

The Benefits of Voluntary Agreements and A New Take on Enforcement

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Control

ENFORCEMENT?

- Negative connotation-being sent to the principal's office is bad
 - Penalties, fees, fines-for clarity DNR is authorized to pursue administrative penalties based on a rigid penalty assessment protocol defined in 10 CSR 20-3.010 [10c20-3–Clean Water Commission](#)
 - Compliance=costs, with thin profit margins, minimizing costs is logical but sometimes that can lead to cutting corners and creates a need for regulatory enforcement
 - Black eye, perception is everything, so why encourage permittees to seek enforcement?

Brief Evolution of Enforcement

- Punitive orders, rigid process, assess penalty with the matrix, draft corrective actions, send out the door and wait for noncompliance with order-rinse and repeat
- Rise in reputable utilities operating companies purchasing struggling/failing wwtf's- developed the Acquisition AOC- our first voluntary legally binding orders
 - Consolidation-helped reduce SNC and close enforcement cases
 - Success in expedited return to compliance, we applied the same principals to "standard" referrals to enforcement.

Lead with Compliance Assistance

- The other side of the section, **Compliance** and Enforcement
- In coordination with the Regional Offices, we explored:
 - Alternative inspection types-focused, desk audit
 - Regional Office Compliance Agreements (ROCAs)

Compliance Assistance

Beyond the inspection:

- Permitting
- Sampling
- Data Management / Reporting
- Operations
- General Public (concerns)

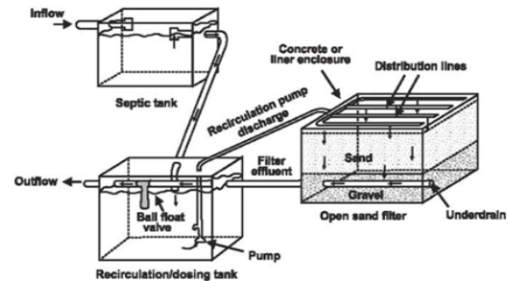
Compliance Assistance

Recirculating Media Filter Operation and Maintenance - PUB2738

Water Protection Program fact sheet
Division of Environmental Quality Director: Art Goodin



Sorrento Square, Camden County, Missouri -
photographed by Tray Petteiger, SWRO Environmental
Specialist



Optimizing Recirculating Media Filters for Ammonia Treatment - PUB2737

Water Protection Program fact sheet
Division of Environmental Quality Director: Art Goodin

Printer Friendly Version

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MISSOURI DEPARTMENT OF NATURAL RESOURCES
WATER PROTECTION PROGRAM
INDUSTRIAL PERMITS
LAND APPLICATION MANAGEMENT PLAN TEMPLATE

Land Application Management Plan

Insert Facility Name
Insert Facility Address
Insert Facility City, State, Zip Code
Insert Facility Telephone Number (if applicable)



MISSOURI DEPARTMENT OF NATURAL RESOURCES
WATER PROTECTION PROGRAM
INDUSTRIAL STORMWATER PERMITS
STORMWATER POLLUTION PREVENTION PLAN TEMPLATE

Instructions

This Stormwater Pollution Prevention Plan (SWPPP) template is a resource to help regulated industrial stormwater facilities comply with the conditions found in the Missouri State Operating Permit (MSOP). This template may be utilized by facilities permitted under the authorization of a general or site specific MSOP. This template is not to be used by facilities operating under the Land Disturbance, MORA0000 permit.



Compliance Assistance



Voluntary AOC

- Highest flexibility in timeframes
- No upfront penalty
- Work directly with C&E on realistic milestones-tailored to your specific circumstances
- Expedited return to compliance
- Reduction in SNC
- Working together to be as protective of human health and environment as possible
- Establishes a durable, professional working relationship.
- A certain level of protection from federal orders or third-party lawsuits.



Enforcement

- It does not have to be scary
- Talk with us early and often
- We probably have a tool to assist you with achieving compliance
- Lets develop those strong professional working relationships
- We want to help you stay in compliance!!

QUESTIONS???

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