



## Assigning Time to Core Objectives

- The Branch specific core objectives were linked to specific activities to complete the objectives
- The time required to complete each activity was based upon timesheet information, interviews with AQMS staff, and queries into the permit tracking system.



## Assigning Time to Core Objectives

- For example, the Engineering & Compliance Branch identified 8 objectives to fulfill its mission
- These 8 objectives were then further broken up into activities to meet the objective



## E&C Objective 1

- Implement the State of Delaware air quality regulations and the Clean Air Act (“CAA”), as amended.
  - Permitting Activities
  - Compliance Activities
  - Enforcement Activities



# E&C Objective 1

- **Permitting Activities**
  - Registrations
  - Natural Minor Permitting
  - Synthetic Minor Permitting
  - Title V Permitting
  - Reg. 1125 Permitting



# E&C Objective 1

## ■ Natural Minor Permitting

- Construction
- Operation
- Amendments

## ■ Synthetic Minor Permitting

- Construction
- Operation
- Amendments



# E&C Objective 1

## ■ Title V Permitting

### ● Operation

- Initial Operating Permits
- Renewal Permits

### ● Amendments

- Administrative Amendments
- Minor Permit Modifications
- Significant Permit Modifications

## ■ Reg. 1125 Permitting

- PSD Permitting
- EOP Permitting



# E&C Objective 1

## ■ Compliance Activities

- On-Site Partial Compliance Evaluations
- Off-Site Partial Compliance Evaluations
- On-Site Full Compliance Evaluations
- Construction to Operation Inspections
- VOC (Coating) Sampling
- Stack Testing
- Report Reviews
- Incident Investigations
- Identifying New Sources
- Tracking



# E&C Objective 1

## ■ Enforcement Activities

- Notice of Violation Preparation
- Enforcement Panel Package Preparation
- Enforcement Panel Presentations
- Order Preparation
- Draft Order Review
- Negotiations
- Stipulated Penalties
- Environmental Improvement Project Reviews
- Coordinating with Other Branches and Legal
- Enforcement Close-Outs
  - No Further Action
  - Enforcement Orders
- Tracking
- Press-Releases





## E&C Objective 2

- Assist other Section staff in the attainment and maintenance of Ambient Air Quality Standards (“AAQS”) with special emphasis on the control of ozone and PM<sub>2.5</sub> precursors.
  - Reviewing of Banking & Trading
  - Participation in Regulation Development Activities
  - Assisting Emission Inventory
  - SIP Work



## E&C Objective 3

- Protect Delaware citizens from the potential impact of Hazardous Air Pollutants (“HAPS”).
  - Air Toxics Review and Coordination with Other Branches
  - Air Toxics Tracking
  - Planning for and Implementing Future Air Toxics Regulations



## E&C Objective 4

- Reduce emissions that contribute to acid rain.
  - Develop and Issue Title IV (Acid Rain) Permits
  - NO<sub>x</sub> Budget Program
  - Review Title IV (Acid Rain) Permits



## E&C Objective 5

- Assist other Branches, Sections, and Agencies across media to protect public health, welfare, and the environment.
  - Multi-Media Inspections
  - Communicate/Cooperate With Other Branches on Permitting, Compliance and Enforcement Issues
  - Soil Vapor Extraction Letters
  - Enforcement Investigations – Providing Information to EPO's
  - Cooperate/Coordinate with EPA
  - Cooperate with Public Health
  - Coordinate with Public Affairs
  - Coastal Zone Permitting



## E&C Objective 6

- Work with communities and businesses to provide information, address air quality concerns, and work towards and implement solutions.
  - Claymont Engineer
  - Delaware City Engineer
  - Local Community Issues
  - Public Education & Outreach
  - Interact with Press
  - Workshops for Regulated Community
  - Public Hearings
  - Addressing Individual Citizen/Elected Official Complaints
  - FOIA and Confidentiality



## E&C Objective 7

- Influence National and Regional air quality policy.
  - Participate on MARAMA Committees
  - Participate on NACAA Committees
  - Comment on Regulations Under Development
  - Comment on EPA Information Collection Requests
  - Cooperate/Coordinate with EPA Region III and Headquarters



## E&C Objective 8

- Perform administrative responsibilities.
  - Timekeeping
  - Workload Analysis/Title V Fee Committee
  - Value Stream Mapping Initiative
  - Creating a Culture of Trust
  - Department and Division Awards Ceremonies
  - Personnel/Hiring
  - Performance Reviews
  - Source Assignments
  - Staff Meetings
  - Document Management
  - Fleet Vehicle Management
  - Administer the Training Policy and Plan
  - Participate on Division/Department Committees
  - Training
  - Tracking
  - Covering for Receptionist

# Assigning Time to Activities

- Once the activities were listed, the amount of time required for each activity was calculated.
- For example, let's review how the time to process Title V Renewals was calculated





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	A	B	C	D	E	F	G	H	I	J	K	L	
30	2. RENEWAL OPERATING PERMITS (estimate 17 in 2007)								17				
31													
32									Hours				
33								Engineer	PMI	PMII	ASII		
34		Administrative completeness determination letter						7.5	0	0	0		
35		Technical completeness review						37.5	0	0	0		
36		Additional information request						4	0	0	0		
37		Draft permit and technical memorandum						75	0	0	0		
38		Internal discussion and preparation						2	1	1	0		
39		Draft advertisement/State notifications/EPA email/Company letter						2	0	0	0		
40		Internal review						0	3	0.5	0		
41		Advertise draft permit						0	0	0	0.5		
42		Prepare reconciliation table/proposed permit and memorandum						6	0	0	0		
43		Draft EPA email and Company letter						0.5	0	0	0		
44		Internal review						0	2	0.5	0		
45		Draft final permit and memorandum						3	0	0	0		
46		Draft EPA letter and Company letter						0.5	0	0	0		
47		Internal review						0	1	0.5	0		
48								138	7	2.5	0.5		
49													
50													
51								Engineer	PMI	PMII	ASII		
52								<b>TOTAL HOURS/FTE</b>	<b>104.6364</b>	<b>39.66667</b>	<b>42.5</b>	<b>8.5</b>	
53								Engineer at 21.5 FTE	<b>109.1163</b>				

Objective 1(i) / Objective 1(ii) / Objective 1(iii) / **Objective 1(iv)** / Objective 1(v)

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# Assigning Time to Positions

- The time required to complete each activity was broken down by position number and assigned to individual AQMS positions.
- The time assigned to each position was then used to calculate the FTE's required to complete each objective.
- 1,650 hours was used to define an FTE. This number is based upon the actual hours an employee has to work in a year (1,950 hours minus state holidays and leave averages).



	A	B	E	F	G	H	I	J	K
4									
5	Position Number	Responsibility	Hours Assigned to Responsibility	Salary Cost	OEC Cost	Total Cost	Objective		
6	65376	Permitting Activities - Registrations	3.7	\$106.54	\$37.42	\$143.96	1		
7	65376	Permitting Activities - Natural Minor Construction	293.4	\$8,448.38	\$2,967.32	\$11,415.70	1		
8	65376	Permitting Activities - Natural Minor Operation	13.8	\$397.37	\$139.57	\$536.93	1		
9	65376	Permitting Activities - Natural Minor Amendments	64.8	\$1,865.90	\$655.36	\$2,521.26	1		
10	65376	Synthetic Minor Permitting - Construction	35.5	\$1,022.21	\$359.03	\$1,381.24	1		
11	65376	Synthetic Minor Permitting - Operation	2.4	\$69.11	\$24.27	\$93.38	1		
12	65376	Synthetic Minor Permitting - Amendments	33.3	\$958.86	\$336.78	\$1,295.65	1		
13	65376	Title V Permitting - Initial Operating Permits	20.7	\$596.05	\$209.35	\$805.40	1		
14	65376	Title V Permitting - Renewals	104.6	\$3,011.93	\$1,057.88	\$4,069.81	1		
15	65376	Title V Permitting - Amendments - Administrative	4.1	\$118.06	\$41.47	\$159.52	1		
16	65376	Title V Permitting - Amendments - Minor	5	\$143.97	\$50.57	\$194.54	1		
17	65376	Title V Permitting - Significant Permit Modifications	168	\$4,837.52	\$1,699.08	\$6,536.59	1		
18	65376	Compliance Activities - On-Site Full Compliance Evaluations	190.88	\$5,496.34	\$1,930.48	\$7,426.82	1		
19	65376	Compliance Activities - Stack Tests	8.3	\$239.00	\$83.94	\$322.94	1		

	A	B	E	F	G	H	I	J	K
46	65376	Addressing Complaints	5.5	\$158.37	\$55.62	\$214.00	6		
47	65376	FOIA and Confidentiality	0.33	\$9.50	\$3.34	\$12.84	6		
48	65376	Timekeeping	13	\$374.33	\$131.48	\$505.81	8		
49	65376	Value Stream Mapping	6	\$172.77	\$60.68	\$233.45	8		
50	65376	Department and Division Awards Ceremonies	13.5	\$388.73	\$136.53	\$525.26	8		
51	65376	Personnel/Hiring	10	\$287.95	\$101.14	\$389.08	8		
52	65376	Performance Reviews	3	\$86.38	\$30.34	\$116.72	8		
53	65376	Staff Meetings	52	\$1,497.33	\$525.91	\$2,023.23	8		
54	65376	Document Management	164.8	\$4,745.37	\$1,666.72	\$6,412.09	8		
55	65376	Fleet Vehicle Management	5.3	\$152.61	\$53.60	\$206.21	8		
56	65376	Weekly Reports	13	\$374.33	\$131.48	\$505.81	8		
57	65376	Training	37.5	\$1,079.80	\$379.26	\$1,459.06	8		
58	65376	Mentoring/Coaching	0	\$0.00	\$0.00	\$0.00	8		
59	65376	Training	37.5	\$1,079.80	\$379.26	\$1,459.06	8		
60	<b>TOTAL</b>		<b>1647.81</b>	<b>\$47,448.26</b>	<b>\$16,665.23</b>	<b>\$64,113.49</b>			
61									
62		Employee Base	\$56,149.74						
63		Employee O&C	\$10,731.45						

# Assigning Time to Positions

- Detailed information on how each activity was assigned to individual position numbers can be found on the attached CD.
- The results of this analysis can be found in Section 3.0 – AQMS Workload Analysis (Short Term).



# Results of Workload Analysis

Branch/Unit	Allocated Positions	Needed Positions	Increase Above Allocation	Current Vacancy	Filled Positions	Net Increase Required
Administrator's Office	6.0	7.7	1.7	2.0	4.0	+3.7
Air Surveillance Branch	15.0	12.8 <sup>1</sup>	-2.2	3.0	12.0	+0.8 <sup>1</sup>
Engineering and Compliance	33.0	34.7	1.7	7.0	26.0	+8.7
Planning	21.0	28.4	7.4	6.0	15.0	+13.4
Totals	75	83.6	8.6	18.0	57.0	+26.6

<sup>1</sup> This total does not include the vacant Program Manager Position

# Calculating Staffing Cost

- Once the total time to complete each objective was assigned to each position, the cost to meet each objective was calculated.
- The cost to meet each objective was calculated using each individual position's hourly cost.



# Calculating Staffing Cost

- Each individual position's hourly cost is reflective of both salary and Other Employee Costs (OECs).
- Each individual position's 2008 hourly cost reflects the standard 2% annual raise and an increase in OECs by the Consumer Pricing Index from 2007 costs.
- The leave cost was then added to the total staffing cost in the final analysis.





	A	B	E	F	G	H	I	J	K
52	65376	Performance Reviews	3	\$86.38	\$30.34	\$116.72	8		
53	65376	Staff Meetings	52	\$1,497.33	\$525.91	\$2,023.23	8		
54	65376	Document Management	164.8	\$4,745.37	\$1,666.72	\$6,412.09	8		
55	65376	Fleet Vehicle Management	5.3	\$152.61	\$53.60	\$206.21	8		
56	65376	Weekly Reports	13	\$374.33	\$131.48	\$505.81	8		
57	65376	Training	37.5	\$1,079.80	\$379.26	\$1,459.06	8		
58	65376	Mentoring/Coaching	0	\$0.00	\$0.00	\$0.00	8		
59	65376	Training	37.5	\$1,079.80	\$379.26	\$1,459.06	8		
60	<b>TOTAL</b>		<b>1647.81</b>	<b>\$47,448.26</b>	<b>\$16,665.23</b>	<b>\$64,113.49</b>			
61									
62		Employee Base	\$56,149.74						
63		Employee OEC	\$19,721.45						
64	TOTAL - OBJECTIVE 1		1141.88	\$32,880.14	\$11,548.48	\$44,428.61			
65	TOTAL - OBJECTIVE 2		109.4	\$3,150.14	\$1,106.42	\$4,256.57			
66	TOTAL - OBJECTIVE 3		11.5	\$331.14	\$116.31	\$447.45			
67	TOTAL - OBJECTIVE 4		0	\$0.00	\$0.00	\$0.00			
68	TOTAL - OBJECTIVE 5		15.3	\$440.56	\$154.74	\$595.30			
69	TOTAL - OBJECTIVE 6		14.13	\$406.87	\$142.90	\$549.77			
70	TOTAL - OBJECTIVE 7		0	\$0.00	\$0.00	\$0.00			
71	TOTAL - OBJECTIVE 8		355.6	\$10,239.41	\$3,596.38	\$13,835.79			
72			1647.81	\$47,448.26	\$16,665.23	\$64,113.49			
73									
74									

# Calculating Staffing Cost

- Detailed information on how staffing costs were assigned to each objective can be found on the attached CD.
- The results of this analysis can be found in Section 3.0 – AQMS Workload Analysis (Short Term).





## Calculating Program Support Costs

- An estimation of 2008 program support costs was also necessary to determine total AQMS costs.
- Program support costs include building rent, office supplies, fleet vehicle rentals, computers, etc.
- A detailed analysis of program support costs for FY2005 and FY2006 was presented in *Title V Fee Discussions Background Information*, December 2006.

# Calculating Program Support Costs

- Baseline 2008 program support costs were calculated by taking the average 2005 and 2006 costs and increasing the average by the CPI.
- Since this result is reflective of an average staff of 69.5 FTE's, \$42,300 was added to the total to reflect the additional overhead costs associated with 14.1 additional FTE's

(Note: Overhead costs are estimated at \$3,000 per FTE)





## Calculating Program Support Costs

- A Division Director's Office cost and the cost of the Small Business Technical Assistance Program also had to be included
- A Division Director's Office cost of \$400,000 was used. Since this amount varies, the maximum withdrawal taken over the past six years was used. This cost covers a portion of the budget office and the criminal enforcement unit (Environmental Protection Officers), contractual services including legal fees, and other program support costs.

# Calculating Program Support Costs

- A Small Business Technical Assistance Program cost of \$85,241.47 was used. This cost covers the cost of the Small Business Ombudsman and 30% of an Administrative Specialist. This cost is the actual FY2008 cost of the program. Please note that additional funding support for this program including travel, supplies, and other support costs is included in the overall AQMS program support costs.



## Calculating Program Support Costs

- The results of this analysis can be found in Section 3.6 – Program Support Costs.





# Workload Analysis Results

- Total Employee Cost
  - \$6,051,999.15
- Program Support Cost
  - \$1,444,223.57
- Director's Office Support
  - \$400,000.00
- Small Business Support
  - \$85,241.47
- **Total AQMS Costs**
  - **\$7,981,464.19**



# Funding Analysis

Revenue Category	Revenue
Reg. 2 Fees	\$121,850.00
103 Grant	\$256,835.00
General Fund Revenue	\$1,260,700.00
105 Grant Revenue	\$1,143,115.00
Other Federal Revenue	\$579,063.00
Title V	\$2,922,000.00
<b>Total Revenue:</b>	<b>\$6,283,563.00</b>

# Required Revenue Increase

- Required revenue increase in dollars
  - \$1,697,901.72
- Required revenue increase in percentage
  - 27.02%
- This represents a total increase across AQMS
- The next step is to determine what portion of the revenue should come from Title V

