5,973,274.94	\$6,167,959.21
10-11	220	\$24.50	\$35.00	\$6500	210,000	204,961	190,000	179,953	20,000	25,008	110	106	\$5,682,497	5,800,630.50
09-10	221	\$28.50	\$39.00	\$7500	217,064	211,344.7	195,801	191,346	21,263	19,999	105	111	\$7,298,632.70	\$7,587,853.93
08-09	239	\$28.50	\$39.00	\$7500	217,064	232,996	195,801	206,725.8	21,263	26,271	115	110	\$7,835,606.93	\$7,939,773.17
07-08	243	\$26.50	\$37.00	\$7500	230,489	234,615.4	213,772	207,541.6	16,717	27,073.8	88	119	\$7,394,083.80	\$7,317,445.36
06-07	244	\$22.50	\$33.00	\$5000	257,989	236,936.8	238,232	214,385.8	19,757	22,551	100	96	\$6,093,539.15	\$6,095,634.93
05-06	250	\$21.50	\$32.00	\$4500	284,639	259,420	256,578	232,764	28,061	26,656	100	92	\$5,976,181.77	\$6,000,240.56
04-05	264	\$19.50	\$30.00	\$3500	324,896	290,030.7	294,836	262,405.1	30,050	27,625.6	80	80	\$5,869,607.39	\$5,874,970.52
03-04	267	\$19.50	\$30.00	\$2500	330,731	287,381.9	309,213	258,052.4	21,519	29,329.5	72	56	\$6,024,377.47	\$6,032,675.99
02-03		\$17.50	\$28.00		321,279								\$	\$
01-02		\$13.00	\$21.70		382,476								\$	\$

*For FY 2013-2014, the Division replaced the minimum fee of \$7500 with a base fee of \$7500. All sources with total allowable emissions (excluding CO) of 250 TPY or less paid only the base fee. All sources with total allowable emissions (excluding CO) greater than 250 TPY paid the base fee plus their total tonnage (excluding CO) times the applicable \$/ton value (actual, allowable, or mixed basis). This is also the case for 2014-2015. In 2015-2016, the base fee was replaced with the minimum fee.

Table 18 - Historical Federal Presumptive Minimum and Part 71 Fees

Presumptive Minimum		Part 71	
Effective	Fee Rate	Effective	Fee Rate
Sept 1989 – Aug 1990	\$ 25.00		
Sept 1990 – Aug 1991	\$ 26.21		
Sept 1991 – Aug 1992	\$ 27.59		
Sept 1992 – Aug 1993	\$ 28.43		
Sept 1993 – Aug 1994	\$ 29.30		
Sept 1994 – Aug 1995	\$ 30.07		
Sept 1995 – Aug 1996	\$ 30.93	Calendar Year 1996	\$ 32.00
Sept 1996 – Aug 1997	\$ 31.78	Calendar Year 1997	\$ 32.88
Sept 1997 – Aug 1998	\$ 32.65	Calendar Year 1998	\$ 33.78
Sept 1998 – Aug 1999	\$ 33.21	Calendar Year 1999	\$ 34.35
Sept 1999 – Aug 2000	\$ 33.82	Calendar Year 2000	\$ 34.98
Sept 2000 – Aug 2001	\$ 34.87	Calendar Year 2001	\$ 36.07
Sept 2001 – Aug 2002	\$ 36.03	Calendar Year 2002	\$ 37.27
Sept 2002 – Aug 2003	\$ 36.60	Calendar Year 2003	\$ 37.86
Sept 2003 – Aug 2004	\$ 37.43	Calendar Year 2004	\$ 38.72
Sept 2004 – Aug 2005	\$ 38.29	Calendar Year 2005	\$ 39.61
Sept 2005 – Aug 2006	\$ 39.48	Calendar Year 2006	\$ 40.84
Sept 2006 – Aug 2007	\$ 41.02	Calendar Year 2007	\$ 42.43
Sept 2007 – Aug 2008	\$ 41.96	Calendar Year 2008	\$ 43.40
Sept 2008 – Aug 2009	\$ 43.75	Calendar Year 2009	\$ 45.25
Sept 2009 – Aug 2010	\$ 43.83	Calendar Year 2010	\$ 45.33
Sept 2010 – Aug 2011	\$ 44.48	Calendar Year 2011	\$ 46.00
Sept 2011 – Aug 2012	\$ 45.55	Calendar Year 2012	\$ 47.11
Sept 2012 – Aug 2013	\$ 46.73	Calendar Year 2013	\$ 48.33
Sept 2013 – Aug 2014	\$ 47.52	Calendar Year 2014	\$ 49.15
Sept 2014 – Aug 2015	\$ 48.27	Calendar Year 2015	\$ 49.93
Sept 2015 – Aug 2016	\$ 48.49	Calendar Year 2016	\$ 50.16
Sept 2016 – Aug 2017	\$ 48.88	Calendar Year 2017	\$ 50.56
Sept 2017 – Aug 2018	\$ 49.85	Calendar Year 2018	\$ 51.56
Sept 2018- Aug-2019	\$ 51.06	Calendar Year 2019	\$ 52.81