

Municipal Wastewater Permit Fees Advisory Committee

Meeting 10

Group/Committee	Municipal Wastewater Permit Fees Advisory Committee
Date	June 24, 2024
Time	10am-12pm
Location	Microsoft Teams

Meeting Materials: available on our [committee website](#)

Attendees:

Stakeholders

- Jessica Shaw
- Raul Sanchez
- Sharman Herrin
- Luke Slaughterbeck
- Dan Eisses
- Dave Barnes
- Mindy Roberts
- John Peterson
- Robert Lindsay

Ecology Team

- Leslie Connelly
- Ligeia Heagy
- Andrew Kolosseus
- Shawn McKone
- Emma Froembling
- David Giglio

Discussion Notes:

Timeline, Agenda, Intros: Slides 2-4

- Covered agenda items for meeting.
- Introduced the present attendees.

Revisiting Committee Purpose: Slides 5-8

- **Question:** Will we be getting more info on additional staff and what the workload is? – specifically the amount of time per workload vs. number of permits. What’s the time spent for each task related to the permit?
 - **Response:** We do have information about staffing increase, but we do not track individual tasks of each phase of permits. That is a level of detail that we do not have data on, but we can discuss in a qualitative way about reissuing permits and increasing staff.
 - **Response:** The challenge that Ecology sees is if we take on a particular permit writer and track all their steps to complete a permit, there would still be so much variability between other permits and the changes from year to year. This makes it

difficult to track the data accurately to make predictions. Once we are staffed up, we will have the macro level data that can help us predict how many permits to issue to year to help track our success.

- **Interest:** To see the data that we do have. The cost of service for the permits we do have is not out of the norm, so we can track the various tasks. Curious to see what's changed since last time.
- **Question:** Do you have information on time spent of individual permits?
 - **Response:** We (Ecology) don't. We track overall permits and not specific individual permits.
- Reiterate previous point = going forward looking at tracking people's times so we can identify where the costs are being generated. At least having the data to look at would support the information.
 - **Ecology:** We used to have our timekeeping to have a narrow focus of task codes attempting to track minute activities, but it became a situation of trying to force a timesheet to fit what we were doing, rather than getting the actual work done. We do have clarity on how much time we spend on WWTP vs. other permits.
- Ecology priority = decrease the steps to increase the efficiency of getting the permits out. Improving our processes and efficiencies is the priority over tracking the timing of the specific tasks.
- **Ecology:** Our timesheet system is all going to change next year. We are moving to workday system for accounting next year, so in terms of making a commitment to the committee, we want to acknowledge that we will be in an accounting transition next year. It wouldn't be feasible this year, but maybe something to think about for next biennium.
- A lot of facilities are doing a lot of engineering work to improve their facilities and it is a balancing act between to improvement of facilities vs. permit writing.
- **Teams message:** "Regarding "considering individual permits for smaller facilities" -- our notes from 2022 say is there "is a simpler tool [than individual permits] available that still protects water quality"."
 - **Teams message:** "I believe all of our WWTP permit writers are 100% focused on WWTPs, btw."

Status of Backlog and Hiring: Slides 9-12

- The new filled positions are a lot of new hires who are less experienced, but we (Ecology) have a plan to match them up with more senior staff to help mentor them to speed up their training and production.
- **Question:** "How many per year should be issued?"
 - **Response:** "We have 300+ permits, so 60/year is the long-term target."
- We acknowledge the concern about reaching the 2025 goal, but we do fully expect to reach our target by 2027. (Ecology staffing in the regions)

Permit Fee Revenue & Future Rulemaking: Slides 13-15

- There was a past interest in how the revenue fluctuate based on inflation:
 - Answer: about 1% went towards REs & 2% in gross revenue. Overall, it is a minor impact on the increase in revenue.

- We (Ecology) can report back to you (Advisory committee) on analysis in the fall via email or another meeting: open to future feedback.

Flow Based Rate Concepts: Slides 16-21

- Additional comments for actual flow approach: **Ecology** – purpose for collecting PARIS data is to demonstrate compliance with permits. Making sure we can report that info to EPA for compliance data. PARIS revolves around compliance with permits. There isn't a standardization of monitoring specific level of detail, that is more case by case. There will be variability the data we are collecting because of this.
- Additional comments of design flow: **Ecology** - we do have a bunch of other fee categories based on design flow that we pull out the permits.
- **Question** for the group: What is the level of interest in pursuing either actual or design flow as method for setting permit fees?
 - **Response:** Always been a fan of the RE approach because of the underlying business structure. It provides a stable funding sources for ECY, there is a 1:1 correspondence for a flow. It would be difficult to incorporate another variable of weather into the flow.
 - **Response:** same reasons as above; REs would support Ecology filling the backlogs. Getting to the 40% is the priority. It doesn't seem like changing to a different concept is worth the effort. Continuing with REs would be preferable.
 - **Response:** agrees with above points. Providing consistency and standardization is the priority. Sticking with the REs makes the most sense.
- **Summary:** Committee is comfortable with Ecology sticking with REs at this point. We will be doing our rate analysis this fall and we can circle back with this committee by email to notify you on the results. Focus on getting permit backlog down & interest in the workload is around making sure that we are not spending all our time on one task.
- **Interest:** It would be helpful for this committee to know more specific tasks of the permit management process and how much time is spent on those tasks for individual permits.
 - **Response:** "And also on cross-permit activities, like training to ensure consistency. That would be helpful."
 - **Response question:** What part of the permit process is taking so much time and how do we change, or address is to help Ecology get ahead of this?

Next Meeting Items/Roundtable Topics:

- **Committee:** Fine with skipping July meeting and happy to receive update on hiring and analysis with potential of a follow-up meeting to discuss.
- **Interest:** would be curious to see expense side of maybe 8 vacant positions and seeing how the impacts things. How does what treatment plants bring in revenue and expense wise compared to the other Ecology activities?
 - **Response:** Ecology's RCW requires we recover program costs, agency costs, we figure out each permit's revenue goal. If there are fee categories that need an increase, we look at our cash balance first.
- Meet end of September or October to discuss rates, revenue, expenses, savings, under and over analysis, and how this category compares to other, and update on hiring and backlog.