

NEBRASKA



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DEPARTMENT OF TRANSPORTATION

NPDES Municipal Separate Storm Sewer System Stormwater Management Plan

UPDATED FOR YEAR 2024

PERMIT TERM: 2018-2022 (ADMINISTRATIVELY EXTENDED)

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MS4 PROGRAM SUPPLEMENTAL DOCUMENTS

PLAN DOCUMENT NAME	VERSION
PUBLIC EDUCATION AND OUTREACH STRATEGY <i>DETAILS OF THE NDOT PEO STRATEGY ARE INCORPORATED THROUGHOUT THE SWMP</i>	2024
CONSTRUCTION STORMWATER PLAN	2024
POST-CONSTRUCTION STORMWATER PLAN	2024
ILLICIT DISCHARGE DETECTION AND ELIMINATION PLAN	2024
GOOD HOUSEKEEPING AND POLLUTION PREVENTION PLAN	2024
NDOT MS4 REGULATED AREA MAPS	2024

Supplemental documents are reviewed annually, and updates to them are documented in the annual reports.

PROGRAMMATIC ABBREVIATIONS

AGC	Association of General Contractors
BMP	Best Management Practice
CSW	Construction Stormwater
CTAG	Compliance Technical Advisory Committee
DCE	District Construction Engineer
DDECM	Drainage Design and Erosion Control Manual
DE	District Engineer
DIRK	District Incident Reporting Knowledge
DOMM	District Operations and Maintenance Manager
FRCP	Facility Runoff Control Plan
GHPP	Good Housekeeping and Pollution Prevention
GIS	Geographic Information Systems
IDDE	Illicit Discharge Detection and Elimination
LTAP	Local Technical Assistance Program
MCM	Minimum Control Measures
MS4	Municipal Separate Storm Sewer System
NDEE	Nebraska Department of Environment and Energy
NDOT	Nebraska Department of Transportation
NPDES	National Pollutant Discharge Elimination System
O&M	Operations and Maintenance
PCSW	Post Construction Stormwater
PEO	Public Education and Outreach
RDC	Roadside Development and Compliance
STF	Stormwater Treatment Facility
SWMP	Stormwater Management Plan
SWPPP	Stormwater Pollution Prevention Plan
SWPPPTrack	Stormwater Pollution Prevention Plan Tracking System

MS4 PROGRAM ORGANIZATIONAL CHART

Implementation of the Stormwater Management Plan (SWMP) by Nebraska Department of Transportation (NDOT) involves a diverse group of stakeholders across multiple Divisions and Districts. The NDOT Director has assigned administrative oversight of the SWMP to the two Deputy Directors. Deputy Directors utilize various Managers to assign staff and resources to implement the program standards required by Nebraska Department of Environment and Energy (NDEE) and the Municipal Separate Storm Sewer System (MS4) Permit. This group of Division Managers and their key staff assist with implementation and communication of the adopted program standards. Each year, these staff members work with NDOT employees, consultants, contractors, vendors and the public to help reinforce and, when necessary, enforce the Best Management Practices (BMPs) represented in this SWMP.

See organization chart on next page.

NDOT Director

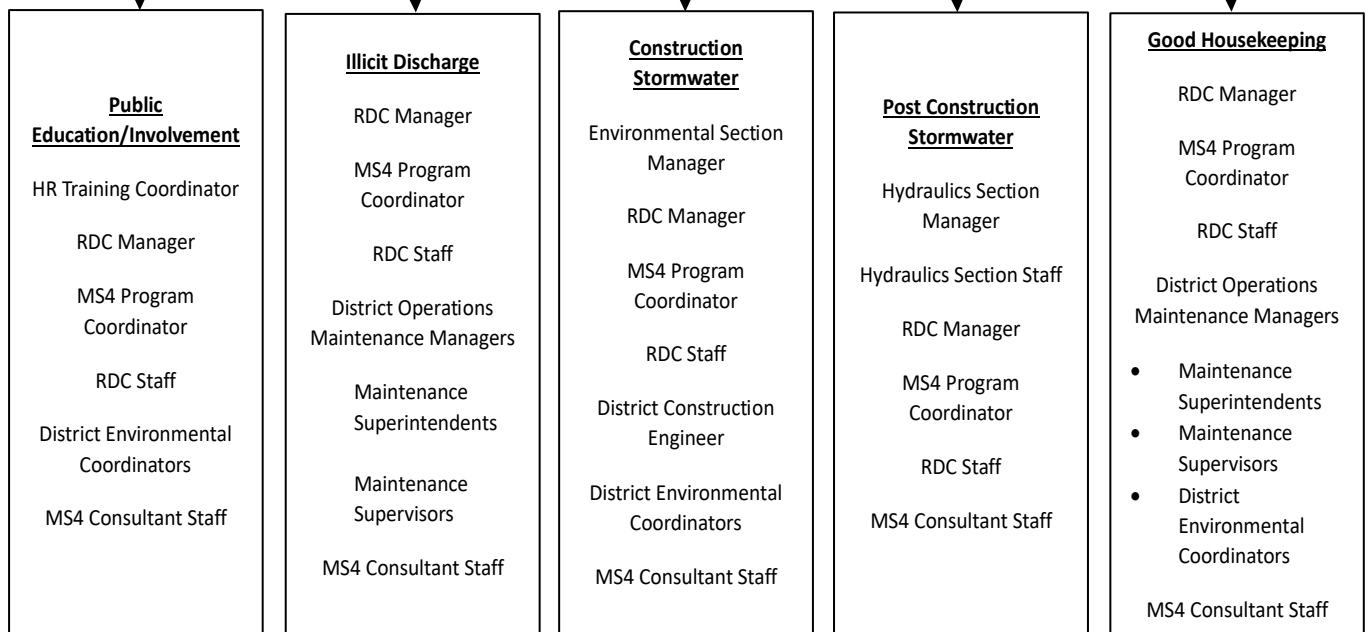
Deputy Director – Operations

- Operations Division Manager
- Construction Division Manager
- District Engineers
 - District Operations and Maintenance Managers
 - Facility Supervisors and Maintenance Staff
 - District Construction Engineers
 - Project Managers and Construction Staff
 - District Environmental Coordinators

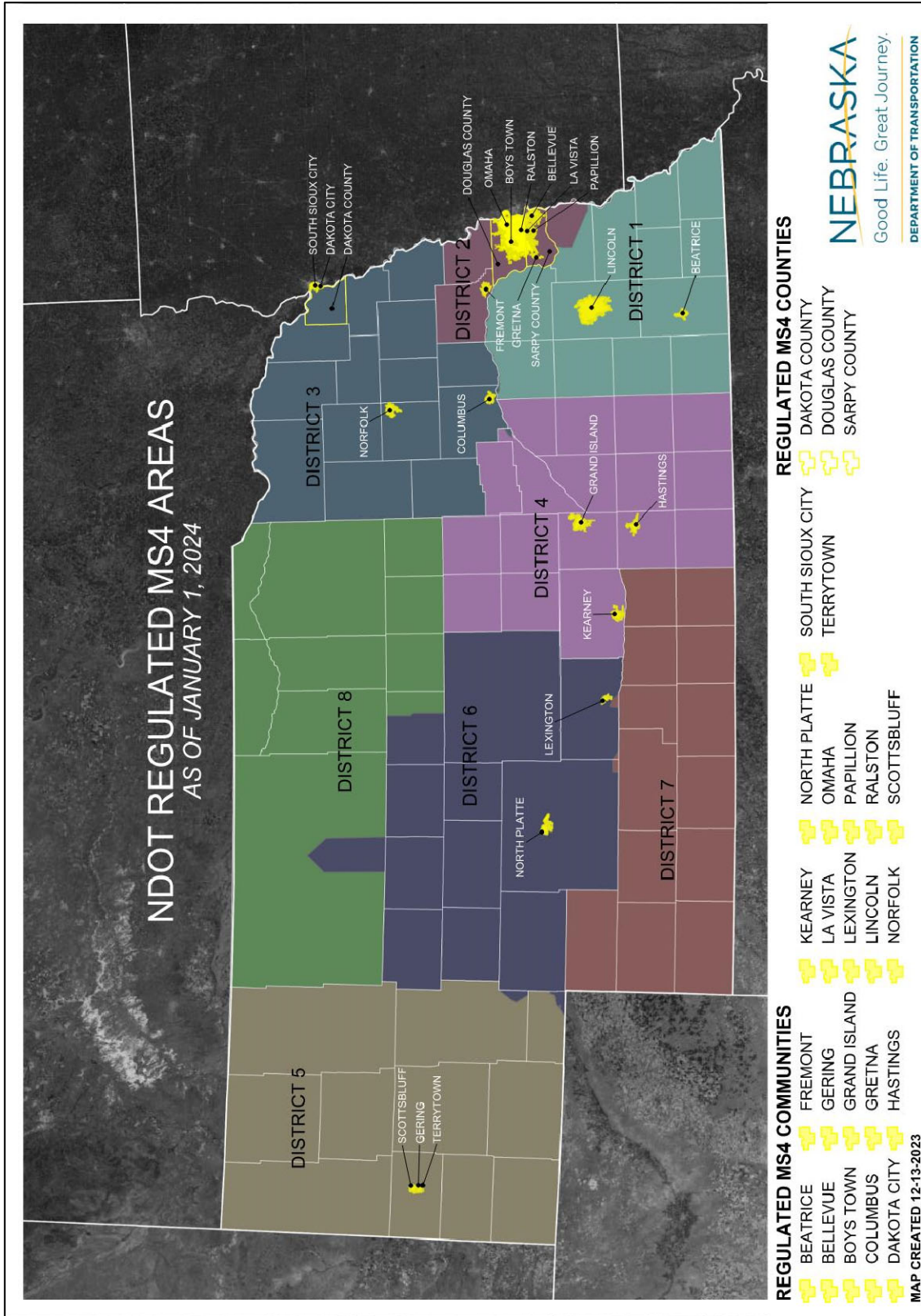
Deputy Director – Engineering

- Project Development Division Manager
 - Environmental Section Manager
 - Highway Environmental Programs Manager, Roadside Development and Compliance Unit
 - MS4 Program Coordinator
- Roadway Design Division Manager
 - Hydraulics Section Manager

MS4 Program Workgroups



STATE OF NEBRASKA REGULATED MS4 AREAS



STORMWATER MANAGEMENT PLAN DOCUMENT BACKGROUND

This Plan (SWMP) documents commitments made by NDOT to implement stormwater management procedures and practices. NDOT maintains compliance as required by a National Pollution Discharge Elimination System (NPDES) permit issued by NDEE. This Permit is issued to regulate the quality of stormwater runoff from within the regulated NDOT MS4 areas. The Federal Clean Water Act establishes the basis for permit conditions as well as the compliance requirements that NDEE enforces. The purpose of the permit is to minimize the risk of stormwater pollution in local receiving waters.

Procedures have been developed to comply with each of the six Minimum Control Measures (MCMs) stated in the permit. Each of the MCM procedures and activities is reviewed by the NDEE as part of the annual reporting process and are described as follows:

1. Public Education, Outreach, and Involvement: NDOT distributes educational materials and conducts training that describes impacts of stormwater discharges on water bodies and steps that the target audience can take to minimize pollution within stormwater discharges to local receiving streams. NDOT engages its target audience in the development and review of the SWMP. Public education, outreach and involvement supports NDOTs efforts to minimize the pollutants in stormwater runoff.
2. Illicit Discharge Detection and Elimination: NDOT has a program using enforceable statutes that support policies and procedures for identifying, enforcing, tracking, removing, and cleaning up illicit discharges within the storm sewer system. NDOT coordinates information with a variety of agencies and jurisdictions for responding to and resolving illicit discharges.
3. Construction Stormwater Management: NDOT implements and enforces a program with enforceable statutes to reduce pollutants in stormwater runoff from construction activities. Erosion and sediment control design, SWPPP maintenance, site inspections and contract administration procedures reduce the pollutants associated with disturbing soil during the construction process.
4. Post Construction Stormwater Management: NDOT implements and enforces a program using enforceable statutes that minimizes water quality impacts by requiring Stormwater Treatment Facilities (STFs) to be designed, constructed, and maintained on new and re-development projects.
5. Pollution Prevention/Good Housekeeping: NDOT implements an operation and maintenance program with policies and procedures that minimize the impacts of maintenance and highway facility operations associated with stormwater runoff.

This SWMP document satisfies the consolidated effort to address each MCM. The document includes a rationale statement for each MCM, description of each BMP, references to supporting documents, as well as the goals, frequencies, assignments, and evaluation and assessment criteria used by NDOT. The format of the document is consistent throughout and is written in a manner to satisfy specific wording of the NPDES permit. References and supporting documents are listed to clarify where the implementation and maintenance details for each BMP can be located.

Also, annual reporting to NDEE is a requirement of the MS4 Permit. The annual performance of each goal is measured against the evaluation and assessment metrics of each BMP to determine if the SWMP is effectively protecting water quality. This plan is updated each year and submitted to NDEE as the required annual report¹. Finally, this document is made available for the public to view. It is posted on the Department website and may also be requested through an NDOT public documents request.

¹Section 7.4 of the permit requires compliance with the Electronic Reporting Rule at 40 CFR Part 127. To date, the means to submit MS4 reporting information electronically is under development at NDEE and not available.

MCM BMP EVALUATION AND ASSESSMENT

BMPs are defined by a set of materials and efforts that NDOT maintains. SWMP tables define each BMP with descriptions, target audiences, messages, methods, and resources. The tables for defining activities follow the general format shown below:

BMP Title

Stormwater Management – BMP Implementation Activities			
BMP ID: ###	Regulatory Background:		
	BMP Rational:		
	Report:		
	References:		Frequency:

BMPs have a set of goals that NDOT implements. SWMP tables list the goals for the activity, a measure for evaluation and assessment as well as the reporting for annual performance that is compared against the evaluation and assessment targets. The tables for implementation activities follow the general format shown below:

BMP Title

Stormwater Management – Annual Report			
BMP ID: ###	BMP Strategy:		
	Reference:		
	Responsible Party:		Frequency:
Administration:			
Evaluation/Assessment:			
Annual Performance:			
Satisfied:	<input type="checkbox"/> Yes <input type="checkbox"/> No	Supplemental Notes:	

To evaluate and assess annual performance, NDOT uses this assessment to determine what BMPs meet the identified measurable goals, what performance needs further review, or if action is necessary to identify the cause, mitigation, and corrective measures for improvement.

The following evaluation framework is developed to provide an objective, consistent process for BMP assessment. This process is flexible to incorporate the annual variability of each goal, the significance of that variability, and the frequency in which deviations from the goals occur in a calendar year. There are two ways NDOT evaluates each BMP:

Yes/No Assessments

- BMPs that have goals not evaluated through completion percentage, such as updating website resources, can be evaluated as a determination of completion. These goals are assessed as being satisfied with a qualitative “Yes/No” assessment for that reporting year. A “No” assessment will include information as to how the goal will be achieved in the next year.
If the same goal is not achieved in two or more consecutive years, the NDOT will assess and evaluate corrective actions needed to achieve BMP measurable goal compliance.

Tiered Assessment

- Within each BMP, specific, quantitative goals are evaluated through completion percentages are assessed based on a tiered completion percentage range. This accounts for annual variability and characterizes the significance based on the volume of work and the frequency of deviation. This flexibility determines the effectiveness representative of each BMP based on the collected metrics. Evaluating each BMP independently using representative tiering criteria allows NDOT to accurately evaluate the effectiveness of each one. The tiered criteria used for each goal is provided in the body of the plan. Below are two **examples** found in the report of how the process is structured and applied:

Tiered Assessment Criteria:
90 – 100% Completion = Meets goal
80 – 89% Completion = Needs further review
< 80% = Requires corrective action

Tiered Assessment Criteria:
95 – 100% Completion = Meets goal
85 – 94% Completion = Needs further review
< 85% = Requires corrective action

- Meets goal means the particular activity within the BMP has been satisfied.
- Needs further review means to assess the frequency and significance and possible corrective action may be required if:
 - A single annual occurrence is not considered significant when occurring in two or less of five annual periods. The BMP may still be considered effective and meet the goal.
 - When annual performance stays consistent within this range for three or more consecutive years, the NDOT will identify the corrective action for the BMP.
 - The cause resulting from three consecutive years of needing review shall be determined and corrective action implemented or revision of the goal to reflect these conditions. The revised goal shall be considered the maximum extent practicable (MEP) for the respective administration.
- Requires Corrective Action means that when an annual documented performance is below the ‘Needs further review’ criteria, indicates the specific activity for the BMP is not being implemented effectively as described in the plan. NDOT will identify the cause, mitigation, and corrective action for meeting the activity goal. The corrective action will be described in the ‘Annual Performance’ section of the annual report and implemented in the following calendar year.

MCM #1&2 PUBLIC EDUCATION, OUTREACH, AND INVOLVEMENT (PERMIT SECTION 3.4.1)

Public Education, Outreach, and Involvement Decision Process and Rationale

The purpose of this MCM is to educate the target audience on the benefits of keeping pollutants out of stormwater runoff that discharge to receiving waters. An informed target audience can make a reduction in the amount of stormwater pollutants that enter our stormwater systems. NDOT utilizes various methods to communicate these strategies, called Best Management Practices (BMPs) and focuses communication on the target audiences that implement BMPs. The internal target audience represents those involved in the development, review, and implementation of BMPs listed in the SWMP. The external target audience represents individuals and groups that do not implement this SWMP but can affect stormwater quality or share information with NDOT about stormwater runoff from highways and maintenance facilities.

This MS4 **Public Education and Outreach (PEO) Strategy** is a targeted approach toward delivering stormwater education, training, and public involvement to groups of individuals that may influence stormwater quality associated with state highway and maintenance facility runoff. By focusing on the target audiences described in this PEO Strategy, NDOT can best develop awareness of stormwater BMPs, increase knowledge about recommended and required BMPs, and develop skills for properly implementing, operating, and maintaining BMPs.

MS4 Permit Part 3.4.1.1.1 requires NDOT to define the goals and objectives of the program. NDOT has defined the following **PEO Strategy Goals**:

PEO Strategy Goal 1: Educate and train the target audience to follow recommended and required BMPs; and the steps the target audience can take to reduce stormwater pollution.

PEO Strategy Goal 2: Utilize a combination of NDOT appropriate strategies to reach target audiences that can implement stormwater BMPs.

PEO Strategy Goal 3: Inform the target audience about how to participate in environmental stewardship opportunities, review the SWMP, and report illicit discharges.

PEO Strategy BMPs: The PEO Strategy Goals are supported by the PEO Strategy BMPs described throughout the SWMP. The following PEO Strategy BMPs provide details about how NDOT accomplishes PEO Strategy Goals.

BMP 1 Deliver stormwater education materials that are tailored, current and relevant to the SWMP.

BMP 2 Deliver stormwater training and events that are tailored, current and relevant to support BMP implementation, operation, and maintenance.

BMP 3 Maintain public review, comment and input resources that support program BMP goals and objectives.

BMP 4 Support public notification from the target audience about the SWMP and pollution problems impacting stormwater quality.

The following outreach and education BMPs are incorporated into the subsequent MCMs based on their applicable content:

MCM 3, BMP 4 Deliver education about the impact of illicit discharges, common types of illicit discharges, and response procedures when illicit discharges are identified.

MCM 4 BMP 4 Deliver education about the impact of construction-related stormwater pollution, construction site erosion control, sediment control, good housekeeping practices, inspection, and enforcement requirements.

MCM 5, BMP 2 Deliver education about planning and designing BMPs required to treat stormwater runoff from new and redevelopment projects.

MCM 6, BMP 3 Deliver education about the impact of highway and maintenance facility operation on stormwater quality, operation BMPs, and inspection and enforcement requirements.

PEO Strategy Target Audiences: The quality of stormwater discharging to the state highway, storm drain system can be impacted by audiences that NDOT addresses. Education materials and outreach activities are tailored with each target audience in mind to effectively reduce the risk of stormwater pollution. Educating the target audience is expected to have a positive impact on stormwater quality by reducing the risk of discharging target pollutants into receiving waters.

The Primary Target Audience is characterized by a high level of responsiveness to NDOT. This group includes any individual or entity that NDOT places expectations upon with a high degree of confidence that those expectations will be met. The Primary Target Audiences include:

- NDOT Staff:
 - o See MS4 Program Organizational Chart
- Construction Industry Partners:
 - o Association of General Contractors
 - o Construction project contractors
- Consultant Partners:
 - o Consultant Designers
 - o Consultant Project Managers/Inspectors

The Secondary Target Audience is characterized by a lower level of responsiveness to NDOT. The group includes any individual or entity that uses the state highway system or that can contribute stormwater and pollutants to the storm drain system from outside the NDOT right-of-way. NDOT has very little leverage over this group and places a lower degree of confidence associated with expectations placed on this group will be met without reinforcement or enforcement from other entities. The Secondary Target Audience only includes the general public.

MCM 1&2

BMP 1: Public Review, Comment and Input Resources

Stormwater Management – BMP Implementation Activities				
BMP ID: 1.1.1	Regulatory Background:	Coordinate Public Education and Outreach strategies with stormwater education or outreach materials for distribution to target audiences (Permit Section 3.4.1).		
	BMP Rationale:	To increase target audience awareness and knowledge of stormwater pollution and best practices to protect water quality.		
	Report:	Observations, recommendations, and/or changes made to program references during permit year.		
	References:	PEO Strategies listed below (Additional Public Education and Outreach strategies listed in BMP 3.4.1, 4.4.1, 5.2.1, 6.3.1)	Frequency:	Review Annually
Description of Activities	Target Audience	Messages	Methods/Resources	
Website	General Public and all NDOT staff	Stormwater Program Information, Guidance Documents and Links	NDOT Website – Digital program summary, contact information, downloads and links.	
Social Media	General Public	Basic Stormwater Awareness and Reporting	Twitter @NebraskaDOT	

BMP 1: Public Review, Comment and Input Resources

Stormwater Management – Annual Report				
BMP ID: 1.1.2	PEO Strategy:	Distribute stormwater education or outreach materials related to the impact of stormwater discharges on water bodies and steps that the target audience can take to reduce pollutants in stormwater runoff.		
	Reference:	MS4 Program File		
	Responsible Party:	RDC Unit	Frequency:	On-Going Annually
Administration: NDOT's Stormwater Management Website content includes the following program information: <ul style="list-style-type: none"> • IDDE Program • Construction Stormwater Program • Post Construction Stormwater Program • Good Housekeeping and Pollution Prevention Program 				
Evaluation/Assessment: Material is current				
Annual Performance:				
Effectiveness: Stormwater message is shared on social media once per year and can be viewed by the general public.				
Evaluation/Assessment: One message per year for all NDOT X (formally Twitter) followers				
Annual Performance:				
Satisfied:	<input type="checkbox"/> Yes <input type="checkbox"/> No	Supplemental Notes:		

BMP 2: Stormwater Training and Events

Plan Note: All training and events are documented in the MCM specific tables where PEO Strategies are referenced. See MCM 3.4, 4.4, 5.2 and 6.3 respectively for details about stormwater training and events.

BMP 3: Public Review, Comment and Input Resources

Stormwater Management – BMP Implementation Activities				
BMP ID: 1.3.1	Regulatory Background:	Provide stormwater public involvement for planning and implementation of programs and activities related to the development and implementation of the SWMP (Permit Section 3.4.1).		
	BMP Rationale:	Engage the Target Audience in a process to review programmatic changes that may affect agency operations and document considerations and changes made.		
	Report:	Observations, recommendations, and/or changes made to program references during permit year.		
	References:	PEO Strategies listed below	Frequency:	Review Annually
Description of Activities	Target Audience	Messages	Methods/Resources	
MS4 Administration Meeting	NDOT Director and Deputy Directors	MS4 Program Status and Updates	Meeting with Directors	
MS4 Workgroup Meetings	See MS4 Program Organization Chart for Program Leads	MS4 Program Implementation and Updates	MS4 Workgroup Meetings or Updates	
DCE Meetings	NDOT District Construction Engineers	MS4 Program Status and Updates	Meeting with District Construction Engineers	
DOMM Meetings	District Operations and Maintenance Managers	MS4 Program Status and Updates	Meeting with District Operations and Maintenance Managers	
DEC Meeting	District Environmental Coordinators	MS4 Program Status and Updates	Meeting with District Environmental Coordinators	
AGC Meetings	Association of General Contractors (AGC)	Construction Stormwater Policies and Specifications	Coordination and knowledge-sharing between Association of General Contractors representatives and NDOT Roadside Development and Compliance (RDC) Unit staff	
Project Public Meetings	General Public	Public Input on Department Projects	Public Meetings for Construction Projects within MS4	

BMP 3: Public Review, Comment and Input Resources

Stormwater Management – Annual Report				
BMP ID: 1.3.2	PEO Strategy:	Provide public involvement and participation opportunities that demonstrate compliance with state and local public notice requirements and involves the public in planning and implementation of programs and activities of the SWMP.		
	Reference:	NDOT Project Files, MS4 Program File		
	Responsible Party:	RDC Unit	Frequency:	On-Going Annually
Administration: NDOT's Stormwater Management Website content includes the following program information: <ul style="list-style-type: none"> • Current NPDES MS4 Permit • Current SWMP Document • Most recent three years of Annual Reports 				
Evaluation/Assessment: Material is current				
Annual Performance:				
Administration: Coordinate public input meetings for projects located within the regulated MS4 areas to present information and to solicit and support comments from the public.				
Evaluation/Assessment: Meetings are provided				
Annual Performance:				
Effectiveness: Coordinate meetings to present SWMP information and encourage feedback from the Target Audience including: <ul style="list-style-type: none"> • MS4 Administration – Annually • MS4 Workgroups – Annually for each workgroup area. • District Engineers and District Construction Engineers – Annually • District Engineers and District Operations and Maintenance Managers – Annually • District Environmental Coordinator Meeting – Annually • Association of General Contractors Meeting – Annually 				
Evaluation/Assessment: Annually				
Annual Performance:				
Satisfied:	<input type="checkbox"/> Yes <input type="checkbox"/> No	Supplemental Notes:		

BMP 4: Public Notification Recourses

Stormwater Management – BMP Implementation Activities			
BMP ID: 1.4.1	Regulatory Background:	Promote public reporting resources that allow the Target Audience to provide feedback about educational efforts, policies, projects and to submit details about pollution problems impacting stormwater quality such as illicit discharges (Permit Section 3.4.2).	
	BMP Rationale:	Equip the target audience with tools to submit information about stormwater pollution and efforts to protect stormwater quality so NDOT can take appropriate actions to protect water resources.	
	Report:	Observations, recommendations, and/or changes made to program references during permit year.	
	References:	PEO Strategies listed below	Frequency:
Description of Activities	Target Audience	Messages	Methods/Resources
Web Form	General Public	General Public for pollution-related activities or incidents.	NDOT public website: Report Highway Environmental Concerns (new roads.nebraska.gov/contact-us/)
General Phone Numbers	General Public	Contact information for General Public for pollution-related activities or incidents.	NDOT public General phone number (402-471-4567), fax number (402-479-4325) and TDD for hearing impaired (402-479-3834)
General Public Spill Reporting Numbers	General Public	Contact information for General Public for pollution-related activities or incidents.	NDEE Spill reporting hotline phone number (402-471-2186) or (877-253-2603)
Emergency After Hours Reporting Phone Numbers	General Public	Contact information for General Public for pollution-related activities or incidents.	Emergency Concern external contact links: 911, State Patrol 24-Hour Dispatch (402-479-4921)

BMP 4: Public Notification Recourses

Stormwater Management – Annual Report				
BMP ID: 1.4.2	PEO Strategy:	Record stormwater management public input and requests for information submitted by the public.		
	Reference:	MS4 Program File		
	Responsible Party:	RDC Unit	Frequency:	On-Going Annually
Administration:				
Website and telephone resources are maintained throughout the year for access and use by the public.				
Evaluation/Assessment:				
Resources are current				
Annual Performance:				
Effectiveness:				
A record of all formal stormwater management input provided by the public is documented.				
Evaluation/Assessment:		Tiered Assessment Criteria:		
100%		90 – 100% Completion = Meets goal 80 – 89% Completion = Needs further review < 80% = Requires corrective action		
Annual Performance:				
Effectiveness:				
All formal stormwater records submitted by the public that require an NDOT response include the date of contact and response provided.				
Evaluation/Assessment:		Tiered Assessment Criteria:		
100%		90 – 100% Completion = Meets goal 80 – 89% Completion = Needs further review < 80% = Requires corrective action		
Annual Performance:				
Satisfied:	<input type="checkbox"/> Yes <input type="checkbox"/> No	Supplemental Notes:		

MCM #3 ILLICIT DISCHARGE DETECTION AND ELIMINATION (PERMIT SECTION (3.4.2))

Illicit Discharge Detection and Elimination Decision Process and Rationale

The purpose of this MCM is to minimize the impact of illicit discharges to receiving waters within the MS4 area. An IDDE Plan is maintained by NDOT and is supported by state statutes² to ensure identified illicit discharges are removed. Dry weather inspections of MS4 outfalls are performed to look for evidence of illicit discharges. A storm sewer system map is maintained that identifies the geographic location of all NDOTs MS4 Outfalls and location of State-designated waters that receive discharges from MS4 outfalls. Finally, NDOT implements training strategies that equip staff to recognize, report and respond appropriately to illicit discharges.

Spills along the travelled highway surface and in the rights-of-way are the most common type of illicit discharge that NDOT experiences. Because a spill's timing, material, and severity of impact on a transportation corridor is difficult to predict, planning for a consistent response can be problematic. NDOT is typically not the first responder or the primary point of contact for these types of events. In some circumstances, NDOT is not involved in the emergency response except to document the incident was resolved. NDOT's basic involvement is limited to calling in the incident, recording the incident, providing traffic control as requested, and collecting information to ensure the spill is cleaned up and NDOT costs are recovered. NDOT works with State agencies such as NDEE and the State Patrol, who have jurisdictional responsibility to respond to spills along the state highway system. Local emergency responders are commonly involved when a situation warrants. This coordination is primarily completed not only to protect the safety of the traveling public, but also helps address the need to respond to and remove spills that may impact stormwater quality.

Other types of illicit discharges may occur, such as illegal dumping or unpermitted flows through stormwater conveyances. Illegal dumping is not common due to the nature of controlled access along state highways. NDOT staff are trained to look for evidence of illegal dumping and have it removed in a timely manner as they maintain the travelled surfaces and rights-of-way on an on-going basis. Finally, illicit discharges from permitted or unpermitted storm drain connections can occur. NDOT maintains adequate statutory control over the storm drain system within their regulated MS4 areas. These types of illicit discharges can be traced and reported back to an adjacent jurisdiction for investigation and removal within their authority.

The land use context and operational procedures of state highway drainage system minimizes difficulties with tracing the source of an illicit discharge. As described above, the discharge is either a spill with a responsible party, an illegal dumping incident, or an illicit discharge from a connection to state right of way. The linear drainage system allows NDOT to quickly locate where the illicit discharge has entered the MS4 area once it has been identified.

Spills that occur on state highways are emergency situations. Removing the spill and returning the highway to its desired operational condition is required of the responsible party by statute. If a responsible party cannot be identified from a spill or illegal dumping site, NDOT staff can lead in coordinating the removal of the substance. Illicit discharges from connections originate from and require coordination with an adjacent jurisdiction. The adjacent jurisdiction leads the removal of the discharge and notifies NDOT when it is resolved.

Evaluation and assessment of the IDDE Program is described in the BMP tables for this MCM below. Each goal is established with an evaluation and assessment target. By reaching the target, NDOT is protecting

² Nebraska Revised Statutes §39-310, §39-311, §39-1360, §39-1361

stormwater quality to the maximum extent practicable. The following BMPs are established in support of the IDDE Program.

BMP 1 Conduct periodic dry weather screening of MS4 Outfall locations to look for evidence of potential illicit discharges.

BMP 2 Maintain investigation, removal, and enforcement procedures to respond to illicit discharges effectively.

BMP 3 Maintain current maps of all MS4 Outfalls and State-designated receiving waters located within NDOTs MS4 areas.

BMP 4 Deliver education about the impact of illicit discharges, common types of illicit discharges, and response procedures when illicit discharges are identified.

MCM 3

BMP 1: Dry Weather Screening

Stormwater Management – BMP Implementation Activities			
BMP ID: 3.1.1	Regulatory Background:	Maintain dry weather screening and data collection procedures and information for the Illicit Discharge Detection and Elimination (IDDE) Program (Permit Section 3.4.2.1).	
	BMP Rationale:	Assign available resources to conduct outfall Dry Weather Screening activities.	
	Report:	Observations, recommendations, and/or changes made to program references during permit year.	
	References:	IDDE Plan	Frequency:

BMP 1: Dry Weather Screening

Stormwater Management – Annual Report			
BMP ID: 3.1.2	BMP Strategy:	Conduct dry weather screening and record all results in the NDOT Outfall Geodatabase.	
	Reference:	NDOT Outfall Geodatabase	
	Responsible Party:	RDC Unit	Frequency:
Administration: Input all dry weather screening records collected for the MS4 outfall locations into the NDOT Outfall Geodatabase within the current permit year.			
Evaluation/Assessment: Records entered vs. outfalls screened		Tiered Assessment Criteria: 90 – 100% Completion = Meets goal 80 – 89% Completion = Needs further review < 80% = Requires corrective action	
Annual Performance:			
Effectiveness: All MS4 outfall dry weather screenings are completed at least once during the current permit year.			
Evaluation/Assessment: NDOT MS4 Outfalls screened vs. Total number of NDOT MS4 outfalls		Tiered Assessment Criteria: 90 – 100% Completion = Meets goal 80 – 89% Completion = Needs further review < 80% = Requires corrective action	
Annual Performance:			
Satisfied:	<input type="checkbox"/> Yes <input type="checkbox"/> No	Supplemental Notes:	

BMP 2: Illicit Discharge Investigation and Removal

Stormwater Management – BMP Implementation Activities				
BMP ID: 3.2.1	Regulatory Background:	Maintain investigations, removal and enforcement procedures for the NDOT MS4 Illicit Discharge Detection and Elimination (IDDE) Program (Permit Section 3.4.2.1).		
	BMP Rationale:	Investigate illicit discharges identified so action can be taken by the responsible party to remove and/or clean up.		
	Report:	Observations, recommendations, and/or changes made to program references during permit year.		
	References:	IDDE Plan	Frequency:	Review Annually

BMP 2: Illicit Discharge Investigation and Removal

Stormwater Management – Annual Report				
BMP ID: 3.2.2	BMP Strategy:	Investigate and eliminate illicit discharges within and into the MS4 Area operated by NDOT.		
	Reference:	DIRK Reporting System		
	Responsible Party:	RDC Unit	Frequency:	On-Going Annually
Administration: Record dates of all notifications, stakeholders involved, investigation and communication efforts, status and final resolution taken for illicit discharges.				
Evaluation/Assessment: Recorded number				
Annual Performance:				
Administration: Map location of all documented illegal dumping and unpermitted connections identified during the permit year.				
Evaluation/Assessment: Recorded number				
Annual Performance:				

Effectiveness:

Within 48 hours of notification of all confirmed illicit discharges, initiate investigation and/or notify adjacent MS4 operator if necessary to trace and remove source.

Evaluation/Assessment:

Initiated investigations with 48 hours of detection/notification vs. number of notifications

Tiered Assessment Criteria:

90 – 100% Completion = Meets goal
 80 – 89% Completion = Needs further review
 < 80% = Requires corrective action

Annual Performance:

Effectiveness:

Complete follow up inspections of all illegal dumping and unpermitted connections (potential for recurrence) within one year of resolving the occurrence.

Evaluation/Assessment:

Completed follow-ups vs. number of investigations

Tiered Assessment Criteria:

90 – 100% Completion = Meets goal
 80 – 89% Completion = Needs further review
 < 80% = Requires corrective action

Annual Performance:

Effectiveness:

Summarize all instances closed without resolution including why the occurrence could not be resolved.

Evaluation/Assessment:

Number of summaries vs. unresolved instances

Tiered Assessment Criteria:

90 – 100% Completion = Meets goal
 80 – 89% Completion = Needs further review
 < 80% = Requires corrective action

Annual Performance:

Satisfied:	<input type="checkbox"/> Yes <input type="checkbox"/> No	Supplemental Notes:	
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BMP 3: Storm Sewer System Mapping

Stormwater Management – BMP Implementation Activities				
BMP ID: 3.3.1	Regulatory Background:	Maintain NDOT operated MS4 Outfalls maps and references for NDOTs MS4 Illicit Discharge Detection and Elimination (IDDE) Program (Permit Section 3.4.2.1).		
	BMP Rationale:	Facilitate geographic information needed for dry weather inspection locations, investigation of sources of pollution identified and reported, and protection of downstream receiving waters.		
	Report:	Observations, recommendations, and/or changes made to program references during permit year.		
	References:	IDDE Plan	Frequency:	Review Annually

BMP 3: Storm Sewer System Mapping

Stormwater Management – Annual Report				
BMP ID: 3.3.2	BMP Strategy:	Maintain maps with current geographic locations of all NDOT operated MS4 Outfalls and state-designated waters within the MS4 Area.		
	Reference:	NDOT-Outfall Geodatabase, NDOT operated MS4 Outfall Maps		
	Responsible Party:	RDC Unit	Frequency:	On-Going Annually
Administration: Maintain NDOT operated MS4 outfall attributes in the NDOT Outfall Geodatabase.				
Evaluation/Assessment: NDOT operated MS4 outfalls are current				
Annual Performance:				
Administration: NDOT operated MS4 outfall maps include the location of all state-designated waters receiving direct discharges from NDOT operated MS4 outfalls.				
Evaluation/Assessment: NDOT Outfall Geodatabase State-Designated Waters shapefiles are current				
Annual Performance:				

Effectiveness:

All existing NDOT operated MS4 outfalls with modified characteristics are updated in the NDOT Outfall Geodatabase annually.

Evaluation/Assessment:

Number of outfalls with modified characteristics vs. number updated.

Tiered Assessment Criteria:

90 – 100% Completion = Meets goal
 80 – 89% Completion = Needs further review
 < 80% = Requires corrective action

Annual Performance:

Effectiveness:

New and modified NDOT operated MS4 outfall locations are field verified within one year of any changes to the MS4 Regulated Area.

Evaluation/Assessment:

Number of outfalls with modified characteristics vs. number field verified

Tiered Assessment Criteria:

90 – 100% Completion = Meets goal
 80 – 89% Completion = Needs further review
 < 80% = Requires corrective action

Annual Performance:

Satisfied:	<input type="checkbox"/> Yes <input type="checkbox"/> No	Supplemental Notes:	
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BMP 4: IDDE Education and Training

Stormwater Management – BMP Implementation Activities				
BMP ID: 3.4.1	Regulatory Background:	Maintain IDDE educational and training information with public education and outreach strategies. (Permit Section 3.4.2.3).		
	BMP Rationale:	Distribute information that promotes the processes of recognizing, responding to and documenting illicit discharges.		
	Report:	Observations, recommendations, and/or changes made to program references during permit year.		
	References:	IDDE PEO Strategies listed below	Frequency:	Review Annually
Description of Activities	Target Audience	Messages	Methods/Resources	
Operations Environmental Policies	NDOT staff involved with O&M of the highway environment	IDDE Policy and Procedures	Distributed to all MS4 facilities. Downloadable from website. Referenced during District Environmental Training and FRCP Oversight Inspections.	
Vehicle Green Card	NDOT staff involved with O&M of the highway environment	Highway Illicit Discharge Procedure	Reference card located in NDOT vehicles outlining highway spill reporting procedure.	
Operations Environmental Training - Part 3	NDOT staff involved with O&M of the highway environment	IDDE Policy and Procedures	On-line Training: Assigned first year of hire and reassigned every 3 years	
Fuel Spill Brochure - External	General Public	What to do when you've had a fuel spill.	Distributed to NDOT Rest Areas across the State.	

BMP 4: IDDE Education and Training

Stormwater Management – Annual Report				
BMP ID: 3.4.2	BMP PEO Strategy:	Distribute IDDE training and education to Department employees who, as part of their normal job responsibilities, may encounter or observe an illicit discharge in the MS4 area.		
	Reference:	MS4 Program File, WORKDAY Employee Training System		
	Responsible Party:	RDC Unit	Frequency:	On-Going Annually
Administration:				
Internal IDDE Brochure distributed matches current IDDE Plan.				
Evaluation/Assessment:				
Material is current				
Annual Performance:				
Administration:				
Vehicle Green Cards distributed matches current IDDE Plan				
Evaluation/Assessment:				
Material is current				
Annual Performance:				
Administration:				
Formal operations environmental program training materials reflect the current IDDE program including response to highway spills and dumping.				
Evaluation/Assessment:				
Material is current				
Annual Performance:				
Administration:				
NDOT employees, who as part of their normal job responsibilities, may come into contact with or observe an illicit discharge or illicit connection to the MS4 area have completed training.				
Evaluation/Assessment:			Tiered Assessment Criteria:	
Number trained vs. total number			90 – 100% Completion = Meets goal	
			80 – 89% Completion = Needs further review	
			< 80% = Requires corrective action	
Annual Performance:				
Effectiveness:				
All NDOT employees at maintenance facilities responsible for maintaining roadway assets within the MS4 areas, who as part of their normal job responsibilities, may encounter or observe an illicit discharge to the MS4 area are to have completed training within one year of hire and every three years after.				
Evaluation/Assessment:			Tiered Assessment Criteria:	
Number trained vs. total number			90 – 100% Completion = Meets goal	
			80 – 89% Completion = Needs further review	
			< 80% = Requires corrective action	
Annual Performance:				
Administration:				
External IDDE Brochure distributed matches current IDDE Plan.				

<u>Evaluation/Assessment:</u> Material is current			
<u>Annual Performance:</u>			
<u>Administration:</u> External IDDE Brochure distributed to rest areas every year.			
<u>Evaluation/Assessment:</u> 50 copies distributed to 20 Rest Area facilities totaling 1000 brochures.			
<u>Annual Performance:</u>			
Satisfied:	<input type="checkbox"/> Yes <input type="checkbox"/> No	Supplemental Notes:	

MCM #4 CONSTRUCTION STORMWATER MANAGEMENT (PERMIT SECTION 3.4.3)

Construction Stormwater Management Decision Process and Rationale

The purpose of this MCM is to minimize pollutants in stormwater runoff from construction activities according to the NPDES Construction Stormwater General Permit. Construction activity requires NDOT to plan, design, inspect and maintain temporary and permanent BMPs for erosion control, sediment control and good housekeeping activities. These combined efforts help reduce pollution risks and manage discharges of construction-related stormwater runoff. NDOT oversees project planning and implementation processes to deliver the needed construction stormwater BMPs. These responsibilities are documented in NDOT's Construction Stormwater Plan. The Construction Stormwater Plan communicates implementation details for stormwater design, permitting, inspection and compliance oversight. The plan enables BMPs listed in this MCM to be achieved.

Stormwater control measures are required by NDOT on projects that disturb at least one acre of soil by placing construction requirements into contract specifications. Clarity is a database used by NDOT to track the progress of completing the stormwater management design and permitting requirements. NDOT creates a project specific Stormwater Pollution Prevention Plan (SWPPP) to satisfy the NPDES Construction Stormwater Permit. The SWPPP template details stormwater control measures for erosion, sediment, and non-sediment pollution sources for each project. Implementation of these control measures follows the specifications approved with the contract for the project. Leveraging NDOT contract specifications to require stormwater controls for erosion, sediment, and good housekeeping allows NDOT to be consistent with contract administration aspects of construction projects.

The Construction Stormwater Plan describes the procedures NDOT follows to enforce erosion and sediment control compliance with the NPDES Construction Stormwater Permit or the contract specifications. If a formal noncompliance action or violation occurs, the Construction Stormwater Plan describes the escalation steps followed to return the project to compliance. Public complaints associated with stormwater controls of individual projects may be formally submitted to NDOT. These are addressed in the Construction Stormwater Plan as corrective actions or a formal noncompliance action. Communication with the project manager or representative about stormwater concerns may be noted in the inspection reports, documented in AASHTOWare Project, SWPPPTrack, or passed on to be submitted as a formal complaint with NDOT.

Construction site inspections are the primary method NDOT utilizes to identify stormwater corrective actions and to document implementation of the SWMP. Inspector training is a high priority for NDOT, and inspectors must maintain a valid certification to inspect projects and oversee the installation and maintenance of stormwater control measures. Qualified inspectors must be knowledgeable about the risk of stormwater pollution and how to communicate corrective actions that reduce the risk pollution can have on receiving waters. Oversight inspections help provide periodic compliance assistance for all projects located within the regulated MS4 areas. Inspection reports and corrective actions are documented and recorded in SWPPPTrack.

Evaluation and assessment of the Construction Stormwater Program is described in the BMP tables for this MCM below. Each goal is established with an evaluation and assessment target. By reaching the target, NDOT is protecting stormwater quality to the maximum extent practicable. The following BMPs are established in support of the Construction Stormwater Program.

BMP 1 Prepare Stormwater Pollution Prevention Plans that address erosion and sediment control requirements for construction sites with NPDES Permits.

BMP 2 Conduct routine and oversight construction site inspections to identify corrective actions needed to satisfy the SWMP and the NPDES Construction Stormwater Permit requirements.

BMP 3 Maintain enforcement procedures to respond to corrective actions, formal non-compliance and violations effectively.

BMP 4 Deliver education about the impact of construction stormwater pollution and procedures for design, inspection, and maintenance of erosion and sediment control BMPs.

MCM 4

BMP 1: Construction Stormwater Pollution Prevention Plans (SWPPPs)

Stormwater Management – BMP Implementation Activities			
BMP ID: 4.1.1.	Regulatory Background:	The Department will maintain construction SWPPP review procedures (Permit Section 3.4.3).	
	BMP Rationale:	Review and approve documented procedures and practices that will be used to provide temporary and permanent soil stabilization and water quality protection during the construction and final stabilization process.	
	Report:	Observations, recommendations, and/or changes made to program references during permit year.	
	References:	Construction Stormwater Plan	Frequency:

BMP 1: Construction Stormwater Pollution Prevention Plans (SWPPPs)

Stormwater Management – Annual Report			
BMP ID: 4.1.2.	BMP Strategy:	Develop, review, and approve construction stormwater pollution prevention plans (SWPPP) for Department projects that will disturb at least one acre of soil surface alone or as part of a larger common plan of development or sale.	
	Reference:	Clarity Database,-SWPPPTrack	
	Responsible Party:	RDC Unit	Frequency:
Administration: Complete Design Activity: Roadside SWPPP Development.			
Evaluation/Assessment: Number completed vs. total number		Tiered Assessment Criteria: 90 – 100% Completion = Meets goal 80 – 89% Completion = Needs further review < 80% = Requires corrective action	
Annual Performance:			
Administration: Complete SWPPP template for every stormwater permitted project each reporting year.			
Evaluation/Assessment: Number completed vs. total number		Tiered Assessment Criteria: 90 – 100% Completion = Meets goal 80 – 89% Completion = Needs further review < 80% = Requires corrective action	
Annual Performance:			

BMP ID: 4.1.2 Continued			
Effectiveness: RDC Unit manager approval of NDOT Construction SWPPPs			
Evaluation/Assessment: Number completed vs. total number		Tiered Assessment Criteria: 90 – 100% Completion = Meets goal 80 – 89% Completion = Needs further review < 80% = Requires corrective action	
Annual Performance:			
Satisfied:	<input type="checkbox"/> Yes <input type="checkbox"/> No	Supplemental Notes:	

BMP 2: Construction Stormwater Inspections

Stormwater Management – BMP Implementation Activities				
BMP ID: 4.2.1	Regulatory Background:	The Department will maintain construction SWPPP inspection procedures in the Construction Stormwater Plan (Permit Section 3.4.3.6)		
	BMP Rationale:	Conduct site inspections that document site conditions and compliance efforts and support compliance assistance efforts.		
	Report:	Observations, recommendations, and/or changes made to program references during permit year.		
	References:	Construction Stormwater Plan	Frequency:	Review Annually

BMP 2: Construction Stormwater Inspections

Stormwater Management – Annual Report				
BMP ID: 4.2.2	BMP Strategy:	Conduct site inspections for NPDES construction stormwater permitted roadway projects and document compliance with construction stormwater BMP installation and maintenance requirements.		
	Reference:	SWPPPTrack		
	Responsible Party:	RDC Unit and Project Staff	Frequency:	On-Going Annually
Administration: Scheduled construction stormwater inspections are conducted during the reporting period.				
Evaluation/Assessment: Total number submitted				
Annual Performance:				

Administration:

Compliance oversight inspections are conducted during reporting period.

Evaluation/Assessment:

Total number submitted

Annual Performance:

Administration:

Project close-out inspections are conducted during reporting period.

Evaluation/Assessment:

Total number submitted

Annual Performance:

Effectiveness:

Scheduled stormwater inspections are completed on average once every 14 days during construction and once every 30 days during establishment.

Evaluation/Assessment:

Number completed vs. total expected based on planned frequency

Tiered Assessment Criteria:

90 – 100% Completion = Meets goal
 80 – 89% Completion = Needs further review
 < 80% = Requires corrective action

Annual Performance:

Effectiveness:

Compliance oversight inspections are completed on average once every calendar year.

Evaluation/Assessment:

Number completed vs. total planned

Tiered Assessment Criteria:

95 – 100% Completion = Meets goal
 85 – 94% Completion = Needs further review
 < 85% = Requires corrective action

Annual Performance:

Effectiveness:

Project close-out inspections are completed before the Notice of Termination is submitted.

Evaluation/Assessment:

Number completed vs. total planned

Tiered Assessment Criteria:

90 – 100% Completion = Meets goal
 80 – 89% Completion = Needs further review
 < 80% = Requires corrective action

Annual Performance:

Effectiveness:

An investigation is completed by NDOT after a formal complaint is submitted by the public about stormwater management at an active construction site.

Evaluation/Assessment:

Number completed vs. total planned

Tiered Assessment Criteria:

90 – 100% Completion = Meets goal
 80 – 89% Completion = Needs further review
 < 80% = Requires corrective action

Annual Performance:

Satisfied:	<input type="checkbox"/> Yes <input type="checkbox"/> No	Supplemental Notes:	
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BMP 3: Construction Stormwater Enforcement

Stormwater Management – BMP Implementation Activities			
BMP ID: 4.3.1	Regulatory Background:	Maintain enforceable authority within the Department by referencing state regulatory mechanism(s) (Permit Section 3.4.3).	
	BMP Rationale:	Issue timely and consistent enforcement actions and direct the timely resolution of corrective actions, formal non-compliance notices and violations at construction sites.	
	Report:	Observations, recommendations, and/or changes made to program references during permit year.	
	References:	Construction Stormwater Plan	Frequency:

BMP 3: Construction Stormwater Enforcement

Stormwater Management – Annual Report			
BMP ID: 4.3.2	BMP Strategy:	Conduct and record enforcement actions completed for construction stormwater corrective actions, formal non-compliance and/or violations.	
	Reference:	AASHTOWare Project, MS4 Project File, SWPPPTrack	
	Responsible Party:	RDC Unit and Project Staff	Frequency:
Administration: Record each instance of NPDES permit corrective action, formal non-compliance notices and/or violations identified at construction sites.			
Evaluation/Assessment: Recorded enforcement actions			
Annual Performance:			
Effectiveness: An investigation and response is initiated within 48-hours after a formal complaint is provided to NDOT from the public regarding stormwater management at an active construction site.			
Evaluation/Assessment: Number completed vs. total number		Tiered Assessment Criteria: 90 – 100% Completion = Meets goal 80 – 89% Completion = Needs further review < 80% = Requires corrective action	
Annual Performance:			
Effectiveness: Records of unresolved formal non-compliance and/or violations are updated once every 14 days with status and any new information until issues is resolved.			
Evaluation/Assessment: Number completed vs. total number		Tiered Assessment Criteria: 90 – 100% Completion = Meets goal 80 – 89% Completion = Needs further review < 80% = Requires corrective action	
Annual Performance:			
Satisfied:	<input type="checkbox"/> Yes <input type="checkbox"/> No	Supplemental Notes:	

BMP 4: Construction Stormwater Education

Stormwater Management – BMP Implementation Activities				
BMP ID: 4.4.1	Regulatory Background:	Maintain construction stormwater educational and training information for distribution at a frequency according to the Public Education and Outreach Strategy (Permit Section 3.4.3.7.1).		
	Report:	Observations, recommendations, and/or changes made to program references during permit year.		
	References:	Construction Stormwater PEO Strategies listed below	Frequency:	Review Annually
Description of Activities	Target Audience	Messages	Methods/Resources	
Environmental Construction Stormwater Bulletins	NDOT construction project staff and construction project contractors	Stormwater/Erosion and Sediment Control BMP Guidance, Inspection and Maintenance Guidance, Training Announcements, Misc. Environmental Updates	Electronically Distributed bulletin. Also, available on NDOT website.	
BMP Field Pocket Guide	NDOT construction project staff and construction project contractors	Installation and Maintenance of Erosion and Sediment Control BMPs. Good Housekeeping BMPs, SWPPP and Stormwater Permit Information.	BMP field guide available for view and download from the NDOT website. Hard copies are distributed during training events and upon request.	
Erosion Control Inspector Certification (5 Year Certification)	NDOT construction project staff and construction project contractors	Stormwater Permit Compliance, Erosion and Sediment Control BMPs, Good Housekeeping/Spill Prevention, Inspection and Maintenance Procedures, SWPPP Management	Online training required for anyone inspecting NDOT projects. Participants are required to take both 1) Erosion Control Inspector Recertification Course and 2) Erosion Control Installer Course.	
Erosion Control Inspector Recertification (5 Year Certification)	NDOT construction project staff and construction project contractors	Stormwater Permit Compliance, Erosion and Sediment Control BMPs, Good Housekeeping/Spill Prevention, Inspection and Maintenance Procedures, SWPPP Management	On-line training course. Recertification is required every 5 years.	
Erosion Control Installer Course (5 Year Certification)	NDOT construction site operators, supervisors, and technicians	Construction Stormwater Program, NDOT Erosion Control Plan Reading, Soil Erosion, Erosion and Sediment Control BMPs and Good Housekeeping BMPs	On-line training course. Participants must complete this online course to install and/or maintain erosion and sediment control BMPs on NDOT projects.	
District Environmental Roundtables - Construction	NDOT construction project staff	Stormwater Permit Compliance, Erosion and Sediment Control BMPs, Good Housekeeping/Spill Prevention, Inspection and Maintenance Procedures, SWPPP Implementation.	Interactive roundtable meeting/training provided at each District office on an annual basis.	

BMP 4: Construction Stormwater Education

Stormwater Management – Annual Report				
BMP ID: 4.4.2	BMP PEO Strategy:	Distribute education materials and implement training related to construction stormwater pollution.		
	Reference:	MS4 Program File, LTAP Training Records,-SWPPPTrack		
	Responsible Party:	RDC Unit	Frequency:	On-Going Annually
Administration: Construction stormwater bulletins are provided to construction site staff and operators.				
Evaluation/Assessment: Two bulletins distributed per year				
Annual Performance:				
Administration: BMP Field Pocket Guide information is provided to construction site staff and operators.				
Evaluation/Assessment: Total number of attendees taking the online course each year and total number of hard copy pocket guides distributed during other training events.				
Annual Performance:				
Effectiveness: NDOT construction stormwater inspector certification is required every 5 years by Department construction project staff and construction projects contractors involved in project inspections and directing installation of erosion and sediment control BMPs.				
Evaluation/Assessment: Total number of certification courses completed				
Annual Performance:				
Effectiveness: District Construction Environmental Roundtables are provided at each District Office to review construction stormwater requirements and procedures.				
Evaluation/Assessment: Number completed vs. total number			Tiered Assessment Criteria: 90 – 100% Completion = Meets goal 80 – 89% Completion = Needs further review < 80% = Requires corrective action	
Annual Performance:				
Satisfied:	<input type="checkbox"/> Yes <input type="checkbox"/> No	Supplemental Notes:		

MCM #5 POST CONSTRUCTION STORMWATER MANAGEMENT (PERMIT SECTION 3.4.4)

Post Construction Stormwater Management Decision Process and Rationale

The purpose of this MCM is to include appropriate stormwater treatment BMPs on projects undergoing new development or redevelopment resulting in land disturbance of greater than or equal to one acre. This approach to roadway design addresses the on-going discharge of non-point source pollution from stormwater runoff after a project is complete. This MCM requires NDOT to plan, design, construct, inspect and maintain applicable stormwater treatment facilities. To accomplish this requirement, NDOT integrates stormwater treatment design into the roadway design process. These responsibilities are documented in the Post Construction Stormwater Plan. The Post Construction Stormwater Plan communicates, within NDOT, implementation details for stormwater treatment facility design, permitting, inspection and compliance oversight. The plan enables BMPs listed in this MCM to be achieved.

Chapter three of the Drainage Design and Erosion Control Manual (DDECM) outlines the design process and provides design guidelines for types of stormwater treatment facilities that may be included in the roadway design. Design forms have been adopted and incorporated into the design process to help NDOT Design Division staff determine if stormwater treatment is required and to provide the necessary documentation. Clarity is a database used to document that the design review steps have been completed for each project located in the NDOT MS4 Area.

Training for NDOT staff and consultant designers is important in raising awareness of requirements and equipping designers with the knowledge to satisfy the design procedures for stormwater treatment. Not all roadway designers work on projects that are located within NDOT MS4 areas. Thus, training is offered on an as-needed basis to both NDOT roadway designers and consultant designers. In addition, the Roadside Development and Compliance (RDC) Unit along with the Roadway Design Hydraulics Unit provide stormwater treatment design guidance to roadway designers on a project-by-project basis.

Stormwater Treatment Facility maintenance guides and inspection requirements are maintained by NDOT for each type of treatment facility. The RDC Unit will coordinate with maintenance staff responsible for each highway segment where stormwater treatment facility maintenance is required. SWPPTrack is utilized to track inspections and corrective actions, and sends reminders when action is required.

Evaluation and assessment of the Post Construction Stormwater Program is described in the BMP tables for this MCM below. Each goal is established with an evaluation and assessment target. By reaching the target, NDOT is protecting stormwater quality to the maximum extent practicable. The following BMPs are established in support of the Post Construction Stormwater Program.

BMP 1 Maintain authority and compliance oversight procedures necessary to require stormwater treatment facilities to be designed, constructed, and maintained on required projects.

BMP 2 Maintain and implement procedures necessary to facilitate planning and design of stormwater treatment facilities that will be constructed on required projects.

BMP 3 Maintain and implement inspection procedures necessary to evaluate and direct the maintenance of constructed stormwater treatment facilities.

MCM 5

BMP 1: Post Construction Stormwater Control Authority

Stormwater Management – BMP Implementation Activities				
BMP ID: 5.1.1	Regulatory Background:	Maintain enforceable authority and escalation procedures for the MS4 Post Construction Stormwater (PCSW) program with state regulatory mechanisms (Permit 3.4.4).		
	Report:	Observations, recommendations, and/or changes made to program references during permit year.		
	References:	Post Construction Stormwater Plan	Frequency:	Review Annually

BMP 1: Post Construction Stormwater Control Authority

Stormwater Management – Annual Report				
BMP ID: 5.1.2	Strategy:	Implement compliance oversight procedures for permanent stormwater treatment facility requirements.		
	Reference:	SWPPPTrack		
	Responsible Party:	RDC Unit	Frequency:	On-Going Annually
Administration: Record Stormwater Treatment Facility/Project, date compliance oversight initiated, reason for non-compliance or violation, date corrective actions are identified, nature of action required, date action was resolved or place on capital expenditures log and final resolution of non-compliance with Post Construction Stormwater treatment requirements.				
Evaluation/Assessment: Recorded				
Annual Performance:				
Effectiveness: Initiate investigation within seven (7) days of identification of potential non-compliance.				
Evaluation/Assessment: Number of investigations initiated vs. total number of potential non-compliance		Tiered Assessment Criteria: 95 – 100% Completion = Meets goal 85 – 94% Completion = Needs further review < 85% = Requires corrective action		
Annual Performance:				
Effectiveness: Unresolved records of corrective actions, non-compliance or violation are updated once every 30 days with changes in status and any new information until the issue is resolved.				
Evaluation/Assessment: Number of records updated vs. total number of unresolved records		Tiered Assessment Criteria: 95 – 100% Completion = Meets goal 85 – 94% Completion = Needs further review < 85% = Requires corrective action		
Annual Performance:				

Effectiveness:

Summarize all instances of non-compliance or violations that were closed without resolution, including who made the determination to close the record and why the occurrence could not be resolved.

Evaluation/Assessment:

Record instances closed without resolution

Annual Performance:

Satisfied:	<input type="checkbox"/> Yes <input type="checkbox"/> No	Supplemental Notes:	
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BMP 2: Stormwater Treatment Design Process Review

Stormwater Management – BMP Implementation Activities

BMP ID: 5.2.1	Regulatory Background:	Maintain design process review procedures for the MS4 Post Construction Stormwater (PCSW) program		
	Report:	Observations, recommendations, and/or changes made to program references during permit year.		
	References:	Post Construction Stormwater Plan, PEO Strategies listed below	Frequency:	Review Annually
Description of Activities		Target Audience	Messages	Methods/Resources
NDOT Stormwater Treatment Facilities – Design Guides		Department Roadway Designers and Consultant Designers	Design guidance for NDOT Stormwater Treatment Facilities	Design Guides referenced during Stormwater Treatment Design Class and available for download from NDOT website
NDOT Stormwater Treatment Facilities – Maintenance Guides		Department staff involved with Maintenance Facility and Highway O&M. Adjacent MS4 Program Managers	Maintenance guidance for NDOT Stormwater Treatment Facilities.	Design Guides referenced during Stormwater Treatment Design Class and available for download from NDOT website.
Stormwater Treatment Design Class		Department Roadway Designers and Consultant Designers	Post Construction Stormwater Design Process (Chapter 3 of Drainage Design and Erosion Control Manual)	Live Classroom Training conducted on as-needed basis.

BMP 2: Stormwater Treatment Design Process Review

Stormwater Management – Annual Report				
BMP ID: 5.2.2	PEO Strategy:	Conduct and record the status and Post Construction design process review efforts for construction projects that will disturb at least one acre of soil alone or as part of a larger common plan of development or sale.		
	Reference:	Clarity Database, OnBase document management system		
	Responsible Party:	RDC Unit and Roadway Designers	Frequency:	On-Going Annually
Administration: Stormwater Treatment Facility Design Guides are in line with current policies.				
Evaluation/Assessment: Material is current				
Annual Performance:				
Administration: Stormwater Treatment Facility Maintenance Guides are in line with current policies				
Evaluation/Assessment: Material is current				
Annual Performance:				
Administration: Stormwater Treatment Facility Design training is made available for DOT Roadway Designers and consultant designers responsible for stormwater treatment facility design.				
Evaluation/Assessment: Stormwater Treatment Design training provided				
Annual Performance:				
Administration: Complete post construction stormwater treatment Form A for every new development and redevelopment project within the MS4 area.				
Evaluation/Assessment: Total number completed				
Annual Performance:				

BMP ID: 5.2.2 Continued

Administration:

Complete post construction stormwater treatment Form B for every project required to consider post construction stormwater treatment based on Form A review.

Evaluation/Assessment:

Total number completed

Annual Performance:

Administration:

Professional Engineer signs off that permanent stormwater treatment facilities meet NDOT design standards

Evaluation/Assessment:

Number of engineer-approved designs vs. total number of final designs

Tiered Assessment Criteria:

95 – 100% Completion = Meets goal
 85 – 94% Completion = Needs further review
 < 85% = Requires corrective action

Annual Performance:

Satisfied:	<input type="checkbox"/> Yes <input type="checkbox"/> No	Supplemental Notes:	
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BMP 3: Stormwater Treatment Site Inspections

Stormwater Management – BMP Implementation Activities

BMP ID: 5.3.1	Regulatory Background:	Maintain site inspection procedures for the MS4 Post Construction Stormwater (PCSW) program (Permit Section 3.4.4).		
	Report:	Observations, recommendations, and/or changes made to program references during permit year.		
	References:	Post Construction Stormwater Plan, Stormwater Treatment BMP Maintenance and Inspection Guides	Frequency:	Review Annually

BMP 3: Stormwater Treatment Site Inspections

Stormwater Management – Annual Report				
BMP ID: 5.3.2	Strategy:	Conduct and record site inspections for new development and redevelopment projects to document stormwater treatment facility installation and maintenance compliance.		
	Reference:	SWPPPTrack		
	Responsible Party:	RDC Unit	Frequency:	On-Going Annually
Administration: Record the total number of permanent stormwater treatment facility inspections conducted during reporting period				
Evaluation/Assessment: Total number recorded				
Annual Performance:				
Effectiveness: All complaints provided from the public about stormwater management of an approved STF leads to an investigation within seven (7) days or a documented reason why an investigation was not conducted.				
Evaluation/Assessment: Number of complaints investigated/documented vs. total number of complaints			Tiered Assessment Criteria: 90 – 100% Completion = Meets goal 80 – 89% Completion = Needs further review < 80% = Requires corrective action	
Annual Performance:				
Effectiveness: First inspections are completed within one year following closing of the project NPDES construction stormwater permit.				
Evaluation/Assessment: Number of first inspections completed vs. total number of closed projects			Tiered Assessment Criteria: 90 – 100% Completion = Meets goal 80 – 89% Completion = Needs further review < 80% = Requires corrective action	
Annual Performance:				
Effectiveness: Inspections are completed annually after the first project close out inspection.				
Evaluation/Assessment: Number of annual inspections completed vs. total number of first project close out inspections			Tiered Assessment Criteria: 90 – 100% Completion = Meets goal 80 – 89% Completion = Needs further review < 80% = Requires corrective action	
Annual Performance:				
Satisfied:	<input type="checkbox"/> Yes <input type="checkbox"/> No	Supplemental Notes:		

MCM #6 GOOD HOUSEKEEPING AND POLLUTION PREVENTION (PERMIT SECTION 3.4.5)

Good Housekeeping and Pollution Prevention Decision Process and Rationale

The purpose of this MCM is to prevent or reduce stormwater pollutant runoff potentially caused by NDOT operations and maintenance activities along state highways and maintenance facilities. Federal guidance for this MCM encourages the improvement of operation and maintenance activities, maintenance schedules, and long-term inspection procedures for structural and non-structural storm water controls. NDOT accomplishes the requirements of the BMPs described for this MCM by utilizing multiple Agency departments, establishes policies and procedures when required, and educates staff responsible for identifying, documenting, and resolving issues that can result in stormwater pollution.

Two types of operations are reflected in the BMPs of this section. The first includes maintenance facilities that receive, store, and maintain vehicles, equipment, and materials. The other type is operation of the state highway system within the regulated MS4 areas. All maintenance facilities and all freeways of the state highway system are maintained by NDOT while State Statute³ designates maintenance of some portions of the State Highway System to be maintained and operated by the local jurisdictions.

Staff members that operate and maintain maintenance facilities and the state highway system take part in the comprehensive environmental training. Online training courses are required of all staff at maintenance facilities located within the MS4 area. In addition to on-line training, compliance visits by RDC Unit staff at District offices and individual maintenance facilities during the year are used to review stormwater compliance information and any changes to policies and procedures with staff members. More information about training and education is provided in BMP 3.

Implementation details for Good Housekeeping/Pollution Prevention requirements are documented in the NDOT Good Housekeeping Pollution Prevention Plan and the NDOT Maintenance Manual. The Good Housekeeping Pollution Prevention Plan directs implementation of stormwater BMPs at maintenance facilities and along the regulated sections of State Highway System. The Good Housekeeping/Pollution Prevention BMPs refer to functional maintenance activities and activity codes listed in NDOT's Maintenance Manual.

Oversight and direction for this program is led by staff in the Roadside Development and Compliance (RDC) Unit through close coordination with leadership in the Operations Division. This group provides direction to Facility Superintendents and Supervisors who are ultimately responsible for implementing the day-to-day activities required by the Good Housekeeping/Pollution Prevention program.

Every BMP listed in this Section includes measurable goals that NDOT implements. The Evaluation and Assessment measure provides a baseline that, when compared to the annual performance, will help communicate the success and effectiveness of the program toward protecting stormwater quality to the maximum extent practicable.

Evaluation and assessment of the Good Housekeeping/Pollution Prevention Program is described in the BMP tables for this MCM below. Each goal is established with an evaluation and assessment target. By reaching the target, NDOT is protecting stormwater quality to the maximum extent practicable. The following BMPs are established in support of the Good Housekeeping/Pollution Prevention Program.

BMP 1 Maintain and implement procedures to manage the risk of pollution from stormwater runoff at highway maintenance facilities.

³ Revised Statutes §39-1301 and §39-2101.

BMP 2 Maintain and implement procedures to manage the risk of pollution related to operating and maintaining highway surfaces and stormwater drainage system.

BMP 3 Maintain and implement education and training intended to direct the reduction of stormwater pollution from highway maintenance facilities, highways and stormwater drainage system with appropriate inspections, best management practices and corrective actions.

MCM 6

BMP 1: NDOT MS4 Facility Maintenance Activities

Stormwater Management – BMP Implementation Activities				
BMP ID: 6.1.1	Regulatory Background:	Maintain MS4 maintenance facility evaluation and maintenance procedures (Permit Section 3.4.5).		
	BMP Rationale:	Equip employees with resources and training needed to minimize pollutants associated with maintenance facility activities.		
	Report:	Observations, recommendations, and/or changes made to program references during permit year.		
	References:	Good Housekeeping and Pollution Prevention Plan	Frequency:	Review Annually

BMP 1: NDOT MS4 Facility Maintenance Activities

Stormwater Management – Annual Report				
BMP ID: 6.1.2	BMP Strategy:	Conduct and record MS4 maintenance facility stormwater inspections and record results in a central database.		
	Reference:	OnBase/DIRK, SWPPPTrack		
	Responsible Party:	RDC Unit and Facility Staff	Frequency:	On-Going Annually
<p>Administration: Record the total number of maintenance facility environmental inspections conducted for each MS4 facility. Include the following: date corrective actions are identified, nature of action required, date action was resolved.</p>				
<p>Evaluation/Assessment: Total number recorded</p>				
<p>Annual Performance:</p>				
<p>Administration: Record the total number of maintenance facility compliance oversight inspections conducted for all MS4 facilities. Include the following: review of and pending corrective actions for the maintenance facility (6.1.2) and all MS4 highway facilities (6.2.2) maintained by the staff from the facility.</p>				
<p>Evaluation/Assessment: Total number recorded</p>				
<p>Annual Performance:</p>				

BMP ID: 6.1.2 (Continued)

Effectiveness:

High priority MS4 maintenance facilities receive quarterly maintenance facility environmental inspections.

Evaluation/Assessment:

Number completed vs. total number

Tiered Assessment Criteria:

95 – 100% Completion = Meets goal
 85 – 94% Completion = Needs further review
 < 85% = Requires corrective action

Annual Performance:

Effectiveness:

All corrective actions are addressed within 30 days or by the documented due date.

Evaluation/Assessment:

Number addressed/documentated vs. total number

Tiered Assessment Criteria:

95 – 100% Completion = Meets goal
 85 – 94% Completion = Needs further review
 < 85% = Requires corrective action

Annual Performance:

Effectiveness:

Each facility receives at least one maintenance facility compliance oversight site inspection per year.

Evaluation/Assessment:

Number completed vs. total number

Tiered Assessment Criteria:

95 – 100% Completion = Meets goal
 85 – 94% Completion = Needs further review
 < 85% = Requires corrective action

Annual Performance:

Effectiveness:

All complaints provided from the public about stormwater management of an MS4 maintenance facility leads to investigation within seven (7 days) or a documented reason why an investigation was not conducted.

Evaluation/Assessment:

Number completed vs. total number

Tiered Assessment Criteria:

95 – 100% Completion = Meets goal
 85 – 94% Completion = Needs further review
 < 85% = Requires corrective action

Annual Performance:

Satisfied:	<input type="checkbox"/> Yes <input type="checkbox"/> No	Supplemental Notes:	
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BMP 2: NDOT Highway Environmental Maintenance Activities

Stormwater Management – BMP Implementation Activities				
BMP ID: 6.2.1	Regulatory Background:	Maintain MS4 highway maintenance and stormwater drainage system evaluation and maintenance procedures.		
	BMP Rational:	Equip employees with resources and training needed to minimize pollutants associated with highway maintenance activities within the MS4 area.		
	Report:	Observations, recommendations, and/or changes made to program references during permit year.		
	References:	Good Housekeeping and Pollution Prevention Plan	Frequency:	Review Annually

BMP 2: NDOT Highway Environmental Maintenance Activities

Stormwater Management – Annual Report				
BMP ID: 6.2.2	BMP Strategy:	Conduct MS4 highway stormwater inspections and record results in a central database.		
	Reference:	SWPPPTrack		
	Responsible Party:	RDC Unit and Facility Staff	Frequency:	On-Going Annually
Administration: Record the total number of MS4 highway facility environmental inspections conducted during the reporting period.				
Evaluation/Assessment: Total number recorded				
Annual Performance:				
Effectiveness: Each highway segment receives a minimum of four highway stormwater facility environmental inspections per year by the assigned maintenance facility. This will be documented on the quarterly FRCP inspection.				
Evaluation/Assessment: Number completed vs. total number			Tiered Assessment Criteria: 95 – 100% Completion = Meets goal 85 – 94% Completion = Needs further review < 85% = Requires corrective action	
Annual Performance:				

BMP ID: 6.2.2 Continued

Administration:

All recorded corrective actions are resolved within 30 days or by the documented due date.

Evaluation/Assessment:

Number resolved/documented vs. total number

Tiered Assessment Criteria:

95 – 100% Completion = Meets goal
 85 – 94% Completion = Needs further review
 < 85% = Requires corrective action

Annual Performance:

Satisfied:	<input type="checkbox"/> Yes <input type="checkbox"/> No	Supplemental Notes:	
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BMP 3: Operations and Maintenance Program Environmental Training

Stormwater Management – BMP Implementation Activities

BMP ID: 6.3.1	Regulatory Background:	Maintain training materials for distribution related to reducing stormwater pollution from municipal operation and maintenance activities in the Public Education and Outreach strategy (Permit Section 3.4.5.5).		
	BMP Rational:	Equip employees with resources and training needed to minimize pollutants associated with maintenance facility activities.		
	Report:	Observations, recommendations, and/or changes made to program references during permit year.		
	References:	Post Construction Stormwater Plan, Stormwater Treatment BMP Maintenance, and Inspection Guides	Frequency:	Review Annually

Description of Activities	Target Audience	Messages	Methods/Resources
Maintenance Bulletin	NDOT staff involved with Maintenance Facility and Highway O&M	Stormwater Pollution Prevention/FRCPP Guidance	Electronically distributed and available on NDOT website.
FRCPP General Awareness Handout	NDOT staff involved with Maintenance Facility and Highway O&M	FRCPP General Awareness	Distribute to all MS4 Facilities. Handout available on NDOTs stormwater website.
Good Housekeeping Poster	NDOT staff involved with Maintenance Facility and Highway O&M	Facility Good Housekeeping Guidance	Poster distributed to all MS4 Facilities
Winter Maintenance Poster	NDOT staff involved with Maintenance Facility and Highway O&M	Facility Good Housekeeping Guidance	Poster distributed to all MS4 Facilities

BMP ID: 6.3.1 (Continued)

Description of Activities	Target Audience	Messages	Methods/Resources
Comprehensive Operations Environmental Training – Part 1	NDOT staff involved with Maintenance Facility and Highway O&M	Stormwater Pollution Prevention Practices, Procedures and Policies	On-line Training: Assigned first year of hire and reassigned every 3 years
Comprehensive Operations Environmental Training – Part 2	NDOT staff involved with FRCP Implementation	FRCP Procedures and Policies	On-line Training: Assigned first year of hire and reassigned every 3 years
FRCP Compliance Oversight Inspection/Training	NDOT staff involved with Maintenance managing FRCPs and conducting FRCP inspections	FRCP Implementation and Inspection Procedures. GHPP Program/IDDE Program Procedures and Policies	Facility compliance oversight inspection by RDC staff. Training Materials and Inspection Agenda/Attendance Record
District Environmental Maintenance Roundtable	NDOT staff involved with Maintenance Facility and Highway O&M	GHPP Program/IDDE Program Procedures and Policies	Interactive roundtable meeting provided at each District office in MS4 areas.

BMP 3: Operation and Maintenance Program Environmental Training

Stormwater Management – Annual Report				
BMP ID: 6.3.2	BMP PEO Strategy:	Deliver education and training related to pollution prevention and reduction from operation and maintenance activities conducted by department employees.		
	Reference:	MS4 Program File, WORKDAY Employee Training System		
	Responsible Party:	RDC Unit	Frequency:	On-Going Annually
Administration: Maintenance stormwater bulletins are provided to operation and maintenance staff.				
Evaluation/Assessment: One bulletin distributed per year				
Annual Performance:				
Administration: FRCP General Awareness Handout is provided to facility operation and maintenance staff.				
Evaluation/Assessment: Material is current				
Annual Performance:				
Administration: Facility Good Housekeeping Poster is displayed at operation and maintenance facilities.				
Evaluation/Assessment: Material is current				
Annual Performance:				
Administration: Facility Winter Maintenance Poster is displayed at operation and maintenance facilities.				
Evaluation/Assessment: Material is current				
Annual Performance:				
Effectiveness: All NDOT employees at maintenance facilities within the MS4 area, complete the Comprehensive Operations Environmental Training Parts 1 and 2 within a year of employment and renew within three years of completing Parts 1 and 2.				
Evaluation/Assessment: Number completed vs. total number			Tiered Assessment Criteria: 90 – 100% Completion = Meets goal 80 – 89% Completion = Needs further review < 80% = Requires corrective action	
Annual Performance:				

Effectiveness:

Compliance Oversight Inspections/Training is provided annually at every MS4 high priority maintenance facility.

Evaluation/Assessment:

Number completed vs. total number

Tiered Assessment Criteria:

90 – 100% Completion = Meets goal
 80 – 89% Completion = Needs further review
 < 80% = Requires corrective action

Annual Performance:

Effectiveness:

Maintenance Environmental Roundtable is provided annually at every District Office with MS4 areas to review GH/PP and IDDE requirements and procedures.

Evaluation/Assessment:

Number completed vs. total number

Tiered Assessment Criteria:

90 – 100% Completion = Meets goal
 80 – 89% Completion = Needs further review
 < 80% = Requires corrective action

Annual Performance:

Satisfied:	<input type="checkbox"/> Yes <input type="checkbox"/> No	Supplemental Notes:	
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