

Missouri Department of

Natural Resources

Suggestions for New and Enhanced Clean Water Services



Sources of Input

- Top 5 Suggestions from the May 1, 2012 Meeting
- Expedited Permitting
- On-line Permitting and Similar Efficiency Measures

Suggestion 1: All permit categories should pay fully for the cost to issue and administer permits

The Challenge:

- No area is fully “paying”
- Viable program depends on more than covering the permitting cost
- Must include all costs (including assistance, monitoring and analysis, enforcement, and other aspects of the program and department)

What Are We Doing?

- Implemented more detailed time accounting to enable us to better understand our costs.
- Provided stakeholders with analysis outlining costs to issue, service and support Missouri state operating permits

What More Can We Do?

- Adjust fees and fee structure
- Determine how to fund a fully viable program at the level of service stakeholders desire

Suggestion 2 (in three parts)

1. Increase Quality Control, Consistency, Timeliness & Affordability Analysis in Permits
2. Decrease Arbitrariness in Permits
3. Permit Requirements should be based in Law and Regulations

Suggestion 2, Part 1: Increase Quality Control, Consistency, Timeliness & Affordability Analysis in Permits

The Challenge:

- All good ideas, but conflict with each other
- Affordability provision adds time to the permit process
- Additional steps - not required but requested by stakeholders (pre-PN review, meetings, etc.) – adds quality control and time to the permit process
- Permit writers use facility and receiving stream characteristics to determine protective and appropriate limits; at first blush, permits may appear inconsistent or arbitrary until specifics are examined.

What Are We Doing?

- Centralized permitting for all permits
- Developed procedure for affordability findings
- Reassigning staff for construction permits

What More Can We Do?

- QC protocols for permit and affordability analyses
- ID potential timeliness issues and adjust staffing
- Develop GP for some small domestic waste facilities; staff focus on remaining site-specific permits

Suggestion 2, Part 2: Decrease Arbitrariness in Permits

The Challenge:

- Permits may appear to be arbitrary
- Each permits' limits are based on the facility discharge and receiving stream characteristics
- They are protective and appropriate for that discharge/location

What Are We Doing?

- Rationale and calculations for permit limits are included with every permit
- Published as Fact Sheets or Statements of Basis
- Expanded pre-public notice review opportunity

What More Can We Do?

- Feedback?

Suggestion 2, Part 3: Permit Requirements should be based in law and regulations

The Challenge: Not all situations are covered under the laws and regulations and must be determined via policy or Best Professional Judgment

What Are We Doing?

- Centralized Permits – issued from one office instead of six
- Rationale and calculations for permit limits are included with every permit (Fact Sheets/Statements of Basis)

What More Can We Do?

- Feedback?

Suggestion 3: Education – more collaboration between governments, industry and public

The Challenge: Be available, prepared and responsive in for educational opportunities while processing consistent, timely, affordable and legal permits.

What Are We Doing?

- Convened meetings on all significant issues facing clean water (standards, effluent regs, disinfection, WET testing, nutrients, affordability, design guides, etc.)
- Regional Forums
- Been available to the extent possible

What More Can We Do?

- Feedback?

Suggestion 4: Compliance Assistance – More, Before, Separate

The Challenge:

- Provide compliance assistance to regulated parties outside of or in parallel to the normal permitting, inspection, and enforcement processes

What Are We Doing?

- Formed internal compliance assistance workgroup
- Scheduling stakeholder meetings

What More Can We Do?

- Develop comprehensive strategy for compliance assistance

Suggestion 5: Support state-integrated water program that continues DNR historic functions and maintains viable, delegated program

The Challenge:

- EPA approval needed for PPG flexibility
- SRF stakeholders want SRF fees used in SRF
- Complicated issues
- Diverse stakeholder group

What Are We Doing?

- Utilizing flexibility in authorized uses of funds to maintain delegated program
- Conducting fees stakeholder meetings

What More Can We Do?

- Adjust fees and fee structure
- Work with stakeholders to determine how to fund a fully viable program at the desired service level

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Additional Suggestion: Create expedited permit options

What Are The Challenges?

- Available staff and resources
- Economic disparity between those who can and cannot pay
- Still have to meet statutory requirements
- If everyone has expedited permits, then nobody has expedited permits

What Are We Doing?

- Electronic permitting for land disturbance
- Meeting statutory timeframes for new permits (in most cases)

What More Can We Do?

- Incorporate more permitting functionality into electronic permitting
- Develop a process for expedited construction and/or site-specific permits

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Additional Suggestion: Online Permitting
and Increase Efficiency

What Are We Doing?

- Electronic permitting
- Centralized permitting
- Watershed-based management

What More Can We Do?

- eDMRs & other uses of technology
- Additional electronic permitting functions
- Business Process Analysis
- Program Review

Additional Suggestions

The List Goes On.....

- 80+ suggestions
- Will post to Clean Water Fees web site



Thank you for the quality and thoughtfulness of the suggestions!