Arizona Department of Transportation

MS4 Statewide Summit
Presentation by Leigh Waite, CMS4S

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
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 ¼ 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

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QUESTIONS ??

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