

# Permitting Fee Comparisons

PA DEP AQTAC Meeting

Feb 8, 2018

# Comparison Among State Air Permitting Fees Installation Permits

[All figures in \$]

State	Major*	Non-Major	Major Mod	Minor Mod	Comment
PA	40,000	7500	2500	1500	From 12/14/17 AQTAC**
IN	7500	4375	7500	625	
MD	20,500	1500	-	-	
MI	Zero	Zero	-	-	
NJ	<50,000	2527	8417	842	Combined PTI/Title V Fee per equipment unit
NY	11,000	2000	-	-	Combined PTI/Title V Fee per emission point
OH	<9000	>200	<1000	>100	Fee based on capacity
VA	69,300	5500	11,000	2750	
WV	12,000	1000	6000	-	

\*Assumes complex source: PSD/MACT/NSPS.

\*\* Proposed, using Option 2.

# Comparison Among State Air Permitting Fees Operating Permits

[All figures in \$]

	Major	Minor	Mods	Base/ Year	/Ton	T Max	\$ Max	Comment
PA	5000	1500	3000	5000	110	4000*	440,000*	12/14/17AQ TAC
IN	7500	4375	same	1875	50	4000*	251,875	Facility Cap
MD	w PTI	w PTI	-	5000	58	N/A	N/A	No caps
MI	Zero	Zero	Zero	5250	51	6100	312,015	Facility Cap
NJ	w PTI	w PTI	-	3000	120	4000*	480,000*	
NY	w PTI	w PTI	-	2500	90	7000*	630,000*	
OH	<9000	>200	<9000	3350	50	4000*	200,000*	
VA	38,500	11,000	4400	23,389	84	4000*	336,000*	
WV	<11,000	1000	5000	10,000	50	4000*	200,000*	

\* Per pollutant

# Comparison for a Major Source

## [Through Initial Year of Operation]

	INITIAL PTI + Title V (\$) *	ANNUAL (\$) **	INITIAL YEAR TOTAL(\$)
PA	45,000	665,000	710,000
IN	7,500	150,000	157,500
MD	20,500	353,000	373,500
MI	Zero	311,250	311,250
NJ	53,000	723,000	776,000
NY	11,000	542,500	553,500
OH	18,000	303,350	321,350
VA	107,800	527,389	635,189
WV	22,000	310,000	332,000

\*Installation Permit +Title V: Complex Source

\*\*2000 TPY x 3 Pollutants

# Some Common Uncommon Features

- No 2 states adopt the same format
  - Hard to compare
  - Indiana: 47 separate categories/fees
  - Almost as complex as the tax codes!
- Installation permits
  - By facility
  - By number of emission points/sources
  - By complexity; stacked
  - Combined with Permit to Operate
- Annual Fees
  - Usually capped , at least by pollutant (4000 tpy typical)
  - Firm Cap ( Indiana) vs No Cap(MD) vs High Cap ( NY)