



**Final Report:
Washington Department of Ecology
Title V Program Review
(2nd Round)**

EPA Region 10
September 22, 2014

Table of Contents

I.	Introduction.....	3
	Ecology’s Title V Program.....	3
	Program Review Objective and Overview	3
	Program Review Report.....	5
II.	Follow-up to 2006 Program Review	6
	Section A. Title V Permit Preparation and Content.....	6
	Section C. Monitoring.....	10
	Section D. Public Participation and Affected State Review	11
	Section E. Permit Issuance / Revision / Renewal	12
	Section F. Compliance	13
	Section G. Resources and Internal Management Support	14
	Section I. Document Review (Rules/Forms/Guidance).....	15
III.	Additional Review.....	16
	Compliance Assurance Monitoring Background.....	16
	Compliance Assurance Monitoring Comments	16
	Additional Comments	17
IV.	Summary of Concerns and Recommendations	19

Attachment

- 1 Program Review Information Request, August
- 2 Program Review Information Request Response (email and response to questions)
- 3 Ecology Statement of Basis Outline Template
- 4 Air Operating Permit Report, Fiscal Year 2013
- 5 Washington Air Operating Permit Program Audit Report, Calendar Year 2010
- 6 Ecology Workload Analysis and Budget, Fiscal Year 2014/2015

I. Introduction

This report documents the second review of the Washington Department of Ecology's Title V permitting program. The first Title V program review for Ecology was completed in September 2006.

Ecology's Title V Program

Ecology is a state air pollution control agency with jurisdiction in 18 of the 39 counties in Washington and for all chemical pulp mills and aluminum smelters in Washington with a few exceptions. The Energy Facility Site Evaluation Council has jurisdiction for all thermal electric energy projects that are at least 350 megawatts in size. The EPA Region 10 is the Title V permitting authority in Indian country throughout Washington with one exception: the Puget Sound Clean Air Agency is the Title V permitting authority on non-trust land within the 1873 Survey Area of the Puyallup Reservation. Seven local agencies have Title V jurisdiction in the other 21 counties in Washington.

Ecology's Title V regulation is found in Washington Administrative Code 173-401. Region 10 granted Ecology, along with the seven local agencies and the EFSEC, interim approval of its Title V program effective December 9, 1994, and full approval effective September 12, 2001, 66 FR 42439 (August 13, 2001). A revision to Ecology's program was approved on January 2, 2003, 67 FR 71479 (Dec 2, 2003).

Ecology issues Title V permits to approximately 27 sources through four different offices: the Eastern Regional Office in the state's Air Quality Program (12 permits in 12 counties); the Central Regional Office in the state's Air Quality Program (5 permits in 5 counties); the Richland Regional Office in the state's Nuclear Waste Program (1 permit for the U.S. Department of Energy's Hanford facility); and the Industrial Section in the state's Solid Waste and Financial Assistance Program (9 permits for chemical pulp mills and aluminum smelters). The Northwest Regional Office has no Title V sources in the one county for which they are responsible. There are about 10 permit engineers at Ecology that spend at least some of their time on Title V permits (approximately 6.5 FTE); all of the Title V staff have non-Title V duties as well.

Program Review Objective and Overview

The Title V program reviews were initiated in response to recommendations in a 2002 Office of Inspector General audit. The objective of broader program reviews (as opposed to individual permit reviews) is to identify good practices that other agencies can learn from, document areas needing improvement and learn how the EPA can help improve state and local Title V programs and expedite permitting. The EPA set an aggressive initial national goal of reviewing all state and local Title V programs with 10 or more Title V sources. Ecology was one of ten Title V programs reviewed between 2004 and 2007. Here is the list of agencies reviewed in the first round along with the final report date and the current number of Title V sources they regulate:

Permitting Authority (first round)	Report Date	Permits
Idaho Department of Environmental Quality	January 2004	59
Oregon Department of Environmental Quality	June 2006	123
Lane Regional Air Protection Agency (OR)	June 2006	19
Spokane Regional Clean Air Agency (WA)	August 2006	10
Puget Sound Clean Air Agency (WA)	September 2006	35
Washington Department of Ecology	September 2006	27
Northwest Clean Air Agency (WA)	September 2006	21
Alaska Department of Environmental Conservation	September 2006	158
Olympic Regional Clean Air Agency (WA)	September 2007	15
Southwest Clean Air Agency (WA)	September 2007	12

In response to a follow-up review by the Office of Inspector General, the EPA also committed to repeat the reviews of all Title V programs with 20 or more Title V sources every four years beginning in 2007. Based on current permit numbers, the second round will cover each of the four state programs in Region 10 (Alaska, Idaho, Oregon and Washington) as well as two local agencies (Puget Sound Clean Air Agency and Northwest Clean Air Agency). Region 10 plans to tailor all second round reviews to each agency. To date, three second-round program reviews in Region 10 have been completed. Region 10 began Ecology’s second round review in 2008, but didn’t finish the report before the project was postponed. Below is the list of agencies reviewed to date in the second round along with the final report date. All of the program review reports can be found on Region 10’s air permitting website.

Permitting Authority (second round)	Report Date
Idaho Department of Environmental Quality	September 2007
Puget Sound Clean Air Agency (WA)	September 2008
Northwest Clean Air Agency (WA)	September 2013

The first Title V program review looked at all major elements of a Title V program. With this second-round review, Region 10 has elected to focus on issues specific to Ecology’s implementation of their permitting program. Of particular interest is how Ecology has addressed the concerns identified in the first review. Region 10 is also interested in Ecology’s permit issuance progress and compliance assurance monitoring (which is required to be added during permit renewal for most sources) and how Ecology has integrated new requirements and rules into their permits and program.

In preparation for this second-round review, Region 10 requested specific information from Ecology (Attachment 1). Region 10 reviewed Ecology’s response (Attachment 2) which included Ecology’s statement of basis outline (Attachment 3), the 2013 Air Operating Permit financial report (Attachment 4) and the 2010 Air Operating Permit Audit (Attachment 5). Included with Ecology’s response are the answers provided for the program review that was begun in 2008. As part of an ongoing annual “internal” review, the 2010 Audit was performed by one person from Ecology and one person from a local Washington permitting agency. Region 10 also reviewed permit issuance data Ecology reported to the Title V Operating Permits System. Permits selected for review were issued within the last few years to provide a more accurate depiction of how Ecology permits changed since the first program review. The permits reviewed include:

<u>Permit No.</u>	<u>Company Name (Location)</u>	<u>Date Issued</u>
0000256	Georgia Pacific – Camas, WA	June 25, 2014
13AQ-C181	SDS Lumber Company – Bingen, WA	September 30, 2013
08AQ-E252	Boise Building Solutions – Kettle Falls, WA	January 12, 2010

While on site at Ecology’s office on September 3, 2014, Region 10 staff interviewed permit writing staff, accounting staff and three program managers. The purpose of the interviews was to clarify and discuss what was learned from the review of their permits and other information. Region 10 and Ecology discussed permit issuance progress, program resources (and fee program), general program implementation topics, and specific issues identified during the previous review of Ecology’s program as well as compliance assurance monitoring. During the interviews, Ecology financial staff provided Region 10 with workload analysis and budget spreadsheets for fiscal years 2014 and 2015 (Attachment 6).

During the on-site interviews, Ecology requested some examples and guidance that were discussed. Region 10 sent a link to two documents available online. EPA’s policy on writing enforceable limits on potential to emit (Guidance on Limiting Potential to Emit in New Source Permitting, 6/13/1989) can be found by following this link: <http://www.epa.gov/region07/air/title5/t5memos/lmitpotl.pdf>. An example of a Region 10-issued permit (Warm Springs Forest Products) that contains synthetic minor limits and statement of basis that contains a compliance assurance monitoring applicability analysis, can be found at this link: http://yosemite.epa.gov/R10/airpage.nsf/Public+Notices/warm_springs_forest_caa.

Program Review Report

This program review report is presented in four main sections:

- I. Introduction
- II. Follow-up to 2006 Program Review
- III. Additional Review
- IV. Summary of Concerns and Recommendations

The introductory section presents some background regarding Ecology’s Title V program as well as an overview of Region 10’s program review plan. Section II presents Region 10’s evaluation of Ecology’s progress in resolving concerns identified in the 2006 program review. Section III presents observations from Region 10’s review of Ecology’s fee program, permit progress and of three permits with a specific focus on compliance assurance monitoring. Finally, Section IV summarizes Region 10’s second-round concerns and presents Region 10’s recommendations for resolving any outstanding issues.

II. Follow-up to 2006 Program Review

In the initial Title V program review, finalized in September 2006, Region 10 provided observations delineated into nine separate topic areas labeled A thru I. In each section, Region 10 identified good practices, concerns and other observations. Following that initial report, Region 10 asked Ecology to respond to the concerns identified. In November, 2006, Ecology responded to Region 10. Region 10 informed Ecology that we would be doing a second program review in the near future.

This section of the second-round review report presents Region 10's evaluation of the progress Ecology has made in addressing the concerns identified in the initial program review. Each of Region 10's original concerns is listed below, followed by Ecology's response received in November 2006, and followed yet again by Region 10's second-round (Round 2) evaluation. Where it is helpful, information gathered during the aborted 2008 review is also noted and discussed.

Section A. Title V Permit Preparation and Content

A-1 2006 EPA Concern: While the permit formats varied some between offices, the content of the statements of basis varied greatly even between permit writers within the same office, resulting in a broad range of concerns. The statement of basis should include, among other things, a discussion of the monitoring and operational restrictions for each emission unit; any complex applicability determinations; any non-applicability determinations; the construction and permitting history of the source; and the compliance history of the source including inspections and any violations noted.¹ Some statements of basis lacked applicability discussions. For instance, there was rarely any discussion of hazardous air pollutant emissions or any other information that documented whether the source was major for hazardous air pollutants, which dictates the applicability of maximum achievable control technology standards. Some statements of basis lacked a discussion about compliance assurance monitoring applicability. Most statements of basis lacked explanations regarding the monitoring (including CAM) decisions in the permit. Finally, some statements of basis did not include thorough process descriptions. Ecology should consistently address these items in all statements of basis as permits are revised in the future.

2006 Ecology Response: Your first concern noted the disparity between Ecology offices in the content of the permit Statement of Basis. We note that there is currently no official guidance from the EPA on what SoB should look like or what it could contain. However, we agree that it would be good practice for Ecology and for the permitted entities to have a level of consistency for the SoBs throughout our different regions/programs. We will form an internal group with representatives from the Air Program, Industrial Section, and Nuclear Waste to evaluate what elements should be included in the SoB, and to create a boiler plate outline or some sort of guidance document to address this issue for future permits.

¹ Letter dated December 20, 2001 from Steven Rosenblatt, Air Programs Branch, EPA Region V, to Robert F. Hodanbosi, Chief, Division of Air Pollution Control, Ohio Environmental Protection Agency.

Round 2 Evaluation: To address Region 10's concerns, Ecology formed an internal group that met initially in 2007 and again in 2008. A statement of basis outline was created (Attachment 3), but is not used by all of Ecology permitting offices. The workgroup also considered creating a quick reference guide for staff to ensure MACT, NSPS and NESHAP requirements are addressed, but that work has not been completed. While the SoB outline appears to list most of the topics/sections that should be covered in a SoB, there is no additional guidance regarding the contents of those sections or the level of detail needed. Based on a review of Ecology permits, Ecology's SoBs still lack important information needed to explain the operating permit such as potential to emit, applicability of requirements (e.g. MACT, NSPS, NESHAP and CAM), source aggregation, and monitoring decision explanations. For specific CAM purposes, potential to emit must be presented at the emission unit level and include pre-control emissions. SoBs that cover the general topics like applicability as well as explain each permit condition are generally more complete. Region 10 informed Ecology that EPA recently published a new compilation of existing SoB guidance². Ecology's 2010 internal audit also recommended improving the content of statements of basis, noting the need for better emission unit and control equipment descriptions, discrete sections regarding federal rule applicability and CAM, and emission tables. Ecology should consider developing better internal guidance for SoB writing.

A-2 2006 EPA Concern: Possibly related to the lack of MACT applicability documentation in some statements of basis, some permits appear to be missing applicable MACT standards. Where permits were issued prior to the compliance date of an applicable MACT standard, Ecology has allowed the permitting authority to issue the permit with only a "place-holder" for the MACT standard, as long as the permit is reopened to add the MACT standard before the first compliance date. This allowed the permittee time to select their technique for complying with the MACT standard before adding it to the permit. Permits are required to be reopened when new MACT standards are promulgated if there is more than three years left before permit expiration. In either case, Ecology should review their permits to determine which should be reopened to add missing applicable MACT standards before the first compliance date.

2006 Ecology Response: On a similar note, you pointed out that some Ecology Title V permits appear to be missing applicable MACT standards. We currently have an employee who updates all permit writers on new MACT standards. We acknowledge the concern and will work with all of our AOP permit writers to remind them that these standards are to be incorporated in a timely manner.

Round 2 Evaluation: Region 10 did not identify any permits that were missing MACT standards, relying upon the limited analysis in the SoB. Placeholder language is still used in one Ecology office, but Ecology explained that that permit will be reopened before the first compliance date to incorporate the applicable MACT standard. If done, then Region 10's concern will be resolved.

² Memo dated April 30, 2014, from Stephen Page to EPA Regional Air Directors titled, "Implementation Guidance on Annual Compliance Certification Reporting and Statement of Basis Requirements for Title V Operating Permits."

A-3 2006 EPA Concern: Title V allows a “permit shield” for requirements that have been determined to be not applicable. Two reviewed statements of basis provided good explanations of the permit shield concept, particularly why permit shields should only include those requirements that might reasonably apply and for which an inapplicability determination is both useful and appropriate to document for the public record. Some permits contained permit shields without sufficient information to determine whether a shield was warranted. In some permit shields, the list of non-applicable requirements included many requirements that were clearly not applicable. Finally, some permit shields included requirements that appear to apply to the source based on the information available. Ecology should clearly document permit shields to avoid future enforcement problems. Ecology should review their permits for incorrect permit shields and reopen those that need to be corrected.

2006 Ecology Response: The next concern pertains to the permit shield concept. You noted that some of the SoBs did not contain sufficient documentation or explanation of the permit shield concept. We acknowledge this concern and agree that as a matter of good practice and to minimize potential enforceability issues it is worthwhile to establish consistency for appropriately documenting permit shields in the SoBs. We will seek to address this issue through the SoB guidance document/boiler plate outline mentioned in our response to Concern #1 in this section.

Round 2 Evaluation: While some individual decisions regarding permit shields could be better explained, most of the requirements listed under the shields in Ecology’s permits were appropriate and explained with adequate detail. In some permits, there are two sections that address permit shields that don’t reference each other which was a little confusing: one in the general permit provisos section and one in a separate inapplicable requirements section. The citations used in each of the permit shield sections are also inconsistent or missing. The SoB outline didn’t seem to resolve the permit shield inconsistencies, possibly because the shield needs to be in the permit. Ecology’s 2010 internal audit also recommended improving the documentation of permit shields, specifically noting the need for explicit rather than general shields. Ecology should clarify how to add and document permit shields in any guidance they develop.

A-4 2006 EPA Concern: Where permits paraphrase applicable requirements, it is important to clarify in the permit that wording in the underlying requirement is the enforceable wording. Some permits explained this in an introduction to the permit or at the beginning of the unit-specific requirements section of the permit; however, some permits were missing this important language. Ecology should be sure to clarify this in the future.

2006 Ecology Response: You suggested that we clarify that when applicable requirements are paraphrased in the permit, the enforceable language is that of the wording of the underlying requirement, not the paraphrase. This issue appears to be an inadvertent oversight for one single permit, not a systematic problem in our program. We will remind permit writers of this requirement so that this oversight is not continued in future permits.

Round 2 Evaluation: Ecology explained that the missing language identified in 2006 was an inadvertent oversight in one permit. Of the three permits reviewed for the second

round, one was missing the language. Ecology should clarify in any guidance they develop that standard paraphrasing language should be in every permit.

- A-5 2006 EPA Concern: Permits should clearly identify those requirements that are enforceable only by the state and not the EPA, often referred to as “state-only” requirements. While most permits labeled state-only requirements in some manner, few permits explained why the requirements were not federally enforceable. Often the state-only requirements are a result of state requirements that have not yet been submitted or approved as a revision to the state implementation plan. Some may become federally enforceable once they are approved. Ecology should consider clarifying the state-only requirements in the statements of basis when issuing permits in the future.

2006 Ecology Response: You suggested that we clarify which requirements are state-only, vs requirements that are federally enforceable. This is another issue regarding consistency for the SoBs. We will include this issue in the SoB guidance document/boiler plate outline mentioned in our response to Concern #1 in this section.

Round 2 Evaluation: Ecology’s permits utilize two techniques for labeling state-only requirements, both of which can be adequate; however, in one technique the labeling was not always clearly defined and all cases, the reason a requirement was state-only was not explained in the SoB. This is another issue that the SoB outline did not resolve but that more complete guidance could resolve.

- A-6 2006 EPA Concern: The table format used by Ecology, and other permitting authorities in Washington, can lead to difficulties for permit engineers. Some permit engineers tend to abbreviate necessary wording of rules and requirements in order to fit lengthy text into the narrow columns, which can lead to unclear or incomplete requirements. Often, substantial portions of pages are blank because all of the text is in a single column, which unnecessarily lengthens the permit without adding value. Formats that do not limit the space for writing a requirement help to ensure the requirement is written with the necessary details and formatting to make the requirement clear. See permits written by states such as Idaho and Oregon for examples. While it would likely take a considerable effort to change all of the permits to a text format, Ecology should consider the benefits of making format changes during permit renewals.

2006 Ecology Response: Concern #6 pertains to the different formats used by Ecology permit writers in different regions/programs. While we agree that consistency is an important aspect for our permits across Ecology programs, we also acknowledge that consistency does not require identical formats. We would prefer that our permit writers use a format that works for all involved in carrying out the permit and, provided baseline content and substantive requirements are met, do not feel it necessary to mandate a particular type of permit writing format at this time. However, this would be a good topic for the Title V workshop scheduled for this spring, 2007, and we would be willing to discuss this issue further.

Round 2 Evaluation: Having seen and reviewed virtually all of the permit formats used in the northwest, Region 10 has shared their opinion of formats with agencies across the region, explaining advantages and disadvantages as well as why some formats work

better for the staff writing the permit and some work better for people reading and trying to understand the permit. Writing a permit that balances those advantages and disadvantages is challenging. It is up to Ecology to decide which format works best for them.

- A-7 2006 EPA Concern: Requirements to operate and maintain equipment are often found in underlying requirements. In some permits, operation and maintenance requirements are added to help assure compliance. O&M requirements can be effective at assuring that emission units and emission control devices are not only run, but kept in good running condition. Monitoring, on the other hand, is generally used to identify problems (or assure there are no problems) while maintenance is used to avoid problems or to address identified problems. Operation and maintenance requirements do not necessarily satisfy the need to have monitoring; in fact, monitoring should be specified to assure compliance with any operation and maintenance requirements. To ensure that O&M requirements are as effective as they can be, Ecology should consider the following strategies: require submittal and possibly even approval of O&M plans; require periodic updates of O&M plans; require that O&M plans be followed; add those parts of O&M plans that are critical for assuring compliance to the permit if Ecology is relying on them to assure compliance (as the compliance technique, periodic monitoring, or CAM); and add monitoring or recordkeeping to ensure the O&M plan is being implemented.

2006 Ecology Response: The final concern raised in this section relates to the inclusion of O&M plans in the permit as a way to increase their efficacy. We do not agree that including these plans in the permit will result in increased efficiency of O&M plans. We believe that including these plans in the permit will further complicate, and add regulatory burden to an already detailed permit. We are therefore not inclined to require incorporation of O&M plans into Ecology Title V permits. However, this may be another good topic for discussion at the Title V workshop.

Round 2 Evaluation: Region 10 has never advocated putting entire O&M plans in operating permits. We have consistently suggested agencies improve their oversight of the development and use of O&M plans and add those portions (if any are appropriate) of O&M plans that are in fact monitoring requirements to the permit if it would help assure compliance. Ecology's 2010 internal audit also recommended including in permits those O&M measures necessary for assuring compliance and including in SoBs an explanation of the O&M measures added to the permit. We repeat our suggestions regarding O&M plans.

Section C. Monitoring

- C-1 2006 EPA Concern: Operating permit renewals are required to include CAM for all emission units subject to 40 CFR part 64. Some Ecology statements of basis do not explain which emissions units are subject to CAM or what decision has been made regarding CAM. Ensuring monitoring that adequately assures compliance is one of the most important purposes for Title V operating permits. Ecology should review their renewal permits and statements of basis to ensure CAM is adequately addressed for all subject emission units.

2006 Ecology Response: You commented that not all Ecology permits sufficiently document which emissions units are subject to CAM or what decision has been made regarding CAM. We acknowledge this concern, and agree that including monitoring requirements that adequately ensure compliance is a key objective of a Title V permit. We see this as a similar issue to the MACT standard discussed in Concern #2 of Section A. Including a discussion of CAM requirements is clearly required and is another issue that we would seek to incorporate into the guidance document/boiler plate outline for SOBs.

Round 2 Evaluation: The SoB outline created in response to the 2006 program review clearly did not resolve this concern. None of the permits and SoBs fully addressed CAM applicability and monitoring decisions. None of the permits addressed CAM for opacity. As part of Region 10's oversight program, several individual permit were reviewed for CAM compliance, including one Ecology permit. Region 10 provided specific input about that permit that should be shared among all of their permit writers. Ecology's 2010 internal audit also recommended addressing CAM in a specific SoB section and adding all of the CAM requirements to permits. Ecology should consider internal training as well as written guidance to address this issue. See the CAM section of this report for additional information.

Section D. Public Participation and Affected State Review

D-1 2006 EPA Concern: Like many of the permitting authorities across the country, Ecology provides the permittee with a pre-draft permit for review and comment before the draft permit goes out for public comment. Soliciting the permittee's input on the factual aspects of the permit can help to reduce errors in the permit and help educate the permittee on its obligations under the permit. Working with the permittee on developing the substantive requirements of the permit, however, can create the impression that the permit issuance process is not an open process. Ecology should carefully balance these interests as it works with permittees during the development and issuance of Title V permits.

2006 Ecology Response: You noted a potential concern regarding the openness and transparency of our permitting process as a result of providing the permittee with draft versions of the permit for review and comment prior to the public comment period. We acknowledge the concern and are mindful of this issue. We see a tremendous value in obtaining permittee input during the permitting process, not only in correcting or avoiding potential errors, but also in educating the permittees as to compliance requirements. We do have a mandated public process that we follow under state law to ensure adequate opportunity for public input to the process and transparency, and seek to continue to balance the competing interests of the permittee and the public in the permitting process.

Round 2 Evaluation: Region 10 has had the opportunity to discuss this concern with several permitting authorities. Region 10 acknowledges the advantage of reconciling some issues with the source prior to going to public comment can be beneficial to the source and Ecology; it can also be beneficial to the public in that they are seeing a version of the permit that is much closer to what the agency plans to issue. In fact, where

Ecology makes changes to a permit after the public comment period in response to comments by the company, and the public has concerns about the changes, the public's only recourse is to formally challenge the permit. Our primary concern with pre-public notice permit negotiations has been whether those negotiations (and comments) are documented and transparent. If clearly documented and made a part of the public record, then the public will be aware of all the information upon which the agency based their decisions and will have the opportunity to comment during the public comment period. As long as Ecology is careful to document changes made in response to comments made by sources, revisions as a result of negotiations prior to the public comment period are appropriate and this concern is no longer an issue.

Section E. Permit Issuance / Revision / Renewal

E-1 2006 EPA Concern: Minor permit revision applications are required by Title V to include the permittee's suggested changes to the permit and certification by a responsible official that the proposed change meets the minor permit modification criteria. Ecology also requires public noticing of minor permit modifications. Not all Ecology offices were aware of these requirements. Ecology should ensure proper processing for all permit actions, including minor permit revisions.

2006 Ecology Response: This concern relates to the familiarity of permit writers with the procedures and legal requirements for minor permit revisions. Not all Ecology permitting offices have processed a minor permit revision, and they don't appear to occur on a routine basis; however the procedures are clearly stated in WAC 173-401-725. We will reinforce the existence of these requirements with the permit writers.

Round 2 Evaluation: Ecology's ERO reported that they have been receiving the permittee's suggested changes with minor permit modification applications. Ecology's IS reported they are following the minor permit procedures. Region 10 discussed this topic with Ecology staff during an on-site meeting. Ecology staff believes they are following their rules when minor permit revisions are processed. No examples of inappropriate procedures were identified, so this concern is not considered an ongoing issue. Ecology's NWP developed a guidance document called the AOP Change Determination Key to ensure minor permit modifications follow applicable requirements and certifications. See I-2 for more discussion about that document. See Attachment 2 (Item 3.d) for Ecology's actual responses to this concern.

E-2 2006 EPA Concern: Ecology's permits contain general testing requirements that include the ability to have alternative test methods or monitoring methods approved by Ecology. Significant changes to test methods or monitoring methods in Title V permits can be made only through the significant permit revision procedure. In addition, Ecology cannot approve an alternative to the test method that is approved as part of the state implementation plan. See 40 CFR 51.212. Ecology should appropriately limit the authority to approve alternative test methods and monitoring methods in future permits.

2006 Ecology Response: You stated that we should appropriately limit the authority to approve alternative test methods and monitoring methods in future permits. We agree that this is a potential concern, but we are unclear of the scope of this problem in our

permitting program and will further investigate. If this is an issue that turns out to be more than an occasional oversight we will arrange for training for the Title V permit writing staff.

Round 2 Evaluation: While some permits still include the general option of getting an alternative test method approved without a permit modification (which is appropriate for only certain test method changes), Region 10 has seen no evidence of Ecology inappropriately approving alternative test methods. Region 10 does not consider this an ongoing concern.

Section F. Compliance

F-1 2006 EPA Concern: One Ecology office does not verify that the source is in compliance before a permit is issued. Title V requires a compliance schedule be created and added to the permit if a source is out of compliance at the time of permit issuance. Given their experience and familiarity with their assigned sources, Ecology permit writers should be able to easily verify compliance before permit issuance. Ecology should always confirm the need for a compliance schedule prior to permit issuance.

2006 Ecology Response: You indicated that one Ecology office does not verify that the source is in compliance before a permit is issued. This appears to be a past performance issue; currently each of our permits contains a compliance schedule, which includes ongoing submittal of compliance certifications.

Round 2 Evaluation: Region 10 has no indication that existing compliance issues are not being adequately addressed with compliance schedules when issuing permits. Ecology seems to fully understand the need to confirm compliance before permit issuance. Region 10 does not consider this an ongoing concern.

F-2 2006 EPA Concern: Based on the questionnaire response and interview, Ecology offices treat deviations and excess emissions differently. Inconsistent implementation of Title V permits can lead to enforcement difficulties. Ecology noted during the on-site interview that any such inconsistency has not yet been raised as an issue by permittees or the public. Regardless, Ecology should consistently interpret and enforce their Title V program in the future.

2006 Ecology Response: You identified that Ecology offices treat deviations and excess emissions differently. We acknowledge that this inconsistency could potentially give rise to enforceability issues, and agree that we need to make an effort toward statewide consistency. We will review this issue internally with the permit writers and evaluate the need for further guidance.

Round 2 Evaluation: Region 10 is not aware that differences in how each office treats deviations have caused enforcement complications. Ecology has indicated an understanding of this issue, whether or not their office treat deviations differently. Each office explained how they document their follow-up to deviation reports. Absent specific incidents, Region 10 acknowledges that Ecology understands the advantages of

consistent enforcement programs between their offices. Region 10 does not consider this an ongoing concern.

F-3 2006 EPA Concern: Like many permitting authorities, Ecology requires corrective actions when certain monitored parameters are outside of the acceptable range. This is a practical approach for assuring potential operational problems are addressed promptly. When using this approach, Ecology should clarify when a deviation occurs (when the unit is outside the range or if corrective action is not taken), such that the appropriate records are created and reported. Furthermore, Ecology should add recordkeeping so each event of operation outside the acceptable range is documented, even if it is not required to be reported as a deviation.

2006 Ecology Response: You indicated that when we allow for corrective actions when monitored parameters are outside of the acceptable range, we should clarify when a deviation occurs and require that the appropriate records are created and reported. Along with Concern #2 in this section, we acknowledge this issue and agree there should be consistency in documenting deviations and appropriate recordkeeping requirements. We will discuss this issue internally with the permit writers and evaluate the need for further guidance.

Round 2 Evaluation: The permits Region 10 reviewed indicate that Ecology has clarified when deviations should be reported for many of the standard monitoring regimens. While there may be other conditions in permits where it is not clear when a deviation has occurred, Ecology added a general recordkeeping requirement which requires all of the monitoring records and results be kept. This is a good catch-all recordkeeping requirement. To the extent possible, Ecology should continue to ensure that their expectations for deviation reporting are clear.

Section G. Resources and Internal Management Support

G-1 2006 EPA Concern: The U.S. Department of Energy pays for one FTE to assist in environmental oversight of the Hanford facility. It is not clear whether the position(s) funded by this FTE performs Title V work; however, this revenue is not tracked as a Title V fee or other revenue. Ecology should confirm they are accounting for all Title V revenues and expenses and keeping these revenues and expenses separate from non-Title V accounts.

2006 Ecology Response: You recommended that Ecology confirm that we are accounting for all Title V revenues and expenses, and specifically questioned Hanford permit management. We will follow up with both the Department of Health and our Hanford site on this issue. We need to verify the authority under which this FTE is funded and make sure our Title V revenues and expenditures are appropriately tracked with regard to this position.

Round 2 Evaluation: Ecology appears to have adequate tracking of their Title V expenses and to keep their revenues and expenses for Title V separate from other accounts. The billing system between Health and Ecology seems to work. In general,

Ecology is able to ensure adequate funding for their Title V program and are not experiencing a permit production issue that can be linked to resources.

Section I. Document Review (Rules/Forms/Guidance)

I-1 2006 EPA Concern: Title V and Ecology's operating permit regulation specify the elements that must be contained in the permit application form. Ecology should compare the form to the regulation to be sure that the form meets their regulations and Title V.

2006 Ecology Response: You stated that our Title V application is missing required elements. The application form was recently updated but we will double check it to make sure it meets the requirements of the regulation.

Round 2 Evaluation: Region 10 reviewed the latest version of Ecology's permit application. The current permit application appears to include the contents required by Ecology's regulation and Part 70. This concern is considered resolved.

I-2 2006 EPA Concern: One Ecology office created a draft document titled "AOP Change Determination Key." The document provides guidance on revising permits. While the concept of the document is a good idea, Ecology should review the document for consistency with their permit revisions regulations and revise it accordingly before it is released to the public.

2006 Ecology Response: You noted that one Ecology office created a draft document titled "AOP Change Determination Key" and advised that it be reviewed for consistency with our permit revisions regulations. This issue relates to a document used by the Hanford site only. We will notify staff there and ask them to review this document and correct it.

Round 2 Evaluation: In response to Region 10's request for an update on this concern, Ecology sent the latest version of the AOP Change Determination Key document to the state region who reviewed the document and briefly discussed it during an on-site meeting. The fact that the document is only used by Ecology's NWP limits the impact of possible errors in the document; however, there are some obvious revisions that should be made to the document to be consistent with the regulations and Act. In the two sections of the document that discuss the off-permit changes that can occur at a facility (e.g. changes not requiring a permit revision and off-permit changes), it seems to imply that the changes are made to the permit. These type changes are plant changes that do not require any change to the permit. In fact, any changes to the permit that are necessary as a result of a plant change must be processed as an administrative amendment, a minor revision or a significant revision. This document should be revised to be consistent with the regulations. It might also be a good idea to have the revised document peer reviewed by other Ecology offices.

III. Additional Review

In addition to reviewing concerns identified in the first review, Region 10 requested an update about program resources and permit issuance progress and reviewed three permits that were issued by Ecology within the last four years. The focus of the permit reviews was generally on previously identified concerns and specifically on compliance assurance monitoring requirements. Conclusions regarding past concerns have been documented in Section II of this report, specific to each concern. Concerns regarding CAM or any new concerns identified during the permit reviews are documented in this section.

The permits reviewed include:

<u>Permit No.</u>	<u>Company Name (Location)</u>	<u>Date Issued</u>
0000256	Georgia Pacific – Camas, WA	June 25, 2014
13AQ-C181	SDS Lumber Company – Bingen, WA	September 30, 2013
08AQ-E252	Boise Building Solutions – Kettle Falls, WA	January 12, 2010

Compliance Assurance Monitoring Background

CAM has been a particular focus for Region 10's oversight work this year for several reasons. CAM is required to be applied in the initial permit for sources with "large" pollutant-specific emission units and in the first renewal for all other sources. Most pollutant-specific emission units are not large, so CAM has been primarily implemented during the renewal phase of the Title V program. Region 10 had a rigorous permit oversight program in the early years of Title V. By the time state and local agencies were issuing renewal permits, Region 10 had scaled back its oversight program substantially and, in fact, reviewed very few permits that addressed CAM.

Beginning in fiscal year 2013, Region 10 began to review a small percentage of state/local renewal permits to see how CAM was being addressed. A consistent lack of documentation regarding CAM applicability and monitoring decisions in SoBs was uncovered. Logically, Region 10 decided to specifically review how CAM was being addressed in the permits being reviewed as part of this program review.

CAM, found in 40 CFR Part 64, 173-401-615(4) in Ecology's rules, applies to pollutant-specific emission units at major Title V facilities. CAM applicability is based on three factors:

1. The pollutant-specific emission unit must be subject to an emission limitation or standard;
2. The pollutant-specific emission unit must utilize a control device to achieve compliance with the standard; and
3. Pre-control PTE from the pollutant-specific emission unit (on a PTE basis not counting controls) must be greater than the major source threshold for that pollutant.

Compliance Assurance Monitoring Comments

1. CAM applicability to each emission unit in a facility should be fully documented in the SoB. Documentation was incomplete in all SoBs for reasons explained in the following comments.

2. CAM applicability should address whether the source is a major source; minor sources are not subject to CAM. When documenting PTE, Ecology should be sure to include fugitive emissions when required.
3. CAM applicability should address the applicability factors listed above.
 - a. Some SoBs did not identify all of the emission units with controls.
 - b. Some SoBs did not include all of the applicable requirements (e.g. general opacity and particulate limits).
 - c. Some SoBs did not include PTE (e.g. controlled and uncontrolled by emission unit).
4. CAM applicability should address whether the applicable requirement is exempt from CAM.
 - a. Acid rain applicable requirements are exempt from CAM; however, pollutant-specific emission units subject to acid rain regulations as well as other applicable requirements may still be subject to CAM for the other requirements because CAM applies on a requirement-specific basis.
 - b. Pollutant-specific emission units with continuous emission monitoring systems are exempt only if the continuous emission monitoring system is a continuous compliance determination method. That is the case for only a handful of NSPS requirements. Continuous emission monitoring systems required in permits often include rigorous quality assurance requirements but are not necessarily the compliance determination method. Ecology should confirm and document which continuous emission monitoring systems are in fact required by permit or rule to be the compliance determination method, rather than just a compliance indicator.
 - c. NSPS and NESHAP proposed after November 15, 1990, are exempt from CAM. Where this exemption is being applied, the date of the NSPS/NESHAP should be documented. Ecology could accomplish this by ensuring each SoB includes an applicability discussion for all potentially applicable NSPS/NESHAP.
5. CAM applicability should address whether the post-control emissions make the unit a large pollutant-specific emission unit. Whether a pollutant-specific emission unit is large dictates the timing for application of CAM and the frequency of monitoring in a CAM plan.
6. Documentation of CAM decisions should be explained in SoBs. Attaching the submitted CAM plan is a good way to document the analysis details, assuming the agency agrees with that analysis.
7. Permits should include the CAM thresholds which define excursions and exceedances for each pollutant-specific emission unit subject to CAM. Some permits included thresholds for some CAM parameters; others did not.
8. Documentation of the CAM applicability analysis, if done thoroughly, should help ensure all pollutant-specific emission units have been considered and all pollutant-specific emission units subject to CAM have been addressed in the permit.

Additional Comments

1. Ecology appears to manage their operating permit resources very well. By projecting the program workload each year and balancing the amount of fees collected with built-in fee adjustments, Ecology can readily address shortfalls or excess carryover. For the past several years, they have collected more fees than they have needed.

2. Three of the four offices of Ecology that issue operating permits have small permit backlogs. According to the most recent TOPS report to EPA, seven of the 12 permits issued by the Eastern Regional Office have been administratively extended awaiting renewal. This backlog developed primarily during the last two years. With the recent replacement of an experienced permit writer that retired, Ecology hopes to issue the backlogged permits within the next 12-18 months.
3. While not all permits reviewed included MACT standards, in one case the permit simply incorporated by reference one aspect of the applicable MACT standard rather than write the specifics into the permit. Those requirements should be clearly spelled out in the permit, so a reader does not have to go to a Code of Federal Regulation to learn what is required. In another place in the same permit, Ecology referenced emission testing procedures in a MACT standard as a part of a gap-filling requirement that was added to the permit. Even in that situation, the permit needs to include the details. In the same permit, MACT control device monitoring parameters were set by testing that was completed well ahead of permit issuance, but were not incorporated into the permit, but should have been. While these may be isolated issues, we thought it was important enough to include it in this report.
4. One permit with long term limits (ton/year) listed a test method as the compliance technique. For long term limits, the compliance method needs to clarify how test data will be coupled with production data to calculate emissions over the duration of the reporting period. If the limit is a synthetic minor limit used to avoid major source status, the emission factors must be in the permit. Again, this may not be a wide-spread issue, but this is an important permitting concept.
5. In more than one permit, multiple compliance methods were listed along with the monitoring requirements. It was not always clear which method was the compliance determination method. There should only be one compliance determination method. All other methods are only used to indicate compliance or as credible evidence.
6. Some permits had volatile organic compound emission limits but did not always specify the basis for the VOC value (e.g. carbon, propane, actual organic constituents, etc). To be enforceable, the limits, as well as the compliance method, should clarify the VOC basis.

IV. Summary of Concerns and Recommendations

Concerns

Most of the concerns identified in the first-round program review have been resolved, but some still need attention. Region 10 has identified a few significant concerns as well as several places where Ecology can still improve their program. The concerns identified by this report are summarized below under three themes: several items that Ecology would do well to improve, two items that absolutely need to improve and one thing that deserves special attention to resolve.

Ecology has made some improvements to their permits, but more improvements are still needed. Region 10 is satisfied with Ecology's responses to 10 of the 17 concerns identified in the first program review. Ecology formed a workgroup to develop guidance, but the workgroup didn't seem to accomplish its goal. The SoB outline was the only result of the workgroup, but that document doesn't really provide enough of the details needed to ensure that permit writers are consistently writing good permits and SoB. Creating comprehensive internal guidance would likely resolve many of the areas in which Ecology can still improve and most of the more significant concerns. Concerns identified by Region 10 in the 2006 program review in which Ecology can still improve include documenting permit shields (A.3), clarifying paraphrased applicable requirements (A.4) and state-only conditions (A.5), utilizing O&M manuals more effectively (A.7) and defining deviations (F.3). New areas of concern that Ecology could easily address include incorporation of MACT standards into permits, clarifying the compliance determination methods for all applicable requirements including long-term emission limits and clarifying VOC limits and test methods (Additional Comments 3, 5, 4 and 6, respectively).

Two issues identified in 2006 are still big concerns that must be addressed. Every statement of basis reviewed had at least some important issues (A.1), and one of those important issues is CAM (C.1 and CAM Comments in the Additional Review section of the report). Region 10 is particularly concerned about these issues not only because they are important elements of the operating permit program, but also because both of the issues were raised in 2006, discussed in 2008, noted in Ecology's own internal audit in 2010 and still exist today. There are a number of guidance documents available to help Ecology master these elements of the operating permit program.

Region 10 is concerned about permit issuance rates. Ecology's backlog of unissued renewal permits in the Eastern Regional Office has grown significantly over the last few years. While Ecology appears to have a plan in place to reduce the backlog over the next 12 to 18 months, permit backlogs automatically draw attention. We recommend that Ecology devote adequate resources to address the backlog in the Eastern Regional Office.

Recommendations

In general, Ecology should provide to Region 10 a response that explains what they plan to do to resolve all of the concerns identified in this program review. Between the previous report and the on-site interview during this second-round review, Ecology should be familiar enough with these issues to respond within 45 days of receiving the final report. If Ecology prefers to discuss the concerns before responding, Region 10 can accommodate that.

Specifically, Ecology should consider developing comprehensive internal permit and SoB guidance to resolve the two significant issues flagged in this program review; such guidance will also improve Ecology's performance on the less significant issues.

Ecology should also pay particular attention to the backlog of renewal permits in the Eastern Regional Office. Given that Ecology has experienced permit writers in the other Ecology offices and little to no backlog in those offices, Ecology could leverage extra assistance from those offices and strive to reduce the backlog in the Eastern Region.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101**

AUG 04 2014

Mr. Stuart Clark
Air Quality Program Manager
Washington State Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Dear Mr. Clark:

Consistent with conversation between our agencies, this letter is to notify you that the U.S. Environmental Protection Agency (EPA) Region 10 plans to perform a second review of the Washington State Department of Ecology's (WDOE) Title V operating permit program. This letter kicks off the effort by describing the review process and our proposed schedule. We are also requesting information to assist us in our program review. Your agency will be the fourth of six second-round program reviews that EPA Region 10 has undertaken.

This program review will focus primarily on the following four areas: (1) follow-up to concerns identified during our 2006 review of your program; (2) permit issuance progress and resources; (3) compliance assurance monitoring; and (4) new applicable requirements and rules. A small selection of recently-issued permits will be reviewed. Note that this program review may require involvement of staff and managers from your permitting, technical, finance and compliance groups. It would be very helpful if a single person from your agency is assigned to coordinate the participation of each of your groups that are involved with Title V. Our tentative schedule is as follows:

Task	Date
EPA sends kickoff letter with request	Today
WDOE sends requested information	August 20, 2014
EPA visits WDOE (two partial days)	September 3-4, 2014
EPA sends final report	September 30, 2014

The enclosure describes the information we would like to receive in advance so we can be as efficient as possible during the interviews. Please return the information (preferably in electronic form) as early as you can, but no later than the date in the table above, to Doug Hardesty (hardesty.doug@epa.gov) who will be leading the review for EPA. Note that we began a review of your program in 2008, but canceled it before completion. We have included some of the information previously submitted to us in 2008 with this letter, so you can decide whether or not that information can simply be updated for this review. We

will contact the point of contact who you identify if we need any additional information or have questions.

My staff will come to your office to conduct the interviews. An agenda will be sent in advance of our arrival. During the interviews, we may want to talk to a number of your staff and managers, so we hope you will agree to make them available as needed. As described in the schedule, we plan to complete our report by the end of September.

We look forward to working with you and your staff. If you have any questions about the program review, please do not hesitate to call me at 206/553-1271 or Doug, in our Boise office, at 208/378-5759.

Sincerely,



Kate Kelly, Director
Office of Air, Waste and Toxics

Enclosure

cc: Laurie Davies,
Waste 2 Resources Program Manager

Title V Program Review – Round 2 Washington Department of Ecology

Information Request

Please send the following information in electronic form to Doug Hardesty (hardesty.doug@epa.gov) as soon as it is available, but no later than August 27, 2014. Your November 2008 responses to items #1, #2 and #3 have been included, so you can simply update that information as necessary.

- 1. A list and description of any rule changes that have been made to the WDOE’s Title V regulations (e.g. those that affect applicability, implementation, or fees) since September 2002. If any of the rule changes have been submitted to the EPA for review, note the date of submittal.**

WDOE in November 2008: No rule changes have been made to the Operating Permit Regulations contained in Chapter 173-401 WAC since those submitted to EPA September 16, 2002. The Program Development Section (Rules Unit) is seeking authorization from senior management to open Chapter 173-400 WAC in spring 2009. With this rule revision, Ecology intends to address concerns with WAC 173-400-107 Excess Emissions, which will effect implementation at Washington’s Title V sources. In addition, Chapter 173-401 WAC is on the rulemaking docket. If senior management approves proceeding with rulemaking, the rule revision effort would likely begin once the rule revision process for Chapter 173-400 WAC is completed in spring 2010. The scope or specific changes of this future rulemaking have not been decided.

WDOE in August 2014: Changes were made to Chapter 173-401 WAC to incorporate Tailoring Rule provisions (effective 1/1/11) and Biomass Deferral (effective 9/10/11). Notification of both changes were sent to EPA for Program Approval February 11, 2011 and December 16, 2011, respectively.

Ecology has begun rulemaking (5/7/14) to make substantive changes to Chapter 173-401 WAC.

- 2. A narrative describing the WDOE’s progress in organizing an internal group to create a boilerplate outline or guidance document to address statement of basis content (2006 Concern A.1) including:**
 - a. Documentation of permit shields (2006 Concern A.3);**
 - b. Clarification of state-only requirements (2006 Concern A.5);**
 - c. Documentation of CAM applicability and decisions (2006 Concern C.1); and**
 - d. Regarding the internal group concept, include whether you formed an internal group, the group participants; how often the group meets; any guidance produced by the group.**

WDOE in November 2008: On May 17, 2007 and June 12, 2007, Ecology representatives from the Regional Offices, the Nuclear Waste Program and Industrial Section met to discuss creation of an agency boilerplate outline or guidance document to address EPA’s concerns with the content of Ecology’s Statement of Basis. Staff from each office/program committed to putting together an outline or template of how they wanted the SOB guidance to look. However, before a follow-up meeting was scheduled, other program priorities caused staff to set aside work to develop such a guidance document.

In August 2008, this effort resumed. The following leads were identified to participate and coordinate comments from other program staff – Lynnette Haller from Ecology’s Central Regional Office, David

Wendland from Ecology's Eastern Regional Office (ERO), Merley McCall from the Solid Waste and Financial Assistance Program's Industrial Section (IND), and Doug Hendrickson from Ecology's Nuclear Waste Program (NWP). Each lead was asked to share any drafts they had started to develop in 2007 (see attached) and propose what type of format their group would prefer for the guidance document.

Staff requested an outline format be used with hyperlinks to guidance information. A draft outline was circulated September 29, 2008 (attached). The outline was developed to address comments from EPA's Program Review in 2006. It was formatted to incorporate style, organization and layouts found in a sample EPA Part 71 statement of basis and existing Ecology statements of basis.

Preliminary comments received from one program office recommended changing the outline format to a checklist. It was suggested that this checklist would be used by Title V permit writers to verify (or "check off") all required information was included or at least considered during the review of the permit. Comments received from the other programs continued to favor the outline format. In addition, there were concerns about giving up formatting freedom in favor of a uniform-looking document. A teleconference to discuss these conflicting formats is being scheduled to discuss what next steps should be taken.

With respect to concerns about missing MACT requirements and identification of other applicable federal requirements, staff recommended that the program develop a quick reference guide for staff to use to insure due diligence when determining applicability of MACT/NSPS/NESHAPs (Section 111 or 112 standards). This quick reference guide would include a listing of equipment and applicable requirements such that there could be a more thorough consideration of particular standards for inclusion in Title V permits. This project requires extensive staff time to develop and has not yet been started.

While Ecology's workgroup may not have completed this assignment, working on this project for more than the last year has kept EPA's concerns in the thoughts of Ecology's permit writers, no doubt influencing the content of both the draft permits and statements of basis.

A copy of the outline circulated and interagency written communications are attached.

WDOE in August 2014: The SofB outline/template was finalized and has been used by permit writers in Industrial Section when renewing permits. In addition, Ecology's AOP coordinator has reviewed and commented on draft SofB content during permit renewal cycles to help Industrial Section implement the template into their permit process.

3. A narrative describing the WDOE's progress in addressing:

- a. Missing MACT requirements (2006 Concern A.2);**
- b. Clarification of paraphrased applicable requirements (2006 Concern A.4);**
- c. Inclusion of O&M plan components (2006 Concern A.6);**
- d. Minor permit modification procedures (2006 Concern E.1);**
- e. Permit authority to revise monitoring or testing methods (2006 Concern E.2);**
- f. Treatment of deviations and excess emissions (2006 Concern F.2); and**
- g. Defining and documenting deviations (2006 Concern F.3).**

WDOE in November 2008: See #2 above. Also, note individual regional office or program comments (below).

Eastern Regional Office

- a. ERO only has one MACT source – Boise Cascade Plywood. Plywood MACT requirements are being incorporated in their draft renewal permit.
- b. ERO is including the following language following the introduction to the applicable requirements section *“The column entitled **Description** in each table contains abbreviated and/or paraphrased versions of the applicable conditions, emission limitations or work practices. The cited condition, emission standard or work practice is the enforceable requirement. Any perceived discrepancies between the description and an underlying applicable requirement will be resolved by reference to the cited applicable requirement.”*
- c. Ecology does not intend to require incorporation of O&M plans into Title V permits.
- d. The requests that David Wendland at ERO has processed contain the permittee’s suggested changes to the permit and certification by a responsible official that the proposed change meets the minor permit modification criteria.
- e. ERO has used language requiring any change in test methods to be approved in advance, but nothing more specific.
- f. ERO believes that clarifying the provisions in Chapter 173-400-107 WAC would help staff treat deviations and excess emissions in a more consistent manner statewide. However, Ecology has not decided on specific changes or scope of any future rulemaking with respect to this section.
- g. ERO has been reviewing and making compliance determinations on all monthly deviation and excess emission reports submitted by sources. Each compliance determination decision is documented in writing to the source and for the agency files.

Nuclear Waste Program

- a. No applicable MACTs were identified and none are missing from US Dept of Energy Hanford permit.
- b. NWP has addressed this in the US Dept of Energy Hanford permit in the section containing Standard Terms and General Conditions.
- c. Ecology does not intend to require incorporation of O&M plans into Title V permits. In addition, PCHB 07-012 upheld that identifying the O&M plan as an applicable requirement was appropriate, but that Ecology should not include the details of the O&M plan into the Title V permit.
- d. NWP uses the AOP Change Determination Key (see #6) to insure minor permit modifications follow applicable requirements and certifications.
- e. NWP has not altered monitoring or testing requirements without considering such modification with respect to significant modifications. The last such proposed monitoring alternative was denied to the permittee.
- f. NWP responds to each deviation and excess emission report with consideration of remediation and enforcement.
- g. NWP completes an assessment report for any deviation or excess emission reported. This report details the basis for a finding of deviation from standards and a determination whether such deviation or excess emission was excusable. Enforcement actions are initiated when recommended by these reports.

Industrial Section

- a. Future Industrial Section permits and statements of basis will more clearly and consistently address NESHAPs requirements.
- b. Industrial Section needs further explanation of EPA’s concern regarding use of paraphrases in the permit.
- c. Ecology does not intend to require incorporation of O&M plans into Title V permits.
- d. Industrial Section is following minor permit modification procedures.
- e. Industrial Section notes that Ecology has limited authority to revise monitoring or testing methods, language will be clarified when permits are renewed.

4. Financial records (preferably from your last complete fiscal year) reflecting revenues and expenses that document the WDOE’s ability to fund the operating permit program with Title V

fees and the WDOE's ability to ensure that Title V fees are used only for Title V authorized expenses.

WDOE in August 2014: The Annual Report for 2013 is attached. Annual reports re: the financial reconciliation at the end of a fiscal year cannot be completed until after mid-September, when the end-of-year closing is completed, therefore the Annual Report for 2014 is not available at this time.

- 5. The most recent Air Operating Permit Annual Report if not available on the WDOE's website (the latest online is FY 2012), and the most recent internal Performance Audit if not available on the WDOE's website (the latest online is 2010).**

WDOE in August 2014: The Annual report for 2013 is attached. The most recent internal Performance audit is 2010 – the one available on the agency website.

- 6. Any issues or requests that WDOE would like to raise to the EPA regarding any aspect of the Title V program?**

WDOE in August 2014: No.

Ecology Statement of Basis Outline

Cover Page (Use new logo)

Source Information

AOP Permit No.

Source Name

County

Issued date

Effective date

Expiration date

AFS Plant ID number

Permitting Authority Information

Preparer

Ecology Program/Region

Address

Phone

Fax

Table of Contents

[1.0 Introduction](#)

[2.0 Permit Authority](#)

[3.0 Facility Information](#)

Company history and information

Ownership

Responsible official

Contacts

Location

AFS Code

Attainment classification

Basis for T5 applicability

[4.0 Source Description](#)

Process description

Process flow diagram(s)

Plant schematic identifying all emission units and associated control devices

Summary of potential emissions (tpy)

Criteria Pollutants

HAPs (major/area/minor)

Federal Air Quality Requirements (applicability for MACT, NSPS, NESHAP, or CAM)

State Air Quality Requirements (applicability for BACT, PSD, LAER, or Acid Rain)

Compliance/Enforcement history and remedies

[5.0 Emission Unit Description](#)

Control Device

Emission Inventory ID (point & segment)

Construction/modification/permit history

Applicable requirements

Identification of state-only vs federally enforceable requirements

Emission limit discussion

Monitoring requirements (how monitoring assures continuous compliance, discussion of gap filling)

For CAM applicable units
Monitoring requirements
Streamlining

[6.0 Insignificant Emission Unit\(s\)](#)

[7.0 Operational Flexibility](#)

[8.0 Permit Shield](#)

[9.0 Public Participation](#)

Public Notice

Comments, responses and any resulting changes

[10.0 List of Abbreviations and Acronyms](#)

[11.0 Attachments](#)

1.0 Introduction

This document, the statement of basis, summaries the legal and factual basis for the permit conditions in the air quality operating permit issued by the Washington State Department of Ecology to the source. Unlike the air quality operating permit, this document is not legally enforceable. This statement of basis summarizes the emitting processes at the facility, air emissions, permitting and compliance history, the statutory or regulatory provisions that relate to the facility, and the steps taken to provide opportunities for public review of the permit. The permittee is obligated to follow the terms of the permit. Any errors or omissions in the summaries provided here do not excuse the permittee from the requirements of the permit.

2.0 Permit Authority

Title V of the Federal Clean Air Act Amendments required all states to develop a renewable operating permit program for industrial and commercial sources of air pollution. The Washington State Clean Air Act (RCW 70.94 Revised Code of Washington) was amended in 1991 and 1993 to provide the Department of Ecology and Local Air Agencies with the necessary authority to implement a state-wide operating permit program. The law requires all sources emitting one hundred tons or more per year of a criteria pollutant, ten tons of a hazardous air pollutant, or twenty-five tons in the cumulative of hazardous air pollutants, to obtain an operating permit. Criteria pollutants include sulfur dioxide, nitrogen oxides, particulate matter, carbon monoxide, and volatile organic compounds.

Chapter 173-401 of the Washington Administrative Code (WAC), which specified the requirements of Washington State's Operating Permit Regulation became effective November 4, 1993. United States Environmental Protection Agency (EPA) granted Washington's program interim approval December 9, 1994. Final approval of Washington's program was granted on August 13, 2001. The current version of the regulation was filed on August 10, 2011.

3.0 Facility Information

This section should include a brief description and history of the company, including ownership, responsible official(s), contact(s), location, attainment classification, AFS identification, Basis for Title V applicability, etc.

4.0 Source Description

This section should include a detailed process description, supported by process flow diagram(s) and identification of emission units and control devices on a plant schematic (can refer to an attachment in Section 11.0 if not included here).

In addition, it should include a summary of potential emissions, in tons per year, including both criteria pollutants and HAPs. Any federal air quality requirements should be discussed, including applicability/non-applicability decisions for any MACT, NSPS, or NESHAP subparts that might appear to be applicable. Decisions made with regard to CAM should be discussed and all applicable CAM emission units should be identified. Any state air quality requirements should be discussed, including applicability decisions with respect to PSD, BACT, LAER and Acid Rain.

Finally, this section should discuss the compliance history at the facility, including a discussion of enforcement activities and associated remedies at the facility.

5.0 Emission Unit Description

Each emission unit and any associated control equipment should be listed with associated emission inventory identification numbers (point and segment number) and a history of construction, modification and permitting should be discussed.

Each unit's applicable requirements, including emission limits, associated monitoring and operational restrictions should be discussed. State-only versus federally enforceable requirements should be clarified with an explanation as to why the requirement is a state-only requirement. If the unit is CAM applicable, this section should include a description of CAM.

If the applicable requirement does not require periodic testing or monitoring, or any existing monitoring is not adequate to assure compliance with the applicable requirement, periodic testing or monitoring should be enhanced (gap filled). The rationale for the decision and the enhancements shall be discussed.

If emission limits are streamlined in the permit, a discussion of the basis for streamlining the requirements should be included.

6.0 Insignificant Emission Unit(s)

This section should list insignificant emission units identified by the source with enough detail to clarify the basis for their insignificance.

7.0 Operational Flexibility

Describe any operational flexibility requested by the source.

8.0 Permit Shield

Discuss permit shields for any requirements that have been determined to be not applicable and the basis for the shield. This should be limited to only those requirements that might reasonably apply and for which an inapplicability determination is both useful and appropriate to document.

9.0 Public Participation

Discuss how the permit was publicly noticed and available for public comment (such as publishing notice in daily or weekly newspaper, Washington Operating Permit Register website, etc). Discuss any comments received, Ecology's response to the comments and resulting changes to the permit (if any).

10.0 List of Abbreviations and Acronyms

Btu	British thermal units
CAA	Clean Air Act [42 U.S.C. section 7401 et seq.]
CAM	Compliance assurance monitoring

CEMS	Continuous emission monitoring system
CFR	Code of Federal Regulations
CO	Carbon monoxide
COMS	Continuous opacity monitoring system
CO ₂	Carbon dioxide
dscf	Dry standard cubic feet
Ecology	Washington State Department of Ecology
EPA	United States Environmental Protection Agency
EU	Emission unit
gr/dscf	Grains/dry standard cubic foot (7,000 grains = 1 pound)
HAP	Hazardous air pollutant
hr	Hour
IEU	Insignificant emission unit
lb	Pound
MACT	Maximum Achievable Control Technology
mm	One million
NESHAP	National Emission Standards for Hazardous Air Pollutants (40 CFR Parts 61 and 63)
NOC	Notice of Construction
NO _x	Oxides of nitrogen
NSPS	New source performance standards
O ₂	Oxygen
PM	Particulate matter
PM ₁₀	Particulate matter with an aerodynamic diameter equal to 10 microns or less
ppmdv	Parts per million, on a dry volume basis
PSD	Prevention of significant deterioration
PTE	Potential to emit
SCR	Selective catalytic reduction
SO ₂	Sulfur dioxide
SO _x	Oxides of sulfur
tpy	Tons per year
VOC	Volatile organic compound
WAC	Washington Administrative Code

11.0 Attachments

List those used to review permit.



DEPARTMENT OF
ECOLOGY
State of Washington

**Air Operating Permit Report
Fiscal Year 2013**

AOP Program Report
Fiscal Year 2013
October 14, 2013

Table of Contents

Introduction
Financial Summary
Pre-billing and Billing Statements
Explanation of Fee Collection and Late Payments
Explanation of Refunds and Rebates

Introduction

This report summarizes Air Operating Permit (AOP) program financial details and program tasks and activities for Fiscal Year (FY) 2013. The reporting period is July 1, 2012 through June 30, 2013.

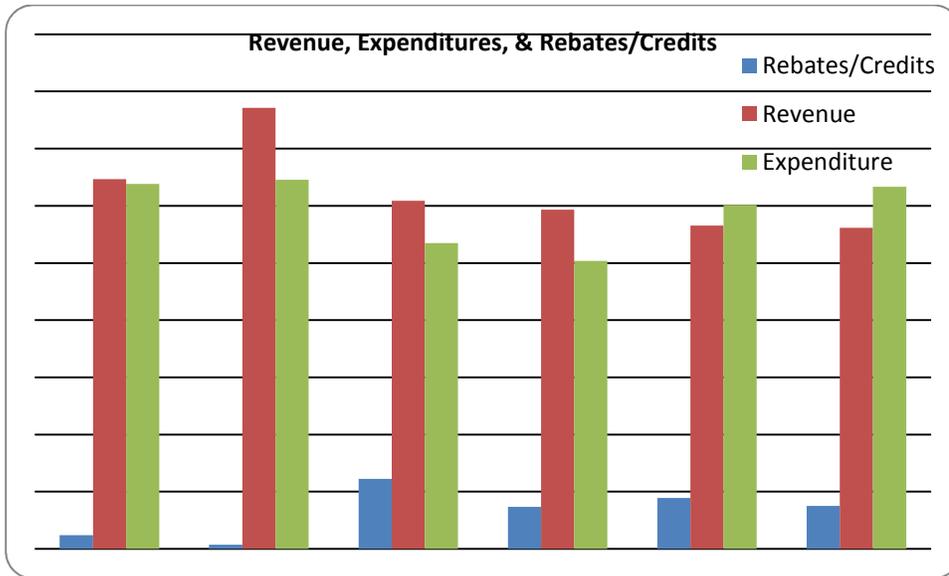
If you have questions about the information in this report, contact Crystal Rau at Crystal.Rau@ecy.wa.gov or at (509)329-3595.

Financial Summary

The budget is set using a workload analysis that identifies the costs associated with Ecology staff performing various AOP program tasks, such as permit writing and compliance verification. The budget for FY 2013 was set at \$1,273,038.49.

AOP tasks are broken into two categories: Ecology AOP program administration, which is paid for by Ecology AOP sources (only); and development and oversight (D&O) of the statewide AOP program, which is paid for by all AOP sources in Washington. AOP program administration budget for FY2013 was \$1,158,035.07. Statewide development and oversight budget for FY2013 was \$115,003.42.

The annual AOP program administration fees and D&O fees are set after any rebate from the prior fiscal year is subtracted from the annual budget. There was no rebate for FY2013 because the cost of the program exceeded the amount collected. However, to correct the positive variance in the Air Operating Permit Account (Fund 219), AQP subtracted \$150,000 off the budget to reduce the amount of the positive variance. This “credit” was apportioned to each Ecology AOP source or Local Clean Air Agency based on the percentage of the fee each paid the prior year compared to the total fees collected that year.



During the previous biennium (July 2011 through June 2013), an error was made in the Ecology source fee assignment for each fiscal year. These errors were corrected for the Ecology sources by calculating what each source should have paid for each fiscal year, adjusting the FY2013 fees, then “crediting” \$150,000 to Ecology sources and local clean air agency D&O fees.

Information on the AOP budget, rebates, amounts billed and fees collected for each year from FY 2008 through FY2013 is represented in the chart below. Discrepancies between the amount budgeted and collected are discussed in the specific AOP Annual Report for each fiscal year.

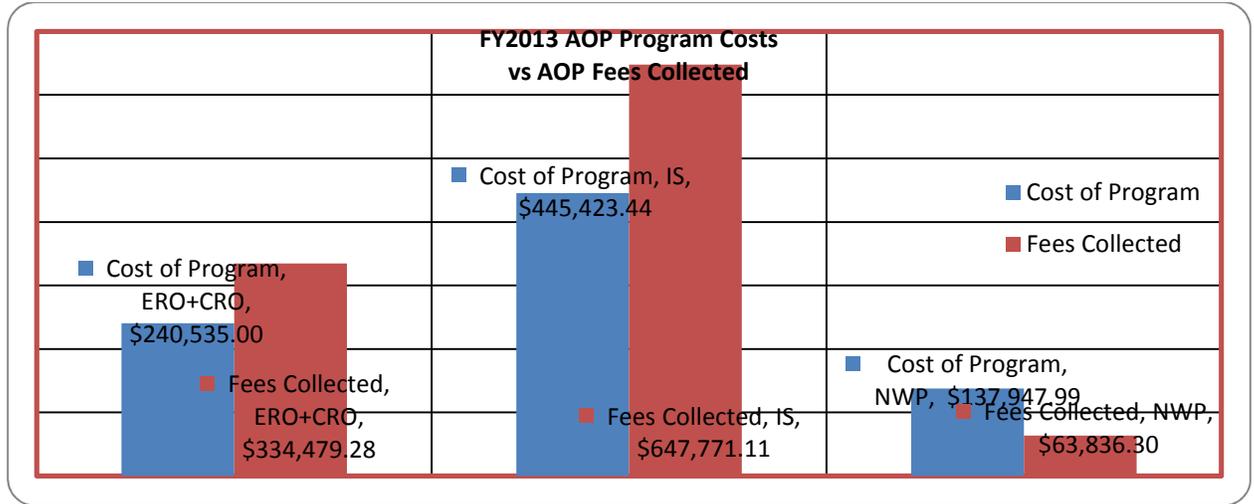
This year, we collected \$.12 less than the budget due to rounding of fractions of a cent in the fee calculations.

Ecology collected \$1,123,038.35 in AOP fees for FY2013. Ecology spent \$1,266,446.49 performing AOP related work in FY2013.

The amount collected from AOP sources is less than the cost of the AOP program, which means the “credit” applied against the Ecology AOP source fees resulted in reduction of the AOP fund balance. Since AOP fee revenue did not exceed AOP program expenditures in FY2013, there will be no rebates in the next billing cycle.

The chart below shows AOP program costs for Ecology’s Regional Offices, Nuclear Waste Program, and Industrial Section versus the total AOP fees collected from

sources in each program. Not included below are the costs associated with Air Quality Program work out of Ecology’s Headquarters office and overhead (Ecology administration, fiscal office, IT) charges. The methodology for how AOP fees are allocated to each source is set in regulation and statute. However, the formula is unsuccessful in allocating fees that more closely approximate the costs associated with the source.



The time accounting summary below shows the number of FTEs budgeted to perform various AOP tasks, the actual number of FTEs spent doing the work, and the difference for FY2013.

	Budgeted Total FTEs	Actual Total FTEs	Difference (Budgeted – Actual)
Industrial Section (IND)	3.61	3.234	0.376
Nuclear Waste Program (NUC)	1.216	1.88	(0.664)
Department of Health (DOH)	0.252	0.232	0.02
HQ – Science and Engineering Section (SES)	0.457	0.440	0.017
HQ – Technical Services Section (TSS)	1.120	1.270	(0.15)
HQ – Financial (FIN)	0.073	0.100	(0.027)
HQ – Program Manager (PM)	0.10	0.21	(0.11)
Eastern Regional Office (ERO)	1.724	2.005	(0.281)
Central Regional Office (CRO)	1.546	0.815	0.731
Totals	10.098	10.186	(0.088)

The table below shows some of the basic AOP activities budgeted and the actual work completed for FY2013.

	Activity	Budgeted Work	Actual Work Completed
Industrial Section (IS)	1. Permit Renewal	2	1
	2. Final Permit	3	1
	3. Permit Mod.	4	1
	4. Inspections	10	8

	5. Enforcement	13	8
Nuclear Waste Program (NWP)	1. Permit Renewal 2. Final Permit 3. Permit Mod. 4. Inspection 5. Enforcement	1 1 6 2 1	1 1 0 32 partials 0
Central Regional Office (CRO)	1. Permit Renewal 2. Final Permit 3. Permit Mod. 4. Inspections 5. Enforcement	3 3 4 5 1	0 ¹ 0 ¹ 2 ² 2 2
Eastern Regional Office (ERO)	1. Permit Renewal 2. Final Permit 3. Permit Mod. 4. Inspections 5. Enforcement	6 1 0 6 8	0 ³ 0 ³ 0 4 2

1. 1 significant permit modification was worked on, 3 renewals were worked on, none were finalized before the end of the year.
2. 2 administrative permit amendments were completed.
3. 6 renewals were worked on, none were finalized before the end of the year.

Pre-billing and Billing Statements

Ecology sent pre-billing statements for D&O fees to each local air agency by October 24, 2012. Pre-billing statements for AOP fees were sent to Ecology AOP sources by November 1, 2012.

Ecology sent final billing invoices to Ecology AOP sources January 2, 2013, with payment due by February 28, 2013. Ecology sent invoices for D&O fees to each local air agency on January 2, 2013, and April 1, 2013. Payments were due March 31, 2013, and June 30, 2013, respectively.

Explanation of Fee Collections/Late Payments

All AOP and D&O fees were collected by the end of the fiscal year. Only one AOP source did not pay its fee by February 28, 2013. Goldendale Generating Station's fee was received and posted March 2, 2013.

Explanation of Refunds, Rebates and Credits

Ecology did not issue any refunds in FY2013. In addition, Ecology did not issue any rebates, as AOP program expenditures in FY2012 exceeded revenue. However, to correct the positive variance in the Air Operating Permit Account (Fund 219), AQP

“credited” AOP sources and local clean air agency D&O fees based on the percentage of the fee each paid in FY2012 compared to the total fees collected that year.

Explanation of Changes to Address Fee Errors Found During Fiscal Audit FY2010 and FY2011

During the fiscal audit of Ecology’s AOP program in the spring of 2012, the State Auditor’s Office found that the fees assessed to each Ecology AOP source were calculated incorrectly due to data input errors in both FY2010 and FY2011.

To correct these errors, the Auditor recommended that Ecology correct these past billings by crediting those that overpaid and collecting from those that underpaid. The FY2013 fees for each Ecology AOP source were adjusted accordingly. This did not change the overall total fees collected, but simply reassigned the fees to the appropriate sources.

ERROR: undefined
OFFENDING COMMAND: get

STACK:

/quit
-dictionary-
-mark-

>Followup																			
>Interagency Agree																			
Federal Prog. Delegation																			
>Prog. Deleg. Package																			
>Followup																			
Interagency Agreement																			
>Emiss. Inventory Update																			
Engineering Support																			
Engineering Development																			
Total		0.00	0.00	0.0000	0.0000										\$0.00	\$0.00	\$0.00		\$0.00

C. Permit Processing

Activity	Position #	Hours	Tasks/Yr	Tasks/Yr	Hours	Hours	FTE	FTE	FY14 Salary & Benefits	FY15 Salary & Benefits	FY14 Indirect Cost	FY15 Indirect Cost	FY14 Goods/Serv. & Travel	FY15 Goods/Serv. & Travel	Cost FY14	Cost FY15	Biennial Total	FY14 D&O	FY15 D&O
Permit Application Review																			
Preapplication Assistance																			
Permit Renewals																			
Major Sources - Other																			
Non-Major Sources																			
Prepare Draft Permit																			
Public Meetings																			
Final Permits/Comments																			
Permit Modifications																			
Significant																			
Minor																			
Admin. Permit Amend.																			
Permit Reopening																			
Early Reduction Reviews																			
Operational Flex. Reviews																			
Permit Appeals																			
Total		0.00	0.00	0.0000	0.0000										\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

D. Permit Management

Activity	Position #	Hours	Tasks/Yr	Tasks/Yr	Hours	Hours	FTE	FTE	FY14 Salary & Benefits	FY15 Salary & Benefits	FY14 Indirect Cost	FY15 Indirect Cost	FY14 Goods/Serv. & Travel	FY15 Goods/Serv. & Travel	Cost FY14	Cost FY15	Biennial Total	FY14 D&O	FY15 D&O
Inspections																			
Major Sources																			
Non-Major Sources																			
Area Sources																			
Asbestos/Demolition																			
Stack Test Oversight																			
CEM Report Review/Audit																			
Review Month Emiss. Rpts.																			
Review Excess Emiss. Rpts.																			
Review Annual Compl. Cert.																			
Complaint Investigation																			
Initial Response																			
Field Response																			
Followup																			
Administrative Enforcement																			
NOV Processing																			
Total		0.00	0.00	0.0000	0.0000										\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

E. Technical Assistance

Activity	Position #	Hours	Tasks/Yr	Tasks/Yr	Hours	Hours	FTE	FTE	FY14 Salary & Benefits	FY15 Salary & Benefits	FY14 Indirect Cost	FY15 Indirect Cost	FY14 Goods/Serv. & Travel	FY15 Goods/Serv. & Travel	Cost FY14	Cost FY15	Biennial Total	FY14 D&O	FY15 D&O
		Per Task	FY14	FY15	FY14	FY15	FY14	FY15			Cost	Cost							
Program Management																			
>Federal-State Tech. & Compliance																			
>State-Local Policy Coord.incl. inter/intra agency agreements and rule dev.																			
Source Assistance																			
>Trade Association Coord. and Oversight																			
>Industry Specific Plans cross/multi-media general permit work																			
Source Environmental Audits																			
>Business Advisories Laws & Regulations Compliance Outreach																			
Pollution Prevention Accidental Release Health & Environmental Effects																			
Prog. Evaluation & Compliance																			
>Business Liaison - Ombudsman																			
>Compliance Advisory Panel																			
>Program Effectiveness																			
Total					0.00	0.00	0.0000	0.0000							\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

F. Outreach & Education

Activity	Position #	Hours	Tasks/Yr	Tasks/Yr	Hours	Hours	FTE	FTE	FY14 Salary & Benefits	FY15 Salary & Benefits	FY14 Indirect Cost	FY15 Indirect Cost	FY14 Goods/Serv. & Travel	FY15 Goods/Serv. & Travel	Cost FY14	Cost FY15	Biennial Total	FY14 D&O	FY15 D&O
		Per Task	FY14	FY15	FY14	FY15	FY14	FY15			Cost	Cost							
Information/Outreach																			
General Info/Outreach																			
Permit Workshops																			
>Permit Register																			
>Fact Sheets																			
Total					0.00	0.00	0.0000	0.0000							\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

G. Ambient Monitoring & Oversight

Activity	Position #	Hours	Tasks/Yr	Tasks/Yr	Hours	Hours	FTE	FTE	FY14 Salary & Benefits	FY15 Salary & Benefits	FY14 Indirect Cost	FY15 Indirect Cost	FY14 Goods/Serv. & Travel	FY15 Goods/Serv. & Travel	Cost FY14	Cost FY15	Biennial Total	FY14 D&O	FY15 D&O
		Per Task	FY14	FY15	FY14	FY15	FY14	FY15			Cost	Cost							
Ambient Monitoring																			
> Monitoring																			
Local Program Oversight																			
Coordination																			
>Local Performance Audits																			
> Routine Audits																			
EPA Oversight/Reporting																			
>Prg. Rept-Airs/AFS																			
>Ecology Performance Audits-HPV																			
Total					0.00	0.00	0.0000	0.0000							\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

Total	0.00	0.00	0.0000	0.0000		\$ -	\$ -	\$ -	\$ -	\$ -
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>Followup																			
Interagency Agreement																			
>Emiss. Inventory Update		0.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 73,299.49	\$ 73,299.49	\$ 25,728.12	\$ 25,728.12	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Engineering Support	4294	1.00	52.00	52.00	52.00	52.00	0.0250	0.0250	\$ 115,269.92	\$ 115,269.92	\$ 40,459.74	\$ 40,459.74	\$ 6,105.00	\$ 6,105.00	\$4,045.87	\$4,045.87	\$8,091.73	\$4,045.87	\$4,045.87
Engineering Development	4294	2.00	4.00	4.00	8.00	8.00	0.0038	0.0038	\$ 115,269.92	\$ 115,269.92	\$ 40,459.74	\$ 40,459.74	\$ 6,105.00	\$ 6,105.00	\$622.44	\$622.44	\$1,244.88	\$622.44	\$622.44
	839	1.00	4.00	4.00	4.00	4.00	0.0019	0.0019	\$ 121,115.68	\$ 121,115.68	\$ 42,511.60	\$ 42,511.60	\$ 6,105.00	\$ 6,105.00	\$326.41	\$326.41	\$652.82	\$326.41	\$326.41
Total					1724.00	944.00	0.8288	0.4538							\$96,515.08	\$54,899.48	\$151,414.56	\$96,515.08	\$54,899.48

C. Permit Processing

Activity	Position #	Hours Per Task	Tasks/Yr FY14	Tasks/Yr FY15	Hours FY14	Hours FY15	FTE FY14	FTE FY15	FY14 Salary & Benefits	FY15 Salary & Benefits	FY14 Indirect Cost Cost	FY15 Indirect Cost Cost	FY14 Goods/Serv. & Travel	FY15 Goods/Serv. & Travel	Cost FY14	Cost FY15	Biennial Total	FY14 D&O	FY15 D&O
Permit Application Review																			
Preapplication Assistance		0.00	0	0	0.00	0.00	0.0000	0.0000	\$ 98,812.22	\$ 98,812.22	\$ 34,683.09	\$ 34,683.09	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00		
		0.00	0	0	0.00	0.00	0.0000	0.0000	\$ 103,813.16	\$ 103,813.16	\$ 36,438.42	\$ 36,438.42	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00		
Permit Renewals																			
Major Sources - Other																			
Non-Major Sources																			
Prepare Draft Permit																			
Public Meetings																			
Final Permits/Comments																			
Permit Modifications																			
Significant																			
Minor																			
Admin. Permit Amend.																			
Permit Reopening																			
Early Reduction Reviews																			
Operational Flex. Reviews																			
Permit Appeals																			
Total					0.00	0.00	0.0000	0.0000							\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

D. Permit Management

Activity	Position #	Hours Per Task	Tasks/Yr FY14	Tasks/Yr FY15	Hours FY14	Hours FY15	FTE FY14	FTE FY15	FY14 Salary & Benefits	FY15 Salary & Benefits	FY14 Indirect Cost Cost	FY15 Indirect Cost Cost	FY14 Goods/Serv. & Travel	FY15 Goods/Serv. & Travel	Cost FY14	Cost FY15	Biennial Total	FY14 D&O	FY15 D&O
Inspections																			
Major Sources																			
Non-Major Sources																			
Area Sources																			
Asbestos/Demolition		0.00	0	0	0.00	0.00	0.0000	0.0000	\$ 103,813.16	\$ 103,813.16	\$ 36,438.42	\$ 36,438.42	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00		
Stack Test Oversight																			
CEM Report Review/Audit																			
Review Month Emiss. Rpts.																			
Review Excess Emiss. Rpts.																			
Review Annual Compl. Cert.																			
Complaint Investigation																			
Initial Response																			
Field Response																			
Followup																			
Administrative Enforcement																			
NOV Processing																			
Total					0.00	0.00	0.0000	0.0000							\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

E. Technical Assistance

Activity	Position #	Hours Per Task	Tasks/Yr FY14	Tasks/Yr FY15	Hours FY14	Hours FY15	FTE FY14	FTE FY15	FY14 Salary & Benefits	FY15 Salary & Benefits	FY14 Indirect Cost Cost	FY15 Indirect Cost Cost	FY14 Goods/Serv. & Travel	FY15 Goods/Serv. & Travel	Cost FY14	Cost FY15	Biennial Total	FY14 D&O	FY15 D&O
Program Management																			
>Federal-State Tech. & Compliance																			
>State-Local Policy Coord.incl. inter/intra agency agreements and rule dev.	4294	1.00	52.00	52.00	52.00	52.00	0.0250	0.0250	\$ 115,269.92	\$ 115,269.92	\$ 40,459.74	\$ 40,459.74	\$ 6,105.00	\$ 6,105.00	\$4,045.87	\$4,045.87	\$8,091.73	\$4,045.87	\$4,045.87
	839	1.00	12.00	12.00	12.00	12.00	0.0058	0.0058	\$ 121,115.68	\$ 121,115.68	\$ 42,511.60	\$ 42,511.60	\$ 6,105.00	\$ 6,105.00	\$979.22	\$979.22	\$1,958.45	\$979.22	\$979.22

Source Assistance	0.00	52.00	52.00	0.00	0.00	0.0000	0.0000	\$ 98,812.22	\$ 98,812.22	\$ 34,683.09	\$ 34,683.09	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
	0.00	52.00	52.00	0.00	0.00	0.0000	0.0000	\$ 103,813.16	\$ 103,813.16	\$ 36,438.42	\$ 36,438.42	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
>Trade Association Coord. and Oversight	0.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 98,812.22	\$ 98,812.22	\$ 34,683.09	\$ 34,683.09	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
>Industry Specific Plans cross/multi-media general permit work	0.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 98,812.22	\$ 98,812.22	\$ 34,683.09	\$ 34,683.09	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Source Environmental Audits	0.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 98,812.22	\$ 98,812.22	\$ 34,683.09	\$ 34,683.09	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
>Business Advisories Laws & Regulations Compliance Outreach																		
Pollution Prevention Accidental Release Health & Environmental Effects	0.00	12.00	12.00	0.00	0.00	0.0000	0.0000	\$ 98,812.22	\$ 98,812.22	\$ 34,683.09	\$ 34,683.09	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Prog. Evaluation & Compliance	0.00	1.00	1.00	0.00	0.00	0.0000	0.0000	\$ 98,812.22	\$ 98,812.22	\$ 34,683.09	\$ 34,683.09	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
>Business Liaison - Ombudsman	0.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 98,812.22	\$ 98,812.22	\$ 34,683.09	\$ 34,683.09	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
>Compliance Advisory Panel	0.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 98,812.22	\$ 98,812.22	\$ 34,683.09	\$ 34,683.09	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
>Program Effectiveness	0.00	1.00	1.00	0.00	0.00	0.0000	0.0000	\$ 98,812.22	\$ 98,812.22	\$ 34,683.09	\$ 34,683.09	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Total				64.00	64.00	0.0308	0.0308							\$5,025.09	\$5,025.09	\$10,050.18	\$5,025.09	\$5,025.09

F. Outreach & Education

Activity	Position #	Hours Per Task	Tasks/Yr FY14	Tasks/Yr FY15	Hours FY14	Hours FY15	FTE FY14	FTE FY15	FY14 Salary & Benefits	FY15 Salary & Benefits	FY14 Indirect Cost Cost	FY15 Indirect Cost Cost	FY14 Goods/Serv. & Travel	FY15 Goods/Serv. & Travel	Cost FY14	Cost FY15	Biennial Total	FY14 D&O	FY15 D&O
Information/Outreach																			
General Info/Outreach																			
Permit Workshops																			
>Permit Register																			
>Fact Sheets																			
Total					0.00	0.00	0.0000	0.0000							\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

G. Ambient Monitoring & Oversight

Activity	Position #	Hours Per Task	Tasks/Yr FY14	Tasks/Yr FY15	Hours FY14	Hours FY15	FTE FY14	FTE FY15	FY14 Salary & Benefits	FY15 Salary & Benefits	FY14 Indirect Cost Cost	FY15 Indirect Cost Cost	FY14 Goods/Serv. & Travel	FY15 Goods/Serv. & Travel	Cost FY14	Cost FY15	Biennial Total	FY14 D&O	FY15 D&O
Ambient Monitoring																			
> Monitoring																			
Local Program Oversight																			
Coordination																			
>Local Performance Audits																			
> Routine Audits																			
EPA Oversight/Reporting																			
>Prg. Rept-Airs/AFS																			
>Ecology Performance Audits-HPV																			
Total					0.00	0.00	0.0000	0.0000							\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

EPA Oversight/Reporting											
>Prg. Rept-Airs/AFS											
>Ecology Performance Audits-HPV											
Total	0.00	0.00	0.0000	0.0000		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

Local Program Oversight																					
Coordination	4009	8.00	4.00	4.00	32.00	32.00	0.0154	0.0154	\$ 77,623.92	\$ 77,623.92	\$ 27,246.00	\$ 27,246.00	\$ 6,105.00	\$ 6,105.00	\$1,707.31	\$1,707.31	\$3,414.61	\$853.65	\$853.65		
>Local Performance Audits	4009	60.00	7.00	7.00	420.00	420.00	0.2019	0.2019	\$ 77,623.92	\$ 77,623.92	\$ 27,246.00	\$ 27,246.00	\$ 6,105.00	\$ 6,105.00	\$22,408.40	\$22,408.40	\$44,816.79	\$22,408.40	\$22,408.40		
> Routine Fiscal Audits	4009	80.00	1.00	0.00	80.00	0.00	0.0385	0.0000	\$ 77,623.92	\$ 77,623.92	\$ 27,246.00	\$ 27,246.00	\$ 6,105.00	\$ 6,105.00	\$4,268.27	\$0.00	\$4,268.27	\$0.00	\$0.00		
EPA Oversight/Reporting																					
>Prg. Rept-Airs/AFS																					
>Ecology Performance Audits-HPV																					
Total					532.00	452.00	0.26	0.22							\$28,383.97	\$24,115.70	\$52,499.67	\$23,262.05	\$23,262.05		

>Followup																					
>Interagency Agree																					
Federal Prog. Delegation																					
>Prog. Deleg. Package																					
>Followup																					
Interagency Agreement																					
>Emiss. Inventory Update																					
Engineering Support																					
Engineering Development																					
Total					0.00	0.00	0.0000	0.0000									\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

C. Permit Processing

Activity	Position #	Hours Per Task	Tasks/Yr FY14	Tasks/Yr FY15	Hours FY14	Hours FY15	FTE FY14	FTE FY15	FY14 Salary & Benefits	FY15 Salary & Benefits	FY14 Indirect Cost Cost	FY15 Indirect Cost Cost	FY14 Goods/Serv. & Travel	FY15 Goods/Serv. & Travel	Cost FY14	Cost FY15	Biennial Total	FY14 D&O	FY15 D&O
Permit Application Review (new)	3562	40.00	1.00	1.00	40.00	40.00	0.0192	0.0192	\$ 77,623.92	\$ 77,623.92	\$ 27,246.00	\$ 27,246.00	\$ 6,105.00	\$ 6,105.00	\$2,134.13	\$2,134.13	\$4,268.27		
Preapplication Assistance (new+renew)	3562	8.00	2.00	1.00	16.00	8.00	0.0077	0.0038	\$ 77,623.92	\$ 77,623.92	\$ 27,246.00	\$ 27,246.00	\$ 6,105.00	\$ 6,105.00	\$853.65	\$426.83	\$1,280.48		
Permit Renewals																			
Major Sources - Other	3562	120.00	2.00	1.00	240.00	120.00	0.1154	0.0577	\$ 77,623.92	\$ 77,623.92	\$ 27,246.00	\$ 27,246.00	\$ 6,105.00	\$ 6,105.00	\$12,804.80	\$6,402.40	\$19,207.20		
Non-Major Sources																			
Prepare Draft Permit	3562	280.00	2.00	1.00	560.00	280.00	0.2692	0.1346	\$ 77,623.92	\$ 77,623.92	\$ 27,246.00	\$ 27,246.00	\$ 6,105.00	\$ 6,105.00	\$29,877.86	\$14,938.93	\$44,816.79		
Public Meetings																			
Final Permits/Comments	3562	150.00	2.00	1.00	300.00	150.00	0.1442	0.0721	\$ 77,623.92	\$ 77,623.92	\$ 27,246.00	\$ 27,246.00	\$ 6,105.00	\$ 6,105.00	\$16,006.00	\$8,003.00	\$24,009.00		
Permit Modifications																			
Significant	3562	60.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 77,623.92	\$ 77,623.92	\$ 27,246.00	\$ 27,246.00	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00		
Minor																			
Admin. Permit Amend.	3562	40.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 77,623.92	\$ 77,623.92	\$ 27,246.00	\$ 27,246.00	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00		
Permit Reopening	3562	60.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 77,623.92	\$ 77,623.92	\$ 27,246.00	\$ 27,246.00	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00		
Early Reduction Reviews																			
Operational Flex. Reviews																			
Permit Appeals																			
Total					1156.00	598.00	0.5558	0.2875							\$61,676.44	\$31,905.29	\$93,581.73	\$0.00	\$0.00

D. Permit Management

Activity	Position #	Hours Per Task	Tasks/Yr FY14	Tasks/Yr FY15	Hours FY14	Hours FY15	FTE FY14	FTE FY15	FY14 Salary & Benefits	FY15 Salary & Benefits	FY14 Indirect Cost Cost	FY15 Indirect Cost Cost	FY14 Goods/Serv. & Travel	FY15 Goods/Serv. & Travel	Cost FY14	Cost FY15	Biennial Total	FY14 D&O	FY15 D&O
Inspections																			
Major Sources	3178	40.00	6.00	6.00	240.00	240.00	0.1154	0.1154	\$ 77,623.92	\$ 77,623.92	\$ 27,246.00	\$ 27,246.00	\$ 6,105.00	\$ 6,105.00	\$12,804.80	\$12,804.80	\$25,609.60		
Non-Major Sources	3178	25.00	1.00	1.00	25.00	25.00	0.0120	0.0120	\$ 77,623.92	\$ 77,623.92	\$ 27,246.00	\$ 27,246.00	\$ 6,105.00	\$ 6,105.00	\$1,333.83	\$1,333.83	\$2,667.67		
Area Sources																			
Asbestos/Demolition																			
Stack Test Oversight	3178	24.00	6.00	6.00	144.00	144.00	0.0692	0.0692	\$ 77,623.92	\$ 77,623.92	\$ 27,246.00	\$ 27,246.00	\$ 6,105.00	\$ 6,105.00	\$7,682.88	\$7,682.88	\$15,365.76		
CEM Report Review/Audit	3178	2.00	10.00	10.00	20.00	20.00	0.0096	0.0096	\$ 77,623.92	\$ 77,623.92	\$ 27,246.00	\$ 27,246.00	\$ 6,105.00	\$ 6,105.00	\$1,067.07	\$1,067.07	\$2,134.13		
Review Month Emiss. Rpts.																			
Review Excess Emiss. Rpts.	3178	6.00	132.00	132.00	792.00	792.00	0.3808	0.3808	\$ 77,623.92	\$ 77,623.92	\$ 27,246.00	\$ 27,246.00	\$ 6,105.00	\$ 6,105.00	\$42,255.83	\$42,255.83	\$84,511.67		
Review Annual Compl. Cert.	3178	3.00	12.00	12.00	36.00	36.00	0.0173	0.0173	\$ 77,623.92	\$ 77,623.92	\$ 27,246.00	\$ 27,246.00	\$ 6,105.00	\$ 6,105.00	\$1,920.72	\$1,920.72	\$3,841.44		
Complaint Investigation	3178	4.00	6.00	6.00	24.00	24.00	0.0115	0.0115	\$ 77,623.92	\$ 77,623.92	\$ 27,246.00	\$ 27,246.00	\$ 6,105.00	\$ 6,105.00	\$1,280.48	\$1,280.48	\$2,560.96		
Initial Response																			
Field Response																			
Followup																			
Administrative Enforcement	2030	188.00	2.00	2.00	376.00	376.00	0.1808	0.1808	\$ 91,407.76	\$ 91,407.76	\$ 32,084.12	\$ 32,084.12	\$ 6,105.00	\$ 6,105.00	\$23,427.13	\$23,427.13	\$46,854.26		
NOV Processing	3178	100.00	4.00	4.00	400.00	400.00	0.1923	0.1923	\$ 77,623.92	\$ 77,623.92	\$ 27,246.00	\$ 27,246.00	\$ 6,105.00	\$ 6,105.00	\$21,341.33	\$21,341.33	\$42,682.66		
Total					2057.00	2057.00	0.9889	0.9889							\$113,114.07	\$113,114.07	\$226,228.14	\$0.00	\$0.00

E. Technical Assistance

Activity	Position #	Hours Per Task	Tasks/Yr FY14	Tasks/Yr FY15	Hours FY14	Hours FY15	FTE FY14	FTE FY15	FY14 Salary & Benefits	FY15 Salary & Benefits	FY14 Indirect Cost Cost	FY15 Indirect Cost Cost	FY14 Goods/Serv. & Travel	FY15 Goods/Serv. & Travel	Cost FY14	Cost FY15	Biennial Total	FY14 D&O	FY15 D&O
Program Management >Federal-State Tech. & Compliance																			
>State-Local Policy Coord.incl. inter/intra agency agreements and rule dev. Source Assistance	2030	4	140	140	560.00	560.00	0.2692	0.2692	\$ 91,407.76	\$ 91,407.76	\$ 32,084.12	\$ 32,084.12	\$ 6,105.00	\$ 6,105.00	\$34,891.47	\$34,891.47	\$69,782.94		
>Trade Association Coord. and Oversight >Industry Specific Plans cross/multi- media general permit work Source Environmental Audits																			
>Business Advisories Laws & Regulations Compliance Outreach Pollution Prevention Accidental Release Health & Environmental Effects Prog. Evaluation & Compliance																			
>Business Liaison - Ombudsman >Compliance Advisory Panel >Program Effectiveness	506	24	8	8	192.00	192.00	0.0923	0.0923	\$ 123,000.37	\$ 123,000.37	\$ 43,173.13	\$ 43,173.13	\$ 6,105.00	\$ 6,105.00	\$ 15,902.63	\$ 15,902.63	\$ 31,805.26		
Total					752.00	752.00	0.3615	0.3615							\$50,794.10	\$50,794.10	\$101,588.20	\$0.00	\$0.00

F. Outreach & Education

Activity	Position #	Hours Per Task	Tasks/Yr FY14	Tasks/Yr FY15	Hours FY14	Hours FY15	FTE FY14	FTE FY15	FY14 Salary & Benefits	FY15 Salary & Benefits	FY14 Indirect Cost Cost	FY15 Indirect Cost Cost	FY14 Goods/Serv. & Travel	FY15 Goods/Serv. & Travel	Cost FY14	Cost FY15	Biennial Total	FY14 D&O	FY15 D&O
Information/Outreach General Info/Outreach Permit Workshops >Permit Register >Fact Sheets	3334	104.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 66,557.48	\$ 66,557.48	\$ 23,361.68	\$ 23,361.68	\$ 6,105.00	\$ 6,105.00	\$ -	\$ -	\$ -		
Total					0.00	0.00	0.0000	0.0000	\$ 66,557.48	\$ 66,557.48	\$ 23,361.68	\$ 23,361.68	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

G. Ambient Monitoring & Oversight

Activity	Position #	Hours Per Task	Tasks/Yr FY14	Tasks/Yr FY15	Hours FY14	Hours FY15	FTE FY14	FTE FY15	FY14 Salary & Benefits	FY15 Salary & Benefits	FY14 Indirect Cost Cost	FY15 Indirect Cost Cost	FY14 Goods/Serv. & Travel	FY15 Goods/Serv. & Travel	Cost FY14	Cost FY15	Biennial Total	FY14 D&O	FY15 D&O
Ambient Monitoring > Monitoring Local Program Oversight Coordination >Local Performance Audits > Routine Audits EPA Oversight/Reporting >Prg. Rept-Airs/AFS >Ecology Performance Audits-HPV																			
Total					0.00	0.00	0.0000	0.0000							\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

Major Sources	3282	40.00	3.00	3.00	120.00	120.00	0.0577	0.0577	\$ 73,451.55	\$ 73,451.55	\$ 25,781.49	\$ 25,781.49	\$ 6,105.00	\$ 6,105.00	\$6,077.19	\$6,077.19	\$12,154.39		
Non-Major Sources	3282	40.00	1.00	1.00	40.00	40.00	0.0192	0.0192	\$ 73,451.55	\$ 73,451.55	\$ 25,781.49	\$ 25,781.49	\$ 6,105.00	\$ 6,105.00	\$2,025.73	\$2,025.73	\$4,051.46		
Area Sources	3282	40.00	1.00	1.00	40.00	40.00	0.0192	0.0192	\$ 73,451.55	\$ 73,451.55	\$ 25,781.49	\$ 25,781.49	\$ 6,105.00	\$ 6,105.00	\$2,025.73	\$2,025.73	\$4,051.46		
Asbestos/Demolition																			
Stack Test Oversight	3424	24.00	1.00	1.00	24.00	24.00	0.0115	0.0115	\$ 80,689.21	\$ 80,689.21	\$ 28,321.91	\$ 28,321.91	\$ 6,105.00	\$ 6,105.00	\$1,328.26	\$1,328.26	\$2,656.53		
	3282	24.00	1.00	1.00	24.00	24.00	0.0115	0.0115	\$ 73,451.55	\$ 73,451.55	\$ 25,781.49	\$ 25,781.49	\$ 6,105.00	\$ 6,105.00	\$1,215.44	\$1,215.44	\$2,430.88		
CEM Report Review/Audit	3424	2.00	6.00	6.00	12.00	12.00	0.0058	0.0058	\$ 80,689.21	\$ 80,689.21	\$ 28,321.91	\$ 28,321.91	\$ 6,105.00	\$ 6,105.00	\$664.13	\$664.13	\$1,328.26		
	3282	2.00	6.00	6.00	12.00	12.00	0.0058	0.0058	\$ 73,451.55	\$ 73,451.55	\$ 25,781.49	\$ 25,781.49	\$ 6,105.00	\$ 6,105.00	\$607.72	\$607.72	\$1,215.44		
Review Month Emiss. Rpts.	3424	10.00	5.00	5.00	50.00	50.00	0.0240	0.0240	\$ 80,689.21	\$ 80,689.21	\$ 28,321.91	\$ 28,321.91	\$ 6,105.00	\$ 6,105.00	\$2,767.21	\$2,767.21	\$5,534.43		
	3282	10.00	5.00	5.00	50.00	50.00	0.0240	0.0240	\$ 73,451.55	\$ 73,451.55	\$ 25,781.49	\$ 25,781.49	\$ 6,105.00	\$ 6,105.00	\$2,532.16	\$2,532.16	\$5,064.33		
Review Excess Emiss. Rpts.	3424	4.00	12.00	12.00	48.00	48.00	0.0231	0.0231	\$ 80,689.21	\$ 80,689.21	\$ 28,321.91	\$ 28,321.91	\$ 6,105.00	\$ 6,105.00	\$2,656.53	\$2,656.53	\$5,313.05		
	3282	4.00	12.00	12.00	48.00	48.00	0.0231	0.0231	\$ 73,451.55	\$ 73,451.55	\$ 25,781.49	\$ 25,781.49	\$ 6,105.00	\$ 6,105.00	\$2,430.88	\$2,430.88	\$4,861.76		
Review Annual Compl. Cert.	3424	10.00	3.00	3.00	30.00	30.00	0.0144	0.0144	\$ 80,689.21	\$ 80,689.21	\$ 28,321.91	\$ 28,321.91	\$ 6,105.00	\$ 6,105.00	\$1,660.33	\$1,660.33	\$3,320.66		
	3282	10.00	3.00	3.00	0.00	30.00	0.0000	0.0144	\$ 73,451.55	\$ 73,451.55	\$ 25,781.49	\$ 25,781.49	\$ 6,105.00	\$ 6,105.00	\$0.00	\$1,519.30	\$1,519.30		
Complaint Investigation	3333	4.00	4.00	4.00	16.00	16.00	0.0077	0.0077	\$ 77,623.92	\$ 77,623.92	\$ 27,246.00	\$ 27,246.00	\$ 6,105.00	\$ 6,105.00	\$853.65	\$853.65	\$1,707.31		
Initial Response																			
Field Response																			
Followup																			
Administrative Enforcement	3333	150.00	0.50	0.50	75.00	75.00	0.0361	0.0361	\$ 77,623.92	\$ 77,623.92	\$ 27,246.00	\$ 27,246.00	\$ 6,105.00	\$ 6,105.00	\$4,001.50	\$4,001.50	\$8,003.00		
	3282	150.00	0.50	0.50	75.00	75.00	0.0361	0.0361	\$ 73,451.55	\$ 73,451.55	\$ 25,781.49	\$ 25,781.49	\$ 6,105.00	\$ 6,105.00	\$3,798.25	\$3,798.25	\$7,596.49		
EPA Oversight/Reporting	3424	1.00	6.00	6.00	6.00	6.00	0.0029	0.0029	\$ 80,689.21	\$ 80,689.21	\$ 28,321.91	\$ 28,321.91	\$ 6,105.00	\$ 6,105.00	\$332.07	\$332.07	\$664.13		
Prg. Rept-Airs/AFS	3424	8.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 80,689.21	\$ 80,689.21	\$ 28,321.91	\$ 28,321.91	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00		
	3282	8.00	12.00	12.00	96.00	96.00	0.0462	0.0462	\$ 73,451.55	\$ 73,451.55	\$ 25,781.49	\$ 25,781.49	\$ 6,105.00	\$ 6,105.00	\$4,861.76	\$4,861.76	\$9,723.51		
NOV Processing																			
Total					766.00	796.00	0.3683	0.3827							\$39,838.54	\$41,357.84	\$81,196.39	\$0.00	\$0.00

E. Technical Assistance

Activity	Position #	Hours Per Task	Tasks/Yr FY14	Tasks/Yr FY15	Hours FY14	Hours FY15	FTE FY14	FTE FY15	FY14 Salary & Benefits	FY15 Salary & Benefits	FY14 Indirect Cost Cost	FY15 Indirect Cost Cost	FY14 Goods/Serv. & Travel	FY15 Goods/Serv. & Travel	Cost FY14	Cost FY15	Biennial Total	FY14 D&O	FY15 D&O
Program Management																			
>Federal-State Tech. & Compliance																			
>State-Local Policy Coord.incl. inter/intra agency agreements and rule dev.																			
Source Assistance	3424	40	1	1	40.00	40.00	0.0192	0.0192	\$ 80,689.21	\$ 80,689.21	\$ 28,321.91	\$ 28,321.91	\$ 6,105.00	\$ 6,105.00	\$2,213.77	\$2,213.77	\$4,427.54		
	3333	40	5	5	200.00	200.00	0.0962	0.0962	\$ 77,623.92	\$ 77,623.92	\$ 27,246.00	\$ 27,246.00	\$ 6,105.00	\$ 6,105.00	\$10,670.66	\$10,670.66	\$21,341.33		
	3424	8	30	30	240.00	240.00	0.1154	0.1154	\$ 80,689.21	\$ 80,689.21	\$ 28,321.91	\$ 28,321.91	\$ 6,105.00	\$ 6,105.00	\$13,282.63	\$13,282.63	\$26,565.26		
	3333	8	15	15	120.00	120.00	0.0577	0.0577	\$ 77,623.92	\$ 77,623.92	\$ 27,246.00	\$ 27,246.00	\$ 6,105.00	\$ 6,105.00	\$6,402.40	\$6,402.40	\$12,804.80		
>Trade Association Coord. and Oversight																			
>Industry Specific Plans cross/multi- media general permit work																			
Source Environmental Audits																			
>Business Advisories Laws & Regulations Compliance Outreach																			
Pollution Prevention Accidental Release Health & Environmental Effects																			
Prog. Evaluation & Compliance																			
>Business Liaison - Ombudsman																			
>Compliance Advisory Panel																			
>Program Effectiveness																			
Total					600.00	600.00	0.2885	0.2885							\$32,569.47	\$32,569.47	\$65,138.93	\$0.00	\$0.00

F. Outreach & Education

Activity	Position #	Hours	Tasks/Yr	Tasks/Yr	Hours	Hours	FTE	FTE	FY14 Salary & Benefits	FY15 Salary & Benefits	FY14 Indirect Cost	FY15 Indirect Cost	FY14 Goods/Serv. & Travel	FY15 Goods/Serv. & Travel	Cost FY14	Cost FY15	Biennial Total	FY14 D&O	FY15 D&O	
		Per Task	FY14	FY15	FY14	FY15	FY14	FY15			Cost	Cost								
Information/Outreach																				
General Info/Outreach																				
Permit Workshops																				
>Permit Register																				
>Fact Sheets																				
Total					0.00	0.00	0.0000	0.0000							\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	

G. Ambient Monitoring & Oversight

Activity	Position #	Hours	Tasks/Yr	Tasks/Yr	Hours	Hours	FTE	FTE	FY14 Salary & Benefits	FY15 Salary & Benefits	FY14 Indirect Cost	FY15 Indirect Cost	FY14 Goods/Serv. & Travel	FY15 Goods/Serv. & Travel	Cost FY14	Cost FY15	Biennial Total	FY14 D&O	FY15 D&O	
		Per Task	FY14	FY15	FY14	FY15	FY14	FY15			Cost	Cost								
Ambient Monitoring																				
> Monitoring																				
Local Program Oversight																				
Coordination																				
>Local Performance Audits																				
> Routine Audits																				
>Ecology Performance Audits-HPV		0.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 80,204.23	\$ 80,204.23	\$ 28,151.68	\$ 28,151.68	\$ 5,337.00	\$ 5,337.00	\$0.00	\$0.00	\$0.00			
Total					0.00	0.00	0.0000	0.0000							\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	

>CAM Monitoring Guidance																			
>Insignif. Emiss. Guidance																			
>Federal Rule Codif.																			
>Acid Rain																			
>New 112 R. / Plans																			
Local Program Deleg.																			
Review Prog. Submittal																			
>Followup																			
>Interagency Agree																			
Federal Prog. Delegation																			
>Prog. Deleg. Package																			
>Followup																			
Interagency Agreement																			
>Emiss. Inventory Update																			
Engineering Support																			
Engineering Development																			
Total					0.00	0.00	0.0000	0.0000							\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

C. Permit Processing

Activity	Position #	Hours Per Task	Tasks/Yr FY14	Tasks/Yr FY15	Hours FY14	Hours FY15	FTE FY14	FTE FY15	FY14 Salary & Benefits	FY15 Salary & Benefits	FY14 Indirect Cost Cost	FY15 Indirect Cost Cost	FY14 Goods/Serv. & Travel	FY15 Goods/Serv. & Travel	Cost FY14	Cost FY15	Biennial Total	FY14 D&O	FY15 D&O
Permit Application Review	2427	80.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 104,440.91	\$ 104,440.91	\$ 36,658.76	\$ 36,658.76	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00		
	2300	80.00	1.00	0.00	80.00	0.00	0.0385	0.0000	\$ 104,440.91	\$ 104,440.91	\$ 36,658.76	\$ 36,658.76	\$ 6,105.00	\$ 6,105.00	\$5,661.72	\$0.00	\$5,661.72		
	3310	80.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 115,269.92	\$ 115,269.92	\$ 40,459.74	\$ 40,459.74	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00		
	0817	80.00	1.00	0.00	80.00	0.00	0.0385	0.0000	\$ 104,440.91	\$ 104,440.91	\$ 36,658.76	\$ 36,658.76	\$ 6,105.00	\$ 6,105.00	\$5,661.72	\$0.00	\$5,661.72		
	2353	80.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 96,934.07	\$ 96,934.07	\$ 34,023.86	\$ 34,023.86	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00		
	819	80.00	0.00	1.00	0.00	80.00	0.0000	0.0385	\$ 115,296.92	\$ 115,296.92	\$ 40,469.22	\$ 40,469.22	\$ 6,105.00	\$ 6,105.00	\$0.00	\$6,225.81	\$6,225.81		
	3309	80.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 104,440.91	\$ 104,440.91	\$ 36,658.76	\$ 36,658.76	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00		
Preapplication Assistance																			
Permit Renewals																			
Major Sources - Other																			
Non-Major Sources																			
Prepare Draft Permit	2427	480.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 104,440.91	\$ 104,440.91	\$ 36,658.76	\$ 36,658.76	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00		
	2300	480.00	0.00	1.00	0.00	480.00	0.0000	0.2308	\$ 104,440.91	\$ 104,440.91	\$ 36,658.76	\$ 36,658.76	\$ 6,105.00	\$ 6,105.00	\$0.00	\$33,970.31	\$33,970.31		
	3310	480.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 115,269.92	\$ 115,269.92	\$ 40,459.74	\$ 40,459.74	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00		
	0817	480.00	0.00	1.00	0.00	480.00	0.0000	0.2308	\$ 104,440.91	\$ 104,440.91	\$ 36,658.76	\$ 36,658.76	\$ 6,105.00	\$ 6,105.00	\$0.00	\$33,970.31	\$33,970.31		
	3309	480.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 104,440.91	\$ 104,440.91	\$ 36,658.76	\$ 36,658.76	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00		
	2353	480.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 96,934.07	\$ 96,934.07	\$ 34,023.86	\$ 34,023.86	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00		
	819	480.00	0.00	1.00	0.00	480.00	0.0000	0.2308	\$ 115,296.92	\$ 115,296.92	\$ 40,469.22	\$ 40,469.22	\$ 6,105.00	\$ 6,105.00	\$0.00	\$37,354.88	\$37,354.88		
Public Meetings	2427	80.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 104,440.91	\$ 104,440.91	\$ 36,658.76	\$ 36,658.76	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00		
	2300	80.00	0.00	1.00	0.00	80.00	0.0000	0.0385	\$ 104,440.91	\$ 104,440.91	\$ 36,658.76	\$ 36,658.76	\$ 6,105.00	\$ 6,105.00	\$0.00	\$5,661.72	\$5,661.72		
	3310	80.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 115,269.92	\$ 115,269.92	\$ 40,459.74	\$ 40,459.74	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00		
	0817	80.00	0.00	1.00	0.00	80.00	0.0000	0.0385	\$ 104,440.91	\$ 104,440.91	\$ 36,658.76	\$ 36,658.76	\$ 6,105.00	\$ 6,105.00	\$0.00	\$5,661.72	\$5,661.72		
	2447	40.00	0.00	3.00	0.00	120.00	0.0000	0.0577	\$ 59,160.29	\$ 59,160.29	\$ 20,765.26	\$ 20,765.26	\$ 6,105.00	\$ 6,105.00	\$0.00	\$4,963.30	\$4,963.30		
	3309	80.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 104,440.91	\$ 104,440.91	\$ 36,658.76	\$ 36,658.76	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00		
	2353	80.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 96,934.07	\$ 96,934.07	\$ 34,023.86	\$ 34,023.86	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00		
	819	80.00	0.00	1.00	0.00	80.00	0.0000	0.0385	\$ 115,296.92	\$ 115,296.92	\$ 40,469.22	\$ 40,469.22	\$ 6,105.00	\$ 6,105.00	\$0.00	\$6,225.81	\$6,225.81		
Final Permits/Comments	2427	120.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 104,440.91	\$ 104,440.91	\$ 36,658.76	\$ 36,658.76	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00		
	2300	120.00	0.00	1.00	0.00	120.00	0.0000	0.0577	\$ 104,440.91	\$ 104,440.91	\$ 36,658.76	\$ 36,658.76	\$ 6,105.00	\$ 6,105.00	\$0.00	\$8,492.58	\$8,492.58		
	3310	120.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 115,269.92	\$ 115,269.92	\$ 40,459.74	\$ 40,459.74	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00		
	0817	120.00	0.00	1.00	0.00	120.00	0.0000	0.0577	\$ 104,440.91	\$ 104,440.91	\$ 36,658.76	\$ 36,658.76	\$ 6,105.00	\$ 6,105.00	\$0.00	\$8,492.58	\$8,492.58		
	2353	120.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 96,934.07	\$ 96,934.07	\$ 34,023.86	\$ 34,023.86	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00		
	819	120.00	0.00	1.00	0.00	120.00	0.0000	0.0577	\$ 115,296.92	\$ 115,296.92	\$ 40,469.22	\$ 40,469.22	\$ 6,105.00	\$ 6,105.00	\$0.00	\$9,338.72	\$9,338.72		
	3309	120.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 104,440.91	\$ 104,440.91	\$ 36,658.76	\$ 36,658.76	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00		
Permit Modifications																			
Significant	2427	160.00	0.20	0.20	32.00	32.00	0.0154	0.0154	\$ 104,440.91	\$ 104,440.91	\$ 36,658.76	\$ 36,658.76	\$ 6,105.00	\$ 6,105.00	\$2,264.69	\$2,264.69	\$4,529.37		

	0819	160.00	0.10	0.10	16.00	16.00	0.0077	0.0077	\$ 115,296.92	\$ 115,296.92	\$	40,469.22	\$	40,469.22	\$	6,105.00	\$	6,105.00	\$1,245.16	\$1,245.16	\$2,490.33		
	2300	160.00	0.20	0.20	32.00	32.00	0.0154	0.0154	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$2,264.69	\$2,264.69	\$4,529.37		
	3310	160.00	0.10	0.10	16.00	16.00	0.0077	0.0077	\$ 115,269.92	\$ 115,269.92	\$	40,459.74	\$	40,459.74	\$	6,105.00	\$	6,105.00	\$1,244.88	\$1,244.88	\$2,489.76		
	0817	160.00	0.10	0.10	16.00	16.00	0.0077	0.0077	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$1,132.34	\$1,132.34	\$2,264.69		
	2353	160.00	0.10	0.10	16.00	16.00	0.0077	0.0077	\$ 96,934.07	\$ 96,934.07	\$	34,023.86	\$	34,023.86	\$	6,105.00	\$	6,105.00	\$1,054.33	\$1,054.33	\$2,108.66		
	3309	160.00	0.10	0.10	16.00	16.00	0.0077	0.0077	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$1,132.34	\$1,132.34	\$2,264.69		
	2447	30.00	1.00	1.00	30.00	30.00	0.0144	0.0144	\$ 59,160.29	\$ 59,160.29	\$	20,765.26	\$	20,765.26	\$	6,105.00	\$	6,105.00	\$1,240.83	\$1,240.83	\$2,481.65		
Minor	2353	80.00	0.10	0.10	8.00	8.00	0.0038	0.0038	\$ 96,934.07	\$ 96,934.07	\$	34,023.86	\$	34,023.86	\$	6,105.00	\$	6,105.00	\$527.17	\$527.17	\$1,054.33		
	2427	80.00	0.10	0.10	8.00	8.00	0.0038	0.0038	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$566.17	\$566.17	\$1,132.34		
	0819	80.00	0.10	0.10	8.00	8.00	0.0038	0.0038	\$ 115,296.92	\$ 115,296.92	\$	40,469.22	\$	40,469.22	\$	6,105.00	\$	6,105.00	\$622.58	\$622.58	\$1,245.16		
	2300	80.00	0.10	0.10	8.00	8.00	0.0038	0.0038	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$566.17	\$566.17	\$1,132.34		
	3310	80.00	0.10	0.10	8.00	8.00	0.0038	0.0038	\$ 115,269.92	\$ 115,269.92	\$	40,459.74	\$	40,459.74	\$	6,105.00	\$	6,105.00	\$622.44	\$622.44	\$1,244.88		
	0817	80.00	0.10	0.10	8.00	8.00	0.0038	0.0038	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$566.17	\$566.17	\$1,132.34		
	3309	80.00	0.10	0.10	8.00	8.00	0.0038	0.0038	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$566.17	\$566.17	\$1,132.34		
Admin. Permit Amend.	2426	8.00	1.00	1.00	8.00	8.00	0.0038	0.0038	\$ 66,954.62	\$ 66,954.62	\$	23,501.07	\$	23,501.07	\$	6,105.00	\$	6,105.00	\$371.39	\$371.39	\$742.77		
Permit Reopening	2427	160.00	1.00	0.00	160.00	0.00	0.0769	0.0000	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$11,323.44	\$0.00	\$11,323.44		
	819	160.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 115,296.92	\$ 115,296.92	\$	40,469.22	\$	40,469.22	\$	6,105.00	\$	6,105.00	\$0.00	\$0.00	\$0.00		
	2300	160.00	1.00	0.00	160.00	0.00	0.0769	0.0000	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$11,323.44	\$0.00	\$11,323.44		
	3310	160.00	1.00	0.00	160.00	0.00	0.0769	0.0000	\$ 115,269.92	\$ 115,269.92	\$	40,459.74	\$	40,459.74	\$	6,105.00	\$	6,105.00	\$12,448.82	\$0.00	\$12,448.82		
	817	160.00	1.00	0.00	160.00	0.00	0.0769	0.0000	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$11,323.44	\$0.00	\$11,323.44		
	2353	160.00	1.00	0.00	160.00	0.00	0.0769	0.0000	\$ 96,934.07	\$ 96,934.07	\$	34,023.86	\$	34,023.86	\$	6,105.00	\$	6,105.00	\$10,543.30	\$0.00	\$10,543.30		
	3309	160.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$0.00	\$0.00	\$0.00		
	2447	30.00	5.00	0.00	150.00	0.00	0.0721	0.0000	\$ 59,160.29	\$ 59,160.29	\$	20,765.26	\$	20,765.26	\$	6,105.00	\$	6,105.00	\$6,204.13	\$0.00	\$6,204.13		
Early Reduction Reviews																							
Operational Flex. Reviews	2353	40.00	0.10	0.10	4.00	4.00	0.0019	0.0019	\$ 96,934.07	\$ 96,934.07	\$	34,023.86	\$	34,023.86	\$	6,105.00	\$	6,105.00	\$263.58	\$263.58	\$527.17		
	2427	40.00	0.40	0.40	16.00	16.00	0.0077	0.0077	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$1,132.34	\$1,132.34	\$2,264.69		
	0819	40.00	0.20	0.10	8.00	4.00	0.0038	0.0019	\$ 115,296.92	\$ 115,296.92	\$	40,469.22	\$	40,469.22	\$	6,105.00	\$	6,105.00	\$622.58	\$311.29	\$933.87		
	2300	40.00	0.40	0.40	16.00	16.00	0.0077	0.0077	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$1,132.34	\$1,132.34	\$2,264.69		
	3310	40.00	0.20	0.20	8.00	8.00	0.0038	0.0038	\$ 115,269.92	\$ 115,269.92	\$	40,459.74	\$	40,459.74	\$	6,105.00	\$	6,105.00	\$622.44	\$622.44	\$1,244.88		
	0817	40.00	0.20	0.10	8.00	4.00	0.0038	0.0019	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$566.17	\$283.09	\$849.26		
	3309	40.00	0.30	0.20	12.00	8.00	0.0058	0.0038	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$849.26	\$566.17	\$1,415.43		
Permit Appeals	2353	300.00	0.10	0.00	30.00	0.00	0.0144	0.0000	\$ 96,934.07	\$ 96,934.07	\$	34,023.86	\$	34,023.86	\$	6,105.00	\$	6,105.00	\$1,976.87	\$0.00	\$1,976.87		
	2427	300.00	0.10	0.00	30.00	0.00	0.0144	0.0000	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$2,123.14	\$0.00	\$2,123.14		
	0819	300.00	0.00	0.30	0.00	90.00	0.0000	0.0433	\$ 115,296.92	\$ 115,296.92	\$	40,469.22	\$	40,469.22	\$	6,105.00	\$	6,105.00	\$0.00	\$7,004.04	\$7,004.04		
	2300	300.00	0.10	0.50	30.00	150.00	0.0144	0.0721	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$2,123.14	\$10,615.72	\$12,738.87		
	3310	300.00	0.10	0.00	30.00	0.00	0.0144	0.0000	\$ 115,269.92	\$ 115,269.92	\$	40,459.74	\$	40,459.74	\$	6,105.00	\$	6,105.00	\$2,334.15	\$0.00	\$2,334.15		
	817	300.00	0.10	0.30	30.00	90.00	0.0144	0.0433	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$2,123.14	\$6,369.43	\$8,492.58		
	3309	300.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$0.00	\$0.00	\$0.00		
Total					1570.00	2868.00	0.7548	1.3788											\$106,346.69	\$204,645.71	\$310,992.40	\$0.00	\$0.00

D. Permit Management

Activity	Position #	Hours	Tasks/Yr	Tasks/Yr	Hours	Hours	FTE	FTE	FY14 Salary & Benefits	FY15 Salary & Benefits	FY14 Indirect Cost	FY15 Indirect Cost	FY14 Goods/Serv. & Travel	FY15 Goods/Serv. & Travel	Cost FY14	Cost FY15	Biennial Total	FY14 D&O	FY15 D&O	
Inspections																				
Major Sources	2427	100.00	2.00	2.00	200.00	200.00	0.0962	0.0962	\$ 104,440.91	\$ 104,440.91	\$ 36,658.76	\$ 36,658.76	\$ 6,105.00	\$ 6,105.00	\$14,154.30	\$14,154.30	\$28,308.59			
	0819	100.00	1.00	1.00	100.00	100.00	0.0481	0.0481	\$ 115,269.92	\$ 115,269.92	\$ 40,459.74	\$ 40,459.74	\$ 6,105.00	\$ 6,105.00	\$7,780.51	\$7,780.51	\$15,561.03			
	2300	100.00	2.00	2.00	200.00	200.00	0.0962	0.0962	\$ 104,440.91	\$ 104,440.91	\$ 36,658.76	\$ 36,658.76	\$ 6,105.00	\$ 6,105.00	\$14,154.30	\$14,154.30	\$28,308.59			
	3310	100.00	1.00	1.00	100.00	100.00	0.0481	0.0481	\$ 115,269.92	\$ 115,269.92	\$ 40,459.74	\$ 40,459.74	\$ 6,105.00	\$ 6,105.00	\$7,780.51	\$7,780.51	\$15,561.03			
	0817	100.00	1.00	1.00	100.00	100.00	0.0481	0.0481	\$ 104,440.91	\$ 104,440.91	\$ 36,658.76	\$ 36,658.76	\$ 6,105.00	\$ 6,105.00	\$7,077.15	\$7,077.15	\$14,154.30			
	3309	100.00	1.00	1.00	100.00	100.00	0.0481	0.0481	\$ 104,440.91	\$ 104,440.91	\$ 36,658.76	\$ 36,658.76	\$ 6,105.00	\$ 6,105.00	\$7,077.15	\$7,077.15	\$14,154.30			
	2353	100.00	1.00	1.00	100.00	100.00	0.0481	0.0481	\$ 96,934.07	\$ 96,934.07	\$ 34,023.86	\$ 34,023.86	\$ 6,105.00	\$ 6,105.00	\$6,589.56	\$6,589.56	\$13,179.13			
Non-Major Sources																				
Area Sources																				
Asbestos/Demolition	746	2.00	32.00	32.00	64.00	64.00	0.0308	0.0308	\$ 90,066.11	\$ 90,066.11	\$ 31,613.20	\$ 31,613.20	\$ 6,105.00	\$ 6,105.00	\$3,931.83	\$3,931.83	\$7,863.65			
Stack Test Oversight																				
CEM Report Review/Audit	2427	6.00	6.00	6.00	36.00	36.00	0.0173	0.0173	\$ 104,440.91	\$ 104,440.91	\$ 36,658.76	\$ 36,658.76	\$ 6,105.00	\$ 6,105.00	\$2,547.77	\$2,547.77	\$5,095.55			

	0819	6.00	4.00	4.00	24.00	12.00	0.0115	0.0058	\$ 115,269.92	\$ 115,269.92	\$	40,459.74	\$	40,459.74	\$	6,105.00	\$	6,105.00	\$1,867.32	\$933.66	\$2,800.98
	2300	6.00	6.00	6.00	36.00	36.00	0.0173	0.0173	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$2,547.77	\$2,547.77	\$5,095.55
	3310	6.00	3.00	3.00	18.00	18.00	0.0087	0.0087	\$ 115,269.92	\$ 115,269.92	\$	40,459.74	\$	40,459.74	\$	6,105.00	\$	6,105.00	\$1,400.49	\$1,400.49	\$2,800.98
	0817	6.00	6.00	6.00	36.00	36.00	0.0173	0.0173	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$2,547.77	\$2,547.77	\$5,095.55
	3309	6.00	3.00	3.00	18.00	18.00	0.0087	0.0087	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$1,273.89	\$1,273.89	\$2,547.77
	2353	6.00	3.00	3.00	18.00	18.00	0.0087	0.0087	\$ 96,934.07	\$ 96,934.07	\$	34,023.86	\$	34,023.86	\$	6,105.00	\$	6,105.00	\$1,186.12	\$1,186.12	\$2,372.24
Review Month Emiss. Repts.	2427	8.00	24.00	24.00	192.00	192.00	0.0923	0.0923	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$13,588.12	\$13,588.12	\$27,176.25
	0819	8.00	12.00	12.00	96.00	96.00	0.0462	0.0462	\$ 115,269.92	\$ 115,269.92	\$	40,459.74	\$	40,459.74	\$	6,105.00	\$	6,105.00	\$7,469.29	\$7,469.29	\$14,938.58
	2300	8.00	24.00	24.00	192.00	192.00	0.0923	0.0923	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$13,588.12	\$13,588.12	\$27,176.25
	3310	8.00	12.00	12.00	96.00	96.00	0.0462	0.0462	\$ 115,269.92	\$ 115,269.92	\$	40,459.74	\$	40,459.74	\$	6,105.00	\$	6,105.00	\$7,469.29	\$7,469.29	\$14,938.58
	0817	8.00	12.00	12.00	96.00	96.00	0.0462	0.0462	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$6,794.06	\$6,794.06	\$13,588.12
	2426	1.00	108.00	108.00	108.00	108.00	0.0519	0.0519	\$ 66,954.62	\$ 66,954.62	\$	23,501.07	\$	23,501.07	\$	6,105.00	\$	6,105.00	\$5,013.73	\$5,013.73	\$10,027.46
	3309	8.00	12.00	12.00	96.00	96.00	0.0462	0.0462	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$6,794.06	\$6,794.06	\$13,588.12
	2353	8.00	12.00	12.00	96.00	96.00	0.0462	0.0462	\$ 96,934.07	\$ 96,934.07	\$	34,023.86	\$	34,023.86	\$	6,105.00	\$	6,105.00	\$6,325.98	\$6,325.98	\$12,651.96
Review Excess Emiss. Rpts.	2427	8.00	5.00	5.00	40.00	40.00	0.0192	0.0192	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$2,830.86	\$2,830.86	\$5,661.72
	0819	8.00	2.00	2.00	16.00	16.00	0.0077	0.0077	\$ 115,269.92	\$ 115,269.92	\$	40,459.74	\$	40,459.74	\$	6,105.00	\$	6,105.00	\$1,244.88	\$1,244.88	\$2,489.76
	2300	8.00	10.00	10.00	80.00	80.00	0.0385	0.0385	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$5,661.72	\$5,661.72	\$11,323.44
	3310	8.00	6.00	6.00	48.00	48.00	0.0231	0.0231	\$ 115,269.92	\$ 115,269.92	\$	40,459.74	\$	40,459.74	\$	6,105.00	\$	6,105.00	\$3,734.65	\$3,734.65	\$7,469.29
	3309	8.00	2.00	2.00	16.00	16.00	0.0077	0.0077	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$1,132.34	\$1,132.34	\$2,264.69
	817	8.00	2.00	2.00	16.00	16.00	0.0077	0.0077	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$1,132.34	\$1,132.34	\$2,264.69
	2353	8.00	2.00	2.00	16.00	16.00	0.0077	0.0077	\$ 96,934.07	\$ 96,934.07	\$	34,023.86	\$	34,023.86	\$	6,105.00	\$	6,105.00	\$1,054.33	\$1,054.33	\$2,108.66
Review Annual Compl. Cert.	2427	9.00	2.00	2.00	18.00	18.00	0.0087	0.0087	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$1,273.89	\$1,273.89	\$2,547.77
	0819	9.00	1.00	1.00	9.00	9.00	0.0043	0.0043	\$ 115,269.92	\$ 115,269.92	\$	40,459.74	\$	40,459.74	\$	6,105.00	\$	6,105.00	\$700.25	\$700.25	\$1,400.49
	2300	9.00	2.00	2.00	18.00	18.00	0.0087	0.0087	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$1,273.89	\$1,273.89	\$2,547.77
	3310	9.00	1.00	1.00	9.00	9.00	0.0043	0.0043	\$ 115,269.92	\$ 115,269.92	\$	40,459.74	\$	40,459.74	\$	6,105.00	\$	6,105.00	\$700.25	\$700.25	\$1,400.49
	0817	9.00	1.00	1.00	9.00	9.00	0.0043	0.0043	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$636.94	\$636.94	\$1,273.89
	2426	2.00	9.00	9.00	18.00	18.00	0.0087	0.0087	\$ 66,954.62	\$ 66,954.62	\$	23,501.07	\$	23,501.07	\$	6,105.00	\$	6,105.00	\$835.62	\$835.62	\$1,671.24
	2353	9.00	1.00	1.00	9.00	9.00	0.0043	0.0043	\$ 96,934.07	\$ 96,934.07	\$	34,023.86	\$	34,023.86	\$	6,105.00	\$	6,105.00	\$593.06	\$593.06	\$1,186.12
	3309	9.00	1.00	1.00	9.00	9.00	0.0043	0.0043	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$636.94	\$636.94	\$1,273.89
Complaint Investigation																					
Initial Response	2427	4.00	8.00	8.00	32.00	32.00	0.0154	0.0154	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$2,264.69	\$2,264.69	\$4,529.37
	2300	4.00	24.00	24.00	96.00	96.00	0.0462	0.0462	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$6,794.06	\$6,794.06	\$13,588.12
	0817	4.00	6.00	6.00	24.00	24.00	0.0115	0.0115	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$1,698.52	\$1,698.52	\$3,397.03
	3309	4.00	6.00	6.00	24.00	24.00	0.0115	0.0115	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$1,698.52	\$1,698.52	\$3,397.03
	3310	4.00	8.00	8.00	32.00	32.00	0.0154	0.0154	\$ 115,269.92	\$ 115,269.92	\$	40,459.74	\$	40,459.74	\$	6,105.00	\$	6,105.00	\$2,489.76	\$2,489.76	\$4,979.53
	2353	4.00	12.00	12.00	48.00	48.00	0.0231	0.0231	\$ 96,934.07	\$ 96,934.07	\$	34,023.86	\$	34,023.86	\$	6,105.00	\$	6,105.00	\$3,162.99	\$3,162.99	\$6,325.98
	819	4.00	8.00	8.00	32.00	32.00	0.0154	0.0154	\$ 115,269.92	\$ 115,269.92	\$	40,459.74	\$	40,459.74	\$	6,105.00	\$	6,105.00	\$2,489.76	\$2,489.76	\$4,979.53
Field Response	2427	8.00	4.00	4.00	32.00	32.00	0.0154	0.0154	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$2,264.69	\$2,264.69	\$4,529.37
	0819	8.00	2.00	2.00	16.00	16.00	0.0077	0.0077	\$ 115,269.92	\$ 115,269.92	\$	40,459.74	\$	40,459.74	\$	6,105.00	\$	6,105.00	\$1,244.88	\$1,244.88	\$2,489.76
	2300	8.00	6.00	6.00	48.00	48.00	0.0231	0.0231	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$3,397.03	\$3,397.03	\$6,794.06
	3309	8.00	2.00	2.00	16.00	16.00	0.0077	0.0077	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$1,132.34	\$1,132.34	\$2,264.69
	0817	8.00	2.00	2.00	16.00	16.00	0.0077	0.0077	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$1,132.34	\$1,132.34	\$2,264.69
	3310	8.00	2.00	2.00	16.00	16.00	0.0077	0.0077	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$1,132.34	\$1,132.34	\$2,264.69
	2353	8.00	4.00	4.00	32.00	32.00	0.0154	0.0154	\$ 96,934.07	\$ 96,934.07	\$	34,023.86	\$	34,023.86	\$	6,105.00	\$	6,105.00	\$2,108.66	\$2,108.66	\$4,217.32
Followup	2427	4.00	8.00	8.00	32.00	32.00	0.0154	0.0154	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$2,264.69	\$2,264.69	\$4,529.37
	0819	4.00	8.00	8.00	32.00	32.00	0.0154	0.0154	\$ 115,269.92	\$ 115,269.92	\$	40,459.74	\$	40,459.74	\$	6,105.00	\$	6,105.00	\$2,489.76	\$2,489.76	\$4,979.53
	2300	4.00	8.00	8.00	32.00	32.00	0.0154	0.0154	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$2,264.69	\$2,264.69	\$4,529.37
	3310	4.00	8.00	8.00	32.00	32.00	0.0154	0.0154	\$ 115,269.92	\$ 115,269.92	\$	40,459.74	\$	40,459.74	\$	6,105.00	\$	6,105.00	\$2,489.76	\$2,489.76	\$4,979.53
	0817	4.00	2.00	2.00	8.00	8.00	0.0038	0.0038	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$566.17	\$566.17	\$1,132.34
	3309	4.00	2.00	2.00	8.00	8.00	0.0038	0.0038	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$566.17	\$566.17	\$1,132.34
	2353	4.00	8.00	8.00	32.00	32.00	0.0154	0.0154	\$ 96,934.07	\$ 96,934.07	\$	34,023.86	\$	34,023.86	\$	6,105.00	\$	6,105.00	\$2,108.66	\$2,108.66	\$4,217.32
Administrative Enforcement																					
NOV Processing	2427	40.00	2.00	2.00	80.00	80.00	0.0385	0.0385	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$5,661.72	\$5,661.72	\$11,323.44
	0819	40.00	1.00	1.00	40.00	40.00	0.0192	0.0192	\$ 115,269.92	\$ 115,269.92	\$	40,459.74	\$	40,459.74	\$	6,105.00	\$	6,105.00	\$3,112.21	\$3,112.21	\$6,224.41
	2300	40.00	2.00	2.00	80.00	80.00	0.0385</														

>Prg. Rept-Airs/AFS												
>Ecology Performance Audits-HPV												
Total	0.00	0.00	0.0000	0.0000			\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

>Acid Rain																						
>New 112 R. / Plans																						
Local Program Deleg.																						
Review Prog. Submittal																						
>Followup																						
>Interagency Agree	2871	4.00	2.00	2.00	8.00	8.00	0.0038	0.0038	\$ 115,269.92	\$ 115,269.92	\$	40,459.74	\$	40,459.74	\$	6,105.00	\$	6,105.00	\$622.44	\$622.44	\$1,244.88	
	2162	2.00	1.00	1.00	2.00	2.00	0.0010	0.0010	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$141.54	\$141.54	\$283.09	
Federal Prog. Delegation																						
>Prog. Deleg. Package																						
>Followup																						
Interagency Agreement																						
>Emiss. Inventory Update	2871	10.00	2.00	2.00	20.00	20.00	0.0096	0.0096	\$ 115,269.92	\$ 115,269.92	\$	40,459.74	\$	40,459.74	\$	6,105.00	\$	6,105.00	\$1,556.10	\$1,556.10	\$3,112.21	
Engineering Support	2162	10.00	2.00	2.00	20.00	20.00	0.0096	0.0096	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$1,415.43	\$1,415.43	\$2,830.86	
Engineering Development																						
Total					50.00	50.00	0.0240	0.0240												\$3,735.52	\$3,735.52	\$7,471.03
																				\$0.00	\$0.00	

C. Permit Processing

Activity	Position #	Hours Per Task	Tasks/Yr FY14	Tasks/Yr FY15	Hours FY14	Hours FY15	FTE FY14	FTE FY15	FY14 Salary & Benefits	FY15 Salary & Benefits	FY14 Indirect Cost Cost	FY15 Indirect Cost Cost	FY14 Goods/Serv. & Travel	FY15 Goods/Serv. & Travel	Cost FY14	Cost FY15	Biennial Total	FY14 D&O	FY15 D&O			
Permit Application Review																						
Preapplication Assistance																						
Permit Renewals	2871		0	0	0.00	0.00	0.0000	0.0000	\$ 115,269.92	\$ 115,269.92	\$	40,459.74	\$	40,459.74	\$	6,105.00	\$	6,105.00	\$0.00	\$0.00	\$0.00	
	2162		0	0	0.00	0.00	0.0000	0.0000	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$0.00	\$0.00	\$0.00	
Major Sources - Other																						
Non-Major Sources																						
Prepare Draft Permit	2871	120	0	0	0.00	0.00	0.0000	0.0000	\$ 115,269.92	\$ 115,269.92	\$	40,459.74	\$	40,459.74	\$	6,105.00	\$	6,105.00	\$0.00	\$0.00	\$0.00	
	2162	120	0	0	0.00	0.00	0.0000	0.0000	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$0.00	\$0.00	\$0.00	
Public Meetings	2871	24	0	1	0.00	24.00	0.0000	0.0115	\$ 115,269.92	\$ 115,269.92	\$	40,459.74	\$	40,459.74	\$	6,105.00	\$	6,105.00	\$0.00	\$0.00	\$0.00	
	2162	24	0	1	0.00	24.00	0.0000	0.0115	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$0.00	\$0.00	\$0.00	
Final Permits/Comments	2871	80	0	1	0.00	80.00	0.0000	0.0385	\$ 115,269.92	\$ 115,269.92	\$	40,459.74	\$	40,459.74	\$	6,105.00	\$	6,105.00	\$0.00	\$0.00	\$0.00	
	2162	80	0	1	0.00	80.00	0.0000	0.0385	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$0.00	\$1,415.43	\$1,415.43	
Permit Modifications																						
Significant	2871	120.00	0.00	1.00	0.00	120.00	0.0000	0.0577	\$ 115,269.92	\$ 115,269.92	\$	40,459.74	\$	40,459.74	\$	6,105.00	\$	6,105.00	\$0.00	\$9,336.62	\$9,336.62	
	2162	120.00	0.00	1.00	0.00	120.00	0.0000	0.0577	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$0.00	\$8,492.58	\$8,492.58	
Minor	2871	80.00	3.00	3.00	240.00	240.00	0.1154	0.1154	\$ 115,269.92	\$ 115,269.92	\$	40,459.74	\$	40,459.74	\$	6,105.00	\$	6,105.00	\$18,673.23	\$18,673.23	\$37,346.46	
	2162	60.00	3.00	3.00	180.00	180.00	0.0865	0.0865	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$12,738.87	\$12,738.87	\$25,477.73	
	1192	20.00	3.00	3.00	60.00	60.00	0.0288	0.0288	\$ 75,723.25	\$ 75,723.25	\$	26,578.86	\$	26,578.86	\$	6,105.00	\$	6,105.00	\$3,127.13	\$3,127.13	\$6,254.26	
Admin. Permit Amend.	2871	20.00	2.00	3.00	40.00	60.00	0.0192	0.0288	\$ 115,269.92	\$ 115,269.92	\$	40,459.74	\$	40,459.74	\$	6,105.00	\$	6,105.00	\$3,112.21	\$4,668.31	\$7,780.51	
	2162	20.00	2.00	3.00	40.00	60.00	0.0192	0.0288	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$2,830.86	\$4,246.29	\$7,077.15	
Permit Reopening																						
Early Reduction Reviews																						
Operational Flex. Reviews																						
Permit Appeals																						
EPA Oversight/reporting	2871	20	1	1	20.00	20.00	0.0096	0.0096	\$ 115,269.92	\$ 115,269.92	\$	40,459.74	\$	40,459.74	\$	6,105.00	\$	6,105.00	\$1,556.10	\$1,556.10	\$3,112.21	
>Ecology performance audits																						
HPV	2162	20	1	1	20.00	20.00	0.0096	0.0096	\$ 104,440.91	\$ 104,440.91	\$	36,658.76	\$	36,658.76	\$	6,105.00	\$	6,105.00	\$1,415.43	\$1,415.43	\$2,830.86	
Total					600.00	1088.00	0.2885	0.5231												\$43,453.82	\$65,669.97	\$109,123.79
																				\$0.00	\$0.00	

D. Permit Management

Activity	Position #	Hours Per Task	Tasks/Yr FY14	Tasks/Yr FY15	Hours FY14	Hours FY15	FTE FY14	FTE FY15	FY14 Salary & Benefits	FY15 Salary & Benefits	FY14 Indirect Cost Cost	FY15 Indirect Cost Cost	FY14 Goods/Serv. & Travel	FY15 Goods/Serv. & Travel	Cost FY14	Cost FY15	Biennial Total	FY14 D&O	FY15 D&O
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>Business Advisories Laws & Regulations Compliance Outreach Pollution Prevention Accidental Release Health & Environmental Effects Prog. Evaluation & Compliance >Business Liaison - Ombudsman >Compliance Advisory Panel >Program Effectiveness																			
Total		48.00	48.00	0.0231	0.0231										\$3,565.84	\$3,565.84	\$7,131.68	\$0.00	\$0.00

F. Outreach & Education

Activity	Position #	Hours	Tasks/Yr	Tasks/Yr	Hours	Hours	FTE	FTE	FY14 Salary & Benefits	FY15 Salary & Benefits	FY14 Indirect Cost	FY15 Indirect Cost	FY14 Goods/Serv. & Travel	FY15 Goods/Serv. & Travel	Cost FY14	Cost FY15	Biennial Total	FY14 D&O	FY15 D&O
Information/Outreach																			
General Info/Outreach	2114	20.00	2.00	2.00	40.00	40.00	0.0192	0.0192	\$ 66,954.62	\$ 66,954.62	\$ 23,501.07	\$ 23,501.07	\$ 6,105.00	\$ 6,105.00	\$1,856.94	\$1,856.94	\$3,713.87		
Permit Workshops	2114	20.00	1.00	1.00	20.00	20.00	0.0096	0.0096	\$ 66,954.62	\$ 66,954.62	\$ 23,501.07	\$ 23,501.07	\$ 6,105.00	\$ 6,105.00	\$928.47	\$928.47	\$1,856.94		
>Permit Register																			
>Fact Sheets																			
Total					60.00	60.00	0.0288	0.0288							\$2,785.40	\$2,785.40	\$5,570.81	\$0.00	\$0.00

G. Ambient Monitoring & Oversight

Activity	Position #	Hours	Tasks/Yr	Tasks/Yr	Hours	Hours	FTE	FTE	FY14 Salary & Benefits	FY15 Salary & Benefits	FY14 Indirect Cost	FY15 Indirect Cost	FY14 Goods/Serv. & Travel	FY15 Goods/Serv. & Travel	Cost FY14	Cost FY15	Biennial Total	FY14 D&O	FY15 D&O
Ambient Monitoring																			
> Monitoring																			
Local Program Oversight	2871	0.00	1.00	1.00	0.00	0.00	0.0000	0.0000	\$ 115,269.92	\$ 115,269.92	\$ 40,459.74	\$ 40,459.74	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00		
Coordination	2162	0.00	1.00	1.00	0.00	0.00	0.0000	0.0000	\$ 104,440.91	\$ 104,440.91	\$ 36,658.76	\$ 36,658.76	\$ 6,105.00	\$ 6,105.00	\$0.00	\$0.00	\$0.00		
>Local Performance Audits																			
> Routine Audits																			
Total					0.00	0.00	0.0000	0.0000							\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

>Acid Rain																		
>New 112 R. / Plans																		
Local Program Deleg.																		
Review Prog. Submittal																		
>Followup																		
>Interagency Agree																		
Federal Prog. Delegation																		
>Prog. Deleg. Package																		
>Followup																		
Interagency Agreement																		
>Emiss. Inventory Update																		
Engineering Support																		
Engineering Development																		
Total					0.00	0.00	0.0000	0.0000					\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

C. Permit Processing

Activity	Position #	Hours Per Task	Tasks/Yr FY14	Tasks/Yr FY15	Hours FY14	Hours FY15	FTE FY14	FTE FY15	FY14 Sal + Ben	FY15 Sal + Ben	FY14 Indirect Cost 0.2220	FY15 Indirect Cost 0.2220	Cost FY14	Cost FY15	Biennial Total	FY14 D&O	FY15 D&O
Permit Application Review																	
Preapplication Assistance																	
Permit Renewals																	
Major Sources - Other																	
Non-Major Sources																	
Prepare Draft Permit	HP2	2.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 94,723.20	\$ 98,030.40	\$ -	\$ -	\$0.00	\$0.00	\$0.00		
	HP3	5.00	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 102,024.00	\$ 105,580.80	\$ -	\$ -	\$0.00	\$0.00	\$0.00		
	HP4	0.50	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 112,590.40	\$ 116,542.40	\$ -	\$ -	\$0.00	\$0.00	\$0.00		
	AA3	2.50	0.00	0.00	0.00	0.00	0.0000	0.0000	\$ 53,705.60	\$ 55,577.60	\$ -	\$ -	\$0.00	\$0.00	\$0.00		
Public Meetings		0.00	1.00	1.00	0.00	0.00	0.0000	0.0000	\$ 102,024.00	\$ 105,580.80	\$ -	\$ -	\$0.00	\$0.00	\$0.00		
Final Permits/Comments	HP2	2.00	1.00	1.00	2.00	2.00	0.0010	0.0010	\$ 94,723.20	\$ 98,030.40	\$ 20.22	\$ 20.93	\$111.30	\$115.19	\$226.49		
	HP3	5.00	1.00	1.00	5.00	5.00	0.0024	0.0024	\$ 102,024.00	\$ 105,580.80	\$ 54.45	\$ 56.34	\$299.70	\$310.14	\$609.84		
	HP4	2.50	1.00	1.00	2.50	2.50	0.0012	0.0012	\$ 112,590.40	\$ 116,542.40	\$ 30.04	\$ 31.10	\$165.37	\$171.17	\$336.54		
	AA3	0.50	1.00	1.00	0.50	0.50	0.0002	0.0002	\$ 53,705.60	\$ 55,577.60	\$ 2.87	\$ 2.97	\$15.78	\$16.33	\$32.10		
Permit Modifications																	
Significant																	
Minor																	
Admin. Permit Amend.																	
Permit Reopening (incorporation)	HP2	4	1	1	4.00	4.00	0.0019	0.0019	\$ 94,723.20	\$ 98,030.40	\$ 40.44	\$ 41.85	\$222.60	\$230.37	\$452.97		
	HP3	4	1	1	4.00	4.00	0.0019	0.0019	\$ 102,024.00	\$ 105,580.80	\$ 43.56	\$ 45.07	\$239.76	\$248.11	\$487.87		
	HP4	0.5	1	1	0.50	0.50	0.0002	0.0002	\$ 112,590.40	\$ 116,542.40	\$ 6.01	\$ 6.22	\$33.07	\$34.23	\$67.31		
	AA3	1.5	1	1	1.50	1.50	0.0007	0.0007	\$ 53,705.60	\$ 55,577.60	\$ 8.60	\$ 8.90	\$47.33	\$48.98	\$96.31		
Early Reduction Reviews																	
Operational Flex. Reviews																	
Permit Appeals																	
Total					20.00	20.00	0.0096	0.0096					\$1,134.90	\$1,174.53	\$2,309.42	\$0.00	\$0.00

D. Permit Management

Activity	Position #	Hours Per Task	Tasks/Yr FY14	Tasks/Yr FY15	Hours FY14	Hours FY15	FTE FY14	FTE FY15	FY14 Sal + Ben	FY15 Sal + Ben	FY14 Indirect Cost 0.2220	FY15 Indirect Cost 0.2220	Cost FY14	Cost FY15	Biennial Total	FY14 D&O	FY15 D&O
Inspections																	
Major Sources																	
Non-Major Sources																	
Area Sources																	
Review NESHAP Report	HP2	8	1	1	8.00	8.00	0.0038	0.0038	\$ 94,723.20	\$ 98,030.40	\$ 80.88	\$ 83.70	\$445.20	\$460.74	\$905.94		

Permit Workshops																	
>Permit Register																	
>Fact Sheets																	
Total		0.00	0.00	0.0000	0.0000								\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

G. Ambient Monitoring & Oversight

Activity	Position #	Hours Per Task	Tasks/Yr FY14	Tasks/Yr FY15	Hours FY14	Hours FY15	FTE FY14	FTE FY15	FY14 Sal + Ben	FY15 Sal + Ben	FY14 Indirect Cost 0.2220	FY15 Indirect Cost 0.2220	Cost FY14	Cost FY15	Biennial Total	FY14 D&O	FY15 D&O
Ambient Monitoring																	
> Monitoring																	
Local Program Oversight																	
Coordination																	
>Local Performance Audits																	
> Routine Audits																	
EPA Oversight/Reporting																	
>Prg. Rept-Airs/AFS																	
>Ecology Performance Audits-HPV																	
Total		0.00	0.00	0.0000	0.0000								\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

**Dept. of Health (DOH)
Summary (Hanford)**

Activity	Hours FY14	Hours FY15	FTE FY14	FTE FY15	Cost FY14	Cost FY15	Biennial Total	FY14 D&O	FY15 D&O
A. Management & Support	74.00	74.00	0.0356	0.0356	\$3,199.07	\$3,310.70	\$6,509.78	\$0.00	\$0.00
B. Delegation & Regulation	0.00	0.00	0.0000	0.0000	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
C. Permit Processing	80.00	80.00	0.0385	0.0385	\$4,539.58	\$4,698.10	\$9,462.43	\$0.00	\$0.00
D. Permit Management	370.00	370.00	0.1779	0.1779	\$20,677.69	\$21,399.58	\$43,132.41	\$0.00	\$0.00
E. Technical Assistance	0.00	0.00	0.0000	0.0000	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
F. Outreach & Education	0.00	0.00	0.0000	0.0000	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
G. Ambient Monitoring & Oversight	0.00	0.00	0.0000	0.0000	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Total	524.00	524.00	0.2520	0.2520	\$28,416.35	\$29,408.39	\$59,104.62	\$0.00	\$0.00

A. Management & Support

Activity	Position #	Hours Per Task	Tasks/Yr FY14	Tasks/Yr FY15	Hours FY14	Hours FY15	FTE FY14	FTE FY15	FY14 Sal + Ben	FY15 Sal + Ben	FY14 Indirect Cost 0.2220	FY15 Indirect Cost 0.2220	Cost FY14	Cost FY15	Biennial Total	FY14 D&O	FY15 D&O
Program Administration																	
Clerical	AA3	0.00	1.00	1.00	0.00	0.00	0.0000	0.0000	\$ 53,705.60	\$ 55,577.60	\$ -	\$ -	\$0.00	\$0.00	\$0.00		
Management	HP4	2.00	1.00	1.00	2.00	2.00	0.0010	0.0010	\$ 112,590.40	\$ 116,542.40	\$ 24.03	\$ 24.88	\$132.29	\$136.94	\$269.23		
Training	HP2	5.50	1.00	1.00	5.50	5.50	0.0026	0.0026	\$ 94,723.20	\$ 98,030.40	\$ 55.60	\$ 57.55	\$306.07	\$316.76	\$622.84		
HP3	HP3	5.50	1.00	1.00	5.50	5.50	0.0026	0.0026	\$ 102,024.00	\$ 105,580.80	\$ 59.89	\$ 61.98	\$329.67	\$341.16	\$670.82		
>Permit Eng. Workshops	HP2	5.50	1.00	1.00	5.50	5.50	0.0026	0.0026	\$ 94,723.20	\$ 98,030.40	\$ 55.60	\$ 57.55	\$306.07	\$316.76	\$622.84		
HP3	HP3	5.50	1.00	1.00	5.50	5.50	0.0026	0.0026	\$ 102,024.00	\$ 105,580.80	\$ 59.89	\$ 61.98	\$329.67	\$341.16	\$670.82		
Data Management																	
>General Support																	
>Compliance Information																	
>Emission Inventory																	
Fee Administration																	
>Fee Determination																	
>Collection/Appeals																	
>Allocation Review																	
>Tracking																	
>Annual Report																	
>Time Accounting	AA3	42.50	1.00	1.00	42.50	42.50	0.0204	0.0204	\$ 53,705.60	\$ 55,577.60	\$ 243.61	\$ 252.10	\$1,340.96	\$1,387.70	\$2,728.66		
HP2	HP2	2.50	1.00	1.00	2.50	2.50	0.0012	0.0012	\$ 94,723.20	\$ 98,030.40	\$ 25.27	\$ 26.16	\$139.12	\$143.98	\$283.11		
HP3	HP3	2.50	1.00	1.00	2.50	2.50	0.0012	0.0012	\$ 102,024.00	\$ 105,580.80	\$ 27.22	\$ 28.17	\$149.85	\$155.07	\$304.92		
HP4	HP4	2.50	1.00	1.00	2.50	2.50	0.0012	0.0012	\$ 112,590.40	\$ 116,542.40	\$ 30.04	\$ 31.10	\$165.37	\$171.17	\$336.54		
Support																	
Supervision											\$ -	\$ -	\$0.00	\$ -			
>Clerical																	
>AFRS Support																	
Total					74.00	74.00	0.0356	0.0356					\$3,199.07	\$3,310.70	\$6,509.78	\$0.00	\$0.00

B. Delegation & Regulation

Activity	Position #	Hours Per Task	Tasks/Yr FY14	Tasks/Yr FY15	Hours FY14	Hours FY15	FTE FY14	FTE FY15	FY14 Sal + Ben	FY15 Sal + Ben	FY14 Indirect Cost 0.2220	FY15 Indirect Cost 0.2220	Cost FY14	Cost FY15	Biennial Total	FY14 D&O	FY15 D&O
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>Trade Association Coord. and Oversight																		
>Industry Specific Plans cross/multi-media general permit work																		
Source Environmental Audits																		
>Business Advisories Laws & Regulations Compliance Outreach																		
Pollution Prevention Accidental Release Health & Environmental Effects																		
Prog. Evaluation & Compliance																		
>Business Liaison - Ombudsman																		
>Compliance Advisory Panel																		
>Program Effectiveness																		
Total					0.00	0.00	0.0000	0.0000					\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

F. Outreach & Education

Activity	Position #	Hours	Tasks/Yr	Tasks/Yr	Hours	Hours	FTE	FTE	FY14	FY15	FY14 Indirect Cost	FY15 Indirect Cost	Cost	Cost	Biennial	FY14	FY15
		Per Task	FY14	FY15	FY14	FY15	FY14	FY15	Sal + Ben	Sal + Ben	0.2220	0.2220	FY14	FY15	Total	D&O	D&O
Information/Outreach																	
General Info/Outreach																	
Permit Workshops																	
>Permit Register																	
>Fact Sheets																	
Total					0.00	0.00	0.0000	0.0000					\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

G. Ambient Monitoring & Oversight

Activity	Position #	Hours	Tasks/Yr	Tasks/Yr	Hours	Hours	FTE	FTE	FY14	FY15	FY14 Indirect Cost	FY15 Indirect Cost	Cost	Cost	Biennial	FY14	FY15
		Per Task	FY14	FY15	FY14	FY15	FY14	FY15	Sal + Ben	Sal + Ben	0.2220	0.2220	FY14	FY15	Total	D&O	D&O
Ambient Monitoring																	
> Monitoring																	
Local Program Oversight																	
Coordination																	
>Local Performance Audits																	
> Routine Audits																	
EPA Oversight/Reporting																	
>Prg. Rept-Airs/AFS																	
>Ecology Performance Audits-HPV																	
Total					0.00	0.00	0.0000	0.0000					\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

Overall Summary FY14

	Program Management (PM)		Financial (FIN)		Technical Services (TSS)		Science & Engineering (SES)		Program Deveopment (PDS)		Eastern Region (ERO)		Central Region (CRO)		Industrial Section (IND)		Nuclear Waste		DOH (WSU)		DOH (Hanford)	
	D&O	Cost	D&O	Cost	D&O	Cost	D&O	Cost	D&O	Cost	D&O	Cost	D&O	Cost	D&O	Cost	D&O	Cost	D&O	Cost	D&O	Cost
A. Management & Support	\$0.00	\$6,782.52	\$0.00	\$8,574.07	\$10,350.55	\$54,696.09	\$9,884.29	\$20,215.19	\$0.00	\$2,302.90	\$0.00	\$17,669.85	\$0.00	\$67,798.64	\$0.00	\$168,117.64	\$0.00	\$34,362.36	\$0.00	\$195.69	\$0.00	\$3,199.07
B. Delegation & Regulation	\$0.00	\$0.00	\$0.00	\$0.00	\$28,170.56	\$30,731.52	\$1,769.29	\$1,769.29	\$96,515.08	\$96,515.08	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,735.52	\$0.00	\$0.00	\$0.00	\$0.00
C. Permit Processing	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$61,676.44	\$0.00	\$89,487.46	\$0.00	\$106,346.69	\$0.00	\$43,453.82	\$0.00	\$1,134.90	\$0.00	\$4,539.58	
D. Permit Management	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$113,114.07	\$0.00	\$39,838.54	\$0.00	\$244,006.95	\$0.00	\$93,160.20	\$0.00	\$1,398.81	\$0.00	\$20,677.69	
E. Technical Assistance	\$0.00	\$0.00	\$0.00	\$0.00	\$25,609.60	\$25,609.60	\$14,827.98	\$18,501.41	\$5,025.09	\$5,025.09	\$0.00	\$50,794.10	\$0.00	\$32,569.47	\$0.00	\$0.00	\$0.00	\$3,565.84	\$0.00	\$0.00	\$0.00	\$0.00
F. Education & Outreach	\$0.00	\$0.00	\$0.00	\$0.00	\$1,772.19	\$1,772.19	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,785.40	\$0.00	\$0.00	\$0.00	\$0.00
G. Ambient Monitoring & Oversight	\$0.00	\$0.00	\$0.00	\$0.00	\$23,262.05	\$28,383.97	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Audit Costs					\$25,000.00																	
Total	\$0.00	\$6,782.52	\$0.00	\$8,574.07	\$114,164.94	\$141,193.36	\$26,481.55	\$40,485.89	\$101,540.17	\$103,843.07	\$0.00	\$243,254.46	\$0.00	\$229,694.11	\$0.00	\$518,471.28	\$0.00	\$181,063.14	\$0.00	\$2,729.40	\$0.00	\$28,416.35

Total D&O \$242,186.66
 Total Cost only 2014 \$1,504,507.64

Overall Summary FY15

	Program Management (PM)		Financial (FIN)		Technical Services (TSS)		Science & Engineering (SES)		Program Development (PDS)		Eastern Region (ERO)		Central Region (CRO)		Industrial Section (IND)		Nuclear Waste		DOH(WSU)		DOH(Hanford)	
	D&O	Cost	D&O	Cost	D&O	Cost	D&O	Cost	D&O	Cost	D&O	Cost	D&O	Cost	D&O	Cost	D&O	Cost	D&O	Cost	D&O	Cost
A. Management & Support	\$0.00	\$6,782.52	\$0.00	\$8,574.07	\$10,350.55	\$54,696.09	\$9,884.29	\$20,215.19	\$0.00	\$2,302.90	\$0.00	\$17,669.85	\$0.00	\$50,331.27	\$0.00	\$168,117.64	\$0.00	\$ 34,362.36	\$0.00	\$202.52	\$0.00	\$3,310.70
B. Delegation & Regulation	\$0.00	\$0.00	\$0.00	\$0.00	\$28,170.56	\$30,731.52	\$1,769.29	\$1,769.29	\$54,899.48	\$54,899.48	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$ 3,735.52	\$0.00	\$0.00	\$0.00	\$0.00
C. Permit Processing	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$31,905.29	\$0.00	\$25,441.56	\$0.00	\$204,645.71	\$0.00	\$ 65,669.97	\$0.00	\$1,174.53	\$0.00	\$4,698.10	
D. Permit Management	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$113,114.07	\$0.00	\$41,357.84	\$0.00	\$243,073.29	\$0.00	\$ 93,118.00	\$0.00	\$1,447.65	\$0.00	\$21,399.58	
E. Technical Assistance	\$0.00	\$0.00	\$0.00	\$0.00	\$25,609.60	\$25,609.60	\$14,827.98	\$18,501.41	\$5,025.09	\$5,025.09	\$0.00	\$50,794.10	\$0.00	\$32,569.47	\$0.00	\$0.00	\$0.00	\$ 3,565.84	\$0.00	\$0.00	\$0.00	\$0.00
F. Education & Outreach	\$0.00	\$0.00	\$0.00	\$0.00	\$1,772.19	\$1,772.19	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$ 2,785.40	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
G. Ambient Monitoring & Oversight	\$0.00	\$0.00	\$0.00	\$0.00	\$23,262.05	\$24,115.70	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$ -	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Audit Costs					\$ 5,000.00																	
Total	\$0.00	\$6,782.52	\$0.00	\$8,574.07	\$94,164.94	\$136,925.10	\$26,481.55	\$40,485.89	\$59,924.57	\$62,227.48	\$0.00	\$213,483.30	\$0.00	\$149,700.14	\$0.00	\$615,836.64	\$0.00	\$ 203,237.09	\$0.00	\$ 2,824.69	\$0.00	\$ 29,408.39

Total D&O \$180,571.07
 Cost only 2015 \$1,469,485.29

FY14 Budget \$1,504,507.64
 FY14 Total D&O \$242,186.66
 Local's D&O \$188,791.18
 Budget (with ECY D&O) \$1,315,716.46

Total to be Collected \$ 1,315,716.46
 Flat Component (33% of Total) \$ 438,572.11 Total # of Sources = 28 \$ 15,663.29 (charge per facility)
 Complexity Component (33% of Total) \$ 438,572.11 Total Complexity pts = 66 \$ 6,645.03 (charge per complexity point)
 Emissions Component (33% of Total) \$ 438,572.11 Total Emissions = 21790 \$ 20.13 (charge per emission unit)

Agcy	FIPS	Source	Business Mailing Name	Mailing City	PM10 TPY	SO2 TPY	NOX TPY	VOC TPY	Comp. Points	Comp. Squared	Fee/Comp. Pts	Comp. Fee	Total Emiss.	Fee/Emiss.	Emiss. Fee	Flat Fee	Total Bill	Rebate	Total Fee FYs 12
A	65	6	Stimson Lumber Co Arden	Colville	4	0	1	15	1	1	\$6,645.03	\$6,645.03	20	20.13	\$402.54	\$15,663.29	\$22,710.86	\$0.00	\$22,710.86
A			Ponderay Newsprint Company	Usk	4	13	27	142	1	1	\$6,645.03	\$6,645.03	186	20.13	\$3,749.65	\$15,663.29	\$26,057.97	\$0.00	\$26,057.97
A	65	8	Boise Cascade Plywood	Kettle Falls	27	3	35	36	1	1	\$6,645.03	\$6,645.03	101	20.13	\$2,032.82	\$15,663.29	\$24,341.14	\$0.00	\$24,341.14
A	65	10	Boise Cascade Lumber	Kettle Falls	8	0	18	37	1	1	\$6,645.03	\$6,645.03	63	20.13	\$1,268.00	\$15,663.29	\$23,576.32	\$0.00	\$23,576.32
A	65	12	Vaagen Brothers Lumber Inc	Colville	20	4	49	47	1	1	\$6,645.03	\$6,645.03	120	20.13	\$2,415.23	\$15,663.29	\$24,723.55	\$0.00	\$24,723.55
A	65	33	Avista Utilities Kettle Falls	Spokane	20	3	369	12	1	1	\$6,645.03	\$6,645.03	404	20.13	\$8,131.28	\$15,663.29	\$30,439.61	\$0.00	\$30,439.61
A	71	25	Pacific Gas Transmission Co Station 8 (Walla Walla)	Portland	0	2	72	6	1	1	\$6,645.03	\$6,645.03	80	20.13	\$1,610.16	\$15,663.29	\$23,918.48	\$0.00	\$23,918.48
A	71	26	Pacific Gas Transmission Co Station 7 (Starbuck)	Portland	0	0	13	1	1	1	\$6,645.03	\$6,645.03	14	20.13	\$281.78	\$15,663.29	\$22,590.10	\$0.00	\$22,590.10
A	75	8	Washington State University	Pullman	3	0	8	0	1	1	\$6,645.03	\$6,645.03	11	20.13	\$221.40	\$15,663.29	\$22,529.72	\$0.00	\$22,529.72
A	75	201	Guy Bennett Lumber	Clarkston	0	0	0	0	1	1	\$6,645.03	\$6,645.03	0	20.13	\$0.00	\$15,663.29	\$22,308.32	\$0.00	\$22,308.32
A			Kinross	Ferry	0	0	0	0	1	1	\$6,645.03	\$6,645.03	0	20.13	\$0.00	\$15,663.29	\$22,308.32	\$0.00	\$22,308.32
A	25	167	REC	Grant	44	1	51	7	1	1	\$6,645.03	\$6,645.03	103	20.13	\$2,073.08	\$15,663.29	\$24,381.40	\$0.00	\$24,381.40
B	39	66	Goldendale Generating Station	Goldendale	3	1	21	3	1	1	\$6,645.03	\$6,645.03	28	20.13	\$563.55	\$15,663.29	\$22,871.88	\$0.00	\$22,871.88
B	17	37	Greater Wenatchee Regional Landfill	Wenatchee	6	4	9	5	1	1	\$6,645.03	\$6,645.03	24	20.13	\$483.05	\$15,663.29	\$22,791.37	\$0.00	\$22,791.37
B	39	2	SDS Lumber Co Bingen	Bingen	32	6	47	58	1	1	\$6,645.03	\$6,645.03	143	20.13	\$2,878.15	\$15,663.29	\$25,186.47	\$0.00	\$25,186.47
B	39	24	Regional Disposal Co.	Roosevelt	64	13	9	130	1	1	\$6,645.03	\$6,645.03	216	20.13	\$4,347.42	\$15,663.29	\$26,655.74	\$0.00	\$26,655.74
B	39	65	Roosevelt Landfill Biogas Project No. 1	Goldendale	7	0	77	4	1	1	\$6,645.03	\$6,645.03	88	20.13	\$1,771.17	\$15,663.29	\$24,079.49	\$0.00	\$24,079.49
M	5	9	US Energy Department	Richland	0	0	10	9	3	9	\$6,645.03	\$59,805.29	19	20.13	\$382.41	\$15,663.29	\$75,850.99	\$0.00	\$75,850.99
S	7	1	ALCOA Inc. Wenatchee Works	Malaga	546	2,906	63	266	2	4	\$6,645.03	\$26,580.13	3,781	20.13	\$76,099.97	\$15,663.29	\$118,343.39	\$0.00	\$118,343.39
S	11	5	Georgia-Pacific Consumer Products (Camas), LLC	Camas	145	19	508	128	2	4	\$6,645.03	\$26,580.13	800	20.13	\$16,101.55	\$15,663.29	\$58,344.97	\$0.00	\$58,344.97
S	15	2	Longview Fibre Paper and Packaging, Inc	Longview	81	202	1,372	219	2	4	\$6,645.03	\$26,580.13	1,874	20.13	\$37,717.89	\$15,663.29	\$79,961.31	\$0.00	\$79,961.31
S	15	3	Weyerhaeuser Longview	Longview	76	582	2,137	422	2	4	\$6,645.03	\$26,580.13	3,217	20.13	\$64,748.37	\$15,663.29	\$106,991.79	\$0.00	\$106,991.79
S	27	1	Cosmo Specialty Fibers	Cosmopolis	272	214	12	18	2	4	\$6,645.03	\$26,580.13	516	20.13	\$10,385.50	\$15,663.29	\$52,628.92	\$0.00	\$52,628.92
S	31	1	Port Townsend Paper	Port Townsend	310	150	473	44	2	4	\$6,645.03	\$26,580.13	977	20.13	\$19,664.02	\$15,663.29	\$61,907.44	\$0.00	\$61,907.44
S	53	8	Simpson Tacoma Kraft Co.	Tacoma	97	349	945	77	2	4	\$6,645.03	\$26,580.13	1,468	20.13	\$29,546.35	\$15,663.29	\$71,789.77	\$0.00	\$71,789.77
S	61	2	Kimberly Clark Corp.	Everett	0	0	0	0	2	4	\$6,645.03	\$26,580.13	0	20.13	\$0.00	\$15,663.29	\$42,243.42	\$0.00	\$42,243.42
S	71	3	Boise Cascade Paper	Wallula	103	793	860	142	2	4	\$6,645.03	\$26,580.13	1,898	20.13	\$38,200.94	\$15,663.29	\$80,444.35	\$0.00	\$80,444.35
S	73	1	INTALCO Aluminum	Ferndale	679	4,538	152	270	2	4	\$6,645.03	\$26,580.13	5,639	20.13	\$113,495.83	\$15,663.29	\$155,739.25	\$0.00	\$155,739.25
			Total		2,551	9,803	7,338	2,098		66		438,572.11	21,790		438,572.11	438,572.11	1,315,716.33	\$0.00	1,315,716.33

\$1,315,716.33

AOP Fee Calculation FY15

FY15 Budget \$1,469,485.29
 Total FY15 D&O \$180,571.07
 Local's D&O \$140,760.12
 Budget (with ECY D&O) \$1,328,725.17

Total to be Collected \$ 1,328,725.17
 Flat Component (33% of Total) \$ 442,908.35 Total # of Sources = 28 \$ 15,818.16 (charge per facility)
 Complexity Component (33% of Total) \$ 442,908.35 Total Complexity pts = 66 \$ 6,710.73 (charge per complexity point)
 Emissions Component (33% of Total) \$ 442,908.35 Total Emissions = 21790 \$ 20.33 (charge per emission unit)

Agcy	FIPS	Source	Business Mailing Name	Mailing City	A PM10 TPY	B SO2 TPY	C NOX TPY	D VOC TPY	E Comp. Points	E(2) Comp. Squared	F Fee/Comp. Pts	G=(E(2)*F) Comp. Fee	H=(A+B+C+D) Total Emiss.	I Fee/Emiss.	J=(H*I) Emiss. Fee	K Flat Fee	L=(G+J+K) Total Bill	Rebate	Total Fee FYs 11
A	65	6	Stimson Lumber Co Arden	Colville	4	0	1	15	1	1	\$6,710.73	\$6,710.73	20	20.33	\$406.52	\$15,818.16	\$22,935.41		\$22,935.41
A			Ponderay Newsprint Company	Usk	4	13	27	142	1	1	\$6,710.73	\$6,710.73	186	20.33	\$3,786.72	\$15,818.16	\$26,315.61		\$26,315.61
A	65	8	Boise Cascade Plywood	Kettle Falls	27	3	35	36	1	1	\$6,710.73	\$6,710.73	101	20.33	\$2,052.92	\$15,818.16	\$24,581.81		\$24,581.81
A	65	10	Boise Cascade Lumber	Kettle Falls	8	0	18	37	1	1	\$6,710.73	\$6,710.73	63	20.33	\$1,280.53	\$15,818.16	\$23,809.42		\$23,809.42
A	65	12	Vaagen Brothers Lumber Inc	Colville	20	4	49	47	1	1	\$6,710.73	\$6,710.73	120	20.33	\$2,439.11	\$15,818.16	\$24,968.00		\$24,968.00
A	65	33	Avista Utilities Kettle Falls	Spokane	20	3	369	12	1	1	\$6,710.73	\$6,710.73	404	20.33	\$8,211.68	\$15,818.16	\$30,740.57		\$30,740.57
A	71	25	Pacific Gas Transmission Co Station 8 (Walla Walla)	Portland	0	2	72	6	1	1	\$6,710.73	\$6,710.73	80	20.33	\$1,626.08	\$15,818.16	\$24,154.96		\$24,154.96
A	71	26	Pacific Gas Transmission Co Station 7 (Starbuck)	Portland	0	0	13	1	1	1	\$6,710.73	\$6,710.73	14	20.33	\$284.56	\$15,818.16	\$22,813.45		\$22,813.45
A	75	8	Washington State University	Pullman	3	0	8	0	1	1	\$6,710.73	\$6,710.73	11	20.33	\$223.59	\$15,818.16	\$22,752.47		\$22,752.47
A	75	201	Guy Bennett Lumber	Clarkston	0	0	0	0	1	1	\$6,710.73	\$6,710.73	0	20.33	\$0.00	\$15,818.16	\$22,528.89		\$22,528.89
A			Kinross	Ferry	0	0	0	0	1	1	\$6,710.73	\$6,710.73	0	20.33	\$0.00	\$15,818.16	\$22,528.89		\$22,528.89
A	25		REC	Grant	44	1	51	7	1	1	\$6,710.73	\$6,710.73	103	20.33	\$2,093.57	\$15,818.16	\$24,622.46		\$24,622.46
B	39	66	Goldendale Generating Station	Goldendale	3	1	21	3	1	1	\$6,710.73	\$6,710.73	28	20.33	\$569.13	\$15,818.16	\$23,098.01		\$23,098.01
B	17	37	Greater Wenatchee Regional Landfill	Wenatchee	6	4	9	5	1	1	\$6,710.73	\$6,710.73	24	20.33	\$487.82	\$15,818.16	\$23,016.71		\$23,016.71
B	39	2	SDS Lumber Co Bingen	Bingen	32	6	47	58	1	1	\$6,710.73	\$6,710.73	143	20.33	\$2,906.61	\$15,818.16	\$25,435.50		\$25,435.50
B	39	24	Regional Disposal Co.	Roosevelt	64	13	9	130	1	1	\$6,710.73	\$6,710.73	216	20.33	\$4,390.40	\$15,818.16	\$26,919.29		\$26,919.29
B	39	65	Roosevelt Landfill Biogas Project No. 1	Goldendale	7	0	77	4	1	1	\$6,710.73	\$6,710.73	88	20.33	\$1,788.68	\$15,818.16	\$24,317.57		\$24,317.57
M	5	9	US Energy Department	Richland	0	0	10	9	3	9	\$6,710.73	\$60,396.59	19	20.33	\$386.19	\$15,818.16	\$76,600.94		\$76,600.94
S	7	1	ALCOA Inc. Wenatchee Works	Malaga	546	2,906	63	266	2	4	\$6,710.73	\$26,842.93	3,781	20.33	\$76,852.38	\$15,818.16	\$119,513.47		\$119,513.47
S	11	5	Georgia-Pacific Consumer Products (Camas), LLC	Camas	145	19	508	128	2	4	\$6,710.73	\$26,842.93	800	20.33	\$16,260.75	\$15,818.16	\$58,921.84		\$58,921.84
S	15	2	Longview Fibre Paper and Packaging, Inc	Longview	81	202	1,372	219	2	4	\$6,710.73	\$26,842.93	1,874	20.33	\$38,090.81	\$15,818.16	\$80,751.90		\$80,751.90
S	15	3	Weyerhaeuser Longview	Longview	76	582	2,137	422	2	4	\$6,710.73	\$26,842.93	3,217	20.33	\$65,388.55	\$15,818.16	\$108,049.64		\$108,049.64
S	27	1	Cosmo Specialty Fibers	Cosmopolis	272	214	12	18	2	4	\$6,710.73	\$26,842.93	516	20.33	\$10,488.19	\$15,818.16	\$53,149.27		\$53,149.27
S	31	1	Port Townsend Paper	Port Townsend	310	150	473	44	2	4	\$6,710.73	\$26,842.93	977	20.33	\$19,858.44	\$15,818.16	\$62,519.53		\$62,519.53
S	53	8	Simpson Tacoma Kraft Co.	Tacoma	97	349	945	77	2	4	\$6,710.73	\$26,842.93	1,468	20.33	\$29,838.48	\$15,818.16	\$72,499.57		\$72,499.57
S	61	2	Kimberly Clark Corp.	Everett	0	0	0	0	2	4	\$6,710.73	\$26,842.93	0	20.33	\$0.00	\$15,818.16	\$42,661.09		\$42,661.09
S	71	3	Boise Cascade Paper	Wallula	103	793	860	142	2	4	\$6,710.73	\$26,842.93	1,898	20.33	\$38,578.64	\$15,818.16	\$81,239.72		\$81,239.72
S	73	1	INTALCO Aluminum	Ferndale	679	4,538	152	270	2	4	\$6,710.73	\$26,842.93	5,639	20.33	\$114,617.98	\$15,818.16	\$157,279.06		\$157,279.06
			Total		2,551	9,803	7,338	2,098		66		442,908.35	21,790		442,908.35	442,908.35	1,328,725.04	\$0.00	1,328,725.04

\$1,328,725.04

Development & Oversight

FY14

Total of D&O \$242,186.66

D&O for each Source \$1,906.98

Authority	# of Sources	D&O Share	1 year Rebate	Calculated D&O
Benton	2	\$3,813.96	\$272.79	\$3,541.18
CRO	5	\$9,534.91		
ERO	12	\$22,883.78		
Industrial	10	\$19,069.82		
Nuc Waste	1	\$1,906.98		
Northwest	22	\$41,953.59	\$2,883.61	\$39,069.98
Olympic	15	\$28,604.72	\$2,045.95	\$26,558.78
Puget Sound	34	\$64,837.37	\$4,529.98	\$60,307.39
Southwest	13	\$24,790.76	\$1,481.12	\$23,309.64
Spokane	9	\$17,162.83	\$1,208.18	\$15,954.66
Yakima	4	\$7,627.93	\$522.23	\$7,105.70
	127	\$242,186.66	\$12,943.85	\$175,847.33

Locals Share \$188,791.18 78.0%

Ecology Share \$53,395.48 22.0%

Total \$242,186.66

Locals D&O After Rebates \$175,847.33

Development & Oversight

FY15

Total of D&O \$180,571.07

D&O for each Source \$1,421.82

Authority	# of Sources	D&O Share
Benton	2	\$2,843.64
CRO	5	\$7,109.10
ERO	12	\$17,061.83
Industrial	10	\$14,218.19
Nuc Waste	1	\$1,421.82
Northwest	22	\$31,280.03
Olympic	15	\$21,327.29
Puget Sound	34	\$48,341.86
Southwest	13	\$18,483.65
Spokane	9	\$12,796.37
Yakima	4	\$5,687.28
	127	\$180,571.07

Locals Share \$140,760.12 78.0%

Ecology Share \$39,810.94 22.0%

Total \$180,571.07

Rebate Calculation 14

Source	Paid in 2013*	2014 Rebate
Benton Clean Air Authority	\$1,812.25	\$272.79
Northwest Clean Air Agency	\$19,157.13	\$2,883.61
Olympic Region Clean Air Agency	\$13,592.12	\$2,045.95
Puget Sound Clean Air Agency	\$30,094.66	\$4,529.98
Southwest Clean Air Agency	\$9,839.73	\$1,481.12
Spokane Regional Clean Air Agency	\$8,026.45	\$1,208.18
Yakima Regional Clean Air Authority	\$3,469.39	\$522.23
Stimson Lumber Co Arden	\$20,159.89	\$3,034.55
Ponderay Newsprint	\$23,999.40	\$3,612.49
Boise Cascade Corp Plywood	\$22,199.77	\$3,341.61
Boise Cascade Corp Lumber	\$20,837.71	\$3,136.58
Vaagen Brothers Lumber Inc	\$21,147.44	\$3,183.21
Avista	\$24,320.05	\$3,660.76
Pacific Gas Transmission Co Station 8	\$22,080.35	\$3,323.63
Pacific Gas Transmission Co Station 7	\$20,837.88	\$3,136.61
Washington State University	\$20,077.53	\$3,022.16
Guy Bennett Lumber	\$20,214.62	\$3,042.79
Kinross	\$0.00	
REC	\$0.00	
Calpine Goldendale Energy Center	\$20,773.98	\$3,126.99
Greater Wenatchee Reg Landfill & Recycling Center	\$20,331.40	\$3,060.37
SDS Lumber Company	\$22,380.49	\$3,368.81
Roosevelt Regional Landfill	\$24,371.51	\$3,668.51
Roosevelt Landfill Biogas Project No. 1	\$20,968.16	\$3,156.22
U. S. Department of Energy	\$66,358.71	\$9,988.60
ALCOA Wenatchee	\$83,837.00	\$12,619.51
Georgia-Pacific Consumer Products (Camas), LLC	\$52,846.28	\$7,954.65
Longview Fibre	\$77,791.96	\$11,709.59
Weyerhaeuser Co. Longview	\$90,591.69	\$13,636.26
Cosmo Specialty Fibers	\$37,114.60	\$5,586.65
Port Townsend Paper	\$52,092.91	\$7,841.25
Simpson Tacoma Kraft	\$58,673.28	\$8,831.76
Kimberly-Clark Corp.	\$61,506.73	\$9,258.26
Boise Cascade	\$67,783.60	\$10,203.08
INTALCO Aluminum	\$127,015.60	\$19,118.94
Total fees Paid to Ecology	\$1,186,304.27	\$178,567.70
One Year's Rebate	\$178,567.70	
Rebate Factor		0.150524368

*Amount actually paid (per BARTS), not just billed

Locals rebate \$ 12,943.85
 Ecy aop rebate \$165,623.85

Rebate Calculation 15

Source	Paid in 2014	2015 Rebate
Benton Clean Air Authority	\$4,246.27	\$156.19
Northwest Clean Air Agency	\$25,429.21	\$935.37
Olympic Region Clean Air Agency	\$19,756.57	\$726.71
Puget Sound Clean Air Agency	\$50,659.20	\$1,863.42
Southwest Clean Air Agency	\$21,198.51	\$779.75
Spokane Regional Clean Air Agency	\$15,511.54	\$570.57
Yakima Regional Clean Air Authority	\$7,283.64	\$267.92
Stimson Lumber Co Arden	\$26,541.90	\$976.30
Ponderay Newsprint	\$0.00	\$0.00
Boise Cascade Corp Plywood	\$27,829.32	\$1,023.66
Boise Cascade Corp Lumber	\$25,934.85	\$953.97
Vaagen Brothers Lumber Inc	\$26,775.63	\$984.90
Avista	\$32,966.32	\$1,212.61
Pacific Gas Transmission Co Station 8	\$26,296.22	\$967.26
Pacific Gas Transmission Co Station 7	\$24,519.60	\$901.91
Washington State University	\$26,093.01	\$959.79
Guy Bennett Lumber	\$25,964.98	\$955.08
Kinross		
REC		
Calpine Goldendale Energy Center	\$25,053.53	\$921.55
Greater Wenatchee Reg Landfill & Recycling Center	\$24,374.50	\$896.58
SDS Lumber Company	\$26,857.31	\$987.90
Roosevelt Regional Landfill	\$28,029.56	\$1,031.02
Roosevelt Landfill Biogas Project No. 1	\$25,830.49	\$950.13
U. S. Department of Energy	\$43,256.97	\$1,591.14
ALCOA Wenatchee	\$69,372.83	\$2,551.77
Georgia-Pacific Consumer Products (Camas), LLC	\$68,998.33	\$2,537.99
Longview Fibre	\$102,605.74	\$3,774.19
Weyerhaeuser Co. Longview	\$122,707.01	\$4,513.58
Cosmo Specialty Fibers	\$52,425.98	\$1,928.40
Port Townsend Paper	\$29,294.98	\$1,077.57
Goldendale Aluminum	\$24,268.84	\$892.69
Simpson Tacoma Kraft	\$64,826.17	\$2,384.53
Kimberly-Clark Corp.	\$61,901.82	\$2,276.96
Boise Cascade	\$84,214.60	\$3,097.70
INTALCO Aluminum	\$63,690.68	\$2,342.76
Total fees Paid to Ecology	\$1,304,716.11	\$47,991.87
One Year's Rebate	\$47,991.87	
Rebate Factor		0.036783381