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
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
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!