



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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Ref: 8ARD-PM

Mr. Fred Collins, Interim Bureau Chief  
Air Quality Bureau  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, Montana 59620-0901

Re: Fourth-Round Title V Program Review – Final Report

Dear Mr. Collins:

Enclosed is the U.S. Environmental Protection Agency Region 8's fourth-round program review final report for Montana's Clean Air Act Title V Operating Permit Program. No comments were submitted by your office on the draft report. The objective of the fourth-round Title V program review was to follow up on issues raised during the third-round program review, identify best practices that other agencies can learn from, document any areas needing improvement, and learn how the EPA can help improve state and local Title V Programs and expedite permitting. We greatly appreciate the cooperation of your office in the preparation of this report.

If you have any questions concerning the enclosed report, your staff may contact Carson Coate, of my staff, at (406) 457-5042 or at [coate.carson@epa.gov](mailto:coate.carson@epa.gov).

Sincerely,

4/13/2021

X Carl Daly

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Signed by: CARL DALY  
Carl Daly  
Acting Director  
Air and Radiation Division

Enclosures

cc: Julie Merkel, Permitting Section Supervisor, AQB, MDEQ



**Montana Department of Environmental Quality  
Title V Program Review**

**FINAL REPORT**

**April 2021**

Conducted by

**United States Environmental Protection Agency  
Region 8**

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## **Executive Summary**

In April 2020, the U.S. Environmental Protection Agency (EPA) verbally notified the Montana Department of Environmental Quality (MDEQ) that they were selected for a Title V Operating Permit Program Review. In addition to this notification, the EPA sent written correspondence to MDEQ on June 4, 2020, commencing the fourth-round Title V Program Review. Included in this correspondence was the fourth-round Title V Questionnaire and Fiscal Tracking Evaluation Form to be completed by MDEQ.

The purpose of the program review was to evaluate MDEQ's implementation of the operating permit program, note practices that would benefit other agencies, document areas needing improvement and learn how the EPA could assist in the future, if needed. The EPA conducted these program reviews as part of its obligation to oversee and review state programs it approved for implementing the Title V Program.

The EPA conducted similar reviews in 2003, 2008 and 2014. This review was conducted slightly different than previous reviews in that the review was completed remotely due to the Coronavirus Pandemic. MDEQ's responses to the Title V Questionnaire and Fiscal Tracking Evaluation Form were the basis of EPA's review along with the EPA's ongoing review of operating permits issued by MDEQ.

### Conclusions

The EPA's third-round review did not identify any deficiencies, and therefore, there are no findings or recommendations to follow up on in this review. The MDEQ continues to provide the EPA with all the permits issued by their Title V Program. Further, MDEQ's Title V Program provided all the necessary information for the EPA to conduct a thorough review. The EPA did not find any areas of concern during the fourth-round review of MDEQ's Title V Program and believes MDEQ runs an effective Title V Program.

## **Introduction**

The EPA conducted this program review as part of its obligation to oversee and review state title V operating permit programs that have been approved by the EPA, and in response to recommendations from an audit conducted in July 2002 by the EPA's Office of Inspector General.

The State of Montana operates a fully EPA approved program that allows it to implement the requirements of Title V of the Clean Air Act (CAA), including the issuance of operating permits. The EPA has a statutory responsibility to oversee the programs it has approved by performing oversight duties, including occasional program reviews. Such responsibilities include overseeing the activities of a state program to ensure that local, regional, and national environmental goals and objectives meet minimum requirements outlined by the federal regulations.

## **Objective of the Program Review**

Following the completion of the first, second and third round of state program reviews, the EPA nationally committed to continuing scheduled Title V Program Reviews. The objectives of the fourth-round review are to: (1) conduct a follow-up to the third-round reviews by ensuring that any EPA or state concerns identified during the third-round reviews have been addressed or are being addressed satisfactorily; (2) identify and document good practices that can benefit other permitting authorities; (3) document any areas of concern that need improvement; and (4) learn how the EPA may assist state and local permitting authorities.

## **Program Review History**

The first-round review was conducted in response to recommendations from a 2002 audit performed by the Office of Inspector General. The EPA conducted its first-round review of MDEQ's Title V Program in 2003. The EPA sent a nationally standardized Title V Program Evaluation Questionnaire and Fee Questionnaire to the MDEQ to be completed and returned to the EPA. After reviewing MDEQ's responses to the questionnaires, the EPA scheduled an on-site visit to conduct interviews and file reviews. A final report was issued in May 2004 that outlined the EPA's findings for MDEQ's Title V Program.

The second-round review was done in 2008 and focused primarily on: (1) assessing and documenting MDEQ's progress in areas where the EPA had previously identified as areas needing improvements; (2) assessing permitting authorities' evaluation of EPA's effort in providing additional assistance to improve its Title V operating programs; (3) identifying continued improvements in the program's previously identified strong attributes; (4) identifying new good practices by the state since the first round review; and (5) conducting a Title V Operating Permit Program Fee Audit.

The third-round review was completed in 2014 and the EPA found that the MDEQ had addressed those issues identified as needing improvement during the first two reviews. The EPA did not identify any deficiencies in its third-round review of MDEQ's Title V Program.

## **Program Review Process**

In April 2020, the EPA verbally notified the MDEQ that they were selected for a Title V Program Review. In addition to this notification, the EPA sent written correspondence to the MDEQ on June 4, 2020 commencing the fourth-round Title V Program Review. Included in this correspondence was the fourth-round Title V Questionnaire and Fiscal Tracking Evaluation Form to be completed by the MDEQ. By providing these documents at the beginning of the review, the MDEQ had an opportunity to see what information would be sought during the review and to ask any clarifying questions. In a normal year, the EPA requests that these documents be returned in 60 days which allows the EPA time to review the permitting authority's responses and schedule on-site meetings and file reviews. No on-site meetings or file reviews were scheduled during this year's review due to the Coronavirus Pandemic.

The fourth-round Title V Program Review primarily focused on MDEQ's responses to the Title V Questionnaire and the Fiscal Tracking Evaluation Form (Attachments 1 and 2, respectively) along with EPA's ongoing review of the operating permits issued by the MDEQ. The Title V Questionnaire focuses on those things inherent to permit issuance such as: Title V procedures that may have changed since the last review; permits issued within regulatory timeframes; public participation; Title V petitions; and MDEQ's relationship with the EPA. The Fiscal Tracking Evaluation Form is used to audit Title V Fees by determining if the following are satisfied:

- Sources are being billed in accordance with fee requirements and are paying the required fees;
- Division of expenses is identified by the MDEQ between Title V and non-Title V programs;
- Features are integrated into MDEQ's accounting/financial management system which will identify Title V revenue and expenditures separate from other funding, and produce management reports that certify the disposition of Title V funds; and
- Title V fees collected from sources are used by the MDEQ to pay for the entire Title V Program and no such fees are used as match to MDEQ's CAA Section 105 Air Program grant.

Ultimately, the EPA has two main reasons for conducting these periodic reviews. First, the EPA seeks to effectively perform its regulatory oversight obligation under the Clean Air Act. Second, the EPA hopes such reviews will improve communications and relationships between the EPA and the permitting authority.

## **Follow-up to Third-Round Review**

The EPA found no significant deficiencies during the third-round review of MDEQ's Title V Program. The MDEQ provided all the necessary information to conduct the review and the EPA determined that the MDEQ was meeting the requirements of the 40 CFR part 70 (Part 70) regulations. Therefore, there are no follow-up items to discuss.

## **Fourth-Round Review's Findings and Comments**

### ***What does the state think it's doing especially well in the Title V Program?***

The MDEQ believes they effectively communicate with industry representatives, stakeholders, and outside interest groups. By communicating with industry throughout the permitting process, industry tends to submit improved applications which in turn, allows the them to establish clear permit conditions and compliance demonstrations that accurately assess a facility's compliance.

The MDEQ also believes their communication with stakeholders and outside interest groups is vital to implementing their Title V Program. It allows the them to address controversial topics up front and alleviate challenges and appeals.

### ***Are there any issues affecting the Title V Program in your state right now that you consider particularly important?***

The MDEQ stated in the questionnaire that:

“The Department has seen a significant decline in air pollution across the state with a loss of revenue as a result. To address this, the Department is first looking at increasing efficiency and effectiveness while keeping costs as low as possible.”

The MDEQ also mentioned that there are no EPA policies or regulatory issues that are causing concern at this time and stated that the EPA's continued communication and engagement with the MDEQ is much appreciated.

### ***Percent of Title V Permits issued within regulatory timeframe specified in 40 CFR 70.7(a)(2) and 40 CFR 70.7(e)(4)(ii)***

The MDEQ has issued 100% of their initial permits and significant modifications within regulatory timeframes. Since EPA's third-round review, the MDEQ issued three initial permits and 20 significant modifications.

### ***What Percent of Title V Permits expire before they can be renewed?***

The MDEQ said that approximately 92% of Title V permit renewals were issued after the expiration of the previous permit. Since April 2016, the MDEQ issued 60 Title V renewal permits and 55 of them were issued after the previous permit expired. The MDEQ explained that according to their regulatory timeframes, a source must submit a renewal application no later than six months prior to the expiration of their current permit. In Montana, Title V timeframes require 3.5 months from the time an application is deemed complete until the final permit is issued. This only leaves 2.5 months for application review, file review, Compliance Assurance Monitoring (CAM) plan review/approval and the addition of permit modifications, as necessary. Therefore, the entire 18-month Title V issuance timeframe is utilized to issue permits appropriately.

### ***Compliance Assurance Monitoring***

The MDEQ stated that CAM plan requirements are not slowing down the renewal process and if a plan is inadequate, it is usually due to a lack of data demonstrating that an indicator is a good measure of compliance. The MDEQ did mention that facilities have been very cooperative in providing any additional information requested by the Department.

The MDEQ believes CAM training is adequate; however, less experienced staff, who have not had CAM training, can find the determinations difficult and time consuming. As staff get more experience and training, they will better know the level of detail required to complete a CAM plan review.

***What improvements has the State made to the management of the Title V Program since the third-round review and what improvements, if any, does the State plan to make in the next five years?***

The MDEQ re-aligned its structure in 2019 and moved the Field Services Section from Helena, Montana to Billings, Montana. By moving staff closer to the facilities that they oversee, they have reduced travel distances and expenses. They also believe staff's knowledge of facilities and the amount of compliance assistance offered will increase. This should result in an increased compliance rate for facilities.

The MDEQ hopes to streamline their Title V Program's reporting process in the next five years. In doing so, they should realize efficiencies during the submittal process and staff review.

***What forms of news media do you use to maximize public participation, for implementation of 40 CFR 70.7(h)?***

The MDEQ continues to use newspapers of general circulation in the area of the facility and relies heavily on their website to get information to the public. In addition, the MDEQ has a robust stakeholder process that includes public participation (i.e. the Clean Air Act Advisory Committee). Further, the MDEQ has interested party lists for general air quality activities such as rulemaking along with application-specific party lists which are maintained by the permit writer for the that specific action of concern.

***Petitions***

The EPA has not received any Title V petitions on operating permits issued by MDEQ since the third-round review.

***EPA Relationship***

The MDEQ stated that there are no EPA Title V policies causing significant problems or confusion. However, they mentioned that addressing startup, shutdown and malfunction (SSM) emissions in Title V has increased permit processing time and confusion, in some cases.

***Training***

The MDEQ conducts internal training which often involves using current permitting examples. However, they are continually seeking additional training opportunities for their staff and believe the EPA could assist by sponsoring or providing such training.

**Fee Audit**

The EPA did not conduct a formal Title V Program Fee Audit during the first or third round of Title V Program Reviews. A fee audit was conducted during the second-round review and again during this fourth-round review.



To initiate the fourth-round Fee Audit a Fiscal Tracking Evaluation Form was sent to the MDEQ. The Fiscal Tracking Evaluation Form is used by the EPA to audit Title V Fees by determining if the following are satisfied:

- Sources are being billed in accordance with fee requirements and are paying the required fees;
- Division of expenses is identified by the MDEQ between Title V and non-Title V programs;
- Features are integrated into MDEQ’s accounting/financial management system which will identify Title V revenue and expenditures separate from other funding, and produce management reports that certify the disposition of Title V funds; and
- Title V fees collected from sources are used by the MDEQ to pay for the entire Title V Program and no such fees are used as match to MDEQ’s CAA Section 105 Air Program Grant.

In addition to the Fiscal Tracking Evaluation Form, the MDEQ provided the following information from the Air Quality Bureau (Attachments 3-6):

- Task profiles for all the employees of the bureau showing the percentage of time spent within each organizational unit (Title V, Minor Source, Smoke Management, etc.);
- An accounting report that shows the revenues and expenditures for every organizational unit;
- A check coding document that shows how organizational units are tied to accounting codes; and
- A Performance Partnership Grant (PPG) match document for FY15-FY20 that shows the amount of non-Title V money collected by the bureau and demonstrates that Title V money was not used as match to the MDEQ’s CAA Section 105 Air Program Grant.

The MDEQ has increased their fees over the years due to a reduction in Title V major sources and a reduction in emissions across Montana. Sources are billed a fee per permit action and an annual operating fee. The annual operating fee is based on a flat administrative fee and the emissions emitted by the source in that calendar year. The MDEQ calculates the emissions for every source through an annual emission inventory process. According to the MDEQ, Title V sources generally pay within 60 days and they have few collection issues with the Title V sources. MDEQ’s fee collection authority for Title V is contained in the Administrative Rules of Montana Title 17, Chapter 8, Subchapters 5 and 12. The current fees are:

Title V Application Fees	
New	\$6,500
Renewal	\$2,000
Modification	\$1,500
Annual Operating Fees	
Base Administration Fee	\$900
Pollutant Fee (PM <sub>10</sub> , SO <sub>2</sub> , NO <sub>x</sub> , Pb, VOC)	\$44.35/ton

## **Title V Permit Review**

The MDEQ provides the EPA with all Title V permits issued which allows the EPA to review MDEQ's implementation of their Title V Program on a continual basis. MDEQ's Title V Program incorporates all the provisions required by Part 70. Permits are clear and concise, and they incorporate appropriate conditions, demonstrations, recordkeeping, and reporting requirements to assess a source's compliance. The MDEQ properly notifies the public of permitting actions and sends all proposed permits to the EPA for review. The MDEQ has been quick to respond to any questions or concerns raised by the EPA and has been willing to work collaboratively with the EPA.

## **MDEQ Organization and Staffing**

The organizational structure of the MDEQ consists of a Director and Deputy Director that oversee five Divisions. Each Division is headed by a Division Director and divided into separate bureaus. The Air Quality Bureau is in the Air, Energy, and Mining Division and contains the Permitting Services Section (an organizational chart is provided in Attachment 7). The Permitting Services Section is responsible for issuing Montana Air Quality Permits and Montana Title V Operating Permits and works closely with the Field Services Section and the Analysis and Planning Services Section. The Permitting Services Section consists of one supervisor, one lead engineer, and eight staff positions; however, one staff position is currently vacant. The staff shifts their priorities between major source (Title V, prevention of significant deterioration (PSD) and new source review (NSR)) and minor new review source (MNSR) permit actions, as required.

## **Conclusion**

In conclusion, the MDEQ implements an effective Title V Program. During this round of review, the EPA determined that MDEQ's Title V permits continue to meet the Part 70 requirements and the MDEQ is administering their Title V fees in accordance with Part 70. No deficiencies were noted by the EPA during this review.

**ATTACHMENT 1**

**TITLE V FOURTH-ROUND STATE PROGRAM REVIEW QUESTIONNAIRE AND  
RESPONSES BY MDEQ**

# Title V Fourth Round State Program Review Questionnaire

## I. General Program Review Questions and Responses

- A. What has been done in response to EPA recommendations for improvements from the third round program review?

**The EPA did not have any listed concerns in the Third Round. However, to assist the Department, EPA provided the *Region 7 Policy on Periodic Monitoring for Opacity*. The Region 7 policy allows for visual observations that are qualitative as opposed to quantitative.**

- B. What key EPA comments on individual Title V permits remain unresolved (EPA to determine this)? What is the State's position on these unresolved comments?

**The Department is unaware of any unresolved EPA comments. If there are unresolved EPA comments brought to the Department's attention, the Department will work diligently with EPA to find a satisfactory solution.**

- C. Have any procedures in Title V changed (e.g., public participation, petitions, communication with EPA) since the third-round program review?

**No. The Department continues to work closely with EPA to communicate Title V permit actions/renewals that generate a high level of interest from outside groups, so that EPA is aware of public interest levels. The Department appreciates EPA's input in this regard**

- D. What does the state think it's doing especially well in the Title V program?

**The Department believes it is doing well communicating with industry representatives prior to applications being submitted, during the writing of the permit, and during the implementation of the permit requirements. This allows for clear conditions to be established along with compliance demonstrations that accurately assess the compliance status of the facility.**

**The Department also believes communication with stakeholders and outside interest groups is vital to implementing the Title V program efficiently. The Department believes that addressing controversial topics up front alleviates challenges and appeals.**

- E. Are there any issues affecting the Title V program in your state right now that you consider particularly important?

**The Department has seen a significant decline in air pollution across the state with a loss of revenue as a result. To address this, the Department is first looking at increasing efficiency and effectiveness while keeping costs as low as possible.**

1. Which one would you rate as the most important?

**Addressing increased efficiency and effectiveness while keeping costs as low as possible.**

2. Are there any EPA policies or regulatory issues that are causing concern?

**There are no EPA policies or regulatory issues that are causing concern at this time.**

3. How can EPA help?

**Continued communication and engagement of EPA with the Department is much appreciated.**

## II. Permit Issuance

- A. Since the third round program review, what percent of Title V initial permits have you issued within the regulatory timeframe specified in 40 CFR 70.7(a)(2)?

**The Department has issued 100 % of Title V initial permits within the regulatory timeframe. Three initial permits have been issued since April 2014.**

- B. Since the third-round program review, what percent of Title V significant permit modifications have you issued within the regulatory timeframe specified in 40 CFR 70.7(a)(2) and (e)(4)(ii)?

**The Department has issued 100% of Title V significant permit modifications within the regulatory timeframe. Twenty Title V significant modifications have been issued since April 2014.**

- C. What percent of Title V permits expire before they can be renewed?

**Approximately 92% of Title V permit renewals were issued after the expiration of the previous permit. Since April 2014, 60 Title V renewal applications have been issued, with 55 of those being issued**

1. For those permits that could not be renewed before they expired, what are the reasons they could not be renewed prior to their expiration?

**According to our regulatory timeframes, a source must submit a renewal application no later than six months prior to expiration. Title V timeframes in Montana alone require 3.5 months, leaving only 2.5 months for application review, file review, CAM review, and approval, and permit modifications, as necessary. The entire 18-month issuance timeframe is utilized to issue the permits appropriately.**

D. Have unresolved violations created any delay in issuing Title V renewals?

**Not significantly.**

E. Have permittees requested a hold in renewal for any reason?

**None have thus far.**

F. CAM

1. Are CAM plan requirements slowing the renewal process?

**No**

a. If so, what is it about CAM that's problematic?

2. Where CAM plans have been inadequate, what have been the main types of inadequacies that have caused difficulties or delays in permit issuance?

**The submittal of inadequate or insufficient indicators and lack of data correlation to demonstrate how they can be good indicators of compliance.**

3. What difficulties have you had in getting better plans to be submitted?

**Facilities have been very cooperative in providing any information requested by the Department.**

4. Have you had to supplement the CAM technical guidance document (TGD) with state-issued guidance?

**No**

5. Is CAM training adequate?

**Yes. However, the Department has several permittees who have not attended the training.**

6. Are CAM applicability determinations resource-intensive or difficult?

**Generally, they are not, however, determinations on older units that have less emission information available (particularly for uncontrolled emissions) may require more resources and research to make a Department determination. In addition, less experienced staff who have not had CAM training, may find the determinations more difficult. Specifically, staff need more training and experience to know what level of detail is required by the**

**Department to check statistical analysis and/or data correlations that are used to support information within the CAM plan.**

- G. What improvements does the State believe it has made to the management of the Title V permit program, since the third-round program review, that could be described as best practices and could be of interest to other States?

**The Department re-aligned its structure in 2019 and moved the Field Services Section from Helena to Billings. Having staff closer to the facilities they oversee will reduce the travel distance of staff and will increase the education and compliance assistance staff are able to offer which should result in an increased compliance rate of regulated facilities.**

- H. What improvements does the state plan to make, if any, in the management of the Title V permit program within the next five years?

**The Department hopes to streamline the reporting process for the Title V program, gaining efficiencies in what is submitted as well as staff review.**

1. Does the state have a set period of time for planning cycles?

**The Department plans to work on this during the next few years.**

III. Public Participation

- A. What forms of news media do you use to maximize public participation, for implementation of 40 CFR 70.7(h)?

**The Department continues to use newspapers of general circulation in the area of the facility, and relies heavily on the Department's website.**

1. How is the form of media chosen?

**Using whatever is available**

2. How do you believe public participation should be improved?

**The Department has a very robust stakeholder process which includes public participation.**

- B. Do you have a mailing list for Title V public participation for implementation of 40 CFR 70.7(h)(1)? If so, please provide it.

**The Department has an interested parties list for general air quality activities such as notification for rulemaking, as well as application-specific interested parties lists which are maintained by the permitter for that specific action. The Department does not have a list specifically for Title V public participation at this time, but would create one if it was requested and deemed to provide significant benefit.**

- C. Is there a policy which outlines the response to comments procedure or process, such as which comments are responded to, the timeframe for responding, how the permitting authority will respond, to whom, etc.?

**The Department does not have a policy on responding to comments. However, the Department responds to every comment received within a timely manner.**

1. If written, can you provide a copy? If not written, could you describe the policy?

#### IV. Petitions

- A. Since the third round program review, to what extent have Title V petitions:

1. Changed how permits are written;

**No petitions have been filed since the third round program review.**

2. Resulted in re-openings of other permits;

**No permits were re-opened because of petitions.**

3. Resulted in an amended permitting process, to address any issues settled through petitions granted in full or in part?

**No permits were re-opened because of petitions.**

#### V. EPA Relationship

- A. Is there any EPA policy, on Title V, that is causing problems or confusion? (NOTE: Answer may or may not be the same as I.E.2.)

**Not significantly**

- B. Has the state developed any tools, strategies, or best practices that have assisted in the inclusion of MACT subparts in Title V permits?

**The Department continues to use a case-by-case approach to address the inclusion of MACT subparts in Title V permits.**

- C. Is the issue of startup-shutdown-malfunction (SSM) emissions causing problems or confusion in Title V permit writing?

**The Department addresses SSM emissions for permitted pollutants in Montana Air Quality Permits. However, addressing them in Title V has added to permit processing time and confusion, in some cases.**

1. Has the state developed any tools, strategies, or best practices that have alleviated problems or confusion if either exist?



**While the Department has not developed any specific tools to address SSM emissions, staff continue to work on gaining a clear understanding of how SSM emissions are addressed in Title V as well as MAQP's.**

D. Do you have any unaddressed training needs? What can EPA do to help?

**The Department is continually looking for training opportunities for staff. Internal training is ongoing, using current permitting examples, however, EPA could assist by sponsoring or providing such training.**

**ATTACHMENT 2**

**TITLE V PROGRAM FISCAL TRACKING EVALUATION FORM AND RESPONSES  
BY MDEQ**

## State/local Title V Program Fiscal Tracking Evaluation Document

Basic Questions for All Permitting Authorities	More Detailed Questions -- Factors to Support a Permitting Authority's Answer to the Basic Questions (Note: these are not all-inclusive, and some ideas will not apply in all cases)	Possible Resources Available
<b>1. Title V Fee Revenue</b>		
<p>Can the Permitting Authority show that sources are being billed in accordance with its fee requirement(s), and that sources are paying fees as required?</p>	<p>Where are the fee collection authority and the fee rate(s) specified? Is the Permitting Authority including reference to these fee requirements in its Title V permits?  <b>Administrative Rules of Montana Title 17 Chapter 8 Subchapter 1210(2)(f) and ARM 17.8 Subchapter 5 in rules and the operating permit general conditions of every permit.</b></p> <p>List the fee rate(s) formulae applicable for the time period being reviewed. (Include emission based fees, application fees, hourly processing fees, etc.)</p> <p><b>Application fees: (effective 10/10/2014)</b>  <b>New Title V operating permit: \$6500 (ARM 17.8.504(2)(a))</b>  <b>Title V operating permit renewal: \$2000 (ARM 17.8.504(2)(b))</b>  <b>Title V operating permit modification: \$1500 (ARM 17.8.504(2)(c))</b>  <b>Annual operating fee: (effective up to 10/20/2018)</b>  <b>\$800 base administrative fee plus \$38.24/ton of PM<sub>10</sub>, SO<sub>2</sub>, Pb, NO<sub>x</sub>, and VOCs emitted per year.</b>  <b>Annual operating fee: (effective 10/20/2018)</b>  <b>\$900 base administrative fee plus \$44.35/ton of PM<sub>10</sub>, SO<sub>2</sub>, Pb, NO<sub>x</sub>, and VOCs emitted per year.</b></p> <p>Does the Permitting Authority anticipate any significant changes to its fee structure?  <b>The Department assesses the fee structure each year and determines any changes that would be appropriate at that time.</b></p>	<p>Req's/Auth.: State/local Title V program legislation &amp; regulations</p> <p>Permit ref's: Permits state has written/submitted to EPA</p> <p>Fee Rate(s): State/local Title V program submittal, and then verify w/ Permitting Authority that info is up-to-date</p> <p>Billing/Payments: Permitting Authority records. Emission data may be in AIRS. If some fees are hourly, there should be some direct labor tracking mechanism (see accounting system, below).</p>

	<p>What is the current status in States/locals with requirements to balance income &amp; expenditures of the Title V program annually (i.e., must rebate any overage of fees, etc.)? <b>There are no regulatory requirements to rebate fees collected in excess of statutory appropriation.</b></p>	
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**1. Title V Fee Revenue – Continued**

Examine documentation of how the annual fees for sources are determined. Audit several sources' bills for accuracy.

- Are appropriate (actual or potential) emission records used for \$/ton based fees? How are the Permitting Authority and its sources determining actual emissions for fee purposes?

**Actual emissions are used to assess fees and emissions are tracked by the required submittal of annual emissions inventories from each permitted source.**

- Are records kept (and used) for any hourly based fees?

NA

- Review similar documentation for other types of fee mechanisms.

NA

Billing...

- How is the Permitting Authority notifying sources of the fees owed and due dates for payment?

**Bills are mailed to sources annually**

- Discuss how incoming payments are recorded to the appropriate accounts (receiving's tracking).

**The invoices are mailed out with the annual bill and are to be returned with fee payment. When invoices are calculated the appropriate revenue codes and corresponding receivables are booked into the Accounts Receivable Module in the State of Montana's accounting system SABHRS (State Accounting Budgeting & Human Resource Software). When payment is received the receivable is reduced.**

**1. Title V Fee Revenue – Continued**

Payments...

- Are the sources paying the total fees charged each year? **Yes**
- Are they paying on time? **Yes, Title V sources generally pay within 60 days of being billed.**
- If there's a collection problem, how is the Permitting Authority addressing it? **Historically, there has not been a collection problem with Title V sources.**
- Are late fees being assessed? If so, are the late fees being credited to the Title V accounts? **Any late fee assessment for a Title V source would be credited to the Title V account.**

2. Title V Expenditures		
<p>Is the Permitting Authority identifying division of expenses between Title V and non-Title V programs? Yes</p>	<ul style="list-style-type: none"> <li>• What matrix is the Permitting Authority using to differentiate Title V activities from non-Title V activities?</li> </ul> <p><b>The Department differentiates Title V activities from non-Title V activities using separate organizational units in SABHRS.</b></p> <p>Direct labor:</p> <ul style="list-style-type: none"> <li>• If used by State/local program, review time sheets and instructions given to employees as to how to code information into the time sheet. If time sheets are not used, investigate method that State/local program uses to differentiate Title V and non-Title V direct labor.</li> </ul> <p><b>Task profiles are assigned to an individual to reflect the duties of their position. Task profiles differentiate between Title V and non-Title V direct labor costs.</b></p> <ul style="list-style-type: none"> <li>• Ensure that accounting system is set up to utilize the various coding information.</li> </ul> <p><b>Copy of accounting report provided.</b></p> <ul style="list-style-type: none"> <li>• Analyze time sheets/instructions (and/or other direct labor differentiation method) for conformance with the matrix of acceptable Title V activities.</li> </ul> <p><b>See task profiles</b></p>	<p>If used by State/local program, sample time sheets and instructions given to employees; equivalent records for alternate direct labor differentiation methods.</p> <p>Accounting system records showing that administrative/ clerical personnel costs are accounted for in the Title V program</p> <p>Accounting system records showing that non-labor costs (travel, equipment, office space costs, etc.) are accounted for in some fashion and a portion is billed to Title V.</p> <p>EPA Guidance includes: “Matrix of Title V-Related and Air Grant-Eligible Activities, Information Document,” Office of Air &amp; Radiation, May 31, 1994</p>

**2. Title V Expenditures – Continued**

Direct non-labor:

- Does the Permitting Authority utilize an allocation system that separates travel and equipment costs for Title V and non-Title V functions? **Yes**
- If so, are the allocations in accordance with the Permitting Authority's Title V/ non-Title V activity separation? **Yes**
- If not, are these included as part of indirect costs? (Direct non-labor needs to be addressed somewhere.)

Indirect labor & non-labor:

- How are indirect labor & non-labor costs apportioned between Title V vs. non-Title V accounts? (Indirect costs include parts of secretarial & managerial overhead, paper & supplies, space, utilities, generalized computers, etc., that is not addressed as direct labor/non-labor)

**Indirect labor costs are apportioned on a percentage of salary and benefits. The current labor indirect rate is 23.81% (EPA maximum cap of 24.00%). Indirect non-labor costs are apportioned on a percentage of the operating expenses. The current non-labor indirect rate is 4.00%. The Department differentiates the Title V expenses from the non-Title V expenses using differentiating organizational units in SABHRS.**



**3. Accounting System (i.e., the system that provides for analysis of the Title V program revenue and expenditure information gathered above)**

<p>Has the Permitting Authority integrated features into its accounting/financial management system which will:</p> <ul style="list-style-type: none"> <li>• identify Title V fee revenues separate from other funding? <b>Yes</b></li> <li>• identify Title V expenditures separate from other expenses? <b>Yes</b></li> <li>• produce management reports, periodically and as requested, which the Permitting Authority will be able use to certify as to the disposition of Title V funds? <b>Yes – produce reports from the accounting system as well as management spreadsheet reports.</b></li> </ul>	<p>Describe the accounting structure that the Permitting Authority uses to differentiate Title V \$ from other funds. [i.e., govt. fund, enterprise fund, etc. -- for more detail on options, see the U of MD report.] <b>The Title V funds are given their own revenue codes separating application fees and operating fees for Title V and non-Title V sources and expenditures are tracked on a Title V/non-Title V basis.</b></p> <p>Does the accounting system have separate categorization for Title V and non-Title V funding and expenses? <b>Yes</b></p> <p>If yes, are these features being used to track Title V monies separate from non-Title V monies? <b>Yes</b></p> <p>If no, does the Permitting Authority keep any separate records that identify Title V monies separate from non-Title V monies? Could such information potentially be integrated into an accounting/financial management system?</p>	<p>Review sample reports/specific reports for the time period being reviewed.</p> <p>For background: <u>Overview of CLEAN AIR Title V Financial Management and Reporting, A Handbook for Financial Officers and Program Managers</u>, Environmental Finance Center, Maryland Sea Grant College, University of Maryland, 0112 Skinner Hall, College Park, MD 20742, January 1997, [Publication Number UM-SG-CEPP-97-02]</p>
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**4. Separation of Title V from §105 grant and grant match funding**

Can the Permitting Authority confirm that the Title V fees collected from sources are used to pay for the entire Title V program, and that no Title V fees are used as match to the CAA section 105 Air Program grant?

**Yes**

Determine the federal §105 grant award received, and the amount of state/local funds used during the time period being reviewed.  
**The worksheet provided demonstrates that the Department collected enough non-Title V revenue to cover the required match without using Title V monies.**

Determine the Title V fees collected (and Title V funds available, if carryover of Title V fees is allowed by state/local regulations) during the time period being reviewed.

Determine Title V expenditures during the time period being reviewed.

Ensure that adequate non-Title V state/local funds were available to provide required match to the federal grant.

Ensure that sufficient Title V funds were available to pay for the Title V program (i.e.--Title V program is self-supporting)

Grant files -- FSR's for applicable years. (See appropriate EPA Region grant & project manager staff)

Permitting Authority accounting system reports showing revenue and expenditure summaries for Title V, grant, and other activities

**ATTACHMENT 3**  
**AQB TASK PROFILES**

Department ID	Task Profile	Position Numb	Title	Last Name	First Name	FTE	03981	01100	02201	02201	02201	02201	02201	03262	03325	03262	Total	
							514705	514712	514717	514741	514743	514752	514761	514772	514776	514777		Percentage
							BLM-Air Monitoring	General Fund	Reg Portables	Title V Fees	Reg Oil & Gas	Minor Source	Smoke Mgmt	Air-PPG	PM 2.5	Air-Multi-Purpose Grant		
53156ADMIN	5318003A	53100016	Division Administrator	Dorrington	Christopher	0.41	0.00%	0.00%	0.00%	34.94%	0.00%	5.69%	0.00%	0.00%	0.00%	0.00%	41.00%	
53156AEMFM	5318003A	53140070	Fiscal Manager	Kelly	Denise	0.41	0.00%	0.00%	0.00%	34.94%	0.00%	5.69%	0.00%	0.00%	0.00%	0.00%	41.00%	
53156AEMFM	5318003A	53100380	Budget Analyst 2	Trueblood	Carla	0.41	0.00%	0.00%	0.00%	34.94%	0.00%	5.69%	0.00%	0.00%	0.00%	0.00%	41.00%	
53156AEMFM			Financial Analyst	VACANT	-		0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
53159ENRGY	5318003A	53100386	Administrative Assistant	Stillwagon	Jenni	0.20	0.00%	0.00%	0.00%	17.47%	0.00%	2.84%	0.00%	0.00%	0.00%	0.00%	20.00%	
53156ADMIN	5318003A	53100459	Public Information Specialist	Davin	Moirra	0.20	0.00%	0.00%	0.00%	17.47%	0.00%	2.84%	0.00%	0.00%	0.00%	0.00%	20.00%	
<b>AEMD ADMIN TOTAL</b>						<b>1.63</b>												
5315AQB	5318137	53100433	Bureau Chief	Klemp	David	1.00	0.00%	10.00%	0.00%	30.00%	25.00%	0.00%	15.00%	10.00%	10.00%	0.00%	100.00%	
5315AQB		53193510	VACANT-Student Intern			1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
5315ADMIN	5318130	53100361	Administrative Support Supv	VACANT (Williams,B)		1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
5315ADMIN	5318106A	53100320	Program Support Specialist	Velasquez	Rina	1.00	0.00%	0.00%	15.00%	40.00%	10.00%	15.00%	0.00%	20.00%	0.00%	0.00%	100.00%	
5315ADMIN	5318107	53100387	Program Support Specialist	VACANT (Hansen)		1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
5315ADMIN	5318201A	53100494	Attorney-Charging to COMB	Christopherson	Sarah	0.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
5315APS	5318115C	53110110	Section Supervisor	Ulrich	Elizabeth	1.00	0.00%	0.00%	0.00%	25.00%	5.00%	20.00%	0.00%	25.00%	0.00%	25.00%	75.00%	
5315APS	5318120	53100322	Atmospheric Scientist	McGuire	Brandon	1.00	3.00%	30.00%	0.00%	17.00%	0.00%	0.00%	0.00%	50.00%	0.00%	0.00%	100.00%	
5315APS		53100355	Air Quality Planning Engineer PE	VACANT (Coe)		1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
5315APS	5318116A	53100358	Air Quality Meteorologist	Alexander	Katherine	1.00	0.00%	50.00%	0.00%	8.00%	0.00%	42.00%	0.00%	0.00%	0.00%	0.00%	100.00%	
5315APS	5318115B	53100374	Air Quality Planner	Callon	Katy	1.00	0.00%	10.00%	0.00%	0.00%	22.00%	0.00%	0.00%	68.00%	0.00%	0.00%	100.00%	
5315APS	5318115D	53100388	Air Quality Planner	Payne	Rhonda	1.00	0.00%	10.00%	0.00%	0.00%	22.00%	0.00%	0.00%	0.00%	0.00%	68.00%	32.00%	
5315APS	5318115A	53125001	Air Quality Assurance Manager	Grimm	Deborah	1.00	4.00%	0.00%	0.00%	16.00%	0.00%	0.00%	0.00%	30.00%	50.00%	0.00%	100.00%	
53151FS	5318122	53100357	Environmental Engineering Spc	Rash (Vacant 7/1/20)		1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
53151FS	5318140	53100342	Air Quality Scientist	Wilson	Karen	1.00	0.00%	0.00%	0.00%	80.00%	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	100.00%	
53151FS	5318133	53100376	Air Quality Engineer	Conner-Winn	Linda	1.00	0.00%	0.00%	0.00%	40.00%	40.00%	20.00%	0.00%	0.00%	0.00%	0.00%	100.00%	
53151FS	5318114A	53100495	Air Quality Engineer PD	Peterson	Mark	1.00	0.00%	0.00%	0.00%	80.00%	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	100.00%	
53151PS	5318121	53100311	Air Quality Engineer	Juers	Shawn	1.00	0.00%	0.00%	0.00%	80.00%	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	100.00%	
53151PS	5318131	53100391	Air Quality Engineer	Warner	Edward	1.00	0.00%	0.00%	0.00%	70.00%	0.00%	30.00%	0.00%	0.00%	0.00%	0.00%	100.00%	
53151PS	5318117A	53140050	Air Quality Scientist	Burrows	Troy	1.00	0.00%	0.00%	85.00%	0.00%	0.00%	15.00%	0.00%	0.00%	0.00%	0.00%	100.00%	
53151IDS	5318119	53151001	Air Quality Engineer	Vacant (Raty)		0.75	0.00%	0.00%	0.00%	30.00%	30.00%	15.00%	0.00%	0.00%	0.00%	0.00%	75.00%	
53151IDS	5318122	53151000	Program Manager	Grantham	Jamin	1.00	0.00%	0.00%	0.00%	40.00%	40.00%	20.00%	0.00%	0.00%	0.00%	0.00%	100.00%	
53151IDS	5318138	53100310	Computer Systems Analyst	Pisarsky	Anita	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	95.00%	5.00%	0.00%	0.00%	100.00%	
53151IDS	5318127	53100318	Database Analyst	VACANT (Davis)		1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
53151IDS	5318104A	53100373	Data Control Tech	Linkenbach	Debbie	1.00	0.00%	0.00%	10.00%	50.00%	30.00%	10.00%	0.00%	0.00%	0.00%	0.00%	100.00%	
53151IDS	5318109	53100375	Computer Systems Analyst	Dahlgren	Eric	1.00	0.00%	0.00%	10.00%	70.00%	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	100.00%	
53151OGS		53100394	Section Supervisor	Aguire (Vacant 7/1/20)		1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
53151OGS	5318118A	53100344	Air Quality Scientist	Majerus	Meghan	1.00	0.00%	0.00%	0.00%	40.00%	40.00%	20.00%	0.00%	0.00%	0.00%	0.00%	100.00%	
53151OGS		53100390	Air Quality Engineer	VACANT (Jurenic)		1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
53151OGS	5318103A	53151002	Air Quality Scientist	Lamborn	Sarah	1.00	0.00%	0.00%	0.00%	40.00%	40.00%	20.00%	0.00%	0.00%	0.00%	0.00%	100.00%	
53151OGS	5318128	53151004	Air Quality Engineer	VACANT (Steilman)		0.75	0.00%	0.00%	0.00%	30.00%	30.00%	15.00%	0.00%	0.00%	0.00%	0.00%	75.00%	
53151PS	5318142	53100396	Section Supervisor	Merkel	Julie	1.00	0.00%	0.00%	5.00%	40.00%	10.00%	30.00%	15.00%	0.00%	0.00%	0.00%	100.00%	
53151PS	5318111A	53100343	Air Quality Planner	Aguire	David	1.00	0.00%	0.00%	0.00%	15.00%	70.00%	15.00%	0.00%	0.00%	0.00%	0.00%	100.00%	
53151PS	5318108A	53151003	Air Quality Engineer PE	Henrikson	Craig	1.00	0.00%	0.00%	0.00%	90.00%	0.00%	10.00%	0.00%	0.00%	0.00%	0.00%	100.00%	
53151PS	5318110	53151005	Air Quality Scientist	Proulx	John	0.75	0.00%	0.00%	0.00%	56.25%	0.00%	18.75%	0.00%	0.00%	0.00%	0.00%	75.00%	
53151PS	5318126	53100354	Air Quality Scientist	Ackerlund	Julie	1.00	0.00%	0.00%	0.00%	75.00%	0.00%	25.00%	0.00%	0.00%	0.00%	0.00%	100.00%	
53151RMS	5318102A	53100412	Section Supervisor	Kuentzli	Douglas	1.00	2.00%	0.00%	0.00%	20.00%	0.00%	20.00%	3.00%	35.00%	20.00%	2.00%	100.00%	
53151RMS	5318125	53100313	Air Quality Monitor Lead	Zehntner	Steven	1.00	6.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	54.00%	40.00%	0.00%	100.00%	
53151RMS	5318123	53100321	Air Quality Monitor	Redder	Casey	1.00	16.00%	0.00%	0.00%	0.00%	14.00%	0.00%	0.00%	70.00%	0.00%	0.00%	100.00%	
53151RMS	5318110A	53100393	Air Quality Monitor	Rash	Hoby	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	50.00%	50.00%	0.00%	100.00%		
53151RMS	5318124	53125002	Monitoring Coordinator	Anderson	Carl	1.00	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	20.00%	75.00%	5.00%	100.00%		
53151RMS	531514741	53190063	Other/Prof-Prof	Stagl	Allan	0.53	0.00%	0.00%	0.00%	53.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	53.00%	
<b>AQB TOTAL</b>						<b>40.28</b>												
<b>GRAND TOTAL</b>						<b>41.91</b>												

03981	01100	02201	02201	02201	02201	02201	03262	03325	03262
BLM-Air Monitc	General Fu	Reg Portab	Title V Fee	Reg Oil & C	Minor Sou	Smoke Mg	Air-PPG	PM 2.5	Air-PPG
514705	514712	514717	514741	514743	514752	514761	514772	514776	514777
BLM-Air Monitc	General Fu	Reg Portab	Title V Fee	Reg Oil & C	Minor Sou	Smoke Mg	Air-PPG	PM 2.5	Air-PPG

**ATTACHMENT 4**  
**AQB ACCOUNTING REPORT**

## 53010 Dept of Environmental Quality Revenue/Expenditure Comparison by Fund, Org

Data Selected for Month/FY: 00 (Beg)/2020 through 12 (Jun)/2020

Business Unit	(All)
Program Year	2020
Fiscal Year	2020
Month	(All)
Subclass	(All)
Acct Lvl 1	(All)
Source of Auth	(All)
Account	(All)
OBPP Program	(All)
Fund Type	(All)
Acct Lvl 0	(All)
Account Type	(All)
Project	(All)
Ledger	ACTUALS

[Return to Menu](#)

Fund	Org	Acct Lvl 2	Revenues	Expenditures	Rev less Exp
02201	Air Quality-Operating Fees		3,928,029.90	2,874,663.33	1,053,366.57
	514707	AQB - County Contracts - Fees	0.00	30,637.44	(30,637.44)
		62100 Other Services	0.00	29,895.00	(29,895.00)
		62400 Travel	0.00	0.00	0.00
		62800 Other Expenses	0.00	742.44	(742.44)
	514717	AQB - Reg Portables - Fees	0.00	57,280.08	(57,280.08)
		61100 Salaries	0.00	32,234.84	(32,234.84)
		61400 Employee Benefits	0.00	13,216.91	(13,216.91)
		62800 Other Expenses	0.00	11,828.33	(11,828.33)
	514741	AQB - Title V - Fees	2,094,545.03	1,689,927.35	404,617.68
		500000 Licenses & Permits	2,094,177.60	0.00	2,094,177.60
		530000 BOI Investment Earnings Class	(100.99)	0.00	(100.99)
		540000 Fines/Forfeits	(11.28)	0.00	(11.28)
		580000 Grants/Transfers/Misc	479.70	0.00	479.70
		61100 Salaries	0.00	953,702.65	(953,702.65)
		61400 Employee Benefits	0.00	334,204.26	(334,204.26)
		62100 Other Services	0.00	12,315.80	(12,315.80)
		62200 Supplies & Materials	0.00	6,148.02	(6,148.02)
		62300 Communications	0.00	10,049.13	(10,049.13)
		62400 Travel	0.00	12,532.83	(12,532.83)
		62500 Rent	0.00	38,681.48	(38,681.48)
		62700 Repair & Maintenance	0.00	147.15	(147.15)
		62800 Other Expenses	0.00	322,146.03	(322,146.03)
	514743	AQB - Reg Oil & Gas - Fees	1,036,600.00	704,642.64	331,957.36
		500000 Licenses & Permits	1,036,600.00	0.00	1,036,600.00
		61100 Salaries	0.00	374,294.40	(374,294.40)
		61400 Employee Benefits	0.00	133,679.58	(133,679.58)
		62100 Other Services	0.00	23.00	(23.00)
		62200 Supplies & Materials	0.00	249.25	(249.25)
		62300 Communications	0.00	3,147.54	(3,147.54)
		62400 Travel	0.00	5,529.62	(5,529.62)
		62500 Rent	0.00	43,561.57	(43,561.57)
		62600 Utilities	0.00	3,936.11	(3,936.11)
		62700 Repair & Maintenance	0.00	14,062.00	(14,062.00)
		62800 Other Expenses	0.00	126,159.57	(126,159.57)
	514752	AQB - Minor Source - Fees	666,891.10	306,066.60	360,824.50
		500000 Licenses & Permits	666,891.10	0.00	666,891.10
		61100 Salaries	0.00	181,757.28	(181,757.28)
		61400 Employee Benefits	0.00	64,502.77	(64,502.77)
		62100 Other Services	0.00	200.00	(200.00)
		62300 Communications	0.00	160.44	(160.44)
		62400 Travel	0.00	312.56	(312.56)
		62800 Other Expenses	0.00	59,133.55	(59,133.55)
	514761	AQB - Smoke Mgmt - Fees	129,993.77	86,109.22	43,884.55
		500000 Licenses & Permits	129,993.77	0.00	129,993.77
		61100 Salaries	0.00	50,566.76	(50,566.76)
		61400 Employee Benefits	0.00	18,169.25	(18,169.25)
		62300 Communications	0.00	842.49	(842.49)
		62400 Travel	0.00	0.00	0.00
		62800 Other Expenses	0.00	16,530.72	(16,530.72)
<b>Grand Total</b>			<b>3,928,029.90</b>	<b>2,874,663.33</b>	<b>1,053,366.57</b>

**ATTACHMENT 5**  
**AQB CHECK CODING DOCUMENT**

**AQB  
REVENUE - CHECK CODING  
FUND - 02201**

<b>REVENUE ACCOUNT CODE APPLICATIONS</b>					
<b>ORG UNIT</b>	<b>Source Type</b>	<b>New Permit Application Fee Amount</b>		<b>Modified Permit Application Fee Amount</b>	
514741 - TITLE V	A	506004	Title V Application Fee	\$6500	506004 Title V App Fee (Renewal) \$2,000
					506004 Title V App Fee (sig mod) \$1,500
514741 - TITLE V	NSR/PSD	506012	Major Application Fee	\$15,000	506012 Major Mod Application Fee \$3,500
					506012 Minor Mod Application Fee \$500
514741 - TITLE V	A	506012	Major Application Fee	\$2,000	506012 Major Application Fee \$1,500
514741 - TITLE V	SM	506013	SM MAQP Application Fee	\$1,000	506013 SM MAQP Application Fee \$500
514752 - NON-TITLE V	B	506073	Minor MAQP App Fee	\$800	506073 Minor MAQP App Fee \$500
514752 - NON-TITLE V	B (portable)	506073	Minor MAQP App Fee	\$500	506073 Minor MAQP App Fee \$500
514743 - AQB OIL & GAS		506074	O&G Application Fee	\$500	NA NA

<b>REVENUE ACCOUNT CODE OPEN BURNING</b>			
<b>ORG UNIT</b>	<b>Source Type</b>	<b>New Permit Application Fee Amount</b>	
514752 - NON-TITLE V		506014	Open Burning
			Firefighter Training \$25
			Conditional (Trade Waste & Landfil), Christmas Tree Waste, & Commercial Film Production \$100
514761 - FEES SMOKE MGMT		506011	Smoke Management fee set by calc.

**Source Type**  
**A = Title V Source**  
**B = Non Title V Source**  
**SM = Synthetic Minor Source**

<b>ACCOUNT</b>	<b>DESCRIPTION</b>	<b>ORG</b>	<b>DESCRIPTION</b>
506004	Title V app fee	514741	AQB Title V Fees
506011	Non Title V Smoke Management	514761	AQB Smoke Mgmt Fees
506012	Title V Major Application Fee	514741	AQB Title V Fees
506013	Title V SM MAQP App Fee	514741	AQB Title V Fees
506014	Non Title V Open Burning	514752	AQB Minor Source Fees
506074	O&G Application Fee	514743	AQB Reg Oil & Gas Fees
506073	Minor MAQP App Fee	514752	AQB Minor Source Fees



**ATTACHMENT 6**  
**PPG MATCH DOCUMENT**

## PPG Match

In fiscal years 2015 through 2020, the Montana Department of Environmental Quality received \$5,364,070 from EPA grant funding which requires a match of \$3,576,047. The Department, collected enough non-title V fee revenue to cover the required match. No Title V fee revenue is used to match.

	<b>PPG</b>	<b>Required Match</b>	<b>Non-Title V Fee Revenue</b>
Totals	\$ 5,364,070	\$ 3,576,047	\$ 6,937,207
514743 - NON TITLE V O&G OPERATING-02201			\$ 3,986,882
514752 - AIR QUALITY NON-TITLE V-02201			\$ 2,452,636
514761 - FEES-SMOKE MANAGEMENT - 02201			\$ 497,689

The orgs/accounts for air PPG match are as follows:

<b>ORG UNIT</b>	<b>REVENUE ACCOUNT CODE</b>	<b>SOURCE TYPE</b>
<b>514743</b> - ARMB OIL & GAS PERMITS	<b>506027</b> Non Title V O&G Operating Fee	Non-Title V
	<b>506074</b> O&G Application Fee	Non-Title V
<b>514752</b> - NON-TITLE V	<b>506014</b> Open Burning	Non-Title V
	<b>506073</b> Minor MAQP App Fee	Non-Title V
	<b>506075</b> Minor Operating Fee	Non-Title V
<b>514761</b> - FEES SMOKE MGMT	<b>506011</b> Non Title V Smoke Management	Non-Title V

**ATTACHMENT 7**  
**AIR QUALITY BUREAU (AQB) ORGANIZATION CHART**

