# Water Quality Control Division
# 2012 Request for Information Report

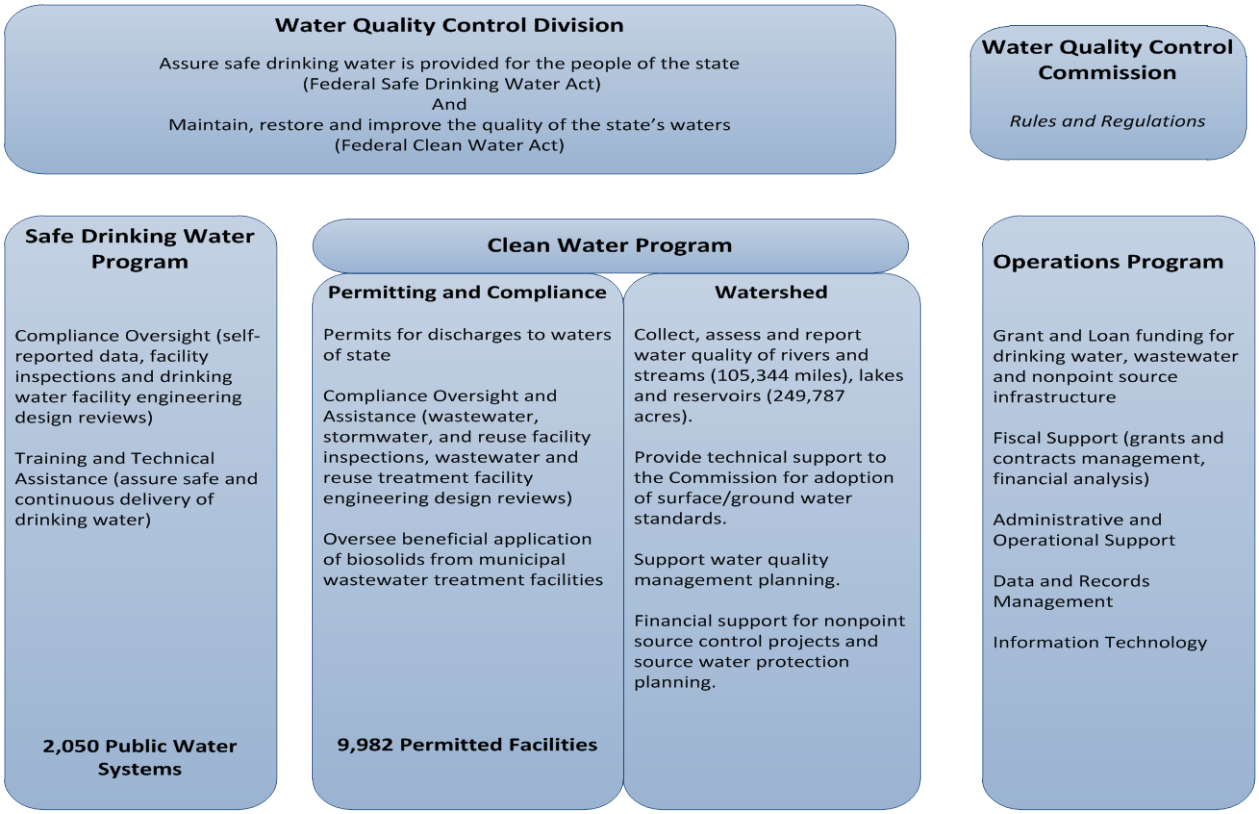
The management of Colorado's water quality is crucial to the continued development of the State, and to the quality of life the state offers to its citizens. The Water Quality Control Division (Division) plays an important role in the protection and restoration of the State's streams, lakes and reservoirs and in assuring that the citizens of Colorado have safe water to drink.

**Mission: Protect and restore water quality for public health and the environment**

**Strategic Goals:**

- Prevent waterborne disease and reduce chronic public health risks from drinking water through improved implementation of the federal Safe Drinking Water Act and Colorado's drinking water statutes and regulations;
- Protect all designated uses by attaining water quality standards through improved implementation of the federal Clean Water Act and Colorado Water Quality Control Act and their associated regulations;
- Restore impaired water quality to attainable standards through improved implementation of the federal Clean Water Act and Colorado Water Quality Control Act and their associated regulations; and
- Deploy resources to achieve the greatest benefit for public health and the environment while pursuing a strategy of organizational improvement that includes increasing efficiency.

The Division is comprised of the Safe Drinking Water, Clean Water and Operations Programs.



This document is provided as a supplement and update to the Water Quality Control Division's 2011 Request for Information (RFI). The 2011 RFI provided detailed information on the Division's authority, responsibilities, workload, and demands. This document provides specific information detailing and quantifying needed resources. The Division has identified a need of an additional 31.85 FTE and $222,754 in annual operating resources within the next 12-18 months. However, this document does not constitute request for additional FTE or resources, it is submitted in compliance with Legislative request.

| **2012 Water Quality Control Division Request For Information<br>November 2012** | | | |
|---|---|---|---|
| **YEAR 1 FTE Needs** | | | |
| **Section/Unit** | | **Position/Tasks** | **FTE** |
| Clean Water | Permits Section | Technical – Permit Backlog. Maintain current permit backlog. | 1.00 |
| | | Technical – Permit Backlog. Reduce permit backlog. | 2.30 |
| | | Technical – Measuring Compliance. Conduct construction sector inspections. | 3.10 |
| | | Technical – Measuring Compliance. Conduct industrial sector (stormwater) inspections. | 2.90 |
| | | Technical – Measuring Compliance. Municipal sector (stormwater MS4) audits. | 2.40 |
| | | Technical – Measuring Compliance. Reuse sector inspections and audits. | 0.50 |
| | Compliance & Enforcement Unit | Technical – Compliance Oversight. Review self-reported data and determine compliance. | 1.80 |
| | | Technical – Formal Enforcement Actions. Develop, issue, and follow up on formal enforcement actions. | 2.80 |
| | Environmental Data Unit | Technical – Water Quality Status. Assess water quality data, determine standards attainment, and report information. | 2.00 |
| | | Technical – Water Quality Status. Implement Control Regulation 85 monitoring provisions. | 0.50 |
| | | Technical – Water Quality Status. Implement aquatic biological and Control Regulation 85 nutrient criteria assessments. | 0.50 |
| | Standards Unit | Technical – Water Quality Protection (standards refinement and implementation). Develop and implement policy and guidance document for discharger specific variance program. | 0.25 |
| | | Technical – Water Quality Protection. Implement policy and guidance for discharger specific variance program. | 1.00 |
| | | Technical – Water Quality Protection. Support Control Regulations 85 (nutrients) and 31 (basic standards) implementation. | 0.20 |
| | | Technical – Water Quality Protection. Develop site-specific standards (e.g., copper, ammonia, and temperature). | 0.60 |
| | Restoration & Protection Unit | Technical – Water Quality Restoration. Manage nonpoint source pollutant projects. | 1.00 |
| | | Technical – Water Quality Restoration. Implement Control Regulation 85 nonpoint source management provisions. | 0.50 |
| | | ***Clean Water Program Subtotal*** | ***23.35*** |
| Drinking Water | Compliance Assurance/Enforcement | Administrative - Address enforcement backlog and Compliance support. | 1.00 |
| | | Technical - Compliance specialists to assist EPA required lead/copper and public notice rules. | 2.50 |
| | | ***Drinking Water Program Subtotal*** | ***3.50*** |
| Operations | Operations | Data Management | 2.00 |
| | | Record Management | 2.00 (Three-Year Limited Term FTEs) |
| | | Community Relations Liaison | 1.00 |
| | | ***Operations Program Subtotal*** | ***5.00*** |
| | | **Total FTE Needed Year 1** | **31.85** |

| Year 1 Annual Operating Resource Needs | |
|---|---|
| Operating costs associated with IT hardware support including servers, disaster recovery, automation of Records Center, system upgrades, establishment/maintenance of web presence, increased bandwidth and automated submission of electronic records. Includes:<br>• network drive space to cover increased application backup requirements for effective disaster recovery of critical division databases (Safe Drinking Water Information System (SDWIS), Environmental Data Management System (EQuIS), SharePoint 2007 and 2010, and Electronic Record System) and establish offsite (cloud) backup and recovery options for long term storage ($24,000)<br>• contractor support to cover SharePoint development, maintenance, and support. Funding could provide 1,887 hours (1,887 x $53/hour) of support from a dedicated OIT application developer or 690 hours (690 x $145) contracted assistance from outside consulting services to continue development of inspection, submittal, compliance, enforcement and other business tracking solutions and workflows ($100,000) | **$124,000** |
| Laboratory Analytical Costs | **$98,754** |
| **Total Operating Resource Needs Year 1** | **$222,754** |

## Clean Water Program SFY 2013 Resource Needs

The Clean Water Program has identified the need of 23.35 additional FTE to address the following service demands:

- Permits Section
  - Activity: Technical Support for permit measures.
    - Task: Maintain current permit backlog.

| *Current Service Universe* | *Current Service Output per Year* | *Current FTE Dedicated to Service Output* | *Current Service Output per Current FTE* | *Desired Service Output per Year* | *Service Output Goal Delta* | *FTE Needed to Meet Output Goal* |
|---|---|---|---|---|---|---|
| 401 permits | 72 | 9.0 | 8 | 80 | 8 | 1.0 |

Justification: The Colorado Water Quality Control Act directs the Division to issue a permit within 180 days of receipt of an application and therefore provide services at a level resulting in no permit issuance backlog. However, the Division is not funded at a level to provide this level of service. The total number of permits included in this measure is 401, and the Division is directed to renew these permits once every five years. The Division would need to issue 80 permits per year (desired service output) instead of 72 permits per year (current service output) in order to maintain the current backlog rate. One (1.0) FTE is needed to maintain the current rate of backlog and prevent the backlog from increasing in future years.

  - Activity: Technical Support for reducing current permit backlog.
    - Task: Reduce permit backlog.

| *Current Service Universe* | *Current Service Output per Year* | *Current FTE Dedicated to Service Output* | *Current Service Output per Current FTE* | *Desired Service Output per Year* | *Service Output Goal Delta* | *FTE Needed to Meet Output Goal* |
|---|---|---|---|---|---|---|
| 91 | 0 | 0.0 | 0 | 18 | 18 | 2.3 |

Justification: The Colorado Water Quality Control Act directs the Division to issue a permit within 180 days of receipt of an application and therefore provide services at a level resulting in no permit issuance backlog. However, the Division is not funded at a level to provide this level of service. The current number of backlogged permits is 91, and the Division would need to issue 18 of these 91 permits per year to essentially eliminate the permit backlog. Two (2.0) FTE are needed to reduce the

current number of backlogged permits over a 5 year period.

- Activity: Technical Support for measuring compliance.
  - Task: Conduct construction sector inspections.

| *Current Service Universe* | *Current Service Output per Year* | *Current FTE Dedicated to Service Output* | *Current Service Output per Current FTE* | *Desired Service Output per Year* | *Service Output Goal Delta* | *FTE Needed to Meet Output Goal* |
|---|---|---|---|---|---|---|
| 3,174 inspections | 63 | 1.0 | 61 | 254 | 190 | 3.1 |

Justification: The stormwater construction permit accounts for over 90% of construction sector permit authorizations but does not include numeric effluent limitations or require routine water quality monitoring. Instead, these permits require adaptive management practices to be planned, implemented, and monitored at construction sites by the responsible operators. Site inspections are the primary method used to measure permit compliance. The Division also uses site inspections as opportunities to provide targeted compliance assistance and to collect information that is used to determine if formal enforcement is appropriate. The Division currently inspects approximately 2% of the permitted universe per year which falls short of the goal of inspecting 8% per year. Inspection target levels vary by sector, and while 8% is a small oversight rate compared to other regulated sectors, an increase in oversight to this level would help to provide more robust information regarding industry compliance levels, would provide more statewide compliance assistance, and would help to level the playing field as long as a commensurate increase in enforcement resources is provided.

- Activity: Technical Support for measuring compliance.
  - Task: Conduct industrial sector (stormwater) inspections.

| *Current Service Universe* | *Current Service Output per Year* | *Current FTE Dedicated to Service Output* | *Current Service Output per Current FTE* | *Desired Service Output per Year* | *Service Output Goal Delta* | *FTE Needed to Meet Output Goal* |
|---|---|---|---|---|---|---|
| 1,946 inspections | 10 | 0.2 | 55 | 170 | 160 | 2.9 |

Justification: A total of 2,208 active stormwater industrial (non-construction) permits are issued by the Division to minor facilities. The majority of these (88% or 1,946 permits) are facilities that do not also have a process wastewater permit. Stormwater industrial permits, like stormwater construction permits, require adaptive management techniques to be planned, implemented, and monitored by site operators in lieu of numeric effluent limitations. Site inspections are the primary method used for measuring permit compliance. Industrial stormwater permits are also being significantly revised for the first time in 20 years, and field inspections provide the opportunity to provide targeted compliance assistance and to collect information that is used to determine if formal enforcement is appropriate. The Division currently inspects less than 1% of the permitted universe per year which falls short of the
goal of inspecting 10% of the permitted universe per year. Inspection target levels vary by sector, and 10% is a small oversight rate compared to other regulated sectors. Increased oversight would provide more robust information regarding industry compliance levels, more statewide compliance assistance, and help to level the playing field as long as a commensurate increase in enforcement resources is provided.

- Activity: Technical Support for measuring compliance.
  - Task: Municipal sector (stormwater MS4) audits.

| *Current Service Universe* | *Current Service Output per Year* | *Current FTE Dedicated to Service Output* | *Current Service Output per Current FTE* | *Desired Service Output per Year* | *Service Output Goal Delta* | *FTE Needed to Meet Output Goal* |
|---|---|---|---|---|---|---|
| 118 | 4.1 | .5 | 8 | 23.6 | 20 | 2.40 |

Justification: The Division has a total of 118 active stormwater permits issued to municipalities authorizing discharges from their municipal separate storm sewer systems (MS4s). These permits require municipalities to develop water quality control programs that include the following 6 areas: municipal operations, new development and redevelopment, construction site control, illicit discharge detection and elimination, and public education. Program audits are the available tool for measuring permit compliance and the effectiveness of these local programs. The Division currently is able to conduct audits of 3% of the permitted universe per year. Inspection target levels have a goal of auditing 20% of the permitted universe each year and result in each permittee being evaluated once every 5 years. Two and one-half (2.5) FTE are needed to reduce the current number of backlogged permits over a 5 year period.

- Activity: Technical Support for measuring compliance.
  - Task: Reuse sector inspections and audits.

| *Current Service Universe* | *Current Service Output per Year* | *Current FTE Dedicated to Service Output* | *Current Service Output per Current FTE* | *Desired Service Output per Year* | *Service Output Goal Delta* | *FTE Needed to Meet Output Goal* |
|---|---|---|---|---|---|---|
| 23 entities | 0 | 0.0 | 0 | 4.6 | 5 | 0.5 |

Justification: The Division has a total of 23 active reuse treaters (entities providing reclaimed water) to 324 authorized users or sites. The reuse program was first developed through statutory change in 2000. However, no fees were established or new resources provided to implement this new regulatory program. In 2007, fees were established at a level that would fund permitting, thus eliminating the need to subsidize ongoing permitting work with revenues collected from other programs. The program currently has no routine compliance oversight of the treaters, oversight of users, or directly of users' compliance levels. The most efficient method for evaluating overall compliance would be through conducting audits of treaters to ensure that they are overseeing users. Inspection target levels have a goal of auditing 20% of the permitted universe each year and result in each treater being evaluated once every 5 years. One-half (0.5) FTE is estimated needed to audit these entities over a 5 year period.

- <u>Compliance & Enforcement Unit</u>
  - Activity: Technical Support for compliance oversight.
    - Task: Review self-reported submittals for industrial, municipal wastewater, groundwater, and stormwater facilities.

| *Current Service Universe* | *Current Service Output per Year* | *Current FTE Dedicated to Service Output* | *Current Service Output per Current FTE* | *Desired Service Output per Year* | *Service Output Goal Delta* | *FTE Needed to Meet Output Goal* |
|---|---|---|---|---|---|---|
| ~29K deficient DMRs, 512 delinquent DMRs, 2,038 effluent violations | Varies based on the severity and complexity of the violation. | 1.8 | Variable based on workload priorities. | Increased volume and more timely response actions. | >29K deficient DMRs, >512 delinquent DMRs, >2,038 effluent violations | 1.8 |

Justification: Current Discharge Monitoring Report (DMR) violations are comprised of deficiencies (i.e., required data missing), delinquencies (i.e., not received), and 2,038 effluent violations that require review, evaluation, and some level of response. Part of the compliance oversight process includes technical assistance to regulated entities on DMR completion, violation response, and other aspects of data reporting. At current staffing levels of 1.8 FTE, the Division is able to adequately review and respond to approximately half of the current universe of reporting violations in a timely manner. Consequently, the Division is left to prioritize certain industry sectors and categories of violations for more detailed review while others receive minimal compliance oversight. A new general permit for the industrial stormwater sector became effective July 2012 and will generate an additional 2,200 DMRs per year for review to determine compliance. The Division currently has no FTE allocated for compliance oversight of the industrial stormwater sector. An estimated 1.8 FTE is needed to provide review of self reported submittals for industrial, municipal wastewater, groundwater, and stormwater sector facilities.

- Activity: Technical Support for formal enforcement actions.
  - Task: Develop, issue, and follow up on formal enforcement actions.

| *Current Service Universe* | *Current Service Output per Year* | *Current FTE Dedicated to Service Output* | *Current Service Output per Current FTE* | *Desired Service Output per Year* | *Service Output Goal Delta* | *FTE Needed to Meet Output Goal* |
|---|---|---|---|---|---|---|
| ~60 actions | 30 | 2.8 | 11 | 60 | 30 | 2.8 |

Justification: This task involves formal enforcement actions for violations that meet the Division Enforcement Response Guidance criteria. The Division has deferred 76 enforcement cases since 2008 that met the Division's criteria and 108 occurrences of chronic DMR delinquency since 2011. While formal enforcement activities fluctuate due to several factors, the Division estimates that approximately 60 new formal enforcement cases will become evident annually. However, with competing enforcement priorities and workload, formal enforcement actions have not been pursued. An estimated 2.8 FTE are needed to adequately develop, issue and follow up on formal enforcement actions.

- Environmental Data Unit
  - Activity: Technical Support for water quality status.
    - Task: Assess water quality data, determine standards attainment, and report information.

| *Current Service Universe* | *Current Service Output per Year* | *Current FTE Dedicated to Service Output* | *Current Service Output per Current FTE* | *Desired Service Output per Year* | *Service Output Goal Delta* | *FTE Needed to Meet Output Goal* |
|---|---|---|---|---|---|---|
| 3 water projects | 0 | 2.0 | 0 | 3 | 3 | 2.0 |

Justification: There are six large water development projects (Moffat Expansion Project, Windy Gap Firming Project, Reuter Hess Reservoir Expansion, Chatfield Reallocation, Northern Integrated Supply Project (NISP), and Halligan Seaman Project) that will require certification from the Division (WQCD?) in the next two years. Water development projects require certification that all water quality impacts are adequately addressed. In SFY 2012-13, submission of three applications is anticipated. The Division has limited experience with the level of effort necessary to conduct the certifications, but best estimates are up to 2,600 hours per certification and up to 475 hours per appeal if the project is appealed to the Water Quality Control Commission and possibly further to a state court. Estimates are based on the scale of the projects, level of technical complexity, and anticipated public involvement. The Division has approximately 2.0 FTE currently allocated to work on these projects and estimates that an additional 2.0 FTE will be required to address this increased

workload.

- Activity: Technical Support for water quality status.
  - Task: Implement Control Regulation 85 monitoring provisions.

| *Current Service Universe* | *Current Service Output per Year* | *Current FTE Dedicated to Service Output* | *Current Service Output per Current FTE* | *Desired Service Output per Year* | *Service Output Goal Delta* | *FTE Needed to Meet Output Goal* |
|---|---|---|---|---|---|---|
| ~400 facilities | 0 | 0.5 | 0 | 400 | 400 | 0.5 |

Justification: Approximately four hundred facilities are required to implement the new surface water monitoring requirements as identified in Regulation No. 85 – Nutrient Management Controls. This is a new regulation and the monitoring requirement has not yet been implemented. This data will be submitted to the Division for management, assessment, and ultimately reporting to the Water Quality Control Commission. It is estimated that the tasks of customer service with sampling and analysis plans, sample collection, and data receipt, management, and quality assurance will total up to 2.5 hours per facility for a total of 1,000 hours. This results in an estimated additional 0.5 FTE to address this increased workload.

- Activity: Technical Support for water quality status.
  - Task: Implement aquatic biological and Control Regulation 85 nutrient criteria assessments.

| *Current Service Universe* | *Current Service Output per Year* | *Current FTE Dedicated to Service Output* | *Current Service Output per Current FTE* | *Desired Service Output per Year* | *Service Output Goal Delta* | *FTE Needed to Meet Output Goal* |
|---|---|---|---|---|---|---|
| 40 assessments | 0 | 0.5 | 0 | 5 | 5 | 0.5 |

Justification: In 2010, the Water Quality Control Commission adopted Policy 10-1 (Aquatic Life Use Attainment) that identifies the assessment of aquatic life in surface water bodies. Implementation of this policy resulted in newly identified impaired water bodies in 2012. Over 40 segments were provisionally included on the 2012 impaired waters list (303(d) List) or the list where uncertainty remains regarding the assessment. These segments will need to be sampled and assessed to identify the pollutants causing the impairments. On average, it will take approximately 200 hours for additional sampling to be conducted on one provisionally listed segment including chemistry, macro invertebrate sampling and physical habitat sampling and to assess all data collected. At 5 segments per year, the Division will need 0.5 FTE to handle this additional workload.

- Activity: Technical Support for water quality status.
  - Task: Analyze water samples to obtain data to report on water quality status.

| *Current Service Universe* | *Current Service Output per Year* | *Current Funding Dedicated to Service Output* | *Current Service Output per Current Funding* | *Desired Service Output per Year* | *Service Output Goal Delta* | *Funding Needed to Meet Output Goal* |
|---|---|---|---|---|---|---|
| ~1,000 stations | 281 | $1,335 | 281 | 355 | 74 | $98,754 |

Justification: The status of surface water quality in Colorado is a high priority for CDPHE as one of ten Winnable Battles and for the Division as one of its five Clean Water Program results measures. Ambient water quality data collected at a regular frequency ultimately provides information used by various public and private entities in their data-driven decision making processes. The Division budget for water quality sample analysis has decreased from $470,000 to $375,000 over the last 5 years because of reductions in state funds as well as federal grant funds. This reduction coupled with

rising analytical costs has resulted in fewer locations being sampled and less data availability. In spite of this reduction, the demand for data from all interests has increased over the same time period. Over 1,000 sampling stations are currently utilized by the Division with approximately 281 sampled between 3 to 6 times per year at a cost of $1,335 per station. The Division is seeking a 21% increase in sampling sites per year (355) equaling an additional $98,754 in funding to meet an increasing demand for information.

- Standards Unit
  - Activity: Technical Support for water quality protection (standards refinement and implementation).
    - Task: Develop one policy and one guidance document for discharger specific variance program.

| *Current Service Universe* | *Current Service Output per Year* | *Current FTE Dedicated to Service Output* | *Current Service Output per Current FTE* | *Desired Service Output per Year* | *Service Output Goal Delta* | *FTE Needed to Meet Output Goal* |
|---|---|---|---|---|---|---|
| 4 policies | 1.3 | 1.0 | 1.3 | 1.6 | 0.3 | 0.25 |

Justification: The Standards Unit currently manages and updates 4 Water Quality Control Commission (WQCC) policies at a rate of approximately 1.3 per year using approximately 1.0 FTE. The WQCC will consider a new policy for discharger specific variances in an October 2013 rulemaking hearing. This policy will provide regulatory flexibility for permitted dischargers to implement current water quality standards that may pose technological or economic challenges to implement. Permitted dischargers are anxious for this policy to be developed and available for implementation, so a new policy should be developed and maintained into the future. The development is underway with current resources, but other work is being put aside. Based on the 1.0 current FTE and the goal to increase output to 1.6 policies per year, an additional 0.25 FTE is needed to finish the policy and maintain it in the future.

- Task: Implement policy and guidance for discharger specific variance program.

| *Current Service Universe* | *Current Service Output per Year* | *Current FTE Dedicated to Service Output* | *Current Service Output per Current FTE* | *Desired Service Output per Year* | *Service Output Goal Delta* | *FTE Needed to Meet Output Goal* |
|---|---|---|---|---|---|---|
| 7 DSVs | NA | 0.0 | 4 | 4 | 4 | 1.0 |

Justification: The Standards Unit will need to implement the policies/guidance for the discharger specific variance (DSV) policy identified in the previous task. This new program provides flexibility and relief for dischargers from effluent limits that pose technological or economic challenges. The policy and procedures are currently being developed in a stakeholder process. Although the process is not yet complete, an estimated seven (7) DSVs have been identified for action over the next year. It is assumed that only 4 applications will actually be received the first year of implementation. Based on the 0.0 current FTE and the goal to complete 4 DSV actions per year, an additional 0.25 FTE will be needed per DSV action for a total of a new 1.0 FTE to implement the program in the future.

- Task: Support Control Regulations 85 (nutrients) and 31 (basic standards) implementation.

| *Current Service Universe* | *Current Service Output per Year* | *Current FTE Dedicated to Service Output* | *Current Service Output per Current FTE* | *Desired Service Output per Year* | *Service Output Goal Delta* | *FTE Needed to Meet Output Goal* |
|---|---|---|---|---|---|---|

| | | | | | | |
|---|---|---|---|---|---|---|
| 6 regulation areas | 6 | 1.2 | 5.0 | 7 | 1 | 0.2 |

Justification: In 2012, the Water Quality Control Commission adopted Regulation No. 85 – Nutrients Management Control that is part of a coordinated strategy to address current and future potential nutrient pollution in Colorado surface waters. As such, the Standards Unit will provide technical staff to support the implementation of this new area of regulation. The Unit currently supports approximately 6 areas of regulation with, on average, approximately 0.2 FTE allocated to each one. This additional area of support will require 0.2 FTE for continued support in the future. Based on the current 1.2 FTE and the goal to support this new regulation each year, an additional 0.20 FTE is needed to provide technical support in future years.

- Task: Develop site specific standards (e.g., copper, ammonia, and temperature).

| *Current Service Universe* | *Current Service Output per Year* | *Current FTE Dedicated to Service Output* | *Current Service Output per Current FTE* | *Desired Service Output per Year* | *Service Output Goal Delta* | *FTE Needed to Meet Output Goal* |
|---|---|---|---|---|---|---|
| 6 regulation areas | 6 | 1.2 | 5.0 | 9 | 3 | 0.6 |

Justification: The Standards Unit is the focal point for the increased emphasis on assisting permitted dischargers and providing support to the WQCC with site-specific standards that provide regulatory flexibility and relief for dischargers. Similar to the item above, the Unit currently supports approximately 6 areas of regulation with, on average, approximately 0.2 FTE allocated to each one. Based on the current 1.2 FTE and the goal to consider three additional site-specific standards actions, an additional 0.6 FTE is needed to provide technical support in future years.

- Restoration & Protection Unit
  - Activity: Technical Support for water quality restoration.
    - Task: Nonpoint source pollutant project management.

| *Current Service Universe* | *Current Service Output per Year* | *Current FTE Dedicated to Service Output* | *Current Service Output per Current FTE* | *Desired Service Output per Year* | *Service Output Goal Delta* | *FTE Needed to Meet Output Goal* |
|---|---|---|---|---|---|---|
| 69 current contracts | 12 | 4.0 | 3 | 13 | 1 | 1.0 |

Justification: The Nonpoint Source Management work group currently manages 69 state contracts. The average contract management workload for four (4) project coordinators is oversight of 12 projects, which exceeds the desired project load of eight (8). This project load is based on the preferable situation of a minimum of four site visits per project per year. One (1) additional FTE is needed to conduct this number of site visits, which ensure that the project sponsor is adhering to all federal grant and state contract conditions, completing the approved project scope of work, and ultimately addressing the underlying water quality concern. In late 2010, the Water Quality Control Division became aware of a contract term violation due to a project sponsor starting and completing construction prior to contract execution. This incident is related to the high project workload of the coordinators that will be avoided with additional technical support.

  - Activity: Technical Support for water quality restoration.
    - Task: Implement Control Regulation 85 nonpoint source management provisions.

| *Current Service Universe* | *Current Service Output per Year* | *Current FTE Dedicated to Service Output* | *Current Service Output per Current FTE* | *Desired Service Output per Year* | *Service Output Goal Delta* | *FTE Needed to Meet Output Goal* |
|---|---|---|---|---|---|---|

| | | | | | | |
|---|---|---|---|---|---|---|
| ~20 NPS actions | 0 | 0.5 | 0 | 5 | 5 | 0.5 |

Justification: In 2012, the Water Quality Control Commission adopted Regulation No. 85 – Nutrients Management Control that is part of a coordinated strategy to address current and future potential nutrient pollution in Colorado surface waters. Regulation 85 outlines a process wherein nonpoint sources of nutrients are to implement voluntary controls over the next ten years. The Division is committed to assisting in this effort and is currently exploring ways to obtain funding for any future nonpoint source controls. A major stakeholder in this effort is the agricultural community throughout the state. The Restoration & Protection Unit will provide technical staff to engage this stakeholder group and support the implementation of this new regulation. Based on the 0.0 current FTE and the goal to complete 5 agriculture nonpoint source actions per year, an additional 0.5 FTE is needed to implement the provisions in the future.

**Drinking Water Program SFY 2013 Resource Needs**

The Drinking Water Compliance Assurance/Enforcement Section has identified the need for 3.5 additional FTE in Year 1.

| *Activity* | *Current Service Universe* | *Current Service Output per Current FTE* | *Desired Service Output per Year* | *Level of Effort* | *FTE Needed to Meet Output Goal* |
|---|---|---|---|---|---|
| Set sampling requirements, review sample results, follow-up on required actions, and ensure that the public is notified of problems. | 2,050 Public Water Systems | .5 | About 3 hours per water system per year | 6,150 hours | 2.5 |
| Process mail and documents, send letters, improve efficiency | 2,050 Public Water Systems | 0.0 | About 1 hour per system per year | 2,080 hours | 1.0 |

Justification: The Drinking Water Program is failing to assist public drinking water systems to keep up with EPA requirements of the lead/copper and public notice rules. Thus, the public may be exposed to higher levels of lead and copper in their drinking water. In general, the public may not be notified properly when there are drinking water problems. Notification should be taking place via mail or other media options including newspaper and television.

**Operations Program SFY 2013 Resource Needs**

The Operations Program has identified the need for 5.0 FTE (2 are Limited Term FTEs) in year one to provide programmatic support for the Division.

| *Activity* | *Current Service Universe* | *Current Service Output per Current FTE* | *Desired Service Output per Year* | *Level of Effort* | *FTE Needed to Meet Output Goal* |
|---|---|---|---|---|---|
| Data Management | 3,800 permits maintained in the EPA database of record<br><br>Annually 370,000 self reported monitoring results are entered in the EPA database of record. | 1.0 FTE enters permits<br><br>0 .5 FTE supervises and conducts quality assurance/quality control<br><br>1.25 FTE enter self monitoring data, maintain database of record<br><br>Total 2.75 FTE | 10,000 permits<br><br>100% of all self reported data entered in a timely manner or received electronically | 6,200 additional records and corresponding self reported monitoring results | 2.0 FTE<br><br>6,200 /10,000 = 62% increase in workload<br><br>62% x 2.75 current FTE =1.7 additional FTE needed |

Justification: Due to lack of resources only 3,800 permits are accounted for in the EPA database of record. Additional resources are needed to manage the data for the full universe of 10,000 permits in

the EPA database of record. This activity includes entering and providing quality assurance/quality control oversight of data entry of permit facility information (including updated contact information, facility locational data, permit limits, compliance schedule data, permit modifications, permit terminations and monthly self reporting monitoring data for the life of the permit). In addition to maintaining the permit database of record, employees enter 370,000 self-reported monitoring results annually into the EPA database of record. As the number of permits are entered into the EPA database of record the number of self-reported monitoring results will also increase.

| *Activity* | *Current Service Universe* | *Current Service Output per Current FTE* | *Desired Service Output per Year* | *Level of Effort* | *FTE Needed to Meet Output Goal* |
|---|---|---|---|---|---|
| Records Management | 10% of active files (400,000 paper pages) are currently maintained in electronic records system | 2.0 FTE | 100% of all active files available in electronic records system (17,000 active files - est. 4 million paper pages)<br><br>100% of all archived files (2700 cubic feet of archived documents required - est. 11.3 million paper pages)<br><br>Estimated total paper pages = 15.3 million | 14.9 million additional paper pages available in electronic records database | 2.0 FTE (Three-Year Limited Term FTE)<br><br>14.9m/15.3 m = 90% increase<br><br>90% x 2.0 current FTE =1.8 additional FTE needed in year 1 to make all files available in the electronic records system<br><br>***Once all records are entered current staff can maintain the records database*** |

Justification: The Division currently maintains on-site and off-site paper files. In an effort to reduce storage costs off-site and make files available electronically to internal and external customers, the Division has implemented an Environmental Programs Electronic Records System that houses Water Quality, Air Quality and Hazardous Material Divisions files. Only 10% of the Division's active files are available in the electronic records system. None of the archived files, required to be retained, are in the system. Currently, there are 2.0 FTE dedicated to this effort (1.0 FTE scans, applies Optical Character Recognition (OCR) tools, conducts quality assurance/control and uploads documents into electronic records database; 0.5 FTE files and purges paper files; and 0.5 FTE supervises, conducts quality assurance/quality control and applies/approves metadata for document identification, retrieval and electronic query.

| *Activity* | *Current Service Universe* | *Current Service Output per Current FTE* | *Desired Service Output per Year* | *Level of Effort* | *FTE Needed to Meet Output Goal* |
|---|---|---|---|---|---|

| | | | | | |
|---|---|---|---|---|---|
| Community Relations Liaison | Regulated entities, citizens, interested parties/stakeholders, media, executive branch, and legislature | 0.0 FTE are dedicated to this effort | Consistent and clear messages shared with our current service universe; engaged stakeholder discussions and support | 2,080 hours | 1.0 FTE |

Justification: A Community Relations Liaison will effectively communicate and engage our customers in policy, regulation and technical discussions related to water quality issues. Due to the size and complexity of the Division's roles and responsibilities, a Community Relations Liaison is needed to effectively communicate to our customers in terms that the lay person can understand. The resource will provide specialized expertise on the development and oversight of business communications strategies and communication technology development and implementation. The resources will be responsible for the oversight of the Division's media, website content management, coordination with the department on social media/Twitter, blogs and Face book communications. The Liaison will work with program staff to determine and meet ongoing communication needs. The implementation and maintenance of advanced communication technology will ensure effective connectivity and communication between the Denver office and the four field offices as well as our 12,000 regulated entities and many interested stakeholder groups. In addition, this position will be responsible for coordinating/developing news releases, legislative responses, reports and other written materials produced by the Division.

| **YEAR 2 FTE Needs** | | | |
|---|---|---|---|
| Clean Water | Support | Administrative | 1.5 |
| | Permitting | Permit Measures (Quality, Backlog, High Priorities) | 2.0 |
| | | Address Non-Filers | 1.0 |
| | Measuring Compliance | Self-Reported Data | 1.0 |
| | | Inspections | 3.0 |
| | Increasing Compliance | Responding to Violations and Inspection Follow- Up Coordinator | 1.5 |
| | Water Quality Status | Sampling, Assessing, and Reporting | 2.0 |
| | Water Quality Protection | Standards Development | 1.0 |
| | Water Quality Restoration | Planning and Nonpoint Source Project Management | 1.0 |
| Drinking Water | Capacity Building | Coach: Provides Assistance to Systems | 2.0 |
| | Compliance Assurance/Enforcement | Legal Assistant: Evaluate and Develop Formal Enforcement Actions | 0.5 |
| | | Administrative Assistant | 1.0 |
| | Engineering | Swim Pools | 1.0 |
| | | **Total FTE Needs Year 2** | **18.5** |
| **YEAR 2 Annual Operating Resource Needs** | | | |
| Operating costs associated with IT software and hardware support including servers, disaster recovery, maintain automated Records Center, system upgrades, maintenance of web presence, electronic and automated submission of information. Includes:<br>• network drive space to cover increased back-up requirements for effective disaster recovery of critical division databases (SDWIS, EQuIS, SharePoint 2010, and electronic records system) and maintain offsite (cloud) back-up and recovery options for long term storage ($24,000)<br>• contractor support to cover SharePoint development, maintenance, and support. Funding could provide 1,887 hours (1,887 x $53/hour) of support from a dedicated OIT application developer or 690 hours (690 x $145) contracted assistance from outside consulting services to continue development of inspection, submittal, compliance, enforcement and other business tracking solutions and workflows ($100,000) | | | **$124,000** |
| Laboratory Analytical Costs | | | **$98,754** |

| | | | |
|---|---|---|---|
| | | **Total Operating Resource Needs Year 2** | **$222,754** |
| **YEAR 3 FTE Needs** | | | |
| Clean Water | Support | Administrative | 1.5 |
| | Permitting | Permit Measures (Quality, Backlog, High Priorities) | 1.0 |
| | Permitting | Address Non-Filers | 1.0 |
| | Measuring Compliance | Self-Reported Data | 1.0 |
| | Measuring Compliance | Inspections | 3.0 |
| | Water Quality Status | Sampling, Assessing, and Reporting | 1.0 |
| | Water Quality Protection | Standards Development | 1.0 |
| | Water Quality Restoration | Planning and Nonpoint Source Project Management | 2.0 |
| Drinking Water | Capacity Building | Coach: Provides Assistance to Systems | 2.0 |
| | Compliance Assurance/Assistance | Measures and Assists With Compliance With New Rules | 1.0 |
| | | Enforcement Specialist | 1.0 |
| | Engineering | Swim Pools | 1.0 |
| | | **Total FTE Needed Year 3** | **16.5** |
| **YEAR 3 Annual Operating Resource Needs** | | | |
| Operating costs associated with IT software and hardware support including servers, disaster recovery, maintain automated Records Center, system upgrades, maintenance of web presence, electronic and automated submission of information. Includes:<br>• network drive space to cover increased backup requirements for effective disaster recovery of critical division databases (SDWIS, EQuIS, upgrade to new SharePoint platform, and electronic record center) and maintain offsite (cloud) backup and recovery options for long term storage ($24,000)<br>• contractor support to cover ongoing SharePoint development, maintenance, and support. Funding could provide 1,887 hours (1,887 x $53/hour) of support from a dedicated OIT application developer or 690 hours (690 x $145) contracted assistance from outside consulting services to continue development of inspection, submittal, compliance, enforcement and other business tracking solutions and workflows ($100,000) | | | **$124,000** |
| Laboratory Analytical Costs | | | **$98,754** |
| | | **Total Operating Resource Needs Year 3** | **$222,754** |