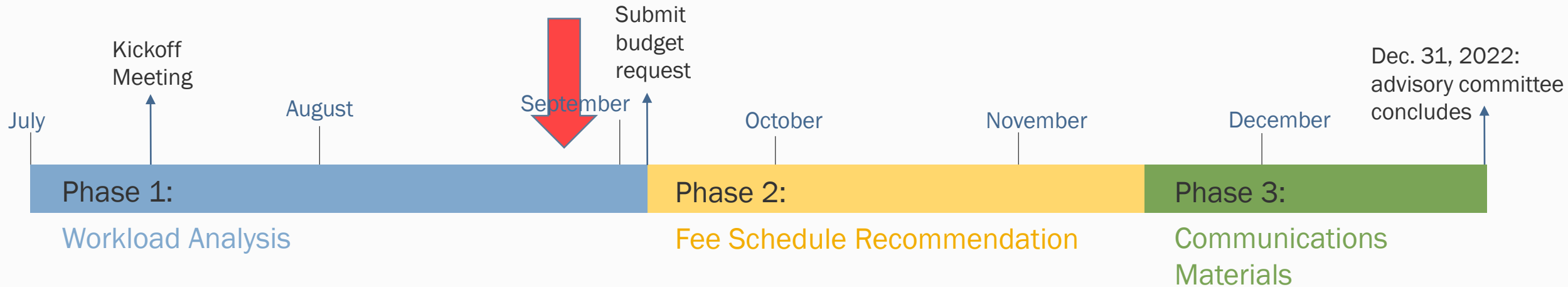


Wastewater Permit Fees Stakeholder Advisory Committee

Meeting 3

August 22th, 2022

Advisory Committee Timeline & Deliverables



Deliverable #1: Workload Analysis

- Assess the staffing level necessary in the WQ permit fee program to support adequate levels of service to permittees
- Includes: FTE level & corresponding revenue level

Deliverable #2: Fee Schedule Recommendation

Recommend a fee structure for the program to reduce municipal wastewater permit backlogs and recover the cost of administering the permits.

Deliverable #3: Communication Materials (optional)

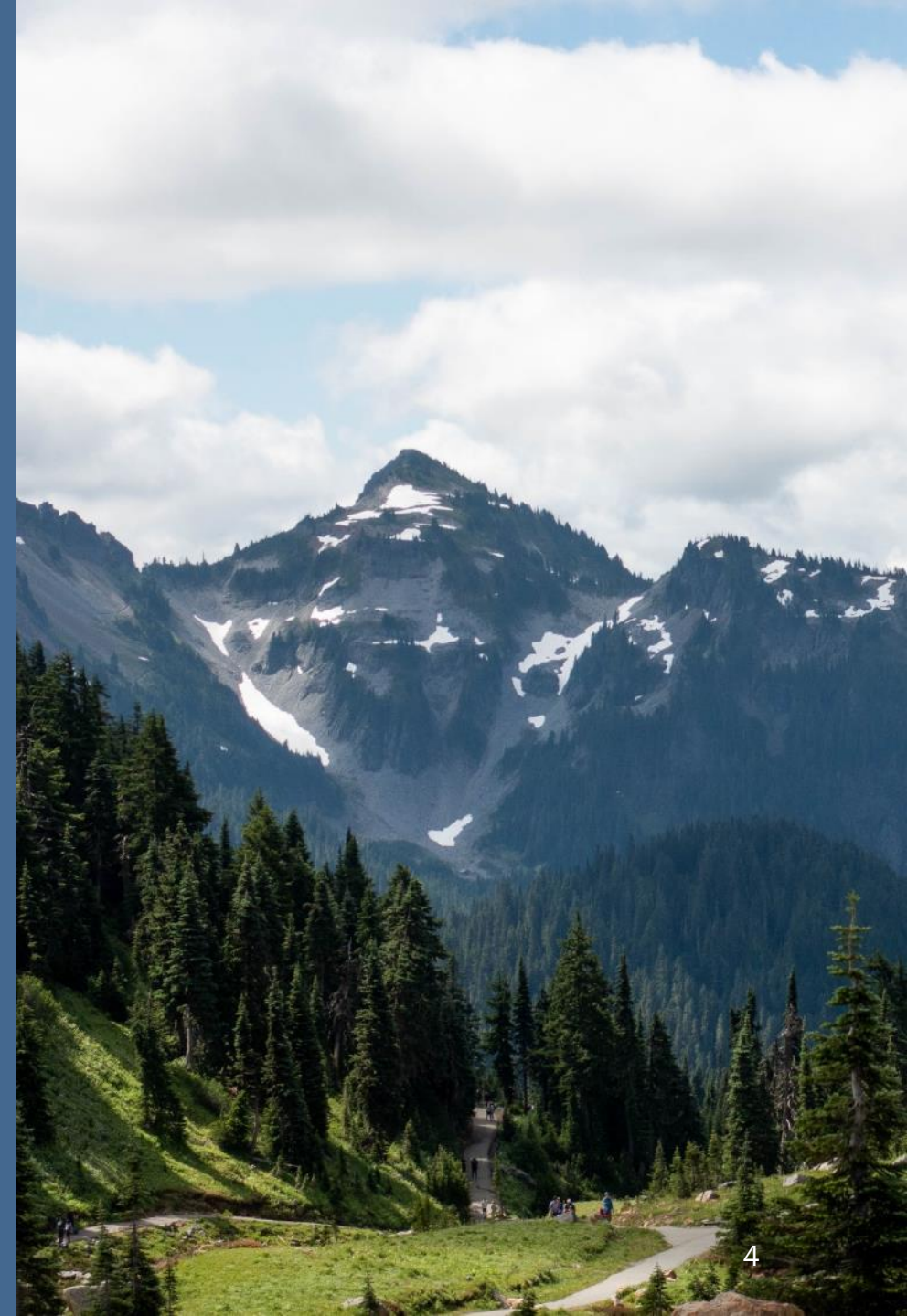
Collaboratively create materials for consistent messaging and necessary background to explain the fee increase to stakeholders.

Meeting Agenda

- 1 Approval of Meeting Minutes
- 2 Monitoring Our Progress / Future Check Ins
- 3 Statewide Strategic Guidance
- 4 Vote on 10:1 Staffing Level
- 5 Staffing Up Now
- 6 Phase 2: Fee Schedule Recommendation

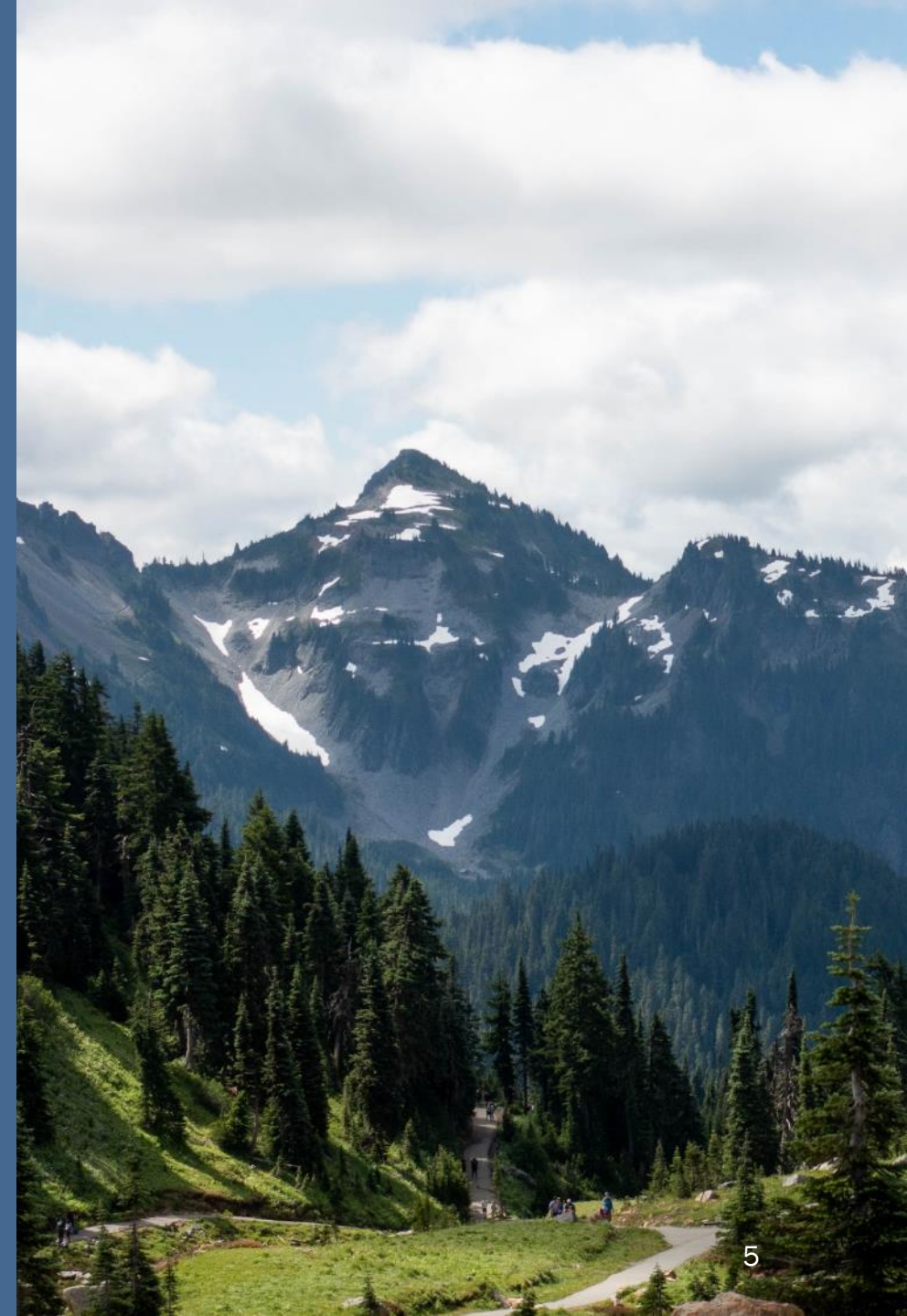


Approval of Meeting Minutes





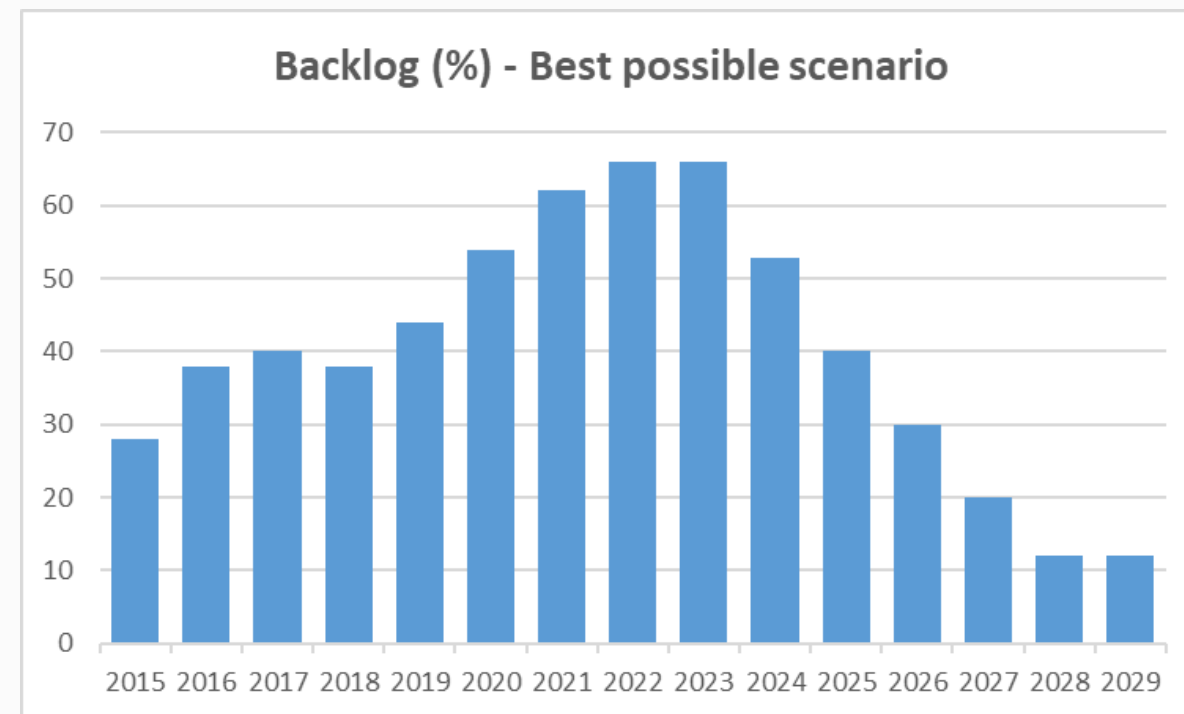
Monitoring Our Progress



Review: Timeframe for Reducing the Backlog

Starting assumptions (best-case scenario)

- We have the full spending authority and revenue to fully fund the WWTP workload
- We are able to fully staff up on July 1, 2023
- Staff require no training
- We don't fall further behind between now and July 2023

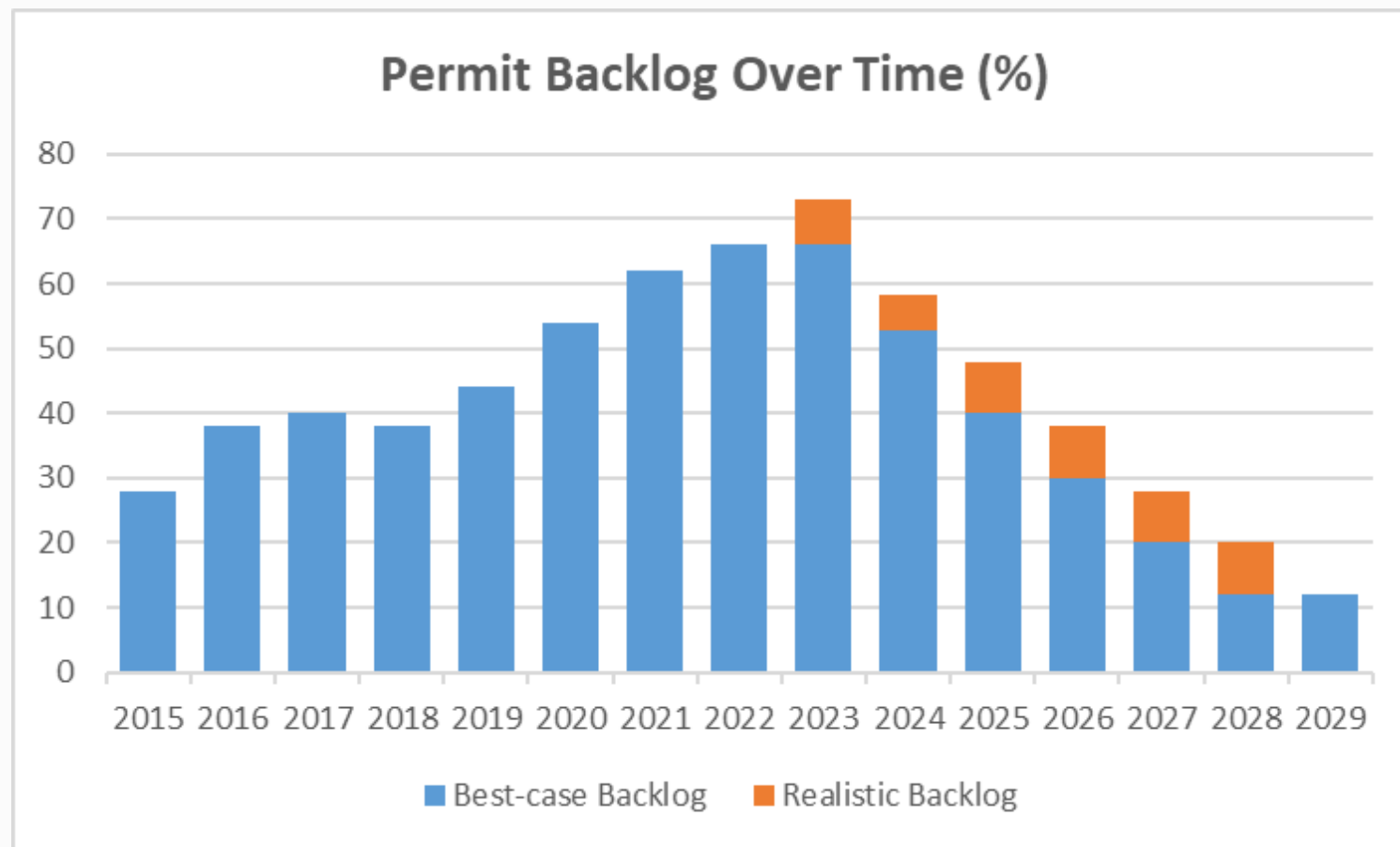


↑
now

Review: Timeframe for Reducing the Backlog

With realistic assumptions, we likely don't hit our goals

We'll propose later this summer hiring some staff now - in advance of our fee rule and budget request - to get ahead of this



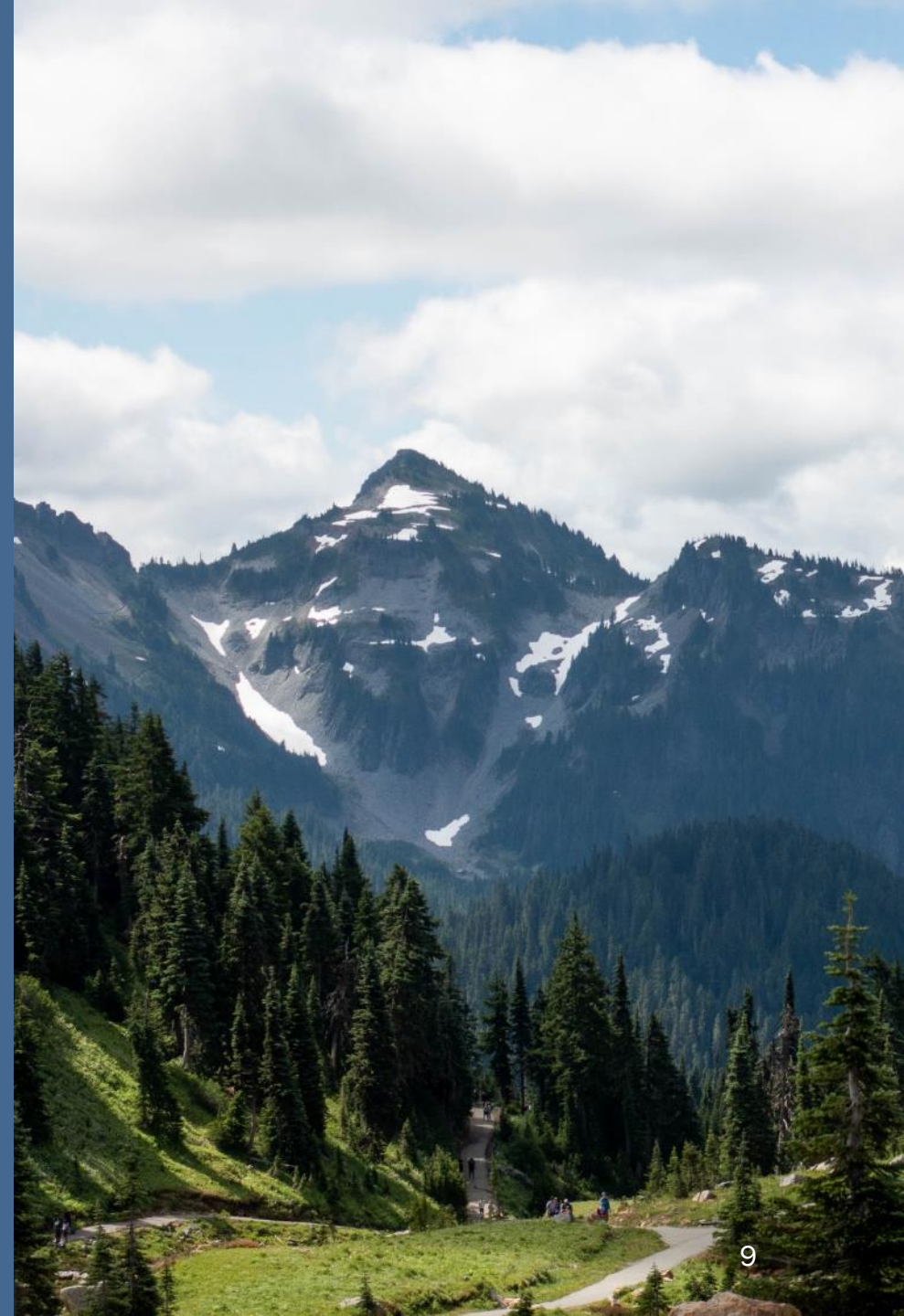
Proposed Check-In Timeline

To assess progress towards backlog reduction and the adequacy of the 10 permits: 1 staff person ratio, we propose the following meetings:

- Annual check-ins with CCW and WASWD to see how technical assistance and responsiveness is doing, starting in 2024
- Initial Check-in with this committee– Fall 2025
- Second Check-in – Fall 2027
- Committee Check-ins could review success in filling positions and progress reissuing permits, plus any fine-tuning of the staffing level model. It's possible we will not yet be at peak performance by 2025, but we will have data trends to review.



Statewide Strategic Guidance



How We Currently Address Statewide Policies

Existing Statewide Groups

- Water Quality Standards: 3 staff
[Water quality standards - Washington State Department of Ecology](#)
- CECs: [Contaminants of Emerging Concern - Washington State Department of Ecology](#)
- PFOS: [PFAS - Washington State Department of Ecology](#)
- Permit Writer's Workgroup: Peer group for permit writers, permit writer's manual, and various templates
- WWTP Permits – Coordinator and liaison role

The Challenges Around Policy Challenges

- Can be waiting for federal decisions
- Rarely have complete control
- Often very case-specific
- Moving target as issues develop

An Additional Coordinator Could Assist with...

Permitting guidance core work:

- Updating permit shell documents for accessibility and current policy
- Updating Permit Writers Manual
- Training for permit writers – application review, data management & analysis, use of spreadsheet tools, basic statistics
- Coordination of engineering technical support and review work– Orange Book
- HQ Quality Assurance review of draft permits

Permitting guidance – new and ongoing issues:

- Permitting for human health toxics with very low standards & limited data (PCBs, arsenic)
- Responding to concerns about CECs (pharmaceuticals, PFAS, PBDE, etc. etc.)
- Addressing 303(d) listings for fish tissue impairments
- Management of individual permits connected to new nutrients general permit
- Additional support for response to public comments



Vote on 10:1



Decision on the floor

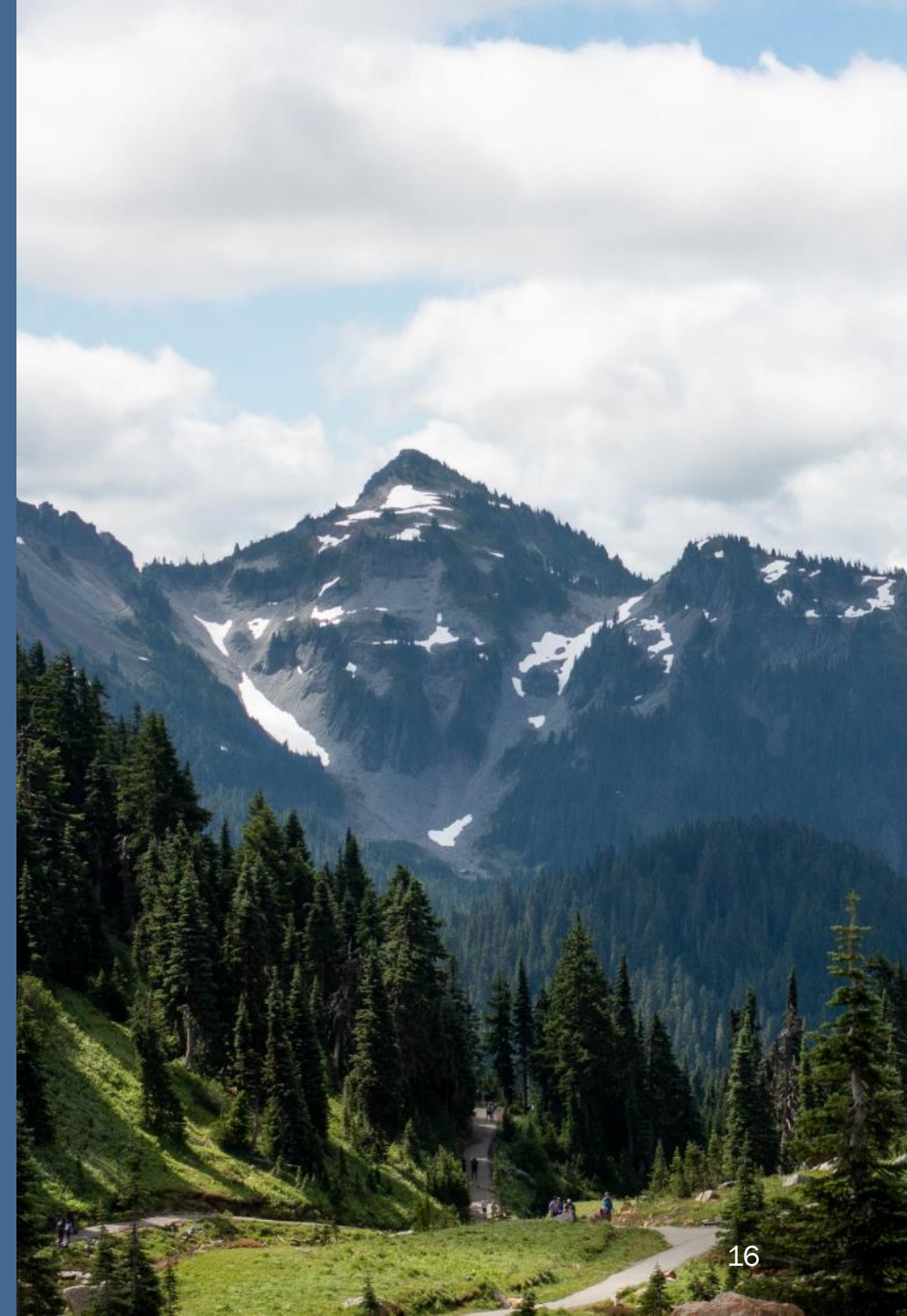
- With check-ins as agreed to above, and enhanced central support and strategic guidance on policy challenges, does the Committee support having a target of permit : staff ratio of 10:1?

Voting Scale

1. Enthusiastic Support – I really like it
2. Lukewarm Support – I can live with it; it is an improvement
3. Meager Support – I have concerns, but can go along with it
4. Objection – I do not support the idea or proposal



Staffing Up Now



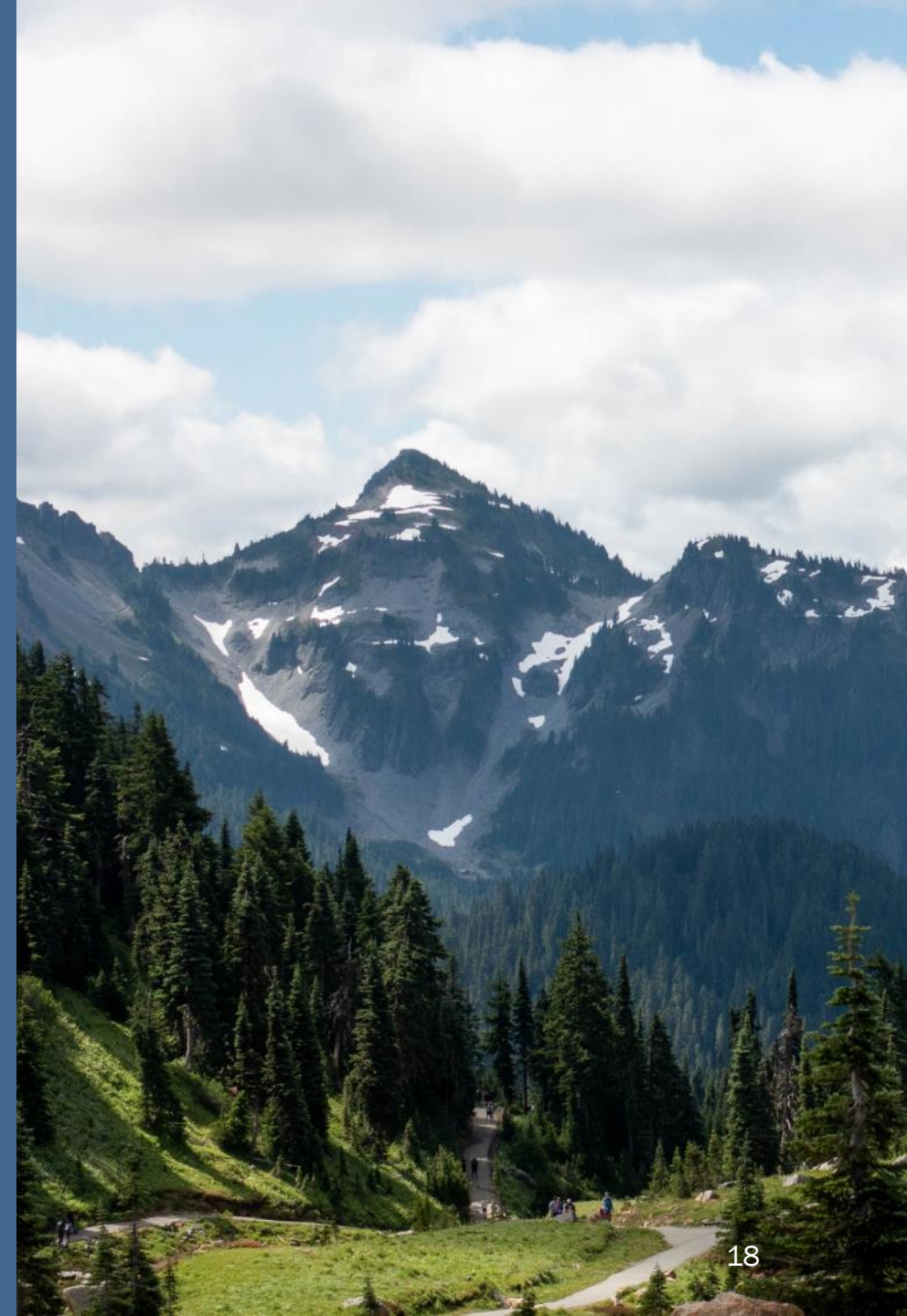
Using Vacancy Savings

Proposal: begin recruiting for 4 new permit manager positions ASAP to start chipping away at the backlog and building more experience.

- 2 in SWRO (reduces the permit:staff ratio from 21:1 to 14:1)
- 1 in CRO (from 17:1 ratio to 13:1 ratio)
- 1 in ERO (from 20:1 ratio to 17:1 ratio)



Phase 2: Fee Schedule Recommendation



From Staffing to Revenue

- 1 Review Ecology Budget Request and Comment
- 2 Estimating Revenue Need
- 3 Next Steps

Ecology Budget Proposal

Section	Number of Positions
SWRO	6
CRO	3
ERO	4
HQ	2
Total	15

Includes:

- 12 permit staff to get to 10:1
- 1 additional central coordinator
- 1 unit supervisor
- 1 support position
- Agency overhead

Total Costs Per Fiscal Year = \$2,501,000

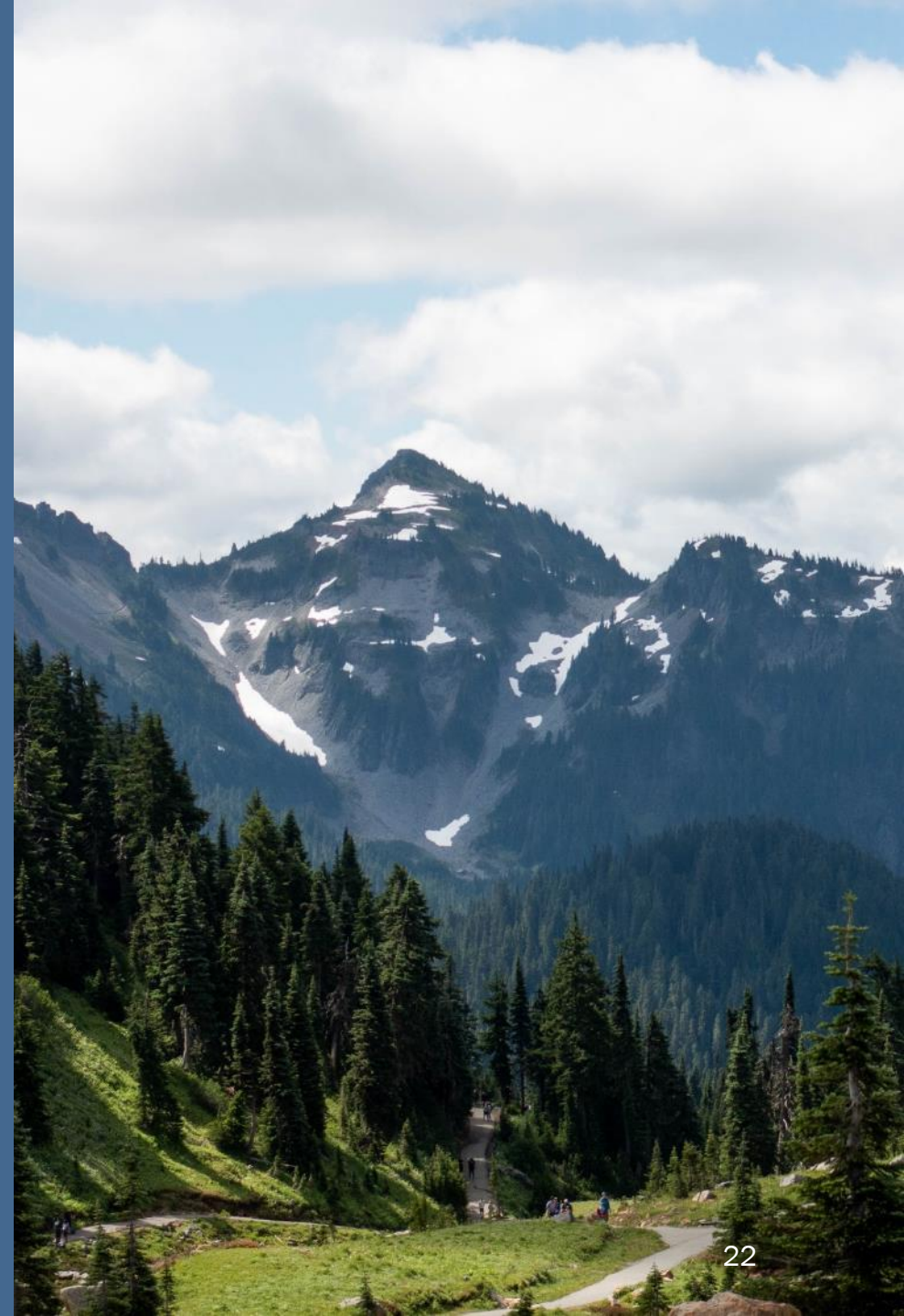
Estimating Revenue Needs

More detail at our next meeting. For now:

- \$2.5 M for new staff
- Projected inflation on existing costs
- Phasing out funding from other permit sources (up to \$2M) – methodology under review



Next Meeting



Next Steps

Firming up a revenue target

Identify parameters for translating revenue into a fee schedule

- Timing: Phasing in fee increases
- Rates: Fairness – ability to pay vs. relative workload



Thank you!

David Giglio

Deputy Program Manager

Advisory Committee Facilitator

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