



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

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MEMORANDUM

DATE: FEB - 3 2011

TO: Water Pollution Control Branch Staff
Regional Directors
Regional Office Water Pollution Staff

FROM: Leanne Tippett Mosby, Director *LT*
Division of Environmental Quality

SUBJECT: Communication and Coordination with Permit Applicants, Permittees
and the Public

The Department is constantly searching for new opportunities and different strategies to improve our service to Missouri citizens while ensuring the Department's mission is not compromised. Recent discussions with various stakeholders provided me with an opportunity to hear their perspectives for improved process efficiency and service delivery. I also welcome your thoughts on how we can improve our services and eliminate unnecessary burden internally and externally.

Through the coordination of our ideas, we can create and administer a range of good policies and procedures that recognize and account for diverse conditions. Meanwhile, it is important to recognize that the continual emergence of challenging issues requires a flexible organization that can deliver immediate and effective responses; thus, I am hereby instituting mandatory and immediate improvements in our permit process. Effective immediately:

- All applicants for individual, site-specific permits or wastewater construction permits shall be afforded an opportunity for at least one meeting or conference call with the permit writer/engineer prior to completion of the draft permit. Good communication between permit applicants and permit writers/engineers is essential to writing sound, defensible permits.
- This opportunity shall be conveyed through a letter to the applicant upon receipt of a complete application. The letter will provide the contact information for the permit writer/engineer and, if possible, the general timeframe for application processing. A template of this letter is attached. All offices shall use the same template. If you have suggestions for changes to the template, submit them through your appropriate management chain for consideration.
- All permit applicants shall be given a draft permit for a technical review period of at least 15 working days in advance of the planned public notice date. A template of this letter is attached. All offices shall use the same template. If an applicant requests additional time for review, the permit writer/engineer shall grant additional time. If the permit writer/engineer is concerned about the amount of time requested by the applicant, (s)he may consult with the Water Protection Program's Permit Section Chief, prior to granting the extension.

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- The time for review by the applicant shall be tracked in MoCWIS and shall not be counted against the 180-day timeframe for permit issuance (i.e., the clock stops during applicant review).
- Pre-application meetings are encouraged if appropriate. Such meetings facilitate a good understanding of a proposed project and foster successful communication between applicants and the Department.
- There shall be no deviation from a General Permit Template.
- Both Construction and Operating Permits must be written consistent with Federal and State regulations and in accordance with written Water Protection Program procedures and guidance.

Professional interaction and quality communication with all members of the public, including our permit applicants, permittees and concerned citizens is imperative for enhancing credibility and building trust. I am hereby instituting mandatory and immediate improvements in our communication practices. Effective immediately:

- Consultation and coordination with EPA on all aspects of water-related issues needs to go through Water Protection Program Section Chiefs.
- Communications with permit applicants, permittees, other members of the regulated community and concerned citizens shall be documented through e-mails or notes, and placed in the appropriate file. This includes summaries of conversations via telephone or in meetings.
- All water pollution staff are to refer to the appropriate manuals and information in the Sharepoint application (to be developed and shared by the Water Protection Program) for guidance on all aspects of job functions or policy.
- The Water Protection Program recognizes the continual evolution of technical and policy issues. To reduce inconsistency and to ensure all information is readily available to water pollution staff, the Water Protection Program Section Chiefs will utilize the SharePoint application to create a compendium to store and disseminate policies, procedures and other information related to job functions until the appropriate manuals can be updated.

Should you have any questions, please contact Mr. John Madras at (573) 751-6721.

Thank you.

LTM:jml

Attachments