



# Cleaner Air Oregon

## REFORMING OREGON'S INDUSTRIAL AIR QUALITY REGULATIONS

Inviting Oregonians to help create new regulations that protect what we all care about: the health of our people and our planet, and the economic vitality of our communities.

## Cleaner Air Oregon Resource Needs and Fee Options

# Staffing Model and Fees

## Seeking input on Discussion Draft Staffing Model and Fee Options

### Discussion Draft Staffing Model

#### Fee Funded Work (9.05 FTE)

##### *Department of Environmental Quality*

##### **1.0 FTE Environmental Engineer 3**

Lead technical staff for Cleaner Air Oregon: reviews risk assessment applications, coordinates with regional permit writers, develops and reviews permit attachments, leads TBACT reviews, and develops internal training plans.

##### **3.0 FTE Natural Resource Specialist 4 (Permit Writers)**

Develops permit attachment in coordination with EE3 and regional permitting staff, reviews community engagement plans in consultation with the Oregon Health Authority, provides technical assistance to facilities regarding permitting requirements and supports internal training activities.

##### **1.0 FTE Natural Resource Specialist 4 (Modeler)**

Provides technical assistance to sources on risk assessment modeling protocol development, reviews and approves risk assessment modeling protocols, reviews and approves risk assessment modeling results, conducts area multi-source risk determinations.

##### **1.0 FTE Natural Resource Specialist 4 (Risk Assessor)**

Provides technical assistance to sources on health risk assessment protocol development, reviews and approves health risk assessments, supports risk communication activities, and consults with the Oregon Health Authority on updates to Risk Based Concentrations.

Cleaner Air Oregon – Discussion Draft Base Fee Options

		EXISTING FEES		ALTERNATIVE 1		ALTERNATIVE 2	
		Fee	Revenue Generated	Cleaner Air Oregon Base Fee	Revenue Generated	Cleaner Air Oregon Base Fee, Call-in Fee and Activity Fees	Revenue Generated*
Basic ACDP		\$ 479	\$ 114,048	\$ 132	\$ 31,457	\$ 113	\$ 26,897
General ACDP	Fee Class One	\$ 959	\$ 286,848	\$ 265	\$ 79,120	\$ 226	\$ 67,649
General ACDP	Fee Class Two	\$ 1,726	\$ 448,618	\$ 476	\$ 123,740	\$ 407	\$ 105,800
General ACDP	Fee Class Three	\$ 2,493	\$ 268,397	\$ 688	\$ 74,031	\$ 588	\$ 63,298
General ACDP	Fee Class Four	\$ 479	\$ 161,784	\$ 132	\$ 44,624	\$ 113	\$ 38,154
General ACDP	Fee Class Five	\$ 159	\$ 115,488	\$ 44	\$ 31,855	\$ 37	\$ 27,236
General ACDP	Fee Class Six	\$ 319	\$ 17,568	\$ 88	\$ 4,846	\$ 75	\$ 4,143
Simple ACDP	Low Fee	\$ 2,557	\$ 147,456	\$ 705	\$ 40,672	\$ 603	\$ 34,775
Simple ACDP	High Fee	\$ 5,114	\$ 417,024	\$ 1,411	\$ 115,026	\$ 1,206	\$ 98,349
Standard ACDP		\$ 10,229	\$ 1,230,336	\$ 2,821	\$ 339,358	\$ 2,412	\$ 290,158
Title V	Base	\$ 8,163	\$ 881,604	\$ 2,252	\$ 243,169	\$ 1,925	\$ 207,914
Title V	Emissions	\$ 61.72	\$ 2,992,021	\$ 17.02	\$ 825,276	\$ 14.56	\$ 705,626
<b>Total</b>			\$ 7,081,191		\$ 1,953,173		\$ 1,670,000

# Staffing Model

## General Fund Resources

- Six existing positions, authorized in 2016
- Currently focused on rule-development
- Positions will support Cleaner Air Oregon implementation

Manager  
PEME

Project Manager  
PA3

Tech/Admin  
Support  
OPA1

Emissions  
Inventory  
NRS3

Toxicologist  
NRS4

Communications  
Staff  
PAS2

PA = Program Analyst

PEM = Principal Executive Manager

OPA = Operations and Policy Analyst

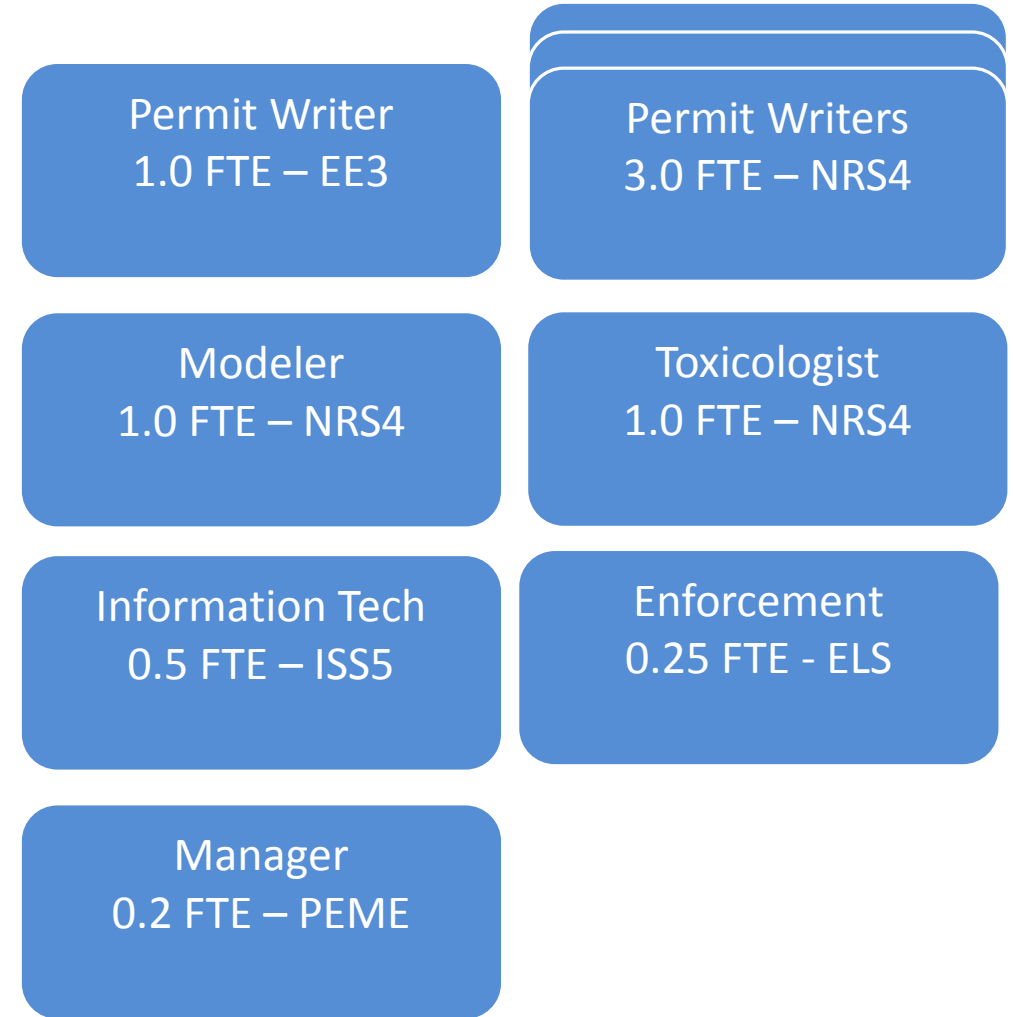
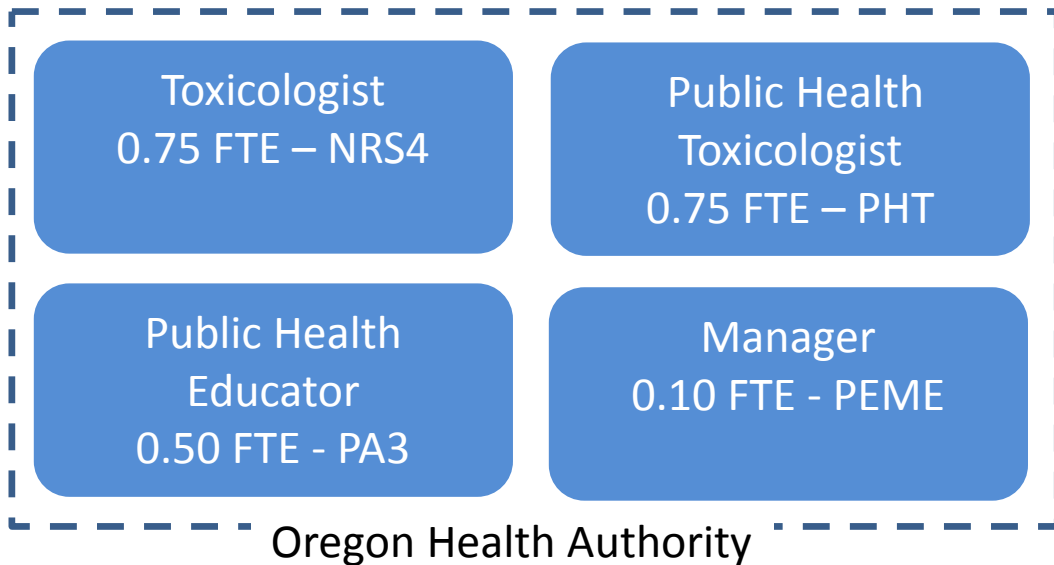
NRS = Natural Resource Specialist

PAS = Public Affairs Specialist

# Staffing Model

## Proposed Fee Funded Resources

- 9.05 FTE = \$1.95 million
- Phased-in after rule adoption
- Multi-agency



FTE = Full Time Equivalent  
EE = Environmental Engineer  
PA = Program Analyst  
PA = Program Analyst

PEM = Principal Executive Manager  
OPA = Operations and Policy Analyst  
NRS = Natural Resource Specialist  
PAS = Public Affairs Specialist

ISS = Information Systems Specialist  
ELS = Environmental Law Specialist

# Fee Options

## Alternative 1

- A 'base' fee paid by all permitted sources, covers all program projected costs
- The base fee would be equivalent to 27.6% of 2016 fees
- No additional fees based on program applicability, 'call-in,' specific activity, etc.

# Fee Options

## Alternative 2

- A smaller base fee on all permitted sources, with “activity” fees (equivalent to 23.6% of 2016 fees)
- A ‘call-in’ fee assessed on existing facilities as they enter the program
- Specific activity fees assessed when an application is submitted

# Challenges and issues considered

- Program is new
- Delayed scoping and implementation preparation
- Unknown results of risk profiles means activity fees are unknown
- Level of effort

# Discussion Questions

- Is the **Discussion Draft Staffing Model** sufficient to meet the needs of Tier 1 implementation?
- Are there specific elements of the program that need fewer or additional resources?
- What advantages and disadvantages do you see related to the two **Fee Options**?
- What other Fee Structures/Options should the agencies explore? Especially to aid small businesses?