

State of Delaware

Department of Natural
Resources and
Environmental Control

Division of Air Quality



*Annual
Title V Fee
Committee
Status
Report*

Calendar
Year
2018

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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 twice in 2018:

- July 18, 2018: The Committee met to review the 2017 Annual Report and related strategy accomplishments and initiatives. The committee agreed to meet on a semi-annual basis.
- November 1, 2018: As part of a semi-annual meeting schedule, the Committee met and reviewed the action items resulting from the July 2018 meeting. Included in the review were action items from the 2017 TV Annual Report; the EPA TV Permit Fee Accounting Audit; the Regulation 1102 fee increase initiative and the Joint Training initiative.

The materials from each of these meetings are available for review at:

<https://dnrec.alpha.delaware.gov/air/permitting/major-air-sources/title-v-committee/>

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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Billing

The Title V bills for Calendar Year 2018 were mailed in January 2018. 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 are considered overdue and will be sent three reminders. The third reminder is sent certified mail. A source is considered delinquent if their bill is not paid in full by December 31, 2018. Any delinquent source shall be subject to a 2% compounding monthly interest rate for each month delinquent. 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 2018 Title V Costs.

Table 1: 2018 Title V Costs

Salary	\$2,486,116.25
Travel	\$8,411.25
Contractual ²	\$401,005.59
Supplies	\$89,733.15
Capital Outlay ³	\$100,000.00
Additional Support Services ⁴	\$452,694.53
Small Business Ombudsman Program ⁵	\$88,983.52
Total	\$3,626,944.29

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 2018 may include FY 2019 cost factors.

Note: 2018 Title V Account Annual/Monthly statement is presented in Table 11, Appendix A.

Note: As a result of the “Updated Guidance on EPA Review of Fee Schedules for Operating Permit Programs Under Title V” (March 27, 2018), the Department will carefully review the revised guidance in preparation for the next reauthorization of Title V Fees anticipated in early 2020.

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 The “Capital Outlay” expense (**\$100,00.00**), charged due to delayed grant funding awards, was recouped through the recoding process on February 18, 2019.

⁴ Items covered under “Additional Support Services” include: Information Technology (**\$13,991.88**), the Environmental Crimes Unit (**\$422,417.99**) and OTS Support (**\$16,033.89**).

⁵ Items covered under “Small Business Ombudsman Program” include salary and expenses of 1.0 FTE.

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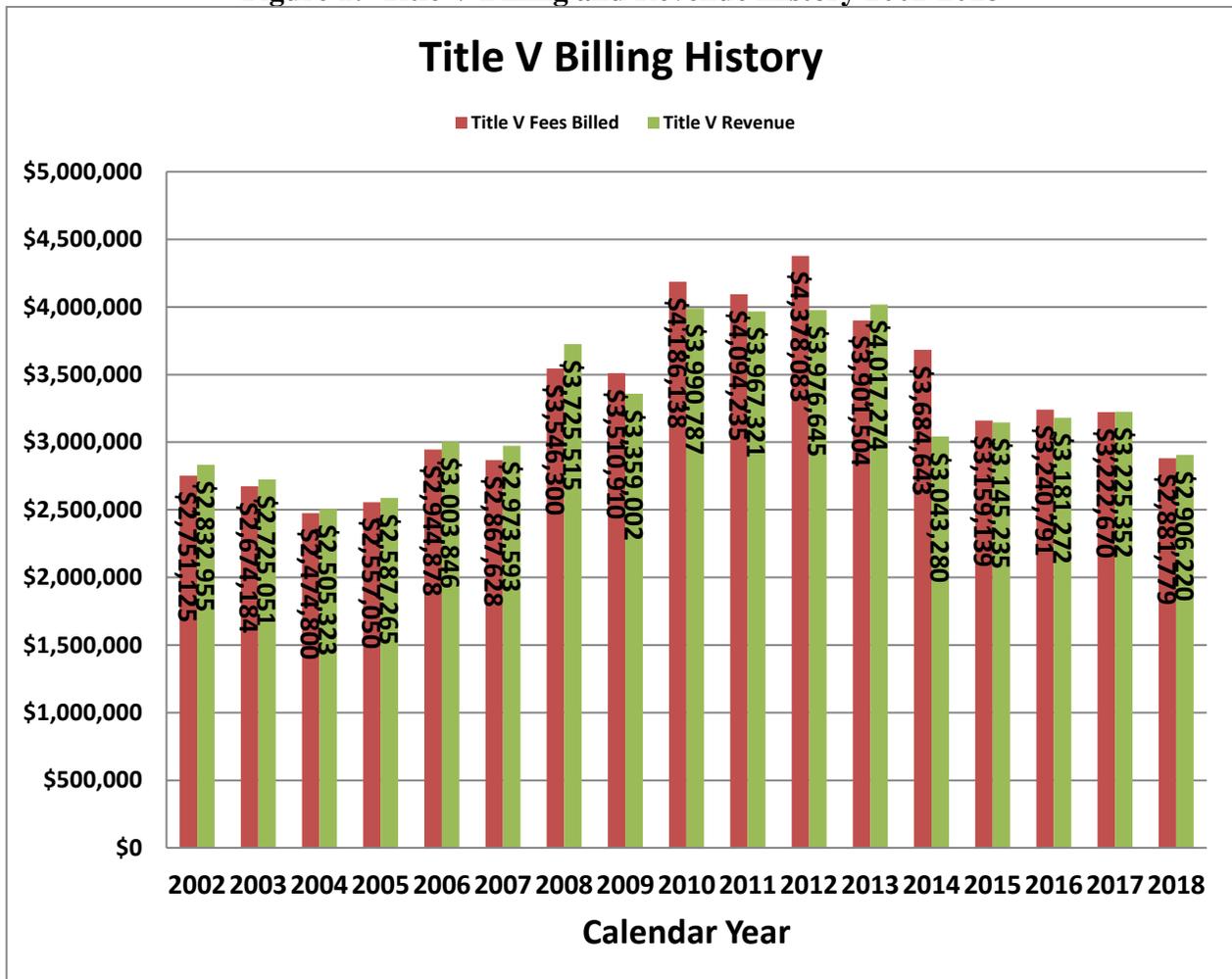
Fees Collected

Title V fees are billed on a calendar year basis (January 1 through December 31) and the 2018 Title V revenue is determined by the actual monies deposited into the Title V account during calendar year 2018 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 2018 for 2019 fees. This makes comparing revenue and fees collected difficult.

For CY2018, **77** Synthetic Minor and **52** Title V facilities were billed. Following the user fee credit program (approximately \$385,000, see Table 7), a total of **\$2,881,779**, including previous years' back fees, was billed. Of the total amount billed, **\$2,849,699.50** was collected and **\$32,079.50** is overdue. The difference of **\$32,079.50** was the result of one facility's non-payment of 2016, 2017 and 2018 fees and includes \$4,029.50 in late fees (see Table 5). Any back fees that are collected in 2019 will be counted towards the 2019 revenue.

The Calendar Year 2018 Title V revenue was **\$2,906,220**. See Figure 1 for a history of Title V billing and revenue since 2002.

Figure 1: Title V Billing and Revenue History 2002-2018



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On December 31, 2018, the Title V cash carryover balance was **\$2,838,432** (see Table 2). Table 3 below captures the carryover balance history, while Table 4 predicts the carryover balance for end of year 2019.

Table 2: Title V Carryover Balance Calendar Year 2018

	2018
2017 Carryover Cash Balance	\$3,559,156
2018 Title V Fee Revenue	\$2,906,220
Sub-Total	\$6,465,376
2018 Total Expenses	-\$3,626,944
2018 Actual Carryover Balance	\$2,838,432

Table 3: Title V Carryover Balance History by Calendar Year

	2013	2014	2015	2016	2017	2018
Total Title V Fee Revenue	\$4,017,274	\$3,043,280	\$3,145,235	\$3,181,272	\$3,225,352	\$2,906,220
Total Expenses	\$3,248,203	\$3,088,668	\$2,979,694	\$3,141,964	\$3,232,830	\$3,626,944
Actual Carryover Balance	\$3,947,277	\$4,243,034	\$4,445,358	\$3,612,029	\$3,559,156	\$2,838,432

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: CY2019 Title V Carryover Balance Projection

	2019 Prediction
2018 Actual Carryover Balance	\$2,838,432
Estimated 2019 Title V Fee Revenue	\$2,766,260
Estimated 2019 Total Expenses	\$3,699,483
Δ Revenue – Expenses	-\$933,223
2019 Projected Carryover Balance	\$1,905,209

The 2019 revenue prediction used in the above calculation was based upon the total amount of actual fees billed for 2019 to include overdue fees, if practical, from previous year billings. The 2019 total expenses prediction was based upon the actual 2018 expenses plus a 2% cost of living adjustment. Please note, the average Division staffing level in CY 2018 was 82%.

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 5 (below) provides a status update for the facilities reported for 2017 and 2018.

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Table 5: 2017 & 2018 Delinquent Facilities

Facility Name	Amount Due	Recovery Actions
Lars Recycling, LLC	\$32,079.50	Includes 2016, 2017 and 2018 overdue balance and late fees. No payments received in 2016, 2017 or 2018. Facility abandoned, permit canceled. Pursuing collection through Department level legal action.
TOTAL	\$32,079.50	

Fee Structure Calendar Years 2018 -2020

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

For the most recent five year history of facility hours and emissions data see Appendix C.

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User Fee Credit Program

As part of the 2018-2020 legislation, a user fee credit was revised for calendar years 2018, 2019, and 2020.

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 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's end of calendar year 2018 staffing level was 79% and 13 positions were vacant. See Table 8 for a breakdown of the staffing levels for the Sections and Groups within the Division. At the time of the publication of this report, the Division had recently completed an internal reorganization to absorb the former Administrative Support Group into other sections within the Division.

Table 8: Division of Air Quality Staffing Levels (12/31/2018)

Section/Group	Authorized	Occupied	Staffing Level
Director's Staff	2.0	2.0	100%
Analytical Support Group	4.0	3.0	75%
Operations Support Group	2.5	1.5	60%
Engineering & Compliance Section	25.5	21.5	84%
Planning Section	27.0	20.0	74%
Total	61.0	48.0	79%
Temporary Positions	2.0	0.0	0%
Seasonal Positions	2.0	2.0	100%

During 2018, eight full-time employees separated or retired and six additional full-time employees were hired. See Table 9 for a list of hiring actions taken in calendar year 2018.

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Table 9: Calendar Year 2018 Hiring Actions

Date	Name	Source	Position	Section	Funding
5/29/2018	Angelina Rogers	External	Analytical Chemist	Planning	NM/TV
7/23/2018	Christian Wisniewski	External	Engineer	Planning	RGGI
7/23/2018	Alexa Murphy	External	Engineer	Eng/Comp	Grant/TV
7/30/2018	J. Adam Whapham	External	Engineer	Eng/Comp	Grant/TV
8/6/2018	Ajo Rabemiarisoa	External	Engineer	Planning	Gen Fund
*10/29/2018	Rachel Zobel	External	Env Scientist	Planning	Grant/TV

* Separated from DAQ in January 2019.

In 2017, state-wide personnel reductions decreased the Division’s authorized positions from 65 to 61 FTEs with a Departmental hiring cap of 57 employees. The Department rescinded the hiring cap in January 2019.

The DAQ organizational chart, dated April 1, 2019, is depicted in Appendix B.

PROGRAM ACCOMPLISHMENTS

Title V Permitting Activities 2018

DAQ is responsible for all permitting activities at Title V and Synthetic Minor facilities. In calendar year 2018, the following permitting activities were accomplished:

- 1 new Title V Permit was issued;
- 10 Title V Permit Renewals were issued;
- 2 Title V Significant Permit Amendments were issued;
- No Public Hearings for Title V Permits were held;
- 3 Synthetic Minor Permits were issued;
- 12 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 2018, the Division of Air Quality issued Title V Permit Renewals in 502 days of complete application receipt on average. This figure is lower than it was in 2017 and is below 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 2018, Synthetic Minor permit modifications were issued within 104 days from complete application receipt on average. Three new Synthetic Minor permits were issued 419 days on average from complete application receipt. The three new Synthetic Minor permits included one new Synthetic Minor facility and two facilities that were changing from Title V to Synthetic Minor. The new Synthetic Minor permit was issued in 195 days of complete application receipt, which is higher than the target. The two facilities that

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were transitioning to Synthetic Minor continued to operate under their Title V permit until issuance of the Synthetic Minor permit therefore there was no lapse in operation for the facilities.

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 2018, there were four facilities and twelve permits utilizing this procedure.

During 2018 Engineering and Compliance hired three new engineers (two Engineer I positions and one Engineer III position) to fill existing vacancies. These staff additions have been beneficial to the section in terms of workload allocation and completion. In the coming years, we anticipate several additional staff separations and we are taking time to complete necessary succession planning to ensure the ongoing success of the program.

2018 Title V Compliance Activities

Many Title V related compliance activities are undertaken by the DAQ each year. These activities include on-site compliance evaluations or inspections, stack tests, and report reviews. In calendar year 2018, the following compliance activities were undertaken:

- 37 on-site compliance evaluations were conducted at Title V facilities;
- 154 stack tests were conducted at Title V facilities;
- 182 report reviews were conducted for Title V facilities;
- 25 on-site compliance evaluations were conducted at Synthetic Minor facilities;
- 28 stack tests were conducted at Synthetic Minor facilities; and
- 21 report reviews were conducted for Synthetic Minor facilities.

2018 Title V Enforcement Activities

If the compliance activities described above indicate that a facility is not in compliance with requirements, the DAQ 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 2018, the following enforcement activities were completed (please note that this does not include pending enforcement activities):

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

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 Section of the Division of Air Quality accomplished the following Title V related planning activities in calendar year 2018:

- State Implementation Plan (SIP) activities:
 - Submitted the Ozone (2015) Infrastructure SIP to EPA for review and approval.
 - Continued to challenge in court EPA's denial of the four CAA Section 126 petitions that Delaware 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 to challenge in the D.C. Circuit Court, EPA's Cross State Air Pollution Rule (CSAPR) update. EPA continues to rely on delay, not legal authority, reason or science, to again deny downwind states relief from upwind ozone pollution mandated by the Clean Air Act.
 - Continued to support Delaware Attorney General in a petition for review of the EPA's Startup, Shutdown and Malfunction SIP Call.
- Regulatory Development Activities:
 - Finalized amendments to 7 DE Admin. Code 1101, Definitions; 1102, Permits Section 2 - Outdoor Painting and Sandblasting Equipment; 1114, Visible Emissions; 1117, Source Monitoring and 1136, Acid Rain.
 - Began work on amendments to 7 DE Admin. Code 1150, Outer Continental Shelf Air Regulations.
 - Began work on amendments to 7 DE Admin. Code 1126 and 1131, Motor Vehicle Inspection Programs for Sussex, Kent and New Castle Counties.
 - Submitted to EPA for approval, the 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.

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- Via an Emergency Order amended 7 DE Admin. Code 1140, Low Emission Vehicle 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:
 - Submitted Delaware's third year PM Advance Plan and progress report.
 - Continued work on Delaware's second Regional Haze SIP.
 - Finalized the Community-based Special Study with the Moveable Monitoring Platform (MMP) study at Eden Park.
 - 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.

Title V Emission Inventory Activities

The Emission Inventory Group is part of the Planning Section 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 2018:

- Contacted all Title V and Synthetic Minor permitted facilities required to report 2017 emissions of criteria pollutants and facilitated updates to their on-line emissions reporting structure;
 - All Synthetic Minor facilities are required to report emissions every three years to meet federal reporting requirements of all emission sources in the State;
 - Additionally, all Synthetic Minor facilities are required to report emissions every three years to determine the user fee for the subsequent three-year TV billing cycle;
- Collected 2017 point source data from 126 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 2017 point source data to EPA's Emissions Inventory System.

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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 2018, the Air Monitoring Group accomplished the following Title V related activities:

- Measured the ambient (outdoor) concentrations of the criteria air pollutants along with selected weather parameters. The ambient monitoring network consists of twelve 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 2018, 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. This study expanded to include analysis of heavy metals using a continuous metal analyzer for TSP in October of 2018 to identify local sources.
- Conducted small scale community saturation study for particulate and air toxics concerns along the Route 9 corridor.
- Participated in community environmental meetings concerned with the Route 9 corridor and air quality issues in affected communities.
- 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).

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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;
- 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)
- Delaware Envirothon planning committee
- Division of Air Quality's Envirothon Project Team
- Coordinates the committee that reviews incinerator ban applicability status decision 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 2018 the SBO conducted the following activities:

- Conducted five Regulatory Advisory Service (RAS) meetings.
- Provided permit and compliance assistance to 39 entities through:
 - 54 phone calls made and received;
 - 313 emails sent and received; and
 - 1 site visit
- 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.
- Communicated with representatives of local chambers of commerce, trade associations and the Delaware Division of Small Business.
- As the Department's Registrar, worked with Department staff to ensure the Regulatory Development Process steps were being followed. A total of 16 Start Action Notices initiating the process were approved. A total of 55 items were submitted to the State Registrar's office for publication in the Monthly Register of Regulations: 19 proposals, 21 finals, 7 emergency regulations, 3 general notices, 2 errata, and 3 State Implementation Plans (SIPs).

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- Participated in a variety of outreach events:
 - Statewide County is *Open for Business* events held monthly in each county. Attended 16 events and made 91 contacts with business entrepreneurs interested in learning about DNREC and potential permit/regulation requirements.
 - Delaware Envirothon - sponsored by the Del. Assoc. of Conservation Districts (Apr. 26)
 - 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 two hour training session; coordinating the development/updating of competition test questions; and coordinating staff involvement for the competition. The 2018 air quality theme was mobile sources.
 - Training session was held on Saturday, February 3, 2018 and was attended by 27 high school students and 4 advisors representing 8 high schools in New Castle and Kent counties and one 4H club.
 - Worked with Envirothon air quality project team to implement the second ever extra credit air quality project. Thirteen teams created a plan to reduce mobile source emissions for a given scenario. Project components included a written report describing the plan, a calculation sheet that included a final value of reduced emissions, and a poster showcasing the plan.

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Other Special Accomplishments and Projects

The DAQ continues to execute its strategy with focus upon the division key priorities. These are listed and detailed in Table 10 below.

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.

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. Four additional staff members have been identified to receive Six-Sigma Green Belt certification training February – May 2019.

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.

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.

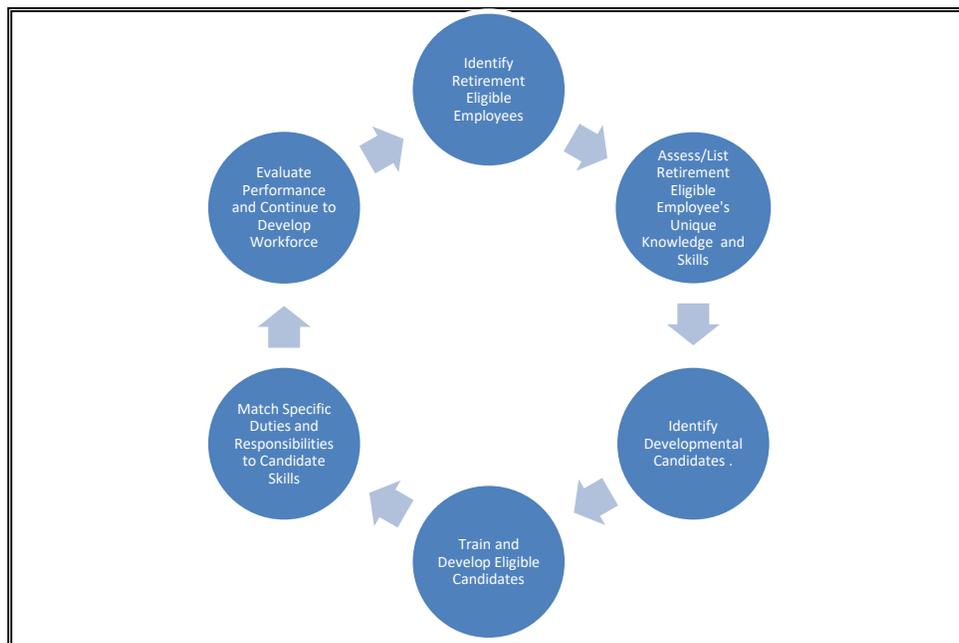


Figure 3: DAQ Succession Planning Initiative

Department ECM Activities

The Department is currently undertaking several projects that comprise its overall ECM Initiative. These include an electronic document management system, called DNRECTory, and e-Permitting. The DAQ has been the lead division in the development and implementation of DNRECTory. The

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DAQ was the first division to “go-live” on March 4, 2019, and continues to work with the Department team to identify and resolve issues to help forge smooth transitions for the other divisions. The DAQ participates in the e-Permitting project and area source permitting will be the primary focus for initial e-Permitting implementation. Electronic permitting capabilities for the rest of the Regulation 1102 stationary sources and Title V facilities will follow. Electronic application payments are a part of the e-Permitting project and that will be implemented division-wide for all sources when it becomes available.

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 2018, the Division of Air Quality participated in the following special activities:

- Management and administrative activities including:
 - Division Safety Council, comprised of a team of DAQ staff volunteers, continues to promote safety, prevent accidents and protect our staff and customers. Their ability to triage, investigate and mitigate safety concerns continues to insure a safe working environment.
- Participated in outreach activities including:
 - For a seventh 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 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;

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- 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; and
- Coordinated with the Energy and Climate Division on energy policy issues.

Appendix A: 2018 Title V Monthly Expense and Revenue

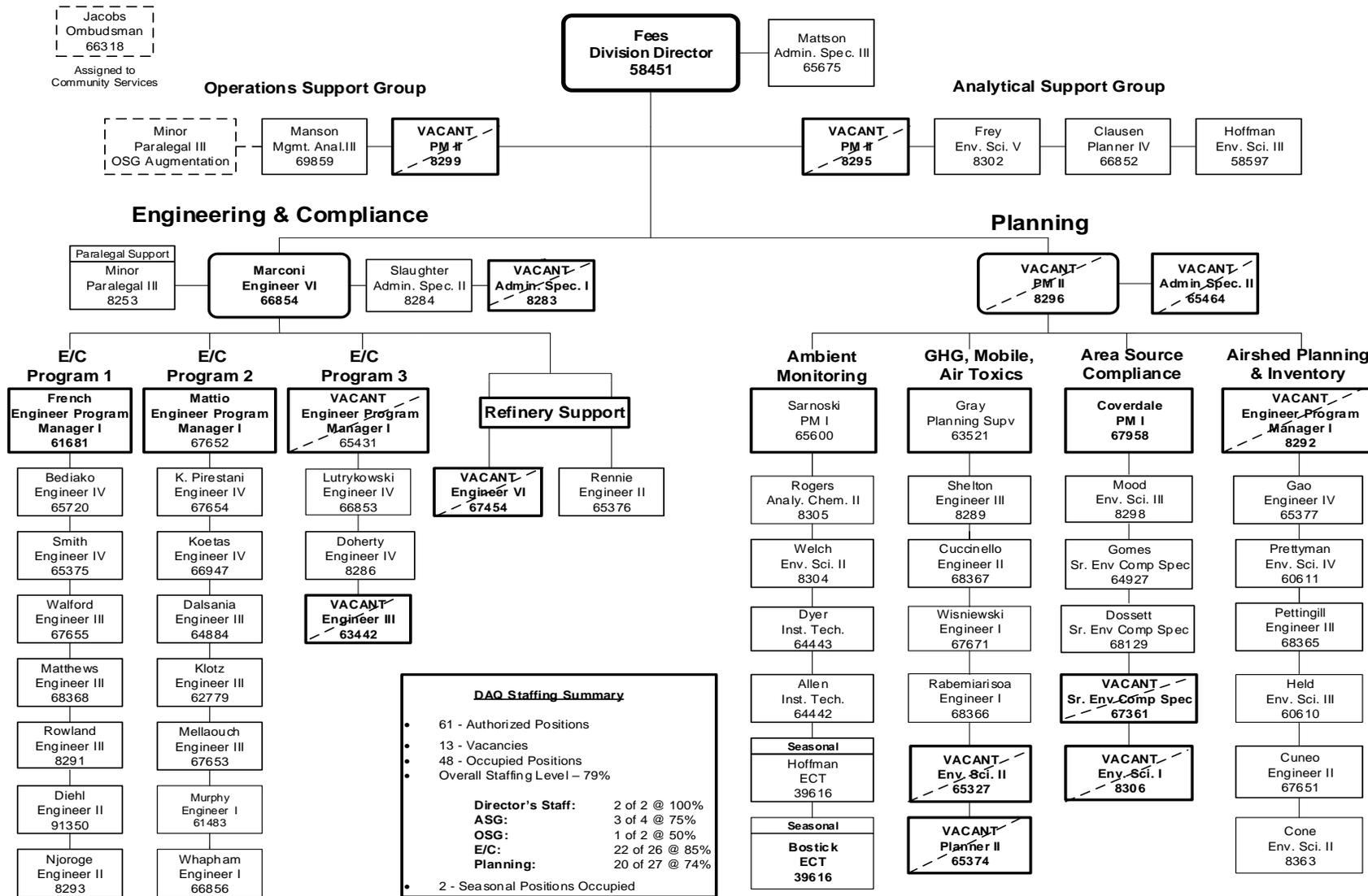
Table 11: 2018 Title V Account Expenses and Revenue								
MONTH	EXPENSES						INTEREST	REVENUE
	Salary	Energy	Travel	Contractual	Supplies	Capital Outlay		
January	\$194,274.83	\$0.00	\$425.20	\$277,948.19	\$5,831.58	\$0.00	\$1,684.16	\$54,742.16
February	\$177,190.73	\$0.00	\$0.00	\$288,932.65	\$7,587.39	\$0.00	\$1,114.19	\$2,073,564.19
March	\$272,677.42	\$0.00	\$522.46	\$37,487.78	\$6,816.11	\$0.00	\$711.47	\$307,717.72
April	\$171,775.71	\$0.00	\$135.33	\$29,023.55	\$8,286.04	\$100,000.00	\$1,000.11	\$195,945.84
May	\$216,866.80	\$0.00	\$579.55	\$163,080.90	\$24,369.80	\$0.00	\$593.48	\$70,597.95
June	\$193,913.22	\$0.00	\$22.54	\$24,358.51	\$354.22	\$0.00	\$840.91	\$12,632.16
July	\$174,232.47	\$0.00	\$1,243.16	\$21,216.15	\$6,637.85	\$0.00	\$848.64	\$60,970.87
August	\$278,010.19	\$0.00	\$887.63	\$15,736.47	\$9,410.39	\$0.00	\$1,477.37	\$40,349.37
September	\$190,290.68	\$0.00	\$3,760.86	\$21,327.19	\$11,793.77	\$0.00	\$2,639.13	\$17,225.38
October	\$197,704.60	\$0.00	(\$631.70)	\$14,334.85	\$5,236.40	\$0.00	\$1,794.10	\$59,681.10
November	\$204,271.65	\$0.00	\$230.98	\$21,495.81	\$1,093.55	\$0.00	\$1,608.20	\$1,608.20
December	\$214,907.95	\$0.00	\$1,235.24	\$27,741.59	\$2,316.05	\$0.00	\$2,732.66	\$11,184.66
2018 Totals	\$2,486,116.25	\$0.00	\$8,411.25	\$942,683.64	\$89,733.15	\$100,000.00	*\$17,044.42	\$2,906,219.60
2018 Total Expenses	\$3,626,944.29							

*Total interest included in revenue totals.

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Appendix B: DAQ Organizational Chart (April 1, 2019):

Division of Air Quality (April 1, 2019)



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Appendix C: Facility Hours and Emissions History: Depicts the most recent 7-year history of hours expended on each facility and the 2014 baseline emissions inventory.

Facility ID #	Company Name	Class	2018 Hours	2017 Hours	2016 Hours	2015 Hours	2014 Hours	2013 Hours	2012 Hours	Current Fee Total CY12-16	2014 NO _x (TPY)	2014 PM ₁₀ (TPY)	2014 SO ₂ (TPY)	2014 VOC (TPY)	2014 Total
1000300049	1007 Market St. Condominium Association	TV	214.00	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	110.75	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	44.25	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	203.00	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	119.25	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	15.75	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	3.00	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	2.50	0.00	62.00					62.00		8.00			8.00
1000100247	Ameresco Delaware Energy - Sandtown	TV	231.75	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	251.25	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	88.50	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	10.75	66.00	41.00	155.50	94.75	245.00	158.25	694.50	4.37	0.16	0.03	1.37	5.92
1000300107	AstraZeneca Pharmaceuticals, LLC-Newark	SM	100.50	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	454.00	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	18.00	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	32.50	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	26.00	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	1.25	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	2.25	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	98.75	26.00	65.00	0.00	0.00	0.00	6.50	71.50	2.36	0.17	0.14	0.13	2.79
1000300106	Brandywine Investment Group,LLC and Brandywine Investment Group II,LLC	SM	165.50	8.50	96.50	78.50	397.50	226.00	218.25	1016.75	3.25	0.04	0.04	0.17	3.50
1000300317	Calpine Mid-Atlantic Generation-Christiana Energy Ctr.	TV	133.50	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	65.50	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	421.50	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	289.00	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	86.50	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	126.25	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	0.00	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	135.00	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	139.25	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	172.25	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	89.75	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	0.00	7.50	3.00	3.25	2.50	10.00	0.00	18.75				4.36	4.36
1077700162	Coker Concrete Roving Crusher	SM	2.00	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	27.00	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	8.50	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	0.00	11.50	29.25	66.00	0.00	0.00	55.50	150.75	1.88	2.60	0.23	2.33	7.03
1077700800	Corrado Construction Co LLC	SM	28.50	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	654.50	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	42.25	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	259.25	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	3794.25	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	84.00	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	38.25	1.50	13.50	46.50	32.25	102.75	144.75	339.75	2.58	0.04	0.04	0.14	2.80

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Appendix C: Facility Hours and Emissions History: Depicts the most recent 7-year history of hours expended on each facility and the 2014 baseline emissions inventory.

Facility ID #	Company Name	Class	2018 Hours	2017 Hours	2016 Hours	2015 Hours	2014 Hours	2013 Hours	2012 Hours	Current Fee Total CY12-16	2014 NO _x (TPY)	2014 PM ₁₀ (TPY)	2014 SO ₂ (TPY)	2014 VOC (TPY)	2014 Total
1000300827	Delaware Park Horse Racing Track	SM	0.00	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	240.75	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	141.50	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	170.50	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	616.50	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	177.25	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	70.00	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	34.50	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	50.50	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	85.50	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	124.00	0.00	44.25	54.00	32.50	22.50	2.00	155.25	1.36	0.01	0.01	0.07	1.46
1000300011	DuPont Experimental Station	TV	305.25	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	192.50	326.50	328.25	244.75	601.25	717.00	656.00	2547.25	27.15	18.72	0.19	4.14	50.20
1000300126	DuPont Specialty Products USA, LLC	TV	277.75	235.50	190.00	85.00	157.75	277.50	258.00	968.25	11.08	0.08	0.09	3.12	14.36
1000500194	Eastern Shore Natural Gas - Bridgeville	SM	155.00	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	141.00	0.00	156.50	365.50	73.00	49.50	116.25	760.75	8.43	5.85	0.01	4.76	19.05
1000100127	Energy Center Dover, LLC	TV	307.25	99.75	109.25	232.00	629.50	407.25	193.50	1571.50	21.98	6.53	0.86	4.16	33.54
1000300822	First States Investors 5200	SM	1.00	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	102.00	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	50.50	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	451.00	391.50	366.75					366.75	106.20	102.40	24.30	19.30	252.20
1000300498	GE Energy - Newark, DE	SM	98.50	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	HandyTube Corporation	TV	29.50	55.50	27.25	47.50	60.00	323.00	47.50	505.25				3.17	3.17
1000100083	Hanesbrands, Inc	SM	7.00	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	297.50	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	366.25	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	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	61.00	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	5.25	2.00	54.00					54.00	9.84	1.40	0.008		11.248
1000300899	Honeywell/City of Wilmintgon	TV	305.75	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	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	92.50	2.00	1.00	157.00	101.00	186.25	88.75	534.00	5.46	3.20	0.12	4.11	12.89
1000100011	ILC Dover, LP - Frederica	SM	21.50	17.00	34.50	29.00	28.00	15.00	40.50	147.00				2.76	2.76
1000500001	Indian River Power LLC	TV	344.25	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	19.00	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	30.50	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	0.00	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	18.50	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	163.25	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	0.00	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	4.00	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	0.00	7.25	10.00	0.00				10.00	0.68	0.05	0.04	0.04	0.81
1000300083	Linde LLC	SM	64.75	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	15.50	37.00	125.75	94.00	0.00	0.00	63.25	283.00	2.48	5.84	0.01	0.13	8.47

**2018 Title V Fee Committee Status Report
May 1, 2019**

Appendix C: Facility Hours and Emissions History: Depicts the most recent 7-year history of hours expended on each facility and the 2014 baseline emissions inventory.

Facility ID #	Company Name	Class	2018 Hours	2017 Hours	2016 Hours	2015 Hours	2014 Hours	2013 Hours	2012 Hours	Current Fee Total CY12-16	2014 NO _x (TPY)	2014 PM ₁₀ (TPY)	2014 SO ₂ (TPY)	2014 VOC (TPY)	2014 Total
1000300291	Magellan Midstream Partners	TV	345.75	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	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	250.00	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	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	2.00	0.00	0.00	14.75	77.50	12.00	8.50	112.75				1.98	1.98
1000300646	Middletown Materials, LLC	SM	3.00	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	59.00	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	4.00	5.75	83.50					83.50	1.65	5.12	0.01	0.09	6.87
1000300142	News Journal Company	SM	20.50	0.00	0.00	4.50	8.00	41.50	69.00	123.00				0.58	0.58
1000300324	Noramco Inc	TV	353.50	315.25	471.25	228.25	220.50	24.00	43.00	987.00	3.00	0.28	0.02	1.34	4.63
1000500011	Orient Corporation Of America	SM	7.50	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	120.00	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	190.00	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	100.25	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	2.50	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	94.00	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	32.00	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	63.00	11.00	56.50	14.00	69.75	57.50	5.00	202.75		0.66			0.66
1000300288	Prince Minerals, Inc	SM	77.50	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	94.00	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	0.00	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	1.25	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	12.50	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	10.50	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	0.00	115.50	26.50	102.00	86.50	72.75	189.00	476.75	5.26	0.11	0.13	1.20	6.71
1000300059	Rogers Corporation	SM	101.00	88.00	3.50	41.00	192.50	114.50	16.50	368.00	1.53	2.88	0.01	6.37	10.79
1000300033	Rohm & Haas Electronic Materials,Cmp,Inc	TV	188.00	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	20.50	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	143.00	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	34.00	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	0.00	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	34.50	19.50	134.75					134.75				12.85	12.85
1000300021	Sunoco Partners Marketing & Terminals LP	TV	136.00	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	9.00	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	33.00	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	108.50	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	460.00	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	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	249.50	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	18.50	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	8.50	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.				

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