

State of Delaware

Department of Natural
Resources and
Environmental Control

Division of Air Quality



*Annual
Title V Fee
Committee
Status Report*

Calendar
Year
2011

Published August 2012

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

Title V Fee Committee Status Report
August 28, 2012

Table of Contents

Section	Page
Introduction.....	1
Title V Fee Committee.....	2
Overall Program Costs.....	4
Fees Collected.....	4
Current Staffing Levels.....	6
Program Accomplishments.....	7
Title V Permitting Activities.....	7
Title V Compliance Activities.....	7
Title V Enforcement Activities.....	8
Title V Planning Activities.....	8
Title V Emission Inventory Activities.....	10
Title V Air Monitoring Activities.....	11
Title V Small Business Ombudsman Activities.....	11
Other Special Accomplishments.....	13
Source Hours for the Previous Calendar Year.....	16
Appendix A.....	17

Title V Fee Committee Status Report

August 28, 2012

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. Code 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.

Although the universe of Major and Synthetic Minor sources has not changed as a result of the new requirements that regulate CO₂ as a Title V pollutant, we have issued and are in the process of issuing permits that address Greenhouse Gas Best Available Control Technology (Greenhouse Gas BACT). Considerable effort has been spent to train permit writers on how to address these new requirements.

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 (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 accomplishments.

Title V Fee Committee Status Report August 28, 2012

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 over those activities and the fees assessed.

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. Code 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 has been operating for several years, and 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 and other Title V requirements are being met while the payment burden is distributed fairly across the Major Source and Synthetic Minor facilities. In order to do this, the Division of Air Quality estimated the cost of the Title V Program through a detailed Workload Analysis. The results of the Workload Analysis then set the basis for the total Title V revenue that needs to be collected annually for the next three years. 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. See <http://www.dnrec.delaware.gov/whs/awm/Pages/Title%20V%20Committee%20Information.aspx> for the Workload Analysis that was used during the 2011 round of fee negotiations.

The Title V Fee Schedule for Calendar Year 2011, which was supported by the Title V Fee Committee, was presented to the Delaware General Assembly through House Bill 418. It was passed by the House on June 5, 2008, was passed by the Senate on June 19, 2008, and was signed by the Governor on July 3, 2008. This Title V Fee Schedule applies to Calendar Years 2009, 2010, and 2011.

The current Title V Fee Schedule, which was supported by the Title V Fee Committee, was presented to the Delaware General Assembly through House Bill 186. It was passed by the House on June 22, 2011, was passed by the Senate on June 30, 2011, and was signed by the Governor on July 13, 2011. This Title V Fee Schedule applies to Calendar Years 2012, 2013, and 2014. It can

¹ 7 Del. Code Chapter 60 Subchapter VII § 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."

Title V Fee Committee Status Report
August 28, 2012

be found in 7 Del. Code Chapter 60, Subchapter VIII and is available at:
<http://delcode.delaware.gov/title7/c060/sc08/index.shtml>.

The Title V Fee Committee was active in Calendar Year 2011 as we worked to develop a new fee schedule for Calendar Years 2012, 2013, and 2014. The Committee met as a whole on the following dates:

- January 20, 2011 – This meeting reviewed the updated Workload Analysis and answered questions presented by the committee.
- March 9, 2011 – This meeting reviewed and discussed questions presented by the committee and worked to meet an agreement on the proposed Title V Fee Schedule for Calendar Years 2012-2014.

The materials for these meetings are available on the Title V Fee Committee website at:
<http://www.dnrec.delaware.gov/whs/awm/Pages/Title%20V%20Committee%20Information.aspx>.

Title V Fees are billed annually in December for the next calendar year. Title V bills for Calendar Year 2011 were mailed in December 2010. 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 1st. 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 will be taken.

Please note that the new Title V Fee Structure for Calendar Years 2012-2014 contains a clause for late payments. Section 6097(h) states “Any delinquent subject source shall be subject to a 2% compounding monthly interest rate for each month overdue. Subject sources delinquent for more than one year may be subject to permit cancellation.” These late fees will first be charged in 2013 for sources that were delinquent on their 2012 bill. This late fee clause was added during the 2011 Title V Fee Schedule negotiations to address the rising number of facilities who have been delinquent on their payments.

**Title V Fee Committee Status Report
August 28, 2012**

Overall Program Costs

See Table 1 for a summary breakdown of Calendar Year 2011 Title V Costs.

Table 1: 2011 Title V Costs

Salary	\$2,391,920
Travel	\$6,613
Contractual ²	\$527,897
Capital Outlay (New Phone System)	\$20,307
Supplies	\$6,122
Additional Support Services ³	\$235,610
Small Business Ombudsman Program ⁴	\$89,390
Total	\$3,277,859

Fees Collected

Title V fees are billed on a calendar year basis (January 1 through December 31), but are spent on a state fiscal year basis (July 1 through June 30). In addition, the calendar year revenue includes interest gained on the Title V account and quarterly payments made by some facilities that were billed in the previous calendar year but not paid until the current calendar year. This makes comparing revenue and expenditures difficult.

In 2011, 82 active Synthetic Minor and 59 Title V facilities were billed. A total of \$4,094,235 was billed, however, as of December 31, 2011, \$3,942,451 was collected. The difference of \$151,784 was the result of 9 non-payments and the quarterly billing collections. Some of these unpaid bills carry over from Calendar Year 2010. Any back fees that are collected in the future will be counted towards the 2012 revenue. Please note that the total 2011 revenue is greater than the amount collected due to interest gained on the account.

The total Calendar Year 2011 Title V revenue was \$3,967,321. See Figure 1 for a history of Title V billing and revenue since 1997.

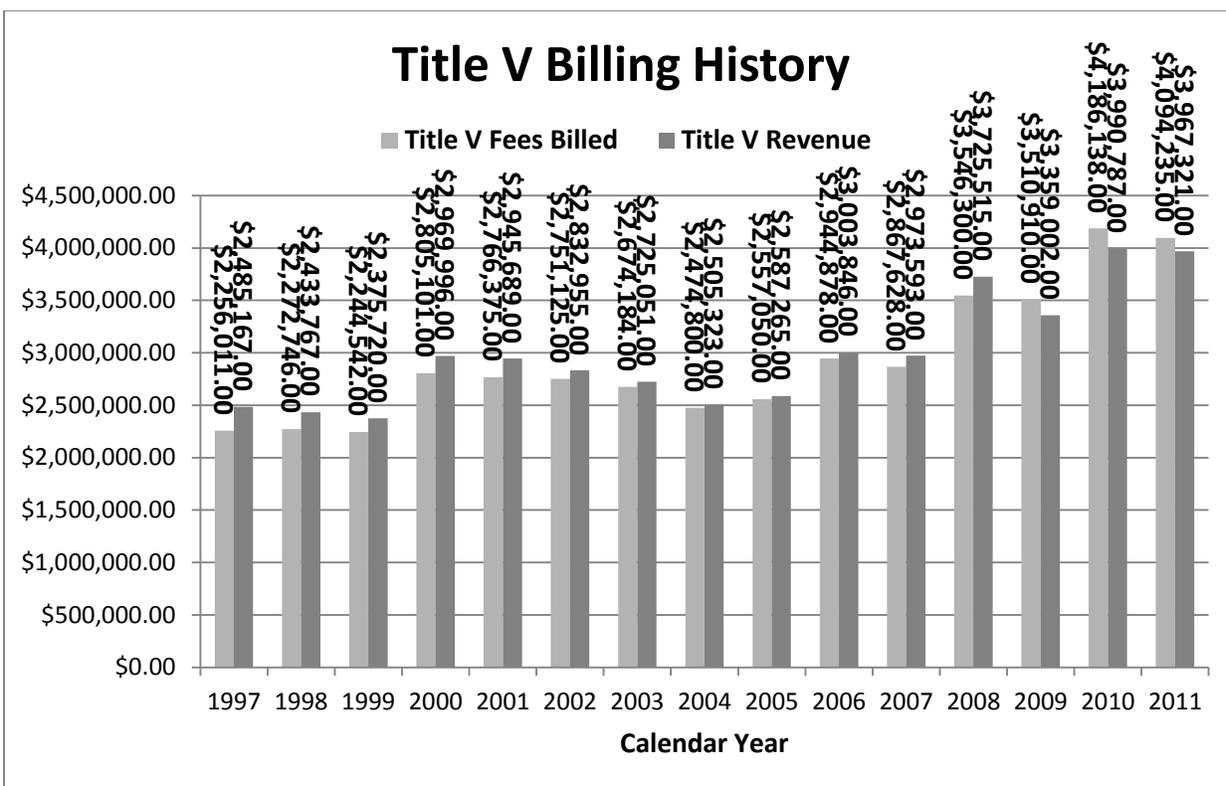
² Items covered under the “Contractual” category include: Legal Assistance, support to the Office of Information Technology, Fleet charges (vehicle rental), building rent, utilities, vendor payments, temp services, and the upkeep of some air monitoring equipment.

³ Items covered under “Additional Support Services” include the Environmental Crimes Unit, accounting services, and support for the Office of Environmental Protection.

⁴ Items covered under the “Small Business Ombudsman Program” include the salary and expenses of 1.3 FTEs.

**Title V Fee Committee Status Report
August 28, 2012**

Figure 1: Title V Billing and Revenue History



Due to the transition to the new First State Financials (FSF) accounting system, the DAQ has developed a new method of estimating the carryover balance. This method involves tracking the total revenue for each year from the beginning of the Title V program, minus the Title V expenses for each year to predict the Calendar Year 2012 carryover balance. See Table 2 for this prediction showing Calendar Years 2008 forward.

Table 2: Title V Carryover Balance Projection

	2008	2009	2010	2011	2012 Prediction
Total Revenue	\$3,725,515.00	\$3,359,002.00	\$3,990,787.00	\$3,967,321.00	\$3,751,698.00
Expenses	\$2,852,847.00	\$3,063,713.00	\$2,886,241.00	\$2,952,858.00	\$3,103,705.26
Additional Support Costs	\$385,278.00	\$350,000.00	\$375,000.00	\$325,000.00	\$350,000.00
Total Expenses	\$3,238,125.00	\$3,413,713.00	\$3,261,241.00	\$3,277,858.00	\$3,453,705.26
Δ Revenue - Expenses	\$487,390.00	-\$54,711.00	\$729,546.00	\$689,463.00	\$297,992.74
Carryover Balance	\$2,443,093.00	\$2,388,382.00	\$3,117,928.00	\$3,807,391.00	\$4,105,383.74

Please note that the 2012 expenses prediction includes the employee costs for 1.4 newly filled Title V positions and a 2% across the board increase in the salary and benefit costs for previously filled Title V positions. An Additional Support Cost of \$350,000 was used in the prediction as it is the average over the past three years.

**Title V Fee Committee Status Report
August 28, 2012**

Current Staffing Levels

The Division of Air Quality's end of calendar year 2011 staffing level was 88% and 8 positions were vacant. Departmental personnel management actions reassigned one position to another Division reducing the number of authorized positions to 68. See Table 3 for a breakdown of staffing levels in each branch within the Division.

Table 3: Division of Air Quality Staffing Levels

Branch	Authorized	Occupied	Staffing Level
Director's Staff	8.5	8.5	100%
Air Surveillance	13.0	11.0	85%
Engineering & Compliance	23.5	21.5	91%
Planning	23.0	19.0	83%
Total	68.0	60.0	88%
Temporary Positions	2.0	2.0	100%
Seasonal Positions	1.0	1.0	100%

During 2011 four employees separated or retired from the Division and one additional employee were hired. On December 25, 2011 the recently hired employee (see Table 4) was reassigned to another Division. See Table 4 for a list of hiring actions taken in calendar year 2011.

Table 4: Calendar Year 2011 Hiring Actions

Date	Name	Source	Position	Branch	Funding
5/1/2011	Smith, Nicole	External	Env. Comp. Spec.	Planning	I&M

Please note that in 2008 the DAQ (then the Air Quality Management Section) was authorized to have 76 full time positions. The DAQ is now authorized 68 positions as the result of the October 9, 2009 Department of Natural Resources and Environmental Control's State of Delaware imposed overall personnel cap. See Table 5 for a summary of how position allocations have changed.

Table 5: Branch Position Allocations Comparison

Branch	2008 Authorized	2011 Authorized	% Changed	2008 Assigned	2011 Assigned	% Changed
Director's Staff	10	8.5	-15%	10	8.5	-15%
Air Surveillance	14	13	-7%	12	11	-8%
Engineering & Compliance	30	23.5	-22%	25	21.5	-14%
Planning	22	23	4.5%	20	19	5%
Total	76	68	-10.5%	67	60	-10.4%

As Table 5 indicates, the Engineering & Compliance Branch has lost the largest number of positions, or 22% of its 2008 allocation.

Title V Fee Committee Status Report August 28, 2012

Program Accomplishments

Title V Permitting Activities

The Division of Air Quality is responsible for all permitting activities at Title V and Synthetic Minor facilities. In calendar year 2011, the following permitting activities were accomplished:

- 7 Title V Permit Renewals were issued;
- 8 Title V Permit Amendments were issued;
- 1 Initial Title V Permit was issued;
- 8 Synthetic Minor Construction Permits were issued; and
- 11 Synthetic Minor Operating Permits 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. In calendar year 2011, the Division of Air Quality issued Title V Permit Renewals within 395 days of application receipt on average. The shortest amount of time to issue a Title V Permit Renewal was 158 days, while the longest amount of time was 827 days. In calendar year 2011, one renewal was issued outside of the 547 day timeframe. This was the result of incorporating new conditions limiting emissions of mercury into the permit based upon stack tests of the source. This permit was also subject to a combined Air Quality and Waste and Hazardous Substances public hearing that added additional time onto permit issuance.

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 3.3 to 4.7 months or 102 to 145 days. A permit issuance range was chosen for Synthetic Minor permits because of the varying complexity of these permits. In calendar year 2011, Synthetic Minor permits were issued within 268 days from receipt and 192 days from the Technically Complete determination on average. This extremely high average was the result of two synthetic minor permits that were issued well outside of the timeframe due to competing permitting priorities. All of the rest of the permits were issued within the required timeframe. Excluding these two outliers, Synthetic Minor permits were issued within 126 days of receipt and 66 days from the Technically Complete determination on average.

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 continue and possibly increase.

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 relative accuracy test audits (RATAs), and report reviews. In calendar year 2011, the following compliance activities were undertaken:

Title V Fee Committee Status Report August 28, 2012

- 45 on-site compliance evaluations were conducted at Title V facilities;
- 130 stack tests and RATAs were conducted at Title V facilities;
- 190 report reviews were conducted for Title V facilities;
- 33 on-site compliance evaluations were conducted at Synthetic Minor facilities;
- 48 stack tests were conducted at Synthetic Minor facilities; and
- 15 report reviews were conducted for Synthetic Minor facilities.

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 seeks and generally obtains substantial 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.state.de.us/dnrec2000/Admin/Enforcement/Guide/CandEGuide.htm>. In calendar year 2011, the following enforcement activities were completed (please note that this does not include pending enforcement activities):

- 5 Notices of Violation were issued to Title V facilities;
- 2 Administrative Order was issued to a Title V facility;
- 1 Stipulated Penalty Demand Letters were issued to Title V facilities;
- 0 Consent Decrees were issued to Title V facilities;
- 2 Notices of Violation were issued to Synthetic Minor facilities; and
- 2 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, including the extensive ozone, fine particulate matter (PM_{2.5}) and visibility SIPs, to ensure progress in attaining and maintaining ambient air quality standards and meeting visibility goals;
- 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 2011:

Title V Fee Committee Status Report
August 28, 2012

- State Implementation Plan (SIP) Activities:
 - Submitted a SIP revision that addressed the infrastructure requirements of the Clean Air Act (CAA) relative to the new Lead National Ambient Air Quality Standard (NAAQS);
 - Analyzed and documented to the EPA the fulfillment of Delaware's CAA infrastructure obligations for the 0.075 ppm 8-hour ozone NAAQS;
 - Continued to work with EPA, federal land managers, and other states in planning and analysis for the upcoming Regional Haze Program mid-course review SIP; and analysis for the upcoming Regional Haze Program mid-course review SIP;
 - Completed substantial work on a request for designation to attainment for the 15 $\mu\text{g}/\text{m}^3$ annual and 35 $\mu\text{g}/\text{m}^3$ 24-hour $\text{PM}_{2.5}$ NAAQSs. Final SIP submittals are planned for late 2012.
 - Began work on the infrastructure requirements for the SO_2 NAAQS, relative to CAA 110(a)(2)(D)(i)(I). Final submittal to include all elements of 110(a)(2)(A-M) and planned for completion by June 2013;
 - Began work on the maintenance plan SIP for the SO_2 NAAQS. Final submittal planned for 2013;
 - Finalized a SIP revision that supplements the $\text{PM}_{2.5}$ CAA Section 110 "Infrastructure" SIP by adding a technical analysis that explains and demonstrates in additional detail how Delaware has satisfied the requirements of CAA 110(a)(2)(D)(i)(I);
 - Finalized a SIP revision that demonstrated that amendments to 7 **DE Admin. Code** 1142, Source Specific Control Requirements, would not interfere with any applicable requirement of the Clean Air Act; and
 - Substantially completed a SIP that revised the mobile budgets contained in the $\text{PM}_{2.5}$ attainment demonstration SIP to reflect a new mobile emissions model, and to demonstrate that new budgets were consistent with the attainment of the $\text{PM}_{2.5}$ NAAQS.
- Regulatory Development Activities:
 - Substantially completed an amendment to 7 **DE Admin. Code** 1125, Requirements for Preconstruction Review, to provide for new source review permitting of major stationary sources of $\text{PM}_{2.5}$ and $\text{PM}_{2.5}$ precursors;
 - Finalized revision to Section 8.0 of 7 **DE Admin. Code** 1138, Emission Standards for Hazardous Air Pollutants for Source Categories by adopting the federal residual risk requirements applicable to halogenated solvent cleaning operations;
 - Began to process to amend 7 **DE Admin. Code** 1138, Emission Standards for Hazardous Air Pollutants for Source Categories to adopt the federal requirements for animal feed manufacturing facilities;
 - Substantially completed an amendment to 7 **DE Admin. Code** 1144, Stationary Generator Emissions, to revise the requirements that apply to new emergency only

Title V Fee Committee Status Report

August 28, 2012

- generators, and to provide for necessary record keeping and reporting of distributed generators;
- Finalized a revision to 7 **DE Admin. Code** 1124, Control of Volatile Organic Compound Emissions, by revising Section 47.0 Offset Lithographic Printing, to be consistent with EPA's Lithographic and Letterpress Printing Control Techniques Guidelines (CTG);
- Finalized an amendment to 7 **DE Admin. Code** 1142, Source Specific Control Requirements, by revising Section 2.0, Large Boilers and Process Heaters at Petroleum Refineries, to provide for a NO_x emissions limit for the fluid catalytic cracking unit CO boiler (Unit 23-H-3) and for, as an option, compliance with a facility-wide NO_x cap as an alternative to unit specific NO_x emission limits; and
- Submitted a delegation request packages to EPA for four area source air toxics standards adopted in 7 **DE Admin. Code** 1138, Emission Standards for Hazardous Air Pollutants for Source Categories in 2010.
- Other Title V Related Activities:
 - Finalized recommendations and analysis supporting Delaware's attainment status, and non-attainment boundaries for the 0.075 ppm 8-hour ozone NAAQS;
 - Continued to work with EPA and Ozone Transport Commission (OTC) states to address and mitigate the impact of upwind emissions on Delaware's ozone air quality problems;
 - Analyzed and submitted comments to EPA following the proposal of the "Utility MACT";
 - Finalized and actively implemented Delaware's 2011 Air Toxics Strategic Plan (ATSP), which covers the period 2011 through 2015 and finalized the 2012-2016 Air Toxics Strategic Plan;
 - Continued work on development of the 2011 periodic emissions inventory. The inventory is planned for completion by the end of 2012; and
 - Continued to work with the Mid-Atlantic Regional Air Management Association (MARAMA) to develop regional and Delaware specific 2017 and 2020 projection inventories, which will be used for ozone modeling and other planning analysis. Only electric generating unit (EGU) and on-road mobile projections remain, but these categories are expected to be completed and quality assured in 2013.

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 2011:

Title V Fee Committee Status Report August 28, 2012

- 2010 Inventory – Collected point source data through the annual reporting cycle that takes place in the February through April timeframe;
- 2010 Inventory – Point source data for large sources submitted to EPA’s EIS by the December 31 deadline;
- 2011 Inventory – Began planning for the 2011 point source reporting cycle; and
- Continued participation with a consortium of states that used i-STEPS to find a replacement for i-STEPS. The selected vendor was awarded the contract in late 2009. Working with the vendor, a concept design was developed and an alpha version was ready for in-house testing at the end of 2010. Two user acceptance tests were completed in 2011, with one remaining test set for January 2012. The new system is expected to be used for the 2011 reporting cycle in the February-April 2012 time period.

Title V Air Monitoring Activities

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

- Conducting engineering reviews of the plans and methods used for stack testing;
- Reviewing the plans for the installation of continuous emission monitors (CEMS) and subsequent relative accuracy test audits (RATAs);
- Measuring ambient concentrations of selected air pollutants and selected meteorological parameters; and
- Conducting source emission evaluations with the portable analyzer.

The Air Monitoring activities related to source testing are described in the Title V Compliance Activities section above. The ambient air monitoring program receives funding from several sources to accomplish its monitoring objectives. The Title V program supports approximately 30% of the monitoring activities in the program. In Calendar Year 2011, the Air Monitoring Branch accomplished the following Title V related activities:

- Measured the ambient (outdoor) concentrations of the criteria air pollutants along with selected weather parameters. The monitoring network consists of 10, fixed-site monitoring locations;
- 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; and
- Routinely monitored selected hazardous air pollutants (air toxics) including metals, volatile organic compounds, and carbonyls;

Title V Small Business Ombudsman Activities

The Small Business Assistance Program (SBAP) within the Department of Natural Resources and Environmental Control (DNREC) 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

Title V Fee Committee Status Report August 28, 2012

SBAP is a non-regulatory program. The Ombudsman is part of the SBAP which was created through the Clean Air Act Amendments of 1990. The SBAP consists of 1.3 staff members. This includes the Ombudsman who manages the SBAP and an administrative assistant who is shared amongst several programs within DNREC.

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.

The SBAP also serves on the following committees:

- Clean Marina Committee;
- Division Program Awareness Training Committee;
- EPA Area Source Workgroup;
- Spearheading the Permitting Efficiency Workgroup;
- Weekly Air Quality Management Administrator's Office Meetings;
- The Office of the Secretary Recognition Committee; and
- Title V Fee Committee (as needed).

The SBAP spent a significant amount of time during 2011 focusing on compliance assistance to small businesses, particularly auto body shops, specifically related to new Hazardous Air Pollutant (HAP) and Volatile Organic Compound (VOC) regulations that have approaching compliance deadlines.

The Small Business Ombudsman (SBO) has been working as a liaison with the Delaware Economic Development Office (DEDO) providing environmental permitting/regulatory information for businesses that are considering expansion or start-up in Delaware.

The SBO also attends meetings within the business community to promote the SBAP such as the Delaware State Chamber Environmental Committee meeting, DNREC's Brownfield's Advisory Committee meeting, trade association meetings, and others as requested.

Title V Fee Committee Status Report
August 28, 2012

Other Special Accomplishments

In addition to the standard activities described above, the Division of Air Quality 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 2011, the Division of Air Quality participated in the following special activities:

- Participated in DAQ management and administration activities including:
 - Continued workforce and succession planning activities to address the long-term management of our workforce demographics (retirement eligible population) and continuing budget cuts;
 - Expanded safety training programs to include CPR/AED/First Aid and Drivers Safety Training; and
 - After a successful Telecommuting Pilot Program implemented to create efficiencies in facilities, energy, operating costs, and vehicle emissions, committed additional resources to improve and expand telecommuting as an alternate work method across the Division.
- Participated in outreach activities including:
 - Worked with the Delaware Envirothon Committee supporting high school level environmental education, integrated Air Quality as a key topic/study area for the 2011 Delaware Envirothon Competition. The Division of Air Quality is a Gold Sponsor for the Envirothon program supporting the Delaware and Canon Envirothon International Competition;
 - Educational programs and public outreaches addressing conserving energy;
 - Educational programs or public outreaches addressing school-related anti-idling requirements;
 - Public outreach addressing “Community Air Toxics” study;
 - Educational information and public outreach on open-burning restrictions;
 - Ozone Action awareness outreach;
 - Asthma awareness outreach; and
 - Provided the public and the regulated community with pertinent and timely web-based information, including compliance assistance tools, during the amendment and adoption of new standards under 7 **DE Admin. Code** 1138, Emission Standards for Hazardous Air Pollutants for Source Categories;
- Participated in Cancer Consortia activities;
- Participated in Greenhouse Gas Related activities including:
 - Completing four successful auctions of RGGI allowances;
 - Developing compliance materials for reporting the First Compliance Period (2009-2011) emissions/allowances;
 - Began the planning process for the 2012 Program Review;
 - Secretary O’Mara named the RGGI Executive Committee Chair for 2012-2014;
 - Continued to participate in the eleven state and District of Columbia Transportation Climate Initiative;
 - Continued to participate in the NA2050 initiative to discuss greenhouse gas emission reductions in North America;

Title V Fee Committee Status Report
August 28, 2012

- Continued to monitor progress towards the development of the eleven state Low Carbon Fuel Standard – renamed the Clean Fuel Standard; and
 - Continued development of the 2008 Greenhouse Gas Inventory.
- 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;
- Provided advanced modeling support including:
 - Provided advanced modeling support to the Engineering & Compliance Branch when additional modeling was needed to issue permits;
 - Reviewed the modeling protocol, modeling outputs and results for the Evraz Claymont Steel total suspended particulates modeling;
 - Identified SO₂ hotspots resulting from point sources as needed for the new 1-hr SO₂ NAAQS;
 - Provided necessary modeling info of MiniVol Study to SIERRA Club as part of a FOIA request;
 - Provided support to SIRB in their review of the modeling protocol needed for remedial investigation work plan for Burton Island Ash Landfill; and
 - Conducted Hg deposition modeling analysis for Delaware's watersheds.
- Provided air toxics related training recommendations to NACAA and MARAMA for inclusion in the National Training Strategy and the new Learning Management System;
- Participated in Mobile Source Activities including:
 - Continued 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 including:
 - Completed Delaware's annual vehicle Inspection and Maintenance program analysis and report;
 - Continued efforts to propose changes to the Low Enhanced Inspection & Maintenance Program, 7 **DE Admin. Code** 1131 to incorporate Senate Bill 215 requirements; and
 - Developed proposed changes to the State Implementation Plan for implementation of the Low Enhanced Inspection & Maintenance Program which was last updated in 2000.
 - Developed mobile budgets for PM_{2.5};
 - Conducted a Phase II Remote Sensing Study;
 - Participated on the Clean Air Council Delaware Diesel Difference which included the Trinity Trucking Refrigeration Project;
 - Conducted School Bus Anti-Idling Surveys;
 - Completed construction and retrofit activities related to an American Recovery and Reinvestment Act grant and the Diesel Emissions Reduction Act (DERA) grant for:
 - Additional school bus diesel retrofits;
 - Smyrna Rest Area truck stop electrification; and
 - Fort Delaware alternative power.

Title V Fee Committee Status Report
August 28, 2012

- Port Study to assess the baseline impacts and impacts after the diesel retrofits;
- 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;
- Supported the Manufacturing Efficiency Grants Program;
- Coordinated with the Energy and Climate Division on energy policy issues; and
- Upgraded the Air Monitoring Network.

**Title V Fee Committee Status Report
August 28, 2012**

Source Hours for the Previous Calendar Year

The Title V fee schedule is based upon two components, the Base Fee and the User Fee. The Base Fee is calculated from the total hours spent working on the facility for the previous five years. The User Fee is calculated from the facility's most recent baseline year emission inventory report. The Title V Fee Schedule for Calendar Years 2009 through 2011 is provided in Table 6 below:

Table 6: Calendar Year 2009 through 2011 Title V Fee Schedule

Fee Type	Category	Category Description	2009 Fee	2010 and 2011 Fee
Base Fee	A	> 6,000 Hours	\$207,842	\$243,000
Base Fee	B	5,001 – 6,000 Hours	\$81,255	\$95,000
Base Fee	C	4,001 – 5,000 Hours	\$70,136	\$82,000
Base Fee	D	3,001 – 4,000 Hours	\$60,728	\$71,000
Base Fee	E	2,001 – 3,000 Hours	\$42,766	\$50,000
Base Fee	F	1,501 – 2,000 Hours	\$31,647	\$37,000
Base Fee	G	1,001 – 1,500 Hours	\$21,383	\$25,000
Base Fee	H	667 – 1,000 Hours	\$13,685	\$16,000
Base Fee	I	334 – 666 Hours	\$6,843	\$8,000
Base Fee	J	0 – 333 Hours	\$4,277	\$5,000
Base Fee	K	New Sources that Have Applied for a Permit by December 31, 2008	\$5,132	\$6,000
User Fee	1	> 6,500 Tons	\$149,681	\$175,000
User Fee	2	2,001 – 6,500 Tons	\$106,915	\$125,000
User Fee	3	1,001 – 2,000 Tons	\$42,766	\$50,000
User Fee	4	501 – 1,000 Tons	\$25,660	\$30,000
User Fee	5	201 – 500 Tons	\$11,974	\$14,000
User Fee	6	101 – 200 Tons	\$5,132	\$6,000
User Fee	7	51 – 100 Tons	\$3,849	\$4,500
User Fee	8	26 – 50 Tons	\$2,566	\$3,000
User Fee	9	0 – 25 Tons	\$1,711	\$2,000
User Fee	10	New Sources that Have Applied for a Permit by December 31, 2008	\$2,566	\$3,000

The Base Fee for each facility is obtained by creating reports from the Division of Air Quality timekeeping system. For a detailed description of how a facility's Base Fee was calculated, please contact Amy Mann at (302) 323-4542.

In order to help facilities track their Title V Fee Bill, the hours spent working on each Title V and Synthetic Minor facility are presented in Appendix A for Calendar Years 2007 through 2011. Each Title V and Synthetic Minor facility's 2008 Base Year Emission Inventory is also included.

**Title V Fee Committee Status Report
August 28, 2012**

Appendix A

Company Name	Classification	2011 Hours	2010 Hours	2009 Hours	2008 Hours	2007 Hours	5 Year Total	2008 NO ₂ Emissions (tons/year)	2008 PM ₁₀ Emissions (tons/year)	2008 SO ₂ Emissions (tons/year)	2008 VOC Emissions (tons/year)	2008 Total Emissions (tons/year)
3D Fabrications	SM	2	17.5	8.5	15.0	NO DATA	43.0	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
A.I. DuPont Hospital for Children	TV	444	306.5	401.3	129.0	357.0	1637.8	12.93	1.56	25.18	0.61	40.28
Aero Technologies LLC	TV	51.5	110	126.5	147.0	179.0	614.0	0.59	0.03	0.00	4.68	5.30
Air Liquide Industrial US LP	TV	50.25	15.5	11.0	71.0	35.0	182.8	0.00	0.00	0.00	0.73	0.73
Allen Family Foods, Inc.	SM	67.25	17.5	3.5	27.0	17.0	132.3	14.29	2.48	24.11	0.09	40.97
Ameresco Delaware Energy - Central	TV	15	NO DATA	NO DATA	NO DATA	NO DATA	15.0	21.40	5.40	4.65	8.20	39.65
Ameresco Delaware Energy - Southern	TV	45	NO DATA	NO DATA	NO DATA	NO DATA	45.0	30.00	7.70	66.00	11.20	114.90
American Air Liquide - Glasgow	SM	123.5	9	11.0	71.0	35.0	249.5	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
Amtrak Wilmington	TV	36	134	95.0	148.0	166.0	579.0	4.06	0.03	0.02	2.35	6.47
Arlon, Inc.	SM	41.25	178	48.5	164.0	311.0	742.8	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
Astra Zeneca - Newark	SM	16	23.75	34.5	79.0	30.0	183.3	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
AstraZeneca Pharmaceuticals, LLC	TV	119	81	205.0	187.0	131.0	723.0	7.04	0.15	0.15	1.77	9.10
Barclays Bank (Pettinaro Construction)	SM	103	57.5	NEW	NEW	NEW	160.5	NEW	NEW	NEW	NEW	NEW
BASF Corporation	TV	312.25	346.75	328.0	495.0	654.0	2136.0	9.81	2.18	0.25	19.01	31.25
Bayhealth - Milford Memorial Hospital	SM	30	76.25	74.8	11.0	22.0	214.0	5.89	0.75	6.08	0.06	12.79
Bayhealth Medical Center - Kent General Hospital	TV	83.75	196.75	75.5	141.0	125.0	622.0	4.30	0.03	0.67	0.23	5.23
BPG Office Partners - Crozier	SM	5.5	11.5	13.0	28.0	17.0	75.0	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
Bracebridge Corp (Bracebridge)	SM	35.75	8	20.5	1.0	50.0	115.3	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
Bracebridge Corp (Christiana)	SM	44	17.5	11.5	1.0	15.0	89.0	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
Bracebridge Corp (Deerfield)	SM	44.5	11.5	17.5	2.0	57.0	132.5	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
Calpine - Christiana	TV	37	62	117.5	94.0	171.0	481.5	1.50	0.15	0.34	0.00	1.99
Calpine - Delaware City	TV	7	11.5	44.5	54.0	106.0	223.0	1.00	0.19	0.30	0.00	1.49
Calpine - Edge Moor	TV	244.25	1008.5	790.3	781.0	94.0	2918.0	1,980.01	449.94	7,110.00	30.89	9570.83
Calpine - Hay Road	TV	292.5	590.5	634.5	633.0	307.0	2457.5	202.20	36.18	9.80	11.37	259.55

**Title V Fee Committee Status Report
August 28, 2012**

Company Name	Classification	2011 Hours	2010 Hours	2009 Hours	2008 Hours	2007 Hours	5 Year Total	2008 NO ₂ Emissions (tons/year)	2008 PM ₁₀ Emissions (tons/year)	2008 SO ₂ Emissions (tons/year)	2008 VOC Emissions (tons/year)	2008 Total Emissions (tons/year)
Calpine - West	TV	11	29	42.8	37.0	101.0	220.8	0.60	0.53	1.22	0.00	2.36
Camdel Metals Corporation	TV	73	44.25	110.3	154.0	38.0	419.5	0.00	0.00	0.00	3.10	3.10
Christiana Care - Christiana Hospital	TV	187.75	14	398.8	71.0	146.0	817.5	16.30	0.53	4.38	0.85	22.05
Christiana Care - Wilmington Hospital	SM	NO DATA	30.75	3.0	11.0	17.0	61.8	6.76	0.12	0.12	0.37	7.37
Christiana Materials, Inc.	SM	55.5	106	61.5	68.0	34.0	325.0	3.35	4.50	0.50	1.51	9.86
City of Dover - McKee Run	TV	75.5	94.25	414.0	262.0	224.0	1069.8	32.78	2.49	31.80	0.28	67.36
City of Dover - VanSant	TV	42.25	47.5	69.0	139.0	44.0	341.8	1.30	0.23	0.61	0.02	2.16
Clean Earth of New Castle	TV	151.5	310.5	12.0	146.0	49.0	669.0	10.67	7.68	24.43	1.50	44.28
Coastal Coatings	SM	1.5	22	19.0	20.0	53.0	115.5	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
Coker Concrete	SM	9.5	1	7.0	1.0	25.0	43.5	0.17	0.03	0.03	0.02	0.25
Color-Box LLC	SM	2.5	21	55.5	134.0	38.5	251.5	0.74	0.04	0.00	16.12	16.91
Computer Sciences Corp	SM	18.5	0.5	30.0	16.0	7.0	72.0	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
Conectiv Thermal Systems	SM	35	78.5	30.8	7.0	70.0	221.3	0	0.0	0.0	0.0	0.00
Contractors Materials LLC	SM	58	44	38.8	NEW	NEW	140.8	2.01	3.52	0.26	2.48	8.27
Corrado Construction	SM	5	35.25	40.5	113.0	87.0	280.8	1.12	0.08	0.07	0.06	1.33
Croda Inc.	TV	519.5	303.25	416.0	318.0	254.0	1810.8	48.51	0.98	6.79	10.10	66.37
Dana Railcar Services, Inc.	SM	NO DATA	6	8.0	27.0	92.0	133.0	0	0	0	0	0
Dassault Falcon Jet	TV	117.25	107.25	215.0	324.0	152.0	915.5	1.25	0.04	0.01	15.86	17.16
David A Bramble Inc./Seaford Asphalt Plt	SM	2	59	122.0	171.3	0.0	354.3	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
David A Bramble, Gumboro	SM	1	1	54.3	179.0	19.0	254.3	2.26	0.85	1.66	0.15	4.92
Delaware City Refining Company	TV	2479.75	3182	4835.3	5741.0	4968.0	21206.0	2,524.68	446.46	2,547.57	433.70	5,952.4
Delaware City Refining Company - Marketing Terminal	TV	125	107.75	22.0	77.0	52.0	383.8	0.19	0.02	0.00	32.76	33.0
Delaware Hospital for the Chronically III	SM	45	82.25	43.8	37.0	74.0	282.0	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
Delaware Park	SM	0.5	84.25	58.3	130.0	41.0	314.0	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA

**Title V Fee Committee Status Report
August 28, 2012**

Company Name	Classification	2011 Hours	2010 Hours	2009 Hours	2008 Hours	2007 Hours	5 Year Total	2008 NO ₂ Emissions (tons/year)	2008 PM ₁₀ Emissions (tons/year)	2008 SO ₂ Emissions (tons/year)	2008 VOC Emissions (tons/year)	2008 Total Emissions (tons/year)
Delaware Recyclable Products, Inc.	SM	13.5	91.75	44.5	250.0	78.0	477.8	3.01	0.93	27.70	1.99	33.63
Delaware Solid Waste Authority, Cherry Island	TV	646.75	360.75	354.0	561.0	778.0	2700.5	1.20	0.70	6.80	24.18	32.88
Delaware Solid Waste Authority, Sandtown	TV	114	291.75	337.8	413.0	568.0	1724.5	3.10	1.30	3.00	10.80	18.20
Delaware Solid Waste Authority, Southern	TV	136.25	206	324.5	768.0	1128.0	2562.8	7.78	1.90	48.40	17.20	75.28
Delaware State University	TV	139.5	68.5	66.0	110.0	247.0	631.0	3.20	0.06	0.53	0.16	3.94
Department of Corrections - Howard R. Young	SM	NO DATA	27.5	47.3	10.0	27.0	111.8	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
Department of Corrections - James T. Vaughn	TV	126.5	102.25	133.8	86.0	409.0	857.5	5.66	0.11	0.11	0.58	6.4
Department of Veterans Affairs Medical Center	TV	156	57.5	NO DATA	192.0	290.0	695.5	3.87	0.09	0.44	0.20	4.6
Diamond Materials LLC	SM	37.5	67.5	45.5	83.0	316.0	549.5	4.75	8.32	0.62	5.85	19.55
Diamond Materials LLC - Roving Crusher	SM	4.5	72.5	75.3	NEW	NEW	152.3	4.26	0.299	0.279	0.226	5.06
Diamond State Port Corporation	TV	192.5	142	6.0	45.0	31.8	417.3	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
Dover Air Force Base	TV	568.25	232.6	428.5	100.0	430.0	1759.4	38.83	2.27	22.28	31.04	94.42
Dover Downs	SM	36	175.25	3.5	162.0	65.0	441.8	1.43	0.02	0.02	0.08	1.56
DuPont Chestnut Run	TV	193.25	206.5	200.0	119.0	190.0	908.8	45.48	11.09	139.66	2.22	198.45
DuPont EdgeMoor	TV	533.5	396.25	676.3	481.0	557.0	2644.0	31.75	25.59	16.88	99.85	174.07
DuPont Experimental Station	TV	586.25	502.25	527.3	497.0	694.0	2806.8	156.29	38.09	437.70	6.43	638.51
DuPont Red Lion	TV	257.5	48.25	231.3	60.0	363.5	960.5	13.42	0.08	46.74	1.11	61.36
DuPont Stine Haskell	TV	78.5	123	205.0	22.0	16.0	444.5	16.18	0.76	8.43	2.52	27.89
DuPont Wilmington Office Building	TV	67	166.5	340.0	271.0	60.0	904.5	18.62	4.54	57.17	0.11	80.43
Eastern Shore Natural Gas, Bridgeville	SM	6.75	16	9.3	9.0	50.0	91.0	2.90	0.02	0.00	0.21	3.13
Eastern Shore Natural Gas, Delaware City	SM	26	53.5	47.8	4.0	19.0	150.3	4.49	0.00	0.00	2.49	6.98
Edgemoor Materials, Inc.	SM	NO DATA	11.5	126.3	8.0	7.0	152.8	2.97	2.57	0.33	3.17	9.04

**Title V Fee Committee Status Report
August 28, 2012**

Company Name	Classification	2011 Hours	2010 Hours	2009 Hours	2008 Hours	2007 Hours	5 Year Total	2008 NO ₂ Emissions (tons/year)	2008 PM ₁₀ Emissions (tons/year)	2008 SO ₂ Emissions (tons/year)	2008 VOC Emissions (tons/year)	2008 Total Emissions (tons/year)
Evraz Claymont Steel	TV	1338.5	1183.75	1482.3	1163.0	1488.0	6655.5	189.74	77.31	42.16	66.89	376.1
First State Investors	SM	NO DATA	14.5	25.3	35.0	NEW	74.8	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
FMC Corporation	TV	97.25	50.5	17.5	315.0	101.0	581.3	29.57	16.75	0.18	1.34	47.8
Formosa Plastics Corporation	TV	195.75	168.75	146.3	542.0	283.0	1335.8	24.61	26.91	0.12	41.97	93.6
FP International, Inc.	TV	165.25	32.75	31.3	89.0	23.0	341.3	0.69	0.00	0.00	16.66	17.4
Garrison Energy Center, LLC (not operational - no billing)	TV	281	262.5	NEW	NEW	NEW	543.5	NEW	NEW	NEW	NEW	NEW
GE Energy Ceramics Composites	SM	14	10	50.5	53.0	47.0	174.5	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
General Motors Corporation (to become Fiskar Automotive)	TV	351.5	0	139.3	293.0	393.0	1176.8	Closed	Closed	Closed	Closed	Closed
Hanesbrand, Inc.	SM	NO DATA	0	32.5	84.0	6.0	122.5	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
Hanover Foods	TV	28.25	36.5	50.8	89.0	148.0	352.5	3.87	0.21	1.80	0.15	6.0
Harris Manufacturing, Inc.	TV	144.25	18.75	90.0	65.0	126.0	444.0	0.00	0.00	0.00	8.92	8.9
Harris Manufacturing, Inc. - Glenwood	SM	81	3.5	15.0	NO DATA	NO DATA	99.5	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
Hercules Inc. Research Center	TV	214.5	263.25	285.5	194.0	181.0	1138.3	5.57	0.76	8.88	1.23	16.4
Hirsh Industries, Inc.	TV	171	231.75	106.5	145.0	63.0	717.3	1.32	0.04	0.01	26.32	27.7
Honeywell International	SM	1	32.5	30.5	152.0	242.0	458.0	0.00	0.00	0.00	2.99	3.0
ICM of Delaware Bay Road	SM	563	170	91.5	45.0	118.0	987.5	7.70	3.76	4.71	3.58	19.7
ICM of Delaware Georgetown	SM	73.75	40.75	166.3	7.0	NO DATA	287.8	2.37	1.96	2.50	1.38	8.2
IKO Production Wilmington, Inc.	SM	64.5	497.25	270.3	114.0	244.0	1190.0	0	0	0	0	0
ILC Dover, LP	SM	14.5	103	70.3	28.0	100.0	315.8	0.00	0.00	0.00	10.61	10.6
Indian River Power LLC	TV	971.5	618.25	1073.5	1292.0	811.0	4766.3	6,579.40	1,606.12	24,643.18	40.08	32,868.8
Ineos Films	SM	57.5	71	0.5	41.0	211.0	381.0	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
International Petroleum Corp	SM	15	102	11.0	1.0	8.0	137.0	0	0	0	0	0
Invista	TV	453.5	572	386.3	763.0	776.0	2950.8	940.87	217.31	3,260.48	26.13	4,444.8
JP Morgan Chase	SM	NO DATA	0	0.5	29.0	21.0	50.5	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA

**Title V Fee Committee Status Report
August 28, 2012**

Company Name	Classification	2011 Hours	2010 Hours	2009 Hours	2008 Hours	2007 Hours	5 Year Total	2008 NO ₂ Emissions (tons/year)	2008 PM ₁₀ Emissions (tons/year)	2008 SO ₂ Emissions (tons/year)	2008 VOC Emissions (tons/year)	2008 Total Emissions (tons/year)
JP Morgan Chase Governor Printz	SM	NO DATA	0	NO DATA	5.0	9.0	14.0	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
JP Morgan Chase Stanton	SM	NO DATA	9.5	NO DATA	7.0	7.0	23.5	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
Justin Tanks, LLC	TV	55.5	23.25	68.7	281.0	39.0	467.4	0.29	0.03	3.43	12.31	16.1
Kraft Foods North America Inc. Dover	SM	99.5	6	76.0	NO DATA	33.0	214.5	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
Kuehne Company	TV	331	453	227.5	108.0	93.0	1212.5	0.73	0.00	0.00	0.04	0.8
Linde, LLC (BOC Gases)	SM	60.5	245	102.5	178.5	102.5	689.0	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
Macdermid Inc.	TV	195.25	23.5	155.0	397.0	422.0	1192.8	3.29	0.00	0.00	5.03	8.3
Magco, Inc.	SM	NO DATA	14.5	NEW	NEW	NEW	14.5	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
Magellan Midstream Partners	TV	457.25	517.75	633.8	173.0	648.0	2429.8	2.57	0.30	5.48	1.83	10.2
McConnel Johnson, North Market	SM	NO DATA	8	0.5	NO DATA	14.0	22.5	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
Medal, L.P. Air Liquide	SM	70.5	4	0.0	83.0	53.0	210.5	3.62	0.01	0.01	2.18	5.8
Metal Masters Foodservice Equipment Corp.	SM	NO DATA	45.5	136.0	84.0	43.0	308.5	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
Micropore	SM	13	98.5	87.5	NEW	NEW	199.0	0.00	0.00	0.00	6.48	6.5
Middletown Materials LLC	SM	21.5	41	22.5	5.0	NO DATA	90.0	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
Mike Davidson Excavating	SM	87	44	112.3	79.0	58.0	380.3	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
Mountaire Farms Frankford	SM	147	102.5	41.3	127.0	27.0	444.8	8.60	15.78	33.96	0.05	58.4
Mountaire Farms Millsboro	TV	356.5	494.25	156.0	276.0	167.0	1449.8	33.15	23.57	163.30	0.20	220.2
Mountaire Farms Selbyville	TV	158	100.5	75.0	125.0	267.0	725.5	17.56	4.31	54.52	0.10	76.5
Nanticoke Memorial Hospital	SM	22	27.75	28.8	25.0	24.0	127.5	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
Noramco Inc.	SM	28	54	95.5	175.0	97.0	449.5	0.64	0.02	0.02	1.89	2.6
NRG Dover Energy Center	TV	496.75	320.25	324.0	183.0	282.0	1606.0	357.90	92.22	1,870.74	2.35	2,323.2
Orient Corporation of America	SM	159.25	243.25	197.3	42.0	61.0	702.8	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
OSG America	TV	153.5	243.25	394.8	305.0	221.0	1317.5	0.02	0.00	0.00	1,461.90	1,461.9
Pat's Aircraft LLC	SM	250.75	95	90.5	40.0	3.0	479.3	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
Perdue Agri-recycle LLC	SM	87	55.5	271.8	111.0	227.0	752.3	3.37	12.84	7.25	0.03	23.5

**Title V Fee Committee Status Report
August 28, 2012**

Company Name	Classification	2011 Hours	2010 Hours	2009 Hours	2008 Hours	2007 Hours	5 Year Total	2008 NO ₂ Emissions (tons/year)	2008 PM ₁₀ Emissions (tons/year)	2008 SO ₂ Emissions (tons/year)	2008 VOC Emissions (tons/year)	2008 Total Emissions (tons/year)
Perdue Farms Inc. - Georgetown	TV	169.25	115.5	63.0	53.0	119.0	519.8	17.16	7.26	113.61	0.12	138.2
Perdue Farms Inc. - Milford	SM	19.75	26.75	52.0	31.0	19.0	148.5	6.76	0.55	16.87	0.20	24.4
Perdue Grain & Oilseed LLC (Bridgeville)	SM	28.25	73.5	22.0	20.0	80.0	223.8	12.76	35.19	76.80	0.08	124.8
PGR Holdings	SM	18.5	102.5	37.0	44.0	24.0	226.0	0.82	0.54	0.13	0.30	1.8
Pinnacle Foods Corporation	SM	38.5	25.75	12.3	5.0	13.0	94.5	12.98	3.13	39.32	0.83	56.3
Port Contractors	SM	206.5	88.25	54.8	NO DATA	NO DATA	349.5	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
Prince Minerals	SM	143.75	133	56.5	156.0	175.0	664.3	0.32	0.29	0.00	0.00	0.6
Printpack, Inc.	TV	192.5	259.75	602.8	82.0	119.0	1256.0	2.44	0.01	0.01	41.77	44.2
Proctor & Gamble, Dover Wipes	SM	54	0.5	16.5	75.0	85.0	231.0	0	0	0	0	0
River Asphalt	SM	17.5	16	28.3	20.0	211.0	292.8	9.29	0.76	11.79	3.01	24.8
River II LLC	SM	112.25	66	44.5	63.0	121.0	406.8	5.22	4.32	5.50	3.03	18.1
Rohm and Haas Electronic Materials	TV	185.75	286.5	158.3	250.0	199.0	1079.5	3.98	0.12	0.06	7.13	11.3
Sea Watch International LTD	SM	25.5	19.5	32.3	85.0	73.0	235.3	6.03	0.03	0.04	0.33	6.4
Seaford Concrete Products	SM	22	47.75	NEW	NEW	NEW	69.8	NEW	NEW	NEW	NEW	NO DATA
Siemens Medical Solutions	SM	0.75	32.5	15.5	39.0	NO DATA	87.8	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
SPI Pharma Inc.	SM	184.25	90.25	79.0	24.0	34.0	411.5	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
St. Francis Hospital	SM	0	0	19.0	32.0	56.0	107.0	3.96	0.03	0.03	0.25	4.3
Strobert Tree Service	SM	17	141.25	5.5	76.0	98.0	337.8	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
Sunoco	TV	373	482.5	411.5	290.0	342.0	1899.0	83.05	66.39	17.01	94.30	260.7
The News Journal	SM	8.5	15	40.5	64.0	20.0	148.0	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
Transflo Terminal Services Inc.	SM	NO DATA	40.25	2.0	22.0	11.0	75.3	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
University of Delaware, Newark	TV	489.5	264.25	196.0	423.0	479.0	1851.8	21.86	0.37	2.54	6.01	30.8
Veolia Water	TV	64.25	31.5	224.0	82.0	19.0	420.8	2.49	0.16	0.52	3.47	6.6
Verisign	SM	NO DATA	12	69.0	2.0	23.0	106.0	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
Warren Beasley Power Station	TV	428.5	193	104.5	73.0	341.0	1140.0	2.09	0.87	0.12	0.22	3.3

Title V Fee Committee Status Report
August 28, 2012

Company Name	Classification	2011 Hours	2010 Hours	2009 Hours	2008 Hours	2007 Hours	5 Year Total	2008 NO₂ Emissions (tons/year)	2008 PM₁₀ Emissions (tons/year)	2008 SO₂ Emissions (tons/year)	2008 VOC Emissions (tons/year)	2008 Total Emissions (tons/year)
WL Gore and Associates	SM	10	27	152.5	84.0	56.0	329.5	0	0	0	0	0

*Please Note that DSWA Southern and Central's emissions for the 2008 Emission Inventory included Ameresco's emissions for previous Title V Status Reports. They have now been split out.