



STATE OF DELAWARE  
DEPARTMENT OF NATURAL RESOURCES  
& ENVIRONMENTAL CONTROL  
DIVISION OF AIR QUALITY  
STATE STREET COMMONS  
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May 6, 2019

EPA Region III  
Office of Permits and State Programs  
1650 Arch Street  
Philadelphia, PA 19103

ATTENTION: Mike Gordon  
Acting Associate Director

**SUBJECT: Comments Regarding the DRAFT "Title V Operating Permit Program Fee Evaluation" Report**

Dear Mr. Gordon:

Thank you for providing your DRAFT "Delaware Title V Operating Permit Program Fee Evaluation" Report for review and comment by the Department of Natural Resources and Environmental Control ("Department"). The existing Title V program was developed based on the 1993 fee schedule guidance.

In response to your draft report, we have the following comments:

1. The Department requests that EPA include a reference to DNREC's Title V Annual report noting that this report was used extensively as a resource by the EPA staff who performed the fee evaluation and is considered a strength of the program in Delaware.
2. The two recommendations in the draft report have been noted.
3. As a result of the "Updated Guidance on EPA Review of Fee Schedules for Operating Permit Programs Under Title V" (March 27, 2018), the Department will carefully review the revised guidance in preparation for the next reauthorization of Title V Fees anticipated in early 2020.

Thank you for the opportunity to review the draft report. The Department looks forward to continuing to work with EPA on Delaware's Title V program. If you have any questions, please contact me at (302) 323-4542.

Sincerely,

Angela Marconi, P.E., BCEE  
Branch Manager, Engineering and Compliance  
Division of Air Quality

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pc: Dover File  
David Fees, Robert Zimmerman, Tony Manson

*Delaware's good nature depends on you!*