



WQCD Clean Water Fee Structure Feedback Summary Public and Private Utilities

This is an overview of feedback received for the public and private utilities workgroup. A similar summary will be published for each workgroup based on individual and group submissions. Comments and levels of agreement for large group policy considerations including statute vs. commission, general fund and the overall process will be shared in a separate full group summary.

RESPONDENT SUMMARY

Total number of respondents: 15

See table below for summary. (Note: some stakeholders represent multiple "Groups")

Respondents who attended meetings: 66%

Respondent types

Stakeholder Group	Approximate Number of Stakeholders	Number of Respondents
Water Quality Planning Associations	4	1
DWWTWs - POTWs	300	10
DWWTWs - Non-POTWs (private entities, other governmental agencies)	225	1
WTPs	100	6
Reclaimed Water Treaters	24	4
Private contractors and consultants	n/a	2
Private citizen	0	1



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Workgroup Recommendations

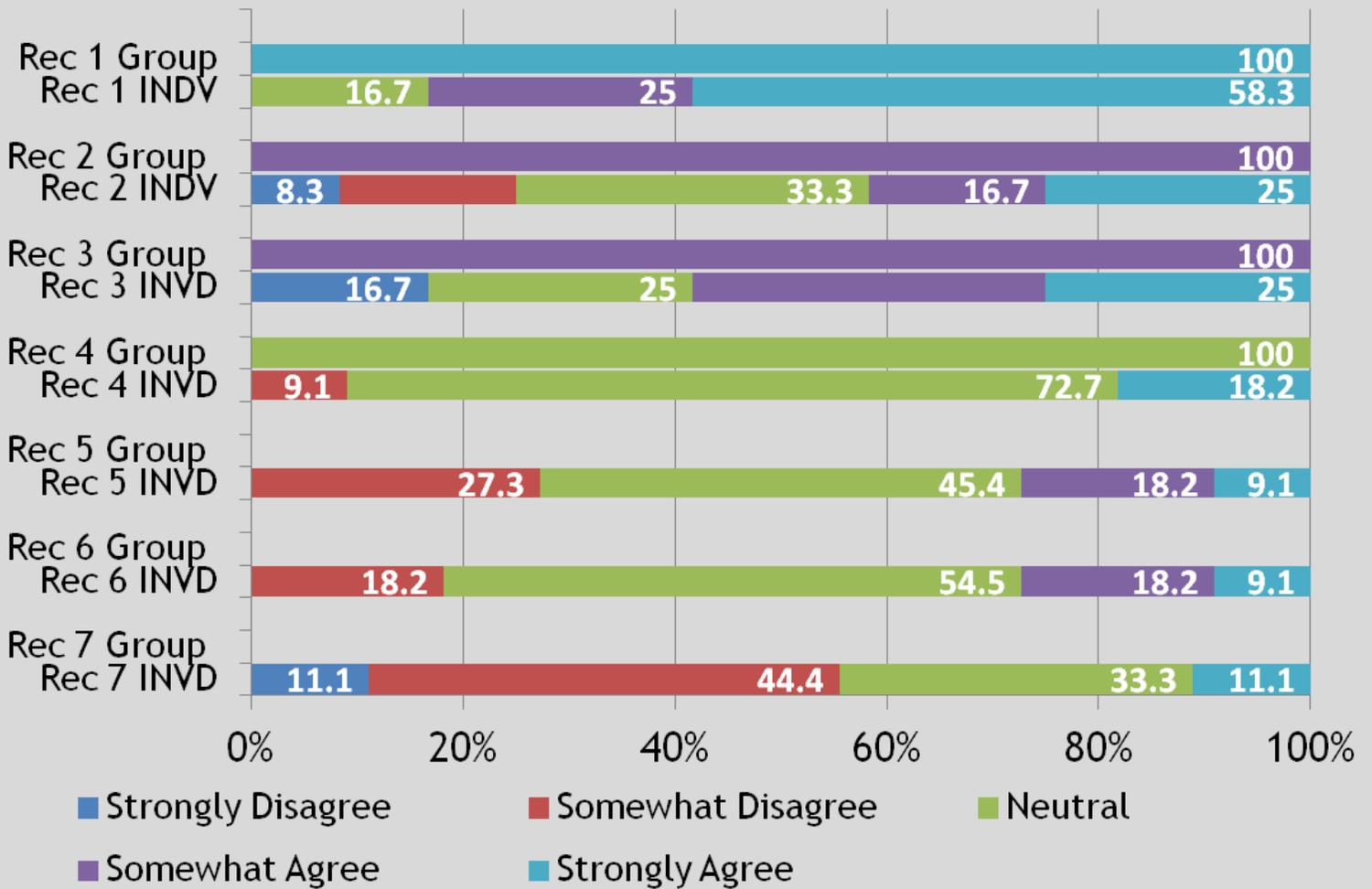
Each workgroup created a set of recommendations. Below is a summary on the average level of agreement (or disagreement) with each of the recommendations. The bar graphs following the summary identifies percents for the actual Likert rating and differentiate by group vs. individual.

Recommendation (12 of 15 respondents completed all or a portion of this section)	Outcome
1. Add accountability metrics to the WQCC annual report.	10 indicated agreement , 0 indicated disagreement 2 were neutral.
2. Ensure annual fees cover services including FAQs. Application guidance, sample applications, permit requirement summaries/training, common failures/issues document and compliance forum at existing levels.	6 indicated agreement, 2 indicated disagreement, 4 were neutral.
3. Include pre-issuance and/or pre-notice consultation in the annual fee packaged services.	8 indicated agreement , 1 indicated disagreement, 3 were neutral.
4. Set a statutory fee cap for reclaimed water. Actual fees for program decided during triennial review.	2 indicated agreement , 1 indicated disagreement, 8 were neutral.
5. For reclaimed water, fees are scaled on flow; however, an additional fee should be applied on a per user basis based upon work load of compliance activities.	3 indicated agreement, 2 indicated disagreement, 5 were neutral.
6. For reclaimed water, new service 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 users. Add additional resources to the division to increase timeliness of NOAs.	3 indicated agreement , 1 indicated disagreement, 4 were neutral.
7. Consider active replenishment of fund balance as a viable scenario (Scenario 5)	1 indicated agreement , 5 indicated disagreement, 3 were neutral.



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Level of agreement (%) on workgroup recommendations
(n INDV=14 n Group=1)





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Proposed fee structure

This sector includes current statutory categories: 6, 7, 20, 21, 22, 30, 31, 32, 33, 34, 35, 40, 41, 42, 44, 45, 46 and all associated subcategories. This is a total of 223 categories and subcategories. To simplify, the new proposal has only 59 categories and subcategories. For example, instead of having specific subcategories for how water is treated (lagoon or mechanical), the department simplified the categories based on flow. Permittee types included in this sector and fee proposal are Domestic Wastewater Treatment Works (DWWTW), Water Treatment Plants (WTPs), Biosolids, Pretreatment, and Reclaimed Water.

Domestic wastewater treatment works (DWWTWS) (13 of 15 respondents)

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	

- 9 of the respondents indicated agreement with at least one of the three scenarios.
- 11 of the respondents indicated a preference among the three scenarios.
 - ◊ 8 of those preferred scenario 3.
 - ◊ 2 preferred scenario 2.
 - ◊ 1 preferred scenario 1.



Water treatment plants (12 of 15 respondents)

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

- 9 of the respondents indicated agreement with at least one of the three scenarios.
- 7 of the respondents indicated a preference among the three scenarios.
 - ◊ 4 of those preferred scenario 3.
 - ◊ 2 preferred scenario 2.
 - ◊ 1 preferred scenario 1.
- 1 respondent was neutral for all scenario.





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Pretreatment (10 of 15 respondents)

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

- 7 respondents were POTWs and 5 of those 7 indicated agreement with at least one of the three scenarios.
- 4 of the respondents indicated a preference among the scenarios.
 - ◊ 2 preferred scenario 2.
 - ◊ 2 preferred scenario 3.
- 2 respondents were neutral for all scenarios.



Biosolids (13 of 15 respondents)

- Based on current services (without delegation).
- New services (with delegation). The fee scenario for delegation does not include septage or incineration, so it assumes a request for partial delegation from EPA.

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

- 5 of the respondents are POTWs that generate biosolids, and 4 of those beneficially reuse them.
 - ◊ 3 of those 5 respondents did not identify a preference regarding new services (i.e. they rated scenarios with and without new services the same).
 - ◊ 1 preferred new services.
 - ◊ 1 preferred no new services.
- The 2 POTW respondents that do not beneficially reuse biosolids did not identify a preference regarding new services.
- 8 respondents indicated agreement with at least one of the three scenarios.
- 9 respondents indicated a preference among scenarios.
 - ◊ 4 of those preferred scenario 3.
 - ◊ 3 preferred scenario 1.
 - ◊ 2 preferred scenario 2.
- 2 respondents were neutral on all scenarios.





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Reclaimed water (7 of 15 respondents)

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

- 3 of the respondents are reclaimed water treaters.
 - ◊ 1 did not identify a preference regarding new services.
 - ◊ 1 preferred new services.
 - ◊ 1 preferred no new services.
- 4 respondents indicated agreement with at least one of the three scenarios.
- 2 respondents were neutral on all scenarios.



Site applications and design review (14 of 15 respondents)

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

- 7 of the 13 respondents indicated agreement with at least one of the three scenarios.
- 10 of the 13 indicated a preference among the three scenarios.
 - ◊ 9 of those preferred scenario 3.
 - ◊ 1 preferred scenario 2.
- 1 respondent was neutral on all scenarios.



Preliminary effluent limitations (PELs) (14 of 15 respondents)

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.

- 10 of the 13 respondents indicated agreement with the proposed fees.
- 1 respondent was neutral on all scenarios.





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Discharge permit applications, application supplements and permit modifications (13 of 15 respondents)

- For applications, supplementals and permit modifications:
 - ◇ 2 of the respondents indicated agreement with the proposed fees
 - ◇ 6 were neutral
 - ◇ 5 indicated disagreement.
- Respondents commented that it was not clear whether the application fee would or would not apply to permit renewals. The application fee would only apply to new sources, and not to renewal permits.

A la carte (14 of 15 respondents)

- 7 of respondents indicated agreement with some or all of the proposed fees.
- 6 of the respondents were neutral for all of the fees.
- The highest level of agreement was with the compliance, administrative action, and low complexity a la carte fees.

Additional themes regarding the sector proposals

- Most respondents indicated some level of agreement with at least one of the three fee structure scenarios for each permit type.
- There was an overall low response rate from participants in the stakeholder process and from the permitted universe. In general, there was not a clear indication of preference among the fee structure scenarios and regarding new services for biosolids or reuse.
- Several respondents indicated that more detail should be provided on what constitutes a major vs. minor permit amendment.
- Several respondents recommended a cap should be considered for some areas, such as a la carte services and PELs.
- The division did not provide enough information to make a case for fee increases.
- For the recommendation to set a statutory fee cap for reclaimed water with the actual fees set by the WQCC (#4) - Three of the respondents were reclaimed water treaters that would be subject to the proposed fees. None of the reclaimed water treaters indicated disagreement with the proposal, 2 indicated strong agreement, and one was neutral.