

State of Delaware

Department of Natural
Resources and
Environmental Control

Division of Air Quality



*Annual
Title V Fee
Committee
Status Report*

Calendar
Year
2017

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This report meets the requirements of 7 Del. C. Chapter 60, Subchapter VIII, Section 6097(l)

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Introduction

Title V is an air pollution control program, based in federal law, designed to standardize air quality permits and the permitting process for major sources of air emissions across the country. The name "Title V" comes from Title V of the 1990 Federal Clean Air Act Amendments, which required that the U.S. Environmental Protection Agency (EPA) establish a national operating permit program. Accordingly, EPA adopted regulations [Title 40 of the Code of Federal Regulations, Chapter 1, Part 70 (Part 70)] which required states and local permitting authorities to develop and submit a federally enforceable operating permit program for EPA approval. As a result, the State of Delaware developed 7 DE Admin. Code 1130.

Section 502(b) of the 1990 Clean Air Act Amendments requires that all sources subject to the permitting requirements under Title V of the 1990 Clean Air Act Amendments pay an annual fee, sufficient to cover all reasonable (direct and indirect) costs required to develop and administer the permit program. These requirements were incorporated into 7 *Del. C.* Chapter 60, Subchapter VIII. These fees must be reviewed periodically (currently every three years) before the authorization expires to consider adjustments. In the State of Delaware, these annual fees cover both "Major Sources" and "Synthetic Minor" sources. EPA defines a Major Source as a facility that emits, or has the potential to emit (PTE) any criteria pollutant or hazardous air pollutant (HAP) at levels equal to or greater than the Major Source Thresholds (MST). The MST for criteria pollutants may vary depending on the attainment status and non-attainment classification (e.g. moderate, serious, severe, extreme) of the geographic area in which the facility is located. Sources may also elect to take voluntary limits to reduce their PTE to below the MST. These sources are called Synthetic Minor sources.

The Title V revenue is intended to ensure a stable level of support for the technically complex activities undertaken by the Department of Natural Resources and Environmental Control (DNREC or the Department) to ensure both protection of human health and the environment and a reasonable level of service to customers seeking permits and other services. The services provided by the Department supported wholly or partially by this Title V fee revenue are summarized in a later section of this report called "Program Accomplishments" and include:

- Permitting activities;
- Compliance activities;
- Enforcement activities;
- Planning activities;
- Emission inventory activities;
- Air monitoring activities;
- Small Business Ombudsman activities; and
- Other special projects/accomplishments.

These activities and the fees required to support this work are consistent with the EPA guidance for Title V programs. This report is intended to provide a reasonable amount of accountability for those activities and the fees assessed.

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Title V Fee Committee

Delaware Statute established the Title V Operating Permit Program Advisory Committee¹ (also known as the Title V Fee Committee herein) and specified that the membership of this committee include certain emitting business interests as well as members of the public and non-governmental organizations. The purpose or charter of the Title V Fee Committee is to assess whether the fees collected pursuant to 7 *Del. C.* Chapter 60, Subchapter VIII are adequate to ensure the effective implementation of the Program and to make recommendations to remedy or improve any deficiencies or elements of the Program.

The Title V Fee Committee, by working together, has expanded its scope to include renegotiating the Title V fee structure periodically prior to expiration to ensure that the financial needs of the Division of Air Quality (DAQ) and other Title V requirements are being met while the payment burden is distributed fairly across the Major Source and Synthetic Minor facilities. Over the past few fee cycles the Committee established revenue requirements based on DAQ's Full Time Employee (FTE) restrictions established by personnel hiring caps. These personnel restrictions then set the basis for the total Title V revenue that needs to be collected annually for the subsequent three year fee cycle. Once the revenue target is set, the Title V Fee Committee works with the Major and Synthetic Minor Sources to determine how the fees will be distributed fairly.

The current Title V Fee Schedule for 2018-2020, which was supported by the Title V Fee Committee, was presented to the Delaware General Assembly through Senate Bill 103. It was passed by the Senate on June 8, 2017, passed by the House on June 30, 2017, and was signed by the Governor on July 17, 2017. This Title V Fee Schedule applies to Calendar Years 2018, 2019, and 2020. It can be found in 7 *Del. C.* Chapter 60, Subchapter VIII and is available at: <http://delcode.delaware.gov/title7/c060/sc08/index.shtml>.

The Title V Fee Committee met three times in 2017:

- March 20, 2017: The Committee reviewed the final Management Review Project Report and continued the discussion regarding the development of the fee schedule for the 2018-2020 fee cycle.
- April 7, 2017: The Committee reviewed the action items related to the Management Review Project Report and continued their discussion related to program revenue, fees and legislative revisions for the upcoming 2018-2020 fee cycle.

¹ 7 *Del. C.* Chapter 60, Subchapter VIII § 6099 requires that the Committee "...include, but not be limited to, the Secretary of the Department of Natural Resources and Environmental Control, or the Secretary's duly appointed designee; the Director of the Division of Air Quality, or the Director's duly appointed designee; 2 members who will represent stationary sources; 1 to be a member of the Chemical Industry Council; a member of the Delaware State Chamber of Commerce; a member representing a public utility; 2 members of a nationally affiliated or state environmental advocacy group; and the chairpersons of the House and the Senate Natural Resource Committees. The Secretary of the Department of Natural Resources and Environmental Control shall serve as the Chair of this Committee."

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- May 12, 2017: The Committee concluded their review and discussion of the Management Review Project Report. Additionally, the Committee finalized the 2018-2020 fee cycle legislation and agreed to submit the proposed legislation to the General Assembly.

The materials from each of these meetings are available for review at:
<http://www.dnrec.delaware.gov/Air/Pages/Title-V-Fee-Committee-Information.aspx>.

Billing

The Title V bills for Calendar Year 2017 were mailed in January 2017. Facilities can choose to pay their bill in one payment or in quarterly payments. If the facility chooses to pay their bill in one payment, it is due by February 15th. If the facility chooses to pay their bill in quarterly payments, the payments are due on February 15th, May 15th, August 15th, and November 15th. If a facility does not pay their bill, they will be sent three reminders. The third reminder is sent certified mail. If, after the third reminder, the facility still does not pay their bill, enforcement action may be taken. Any delinquent source shall be subject to a 2% compounding monthly interest rate for each month overdue. Furthermore, consistent with the legislation, the Department has the authority to revoke a Title V permit on the sole basis that the annual fee has not been paid.

Overall Program Costs

See Table 1 for a summary breakdown of Calendar Year 2017 Title V Costs.

Table 1: 2017 Title V Costs

Salary	\$2,342,707.38
Travel	\$15,278.83
Contractual ²	\$476,337.97
Supplies	\$100,699.63
Capital Outlay	0.00
Additional Support Services ³	\$209,109.35
Small Business Ombudsman Program ⁴	\$88,697.04
Total	\$3,232,830.20

Note: While the state operates on a fiscal year basis (July 1 - June 30), the Title V fees are billed and spent on a calendar year basis. Consequently, some “Additional Support Services” costs, provided by other programs/organizations, in CY 2017 may include FY 2018 cost factors.

Note: 2017 Title V Account Annual/Monthly statement is presented in Table 11, Appendix B.

² Items covered under the “Contractual” category include: Legal Assistance, Fleet charges (vehicle rental), building rent, utilities, vendor payments, temp services, and the upkeep of some air monitoring equipment.

³ Items covered under “Additional Support Services” include: Information Technology (**\$28,105.28**), the Environmental Crimes Unit (**\$153,595.91 based on actual workload**), and OTS support (**\$27,408.16**).

⁴ Items covered under the “Small Business Ombudsman Program” include the salary and expenses of 1.0 FTE.

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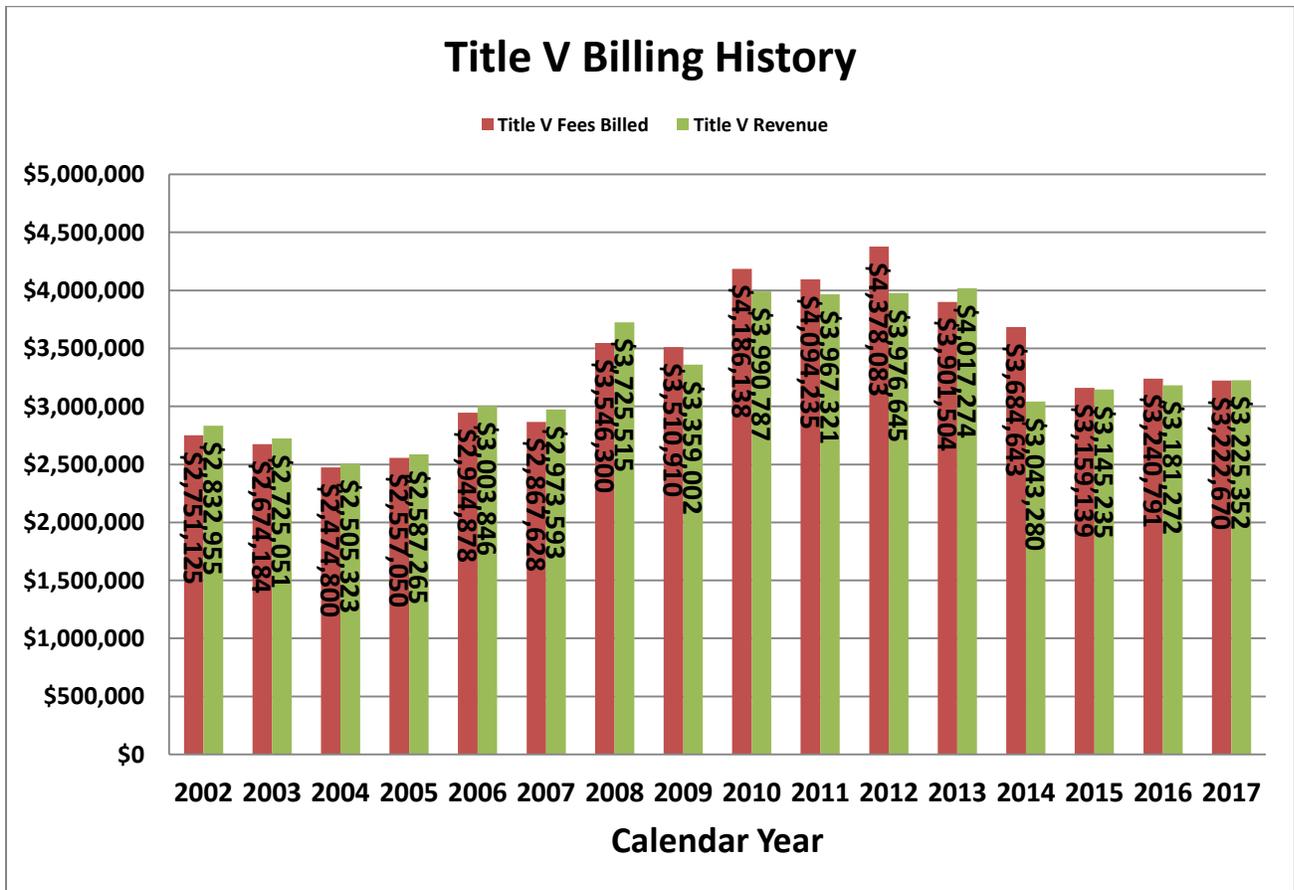
Fees Collected

Title V fees are billed on a calendar year basis (January 1 through December 31) and the 2017 Title V revenue is determined by the actual monies deposited into the Title V account during calendar year 2017 only. The final revenue is impacted by interest gained on the Title V account, quarterly payments, and some early payments that may be received and deposited in December 2017 for 2018 fees. This makes comparing revenue and fees collected difficult.

For CY2017, **77** Synthetic Minor and **50** Title V facilities were billed. Following the user fee credit program (approximately \$300,000, see Appendix A.), a total of **\$3,222,670**, including previous year(s)' back fees, was billed. Of the total amount billed, **\$3,204,270** was collected and **\$18,400** is overdue. The difference of **\$18,400** was the result of one facility's non-payment of 2016 and 2017 fees (see Table 5B). Any back fees that are collected in 2018 will be counted towards the 2018 revenue.

The Calendar Year 2017 Title V revenue was **\$3,225,352**. See Figure 1 for a history of Title V billing and revenue since 2002.

Figure 1: Title V Billing and Revenue History 2002-2017



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On December 31, 2017, the Title V carryover balance was **\$3,559,156** (see Table 2). Table 3 below captures the carryover balance history, while Table 4 predicts the carryover balance for end of year 2018.

Table 2: Title V Carryover Balance Calendar Year 2017

	2017
2016 Carryover Balance	\$3,612,029
2017 Title V Fee Revenue	\$3,225,352
2017 Encumbered Cash	\$454,605
Sub-Total	\$7,291,986
2017 Total Expenses	-\$3,232,830
OMB Budget Subsidy, Fund Transfer	-\$500,000
2017 Actual Carryover Balance	\$3,559,156

Table 3: Title V Carryover Balance History by Calendar Year

	2012	2013	2014	2015	2016	2017
Total Title V Fee Revenue	\$3,967,645	\$4,017,274	\$3,043,280	\$3,145,235	\$3,181,272	\$3,225,352
Total Expenses	\$3,403,998	\$3,248,203	\$3,088,668	\$2,979,694	\$3,141,964	\$3,232,830
Actual Carryover Balance	\$3,502,552	\$3,947,277	\$4,243,034	\$4,445,358	\$3,612,029	\$3,559,156

As previously noted, the Title V revenue is determined by the actual monies deposited into the Title V account during a calendar year. The final revenue is impacted by interest gained on the Title V account, quarterly payments, and some early payments that may be received and deposited in one year for the next year's fees.

Table 4: CY2018 Title V Carryover Balance Projection

	2018 Prediction
2017 Actual Carryover Balance	\$3,559,156
Estimated 2018 Title V Fee Revenue	\$2,884,453
Estimated 2018 Total Expenses	\$3,297,487
Salary Leveling Increase @ 90% Eng Staffing	\$208,600
Δ Revenue – Expenses	-\$621,634
2018 Projected Carryover Balance	\$2,937,522

The 2018 revenue prediction used in the above calculation was based upon the total amount of actual fees billed for 2018 to include overdue fees from previous year billings. The 2018 total expenses prediction was based upon the actual 2017 expenses plus a 2% cost of living adjustment. Please note, the average Division staffing level in CY 2017 was 87%.

Note: Effective December 24, 2017, a statewide salary leveling initiative was implemented for the Engineer job classification. This action raised and leveled the baseline salary, in each grade, for all DAQ assigned Engineers. As a result, we expect a Title V program salary and OEC increase of approximately \$208,000 per year.

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Delinquent Facilities

Consistent with legislative requirements and the Department collection policy, the Division of Air Quality first reported delinquent facilities in the 2014 Annual Report. Table 5A (below) provides a status update for the facilities reported last year for 2016.

Table 5A: 2016 Delinquent Fee Update

Facility Name	2016 Remaining Delinquent Balance	Recovery Actions Update
Micropore, Inc	\$0.00	2016 fees paid in full.
Coker Concrete	\$0.00	2016 fees paid in full.
Lars Recycling, LLC	\$8,750.00	No payment received in 2016. 2017 fees not paid. Overdue balance accumulating and late fee assessed.
2016 Remaining Balance	\$8,750.00	

Table 5B (below) reflects the 2017 delinquent facilities to include the amount owed and the specific actions taken to collect the overdue fees.

Table 5B: 2017 Delinquent Facilities

Facility Name	Amount Due	Recovery Actions
Lars Recycling, LLC	\$18,400.00	Includes 2016 overdue balance. No payments received in 2016 or 2017. Facility abandoned. Pursuing collection through Department level legal action.
TOTAL	\$18,400.00	

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New Fee Structure Calendar Years 2018 -2020

Note: The 2015-2017 fee structure, valid for the period of this report, is described in Appendix A. For the most recent five year history of facility hours and emissions data see Appendix D.

During October 2016 - June 2017, the Title V Committee reviewed and updated the fee structure. The category “K” Base Fee and User Fee category “10” normally assigned to new facilities, were deleted. Effective December 31, 2017, all new facilities will be evaluated and assessed a base fee based on estimated hours and a user fee based on the maximum allowable permitted emissions values. All other fee categories remained the same as the 2015 - 2017 fee tables.

For existing facilities, the 2018-2020 Base Fee is calculated on the total hours expended on each facility for the five year period from 2012-2016. The User Fee is calculated on the facility’s most recent baseline year emission inventory report (2014). See fee schedule in Table 6 below:

Table 6: Calendar Year 2018 through 2020 Title V Fee Schedule

Fee Type	Category	Category Description	2018 - 2020 Fees
Base Fee	A	> 6,000 Hours	\$277,020
Base Fee	B	5,001 – 6,000 Hours	\$108,300
Base Fee	C	4,001 – 5,000 Hours	\$93,480
Base Fee	D	3,001 – 4,000 Hours	\$80,940
Base Fee	E	2,001 – 3,000 Hours	\$57,000
Base Fee	F	1,501 – 2,000 Hours	\$42,180
Base Fee	G	1,001 – 1,500 Hours	\$28,500
Base Fee	H	667 – 1,000 Hours	\$18,240
Base Fee	I	334 – 666 Hours	\$9,120
Base Fee	J	0 – 333 Hours	\$5,700
User Fee	1	> 2,000 Tons	\$350,000
User Fee	2	1,001 – 2,000 Tons	\$100,000
User Fee	3	501 – 1,000 Tons	\$60,000
User Fee	4	201 – 500 Tons	\$28,000
User Fee	5	101 – 200 Tons	\$12,000
User Fee	6	51 – 100 Tons	\$9,000
User Fee	7	26 – 50 Tons	\$6,000
User Fee	8	6 – 25 Tons	\$4,100
User Fee	9	0 – 5 Tons	\$3,950

User Fee Credit Program

As part of the 2015-2017 legislation, a user fee credit program was established for calendar years 2015, 2016, 2017, 2018, 2019, and 2020.

Note: The 2015 - 2017 Fee Credit table, valid for the period of this report, is described in Appendix A.

In 2018-2020 the Department will grant annual user fee credits to sources with an active Title V or Synthetic Minor permit on or before December 31, 2017, and without delinquent accounts. User

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fee credits for 2018, 2019, and 2020 will be calculated as a percentage of the total Program annual fee reduction amount of \$385,000. As described in Table 7 below, eligible facilities will be granted the following fee credit percentages and amounts by User Fee category:

Table 7: User Fee Credits

User Fee Category	Fee Credit Percent	Fee Credit
1	Will receive a credit of 30.14% of \$385,000	\$116,039
2	Will receive a credit of 8.61% of \$385,000	\$33,149
3	Will receive a credit of 5.17% of \$385,000	\$19,905
4	Will receive a credit of 2.41% of \$385,000	\$9,279
5	Will receive a credit of 1.03% of \$385,000	\$3,966
6	Will receive a credit of 0.77% of \$385,000	\$2,965
7	Will receive a credit of 0.52% of \$385,000	\$2,002
8	Will receive a credit of 0.35% of \$385,000	\$1,348
9	Will receive a credit of 0.34% of \$385,000	\$1,309

The fee credit program will be terminated on December 31, 2020.

Current Staffing Levels

The Division of Air Quality’s end of calendar year 2017 staffing level was 82% and 11 positions were vacant. The Division’s authorized staffing level decreased from 65 to 61 in 2017. See Table 8 for a breakdown of the staffing levels for the Branches and Groups within the Division.

Table 8: Division of Air Quality Staffing Levels (12/31/2017)

Branch/Group	Authorized	Occupied	Staffing Level
Director	1.0	1.0	100%
Analytical Support Group	3.0	2.0	67%
Operations Support Group	2.5	2.5	100%
Administrative Group	4.0	2.0	50%
Engineering & Compliance Branch	23.5	18.5	91%
Planning Branch	27.0	24.0	89%
Total	61.0	50.0	82%
Conservation District Employees	1.0	1.0	100%
Temporary Positions	2.0	1.0	50%
Seasonal Positions	2.0	0.0	0%

During 2017, six full-time employees separated or retired from the Division and two additional full-time employees were hired. See Table 9 for a list of hiring actions taken in calendar year 2017.

Table 9: Calendar Year 2017 Hiring Actions

Date	Name	Source	Position	Branch	Funding
2/27/2017	Shane Cone	External	Scientist II	Planning	Title V/Air Grant
3/6/2017	Tracy Mattson	External	Administrative Spec. II	Admin Goup	Title V

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Please note that in 2008, the DAQ was authorized 76 full-time positions. As of December 31, 2017, state-wide personnel reductions have decreased the Division's authorized positions to 61 FTEs with a hiring cap of 57 employees.

The DAQ organizational chart, dated April 1, 2018, is depicted in Appendix C.

PROGRAM ACCOMPLISHMENTS

Title V Permitting Activities 2017

DAQ is responsible for all permitting activities at Title V and Synthetic Minor facilities. In calendar year 2017, the following permitting activities were accomplished:

- 5 Title V Permit Renewals were issued;
- 4 Title V Significant Permit Amendments were issued;
- No Public Hearings for Title V Permits were held;
- 2 Synthetic Minor Permits were issued;
- 18 Synthetic Minor Permit Amendments were issued

The Division of Air Quality is required to issue Title V Renewal Permits within 18 months or 547 days of determination of receipt of a complete application as defined by [7 DE Admin. Code 1130 \(http://regulations.delaware.gov/AdminCode/title7/1000/1100/1130.shtml#TopOfPage\)](http://regulations.delaware.gov/AdminCode/title7/1000/1100/1130.shtml#TopOfPage). In calendar year 2017, the Division of Air Quality issued Title V Permit Renewals in 864 days of complete application receipt on average. This figure is high this year due to the issuance of the renewal of a longstanding expired permit. Although the number is high, it is reflective of progress being achieved. Without inclusion of the long expired renewal, the remaining renewals were issued in an average of 396 days, which is less than the target.

As part of the Value Stream Mapping efforts for the Synthetic Minor permitting program, the Division of Air Quality has committed to issuing Synthetic Minor permits within 120 days of receiving a complete application. In calendar year 2017, Synthetic Minor permits were issued within 101 days from complete application receipt on average.

When a Title V source is constructing new equipment, the source may choose to have these permits issued using the "Federally Enforceable" process. This process requires that a draft permit be advertised for 30 days and that a proposed permit be sent to EPA for a 45 day review period. This process mirrors the path for issuing a Title V Permit, Permit Renewal, or Significant Permit Modification. If a construction permit or operating permit amendment follows these procedures, the permit can be incorporated into the Title V Permit using the Administrative Amendment process upon completion of construction of the new source. During calendar year 2017, there were six facilities and twelve permits utilizing this procedure.

Please note that while the Engineering & Compliance Branch has introduced efficiencies to improve permitting timeframes and reduce rework, as the Branch continues to operate with a reduced staffing level, instances where permit timeframes exceed the permit issuance range may occur.

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2017 Title V Compliance Activities

Many Title V related compliance activities are undertaken by the Division of Air Quality each year. These activities include on-site compliance evaluations or inspections, stack tests, and report reviews. In calendar year 2017, the following compliance activities were undertaken:

- 44 on-site compliance evaluations were conducted at Title V facilities;
- 178 stack tests were conducted at Title V facilities;
- 168 report reviews were conducted for Title V facilities;
- 29 on-site compliance evaluations were conducted at Synthetic Minor facilities;
- 16 stack tests were conducted at Synthetic Minor facilities; and
- 17 report reviews were conducted for Synthetic Minor facilities.

2017 Title V Enforcement Activities

If the compliance activities described above indicate that a facility is not in compliance with requirements, the Division of Air Quality will pursue enforcement action against that facility. Enforcement actions may take the form of Notices of Violation, Administrative Orders, Consent Decrees or Agreements, or Stipulated Penalties. In some cases, the Department takes no further action depending upon specific circumstances such as whether the violation was self-reported, minor, isolated and corrected quickly. In other cases, the Department has the authority and may seek, and generally obtains, fines and penalties. For a complete description of enforcement activities, see the Department of Natural Resources and Environmental Control's "Compliance and Enforcement Response Guide" available at:

<http://www.dnrec.delaware.gov/Admin/Documents/DNREC-Compliance-Enforcement-Response-Guide.pdf>. In calendar year 2017, the following enforcement activities were completed (please note that this does not include pending enforcement activities):

- 7 Notices of Violation were issued to Title V facilities;
- No Administrative Orders were issued to Title V facilities;
- No Stipulated Penalty Demand Letters were issued;
- No Consent Decrees were issued;
- 3 Notices of Violation were issued to Synthetic Minor facilities; and
- 1 Administrative Order was issued to a Synthetic Minor facility.

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Title V Planning Activities

There are many planning activities associated with the Title V program. These activities include, but are not limited to:

- Preparing State Implementation Plan (SIP) revisions to ensure and demonstrate progress in attaining and maintaining ambient air quality standards, and meeting visibility goals; and
- Developing and maintaining comprehensive criteria pollutant and air toxics emission inventories; and
- Developing and maintaining air pollution control regulations in accordance with State and Federal requirements.

The Planning Branch of the Division of Air Quality accomplished the following Title V related planning activities in calendar year 2017:

- State Implementation Plan (SIP) activities:
 - Challenged in Court, the EPA failure to act on the four CAA Section 126 petitions that DE submitted targeting power plants in Pennsylvania and West Virginia that significantly contribute to ozone nonattainment in Delaware because they are not appropriately controlled/regulated.
 - Continued challenge in the D.C. Circuit Court, EPA's attainment date extension for the 2008 Ozone NAAQS.
 - Continued challenged in the D.C. Circuit Court, EPA's Cross State Air Pollution Rule (CSAPR) update.
 - Continued to support Delaware Attorney General in a petition for review of the EPA's Startup, Shutdown and Malfunction SIP Call.
- Regulatory Development Activities:
 - Worked on the repeal of 7 DE Admin. Code 1123, Standards of Performance for Steel Plants: Electric Arc Furnaces (effective in 2018)
 - Worked on updating 7 DE Admin. Code 1136, Acid Rain Program to include current portions of 40 CFR Parts 72 -78 that EPA has revised since we initially adopted these regulations (effective in 2018)
 - Finalized a 111(d) State Plan and regulation amendment (Section 30 of 7 DE Admin. Code 1120) to fulfill the requirements of 40 CFR Part 60 Subpart XXX and 40 CFR Part 60, Subpart Cf, which regulated emissions from municipal solid waste landfills.
 - Worked on updating 7 DE Admin. Code 1140, Acid Rain Program to update the adoption by reference of California's Low Emission Vehicle (LEV) III Standard and the Greenhouse Gas Standard (effective in 2018)
- Other Title V Activities:
 - Began work on Delaware's third year PM Advance Plan and progress report.
 - Completed substantive work on Delaware's second Regional Haze SIP.
 - Continued a Community-based Special Study with the Moveable Air Monitoring Platform (MMP) study at Eden Park.
 - Completed substantive work on a review and analysis of the EPA 2014 National Air Toxics Assessment (NATA).

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- Continued work with the Delaware Attorney General on actions to prevent EPA follow-up actions from negating the impact of the U.S. Court of Appeals for the District of Columbia's ruling on EPA's 100 hour exemption from air pollution control requirements, for RICE engines that participate in demand response programs.
- Continued to work with the EPA and other states and organizations to address and mitigate the impact of upwind emissions on Delaware's ozone air quality problems.
- Submitted to the EPA, in accordance with 40 CFR §58.10(a), an annual air monitoring network plan.
- Submitted comments and presented testimony at an EPA hearing in opposition to EPA's denial of the 176A petition to expand the OTR to include the States that are the cause of Delaware's ozone nonattainment.

Title V Emission Inventory Activities

The Emission Inventory Group is part of the Planning Branch of the Division of Air Quality. The Emission Inventory Group is charged with preparing all necessary inventories of emissions from all sources of air pollution in the State, including stationary sources, area sources, and mobile sources. The information gathered by the Emission Inventory Group is used in many of the planning activities described above. Emissions include criteria air pollutants, air toxics, and greenhouse gases.

The Emission Inventory Group accomplished the following Title V related activities in calendar year 2017:

- Contacted all Title V permitted facilities required to report 2016 emissions of criteria pollutants and facilitated updates to their on-line emissions reporting structure;
- Collected 2016 point source data from 56 facilities through the annual reporting cycle that takes place in the March through April 2017 timeframe;
- Performed a technical review of the submitted data for completeness and accuracy; and
- Submitted 2016 point source data to EPA's Emissions Inventory System.

Title V Air Monitoring Activities

The Air Monitoring Group of the Division of Air Quality conducts several Title V related activities including:

- Measuring ambient concentrations of selected air pollutants and selected meteorological parameters; and
- Conducting source emission evaluations by observing emission test and spot checks with the portable combustion analyzer.

The ambient air monitoring program receives funding from several sources to accomplish its monitoring objectives. The Title V program supports approximately 45% of the personnel costs in the program. In Calendar Year 2017, the Air Monitoring Group accomplished the following Title V related activities:

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- Measured the ambient (outdoor) concentrations of the criteria air pollutants along with selected weather parameters. The monitoring network consists of eleven fixed-site monitoring locations, including three PM_{2.5} standalone sites;
- Conducted special studies to address citizen concerns, to evaluate the need to relocate or add additional fixed sites, or to measure the impact of a particular air pollution source;
 - In 2017, the DAQ continued a special monitoring program near the Port of Wilmington using the MMP (Moveable Monitoring Platform). This study focuses on the neighborhood of Eden Park and their concerns regarding particulate emissions issues from local industry and heavy duty diesel emissions, both mobile and stationary sources, associated with these industrial activities.
- Developed the capacity to conduct small scale community saturation studies for particulate concerns.
- Participated in several community health based outreach events to discuss environmental concerns with citizens of New Castle County and other interested individuals.
- Routinely monitored selected hazardous air pollutants (air toxics) including metals and volatile organic compounds.

Title V Small Business Ombudsman Activities

The Small Business Assistance Program (SBAP) was created through the Clean Air Act Amendments of 1990. The SBAP within the Department is a free service available to all new and existing small businesses located in the State of Delaware. The SBAP can help small businesses understand their environmental requirements and help them comply in the easiest and most effective way. The SBAP is a non-regulatory program. The Department's SBAP is comprised and managed by one staff member, the Small Business Ombudsman (SBO).

The SBAP provides the following services:

- Serves as small businesses initial contact within DNREC;
- Provides specific information for small businesses detailing how to comply with environmental regulations specific to their industry;
- Helps small businesses fill out permit applications, forms and other required paperwork;
- Conducts environmental assessments at small businesses and discusses compliance;
- Keeps abreast of developing regulations and current issues impacting small businesses and shares that information with small businesses through workshops, newsletters, trade association meetings, mailings, websites, and other methods;
- Provides feedback to the Division of Air Quality from small businesses;
- Helps resolve permitting and compliance disputes and cuts red tape;
- Seeks funding opportunities for special programs that benefit small businesses; and
- Serves as the manager of the Regulatory Advisory Service (RAS).

The SBO also serves on the following committees:

- Title V Fee Committee (as needed)

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- Delaware Envirothon planning committee
- Division of Air Quality's Envirothon Project Team
- Office of the Secretary Recognition Committee
- Coordinates the committee that reviews incinerator ban applicability applications

The SBO also serves as the Department's Registrar of Regulations and is responsible for coordinating with the state Office of the Registrar of Regulations.

In Calendar Year 2017 the SBO conducted the following activities:

- Conducted three Regulatory Advisory Service (RAS) meetings.
- Participated in a variety of outreach events:
 - Delaware Department of Transportation's Civil Rights Summit (Jan. 19)
 - Provided a display and information on the Small Business Assistance Program and DNREC in general
 - Make-a-Splash Water Festival sponsored by DNREC's St. Jones Reserve (Apr. 5)
 - Delaware Envirothon - sponsored by the Del. Assoc. of Conservation Districts (Apr. 27)
 - Serve as co-chair of the Division of Air Quality's Envirothon project team and as such have shared responsibility for coordinating planning meetings; preparing meeting notes and updating the online project folder; coordinating the team's efforts in updating the annual training guide; developing and implementing a 90 minute training session; coordinating the development/updating of competition test questions; and coordinating staff involvement for the competition. 2017 theme was Air Pollution Basics.
 - Training session was held on Saturday, January 21, 2017 and was attended by 25 students and 6 teachers representing 8 high schools in New Castle and Kent counties.
 - Worked with Envirothon project team to implement a first ever extra credit, hands-on air quality project. Ten teams assembled and submitted their particle sensor projects after testing for particles in a variety of settings and reporting their findings in a short written report and a video.
 - Delaware State Fair (Jul. 23, 26 and 29)
 - Worked three shifts in the DNREC building which is sponsored by all of DNREC's divisions.
 - Kent County Economic Summit held at DelTech's Terry Campus and attended by nearly 300 participants. (Sep. 19)
 - Provided a display and information on the Small Business Assistance Program and DNREC in general
- Continued participating in the statewide *County is Open for Business* events held monthly in each county. Attended 14 events and made 70 contacts with business entrepreneurs interested in learning about DNREC and potential permit/regulation requirements.
- As the Department's Registrar, worked with Department staff to ensure the Regulatory Development Process steps were being followed. A total of 18 Start Action Notices

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initiating the process were approved. A total of 36 items were submitted to the State Registrar's office for publication: 17 proposals, 9 finals, 2 emergency regulations, 3 general notices, 2 errata, and three State Implementation Plans.

- Conducted three training sessions (Jan. 18, Mar. 15 and 22) on DNREC's Regulatory Development Process that was updated in late December 2016 and finalized at the beginning of 2017. Training was attended by a total of 68 staff members. The sessions were held in conjunction with the (State) Office of the Registrar of Regulations and covered the regulatory process, applicable legislation and administrative procedures, the Regulatory Flexibility Analysis and Regulatory Impact Statement (RFA/RIS) forms, and the Drafting and Style Manual.
- Developed a spreadsheet for and continue to track division activity on the 18 regulations identified for amendment or repeal in the Department's 2016 Regulatory Review. Facilitated the name correction in the Administrative Code for one Division of Air Quality regulation and facilitated the inclusion of one Waste & Hazardous Substance regulation that was inadvertently left out of the Administrative Code when it was originally promulgated back in 1991.
- Participated in three EPA Region III 507 Program Regional Liaison conference calls. The purpose of the calls is to provide activity updates by each state.
- Participated in two DNREC Division of Waste & Hazardous Substances senior staff meetings to provide an update on SBAP activities.
- Communicated with representatives of local chambers of commerce, trade associations and the now defunct Delaware Economic Development office.
- Worked with DAQ's Area Sources Program staff on outreach to dry cleaners. DAQ overhauled the Perchloroethylene Dry Cleaner Source Category permits and requested the assistance of the SBO to develop a fact sheet to be delivered with the new permits. The fact sheet was developed and explains why the new permits were developed, contains a list of important things to remember, and lists the top non-compliance issues.
 - Helped coordinate getting a Division of Waste & Hazardous Substances hazardous waste management fact sheet specifically for dry cleaners to also be distributed with the new dry cleaner permits.
 - Prepared and submitted to EPA a brief write-up about the overhauled permits and new fact sheets. The write up was included in the October 2017 edition of Small-Biz@EPA, an EPA monthly newsletter for the small business community.
- Represented and continues to represent DNREC on the Adult Use Cannabis Task Force. Attended monthly task force meetings. With the assistance of DNREC staff, prepared and provided a fact sheet on DNREC requirements for and concerns with Cannabis grow, processing and dispensing operations and gave testimony on the same.
- Provided permit and compliance assistance to 58 entities through phone calls and e-mails.
 - 68 phone calls made and received 323 emails sent and received.

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Other Special Accomplishments and Projects

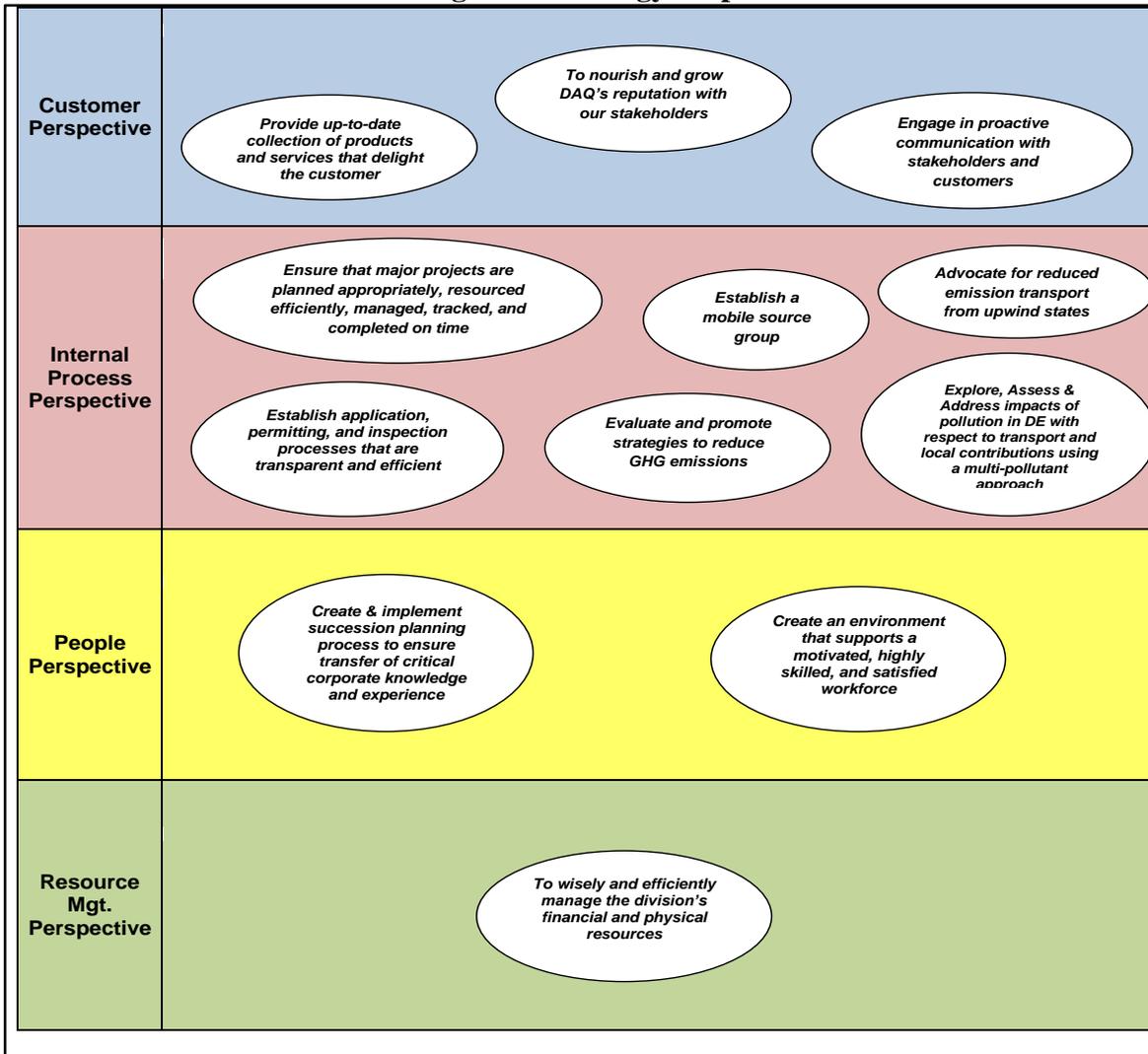
Created in 2012 and captured in previous reports, the DAQ continues to refine a comprehensive Strategic Plan that involves reviewing how the Division currently operates and establishes goals for the future. This Strategic Plan is based upon the DAQ's vision and mission. The Strategic Plan leverages a "Balanced Scorecard" approach to review the DAQ's goals from four separate perspectives:

- Customer;
- Resource Management;
- Internal Processes; and
- People.

The Balanced Scorecard approach resulted in a strategy map outlining the DAQ's goals. This strategy map is shown in Figure 2.

To reach the goals outlined on the strategy map, the DAQ developed Air Action Plans for the individual activities required to achieve these goals. Each Air Action Plan includes a goal statement, objectives, a schedule of activities that must be conducted to complete the Air Action Plan and performance measures to ensure that the Air Action Plans are being completed. A comprehensive list of Air Action Plans was identified in the 2013 Annual TV Committee Report.

Figure 2: Strategy Map



The DAQ continues to execute its strategy with focus upon the division key priorities. These are listed and detailed in Table 10 below. In addition to the work that is ongoing with several of the action plans in support of these priorities, the Division is working to ensure that all its processes are efficient, meet customer needs, and follow a continuous improvement methodology. We've defined the LEAN Six Sigma tool as our approach.

As a first step, the Division inventoried all its processes. The list was long, with 245 processes identified. This list was prioritized based upon 5 criteria that include:

1. Irritation Level
2. Level of Complexity
3. Resource Requirement
4. Interdependence
5. Mandatory

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The Top 5 processes from each program were identified, resulting in 45 processes.

Secondly, the Division trained and certified ten staff as Six-Sigma Green Belts. The Green Belts will help to facilitate LEAN Six-Sigma process improvement efforts. Complementing the LEAN Six-Sigma Training, three staff members were trained and certified as Baldrige examiners. These members participated in a regional Baldrige Quality Award process, gaining extensive knowledge and valuable experience in a systems approach to improving an organization.

Table 10: DAQ Priorities

Priority Name	Description
Air Pollution Transport	Cross state air pollution is managed so that we are able to meet and maintain healthy air quality for Delaware citizens.
Climate Change	We will continue to increase public awareness of Delaware’s vulnerabilities and implement proactive projects to address mitigation, resiliency and adaptation through coordinated efforts with stakeholders and other agencies.
Communities	We ensure that no communities in Delaware are subjected to disparate environmental impacts.
Improving Manufacturing Efficiencies	Existing facilities are able to operate in a manner that will reduce costs, improve air quality, and improve the overall efficiency without unnecessary regulatory burden.
Mobile Sources	Ensure that multi-modal transportation options are widely available to all Delawareans so that Vehicle Miles Travelled are reduced year after year with declining reliance on cars. The emissions from the transportation sector decline with the use of cleaner fuels and improved technologies.
Workforce Development	Our work environment supports a motivated, highly skilled, and satisfied workforce.

As the Division strives to improve our internal processes, we continue to identify and work to retain critical organizational knowledge and skillsets, subject to loss through normal staff attrition. Our deployment of the succession planning tool within DAQ is based upon the finding that 50% of the Division staff was eligible for full or reduced retirement benefits within a 5-year period. Of this crucial group, 25% of those staff members were eligible for immediate retirement and benefits. Recognizing the potential loss of decades of knowledge, experience and skills, the Division implemented a systematic Succession Planning initiative to identify and transfer critical knowledge and skillsets from experienced staff to more junior and suitable candidates. Figure: 3 describes the key elements of the succession plan.

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Evolving from the succession planning initiative, DAQ created and implemented an Annual Training Plan for all staff members. This mandatory training plan will identify and target critical training priorities identified in the overall succession plan while continuing to focus on individual career development for all staff.

Figure 3: DAQ Succession Planning Initiative



While the Air Quality Team maps out the future through strategic planning, process improvement and the development of our staff, the Division also participates in many special projects. These special projects may or may not be Title V related. However, the results of these projects often impact Title V activities. In calendar year 2017, the Division of Air Quality participated in the following special activities:

- Management and administrative activities including:
 - Updated the Division's Continuity of Operations Plan (COOP) and transitioned to a new emergency management software and communications system. This upgrade required a complete revision of all critical emergency plans and operations.
 - Division Safety Council, comprised of a team of DAQ staff volunteers, planned, organized and executed a Program Level Safety Initiative. This continuing effort provides an avenue for the staff to identify their highest safety concerns. The front-line staff communicated 21 critical concerns that the council quickly triaged, investigated and prioritized. The risk assessment and mitigation, for each concern, continues in 2018 and will create a permanent path for staff to raise safety concerns that will be immediately addressed.
- Participated in outreach activities including:
 - For a sixth year, the DAQ worked with the Delaware Envirothon Committee supporting high school level environmental education. Since 2012, Air Quality has been included as a key topic/study area for the Delaware Envirothon

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- competitions. The Division of Air Quality is a Gold Sponsor for the Envirothon program supporting the Delaware and International Envirothon competitions;
- Educational programs and public outreach events addressing energy conservation;
- Educational programs or public outreach events addressing school-related anti-idling requirements;
- Educational information and public outreach on open-burning restrictions;
- Air quality awareness outreach; and
- Asthma awareness outreach.
- Participated in Cancer Consortia activities;
- Continued to provide compliance assistance and oversight to auto body shops, dry cleaners, and gasoline delivery vessels for state and federal air regulations;
- Continued to track and provide oversight on vapor recovery tests of regulated gasoline dispensing facilities;
- Mobile Source Activities including:
 - Monthly participation with Metropolitan Planning Organizations (WILMAPCO and Dover/Kent MPO) Technical Advisory Committee;
 - Meeting with the Transportation Conformity Inter-Agency Consultation Workgroup to discuss SIP planning for PM_{2.5} and Ozone Attainment;
 - Participated in Vehicle Inspection and Maintenance Activities;
 - Development of mobile budgets for PM_{2.5};
 - Conducted a Phase II Remote Sensing Study;
 - Participated on the Clean Air Council Delaware Diesel Difference;
 - Continued implementation and evaluation of a new vehicle remote sensing program to provide data to 1) evaluate the effectiveness of our vehicle inspection and maintenance program, and 2) develop strategies to further reduce mobile source related emissions; and
 - Continued to identify and quantify emissions associated with new residential development in Delaware through the PLUS Process.
- Provided support to the Coastal Zone program for conducting technical reviews of Coastal Zone applications;
- Coordinated with the Energy and Climate Division on energy policy issues; and
- Continued working with the Delaware Air Quality Partnership mascot “TROPO”. Tropo is a life-size mascot that supports outreach programs for youth and their families. Supported by DAQ, Tropo visited several Delaware schools, community centers and the state fair to educate kids and encourage them to improve air quality.

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Appendix A: 2015-2017 Fee Structure

During January-June 2014, the Title V Committee reviewed and updated the 2015-2017 fee structure. The supporting legislation (HB 374) was passed by the House on June 17, 2014, was passed by the Senate on June 26, 2014, and was signed by the Governor on September 11, 2014.

The Base Fee was calculated on the total hours expended on each facility for the five year period from 2009-2013. The User Fee was calculated on the facility’s 2011 baseline year emission inventory report. The Title V Fee Schedule for Calendar Years 2015 through 2017 is provided below:

Calendar Year 2015 through 2017 Title V Fee Schedule

Fee Type	Category	Category Description	2015 - 2017 Fees
Base Fee	A	> 6,000 Hours	\$277,020
Base Fee	B	5,001 – 6,000 Hours	\$108,300
Base Fee	C	4,001 – 5,000 Hours	\$93,480
Base Fee	D	3,001 – 4,000 Hours	\$80,940
Base Fee	E	2,001 – 3,000 Hours	\$57,000
Base Fee	F	1,501 – 2,000 Hours	\$42,180
Base Fee	G	1,001 – 1,500 Hours	\$28,500
Base Fee	H	667 – 1,000 Hours	\$18,240
Base Fee	I	334 – 666 Hours	\$9,120
Base Fee	J	0 – 333 Hours	\$5,700
Base Fee	K	New Sources that have applied for a permit after January 1, 2014	\$6,840
User Fee	1	> 2,000 Tons	\$350,000
User Fee	2	1,001 – 2,000 Tons	\$100,000
User Fee	3	501 – 1,000 Tons	\$60,000
User Fee	4	201 – 500 Tons	\$28,000
User Fee	5	101 – 200 Tons	\$12,000
User Fee	6	51 – 100 Tons	\$9,000
User Fee	7	26 – 50 Tons	\$6,000
User Fee	8	6 – 25 Tons	\$4,100
User Fee	9	0 – 5 Tons	\$3,950
User Fee	10	New Sources that have applied for a permit after January 1, 2014	\$6,000

2015-2017 User Fee Credit Program

As part of the 2015-2017 legislation, a user fee credit program was established for calendar years 2015, 2016, 2017, 2018, 2019, and 2020. The Department granted annual user fee credits to sources with an active Title V or Synthetic Minor permit on or before December 31, 2014, and without delinquent accounts. The credit was determined by the categorical status of a qualifying facility in calendar year 2014. User fee credits for 2015, 2016, and 2017 were calculated as a percentage of the total Program annual fee reduction amount of \$300,000. As described in the

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table below, eligible facilities were granted the following fee credit percentages by User Fee category in 2017:

2015 – 2017 User Fee Credits

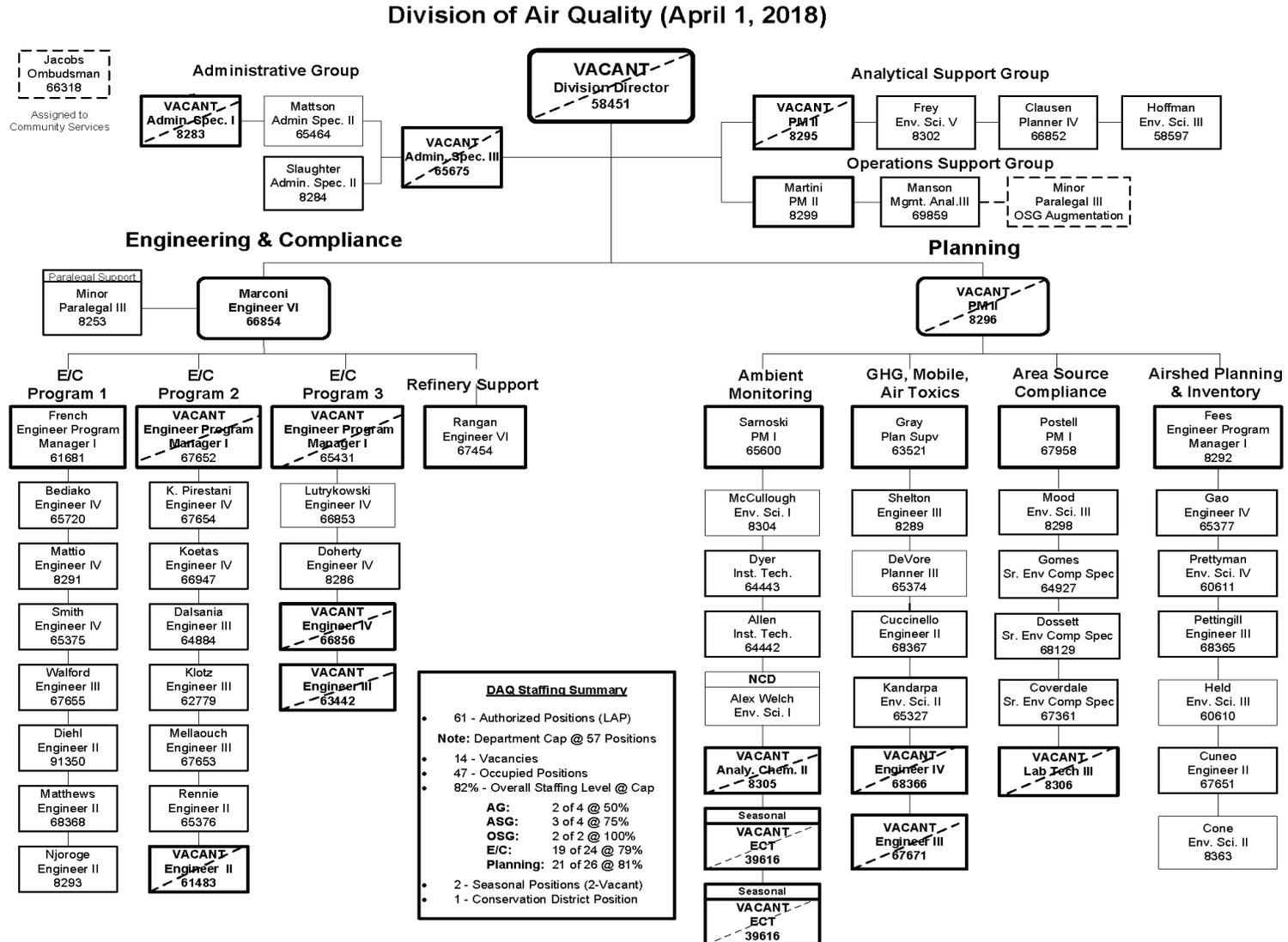
User Fee Category	Fee Credit Percent	Fee Credit
1	Will receive a credit of 26.25% of \$300,000	\$78,750
2	Will receive a credit of 7.50% of \$300,000	\$22,500
3	Will receive a credit of 4.50% of \$300,000	\$13,500
4	Will receive a credit of 2.10% of \$300,000	\$6,300
5	Will receive a credit of 0.90% of \$300,000	\$2,700
6	Will receive a credit of 0.68% of \$300,000	\$2,040
7	Will receive a credit of 0.45% of \$300,000	\$1,350
8	Will receive a credit of 0.30% of \$300,000	\$900
9	Will receive a credit of 0.30% of \$300,000	\$900
10	Will receive a credit of 0%.	\$0

Appendix B: 2017 Title V Monthly Expense and Revenue

Table 11: 2017 Title V Account Expenses and Revenue								
MONTH	EXPENSES						INTEREST	REVENUE
	Salary	Energy	Travel	Contractual	Supplies	Capital Outlay		
January	\$167,651.83	\$0.00	\$1,944.81	\$41,546.64	\$31,545.71	\$0.00	\$3,513.82	\$82,858.82
February	\$190,051.76	\$0.00	\$1,232.20	\$42,803.58	\$1,001.67	\$0.00	\$3,647.51	\$2,395,932.51
March	\$241,462.30	\$0.00	\$842.37	\$163,065.51	\$15,021.66	\$0.00	\$4,236.77	\$260,399.27
April	\$203,144.66	\$0.00	\$2,050.77	\$45,837.49	\$13,044.38	\$0.00	\$5,293.70	\$105,866.20
May	\$176,579.53	\$0.00	\$3,853.99	\$156,355.25	\$7,046.64	\$0.00	\$5,160.23	\$161,610.23
June	\$208,367.32	\$0.00	\$335.93	\$123,524.52	\$8,189.27	\$0.00	\$5,160.93	\$34,978.93
July	\$202,919.12	\$0.00	\$963.94	\$4,679.86	\$3,044.93	\$0.00	\$4,372.62	\$56,002.62
August	\$168,002.06	\$0.00	\$473.80	\$41,858.60	\$2,322.94	\$0.00	\$2,230.72	\$40,138.22
September	\$260,678.35	\$0.00	\$1,478.81	\$13,008.25	\$326.65	\$0.00	\$2,056.09	\$17,216.09
October	\$164,527.07	\$0.00	\$2,551.58	\$19,681.40	\$15,983.60	\$0.00	\$1,927.28	\$4,152.28
November	\$166,313.78	\$0.00	-\$458.12	\$68,176.37	\$0.00	\$0.00	\$1,888.94	\$20,889.44
December	\$193,009.60	\$0.00	\$8.75	\$53,606.89	\$3,172.18	\$0.00	\$1,732.80	\$45,307.80
2017 Totals	\$2,342,707.38	\$0.00	\$15,278.83	\$774,144.36	\$100,699.63	\$0.00	*\$41,221.41	\$3,225,352.41
2017 Total Expenses	\$3,232,830.20							

*Total interest included in revenue totals.

Appendix C: DAQ Organizational Chart (April 1, 2018):



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Appendix D: Facility Hours and Emissions History: Depicts the most recent 6-year history of hours expended on each facility and the 2014 baseline emissions inventory.

Facility ID #	Company Name	Class	2017 Hours	2016 Hours	2015 Hours	2014 Hours	2013 Hours	2012 Hours	Current Fee Total 2012-2016	2014 NO _x (TPY)	2014 PM ₁₀ (TPY)	2014 SO ₂ (TPY)	2014 VOC (TPY)	2014 Total Emissions
1000300049	1007 Market St. Condominium Association	TV	33.50	124.00	85.25	78.5	161.5	146	595.25	5.73	0.03	0.03	0.32	6.11
1000300073	Aearo Technologies LLC	TV	52.00	101.25	26.25	57.00	111.00	185.00	480.50	0.52	0.00	0.00	3.44	3.97
1000300131	Alfred I DuPont Hospital For Children	TV	36.50	81.00	77.50	218.00	200.50	336.30	913.30	12.86	0.23	0.21	0.68	13.98
1000300933	Allan Myers DE, Inc. Wilmington	SM	431.50	193.50	134.00	5.00	0.00	268.25	600.75	2.11	1.94	0.27	0.64	4.95
1000100006	Allan Myers, Delaware, Inc - Dover	SM	72.00	16.50	56.25	150.25	104.75	320.50	648.25	1.73	2.19	0.16	1.57	5.64
1000500130	Allan Myers, Delaware, Inc - Georgetown	SM	65.50	32.50	39.00	130.25	39.00	50.50	291.25	3.34	2.74	3.53	1.94	11.55
1000500013	Allens Harim Foods LLC	SM	9.50	52.00	48.00	0.00	20.00	42.50	162.50	0.92	0.01	0.01	0.05	0.98
1000300924	Amazon.Com	SM	0.00	62.00					62.00		8.00			8.00
1000100247	Ameresco Delaware Energy - Sandtown	TV	292.50	222.00	219.00	207.00	96.25	92.50	836.75	32.66	8.37	7.18	13.98	62.19
1000500258	Ameresco Delaware Energy - Southern	TV	331.25	304.25	292.75	328.50	286.50	123.00	1335.00	35.39	9.10	30.43	14.70	89.62
1000300785	American Air Liquide-Glasgow	SM	44.50	15.50	2.00	13.50	32.50	128.75	192.25	7.50	0.06	0.06	0.92	8.53
1000300023	Amtrak Wilmington Maintenance Facility	TV	66.00	41.00	155.50	94.75	245.00	158.25	694.50	4.37	0.16	0.03	1.37	5.92
1000300059	Arlon, Inc	SM	88.00	3.50	41.00	192.50	114.50	16.50	368.00	1.53	2.88	0.01	6.37	10.79
1000300106	AstraZeneca Pharmaceuticals LLC,-Fairfax	SM	8.50	96.50	78.50	397.50	226.00	218.25	1016.75	3.25	0.04	0.04	0.17	3.50
1000300107	AstraZeneca Pharmaceuticals, LLC-Newark	SM	141.00	0.00	49.00	195.00	44.50	81.00	369.50	5.55	0.08	0.08	0.34	6.05
1000300003	BASF Color & Effects USA LLC - Newport	TV	220.00	250.50	131.50	390.50	86.50	839.00	1698.00	10.31	1.32	0.17	20.53	32.33
1000100026	Bayhealth Medical Center-Kent General Hospital	SM	68.00	33.50	41.00	64.00	57.50	107.75	303.75	3.39	0.09	0.09	1.32	4.89
1000500036	Bayhealth Medical Center-Milford Memorial Hospital	SM	50.50	7.00	35.50	28.50	71.00	44.50	186.50	3.03	0.10	0.48	1.14	4.75
1000300782	Bilcare Research Inc	SM	0.00	44.50	41.50	7.50	0.00	88.50	182.00	0.30	4.87	0.00	6.40	11.57
1000300600	BOA - Bracebridge (Subsidiary Bank Of America)	SM	4.00	32.00	0.00	0.50	27.75	45.25	105.50	4.30	0.07	0.06	0.20	4.63
1000300599	BOA - Christiana (Subsidiary Bank Of America)	SM	5.00	35.25	0.00	10.50	0.00	13.50	59.25	0.66	0.05	0.04	0.04	0.79
1000300277	BOA - Deerfield	SM	26.00	65.00	0.00	0.00	0.00	6.50	71.50	2.36	0.17	0.14	0.13	2.79
1000300317	Calpine Mid-Atlantic Generation-Christiana Energy Ctr.	TV	162.00	56.25	30.75	98.75	15.50	135.50	336.75	7.94	0.99	1.78	0.01	10.71
1000300005	Calpine Mid-Atlantic Generation-Delaware City Energy Ctr.	TV	141.00	50.25	25.25	82.75	15.00	64.75	238.00	3.19	0.40	0.78	0.00	4.38
1000300007	Calpine Mid-Atlantic Generation-Edge Moor	TV	310.50	453.00	356.50	370.00	498.50	676.75	2354.75	334.46	10.92	122.43	26.79	494.60
1000300388	Calpine Mid-Atlantic Generation-Hay Road	TV	176.50	511.00	594.25	547.75	437.75	341.00	2431.75	886.40	10.36	30.00	38.03	964.80
1000300006	Calpine Mid-Atlantic Generation-West Energy Center	TV	141.00	52.75	29.75	54.75	16.75	104.00	258.00	0.66	0.12	0.22	0.00	1.00
1000300080	Christiana Care Health Services - Christiana Hospital	TV	492.25	199.50	121.75	189.50	405.50	189.50	1105.75	13.82	0.08	0.08	2.02	16.01
1000300024	Christiana Care Health Services - Wilmington Hospital	SM	71.50	128.75	3.00	15.75	90.00	22.50	260.00	7.09	0.12	0.11	0.74	8.06
1000300068	Christiana Materials, LLC	SM	40.00	117.25	10.00	107.00	40.00	167.00	441.25	1.68	2.50	0.27	0.84	5.29
1000100002	City Of Dover - McKee Run Generating Sta	TV	254.25	181.75	90.50	307.50	158.50	100.25	838.50	42.12	0.45	0.65	1.54	44.75
1000100076	City Of Dover-Van Sant Generating Sta	TV	105.75	87.50	153.25	124.75	95.50	68.50	529.50	7.81	0.41	0.10	0.06	8.39
1000300290	Clean Earth Of New Castle Inc	TV	84.75	64.00	394.25	281.75	128.75	227.75	1096.50	6.39	0.98	5.40	1.49	14.26
1000100219	Coastal Coatings Inc - Dover	SM	7.50	3.00	3.25	2.50	10.00	0.00	18.75				4.36	4.36
1077700162	Coker Concrete Roving Crusher	SM	4.00	163.50	6.00	58.25	122.75	0.00	350.50	0.06	0.01	0.01	0.01	0.09
1000300506	Computer Sciences Corporation	SM	0.00	0.00	16.00	1.50	35.50	0.00	53.00	1.46	0.10	0.10	0.08	1.73
1000300593	Conectiv Thermal Systems	SM	32.50	0.00	68.00	5.50	6.00	36.00	115.50	0.50	0.02	0.01	0.06	0.59
1000300066	Contractors Materials LLC - Heald Street	SM	11.50	29.25	66.00	0.00	0.00	55.50	150.75	1.88	2.60	0.23	2.33	7.03

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Appendix D: Facility Hours and Emissions History: Depicts the most recent 6-year history of hours expended on each facility and the 2014 baseline emissions inventory.

Facility ID #	Company Name	Class	2017 Hours	2016 Hours	2015 Hours	2014 Hours	2013 Hours	2012 Hours	Current Fee Total 2012-2016	2014 NO _x (TPY)	2014 PM ₁₀ (TPY)	2014 SO ₂ (TPY)	2014 VOC (TPY)	2014 Total Emissions
1077700800	Corrado Construction Co LLC	SM	0.00	5.50	0.00	2.00	39.50	29.00	76.00	0.59	0.04	0.04	0.03	0.71
1000300058	Croda, Inc	TV	628.50	602.50	463.25	485.75	457.00	354.75	2363.25	13.06	4.82	1.03	6.25	25.15
1000300351	Dana Railcare	SM	0.00	0.00	1.25	4.00	56.00	58.50	119.75	0.15	0.05	0.02	0.88	1.11
1000300365	Dassault Falcon Jet-Wilmington Corp	TV	97.75	296.50	169.00	118.75	351.25	91.00	1026.50	1.22	0.01	0.01	13.28	14.52
1000300016	Delaware City Refining Co-Delaware City	TV	3751.00	2864.75	2566.00	3032.00	3108.00	3517.25	15088.00	1967.66	255.59	430.98	192.80	2847.03
1000300404	Delaware City Refining Co-Marketing Terminal	TV	60.50	125.25	97.75	0.00	126.00	0.00	349.00	0.07	0.01	0.00	21.90	21.97
1000100005	Delaware Hospital For The Chronically II	SM	1.50	13.50	46.50	32.25	102.75	144.75	339.75	2.58	0.04	0.04	0.14	2.80
1000300827	Delaware Park Horse Racing Track	SM	47.75	0.00	30.00	0.00	0.00	7.00	37.00	0.14	0.01	0.04	0.03	0.22
1000300415	Delaware Recyclable Products, Inc	SM	21.00	86.25	23.00	0.75	78.50	33.75	222.25	5.49	10.06	44.66	4.34	64.55
1000300111	Delaware Solid Waste Authority, Cherry Island	TV	278.50	467.25	416.75	449.50	141.25	392.75	1867.50	7.35	3.85	20.26	2.84	34.30
1000100068	Delaware Solid Waste Authority, Sandtown	TV	48.50	25.00	141.00	187.75	143.50	118.75	616.00	3.22	1.21	3.42	2.62	10.47
1000500099	Delaware Solid Waste Authority, Southern	TV	164.00	158.25	202.25	440.00	138.00	228.00	1166.50	1.67	0.20	2.10	1.58	5.54
1000100066	Delaware State University	TV	315.00	202.25	123.25	243.75	352.00	257.25	1178.50	3.15	0.05	0.62	0.16	3.98
1000300077	Dept Of Veterans Affairs Medical Center	TV	99.25	67.50	104.50	49.25	163.00	275.75	660.00	2.40	0.04	0.03	0.12	2.59
1077700233	Diamond Materials LLC - Roving Crusher	SM	48.50	115.00	48.50	90.00	76.00	58.00	387.50	2.12	0.46	0.65	0.11	3.34
1000300069	Diamond Materials, LLC	SM	84.50	83.50	87.50	108.00	143.00	5.50	427.50	5.45	6.11	0.78	1.60	13.94
1000100001	Dover Air Force Base	TV	331.25	441.00	352.75	270.75	697.25	493.50	2255.25	23.23	0.68	0.97	14.89	39.76
1000100118	Dover Downs Gaming & Entertainment, Inc	SM	0.00	44.25	54.00	32.50	22.50	2.00	155.25	1.36	0.01	0.01	0.07	1.46
1000300126	DuPont Chestnut Run	TV	235.50	190.00	85.00	157.75	277.50	258.00	968.25	11.08	0.08	0.09	3.12	14.36
1000300011	DuPont Experimental Station	TV	329.00	331.00	89.75	267.00	378.25	499.50	1565.50	163.64	29.07	254.56	6.39	453.65
1000300051	DuPont Nutrition (Formerly FMC)	TV	326.50	328.25	244.75	601.25	717.00	656.00	2547.25	27.15	18.72	0.19	4.14	50.20
1000500194	Eastern Shore Natural Gas - Bridgeville	SM	97.75	8.00	74.25	20.25	74.25	23.50	200.25	10.36	0.08	0.00	0.73	11.17
1000300462	Eastern Shore Natural Gas-Delaware City	SM	0.00	156.50	365.50	73.00	49.50	116.25	760.75	8.43	5.85	0.01	4.76	19.05
1000300822	First States Investors 5200	SM	0.00	0.00	25.50	27.50	0.00	19.00	72.00	0.13	0.01	0.01	0.01	0.15
1000300279	FMC Corporation Stine-Haskell Research Ctr.	TV	111.50	192.00	168.25	240.50	57.50	254.50	912.75	8.62	0.06	0.07	2.55	11.31
1000300027	Formosa Plastics Corporation	TV	274.50	358.25	289.25	335.75	393.00	248.50	1624.75	33.19	66.16	0.24	32.37	131.96
1000100245	Garrison Energy Center	TV	391.50	366.75					366.75	106.20	102.40	24.30	19.30	252.20
1000300498	GE Energy - Newark, DE	SM	69.50	161.25	51.00	305.25	133.50	163.50	814.50	0.03	0.00	0.00	1.49	1.52
1000100099	Handy Tube Corporation	TV	55.50	27.25	47.50	60.00	323.00	47.50	505.25				3.17	3.17
1000100083	Hanesbrands, Inc	SM	153.00	0.00	0.00	0.00	0.00	42.50	42.50	1.70	0.01	0.01	3.38	5.09
1000100024	Hanover Foods Corporation	TV	57.00	84.00	233.00	182.50	89.00	257.00	845.50	2.92	0.02	0.32	0.16	3.41
1000300017	Hercules Incorporated Research Center	SM	207.25	237.00	349.00				586.00	2.31	0.09	0.07	0.97	3.44
1000300367	Heritage Crystal Clean - Temp Closed (Permit Valid).	SM	0.00	0.00	145.00	2.00	10.25	31.75	189.00	1.48	0.12	0.25	12.60	14.45
1000100067	Hirsh Industries, Inc	TV	85.50	128.50	241.50	43.00	75.50	33.25	521.75	1.84	0.83	0.01	22.80	25.49
1000300934	Holland Mulch, Inc	SM	2.00	54.00					54.00	9.84	1.40	0.008		11.248
1000300899	Honeywell/City of Wilmington	TV	526.00	251.00					251.00	12.39	4.19	15.13	11.20	42.91
1000300508	Howard R Young Correctional Institution	SM	0.00	0.00	10.50	27.50	27.50	18.00	83.50	3.62	0.07	0.07	0.20	3.95
1000300087	IKO Production Wilmington Inc	SM	2.00	1.00	157.00	101.00	186.25	88.75	534.00	5.46	3.20	0.12	4.11	12.89

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Facility ID #	Company Name	Class	2017 Hours	2016 Hours	2015 Hours	2014 Hours	2013 Hours	2012 Hours	Current Fee Total 2012-2016	2014 NO _x (TPY)	2014 PM ₁₀ (TPY)	2014 SO ₂ (TPY)	2014 VOC (TPY)	2014 Total Emissions
1000100011	ILC Dover, LP - Frederica	SM	17.00	34.50	29.00	28.00	15.00	40.50	147.00				2.76	2.76
1000500001	Indian River Power LLC	TV	317.50	638.00	265.25	356.25	553.00	599.25	2411.75	335.66	67.64	754.22	12.37	1169.88
1000300090	James T Vaughn Correctional Center - Smyrna	TV	120.00	382.00	18.25	56.00	166.00	235.25	857.50	0.51	0.03	0.03	0.03	0.60
1000300686	JP Morgan Chase - 4001 Governor Printz Blvd	SM	0.00	0.00	0.00	0.50	0.00	0.00	0.50	8.90	0.63	0.58	0.47	10.58
1000300687	JP Morgan Chase - Bear Christiana Road	SM	50.50	74.50	63.00	20.00	4.00	0.00	161.50	9.79	0.69	0.64	0.52	11.64
1000300804	JP Morgan Chase - Morgan Christiana Center	SM	0.00	0.00	24.50	0.00	4.50	90.00	119.00	7.25	0.51	0.48	0.39	8.62
1000500066	Justin Tanks, LLC	TV	157.00	92.50	113.00	75.00	62.50	79.75	422.75	0.17	0.02	0.21	5.06	5.46
1000100007	Kraft Heinz Foods Inc	SM	149.50	252.50	0.00	0.00	0.00	119.50	372.00	0.14	5.79	0.01	0.01	5.94
1000300115	Kuehne Chemical Company	TV	38.00	148.75	320.75	92.00	148.00	137.00	846.50	1.92	0.00	0.00	0.04	1.97
1000300907	Lars Recycling, LLC	SM	7.25	10.00	0.00				10.00	0.68	0.05	0.04	0.04	0.81
1000300083	Linde LLC	SM	0.00	0.00	17.00	0.00	0.00	89.50	106.50	1.53	0.01	0.01	0.08	1.63
1000300847	MAGCO Inc	SM	37.00	125.75	94.00	0.00	0.00	63.25	283.00	2.48	5.84	0.01	0.13	8.47
1000300291	Magellan Midstream Partners	TV	226.75	94.25	293.50	202.25	56.50	332.75	979.25	1.81	0.20	3.45	30.25	35.71
1000300803	McConnell Johnson - 1201 North Market	SM	0.00	5.00	65.00	0.00	37.25	14.75	122.00	0.69	0.02	0.05	0.04	0.79
1000300383	Medal L P, Air Liquide	SM	422.00	63.00	17.50	29.50	98.50	49.50	258.00	1.06	0.02	0.03	18.32	19.43
1000100081	Metal Masters Foodservice Equipment Co.	SM	0.00	42.75	8.00	2.00	23.00	13.00	88.75	0.01	0.05	0.03	0.00	0.10
1000300516	Micropore, Inc	SM	0.00	0.00	14.75	77.50	12.00	8.50	112.75				1.98	1.98
1000300646	Middletown Materials, LLC	SM	346.50	52.25	16.00	111.00	186.50	38.00	403.75	3.10	0.22	0.20	0.16	3.69
1000500037	Nanticoke Memorial Hospital	SM	49.00	59.50	24.50	35.00	22.50	32.50	174.00	0.13	0.01	0.01	0.01	0.16
1000300919	New Haven Packaging, LLC	SM	5.75	83.50					83.50	1.65	5.12	0.01	0.09	6.87
1000300142	News Journal Company	SM	0.00	0.00	4.50	8.00	41.50	69.00	123.00				0.58	0.58
1000300324	Noramco Inc	TV	315.25	471.25	228.25	220.50	24.00	43.00	987.00	3.00	0.28	0.02	1.34	4.63
1000100127	NRG Energy Center Dover, LLC	TV	99.75	109.25	232.00	629.50	407.25	193.50	1571.50	21.98	6.53	0.86	4.16	33.54
1000500011	Orient Corporation Of America	SM	152.00	97.00	25.50	0.00	42.75	97.00	262.25	2.75	0.01	0.01	0.12	2.89
1000500093	OSG Ship Management, Inc	TV	29.00	111.50	68.25	65.50	319.00	321.75	886.00	0.07	0.00	0.00	43.97	44.04
1000500133	Pats Aircraft Systems	SM	72.50	79.00	40.00	67.50	6.50	68.00	261.00	0.05	0.00	0.00	1.92	1.97
1000500146	Perdue AgriBusiness, LLC	SM	28.50	119.50	24.25	0.00	62.75	46.50	253.00	15.06	8.73	12.59	0.11	36.49
1000100075	Perdue Foods LLC- Milford	SM	2.75	31.00	23.25	0.75	67.00	10.50	132.50	5.47	0.03	0.03	0.32	5.85
1000500003	Perdue Grain & Oilseed LLC - Bridgeville	SM	99.50	96.00	32.00	16.75	148.50	26.25	319.50	5.76	35.37	0.04	0.32	41.49
1000300166	Polymer Technologies, Inc.	SM	11.75	27.25	1.00	7.00	119.00	127.50	281.75	2.19	0.01	0.01	0.05	2.26
1000300509	Port Contractors	SM	11.00	56.50	14.00	69.75	57.50	5.00	202.75		0.66			0.66
1000300288	Prince Minerals, Inc	SM	91.00	146.00	57.00	58.00	6.50	26.00	293.50	0.20	0.51	0.43	0.00	1.14
1000300093	Printpack, Inc	TV	330.50	14.50	278.50	12.50	59.00	80.50	445.00	2.77	0.01	0.02	26.32	29.11
1000100004	Procter & Gamble Dover Wipes Company	SM	4.00	22.25	0.00	0.00	0.00	35.00	57.25	0.01	0.00	0.00	0.00	0.01
1000300906	PS-5 LLC (Community Education Building)	SM	3.50	115.75	24.75				140.50	14.20	0.10	0.10	0.81	15.21
1000300463	Pure Green Industries, Inc Refined Products Company	SM	74.00	129.50	64.75	115.25	15.00	4.00	328.50	0.74	0.35	0.08	0.35	1.53
1077700904	R & M Recycling	SM	55.50	0.00	9.00	36.50	32.00	0.00	77.50	0.51	1.13	0.00	0.03	1.66
1000500081	River II LLC	SM	115.50	26.50	102.00	86.50	72.75	189.00	476.75	5.26	0.11	0.13	1.20	6.71

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1000300033	Rohm & Haas Electronic Materials,Cmp,Inc	TV	599.00	646.50	642.00	313.50	210.00	137.00	1949.00	2.80	0.31	0.03	7.08	10.22
1000500009	Sea Watch International, Ltd	SM	20.00	22.50	30.00	20.50	20.50	19.50	113.00	6.94	0.04	0.04	0.38	7.40
1000300125	Siemens Healthcare Diagnostics - Glasgow	SM	104.50	91.50	189.00	256.50	92.50	109.00	738.50	7.04	0.06	0.10	0.38	7.58
1000500021	SPI Pharma, Inc	SM	61.00	95.00	41.00	47.50	117.50	79.25	380.25	3.18	0.26	0.02	0.17	3.63
1000300133	St Francis Hospital	SM	73.25	0.00	0.00	66.50	40.50	167.00	274.00	3.58	0.02	0.03	0.20	3.83
1000300930	Stratus Visuals LLC	SM	19.50	134.75					134.75				12.85	12.85
1000300021	Sunoco Partners Marketing & Terminals LP	TV	208.50	696.50	285.25	168.00	99.25	95.25	1344.25	6.03	0.00	0.05	52.11	58.20
1000300482	Transflo Terminal Service, Inc	SM	55.00	0.00	36.25	0.00	41.50	49.75	127.50		0.21		0.00	0.21
1000100259	Tri-County Materials, LLC	SM	155.00	0.50	110.75	69.75	46.50	0.00	227.50	3.97	2.31	0.83	2.51	9.62
1000300022	University Of Delaware, Newark	TV	60.25	210.00	121.00	214.00	321.50	378.00	1244.50	28.51	0.72	0.78	15.09	45.09
1000300673	Veolia (Chemours Company Red Lion)	TV	269.50	77.25	57.25	147.50	97.50	142.50	522.00	24.30	0.80	78.77	2.07	105.93
1000300806	VeriSign Inc	SM	0.00	0.00	53.25	0.00	0.00	57.00	110.25	0.50	0.05	0.00	0.02	0.57
1000100152	Warren F Beasley Power Station (DEMEC)	TV	379.00	755.50	227.50	193.75	307.50	336.25	1820.50	3.71	2.61	0.77	21.65	28.74
1000300389	Wilmington Wastewater Treatment Plant	TV	93.75	64.50	212.75	85.25	368.25	104.00	834.75	4.51	0.08	0.70	0.82	6.11
1000300929	WX Delaware Real Estate Holding Company, LLC	TV	101.00	63.00	71.00	0.00	0.00	47.50	181.50	4.62	0.02	0.03	0.23	4.90
										Reflects permitted emission values.				