

UNIFORM ENVIRONMENTAL ENFORCEMENT ACT REPORT

10 V.S.A. § 8017

Submitted to the
President Pro Tempore of the Senate
Speaker of the House
House Committee on Natural Resources, Fish and Wildlife
Senate Committee on Natural Resources and Energy

by the
Agency of Natural Resources

February 13, 2020

10 V.S.A. § 8017

Annual Report

The Secretary and the Attorney General shall report annually to the President Pro Tempore of the Senate, the Speaker of the House, the House Committee on Natural Resources, Fish, and Wildlife, and the Senate Committee on Natural Resources and Energy. The report shall be filed on or before February 15, on the enforcement actions taken under this chapter, and on the status of citizen complaints about environmental problems in the State. The report shall describe, at a minimum, the number of violations, the actions taken, the disposition of cases, the amount of penalties collected, and the cost of administering the enforcement program. The provisions of 2 V.S.A. § 20(d) (expiration of required reports) shall not apply to the report to be made under this section. (Added 1989, No. 98, § 1; amended 2007, No. 191 (Adj. Sess.), § 9; 2013, No. 142 (Adj. Sess.), § 24; 2017, No. 113 (Adj. Sess.), § 49d; 2017, No. 168 (Adj. Sess.), § 19, eff. May 22, 2018; 2017, No. 113 (Adj. Sess.), § 49d.)

Table of Contents

I.	EXECUTIVE SUMMARY	4
II.	BACKGROUND	4
III.	ENVIRONMENTAL ENFORCEMENT IMPLEMENTATION.....	4
	Enforcement Process.....	4
	Enforcement Options	5
IV.	INITIATIVES	5
	Training.....	5
V.	TRANSPARENCY	6
VI.	COLLABORATION WITH STATE OF VERMONT ENTITIES	6
	Department of Forest, Parks and Recreation (DFPR).....	6
	Department of Fish and Wildlife (DFW).....	6
	Department of Public Service (DPS)	6
	Natural Resources Board (NRB)	6
	Agency of Agriculture, Food and Markets (AAFPM).....	6
	Attorney General’s Office (AGO)	7
	State’s Attorney, EPA, US Attorney.....	7
VII.	ENFORCEMENT ACTIONS AND PENALTIES COLLECTED	7
	2019 Summary, Common Complaint and Violation Categories	7
	Long-Term Trends	9
	Penalty Collections	9
VIII.	CIVIL CITATIONS.....	10
IX.	COST OF ADMINISTERING ENFORCEMENT PROGRAM.....	10
X.	ATTACHMENTS.....	10
	Attachment A	11
	Attachment B	11
	Attachment C	12
	Attachment D	16

I. EXECUTIVE SUMMARY

In 2019, the Department of Environmental Conservation (DEC) within the Agency of Natural Resources (ANR) recorded a total of 2,868 incidents. The Enforcement Section of the Environmental Compliance Division (ECD) in DEC is the investigative body of DEC. In 2019, 1870 incidents were received by ECD, and 998 were initiated or received by DEC programs with 583 of those being spill reports.

In 2019, approximately 88% of incidents were closed by ECD with no formal enforcement actions being taken. In 65% of incidents no violations were found and in 23% of incidents minor violations were found and voluntary compliance achieved. This highlights the benefit of ECD's eight Environmental Enforcement Officers (EEOs) investigating incidents to determine if a violation actually exists and the positive outcomes generated by EEOs during face to face communications with citizens to remedy violations.

In 2019, formal enforcement methods were used in 78 cases through the issuance of civil citations, Administrative Orders, or Assurances of Discontinuances. The cases resulted in \$417,220.80 in penalties assessed for the year directed to the general fund. The total costs of the administering the Environmental Compliance Division Enforcement Section were \$1,224,968.

II. BACKGROUND

The primary duty of the Enforcement Section of ECD is the investigation and documentation of any/all alleged violations of Vermont's environmental permits, rules, regulations, and statutes that are under the jurisdiction of DEC and for coordination on violations relating to the Natural Resources Board (NRB) and the Agency of Agriculture, Food and Markets (AAFM).

ECD's Enforcement Section is staffed by a Chief Environmental Enforcement Officer and Administrative Services Coordinator located in Montpelier and seven Environmental Enforcement Officers (EEOs) located within designated geographical districts throughout the state.

ANR's Enforcement and Litigation Section is housed within ANR's Office of General Counsel (OGC). The legal staff in this section handle formal enforcement that begins when an investigation ends and includes brokering settlement agreements and representing ANR in court proceedings related to formal enforcement actions. ECD and OGC work closely to bring cases identified by program staff located with the Department or EEOs to legal resolution.

III. ENVIRONMENTAL ENFORCEMENT IMPLEMENTATION

Enforcement Process

When a violation is found, EEOs or the programs within DEC may issue a Notice of Alleged Violation (NOAV) to the violator. The NOAVs serve not only to provide notice of a violation but also to outline the corrective actions required to bring the violator into compliance and a timeframe within which to do so. When voluntary compliance is not forthcoming or when violations are identified as priorities, formal enforcement is recommended.

ECD is guided by a Strategic Overlay that identifies priority areas where a violation should proceed to formal enforcement action (i.e. penalties and/or corrective actions). Examples of these factors utilized for prioritization include when a violation is particularly egregious, repeated, or cannot be corrected. In those instances (and others), an enforcement action may be initiated immediately without the issuance of a NOAV. Under certain circumstances DEC is authorized to seek Emergency Orders (immediate injunctive relief) from the Superior Court, Environmental Division.

The Enforcement Referral Review Committee, formed in the fall of 2015, serves as a forum to provide timely, consistent, and transparent oversight on enforcement activities within ANR and to assure that consistently high-quality referrals are being sent to OGC. It is chaired by the Section Chief of the Enforcement & Litigation Section of OGC. The Chief Environmental Enforcement Officer, the Director of ECD, and the general counsels of ANR, DEC, the Department of Forest, Parks and Recreation (DFPR), and the Department of Fish and Wildlife (DFW) are permanent members. Representatives from each DEC division and DFPR also attend.

Enforcement Options

Once a case is referred, OGC staff focus on the efficient advancement of the case and the achievement of a fair and consistent outcome. Both OGC and Enforcement Section staff work with the programs to improve the quality and consistency of enforcement referrals.

In most instances, formal enforcement actions include an initial attempt to resolve the violation through a negotiated settlement by means of an Assurance of Discontinuance (AOD). Settlements usually include, among other provisions, an agreed penalty and corrective action. Supplemental Environmental Projects (SEPs) are infrequently used in settlements in addition to the penalty.

If a settlement cannot be reached, an Administrative Order (AO) is typically prepared and served. The filing of an AO can result in a trial before the Environmental Division of the Vermont Judiciary's Superior Court when a hearing is requested. Most AOs contain provisions for payment of a civil penalty and corrective actions when appropriate, as well as a requirement of future compliance.

Final orders signed by the Environmental Division are tracked for compliance by the appropriate regulatory program(s). ECD tracks penalties to ensure payment and tracks Supplemental Environmental Projects (SEP) to ensure payment and performance. In 2016, a collections agency was retained by ANR to help ensure collections of fines and remains in use.

IV. INITIATIVES

Training

ECD continues to champion the value of and need for additional investigative training for ANR staff. In response to this need, ECD and OGC legal staff have developed several levels of trainings for ANR staff. Trainings on the enforcement database and on basic enforcement process and protocols are provided several times a year. In 2019, ECD and OGC launched an additional training series on conducting inspections, taking photos, and writing reports.

In 2019, ECD and OGC offered 17 training sessions that were attended by 205 participants (composed of 82 unique ANR staff attending at least one and up to five different sessions).

V. TRANSPARENCY

Information regarding enforcement actions is available to the public via our updated web page <http://dec.vermont.gov/enforcement>. Staff contact information, how to file a complaint (anonymous, if desired), media releases, enforcement actions, and a list of supplemental environmental projects (SEPs) are posted on this site.

ECD posts proposed settlements, orders, and citations for public comment. ECD evaluates all public comments prior to sending any settlement, order or citation to the Environmental Division. ECD continues to identify opportunities to improve transparency and to communicate with the citizens of Vermont. Also, ECD regularly contributes posts to DEC social media accounts.

VI. COLLABORATION WITH STATE OF VERMONT ENTITIES

Department of Forest, Parks and Recreation (DFPR)

ECD investigates Acceptable Management Practices (AMP) and Heavy Cut incidents for DFPR. ECD continues to actively work with DFPR to increase our collaborative effectiveness.

Department of Fish and Wildlife (DFW)

EEOs coordinated with DFW Game Wardens on multiple issues over the course of the year. The Wardens and the EEOs have a long history of coordination on issues relating to many aspects of both DEC and DFW jurisdiction. Some of these areas include sharing information related to potential violations and providing assistance to each other in the field.

Department of Public Service (DPS)

Under Act 130 in 2016, the Vermont State Assembly directed the Department of Public Service (DPS) to establish and implement a complaint protocol. The Department of Public Service investigates complaints about the alleged failure of a CPG holder to comply with the terms and conditions of a CPG issued by the Public Utility Commission under 30 V.S.A. §§ 248 or 248a. Occasionally, those terms and conditions overlap with ANR permits, so coordination between the two entities is required.

Natural Resources Board (NRB)

Guided by our Memorandum of Understanding (MOU) with the Natural Resources Board (NRB), we share both investigative and legal resources in mixed NRB/ANR cases. In 2019, one mixed NRB/ANR case was resolved by ANR and four mixed NRB/ANR cases were resolved by the NRB.

Agency of Agriculture, Food and Markets (AAFM)

ANR has jurisdiction on farms regarding non-water quality related environmental violations. AAFM and DEC share jurisdiction over water quality related violations. ANR has primacy on all point source

discharges while AAFM has primacy on nonpoint source discharges and Required Agricultural Practice violations.

A joint ANR/AAFM MOU outlines a general framework for the Agencies to coordinate on compliance and enforcement issues.

Each Agency has their own procedures and standard operating procedures for enforcement and, both agencies continue to work through the challenges related to information sharing, incident identification, investigation and response to potential or actual violations.

Attorney General's Office (AGO)

ANR continues to work closely and effectively with the AGO, meeting with them and AAFM each quarter to discuss agricultural incidents or potential cases. During 2019, ANR referred five enforcement cases to the AGO: three agricultural discharge cases, one mixed unpermitted discharge and solid waste case, and one mixed air quality and solid waste case. In addition, all criminal cases developed and investigated by the ANR are referred to the AGO. Two ANR-referred cases were closed by the AGO during the year.

ANR provides information on new cases to the AGO on a weekly basis. The MOU between the two organizations is also reviewed annually to ensure its continued effectiveness.

State's Attorney, EPA, US Attorney

Typically, smaller criminal cases where a strong local interest is demonstrated are referred to State's Attorneys for criminal prosecution. We also work and coordinate our efforts with the Environmental Protection Agency (EPA) on matters of federal and state interest, including both civil and criminal matters. Finally, where appropriate we coordinate with the U.S. Attorney's office on both civil and criminal matters. No cases were referred for criminal prosecution this year.

VII. ENFORCEMENT ACTIONS AND PENALTIES COLLECTED

2019 Summary, Common Complaint and Violation Categories

In 2019, approximately 88% of incidents were closed by ECD with no formal enforcement actions being taken. In 65% of incidents no violations were found and in 23% of incidents minor violations were found and voluntary compliance achieved.. This highlights the benefit of having ECD's eight Environmental Enforcement Officers (EEOs) investigate incidents to determine if a violation actually exists and the positive outcomes generated by EEOs during face to face communications with citizens when they do.

In 2019, the most common categories of incidents are presented in Figure 1 below.

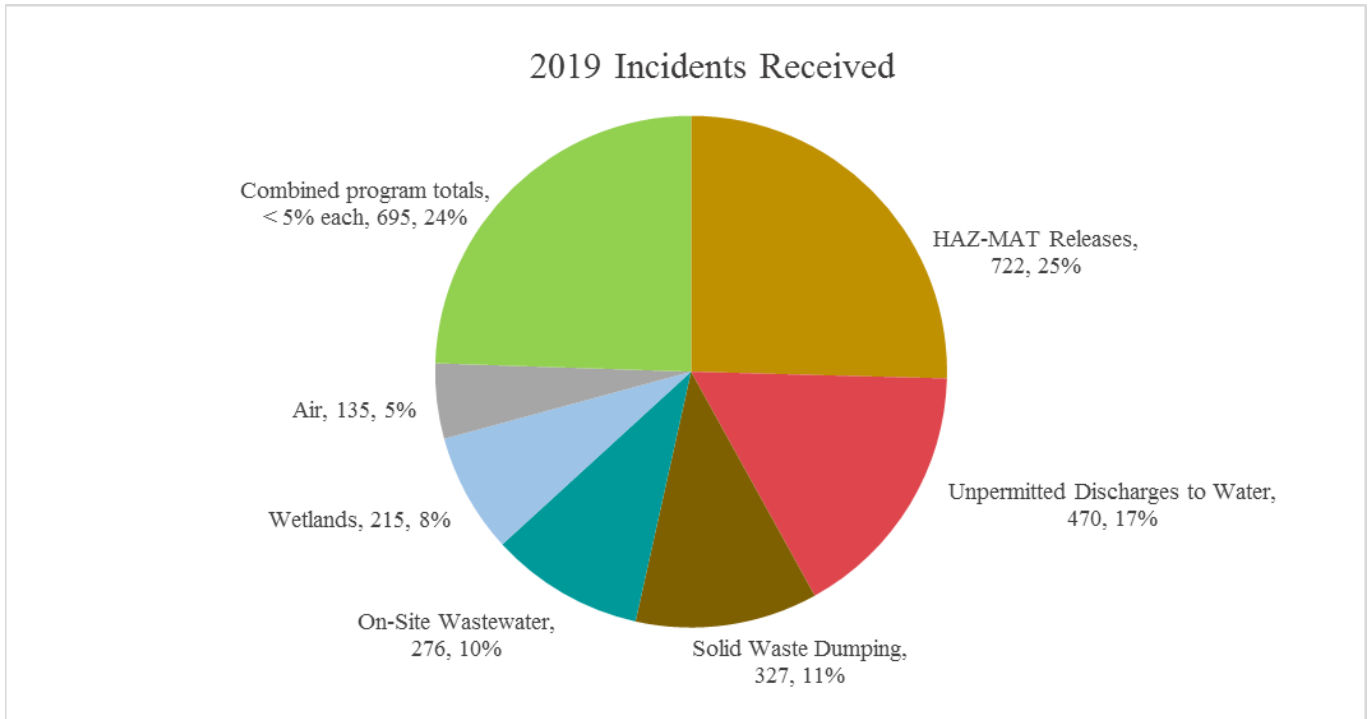


Figure 1. Major Categories of DEC Incidents Received in 2019.

The top categories of violations found are presented in Figure 2.

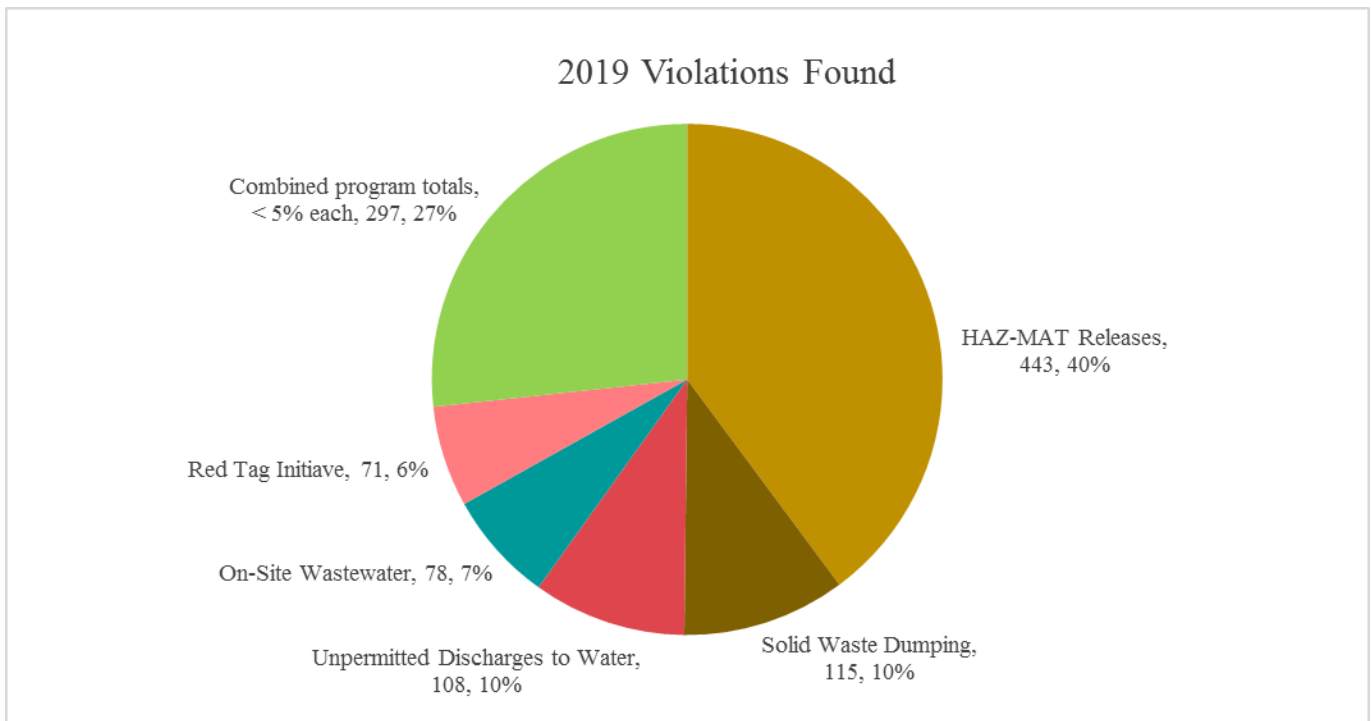


Figure 2. Major Categories of DEC Violations Found in 2019.

Long-Term Trends

Looking at long-term data in the chart below, the number of incidents received each year is generally increasing. In 2018, we added complaint information from DEC programs. This information will be tracked going forward, with improvements in reporting planned for 2020. In 2019, 1870 incidents were received by ECD and 998 incidents were initiated or received directly by media programs.

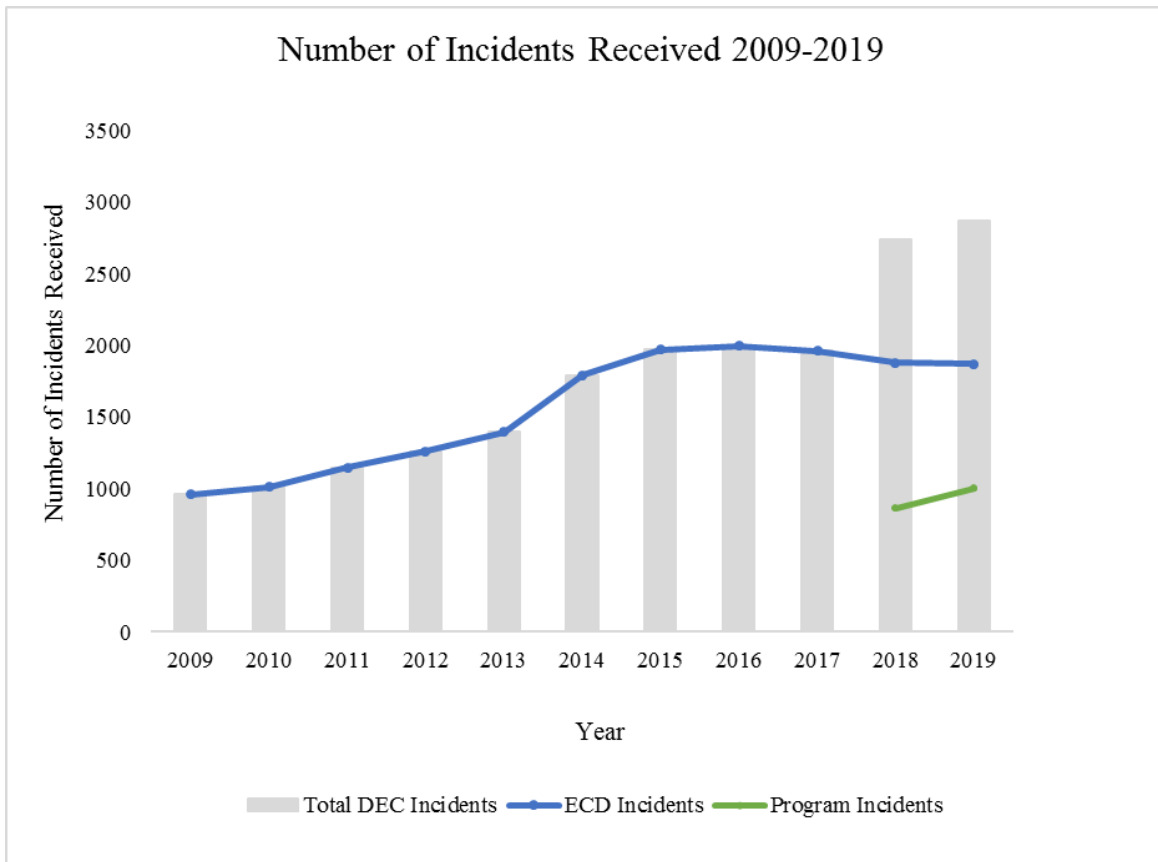


Figure 3. Incidents Received by Year. ECD data is presented since 2009. For the second year, incidents handled exclusively by program staff are reported as the green line. The gray bars depicts the total number of incidents received by DEC (ECD + Program Incidents).

Penalty Collections

ECD robustly tracks the collection of penalties assessed by DEC. Collection tools include referral to a collections agency, tax “setoff”, property lien attachment, trustee process, or any other collections option as allowed under applicable law, including filing a motion for contempt of court.

In 2019, ANR assessed approximately \$417,220 in penalties and collected approximately \$330,380 in penalties. We sent 6 cases with approximately \$76,748 of delinquent debt to the collection agency on retainer with ANR, and 26 individuals with approximately \$231,896 of delinquent debt to Vermont Tax Department Setoff Program as an additional collections option.

DEC has continued its use of an Exclusion List that contains entities that are subject to possible sanctions because of non-payment. This list facilitates the Department’s requirement to deny the issuance of a new permit, grant, or contract due to delinquent penalty or other payments to the Department.

VIII. CIVIL CITATIONS

In late 2011, a rule to implement expanded civil citation authority went into effect. The rule allows civil citations to be issued in all program areas in which ANR has jurisdiction to bring an enforcement action, with penalties up to a maximum of \$3,000. Penalty payment is tracked and appeals of these citations are heard by the Environmental Division of the Superior Court.

In 2019, 39 citations were issued by ECD assessing \$25,050.00 in penalties

In 2019, ECD began the process of updating its citation rule. The rule is currently on public notice. More information and the proposed rule can be found at: <https://dec.vermont.gov/enforcement/rules/>.

IX. COST OF ADMINISTERING ENFORCEMENT PROGRAM

The Environmental Compliance Division's budget includes both assistance and enforcement efforts. For purposes of this report, the enforcement component of the budget and operating expenditures in fiscal year 2019 are reported, as follows:

Interdepartmental Funds **\$1,224,968**

X. ATTACHMENTS

In further response to the requirements of 10 V.S.A. § 8017 (Annual Report), the following Attachments are provided.

- Attachment A summarizes Formal Court Actions including Assurances of Discontinuance and Civil Citations in 2019. (ANR data).
- Attachment B reflects Administrative Orders, Emergency Orders and Dismissed or Consolidated Cases in 2019. (ANR data).
- Attachment C summarizes all incidents received by or resolved by the Environmental Compliance Division in 2019. (ECD Data).
- Attachment D presents incidents received or resolved by DEC program staff outside of the Environmental Compliance Division in 2019. (DEC program staff data).

Attachment A
Formal Court Actions; Assurances of Discontinuance and Civil Citations
January 1, 2019 – December 31, 2019

Regulatory Programs	# AODs Issued	\$ AOD Penalties Assessed	\$ AOD Penalties Collected	# Citations Issued	\$ Value of Citations	\$ Citation Collected
<i>Air Quality & Climate Division</i>	3	\$23,750.00	\$23,050.00	5	\$1,200.00	\$1,200.00
<i>Department of Fish and Wildlife</i>						
<i>Department of Forests, Parks, & Recreation</i>			\$4,180.00			
<i>Drinking Water & Groundwater Protection Division</i>	4	\$41,375.00	\$40,824.96			
<i>Environmental Compliance Division</i>	1	\$21,000.00	\$13,125.00	1	\$450.00	\$450.00
<i>Natural Resources Board</i>						
<i>Waste Management & Prevention Division</i>	17	\$114,560.00	\$127,563.98	27	\$19,950.00	\$4,950.00
<i>Watershed Management Division</i>	6	\$80,675.00	\$71,011.25	6	\$3,450.00	\$3,450.00
<i>Water Investment Division</i>						
TOTALS	31	\$281,360.00	\$279,755.19	39	\$25,050.00	\$10,050.00

Attachment B
Administrative Orders (AOs), Emergency Orders (EOs), & Dismissed Cases
January 1, 2019 – December 31, 2019

Regulatory Programs	# AOs Issued	\$ AO Final Penalties	\$ AO Penalties Collected	# EOs Issued	Closed Informally*
<i>Air Quality & Climate Division</i>	3	\$35,562.00	\$2,570.77		
<i>Department of Fish and Wildlife</i>					
<i>Department of Forests, Parks, & Recreation</i>					
<i>Drinking Water & Groundwater Protection Division</i>	1	\$9,000.00			
<i>Environmental Compliance Division</i>			\$6,750.00		1
<i>Natural Resources Board</i>					
<i>Waste Management & Prevention Division</i>	3	\$57,248.80	\$15,515.00		1
<i>Watershed Management Division</i>	1	\$9,000.00	\$14,135.00		3
<i>Water Investment Division</i>					
TOTALS	8	\$110,810.80	\$38,970.77	0	5

*e.g. an enforcement attorney was able to obtain compliance without the need for formal, legal action, or further investigation may reveal that an enforcement action was no longer needed or appropriate, or one case is consolidated with another and closed.

Attachment C
Summary of Incidents Received and/or Resolved as Recorded by
DEC's Environmental Compliance Division
January 1, 2019 – December 31, 2019

Regulatory Programs	Total Incidents Received 2019	Pending Of Those Received in 2019	Closed No Violation	Closed NOAV Issued	Closed Citation Requested/ Issued	Closed Voluntarily Corrected/ No Further Action Required	Closed Formal Action Requested/ Taken	Closed No Formal Action Taken*	Total Closed
Air Quality & Climate Division - 76 Closed									
<i>Permitting & Engineering</i>									
<i>Compliance/ Field Services</i>	105	40	40	1	4	25	2	4	76
<i>Air Monitoring</i>									
<i>Mobile Sources</i>									
<i>Planning</i>									
Department of Forests, Parks, and Recreation - 6 Closed									
<i>Forest Operations</i>	10	4	5			1			6
Drinking Water & Groundwater Protection Division - 215 Closed									
<i>On-Site</i>	252	96	134	21		35	13		203
<i>Engineering and Operations Capacity</i>									
<i>Compliance and Support Services</i>	2	1	1						1
<i>Water Resources</i>	4	3	3			1			4
<i>Indirect Discharge/UIC</i>	11	5	5			1	1		7

Regulatory Programs	Total Incidents Received 2019	Pending Of Those Received in 2019	Closed No Violation	Closed NOAV Issued	Closed Citation Requested/ Issued	Closed Voluntarily Corrected/ No Further Action Required	Closed Formal Action Requested/ Taken	Closed No Formal Action Taken*	Total Closed
Environmental Compliance Division - 484 Closed									
<i>Unpermitted Discharges (HAZ)</i>	34	12	16			6	1	1	24
<i>Unpermitted Discharges (1259)</i>	286	78	179	3	2	33	2	6	225
<i>Unpermitted Discharges (AMPs)</i>	19	7	9			1			10
<i>Unpermitted Discharges (SED)</i>	10	5	4			1			5
<i>Unpermitted Discharges (AAPs)</i>	117	15	82			8	29	2	121
<i>Abandoned Boats</i>									0
<i>Assistance</i>									0
<i>PREvent</i>	10	7	3			1			4
<i>RED TAG Initiative</i>	35	9	24			69	2		95
Natural Resources Board - 37 Closed									
<i>A250 Districts</i>	28	12	18	1		18			37

Regulatory Programs	Total Incidents Received 2019	Pending Of Those Received in 2019	Closed No Violation	Closed NOAV Issued	Closed Citation Requested/ Issued	Closed Voluntarily Corrected/ No Further Action Required	Closed Formal Action Requested/ Taken	Closed No Formal Action Taken*	Total Closed
Waste Management & Prevention Division - 383 Closed									
<i>Haz-Mat Releases/ Spills</i>	139	45	68		1	26	9	2	106
<i>Salvage Yards</i>	59	38	22			4	5		31
<i>RCRA</i>	39	19	16			6		2	24
<i>AST/UST</i>	23	7	4		2	2	6		14
<i>Contaminated Sites</i>	5	2	3						3
<i>Solid Waste - Compliance</i>	248	84	111	3	8	49	8	14	193
<i>Solid Waste - Certification</i>	6	4	1	2		1	1		5
<i>Solid Waste - Materials Management</i>			1			2			3
<i>Residuals Management</i>	8	2	4						4

Regulatory Programs	Total Incidents Received 2019	Pending Of Those Received in 2019	Closed No Violation	Closed NOAV Issued	Closed Citation Requested/ Issued	Closed Voluntarily Corrected/ No Further Action Required	Closed Formal Action Requested/ Taken	Closed No Formal Action Taken*	Total Closed
Watershed Management Division - 273 Closed									
<i>Lakes & Ponds</i>	101	40	44	3	2	10	11		70
<i>Stormwater</i>	62	25	30	1	2	5			38
<i>Monitoring and Assessment</i>									0
<i>River Corridor Management</i>	59	22	33		1	3			37
<i>Wetlands</i>	166	57	94	1	2	22			119
<i>BOSS</i>									0
<i>Wastewater/ Discharge Permits</i>	17	9	5			4			9
Water Investment Division - 10 Closed									
<i>Dam Safety</i>	14	4	10						10
<i>Clean Water Initiative</i>	1	1							
<i>Water Infrastructure Engineering</i>									
<i>Water Infrastructure Financial</i>									
<i>Planning and Pollution Accounting</i>									
TOTALS	1870	653	969	36	24	334	90	31	1484

*Reflects complaints closed through other means, e.g. lack of evidence, lack of cooperation from complainant, referred to the appropriate regulatory program or NRB, unable to respond, or violation found/enforcement action not pursued

Attachment D
Incidents Received and/or Resolved directly Recorded by DEC Programs
January 1, 2019 – December 31, 2019

While the majority of ECD's work is conducted to serve all DEC programs holistically, this annual report now also contains enforcement data for work conducted by DEC programs separately.

Regulatory Programs	Total Incidents Received 2019	Pending Of Those Received in 2019	Closed No Violation	Closed NOAV Issued	Closed Citation Requested/ Issued	Closed Voluntarily Corrected/ No Further Action Required	Closed Formal Action Requested/ Taken	Closed No Formal Action Taken*	Total Closed
Air Quality & Climate Division - 19 Closed									
<i>Permitting & Engineering</i>									
<i>Compliance/ Field Services</i>	30	12	9	1		5	4		19
<i>Air Monitoring</i>									
<i>Mobile Sources</i>									
<i>Planning</i>									
Department of Forests, Parks, and Recreation - 0 Closed									
<i>Forest Operations</i>	3	3							
Drinking Water & Groundwater Protection Division - 33 Closed									
<i>On-Site</i>	24	6	13			6		3	22
<i>Engineering and Operations Capacity</i>									
<i>Compliance and Support Services</i>	1	1					1		1
<i>Water Resources</i>									
<i>Indirect Discharge/UIC</i>	18	8		10					10

Regulatory Programs	Total Incidents Received 2019	Pending Of Those Received in 2019	Closed No Violation	Closed NOAV Issued	Closed Citation Requested/ Issued	Closed Voluntarily Corrected/ No Further Action Required	Closed Formal Action Requested/ Taken	Closed No Formal Action Taken*	Total Closed
Environmental Compliance Division - 19 Closed									
<i>Unpermitted Discharges (HAZ)</i>									
<i>Unpermitted Discharges (1259)</i>	1		6			11			17
<i>Unpermitted Discharges (AMPs)</i>	1	1							
<i>Unpermitted Discharges (SED)</i>									
<i>Unpermitted Discharges (AAPs)</i>	2					2			2
Waste Management & Prevention Division - 700 Closed									
<i>Haz-Mat Releases/ Spills</i>	583	158	30	3		354		48	435
<i>Salvage Yards</i>	62	35	41	1		27	7		76
<i>RCRA</i>	5	1	2			2	4		8
<i>AST/UST</i>	23	1	9		1	5	2	2	19
<i>Contaminated Sites</i>	3	1	1				1		2
<i>Solid Waste - Compliance</i>	79	26	44	10		19	4		77
<i>Solid Waste - Certification</i>	4	2	46	6		15	1		68
<i>Solid Waste - Materials Management</i>	23	9	7			6			13
<i>Residuals Management</i>	2		2						2

Regulatory Programs	Total Incidents Received 2019	Pending Of Those Received in 2019	Closed No Violation	Closed NOAV Issued	Closed Citation Requested/ Issued	Closed Voluntarily Corrected/ No Further Action Required	Closed Formal Action Requested/ Taken	Closed No Formal Action Taken*	Total Closed
Watershed Management Division - 107 Closed									
<i>Lakes & Ponds</i>	4	2	3			3			6
<i>Stormwater</i>	21	19		3		5			8
<i>Monitoring and Assessment</i>									
<i>River Corridor Management</i>	52	3	42			6		1	49
<i>Wetlands</i>	49	26	19	3		16	1	3	42
<i>BOSS</i>									
<i>Wastewater/ Discharge Permits</i>	1	2				1	1		2
Water Investment Division - 19 Closed									
<i>Dam Safety</i>	2	2							
<i>Clean Water Initiative</i>	5	4	7			12			19
<i>Water Infrastructure Engineering</i>									
<i>Water Infrastructure Financial</i>									
<i>Planning and Pollution Accounting</i>									
TOTALS	998	322	281	37	1	495	26	57	897

*Reflects complaints closed through other means, e.g. lack of evidence, lack of cooperation from complainant, referred to the appropriate regulatory program or NRB, unable to respond, or violation found/enforcement action not pursued