

# Air Quality Rulemaking

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Air Quality Program





# Registration Program Background

## Registration Program Background

- Purpose
  - Keep a current & accurate record of sources
  - Evaluate effectiveness of air pollution controls
  - Verify facility compliance with air quality requirements



WAC 173-400-099(1)



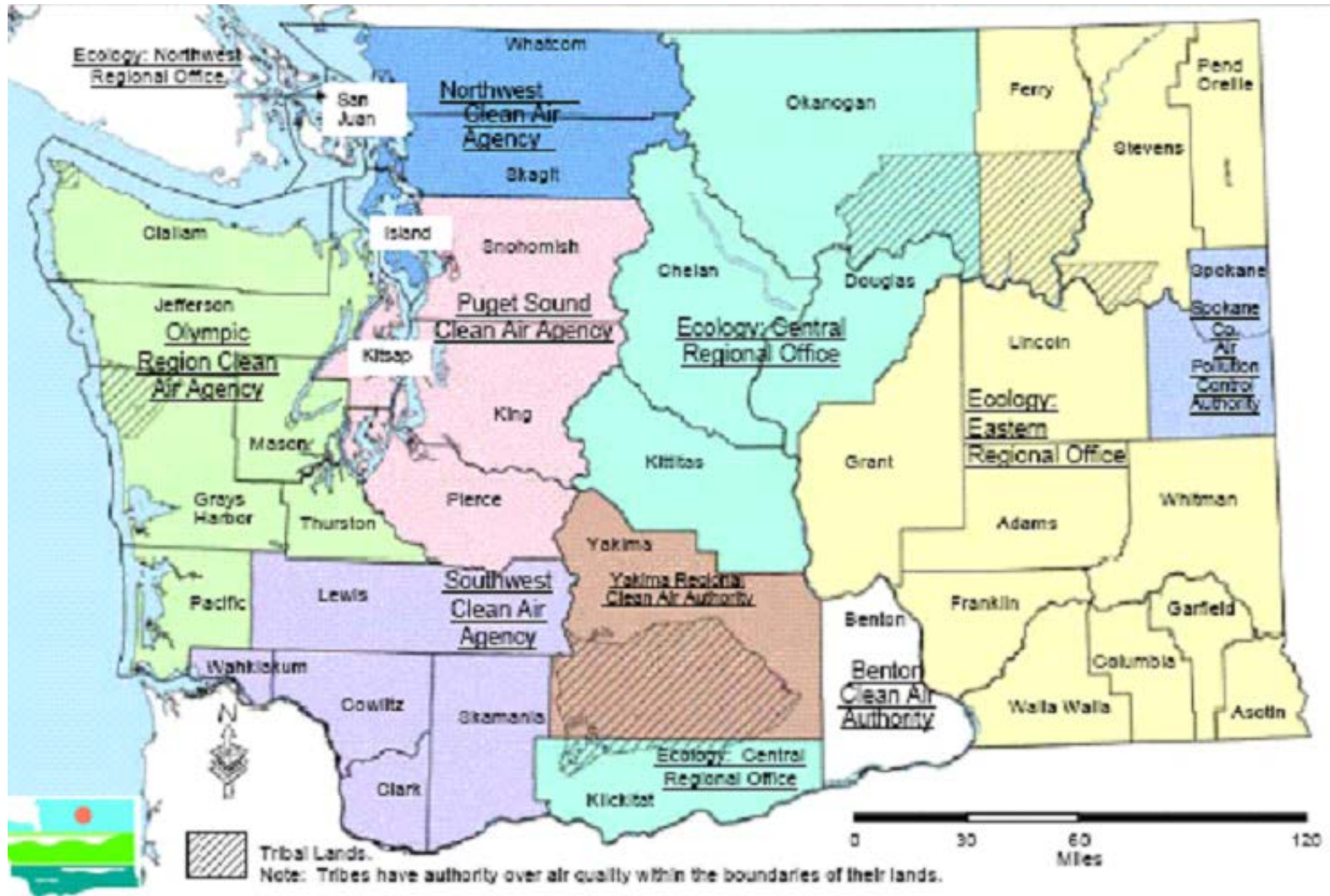
# Registration Program Background

- Components
  - Initial registration, and annual or periodic reports
    - » Process information
    - » Type & quantity of air contaminant emissions
  - On-site inspections
  - Data management system
  - Emissions inventories, including staff review
  - Clerical & administrative support

WAC 173-400-099(2)  
RCW 70.94.151



# Ecology has over 500 registered sources



## Registration Program Background

- A source's pollutant emission rates determine its placement in one of the following registration categories
  - Exempt.....131
  - Periodic
    - » small.....267
    - » medium.....48
    - » large.....21
  - Annual (includes SM80)....28



## Current Registration Fee Table

Pollutant (in Tons per Year)	Registration Category				
	"Exempt"	Small	Medium	Large	Annual
Carbon Monoxide (CO)	< 5	5 to < 15	15 to < 30	30 to < 100	> 100
Lead	< 0.005	0.005 to < 0.3	0.03 to < 0.45	0.45 to < 0.6	> 0.6
Nitrogen Oxides (NO <sub>x</sub> )	< 2.0	2.0 to < 5	5 to < 14	14 to < 40	> 40
Total Suspended Particulates (TSP)	< 1.25	1.25 to < 6	6 to < 12	12 to < 25	> 25
PM <sub>10</sub>	< 0.75	0.75 to < 3.5	3.5 to < 7	7 to < 15	> 15
PM <sub>2.5</sub>	< 0.5	0.5 to < 2	2 to < 5	5 to < 10	> 10
Sulfur Dioxide (SO <sub>x</sub> )	< 2.0	2.0 to < 5	5 to < 14	14 to < 40	> 40
Volatile Organic Compounds (VOCs)	< 2.0	2.0 to < 5	5 to < 14	14 to < 40	> 40
Toxic Air Pollutants (TAPs)	< de minimis	> de minimis			

WAC 173-455-040 (4)( c)



## Registration Program Background

- Current registration fee for each program category
  - Exempt (from fees).....\$0
  - Periodic
    - » small.....\$450
    - » medium.....\$700
    - » large.....\$1,000
  - Annual
    - » \$1,057 + complexity factor + \$16 per ton

WAC 173-455-040





## Registration Program Background

- Registration program fees allowed to cover the cost of program
- The fees cover Ecology's costs to
  - Register, inspect, collect and estimate facility emissions
  - Assess and collect fees
  - Review tests and reports
  - Verify that businesses are meeting their air pollution control requirements

RCW 70.94.151



## Registration Program Background

- Current fees fund approximately 45% of fee-eligible operating costs
- Last revision was 5 years ago

Oct 2016 workload analysis  
2015 registration fees collected



## Registration Program Background

- Efficiencies/goals
  - Update data management system
  - Tracking of staff hours
  - Optimize staff time
    - » Combine site visits
    - » Updated field tools





# Registration Program Rulemaking Objectives

## Rulemaking Objectives

- Change registration program categories to better align fees with costs of program
- Revise fees to create an equitable distribution across all registered sources



## Rulemaking Objectives

- Move toward 100% cost recovery for fee-eligible registration activities
- Align Chapters 173-400 and 173-455 WAC
- Move fees out of regulation into fee schedule





# Registration Program Possible Changes

- What's not changing:
  - No additional staff
  - No changes to payment plan
    - » Any source may apply to pay their yearly registration program fee on a payment schedule
  - No changes to extreme hardship fee reduction
    - » A business may apply for an extreme hardship fee reduction





## Possible changes

- Not currently in either rule
  - You are in the registration program if you have a Notice of Construction approval order (aka “permit”)
  - You’re retroactively registered for the entire calendar year if permit is obtained any time in the year
  - Permit is invalid if annual registration fee isn’t paid



## Possible changes

- Changes to fee process
  - Currently fees are in WAC 173-455
  - Fee amounts will be removed from the rule
  - Ecology will post a fee schedule on its website
    - » similar to other Ecology air quality programs



## Possible changes

- Components of source registration fee:
  - base fee
  - emissions, including toxic air pollutants
  - source complexity
  - source testing
  - compliance re-inspections



## Possible changes – base fee component

- Base fee
  - apply to all registered sources
  - sources in lowest registration category pay only base fee
    - »e.g. sources operating under auto body general order



## Possible changes – base fee component

- Base fees of local clean air agencies
  - BCAA \$350 or \$750
  - NWCAA \$633
  - ORCAA \$243
  - PSCAA \$140 or \$1,150
  - SRCAA \$264
  - YRCAA \$453
- Ecology doesn't currently have a base fee



## Possible changes – emissions component

- Emissions fee, including toxic air pollutants (TAP), of local clean air agencies
  - ORCAA \$51/ton
  - BCAA \$50/ton criteria, \$150/TAP
  - NWCAA \$633 - \$10,679
  - PSCAA \$60/ton
  - SRCAA \$83/ton
  - SWCAA \$45/ton criteria; \$25/ton TAP
- Ecology currently has an emissions fee for annual sources of \$16/ton



## Possible changes – other fee components

- Source complexity fee
  - SRCAA \$83 per stack/point
  - SWCAA \$90 per emission unit
- Ecology currently has a complexity fee for annual sources only
- Synthetic minor fee
  - BCAA \$1,500
  - NWCAA \$2,143
  - PSCAA \$2,300
  - SRCAA \$1,988
  - YRCAA \$2,660
- Ecology doesn't currently have a synthetic minor fee



## Possible changes – other fee components

- Source test fee
  - BCAA actual cost
  - NWCAA \$1,160 per pollutant, per unit
- Compliance re-inspection fee
  - BCAA greater of \$500 or actual costs
  - ORCAA \$101
- Ecology doesn't currently have these fees





## Possible changes – other fee components

- Other fees

- Subject to NSPS/NESHAP
  - » NWCAA \$2,143
- Continuous Emissions Monitoring Systems (CEMS)
  - » BCAA actual costs
  - » NWCAA \$1,230

- Ecology doesn't currently have these fees



# Questions and Discussion



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Our  
time is  
almost  
up!