



PPU Stakeholder Group

Julie Tinetti

Representative for: Plum Creek Water Reclamation Authority

Phone: (303) 688-1991

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Each number (from 1-5) next to a question denotes that person's level of agreement with that question. One denoted that they strongly disagreed and choosing five denoted they strongly agreed with the question. If there was no number, the person did not answer that question.

Did you attend the PPU workgroup meetings?: Yes

DOMESTIC WASTEWATER TREATMENT WORKS (DWWTWS)

DWWTW Scenario 1: 2
DWWTW Scenario 2: 2
DWWTW Scenario 3: 5

Cat./ Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1		Scenario 2		Scenario 3	
01-01	0 to <1 MGD	439	Range	Equation: \$804 + \$4525 * Flow (MGD)	\$804 to \$5,284	Equation: \$800 + \$4500 * Flow (MGD)	\$800 to \$5,255	Equation: \$670 + \$3500 * Flow (MGD)	\$670 to \$4,135
01-02	>= 1 MGD to 2.5 MGD	41	Set amount	\$8,228		\$8,191		\$6,638	
01-03	>= 2.5 MGD to 10 MGD	39	Set amount	\$15,415		\$15,346		\$12,437	
01-04	>= 10 MGD to 50 MGD	10	Set amount	\$26,723		\$26,604		\$21,560	
01-05	>= 50 MGD to 100 MGD	2	Set amount	\$30,830		\$30,693		\$24,874	
01-06	>= 100 MGD	1	Set amount	\$33,910		\$33,760		\$27,359	

DWWTW Comments:

There is no work product associated with these fees so why are the fees so high?

WATER TREATMENT PLANTS

Scenario1: 5
Scenario2: 5
Scenario3: 1

Cat./Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1	Scenario 2	Scenario 3
02-01	Individual permits	10	Set amount	\$6,313	\$6,246	\$3,400
02-02	General permits	94	Set amount	\$1,006	\$1,000	\$750

Water Treatment Plant Comments:

Water treatment plants fees should align more closely to wastewater treatment facility fees.

PRETREATMENT

Pretreatment Scenario 1: 4
Pretreatment Scenario 2: 4
Pretreatment Scenario 3: 4

Cat./ Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1	Scenario 2	Scenario 3
04-01	Division approved POTW	2	Set amount added to permit annual fee	\$2,413	\$2,400	\$2,400
04-02	EPA approved and unapproved POTW <1 MGD	213	Set amount added to permit annual fee	\$151	\$150	\$130
04-03	EPA approved and unapproved POTW >= 1 MGD	94	Set amount added to permit annual fee	\$503	\$500	\$400
04-04	Division-authorized Significant Industrial User	10	Set amount	\$1,006	\$1,000	\$700

Pretreatment Comments:

BIOSOLIDS

	With New Services	Without New Services
Scenario 1:	1	5
Scenario 2:	1	1
Scenario 3:	1	1

Cat./ Sub-cat.	Cat/Sub-Cat Description	No. of Entities	Fee method	Scenario 1		Scenario 2		Scenario 3	
				incl. new services	no new services	incl. new services	no new services	incl. new services	no new services
03-01	Beneficial reuse	92	Equation:	\$3.82 per dry ton	\$2.51 per dry ton	\$3.80 per dry ton	\$2.50 per dry ton	\$2.70 per dry ton	\$2.05 per dry ton
			Range	\$80 to \$90,057	\$80 to \$59,173	\$80 to \$89,585	\$80 to \$58,938	\$80 to \$63,653	\$80 to \$48,329
03-02	DWWTWs (generators) <30 dry tons	441	Set amount	\$121	\$35	\$120	\$35	\$78	\$35
03-03	DWWTWs (generators) >= 30 dry tons	92	Set amount	\$804	\$35	\$800	\$35	\$420	\$35

Biosolids Comments:

How are these fees for biosolids helping the overall goal of increasing revenue for the WQCD?

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RECLAIMED WATER

	With New Services	Without New Services
Scenario 1:	4	2
Scenario 2:	4	2
Scenario 3:	4	2

Cat./ Sub-cat.	Cat/Sub-Cat Description	No. of Entities	Fee method	Scenario 1		Scenario 2		Scenario 3	
				<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>
05-01	0 to <1 MGD	8	Equation	\$855 + \$4,022 * Flow (MGD)	\$704 + \$3,018 * Flow (MGD)	\$850 + \$4,000 * Flow (MGD)	\$700 + \$3,000 * Flow (MGD)	\$550 + \$2,200 * Flow (MGD)	\$450 + \$1,900 * Flow (MGD)
			Range	\$855 to \$4,837	\$704 to \$3,692	\$850 to \$4,810	\$700 to \$3,670	\$550 to \$2,728	\$450 to \$2,331
05-02	>= 1 MGD	16	Equation	\$4,525 + \$377 * Flow (MGD)	\$3,621 + \$251 * Flow (MGD)	\$4,500 + \$375 * Flow (MGD)	\$3,600 + \$250 * Flow (MGD)	\$3,100 + \$200 * Flow (MGD)	\$2,500 + \$140 * Flow (MGD)
			Range	\$4,902 to \$15,835	\$3,872 to \$11,151	\$4,875 to \$15,750	\$3,850 to \$11,100	\$3,300 to \$9,100	\$2,640 to \$6,700

Reclaimed Water Comments:

SITE APPLICATIONS AND DESIGN REVIEW

Scenario 1: 4
 Scenario 2: 4
 Scenario 3: 4

	Scenario 1	Scenario 2	Scenario 3
Site applications and design review: percent change	35.1%	34.5%	9%

Site Application & Design Review Comments:

PRELIMINARY EFFLUENT LIMITATIONS (PELS)

Low complexity service: 4
 Medium/low complexity service: 4
 Medium complexity service: 4
 High to very high complexity service: 4

Service Type	Application Fee	Anticipated Actions
Low complexity	\$600 (application)	Groundwater PELs
Medium/low complexity	\$1,100 (application)	Groundwater PELs with analysis of ambient groundwater levels.
Medium complexity	\$3,800 (application)	Surface water PELs, DWWTWs minors.
High to very high complexity	\$3,800 with application, additional - refer to hourly rate below.	Surface water PELs, DWWTW majors. Surface water PELs, water treatment plant reverse osmosis discharge.

PELs Comments

PCWRA is not in favor of being charged by the hour due to the variety of experience levels at the Division.

DISCHARGE PERMIT APPLICATIONS, APPLICATION SUPPLEMENTS AND PERMIT MODIFICATIONS

Applications and supplementals: fee is 50 percent of the annual fee. 4
 Permit modifications: fee of 25 percent for minor amendments and 50 percent for major amendments. 4

Discharge Permit Comments:

A LA CARTE

Compliance assistance: 5
 Administrative Action: 4
 Low complexity service: 4
 Medium/low complexity service: 4
 Medium complexity service: 4
 High to very high complexity service: 4

Service Type	Application Fee	Example Actions
Compliance assistance	no fee	• Compliance assistance inspection or audit, upon request
Administrative action	\$80	• Permit transfer • NOX • Minor permit modification (removal of an outfall)
Low complexity service	\$600	• Regulatory exemption, confirmation of lagoon seepage rate
Medium/low complexity service	\$1,100	• Not anticipated at this time for PPU.
Medium complexity service	\$3,800	• Not anticipated at this time for PPU.
High to very high complexity service	\$3,800 submitted with application, additional - see hourly rates above	• Not anticipated at this time for PPU.

A la carte Comments:

PCWRA is not in favor of being charged by the hour due to the variety of experience levels at the Division.

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WORK GROUP RECOMMENDATIONS

1. Add accountability metrics to break information in to another level of detail by program area (e.g. biosolids, reuse, and pretreatment) to the WQCC annual report. 5
2. Ensure annual fees cover services including FAQs, application guidance, sample applications, permit requirement summaries/training (post-issuance consultation included), common failures/issues document and compliance forum at existing levels. 5
3. Include pre-issuance and/or pre-notice consultation in the annual fee packaged services. 5
4. Set a statutory fee cap for reclaimed water. Actual fees for program decided during triennial review. 5
5. For reclaimed water, fees are scaled on flow however an additional fee should be applied on a per user basis based on work load of compliance activities. 5
6. For reclaimed water, new services fees for this subsector are set to provide funding for approximately 300 hours. The recommendation is to increase from 300 to 600 for other reclaimed water services such as low risk discharge policy development or more streamlined approval of new uses. Add additional resources to the division to increase timeliness of NOAs. 5
7. Consider active replenishment of fund balance as a viable scenario (Scenario 5). 2

Recommendation Comments

POLICY CONSIDERATIONS FOR OVERALL SUCCESS

In developing concepts for a fee structure, stakeholders identified the need to strike a balance between certainty and flexibility. A more certain structure, for example, one with dollars in statute has trades offs in the ability to evolve services and spend additional time on complex issues. A more flexible system can result in a higher rate of change in fee amounts. Accountability was also an important concept expressed by stakeholders.

1. Certainty: 3
2. Flexibility: 5
3. Accountability: 1
4. Rationale for setting fees: 4
5. Subsidies for permit holders: 2
6. What do you think is an appropriate frequency to review fees and fee structure? (Select one): 5 Years
If selected Other, please explain:
7. What do you think is the best manner to adjust for inflation?: To reassess the fee structure every 5 years

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Statute v. Commission

There are a number of considerations when assessing the roles of the Water Quality Control Commission and statutory authority. A different solution may be appropriate for each sector.

- 1. Fees established by the Water Quality Control Commission. 1
- 2. Fees established in statute with a statutory cap and periodic adjustment made as necessary by the Water Quality Control Commission. 1
- 3. A la carte services and fees established and managed by the Water Quality Control Commission. 1
- 4. A la carte services and fees established in statute. 4
- 5. Fee formulas in statute. 5
- 6. Fees in statute with an inflation clause. 5
- 7. Fees in statute without an adjustment for inflation (current model). 5

Fee Comments

General Fund

There are different schools of thought for how general fund should be distributed in the Clean Water Program that range from no general fund to completely funded with general fund dollars.

- 1. The division has the discretion to spend as needed. 1
- 2. The only permit holders to receive general fund are those which involve governmental entities such as public utilities, local governments, or state agencies (e.g. Colorado Department of Transportation). 3
- 3. All permit holders receive some general funds but it should largely go to governmental entities. 5
- 4. All permit holders receive equal distribution based on a percentage. 4
- 5. All permit holders receive a percentage based on the department's discretion and other to be determined factors. 1
- 6. No permit holder general fund as it should be a completely cash funded program. 5
- 7. Only small public and private entities receive general fund. 1
- 8. Allocate general fund to program areas or permit activities with small numbers of permittees to keep fees reasonable. 1

General Fund Comments

PCWRA finds the language in #3 misleading. The general funds are going to CDPHE, not the permit holders.

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Final Ratings

- 1. Small workgroup meetings were helpful in increasing my understanding of sector specific fees and having dialogue about how to improve the fee structure for the specific group. 4
- 2. Large group meetings were helpful in understanding the department's position and providing an avenue for large group discussion on cross cutting topics of interest. 3
- 3. Meeting materials increased my overall level of understanding about the history of CleanWater Program fees and their history, overall department and division funding and how the division manages clean water program permitted activities. 4
- 4. Facilitation was effective and objective. 4
- 5. This process was successful at creating a trusting, open atmosphere to discuss issues of interest. 4
- 6. This process was helpful in building professional relationships with peers that I did not have before this process. 2

Final Comments

Warren Mesloh

Representative for: North Front Range Water Quality Planning: Larimer & Weld (Group)

Phone: 970 962 2785

Email: warrenmesloh@nfrwqpa.org

Each number (from 1-5) next to a question denotes that person's level of agreement with that question. One denoted that they strongly disagreed and choosing five denoted they strongly agreed with the question. If there was no number, the person did not answer that question.

Did you attend the PPU workgroup meetings?: Yes

DOMESTIC WASTEWATER TREATMENT WORKS (DWWTWS)

DWWTW Scenario 1: 3

DWWTW Scenario 2: 2

DWWTW Scenario 3: 4

Cat./ Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1		Scenario 2		Scenario 3	
01-01	0 to <1 MGD	439	Range	Equation: \$804 + \$4525 * Flow (MGD)	\$804 to \$5,284	Equation: \$800 + \$4500 * Flow (MGD)	\$800 to \$5,255	Equation: \$670 + \$3500 * Flow (MGD)	\$670 to \$4,135
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01-05	>= 50 MGD to 100 MGD	2	Set amount	\$30,830		\$30,693		\$24,874	
01-06	>= 100 MGD	1	Set amount	\$33,910		\$33,760		\$27,359	

DWWTW Comments:

The foregoing comments on Scenarios 1,2 & 3 represent comments received from smaller towns in our organization (<1.0 mgd). The larger Cities in Larimer and Weld County who commented did so directly and are not represented herein.

WATER TREATMENT PLANTS

Scenario1: 3

Scenario2: 2

Scenario3: 4

Cat./Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1	Scenario 2	Scenario 3
02-01	Individual permits	10	Set amount	\$6,313	\$6,246	\$3,400
02-02	General permits	94	Set amount	\$1,006	\$1,000	\$750

Water Treatment Plant Comments:

PRETREATMENT

Pretreatment Scenario 1:

Pretreatment Scenario 2:

Pretreatment Scenario 3:

Cat./ Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1	Scenario 2	Scenario 3
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04-04	Division-authorized Significant Industrial User	10	Set amount	\$1,006	\$1,000	\$700

Pretreatment Comments:

No comments were received on Pretreatment from the small plant group as they generally do not have pretreatment permit requirements

BIOSOLIDS

	With New Services	Without New Services
Scenario 1:	1	2
Scenario 2:	1	2
Scenario 3:	1	4

Cat./ Sub-cat.	Cat/Sub-Cat Description	No. of Entities	Fee method	Scenario 1		Scenario 2		Scenario 3	
				incl. new services	no new services	incl. new services	no new services	incl. new services	no new services
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Biosolids Comments:

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RECLAIMED WATER

With New Services Without New Services

Scenario 1:

Scenario 2:

Scenario 3:

Cat./ Sub-cat.	Cat/Sub-Cat Description	No. of Entities	Fee method	Scenario 1		Scenario 2		Scenario 3	
				incl. new services	no new services	incl. new services	no new services	incl. new services	no new services
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			Range	\$4,902 to \$15,835	\$3,872 to \$11,151	\$4,875 to \$15,750	\$3,850 to \$11,100	\$3,300 to \$9,100	\$2,640 to \$6,700

Reclaimed Water Comments:

No Comments recieved

SITE APPLICATIONS AND DESIGN REVIEW

Scenario 1: 2

Scenario 2: 2

Scenario 3: 4

	Scenario 1	Scenario 2	Scenario 3
Site applications and design review: percent change	35.1%	34.5%	9%

Site Application & Design Review Comments:

PRELIMINARY EFFLUENT LIMITATIONS (PELs)

Low complexity service: 4

Medium/low complexity service: 4

Medium complexity service: 4

High to very high complexity service: 3

Service Type	Application Fee	Anticipated Actions
Low complexity	\$600 (application)	Groundwater PELs
Medium/low complexity	\$1,100 (application)	Groundwater PELs with analysis of ambient groundwater levels.
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PELs Comments

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Applications and supplementals: fee is 50 percent of the annual fee. 3

Permit modifications: fee of 25 percent for minor amendments and 50 percent for major amendments. 3

Discharge Permit Comments:

A LA CARTE

Compliance assistance: 5

Administrative Action: 3

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High to very high complexity service: 2

Service Type	Application Fee	Example Actions
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Medium/low complexity service	\$1,100	• Not anticipated at this time for PPU.
Medium complexity service	\$3,800	• Not anticipated at this time for PPU.
High to very high complexity service	\$3,800 submitted with application, additional - see hourly rates above	• Not anticipated at this time for PPU.

A la carte Comments:

In discussions of the ala carte in our group, there is difficulty getting their arms around this process which then leads to some skepticism on its application.

Warren Mesloh

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& Weld (Group)

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2. Ensure annual fees cover services including FAQs, application guidance, sample applications, permit requirement summaries/training (post-issuance consultation included), common failures/issues document and compliance forum at existing levels. 4
3. Include pre-issuance and/or pre-notice consultation in the annual fee packaged services. 4
4. Set a statutory fee cap for reclaimed water. Actual fees for program decided during triennial review. 3
5. For reclaimed water, fees are scaled on flow however an additional fee should be applied on a per user basis based on work load of compliance activities. 2
6. For reclaimed water, new services fees for this subsector are set to provide funding for approximately 300 hours. The recommendation is to increase from 300 to 600 for other reclaimed water services such as low risk discharge policy development or more streamlined approval of new uses. Add additional resources to the division to increase timeliness of NOAs.
7. Consider active replenishment of fund balance as a viable scenario (Scenario 5).

Recommendation Comments

POLICY CONSIDERATIONS FOR OVERALL SUCCESS

In developing concepts for a fee structure, stakeholders identified the need to strike a balance between certainty and flexibility. A more certain structure, for example, one with dollars in statute has trades offs in the ability to evolve services and spend additional time on complex issues. A more flexible system can result in a higher rate of change in fee amounts. Accountability was also an important concept expressed by stakeholders.

1. Certainty: 2
 2. Flexibility: 4
 3. Accountability: 1
 4. Rationale for setting fees: 2
 5. Subsidies for permit holders: 1
 6. What do you think is an appropriate frequency to review fees and fee structure? (Select one): 3 Years
- If selected Other, please explain:
7. What do you think is the best manner to adjust for inflation?:

Warren Mesloh

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Statute v. Commission

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2. Fees established in statute with a statutory cap and periodic adjustment made as necessary by the Water Quality Control Commission. 3
3. A la carte services and fees established and managed by the Water Quality Control Commission. 2
4. A la carte services and fees established in statute. 4
5. Fee formulas in statute. 4
6. Fees in statute with an inflation clause. 2
7. Fees in statute without an adjustment for inflation (current model). 4

Fee Comments

General Fund

There are different schools of thought for how general fund should be distributed in the Clean Water Program that range from no general fund to completely funded with general fund dollars.

1. The division has the discretion to spend as needed. 2
2. The only permit holders to receive general fund are those which involve governmental entities such as public utilities, local governments, or state agencies (e.g. Colorado Department of Transportation). 3
3. All permit holders receive some general funds but it should largely go to governmental entities. 4
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6. No permit holder general fund as it should be a completely cash funded program. 1
7. Only small public and private entities receive general fund. 5
8. Allocate general fund to program areas or permit activities with small numbers of permittees to keep fees reasonable. 4

General Fund Comments

Final Ratings

1. Small workgroup meetings were helpful in increasing my understanding of sector specific fees and having dialogue about how to improve the fee structure for the specific group. 5
2. Large group meetings were helpful in understanding the department's position and providing an avenue for large group discussion on cross cutting topics of interest. 5
3. Meeting materials increased my overall level of understanding about the history of Clean Water Program fees and their history, overall department and division funding and how the division manages clean water program permitted activities. 5
4. Facilitation was effective and objective. 5
5. This process was successful at creating a trusting, open atmosphere to discuss issues of interest. 4
6. This process was helpful in building professional relationships with peers that I did not have before this process. 3

Final Comments

Warren Mesloh

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& Weld (Group)

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Carrie Gudorf

Representative for: Mesa County

Phone: 970-244-1811

Email: Carrie.Gudorf@mesacounty.us

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Did you attend the PPU workgroup meetings?: Yes

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	01-06	1	Set amount	\$33,910		\$33,760		\$27,359	

DWWTW Comments:

We would like no new fees.

WATER TREATMENT PLANTS

Scenario	Cat./Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1	Scenario 2	Scenario 3
Scenario1:	02-01	Individual permits	10	Set amount	\$6,313	\$6,246	\$3,400
Scenario2:							
Scenario3:	02-02	General permits	94	Set amount	\$1,006	\$1,000	\$750

Water Treatment Plant Comments:

PRETREATMENT

Scenario	Cat./ Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1	Scenario 2	Scenario 3
Pretreatment Scenario 1:	04-01	Division approved POTW	2	Set amount added to permit annual fee	\$2,413	\$2,400	\$2,400
Pretreatment Scenario 2:	04-02	EPA approved and unapproved POTW <1 MGD	213	Set amount added to permit annual fee	\$151	\$150	\$130
Pretreatment Scenario 3:	04-03	EPA approved and unapproved POTW >= 1 MGD	94	Set amount added to permit annual fee	\$503	\$500	\$400
Pretreatment Comments:	04-04	Division-authorized Significant Industrial User	10	Set amount	\$1,006	\$1,000	\$700

BIOSOLIDS

Scenario	With New Services	Without New Services	Cat./ Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee method	Scenario 1		Scenario 2		Scenario 3	
							incl. new services	no new services	incl. new services	no new services	incl. new services	no new services
Scenario 1:	1	1	03-01	Beneficial reuse	92	Equation:	\$3.82 per dry ton	\$2.51 per dry ton	\$3.80 per dry ton	\$2.50 per dry ton	\$2.70 per dry ton	\$2.05 per dry ton
Scenario 2:	1	1				Range	\$80 to \$90,057	\$80 to \$59,173	\$80 to \$89,585	\$80 to \$58,938	\$80 to \$63,653	\$80 to \$48,329
Scenario 3:	2	2	03-02	DWWTWs (generators) <30 dry tons	441	Set amount	\$121	\$35	\$120	\$35	\$78	\$35
Biosolids Comments:			03-03	DWWTWs (generators) >= 30 dry tons	92	Set amount	\$804	\$35	\$800	\$35	\$420	\$35

Biosolids Comments:

We would like no new fees.

Carrie Gudorf

Representative for: Mesa County

Phone: 970-244-1811

Email: Carrie.Gudorf@mesacounty.us

Each number (from 1-5) next to a question denotes that person's level of agreement with that question. One denoted that they strongly disagreed and choosing five denoted they strongly agreed with the question. If there was no number, the person did not answer that question.

RECLAIMED WATER

With New Services Without New Services

Scenario 1:

Scenario 2:

Scenario 3:

Reclaimed Water Comments:

Cat./ Sub-cat.	Cat/Sub-Cat Description	No. of Entities	Fee method	Scenario 1		Scenario 2		Scenario 3	
				incl. new services	no new services	incl. new services	no new services	incl. new services	no new services
05-01	0 to <1 MGD	8	Equation	\$855 + \$4,022 * Flow (MGD)	\$704 + \$3,018 * Flow (MGD)	\$850 + \$4,000 * Flow (MGD)	\$700 + \$3,000 * Flow (MGD)	\$550 + \$2,200 * Flow (MGD)	\$450 + \$1,900 * Flow (MGD)
			Range	\$855 to \$4,837	\$704 to \$3,692	\$850 to \$4,810	\$700 to \$3,670	\$550 to \$2,728	\$450 to \$2,331
05-02	>= 1 MGD	16	Equation	\$4,525 + \$377 * Flow (MGD)	\$3,621 + \$251 * Flow (MGD)	\$4,500 + \$375 * Flow (MGD)	\$3,600 + \$250 * Flow (MGD)	\$3,100 + \$200 * Flow (MGD)	\$2,500 + \$140 * Flow (MGD)
			Range	\$4,902 to \$15,835	\$3,872 to \$11,151	\$4,875 to \$15,750	\$3,850 to \$11,100	\$3,300 to \$9,100	\$2,640 to \$6,700

SITE APPLICATIONS AND DESIGN REVIEW

Scenario 1: 1

Scenario 2: 1

Scenario 3: 2

Site Application & Design Review Comments:

We would like no new fees.

	Scenario 1	Scenario 2	Scenario 3
Site applications and design review: percent change	35.1%	34.5%	9%

PRELIMINARY EFFLUENT LIMITATIONS (PELs)

Low complexity service: 1

Medium/low complexity service: 1

Medium complexity service: 1

High to very high complexity service: 1

PELs Comments

We would like no new fees. Our small plants can't afford \$3,800.

Service Type	Application Fee	Anticipated Actions
Low complexity	\$600 (application)	Groundwater PELs
Medium/low complexity	\$1,100 (application)	Groundwater PELs with analysis of ambient groundwater levels.
Medium complexity	\$3,800 (application)	Surface water PELs, DWWTWS minors.
High to very high complexity	\$3,800 with application, additional - refer to hourly rate below.	Surface water PELs, DWWTW majors. Surface water PELs, water treatment plant reverse osmosis discharge.

DISCHARGE PERMIT APPLICATIONS, APPLICATION SUPPLEMENTS AND PERMIT MODIFICATIONS

Applications and supplementals: fee is 50 percent of the annual fee. 3

Permit modifications: fee of 25 percent for minor amendments and 50 percent for major amendments. 3

Discharge Permit Comments:

A LA CARTE

Compliance assistance: 3

Administrative Action: 3

Low complexity service: 3

Medium/low complexity service: 3

Medium complexity service: 3

High to very high complexity service: 3

A la carte Comments:

Service Type	Application Fee	Example Actions
Compliance assistance	no fee	• Compliance assistance inspection or audit, upon request
Administrative action	\$80	• Per mit transfer • NOX • Minor permit modification (removal of an outfall)
Low complexity service	\$600	• Regulatory exemption, confirmation of lagoon seepage rate
Medium/low complexity service	\$1,100	• Not anticipated at this time for PPU.
Medium complexity service	\$3,800	• Not anticipated at this time for PPU.
High to very high complexity service	\$3,800 submitted with application, additional - see hourly rates above	• Not anticipated at this time for PPU.

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WORK GROUP RECOMMENDATIONS

1. Add accountability metrics to break information in to another level of detail by program area (e.g. biosolids, reuse, and pretreatment) to the WQCC annual report. 5
2. Ensure annual fees cover services including FAQs, application guidance, sample applications, permit requirement summaries/training (post-issuance consultation included), common failures/issues document and compliance forum at existing levels. 1
3. Include pre-issuance and/or pre-notice consultation in the annual fee packaged services. 4
4. Set a statutory fee cap for reclaimed water. Actual fees for program decided during triennial review. 3
5. For reclaimed water, fees are scaled on flow however an additional fee should be applied on a per user basis based on work load of compliance activities. 3
6. For reclaimed water, new services fees for this subsector are set to provide funding for approximately 300 hours. The recommendation is to increase from 300 to 600 for other reclaimed water services such as low risk discharge policy development or more streamlined approval of new uses. Add additional resources to the division to increase timeliness of NOAs. 3
7. Consider active replenishment of fund balance as a viable scenario (Scenario 5). 1

Recommendation Comments

The fees should be kept in the statute.

POLICY CONSIDERATIONS FOR OVERALL SUCCESS

In developing concepts for a fee structure, stakeholders identified the need to strike a balance between certainty and flexibility. A more certain structure, for example, one with dollars in statute has trades offs in the ability to evolve services and spend additional time on complex issues. A more flexible system can result in a higher rate of change in fee amounts. Accountability was also an important concept expressed by stakeholders.

1. Certainty: 1
2. Flexibility: 5
3. Accountability: 4
4. Rationale for setting fees: 2
5. Subsidies for permit holders: 3
6. What do you think is an appropriate frequency to review fees and fee structure? (Select one): 5 Years

If selected Other, please explain:

7. What do you think is the best manner to adjust for inflation?: We need to live within our means. Western Colorado is still struggling to recover from the recession. Efficiencies need to be found within the CDPHE.

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Statute v. Commission

There are a number of considerations when assessing the roles of the Water Quality Control Commission and statutory authority. A different solution may be appropriate for each sector.

- 1. Fees established by the Water Quality Control Commission. 1
- 2. Fees established in statute with a statutory cap and periodic adjustment made as necessary by the Water Quality Control Commission. 1
- 3. A la carte services and fees established and managed by the Water Quality Control Commission. 1
- 4. A la carte services and fees established in statute. 5
- 5. Fee formulas in statute. 4
- 6. Fees in statute with an inflation clause. 2
- 7. Fees in statute without an adjustment for inflation (current model). 5

Fee Comments

General Fund

There are different schools of thought for how general fund should be distributed in the Clean Water Program that range from no general fund to completely funded with general fund dollars.

- 1. The division has the discretion to spend as needed. 2
- 2. The only permit holders to receive general fund are those which involve governmental entities such as public utilities, local governments, or state agencies (e.g. Colorado Department of Transportation). 4
- 3. All permit holders receive some general funds but it should largely go to governmental entities. 4
- 4. All permit holders receive equal distribution based on a percentage. 3
- 5. All permit holders receive a percentage based on the department's discretion and other to be determined factors. 1
- 6. No permit holder general fund as it should be a completely cash funded program. 1
- 7. Only small public and private entities receive general fund. 1
- 8. Allocate general fund to program areas or permit activities with small numbers of permittees to keep fees reasonable. 2

General Fund Comments

Final Ratings

- 1. Small workgroup meetings were helpful in increasing my understanding of sector specific fees and having dialogue about how to improve the fee structure for the specific group. 4
- 2. Large group meetings were helpful in understanding the department's position and providing an avenue for large group discussion on cross cutting topics of interest. 4
- 3. Meeting materials increased my overall level of understanding about the history of Clean Water Program fees and their history, overall department and division funding and how the division manages clean water program permitted activities. 4
- 4. Facilitation was effective and objective. 2
- 5. This process was successful at creating a trusting, open atmosphere to discuss issues of interest. 2
- 6. This process was helpful in building professional relationships with peers that I did not have before this process. 4

Final Comments

Carrie Gudorf

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Ginny Johnson

Representative for: Colorado Springs Utilities (Individual)

Phone: 719/668-4375

Email: vjohnson@csu.org

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Did you attend the PPU workgroup meetings?: Yes

DOMESTIC WASTEWATER TREATMENT WORKS (DWWTWS)

DWWTW Scenario 1:	2	<table border="1"> <thead> <tr> <th>Cat./ Sub-Cat.</th> <th>Cat/Sub-Cat. Description</th> <th>No. of Entities</th> <th>Fee Methodology</th> <th colspan="2">Scenario 1</th> <th colspan="2">Scenario 2</th> <th colspan="2">Scenario 3</th> </tr> </thead> <tbody> <tr> <td>01-01</td> <td>0 to <1 MGD</td> <td>439</td> <td>Range</td> <td>Equation: \$804 + \$4525 * Flow (MGD)</td> <td>\$804 to \$5,284</td> <td>Equation: \$800 + \$4500 * Flow (MGD)</td> <td>\$800 to \$5,255</td> <td>Equation: \$670 + \$3500 * Flow (MGD)</td> <td>\$670 to \$4,135</td> </tr> <tr> <td>01-02</td> <td>>= 1 MGD to 2.5 MGD</td> <td>41</td> <td>Set amount</td> <td colspan="2">\$8,228</td> <td colspan="2">\$8,191</td> <td colspan="2">\$6,638</td> </tr> <tr> <td>01-03</td> <td>>= 2.5 MGD to 10 MGD</td> <td>39</td> <td>Set amount</td> <td colspan="2">\$15,415</td> <td colspan="2">\$15,346</td> <td colspan="2">\$12,437</td> </tr> <tr> <td>01-04</td> <td>>= 10 MGD to 50 MGD</td> <td>10</td> <td>Set amount</td> <td colspan="2">\$26,723</td> <td colspan="2">\$26,604</td> <td colspan="2">\$21,560</td> </tr> <tr> <td>01-05</td> <td>>= 50 MGD to 100 MGD</td> <td>2</td> <td>Set amount</td> <td colspan="2">\$30,830</td> <td colspan="2">\$30,693</td> <td colspan="2">\$24,874</td> </tr> <tr> <td>01-06</td> <td>>= 100 MGD</td> <td>1</td> <td>Set amount</td> <td colspan="2">\$33,910</td> <td colspan="2">\$33,760</td> <td colspan="2">\$27,359</td> </tr> </tbody> </table>	Cat./ Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1		Scenario 2		Scenario 3		01-01	0 to <1 MGD	439	Range	Equation: \$804 + \$4525 * Flow (MGD)	\$804 to \$5,284	Equation: \$800 + \$4500 * Flow (MGD)	\$800 to \$5,255	Equation: \$670 + \$3500 * Flow (MGD)	\$670 to \$4,135	01-02	>= 1 MGD to 2.5 MGD	41	Set amount	\$8,228		\$8,191		\$6,638		01-03	>= 2.5 MGD to 10 MGD	39	Set amount	\$15,415		\$15,346		\$12,437		01-04	>= 10 MGD to 50 MGD	10	Set amount	\$26,723		\$26,604		\$21,560		01-05	>= 50 MGD to 100 MGD	2	Set amount	\$30,830		\$30,693		\$24,874		01-06	>= 100 MGD	1	Set amount	\$33,910		\$33,760		\$27,359	
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WATER TREATMENT PLANTS

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Water Treatment Plant Comments:

PRETREATMENT

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RECLAIMED WATER

	With New Services	Without New Services	<table border="1"> <thead> <tr> <th rowspan="2">Cat./ Sub-cat.</th> <th rowspan="2">Cat/Sub-Cat Description</th> <th rowspan="2">No. of Entities</th> <th rowspan="2">Fee method</th> <th colspan="2">Scenario 1</th> <th colspan="2">Scenario 2</th> <th colspan="2">Scenario 3</th> </tr> <tr> <th><i>incl. new services</i></th> <th><i>no new services</i></th> <th><i>incl. new services</i></th> <th><i>no new services</i></th> <th><i>incl. new services</i></th> <th><i>no new services</i></th> </tr> </thead> <tbody> <tr> <td rowspan="2">05-01</td> <td rowspan="2">0 to <1 MGD</td> <td rowspan="2">8</td> <td>Equation</td> <td>\$855 + \$4,022 * Flow (MGD)</td> <td>\$704 + \$3,018 * Flow (MGD)</td> <td>\$850 + \$4,000 * Flow (MGD)</td> <td>\$700 + \$3,000 * Flow (MGD)</td> <td>\$550 + \$2,200 * Flow (MGD)</td> <td>\$450 + \$1,900 * Flow (MGD)</td> </tr> <tr> <td>Range</td> <td>\$855 to \$4,837</td> <td>\$704 to \$3,692</td> <td>\$850 to \$4,810</td> <td>\$700 to \$3,670</td> <td>\$550 to \$2,728</td> <td>\$450 to \$2,331</td> </tr> <tr> <td rowspan="2">05-02</td> <td rowspan="2">>= 1 MGD</td> <td rowspan="2">16</td> <td>Equation</td> <td>\$4,525 + \$377 * Flow (MGD)</td> <td>\$3,621 + \$251 * Flow (MGD)</td> <td>\$4,500 + \$375 * Flow (MGD)</td> <td>\$3,600 + \$250 * Flow (MGD)</td> <td>\$3,100 + \$200 * Flow (MGD)</td> <td>\$2,500 + \$140 * Flow (MGD)</td> </tr> <tr> <td>Range</td> <td>\$4,902 to \$15,835</td> <td>\$3,872 to \$11,151</td> <td>\$4,875 to \$15,750</td> <td>\$3,850 to \$11,100</td> <td>\$3,300 to \$9,100</td> <td>\$2,640 to \$6,700</td> </tr> </tbody> </table>	Cat./ Sub-cat.	Cat/Sub-Cat Description	No. of Entities	Fee method	Scenario 1		Scenario 2		Scenario 3		<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>	05-01	0 to <1 MGD	8	Equation	\$855 + \$4,022 * Flow (MGD)	\$704 + \$3,018 * Flow (MGD)	\$850 + \$4,000 * Flow (MGD)	\$700 + \$3,000 * Flow (MGD)	\$550 + \$2,200 * Flow (MGD)	\$450 + \$1,900 * Flow (MGD)	Range	\$855 to \$4,837	\$704 to \$3,692	\$850 to \$4,810	\$700 to \$3,670	\$550 to \$2,728	\$450 to \$2,331	05-02	>= 1 MGD	16	Equation	\$4,525 + \$377 * Flow (MGD)	\$3,621 + \$251 * Flow (MGD)	\$4,500 + \$375 * Flow (MGD)	\$3,600 + \$250 * Flow (MGD)	\$3,100 + \$200 * Flow (MGD)	\$2,500 + \$140 * Flow (MGD)	Range	\$4,902 to \$15,835	\$3,872 to \$11,151	\$4,875 to \$15,750	\$3,850 to \$11,100	\$3,300 to \$9,100	\$2,640 to \$6,700
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Scenario 3:	2	2																																																			
Reclaimed Water Comments:																																																					

Generally support program funding through ala carte structure, where fees are largely based upon the level of individual

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service provided to treaters. The exceptions would be regulatory development/triennial review time spent (agree with proposed 300 hours/year) which should be split across treaters based upon actual average MGD reclaimed water flow rather than treatment capacity as generally, larger treaters may get more benefit from expanded uses. Many plants have rated capacities way higher than could reasonably be attained in a short/moderate timeframe (next 10 years) - therefore basing fees on capacity doesn't seem equitable. Recommend Division truly evaluate (from a time perspective) what compliance activities and associated efforts would vary from treater to treater and whether a variable average MGD produced affects this equation significantly.

SITE APPLICATIONS AND DESIGN REVIEW

Scenario 1:	1		Scenario 1	Scenario 2	Scenario 3
Scenario 2:	5		35.1%	34.5%	9%
Scenario 3:	1				

Site Application & Design Review Comments:

PRELIMINARY EFFLUENT LIMITATIONS (PELs)

Low complexity service:	3		Service Type	Application Fee	Anticipated Actions
Medium/low complexity service:	3		Low complexity	\$600 (application)	Groundwater PELs
Medium complexity service:	3		Medium/low complexity	\$1,100 (application)	Groundwater PELs with analysis of ambient groundwater levels.
High to very high complexity service:	4		Medium complexity	\$3,800 (application)	Surface water PELs, DWWTWs minors.
			High to very high complexity	\$3,800 with application, additional - refer to hourly rate below.	Surface water PELs, DWWTW majors. Surface water PELs, water treatment plant reverse osmosis discharge.

PELs Comments

If fees are due at time of application, how would a high complexity applicant know how many hours would be needed by staff to complete the PELs?

DISCHARGE PERMIT APPLICATIONS, APPLICATION SUPPLEMENTS AND PERMIT MODIFICATIONS

Applications and supplementals: fee is 50 percent of the annual fee. 3

Permit modifications: fee of 25 percent for minor amendments and 50 percent for major amendments. 3

Discharge Permit Comments:

Unclear whether this also includes permit renewal applications? Currently, for DWWTW renewal applications, there's no up-front fee. If a fee needs to be paid for renewals, there needs to be a timeline for Division response or reissuance.

A LA CARTE

Compliance assistance:	3		Service Type	Application Fee	Example Actions
Administrative Action:	3		Compliance assistance	no fee	<ul style="list-style-type: none"> Compliance assistance inspection or audit, upon request
Low complexity service:	3		Administrative action	\$80	<ul style="list-style-type: none"> Permit transfer NOX Minor permit modification (removal of an out fall)
Medium/low complexity service:	3		Low complexity service	\$600	<ul style="list-style-type: none"> Regulatory exemption, confirmation of lagoon seepage rate
Medium complexity service:	3		Medium/low complexity service	\$1,100	<ul style="list-style-type: none"> Not anticipated at this time for PPU.
High to very high complexity service:	3		Medium complexity service	\$3,800	<ul style="list-style-type: none"> Not anticipated at this time for PPU.
A la carte Comments:			High to very high complexity service	\$3,800 submitted with application, additional - see hourly rates above	<ul style="list-style-type: none"> Not anticipated at this time for PPU.

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WORK GROUP RECOMMENDATIONS

1. Add accountability metrics to break information in to another level of detail by program area (e.g. biosolids, reuse, and pretreatment) to the WQCC annual report. 5
2. Ensure annual fees cover services including FAQs, application guidance, sample applications, permit requirement summaries/training (post-issuance consultation included), common failures/issues document and compliance forum at existing levels. 3
3. Include pre-issuance and/or pre-notice consultation in the annual fee packaged services. 4
4. Set a statutory fee cap for reclaimed water. Actual fees for program decided during triennial review. 3
5. For reclaimed water, fees are scaled on flow however an additional fee should be applied on a per user basis based on work load of compliance activities. 4
6. For reclaimed water, new services fees for this subsector are set to provide funding for approximately 300 hours. The recommendation is to increase from 300 to 600 for other reclaimed water services such as low risk discharge policy development or more streamlined approval of new uses. Add additional resources to the division to increase timeliness of NOAs. 3
7. Consider active replenishment of fund balance as a viable scenario (Scenario 5).

Recommendation Comments

POLICY CONSIDERATIONS FOR OVERALL SUCCESS

In developing concepts for a fee structure, stakeholders identified the need to strike a balance between certainty and flexibility. A more certain structure, for example, one with dollars in statute has trades offs in the ability to evolve services and spend additional time on complex issues. A more flexible system can result in a higher rate of change in fee amounts. Accountability was also an important concept expressed by stakeholders.

1. Certainty: 2
 2. Flexibility: 3
 3. Accountability: 5
 4. Rationale for setting fees: 4
 5. Subsidies for permit holders: 1
 6. What do you think is an appropriate frequency to review fees and fee structure? (Select one): 5 Years
- If selected Other, please explain:
7. What do you think is the best manner to adjust for inflation?:

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Statute v. Commission

There are a number of considerations when assessing the roles of the Water Quality Control Commission and statutory authority. A different solution may be appropriate for each sector.

- 1. Fees established by the Water Quality Control Commission. 2
- 2. Fees established in statute with a statutory cap and periodic adjustment made as necessary by the Water Quality Control Commission. 5
- 3. A la carte services and fees established and managed by the Water Quality Control Commission. 2
- 4. A la carte services and fees established in statute. 2
- 5. Fee formulas in statute. 2
- 6. Fees in statute with an inflation clause. 1
- 7. Fees in statute without an adjustment for inflation (current model). 1

Fee Comments

General Fund

There are different schools of thought for how general fund should be distributed in the Clean Water Program that range from no general fund to completely funded with general fund dollars.

- 1. The division has the discretion to spend as needed. 1
- 2. The only permit holders to receive general fund are those which involve governmental entities such as public utilities, local governments, or state agencies (e.g. Colorado Department of Transportation). 4
- 3. All permit holders receive some general funds but it should largely go to governmental entities. 3
- 4. All permit holders receive equal distribution based on a percentage. 4
- 5. All permit holders receive a percentage based on the department's discretion and other to be determined factors. 2
- 6. No permit holder general fund as it should be a completely cash funded program. 1
- 7. Only small public and private entities receive general fund. 1
- 8. Allocate general fund to program areas or permit activities with small numbers of permits to keep fees reasonable. 1

General Fund Comments

Final Ratings

- 1. Small workgroup meetings were helpful in increasing my understanding of sector specific fees and having dialogue about how to improve the fee structure for the specific group. 4
- 2. Large group meetings were helpful in understanding the department's position and providing an avenue for large group discussion on cross cutting topics of interest. 4
- 3. Meeting materials increased my overall level of understanding about the history of Clean Water Program fees and their history, overall department and division funding and how the division manages clean water program permitted activities. 5
- 4. Facilitation was effective and objective. 5
- 5. This process was successful at creating a trusting, open atmosphere to discuss issues of interest. 4
- 6. This process was helpful in building professional relationships with peers that I did not have before this process. 3

Final Comments

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Mike Scharp

Representative for: Parker Ag Services, LLC (Group)

Phone: 719-282-3574

Email: scharpm@aol.com

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Did you attend the PPU workgroup meetings?: Yes

DOMESTIC WASTEWATER TREATMENT WORKS (DWWTWS)

DWWTW Scenario 1:

DWWTW Scenario 2:

DWWTW Scenario 3:

DWWTW Comments:

Cat./ Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1		Scenario 2		Scenario 3	
01-01	0 to <1 MGD	439	Range	Equation: \$804 + \$4525 * Flow (MGD)	\$804 to \$5,284	Equation: \$800 + \$4500 * Flow (MGD)	\$800 to \$5,255	Equation: \$670 + \$3500 * Flow (MGD)	\$670 to \$4,135
01-02	>= 1 MGD to 2.5 MGD	41	Set amount	\$8,228		\$8,191		\$6,638	
01-03	>= 2.5 MGD to 10 MGD	39	Set amount	\$15,415		\$15,346		\$12,437	
01-04	>= 10 MGD to 50 MGD	10	Set amount	\$26,723		\$26,604		\$21,560	
01-05	>= 50 MGD to 100 MGD	2	Set amount	\$30,830		\$30,693		\$24,874	
01-06	>= 100 MGD	1	Set amount	\$33,910		\$33,760		\$27,359	

WATER TREATMENT PLANTS

Scenario1:

Scenario2:

Scenario3:

Water Treatment Plant Comments:

Cat./Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1	Scenario 2	Scenario 3
02-01	Individual permits	10	Set amount	\$6,313	\$6,246	\$3,400
02-02	General permits	94	Set amount	\$1,006	\$1,000	\$750

PRETREATMENT

Pretreatment Scenario 1:

Pretreatment Scenario 2:

Pretreatment Scenario 3:

Pretreatment Comments:

Cat./ Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1	Scenario 2	Scenario 3
04-01	Division approved POTW	2	Set amount added to permit annual fee	\$2,413	\$2,400	\$2,400
04-02	EPA approved and unapproved POTW <1 MGD	213	Set amount added to permit annual fee	\$151	\$150	\$130
04-03	EPA approved and unapproved POTW >= 1 MGD	94	Set amount added to permit annual fee	\$503	\$500	\$400
04-04	Division-authorized Significant Industrial User	10	Set amount	\$1,006	\$1,000	\$700

BIOSOLIDS

	With New Services	Without New Services
Scenario 1:	1	1
Scenario 2:	5	4
Scenario 3:	1	1

Biosolids Comments:

Cat./ Sub-cat.	Cat/Sub-Cat Description	No. of Entities	Fee method	Scenario 1		Scenario 2		Scenario 3	
				<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>
03-01	Beneficial reuse	92	Equation:	\$3.82 per dry ton	\$2.51 per dry ton	\$3.80 per dry ton	\$2.50 per dry ton	\$2.70 per dry ton	\$2.05 per dry ton
			Range	\$80 to \$90,057	\$80 to \$59,173	\$80 to \$89,585	\$80 to \$58,938	\$80 to \$63,653	\$80 to \$48,329
03-02	DWWTWs (generators) <30 dry tons	441	Set amount	\$121	\$35	\$120	\$35	\$78	\$35
03-03	DWWTWs (generators) >= 30 dry tons	92	Set amount	\$804	\$35	\$800	\$35	\$420	\$35

I strongly support the fact that the fees should be increased and increase to the point that if delegation is decided upon then there is flexibility to allow this. It does not make sense to increase the fees and not allow for this since many in the industry do not understand the changed that are coming from the USEPA. Also a per generator fee is good to allow small generators to contribute to the effort that they may not use much but allows for the program to exist when they need such as lagoon cleaning.

Mike Scharp

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RECLAIMED WATER

With New Services Without New Services

Scenario 1:

Scenario 2:

Scenario 3:

Reclaimed Water Comments:

Cat./ Sub-cat.	Cat/Sub-Cat Description	No. of Entities	Fee method	Scenario 1		Scenario 2		Scenario 3	
				<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>
05-01	0 to <1 MGD	8	Equation	\$855 + \$4,022 * Flow (MGD)	\$704 + \$3,018 * Flow (MGD)	\$850 + \$4,000 * Flow (MGD)	\$700 + \$3,000 * Flow (MGD)	\$550 + \$2,200 * Flow (MGD)	\$450 + \$1,900 * Flow (MGD)
			Range	\$855 to \$4,837	\$704 to \$3,692	\$810 to \$4,810	\$700 to \$3,670	\$550 to \$2,728	\$450 to \$2,331
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SITE APPLICATIONS AND DESIGN REVIEW

Scenario 1:

Scenario 2:

Scenario 3:

Site Application & Design Review Comments:

	Scenario 1	Scenario 2	Scenario 3
Site applications and design review: percent change	35.1%	34.5%	9%

PRELIMINARY EFFLUENT LIMITATIONS (PELS)

Low complexity service:

Medium/low complexity service:

Medium complexity service:

High to very high complexity service:

PELs Comments

Service Type	Application Fee	Anticipated Actions
Low complexity	\$600 (application)	Groundwater PELs
Medium/low complexity	\$1,100 (application)	Groundwater PELs with analysis of ambient groundwater levels.
Medium complexity	\$3,800 (application)	Surface water PELs, DWWTWs minors.
High to very high complexity	\$3,800 with application, additional - refer to hourly rate below.	Surface water PELs, DWWTW majors. Surface water PELs, water treatment plant reverse osmosis discharge.

DISCHARGE PERMIT APPLICATIONS, APPLICATION SUPPLEMENTS AND PERMIT MODIFICATIONS

Applications and supplementals: fee is 50 percent of the annual fee.

Permit modifications: fee of 25 percent for minor amendments and 50 percent for major amendments.

Discharge Permit Comments:

A LA CARTE

Compliance assistance:

Administrative Action:

Low complexity service:

Medium/low complexity service:

Medium complexity service:

High to very high complexity service:

A la carte Comments:

Service Type	Application Fee	Example Actions
Compliance assistance	no fee	• Compliance assistance inspection or audit, upon request
Administrative action	\$80	• Permit transfer • NOX • Minor permit modification (removal of an outfall)
Low complexity service	\$600	• Regulatory exemption, confirmation of lagoon seepage rate
Medium/low complexity service	\$1,100	• Not anticipated at this time for PPU.
Medium complexity service	\$3,800	• Not anticipated at this time for PPU.
High to very high complexity service	\$3,800 submitted with application, additional - see hourly rates above	• Not anticipated at this time for PPU.

Mike Scharp

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7. Consider active replenishment of fund balance as a viable scenario (Scenario 5).

Recommendation Comments

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In developing concepts for a fee structure, stakeholders identified the need to strike a balance between certainty and flexibility. A more certain structure, for example, one with dollars in statute has trades offs in the ability to evolve services and spend additional time on complex issues. A more flexible system can result in a higher rate of change in fee amounts. Accountability was also an important concept expressed by stakeholders.

1. Certainty:

2. Flexibility:

3. Accountability:

4. Rationale for setting fees:

5. Subsidies for permit holders:

6. What do you think is an appropriate frequency to review fees and fee structure? (Select one):

Other

If selected Other, please explain:

7. What do you think is the best manner to adjust for inflation?:

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2. Fees established in statute with a statutory cap and periodic adjustment made as necessary by the Water Quality Control Commission.
3. A la carte services and fees established and managed by the Water Quality Control Commission.
4. A la carte services and fees established in statute.
5. Fee formulas in statute.
6. Fees in statute with an inflation clause.
7. Fees in statute without an adjustment for inflation (current model).

Fee Comments

General Fund

There are different schools of thought for how general fund should be distributed in the Clean Water Program that range from no general fund to completely funded with general fund dollars.

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General Fund Comments

Final Ratings

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4. Facilitation was effective and objective.
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6. This process was helpful in building professional relationships with peers that I did not have before this process.

Final Comments

Mike Scharp

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Did you attend the PPU workgroup meetings?: Yes

DOMESTIC WASTEWATER TREATMENT WORKS (DWWTWS)

DWWTW Scenario 1: 2
 DWWTW Scenario 2: 2
 DWWTW Scenario 3: 4

Cat./ Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1		Scenario 2		Scenario 3	
01-01	0 to <1 MGD	439	Range	Equation: \$804 + \$4525 * Flow (MGD)	\$804 to \$5,284	Equation: \$800 + \$4500 * Flow (MGD)	\$800 to \$5,255	Equation: \$670 + \$3500 * Flow (MGD)	\$670 to \$4,135
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01-03	>= 2.5 MGD to 10 MGD	39	Set amount	\$15,415		\$15,346		\$12,437	
01-04	>= 10 MGD to 50 MGD	10	Set amount	\$26,723		\$26,604		\$21,560	
01-05	>= 50 MGD to 100 MGD	2	Set amount	\$30,830		\$30,693		\$24,874	
01-06	>= 100 MGD	1	Set amount	\$33,910		\$33,760		\$27,359	

DWWTW Comments:

Balancing the budget between general and cash funds makes the most sense, since none of the three proposed scenarios include any new services.

WATER TREATMENT PLANTS

Scenario1: 3
 Scenario2: 3
 Scenario3: 4

Cat./Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1	Scenario 2	Scenario 3
02-01	Individual permits	10	Set amount	\$6,313	\$6,246	\$3,400
02-02	General permits	94	Set amount	\$1,006	\$1,000	\$750

Water Treatment Plant Comments:

PRETREATMENT

Pretreatment Scenario 1: 3
 Pretreatment Scenario 2: 3
 Pretreatment Scenario 3: 3

Cat./ Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1	Scenario 2	Scenario 3
04-01	Division approved POTW	2	Set amount added to permit annual fee	\$2,413	\$2,400	\$2,400
04-02	EPA approved and unapproved POTW <1 MGD	213	Set amount added to permit annual fee	\$151	\$150	\$130
04-03	EPA approved and unapproved POTW >= 1 MGD	94	Set amount added to permit annual fee	\$503	\$500	\$400
04-04	Division-authorized Significant Industrial User	10	Set amount	\$1,006	\$1,000	\$700

Pretreatment Comments:

BIOSOLIDS

	With New Services	Without New Services
Scenario 1:	3	3
Scenario 2:	3	3
Scenario 3:	3	3

Cat./ Sub-cat.	Cat/Sub-Cat Description	No. of Entities	Fee method	Scenario 1		Scenario 2		Scenario 3	
				incl. new services	no new services	incl. new services	no new services	incl. new services	no new services
03-01	Beneficial reuse	92	Equation:	\$3.82 per dry ton	\$2.51 per dry ton	\$3.80 per dry ton	\$2.50 per dry ton	\$2.70 per dry ton	\$2.05 per dry ton
			Range	\$80 to \$90,057	\$80 to \$59,173	\$80 to \$89,585	\$80 to \$58,938	\$80 to \$63,653	\$80 to \$48,329
03-02	DWWTWS (generators) <30 dry tons	441	Set amount	\$121	\$35	\$120	\$35	\$78	\$35
03-03	DWWTWS (generators) >= 30 dry tons	92	Set amount	\$804	\$35	\$800	\$35	\$420	\$35

Biosolids Comments:

Bobby Anastasov

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RECLAIMED WATER

	With New Services	Without New Services
Scenario 1:	2	3
Scenario 2:	2	3
Scenario 3:	2	4

Cat./ Sub-cat.	Cat/Sub-Cat Description	No. of Entities	Fee method	Scenario 1		Scenario 2		Scenario 3	
				<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>
05-01	0 to <1 MGD	8	Equation	\$855 + \$4,022 * Flow (MGD)	\$704 + \$3,018 * Flow (MGD)	\$850 + \$4,000 * Flow (MGD)	\$700 + \$3,000 * Flow (MGD)	\$550 + \$2,200 * Flow (MGD)	\$450 + \$1,900 * Flow (MGD)
			Range	\$855 to \$4,837	\$704 to \$3,692	\$850 to \$4,810	\$700 to \$3,670	\$550 to \$2,728	\$450 to \$2,331
05-02	>= 1 MGD	16	Equation	\$4,525 + \$377 * Flow (MGD)	\$3,621 + \$251 * Flow (MGD)	\$4,500 + \$375 * Flow (MGD)	\$3,600 + \$250 * Flow (MGD)	\$3,100 + \$200 * Flow (MGD)	\$2,500 + \$140 * Flow (MGD)
			Range	\$4,902 to \$15,835	\$3,872 to \$11,151	\$4,875 to \$15,750	\$3,850 to \$11,100	\$3,300 to \$9,100	\$2,640 to \$6,700

Reclaimed Water Comments:

"New Services" with "New Uses" must be clearly defined. All fee structures associated with the Reuse Program should remain within State Statute and a dedicate FTE should be assigned to the program.

SITE APPLICATIONS AND DESIGN REVIEW

Scenario 1:	2
Scenario 2:	2
Scenario 3:	4

	Scenario 1	Scenario 2	Scenario 3
Site applications and design review: percent change	35.1%	34.5%	9%

Site Application & Design Review Comments:

A 34.5%-35.1% increase seems unnecessary since the Division's latest fee proposal states, "the overall fee structure for site applications and design review will not change".

PRELIMINARY EFFLUENT LIMITATIONS (PELs)

Low complexity service:	4
Medium/low complexity service:	4
Medium complexity service:	4
High to very high complexity service:	4

Service Type	Application Fee	Anticipated Actions
Low complexity	\$600 (application)	Groundwater PELs
Medium/low complexity	\$1,100 (application)	Groundwater PELs with analysis of ambient groundwater levels.
Medium complexity	\$3,800 (application)	Surface water PELs, DWWTWs minors.
High to very high complexity	\$3,800 with application, additional - refer to hourly rate below.	Surface water PELs, DWWTW majors. Surface water PELs, water treatment plant reverse osmosis discharge.

PELs Comments

The differences between low and medium complexity need to be more clearly defined.

DISCHARGE PERMIT APPLICATIONS, APPLICATION SUPPLEMENTS AND PERMIT MODIFICATIONS

Applications and supplementals: fee is 50 percent of the annual fee. 2

Permit modifications: fee of 25 percent for minor amendments and 50 percent for major amendments. 2

Discharge Permit Comments:

Major vs. Minor amendments should be well defined for permit modifications.

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A LA CARTE

- Compliance assistance: 3
- Administrative Action: 3
- Low complexity service: 3
- Medium/low complexity service: 3
- Medium complexity service: 3
- High to very high complexity service: 3
- A la carte Comments:

Service Type	Application Fee	Example Actions
Compliance assistance	no fee	<ul style="list-style-type: none"> • Compliance assistance inspection or audit, upon request
Administrative action	\$80	<ul style="list-style-type: none"> • Permit transfer • NOX • Minor permit modification (removal of an outfall)
Low complexity service	\$600	<ul style="list-style-type: none"> • Regulatory exemption, confirmation of lagoon seepage rate
Medium/low complexity service	\$1,100	<ul style="list-style-type: none"> • Not anticipated at this time for PPU.
Medium complexity service	\$3,800	<ul style="list-style-type: none"> • Not anticipated at this time for PPU.
High to very high complexity service	\$3,800 submitted with application, additional - see hourly rates above	<ul style="list-style-type: none"> • Not anticipated at this time for PPU.

WORK GROUP RECOMMENDATIONS

- 1. Add accountability metrics to break information in to another level of detail by program area (e.g. biosolids, reuse, and pretreatment) to the WQCC annual report. 5
- 2. Ensure annual fees cover services including FAQs, application guidance, sample applications, permit requirement summaries/training (post-issuance consultation included), common failures/issues document and compliance forum at existing levels. 5
- 3. Include pre-issuance and/or pre-notice consultation in the annual fee packaged services. 5
- 4. Set a statutory fee cap for reclaimed water. Actual fees for program decided during triennial review. 5
- 5. For reclaimed water, fees are scaled on flow however an additional fee should be applied on a per user basis based on work load of compliance activities. 3
- 6. For reclaimed water, new services fees for this subsector are set to provide funding for approximately 300 hours. The recommendation is to increase from 300 to 600 for other reclaimed water services such as low risk discharge policy development or more streamlined approval of new uses. Add additional resources to the division to increase timeliness of NOAs. 4
- 7. Consider active replenishment of fund balance as a viable scenario (Scenario 5). 2

Recommendation Comments

POLICY CONSIDERATIONS FOR OVERALL SUCCESS

In developing concepts for a fee structure, stakeholders identified the need to strike a balance between certainty and flexibility. A more certain structure, for example, one with dollars in statute has trades offs in the ability to evolve services and spend additional time on complex issues. A more flexible system can result in a higher rate of change in fee amounts. Accountability was also an important concept expressed by stakeholders.

- 1. Certainty: 1
- 2. Flexibility: 3
- 3. Accountability: 2
- 4. Rationale for setting fees: 4
- 5. Subsidies for permit holders: 5
- 6. What do you think is an appropriate frequency to review fees and fee structure? (Select one): 3 Years
- If selected Other, please explain:
- 7. What do you think is the best manner to adjust for inflation?:

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Statute v. Commission

There are a number of considerations when assessing the roles of the Water Quality Control Commission and statutory authority. A different solution may be appropriate for each sector.

1. Fees established by the Water Quality Control Commission. 1
2. Fees established in statute with a statutory cap and periodic adjustment made as necessary by the Water Quality Control Commission. 1
3. A la carte services and fees established and managed by the Water Quality Control Commission. 1
4. A la carte services and fees established in statute. 3
5. Fee formulas in statute. 3
6. Fees in statute with an inflation clause. 4
7. Fees in statute without an adjustment for inflation (current model). 4

Fee Comments

Strongly support keeping fees in State Statute rather than set by the WQCC.

General Fund

There are different schools of thought for how general fund should be distributed in the Clean Water Program that range from no general fund to completely funded with general fund dollars.

1. The division has the discretion to spend as needed. 4
2. The only permit holders to receive general fund are those which involve governmental entities such as public utilities, local governments, or state agencies (e.g. Colorado Department of Transportation). 2
3. All permit holders receive some general funds but it should largely go to governmental entities. 2
4. All permit holders receive equal distribution based on a percentage. 2
5. All permit holders receive a percentage based on the department's discretion and other to be determined factors. 3
6. No permit holder general fund as it should be a completely cash funded program. 1
7. Only small public and private entities receive general fund. 2
8. Allocate general fund to program areas or permit activities with small numbers of permittees to keep fees reasonable. 2

General Fund Comments

General fund money should be available to spend at the Division's discretion to cover unfunded program areas, buffer the fluctuations in permit numbers, or temporary, high-resource projects. It should not be used to grow existing Division programs or staffing once fees adequately cover these activities.

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Final Ratings

- 1. Small workgroup meetings were helpful in increasing my understanding of sector specific fees and having dialogue about how to improve the fee structure for the specific group. 4
- 2. Large group meetings were helpful in understanding the department's position and providing an avenue for large group discussion on cross cutting topics of interest. 3
- 3. Meeting materials increased my overall level of understanding about the history of CleanWater Program fees and their history, overall department and division funding and how the division manages clean water program permitted activities. 5
- 4. Facilitation was effective and objective. 2
- 5. This process was successful at creating a trusting, open atmosphere to discuss issues of interest. 3
- 6. This process was helpful in building professional relationships with peers that I did not have before this process. 3

Final Comments

There was some good conversation/progress made during the small group meetings however, the same cannot be said for the larger group meetings. The large group meetings seemed to simply give an overview of the same general concepts brought forward in the small group meetings. Furthermore, due to the tight meeting schedule fully reviewing and comprehending the material prior to the meetings did provided to be somewhat challenging.

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Did you attend the PPU workgroup meetings?: Yes

DOMESTIC WASTEWATER TREATMENT WORKS (DWWTWS)

DWWTW Scenario 1: 3
 DWWTW Scenario 2: 5
 DWWTW Scenario 3: 2

Cat./Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1		Scenario 2		Scenario 3	
01-01	0 to <1 MGD	439	Range	Equation: \$804 + \$4525 * Flow (MGD)	\$804 to \$5,284	Equation: \$800 + \$4500 * Flow (MGD)	\$800 to \$5,255	Equation: \$670 + \$3500 * Flow (MGD)	\$670 to \$4,135
01-02	>= 1 MGD to 2.5 MGD	41	Set amount	\$8,228		\$8,191		\$6,638	
01-03	>= 2.5 MGD to 10 MGD	39	Set amount	\$15,415		\$15,346		\$12,437	
01-04	>= 10 MGD to 50 MGD	10	Set amount	\$26,723		\$26,604		\$21,560	
01-05	>= 50 MGD to 100 MGD	2	Set amount	\$30,830		\$30,693		\$24,874	
01-06	>= 100 MGD	1	Set amount	\$33,910		\$33,760		\$27,359	

DWWTW Comments:

It seems Scenario 2 provides the opportunity for more equity of fees required of dischargers. The realistic implementation of Scenario 3 appears to be subject to many influences outside the Clean Water Program, removing much of the control of General Fund resources from the Division and the dischargers. It does, however, demands that other beneficiaries of the State's "clean water," i.e. agriculture, recreation, sportsmen, tourism, pay a share of the cost of "clean water."

WATER TREATMENT PLANTS

Scenario1: 3
 Scenario2: 5
 Scenario3: 1

Cat./Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1	Scenario 2	Scenario 3
02-01	Individual permits	10	Set amount	\$6,313	\$6,246	\$3,400
02-02	General permits	94	Set amount	\$1,006	\$1,000	\$750

Water Treatment Plant Comments:

PRETREATMENT

Pretreatment Scenario 1: 3
 Pretreatment Scenario 2: 5
 Pretreatment Scenario 3: 3

Cat./Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1	Scenario 2	Scenario 3
04-01	Division approved POTW	2	Set amount added to permit annual fee	\$2,413	\$2,400	\$2,400
04-02	EPA approved and unapproved POTW <1 MGD	213	Set amount added to permit annual fee	\$151	\$150	\$130
04-03	EPA approved and unapproved POTW >= 1 MGD	94	Set amount added to permit annual fee	\$503	\$500	\$400
04-04	Division-authorized Significant Industrial User	10	Set amount	\$1,006	\$1,000	\$700

Pretreatment Comments:

Category 04-04 proposed fees don't "feel right" in comparison to others. They seem too low in relation to my perceived effort to permit, inspect, monitor and maintain database.

BIOSOLIDS

	With New Services	Without New Services
Scenario 1:	3	3
Scenario 2:	4	5
Scenario 3:	1	1

Cat./Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee method	Scenario 1		Scenario 2		Scenario 3	
				incl. new services	no new services	incl. new services	no new services	incl. new services	no new services
03-01	Beneficial reuse	92	Equation:	\$3.82 per dry ton	\$2.51 per dry ton	\$3.80 per dry ton	\$2.50 per dry ton	\$2.70 per dry ton	\$2.05 per dry ton
			Range	\$80 to \$90,057	\$80 to \$59,173	\$80 to \$89,585	\$80 to \$58,938	\$80 to \$63,653	\$80 to \$48,329
03-02	DWWTWs (generators) <30 dry tons	441	Set amount	\$121	\$35	\$120	\$35	\$78	\$35
03-03	DWWTWs (generators) >= 30 dry tons	92	Set amount	\$804	\$35	\$800	\$35	\$420	\$35

Biosolids Comments:

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RECLAIMED WATER

	With New Services	Without New Services
Scenario 1:	3	3
Scenario 2:	4	4
Scenario 3:	2	2

Cat./ Sub-cat.	Cat/Sub-Cat Description	No. of Entities	Fee method	Scenario 1		Scenario 2		Scenario 3	
				<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>
05-01	0 to <1 MGD	8	Equation	\$855 + \$4,022 * Flow (MGD)	\$704 + \$3,018 * Flow (MGD)	\$850 + \$4,000 * Flow (MGD)	\$700 + \$3,000 * Flow (MGD)	\$550 + \$2,200 * Flow (MGD)	\$450 + \$1,900 * Flow (MGD)
			Range	\$855 to \$4,837	\$704 to \$3,692	\$850 to \$4,810	\$700 to \$3,670	\$550 to \$2,728	\$450 to \$2,331
05-02	>= 1 MGD	16	Equation	\$4,525 + \$377 * Flow (MGD)	\$3,621 + \$251 * Flow (MGD)	\$4,500 + \$375 * Flow (MGD)	\$3,600 + \$250 * Flow (MGD)	\$3,100 + \$200 * Flow (MGD)	\$2,500 + \$140 * Flow (MGD)
			Range	\$4,902 to \$15,835	\$3,872 to \$11,151	\$4,875 to \$15,750	\$3,850 to \$11,100	\$3,300 to \$9,100	\$2,640 to \$6,700

Reclaimed Water Comments:

Be SURE to clarify that the fee structure is applied to the reclaimed water production system design capacity identified in the NOA; not the design capacity of the POTW from which the reclaimed water originates.

SITE APPLICATIONS AND DESIGN REVIEW

Scenario 1:	2
Scenario 2:	2
Scenario 3:	4

	Scenario 1	Scenario 2	Scenario 3
Site applications and design review: percent change	35.1%	34.5%	9%

Site Application & Design Review Comments:

Although we prefer the "pay your own way" approach of Scenario 2, the current fees for site applications and design reviews do not appear to be commensurate with the perceived effort of Division staff; they do not warrant a 35% increase unless there is more accountability of the real time spent in processing the applications for approval. The current fees, when reduced to an hourly rate, would seem to not warrant the increases proposed in Scenario 1 and 2; they seem to be more than sufficient at present. Thus, the "across the board" increase of these proposals for this part of the program don't appear reasonable.

PRELIMINARY EFFLUENT LIMITATIONS (PELs)

Low complexity service:	5
Medium/low complexity service:	5
Medium complexity service:	5
High to very high complexity service:	5

Service Type	Application Fee	Anticipated Actions
Low complexity	\$600 (application)	Groundwater PELs
Medium/low complexity	\$1,100 (application)	Groundwater PELs with analysis of ambient groundwater levels.
Medium complexity	\$3,800 (application)	Surface water PELs, DWWTWs minors.
High to very high complexity	\$3,800 with application, additional - refer to hourly rate below.	Surface water PELs, DWWTW majors. Surface water PELs, water treatment plant reverse osmosis discharge.

PELs Comments

The proposals remain a bargain. Having done independent PEL analyses outside of the Division's efforts, these fees are more than reasonable. However, for the High + complexity; be sure to express/document the maximum fee which will be billed hourly for any given project. The controversies regarding the fees due on an hourly basis will almost always result from "unfulfilled expectations," i.e. "I didn't know it would be THAT high!!"

DISCHARGE PERMIT APPLICATIONS, APPLICATION SUPPLEMENTS AND PERMIT MODIFICATIONS

Applications and supplementals: fee is 50 percent of the annual fee. 2

Permit modifications: fee of 25 percent for minor amendments and 50 percent for major amendments. 2

Discharge Permit Comments:

These approaches seem to be too arbitrary and most likely not representative of the effort and direct cost of the work to the Division, at least lacking in transparency and accountability. I think we must have all been getting really tired of dealing with the issues when we got to this subject. A fixed application fee to cover the determination of a complete application and database entry PLUS an equation based fee related to permitted discharge rate; one "equation" for

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individual permits and one "equation" for General Permits, would be more suitable.

A LA CARTE

- Compliance assistance: 5
- Administrative Action: 5
- Low complexity service: 2
- Medium/low complexity service: 1
- Medium complexity service: 2
- High to very high complexity service: 5

Service Type	Application Fee	Example Actions
Compliance assistance	no fee	• Compliance assistance inspection or audit, upon request
Administrative action	\$80	• Permit transfer • NOX • Minor permit modification (removal of an outfall)
Low complexity service	\$600	• Regulatory exemption, confirmation of lagoon seepage rate
Medium/low complexity service	\$1,100	• Not anticipated at this time for PPU.
Medium complexity service	\$3,800	• Not anticipated at this time for PPU.
High to very high complexity service	\$3,800 submitted with application, additional - see hourly rates above	• Not anticipated at this time for PPU.

A la carte Comments:

Prepare a comprehensive "shopping list" of Administrative Action activities to which the minuscule fee will apply. I perceive the "Low Complexity Service" will be a catch-all for Division review and logging of all submittals required by permit compliance schedule activities. In most cases, if that effort takes more than 4 hours, someone doesn't know what they are looking at or should have kicked it back to the discharger saying it is insufficient. Most compliance schedule submittals should be able to be received, reviewed and logged in less than the 8 hours the \$600 fee covers. So, delete the "Medium/Low Complexity service" category, change the fee for the "Medium complexity service" to \$1,100 minimum plus hourly to \$3,800 total and remove the "qualifier" under the "Example Actions" as we are certain this category will be used. As noted above, prepare a "shopping list" of activities, amended monthly if necessary as Division experience dictates, to be transparent and accountable in which Service Type any particular activity will be classified.

WORK GROUP RECOMMENDATIONS

- 1. Add accountability metrics to break information in to another level of detail by program area (e.g. biosolids, reuse, and pretreatment) to the WQCC annual report. 4
- 2. Ensure annual fees cover services including FAQs, application guidance, sample applications, permit requirement summaries/training (post-issuance consultation included), common failures/issues document and compliance forum at existing levels. 5
- 3. Include pre-issuance and/or pre-notice consultation in the annual fee packaged services. 5
- 4. Set a statutory fee cap for reclaimed water. Actual fees for program decided during triennial review. 2
- 5. For reclaimed water, fees are scaled on flow however an additional fee should be applied on a per user basis based on work load of compliance activities. 4
- 6. For reclaimed water, new services fees for this subsector are set to provide funding for approximately 300 hours. The recommendation is to increase from 300 to 600 for other reclaimed water services such as low risk discharge policy development or more streamlined approval of new uses. Add additional resources to the division to increase timeliness of NOAs. 3
- 7. Consider active replenishment of fund balance as a viable scenario (Scenario 5). 5

Recommendation Comments

Recommendation No. 1 is a good idea, but is must be well balanced with the added overhead cost of this record keeping and reporting effort.

Recommendation No. 4 - Let's not put this part of the fee structure in statute.

Recommendation No. 6 - We haven't seen any serious issues with timeliness of NOAs. Adding another 300 hours per year for support of the reclaimed water programs would appear to be a reasonable investment, assuming the permittees can

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effectively pass that added cost on to the beneficiaries of the use of reclaimed water.

POLICY CONSIDERATIONS FOR OVERALL SUCCESS

In developing concepts for a fee structure, stakeholders identified the need to strike a balance between certainty and flexibility. A more certain structure, for example, one with dollars in statute has trades offs in the ability to evolve services and spend additional time on complex issues. A more flexible system can result in a higher rate of change in fee amounts. Accountability was also an important concept expressed by stakeholders.

1. Certainty: 4
2. Flexibility: 2
3. Accountability: 1
4. Rationale for setting fees: 1
5. Subsidies for permit holders: 5
6. What do you think is an appropriate frequency to review fees and fee structure? (Select one): 5 Years

If selected Other, please explain:

7. What do you think is the best manner to adjust for inflation?: Use the ratio or % change in Division payroll costs, direct payroll plus direct labor overhead, for all Division staff under the Unit Manager level, over the period for which the fees will be adjusted, i.e. for those fees set in 2015 and examined in 2020 for adjustment, adjust for inflation by the ratio of payroll costs in 2020 to that in 2015.

Statute v. Commission

There are a number of considerations when assessing the roles of the Water Quality Control Commission and statutory authority. A different solution may be appropriate for each sector.

1. Fees established by the Water Quality Control Commission. 2
2. Fees established in statute with a statutory cap and periodic adjustment made as necessary by the Water Quality Control Commission. 1
3. A la carte services and fees established and managed by the Water Quality Control Commission. 2
4. A la carte services and fees established in statute. 1
5. Fee formulas in statute. 3
6. Fees in statute with an inflation clause. 1
7. Fees in statute without an adjustment for inflation (current model). 1

Fee Comments

Fees established by the WQCC may be satisfactory if we can be assured, somehow, that those who are not subject to the Clean Water Fee structure but are beneficiaries of clean water in the State, will still pay some share, fair or not, of the cost of clean water. That funding from those other beneficiaries can best come from the General Fund. The mechanism must be developed to best assure that legislative funding while at the same time making the dischargers' fee system as nimble, flexible and equitable as possible.

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General Fund

There are different schools of thought for how general fund should be distributed in the Clean Water Program that range from no general fund to completely funded with general fund dollars.

- 1. The division has the discretion to spend as needed. 5
- 2. The only permit holders to receive general fund are those which involve governmental entities such as public utilities, local governments, or state agencies (e.g. Colorado Department of Transportation). 2
- 3. All permit holders receive some general funds but it should largely go to governmental entities. 2
- 4. All permit holders receive equal distribution based on a percentage. 3
- 5. All permit holders receive a percentage based on the department's discretion and other to be determined factors. 3
- 6. No permit holder general fund as it should be a completely cash funded program. 1
- 7. Only small public and private entities receive general fund. 1
- 8. Allocate general fund to program areas or permit activities with small numbers of permittees to keep fees reasonable. 1

General Fund Comments

Please refer to comments at "Statute vs. Commission."

Final Ratings

- 1. Small workgroup meetings were helpful in increasing my understanding of sector specific fees and having dialogue about how to improve the fee structure for the specific group. 5
- 2. Large group meetings were helpful in understanding the department's position and providing an avenue for large group discussion on cross cutting topics of interest. 5
- 3. Meeting materials increased my overall level of understanding about the history of Clean Water Program fees and their history, overall department and division funding and how the division manages clean water program permitted activities. 5
- 4. Facilitation was effective and objective. 5
- 5. This process was successful at creating a trusting, open atmosphere to discuss issues of interest. 4
- 6. This process was helpful in building professional relationships with peers that I did not have before this process. 3

Final Comments

The sequence of canceled meetings of the PPU work groups was disappointing. I have no idea of what the reasons for the several canceled and rescheduled meetings were, but, it gave me the impression the work group coordinators, Division staff, legislative liaisons, or whoever was responsible for making the meetings happen, weren't ready, after they were scheduled in advance.

We recognize the benefits of strict time schedules in the conduct of the meetings. The efforts of the facilitators were outstanding to keep the meetings moving, trying to keep most people "out of the weeds," and force some conclusions. It is important however to provide time to let everyone reach "comfortable conclusions," ones they can feel comfortable that they have given suitable consideration and personal deliberation to get to the end. That didn't necessarily happen in the work group meetings due to the rush to get done on time. However, this comment and feedback opportunity helps a lot to address/solve that problem. Thanks !!!

Bobby Anastasov

Representative for: The City of Aurora Water Department (Individual)

Phone: 720-859-4418

Email: ranasat@auroragov.org

Each number (from 1-5) next to a question denotes that person's level of agreement with that question. One denoted that they strongly disagreed and choosing five denoted they strongly agreed with the question. If there was no number, the person did not answer that question.

Did you attend the PPU workgroup meetings?: Yes

DOMESTIC WASTEWATER TREATMENT WORKS (DWWTWS)

DWWTW Scenario 1: 2
 DWWTW Scenario 2: 2
 DWWTW Scenario 3: 4

Cat./ Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1		Scenario 2		Scenario 3	
01-01	0 to <1 MGD	439	Range	Equation: \$804 + \$4525 * Flow (MGD)	\$804 to \$5,284	Equation: \$800 + \$4500 * Flow (MGD)	\$800 to \$5,255	Equation: \$670 + \$3500 * Flow (MGD)	\$670 to \$4,135
01-02	>= 1 MGD to 2.5 MGD	41	Set amount	\$8,228		\$8,191		\$6,638	
01-03	>= 2.5 MGD to 10 MGD	39	Set amount	\$15,415		\$15,346		\$12,437	
01-04	>= 10 MGD to 50 MGD	10	Set amount	\$26,723		\$26,604		\$21,560	
01-05	>= 50 MGD to 100 MGD	2	Set amount	\$30,830		\$30,693		\$24,874	
01-06	>= 100 MGD	1	Set amount	\$33,910		\$33,760		\$27,359	

DWWTW Comments:

Balancing the budget between general and cash funds makes the most sense, since none of the three proposed scenarios include any new services.

WATER TREATMENT PLANTS

Scenario1: 3
 Scenario2: 3
 Scenario3: 4

Cat./Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1	Scenario 2	Scenario 3
02-01	Individual permits	10	Set amount	\$6,313	\$6,246	\$3,400
02-02	General permits	94	Set amount	\$1,006	\$1,000	\$750

Water Treatment Plant Comments:

PRETREATMENT

Pretreatment Scenario 1: 3
 Pretreatment Scenario 2: 3
 Pretreatment Scenario 3: 3

Cat./ Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1	Scenario 2	Scenario 3
04-01	Division approved POTW	2	Set amount added to permit annual fee	\$2,413	\$2,400	\$2,400
04-02	EPA approved and unapproved POTW <1 MGD	213	Set amount added to permit annual fee	\$151	\$150	\$130
04-03	EPA approved and unapproved POTW >= 1 MGD	94	Set amount added to permit annual fee	\$503	\$500	\$400
04-04	Division-authorized Significant Industrial User	10	Set amount	\$1,006	\$1,000	\$700

Pretreatment Comments:

BIOSOLIDS

	With New Services	Without New Services
Scenario 1:	3	3
Scenario 2:	3	3
Scenario 3:	3	3

Cat./ Sub-cat.	Cat/Sub-Cat Description	No. of Entities	Fee method	Scenario 1		Scenario 2		Scenario 3	
				incl. new services	no new services	incl. new services	no new services	incl. new services	no new services
03-01	Beneficial reuse	92	Equation:	\$3.82 per dry ton	\$2.51 per dry ton	\$3.80 per dry ton	\$2.50 per dry ton	\$2.70 per dry ton	\$2.05 per dry ton
			Range	\$80 to \$90,057	\$80 to \$59,173	\$80 to \$89,585	\$80 to \$58,938	\$80 to \$63,653	\$80 to \$48,329
03-02	DWWTWS (generators) <30 dry tons	441	Set amount	\$121	\$35	\$120	\$35	\$78	\$35
03-03	DWWTWS (generators) >= 30 dry tons	92	Set amount	\$804	\$35	\$800	\$35	\$420	\$35

Biosolids Comments:

Bobby Anastasov

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RECLAIMED WATER

	With New Services	Without New Services
Scenario 1:	2	3
Scenario 2:	2	3
Scenario 3:	2	4

Cat./ Sub-cat.	Cat/Sub-Cat Description	No. of Entities	Fee method	Scenario 1		Scenario 2		Scenario 3	
				<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>
05-01	0 to <1 MGD	8	Equation	\$855 + \$4,022 * Flow (MGD)	\$704 + \$3,018 * Flow (MGD)	\$850 + \$4,000 * Flow (MGD)	\$700 + \$3,000 * Flow (MGD)	\$550 + \$2,200 * Flow (MGD)	\$450 + \$1,900 * Flow (MGD)
			Range	\$855 to \$4,837	\$704 to \$3,692	\$850 to \$4,810	\$700 to \$3,670	\$550 to \$2,728	\$450 to \$2,331
05-02	>= 1 MGD	16	Equation	\$4,525 + \$377 * Flow (MGD)	\$3,621 + \$251 * Flow (MGD)	\$4,500 + \$375 * Flow (MGD)	\$3,600 + \$250 * Flow (MGD)	\$3,100 + \$200 * Flow (MGD)	\$2,500 + \$140 * Flow (MGD)
			Range	\$4,902 to \$15,835	\$3,872 to \$11,151	\$4,875 to \$15,750	\$3,850 to \$11,100	\$3,300 to \$9,100	\$2,640 to \$6,700

Reclaimed Water Comments:

"New Services" with "New Uses" must be clearly defined. All fee structures associated with the Reuse Program should remain within State Statute and a dedicate FTE should be assigned to the program.

SITE APPLICATIONS AND DESIGN REVIEW

Scenario 1:	2
Scenario 2:	2
Scenario 3:	4

	Scenario 1	Scenario 2	Scenario 3
Site applications and design review: percent change	35.1%	34.5%	9%

Site Application & Design Review Comments:

A 34.5%-35.1% increase seems unnecessary since the Division's latest fee proposal states, "the overall fee structure for site applications and design review will not change".

PRELIMINARY EFFLUENT LIMITATIONS (PELs)

Low complexity service:	4
Medium/low complexity service:	4
Medium complexity service:	4
High to very high complexity service:	4

Service Type	Application Fee	Anticipated Actions
Low complexity	\$600 (application)	Groundwater PELs
Medium/low complexity	\$1,100 (application)	Groundwater PELs with analysis of ambient groundwater levels.
Medium complexity	\$3,800 (application)	Surface water PELs, DWWTWs minors.
High to very high complexity	\$3,800 with application, additional - refer to hourly rate below.	Surface water PELs, DWWTW majors. Surface water PELs, water treatment plant reverse osmosis discharge.

PELs Comments

The differences between low and medium complexity need to be more clearly defined.

DISCHARGE PERMIT APPLICATIONS, APPLICATION SUPPLEMENTS AND PERMIT MODIFICATIONS

Applications and supplementals: fee is 50 percent of the annual fee. 2

Permit modifications: fee of 25 percent for minor amendments and 50 percent for major amendments. 2

Discharge Permit Comments:

Major vs. Minor amendments should be well defined for permit modifications.

Bobby Anastasov

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A LA CARTE

- Compliance assistance: 3
- Administrative Action: 3
- Low complexity service: 3
- Medium/low complexity service: 3
- Medium complexity service: 3
- High to very high complexity service: 3
- A la carte Comments:

Service Type	Application Fee	Example Actions
Compliance assistance	no fee	<ul style="list-style-type: none"> • Compliance assistance inspection or audit, upon request
Administrative action	\$80	<ul style="list-style-type: none"> • Permit transfer • NOX • Minor permit modification (removal of an outfall)
Low complexity service	\$600	<ul style="list-style-type: none"> • Regulatory exemption, confirmation of lagoon seepage rate
Medium/low complexity service	\$1,100	<ul style="list-style-type: none"> • Not anticipated at this time for PPU.
Medium complexity service	\$3,800	<ul style="list-style-type: none"> • Not anticipated at this time for PPU.
High to very high complexity service	\$3,800 submitted with application, additional - see hourly rates above	<ul style="list-style-type: none"> • Not anticipated at this time for PPU.

WORK GROUP RECOMMENDATIONS

- 1. Add accountability metrics to break information in to another level of detail by program area (e.g. biosolids, reuse, and pretreatment) to the WQCC annual report. 5
- 2. Ensure annual fees cover services including FAQs, application guidance, sample applications, permit requirement summaries/training (post-issuance consultation included), common failures/issues document and compliance forum at existing levels. 5
- 3. Include pre-issuance and/or pre-notice consultation in the annual fee packaged services. 5
- 4. Set a statutory fee cap for reclaimed water. Actual fees for program decided during triennial review. 5
- 5. For reclaimed water, fees are scaled on flow however an additional fee should be applied on a per user basis based on work load of compliance activities. 3
- 6. For reclaimed water, new services fees for this subsector are set to provide funding for approximately 300 hours. The recommendation is to increase from 300 to 600 for other reclaimed water services such as low risk discharge policy development or more streamlined approval of new uses. Add additional resources to the division to increase timeliness of NOAs. 4
- 7. Consider active replenishment of fund balance as a viable scenario (Scenario 5). 2

Recommendation Comments

POLICY CONSIDERATIONS FOR OVERALL SUCCESS

In developing concepts for a fee structure, stakeholders identified the need to strike a balance between certainty and flexibility. A more certain structure, for example, one with dollars in statute has trades offs in the ability to evolve services and spend additional time on complex issues. A more flexible system can result in a higher rate of change in fee amounts. Accountability was also an important concept expressed by stakeholders.

- 1. Certainty: 1
- 2. Flexibility: 3
- 3. Accountability: 2
- 4. Rationale for setting fees: 4
- 5. Subsidies for permit holders: 5
- 6. What do you think is an appropriate frequency to review fees and fee structure? (Select one): 3 Years
- If selected Other, please explain:
- 7. What do you think is the best manner to adjust for inflation?:

Bobby Anastasov

Representative for: The City of Aurora Water Department (Individual)

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Statute v. Commission

There are a number of considerations when assessing the roles of the Water Quality Control Commission and statutory authority. A different solution may be appropriate for each sector.

1. Fees established by the Water Quality Control Commission. 1
2. Fees established in statute with a statutory cap and periodic adjustment made as necessary by the Water Quality Control Commission. 1
3. A la carte services and fees established and managed by the Water Quality Control Commission. 1
4. A la carte services and fees established in statute. 3
5. Fee formulas in statute. 3
6. Fees in statute with an inflation clause. 4
7. Fees in statute without an adjustment for inflation (current model). 4

Fee Comments

Strongly support keeping fees in State Statute rather than set by the WQCC.

General Fund

There are different schools of thought for how general fund should be distributed in the Clean Water Program that range from no general fund to completely funded with general fund dollars.

1. The division has the discretion to spend as needed. 4
2. The only permit holders to receive general fund are those which involve governmental entities such as public utilities, local governments, or state agencies (e.g. Colorado Department of Transportation). 2
3. All permit holders receive some general funds but it should largely go to governmental entities. 2
4. All permit holders receive equal distribution based on a percentage. 2
5. All permit holders receive a percentage based on the department's discretion and other to be determined factors. 3
6. No permit holder general fund as it should be a completely cash funded program. 1
7. Only small public and private entities receive general fund. 2
8. Allocate general fund to program areas or permit activities with small numbers of permittees to keep fees reasonable. 2

General Fund Comments

General fund money should be available to spend at the Division's discretion to cover unfunded program areas, buffer the fluctuations in permit numbers, or temporary, high-resource projects. It should not be used to grow existing Division programs or staffing once fees adequately cover these activities.

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Final Ratings

- 1. Small workgroup meetings were helpful in increasing my understanding of sector specific fees and having dialogue about how to improve the fee structure for the specific group. 4
- 2. Large group meetings were helpful in understanding the department's position and providing an avenue for large group discussion on cross cutting topics of interest. 3
- 3. Meeting materials increased my overall level of understanding about the history of CleanWater Program fees and their history, overall department and division funding and how the division manages clean water program permitted activities. 5
- 4. Facilitation was effective and objective. 2
- 5. This process was successful at creating a trusting, open atmosphere to discuss issues of interest. 3
- 6. This process was helpful in building professional relationships with peers that I did not have before this process. 3

Final Comments

There was some good conversation/progress made during the small group meetings however, the same cannot be said for the larger group meetings. The large group meetings seemed to simply give an overview of the same general concepts brought forward in the small group meetings. Furthermore, due to the tight meeting schedule fully reviewing and comprehending the material prior to the meetings did provided to be somewhat challenging.

Cal Youngberg

Representative for: City of Longmont (Individual)

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Each number (from 1-5) next to a question denotes that person's level of agreement with that question. One denoted that they strongly disagreed and choosing five denoted they strongly agreed with the question. If there was no number, the person did not answer that question.

Did you attend the PPU workgroup meetings?: No

DOMESTIC WASTEWATER TREATMENT WORKS (DWWTWS)

DWWTW Scenario 1: 4
 DWWTW Scenario 2: 3
 DWWTW Scenario 3: 2

Cat./ Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1	Scenario 2	Scenario 3
01-01	0 to <1 MGD	439	Range	Equation: \$804 + \$4525 * Flow (MGD) \$804 to \$5,284	Equation: \$800 + \$4500 * Flow (MGD) \$800 to \$5,255	Equation: \$670 + \$3500 * Flow (MGD) \$670 to \$4,135
01-02	>= 1 MGD to 2.5 MGD	41	Set amount	\$8,228	\$8,191	\$6,638
01-03	>= 2.5 MGD to 10 MGD	39	Set amount	\$15,415	\$15,346	\$12,437
01-04	>= 10 MGD to 50 MGD	10	Set amount	\$26,723	\$26,604	\$21,560
01-05	>= 50 MGD to 100 MGD	2	Set amount	\$30,830	\$30,693	\$24,874
01-06	>= 100 MGD	1	Set amount	\$33,910	\$33,760	\$27,359

DWWTW Comments:

The Division has not presented enough information on costs and services to show where resources are aligned and where the actual program needs are. We are not against fee increases in general, the Division did not make a case for what the level of fees really need to be to adequately fund the required or core services, so it is difficult for us to provide meaningful feedback.

WATER TREATMENT PLANTS

Scenario1: 4
 Scenario2: 3
 Scenario3: 2

Cat./Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1	Scenario 2	Scenario 3
02-01	Individual permits	10	Set amount	\$6,313	\$6,246	\$3,400
02-02	General permits	94	Set amount	\$1,006	\$1,000	\$750

Water Treatment Plant Comments:

PRETREATMENT

Pretreatment Scenario 1: 4
 Pretreatment Scenario 2: 3
 Pretreatment Scenario 3: 4

Cat./ Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1	Scenario 2	Scenario 3
04-01	Division approved POTW	2	Set amount added to permit annual fee	\$2,413	\$2,400	\$2,400
04-02	EPA approved and unapproved POTW <1 MGD	213	Set amount added to permit annual fee	\$151	\$150	\$130
04-03	EPA approved and unapproved POTW >= 1 MGD	94	Set amount added to permit annual fee	\$503	\$500	\$400
04-04	Division-authorized Significant Industrial User	10	Set amount	\$1,006	\$1,000	\$700

Pretreatment Comments:

This fee structure appears to be transferring the costs previously covered by SIUs in an approved program to POTWs with approved programs. While we agree that SIUs covered by an approved program should not be charged for statewide coverage of industries in areas without approved programs, there is no explanation of what services are or will be provided for the added fees to POTWs. This change will eliminate the billing to SIUs currently being done by the Division, so costs should actually decrease. Coverage for non-approved programs ideally would be from the general fund, not from charges to POTWs with approved programs. In addition, it has never been clear what services the Division actually provides for the fees collected. Although the cost is not large, our fees increase by 500%, not 32% as implied by the discussion in this fee proposal. Again, the Division has not provided enough information for us to give meaningful feedback.

Each number (from 1-5) next to a question denotes that person's level of agreement with that question. One denoted that they strongly disagreed and choosing five denoted they strongly agreed with the question. If there was no number, the person did not answer that question.

BIOSOLIDS

	With New Services	Without New Services	Cat./ Sub-cat.	Cat/Sub-Cat Description	No. of Entities	Fee method	Scenario 1		Scenario 2		Scenario 3	
							<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>
Scenario 1:	4	2	03-01	Beneficial reuse	92	Equation:	\$3.82 per dry ton	\$2.51 per dry ton	\$3.80 per dry ton	\$2.50 per dry ton	\$2.70 per dry ton	\$2.05 per dry ton
Scenario 2:	3	2				Range	\$80 to \$90,057	\$80 to \$59,173	\$80 to \$89,585	\$80 to \$58,938	\$80 to \$63,653	\$80 to \$48,329
Scenario 3:	2	2	03-02	DWWTWs (generators) <30 dry tons	441	Set amount	\$121	\$35	\$120	\$35	\$78	\$35
			03-03	DWWTWs (generators) >= 30 dry tons	92	Set amount	\$804	\$35	\$800	\$35	\$420	\$35

Biosolids Comments:

It is difficult to comment on this proposal because of the uncertainty about delegation of the biosolids program. While we support the concept of delegation, the Division has not presented a good case for what services would be provided for these fees. The use of current fee income has also not been clearly defined for stakeholders.

RECLAIMED WATER

	With New Services	Without New Services	Cat./ Sub-cat.	Cat/Sub-Cat Description	No. of Entities	Fee method	Scenario 1		Scenario 2		Scenario 3	
							<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>
Scenario 1:			05-01	0 to <1 MGD	8	Equation	\$855 + \$4,022 * Flow (MGD)	\$704 + \$3,018 * Flow (MGD)	\$850 + \$4,000 * Flow (MGD)	\$700 + \$3,000 * Flow (MGD)	\$550 + \$2,200 * Flow (MGD)	\$450 + \$1,900 * Flow (MGD)
Scenario 2:						Range	\$855 to \$4,837	\$704 to \$3,692	\$850 to \$4,810	\$700 to \$3,670	\$550 to \$2,728	\$450 to \$2,331
Scenario 3:			05-02	>= 1 MGD	16	Equation	\$4,525 + \$377 * Flow (MGD)	\$3,621 + \$251 * Flow (MGD)	\$4,500 + \$375 * Flow (MGD)	\$3,600 + \$250 * Flow (MGD)	\$3,100 + \$200 * Flow (MGD)	\$2,500 + \$140 * Flow (MGD)
						Range	\$4,902 to \$15,835	\$3,872 to \$11,151	\$4,875 to \$15,750	\$3,850 to \$11,100	\$3,300 to \$9,100	\$2,640 to \$6,700

Reclaimed Water Comments:

We have no reclaimed water interests, so we do not feel that we can comment on this.

SITE APPLICATIONS AND DESIGN REVIEW

		Scenario 1	Scenario 2	Scenario 3	
Scenario 1:	2				
Scenario 2:	2				
Scenario 3:	2				
		Site applications and design review: percent change	35.1%	34.5%	9%

Site Application & Design Review Comments:

In recent years, the site approval process has expanded into areas that do not provide benefits to either stakeholders or the environment. Before supporting a fee increase we would like to see the Division redirect their site approval efforts to make the process more meaningful and focus on the real impacts to human health and the environment. This may require a change in the Division's interpretation of the current regulations.

PRELIMINARY EFFLUENT LIMITATIONS (PELs)

		Service Type	Application Fee	Anticipated Actions
Low complexity service:	4	Low complexity	\$600 (application)	Groundwater PELs
Medium/low complexity service:	4	Medium/low complexity	\$1,100 (application)	Groundwater PELs with analysis of ambient groundwater levels.
Medium complexity service:	4	Medium complexity	\$3,800 (application)	Surface water PELs, DWWTWs minors.
High to very high complexity service:	4	High to very high complexity	\$3,800 with application, additional - refer to hourly rate below.	Surface water PELs, DWWTW majors. Surface water PELs, water treatment plant reverse osmosis discharge.

PELs Comments

The Division should consider a cap on the total fee for high to high complexity PELs.

DISCHARGE PERMIT APPLICATIONS, APPLICATION SUPPLEMENTS AND PERMIT MODIFICATIONS

Cal Youngberg

Representative for: City of Longmont (Individual)

Phone: 303-651-8399

Email: cal.youngberg@ci.longmont.co.us

Each number (from 1-5) next to a question denotes that person's level of agreement with that question. One denoted that they strongly disagreed and choosing five denoted they strongly agreed with the question. If there was no number, the person did not answer that question.

Applications and supplementals: fee is 50 percent of the annual fee. 3

Permit modifications: fee of 25 percent for minor amendments and 50 percent for major amendments. 2

Discharge Permit Comments:

Without a clear idea of what a major or minor modification is, it is difficult for us to support a fee of 25-50% of the annual permit fee. This appears to not consider individual conditions that would affect the level of effort required for a permit modification.

A LA CARTE

- Compliance assistance: 5
- Administrative Action: 5
- Low complexity service: 4
- Medium/low complexity service: 2
- Medium complexity service: 2
- High to very high complexity service: 2

Service Type	Application Fee	Example Actions
Compliance assistance	no fee	<ul style="list-style-type: none"> • Compliance assistance inspection or audit, upon request
Administrative action	\$80	<ul style="list-style-type: none"> • Permit transfer • NOX • Minor permit modification (removal of an outfall)
Low complexity service	\$600	<ul style="list-style-type: none"> • Regulatory exemption, confirmation of lagoon seepage rate
Medium/low complexity service	\$1,100	<ul style="list-style-type: none"> • Not anticipated at this time for PPU.
Medium complexity service	\$3,800	<ul style="list-style-type: none"> • Not anticipated at this time for PPU.
High to very high complexity service	\$3,800 submitted with application, additional - see hourly rates above	<ul style="list-style-type: none"> • Not anticipated at this time for PPU.

A la carte Comments:

The medium to high complexity services are not described or proposed so we don't have enough information to support them.

WORK GROUP RECOMMENDATIONS

- 1. Add accountability metrics to break information in to another level of detail by program area (e.g. biosolids, reuse, and pretreatment) to the WQCC annual report. 5
- 2. Ensure annual fees cover services including FAQs, application guidance, sample applications, permit requirement summaries/training (post-issuance consultation included), common failures/issues document and compliance forum at existing levels. 4
- 3. Include pre-issuance and/or pre-notice consultation in the annual fee packaged services. 3
- 4. Set a statutory fee cap for reclaimed water. Actual fees for program decided during triennial review.
- 5. For reclaimed water, fees are scaled on flow however an additional fee should be applied on a per user basis based on work load of compliance activities. 2
- 6. For reclaimed water, new services fees for this subsector are set to provide funding for approximately 300 hours. The recommendation is to increase from 300 to 600 for other reclaimed water services such as low risk discharge policy development or more streamlined approval of new uses. Add additional resources to the division to increase timeliness of NOAs.
- 7. Consider active replenishment of fund balance as a viable scenario (Scenario 5). 2

Recommendation Comments

The intent or rationale for recommendation #2 is not clear and more information is needed to determine which aspects of service coverage we can support.

POLICY CONSIDERATIONS FOR OVERALL SUCCESS

Cal Youngberg

Representative for: City of Longmont (Individual)

Phone: 303-651-8399

Email: cal.youngberg@ci.longmont.co.us

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In developing concepts for a fee structure, stakeholders identified the need to strike a balance between certainty and flexibility. A more certain structure, for example, one with dollars in statute has trades offs in the ability to evolve services and spend additional time on complex issues. A more flexible system can result in a higher rate of change in fee amounts. Accountability was also an important concept expressed by stakeholders.

1. Certainty: 3
2. Flexibility: 4
3. Accountability: 1
4. Rationale for setting fees: 2
5. Subsidies for permit holders: 5
6. What do you think is an appropriate frequency to review fees and fee structure? (Select one): 5 Years

If selected Other, please explain:

7. What do you think is the best manner to adjust for inflation?: We suggest the Division use a method to assess and justify actual needs for the next fee cycle and adjust the fees accordingly. CPI or other inflation methods do not necessarily reflect the Division's work plan or needs.

Statute v. Commission

There are a number of considerations when assessing the roles of the Water Quality Control Commission and statutory authority. A different solution may be appropriate for each sector.

1. Fees established by the Water Quality Control Commission. 1
2. Fees established in statute with a statutory cap and periodic adjustment made as necessary by the Water Quality Control Commission. 2
3. A la carte services and fees established and managed by the Water Quality Control Commission. 2
4. A la carte services and fees established in statute. 5
5. Fee formulas in statute. 1
6. Fees in statute with an inflation clause. 1
7. Fees in statute without an adjustment for inflation (current model). 4

Fee Comments

We do not support fee setting authority by the WQCC unless their authority and process are clearly defined by statute.

Cal Youngberg

Representative for: City of Longmont (Individual)

Phone: 303-651-8399

Email: cal.youngberg@ci.longmont.co.us

Each number (from 1-5) next to a question denotes that person's level of agreement with that question. One denoted that they strongly disagreed and choosing five denoted they strongly agreed with the question. If there was no number, the person did not answer that question.

General Fund

There are different schools of thought for how general fund should be distributed in the Clean Water Program that range from no general fund to completely funded with general fund dollars.

1. The division has the discretion to spend as needed. 4
2. The only permit holders to receive general fund are those which involve governmental entities such as public utilities, local governments, or state agencies (e.g. Colorado Department of Transportation). 1
3. All permit holders receive some general funds but it should largely go to governmental entities. 1
4. All permit holders receive equal distribution based on a percentage. 1
5. All permit holders receive a percentage based on the department's discretion and other to be determined factors. 1
6. No permit holder general fund as it should be a completely cash funded program. 4
7. Only small public and private entities receive general fund. 2
8. Allocate general fund to program areas or permit activities with small numbers of permittees to keep fees reasonable. 1

General Fund Comments

Final Ratings

1. Small workgroup meetings were helpful in increasing my understanding of sector specific fees and having dialogue about how to improve the fee structure for the specific group.
2. Large group meetings were helpful in understanding the department's position and providing an avenue for large group discussion on cross cutting topics of interest.
3. Meeting materials increased my overall level of understanding about the history of Clean Water Program fees and their history, overall department and division funding and how the division manages clean water program permitted activities.
4. Facilitation was effective and objective.
5. This process was successful at creating a trusting, open atmosphere to discuss issues of interest.
6. This process was helpful in building professional relationships with peers that I did not have before this process.

Final Comments

Since we were only able to attend one of the meetings we do not have specific comments. We appreciate the Division coordinating this process, but the information provided does not allow us to adequately assess all of the proposals. The Division did not present enough justification for tying financial needs to the work load or Division resource allocations. This kind of information will be needed as we move ahead with the different funding scenarios.

Rick Willard

Representative for: CDOT (Group)

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Email: richard.willard@state.co.us

Each number (from 1-5) next to a question denotes that person's level of agreement with that question. One denoted that they strongly disagreed and choosing five denoted they strongly agreed with the question. If there was no number, the person did not answer that question.

Did you attend the PPU workgroup meetings?: Yes

DOMESTIC WASTEWATER TREATMENT WORKS (DWWTWS)

DWWTW Scenario 1:	3	<table border="1"> <thead> <tr> <th>Cat./ Sub-Cat.</th> <th>Cat/Sub-Cat. Description</th> <th>No. of Entities</th> <th>Fee Methodology</th> <th colspan="2">Scenario 1</th> <th colspan="2">Scenario 2</th> <th colspan="2">Scenario 3</th> </tr> </thead> <tbody> <tr> <td>01-01</td> <td>0 to <1 MGD</td> <td>439</td> <td>Range</td> <td>Equation: \$804 + \$4525 * Flow (MGD)</td> <td>\$804 to \$5,284</td> <td>Equation: \$800 + \$4500 * Flow (MGD)</td> <td>\$800 to \$5,255</td> <td>Equation: \$670 + \$3500 * Flow (MGD)</td> <td>\$670 to \$4,135</td> </tr> <tr> <td>01-02</td> <td>>= 1 MGD to 2.5 MGD</td> <td>41</td> <td>Set amount</td> <td colspan="2">\$8,228</td> <td colspan="2">\$8,191</td> <td colspan="2">\$6,638</td> </tr> <tr> <td>01-03</td> <td>>= 2.5 MGD to 10 MGD</td> <td>39</td> <td>Set amount</td> <td colspan="2">\$15,415</td> <td colspan="2">\$15,346</td> <td colspan="2">\$12,437</td> </tr> <tr> <td>01-04</td> <td>>= 10 MGD to 50 MGD</td> <td>10</td> <td>Set amount</td> <td colspan="2">\$26,723</td> <td colspan="2">\$26,604</td> <td colspan="2">\$21,560</td> </tr> <tr> <td>01-05</td> <td>>= 50 MGD to 100 MGD</td> <td>2</td> <td>Set amount</td> <td colspan="2">\$30,830</td> <td colspan="2">\$30,693</td> <td colspan="2">\$24,874</td> </tr> <tr> <td>01-06</td> <td>>= 100 MGD</td> <td>1</td> <td>Set amount</td> <td colspan="2">\$33,910</td> <td colspan="2">\$33,760</td> <td colspan="2">\$27,359</td> </tr> </tbody> </table>	Cat./ Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1		Scenario 2		Scenario 3		01-01	0 to <1 MGD	439	Range	Equation: \$804 + \$4525 * Flow (MGD)	\$804 to \$5,284	Equation: \$800 + \$4500 * Flow (MGD)	\$800 to \$5,255	Equation: \$670 + \$3500 * Flow (MGD)	\$670 to \$4,135	01-02	>= 1 MGD to 2.5 MGD	41	Set amount	\$8,228		\$8,191		\$6,638		01-03	>= 2.5 MGD to 10 MGD	39	Set amount	\$15,415		\$15,346		\$12,437		01-04	>= 10 MGD to 50 MGD	10	Set amount	\$26,723		\$26,604		\$21,560		01-05	>= 50 MGD to 100 MGD	2	Set amount	\$30,830		\$30,693		\$24,874		01-06	>= 100 MGD	1	Set amount	\$33,910		\$33,760		\$27,359	
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WATER TREATMENT PLANTS

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Water Treatment Plant Comments:

PRETREATMENT

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BIOSOLIDS

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Biosolids Comments:

RECLAIMED WATER

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Reclaimed Water Comments:

Rick Willard

Representative for: CDOT (Group)

Phone: 303-757-9343

Email: richard.willard@state.co.us

Each number (from 1-5) next to a question denotes that person's level of agreement with that question. One denoted that they strongly disagreed and choosing five denoted they strongly agreed with the question. If there was no number, the person did not answer that question.

SITE APPLICATIONS AND DESIGN REVIEW

Scenario 1: 3
Scenario 2: 3
Scenario 3: 3

	Scenario 1	Scenario 2	Scenario 3
Site applications and design review: percent change	35.1%	34.5%	9%

Site Application & Design Review Comments:

PRELIMINARY EFFLUENT LIMITATIONS (PELs)

Low complexity service: 3
Medium/low complexity service: 3
Medium complexity service: 3
High to very high complexity service: 3

Service Type	Application Fee	Anticipated Actions
Low complexity	\$600 (application)	Groundwater PELs
Medium/low complexity	\$1,100 (application)	Groundwater PELs with analysis of ambient groundwater levels.
Medium complexity	\$3,800 (application)	Surface water PELs, DWWTWs minors.
High to very high complexity	\$3,800 with application, additional - refer to hourly rate below.	Surface water PELs, DWWTW majors. Surface water PELs, water treatment plant reverse osmosis discharge.

PELs Comments

DISCHARGE PERMIT APPLICATIONS, APPLICATION SUPPLEMENTS AND PERMIT MODIFICATIONS

Applications and supplementals: fee is 50 percent of the annual fee. 3

Permit modifications: fee of 25 percent for minor amendments and 50 percent for major amendments. 3

Discharge Permit Comments:

"minor" and "major" amendments need to be fully defined

A LA CARTE

Compliance assistance: 3
Administrative Action: 3
Low complexity service: 3
Medium/low complexity service: 3
Medium complexity service: 3
High to very high complexity service: 3

Service Type	Application Fee	Example Actions
Compliance assistance	no fee	• Compliance assistance inspection or audit, upon request
Administrative action	\$80	• Permit transfer • NOX • Minor permit modification (removal of an outfall)
Low complexity service	\$600	• Regulatory exemption, confirmation of lagoon seepage rate
Medium/low complexity service	\$1,100	• Not anticipated at this time for PPU.
Medium complexity service	\$3,800	• Not anticipated at this time for PPU.
High to very high complexity service	\$3,800 submitted with application, additional - see hourly rates above	• Not anticipated at this time for PPU.

A la carte Comments:

WORK GROUP RECOMMENDATIONS

1. Add accountability metrics to break information in to another level of detail by program area (e.g. biosolids, reuse, and pretreatment) to the WQCC annual report. 3
2. Ensure annual fees cover services including FAQs, application guidance, sample applications, permit requirement summaries/training (post-issuance consultation included), common failures/issues document and compliance forum at existing levels. 3
3. Include pre-issuance and/or pre-notice consultation in the annual fee packaged services. 3
4. Set a statutory fee cap for reclaimed water. Actual fees for program decided during triennial review. 3
5. For reclaimed water, fees are scaled on flow however an additional fee should be applied on a per user basis based on work load of compliance activities. 3

Rick Willard

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- 6. For reclaimed water, new services fees for this subsector are set to provide funding for approximately 300 hours. The recommendation is to increase from 300 to 600 for other reclaimed water services such as low risk discharge policy development or more streamlined approval of new uses. Add additional resources to the division to increase timeliness of NOAs. 3
- 7. Consider active replenishment of fund balance as a viable scenario (Scenario 5). 3

Recommendation Comments

POLICY CONSIDERATIONS FOR OVERALL SUCCESS

In developing concepts for a fee structure, stakeholders identified the need to strike a balance between certainty and flexibility. A more certain structure, for example, one with dollars in statute has trades offs in the ability to evolve services and spend additional time on complex issues. A more flexible system can result in a higher rate of change in fee amounts. Accountability was also an important concept expressed by stakeholders.

- 1. Certainty: 2
- 2. Flexibility: 2
- 3. Accountability: 2
- 4. Rationale for setting fees: 5
- 5. Subsidies for permit holders: 5
- 6. What do you think is an appropriate frequency to review fees and fee structure? (Select one): 5 Years
If selected Other, please explain:
- 7. What do you think is the best manner to adjust for inflation?: Language in the State statute

Statute v. Commission

There are a number of considerations when assessing the roles of the Water Quality Control Commission and statutory authority. A different solution may be appropriate for each sector.

- 1. Fees established by the Water Quality Control Commission. 2
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Fee Comments

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General Fund

There are different schools of thought for how general fund should be distributed in the Clean Water Program that range from no general fund to completely funded with general fund dollars.

1. The division has the discretion to spend as needed. 2
2. The only permit holders to receive general fund are those which involve governmental entities such as public utilities, local governments, or state agencies (e.g. Colorado Department of Transportation). 3
3. All permit holders receive some general funds but it should largely go to governmental entities. 3
4. All permit holders receive equal distribution based on a percentage. 3
5. All permit holders receive a percentage based on the department's discretion and other to be determined factors. 3
6. No permit holder general fund as it should be a completely cash funded program. 3
7. Only small public and private entities receive general fund. 3
8. Allocate general fund to program areas or permit activities with small numbers of permittees to keep fees reasonable. 3

General Fund Comments

Final Ratings

1. Small workgroup meetings were helpful in increasing my understanding of sector specific fees and having dialogue about how to improve the fee structure for the specific group. 4
2. Large group meetings were helpful in understanding the department's position and providing an avenue for large group discussion on cross cutting topics of interest. 3
3. Meeting materials increased my overall level of understanding about the history of Clean Water Program fees and their history, overall department and division funding and how the division manages clean water program permitted activities. 3
4. Facilitation was effective and objective. 3
5. This process was successful at creating a trusting, open atmosphere to discuss issues of interest. 3
6. This process was helpful in building professional relationships with peers that I did not have before this process. 3

Final Comments

Time allotted prevented full completion of many discussions

Dave Akers

Representative for: None (Individual)

Phone: 303-515-0586

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Each number (from 1-5) next to a question denotes that person's level of agreement with that question. One denoted that they strongly disagreed and choosing five denoted they strongly agreed with the question. If there was no number, the person did not answer that question.

Did you attend the PPU workgroup meetings?: Yes

DOMESTIC WASTEWATER TREATMENT WORKS (DWWTWS)

DWWTW Scenario 1: 3
DWWTW Scenario 2: 4
DWWTW Scenario 3: 4

Cat./Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1		Scenario 2		Scenario 3	
01-01	0 to <1 MGD	439	Range	Equation: \$804 + \$4525 * Flow (MGD)	\$804 to \$5,284	Equation: \$800 + \$4500 * Flow (MGD)	\$800 to \$5,255	Equation: \$670 + \$3500 * Flow (MGD)	\$670 to \$4,135
01-02	>= 1 MGD to 2.5 MGD	41	Set amount	\$8,228		\$8,191		\$6,638	
01-03	>= 2.5 MGD to 10 MGD	39	Set amount	\$15,415		\$15,346		\$12,437	
01-04	>= 10 MGD to 50 MGD	10	Set amount	\$26,723		\$26,604		\$21,560	
01-05	>= 50 MGD to 100 MGD	2	Set amount	\$30,830		\$30,693		\$24,874	
01-06	>= 100 MGD	1	Set amount	\$33,910		\$33,760		\$27,359	

DWWTW Comments:

It would help if the Department would provide information on the reserve such as how the amount of funds in the reserve has changed since the last fee increase and the projected program costs (based on being fully staffed) and actual costs for the past three to five years.

As I understand, without a fee increase or increase in general funds, the Division will be operating the permit program at a deficit in FY 2015-16 based on information provided during the October PPU small group meeting. Under scenario #1, with fee increases to fund only the cost of the program and not for building a reserve, how long would the remaining reserve after the current (14-15) fiscal year last? The answer to this question should take into account increases in costs due to salary increases and other increases such as for health insurance?

WATER TREATMENT PLANTS

Scenario1: 3
Scenario2: 4
Scenario3: 4

Cat./Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1	Scenario 2	Scenario 3
02-01	Individual permits	10	Set amount	\$6,313	\$6,246	\$3,400
02-02	General permits	94	Set amount	\$1,006	\$1,000	\$750

Water Treatment Plant Comments:

PRETREATMENT

Pretreatment Scenario 1: 3
Pretreatment Scenario 2: 3
Pretreatment Scenario 3: 2

Cat./Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1	Scenario 2	Scenario 3
04-01	Division approved POTW	2	Set amount added to permit annual fee	\$2,413	\$2,400	\$2,400
04-02	EPA approved and unapproved POTW <1 MGD	213	Set amount added to permit annual fee	\$151	\$150	\$130
04-03	EPA approved and unapproved POTW >= 1 MGD	94	Set amount added to permit annual fee	\$503	\$500	\$400
04-04	Division-authorized Significant Industrial User	10	Set amount	\$1,006	\$1,000	\$700

Pretreatment Comments:

Given the significant restructuring of the pretreatment categories it is difficult to see how the scenarios, particularly scenario #1, overlay onto the new system.

Also, is the Division spending enough additional time on the Division-issued POTW permits to justify the difference in fees compared to the other sub-categories, realizing that it has to renew the permits?

Dave Akers

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BIOSOLIDS

	With New Services	Without New Services	Cat./ Sub-cat.	Cat/Sub-Cat Description	No. of Entities	Fee method	Scenario 1		Scenario 2		Scenario 3	
							incl. new services	no new services	incl. new services	no new services	incl. new services	no new services
Scenario 1:	1	4	03-01	Beneficial reuse	92	Equation:	\$3.82 per dry ton	\$2.51 per dry ton	\$3.80 per dry ton	\$2.50 per dry ton	\$2.70 per dry ton	\$2.05 per dry ton
Scenario 2:	1	3				Range	\$80 to \$90,057	\$80 to \$59,173	\$80 to \$89,585	\$80 to \$58,938	\$80 to \$63,653	\$80 to \$48,329
Scenario 3:	1	2	03-02	DWWTWs (generators) <30 dry tons	441	Set amount	\$121	\$35	\$120	\$35	\$78	\$35
Biosolids Comments:			03-03	DWWTWs (generators) >= 30 dry tons	92	Set amount	\$804	\$35	\$800	\$35	\$420	\$35

I agree with the proposed changes in how fees would be assessed. I favor scenario 1 given that I don't see a subsidy issue here (scenario #2) and think the biosolids program, being applicable to PPU entities only, should not be funded with general funds.

Colorado has a mature biosolids program and the cost for delegation is very high (more than 50% greater) compared to what seems to be little benefit. Now is not the time for the Division to take on additional responsibility for delegation of the biosolids program as it has had its hands full just implementing its current permitting programs.

RECLAIMED WATER

	With New Services	Without New Services	Cat./ Sub-cat.	Cat/Sub-Cat Description	No. of Entities	Fee method	Scenario 1		Scenario 2		Scenario 3	
							incl. new services	no new services	incl. new services	no new services	incl. new services	no new services
Scenario 1:	3	4	05-01	0 to <1 MGD	8	Equation	\$855 + \$4,022 * Flow (MGD)	\$704 + \$3,018 * Flow (MGD)	\$850 + \$4,000 * Flow (MGD)	\$700 + \$3,000 * Flow (MGD)	\$550 + \$2,200 * Flow (MGD)	\$450 + \$1,900 * Flow (MGD)
Scenario 2:	3	4				Range	\$855 to \$4,837	\$704 to \$3,692	\$850 to \$4,810	\$700 to \$3,670	\$550 to \$2,728	\$450 to \$2,331
Scenario 3:	2	2	05-02	>= 1 MGD	16	Equation	\$4,525 + \$377 * Flow (MGD)	\$3,621 + \$251 * Flow (MGD)	\$4,500 + \$375 * Flow (MGD)	\$3,600 + \$250 * Flow (MGD)	\$3,100 + \$200 * Flow (MGD)	\$2,500 + \$140 * Flow (MGD)
Reclaimed Water Comments:						Range	\$4,902 to \$15,835	\$3,872 to \$11,151	\$4,875 to \$15,750	\$3,850 to \$11,100	\$3,300 to \$9,100	\$2,640 to \$6,700

I support additional flexibility in the reuse program to allow new uses to be approved but the additional cost (approximately a 30% increase in fees) seems high which is why I'm neutral on the additional services.

SITE APPLICATIONS AND DESIGN REVIEW

		Scenario 1	Scenario 2	Scenario 3
Scenario 1:	2			
Scenario 2:	2			
Scenario 3:	3			
Site applications and design review: percent change		35.1%	34.5%	9%

Site Application & Design Review Comments:

I see no reason to change the fee categories for site applications and design reviews. These processes are based on the size of the project and the current flow-based fees make sense. I suggest that the Division evaluate the reasons for cost overruns in this program and propose changes in its approach to reduce costs before higher fees are considered.

Dave Akers

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PRELIMINARY EFFLUENT LIMITATIONS (PELs)

- Low complexity service: 2
- Medium/low complexity service: 2
- Medium complexity service: 2
- High to very high complexity service: 2

Service Type	Application Fee	Anticipated Actions
Low complexity	\$600 (application)	Groundwater PELs
Medium/low complexity	\$1,100 (application)	Groundwater PELs with analysis of ambient groundwater levels.
Medium complexity	\$3,800 (application)	Surface water PELs, DWWTWs minors.
High to very high complexity	\$3,800 with application, additional - refer to hourly rate below.	Surface water PELs, DWWTW majors. Surface water PELs, water treatment plant reverse osmosis discharge.

PELs Comments

There is no way to compare the current fees and proposed fees and the new categories are not as clear as the current categories. No information has been provided to copel support for the change and it will be harder for project proponents to predict their cost based on the new categories. This change would not be an improvement.

DISCHARGE PERMIT APPLICATIONS, APPLICATION SUPPLEMENTS AND PERMIT MODIFICATIONS

- Applications and supplementals: fee is 50 percent of the annual fee. 4
- Permit modifications: fee of 25 percent for minor amendments and 50 percent for major amendments. 4

Discharge Permit Comments:

Setting a fee for new permits to cover costs for writing the permit and compliance oversight for the first fiscal year makes sense. Presumably this new revenue stream has been taken into account in determining the need for increases in the various sectors.

A LA CARTE

- Compliance assistance: 5
- Administrative Action: 4
- Low complexity service: 4
- Medium/low complexity service:
- Medium complexity service:
- High to very high complexity service:

Service Type	Application Fee	Example Actions
Compliance assistance	no fee	<ul style="list-style-type: none"> • Compliance assistance inspection or audit, upon request
Administrative action	\$80	<ul style="list-style-type: none"> • Permit transfer • NOX • Minor permit modification (removal of an out fall)
Low complexity service	\$600	<ul style="list-style-type: none"> • Regulatory exemption, confirmation of lagoon seepage rate
Medium/low complexity service	\$1,100	<ul style="list-style-type: none"> • Not anticipated at this time for PPU.
Medium complexity service	\$3,800	<ul style="list-style-type: none"> • Not anticipated at this time for PPU.
High to very high complexity service	\$3,800 submitted with application, additional - see hourly rates above	<ul style="list-style-type: none"> • Not anticipated at this time for PPU.

A la carte Comments:

It is difficult to evaluate these fees since the description, particularly for the higher fee categories (e.g., high complexity) is ambiguous.

WORK GROUP RECOMMENDATIONS

- 1. Add accountability metrics to break information in to another level of detail by program area (e.g. biosolids, reuse, and pretreatment) to the WQCC annual report. 5
- 2. Ensure annual fees cover services including FAQs, application guidance, sample applications, permit requirement summaries/training (post-issuance consultation included), common failures/issues document and compliance forum at existing levels. 3
- 3. Include pre-issuance and/or pre-notice consultation in the annual fee packaged services. 4
- 4. Set a statutory fee cap for reclaimed water. Actual fees for program decided during triennial review. 3
- 5. For reclaimed water, fees are scaled on flow however an additional fee should be applied on a per user basis based on work load of compliance activities. 2

Dave Akers

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6. For reclaimed water, new services fees for this subsector are set to provide funding for approximately 300 hours. The recommendation is to increase from 300 to 600 for other reclaimed water services such as low risk discharge policy development or more streamlined approval of new uses. Add additional resources to the division to increase timeliness of NOAs. 4

7. Consider active replenishment of fund balance as a viable scenario (Scenario 5). 2

Recommendation Comments

The discussion during the stakeholder meetings was productive but there is much information behind these proposals that needs to be evaluated to make informed decisions. This isn't a slam against CDPHE but a recognition that there was a lot of ground to cover in a relatively short period.

POLICY CONSIDERATIONS FOR OVERALL SUCCESS

In developing concepts for a fee structure, stakeholders identified the need to strike a balance between certainty and flexibility. A more certain structure, for example, one with dollars in statute has trades offs in the ability to evolve services and spend additional time on complex issues. A more flexible system can result in a higher rate of change in fee amounts. Accountability was also an important concept expressed by stakeholders.

- 1. Certainty: 2
- 2. Flexibility: 4
- 3. Accountability: 1
- 4. Rationale for setting fees: 3
- 5. Subsidies for permit holders: 5

6. What do you think is an appropriate frequency to review fees and fee structure? (Select one): 3 Years

If selected Other, please explain:

7. What do you think is the best manner to adjust for inflation?: Look at the percent increase in costs for the past three years and make a "best guess" to project an annual increase for the next three years.

Statute v. Commission

There are a number of considerations when assessing the roles of the Water Quality Control Commission and statutory authority. A different solution may be appropriate for each sector.

- 1. Fees established by the Water Quality Control Commission. 1
- 2. Fees established in statute with a statutory cap and periodic adjustment made as necessary by the Water Quality Control Commission. 2
- 3. A la carte services and fees established and managed by the Water Quality Control Commission. 3
- 4. A la carte services and fees established in statute. 3
- 5. Fee formulas in statute. 3
- 6. Fees in statute with an inflation clause. 4
- 7. Fees in statute without an adjustment for inflation (current model). 2

Fee Comments

Dave Akers

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General Fund

There are different schools of thought for how general fund should be distributed in the Clean Water Program that range from no general fund to completely funded with general fund dollars.

1. The division has the discretion to spend as needed. 3
2. The only permit holders to receive general fund are those which involve governmental entities such as public utilities, local governments, or state agencies (e.g. Colorado Department of Transportation). 1
3. All permit holders receive some general funds but it should largely go to governmental entities. 2
4. All permit holders receive equal distribution based on a percentage. 5
5. All permit holders receive a percentage based on the department's discretion and other to be determined factors. 3
6. No permit holder general fund as it should be a completely cash funded program. 1
7. Only small public and private entities receive general fund. 2
8. Allocate general fund to program areas or permit activities with small numbers of permittees to keep fees reasonable. 1

General Fund Comments

General funding of the permit program is appropriate given that the public derives a benefit from the permitting services provided by the Division. The current amount of general funds allocated to permitting should be maintained and distributed across all sectors on a pro-rata basis.

Final Ratings

1. Small workgroup meetings were helpful in increasing my understanding of sector specific fees and having dialogue about how to improve the fee structure for the specific group. 5
2. Large group meetings were helpful in understanding the department's position and providing an avenue for large group discussion on cross cutting topics of interest. 4
3. Meeting materials increased my overall level of understanding about the history of Clean Water Program fees and their history, overall department and division funding and how the division manages clean water program permitted activities. 4
4. Facilitation was effective and objective. 5
5. This process was successful at creating a trusting, open atmosphere to discuss issues of interest. 5
6. This process was helpful in building professional relationships with peers that I did not have before this process. 3

Final Comments

This was a really good process and will be improved if additional information, as described in previous comments, can be provided before a bill is developed. Perhaps this can be discussed at the December 10th and/or December 16th meeting.

Bobby Anastasov

Representative for: The City of Aurora Water Department (Individual)

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Each number (from 1-5) next to a question denotes that person's level of agreement with that question. One denoted that they strongly disagreed and choosing five denoted they strongly agreed with the question. If there was no number, the person did not answer that question.

Did you attend the PPU workgroup meetings?: Yes

DOMESTIC WASTEWATER TREATMENT WORKS (DWWTWS)

DWWTW Scenario 1: 2
 DWWTW Scenario 2: 2
 DWWTW Scenario 3: 4

Cat./ Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1		Scenario 2		Scenario 3	
01-01	0 to <1 MGD	439	Range	Equation: \$804 + \$4525 * Flow (MGD)	\$804 to \$5,284	Equation: \$800 + \$4500 * Flow (MGD)	\$800 to \$5,255	Equation: \$670 + \$3500 * Flow (MGD)	\$670 to \$4,135
01-02	>= 1 MGD to 2.5 MGD	41	Set amount	\$8,228		\$8,191		\$6,638	
01-03	>= 2.5 MGD to 10 MGD	39	Set amount	\$15,415		\$15,346		\$12,437	
01-04	>= 10 MGD to 50 MGD	10	Set amount	\$26,723		\$26,604		\$21,560	
01-05	>= 50 MGD to 100 MGD	2	Set amount	\$30,830		\$30,693		\$24,874	
01-06	>= 100 MGD	1	Set amount	\$33,910		\$33,760		\$27,359	

DWWTW Comments:

Balancing the budget between general and cash funds makes the most sense, since none of the three proposed scenarios include any new services.

WATER TREATMENT PLANTS

Scenario1: 3
 Scenario2: 3
 Scenario3: 4

Cat./Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1	Scenario 2	Scenario 3
02-01	Individual permits	10	Set amount	\$6,313	\$6,246	\$3,400
02-02	General permits	94	Set amount	\$1,006	\$1,000	\$750

Water Treatment Plant Comments:

PRETREATMENT

Pretreatment Scenario 1: 3
 Pretreatment Scenario 2: 3
 Pretreatment Scenario 3: 3

Cat./ Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1	Scenario 2	Scenario 3
04-01	Division approved POTW	2	Set amount added to permit annual fee	\$2,413	\$2,400	\$2,400
04-02	EPA approved and unapproved POTW <1 MGD	213	Set amount added to permit annual fee	\$151	\$150	\$130
04-03	EPA approved and unapproved POTW >= 1 MGD	94	Set amount added to permit annual fee	\$503	\$500	\$400
04-04	Division-authorized Significant Industrial User	10	Set amount	\$1,006	\$1,000	\$700

Pretreatment Comments:

BIOSOLIDS

	With New Services	Without New Services
Scenario 1:	3	3
Scenario 2:	3	3
Scenario 3:	3	3

Cat./ Sub-cat.	Cat/Sub-Cat Description	No. of Entities	Fee method	Scenario 1		Scenario 2		Scenario 3	
				incl. new services	no new services	incl. new services	no new services	incl. new services	no new services
03-01	Beneficial reuse	92	Equation:	\$3.82 per dry ton	\$2.51 per dry ton	\$3.80 per dry ton	\$2.50 per dry ton	\$2.70 per dry ton	\$2.05 per dry ton
			Range	\$80 to \$90,057	\$80 to \$59,173	\$80 to \$89,585	\$80 to \$58,938	\$80 to \$63,653	\$80 to \$48,329
03-02	DWWTWS (generators) <30 dry tons	441	Set amount	\$121	\$35	\$120	\$35	\$78	\$35
03-03	DWWTWS (generators) >= 30 dry tons	92	Set amount	\$804	\$35	\$800	\$35	\$420	\$35

Biosolids Comments:

Bobby Anastasov

Representative for: The City of Aurora Water Department (Individual)

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RECLAIMED WATER

	With New Services	Without New Services
Scenario 1:	2	3
Scenario 2:	2	3
Scenario 3:	2	4

Cat./ Sub-cat.	Cat/Sub-Cat Description	No. of Entities	Fee method	Scenario 1		Scenario 2		Scenario 3	
				<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>
05-01	0 to <1 MGD	8	Equation	\$855 + \$4,022 * Flow (MGD)	\$704 + \$3,018 * Flow (MGD)	\$850 + \$4,000 * Flow (MGD)	\$700 + \$3,000 * Flow (MGD)	\$550 + \$2,200 * Flow (MGD)	\$450 + \$1,900 * Flow (MGD)
			Range	\$855 to \$4,837	\$704 to \$3,692	\$850 to \$4,810	\$700 to \$3,670	\$550 to \$2,728	\$450 to \$2,331
05-02	>= 1 MGD	16	Equation	\$4,525 + \$377 * Flow (MGD)	\$3,621 + \$251 * Flow (MGD)	\$4,500 + \$375 * Flow (MGD)	\$3,600 + \$250 * Flow (MGD)	\$3,100 + \$200 * Flow (MGD)	\$2,500 + \$140 * Flow (MGD)
			Range	\$4,902 to \$15,835	\$3,872 to \$11,151	\$4,875 to \$15,750	\$3,850 to \$11,100	\$3,300 to \$9,100	\$2,640 to \$6,700

Reclaimed Water Comments:

"New Services" with "New Uses" must be clearly defined. All fee structures associated with the Reuse Program should remain within State Statute and a dedicate FTE should be assigned to the program.

SITE APPLICATIONS AND DESIGN REVIEW

Scenario 1:	2
Scenario 2:	2
Scenario 3:	4

	Scenario 1	Scenario 2	Scenario 3
Site applications and design review: percent change	35.1%	34.5%	9%

Site Application & Design Review Comments:

A 34.5%-35.1% increase seems unnecessary since the Division's latest fee proposal states, "the overall fee structure for site applications and design review will not change".

PRELIMINARY EFFLUENT LIMITATIONS (PELs)

Low complexity service:	4
Medium/low complexity service:	4
Medium complexity service:	4
High to very high complexity service:	4

Service Type	Application Fee	Anticipated Actions
Low complexity	\$600 (application)	Groundwater PELs
Medium/low complexity	\$1,100 (application)	Groundwater PELs with analysis of ambient groundwater levels.
Medium complexity	\$3,800 (application)	Surface water PELs, DWWTWs minors.
High to very high complexity	\$3,800 with application, additional - refer to hourly rate below.	Surface water PELs, DWWTW majors. Surface water PELs, water treatment plant reverse osmosis discharge.

PELs Comments

The differences between low and medium complexity need to be more clearly defined.

DISCHARGE PERMIT APPLICATIONS, APPLICATION SUPPLEMENTS AND PERMIT MODIFICATIONS

Applications and supplementals: fee is 50 percent of the annual fee. 2

Permit modifications: fee of 25 percent for minor amendments and 50 percent for major amendments. 2

Discharge Permit Comments:

Major vs. Minor amendments should be well defined for permit modifications.

Bobby Anastasov

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Phone: 720-859-4418

Email: ranasat@auroragov.org

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A LA CARTE

- Compliance assistance: 3
- Administrative Action: 3
- Low complexity service: 3
- Medium/low complexity service: 3
- Medium complexity service: 3
- High to very high complexity service: 3
- A la carte Comments:

Service Type	Application Fee	Example Actions
Compliance assistance	no fee	<ul style="list-style-type: none"> • Compliance assistance inspection or audit, upon request
Administrative action	\$80	<ul style="list-style-type: none"> • Permit transfer • NOX • Minor permit modification (removal of an outfall)
Low complexity service	\$600	<ul style="list-style-type: none"> • Regulatory exemption, confirmation of lagoon seepage rate
Medium/low complexity service	\$1,100	<ul style="list-style-type: none"> • Not anticipated at this time for PPU.
Medium complexity service	\$3,800	<ul style="list-style-type: none"> • Not anticipated at this time for PPU.
High to very high complexity service	\$3,800 submitted with application, additional - see hourly rates above	<ul style="list-style-type: none"> • Not anticipated at this time for PPU.

WORK GROUP RECOMMENDATIONS

- 1. Add accountability metrics to break information in to another level of detail by program area (e.g. biosolids, reuse, and pretreatment) to the WQCC annual report. 5
- 2. Ensure annual fees cover services including FAQs, application guidance, sample applications, permit requirement summaries/training (post-issuance consultation included), common failures/issues document and compliance forum at existing levels. 5
- 3. Include pre-issuance and/or pre-notice consultation in the annual fee packaged services. 5
- 4. Set a statutory fee cap for reclaimed water. Actual fees for program decided during triennial review. 5
- 5. For reclaimed water, fees are scaled on flow however an additional fee should be applied on a per user basis based on work load of compliance activities. 3
- 6. For reclaimed water, new services fees for this subsector are set to provide funding for approximately 300 hours. The recommendation is to increase from 300 to 600 for other reclaimed water services such as low risk discharge policy development or more streamlined approval of new uses. Add additional resources to the division to increase timeliness of NOAs. 4
- 7. Consider active replenishment of fund balance as a viable scenario (Scenario 5). 2

Recommendation Comments

POLICY CONSIDERATIONS FOR OVERALL SUCCESS

In developing concepts for a fee structure, stakeholders identified the need to strike a balance between certainty and flexibility. A more certain structure, for example, one with dollars in statute has trades offs in the ability to evolve services and spend additional time on complex issues. A more flexible system can result in a higher rate of change in fee amounts. Accountability was also an important concept expressed by stakeholders.

- 1. Certainty: 1
- 2. Flexibility: 3
- 3. Accountability: 2
- 4. Rationale for setting fees: 4
- 5. Subsidies for permit holders: 5
- 6. What do you think is an appropriate frequency to review fees and fee structure? (Select one): 3 Years
- If selected Other, please explain:
- 7. What do you think is the best manner to adjust for inflation?:

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Statute v. Commission

There are a number of considerations when assessing the roles of the Water Quality Control Commission and statutory authority. A different solution may be appropriate for each sector.

- | | |
|--|---|
| 1. Fees established by the Water Quality Control Commission. | 1 |
| 2. Fees established in statute with a statutory cap and periodic adjustment made as necessary by the Water Quality Control Commission. | 1 |
| 3. A la carte services and fees established and managed by the Water Quality Control Commission. | 1 |
| 4. A la carte services and fees established in statute. | 3 |
| 5. Fee formulas in statute. | 3 |
| 6. Fees in statute with an inflation clause. | 4 |
| 7. Fees in statute without an adjustment for inflation (current model). | 4 |

Fee Comments

Strongly support keeping fees in State Statute rather than set by the WQCC.

General Fund

There are different schools of thought for how general fund should be distributed in the Clean Water Program that range from no general fund to completely funded with general fund dollars.

- | | |
|---|---|
| 1. The division has the discretion to spend as needed. | 4 |
| 2. The only permit holders to receive general fund are those which involve governmental entities such as public utilities, local governments, or state agencies (e.g. Colorado Department of Transportation). | 2 |
| 3. All permit holders receive some general funds but it should largely go to governmental entities. | 2 |
| 4. All permit holders receive equal distribution based on a percentage. | 2 |
| 5. All permit holders receive a percentage based on the department's discretion and other to be determined factors. | 3 |
| 6. No permit holder general fund as it should be a completely cash funded program. | 1 |
| 7. Only small public and private entities receive general fund. | 2 |
| 8. Allocate general fund to program areas or permit activities with small numbers of permittees to keep fees reasonable. | 2 |

General Fund Comments

General fund money should be available to spend at the Division's discretion to cover unfunded program areas, buffer the fluctuations in permit numbers, or temporary, high-resource projects. It should not be used to grow existing Division programs or staffing once fees adequately cover these activities.

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Each number (from 1-5) next to a question denotes that person's level of agreement with that question. One denoted that they strongly disagreed and choosing five denoted they strongly agreed with the question. If there was no number, the person did not answer that question.

Final Ratings

- 1. Small workgroup meetings were helpful in increasing my understanding of sector specific fees and having dialogue about how to improve the fee structure for the specific group. 4
- 2. Large group meetings were helpful in understanding the department's position and providing an avenue for large group discussion on cross cutting topics of interest. 3
- 3. Meeting materials increased my overall level of understanding about the history of CleanWater Program fees and their history, overall department and division funding and how the division manages clean water program permitted activities. 5
- 4. Facilitation was effective and objective. 2
- 5. This process was successful at creating a trusting, open atmosphere to discuss issues of interest. 3
- 6. This process was helpful in building professional relationships with peers that I did not have before this process. 3

Final Comments

There was some good conversation/progress made during the small group meetings however, the same cannot be said for the larger group meetings. The large group meetings seemed to simply give an overview of the same general concepts brought forward in the small group meetings. Furthermore, due to the tight meeting schedule fully reviewing and comprehending the material prior to the meetings did provided to be somewhat challenging.

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Did you attend the PPU workgroup meetings?: Yes

DOMESTIC WASTEWATER TREATMENT WORKS (DWWTWS)

Cat./Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1	Scenario 2	Scenario 3
01-01	0 to <1 MGD	439	Range	Equation: \$804 + \$4525 * Flow (MGD) \$804 to \$5,284	Equation: \$800 + \$4500 * Flow (MGD) \$800 to \$5,255	Equation: \$670 + \$3500 * Flow (MGD) \$670 to \$4,135
DWWTW Scenario 1:	1					
DWWTW Scenario 2:	1					
DWWTW Scenario 3:	5					
01-02	>= 1 MGD to 2.5 MGD	41	Set amount	\$8,228	\$8,191	\$6,638
01-03	>= 2.5 MGD to 10 MGD	39	Set amount	\$15,415	\$15,346	\$12,437
01-04	>= 10 MGD to 50 MGD	10	Set amount	\$26,723	\$26,604	\$21,560
01-05	>= 50 MGD to 100 MGD	2	Set amount	\$30,830	\$30,693	\$24,874
01-06	>= 100 MGD	1	Set amount	\$33,910	\$33,760	\$27,359
DWWTW Comments:						

PWMDs current annual Wastewater Treatment Plant (WWTP) fee is \$6,090. The WQCDs annual inspection of PWMD WWTP takes at least one day plus some follow up. WQCD reviews submitted Discharge Monitoring Reports (DMRs) and reports any issues to PWMD. PWMD would support the current WWTP fee with less than a 10% fee increase (i.e., Scenario 3 = \$6,638.).

WATER TREATMENT PLANTS

Cat./Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1	Scenario 2	Scenario 3
02-01	Individual permits	10	Set amount	\$6,313	\$6,246	\$3,400
02-02	General permits	94	Set amount	\$1,006	\$1,000	\$750
Scenario1:	1					
Scenario2:	1					
Scenario3:	1					

Water Treatment Plant Comments:

PWMDs current annual Water Treatment Plant (WTP) fee is \$1,850. In 2014 the WQCD has been much more hands on by reminding PWMD of upcoming sample requirements and supplying consultants to analyze treatment processes. This is the first time that the WQCD has contacted PWMD before a problem occurred. If this continues, PWMD would support the current WTP fee with less than a 10% fee increase. If it goes back to the way it was (no contact), then PWMD would not support an increase. Scenarios 1, 2 and 3 greatly exceed PWMDs current WTP fee, so PWMD strongly disagrees with Scenarios 1, 2 and 3.

PRETREATMENT

Cat./Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1	Scenario 2	Scenario 3
04-01	Division approved POTW	2	Set amount added to permit annual fee	\$2,413	\$2,400	\$2,400
04-02	EPA approved and unapproved POTW <1 MGD	213	Set amount added to permit annual fee	\$151	\$150	\$130
04-03	EPA approved and unapproved POTW >= 1 MGD	94	Set amount added to permit annual fee	\$503	\$500	\$400
04-04	Division-authorized Significant Industrial User	10	Set amount	\$1,006	\$1,000	\$700
Pretreatment Scenario 1:	1					
Pretreatment Scenario 2:	1					
Pretreatment Scenario 3:	1					
Pretreatment Comments:						

PWMDs current annual Pretreatment fee is \$81. PWMD has the ability to charge any pretreatment fees, but currently has none. PWMD does not know what it gets for its current fee. Scenarios 1, 2 and 3 greatly exceed PWMDs current Pretreatment fee, so PWMD strongly disagrees with Scenarios 1, 2 and 3.

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BIOSOLIDS

With New Services Without New Services

Scenario 1:

Scenario 2:

Scenario 3:

Biosolids Comments:

Cat./ Sub-cat.	Cat/Sub-Cat Description	No. of Entities	Fee method	Scenario 1		Scenario 2		Scenario 3	
				<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>
03-01	Beneficial reuse	92	Equation:	\$3.82 per dry ton	\$2.51 per dry ton	\$3.80 per dry ton	\$2.50 per dry ton	\$2.70 per dry ton	\$2.05 per dry ton
			Range	\$80 to \$90,057	\$80 to \$59,173	\$80 to \$89,585	\$80 to \$58,938	\$80 to \$63,653	\$80 to \$48,329
03-02	DWWTWs (generators) <30 dry tons	441	Set amount	\$121	\$35	\$120	\$35	\$78	\$35
03-03	DWWTWs (generators) >= 30 dry tons	92	Set amount	\$804	\$35	\$800	\$35	\$420	\$35

PWMDs current annual Bio-solids fee is \$281. PWMD does not know what it gets for its current fee. PWMD uses a contractor to haul and dispose of the solids as well as the handling of the permitting (Parker AG). PWMD has had no issues to date. PWMD would not support any increase in its current Bio-solids fee. It is not clear how to compare PWMDs current Bio-solids fee of \$281 to Scenarios 1, 2 and 3.

RECLAIMED WATER

With New Services Without New Services

Scenario 1:

Scenario 2:

Scenario 3:

Reclaimed Water Comments:

Cat./ Sub-cat.	Cat/Sub-Cat Description	No. of Entities	Fee method	Scenario 1		Scenario 2		Scenario 3	
				<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>
05-01	0 to <1 MGD	8	Equation	\$855 + \$4,022 * Flow (MGD)	\$704 + \$3,018 * Flow (MGD)	\$850 + \$4,000 * Flow (MGD)	\$700 + \$3,000 * Flow (MGD)	\$550 + \$2,200 * Flow (MGD)	\$450 + \$1,900 * Flow (MGD)
			Range	\$855 to \$4,837	\$704 to \$3,692	\$850 to \$4,810	\$700 to \$3,670	\$550 to \$2,728	\$450 to \$2,331
05-02	>= 1 MGD	16	Equation	\$4,525 + \$377 * Flow (MGD)	\$3,621 + \$251 * Flow (MGD)	\$4,500 + \$375 * Flow (MGD)	\$3,600 + \$250 * Flow (MGD)	\$3,100 + \$200 * Flow (MGD)	\$2,500 + \$140 * Flow (MGD)
			Range	\$4,902 to \$15,835	\$3,872 to \$11,151	\$4,875 to \$15,750	\$3,850 to \$11,100	\$3,300 to \$9,100	\$2,640 to \$6,700

PWMD has no comments regarding Reclaimed Water.

SITE APPLICATIONS AND DESIGN REVIEW

Scenario 1: 1
 Scenario 2: 1
 Scenario 3: 3

	Scenario 1	Scenario 2	Scenario 3
Site applications and design review: percent change	35.1%	34.5%	9%

Site Application & Design Review Comments:

PWMD strongly disagrees (1) with Scenarios 1 and 2 and is neutral (3) regarding Scenario 3 (i.e., 9% increase).

PRELIMINARY EFFLUENT LIMITATIONS (PELs)

Low complexity service:

Medium/low complexity service:

Medium complexity service:

High to very high complexity service: 5

Service Type	Application Fee	Anticipated Actions
Low complexity	\$600 (application)	Groundwater PELs
Medium/low complexity	\$1,100 (application)	Groundwater PELs with analysis of ambient groundwater levels.
Medium complexity	\$3,800 (application)	Surface water PELs, DWWTWs minors.
High to very high complexity	\$3,800 with application, additional - refer to hourly rate below.	Surface water PELs, DWWTW majors. Surface water PELs, water treatment plant reverse osmosis discharge.

PELs Comments

PWMD is a DWWTW major (i.e., WWTP design capacity greater than 1 MGD), so PWMDs Service Type would be High to very high complexity service.

The current PEL services would cost PWMD \$6,300.

WQCD is proposing that PEL services for a DWWTW major be changed to \$3,800 with application, additional and additional

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is \$76/hour for environmental/physical scientist and \$90/hour for senior environmental/physical scientist.

\$6,300 - \$3,800 = \$2,500.

The number of hours that \$2,500 would cover would be:

\$2,500 \$76/hour = 33 hours; or

\$2,500 \$90/hour = 28 hours.

WQCDs proposal regarding PEL services for a DWWTW major should benefit wastewater treatment plant dischargers that discharge to a zero low flow stream, because the PELs would equal the water quality standards for the stream segment. It should take the WQCD only one or two hours to prepare a letter stating that the PELs equal the water quality standards. In this situation, the WQCDs proposed fee would be less than the current PEL services fee.

DISCHARGE PERMIT APPLICATIONS, APPLICATION SUPPLEMENTS AND PERMIT MODIFICATIONS

Applications and supplementals: fee is 50 percent of the annual fee. 1

Permit modifications: fee of 25 percent for minor amendments and 50 percent for major amendments. 1

Discharge Permit Comments:

WQCDs proposed fees are not reasonable (i.e., 50% of the annual fee for a permit application or permit application supplemental; 25% of the annual fee for a minor permit amendment; and 50% of the annual fee for a major permit amendment). For example, PWMD had to request a minor permit amendment to revise the PWMD discharge permit compliance schedule because the WQCC delayed the rulemaking hearing for the Arkansas River Basin, Regulation #32 from June 2012 to June 2013. There is no reason PWMD should have to pay 25% of the annual fee for this type of minor permit amendment.

A LA CARTE

Compliance assistance:

Administrative Action:

Low complexity service:

Medium/low complexity service:

Medium complexity service:

High to very high complexity service:

A la carte Comments:

PWMD has no comments regarding al la carte services.

Service Type	Application Fee	Example Actions
Compliance assistance	no fee	• Compliance assistance inspection or audit, upon request
Administrative action	\$80	• Permit transfer • NOX • Minor permit modification (removal of an out fall)
Low complexity service	\$600	• Regulatory exemption, confirmation of lagoon seepage rate
Medium/low complexity service	\$1,100	• Not anticipated at this time for PPU.
Medium complexity service	\$3,800	• Not anticipated at this time for PPU.
High to very high complexity service	\$3,800 submitted with application, additional - see hourly rates above	• Not anticipated at this time for PPU.

WORK GROUP RECOMMENDATIONS

1. Add accountability metrics to break information in to another level of detail by program area (e.g. biosolids, reuse, and pretreatment) to the WQCC annual report.

2. Ensure annual fees cover services including FAQs, application guidance, sample applications, permit requirement summaries/training (post-issuance consultation included), common failures/issues document and compliance forum at existing levels.

3. Include pre-issuance and/or pre-notice consultation in the annual fee packaged services.☐

4. Set a statutory fee cap for reclaimed water. Actual fees for program decided during triennial review.

5. For reclaimed water, fees are scaled on flow however an additional fee should be applied on a per user basis based on work load of compliance activities.☐

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6. For reclaimed water, new services fees for this subsector are set to provide funding for approximately 300 hours. The recommendation is to increase from 300 to 600 for other reclaimed water services such as low risk discharge policy development or more streamlined approval of new uses. Add additional resources to the division to increase timeliness of NOAs.

7. Consider active replenishment of fund balance as a viable scenario (Scenario 5).

Recommendation Comments

POLICY CONSIDERATIONS FOR OVERALL SUCCESS

In developing concepts for a fee structure, stakeholders identified the need to strike a balance between certainty and flexibility. A more certain structure, for example, one with dollars in statute has trades offs in the ability to evolve services and spend additional time on complex issues. A more flexible system can result in a higher rate of change in fee amounts. Accountability was also an important concept expressed by stakeholders.

1. Certainty: 1
2. Flexibility: 4
3. Accountability: 2
4. Rationale for setting fees: 3
5. Subsidies for permit holders: 5
6. What do you think is an appropriate frequency to review fees and fee structure? (Select one): 5 Years
If selected Other, please explain:
7. What do you think is the best manner to adjust for inflation?:

Statute v. Commission

There are a number of considerations when assessing the roles of the Water Quality Control Commission and statutory authority. A different solution may be appropriate for each sector.

1. Fees established by the Water Quality Control Commission. 1
2. Fees established in statute with a statutory cap and periodic adjustment made as necessary by the Water Quality Control Commission. 1
3. A la carte services and fees established and managed by the Water Quality Control Commission. 1
4. A la carte services and fees established in statute. 5
5. Fee formulas in statute. 5
6. Fees in statute with an inflation clause. 5
7. Fees in statute without an adjustment for inflation (current model). 3

Fee Comments

Legislators are elected and should be responsive to the public that they represent. Water Quality Control Commissioners are not elected and may not be responsive to the public that they represent.

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General Fund

There are different schools of thought for how general fund should be distributed in the Clean Water Program that range from no general fund to completely funded with general fund dollars.

1. The division has the discretion to spend as needed. 1
2. The only permit holders to receive general fund are those which involve governmental entities such as public utilities, local governments, or state agencies (e.g. Colorado Department of Transportation). 5
3. All permit holders receive some general funds but it should largely go to governmental entities. 1
4. All permit holders receive equal distribution based on a percentage. 1
5. All permit holders receive a percentage based on the department's discretion and other to be determined factors. 1
6. No permit holder general fund as it should be a completely cash funded program. 1
7. Only small public and private entities receive general fund. 1
8. Allocate general fund to program areas or permit activities with small numbers of permittees to keep fees reasonable. 1

General Fund Comments

Final Ratings

1. Small workgroup meetings were helpful in increasing my understanding of sector specific fees and having dialogue about how to improve the fee structure for the specific group. 5
2. Large group meetings were helpful in understanding the department's position and providing an avenue for large group discussion on cross cutting topics of interest. 5
3. Meeting materials increased my overall level of understanding about the history of Clean Water Program fees and their history, overall department and division funding and how the division manages clean water program permitted activities. 5
4. Facilitation was effective and objective. 2
5. This process was successful at creating a trusting, open atmosphere to discuss issues of interest. 3
6. This process was helpful in building professional relationships with peers that I did not have before this process. 3

Final Comments

The Facilitator generally helped the Workgroup stay on schedule which was a positive contribution by the Facilitator. However, there were times when the Facilitator cut stakeholders off before the stakeholders could make statements, finish their statements or ask questions. There were also times when the Facilitator claimed that some stakeholders had certain points of view when no stakeholders in attendance at any of the stakeholders meetings had ever expressed those points of view, which made it look like the Facilitator was expressing and emphasizing the WQCDs point of view.

J Fagan

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Did you attend the PPU workgroup meetings?: No

DOMESTIC WASTEWATER TREATMENT WORKS (DWWTWS)

Cat./ Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1		Scenario 2		Scenario 3	
DWWTW Scenario 1: 1	01-01	439	Range	Equation: \$804 + \$4525 * Flow (MGD)	\$804 to \$5,284	Equation: \$800 + \$4500 * Flow (MGD)	\$800 to \$5,255	Equation: \$670 + \$3500 * Flow (MGD)	\$670 to \$4,135
DWWTW Scenario 2: 1	01-02	41	Set amount	\$8,228		\$8,191		\$6,638	
DWWTW Scenario 3: 3	01-03	39	Set amount	\$15,415		\$15,346		\$12,437	
	01-04	10	Set amount	\$26,723		\$26,604		\$21,560	
	01-05	2	Set amount	\$30,830		\$30,693		\$24,874	
DWWTW Comments:	01-06	1	Set amount	\$33,910		\$33,760		\$27,359	

Fees for lagoons should be less than for mechanical for small systems. Minor upgrades to facilities like modifying outfall or changing aeration should be less than a full plant.

WATER TREATMENT PLANTS

Scenario	Cat./Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1	Scenario 2	Scenario 3
Scenario1: 1	02-01	Individual permits	10	Set amount	\$6,313	\$6,246	\$3,400
Scenario2: 1	02-02	General permits	94	Set amount	\$1,006	\$1,000	\$750

Water Treatment Plant Comments:

Why do water plants have to pay a fee just to operate? They are not taking much in services until they make a change

PRETREATMENT

Pretreatment Scenario	Cat./ Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1	Scenario 2	Scenario 3
Pretreatment Scenario 1:	04-01	Division approved POTW	2	Set amount added to permit annual fee	\$2,413	\$2,400	\$2,400
Pretreatment Scenario 2:	04-02	EPA approved and unapproved POTW <1 MGD	213	Set amount added to permit annual fee	\$151	\$150	\$130
Pretreatment Scenario 3:	04-03	EPA approved and unapproved POTW >= 1 MGD	94	Set amount added to permit annual fee	\$503	\$500	\$400
Pretreatment Comments:	04-04	Division-authorized Significant Industrial User	10	Set amount	\$1,006	\$1,000	\$700

BIOSOLIDS

Scenario	With New Services	Without New Services	Cat./ Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee method	Scenario 1		Scenario 2		Scenario 3	
							incl. new services	no new services	incl. new services	no new services	incl. new services	no new services
Scenario 1:	1	1	03-01	Beneficial reuse	92	Equation:	\$3.82 per dry ton	\$2.51 per dry ton	\$3.80 per dry ton	\$2.50 per dry ton	\$2.70 per dry ton	\$2.05 per dry ton
Scenario 2:	1	1				Range	\$80 to \$90,057	\$80 to \$59,173	\$80 to \$89,585	\$80 to \$58,938	\$80 to \$63,653	\$80 to \$48,329
Scenario 3:	3	3	03-02	DWWTWS (generators) <30 dry tons	441	Set amount	\$121	\$35	\$120	\$35	\$78	\$35
			03-03	DWWTWS (generators) >= 30 dry tons	92	Set amount	\$804	\$35	\$800	\$35	\$420	\$35

Biosolids Comments:

How long does it take a process a permit? That should be the fee. it should not be load specific.

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RECLAIMED WATER

With New Services Without New Services

Scenario 1:

Scenario 2:

Scenario 3:

Reclaimed Water Comments:

N/A

Cat./ Sub-cat.	Cat/Sub-Cat Description	No. of Entities	Fee method	Scenario 1		Scenario 2		Scenario 3	
				<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>
05-01	0 to <1 MGD	8	Equation	\$855 + \$4,022 * Flow (MGD)	\$704 + \$3,018 * Flow (MGD)	\$850 + \$4,000 * Flow (MGD)	\$700 + \$3,000 * Flow (MGD)	\$550 + \$2,200 * Flow (MGD)	\$450 + \$1,900 * Flow (MGD)
			Range	\$855 to \$4,837	\$704 to \$3,692	\$850 to \$4,810	\$700 to \$3,670	\$550 to \$2,728	\$450 to \$2,331
05-02	>= 1 MGD	16	Equation	\$4,525 + \$377 * Flow (MGD)	\$3,621 + \$251 * Flow (MGD)	\$4,500 + \$375 * Flow (MGD)	\$3,600 + \$250 * Flow (MGD)	\$3,100 + \$200 * Flow (MGD)	\$2,500 + \$140 * Flow (MGD)
			Range	\$4,902 to \$15,835	\$3,872 to \$11,151	\$4,875 to \$15,750	\$3,850 to \$11,100	\$3,300 to \$9,100	\$2,640 to \$6,700

SITE APPLICATIONS AND DESIGN REVIEW

Scenario 1:

Scenario 2:

Scenario 3:

	Scenario 1	Scenario 2	Scenario 3
Site applications and design review: percent change	35.1%	34.5%	9%

Site Application & Design Review Comments:

Minor upgrades to facilities like modifying outfall or changing aeration should be less than a full plant and really should not be charged. Current charges for site ap mod's are outrageous for a small system. In one we did recently it would be about 5% of the construction cost.

PRELIMINARY EFFLUENT LIMITATIONS (PELs)

Low complexity service:

Medium/low complexity service:

Medium complexity service:

High to very high complexity service:

Service Type	Application Fee	Anticipated Actions
Low complexity	\$600 (application)	Groundwater PELs
Medium/low complexity	\$1,100 (application)	Groundwater PELs with analysis of ambient groundwater levels.
Medium complexity	\$3,800 (application)	Surface water PELs, DWWTWs minors.
High to very high complexity	\$3,800 with application, additional - refer to hourly rate below.	Surface water PELs, DWWTW majors. Surface water PELs, water treatment plant reverse osmosis discharge.

PELs Comments

The requirements for PEL's even when the plant has PEL's and is only modifying operations slightly is not warranted.

DISCHARGE PERMIT APPLICATIONS, APPLICATION SUPPLEMENTS AND PERMIT MODIFICATIONS

Applications and supplementals: fee is 50 percent of the annual fee.

Permit modifications: fee of 25 percent for minor amendments and 50 percent for major amendments.

Discharge Permit Comments:

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A LA CARTE

- Compliance assistance: 5
Administrative Action: 3
Low complexity service: 1
Medium/low complexity service: 2
Medium complexity service:
High to very high complexity service:

Service Type	Application Fee	Example Actions
Compliance assistance	no fee	• Compliance assistance inspection or audit, upon request
Administrative action	\$80	• Permit transfer • NOX • Minor permit modification (removal of an outfall)
Low complexity service	\$600	• Regulatory exemption, confirmation of lagoon seepage rate
Medium/low complexity service	\$1,100	• Not anticipated at this time for PPU.
Medium complexity service	\$3,800	• Not anticipated at this time for PPU.
High to very high complexity service	\$3,800 submitted with application, additional - see hourly rates above	• Not anticipated at this time for PPU.

A la carte Comments:

This should be paid for by the public.

WORK GROUP RECOMMENDATIONS

1. Add accountability metrics to break information in to another level of detail by program area (e.g. biosolids, reuse, and pretreatment) to the WQCC annual report. 4
2. Ensure annual fees cover services including FAQs, application guidance, sample applications, permit requirement summaries/training (post-issuance consultation included), common failures/issues document and compliance forum at existing levels. 2
3. Include pre-issuance and/or pre-notice consultation in the annual fee packaged services. 1
4. Set a statutory fee cap for reclaimed water. Actual fees for program decided during triennial review. 3
5. For reclaimed water, fees are scaled on flow however an additional fee should be applied on a per user basis based on work load of compliance activities. 2
6. For reclaimed water, new services fees for this subsector are set to provide funding for approximately 300 hours. The recommendation is to increase from 300 to 600 for other reclaimed water services such as low risk discharge policy development or more streamlined approval of new uses. Add additional resources to the division to increase timeliness of NOAs. 2
7. Consider active replenishment of fund balance as a viable scenario (Scenario 5).

Recommendation Comments

POLICY CONSIDERATIONS FOR OVERALL SUCCESS

In developing concepts for a fee structure, stakeholders identified the need to strike a balance between certainty and flexibility. A more certain structure, for example, one with dollars in statute has trades offs in the ability to evolve services and spend additional time on complex issues. A more flexible system can result in a higher rate of change in fee amounts. Accountability was also an important concept expressed by stakeholders.

1. Certainty: 3
2. Flexibility: 2
3. Accountability: 1
4. Rationale for setting fees: 2
5. Subsidies for permit holders: 1

6. What do you think is an appropriate frequency to review fees and fee structure? (Select one):

3 Years

If selected Other, please explain:

J Fagan

Representative for: Town of Lake City (Group)

Phone: 9702408510

Email: jfagan@ccs84.com

Each number (from 1-5) next to a question denotes that person's level of agreement with that question. One denoted that they strongly disagreed and choosing five denoted they strongly agreed with the question. If there was no number, the person did not answer that question.

7. What do you think is the best manner to adjust for inflation?: denver boulder index, tho don't like it.

Statute v. Commission

There are a number of considerations when assessing the roles of the Water Quality Control Commission and statutory authority. A different solution may be appropriate for each sector.

- 1. Fees established by the Water Quality Control Commission. 2
- 2. Fees established in statute with a statutory cap and periodic adjustment made as necessary by the Water Quality Control Commission. 3
- 3. A la carte services and fees established and managed by the Water Quality Control Commission. 2
- 4. A la carte services and fees established in statute. 3
- 5. Fee formulas in statute. 3
- 6. Fees in statute with an inflation clause. 3
- 7. Fees in statute without an adjustment for inflation (current model). 4

Fee Comments

General Fund

There are different schools of thought for how general fund should be distributed in the Clean Water Program that range from no general fund to completely funded with general fund dollars.

- 1. The division has the discretion to spend as needed. 2
- 2. The only permit holders to receive general fund are those which involve governmental entities such as public utilities, local governments, or state agencies (e.g. Colorado Department of Transportation). 4
- 3. All permit holders receive some general funds but it should largely go to governmental entities. 2
- 4. All permit holders receive equal distribution based on a percentage. 2
- 5. All permit holders receive a percentage based on the department's discretion and other to be determined factors. 1
- 6. No permit holder general fund as it should be a completely cash funded program. 1
- 7. Only small public and private entities receive general fund. 2
- 8. Allocate general fund to program areas or permit activities with small numbers of permittees to keep fees reasonable. 4

General Fund Comments

most of the general funds should go to small public entities where the per gallon costs are highest.

J Fagan

Representative for: Town of Lake City (Group)

Phone: 9702408510

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Final Ratings

1. Small workgroup meetings were helpful in increasing my understanding of sector specific fees and having dialogue about how to improve the fee structure for the specific group.
2. Large group meetings were helpful in understanding the department's position and providing an avenue for large group discussion on cross cutting topics of interest.
3. Meeting materials increased my overall level of understanding about the history of CleanWater Program fees and their history, overall department and division funding and how the division manages clean water program permitted activities.
4. Facilitation was effective and objective.
5. This process was successful at creating a trusting, open atmosphere to discuss issues of interest.
6. This process was helpful in building professional relationships with peers that I did not have before this process.

Final Comments

Did not have time to attend the meetings but do appreciate all the outreach the division provided.

Matt Zoccali

Representative for: City of Fort Collins (Group)

Phone: 970-556-2556

Email: mzoccali@fcgov.com

Each number (from 1-5) next to a question denotes that person's level of agreement with that question. One denoted that they strongly disagreed and choosing five denoted they strongly agreed with the question. If there was no number, the person did not answer that question.

Did you attend the PPU workgroup meetings?: No

DOMESTIC WASTEWATER TREATMENT WORKS (DWWTWS)

DWWTW Scenario 1:

DWWTW Scenario 2:

DWWTW Scenario 3:

DWWTW Comments:

Cat./ Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1		Scenario 2		Scenario 3	
01-01	0 to <1 MGD	439	Range	Equation: \$804 + \$4525 * Flow (MGD)	\$804 to \$5,284	Equation: \$800 + \$4500 * Flow (MGD)	\$800 to \$5,255	Equation: \$670 + \$3500 * Flow (MGD)	\$670 to \$4,135
01-02	>= 1 MGD to 2.5 MGD	41	Set amount	\$8,228		\$8,191		\$6,638	
01-03	>= 2.5 MGD to 10 MGD	39	Set amount	\$15,415		\$15,346		\$12,437	
01-04	>= 10 MGD to 50 MGD	10	Set amount	\$26,723		\$26,604		\$21,560	
01-05	>= 50 MGD to 100 MGD	2	Set amount	\$30,830		\$30,693		\$24,874	
01-06	>= 100 MGD	1	Set amount	\$33,910		\$33,760		\$27,359	

While we are supportive of the WQCD having the funding it needs to provide excellent service, we are unclear about the practical differences between the three scenarios and thus we have chosen not to select our level of agreement with the three scenarios. It would be beneficial to have more information demonstrating the Division's funding shortfalls and how the three scenarios make the Division "whole" in three different ways.

WATER TREATMENT PLANTS

Scenario1: 3
 Scenario2: 2
 Scenario3: 4

Cat./Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1	Scenario 2	Scenario 3
02-01	Individual permits	10	Set amount	\$6,313	\$6,246	\$3,400
02-02	General permits	94	Set amount	\$1,006	\$1,000	\$750

Water Treatment Plant Comments:

In thinking about our level of agreement for the water treatment plant permitting scenarios, we considered sustainability, fairness, complexity, and dollar amounts.

PRETREATMENT

Pretreatment Scenario 1:
 Pretreatment Scenario 2:
 Pretreatment Scenario 3:
 Pretreatment Comments:

Cat./ Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1	Scenario 2	Scenario 3
04-01	Division approved POTW	2	Set amount added to permit annual fee	\$2,413	\$2,400	\$2,400
04-02	EPA approved and unapproved POTW <1 MGD	213	Set amount added to permit annual fee	\$151	\$150	\$130
04-03	EPA approved and unapproved POTW >= 1 MGD	94	Set amount added to permit annual fee	\$503	\$500	\$400
04-04	Division-authorized Significant Industrial User	10	Set amount	\$1,006	\$1,000	\$700

BIOSOLIDS

With New Services Without New Services

Scenario 1:
 Scenario 2:
 Scenario 3:

Cat./ Sub-cat.	Cat/Sub-Cat Description	No. of Entities	Fee method	Scenario 1		Scenario 2		Scenario 3	
				incl. new services	no new services	incl. new services	no new services	incl. new services	no new services
03-01	Beneficial reuse	92	Equation:	\$3.82 per dry ton	\$2.51 per dry ton	\$3.80 per dry ton	\$2.50 per dry ton	\$2.70 per dry ton	\$2.05 per dry ton
			Range	\$80 to \$90,057	\$80 to \$59,173	\$80 to \$89,585	\$80 to \$58,938	\$80 to \$63,653	\$80 to \$48,329
03-02	DWWTWs (generators) <30 dry tons	441	Set amount	\$121	\$35	\$120	\$35	\$78	\$35
03-03	DWWTWs (generators) >= 30 dry tons	92	Set amount	\$804	\$35	\$800	\$35	\$420	\$35

Biosolids Comments:

By its gradual disinvestment in the biosolids program, EPA seems to be nudging states toward delegation. We are supportive of the WQCD having the funding it needs to provide excellent service. While Scenario's 1 & 2 with new services seem to prepare Colorado for delegation, it is difficult to select a level of agreement because we are unclear about the practical

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differences between the three scenarios. It would be beneficial to have more information demonstrating the Division's funding shortfalls and how the three scenarios make the Division "whole" in three different ways.

Also, we support the idea of the Commission setting the fee in regulation at the level needed to fund a non-delegated program as mentioned in the first bullet above.

RECLAIMED WATER

With New Services Without New Services

Scenario 1:

Scenario 2:

Scenario 3:

Reclaimed Water Comments:

Cat./ Sub-cat.	Cat/Sub-Cat Description	No. of Entities	Fee method	Scenario 1		Scenario 2		Scenario 3	
				<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>
05-01	0 to <1 MGD	8	Equation	\$855 + \$4,022 * Flow (MGD)	\$704 + \$3,018 * Flow (MGD)	\$850 + \$4,000 * Flow (MGD)	\$700 + \$3,000 * Flow (MGD)	\$550 + \$2,200 * Flow (MGD)	\$450 + \$1,900 * Flow (MGD)
			Range	\$855 to \$4,837	\$704 to \$3,692	\$850 to \$4,810	\$700 to \$3,670	\$550 to \$2,728	\$450 to \$2,331
05-02	>= 1 MGD	16	Equation	\$4,525 + \$377 * Flow (MGD)	\$3,621 + \$251 * Flow (MGD)	\$4,500 + \$375 * Flow (MGD)	\$3,600 + \$250 * Flow (MGD)	\$3,100 + \$200 * Flow (MGD)	\$2,500 + \$140 * Flow (MGD)
			Range	\$4,902 to \$15,835	\$3,872 to \$11,151	\$4,875 to \$15,750	\$3,850 to \$11,100	\$3,300 to \$9,100	\$2,640 to \$6,700

SITE APPLICATIONS AND DESIGN REVIEW

Scenario 1: 4

Scenario 2: 4

Scenario 3: 2

	Scenario 1	Scenario 2	Scenario 3
Site applications and design review: percent change	35.1%	34.5%	9%

Site Application & Design Review Comments:

PRELIMINARY EFFLUENT LIMITATIONS (PELs)

Low complexity service:

Medium/low complexity service:

Medium complexity service:

High to very high complexity service:

PELs Comments

We support the fee for service structure, and that the proposed fees meet current staff and resource needs.

Since we are a surface water system, we did not select a "level of agreement" with the low or medium low complexity services.

Before we can select our level of agreement on the other two types of service, we need more information.

1. How are each of the complexity levels defined (ie--medium, very high)?
2. Are there a specific # of review hours expected for each complexity level?
3. Who makes the complexity level determination and when?
4. Is it possible for a project to start out as one complexity level (ie--medium) and change to another (ie--very high)?
5. If the PELs are deemed to be of high or very high complexity, what does the \$3,800 application fee cover?
6. If a discharger hires a 3rd party to calculate their PELs, is it possible for the \$3,800 application fee to be decreased?

DISCHARGE PERMIT APPLICATIONS, APPLICATION SUPPLEMENTS AND PERMIT MODIFICATIONS

Applications and supplementals: fee is 50 percent of the annual fee.

Permit modifications: fee of 25 percent for minor amendments and 50 percent for major amendments.

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Discharge Permit Comments:

A LA CARTE

Compliance assistance: 5

Administrative Action: 4

Low complexity service: 4

Medium/low complexity service:

Medium complexity service:

High to very high complexity service:

A la carte Comments:

Service Type	Application Fee	Example Actions
Compliance assistance	no fee	• Compliance assistance inspection or audit, upon request
Administrative action	\$80	• Permit transfer • NOX • Minor permit modification (removal of an outfall)
Low complexity service	\$600	• Regulatory exemption, confirmation of lagoon seepage rate
Medium/low complexity service	\$1,100	• Not anticipated at this time for PPU.
Medium complexity service	\$3,800	• Not anticipated at this time for PPU.
High to very high complexity service	\$3,800 submitted with application, additional - see hourly rates above	• Not anticipated at this time for PPU.

We are supportive of keeping compliance assistance as a no fee service, and supportive of paying a fee for the listed a la carte services.

WORK GROUP RECOMMENDATIONS

1. Add accountability metrics to break information in to another level of detail by program area (e.g. biosolids, reuse, and pretreatment) to the WQCC annual report.
2. Ensure annual fees cover services including FAQs, application guidance, sample applications, permit requirement summaries/training (post-issuance consultation included), common failures/issues document and compliance forum at existing levels.
3. Include pre-issuance and/or pre-notice consultation in the annual fee packaged services.☐
4. Set a statutory fee cap for reclaimed water. Actual fees for program decided during triennial review.
5. For reclaimed water, fees are scaled on flow however an additional fee should be applied on a per user basis based on work load of compliance activities.☐
6. For reclaimed water, new services fees for this subsector are set to provide funding for approximately 300 hours. The recommendation is to increase from 300 to 600 for other reclaimed water services such as low risk discharge policy development or more streamlined approval of new uses. Add additional resources to the division to increase timeliness of NOAs.
7. Consider active replenishment of fund balance as a viable scenario (Scenario 5).

Recommendation Comments

POLICY CONSIDERATIONS FOR OVERALL SUCCESS

Matt Zoccali

Representative for: City of Fort Collins (Group)

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In developing concepts for a fee structure, stakeholders identified the need to strike a balance between certainty and flexibility. A more certain structure, for example, one with dollars in statute has trades offs in the ability to evolve services and spend additional time on complex issues. A more flexible system can result in a higher rate of change in fee amounts. Accountability was also an important concept expressed by stakeholders.

1. Certainty:

2. Flexibility:

3. Accountability:

4. Rationale for setting fees:

5. Subsidies for permit holders:

6. What do you think is an appropriate frequency to review fees and fee structure? (Select one): 5 Years

If selected Other, please explain:

7. What do you think is the best manner to adjust for inflation?: Given that the expenses are mainly for labor rather than capital, it would be appropriate to adjust for inflation with the consumer price index.

Statute v. Commission

There are a number of considerations when assessing the roles of the Water Quality Control Commission and statutory authority. A different solution may be appropriate for each sector.

- 1. Fees established by the Water Quality Control Commission. 1
- 2. Fees established in statute with a statutory cap and periodic adjustment made as necessary by the Water Quality Control Commission. 5
- 3. A la carte services and fees established and managed by the Water Quality Control Commission. 3
- 4. A la carte services and fees established in statute. 4
- 5. Fee formulas in statute. 4
- 6. Fees in statute with an inflation clause. 4
- 7. Fees in statute without an adjustment for inflation (current model). 2

Fee Comments

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General Fund

There are different schools of thought for how general fund should be distributed in the Clean Water Program that range from no general fund to completely funded with general fund dollars.

1. The division has the discretion to spend as needed.
2. The only permit holders to receive general fund are those which involve governmental entities such as public utilities, local governments, or state agencies (e.g. Colorado Department of Transportation).
3. All permit holders receive some general funds but it should largely go to governmental entities.
4. All permit holders receive equal distribution based on a percentage.
5. All permit holders receive a percentage based on the department's discretion and other to be determined factors.
6. No permit holder general fund as it should be a completely cash funded program.
7. Only small public and private entities receive general fund.
8. Allocate general fund to program areas or permit activities with small numbers of permittees to keep fees reasonable.

General Fund Comments

Final Ratings

1. Small workgroup meetings were helpful in increasing my understanding of sector specific fees and having dialogue about how to improve the fee structure for the specific group.
2. Large group meetings were helpful in understanding the department's position and providing an avenue for large group discussion on cross cutting topics of interest.
3. Meeting materials increased my overall level of understanding about the history of Clean Water Program fees and their history, overall department and division funding and how the division manages clean water program permitted activities.
4. Facilitation was effective and objective.
5. This process was successful at creating a trusting, open atmosphere to discuss issues of interest.
6. This process was helpful in building professional relationships with peers that I did not have before this process.

Final Comments

Thomas Dingeman

Representative for: City of Greeley

Phone: 970.350.9365

Email: tom.dingeman@greeleygov.com

Each number (from 1-5) next to a question denotes that person's level of agreement with that question. One denoted that they strongly disagreed and choosing five denoted they strongly agreed with the question. If there was no number, the person did not answer that question.

Did you attend the PPU workgroup meetings?: No

DOMESTIC WASTEWATER TREATMENT WORKS (DWWTWS)

Cat./ Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1		Scenario 2		Scenario 3		
DWWTW Scenario 1: 1	01-01	0 to <1 MGD	439	Range	Equation: \$804 + \$4525 * Flow (MGD)	\$804 to \$5,284	Equation: \$800 + \$4500 * Flow (MGD)	\$800 to \$5,255	Equation: \$670 + \$3500 * Flow (MGD)	\$670 to \$4,135
DWWTW Scenario 2: 1	01-02	>= 1 MGD to 2.5 MGD	41	Set amount	\$8,228		\$8,191		\$6,638	
DWWTW Scenario 3: 4	01-03	>= 2.5 MGD to 10 MGD	39	Set amount	\$15,415		\$15,346		\$12,437	
	01-04	>= 10 MGD to 50 MGD	10	Set amount	\$26,723		\$26,604		\$21,560	
	01-05	>= 50 MGD to 100 MGD	2	Set amount	\$30,830		\$30,693		\$24,874	
DWWTW Comments:	01-06	>= 100 MGD	1	Set amount	\$33,910		\$33,760		\$27,359	

These scenarios play havoc with utilities who operate on a two-year budget cycle especially when the budgets have already been prepared and approved.

WATER TREATMENT PLANTS

Scenario:	Cat./Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1	Scenario 2	Scenario 3
Scenario1:	02-01	Individual permits	10	Set amount	\$6,313	\$6,246	\$3,400
Scenario2:	02-02	General permits	94	Set amount	\$1,006	\$1,000	\$750

Water Treatment Plant Comments:

PRETREATMENT

Pretreatment Scenario:	Cat./ Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1	Scenario 2	Scenario 3
Pretreatment Scenario 1: 2	04-01	Division approved POTW	2	Set amount added to permit annual fee	\$2,413	\$2,400	\$2,400
Pretreatment Scenario 2: 2	04-02	EPA approved and unapproved POTW <1 MGD	213	Set amount added to permit annual fee	\$151	\$150	\$130
Pretreatment Scenario 3: 4	04-03	EPA approved and unapproved POTW >= 1 MGD	94	Set amount added to permit annual fee	\$503	\$500	\$400
Pretreatment Comments:	04-04	Division-authorized Significant Industrial User	10	Set amount	\$1,006	\$1,000	\$700

Scenarios are higher than what has been budgeted for, but proposed increased fees probably can be met.

BIOSOLIDS

	With New Services	Without New Services	Cat./ Sub-cat.	Cat/Sub-Cat Description	No. of Entities	Fee method	Scenario 1		Scenario 2		Scenario 3	
							incl. new services	no new services	incl. new services	no new services	incl. new services	no new services
Scenario 1:	4	4	03-01	Beneficial reuse	92	Equation:	\$3.82 per dry ton	\$2.51 per dry ton	\$3.80 per dry ton	\$2.50 per dry ton	\$2.70 per dry ton	\$2.05 per dry ton
Scenario 2:	4	4				Range	\$80 to \$90,057	\$80 to \$59,173	\$80 to \$89,585	\$80 to \$58,938	\$80 to \$63,653	\$80 to \$48,329
Scenario 3:	5	5	03-02	DWWTWS (generators) <30 dry tons	441	Set amount	\$121	\$35	\$120	\$35	\$78	\$35
Biosolids Comments:			03-03	DWWTWS (generators) >= 30 dry tons	92	Set amount	\$804	\$35	\$800	\$35	\$420	\$35

I would be in favor of delegation and the higher fees necessary to run the program.

Thomas Dingeman

Representative for: City of Greeley

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RECLAIMED WATER

With New Services Without New Services

Scenario 1:

Scenario 2:

Scenario 3:

Reclaimed Water Comments:

Cat./ Sub-cat.	Cat/Sub-Cat Description	No. of Entities	Fee method	Scenario 1		Scenario 2		Scenario 3	
				<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>
05-01	0 to <1 MGD	8	Equation	\$855 + \$4,022 * Flow (MGD)	\$704 + \$3,018 * Flow (MGD)	\$850 + \$4,000 * Flow (MGD)	\$700 + \$3,000 * Flow (MGD)	\$550 + \$2,200 * Flow (MGD)	\$450 + \$1,900 * Flow (MGD)
			Range	\$855 to \$4,837	\$704 to \$3,692	\$850 to \$4,810	\$700 to \$3,670	\$550 to \$2,728	\$450 to \$2,331
05-02	>= 1 MGD	16	Equation	\$4,525 + \$377 * Flow (MGD)	\$3,621 + \$251 * Flow (MGD)	\$4,500 + \$375 * Flow (MGD)	\$3,600 + \$250 * Flow (MGD)	\$3,100 + \$200 * Flow (MGD)	\$2,500 + \$140 * Flow (MGD)
			Range	\$4,902 to \$15,835	\$3,872 to \$11,151	\$4,875 to \$15,750	\$3,850 to \$11,100	\$3,300 to \$9,100	\$2,640 to \$6,700

SITE APPLICATIONS AND DESIGN REVIEW

Scenario 1:

Scenario 2:

Scenario 3:

	Scenario 1	Scenario 2	Scenario 3
Site applications and design review: percent change	35.1%	34.5%	9%

Site Application & Design Review Comments:

Pretty hefty increases especially when you already have the next two year's of operating budgets established and approved without these proposed percent changes added in.

PRELIMINARY EFFLUENT LIMITATIONS (PELs)

Low complexity service:

Medium/low complexity service:

Medium complexity service:

High to very high complexity service:

PELs Comments

High fees for many utilities especially when budgets have already been established and approved.

Service Type	Application Fee	Anticipated Actions
Low complexity	\$600 (application)	Groundwater PELs
Medium/low complexity	\$1,100 (application)	Groundwater PELs with analysis of ambient groundwater levels.
Medium complexity	\$3,800 (application)	Surface water PELs, DWWTWs minors.
High to very high complexity	\$3,800 with application, additional - refer to hourly rate below.	Surface water PELs, DWWTW majors. Surface water PELs, water treatment plant reverse osmosis discharge.

DISCHARGE PERMIT APPLICATIONS, APPLICATION SUPPLEMENTS AND PERMIT MODIFICATIONS

Applications and supplementals: fee is 50 percent of the annual fee.

Permit modifications: fee of 25 percent for minor amendments and 50 percent for major amendments.

Discharge Permit Comments:

Huge impact to established budgets.

A LA CARTE

Compliance assistance:

Administrative Action:

Low complexity service:

Medium/low complexity service:

Medium complexity service:

High to very high complexity service:

A la carte Comments:

Service Type	Application Fee	Example Actions
Compliance assistance	no fee	• Compliance assistance inspection or audit, upon request
Administrative action	\$80	• Permit transfer • NOX • Minor permit modification (removal of an out fall)
Low complexity service	\$600	• Regulatory exemption, confirmation of lagoon seepage rate
Medium/low complexity service	\$1,100	• Not anticipated at this time for PPU.
Medium complexity service	\$3,800	• Not anticipated at this time for PPU.
High to very high complexity service	\$3,800 submitted with application, additional - see hourly rates above	• Not anticipated at this time for PPU.

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WORK GROUP RECOMMENDATIONS

1. Add accountability metrics to break information in to another level of detail by program area (e.g. biosolids, reuse, and pretreatment) to the WQCC annual report. 5
2. Ensure annual fees cover services including FAQs, application guidance, sample applications, permit requirement summaries/training (post-issuance consultation included), common failures/issues document and compliance forum at existing levels. 4
3. Include pre-issuance and/or pre-notice consultation in the annual fee packaged services. 4
4. Set a statutory fee cap for reclaimed water. Actual fees for program decided during triennial review. 3
5. For reclaimed water, fees are scaled on flow however an additional fee should be applied on a per user basis based on work load of compliance activities. 3
6. For reclaimed water, new services fees for this subsector are set to provide funding for approximately 300 hours. The recommendation is to increase from 300 to 600 for other reclaimed water services such as low risk discharge policy development or more streamlined approval of new uses. Add additional resources to the division to increase timeliness of NOAs. 3
7. Consider active replenishment of fund balance as a viable scenario (Scenario 5). 3

Recommendation Comments

POLICY CONSIDERATIONS FOR OVERALL SUCCESS

In developing concepts for a fee structure, stakeholders identified the need to strike a balance between certainty and flexibility. A more certain structure, for example, one with dollars in statute has trades offs in the ability to evolve services and spend additional time on complex issues. A more flexible system can result in a higher rate of change in fee amounts. Accountability was also an important concept expressed by stakeholders.

1. Certainty: 2
 2. Flexibility: 4
 3. Accountability: 3
 4. Rationale for setting fees: 1
 5. Subsidies for permit holders: 5
 6. What do you think is an appropriate frequency to review fees and fee structure? (Select one): 3 Years
- If selected Other, please explain:
7. What do you think is the best manner to adjust for inflation?:

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Fee Comments

General Fund

There are different schools of thought for how general fund should be distributed in the Clean Water Program that range from no general fund to completely funded with general fund dollars.

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2. The only permit holders to receive general fund are those which involve governmental entities such as public utilities, local governments, or state agencies (e.g. Colorado Department of Transportation). 4
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General Fund Comments

Final Ratings

1. Small workgroup meetings were helpful in increasing my understanding of sector specific fees and having dialogue about how to improve the fee structure for the specific group. 3
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Did you attend the PPU workgroup meetings?: No

DOMESTIC WASTEWATER TREATMENT WORKS (DWWTWS)

Cat./ Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1		Scenario 2		Scenario 3	
DWWTW Scenario 1: 1	01-01	0 to <1 MGD	439	Range	Equation: \$804 + \$4525 * Flow (MGD) \$804 to \$5,284	Equation: \$800 + \$4500 * Flow (MGD) \$800 to \$5,255	Equation: \$670 + \$3500 * Flow (MGD) \$670 to \$4,135		
DWWTW Scenario 2: 1	01-02	>= 1 MGD to 2.5 MGD	41	Set amount	\$8,228	\$8,191	\$6,638		
DWWTW Scenario 3: 5	01-03	>= 2.5 MGD to 10 MGD	39	Set amount	\$15,415	\$15,346	\$12,437		
	01-04	>= 10 MGD to 50 MGD	10	Set amount	\$26,723	\$26,604	\$21,560		
	01-05	>= 50 MGD to 100 MGD	2	Set amount	\$30,830	\$30,693	\$24,874		
DWWTW Comments:	01-06	>= 100 MGD	1	Set amount	\$33,910	\$33,760	\$27,359		

WATER TREATMENT PLANTS

Cat./Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1	Scenario 2	Scenario 3	
Scenario1: 1	02-01	Individual permits	10	Set amount	\$6,313	\$6,246	\$3,400
Scenario2: 1	02-02	General permits	94	Set amount	\$1,006	\$1,000	\$750
Scenario3: 5							

Water Treatment Plant Comments:

PRETREATMENT

Cat./ Sub-Cat.	Cat/Sub-Cat. Description	No. of Entities	Fee Methodology	Scenario 1	Scenario 2	Scenario 3	
Pretreatment Scenario 1: 1	04-01	Division approved POTW	2	Set amount added to permit annual fee	\$2,413	\$2,400	\$2,400
Pretreatment Scenario 2: 1	04-02	EPA approved and unapproved POTW <1 MGD	213	Set amount added to permit annual fee	\$151	\$150	\$130
Pretreatment Scenario 3: 5	04-03	EPA approved and unapproved POTW >= 1 MGD	94	Set amount added to permit annual fee	\$503	\$500	\$400
Pretreatment Comments:	04-04	Division-authorized Significant Industrial User	10	Set amount	\$1,006	\$1,000	\$700

BIOSOLIDS

	With New Services	Without New Services	Cat./ Sub-cat.	Cat/Sub-Cat Description	No. of Entities	Fee method	Scenario 1		Scenario 2		Scenario 3	
							<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>
Scenario 1: 1	1	1	03-01	Beneficial reuse	92	Equation:	\$3.82 per dry ton	\$2.51 per dry ton	\$3.80 per dry ton	\$2.50 per dry ton	\$2.70 per dry ton	\$2.05 per dry ton
Scenario 2: 1	1	1				Range	\$80 to \$90,057	\$80 to \$59,173	\$80 to \$89,585	\$80 to \$58,938	\$80 to \$63,653	\$80 to \$48,329
Scenario 3: 5	5	5	03-02	DWWTWs (generators) <30 dry tons	441	Set amount	\$121	\$35	\$120	\$35	\$78	\$35
Biosolids Comments:			03-03	DWWTWs (generators) >= 30 dry tons	92	Set amount	\$804	\$35	\$800	\$35	\$420	\$35

RECLAIMED WATER

	With New Services	Without New Services	Cat./ Sub-cat.	Cat/Sub-Cat Description	No. of Entities	Fee method	Scenario 1		Scenario 2		Scenario 3	
							<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>	<i>incl. new services</i>	<i>no new services</i>
Scenario 1: 3	3	3	05-01	0 to <1 MGD	8	Equation	\$855 + \$4,022 * Flow (MGD)	\$704 + \$3,018 * Flow (MGD)	\$850 + \$4,000 * Flow (MGD)	\$700 + \$3,000 * Flow (MGD)	\$550 + \$2,200 * Flow (MGD)	\$450 + \$1,900 * Flow (MGD)
Scenario 2: 3	3	3				Range	\$855 to \$4,837	\$704 to \$3,692	\$850 to \$4,810	\$700 to \$3,670	\$550 to \$2,728	\$450 to \$2,331
Scenario 3: 3	3	3	05-02	>= 1 MGD	16	Equation	\$4,525 + \$377 * Flow (MGD)	\$3,621 + \$251 * Flow (MGD)	\$4,500 + \$375 * Flow (MGD)	\$3,600 + \$250 * Flow (MGD)	\$3,100 + \$200 * Flow (MGD)	\$2,500 + \$140 * Flow (MGD)
Reclaimed Water Comments:						Range	\$4,902 to \$15,835	\$3,872 to \$11,151	\$4,875 to \$15,750	\$3,850 to \$11,100	\$3,300 to \$9,100	\$2,640 to \$6,700

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SITE APPLICATIONS AND DESIGN REVIEW

Scenario 1:	1		Scenario 1	Scenario 2	Scenario 3
Scenario 2:	1	Site applications and design review: percent change	35.1%	34.5%	9%

Scenario 3: 5

Site Application & Design Review Comments:

PRELIMINARY EFFLUENT LIMITATIONS (PELs)

Low complexity service:	3		Service Type	Application Fee	Anticipated Actions
Medium/low complexity service:	3		Low complexity	\$600 (application)	Groundwater PELs
Medium complexity service:	3		Medium/low complexity	\$1,100 (application)	Groundwater PELs with analysis of ambient groundwater levels.
High to very high complexity service:	3		Medium complexity	\$3,800 (application)	Surface water PELs, DWWTWs minors.
PELs Comments			High to very high complexity	\$3,800 with application, additional - refer to hourly rate below.	Surface water PELs, DWWTW majors. Surface water PELs, water treatment plant reverse osmosis discharge.

DISCHARGE PERMIT APPLICATIONS, APPLICATION SUPPLEMENTS AND PERMIT MODIFICATIONS

Applications and supplementals: fee is 50 percent of the annual fee. 3

Permit modifications: fee of 25 percent for minor amendments and 50 percent for major amendments. 3

Discharge Permit Comments:

A LA CARTE

Compliance assistance:	3		Service Type	Application Fee	Example Actions
Administrative Action:	3		Compliance assistance	no fee	• Compliance assistance inspection or audit, upon request
Low complexity service:	3		Administrative action	\$80	• Permit transfer • NOX • Minor permit modification (removal of an outfall)
Medium/low complexity service:	3		Low complexity service	\$600	• Regulatory exemption, confirmation of lagoon seepage rate
Medium complexity service:	3		Medium/low complexity service	\$1,100	• Not anticipated at this time for PPU.
High to very high complexity service:	3		Medium complexity service	\$3,800	• Not anticipated at this time for PPU.
A la carte Comments:			High to very high complexity service	\$3,800 submitted with application, additional - see hourly rates above	• Not anticipated at this time for PPU.

WORK GROUP RECOMMENDATIONS

1. Add accountability metrics to break information in to another level of detail by program area (e.g. biosolids, reuse, and pretreatment) to the WQCC annual report. 3
2. Ensure annual fees cover services including FAQs, application guidance, sample applications, permit requirement summaries/training (post-issuance consultation included), common failures/issues document and compliance forum at existing levels. 3
3. Include pre-issuance and/or pre-notice consultation in the annual fee packaged services. 3
4. Set a statutory fee cap for reclaimed water. Actual fees for program decided during triennial review. 3
5. For reclaimed water, fees are scaled on flow however an additional fee should be applied on a per user basis based on work load of compliance activities. 3

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- 6. For reclaimed water, new services fees for this subsector are set to provide funding for approximately 300 hours. The recommendation is to increase from 300 to 600 for other reclaimed water services such as low risk discharge policy development or more streamlined approval of new uses. Add additional resources to the division to increase timeliness of NOAs. 3
- 7. Consider active replenishment of fund balance as a viable scenario (Scenario 5). 3

Recommendation Comments

POLICY CONSIDERATIONS FOR OVERALL SUCCESS

In developing concepts for a fee structure, stakeholders identified the need to strike a balance between certainty and flexibility. A more certain structure, for example, one with dollars in statute has trades offs in the ability to evolve services and spend additional time on complex issues. A more flexible system can result in a higher rate of change in fee amounts. Accountability was also an important concept expressed by stakeholders.

- 1. Certainty: 2
- 2. Flexibility: 3
- 3. Accountability: 1
- 4. Rationale for setting fees: 4
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