

## Funding of Title V Permitting Programs – PRELIMINARY RESULTS OF NACAA SURVEY

During November 2014, NACAA conducted a survey of state and local air pollution control agencies to examine how agencies are handling fees, for regulating major facilities, as required by Title V of the Clean Air Act. A detailed analysis of survey results is being done by NACAA, NJDEP, and AMEC (NJDEP's air program consultants) and the results will be available in early 2015.

Following are some of the highlights based on a preliminary review of survey data. Selected data and additional details are also provided in the attached table. Some responses received need to be verified (as a part of the data validation) prior to the final release of the results.

### Program Information

- 43 state and local air pollution control agencies participated in the survey to date.
- These agencies regulate more than 5,500 Title V facilities.
- Total Program Cost of regulating 5,500 facilities is \$152 million.
  - Average cost of regulating a Title V facility: \$27,436 (state average: lowest \$11,000, highest \$76,000)
  - Average fees (emission+other) per Title V facility: \$26,427 (state average: lowest \$13,000, highest \$118,000)

### Program Resources

- Average number of Title V facilities per FTE: 3.6 (lowest 1.4, highest 16)
- About 63% of agencies (27 out of 43) reported sufficient staffing level.
- 11 agencies responded that they do not have sufficient staff (5 did not respond). 7 of these agencies plan to add staff.

### Emission Fees

- 51% of the agencies responded that fees are NOT sufficient to fully fund their programs.
- 14 agencies reported sufficient fees to fully fund their programs.
- Ranking of how agencies adjust the emission fees:
  1. Annual CPI Adjustment (19)
  2. Increase by Rule (16)
  3. Increase by Legislative Approval (12)
  4. Annual Evaluation based on Cost (11)
  5. Other (4)
  6. Inventory Stabilization Factor (2)
- 2 agencies (out of 43 responded) currently charge for Greenhouse Gases (GHGs). Hawaii will begin charging fees for GHGs in 2015.

Funding of Title V Permitting Programs - Selected Data from 2014 NACAA Survey

	State - Local Agencies	Title V Facilities	Program Cost (\$Million)	Emission Fees (\$Million)	Program Cost covered by Emission Fees (%)	Are Emission Fees sufficient to fully fund the program? (Y/N)	Other Fees Charged by the Program (\$Million)	Program Cost covered by Other Fees (%)	Full Time Equivalent s (FTEs)	FTEs sufficient? (Y/N)	Plans to Increase FTEs? (Y/N)
1	Alabama-Jefferson County	37	0.91	0.91	100	Y	0.00	0	6	Y	N
2	Alaska	150	3.50	1.80	51	N	1.00	28	40		N
3	Arizona-Maricopa	31	1.30	0.13	10	N	1.20	90	19	Y	
4	Arizona-Pima County	15	0.38	0.07	30	N	0.25	70	3	N	Y
5	Arkansas	198	9.42	5.47	100	Y	2.19	0	87		
6	California-Bay Area	95	4.50	0.60	13	N	2.90	65	10	Y	
7	California-Sacramento	16	0.18	0.00	0	N	0.10	53	1	Y	N
8	Colorado	215	3.12	3.48	100	Y	0.55	13.6	27	N	Y
9	Connecticut	67		2.50		Y			20	Y	N
10	DC-Washington	37		0.03		N			9	Y	N
11	Delaware	134	3.40	3.90		N	0.00	0	37	N	N
12	Georgia	413	11.10	12.74	100	Y	0.18	1.6	106	Y	
13	Hawaii	149		2.70		Y				N	Y
14	Idaho	48	1.49	1.13	66	N	0.50	33	15	Y	N
15	Iowa	288	3.69	8.31	100	Y	0.00	0	21	Y	
16	Kentucky	234	13.30	13.30	100	Y	0.00	0	168	Y	N
17	Mississippi	279	5.03	4.92	100	Y	0.00		50	Y	N
18	Missouri	494	7.51	7.49	99	N	0.03	1	78	Y	N
19	Montana	65	2.55	2.40	100	Y	0.03	1	25	Y	N
20	Nebraska	100	2.50	2.59	70	Y			31	Y	N
21	Nevada-Washoe County	2	0.03	0.02	92	N			8	Y	N
22	New Hampshire	38	2.89	2.90	100	N	1.59	0	26	Y	N
23	New Jersey	260	10.50	4.00	40	N	1.10	10	45	N	N
24	New Mexico	158	3.70	5.00	100	Y			52	Y	
25	North Carolina-Forsyth County	10	0.21	0.06	27.4	N	0.07	33	2	Y	
26	<i>Not Enough Information</i>	1									
27	Oklahoma	337	6.24	6.42			0.66		124	Y	
28	Oregon	114	5.00	3.00	75	Y	1.00	25	35	Y	N
29	Pennsylvania	524	15.33	13.40	87	N	0.30	2	211	N	N
30	Rhode Island	37	0.96	0.96	100	Y			8	N	N
31	Tennessee-Shelby County	28	0.95	0.76	80	N	0.14	20	10	Y	N
32	Utah	93	3.75	3.75	100	Y	0.00	0	29	Y	Y
33	Vermont	15		1.00		N					
34	Washington-Olympic	13	0.36	0.11	33	N	0.22	66.6	3	Y	
35	Washington-Puget Sound	31	1.50	0.38	25	N	1.12	75			N
36	Wisconsin	410	7.53	5.50	75	N	1.80	25	66	Y	N
37	Wyoming	142	4.46	4.33	100	Y			29	N	Y
38	<i>zName Withheld*</i>	8	0.16	0.06		N	0.18	113		Y	N
39	<i>zName Withheld</i>	297		3.83						N	Y
40	<i>zName Withheld</i>	36	1.20	1.50	100	Y	0.00	0	16	Y	
41	<i>zName Withheld</i>	32	0.79	0.79		N	0.22	10	16	N	N
42	<i>zName Withheld</i>	262	6.75	5.74	87	N	0.87	13	88	N	Y
43	<i>zName Withheld</i>	186	5.64	4.98					53	Y	N

\*Name withheld upon agency's request