

From: ellen carpenter [<mailto:ejcarpenter503@gmail.com>]
Sent: Wednesday, May 02, 2018 9:24 AM
To: Reg-Comment; Robinson, Kelly
Subject: Comments on Third Party Rulemaking for Regulation 37

Greetings:

Attached please find my comments (dated 05022018) on the Third Party Rulemaking for Regulation 37-Arkansas Nutrient Water Quality Trading Regulations, APCEC Docket No. 18-001-R. Also, please find the eight attachments referenced in the comments.

Please confirm receipt of the comments and the attachments.

Thank you.

Ellen Carpenter

Reg-comment@adeq.state.ar.us

3rd Party Request to Initiate Rulemaking
Regulation 37-Arkansas Nutrient Water Quality Trading Regulations
APCEC Docket No. 18-001-R

Thank you for the opportunity to provide comments on the new regulation for the State of Arkansas proposed by four cities located in Northwest Arkansas (Fayetteville, Springdale, Rogers and Bentonville). This draft regulation (Regulation 37) proposes to establish a water quality trading program for nutrients. If adopted, this will be the very first trading program established for the State of Arkansas.

Excessive nutrients (phosphorus and nitrogen) can cause water pollution. Increased nutrients contribute to the growth of algae. An algal bloom can lead to reduced dissolved oxygen, which is harmful to aquatic life. Algal blooms also can lead to the release of toxins, which make water unsafe for human contact. Therefore, a program designed to reduce nutrients should benefit Arkansas' water bodies. However, nutrient trading programs are complex. And creating a nutrient trading program without first having numeric water quality-based criteria for nutrients is putting the cart before the horse.

A. Please respond to the following comments in the Rulemaking's Response to Comments:

1. The proposed regulation is a "bare bones" regulation, which appears to lack sufficient specificity to ensure that nutrient water quality trading will result in trades that will protect and maintain water quality. The Petition to Initiate Third-Party Regulation states:

The draft nutrient trading regulation establishes the requirements, standards and procedures for the Director to review and approve applications for nutrient credit generating projects as sources of nutrient credits. Where authorized, the nutrient credits may then be used as offsets to nutrient discharges when determining compliance with permit terms, limits and conditions.

Paragraph 10, Petition to Initiate Third-Party Rulemaking to Adopt Proposed Regulation No. 37, Docket No. 18-001-R

This draft regulation consists of 7 pages for an entirely new statewide trading program, which is unlike any program previously administered by ADEQ. Critical terms are undefined ("watershed," "offsets," "unacceptable localized adverse effect on water quality," "baseline," etc.). Basic numeric nutrient *water quality* criteria critical to the successful implementation of a program intended to protect and maintain water quality and avoid hot spots (locally high concentrations of nutrients) are absent. And the basic administrative procedures are confusing (is the Director's decision appealable under Reg. 8.603 as a permitting decision or something else, can the Director's decision on trading implemented in an NPDES permit be appealed as part of the final permitting decision, how does one appeal an application involving nonpoint source nutrient credit-generating projects submitted to the Arkansas Natural Resources Commission for review, etc.)

This proposed rulemaking suggests an initial outline of items to consider in a trading program, but it does not provide sufficient flesh on its bare bones to enable ADEQ to implement a complex and entirely new nutrient trading program for the State of Arkansas. Using this draft regulation to establish a trading program is much like trying to construct a multi-story building using nothing more than a line drawing on a piece of paper. Without more, there is nothing to ensure the structure will stand and be habitable. Similarly, the "bare bones" outline of a nutrient trading program cannot ensure that trades will protect water quality and preclude hot spots. The foundations for both are missing. And the keystone missing from the trading program is the maximum instream nutrient concentrations that protect water quality and designated uses (either numeric nutrient water quality criteria or the instream target loads established through a total maximum daily load).

2. No dischargers should be allowed to use pollution credits as offsets for nutrient discharges to waterbodies identified as Outstanding Resource Waters in Reg. 2.203 (Antidegradation Policy). (For example, see AR0036811, AR0035459, AR0020231.)
3. Protecting public health and welfare is a fundamental mandate of environmental regulation. Section 2(A)(2) of the proposed regulation addresses trades in watersheds where public drinking water supplies are located. Specifically, the credit generating project has to be located in the same watershed as the reservoir that is designated as a public drinking water supply. This is an important provision for protecting public health and welfare and must remain in the regulation. But, to adequately protect public drinking water supplies, the regulation should be revised to add that the credit generating project must be located upstream of any public drinking water supply designated by the Department of Health because a credit generating project located downstream of a public drinking water supply will not protect the drinking water supply from increased nutrients.
4. Prior to this draft third-party rulemaking, it was generally thought the Director had enforcement discretion without it being specified by regulation. Including the enforcement discretion authority in this regulation now gives rise to potential future arguments about when the Director clearly does and does not have the authority to exercise this discretion. Accordingly, I ask that Section 3(B) be deleted from this regulation.

B. In the Rulemaking's Response to Comments, please confirm whether or not you agree with each of the following 10 comments:

- 1) Water quality based numeric criteria establish instream concentrations necessary to protect water quality and designated uses.
- 2) Arkansas has not adopted water quality based numeric nutrient criteria for phosphorus or nitrogen.
- 3) A nutrient trading program should ensure that water quality is maintained and protected and hotspots are not created.
- 4) The impact of nutrient trading on water quality cannot be **quantified** in the absence of established numeric water quality-based criteria for nutrients or instream target loads for

nutrients established through a total maximum daily load (TMDL) that is protective of water quality and designated uses.

- 5) If a nutrient credit purchaser buys credits from a downstream generator, the trade could result in a localized increase in nutrients in the segment between the buyer and the generator/seller.
- 6) Currently, NPDES Permit limits in Arkansas for total phosphorus (TP) are not water quality-based effluent limits.
- 7) Currently, NPDES permit limits for TP are technology derived limits based on the "generally accepted scientific knowledge and engineering practice in consideration of the technical information on TP treatment capability of the MBR treatment system." Pages 7- 8 of Fact Sheet, Permit Number AR002292 Draft Permit Modification, sent to public notice on 02/14/2018.
- 8) Currently, technology derived NPDES permit limits for TP are approximately an order of magnitude greater than the concentrations at which aquatic shifts are observed due to TP (See Final Report to Governors from the Joint Study Committee and Scientific Professionals, dated December 19, 2016).
- 9) For projects generating credits by point sources, a baseline for trading set as the NPDES permit limit for TP would set the baseline for trading at what technology can achieve and not on numeric water quality criteria.
- 10) Baselines for projects generating credits should be derived from and consistent with numeric nutrient water quality standards.

For any of the numbered comments above (1-10) with which you do not agree, please explain why you do not agree in the Rulemaking's Response to Comments. Additionally, for any numbered comment with which you agree, please include any necessary revisions to the draft regulation to ensure that the draft regulation conforms to the comments with which you agree.

C. Please provide answers to the following questions in the Rulemaking's Response to Comments:

1. This proposed regulation limits the approval of the credit generating project as a source of nutrient credits to a time period of five-years. This five-year time period of approval appears arbitrary. Shouldn't the proposed regulation require any purchased reduction to be produced during the same time period that a permit limit is actually applicable? If not, why not?
2. Does this proposed regulation potentially allow credits to be generated in a watershed that is different from the watershed where the credits can be applied? If so, how would trades involving different watersheds maintain and protect the water quality in the receiving stream for the NPDES discharge? How would trades involving different watersheds preclude hot spots?
3. Without water quality based numeric nutrient criteria that establish maximum in-stream concentrations for protecting water quality and designated uses, how can a nutrient trading program ensure that water quality is protected and maintained as a result of the trades?
4. Without water quality based numeric nutrient criteria, how can a nutrient trading program prevent the development of nutrient hot spots as a result of the trades?

5. How will pollutant loads, load reductions, and credits be quantified and verified?
6. What procedures will be used to track the generation and use of credits in NPDES permits and discharge monitoring reports?

- D. I note that the Petition to Initiate Rulemaking states "The Department has indicated an intent to separately adopt fees for the proposed Regulation No. 37 as part of APCEC Regulation No. 9. Also, Act 355 of 2015 provides that the trading program may include a schedule of user fees. And these user fees *shall* be based on a "record calculating the reasonable costs to the department of implementing and enforcing each nutrient water quality trading, credit, or offset program." Ark. Code Ann. § 8-4-232(b)(2)(E)(i) and (ii).

The proposed draft Regulation No. 37 introduces an entirely new statewide trading program without considering the costs in terms of resources and staff to ADEQ to administer such a program. ADEQ has undergone significant reorganization in the past two- to-three years. New management positions have been created in the Director's Office, most of the senior managers who were career employees either are no longer with the agency or are no longer in the program area over which they have extensive experience, and a large number of staff positions occupied by those who perform the agency's work on the ground went unfilled during 2017 and the same number continued to be unfilled at the beginning of 2018.

Director's Office

In 2015, the Director's Office consisted of five people—a Director, a Chief Deputy Director, a Deputy Director, a Legal Policy Advisor, and an administrative assistant to the Director. (See attached 2015 Director's Office Chart). Today, the Director's Office consists of 18 positions (see attached 2018 Director's Office List). Today, like before, the Director's Office includes a Director (same person) and a Chief Deputy Director (now called Senior Deputy Director). Where there was only one Deputy Director in 2015, now there are four (Deputy Director for Air, Deputy Director for Water, Deputy Director for Land, and one other). There is no longer a Legal Policy Advisor, but there is a General Counsel, and two Legal Services Specialists who have been added to the Director's Office. In 2015, where there was but one Executive Assistant to the Director, now there are two, as well as an Administrative Analyst and an Administrative Specialist II. In addition, the following positions have been added to the Director's Office: an ADEQ Water Division Manager; an ADEQ Inspector Supervisor; two ADEQ Branch Managers; and an ADEQ Director of Special Projects (see attached 2018 Director's Office List).

Salaries

According to the Transparency website, there also has been a significant increase in the number of high-paid employees between 2015 and 2018. In 2015, five employees of ADEQ made more than \$85,000/year (the director, chief deputy director, deputy director, and two career employees). In 2018, 13 employees now make over \$85,000/year. Of these 13 employees, it appears that only 2 have worked more than 10 years at ADEQ.

Other Changes

In 2015, ADEQ consisted of the Director's Office and 12 Divisions-Air, Water, Hazardous Waste, Solid Waste, Regulated Storage Tanks, Mining, Fiscal, Legal, Public Outreach and Assistance, Computer Services, and Tech Services. Division chiefs served as senior managers for each of these divisions. Because of one vacancy (Air), there were 11 division chiefs in 2015. Of those 11 division chiefs, 1 still remains today over her original division (Tech Services), 8 are no longer with ADEQ, one division chief who was over Hazardous Waste is now working in the Tire Accountability Program and, I understand, the last division chief (Mining) is in a state of transition to another position.

In 2015, there were organization charts for the agency which outlined who worked where and for whom. In 2018, there are no organization charts, not even for the agency's three main Offices created by the Director in late 2015-Air, Water, and Land. Although draft organization charts can be obtained through the Arkansas Freedom of Information Act, no final versions are available-likely due to the continual re-organization of the agency, which can have a somewhat dizzying effect on both those inside and outside the agency.

Hey... Where did everybody go?

While the Director's Office multiplied to over 3 times that of the Office's 2015 number, and the total salaries (not including fringe) for the Director's Office alone rose from \$514,590 in 2015 to \$1,151,604 in 2018, the overall agency's budget remained flat. So how did the agency pay for all the changes in staff and increased salaries?

In ADEQ's appropriation for 2015, the agency was stated to have 420 employees (Act 1001 of 2015). In 2017, ADEQ's appropriation enacted by the state legislature reported the number of employees to be 403 (Act 1001 of 2017).¹ Seventeen positions were eliminated between 2015 and 2017. Further, according to the response to a Freedom of Information Act request, as of January 1, 2017, ADEQ had approximately 86 unfilled positions, accounting for a salary savings of about \$2,877,134 (see attached). And, according to another response to a Freedom of Information Act request, as of January 1, 2018, ADEQ again had approximately 84 unfilled positions, accounting for a salary savings of about \$3,530,995 (see attached). The unfilled positions included inspectors, engineers, ecologists, enforcement analysts, and administrative staff, among others. The positions and numbers changed from 2017 to 2018, but both lists of unfilled positions included the type of staff one might think of as doing the actual work of the agency. Adding the 85 unfilled positions to the 17 eliminated positions yields a total of 102 missing employees. Put another way, almost one-quarter of the agency's 2015 work force seemed to be missing at the beginning of both 2017 and 2018. Although I hope I am wrong, it appears that a significant portion of ADEQ's working staff might have been sacrificed to support the management reinvented at ADEQ since 2015.

¹ During the 2017 legislative session, the Office of Energy was transferred to ADEQ, so 11 new positions were added to ADEQ, bringing the total number of employees listed in ADEQ's 2018 appropriation to 414 (see Act 254 of 2018).

Impacts?

The remarkable and ongoing sea-change in ADEQ's work force begs the question, "is there any discernible impact on agency productivity?" According to the State's Transparency page, ADEQ's revenues in fiscal year 2015 were \$49,303,833.33 (see attached FY2015 Revenues). ADEQ's revenues in fiscal year 2017 were \$38,438,866.92 (see attached FY2017 Revenues). That appears to be a \$10,864,967 drop in revenue.

Another, albeit less accurate, indicator of activity might be the collection of penalties. Under state law, administrative penalties are assessed against responsible parties who fail to comply with state environmental laws and regulations. These penalties are intended to provide disincentives to violate state laws and regulations. Any penalties collected from violators are placed in the Remedial Action Trust Fund, which is used to pay for responses to emergencies and other actions that address the presence of hazardous substances posing a threat to human health or the environment. According to the Transparency website, the penalties collected by ADEQ in fiscal year 2015 totaled \$661,652.45 (see attached FY2015 Penalties). In fiscal year 2017, the total penalties collected were \$328,286.06 (see attached FY2017 Penalties).

Concluding Remarks

This brief review is not intended to be exhaustive and does not begin to capture all the changes at ADEQ over the last two-to- three years. But this brief review is intended to raise the question, "how can this agency fund, staff, and house an entirely new administrative program?"

ADEQ has no experience with any trading programs and creating a trading program before understanding the staffing requirements and costs to implement and enforce such a program, again places the cart before the horse. Unfortunately, evaluating the impact of a program new to ADEQ while the agency itself is undergoing a titanic transformation, may not be a realistic exercise.

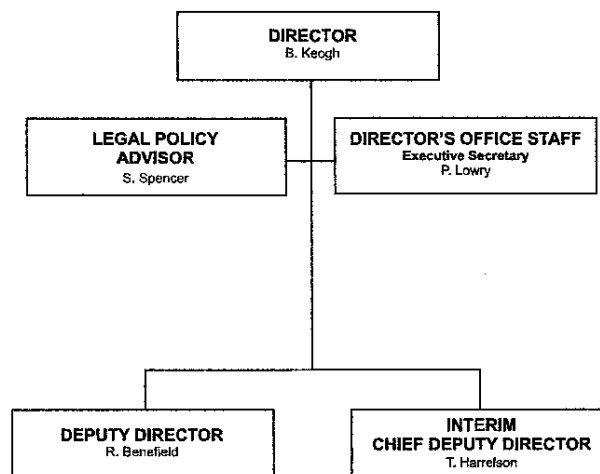
In conclusion, it is important to note that I support the concept of nutrient trading as a tool for providing economic incentives to reduce nutrients by those sources that can most easily achieve the reductions. But I do not think the mechanisms needed to allow, complete, and enforce a complex trading program are sufficiently articulated in the proposed Regulation 37. Other commenters have suggested a regional pilot program to address the regional issues in Northwest Arkansas. Such a pilot program could go a long way toward informing the Arkansas Department of Environmental Quality, the Arkansas Pollution Control and Ecology Commission, and the public about the mechanisms, safeguards, and procedures required to implement a successful trading program that is protective of water quality and its designated uses. Accordingly, I ask that this regulation not be adopted by the Commission at this time.

Again, thank you for the opportunity to provide these comments.

Sincerely,
Ellen Carpenter

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

Director's Office Personnel Chart



[A-Z Topic Index](#)

Agency Staff Directory

Staff Information

Division:

Name:

Phone:

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Note: This information is updated nightly.

▲ Name	▲ Phone	▲ Division	▲ Title
Blanz, Bob	(501) 682-0929	Directors Office	ADEQ Water Division Manager
Cook, Nathan	(501) 682-0734	Directors Office	ADEQ Deputy Director
Davis, Donnally	(501) 682-0889	Directors Office	ADEQ Branch Manager
Dings, Sharnea	(501) 683-2789	Directors Office	Legal Services Specialist
Grappe, Michael	(501) 682-0647	Directors Office	ADEQ Director of Special Projects
Hill, Jonathan	(501) 683-3001	Directors Office	Administrative Analyst
Hopkins, Andrea	(501) 683-3469	Directors Office	ADEQ Inspector Supervisor
Kelley, Angela	(501) 682-0959	Directors Office	Executive Asst to the Director
Keogh, Becky	(501) 682-0959	Directors Office	ADEQ Director
Linck, Julie	(501) 682-0959	Directors Office	ADEQ Senior Deputy Director
Nitschke, Karen	(501) 682-0744	Directors Office	Administrative Specialist II
Osborne, Caleb	(501) 682-0655	Directors Office	ADEQ Deputy Director
Partman, Mona	(501) 682-0890	Directors Office	ADEQ Branch Manager
Robinson, Kelly	(501) 682-0916	Directors Office	Legal Services Specialist
Rouse, Mitch	(501) 682-2287	Directors Office	General Counsel
Spencer, Stuart	(501) 682-0750	Directors Office	ADEQ Deputy Director
Thompson, Beth	(501) 682-0907	Directors Office	Executive Asst to the Director
White, Kevin	(501) 682-0962	Directors Office	ADEQ Deputy Director - Land Resources

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ADEQ
AR KANSAS
Department of Environmental Quality

5301 Northshore Drive
North Little Rock, AR 72118-5317

Phone: 501-682-0744

Helpline: 501-682-0923

Toll-Free: 888-233-0326

[Contact Us](#)

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Position Number	CG/DG Job	CG/DG Grade	Crossgrade/Downgrade Title	Authorized Job	Authorized Grade
22079739				A089C	C116
22079741				A052C	C121
22091079				X186C	C118
22091169				G034C	C127
22091282				G034C	C127
22079743				G063C	C125
22090923				G063C	C125
22091104				G063C	C125
22091296				G063C	C125
22091052				X075C	C119
22091078				X075C	C119
22090962				X059C	C120
22151198				X059C	C120
22091039				X093C	C118
22091041				X093C	C118
22091050	A075C	C118	FINANCIAL ANALYST I	X093C	C118
22091194				X093C	C118
22091201				X093C	C118
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22134038				X093C	C118
22151202				X093C	C118
22115281				G030C	C127
22076438	S046C	C113	MAINTENANCE TECHNICIAN	C037C	C115
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22090937				C073C	C109
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22090932	X036C	C122	ADEQ INSPECTOR SUPERVISOR	L028C	C122
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22090870	B119C	C103	LAB ASSISTANT	9999	9999
22090872	B119C	C103	LAB ASSISTANT	9999	9999
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22134891				5556	5556
22134892				5556	5556
22134893				5556	5556

Authorized Title	Annual Salary
ACCOUNTANT I	\$30,713
ACCOUNTING COORDINATOR	\$39,199
ADEQ AIR COMPLIANCE MONITOR	\$33,861
ADEQ ASST AIR/WATER DIVISION MANAGER	\$52,530
ADEQ ASST AIR/WATER DIVISION MANAGER	\$47,646
ADEQ BRANCH MANAGER	\$47,646
ADEQ BRANCH MANAGER	\$47,646
ADEQ BRANCH MANAGER	\$47,646
ADEQ BRANCH MANAGER	\$47,646
ADEQ ENFORCEMENT ANALYST	\$35,554
ADEQ ENFORCEMENT ANALYST	\$37,332
ADEQ ENFORCEMENT COORDINATOR	\$37,332
ADEQ ENFORCEMENT COORDINATOR	\$33,861
ADEQ INSPECTOR	\$33,861
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ADEQ REGULATED STORAGE TANKS DIV MANAGER	\$52,530
ADMINISTRATIVE ANALYST	\$26,531
ADMINISTRATIVE ANALYST	\$29,251
ADMINISTRATIVE SPECIALIST II	\$21,827
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ATTORNEY SPECIALIST	\$50,029

[illegible]

[illegible]

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22091294			IT06
22090971			IT05
22091132			IT05
22091016			IT04
22091097			GS13
22169721			GS12
22091299			GS12
22090921			GS12
22115277			GS12
22091261	GS10	ADEQ BRANCH MANAGER	GS11
22091291			GS11
22090953	GS10	ADEQ BRANCH MANAGER	GS11
22091254	GS09	ENGINEER	GS11
22091126	GS09	ENGINEER	GS10
22091296			GS10
22169723	GS09	GEOLOGY SUPERVISOR	GS10
22079741			GS09
22091129	GS09	FISCAL SUPPORT MANAGER	GS09
22091137			GS09
22091267			GS09
22091270			GS09
22091059	GS09	GRANTS MANAGER	GS09
22091251	GS07	ENVIRONMENTAL PROGRAM COORDINATOR	GS07
22129296			GS07
22091279			GS07
22115270			GS07
22100108			GS07
22143383			GS07
22090952			GS07
22091008			GS07
22143459			GS07
22091130	GS07	FINANCIAL ANALYST I	GS07
22091047			GS06
22091272			GS06
22079735			GS06
22090903			GS06
22090931			GS06
22091039	GS06	ADEQ ENFORCEMENT ANALYST	GS06
22091050			GS06
22091093			GS06
22091111			GS06
22091197			GS06
22091198			GS06
22091200			GS06
22091202			GS06
22091250			GS06
22134038			GS06
22091136			GS06
22091186			GS06

22115273		GS06
22134036		GS06
22169725		GS06
22090967		GS06
22091191		GS06
22090970		GS06
22090958		GS04
22090960		GS04
22090974		GS04
22090991		GS04
22091003		GS04
22091013		GS04
22091035		GS04
22091155		GS04
22091161		GS04
22091178		GS04
22091210		GS04
22143464		GS04
22091238		GS04
22090928		GS03
22091082		GS03
22091133		GS03
22091171		GS03
22076442	GS12	ADEQ SOLID WASTE DIVISION MANAGER
22076443	GS06	ADMINISTRATIVE ANALYST
22076444	GS06	ADMINISTRATIVE ANALYST
22076445	GS06	ADMINISTRATIVE ANALYST
22076448		9999
22076449		9999
22076450	GS06	LEGAL SERVICES SPECIALIST
22076451		9999
22076452		9999
22076453		9999
22076454	GS12	ADEQ SOLID WASTE DIVISION MANAGER
22076456		9999
22076458	GS04	ADMINISTRATIVE SPECIALIST III
22076459		9999
22090849		9999
22090850		9999
22090851		9999
22090852		9999
22090853		9999
22090854		9999
22090855		9999
22090856		9999
22090857		9999
22090858		9999
22090859		9999
22090860		9999
22090861		9999
22090862		9999
22090863	GS01	LAB ASSISTANT
22090864		9999
22090866		9999
22090867		9999

22090868		9999
22090870		9999
22090872		9999
22090873 GS15	ADEQ DEPUTY DIRECTOR	9999
22090875		9999
22090877		9999
22090878 GS04	ADMINISTRATIVE SPECIALIST III	9999
22090879 GS04	ADMINISTRATIVE SPECIALIST III	9999
22090880		9999
22090881		9999
22090882		9999
22090883		9999
22090884		9999
22090885		9999
22090886		9999
22090887		9999
22090888		9999
22090889		9999
22090890		9999
22090891		9999
22090892		9999
22090893		9999
22090894		9999
22090895		9999
22090896		9999
22090897		9999
22134671		5556
22134686		5556
22134888		5556
22134889		5556
22134890		5556
22134891		5556
22134892		5556
22134893		5556
22134895		5555

Authorized Title	Annual Salary
INFORMATION SYSTEMS COORDINATOR	\$64,445.00
NETWORK SUPPORT SPECIALIST	\$57,755.00
SOFTWARE SUPPORT ANALYST	\$51,762.00
SOFTWARE SUPPORT ANALYST	\$51,762.00
INFORMATION SYSTEMS ANALYST	\$46,391.00
ADEQ ENGINEER P.E. BRANCH MANAGER	\$77,862.00
ADEQ FINANICAL MANAGER	\$69,776.00
ADEQ SOLID WASTE DIVISION MANAGER	\$69,776.00
ENGINEER SUPERVISOR	\$69,776.00
FISCAL DIVISION MANAGER	\$69,776.00
AGENCY HUMAN RESOURCES MANAGER	\$62,531.00
ATTORNEY SPECIALIST	\$62,531.00
ENGINEER, P.E.	\$56,039.00
ENGINEER, P.E.	\$50,222.00
ADEQ BRANCH MANAGER	\$50,222.00
ADEQ BRANCH MANAGER	\$56,039.00
ADEQ TIRE FUND COORDINATOR	\$56,039.00
ACCOUNTING COORDINATOR	\$50,222.00
ENGINEER	\$50,222.00
ENGINEER	\$50,222.00
ENGINEER	\$50,222.00
ENGINEER	\$50,222.00
GEOLOGY SUPERVISOR	\$50,222.00
ADEQ ENFORCEMENT COORDINATOR	\$40,340.00
ADEQ ENFORCEMENT COORDINATOR	\$40,340.00
ECOLOGIST	\$40,340.00
ECOLOGIST	\$40,340.00
ENERGY PROGRAM COORDINATOR	\$40,340.00
ENERGY PROGRAM MANAGER	\$40,340.00
ENVIRONMENTAL PROGRAM COORDINATOR	\$40,340.00
ENVIRONMENTAL PROGRAM COORDINATOR	\$40,340.00
ENVIRONMENTAL PROGRAM COORDINATOR	\$40,340.00
PUBLIC INFORMATION COORDINATOR	\$40,340.00
ADEQ ENFORCEMENT ANALYST	\$36,155.00
ADEQ ENFORCEMENT ANALYST	\$36,155.00
ADEQ INSPECTOR	\$36,155.00
ADEQ INSPECTOR	\$36,155.00
ADEQ INSPECTOR	\$36,155.00
ADEQ INSPECTOR	\$36,155.00
ADEQ INSPECTOR	\$36,155.00
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ADEQ INSPECTOR	\$36,155.00
ADEQ INSPECTOR	\$36,155.00
ADMINISTRATIVE ANALYST	\$36,155.00
ADMINISTRATIVE ANALYST	\$36,155.00

ADMINISTRATIVE ANALYST	\$36,155.00
ADMINISTRATIVE ANALYST	\$36,155.00
ADMINISTRATIVE ANALYST	\$36,155.00
LEGAL SERVICES SPECIALIST	\$36,155.00
LEGAL SERVICES SPECIALIST	\$36,155.00
POLICY DEVELOPMENT COORDINATOR	\$36,155.00
ADMINISTRATIVE SPECIALIST III	\$29,046.00
ADMINISTRATIVE SPECIALIST III	\$29,046.00
ADMINISTRATIVE SPECIALIST III	\$29,046.00
ADMINISTRATIVE SPECIALIST III	\$29,046.00
ADMINISTRATIVE SPECIALIST III	\$29,046.00
ADMINISTRATIVE SPECIALIST III	\$29,046.00
ADMINISTRATIVE SPECIALIST III	\$29,046.00
ADMINISTRATIVE SPECIALIST III	\$29,046.00
ADMINISTRATIVE SPECIALIST III	\$29,046.00
ADMINISTRATIVE SPECIALIST III	\$29,046.00
ADMINISTRATIVE SPECIALIST III	\$29,046.00
ADMINISTRATIVE SPECIALIST III	\$29,046.00
HUMAN RESOURCES SPECIALIST	\$29,046.00
ADMINISTRATIVE SPECIALIST II	\$26,034.00
ADMINISTRATIVE SPECIALIST II	\$26,034.00
ADMINISTRATIVE SPECIALIST II	\$26,034.00
ADMINISTRATIVE SPECIALIST II	\$26,034.00
EXTRA HELP	\$69,766.00
EXTRA HELP	\$36,155.00
EXTRA HELP	\$36,155.00
EXTRA HELP	\$36,155.00
EXTRA HELP	\$0.00
EXTRA HELP	\$0.00
EXTRA HELP	\$36,155.00
EXTRA HELP	\$0.00
EXTRA HELP	\$0.00
EXTRA HELP	\$0.00
EXTRA HELP	\$0.00
EXTRA HELP	\$69,776.00
EXTRA HELP	\$0.00
EXTRA HELP	\$29,046.00
EXTRA HELP	\$0.00
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EXTRA HELP	\$0.00
EXTRA HELP	\$0.00
EXTRA HELP	\$0.00
EXTRA HELP	\$0.00
EXTRA HELP	\$0.00
EXTRA HELP	\$22,000.00
EXTRA HELP	\$0.00
EXTRA HELP	\$0.00
EXTRA HELP	\$0.00

EXTRA HELP	\$0.00
EXTRA HELP	\$0.00
EXTRA HELP	\$0.00
EXTRA HELP	\$96,960.00
EXTRA HELP	\$0.00
EXTRA HELP	\$0.00
EXTRA HELP	\$29,046.00
EXTRA HELP	\$29,046.00
EXTRA HELP	\$0.00
EXTRA HELP	\$0.00
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EXTRA HELP	\$0.00
EXTRA HELP	\$0.00
EXTRA HELP	\$0.00
EXTRA HELP	\$0.00
EXTRA HELP	\$0.00
REGULAR STATE EMPLOYEE BOARD MEMBER	\$0.00
REGULAR STATE EMPLOYEE BOARD MEMBER	\$0.00
REGULAR STATE EMPLOYEE BOARD MEMBER	\$0.00
REGULAR STATE EMPLOYEE BOARD MEMBER	\$0.00
REGULAR STATE EMPLOYEE BOARD MEMBER	\$0.00
REGULAR STATE EMPLOYEE BOARD MEMBER	\$0.00
REGULAR STATE EMPLOYEE BOARD MEMBER	\$0.00
REGULAR STATE EMPLOYEE BOARD MEMBER	\$0.00
NON STATE EMPLOYEE BOARD MEMBERS	\$0.00

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Revenues

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Revenues by category for agency: **DEPT OF ENVIRONMENTAL QUALITY**

Select a category to see the details

Filter:

Category	Amount
POLLUTION CONTROL PERMIT FEE	\$11,386,322.80
FEDERAL GRANTS/REIMBURSEMENTS §19-6-601	\$10,854,061.40
WASTE MANAGEMENT RECYCLE	\$7,595,919.85
PETROLEUM ENVIRONMENT FEE §8-7-906	\$7,249,064.15
WASTE TIRE FEES §19-6-301(165)	\$4,826,365.55
GENERAL REVENUE DISTRIBUTION TRANSFERS IN DFA ONLY	\$4,412,740.00
OTHER REFUNDS/REIMBURSEMENTS §19-6-701	\$3,459,050.79
HAZARDOUS WASTE	\$1,302,925.37
WASTE TIRE DISTRICTS §19-6-301(165)	\$681,832.68
PENALTIES	\$668,227.45

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Revenues

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Revenues

Revenues are funds that the State is legally allowed to collect in order to finance the State's obligations. Examples of revenues are taxes, fees, fines, or grants. Select a link to learn more about state revenues.

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You are currently viewing data for 2015.

View another fiscal year's data: 2015

Revenue includes tax dollars, but it also includes fees, fines, grants and other sources of revenue. Revenue data is updated daily.

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Revenues

[Overview](#)[By Source](#)[By Type](#)[By Function](#)[By Agency](#)

Revenues by agency

Select an agency to see the categories

Filter: **env**

Agency	Amount
DEPT OF ENVIRONMENTAL QUALITY	\$49,303,833.33

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Revenues

[Overview](#)[By Source](#)[By Type](#)[By Function](#)[By Agency](#)[By Agency](#) > Agency : DEPT OF ENVIRONMENTAL QUALITY

Revenues by category for agency: **DEPT OF ENVIRONMENTAL QUALITY**

Select a category to see the details

Filter:

Category	Amount
HAZARDOUS WASTE FEES §8-7-509	\$471,600.00
INTER AGENCY TRANSFER IN FROM CI 04	\$350,000.00
PENALTIES	\$343,243.06
ABOVE GROUND TANK	\$308,685.00
OTHER REFUNDS/REIMBURSEMENTS §19-6-701	\$292,851.78
ASBESTOS CERT/LICENSE §19-6-301(130)	\$292,620.00
OTHER FEES	\$196,204.19
INTEREST CERTIFICATE OF DEPOSIT	\$123,813.81
LICENSES	\$93,240.00
SALVAGE AUCTION ID CARDS	\$64,455.50

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Revenues

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View another fiscal year's data: 2017

Revenues

Revenues are funds that the State is legally allowed to collect in order to finance the State's obligations. Examples of revenues are taxes, fees, fines, or grants. Select a link to learn more about state revenues.

Revenue includes tax dollars, but it also includes fees, fines, grants and other sources of revenue. Revenue data is updated daily.

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Revenues

[Overview](#)[By Source](#)[By Type](#)[By Function](#)[By Agency](#)

Revenues by agency

Select an agency to see the categories

Filter: env

Agency	Amount
DEPT OF ENVIRONMENTAL QUALITY	\$39,816,717.39

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