



Air Pollution Control Program Updates

Part 1

Stephen Hall, Director - Air Pollution Control Program

REGFORM

Missouri Air Compliance Seminar

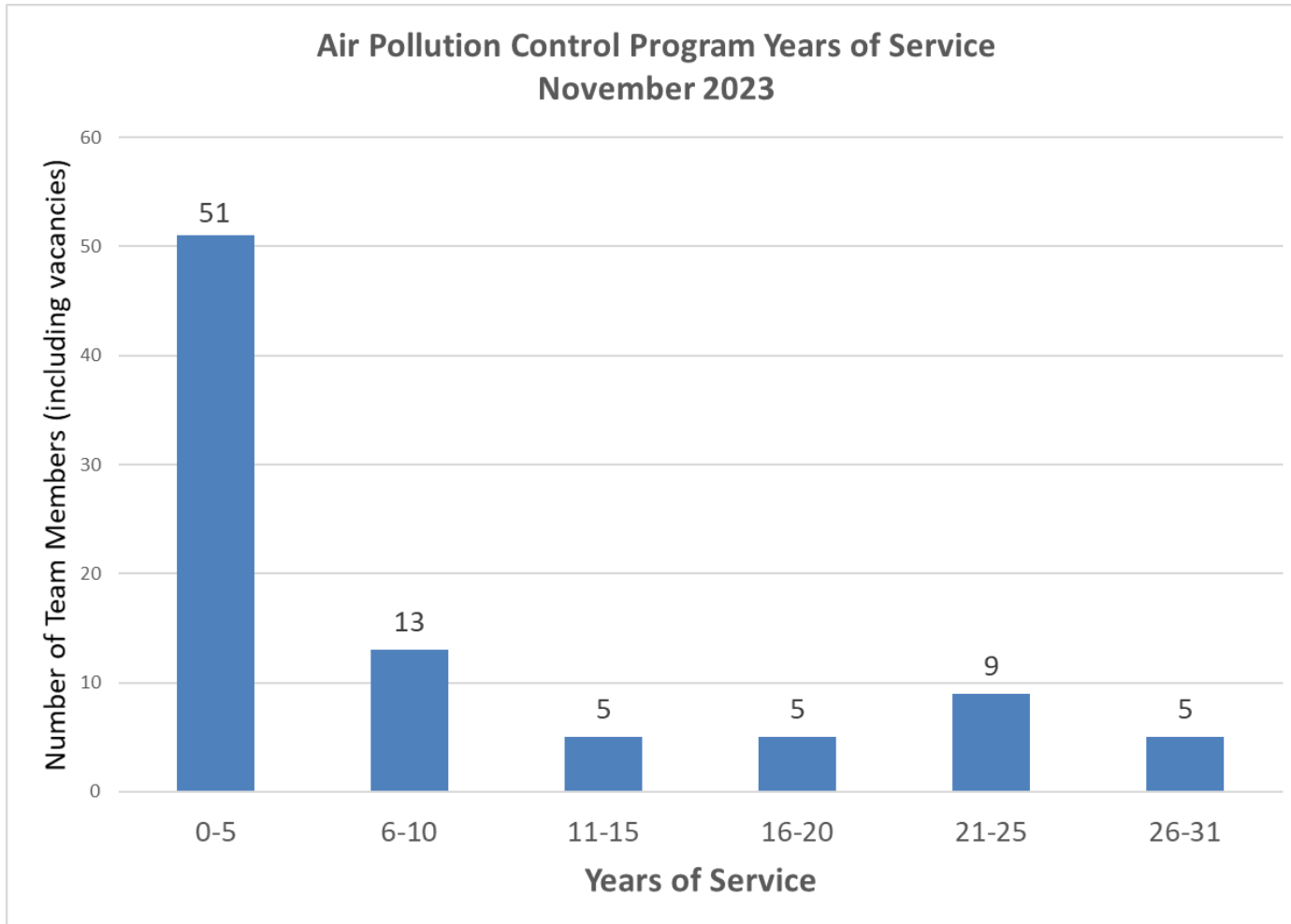
November 8, 2023

Overview

- Air Program Administrative Developments
- Permit Transparency Update
- Air Program Fee Stakeholder Process Update

Air Program Administrative Updates

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Air Program Administrative Updates

- Vacancies November 2023
 - 9
 - 4 Professional Engineers
 - 5 Other positions
- Vacancies November 2022
 - 20
- Onboarding/Training

Permit Transparency Update

Permit Transparency Update

Background:

August 25, 2022 – The Metropolitan Congregations United (MCU) requested the Department to make certain changes to the air permitting process

- Permit issuance deadlines and a public hearing requirements are in statute and rules
- Air Program held two Air Program Advisory Forum Meetings to discuss options to improve public access to permit information
- Proposed two website enhancements (accepted comments through May 22, 2023)
 - Post administratively complete permit applications
 - Opt-in to receive a public notice when issued permit projects are posted

Permit Transparency Update

- Opt-in to receive notice for Issued Permits and Complete Projects

August 4, 2023 - Began sending notices when an issued permit project is posted on the issued permits webpage

✓ 109 users signed up as of 11/3/23

- New Webpage for Permit Project Applications

September 2023 – Began posting administratively complete permit applications on the pending permits webpage

❖ Does not include 7 day portable plant relocation notices

❖ Does not include local agency minor source permits

✓ No obvious change in sunshine law requests

Permit Transparency Update

Pending Air Permits

Facility	Site ID	City, County	Permit Type	Application Number/ ID	Application Administratively Complete ▾
Redneck Outdoor Products - Application For Authority To Construct	011-0048		Construction Permit: Minor	2023-10-008	11/03/2023
Concrete Strategies - Portable Source Relocation Request	PORT-0818		Construction Permit: Portable Plant	2023-10-027	11/02/2023
Velvet Tech - Application For Authority To Construct	047-0211	Kansas City, Clay	Construction Permit: Minor	2023-10-010	11/01/2023
Capital Materials - Portable Source Relocation Request	PORT-0402		Construction Permit: Portable Plant	2023-10-032	10/31/2023
Buzzi-Lone Star - Application For Authority To Construct	031-0021	Cape Girardeau, Cape Girardeau	Construction Permit: Minor	2023-10-018	10/30/2023
Continental Products - Application For Authority To Construct	007-0051	Mexico, Audrain	Construction Permit: De Minimis	2023-10-003	10/30/2023

<https://dnr.mo.gov/air/business-industry/permits/pending>

Permit Transparency Update

Issued Air Permits

Facility	Site ID	City, County	Permit Type	Permit Number	Date issued
U.S. Army-Fort Leonard Wood, 082002-024E	169-0004	Fort Leonard Wood, Pulaski	Construction Permit: De Minimis	082002-024E	10/31/2023
Load King-Pelham Drive-Sedalia, 102023-014	159-0079	Sedalia, Pettis	Construction Permit: De Minimis	102023-014	10/31/2023
Nucor Steel-Sedalia, 092018-002B	159-0078	Sedalia, Pettis	Construction Permit: Prevention of Significant Deterioration	092018-002B	10/31/2023
Evergy Inc-Lake Road Generating Station, 2023-09-001	021-0004	St. Joseph, Buchanan	No Permit Required	2023-09-001	10/25/2023
Bayer Northern Production-Matthews, 102023-013	143-0079	Matthews, New Madrid	Construction Permit: De Minimis	102023-013	10/25/2023
Stith Funeral Home-Gallatin, 102023-012	061-0036	Gallatin, Daviess	Construction Permit: Permit-by-Rule	102023-012	10/25/2023

<https://dnr.mo.gov/air/business-industry/permits/issued>

Air Program Fee Stakeholder Process Update

Air Program Fee Stakeholder Process Update

- SB 109 extension of the air fee structure (643.079 11. and other DNR fees) to August 28, 2030
- Air Program moved forward with fee stakeholder meetings
- Air Program Advisory Forum meetings held
 - July 27, 2023 (fee program overview)
 - Aug 24, 2023 (Asbestos fees)
 - Sep 19, 2023 (Emission & Permit fees)

<https://dnr.mo.gov/about-us/forums-stakeholder-groups/air-program-advisory-forum>

Air Program Fee Stakeholder Process Update

Proposed three fee options

- Option 1 - Emission fee increase only
- Option 2 - Emission & Permit Fee increase
- Option 3 - Emission, Permit Fee, and proposed a new Base and HAP emission fee

<https://dnr.mo.gov/about-us/forums-stakeholder-groups/air-program-advisory-forum>

Air Program Fee Stakeholder Process Update

Feedback

- Preliminary takeaways from comments
 - Base fee option too high (consensus)
 - Base fee option concept? (mixed opinion)
 - Emission fee options (mixed opinion)
 - Permit fees (mixed opinion)
- November Fee stakeholder meetings
 - 11/15 emission and permit fees
 - 11/16 asbestos fees

Air Program Fee Stakeholder Process Update

Draft -Fee Calculator- Revenue estimates split out Title V vs. Non-Title V

Fee Type	Current Fee Level	Current Rate	Average # of Permits/Applications/Hours/Tests/Tons per Year	* Potential Fee Level Adjustment	Projected Additional Title V Revenue at Adjusted Fee Level	Projected Additional Non-Title V Revenue at Adjusted Fee Level
CONSTRUCTION PERMITS						
Construction Permit Review Fee (Per Review Hour) TV	\$75 per Review Hour	\$75	2344	\$150	\$175,800	
Construction Permit Review Fee (Per Review Hour) Non-TV	\$75 per Review Hour	\$75	2832	\$150		\$212,400
Construction Permit Filing Fee (Deminimis & Minor at TV facility)	\$250 per Application	\$250	68	\$300	\$3,400	
Construction Permit Filing Fee (Deminimis & Minor)	\$250 per Application	\$250	71	\$300		\$3,550
Construction Permit Filing Fee (Major)	\$5,000 per Application	\$5,000	2	\$6,000	\$2,000	
Plantwide Applicability Limit (PAL) renewal	\$2,500 per Application	\$2,500	1	\$3,500	\$1,000	
** Portable Source Relocation Filing Fee	\$300 per Application	\$300	64	\$300		\$0
** Construction Permit by Rule	\$700 per Application	\$700	11	\$700		\$0
OPERATING PERMITS						
***Operating Permit Filing Fee (Intermediate & P70) Base	\$750 to \$6,000 per Application Complexity	Varies by Complexity	78	\$500	\$39,000	
Operating Permit Complexity fee- (retain current)						
Additional Avg Permit Fees					\$221,200	\$215,950
EMISSION FEE						
Emission Fee Title V	Current \$55 per Ton	\$55	112,964	\$62.00	\$790,748	
Base Fee (Maintenance or Administrative Fee)	None currently		397	\$100.00	\$39,700	
Base Fee (any Hazardous Air Pollutant emissions)****	None currently		279	\$0.00	\$0	
Emission Fee Non-Title V	Current \$55 per Ton	\$55	8,599	\$62.00		\$60,193
Base Fee (Maintenance or Administrative Fee)	None currently		1,657	\$100.00		\$165,700
Base Fee (any Hazardous Air Pollutant emissions)****	None currently		340	\$0.00		\$0
CHARGEABLE EMISSION LIMITS ADJUSTMENT						
4,000 tons of any one pollutant and 12,000 tons of all pollutants	(requires legislature to change)					
Additional Emission Fees					\$830,448	\$225,893
Title V Shortfall					(\$2,062,746)	
Non-Title V shortfall					(\$776,082)	
Total Additional Permit & Emission Fees					\$1,051,648	\$441,843
Total Permit & Emission Fee Shortfall					(\$2,062,746)	(\$776,082)
Additional Revenue-Shortfall = Remaining Shortfall					(\$1,011,098)	(\$334,239)

Questions

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