

# IPDES Program Analysis



**IDAHO DEQ**  
**JANUARY 23, 2015**

# Outline of the presentation



- Purpose and scope of program analysis
- 3 main components of IPDES program
  - Program Management
  - Permitting
  - Compliance, Inspection, and Enforcement
- Conclusions

# Purpose & Scope



- To produce a reasonable estimate of overall resource needs,
- To validate model results using current realm of permitting program,
- To document model inputs and assumptions
- To update previous estimates and reports,
- To provide detailed information regarding resource needs,
- To describe possible ways resources may be utilized.

# Program Management



- **RULES**
- **GUIDANCE**
- **POLICY INTERPRETATION**
  - **DATA MANAGEMENT**
  - **FEE ADMINISTRATION**

# Program Management



<b>Activity</b>	<b>Model Estimation (hours)</b>	<b>Projected Workload (hours)</b>
<b>Program Management</b>		
<b>Program manager</b>	—	1,784
<b>Permits lead</b>	—	1,249
<b>CIE lead</b>	—	1,249
<b><i>Subtotal</i></b>	<b>6,000</b>	<b>4,282</b>

# Program Management



Activity	Model Estimation (hours)	Projected Workload (hours)
<b>Rules and Guidance Development</b>		
Rules and guidance coordinator	—	1,784
Permits lead	—	535
CIE lead	—	535
<i>Subtotal</i>	3,200	2,854

# Program Management



Activity	Model Estimation (hours)	Projected Workload (hours)
<b>Program Administration and Support</b>		
Data management	5,660	1,784
Fee administration	3,600	1,566
Deputy attorney general	—	1,784
Administrative support	—	450
<i>Subtotal</i>	9,260	5,584
<b>Total</b>	<b>18,460 (10 FTE)</b>	<b>12,720 (7 FTE)</b>

# Permitting



- APPLICATION RECEIPT & LOG-IN
- APPLICATION REVIEW & APPROVAL
  - SITE VISIT
  - MODELING
- DEVELOPMENT OF PERMIT LIMITS & OTHER CONDITIONS
  - DRAFT PERMIT / FACT SHEET
- RECEIVE & RESPOND TO PUBLIC COMMENT
- PERMIT FINALIZATION & MAINTENANCE

# Idaho's NPDES Permit Universe



<b>NPDES Program</b>	<b># Permittees</b>
<b>Major Facilities (including POTWs)</b>	41
<b>Non-Majors (including POTWs)</b>	134
<b>General Permit Programs</b>	
CAFO	0
Industrial Stormwater	7
Construction Stormwater	278
Municipal Stormwater	16
Aquaculture	94
Other (pesticide, vessel, rec. dredge, etc.)	188
<b>POTWs</b>	
All	125
With pretreatment	13

# Permitting



Permit Type	Total No. Permits	Permits/Year
Major	41	8
Non-Major	134	27
General	11	2
<i>SubTotal</i>	<i>186</i>	<i>36</i>
NOIs	583	117
<b>Total</b>	<b>769</b>	<b>153</b>

# Permitting



<b>Individual Permits</b>	<b>Required Effort (hours/ permit or facility)</b>
<b>Permit Issuance or Renewal</b>	
• NPDES permits for major facilities	400
• NPDES permits for minor facilities	200

# Permitting



General Permits	Required Effort (hours/ permit or facility)
• Initial permit development	
▪ Concentrated animal feeding operations	3,600
▪ Stormwater	3,600
▪ Aquaculture	400
▪ Other	400
• Permit renewal	
▪ Concentrated animal feeding operations	1,800
▪ Stormwater	1,800
▪ Aquaculture	200
▪ Other	200
• Authorization for coverage under general permit	2

# Permitting



Activity	Annual Number of Permits/ Facilities Affected	Total Hours Required Annually
Permit Issuance	156	14,594
Permit Appeals	1.5	141
Total	156.5	14,735

# Permitting



- Currently EPA Region 10 employs 13–14 permit writers as follows:
  - 10 FTEs on individual permits and pretreatment
  - 1 FTE for the MSGP and CGP
  - 1 FTE for the MS4 general permit
  - 1–2 FTE for other sector-specific general permits (pesticide, vessel, suction dredging, aquaculture)

Year	# Ind. Permits issued	# Gen. Permits issued
2014	10	1 (Groundwater Rem.)
2013	12	1 (Rec. Dredge)
2012	14	2 (CAFO, CGP)

# Compliance, Inspection, and Enforcement



- **REVIEW OF DMR**
- **FACILITY INSPECTION**
  - **REPORTING**
- **ENFORCING PERMIT CONDITIONS**

# Compliance, Inspection, and Enforcement



<b>Type of Facility</b>	<b>Average Number of DMRs per Facility per Year</b>
<b>Major facility with individual NPDES permit</b>	<b>12.0</b>
<b>Minor facility with individual NPDES permit</b>	<b>4.0</b>
<b>Combined sewer overflows and sanitary sewer overflows</b>	<b>0.0</b>
<b>Non-stormwater general permittee</b>	<b>4.0</b>
<b>Aquaculture general permittee</b>	<b>12.0</b>
<b>Stormwater general permittee</b>	<b>1.0</b>

# Compliance, Inspection, and Enforcement



Activity	Number of DMRs/ Facilities/ Permits	Total Hours Required
DMRs	3,729	3,729
Compliance & Inspections	124	6,031
Enforcement		5,339
Total		15,099

# Compliance, Inspection, and Enforcement



- DEQ performed 50 inspections in 2014 expending approximately 2,955 hours or ~ 59 hours/inspection
  - reviewing the permit and associated DMRs,
  - compiling and reviewing other pertinent information,
  - travel to/from facility,
  - inspecting facility,
  - writing and submitting inspection report, and
  - completing and submitting form 3560.

# Compliance, Inspection, and Enforcement



- DEQ would need to complete 124 inspections/year or 7,328 hours
- DEQ performed inspections at aquaculture facilities in 2014 expending 1,586 hours

Activity	Hours
Inspection / Compliance Monitoring	8,914
Enforcement	5,339
Total	14,253

# Conclusions



- **COMPARISON OF MODEL TO PROJECTED WORKLOAD**
  - **BUDGET PREDICTIONS**

# Comparison of Model to Projected Workload



Component	Model Estimation Hours (FTEs)	Projected Workload Estimates Hours (FTEs)
Program administration	12,800 (7)	9,152 (5)
Data management	5,660 (3)	1,784 (1)
Attorney general's office support	NA	1,784 (1)
Permitting	14,735 (8)	19,800 (11)
Compliance and enforcement	15,099 (8)	14,253 (8)
<b>Total</b>	<b>48,294 (27)</b>	<b>46,773 (26)</b>

# Budget Predictions



- Total of 46,773 hours (26 FTEs).

<b>Program Item</b>	<b>Annual Cost (\$)</b>
<b>Personnel</b>	2,721,397
<b>Equipment</b>	6,520
<b>Laboratory &amp; sampling</b>	31,055
<b>Licensing</b>	2,698
<b>Total program cost</b>	2,761,670

# In closing....



- The report provides estimates for overall program resource needs. A fully functional program in Idaho will need:
  - 26 Full time equivalents (FTEs)
  - \$2.7 million dollars
  - To issue ~36 permits per year
  - To complete 124 inspections per year

# Compared to other states



- Most states use a combination of fees, federal and state funding
- Most states assess an annual fee –
  - General permit fees range from \$0 - \$9,880
  - Individual permit fees range from \$75 - \$100,000+
- Many states charge a separate permit review or application fee –
  - Fees range from \$0 - \$10,000

# Region 10 and other neighboring states



State	Program Cost (Million)	FTEs	# Individual Permittees	# General Permittees	Program elements
AK	\$5.6	45	59	22	
OR	\$5.9	44	365	4,822	Pretreatment & Biosolids
WA	\$12.4	NA	820	4,700	CAFO & Pretreatment
MT	\$2.9	29	167	1,171	CAFO
UT	\$2.2	18	169	3,005	CAFO, Pretreatment, & Biosolids
WY	\$4+	24	1,100	1,600	CAFO
NV	\$1.5 (3.0)	14.5	112	2,699	CAFO

# Thank you



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