

## QUESTIONS TO CONSIDER BEFORE PASSING NEW AIR FEES

1. What is the projected ending balance of the Title V program and Air Contaminant Discharge (ACDP) programs?
2. How many open positions in the Title V and ACDP programs during the 2015-2017 biennium?
3. What was the average number of FTE in both the TV and ACDP program during the 2015-2017 biennium?
4. How many FTE moved to work on the Air Toxics program from both the Title V and ACDP programs?
  - a. If any FTE moved positions were their positions backfilled with new hires or were the program working with a deficit of filled positions?
5. WHEN will the positions be hired and will any program positions be held open?

### **Current Fee and Budget Summary for Title V and ACDP**

#### **Oregon DEQ Air Permitting Programs Projected -- Before Fee Changes**

Title V Program 2017-2019	\$7.77 million with 113 facilities
ACDP Program 2017-2019	\$7.2 million
Total Projected Air Program Fees	\$14,970,000

#### **Air Quality Fee Requests in Governor Brown's Recommended Budget (GRB)**

Air Toxics GF for equipment:	\$2.5 General Fund (not fees)
Air Toxics fee revenue	\$2,710,200
ACDP position restoration fee:	\$1,572,000
Air nuisance work (2 FTE)	\$530,000
Total new fee requests:	\$4,813,000

### **TITLE V AIR OPERATING PERMIT FEES**

(2017-19 EQC adopted rule with these figures on Jan. 18, 2017)

2015-2017 total revenue: \$7,804,000 for 109 sources

2017-2019 total projected revenue: \$7,772,000 for 113 sources

#### 2017 Fee Structure (Before any fee increases)

Emission Fee:	\$60.56
Annual Base Fee:	\$8,010
Amendment:	\$488

Simple Mod: \$1,953  
Moderate Mod: \$14,653  
Complex Mod: \$29,306  
Air Monitoring Review: \$3,907

### AIR CONTAMINANT DISCHARGE PERMIT (ACDP) FEES

#### Number of Oregon ACDP Permits

<i>Standard ACDP</i>	133	Fee \$9,216
<i>Simple ACDP</i>	147	Fee \$2,304
<i>General ACDP (6)</i>	2083	Fee \$144 - \$2,246
<i>Basic ACDP</i>	104	Fee \$432
<i>Total ACDP Permits</i>	2576	



# Oregon

Kate Brown, Governor

Department of Environmental Quality

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February 29, 2016

Northwest Pulp & Paper Association  
212 Union Avenue SE, Suite 103  
Olympia, WA 98501-1302

Attn: Kathryn VanNatta, Director of Government and Regulatory Affairs

Re: DEQ response to NWPPA comments and questions to OAR 340, Division 220 - Title V Air Operating Permit Fees and Greenhouse Gas Reporting Fees

Dear Ms. VanNatta,

Thank you for your February 22, 2016 letter sent via the ODEQ rulemaking website. Below are the responses to each of your questions.

1. The Title V program has 35 FTE with a spending limitation of \$9.3 million.
2. The Title V program has remained at 35 FTE for the past two biennia.
3. The Title V program has approximately 115 facilities with Title V permits.
4. The GHG Reporting program has 2 FTE with spending limitation of \$647,000.
5. The job titles of the GHG Reporting personnel are Natural Resource Specialist 2 and Natural Resource Specialist 3.
6. In the last couple of years, in addition to maintaining the GHG emissions inventory, the GHG Reporting program updated the administrative rules and made enhancements to the on-line reporting tool to make it easier for sources to report their GHG emissions.
7. There is currently one open position in the GHG Reporting program and that position is in recruitment. There are six vacant positions in the Title V program in various stages of recruitment.
8. The increased resources from the proposed fee increases will not fund additional staff. They will help to support increased salary and benefit costs for existing staff.

Thank you for your interest and review of DEQ's proposal. I can be contacted at 503-693-5772 if you have any more questions.

Sincerely,

Susan Carlson  
Title V Invoice Specialist  
Oregon Department of Environmental Quality  
Air Program Operations

**Subject:** RE: Proposed ACDP Fee Increases - Fiscal Advisory Committee  
**Date:** Wednesday, March 22, 2017 at 12:40:49 PM Pacific Daylight Time  
**From:** EBERSOLE Gerald  
**To:** VAN NATTA Kathryn

Thank you, I will add you to the committee.

**From:** VAN NATTA Kathryn  
**Sent:** Wednesday, March 22, 2017 10:56 AM  
**To:** EBERSOLE Gerald <gerald.ebersole@state.or.us>  
**Cc:** sharla@preservedwood.org; Heath Curtiss <heath@ofic.com>; FREESE Mike <mikefreese@aoi.org>; Chris McCabe <chris@nwpulpanpaper.org>  
**Subject:** Re: Proposed ACDP Fee Increases - Fiscal Advisory Committee

NWPPA absolutely wants to participate in the Fiscal Advisory Committee. Our members pay ACDP fees. We can participate in both April meetings.

Please put me on your Committee list on behalf of NWPPA.

Kathryn VanNatta  
NWPPA  
C: 503-805-8511  
O: 503-844-9540

On Mar 22, 2017, at 9:31 AM, EBERSOLE Gerald <[gerald.ebersole@state.or.us](mailto:gerald.ebersole@state.or.us)> wrote:

Hi all, the 2017 Oregon Legislature has been asked to approve Policy Package 110. The Policy Package would help restore 3.97 positions to the air contaminant discharge permit program based on a 22 percent increase to existing air contaminant discharge permit fees.

DEQ has commenced a rulemaking to implement the 22 percent increase, if it is authorized by the legislature. To achieve 22 percent, the proposed rules would increase existing fees by 14.5 percent and create new fees for certain construction applications, permit renewal applications, and source test reviews. The new fees are projected to be equivalent to increasing existing air contaminant discharge permit fees across the board by 7.5 percent.

When DEQ adopted the last increase to the air contaminant discharge permit fees in 2013, the 20 percent increase was expected to sustain the program through 2017.

This current rulemaking is expected to restore adequate funding for operating Oregon's air contaminant discharge permit program and would help DEQ provide the requisite permit program service through 2021.

DEQ has determined that a Rulemaking Advisory Committee is required for this rulemaking and is sending you this email to determine if you are interested in participating on the committee. We are currently anticipating two three hour meetings on April 17 and April 20. Please let us know either way by Thursday (Mar. 23).

If you have any questions please contact myself or Don Hendrix at (503) 229-5108.

Thank you for your consideration.

The commitment of your time and expertise to evaluate the impacts of the fee increases on businesses would be greatly appreciated.

Jerry Ebersole  
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Air Program Operations Section  
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