EXHIBIT 1
DATE 1/23/09
HB

12/17/08

Projected impacts from a reduction of proposed new Public Water Supply Program FTEs

At the present time, the Department has recruited and filled 8 of the originally authorized 12 modified FTEs for the Public Water Supply Program. To reduce that number to the required 6 FTE, the Department proposes to move 2 of the new hires into other vacant positions. The first of these moves may be possible sometime around the middle of January.

The reduction in the number of FTEs will have a significant effect on the ability of the Department to rectify all of the program implementation issues raised in EPA's 2007 Public Water Supply Program Primacy Report. It will be necessary to focus the remaining staff on mandated duties such as rule implementation, compliance determination, and sanitary surveys (inspections) which are the activities required by state and federal laws. Non-mandated activities such as on-site technical assistance, training, and individual compliance assistance will need to be reduced or eliminated.

EPA has expressed dismay over the loss of some of the additional staff and has serious concerns if the program can be fully and properly implemented with the reduced FTEs. However, EPA recognizes the difficulties created by the current economic situation.

The original plan proposed for the addition of 12 new FTEs had the following goals and objectives:

9 Environmental Specialists
(5 Rule Specialists and 4 Sanitary Survey/Tech Assistance staff)
2 Data Entry
1 Administrative Support

Short Term Tasks (1 to 2 years)

- Eliminate backlog of final determinations needed for systems with potential groundwater under the influence of surface water.
- Eliminate backlog of sanitary surveys and comprehensive performance reviews.
- Bring reviews of systems with filtration avoidance approval up-to-date and make determinations of future applicability of approval.
- Address all systems with no approved sampling plans for carcinogenic compounds created by disinfection chemicals.

- Review the status of all systems with known high levels of carcinogenic compounds created by disinfection chemicals and implement a compliance plan.
- Review all chemical and radiological sampling waivers to determine validity.
- Fully implement and provide review of annual Consumer Confidence Reports produced by community water systems.
- Provide on-site technical assistance to systems with non-compliance violations.
- Provide follow-up inspections on systems that had significant deficiencies on sanitary surveys.

Long Term Tasks (3 to 5 Years)

- Adopt and implement the Long Term II Surface Water Treatment Rule for monitoring, reporting and treating surface water.
- Adopt and implement the Stage II Disinfection – Disinfection By-Product Rule for carcinogenic compounds created by disinfection chemicals.
- Adopt and implement the Groundwater Rule monitoring and disinfection requirements.
- Improve speed and accuracy of data verification and compliance determinations with all rules
- Provide on-site technical assistance and training to systems with operational problems not related to compliance issues.
- Implement a complaint and enforcement follow-up review program to assure that past violations or problems do not reoccur.
- In conjunction with the Department of Public Health and Human Services, develop a Public Water Health Network Notification System for all boil orders and health advisories issued to public water systems and a tracking system for documented illnesses.
- Develop an owner/operator training program for small transient public water supplies (Bars, Restaurants, Motels, etc.).

With a reduction of FTEs from 12 to 6 the proposed goals and objectives will need to be adjusted as follows:

5 Environmental Specialists
(3 Rule Specialists and 2 Sanitary Survey/Tech Assistance staff)
1 Administrative Support

12/17/08

Short Term Tasks (1 to 2 years)

- Eliminate backlog of final determinations needed for systems with potential groundwater under the influence of surface water.
- Bring reviews of systems with filtration avoidance approval up-to-date and make determinations of future applicability of approval.
- Address all systems with no approved sampling plans for carcinogenic compounds created by disinfection chemicals.
- Review the status of all systems with known high levels of carcinogenic compounds created by disinfection chemicals and implement a compliance plan.
- Implement and provide partial review of annual Consumer Confidence Reports produced by community water systems.

Long Term Tasks (3 to 5 Years)

- Eliminate backlog of sanitary surveys and comprehensive performance reviews.
- Adopt and implement the Long Term II Surface Water Treatment Rule for monitoring, reporting and treating surface water.
- Adopt and implement the Stage II Disinfection – Disinfection By-Product Rule for carcinogenic compounds created by disinfection chemicals.
- Adopt and implement the Groundwater Rule monitoring and disinfection requirements.
- Improve speed and accuracy of data verification and compliance determinations with Total Coliform and Surface Water Treatment Rules