



Reuse Permit Fees

Rationale and Proposal

1 Introduction

1.1 Purpose and Scope

This discussion paper presents the Idaho Department of Environmental Quality's (DEQ) estimates for personnel and budget resource needs based on numbers for recycled water reuse permitting, compliance, inspections, and enforcement. DEQ conducted an analysis of the available data regarding the number of reuse permits issued between 2004 and present, along with data representing the time devoted to implementing the program. The analysis results will be discussed along with historical funding mechanisms and future predictions to provide a background for proposing a permit fee for reuse permits. DEQ proposes to introduce a fee structure for reuse permits to secure a stable funding source, enabling DEQ to maintain the program in line with growing needs.

1.2 Background

Recycled water, or reuse, permits have had a long history in Idaho. Regulations establishing the program were first promulgated in 1988. Land application of treated effluent originally gained favor in the 1970s after the promulgation of the Clean Water Act and its national objective to eliminate the discharge of pollutants into the nation's waterways. Over the years, Idaho's reuse permitting program has grown into a first-class program providing an alternative approach to discharging treated effluent into Idaho's pristine waterways, beneficial reuse of water, and recycling important nutrients back into Idaho's soils.

The program has been funded historically by a combination of federal grants (Clean Water Act) and state general funds. Over the last 20 years, the federal grant has remained relatively flat in nominal terms. However, when adjusting these figures for inflation using the Consumer Price Index (CPI), a clear trend emerges: the real value of the federal grant has decreased over time, indicating a reduction in the buying power of these funds. This reduction directly impacts the program's ability to cover increasing operational costs, including expenditures for reuse permit processing, reissuance, and compliance assistance and review.

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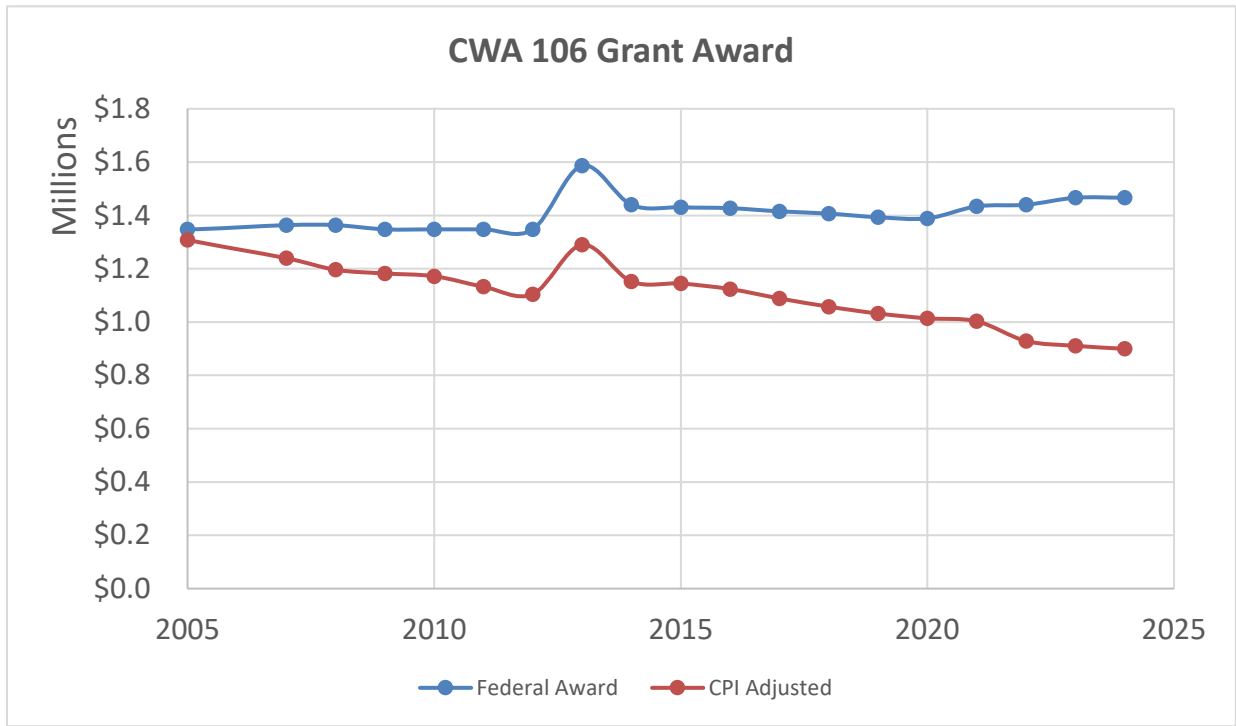


Figure 1: Federal Clean Water Act Grant awards by calendar year.

Figure 1 demonstrates the comparison between the nominal value of annual grant awards, blue line, and their real value over time when adjusted for inflation, red line, using 2004 as the baseline year. This decline in real value demonstrates how, despite the constant nominal award, the purchasing power of the grant dollars decreases due to inflationary pressures. Thus, even though the grant amount stays the same in nominal terms, its effectiveness in covering costs or investments diminishes over time.

In addition to the reduction in spending power, Idaho is witnessing a significant demographic shift due to forecasted population growth, positioning it as one of the fastest-growing states in the U.S. With an expected population surpassing 2 million by 2031¹, the state faces increased demand for reuse permits, necessitating the expansion and enhancement of its reuse program. The growth trajectory showcases a notable annual increase, particularly in southwestern Idaho, which is anticipated to witness the most significant growth. This pattern suggests a trend towards urbanization, especially around the Boise metropolitan area which is anticipated to accommodate a large portion of this growth². Such a demographic evolution underlines the importance of strategic planning in sanitation infrastructure to manage the growth sustainably.

¹ <https://lmi.idaho.gov/pressrelease/idaho-population-projected-to-top-2-million-by-2031/>

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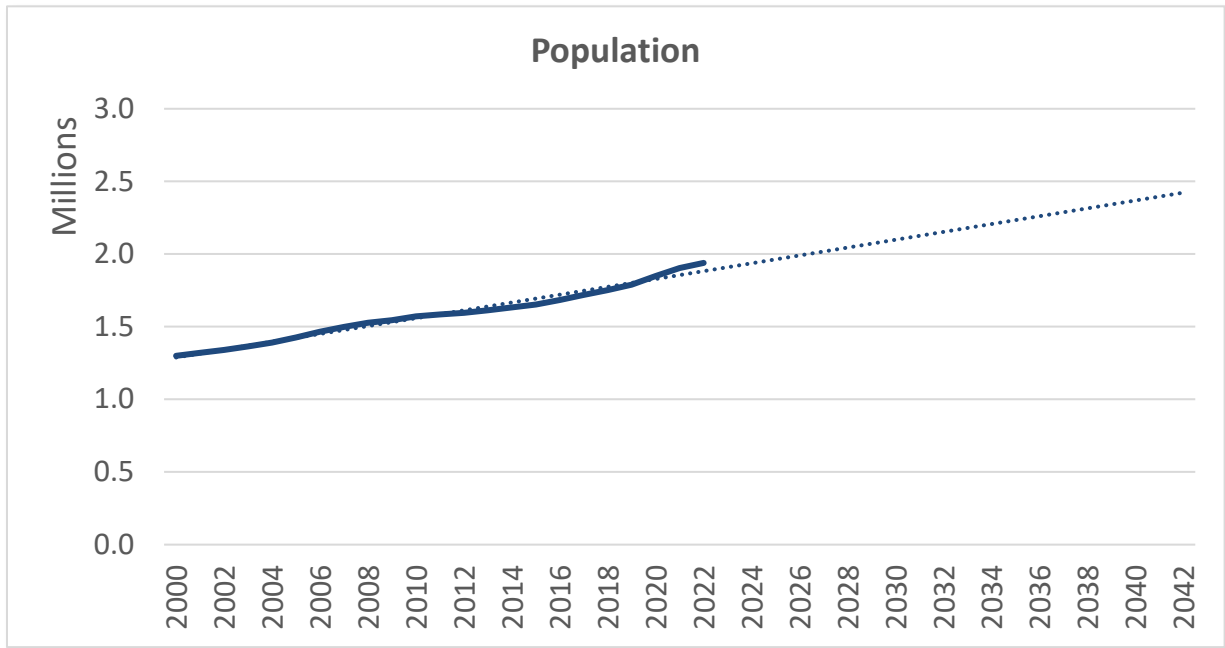


Figure 2: Population estimate (solid line) from Census Bureau and forecasted population (dashed line). Data source: <https://www.neilsberg.com/insights/idaho-population-by-year/>

The reuse program’s dependence on federal and state funding presents a risk of potential budget cuts based on state revenues and political shifts which may disrupt services and hinders long-term planning. This reliance constrains the program's sustainability and ability to respond effectively to emerging needs, thereby limiting the ability to serve its constituents effectively and consistently.

2 Analysis of Current Expenditures and Service Hours

DEQ’s responsibility under the wastewater program is to provide services including permits for surface water discharges (IPDES), reuse permits, and engineering plan reviews. Often, DEQ engineering staff are tasked with administering both the reuse program and engineering plan reviews. The reuse program and engineering reviews have been active and supported by DEQ for the last 3 decades using the Clean Water Act § 106 grant described in Section 1.2. In the last 20 years, the number of reuse permits that the agency issues and maintains has gone from 65 in 2000 to nearly 150 in 2023 (Figure 3), a doubling of permits in just over 20 years. Along with that increase in workload, the agency has seen a significant increase in the number of plan reviews. Data in this area only goes back reliably to 2010, but as shown in Figure 4, the number of plan reviews has nearly doubled in the last decade. Combined, the reuse program and engineering reviews have seen double the workload while the Clean Water Act funding has not kept pace. This means that the state general fund contributions associated with these programs have had to grow significantly. See Figure 5. DEQ expects the demand associated with reuse permits and engineering reviews to continue to rise as increased population drives increases in new or expanded water infrastructure.

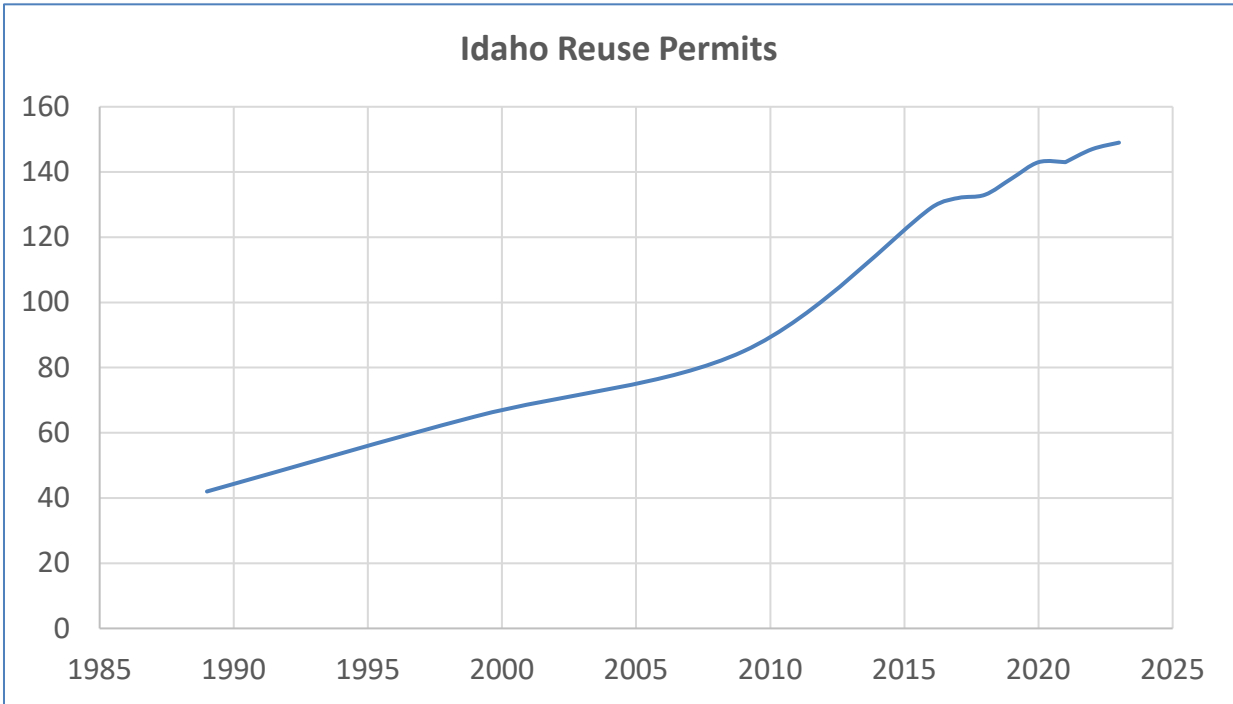


Figure 3: Number of active reuse permits DEQ maintains each year.

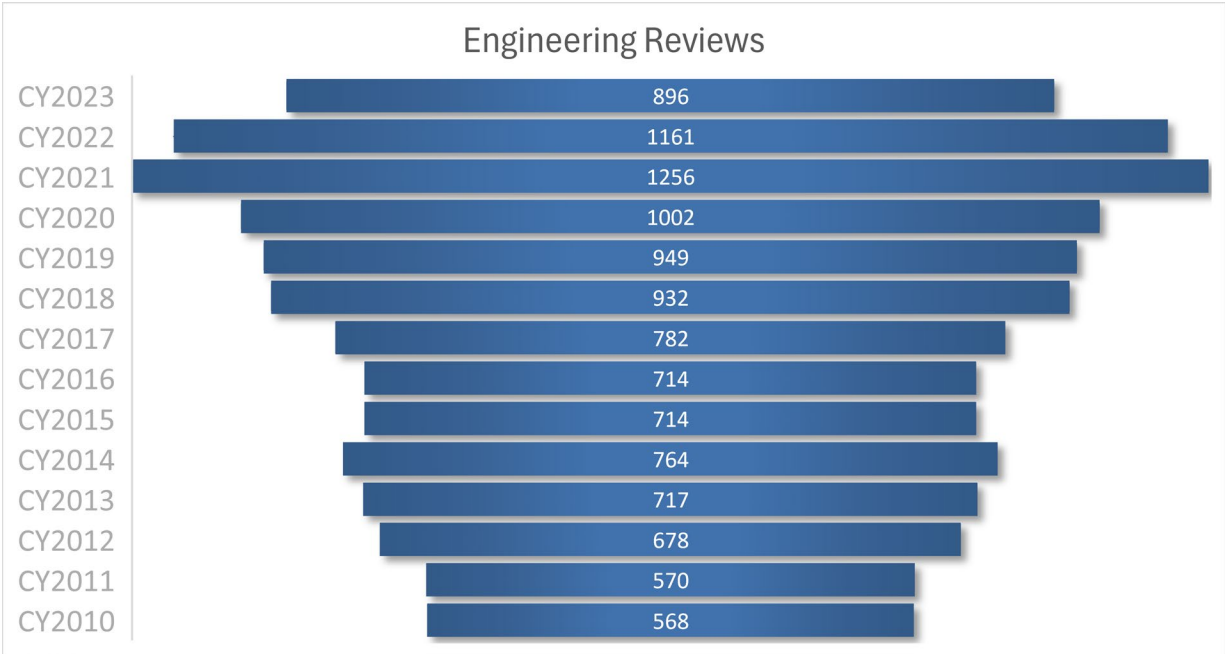


Figure 4: Total number of engineering reviews completed by DEQ staff. This includes plans and specifications, O&M manuals, facility plans, preliminary engineering reports, record drawings, and all other engineering report types.

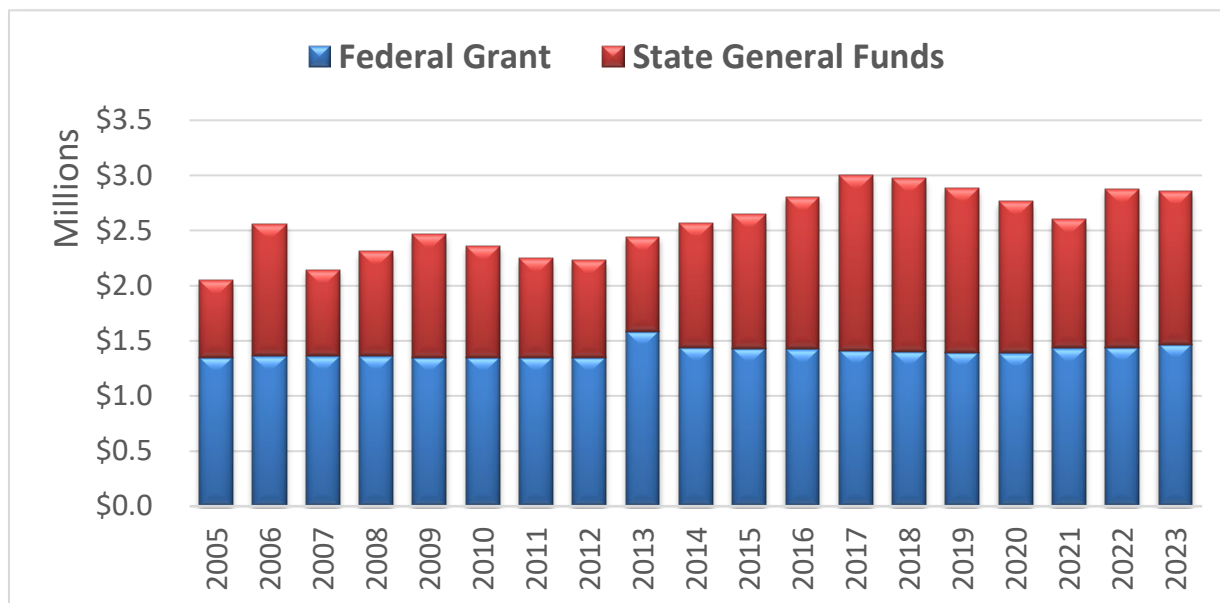


Figure 5: Sources of funding for reuse permit and engineering review programs.

Over the last 20 years, expenses associated with the reuse program alone have increased, for example going from \$380K in 2004 to over \$1M in 2023. Between 2004 and 2023, there was a 178.31% increase in expenses. The reuse program costs were 2.78 times as much as the program costs in 2004. This increase in expenditure is in part due to the growth in the number of active permits from 65 in 2004 to 148 in 2023, alongside a corresponding increase in hours spent managing these permits. Between 2004 and 2023, full time equivalents working in the reuse program, excluding engineering project reviews, ranged from as low as 8.5 up to 14. Coupling historical information regarding the amount of time spent in the reuse permitting program with a forecast of the permitting efforts coming over the next 10 years, annual estimates for staff time in the reuse permit program are between 22,000 and 24,000 (or 10.5 to 11.5 FTE). Appendix A provides a detailed description of these estimates.

The escalation in population and subsequent strain on water infrastructure underscore the critical role of efficient program management, particularly for reuse permits. The increasing workload, highlighted by the rising number of permits needing renewal, underscores the urgent need for efficient and sustainable management practices. With engineering staff juggling between infrastructure projects and permit drafting, prioritizing tasks becomes challenging. This dynamic emphasizes the importance of recalibrating resources and implementing strategies to ensure the reuse permits program can effectively support Idaho's growth and the imperative of sustainable water management.

3 Reasons for Fee Implementation

The reliance on state general funds to support the bulk of the reuse program's costs combined with the growing number of permits and the permit management hours imposes economic pressure on DEQ's budget.

Coupled with Idaho's rapid population growth, there's an escalating demand to expand water infrastructure straining the program's resources. The fact that most reuse permit writers are regional office engineering staff, who are also responsible for reviewing and approving engineering documents as well as conducting inspections and reviewing annual report, adds a layer of complexity to the program. These staff members face a challenging balancing act, as the urgency and precedence of engineering reviews for expanding water infrastructure often overshadow the task of drafting permits, leading to delays and backlogs in permit issuance.

Beginning in 2011, DEQ instituted a longer permit term for reuse permits whose operators were in good standing. DEQ may issue a reuse permit for up to 10 years. However, extending that permit term is resulting in a large slug of permits that will expire in the next 5 years (see Figure 6). Reissuing permits is critical to ensuring ongoing protection of Idaho's groundwater and surface water resources.

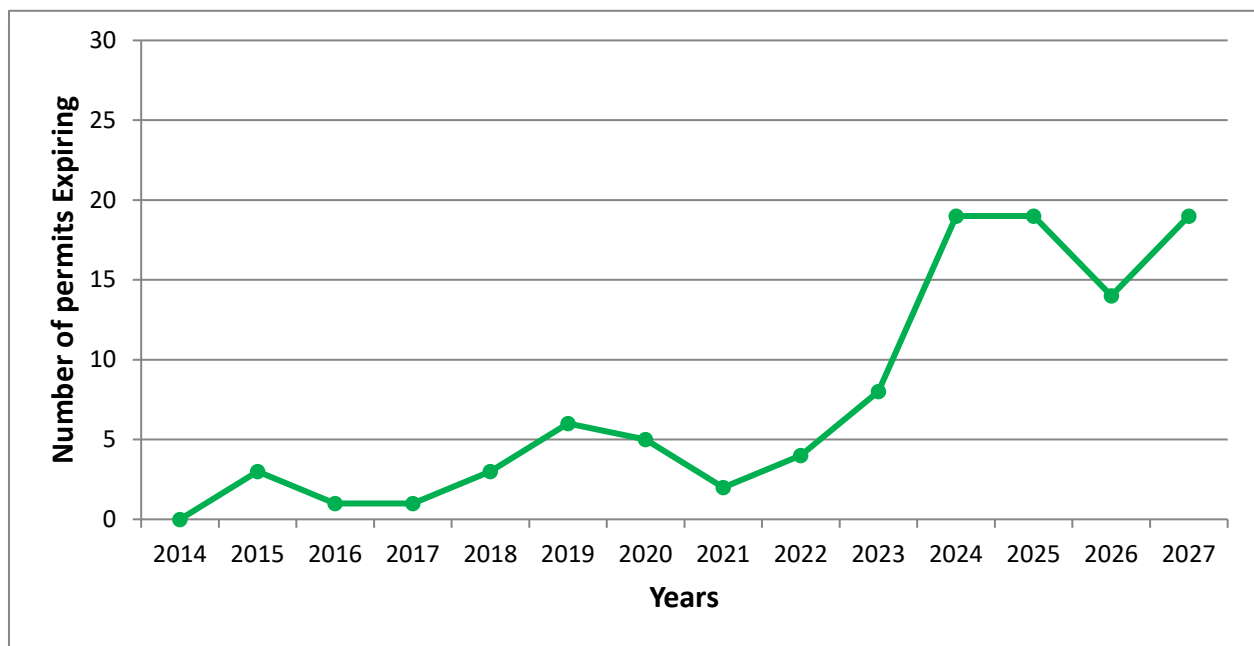


Figure 6: Distribution of reuse permit expiration dates.

Engineering staff, tasked with both reviewing critical infrastructure projects and drafting reuse permits, find themselves at a crossroads. The necessity of prioritizing engineering reviews for infrastructure means that drafting permits, despite its importance for sustainable water management, is increasingly sidelined. This situation is exacerbated by the rising number of permits expiring and needing review in the upcoming years, which is projected to increase from roughly 7-8 to over 20. This uptick signifies not only a growing workload but also highlights the increasing importance of recycled water as a resource that needs to be managed more efficiently and sustainably.

The reliance on state general funds to supplement the federal grant further underscores the program's financial sustainability challenges. With Idaho experiencing significant population growth, which is projected to continue in the coming years, the demand for reuse permits is

likely to increase further. This growth necessitates additional resources for the program to effectively manage the permitting process and ensure sustainable water use practices.

Implementing fees would provide a more sustainable and reliable funding source for the program, helping to offset the reduced buying power of the federal grant and the increasing operational costs. This approach would also align with conservative fiscal principles by reducing reliance on state general funds and ensuring that those who benefit from the program contribute to its costs.

3.1 Considerations for the Proposed Fee Model

Stable funding for the reuse program will enable DEQ to invest in additional resources, including staffing and technological advancements, essential for handling the increasing demand for reuse permits. This financial stability is critical for enhancing the program's responsiveness and efficiency, ensuring that permit applications, inspections, and compliance monitoring are conducted in a timely and effective manner. The anticipated improvements stem from the ability to plan and execute operational strategies with the assurance of consistent funding, thereby elevating the overall quality and reliability of services provided to municipalities, industries, and other stakeholders involved in sustainable water management practices.

For users of recycled water, the fee structure introduces a level of predictability and reliability that is paramount for long-term planning and investment in water recycling infrastructure. By establishing clear, upfront costs associated with permit applications and renewals, facilities can better forecast their operational budgets, reducing financial uncertainty. This predictability is especially beneficial for long-term projects and investments in water recycling capabilities, as it assures facilities of consistent regulatory conditions and support. Moreover, the reliability of the reuse program, underpinned by stable funding, means users can expect consistent quality in the regulatory oversight and assistance provided by the DEQ, facilitating more efficient and effective water recycling practices across Idaho.

The fee-based funding model is a cornerstone for the long-term sustainability of Idaho's reuse program. As the program faces increasing demands due to population growth and heightened environmental awareness, the need for a reliable funding source becomes increasingly apparent. The proposed fees ensure the program not only maintains its current level of service but also expands its capabilities in line with future water management challenges. This sustainable funding mechanism allows for ongoing program development, including enhancements in permit processing, compliance monitoring, and support services, thereby securing the program's role in supporting Idaho's water infrastructure well into the future.

A key consideration in the development of the fee structure is the principle of equity and affordability. It is essential that the fees do not impose undue financial burdens on smaller or less impactful facilities, which are equally vital for the ecosystem of sustainable water management in Idaho. To this end, the proposed fee structure is designed to be progressive, with adjustments based on the size and impact of the facility, ensuring that smaller entities face lower fees in recognition of their limited financial resources and smaller scale of operation. This

approach ensures that all stakeholders can participate in and benefit from the reuse program without facing prohibitive costs, thereby promoting widespread compliance and support for sustainable water management practices.

3.2 Potential Fee Structure

To ensure sustainable funding and continued success of Idaho's reuse program, a fee structure generating an annual revenue goal of \$200,000 is being proposed. This target essentially covers about 20% of the operational costs of the program ensuring long-term viability amidst growing demands. Recognizing the diverse needs and capacities of our users, three distinct fee structure proposals have been developed. Each is designed with the dual objectives of fairness and financial sustainability in mind, ensuring that the program can continue to support Idaho's environmental goals and water management needs effectively. These proposals take into account various factors, including the size and type of the facilities served by the program, with the intent to distribute the financial responsibility equitably among all stakeholders, while also offering flexibility to accommodate the specific circumstances of different users.

Inputs to each fee scenario calculation include the following facility numbers:

- 6 de minimis permits
- 39 industrial permits
- 6 municipal permits over 15,000
- 11 municipal permits between 1,000 and 15,000
- 28 municipal permits under 1,000
- 58 private or other permits

3.2.1 Fixed Annual Cost Fee Scenario

This proposal evaluates a fixed annual cost with no application fee.

Annual Fees:

Type	Fee	#	Total
De minimis Permits	\$500	6	\$3,000
Industrial	\$3,000	39	\$117,000
Municipal Over 15,000	\$3,000	6	\$18,000
Municipal Between 1,000 and 15,000	\$1,000	11	\$11,000
Municipal Under 1,000	\$500	28	\$14,000
Private or Other:	\$750	58	\$43,500

Total = \$206,500

This scenario takes into account the specific counts of each facility type, aiming to distribute the financial burden equitably while ensuring sufficient funding for program operations and development.

3.2.2 Permit Application Fee Scenario

With 20 permits issued or renewed each year:

Application Fee: To meet the \$200,000 goal solely through application fees, each of the 20 applications would originally need to contribute \$10,000. However, this may not be feasible or equitable across permit types. A more practical approach could involve a tiered application fee based on permit type complexity and impact, similar to the annual fee structure, but at a lower rate given it's a one-time fee for the application or renewal process. Permit modification requests would also be treated as a permit application.

3.2.3 Combined Scenario with Adjusted Fees Based on Facility Counts

Application Fee:

- Flat rate for all applications: \$550

Adjusted Annual Fees to achieve the remainder of the \$200,000 goal:

Type	Fee	#	Total
De minimis Permits	\$450	6	\$2,700
Industrial	\$2,800	39	\$109,000
Municipal Over 15,000	\$2,800	6	\$16,800
Municipal Between 1,000 and 15,000	\$900	11	\$9,900
Municipal Under 1,000	\$450	28	\$12,600
Private or Other:	\$650	58	\$37,700

Total = \$199,700

Rationale:

This adjusted scenario takes into account the specific counts of each facility type, aiming to distribute the financial burden equitably while ensuring sufficient funding for program operations and development. The application fee provides initial revenue, with annual fees generating sustainable funding. A significant amount of work goes into the application review and completeness determination which would be offset by the application fee. The remaining annual fee would offset costs associated with annual report review, compliance assistance, and inspections.

3.3 Impact on Stakeholders

The implementation of a fee structure for reuse permits necessitates an assessment of its impact on users across different sectors. This evaluation considers various factors, including the operational scale of facilities, the economic implications of the fees, and the overall benefits of continued access to a robust reuse program. While the fee introduces a new cost for users, it

also ensures the sustainability and enhancement of a program critical for supporting Idaho's long-term water management and environmental goals. The fees are structured to reflect the size and impact of different users, ensuring that larger entities, which potentially have a greater impact on water resources, contribute proportionately more. This approach aims to balance financial sustainability of the program with fairness to users, recognizing the essential role that access to recycled water plays in their operations.

Acknowledging the potential burden that fees might place on smaller facilities, strategies to minimize impact will be explored. Some initial proposals may include a sliding scale for fees based on the user's operational size and impact or phased payment plans to spread the cost over time. These measures aim to ensure equitable access to reuse permits, preventing financial barriers from hindering participation in sustainable water management practices.

The collected fees open a pathway for significant reinvestment into the reuse program, enabling a range of enhancements to further support users and the state's environmental objectives. This potential for reinvestment includes upgrading technology and systems for more efficient permit processing, expanding staff training and expertise to improve support and guidance for users, and funding research into water recycling techniques and practices. Moreover, a portion of the fees could be allocated towards developing educational and outreach programs to raise awareness about the benefits of recycled water, encouraging broader adoption of sustainable practices. Such reinvestments not only improve the program's capacity and effectiveness but also contribute to a cycle of continuous improvement, fostering innovation and sustainability in water management across Idaho.

4 Implementation Plan

This proposal aims to balance the need for reuse program funding with the economic realities of the various facilities it regulates, ensuring sustainability and support for Idaho's growing needs in water management and infrastructure development. DEQ is cognizant of facilities that may be affected by existing fee structures within the IPDES program. DEQ will likely not implement any fee schedule until 2026 which will provide the necessary time for municipalities and industry to provide feedback to the plan as well as prepare any necessary resources.

Below are some additional considerations for implementation for facilities impacted by multiple fee frameworks:

1. Discounted Fee for Dual Permit Holders

Introduce a discounted fee structure for facilities that hold permits in both the reuse program and the IPDES program. This discount acknowledges the financial burden of participating in multiple regulatory frameworks and encourages compliance.

2. Bundled Permitting Option

Offer a bundled permitting option that combines fee requirements from both the reuse and IPDES programs at a reduced total cost. This approach can streamline administrative processes

for both the facilities and the regulatory body, making compliance more manageable and cost-effective.

3. Staggered Payment Plans

For facilities impacted by dual permit fees, offer staggered or delayed payment plans that allow for the fees to be paid over a longer period. This flexibility can help manage the financial impact, especially for smaller municipalities.

5 Conclusion

In conclusion, the introduction of a fee structure for reuse permits represents a pivotal step towards securing the future of Idaho's reuse program. These proposed structures balance the necessity for financial viability with the principle of equitable contribution from all stakeholders, reflecting a commitment to both the program's longevity and the support of Idaho's diverse community of water users. As we move forward, stakeholder feedback and ongoing assessment will be crucial in refining and implementing the most effective fee structure, ensuring the reuse program remains a cornerstone of Idaho's environmental stewardship and sustainability efforts for years to come.

Appendix A. Resource Estimates

Permitting						
Activity	Permits/ Facilities Affected	Percent of Permits/Facilities Affected	Number of Permits/Facilit ies Affected	Required Effort (FTE hrs/permit or facility)	Total Required Effort for Line- Item (FTE hrs)	Total Costs for Line-Item
1. Program Planning, Management, and Oversight ¹	NA	NA	NA	NA	1,800	\$136,099
2. Rule and Guidance Development, Review, and Revision	NA	NA	NA	NA	1,800	\$122,281
3. Administration of Fee Program	NA	NA	NA	NA	714	\$37,875
4. Permit Issuance or renewal ²						
i. Industrial facilities	39	16.8%	6.55	425	2,784	\$149,644
ii. Municipal facilities	103	12.8%	13.18	400	5,272	\$283,402
iii. De minimis permits	6	10.0%	0.60	280	168	\$9,031
5. Permit Modifications						

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i. Industrial facilities	39	10.0%	3.90	10	39	\$2,096
ii. Municipal facilities	103	10.0%	10.30	10	103	\$5,537
iii. De minimis permits	6	10.0%	0.60	6	4	\$194
TOTAL Annual Workload and Cost for Permitting Activities					12,683	\$746,159
FTE Total:					7.0	

Compliance

Activity	Unit of Analysis	Number of ARs	Required Effort (FTE hrs/AR)	Other Costs (\$/AR)	Total Required Effort for Line-Item (FTE hrs)	Total Other Costs for Line-Item	Total Costs for Line-Item	
1. Review of Annual Reports (AR)	DMR	148	24	Not Applicable	3,552	Not Applicable	\$190,942	
Activity	Facilities of Concern	Percent of Facilities Affected	Number of Facilities Affected	Required Effort (FTE hrs/facility)	Other Costs (\$/facility)	Total Required Effort for Line-Item (FTE hrs)	Total Other Costs for Line-Item	Total Costs for Line-Item
2. Routine Compliance Inspections								
i. Industrial facilities	39	40.0%	15.6	40	\$500	624	\$7,800	\$41,344
ii. Municipal facilities	103	40.0%	41.2	40	\$500	1,648	\$20,600	\$109,190
iii. De Minimis permits	6	10.0%	0.6	25	\$500	15	\$300	\$1,106
3. Compliance Assistance (visit and other assistance)								
i. Industrial facilities	39	50.0%	19.5	40	\$500	780	\$9,750	\$0
ii. Municipal facilities	103	50.0%	51.5	40	\$500	2,060	\$25,750	\$51,680
iii. De Minimis permits	6	5.0%	0.3	25	\$500	8	\$150	\$136,488
TOTAL Annual Workload and Cost for Compliance Activities						8,687	\$64,350	\$530,749

FTE Total:	4.8
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Assistance to regulated and unregulated facilities to enhance the ability of these facilities to comply with regulations and protect public health includes: compliance assistance (e.g., permit development guidance, data submittal assistance, review of operations plans and quality assurance plans, etc.); technical assistance (e.g., on-site assistance and troubleshooting, assistance to non-NPDES facilities, outreach to technical and professional organizations, operator certification and continuing education, etc.); financial assistance (e.g., assistance with financial mgmt., loan applications, etc.); and capacity assurance.

Enforcement

Activity	Facilities of Concern	Percent of Facilities Affected	Number of Facilities Affected	Required Effort (FTE hrs/facility)	Total Required Effort for Line-Item (FTE hrs)	Total Annual Costs for Line-Item
1. Complaint Investigation	148	10.0%	14.80	32	474	\$25,459
2. Violation Response						
A. Enforcement Referral	148	10.0%	14.80	16	237	\$17,905
B. Follow-up response (e.g., NOV/compliance conference)	148	90.0%	13.32	28	373	\$28,200
C. Administrative orders (CAS or CO)	148	75.0%	29.25	24	702	\$53,079
D. Civil/criminal referral	148	1.0%	0.29	4	1	\$88
E. Post-referral follow-up	148	50.0%	0.15	50	7	\$553
TOTAL Annual Workload and Cost for Enforcement Activities					1,794	\$135,634

FTE Total:	1.0
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Year	Federal Award	State Match	Total Expenses against grant	Expenditures for Reuse Permits	Hours spent on Reuse Permits	Number of active permits
2005	\$1,347,800	\$700,166	\$2,097,966.32	\$648,166.90	17,611	
2007	\$1,363,500		\$2,559,734.79	\$730,464.27	20,818	
2008	\$1,363,500	\$778,914	\$2,142,413.56	\$668,544.04	19,284	
2009	\$1,347,675	\$949,009	\$2,312,509.06	\$895,837.67	25,542	85
2010	\$1,347,675	\$1,115,676	\$2,463,350.78	\$860,177.76	23,929	
2011	\$1,347,675	\$1,011,472	\$2,359,146.90	\$841,150.53	23,267	
2012	\$1,347,675	\$896,749	\$2,244,424.33	\$738,970.38	21,492	
2013	\$1,586,473	\$883,436	\$2,231,111.38	\$817,690.10	23,979	
2014	\$1,439,900	\$855,814	\$2,442,287.28	\$923,324.93	26,086	
2015	\$1,430,459	\$1,124,648	\$2,564,548.07	\$962,457.11	25,569	
2016	\$1,427,100	\$1,215,478	\$2,645,937.07	\$925,641.75	24,726	129
2017	\$1,415,200	\$1,378,733	\$2,805,833.13	\$1,030,741.25	26,291	132
2018	\$1,406,700	\$1,589,545	\$3,004,745.08	\$1,078,625.06	27,016	133
2019	\$1,393,100	\$1,573,391	\$2,980,091.35	\$1,108,160.31	26,288	138
2020	\$1,388,900	\$1,490,128	\$2,883,228.46	\$1,194,642.79	29,081	142
2021	\$1,433,900	\$1,375,378	\$2,764,277.76	\$1,127,916.03	26,835	143
2022	\$1,439,900	\$1,167,873	\$2,601,773.21	\$987,993.25	23,737	143
2023	\$1,466,250	\$1,436,551	\$2,876,450.54	\$1,172,857.14	26,571	149

Appendix B. Other State Fees

The following information from surrounding states regarding their reuse permit fees was provided. Idaho's reuse program is structured differently from our sister states, so a direct comparison is somewhat difficult.

Utah:

For construction permits, Utah's fee is cost-recovery based, using DEQ's approved hourly rate. The burdened labor rate is \$115/hour in FY24 and will be \$125/hour beginning 1 July 2024.

There isn't a separate annual or ongoing fee for reuse as for UPDES, biosolids, etc. permits.

A review of the FY2025 Fee Schedule for Utah did not find a listing for reuse or recycled water permits other than provided above by personal communication.

Oregon:

At this time, the recycled water program for domestic facilities is wrapped into individual NPDES permit or state issued (WPCF) permit fees. These fees are based on the volume of water they treat and the type of treatment system they use. The fee is the same whether the facility provides recycled water or not, provided they make all their changes to their program during the permit renewal. If changes are made after renewal, a \$897 fee is charged for plan review and public notice.

The same fee structure for industrial sources with individual permits is used. However, some industries qualify for a general permits that allow land application of reused water. The restrictions on these permits typically limit qualifying facilities to small to medium sized operations. These permits include the 100J, 1400A, 1400B, and 2501. Application fees for these general permits range from \$366 + \$834 annual fee to \$813 + \$834 annual fee.

Fee schedule is published at <https://www.oregon.gov/deq/wq/Documents/OAR340-045-0075.pdf>.

Montana:

Land application at agronomic rates doesn't require a discharge permit (MPDES or groundwater). The [groundwater permit rules](#) exempt agronomic application of any reclaimed wastewater. The state is also starting to see land application that's not at agronomic rates, like snowmaking with unrestricted reclaimed water (e.g. Yellowstone Club). That is subject to MPDES permitting due to the meltwater inputs to headwaters streams.

With rapid infiltration basins, if the reclaimed water meets the unrestricted classification, it wouldn't be subject to permit requirements. That exemption is in the rule linked above. If it is a lower classification, a groundwater discharge permit would be required. There isn't a lot of unrestricted reclaimed wastewater in Montana, and the ones on the horizon are planning to

apply for groundwater permits regardless of the exclusion. This is probably due to their high profile and value of the “permit as a shield” concept.

Regardless of discharge permit requirements under the Water Quality Act, the wastewater treatment systems and discharge/application systems are subject to Engineering Bureau review under the Public Water Supply Law. Design standards for public wastewater systems are in [DEQ Circular 2](#). Water reclamation and reuse is covered in Appendix B, which includes the acceptable uses for each classification. The classification is the same 6-part scheme from 40 CFR 133. [Permit fees](#) are published in rule.

Washington:

Similar to UT and WY, for recycled water / reuse – there isn’t a separate fee category. In Washington, reclaimed water (defined in statute) must have a domestic component – so the municipal permit fee category captures all those facilities at the same rate, regardless of whether the permit is following regular permit statutes and rules, or those specific to reclaimed water. Washington also is very limited in defining reclaimed/reuse – in that it must be put to beneficial reuse, which then affects water rights. So there are only about 30 actual reclaimed water permits. There are hundreds of permits reusing water to irrigate crops – which are typically just called “land treatment” or state waste discharge permits and their fees are based on the type of facility, i.e. a municipality or a specific industry category. This broader permit universe of ‘reuse’ includes both some municipal (domestic wastewater component) and industrial reuse (typically food processors but also others).

Municipal Wastewater

- As directed by the Legislature in 2022, Ecology worked with a Wastewater Permit Fee Advisory committee to develop a plan for how to equitably account for increased permit costs and address the state’s municipal permit backlog.
- Ecology is proposing to update the permit fee based on the committee’s recommendations, increasing the fee from \$0.18 per residential equivalent per month, which has remained unchanged since 2009, to \$0.29 per month. This equates to an annual rate of \$3.43.
- Ecology is also proposing to establish a minimum fee of \$250 for municipal wastewater permits.
- [Municipal wastewater permit fee focus sheet](#)

Wyoming:

WY does not have fees for the Permits to Construct that we would issue for land application.