

**Summary of States' Responses to Air Quality Permitting Fees Survey (2014)
Plus - Stakeholder Recommendations for Future Funding of the Air Quality Program in Iowa**
(States listed below include states that responded to the survey, are in the geographic region near Iowa, or that have similar GDP or population to Iowa)

Iowa Project Definition	Project Type: Examples of common permitting projects	Iowa Stakeholder Recommendation ¹	Alabama	Arkansas	Colorado	Delaware	Illinois	Kansas	Minnesota	Missouri	Nebraska	New Mexico	South Dakota	West Virginia	Wisconsin	Project Cost ³ (Includes all permits)		Permit Cost ³ (Each permit)	
																Average Project cost	Average ⁴ excluding SD & WI	Average per Permit cost	Average ⁴ excluding SD & WI
Registration permit	a. A registration permit ² with little or no review (e.g., registrations, permits by rule, templates).	To be determined	\$1,000	\$200	\$700	\$0	\$235	\$0	\$570	\$700	\$250 - \$1,500	\$500	\$125	\$250 - \$500	\$400	\$516	\$573	\$516	\$573
Standard Project	b. A new facility not subject to Title V or PSD, with three emission points.	\$1,020	\$7,055	\$22.97 per ton of permitted emissions	\$152.90 + \$76.45/hr	\$1,140	\$1,500 - \$11,000	\$0	\$14,250 minimum	\$100 + \$50/hr (typically <\$1,000)	\$250 - \$1,500	\$6,502	\$125	\$1,000	\$11,400	\$5,400	\$5,296	\$1,800	\$1,765
Complex Project	c. A new facility not subject to Title V, or PSD; with three emission points involving one NSPS and one NESHAP determination.	\$1,020	\$11,715	\$22.97 per ton of permitted emissions	\$152.90 + \$76.45/hr	\$1,140	\$1,500 - \$11,000	\$100 + .05% of capital cost	\$19,950	\$100 + \$50/hr (typically <\$2,000)	\$250 - \$1,500	\$11,670	\$125	\$4,500	\$12,400	\$7,625	\$8,014	\$2,540	\$2,671
Complex Project	d. An existing facility subject to Title V and PSD with three new emission points that require limits on three pollutants to avoid Title V and/or PSD (synthetic minor).	\$5,700	\$7,110	\$22.97 per ton of permitted emissions	\$152.90 + \$76.45/hr	\$1,140	\$6,000 - \$10,000	\$1,500 + .05% of capital costs	\$12,825	\$100 + \$50/hr (typically <\$2,000)	\$1,500	\$1,945	\$125	\$1,000	\$19,400	\$5,894	\$4,789	\$1,960	\$1,596
Prevention of Significant Deterioration	e. A PSD facility that is PSD major for three pollutants involving three emission points all subject to an NSPS and one subject to a NESHAP.	\$6,300	\$24,060	\$22.97/ton permitted emissions	\$152.90 + \$76.45/hr	\$1,020	\$12,000 - \$16,000	\$1,500 + .05% of capital costs (\$4,000 max)	\$12,285 - \$29,925	\$100 + \$50/hr (\$20,000-\$40,000)	\$3,000	\$40,735	\$125	\$7,500	\$44,400	\$17,327	\$15,917	\$5,780	\$5,306
Prevention of Significant Deterioration (PSD)	f. New Electric Generating Unit (EGU)	\$25,200	\$20,480	\$22.97/ton of permitted emissions	\$152.90 + \$76.45/hr	\$1,455	\$12,000 - \$16,000	\$1,500 + .05% of capital cost (\$4,000 max.)	\$29,925	\$100 + \$50/hr: \$100,000+	\$3,000	\$40,735	\$125	\$13,500	\$64,000	\$20,802	\$17,585	\$6,930	\$5,862
Annual Fee or other fee	g. Annual or Periodic Fees; Emission Fees (not Title V emissions fee)	\$22,000 application fee every five years for Title V sources		\$22.97/ton of permitted emissions	\$22.90/ton criteria pollutants \$152.90/ ton for HAPs	\$5,000 - \$243,000 for time spent on the facility's projects	\$235 - \$4,112 for non-Title V facilities		\$25-\$140 (small sources \$85/ton)	Annual flat fee of \$300-400 for asphalt & rock crushers			\$125-\$1,250	\$200 - \$10,000	\$400-\$4,100 for non-Title V: \$960-\$46,980 for Title V	-	-	-	-
Title V Permit	h. Annual Title V Emissions Fee Fee basis: For each facility based on the first 4,000 tons of each pollutant actually emitted - unless otherwise noted. (See permitted emissions term).	\$56/ton	\$37/ton	\$22.97/ton of permitted emissions	\$22.90/ton criteria pollutants \$152.90/ ton for HAPs	\$2,000 - \$175,000 based on ranges of total emissions	\$21.50/ton of permitted emissions \$294,000 max	\$37/ton	\$85.17/ton	\$40/ton facility maximum of 12,000 tons	\$67/ton	\$29.30/ton of permitted emissions \$186.25/ton HAPs	\$7.50/ton \$40/ton ethanol facilities, annual admin fee	\$32.41/ton (with minimum fees)	\$35.71/ton on first 5,000 tons of each pollutant	-	-	-	-
Asbestos Notification Fee	i. Fee for Asbestos NESHAP notifications, inspections	\$33-\$100	\$0	\$75-\$750	\$50-\$80	\$0	\$150	\$0	\$35 + 1% of project cost	\$100	\$200	\$0	\$0	\$0	\$100-\$1,350	\$275	\$185		

Notations:

1: The Iowa Stakeholder Recommendation numbers are derived from the budgeted levels in the Stakeholder recommendations report. The Stakeholders did not set specific fees, but requested that advisory groups be established to annually review and set fees. The Iowa Stakeholder Recommendation is not included in averages across states. These fee levels assume a \$2Million General Fund appropriation annually. See chart at right for detailed break out of recommendations and calculated fees based on those recommendations.

2: The average for registration permits includes all States except Delaware and Kansas which do not have a fee.

3: States with fees that include hourly rates, project cost factors, or other non-standard forms are not included in averages. Some information was provided in a range of costs. The average amount of the range was used to calculate cross state averages.

4: South Dakota and Wisconsin are excluded from these averages (as lowest and highest fees) in addition to those left out because of footnote 3 above.

Terminology:

Standard Project: On average contains a request for permits for 3 smoke stacks or vents.

Complex Project: Contains a request for permits for 3 or more smoke stacks and involves more complex regulatory analysis and determinations.

NESHAP: National Emissions Standard for Hazardous Air Pollutants - for specific hazardous air pollutants and types of industrial facilities.

NSPS: New Source Performance Standard - for specific pollutants and types of industrial facilities.

Title V: Clean Air Act Title V (5) requirement for facilities that emit larger amounts of air pollution to obtain Operating Permits. Facilities are called "Title V Facilities" or "Major Sources" of air pollution.

Small Sources: Facilities that emit air pollution in quantities less than Title V thresholds.

PSD: Prevention of Significant Deterioration pre-construction permitting program for very large facilities or projects at those facilities.

HAPS: Hazardous air pollutants (187 regulated).

Permitted emissions: The level of emissions allowed in permits. Actual emissions are often only a fraction of permitted emissions due to operating schedules (eg. operating 8 hrs/day vs 24 hrs/day).

Air Quality Program Stakeholder Funding Recommendations*

Supplemental Fees	FY16	FY17 Target Funds	Number of Actions	Cost per Action*
Asbestos Notification**	\$0	\$130,000	4,000	\$33
Title V Permit Application***	\$0	\$1,201,600	55	\$22,000
Major Source Construction Permit Application	\$0	\$1,073,100	568	\$1,900
Major Source PSD/Nonattainment Application	\$0	\$345,500	162	\$2,100
Minor Source Construction Permit Application	\$0	\$231,000	686	\$340
Total Supplemental Fees	\$0	\$2,981,200		

* Costs per action: An action is a notification receipt, or permit. This is a calculated field and not specifically recommended by the Work Group. Major Source and Minor Source Advisory Committees may set alternate fee structures to include separate fees for dispersion modeling services, which would reduce the per action cost.

** Asbestos contractors have indicated and interest in charging a fee 3 times this level to increase state staffing from 1 to 3 positions.

*** Includes stakeholder recommendation to increase staffing by 1 position to address backlog of permit applications.