STATE OF COLORADO

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Colorado Department of Public Health and Environment

Legislative Request for Information
Water Quality Control Division
2010-2011

Department of Public Health and Environment, Water Quality Control Division – The Department is requested to submit a report on the Water Quality Control Division. This report is requested to include a summary of the Division's current and anticipated workload, including the impact of existing and proposed federal and state program requirements, as well as the associated funding and staffing needs. This report is requested to include information on the upcoming fiscal year and out-years. The Department is requested to submit this report to the Joint Budget Committee by November 1, 2010.

The protection, maintenance, and restoration of Colorado's water resources is a dynamic process that continues to change due to population growth in the state and the attendant pressure on a limited supply, and a regulatory framework that continues to evolve as our understanding and knowledge of water quality issues improves and science and technology advances. While it is difficult to predict the future program requirements and resource needs of the Water Quality Control Division (Division), this report provides the Division's best estimate at this point in time. This report includes a summary of the Division's current and anticipated workloads, including the impact of existing and proposed federal and state program requirements, as well as the associated funding and staffing needs by program.
Please note that this report is in response to a legislative request and is not a request for additional resources.

Executive Summary

The Division has been experiencing a growing resource gap over the last few years. The workload has substantially increased due to population growth, more demands on a static or declining water supply, new EPA drinking water and clean water rules and policies, a U.S. Appeals Court ruling on pesticide permitting, and aging and failing water and wastewater infrastructure. These factors are straining existing division resources and negatively impacting essential core responsibilities resulting in the following negative impacts:

- the number of permitted facilities that are not inspected is growing;
- approximately 200 wastewater facilities are discharging domestic waste to groundwater without a permit;
- a significant percentage of identified drinking water and wastewater violations including infrastructure deficiencies are not resolved;

- lack of oversight of drinking water supplied from non-community groundwater systems;
- the backlog of priority permits not issued will exceed EPA's 30% threshold requirement, and
- reduced level of data collection and analysis of streams, lakes/reservoirs, wetlands, and aquatic life conditions.

There is an increased risk of public health disease outbreaks, increased chronic health risks from drinking water due to exposure to contaminants such as elevated radionuclides, delayed response to spills into state waters, and an increased risk to the State's water quality.

The Division has identified an immediate need of 31. 8 FTE in 2011-2012. Based on national models for full implementation of the Safe Drinking Water and Clean Water Act Programs an additional 34.5 FTE will be needed over the next three years for an overall resource need of 66.3 FTE.

Legislative Request for Information
Water Quality Control Division
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Introduction

The Division is organized into three programs: Safe Drinking Water, Clean Water, and Administration. The core functions are outlined below:

Water Quality Control Division

Assure safe drinking water is provided from public water systems for the people of the state
(Federal Safe Drinking Water Act)
&
Maintain, restore, and improve the quality of the state's waters
(Federal Clean Water Act)

Water Quality Control Commission
(Rules and Regulations)

Safe Drinking Water Program

Compliance Oversight (Surveillance monitoring, facility inspections and drinking water facility engineering design reviews)

Training and Technical assistance (assure safe and continuous delivery of drinking water)

2,020 Public Water Systems

Water Pollution Control Program

Permits for discharges to waters of the state

Compliance Oversight and Assistance (Wastewater, storm water, and reuse facility inspections, wastewater and reuse treatment facility engineering design reviews)

Oversee beneficial application of biosolids from municipal wastewater treatment facilities

9,904 Permitted Facilities

Watershed Program

Collect, assess, and report water quality of rivers and streams (105,344 miles), lakes and reservoirs (249,787 acres).

Provide technical support to the Commission for adoption of surface/ground water standards

Support water quality management planning.

Financial support for nonpoint source control projects and source water protection planning.

Administration Program

Financial and technical support for drinking water, waste water and nonpoint source infrastructure:

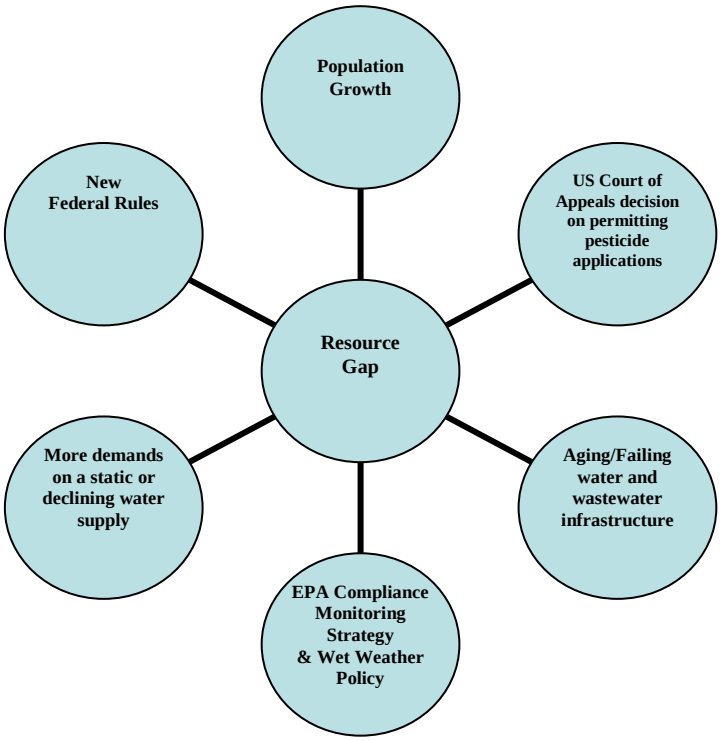
- 150 total projects totaling $344 million.
- 13 approved projects in FY 2009-10 totaling $98.0 million

Fiscal management, Administrative and business services, Information technology and data support.

The Division implements and enforces water quality management policies and rules established by the Water Quality Control Commission (Commission) consistent with the authorities established in the Colorado Water Quality Control Act, C.R.S. § 25-8-101 et. seq. The Governor-appointed Commission develops the rules for water quality management in Colorado. It holds hearings in each of the state's major river basins to set water quality use classifications and standards, and develops regulations to ensure protection of those uses and standards. The Commission is also responsible for adopting safe drinking water regulations.

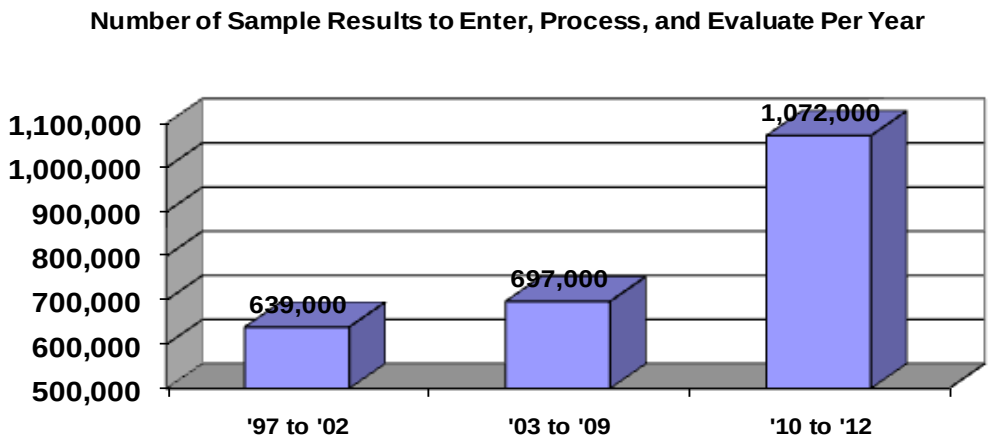
Division Resource Gap

The Division has been short of resources for many years. In 2004, the Division's Senate Bill 276 Report identified a critical need for 32.7 FTE over a three-year period. These conclusions were supported by the Division's stakeholder community. The report also identified a much greater need based on national models for full implementation of the Safe Drinking Water and Clean Water Act programs. The Division was able to secure 22.2 of the needed FTE in the 2006 and 2007 legislative sessions, but funding for the remaining positions has not been provided to date. Since that time, the Division's work load has increased substantially. For example:



1. Colorado's population growth (from 4.3 million people in 2000 to an estimated 5.1 million people in 2010) has fueled requests for review of new construction plans and for permitting of new discharges as well as expansions to the capacity of existing wastewater treatment facilities and associated amendments of permits. The Division has seen a 97% increase in the number of storm water permits since FY 2004.

2. Major rules were promulgated by EPA that impact all of the approximately 2,020 public water systems in Colorado, and greatly increases the burden on the Division to manage, review and interpret monitoring data reported by the water systems, to inspect the water systems, and to assure that systems with problems get those problems addressed.

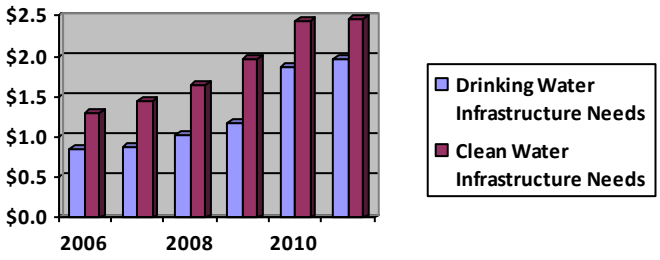


3. EPA finalized the Compliance Monitoring Strategy in 2008 requiring states to implement the Wet Weather Significant Non-Compliance (SNC) Policy by October 2010. Wet weather events are discharges, caused by rain or snow melt, which can contain bacteria pathogens and other pollutants that can cause illnesses in humans and harm the state's water resources. The Compliance Monitoring Policy requires a significant increase in the number of inspections and audits at permitted stormwater sites. This policy will require significant additional resources to implement. New/increased activities that will be required include:

    a. inspector-based significant non-compliance determinations for spills and violations identified at wastewater treatment plants and facilities with stormwater permits;
    b. additional compliance assistance and enforcement to address wet weather (spill/stormwater) inspection-identified non-compliance as well as other violations discovered during inspections; and
    c. conducting audits of the 121 municipal permitted separate storm water sewer systems.

4. In a February 2009 consolidated decision, the United States Court of Appeals for the 6th Circuit overturned an EPA rule that exempted the application of pesticides in or near waters from the requirement to obtain a discharge permit. Pursuant to a request by EPA, this ruling has been stayed by the Court until April 9, 2011. At that time, applications of pesticides in Colorado must be done in accordance with a permit issued by the Division. This includes pesticide applications for purposes such as control of mosquitoes and aquatic weeds. This requirement is estimated to result in an increase of approximately 2,000 permits the Division is required to issue under state and federal law to an industry that has previously been unregulated under the state and federal Water Quality Acts.

5. The estimated drinking water and wastewater infrastructure needs for Colorado exceeds $4.4 billion and is growing. This is due to the aging/failing infrastructure of existing drinking water and wastewater treatment facilities, failing distribution and collection lines, new, more stringent drinking water and water quality protection standards, and statewide population increases. There are currently over 150 active water and wastewater projects that have received funding through the State Revolving Loan Fund and these numbers are expected to increase.



Figures in billions

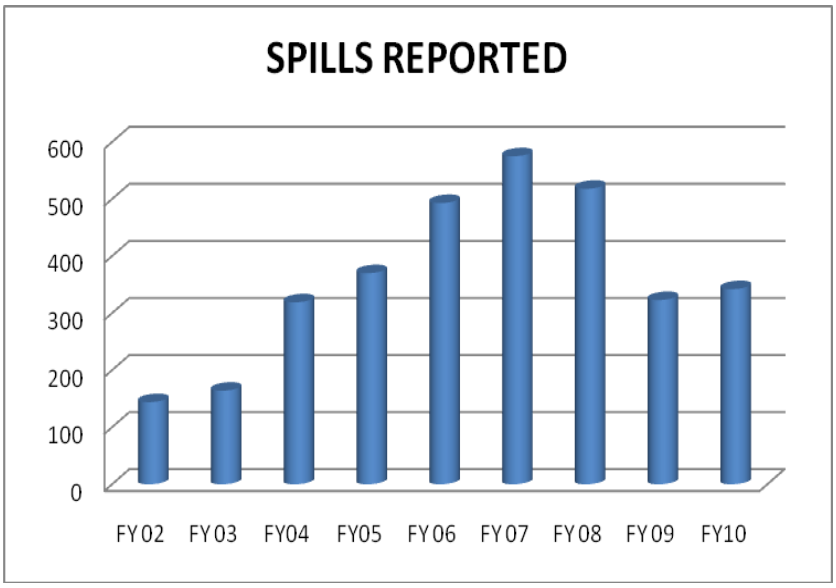
6. As more and more demands are placed on a static or declining water supply and as that water supply faces increased adverse water quality impacts, the implementation of water quality standards becomes more difficult. This requires preparation of more complex and labor intensive discharge permits. Due to the recognition that many small or low income communities find it extremely difficult to pay for the cost of advanced wastewater treatment, the Commission adopted a discharger specific variance rule. A variance for a discharge, if approved, exempts a community from a specific water quality standard due to extreme financial hardship. The Division is preparing guidance on how the variance process will work including the process for approval by both the Commission and EPA. The Division will have much of the burden of assuring that variance requests meet the requirements necessary for these approvals.

7. The Clean Water programs rely on information-based decisions to implement their various regulatory and non-regulatory components. These decisions are founded on the collection, analysis, interpretation, and reporting of the physical, chemical, and biological conditions of the water bodies across the state. There are currently over 840 individual water bodies defined by the Commission that require periodic monitoring. Current staffing levels and a fixed laboratory analytical budget limit the amount of information collected to determine the status of these water bodies. Population growth and water use has increased the need for more water quality and quantity related information. At current resource levels, the Division does not have adequate information to effectively respond to current and future challenges of protecting and restoring the integrity of Colorado's water bodies.

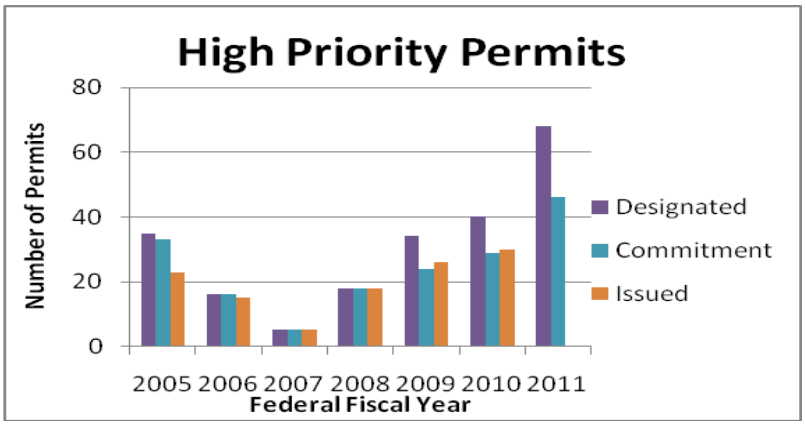
Strategically deploying resources to address highest priority activities

The Division has responded to the increasing workload by focusing its efforts on those activities that have the most significant public health or environmental impact, and those functions that are directly related to statutory obligations or performance measures linked to receipt of federal funds from EPA. This includes:

1. Responding promptly to drinking water acute situations or spills to waterways. This is one of the most important functions performed by the Division but is one that cannot be planned for given the unpredictability of these situations. Furthermore, there is not a dedicated source of funds for responding to emergencies, thus requiring the Division's resources be diverted from on-going work to address the emergency. The Division responds to 40 to 60 drinking water acute situations each year, where a public water system's delivery of safe drinking water to its citizens has possibly been compromised.



The number of spills to streams, lakes and reservoirs that are reported to the Division each year more than tripled between 2002 and 2007. These spills include releases of raw sewage, petroleum products, metals, or organic chemicals, and can result in fish kills, potential impacts to downstream water users including drinking water systems, or risks of exposure to recreational users. In response to the growing number of reports and the limited resources available to respond to all spills the Division developed and implemented a Spill Reporting Guidance document. This guidance went into effect in early 2008 and reduced the number of spills that were required to be reported, based upon where the spill occurred, if it reached state waters and how it was managed and cleaned-up. The fact that the spill numbers went down in SFY09 and SFY10 is indicative of the effectiveness of the Spill Reporting Guidance, not to an actual decrease in the number of spills.



2. <u>Issuance of EPA designated high priority permits.</u> EPA considers any expired permit for which a renewal application has been received by the Division that has not been acted upon for two years or more, to be a priority permit or a permit for which a Total Maximum Daily Load (TMDL) waste load allocation needs to be implemented. There are also several additional environmental reasons (e.g., drinking water intake, sensitive species, critical habitat.) a permit can be "designated" a high priority. As part of the Performance Partnership Agreement between the Department and EPA, EPA now requires that states "commit" to issuing a specific number of designated high priority permits. Given that the Division still receives over 50% of its funds from EPA, it strives to issue the agreed upon number of high priority permits in the Performance Partnership Agreement. The Division has focused its resources on these efforts and has met its commitments. However, in recent years the Division has not been successful in issuing all designated high priority permits. In 2011 the number of designated permits will dramatically increase.

3. <u>Restoration of Impaired Water Bodies.</u> Colorado has completed 148 TMDL reduction calculations that have been approved by EPA. TMDL implementation as measured by restoration of impaired water quality is identified as an EPA national priority in its Performance Partnership Agreement with states. One hundred thirty-three (133) or 89% of the complete

TMDLs are related to legacy mining pollutants (zinc, copper, cadmium, lead, pH, iron, aluminum, and manganese). Very few of these legacy mining-related load reductions identified in the TMDLs have been implemented, and those that have been implemented were primarily through voluntary projects funded by federal Clean Water Act Section 319 grant funds. These impaired waters are located at the headwaters of many of Colorado's most valued streams. These streams would support fishing and other recreational activities if the harmful impacts of historic mining activity were addressed.

4. Comprehensive Characterization of Colorado's Waters. It is extremely important to have a complete understanding of the state's waters. Water quality policy and management decisions are based on the collection and assessment of water quality data for rivers, streams, lakes, reservoirs, and ground water. For the most recent reporting cycle, over 94,455 stream/river miles and over 255,567 lake/reservoir acres were assessed for attainment of water quality standards. For Colorado rivers/streams, 63% have been assessed, with 37% not assessed. For lakes/reservoirs, 61% have been assessed, with 39% not assessed. The Division integrates this data into other internal monitoring activities including discharge permit development and compliance assurance, support for issuing fish consumption advisories, and evaluating point and nonpoint source controls infrastructure effectiveness to better target future investment.

What is not getting done?

The workload increase without a commensurate increase in Division staffing resources is resulting in the following negative impacts:

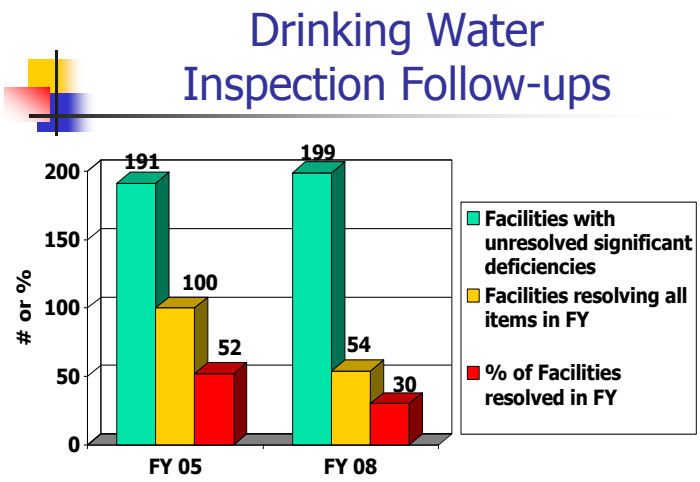
1. Inspection Gap. The Division is unable to inspect more than 900 process water discharges including temporary activities such as construction dewatering and hydrostatic pipeline testing as well as permanent facilities such as sand and gravel mines and cooling towers. Periodic inspections of a percentage of these activities/facilities are necessary to assure compliance and to identify and address violations. In addition, the Division inspects less than 3% of the over 5,500 activities covered under stormwater permits.

2. Stormwater Compliance Assistance/Assurance Gap. The Division is unable to provide meaningful compliance assistance to its 5,500 permitted stormwater dischargers and 2,000 process water permittees. This results in a significant percentage of inspection-identified violations not being resolved. Additional resources would allow staff to provide assistance rather than the current practice of moving directly to enforcement or leaving the violation unresolved. Enforcement is a costly and time consuming process and is not the most effective way to gain compliance. At the present time, the Division is only able to sustain a compliance oversight rate of less than 3% of all stormwater permits.

3. Groundwater Discharge Permits. The Colorado Discharge Permit System Regulations require that discharges from domestic sewage systems to groundwater obtain a permit. This is a state-only permit program. Due to lack of federal regulation and subsequent support, the Division has not been able to dedicate resources to this activity; rather the Division must address federally-required activities with established performance measures. The Division estimates that there are approximately 200 facilities that should be permitted, however many of these facilities do not have current permits and a significant number of these facilities are likely having a detrimental impact on ground water. The process to permit these facilities is resource intensive because most

facilities (believed to be over 80%) that do not have appropriate permit coverage need to upgrade their level of treatment. In order for these permit updates to occur, a large amount of assistance would need to be provided from division staff.

4. Lack of ability to follow up on identified drinking water violations. While the Safe Drinking Water Program is able to issue enforcement orders to systems with violations, it often does not have the resources to follow-up on those orders in a timely fashion. Failure to ensure that the offending public drinking water system is taking adequate steps to quickly gain compliance can mean citizens are drinking contaminated water. Additionally, as we have learned from the Alamosa salmonella outbreak, while the Safe Drinking Water Program has been completing inspections at required frequencies, the inspections may not have been comprehensive enough to detect significant deficiencies in storage and distribution system infrastructure. Furthermore, once inspection findings are issued to public water systems, the Safe Drinking Water Program struggles to find the resources to follow-up on violations and infrastructure deficiencies discovered during inspections. The Alamosa Investigation Report, released in November 2009, reported that approximately 120 community water systems in Colorado may have unresolved significant deficiencies. Some of these systems may have resolved these deficiencies, but the Safe Drinking Water Program is unable to adequately track these efforts due to lack of resources as well as inadequate Information Technology support for data management systems.



141,773 people served by public water systems do not receive safe drinking water.

13,800 citizens in Sterling are exposed to Uranium and Disinfection byproducts.

31,000 populace served by systems with radionuclides above standards.

5. Lack of oversight of non-community groundwater systems. Non-community groundwater systems meet the definition of a public water system, but do not serve year-round residents; examples include rural school districts and campgrounds. There are about 1,100 such systems in Colorado, but the Safe Drinking Water Program has historically focused its limited staff resources on community water systems, and provided only a bare minimum level of oversight to non-community systems. A non-community system experienced a waterborne-disease outbreak of norovirus in 2007 illustrating the need for and importance of more active oversight of these systems.

6. Issuance of EPA designated high priority permits. As indicated in the previous section the Division has not been able to "issue" all of the "designated" high priority permits. And the total number of "designated" high priority permits is dramatically increasing in 2011 and those

numbers are expected to continue for the foreseeable future. The water quality below these discharges will not be suitable for uses such as aquatic life, recreation and drinking water supply.

7. Data systems and data management. The Division is not able to collect, monitor, analyze, store and effectively retrieve data on 11,000 Clean Water permitted entities, 2000 public water systems and all water bodies of the state. To fulfill the Division's mission and protect public health and the environment the Division depends on accurate and timely data. There is a critical and escalating need for resources to support data management and upgrading of legacy database systems but again, the Division does not have the resources to conduct these activities.

8. Non-regulatory Protection and Restoration Activities. The Division is not able to provide adequate information, planning, financial, and scientific support services to the Commission, government agencies, and its performance partners so they can protect, improve, and restore water quality. Examples of non-regulatory responsibilities include characterization of lakes/reservoirs for elevated mercury in fish tissue, wetlands, and aquatic life conditions, certifications of water quality impacts from state and federal water projects, TMDL development, and nonpoint source impairment project identification and management. The increasing demand for support services to address these important water quality management activities cannot currently be met due to resource constraints.

Consequences of Not Receiving Additional Resources

If Division staffing continues to remain static as the demands placed on the Division continue to increase, adverse consequences include:

- For Drinking Water
  - Increased risk of disease outbreaks due to problems with drinking water filtration, lack of cross connection control, or inadequate disinfection at either the treatment plant or within the distribution system;
  - Increased chronic health risks from drinking water due to exposure to contaminants such as elevated radionuclides or disinfection byproducts; and
  - Increase risk of failure to recover critical public health information in the event of a disaster.

- For Clean Water
  - Delayed response to spills to water;
  - Increased risk to water quality due to inadequate permit coverage, inadequate facility inspections, and inadequate follow-up on violations;
  - Inadequate protection of classified water quality uses;
  - Increased costs to mitigate water quality impairments;
  - Delay or failure to issue permits, leading to EPA issuance of permits or citizen lawsuits;
  - Increase risk of data system failure;
  - Inability to fully implement disaster recovery for critical water quality data; and
  - Inadequate water quality information for policy and management decisions.

Immediate Resource Needs 2011-2012

Based on the most recent needs assessment conducted by the Division, the highest priority needs have been identified below. Without additional resources the threat to public health and water quality in the state will continue to rise. It is estimated that an additional 31.8 FTE are needed in 2011-2012.

Drinking Water Program (3.5 FTE)

FTE

1.0 Inspections/Design Reviews: Increase inspection frequencies in accordance with new rules and ensure deficiencies are corrected. Complete design reviews for drinking water infrastructure projects.

2.0 Compliance: Provide compliance oversight and training to public drinking water systems to increase compliance and reduce violations.

0.5 Operator Certification: Ensure that public drinking water systems have an appropriately certified operator.

Clean Water Programs (28.3 FTE)

FTE

4.5 Facility inspections (not including stormwater and pesticides): Inspect sectors (e.g., sand and gravel mines) that are currently not addressed and improve the timeliness of engineering reviews for construction of municipal wastewater treatment infrastructure.

1.0 Discharger Specific Variances: Develop and execute applicable implementation guidance, provide staff support for Commission consideration, and coordination with EPA for final approval.

4.0 Permitting (excluding stormwater and pesticides): The backlog of permits (including high priority permits) stood at 20% in October 2009 and is predicted to increase to 34% by October 2012 due to the increasing number and complexity of National Pollution Discharge Elimination Systems (NPDES) permits. If permits are not issued, industrial users may not be complying with the most current water quality standards and this may be harming public health and/or water quality.

4.0 Monitoring/Data Assessment: Water quality data is necessary to set standards that are protective of the classified uses (including drinking water supplies, recreational and agricultural uses), assess the status of surface and ground water quality, determine attainment of the applicable standards, and evaluate pollutant source control activities. Data is also used when making decisions on issuing fish consumption advisories, reviewing Section 401 water quality certifications, and evaluating point and nonpoint source controls infrastructure effectiveness.

3.0 Pesticides: Prepare and issue permits, conduct inspections, provide compliance assistance and take enforcement action when appropriate for this new federally required program.

5.8 Compliance Assurance (excluding stormwater and pesticides): Respond to violations. Failure of a timely response to violations of compliance schedule deadlines or permit effluent limits prevents streams from meeting water quality standards and protecting classified uses.

4.0 Storm water: Currently, the Division inspects less than 3 % of sites covered under industrial stormwater permits. More than 30% of the construction sites inspected warrant enforcement but the Division does not have resources to follow-through on all such cases. The Division needs to increase the number of stormwater inspections and to provide compliance assistance.

2.0 TMDL Development and Nonpoint Source Project Management: TMDL development continues to be a high national priority for EPA. The remaining TMDLs to be developed are more complex because of the nature of the pollutants (i.e. – mercury, pathogens, selenium). The

majority of water quality impairments are caused by nonpoint source pollution. Colorado has 144 EPA approved TMDL analyses, with 133 related to legacy mining impacts. Additional staff is needed to work with local interests on site characterization, engineering designs, and cleanup activities where possible.

Other Factors to be Considered

A fee increase of approximately 117% (an estimated $480,000 annually) would be required to support the additional 3.5 FTE, Information Technology Systems and data management support needed within the Drinking Water Program. There are currently 2,020 public water systems regulated by the Division. The fees range from $75/year to $21,360/year depending on the size of the population served. The majority of public water systems pay less than $100/year. This means that the annual increase to the majority of public water systems would be approximately $217.

Clean Water fees would also need to be increased. An increase of approximately 57% would be necessary for the existing 35 permit categories within the Clean Water Program. The fee would provide for an additional 25.3 FTE, Information Technology Systems and data management support. The total estimated cost of this fee increase is approximately $1,777,882. The fee increase would be spread across the current 9,904 active permits. Although the fees range from $75/year to $25,100/year, the majority of storm water permits are under $245/year. With this proposed increase the fee would rise to approximately $385 per year. The majority of processed water permits cost less than $700/year. With the needed fee increase, the cost would rise to approximately $1,099 per year.

A new fee would also need to be implemented for pesticide permits. The new pesticide fee would provide funding for 3.0 FTE and associated operating

Due to the economic downturn the Divisions efforts over the last three years to obtain the stakeholder communities support for an increase in fees have been unsuccessful.

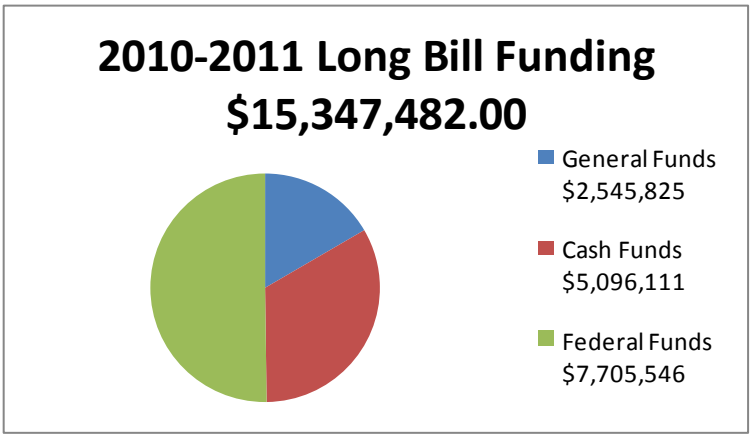
General Fund

The Division receives approximately $2.5 million in General Fund (approximately $1.6 million for the Clean Water Program and $0.9 million for the Safe Drinking Water Program). The General Fund appropriation assists with providing the required state match for various federal programs such as the EPA State Performance Partnership Grant.

Replacing General Funds with Cash Fees

Drinking Water Fees would increase by 267%
(Average drinking water annual fee $367/year)

Clean Water Fees would increase by 48%
(Majority of storm water permits would increase to $363/year and average process water fee would increase to $1063/year)



Future Resource Needs

In addition to the immediate FTE needs outlined above, the Division has identified the need for an additional 34.5 FTE over the next 3 years. The

following chart summarizes the needs by Program for years two and three. Attachment 1 to this document provides a brief narrative description of the FTE needs by program for years two and three.

PROGRAMS	FTE/COSTS	YEAR 2	YEAR 3
Administration	Estimated FTE	1.5	4.0
	Estimated Cost	$57,010	$155,628
Clean Water Programs	Estimated FTE	9.0	5.0
	Estimated Cost	$598,997	$331,720
Drinking Water Program	Estimated FTE	6.0	9.0
	Estimated Cost	$362,649	$608,412

Summary

Protection of Colorado's waters is critical to the continued development of the State, and to the quality of life the state offers to its citizens. The Division plays a critical role in the protection of the State's streams, lakes and reservoirs and in assuring that the citizens of Colorado have safe water to drink. For the Division to continue to be successful in fulfilling that role, additional staffing resources will be required in the face of increasing demands and pressures.

Future Resources Needs Attachment 1

Administration								
Unit or Section	Year 2				Year 3			
	Class	Brief Narrative	FTE	Amount	Class	Brief Narrative	FTE	Amount
Fiscal Support and Business Services					AA III	Division wide administrative support	1.0	$38,797
					Accounting Tech III	Fiscal Billing Coordinator, purchase agent and Kronos support	1.0	$40,872
Business Data Resources Unit	AA I	Implementation and maintenance of the automation of Division's Record Center Support	1.0	$28,351	Data Specialist	Enter analytical data and provide customer support for electronic data submittal	2.0	$75,959
	PSRS I	Geographical Information Systems and analysis of spatial and statistical environmental data	0.5	$28,659				
Division Wide		Operating costs associated with IT hardware support including servers, disaster recovery, automation of Records Center, system upgrades, establish/maintain web presences, increase bandwidth, and automate submission of electronic documents		$100,000				$100,000
Total			1.5	$57,010			4.0	$155,628

Clean Water Program – Water Pollution Control								
Unit or Section	Year 2				Year 3			
	Class	Brief Narrative	FTE	Amount	Class	Brief Narrative	FTE	Amount
Permits	EPS II	Master General Permit Writer	1.0	$66,344	EPS II	Stormwater Permit Writer	1.0	$66,344
Compliance Assurance	EPS II	Biosolids/Reuse Compliance-Enforcement	1.0	$66,344				
	EPS II	Pesticide Compliance/Enforcement	1.0	$66,344				
	GP III	Legal Assistant	0.5	$26,081				
	EPS IV	Shared CW/DW Unit Mgr.	0.5	$43,270	EPS II	Pesticide Permit Compliance	1.0	$66,344
Engineering	PE I	Pesticide Field Inspector	1.0	$73,107				
	EPS II	Sampling Coordinator	0.5	$33,172				
	E/PST II	Sampler	0.5	$25,304				
Total			6.0	$399,965			2.0	$132,688

Clean Water Program – Watershed								
Unit or Section	Year 2				Year 3			
	Class	Brief Narrative	FTE	Amount	Class	Brief Narrative	FTE	Amount
Environmental Data Unit	PSRS II	Rivers/streams and lakes/reservoir sampling and trend assessment	1.0	$66,344	PSRS II	Aquatic life and wetlands sampling and data assessment	0.5	$33,172
					PSRS II	Implement aquatic biological and nutrient criteria in Regulation No. 93	0.5	$33,172
Standards Unit	PSRS II	Site-specific standards - Copper, Ammonia, Temperature	1.0	$66,344	PSRS II	Wetlands criteria/standards; aquatic life use attainability analyses	1.0	$66,344
Restoration and Protection Unit	PSRS II	TMDL Development – Aquatic life focus	1.0	$66,344	PSRS II	TMDL Development – Lakes/nutrients focus	1.0	$66,344
Total			3.0	$199,032			3.0	$199,032

Drinking Water Program								
Unit or Section	Year 2				Year 3			
	Class	Brief Narrative	FTE	Amount	Class	Brief Narrative	FTE	Amount
Capacity Building	EPS II	Capacity coach - Provide assistance to water systems	2.0	$132,688	EPS II	Capacity coach - Provide assistance to water systems	2.0	$132,688

Compliance	EPS III	Compliance with new rules including surface water treatment, disinfection byproducts, lead and copper, and groundwater rule	1.0	$66,344	E/PS Tech II	Compliance with new rules including surface water treatment, disinfection byproducts, lead and copper, and groundwater rule	1.0	$50,608
	AA III	Administrative Assistance	1.0	$38,797	EPS II	Assist systems under enforcement	1.0	$66,344
Engineering	EPS II	Sampling Coordinator	0.5	$33,172	PE I	Inspections/design reviews	4.0	$292,428
	E/PS Tech II	Sampling	0.5	$25,304	EPS II	Swim Pools	1.0	
	EPS II	Swim Pools	1.0	$66,344				$66,344
Total			6.0	$362,649			9.0	$608,412