

**REPORT TO THE LEGISLATURE
AS REQUIRED BY
FY 1999/00 BUDGET ACT SUPPLEMENTAL LANGUAGE**

**FINAL REPORT
CORE REGULATORY PROGRAMS' NEEDS ANALYSIS**

This report has been prepared by the State Water Resources Control Board (SWRCB) in compliance with the provisions contained in the Supplemental Report of the 1999 Budget Act, Item 3940-001-0001. This report responds to the following provision:

“The State Water Resources Board shall provide the Legislature with reports on a baseline needs analysis for the core regulatory program (the NPDES, Chapter 15, Non-Chapter 15, and Storm Water programs). A preliminary report shall be provided by April 1, 2000 and a final report by January 1, 2001. The needs analysis shall reflect current program responsibilities under state and federal law and the major threats to water quality needing to be addressed in light of existing water quality conditions. The analysis shall include, but not be limited to, an assessment of needs for a cost-effective compliance assurance and enforcement program that serves to maximize compliance with clean water requirements.”

SB 390 (Chapter 686, Statutes of 1999) reinforced the Legislature’s directive to provide reports on the baseline needs assessment. This legislation further directed the SWRCB to consider the overall cost of the program and determine the adequacy of fees currently collected and expended under Water Code Section 13260. The SWRCB retained a consultant to conduct the fee study. The results of the fee study will be addressed separately from this report.

This report describes the results of the SWRCB and the Regional Water Quality Control Boards’ (RWQCB) Core Regulatory Program Needs Analysis (Needs Analysis). The report presents background relating to the programs involved and their funding history, describes the process followed, and presents the results of the Needs Analysis. The Needs Analysis projects an additional future need for 1,674 personnel years (PYs) and \$8.6 million in contracts to meet the SWRCB and RWQCBs’ (Boards’) mandate to protect water quality. In reviewing the report, it is important to consider the following:

- The SWRCB, and especially the RWQCBs, have received significant additional funding and staffing since the Needs Analysis was requested. For example, the FY 1998/99 Budget Act provided a staffing level of 1,334 PYs for the combined Boards while two years later (in FY 2000/01) the staffing stands at 1,726 PYs. This is an increase of 392 PYs or 29 percent over that period. Although only a portion of the increase is dedicated to the Core Regulatory Program, it is clear that the Administration and the Legislature appreciate the significance of providing adequate staffing to protect California’s water quality.

- The practical realities of recruiting, hiring and training a large number of engineers, geologists and scientists logically dictate that additional increases should be phased-in over time.
- The total projected additional future need of 1,674 is actually comprised of 1004 PYs to fund fully the existing program and 670 PYs for new work associated with the Core Regulatory Program. Much of the new work is based on assumptions regarding the number of new parties that will need to be regulated in the future under the storm water program. This number could change significantly based on actual experience.
- The Needs Analysis addresses the total universe of facilities and it is reasonable to prioritize efforts on the most critical activities and facilities and gradually build a program for the larger universe.

I. BACKGROUND

The Boards have the responsibility and authority for protecting the quality of the State's waters, including surface water and groundwater. Water quality may be affected by a variety of sources of waste, but waste sources are generally categorized as point source or nonpoint source. Point source discharges are generally described as planned, easily-identified "end-of-pipe" waste discharges from man-made conveyance systems (e.g. publicly owned treatment works) while nonpoint source discharges result from more diffuse sources such as agriculture, forestry, etc. The focus of the first water quality protection actions under the Federal Clean Water Act and the State's Porter-Cologne Water Quality Act were point sources, as they were the most serious and the most easily identified and controlled. The Boards' Core Regulatory Programs were established to deal with these discharges.

Over the last 25 years, the Boards' Core Regulatory Programs have made significant gains in cleaning up polluted waters and stepping up protection of high quality waters. Despite this progress, the State's waters still have not reached the 1972 Clean Water Act goal of restoring all rivers, lakes and coastal areas to fishable and swimmable conditions. The most recent biennial review of the State's water quality, required by federal law, identified over 500 water bodies in California that do not meet existing water quality standards. Increasing demands for water supply; additional and more intense industrial, commercial, municipal and agricultural activity; and significant population growth have created new water quality problems and amplified the significance of once lesser problems. Increasingly, attention is now focused on the growing and historically largely ignored problem of pollution from nonpoint sources. Emphasis on solving the nonpoint source pollution problems will continue to increase at a state and national level. The Boards face the challenge of directing limited staff resources to the greatest need within fund source constraints.

Ongoing support of the Core Regulatory Programs is crucial to sustain the gains made over the last 25 years in controlling pollution from point sources. The cycle of permitting (including revising and updating permits), monitoring, inspecting and enforcing compliance must be

maintained. The complexity of this process is increasing as new treatment technologies are developed, new information on effects of toxic pollutants becomes available, and new regulatory initiatives, regulations and requirements are implemented.

In order to better document the most significant point source needs, the Legislature directed the Boards to prepare a detailed Needs Analysis of the Core Regulatory Programs. These programs are summarized briefly below to orient the reader to the key responsibilities and functions of each program, supply background on the number of permits and dischargers affected by the programs, and provide a framework for the discussion of the approach taken by the Boards to prepare the requested Needs Analysis.

II. THE CORE REGULATORY PROGRAMS

The Boards' Core Regulatory Programs include the NPDES, Storm Water, Chapter 15, and Non-Chapter 15 Programs. The Boards issue NPDES permits and Waste Discharge Requirements (WDRs) as one of the primary means of protecting water quality in the Core Regulatory Programs. These regulatory tools impose limits on the quality and quantity of point source waste discharges. They specify conditions, which protect the beneficial uses and quality of receiving waters, implement Water Quality Control Plans, and when the discharge is to waters of the United States, meet the requirements of the Federal Clean Water Act. NPDES permits are issued to regulate discharges of waste from point sources to surface waters. Storm Water dischargers, even though they represent a more diffuse discharge than other point sources, are issued NPDES permits as a special category of point source discharge. WDRs are issued under State authority to regulate discharges to waters of the State (surface water and groundwater). These permits and WDRs can be in the form of an individual permit to an individual discharger or a "general permit" to multiple dischargers who discharge similar types of waste from similar sources.

NPDES Program

NPDES permits, issued by the Boards, are required for all point source pollution discharges of waste into California's surface waters to prevent pollution, loss or impairment of beneficial uses of the waters, damage to or loss of aquatic species and habitat, prevent human health problems and control waterborne diseases. In California, the NPDES Program is mandated by the Federal Clean Water Act and administered by the State.

Storm Water Program

Discharges of pollutants to storm water conveyance systems are significant sources of pollution to surface waters. These discharges are designated by federal law as point source discharges and subject to a NPDES permit. The Boards currently issue individual municipal separate storm sewer system (MS4) permits to municipalities with populations exceeding 100,000, and enroll dischargers under a statewide general industrial storm water permit and a statewide general construction storm water permit. The program is being expanded under the federally mandated Phase II to include regulation of smaller municipalities and construction activities disturbing less

than five acres. An additional 115 municipalities will require permits under Phase II of the program.

Chapter 15 Program

Waste discharges to land including treatment, storage or disposal sites, are regulated by the Chapter 15 Program. These sites include landfills, surface impoundments, waste piles, mining wastes, and land treatment units. Discharges from these facilities may impact water quality, particularly groundwater. The goals of the Chapter 15 Program are primarily preventative yet include a response action component to ensure adequate protection of water quality. Sites are regulated through issuance of WDRs or conditional waivers, enforcement orders or voluntary informal corrective action.

Non-Chapter 15 Program

Under the Non-Chapter 15 Program, liquid waste disposal impoundments and similar land disposal systems for liquid and solid wastes are regulated under WDRs issued by the Boards, under the authority of the Porter-Cologne Water Quality Control Act. These WDRs address many types of waste discharges, including municipal, industrial and commercial sources, which are not otherwise regulated under the NPDES Program or Chapter 15 Program.

401 Certification Program

Under the 401 Certification Program, the Boards issue certifications to applicants for US Army Corp of Engineers permits that the project meets water quality standards. Clean Water Act section 303 delegates to the states the establishment of water quality standards. Applicants for Corps 404 permits must obtain “water quality certification” from the State, pursuant to CWA section 401. Under the California Water Code, the Boards administer the 401 water quality certification program. To issue certification, the Boards must find that the discharge complies with State water quality standards, including protection of beneficial uses. Projects requiring 401 certification (e.g., land and port developments) are often large and technically complex. The Boards can certify, certify with condition, or deny certification. Approximately, 1142 applications are received and processed annually statewide.

The types and numbers of NPDES permits or WDRs involved in each of the above programs are shown in Table 1 below. These numbers change throughout the year as new permits or WDRs are issued and others rescinded.

TABLE 1			
PROGRAM	WDR OR PERMIT TYPE	NUMBER OF DISCHARGERS	
NPDES	Individual Permits	953	Total = 2194
	General	1241	
Non-Chapter 15	Individual WDRs	3208	Total = 3692
	General WDRs	484	

Chapter 15	Individual WDRs	862	Total = 1168
	General WDRs	306	
Storm Water	MS4	27	Total = 15,048
	General Industrial	9313	
	General Construction	5708	

Compliance Assurance and Enforcement

Compliance assurance and enforcement are integral components of all of the Core Regulatory Programs' activities. Both NPDES permits and WDRs may include a monitoring program to ensure compliance with discharge requirements. The Boards' staff conduct inspections to ensure compliance with permit or WDR conditions. The Boards are authorized to take a variety of formal and informal enforcement actions to obtain compliance with NPDES permits and WDRs. Formal enforcement actions may include issuance of cleanup and abatement orders, cease and desist orders, administrative civil liability orders and court action. Informal actions may include staff level actions to obtain compliance.

Funding History

The degree to which the Boards have been able to carry out their regulatory responsibilities has been largely dictated by available funding. Overall, the Boards' operations budget has grown substantially over the past ten years, increasing from \$93 million in FY 1989/90 to \$212 million in FY 2000/2001 (excluding funds for UST claims, State Revolving Fund loans, etc.). This trend may give the perception that the Boards' budget has grown enough to provide sufficient capacity to support its core regulatory functions as well as provide for redirection to newer emerging areas of need, such as nonpoint sources. A more detailed look reveals, however, that this is not the case.

While the Boards have grown substantially, much of the increase has supported activities other than the Core Regulatory Programs. Increases have gone to important and fund-specific tasks such as the underground storage tank cleanup activities, and bond-funded programs to support infrastructure projects such as wastewater treatment plants. The use of these funds is restricted to specific activities by statute, grant or contractual agreement. The funds often cannot be either used to assist in implementing new requirements or redirected to respond to emerging high priority issues.

As previously mentioned, it is important to note that the Administration and Legislature have added 392 PYs to the Boards' staffing over the last two years. Of this, the Core Regulatory Program has been significantly strengthened with an additional 148 PYs. These include 68.4 limited-term PYs to address permitting backlogs and enhance compliance inspections, 4 PYs addressed specifically at oversight of dairies, 7.6 PYs for increased water quality enforcement, 8.2 PYs for increased oversight of Chapter 15 facilities and 59.8 PYs to strengthen the Storm Water program. The Boards are currently recruiting, hiring and training the new staff necessary to meet the expectations of this augmentation.

III. ESTIMATING CORE REGULATORY PROGRAMS' WORKLOAD

As directed by the Supplemental Language, the focus of the Needs Analysis is solely on the Core Regulatory Programs. The basic objectives of the Needs Analysis are to: (1) define and quantify all of the work that needs to be done in the Core Regulatory Programs to protect water quality adequately and efficiently, and (2) compare the resource level necessary to accomplish that protection to the resources currently available. The analysis encompasses work currently performed, as well as work that should be performed, in light of existing mandates and acceptable levels of service. The process of conducting the Needs Analysis consisted of several major steps:

- Identifying the major activities that define the program;
- Projecting workload (estimating the frequency of each activity);
- Developing accurate workload standards (determining the average amount of time it takes to perform the activity);
- Calculating total program needs (calculating (workload projection x workload standard) and summing of individual activity needs, plus any overhead costs not attributable to individual activities).

The process of conducting a complete needs analysis for the Core Regulatory Programs was a very large undertaking for the Boards. Approximately 50 program staff from throughout the State were involved in four teams that performed the Core Regulatory Needs Analysis. Each Core Regulatory Program formed a focussed Needs Analysis team to evaluate its program issues, with experienced program representatives from each of the RWQCBs and a program manager from the SWRCB. In addition, a five person SWRCB project coordination team was established to oversee the broader effort and facilitate the teams. Due to the large workload required to conduct the detailed Needs Analysis, the teams met monthly over the course of the project. In addition, several hundred technical staff were involved in tracking the time they spent on specific program tasks.

A. Identifying Major Activities

To begin, the program teams outlined the categories of Board work that encompass each program. The categories and discrete activities were further reviewed and defined by team participants, and the Boards' management. Each program defined activities that were: (1) discrete and quantifiable, (2) output related, (3) direct program activities, and (4) clearly defined as SWRCB or program oversight functions, as appropriate. Enforcement factors, common to all programs, were developed to ensure enforcement needs are reviewed consistently between programs. Overhead, such as management and clerical support, that cannot be directly attributed, one-to-one, to these discrete activities was defined statewide and added during the final step of the process.

B. Projecting Workload

The Core Regulatory Programs' major activities define several of the Boards' core business functions: permitting, compliance inspections, monitoring report review, and enforcement. The

workload associated with these activities is a function of the number of dischargers regulated in each program (see Table 1 in Background section), and the required frequency of each of the activities. In general, the frequency of these activities is based on State and federal mandates where they are specified. However, in many cases the mandate just directs the Boards to “reasonably protect beneficial uses”. In these cases, the Boards have established minimum standards for these critical tasks to meet the mandate of protecting water quality.

The SWRCB’s Administrative Procedures Manual (APM) provides recommended levels or frequencies for many of the Core Regulatory Program activities. The APM, therefore, provides guidance for a portion of the Needs Analysis. In some cases, USEPA has provided minimum standards, which are used as the base to determine activity adequacy. Where no guidance exists, or where the guidance is not reflective of current water quality needs, the teams developed recommendations for management consideration.

For example, in the past, the Boards have found inspections to be a critical component of an effective compliance assurance program. As such, the existing APM recommends inspection frequencies that provide effective compliance assurance. The APM recommended frequencies vary depending on the type of discharge and the threat to water quality. The APM recommends twelve different inspection frequencies based on these factors.

The APM provides recommendations for the frequency of WDR issuance. Unlike NPDES permits, which must be renewed every five years, WDRs do not expire. The APM therefore reflects best judgment as to when WDRs should be reviewed - at five-, ten- and 15-year intervals, depending on the threat to water quality of the discharge.

Individual NPDES permits and WDRs specify the nature and frequency of monitoring reporting. As a result, the report review workload varies by permit or WDR. The existing APM does not provide detail on the appropriate level of effort for monitoring report review. The APM recommends only that monitoring reports should be reviewed within 30 days of receipt, and that the receipt and review should be documented. The APM is being revised to provide additional detail on monitoring report review and the Needs Analysis reflects the revised APM standards.

There are additional tasks, besides the core business functions mentioned above, that are conducted by the Boards’ staff in the various programs. Activities such as complaint investigation, program training, and outreach are variable and do not have established guidelines for the annual frequency because of their nature. These activities are difficult to anticipate in projecting workloads, but of necessity, were included in the Needs Analysis to reflect the entirety of each of the Core Regulatory Programs.

The program teams projected an average annual workload for most activities based on the total number of actions (e.g. total number of NPDES permittees) and the frequency with which each action should occur (e.g. NPDES permits expire every five years) considering mandates, program guidance and experience gained from existing practice. This step included documenting assumptions and sources of underlying data. For some factors, data management and tracking systems were not in place for calculating the total workload. In these cases, data from another program or some other form of estimation were used to model the function.

Projecting enforcement workload is problematic since workload is determined by the number of violations that require some type of enforcement action, and violations are by their nature unpredictable. The NPDES and Non-Chapter 15 programs had previously performed detailed analyses of violations and enforcement actions on an annual basis. Information from these analyses were used this to project enforcement workload for these programs. The Chapter 15 program also performed an analysis of violation and enforcement actions to serve as the basis for projecting enforcement workload. The Storm Water and 401 Certification programs developed program specific models based on the NPDES and Non-Chapter 15 analyses to project their enforcement workload.

C. Developing Workload Standards

A workload standard is the average amount of time it takes to perform a specific activity. The development of workload standards requires that very detailed information be collected from a large number of program staff and collated for analysis. An existing RWQCB time and activity tracking system was modified for the purpose of tracking staff time and associated outputs for developing the cost factors (workload standards). The time-tracking database was modified during the summer of 1999 and staff training on the overall project and use of the time tracking system was conducted at each RWQCB office. The automated system was fully operational in all RWQCBs by September 1999, but some RWQCB staff began manually tracking time July 1, 1999. Several hundred staff at all the Boards (including SWRCB) tracked the time they spent on discrete core regulatory activities to ensure that the data available for analysis are statistically valid and representative of the variations caused by different types of facilities or geographic conditions. Staff recorded time data for about 9 months logging 60,546 data entries totaling 188,980 hours.

The data collected for each cost factor was collated and evaluated by the Needs Analysis Team for each program, and a “standard” for each factor was determined. The teams evaluated the data variability and completeness. It was difficult to assign a single workload standard to some activities in the Core Regulatory Programs (e.g. WDR issuance), however, because time spent is highly variable depending on the controversial nature or complexity of the facility being regulated. Some activities, such as permitting, or siting a new landfill, take months or even years to complete. To mitigate this, many activities were tracked by facility over an extended time period to allow separation of different types or special cases. This aided in refining the analysis where timeframes vary widely. In some cases, more than one standard was determined if the data showed separate populations or a large range due to geographical differences or complexity. Collection of complete data on some long-term activities was outside the scope of this Needs Analysis. Workload standards for some of these activities were estimated by tracking time during the Needs Analysis data collection period and then projecting the gap to completion.

D. Calculating Total Program Needs

Once the total annual workload for each task was calculated, and a workload “standard” determined from the collected data, the required staff time was calculated. Each program team documented its work associated with each step of the process in a Needs Analysis Matrix. These

Needs Analysis Matrices are attached as Appendix A. These matrices document the objective of each activity, the calculation of the projected workload, and the workload standard developed by the team.

The final step in the process was calculating the total need for each Core Regulatory Program, including program-specific enforcement. Up to this point, the total program need was based on the time required for technical staff to complete tasks. Supervision and management, clerical, information technology and PC support, and legal support staff costs were added to the workload standard for each task to arrive at the total estimated task costs. The task and program specific information was then rolled-up to provide the overall statewide need for the Core Regulatory Programs.

The matrices attached as Appendix A provide examples of the steps of the Needs Analysis process for each of the Core Regulatory Programs. Since the activities performed by program staff at State Board often differ from the activities performed by Regional Board staff in the same program, separate analyses were performed and separate matrices developed.

IV. RESULTS

Overall, the Needs Analysis demonstrates a need for 2,088 PYs and \$8.6 million in contracts. With an existing FY 2001/02 baseline of 414 PYs for these programs, the future need is projected to be 1,674 PYs. This figure includes support for existing Core Regulatory Program workload plus anticipated future work necessary to comply with new mandates. The overall results of the Needs Analysis are presented in Tables 2 & 3 and discussed by program below.

Program	Program Need	Enforcement Need	Total Need	FY 2001/02 Baseline	Additional Future Need
NPDES	201	52	253	124	129
Non-Chapter 15	199	91	290	75	215
Dairies	159	59	218	4	214
Chapter 15	151	24	175	95	80
401 Certification	120	14	134	11	123
Storm Water Phase I	199	149	348	105	243
Subtotal	1029	389	1418	414	1004
New Workload					
Storm Water Phase II	112	63	175	0	175
Storm Water Non-filer	166	329	495	0	495
Subtotal	278	392	670	0	670
Total	1307	781	2088	414	1674

Program	One-time Need	Annual Need (lab services)	FY 2001/02 Baseline	Total Need
NPDES		\$1,766,500	\$1,824,448	\$647,052
Non-Chapter 15		\$705,000		
Dairies		\$780,000	0	\$780,000
Chapter 15		0	0	0
401 Certification		0	0	0
Storm Water Phase I		\$60,000	0	\$60,000
(Non-filer search)	\$6,063,400		0	\$6,063,400
(Develop training)	\$1,000,000		0	\$1,000,000
Storm Water Phase II		\$40,000	0	\$40,000
Storm Water Non-filer		0	0	
Total	\$7,063,400	\$3,351,500	\$1,824,448	\$8,590,452

Factors to Consider

There are several important factors to consider when reviewing the data.

Existing Workload vs. New Workload: As noted earlier, the estimated total need of 1,674 PYs actually has two components. The SWRCB estimates that 1004 PYs are needed to fund fully the existing program commitments (write or update permits, conduct all the inspections, review monitoring reports, take necessary enforcement action, etc) on the existing universe of known facilities. In addition, the SWRCB estimates that 670 PYs will be needed for new work associated with the federally mandated storm water program, some of which reflects assumptions that may change with more experience. For example, the Storm Water program estimates that approximately 80,000 industrial facilities have not filed for coverage or exemption from the general industrial storm water permit. Based on existing ratios of facilities that have filed, the program estimates that 10,000-20,000 of these facilities would enroll for coverage under the permit. The projected workload and resource needs for the program growth resulting from the non-filer effort are based on these assumptions.

Increased Efficiencies vs. Increasingly Complex Workload: It is important to note that the workload need estimates are based primarily on the current approach to program management. On the one hand, it is reasonable to assume that the estimates may be reduced as future efficiencies through improved technology and communication are realized, enhanced contracting is undertaken where feasible, etc. On the other hand, the estimates could increase due to new regulations, increasingly complex science, etc. For example, the California Toxics Rule (CTR) promulgated by US EPA established water quality standards for a large number of constituents that now must be incorporated into NPDES permits as effluent limitations. The SWRCB adopted a Statewide Implementation Policy to guide this effort. The effect of these actions,

which became effective during May 2000, could not be quantified and included in the permitting workload standards. It is clear that implementing the CTR is significantly increasing the complexity of issuing NPDES.

Contracts (Table 3): Along with the estimates of staff, the Board also estimates that \$8.6 million will be needed for contracts. The recurring annual contract needs are for laboratory services to analyze water samples collected during compliance inspections or complaint investigations conducted by the NPDES, Non-Chapter 15 and Storm Water programs. The one-time contract needs identified for the Storm Water program are for (1) developing a standardized training program to educate and certify construction inspectors about storm water permit compliance (\$1,000,000) and (2) verifying and contacting all entities thought to be subject to regulation under the general storm water permits (\$6,063,400).

Program Impact

The following is a summary of the impact on the specific programs that comprise the Core Regulatory Program:

NPDES, Non-Chapter 15 and Dairies: The bulk of the NPDES (253 PYs) and Non-Chapter 15 (290 PYs) projected need is based on staffing needed to provide adequate oversight of existing permits and WDRs. The most significant unmet resource needs for these programs are for renewing permits, updating WDRs, compliance inspections, monitoring report review and enforcement activities. The projected need for Dairies of 218 PYs is new work involving both the NPDES and Non-Chapter 15 programs. This need, for which the Boards have minimal existing resources, is based on a projected workload to regulate dairies consistent with the federal strategy for regulating confined animal feeding operations.

Chapter 15: Most of the Chapter 15 projected need of 175 PYs is based on existing WDRs, although allowance is made for issuing new WDRs. The projected new WDR workload is based on the historical average of new WDR applications (report of waste discharge). Program workload also projects assessing currently unregulated sites over a five-year period. The most significant unmet resource needs are for report reviews, enforcement activities, and unregulated sites.

401 Certification: Most of the 401 Certification projected need of 134 PYs is based on the average number of applications received over a two-year period. The most significant unmet resource needs are for: (1) adding conditions to a greater number of waivers that are currently waived unconditionally due to resource limitations and (2) pre-application consultation and compliance inspections.

Storm Water: The Storm Water program was divided into three components. The projected need for these components: 348 for existing or Phase I; 175 for the upcoming Phase II, mandated by US EPA; and 495 for the potential growth resulting from regulating facilities that have not yet filed for the existing baseline program (non-filer).

The most significant unmet resource needs for the Phase I program are for compliance inspections, report review, and enforcement activities. The Phase I program need projection includes a sizeable one-time contract (\$6,063,400) to search out and contact non-filers. As discussed earlier, the subsequent program growth resulting from this non-filer effort is the basis for “non-filer” need projection discussed below.

We currently estimate that there are approximately 80,000 industrial facilities statewide that have not filed with the program. Assuming these new filers will require regulation in approximately the same proportion as existing filers, approximately 20,000 additional facilities will enter the program. The projected non-filer need of 495 PYs addresses the resources necessary to conduct the basic program activities for these additional facilities (notice of intent and termination document review, compliance inspections and enforcement). The non-filer effort would ramp-up over a two-year period beginning in FY 2002-03, but would then become an additional ongoing annual workload for the program.

The Phase II component is a federally mandated expansion of the program. Phase II will include regulation of smaller municipalities and construction activities disturbing less than five acres. These are not now regulated under the baseline program. The projected need for this new work is 175 PYs, for which there is no existing baseline resource.

Enforcement: The Needs Analysis projects a need of 389 PYs for existing program enforcement activities and 392 PYs for new program enforcement activities. The projected need for a cost-effective enforcement program was included as a component of the Needs Analysis for each of the programs. The enforcement component of the total need for each program is presented in Table 2. Program activities included in the enforcement component represent the range of informal and formal enforcement options available to the Boards. The suite of options is the same for each program. However, the projected workload for each of the options is program specific. Activities such as compliance inspections and self-monitoring report review, which are traditionally considered compliance assurance activities were included in the analysis for each program, but were not included in total for enforcement. These activities are included in the “Program Need” totals for each program.

V. FUTURE IMPLEMENTATION

This Needs Analysis projects a significant need to implement existing workload and anticipated new work. As discussed above, the Boards have received significant increases to their Core Regulatory Program budget baseline over the last two years. The Boards are in the process of assimilating these increases by recruiting, hiring and training new staff for these positions. Given the magnitude of the projected need and the effort required to ramp up to use fully new resources, a phased approach to implementing additional augmentations to meet the projected need is appropriate. This approach includes adding staff or contract resources when feasible, prioritizing existing resources to focus on those problems that create the greatest threat to water quality, and continuing efforts to increase efficiency throughout our programs.

Prioritization:

As mentioned above, the Needs Analysis is based on the total universe of facilities and activities. It is reasonable to prioritize Core Regulatory Program efforts on the most critical activities and facilities that represent the greatest threat to water quality first and gradually increase the program to address the larger universe through additional incremental resource augmentations.

Increasing Efficiency:

The Boards are continuing efforts to increase efficiency. One of these efforts that will have positive effects on the Core Regulatory Program is development of the System for Water Information Management (SWIM). SWIM is a centralized data management system that will automate the Boards' water quality business processes. Phase I replaced the Boards' antiquated Waste Discharger System and began the process of automating water quality business process. Subsequent phases will incorporate all water quality programs and automate core business processes including: permitting, compliance and enforcement, discharger reporting, etc. Once developed and deployed, this system will provide efficiencies for a variety of core regulatory activities.

**FY 2001-02 STATEWIDE NEEDS ANALYSIS MATRIX
NPDES PROGRAM
Regional Boards**

APPENDIX A
Revised 10/26/00

Task	Basis for Workload Projection and Workload Standard	STATEWIDE			
		Total Annual Wkld	Unit Cost Factor (Hours)*	Total Need (Hours)*	PYs (@1775 hrs./PY)*
NPDES PERMIT ISSUANCE/RE-ISSUANCE					
1-Issue new Major Industrial permit	All complete applications processed and permits issued. Program manager Projection based on historical experience. SWIM historical data.	5	727	3,635	2.0
2-Reissue Major Industrial permit	Reissue every five years but even out workload. July 2000 SWIM data -1/5th of permits in this class. (72/5 = 14.4)	14	777	10,878	6.1
3-Issue new major Municipal permit	All complete applications processed and permits issued. Program manager projection based on historical SWIM data.	8	761	6,088	3.4
4-Reissue Major Municipal permit	Reissue every five years but even out workload. July 2000 SWIM data -1/5th of permits in this class. (184/5 = 36.8)	37	727	26,899	15.2
5-Issue new minor permit	All complete applications processed and permits issued. Program manager projection based on historical SWIM data.	33	363	11,979	6.7
6-Reissue minor permit	Reissue every five years but even out workload. July 2000 SWIM data -1/5th of permits in this class. (653/5 = 130.6)	131	287	37,597	21.2
7-Issue/Reissue General NPDES permit	Reissue every five years but even out workload. July 2000 SWIM data -1/5th of permits in this class. (35/5 = 7.2)	7.2	833	5,998	3.4
8-Enroll/Re-enroll discharger under General NPDES permit	All applicants enrolled within 30 days. July 2000 SWIM files-20% of enrollees per year for re-enrollment every 5 years. (1253 x .2 = 250.6)	251	13	3,263	1.8
INSPECTIONS					
9-Perform Cat. 1A Inspection	Per APM. July 2000 SWIM files times APM standards.	856	18	15,408	8.7
10-Perform Cat. 1B,2,3,4,5&6 Inspection	Per APM. July 2000 SWIM files times APM standards for Cat 1B plus 20% for other categories.	3023	15	45,345	25.5
INVESTIGATIONS					
11-Complaint Investigation & Follow-up	Respond to all complaints. Historical experience is 10% of number of facilities (July 2000 SWIM data) (2176 x .1 = 218)	218	17	3,706	2.1
MONITORING/COMPLIANCE					
12-Level 1 DMR Review	Review all DMRs. Based on FY 1998-99 and FY 1999-00 average number of DMRs received.	8700	2	17,400	9.8
13-Level 2 DMR Review	DMRs w/violations and annually per facility. SWIM files and one-fourth of DMRs received. July 2000 SWIM data and FY 1998-99 and FY 1999-00 average number received.	4347	8	34,776	19.6
14-Level 3 DMR Review	Every fifth year. SWIM files as of July 2000. (2176/5 = 438.4)	438	27	11,826	6.7
15-Prepare QNCR	Quarterly for all majors in SNC. Number of major times 4. Based on July 2000 SWIM data. (257 x 4 = 1028)	1028	2	2,056	1.2
PRETREATMENT					
16-Pretreatment audit	Once every five years. 20% of number of pretreatment programs. (100 x .2 = 20)	20	149	2,980	1.7
17-Pretreatment inspection	Once each year not audited. 80% of number of pretreatment programs. (100 x .8 = 80)	80	101	8,080	4.6
18-Pretreatment program modifications	Historical experience is 10% of number of programs. (100 x .1 = 10)	10	41	410	0.2
19-Pretreatment annual reports/follow-up	Review all annual reports.	100	14	1,400	0.8
CASEHANDLING					
20-Permit Oversight (Casehandling)	Number of facilities. Based on July 2000 SWIM data.	2176	16	34,816	19.6
APPEALS AND LITIGATION					
21-Appeals of RWQCB permitting actions	Follow APM and OCC requirements for administrative record. RWQCB estimate based on FY 1999-00 experience.	25	169	4,225	2.4
22-Petitions appealing enf. actions	RWQCB estimate based on FY 1999-00 experience. (0 simple each and 37 complex)	0	7	0	0.0
		37	169	6,253	3.5

**FY 2001-02 STATEWIDE NEEDS ANALYSIS MATRIX
NPDES PROGRAM
Regional Boards**

APPENDIX A
Revised 10/26/00

Task	Basis for Workload Projection and Workload Standard	STATEWIDE			
		Total Annual Wkld	Unit Cost Factor (Hours)*	Total Need (Hours)*	PYs (@1775 hrs./PY)*
PROGRAM ADMINISTRATION					
P1-Training	68 hrs./person/year (68 x total technical PYs)			8,621	4.9
P2-Database Management	0.8 hrs./person/week (.8 x 50 x total technical PYs)			5,324	3.0
P3-Unit Meetings	1.7 hr./person/week (1.7x 50 x total technical PYs)			10,776	6.1
P4-Other (workplans, roundtable & technical mtgs., misc. communication, etc.)	676 hrs./office/year (676 x 12 = 8,112 hrs.)			8,112	4.6
ENFORCEMENT					
E1-Infomal enforcement	1999 Enforcement Review Team assessment as modified by program manager and RWQCBs.	920	7	6,440	3.6
Follow-up		920	5	4,600	2.6
E2-13267 letters (when used for enforcement)	RWQCB estimate.	116	8	928	0.5
Follow-up		116	8	928	0.5
E3-Notice to Comply - NTC/follow-up	RWQCB estimate.	106	7	742	0.4
E4-Cleanup & Abatement order/follow-up	1999 Enforcement Review Team assessment as modified by program manager and RWQCBs.	9	135	1,215	0.7
E5-Cease & Desist orders/follow-up	1999 Enforcement Review Team assessment as modified by program manager and RWQCBs.	125	203	25,375	14.3
E6-Administrative Civil Liability - Simple	1999 Enforcement Review Team assessment as modified by program manager and RWQCBs.	0	37	0	0.0
Follow-up (Simple)		0	37	0	0.0
Complex	Complex	140	203	28,420	16.0
Follow-up (complex)	Follow-up	140	68	9,520	5.4
E7-Time Schedule orders/follow-up	1999 Enforcement Review Team assessment as modified by program manager and RWQCBs.	4	203	812	0.5
E8-Referrals to AG, DA, other agency/follow-up	1999 Enforcement Review Team assessment as modified by program manager and RWQCBs.	22	237	5,214	2.9
E9-Third party actions/follow-up	RWQCB estimate.	23	17	391	0.2
E10-Migden Pollution Prevention Plans	As required by Migden Act. Assume 10% of number of facilities each year. RWQCB estimate. (2176 x .1 = 218)	218	7	1,526	0.9
TOTAL NEED (PYs)					233.2
LAB SERVICES RESOURCES					
Inspections	Samples taken w/all Cat 1A inspections. (856 x \$2,000 = \$ 1,712,000)	\$1,712,000			
Complaints	Samples taken w/complaint investigations. (218 x \$250 = \$54,500)	\$54,500			
		\$1,766,500			

**FY 2001-02 STATEWIDE NEEDS ANALYSIS MATRIX
NON-CHAPTER 15 PROGRAM
Regional Boards**

APPENDIX A
Revised 10/26/00

Task	Basis for Workload Projection and Workload Standard	STATEWIDE			
		Total Annual Wkld	Unit Cost Factor (Hours)*	Total Need (Hours)*	PYs (@1775 hrs./PY)*
WDR ISSUANCE/RE-ISSUANCE					
1-Issue (new) Cat. I WDR w/ CEQA	All complete applications processed and WDRs issued. Program Manager projection based on SWIM historical data.	15	444	6,660	3.8
2-Update Cat. I WDR	Update every 5 years per APM but even out workload. July 2000 SWIM data - 1/5th of WDRs in this class/year. (185/5 = 37)	37	343	12,691	7.1
3-Issue (new) Cat. II WDR w/ CEQA	All complete applications processed and permits issued. Program manager projection based on historical SWIM data.	69	368	25,392	14.3
4-Update Cat. II WDR	Update every 10 years but even out workload. July 2000 SWIM data -1/10th of WDRs in this class. (1203/10 = 120.3)	120.3	277	33,323	18.8
5-Issue (new) Cat. III WDR w/ CEQA	All complete applications processed and permits issued. Program manager projection based on historical SWIM data.	102	304	31,008	17.5
6-Update Cat. III WDR	Reissue every 15 years but even out workload. July 2000 SWIM data -1/15th of WDRs in this class. (1629/15 = 108.6)	109	220	23,980	13.5
7-Issue/Re-issue General WDR	Reissue every 5 years but even out workload. July 2000 SWIM data -1/5th of general WDRs. (26/5 = 5.2)	5.2	771	4,009	2.3
8-Enroll/Re-enroll discharger under General WDR	All applicants enrolled within 30 days. July 2000 SWIM files-20% of enrollees per year for re-enrollment every 5 years. (506 x .2 = 101.8)	102	12	1,224	0.7
INSPECTIONS					
9-Perform Cat. 1A Inspection	Per APM. July 2000 SWIM files times APM standards.	1,243	18	22,374	12.6
10-Perform Cat. 1B,2,3,4,5&6 Inspection	Per APM. July 2000 SWIM files times APM standards for Cat 1B plus 20% for other categories. (3455x1.2 =4146)	5,088	10	50,880	28.7
INVESTIGATIONS					
11-Complaint Investigation & Follow-up	Respond to all complaints. Historical experience is 10% of number of facilities (July 2000 SWIM data) (3455 x .1 = 345.5)	347	12	4,164	2.3
MONITORING/COMPLIANCE					
12-Level 1 SMR Review	Review all SMRs. Based on FY 1998-99 and FY 1999-00 average number of SMRs received.	19,537	1	15,630	8.8
13-Level 2 SMR Review	SMRs w/violations and annually per facility. SWIM files and one-fourth of SMRs received. July 2000 SWIM data and FY 1998-99 and FY 1999-00 average number received	8,339	5	41,695	23.5
14-Level 3 SMR Review	Every fifth year. SWIM files as of July 2000. (3455/5 = 691)	691.0	14	9,674	5.5
CASEHANDLING					
15-Permit Oversight (Casehandling)	Number of facilities. Based on July 2000 SWIM data.	3,455	8	27,640	15.6
APEALS AND LITIGATION					
16-Appeals of RWQCB permitting actions	Follow APM and OCC requirements for administrative record. RWQCB estimate based on FY 1999-00 experience.	12	169	2,028	1.1
17-Petitions appealing enf. Actions	Follow APM and OCC requirements for administrative record. RWQCB estimate based on FY 1999-00 experience.	17	169	2,873	1.6

**FY 2001-02 STATEWIDE NEEDS ANALYSIS MATRIX
NON-CHAPTER 15 PROGRAM
Regional Boards**

APPENDIX A
Revised 10/26/00

Task	Basis for Workload Projection and Workload Standard	STATEWIDE			
		Total Annual Wkld	Unit Cost Factor (Hours)*	Total Need (Hours)*	PYs (@1775 hrs./PY)*
PROGRAM ADMINISTRATION					
P1-Training	68 hrs./person/year (68 x total technical PYs)			10,567	6.0
P2-Database Management	0.8 hrs./person/week (.8 x 50 x total technical PYs)			6,527	3.7
P3-Unit Meetings	1.7 hr./person/week (1.7x 50 x total technical PYs)			13,209	7.4
P4-Other (workplans, roundtable & technical mtgs., misc. communication, etc.)	676 hrs./office/year (676 x 12 = 8,112 hrs.)			8,112	4.6
ENFORCEMENT					
E1-Infomal enforcement	1999 Enforcement Review Team assessment as modified by program manager and RWQCB.	1,187	7	8,309	4.7
follow-up	Follow-up.	1,187	5	5,935	3.3
E2-13267 letters (when used for enforcement)	RWQCB estimate.	146	8	1,168	0.7
follow-up	Follow-up.	146	8	1,168	0.7
E3-Notice to Comply - NTC/follow-up	RWQCB estimate.	162	7	1,134	0.6
E4-Cleanup & Abatement order/follow-up	1999 Enforcement Review Team assessment as modified by program manager and RWQCB.	102	135	13,770	7.8
E5-Cease & Desist orders/follow-up	1999 Enforcement Review Team assessment as modified by program manager and RWQCB.	126	203	25,578	14.4
E6-Administrative Civil Liability - Simple	1999 Enforcement Review Team assessment as modified by program manager and RWQCB.	0	37	0	0.0
Follow-up (Simple)		0	37	0	0.0
Complex	Complex	340	203	69,020	38.9
Follow-up (Complex)	Follow-up.	340	68	23,120	13.0
E7-Time Schedule orders/follow-up	1999 Enforcement Review Team assessment as modified by program manager and RWQCB.	1	203	203	0.1
E8-Referrals to AG, DA, other agency/follow-up	1999 Enforcement Review Team assessment as modified by program manager and RWQCB.	7	237	1,659	0.9
E9-Third party actions/follow-up	RWQCB estimate.	3	17	51	0.0
TOTAL NEED PYs					284.4
LAB SERVICES RESOURCES					
Inspections	Samples taken w/all Cat 1A inspections and others. (1,243 x \$500 = \$ 621,000)	\$621,000			
Complaints	Samples taken w/complaint investigations. (336 x \$250 = \$84,000)	\$84,000			
TOTAL		\$705,000			

**FY 2001-02 STATEWIDE NEEDS ANALYSIS MATRIX
NPDES/NON-CHAPTER 15 PROGRAMS
State Board**

APPENDIX A
Revised 9/23/00

Task	Basis for Workload Projection and Workload Standard	Total Annual Wkld	Unit Cost Factor (Hours)*	Total Need (Hours)*	PYs (@1775 per PY)*
PROGRAM/ GRANTS ADMINISTRATION					
1- Annual Work Plans	Prepare annual work plans for NPDES, Non 15, Storm Water and Section 104/106 grants.	4	845	3,380	1.9
2- Program Tracking and Performance Reporting	Track major activities resulting in outputs; quarterly and triannual reviews of progress against work plans. (4 work plans x 6 reviews/yr)	21	127	2,667	1.5
3- Program Grant Administration	Administer Section 104/106 grant.	N/A	845	845	0.5
4- Program Budget Administration	Administer budget for NPDES, Non 15, Storm Water, Section 104/106, General Fund TMDL	3	423	1,269	0.7
PRETREATMENT PROGRAM AND GRANTS ADMINISTRATION					
5- Program Mgmt/ Training	Provide RBs with program support/training.	N/A	2,415	2,415	1.4
6- Compliance Inspections	Provide RBs with program support/training in conducting PCI.	8	120	960	0.5
7- Compliance Audits	Provide RBs with program support/training in conducting PCA.	2	135	270	0.2
LEGISLATION/ BUDGET					
8- Bill Analysis	Based on projected number of bills assigned .	20	54	1,080	0.6
9- Budget Activities in Support of Legislation	Implement all enrolled bills; prepare BCPs and guidance as required.	2	135	270	0.2
PERMIT DEVELOPMENT AND REVIEW					
10- Review/ comment on draft WDRs	Review 90% of draft WDRs	675	12	8,100	4.6
11- Review/ comment on draft NPDES permits	Review 100% of draft NPDES permits.	530	12	6,360	3.6
SPECIAL STUDIES/ SERVICES					
12- Cleanup Oversight	Oversight of Penn Mine cleanup.	N/A	389	389	0.2
13- Sanitary Sewer Overflow Study	Historical average.	N/A	1,690	1,690	1.0
14- Regulations/ Policy/ Guidance/ Training	Historical information.	2	1,521	3,042	1.7
15- Ocean Outfall PLUME Model	Historical information.	10	135	1,350	0.8
TECHNICAL ANALYSIS and REPORTS On PETITIONS (non-enforcement)					
16- Develop Technical Reports	Evaluate technical issues and prepare reports for OCC. Assumes 10% of appeals generate technical reports.,	13	507	6,591	3.7
17- Participate in hearings	Annual average.	13	34	442	0.2
18- Response to Info Requests	Historical information.	100	5	500	0.3
CASE HANDLING					
19- Response to Controlled Correspondence	Historical information.	100	17	1,700	1.0
TOTAL NEED PYs					25.5

**FY 2001-02 STATEWIDE NEEDS ANALYSIS MATRIX
NPDES/NON-CHAPTER 15 PROGRAM (DAIRIES)
Regional Boards**

APPENDIX A
Revised 10/26/00

Task	Basis for Workload Projection and Workload Standard	STATEWIDE			
		Total Annual Wkld	Unit Cost Factor (Hours)*	Total Need (Hours)*	PYs (@1775 hrs./PY)*
NPDES PERMIT ISSUANCE/RE-ISSUANCE					
1-Issue/Re-issue new individual permit	Issue individual NPDES permits to dairies with more than 1500 head over 5 year period. Reissue every 5 years. 1/5th of dairies above 1500 head annually, based on inventory of dairies. (285 x .2 = 57)	57.0	727	41,439	23.3
2-Issue/Re-issue General NPDES permit	Issue general NPDES permit to dairies with more than 700 and less than 1500 head. Reissue every five years. Assume 1 general permit/RWQCB except R-5 w/4 and R-3,4,6&9 w/none. (8/5 = 1.6)	1.6	833	1,333	0.8
3-Enroll/Re-enroll discharger under General NPDES permit	All applicants enrolled within 30 days. 20% of dairies more than 700 head and less than 1500 head annually. Inventory of Dairies more than 700 head and less than 1500 head. (887 x .2 = 177.4)	177.4	13	2,306	1.3
NON-15 WDR ISSUANCE/UPDATE					
4-Issue/Update new individual Non-15 WDRs	Issue individual WDRs to 20% of dairies with less than 700 head over 5 year period (4% of dairies with less than 700 head annually), based on Inventory of dairies with less than 700 head. (1300 x .04 = 52)	52.0	444	23,088	13.0
5-Issue/Update General Non-15 WDR	Issue general WDR to 60% of dairies with less than 700 head. Update every five years. Assume 1 general WDR/RWQCB except R-5 w/4 and R-4,6,7,8&9 w/none. (7/5 = 1.4)	1.4	771	1,079	0.6
6-Enroll/Re-enroll discharger under General Non-15 WDR	All applicants enrolled within 30 days. 12% of dairies with less than 700 head annually based on inventory of dairies with less than 700 head. (1299 x .12 = 155.9)	155.9	12	1,871	1.1
DAIRY COMPLIANCE ASSISTANCE					
7-Evaluate dairies under Dairy QAP and those with violations	As required to meet Dairy QAP needs and assist dairies with violations. Based on RWQCB estimate of 10% of dairies annually. (2472 x .1 = 247.2)	247.2	27	6,674	3.8
8-Review and evaluate Comprehensive Nutrient management Plans	All dairies over 700 head every other year. 1/2 of dairies above 700 head annually, based on inventory of dairies with more than 700 head. (1172 x .5 = 586)	586.0	68	39,848	22.4
9-Review and evaluate Water Pollution Prevention Plans and Nutrient Management Plans for Non-15 WDRs	All dairies covered by Non-15 WDRs every other year. 2/5 of dairies with less than 700 head annually. (1300 x .4 = 520)	520.0	68	35,360	19.9
INSPECTIONS					
10-Perform Annual Inspection	Inspect all permitted dairies annually. SWIM files-- individual permits/WDRs and general permit/general WDR enrollees. Based on inventory of dairies.	2,286	15	34,290	19.3
11-Perform Bi-annual Thorough Inspection	1/2 of permitted dairies annually. 1/2 of dairies over 700 head and 2/5 of dairies w/less than 700 head based on inventory of dairies. (1172 x .5 = 586 plus 1300 x .4 = 520)	1,106	18	19,908	11.2
INVESTIGATIONS					
12-Complaint Investigation & Follow-up	Respond to all complaints. Historical experience is 10% of number of facilities. Based on an inventory of dairies. (2472 x .1 = 247.2)	247.2	12	2,966	1.7

**FY 2001-02 STATEWIDE NEEDS ANALYSIS MATRIX
NPDES/NON-CHAPTER 15 PROGRAM (DAIRIES)
Regional Boards**

Task	Basis for Workload Projection and Workload Standard	STATEWIDE			
		Total Annual Wkld	Unit Cost Factor (Hours)*	Total Need (Hours)*	PYs (@1775 hrs./PY)*
MONITORING/ COMPLIANCE					
13-Annual report review	Review all annual reports. SWIM files--individual permits/WDRs and general permit/general WDR enrollees. Based on an inventory of dairies.	2,472.0	17	42,024	23.7
APPEALS AND LITIGATION					
14-Appeals of RWQCB permitting actions	Follow APM and OCC requirements for administrative record. Based on RWQCB estimate.	39.0	169	6,591	3.7
15-Petitions appealing enf. actions	Follow APM and OCC requirements for administrative record. RWQCB estimate of 10% of number of formal enforcement actions annually. (359 x .1 = 35.9)	35.9	169	6,067	3.4
PROGRAM ADMINISTRATION					
P1-Training	68 hrs./person/year (68 x total technical PYs)			8,220	4.6
P2-Database Management	0.8 hrs./person/week (.8 x 50 x total technical PYs)			5,077	2.9
P3-Unit Meetings	1.7 hr./person/week (1.7 x 50 x total technical PYs)			10,275	5.8
ENFORCEMENT					
E1-Informal enforcement	Provide positive response to every observed violation. RWQCB estimate of 37.5% of number of dairies each year. (2286 x .375 = 857.3)	857.3	7	6,001	3.4
Follow-up	Follow-up.	857.3	5	4,286	2.4
E2-13267 letters (when used for enforcement)	As required on a case-by-case basis. RWQCB estimate of 10% of number of dairies each year. (2472 x .1 = 247.2)	247.2	8	1,978	1.1
Follow-up	Follow-up.	247.2	8	1,978	1.1
E3-Notice to Comply - NTC/follow-up	Best professional judgment. RWQCB estimate of 10% of number of dairies each year. (2472 x .1 = 247.2)	247.2	7	1,730	1.0
E4-Cleanup & Abatement order/follow-up	As required on a case-by-case basis. RWQCB estimate of 5% of number of dairies each year. (2472 x .05 = 123.6)	123.6	135	16,686	9.4
E5-Cease & Desist orders/follow-up	As required on a case-by-case basis. RWQCB estimate of 5% of number of dairies each year. (2472 x .05 = 123.6)	123.6	203	25,091	14.1
E6-Administrative Civil Liability - Simple	As required on a case-by-case basis. RWQCB estimate of 5% of number of dairies each year. (2472 x .05 = 123.6)	0.0	37	0	0.0
Follow-up (simple)		0.0	37	0	0.0
Complex	Complex	123.6	203	25,091	14.1
Follow-up (complex)	Follow-up.	123.6	68	8,405	4.7
E7-Time Schedule orders/follow-up		0.0	203	0	0.0
E8-Referrals to AG, DA, other agency/follow-up	As required on a case-by-case basis. RWQCB estimate.	30.0	237	7,110	4.0
E9-Third party actions/follow-up	As required on a case-by-case basis. RWQCB estimate.	5.0	17	85	0.05
TOTAL NEED (PYs)					217.9
LAB SERVICES RESOURCES					
Inspections & complaints	Samples taken inspections and complaint investigations. (3,120 x \$250 = \$ 780,000)	\$780,000			
TOTAL		\$780,000			

**FY 2001-02 STATEWIDE NEEDS ANALYSIS MATRIX
CHAPTER 15 PROGRAM
Regional Boards**

APPENDIX A
Revised 10/11/00

Task	Basis for Workload Projection and Workload Standard	STATEWIDE			
		Total Annual Workload	Unit Cost Factor (Hours)*	Total Need (Hours)*	PYs (@1775 hrs./PY)*
CURRENTLY REGULATED SITES					
WDR ISSUANCE					
1-New WDR issuance	All new ROWDs. Historical average of new ROWDs submitted annually based on SWIM/year-end reports.	13	603	7,839	4.4
	Estimate of new projects worked on, but WDRs not completed.	50	201	10,050	5.7
2-WDR revision/update	Revise as a result of update/review process (per APM, every 5, 10 or 15 yrs based on TTWQ) or as requested by discharger. For "update" apply APM criteria to SWIM list of WDRs; for "revisions" use historical average of revision requests based on SWIM and year-end reports. (Total WDRs = 862; 94 Updates + 68 Revisions = 162)	162	269	43,578	24.6
3-WDR waiver, rescission	All ROWD's received requesting waiver or rescission; rescission needed as result of update/review process. Historical average of waivers and rescissions processed annually based on SWIM/year-end reports. (9 rescissions from update process + 10 waivers + 11 other = 30)	30	34	1,020	0.6
4-General WDR Enrollment, No action required	Prepare General- as needed; Enrollments- all applications received; NAR- as needed as a result of the update/review process. Historical average of NARs processed (SWIM) annually. Total # of general WDR enrollees (Region 4 & 9 data) divided by 3-year cycle. (General WDR enrollees -306/3 = 102; Update NAR = 5)	107	14	1,498	0.8
5-Monitoring and Reporting Program (MRP)	As requested by discharger or as determined by RB staff per Title 27. Historical average of requests and RB initiated MRPs based on RWQCB estimate of 5% of WDRs.	46	15	690	0.4
INSPECTIONS					
6- APM Inspections	APM: Cat I - 1A, 2B (195); Cat II - 1B (289); Cat III - 1B (369)(less SB 1082 sites). # sites/category x APM frequency @ inspection level.	1,219	12	14,628	8.2
REPORT REVIEWS					
7-Self-Monitoring Report (SMR) Review	Review all received (Receive all due). Total # SMRs required annually based on RWQCB counts/estimates of WDRs.	2,700	17	45,900	25.9
8-Technical Reports (non-enforcement; not part of ROWD/JTD) Review	Review all required submittals. Total # technical reports received annually based on RWQCB records/estimates.	2,200	12	26,400	14.9
9-Financial Assurance Documentation Review	Annual update and review of financial assurance documents for non-MSW landfills per Title 27. SWIM non-MSW landfills	507	34	17,238	9.7
CLOSURE					
10-Closure/ Post Closure	All closure/post closure plans. Historical average based on DCWP tracking system.	26	27	702	0.4
CASE HANDLING					
11-Case Handling and regulation of sites without Ch 15 WDRs or without waivers	As needed per site. Estimate total # of SWAT sites without WDRs = 2100. Number of sites with active RWQCB follow-up is 109. Based on SWIM data and SWAT reports.	109	34	3,706	2.1
12-Casehandling (sites w/ Ch 15 WDRs or waivers)	As needed per facility. Total # WDRs + waivers from SWIM.	872	17	14,824	8.4
INVESTIGATIONS					
13-Complaint processing and investigations	Respond to all. Projected # from time tracking data.	40	19	760	0.4
APPEALS AND LITIGATION					
14-Appeals and litigation (non-enforcement)	Respond to all filed. Historical average based on OCC and RWQCB records.	3	169	507	0.3
15-Petitions appealing enf. actions	Respond to all filed. Historical average based on OCC.	2	169	338	0.2

**FY 2001-02 STATEWIDE NEEDS ANALYSIS MATRIX
CHAPTER 15 PROGRAM
Regional Boards**

APPENDIX A
Revised 10/11/00

Task	Basis for Workload Projection and Workload Standard	STATEWIDE			
		Total Annual Workload	Unit Cost Factor (Hours)*	Total Need (Hours)*	PYs (@1775 hrs./PY)*
PROGRAM ADMINISTRATION					
P1-Training	66 hrs./person/year (66 x total technical PYs)			6,020	3.4
P2-Database Management	0.8 hrs./person/week (.8 x 50 x total technical PYs)			3,718	2.1
P3-Unit Meetings	1.7 hr./person/week (1.7x 50 x total technical PYs)			7,524	4.2
P4-Other (workplans, roundtable & technical mtgs., misc. communication, etc.)	676 hrs./office/year (676 x 12 = 8,112hrs.)			8,112	4.6
ENFORCEMENT					
E1-Infomal enforcement	Projected from Chapter 15 Enforcement Review Team.	500	7	3,500	2.0
Follow-up	Follow-up.	500	5	2,500	1.4
E2-13267 letters (when used for enforcement)	Projected from Chapter 15 Enforcement Review Team.	20	8	160	0.1
Follow-up	Follow-up.	20	8	160	0.1
E3-Notice to Comply - NTC/follow-up	Projected from Chapter 15 Enforcement Review Team.	40	7	280	0.2
E4-Cleanup & Abatement order/follow-up	Baseline from SWIM, gap projected from Chapter 15 Enforcement Review Team. Total = baseline + gap.	8	135	1,080	0.6
E5-Cease & Desist orders/follow-up	Baseline from SWIM, gap projected from Chapter 15 Enforcement Review Team. Total = baseline + gap.	1	203	203	0.1
E6-Administrative Civil Liability - Simple	Baseline from SWIM, gap projected from Chapter 15 Enforcement Review Team. Total = baseline + gap.	0	37	0	0.0
Follow-up (Simple)			0	0	0.0
Complex	Complex	22	203	4,466	2.5
Follow-up (Complex)	Follow-up.	22	68	1,496	0.8
E7-Time Schedule orders/follow-up	Baseline from SWIM, gap projected from Chapter 15 Enforcement Review Team. Total = baseline + gap.	0	203	0	0.0
E8-Referrals to AG, DA, other agency/follow-up	Baseline from SWIM, gap projected from Chapter 15 Enforcement Review Team. Total = baseline + gap.	2	237	474	0.3
E9-Third party actions/follow-up	Baseline from SWIM, gap projected from Chapter 15 Enforcement Review Team. Total = baseline + gap.	19	17	323	0.2
CURRENTLY UNREGULATED SITES					
ASSESSMENT OF UNREGULATED SITES					
ed sites would be assessed over a 5-year period. Existing unit cost factors were used where appropriate to define the assessment activities.					
U1-Initial assessment	Initial site definition to review existing information, identify owners, etc. Total unregulated SWAT sites from SWIM (2100) + Regional Board estimates of additional sites (900). Assess universe over 5 years (3000/5 = 600 per year)	600	17	10,200	5.7
U2-Inspection	Inspect all sites to assess TTWQ and need for additional work as part of initial assessment	600	12	7,200	4.1
U3-13267 letters	Request technical report to evaluate TTWQ	600	8	4,800	2.7
U4-Technical Report Review	Review requested submittals to evaluate need for additional work/regulation.	600	12	7,200	4.1
ISSUE ORDERS FOR ASSESSED SITES THREATENING WATER QUALITY					
U5-Cleanup & Abatement order	Regional Board estimate of the percentage of unregulated sites that will require CAO to achieve cleanup (35% of assessed sites need regulation - 210; of those 95% need CAO - 200)	200	135	27,000	15.2
U6-New WDR issuance	Regional Board estimate of the percentage of unregulated sites that will require WDR to achieve cleanup (35% of assessed sites need regulation - 210; of those 5% need WDR - 10)	10	603	6,030	3.4
TOTAL NEED (PYs)					164.6

**FY 2001-02 STATEWIDE NEEDS ANALYSIS MATRIX
CHAPTER 15 PROGRAM
State Board**

APPENDIX A
Revised 9/23/00

Task	Basis for Workload Projection and Workload Standard	Total Annual Wkld	Unit Cost Factor (Hours)*	Total Need (Hours)*	PYs (@1775 per PY)*
PROGRAM MANAGEMENT AND SUPPORT					
1- Program Administration	Based on total time in Time Tracker			3,329	1.9
2- Interactions with Public (excludes internet)	Based on total time in Time Tracker	176	3	528	0.3
3- Intra, Inter-agency coordination	Based on total time in Time Tracker	98	8	784	0.4
4- Regulation or Policy Development/ Revision	Historical average of one-fourth PY per year	0.25	3000	750	0.4
5- Special Assignments	Based on total time in Time Tracker	45	169	7,605	4.3
6- Bill Analysis/ Statutory Implementation	Based on section logs	30	8	240	0.1
DATA MANAGEMENT					
7- Web Site Content	Based on workplan and historical data	12	27	324	0.2
8- Database Content	100% of final WDRs	115	14	1,610	0.9
TECHNICAL SUPPORT					
9- Technical/ Regulatory Assistance to RBs	Based on total time in Time Tracker	400	5	2,000	1.1
10- Appeals of RB Actions	Historical average	2	423	846	0.5
11- Training Program	2 training sessions per year	2	507	1,014	0.6
12- Contract Management	Historical average	3	51	153	0.1
TOTAL NEED PYs					10.8

**FY 2001-02 STATEWIDE NEEDS ANALYSIS MATRIX
STORM WATER PROGRAM (PHASE I)
Regional Boards**

Task	Basis for Workload Projection and Workload Standard	STATEWIDE			
		Total Annual Wkld	Unit Cost Factor (Hours)*	Total Need (Hours)*	PYs (@1775 hrs./PY)*
PERMITS					
1-Statewide General Permits	RWQCB assistance/review of Statewide general permits @ 169 hrs./RWQCB/permit. 3 existing general permits for industrial, construction, and Caltrans, renewed every 5 years. Standard based on staff experience this FY. (3 permits/5 years = 0.6 permits/year) [0.6 x (196 hrs. x 9 RWQCB)]	0.6	1521	913	0.5
2-Statewide Industrial Sector General Permits	RWQCB assistance/review of Statewide general permits @ 169 hrs./RWQCB/permit. 10 major categories of industrial discharge. 2 developed per year, then renewed every 5 years. Standard based on experience with major industrial NPDES permits. [2 x (169 hr x 9 RWQCB)]	2	1521	3042	1.7
3-RWQCB Individual or General Permits	60 permits projected; renewed every 5 years. Standard based on experience with minor NPDES permits. (60 permits x .2 = 12) (Note: Round Table recommended increasing the # permits to 200 and the Unit Cost Factor to 507 hrs., but had no supporting documentation.)	12	346	4152	2.3
4-MS4 permits	26 existing MS4 permits; renewed every 5 years. Standard based on staff experience. (1 X large, 11 large, 14 medium)				
	(X large)	0.2	4056	811	0.5
	(large)	2.2	1352	2974	1.7
	(medium)	2.8	676	1893	1.1
5-Casehandling- MS4 Permits	Same as above (except Los Angeles is counted as 3 permits due to large number of co-permittees)	28	845	23660	13.3
INSPECTIONS					
6-Compliance inspections	Annual inspection of estimated 5900 active construction permittees; Bi-annual inspection of 9300 industrial permittees. (Note: Round Table discussed a Level of Service increase to 6.5 hrs.)	10,600	7.6	80560	45.4
	One inspection annually for 26 existing MS4s. Standard based on staff estimate of time needed to inspect records of permittee (including management of co-permittees).	26	135	3510	2.0
	One inspection annually for 275 existing MS4s co-permittees. Standard based on staff estimate of time needed to conduct comprehensive audits of co-permittee implementation of MS4 permits.	275	68	18700	10.5
	Annual inspection of Caltrans districts actions/activities to implement statewide permit. Standard based on MS4 model.	18	68	1224	0.7
	Annual inspection of estimated 500 active Caltrans construction projects. Standard same as construction inspection for individual enrollees.	500	8	4000	2.3
7-Notice of Termination inspection	Historical average of 1640 NOTs submitted annually. Standard based on tracking system.	1,640	2.5	4100	2.3
8-Sampling and Analysis Reduction/ exemption request validation	Historical average of 200 requests received by Regional Boards annually. Standard based on tracking system.	200	4	800	0.5
9-Other	Historical average of 150 inspections conducted annually. Standard based on tracking system.	150	7	1050	0.6
NON-FILER SEARCH					
10-Non-filer searches	Contracted activity	\$6,063,400			
	Previous non-filer efforts indicate a staff person will be needed in each regional board to manage the contractors' diverse efforts. An additional person will be needed at SB for overall contract development and management		1.7 PY per RB for contract oversight	27158	15.3
COMPLAINTS					
11-Complaint Processing and Investigations	Historical average of 1300 complaints received annually. Standard based on tracking system.	1,300	6	7800	4.4
DOCUMENT REVIEW					
12-NOI Document Review	2330/year received historically that RWQCBs must review. Standard based on tracking system.	2330	1.7	3961	2.2
13-NOT Document Review	1600/year approved historically, 100/year not approved by RWQCBs. Standard based on tracking system.	1700	1.7	2890	1.6
14-Annual Reviews	Cursory review of 9300 industrial permittees. Standard based on tracking system.	9,300	0.8	7440	4.2
	Comprehensive review of 50% of submittals from 9300 industrial permittees. Standard based on tracking system.	4,650	7	32550	18.3
	Comprehensive review of submittals from 26 MS4s. Standard based on staff estimate.	26	162	4212	2.4
	275 MS4 co-permittees. Standard based on staff estimate.	275	34	9350	5.3
	Comprehensive review of Caltrans district submittals.	18	93	1674	0.9
15-Storm Water Pollution Prevention Plans (SWPPP)	Required on average for 10% of 9300 industrial permittees and 20% of 5900 construction permittees. Standard based on tracking system. (Note: Round Table doubled workload based on their best estimate of an appropriate level of effort.)	2,020	8	16160	9.1
16-Various submittals	Historical average of 1660 annually. Standard based on RB estimate; half require 0.4 hr. minute review, half require 1.7 hr. review/comment.	830	0.4	332	0.2
		830	1.7	1411	0.8

**FY 2001-02 STATEWIDE NEEDS ANALYSIS MATRIX
STORM WATER PROGRAM (PHASE I)
Regional Boards**

APPENDIX A
Revised 11/6/00

Task	Basis for Workload Projection and Workload Standard	STATEWIDE			
		Total Annual Wkld	Unit Cost Factor (Hours)*	Total Need (Hours)*	PYs (@1775 hrs./PY)*
PUBLIC EDUCATION AND OUTREACH					
17-Public education/outreach	Modeled program including development and dissemination of materials, conduct and attend workshops, and response to public inquiries (detailed below). Standards based on staff estimates.				
	RWRCB develop and conduct 60 workshops per year.	60	135	8100	4.6
	Attend workshops conducted by others	120	14	1680	0.9
	Develop/revise outreach materials, program guidance		304 hrs/ RB	2736	1.5
	Respond to public inquiries (all media)		1690 hrs/ lg RB 845 hrs/ sm RB	11830	6.7
18-Identify/refine acceptable Best Management Practices (BMPs)	Past experience with BMP Handbooks and other guidance materials with staff providing peer review and contract management functions. Standard based on staff estimate.			1065	0.6
APPEALS AND LITIGATION					
19-Appeals and litigation (non-enforcement)	Respond to all filed. Projected historical average based on OCC and RWQCB records. (RWQCBs)	10	169	1690	1.0
20-Petitions appealing enf. actions	Respond to all filed. Historical average based on OCC. (RWQCB)	25	169	4225	2.4
PROGRAM ADMINISTRATION					
P1-Training	68 hrs./person/year (68 x total technical PYs)			12,338	7.0
P2-Database Management	0.8 hrs./person/week (.8 x 50 x total technical PYs)			7,621	4.3
P3-Unit Meetings	1.7 hr./person/week (1.7 x 50 x total technical PYs)			15,423	8.7
P4-Other (workplans, roundtable & technical mtgs., misc. communication, etc.)	676 hrs./office/year (676 x 12 = 8,112 hrs.)			8,112	4.6
ENFORCEMENT					
E1-Informal enforcement		6,765	7	47355	26.7
Follow-up.	Follow-up.	6,765	5	33825	19.1
E2-13267 letters (when used for enforcement)		676	8	5408	3.0
Follow-up.	Follow-up.	676	8	5408	3.0
E3-Notice to Comply - NTC/follow-up		676	7	4732	2.7
E4-Cleanup & Abatement order/follow-up		66	135	8910	5.0
E5-Cease & Desist orders/follow-up		66	68	4488	2.5
E6-Administrative Civil Liability - Simple	Simple case	1,243	37	45991	25.9
Follow-up - Simple	Follow-up.	1,243	37	45991	25.9
Complex	Complex case	20	203	4060	2.3
Follow-up - Complex	Follow-up.	20	68	1360	0.8
E7-Time Schedule orders/follow-up		0	203	0	0.0
E8-Referrals to AG, DA, other agency/follow-up		162	237	38394	21.6
E9-Third party actions/follow-up		169	17	2873	1.6
TOTAL NEED (PYs)					332.4
CONTRACTS FOR LAB SERVICES					
Inspections & Complaints	300 samples per year at \$200/sample. (300 x \$200 = \$ 60,000)	\$60,000			
TOTAL		\$60,000			

**FY 2001-02 STATEWIDE NEEDS ANALYSIS MATRIX
STORM WATER PROGRAM (PHASE I)
State Board**

APPENDIX A
Revised 10/27/00

Task	Basis for Workload Projection and Workload Standard	Total Annual Wkld	Unit Cost Factor (Hours)*	Total Need (Hours)*	PYs (@1775 per PY)*
PERMITS					
1-SWRCB General Permits	3 existing general permits for industrial, construction, and Caltrans, renewed every 5 years. Standard based on staff experience this FY. (3 permits/5 years = 0.6 permits/year)	0.6	2366	1420	0.8
2-SWRCB Industrial Sector General Permits	10 major categories of industrial discharge. 2 developed per year, then renewed every 5 years. Standard based on experience with major industrial NPDES permits.	2	676	1352	0.8
3-Casehandling-Caltrans		1	845	845	0.5
4-New and Terminating Enrollment Processing	Historically, an average 2330 new enrollments (NOI) and 1640 terminations are processed. Standard based on current processing times.	2,330	0.8	1864	1.1
	NOT	1,640	0.3	492	0.3
INSPECTIONS					
8-Compliance inspections	Annual inspection of Caltrans Headquarters actions/activities to implement statewide permit. Standard based on MS4 model.	1	101	101	0.1
DOCUMENT REVIEW					
9-Annual Reviews	Comprehensive review of Caltrans statewide submittal.	1	203	203	0.1
PUBLIC EDUCATION AND OUTREACH					
10-Public education/outreach	Modeled program including development and dissemination of materials, conduct and attend workshops, and response to public inquiries (detailed below). Standards based on staff estimates.				
	SWRCB assist/attend workshops.	60	27	1620	0.9
	Attend workshops conducted by others	44	14	616	0.3
	Develop/revise outreach materials, program guidance		676 hrs SB	676	0.4
11-Identify/refine acceptable Best Management Practices (BMPs)	Past experience with BMF Handbooks and other guidance materials with staff providing peer review and contract management functions. Standard based on staff estimate.			287	0.2
APPEALS AND LITIGATION					
12-Appeals and litigation (non-enforcement)	Respond to all filed. Projected historical average based on OCC and RWQCB records.	10	206	2060	1.2
13-Petitions appealing enforcement actions	Respond to all filed. Historical average based on OCC.	25	206	5150	2.9
PROGRAM ADMINISTRATION					
P1-Training	68 hrs./person/year (68 x total technical PYs)			380	0.2
P2-Database Management	Maintain statewide Storm Water data bases.				1.7
P3-Unit Meetings	1.7 hr./person/week (1.7 x 50 x total technical PYs)			475	0.3
P4-Other (workplans, roundtable & technical mtgs., misc. communication, etc.)	676 hrs./year plus 338 hours for contract management of Construction Certification Program contract.			1,014	0.6
DAS	Billing support				3.6
OIT	Database support				0.3
TOTAL NEED PYs					16.1
CONTRACT RESOURCES					
Construction Certification Program	Develop standardized training program to educate and certify construction inspectors about storm water permit compliance. (one time only)	\$1,000,000			
Total		\$1,000,000			

**FY 2001-02 STATEWIDE NEEDS ANALYSIS MATRIX
STORM WATER PROGRAM (PHASE II)
Regional Boards**

APPENDIX A
Revised 10/27/00

Task	Basis for Workload Projection and Workload Standard	STATEWIDE			
		Total Annual Wkld	Unit Cost Factor (Hours)*	Total Need (Hours)*	PYs (@1775 hrs./PY)*
PROGRAM DEVELOPMENT					
1-Model Phase II MS4 permit	Staff estimated workload based on Phase I -84 hrs/office (84 x 12 = 1008hrs)			1008	0.6
2-Implementation Policy development and review	Staff estimated workload based on Phase I - 84 hrs/office (84 x 12 = 1008hr)			1008	0.6
3-Designation Criteria	Staff estimated workload based on federal regulations - 51 hrs/office (51 x 12 = 360hrs/1775 = 0.20PY)			612	0.3
4-Equivalency Criteria	Staff estimated workload based on federal regulations - 17 hrs./office (12 x 17 = 204 hrs.)			204	0.1
PERMITS					
5-Regional Board General Small MS4 permits	Renew once every 5 years (total of 6 permits).	1.2	676	811	0.5
6-Small MS4 Casehandling	400 local, state and federal facilities	400	68	27200	15.3
7-Menu of BMPs -- Toolbox for compliance	60 fact sheets developed by SB; reviewed by RBs. RBs: 60 sheets x 7 hrs/sheet per RB office.	720	7	5040	2.8
NOTICES OF INTENT					
8-MS4	400 local, state and federal facilities	400	1.7	680	0.4
INSPECTIONS					
9-Compliance Inspections for small construction	Inspect 50% of small construction activities annually (estimated to be a minimum of 6,000).	3,000	7.6	22800	12.8
10-Compliance Inspections for small MS4s	Inspect all small MS4s annually (estimated to be 400).	400	68	27200	15.3
11-NOT Inspections	Inspect 25% of the NOTs for small construction (estimated to be a minimum of 6,000).	1,500	2.5	3750	2.1
INVESTIGATIONS					
12-Investigations	Estimated to be 10% of enrollees (total of 6400 enrollees).	640	6	3840	2.2
DOCUMENT REVIEW					
13-SWMP	Review all SWMPs for consistency with federal regulations, once every 5 years, ensure that the six minimum measures are being addressed in an adequate manner (estimated to be 400). 270 hrs (66 for overall report and 34 for each of the 6 minimum measures)	80	270	21600	12.2
14-RB review of Construction NOI		6,000	1.7	10200	5.7
15-MS4 Annual Report review		400	68	27200	15.3
PUBLIC EDUCATION AND OUTREACH					
16-Inform/educate public and potential dischargers of program requirements - compliance assistance	1.7 hour per small construction permit enrollee (this time can be used on any facet of Phase II compliance assistance.)	6000	1.7	10200	5.7
17-Develop Phase II targetted outreach materials		9	296	2664	1.5
18-Written and verbal Communications (response to inquires)	304 hrs/office/year (12 x 304 = 3648hrs)			3648	2.1
APPEALS AND LITIGATION					
19-Appeals and litigation (non-enforcement)	Respond to all filed. Projected historical average based on OCC and RWQCB records for Phase I program.	6	169	1014	0.6
20-Petitions appealing enf. actions	Respond to all filed. Historical average based on OCC records for Phase I program.	15	169	2535	1.4
PROGRAM ADMINISTRATION					
P1-Training	68 hrs./person/year (68 x total technical PYs)			6,289	3.5
P2-Database Management	0.8 hrs./person/week (.85 x 50 x total technical PYs)			3,884	2.2
P3-Unit Meetings	1.7 hr./person/week (1.7 x 50 x total technical PYs)			7,861	4.4

**FY 2001-02 STATEWIDE NEEDS ANALYSIS MATRIX
STORM WATER PROGRAM (PHASE II)
Regional Boards**

APPENDIX A
Revised 10/27/00

Task	Basis for Workload Projection and Workload Standard	STATEWIDE			
		Total Annual Wkld	Unit Cost Factor (Hours)*	Total Need (Hours)*	PYs (@1775 hrs./PY)*
ENFORCEMENT					
E1-Infomal enforcement/follow-up		2,848	7	19936	11.2
Follow-up.	Follow-up.	2,848	5	14240	8.0
E2-13267 letters (when used for enforcement)/follow-up		285	8	2280	1.3
Follow-up.	Follow-up.	285	8	2280	1.3
E3-Notice to Comply - NTC/follow-up		285	7	1995	1.1
E4-Cleanup & Abatement order/follow-up		28	135	3780	2.1
E5-Cease & Desist orders/follow-up		28	68	1904	1.1
E6-Administrative Civil Liability - Simple	Simple case	523	37	19351	10.9
Follow-up (simple).	Follow-up.	523	37	19351	10.9
Complex	(complex case)	9	203	1827	1.0
Follow-up (complex).	Follow-up.	9	68	612	0.3
E7-Time Schedule orders/follow-up		0	203	0	0.0
E8-Referrals to AG, DA, other agency/follow-up		68	237	16116	9.1
E9-Third party actions/follow-up		71	17	1207	0.7
TOTAL NEED (PYs)					166.8
CONTRACTS FOR LAB SERVICES					
Lab Services Contract	200 samples per year at \$200/sample. (200 x \$200 = \$ 40,000)	\$40,000			
TOTAL		\$40,000			

**FY 2001-02 STATEWIDE NEEDS ANALYSIS MATRIX
STORM WATER PROGRAM (PHASE II)
State Board**

APPENDIX A
Revised 9/23/00

Task	Basis for Workload Projection and Workload Standard	Total Annual Wkld	Unit Cost Factor (Hours)*	Total Need (Hours)*	PYs (@1775 hrs/PY)*
PROGRAM DEVELOPMENT					
1-Model Phase II MS4 permit	Prepare state-wide model for RB Phase II MS4 general permits; staff estimated workload based on Phase I	1.0	1352	1352	0.8
2-Implementation Policy development and review	Prepare state-wide implementation policy for Phase II; staff estimated workload based on Phase I	1.0	1352	1352	0.8
3-Designation Criteria	Prepare designation criteria for Phase II MS4s in accordance with Federal Regulations; staff estimated workload	1.0	338	338	0.2
4-Equivalency Criteria	Prepare equivalency criteria for local program compliance with statewide General SW Construction permit; staff estimated workload	1.0	203	203	0.1
PERMITS					
6-General Permit for State and Federal Facilities	Renew once each five years; staff estimated workload based on Phase I.	0.2	1014	203	0.1
7-General permit for small construction activities	Renew once each five years; staff estimated workload based on Phase I	0.2	1014	203	0.1
9-Menu of BMPs – Toolbox for compliance	Minimum 60 fact sheets developed by SB, reviewed by RBs; staff estimated workload.	60	25	1500	0.8
NOTICES OF INTENT					
10-Small Construction	Enroll small construction activities under general permit	6000	0.4	2400	1.4
PUBLIC EDUCATION AND OUTREACH					
19-Develop Phase II targeted outreach materials	Estimates based on Phase I program experience	10	34	340	0.2
20-Written and verbal Communications (response to inquiries)	Estimates based on Phase I program experience	500	1.7	850	0.5
APPEALS AND LITIGATION					
19-Appeals and litigation (non-enforcement)	Respond to all filed. Projected historical average based on OCC and RWQCB records for Phase I program.	6.0	206	1236	0.7
20-Petitions appealing enf. actions	Respond to all filed. Historical average based on OCC records for Phase I program.	15.0	206	3090	1.7
PROGRAM ADMINISTRATION					
P1-Training	68 hrs./person/year (68 x total technical PYs)			300	0.2
P2-Database Management	0.8 hrs./person/week (.8 x 50 x total technical PYs)			185	0.1
P3-Unit Meetings	1.7 hr./person/week (1.7 x 50 x total technical PYs)			375	0.2
TOTAL NEED (PYs)					7.8

**FY 2001-02 STATEWIDE NEEDS ANALYSIS MATRIX
STORM WATER PROGRAM (NON-FILER)**

APPENDIX A
Revised 10/27/00

Regional Boards

Task	Basis for Workload Projection and Workload Standard	STATEWIDE			
		Total Annual Wkid	Unit Cost Factor (Hours)*	Total Need (Hours)*	PYs (@1775 per PY)*
This work is to enroll the non-filers identified through the non-filer search contract effort (see Base Regional Board program). The majority of this work will not begin before FY 2002-03.					
NON-FILER GROWTH					
1-RWQCB NOI document review	Total estimated to be 20,000. (10,000/year for two years)	10,000	1.7	17,000	9.6
2-RWQCB NOT document review	Workload based on historical average for Phase I Program	1300	1.7	2,210	1.2
3-Compliance inspections	Inspect all active construction activities annually and all active industrial activities every other year. (total estimated to be 20,000 industrial facilities, 10,000 industrial storm water inspection per year after two year ramp-up)	10,000	7.6	76,000	42.8
4-Non-Applicability and no-Exposure Certification Inspections	Verify all claims once every 5 years. (total estimated to be 60,000 industrial facilities) (60,000/5 = 12,000) (12,000 verification inspection/year (after 2 year ramp-up))	12,000	4.2	50,400	28.4
5-Annual Report Review - Cursory	Cursory review of 100% of industrial reports received each year. (estimated to be 20,000 industrial facilities)	20,000	0.8	16,000	9.0
6-Annual Report Review - Comprehensive	Comprehensive review of 50% of industrial reports received each year. (total estimated to be 20,000 industrial facilities)	10,000	6.8	68,000	38.3
7-SWPPP review	Review as needed. (10% of industrial facilities) (20,000 x .1 = 2,000)	2,000	6	12,000	6.8
COMPLAINTS					
8-Complaint Processing and Investigations	Based on proportion of complaints received currently.	1,800	5	9,000	5.1
APEALS AND LITIGATION					
9-Appeals and litigation (non-enforcement)	Respond to all filed. Projected based on number for current program. (RWQCBs)	13	169	2,197	1.2
10-Petitions appealing enf. actions	Respond to all filed. Projected based on number for current program. (RWQCBs)	33	169	5,577	3.1
PROGRAM ADMINISTRATION					
P1-Training	68 hrs./person/year (68 x total technical PYs)			18,285	10.3
P2-Database Management	0.8 hrs./person/week (.8 x 50 x total technical PYs)			11,293	6.4
P3-Unit Meetings	1.7 hr./person/week (1.7 x 50 x total technical PYs)			22,856	12.9

**FY 2001-02 STATEWIDE NEEDS ANALYSIS MATRIX
STORM WATER PROGRAM (NON-FILER)
Regional Boards**

Task	Basis for Workload Projection and Workload Standard	STATEWIDE			
		Total Annual Wkid	Unit Cost Factor (Hours)*	Total Need (Hours)*	PYs (@1775 per PY)*
ENFORCEMENT					
E1-Infomal enforcement	Workload based on AEO evaluation of NPDES Program	8500	7	59,500	33.5
Follow-up.	Follow-up.	8500	5	42,500	23.9
E2-13267 letters (when used for enforcement)	Workload based on AEO evaluation of NPDES Program	850	8	6,800	3.8
Follow-up.	Follow-up.	850	8	6,800	3.8
E3-Notice to Comply - NTC/follow-up	Workload based on AEO evaluation of NPDES Program	850	7	5,950	3.4
E4-Cleanup & Abatement order/follow-up	Workload based on AEO evaluation of NPDES Program	83	135	11,205	6.3
E5-Cease & Desist orders/follow-up	Workload based on AEO evaluation of NPDES Program	1160	203	235,480	132.7
E6-Administrative Civil Liability-Simple	Workload based on historical tracking of annual report submittals	1560	37	57,720	32.5
Follow-up (simple).	Follow-up.	1560	37	57,720	32.5
Complex	Workload based on AEO evaluation of NPDES Program	50	203	10,150	5.7
Follow-up (complex).	Follow-up.	50	68	3,400	1.9
E7-Time Schedule orders/follow-up			203	0	0.0
E8-Referrals to AG, DA, other agency/follow-up	Workload based on AEO evaluation of NPDES Program	200	237	47,400	26.7
E9-Third party actions/follow-up	Workload based on AEO evaluation of NPDES Program	210	17	3,570	2.0
TOTAL NEED (PYs)					484.0

**FY 2001-02 STATEWIDE NEEDS ANALYSIS MATRIX
STORM WATER PROGRAM (NON-FILER)**

APPENDIX A
Revised 9/24/00

State Board

Task	Basis for Workload Projection and Workload Standard	STATEWIDE			
		Total Annual Wkld	Unit Cost Factor (Hours)*	Total Need (Hours)*	PYs (@1775 per PY)*
NON-FILER GROWTH					
1-SWRCB process new NOIs	Process new NOIs within 7 days of receipt. (total estimated to be 20,000) (10,000/year for two years)	10,000	0.8	8000	4.5
2-SWRCB process new NOTs	Process new NOIs within 7 days of receipt.	1300	0.3	439	0.2
APPEALS AND LITIGATION					
3-Appeals and litigation (non-enforcement)	Respond to all filed. Projected based on number projected for current program. (SWRCB)	13	206.2	2678	1.5
4-Petitions appealing enf. actions	Respond to all filed. Projected based on number projected for current program. (SWRCB)	33	206.2	6798	3.8
PROGRAM ADMINISTRATION					
P1-Training	68 hrs./person/year (68 x total technical PYs)			417	0.2
P2-Database Management	0.8 hrs./person/week (.8 x 50 x total technical PYs)			257	0.1
P3-Unit Meetings	1.7 hr./person/week (1.7 x 50 x total technical PYs)			521	0.3
TOTAL NEED (PYs)					10.8

**FY 2001-02 STATEWIDE NEEDS ANALYSIS MATRIX
401 CERTIFICATION PROGRAM
Regional Boards**

APPENDIX A
Revised 9/23/00

Task	Basis for Workload Projection and Workload Standard	STATEWIDE			
		Total Annual Wkld	Unit Cost Factor (Hours)*	Total Need (Hours)*	PYs (@1775 hrs./PY)*
PRE-PROJECT					
1- Pre- Application Consultation	Respond to all requests for information or assistance. Estimate of 50% of applications received (including allowance for projects that do not result in an application) plus 1 meeting/month/office. (1142 x .5 = 571)	571	20.3	11,420	6.4
	(meetings) (12 mtgs. x 12 offices = 144; COE/specific prospective application)	144	16.9	2,448	1.4
PROJECT SPECIFIC					
2- Application Acceptance	Review all applications within 30 days. Average of 1998 & 1999 (calendar years) # of applications received based on SWRCB database. Total apps. (1142) + 75% of apps. to account for incomplete apps. + 33% of incomplete for additional iteration before acceptance [(1142 x 1.75) + (.33 x 857) = 2281]	2281	10.1	22,810	12.9
3- Application Review	Review all applications within Corps of Engineers mandated time frames. Average of 1998 & 1999 (calendar years) # of applications received based on SWRCB database. (Based on actual of 40 Certs., 2 Cert. Denials, 250 WDR waivers w/conditions, 850 Cert. Waivers w/o conditions, but adjusted to reflect appropriate level of service to 132 Certs./Denials, 610 waivers w/conditions, and 400 waivers w/o conditions. Also, 1 interagency meeting/month/office)	132	304.2	40,128	22.6
	(waivers w/conditions)	610	118.3	71,980	40.6
	(waivers w/out conditions)	400	6.8	2,800	1.6
	(meetings) one interagency (e.g., Resources agency, Fish and Game, etc.) meeting/month/office to provide broader over-all interaction	144	16.9	2,448	1.4
4- Regulatory Action	Review all applications within Corps of Engineers mandated time frames. Average of 1998 & 1999 (calendar years) # of applications received based on SWRCB database. (Based on actual of 40 Certs., 2 Cert. Denials, 250 WDR waivers w/conditions, 850 Cert. Waivers w/o conditions, but adjusted to reflect appropriate level of service to 132 Certs./Denials and 1,010 waivers.)	132	20.3	2,640	1.5
	(waivers)	1,010	10.1	10,100	5.7
FOLLOW-UP					
5-Inspections	All projects receiving waiver w/conditions, certification w/ conditions or petitions. Average of 1998 & 1999 (calendar years) # of projects. (Based on 3 visits to actual of 40 certs. and 1 visit to 250 waivers w/conditions, but adjusted to reflect appropriate level of service to 130 certs. and 610 waivers w/conditions.) (130 certifications @ 3 visits/year = 390)	390	10.1	3,900	2.2
	(waivers w/conditions @ 1 visit/year)	610	10.1	6,100	3.4
6-Case Handling	Number of projects. (130 + 610 = 740)	740	6.8	5,180	2.9
APPEALS AND LITIGATION					
7-Appeals of RWQCB actions	Follow APM and OCC requirements for administrative record. Estimate of 1/office/year	12	169.0	2,028	1.1
8-Petitions appealing enf. Actions	Assume 5% of formal enforcement actions. (.05 x 277 = 14)	14	169.0	2,366	1.3

**FY 2001-02 STATEWIDE NEEDS ANALYSIS MATRIX
401 CERTIFICATION PROGRAM
Regional Boards**

APPENDIX A
Revised 9/23/00

Task	Basis for Workload Projection and Workload Standard	STATEWIDE			
		Total Annual Wkld	Unit Cost Factor (Hours)*	Total Need (Hours)*	PYs (@1775 hrs./PY)*
PROGRAM ADMINISTRATION					
P1-Training	68 hrs./person/year (68 x total technical PYs)			4,781	2.7
P2-Database Management	0.8 hrs./person/week (.8 x 50 x total technical PYs)			2,953	1.7
P3-Unit Meetings	1.7 hr./person/week (1.7 x 50 x total technical PYs)			5,976	3.4
P4-Other (workplans, roundtable & technical mtgs., misc. communication, etc.)	676 hrs./office/year (676 x 12 = 8,112 hrs.)			8,112	4.6
ENFORCEMENT					
E1-Infomal enforcement	Assume 50% non-compliance on 740 cases (130 Certs. + 610 waivers w/conditions) (740 x .5 = 370)	370	6.8	2,590	1.5
Follow-up	Follow-up. (assume follow-up on 100%)	370	5.1	1,850	1.0
E2-13267 letters (when used for enforcement)	Assume 50% non-compliance to infomal actions. (370 x .5 = 185)	185	8.5	1,480	0.8
Follow-up	Follow-up. (assume follow-up on 100%)	185	8.5	1,480	0.8
E3-Notice to Comply - NTC/follow-up	None projected.	0	6.8	0	0.0
E4-Cleanup & Abatement order/follow-up	None projected.	0	135.2	0	0.0
E5-Cease & Desist orders/follow-up	None projected.	0	202.8	0	0.0
E6-Administrative Civil Liability - Simple	Assume ACL necessary on 50% of 13267 letters and assume that 50% are complex. (185 x .5 = 92.5)	46	37.2	1,702	1.0
Follow-up (simple)		46	37.2	1,702	1.0
Complex		46	202.8	9,338	5.3
Follow-up (complex)	(complex)	46	67.6	3,128	1.8
E7-Time Schedule orders/follow-up	None projected.	0	202.8	0	0.0
E8-Referrals to AG, DA, other agency/follow-up	Assume 2/year	2	236.6	474	0.3
E9-Third party actions/follow-up	None projected.	0	16.9	0	0.0
TOTAL NEED (PYs)					130.7

**FY 2001-02 STATEWIDE NEEDS ANALYSIS MATRIX
401 CERTIFICATION PROGRAM
State Board**

APPENDIX A
Revised 9/24/00

Task	Basis for Workload Projection and Workload Standard	Total Annual Wkld	Unit Cost Factor (Hours)*	Total Need (Hours)*	PYs (@1775 hrs/PY)*
PRE- PROJECT					
1- Pre- Application Consultation	State Board database.	5	34	170	0.1
PROJECT SPECIFIC					
2- Application Acceptance	State Board database.	5	34	170	0.1
3- Application Review	State Board database.	5	34	170	0.1
4- Regulatory Action	State Board database.	5	34	170	0.1
5- Follow-up	State Board database.	47	5	235	0.1
6- RB Certification Recommendations	State Board database.				
Routine		36	17	612	0.3
Difficult		6	186	1,116	0.6
NON-PROJECT SPECIFIC					
7- Training	Develop and conduct training		515	515	0.3
8- General Coordination	State Board database & estimate of time spent on Corcom, BAWPG, SCWR, OPC, FPCP, etc.		896	896	0.5
9- Other Activities	Estimate based on experience with these activities.		338	338	0.2
10- Guidance	Estimate based on experience developing guidance for RBs.		1268	1268	0.7
11- Regulations	Estimate based on experience developing regulations.		2442	1445	0.8
TOTAL NEED PYs					4.0