

BAY AREA AIR QUALITY MANAGEMENT DISTRICT

STAFF REPORT

**PROPOSED AMENDMENTS TO
BAAQMD REGULATION 3: FEES**

APPENDIX B

**SUPPLEMENTAL ANALYSIS OF
TITLE V PROGRAM COSTS**

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1. Background

As discussed in the Staff Report for the proposed amendments to Regulation 3: Fees for FY 2004-2005, the District has been following the recommendations of the 1999 KPMG Cost Recovery Study by increasing fees on an annual basis to keep pace with inflation, and to more closely align fee revenue with the related program costs. In late 1999, the District implemented new timesheet procedures that allow staff time expended on the various programs to be tracked in more detail. These timesheet data have been used to estimate program costs in order to determine the extent to which fee revenue align with these costs.

Timesheet data collected in recent years indicate that the District's costs related to the Title V permit program far exceeded Title V fee revenue. For example, the District's costs of Title V program activities for FY 2002-2003 (covering the period July 1, 2002 to June 30, 2003), including program overhead costs, were about \$2.3 million, while Title V fee revenue for that period was \$1.0 million. The District has proposed significant increases in Title V fees, to be effective July 1, 2004, in order to more closely align Title V revenue with the associated program costs.

A commenter on the District's proposed fee amendments indicated, however, that it is not appropriate to rely on historical timesheet data to estimate projected Title V program costs for future periods. The commenter indicated that large amounts of resources were expended on completing the initial Title V permits for the petroleum refineries during the time period analyzed, and that work should diminish to much lower levels in the years to come.

District staff therefore have completed a supplemental analysis of the projected costs of Title V permit activities, for FY 2004-2005 and the next four upcoming fiscal years, that does not rely on the use of historical timesheet data. Rather, the supplemental analysis uses a bottom-up "task-based" approach to estimate Title V program costs. The resulting cost estimates are used (1) to verify whether the proposed increase in Title V fees is justified, and (2) to establish new fees for different types of Title V permit applications that are proportional to the District resources needed to complete these permit actions. This report summarizes the methodology and results of this analysis.

2. Title V Program and Fees

The Title V permit program requires large industrial facilities, and other designated facilities, to obtain federal operating permits. These permits list all federal Clean Air Act and state and local air emission limitations and standards that apply to the facility, and describe the monitoring, record keeping, and reporting requirements that are needed to ensure compliance. In the Bay Area, the U.S. EPA has authorized the District to issue Title V permits. The District's Title V permits are called Major Facility Review (MFR) permits, and are issued according to the requirements of District Regulation 2, Rule 6: Major Facility Review. Regulation 2, Rule 6 also contains provisions for Synthetic Minor permits, which are used to establish enforceable permit conditions that limit a facility's

potential to emit to below the threshold levels at which an MFR permit would be required.

As a Title V permitting agency, the District is required to collect fees from subject facilities to fully cover the costs of implementing and enforcing the Title V program. These fees are specified in District Regulation 3: Fees. Regulation 3, Schedule P: Major Facility Review Fees specifies fees for facilities that require MFR and Synthetic Minor permits. Schedule P is intended to cover the District's costs of processing MFR and Synthetic Minor permit applications, and completing other tasks that are a direct consequence of the Title V program. The Title V and Synthetic Minor facilities in the Bay Area currently subject to Schedule P fees are listed in Tables 2a and 2b. It is important to note that all District-permitted facilities, including the facilities that are subject to fees in Schedule P, are subject to District fees based on one or more of the other fee schedules in Regulation 3. These other fees are collected to cover the District's costs of implementing and enforcing regulatory programs related to permitted stationary sources that would exist without the Title V permit program.

The Title V program includes two types of activities: permitting activities and on-going activities. Permitting activities include: (1) evaluating and issuing MFR permits (i.e., initial permits, administrative amendments, minor revisions, significant revisions, reopenings, and renewals) and Synthetic Minor permits, (2) informing the public, EPA, and CARB of initial MFR permits, and any subsequent changes in the permits, and evaluating any input received, and (3) maintaining MFR permit records. On-going activities include additional activities related to enforcement and administration of the MFR permits that are a direct consequence of the Title V program. Some of these on-going activities include: (1) determining applicability, (2) tracking federal rules and regulations, (3) tracking and reviewing monitoring reports, compliance certifications, and deviation reports, (4) enforcing Title V reporting requirements, (5) completing technical review of emissions monitoring activities that are a direct consequence of the Title V program (e.g., reviewing source test protocols and source test results submitted by testing contractors, and completing audits on emission monitors), (6) defending legal challenges to MFR permit actions, (7) and preparing reports and other information for EPA and the public.

Currently, about 95 percent of Title V program revenue comes from annual fees and only about 5 percent comes from permit application fees. However, the District has increasingly found that permitting activity for Title V facilities is more resource-intensive than permitting activity for other facilities. The reasons for the increased resources that must be expended on Title V permitting activity are discussed in more detail in the following Section.

3. Factors Impacting Staff Resources Required for MFR Permitting Activities

- a. MFR permits must contain all applicable requirements and monitoring to assure compliance.

In traditional District permits, the burden for knowing the applicable requirements, other than permit conditions established under preconstruction review, is placed on the permit holder. For MFR permits, the District must analyze which requirements apply and cite them in detail in the permit. The District's MFR facilities are very sophisticated and insist that regulations be cited in detail, not in a general manner.

b. The MFR permit evaluations are much more comprehensive.

The Engineering Division writes a Statement of Basis (SOB) for each permit. The SOB is an EPA requirement that explains the permit structure, gives basic information about the facilities, reviews any complex applicability determinations, explains monitoring decisions, and discusses any permit shields. Preparation of an SOB is much more labor-intensive than preparation of a typical District permit evaluation.

c. MFR permits have a higher level of review.

The draft MFR permit and SOB are reviewed by the District's Legal, Technical Services, and Compliance and Enforcement Divisions, and by the facilities themselves before they are published for public comment. The Compliance and Enforcement Division reviews compliance records for one year for initial permits and for the previous permit term for renewals, and prepares compliance reports. The Engineering staff responds to comments from the other Divisions and the facilities, and revises the proposed permit before publication.

District Counsel, the DAPCO, and the APCO review the permits before publication and before issuance. District Counsel is also often consulted during the drafting of permits. The APCO signs the MFR permits.

d. The permit publication and issuance procedures are very formal.

The MFR permits are public documents that are subject to EPA and public review. In the federal regulations for Title V, EPA has set up formal requirements and procedures for public notice and permit issuance. Even when minor corrections must be made to the permits, the permit must be signed by the APCO and must be transmitted to EPA, CARB, and the District's website in a formal manner. Each revision to the permit must be carefully recorded to ensure that the permits are accurate and legally supported.

e. The District must respond to EPA and public comments.

After the public notice and EPA review periods are over, the District prepares responses to any comments and revises the permit as necessary for issuance. Staff at all levels and Divisions may be involved in preparing the responses, depending on the issues raised. The responses are reviewed by the entire chain of command and are approved by the APCO.

- f. Public Hearings may be necessary.

It may be necessary to hold a Public Hearing so that members of the public can provide oral comments on proposed MFR permits. These hearings are generally held in the affected community and are costly and labor-intensive.

- g. More permits mean more applications for revisions.

The District now has issued 91 MFR permits. Since the largest companies now all have Title V permits, all permit applications at MFR facilities will also be MFR permit revisions with added costs.

4. MFR Permitting Costs

Due to the high cost of issuing MFR permits and the increased staff time expected to be devoted to these permits now that the District has 91 MFR permits to maintain, the District is proposing to recover a larger portion of the costs for the Title V program from fees for MFR permitting activities. Staff believes the most equitable method for recovering these costs is to charge for the various permitting activities in proportion to the District resources expended for each type of permitting activity.

In order to gain a better understanding of the costs for various MFR permitting activities, the District gathered historical data about the different types of MFR permitting activities (see Tables 3a-e) and prepared a detailed task-based staff resource estimate for each type of permitting activity (see Table 4a-f). The MFR permitting activity data and the application type staff cost estimates were then combined to estimate the total annual costs for each type of MFR permitting activity (see Tables 6a-e). The methods used to evaluate historical permit activity data, determine staff resources, calculate annual MFR permitting activity costs, and determine the appropriate Schedule P application fees are discussed in detail in the following Section. It should be noted that cost estimates for issuing and revising Synthetic Minor permits were not made because these costs are very low relative to the costs of MFR permits.

4.1 Methodology

The following information summarizes the assumptions applied to historical permit activity data, and the methods used to calculate staff resources, annual application costs, and Schedule P MFR application fees.

- a. Historical Permit Activity Data

Staff gathered permit activity data (i.e., number of applications, sources per application, and fees collected per application) for all Title V facilities for the last two fiscal years (July 2002 through April 2004) from the District's permit database. These data were used to determine the average number of applications per year, the average number of applications per facility, and the average number of sources per application. This data

is summarized in Tables 3a and 3b. Database information was also used to determine the current number of Title V facilities, number of sources at Title V facilities, number of monitors at Title V and Synthetic Minor facilities, and emissions at Title V facilities. The median number of sources at a Title V facility was used to estimate the number of sources for future initial permits, because no new large facilities are expected to become subject to Title V. Title V and Synthetic Minor facility data is provided in Tables 2a and 2b.

Staff maintains data on all MFR permit actions in a spreadsheet. This MFR permit action data was used to determine the average number of administrative amendments per year (Table 3c), the average number of reopenings per year (Table 3d), and the percentages of significant and minor revisions (25 percent significant and 75 percent minor). These percentages were multiplied by the average application activity to determine the average number of significant and minor revisions and the average number of sources for a significant revision and average number of sources per minor revision (Table 6a). Based on knowledge of the content of Title V permits, staff estimated the number of sources with permit shields that might be impacted by revisions and renewals (Table 6a).

Permit expiration dates were used to determine the number of renewal applications expected and the number of sources in these applications for each of the next five fiscal years. The variation in renewal fees is expected to be large from year to year, because most of the larger facilities were issued initial MFR permits in 2003. The range in the number of renewal applications and sources was used to establish a low and high estimate of the total annual application fees (Table 7c). The average number of renewal applications and sources per application were used to establish the Schedule P fee (Table 3e).

b. Staff Resources for Permitting Actions

Cost estimates have been prepared for each type of permit action that the District anticipates at MFR facilities: initial permits (Table 4a), administrative amendments (Table 4b), minor revisions (Table 4c), significant revisions (Table 4d), reopenings (Table 4e), and renewals (Table 4f). Initial permits, renewals, significant revisions, and reopenings share a similar process in that these actions all require public notice and EPA review. Minor revisions do not require public notice but do require EPA review. Administrative amendments do not have to be proposed but rather are issued directly.

The methodology used to establish staff resources for each type of MFR permit action was as follows:

1. Tabulate each task.
2. Estimate a low and a high time period to complete each task.
3. Multiply each low and high time period by the hourly rate (adjusted to include the cost of salary and benefits) of the staff member that performs that task.

4. Sum the hours and costs for each type of action to get a range between the low and high costs for each action.
5. Calculate the average (mean) of the range for each action.

The task lists and the estimates of the time periods necessary to complete each task were based on estimates provided by staff members that have significant experience in these areas in the Engineering, Compliance and Enforcement, Legal, and Technical Services Divisions. The staff times and staff resources needed for each type of MFR permit activity are summarized in Table 4.

c. Calculation of Average Annual MFR Permitting Costs

The low and high range of annual costs were determined by multiplying the average number of applications per year per activity type by the low and high range of staff cost per application type. The historical average number of applications per year for each type of MFR permit activity was multiplied by the average staff resource cost for each application type to determine the average annual costs for MFR permitting activities (Table 6b).

d. Calculation of Schedule P MFR Permit Application Fees

MFR permit application fees that are in proportion to the estimated level of resources expended on each type of application were determined (Table 6e). It is important to note that these fees do not represent full cost recovery for processing MFR applications, but rather a set percentage of full cost recovery that is necessary to achieve a target budgeted revenue figure for all MFR permit applications. In order to achieve this target budgeted revenue figure, it was determined that the applicable application fees had to be about 12 percent of the fees that were necessary for full cost recovery (Table 6d).

Staff have established set fees for the MFR filing fee and the MFR permit shield fee. The MFR filing fee will be the same as the standard filing fee for other types of permit applications. The MFR permit shield fee will be the same as the current permit shield fee.

The projected revenue from filing fees and permit shield fees for each application type was determined by multiplying the average number of applications or shields expected per year by the applicable fee. These filing and permit shield revenues were subtracted from the average annual cost per application type to obtain a remaining MFR permit cost per year per application type. This remaining cost was divided by the number of sources per year for each application type (or number of applications per year for administrative amendments) to obtain a cost per unit per application type (Table 6c).

The budgeted amount for MFR permit costs (minus total filing and permit shield fees) was divided by the total annual staff cost for MFR permitting activities to obtain an adjustment factor (Table 6d). This adjustment factor was multiplied by the cost per unit

per application type to obtain the fee for Schedule P for each type of permit action. All fees were rounded up to the nearest dollar (Table 6e).

5. On-Going Title V Costs

The District has made preliminary estimates for some of the ongoing costs of the Title V program, but more analysis is required before the figures can be finalized. The preliminary estimate is \$1.0 million for the following activities: (1) tracking and reviewing monitoring reports, compliance certifications, and deviation reports, (2) defending legal challenges to MFR permit actions, (3) and preparing reports and other information for EPA and the public. The on-going costs evaluated to date are summarized in Table 5.

Estimates for the following activities have not yet been prepared: (1) determining applicability, (2) tracking federal rules and regulations, (3) training personnel, (4) assisting facilities with compliance certification requirements, (5) enforcing Title V reporting requirements, (6) reviewing testing protocols for contractor conducted source tests required by the MFR program, (7) witnessing contractor conducted source tests required by the MFR program, (8) enforcing Title IV acid rain monitoring requirements, (9) responding to additional public records requests, (10) Administration Division support, and (11) Information Systems Division support. Additional work will be done to estimate the costs of these activities during the next fiscal year.

6. Results and Conclusions

Cost estimates for completing specific types of MFR permit applications have been developed and are presented in the attached Tables. These cost estimates have been used to establish MFR applications fees that are proportional to the District staff resources required.

Table 1 contains a summary of the District's annual Title V program costs over the next five years. The District's total annual costs for MFR permitting activities are estimated to be between \$1.2 million and \$3.5 million, with an average of \$2.35 million. On-going costs for the Title V program are estimated to average at least another \$1.0 million. It should be noted that the task-based analysis for on-going staff costs completed at this time does not include a number of on-going activities. In addition, the costs associated with Synthetic Minor permits have not been included. Finally, the cost figures in Table 1 include only the costs of District staff salaries and benefits, and do not include program overhead costs.

The Title V program cost estimates previously made by the District based on recent historical timesheet data are within the range of cost estimates made using the bottom-up task-based methodology summarized in this report (e.g., using timesheet data collected during the period July 1, 2002, to June 30, 2003, the projected Title V program cost for FY 2004-2005 is \$2,428,700). However, if the task-based cost estimates were adjusted to include all ongoing Title V program activities, and overhead costs, these cost projections would likely exceed the timesheet-based figures.

Table 1 Summary of Title V Program Cost Estimates *

	Low Annual Cost	High Annual Cost	Average Annual Cost
MFR Application Activities			
Administrative Amendments	\$4,196	\$5,857	\$5,026
Minor Revisions	\$499,950	\$1,588,870	\$1,044,410
Significant Revisions	\$264,920	\$1,012,592	\$638,756
Reopenings	\$18,617	\$79,118	\$48,868
Renewals	\$391,620	\$760,167	\$575,893
Initial Permits	\$21,772	\$46,348	\$34,060
Subtotal MFR Applications	\$1,201,075	\$3,492,952	\$2,347,013
On-Going Activities *	\$753,985	\$1,256,641	\$1,005,313
Total for All Activities	\$1,955,060	\$4,749,593	\$3,352,326

* Cost estimates include District staff salaries and benefits only. The range between low and high cost estimates primarily reflects year-to-year variation in MFR permit renewals between FY 2004-2005 and FY 2008-2009. All cost figures are based on FY2004-2005 salaries and benefits.

** Low and high range of ongoing activities estimated to be plus or minus 25% from the average. The figures provided do not include all types of on-going costs.

Table 2a. Title V Facilities, Sources, Emissions, and Monitors

MFR Sites Subject to Fees As of February 1, 2004				
	Site Number	Permitted Sources	Emissions (tons/yr)	Monitors
	A0010	310	5935.4	17
	A0011	313	7503.8	22
	A0012	17	1679.6	14
	A0016	163	3686.2	12
	A0017	97	4551.8	2
	A0018	9	692.7	4
	A0022	18	2487	1
	A0023	25	232.2	1
	A0024	8	323.1	2
	A0026	17	349.1	2
	A0030	37	802.3	0
	A0031	179	66.9	0
	A0041	41	544.9	0
	A0051	110	284.7	2
	A0054	44	23.1	0
	A0062	16	216.3	0
	A0079	19	49.7	0
	A0083	19	283.8	0
	A0148	32	270.4	0
	A0227	96	72.2	3
	A0273	9	19.4	0
	A0575	4	12.3	0
	A0581	29	17.7	0
	A0591	21	158.6	0
	A0606	54	184.1	0
	A0621	4	129.7	0
	A0710	63	8.3	0
	A0732	8	419.3	1
	A0733	17	55.9	0
	A0778	42	515.5	0
	A0907	27	112.4	3
	A0927	27	38.9	0
	A1179	19	56.7	0
	A1209	26	74.1	0
	A1317	21	84.1	0
	A1364	1	16.6	0
	A1403	25	11.3	0
	A1438	232	745.1	0
	A1464	4	40.2	0
	A1665	17	12.2	0
	A1675	9	5.2	0
	A1784	59	46.5	0
	A1812	1	50.7	0
	A1820	8	254.2	2
	A1840	16	88.6	0
	A2039	6	114.5	0
	A2066	13	434.9	0
	A2124	6	16.3	0
	A2246	4	64.3	0

MFR Sites Subject to Fees As of February 1, 2004				
	Site Number	Permitted Sources	Emissions (tons/yr)	Monitors
	A2254	11	323.3	0
	A2266	5	118.7	0
	A2371	56	120	2
	A2561	2	1.3	0
	A2721	5	18.3	0
	A2740	2	44.7	0
	A2918	4	26.5	0
(not issued yet)	A3024	16	85.1	0
	A3288	5	32.5	0
	A3294	7	17.9	0
	A3464	1	19.3	0
	A4020	37	46.3	0
	A4022	35	11.7	0
	A4618	3	39	0
	A5095	4	28.4	0
(not issued yet)	A6499	1	10.8	0
	A7034	31	41.3	0
	A7265	3	71.1	0
	A7974	3	4	0
	A8664	5	243.6	4
	A9013	2	151.3	0
	A9183	1	14.9	0
	B1180	7	317.1	2
	B1326	3	292.8	1
	B1362	30	532.7	0
	B1661	18	206.5	1
	B1668	4	275.2	0
	B1669	5	205.6	0
	B1670	9	436.6	0
	B1866	6	353.9	0
	B1887	8	25.6	0
	B1911	105	92.3	0
	B1928	9	431.7	3
	B2095	7	359.8	0
	B2626	179	10258	7
	B3193	45	77.4	1
	B4327	5	36.5	0
	B4414	2	1.1	0
	B4416	2	1.1	0
	B4628	247	7053.2	14
	B5128	9	301.7	3
	B5393	5	301	1
Total	91	3286	56872.6	127
Average		36	625.0	1
Median *		13	92.3	0

* A more recent list of the number of sources at Title V sites indicated that the median number of sources was 17.

Table 2b. Synthetic Minor Facilities, Sources, Emissions, and Monitors

SM Sites Subject to Fees As of February 1, 2004				
	Site Number	Permitted Sources	Emissions (tons/yr)	Monitors
	A0055	202	43.9	0
	A0158	14	21.9	0
	A0159	13	18.4	0
	A0232	15	9.4	0
	A0401	17	27.4	0
	A0556	30	20.7	0
	A0567	49	10.8	0
	A0703	26	44.5	0
	A0770	98	11.3	0
	A0828	29	22.7	0
	A0896	20	31.2	0
	A1148	2	2.4	0
	A1396	12	4.8	0
	A1603	15	1.3	0
	A1634	8	69	0
	A1703	2	2.1	0
	A1965	13	20	0
	A2193	8	17.6	0
	A2478	7	90	4
	A3243	12	149.6	3
	A3244	12	153.8	3
	A3245	12	154.1	3
	A3246	12	166	3
	A3370	1	1.5	0
	A3981	13	119.2	3
	A6044	1	80.5	2
	A6995	12	3.6	0
	A8507	24	8.3	0
	B0521	33	9.9	0
	B0861	55	28.3	2
	B2855	23	9.9	0
	B5023	8	32.1	0
Total	32	798	1386.2	23
Average		25	43.3	1
Median		13	21.3	0

**Tables 3a-e. Application Activity at Synthetic Minor and Title V Facilities:
Projected Application Activity for FY 04-05 (July 2004 - June 2005)
Based on Historical Average Application Activity from July 2002 through April 2004**

Table 3a. Applications at Synthetic Minor Facilities

	Months of Data	Number of Sites	Number of Applications	Number of Sources	Sources per Application
Actual for FY 02-03	12	11	17	29	1.7
Actual for FY 03-04	8	8	15	33	2.2
Total for 7/02 - 4/04	20	19	32	62	1.9
Average per Months		0.95	1.60	3.10	
Projected for FY 04-05	12	11	19	37	

Table 3b. Applications at Title V Facilities

	Months of Data	Number of Sites	Number of Applications	Number of Sources	Sources per Application
Actual for FY 02-03	12	60	165	479	2.9
Actual for FY 03-04	8	47	117	291	2.5
Total for 7/02 - 4/04	20	107	282	770	2.7
Average per Months		5.35	14.10	38.50	
Projected for FY 04-05 (minor and significant)	12	64	169	462	

Table 3c. Administrative Amendments

	Months of Data	Number of Sites	Number of Applications	Number of Sources	Sources per Application
Actual for FY 02-03	12	8	8		0.0
Actual for FY 03-04	8	2	2		0.0
Total for 7/02 - 4/04	20	10	10		0.0
Average per Months		0.50	0.50		
Projected for FY 04-05 (administrative)	12	6	6		

Table 3d. Reopenings

	Months of Data	Number of Sites	Number of Applications	Number of Sources	Sources per Application
Actual for FY 02-03	12	0	0		
Actual for FY 03-04	8	6	6	46	7.7
Total for 7/02 - 4/04	20	6	6	46	7.7
Average per Months		0.30	0.30	2.30	
Projected for FY 04-05 (reopenings)	12	3	3	27	

Table 3e. Renewals

	Once Every Five Years	Number of Sites	Number of Applications	Number of Sources	Sources per Application
Total T5 Facilities		91	91	3286	36.1
Projected for FY 04-05 (renewals)		18	18	657	36.5

Table 4. Summary of Task-Based Staff Resources Analyses for MFR Application Activities

MFR Application Type	Staff Processing Time Estimates			Staff Resources Cost Estimates		
	Low	High	Avg.	Low	High	Avg.
	hrs/permit	hrs/permit	hrs/permit	\$/permit	\$/permit	\$/permit
Initial Permits	418.10	866.90	642.50	\$ 21,772	\$ 46,348	\$ 34,060
Administrative Amendments	15.25	21.95	18.60	\$ 699	\$ 976	\$ 838
Minor Revisions	74.35	228.40	151.38	\$ 3,968	\$ 12,610	\$ 8,289
Significant Revisions	120.85	435.15	278.00	\$ 6,308	\$ 24,109	\$ 15,208
Reopenings	116.85	470.65	293.75	\$ 6,206	\$ 26,373	\$ 16,289
Renewals	417.60	789.15	603.38	\$ 21,757	\$ 42,231	\$ 31,994

Table 4a. Task-Based Analysis for Completion of an Initial MFR Permit

	Personnel	Time Estimate hrs Low	Time Estimate hrs High	Cost per Employee \$/hour FY 04/05	Resource Estimate \$ Low	Resource Estimate \$ High
INTERNAL REVIEW						
1	Discussion w/applicant	AQII	1.00	4.00	52.676	52.68 210.70
2	Set up application, give to supervisor	Secy	0.25	0.50	29.328	7.33 14.66
3	Assign application	SPE	0.25	0.25	64.025	16.01 16.01
4	Review application, send incomplete letters, generate invoice, write evaluation/SOB, prepare revised Title V permit, consider CAM, NESHAPS	AQII	40.00	200.00	52.676	2107.04 10535.20
5	Format permit	Secy	0.50	16.00	29.328	14.66 469.25
6	Supervisor review	SPE	8.00	16.00	64.025	512.20 1024.40
7	Negotiation w/engineer	SPE	4.00	8.00	64.025	256.10 512.20
	Negotiation w/engineer	AQII	4.00	8.00	52.676	210.70 421.41
8	Revision based on supervisor review	AQII	8.00	24.00	52.676	421.41 1264.22
9	Review by Title V lead	SRE	8.00	8.00	58.084	464.67 464.67
10	Negotiation w/engineer	SRE	4.00	8.00	58.084	232.34 464.67
	Negotiation w/engineer	AQII	4.00	8.00	52.676	210.70 421.41
11	Revision based on Title V lead review	AQII	2.00	16.00	52.676	105.35 842.82
12	Write internal review memo, enter on tracking ss, request compliance report for Enf.	SRE	0.50	0.50	58.084	29.04 29.04
13	Signoff-Eng	AQII	0.25	0.25	52.676	13.17 13.17
14	Signoff-supervisor	SPE	0.50	0.50	64.025	32.01 32.01
15	Signoff-manager	Manager	0.00	4.00	67.236	0.00 268.94
16	Signoff-Title V supervisor	SPE	0.25	2.00	64.025	16.01 128.05
17	Signoff-Manager Permit Evaluation	Manager	4.00	4.00	67.236	268.94 268.94
18	Signoff-Director of Engineering, transmittal to secy	Director	4.00	4.00	81.718	326.87 326.87
19	Request for copies	Secy	0.25	0.25	29.328	7.33 7.33
20	Print copies of package for transmittal	Repro	0.50	2.00	26.611	13.31 53.22
21	Transmittal to Divisions, applicant	Secy	2.00	2.00	29.328	58.66 58.66
22	Review by Legal	Counsel	1.00	4.00	91.741	91.74 366.96
23	Enforcement handling	Secy	7.50	7.50	29.328	219.96 219.96
24	Review by Enforcement	INS	100.00	100.00	43.342	4334.20 4334.20
25	Review by Enforcement	SINS	80.00	80.00	52.676	4214.08 4214.08
26	Review by Enforcement	ESP	2.00	2.00	60.983	121.97 121.97
27	Review by Enforcement	Manager	40.00	40.00	67.236	2689.44 2689.44
28	Review by Enforcement	Director	1.00	1.00	81.718	81.72 81.72
29	Compliance report preparation	INS	8.00	8.00	43.342	346.74 346.74
30	Compliance report review	SINS	1.00	1.00	52.676	52.68 52.68
31	Compliance report review	ESP	1.00	1.00	60.983	60.98 60.98
32	Compliance report review	Manager	1.00	1.00	67.236	67.24 67.24
33	Compliance report review	Director	1.00	1.00	81.718	81.72 81.72
34	Review by Source Test	AQII	12.00	12.00	52.676	632.11 632.11
35	Respond to questions, accept comments	AQII	4.00	20.00	52.676	210.70 1053.52
36	Revise permit to respond to comments	AQII	2.00	16.00	52.676	105.35 842.82
37	Review response to comments	SPE	1.00	8.00	64.025	64.03 512.20
38	Review response to comments	SRE	1.00	4.00	58.084	58.08 232.34
PUBLIC NOTICE						
39	Set up proposal package inc public notice, library letter, call library if necessary, copy application if necessary	Secy	4.00	4.00	29.328	117.31 117.31

	Personnel	Time Estimate hrs Low	Time Estimate hrs High	Cost per Employee \$/hour FY 04/05	Resource Estimate \$ Low	Resource Estimate \$ High	
40	Review proposal package (letters)	AQII	2.00	2.00	52.676	105.35	105.35
41	Review proposal package (letters)	SRE	2.00	2.00	58.084	116.17	116.17
42	Print proposal package (letters, permit, sob)	Secy	0.50	2.00	29.328	14.66	58.66
43	Route proposal package-memo, entry in tracking spreadsheet (letters, permit, sob)	SRE	0.50	0.50	58.084	29.04	29.04
44	Signoff-Eng	AQII	0.25	0.25	52.676	13.17	13.17
45	Signoff-supervisor	SPE	0.50	0.50	64.025	32.01	32.01
46	Signoff-manager	Manager	0.00	4.00	67.236	0.00	268.94
47	Signoff-Title V supervisor	SPE	0.25	2.00	64.025	16.01	128.05
48	Signoff-Manager Permit Evaluation	Manager	4.00	4.00	67.236	268.94	268.94
49	Signoff-Director of Engineering	Director	4.00	4.00	81.718	326.87	326.87
50	Log package before transmittal out of division	Adsecy	0.25	0.25	33.956	8.49	8.49
51	Deliver package-mail	Clerk	0.10	0.10	26.611	2.66	2.66
52	Signoff-Legal	Counsel	1.00	2.00	91.741	91.74	183.48
53	Signoff-DAPCO	DAPCO	0.50	1.00	90.103	45.05	90.10
54	Signoff-APCO	APCO	0.50	1.00	98.41	49.21	98.41
55	Log package before transmittal to Engineering	Adsecy	0.10	0.25	33.956	3.40	8.49
56	Deliver package-mail	Clerk	0.10	0.10	26.611	2.66	2.66
57	Date letters	Secy	0.25	0.25	29.328	7.33	7.33
58	Generate EPSS transmittal form	SRE	0.25	0.25	58.084	14.52	14.52
59	Turn permit, letters, reports, appendices into PDF	Secy	2.00	2.00	29.328	58.66	58.66
60	Scan documents	Secy	1.00	1.00	29.328	29.33	29.33
61	Send to EPA via EPSS system	Secy	0.25	1.50	29.328	7.33	43.99
62	Send public notice to mailing list	Secy	2.00	2.00	29.328	58.66	58.66
63	Advise Permits Web personnel, PI&E and others via email	Secy	0.25	0.25	29.328	7.33	7.33
64	Update database	Secy	0.50	1.00	29.328	14.66	29.33
65	Post package on web, write listbot	AQII	1.00	1.00	52.676	52.68	52.68
66	Send listbot to world	ISS	1.00	1.00	46.631	46.63	46.63
67	Print copies of proposal package for transmittal	Repro	0.50	2.00	26.611	13.31	53.22
68	Mail package	Secy	1.00	1.00	29.328	29.33	29.33
69	Write press release	PIO	2.00	2.00	46.631	93.26	93.26
70	Send to newspapers	PIO	1.00	1.00	46.631	46.63	46.63
71	Get purchase order number	Secy	0.25	0.25	29.328	7.33	7.33
72	Assign purchase order number	ACC	0.25	0.25	38.363	9.59	9.59
73	Place ad	Secy	1.00	1.00	29.328	29.33	29.33
74	Respond to questions, accept comments	AQII	2.00	16.00	52.676	105.35	842.82
ISSUANCE							
75	Prepare response to comments documents	AQII	0.00	40.00	52.676	0.00	2107.04
76	Review and amend response to comments documents	SPE	0.00	16.00	64.025	0.00	1024.40
77	Review and amend response to comments documents	SRE	0.00	16.00	58.084	0.00	929.34
78	Review and amend response to comments documents	Manager	0.00	4.00	67.236	0.00	268.94
79	Review and amend response to comments documents	Counsel	0.00	12.00	91.741	0.00	1100.89
80	Prepare clean copy of permit	AQII	2.00	8.00	52.676	105.35	421.41
81	Prepare issuance package	Secy	2.00	2.00	29.328	58.66	58.66
82	Review issuance package, amend letters if necessary	AQII	0.50	4.00	52.676	26.34	210.70

	Personnel	Time Estimate hrs Low	Time Estimate hrs High	Cost per Employee \$/hour FY 04/05	Resource Estimate \$ Low	Resource Estimate \$ High	
83	Review issuance package, amend letters if necessary	SPE	0.50	4.00	64.025	32.01	256.10
84	Review issuance package, amend letters if necessary	SRE	0.50	2.00	58.084	29.04	116.17
85	Signoff-manager	Manager	1.00	4.00	67.236	67.24	268.94
86	Signoff-Title V supervisor	SPE	0.25	2.00	64.025	16.01	128.05
87	Signoff-Manager Permit Evaluation	Manager	1.00	4.00	67.236	67.24	268.94
88	Signoff-Director of Engineering	Director	1.00	4.00	81.718	81.72	326.87
89	Log package before transmittal out of division	Adsecy	0.10	0.25	33.956	3.40	8.49
90	Deliver package-mail	Clerk	0.10	0.10	26.611	2.66	2.66
91	Signoff-Legal	Counsel	0.50	1.00	91.741	45.87	91.74
92	Signoff-DAPCO	DAPCO	0.50	1.00	90.103	45.05	90.10
93	Signoff-APCO	APCO	0.50	1.00	98.41	49.21	98.41
94	Log package before transmittal to Engineering	Adsecy	0.25	0.25	33.956	8.49	8.49
95	Deliver package-mail	Clerk	0.10	0.10	26.611	2.66	2.66
96	Date letters	Secy	0.25	0.25	29.328	7.33	7.33
97	Revise dates in permit	Secy	0.50	0.50	29.328	14.66	14.66
98	Generate EPSS transmittal form	SRE	0.25	0.25	58.084	14.52	14.52
99	Turn permit, letters into PDF	Secy	1.00	1.00	29.328	29.33	29.33
100	Send to EPA via EPSS system	Secy	0.25	1.50	29.328	7.33	43.99
101	Advise Web personnel, PI&E & others via email	Secy	0.25	0.25	29.328	7.33	7.33
102	Post package on web, write listbot	AQII	1.00	1.00	52.676	52.68	52.68
103	Send listbot to world	ISS	1.00	1.00	46.631	46.63	46.63
104	Print copies of issuance package for transmittal	Repro	0.50	2.00	26.611	13.31	53.22
105	Mail package	Secy	1.00	1.00	29.328	29.33	29.33
106	Amend permit conditions in database	AQII	2.00	16.00	52.676	105.35	842.82
107	Invoice plant for public notice	AQII	2.00	2.00	52.676	105.35	105.35
108	Archive application	Secy	0.50	8.00	29.328	14.66	234.62
Total for All Initial Permit Issuance Tasks			418.10	866.90		21772.02	46348.14

Table 4b. Task-Based Analysis for Completion of an Administrative Amendment to an MFR Permit

	Personnel	Time	Time	Cost per	Resource	Resource	
		Estimate	Estimate	Employee	Estimate	Estimate	
		hrs	hrs	\$/hour	\$	\$	
		Low	High	FY 04/05	Low	High	
ISSUANCE							
1	Discussion w/applicant	AQII	1.00	1.00	52.676	52.68	52.68
2	Set up application, give to supervisor	Secy	0.25	0.50	29.328	7.33	14.66
3	Assign application	SPE	0.25	0.25	64.025	16.01	16.01
4	prepare revised Title V permit	AQII	1.00	4.00	52.676	52.68	210.70
5	Set up package of letters	Secy	2.00	2.00	29.328	58.66	58.66
6	Review and amend package	AQII	1.00	1.00	52.676	52.68	52.68
7	Review and amend package	SRE	1.00	1.00	58.084	58.08	58.08
8	Print package	Secy	0.50	0.50	29.328	14.66	14.66
9	Route proposal package-memo, entry in tracking spreadsheet	SRE	0.50	0.50	58.084	29.04	29.04
10	Signoff-Eng	AQII	0.10	0.25	52.676	5.27	13.17
11	Signoff-supervisor	SPE	0.25	0.25	64.025	16.01	16.01
12	Signoff-manager	Manager	0.00	0.25	67.236	0.00	16.81
13	Signoff-Title V supervisor	SPE	0.25	0.25	64.025	16.01	16.01
14	Signoff-Manager Permit Evaluation	Manager	0.25	0.25	67.236	16.81	16.81
15	Signoff-Director of Engineering	Director	0.25	0.25	81.718	20.43	20.43
16	Log package before transmittal out of division	AdSecy	0.10	0.25	33.956	3.40	8.49
17	Deliver package-mail	Clerk	0.10	0.10	26.611	2.66	2.66
18	Signoff-Legal	Counsel	0.25	0.25	91.741	22.94	22.94
19	Signoff-DAPCO	DAPCO	0.25	0.25	90.103	22.53	22.53
20	Signoff-APCO	APCO	0.25	0.25	98.41	24.60	24.60
21	Log package before transmittal to Engineering	AdSecy	0.10	0.25	33.956	3.40	8.49
22	Deliver package-mail	Clerk	0.10	0.10	26.611	2.66	2.66
23	Date letters	Secy	0.25	0.25	29.328	7.33	7.33
24	Revise dates in permit	Secy	0.50	0.50	29.328	14.66	14.66
25	Turn permit, letters into PDF	Secy	1.00	1.00	29.328	29.33	29.33
26	Send to EPA via EPSS system	Secy	0.25	1.50	29.328	7.33	43.99
27	Advise Permits Web personnel and others via email	Secy	0.25	0.25	29.328	7.33	7.33
28	Post package on web	AQII	0.75	0.75	52.676	39.51	39.51
29	Print copies of package for transmittal	Repro	0.50	2.00	26.611	13.31	53.22
30	Mail package	Secy	1.00	1.00	29.328	29.33	29.33
31	Amend permit conditions in database if necessary	AQII	1.00	1.00	52.676	52.68	52.68
Total for All Administrative Amendment Tasks			15.25	21.95		699.31	976.15

Table 4c. Task-Based Analysis for Completion of a Minor Revision to an MFR Permit

	Personnel	Time Estimate hrs Low	Time Estimate hrs High	Cost per Employee \$/hour FY 04/05	Resource Estimate \$ Low	Resource Estimate \$ High	
PROPOSAL							
1	Discussion w/applicant	AQII	1.00	16.00	52.676	52.68	842.82
2	Set up application, give to supervisor	Secy	0.25	0.50	29.328	7.33	14.66
3	Assign application	SPE	0.25	0.25	64.025	16.01	16.01
	Review application, send incomplete letters, generate invoice, write evaluation, prepare						
4	revised Title V permit	AQII	16.00	40.00	52.676	842.82	2107.04
5	Format permit	Secy	0.50	4.00	29.328	14.66	117.31
6	Supervisor review	SPE	4.00	4.00	64.025	256.10	256.10
7	Negotiation w/engineer	SPE	2.00	4.00	64.025	128.05	256.10
	Negotiation w/engineer	AQII	2.00	4.00	52.676	105.35	210.70
8	Revision based on supervisor review	AQII	2.00	8.00	52.676	105.35	421.41
9	Review by Title V lead	SRE	2.00	4.00	58.084	116.17	232.34
10	Negotiation w/engineer	SRE	2.00	2.00	58.084	116.17	116.17
	Negotiation w/engineer	AQII	2.00	2.00	52.676	105.35	105.35
11	Revision based on Title V lead review	AQII	2.00	8.00	52.676	105.35	421.41
12	Set up proposal package	Secy	2.00	4.00	29.328	58.66	117.31
13	Review proposal package	AQII	1.00	2.00	52.676	52.68	105.35
14	Review proposal package	SRE	1.00	2.00	58.084	58.08	116.17
15	Print proposal package	Secy	0.50	0.50	29.328	14.66	14.66
	Route proposal package-memo, entry in						
16	tracking spreadsheet	SRE	0.50	0.50	58.084	29.04	29.04
17	Signoff-Eng	AQII	0.25	0.50	52.676	13.17	26.34
18	Signoff-supervisor	SPE	0.50	0.50	64.025	32.01	32.01
19	Signoff-manager	Manager	0.00	4.00	67.236	0.00	268.94
20	Signoff-Title V supervisor	SPE	0.25	2.00	64.025	16.01	128.05
21	Signoff-Manager Permit Evaluation	Manager	1.00	4.00	67.236	67.24	268.94
22	Signoff-Director of Engineering	Director	1.00	4.00	81.718	81.72	326.87
23	Log package before transmittal out of division	Adsecy	0.10	0.25	33.956	3.40	8.49
24	Deliver package-mail	Clerk	0.10	0.10	26.611	2.66	2.66
25	Signoff-Legal	Counsel	1.00	4.00	91.741	91.74	366.96
26	Signoff-DAPCO	DAPCO	1.00	1.00	90.103	90.10	90.10
27	Signoff-APCO	APCO	1.00	1.00	98.41	98.41	98.41
28	Log package before transmittal to Engineering	Adsecy	0.25	0.25	33.956	8.49	8.49
29	Deliver package-mail	Clerk	0.10	0.10	26.611	2.66	2.66
30	Date letters	Secy	0.25	0.25	29.328	7.33	7.33
31	Generate EPSS transmittal form	SRE	0.25	0.25	58.084	14.52	14.52
	Turn permit, letters, reports, appendices into						
32	PDF	Secy	2.00	2.00	29.328	58.66	58.66
33	Scan documents	Secy	1.00	1.00	29.328	29.33	29.33
34	Send to EPA via EPSS system	Secy	0.25	1.50	29.328	7.33	43.99
	Advise Permits Web personnel, PI&E and						
35	others via email	Secy	0.25	0.25	29.328	7.33	7.33
36	Update database	Secy	0.50	1.00	29.328	14.66	29.33
37	Post package on web, write listbot	AQII	1.00	1.00	52.676	52.68	52.68
38	Send listbot to world	ISS	1.00	1.00	46.631	46.63	46.63
39	Print copies of proposal package for transmittal	Repro	0.50	2.00	26.611	13.31	53.22
40	Mail package	Secy	1.00	1.00	29.328	29.33	29.33
41	Respond to questions, accept comments	AQII	0.00	16.00	52.676	0.00	842.82
ISSUANCE							

	Personnel	Time Estimate hrs Low	Time Estimate hrs High	Cost per Employee \$/hour FY 04/05	Resource Estimate \$ Low	Resource Estimate \$ High
42 Prepare response to comments documents	AQII	0.00	16.00	52.676	0.00	842.82
43 Review and amend response to comments documents	SPE	0.00	4.00	64.025	0.00	256.10
44 Review and amend response to comments documents	SRE	0.00	4.00	58.084	0.00	232.34
45 Review and amend response to comments documents	Manager	0.00	4.00	67.236	0.00	268.94
46 Review and amend response to comments documents	Counsel	0.00	4.00	91.741	0.00	366.96
47 Prepare clean copy of permit	AQII	1.00	4.00	52.676	52.68	210.70
48 Prepare issuance package	Secy	2.00	2.00	29.328	58.66	58.66
49 Review issuance package, amend letters if necessary	AQII	0.50	2.00	52.676	26.34	105.35
50 Review issuance package, amend letters if necessary	SPE	0.50	2.00	64.025	32.01	128.05
51 Review issuance package, amend letters if necessary	SRE	1.00	1.00	58.084	58.08	58.08
52 Signoff-manager	Manager	0.00	1.00	67.236	0.00	67.24
53 Signoff-Title V supervisor	SPE	0.25	0.25	64.025	16.01	16.01
54 Signoff-Manager Permit Evaluation	Manager	1.00	2.00	67.236	67.24	134.47
55 Signoff-Director of Engineering	Director	1.00	2.00	81.718	81.72	163.44
56 Log package before transmittal out of division	Adsecy	0.10	0.25	33.956	3.40	8.49
57 Deliver package-mail	Clerk	0.10	0.10	26.611	2.66	2.66
58 Signoff-Legal	Counsel	1.00	4.00	91.741	91.74	366.96
59 Signoff-DAPCO	DAPCO	1.00	1.00	90.103	90.10	90.10
60 Signoff-APCO	APCO	1.00	1.00	98.41	98.41	98.41
61 Log package before transmittal to Engineering	Adsecy	0.25	0.25	33.956	8.49	8.49
62 Deliver package-mail	Clerk	0.10	0.10	26.611	2.66	2.66
63 Date letters	Secy	0.25	0.25	29.328	7.33	7.33
63 Revise dates in permit	Secy	0.50	0.50	29.328	14.66	14.66
64 Generate EPSS transmittal form	SRE	0.25	0.25	58.084	14.52	14.52
65 Turn permit, letters into PDF	Secy	1.00	1.00	29.328	29.33	29.33
66 Send to EPA via EPSS system	Secy	0.25	1.50	29.328	7.33	43.99
67 Advise Permits Web personnel, PI&E and others via email	Secy	0.25	0.25	29.328	7.33	7.33
68 Post package on web, write listbot	AQII	1.00	1.00	52.676	52.68	52.68
69 Send listbot to world	ISS	1.00	1.00	46.631	46.63	46.63
70 Print copies of issuance package for transmittal	Repro	0.50	2.00	26.611	13.31	53.22
71 Mail package	Secy	1.00	1.00	29.328	29.33	29.33
72 Amend permit conditions in database	AQII	1.00	8.00	52.676	52.68	421.41
73 Archive application	Secy	1.00	2.00	29.328	29.33	58.66
Total for All Minor Revision Tasks		74.35	228.40		3967.86	12610.08

Table 4d. Task-Based Analysis for Completion of a Significant Revision to an MFR Permit

PROPOSAL	Personnel	Time	Time	Cost per	Resource	Resource
		Estimate	Estimate	Employee	Estimate	Estimate
		hrs Low	hrs High	\$/hour FY 04/05	\$ Low	\$ High
1 Discussion w/applicant	AQII	1.00	1.00	52.676	52.68	52.68
2 Set up application, give to supervisor	Secy	0.25	0.50	29.328	7.33	14.66
3 Assign application	SPE	0.25	0.25	64.025	16.01	16.01
4 Review application, send incomplete letters, generate invoice, write evaluation, prepare revised Title V permit	AQII	40.00	160.00	52.676	2107.04	8428.16
5 Format permit	Secy	0.50	4.00	29.328	14.66	117.31
6 Supervisor review	SPE	4.00	24.00	64.025	256.10	1536.60
7 Negotiation w/engineer	SPE	2.00	16.00	64.025	128.05	1024.40
Negotiation w/engineer	AQII	2.00	16.00	52.676	105.35	842.82
8 Revision based on supervisor review	AQII	8.00	40.00	52.676	421.41	2107.04
9 Review by Title V lead	SRE	4.00	8.00	58.084	232.34	464.67
10 Negotiation w/engineer	SRE	2.00	8.00	58.084	116.17	464.67
Negotiation w/engineer	AQII	2.00	8.00	52.676	105.35	421.41
11 Revision based on Title V lead review	AQII	2.00	8.00	52.676	105.35	421.41
12 Set up proposal package inc public notice, library letter, call library if necessary, copy application if necessary	Secy	4.00	4.00	29.328	117.31	117.31
13 Review proposal package	AQII	1.00	1.00	52.676	52.68	52.68
14 Review proposal package	SRE	1.00	1.00	58.084	58.08	58.08
15 Print proposal package	Secy	0.50	2.00	29.328	14.66	58.66
16 Route proposal package-memo, entry in tracking spreadsheet	SRE	0.50	0.50	58.084	29.04	29.04
17 Signoff-Eng	AQII	0.25	0.25	52.676	13.17	13.17
18 Signoff-supervisor	SPE	0.50	0.50	64.025	32.01	32.01
19 Signoff-manager	Manager	0.00	4.00	67.236	0.00	268.94
20 Signoff-Title V supervisor	SPE	0.25	2.00	64.025	16.01	128.05
21 Signoff-Manager Permit Evaluation	Manager	1.00	4.00	67.236	67.24	268.94
22 Signoff-Director of Engineering	Director	1.00	4.00	81.718	81.72	326.87
23 Log package before transmittal out of division	AdSecy	0.10	0.25	33.956	3.40	8.49
24 Deliver package-mail	Clerk	0.10	0.10	26.611	2.66	2.66
25 Signoff-Legal	Counsel	1.00	8.00	91.741	91.74	733.93
26 Signoff-DAPCO	DAPCO	1.00	1.00	90.103	90.10	90.10
27 Signoff-APCO	APCO	1.00	1.00	98.41	98.41	98.41
28 Log package before transmittal to Engineering	Adsecy	0.25	0.25	33.956	8.49	8.49
29 Deliver package-mail	Clerk	0.10	0.10	26.611	2.66	2.66
30 Date letters	Secy	0.25	1.00	29.328	7.33	29.33
31 Generate EPSS transmittal form	SRE	0.25	0.25	58.084	14.52	14.52
32 Turn permit, letters, reports, appendices into PDF	Secy	2.00	2.00	29.328	58.66	58.66
33 Scan documents	Secy	1.00	1.00	29.328	29.33	29.33
34 Send to EPA via EPSS system	Secy	0.25	1.50	29.328	7.33	43.99
35 Send public notice to mailing list	Secy	2.00	2.00	29.328	58.66	58.66
36 Advise Permits Web personnel, PI&E and others via email	Secy	0.25	0.25	29.328	7.33	7.33
37 Update database	Secy	0.50	1.00	29.328	14.66	29.33
38 Post package on web, write listbot	AQII	1.00	1.00	52.676	52.68	52.68
39 Send listbot to world	ISS	1.00	1.00	46.631	46.63	46.63
40 Print copies of proposal package for transmittal	Repro	0.50	2.00	26.611	13.31	53.22

	Personnel	Time Estimate hrs Low	Time Estimate hrs High	Cost per Employee \$/hour FY 04/05	Resource Estimate \$ Low	Resource Estimate \$ High
41 Mail package	Secy	1.00	1.00	29.328	29.33	29.33
42 Write press release	PIO	0.00	2.00	46.631	0.00	93.26
43 Send to newspapers	PIO	0.00	1.00	46.631	0.00	46.63
44 Get purchase order number for pn	Secy	0.25	0.25	29.328	7.33	7.33
45 Assign purchase order number	ACC	0.25	0.25	38.363	9.59	9.59
46 Place ad	Secy	1.00	1.00	29.328	29.33	29.33
47 Respond to questions, accept comments	AQII	4.00	4.00	52.676	210.70	210.70
ISSUANCE						
48 Prepare response to comments documents	AQII	0.00	16.00	52.676	0.00	842.82
49 Review and amend response to comments documents	SPE	0.00	4.00	64.025	0.00	256.10
50 Review and amend response to comments documents	SRE	0.00	4.00	58.084	0.00	232.34
51 Review and amend response to comments documents	Manager	0.00	4.00	67.236	0.00	268.94
52 Review and amend response to comments documents	Counsel	0.00	4.00	91.741	0.00	366.96
53 Prepare clean copy of permit	AQII	2.00	4.00	52.676	105.35	210.70
54 Prepare issuance package	Secy	2.00	2.00	29.328	58.66	58.66
55 Review issuance package, amend letters if necessary	AQII	1.00	4.00	52.676	52.68	210.70
56 Review issuance package, amend letters if necessary	SPE	1.00	4.00	64.025	64.03	256.10
57 Review issuance package, amend letters if necessary	SRE	1.00	2.00	58.084	58.08	116.17
58 Signoff-manager	Manager	0.00	4.00	67.236	0.00	268.94
59 Signoff-Title V supervisor	SPE	0.25	2.00	64.025	16.01	128.05
60 Signoff-Manager Permit Evaluation	Manager	1.00	4.00	67.236	67.24	268.94
61 Signoff-Director of Engineering	Director	1.00	4.00	81.718	81.72	326.87
62 Log package before transmittal out of division	Adsecy	0.10	0.25	33.956	3.40	8.49
63 Deliver package-mail	Clerk	0.10	0.10	26.611	2.66	2.66
64 Signoff-Legal	Counsel	1.00	4.00	91.741	91.74	366.96
65 Signoff-DAPCO	DAPCO	1.00	1.00	90.103	90.10	90.10
66 Signoff-APCO	APCO	1.00	1.00	98.41	98.41	98.41
67 Log package before transmittal to Engineering	Adsecy	0.25	0.25	33.956	8.49	8.49
68 Deliver package-mail	Clerk	0.10	0.10	26.611	2.66	2.66
69 Date letters	Secy	0.25	0.25	29.328	7.33	7.33
Revise dates in permit	Secy	0.50	0.50	29.328	14.66	14.66
70 Generate EPSS transmittal form	SRE	0.25	0.25	58.084	14.52	14.52
71 Turn permit, letters into PDF	Secy	1.00	1.00	29.328	29.33	29.33
72 Send to EPA via EPSS system	Secy	0.25	1.50	29.328	7.33	43.99
73 Advise Permits Web personnel, PI&E and others via email	Secy	0.25	0.25	29.328	7.33	7.33
74 Post package on web, write listbot	AQII	1.00	1.00	52.676	52.68	52.68
75 Send listbot to world	ISS	1.00	1.00	46.631	46.63	46.63
76 Print copies of issuance package for transmittal	Repro	0.50	2.00	26.611	13.31	53.22
77 Mail package	Secy	1.00	1.00	29.328	29.33	29.33
78 Amend permit conditions in database	AQII	2.00	4.00	52.676	105.35	210.70
79 Invoice plant for public notice	AQII	2.00	2.00	52.676	105.35	105.35
80 Archive application	Secy	1.00	1.50	29.328	29.33	43.99
Total for All Significant Revision Tasks		120.85	435.15		6307.63	24109.34

Table 4e. Task-Based Analysis for Completion of a Reopening of an MFR Permit

	Personnel	Time	Time	Cost per	Resource	Resource	
		Estimate	Estimate	Employee	Estimate	Estimate	
		hrs	hrs	\$/hour	\$	\$	
		Low	High	FY 04/05	Low	High	
PROPOSAL							
1	Discussion w/applicant	AQII	1.00	8.00	52.676	52.68	421.41
2	Reopening letter to applicant	AQII	2.00	2.00	52.676	105.35	105.35
3	Set up application, give to supervisor	Secy	0.25	0.50	29.328	7.33	14.66
4	Assign application	SPE	0.25	0.25	64.025	16.01	16.01
5	write evaluation, prepare revised Title V permit	AQII	40.00	160.00	52.676	2107.04	8428.16
6	Format permit	Secy	0.50	4.00	29.328	14.66	117.31
7	Supervisor review	SPE	4.00	24.00	64.025	256.10	1536.60
8	Negotiation w/engineer	SPE	2.00	16.00	64.025	128.05	1024.40
	Negotiation w/engineer	AQII	2.00	16.00	52.676	105.35	842.82
9	Revision based on supervisor review	AQII	8.00	40.00	52.676	421.41	2107.04
	Review by Title V lead	SPE	4.00	8.00	64.025	256.10	512.20
10	Negotiation w/engineer	SPE	2.00	8.00	64.025	128.05	512.20
	Negotiation w/engineer	AQII	2.00	8.00	52.676	105.35	421.41
11	Revision based on Title V lead review	AQII	2.00	8.00	52.676	105.35	421.41
12	Set up proposal package inc public notice	Secy	2.00	2.00	29.328	58.66	58.66
13	Review proposal package	AQII	1.00	1.00	52.676	52.68	52.68
14	Review proposal package	SPE	1.00	1.00	64.025	64.03	64.03
15	Print proposal package	Secy	0.50	0.50	29.328	14.66	14.66
16	Route proposal package-memo, entry in tracking spreadsheet	SPE	0.50	0.50	64.025	32.01	32.01
17	Signoff-Eng	AQII	0.25	0.25	52.676	13.17	13.17
18	Signoff-supervisor	SPE	0.50	0.50	64.025	32.01	32.01
19	Signoff-manager	Manager	0.00	4.00	67.236	0.00	268.94
20	Signoff-Title V supervisor	SPE	0.25	0.25	64.025	16.01	16.01
21	Signoff-Manager Permit Evaluation	Manager	1.00	4.00	67.236	67.24	268.94
22	Signoff-Director of Engineering	Director	1.00	4.00	81.718	81.72	326.87
23	Log package before transmittal out of division	Adsecy	0.10	0.25	33.956	3.40	8.49
24	Deliver package-mail	Clerk	0.10	0.10	26.611	2.66	2.66
25	Signoff-Legal	Counsel	1.00	8.00	91.741	91.74	733.93
26	Signoff-DAPCO	DAPCO	1.00	1.00	90.103	90.10	90.10
27	Signoff-APCO	APCO	1.00	1.00	98.41	98.41	98.41
28	Log package before transmittal to Engineering	Adsecy	0.25	0.25	33.956	8.49	8.49
29	Deliver package-mail	Clerk	0.10	0.10	26.611	2.66	2.66
30	Date letters	Secy	0.25	0.25	29.328	7.33	7.33
31	Generate EPSS transmittal form	SPE	0.25	0.25	64.025	16.01	16.01
32	Turn permit, letters, reports, appendices into PDF	Secy	2.00	2.00	29.328	58.66	58.66
33	Scan documents	Secy	1.00	1.00	29.328	29.33	29.33
34	Send to EPA via EPSS system	Secy	0.25	1.50	29.328	7.33	43.99
35	Send public notice to mailing list	Secy	2.00	2.00	29.328	58.66	58.66
36	Advise Permits Web personnel, PI&E and others via email	Secy	0.25	0.25	29.328	7.33	7.33
37	Update database	Secy	0.50	1.00	29.328	14.66	29.33
38	Post package on web, write listbot	AQII	1.00	1.00	52.676	52.68	52.68
39	Send listbot to world	ISS	1.00	1.00	46.631	46.63	46.63
40	Print copies of proposal package for transmittal	Repro	0.50	2.00	26.611	13.31	53.22
41	Mail package	Secy	1.00	1.00	29.328	29.33	29.33
42	Write press release	PIO	0.00	2.00	46.631	0.00	93.26

	Personnel	Time Estimate hrs Low	Time Estimate hrs High	Cost per Employee \$/hour FY 04/05	Resource Estimate \$ Low	Resource Estimate \$ High	
43	Send to newspapers	PIO	0.00	1.00	46.631	0.00	46.63
44	Get purchase order number for pn	Secy	0.25	0.25	29.328	7.33	7.33
45	Assign purchase order number	ACC	0.25	0.25	38.363	9.59	9.59
46	Place ad	Secy	1.00	1.00	29.328	29.33	29.33
47	Respond to questions, accept comments	AQII	0.00	8.00	52.676	0.00	421.41
ISSUANCE							
48	Prepare response to comments documents	AQII	0.00	40.00	52.676	0.00	2107.04
49	Review and amend response to comments documents	SPE	0.00	4.00	64.025	0.00	256.10
50	Review and amend response to comments documents	SRE	0.00	4.00	58.084	0.00	232.34
51	Review and amend response to comments documents	Manager	0.00	4.00	67.236	0.00	268.94
52	Review and amend response to comments documents	Counsel	0.00	12.00	91.741	0.00	1100.89
53	Prepare clean copy of permit	AQII	2.00	4.00	52.676	105.35	210.70
54	Prepare issuance package	Secy	2.00	2.00	29.328	58.66	58.66
55	Review issuance package, amend letters if necessary	AQII	1.00	4.00	52.676	52.68	210.70
56	Review issuance package, amend letters if necessary	SPE	1.00	4.00	64.025	64.03	256.10
57	Review issuance package, amend letters if necessary	SRE	1.00	2.00	58.084	58.08	116.17
58	Signoff-manager	Manager	1.00	4.00	67.236	67.24	268.94
59	Signoff-Title V supervisor	SPE	0.25	2.00	64.025	16.01	128.05
60	Signoff-Manager Permit Evaluation	Manager	1.00	4.00	67.236	67.24	268.94
61	Signoff-Director of Engineering	Director	1.00	4.00	81.718	81.72	326.87
62	Log package before transmittal out of division	Adsecy	0.10	0.25	33.956	3.40	8.49
63	Deliver package-mail	Clerk	0.10	0.10	26.611	2.66	2.66
64	Signoff-Legal	Counsel	1.00	1.00	91.741	91.74	91.74
65	Signoff-DAPCO	DAPCO	1.00	1.00	90.103	90.10	90.10
66	Signoff-APCO	APCO	1.00	1.00	98.41	98.41	98.41
67	Log package before transmittal to Engineering	Adsecy	0.25	0.25	33.956	8.49	8.49
68	Deliver package-mail	Clerk	0.10	0.10	26.611	2.66	2.66
69	Date letters	Secy	0.25	0.25	29.328	7.33	7.33
	Revise dates in permit	Secy	0.50	0.50	29.328	14.66	14.66
70	Generate EPSS transmittal form	SPE	0.25	0.25	64.025	16.01	16.01
71	Turn permit, letters into PDF	Secy	1.00	1.00	29.328	29.33	29.33
72	Send to EPA via EPSS system	Secy	0.25	1.50	29.328	7.33	43.99
73	Advise Permits Web personnel, PI&E and others via email	Secy	0.25	0.25	29.328	7.33	7.33
74	Post package on web, write listbot	AQII	1.00	1.00	52.676	52.68	52.68
75	Send listbot to world	ISS	1.00	1.00	46.631	46.63	46.63
76	Print copies of issuance package for transmittal	Repro	0.50	2.00	26.611	13.31	53.22
77	Mail package	Secy	1.00	1.00	29.328	29.33	29.33
78	Amend permit conditions in database	AQII	1.00	4.00	52.676	52.68	210.70
79	Invoice plant for public notice	AQII	2.00	2.00	52.676	105.35	105.35
80	Archive application	Secy	1.00	1.00	29.328	29.33	29.33
Total for all Reopening Tasks			116.85	470.65		6205.71	26372.64

Table 4f. Task-Based Analysis for Completion of a Renewal of an MFR Permit

	Personnel	Time Estimate hrs Low	Time Estimate hrs High	Cost per Employee \$/hour FY 04/05	Resource Estimate \$ Low	Resource Estimate \$ High	
INTERNAL REVIEW							
1	Discussion w/applicant	AQII	1.00	4.00	52.676	52.68	210.70
2	Set up application, give to supervisor	Secy	0.25	0.50	29.328	7.33	14.66
3	Assign application	SPE	0.25	0.25	64.025	16.01	16.01
4	Review application, send incomplete letters, generate invoice, write evaluation/SOB, prepare revised Title V permit, consider CAM, new NESHAPS	AQII	40.00	100.00	52.676	2107.04	5267.60
5	Supervisor review	SPE	8.00	16.00	64.025	512.20	1024.40
6	Format permit	Secy	0.50	16.00	29.328	14.66	469.25
7	Negotiation w/engineer	SPE	4.00	8.00	64.025	256.10	512.20
	Negotiation w/engineer	AQII	4.00	8.00	52.676	210.70	421.41
8	Revision based on supervisor review	AQII	8.00	24.00	52.676	421.41	1264.22
9	Review by Title V lead	SRE	8.00	8.00	58.084	464.67	464.67
10	Negotiation w/engineer	SRE	4.00	8.00	58.084	232.34	464.67
	Negotiation w/engineer	AQII	4.00	8.00	52.676	210.70	421.41
11	Revision based on Title V lead review	AQII	2.00	16.00	52.676	105.35	842.82
12	Write internal review memo, enter on tracking ss, request compliance report fr Enf	SRE	0.50	0.50	58.084	29.04	29.04
13	Signoff-Eng	AQII	0.25	0.25	52.676	13.17	13.17
14	Signoff-supervisor	SPE	0.50	0.50	64.025	32.01	32.01
15	Signoff-manager	Manager	0.00	4.00	67.236	0.00	268.94
16	Signoff-Title V supervisor	SPE	0.25	2.00	64.025	16.01	128.05
17	Signoff-Manager Permit Evaluation	Manager	4.00	4.00	67.236	268.94	268.94
18	Signoff-Director of Engineering, transmittal to secy	Director	4.00	4.00	81.718	326.87	326.87
19	Request for copies	Secy	0.00	0.50	29.328	0.00	14.66
20	Print copies of package for transmittal	Repro	0.75	2.00	26.611	19.96	53.22
21	Transmittal to Divisions, applicant	Secy	2.00	2.00	29.328	58.66	58.66
22	Review by Legal	Counsel	1.00	4.00	91.741	91.74	366.96
23	Enforcement handling	Secy	7.50	7.50	29.328	219.96	219.96
24	Review by Enforcement	INS	100.00	100.00	43.342	4334.20	4334.20
25	Review by Enforcement	SINS	80.00	80.00	52.676	4214.08	4214.08
26	Review by Enforcement	ESP	2.00	2.00	60.983	121.97	121.97
27	Review by Enforcement	Manager	40.00	40.00	67.236	2689.44	2689.44
28	Review by Enforcement	Director	1.00	1.00	81.718	81.72	81.72
29	Compliance report preparation	INS	8.00	8.00	43.342	346.74	346.74
30	Compliance report review	SINS	1.00	1.00	52.676	52.68	52.68
31	Compliance report review	ESP	1.00	1.00	60.983	60.98	60.98
32	Compliance report review	Manager	1.00	1.00	67.236	67.24	67.24
33	Compliance report review	Director	1.00	1.00	81.718	81.72	81.72
34	Review by Source Test	AQII	12.00	12.00	52.676	632.11	632.11
35	Source test report of tests, etc. during permit term	AQII	0.00	16.00	52.676	0.00	842.82
36	Respond to questions, accept comments	AQII	4.00	20.00	52.676	210.70	1053.52
37	Revise permit to respond to comments	AQII	2.00	16.00	52.676	105.35	842.82
38	Review response to comments	SPE	1.00	8.00	64.025	64.03	512.20
39	Review response to comments	SRE	1.00	4.00	58.084	58.08	232.34
PUBLIC NOTICE							

	Personnel	Time Estimate hrs Low	Time Estimate hrs High	Cost per Employee \$/hour FY 04/05	Resource Estimate \$ Low	Resource Estimate \$ High
40	Secy	4.00	4.00	29.328	117.31	117.31
Set up proposal package inc public notice, library letter, call library if necessary, copy application if necessary						
41	Secy	0.50	4.00	29.328	14.66	117.31
42	AQII	2.00	2.00	52.676	105.35	105.35
43	SRE	2.00	2.00	58.084	116.17	116.17
44	Secy	0.50	2.00	29.328	14.66	58.66
45	SRE	0.50	0.50	58.084	29.04	29.04
Route proposal package-memo, entry in tracking spreadsheet (letters, permit, sob)						
46	AQII	0.25	0.25	52.676	13.17	13.17
47	SPE	0.50	0.50	64.025	32.01	32.01
48	Manager	0.00	4.00	67.236	0.00	268.94
49	SPE	0.25	2.00	64.025	16.01	128.05
50	Manager	4.00	4.00	67.236	268.94	268.94
51	Director	4.00	4.00	81.718	326.87	326.87
52	Adsecy	0.25	0.25	33.956	8.49	8.49
53	Clerk	0.10	0.10	26.611	2.66	2.66
54	Counsel	1.00	4.00	91.741	91.74	366.96
55	DAPCO	0.50	1.00	90.103	45.05	90.10
56	APCO	0.50	1.00	98.41	49.21	98.41
57	Adsecy	0.10	0.25	33.956	3.40	8.49
58	Clerk	0.10	0.10	26.611	2.66	2.66
59	Secy	0.25	0.25	29.328	7.33	7.33
60	SRE	0.25	0.25	58.084	14.52	14.52
61	Secy	1.00	2.00	29.328	29.33	58.66
Turn permit, letters, reports, appendices into PDF						
62	Secy	1.00	1.00	29.328	29.33	29.33
63	Secy	0.25	1.50	29.328	7.33	43.99
64	Secy	2.00	2.00	29.328	58.66	58.66
65	Secy	0.25	0.25	29.328	7.33	7.33
Advise Permits Web personnel, PI&E and others via email						
66	Secy	0.50	1.00	29.328	14.66	29.33
67	AQII	1.00	1.00	52.676	52.68	52.68
68	ISS	1.00	1.00	46.631	46.63	46.63
69	Repro	0.50	2.00	26.611	13.31	53.22
70	Secy	1.00	1.00	29.328	29.33	29.33
71	PIO	2.00	2.00	46.631	93.26	93.26
72	PIO	1.00	1.00	46.631	46.63	46.63
73	Secy	0.25	0.25	29.328	7.33	7.33
74	ACC	0.25	0.25	38.363	9.59	9.59
75	Secy	1.00	1.00	29.328	29.33	29.33
76	AQII	2.00	16.00	52.676	105.35	842.82
ISSUANCE						
77	AQII	0.00	40.00	52.676	0.00	2107.04
78	SPE	0.00	16.00	64.025	0.00	1024.40
Prepare response to comments documents						
79	SRE	0.00	16.00	58.084	0.00	929.34
Review and amend response to comments documents						
80	Manager	0.00	4.00	67.236	0.00	268.94
Review and amend response to comments documents						
81	Counsel	0.00	12.00	91.741	0.00	1100.89
Review and amend response to comments documents						

	Personnel	Time Estimate hrs Low	Time Estimate hrs High	Cost per Employee \$/hour FY 04/05	Resource Estimate \$ Low	Resource Estimate \$ High
82 Prepare clean copy of permit	AQII	2.00	8.00	52.676	105.35	421.41
83 Prepare issuance package	Secy	2.00	2.00	29.328	58.66	58.66
84 Review issuance package, amend letters if necessary	AQII	0.50	4.00	52.676	26.34	210.70
85 Review issuance package, amend letters if necessary	SPE	0.50	4.00	64.025	32.01	256.10
86 Review issuance package, amend letters if necessary	SRE	0.50	2.00	58.084	29.04	116.17
87 Signoff-manager	Manager	1.00	4.00	67.236	67.24	268.94
88 Signoff-Title V supervisor	SPE	0.25	2.00	64.025	16.01	128.05
89 Signoff-Manager Permit Evaluation	Manager	1.00	4.00	67.236	67.24	268.94
90 Signoff-Director of Engineering	Director	1.00	4.00	81.718	81.72	326.87
91 Log package before transmittal out of division	Adsecy	0.10	0.25	33.956	3.40	8.49
92 Deliver package-mail	Clerk	0.10	0.10	26.611	2.66	2.66
93 Signoff-Legal	Counsel	0.50	1.00	91.741	45.87	91.74
94 Signoff-DAPCO	DAPCO	0.50	1.00	90.103	45.05	90.10
95 Signoff-APCO	APCO	0.50	1.00	98.41	49.21	98.41
96 Log package before transmittal to Engineering	Adsecy	0.25	0.25	33.956	8.49	8.49
97 Deliver package-mail	Clerk	0.10	0.10	26.611	2.66	2.66
98 Date letters	Secy	0.25	0.25	29.328	7.33	7.33
99 Revise dates in permit	Secy	0.50	0.50	29.328	14.66	14.66
100 Generate EPSS transmittal form	SRE	0.25	0.25	58.084	14.52	14.52
101 Turn permit, letters into PDF	Secy	1.00	1.00	29.328	29.33	29.33
102 Send to EPA via EPSS system	Secy	0.25	1.50	29.328	7.33	43.99
103 Advise Permits Web personnel, PI&E and others via email	Secy	0.25	0.25	29.328	7.33	7.33
104 Post package on web, write listbot	AQII	1.00	1.00	52.676	52.68	52.68
105 Send listbot to world	ISS	1.00	1.00	46.631	46.63	46.63
106 Print copies of issuance package for transmittal	Repro	0.50	2.00	26.611	13.31	53.22
107 Mail package	Secy	1.00	1.00	29.328	29.33	29.33
108 Amend permit conditions in database	AQII	2.00	16.00	52.676	105.35	842.82
109 Invoice plant for public notice	AQII	2.00	2.00	52.676	105.35	105.35
110 Archive application	Secy	0.50	8.00	29.328	14.66	234.62
Total for All Renewal Permit Tasks		417.60	789.15		21756.67	42231.49

Table 5. Summary of Task-Based Staff Resources Analyses for On-Going MFR Activities

	Average Staff Resource Costs
Enforcement	
Tracking reports	\$ 28,170
Review monitoring reports	\$ 365,040
Annual certification reviews	\$ 297,390
EPA reporting	\$ 10,208
Review deviation reports	\$ 216,612
Subtotal Enforcement	\$ 917,420
Legal	
Appeals	\$ 87,893
Subtotal Legal	\$ 87,893
Total On-Going Costs	\$ 1,005,313

Tables 6a-e. CALCULATIONS FOR NEW SCHEDULE P APPLICATION FEES

Table 6a. Staff Cost Estimates (based on task lists) and Projected Application Activity (based on historical averages)

	Staff Cost Estimates			Projections For FY 04/05			
	Per Application Type			Number of Applications	Number of Sources	Average Srce / App	Permit Shields
	Low	Average	High				
Administrative Amendments	\$ 699	\$ 838	\$ 976	6	0		0
Minor Revisions (75%)	\$ 3,968	\$ 8,289	\$ 12,610	126	346	2.7	0
Significant Revisions (25%)	\$ 6,308	\$ 15,208	\$ 24,109	42	115	2.7	1
Reopenings	\$ 6,206	\$ 16,289	\$ 26,373	3	27	9.0	0
Renewals	\$ 21,757	\$ 31,994	\$ 2,231	18	657	36.5	6
Initial Permits	\$ 21,772	\$ 34,060	\$ 6,348	1	17	17.0	0
Total for FY 04/05				196	1162	5.9	7

Table 6b. Projected Staff Costs Based on Cost per Application Type

	Apps / Year	Low Cost / App	Average Cost / App	High Cost / App	Low Cost / Year	Average Cost / Year	High Cost / Year
Administrative Amendments	6	\$ 699	\$ 838	\$ 976	\$ 4,196	\$ 5,026	\$ 5,857
Minor Revisions	126	\$ 3,968	\$ 8,289	\$ 12,610	\$ 499,950	\$ 1,044,410	\$ 1,588,870
Significant Revisions	42	\$ 6,308	\$ 15,208	\$ 24,109	\$ 264,920	\$ 638,756	\$ 1,012,592
Reopenings	3	\$ 6,206	\$ 16,289	\$ 26,373	\$ 18,617	\$ 48,868	\$ 79,118
Renewals	18	\$ 21,757	\$ 31,994	\$ 42,231	\$ 391,620	\$ 575,893	\$ 760,167
Initial Permits	1	\$ 21,772	\$ 34,060	\$ 46,348	\$ 21,772	\$ 34,060	\$ 46,348
Total for FY 04/05	196				\$ 1,201,076	\$ 2,347,014	\$ 3,492,951

Table 6c. Fees Needed to Achieve Cost Recovery Based on Average Units (Applications or Sources) per Application

	Average Cost / Year	Filing Fees (1)	Permit Shield Fees (2)	Remaining Costs	Applications / Year	Sources / Year	Remaining Cost/Unit
MFR Administrative Amendment Fee	\$ 5,026	\$ 1,554	\$ -	\$ 3,472	6		\$ 578.73
MFR Minor Revision Fee	\$1,044,410	\$ 32,634	\$ -	\$1,011,776		346	\$ 2,924.21
MFR Significant Revision Fee	\$ 638,756	\$ 10,878	\$ 386	\$ 627,492		115	\$ 5,456.45
MFR Reopening Fee	\$ 48,868	\$ 777	\$ -	\$ 48,091		27	\$ 1,781.13
MFR Renewal Fee	\$ 575,893	\$ 4,662	\$ 2,316	\$ 568,915		657	\$ 865.93
MFR Initial Permit Fee	\$ 34,060	\$ 259	\$ -	\$ 33,801		17	\$ 1,988.30

(1) The MFR Filing Fee will be equal to the District's standard filing fee of \$259 for FY04/05.

(2) The MFR Permit Shield Fee will be equal to the current Permit Shield Fee of \$386.

Table 6d. Determination of Proportional Adjustment Factor for Application Based Fees

Average Annual Staff Costs for Application Activity:	\$ 2,347,014
Budget Target for Revenue From Title V Permit Applications:	\$ 342,000
Budget Target Compared to Application Activity Costs:	14.57%
Budget Target Minus Filing and Permit Shield Fees:	\$ 288,534
Adjustment Factor for Other MFR Fees:	12.57%

Table 6e. Calculation of Schedule P Fees for Application Activities

Cost Per Application	Average	Rounded Up
MFR Filing Fee	\$ 259.00	\$ 259.00
MFR Administrative Amendment Fee	\$ 72.72	\$ 73.00
Cost Per Source	Average	
MFR Minor Revision Fee	\$ 367.44	\$ 368.00
MFR Significant Revision Fee	\$ 685.63	\$ 686.00
MFR Reopening Fee	\$ 223.81	\$ 224.00
MFR Renewal Fee	\$ 108.81	\$ 109.00
MFR Initial Permit Fee	\$ 249.84	\$ 250.00
MFR Permit Shield Fee	\$ 386.00	\$ 386.00

- (1) The MFR Filing Fee will be equal to the District's standard filing fee of \$259 for FY04/05.
- (2) The MFR Permit Shield Fee will be equal to the current Permit Shield Fee of \$386.
- (3) All other MFR Fees are equal to the 12.6% adjustment factor times the Remaining Cost Per Unit (\$/Application or \$/Source).

Table 7. Projected Revenue From Schedule P, Title V and Synthetic Minor Fees

	Budgeted 04/05	Projected Average Year
Annual Fees	\$ 1,248,000	\$ 1,250,720
Application Fees	\$ 342,000	\$ 342,033
Total Title V Fees	\$ 1,590,000	\$ 1,592,753
Potential Variation:	+ / -	\$ 156,500

Table 7a. Projected MFR / Synthetic Minor Annual Fees

	No. of Sites	No. of Sources	Emissions, tons/year of PONSCO	No. of Monitors	Source Fees	Emissions Fees	Monitor Fees	Total Fees
Synthetic Minor	32	798	1386.2	23	\$ -	\$ -	\$ 42,734	\$ 42,734
Title V	91	3286	56872.6	127	\$ 611,196	\$ 416,307	\$ 235,966	\$ 1,263,469
Total Annual Fees (current sources, emissions, monitors at new fee rates)					\$ 611,196	\$ 416,307	\$ 278,700	\$ 1,306,203
Projected Title V Annual Fees for a High Year (current sources, emissions, monitors at new fee rates):								\$ 1,306,203
Projected Title V Annual Fees for an Average Year (3240 sources, 53000 tons/year, and 140 monitors):								\$ 1,250,720
Projected Title V Annual Fees for a Low Year (10% reduction in emissions and number of sources and monitors):								\$ 1,175,583

Table 7b. Projected MFR / Synthetic Minor Application Fees

	No. of Sites	No. of Applications	No. of Affected Sources	No. of Permit Shields	Filing Fees	Per Application Fees	Per Source Fees	Permit Shield Fees	Total Fees
Synthetic Minor - Initial Permit	0	0	0	0	\$ -	\$ -	\$ -	\$ -	\$ -
Synthetic Minor – Revisions	0	0	0	0	\$ -	\$ -	\$ -	\$ -	\$ -
MFR - Initial Permit	1	1	17	0	\$ 259	\$ -	\$ 4,250	\$ -	\$ 4,509
MFR - Administrative Amendment	6	6	0	0	\$ 1,554	\$ 438	\$ -	\$ -	\$ 1,992
MFR - Minor Revision	48	126	346	0	\$ 32,634	\$ -	\$ 127,328	\$ -	\$ 159,962
MFR - Significant Revision	16	42	115	1	\$ 10,878	\$ -	\$ 78,890	\$ 386	\$ 90,154
MFR – Reopening	3	3	27	0	\$ 777	\$ -	\$ 6,048	\$ -	\$ 6,825
MFR – Renewal	18	18	657	6	\$ 4,662	\$ -	\$ 71,613	\$ 2,316	\$ 78,591
Total Title V Application Fees for an Average Year:					\$ 50,764	\$ 438	\$ 288,129	\$ 2,702	\$ 342,033

Table 7c. Year to Year Variation in Renewal Applications

Projection for 04/05 Renewals (Low Year)	11	11	225	0	\$ 2,849	\$ -	\$ 24,525	\$ -	\$ 27,374
Projection for 07/08 Renewals (High Year)	28	28	1857	0	\$ 7,252	\$ -	\$ 202,413	\$ -	\$ 209,665