



Legislative Fiscal Bureau

One East Main, Suite 301 • Madison, WI 53703 • (608) 266-3847 • Fax: (608) 267-6873

May 10, 2007

Joint Committee on Finance

Paper #596

Environmental Repair Tipping Fee Increase (DNR -- Air, Waste, and Contaminated Land)

Bill Agency

[LFB 2007-09 Budget Summary: Page 429, #5]

CURRENT LAW

Solid and hazardous waste disposal facilities (landfills) pay a tipping fee for each ton of waste, except materials used for lining, daily cover, capping or constructing berms, dikes or roads within the facility. Currently, municipal, hazardous, and non high-volume industrial waste is subject to an environmental repair fee of 50¢ per ton, and high-volume industrial waste is subject to a fee of 20¢ per ton. High-volume industrial waste includes paper mill sludge, bottom ash, foundry process waste and fly ash. In addition, both types of waste are subject to environmental management account tipping fees of 10¢ per ton as a groundwater fee and 4¢ per ton as a well compensation fee. In 2005-06, environmental management account revenue from solid waste tipping fees totaled \$5.7 million. Certain wastes that are used for daily cover at the landfill are exempt from the tipping fees. A recycling tipping fee of \$3 per ton on non high-volume industrial waste is deposited in the segregated recycling fund. A landfill license surcharge of 15¢ per ton on all solid waste, other than exempt tons, is deposited in a DNR program revenue appropriation for landfill and solid waste management administration. A waste facility siting board tipping fee of 0.7¢ per ton on all solid waste, other than exempt tons, is deposited in a program revenue appropriation to support the administrative functions of the Waste Facility Siting Board. Currently, state tipping fees total \$3.797 per ton for waste other than non high-volume industrial waste, and 49.7¢ for high-volume industrial waste.

GOVERNOR

Increase the environmental repair solid waste tipping fee imposed on municipal and non high-volume industrial waste, and deposited in the environmental management account of the environmental fund, by 35¢, from 50¢ to 85¢ per ton, for waste disposed of in Wisconsin landfills on or after July 1, 2007. The administration estimates the fee increase would generate additional revenue to the environmental management account of \$5,390,800 in the biennium, including \$2,310,800 in 2007-08 and \$3,080,000 in 2008-09.

DISCUSSION POINTS

1. Under the bill, the solid waste tipping fees deposited in the environmental management account would total 99¢ per ton for non high-volume industrial waste, and 34¢ per ton for high-volume industrial waste. (See separate budget papers for a discussion of the Governor's proposal to create a 75¢ per ton environmental repair solid waste tipping fee that would be deposited in the nonpoint account of the environmental fund, and the Governor's proposal to increase the recycling tipping fee by \$3 per ton.) When the other proposed tipping fee increases are included, state tipping fees under the bill would increase by \$4.10 per ton for waste other than non high-volume industrial waste as shown in the following table. The fee for high-volume industrial waste would remain at 49.7¢ per ton.

State Solid Waste Tipping Fees

<u>Fee</u>	<u>Fund</u>	<u>Type</u>	<u>Current Law</u>		<u>SB 40</u>	
			<u>High-Volume Industrial Waste</u>	<u>Other Waste</u>	<u>High-Volume Industrial Waste</u>	<u>Other Waste</u>
Recycling	Recycling	SEG	\$0.00	\$3.00	\$0.00	\$6.00
Environmental Repair	Environmental management account	SEG	0.20	0.50	0.20	0.85
Environmental Repair	Nonpoint account	SEG	0.00	0.00	0.00	0.75
Groundwater	Environmental management account	SEG	0.10	0.10	0.10	0.10
Well compensation	Environmental management account	SEG	0.04	0.04	0.04	0.04
Landfill license surcharge	DNR Solid waste administration	PR	0.15	0.15	0.15	0.15
Waste Facility Siting Bd.	DOA Solid Waste Facility Siting Bd.	PR	<u>0.007</u>	<u>0.007</u>	<u>0.007</u>	<u>0.007</u>
			\$0.497	\$3.797	\$0.497	\$7.897

High-volume industrial waste includes fly ash, bottom ash, paper mill sludge and foundry process waste.

Other waste includes municipal solid waste, construction and demolition, industrial that is not high-volume, and commercial.

Waste used as daily cover is exempt from the fees, if use for that purpose is approved by DNR and the waste is used in that way.

2. The administration overestimated the amount of tipping fee revenue to the environmental management account that would be generated by the 35¢ fee increase under the bill by: (a) using all tons subject to the various environmental repair tipping fees (the administration

estimated 8.8 million tons annually) instead of just solid waste tons that are not high-volume industrial waste (8.0 million tons); and (b) estimating there would be nine months of revenue in 2007-08 instead of six months. The environmental repair tipping fee is assessed in May for tons of solid waste disposed of in the previous calendar year. Under the bill, the fee increase would apply to waste disposed of in Wisconsin landfills on or after July 1, 2007. Thus, DNR would first assess landfills for the fee increase in May, 2008, for solid waste disposed of during the six months of July 1, 2007, through December 31, 2007, with fees for 2007-08 due in June of 2008.

3. It is estimated that the 35¢ tipping fee increase would generate \$3,772,100 in revenues to the environmental management account in the 2007-09 biennium (\$1,254,700 in 2007-08 for six months and \$2,517,400 annually beginning in 2008-09). This is \$1.6 million less than the \$5,390,800 estimated by the administration. The current estimate is based on preliminary data showing that, in 2006-07, approximately 7.88 million tons will be assessed the environmental repair tipping fee for non high-volume industrial waste (an additional 1.38 million tons of high-volume industrial waste will be assessed the 20¢ per ton environmental repair tipping fee). It is estimated that, under current law, in 2007-08, approximately 8.08 million tons would be assessed the environmental repair tipping fee for non high-volume industrial waste, and in 2008-09, approximately 8.11 million tons would be subject to the current fee. Further, under the bill, it is expected that the total number of tons of solid waste disposed of in the state would decrease somewhat as tipping fees increase.

4. While it is difficult to determine the actual change in the number of tons that would be subject to the tipping fee, it is anticipated that the total amount of assessed wastes may decrease by approximately 1% from levels anticipated under current law for each \$1 increase in tipping fees. Thus, the number of tons assessed the fee are anticipated to decrease approximately 4% under the bill. This would include a 1% reduction in tons for the \$1.10 tipping fee increase deposited in environmental fund - 35¢ for the environmental management account and 75¢ for the nonpoint account - and 3% for the \$3 tipping fee increase deposited in the recycling fund. Under the bill, in 2007-08, it is anticipated that approximately 7.92 million tons would be assessed the environmental repair tipping fee, and in 2008-09, approximately 7.79 million tons would be assessed the fee. The estimated decrease in tons have been included in the tipping fee revenue estimates described above. If the environmental repair tipping fee increase is approved and if the recycling tipping fee increase is not approved, it is anticipated that the number of tons would reflect a smaller decrease, and revenues to the environmental management account would be somewhat higher than estimated above. Further, it could be expected that substantially larger tipping fee increases may have the effect of greater reductions in disposal of waste subject to the fee (beyond the 1% per dollar used here).

5. Under the bill, revenues to the environmental management account would be expected to be approximately \$200,000 short of authorized commitments during the biennium.

6. The tipping fees are imposed on waste generators. The owner or operator of the landfill is required to collect the fee from the generator or the person that hauls the waste to the landfill, and to pay the required tipping fees to DNR. Landfill operators generally build the cost of

the state assessment into the fees they charge to persons who dispose of waste at the landfill.

7. The current solid waste tipping fees deposited in the account will comprise approximately 23% of the 2006-07 account revenues (excluding site specific revenues primarily related to the Fox River PCB cleanup). It could be argued that increasing the solid waste tipping fee would be an appropriate way of funding current environmental management account expenditures because: (a) the fee is paid, directly or indirectly, by all people in the state and outside of Wisconsin who dispose of waste in Wisconsin; (b) the solid waste tipping fees to the environmental management account were last increased in 1997 when the well compensation tipping fee was increased from 1¢ to 4¢ per ton; (c) some of the contaminated land and brownfields cleanup activities funded from the account relate to cleanup of former landfills or solid waste disposal sites; and (d) the tipping fee, and the vehicle environmental impact fee, may be the only current revenues to the account for which increases may be practical to generate enough revenue to balance the account.

8. Others could argue that fees should not be increased, because the fees would increase costs for businesses, particularly those that generate large quantities of waste, and residents, without providing specific benefits to them. Under this argument, if current revenues are insufficient to fund expenditures from the account, expenditures should be decreased.

9. Some advocates of contaminated land cleanup and brownfields redevelopment projects, such as the Brownfields Study Group, have indicated support for providing adequate revenues to sustain the environmental management account. They also note that raising tipping fees increases the cost of brownfields redevelopment projects, and ultimately affects the viability of those projects.

10. DNR estimates that, of the 7.93 million tons assessed the environmental repair fee for non high-volume industrial waste in calendar year 2005, 1.99 million tons was from Wisconsin residential sources, 2.65 million tons was from industrial, commercial or institutional sources, 1.38 million tons was construction and demolition waste, and 1.91 million tons was from out-of-state sources. DNR estimates that the average Wisconsin household generates approximately one ton of waste per year (2 million tons of Wisconsin residential waste and over 2 million households in Wisconsin). Based on this estimate, the fee increase would be expected to cost each household, on average, approximately 35¢ per year for waste generated by the household.

11. The fee increase in the bill would apply to waste disposed of in Wisconsin landfills on or after July 1, 2007. In discussions of tipping fees in prior years, landfill operators have indicated that it can take time to modify agreements or price contracts with waste haulers and municipalities who dispose of waste at the landfill. Accordingly, the bill could be amended to make the fee increase effective at a later date, for example for waste disposed of on October 1, 2007, or the effective date of the bill, whichever is later.

12. If the Committee chooses to approve the 35¢ tipping fee increase, and changes the effective date to waste disposed of on October 1, 2007, revenue in 2007-08 would be approximately

\$627,300 instead of the \$1,254,700 estimated with a July 1, 2007, effective date. If no other revenues would be provided, the environmental management account would be in deficit by approximately \$825,000 on June 30, 2009.

13. To address this projected deficit, the Committee could choose to reduce expenditure authority by approximately \$825,000 during the biennium. All appropriations in the account could be reduced by 1.83% annually (Alternative 2a) by a total of \$410,900 in 2007-08 and \$412,000 in 2008-09 and 1.45 positions annually. However, three appropriations could not be reduced, including: (a) two sum sufficient DNR appropriations for general obligation bond debt service; and (b) the DNR appropriation for site specific remediation which receives revenues, primarily for remediation of Fox River contaminated sediments, that must be spent for the purposes for which the revenues were received. Further, a UW environmental education appropriation, which receives statutorily-designated revenues of 50% of environmental assessments from violations of DNR environmental rules or orders (approximately \$95,000 annually), could only be reduced by modifying this statutory designation.

14. Alternatively, if the 35¢ tipping fee would be increased on October 1, 2007, expenditure decreases could be made in financial assistance and cleanup appropriations rather than in administrative appropriations. It could be argued that this alternative would maintain state environmental management programs by retaining currently authorized staff to maintain current levels of assistance and regulation related to contaminated land, brownfields, groundwater, and other environmental programs. Under this alternative, DNR and Commerce brownfields grant, state-funded cleanup, and well compensation grant appropriations could be decreased by 3.45% annually, by a total of \$411,400 in 2007-08 and \$411,500 in 2008-09 (Alternative 2b).

15. Administration officials indicate it was the Governor's intent to provide a tipping fee increase sufficient to maintain a positive account balance. If the tipping fee would be increased by 44¢ per ton instead of 35¢, with an effective date for waste disposed of on October 1, 2007, this would provide \$4,020,100 in revenue during the biennium (\$802,000 in 2007-08 and \$3,218,100 in 2008-09), which would be \$875,400 more during the biennium than with a 35¢ fee (Alternative 3). This level of fee increase would be anticipated to be sufficient to balance the account.

16. If the Committee chooses not to approve a tipping fee increase to the environmental management account, and does not provide alternative revenue, expenditure authority would exceed revenues by an estimated \$3,967,600 during the biennium. In order to maintain a positive fund balance, expenditure authority in the environmental management account could be reduced by 8.81% (\$1,981,100 in 2007-08 and \$1,986,500 in 2008-09) from the amounts under the bill and the number of authorized positions could be reduced by the same percentage (6.98 FTE annually). It could be argued that if expenditure authority reductions are made, the reductions should be applied equally to appropriations from the account. (Alternative 4a). Alternatively, in order to maintain state environmental management related activities, the DNR and Commerce brownfields grant, state-funded cleanup, and well compensation grant appropriations could be decreased by 16.62%, for a total of \$1,983,700 annually (Alternative 4b).

17. If the Committee chooses not to continue the \$9 vehicle environmental impact fee (see a separate budget paper), but wants to maintain expenditures from the account at the amounts included in the bill, the Committee could provide an alternative revenue source such as a tipping fee. For example, the solid waste tipping fees deposited in the environmental management account could be increased from the current 64¢ per ton for solid waste that is not high-volume industrial waste disposed of in Wisconsin, by \$2.49 per ton (instead of the 35¢ under the bill). This alternative revenue source would be anticipated to replace the vehicle fee and balance the account. It would generate approximately \$4.65 million in 2007-08 and \$18.67 million annually beginning in 2008-09. (Alternative 5.) This would result in environmental management account tipping fees of \$3.13 per ton for non- high-volume waste (the current 34¢ per ton for high-volume industrial waste would not change). The state tipping fee would total \$10.037 per ton of waste that is not high-volume industrial waste if the proposed \$3 increase in the recycling tipping fee and proposed 75¢ tipping fee to the nonpoint account described in separate budget papers were also adopted.

18. The tipping fee rate for high-volume industrial waste in the environmental management account is currently 34¢ per ton, which is 53% of the current 64¢ per ton rate paid by other waste. High-volume industrial waste includes paper mill sludge, bottom ash, foundry process waste and fly ash, and is generated by paper mills, electric utility plants, and heavy industrial facilities. These industries have argued that tipping fees may put an undue burden on their businesses because they generate large quantities of waste by the nature of their business. However, it could be argued that, if the tipping fee is increased enough to provide an alternative revenue source to the vehicle environmental impact fee, the tipping fee for high-volume industrial waste should be increased so it is the same proportion of the total environmental management account tipping fee. The solid waste tipping fees deposited in the environmental management account could be increased from the current 64¢ per ton for solid waste that is not high-volume industrial waste disposed of in Wisconsin, by \$1.93 per ton (instead of the 35¢ under the bill), and \$1.20 per ton for high-volume industrial waste. This alternative revenue source would be anticipated to replace the vehicle fee and balance the account. It would generate approximately \$4.66 million in 2007-08 and \$18.67 million annually beginning in 2008-09. This would result in environmental management account tipping fees of \$2.92 per ton for other than high-volume waste, and \$1.54 per ton for high-volume industrial waste. (Alternative 6.)

ALTERNATIVES TO BILL

1. Approve the Governor's recommendation to increase the environmental repair solid waste tipping fee to the environmental management account of the environmental fund, by 35¢ per ton for waste that is not high-volume industrial waste, effective for sold waste disposed of in Wisconsin landfills on or after July 1, 2007. Reestimate the revenue increase to \$1,254,700 in 2007-08 (from \$2,310,800) and \$2,517,400 in 2008-09 (from \$3,080,000).

ALT 1	Change to Bill	Change to Base
	Revenue	Revenue
SEG	-\$1,618,700	\$3,772,100

2. Approve the Governor's recommendation, but make the 35¢ increase effective for solid waste disposed of in Wisconsin landfills on or after October 1, 2007, or the effective date of the budget bill, whichever is later. This would provide revenue of \$627,300 in 2007-08 and \$2,517,400 in 2008-09 (\$3,144,700 during the biennium). In addition, approve one of the following methods of making expenditure reductions of \$822,900 during the biennium to reflect the decrease in revenue due to the change in effective date, and to balance the account.

a. Reduce appropriations from the environmental management account by 1.83% annually for a total of \$410,900 SEG in 2007-08 and \$412,000 SEG in 2008-09 and 1.45 positions as shown in Attachment 1.

ALT 2a	Change to Bill			Change to Base		
	Revenue	Funding	Positions	Revenue	Funding	Positions
SEG	-\$2,246,100	-\$822,900	- 1.45	\$3,144,700	-\$822,900	- 1.45

b. Reduce the following grant and cleanup appropriations in the environmental management account by a total of \$411,400 SEG in 2007-08 and \$411,500 SEG in 2008-09 (3.45%): (a) Commerce brownfields grant appropriation by \$241,400 annually; (b) DNR state-funded response cleanup appropriation by \$84,100 in 2007-08 and \$84,200 in 2008-09; (c) DNR well compensation grant appropriation by \$10,100 annually; (d) DNR brownfields site assessment grants appropriation by \$58,600 annually; and (e) DNR brownfields green space grants appropriation by \$17,200 annually.

ALT 2b	Change to Bill		Change to Base	
	Revenue	Funding	Revenue	Funding
SEG	-\$2,246,100	-\$822,900	\$3,144,700	-\$822,900

3. Approve an increase of 44¢ per ton in the environmental repair solid waste tipping fee that is deposited in the environmental management account of the environmental fund (from 50¢ to 99¢). Provide that the fee increase would be effective for sold waste disposed of in Wisconsin landfills on or after October 1, 2007, or the effective date of the budget bill, whichever is later. This would be expected to provide revenue of \$802,000 in 2007-08 and \$3,218,100 in 2008-09 (\$4,020,100 during the biennium). This alternative would be anticipated to balance the account.

ALT 3	Change to Bill	Change to Base
	Revenue	Revenue
SEG	-\$1,370,700	\$4,020,100

4. Delete the Governor's recommendation to increase the environmental repair tipping

fee deposited in the environmental management account. In addition, approve one of the following methods of making expenditure reductions of \$3,967,600 during the biennium to reflect the decrease in revenue, and to balance the account.

a. Reduce appropriations from the environmental management account by 8.81% annually for a total of \$1,981,100 SEG in 2007-08 and \$1,986,500 SEG in 2008-09 and 6.98 positions as shown in Attachment 2.

ALT 4a	Change to Bill			Change to Base		
	Revenue	Funding	Positions	Revenue	Funding	Positions
SEG	-\$5,390,800	-\$3,967,600	- 6.98	\$0	-\$3,967,600	- 6.98

b. Reduce the following grant and cleanup appropriations in the environmental management account by a total of \$1,983,700 SEG annually (16.62%): (a) Commerce brownfields grant appropriation by \$1,163,400 annually; (b) DNR state-funded response cleanup appropriation by \$405,900 annually; (c) DNR well compensation grant appropriation by \$48,900 annually; (d) DNR brownfields site assessment grants appropriation by \$282,500 annually; and (e) DNR brownfields green space grants appropriation by \$83,100 annually.

ALT 4b	Change to Bill		Change to Base	
	Revenue	Funding	Revenue	Funding
SEG	-\$5,390,800	-\$3,967,600	\$0	-\$3,967,600

5. Increase the environmental repair solid waste tipping fee deposited in the environmental management account by \$2.49 per ton on all solid waste, other than high-volume industrial waste, disposed of in Wisconsin, effective for waste disposed of on or after October 1, 2007, or the effective date of the bill, whichever is later. This would generate tipping fee revenues of approximately \$4,653,000 in 2007-08 and \$18,671,000 in 2008-09 and balance the account.

ALT 5	Change to Bill	Change to Base
	Revenue	Revenue
SEG	\$17,933,200	\$23,324,000

6. Increase the environmental repair solid waste tipping fee deposited in the environmental management account by \$1.93 per ton on all solid waste, other than high-volume industrial waste, and \$1.20 per ton on high-volume industrial waste, disposed of in Wisconsin, effective for waste disposed of on or after October 1, 2007, or the effective date of the bill, whichever is later. This would generate tipping fee revenues of approximately \$4,660,000 in 2007-08 and \$18,670,000 in 2008-09 and balance the account.

ALT 6	Change to Bill Revenue	Change to Base Revenue
SEG	\$17,939,200	\$23,330,000

Prepared by: Kendra Bonderud
Attachment

ATTACHMENT 1

Alternative 2a (1.83% Reduction)

Funding

Appropriation	Bill		Reduction in Funding		Alt 2A Funding	
	2007-08	2008-09	2007-08	2008-09	2007-08	2008-09
Commerce brownfields grants	\$7,000,000	\$7,000,000	-\$128,000	-\$128,000	\$6,872,000	\$6,872,000
DNR Air and Waste Division operations	3,198,000	3,205,900	-58,500	-58,600	3,139,500	3,147,300
DNR Air and Waste Division brownfields operations	367,500	367,800	-6,700	-6,700	360,800	361,100
DNR Enforcement and Science Division operations	1,189,800	1,200,000	-21,700	-21,900	1,168,100	1,178,100
DNR Water Division operations	3,519,400	3,536,000	-64,300	-64,600	3,455,100	3,471,400
DNR groundwater management	91,900	91,900	-1,700	-1,700	90,200	90,200
DNR Administration and Technology operations	1,065,100	1,090,000	-19,500	-19,900	1,045,600	1,070,100
DNR Customer Assistance and External Relations operations	796,600	798,200	-14,600	-14,600	782,000	783,600
DNR state-funded response cleanup	2,440,800	2,442,900	-44,600	-44,700	2,396,200	2,398,200
DNR well compensation grants	294,000	294,000	-5,400	-5,400	288,600	288,600
DNR brownfields site assessment grants	1,700,000	1,700,000	-31,100	-31,100	1,668,900	1,668,900
DNR brownfields green space grants	500,000	500,000	-9,100	-9,100	490,900	490,900
DHFS groundwater and air quality standards	306,000	306,000	-5,600	-5,600	300,400	300,400
DMA emergency response training	7,700	7,700	-100	-100	7,600	7,600
Total	\$22,476,800	\$22,540,400	-\$410,900	-\$412,000	\$22,065,900	\$22,128,400

Annual Staff

Appropriation	Bill	Reduction in Alt 2a	Alt 2a Staff
DNR Air and Waste Division operations	32.25	-0.59	31.66
DNR Air and Waste Division brownfields operations	3.00	-0.05	2.95
DNR Enforcement and Science Division operations	8.08	-0.15	7.93
DNR Water Division operations	29.67	-0.54	29.13
DNR Customer Assistance and External Relations operations	4.21	-0.08	4.13
DHFS groundwater and air quality standards	2.00	-0.04	1.96
Total	79.21	-1.45	77.76

ATTACHMENT 2

Alternative 4a (8.81% Reduction)

Funding

<u>Appropriation</u>	<u>Bill</u>	<u>2007-08</u>	<u>2008-09</u>	<u>Reduction in Funding</u>	<u>2007-08</u>	<u>2008-09</u>	<u>Alt 4A Funding</u>
Commerce brownfields grants		\$7,000,000	\$7,000,000	-\$616,900	-\$616,900	-\$616,900	\$6,383,100
DNR Air and Waste Division operations		3,198,000	3,205,900	-281,800	-282,500	-282,500	2,916,200
DNR Air and Waste Division brownfields operations		367,500	367,800	-32,400	-32,400	-32,400	335,100
DNR Enforcement and Science Division operations		1,189,800	1,200,000	-104,900	-105,800	-105,800	1,084,900
DNR Water Division operations		3,519,400	3,536,000	-310,200	-311,600	-311,600	3,209,200
DNR groundwater management		91,900	91,900	-8,100	-8,100	-8,100	83,800
DNR Administration and Technology operations		1,065,100	1,090,000	-93,900	-96,100	-96,100	971,200
DNR Customer Assistance and External Relations operations		796,600	798,200	-70,200	-70,300	-70,300	726,400
DNR state-funded response cleanup		2,440,800	2,442,900	-215,200	-215,300	-215,300	2,225,600
DNR well compensation grants		294,000	294,000	-25,900	-25,900	-25,900	268,100
DNR brownfields site assessment grants		1,700,000	1,700,000	-149,800	-149,800	-149,800	1,550,200
DNR brownfields green space grants		500,000	500,000	-44,100	-44,100	-44,100	455,900
DHFS groundwater and air quality standards		306,000	306,000	-27,000	-27,000	-27,000	279,000
DMA emergency response training		7,700	7,700	-700	-700	-700	7,000
Total		\$22,476,800	\$22,540,400	-\$1,981,100	-\$1,986,500	-\$1,986,500	\$20,495,700

Annual Staff

<u>Appropriation</u>	<u>Bill</u>	<u>Reduction in Alt 4a</u>	<u>Alt 4a Staff</u>
DNR Air and Waste Division operations	32.25	-2.84	29.41
DNR Air and Waste Division brownfields operations	3.00	-0.26	2.74
DNR Enforcement and Science Division operations	8.08	-0.71	7.37
DNR Water Division operations	29.67	-2.62	27.05
DNR Customer Assistance and External Relations operations	4.21	-0.37	3.84
DHFS groundwater and air quality standards	<u>2.00</u>	<u>-0.18</u>	<u>1.82</u>
Total	79.21	-6.98	72.23