

7-21-2006



Minnesota Pollution Control Agency

July 19, 2006

Legislative Reference Library
645 State Office Building
100 Constitution Avenue
St. Paul, Minnesota 55155

Re: In The Matter of the Proposed Rules of the Minnesota Pollution Control Agency
Governing the Hazardous Waste Fee Formula Rules, Minnesota Rules Chapters 7046

Dear Librarian:

The Minnesota Pollution Control Agency (MPCA) intends to adopt rules governing the hazardous waste fee formula. We plan to publish a Dual Notice of Intent to Adopt Rules in the July 24, 2006, edition of the *State Register*.

The MPCA has prepared a Statement of Need and Reasonableness. As required by Minnesota Statutes, sections 14.131 and 14.23, the MPCA is sending the Library a copy of the Statement of Need and Reasonableness at the time we are mailing our Notice of Intent to Adopt Rules.

If you have any questions, please contact me at 651-296-6603.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Herman", with a long horizontal line extending to the right.

Matt Herman
Environmental Planner / Rule Coordinator
Municipal Division

MH lmg

Enclosure: Statement of Need and Reasonableness

Minnesota Pollution Control Agency

Municipal Division

STATEMENT OF NEED AND REASONABLENESS

**Proposed Amendment to Rules Governing Hazardous
Waste Fees, Minnesota Rules, Chapter 7046**

TABLE OF CONTENTS

STATEMENT OF NEED AND REASONABLENESS

MINNESOTA POLLUTION CONTROL AGENCY

I. INTRODUCTION1

II. ALTERNATIVE FORMAT6

III. STATUTORY AUTHORITY6

IV. REGULATORY ANALYSIS7

V. CONSIDERATION OF ECONOMIC FACTORS9

VI. IMPACT ON FARMING OPERATIONS10

VII. NOTIFICATION OF THE COMMISSIONER OF TRANSPORTATION10

VIII. PERFORMANCE-BASED RULES10

IX. DETERMINATION OF COMPLIANCE COST FOR SMALL BUSINESSES11

X. DEPARTMENT OF FINANCE ASSESSMENT OF FISCAL IMPACT11

XI. ADDITIONAL NOTICE12

XII. STATEMENT OF NEED13

XIII. STATEMENT OF REASONABLENESS14

XIV. LIST OF AUTHORS, WITNESSES, AND APPENDICES24

XV. CONCLUSION25

Appendices

**Minnesota Pollution Control Agency
Municipal Division**

STATEMENT OF NEED AND REASONABLENESS

**Proposed Amendment to Rules Governing Hazardous Waste Fees, Minnesota Rules,
Chapter 7046.**

I. INTRODUCTION

The Minnesota Pollution Control Agency (MPCA) is amending Minnesota Rules, chapter 7046. These amendments will change the hazardous waste (HW) fee formula and collection system. It will also comply with Minnesota Laws 2003, Chapter 128, Article 2, Section 54, which directs the MPCA to revise the HW fee formula to increase the amount collected by \$2 million.

In 1983, the Minnesota Legislature chose to finance a portion of the MPCA's HW Program with fees to be paid by businesses governed by the program. The MPCA appropriation established by the Legislature is met by assessing license fees to HW generators; and hazardous waste treatment, storage, and disposal (TSD) Facilities throughout the state. Currently, the HW program is funded by license fees (50%), and the United States Environmental Protection Agency (EPA) (50%).

In 1983, the Legislature also chose to create a HW generator tax. The tax, established in Minn. Stat. § 115B.22, was paid by HW generators generating more than 100 pounds of HW in a year. The MPCA was directed to deposit the funds collected through the HW generator tax into the Environmental Response, Compensation and Compliance Account. This account was used to fund the remediation activities of the MPCA. The tax was created with a statutory sunset date of January 1, 2004.

The federal funding levels have remained constant since 1996. The federal funding levels are not adjusted on real program needs including inflation and staffing costs. Because of this fact, these stagnant levels have resulted in a "de facto" budget reduction to the program. Between fiscal years (FY) 1996 and 2001, the reduced funding required the MPCA to reduce HW Program staffing from 71 full time equivalents (FTE) staff to 39. This reduced the level of inspections at facilities and generators to a basic level. In addition, the number of rule revisions to maintain EPA HW Program authorization suffered, a permit backlog was created, and training was reduced.

In 2000, the MPCA indicated to the Legislature that the HW License Fees were raising less revenue than needed to support their share (approximately 50 percent) of program activities. The Legislature maintained the level of funding by appropriating \$1,160,000 to erase the existing account deficit and funding the gap for the FY02 through the solid waste management tax. As a result of increasing staff costs, in order to remain within the funding appropriation, the MPCA reduced the staffing level in the HW regulatory area in FY02 by 2 additional FTE which reduced the program to a maintenance level at 37 FTE.

Even at the reduced staffing level and with fund consolidation, the level of the appropriation from the Legislature that must be recovered required a fee increase. The January 2002 *MPCA Funding Audit* published by the Legislative Auditor (see appendix 4) made the following observation:

“MPCA has authority to raise hazardous waste fees administratively, unlike its authority regarding water and air quality fees. In fact, MPCA is required by law to set hazardous waste fees at a level that fully recovers the legislative appropriation for hazardous waste fee expenditures. In recent years, however, MPCA has not increased hazardous waste fees to cover the full appropriation – mainly, it says, because of legislator and industry concerns about fee levels. Thus, the Legislature has had to make up the shortfalls with funding from other sources. MPCA and the Legislature should consider fee increases or statutory changes to ensure compliance with the hazardous waste fee law.”

The *MPCA Funding Audit* also pointed out that the HW Fees have higher administration costs than MPCA’s air quality or water quality fees. The MPCA staff has attributed the high administrative costs to the complicated and intricate nature of the fee formula and the level of data collection and manipulation that is necessary to generate fees on an annual basis.

In 2003, the Legislature allowed the HW tax to sunset and directed the MPCA to use the HW fee formula to collect an additional \$2 million in revenue. This direction was given in 2003 Special Session Law 128, Article 2, section 54:

“(a) The pollution control agency shall collect hazardous waste fees that reflect the fee formula in Minnesota Rules, part 7046.0060, increased by an addition of \$2,000,000 to the adjusted fiscal year target described in step 2 of Minnesota Rules, part 7045.0600.

(b) The increased fees are effective January 1, 2004. The agency shall adopt and amend hazardous waste fee formula incorporating the increase in paragraph (a) under Minnesota Statutes, section 14.389. The pollution control agency shall begin collecting the increased permit fees on January 1, 2004, even if the rule adoption process has not been initiated or completed. Notwithstanding Minnesota Statutes, section 14.18, subdivision 2, the increased fees reflecting the fee increases in paragraph (a) and the rule amendment incorporating those permit fee increases do not require further legislative approval.”

In 2005, the MPCA billed and collected HW fees using the existing fee formula rule and incorporated the additional \$2 million in revenue as directed by 2003 Special Session Law 128, Article 2, section 54.

The combination of the tax revenue into the fee formula posed several problems that this proposed fee formula rule revision is designed to minimize or solve. This rule revision is the MPCA’s response to the legislative direction.

The HW tax revenue and fee revenue had been collected using very different formulas. The tax revenue was collected by a per pound quantity tax, with different rates charged for certain management methods. Because the tax was based solely on quantity generated; the majority (63 - 80 percent) of the tax dollars was paid by metropolitan area generators (see appendix 5). In 2003, the six largest metropolitan area generators paid almost 50 percent of the tax revenue. The existing and proposed HW fee formulas do not direct this large sum of money to such a small number of generators; instead, the proposed formula redistributes the cost across other metropolitan and non-metropolitan generators.

Currently, the HW fee is collected from non-metropolitan area generators using a base fee and a per pound quantity rate. Metropolitan area generators are charged a fee that is calculated as a percentage of the fee that the generator paid to their host metropolitan county. Each of the metropolitan area counties has a unique fee structure, resulting in similar generators paying vastly different county and state fees.

TSD Facilities are responsible for paying a portion of the HW fee appropriation, generally about 25 percent. TSD Facilities are not responsible for paying any of HW generator tax. By collecting the tax revenue through the fee formula, the MPCA would be making the TSD Facilities subject to a very large fee increase that is not representative of past practice. This shift would have been an unintended consequence of the legislation.

Under the current system, the generator fees paid to the state, by metropolitan county generators, have been collected from the generator by the metropolitan county, at the same time that the county was collecting their assessed fees. The county would remit the appropriate funds to the MPCA. The combination of the fee and tax revenue resulted in an increase in the amount of money that would be collected from individual generators by the counties. The metropolitan counties approached the MPCA and asked that the MPCA take responsibility for collecting the state fees, as they anticipated an increase in staff time spent explaining a fee increase that they did not have control over. As a result of this request, and subsequent discussions, the MPCA entered into a Memorandum of Understanding with the metropolitan counties. In 2005, the state of Minnesota (State) began billing and collecting state HW fees from metropolitan area generators. The State taking over the billing and collection functions does not increase the investment by the State needed to collect this revenue. Under the previous tax and fee structure, the State Department of Revenue was responsible for this function; so essentially the state is sending and collecting the same number of invoices. In addition, this rule revision does not create another check that generators will have to write; because the tax is no longer collected, the total number of payments remains the same.

What are the goals of the rule revision?

There are three main goals that MPCA staff used in creating and evaluating different fee formula options and variations. Our first goal was equity. By equity, the MPCA staff means that any future formula should maintain or improve the distribution of fees obtained by the current formula. It is difficult to rank how high a formula rises on an equity scale; it simply depends who you ask. Equity, for MPCA staff, came to mean that the new formula should preserve the current distribution as much as possible but correct any obvious inequities. The second goal was a formula that is reliable and collects the amount of money appropriated by the Legislature. One of the major failings of the current and past systems was their inability to consistently collect the amount of revenue that was appropriated by the Legislature. The third goal was simplicity. MPCA staff desired to create a fee formula that was more understandable. The current system is cumbersome, and full of intricate details that very few people can understand. By creating a system that is more transparent, MPCA will increase the fee payer's ability to understand how they can change their operations to reduce their fee liability. In addition, the MPCA will also decrease the amount of resources needed to administer this fee program.

What does the proposed rule do?

The proposed fee formula will distribute the total HW fee target across the TSD and generator universe. Nineteen percent of the target will be allotted to the TSD Facilities. The individual TSD Facility fees will be calculated using the existing fee calculation system. No changes to how individual TSD Facilities are charged a license fee are proposed at this time.

The remaining 81 percent of the total target will be paid by HW generators; this is the generator target. The generator target is divided between the metropolitan area and non-metropolitan area generators. The metropolitan area generators will be responsible for 40 percent of the generator total, with non-metropolitan generators paying the remaining 60 percent. These values are now the metropolitan and non-metropolitan targets. The values created by this distribution reflect an equitable distribution of fee revenue between metropolitan and non-metropolitan area generators. In 2003, the metropolitan area generators accounted for \$1,713,130 in fee and tax revenue, the non-metropolitan area generators paid \$1,442,863 (see appendix 5). In 2004, when the MPCA collected the combined target using the existing formula, the non-metropolitan area paid \$2,447,354 and the metropolitan area paid \$1,337,018. The proposed formula partially corrects this shift, by setting the distribution at a 60/40 split; with non-metropolitan area paying \$2,171,484 and the metropolitan area paying \$1,447,632. Taking into consideration that the metropolitan area generators pay nearly \$1.5 million in fees to the metropolitan counties, this split is equitable.

The current non-metropolitan area formula charges generator fees using a quantity rate. The quantity rate calculation takes into consideration the size of each individual waste stream and the waste management method for each waste stream. The proposed rule revision seeks to simplify the fee calculation process by charging quantity fees equally to all wastes generated, under a specified cap, regardless of management method or waste stream size. The metropolitan area

formula will also have a maximum quantity cap and will also give no consideration to waste management method. For both the metropolitan and non-metropolitan area, only wastes that count toward generator size will count toward fees.

The metropolitan area target is distributed across all metropolitan area generators using a base fee and a quantity rate fee. The base fee target is calculated by multiplying the metropolitan area generator target by 0.52. The base fee target is then divided by the total number of fee paying generators in the metropolitan area; the resulting value is the metropolitan area base fee. Metropolitan area very small quantity generators (VSQGs) will pay only the base fee. This amount is their annual fee. Large and small quantity generators (LQG and SQG) will pay the base fee and a quantity rate fee. The quantity rate target for the metropolitan area is calculated by subtracting the base fee target from the metropolitan generator fiscal year target. The per pound quantity rate is then calculated by dividing the total eligible pounds by the quantity rate target. Individual quantity fees are calculated as eligible pounds multiplied by the per pound rate. Eligible pounds mean only those pounds of waste that count toward generator size. No quantity fee is charged on waste generated in excess of two million pounds or for wastes that do not count toward generator size. The explanation of why and how a cap level was developed can be found in section XIII of this document.

The non-metropolitan area target is distributed across all non-metropolitan area generators using a base fee and a quantity rate fee. The base fee target is calculated by multiplying the non-metropolitan area generator target by 0.53. The base fee target is divided by the total number of fee paying generators in the non-metropolitan area; the resulting value is the non-metropolitan area base fee. Non-metropolitan area VSQGs will pay only the base fee. This amount is their annual fee. LQG and SQG will pay the base fee and a quantity rate fee. The quantity rate target for the non-metropolitan area is calculated by subtracting the base fee target from the non-metropolitan generator fiscal year target. The per pound quantity rate is calculated by dividing the total eligible pounds by the quantity rate target. Individual quantity fees are calculated as eligible pounds multiplied by the per pound rate. Eligible pounds mean only those pounds of waste that count toward generator size, capped at one million pounds. No quantity fee is charged on waste generated in excess of one million pounds or for wastes that do not count toward generator size. The explanation of why and how a cap level was developed can be found in section XIII of this document.

This proposed formula establishes several values that distribute fees across the different sizes of generators. These values are chosen because they reflect an equitable distribution of fees. These values were determined by closely examining the fee distribution over the past several years. In the past, some of these values had been calculated annually, using a staff time survey. The current rule proposed formula will use these selected values until a rulemaking is undertaken to change them.

The proposed rules contain a number of other changes that will affect how the MPCA calculates and collects the HW fees. The rules change the manner in which fee payers may appeal or disagree with the amount of the assessed fee. The current language is being replaced with language used in other MPCA fee rules. It has been proven to be an effective process. The

proposed fee rules also contain a provision that will allow the MPCA to increase the fee target by up to five percent as a way to account for anticipated non-payment of some fees.

II. ALTERNATIVE FORMAT

Upon request, this Statement of Need and Reasonableness (SONAR) can be made in an alternative format, such as large print, Braille, or cassette tape. To make a request, contact Matt Herman at the Minnesota Pollution Control Agency, Municipal Division, 520 Lafayette Road North, St. Paul, MN, 55155-4194; telephone (651) 296-6603; fax (651) 297-8676; or e-mail matthew.herman@state.mn.us TTY users may call the MPCA at (651) 292-5332 or 1 (800) 657-3864.

III. STATUTORY AUTHORITY

The MPCA's statutory authority to adopt the rules is set forth in Minnesota Statutes section (Minn. Stat. §) 116.12, subd. 1, which provides:

“The agency shall establish the fees provided in subdivisions 2 and 3 to cover expenditures of amounts appropriated from the environmental fund to the agency for permitting, monitoring, inspection, and enforcement expenses of the hazardous waste activities of the agency”

Furthermore the MPCA was given the following directive by legislature in Minnesota Laws 2003, Chapter 128, Article 2, Section 54:

“(a) The pollution control agency shall collect hazardous waste fees that reflect the fee formula in Minnesota Rules, part 7046.0060, increased by an addition of \$2,000,000 to the adjusted fiscal year target described in Step 2 of Minnesota Rules, part 7045.0600.

(b) The increased fees are effective January 1, 2004. The agency shall adopt and amend HW fee formula incorporating the increase in paragraph (a) under Minnesota Statutes 14.389. The pollution control agency shall begin collecting the increased permit fees on January 1, 2004, even if the rule adoption process has not been initiated or completed. Notwithstanding Minnesota Statutes, section 14.18, subdivision 2, the increased fees reflecting the fee increases in paragraph (a) and the rule amendment incorporating those permit fee increases do not require further legislative approval.”

Under these statutes, the MPCA has the necessary statutory authority to adopt the proposed rule amendments. This rulemaking is a rule amendment; therefore, Minn. Stat. § 14.125 does not apply.

IV. REGULATORY ANALYSIS

Minn. Stat. § 14.131, sets out seven factors for a regulatory analysis that must be included in the SONAR. Paragraphs one through seven below quote these factors and then give the MPCA's response.

“(1) a description of the classes of persons who probably will be affected by the proposed rule, including classes that will bear the costs of the proposed rule and classes that will benefit from the proposed rule”

The effect of this rule revision will be felt by all businesses and organizations that are licensed to generate HW in the state of Minnesota. These businesses and organizations range from local auto service stations to some of the largest companies in Minnesota. These entities are located across the state with roughly 60 percent located in the metropolitan area. Appendix 1 contains the calculator that was used to model the fee formula. Appendix 2 contains the data that was generated by the calculator. Please contact the MPCA contact person for further information on the modeling or the results.

The MPCA's current modeling indicates that the effects of applying this new fee structure will vary from business to business and from region to region across the state. There are currently 2891 generators in the non-metropolitan area: 2494 are VSQGs, 340 are SQGs and 57 are LQGs. Based on current modeling data, all non-metropolitan VSQGs will see a decrease of approximately five percent from 2004 fee levels. Only 41 or 1.4 percent of the 2891 non-metropolitan generators are expected to see a fee increase.

The effects of this change are harder to gauge for metropolitan area generators. Because all of the metropolitan counties have a unique fee system, information pertaining to past fee levels are not readily available. In the future, MPCA staff will maintain a data set to show what each generator paid to the State. Staff was unable to attain all of the data necessary to calculate the modeled or anticipated fee under the new formula, for all of the metropolitan area counties. Anoka, Hennepin, Ramsey, Washington, and Carver counties were able to provide waste generation and fee data that allowed MPCA staff to run modeling to predict the anticipated fee, had the proposed formula been used for the 2004 billing cycle. With large and small counties as well as a relatively high fee county and a relatively low fee county being represented in this sample; MPCA staff determined that this sample size provided an adequate cross section of the metropolitan area generators.

The metropolitan area sample contained 3658: generators; 2951 VSQGs, and 707 LQGs and SQGs. Of these generators, MPCA staff found that 2214 generators would receive a fee increase and 1444 would receive a fee decrease. The vast majority of these increases are the result of flattening the fee paid by metropolitan area VSQGs. In 2004, the fee paid to the state by metropolitan area VSQGs ranged from over \$800.00 to \$22.00, with an average of \$149.00. The proposed formula would result in all metropolitan area VSQGs paying a flat fee of \$175. This would represent a fee increase for 2077 VSQGs and a decrease for 874, with an average increase of \$64.00. For metropolitan area SQGs and LQGs, there is a different pattern; a pattern with far more decreases than increases. Of the 707 SQGs and LQGs that were modeled, from five

different counties, MPCA staff found that 570 of the generators would receive a fee decrease and 137 would receive a fee increase, with the average affect being a fee decrease of 16.3 percent.

“(2) the probable costs to the agency and to any other agency of the implementation and enforcement of the proposed rule and any anticipated effect on state revenues”

There will be little or no additional cost to the MPCA or other state agencies for implementing and enforcing this rule. A system to assess and collect fees already exists. This revision entails a simplification of many administrative procedures that needed to be completed to create the invoices. This fee formula revision will ensure that the agency is able to collect the appropriated \$4,468,000 for this fiscal year, and into the future. The proposed formula will bring the MPCA into compliance with statute, as was recommended by the most recent report from the Office of the Legislative Auditor. This rule revision marks a step closer to more efficient government procedures such as online billing and “e-payment.”

“(3) a determination of whether there are less costly methods or less intrusive methods for achieving the purpose of the proposed rule”

There are no less costly or intrusive methods that the MPCA could use to achieve the purposes of this rule revision effort. The total cost of the collection is the legislatively established target, altering that target would require legislative action, and is outside the scope of this effort.

“(4) a description of any alternative methods for achieving the purpose of the proposed rule that were seriously considered by the agency and the reasons why they were rejected in favor of the proposed rule”

The MPCA could have taken a narrow interpretation of Minnesota Laws 2003, Chapter 128, Article 2, Section 54, and simply used the current formula to collect the additional allocation of \$2 million. Because the existing formula allocates a percentage of the target to TSDs and because TSDs have never been responsible for paying the tax, this action would have resulted in shifting a large portion of the revenue from generators to TSD Facilities, which was not the intent of the legislation. This dramatic shift would have been caused by the fact that the facilities were not subject to the HW tax. Alternatively, the MPCA could have made the above clarification and continued to use the old fee formula. This would have resulted in the MPCA not making any advancement in the areas of equity, simplicity, or efficiency.

Hundreds of fee formula systems and variations were modeled and analyzed as part of this rule revision effort. The system that is being proposed was the result of an extended public comment period that included five public meetings, extensive internal analysis, and multiple meetings with affected groups.

“(5) the probable costs of complying with the proposed rule, including the portion of the total costs that will be borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals”

The fee formula proposed will result in the collection of \$4,468,000. This is the same dollar amount that was collected in the FY 2005 billing cycle for wastes generated in 2004. The \$4,468,000 is an increase of approximately \$700,000 from the amount collected in the FY 2004 billing cycle for wastes generated in 2003. The increase from FY 04 to FY 05 is attributed to the fact that the HW tax only collected approximately \$1.3 million in the FY04 collection, and the MPCA is now collecting the full additional appropriation of \$2 million.

“(6) the probable costs or consequences of not adopting the proposed rule, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals”

If the fee formula rule revisions are not adopted, the MPCA will have to use the current fee formula to collect the revenue. If the current fee formula is used, the TSD Facilities would see a large increase because the additional \$2 million in revenue that is being collected was originally the responsibility of generators, not TSD Facilities. The collecting of the tax and fee revenue using the current fee formula causes several other problems. A small number of large generators would receive reductions in total payments, with that revenue being redistributed across all other generators. Using the existing fee formula to collect all of the revenue will also result in a significant shift in fee burden from the generators in the metropolitan area to generators in the non-metropolitan area.

“(7) an assessment of any differences between the proposed rule and existing federal regulations and a specific analysis of the need for and reasonableness of each difference”

There are no existing federal regulations that direct the creation or implementation of state HW fee formula systems.

V. CONSIDERATION OF ECONOMIC FACTORS

Minn. Stat. § 116.07, subd. 6 states:

“In exercising all its powers the Pollution Control Agency shall give due consideration to the establishment, maintenance, operation and expansion of business, commerce, trade, industry, traffic, and other economic factors and other material matters affecting the feasibility and practicability of any proposed action, including, but not limited to, the burden on a municipality of any tax which may result there from, and shall take or provide for such action as may be reasonable, feasible, and practical under the circumstances.”

The proposed rule will have some impact on the economy, in that the fee payers are predominantly businesses. The overall impact on the economy will be minimized by the fact that MPCA is not proposing to collect additional revenue. The proposed fee formula will only alter the way the current fee dollars are collected from the universe of generators and TSD Facilities. Any impact will be further limited by the fact that all available modeling indicates that there will

be far more generators that see a fee decrease than a fee increase. As an example only 41 of the 2891 (1.4 percent) non-metropolitan area generators will experience a fee increase.

The current fee formula charges metropolitan area generators a state license fee that is calculated as a percentage of the fees paid to the host county. This system has led to an inequitable system that requires similar businesses in different counties to pay vastly different fees to the state. The proposed fee system would charge equal fees to generators that generated the same amount of waste, regardless of where the business was located. Through the public comment process, MPCA staff heard that this balancing of fees within the metropolitan area would be a positive effect for businesses.

The proposed fee system would have little or no negative impact on local units of government. Metropolitan county programs will likely see a resource savings as the state takes over billing and collection of the state license fees that are charged to metropolitan generators. To the extent that some local units of government are HW generators, this rule will change the way that their individual generator fees are calculated.

VI. IMPACT ON FARMING OPERATIONS

Minn. Stat. § 14.111, is inapplicable because the proposed rule amendments do not affect farming operations. It is possible that some farming operations could be HW generators, but it would be rare to find a farming operation that generated HW in quantities over 100 pounds per year. Businesses that generate less than 100 pounds per year are exempt from this chapter.

VII. NOTIFICATION OF THE COMMISSIONER OF TRANSPORTATION

Minn. Stat. § 174.05, requires the MPCA to inform the Commissioner of Transportation of all rulemakings that concern transportation, and requires the Commissioner of Transportation to prepare a written review of the rules.

The MPCA believes that the proposed amendments will not impact Department of Transportation (MnDOT) activities or transportation concerns. Therefore, the MnDOT was not notified of this rulemaking per this chapter. If any specific MnDOT facility is a licensed HW generator and could be impacted by this rule, they will be individually notified as part of the additional notice plan detailed in this document.

VIII. PERFORMANCE-BASED RULES

Minn. Stat. § 14.002 and 14.131, require that the SONAR describe how the agency, in developing the rules, considered and implemented performance-based standards that emphasize superior achievement in meeting the agency's regulatory objectives and maximum flexibility for the regulated party and the agency in meeting those goals.

The proposed fee rule revision system is performance based. The MPCA allows the individual generators to affect the fee they pay by controlling how much waste they generate. This outcome is an improvement realized by the proposed fee formula.

IX. DETERMINATION OF COMPLIANCE COST FOR SMALL BUSINESSES

Minn. Stat. § 14.127 subd. 1 requires an agency to determine if the cost of complying with a proposed rule in the first year will exceed \$25,000 for any one business that has less than 50 full-time employees or any one home rule charter city that has less than 10 full-time employees. If it is found that this threshold is exceeded, any business that has less than 50 full-time employees or any one home rule charter city that has less than 10 full-time employees, may file a written statement with the agency claiming a temporary exemption from the rules, until the rules are approved by a law.

This provision does not apply to this rulemaking. The current modeling data indicates that the proposed fee formula will not result in a fee increase of over \$25,000 for any one business that has less than 50 full-time employees or any one home rule charter city that has less than 10 full-time employees. This determination was made using the modeling data available in Appendix 2, and the 2005 Harris Minnesota Directory of Manufacturers.

X. DEPARTMENT OF FINANCE ASSESSMENT OF FISCAL IMPACT

Minn. Stat. § 14.131, require that the agency consult with the commissioner of finance to help evaluate the fiscal impact and fiscal benefits of the proposed rule on units of local government. The agency must send a copy of the statement of need and reasonableness to the Legislative Reference Library when the notice of hearing is mailed under section 14.14, subdivision 1a.

The proposed rule amendments will have little or no fiscal impact on local units of government. The metropolitan area counties are currently responsible for billing and collecting the state HW fees from the generators in their county. Under these proposed revisions, the state will bill and collect these fees. This shift will represent a reduction in staff time efforts for the metropolitan counties. Under the new system, the counties will be responsible for providing the MPCA with the generator information that is necessary to assess, bill, and collect fees from the metropolitan area generators. The small administrative cost (for seven counties) associated with this data transfer is the only real fiscal impact on local units of government. Some local units of government are HW generators. If a local unit of government is a HW generator, their fee will likely change as a result of this rulemaking. Most government operations would be VSQGs, as discussed earlier in this document, the proposed fee formula would result in metropolitan area VSQGs paying a \$175 fee and non-metropolitan area VSQGs paying \$400. This represents a fee decrease for many metropolitan area generators and a decrease for all non-metropolitan area generators.

XI. ADDITIONAL NOTICE

Minn. Stat. § 14.131 and 14.23, require that the SONAR contain a description of the agency's efforts to provide additional notice to persons who may be affected by the proposed rules or explain why these efforts were not made.

On November 24, 2003, the MPCA published in the *State Register* Volume 28, Number 21 a notice requesting comments on this planned rulemaking. The same notice as published in the *State Register* was also placed on the MPCA's Public Notice Web site. On April 5, 2004, an amended notice requesting comments on this planned rulemaking was published in the *State Register* Volume 28, Number 40. This amended notice was published to clarify the intent and scope of this rulemaking. This notice was also placed the MPCA's Public Notice Web site.

The MPCA also provided the following additional notice:

1. February 2004 - HW license mailing to all non-metropolitan area generators and TSDs
2. June 9, 2004, - TSD facility public meeting in St Paul, MN
3. December 2004 - HW license mailing to all non-metropolitan area generators and TSDs
4. December 2, 2004, - meeting with Chamber of Commerce
5. November 22, 2004, - meeting invitation mailing to all non-metropolitan area generators
6. December 14, 2004, - public meeting in Mankato, MN
7. December 17, 2004, - public meeting in St Paul, MN
8. December 21, 2004, - public meeting in Brainerd, MN
9. March 2005 - HW Fee act sheet update
10. Metropolitan County HW license invoice mailing insert, sent to all metropolitan area generators
11. August 17, 2005, meeting invitation mailing to all metropolitan area generators
12. September 8, 2005, public meeting in St Paul, MN
13. September 15, 2005, public meeting in St Paul, MN
14. MPCA informational Web site: <http://www.pca.state.mn.us/waste/hwrules.html>

The MPCA intends to mail a copy of the Notice of Intent to Adopt to the following people and organizations:

1. All parties who have registered with the MPCA for the purpose of receiving notice of rule proceedings as required by Minn. Stat. § 14.14, subd. 1a.
2. All individuals and representatives of associations that the MPCA have on file as interested and affected parties.
3. The chairs and ranking minority party members of the legislative policy and budget committees, with jurisdiction over the subject matter of the proposed rule amendments, will receive a copy of the proposed rule amendments, SONAR, and notice as required Minn. Stat. § 14.116. This statute also states that if the mailing of the notice is within two years of the effective date of the law granting the MPCA authority to adopt the proposed rules, the MPCA must make reasonable efforts to

send a copy of the notice and SONAR to all sitting house and senate legislators who were chief authors of the bill granting the rulemaking. This provision does not apply because there is no new law requiring the MPCA to adopt these rules.

4. All licensed HW generators and TSD Facilities in the state of Minnesota.
5. Local environmental interest groups.

In addition, a copy of the notice, proposed rule amendments, and SONAR will be posted on the MPCA's Public Notice Web site at (www.pca.state.mn.us/news.index.html).

The Additional Notice Plan also includes giving notice required by statute. The MPCA staff will mail the rules and Notice of Intent to Adopt to everyone who has registered to be on the MPCA's rulemaking mailing list under Minn. Stat. § 14.14, subd. 1a. The MPCA staff will also give notice per all other applicable statutory requirements.

The MPCA believes its regular means of notice as required by Minn. Stat. § 14.14, subd. 1a, including publication in the *State Register* and on the MPCA's Public Notice Web page will have adequately placed other persons affected by these rules on notice of this rulemaking.

XII. STATEMENT OF NEED OF THE PROPOSED RULE AMENDMENTS AS A WHOLE

Minn. Stat., ch. 14, requires the MPCA to make an affirmative presentation of facts establishing the need for and reasonableness of the rules as proposed. In general terms, this means that the MPCA must not be arbitrary or capricious. However, to the extent that need and reasonableness are separate, "need" has come to mean that a problem exists that requires administrative attention, and "reasonableness" means that the solution proposed by the MPCA is appropriate. The need for the rule is described below. This section will discuss the need for the rule amendments as a whole. Section XIII (a) will discuss the need for some individual parts of the rule amendments.

Revisions to the HW Fee formula are needed because the 2003 Legislature has directed the MPCA to revise the fee formula to include an additional or \$2 million into the fee formula to account for the revenue lost when the HW generator tax was sunset. See Part I for a discussion of the background for this rulemaking and Part III for the Statutory Authority. If the MPCA does not complete a rulemaking, the MPCA may face the loss of over \$4 million in revenue. This revenue is needed to fund the important environmental protection work, done by many divisions of the MPCA. Additionally, the MPCA has concluded that a simplification of the fee formula is needed to allow HW generators to understand how they can control the fee that they are required to pay.

XIII. STATEMENT OF REASONABLENESS

Minn. Stat. ch. 14 requires the MPCA to explain the facts establishing the reasonableness of the proposed rule amendments. "Reasonableness" means that there is a rational basis for the MPCA's proposed action. The reasonableness of the proposed rules is explained in this section. This section is broken into two main parts: A. Reasonableness as a whole; and B. Need and Reasonableness of the individual rule parts.

A. REASONABLENESS OF THE PROPOSED RULE AMENDMENTS AS A WHOLE

The reasonableness portion of the SONAR provides the discussion and background on why and how certain provisions of the proposed rules were established. This Part discusses the reasonableness of the proposed rules as a whole. The reasonableness of specific requirements is discussed under Part B.

The focus of this proposed rulemaking is to create a HW fee system that will allow the MPCA to efficiently and equitably assess and collect HW fees from TSD Facilities and generators. The fee system must be reliable; it must collect the legislatively appropriated target each and every year. An emphasis is also placed on simplifying the system. The current formula is very complex and hard to understand. It is reasonable to simplify this system so that fee payers can better understand the basis for the assessment and how to reduce their fees.

Maintaining the current fee system for TSD Facilities is a reasonable decision. The current system for assessing fees to TSDs is understandable, efficient and effective. Creating two generator calculation systems, one for metropolitan and one for non-metropolitan, is a reasonable system. Calculating these fees under separate systems allows the formula to adequately address the different characteristics of each region, and the fact that the metropolitan area generators are also responsible for paying fees to their host county.

All together this proposed fee systems represents a simple, efficient, and understandable formula that will consistently collect the full legislative appropriation.

B. NEED AND REASONABLENESS OF INDIVIDUAL PARTS OF THE MINNESOTA RULE

This Part addresses the need and reasonableness of each rule part and attempts to answer questions about what each rule requirement is intended to do, why it is needed, and why it is reasonable. Some rule parts are obvious as far as their need and reasonableness and therefore are only explained briefly, while others are explained in more detail for future rule interpretation.

Part 7046.0010 Definitions

Subpart 11. Metropolitan area generator. This subpart adds a definition of Metropolitan County, a term that is used in the rules. The definition is needed and reasonable because consistent with the definition of metropolitan county in Minn. Stat. § 473.121.

Part 7046.0020 Hazardous Waste Facility Fees

Subpart 1. Fee schedule for five year permits. The change in this subpart is to update a reference to an amended portion of the rule, and to remove the reference to fiscal year 1994, which was the first year of the original formula implementation. This change is needed and reasonable because it updates the language to remove inapplicable provisions.

Part 7046.0031 Non-metropolitan Area Generator Fees

Subpart 1. Basis of fees. The changes in this subpart are to update a reference to an amended portion of the rule. This change also deletes reference to a statewide program fee, which is a reference to a fee calculation used in the old formula. This change is needed and reasonable because it updates the language to reflect the current practice.

Subpart 4. Annual fees. The revisions in this subpart establish the system of calculating and assessing a base fee for all generators and a quantity fee for small and large quantity generators. These changes are needed because the Legislature directs the MPCA in Minn. Stat. § 116.12 to assess fees based on the amount of waste generated.

Item A. Base fee. The changes in this item change the term minimum fee to base fee, which is a more appropriately describes how the fee will be calculated for individual generators. This change also updates a reference to an amended portion of the rule. These changes are needed and reasonable because they better explain and describe the proposed new fee system.

Item B. Quantity fee. The changes in this item describe how the quantity fee will be assessed and updates several references to other amended portions of the rule. The change indicates that only those wastes that count toward generator size will be used to calculate a fee. This change is needed and reasonable because it reduces the complexity of the formula. It clearly defines what wastes will be subject to a quantity fee based on existing HW Rules (Minn. R. 7045.0206) defining what wastes count toward generator size. It is also needed and reasonable to refer to only those wastes that count toward generator size because the rules pertaining to generator size determination contain a number of exemptions for some waste streams that are recycled or treated to a non-hazardous state.

There are many portions of subpart 4 of this rule that have been deleted. The quantity rate table was previously used to establish five different step rates, used in determining a generators quantity fee. This table served to reduce the rates charged to each individual waste stream, as that waste stream increased in size, with no fee being charged on any waste generated in excess of 500,000 pounds or 50,000 gallons. It is needed and reasonable to delete this portion of the rules as it will increase the fee payers ability to understand the formula and its effect. The current rate table resulted in a reduction in the total amount of waste that was subject to a quantity fee. The proposed formula will still limit the amount of waste subject to quantity fees, but will accomplish this using a cap rather than a complex table. The cap (discussed later in this SONAR) will limit all non-metropolitan area generators to a maximum of one million pounds. It

is needed and reasonable to do this, as a to ensure that no individual entity pays a disproportionate fee, and the fee structure is not overly-reliant on a small number of very large generators. If the fee collection relied on a small number of generators to collect the necessary funds, a change by one of the generators could result in fee level variation or under collection of funds. The MPCA, in response to the State Auditor, needs to have a system in place to guard against under collection. During public meetings, MPCA staff was told by fee payers that consistency in fee levels is an important attribute. Creating a quantity rate cap is needed to minimize fee level variability over time.

Another significant deletion in subpart 4 of this rule is the deletion of the management method factors. These management method factors were used to reduce the quantity fee that was charged on waste streams that were managed in several different ways, including recycling, pretreatment and others. It is needed and reasonable to delete the management method factors because the benefits of having this type of behavior changing tool in a fee formula has realized all or most of the benefit it could. Since the early 1990's, when this rule was promulgated, the management method factors have influenced how waste is managed. At this time, the benefits of continuing this complex system are quite small. It is reasonable to delete this item because the most predominant economic factor that leads an organization to select a management method is the cost of disposal, not pennies-on-the-pound in generator fees. This change represents a reasonable shift from rewarding management of hazardous waste to rewarding the elimination of hazardous waste. The major emphasis created by this change is on reducing the amount of wastes generated, not merely managing in some preferred manner.

Subpart 6. Payment schedule. In this revision, the MPCA is removing the prescriptive requirement to have the check for the payment made out to the commissioner. The MPCA is proposing to replace this requirement with the requirement to remit payment as directed on the invoice. It is needed and reasonable to make this change to accommodate future billing and collection systems that may provide other efficiencies.

Subpart 7. Penalty for late payment of fees. This subpart is being revised to assess equal late fees for all generators. Prior to this amendment, there were two late fee structures, one for small and large quantity generators and one for very small quantity generators. Under these proposed revisions, all three sizes of generators would be charged a ten percent late fee for the first two 30-day periods and then 15 percent for each additional 30-day period, or fraction of a 30-day period, thereafter. The change is needed to respond to the Legislative Auditors comments regarding MPCA's overall late fee system. The change is reasonable because it will fairly assess equal late fees regardless of a generators size, reflecting that collection costs are the same regardless of generator size.

Part 7046.0040 Metropolitan Area Generator Fee

The amendments to this part represent a major revision to how fees are calculated and collected from generators in the metropolitan area. The old system of determining a State Wide Program Fee factor (SWPF) that would be added to every generators fee (metropolitan and non-metropolitan), is being replaced by a formula that is nearly identical to the formula used in part

7046.0031 to calculate fees for non-metropolitan area generators. Under the old SWPF system, the formula calculated a percentage and each generators fee (metropolitan or non-metropolitan) was multiplied by that percentage with the product being added to the original fee to make the total fee. The effect of this system was that each metropolitan area generator paid a state fee that equaled an annually determined percentage of their county fee. A change in the fee structure is needed to bring some equity into the metropolitan area fee system and to account for the significant difference in County fees. HW generators should be charged the same State fee regardless of which of the seven counties they do business. State program requirements are based on size and the fees should reflect this. The proposed fee formula for metropolitan area generators is reasonable because it charges fees based on the amount of waste generated, eliminating the variability in county fees and determining state fees. It is also reasonable to calculate and assess all VSQGs a flat or base fee.

Having the metropolitan area fee calculation be separate and removed from the non-metropolitan area calculation is needed and reasonable because the metropolitan and non-metropolitan areas have very different generator populations. This separate system also helps account for the fact that the metropolitan area generators are responsible for paying an annual fee to their host county and reflects a legislative requirement detailed in Minn. Stat. § 116.12, subd. 2 (3)C. Metropolitan counties assist the State in conducting inspections and it is appropriate and necessary that the fees reflect this difference.

Subpart 3. Payment schedule. This subpart establishes a payment schedule for small and large quantity generators that requires the payment be made within 50 days, and that VSQGs must submit payment within 35 days. This schedule is the same as the schedule for non-metropolitan area payments; and is reasonable because it allows sufficient time for the generators to submit fees, and is needed to allow the state to collect the revenue in a timely manner.

Subpart 4. Penalty for late payment of fees. This subpart establishes penalties for late payment of fees that are the same as the penalties that are assessed to non-metropolitan area generators. Under the proposed rules, all generators will be subject to a late fee that is ten percent of the fee amount, for each of the first two 30-day periods that the bill is late. A 15 percent penalty is assessed for each 30-day period, or portion of a 30-day period, thereafter. This subpart is needed and reasonable because it encourages prompt payment of fees and allows the state to assess and collect a fair late fee when payment is not made. The allotted time periods and late fee levels are used in the current system have been proven to be reasonable. The amount of late fee is reasonable because it reflects the cost of collecting the late payment.

Part 7046.0045 Retroactive Fee

Subpart 3 item A, B, and C. The changes in this section are made to update references to amended portions of the rule, and to remove the reference to the SWPF, which is not calculated or collected under the proposed fee system. These changes are need and reasonable because they update references and language to reflect the proposed fee system.

Part 7046.0050 Generator Fee Exemptions

The changes in this part are being made to reflect that only those wastes that count toward generator size determination in part 7045.0206, will count toward generator fee. The addition of subpart 7 expressly exempts those wastes that do not count toward generator size, and the other revisions are needed to clarify and simplify the part. This shift is needed and reasonable to simplify how the fees are calculated and use an existing, well understood, universe of waste streams to calculate the fees. These changes should result in a far better understanding, by staff and fee payers, of how fees are charged and which specific waste streams are exempt from fees. It is also reasonable to refer to only those wastes that count towards generator size because the rules pertaining to generator size determination contain a number of exemptions for some waste streams that are recycled or treated to a non-hazardous state.

Subpart 1a. Exemption for 100 pounds or less. This subpart is being amended to clarify that both metropolitan and non-metropolitan generators that generate less than 100 pounds in a year are exempt from the license fees in this part. This is needed and reasonable because generators who generate less than 100 pounds per year are minimal generators and not subject to the same level of regulation as larger generators. Nothing in this part precludes a metropolitan county from charging fees to generators who generate less than 100 pounds per year.

Subpart 1b. Metropolitan area quantity rate exemption. This subpart establishes a cap for wastes that are subject to the quantity fee in the metropolitan area. It is reasonable to establish a cap to reduce variability in fee amounts from year to year and to ensure that no individual generator is charged a disproportionately large fee. Establishing a cap will also ensure that the system does not become over-reliant on a small number of very large generators. If the fee collection relied on a small number of generators to collect the necessary funds, a change by one of the generators could result in fee level variation or under collection of funds. The MPCA, in response to the State Auditor, needs to have a system in place to guard against under collection. During public meetings MPCA staff was told by fee payers that consistency in fee levels is an important attribute. Creating a quantity rate cap is needed to minimize fee level variability over time.

Subpart 1c. Non-metropolitan area generator quantity rate exemption. This subpart establishes a cap for wastes that are subject to the quantity fee in the non-metropolitan area. It is reasonable to establish a cap to reduce variability in fee amounts from year to year and to ensure that no individual generator is charged a disproportionately large fee. Establishing a cap will also ensure that the system does not become over-reliant on a small number of very large generators. If the fee collection relied on a small number of generators to collect the necessary funds, a change by one of the generators could result in fee level variation or under collection of funds. The MPCA, in response to the State Auditor, needs to have a system in place to guard against under collection. During public meetings, MPCA staff was told by fee payers that consistency in fee levels is an important attribute. Creating a quantity rate cap is needed to minimize fee level variability over time.

Subpart 2a. PCB Waiver. This subpart was established to reflect a number of wastes that were specifically managed through the MPCA Special Waste Pilot Program. Through the pilot

program, these wastes were managed outside of the Resource Conservation and Recovery Act (RCRA) and accordingly, this part exempted those wastes from RCRA fees. In recent years, the MPCA has terminated the pilot program and has replaced it with the Universal Waste Rules, part 7045.1400. All wastes managed in accordance with part 7045.1400 are exempt from generator size and, therefore, exempt from fees per the Subpart 7 exemption that will be discussed below. It is reasonable to delete items A-K because these wastes are either exempt from generator size or no longer covered under the pilot program or the universal waste rules. The addition of the exemption for Polychlorinated biphenyl (PCB) waste managed in accordance with Minn. Stat. § 116.07 subd. 2b(b) is needed and reasonable because it maintains compliance with a recently passed statutory obligation.

Subpart 3. This subpart was revised to update statutory references. It is needed and reasonable that all statutory references are current and accurate.

Subpart 7. Waste that is exempt from generator size determination under part 7045.0206 subp. 5. The addition of this subpart adds clarity to the question of what wastes count towards fees and what wastes do not. The current formula assesses fees to many different waste streams differently, and some wastes do not count towards size, but do count toward fees. This system is complex and difficult to understand. It is reasonable to simplify this area of the rules by correlating the wastes that count toward fees to existing rules on what waste counts toward generator size.

7046.0060 Fee Formula

The revisions in this part reflect the most substantive changes to the rule. The steps detailed in this part provide a detailed description of how the fee formula distributes the overall target across the entire universe of generators. Changes to these steps are needed to create a system that is simpler and transparent.

Step 1. This step is simply the identification of the legislatively appropriated target. The proposed edits in this step will clarify and simplify the function of the step, which is to identify the amount of money appropriated by the Legislature. These changes are reasonable because have little or no affect, other than simplifying the language.

Step 2. In this step, the MPCA will add \$2 million to the fiscal year target in step 1. This change is needed and reasonable because it is required by Minn. Laws 2003, 128, Article 2, section 54. Through this law, the Legislature directed the MPCA to collect an additional \$2 million in revenue using the fee formula in chapter 7046. This revenue had originally been collected from HW generators using the HW (Superfund) Tax, which was allowed to sunset in 2004. Without ensuring the \$2 million is added the appropriate revenue could not be collected.

Step 3. Adding this step is designed to minimize the chances that the fee system will under-collect its target. Every year, a small percentage of fee invoices are not paid. By adjusting the target ahead of time, the MPCA is prepared for this occurrence and the fee target is adjusted accordingly. Similar adjustment provisions are included in other agency fee systems and have

been successful. This step is needed and reasonable because it will ensure that the MPCA reaches or more closely approaches the collection goal each year. If the collections do not reach the target in one billing cycle, the shortfall is simply added to the target in the next billing cycle, so the emphasis should be placed on collecting the money when it is appropriated, not down the road and on top of another years appropriated target.

Step 4. In this step, the fiscal year target is increased or decreased by the carryover or shortfall from the pervious billing cycles. It is needed and reasonable to have this provision to ensure that the fiscal year target is reached and not exceeded.

Step 5. For the purposes of completing calculations in future steps, it is necessary to calculate the amount of revenue that would be generated by existing facilities using baseline facility fees in part 7046.0020. It is reasonable to collect the information needed to execute the formula.

Step 6. In this step, the MPCA will allocate 19 percent of the fiscal year target to the TSD Facilities. In past years, this number has been generated as the result of a staff time allocation survey. This practice is time consuming and assumes that the MPCA is attempting to assess the fees directly based on the amount of services provided, that is not the case. This formula seeks to establish an efficient, effective and equitable formula for generating revenue, not correlate a fee to a specific service that was provided. In order to maintain some level of equity, MPCA staff researched how much revenue has been collected from TSD Facilities over the last few years. The research found the TSD percentage of the total fee target was generally twenty five.

When determining how much revenue the proposed system should collect from TSDs, the MPCA considered this historical fee payment percentage and the fact that the TSD universe was not responsible for paying any of the HW (superfund) tax. In 2003 (the last year of separate fee and tax collection), the total amount of fee revenue collected from TSDs was \$629,340. In 2003, TSDs paid \$0 of the tax revenue, it was not charged to them. In 2003, the tax collected \$1.3 million in revenue from generators. Because the Legislature directed the MPCA to collect an additional \$2 million in revenue, the MPCA will generate about \$700,000 in "new revenue." It is reasonable to have the TSD facilities pay some percentage of the "new revenue." If the MPCA combines the 2003 TSD total payments (\$629,340) and 25 percent of the "new revenue" ($\$700,000 \cdot .25 = \$175,000$), the total is \$804,340 or just over 18 percent of the total \$4,468,000 fiscal year target. The MPCA feels it is needed and reasonable to round this figure up to 19 percent to ensure under collection of fees is not built into the fee formula. It is reasonable to allocate 19 percent of the fiscal year target to the TSD facilities.

Step 7. This step discusses how the TSD Facility fee target will be distributed across all TSD Facilities. This rulemaking does not change how to assess individual TSD Facility fees. It is reasonable to leave this portion of the rule in place because it is an efficient and equitable system that is widely understood by those that use the current fee system. This step was changed to reflect proper citations and references to other amended portions of the rule.

Step 8. In this step, the MPCA will calculate the fiscal year target for generators. This number is calculated by subtracting the calculated fiscal year target for TSDs from the total fiscal year

target. It is reasonable to require generators to pay 81 percent of the fee target because it is very close to the historical distribution of fees. For example, in 2003 generators were responsible for 83 percent of all revenue collected (fee and tax). In 2004, generators paid 81.6 percent of the fees (no tax collection).

Steps 9 and 15. In steps 9 and 15, the MPCA divides the generator fiscal year target into a metropolitan and non-metropolitan area generator target. The proposed revisions will divide the generator fiscal year target in a 60/40 ratio, with 40 percent being paid by metropolitan area generators and 60 percent being collected from non-metropolitan area generators. This ratio is needed to remain in compliance with Minn. Stat. § 116.12, subd. 2(c), which directs the agency to "reduce fees charged to generators in counties which also charge generator fees to reflect a lesser level of activity by the agency in those counties." By assessing 40 percent of the target to the metropolitan area and 60 percent in the non-metropolitan area, the MPCA ensures smaller fees for those generators in the metropolitan area who also pay HW fees to the counties.

It is reasonable to assess 40 percent of generator fees to the metropolitan area and 60 percent to the non-metropolitan area because the distribution represents a fair and equitable balance between the inequities of the past system and the inequities created by using the existing formula to collect the fee and tax revenue.

In 2003, the metropolitan area generators paid close to 80 percent of the total tax revenue collected, and paid 54 percent of all revenue (fee and tax) paid to the state by generators. Fifty-four percent of the revenue combined with the \$1.3 million paid in fees paid to the host counties, add a large burden on the metropolitan area. In 2004, the opposite happened. When the MPCA used the existing fee structure to collect the full \$4,468,000; only 35 percent of the total revenue load was paid by metropolitan area generators with 65 percent being paid by the non-metropolitan generators.

It is needed and reasonable to find and maintain an equitable balance by having 40 percent of the fees be assessed to the metropolitan area generators, and to collect 60 percent from the non-metropolitan generators.

Step 10. For purposes of completing calculations in future steps, it is necessary to collect data on the total amount of waste, in pounds, generated by metropolitan area small and large quantity generators that are subject to a fee under this part. It is reasonable to get the information needed to execute the formula.

Step 11. For purposes of completing calculations in future steps, it is necessary to calculate the total number of metropolitan area generators that are subject to a fee under this part. It is reasonable to get the information needed to execute the formula.

Steps 12 and 18. These steps are used to calculate the base fee dollar target for the metropolitan area (step 12) and the non-metropolitan area (step 18). A base fee dollar target is the first step in the process of calculating an individual base fee; a fee that all generators will have to pay. It is reasonable to charge a base fee because it is a simple and effective calculation that can be used to

equally distribute a dedicated portion of the total dollar target across all generators. To determine the base fee dollar target for the metropolitan area, the dollar target (step 9) is multiplied by 0.52. The resulting value is the amount to be collected from metropolitan generators through the base fee. To determine the base fee dollar target for the non-metropolitan area; multiply the non-metropolitan area dollar target (step 15) by 0.53. The resulting value is the amount to be collected from non-metropolitan generators through the base fee. As previously stated, it is reasonable to do these calculations separately because it allows the formula to adequately address the differences between the metropolitan and non-metropolitan area; specifically, the base fee for the metropolitan area will be much smaller than the base fee in the non-metropolitan area. These values were chosen because they result in reasonable base fee levels, relative to recent years. In the metropolitan area, the average VSQG fee in 2004 was \$150, under these revisions that fee would have been \$175. In the non-metropolitan area, the 2004 VSQG fee was \$425, under these revisions that fee would have been \$400.

The base fee is necessary to ensure that the VSQG universe of generators is assessed a reasonable percentage of the overall generator fee target. If a per pound calculation was executed without a base fee, VSQGs would pay fees that do not represent the level of effort MPCA staff spend on VSQGs.

Steps 13 and 19. These steps are used to calculate the individual base for the metropolitan area (step 13) and the non-metropolitan area (step 19). To calculate the individual generator base fee, the dollars collected are divided by the number of generators. For the metropolitan area, this is dividing step 12 by step 11. For the non-metropolitan area, this is dividing step 18 by step 17. It is reasonable to charge a base fee because it is a simple and effective calculation that can be used to equally distribute a dedicated portion of the total dollar target across all generators. As previously stated, it is reasonable to do these calculations separately because it allows the formula to adequately address the differences between the metropolitan and non-metropolitan area generators.

Steps 14 and 20. These steps are used to calculate per pound quantity rate for the metropolitan area (step 14) and the non-metropolitan area (step 20). Step 14 and 20 are identical calculations, only the variables are different. The formula calculates the per pound quantity rates by dividing the number of dollars to be collected by the number of eligible pounds. It is reasonable to calculate the rate in this manner because it creates a fair and equitable rate to be charged evenly on each eligible pound of waste. As previously stated, it is reasonable to do these calculations separately because it allows the formula to adequately address the differences between the metropolitan and non-metropolitan area generators.

Step 16. For the purposes of completing calculations in future steps, it is necessary to collect data on the total amount of waste, in pounds, generated by non-metropolitan area small and large quantity generators that are subject to a fee under this part. It is reasonable to get the information needed to execute the formula.

Step 17. For purposes completing calculations in future steps, it is necessary to calculate the total number of non-metropolitan area generators that are subject to a fee under this part. It is reasonable to

get the information needed to execute the formula.

Subpart 2. Phase In Affects of Revised Fee Formula. This subpart was added in an effort to lessen the immediate impacts of the revised fee formula and to allow fee payers adequate time to assess and adapt operations in anyway that they find feasible. During the public comment process, agency staff was told that having time to prepare for a new system is very important. The proposed rule takes this into consideration by phasing in fee increases for the small number of generators whose fees will increase significantly as a result of these revisions. The proposed fee structure represents a shift or simplification in how we determine which wastes count towards fees. The MPCA has determined that the revised rule has benefits that outweigh any downside to this shifting, but that it is also reasonable to cap the increases caused by the revision until fee payers have had ample time to understand the new system, and possibly adapt operations.

Under this subpart, the MPCA will determine which fee payers were subject to a fee increase of 100 percent or a fee decrease of 25 percent, in the first year of implementation. The emphasis will be on determining which fees increased only as a result of the formula revisions, not due to regular business fluctuations or process changes.

Those generators whose fees would have increased by more than 100 percent will have their fee reduced to a 100 percent increase from the baseline fee that would have been generated under the existing system. The resulting shortfall will be collected by increasing fees for those generators whose fee would be reduced by 25 percent or more from the fee that would have been generated under the existing system. This fee increase will be in the form of a supplementary quantity fee that will be calculated and added to the original fee, to create the final fee. This adjustment will be done for the first four billing cycles of the revised fee system.

The affected generators fees will be capped at 200 percent of the baseline fee in the second year of implementation, 300 percent in the third and 400 percent in the fourth. This clarification is made to ensure that the generators who are impacted by this will see a linear fee increase rather than exponential growth over the allotted phasing time.

Only those generators that were eligible for an increase or a decrease in the first year of implementation will be eligible for that adjustment in years two and three. This subpart is reasonable because it eases pressure on some of the most affected fee payers while allowing the MPCA to continue to collect the full appropriated target.

7046.0065 Changes to Fee Formula

The modifications in this section states that any future revisions to the fee formula will be done through a formal rule revision. It is needed and reasonable to require a rule revision to adjust a formula that is established in a rule.

7046.0070 Notification of Error

The revisions in this part will change how a generator or facility can object to the fee that they are being charged. The current system requires that the fee payer submit notification to the MPCA and does not require them to submit payment until after the agency has determined whether or not the fee payers' objections are valid. The proposed system would require fee payers to make the payment as listed on the invoice or be subject to the late fees, any errors would then be reviewed and any overcharged amount would be refunded. This system is reasonable because it allows the agency to efficiently collect the appropriated fee dollars, while allowing the fee payers to object to the fee they were charged. This revision also sets a sixty-day deadline for the MPCA to make its determination. This is a reasonable deadline as it allows the MPCA ample time to respond to a large number of error notifications, while still giving fee payers an expectation of when the review will be completed. This system has been used by the MPCA's Air Quality Program, and has been proven to be an effective and reasonable system.

XIV. LIST OF AUTHORS, WITNESSES, AND APPENDICES

A. AUTHORS

The following MPCA staff participated in the development of this rulemaking.

1. Matt Herman, Municipal Division
2. Beverly Conerton, Attorney Generals Office
3. Melissa Wenzel, Customer Assistance Center
4. Kathy Gedde, Industrial Division
5. Myrna Halbach, Industrial Division
6. Nathan Cooley, Municipal Division
7. Mike Nelson, Small Business Ombudsman

B. WITNESSES

If these rules go to a public hearing, the MPCA anticipates having the following witnesses testify in support of the need for and reasonableness of the rules:

1. Mr. Matthew Herman, Planner Intermediate, Municipal Division. Mr. Herman is the principal author of the SONAR and will testify on the general need for and reasonableness of the proposed rules.
2. Myrna Halbach, Assistant Division Director, Industrial Division. Ms. Halbach is the manager directly overseeing this rulemaking and will testify on the general need for the proposed rules.
3. Beverley Conerton, Attorney Generals Office. Ms. Conerton is the Attorney representing the MPCA in this matter and will testify and answer questions related to the legal status of the rules and the rulemaking process.
4. Julie Rantala, Industrial Division. Ms. Rantala spent several years as the coordinator

of the HW fee structure. She will be available to answer questions on the implementation of the existing fee system.

5. Kathy Gedde, Industrial Division. Ms. Gedde is currently responsible for coordinating the HW fee system. She will be available to answer questions related to the implementation of the proposed fee system.

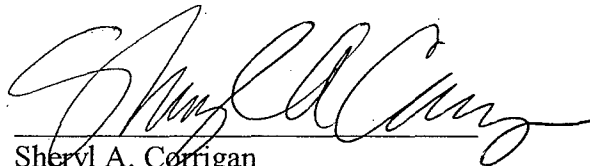
C. APPENDICES

1. Modeling calculators
2. SQG and LQG Modeling results
3. Mailings, Meeting Invitations, and Fact Sheets
4. Office of the Legislative Auditor Evaluation Report Summary: PE02-02a, Minnesota Pollution Control Agency Funding
5. Hazardous Waste Tax Payment Breakdown 1995-2003

XV. CONCLUSION

Based on the foregoing, the proposed rules are both needed and reasonable.

4/19/06
Date



Sheryl A. Corrigan
Commissioner



Appendix 1
Modeling Calculators

Non-metropolitan and Metropolitan Area Modeling Calculators February 2006

Non-Metropolitan Area Modeling Calculator

Metro Portion	40%
Non-Metro Portion	60%
Base Fee Percent	53%
Metro Area SQG and LQG Pounds Generated	14,408,020
Scenario Dollar Target	2,171,448
VSQG Base Rate	400
VSQG Base Fees	997,600
SQG Base Fee Factor	1.0
SQG Base Fees	119,000
LQG Base Fee Factor	1.0
LQG Base Fees	22,800
Base Fee Payments	1,156,402
Quantity Rate Dollars	1,015,046
Per Pound Quantity Rate	.070450
Metro Pays	1,447,632
NonMetro Pays	2,171,448
Total Paid	3,619,080
Pounds generated	generator fee
2640	585.99
15,000	1,456.75
26,400	2,259.88
50,000	3,922.50
100,000	7,445.01
500,000	35,625.03
1,000,000	70,850.07

Non-Metropolitan Area Modeling Data Used

	VSQG	SQG	LQG	Total Lbs (SQG & LQG)	Qty Cap
Totals	2494	340	57	14,408,020	1,000,000
Target Dollar Amount		3,619,080			
40/60 Metro/NonMetro		2,171,448			

Metropolitan Area Modeling Calculator

Metro Portion	40%
Non-Metro Portion	60%
Base Fee Percent	52%
Metro Area SQG and LQG Pounds Generated	46,411,574
Scenario Dollar Target	1,447,632
VSQG Base Rate	175
VSQG Base Fees	609,350
SQG Base Fee Factor	1.0
SQG Base Fees	107,100
LQG Base Fee Factor	1.0
LQG Base Fees	31,325
Base Fee Payments	747,777
Quantity Rate Dollars	699,855
Per Pound Quantity Rate	.015079
Metro Pays	1,447,632
NonMetro Pays	2,171,448
Total Paid	3,619,080
Pounds generated	metro generator fee
2640	214.81
15,000	401.19
26,400	573.09
50,000	928.97
100,000	1,682.93
500,000	7,714.66
1,000,000	15,254.32
2,000,000	30,333.64

Metropolitan Area Modeling Data Used

	VSQG	SQG	LQG	Total Lbs (SQG & LQG)	Qty Cap
Totals	3482	612	179	37,164,818	2,000,000
Generator Target Dollar Amount		3,619,080			
40/60 Metro/NonMetro		1,447,632			

Appendix 2
SQG and LQG Modeling Results

Non-metropolitan and Metropolitan Area SQG and LQG Modeling Results

February 2006

**The modeling data contained in this document is based on the data used to generate fee invoices for wastes generated in 2004. The predicted fee shows what the generator's fees would have been had the proposed formula been used to calculate the 2004 bills.*

Non-Metropolitan Area SQG and LQG Fee Modeling Results

Company Name	2004 Fee Amount	Cap Adjusted Pounds	Predicted Fee	(+/-)
3M - Alexandria Abrasives Systems Div	\$16,983.32	92,883	\$11,587.76	-31.77%
3M - Electrical Products Div - New Ulm	\$11,592.60	36,954	\$4,851.11	-58.15%
3M - Hutchinson	\$183,089.14	1,000,000	\$120,850.00	-33.99%
3M - Industrial Specialities Fairmont	\$2,387.73	5,048	\$1,008.03	-57.78%
ABC Bus Inc	\$1,097.37	4,640	\$958.89	-12.62%
ADM Corn Processing - Marshall	\$2,750.33	17,629	\$2,523.41	-8.25%
AGCO Corp Jackson Operations	\$6,496.99	234,612	\$12,993.98	100.00%
Aim Auto & Body Parts Inc	\$2,147.42	6,160	\$1,141.97	-46.82%
Aitkin Body Shop Inc	\$1,253.45	3,750	\$851.69	-32.05%
AJM Painting Inc	\$1,560.90	3,300	\$797.49	-48.91%
Alamco Wood Products Inc	\$4,446.37	100,060	\$7,449.23	67.54%
Albert Lea Electro Plating Inc	\$7,293.07	72,950	\$5,539.33	-24.05%
Alexandria Technical College	\$1,918.02	4,220	\$908.30	-52.64%
All Flex Inc	\$7,377.03	9,810	\$1,581.61	-78.56%
Allina Health System - Buffalo Hospital	\$1,895.02	4,016	\$883.70	-53.37%
Allina Medical Clinic Annandale	\$1,324.40	2,800	\$737.26	-44.33%
Almco Inc - Plant	\$1,690.98	4,400	\$929.98	-45.00%
Altec HiLine LLC	\$863.23	3,650	\$657.14	-23.87%
Alumacraft Boat Co	\$4,089.45	22,749	\$3,140.12	-23.21%
Amcon Block & Precast Inc - St Cloud	\$1,821.05	5,250	\$1,032.36	-43.31%
Anderson Koch Ford	\$1,182.50	5,000	\$1,002.25	-15.24%
Anodize Inc - Buffalo	\$2,882.35	18,150	\$2,586.17	-10.28%
Archer Daniels Midland Co Mankato	\$1,738.72	13,902	\$1,379.40	-20.67%
Arctic Cat Inc	\$1,344.98	5,687	\$1,085.00	-19.33%
Arrow Tank & Engineering Co - Cambridge	\$5,448.56	42,000	\$5,458.90	0.19%
Arrowhead Auto Body	\$1,324.40	2,800	\$737.26	-44.33%
Associated Finishing Inc	\$3,094.37	6,542	\$1,187.98	-61.61%
ASV Inc - Grand Rapids	\$3,559.33	10,030	\$1,608.11	-54.82%
Austin Medical Center	\$2,201.82	13,810	\$2,063.41	-6.29%
Auto Import Inc	\$756.80	3,200	\$625.44	-17.36%
Aztec Electronics Inc - St Michael	\$1,623.28	15,455	\$1,488.80	-8.28%

Company Name	2004 Fee Amount	Cap Adjusted Pounds	Predicted Fee	(+/-)
B Gunderson Motors Inc	\$1,324.40	2,800	\$737.26	-44.33%
Badger Foundry Co	\$1,352.78	2,860	\$744.49	-44.97%
Balzer Inc-South Bldg	\$2,453.70	15,250	\$2,236.86	-8.84%
Bang Printing Inc	\$2,720.24	6,427	\$1,174.13	-56.84%
Banta Publications Long Prairie	\$1,577.04	9,370	\$1,528.62	-3.07%
Barnesville Area Clinic	\$2,814.35	9,350	\$1,526.21	-45.77%
Bauerly Companies - Sauk Rapids	\$1,642.50	14,580	\$1,427.16	-13.11%
Bayer Built Woodworks Inc	\$2,459.60	8,800	\$1,459.96	-40.64%
Behrens Inc - 471	\$2,291.69	7,170	\$1,263.63	-44.86%
Bemidji Aviation Services Inc - Site B	\$1,300.75	2,750	\$731.24	-43.78%
Benchmark Electronics - Winona Div	\$3,384.20	7,060	\$1,250.38	-63.05%
Bergquist Co - Big Fork	\$2,294.06	14,800	\$2,182.66	-4.86%
Bergquist Co Sil Pad Division	\$12,782.54	337,360	\$25,565.08	100.00%
Best Oil Co	\$1,573.92	6,700	\$1,207.02	-23.31%
Blandin Paper Co	\$1,076.59	3,951	\$875.90	-18.64%
Blount Inc - Owatonna	\$1,411.62	9,835	\$1,092.88	-22.58%
Bondhus Corp	\$1,803.56	4,083	\$891.80	-50.55%
Brenton Engineering Co	\$1,034.10	4,760	\$973.34	-5.88%
Buffalo Dry Cleaners & Launderers Inc	\$1,294.84	9,000	\$1,034.05	-20.14%
Cambria Co	\$832.48	3,520	\$647.98	-22.16%
Camelot Cleaners - Moorhead	\$1,312.58	2,775	\$734.25	-44.06%
Camp Ripley - CSMS	\$2,492.25	5,669	\$1,082.83	-56.55%
Cannon Equipment Co	\$9,109.72	136,757	\$10,034.53	10.15%
Carleton College	\$1,864.81	5,440	\$1,055.25	-43.41%
Carlson Craft Commercial	\$666.22	2,817	\$598.46	-10.17%
Carlson Craft Social	\$1,104.04	5,419	\$1,052.72	-4.65%
Carrows Marshall Cleaners	\$1,984.24	4,780	\$975.75	-50.82%
Central Lakes College	\$3,519.60	7,441	\$1,296.27	-63.17%
Central Lakes College - Airport Rd	\$1,712.26	3,620	\$836.03	-51.17%
Central Marble Products Inc	\$903.91	3,822	\$860.36	-4.82%
Central Research Lab	\$2,849.83	12,100	\$1,857.45	-34.82%
Chassis Liner Corp	\$3,050.85	6,450	\$1,176.90	-61.42%
Christian Bros Cabinets Inc	\$993.30	4,800	\$978.16	-1.52%
Christianson Systems Inc	\$2,134.42	6,050	\$1,128.72	-47.12%
CHS Oilseed Processing - Mankato - HW	\$1,203.19	7,450	\$924.85	-23.13%
Church Offset Printing Inc	\$1,002.17	4,950	\$996.23	-0.59%
Cirrus Design Corp	\$7,190.19	74,440	\$5,644.30	-21.50%
Clements Auto Co	\$1,234.54	5,220	\$1,028.75	-16.67%
Clements Chevrolet Cadillac Co	\$697.68	2,950	\$607.83	-12.88%
CNH America LLC	\$760.12	3,214	\$626.43	-17.59%
Cold Spring Granite Co	\$4,215.02	17,390	\$2,494.63	-40.82%
Cold Spring Granite Co - Cold Spring	\$3,404.43	11,570	\$1,793.61	-47.32%
College of St Benedict	\$1,432.36	3,652	\$839.88	-41.36%
Como Lube & Supplies Inc - Duluth	\$1,985.42	21,580	\$1,920.31	-3.28%
Concrete Pump Repair	\$1,998.43	17,000	\$1,597.65	-20.05%
Continental Bridge Inc	\$2,719.75	11,000	\$1,724.95	-36.58%

Company Name	2004 Fee Amount	Cap Adjusted Pounds	Predicted Fee	(+/-)
Corchran Inc	\$808.83	3,420	\$640.94	-20.76%
Cortec Advanced Film Division	\$1,034.69	5,500	\$787.48	-23.89%
Cosmos Enterprises Inc	\$773.36	3,270	\$630.37	-18.49%
Crenlo LLC - Plant 2	\$9,615.75	346,890	\$19,231.50	100.00%
Crestliner Boats Inc	\$1,119.70	6,074	\$1,131.61	1.06%
Crow River Press Inc	\$1,333.86	2,820	\$739.67	-44.55%
Crown Beverage Packaging USA	\$1,977.74	9,900	\$1,592.46	-19.48%
Crown Cork & Seal Faribault	\$8,462.81	55,566	\$7,092.92	-16.19%
Crystal Cabinet Works Inc	\$6,043.24	340,023	\$12,086.48	100.00%
Crystal Cabinet Works Inc - Sauk Rapids	\$2,333.97	27,675	\$2,349.70	0.67%
Crysteel Manufacturing Inc	\$2,246.75	7,000	\$1,243.15	-44.67%
Crysteel Truck Equipment Inc	\$2,481.77	33,550	\$2,763.60	11.36%
Custom Eyes Inc	\$792.28	3,350	\$636.01	-19.72%
Custom Products of Litchfield Inc	\$2,443.00	16,599	\$2,399.35	-1.79%
Cytec Engineered Materials Inc	\$11,052.79	261,773	\$18,841.91	70.47%
Dave Syverson Truck Body Shop	\$636.19	2,690	\$589.51	-7.34%
Davies Printing Co	\$2,076.47	22,200	\$1,963.99	-5.42%
DCI Inc	\$1,797.41	6,300	\$1,158.84	-35.53%
DCM Tech Corp	\$1,933.39	4,350	\$923.96	-52.21%
Dee Independent Cleaners	\$963.15	4,290	\$916.73	-4.82%
Dentim dba Etchit	\$1,912.70	8,800	\$1,459.96	-23.67%
Derby Four Wheel Drive Inc	\$947.77	4,030	\$885.41	-6.58%
Dison's Cleaners	\$1,233.35	5,860	\$1,105.84	-10.34%
Dittrich Specialities	\$1,278.99	2,704	\$725.70	-43.26%
DJV Enterprise Inc - Waite Park	\$2,044.79	4,323	\$920.71	-54.97%
DMIR Railway - Two Harbors Dock	\$1,541.99	6,520	\$1,185.33	-23.13%
DMIR Railway Co - Proctor Yard	\$3,610.42	14,763	\$2,178.20	-39.67%
Domaille Collision Center	\$1,067.21	6,050	\$826.22	-22.58%
Dom-Ex Inc Brooklyn Warehouse	\$1,873.08	3,960	\$876.98	-53.18%
Douglas Machine Inc	\$5,788.34	377,240	\$11,576.68	100.00%
DS Manufacturing Inc	\$2,423.15	31,567	\$2,623.90	8.28%
DuFour's Cleaners Inc	\$1,330.32	9,150	\$1,044.62	-21.48%
Dura Supreme	\$4,189.01	91,300	\$6,832.09	63.10%
East Side Oil Co St Cloud	\$3,044.95	11,000	\$1,724.95	-43.35%
ECM Publishers Inc Web Printing	\$674.98	2,854	\$601.06	-10.95%
Electrolux Home Products North America	\$1,170.68	4,200	\$905.89	-22.62%
Elk River Machine Co	\$2,535.29	6,870	\$1,227.49	-51.58%
Emerson Network Power Connectivity Solut	\$2,993.62	6,329	\$1,162.33	-61.17%
Energy Economics Inc	\$2,524.65	7,975	\$1,360.59	-46.11%
Engineered Polymers Corp	\$1,977.73	21,450	\$1,911.15	-3.37%
Equipment Coating Inc	\$2,246.75	4,750	\$972.14	-56.73%
ER Systems	\$1,669.69	3,530	\$825.19	-50.58%
Erickson Truck Sales Salvage	\$816.17	3,451	\$643.12	-21.20%
Essilor Coating Center	\$3,263.12	28,790	\$3,867.76	18.53%
Ethanol 2000 LLP	\$2,487.39	11,030	\$1,728.56	-30.51%
Falk Auto Body	\$1,939.30	4,400	\$929.98	-52.05%

Company Name	2004 Fee Amount	Cap Adjusted Pounds	Predicted Fee	(+/-)
Featherlite Graphics	\$2,307.53	15,028	\$2,210.12	-4.22%
Federal Correctional Institution	\$2,081.20	4,400	\$929.98	-55.32%
Finishing Touch Industries Inc	\$2,548.29	9,550	\$1,550.30	-39.16%
Flatwater Fleet Inc	\$886.88	3,750	\$851.69	-3.97%
Flowers Collision Repair Center Inc	\$1,300.75	2,750	\$731.24	-43.78%
Foldcraft Co	\$3,736.71	16,850	\$2,429.58	-34.98%
Former Long Prairie Cleaners Site	\$3,133.63	14,500	\$2,146.53	-31.50%
Gemini Inc	\$792.28	3,350	\$636.01	-19.72%
General Safety Equipment Corp	\$3,381.95	7,150	\$1,261.22	-62.71%
Goebel Fixture Co	\$1,133.55	7,172	\$905.27	-20.14%
Goldenwood Cabinetry Inc	\$1,821.05	3,850	\$863.73	-52.57%
Gorfol Manufacturing	\$1,485.76	3,221	\$787.97	-46.97%
Grand Itasca Clinic & Hospital	\$2,435.95	6,350	\$1,164.86	-52.18%
Graphic Packaging International Inc	\$1,767.85	11,900	\$1,833.36	3.71%
Great River Energy of Elk River	\$10,961.91	11,425	\$1,840.77	-83.21%
Great River Energy-Pleasant Valley Stat	\$2,763.04	8,108	\$1,376.61	-50.18%
Grede St Cloud Inc	\$1,892.00	4,000	\$881.80	-53.39%
Greg Larson Sports Graphics	\$1,178.96	7,940	\$959.37	-18.63%
Hal Leonard Publishing Co	\$2,072.33	8,950	\$1,478.03	-28.68%
Halcon Corp	\$2,237.88	25,850	\$2,221.13	-0.75%
Hallberg Marine Inc	\$1,461.57	3,090	\$772.19	-47.17%
Heintz Pontiac Cadillac Toyota Inc	\$942.69	3,803	\$858.07	-8.98%
Hibbing Taconite Co	\$2,263.31	6,710	\$1,208.22	-46.62%
Hiniker Co - Mankato	\$1,052.43	4,450	\$936.00	-11.06%
Hoffco Inc	\$1,702.80	3,600	\$833.62	-51.04%
Homecrest Industries	\$2,511.63	9,240	\$1,512.96	-39.76%
Hour Glass Cleaners - St Cloud	\$1,197.58	8,255	\$981.56	-18.04%
HSI Metal Stamping	\$1,787.94	3,780	\$855.30	-52.16%
Hutchinson Manufacturing Inc	\$2,064.47	20,217	\$1,824.29	-11.63%
Hutchinson Technology Inc	\$26,995.58	1,000,000	\$53,991.16	100.00%
IBM Rochester	\$8,175.54	268,843	\$16,351.08	100.00%
Impact Innovations Inc	\$1,028.01	4,385	\$928.17	-9.71%
Industrial Finishing Inc	\$5,904.00	16,673	\$2,408.26	-59.21%
Industrial Finishing Services Deer Creek	\$2,069.38	5,500	\$1,062.48	-48.66%
Industrial Finishing Services Inc	\$2,891.22	9,450	\$1,538.25	-46.80%
Inland Steel Mining Co Minorca	\$1,531.11	7,065	\$1,250.98	-18.30%
Innovex Inc	\$25,258.28	817,189	\$50,516.56	100.00%
Interstate Detroit Diesel	\$2,538.24	7,830	\$1,343.12	-47.08%
Irathane Systems Inc	\$1,576.62	7,598	\$1,315.18	-16.58%
ITRON Inc	\$2,516.72	6,693	\$1,206.17	-52.07%
J-Craft	\$1,229.80	8,800	\$1,019.96	-17.06%
Jeff's Auto Body Inc	\$2,256.21	7,080	\$1,252.79	-44.47%
Jenkins Sandblasting & Painting	\$3,244.78	15,110	\$2,220.00	-31.58%
Jet Edge	\$2,557.75	5,430	\$1,054.04	-58.79%
JMJ Transmission Inc	\$877.42	3,710	\$661.37	-24.62%
Johnson Printing Co	\$2,350.81	5,630	\$1,078.13	-54.14%

Company Name	2004 Fee Amount	Cap Adjusted Pounds	Predicted Fee	(+/-)
Jones Metal Products Inc	\$2,017.15	11,550	\$1,791.20	-11.20%
Jostens Inc - Red Wing	\$4,633.75	9,807	\$1,581.25	-65.88%
K & G Manufacturing Co	\$2,093.62	11,410	\$1,774.33	-15.25%
Kato Engineering - North Mankato	\$2,713.13	9,052	\$1,490.31	-45.07%
Kennedy Transmission - Elk River	\$1,258.18	2,660	\$720.40	-42.74%
Kennedy Transmission - Waite Park	\$1,272.37	2,690	\$724.01	-43.10%
Keystone Automotive Industries MN Inc	\$4,830.24	326,088	\$9,660.48	100.00%
Kohls-Weelborg Ford-Lincoln-Mercury Inc	\$1,340.96	3,195	\$784.84	-41.47%
Kolar Chevrolet Pontiac Buick Olds GEO I	\$1,339.78	6,040	\$1,127.52	-15.84%
Komo Machine Inc	\$811.43	3,431	\$641.71	-20.92%
L & M Radiator Inc	\$1,692.52	8,244	\$1,392.99	-17.70%
Lakeland Inc	\$1,206.74	8,270	\$982.62	-18.57%
Lakeland Manufacturing	\$1,990.15	4,830	\$981.77	-50.67%
Lakewood Health System	\$1,202.84	3,323	\$800.26	-33.47%
Landscape Structures Inc	\$6,066.23	42,400	\$5,507.08	-9.22%
Langer Equipment Co	\$1,594.01	3,370	\$805.92	-49.44%
Larson Glastron Boats Inc	\$8,051.65	32,893	\$4,361.96	-45.83%
Le Sueur Inc	\$2,897.13	9,200	\$1,508.14	-47.94%
Lemco Hydraulics	\$1,381.16	2,920	\$751.71	-45.57%
Leustek Construction	\$1,329.13	2,810	\$738.46	-44.44%
Little Falls Machine Inc	\$969.65	4,400	\$929.98	-4.09%
Lonsdale Painting	\$1,489.96	8,250	\$1,393.71	-6.46%
Lou Rich Inc - Albert Lea	\$3,207.53	14,850	\$2,188.68	-31.76%
Lowth Bob Ford Inc	\$2,660.63	7,500	\$1,303.38	-51.01%
Lund Boat Co	\$23,117.94	296,642	\$21,298.43	-7.87%
Mac Manufacturing Inc	\$752.08	2,880	\$602.90	-19.84%
Malco Products Inc	\$964.93	4,080	\$891.44	-7.62%
Maney International of Duluth Inc	\$1,144.67	4,930	\$993.82	-13.18%
Marksman Metals Co	\$5,229.62	44,200	\$5,723.89	9.45%
Marvin Windows	\$5,352.44	5,790	\$1,097.41	-79.50%
Mathiowetz Construction Co	\$820.66	2,820	\$739.67	-9.87%
Mayo Foundation/St Mary's Hospital	\$3,775.15	14,375	\$2,131.47	-43.54%
Mayo Recycling Center	\$4,296.62	11,150	\$1,743.02	-59.43%
MCF - Willow River/Moose Lake	\$948.37	3,075	\$770.38	-18.77%
McLaughlin & Schulz Inc	\$695.31	2,940	\$607.12	-12.68%
McNeilus Steel Inc	\$1,324.40	2,800	\$737.26	-44.33%
McNeilus Truck & Manufacturing Inc	\$8,027.70	372,800	\$16,055.40	100.00%
McNeilus Truck & Mfg Composites Facility	\$2,293.47	23,130	\$2,029.51	-11.51%
Melrose Dairy Proteins LLC	\$1,926.30	4,290	\$916.73	-52.41%
Merit Enterprises Inc	\$4,003.48	634,468	\$8,006.96	100.00%
Merrill Corporation St Cloud	\$1,566.82	7,000	\$1,243.15	-20.66%
MG Waldbaum Co	\$1,419.00	3,000	\$761.35	-46.35%
MHC Fabrication Division	\$1,750.10	7,700	\$1,327.47	-24.15%
MICO Inc	\$2,404.03	19,645	\$2,766.24	15.07%
Midwest Fire Equipment Rep Co	\$1,962.95	4,150	\$899.87	-54.16%
Midwest Truck & Parts Inc	\$674.03	2,850	\$600.78	-10.87%

Company Name	2004 Fee Amount	Cap Adjusted Pounds	Predicted Fee	(+/-)
Mikes Broadway Body Shop	\$1,518.33	3,210	\$786.64	-48.19%
Millerbernd Manufacturing Co - Plant 2	\$650.38	2,750	\$593.74	-8.71%
Mills Automotive Inc	\$946.00	4,000	\$881.80	-6.79%
Minn Correctional Facility - Faribault	\$1,075.61	3,409	\$810.61	-24.64%
Minnesota Energy	\$1,799.77	7,610	\$1,316.62	-26.84%
Minnesota Motor Co	\$910.53	3,850	\$863.73	-5.14%
Minnesota Power Inc - Boswell Energy Ctr	\$2,377.17	5,018	\$1,004.42	-57.75%
Minnesota State University Mankato	\$3,857.57	9,336	\$1,524.52	-60.48%
Minnesota Valley Testing Labs Inc	\$6,663.86	19,547	\$2,754.44	-58.67%
MN Correctional Facility - St Cloud	\$736.02	3,112	\$619.24	-15.87%
MNDNR FOS Grand Rapids	\$1,026.41	3,910	\$870.96	-15.15%
MNDOT District 6B Owatonna	\$1,288.93	2,725	\$728.23	-43.50%
Motor Inn Co	\$1,206.16	5,100	\$1,014.30	-15.91%
Mountain Power Hydraulics	\$1,262.91	2,670	\$721.60	-42.86%
MTD Acquisition Inc	\$21,049.63	163,924	\$20,144.65	-4.30%
Multek Flexible Circuits Inc-Highway 3	\$25,104.56	1,000,000	\$50,209.12	100.00%
Nahan Printing Inc	\$3,701.23	74,800	\$5,669.66	53.18%
National Coatings Restoration Inc	\$1,631.85	10,800	\$1,700.86	4.23%
Nelson International Division	\$1,352.78	6,670	\$1,203.40	-11.04%
New Dimension Plating Inc	\$779.98	3,138	\$621.07	-20.37%
New Flyer of America Inc	\$3,109.98	14,300	\$2,122.44	-31.75%
New Flyer USA Inc	\$9,049.13	114,822	\$8,489.21	-6.19%
New Life Communications Inc Print House	\$1,905.01	4,110	\$895.05	-53.02%
Noble Industries Ltd	\$34,104.96	833,526	\$59,121.91	73.35%
Norcraft Companies LLC	\$1,995.47	21,750	\$1,932.29	-3.17%
Northeast Technical Services	\$1,915.65	4,200	\$905.89	-52.71%
Northern Engraving Corp	\$4,722.26	44,258	\$5,730.88	21.36%
Northern Natural Gas - North Branch	\$1,489.95	3,150	\$779.42	-47.69%
Northland Community & Technical College	\$771.00	3,260	\$629.67	-18.33%
Northland Fishing Tackle Inc	\$1,806.86	3,820	\$860.12	-52.40%
Northland Machine Inc	\$1,811.59	3,830	\$861.32	-52.45%
Northshore Mining Co	\$9,684.00	51,182	\$6,564.87	-32.21%
Northshore Mining Co - Babbitt	\$2,269.81	22,610	\$1,992.87	-12.20%
Northstar Aerospace	\$2,169.66	4,887	\$988.64	-54.43%
Northwest Airlines Inc - Duluth	\$5,365.76	16,775	\$2,420.55	-54.89%
Norwood Promotional Products Inc	\$4,459.80	72,132	\$5,481.70	22.91%
Norwood Promotional Products Inc - RW	\$8,295.84	17,780	\$2,541.60	-69.36%
Nyhus Chevrolet Buick Inc	\$700.04	2,960	\$608.53	-13.07%
Ogden Newspapers Inc dba House of Print	\$2,800.16	5,920	\$1,113.06	-60.25%
OlymPak	\$1,584.55	11,500	\$1,210.18	-23.63%
Page & Hilll Forest Products Inc	\$1,570.37	4,990	\$1,001.05	-36.25%
Palm Manufacturing & Sales	\$1,300.23	2,749	\$731.11	-43.77%
Palmer Auto Supply Inc	\$1,045.33	4,360	\$925.16	-11.50%
Palmer Industries	\$1,305.48	2,760	\$732.44	-43.89%
Paragon Store Fixtures	\$2,199.45	6,600	\$1,194.97	-45.67%
Park Press Quality Printing	\$1,726.45	3,650	\$839.64	-51.37%

Company Name	2004 Fee Amount	Cap Adjusted Pounds	Predicted Fee	(+/-%)
Parker Hannifin Corphose Products Div	\$5,395.17	35,150	\$4,633.82	-14.11%
Pearson NCS - Owatonna	\$1,167.72	7,300	\$914.29	-21.70%
Penda Glasstite Inc	\$3,893.39	35,100	\$4,627.80	18.86%
Performance Plating Ltd	\$2,718.60	41,561	\$3,327.97	22.41%
Peterbilt of Winona	\$648.01	2,740	\$593.03	-8.48%
Phoenix Industries of Crookston Ltd	\$1,123.38	7,000	\$893.15	-20.49%
Plastech Corp Rush City	\$1,298.39	2,745	\$730.64	-43.73%
Plato Woodwork Inc	\$6,714.24	68,120	\$5,199.05	-22.57%
Polar Tank Trailer	\$1,300.75	10,000	\$1,104.50	-15.09%
Polaris Industries Inc - Roseau	\$7,273.27	74,280	\$5,633.03	-22.55%
Precision Press	\$3,892.26	29,726	\$3,980.50	2.27%
Prefinishing Specialists Inc	\$1,750.10	17,600	\$1,639.92	-6.30%
Prestige Plating & Coating Inc	\$5,463.15	42,000	\$5,458.90	-0.08%
Puzzlecraft Inc Jonticraft Inc	\$1,067.21	6,050	\$826.22	-22.58%
Quality Circuits	\$12,040.34	364,576	\$24,080.68	100.00%
Quebecor World St Cloud Inc	\$4,280.66	45,100	\$3,577.30	-16.43%
Rapat Corp	\$975.57	4,500	\$942.03	-3.44%
Rapid Plating Inc	\$4,221.53	13,200	\$1,989.94	-52.86%
RC Fabricators Inc	\$3,352.40	12,450	\$1,899.60	-43.34%
RC Machining Co Inc	\$1,037.06	5,540	\$790.29	-23.79%
Red Wing Shoe Co - Plant 2	\$2,307.07	9,755	\$1,574.99	-31.73%
Redball LLC - Hall Ave	\$1,520.10	12,090	\$1,251.74	-17.65%
Red's Auto Electric West	\$1,348.05	2,850	\$743.28	-44.86%
Remmele Engineering Inc Plant 30	\$4,898.51	32,450	\$4,308.60	-12.04%
Rengel Printing Co Inc	\$1,300.75	2,750	\$731.24	-43.78%
RIE Coatings	\$1,300.76	5,500	\$1,062.48	-18.32%
Riverside Electronics Ltd	\$4,734.45	16,343	\$2,368.51	-49.97%
RiverStar Inc	\$1,563.32	8,461	\$1,419.13	-9.22%
Riviera Cabinets	\$1,359.88	11,000	\$1,174.95	-13.60%
RM Johnson Co Inc - Annandale	\$1,025.58	4,503	\$942.39	-8.11%
Rochester Ford Body Shop	\$910.53	3,850	\$863.73	-5.14%
Rochester Ground Water Plume	\$2,341.35	4,950	\$996.23	-57.45%
Rochester Medical Corp - Site 1	\$4,648.71	35,750	\$4,706.09	1.23%
Rochester Medical Corp - Site 2	\$10,559.73	679,800	\$21,119.46	100.00%
Ron's Body Shop Inc	\$1,395.35	2,950	\$755.33	-45.87%
Rossi Auto Body Inc	\$640.92	2,710	\$590.92	-7.80%
RTP Co	\$2,370.69	7,287	\$1,277.72	-46.10%
Sappi Cloquet LLC	\$3,267.03	11,575	\$1,794.21	-45.08%
Sartell Water Controls Inc	\$2,283.42	12,343	\$1,886.65	-17.38%
Sauk Centre Web Printing	\$1,624.76	3,050	\$767.37	-52.77%
Savamco Manufacturing Inc	\$760.07	3,214	\$626.41	-17.58%
Saxon	\$2,778.88	26,000	\$2,231.70	-19.69%
SB Foot Tanning Co -	\$3,832.73	7,956	\$1,358.30	-64.56%
SB Foot Tanning Co - Finishing Plant	\$963.27	4,073	\$890.59	-7.54%
Schell Brewing Co	\$3,547.50	18,000	\$2,568.10	-27.61%
Schmidt Printing Inc - Byron	\$2,996.46	24,970	\$3,407.64	13.72%

Company Name	2004 Fee Amount	Cap Adjusted Pounds	Predicted Fee	(%)
Sellner Manufacturing Co	\$2,004.34	4,950	\$996.23	-50.30%
Sentinel Printing Co Inc	\$1,951.14	8,250	\$1,393.71	-28.57%
Sil-Pro	\$1,821.05	3,850	\$863.73	-52.57%
SJF Material Handling Inc	\$1,537.25	4,500	\$942.03	-38.72%
SL - Montevideo Techology Inc	\$4,747.17	17,035	\$2,451.87	-48.35%
SM Enterprises Inc	\$1,300.75	2,750	\$731.24	-43.78%
Smyth Companies Inc - Austin	\$1,164.77	7,700	\$942.47	-19.09%
Solvay Pharmaceuticals	\$2,724.50	5,760	\$1,093.79	-59.85%
Southern Minnesota Beet Sugar Coop	\$3,398.27	11,746	\$1,814.81	-46.60%
Southtown Inc	\$2,010.25	5,000	\$1,002.25	-50.14%
Specialty Systems Manufacturing	\$1,806.27	5,950	\$1,116.68	-38.18%
Spectralytics	\$2,000.79	4,530	\$945.64	-52.74%
Spectrum Metal Finishing Inc	\$3,320.24	14,039	\$2,091.00	-37.02%
Spring Grove Collision Center	\$969.65	3,300	\$797.49	-17.76%
Springfield Medical Center Hospital	\$1,329.13	2,810	\$738.46	-44.44%
St Cloud Engraving Inc	\$1,628.90	7,600	\$1,315.42	-19.24%
St Cloud Medical Group PA	\$1,655.50	3,500	\$821.58	-50.37%
St Cloud Truck Sales Inc	\$1,854.16	3,920	\$872.16	-52.96%
S-T Industries Inc	\$1,537.26	6,500	\$1,182.93	-23.05%
St Joseph's Medical Center	\$1,824.21	3,815	\$859.52	-52.88%
St Lukes Hospital & Regional Trauma Ct	\$3,010.66	6,337	\$1,163.29	-61.36%
St Mary's Duluth Clinic Health System	\$8,576.32	51,446	\$6,596.72	-23.08%
Stearns Manufacturing Co	\$1,527.79	3,230	\$789.05	-48.35%
Steinbrecher Painting Inc	\$2,524.64	9,350	\$1,526.21	-39.55%
Stone Products of St Cloud Inc	\$1,063.72	5,991	\$822.07	-22.72%
Stora Enso - Duluth Paper Mill	\$4,274.27	20,468	\$2,865.37	-32.96%
Streater Inc	\$5,000.38	101,806	\$7,572.23	51.43%
Strongwell - Chatfield Division	\$7,228.83	66,483	\$8,407.88	16.31%
Sun Patio Inc	\$1,315.53	10,250	\$1,122.11	-14.70%
Sunrise Fiberglass Corp - Wyoming	\$4,865.99	17,600	\$2,519.92	-48.21%
Superior Industries LLC	\$2,329.53	7,700	\$1,327.47	-43.02%
Swanson & Youngdale Inc - Rochester	\$922.35	3,900	\$869.76	-5.70%
TE Ibberson Co	\$2,521.09	6,290	\$1,157.63	-54.08%
TEAM Industries - Bagley	\$716.60	3,030	\$613.46	-14.39%
Technical Services Electronics - Jackson	\$1,639.54	15,020	\$1,458.16	-11.06%
Telex Communications Inc Glencoe	\$1,765.48	7,065	\$1,250.98	-29.14%
TESCOM - Industrial Controls Division	\$650.38	2,750	\$593.74	-8.71%
The Wood Shop of Avon Inc	\$650.38	2,750	\$593.74	-8.71%
Thern Inc	\$1,715.58	10,029	\$1,607.99	-6.27%
Thin Film Technology Corp	\$11,748.77	66,605	\$8,422.57	-28.31%
Timber Wholesalers Inc	\$1,909.74	4,150	\$899.87	-52.88%
Titan Machinery	\$2,061.69	7,470	\$1,299.76	-36.96%
Towmaster Inc	\$1,805.03	14,938	\$1,452.38	-19.54%
Trus Joist A Weyerhaeuser Business	\$1,726.45	3,650	\$839.64	-51.37%
Truth Hardware Corp - Owatonna	\$866.78	3,665	\$658.20	-24.06%
Truth Hardware Paint Plant - Owatonna	\$3,218.89	31,499	\$2,619.10	-18.63%

Company Name	2004 Fee Amount	Cap Adjusted Pounds	Predicted Fee	(+/-%)
TRW - Rushford	\$1,348.05	2,850	\$743.28	-44.86%
TRW Automotive Electronics Body Control	\$3,098.51	8,646	\$1,441.41	-53.48%
Tuohy Furniture Corp	\$1,295.43	9,490	\$1,068.57	-17.51%
Tuohy Furniture Corp Plant 3	\$1,262.32	9,350	\$1,058.71	-16.13%
Tuohy Furniture Corp Plant 5	\$1,002.17	4,950	\$996.23	-0.59%
TW Painting & Prefinishing	\$3,405.60	10,800	\$1,700.86	-50.06%
TWF Industries	\$1,169.50	7,720	\$943.87	-19.29%
TWF Industries Inc - Alexandria	\$2,047.50	22,570	\$1,990.06	-2.81%
TWF Industries Inc Barrett	\$2,054.60	22,600	\$1,992.17	-3.04%
U of M - Duluth Campus	\$3,022.18	8,091	\$1,374.52	-54.52%
U of M - Morris Campus	\$3,066.46	4,579	\$951.54	-68.97%
United Steel Products Co	\$1,281.84	5,420	\$1,052.84	-17.87%
United Taconite LLC - Fairlane Plant	\$1,442.41	6,099	\$1,134.62	-21.34%
US EPA - MED-Duluth	\$1,028.78	2,725	\$728.23	-29.21%
US Steel Minntac	\$2,520.40	10,412	\$1,654.13	-34.37%
USEM Inc - Body Shop	\$1,352.78	2,860	\$744.49	-44.97%
Valley Craft Inc	\$1,587.51	14,850	\$1,446.18	-8.90%
Vanpro Inc	\$1,092.63	6,480	\$856.52	-21.61%
Vector Tool & Manufacturing Inc	\$948.37	4,040	\$886.62	-6.51%
Viking Label & Packaging Inc	\$1,489.95	3,150	\$779.42	-47.69%
Viking Olds-Pontiac-Nissan-GMC	\$915.26	3,860	\$864.94	-5.50%
Viracon Inc - 4th St	\$4,161.22	12,810	\$1,942.96	-53.31%
Viracon Inc - Owatonna	\$1,108.59	6,750	\$875.54	-21.02%
Viracon/Curvlite Inc	\$2,394.57	6,600	\$1,194.97	-50.10%
Virginia Regional Medical Center	\$773.31	2,690	\$589.50	-23.77%
Watlow - Winona	\$4,422.55	12,050	\$1,851.42	-58.14%
Weigh Tronix Inc	\$2,008.87	10,607	\$1,677.61	-16.49%
Wenger Corp	\$1,630.43	8,655	\$1,442.49	-11.53%
We-no-nah Canoe Inc	\$2,069.38	5,500	\$1,062.48	-48.66%
Westin Automotive Products Inc	\$4,463.03	105,693	\$7,846.07	75.80%
Westling Manufacturing Co - Princeton	\$1,714.03	9,190	\$1,506.94	-12.08%
WestMor Industries LLC	\$2,168.71	4,770	\$974.55	-55.06%
Weyerhaeuser Co - Austin	\$1,258.18	2,660	\$720.40	-42.74%
Wheaton Community Hospital	\$2,994.09	6,330	\$1,162.45	-61.18%
Wincraft Inc	\$652.74	2,760	\$594.44	-8.93%
Winona Lighting Inc	\$1,690.98	4,400	\$929.98	-45.00%
Winona Printing Co	\$3,034.59	52,250	\$4,081.01	34.48%
Woitalla Service Inc	\$626.73	2,650	\$586.69	-6.39%
World Class Auto Body Inc	\$1,750.10	3,700	\$845.67	-51.68%
Worthington Tractor Parts	\$657.47	2,780	\$595.85	-9.37%
Wright Hennepin CEA	\$2,163.03	4,000	\$881.80	-59.23%
Xcel Energy - Prairie Island Nuclear Plt	\$1,424.70	3,647	\$839.28	-41.09%
Xcel Energy - Sherburne Generating Plant	\$1,137.59	3,934	\$873.85	-23.18%
X-cel Optical Co - Benton Dr	\$7,599.64	11,000	\$1,724.95	-77.30%
Zumbrota Bearing & Gear Inc	\$2,270.40	7,200	\$1,267.24	-44.18%

Metropolitan Area SQG and LQG Fee Modeling Results
 (*Scott and Dakota County not included)

County	Facility Name	2004 Fee Amount	Cap Adjusted Pounds	Predicted Fee	(+/-)
RAMSEY	3M	\$1,055.54	19,750	\$739.44	-29.95%
RAMSEY	3M CENTER-MAINTENANCE-RESEARCH	\$11,114.88	1,527,999	\$22,229.76	100.00%
Washington	3M Cottage Grove	\$106,373.01	2,000,000	\$57,333.00	-46.10%
RAMSEY	3M FAB SERVICES BLDG 99	\$654.18	7,984	-\$403.17	-38.37%
RAMSEY	3M ST PAUL DISTRIBUTION CENTER	\$618.92	7,350	\$385.06	-37.79%
Washington	3M Stillwater Building 1	\$610.56	27,160	\$584.55	-4.26%
RAMSEY	3M STPM	\$3,730.44	124,049	\$3,720.20	-0.27%
Washington	3M Woodbury Building 518	\$563.89	23,400	\$527.85	-6.39%
RAMSEY	3M-AVIATION DEPT	\$453.73	4,380	\$300.18	-33.84%
Hennepin	7-SIGMA	\$262.80	4,023	\$235.66	-10.33%
Hennepin	A & E METAL FINISHING INC	\$1,044.00	11,470	\$502.80	-51.84%
RAMSEY	AAA METAL FINISHING INC	\$2,977.21	2,700	\$252.16	-91.53%
Hennepin	ABBOTT NORTHWESTERN HOSPITAL (KENNEY INSTITUTE)	\$1,954.80	65,628	\$2,050.58	4.90%
Hennepin	ABELCONN LLC	\$1,044.00	53,865	\$987.23	-5.44%
Anoka	ABRA AUTO BODY	162.00	744	\$186.22	14.95%
Anoka	ABRA AUTO BODY & GLASS	295.20	2,200	\$237.87	-19.42%
Anoka	ABW PLATING SERVICE, INC	288.00	1,680	\$223.01	-22.57%
Hennepin	ACCELLENT CARDIOLOGY	\$522.00	29,720	\$623.15	19.38%
Anoka	ACCENT PRECISION WOOD PRODUCTS	295.20	3,080	\$221.44	-24.99%
Hennepin	ADDED VALUE TECHNOLOGY	\$3,909.60	40,520	\$1,333.02	-65.90%
Anoka	ADGRAPHICS	1090.80	9,256	\$439.53	-59.71%
Hennepin	ADS LLC	\$392.40	7,010	\$375.34	-4.35%
Washington	Advance Corporation	\$1,894.87	79,180	\$2,437.89	28.66%
Hennepin	ADVANCED BIO-SURFACES INC	\$262.80	3,700	\$230.79	-12.18%
Hennepin	ADVANCED RESEARCH CORP	\$262.80	4,005	\$235.39	-10.43%
RAMSEY	ADVANCED RESEARCH CORPORATION	\$163.48	555	\$183.37	12.16%
RAMSEY	ADVANCED WEB TECHNOLOGIES	\$240.00	1,220	\$193.40	-19.42%
Hennepin	ADVANCED WEB TECHNOLOGIES	\$392.40	4,950	\$316.47	-19.35%
Hennepin	AGFA PHOTO USA CORPORATION	\$392.40	7,200	\$380.77	-2.96%
RAMSEY	AGGRESSIVE IND INC	\$454.85	4,400	\$300.75	-33.88%
RAMSEY	ALLIANT AMMUNITION SYSTEMS CO LLC	\$4,269.47	159,280	\$4,727.06	10.72%
Anoka	ALLIANT TECHSYSTEMS INC PROVING GROUND	889.20	3,320	\$269.88	-69.65%

County	Facility Name	2004 Fee Amount	Cap Adjusted Pounds	Predicted Fee	(%)
Washington	Allied Electro Static of MN Inc	\$261.76	4,150	\$237.58	-9.24%
Hennepin	ALPHA CERAMICS INC	\$522.00	50,236	\$932.51	78.64%
Hennepin	ALPHA CIRCUIT TECHNOLOGY	\$522.00	21,370	\$497.24	-4.74%
Anoka	ALTRON INC	1159.20	4,520	\$304.18	-73.76%
Anoka	ALUMIPLATE, INC	2815.20	45,680	\$1,480.49	-47.41%
Hennepin	AMBASSADOR PRESS INC	\$392.40	17,220	\$434.66	10.77%
Hennepin	AMERICAN MEDICAL SYSTEMS	\$392.40	17,900	\$444.91	13.38%
Anoka	AMERICAN WOODMARK - HAM LAKE	522.00	11,184	\$494.63	-5.24%
RAMSEY	AMERICRAFT CARTON INC	\$785.48	10,646	\$479.25	-38.99%
RAMSEY	AMIDON GRAPHICS	\$560.52	6,300	\$355.05	-36.66%
Hennepin	ANAGRAM INTERNATIONAL INC	\$1,954.80	398,662	\$3,909.60	100.00%
RAMSEY	ANCHOR BLOCK COMPANY	\$337.23	2,360	\$242.45	-28.11%
Hennepin	ANDERBERG LUND PRINTING	\$522.00	13,400	\$557.96	6.89%
Washington	Andersen Corporation	\$4,339.40	533,500	\$8,219.65	89.42%
Hennepin	ANDERSON (WALTER G) INC	\$1,044.00	37,360	\$1,242.71	19.03%
Hennepin	ANDERSON AUTOMATICS INC	\$392.40	6,302	\$355.10	-9.50%
Hennepin	ANDERSON CADILLAC INC	\$262.80	650	\$193.58	-26.34%
RAMSEY	ANDERSON CLEANERS	\$1,050.13	5,055	\$319.47	-69.58%
Hennepin	ANDERSON LADD	\$392.40	6,600	\$363.62	-7.33%
Anoka	ANOKA TECHNICAL COLLEGE	162.00	760	\$186.46	15.10%
Carver	ANOTECH INC.	\$458.00	20,400	\$482.61	5.37%
Carver	APEX INTERNATIONAL	\$275.00	4,530	\$243.31	-11.52%
Hennepin	APW THERMAL MANAGEMENT	\$2,610.00	37,510	\$1,247.00	-52.22%
Hennepin	ARCA MINNESOTA INC	\$262.80	570	\$191.29	-27.21%
Anoka	ARMAMENT SYSTEMS DIVISION	684.00	4,336	\$298.92	-56.30%
Anoka	ARROW CRYOGENICS	878.40	14,792	\$597.74	-31.95%
RAMSEY	ARTISTIC FINISHES INC	\$738.00	9,491	\$446.24	-39.53%
RAMSEY	ASHLAND DISTRIBUTION COMPANY	\$2,445.00	66,590	\$2,078.08	-15.01%
Hennepin	ASI MODULEX MPLS	\$262.80	1,350	\$213.58	-18.73%
Hennepin	ASPEN EQUIPMENT	\$262.80	3,710	\$230.94	-12.12%
Anoka	ASSOCIATED SKIN CARE SPECIALISTS, P A	414.00	3,544	\$276.28	-33.26%
Anoka	ASSURANCE MFG INC	565.20	6,704	\$366.59	-35.14%
Hennepin	ASTLEFORD INTERNATIONAL TRUCKS INC	\$262.80	3,080	\$221.44	-15.74%
Hennepin	ATK ORDNANCE AND GROUND SYSTEMS LLC	\$262.80	1,198	\$209.24	-20.38%
Hennepin	ATK ORDNANCE AND GROUND SYSTEMS LLC	\$262.80	1,074	\$205.69	-21.73%
Hennepin	ATLAS MANUFACTURING	\$262.80	4,500	\$242.86	-7.59%
Hennepin	ATMI PACKAGING INC	\$392.40	6,384	\$357.45	-8.91%
Hennepin	ATS MEDICAL INC	\$262.80	4,400	\$241.35	-8.16%
Hennepin	AUTO TRUCK SERVICE CO	\$262.80	3,990	\$235.17	-10.52%
Hennepin	AUTOMOTIVE CONCEPTS	\$262.80	3,500	\$227.78	-13.33%
Anoka	AUTOMOTIVE REFINISHING TECHNOLOGIES	133.20	440	\$181.63	36.36%

County	Facility Name	2004 Fee Amount	Cap Adjusted Pounds	Predicted Fee	(1/3)
Anoka	AVEDA CORPORATION	2066.40	13,696	\$566.42	-72.59%
Washington	Aveka Inc	\$287.29	5,250	\$254.16	-11.53%
Hennepin	AVTEC FINISHING SYSTEMS	\$2,610.00	1,210,740	\$5,220.00	100.00%
Hennepin	AZTEC ELECTRONICS	\$1,044.00	63,600	\$1,134.02	8.62%
Hennepin	BANTA BOOK GROUP EDEN PRAIRIE	\$262.80	1,940	\$204.25	-22.28%
Hennepin	BANTA CATALOG MINNEAPOLIS	\$392.40	12,290	\$360.32	-8.18%
Hennepin	BANTA DIRECT MARKETING GROUP - THE PRESS	\$392.40	6,050	\$347.90	-11.34%
RAMSEY	BARNETT CHRYSLER	\$580.49	6,659	\$365.31	-37.07%
Carver	BECKMAN COULTER INC	\$915.00	90,010	\$1,532.26	67.46%
RAMSEY	BELL LUMBER AND POLE CO	\$4,820.89	14,450	\$587.97	-87.80%
Hennepin	BERGIN AUTO BODY	\$262.80	2,840	\$217.82	-17.11%
Anoka	BERMO INC	759.60	8,520	\$418.49	-44.91%
Hennepin	BEST BUY	\$262.80	3,120	\$222.05	-15.51%
Hennepin	BETHANY PRESS INTERNATIONAL	\$262.80	2,750	\$216.47	-17.63%
Hennepin	BFI WASTE SYSTEMS OF NORTH AMERICA	\$262.80	2,700	\$215.71	-17.92%
Anoka	BGK FINISHING SYSTEMS	565.20	4,576	\$305.78	-45.90%
Hennepin	BIRCHWOOD LABORATORIES INC	\$262.80	1,483	\$197.36	-24.90%
Anoka	BLAINE AUTO BODY	208.80	1,080	\$191.29	-8.39%
Hennepin	BODYCOTE THERMAL PROCESSING	\$392.40	7,785	\$397.49	1.30%
Hennepin	BON AUTO BODY AND GLASS INC	\$262.80	3,500	\$227.78	-13.33%
Carver	BONGARDS CREAMERIES	\$275.00	3,900	\$233.81	-14.98%
Hennepin	BORGEN RADIATOR CO	\$392.40	7,900	\$400.77	2.13%
Hennepin	BOSTON SCIENTIFIC/SCIMED	\$2,610.00	811,277	\$5,220.00	100.00%
Hennepin	BOSTON SCIENTIFIC/SCIMED	\$1,044.00	95,123	\$1,609.36	54.15%
Hennepin	BOULEVARD COLLISION	\$262.80	2,800	\$217.22	-17.34%
Hennepin	BRADY WORLDWIDE, INC	\$392.40	5,384	\$328.87	-16.19%
Hennepin	BRAUN INTERTEC CORPORATION	\$392.40	10,780	\$337.55	-13.98%
RAMSEY	BRENNTAG GREAT LAKES LLC	\$393.66	3,300	\$269.31	-31.59%
RAMSEY	BRENNTAG GREAT LAKES, LLC	\$3,494.83	104,800	\$3,170.08	-9.29%
RAMSEY	BRIGHTON CLEANERS	\$438.16	2,600	\$249.31	-43.10%
Hennepin	BRUSH MASTERS	\$1,044.00	35,200	\$1,180.98	13.12%
Hennepin	BUHLER INC	\$392.40	6,050	\$347.90	-11.34%
Hennepin	BUREAU GRAPHICS DIVISION (THE)	\$262.80	2,200	\$208.17	-20.79%
Hennepin	BYSTROM BROS INC	\$392.40	15,000	\$401.19	2.24%
Anoka	CARBIDE TOOL SERVICES INC	802.80	6,264	\$354.02	-55.90%
Hennepin	CARGILL DOW LLC	\$392.40	5,700	\$337.90	-13.89%
Hennepin	CARGILL FRESHWATER LABORATORIES	\$262.80	1,250	\$210.72	-19.82%

County	Facility Name	2004 Fee Amount	Cap Adjusted Pounds	Predicted Fee	(+/-)
Hennepin	CARGILL INCORPORATED	\$262.80	4,511	\$243.02	-7.53%
Hennepin	CARLSON (AARON) CORPORATION	\$262.80	2,291	\$209.55	-20.26%
Hennepin	CARLSON (WALLACE W) COMPANY	\$262.80	3,300	\$224.76	-14.47%
Hennepin	CARQUEST OF HOPKINS	\$262.80	2,105	\$206.74	-21.33%
Hennepin	CARRIAGE CLEANERS & LAUNDERERS	\$262.80	2,015	\$205.38	-21.85%
Anoka	CARTER DAY INTERNATIONAL INC	770.40	4,000	\$289.32	-62.45%
RAMSEY	CARVER GENERAL REPAIR	\$395.88	3,340	\$270.45	-31.68%
Hennepin	CASS SCREW MACHINE PRODUCTS	\$1,044.00	75,010	\$1,306.08	25.10%
RAMSEY	CASTROS COLLISION CENTER	\$276.67	1,650	\$222.16	-19.71%
Hennepin	CATERPILLAR PAVING PRODUCTS INC (RAYGO)	\$392.40	7,532	\$390.26	-0.55%
RAMSEY	CELESTICA	\$988.24	17,481	\$674.59	-31.74%
Hennepin	CENTERPOINT ENERGY MINNEGASCO SOUTH METRO	\$262.80	1,164	\$208.27	-20.75%
Washington	Central Regional Pathology Lab	\$572.18	4,040	\$290.46	-49.24%
RAMSEY	CENTRAL SAND BLASTING CO	\$229.77	1,100	\$191.59	-16.62%
RAMSEY	CENTURY CIRCUITS AND ELECTRONICS	\$3,154.86	90,520	\$2,761.97	-12.45%
Washington	Century College Campus	\$301.61	1,230	\$210.15	-30.32%
Hennepin	CENVEO	\$392.40	5,820	\$341.33	-13.01%
Hennepin	CERAMIC INDUSTRIAL COATINGS	\$1,044.00	69,000	\$1,215.45	16.42%
RAMSEY	CERTIFIED PAINTING INC	\$808.78	11,275	\$497.23	-38.52%
Hennepin	CHALLENGE PRINTING INC	\$1,044.00	57,200	\$1,037.52	-0.62%
Washington	Chandler Exhibits Inc	\$247.13	3,520	\$228.08	-7.71%
Carver	CHASKA HIGH SCHOOL	\$275.00	2,617	\$214.46	-22.02%
Anoka	CHEMICAL MARKETING CORP	295.20	3,960	\$234.71	-20.49%
Hennepin	CHILDREN'S HEALTH CARE MINNEAPOLIS	\$1,044.00	12,333	\$527.46	-49.48%
Hennepin	CIRCUIT SCIENCE INC	\$2,610.00	351,060	\$5,220.00	100.00%
Anoka	CITY OF MINNEAPOLIS WATER WORKS	237.60	904	\$188.63	-20.61%
Hennepin	CLARIANT MASTERBATCHES DIVISION	\$262.80	1,820	\$202.44	-22.97%
Hennepin	CLEAN N PRESS	\$392.40	4,335	\$298.89	-23.83%
Washington	Clean 'N Press	\$424.77	2,750	\$253.59	-40.30%
Hennepin	CLEAN N PRESS FOR LESS	\$262.80	4,400	\$241.35	-8.16%
Hennepin	CLIFFVIEW CLEANERS	\$522.00	40,000	\$778.16	49.07%
Hennepin	COLLISION CENTER INC	\$262.80	500	\$189.29	-27.97%
Hennepin	COLLISION CORNER	\$262.80	4,997	\$250.35	-4.74%
RAMSEY	COLOR TECHNOLOGIES INC	\$410.35	3,600	\$277.88	-32.28%
RAMSEY	COMPUTYPE INC	\$361.68	2,725	\$252.88	-30.08%
Hennepin	CONSOLIDATED CONTAINER COMPANY LLC	\$1,954.80	124,790	\$2,056.71	5.21%

County	Facility Name	2004 Fee Amount	Cap Adjusted Pounds	Predicted Fee	(%)
Anoka	CON-WAY CENTRAL EXPRESS	889.20	2,784	\$254.56	-71.37%
Anoka	COON RAPIDS RERS	446.40	6,856	\$370.94	-16.90%
RAMSEY	COOPERATIVE PLATING	\$11,465.98	1,311,190	\$19,946.43	73.96%
Hennepin	COOPERATIVE PRINTING ASSN	\$392.40	5,300	\$326.47	-16.80%
Anoka	COPPER SALES, INC.	651.60	4,000	\$289.32	-55.60%
Washington	Crossroads Collision Center	\$209.80	2,200	\$208.17	-0.78%
RAMSEY	CROWN IRON WORKS COMPANY	\$1,752.06	43,230	\$1,410.47	-19.50%
Hennepin	CRYSTAL GOLD EAGLE INC	\$392.40	4,130	\$293.03	-25.32%
RAMSEY	CURTIS 1000	\$615.59	7,290	\$383.34	-37.73%
Hennepin	CUSTOM FAB SOLUTIONS LLC	\$1,954.80	272,302	\$3,909.60	100.00%
Hennepin	CUSTOM ONE PREFINISHING INC	\$392.40	5,500	\$332.18	-15.35%
Hennepin	CYPRESS SEMICONDUCTOR INC	\$2,610.00	474,800	\$5,220.00	100.00%
Hennepin	DECOR TEC	\$262.80	1,340	\$213.30	-18.84%
Hennepin	DECORATORS SERVICE COMPANY	\$392.40	6,050	\$347.90	-11.34%
Hennepin	DELTAK LLC	\$392.40	14,375	\$391.76	-0.16%
Anoka	DEPENDABLE BRAKE SYSTEMS	295.20	3,632	\$229.77	-22.17%
Hennepin	DETECTOR ELECTRONICS	\$392.40	6,420	\$358.48	-8.64%
Anoka	DETERMAN BROWNIE INC	1634.40	95,488	\$1,614.86	-1.20%
RAMSEY	DIAMOND PRODUCTS	\$2,428.98	66,050	\$2,062.64	-15.08%
Hennepin	DIAMOND VOGEL NORTH INC	\$1,044.00	86,030	\$1,472.25	41.02%
Washington	DiaSorin Inc	\$339.06	7,480	\$287.79	-15.12%
RAMSEY	DIGITAL EXCELLENCE INC	\$658.97	8,070	\$405.63	-38.44%
Hennepin	DIVERSICO INDUSTRIES INC	\$262.80	2,970	\$219.78	-16.37%
Hennepin	DIVERSIFIED GRAPHICS INC	\$522.00	23,650	\$531.62	1.84%
Anoka	DODGE OF BLAINE INC	266.40	2,464	\$212.15	-20.36%
Hennepin	DONALDSON COMPANY INC	\$1,954.80	185,680	\$2,974.87	52.18%
Hennepin	DONALDSON COMPANY INC	\$522.00	27,500	\$589.67	12.96%
Hennepin	DOUGLAS CORP PLATING DIVISION	\$5,216.40	1,990,500	\$10,432.80	100.00%
Hennepin	DOUGLAS CORPORATION	\$2,610.00	582,650	\$5,220.00	100.00%
Hennepin	DOWNTOWN COLLISION	\$262.80	2,950	\$219.48	-16.48%
Carver	DS BROWN COMPANY CHASKA DIVISION	\$366.00	9,060	\$311.62	-14.86%
Anoka	DUGAS BOWERS PLATING CO	3128.40	534,328	\$6,256.80	100.00%
Hennepin	DUNWOODY COLLEGE OF TECHNOLOGY	\$262.80	3,982	\$235.04	-10.56%
Carver	DUPLICATION FACTORY INC.	\$275.00	2,360	\$210.59	-23.42%
Carver	DYNA-GRAPHICS CORPORATION	\$275.00	4,950	\$249.64	-9.22%
RAMSEY	DYNAMIC AIR INC	\$162.84	550	\$183.29	12.56%
Washington	Dyneon LLC	\$311.67	6,300	\$270.00	-13.37%
Anoka	E STREET MAKERS	266.40	2,200	\$208.17	-21.86%
Hennepin	EASTEY ENTERPRISES INC	\$262.80	4,750	\$246.63	-6.15%
Hennepin	EATON MDH INC EDEN PRAIRIE PLANT	\$522.00	6,210	\$352.48	-32.48%
Anoka	ECO FINISHING COMPANY	3394.80	1,168,176	\$6,789.60	100.00%

County	Facility Name	2004 Fee Amount	Cap. Adjusted Pounds	Predicted Fee	(%)
RAMSEY	ECOLAB CENTER	\$373.69	2,941	\$259.05	-30.68%
Washington	Ecowater Systems	\$211.62	2,240	\$208.78	-1.34%
Hennepin	EDCO PRODUCTS INC	\$1,044.00	63,850	\$1,137.79	8.98%
Hennepin	EDINA LAUNDRY CO	\$392.40	13,765	\$382.56	-2.51%
Hennepin	ED'S CARSTAR COLLISION	\$262.80	1,651	\$199.89	-23.94%
Hennepin	ELECTRIC MACHINERY CO	\$392.40	8,280	\$299.85	-23.58%
Hennepin	ELECTRO STATIC CORP	\$392.40	10,120	\$327.60	-16.51%
Hennepin	ELECTROCHEMICALS INC	\$3,909.60	65,810	\$2,055.78	-47.42%
RAMSEY	ELECTRONICS INDUSTRIES HOLDING	\$809.04	11,440	\$501.94	-37.96%
Hennepin	ELLIOT AVIATION OF MINNEAPOLIS INC	\$262.80	1,475	\$197.24	-24.95%
Anoka	ELO ENGINEERING INC	565.20	7,544	\$390.60	-30.89%
RAMSEY	E-M COATING SERVICES	\$903.10	14,611	\$592.57	-34.38%
RAMSEY	ENDOCARDIAL SOLUTIONS INC	\$602.29	7,051	\$376.51	-37.49%
RAMSEY	ENDOCARDIAL SOLUTIONS, INC.	\$550.07	6,112	\$349.67	-36.43%
Anoka	ENGINEERED FINISHING CORP	446.40	4,400	\$300.75	-32.63%
RAMSEY	ENOVATION GRAPHIC SYSTEMS INC	\$454.85	4,400	\$300.75	-33.88%
Hennepin	ENPATH MEDICAL INC	\$392.40	6,600	\$363.62	-7.33%
Hennepin	ENPATH MEDICAL INC.	\$392.40	6,600	\$363.62	-7.33%
Hennepin	ENVIRO-CHEM INC	\$1,044.00	42,254	\$812.15	-22.21%
Hennepin	ENVIRON ELECTRONIC LABORATORIES INC	\$262.80	2,020	\$205.46	-21.82%
Anoka	ENVIRONMENTAL PARTNERSHIPS, INC.	835.20	20,240	\$753.44	-9.79%
Hennepin	ENVIRONMENTS INC S CAMPUS	\$522.00	40,700	\$788.72	51.09%
RAMSEY	EV3 INCORPORATED	\$1,041.34	19,271	\$725.75	-30.31%
Hennepin	EXCEL METAL FINISHING INC	\$392.40	11,040	\$341.47	-12.98%
RAMSEY	EXPRESS IMAGE INC	\$363.07	2,750	\$253.59	-30.15%
Hennepin	FAIRVIEW UNIVERSITY MEDICAL CT RIVERSIDE CAMPUS	\$522.00	20,806	\$488.73	-6.37%
Hennepin	FAIRVIEW UNIVERSITY MEDICAL CT UNIVERSITY CAMPUS	\$522.00	29,703	\$622.89	19.33%
RAMSEY	FAIRWAY COLLISION CENTER INC	\$182.30	700	\$185.56	1.78%
Anoka	FEDERAL CARTRIDGE COMPANY	13190.40	1,074,736	\$16,380.94	24.19%
Anoka	FLEXCON CO INC	878.40	8,008	\$403.86	-54.02%
Anoka	FLINT INK NORTH AMERICA CORP	522.00	9,776	\$454.39	-12.95%
RAMSEY	FORD MOTOR COMPANY	\$11,114.88	1,011,080	\$15,421.08	38.74%
RAMSEY	FRATTALONE COMPANIES, INC.	\$795.09	10,970	\$488.51	-38.56%
RAMSEY	FREEWAY AUTO BODY INC	\$170.63	610	\$184.20	7.95%
Anoka	FRIENDLY CHEVROLET GEO INC	295.20	2,440	\$244.73	-17.10%
RAMSEY	FULLER H B CO	\$429.59	3,946	\$287.77	-33.01%

County	Facility Name	2004 Fee Amount	Cap. Adjusted Pounds	Predicted Fee	(%)
Hennepin	GAINES & HANSON PRINTING CO. INC	\$522.00	1,100	\$206.44	-60.45%
Anoka	GALE'S AUTO BODY INC	266.40	2,000	\$205.16	-22.99%
RAMSEY	GAMET MANUFACTURING INCORPORATED	\$479.87	4,850	\$313.61	-34.65%
Hennepin	GANNETT OFFSET MINNEAPOLIS	\$522.00	19,350	\$466.78	-10.58%
Hennepin	GARLOCK EQUIPMENT CO	\$392.40	6,600	\$363.62	-7.33%
Hennepin	GE OSMONICS INC	\$1,954.80	140,745	\$2,297.29	17.52%
Anoka	GE RAIL EM & R	1396.80	5,648	\$336.41	-75.92%
Carver	GEDNEY M.A. COMPANY	\$275.00	2,985	\$220.01	-20.00%
Hennepin	GEII GLOBAL ONSITE SERVICE	\$262.80	450	\$187.86	-28.52%
Hennepin	GENERAL DYNAMICS ADVANCED INFORMATION SYSTEMS	\$262.80	2,163	\$207.62	-21.00%
Hennepin	GENERAL LITHO SERVICES INC	\$1,044.00	38,050	\$1,262.43	20.92%
Hennepin	GENERAL MILLS (JAMES FORD BELL TECHNICAL CENTER)	\$392.40	14,640	\$395.76	0.86%
RAMSEY	GENERAL PATTERN CO	\$424.25	3,850	\$285.03	-32.82%
Hennepin	GENPAK LLC	\$1,044.00	60,510	\$1,087.43	4.16%
RAMSEY	GERDAU AMERISTEEL US INC. ST. PAUL MIL	\$11,114.88	2,000,000	\$22,229.76	100.00%
Hennepin	GOPHER MOTOR REBUILDING INC	\$1,954.80	156,000	\$2,527.32	29.29%
Hennepin	GOPHER STATE LITHO CORPORATION	\$262.80	4,000	\$235.32	-10.46%
Hennepin	GRACO MINNESOTA INC KOCH CTR	\$1,044.00	28,200	\$980.93	-6.04%
Hennepin	GRACO MINNESOTA INC TECHNICAL CTR	\$1,044.00	11,450	\$502.23	-51.89%
Hennepin	GRACO MINNESOTA RIVERSIDE	\$1,044.00	71,750	\$1,256.92	20.39%
Washington	Granger's Inc	\$163.81	1,190	\$192.94	17.79%
Hennepin	GREAT LAKES ENGINEERING INC	\$1,954.80	227,135	\$3,599.97	84.16%
Hennepin	GREATBATCH-GLOBE TOOL INC	\$522.00	8,572	\$419.98	-19.54%
Anoka	GREEN LIGHTS RECYCLING INC	1051.20	71,624	\$1,255.02	19.39%
RAMSEY	GREENHAVEN PRINTING	\$384.65	3,138	\$264.68	-31.19%
RAMSEY	GROSS GIVEN MFG CO	\$276.67	1,650	\$222.16	-19.71%
RAMSEY	GUIDANT CPI	\$1,407.86	31,627	\$1,078.87	-23.37%
Hennepin	HAGEN'S BODY SHOP	\$262.80	1,060	\$205.29	-21.88%
Hennepin	HALLMARK CLEANERS	\$392.40	7,120	\$378.48	-3.55%
Hennepin	HALLMARK CLEANERS (EDINA)	\$392.40	6,250	\$353.62	-9.88%
RAMSEY	HAMLIN UNIVERSITY	\$492.00	5,068	\$319.84	-34.99%
Hennepin	HANSON SPANCRETE MIDWEST INC	\$262.80	4,400	\$241.35	-8.16%
Hennepin	HARD ANODIZE INC	\$1,954.80	53,015	\$1,690.12	-13.54%
Hennepin	HARD CHROME INC	\$2,610.00	198,314	\$3,165.38	21.28%
Hennepin	HARDCOAT INC	\$1,044.00	46,005	\$868.71	-16.79%
Hennepin	HAROLD CHEVROLET INC	\$262.80	2,260	\$209.08	-20.44%

County	Facility Name	2004 Fee Amount	Cap Adjusted Pounds	Predicted Fee	(+/-)
Hennepin	HAUENSTEIN & BURMEISTER INC	\$392.40	16,934	\$430.35	9.67%
Hennepin	HAWKINS INC	\$522.00	2,750	\$253.59	-51.42%
RAMSEY	HB FULLER CO	\$2,773.72	16,040	\$633.41	-77.16%
RAMSEY	HEALTH EAST TRANSPORTATION	\$257.91	1,430	\$196.56	-23.79%
Carver	HEI COLLISION	\$275.00	2,200	\$208.17	-24.30%
Carver	HEI INC	\$366.00	9,470	\$317.80	-13.17%
Hennepin	HENNEPIN COUNTY MEDICAL CENTER	\$1,044.00	26,921	\$944.39	-9.54%
Hennepin	HENNEPIN COUNTY PUBLIC WORKS	\$262.80	1,100	\$206.44	-21.45%
Hennepin	HENNEPIN TECHNICAL COLLEGE	\$392.40	10,440	\$332.42	-15.28%
Hennepin	HENNEPIN TECHNICAL COLLEGE (EDEN PRAIRIE)	\$392.40	7,570	\$391.34	-0.27%
RAMSEY	HEPPNER AUTO BODY INC	\$276.67	1,650	\$222.16	-19.71%
Washington	Heppner's Auto Center	\$242.03	3,300	\$224.76	-7.14%
Washington	Heppner's Woodbury Auto Body	\$134.81	760	\$186.46	38.31%
Hennepin	HIAWATHA METALCRAFT INC	\$522.00	6,500	\$360.76	-30.89%
Hennepin	HIAWATHA RUBBER CO	\$392.40	3,300	\$269.31	-31.37%
Washington	Higher Dimension Research Inc	\$155.17	1,000	\$190.08	22.50%
RAMSEY	HIGHWAY EQUIP REFINISHING	\$363.07	2,750	\$253.59	-30.15%
Hennepin	HITCHCOCK INDUSTRIES INC	\$1,954.80	59,100	\$1,864.02	-4.64%
Anoka	HOFFMAN ENCLOSURES INC. MAIN	759.60	1,581	\$220.18	-71.01%
Hennepin	HOLADAY CIRCUITS INC	\$2,610.00	565,205	\$5,220.00	100.00%
RAMSEY	HOLIDAY TRUCK & EQUIPMENT	\$276.67	1,650	\$222.16	-19.71%
Carver	HOME DEPOT	\$275.00	2,668	\$215.23	-21.73%
Washington	Home Depot - 2820 Forest Lake	\$232.75	2,900	\$218.73	-6.02%
Hennepin	HOME DEPOT (THE) #2804	\$262.80	4,099	\$236.81	-9.89%
Hennepin	HOME DEPOT (THE) #2805	\$392.40	6,888	\$371.85	-5.24%
Hennepin	HOME DEPOT (THE) #2806	\$262.80	4,031	\$235.78	-10.28%
Hennepin	HOME DEPOT (THE) #2807	\$262.80	4,091	\$236.69	-9.94%
Hennepin	HOME DEPOT (THE) #2808	\$392.40	6,213	\$352.56	-10.15%
Hennepin	HOME DEPOT (THE) #2812	\$262.80	3,698	\$230.76	-12.19%
Washington	Home Depot 2819 Cottage Grove	\$198.42	1,950	\$204.40	3.02%
Washington	Home Depot, The - 2810	\$261.06	4,120	\$237.13	-9.17%
Hennepin	HONEYWELL DEFENSE & SPACE ELECTRONIC SYSTEMS MPLS	\$1,044.00	82,736	\$1,422.58	36.26%
Hennepin	HONEYWELL DEFENSE & SPACE ELECTRONICS SYS PLYMOUTH	\$1,954.80	55,183	\$1,752.07	-10.37%
RAMSEY	HONEYWELL- HIGHCREST FACILITY	\$794.35	10,945	\$487.80	-38.59%
Anoka	HONEYWELL INC COMMERCIAL FLIGHT SYSTEMS	921.60	5,768	\$339.84	-63.12%
Hennepin	HONEYWELL INTERNATIONAL INC	\$5,216.40	80,243	\$2,468.26	-52.68%
RAMSEY	HOOD FLEXIBLE PACKAGING	\$1,940.39	49,579	\$1,591.92	-17.96%

County	Facility Name	2004 Fee Amount	Cap Adjusted Pounds	Predicted Fee	(%)
Carver	HOUR GLASS CLEANERS	\$458.00	10,560	\$476.79	4.10%
Hennepin	HOUR GLASS CLEANERS	\$392.40	5,360	\$328.18	-16.37%
RAMSEY	HURD MAINTENANCE INC	\$276.67	1,650	\$222.16	-19.71%
Hennepin	HUTCHINSON TECHNOLOGY INC	\$5,216.40	66,558	\$2,077.16	-60.18%
Carver	HYDRO ENGINEERING INC2	\$275.00	4,360	\$240.74	-12.46%
RAMSEY	IDEAL PRINTERS INC	\$577.21	6,600	\$363.62	-37.00%
Hennepin	ILLBRUCK INC	\$262.80	4,620	\$244.66	-6.90%
Washington	Imation Enterprises Corp - Discovery	\$1,816.33	146,290	\$2,380.91	31.08%
RAMSEY	IMPRESSIONS INC	\$592.30	2,320	\$241.30	-59.26%
Hennepin	INDUSTRIAL FABRICS CORP	\$262.80	4,550	\$243.61	-7.30%
Washington	Industrial Painting Specialists	\$401.28	10,300	\$330.31	-17.68%
Hennepin	INFINITE GRAPHICS	\$392.40	3,200	\$266.45	-32.10%
Hennepin	INNO FLEX CORPORATION	\$392.40	14,520	\$393.95	0.39%
Hennepin	INNOTEK CORPORATION	\$262.80	4,000	\$235.32	-10.46%
RAMSEY	INNOVENT	\$546.62	6,050	\$347.90	-36.35%
Hennepin	INNOVEX INC	\$3,909.60	133,100	\$3,978.86	1.77%
Anoka	INTEGRIS METALS, INC.	532.80	2,768	\$254.11	-52.31%
Hennepin	INTERPLASTIC CORP THERMOSET	\$1,954.80	224,829	\$3,565.20	82.38%
RAMSEY	INTERPLASTIC CORPORATION	\$1,318.07	28,600	\$992.36	-24.71%
Anoka	INTERPOLL LABORATORIES INC	403.20	2,128	\$235.82	-41.51%
Anoka	INTERSTATE DETROIT DIESEL	266.40	1,872	\$203.23	-23.71%
RAMSEY	INTERSTATE TRUCK INC.	\$197.10	814	\$187.27	-4.99%
Anoka	INVEST CAST INC	1094.40	355,536	\$2,188.80	100.00%
RAMSEY	INX INTERNATIONAL INK CO	\$399.17	3,399	\$272.14	-31.82%
RAMSEY	ISD 625 DSF	\$251.01	658	\$193.80	-22.79%
Hennepin	ITEN CHEVROLET COMPANY	\$262.80	650	\$193.58	-26.34%
RAMSEY	IVC NORTH INC	\$2,728.03	76,131	\$2,350.75	-13.83%
RAMSEY	J AND L WIRE CLOTH CO INC	\$223.37	1,025	\$190.46	-14.74%
Hennepin	JAPS OLSON COMPANY	\$1,044.00	26,200	\$923.77	-11.52%
Anoka	JOHN ROBERTS PRINTING CO	1548.00	70,704	\$1,241.15	-19.82%
Hennepin	JOHNSON FINISHING COMPANY	\$392.40	6,000	\$346.47	-11.70%
Anoka	JOHNSON PRINTING AND PACKAGING CORP	691.20	8,976	\$431.53	-37.57%
Hennepin	JONES (J R) FIXTURE CO	\$392.40	5,500	\$332.18	-15.35%
Hennepin	JOYNER'S DIE CASTING & PLATING CO	\$1,044.00	38,934	\$1,287.69	23.34%
Hennepin	KANGAS ENAMELING	\$392.40	10,980	\$340.57	-13.21%
Hennepin	KAPAK	\$1,044.00	52,800	\$971.17	-6.98%
RAMSEY	KATH FUEL OIL SERVICE	\$255.36	1,400	\$196.11	-23.20%
Hennepin	KAUFMAN CONTAINER	\$262.80	1,850	\$202.90	-22.79%
Hennepin	KEN'S METAL FINISHING	\$392.40	8,955	\$310.03	-20.99%
Anoka	KEYSTONE AUTOMOTIVE	295.20	2,000	\$232.16	-21.36%
Hennepin	KEYSTONE AUTOMOTIVE INDUSTRIES	\$262.80	2,200	\$208.17	-20.79%
Washington	Kiss's Auto Body & Frame Shop	\$210.25	2,210	\$208.32	-0.92%
Anoka	KURT MANUFACTURING CO -	522.00	14,000	\$575.11	10.17%

County	Facility Name	2004 Fee Amount	Cap. Adjusted Pounds	Predicted Fee	(+/-)
Hennepin	KURT MANUFACTURING COMPANY	\$1,044.00	14,182	\$580.31	-44.42%
Anoka	KURT MANUFACTURING MAIN ST	2325.60	51,360	\$1,642.82	-29.36%
Anoka	KWIK-FILE	522.00	14,080	\$577.39	10.61%
Hennepin	LAKE ENGINEERING INC	\$262.80	1,460	\$216.73	-17.53%
Carver	LAKE REGION MFG INC	\$458.00	19,656	\$471.39	2.92%
Carver	LAKE REGION MFG INC	\$275.00	4,491	\$242.72	-11.74%
Hennepin	LAKELAND GRAPHICS	\$262.80	3,300	\$224.76	-14.47%
Anoka	LAKELAND TOOL AND ENGINEERING INC.	414.00	3,384	\$271.71	-34.37%
Hennepin	LAMETTRY'S COLLISION INC	\$262.80	3,900	\$233.81	-11.03%
Hennepin	LAMETTRY'S COLLISION INC	\$262.80	2,580	\$213.90	-18.61%
RAMSEY	LAMETTRY'S COLLISION INC	\$585.55	6,750	\$367.91	-37.17%
RAMSEY	LATUFF BROTHERS INC	\$363.07	2,750	\$253.59	-30.15%
RAMSEY	LAWRENCE SIGN CO	\$489.77	5,028	\$318.70	-34.93%
Hennepin	LEAF INDUSTRIES INC	\$392.40	7,900	\$400.77	2.13%
Hennepin	LEEF BROS INC	\$1,044.00	98,320	\$1,657.57	58.77%
RAMSEY	LEE'S COLLISION CENTER	\$238.30	1,200	\$193.09	-18.97%
Hennepin	LEHMAN'S GARAGE INC	\$262.80	1,100	\$206.44	-21.45%
Hennepin	LEHMAN'S IN BLOOMINGTON	\$262.80	1,440	\$216.15	-17.75%
Hennepin	LEJEUNE STEEL CO	\$262.80	1,650	\$199.88	-23.94%
Carver	LENZEN CHEVROLET-BUICK	\$366.00	9,750	\$322.02	-12.02%
Anoka	LEROY'S CUSTOM PAINTING INC	295.20	3,120	\$222.05	-24.78%
Anoka	LEXINGTON MANUFACTURING, INC.	910.80	25,680	\$908.91	-0.21%
RAMSEY	LIBERTY CHECK PRINTERS	\$441.50	4,160	\$293.89	-33.43%
Hennepin	LIFETOUCH DIGITAL STUDIO SUPPORT NC	\$392.40	9,000	\$310.71	-20.82%
RAMSEY	LIFT STAK & STOR INC	\$233.18	1,140	\$192.19	-17.58%
Hennepin	LINFOR INC	\$1,044.00	7,520	\$389.91	-62.65%
RAMSEY	LITHO INC	\$1,008.08	18,150	\$693.71	-31.19%
Hennepin	LITHO TECHNICAL SERVICES	\$392.40	5,810	\$341.04	-13.09%
RAMSEY	LKT LABORATORIES	\$740.62	9,538	\$447.59	-39.57%
Washington	LSP - Cottage Grove LP	\$201.38	730	\$186.01	-7.63%
RAMSEY	LUMINAIRE RECYCLERS INC	\$2,870.71	80,941	\$2,488.21	-13.32%
Hennepin	LUTHER WEST SIDE VOLKSWAGEN	\$392.40	6,840	\$370.48	-5.59%
Hennepin	LUTHER'S (RUDY) HOPKINS HONDA (BODY SHOP)	\$392.40	6,500	\$360.76	-8.06%
RAMSEY	L-Z COMPANY INC	\$374.75	2,960	\$259.59	-30.73%
Anoka	M & D METAL FINISHING INC	640.80	11,000	\$489.37	-23.63%
RAMSEY	MAACO AUTO PAINTING	\$535.49	5,850	\$342.19	-36.10%
Hennepin	MAACO AUTO PAINTING & BODYWORKS	\$262.80	2,660	\$215.11	-18.15%
Hennepin	MAACO AUTO PAINTING AND BODYWORKS	\$262.80	3,450	\$227.02	-13.61%
RAMSEY	MACALESTER COLLEGE	\$455.51	4,412	\$301.09	-33.90%

County	Facility Name	2004 Fee Amount	Cap Adjusted Pounds	Predicted Fee	(+/-)
Hennepin	MACDERMID COLORSPAN INC	\$262.80	1,100	\$206.44	-21.45%
Hennepin	MACK ENGINEERING CORP	\$262.80	2,750	\$216.47	-17.63%
Hennepin	MACTAC ENGINEERED PRODUCTS	\$392.40	7,664	\$394.03	0.42%
Washington	Madsen Fixture & Millwork Inc	\$184.76	1,650	\$199.88	8.18%
RAMSEY	MAGELLAN PIPELINE COMPANY, L.P.	\$549.40	6,100	\$349.33	-36.42%
Hennepin	MAIL HANDLING INC	\$262.80	4,490	\$242.70	-7.65%
Anoka	MAIN MOTORS CHEVROLET CADILLAC	684.00	7,768	\$397.00	-41.96%
Hennepin	MALL OF AMERICA/WASTE RECV. DEPT.	\$262.80	5,000	\$250.40	-4.72%
Carver	MAMMOTH INC.	\$275.00	3,850	\$233.05	-15.25%
Carver	MANUS PRODUCTS INC	\$275.00	4,611	\$244.53	-11.08%
Washington	Marathon Ashland Petroleum LLC	\$261.76	4,150	\$237.58	-9.24%
Washington	Marathon Petroleum Company LLC	\$55,270.58	2,000,000	\$57,333.00	3.73%
Washington	Marathon Petroleum Company LLC - Cottage	\$327.92	7,000	\$280.55	-14.44%
Hennepin	MARCOM SERVICES INC	\$392.40	12,000	\$355.95	-9.29%
Hennepin	MARRIOT HOTEL-CITY CENTER	\$262.80	2,030	\$205.61	-21.76%
Hennepin	MARTINIZING CLEANERS	\$262.80	2,350	\$210.44	-19.93%
Carver	MAXIMUM GRAPHICS INC	\$915.00	26,526	\$933.09	1.98%
Hennepin	MAXWELL AIRCRAFT SERVICE	\$392.40	9,520	\$318.55	-18.82%
Washington	MCF - Stillwater	\$457.75	14,850	\$398.92	-12.85%
RAMSEY	MCGOUGH CONSTRUCTION	\$383.15	3,111	\$263.91	-31.12%
Hennepin	MCLAUGHLIN GORMLEY KING	\$262.80	4,250	\$239.09	-9.02%
Hennepin	MED TEK	\$392.40	8,850	\$308.45	-21.39%
Carver	MEDALLION CABINERY INC	\$1,830.00	290,443	\$3,660.00	100.00%
Hennepin	MEDICAL ARTS PRESS	\$392.40	6,250	\$353.62	-9.88%
RAMSEY	MEDTOX LABORATORIES INC	\$711.14	9,008	\$432.44	-39.19%
Hennepin	MEDTRONIC ENERGY AND COMPONENT CENTER	\$522.00	21,105	\$493.24	-5.51%
Hennepin	MEDTRONIC ENERGY AND COMPONENT CENTER	\$392.40	5,680	\$337.33	-14.03%
Anoka	MEDTRONIC INC	997.20	13,936	\$573.28	-42.51%
Anoka	MEDTRONIC INC NEUROLOGICAL DIV	1753.20	7,288	\$383.28	-78.14%
Hennepin	MEDTRONIC PERFUSION SYSTEMS	\$392.40	11,385	\$346.67	-11.65%
Anoka	MEDTRONIC WORLD HEADQUARTERS	1515.60	7,144	\$379.17	-74.98%
Anoka	MENTOR MANUFACTURING INC	640.80	10,120	\$464.22	-27.56%
Hennepin	MENTOR MINNESOTA INC	\$262.80	1,750	\$201.39	-23.37%
Hennepin	MENTOR UROLOGY INC	\$522.00	28,850	\$610.03	16.86%
RAMSEY	MERCURY WASTE SOLUTIONS	\$7,247.84	411,419	\$6,378.79	-11.99%
Anoka	MERCY HOSPITAL	586.80	2,848	\$256.39	-56.31%
Hennepin	MEREEN-JOHNSON MACHINE CO	\$262.80	3,250	\$224.01	-14.76%

County	Facility Name	2004 Fee Amount	Cap Adjusted Pounds	Predicted Fee	(+/-)
RAMSEY	MERIT CHEVROLET CO	\$142.44	450	\$181.79	27.62%
Hennepin	MERIT GAGE INC (MEADOWBROOK ROAD)	\$262.80	550	\$190.72	-27.43%
Hennepin	MESABA AIRLINES	\$262.80	4,400	\$241.35	-8.16%
RAMSEY	MET COUNCIL METROPOLITAN WWTP	\$1,622.56	5,086	\$320.35	-80.26%
Hennepin	METHODIST HOSPITAL	\$522.00	3,620	\$278.46	-46.66%
Hennepin	METRO MACHINE & ENGINEERING CORP	\$392.40	8,730	\$306.64	-21.86%
Anoka	METRO MOULDED PARTS	414.00	3,960	\$288.17	-30.39%
Hennepin	MEYERS PRINTING CO	\$392.40	9,900	\$324.28	-17.36%
Carver	MGK	\$1,830.00	182,115	\$2,921.11	59.62%
RAMSEY	MICOM CORPORATION	\$8,834.16	590,211	\$9,074.79	2.72%
Hennepin	MID-CONTINENT ENGINEERING INC	\$1,044.00	28,600	\$992.36	-4.95%
RAMSEY	MIDWAY CLEANERS	\$453.00	1,000	\$203.58	-55.06%
RAMSEY	MIDWAY CLEANERS	\$678.68	2,100	\$235.02	-65.37%
Hennepin	MIDWEST FINISHING INC	\$5,216.40	107,500	\$3,247.24	-37.75%
Anoka	MIDWEST GREAT DANE/KOLSTAD COMPANY	208.80	1,136	\$192.13	-7.98%
Hennepin	MIDWEST SCREW PRODUCTS INC	\$392.40	10,450	\$332.58	-15.25%
RAMSEY	MIDWEST SIGN AND SCREEN PRINTING	\$525.48	5,670	\$337.04	-35.86%
Carver	MILLTRONICS MANUFACTURING (IND INFO CONTROL)	\$275.00	2,595	\$214.13	-22.13%
Anoka	MINCO PRODUCTS INC	2682.00	17,841	\$684.88	-74.46%
Hennepin	MINNEAPOLIS (CITY OF) TRAFFIC ENGINEERING, BORDER	\$392.40	3,850	\$285.03	-27.36%
Hennepin	MINNEAPOLIS AUTO AUCTION	\$392.40	11,823	\$353.27	-9.97%
Hennepin	MINNEAPOLIS COLLEGE OF ART AND DESIGN	\$392.40	8,300	\$300.16	-23.51%
Hennepin	MINNEAPOLIS MEDICAL RESEARCH	\$262.80	977	\$202.92	-22.78%
Hennepin	MINNEAPOLIS SCHOOLS (EDUCATION SERVICE CENTER)	\$392.40	5,644	\$336.30	-14.30%
Hennepin	MINNESOTA AIR NATIONAL GUARD 133 AIRLIFT WING	\$392.40	11,464	\$347.87	-11.35%
RAMSEY	MINNESOTA COMMERCIAL RW CO	\$332.11	2,300	\$240.73	-27.52%
Hennepin	MINNESOTA DEPARTMENT OF HEALTH	\$522.00	4,450	\$302.18	-42.11%
Hennepin	Minnesota Metal Finishing Inc	\$1,954.80	169,304	\$2,727.94	39.55%
Hennepin	MINNESOTA METAL FINISHING INC - PLANT 2	\$1,044.00	53,000	\$974.19	-6.69%
RAMSEY	MINNESOTA MUTUAL LIFE INS CO	\$363.07	2,750	\$253.59	-30.15%
Hennepin	MINNETONKA COLLISION CENTER	\$262.80	2,800	\$217.22	-17.34%

County	Facility Name	2004 Fee Amount	Cap Adjusted Pounds	Predicted Fee	(1/%)
Hennepin	MINNTECH CORP. (RENAL SYSTEMS)	\$392.40	2,505	\$246.59	-37.16%
RAMSEY	MN DEPT OF AGRICULTURE LAB SERV DIV	\$478.61	2,994	\$260.57	-45.56%
RAMSEY	MNDOT	\$528.13	2,751	\$253.62	-51.98%
Hennepin	MOORE WALLACE METRO PRINTING	\$262.80	2,600	\$214.21	-18.49%
Hennepin	MORRIE'S MINNETONKA FORD	\$392.40	8,700	\$306.19	-21.97%
Hennepin	MORRIE'S SAAB/SUBARU	\$262.80	3,267	\$224.26	-14.66%
Hennepin	MTS SYSTEMS CORPORATION	\$392.40	17,925	\$445.29	13.48%
Hennepin	NAPCO INTERNATIONAL LLC	\$392.40	7,000	\$375.05	-4.42%
RAMSEY	NBCOMF	\$275.14	1,632	\$221.64	-19.44%
Hennepin	NELSON (JULIUS B) & SONS	\$262.80	1,520	\$197.92	-24.69%
RAMSEY	NEW BRIGHTON FORD	\$217.99	975	\$189.70	-12.98%
Hennepin	NEW HOPE (CITY OF)	\$262.80	2,310	\$209.83	-20.16%
Hennepin	NEWGATE EDUCATION & RESEARCH CENTER IND.	\$262.80	2,780	\$216.92	-17.46%
Washington	Newport Terminal Corporation	\$193.87	1,850	\$202.90	4.66%
Hennepin	NICO PRODUCTS INC	\$3,909.60	1,576,000	\$7,819.20	100.00%
Washington	NLR/Samsung Information Systems of Ameri	\$995.98	58,210	\$1,052.75	5.70%
Washington	NLR/Wyard Industries	\$273.37	4,650	\$245.12	-10.33%
Hennepin	NORCOSTCO INC	\$392.40	8,555	\$304.00	-22.53%
Hennepin	NORDQUIST SIGNS	\$392.40	6,050	\$347.90	-11.34%
Anoka	NOR-ELL INCORPORATED	572.40	9,064	\$434.04	-24.17%
Anoka	NORTHERN TECHNOLOGIES INTERNATIONAL CORP	208.80	872	\$188.15	-9.89%
Hennepin	NORTHLAND ALUMINUM PRODUCTS INC	\$1,044.00	36,982	\$1,231.91	18.00%
Hennepin	NORTHLAND BINDER PRODUCTS INC	\$392.40	7,000	\$375.05	-4.42%
RAMSEY	NORTHLAND PAINTING & DECORATING INC	\$276.67	1,650	\$222.16	-19.71%
Anoka	NORTHLAND SCREW PRODUCTS INC	180.00	1,400	\$196.11	8.95%
Hennepin	NORTHSTAR COMPUTER FORMS INC	\$392.40	4,960	\$316.75	-19.28%
RAMSEY	NORTHSTAR FINANCIAL FORMS	\$611.58	7,218	\$381.28	-37.66%
Anoka	NORTHTOWN YARD	324.00	2,160	\$236.73	-26.93%
Hennepin	NORTHWEST AIRLINES INC	\$2,610.00	1,558,845	\$5,220.00	100.00%
Hennepin	NORTHWEST AUTOMATIC PRODUCTS INC	\$1,044.00	50,650	\$938.75	-10.08%
Hennepin	NORTHWEST SWISS-MATIC INC	\$522.00	20,405	\$482.69	-7.53%
Hennepin	NOVARTIS NUTRITION CORP	\$392.40	1,700	\$223.58	-43.02%
Washington	Nu-Life Dry Cleaners Inc	\$466.17	4,150	\$293.60	-37.02%
Hennepin	OMNI REMANUFACTURING	\$262.80	1,200	\$209.29	-20.36%
RAMSEY	OMNI-TRACT SURGICAL	\$363.07	2,750	\$253.59	-30.15%

County	Facility Name	2004 Fee Amount	Cap Adjusted Pounds	Predicted Fee	(%)
Anoka	ONAN CORPORATION	2012.40	40,200	\$1,323.88	-34.21%
RAMSEY	ONE HOUR MARTINIZING #509	\$465.97	3,100	\$263.59	-43.43%
Washington	P3 Scientific	\$472.41	16,030	\$416.72	-11.79%
Hennepin	PACE ANALYTICAL SERVICES INC	\$1,044.00	39,747	\$1,310.93	25.57%
Hennepin	PADDOCK LABS	\$522.00	16,582	\$425.04	-18.57%
Washington	Painting Perfection Ltd	\$1,183.66	73,330	\$1,280.74	8.20%
RAMSEY	PALMER JOHNSON DISTRIBUTORS LLC	\$340.64	2,400	\$243.59	-28.49%
RAMSEY	PAR SYSTEMS INC	\$353.06	2,570	\$248.45	-29.63%
Hennepin	PARAGON FORMS INC	\$262.80	2,850	\$217.98	-17.06%
Hennepin	PARK PRINTING INC	\$262.80	2,750	\$216.47	-17.63%
Anoka	PARKER HANNIFIN	295.20	1,336	\$213.18	-27.78%
RAMSEY	PARKER HUGHES INSTITUTE	\$311.47	2,058	\$233.82	-24.93%
Hennepin	PEARL BATHS INC	\$1,044.00	13,170	\$551.39	-47.19%
Hennepin	PECHINEY PLASTIC PACKAGING INC	\$1,954.80	323,130	\$3,909.60	100.00%
Hennepin	PECHINEY PLASTIC PACKAGING INC	\$1,954.80	177,185	\$2,846.77	45.63%
Hennepin	PGI COMPANIES	\$392.40	10,450	\$332.58	-15.25%
Hennepin	PILGRIM CLEANERS	\$262.80	3,248	\$223.98	-14.77%
Hennepin	PILGRIM CLEANERS	\$392.40	4,781	\$311.64	-20.58%
Hennepin	PILGRIM CLEANERS	\$392.40	4,040	\$290.46	-25.98%
Hennepin	PILGRIM CLEANERS	\$392.40	3,260	\$268.17	-31.66%
Hennepin	PILGRIM CLEANERS INC	\$392.40	7,220	\$381.34	-2.82%
Hennepin	PIONEER METAL FINISHING	\$522.00	6,750	\$367.91	-29.52%
Anoka	PLASTI DIP INTERNATIONAL INC	640.80	10,560	\$476.79	-25.59%
RAMSEY	PLATING INCORPORATED	\$12,012.09	523,120	\$15,125.25	25.92%
Anoka	PLAZA CLEANERS	565.20	7,392	\$386.26	-31.66%
Carver	PMT CORPORATION	\$366.00	8,800	\$307.70	-15.93%
Hennepin	POLARFAB LLC	\$2,610.00	358,503	\$5,220.00	100.00%
Anoka	POSSIS MEDICAL, INC.	295.20	3,960	\$234.71	-20.49%
Carver	POWER PROCESS EQUIPMENT, INC.	\$458.00	24,200	\$539.91	17.88%
Hennepin	PPG INDUSTRIES INC 1831	\$262.80	1,500	\$197.62	-24.80%
Hennepin	PRECISE PRODUCTS CORPORATION	\$262.80	3,000	\$220.24	-16.20%
Hennepin	PRECISION GRAPHICS INC	\$262.80	1,100	\$206.44	-21.45%
Hennepin	PRECISION GROUP LLC	\$392.40	8,200	\$298.65	-23.89%
Hennepin	PRESTIGE LINCOLN-MERCURY CO	\$262.80	1,280	\$211.58	-19.49%
RAMSEY	PRINTCRAFT INC	\$961.51	16,580	\$648.84	-32.52%
Hennepin	PRINTED CIRCUITS INC	\$522.00	122,000	\$1,044.00	100.00%
Hennepin	PRINTING ARTS INC	\$392.40	8,250	\$299.40	-23.70%
RAMSEY	PRINTING ENTERPRISES INC.	\$276.67	1,650	\$222.16	-19.71%
Hennepin	PRIORITY ENVELOPE INC	\$262.80	3,900	\$233.81	-11.03%
Hennepin	PROCESS DISPLAYS CO	\$392.40	14,850	\$398.92	1.66%
RAMSEY	PROFESSIONAL AUTO BODY	\$447.61	4,270	\$297.03	-33.64%

County	Facility Name	2004 Fee Amount	Cap Adjusted Pounds	Predicted Fee	(%)
Anoka	PROFESSIONAL PLATING, INC.	3499.20	107,400	\$3,244.38	-7.28%
Hennepin	PROGRESS CASTING GROUP	\$392.40	2,100	\$235.02	-40.11%
Hennepin	PROMED MOLDED PRODUCTS INC	\$392.40	7,970	\$295.18	-24.78%
Carver	PRO-TECH INTERCONNECT SOLUTIONS LLC	\$1,830.00	104,940	\$1,757.39	-3.97%
Hennepin	QUALITY ASSURED LABEL INC	\$392.40	5,500	\$332.18	-15.35%
Anoka	QUALITY PAINTING AND METAL FINISHING INC	684.00	7,800	\$397.92	-41.83%
RAMSEY	QUEST DIAGNOSTICS CLINICAL LABORATORIES	\$991.76	17,600	\$677.99	-31.64%
Hennepin	R & D SYSTEMS	\$522.00	46,680	\$878.89	68.37%
Hennepin	RAINBOW INC	\$392.40	19,150	\$463.76	18.19%
RAMSEY	RAYVEN INC	\$952.75	16,285	\$640.41	-32.78%
Anoka	RB PAINTING AND METAL FINISHING INC	295.20	3,208	\$223.37	-24.33%
RAMSEY	RED ROBIN CLEANERS	\$356.56	2,633	\$250.25	-29.82%
Hennepin	REFLECTIONS PRINTING INC	\$262.80	3,300	\$224.76	-14.47%
RAMSEY	REGENT AVIATION	\$344.90	2,450	\$245.02	-28.96%
RAMSEY	REGIONS HOSPITAL	\$1,125.14	22,096	\$806.48	-28.32%
Carver	RELIZON	\$275.00	3,110	\$221.90	-19.31%
Anoka	REMEL INC., RAMSEY OPERATIONS	759.60	10,672	\$480.00	-36.81%
RAMSEY	REMMELE ENGINEERING PLANT 10	\$414.80	3,680	\$280.17	-32.46%
Hennepin	REVIVA	\$392.40	20,000	\$476.58	21.45%
RAMSEY	REXAM BEVERAGE CAN COMPANY	\$288.87	1,793	\$226.24	-21.68%
Carver	RIDGEVIEW MEDICAL CENTER	\$458.00	11,428	\$347.33	-24.16%
RAMSEY	RIHM MOTOR COMPANY	\$723.10	9,223	\$438.58	-39.35%
Hennepin	RITRAMA INC	\$1,044.00	96,460	\$1,629.52	56.08%
Anoka	RMS CO	1047.60	8,216	\$409.81	-60.88%
Hennepin	ROGER'S BODY SHOP	\$262.80	2,400	\$211.19	-19.64%
RAMSEY	ROSEDALE CHEVROLET	\$340.64	2,400	\$243.59	-28.49%
Carver	ROSEMOUNT INC.	\$458.00	14,808	\$398.29	-13.04%
Hennepin	ROSEMOUNT INC/EMERSON PROCESS MGMT	\$392.40	4,900	\$315.04	-19.72%
Hennepin	ROYAL BUSINESS FORMS	\$392.40	8,300	\$300.16	-23.51%
Washington	Saint Croix Cleaners & Laundry	\$388.11	1,920	\$229.87	-40.77%
RAMSEY	SAINT PAUL COLLEGE	\$250.67	1,345	\$195.28	-22.10%
RAMSEY	SAINT PAUL PARKS & REC	\$366.41	2,810	\$255.31	-30.32%
Hennepin	SANDERS STARTBRIGHT CLEANERS	\$262.80	2,750	\$216.47	-17.63%
Hennepin	SCHOENFELDER PAINTING INC	\$262.80	2,500	\$212.70	-19.06%
Washington	Schwieter's Co	\$332.56	7,200	\$283.57	-14.73%
RAMSEY	SCHWING AMERICA INC	\$2,515.01	68,950	\$2,145.52	-14.69%
Hennepin	SCOVILLE PRESS INC	\$392.40	6,050	\$347.90	-11.34%
Hennepin	SEAGATE TECHNOLOGY LLC	\$1,954.80	144,771	\$2,358.00	20.63%

County	Facility Name	2004 Fee Amount	Cap Adjusted Pounds	Predicted Fee	(%)
RAMSEY	SEARS ROEBUCK & CO #6522/7510/1052	\$654.41	7,988	\$403.29	-38.37%
Hennepin	SEARS ROEBUCK & CO 9271/8702/89702/77308/88702	\$262.80	440	\$187.57	-28.62%
RAMSEY	SEARS ROEBUCK AND CO NO 1122/6122	\$524.01	5,644	\$336.30	-35.82%
Hennepin	SEARS ROEBUCK AND COMPANY 1032/6372/7462	\$262.80	384	\$185.97	-29.23%
RAMSEY	SEWALL GEAR MFG CO	\$552.18	6,150	\$350.76	-36.48%
Hennepin	SHAPCO PRINTING INC	\$392.40	6,600	\$363.62	-7.33%
Hennepin	SHERWIN WILLIAMS CO	\$1,044.00	93,900	\$1,590.92	52.39%
Hennepin	SHERWIN WILLIAMS CO #3163	\$522.00	25,850	\$564.79	8.20%
Washington	Shorty Cleaner Launderer Inc	\$145.84	890	\$188.42	29.20%
Hennepin	SIERRA CORPORATION	\$1,954.80	138,733	\$2,266.95	15.97%
Hennepin	SIFCO CUSTOM MACHINING (CUSTOM TOOL & MFG)	\$522.00	14,795	\$398.09	-23.74%
RAMSEY	SIGN-ZONE, INC.	\$516.02	5,500	\$332.18	-35.63%
RAMSEY	SILGAN CONTAINERS MANUFACTURING CO	\$783.11	10,566	\$476.97	-39.09%
Hennepin	SMYTH COMPANIES INC MINNEAPOLIS	\$392.40	19,410	\$467.68	19.19%
RAMSEY	SMYTH COMPANIES INC ST. PAUL	\$1,392.17	31,098	\$1,063.75	-23.59%
RAMSEY	SNELLING COLLISION SERVICE INC	\$268.15	1,550	\$219.30	-18.22%
RAMSEY	SOO LINE RAILROAD CO	\$286.06	1,760	\$225.30	-21.24%
RAMSEY	SOURCE INC	\$393.66	3,300	\$269.31	-31.59%
Anoka	SPEC PLATING	2570.40	692,544	\$5,140.80	100.00%
RAMSEY	SPECIALITY PRECISION MACHINING	\$1,015.50	18,400	\$700.85	-30.98%
Anoka	SQUID INK MFG, INC.	522.00	8,800	\$426.50	-18.30%
RAMSEY	ST JOSEPHS HOSPITAL	\$465.08	4,584	\$306.01	-34.20%
RAMSEY	ST JUDE MEDICAL INC - LILLEHEI FACILITY	\$547.89	6,073	\$348.56	-36.38%
Hennepin	ST JUDE MEDICAL, DAIG DIVISION	\$262.80	3,445	\$226.95	-13.64%
Hennepin	ST JUDE MEDICAL-ATG DIVISION	\$262.80	1,950	\$204.40	-22.22%
RAMSEY	ST PAUL CITY OF TRAFFIC OPERATIONS	\$652.13	7,947	\$402.12	-38.34%
RAMSEY	ST. PAUL METALCRAFT, INC.	\$1,174.49	23,760	\$854.04	-27.28%
Hennepin	STARKEY LABS	\$262.80	2,590	\$214.05	-18.55%
Hennepin	STATES ELECTRIC MANUFACTURING CO	\$262.80	2,748	\$216.44	-17.64%
Hennepin	STELLAR TECHNOLOGIES INC	\$392.40	6,850	\$370.77	-5.51%
RAMSEY	STENCIL CUTTING AND SUPPLY	\$393.66	3,300	\$269.31	-31.59%
Hennepin	STEVEN CABINETS INC	\$262.80	3,850	\$233.05	-11.32%
Washington	Stillwater Motor Company	\$221.64	2,460	\$212.09	-4.31%
RAMSEY	SUN CHEMICAL	\$229.77	1,100	\$191.59	-16.62%

County	Facility Name	2004 Fee Amount	Cap Adjusted Pounds	Predicted Fee	(+/-)
Hennepin	SUNRISE PAINTING & WALL COVERING	\$392.40	8,250	\$299.40	-23.70%
Carver	SUPER RADIATOR COILS	\$915.00	33,550	\$1,133.83	23.92%
Hennepin	SUPERIOR FORD INC	\$262.80	2,070	\$206.21	-21.53%
Hennepin	SUPERIOR PLATING INC	\$5,216.40	386,150	\$5,997.76	14.98%
Anoka	SUPERIOR STRIPING INC	414.00	27,824	\$594.56	43.61%
RAMSEY	SURGICAL TECHNOLOGIES INC	\$162.84	550	\$183.29	12.56%
Hennepin	SURMODICS INC	\$1,044.00	27,535	\$961.92	-7.86%
Hennepin	SURMODICS INC - RIVER BLUFF	\$262.80	4,430	\$241.80	-7.99%
Hennepin	SWANSON & YOUNGDALE INC	\$1,044.00	26,425	\$930.20	-10.90%
Anoka	SYNERGY GRAPHICS, INC.	295.20	2,880	\$257.31	-12.84%
Anoka	SYNOVIS IS	324.00	1,872	\$228.50	-29.48%
RAMSEY	SYNOVIS SURGICAL INNOVATIONS	\$5,691.41	155,761	\$4,626.49	-18.71%
Hennepin	TARGET PRINTING SERVICES	\$392.40	9,240	\$314.33	-19.90%
Anoka	TECHNICAL FINISHING SERVICES, INC.	446.40	5,720	\$338.47	-24.18%
Carver	TECHNICAL MARKETING COMPANY(TMC)	\$275.00	3,850	\$233.05	-15.25%
Hennepin	TECHNICAL PLATING INC	\$1,954.80	16,500	\$646.55	-66.92%
Hennepin	TECHNICAL RESIN PACKAGING INC	\$522.00	28,050	\$597.97	14.55%
Hennepin	TEMROC METALS INC	\$1,954.80	210,800	\$3,353.65	71.56%
Hennepin	TENNANT COMPANY	\$392.40	19,015	\$461.73	17.67%
RAMSEY	THE HOME DEPOT #2801	\$294.59	1,860	\$228.16	-22.55%
Hennepin	THERMO KING CORPORATION	\$262.80	1,326	\$212.90	-18.99%
Hennepin	THIELE TECHNOLOGIES INC	\$262.80	1,750	\$201.39	-23.37%
Hennepin	TIMESAVERS INC	\$522.00	8,200	\$409.35	-21.58%
Anoka	TIRO INDUSTRIES LLC	295.20	2,200	\$237.87	-19.42%
Hennepin	TONKA DRY CLEANERS	\$392.40	2,948	\$259.25	-33.93%
RAMSEY	TOTAL TOOL	\$549.95	5,110	\$321.04	-41.62%
RAMSEY	TOUSLEY FORD INC	\$268.15	1,550	\$219.30	-18.22%
Hennepin	TOWN AND COUNTRY DODGE	\$262.80	3,660	\$230.19	-12.41%
Hennepin	TRC CIRCUITS	\$1,044.00	53,710	\$984.89	-5.66%
RAMSEY	TREATING SERVICES OF MINNESOTA, LLC	\$1,404.09	31,500	\$1,075.24	-23.42%
RAMSEY	TRIKE SHOP THE	\$494.89	5,120	\$321.32	-35.07%
RAMSEY	TRUCK UTILITIES INC.	\$585.27	6,745	\$367.77	-37.16%
Hennepin	TURCK INC.	\$262.80	3,160	\$222.65	-15.28%
RAMSEY	TURNING INC	\$302.26	1,950	\$230.73	-23.67%
RAMSEY	TWIN CITY AUTO ELECTRIC INC	\$388.10	3,200	\$266.45	-31.34%
Hennepin	TWIN CITY CHROMIUM PLATING CO	\$1,954.80	34,100	\$1,149.54	-41.19%
Hennepin	TWIN CITY OPTICAL CO INC	\$392.40	4,912	\$315.39	-19.63%
Hennepin	TWIN STAR ELECTRONICS INC	\$262.80	3,200	\$223.25	-15.05%
RAMSEY	U S FILTER RECOVERY SERVICES INC	\$11,114.88	2,000,000	\$22,229.76	100.00%
RAMSEY	U V COLOR INC	\$1,098.85	21,210	\$781.16	-28.91%

County	Facility Name	2004 Fee Amount	Cap Adjusted Pounds	Predicted Fee	(%)
RAMSEY	U.S. 1.99 CLEANERS	\$809.57	4,240	\$296.17	-63.42%
Hennepin	ULTRA OPTICS	\$392.40	7,150	\$379.34	-3.33%
RAMSEY	UNICIRCUIT-ROSEVILLE	\$7,817.61	54,060	\$1,719.98	-78.00%
Hennepin	UNIMATIC INC	\$262.80	4,400	\$241.35	-8.16%
RAMSEY	UNITED HOSPITAL INC.	\$1,454.87	33,212	\$1,124.17	-22.73%
Hennepin	UNITED PARCEL SERVICE	\$522.00	33,897	\$686.13	31.44%
Hennepin	UNITED PARCEL SERVICE	\$262.80	3,285	\$224.53	-14.56%
RAMSEY	UNITED SCIENTIFIC INC	\$729.05	9,330	\$441.64	-39.42%
Anoka	UNITY HOSPITAL	1850.40	15,392	\$614.89	-66.77%
RAMSEY	UNIVAR USA INC	\$5,934.28	234,823	\$6,886.01	16.04%
Hennepin	UNIVERSAL CIRCUITS INC	\$2,610.00	619,660	\$5,220.00	100.00%
Hennepin	UNIVERSAL PLATING INC	\$3,909.60	47,000	\$1,518.21	-61.17%
RAMSEY	UNIVERSITY OF MINNESOTA	\$1,532.63	35,221	\$1,181.58	-22.90%
Hennepin	UNIVERSITY OF MINNESOTA FTCEM	\$1,044.00	17,014	\$661.24	-36.66%
Hennepin	UNIVERSITY OF MINNESOTA MINNEAPOLIS CAMPUS	\$1,954.80	192,353	\$3,075.49	57.33%
Hennepin	UNIVERSITY OF MINNESOTA STORES AND PRINTING GRAPHI	\$522.00	18,817	\$458.74	-12.12%
RAMSEY	UNIVERSITY OF ST THOMAS	\$903.12	10,299	\$469.34	-48.03%
Hennepin	UPSHER SMITH LABORATORIES INC	\$1,044.00	36,250	\$1,210.99	16.00%
Hennepin	UPSHER SMITH LABS	\$1,044.00	11,000	\$489.37	-53.13%
Hennepin	UROLOGIX INC	\$392.40	6,000	\$346.47	-11.70%
Hennepin	US 2.79 CLEANERS	\$262.80	2,560	\$213.60	-18.72%
Hennepin	US AIR FORCE RESERVE	\$262.80	1,696	\$200.57	-23.68%
RAMSEY	US ARMY TC ARMY AMMUNITION PLANT	\$834.90	12,312	\$526.86	-36.89%
RAMSEY	UV COLOR WEST	\$363.07	2,750	\$253.59	-30.15%
Washington	Valley Sales of Hastings Inc	\$197.96	1,940	\$204.25	3.18%
Hennepin	VALMONT APPLIED COATING TECHNOLOGY	\$1,044.00	8,718	\$424.15	-59.37%
Hennepin	VALSPAR CORPORATION (THE)	\$1,044.00	94,050	\$1,593.18	52.60%
Hennepin	VALSPAR CORPORATION INDUSTRIAL LAB	\$262.80	1,100	\$206.44	-21.45%
Hennepin	VALSPAR E-COAT LAB	\$392.40	5,500	\$332.18	-15.35%
RAMSEY	VEECO COMPOUND SEMICONDUCTOR INC.	\$363.63	2,760	\$253.88	-30.18%
Hennepin	VERSA DIE CAST INC	\$262.80	3,210	\$223.40	-14.99%
RAMSEY	VERSA IRON & MACHINE	\$375.31	2,970	\$259.88	-30.76%
Hennepin	VETERANS AFFAIRS MEDICAL CENTER	\$1,044.00	15,685	\$623.27	-40.30%
Hennepin	VIBES TECHNOLOGIES	\$262.80	1,915	\$203.88	-22.42%
Hennepin	VIC'S BROOKLYN PARK COLLISION	\$262.80	3,140	\$222.35	-15.39%
RAMSEY	VIKING DRILL AND TOOL INC	\$7,310.75	29,900	\$1,029.51	-85.92%
Hennepin	VILLAGE CHEVROLET CO	\$262.80	2,680	\$215.41	-18.03%
Hennepin	VILLAGE CLEANERS	\$262.80	1,400	\$215.01	-18.18%

County	Facility Name	2004 Fee Amount	Cap Adjusted Pounds	Predicted Fee	(%)
Anoka	VISION-EASE LENS	1731.60	50,128	\$1,607.61	-7.16%
RAMSEY	VISTA TECHNOLOGIES LLC	\$485.43	4,950	\$316.47	-34.81%
Anoka	VISUAL IMPACT SIGNS INC	802.80	4,776	\$311.49	-61.20%
RAMSEY	VITRAN EXPRESS	\$455.40	4,410	\$301.03	-33.90%
RAMSEY	VOMELA SPECIALTY COMPANY	\$983.16	17,310	\$669.70	-31.88%
Carver	WACONIA MANUFACTURING, INC	\$458.00	12,300	\$360.47	-21.29%
Anoka	WAGAMON BROS INC	414.00	3,144	\$264.85	-36.03%
Hennepin	WAGNER SPRAY TECH	\$392.40	6,450	\$359.33	-8.43%
RAMSEY	WALDORF CORPORATION	\$3,453.16	101,395	\$3,072.77	-11.02%
Hennepin	WALDORF NEVENS CLEANERS	\$392.40	5,620	\$335.61	-14.47%
Hennepin	WALSER FORD	\$262.80	1,000	\$203.58	-22.53%
Anoka	WALTEK INC	133.20	512	\$182.72	37.18%
Hennepin	WANNER ENGINEERING INC	\$1,044.00	81,200	\$1,399.41	34.04%
Washington	Washington County	\$112.75	500	\$182.54	61.90%
Anoka	WASTE MANAGEMENT BLAINE	295.20	3,896	\$233.75	-20.82%
RAMSEY	WATER GREMLIN CO. INC	\$1,173.19	23,716	\$852.78	-27.31%
RAMSEY	WAYNE-VAL AUTO BODY	\$229.77	1,100	\$191.59	-16.62%
Hennepin	WAYZATA HOME LAUNDRY & DRY CLEANERS	\$262.80	3,390	\$226.12	-13.96%
Hennepin	WEATHER-RITE	\$262.80	100	\$177.86	-32.32%
Hennepin	WEB LABEL LTD	\$262.80	2,500	\$212.70	-19.06%
Hennepin	WELLINGTON WINDOWS	\$262.80	1,700	\$200.63	-23.66%
Anoka	WENDELL'S	770.40	3,664	\$279.71	-63.69%
RAMSEY	WHITE BEAR DODGE INC	\$128.54	400	\$181.03	40.84%
RAMSEY	WHITE BEAR LAKE PONTIAC GMC TRUCKS	\$510.47	5,400	\$329.33	-35.49%
RAMSEY	WHITE BEAR LINCOLN MERCURY	\$393.66	3,300	\$269.31	-31.59%
RAMSEY	WHITE WAY CLEANERS	\$880.22	5,830	\$341.62	-61.19%
RAMSEY	WOLKERSTORFER COMPANY INC	\$3,553.99	102,060	\$3,091.77	-13.01%
Hennepin	XCEL ENERGY CHESTNUT HW STORAGE FACILITY	\$1,044.00	49,378	\$919.57	-11.92%
Hennepin	XCEL ENERGY CHESTNUT SERVICE CENTER	\$522.00	20,356	\$481.95	-7.67%
Hennepin	XCEL ENERGY MAPLE GROVE	\$1,954.80	101,599	\$1,707.01	-12.68%
Anoka	YALE MATERIALS HANDLING - MN, INC.	295.20	3,296	\$224.70	-23.88%
Hennepin	ZALK STEEL & SUPPLY COMPANY	\$522.00	14,300	\$583.68	11.82%
Hennepin	ZANASI USA	\$262.80	2,000	\$205.16	-21.93%
Hennepin	ZENITH PRODUCTS COMPANY	\$262.80	3,130	\$222.20	-15.45%
Hennepin	ZOMAX INCORPORATED	\$392.40	19,300	\$466.02	18.76%

Appendix 3

Mailings, Meeting Invitations and Fact Sheets





Minnesota Pollution Control Agency

November 22, 2004

RE: Revised Rule - Hazardous Waste Fee Formula

Dear Minnesota Business:

There are changes to the Hazardous Waste Fee Rule being considered that may affect you. Enclosed for your review is a fact sheet describing the proposed changes.

The Minnesota Legislature recently directed the Minnesota Pollution Control Agency (MPCA) (2003 Session Laws 128, Article 2 Section 55) to make several changes that affect hazardous waste fees. The MPCA is expected to:

- Continue to collect revenue authorized by the Hazardous Waste Tax, which sunset on January 1, 2004;
- Collect the total amount of fee (and incorporated tax) as appropriated by the Legislature and;
- Evaluate the existing fee rules and make changes needed to facilitate the collection of a fee and tax using a single structure.

The MPCA is in the information gathering and brain-storming phase of revising the hazardous waste fee rules. Revised fee rules will likely involve revising the formula for calculating an individual generator's fee in Minn. R. 7046.0060.

The MPCA invites you to participate in the fee revision process by providing us with your ideas and comments. You can do this in several ways:

- ✓ **Attend** one of several scheduled public information meetings:

Date and Time	Location	Address
Tuesday, December 14, 2004 3:00 – 5:00 p.m.	Blue Earth County Library, Mankato	100 East Main, Mankato, MN Conference Room
Friday, December 17, 2004 1:00 – 3:00 p.m.	MPCA Central Offices, St. Paul	520 Lafayette Rd N, St Paul, MN Lower Level Board Room
Tuesday, December 21, 2004 3:00 – 5:00 p.m.	MPCA Regional Office, Brainerd/Baxter	7678 College Road, Baxter, MN Conference Room, Suite 105

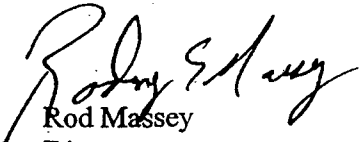
November 22, 2004

- ✓ **Learn more and give us your comments** electronically at the MPCA Web site at: www.pca.state.mn.us/waste/hwrules.html.
- ✓ **Listen to our toll-free 24-hour recorded help line** at (800) 677-4169. If you have additional questions or comments, you can also be transferred to MPCA staff between 8:00 a.m. and 4:30 p.m. Monday through Friday using this number.
- ✓ **Write to us at:** MPCA, Hazardous Waste Fee Rule Comments, 520 Lafayette Rd. N., St. Paul, Minnesota 55155-4194.

The MPCA anticipates a *draft* revised fee rule will be published in the State Register in March 2005. Meanwhile, **fees for waste generated in 2004 will be based on the existing fee formula.** Fees for waste generated in 2005 will be based on the revised rule.

If you have any questions or comments about the rule revision process for the fee, or the MPCA's proposed strategy, consider one of the methods described above first. You can also feel free to contact Matt Herman at (651) 296-6603 or e-mail: matthew.herman@pca.state.mn.us.

Sincerely,



Rod Massey
Director
Operational Support Division

RM/MH:kb

Enclosure



Minnesota
Pollution
Control
Agency

Hazardous Waste Annual Fee & Generator (Superfund) Tax: Fee Rule Revisions

Waste/Hazardous Waste #0.13, November, 2004

Land Policy Unit

The MPCA is directed by the Minnesota Legislature to collect hazardous waste fees and the Hazardous Waste Tax. The amount collected is set by the Legislature.

The Legislature recently directed the MPCA to make several changes that affect hazardous waste fees. The MPCA is expected to:

- Continue to collect revenue authorized by the Hazardous Waste Tax, which sunset on January 1, 2004.
- Collect the total amount of fee (and incorporated tax) that is appropriated by the Legislature, and
- Evaluate the existing fee rules and make changes needed for fee and tax collection using a single structure.

For more information about the fee rule revision, visit the MPCA Web site at:
www.pca.state.mn.us/waste/waste/hwrules.html. or

Call our toll-free 24-hour recorded help line at (800) 677-4169.

The MPCA is revising hazardous waste fee rules found in Minn. Rules., Ch. 7046 to address the sunset of the Hazardous Waste Tax on January 1, 2004, and to meet expectations from the Minnesota Legislature.

The MPCA is in the information gathering and brainstorming phase of revising these rules. This will likely involve revising the formula for calculating an individual generator's fee.

The fee for waste generated in 2004 will be based on the existing fee structure. Fees for waste generated in 2005 will be based on the revised rule.

Fee strategies

The strategy described in this fact sheet is one option for revising the hazardous waste fee formula. Presentation of this strategy is intended to solicit comments and ideas in the development of a revised fee formula.

MPCA staff used several assumptions and goals in developing a strategy for revising the existing fee structure. MPCA staff believes a revised fee structure should be:

- efficient to administer;
- equitable to those affected by the rule; and,
- a reliable tool in collecting the target amount appropriated by the Legislature.

For all fee strategies considered, there are several working assumptions:

- Only wastes counted toward generator size, as described by Minn. Rules, Ch. 7045.0206, subp. 5 are subject to a fee. The current fee structure uses different criteria to determine the generator fee.
- All waste is subject to the same fee rate, regardless of management method or the amount of waste. Research has shown that the hazardous waste fee does not drive waste management decisions.

- Funding for various MPCA programs and activities required by rule or regulation comes from the 'State Environmental Fund.' This account is partially funded by generator fees. The hazardous waste fee is not a fee for service – a change from past funding concepts.

- Any new fee strategy can accommodate changes to the mechanism for collecting fees from metro generators.

The current mechanism for collection of fees from metro generators involves the application of a statewide program fee (SWPF). The SWPF is applied to fees assessed by the various metro area county programs. Subsequently, the county remits the SWPF to the State.

Base fee + per pound rate strategy

The 'base fee + per pound rate' strategy would be applied using the steps described below.

1. Divide the appropriated target (T) into three sectors: Treatment, storage and disposal facilities (TSDs) (f), metro generators (m), and non-metro generators (n). The target appropriation (T) is the sum of all three sectors:

$$T = f + m + n$$

2. Assign a percentage of the total that each sector pays based on the percentage of the total that the sector has historically paid. Keep in mind, the tax is now incorporated into the fee.

Use these percentages to calculate the amount of the total that each sector pays.



Waste/Hazardous Waste/0.13, November 2004

$$f = 0.19 (T)$$

$$n = [T - (T \cdot 0.19)] \cdot 0.55$$

$$m = [T - (T \cdot 0.19)] \cdot 0.45$$

- Assess fees to collect the TSD target amount (f) by determining a multiplication ratio (r). The ratio is used to calculate the current fee amount by multiplying the ratio by the baseline fee amount (e) in the existing fee rules for TSDs (Minn. Rules, Ch. 7046.0020).

$$f = r \cdot e \text{ or}$$

$$[0.19 (T)] = r \cdot e$$

- Assess fees to collect the metro generator target amount (m) from metro generators in a non-specified way. Either the existing concept of a SWPF or the non-Metro strategy can be applied and used with this strategy.
- Assess fees to collect the non-Metro generator target amount (n) using a fee formula. The proposed formula establishes a base fee (b) of \$235.00 for all generators plus a per pound rate (p) for each pound of hazardous waste generated by small and large quantity generators (SQGs and LQGs). Very small quantity generators (VSQGs) are assessed only the flat fee of \$235.00.

To establish the per pound rate (p), the amount of money generated from assessing a base fee to all non-metro generators is subtracted from the total non-metro generator target, and then dividing this by the total number of pounds of waste generated by SQGs and LQGs.

Applying this concept to the formula below, the number of non-metro VSQGs (w), SQGs (x) and LQGs (y) are multiplied by the base fee (b) and subtracted from the non-metro generator target amount (n). This is then divided by the total amount of waste generated in the non-Metro area (q) less the amount of waste generated by VSQGs (v).

$$p = \frac{n - [b(w + x + y)]}{(q - v)}$$

How will upcoming changes affect you?

Fees for waste generated in 2004 will be based on the existing fee structure. Fees for waste generated in 2005 will be based on a new formula.

Using the strategy outlined in this fact sheet, the overall fees for SQGs, LQGs and TSDs for waste generated in 2004 and 2005 would increase. VSQGs would not see an increase using this strategy.

This increase and redistribution will occur with any fee strategy selected for several reasons:

- The new fee strategy includes the tax that has sunset – these two formulas are significantly different.
- In the past, there was disparity between taxes paid by metro and non-metro generators. Specifically, metro generators paid more, with the bulk of the metro portion being paid by only a few generators.
- Finally, the MPCA did not collect the entire appropriation amount that was authorized by the Legislature in the past. The Legislature, based on a Legislative Auditor's Report, directed the MPCA to begin collecting the entire amount appropriated under the law.

The following table illustrates the application of this strategy to general categories of non-metro generators.

Generator size/ amount per year	Calculation	Fee amount using strategy
VSQG (100 – 2640 lbs.)	Flat Fee	\$235.00
Smallest SQG (2641 lbs.)	\$235.00 + \$214.19	\$449.19
Median SQG (5500 lbs.)	\$235.00 + \$441.10	\$676.10
Largest SQG (26,400 lbs.)	\$235.00 + \$2,117.28	\$2,352.28
Smallest LQG (30,000 lbs.)	\$235.00 + \$2,406.00	\$2,641.00
Median LQG (88,123 lbs.)	\$235.00 + \$7,067.47	\$7,302.47
LQG (237,550 lbs.)	\$235.00+\$19,051.51	\$19,286.51

Get involved in the fee rule revision process

The MPCA invites you to participate in the fee revision process by providing us with your ideas and comments. You can do this in several ways:

- Attend one of the scheduled public information meetings;
- Learn more and give us your comments electronically at the MPCA Web site at: www.pca.state.mn.us/waste/hwrules.html;
- Listen to our toll-free 24-hour recorded help line at (800) 677-4169; or,
- Write to: MPCA, Hazardous Waste Fee Rule Comments, 520 Lafayette Rd. N., St. Paul, Minnesota 55155-4194.



Minnesota
Pollution
Control
Agency

Changes in the Hazardous Waste Annual Fee and Generator (Superfund) Tax

Waste/Hazardous Waste #0.12, Rev. December 2004

These MPCA services are partially funded by generator license fees:

- fact sheets
- workshops
- technical assistance
- presentations by MPCA staff
- inspections
- enforcement actions
- SQG & LQG manifest tracking
- rule amendments
- facility permitting

For more information about the change to annual fees, call the Hazardous Waste 24-hour recorded helpline at (800) 677-4169 or (651) 296-2412.

For more information about complying with hazardous waste requirements, visit the MPCA Web site at <http://www.pca.state.mn.us/waste/pubs/business.html>

Annual fees for hazardous waste generators and facilities are increasing for the 2004 billing period. Future fees and billing will also change because of legislative changes, rule changes and changes in the number of generators and facilities. **This is not a bill or invoice.** You will be billed separately in about two months.

Why are the fees increasing?

For the 2004 billing period, annual fees are increasing for a number of reasons. First, the fees reflect part of the costs associated with running the Hazardous Waste Program. The number of staff in the program has decreased over the past ten years from 71 Full-Time Equivalents (FTEs) in 1996 to 32 FTEs today. Despite the reduction, the costs associated with the remaining staff continue to rise. This accounts for some of the increase in annual fees.

Next, the Hazardous Waste Tax is no longer a separate revenue stream. The Minnesota Legislature directed the Minnesota Pollution Control Agency (MPCA) to collect the tax revenue through the existing fee structure.

Finally, a decrease in the number of generators and facilities subject to the fee contributes to the increase in the annual fee.

History

The MPCA's Hazardous Waste Program is designed to protect the public and the environment from the effects of improper management of hazardous wastes.

In 1983, the Legislature chose to finance about half of the MPCA's Hazardous Waste Program with fees charged to businesses governed by the program (Minn. Stat., Ch.

116.12). The balance of program funding comes from the U.S. Environmental Protection Agency and Minnesota's General Fund and Solid Waste Management Tax.

In 1993, the Legislature established the Hazardous Waste Generator Tax, also called the Superfund Tax, for the oversight and cleanup of designated contaminated sites (Minn. Stat., Ch. 115B.22). Like the annual fee, this tax is assessed to generators of hazardous waste and is based on the amount of waste generated and how the waste is managed.

The Legislature recently directed the MPCA to make several changes that affect hazardous waste fees (2003 Session Laws 128, Article 2, Section 55). The MPCA is expected to:

- continue to collect revenue authorized by the Hazardous Waste Tax, which did sunset on January 1, 2004;
- collect the total fee amount (and incorporated tax) appropriated by the Legislature; and
- evaluate the existing fee rules and make changes necessary for the collection of a fee and tax using a single structure.

Fee increases

The Legislature establishes a specific level of funding to be collected by the MPCA. The funds are collected from annual fees assessed to hazardous waste generators and facilities across Minnesota, as required in Minn. Stat., Ch. 116.12.

A fee formula in Minn. Rules; Ch. 7046.0060 specifies how to calculate annual fees so the amount set by the Legislature can be collected.



Each year, the fee formula is used to calculate fee rates for the billing period (based on wastes generated during the previous calendar year). This formula takes several factors into account that include:

- how much waste is generated (larger generators pay more);
- how waste is managed (more environmentally beneficial management methods are rewarded);
- how much staff time is spent in different areas of the program; and
- how many generators and facilities are in the Hazardous Waste Program.

Very small quantity generators (VSQGs) that generate more than 100 pounds of hazardous waste per year, but less than 2,640 pounds of hazardous waste per year, are subject to a flat fee.

The VSQG flat fee for the 2003 billing period was \$185 and the flat tax was \$50.00. The VSQG flat fee for the 2004 billing period will be \$420. The hazardous waste tax is no longer collected separately. The revenue previously collected from this tax is being collected based on the fee formula.

Annual fees for **small quantity generators (SQGs)** and **large quantity generators (LQGs)** are calculated based on the quantity of hazardous waste generated per year (the per-gallon rate), the management method, and a statewide program fee (SWPF), which is paid by all generators. As with VSQGs, the revenue previously collected by the hazardous waste tax is being collected through the fee formula.

The per-gallon rate was \$1.55 for the 2003 billing period. The rate will be \$2.75 for the 2004 billing period. The SWPF (a percentage calculation) was 34 percent for the 2003 billing period. It will be 72 percent for the 2004 billing period.

Billing Period	VSQG Flat Fee and Tax	SQG/LQG Per-gallon Rate	Statewide Program Fee
2003	\$185 + \$50	\$1.55	34%
2004	\$420	\$2.75	72%

Annual fees for **permitted Treatment, Storage and Disposal (TSD) facilities** are calculated based on the fee in Minnesota rules for the specific facility activity. The baseline is multiplied by the factor calculated from the fee formula. To get the annual facility fees for the 2004 billing period, the baseline fees will be multiplied by 2.54.

What is the MPCA doing to address the fee increases?

The MPCA is in the process of making changes to the annual fee structure. One major change to the annual fee structure is based on guidance from the 2003 Legislature.

You can help us develop the new fee rules by taking an active role in the rule-writing and revision process. For more information on the Hazardous Waste Fee Rule revisions, go to <http://www.pca.state.mn.us/waste/hwrules.html>. You can also call Matt Herman at (651) 296-6603 or e-mail him at matthew.herman@state.mn.us.

What can I do to reduce my fees?

The MPCA encourages pollution-prevention strategies to reduce the amount of waste generated and the cost associated with generation of that waste.

Any of the following organizations can help small businesses find ways to reduce the amount of hazardous waste generated, as well as identify other pollution-prevention and waste-reduction opportunities:

- Minn. Technical Assistance Program** (612) 624-1300
<http://www.mntap.umn.edu/> (800) 247-0015
- MPCA Small Business Assistance Program** (651) 282-6143
http://www.pca.state.mn.us/programs/sbap_p.html (800) 657-3938
- Minn. Office of Environmental Assistance** (651) 296-3417
<http://www.moea.state.mn.us/p2/> (800) 657-3843
- Minnesota Waste Wise** (651) 292-4650
<http://www.mnwastewise.org/> (800) 821-2230

Comments and complaints may be registered online at <http://www.pca.state.mn.us/complaints.html> or by calling the Hazardous Waste 24-hour recorded helpline at (800) 677-4169 or (651) 296-2412, and pressing zero.



Minnesota Pollution Control Agency

August 17, 2005

RE: Revised Rule – State Hazardous Waste Fee Formula

Dear Metro Area Minnesota Business:

The Minnesota Legislature directed the Minnesota Pollution Control Agency (MPCA) (2003 Session Laws 128, Article 2 Section 55) to make several changes that affect state hazardous waste fees. The MPCA has been directed to:

- Collect the total amount appropriated by the Legislature; and
- Evaluate the existing fee rules and make necessary changes.

The MPCA is now considering revisions to the Hazardous Waste Fee Rule that may affect future state fees charged to hazardous wastes generators. This process will not affect any fees charged by your metropolitan county.

The MPCA would like your input on a proposed formula for calculating the annual state hazardous waste fee. At the meetings discussed below, we will present the current MPCA proposal, which will assess state fees to metropolitan and non-metropolitan generators using two separate formulas. The formulas will calculate a base fee that every generator will pay, and also a quantity rate that Small and Large Quantity Generators will also pay. The calculated base fee will be a flat fee for all Very Small Quantity Generators. Treatment, storage and disposal facilities will continue to be charged fees using the current rule structure.

The table below provides an example of what metropolitan area generators would pay to the State under the proposed fee system.

SIZE	Pounds Generated	Potential State Fee
VSQG	101-2640	175.00
SQG	2641	225.12
SQG	15,000	459.67
SQG	20,000	554.57
LQG	50,000	1,123.91
LQG	500,000	9,664.13
LQG	1,000,000	19,153.26
LQG	2,000,000	38,131.52
LQG	5,000,000	38,131.52

Revised Rule – Hazardous Waste Fee Formula

Page 2

August 17, 2005

The MPCA invites you to participate in the fee rule revision process. Please help us by providing your ideas and comments. You can do this in several ways:

- ✓ **Attend** one of the scheduled public information meetings:

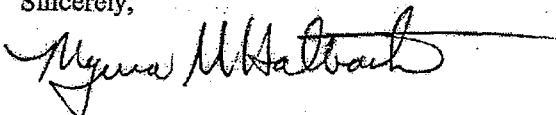
Date and Time	Location	Address
September 8, 2005 1:00-4:00 pm	MPCA -St Paul, Board Room	520 Lafayette Rd North St. Paul, MN 55155
September 15, 2005 4:00-7:00 pm	MPCA -St Paul, Board Room	520 Lafayette Rd North St. Paul, MN 55155

- ✓ **Learn more and submit your comments** electronically at the MPCA Web site at:
www.pca.state.mn.us/waste/hwrules.html.
- ✓ **Listen to our 24-hour recorded help line** at (651) 296-2412 or toll-free at: (800) 677-4169. If you have additional questions or comments, you can also be transferred to MPCA staff between 8:00 a.m. and 4:30 p.m. Monday through Friday using this number.
- ✓ **Write to us at:** MPCA, Hazardous Waste Fee Rule Comments, 520 Lafayette Road North, St. Paul, Minnesota 55155-4194.

The MPCA anticipates publishing a *draft* revised fee rule in the State Register in the fall of 2005. We would like to incorporate your suggestions and address concerns prior to this publication, if possible.

If you have any questions or comments about the Hazardous Waste Fee Rule Revision process or the MPCA's proposed option, please use one of the options described above. Alternatively, you may contact Matt Herman by phone at (651) 296-6603, or e-mail at matthew.herman@pca.state.mn.us.

Sincerely,



Myrna M. Halbach, P.E.
Assistant Division Director
Industrial Division

MMH/MH:jal

cc: Metro Area County Staff



Minnesota
Pollution
Control
Agency

Changes to the Hazardous Waste Annual Fee Formula Rules

Waste/Hazardous Waste #0.14, December 2005

These MPCA services are partially funded by generator license fees:

- fact sheets
- workshops
- technical assistance
- presentations by MPCA staff
- inspections and enforcement
- facility permitting
- SQG & LQG manifest tracking
- rule amendments
- other environmental protection programs

For more information about the change to annual fees, call the Hazardous Waste 24-hour recorded helpline at (651) 296-2412 or (800) 677-4169 outside the metro area.

For more information about complying with hazardous waste requirements, visit the MPCA Web site at <http://www.pca.state.mn.us/waste/pubs/business.html>.

The Minnesota Pollution Control Agency (MPCA) is in the final stages of revising the hazardous waste fee formula rules. This fact sheet is designed to provide information related to the proposed formula and how it may affect you and your business. This information pertains to all metropolitan and nonmetropolitan area hazardous waste generators and all permitted Treatment, Storage and Disposal (TSD) facilities.

This is not a bill or invoice; you will receive your bill in a separate mailing.

The MPCA anticipates using the formula discussed in this fact sheet for the billing in the spring of 2006, however time constraints may require that we use the existing formula for that billing. Please feel free to contact agency staff for an update on this process.

Background

The Hazardous Waste Program of the MPCA is designed to protect the public and the environment from the effects of improper management of hazardous wastes.

In 1983, the Minnesota Legislature chose to finance about half of the MPCA's Hazardous Waste Program with fees charged to businesses governed by the program (Minn. Stat. Ch. 116.12). The balance of program funding comes from the U.S. Environmental Protection Agency.

In 1993, the legislature established the Hazardous Waste Generator Tax (tax), also called the Superfund Tax. Like the annual fee, this tax is assessed to generators of hazardous waste and is based on the amount of waste generated.

In 2003, the legislature allowed the tax to sunset and directed the MPCA to collect the previously authorized tax revenue using the existing hazardous waste fee formula (2003 Session Laws 128, Article 2, Section 55).

The collection of this additional revenue, using the existing fee formula caused several problems; most notably, a significant shift in payments from generators to TSDs, and from metropolitan-area generators to nonmetropolitan-area generators.

Why is the formula changing?

The fee formula is being modified to address the problems identified above, and to improve on a few key characteristics of the formula. The main goals of the rule revisions were to create a formula that is:

- reliable,
- simple,
- equitable and
- able to minimize the impact on small businesses

What affect will this new formula have on those who pay fees?

To assess the impact of the proposed formula, MPCA staff used data from the last billing cycle (2004) to assess what the fees would have been if the new system would have been used. Fee levels in future cycles may vary based on the number of generators and the amount of waste generated.

Overall, modeling indicates that the proposed fee formula changes will result in giving about 70% of all generators statewide a fee decrease. Due to the variability in the existing formula, a small number of



generators may see a large fee increase. MPCA staff has contacted these generators individually to make them aware of this change. The current modeling results show that, if used in the last billing cycle, the proposed formula would result in a \$150 Very Small Quantity Generator (VSQG) fee in the metro area and a \$350 VSQG fee in the nonmetro area.

This would represent a 17% decrease for over 2,000 nonmetro VSQGs, from the \$425 fee in 2004. The \$150 metro-area base fee would represent a fee increase for 1,872 metro-area generators and a fee decrease for 1,080 metro-area generators. In 2004, the average state fee charged to a metro-area VSQG was \$149.23.

The quantity rate for the metro area would have been \$0.018 per pound and \$0.081 per pound in the nonmetro area. This figure can be used to calculate the quantity fee that would be added to the base fee to calculate the annual fee charge for all Small Quantity Generators's (SQGs) and Large Quantity Generators (LQGs).

Annual fees for permitted Treatment, Storage and Disposal (TSD) facilities are calculated based on the fee in Minnesota rules for the specific activity. The baseline is multiplied by the factor calculated from the fee formula. To get the annual facility fees for the 2004 billing period, the baseline fees will be multiplied by 2.41.

How does the new formula calculate annual fees?

Under the proposed formula, generators would be responsible for paying 81% of the annual target and TSDs would pay 19%. The 81% that will be paid by generators is divided between metro-area generators and nonmetro-area generators, with metro-area generators paying 40% and 60% being collected from nonmetro-area generators.

Individual fees for TSDs are calculated using the existing formula; no changes are proposed to that section of the fee formula.

The proposed formula contains one fee calculation for metro-area generators and one for nonmetro-area generators. These calculations are done separately to acknowledge two very different scenarios. Both formulas generate a base fee and a quantity rate. VSQGs in the metro and nonmetro will pay only the calculated base fee, while SQGs and LQGs will pay an annual fee that is the sum of the base fee plus the quantity fee. The quantity fee is calculated by multiplying the quantity rate by a generator's total eligible pounds.

Under the proposed rule, only those wastes that count toward generator size determination under part 7045.0206 will be subject to the fee. Each pound of waste that is generated will be treated equally within the fee structure, up to the applicable quantity cap. Quantity fees will be charged on the first one million pounds, per generator, in the nonmetro area, and two million pounds, per generator, in the metro area. The proposed formula will no longer reduce the fees paid on waste streams based on how the waste is managed.

Was creating a new formula done with input from the public?

Five public meetings were held to get comments and input from stakeholders. Three meetings were held for nonmetro generators and TSDs, and two meetings were held for metro-area generators. The comments received at these meetings were used to create and select the proposed fee formula.

Where can I get more information?

For more information on the Hazardous Waste Fee Rule Revisions, or to view other rule related documents; go to <http://www.pca.state.mn.us/waste/hwrules.html> or contact Matt Herman (telephone 651/296-6603; e-mail matthew.herman@state.mn.us).

What can I do to reduce my fees?

The MPCA encourages pollution-prevention strategies to reduce the amount of waste generated and the cost associated with generation of that waste.

Any of the following organizations can help small businesses find ways to reduce the amount of hazardous waste generated, as well as identify other pollution-prevention and waste-reduction opportunities:

- Minn. Technical Assistance Program** (612) 624-1300
www.mntap.umn.edu/ (800) 247-0015
- MPCA Small Business Assistance Program** (651) 282-6143
www.pca.state.mn.us/programs/sbap_p.html (800) 657-3938
- Minnesota Waste Wise** (651) 292-4650
www.mnwastewise.org/ (800) 821-2230

Comments and complaints may be registered on-line at <http://www.pca.state.mn.us/complaints.html>, or by calling the Hazardous Waste 24-hour recorded helpline at (800) 677-4169 or (651) 296-2412 and pressing zero.

Appendix 4

Office of the Legislative Auditor

Evaluation Report Summary: PE02-02a

Minnesota Pollution Control Agency Funding



OFFICE OF THE LEGISLATIVE AUDITOR

STATE OF MINNESOTA

Minnesota Pollution Control Agency Funding

January 24, 2002

Major Findings:

- During the past 20 years, the main source of funding for the Minnesota Pollution Control Agency (MPCA) has shifted from the state General Fund to pollution-related fees and taxes.
- MPCA's staff-related costs per employee have recently increased faster than the agency's operating costs and inflation, although its situation is not unique among state agencies.
- Determining the proper method of funding MPCA will require legislators to make decisions regarding (1) the use of general versus "polluter pays" revenue sources, and (2) whether funding sources should be closely linked to the purposes for which they will be used.
- Minnesota's water quality fee revenues do not cover the cost of MPCA's water-related regulatory activities.
- Federal regulations will likely require MPCA to more comprehensively monitor water quality and address "nonpoint" water pollution, although MPCA is still determining specific strategies and their cost implications.

Funding MPCA involves finding the appropriate mix of general and "polluter pays" revenue sources.



Key Recommendations:

- The Legislature should clarify state laws that define which categories of MPCA activities should be funded with fees. It should then consider any adjustments in fee levels necessary to comply with these laws.
- To comply with current law, MPCA and the Legislature should address the imbalance between hazardous waste fee revenues and appropriations.
- MPCA should report to the 2003 Legislature on (1) plans for implementing and financing "total maximum daily load" requirements, and (2) what, if any, additional state-level strategies would cost-effectively help the state to avoid violations of federal standards for ozone and particulate matter.

Report Summary

The Minnesota Pollution Control Agency (MPCA) is the state's main environmental protection agency. It monitors and regulates air, water, and land pollution, works with citizens and businesses to prevent pollution, and helps to clean up polluted sites.

MPCA Has Faced Funding Challenges in Recent Years

When it was established in 1967, MPCA was funded solely with the state General Fund and federal funds. Since that time, pollution-based fees and taxes have comprised an increasing share of the agency's funding. For instance, facilities that emit air pollution, discharge wastewater, and treat or store hazardous waste are required to obtain permits from MPCA and pay annual fees. Since 1983, the percentage of MPCA's budget funded by the General Fund has declined from 50 percent to 13 percent.

During the past decade, MPCA has experienced a variety of funding challenges. The agency's water and hazardous waste fee revenues have not kept pace with inflation, and legislators have had to transfer money into these fee accounts on many occasions to address potential deficits. Water quality fees have not increased since 1992, and several MPCA proposals for fee increases have not been enacted by the Legislature.

Meanwhile, cost increases have strained MPCA's staffing resources. MPCA's average salary and fringe benefit cost per full-time-equivalent (FTE) employee increased 33 percent between fiscal years 1996 and 2001. This increase was higher than increases in MPCA's operating expenditures (20 percent), staffing costs in Minnesota state government (25 percent), state and local

staffing costs nationwide (21 percent), and consumer prices (13 percent).

The increased staffing costs are one reason that MPCA's staff size is projected to decline by mid-2003 to its lowest level in a decade. The agency projects a fiscal year 2003 staffing level of 719 FTE, down from a peak of 805 FTE in 1997. To help keep staff focused on higher priority activities, MPCA proposed and the 2001 Legislature authorized reallocations of staff among the agency's programs.

Decisions About MPCA's Funding Mix Will Depend on Key Policy Choices

In 2001, MPCA proposed "environmental tax reform" to address the agency's funding problems. For instance, the proposal would have placed revenues from solid waste management taxes and various other pollution-based charges into a fund that could be directed to high priority areas. Legislators did not pass MPCA's proposal but expressed an interest in continued discussion of funding options.

Determining the "right" mix of funding sources for MPCA will require legislative judgments about some fundamental issues. For instance, policy makers should consider the extent to which they prefer to fund MPCA with general or broad-based revenue sources, as compared to "polluter-based" sources. Pollution is often a reflection of society's general consumer preferences, and pollution control often results in broad-based public benefits—which may justify using the General Fund or other broad-based revenue sources to pay for some of MPCA's activities. Also, it may be necessary to use broad-based revenues to pay the cost of regulating types of pollution that are hard to trace to an individual source.

Cost increases, staffing cuts, and declines in some fee revenues have challenged MPCA in recent years.

On the other hand, it may be fairer to impose the governmental costs of pollution regulation directly on the polluters, where possible, through fees or other charges.¹ In this way, the prices of polluters' products might more directly reflect pollution's costs, and polluters might have some incentive to reduce pollution.

In addition, policy makers should consider whether it is important to have clear links between revenue sources and the purposes for which they will be used. The 2001 Legislature used revenues from the statewide solid waste tax to fill MPCA's funding gaps in a variety of program areas. This raised concerns among business and local government officials who had supported the tax's use for more limited purposes.² Likewise, MPCA proposed in 2001 to put various environmental fees and taxes (including the solid waste tax) into a fund that could be available for a variety of uses, not just uses directly related to the activities from which the revenues were raised. A flexible funding structure could allow the Legislature and MPCA to direct pollution-based revenues to priority areas, but it might also make it more difficult to relate fee and tax levels to the program costs they were originally designed to support.

Water and Hazardous Waste Fees Need Legislative and MPCA Attention

State law says that fees should be set at levels that do not significantly over-recover or under-recover the costs of providing services. However, water quality fee revenues cover less than

60 percent of MPCA's staff costs for water-related permitting, compliance monitoring, and enforcement—and this does not include administrative overhead costs or the costs of essential activities such as ambient water monitoring, permit-related rule development, environmental review, and technical assistance. In fact, the Legislature should clarify in law the types of costs that should be covered by MPCA fees, thus making it easier to determine the exact extent of compliance with the law.

Once the Legislature clarifies which costs should be covered by fees, it should consider changes in fee levels necessary to comply with these laws. Nationally, water quality fees vary widely, according to a survey of 13 states. For instance, Minnesota collected \$0.56 per capita in water quality fee revenues in fiscal year 2001, while two states (Washington and Wisconsin) collected more than \$1.50 per capita, and two states (Michigan and Kentucky) collected less than \$0.10 per capita.

MPCA has authority to raise hazardous waste fees administratively, unlike its authority regarding water and air quality fees. In fact, MPCA is required by law to set hazardous waste fees at a level that fully recovers the legislative appropriation for hazardous waste fee expenditures. In recent years, however, MPCA has not increased hazardous waste fees to cover the full appropriation—mainly, it says, because of legislator and industry concerns about fee levels. Thus, the Legislature has had to make up the shortfalls with funding from other sources. MPCA and the Legislature should consider fee

The Legislature needs to clarify which costs at MPCA should be covered by fee revenues.

¹ Some economists have suggested setting pollution taxes at levels that reflect pollution's "social" costs (such as health and environmental impacts), not just its governmental costs. But social costs are hard to measure, and they have not been the basis for most pollution taxes.

² On the other hand, half of solid waste tax revenues are deposited in the state General Fund, where they can be used for a variety of purposes.

increases or statutory changes to ensure compliance with the hazardous waste fee law.

plans for implementing these requirements (known as "total daily maximum load" requirements).

MPCA Should Clarify Strategies for Addressing "Emerging" Pollution Issues

Some emerging pollution control issues might require new funding (or new funding sources), but it is too early to tell. For instance, federal regulations will probably require MPCA to do a more comprehensive job of identifying and addressing polluted waters, partly through greater emphasis on "nonpoint" pollution. But federal and state rules are still being developed, so MPCA's resource needs for these tasks are unclear. MPCA should provide the 2003 Legislature with more specific

In addition, mobile sources of air pollution might need more of MPCA's attention so that the state can avoid potentially expensive violations of federal standards for ozone and particulate matter. MPCA should report to the 2003 Legislature on state-level strategies that could cost-effectively address such risks.

It is unclear whether MPCA needs new funding to address emerging issues.

The full evaluation report, *Minnesota Pollution Control Agency Funding* (#pe02-02), includes the agency's response and is available at 651/296-4708 or:

www.auditor.leg.state.mn.us/ped/2002/pe0202.htm

Summary of Agency Response:

In a letter dated January 9, 2002, Commissioner Karen A. Studders of the Minnesota Pollution Control Agency described the report as "thoughtful and thorough" and said that MPCA agrees with the report's fee-related recommendations. The commissioner said that the report "is fair in pointing out the difficulties of sustaining polluter-pays fee funding at appropriate levels for the on-going regulatory programs, particularly the water quality fees." She said that "the Legislature has not been willing to authorize increased fees" in recent years. In addition, the commissioner said that the majority of Minnesota's air and water pollution comes from nonpoint sources that do not pay fees, "yet the general public expects the MPCA to address this pollution."

"Therefore, we would like to draw the Legislature's attention to the broader-based funding options described in Appendix C of the report," the commissioner said. "Broadly based fees and taxes more equitably reflect consumption of the environment because revenue rises when there are more impacts on the environment. These broad-based fees and taxes offer an opportunity to both replace the current (inadequate) permit fee structure and also fund nonpoint source activities from polluter-based sources rather than the General Fund."

The commissioner said that, as recommended in the report, MPCA will provide the 2003 Legislature with information on funding needs for (1) implementation of federal Total Maximum Daily Load requirements, and (2) strategies to address air toxics. In addition, the commissioner said, "We believe that in 2001 we made the necessary corrective changes to [MPCA's 1998 reorganization] and believe these changes will allow us to improve implementation of our core environmental programs."

Appendix 5
Hazardous Waste Tax Payment Breakdown
1995-2003

Appendix 5
Hazardous Waste Tax Payments Breakdown 1995-2003
And
Total Revenue Breakdown 2003-2005 (proposed)

Year	Large		Small		Very Small		Totals	
	Number	Tax	Number	Tax	Number	Tax	Number	Tax
1995	305	\$980,049	1,482	\$318,612	8,613	\$430,751	10,400	\$1,729,412
1996	319	\$1,067,139	1,326	\$293,368	8,444	\$426,299	10,089	\$1,786,806
1997	300	\$808,723	1,308	\$274,145	8,380	\$424,036	9,988	\$1,506,905
1998	316	\$815,544	1,284	\$269,029	7,856	\$396,208	9,456	\$1,480,780
1999	293	\$627,278	1,264	\$267,118	7,141	\$364,320	8,698	\$1,258,716
2000	306	\$489,314	1,212	\$254,115	6,809	\$344,927	8,327	\$1,088,356
2001	263	\$832,967	1,162	\$253,870	6,266	\$315,386	7,691	\$1,402,223
2002	243	\$791,268	1,058	\$272,654	5,936	\$298,504	7,237	\$1,362,426
2003	223	\$828,933	988	\$214,066	5,432	\$274,333	6,643	\$1,317,332
Total	2,345	\$6,412,282	10,096	\$2,202,911	59,445	\$3,000,430	71,886	\$11,615,624

% tax paid			% of generators		
Year	Metro	Non-Metro	Year	Metro	Non-Metro
1995	76.5	23.5	1995	55.6	44.4
1996	72.9	27.1	1996	55.2	44.8
1997	70.9	29.1	1997	55.2	44.8
1998	70.8	29.2	1998	52	48
1999	69.3	30.7	1999	52.7	47.3
2000	63.3	36.7	2000	52.1	47.9
2001	75.3	24.7	2001	53.3	46.7
2002	75.6	24.4	2002	54.7	45.3
2003	80.7	19.3	2003	54.5	45.5

**Total Fee and Tax Historical
Payment Breakdown**

	2003		2004	2005 proposed
	Fee	Fee+Tax	Fee	40/60
ISD's	629340	629340	853044	848920
generator	1838660	3155993	3784373	3619080
Metro	649599	1713130	1337018	1447632
Non-metr	1189062	1442863	2447354	2171448