

FUNDING OF MAJOR AIR FACILITY TITLE V PROGRAMS

Summary of NACAA 2014 Survey Data



FINAL REPORT, December 2015



Prepared for NACAA by Amec Foster Wheeler Environment & Infrastructure, Inc., NJDEP’s Air Program Consultants

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Introduction and Highlights

In November 2014, NACAA conducted a survey of state and local air pollution control agencies to examine how agencies are handling fees for regulating major air facilities, as required by Title V of the Clean Air Act. This document, prepared for NACAA by Amec Foster Wheeler (NJDEP’s air program consultants) provides an overview of the survey results.

TITLE V PROGRAMS

31 state and 19 local air pollution control agencies participated in the survey.*

Collectively, these agencies regulated 6,880 Title V facilities.

Total program cost of regulating those 6,880 facilities was \$186 million.

**Not all agencies responded to all survey questions, hence the number of agencies reporting (when <50) is indicated in each category.*

PROGRAM RESOURCES

54% of agencies had Title V fees that covered 100% or more of the program cost.

Average number of Title V facilities assigned per staff: 3.8 (lowest 1.4, highest 13.8).

67% of agencies (30 out of 45 reporting) had sufficient staffing for their Title V program.

33% of agencies (15 out of 45 reporting) had insufficient staffing for their Title V program.

PROGRAM BACKLOGS

73% of agencies reported permit review backlogs. Of those with backlogs:

100% had renewal backlogs

70% had modification backlogs

Survey Results by US Regions

		Title V Facilities	Program Cost \$Million	Program Revenue \$Million	Average Cost of Regulating Title V Facility	Average Fee Paid by Title V Facility	Program Cost Covered by Revenue	Staff: Full Time Equivalent (FTE)	Title V Facilities/FTE
					\$	\$	%		
WEST									
1	Alaska	150	3.50	2.80	\$ 23,333	\$ 18,667	80%	40	3.8
2	Arizona-Maricopa	31	1.30	1.33	\$ 41,935	\$ 42,903	102%	19	1.6
3	Arizona-Pima County	15	0.38	0.32	\$ 25,019	\$ 21,133	84%	3	5.0
4	California-Bay Area	95	4.50	3.50	\$ 47,368	\$ 36,842	78%	10	9.5
5	California-Sacramento	16	0.18	0.10	\$ 11,171	\$ 5,966	53%	1	16.0
6	Colorado	215	3.12	4.03	\$ 14,512	\$ 18,759	129%	27	8.0
7	Hawaii	149	2.50	2.70	\$ 16,779	\$ 18,121	108%	35	4.3
8	Idaho	48	1.49	1.63	\$ 31,042	\$ 33,958	109%	15	3.3
9	Montana	65	2.55	2.43	\$ 39,231	\$ 37,308	95%	25	2.6
10	Nevada-Washoe County	2	0.03	0.00	\$ 13,000	\$ -	0%	8	0.3
11	New Mexico	158	4.50	5.00	\$ 28,481	\$ 31,646	111%	52	3.0
12	Oregon	114	5.00	4.00	\$ 43,860	\$ 35,088	80%	35	3.3
13	Oregon-Springfield	19	0.51	0.55	\$ 26,920	\$ 29,205	108%	4	5.1
14	Utah	93	3.75	3.75	\$ 40,323	\$ 40,323	100%	29	3.2
15	Washington State	27	1.44	1.29	\$ 53,428	\$ 47,953	90%	11	2.5
16	Washington-Olympic	13	0.36	0.33	\$ 27,425	\$ 25,240	92%	3	4.8
17	Washington-Puget Sound	31	1.50	1.50	\$ 48,387	\$ 48,290	100%	-	-
18	Washington-Spokane	9	0.20	0.20	\$ 22,222	\$ 22,222	100%	1.5	6.0
19	Washington-Yakima	4	0.12	0.12	\$ 30,787	\$ 30,787	100%	1.5	2.7
20	Wyoming	142	4.46	4.33	\$ 31,408	\$ 30,498	97%	29	4.9
21	zName withheld	8	0.16	0.24	\$ 20,000	\$ 30,000	150%	-	-
22	zName withheld	26	2.64	2.59	\$ 101,352	\$ 99,606	98%	12	2.3
totals/averages:		1430	44.18	42.74	\$ 30,894	\$ 29,887	97%	360	4.0

Survey Results by US Regions

MIDWEST		Title V Facilities	Program Cost	Program Revenue	Average Cost of Regulating Title V Facility	Average Fee Paid by Title V Facility	Program Cost Covered by Revenue	Staff: Full Time Equivalent (FTE)	Title V Facilities/FTE
			\$Million	\$Million	\$	\$	%		
23	Iowa	288	3.69	8.31	\$ 12,809	\$ 28,870	225%	21	13.8
24	Michigan	390	10.50	9.43	\$ 26,923	\$ 24,179	90%	65	6.0
25	Missouri	494	7.51	7.52	\$ 15,209	\$ 15,229	100%	78	6.3
26	Nebraska	100	2.50	2.59	\$ 24,995	\$ 25,889	104%	31	3.2
27	Wisconsin	410	7.53	7.30	\$ 18,368	\$ 17,805	97%	66	6.2
28	zName withheld	297	4.10	3.83	\$ 13,805	\$ 12,896	93%	31	9.6
29	zName withheld	32	0.79	1.02	\$ 24,733	\$ 31,734	128%	16	2.0
totals/averages:		2011	36.62	40.00	\$ 18,212	\$ 19,892	109%	308	6.5

SOUTH		Title V Facilities	Program Cost	Program Revenue	Average Cost of Regulating Title V Facility	Average Fee Paid by Title V Facility	Program Cost Covered by Revenue	Staff: Full Time Equivalent (FTE)	Title V Facilities/FTE
			\$Million	\$Million	\$	\$	%		
30	Alabama	306	8.05	8.40	\$ 26,307	\$ 27,451	104%	64	4.8
31	Alabama-Jefferson County	37	0.91	0.91	\$ 24,595	\$ 24,642	100%	6	6.2
32	Arkansas	198	9.42	7.66	\$ 47,559	\$ 38,712	81%	87	2.3
33	Delaware	134	3.40	3.90	\$ 25,343	\$ 29,116	115%	37	3.6
34	DC-Washington	37	0.80	0.03	\$ 21,622	\$ 811	4%	9	4.1
35	Georgia	413	11.10	12.91	\$ 26,873	\$ 31,264	116%	106	3.9
36	Kentucky	234	13.30	13.30	\$ 56,838	\$ 56,838	100%	168	1.4
37	Mississippi	279	5.03	4.92	\$ 18,012	\$ 17,649	98%	50	5.6
38	North Carolina-Forsyth County	10	0.21	0.13	\$ 20,800	\$ 12,700	61%	2	5.0
39	Oklahoma	337	6.24	7.08	\$ 18,503	\$ 21,012	114%	124	2.7
40	Tennessee-Shelby County	28	0.95	0.89	\$ 33,786	\$ 31,893	94%	10	2.8
41	zName withheld	186	5.64	4.98	\$ 30,323	\$ 26,747	88%	53	3.5
42	zName withheld	36	1.20	1.50	\$ 33,333	\$ 41,667	125%	16	2.3
43	zName withheld	262	6.75	6.61	\$ 25,771	\$ 25,222	98%	88	3.0
totals/averages:		2497	72.98	73.23	\$ 29,226	\$ 29,327	100%	820	3.0

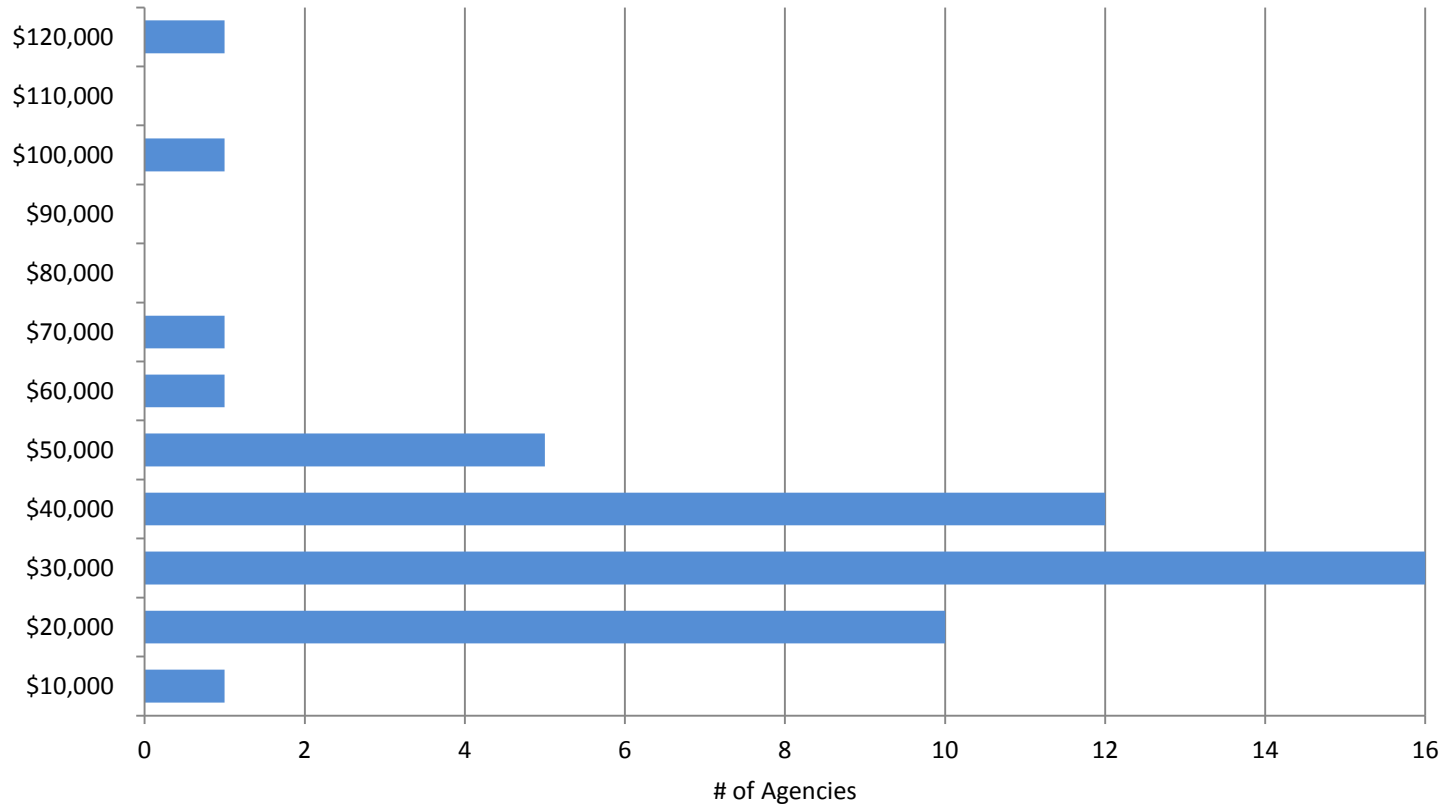
Survey Results by US Regions

NORTH EAST		Title V Facilities	Program Cost	Program Revenue	Average Cost of Regulating Title V Facility	Average Fee Paid by Title V Facility	Program Cost Covered by Revenue	Staff: Full Time Equivalent (FTE)	Title V Facilities/FTE
			\$Million	\$Million	\$	\$	%		
44	Connecticut	67	2.50	2.50	\$ 37,313	\$ 37,313	100%	20	3.4
45	New Hampshire	38	2.89	4.49	\$ 75,974	\$ 118,079	155%	26	1.5
46	New Jersey	260	10.50	5.10	\$ 40,385	\$ 19,615	49%	45	5.8
47	Pennsylvania	524	15.33	13.70	\$ 29,258	\$ 26,145	89%	211	2.5
48	Rhode Island	37	0.96	0.96	\$ 26,057	\$ 26,057	100%	8	4.5
49	Vermont	15	0.10	0.10	\$ 6,667	\$ 6,667	100%	1	15.0
totals/averages:		941	32.28	26.85	\$ 34,306	\$ 28,535	83%	311	3.0

Average Fee Paid by Title V Facilities

Average fee paid by Title V facilities: \$32,331

Data Range: lowest \$5,966, highest \$118,079



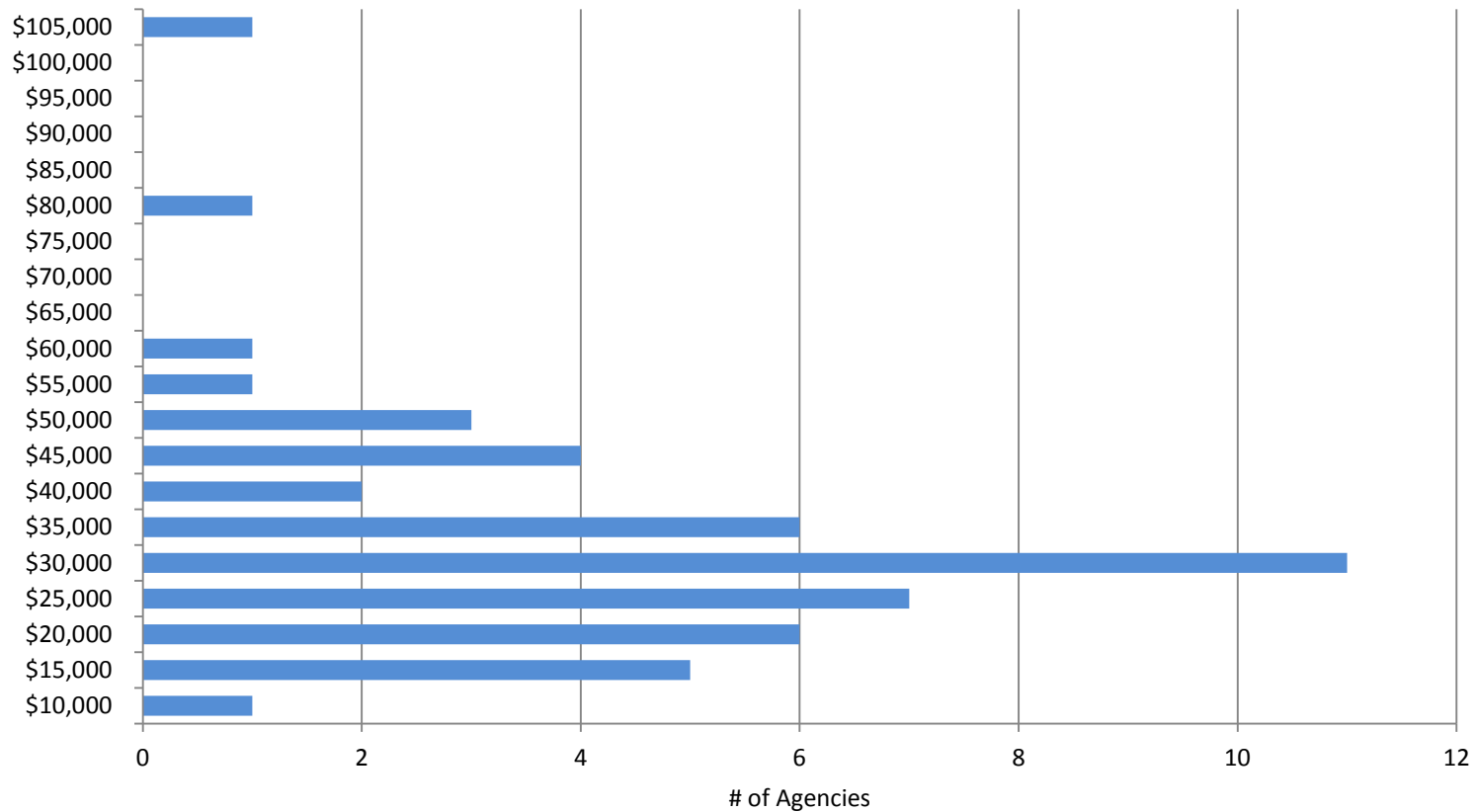
Agencies reporting relevant data: 48

Methodology: In determining the average fee paid by the Title V facility, the agency's emission fees plus other fees are divided by the number of Title V facilities regulated by the agency.

Average Cost of Regulating a Title V Facility

Average cost of regulating a Title V facility: \$30,613

Data Range: lowest \$6,667, highest \$101,352



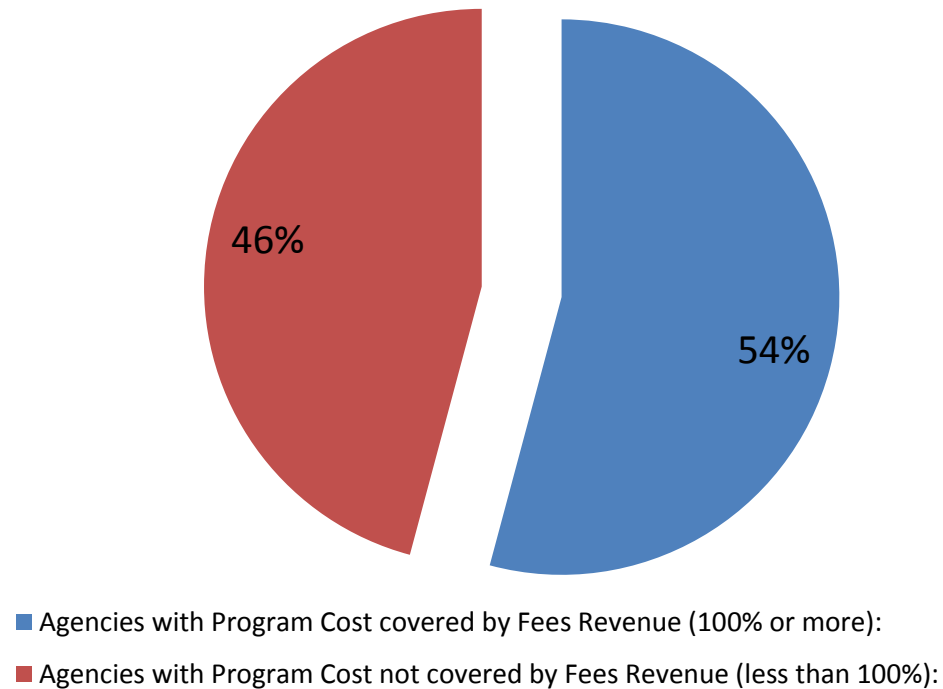
Agencies reporting relevant data: 49

Methodology: In determining the average cost of regulating a Title V facility, the agency's program cost is divided by the number of Title V facilities regulated by the agency.

Program Cost and Fees Revenue

Of 48 agencies, 54% reported that their Title V program cost was covered 100% (or more) by fees revenue

Data Range: lowest 49%, highest 225%

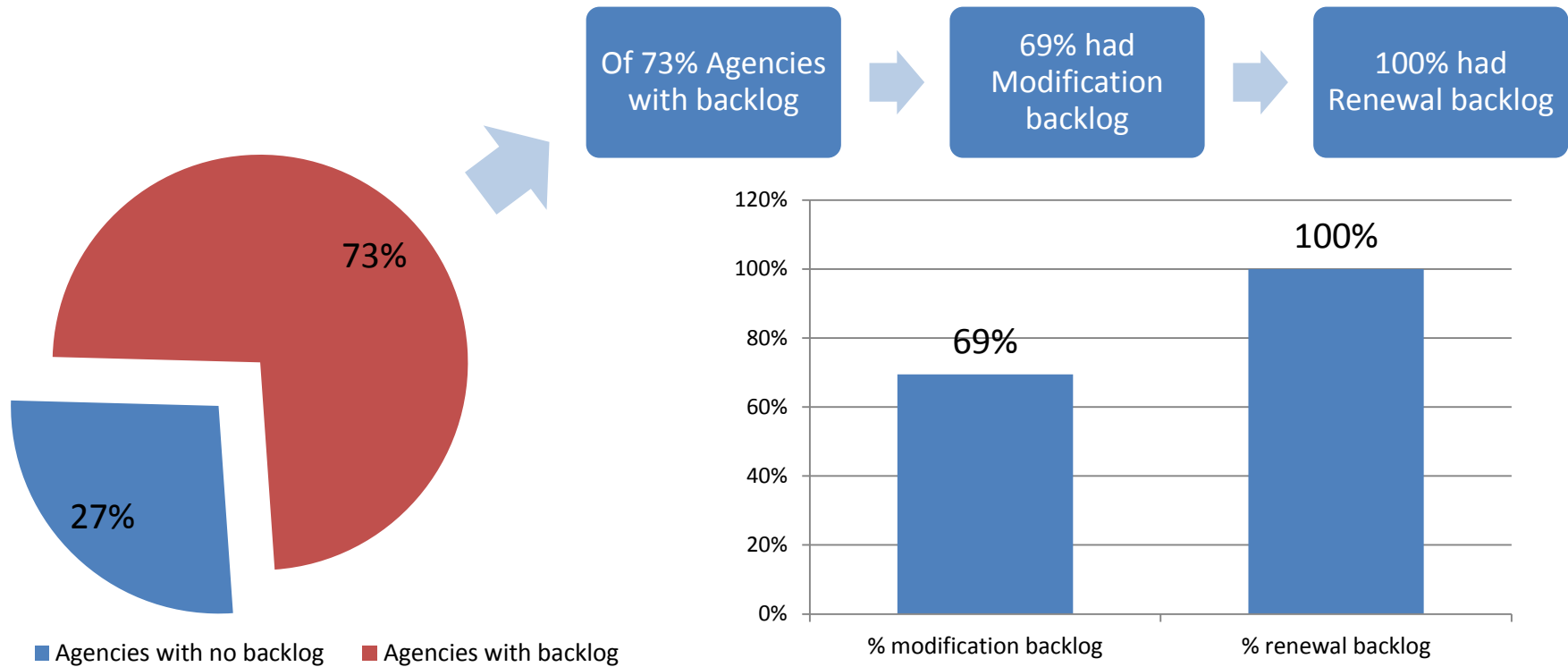


Agencies reporting relevant data: 48

Methodology: In determining the program cost covered by fees revenue, the program revenue (emission and other fees) collected by the agency is divided by the agency's program cost for regulating Title V facilities.

Permit Review Backlogs

Of 49 agencies, 73% reported permit review backlogs



Agencies reporting relevant data: 49

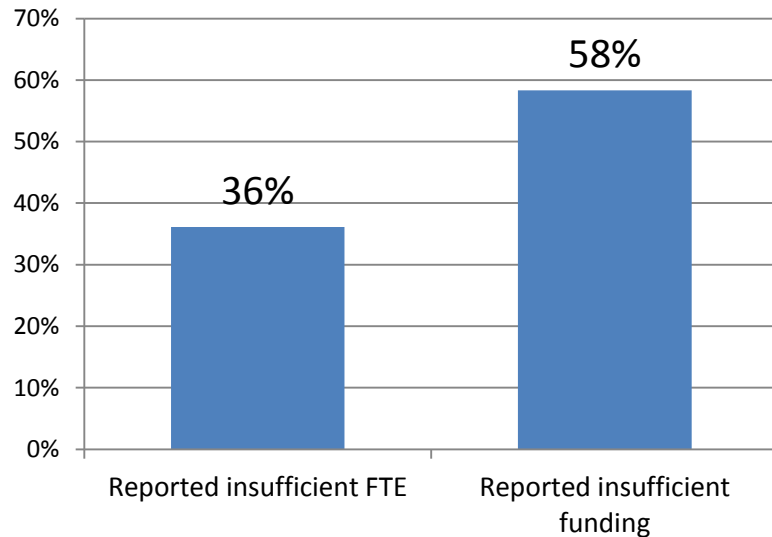
Methodology: Based on number of agencies reporting permit review backlogs. Agencies with backlogs were asked to identify the type of backlogs (modification and/or renewals).

Agencies with Backlogs: Funding and Staffing

Of 36 Agencies with backlogs

36% reported insufficient FTE

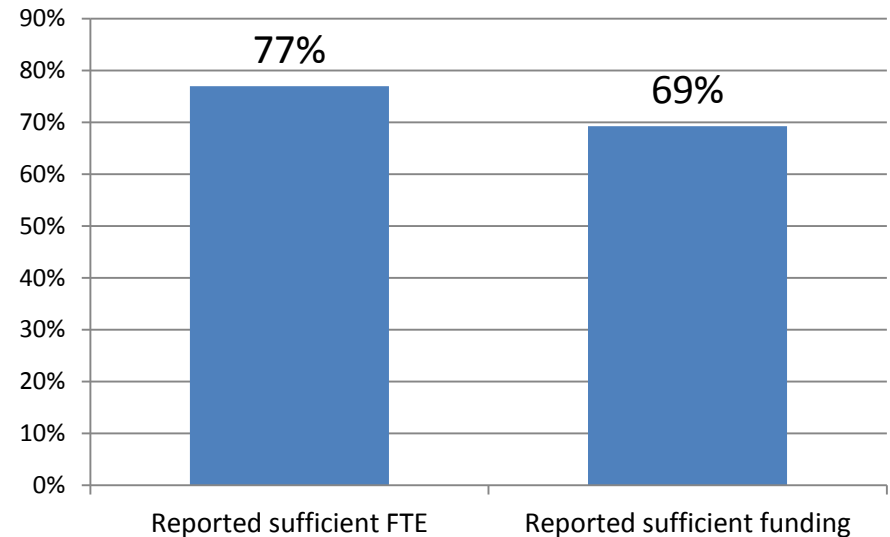
58% reported insufficient funding



Of 13 Agencies with no backlogs

77% reported sufficient FTE

69% reported sufficient funding



Agencies reporting relevant data: 49

Methodology: Based on number of agencies reporting permit review backlogs. Agencies with backlogs were asked if program funding and staffing levels (FTE) were sufficient.

Links to Survey Data and Contact Information

Link to [COMPILATION OF SURVEY DATA](#)

NACAA 2014 SURVEY DATA has been compiled into two versions:

1. Short Version (formatted to print on two pages) contains the most important elements of data.
2. Long Version (not formatted for printing) contains all the data details.

Link to [FEE ANALYSIS REPORT](#)

Fee Analysis Report Content

- Background and Introduction
- Title V Programs with Insufficient Emission Fees
- Increasing Emission Fees and Introducing New Fees - A Multi-Pronged Approach
- Some Stop-Gap Measures
- Title V Programs with Sufficient Funding – What’s Working
- USEPA’s Oversight of Title V Programs
- Conclusion

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