

Plastics Recycled Content (PCR) Workload Analysis Fiscal Year (FY) 2023

Background

RCW 70A.245.020 (3) requires the Department of Ecology to prepare an annual Workload Analysis (WLA) for public comment that identifies the annual costs it expects to incur to implement, administer, and enforce the post-consumer recycled content requirements, in the next fiscal year for each category of covered products, beginning January 31, 2022, and annually thereafter.

This WLA provides Ecology's estimated annual costs for FY 2023. Ecology will invoice producers to cover these costs. Please note, we show how we will calculate the fees per producer, but we can only provide an example at this time. Producers' fees will be based on plastic resin content in Washington State and the number of producers. We will not have this data until producers register by April 1, 2022. In future years, we will use prior year registration and reporting to estimate fees, based on the methods set in rulemaking.

Table 1: FY 2023 Estimated Costs by Category

Cost Category	Estimated Cost
Salaries	\$312,507
Benefits	\$114,065
Goods and Services	\$20,303
Travel	\$9,383
Equipment	\$5,166
Facility costs, rulemaking meetings	\$2,000
Assistant Attorney General	\$19,000
Agency Administrative Overhead	\$120,720
Total Costs	\$603,144

Table 2: Estimated Workload in Full-Time Equivalents (FTEs) by Position

Position	Job Classification	Standard Salary (for 1.0 FTE)	FY 2023 FTE
Plastic Packaging Subject Lead	Environmental Planner 4	\$86,484	0.50
Rulemaking Coordinator	Environmental Planner 5	\$95,484	0.10
Rule Economic Analyst	Economic Analyst 3	\$82,344	0.17
Rule Regulatory Analyst	Regulatory Analyst 2	\$80,292	0.07
Rulemaking Outreach Support	Community Outreach & Environmental Education Specialist 3	\$61,224	0.10
Rulemaking Lead	Environmental Planner 4	\$86,484	1.00
IT App Developer	It App Development-Journey	\$96,888	0.25
Technical Assistance/Compliance	Environmental Specialist 3	\$61,224	2.00
Workload Analysis Lead	Budget Analyst 4	\$82,344	0.01
Agency Admin Overhead FTE	Please see notes on costs below.		0.63
Total FTEs			4.83

Notes on Costs by Category

Salary estimates are current biennium actual rates at Step L.

Benefits are the agency average of 36.5% of salaries.

Goods and Services are the agency average of \$4,834 per direct program FTE.

Travel is the agency average of \$2,234 per direct program FTE.

Equipment is the agency average of \$1,230 per direct program FTE.

Agency Administrative Overhead is calculated at the federally approved agency indirect rate of 28.3% of direct program salaries and benefits.

Agency Administrative Overhead FTEs are included at 0.15 FTE per direct program FTE and are identified as Fiscal Analyst 2 and IT App Development - Journey.

Plastic Producer Annual Fee Calculation

The Fee Calculation

The law requires producers to pay a fee to cover the costs estimated in the pages above. The fair distribution of these costs will be determined through a rulemaking process in future years. For FY 2023, we will calculate the fees for producers using the weight of plastic resin each producer sold, distributed, or otherwise brought into the state of Washington. We do not have resin data to back up this process, and we do not know how many producers will register and provide information. Therefore, we cannot provide estimated costs per producer at this time. In future years, we will provide this information with the workload analysis.

The table below uses hypothetical sample data to show the calculation for the fee to be billed this year for Ecology’s FY 2023 costs, as required in RCW 70A.245.020 (3).¹

Table 3: Illustrated Hypothetical Calculation for FY 2023 Fee

Estimated Costs, FY 2023²: \$603,144

Fee Tier ³	Total WA Resin (in lbs.) ⁴	Tier % of Total Resin, or Tier % of total Cost ⁵	Total Share of Costs by Tier ⁶	Number Producers in Tier ⁷	Total fee per Producer in Tier ⁸
Tier 1 (1 to 100 lbs. resin per producer)	25,000	2%	\$9,168.00	499	\$18.37
Tier 2 (101 to 500 lbs. resin per producer)	175,000	11%	\$63,994.00	513	\$124.74
Tier 3 (501 to 1,000 lbs. resin per producer)	450,000	27%	\$164,477.00	476	\$345.54
Tier 4 (1,001 to 5,000 lbs. resin per producer)	1,000,000	61%	\$365,505.00	512	\$713.88
Totals	1,650,000	100%	\$603,144.00	2,000	

Description of Numbers and Calculations

1. Actual data for number of producers and their Washington resin values are not available until registration is completed by April 1 per statute. Because data is not available, only a description of the fee calculation method and sample calculation is provided. Actual fee levels would be calculated after registration is complete. Factors that would affect fee levels in this model are the number of producers, the range of Washington resin values across producers, and actual resin values.
2. The FY 2023 estimated cost is \$603,144.00. Cost basis and estimates are illustrated in the Workload Analysis on Pages 1 and 2.
3. The tiers used in this example are hypothetical and used for illustrative purposes only. The actual tiers will be established based on the range of resin weights reported by producers during annual registration. Tier 1 would include producers with the smallest resin weights, and Tier 4 would include the producers with the highest resin weights.
4. Total Washington resin for each tier is calculated by summing the Washington resin weight reported by all producers in each tier. For Tier 1 in this example, 499 producers registered, and the total resin weight reported by these producers is 25,000 pounds.
5. Tier percentage of total resin is calculated by dividing the tier's total Washington resin weight by the grand total resin weight across all four tiers. For Tier 1 in this example, this would be 25,000 pounds divided by the statewide registered total of 1,650,000 pounds. The resulting percentage of 2 percent represents Tier 1's share of total resin and will correspond to the tier's share of Ecology's total estimated costs (item 2).
6. The total share of costs by tier is calculated by multiplying Ecology's total estimated costs (item 2) by the tier's percentage of the state's total resin across all producers. For Tier 1 in this example, this would be the FY 2023 estimated costs of \$603,144.00 multiplied by the tier percentage of 2%.
7. The number of producers in each tier are the registered producers in each tier, based on their reported resin weights. For Tier 1 in this example, 499 producers have registered total WA resin values falling in the Tier 1 weight range.
8. The total fee per producer is calculated by dividing the tier's total share of costs by the number of producers in the tier. For Tier 1 in this example, the total cost of \$9,168 is divided equally among the 499 producers in the tier, so each would have a fee of \$18.37.

More information

Public Comments on this document are open until February 28, 2022. To provide comments, please visit [Post-Consumer Recycled Content \(PCR\) Workload Analysis, Fiscal Year \(FY\) 2023 \(commentinput.com\)](https://commentinput.com)

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