

Alternate Fee Structure Proposal

DRAFT 4/17/2013

Overview

- Eliminate Current User Charge Fees and Invoice Process
- Eliminate Manifest Fees
- Eliminate the Waste Reduction Fee
- Implement a Broad Generator “Disposal” Fee
 - With a Notification Fee (Site ID)
 - With an Annual Fee for Oversight of inactive TSDs
- Modified from Disposal Fee discussed in workgroup

EPA ID Number Fee

- \$100 Initial Notification Fee
- Site ID is EPA ID Number
- Unlink from Part 121

Generator Fee

- \$10/ton fee
 - Expansion of WRF
- Hazardous Waste subject to fee
 - Subject to counting for Generator Status
 - CESQG
 - Out of State
 - In-State
 - Eliminate exemptions
- Applies to all waste disposed in Haz Waste LF
 - TSCA, Radioactive, CERCLA

Generator Limits

- Concerns over steep increase
- Soft Upper Limits based on Management Method Code
- Based on Proposal to handle current WRF
- Tiered
- Minimum shipment fee of \$10 if less than 1 ton

Fee Collection

- Designated Facility Collects and Remits
 - Managed at a Facility in Michigan
 - Remits Quarterly
 - No Invoice – Form Provided (address non-payment?)
 - Electronic Submittal
- Generator Remits
 - Managed at an out of state facility
 - Remits annually if <\$50
 - Remits quarterly if >\$50
 - No Invoice – Form Provided
 - Electronic Submittal
- Transporters?

Double Counting

- Fees collected on waste once in entire treatment chain
- Fees are collected at the first in-state designated facility (Trans-ship)
- Designated facilities do not pay on generated waste, if fee was collected already
- Active Licensed Facilities do not pay as generator
- Active Licensed Facilities subject to a minimum annual remittal amount
 - This area still needs work
 - Should this be tiered also?

Long Term Post Closure and Corrective Action Fee

- Inactive Facilities with significant oversight
- Waste Closed in Place
 - Current User Charge Payer
- Corrective Action
 - Engineered Controls
 - New Fee

Penalty

- Non payment by Generator subject to Penalty
- DEQ would enforce
- Penalty is doubled fee

Other License Fees

- Unfinished Discussion
- Unplanned Work
- New Construction and Expansions
 - Revise Fees?
- Major Modifications
 - Add Fee?
- Application Fee
 - Retain or adjust?

Statute Cleanup

- Limited Storage Facility Language Removal
- Eliminate WRF
- Fund Name
- Current Fees
 - Still Collecting
- Hazardous Waste Service Fund
- Certified Health Departments