



Permit Writer/TMDL Writer Coordination

Improving the Partnership

Angela Falls, Missouri Department of
Natural Resources

In this presentation:




- TMDLs and permits in Missouri
- Coordination issues in Missouri
- Steps Missouri is taking to address issues
- Group discussion

MISSOURI


POPULATED PLACES

- 100,000 – 499,999 • Kansas City
- 25,000 – 99,999 • Columbia
- 24,999 and less • Festus
- State capital ★ Jefferson City
- Urban areas ☀

TRANSPORTATION

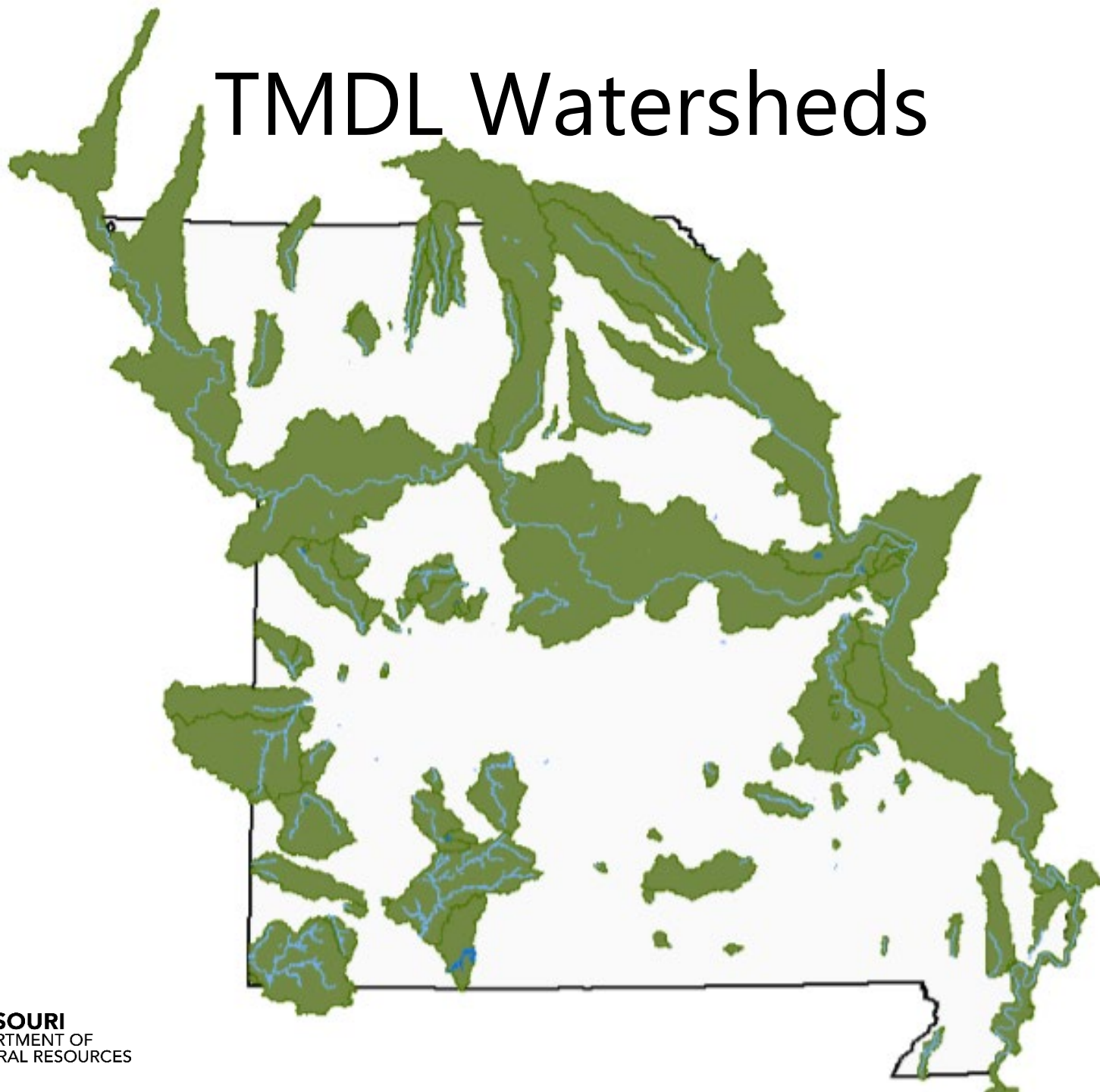
- Interstate; limited access highway 
- Other principal highway 
- Railroad 

PHYSICAL FEATURES

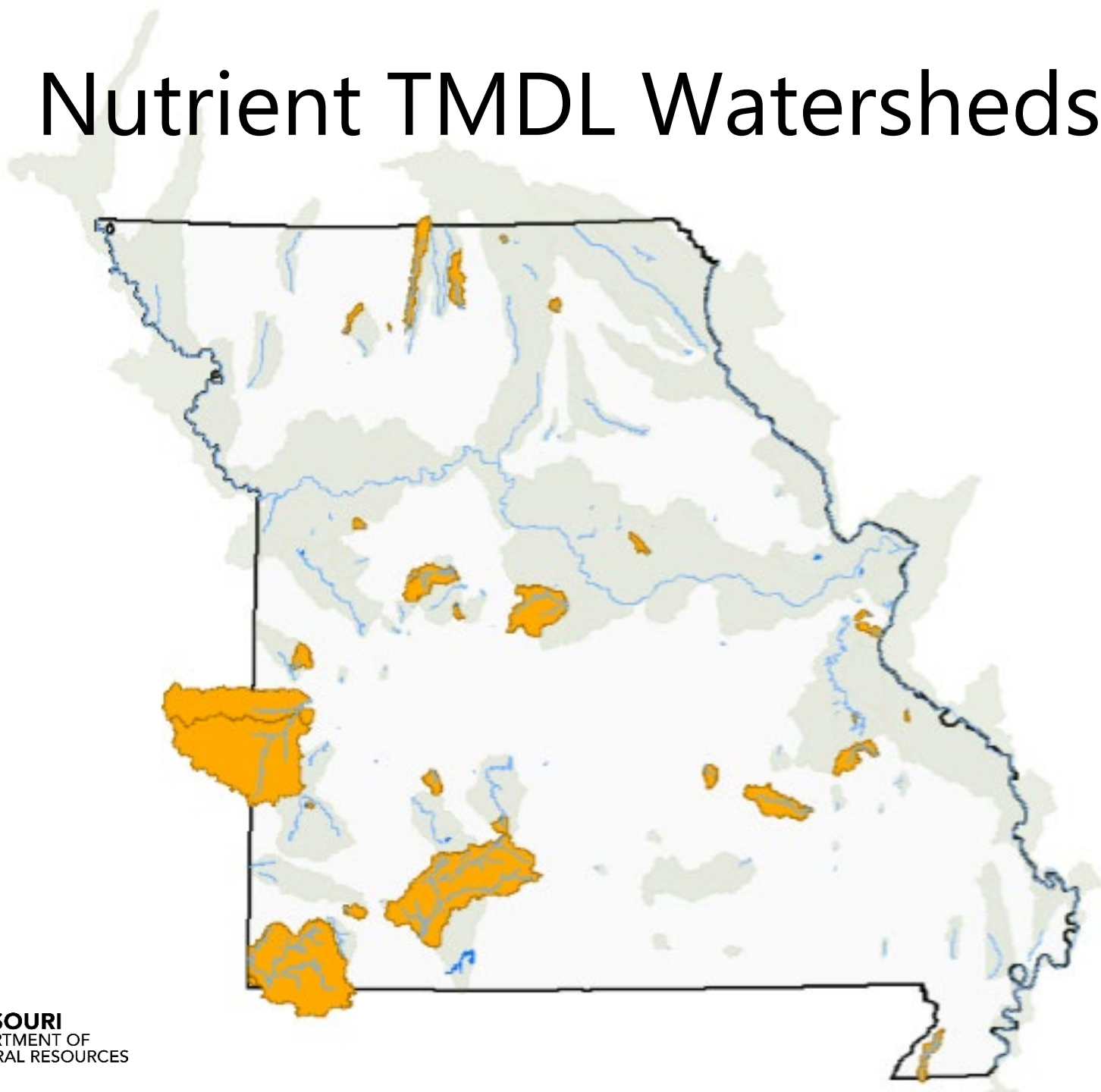
- Streams 
- Lakes 
- Highest elevation in state (feet) +1772
- The lowest elevation in Missouri is 230 feet above sea level (St. Francis River).



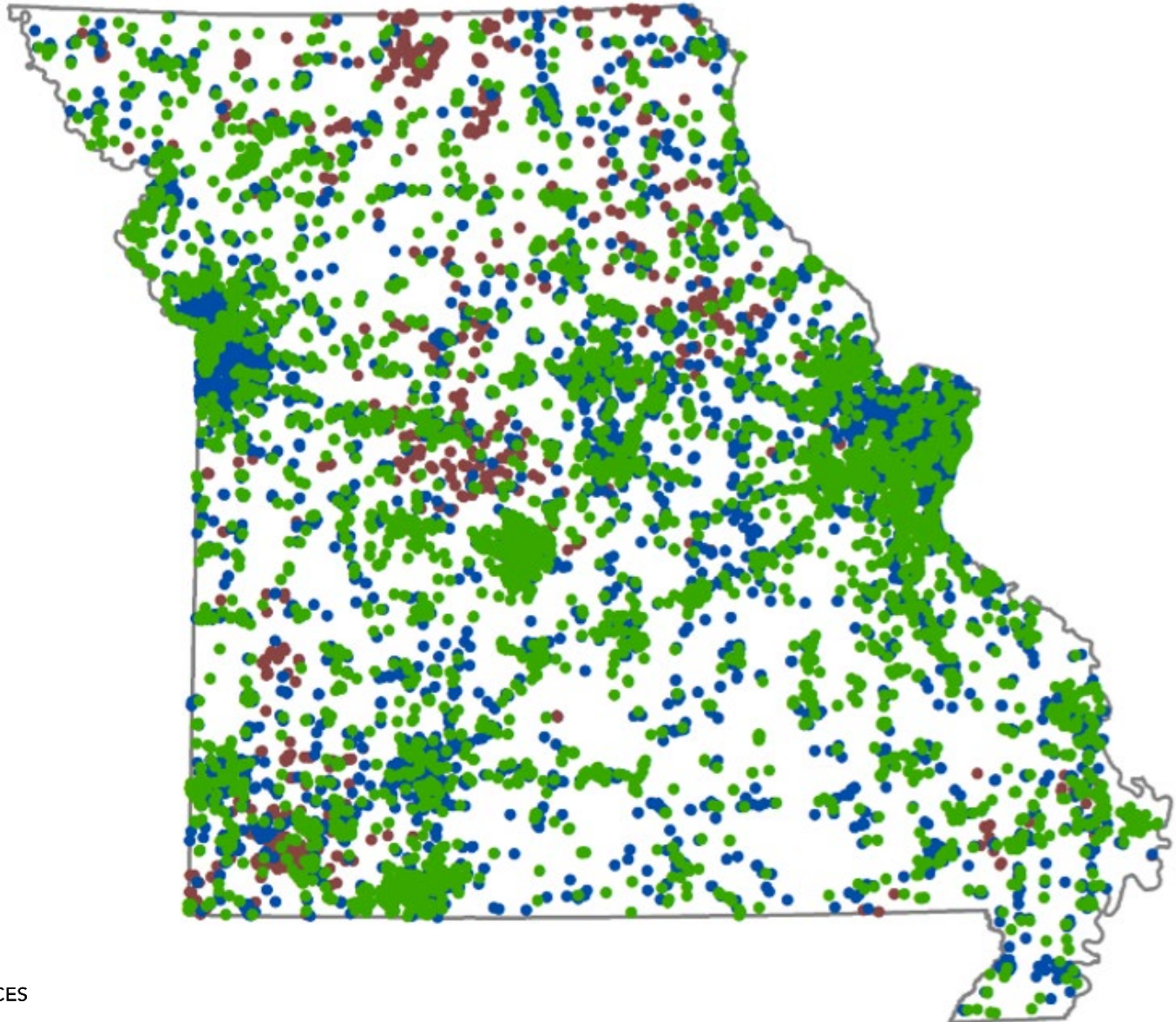
TMDL Watersheds



Nutrient TMDL Watersheds



Permitted Features



Clean Water

Operating Permits Section

Domestic
Unit

Industrial
Unit

MS4/401/
eDMR
Unit

Watershed Protection Section

WQS Unit

TMDL
and
Modeling
Unit

Monitoring
and
Assessment
Unit

Maybe there is a problem?

- Permits were getting placed on PN that didn't incorporate the TMDL, then needed a second PN when corrected
- Permits were getting issued that didn't incorporate the TMDL
- Permit writers didn't understand the TMDL
- Permit writers could not parse out the WLAs needed to calculate effluent limits, WLAs are not always explicitly stated in TMDLs

Lean Event

April 2016



E3: Enhancing Effectiveness and Efficiency

into Permit
limit derivation (B)
for drinking water intake.

of WLAs.
BMPs in place of too stringent WLAs.
technology for too stringent WLAs.

es-on-sites.
oping Periods in TMDL.
sources if TMDL is not developed.
(person)
and implement non-numerically.
TMDLs for any new information
as appropriate.
is for informing permit
their uses

EXTERNAL MESSAGING / KNOWLEDGE

- D1. Engineer will prepare for all pre-meetings and involve/invoke TMDL sheet when appropriate.
- D2. Include a TMDL/303d topic on Eng. Workshop Agenda / WPP Forum
- D3. Prepare & post TMDL implementation fact sheet - what does an applicant have to do.
- D4. Develop GIS products that characterize the spatial extent of TMDL/303d Implementation
- D5. Enhance Antides Implementation Procedure to see if TMDL listings can be improved.

EXTERNAL MESSAGING / KNOWLEDGE

D6. Education thru DMW of TMDL/303d Implementation + Anti-deg for New proposed Discharges

D7. Develop a defined template of water quality monitoring data that we provide to Anti-deg applicants

D8. Develop an FAQ that incorporates impaired waters information. anti-deg

D9. Designate no new discharge areas - map? on DNR site. (Tier 1 & 3) Pollutant specific

D10. PW discussed impaired waters with permittee during 15-day preview courtesy call.

PRIORITIZATION

E1. Review Higher Development Growth Areas During TMDL Development & Prioritization

E2. Explore ways that Engineer Section can assist with TMDL Development/Prioritization.

E3. Engineer Engineering & Permits will work with WQS to identify facilities that discharge to impaired waters (with no TMDL) to upgrade

E4. Allow permittees to conduct their own TMDL for facilities that discharge to 303(d) water

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TMDL
Unit

Prioritization of
watersheds, water
bodies, pollutants, etc.
for TMDL

High
Impact

A6

A1 A9

A2

D2

B10

D10

D7

D5

A7

D1

Low Difficulty
Low Impact

NAL MESSAGING / KNOWLEDGE

thru DMW

TO PREPARE THEIR
SUBMITTAL



MISSOURI
DEPARTMENT OF
NATURAL RESOURCES



SUPERSTICKY EASELAND
TABLEAU A FEUILLES ADHESIVES 3 PERFORANTES
SUPERPOUR ADHESIVES BLANCES DE NOUVEAU REPOSITIONNABLES



30

25 IN/PO x 30 IN/PO
63.5 cm x 76.2 cm
0.2 SQ FT/PP (0.48 m²)

#	Who	1st STEP	When
A6	Logan	Create Needs List	May
A4	Chris	Inform PW of role	May
B5	Mike	Write Implementation plan	May
B3	John H	Prioritize old TMDLs	2016
B4		Tie to #B3	
C8	John R	Draft new process	July
A2	Mike	Just Do It	May
D2	Refaat	Put on Agenda	2016
D1	John R	Meeting Invite	May
C6	Trish	Update after EPA review	July
D9	Leisue	Develops Map	July
D4		Tie to #D9	
D10	Angela	Write Procedure	May

B9

E6

E7

C5

A3

E5

E4

High Difficulty

FAQ document
limit derivation
w Manual

SLC Notice
draft
TMDL report

Prioritization of TMDLs
report response to public
commentary, final approval
from staff to submit to
EPA, submit final TMDL

Edits/responses
due to EPA
comments following
Submittal are typical

Update TMDL GIS
data + webpages, notify
staff EPA TMDL findings
draft through coordination
w/ ITSD GIS ITT-2016

Improvements after Lean Event

- GIS layer with TMDL watersheds
- Permit writer sets up meeting with TMDL staff prior to writing permit
- Permit writer sends draft permit to TMDL staff prior to public notice for review
- TMDL writers sends draft TMDLs to permit group for review
- Sources of information now being shared

Where are we now?

- TMDLs are being appropriately implemented in permits
- Meeting is not needed every time
- TMDL staff have reviewed 95 permits (2016)
- TMDLs are being written with more clear WLAs and implementation plans
- Still working through issues with new facilities and antidegradation

A side note...

Proximity and Coordination

Short-Term Permit Writer Project

- Reduce permit backlog
- Staff from all areas of the water program
- Crash course permit writer training
- Program staff visited other areas of the building and discussed permit issues with coworkers in other sections

Group Discussion

- Today we are going to work on identifying coordination problems, tomorrow we will discuss solutions.
- Problem-focused discussion:
 - Descriptions of the problem
 - Origin of the problem
 - The problem's impact
 - Staff's reactions to the problem

Group Discussion

Split up tables by: Permits and TMDLs

Discuss coordination challenges between permit writing and TMDL writing from your point of view.