

***Section VI***

***Recommendations***

## RECOMMENDATIONS

This section of the report details the recommendations for revising SWRCB's fee structure and levels for its core regulatory programs. It also proposes a strategy and timetable for implementing the recommendations of focus group participants and our consulting team.

### RECOMMENDED CORE REGULATORY PROGRAM FEE STRUCTURE

Based on our document reviews, interviews, focus groups and our own interviews, we are recommending the following changes to SWRCB's core regulatory program fee structure:

- a. **"Fair share" concept.** Adopt the following concept for funding SWRCB's core regulatory program, which, in our opinion, is consistent with recommendations made by the Legislative Analyst's Office.

SWRCB Core Regulatory Program Activities	Proposed Source of Funding
Permitting, monitoring and inspection	Regulatory fees
Investigation and enforcement	General Fund
Abatement	Fines and penalties

- b. **Recommended alternative.** Adopt Alternative #3 to fund SWRCB core regulatory program permit issuance, monitoring and inspection functions and activities.
- c. **Annual adjustment factor.** Adopt an annual adjustment factor – utilizing the California Consumer Price Index – to adjust the regulatory fees recommended in this report for inflation of core regulatory program costs.
- d. **General Funding.** Request continued State General Fund resources to cover the cost of core regulatory program enforcement activities.
- e. **Investigation and enforcement cost recovery.** Require SWRCB and/or RWQCB staff to keep track of time spent on NPDES/WDR permit investigation and enforcement activities and bill NPDES/WDR permittees for such time and cost recovery at rates and procedures established in the State Administrative Manual (SAM) in cases that result in violations.
- f. **Late fees and finance charges** Impose late fees and finance charges on permittees who fail to pay permit fees or other charges at the required time and on permittees who fail to obtain required permits at rates and procedures established in the State Administrative Manual (SAM).
- g. **Abatement account.** Deposit funds received for investigation and enforcement cost recovery as well as late fees and finance charges into a core regulatory program abatement account to be used for cleanup activities and to fund grants for voluntary improvements to watersheds.
- h. Adopt the implementation strategy and timetable described below.

### RECOMMENDED IMPLEMENTATION STRATEGY AND TIMETABLE

We are recommending the following strategy and timetable to implement the new fee structure.

#### Implementation Strategy

Based on our document reviews, interviews and focus groups, we are recommending the following strategy to implement the proposed core regulatory program fee structure:

- **Advisory group.** Appoint a core regulatory program fee advisory group of 10-15 members to provide periodic input to SWRCB staff on proposed changes to the fee structure and levels as well as related issues.

## Implementation Timetable

Based on our document reviews, interviews and focus groups, we are recommending the following timetable to implement the proposed core regulatory program fee structure:

Timetable	Responsibility	Recommended Action
November 2000	Executive Staff	Present recommendations to the SWRCB Board for discussion and follow-up, as appropriate.
November 2000	Executive Staff / Consultants	Present conclusions and recommendations to appropriate staff of CalEPA, the Department of Finance, and the Legislative Analyst's Office for discussion and follow-up, as appropriate.
November 2000	Executive Staff / Consultants	Present conclusions and recommendations to staff of the appropriate legislative committees for discussion and follow-up, as appropriate.
November 2000	Executive Staff	Revise, as necessary, FY 2001/02 budget change proposals related to core regulatory program fees.
November 2000	Executive Staff	Draft the "charter" for the recommended advisory group.
December 2000	SWRCB Board	Appoint members of the recommended advisory group.
December 2000	Executive Staff / Consultants (if appropriate)	Meet with recommended advisory group to (a) finalize the "charter," (b) review the analysis, conclusions, and recommendations in this final report, and (c) "fine tune" recommended fee structure and levels.
December 2000	Executive Staff / Advisory Group	Outline proposed legislation to enact recommended changes to the core regulatory program fee structure and levels. Review proposed legislation with prospective sponsors in the Senate and Assembly.
December 2000	Executive Staff	Present recommended fee structure/levels and proposed legislation to the SWRCB Board for consideration and adoption.
December 2000	Executive Staff	Submit this final report to the Legislature as required by the FY 1999/2000 budget bill and SB 390.
January 2001	Legislative Sponsors	Present proposed legislation to authorize recommended fee structure/levels to the appropriate Senate and Assembly committees of the Legislature.

***Appendix A***

***Stakeholder Survey  
Questions & Responses***

California Environmental Protection Agency   
**STATE WATER CONTROL RESOURCE BOARD**

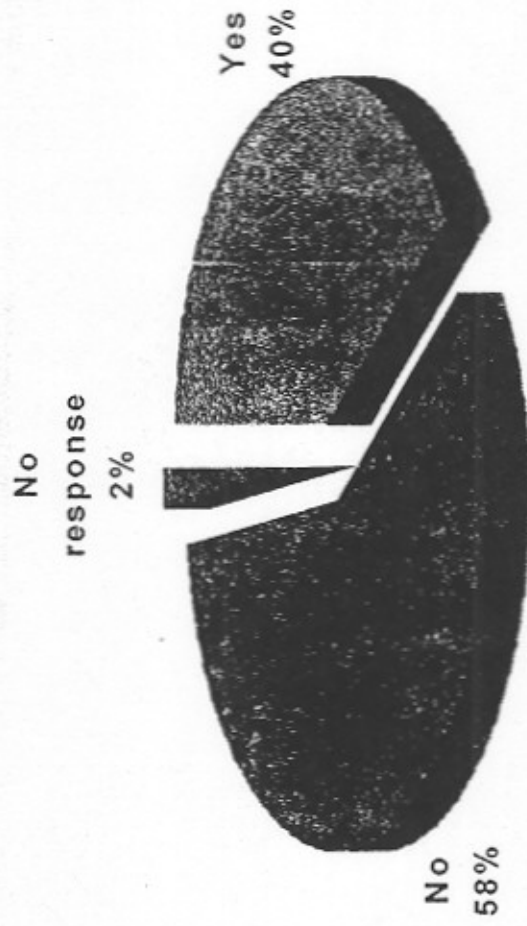
# **PRESENTATION**

# **SURVEY RESULTS**

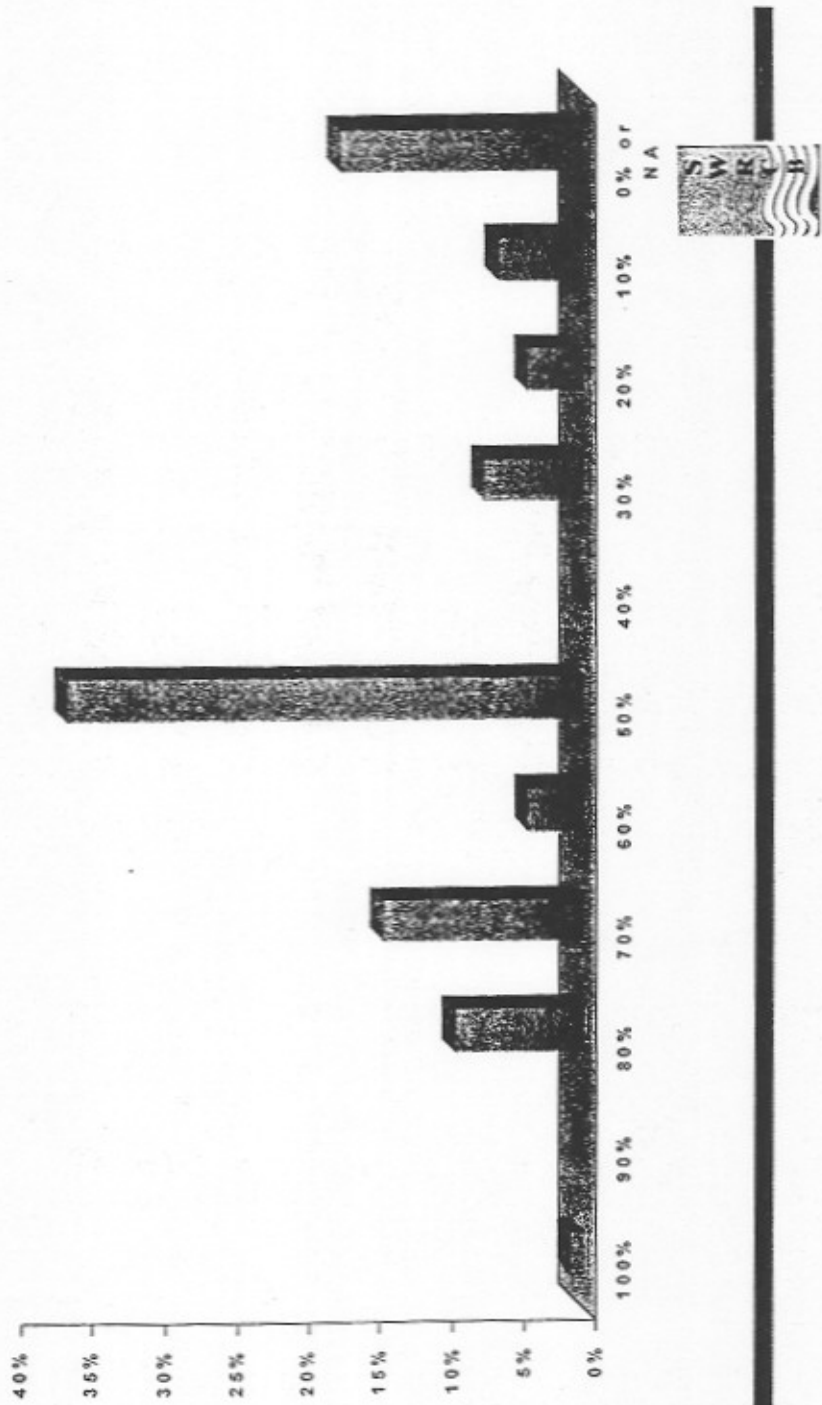
June 13 - 14, 2000



1) Should the costs of core regulatory program be fully recovered from permit fees?



If "No", what proportion of total program costs should be recovered from permit fees?



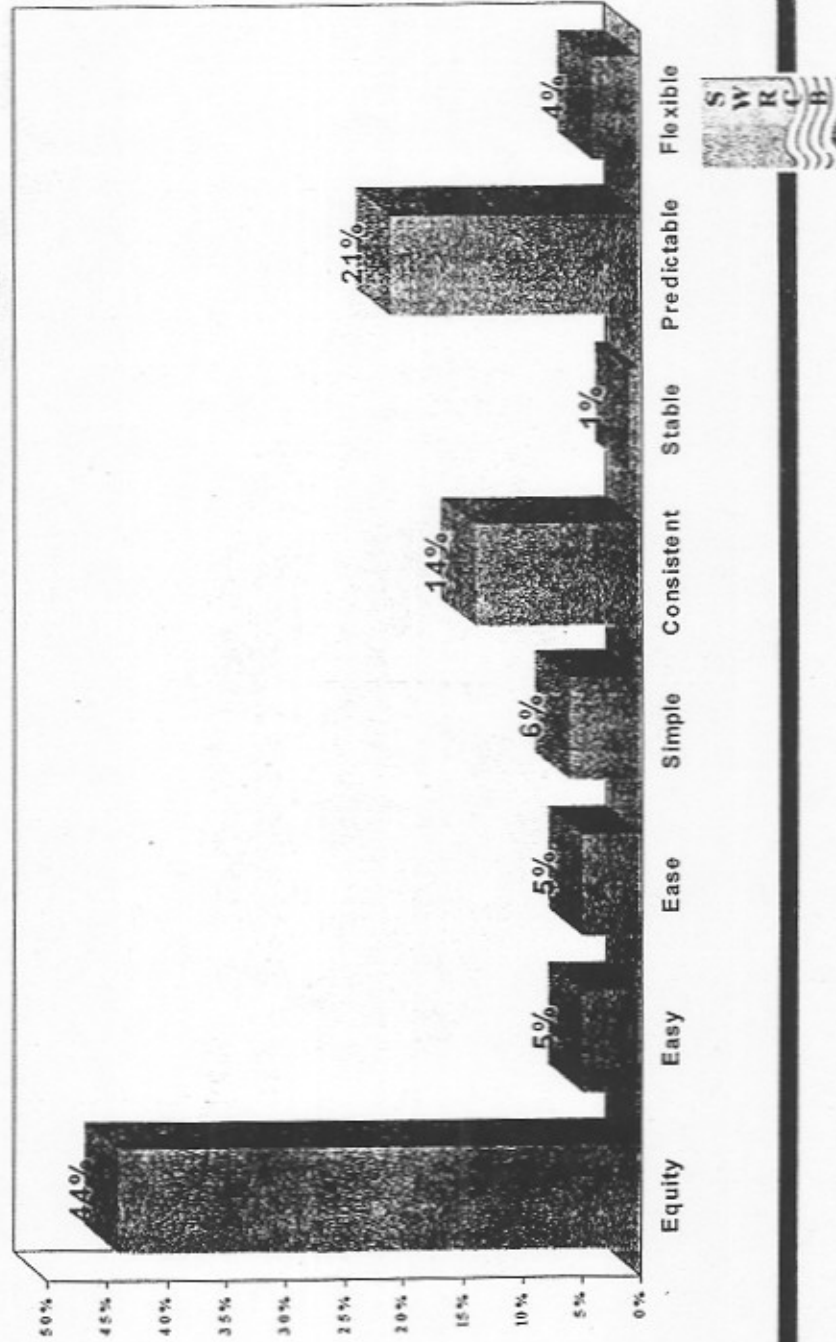
2) If you were rating the following criteria on its importance for a fee structure, which of the following criteria would be most important to you?

<u>Rank</u>	<u>Criteria</u>
1	Equity
2	Predictable
3	Simple
4	Consistent with Laws
5	Ease of Implementation
6	Easy to administer
7	Flexible
8	Stable Revenue Source

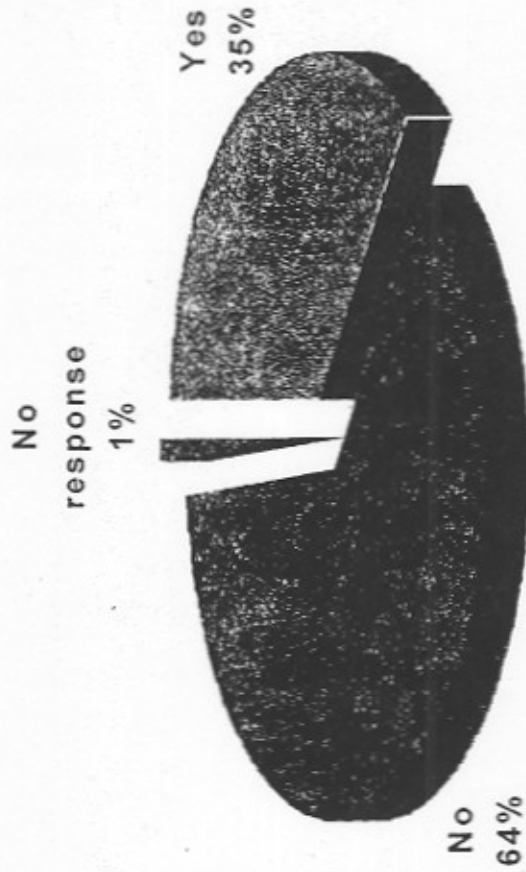




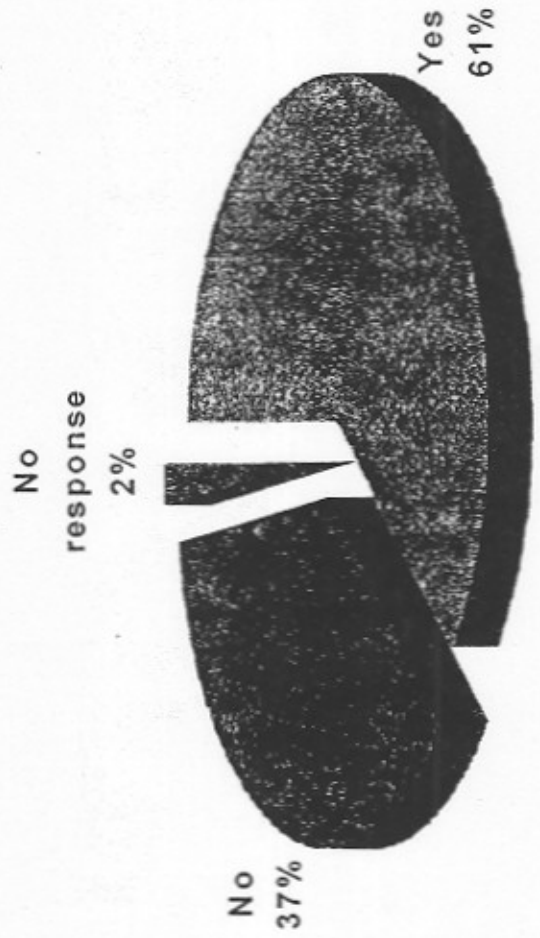
### Percentage of respondents that considered each criteria the most important



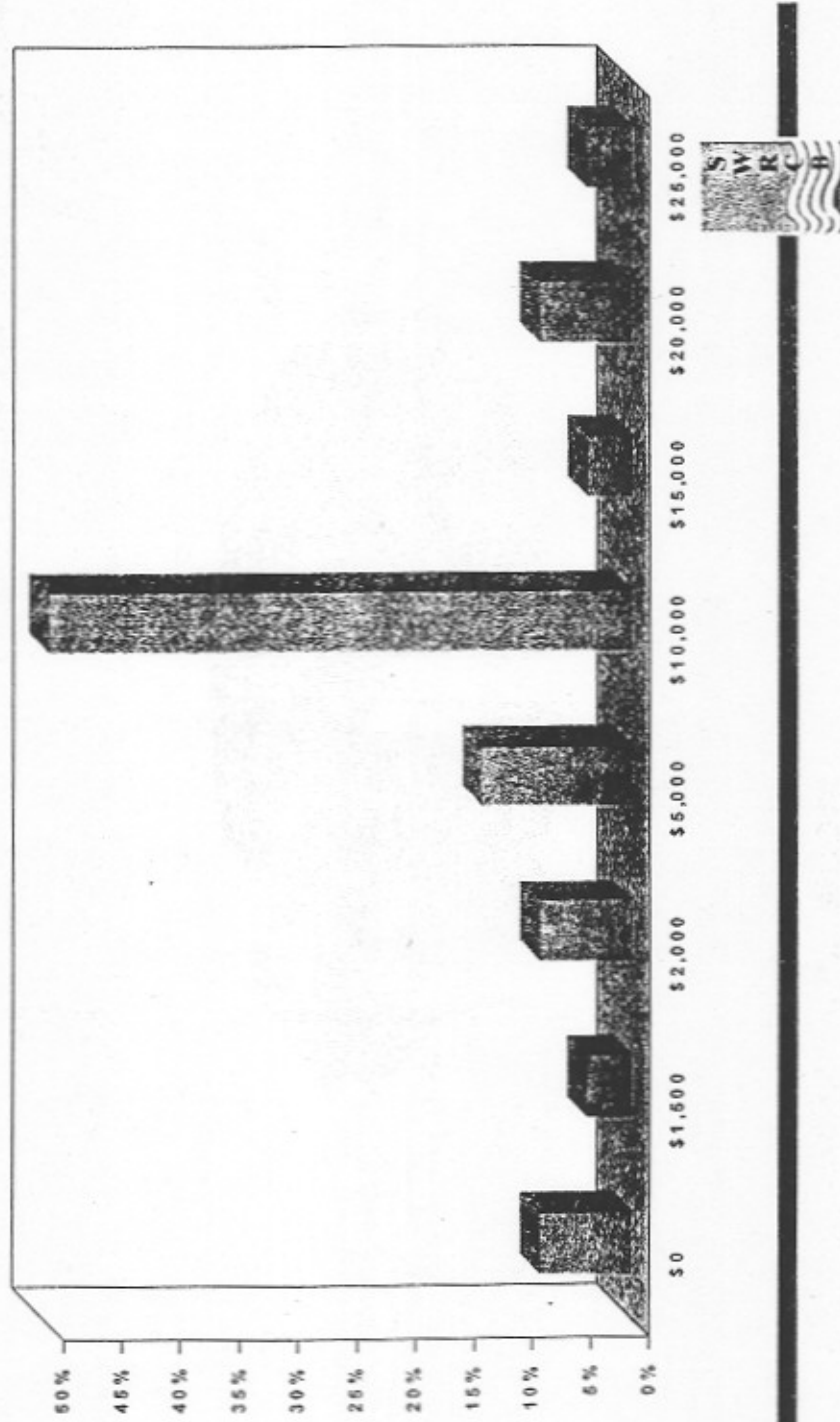
3) Should any proposed SWRCB water quality fee system have a cost of living adjustment build into the fees?



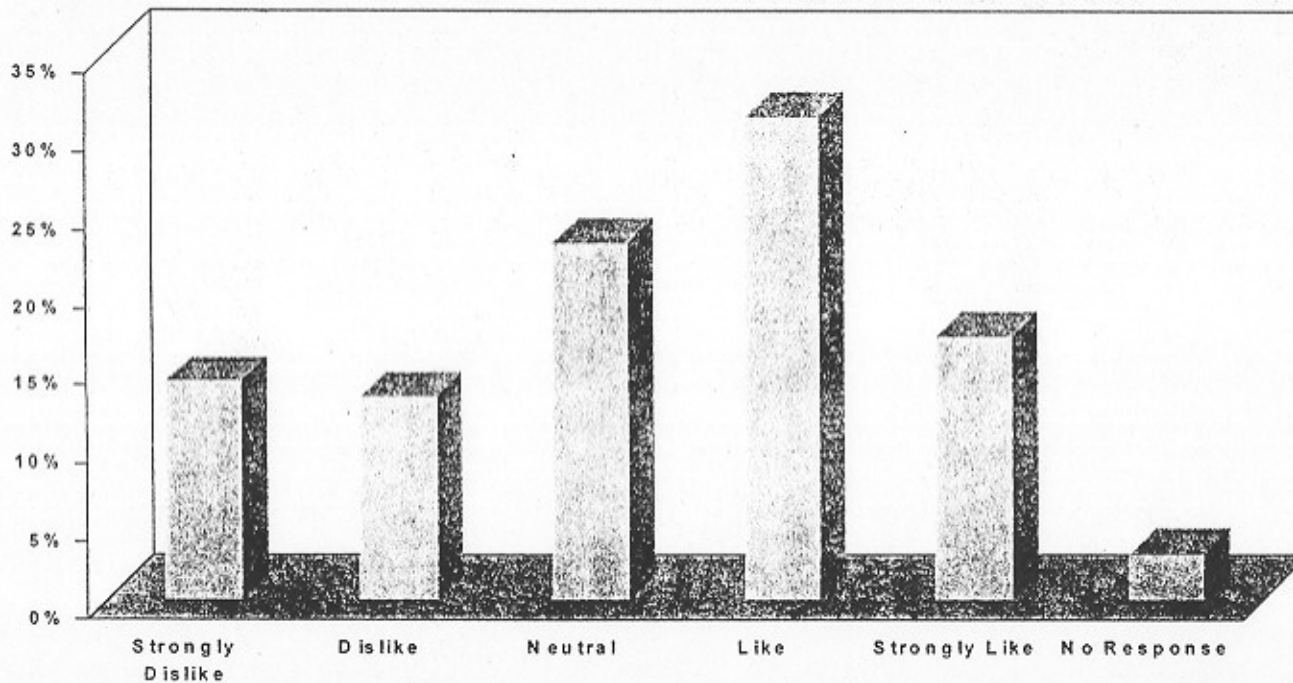
3) Should SWRCB water quality fees be capped at specific maximum amount?



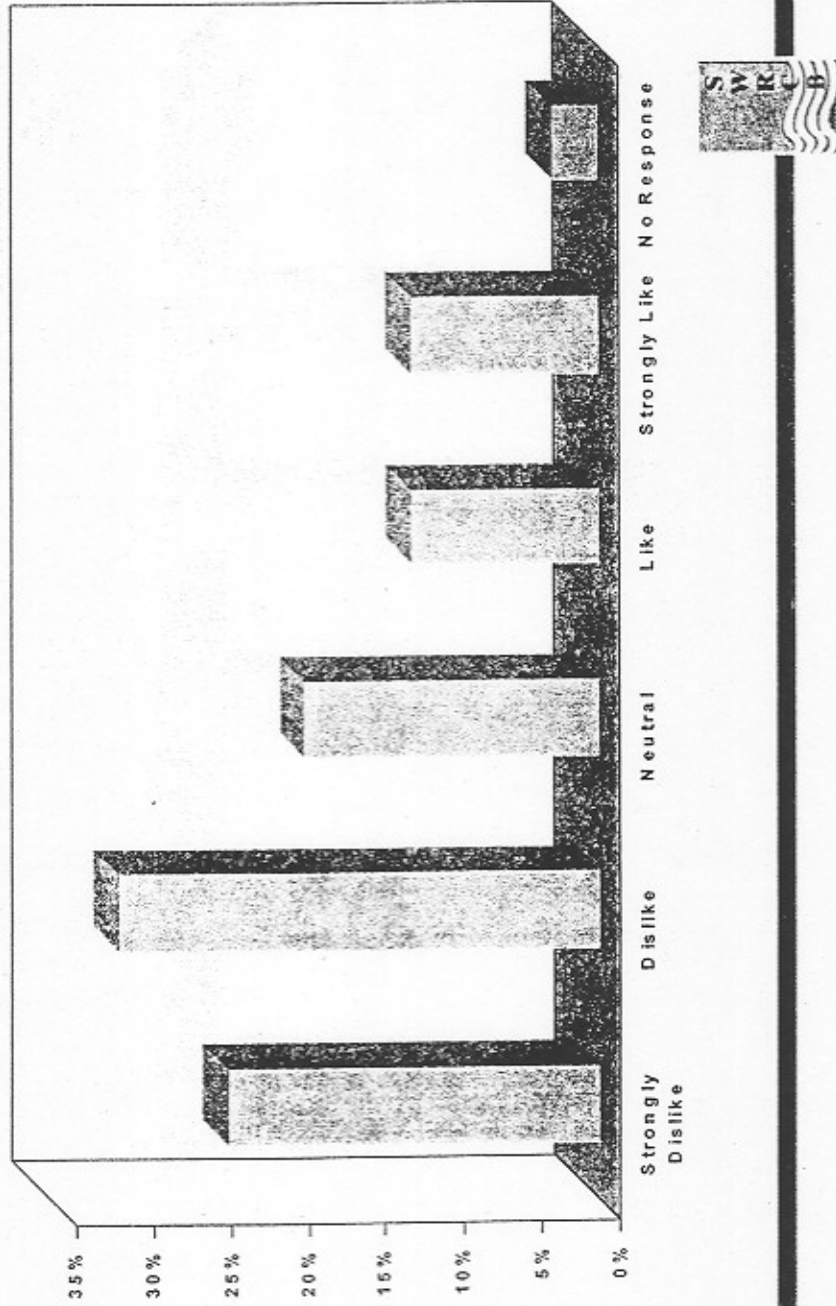
### If "Yes", what amount?



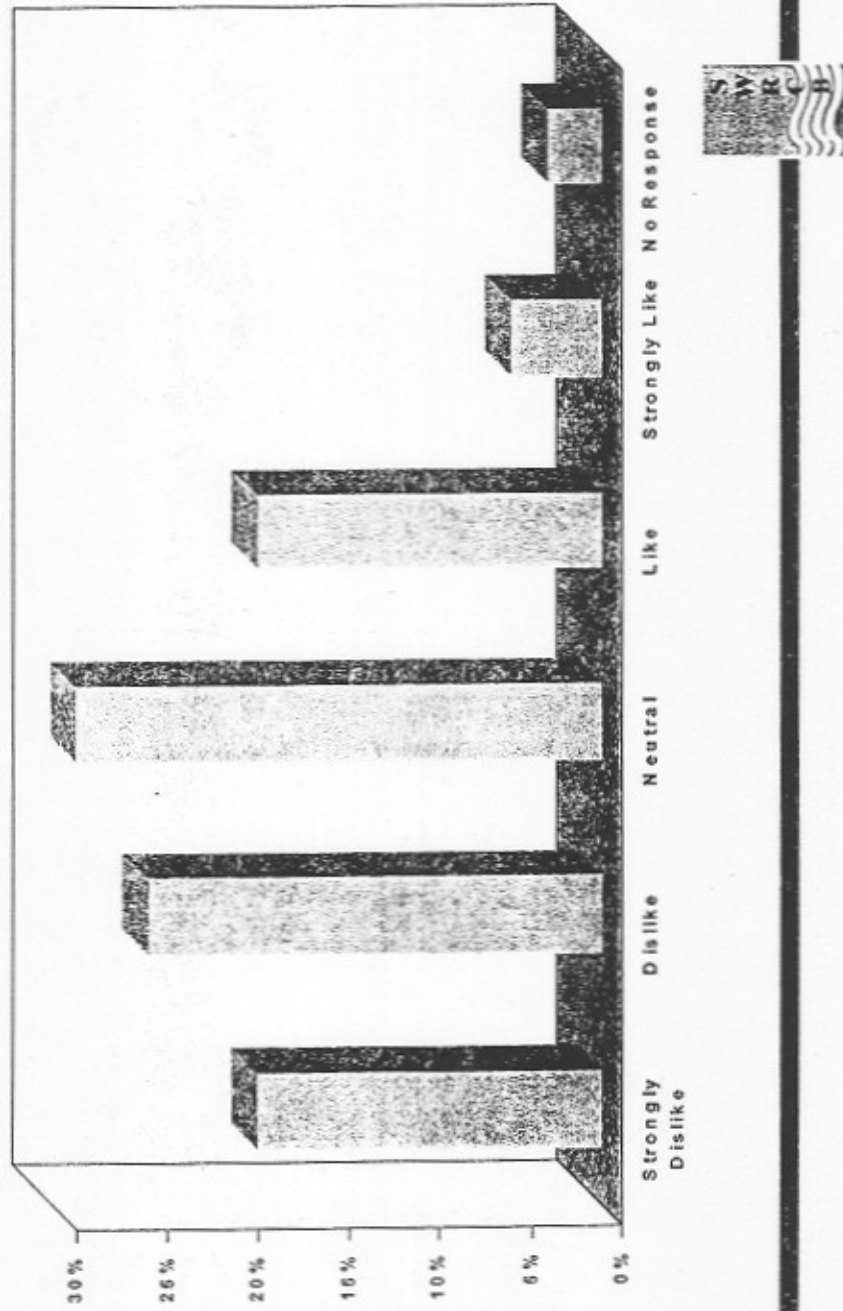
5) How do you feel about a rate structure that uses the actual charges by specific functions as the basis of the fee?



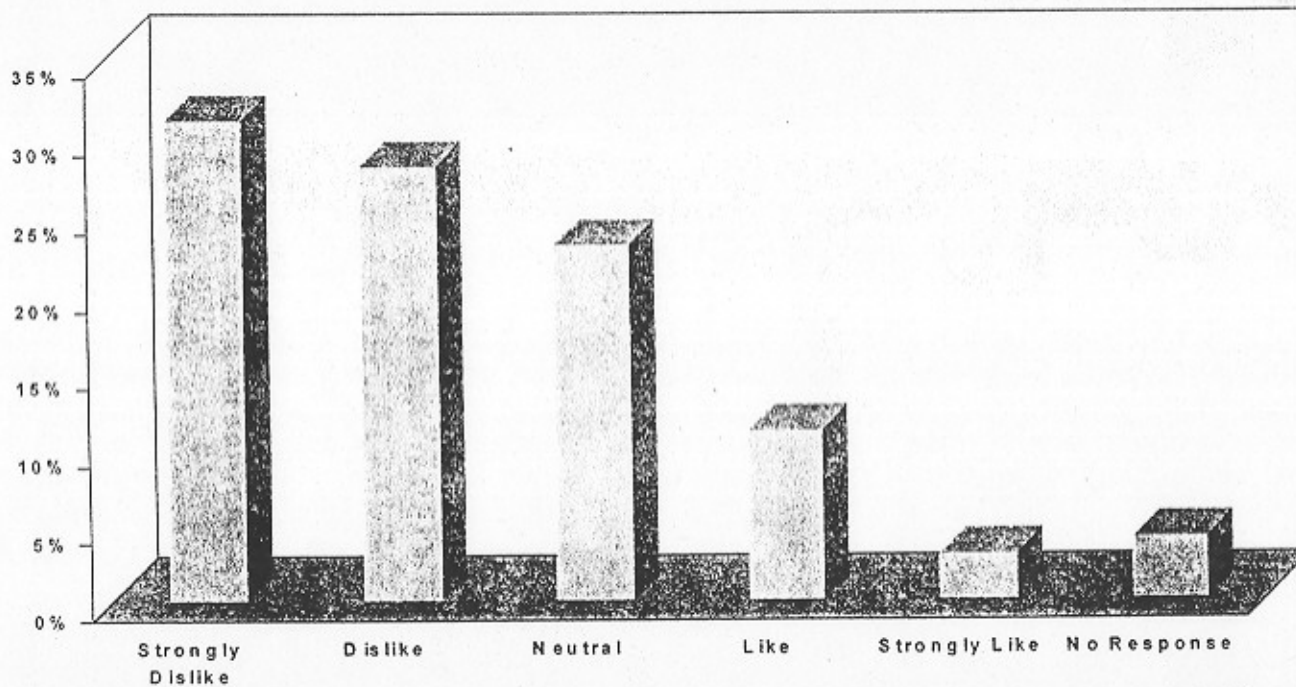
6) How do you feel about the concept of fees that are based on population?



7) How do you feel about having fees based on the number of utility connections?

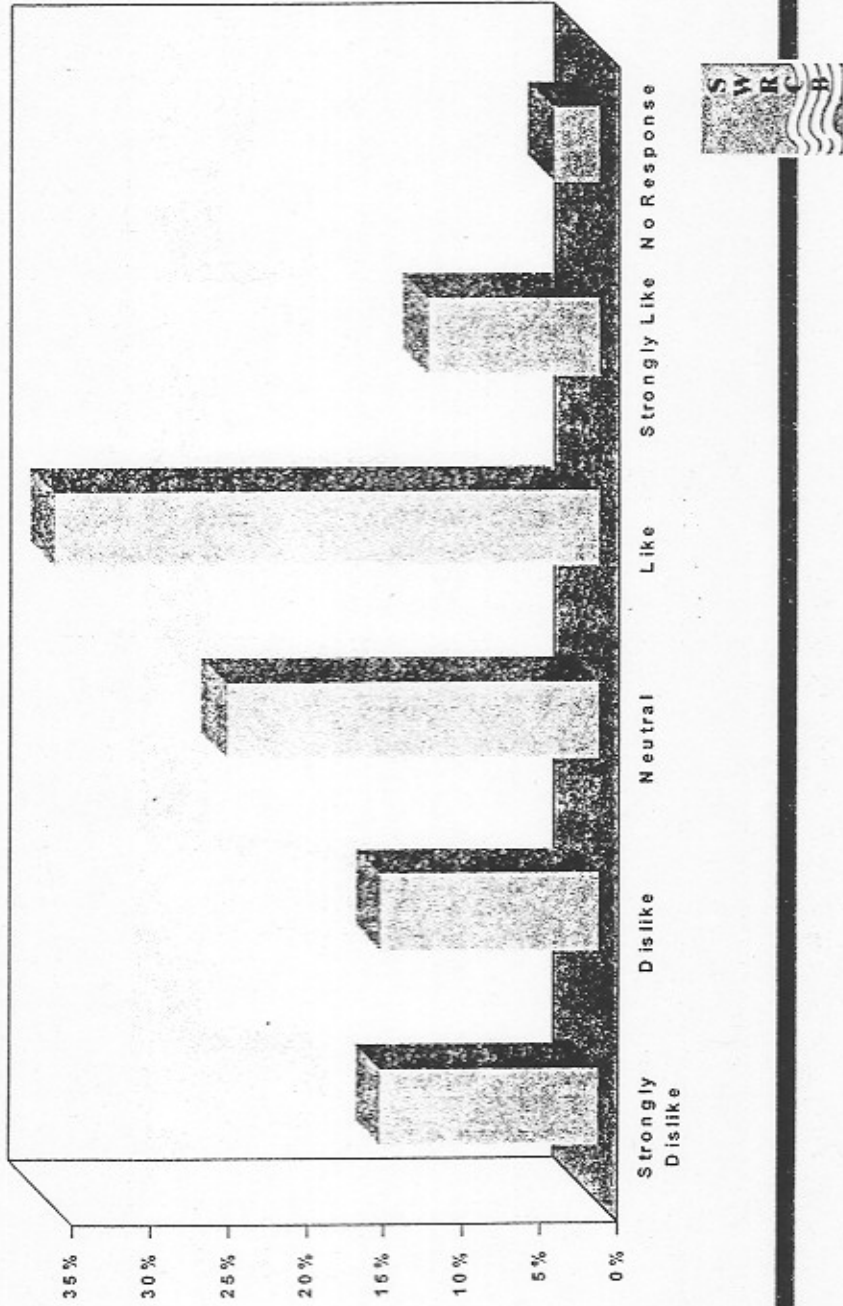


8) How do you feel about permit fees that are based on the land area for which the permit is issued?

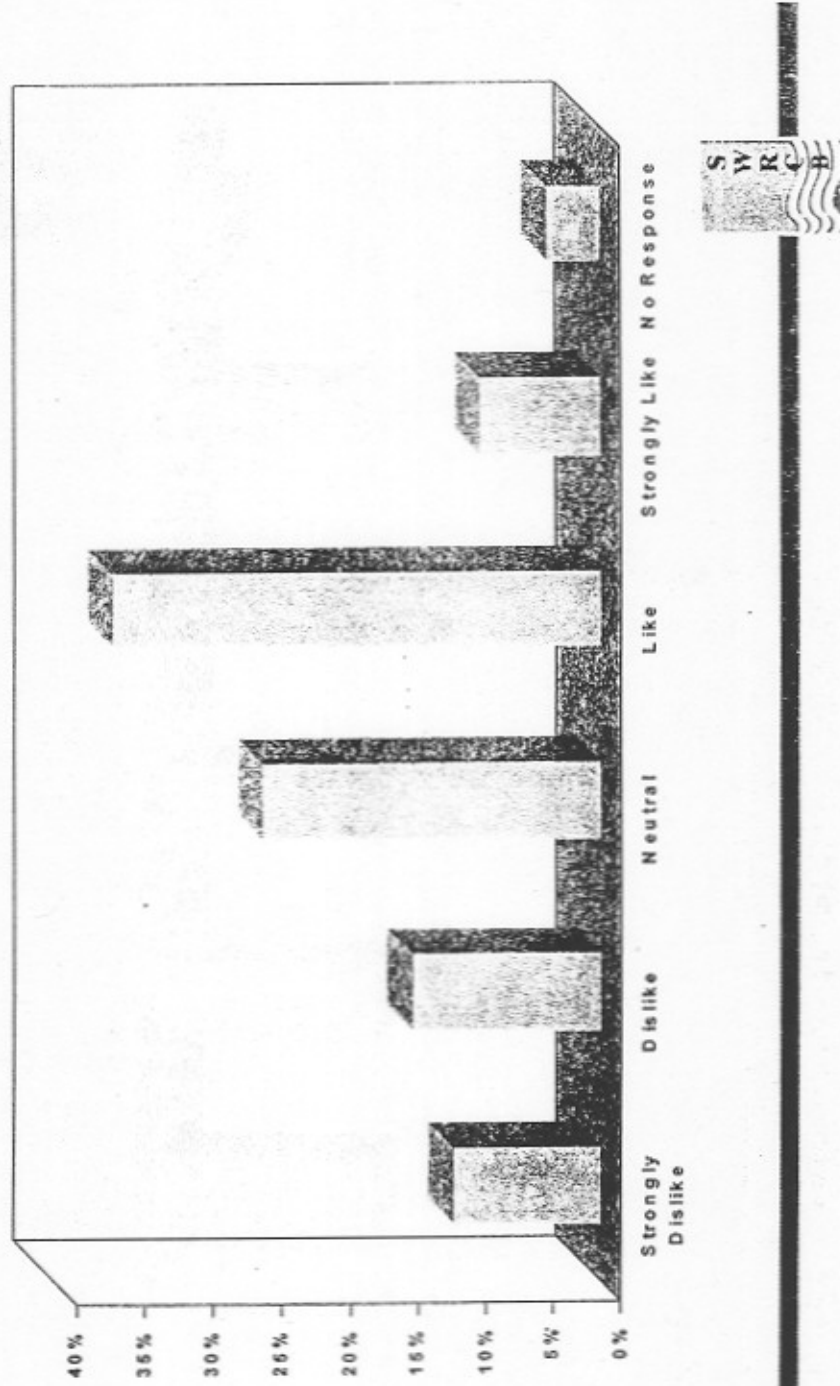




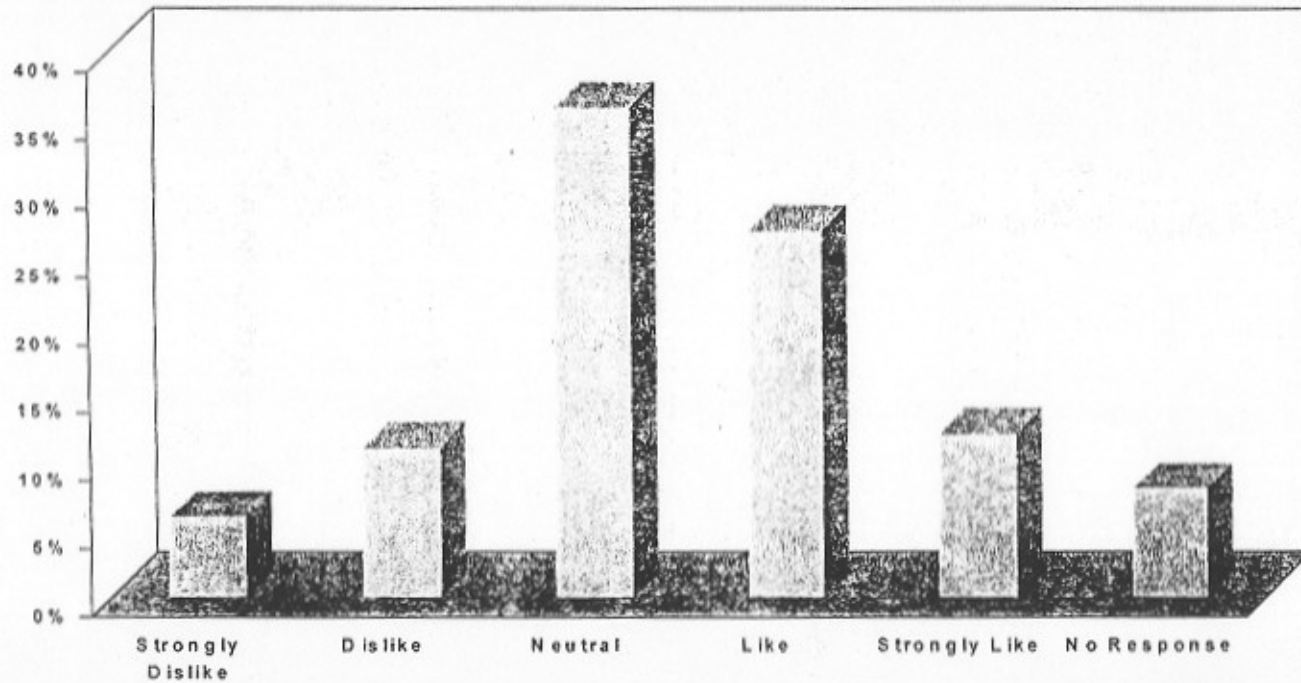
9) How do you feel about permit fees that are based on total wastewater treatment volume?



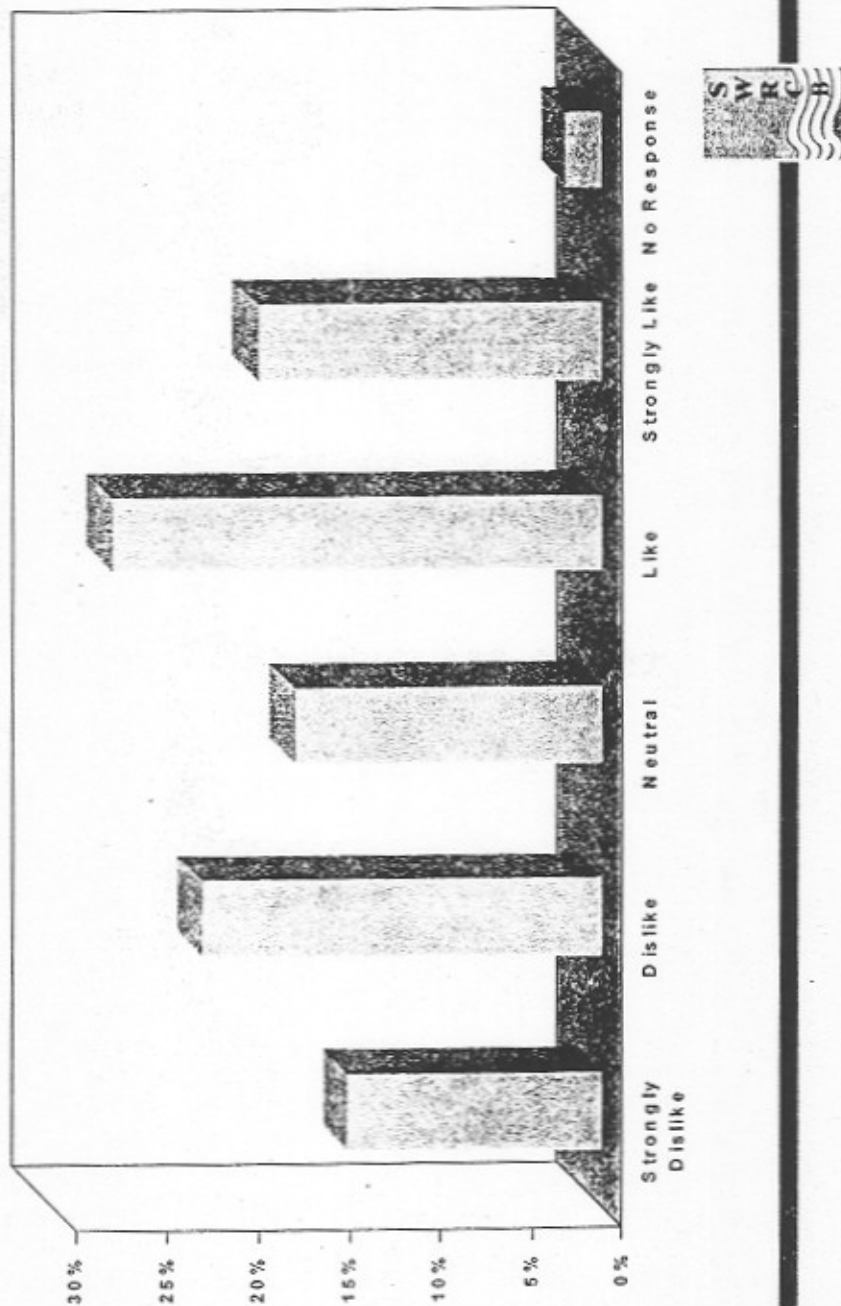
10) How do you feel about permit fees that are based on a flow or volume component?



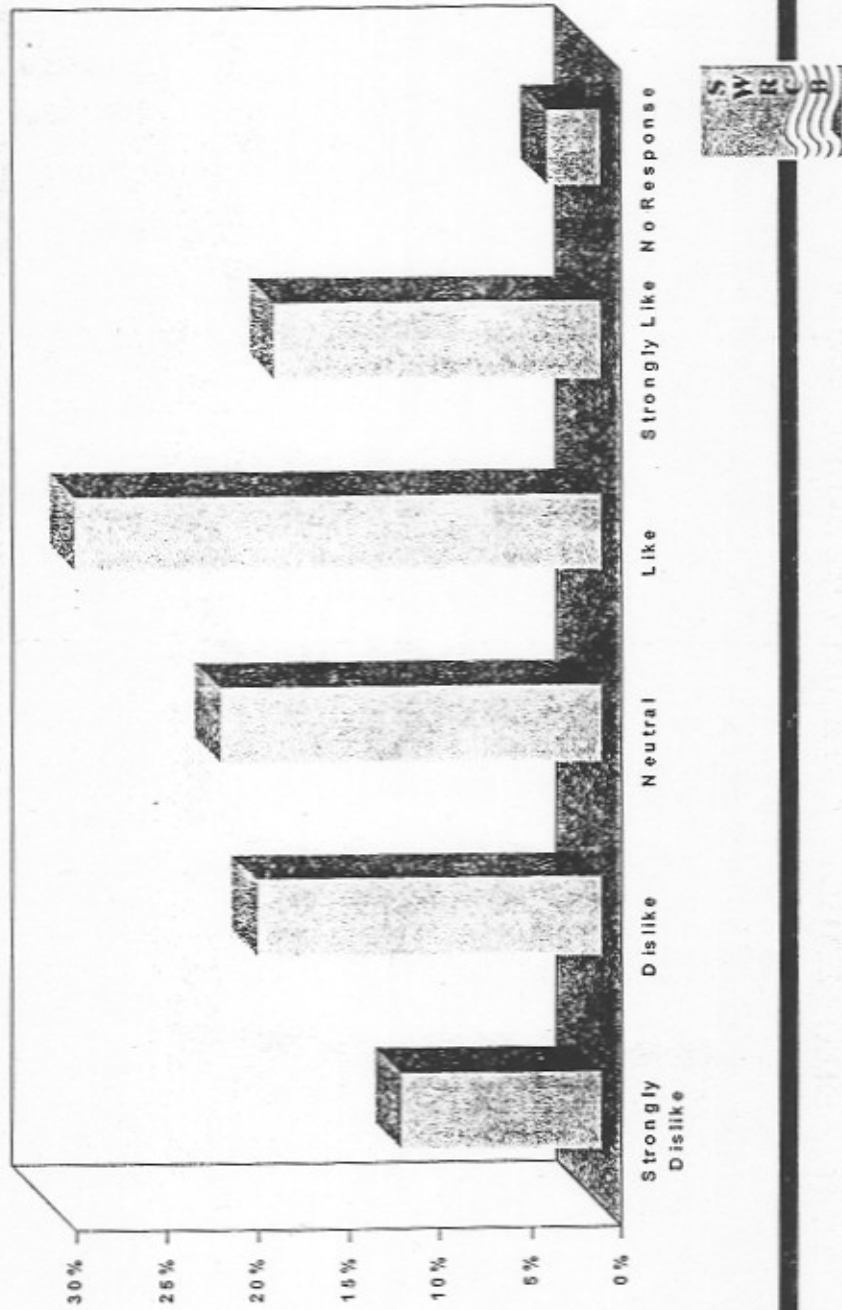
11) For confined animal facilities, how do you feel about permit fees that are based on the number of animals for which a permit is issued?



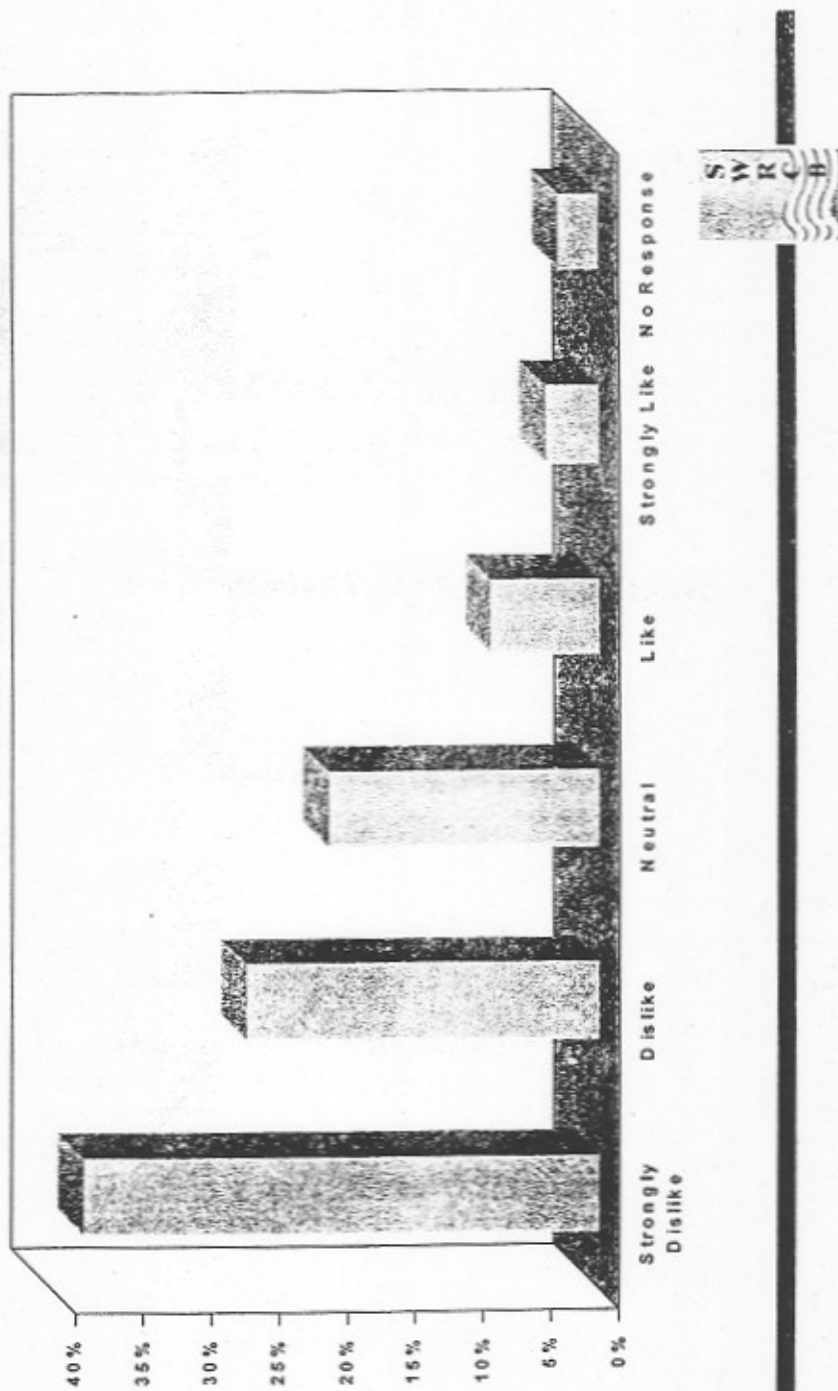
12) How do you feel about permit fees that are based on a discharge's threat to water quality?



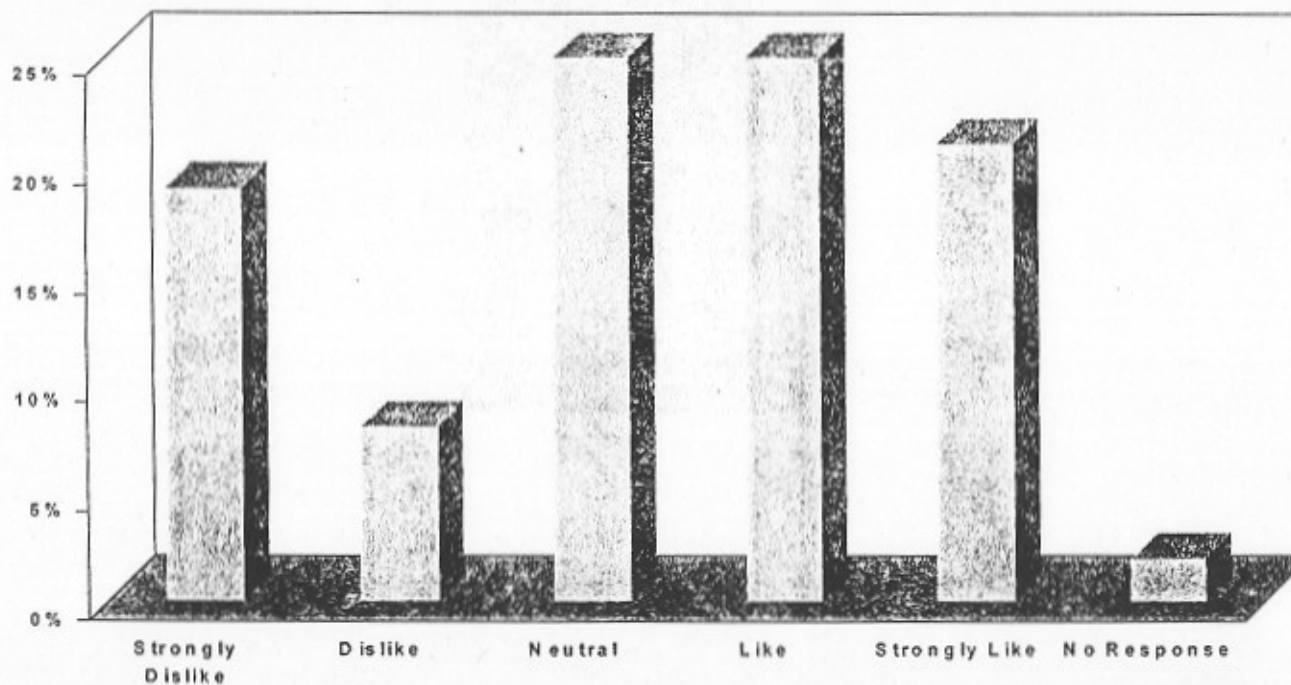
13) How do you feel about permit fees that are based on the number/type of pollutants in the discharge?



14) How do you feel about permit fees that are based on the size (annual revenue) of an industry?



15) How do you feel about a system of fees that are based on cost recovery where permit holders are billed for the actual costs?



***Appendix B***

***Focus Group Participants  
and Results***



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**State Water Resources Control Board**  
**Focus Group One**  
**June 13, 2000**

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*Focus Group Subject:* SWRCB Core Regulatory Programs Fee Structure Review

*Participants:* David Arrieta, David E. Bolland, Karen A. Keene, Marilyn Sarantis, Yvonne Hunter, Bobbi Larson, Pat Netsch, Valerie Neva

*Facilitators:* Farnum Alston, Jake Boomhouwer, Dave Schwartz

*Introduction:* Farnum explained the process and purpose of the meeting. Dave described the programs involved and the current fee schedule. Participants received written material on the information discussed.

*Survey Results:* Jake summarized the results of a random survey that was completed by approximately 120 participants. Focus group participants received a copy of the survey results.

*Discussion:*

- Highest priority is an equitable fee structure – It needs to be “cost based” with a fee cap that reflects costs.
- An equitable fee for cost of providing service – Identify who is not paying fees: stormwater sewer, land – point/non-point – assure that the fee burden is not all passed on to point source fee payers
- How to manage non-point source impact. It is a major contributor to pollution
- CAP compaction
- The key objective in any fee structure should be “how to make Water Quality better” ... not just generating fees. SWRCB does not have a vision for water quality across the state
- The need to use incentives to reduce pollution and get discharger participation
- Regional Water Boards and SWRCB do not have well trained staff; often quality of service is more important than the cost of fees to dischargers– our time is money - Good Science is missing from SWRCB and Regional Boards
- Keep it simple – whatever the fee system design
- Do not make it a “No polluter Pays” approach. It needs to be “fair share” – even the public is a discharger
- The current SWRCB is just taking the easy route to enforcement
- Board has no vision of water quality that is driving the fee program
- Question of quality of staff; Need some organizational improvements in regional boards and headquarters
- There is a Permit backlog and people are rushing permits through
- Equity issue
- We need a Quality Process – Reasonable Timelines/Turnaround
- There needs to be a “Systems” approach to a fee structure
- The State needs to “pony up” resources – there needs to be a willingness to pay for good science – It is missing now. The quality of Board services are low
- An incentive based water shed system is needed

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**State Water Resources Control Board**  
**Focus Group One**  
**June 13, 2000**

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- There is a need to look at the Federal direction vs the State needs and direction. The feds are driving too much of the approach. It is insensitive to our local needs
- The current system needs to deal with the equity issue – appropriate levels/categories
- Our real costs are in implementing the permit (arbitrary decisions by regions); involves legal and technical assistance and this costs us money
- The cost of permits is low compared to our other costs. If we had an effective system we would be willing to pay more as it would save us the other costs.
- Approach as a partnership/collaboration
- Fees System needs to be cost-based and simplified
- I said no in the survey on the COLA question but – if fee system and costs are reasonable and the service there then – Yes
- Fees need to be linked to real, reasonable Costs and SWRCB effectiveness
- Caps are too low in many cases; causes fee compaction (LA and Caltrans are examples)
- There must be a pledge/commitment by the Board to deal with the poor quality of the current programs and services if the fees are to be (supported) raised
- Separate the permit program from enforcement program in a fee structure
- No need to charge higher fees for violators – They are already penalized adequately under current system
- 401 Permit Process – just means extra work. Many of the permit requirements under this law that mean SWRCB review are minor issues. Duplication of effort (survey Federal/State activities)
- Forums like this are excellent and needed – excellent meeting
- Incentives – environmental impact
- Flow/Volume substitute for other more complex indicators of environmental impact
- A high standard of Water Quality should be the SWRCB goal – currently it is not. The fees seem to be the focus and just getting revenues
- Remove “revenue” incentives from the system
- Get rid of “Bounty Hunter Mentality”
- Set up a structure/process that goes after the real water quality source of the problem – not deep pockets
- Other sources of pollutants out there – don’t make us the surrogates
- Fixed Fees – predictability
- Variable Fees do not work for the discharger – argument factor – who is measuring what – also gets into efficiencies
- Longer term variable fees may be the way to go once the science is there
- Performance Measures for the program – what is happening in the water
- The Point/Nonpoint difference
- Local government fees based on cost (the state should follow the same guidelines)

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**State Water Resources Control Board  
Focus Group One  
June 13, 2000**

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- This type of meeting is critical to getting support for the fee restructuring
- Amnesty – Safe Harbor Program - We have a problem that we want to fix – how can we come into compliance – revolving fund to assist
- Cost Recovery – Our concern is that it becomes self perpetuating – a police approach
- General funded as opposed to fee funded
- A system that is Watershed Based

**Pros of Meeting**

- Open Discussion
- Size of Group
- Materials were helpful (better to have before the meeting)
- Subject Matter
- Facilitation
- Facilitators very knowledgeable about

**Suggestions**

- Low fat doughnuts / Coffee
- SWRCB needs to give us cost data
- Administrative staff not just financial staff
- Done this before – will there be follow-up

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**State Water Resources Control Board**  
**Focus Group Two**  
**June 14, 2000**

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*Focus Group Subject:* SWRCB Core Regulatory Programs Fee Structure Review

*Participants:* Pat Blacklock, Gary Conover, Tess Dunham, Brad Luckey, Kathy Mannion, Paul Martin, Matt Tennis

*Facilitators:* Farnum Alston, Jake Boomhouwer, Dave Schwartz

*Introduction:* Farnum explained the process and purpose of the meeting. Dave described the programs involved and the current fee schedule. Participants received written material on the information discussed.

*Survey Results:* Jake summarized the results of a random survey that was completed by approximately 120 participants. Focus group participants received a copy of the survey results.

*Issues/Questions:*

- ❖ Should Agriculture be exempt from fees?
- ❖ Agriculture is impacted by the following SWRCB program components
  - 401
  - Non-15
- ❖ Equity
  - Is there equity in Point and Nonpoint
  - Equity across all programs
  - Fee compaction
- ❖ California Association of Nurserymen should be included in future focus groups
- ❖ 1000 Animal unit an issue; particularly in California. It is a federal standard that disadvantages Cal Agri due to the large size of Cal Agri operations
- ❖ Financial aid is needed -
  - A State Revolving Fund – low interest loans ?
- ❖ About 2100 Grade A Dairies – 50% are 1000 animal unit operations
- ❖ Mismanagement and accidents are issues in this field not intentional program abuse

*Discussion:*

- What is the Board spending the current fees; how is the program being administered; what is it costing to run the program and is it effective ?
- Fees need to be tied to costs
- Water quality needs to be the SWRCB program driver
- Need for additional fees may be different than the need to recover costs
- Needs assessment is a big part of any fee program

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**State Water Resources Control Board**  
**Focus Group Two**  
**June 14, 2000**

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- Agriculture (Dairies) looking for "safe harbors"
  - Keep costs to a necessary minimum
  - Immune from additional prosecution
  - Yet meeting safe water act requirements
  - Need less and less enforcement over time
  - Bigger is better – Agri Dairy is modern industry
  - More and more larger operations in the future
  - Would you support an annual fee if it gave you a safe harbor. YES In theory it makes sense to have a yearly fee if it provides added value and a safe harbor
  - Fairness and compaction – does a 150 unit pay as much as a larger unit?
  - Definition of confined units
- Concerned about the "Potential" Issue being imposed by the Feds to California because of regional differences
- Size not necessarily correlated to problems, In fact size may mean fewer problems.
- CAFO – Feedlot numbers have dwindled / 20 +/-
  - Imperial Valley – processing
  - They would be resistant to annual fees as they are marginal operations
- Range Land Industry – (RPWQM Plan ) -1 million acres in program now
  - Water quality management plan has been self initiated
  - One more fee may push them over the edge
- Poultry
  - Primary concerns – safe harbor – no need to get into a program – NPDES?
  - Looking for an exemption when an entity is not a discharger
  - They are definitely not dischargers
- Do not want to develop the same type of fee program for all geographic areas - distribution of Dairy industry is important – Transportation costs / freshness of product are issues
- Production Agriculture
  - Dry feed operations (484K acres in prod)
  - TMDL concern
  - No ground water – no real issues
  - Most of the "stuff" is not currently applicable
  - Trend seem to be to regulate agriculture out of business
  - Not educating the public enough as to where the food comes from
  - Tremendous difference in geographic issues across the state

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**State Water Resources Control Board  
Focus Group Two  
June 14, 2000**

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- Production/Irrigation Agriculture
  - Much time, effort and money has gone into Point Source and now all eyes are now on Non-Point Source
  - Non-Point - Difficult area to get your hands around
  - Non-Point Source is universal – land management is the key not regulation
  - Funds (loans and grants) are drying up for the Non-Point Source
  - Quite of few water bodies are listed but not monitored
- Non-Point Source pollution is a public (everyone's) problem
- Application of COLA
  - What about an Agri cola (A "Reverse" COLA)
  - Should be changed to CPI not COLA
- Core SWRCB Fees
  - Current Board Structure segregates fees by program
  - Many overlaps in SWRCB programs – Lack of cost efficiency
- "Fine" Strategy is currently negotiated at the Regional Board level
- Fee caps
  - Yes – There should absolutely be a CAP
  - Hard to say to raise it now with out cost data
  - Show me the cost benefit
  - Why fund the whole watch dog program – we are making cops out of regulators
  - Agriculture is not able to pass on the cost of fees as other industries do
- Cost Recovery
  - There is a problem with this as it leads to a "Police" approach issue
- Agri / SWRCB relationship needs to be collaborative
- We need Incentives to protect water quality...
  - If I do a good job, do I get money back
  - Lower fees for good compliance
  - Dollars and funds to support to Non-Point Source programs
- Public Perceptions – the newspaper is driving this – is negative against Agri
- What is the problem with the existing system and what is the question we are trying to address?
- We don't want the Feds to take over – Solution is to make the State program a viable one

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**State Water Resources Control Board**  
**Focus Group Three**  
**June 13, 2000**

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*Focus Group Subject:* SWRCB Core Regulatory Programs Fee Structure Review

*Participants:* Melinda Marks, Armand Ruby, Linda Sheehan, Chuck White

*Facilitators:* Farnum Alston, Jake Boomhouwer, Dave Schwartz

*Introduction:* Farnum A, explained the process, purpose of the meeting and led discussion.

Dave S. described the SWRCB Core programs and the current fee schedule.

Participants received written material on the information discussed, the survey and a list of participants at all sessions.

*Survey Results:* Jake B. summarized the results of a random survey that was completed by approximately 120 participants. Focus group participants received a copy of the survey results graphics.

*Issues/Questions*

- ❖ Financial support is needed to assure economic viability and educational efforts. Funding support has been going down
- ❖ Equity - The need to address the Co-Grantee issue / LA and CalTrans for example should pay additional fees based on their area-wide permits
- ❖ There is a critical need for cost data. How can we develop a fee strategy with out cost data to tell us what real costs are now and what they will be under different options
- ❖ Current fees are not based on "cost" now. What are they based on?
- ❖ Inconsistent Board regulatory actions at all levels and at regional levels – very different enforcement and support
- ❖ Water code was intentionally inconsistent to address specific geographic issues in the differences in the water sheds and different environmental needs
- ❖ \$1 fee Per Capita to cover non-point source such as public discharges, stormwater, agri etc. costs (include on bill?)
- ❖ We need to define "Who are the polluters" – It is everyone at some level - the public also?
- ❖ Not enough guidance at State level on implementation
- ❖ The current level of support is low quality – level of science is poor

*Discussion:*

- We need to be very clear about the actual program costs (current and future) and components; who is paying for what and what are we getting for our licenses and fees
- Fee for service – We need some equitable services for the fees paid
- There are current inequities in the system – Major Regional differences
- Stormwater Managers in the Bay Area get a lot of support and service from the Board, while managers in the Central Valley are ignored (pay for "silence")

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**State Water Resources Control Board**  
**Focus Group Three**  
**June 13, 2000**

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- Cost of performance
- Reports sit on a shelf – no feedback or follow-up to us as licensed organizations in the Central Valley
- There is a need for a collaborative relationship between licensees and Board – now it is adversarial.
- One way to translate a fee (CAP = PY) is to translate it into a personnel year and then measure the level of “support” as a PY?
- Need to recognize that the historical fees were driven by political whims not logic
- Fees in a perfect world versus reality
- Some of the costs need to be paid by the citizens – if polluter pays we are all polluters
- Under a fee system there should be no one class for all dischargers – divided into categories (landfill, TMDL, etc.)
- Break down within the classes of waste – sliding scale fee for “Threat to Water Quality”
- Current system does not make sense
- Cover cost of Program
- Value for fee
- There is a need for a strong program that protects water quality as the key objective
- We require assistance and support and should get it for the fees we pay
- Permit structure needs to be straight forward so people will know what they are paying for – It also needs to be able to be communicated to the legislature and the public
- Flat Fee for 5 years may be politically correct way to use a COLA
- We suggest a CIP / COLA – with a 5 year adjustment
- There is a need to make a “Program case” for fees – costs need to be justified on a level of service basis
- Permit costs should address “Threat” issue
- Costs need to reflect the amount of time of it takes to provide certain services
- A basic cost per type of discharge is another approach
- Have a baseline set of costs (reports) and then additional fees based on enforcement actions
- Cost Recovery – add possible clean up costs and abatement
- The current basic fee is too low
- There is a need to use incentives
- Violations are effective for public agencies – name in the paper
- How do permit fees affect violations (budget issues)
- Need some sort of enforcement costs built into fee
- Have the CAP apply to the basic Permit Fee, not on variable cost aspects
- Department of Toxics – permit activity fee
- Increase in fee would be ok - if there are also clearly defined program costs tied to the increase and additional support / staffing to provide needed level of services



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**State Water Resources Control Board**  
**Focus Group Three**  
**June 13, 2000**

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- Have a sliding scale for different water bodies
  - Receiving body
  - Volume of discharges
  - Concentration of discharges
- What does the current program cost the State – that should be what the fee should be based on – if the costs reflect reasonable costs
- Cost linked to Environmental Impact
- The \$10,000 cap is not adequate in many areas (SF, LA, etc) for some clients. Getting some the services required
- The \$10,000 cap is not adequate in many areas (SF, LA, etc) for some clients. Getting some the services required
- Start up costs – should the public pay for development costs of new programs – shared or general fund
- Fees on Watershed basis
- Different classes – point source – non-point source

**Pros of Meeting**

- Survey
- Built on discussion
- Facilitation was excellent
- Process to get people to talk was good – going around room
- Materials
- Numbers of people / representation

**Suggestions**

- Critical need to get Cost Data
- Highlight key issues in advance for next meeting

***Appendix C***

***Estimated Revenue of  
Core Regulatory Program  
Fee Structure Alternatives***

**Alternative #1**  
**Existing Core Regulatory Program Fee Revenue,**  
**1999-2000 Actual Billings**

Program / Rating	Fee Level	No. Fee Payers	Fee Revenue
<b>NPDES Permit</b>			
I-a	10,000	185	\$1,850,000
I-b	7,000	20	140,000
I-c	5,500	58	319,000
II-a	4,000	90	360,000
II-b	2,000	247	494,000
II-c	1,200	89	106,800
III-a	1,000	15	15,000
III-b	750	80	60,000
III-c	400	169	67,600
Areawide Stormwater	10,000	17	170,000
Areawide Stormwater	5,000	9	45,000
Ind./Constr. Stormwater	500	2,798	1,399,000
Ind./Constr. Stormwater	250	10,803	2,700,750
General Permits	250	1,241	310,250
Subtotal		15,821	8,037,400
<b>Non-Chapter 15 WDR</b>			
I-a	10,000	28	280,000
I-b	5,500	21	115,500
I-c	3,000	16	48,000
II-a	2,000	104	208,000
II-b	1,200	658	789,600
II-c	900	677	609,300
III-a	750	14	10,500
III-b	400	358	143,200
III-c	200	1,332	266,400
General Permits	250	484	121,000
Subtotal		3,692	2,591,500
<b>Chapter 15 WDR</b>			
I-a	10,000	44	440,000
I-b	7,500	65	487,500
I-c	6,000	109	654,000
II-a	5,000	30	150,000
II-b	4,000	165	660,000
II-c	3,000	130	390,000
III-a	2,000	20	40,000
III-b	1,500	109	163,500
III-c	750	181	135,750
General Permits	250	9	2,250
Subtotal		862	3,123,000
<b>Section 401 Certifications</b>			
Certifications Issued	10,000	32	320,000
Certifications Waived	500	1,070	535,000
Subtotal		1,102	855,000
<b>Total</b>		<b>21,477</b>	<b>\$14,606,900</b>

**Alternative #2**  
**Estimated Core Regulatory Program Fee Revenue,**  
**Based on 1999-2000 Actual Dischargers**

Program / Rating	Fee Level	No. Fee Payers	Fee Revenue
<b>NPDES Permit</b>			
I-a	20,000	185	\$3,700,000
I-b	14,000	20	280,000
I-c	11,000	58	638,000
II-a	8,000	90	720,000
II-b	4,000	247	988,000
II-c	2,400	89	213,600
III-a	2,000	15	30,000
III-b	1,500	80	120,000
III-c	800	169	135,200
Areawide Stormwater	20,000	17	340,000
Areawide Stormwater	10,000	9	90,000
Ind./Constr. Stormwater	1,000	2,798	2,798,000
Ind./Constr. Stormwater	500	10,803	5,401,500
General Permits	500	1,241	620,500
Subtotal		15,821	16,074,800
<b>Non-Chapter 15 WDR</b>			
I-a	20,000	28	560,000
I-b	11,000	21	231,000
I-c	6,000	16	96,000
II-a	4,000	104	416,000
II-b	2,400	658	1,579,200
II-c	1,800	677	1,218,600
III-a	1,500	14	21,000
III-b	800	358	286,400
III-c	400	1,332	532,800
General Permits	500	484	242,000
Subtotal		3,692	5,183,000
<b>Chapter 15 WDR</b>			
I-a	20,000	44	880,000
I-b	15,000	65	975,000
I-c	12,000	109	1,308,000
II-a	10,000	30	300,000
II-b	8,000	165	1,320,000
II-c	6,000	130	780,000
III-a	4,000	20	80,000
III-b	3,000	109	327,000
III-c	1,500	181	271,500
General Permits	500	9	4,500
Subtotal		862	6,246,000
<b>Section 401 Certifications</b>			
Certifications Issued	20,000	32	640,000
Certifications Waived	1,000	1,070	1,070,000
Subtotal		1,102	1,710,000
<b>Total</b>		<b>21,477</b>	<b>\$29,213,800</b>

**Alternative #3**  
**Estimated Core Regulatory Program Fee Revenue,**  
**Based on 1999-2000 Projected Dischargers**

Program / Rating	Fee Level	No. Fee Payers	Fee Revenue
<b>NPDES Permit</b>			
I-a	20,000	185	\$3,700,000
I-b	14,000	20	280,000
I-c	11,000	58	638,000
II-a	8,000	90	720,000
II-b	4,000	1,027	4,108,000
II-c	2,400	89	213,600
III-a	2,000	15	30,000
III-b	1,500	80	120,000
III-c	800	169	135,200
MS4 (>1,000k pop.)	40,000	9	360,000
MS4 (500k<1,000k pop.)	30,000	2	60,000
MS4 (200k<500k pop.)	20,000	6	120,000
MS4 (100k<200k pop.)	15,000	4	60,000
MS4 (<100k pop.)	10,000	5	50,000
Ind./Constr. Stormwater	1,000	2,798	2,798,000
Ind./Constr. Stormwater	500	10,803	5,401,500
General Permits	500	1,241	620,500
Co-permittee Surcharge	varies	291	878,502
Subtotal		16,892	20,293,302
<b>Non-Chapter 15 WDR</b>			
I-a	20,000	28	560,000
I-b	11,000	21	231,000
I-c	6,000	16	96,000
II-a	4,000	104	416,000
II-b	2,400	658	1,579,200
II-c	1,800	677	1,218,600
III-a	1,500	14	21,000
III-b	800	358	286,400
III-c	400	1,332	532,800
General Permits	500	484	242,000
Subtotal		3,692	5,183,000
<b>Chapter 15 WDR</b>			
I-a	20,000	44	880,000
I-b	15,000	65	975,000
I-c	12,000	109	1,308,000
II-a	10,000	30	300,000
II-b	8,000	165	1,320,000
II-c	6,000	130	780,000
III-a	4,000	20	80,000
III-b	3,000	109	327,000
III-c	1,500	181	271,500
General Permits	500	9	4,500
Subtotal		862	6,246,000
<b>Section 401 Certifications</b>			
Certifications Issued	20,000	32	640,000
Certifications Waived	1,000	1,070	1,070,000
Subtotal		1,102	1,710,000
<b>Late Fees &amp; Charges</b>	250	1,127	281,850
<b>Total</b>		<b>23,675</b>	<b>\$33,432,302</b>

**Alternative #4**  
**Estimated Core Regulatory Program Fee Revenue, Based on 1999-2000 Projected Dischargers**

Program / Rating	Number of Payers			Ren.	One-Time Charges				Ann. Adj. Factor	
	New	Mod.	Ren.		Application		Modification			
					Fee	Revenue	Fee	Revenue		
<b>NPDES Permit</b>										
Wastewater I-a (>25 mgd)	0	0	0	57	10,000	0	7,500	0	1.00%	
Wastewater I-a (5-25 mgd)	0	0	0	78	10,000	0	7,500	0	1.00%	
Wastewater I-a (<5 mgd)	0	0	0	114	10,000	0	7,500	0	1.00%	
Wastewater I-b (>25 mgd)	0	0	0	0	10,000	0	7,500	0	1.00%	
Wastewater I-b (5-25 mgd)	0	0	0	2	10,000	0	7,500	0	1.00%	
Wastewater I-b (<5 mgd)	0	0	0	15	10,000	0	7,500	0	1.00%	
Wastewater I-c (>25 mgd)	0	0	0	0	10,000	0	7,500	0	1.00%	
Wastewater I-c (5-25 mgd)	0	0	0	1	10,000	0	7,500	0	1.00%	
Wastewater I-c (<5 mgd)	0	0	0	8	10,000	0	7,500	0	1.00%	
Wastewater II-a (>25 mgd)	0	0	0	3	5,000	0	3,750	0	1.00%	
Wastewater II-a (5-25 mgd)	0	0	0	21	5,000	0	3,750	0	1.00%	
Wastewater II-a (<5 mgd)	0	0	0	92	5,000	0	3,750	0	1.00%	
Wastewater II-b (>25 mgd)	0	0	0	6	5,000	0	3,750	0	1.00%	
Wastewater II-b (5-25 mgd)	0	0	0	13	5,000	0	3,750	0	1.00%	
Wastewater II-b (<5 mgd)	0	3	444	0	5,000	0	3,750	0	1.00%	
Wastewater II-c (>25 mgd)	0	0	0	0	5,000	0	3,750	0	1.00%	
Wastewater II-c (5-25 mgd)	0	0	0	11	5,000	0	3,750	0	1.00%	
Wastewater II-c (<5 mgd)	0	129	478	0	5,000	0	3,750	0	1.00%	
Wastewater III-a (>25 mgd)	0	0	0	0	2,000	0	1,500	0	1.00%	
Wastewater III-a (5-25 mgd)	0	0	0	1	2,000	0	1,500	0	1.00%	
Wastewater III-a (<5 mgd)	0	0	206	0	2,000	0	1,500	0	1.00%	
Wastewater III-b (>25 mgd)	0	0	0	1	2,000	0	1,500	0	1.00%	
Wastewater III-b (5-25 mgd)	0	0	0	3	2,000	0	1,500	0	1.00%	
Wastewater III-b (<5 mgd)	0	0	0	116	2,000	0	1,500	0	1.00%	
Wastewater III-c (>25 mgd)	0	0	0	5	2,000	0	1,500	0	1.00%	
Wastewater III-c (5-25 mgd)	0	0	30	0	2,000	0	1,500	0	1.00%	
Wastewater III-c (<5 mgd)	0	11	635	0	2,000	0	1,500	0	1.00%	
MS4 (>1,000K pop.)	0	0	0	10	20,000	0	15,000	0	1.00%	
MS4 (500k<1,000K pop.)	0	0	0	2	15,000	0	11,250	0	1.00%	
MS4 (200k<500K pop.)	0	0	0	5	10,000	0	7,500	0	1.00%	
MS4 (100k<200K pop.)	0	0	0	4	7,500	0	5,625	0	1.00%	
MS4 (<100K pop.)	0	0	0	5	5,000	0	3,750	0	1.00%	
Co-permittees	0	291	0	0	varies	0	varies	0	1.00%	
Ind./Constr. Stormwater	0	0	0	2,798	2,000	0	1,500	0	1.00%	
Ind./Constr. Stormwater	0	0	0	10,803	1,000	0	750	0	1.00%	
Large CAFO (new)	780	0	0	780	2,000	1,560,000	1,500	1,170,000	1.00%	
General Permits	0	0	0	1,241	1,000	0	750	0	1.00%	
Subtotal	780	434	17,988			1,560,000		1,170,000		

**Alternative #4**  
**Estimated Core Regulatory Program Fee Revenue, Based on 1999-2000 Projected Dischargers**

Program / Rating	Number of Payers			One-Time Charges				Ann. Adj. Factor
	New	Mod.	Ren.	Application		Modification		
				Fee	Revenue	Fee	Revenue	
<b>Section 401 Certifications</b>								
Certifications Issued	0	0	32	5,000	0	3,750	0	1.00%
Certifications Waived	0	0	1,070	1,000	0	750	0	1.00%
<b>Subtotal</b>	<b>0</b>	<b>0</b>	<b>1,102</b>		<b>0</b>		<b>0</b>	
<b>Non-Chapter 15 WDR</b>								
Wastewater I-a (>25 mgd)	0	0	4	10,000	0	7,500	0	1.00%
Wastewater I-a (5-25 mgd)	0	0	13	10,000	0	7,500	0	1.00%
Wastewater I-a (<5 mgd)	0	0	34	10,000	0	7,500	0	1.00%
Wastewater I-b (>25 mgd)	0	0	0	10,000	0	7,500	0	1.00%
Wastewater I-b (5-25 mgd)	0	0	4	10,000	0	7,500	0	1.00%
Wastewater I-b (<5 mgd)	0	0	24	10,000	0	7,500	0	1.00%
Wastewater I-c (>25 mgd)	0	0	2	10,000	0	7,500	0	1.00%
Wastewater I-c (5-25 mgd)	0	0	0	10,000	0	7,500	0	1.00%
Wastewater I-c (<5 mgd)	0	153	265	10,000	0	7,500	0	1.00%
Wastewater II-a (>25 mgd)	0	0	2	5,000	0	3,750	0	1.00%
Wastewater II-a (5-25 mgd)	0	0	12	5,000	0	3,750	0	1.00%
Wastewater II-a (<5 mgd)	0	5	114	5,000	0	3,750	0	1.00%
Wastewater II-b (>25 mgd)	0	0	1	5,000	0	3,750	0	1.00%
Wastewater II-b (5-25 mgd)	0	0	6	5,000	0	3,750	0	1.00%
Wastewater II-b (<5 mgd)	0	21	874	5,000	0	3,750	0	1.00%
Wastewater II-c (>25 mgd)	0	0	0	5,000	0	3,750	0	1.00%
Wastewater II-c (5-25 mgd)	0	0	4	5,000	0	3,750	0	1.00%
Wastewater II-c (<5 mgd)	0	66	427	5,000	0	3,750	0	1.00%
Wastewater III-a (>25 mgd)	0	0	0	2,000	0	1,500	0	1.00%
Wastewater III-a (5-25 mgd)	0	0	1	2,000	0	1,500	0	1.00%
Wastewater III-a (<5 mgd)	0	0	24	2,000	0	1,500	0	1.00%
Wastewater III-b (>25 mgd)	0	0	0	2,000	0	1,500	0	1.00%
Wastewater III-b (5-25 mgd)	0	0	3	2,000	0	1,500	0	1.00%
Wastewater III-b (<5 mgd)	0	3	427	2,000	0	1,500	0	1.00%
Wastewater III-c (>25 mgd)	0	0	2	2,000	0	1,500	0	1.00%
Wastewater III-c (5-25 mgd)	0	0	9	2,000	0	1,500	0	1.00%
Wastewater III-c (<5 mgd)	0	39	1,356	2,000	0	1,500	0	1.00%
<b>General Permits</b>								
	0	0	484	1,000	0	750	0	1.00%
<b>Subtotal</b>	<b>0</b>	<b>287</b>	<b>4,092</b>		<b>0</b>		<b>0</b>	

**Alternative #4**  
**Estimated Core Regulatory Program Fee Revenue, Based on 1999-2000 Projected Dischargers**

Program / Rating	Number of Payers			One-Time Charges				Ann. Adj. Factor
	New	Mod.	Ren.	Application		Modification		
				Fee	Revenue	Fee	Revenue	
<b>Chapter 15 WDR</b>								
Wastewater I-a (>25 mgd)	0	0	0	10,000	0	7,500	0	1.00%
Wastewater I-a (5-25 mgd)	0	0	1	10,000	0	7,500	0	1.00%
Wastewater I-a (<5 mgd)	0	0	84	10,000	0	7,500	0	1.00%
Wastewater I-b (>25 mgd)	0	0	0	10,000	0	7,500	0	1.00%
Wastewater I-b (5-25 mgd)	0	0	0	10,000	0	7,500	0	1.00%
Wastewater I-b (<5 mgd)	0	0	180	10,000	0	7,500	0	1.00%
Wastewater I-c (>25 mgd)	0	0	0	10,000	0	7,500	0	1.00%
Wastewater I-c (5-25 mgd)	0	0	0	10,000	0	7,500	0	1.00%
Wastewater I-c (<5 mgd)	0	0	4	10,000	0	7,500	0	1.00%
Wastewater II-a (>25 mgd)	0	0	0	5,000	0	3,750	0	1.00%
Wastewater II-a (5-25 mgd)	0	0	0	5,000	0	3,750	0	1.00%
Wastewater II-a (5 mgd)	0	0	48	5,000	0	3,750	0	1.00%
Wastewater II-b (>25 mgd)	0	0	1	5,000	0	3,750	0	1.00%
Wastewater II-b (5-25 mgd)	0	0	0	5,000	0	3,750	0	1.00%
Wastewater II-b (<5 mgd)	0	0	294	5,000	0	3,750	0	1.00%
Wastewater II-c (>25 mgd)	0	0	0	5,000	0	3,750	0	1.00%
Wastewater II-c (5-25 mgd)	0	0	0	5,000	0	3,750	0	1.00%
Wastewater II-c (<5 mgd)	0	0	31	5,000	0	3,750	0	1.00%
Wastewater III-a (>25 mgd)	0	0	0	2,000	0	1,500	0	1.00%
Wastewater III-a (5-25 mgd)	0	0	0	2,000	0	1,500	0	1.00%
Wastewater III-a (<5 mgd)	0	0	22	2,000	0	1,500	0	1.00%
Wastewater III-b (>25 mgd)	0	0	0	2,000	0	1,500	0	1.00%
Wastewater III-b (5-25 mgd)	0	0	0	2,000	0	1,500	0	1.00%
Wastewater III-b (<5 mgd)	0	0	192	2,000	0	1,500	0	1.00%
Wastewater III-c (>25 mgd)	0	0	0	2,000	0	1,500	0	1.00%
Wastewater III-c (5-25 mgd)	0	0	0	2,000	0	1,500	0	1.00%
Wastewater III-c (<5 mgd)	0	0	225	2,000	0	1,500	0	1.00%
Landfill (w/o liners)	0	269	269	5,000	0	3,750	0	1.00%
Landfill (w/ liners)	0	30	30	5,000	0	3,750	0	1.00%
General Permits	0	0	9	1,000	0	750	0	1.00%
Subtotal	0	299	1,390		0		0	
<b>Late Fees &amp; Charges</b>								
<b>Total</b>	<b>780</b>	<b>1,020</b>	<b>24,572</b>		<b>1,560,000</b>		<b>1,170,000</b>	



**Alternative #4**  
**Estimated Core Regulatory Program Fee Revenue, Based on 1999-2000 Projected Dischargers**

Program / Rating	Number of Payers			Flow/Volume			Annual Charges			Compliance		
	New	Mod.	Ren.	Fee	Revenue	Risk	Fee	Revenue	Fee	Revenue		
											Fee	Revenue
<b>NPDES Permit</b>												
Wastewater I-a (>25 mgd)	0	0	57	30,000	1,710,000	10,000	10,000	570,000	7,500	427,500		
Wastewater I-a (5-25 mgd)	0	0	78	15,000	1,170,000	10,000	10,000	780,000	7,500	585,000		
Wastewater I-a (<5 mgd)	0	0	114	2,500	285,000	10,000	10,000	1,140,000	7,500	855,000		
Wastewater I-b (>25 mgd)	0	0	0	30,000	0	10,000	10,000	0	5,000	0		
Wastewater I-b (5-25 mgd)	0	0	2	15,000	30,000	10,000	10,000	20,000	5,000	10,000		
Wastewater I-b (<5 mgd)	0	0	15	2,500	37,500	10,000	10,000	150,000	5,000	75,000		
Wastewater I-c (>25 mgd)	0	0	0	30,000	0	10,000	10,000	0	2,500	0		
Wastewater I-c (5-25 mgd)	0	0	1	15,000	15,000	10,000	10,000	10,000	2,500	2,500		
Wastewater I-c (<5 mgd)	0	0	8	2,500	20,000	10,000	10,000	80,000	2,500	20,000		
Wastewater II-a (>25 mgd)	0	0	3	15,000	45,000	2,500	2,500	7,500	3,750	11,250		
Wastewater II-a (5-25 mgd)	0	0	21	7,500	157,500	2,500	2,500	52,500	3,750	78,750		
Wastewater II-a (<5 mgd)	0	0	92	1,250	115,000	2,500	2,500	230,000	3,750	345,000		
Wastewater II-b (>25 mgd)	0	0	6	15,000	90,000	2,500	2,500	15,000	2,500	15,000		
Wastewater II-b (5-25 mgd)	0	0	13	7,500	97,500	2,500	2,500	32,500	2,500	32,500		
Wastewater II-b (<5 mgd)	0	3	444	1,250	555,000	2,500	2,500	1,110,000	2,500	1,110,000		
Wastewater II-c (>25 mgd)	0	0	0	15,000	0	2,500	2,500	0	1,250	0		
Wastewater II-c (5-25 mgd)	0	0	11	7,500	82,500	2,500	2,500	27,500	1,250	13,750		
Wastewater II-c (<5 mgd)	0	129	478	1,250	597,500	2,500	2,500	1,195,000	1,250	597,500		
Wastewater III-a (>25 mgd)	0	0	0	6,000	0	0	0	0	1,500	0		
Wastewater III-a (5-25 mgd)	0	0	1	3,000	3,000	0	0	0	1,500	1,500		
Wastewater III-a (<5 mgd)	0	0	206	500	103,000	0	0	0	1,500	309,000		
Wastewater III-b (>25 mgd)	0	0	1	6,000	6,000	0	0	0	1,500	1,500		
Wastewater III-b (5-25 mgd)	0	0	3	3,000	9,000	0	0	0	1,000	3,000		
Wastewater III-b (<5 mgd)	0	0	116	500	58,000	0	0	0	1,000	116,000		
Wastewater III-c (>25 mgd)	0	0	5	6,000	30,000	0	0	0	1,000	5,000		
Wastewater III-c (5-25 mgd)	0	0	30	3,000	90,000	0	0	0	500	15,000		
Wastewater III-c (<5 mgd)	0	11	635	500	317,500	0	0	0	500	317,500		
MS4 (>1,000K pop.)	0	0	10	20,000	200,000	20,000	20,000	200,000	20,000	200,000		
MS4 (500k-<1,000K pop.)	0	0	2	15,000	30,000	15,000	15,000	30,000	15,000	30,000		
MS4 (200k-<500K pop.)	0	0	5	10,000	50,000	10,000	10,000	50,000	10,000	50,000		
MS4 (100k-<200K pop.)	0	0	4	7,500	30,000	7,500	7,500	30,000	7,500	30,000		
MS4 (<100K pop.)	0	0	5	5,000	25,000	5,000	5,000	25,000	5,000	25,000		
Co-permittees	0	291	0	varies	401,250	varies	varies	401,250	varies	401,250		
Ind./Constr. Stormwater	0	0	2,798	500	1,399,000	0	0	0	0	1,399,000		
Ind./Constr. Stormwater	0	0	10,803	250	2,700,750	0	0	0	250	2,700,750		
<b>Large CAFO (new)</b>	780	0	780	4,000	3,120,000	2,000	2,000	1,560,000	1,100	858,000		
<b>General Permits</b>	0	0	1,241	250	310,250	0	0	0	250	310,250		
<b>Subtotal</b>	780	434	17,988		13,890,250			7,716,250		10,951,500		

**Alternative #4**  
**Estimated Core Regulatory Program Fee Revenue, Based on 1999-2000 Projected Dischargers**

Program / Rating	Number of Payers			Flow/Volume				Annual Charges			Compliance		
	New	Mod.	Ren.	Fee	Revenue	Fee	Revenue	Fee	Revenue	Fee	Revenue	Compliance	
												Fee	Revenue
<b>Section 401 Certifications</b>													
Certifications Issued	0	0	32	5,000	160,000	0	0	0	0	2,500	80,000		
Certifications Waived	0	0	1,070	1,000	1,070,000	0	0	0	0	250	267,500		
<b>Subtotal</b>	<b>0</b>	<b>0</b>	<b>1,102</b>		<b>1,230,000</b>		<b>0</b>				<b>347,500</b>		
<b>Non-Chapter 15 WDR</b>													
Wastewater I-a (>25 mgd)	0	0	4	30,000	120,000	10,000	40,000	10,000	40,000	7,500	30,000		
Wastewater I-a (5-25 mgd)	0	0	13	15,000	195,000	10,000	130,000	10,000	130,000	7,500	97,500		
Wastewater I-a (<5 mgd)	0	0	34	2,500	85,000	10,000	340,000	10,000	340,000	7,500	255,000		
Wastewater I-b (>25 mgd)	0	0	0	30,000	0	10,000	0	10,000	0	5,000	0		
Wastewater I-b (5-25 mgd)	0	0	4	15,000	60,000	10,000	40,000	10,000	40,000	5,000	20,000		
Wastewater I-b (<5 mgd)	0	0	24	2,500	60,000	10,000	240,000	10,000	240,000	5,000	120,000		
Wastewater I-c (>25 mgd)	0	0	2	30,000	60,000	10,000	20,000	10,000	20,000	2,500	5,000		
Wastewater I-c (5-25 mgd)	0	0	0	15,000	0	10,000	0	10,000	0	2,500	0		
Wastewater I-c (<5 mgd)	0	153	265	2,500	662,500	10,000	2,650,000	10,000	2,650,000	2,500	662,500		
Wastewater II-a (>25 mgd)	0	0	2	15,000	30,000	2,500	5,000	2,500	5,000	3,750	7,500		
Wastewater II-a (5-25 mgd)	0	0	12	7,500	90,000	2,500	30,000	2,500	30,000	3,750	45,000		
Wastewater II-a (<5 mgd)	0	5	114	1,250	142,500	2,500	285,000	2,500	285,000	3,750	427,500		
Wastewater II-b (>25 mgd)	0	0	1	15,000	15,000	2,500	2,500	2,500	2,500	2,500	2,500		
Wastewater II-b (5-25 mgd)	0	0	6	7,500	45,000	2,500	15,000	2,500	15,000	2,500	15,000		
Wastewater II-b (<5 mgd)	0	21	874	1,250	1,092,500	2,500	2,185,000	2,500	2,185,000	2,500	2,185,000		
Wastewater II-c (>25 mgd)	0	0	0	15,000	0	2,500	0	2,500	0	1,250	0		
Wastewater II-c (5-25 mgd)	0	0	4	7,500	30,000	2,500	10,000	2,500	10,000	1,250	5,000		
Wastewater II-c (<5 mgd)	0	66	427	1,250	533,750	2,500	1,067,500	2,500	1,067,500	1,250	533,750		
Wastewater III-a (>25 mgd)	0	0	0	6,000	0	0	0	0	0	1,500	0		
Wastewater III-a (5-25 mgd)	0	0	1	3,000	3,000	0	0	0	0	1,500	1,500		
Wastewater III-a (<5 mgd)	0	0	24	500	12,000	0	0	0	0	1,500	36,000		
Wastewater III-b (>25 mgd)	0	0	0	6,000	0	0	0	0	0	1,500	0		
Wastewater III-b (5-25 mgd)	0	0	3	3,000	9,000	0	0	0	0	1,000	3,000		
Wastewater III-b (<5 mgd)	0	3	427	500	213,500	0	0	0	0	1,000	427,000		
Wastewater III-c (>25 mgd)	0	0	2	6,000	12,000	0	0	0	0	1,000	2,000		
Wastewater III-c (5-25 mgd)	0	0	9	3,000	27,000	0	0	0	0	500	4,500		
Wastewater III-c (<5 mgd)	0	39	1,356	500	678,000	0	0	0	0	500	678,000		
<b>General Permits</b>	<b>0</b>	<b>0</b>	<b>484</b>	<b>250</b>	<b>121,000</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>250</b>	<b>121,000</b>		
<b>Subtotal</b>	<b>0</b>	<b>287</b>	<b>4,092</b>		<b>4,296,750</b>		<b>7,060,000</b>				<b>5,684,250</b>		

**Alternative #4**  
**Estimated Core Regulatory Program Fee Revenue, Based on 1999-2000 Projected Dischargers**

Program / Rating	Number of Payers			Flow/Volume				Annual Charges			Compliance	
	New	Mod.	Ren.	Fee	Revenue	Fee	Revenue	Fee	Revenue	Fee	Revenue	
												Environmental Risk
<b>Chapter 15 WDR</b>												
Wastewater I-a (>25 mgd)	0	0	0	30,000	0	10,000	0	0	7,500	0		
Wastewater I-a (5-25 mgd)	0	0	1	15,000	15,000	10,000	10,000	10,000	7,500	10,000	7,500	7,500
Wastewater I-a (<5 mgd)	0	0	84	2,500	210,000	10,000	840,000	0	7,500	840,000	7,500	630,000
Wastewater I-b (>25 mgd)	0	0	0	30,000	0	10,000	0	0	5,000	0		
Wastewater I-b (5-25 mgd)	0	0	0	15,000	0	10,000	0	0	5,000	0		
Wastewater I-b (<5 mgd)	0	0	180	2,500	450,000	10,000	1,800,000	0	5,000	1,800,000	5,000	900,000
Wastewater I-c (>25 mgd)	0	0	0	30,000	0	10,000	0	0	2,500	0		
Wastewater I-c (5-25 mgd)	0	0	0	15,000	0	10,000	0	0	2,500	0		
Wastewater I-c (<5 mgd)	0	0	4	2,500	10,000	10,000	40,000	0	2,500	40,000	2,500	10,000
Wastewater II-a (>25 mgd)	0	0	0	15,000	0	2,500	0	0	3,750	0		
Wastewater II-a (5-25 mgd)	0	0	0	7,500	0	2,500	0	0	3,750	0		
Wastewater II-a (<5 mgd)	0	0	48	1,250	60,000	2,500	120,000	0	3,750	120,000	3,750	180,000
Wastewater II-b (>25 mgd)	0	0	1	15,000	15,000	2,500	2,500	2,500	2,500	2,500	2,500	2,500
Wastewater II-b (5-25 mgd)	0	0	0	7,500	0	2,500	0	0	2,500	0		
Wastewater II-b (<5 mgd)	0	0	294	1,250	367,500	2,500	735,000	0	2,500	735,000	2,500	735,000
Wastewater II-c (>25 mgd)	0	0	0	15,000	0	2,500	0	0	1,250	0		
Wastewater II-c (5-25 mgd)	0	0	0	7,500	0	2,500	0	0	1,250	0		
Wastewater II-c (<5 mgd)	0	0	31	1,250	38,750	2,500	77,500	0	1,250	77,500	1,250	38,750
Wastewater III-a (>25 mgd)	0	0	0	6,000	0	0	0	0	1,500	0		
Wastewater III-a (5-25 mgd)	0	0	0	3,000	0	0	0	0	1,500	0		
Wastewater III-a (<5 mgd)	0	0	22	500	11,000	0	0	0	1,500	0		
Wastewater III-b (>25 mgd)	0	0	0	6,000	0	0	0	0	1,500	0		
Wastewater III-b (5-25 mgd)	0	0	0	3,000	0	0	0	0	1,000	0		
Wastewater III-b (<5 mgd)	0	0	192	500	96,000	0	0	0	1,000	0		
Wastewater III-c (>25 mgd)	0	0	0	6,000	0	0	0	0	1,000	0		
Wastewater III-c (5-25 mgd)	0	0	0	3,000	0	0	0	0	500	0		
Wastewater III-c (<5 mgd)	0	0	225	500	112,500	0	0	0	500	0		
Landfill (w/o liners)	0	269	269	0	0	2,500	672,500	0	2,500	672,500	2,500	672,500
Landfill (w/ liners)	0	30	30	0	0	0	0	0	2,500	0		
General Permits	0	0	9	500	4,500	0	0	0	250	0		
Subtotal	0	299	1,390		1,390,250		4,297,500					3,591,000
<b>Late Fees &amp; Charges</b>												
<b>Total</b>	<b>780</b>	<b>1,020</b>	<b>24,572</b>		<b>20,807,250</b>		<b>19,073,750</b>					<b>20,574,250</b>

**Alternative #4**  
**Estimated Core Regulatory Program Fee Revenue, Based on 1999-2000 Projected Dischargers**

Program / Rating	Number of Payers			Total Annualized Fee		Total Annualized Fee		Total Annualized Fee	
	New	Mod.	Ren.	New Permittee		Mod. Permittee		Ren. Permittee	
				Fee	Revenue	Fee	Revenue	Fee	Revenue
<b>NPDES Permit</b>									
Wastewater I-a (>25 mgd)	0	0	57	49,500	0	49,000	0	47,500	2,707,500
Wastewater I-a (5-25 mgd)	0	0	78	34,500	0	34,000	0	32,500	2,535,000
Wastewater I-a (<5 mgd)	0	0	114	22,000	0	21,500	0	20,000	2,280,000
Wastewater I-b (>25 mgd)	0	0	0	47,000	0	46,500	0	45,000	0
Wastewater I-b (5-25 mgd)	0	0	2	32,000	0	31,500	0	30,000	60,000
Wastewater I-b (<5 mgd)	0	0	15	19,500	0	19,000	0	17,500	262,500
Wastewater I-c (>25 mgd)	0	0	0	44,500	0	44,000	0	42,500	0
Wastewater I-c (5-25 mgd)	0	0	1	29,500	0	29,000	0	27,500	27,500
Wastewater I-c (<5 mgd)	0	0	8	17,000	0	16,500	0	15,000	120,000
Wastewater II-a (>25 mgd)	0	0	3	22,250	0	22,000	0	21,250	63,750
Wastewater II-a (5-25 mgd)	0	0	21	14,750	0	14,500	0	13,750	288,750
Wastewater II-a (<5 mgd)	0	0	92	8,500	0	8,250	0	7,500	690,000
Wastewater II-b (>25 mgd)	0	0	6	21,000	0	20,750	0	20,000	120,000
Wastewater II-b (5-25 mgd)	0	0	13	13,500	0	13,250	0	12,500	162,500
Wastewater II-b (<5 mgd)	0	3	444	7,250	0	7,000	21,000	6,250	2,775,000
Wastewater II-c (>25 mgd)	0	0	0	19,750	0	19,500	0	18,750	0
Wastewater II-c (5-25 mgd)	0	0	11	12,250	0	12,000	0	11,250	123,750
Wastewater II-c (<5 mgd)	0	129	478	6,000	0	5,750	741,750	5,000	2,390,000
Wastewater III-a (>25 mgd)	0	0	0	7,900	0	7,800	0	7,500	0
Wastewater III-a (5-25 mgd)	0	0	1	4,900	0	4,800	0	4,500	4,500
Wastewater III-a (<5 mgd)	0	0	206	2,400	0	2,300	0	2,000	412,000
Wastewater III-b (>25 mgd)	0	0	1	7,900	0	7,800	0	7,500	7,500
Wastewater III-b (5-25 mgd)	0	0	3	4,400	0	4,300	0	4,000	12,000
Wastewater III-b (<5 mgd)	0	0	116	1,900	0	1,800	0	1,500	174,000
Wastewater III-c (>25 mgd)	0	0	5	7,400	0	7,300	0	7,000	35,000
Wastewater III-c (5-25 mgd)	0	0	30	3,900	0	3,800	0	3,500	105,000
Wastewater III-c (<5 mgd)	0	11	635	1,400	0	1,300	14,300	1,000	635,000
MS4 (>1,000K pop.)	0	0	10	64,000	0	63,000	0	60,000	600,000
MS4 (500k<1,000K pop.)	0	0	2	48,000	0	47,250	0	45,000	90,000
MS4 (200k<500K pop.)	0	0	5	32,000	0	31,500	0	30,000	150,000
MS4 (100k<200K pop.)	0	0	4	24,000	0	23,625	0	22,500	90,000
MS4 (<100K pop.)	0	0	5	16,000	0	15,750	0	15,000	75,000
Co-permittees	0	291	0	varies	0	varies	0	varies	1,203,750
Ind./Constr. Stormwater	0	0	2,798	1,400	0	1,300	0	1,000	2,798,000
Ind./Constr. Stormwater	0	0	10,803	700	0	650	0	500	5,401,500
Large CAFO (new)	780	0	780	7,500	5,850,000	7,400	0	7,100	5,538,000
General Permits	0	0	1,241	700	0	650	0	500	620,500
<b>Subtotal</b>	<b>780</b>	<b>434</b>	<b>17,988</b>		<b>5,850,000</b>		<b>777,050</b>		<b>32,558,000</b>

**Alternative #4**  
**Estimated Core Regulatory Program Fee Revenue, Based on 1999-2000 Projected Dischargers**

Program / Rating	Number of Payers			Total Annualized Fee		Total Annualized Fee		Total Annualized Fee	
	New	Mod.	Ren.	Fee	Revenue	Fee	Revenue	Fee	Revenue
<b>Section 401 Certifications</b>									
Certifications Issued	0	0	32	8,500	0	8,250	0	7,500	240,000
Certifications Waived	0	0	1,070	1,450	0	1,400	0	1,250	1,337,500
<b>Subtotal</b>	0	0	1,102		0		0		1,577,500
<b>Non-Chapter 15 WDR</b>									
Wastewater I-a (>25 mgd)	0	0	4	49,500	0	49,000	0	47,500	190,000
Wastewater I-a (5-25 mgd)	0	0	13	34,500	0	34,000	0	32,500	422,500
Wastewater I-a (<5 mgd)	0	0	34	22,000	0	21,500	0	20,000	680,000
Wastewater I-b (>25 mgd)	0	0	0	47,000	0	46,500	0	45,000	0
Wastewater I-b (5-25 mgd)	0	0	4	32,000	0	31,500	0	30,000	120,000
Wastewater I-b (<5 mgd)	0	0	24	19,500	0	19,000	0	17,500	420,000
Wastewater I-c (>25 mgd)	0	0	2	44,500	0	44,000	0	42,500	85,000
Wastewater I-c (5-25 mgd)	0	0	0	29,500	0	29,000	0	27,500	0
Wastewater I-c (<5 mgd)	0	153	265	17,000	0	16,500	2,524,500	15,000	3,975,000
Wastewater II-a (>25 mgd)	0	0	2	22,250	0	22,000	0	21,250	42,500
Wastewater II-a (5-25 mgd)	0	0	12	14,750	0	14,500	0	13,750	165,000
Wastewater II-a (<5 mgd)	0	5	114	8,500	0	8,250	41,250	7,500	855,000
Wastewater II-b (>25 mgd)	0	0	1	21,000	0	20,750	0	20,000	20,000
Wastewater II-b (5-25 mgd)	0	0	6	13,500	0	13,250	0	12,500	75,000
Wastewater II-b (<5 mgd)	0	21	874	7,250	0	7,000	147,000	6,250	5,462,500
Wastewater II-c (>25 mgd)	0	0	0	19,750	0	19,500	0	18,750	0
Wastewater II-c (5-25 mgd)	0	0	4	12,250	0	12,000	0	11,250	45,000
Wastewater II-c (<5 mgd)	0	66	427	6,000	0	5,750	379,500	5,000	2,135,000
Wastewater III-a (>25 mgd)	0	0	0	7,900	0	7,800	0	7,500	0
Wastewater III-a (5-25 mgd)	0	0	1	4,900	0	4,800	0	4,500	4,500
Wastewater III-a (<5 mgd)	0	0	24	2,400	0	2,300	0	2,000	48,000
Wastewater III-b (>25 mgd)	0	0	0	7,900	0	7,800	0	7,500	0
Wastewater III-b (5-25 mgd)	0	0	3	4,400	0	4,300	0	4,000	12,000
Wastewater III-b (<5 mgd)	0	3	427	1,900	0	1,800	5,400	1,500	640,500
Wastewater III-c (>25 mgd)	0	0	2	7,400	0	7,300	0	7,000	14,000
Wastewater III-c (5-25 mgd)	0	0	9	3,900	0	3,800	0	3,500	31,500
Wastewater III-c (<5 mgd)	0	39	1,356	1,400	0	1,300	50,700	1,000	1,356,000
<b>General Permits</b>	0	0	484	700	0	650	0	500	242,000
<b>Subtotal</b>	0	287	4,092		0		3,148,350	0	17,041,000

**Alternative #4**  
**Estimated Core Regulatory Program Fee Revenue, Based on 1999-2000 Projected Dischargers**

Program / Rating	Number of Payers			Total Annualized Fee New Permittee		Total Annualized Fee Mod. Permittee		Total Annualized Fee Ren. Permittee	
	New	Mod.	Ren.	Fee	Revenue	Fee	Revenue	Fee	Revenue
<b>Chapter 15 WDR</b>									
Wastewater I-a (>25 mgd)	0	0	0	49,500	0	49,000	0	47,500	0
Wastewater I-a (5-25 mgd)	0	0	1	34,500	0	34,000	0	32,500	32,500
Wastewater I-a (<5 mgd)	0	0	84	22,000	0	21,500	0	20,000	1,680,000
Wastewater I-b (>25 mgd)	0	0	0	47,000	0	46,500	0	45,000	0
Wastewater I-b (5-25 mgd)	0	0	0	32,000	0	31,500	0	30,000	0
Wastewater I-b (<5 mgd)	0	0	180	19,500	0	19,000	0	17,500	3,150,000
Wastewater I-c (>25 mgd)	0	0	0	44,500	0	44,000	0	42,500	0
Wastewater I-c (5-25 mgd)	0	0	0	29,500	0	29,000	0	27,500	0
Wastewater I-c (<5 mgd)	0	0	4	17,000	0	16,500	0	15,000	60,000
Wastewater II-a (>25 mgd)	0	0	0	22,250	0	22,000	0	21,250	0
Wastewater II-a (5-25 mgd)	0	0	0	14,750	0	14,500	0	13,750	0
Wastewater II-a (<5 mgd)	0	0	48	8,500	0	8,250	0	7,500	360,000
Wastewater II-b (>25 mgd)	0	0	1	21,000	0	20,750	0	20,000	20,000
Wastewater II-b (5-25 mgd)	0	0	0	13,500	0	13,250	0	12,500	0
Wastewater II-b (<5 mgd)	0	0	294	7,250	0	7,000	0	6,250	1,837,500
Wastewater II-c (>25 mgd)	0	0	0	19,750	0	19,500	0	18,750	0
Wastewater II-c (5-25 mgd)	0	0	0	12,250	0	12,000	0	11,250	0
Wastewater II-c (<5 mgd)	0	0	31	6,000	0	5,750	0	5,000	155,000
Wastewater III-a (>25 mgd)	0	0	0	7,900	0	7,800	0	7,500	0
Wastewater III-a (5-25 mgd)	0	0	0	4,900	0	4,800	0	4,500	0
Wastewater III-a (<5 mgd)	0	0	22	2,400	0	2,300	0	2,000	44,000
Wastewater III-b (>25 mgd)	0	0	0	7,900	0	7,800	0	7,500	0
Wastewater III-b (5-25 mgd)	0	0	0	4,400	0	4,300	0	4,000	0
Wastewater III-b (<5 mgd)	0	0	192	1,900	0	1,800	0	1,500	288,000
Wastewater III-c (>25 mgd)	0	0	0	7,400	0	7,300	0	7,000	0
Wastewater III-c (5-25 mgd)	0	0	0	3,900	0	3,800	0	3,500	0
Wastewater III-c (<5 mgd)	0	0	225	1,400	0	1,300	0	1,000	225,000
<b>Landfill (w/o liners)</b>									
Landfill (w/o liners)	0	269	269	6,000	0	5,750	1,547,325	5,000	1,345,000
Landfill (w/ liners)	0	30	30	3,500	0	3,250	97,175	2,500	75,000
<b>General Permits</b>									
General Permits	0	0	9	950	0	900	0	750	6,750
<b>Subtotal</b>									
Subtotal	0	299	1,390		0		1,644,500		9,278,750
<b>Late Fees &amp; Charges</b>									
Late Fees & Charges									
<b>Total</b>									
Total	780	1,020	24,572		5,850,000		5,569,900		60,455,250