

Permit Program Implementation

Estimated Costs, Proposed Fee Structure and Examples, and Program
Implementation

October 25, 2024 - SWAP Meeting

NPDES and State Permit Program Costs

- ▶ Program Planning, Management, and Oversight
- ▶ Guidance Development, Review, and Implementation
- ▶ Training
- ▶ Administration of Fee Program
- ▶ Permitting
 - ▶ Individual
 - ▶ General
 - ▶ Extraordinary Permits
- ▶ Public Participation
 - ▶ Outreach
- ▶ Data Management
- ▶ Permit Appeals
- ▶ Compliance Assistance

| Permit Type | NPDES Program | State Program |
|-------------|---------------|---------------|
| POTWs | 60 | 8 |
| Industrial | 35 | 5 |
| CGP | 3,200 | 310 |
| MSGP | 500 | 40 |
| MS4 | 35 | 0 |
| CAFO | 20 | 0 |
| Other | 50 | 15 |

Approximate Values

FTE: 16.7 (~\$2.2M)

NPDES and State Permit Program Costs

| Activity - Administrative | LOE (hrs) | FTE | Cost |
|---|-----------|-----|---------|
| Program planning, management and oversight | 6,600 | 3.7 | \$535k |
| Rule and guidance development, review, and revision | 3,520 | 2.0 | \$318k |
| Administration of fee program | 3,960 | 2.2 | \$321k |
| Estimated Total Permit Admin | 14,080 | 7.8 | \$1.17M |

| Activity - Technical | LOE (hrs) | FTE | Cost |
|--|-----------|-----|-----------|
| Permit Issuance - Individual Permits | 7,560 | 4.2 | \$483,741 |
| Permit Issuance - General Permits | 5,400 | 3.0 | \$345,510 |
| Permit Issuance - General Permit Authorization | 2,872 | 1.6 | \$183,760 |
| Permit Appeals | 199 | 0.1 | \$12,696 |
| Estimated Total Permit Technical | 16,031 | 8.9 | \$1.03M |

Total LOE: 30,111 hours
Total Cost: \$2.2M

NPDES and State Compliance Program Costs

- ▶ Program Planning, Management, and Oversight
- ▶ Guidance Development, Review, and Implementation
- ▶ Training
- ▶ Review of Discharge Monitoring Reports
- ▶ Routine Compliance Inspections (Majors: 1/2 years/Minors: 1/5 years)
 - ▶ Reconnaissance Inspections
 - ▶ Comprehensive Inspections
 - ▶ Pretreatment Performance Compliance Inspections/Audits
 - ▶ Sanitary Sewer Overflows
 - ▶ MS4 Inspections
 - ▶ CAFO Inspections
 - ▶ Stormwater Inspections (MSGP/CGP)
 - ▶ Diagnostic Inspections
- ▶ Compliance Assistance
- ▶ Data Management

FTE: ~14.1 (~\$1.7M)

NPDES and State Compliance Program Costs

| Activity - Technical | LOE (hrs) | FTE | Cost |
|---|-----------|------|-----------|
| DMR Reviews | 4,210 | 2.3 | \$269,369 |
| Reconnaissance Inspections - Individual Permits | 70 | 0.04 | \$5,978 |
| Comprehensive Inspections - Individual Permits | 700 | 0.4 | \$46,321 |
| Pretreatment Inspections/Audits | 371 | 0.2 | \$23,709 |
| Diagnostic Inspections | 520 | 0.3 | \$33,271 |
| General Permit Inspections (Recon and Comp) | 11,753 | 6.5 | \$770,340 |
| Compliance Assistance | 7,866 | 4.4 | \$503,316 |
| Estimated Total Compliance Cost | 25,490 | 14.1 | \$1.7M |

NPDES and State Enforcement Program Costs

- ▶ Program Planning, Management, and Oversight
- ▶ Guidance Development, Review, and Implementation
- ▶ Training
- ▶ Complaint Investigation
- ▶ Non-Permitted Facilities
- ▶ Emergency Response
- ▶ Monitoring
- ▶ Data Management
- ▶ Violation Response
 - ▶ Initial and follow-up activities
- ▶ Administrative Orders
- ▶ Appeals/Hearings
- ▶ Civil/Criminal Referral and Post-referral Follow-up

FTE: 17.1 (~\$2.0M)

NPDES and State Enforcement Program Costs

| Activity - Technical | LOE (hrs) | FTE | Cost |
|---|-----------|------|-------------|
| Complaint Investigation - Individual Permits | 150 | 0.1 | \$9,597 |
| Complaint Investigation - General Permits | 5,723 | 3.2 | \$366,189 |
| Complaint Investigation - Emergency Response | 1,165 | 0.6 | \$74,516 |
| Complaint Investigation - Non-permitted | 17,419 | 9.7 | \$1,114,538 |
| Violation Response - Initial and Follow Up - Individual | 331 | 0.2 | \$21,191 |
| Violation Response - Initial and Follow Up - General | 2,780 | 1.5 | \$177,914 |
| Administrative Orders | 2,593 | 1.4 | \$165,921 |
| Civil/Criminal Referral | 778 | 0.4 | \$49,762 |
| Total Enforcement Technical | 30,939 | 17.1 | \$1.98M |

State “404ish” Program Costs

- ▶ Planning and Coordination for Wetlands Program
 - ▶ Program Development and Evaluation
 - ▶ Development of any Assessment/Management Techniques Necessary
 - ▶ Intra-agency and Interagency Coordination
- ▶ Permitting - Individual
- ▶ State Programmatic General Permit Program
- ▶ Surveillance and Enforcement of Permit Compliance
- ▶ Administrative and Legal Appeals
- ▶ Public Education and Outreach
- ▶ Staff Training

NPDES and State “404ish” Program Costs

| Activity | LOE (hrs) | FTE | Cost |
|---|-----------|-----|-------------|
| Planning and Coordination | 3,600 | 2.0 | \$230,340 |
| Permitting - Individual | 1,000 | 0.6 | \$63,983 |
| Permitting - SPGP | 4,730 | 2.6 | \$302,641 |
| Surveillance and Enforcement of Permit Compliance | 2,727 | 1.6 | \$174,455 |
| Administrative and Legal Appeals | 2,700 | 1.5 | \$172,755 |
| Public Education and Outreach | 738 | 0.4 | \$47,209 |
| Staff Training | 720 | 0.4 | \$46,068 |
| Total 404ish Administrative | 3,600 | 2.0 | \$230,340 |
| Total 404ish Technical | 12,191 | 6.9 | \$780,010 |
| Total 404ish | 15,791 | 9.1 | \$1,037,451 |

NPDES and State Program: Total Costs

| Program | Estimated FTE | Estimated Cost (\$ Million) |
|---------------------|---------------|--------------------------------|
| Permitting | 16.7 | 2.2 |
| Compliance | 14.1 | 1.7 |
| Enforcement | 17.1 | 2.0 |
| 404ish | 9.1 | 1.0 |
| Other Related Costs | NA | ~0.9 |
| Total: | ~57 | ~7.8 |

Approximate Values

Proposed Permitting Fees

► Considerations:

- Fully Fund Programs?
- Partially Fund Program Through State General Fund?
- Equitability/Reasonableness
- Type of Facility
- Flow Volume/Design Flow
- Number of Outfalls
- Permit Type
 - Individual
 - General
 - Major
 - Minor
 - Complexity
- Application Fee vs Annual Fee
- Service Related Fees (e.g., Special Study Reviews)

| Permit Type | NPDES Program | State Program |
|-------------|---------------|---------------|
| POTWs | 60 | 8 |
| Industrial | 35 | 5 |
| CGP | 3,200 | 310 |
| MSGP | 500 | 40 |
| MS4 | 35 | 0 |
| CAFO | 20 | 0 |
| Other | 50 | 15 |

Approximate Values

Proposed Permitting Fees

► Application Fee vs Annual Fees

- Application Fee: One-time fee when application is submitted
 - Permit development and outreach
- Annual Fee: Reoccurring annual fee for each year the permit is active and held by a permittee
 - Compliance/enforcement and outreach
- States that rely on application fees may face inconsistent annual funding
- States that rely on annual fees tend to have more consistent funding
- Combined approach can address permit-specific level of effort, and provide consistent funds for on-going programmatic maintenance

Proposed Permitting Fees

Arizona Annual Fees

| Permit Type | Annual Fee | Annual Registration Fee if Facility is Not Yet Constructed |
|---|---|---|
| Municipal separate storm sewer system | \$14,670 | N/A |
| Wastewater treatment plant (based on gallons of discharge per day): | | |
| Less than 99,999 | | \$370 |
| 100,000 to 999,999 | \$370 | \$730 |
| 1,000,000 to 9,999,999 | \$730 | \$920 |
| 10,000,000 or more | \$3,670 | \$1,100 |
| | \$5,870 | |
| Facility or activity that is not a wastewater treatment plant or municipal separate storm sewer and designated in the permit as either: | | |
| Major | \$3,670 | |
| Minor | \$730 | \$920 |
| | | \$730 |
| Pretreatment program | \$4,400 | N/A |
| Consolidated individual permit for multiple AZPDES individual permits, as allowed under A.A.C. R18-9-B901(C) | Aggregate of the applicable annual fees of each individual permit | Aggregate of the applicable annual fees of each individual permit |

Arizona Permitting Fees

| Permit Type | Maximum Fee |
|---|--|
| Individual permit for municipal separate storm sewer system | \$58,670 |
| Individual permit for wastewater treatment plant (based on gallons of discharge per day) | |
| 3,000 to 99,999 | \$22,000 |
| 100,000 to 999,999 | \$29,340 |
| 1,000,000 to 9,999,999 | \$44,000 |
| 10,000,000 or more | \$73,340 |
| Individual permit for a facility or activity that is not a wastewater treatment plant or a municipal separate storm sewer | \$44,000 |
| Amendment to an individual permit | \$18,330 |
| Approval of a new or revised pretreatment program under AZPDES | \$14,670 |
| Consolidated individual permit for multiple AZPDES individual permits, as allowed under A.A.C. R18-9-B901(C) | Aggregate of the applicable maximum fees |

\$180/hr, maximums provided above

Proposed Permitting Fees

Arizona General Permitting Fees

| Category | Factors for Establishing Fees | Initial Fee and Annual Fees |
|--|---|--|
| Municipal Separate Storm Sewer System General Permit | <p>The fee is based on the population of the permitted area:</p> <p>*Less than or equal to 10,000 *Greater than 10,000 but less than or equal to 100,000 *Greater than 100,000</p> <p>The fee for a non-traditional municipal separate storm sewer system, such as a hospital, college, or military facility</p> | <p>\$3,670 \$7,330 \$11,000</p> <p>\$7,330</p> |
| Construction General Permit | <p>The fee is based on the amount of acreage identified in the Notice of Intent:</p> <p>*Less than or equal to 1 acre *Greater than 1 acre but less than or equal to 50 acres *Greater than 50 acres Erosivity Waiver Pollution prevention plan review Each additional submittal due to deficiency</p> <p>If more than one person must apply for general permit coverage of the same facility or discharge activity, each person pays:</p> | <p>\$370 \$510 \$730 \$1,100 \$1,470, no annual fee \$730, no annual fee</p> <p>Fee applicable to the amount of acreage each person controls</p> |
| Multi-Sector General Permit | <p>The fee is based on the amount of acreage identified in the Notice of Intent:</p> <p>*Less than or equal to 1 acre *Greater than 1 acre but less than or equal to 40 acres *Greater than 40 acres</p> <p>Pollution prevention plan review *Each additional submittal due to deficiency</p> <p>Certificate of No Exposure</p> <p>If more than one person must apply for a general permit coverage of the same facility or discharge activity, each person pays:</p> | <p>\$510 \$730 \$1,470</p> <p>\$1,470 no annual fee \$730, no annual fee</p> <p>\$1,830, no annual fee</p> <p>Fee applicable to the amount of acreage each person controls</p> |
| De Minimis General Permit | <p>*Notice of Intent for Single Source *Notice of Intent for Areawide/Project-Wide/Facility-Wide *Review of a Best Management Practices Plan (BMPP) *Each additional submittal due to deficiency</p> | <p>\$370 \$730 \$1,470, no annual fee \$730, no annual fee</p> |
| Pesticide General Permit | <p>*Single Source Permit *Areawide Permit *Pesticide Discharge Management Plan Review *Each additional submittal due to deficiency</p> | <p>\$370 \$730 \$1,470 \$730, no annual fee</p> |

Proposed Permitting Fees

Virginia Permitting Fees

| | |
|---|----------|
| VPDES Industrial Major | \$24,000 |
| VPDES Municipal Major | \$21,300 |
| VPDES Industrial Minor/No Standard Limits | \$10,200 |
| VPDES Industrial Minor/Standard Limits | \$3,300 |
| VPDES Industrial Stormwater | \$7,200 |
| VPDES Municipal Minor/Greater Than 100,000 GPD | \$7,500 |
| VPDES Municipal Minor/10,001 GPD-100,000 GPD | \$6,000 |
| VPDES Municipal Minor/1,001 GPD-10,000 GPD | \$5,400 |
| VPDES Municipal Minor/1,000 GPD or less | \$2,000 |
| VPDES Municipal - The authorization for land application, distribution, or marketing of biosolids or land disposal of sewage sludge | \$5,000 |

Virginia Annual Fees

| | |
|--|---------|
| VPDES Industrial Major | \$7,876 |
| VPDES Municipal Major/Greater Than 10 MGD | \$7,794 |
| VPDES Municipal Major/2 MGD - 10 MGD | \$7,138 |
| VPDES Municipal Major/Less Than 2 MGD | \$6,317 |
| VPDES Industrial Minor/No Standard Limits | \$3,347 |
| VPDES Industrial Minor/Standard Limits | \$1,969 |
| VPDES Industrial Minor/Water Treatment System | \$1,969 |
| VPDES Industrial Stormwater | \$2,363 |
| VPDES Municipal Minor/Greater Than 100,000 GPD | \$2,461 |
| VPDES Municipal Minor/10,001 GPD - 100,000 GPD | \$1,969 |
| VPDES Municipal Minor/1,001 GPD - 10,000 GPD | \$1,772 |
| VPDES Municipal Minor/1,000 GPD or Less | \$656 |

Proposed Permitting Fees

California Annual California Permitting Fees

ANNUAL FEE SCHEDULE FOR AREAWIDE MUNICIPAL STORM WATER SEWER SYSTEM PERMITS AND CO-PERMITTEES

| Population | Fee |
|----------------------------------|-----------|
| Equal to or greater than 250,000 | \$70,667 |
| 200,000 to 249,999 | \$61,833 |
| 150,000 to 199,999 | \$53,352 |
| 100,000 to 149,999 | \$44,169 |
| 75,000 to 99,999 | \$35,333 |
| 50,000 to 74,999 | \$26,498 |
| 25,000 to 49,999 | \$17,666 |
| 10,000 to 24,999 | \$10,602 |
| 1,000 to 9,999 | \$7,067 |
| Less than 1,000 population | \$3,535 |
| Statewide Permit Holders | \$282,664 |
| High Speed Rail Authority | \$165,739 |

| Acres | Annual Fee |
|-----------|------------|
| >0 to <1 | \$1,651 |
| 1 to <5 | \$1,673 |
| 5 or more | \$1,818 |

POTW Annual Fee:

Fee = \$3,576 + (6,323 x Flow (MGD))

Maximum Fee of \$894,107

Additional \$10k for pretreatment program

Proposed Permitting Fees

Nevada Permitting Fees

| Type | Application Fee | Annual Fee |
|---|---|---|
| Domestic Wastewater | <ul style="list-style-type: none">• <50,000 gallons: \$1,000• 50k-250k: \$1,500• 250k-500k: \$2,000• 500k-1M: \$3,000• 1M-2M: \$4,000• 2M-5M: \$6,000• 5M-10M: \$10,000• 10M-20M: \$10,000• 20M-40M: \$10,000• 40M+: \$10,000 | <ul style="list-style-type: none">• <50,000 gallons: \$1,406• 50k-250k: \$2,109• 250k-500k: \$2,812• 500k-1M: \$4,219• 1M-2M: \$5,626• 2M-5M: \$8,438• 5M-10M: \$14,066• 10M-20M: \$28,132• 20M-40M: \$42,198• 40M+: \$56,263 |
| Other Discharges (not including CAFOs and other categories) | <ul style="list-style-type: none">• <50,000 gallons: \$1,000• 50k-250k: \$1,500• 250k-500k: \$3,000• 500k-1M: \$5,000• 1M-10M: \$10,000• 10M-35M: \$10,000• 35M+: \$10,000 | <ul style="list-style-type: none">• <50,000 gallons: \$1,406• 50k-250k: \$2,109• 250k-500k: \$4,219• 500k-1M: \$7,302• 1M-10M: \$14,066• 10M-35M: \$28,132• 35M+: \$42,198 |

Proposed Permitting Fees

Nevada General Permitting Fees

| Type | Application Fee | Annual Fee |
|-----------|--|--|
| CGP | <ul style="list-style-type: none">• <10 acres: \$300• 10-49 acres: \$400• 50-99 acres: \$750• 100-499 acres: \$1,000• 500+ acres: \$1,250 | <ul style="list-style-type: none">• <10 acres: \$200• 10-49 acres: \$200• 50-99 acres: \$400• 100-499 acres: \$400• 500+ acres: \$400 |
| MSGP | \$1,500 | \$1,000 |
| Mining SW | \$1,500 | \$1,000 |
| Other | \$300 | \$300 |

Proposed Permitting Fees

- ▶ Overview of a few fee structures
 - ▶ State and NPDES program to have same fees
 - ▶ General Permits are $\sim 1/2$ of the permit program costs
 - ▶ Of the $\sim 1/2$ remaining costs attributable to individual permits:
 - ▶ POTWs make up $\sim 2/3$ of the individual permits
 - ▶ Industrials make up $\sim 1/3$ of the individual permits
- ▶ Individual Permits ($\sim \$32\text{k}/\text{facility}$ annually)

Proposed Permitting Fees

- ▶ Overview of a few fee structures
 - ▶ State and NPDES program to have same fees
 - ▶ NPDES and State must fund up to \$6.8M in operational costs
 - ▶ General Permits provide ~49% of the necessary funding
 - ▶ ~\$3.4M
 - ▶ Major/Minor facilities need to make up the remaining funds
 - ▶ ~\$3.6M
- ▶ Individual Permits (~\$32k/facility annually)

Proposed Permitting Fees

- ▶ Equitable Fees based on Major/Minor and design flow
- ▶ POTW Fees: Formula
 - ▶ Design Flow
 - ▶ Tax Bracket Approach
 - ▶ Pretreatment Program
- ▶ Additional Fees:
 - ▶ Study Reviews
 - ▶ Dilution Modeling
 - ▶ Permit Mods
 - ▶ Follow-up Inspection

| Percentile | Application Fees | Annual Fees |
|-------------------|------------------|-------------|
| 10 th | \$2,371 | \$3,577 |
| 25 th | \$3,060 | \$6,505 |
| 50 th | \$7,060 | \$23,505 |
| 75 th | \$16,660 | \$54,555 |
| 90 th | \$29,500 | \$109,125 |
| 100 th | \$46,010 | \$179,293 |

Approximate Values

Proposed Permitting Fees

► POTW Application Fee

► Base Fee x Flow Factor

► Base fee:

► Minor: \$2,000

► Major: \$5,000

► Example: Major POTW with design flow of 5.5 MGD

$$\begin{aligned} \text{Fee} &= \$5,000 + (500\text{k} \times 0.003000) \\ &+ \$21,160 = \$27,660 \end{aligned}$$

| Flow (gallons) | Cost/Gallon | Cap |
|----------------|-------------|--------|
| 10,000 | 0.012500 | 125 |
| 25,000 | 0.011500 | 297.5 |
| 50,000 | 0.010500 | 560 |
| 100,000 | 0.010000 | 1,060 |
| 250,000 | 0.009000 | 2,410 |
| 500,000 | 0.008000 | 4,410 |
| 1,000,000 | 0.006500 | 7,660 |
| 2,500,000 | 0.004000 | 13,660 |
| 5,000,000 | 0.003000 | 21,160 |
| 7,500,000 | 0.002500 | 27,410 |
| 10,000,000 | 0.001000 | 29,910 |
| 20,000,000 | 0.000500 | 32,410 |
| 30,000,000 | 0.000250 | 33,660 |
| 40,000,000 | 0.000200 | 35,660 |
| 50,000,000 | 0.000150 | 37,160 |
| >50,000,000 | 0.000125 | 38,410 |

Proposed Permitting Fees

► POTW Annual Fee

► Base Fee x [Flow Factor x 4.25]

► Base fee:

► Minor: \$2,000

► Major: \$5,000

► Example: Major POTW with design flow of 5.5 MGD

► $\text{Fee} = \$5,000 + [(500\text{k} \times 0.003000) + \$21,160] \times 4.25 = \$101,305$

| Flow (gallons) | Cost/Gallon | Cap |
|----------------|-------------|--------|
| 10,000 | 0.012500 | 125 |
| 25,000 | 0.011500 | 297.5 |
| 50,000 | 0.010500 | 560 |
| 100,000 | 0.010000 | 1,060 |
| 250,000 | 0.009000 | 2,410 |
| 500,000 | 0.008000 | 4,410 |
| 1,000,000 | 0.006500 | 7,660 |
| 2,500,000 | 0.004000 | 13,660 |
| 5,000,000 | 0.003000 | 21,160 |
| 7,500,000 | 0.002500 | 27,410 |
| 10,000,000 | 0.001000 | 29,910 |
| 20,000,000 | 0.000500 | 32,410 |
| 30,000,000 | 0.000250 | 33,660 |
| 40,000,000 | 0.000200 | 35,660 |
| 50,000,000 | 0.000150 | 37,160 |
| >50,000,000 | 0.000125 | 38,410 |

Proposed Permitting Fees

- ▶ Equitable Fees based on Major/Minor
- ▶ POTW Fees: Formula
 - ▶ Design Flow
 - ▶ Tax Bracket Approach
 - ▶ Pretreatment Program

- ▶ Additional Fees:

- ▶ Study Reviews
- ▶ Dilution Modeling
- ▶ Permit Mods
- ▶ Follow-up Inspection

| Percentile | Application Fees | Annual Fees |
|-------------------|------------------|-------------|
| 10 th | \$2,500 | \$3,577 |
| 25 th | \$2,500 | \$6,505 |
| 50 th | \$5,750 | \$23,505 |
| 75 th | \$36,250 | \$54,555 |
| 90 th | \$104,688 | \$109,125 |
| 100 th | \$209,375 | \$179,293 |

Approximate Values

Proposed Permitting Fees

► Industrial Application Fee

► Can't base on flow

► Considerations that impact LOE

► Complexity

► Power Plants

► Mines

► Refineries

► Very large facilities with multiple wastewaters

► Application of effluent limitation guidelines

► Number of outfalls

► Major/Minor

| Percentile | Application Fees | Annual Fees |
|-------------------|------------------|-------------|
| 10 th | \$2,500 | \$5,000 |
| 25 th | \$2,500 | \$5,000 |
| 50 th | \$5,750 | \$5,000 |
| 75 th | \$37,187 | \$27,500 |
| 90 th | \$104,688 | \$65,000 |
| 100 th | \$209,375 | \$65,000 |

Proposed Permitting Fees

▶ Industrial Application Fee

▶ Complexity Factor x Base Fee

▶ Additional Outfalls (max of 25) x Base Fee x 1.3 x Complexity Factor

▶ Base fee:

▶ Minor: \$2,500

▶ Major: \$7,500

▶ Complexity Factor based on experience

▶ Example:

▶ Simple 1 outfall major

▶ $\$7,500 \times \text{Complexity Factor (1.00)} = \$7,500$

Proposed Permitting Fees

▶ Industrial Application Fee

▶ Complexity Factor x Base Fee

▶ Additional Outfalls (max of 25) x Base Fee x 1.3 x Complexity Factor

▶ Base fee:

▶ Minor: \$2,500

▶ Major: \$7,500

▶ Example:

▶ Simple 2 outfall major

▶ $\$7,500 \times \text{Complexity Factor (1.00)} = \$7,500$

▶ $1 \text{ additional outfall} \times \$7,500 \times 1.3 \times 1.00 = \$9,750$

▶ Total: \$17,250

Proposed Permitting Fees

▶ Industrial Application Fee

▶ Complexity Factor x Base Fee

▶ Additional Outfalls (max of 25) x Base Fee x 1.3 x Complexity Factor

▶ Base fee:

▶ Minor: \$2,500

▶ Major: \$7,500

▶ Example:

▶ Complex 2 outfall minor

▶ $\$2,500 \times \text{Complexity Factor (2.50)} = \$6,250$

▶ $1 \text{ additional outfall} \times \$2,500 \times 1.3 \times 2.50 = \$8,125$

▶ Total: \$14,375

Proposed Permitting Fees

▶ Industrial Annual Fee

- ▶ Base Fee + (Number of outfalls x Base Fee)

- ▶ Max of 25 outfalls

- ▶ Base fee:

- ▶ Minor: \$2,500

- ▶ Major: \$7,500

▶ Example:

- ▶ 2 outfall minor

- ▶ $\$2,500 + (\text{number of outfalls} \times \$2,500) = \$7,500$

Proposed Permitting Fees - General Permits

Fees may be broken out further based on complexity, flow, acreage, etc.

| Permit Type | Facilities | Application Fee | Annual Fee |
|------------------|------------|-----------------|------------|
| NPDES MSGP | 512 | \$725 | \$600 |
| State MSGP | 50 | \$725 | \$600 |
| NPDES CGP | 3,172 | \$725 | \$725 |
| State Waters CGP | 300 | \$725 | \$725 |
| MS4 | 35 | \$2,500 | \$2,500 |
| Hydrostatic | 10 | \$500 | \$450 |
| Aquaculture | 6 | \$500 | \$450 |
| Pesticides | 25 | \$500 | \$250 |
| Wildfire | 10 | \$500 | \$250 |
| CAFO | 21 | \$1,500 | \$1,250 |