



**STATE OF WASHINGTON**  
**OFFICE OF THE STATE HUMAN RESOURCES DIRECTOR**

DIRECTOR'S REVIEW PROGRAM  
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January 17, 2013

TO: Greg Davis, Council Representative  
Washington Federation of State Employees (WFSE)

FROM: Teresa Parsons, SPHR  
Director's Review Program Supervisor

SUBJECT: Patrick Hallinan v. Department of Ecology (ECY)  
Allocation Review Request ALLO-12-009

On October 11, 2012, I conducted a Director's review telephone conference regarding the allocation of Patrick Hallinan's position. In addition to you and Mr. Hallinan, his co-worker and Shop Steward, Scott Mallery, also participated in the conference. Wendy Holton, Senior Human Resources Consultant, represented the Department of Ecology (ECY). Also present from ECY were Kelly Susewind, Water Quality Program Manager; James Bellatty, Section Manager for the Eastern Region; and Mr. Hallinan's current supervisor of the Permit Management Unit, Diana Washington, Environmental Engineer 5.

**Director's Determination**

This position review was based on the work performed for the six-month period prior to March 4, 2011, the date ECY's Office of Human Resources (HR) received Mr. Hallinan's request for a position review. As the Director's designee, I carefully considered all of the documentation in the file, the exhibits presented during the Director's review conference, and the verbal comments provided by both parties. Based on my review and analysis of Mr. Hallinan's assigned duties and responsibilities, I conclude his position is properly allocated to the Environmental Engineer 3 (EE 3) classification.

**Background**

Mr. Hallinan is assigned to the Water Quality Program and works in the Eastern Region's Permit Management Unit with the working titles of Permit Manager, Facility Manager, and Industrial Facility Manager and Engineer. Mr. Hallinan's position reports to the Permit Management Unit Supervisor (EE 5) who reports to the Eastern Region Section Manager (Washington Management Service (WMS) Band 2) (Exhibit B-1). On March 4, 2011, Mr. Hallinan submitted

a Position Review Request (PRR) to the HR Office asking that his Environmental Engineer 3 (EE 3) position (#2409) be reallocated to the Environmental Engineer 5 (EE 5) classification. Mr. Hallinan's supervisor at the time, EE 5 Virginia Darrell, and Water Quality Program Manager Kelly Susewind both signed the PRR, agreeing that the information on the PRR was accurate and complete (Exhibit B-8).

As part of her review, Senior HR Consultant Wendy Holton contacted Mr. Hallinan's current supervisor, EE 5 Diana Washington, Section Manager James Bellatty, and Program Manager Kelly Susewind. On January 7, 2012, Ms. Holton determined the EE 3 job class was the best fit for Mr. Hallinan's assigned duties and responsibilities. Specifically, Ms. Holton concluded Mr. Hallinan's position did not have responsibility for directing an environmental or public health section; did not provide mentoring, training, or engineering lead and consulting expertise on a section wide basis; had not been assigned the most complex projects; and that his position had not been recognized and designated in writing as the section's authority in an environmental engineering technical specialty area (Exhibit B-3).

On February 3, 2012, the Office of the State Human Resources Director (OSHRD) received Mr. Hallinan's request for a Director's review of ECY's allocation determination (Exhibits A-1 and 2).

### **Summary of Mr. Hallinan's Perspective**

Mr. Hallinan asserts he independently performs senior-level professional environmental engineering duties with a focus on high profile and complex industrial National Pollutant Discharge Elimination System (NPDES) and State Waste Discharge (SWD) permits. Mr. Hallinan contends he is the lead contact in the Eastern region for NPDES permits for industrial discharges, development of water quality based permit limits, and water quality dilution zone modeling. As such, Mr. Hallinan contends his position has been assigned the responsibility to manage industrial permits for the largest projects with the most complex features, which require additional studies and reports not required by other facilities. Mr. Hallinan indicates the complexity of large projects includes difficult coordination of issues affecting multiple regions and federal agencies, as well as possible conflicting design requirements or unsuitability of conventional materials or methods. Mr. Hallinan further states that he plans and conducts investigations and proposes solutions for problems requiring research and application of environmental engineering techniques in specialty fields.

Mr. Hallinan describes specialty areas that include industrial wastewater treatment, remediation of ground water contamination, pollution source control and reduction, and treatment for metals, mining, and milling. In addition, Mr. Hallinan asserts he is the sole contact and section expert regarding metals, mining, and milling for the Eastern Region, and he emphasizes that multiple, complex environmental requirements exist as a result of the Metals, Milling, and Mining Act, which he is required to understand and apply. Mr. Hallinan further asserts he routinely provides mentoring, training, and engineering lead and consulting expertise to others regarding the issuance of NPDES and SWD permits in the Water Quality Program, as well as other programs in the agency. Mr. Hallinan asserts the EE 3 level job class does not encompass the senior level responsibilities assigned to his position. Instead, he contends that he performs senior level environmental engineering duties as described by the EE 5 class specification.

### **Summary of ECY's Reasoning**

ECY recognizes Mr. Hallinan as a registered professional engineer and acknowledges he works on complex sites. However, ECY asserts that positions starting at the EE 3 level require registration as a professional engineer. In addition, ECY emphasizes that environmental engineering skills required at this level are not rudimentary. Rather, ECY contends positions allocated to the EE 3 level require a high level of engineering expertise and are expected to work with complex environmental engineering issues. Therefore, ECY agrees Mr. Hallinan performs duties involving specialized engineering for industrial facilities but contends that level of work is encompassed in the EE 3 job class.

During the Director's review conference, Mr. Susewind explained how ECY designates environmental engineering positions to the EE 5 level. He first reiterated that positions at the EE 3 level are expected to work on complex environmental engineering projects in a multitude of specialty areas and are expected to be professional experts representing the agency. He then indicated that when a program has a need for an even higher level of expertise or a specialized need with unique demands, such as a small community municipal wastewater system, management will designate an environmental engineer position to the EE 5 level. Because Mr. Hallinan's position has not been designated in writing as a senior environmental engineering specialist, ECY contends his position does not fit the definition of the EE 5 job class.

In addition, while ECY recognizes Mr. Hallinan provides engineering expertise regarding metals, mining, and milling, his managers assert he also permits facilities that do not involve metals, mining, and milling wastewater treatment. Therefore, ECY asserts his position does not perform permitting for those particular specialty areas the majority of the time. Further, ECY contends that serving as a contact person regarding the Metals, Milling, and Mining Act does not mean designation as a senior environmental engineering specialist. Overall, ECY contends the duties and responsibilities assigned to Mr. Hallinan's position appropriately fit within the EE 3 job class.

### **Rationale for Director's Determination**

The purpose of a position review is to determine which classification best describes the overall duties and responsibilities of a position. A position review is neither a measurement of the volume of work performed, nor an evaluation of the expertise with which that work is performed. A position review is a comparison of the duties and responsibilities of a particular position to the available classification specifications. This review results in a determination of the class that best describes the overall duties and responsibilities of the position. Liddle-Stamper v. Washington State University, PAB Case No. 3722-A2 (1994).

### **Duties and Responsibilities**

In summary, Mr. Hallinan's position performs independent professional engineering reviews of technical documents and makes recommendations with an emphasis on technology appropriate for treating industrial wastewater discharge. He writes, issues, and manages National Pollutant Discharge Elimination System (NPDES) major permits for three industrial facilities in the Eastern Region discharging to surface water (Spokane River). He also manages state permits relating to industrial wastewater discharge affecting ground water quality. In addition, Mr. Hallinan evaluates the adequacy of assigned permit applications and conducts pre-permit and

compliance evaluation inspections. Mr. Hallinan also serves as the section's contact person for metals, mining, and milling operations regulated under the Metals Mining and Minerals Act.

The Water Quality Program issues eight NPDES permits in total, and Mr. Hallinan has responsibility for managing three of those eight permits. In addition, he manages other state permits as well (Exhibits A-4 (booklet) S and T). During the Director's review conference, Mr. Hallinan and his supervisor and managers explained that permits are issued on a five-year cycle but continual monitoring occurs to manage wastewater discharge by facilities.

On the Position Review Request (PRR), Mr. Hallinan describes his position's purpose as follows:

In the Permit Management Unit of the Eastern Regional Office Water Quality Section, serves as senior level Environmental Engineer (Permit Manager). Represents the Department as a registered professional engineer, and serves as a senior level Permit Manager for assigned Industrial Facilities. Performs independent professional environmental engineering duties for the Water Quality Program, and is responsible for providing expert technical engineering review and recommendations for the approval of final engineering designs and permitting functions regarding Industrial Process Facilities. Assesses facilities to determine compliance with regulatory and permit requirements. Implements all aspects of the wastewater discharge permit program in the regional office.

The main job duties described on the PRR are broken down as follows:

- 35% Performs independent professional engineering review of technical documents, with particular emphasis on the technology appropriate for treating waste water discharging to surface water (NPDES permits) and ground water (state permits) quality. These duties involve the review of engineering reports, construction plans and specifications, AKART evaluations including pollution prevention plans, Operations and Maintenance Manuals, for industrial wastewater facilities in order to eliminate, prevent and control pollutant discharge to waters of the State.
- 30% Independently evaluates the adequacy of assigned National Pollutant Discharge Elimination System (NPDES) and State waste discharge permit applications. Reviews applications for completeness, collects background information, conducts per-permit inspections, negotiates permit conditions with applicants, drafts and finalizes permits and fact sheets, prepares public notices and conducts public participation activities including public hearings as necessary. Prepares and/or reviews SEPA [State Environmental Policy Act] documents for these facilities as needed.
- 20% Independently conducts compliance evaluation inspections as necessary, including sampling inspections, but at least once per permit cycle on all assigned NPDES and State permitted facilities. Conducts and assists on annual NPDES Major facility inspections, including Class II inspections, and quarterly inspections of facilities under the Metals Mining and Minerals Act. Writes inspection reports and communicates findings to facilities. Negotiates facility improvements based on findings.

- 10% Reviews all discharge monitoring reports and other reports submitted as required from facilities. Investigates permit limit discharge excursions, other permit violations, and compliance to the facility file, communicates these to the facilities, initiates corrective actions, and makes recommendations on need for enforcement actions. Negotiates compliance schedule to correct recurring non-compliance.
- 5% Assists in Water Quality Program planning and evaluation of the effectiveness of the permit program, and annual permit and inspection schedule plans. Provides professional engineering support on other work as needed.

The Position Description Form (PDF) for Mr. Hallinan's position, dated January 8, 2007, and signed by his previous supervisor, Len Bramble, provides a similar description of work. For example, the position objective describes his position, in part, as follows (Exhibits B-6, B-12, and B-17):

. . . a senior level Permit Manager for assigned industrial facilities, including some of the more difficult and challenging permits in the region. Provides NPDES permitting guidance to other regions or programs within the agency. Serves as the section's contact for metals, mining, and milling operations. Performs independent professional environmental engineering duties for the Water Quality Program, and is responsible for providing expert technical engineering review, recommendations, and approval of final engineering designs and permitting functions regarding industrial process facilities.

The breakdown of duties on the PDF is also similar to the PRR with Mr. Hallinan's assigned duties focusing on performing independent professional engineering review of technical documents (30%); independently evaluating the adequacy of assigned NPDES and State waste discharge permit applications (30%); conducting compliance evaluation inspections as necessary (15%); reviewing all discharge monitoring reports required from facilities and investigating permit limit discharge excursions, other permit violations, and complaints related to facilities (15%); and assisting in Water Quality Program planning and evaluation of permit program effectiveness (5%).

### Class Specifications

When comparing the assignment of work and level of responsibility to the available class specifications, the class series concept (if one exists) followed by definition and distinguishing characteristics are primary considerations. While examples of typical work identified in a class specification do not form the basis for an allocation, they lend support to the work envisioned within a classification.

The Environmental Engineer class series concept states, in part, that in order for a position to be allocated to this series, "it must first meet the definition for professional engineering." In summary, the different levels within the series are distinguished as follows (Exhibit C-3):

*Environmental Engineer 1* - assist and perform routine environmental engineering activities under close or general supervision.

*Environmental Engineer 2* - perform the full range of environmental engineering activities within the assigned program.

*Beginning with the Environmental Engineer 3 level, incumbents represent the department as registered Professional Engineers.* Additionally, incumbents perform the following:

*Environmental Engineer 3* - review and perform environmental engineering activities that require registration as a Professional Engineer.

*Environmental Engineer 4* - supervise a medium-sized environmental unit.

*Environmental Engineer 5* - supervise an environmental section or large environmental unit performing environmental engineering duties or section's authority in a specialty field.

*Environmental Engineer 6* - supervise a medium-sized environmental section performing environmental engineering duties or program expert in a specialty field.

Mr. Hallinan's position fits the Environmental Engineer class series concept. Further, he represents the department as a registered Professional Engineer. Mr. Hallinan's position has not been assigned supervisory responsibility, which is required at the EE 4 level. Therefore, I focused my review on the EE 3 and EE 5 job classes.

The **Environmental Engineer 5 (EE 5)** definition states, in relevant part, the following:

As a senior environmental engineering specialist, plans, and conducts investigations of, and proposes solutions to environmental engineering problems that require the research and application of environmental engineering techniques and principles within a specialty field. Positions are recognized and designated in writing by a program manager . . . as a section's authority in an environmental engineering technical specialty, type of facility, or equipment. Position represents the department as a registered Professional Engineer.

The EE 5 distinguishing characteristics:

1. Provides mentoring, training, engineering lead and consulting expertise on a section-wide basis, and
2. Applies conventional engineering techniques and principles to the section's most complex projects or largest projects with complex features, such as conflicting design requirements, unsuitability of conventional materials, or difficult coordination problems, and
3. Represents the section as an authority in an environmental engineering technical specialty, type of facility or equipment, and
4. Consults with/advises section supervisors on issues related to specialty field.

During the Director's review conference, much of the discussion centered on whether Mr. Hallinan's position serves as the section's authority in an environmental engineering technical specialty field. It is undisputed Mr. Hallinan serves as a senior level Environmental Engineer and represents the department as a registered professional engineer, which is affirmed in both the PRR and PDF. In addition, Mr. Bellatty has affirmed that Mr. Hallinan is considered "the engineering lead for industrial and mining facilities in the region" (Exhibit A-4 (booklet) A-6).

However, during the Director's review conference, Mr. Susewind noted there are an infinite number of specialty areas in the engineering field. To be allocated to the EE 5 level as a designated senior specialist, ECY uses a specific form. Mr. Hallinan provided an unsigned example of the form ECY uses, which was drafted for his position (Exhibit B-10). He also indicated that his former supervisors supported reallocation to the EE 5 class. However, Mr. Susewind, as the Water Quality Program Manager, retains the authority to designate positions as senior specialist to the EE 5 class. Mr. Susewind expressly stated that he had not designated Mr. Hallinan's position as a senior specialist at the EE 5 level.

When considering the written designation requirement, I reviewed past decisions from the Personnel Appeals Board (PAB) and Personnel Resources Board (PRB). In Rapoza v. Washington State Parks and Recreation Commission, PRB Case No. R-ALLO-08-021 (2009), the PRB addressed written designation to the same level environmental engineer classification (formerly the EE 4 and currently the EE 5 class) as follows:

The issue of written designation has been addressed in many decisions by the Personnel Appeals Board (predecessor to this Board.) The Personnel Appeals Board consistently held that when a classification specification requires written designation, there must be a document that confers such a designation upon the position in question. This written documentation can be a formal agency designation form, an approved CQ [or Position Description form] or other written documentation. [See for example, Griffith v. Dep't of Ecology, PAB Case No. ALLO-00-0016 (2000) and Stash v. Dep't of Ecology, PAB Case No. ALLO-00-0001 (1999)].

In this case, Appellant claims that he functions as an authority and technical expert. However, Appellant does not have a document from management that specifically designates him as such. Appellant is not designated in writing as an authority in an environmental engineering technical specialty, type of facility or equipment. Therefore, consistent with the long standing precedent requiring written designation, Appellant does not meet the third option of the EE 4 classification.

Although there are aspects of Mr. Hallinan's environmental engineering duties and responsibilities that align with the EE 5 job class, his assignment of work does not fully meet the EE 5 definition. Mr. Hallinan's position has been described as a senior level engineer, and he applies conventional engineering techniques and principles to large, complex projects. In addition, his supervisor indicated that he continues to perform some mentoring to other engineers, and he is considered the engineering lead for industrial and mining facilities in the Eastern Region, as well as a resource for metals, mining, and milling.

However, Mr. Hallinan's position lacks the written designation required by the EE 5 definition. Mr. Susewind indicated that ECY management had not determined a program need for added, specialized duties warranting designation as a section's authority in an environmental engineering technical specialty area for the time relevant to this review. Additionally, the duties and responsibilities assigned to his position do not meet the other portions of the EE 5 definition. For these reasons, allocation to the EE 5 classification is not appropriate.

The **Environmental Engineer 3 (EE 3)** definition states the following:

As a registered Professional Engineer, performs professional environmental engineering duties in an assigned program involving the protection of public health and/or the protection or restoration of the environment. May supervise or lead assigned engineers and/or other staff.

The EE 3 distinguishing characteristics indicate that incumbents “represent the agency as a registered Professional Engineer and provide/approve final engineering designs and decisions.”

Mr. Hallinan's duties are encompassed in the EE 3 class specification. He independently performs professional environmental engineering duties involving reviews of technical documents; writing and negotiating permit conditions and managing permits for industrial wastewater discharge, including NPDES and SWD permits; conducting compliance evaluation inspections; and ensuring compliance with federal and state environmental laws.

The EE 3 typical work examples that align with Mr. Hallinan's assigned duties and responsibilities include the following:

- Serves as a registered Professional Engineer responsible for performing independent environmental engineering duties for a specific environmental program; duties . . . final review and/or approval of detailed engineering plans and specifications, site plans, engineering reports and/or operation and maintenance of environmental systems . . .
- Serves as an agency environmental engineering expert responsible for the review of engineering reports and detailed plans and specifications for projects involving federal and state grant funds; may provide technical oversight, assistance and/or training to other governmental entities;
- Independently plans and/or conducts specialized comprehensive engineering inspections and/or studies of municipal and industrial environmental treatment facilities to ensure compliance with applicable laws, regulations and design/performance requirements;
- Provides professional engineering expertise to the review and evaluation of proposal or existing environmental permits and permit applications; negotiates and prepares permits; makes final recommendations on enforcement actions;
- Provides professional technical engineering assistance to agency staff and management . . .
- Interprets regulations, policies, technical engineering guidelines, and procedures covering design requirements, engineering review, and operation and maintenance requirements for environmental control or management facilities;
- Researches, writes, and provides technical direction in the development/revision and implementation of engineering standards, regulations, and guidelines for specific environmental program(s) and related engineering issues;

- Prepares, reviews, and negotiates with applicable parties for environmental permits, regulatory orders and environmental plans and monitoring programs for assigned program(s).

Overall, the duties and responsibilities assigned to Mr. Hallinan's position are encompassed in the EE 3 class specification. Lacking written designation by the Water Quality Program Manager as a senior specialist recognized as a section's authority in a specialty field, the EE 3 classification is the best fit for Mr. Hallinan's position.

### **Appeal Rights**

RCW 41.06.170 governs the right to appeal. RCW 41.06.170(4) provides, in relevant part, the following:

An employee incumbent in a position at the time of its allocation or reallocation, or the agency utilizing the position, may appeal the allocation or reallocation to . . . the Washington personnel resources board . . . . Notice of such appeal must be filed in writing within thirty days of the action from which appeal is taken.

The mailing address for the Personnel Resources Board (PRB) is P.O. Box 40911, Olympia, Washington, 98504-0911. The PRB Office is located on the 4<sup>th</sup> floor of the Insurance Building, 302 Sid Snyder Avenue SW, Olympia, Washington. The main telephone number is (360) 902-9820, and the fax number is (360) 586-4694.

If no further action is taken, the Director's determination becomes final.

c: Pat Hallinan  
Wendy Holton, ECY  
Lisa Skriletz, OSHRD

Enclosure: List of Exhibits

**PAT HALLINAN v. ECY**  
**ALLO-12-009**

**A. Pat Hallinan Exhibits**

1. Letter requesting Director's review received February 3, 2012
2. Director's Review Form (3 pages)
3. January 7, 2012 ECY allocation determination letter (4 pages)
4. Exhibit booklet (exhibits A – DD, list attached)

**B. ECY Exhibits**

1. Water Quality Program organizational chart
2. January 7, 2012 email to Pat Hallinan forwarding ECY position review determination and attachments
3. January 7, 2012 ECY position review determination (4 pages)
4. Environmental Engineer 3 class specification 536G
5. Environmental Engineer 5 class specification 536I
6. January 2007 Position Description Form (8 pages)
7. Pat Hallinan's letter and exhibit list for position review request to ECY HR March 2011 (2 pages)
8. Position Review Request form (6 pages)
9. ERO WQ Section organizational structure (3 pages)
10. Designated Senior Specialist form (3 pages)
11. Proposed ERO WQ EE5 reallocation (2 pages)
12. Industrial Facility Manager & Engineer Position Description (8 pages) Mr. Hallinan's PDF (same as B-6 and B-17)
13. Industrial Facility Manager & Engineer Essential Functions Analysis (8 pages)
14. 2009 Performance & Development Plan (6 pages)
15. 2010 Performance & Development Plan (6 pages)
16. July 25, 2012 letter from Wendy Holton submitting additional exhibit (2 pages)
17. January 2007 Position Description Form (8 pages) (same as B6 and B-12)

**C. Class Specifications**

1. Environmental Engineer 3 class specification 536G
2. Environmental Engineer 5 class specification 536I
3. Class Series Concept (Environmental Engineer 1 class specification 536E)

<b>Exhibit Booklet No.</b>	<b>File Name</b>	<b>Description</b>	<b>Pages</b>
A	Agency emails.pdf	Internal agency emails regarding reallocation requests of Pat Hallinan, Scott Mallery and Pat McGuire	17
B	Chapter 78.56 RCW.pdf	Chapter 78.56 RCW, Metals Mining and Milling Operations	10
C	Hallinan Final 2010-2012.pdf	Pat Hallinan 2010 to 2012 PDP Form (select areas highlighted) & current Essential Function Analysis and Position Description	23
D	Hallinan PDP draft 2010.pdf	Pat Hallinan 2009 to 2010 PDP Form (select areas highlighted)	6
E	Hallinan PDP draft_2008-2009.pdf	Pat Hallinan 2008 to 2009 PDP Form (select areas highlighted)	6
F	Buckhorn Project emails.pdf	Pat Hallinan list of emails on the Buckhorn Mountain Mine Project	17
G	Buckhorn Directory.pdf	Computer directory of files on Pat Hallinan hard drive for the Buckhorn Mountain Mine Project	1
H	Teck Files.pdf	List of Teck Cominco files at Eastern Regional Office, Central Files (select files highlighted)	5
I	Kinross Files.pdf	List of Kinross Gold files at Eastern Regional Office, Central Files (select files highlighted)	5
J	IEPCo emails.pdf	Pat Hallinan list of emails regarding Inland Empire Paper Company	17
K	Kaiser emails.pdf	Pat Hallinan list of emails regarding Kaiser Aluminum, Trentwood	20
L	Kaiser Files.pdf	List of Kaiser Aluminum files at Eastern Regional Office, Central Files (select files highlighted)	5
M	NW Alloys emails.pdf	Pat Hallinan list of emails regarding Industrial Section's NW Alloys plant, Addy	1
N	Lehigh Directory.pdf	Computer directory of files on Pat Hallinan hard drive for Lehigh TCP Cleanup site, Metaline Falls	1
O	CORMIX Directory.pdf	Computer directory of files on Pat Hallinan hard drive for CORMIX mixing zone model (select files highlighted)	2
P	RP Directory.pdf	Computer directory of files on Pat Hallinan hard drive for reasonable potential determinations (select files highlighted)	2
Q	Reasonable Potential (11-10)m.pdf	Reasonable Potential Spreadsheet	12

<b>Exhibit Booklet No.</b>	<b>File Name</b>	<b>Description</b>	<b>Pages</b>
R	ERO WQ Permit Unit Sharepoint.pdf	ERO Water Quality Permit Unit Sharepoint Site	1
S	Pat H Permit List.pdf	List of assigned permits, Pat Hallinan	1
T	Major List.pdf	List of NPDES Major Permits issued by the Water Quality Program (select permits highlighted)	1
U	Public Hearing List.pdf	List of permits with a public hearing issued by the Water Quality Program (select permits highlighted)	1
V	BuckhornResponsiveSummary11-2006[1].pdf	Response to comments on Buckhorn Mountain Mine NPDES permit	83
W	Response to Teck Cominco Permit Comments.pdf	Response to Comments, Teck Cominco, Inc.	81
X	Kaiser_Response_to_Permit_Comments_-_June_2011[1].pdf	Response to Comments, Kaiser Aluminum	83
Y	IEPCo_Response_to_Permit_Comments_9-11_App_D1[1].pdf	Response to Comments, 1 <sup>st</sup> Draft permit for Inland Empire Paper Company	106
Z	IEPCo_Response_to_Amended_Permit_Comments_9-11_App_D2[1].pdf	Response to Comments, 2 <sup>nd</sup> Draft permit for Inland Empire Paper Company	16
AA	NWRO Org Chart.pdf	NWRO Water Quality org chart (select positions highlighted)	1
BB	SWRO Org Chart.pdf	SWRO Water Quality org chart (select positions highlighted)	1
CC	Position Description Jacek Anuszewski.pdf	Position Description form for Jacek Anuszewski	6
DD	EE5 Designated Senior Specialist Jeanne Tran.pdf	Environmental Engineering Designated Senior Specialist Form for Jeanne Tran	2