




Minnesota's solutions for dealing with difficult permittees

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A photograph of three King penguins on a sandy beach under a blue sky. The penguins are standing and facing each other. Overlaid on the image are three semi-transparent circles: a large dark blue one in the center, a green one in the top right, and a black one in the bottom right. Text is placed within these circles.

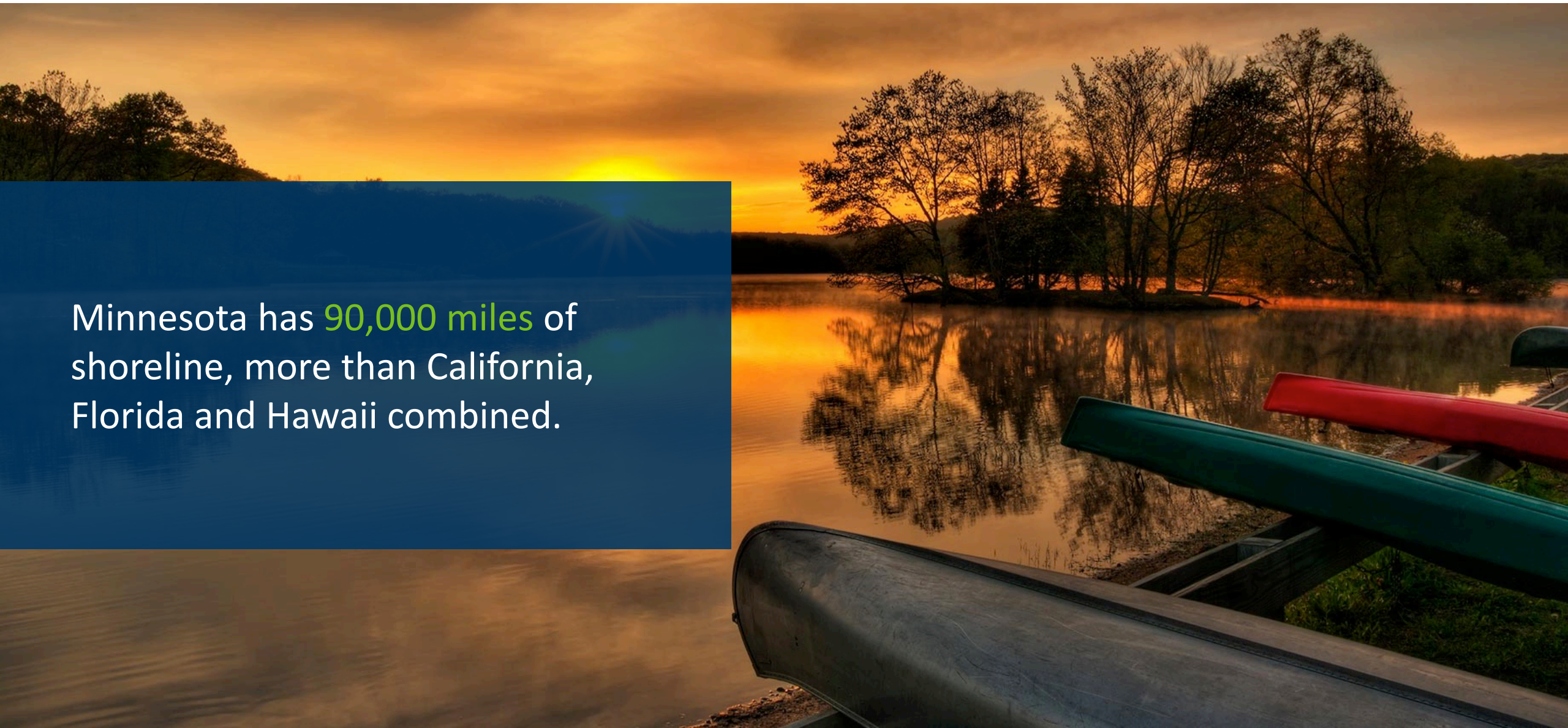
5 types of
difficult
permittees


3,495
permittees

Our
solutions.

Why do we care about water in Minnesota?

Minnesota has 90,000 miles of shoreline, more than California, Florida and Hawaii combined.





Most
permittees
comply.
Some do
not.



They have
their
reasons.

Find out
why.

Work with
them on
compliance.



1

Hand-
holders



Hand-holders

Need help filling out application,
developing SWPPP, getting trained.
Resource-intensive!

Hand-holders: solutions

- They're not alone. We developed web guidance to help these facilities.
- Provide them technical assistance and guidance. Go at their pace and work at their level.
- Take your time with these permittees. They care enough to want to comply.
- The trust you build with them means they'll likely call you for other regulation questions.



2

Does not
understand
regulations

A group of business professionals are gathered around a dark wooden conference table. In the foreground, a woman in a green shirt is gesturing with her hands while speaking. Behind her, a man in a blue and white striped shirt looks on attentively. To his right, another man in a blue shirt is smiling. In the background, a man in a blue shirt is looking down at a laptop. A hand holding a pen is visible on the right side of the table, writing on a notepad. A silver laptop is open in front of the woman in green. On the wall behind them is a whiteboard with a hand-drawn diagram showing a central star-like shape with arrows pointing outwards to various boxes and shapes.

They understand their business

But not the regulations. You have
to appeal to their business sense to
motivate them.


For permittees who don't understand regs: solutions

- Focus on shared goals: protecting our state's surface waters, drinking water sources.
- Take the time to help them understand the requirements.
- Help them understand cost-savings, or sustainability goals, or worker safety issues.
- Ask them how you can help them.



3

No follow-
through



No follow-through
They agree to comply but fail to follow through. Don't ignore them.

No follow-through: solutions

Consider a meeting instead of an inspection for known issues. Let them know carrot could be a stick.

Take your time with these permittees. They may want you to go away, but be persistent.

Don't let them off the hook. Remind them you haven't forgotten even if they have.

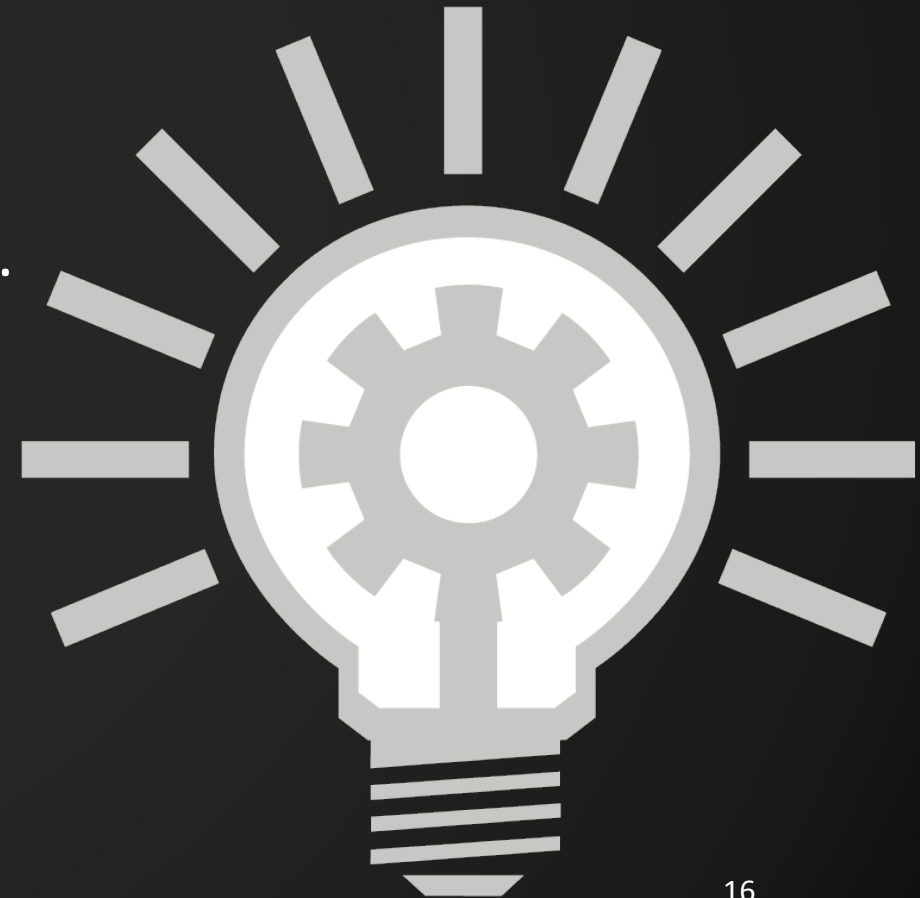


4

Violently
angry
permittees

Violently angry permittees: solutions

- Violent acts against regulators is NEVER okay.
- Contact your management and your legal staff.
- File a police report.
- Contact organization's legal staff or HR about issue.
- Leave facility if conducting an inspection.



Additional thoughts

While permittees do not love being regulated, they do not have the right to cause harm or insinuate causing harm to regulators.

Be careful how communication messages go out.

Have communication staff and/or management review them before sending them.

Take care of yourself but don't give up or let them "win".



5

Frustrated:
new regs
during
↓ economy



Frustrated permittees

They likely want to comply but have
valid barriers to successful
compliance. Here them out.

Frustrated permittees: solution

MN issued its first MSGP during the Great Recession (April 2010). Understandably, permittees were angry at new requirements in a bad economy. We listened, and created:

- SWPPP checklist & Template
- Sampling & BMP manuals
- Sector-specific guidance documents
- Sampling YouTube videos
- Quarterly newsletter



Do not give up on difficult permittees!

- Listen to them and to their concerns.
- Genuinely validate them
- Work with them to produce solutions and achieve resilient partnerships



Thank you!

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