

**Air Quality Permit Program  
Emission Fee  
Appropriations Report**

**Presented to  
Appropriations Committee  
of the  
Legislature**

**By the  
Department of Environmental Quality**



**December 11, 2018**

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## Introduction

The Department of Environmental Quality 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 2018 (SFY 2018) 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 NDEQ 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<sub>3</sub>), lead (Pb), particulate matter (PM), carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), and sulfur dioxide (SO<sub>2</sub>); Nebraska is currently in attainment (compliance) with all six standards. Pending actions affecting Nebraska include:

#### 2016 Lead NAAQS

EPA issued lead standards in October 2016, retaining the level of the previous primary and secondary standard of 15 micrograms per square meter (3-month rolling average) issued in 2008. NDEQ's designation recommendation of attainment for Nebraska was submitted to EPA in October 2017. Nebraska's updated State Implementation Plan is due to EPA in October 2019.

### 2015 Ozone NAAQS

EPA issued revised ozone standards in 2015, lowering the standard from 0.075 parts per million (ppm) to 0.070 ppm. In September 2016 NDEQ submitted its designation recommendation to EPA, which designated the entire state as “unclassifiable/attainment” with respect to the 2015 ground-level ozone standard. The revised State Implementation Plan for ozone was submitted to EPA in September 2018.

### 2010 SO<sub>2</sub> NAAQS

The 2010 sulfur dioxide (SO<sub>2</sub>) standard requires that states demonstrate attainment in the areas surrounding large sources of this pollutant. NDEQ 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 early 2016; the third (Sheldon Station in Lancaster County) was designated unclassifiable, and required further characterization.

To supplement the 2010 SO<sub>2</sub> standard, the 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<sub>2</sub> by the use of air quality monitoring or pollutant dispersion modeling. Another option for air quality agencies was to adopt enforceable SO<sub>2</sub> emission limits not to exceed 2,000 tons per year for the affected sources. Sources in the state subject to this rule were 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 was designated as “attainment/unclassifiable” by EPA on April 9, 2018. Air quality monitors were installed in 2016 near Sheldon Station and North Omaha Station and began operation in January 2017. Monitoring will continue through 2020 and a designation recommendation for these areas will be submitted to EPA in early 2021.

The DRR requires annual reporting (termed “ongoing requirements”) on areas that were characterized by modeling, and this year’s report was submitted in June 2018. The three facilities subject to these ongoing requirements include Whelan Energy Center, Gerald Gentleman Station, and Nebraska City Station. Emissions data from these facilities were evaluated in June 2018 and indicated that all areas continue to demonstrate attainment with the federal standard.

As the NAAQS are continually subject to being lowered by EPA for PM<sub>2.5</sub>, lead, NO<sub>2</sub>, SO<sub>2</sub>, and ozone, maintaining the state’s attainment status may prove to be a challenge. 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, the EPA issued the Cross-State Air Pollution Rule (CSAPR) in 2011. This rule addresses the ozone standards and PM<sub>2.5</sub> issues; EPA determined that Nebraska had an impact on Wisconsin and its ability to maintain compliance with the 24-hour PM<sub>2.5</sub> standard. After court challenges to the rule, in which Nebraska was a petitioner, the rule was upheld by the United States Supreme Court in April 2014, and implementation began in 2015, requiring electric generating facilities in Nebraska to comply with the sulfur dioxide and nitrogen dioxide emission caps. The second phase of this rule was

implemented in September 2016 when the EPA issued a final CSAPR rule to address the 2008 ozone NAAQS; EPA determined that Nebraska had no impact on downwind states and further emission reductions were not required.

## ***B. Greenhouse Gas Permitting***

As a result of a U.S. Supreme Court decision in 2007 (*Massachusetts v EPA*), the 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. Clean Power Plan / Affordable Clean Energy***

The Clean Power Plan, which was issued by EPA in 2015, would have regulated greenhouse gas emissions from fossil-fuel power plants. Nebraska was among 24 states to join a lawsuit against the Clean Power Plan in 2015, and this court action culminated in February 2016 when the plan was stayed by the U.S. Supreme Court. This action cancelled the September 2016 deadline for states' initial submittals under the Plan. The Department halted work on the planning process following the stay in 2016, and the court actions concerning the Clean Power Plan remained in abeyance at the close of SFY2018.

In March 2017 President Trump signed the Executive Order on Energy Independence, which directed EPA to review the Clean Power Plan and revise or repeal the plan if EPA determined that it causes unnecessary, costly burdens on coal-fired electric utilities, coal miners, and oil and gas producers. In December 2017 EPA issued an Advance Notice of Proposed Rulemaking, soliciting information from the public about potential future rulemaking to limit greenhouse gas emissions from power plants. In August 2018 EPA proposed the Affordable Clean Energy (ACE) Rule as a replacement for the Clean Power Plan. This rule would establish emission guidelines for states to use when developing plans to limit greenhouse gas emissions at power plants. NDEQ will begin planning for implementation of the ACE Rule after the final rule is issued.

## ***D. Regional Haze***

The Regional Haze Rule was implemented in 1999 to improve visibility in national parks and wilderness areas, and directs state and federal agencies to work together to achieve this goal. Numerous amendments to the Rule have been issued, most recently addressing Best Available Retrofit Technology (BART) determinations for particular pollutant sources.

NDEQ submitted its first Regional Haze State Implementation Plan (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 SO<sub>2</sub> BART determination for Gerald Gentleman Station and the state's long-term strategy for regional haze insofar as its reliance on the BART determination.

A Federal Implementation Plan (FIP) was issued by EPA that relied on the Cross State Air Pollution Rule (CSAPR) to address reasonable progress toward regional haze goals. This rule established a trading program which allots an SO<sub>2</sub> emission budget for participating sources, which includes Gerald Gentleman Station. Emissions to date from this source have been below the allotted SO<sub>2</sub> budget under CSAPR, and no additional control measures have been required.

Nebraska filed a petition for review of the partial disapproval of the SIP, and was denied by the 8<sup>th</sup> Circuit Court of Appeals in February 2016. In this litigation, EPA requested and the Court granted a voluntary remand of the FIP related to EPA's reliance on CSAPR to satisfy the long-term strategy requirements for Gerald Gentleman Station for SO<sub>2</sub>.

The Department submitted the Regional Haze Five-year Progress Report in April 2017, and provided additional clarification to EPA to demonstrate progress toward visibility goals. At present, the Department is awaiting final approval from EPA, which will effectively finalize Nebraska's obligations under the first implementation period of the Regional Haze Rule, ending in 2018. EPA approval is intended to address the remand on the FIP, and support approval of portions of the 2008 ozone and 2012 PM<sub>2.5</sub> infrastructure SIPs that address interstate transport of pollutants, prevention of significant deterioration of air quality, and protection of visibility.

The second implementation period of the Rule will begin in 2018, and Nebraska's SIP will be due to EPA in July 2021.



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 PM<sub>10</sub>, CO, NO<sub>x</sub>, SO<sub>x</sub>, or VOC; 10 tons or more of any single HAP; 25 tons of any combination of HAPs. Until

the US 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 due to 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 percent 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 – SFY2018

### 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**

<b>Emission Inventory Year</b>	<b>Fee Rate per Ton of Pollutant</b>	<b>Fee Due Date</b>	<b>Fees Collected<sup>1</sup></b>	<b>Fiscal Year Funded</b>
2008	\$62	July 1, 2009	\$2,478,420	SFY2010
2009	\$70	July 1, 2010	\$2,666,552	SFY2011
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

### B. General Discussion of Program Costs

The Department's SFY2018 estimated expenditures (budget) was \$3,094,984 for the Title V program. The Department expended \$2,829,426 or approximately 91% of the budget. Table 2 provides a summary of SFY2018 expenditures within the Title V program by budget category.

**Table 2: Title V Program Costs SFY2018 by Budget Category**

(July 1, 2017 - June 30, 2018)

<b>Category</b>	<b>Agency Program Costs</b>
<b>Personnel</b>	\$ 1,517,982
<b>Benefits</b>	407,915
<b>Contractual</b>	29,373
<b>Supplies</b>	16,904
<b>Other</b>	97,894
<b>Travel</b>	28,369
<b>Equipment</b>	0
<b>Total Direct Costs</b>	2,098,437
<b>Total Indirect Costs</b>	730,989
<b>Total Costs:</b>	<b>\$ 2,829,426</b>

<sup>1</sup> 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

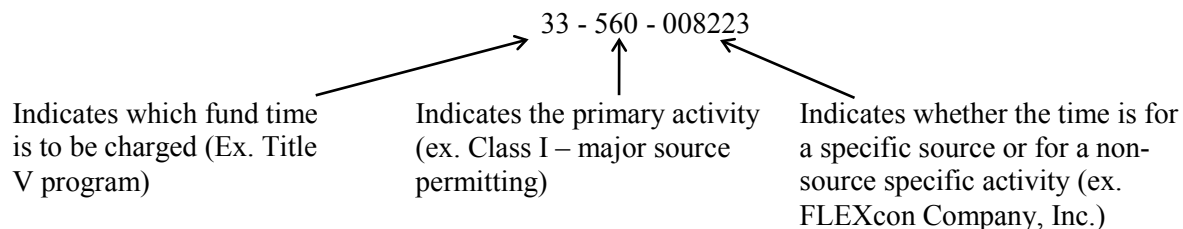
## Primary Activity Costs

### 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<sub>2.5</sub> (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:



**B. Costs by Primary Activity**

The following table details the Title V air program costs for SFY2018 by primary activity:

**Table 3: Costs by Primary Activity SFY2018**  
(July 1, 2017- June 30, 2018)

<b>Time Tracking Code</b>	<b>Primary Activity</b>	<b>Agency Program Costs</b>
001; 607	Administration/Management	\$ 54,473
002	General Office	186,756
100	Outside Meeting	278
103; 567; 592	Compliance	624,840
106	Environmental Data Collection	2,010
112; 564; 604	Rules & Regulations	2,877
114; 606	Training	13,608
553; 594; 605	Air Emission Inventory	38,044
554; 608	Air Ambient Monitoring	40,609
555	SIP (General Air Program)	20,911
559	Small Business Assistance	69,168
560	Air Class I - Title V Permit	76,191
561	Air Class II - Synth Permit	20,697
562	Acid Rain Program	0
564	Air Fed Policy/Rule Making	0
565	Air Toxics	0
566	Other Air Permit	5,142
568	Air - Complaints	5,359
570	Air Low Emitters	6,632
590	Title V – Construction Permit	272,348
591	Title V – Operating Permit	476,237
593; 603	Title V –Modeling	19,640
596	Title V – Monitoring Mercury	1,445
600	Title V/Class II – Compliance Asst/Outreach	1,871
601	Air 105/Title V – Compliance Office Activities	21,742
602	Air 105/Title V – Planning Office	1,237
610	Air 105/Title V – Construction Permit Office	17,594

611	Air 105/Title V – Operating Permit Office	8,979
612	Air 105/Title V – NO FID/Permit	252
No Code	Payroll	433,349
No Code	Benefits & Taxes	116,262
No Code	Operating Expenses	290,844
	<b>TOTAL</b>	<b>\$ 2,829,395</b>

**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 SFY2018**  
(July 1, 2017 - June 30, 2018)

Facility Name	Facility Location	Facility ID	Time Tracking Code	Total Agency Costs
A-1 Fiberglass	Hastings	723	008366	\$ 263
A-1 Fiberglass	Aurora	85312	008917	2,121
ADM Corn Processing	Columbus	39285	008206	19,038
AGP Soy Processing	Hastings	72698	008794	27,860
Archer Daniels Midland Co	Fremont	9169	008265	3,895
Ash Grove Cement Co	Louisville	4129	004504	22,045
BD Medical Systems	Columbus	38719	008383	0
Bertrand Compressor Station	Loomis	88547	010189	8,576
Bimbo Bakeries USA, Inc	Bellevue	59056	008471	2,120
Burgess Well Company	Minden	27639	007332	1,343
Butler County Landfill, Inc	David City	62743	008812	1,499
C.W. Burdick Gen. Station	Grand Island	54712	008429	422
Cargill Ag Horizons	Albion	1446	008310	1,067
Cargill Inc Polyol Sweeteners	Blair	64401	008787	6,983
Cargill Lactic Acid Plant	Blair	91164	010294	3,274
Cargill, Inc	Blair	57902	008296	24,841
Chief Ethanol Fuels, Inc	Hastings	58049	008315	9,686
City of Wayne	Wayne	47263	008426	3,668
Clean Harbors Environmental Services, Inc	Kimball	58562	008319	26,655
CNH Industrial America, LLC	Grand Island	24371	008395	2,163
David City Municipal Power	David City	4016	008300	0
Douglas Co Recycling Landfill	Bennington	62593	008467	20,874
Douglas County Landfill	Omaha	59516	008244	1,369
Dutton-Lainson Co	Hastings	125	008374	218
Endicott Clay Products	Endicott	27355	008389	8,965

Facility Name	Facility Location	Facility ID	Time Tracking Code	Total Agency Costs
Enron Natural Gas	Palmyra	37514	008325	2,379
Excel Corp	Schuyler	6272	008524	591
Exmark Manufacturing Co	Beatrice	23151	009016	4,146
FLEXcon Company, Inc	Columbus	58429	008223	585
Flint Hills Resources Fairmont	Fairmont	86026	010000	9,498
G & P Development, Inc Landfill	Milford	45275	008825	1,185
Global Equipment Company, Inc	Norfolk	53804	008936	0
Goodyear Tire	Norfolk	53867	008391	5,858
Grand Island Burdick Station	Grand Island		54712	4,887
Grand Island Platte Gen Station	Grand Island		58027	10,196
Grand Island Regional Landfill	Shelton	62812	008809	6,109
Green Plains Atkinson, LLC	Atkinson	86416	010027	0
Green Plains Central City, LLC	Central City	82836	009032	9,591
Green Plains Ord, LLC	Ord	85861	009091	11,717
Green Plains Wood River, LLC	Wood River	86000	009094	9,095
Green Plains	York	59094	008291	8,2943
Hastings Utility – Don Henry	Hastings	58345	008530	234
Hastings Utility – N. Denver	Hastings	55721	008339	855
Hastings Utility – Whelan Energy	Hastings	58048	008338	27,427
Huntsman	Sidney	5456	008392	35
IBP	Lexington	8744	008432	4,106
J Bar J Landfill	Ogallala	63354	008826	1,813
KAAPA Ethanol	Revena	77854	009013	10,783
KANEB Pipeline	Geneva	22282	008343	2,080
KANEB Pipeline	Columbus	39527	008345	441
KANEB Pipeline	Osceola	58738	008482	431
KN Energy	Lexington	8669	008437	352
KN Int. Gas	Albion	1416	008475	1,117
KN Int. Gas	Holdredge	38270	008476	865

Facility Name	Facility Location	Facility ID	Time Tracking Code	Total Agency Costs
KN Int. Gas	North Platte	58735	008477	1,763
KN Int. Gas	Grand Island	24673	008479	74
Koch Fertilizer Beatrice, LLC	Beatrice	23383	008411	9,233
Lon D Wright Power Plant	Fremont	48518	008350	37,992
Natural Gas	Beatrice	23034	008435	152
Natural Gas	Otoe	37669	008470	19
Naturally Recycled Proteins	Wakefield	80265	009061	9,010
NatureWorks, LLC	Blair	69585	008857	4,412
Nebraska City Power Plant # 1	Nebraska City	37388	008353	1,928
Nebraska City Power Plant # 3	Nebraska City	64753	009004	4,110
Nebraska Energy	Aurora	59052	008424	7,750
NNSWC Landfill	Clarkson	62779	008811	2,216
Northern Natural Gas Co	Beatrice	23382	008324	5,248
NPPD Beatrice Power Station	Beatrice	76739	009002	1,225
NPPD Canaday Station	Lexington	8512	008433	12,857
NPPD Gerald Gentleman Station	Sutherland	34385	008396	6,079
NPPD Hebron Peaking Unit	Hebron	58034	008708	134
NPPD McCook Peaking Unit	McCook	39986	008836	71
NPPD Gerald Gentleman Station			000098	1,697
Nucor Corporation	Norfolk	35548	008406	201
Nucor Steel	Norfolk	35677	008267	27,924
OPPD Cass County Station	Plattsmouth	70919	008870	488
OPPD Nebraska City Station	Nebraska City	58343	008355	10,875
OPPD Sarpy County Station	Bellevue	42638	008241	6,434
Pacific Ethanol Aurora West	Aurora	87072	010151	40,849
Papillion CRK-WWTP	Omaha	57789	008436	5,311
PGLA-1	Blair	64258	008451	712
Pioneer Trails Tank Car		86000	001955	54
Plainview Municipal Power Plant	Plainview	38561	008757	1,693

<b>Facility Name</b>	<b>Facility Location</b>	<b>Facility ID</b>	<b>Time Tracking Code</b>	<b>Total Agency Costs</b>
Platte Generating Station	Grand Island	58027	008771	549
Premier Ind.	Mead	43396	008221	698
Sarpy County Sanitary Landfill	Springfield	48856	008828	38
TIGT Big Springs Station	Big Springs	56628	008297	50
Tyson Fresh Meats, Inc	Dakota City	7339	008376	9,067
Union Pacific Railroad	North Platte	60192	008481	14,281
Valero Renewable Fuels Co	Albion	85814	009089	9,170
Vulcraft/Nucor	Norfolk	35548	008406	3,826
Western Sugar Cooperative	Scottsbluff	44141	008225	22,920
Williams Power & Light	Irvington	17738	008462	477

**D. Sector-Specific Costs**



Chart 1 illustrates the program costs by industry sector. The heavy and general industry category 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, Nebraska. Wastewater treatment plants (WWTPs) 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 is 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)**

