



# **Stormwater-Wastewater Nexus: Compliance Planning to Avoid Enforcement**

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Presented by:

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# My Chores

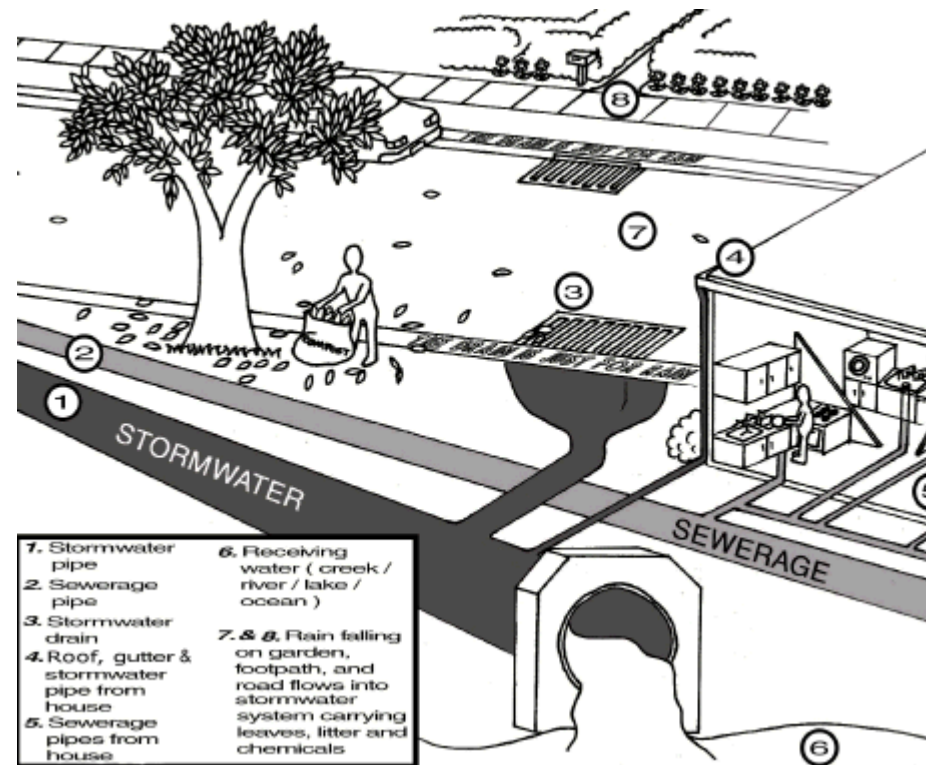
Duties	Sun	Mon	Tue	Wed	Thurs	Fri	Sat
Pull weeds							
Scrape old paint from fence							
Sweep room once toys picked up							
Mop the floors							



# My Chores

Duties	Sun	Mon	Tue	Wed	Thurs	Fri	Sat
Mow the yard							
Paint the Fence							
Clean up toys							
Vacuum Room							

# What is the Wastewater-Stormwater Nexus?



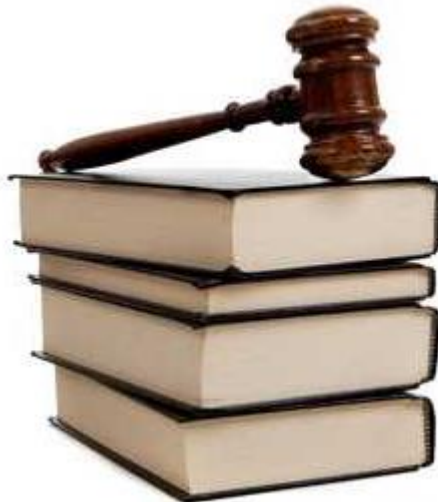
# Nexus and Goals



- Compliance (shared goal)
- Avoiding Enforcement
- Mitigating Enforcement Risks



# Enforcement Trends



# Enforcement Trends:

-MS4/CSO Consent Decrees



-2017-19 Enforcement Initiatives

**Enforcement Initiatives**

# The Nexus

- ❖ Systems not closed off



- ❖ Problem in one is a problem in other

- ❖ Duplicative services

  - ❖ Sampling Example.



# Permitting Trends in Stormwater

- ❖ Potential incorporation of other compliance programs
- ❖ Impact on MS4 by other programs
- ❖ Permit conditions versus SWMP



# Options

- ❖ Business as Usual?
- ❖ Integrated Planning
- ❖ Communication



# Avoiding and Mitigating Enforcement



- ❖ Plan ahead to not only *avoid* enforcement but mitigate effects of enforcement for both programs
- ❖ Ex: Overflow of sewer manhole by water quality pond
  - ❖ Both programs notified
  - ❖ Coordination on testing locations
  - ❖ Collaboration re reporting/mitigation
  - ❖ Communication on prevention



# Options

- ❖ Expect Compliance
- ❖ Anticipate robust inspection for Phase I and Phase II permittees
- ❖ Be ready for enforcement
- ❖ Develop a positive story/message for regulators
- ❖ Know narrative/tell your story



# Integrated Approach

- ❖ Work to avoid “silo” programs
  - ❖ Coordinate activities
  - ❖ Communicate on events/enforcement/compliance
  - ❖ Budget impacts
  - ❖ Integrated Planning
- ❖ Identify technology and tools available to maximize opportunities

## My Chores

Duties	Sun	Mon	Tue	Wed	Thurs	Fri	Sat
Pull weeds							
Scrape old paint from fence							
Sweep room once toys picked up							
Mop the floors							

## My Chores

Duties	Sun	Mon	Tue	Wed	Thurs	Fri	Sat
Mow the yard							
Paint the Fence							
Clean up toys							
Vacuum Room							



## Our Chores

Duties	Sun	Mon	Tue	Wed	Thurs	Fri	Sat
Pull weeds together before mowing yard.							
Scrape paint first before applying new coat of paint							
Coordinate toy pick up with sweeping to get whole floor							
Vacuum before mopping							



# Questions



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