



MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

Integrated Planning

Lacey Hirschvogel

02/16/2016

Integrated Plans

- Unique for every community
- Appropriate sequencing or scheduling of work
- **Does not remove the obligation to comply**

Integrated Plan Framework

- Background
- Principles
- 4 Key Elements
- Implementation

Comprehensive Principles

1. Maintain existing regulatory standards
2. Highest public health and environmental risk first
3. Developed by the municipality
4. Green infrastructure is encouraged
5. Modify an existing schedule of compliance

Integrated Plans should:

- Incorporate DNR input
- Include the **specifics!**
 - Dates the municipality can commit to,
 - Environmental and Public Health obligations
- Reasonable

Integrated Plans should:

- Detail the community's financial capability.
 - Capability of a community to make water quality related improvements
 - Support documentation for the scheduled plan
 - Example: A small community cannot begin another project until they have adequate bonding capacity

Integrated Plans should:

- Include an alternatives analysis
- Include supporting documents that detail use of estimated costs for the selected treatment
- Lay-out potential rate structures

Integrated Plans should:

- All Technology Based Effluent Limits should be met
- Green infrastructure when feasible
- Community engagement
- Monitoring and reporting on the plan

4 Key Elements

1. Regulatory issue addressed
2. Existing infrastructure (condition and performance)
3. Process for identifying, evaluating and selecting treatment types and proposing implementation schedules
4. Monitoring and Modifications

1. Regulatory issue

- Dates of compliance schedules
- All new requirements needed to be addressed
- I.D. human health threats
- I.D. environmental impairments (i.e. 303(d) listed streams, brownfields, wetlands, etc.)
- Metrics

2. Existing Infrastructure

- I.D. municipalities and utilities that are participating in the plan
- List all permits (issued, expired, PN)
- Recent inspection reports
- Enforcement documents

3. Process for identifying, evaluating and selecting treatment types and proposing implementation schedules
 - Details on the schedule
 - Reasonable dates
 - Cost of Alternative Treatment (land app., green infrastructure)
 - Community involvement

3. Process for identifying, evaluating and selecting treatment types and proposing implementation schedules
 - I.D. of the project(s) selected
 - Supporting documents
 - Financial capabilities of municipality
 - Bonding capacity, potential revenue sources, etc.
 - Anticipated costs
 - Project funding

3. Process for identifying, evaluating and selecting treatment types and proposing implementation schedules
- Detailed description of priorities
 - Adverse impacts of current infrastructure
 - Proposed implementation schedules
 - Maturity dates of bonds,
 - Complete debt retirement of current debt,
 - Planned rate or fee increases,
 - Etc.

4. Monitoring and Modifications

- Mechanism for annual evaluations or reporting
- Plan evaluated every year and revised every 5 years
- Communication with MDNR

Implementation

- Consistent with 40 CFR § 122.47,
- When seeking an extension through the WPP, the requirements of the MCWL and CWA should be prioritized first,
- Can be used in conjunction with an enforcement action

Integrated Plans and any attachments should be submitted electronically and by mail to:

Department of Natural Resources
Water Protection Program
attn: Lacey Hirschvogel
P.O. Box 176
Jefferson City, MO 65102
lacey.hirschvogel@dnr.mo.gov

Questions? Comments? Concerns?

Lacey Hirschvogel

lacey.hirschvogel@dnr.mo.gov

573-751-9391