

February 4, 2020

On January 2, 2019, EPD issued a web announcement requesting stakeholder input on the draft for proposed revisions to the Georgia Rules for Air Quality, Chapter 391-3-1. The draft of the proposed changes included the following:

- **Rule 391-3-1-.03(9), “Permit Fees,”** is being amended to increase permit fees
- **“Air Permit Fees” Manual,** a guide to fee procedures that is referenced by the aforementioned paragraph, is being amended to increase permit fees

A stakeholder meeting was held at 10:00 a.m. on January 17, 2020, in the EPD Training Center located at 4244 International Parkway, Suite 116, Atlanta, Georgia 30354. Comments were requested by January 24, 2020. No written comments have been received to date. The next page lists stakeholder questions and EPD responses provided at the meeting.

Compilation of Stakeholder Questions (in order of occurrence)

Question/Comments	Response Provided
Will we be able to access the slideshow?	<p>EPD Comment: Yes, we will post it on the website along with the permit fees</p> <p>Link: https://epd.georgia.gov/air-protection-branch-technical-guidance-0/types-air-quality-permits/air-permit-fees</p>
Are there more Coal Plants retiring in the future?	<p>EPD Comment: It is always a possibility. EPD tries to account/address for that.</p>
How many Coal Plants does Georgia have now?	<p>EPD Comment: There are three left. None of those are slated for retirement in the next couple of years.</p>
How long does retirement of a Coal Plant take?	<p>Georgia Power response: Retirement needs to be approved through an Integrated Resource Plan (IRP) process, which occurs every three years.</p> <p>EPD Comment: Once revoked, it will be the following fee year that they are not paying annual emissions fees.</p>
On slide 18 “Impact of Proposed Adjustments: Why is the Title V fee group listed twice?	<p>EPD Response: The first “Title V \$/ton” fee group is not subject to NSPS. The second “Title V \$/ton + NSPS” fee group is for Title V sources that also pay the NSPS fee.</p>
Are Nuclear Power Plants charged a fee?	<p>EPD Response: They are subject to Title V fees. Emissions are not particularly high. They usually pay a minimum fee for emergency backup generators.</p>
<p>EPD Comment: The number of Title V permits has dropped over the years. Emissions have declined dramatically. EPD needs to adjust for this fee shortfall. Until now, \$/ton fees were the way to go.</p>	
Does the state own this building?	<p>EPD Response: It is a long-term lease.</p> <p>Comment from Stakeholder: The building may be an opportunity to save money.</p>
	<p>GA Industrial Environmental Coalition Representative comment: We are required to support Title V. It is important to make sure these permitting processes go expeditiously as possible to attract business to the State. It is a balance.</p>

Question/Comments	Response Provided
What market sectors are Georgia involved in?	EPD Response: Georgia has a wide range of industry: Hospitals, Landfills, Manufacturing, Power Plants
EPD Comment: There are 2,700 air quality permits. 360 are Title V permits.	
Do Infrastructure Pipelines pay a fee?	EPD Response: Pipelines are not charged a fee. They have compressor stations and those get permitted. As for liquid service, the tank farms have air quality permits.
Question to Georgia Power: Is most of the displacement from Closed Coal Plants going to natural gas?	Georgia Power Response: Displacement is going to natural gas and renewables. EPD Comment: Renewables do not have air permitting needs.
On slide 15 “Current Workload Breakdown”: What requires time of Title V permits?	EPD Response: All Title V permits must be renewed every 5 years. Pulp and Paper make a lot of permit changes. There are other Power Plants beside GA Power. Title Vs need modeling, and they have inspections more often. They also have more paperwork to be reviewed.
What is the \$/year on Title Vs?	EPD Response: Now the \$/ton is about ~\$5-6 million. (Slide 5 shows Calendar Year 2017 total fees for each fee group.)
Is the renewal of Title V permits every 5 years required or can it be extended?	EPD response: The duration of 5 years is required by Federal Regulations (40 CFR Part 70).
Do the fees go toward testing, modeling, and inspection?	EPD response: Yes, also emission inventories, SIP work, stack test and report reviews, inspections and monitoring.
Is monitoring all EPD or also supplemented by EPA?	EPD response: EPD does get grant money from EPA, but all the monitoring itself is done by EPD.
You mentioned that 7 states have higher fees. After these proposed changes, is this still true?	EPD response: The 7 states were used as reference to \$/ton fees (Slide 14) which EPD is not changing. The application fees are now in line with the others.
Was VA always at \$83.96/ton?	EPD response: No, that was recently increased in 2019. Before it increased, it was in the \$70s.
Does VA have similar industries/breakdown as Georgia?	EPD response: Yes. However, their programs are split throughout the state. EPD Comment: EPA gives a recommended \$/ton every year. We are well below.

Question/Comments	Response Provided
If we set \$/ton to EPA’s recommendation, what would that do?	EPD Response: It would probably double Title V fee collection.
EPD Comment: With this rule update, EPD is trying to make the fees equitable based on the work the Air Branch does for all sources because currently the Title V sources are shouldering the burden of paying for the work done with SM and B sources. However, if more sources reduced emissions, then we would be back to increasing the \$/ton again.	
Is there a maximum fee?	EPD response: \$4,000 tons/year per pollutant
Is this maximum fee common with other states?	<p>EPD response: Yes</p> <p>EPD Comment: Some States charge for HAPS, but Georgia does not.</p> <p>EPD Comment: EPD is trying to balance the work we do and align it with fee collections. This permit rule change doesn’t correlate with \$/emissions since that is not changing.</p>
Emissions vs Revenue slide (slide 13) - Asked for Clarification on Emissions and I/M Fee revenue	EPD response: In the first pie chart “Georgia Emissions,” the emissions are statewide. In the second and third pie chart, I/M fees are from only 13 counties.
Stakeholder Comment: We appreciate you putting this together.	EPD Comment: EPD wants to show what we are doing. We want to demonstrate that we are being good stewards.