

2013 Survey of Surrounding States' Construction Permitting Fees

State Construction Permit Fees

Iowa Project Definition	Project Type	Wisconsin	Illinois	Minnesota	Nebraska	South Dakota	Missouri	Kansas	Project Cost		Permit Cost	
									Average	Average (Not incl. WI or SD)	Average Per Permit	Average (Not incl. WI or SD)
Standard	#1: A minor Greenfield facility with three emission points.	\$5,400	\$1,500	\$570	\$250	\$125	\$100 + \$50/hour (most below \$1,000)	\$100 + .05% of capital cost	\$1,569	\$773	\$523	\$258
Complex	#2: An existing minor facility with three emission points with limits on three pollutants to stay synthetic minor.	\$12,500	\$5,000	\$9,690	\$1,500	\$125	\$100 + \$50/hour (most below \$2,000)	\$100 + .05% of capital cost	\$5,763	\$5,397	\$1,921	\$1,799
Complex	#3: A minor Greenfield facility with 3 emission points involving a NSPS determination and NESHAP determination.	\$16,500	\$1,500	\$14,250	\$1,500	\$125	\$100 + \$50/hour (most below \$2,000)	\$100 + .05% of capital cost	\$6,775	\$5,750	\$2,258	\$1,917
PSD	#4: An existing PSD facility with a PSD major modification for three pollutants involving three emission points with NSP and NESHAP determination.	\$103,000	\$22,000	\$19,950	\$3,000	\$125	\$100 + \$50/hour (\$20,000 - \$40,000)	\$4,000 (maximum fee)	\$29,615	\$14,983	\$9,872	\$4,994
PSD	#5: New EGU	\$103,000	\$67,000	\$29,925	\$3,000	\$125	\$100 + \$50/hour (\$100,000+ based on recent permitting)	\$4,000 (maximum fee)	\$40,610	\$33,308		

Note: Missouri and Kansas were not included in averages due to the form of their fee structures.

Construction Permit Fee Alternatives for Iowa

2013 Draft for Discussion Only

In Iowa, the cost of reviewing applications, and drafting and issuing Air Quality Construction Permits, is covered by Title V Emission Fees (for Major Sources), or by Federal Clean Air Grant funds matched by Iowa General Funds (for Minor Sources). Iowa is the only state in the region surrounding Iowa that does not levy a separate air construction permit fee to support all or part of the Construction Permit issuance activities. The following table provides some alternative approaches to establishing a “Fee for service” to more equitably allocate the cost of this state service to those who are applying for and receiving Construction Permits from the Iowa Air Quality Bureau.

Alternatives:	Permit Number Basis	States Average		States Average not Including WI or SD		Iowa 1		Iowa 2	
		Average Number of Permits Issued	States Average Calculated Cost	States Average Per Permit Costs	States Average (WI, SD) Calculated Cost	States Average (WI, SD) Per Permit Costs	2014 Permit Issuance Cost ¹	2014 Permit Issuance Cost - Per Permit Cost ¹	2014 Permit Program Cost ²
Major Sources									
Standard Major	443	\$231,432	\$523	\$114,069	\$258	\$620,800	\$1,400	\$1,218,320	\$2,750
Complex ³	96	\$200,784	\$2,090	\$178,503	\$1,858	\$539,190	\$5,610	\$1,056,930	\$11,000
PSD	76	\$747,691	\$9,872	\$378,285	\$4,994	\$531,200	\$7,010	\$1,618,900	\$21,370
Total	614	\$1,179,907		\$670,857		\$1,691,400		\$3,895,800	
(rounding)						-\$210		-\$1,650	

“States Average” and “States Average not including WI or SD” Complex permit costs were derived by averaging results of the Project Types #2 and #3 on the State Construction Permitting Fee Survey sheet.

¹ Permit Issuance Cost: Only the permitting and dispersion modeling staff costs associated with that program area.

² Permit Program Cost: The cost of all supporting activities for that program area.

³ Complex permits are estimated at 4 times the cost of Standard Permits based on State Fee Average Data. Projects that are listed as complex include: State Implementation Plan (NAAQS exceedance or violation), Large new facilities requiring extensive “synthetic minor” permitting, PSD Netting projects, large projects to resolve violations, etc.