

Arizona Department of Transportation

MS4 Statewide Summit

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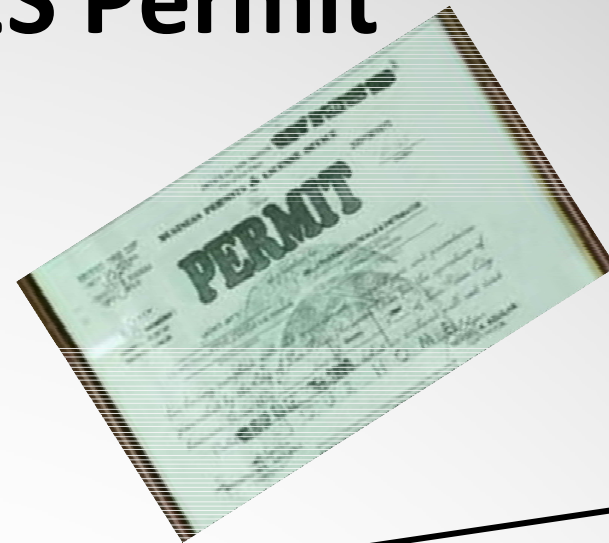
June 18, 2013

Arizona Department of Transportation (ADOT) AZPDES Permit

- ▶ **Statewide, except Indian Country**
- ▶ **Elements of Phase I and Phase II Stormwater Programs**
- ▶ **Authorizes Municipal, Construction, and Industrial activities**
- ▶ **Effective September 2008**

Elements of AZPDES Permit

- ▶ **Stormwater Discharges from:**
 - storm sewer system
 - maintenance facilities
 - construction activities
 - industrial activities
- ▶ **Water Quality Protection**
- ▶ **Monitoring**
- ▶ **Reporting and Recordkeeping**
- ▶ **Penalties**
- ▶ **Standard Conditions**



State of Arizona
Department of Environmental Quality
Water Quality Division

ARIZONA DEPARTMENT OF TRANSPORTATION
STATEWIDE PERMIT FOR DISCHARGE TO
WATERS OF THE UNITED STATES UNDER THE
ARIZONA POLLUTANT DISCHARGE ELIMINATION
SYSTEM PROGRAM Arizona Revised Statutes (A.R.S.)
Title 49, Chapter 2, Article 3.1; Arizona Administrative Code
(A.A.C.) Title 18, Chapter 9, Articles 9 and 10; and the Clean
Water Act, as amended (33 U.S.C. 1251 et seq.)

The Start

Environmental Protection Agency Visit

- ▶ **February 2010** EPA voiced the intent to audit program
- ▶ **May 2010** notified formally
- ▶ **June – August 2010** began internal outreach
- ▶ **June – July 2010** scheduled mock audit of program
- ▶ **October 2010** EPA came to Arizona



What EPA Saw

- ▶ **Construction projects, maintenance yards, and industrial facilities** in the Flagstaff, Phoenix, Prescott and Tucson districts
- ▶ **Focused on**
 - program implementation
 - consistency at District level
 - housekeeping
 - inspections
 - enforcement
- ▶ **What they didn't see...**



A Few Months Later

▶ Several Positive Elements

- knowledgeable of permit requirements and stormwater management plan
- implemented sound monitoring and sampling procedures at construction projects within a $\frac{1}{4}$ mile of impaired and outstanding waters
- environmental coordinators knew local stormwater features and issues



Program Deficiencies

- ▶ **Employee education and training** not fully developed and deployed to appropriate staff
- ▶ **Dry weather monitoring** procedures developed on paper, not fully implemented, storm drain system not 100% mapped, inadequate illicit connection and illicit discharge detection and elimination program
- ▶ **Encroachment permit (MS4)** limited authority to enforce stormwater program; improperly installed/ maintained BMPs
- ▶ **Contractor oversight and BMPs** good housekeeping, signatures on SWPPPs, delegated authority, proof of inspections
- ▶ **Maintenance yard** good housekeeping, inappropriate use of BMPs, track out, material management

ADOT Responds

- ▶ **Mapping of outfalls** at 35% complete, there were 44 thousand drainage features to assess
- ▶ **Staffing to assist** hired four new team members to share workload, two more were anticipated
- ▶ **Environmental Management System** purchased to track
- ▶ **Line by line** explained program deficiencies and included supporting documentation



Summer 2012 - New Years Eve

- ▶ Teleconference with EPA/ADEQ
- ▶ Receive draft Administrative Order on Consent

DRAFT: 12/10/2012

UNITED STATES

ENVIRONMENTAL PROTECTION AGENCY

REGION 9

IN THE MATTER OF:

Arizona Department of Transportation

EPA Docket No. CWA-09-2012-2004

Proceedings under Sections 308(a)

ADMINISTRATIVE ORDER ON CONSENT *and 309(a) of the Clean Water Act, as amended, 33 U.S.C. §§ 1318(a) & 1319(a)*

Administrative Order on Consent

- ▶ **Mapping of ADOT features: outfalls and post-construction best management practices (P-C BMPs)**
 - revised definition of outfall to those discharges to impaired and outstanding Arizona waters
 - reduced menu of P-C BMPs to institute requirements for treating water quality
- ▶ **Inspection and maintenance of outfalls and P-C BMPs**



Administrative Order on Consent

- ▶ **Enforcement of construction project requirements**
 - placement of contractor oversight to oversee, direct, and conduct inspections of all construction activities initiated or controlled within the district; and
 - take appropriate enforcement actions to ensure compliance by ADOT's contractors with the General Construction Permit and ADOT's Permit.



Here Forward

▶ Reporting

- team: Environmental Services and State Engineer's Office
- three compliance reports remain
- managing program deliverables
- concurrently drafting individual permit renewal

ADMINISTRATIVE ORDER ON CONSENT COMPLIANCE SCHEDULE		
Deadline	Task	Responsible Organization
4/15/13	Ensure placement of contractor oversight and compliance personnel in all nine districts.	ITD Received 4/4/2013
	Submit a report with the name and contact information for the designated Resident Engineer or equivalent for each district.	OES Submitted 4/13/2013
5/15/13	Obtain a draft Water Quality Post-Construction BMP Manual from its consultant for review and comment.	OES (coordinate ITD input)
6/30/13	Provide comments on draft Water Quality Post-Construction BMP Manual to consultant.	OES
8/30/13	Complete mapping of Task I AOC Outfalls (Globe, Holbrook, Phoenix).	OES (coordinate with FIS)
	Complete Water Quality Post-Construction BMP Manual modifications.	OES

QUESTIONS ??

- ▶ [http://www.azdot.gov/Inside ADOT/OES/Water Quality/Index.asp](http://www.azdot.gov/Inside_ADOT/OES/Water_Quality/Index.asp)
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