

Draft Fee Schedule

New Source Review Fees Hourly Rate Analysis

DRAFT

As of: November 2021 (excludes flat fees)

	NSR Direct Hours	NSR Admin. Support	NSR Management
Most Common Job Class:	Environmental Engineer 5	Administrative Assistant 3	WMS Band 2
Annual Cost by Object:			
A Salaries and Wages	105,384	48,996	99,024
B Employee Benefits	38,676	17,982	36,342
E Goods and Services	4,144	4,144	4,144
G Travel	2,182	2,182	2,182
J Capital Outlays	1,201	1,201	1,201
T Intra-Agency Reimbursements	40,769	18,955	38,309
Total Objects	192,356	93,460	181,202
	Cost Per Hour	55	106
NSR Management & Support Proration ¹	none	1.89%	5.11%
Prorated Cost Per Hour ²	113	1	5
Total estimated NSR Cost Per Hour:	\$ 119.36		

Notes:

Annual Cost Estimates:

Cost estimates are based on Ecology's 2021 Standard Costs (same cost assumptions used for the 2022 Supplemental Budget Requests):

Salary estimates are current biennium actual rates at Step L.

Benefits are the agency average of 36.7% of salaries.

Goods and Services are the agency average of \$4,144 per direct program FTE.

Travel is the agency average of \$2,182 per direct program FTE.

Equipment is the agency average of \$1,201 per direct program FTE.

Average cost changes per biennium are estimated at 4.7% and align with the cumulative rate of inflation

Agency Administrative Overhead is calculated at the federally approved agency indirect rate of 28.3% of direct program salaries and benefits, and is shown as Object T.

Most Common Job Class & NSR Management & Support Proration:

Based on actual NSR fee eligible hours charged Fiscal Year 2017 through Fiscal Year 2021.

Reference: WAC 173-455-120

¹ Total hours of AA3 and WMS2 divided by total hours of EE5 (based on analysis by job class).

² For every hour of an EE5 add 0.019 of an AA3 and 0.051 of an WMS2.

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Analysis by Job Class

Data Source: AFRS (five years of historical data)

Job Class	Job Class Category	Total Hours
Environmental Engineer 5	NSR Direct Hours	6,291
Environmental Engineer 3	NSR Direct Hours	6,235
Toxicologist 3	NSR Direct Hours	1,525
Environmental Specialist 4	NSR Direct Hours	627
Environmental Engineer 2	NSR Direct Hours	296
Environmental Specialist 1	NSR Direct Hours	110
Natural Resource Scientist 4	NSR Direct Hours	103
Environmental Specialist 3	NSR Direct Hours	33
Environmental Planner 3	NSR Direct Hours	3
Environmental Specialist 2	NSR Direct Hours	2
Environmental Engineer 6	NSR Direct Hours	1
		15,225

Administrative Assistant 3	NSR Admin. Support	226
Community Outreach & Environ E	NSR Admin. Support	37
Forms & Records Analyst 3	NSR Admin. Support	14
Secretary Senior	NSR Admin. Support	7
Communications Consultant 2	NSR Admin. Support	4
IT Systems/App Spec 6	NSR Admin. Support	0
		288

WMS Band 2	NSR Management	464
WMS Band 1	NSR Management	315
		778

For every hour of an EE5 (Direct Hours), add:

And

0.019 Hours of an AA3 for Admin. Support

0.051 Hours of a WMS2 for Management Support

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Job Class Assumptions

Data Source: AFRS (five years of historical data)

Job Class	Job Class Category	Total Hours
ADMINISTRATIVE ASSISTANT 3	NSR Admin & Support	226.10
COMMUNITY OUTREACH & ENVIRON ED SPEC 3	NSR Admin & Support	36.80
FORMS & RECORDS ANALYST 3	NSR Admin & Support	13.50
SECRETARY SENIOR	NSR Admin & Support	7.40
COMMUNICATIONS CONSULTANT 2	NSR Admin & Support	4.00
IT SYSTEMS/APP SPEC 6	NSR Admin & Support	0.30
ENVIRONMENTAL ENGINEER 5	NSR Direct Hours	6,291.30
ENVIRONMENTAL ENGINEER 3	NSR Direct Hours	6,234.80
TOXICOLOGIST 3	NSR Direct Hours	1,524.70
ENVIRONMENTAL SPECIALIST 4	NSR Direct Hours	627.30
ENVIRONMENTAL ENGINEER 2	NSR Direct Hours	295.50
ENVIRONMENTAL SPECIALIST 1	NSR Direct Hours	109.80
NATURAL RESOURCE SCIENTIST 4	NSR Direct Hours	103.00
ENVIRONMENTAL SPECIALIST 3	NSR Direct Hours	33.30
ENVIRONMENTAL PLANNER 3	NSR Direct Hours	3.00
ENVIRONMENTAL SPECIALIST 2	NSR Direct Hours	2.00
ENVIRONMENTAL ENGINEER 6	NSR Direct Hours	0.50
WMS BAND 2	NSR Management	463.50
WMS BAND 1	NSR Management	314.50
Total		16,291.30

NSR Notes and Information for Stakeholders

See also: Notes on the "NSR Hourly Rate" tab.

The New Source Review program is mandated by and part of Title I of the Clean Air Act (CAA), and consists of three permitting programs:

Minor NSR in all areas.

Major NSR in attainment areas - Prevention of Significant Deterioration (PSD).

Major NSR in nonattainment areas.

While there is some overlap with parts of the CAA Title V major operating permitting program, the two NSR major programs are distinct separate permitting programs from the Title 5 major permit program, and are based on separate criteria.

The NSR hourly rate has not been updated since 2012.

The program is unable to sufficiently recuperate the costs to administer this portion of the program which has depleted the Air Pollution Control Account on an ongoing basis. This fee increase is critical to making the program solvent.

Department of Ecology staff track time:

During pre-application assistance.

Drafting the permit.

Reviewing the permit application for completeness.

Reviewing actual and potential facility emissions.

Reviewing proposed control technologies.

Performing modeling to determine if impacts meet ambient air quality standards.

Communicating with the source, and coordinating with other regulatory agencies.

Posting for public comment or a public hearing and responding to received comments.

Example of average cost changes per biennium at 4.7%:

\$ 95.00 2009-11

\$ 99.47 2011-13

\$ 104.14 2013-15

\$ 109.03 2015-17

\$ 114.16 2017-19

\$ 119.52 2019-21