



IMSWPAF

Mick Kuhns, Director, BL&WQ

MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION

Protecting Maine's Air, Land and Water

IMSWPAF

- Integrated Municipal Stormwater and Wastewater Planning Approach Framework.
- AKA the “IP” or the “Framework”
- <http://cfpub.epa.gov/npdes/integratedplans.cfm>
- Officially introduced June 5, 2012.
- Structured:
 - Overarching Principles
 - Guiding Principles
 - Three step Process



Integrating at the DEP

Recognized that point source and non-point source permitting programs needed to be under one roof.

Both programs deal with water quality issues and permitting, but weren't really coordinated.

Previously, MS4 program was lodged in the DWM and MPDES in the WQM.

Now both programs are within the WQM under one program manager.

What does IP do?

Supposed to “recognize flexibilities in the CWA for the appropriate sequencing and scheduling of work.”

Many obligations, not sufficient funding.

Be a rational way to meet CWA obligations.

Promotes a “when attainment is achieved” rather than an “if attainment is achieved”.

Overarching Principles

1. Maintain existing regulatory standards;
2. Address most pressing CWA issues first;
3. Municipality driven; and,
4. Innovation.



Guiding Principles

- Reflect state requirements and get state input on priority setting.
- Utilize existing flexibilities for meeting CWA obligations.
- Maximize fund effectiveness.
- Evaluate innovative/sustainable technologies.
- Evaluate and address community impacts.



Guiding Principles (Cont.)

- Compliance with existing technology-based/core requirements not delayed.
- Financial strategy in place.
- Stakeholder input process.



Three Step Process

- Step One – Define the Scope.
 - MS4? POTW? Sanitary sewer? CSOs?
 - Define how much of each area to include.



Three Step Process

- Step Two – Plan Elements.
 - Identify regulatory issues to be addressed (where you need to be).
 - Assess current status (where you are now).
 - Establish structure for stakeholder process.
 - Solutions and schedules (incl. gap analysis).
 - Develop ways to measure success (M&V).
 - Periodic plan review for changes/improvements.



Three Step Process

- Step Three – Plan Implementation.
 - Mechanism – Schedule of Compliance
 - Projects less than five years – Permit.
 - Longer Projects – Consent Agreement (Enforcement Actions).



EPA Comments

Deborah Nagle – Director, Water Permits HQ

- IP is voluntary.
- How can EPA help?
- EPA does not approve IPs.
- IPs are developed with the state authorities.
- Drinking water not a part of IP.
- States authorities do not have to automatically accept an IP.



EPA Comments

Mark Pollins – Director, Water Enforcement HQ

- Burden on communities to take the first step.
- EPA “is not in the approval mode” for IPs.
- Municipalities don’t have to do this.
- IPs are case by case.
- Rational way to meet CWA requirements.
- Not if, but when CWA requirements met.



EPA Comments

Curt Spaulding – Region I Administrator

- Stress innovation of solutions.
- Focusing on benefits, not pipes.
- Desire to make this work.





www.maine.gov/dep