Air Quality Permit Program
Emission Fee
Appropriations Report

Presented to
Appropriations Committee
of the Legislature

By the
Department of Environment and Energy

NEBRASKA
DEPT. OF ENVIRONMENT AND ENERGY

November 20, 2020

Table of Contents

TABLE OF CONTENTS 2

INTRODUCTION 3

EMERGING ISSUES 3

A. NATIONAL AMBIENT AIR QUALITY STANDARDS & CROSS-STATE POLLUTION 3
B. GREENHOUSE GAS PERMITTING 5
C. CLEAN POWER PLAN / AFFORDABLE CLEAN ENERGY 5
D. REGIONAL HAZE 5

DEFINITIONS 6

DIRECT AND INDIRECT COSTS 8

A. FEES ASSESSED 8
Table 1: Fees Collected 8
B. GENERAL DISCUSSION OF PROGRAM COSTS 8
Table 2: Title V Program Costs by Budget Category 8

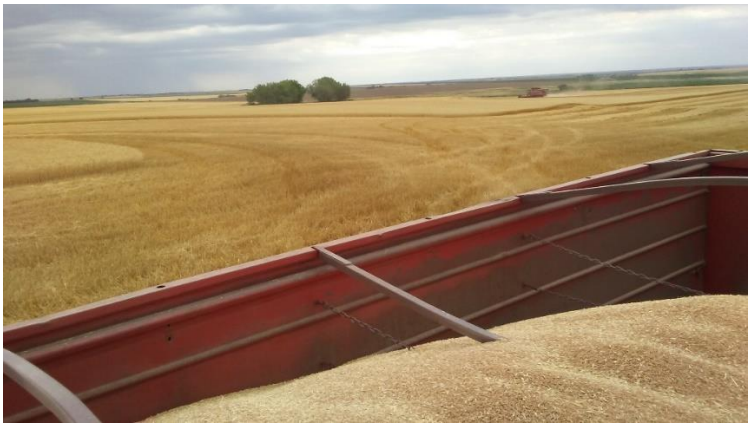
PRIMARY ACTIVITY COSTS 9

A. PAYROLL AND FINANCIAL CENTER SYSTEM 9
B. COSTS BY PRIMARY ACTIVITY 10
Table 3: Costs by Primary Activity 10
C. COSTS SPECIFIC TO CLASS I MAJOR SOURCES 11
Table 4: Costs by Class I Major Source 11
D. SECTOR-SPECIFIC COSTS 15
Chart 1: Title V Costs by Sector (Percentage) 15

Introduction

The Department of Environment and Energy submits this report to the members of the Appropriations Committee of the Nebraska Legislature, pursuant to Neb. Rev. Stat. §81-1505.04, as amended. This report details all direct and indirect program costs incurred during the State Fiscal Year 2020 (SFY 2020) in carrying out the air quality permit program. The permit program is the result of the Federal Clean Air Act Amendments of 1990 (CAAA) and the passage of LB1257 (1992) by the Nebraska Legislature. The department is required to establish and implement a comprehensive operating permit program for major sources of certain air pollutants. The federal program is referred to as the Title V program. The State of Nebraska's "Title V program" is often referred to as the Class I program.

Pursuant to the provisions of §81-1505.04, the department is required to collect an annual fee on the emissions from major sources of air pollution in an amount sufficient to cover the costs of the implementation of the permit program. The statute provides flexibility to develop and adjust the fee according to federal regulation or "as required to pay all reasonable direct and indirect costs of developing and administering the air quality permit program." The State's Payroll and Financial Center system is utilized to document time and resources spent on the program. The purpose of this report is to document the revenue generated from emission fees and identify costs associated with the program. In addition, as required by statute, this report identifies the costs incurred by the department to administer the program for each major source and each primary activity not specific to a major source. This report verifies that revenue generated from emission fees was used by NDEE solely to offset appropriate and reasonable costs associated with the air quality permit program.



Hitchcock County

Emerging Issues

A. National Ambient Air Quality Standards and Cross-State Pollution

Pursuant to the Clean Air Act, EPA must review the National Ambient Air Quality Standards (NAAQS) every five years. The purpose of these standards is to protect public health, welfare and the environment. Pollutants regulated by these standards include ozone (O_3), lead (Pb), particulate matter (PM), carbon monoxide (CO), nitrogen dioxide (NO_2), and sulfur dioxide (SO_2); Nebraska is currently in attainment (compliance) with all six standards. Pending actions affecting Nebraska include:

2010 SO_2 NAAQS

The 2010 sulfur dioxide (SO_2) standard requires states to demonstrate attainment in the areas surrounding large sources of this pollutant. NDEE submitted Nebraska's designation recommendation of "attainment" for the areas surrounding three major sources to EPA in 2015. EPA designated two of these sources as in

attainment in 2016; the third (Sheldon Station in Lancaster County) was designated unclassifiable, and required further characterization. Nebraska's SIP for this NAAQS was submitted to EPA in 2013.

As a supplement to the 2010 SO_2 standard, EPA finalized the Data Requirements Rule (DRR) in 2015 to assist in implementation of the 2010 standard. This rule requires air quality agencies to characterize the air quality near sources that emit 2,000 tons per year or more of SO_2 by the use of air quality monitoring or pollutant dispersion modeling, or adopt enforceable SO_2 emission limits not to exceed 2,000 tons per year for the affected sources. Sources in the state subject to this rule are coal-fired power plants and included Whelan Energy Center (Adams County), Sheldon Station (Lancaster County), North Omaha Station (Douglas County), Gerald Gentleman Station (Lincoln County), and Nebraska City Station (Otoe County).

Areas surrounding Gerald Gentleman Station and Nebraska City Station were characterized by modeling, and EPA designated them as "unclassifiable/attainment" in 2016. The area around Whelan Energy Center was characterized by modeling and designated as "attainment/unclassifiable" by EPA in 2018. Air quality monitors were installed near Sheldon Station and North Omaha Station and began operation in January 2017. Monitoring was completed in 2019 and a designation recommendation for these areas was submitted to EPA in May 2020. EPA has proposed designations of "attainment/unclassifiable" for both areas; final designations will be promulgated by December 31, 2020

The DRR requires an annual report (termed "ongoing requirements") for areas characterized by modeling, and this year's report was submitted in June 2020. Two facilities are subject to these ongoing requirements: Whelan Energy Center and Gerald Gentleman Station. Facility emissions data indicate that both areas continue to demonstrate attainment with the federal standard.

EPA conducts a comprehensive review of the NAAQS for each pollutant every five years. As these standards are continually subject to being lowered, maintaining the state's attainment status may prove to be a challenge. In April 2019, EPA retained the current primary (health-based) SO_2 NAAQS. In the event Nebraska should be designated non-attainment (not in compliance) with a NAAQS, the state will be required to develop a strategy to return to compliance (typically within a timeframe of 3 to 5 years) and sustain on-going compliance thereafter. The impact of a non-attainment designation would potentially create challenges for existing industry to expand and may dissuade new industry from coming into the impacted parts of the state.

Because emissions from one state can sometimes cause or contribute to air pollution issues in a downwind state, EPA issued the Cross-State Air Pollution Rule (CSAPR) to address interstate transport. At the present time, NDEE is finalizing a SIP revision to address transport elements of the 2010 SO_2 SIP. When the SIP was originally submitted to EPA in 2013, these elements were addressed by reliance on a memo from former EPA Administrator Gina McCarthy; this memo was rendered void following implementation of the rule. The draft SIP revision addressing interstate transport of SO_2 is on public notice and will be submitted to EPA following the comment period and hearing (if requested). An analysis of Nebraska sources of SO_2 and their potential for impacts on neighboring states was conducted and it was determined that emissions from Nebraska sources don't interfere with adjacent states' ability to maintain or comply with the NAAQS.

B. Greenhouse Gas Permitting

As a result of a U.S. Supreme Court decision in 2007 (Massachusetts v EPA), EPA was required to evaluate whether greenhouse gas (GHG) emissions were endangering public health and, if so, whether vehicle emissions significantly contributed to such endangerment. GHGs include carbon dioxide,

methane, ozone, and nitrous oxide. Under the Clean Air Act, EPA has been developing GHG emission regulation and promulgated a mandatory reporting rule in October 2009 for sources with emissions over 25,000 tons per year, establishing the EPA Greenhouse Gas Reporting Program. Reporting began in 2011 for calendar year 2010 emissions.

EPA also promulgated GHG permitting rules under the Title V operating permit program and the federal prevention of significant deterioration (PSD) permit program in June 2010. EPA expected states to incorporate the revised rules into their programs by January 2, 2011; Nebraska adopted these revised rules at the December 2010 Environmental Quality Council (EQC) hearing. In June 2014, the U.S. Supreme Court partially overturned the GHG permitting rules, stating that EPA may not treat GHGs as an air pollutant for purposes of determining whether a major source is subject to obtain a PSD or Title V permit. A source must otherwise be subject to obtain a permit due to other pollutants. In August 2016, EPA proposed revisions to the GHG permitting rules pursuant to the U.S. Supreme Court decision, but a final rule has yet to be issued.

C. Affordable Clean Energy Rule

In August 2018, EPA proposed the Affordable Clean Energy (ACE) Rule, which became final on July 8, 2019. This rule included three separate rulemakings: 1) repeal of the Clean Power Plan; 2) establishment of emission guidelines for states to use when developing plans to limit greenhouse gas emissions at power plants, and 3) determination that Heat Rate Improvement is the best system for reducing greenhouse gas emissions from coal-fired power plants. There are currently 12 designated EGU units in the State of Nebraska that are subject to the ACE rule.

The Department has begun developing the implementation plan required by this rule. As part of the 111(d) plan development process, the Department has met with managers of the each designated EGU on eight occasions to discuss plan development. A request for information was sent to the owners and operators of each EGU on March 10, 2020 to obtain information from the facilities that must be included in the plan. The Department has received data from each facility and plans to continue consultations to further develop the plan.

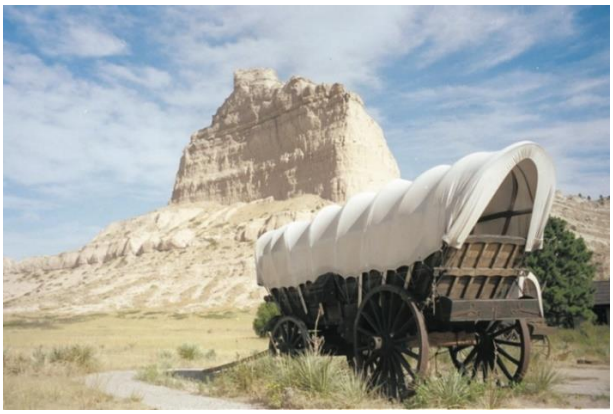
D. Regional Haze

Regional Haze refers to impaired visibility due to particulates and industrial gases in the atmosphere. EPA issued the Regional Haze Rule in 1999 to improve visibility in national parks and wilderness areas. The rule requires that state and federal agencies work together to achieve this goal. Numerous amendments to the Rule have been issued addressing the Cross-State Air Pollution Rule (CSAPR) as an alternative to Best Available Retrofit Technology (BART) for particular pollutant sources, and regulatory requirements for state implementation plans. In addition, recent guidance and technical support documents are available to assist states in preparing State Implementation Plans (SIPs) for the second implementation period (2018-2028).

Nebraska submitted its Regional Haze SIP for the first implementation period (2008-2018) in July 2011; in 2012, EPA issued a partial approval/partial disapproval of the SIP. The disapproved portions include the BART determination for sulfur dioxide for Gerald Gentleman Station and the state's long-term strategy for regional haze insofar as it relied on the BART determination. The disapproved portions will be addressed in the forthcoming SIP revision. This source participates in the CSAPR trading program, which allots each source an emissions budget for SO_2 and permits trading of allotments. Emissions to

date from this source have been within the allotted SO_2 budget under CSAPR, and no additional control measures have been required.

The Department submitted its Regional Haze Five-Year Progress Report in April 2017. At present, the Division is developing its SIP revision for the second implementation period which is due to EPA in July 2021. This SIP revision will address portions of the initial SIP and progress report, as well as state obligations for the current implementation period.


Eagle Rock

Definitions

For the purposes of this report, the following definitions have been used:

Chargeable emissions: The total tonnage of regulated pollutants emitted from a major source up to and including any applicable caps. A cap of 4,000 tons per regulated pollutant applies to all major sources. A cap of 400 tons per pollutant applies to mid-size electrical generation facilities that are not under jurisdiction of a local air program and that have a nameplate capacity of between 70 and 115 megawatts.

Class I – Major Source: An air emissions source permitted to emit annually 100 tons or more of PM10, CO, NOx, SOx, or VOC; 10 tons or more of any single HAP; 25 tons of any combination of HAPs. Until the U.S. Supreme Court partially overturned the GHG permitting rule June 2014, a source with emissions of 100 tons or more of greenhouse gases on a mass basis and 100,000 tons of carbon dioxide equivalents were also considered major sources. The court ruled that EPA may not treat GHGs as an air pollutant for purposes of determining whether a source is subject to federal permitting rules. Such sources with emissions above the thresholds are required to obtain a Class I operating permit. Some other source categories are required to obtain a Class I operating permit because of other federal requirements.

Class II – Synthetic Minor Source: A source that has a potential to emit to be a major source, but through enforceable limits has lowered its potential to emit to below the major source thresholds. A synthetic minor source must either obtain a Class II permit or qualify for the Low Emitter Program. Synthetic minor sources are not assessed emission fees.

Compliance Assurance: Assuring compliance includes activities such as conducting facility inspections, responding to complaints, stack test observations, file reviews, voluntary compliance, and enforcement.

Direct costs: Direct program costs are those costs incurred through the direct implementation of the Title V program. Examples include: costs of permit writing and review labor, staff development, training, inspector salaries and travel expenses, air monitoring equipment purchases, regulation development, small business assistance, and computer modeling software purchases.

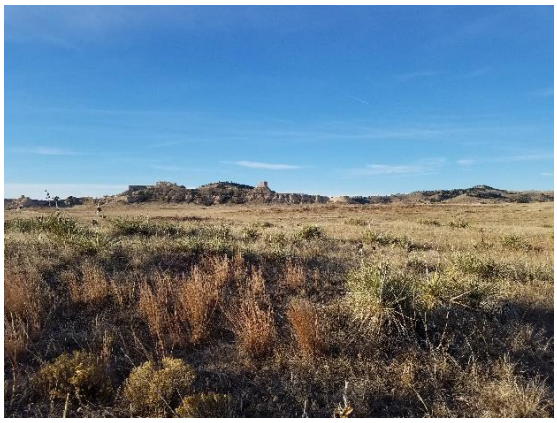
Indirect costs: Indirect costs are the programs share of costs incurred by the department that benefit the entire agency. Examples include: building rent, costs of certain administrative labor such as the director, the deputy directors, and general data management.

Low Emitter Source: A source that has a potential to emit to be a major source, but has demonstrated through records and emission inventories for at least 5 years a history of actual emissions not exceeding 50% of major source thresholds for regulated pollutants and that is not otherwise required to obtain a permit.

Non Source-Specific Costs: Those costs not specifically attributable to a single source. Examples include: resources required for review of federal regulations, resources required for participation in national organizations, small business assistance, labor for drafting a general air permit, and ambient air monitoring in areas of multiple sources.

Primary Activity: A main functional area of the air program. Examples of primary activities include: permitting, small business assistance, emission inventory, state regulation and program development, compliance assurance, federal policy and rulemaking, and acid rain.

Source-Specific Costs: Those costs specifically attributable to a single source. Examples include: labor for drafting an operating permit for a single source, labor for inspecting a single source, and cost of publishing a public notice for a permit.


Banner County

Direct and Indirect Costs – SFY2020

A. Fees Assessed

Major source emissions were first subject to fees for calendar year 1994 emissions. The following table details the fee rates for the last several years, the date those fees were due, how much was collected, and which fiscal year the fees were intended to fund.

Table 1: Fees Collected

Emission Inventory Year	Fee Rate per Ton of Pollutant	Fee Due Date	Fees Collected[1]	Fiscal Year Funded
2010	$66	July 1, 2011	$2,566,717	SFY2012
2011	$64	July 1, 2012	$2,640,609	SFY2013
2012	$65	July 1, 2013	$2,588,903	SFY2014
2013	$67	July 1, 2014	$2,738,257	SFY2015
2014	$70	July 1, 2015	$2,832,625	SFY2016
2015	$71	July 1, 2016	$2,719,339	SFY2017
2016	$78	July 1, 2017	$2,958,887	SFY2018
2017	$78	July 1, 2018	$3,113,731	SFY2019
2018	$70	July 1, 2019	$2,923,715	SFY2020
2019	$65	July 1, 2020	$2,589,616	SFY2021

B. General Discussion of Program Costs

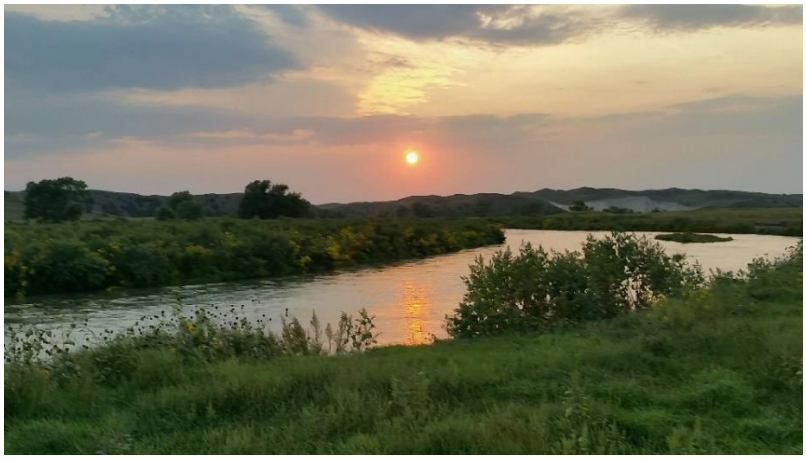
The department's SFY2020 estimated expenditures (budget) was $3,451,661 for the Title V program. The department expended $2,546,036, or approximately 74% of the budget. Table 2 provides a summary of SFY2020 Title V budgeted costs.

Table 2: Title V Budgeted Costs for SFY2020

(July 1, 2019 - June 30, 2020)

Category	Title V Budgeted Costs
Personnel	949,764
Benefits	469,401
Contractual	199,934
Supplies	8,173
Other	59,125
Travel	28,369
Equipment	0
Total Direct Costs	2,714,766
Total Indirect Costs	736,895
Total Costs:	**$ 3,451,661**

[1] Fees collected reflect late payment fees and updates to the emissions inventory that may have occurred after the initial submittal was filed.



Middle Loup near Thedford

Primary Activity Costs

A. Payroll and Financial Center System

The department is required to establish a system that provides reporting of resources expended on the primary components of the air quality program, as well as resources expended for each major source. Use of a tracking system commenced in July 1996.

Under the Payroll and Financial Center system, program activities are either charged to the Title V (Class I) program, the "state" program, the federal 103 program, or to the construction permit application fee program. The emission fees paid by major sources fund the Title V program. The "state" program refers to the 105 grant program, which is funded by federal funds and state general funds. The federal 103 program is funded wholly by federal funds and is utilized only for maintaining the $PM_{2.5}$ (particulate matter with an aerodynamic diameter of less than 2.5 microns) ambient monitoring network. The construction permit application fee program was enacted by the legislature during the 2004 session (LB449) and began January 1, 2005. When applying for an air quality construction permit, the owner or operator of the facility must submit an application fee. The fees collected under the construction permit program are used toward paying some of the costs of processing the application. There are currently no fees charged to sources for air quality operating permits.

All time spent by staff on the Title V program is recorded as program activity on timesheets in the Payroll and Financial Center system. The Title V program includes activities associated with major sources and synthetic-minor sources. Permit, planning, and compliance program staff document time by primary activity and by specific source or non-source specific activities. An example of how the Title V program activities are tracked follows:

33 - 560 - 008223

Indicates which fund time is to be charged (Ex. Title V program)

Indicates the primary activity (ex. Class I – major source permitting)

Indicates whether the time is for a specific source or for a non-source specific activity (ex. FLEXcon Company, Inc.)

B. Costs by Primary Activity

The following table details the Title V air program costs for SFY2019 by primary activity:

Table 3: Costs by Primary Activity SFY2020
(July 1, 2019- June 30, 2020)

Time Tracking Code	Primary Activity	Agency Program Costs
001; 115; 119; 120; 121; 123; 124; 128; 130; 607	Administration/Management	$ 321,509
002	General Office	145,870
100	Outside Meeting	8,530
103; 111; 567; 568; 592	Compliance / Complaints / Enforcement	516,316
106; 554; 608	Environmental Data Collection/ Ambient Air Monitoring	20,642
112; 555; 564; 565; 604; 113	Rules & Regulations / Legislation	101,642
114; 606	Training	160,824
116; 122	Process Improvement / Application Development	33,347
125	Legal Advice	0
170	Hazards (Floods)	3,382
553; 594; 605	Air Emission Inventory	92,897
559; 600	Small Business Assistance / Title V/Class II – Compliance Assistance/Outreach	46,402
566; 590; 101	Construction Permit	342,629
591; 560; 561; 562; 570	Operating Permit	427,863
593; 603	Modeling	49,882
596	Monitoring Mercury	9,476
601	Air 105/Title V – Compliance Office Activities	96,165
602	Air 105/Title V – Planning Office	24,902
610	Air 105/Title V – Construction Permit Office	60,693
611	Air 105/Title V – Operating Permit Office	56,489
612	Air 105/Title V – NO FID/Permit	26,575
	TOTAL	**$ 2,546,036**

C. Costs Specific to Class I Major Sources

Table 4 contains the costs the agency incurred that were specific to individual Class I major sources.

Table 4: Costs by Class I Major Source SFY2020
(July 1, 2019 - June 30, 2020)

Facility Name	Facility Location	Facility ID	Time Tracking Code	Total Agency Costs
A-1 Fiberglass	Hastings	723	008366	$ 225.18
A-1 Fiberglass	Aurora	85312	008917	157.61
ADM Corn Processing	Columbus	39285	008206	19,190.81
AGP Soy Processing	Hastings	72698	008794	24,491.00
Archer Daniels Midland Co	Fremont	9169	008265	175.51
Ash Grove Cement Co	Louisville	4129	004504	6,709.89
BD Medical Systems	Columbus	38719	008383	3,517.64
Bertrand Compressor Station	Loomis	88547	010189	1,642.89
Bimbo Bakeries USA, Inc	Bellevue	59056	008471	1,393.96
Burgess Well Company	Minden	27639	007332	3,316.96
Butler County Landfill, Inc	David City	62743	008812	810.24
C.W. Burdick Gen. Station	Grand Island	54712	008429	243.32
Cargill Ag Horizons	Albion	1446	008310	77.61
Cargill Inc Polyol Sweeteners	Blair	64401	008787	4,634.84
Cargill Lactic Acid Plant	Blair	91164	010294	4,481.09
Cargill, Inc	Blair	57902	008296	58,334.45
Chief Ethanol Fuels, Inc	Hastings	58049	008315	41,986.52
City of Wayne	Wayne	47263	008426	648.32
Clean Harbors Environmental Services, Inc	Kimball	58562	008319	16,248.61
CNH Industrial America, LLC	Grand Island	24371	008395	591.54
David City Municipal Power	David City	4016	008300	1,179.78
Douglas County Recycling Landfill	Bennington	62593	008467	8,627.49
Douglas County Landfill	Omaha	59516	008244	2,693.62
Dutton-Lainson Co	Hastings	125	008374	5,703.60
E Energy Adams LLC		86373	010021	8,282.17

Facility Name	Facility Location	Facility ID	Time Tracking Code	Total Agency Costs
Eaton Corporation	Kearney	2374	008545	11,713.91
Endicott Clay Products	Endicott	27355	008389	7,376.61
Enron Natural Gas	Palmyra	37514	008325	1,520.93
Excel Corp	Schuyler	6272	008524	8.19
Exmark Manufacturing Co	Beatrice	23151	009016	1,461.67
FLEXcon Company, Inc	Columbus	58429	008223	7,433.98
Flint Hills Resources Fairmont	Fairmont	86026	010000	15,094.11
G & P Development, Inc Landfill	Milford	45275	008825	2,697.31
Global Equipment Company, Inc	Norfolk	53804	008936	0
Goodyear Tire	Norfolk	53867	008391	70.56
Grand Island Burdick Station	Grand Island		54712	846.77
Grand Island Platte Gen Station	Grand Island		58027	6,529.54
Grand Island Regional Landfill	Shelton	62812	008809	35.28
Green Plains Atkinson, LLC	Atkinson	86416	010027	6,554.98
Green Plains Central City, LLC	Central City	82836	009032	8,206.17
Green Plains Ord, LLC	Ord	85861	009091	3,432.17
Green Plains Wood River, LLC	Wood River	86000	009094	15,373.84
Green Plains	York	59094	008291	11,054.97
Hastings Utility – Don Henry	Hastings	58345	008530	219.58
Hastings Utility – N. Denver	Hastings	55721	008339	142.68
Hastings Utility – Whelan Energy	Hastings	58048	008338	10,059.37
Huntsman	Sidney	5456	008392	2,206.35
IBP	Lexington	8744	008432	7,523.86
J Bar J Landfill	Ogallala	63354	008826	2,944.46
KAAPA Ethanol	Ravenna	77854	009013	15,218.40
KANEB Pipeline	Geneva	22282	008343	0
KANEB Pipeline	Columbus	39527	008345	112.79
KANEB Pipeline	Osceola	58738	008482	0
KN Energy	Lexington	8669	008437	5,081.79

Facility Name	Facility Location	Facility ID	Time Tracking Code	Total Agency Costs
KN Int. Gas	Albion	1416	008475	704.68
KN Int. Gas	Holdrege	38270	008476	3,684.74
KN Int. Gas	North Platte	58735	008477	5,061.99
KN Int. Gas	Grand Island	24673	008479	1,012.10
Koch Fertilizer Beatrice, LLC	Beatrice	23383	008411	2,098.16
Lon D Wright Power Plant	Fremont	48518	008350	6,809.27
Natural Gas	Beatrice	23034	008435	4,371.68
Natural Gas	Otoe	37669	008470	140.67
Naturally Recycled Proteins	Wakefield	80265	009061	1,357.56
NatureWorks, LLC	Blair	69585	008857	3,786.28
Nebraska City Power Plant # 1	Nebraska City	37388	008353	1,830.23
Nebraska City Power Plant # 3	Nebraska City	64753	009004	2,250.34
Nebraska Energy	Aurora	59052	008424	234.80
NNSWC Landfill	Clarkson	62779	008811	91.72
Northern Natural Gas Co	Beatrice	23382	008324	2,730.78
NPPD Beatrice Power Station	Beatrice	76739	009002	1,169.26
NPPD Canaday Station	Lexington	8512	008433	2,118.21
NPPD Gerald Gentleman Station	Sutherland	34385	008396	31,227.88
NPPD Hebron Peaking Unit	Hebron	58034	008708	0
NPPD McCook Peaking Unit	McCook	39986	008836	44.02
NPPD Gerald Gentleman Station	Sutherland		000098	664.34
Nucor Corporation	Norfolk	35548	008406	5,637.15
Nucor Steel	Norfolk	35677	008267	7,268.19
OPPD Cass County Station	Plattsmouth	70919	008870	1,249.24
OPPD Nebraska City Station	Nebraska City	58343	008355	44,888.31
OPPD Sarpy County Station	Bellevue	42638	008241	945.53
Pacific Ethanol Aurora West	Aurora	87072	010151	10,597.44
Papillion CRK-WWTP	Omaha	57789	008436	4,404.93
PGLA-1	Blair	64258	008451	1,970.80

Facility Name	Facility Location	Facility ID	Time Tracking Code	Total Agency Costs
Pioneer Trails Tank Car		86000	001955	70.55
Plainview Municipal Power Plant	Plainview	38561	008757	74.78
Platte Generating Station	Grand Island	58027	008771	400.19
Premier Ind.	Mead	43396	008221	107.45
Sarpy County Sanitary Landfill	Springfield	48856	008828	67.72
Siouxland Ethanol	Jackson	85434	007303	6260.57
TIGT Big Springs Station	Big Springs	56628	008297	3,726.77
Tyson Fresh Meats, Inc	Dakota City	7339	008376	627.62
Union Pacific Railroad	North Platte	60192	008481	897.77
Valero Renewable Fuels Co	Albion	85814	009089	17,599.88
Vulcraft/Nucor	Norfolk	35548	008406	148.26
Western Sugar Cooperative	Scottsbluff	44141	008225	17,902.35
Williams Power & Light	Irvington	17738	008462	85.82

D. Sector-Specific Costs

Chart 1 illustrates the program costs by industry sector. The heavy manufacturing sector includes manufacturing facilities such as Nucor Steel, Omaha Steel Castings, and Valmont Industries. The food and meat processing sector includes bread manufacturing, meat packing, rendering, and pet food manufacturing. Incineration includes hospital waste incinerators, as well as the Clean Harbors facility in Kimball. Wastewater treatment facilities (WWTFs) include those systems at municipalities. The "non-source specific" category refers to costs associated with activities that are not related to an individual source, but benefit a broad category of sources. Examples of "non-source specific" activities include, but are not limited to: ambient monitoring, rule development, process improvement activities, data entry, outreach, training, and operating expenses. The program costs reflected in Chart 1 include those attributed to activities related to Class I major sources and Class II synthetic minor sources.

Chart 1: Title V Costs by Sector (Percentage)