



NPDES Phase II Stormwater Management Plan



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Mississippi Department of Transportation

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1.0 INTRODUCTION

1.1 EXECUTIVE SUMMARY

The Mississippi Department of Transportation (MDOT) is pleased to provide this MDOT NPDES Phase II Stormwater Management Plan to the Mississippi Department of Environmental Quality (MDEQ). This plan has been developed to address existing water quality issues and to prevent water quality impairment due to polluted stormwater runoff at existing and future Mississippi Transportation Corridors. The following program represents a revision of the most recent plan permitted during the second Phase II permitting cycle from 2009-2016 in Mississippi. This five-year permitting cycle will extend from 2016-2021. This plan has been developed as an issue-specific Five-year Stormwater Phase II Program, and the specific issues to be addressed via the program are as follows:

1. General stormwater runoff pollution typically associated with transportation corridors and activities associated with the development or redevelopment of transportation routes within the MDOT MS4;
2. Maintenance related activities including the application of pesticides, herbicides and fertilizers to roadsides, medians and other areas within established MDOT rights-of-way located within the MDOT MS4;
3. Illegal dumping and improper disposal of common waste products that have the potential to adversely affect water quality in State waters;
4. Erosion and sedimentation associated with roadway construction and development and post-construction stormwater management at transportation rights-of-way;
5. Efforts to educate the public on the adverse effects of littering and the potential negative impacts associated with impaired water quality; and
6. Pollution prevention and good housekeeping associated with maintenance facilities and roadway construction.

The counties impacted by the MDOT Stormwater Management Plan include DeSoto, Forrest, Hancock, Harrison, Hinds, Jackson, Lamar, Madison, and Rankin.

1.2 REGULATORY HISTORY

In 1987, Congress amended the Clean Water Act (CWA) to require a two-phased comprehensive national program to address stormwater discharges and the associated non-point source pollution occurring as a result of unregulated stormwater discharges. The first phase of the program, commonly referred to as "Phase I" was promulgated on November 16, 1990, (55 FR 47990). Phase I in 40 CFR Parts 9, 122, 123 and 124 requires National Pollution Discharge Elimination System (NPDES) permits for stormwater discharges from priority sources including municipal separate storm sewer systems (MS4s) generally serving populations of 100,000 or more, eleven categories of industrial activities, and construction sites that disturb five or more acres of land. In response to this requirement, MDOT developed a Stormwater Pollution Prevention Plan (SWPPP) in October 1992 and a revised document in 2004. This SWPPP was subsequently approved by the MDEQ. MDOT is currently in the process of modifying the 2004 SWPPP. This document will serve as the standard for controlling stormwater runoff from MDOT construction sites that disturb more than five acres.

Phase II, which is the second phase of the stormwater program resulting from the 1987 CWA amendment, expands the existing Phase I Program to include discharges of stormwater from smaller municipalities located within Census-designated urbanized areas and from construction sites that disturb more than one acre of land.

The Stormwater Phase II Rule extends coverage of the NPDES Stormwater Management Program to certain “small” MS4s but takes a different approach than the Phase I Program with respect to how local programs are developed and implemented. The Phase II Program for MS4s is designed to accommodate a general permit approach using a Notice of Intent (NOI) as the permit application. The Phase II Rule automatically covers, on a nationwide basis, all MS4s located within Census-designated urbanized areas. On March 10, 2003, all regulated entities submitted a Stormwater Management Plan along with an NOI to comply with existing State General Permits. All Phase II Plans must address the following six minimum control measures:

- Public Education and Outreach,
- Public Participation and Involvement,
- Illicit Discharge Detection and Elimination,
- Construction Site Runoff Control,
- Post-Construction Runoff Control, and
- Pollution Prevention / Good Housekeeping.

1.3 MDOT STORMWATER MANAGEMENT PLAN SCOPE

The permitting of MDOT’s small MS4 at state and interstate highways, their rights-of-way, and thoroughfares (including streets, roads, bridges, maintenance facilities, service areas and rest areas) within the jurisdictional boundary of MDOT in the State of Mississippi is required as a result of the U.S. Environmental Protection Agency’s (EPA) Phase II Stormwater Rule. The NPDES final regulation was promulgated on December 8, 1999. Mississippi is a delegated State to implement the NPDES program, and the MDEQ is the permitting authority for the State of Mississippi.

Many MS4s exist partially within designated urbanized areas. The Phase II Rule only requires those portions of the MS4 within the urbanized areas to have MS4 permit coverage. This provision does not apply to those MS4s designated by MDEQ in their entirety. For MDOT, permit coverage must be obtained for the entire counties (including municipalities) located within or partially within urbanized areas. The counties impacted by the MDOT Stormwater Management Plan include DeSoto, Forrest, Hancock, Harrison, Hinds, Jackson, Lamar, Madison, and Rankin. MDOT made an administrative decision to apply the Stormwater Management Plan provisions to the entire MS4 for the following reasons:

- Ease of administration for the MDOT as well as for MDEQ;
- Consistent requirements for developers, agency staff, residents, industries, etc. across MDOT’s jurisdiction;
- A high probability exists for expansion of urbanized areas and the need for coverage in the future;
- Stormwater pollution potential from the urban fringe is very similar to the potential from urban cores; and
- MDEQ may designate the entire MS4 as needing permit coverage due to certain circumstances (e.g., discharge to sensitive waters, existing or potential Total

Maximum Daily Load (TMDL) requirements, high potential for water quality impacts typically associated with certain land uses and a large number of water quality related complaints from certain areas).

1.4 MDOT ADMINISTRATIVE POLICY

It is the policy of MDOT to require all of its Divisions and District Offices to understand and comply with the contents of the Stormwater Management Plan and the requirements of the NPDES regulations as administered by the MDEQ. This document, and the latest version of MDOT's SWPPP approved by MDEQ, will serve as MDOT's standard operating procedures for stormwater management until notified of required changes. This document will be considered as an ongoing or "living" document that may be changed, updated or altered periodically to ensure compliance with the most current regulations or guidance. Future modifications will be submitted for approval by MDEQ.

The Mississippi Department of Transportation is responsible for providing a safe intermodal transportation network that is planned, designed, constructed and maintained in an effective, cost efficient, and environmentally sensitive manner. It is our intention to develop a plan for stormwater management that allows us to fulfill our mission in the most environmentally sensitive manner practicable.

1.5 OVERVIEW OF THE REQUIRED MINIMUM MEASURES

1.5.1 PUBLIC EDUCATION (PE):

Raising public awareness regarding water quality impairment and providing education to the public are essential to changing the behavior of the general public and users of the MDOT transportation system. Using education materials in conjunction with public service announcements, classroom curriculum, website links, and presentations to civic and community groups will assist in educating a wide range of the population. Education of specific targeted audiences such as contractors and subcontractors will ensure that MDOT's stormwater management policies are carried out consistently throughout the counties referenced.

1.5.2 PUBLIC INVOLVEMENT (PI):

Public awareness of water quality issues and a sense of civic pride can be raised by encouraging public participation and direct involvement to promote the achievement of established water quality standards. MDOT's public involvement programs are specifically designed to encourage a sense of pride and to encourage stakeholder involvement within the geographical areas where MDOT's policies are focused.

1.5.3 ILLICIT DISCHARGES IDENTIFICATION AND ELIMINATION (ID):

MDOT recognizes that illicit discharges may take many forms and may be generated from a variety of sources. The Best Management Practices (BMPs) selected to address illicit discharge detection and elimination are chosen because they provide for a comprehensive approach to identifying and eliminating illicit discharges within and adjacent to MDOT rights-of-way. These BMPs include inspection procedures, collection and inventory of spatial data within regulated areas, and the establishment of detection and reporting procedures for illegal dumping activities. Illicit discharge BMPs are also

designed to ensure that employees are properly trained to identify and report the various forms of illicit discharges.

1.5.4 CONSTRUCTION SITE STORMWATER RUNOFF CONTROL (CS):

Because of the type and scope of the typical MDOT construction project, it is critical that attention to proper stormwater management begin at the earliest possible planning and design stages, and continue throughout the construction process. Strategies focused on construction runoff management are specifically designed to track potential threats to water quality throughout all stages of construction from plan development to project close-out in order to promote a successful transition from construction stormwater management to post-construction stormwater management.

1.5.5 POST CONSTRUCTION STORMWATER MANAGEMENT (PC):

Providing standards and policies in conjunction with providing training and education will allow MDOT to promote measures that will directly address pertinent stormwater related issues once construction is completed. MDOT's plan for post-construction runoff management focuses on long-term maintenance of post-construction BMPs and the protection of sensitive and/or impaired water bodies. It is the intention of MDOT to promote the use of vegetative post-construction BMPs to the greatest extent practicable.

1.5.6 POLLUTION PREVENTION / GOOD HOUSEKEEPING (PP):

Through the Pollution Prevention / Good Housekeeping Minimum Measure MDOT has and will continue to implement an Operations and Maintenance Program directed at ensuring that its internal operations are conducted in such a way as to minimize potentially negative impacts to water quality. Many of the policies and procedures focus on MDOT's internal operations and the maintenance of MDOT facilities, including vehicles, equipment and long-term maintenance of roadways under MDOT's jurisdiction. These policies address issues such as spill prevention and response, vehicle maintenance, application of pesticides and herbicides within MDOT rights-of-way, and employee training. MDOT conducts regular training for employees to ensure that they have the knowledge and tools to properly handle potentially harmful materials, to identify conditions that may lead to water quality impairment, and to properly document and report incidents and occurrences that may contribute to water quality impairment.

1.6 GENERAL PLAN ASSUMPTIONS

The implementation of this Stormwater Management Plan is the responsibility of multiple divisions within MDOT. No single division bears the majority of the responsibility in ensuring that all measures are complied with. However, the general coordination, documentation and annual reporting lie primarily with the Roadway Design Division of MDOT with strong support from other divisions. Each minimum measure section of this plan includes an implementation schedule for each BMP identified under each minimum measure including the MDOT division identified as having implementation responsibility. Unless otherwise identified, the Division Director of each MDOT division is responsible for implementation of BMPs assigned to his or her division.

2.0 PUBLIC EDUCATION AND OUTREACH

The Public Education and Outreach minimum measure consists of BMPs that focus on the development and distribution of education materials designed to inform the public

about the impacts of contaminated stormwater discharges on local water bodies and cumulative impacts that polluted discharges have on watersheds as a whole. The Public Education and Outreach efforts are also designed to motivate the general public to take active steps to reduce pollutants in stormwater runoff. MDOT employs a strategy of integrating stormwater education with other educational topics such as litter prevention and control, illegal dumping, etc.

2.1 PUBLIC EDUCATION AND OUTREACH RATIONALE STATEMENT

Each BMP within the Public Education and Outreach Minimum measure was selected using a process of 1) research of local, state, and federal BMP databases, 2) consideration of existing practices with regard to applicability to existing water quality issues, 3) consideration of new practices with regard to economic impacts and impacts of integration into the regulated entity's operation systems, 4) consideration of the selected BMPs' applicability to regulation and general permit provisions, and 5) an analysis of the effectiveness of BMPs included within the two previous permitting cycles.

2.2 PUBLIC EDUCATION AND OUTREACH SUMMARY

The Public Education and Outreach Minimum Measure is organized to identify the following:

1. How individuals, households and other stakeholders will be informed about the steps that they can take to reduce stormwater pollution,
2. How individuals, households and other stakeholders will be informed on how they can become involved in MDOT's stormwater management program,
3. Specific mechanisms that will be used to reach target audiences, and
4. Who the target audiences are for the education programs specified in the education related BMPs.

Targeted audiences are selected based on the regulation requirements and on the stated goal of educating the community about the impacts of contaminated stormwater discharges on local water bodies and on entire watersheds. The Public Education and Outreach program and other BMPs, in combination, are expected to be within reach of the constituents within the MS4's permitted boundary over the life of the permitting cycle.

The targeted pollutant sources are sediments generated from construction areas, illicit discharges including litter, hazardous materials potentially transported on roadways, and household hazardous materials. Other targeted pollutants may be of local concern and include specific issues identified within approved TMDLs, 303(d) reports and other regulatory documents.

Evaluations of success of specific BMPs will be established through careful analysis of the measurable goals for each BMP included within the Public Education and Outreach minimum measure. Each BMP will have a specific measurable goal that is established by discernment of attainable goals for the various BMP implementation steps and the capacity of responsible divisions within the context of financial and human resources to effectively meet stated goals.

2.3 PUBLIC EDUCATION AND OUTREACH BEST MANAGEMENT PRACTICES

2.3.1 MATERIALS FOR DIRECT DISTRIBUTION

MDOT will develop and disseminate materials for the purpose of educating the public on stormwater quality issues related to the development and maintenance of transportation systems and networks in Mississippi. Specific to education materials development and distribution, MDOT will:

- A. Review the existing list of subjects and update, modify, or edit as warranted to ensure that intended messages are part of the Public Education and Outreach Program Element,
- B. Distribute the remainder of existing materials prior to making changes and producing new materials,
- C. Review the distribution location list for relevance, appropriateness and quantities of materials taken from each location. The list of locations will be modified based on the above mentioned parameters,
- D. Review and update the existing materials posting schedule to ensure that it is consistent with the implementation of other BMPs included in the revised SWMP,
- E. Post materials at selected locations in accordance with the identified schedule,
- F. Maintain and document records of the quantity of materials posted and taken from each location, and
- G. Include the number of selected locations and quantities of materials posted in its annual report to MDEQ.

2.3.1.1 RATIONALE STATEMENT

Distribution of educational materials to the general public has been a long-standing practice at MDOT. We select materials that target a wide range of demographics in Mississippi and know that the materials and messages distributed are very widely accepted.

2.3.1.2 MEASURABLE GOAL

In the previous permitting cycle, MDOT distributed on average, 200,000 items through our education and materials distribution program. MDOT's goal is to again distribute 200,000 items through the permitting cycle.

2.3.2 STORMWATER QUALITY WEBSITE

MDOT will continue to maintain the section of the www.gomdot.com website to educate the public on water quality issues and to provide a mechanism to receive feedback from the public on water quality issues of concern. Through this BMP, MDOT will

- A. Review the existing list of subjects and update, modify, or edit as warranted to ensure that intended messages are part of the Public Education and Outreach Program Element,

- B. Post new information to the website based on an identified schedule and based on the availability of new information,
- C. Maintain records of website traffic specific to the stormwater pages using a sign-in log or hit counter, and
- D. Report website traffic in its annual report to MDEQ.

2.3.2.1 RATIONALE STATEMENT

The GOMDOT website is utilized by the general public, contractors, industry, and business to obtain traffic information and other news related to transportation and transportation infrastructure in Mississippi. It is an effective, efficient, and low-cost means of communicating stormwater and water quality information.

2.3.2.2 MEASURABLE GOAL

The GOMDOT website averages 40,054 hits per month. The number of GoMDOT.com visitors access Litter Prevention Education Information averages 464 hits per month. Likewise, the number of GoMDOT.com visitors accessing Stormwater Specific information averages 133 per month. MDOT’s goal is to maintain this level of website traffic through the current permitting cycle.

2.3.3 PUBLIC SERVICE ANNOUNCEMENTS

MDOT has a number of public service announcements (PSAs) that focus on the impacts of stormwater runoff on local water bodies and steps the public can take to reduce stormwater pollution. These PSAs are aired through a variety of media and include subjects such as anti-littering campaigns and general stormwater quality issues. During this five-year permitting cycle, MDOT will:

- A. Review existing PSAs to ensure that they are relevant to current stormwater and water quality issues,
- B. Develop new or modify existing PSAs as needed to ensure relevancy,
- C. Continue to broadcast PSAs through local broadcast media, radio stations, and other venues,
- D. Maintain records of the type of PSAs and the frequency of broadcasting as well as the specific markets in which PSAs are aired, and
- E. Report the type of PSAs and the frequency of broadcasting in its annual report to MDEQ.

2.3.3.1 RATIONALE STATEMENT

Public service announcements allow us to reach a very broad audience and have the flexibility necessary to present a variety of subject matters.

2.3.3.2 MEASURABLE GOAL

MDOT typically runs 8-10 PSAs each year including print, radio, and television PSAs. These are printed or aired locally multiple times throughout the year. MDOT's goal is to again run 8-10 PSAs per year.

2.3.4 IMPACTS OF ILLEGAL DUMPING AND LITTERING

Educating the public on the impacts of illegal dumping and littering is critical to ensure the cleanliness and beauty of Mississippi's transportation corridors. MDOT has developed successful education materials and programs that focus on the harmful impacts of illegal dumping and littering and that provide mechanisms for the public to report incidents of dumping and littering. To further insure the success of this program, MDOT will:

- A. Update existing information on illegal dumping and littering that is currently part of existing public education materials to ensure relevance to current issues,
- B. Continue to distribute public education materials that describe the harmful impacts of dumping and littering on local water bodies based on prescribed distribution schedules,
- C. Maintain records on the quantity and type of public education materials that focus on the harmful impacts of illegal dumping and litter, and
- D. Report the quantity and type of illegal dumping and littering educational materials distributed in its annual report to MDEQ,

2.3.3.1 RATIONALE STATEMENT

Litter is one of MDOT's primary contaminants of concern. Education on the impacts of litter on water quality is critical to reducing littering on our roadways and highways.

2.3.4.2 MEASURABLE GOAL

MDOT's goal is to distribute 200,000 individual items with litter control messages to the general public.

2.3.5 PUBLIC EDUCATION ON CONSTRUCTION ACTIVITIES AND NEW DEVELOPMENT ACTIVITIES

MDOT has active construction taking place in the form of new projects or system maintenance almost continuously. Because of the frequency of construction activities, it is important that MDOT has a mechanism in place to inform the public on existing or pending construction activities and to identify steps that the public can take to report potential construction site runoff problems. During this five-year Permitting Cycle, MDOT will:

- A. Update existing educational materials that focus on the mechanisms for notifying the public of existing or pending construction projects that the procedures for identifying and reporting potential situations that could lead to water quality impairment,
- B. Distribute these materials based on a prescribed distribution schedule,

- C. Maintain records of the quantity and type of construction related public education materials distributed, and
- D. Report the quantity and type of construction related public education materials distributed in its annual report to MDEQ.

2.3.5.1 RATIONALE STATEMENT

MDOT engages in multiple construction projects each year. By educating the public on potential water quality impacts of construction activities, they are more likely to report an issue or concern.

2.3.5.2 MEASURABLE GOAL

During the previous permitting cycle, MDOT distributed, on average, 150 press releases to the general public directly related to construction and new development activities. MDOT will continue to include language about erosion control and stormwater pollution prevention in press releases during this new permitting cycle. In addition, MDOT also has held and will continue to hold public meetings where the public is notified about pending construction projects.

2.3.6 EDUCATION OF SCHOOL CHILDREN ON THE IMPORTANCE OF WATER QUALITY

MDOT takes steps to ensure that its education messages are received by a broad audience. One focus group that MDOT attempts to reach with its water quality message is school-aged children. Through its efforts to educate school children, MDOT will:

- A. Review existing programs, presentations and materials targeted towards school children and update to ensure relevancy to current issues,
- B. Continue to use MDOT Anti-litter Coordinators located in each District to educate children on the impacts of litter on the environment,
- C. Make training available to teachers through a hands-on learning program that includes activities related to environmental issues such as water quality and soil erosion,
- D. Maintain records of the quantity of projects conducted under this program, and
- E. Report the quantity of projects conducted under this program in its annual report to MDEQ.

2.3.6.1 RATIONALE STATEMENT

Including school children in our education program ensures we are reaching a broad audience.

2.3.6.2 MEASURABLE GOAL

MDOT's goal is to conduct on average, 100 in-school presentations per year during the permitting cycle.

2.3.7 EDUCATION OF MDOT AND CONTRACTOR PERSONNEL ON EROSION AND SEDIMENT CONTROL ON CONSTRUCTION SITES

In order to ensure that MDOT Construction Supervisors and construction personnel are kept informed on the latest agency policies and procedures specific to sediment and erosion control on construction sites, MDOT has developed educational programs designed to communicate sound principles of sediment and erosion control. To continue this program, MDOT will:

- A. Review and update existing education presentations and programs targeting MDOT and contractor personnel on the proper design, selection, implementation and maintenance of erosion and sediment controls on construction sites. Training will be targeted towards MDOT construction projects,
- B. Continue to implement the above mentioned training program for MDOT and contractor personnel multiple times per year, and
- C. Report the quantity of MDOT and Contractor personnel trained in its annual report to MDEQ.

2.3.7.1 RATIONALE STATEMENT

Due to the number and scope of construction projects, it is necessary that our in-house construction supervisors and construction personnel are educated and informed on the latest construction BMPs, inspection procedures and other construction related stormwater issues to allow them to appropriately monitor water quality impacts from construction.

2.3.7.2 MEASURABLE GOAL

MDOT's goal is to provide construction related stormwater training to 100% of our construction personnel during the five-year permitting cycle.

Table 2.0 Public Education and Outreach Program – Implementation Schedule and Responsibility

Control Measures and Measurable Goals	Implementation Schedule					Responsibility					
	Year 1	Year 2	Year 3	Year 4	Year 5	Construction	Environmental	Maintenance	Public Affairs	Roadway Design	Other
2.3.1 Materials for Direct Distribution											
A. Review and update the existing topics to be addressed through educational materials development and distribution	■								●		
B. Distribute the remainder of existing materials	■	■	■	■	■				●		
C. Review and update the distribution location list	■	■	■	■	■				●		
D. Review and update the materials posting schedule	■	■	■	■	■				●		
E. Post materials at selected locations in accordance with the identified schedule	■	■	■	■	■				●		
F. Maintain and document records of the quantity of materials distributed	■	■	■	■	■				●		
G. Report on the quantity of materials distributed in the annual report	■	■	■	■	■				○	●	
2.3.2 Stormwater Quality Website											
A. Review and update the existing topics to be included on the website	■								●		○
B. Post new information to the website based on identified schedules and availability of new information	■	■	■	■	■				●		○
C. Maintain records of website traffic specific to stormwater pages	■	■	■	■	■				●		○
D. Report website traffic in the annual report	■	■	■	■	■				○	●	○
2.3.3 Public Service Announcements											
A. Review existing PSAs to ensure relevancy to current issues	■								●		
B. Develop new or modify existing PSAs as needed	■	■	■	■	■				●		
C. Continue to broadcast PSAs through local broadcast media, radio stations and other venues	■	■	■	■	■				●		
D. Maintain records of the types of PSAs and the frequency of broadcasting of PSAs	■	■	■	■	■				●		
E. Report the type and the frequency of broadcasting of PSAs in the Annual Report	■	■	■	■	■				○	●	

Control Measures and Measurable Goals	Implementation Schedule					Responsibility					
	Year 1	Year 2	Year 3	Year 4	Year 5	Construction	Environmental	Maintenance	Public Affairs	Roadway Design	Other
2.3.4 Impacts of Illegal Dumping and Littering											
A. Update existing educational materials on illegal dumping and littering								●	●		
B. Continue to distribute public education materials focused on impacts of dumping and littering								●	●		
C. Maintain records on the quantity and type of materials distributed that focus on dumping and littering								●	●		
D. Report the quantity and type of illegal dumping and littering educational materials in the Annual Report									●	●	
2.3.5 Public Education on Construction Activities and New Development Activities											
A. Update existing educational materials that focus on construction and new developments									●		
B. Distribute construction education materials based on prescribed schedules									●		
C. Maintain records on the number and type of construction related materials distributed									●		
D. Report the quantity and type of construction related public education materials distributed in the Annual Report									●	●	
2.3.6 Education of School Children on the Importance of Water Quality											
A. Review existing programs to ensure relevancy								●	●		
B. Continue the use of Anti-Litter Coordinators in each District to educate school children								●	●		
C. Make training available to teachers using hands-on learning programs related to environmental issues								●	●		
D. Maintain records of the quantity of projects conducted under this program								●	●		
E. Report the quantity of projects conducted under this program in the Annual Report								●	●	●	
2.3.7 Education of MDOT and Contractor Personnel on Erosion and Sediment Controls on Construction Sites											
A. Review and update existing education presentations and programs for MDOT and contractor personnel and Supervisors						●	●				
B. Continue to implement the MDOT and contractor personnel training on an annual basis						●	●				

Control Measures and Measurable Goals	Implementation Schedule					Responsibility					
	Year 1	Year 2	Year 3	Year 4	Year 5	Construction	Environmental	Maintenance	Public Affairs	Roadway Design	Other
C. Report the quantity of MDOT and Contractor personnel trained in the Annual Report						●	●			●	



Continuing activity, reviewed or revised as needed throughout implementation

One-time activity to develop or implement a measurable goal

- Individual or department to take lead in the development or implementation of an activity.
- ◐ Individual or department to provide strong support in the development or implementation of an activity.
- Individual or department to review and provide comments and guidance during the development or implementation of an activity.

“Other” indicates participation from the Transportation Information and Information Systems Divisions

3.0 PUBLIC INVOLVEMENT

The Public Involvement minimum measure consists of BMPs that focus on creating opportunities for the public to get directly involved in implementation of the MDOT Stormwater Management Program. This minimum measure also creates opportunities for the public to get involved in activities that directly benefit the environment and lead to improvements in water quality.

Through the mechanism of public notices, MDOT will notify the public of opportunities to participate in water quality improvement activities and implementation of the SWMP by:

- A. MDOT will provide public notice of the June Stakeholder Meeting.
- B. Publishing once a notification of opportunities to participate in at least one newspaper of general circulation in the nine counties that make up the MDOT MS4.

3.1 PUBLIC INVOLVEMENT RATIONALE STATEMENT

Each BMP within the Public Involvement Minimum Measure was selected using a process of 1) research of local, state, and federal BMP databases, 2) consideration of local practices with regard to applicability to existing water quality issues, 3) consideration of new practices with regard to economic impacts and impacts of integration into the regulated entity's operation systems, 4) consideration of the selected BMPs' applicability to regulation and general permit provisions, and 5) an analysis of the effectiveness of BMPs included within the two previous five-year plan permitting cycles.

3.2 PUBLIC INVOLVEMENT SUMMARY

The Public Involvement Minimum Measure is organized to identify the following:

1. How individuals, households, and other stakeholders will be notified of and provided opportunities to participate in activities related to the development and implementation of the MDOT Stormwater Management Plan,
2. How stakeholders including ethnic, and economic groups are provided opportunities to participate in the implementation processes and improvement of water quality, and
3. Specific public involvement activities that have relevance within the context of implementation of the SWMP and that provide benefits in terms of improved water quality within local watersheds.

Targeted participants were selected based on the regulation requirements and on the stated goal of creating opportunities for hands-on involvement in the implementation of the SWMP and the improvement of water quality on the local level. The Public Involvement Program and other BMPs, in combination, are expected to reach constituents within the MS4s permitted boundaries over the life of the permitting cycle.

Evaluations of the success of specific Public Involvement BMPs will be established through careful analysis of the measurable goals for each BMP included within the Public Involvement Minimum Measure. Each BMP will have a specific measurable goal

that is established by discernment of attainable goals for the various BMP implementation steps and the capacity of responsible divisions within the context of financial and human resources to effectively meet stated goals.

3.3 PUBLIC INVOLVEMENT BEST MANAGEMENT PRACTICES

3.3.1 STORMWATER MANAGEMENT PLAN COMMITTEE

To ensure efficient implementation of all SWMP goals and objectives, MDOT created a SWMP Committee designed to provide general internal oversight over the implementation of the SWMP. The SWMP Committee is made up of members of various Divisions within MDOT and generally meets on a quarterly basis. In order to continue success of this BMP through this five-year permitting cycle, MDOT will:

- A. Review the list of BMPs which are included in the SWMP and allow local committee review of the following types of items:
 - a. Public education materials;
 - b. Local illicit discharge elimination regulations and investigation methods,
 - c. Construction guidance materials, permitting procedures and inspection procedures;
 - d. Post-construction BMPs and maintenance guidance information; and
 - e. Feedback on good housekeeping and pollution prevention practices and training.

- B. Consider expansion of the SWMP Committee by determining if additional MDOT Divisions should be involved in the process and by providing notification of meetings to the general public through regular notice procedures.

- C. Participate in the Mississippi Basin Management Approach process as applicable through coordination with each appropriate DEQ Basin Committee. Applicable Basin Teams include:
 - a. Basin Team 1: North Independent Streams, Tennessee River and Tombigbee River;
 - b. Basin Team II: Yazoo River;
 - c. Basin Team III: Upper Pearl River, South Independent Streams, and Big Black River; and
 - d. Basin Team IV: Pascagoula River, Coastal Streams, and Lower Pearl River.

A map depicting the location of the above-listed basins may be found here: http://www.deq.state.ms.us/mdeq.nsf/page/WMB_About_BMA?OpenDocument

- D. The SWMP Committee will meet once per quarter year and will generally follow the schedule outlined below. However, dates may change based on scheduling issues with the various participating MDOT Divisions.

1 st Quarter	2 nd Quarter	3 rd Quarter	4 th Quarter
1 st Monday in March	1 st Monday in June	2 nd Monday in September	1 st Monday in December

The The June meeting (second quarterly meeting) serves as the annual public meeting and will be published once per year in local newspapers with general

circulation in each area of the MS4. This second quarterly meeting will be announced via public notice at areas within each MS4.

- E. Record attendance and take minutes at each meeting.
- F. Maintain records of agenda, attendance and minutes for each meeting.
- G. Report the number of meetings and subjects presented in its annual report to MDEQ.

3.3.1.1 RATIONALE STATEMENT

Regular meetings of the Task Force allows opportunities to discuss problems and issues associated with the program and helps to ensure compliance. Having one meeting open to the public provides an opportunity for public participation and input.

3.3.1.2 MEASURABLE GOAL

MDOT's goal is to conduct four task force meetings per year with one being advertised and open to the public.

3.3.2 ADOPT-A-HIGHWAY / ADOPT-AN-INTERCHANGE PROGRAMS

The Adopt-A-Highway program provides an innovative solution to our state's highway litter problem by providing private and civic organizations with the opportunity to become involved in the preservation of Mississippi's natural beauty. Through the program, a private or civic group adopts at a minimum, a one-mile segment of Mississippi highway and provides manpower to remove litter from the segment right-of-way on a regular basis. In turn, MDOT provides a road sign with the organization's name. MDOT also provides logistical support during litter collection activities such as providing trash bags, gloves, safety vests, and "workers ahead" signs. Once cleanup activities have concluded, MDOT collects the full trash bags for proper disposal.

In similar fashion, the Adopt-An-Interchange program allows municipalities the opportunity to showcase their civic pride by adopting an interchange located within their city. Through the adoption program, the adopting municipality agrees to perform certain maintenance functions at the interchange including regular mowing, litter collection, and planting and landscape management. In turn, MDOT provides municipalities with trash bags, safety vests and "workers ahead" signs. MDOT also provides for the placement of specially designed Mississippi logo signs at the interchange as an indication of the participating municipality's commitment to excellence. To ensure continued success of these programs through this five-year permitting cycle, MDOT will:

- A. Identify target highways, highway segments, or interchanges to include in the Adopt-A-Highway or Adopt-An-Interchange Programs. The identification of targeted highways or interchanges will focus on highways, segments or interchanges not currently adopted and those that have been developed as part of construction activities taking place since the beginning of the first five-year permitting cycle;
- B. Seek to identify additional local public, private, or civic organizations that may be interested in program participation;

- C. Review and update as needed, existing guidelines and schedules for Adopt-A-Highway and Adopt-An-Interchange cleanup events;
- D. Invite identified groups to participate in the Adopt-A-Highway and Adopt-An-Interchange Programs;
- E. Form adoption agreements with groups willing to participate in the programs;
- F. Provide the necessary support to the volunteer groups for cleanup and/or maintenance activities;
- G. Maintain records of the number of highway segments and/or interchanges under adoption, the number of cleanup or maintenance events conducted and the volume of litter removed at each event; and
- H. Report on the number of highway segments and/or interchanges under adoption, the number of cleanup or maintenance events conducted and the volume of litter removed in aggregate in its annual report to MDEQ.

3.3.2.1 RATIONALE STATEMENT

The Adopt-A-Highway and Adopt-An-Interchange programs allow the public to be directly involved in protecting water quality by removing litter that will potentially enter streams and rivers.

3.3.2.2 MEASURABLE GOAL

MDOT currently has 576 groups participating in the program statewide with a total of 604 adopted highway sections or interchanges. In 2015, these groups collected a total of 5,665 bags of trash. MDOT's goal is to maintain and promote this program during this five year permitting cycle.

Table 3.0 Public Information Program – Implementation Schedule and Responsibility

Control Measures and Measurable Goals	Implementation Schedule					Responsibility					
	Year 1	Year 2	Year 3	Year 4	Year 5	Construction	Environmental	Maintenance	Public Affairs	Roadway Design	Other
3.3.1 Stormwater Management Plan Committee											
A. Review the list of BMPs that would benefit from review and oversight by the SWMP Committee	■					●	●	●	●	●	
B. Consider expansion of the SWMP Committee	■					●	●	●	●	●	
C. Participate in the Mississippi Basin Management Approach Process	■	■	■	■	■		●			●	
D. Conduct Quarterly Meetings according to the prescribed meeting schedule	■	■	■	■	■	●	●	●	●	●	
E. Record attendance and take minutes at each meeting	■	■	■	■	■	●	●	●	●	●	
F. Maintain records of agenda, attendance, and minutes for each meeting	■	■	■	■	■	●	●	●	●	●	
G. Report the number of meetings and subjects presented in the Annual Report	■	■	■	■	■	●	●	●	●	●	
3.3.2 Adopt-A-Highway / Adopt-An-Interchange Programs											
A. Identify target highways, segments and interchanges with a focus on those newly developed or currently not adopted	■					○	○	●			●
B. Identify potential participating groups or organizations	■					●	●	●		●	●
C. Review and update existing guidelines and schedules for cleanup and maintenance events	■							●			●
D. Invite identified groups to participate	■	■	■	■	■			●			●
E. Form adoption agreements with groups willing to participate in the programs	■	■	■	■	■			●			●
F. Provide the necessary support to the volunteer groups for cleanup and/or maintenance activities	■	■	■	■	■			●			●
G. Maintain records of program activities	■	■	■	■	■			●			●
H. Report program activities conducted in the Annual Report	■	■	■	■	■			●	●	●	●



Continuing activity, reviewed or revised as needed throughout implementation

One-time activity to develop or implement a measurable goal

- Individual or department to take lead in the development or implementation of an activity.
- Individual or department to provide strong support in the development or implementation of an activity.
- Individual or department to review and provide comments and guidance during the development or implementation of an activity.

“Other” indicates participation from the District Anti-Litter Coordinators.

4.0 ILLICIT DISCHARGE DETECTION AND ELIMINATION

The Illicit Discharge Detection and Elimination Minimum Measure consists of BMPs that focus on the detection and elimination of illicit discharges into the MS4. An illicit discharge is defined as any discharge to an MS4 that is not composed entirely of stormwater except those discharges pursuant to an NPDES permit (other than the NPDES permit for discharges from the MS4) and those non-stormwater discharges identified as expressly exempt from these requirements.

4.1 ILLICIT DISCHARGE DETECTION AND ELIMINATION RATIONALE STATEMENT

Each BMP within the Illicit Discharge Detection and Elimination Minimum Measure was selected using a process of 1) research of local, state, and federal BMP databases, 2) consideration of local practices with regard to applicability to existing water quality issues, 3) consideration of new practices with regard to economic impacts and impacts of integration into the regulated entity's operation systems, 4) consideration of the selected BMP's applicability to regulation and the general permit provisions, and 5) an analysis of the effectiveness of BMPs included within the two previous five-year permitting cycles.

4.2 ILLICIT DISCHARGE DETECTION AND ELIMINATION SUMMARY

The Illicit Discharge Detection and Elimination Minimum Measure is organized to identify the following:

1. Methods, procedures and protocols for mapping the MS4 conveyance systems, major road crossings and incidents of illicit discharge and illegal dumping within the MS4 transportation route rights-of-way;
2. Methods, procedures and protocols for conducting, reporting and documenting dry-weather screening inspections in the MS4;
3. Methods, procedures and protocols for identifying, reporting and mitigating illegal dump sites; and
4. Procedures for educating and training agency employees on the proper methods, procedures and protocols for successful BMP implementation.

Evaluations of the success of specific BMPs will be established through careful analysis of the measurable goals for each BMP included within the Illicit Discharge Detection and Elimination Minimum Measure. Each BMP will have a specific measurable goal that is established by discernment of attainable goals for the various BMP implementation steps and the capacity of responsible divisions within the context of financial and human resources to effectively meet stated goals.

4.3 *ILLICIT DISCHARGE DETECTION AND ELIMINATION BEST MANAGEMENT PRACTICES*

4.3.1 MAINTAIN THE MS4 AND OUTFALL INVENTORY

During the second five-year Permitting Cycle, MDOT began the process of collecting and assembling spatial data depicting the distribution of the MS4's conveyance systems and outfalls. Data integrated during the second five-year permitting cycle included MS4 receiving streams, stormwater outfalls and permit coverage areas and is continually updated. To effectively continue the efforts of mapping the MS4s, MDOT will:

- A. Update maps to reflect new transportation routes as they are developed.
- B. Update maps as new data becomes available. Examples of new data to be incorporated into the maps include: sub-watershed boundaries, pollutants of concern, impaired waterways, locations of TMDL regulated stream segments and other data pertinent to stormwater management and water quality.
- C. Update the 303(d) and TMDL shapefiles following the same schedule as MDEQ uses to update the data and lists.

4.3.1.1 RATIONALE STATEMENT

Required by the General Permit (Act 5, 3(B)).

4.3.1.2 MEASURABLE GOAL

MDOT's goal is to update the 303(d) shapefiles on a one year or two year basis.

4.3.2 MDOT DRY-WEATHER OUTFALL INSPECTIONS

During the initial permitting cycle, MDOT began the process of conducting routine dry-weather screening inspections throughout the designated MS4s. Because of the large size of MDOT's program coverage area and the primary function of the agency, the consistent implementation of the dry-weather screening process was difficult to implement. Since dry-weather screening is also conducted by the thirty-two Phase II regulated cities and counties in Mississippi, there exists a level of duplication of effort with respect to dry-weather screening. In an effort to make the process and results more efficient and effective, MDOT will:

- A. Conduct an intensive training program targeting all agency field supervisory employees. Training will specifically address the identification, reporting, documentation, and mitigation of illicit discharges. Training will be conducted within each MDOT District one time per year (See Section 3.11.3 for additional details).
- B. Address illicit discharges that encroach upon MDOT rights-of-way as required in MDOT Rule #941-7501-09015, "Removal of Encroachments from Highway Rights-of-Way.
- C. Conduct follow-up inspections of non-stormwater discharges identified and reported.

- D. Document the number of outfalls screened and the number of non-stormwater discharges identified and reported on in its annual report to MDEQ.

4.3.2.1 RATIONALE STATEMENT

Dry weather screening allows the permittee to identify and effectively address issues as they are identified. MDOT trains maintenance staff annually in dry weather screening and illicit discharge detection, Dry weather screening and illicit discharge detection activities are conducted during the course of routine maintenance by field staff.

4.3.2.2 MEASURABLE GOAL

MDOT's goal is to respond to complaints and notifications of illicit discharges within two business days in accordance with our internal complaint tracking system.

4.3.3 ILLICIT DISCHARGE EMPLOYEE TRAINING

MDOT is promoting a modified BMP for conducting dry-weather screening. The successful implementation of the dry-weather screening BMP will rely heavily on properly trained personnel. To ensure that training is properly developed and implemented, MDOT will:

- A. Establish a training schedule that ensures that each MDOT District Office receives training at least once per year.
- B. Implement the training schedule as established. The training schedule for year one will include training at all district offices. Training in subsequent years will include refresher training and training of new employees.
- C. Report on the number of training sessions conducted annual as well as the number of employees trained in its annual report to MDEQ.

4.3.3.1 RATIONALE STATEMENT

Required by Act 9 of the General Permit.

4.3.3.2 MEASURABLE GOAL

MDOT's goal is to conduct training at each MDOT District Office once per year.

4.3.4 ILLEGAL DUMPING DETECTION AND REPORTING

Similarly to the dry-weather screening process, MDOT desires to minimize incidents of illegal dumping and to maximize the agency's ability to respond, report and mitigate incidents of illegal dumping. To ensure successful achievement of this goal, MDOT will:

- A. Include illegal dumping in the dry-weather screening process and reporting and documentation procedures;
- B. Include illegal dumping identification and reporting in the training for illicit discharges and dry-weather screening; and
- C. Report on the number of illegal dumps identified and reported in its annual report to MDEQ.

4.3.4.1 RATIONALE STATEMENT

Litter and illegal dumping represent the most significant potential impairment originating from state highways. An aggressive illegal dumping detection and reporting program will help keep unwanted materials from entering waterways.

4.3.4.2 MEASURABLE GOAL

MDOT's goal is to respond to reports of illegal dumping within two business days.

Table 4.0 Illicit Discharge Detection and Elimination – Implementation Schedule and Responsibility

Control Measures and Measurable Goals	Implementation Schedule					Responsibility					
	Year 1	Year 2	Year 3	Year 4	Year 5	Construction	Environmental	Maintenance	Public Affairs	Roadway Design	Other
4.3.1 Maintain the MS4 and Outfall Inventory											
A. Update maps with new corridors and transportation routes	■					●	○	●	○		●
C. Update maps to include new data such as sub-watersheds, impaired waterways, locations of TMDLs, etc.	■					●	○	●	○		●
D. Update the 303(d) and TMDL shapefiles consistent with MDEQ's schedule of releasing updated data.	■	■	■	■	■	●	○	●	○		●
E. Report the development or inclusion of new map data in the Annual Report	■	■	■	■	■	●	○	●	○	●	○
4.3.2 MDOT Dry-Weather Outfall Inspections											
A. Conduct employee training on illicit discharges	■	■	■	■	■		○	●			
B. Address illicit discharges as required in MDOT Rule #941-7501-09015	■	■	■	■	■		○	●			
C. Conduct follow-up inspections of non-stormwater discharges detected and reported.	■	■	■	■	■		○	●			○
D. Document the number of outfalls screened and illicit discharges identified in the annual report.	■	■	■	■	■		○	●		●	
4.3.3 Illicit Discharge Employee Training											
A. Establish a training schedule	■							●			
B. Implement the training schedule as established	■	■	■	■	■			●			
C. Report on the number of training sessions conducted and the number of employees trained in the Annual Report	■	■	■	■	■			○		●	
4.3.4 Illegal Dumping Detection and Reporting											
A. Include illegal dumping in the dry-weather screening process and reporting and documentation procedures	■	■	■	■	■		○	●			
B. Implement procedures for removal of illegal dumps within the rights-of-way	■	■	■	■	■	●	○	●			
C. Implement a system to track occurrences of illegal dumping	■	■	■	■	■	●	○	●			○
D. Include illegal dumping identification and reporting in the training for illicit discharges as described in Section 3.11.3	■	■	■	■	■		○	●			
E. Report the number of illegal dumps identified and reported in the Annual Report	■	■	■	■	■			○		●	

■ Continuing activity, reviewed or revised as needed throughout implementation
 ■ One-time activity to develop or implement a measurable goal

- Individual or department to take lead in the development or implementation of an activity.
- Individual or department to provide strong support in the development or implementation of an activity.
- Individual or department to review and provide comments and guidance during the development or implementation of an activity.

“Other” indicates participation and involvement by the Divisions of Transportation Information and Information Systems of MDOT.

Participation from Public Affairs Division with Mapping BMP is limited to the involvement of the Website Coordinator.

5.0 CONSTRUCTION SITE RUNOFF

The Construction Site Runoff Control Minimum Measure consists of BMPs that focus on the reduction of pollutants in stormwater runoff to the MS4 that originate from construction activities that involve land disturbance activities of greater than or equal to one acre. Primary pollutants of concern from construction activities include sediments generated from soil disturbance activities. BMPs selected for this minimum measure are proactive in nature and are designed to minimize occurrences of erosion and the transfer of sediments from construction areas to adjacent waterways, conveyances or outfalls.

5.1 CONSTRUCTION SITE RUNOFF RATIONALE STATEMENT

Each BMP within the Construction Site Runoff Minimum Measure was selected using a process of 1) research of local, state, and federal BMP databases, 2) consideration of local practices with regard to applicability to existing water quality issues, 3) consideration of new practices with regard to economic impacts and impacts of integration into the regulated entity's operation systems, 4) consideration of the selected BMP's applicability to regulation and the general permit provisions, and 5) an analysis of the effectiveness of BMPs included within the two previous five-year permitting cycles. .

5.2 CONSTRUCTION SITE RUNOFF SUMMARY

The Construction Site Runoff Minimum Measure is organized to accomplish the following:

1. To determine the mechanisms which will be used to require erosion and sediment controls on construction sites;
2. To establish enforcement procedures and actions to ensure compliance;
3. To establish requirements for contractors to implement appropriate and site-specific erosion and sediment control BMPs;
4. To establish requirements for contractors to control waste on construction sites such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste;
5. To establish procedures for site plan review that incorporate the consideration of potential water quality impacts;
6. To establish procedures for site inspection and enforcement of control measures; and
7. To establish procedures to provide appropriate education and training for contractors and MDOT personnel overseeing construction operations.

Evaluations of success of specific BMPs will be established through careful analysis of the measurable goals for each BMP included within the Construction Site Runoff Minimum Measure. Each BMP will contribute toward a measurable goal that is established by discernment of attainable goals for the various BMP implementation steps and the capacity of responsible divisions within the context of financial and human resources to effectively meet stated goals.

5.3 CONSTRUCTION SITE RUNOFF BEST MANAGEMENT PRACTICES

5.3.1 MDOT CONSTRUCTION PERSONNEL EDUCATION

In order to communicate established policies and procedures with respect to construction operations, contractors and MDOT personnel overseeing construction operations must be trained on proper management procedures as well as procedures and protocols for reporting accidental discharges and inspection results. To ensure that contractors and MDOT personnel overseeing construction operations are properly trained, MDOT will:

- A. Review existing construction education and training programs to ensure relevance and to take advantage of new technologies and methods of managing stormwater runoff on construction sites. Education and training programs will be updated and modified as appropriate;
- B. Implement the training program for MDOT and contractor personnel. Training will include all District Offices and will involve all construction related personnel and contractors over the five-year period; and
- C. Report the number of training sessions held and the number of contractor and MDOT personnel trained in its annual report to MDEQ.

5.3.1.1 RATIONALE STATEMENT

Required in Act 9 of the General Permit.

5.3.1.2 MEASURABLE GOAL

MDOT's goal is to provide on training session at each District Office per year.

5.3.2 CONSTRUCTION PLANS REVIEW

MDOT takes a proactive approach to minimizing occurrences of erosion and sediment loss from its construction sites. To be effectively proactive, the construction process must begin with the development of construction plans indicating the proper selection of construction BMPs to ensure that each construction site is addressed in the context of site-specific conditions and that the Stormwater Pollution Prevention Plan (SWPPP) for each construction site is relevant and applicable to site conditions. To accomplish this goal, MDOT will:

- A. Communicate existing policies to contractors that detail the requirements to develop and submit written project and/or site-specific erosion and sediment control plans, including a spill control plan if applicable;
- B. Continue to implement internal tracking and plan review procedures to address the following issues: Conformance to final stormwater guidelines, appropriate use of temporary erosion controls, and inclusion of any required local, state or federal stormwater permit documents. This requires interdivisional communication and cooperation within MDOT to ensure that all divisions active in the construction process provide an appropriate level of review;

- C. Maintain records of plans reviewed and approved for construction under this program; and
- D. Report the number of plans reviewed, approved, and rejected (or remanded for revision) under the plans review program;

5.3.2.1 RATIONALE STATEMENT

Reviewing plans within the context of erosion and sediment control helps ensure the most appropriate treatment train of BMPs is being employed on construction projects as required by MDEQ’s Small Construction General and Large Construction General Permits.

5.3.2.2 MEASURABLE GOAL

MDOT’s goal is to conduct a plan review for every new construction project as required by MDEQ’s Small Construction General and Large Construction General Permits.

5.3.3 CONSTRUCTION INSPECTION PROCEDURES AND STANDARDS

The majority of construction projects undertaken by MDOT are linear in nature and often require the incorporation of construction methods and stormwater BMPs that differ from those used on building construction projects. It is necessary that MDOT have a standard menu from which BMPs can be selected in establishing a treatment-train approach to erosion and sediment control on transportation related construction sites. To further expand and adapt these procedures, MDOT will:

- A. Review evaluate and revise the MDOT construction stormwater guidance to promote consistency with MDEQ “Second Edition 2005 Field Manual for Erosion and Sediment Control on Construction Sites in Mississippi”;
- B. Modify and update inspection procedures based on MDOT construction stormwater guidance that address the following categories: 1) the proper installation of erosion and sediment control BMPs, 2) control of construction related wastes to include sanitary wastes, 3) on-site documentation and records, 4) corrective actions and on-site communication supported by electronic communication, and 5) establishment of standard inspection methodologies to develop consistency among all inspections;
- C. Use the standard methodology on inspection forms to be used for all construction stormwater inspections to comply with MDOT construction stormwater guidance;
- D. Incorporate enforcement language into MDOT construction contracts as needed to promote compliance with MDOT construction stormwater guidance and MDEQ construction permit provisions;
- E. Report whether changes were incorporated into inspection forms and contract documents in the annual report.

5.3.3.1 RATIONALE STATEMENT

Required in Act 5, 4(C)(i and iii) of the General Permit.

5.3.3.2 MEASURABLE GOAL

MDOT's goal is to annually review and update inspection form methodology and contractual language as necessary to be in line with the current MDOT construction stormwater guidance for all projects permitted via MDEQ's Small Construction General and Large Construction General Permits.

5.3.4 CONSTRUCTION SITE INSPECTIONS

The purpose of the inspections is to ensure compliance with MDEQ's Small Construction General and Large Construction General Permits and to ensure that BMPs incorporated into construction projects continue to function as designed. In establishing site inspection methods, MDOT will:

- A. Review existing procedures for internal tracking of new and on-going construction activities and revise as necessary;
- B. Inspect construction sites using appropriate inspection procedures and forms to ensure compliance with MDOT construction stormwater guidance. Inspection schedules will be standardized based on inspection frequency requirements as outlined in the MDEQ construction permit;
- C. Require contractors to conduct regular and routine self-inspections on construction sites in accordance with MDEQ permit requirements;
- D. Require contractors to perform corrective actions at MDOT construction sites when conditions are discovered through inspection processes that are not in compliance with MDOT construction stormwater guidance, construction contract language, and/or MDEQ permit provisions;
- E. Conduct in-house inspections on construction sites in accordance with the current MDOT construction stormwater guidance; and
- F. Maintain records of inspections and corrective actions performed under the inspection program
- G. Report the number of construction site inspections and corrective actions in its annual report to MDEQ.

5.3.4.1 RATIONALE STATEMENT

Required in Act 5, 4(C)(iii) of the General Permit.

5.3.4.2 MEASURABLE GOAL

MDOT's goal is to have the weekly inspections required by MDEQ's Small Construction General and Large Construction General Permits conducted by contractors, and MDOT personnel and MDOT's independent, third party conduct inspections in accordance with the current MDOT construction stormwater guidance.

5.3.5 CONSTRUCTION RELATED PUBLIC REPORTING

The purpose of this BMP is to provide a mechanism for the general public to report stormwater and water quality concerns related to MDOT construction projects. Through this mechanism, MDOT desires to take advantage of an aware populace to provide opportunities to address stormwater and water quality concerns on construction sites

before they become serious water quality issues. To create an environment that encourages public reporting and feedback on construction projects, MDOT will:

- A. Review existing mechanisms for public reporting of stormwater and water quality concerns at MDOT construction sites to include a quantification of the reports received from the public during the previous five years. Mechanisms will be modified if necessary to increase effectiveness.
- B. Ensure that the mechanisms in place address the following items:
 - a. Multiple contact methods for reporting observations that include at a minimum, a construction “hot-line” phone number and a webpage dedicated to providing contact information for reporting concerns, and
 - b. Information required for a complete public report on a potential construction related stormwater quality problem;
- C. Conduct on-site investigations of those sites reported by the public that warrant investigation according to the best judgment of MDOT personnel;
- D. Maintain records on the number of public reports received and responded to; and
- E. Report on the number of public reports received and responded to in its annual report to MDEQ.

5.3.5.1 RATIONALE STATEMENT

This BMP provides a mechanism for public involvement and also increases the chances of identifying a problem or concern related to construction activities.


5.3.5.2 MEASURABLE GOAL

MDOT’s goal is to respond to public complaints or notifications from the public within two business days.

Table 5.0 Construction Site Runoff – Implementation Schedule and Responsibility

Control Measures and Measurable Goals	Implementation Schedule					Responsibility					
	Year 1	Year 2	Year 3	Year 4	Year 5	Construction	Environmental	Maintenance	Public Affairs	Roadway Design	Other
5.3.1 MDOT Construction Personnel Education											
A. Review existing training programs and modify if necessary	■					○	●				
B. Implement training for all construction personnel during the five-year permitting cycle.	■	■	■	■	■	○	●				
C. Report the number of training sessions held and the number of people trained in the Annual Report	■	■	■	■	■	○	●			●	
5.3.2 Construction Plans Review											
A. Provide communication to construction participants on the submittal requirements for written erosion control plans	■					○	●			○	
B. Implement internal tracking and plan review procedures	■	■	■	■	■	○	●			○	
C. Maintain records of plans reviewed and approved for construction	■	■	■	■	■	○	●			○	
D. Report the number of plans reviewed, approved or remanded for revision in the Annual Report	■	■	■	■	■	○	○			●	
5.3.3 Construction Inspection Procedures and Standards											
A. Review, evaluate and revise if necessary, the MDOT construction stormwater guidance	■					○	●			○	
B. Modify and update inspection procedures based on MDOT construction stormwater guidance.	■	■	■	■	■	○	●				
C. Use standard methodology on inspection forms to be used for all construction stormwater inspections	■	■	■	■	■	○	●				
D. Incorporate enforcement language into construction contract documents	■	■	■	■	■	●	○			○	
E. Report whether changes were incorporated into inspection forms and contract documents	■	■	■	■	■	○	○			●	
5.3.4 Construction Site Inspections											
A. Review existing procedures for tracking of new and ongoing construction activities and revise as necessary	■					○	●			○	○
B. Inspect construction sites using appropriate forms and procedures based on established inspection schedules	■	■	■	■	■	○	●				○
C. Require contractors to conduct regular and routine self-inspections on construction sites	■	■	■	■	■	○	●				○
D. Require contractors to perform corrective actions when conditions are discovered that are non-compliant	■	■	■	■	■	○	●				○
E. Conduct in-house inspections on construction sites in accordance with current MDOT construction stormwater guidance	■	■	■	■	■	○	●				○
F. Maintain records of inspections and corrective actions performed under the inspection program	■	■	■	■	■	○	●				○
G. Report the number of construction site inspections and corrective actions in the Annual Report	■	■	■	■	■	○	○			●	

Control Measures and Measurable Goals	Implementation Schedule					Responsibility					
	Year 1	Year 2	Year 3	Year 4	Year 5	Construction	Environmental	Maintenance	Public Affairs	Roadway Design	Other
5.3.5 Construction Related Public Reporting											
A. Review and revise existing mechanisms for public reporting of stormwater quality concerns at construction sites						●			●		
B. Ensure that mechanisms include multiple contact methods and detailed requirements for full and correct reporting						●			●		
C. Review existing internal tracking systems used to process public reports and revise if necessary						●			●		
D. Conduct on-site investigations of those sites reported by the public						●	●				
E. Maintain records of public reports of construction stormwater quality concerns						●	●				
F. Report the number of public reports received and responded to in the Annual Report						●	●		○	●	

 Continuing activity, reviewed or revised as needed throughout implementation

 One-time activity to develop or implement a measurable goal

- Individual or department to take lead in the development or implementation of an activity.
- Individual or department to provide strong support in the development or implementation of an activity.
- Individual or department to review and provide comments and guidance during the development or implementation of an activity.

“Other” indicates participation and involvement by the Districts and LPA and Transportation Information Divisions of MDOT.

6.0 POST-CONSTRUCTION SITE RUNOFF

The Post-construction Stormwater Runoff Minimum Measure consists of BMPs that focus on the prevention or minimization of water quality impacts from new developments and redevelopments once construction activities are completed. Because MDOT construction projects involve the creation of impervious surfaces, it is important to ensure that the runoff originating from these surfaces does not create erosion or other stormwater quality concerns. BMPs incorporated into this minimum measure are designed to ensure that appropriate reviews are conducted and that pre-construction conditions relative to affected waterways or streams are taken into consideration during the design, construction and post-construction phases.

6.1 POST-CONSTRUCTION SITE RUNOFF RATIONALE STATEMENT

Each BMP within the Post-Construction Site Runoff Minimum Measure was selected using a process of 1) research of local, state, and federal BMP databases, 2) consideration of local practices with regard to applicability to existing water quality issues, 3) consideration of new practices with regard to economic impacts and impacts of integration into the regulated entity's operation systems, 4) consideration of the selected BMP's applicability to regulation and the general permit provisions, and 5) an analysis of the effectiveness of BMPs included within the two previous five-year permitting cycles.

6.2 POST-CONSTRUCTION SITE RUNOFF SUMMARY

The Post-Construction Site Runoff Minimum Measure is organized to identify the following:

1. Mechanisms that will be used to address post-construction runoff from new development and redevelopment projects,
2. Procedures to ensure that potentially affected sensitive and/or impaired water bodies including those with adopted TMDLs are taken into consideration during the design and implementation of post-construction BMPs,
3. Opportunities for interagency cooperation and communication is conducted in a manner that ensures a high probability of successful implementation of post-construction BMPs, and
4. Policies and procedures for long-term inspection and maintenance of post-construction BMPS.

Evaluations of success of specific BMPs will be established through careful analysis of the measurable goals for each BMP included within the Post-Construction Runoff Minimum Measure. Each BMP will have a specific measurable goal that is established by discernment of attainable goals for the various BMP implementation steps and the capacity of responsible divisions within the context of financial and human resources to effectively meet stated goals.

6.3 POST-CONSTRUCTION SITE RUNOFF BEST MANAGEMENT PRACTICES

6.3.1 PROTECTION OF SENSITIVE AND/OR IMPAIRED WATER BODIES

To assist in the effective review of post-construction BMPs to be implemented on development and/or redevelopment projects, a review of the potential impacts to potentially impacted water bodies, streams, or conveyances will be conducted during the plans review process for all development and redevelopment projects within the MS4. To ensure complete and accurate review and consideration of potentially impacted water bodies, streams or conveyances relative to development or redevelopment projects, MDOT will:

- A. During the project planning and design stage, conduct a review of the most current 303(d) listing of impaired streams and MDEQ's database of TMDLs to determine potential impacts to water bodies with existing environmental concerns or existing regulatory mechanisms. In addition, if it is determined that post-construction BMPs are necessary to protect a water body potentially impacted by post-construction conditions, those BMPs will be planned, designed, included, and implemented during the design and construction stages of the project.
- B. Research, on a case-by-case basis, potential opportunities for control measures designed to reduce the discharge of targeted pollutants to sensitive or impaired water bodies. Priority will be placed on selection of vegetative control measures such as sodding and seeding.
- C. Take appropriate steps during the project design and review processes to preserve riparian buffers and native vegetation near impaired water body crossings.
- D. Develop and implement site specific strategies necessary to comply with EPA approved TMDLs for streams within the permitted area.
- E. As part of an EA and FONSI proposed project segments that have the potential to impact sensitive or impaired water bodies are identified. Identification of sensitive or impaired water bodies will be conducted through the review and internal distribution of approved TMDLs, the most current 303(d) report, and any existing Watershed Implementation Plans (WIPs) that exist within the MS4.
- F. Report activities conducted under this program focusing on the protection of impaired water bodies in its annual report to MDEQ.

6.3.1.1 RATIONALE STATEMENT

Proactive planning conducted by MDOT will serve to minimize water quality issues associated with post-construction conditions.

6.3.1.2 MEASURABLE GOAL

MDOT's goal is to conduct appropriate levels of review on each project subject to MDEQ's Small Construction General and Large Construction General Permits. This level of review will focus primarily on planned post construction conditions.

6.3.2 PARTICIPATION IN LOCAL WATERSHED PLANNING AND MODELING

MDOT has sought out opportunities to participate in MDEQ's basin approach and is on record as a stakeholder in the basin approach process. Through this process, both agencies have opportunities to share information critical to efforts to restore water quality throughout the state and to ensure that new projects are designed and implemented in a manner that protects water quality within the MS4. To continue this effort of interagency cooperation, MDOT will:

- A. Continue to participate as an active stakeholder in the MDEQ basin management approach process by participating in planning meetings, and by continuing to communicate water quality management efforts within the basin management process.
- B. Ensure that existing water quality status databases including the 303(d) list and existing or draft TMDLs are reviewed and considered during the project design and planning process.
- C. Maintain records of any TMDL requirements and pollutants of concern for any MDOT MS4 receiving streams that are considered sensitive or impaired.
- D. Review TMDL requirements or pollutant load allocations to determine if additional BMPs or changes in existing practices are warranted to meet TMDL local allocations or to protect sensitive or impaired water bodies.
- E. Make presentations in order to assist in local watershed protection efforts or to meet TMDL load allocations.
- F. Report on the number of watershed planning meetings attended and any associated changes in the menu of BMPs in its annual report to MDEQ.

6.3.2.1 RATIONALE STATEMENT

Interagency communication and cooperation helps MDOT stay up to date on events, programs, and policies related to water quality and stormwater management. By participating in the basin team meetings, MDOT personnel have a mechanism to communicate and share knowledge with other agencies.

6.3.2.2 MEASURABLE GOAL

MDOT's goal is to have one staff person in attendance at each basin team meeting.

Table 6.0 Post-Construction Site Runoff – Implementation Schedule and Responsibility

Control Measures and Measurable Goals	Implementation Schedule					Responsibility					
	Year 1	Year 2	Year 3	Year 4	Year 5	Construction	Environmental	Maintenance	Public Affairs	Roadway Design	Other
6.3.1 Protection of Sensitive and/or Impaired Water Bodies											
A. Conduct a review of the most current 303(d) list and approved TMDLs to determine potential impacts from projects							●			●	
B. Research, on a case-by-case basis, opportunities for reduction of discharges of targeted pollutants to impaired streams							●			●	
C. Take steps during the project design and review process to preserve riparian buffers and native vegetation						○	○			●	○
D. Develop and implement site-specific strategies to comply with approved TMDL load limits						○	○	○		●	○
E. As part of an EA and FONSI proposed project segments that have the potential to impact sensitive or impaired water bodies are identified							●			●	○
F. Report activities conducted under this program in the Annual Report						○	○			●	
6.3.2 Participation in Local Watershed Planning and Modeling											
A. Continue to participate in the MDEQ Basin Management Approach Process							●			○	
B. Review existing 303(d) lists and draft and/or adopted TMDLs during the project planning/design process							●			○	○
C. Maintain records of TMDL requirements and pollutants of concern for receiving streams considered impaired							●			○	○
D. Review TMDL requirements or pollutant load allocations to determine appropriate BMP applications							●			○	
E. Make presentations to assist in local watershed protection efforts when needed							●			○	
F. Report the number of watershed planning meetings attended and BMP changes in the Annual Report							○			●	

Continuing activity, reviewed or revised as needed throughout implementation
 One-time activity to develop or implement a measurable goal

- Individual or department to take lead in the development or implementation of an activity.
- Individual or department to provide strong support in the development or implementation of an activity.
- Individual or department to review and provide comments and guidance during the development or implementation of an activity.

“Other” indicates participation from Information Systems, Hydraulics and Transportation Information Divisions.

7.0 POLLUTION PREVENTION / GOOD HOUSEKEEPING

The Pollution Prevention / Good Housekeeping Minimum Measure consists of BMPs that focus on the reduction of pollutants in stormwater runoff that originate from MDOT operations and maintenance activities. The operations and maintenance activities include transportation system maintenance, vehicle and equipment maintenance, and materials handling and storage. BMPs selected for this minimum measure are intended to be proactive in nature and focus primarily on prevention of circumstances that have the potential to contribute to polluted runoff.

7.1 POLLUTION PREVENTION / GOOD HOUSEKEEPING RATIONALE STATEMENT

Each BMP within the Pollution Prevention / Good Housekeeping Minimum Measure was selected using a process of 1) research of local, state, and federal BMP databases, 2) consideration of local practices with regard to applicability to existing water quality issues, 3) consideration of new practices with regard to economic impacts and impacts of integration into the regulated entity's operation systems, 4) consideration of the selected BMP's applicability to regulation and the general permit provisions, and 5) an analysis of the effectiveness of BMPs included within the two previous five-year plan permitting cycles.

7.2 POLLUTION PREVENTION / GOOD HOUSEKEEPING SUMMARY

The Pollution Prevention / Good Housekeeping Minimum Measure is organized to identify the following:

1. Procedures and schedules for transportation system maintenance to include general maintenance activities, street sweeping, litter and debris collection on roadways, and herbicide application,
2. Procedures for vehicle and equipment maintenance,
3. Procedures for storage and handling of materials at MDOT maintenance facilities to include hazardous materials management and spill prevention planning, and
4. Opportunities for employee training on proper good housekeeping and pollution prevention procedures.

Evaluations of success of specific BMPs will be established through careful analysis of the measurable goals for each BMP included within the Pollution Prevention / Good Housekeeping Minimum Measure. Each BMP will have a specific measurable goal that is established by discernment of attainable goals for the various BMP implementation steps and the capacity of responsible divisions within the context of financial and human resources to effectively meet stated goals.

7.3 POLLUTION PREVENTION / GOOD HOUSEKEEPING BEST MANAGEMENT PRACTICES

7.3.1 MAINTENANCE OF ROADWAYS

Routine maintenance activities on MDOT's roadway system has the potential to contribute to polluted runoff. Examples of pollutants of concern include metals, asphalt and asphalt related materials, chemicals, and sediments collected on roadways and shoulders. MDOT is committed to minimizing the potential impacts from roadway maintenance when practicable, MDOT will:

- A. Maintain records of road maintenance activities and any issues that may impact stormwater quality, and
- B. Report on roadway maintenance activities and the use of any alternative maintenance practices if any in its annual report to MDEQ.

7.3.1.1 RATIONALE STATEMENT

Routine maintenance of roadways provides an opportunity to address potential contaminants before they enter waterways.

7.3.1.2 MEASURABLE GOAL

MDOT personnel are continually reviewing roadway issues and drainage conditions. MDOT's goal is to maintain this review since it is done on a frequent basis and will be ongoing.

7.3.2 STREET SWEEPING

Street sweeping is an effective method of reducing the amount of sediment and associated pollutants discharged from roadways. Currently, MDOT conducts street sweeping activities on an as-needed basis with some of the work being done on a contractual basis. To ensure that street sweeping activities are conducted in an efficient and effective manner, MDOT will:

- A. Identify roadway segments that are to be swept to remove sediments and other pollution. Roadways to be swept are typically those with curb and gutter design.
- B. Establish schedules and implement regular street sweeping of identified roadways.
- C. Determine average man-hours per roadway section and determine if adjustments in scheduling would provide optimized pollutant removal.
- D. Maintain records of roadway sections and the associated man-hours utilized in sweeping those sections.
- E. Adjust sweeping schedules according to program assessment on an annual basis.
- F. Report the roadway sections swept and man-hours utilized to sweep those sections.

7.3.2.1 RATIONALE STATEMENT

Regular and routine street sweeping removes contaminants before they have an opportunity to enter the conveyance system.

7.3.2.2 MEASURABLE GOAL

MDOT's goal is to sweep 80-90% of the shoulder miles of areas of curb/gutter, bridges and urban interstates.

7.3.3 LITTER AND DEBRIS REMOVAL

There are four ways that MDOT removes litter and debris from roadways statewide:

- A. MDOT maintenance staff removes liter and debris from the highway rights-of-way as a part of routine maintenance activities.
- B. MDOT maintains and promotes the Adopt-A-Highway and Adopt-A-Interchange programs in which participating organizations pick up liter on an agreed upon segment of highway or interchange.
- C. MDOT maintains and promotes the Inmate Litter Program in which participating Sheriffs provide inmate labor to pick up litter on designated State routes in their county.
- D. MDOT enters into mowing and litter removal contracts for defined segments of highways.

7.3.3.1 RATIONALE STATEMENT

Regular and routine removal of litter from the highway right preserves the aesthetic quality of the roadway and roadside while enhancing stormwater quality by removing items that could contaminate stormwater and/or enter bodies of water crossing the right-of-way.

7.3.3.2 MEASURABLE GOAL

MDOT's goal is to average under 200 pieces (fist sized objects or larger) of litter or debris per shoulder mile.

7.3.4 HERBICIDE APPLICATION

The use of herbicides can be an effective tool in keeping unwanted vegetation from growing along roadways and medians. However, improper use can have potentially harmful effects on stormwater runoff and water quality. To ensure that the application of herbicides does not contribute to impaired runoff and water quality, MDOT will:

- A. Review and update as necessary the existing inventory of areas designated for herbicide application in urbanized areas to include the following information: areas of application, type of herbicide applied, and the purpose of the application (e.g. type of vegetation to be controlled).
- B. Ensure compliance with local, state, and federal regulations associated with herbicide application, e.g. licensing regulations and requirements.
- C. Review and update as necessary the existing herbicide application schedule.
- D. Assess each location for opportunities to implement alternative practices for non-herbicide methods of maintenance.
- E. Develop a prioritized list of areas where alternative weed and vegetation control practices would reduce overall herbicide application volumes.

- F. Report the total volume of herbicide applied in its annual report to MDEQ.
- G. Require annual training for all personnel involved with herbicides and their application. MDOT maintains an ongoing contract with Mississippi State University Plant and Soil Science Department to provide this training and to insure that all herbicides are tested and manufacturer's recommended rates of application are effective.
- H. As a component of annual training, herbicide labels will be examined and explained to insure that spill containment, storage, and handling terms are easily understood.
- I. MSDS sheets for herbicides are kept on-board the trucks when spraying.
- J. Containment and incident response are always reviewed at training sessions to insure minimal contamination should a spill occur. Storage of herbicides is only allowed in facilities with weather protection and containment measures should a spill occur.
- K. Application equipment will be calibrated to insure that flow and coverage criteria are correct. This is to insure the proper amount of herbicide is being applied in the desired location.
- L. Spray equipment is turned off prior to crossing a bridge, culvert, or other area where open water is located.
- M. Drift control additives and drift reducing nozzles are utilized to minimize drift of herbicide spray.
- N. Careful monitoring of weather conditions will be required to stay within the parameters of potential drift due to wind.

7.3.4.1 RATIONALE STATEMENT

Ensuring the proper application of herbicides and pesticides ensures that excess amounts do not enter the MS4 conveyance system, contributing to water quality impairment.

7.3.4.2 MEASURABLE GOAL

MDOT's goal is to use herbicide chemicals in a responsible manner as per the manufacturer's recommendations. Herbicide volumes will be recorded during the calendar year.

7.3.5 VEHICLE MAINTENANCE

MDOT owns and operates a variety of vehicles and equipment used in administration, development and maintenance operations. These vehicles range from passenger vehicles to heavy equipment, all of which requires regular and routine maintenance. Improperly maintained vehicles and equipment have the potential to contribute to water quality impairment through leaking automotive fluids and other vehicle and equipment

related issues. To ensure that MDOT's vehicles and equipment do not contribute to impaired water quality, MDOT will:

- A. Review and update the existing inventory of MDOT owned vehicles and equipment.
- B. Require MDOT vehicle and equipment operators to conduct daily inspections of vehicles to check for fluid leaks and other maintenance issues.
- C. Conduct routine maintenance on all vehicles and equipment according to MDOT standard operating procedure.
- D. During routine maintenance of MDOT owned vehicles and equipment, inspect vehicles for the presence of fluid leaks.
- E. Schedule repairs for vehicles determined to have fluid leaks.
- F. Maintain vehicle maintenance records and document fluid leak repair activities.
- G. Review vehicle and equipment inspection and maintenance records on an annual basis to evaluate conformance to vehicle manufacturer service specifications.
- H. Report the results of the equipment superintendent's checklist for vehicles repaired in its annual report to MDEQ.

7.3.5.1 RATIONALE STATEMENT

Regular and routine maintenance of the MDOT fleet ensures that the fleet does not contribute to water quality impairment through leaking automotive fluids.

7.3.5.2 MEASURABLE GOAL

MDOT's goal is to have all vehicles in the MDOT fleet undergo routine maintenance and inspections on an annual basis or as needed.

7.3.6 CONTINUATION OF THE ENVIRONMENTAL COMPLIANCE PROGRAM

MDOT utilizes third party consultants/contractors to perform environmental compliance assurance inspections at all of its facilities. The scope of work for these inspections includes:

- A. Performing environmental compliance inspections at each MDOT facility at least once annually. Facilities found to be deficient may be subject to a follow-up inspection. A certain number of random inspections are also conducted across the state.
- B. Nominating a facility that showed exceptional adherence to MDOT environmental health and safety procedures for the annual "Top Shop" award.
- C. Performing environmental awareness training for various MDOT personnel such as maintenance shop managers and district supervisors.

- D. Providing on-call services to assist with immediate concerns such as spills, waste characterization and disposal, permitting, or other environmental issues.
- E. Provide on-call services to assist with immediate concerns.
- F. Report the findings of the inspections and remedial actions undertaken in the Annual Report.

7.3.6.1 RATIONALE STATEMENT

Ensuring that all MDOT facilities including maintenance shops, welcome centers, rest stops, weigh stations, and district headquarters are in compliance with general environmental compliance also ensures that they do not contribute to water quality impairment.

7.3.6.2 MEASURABLE GOAL

MDOT's goal is for each MDOT facility to undergo an environmental compliance inspection once per year.

7.3.7 SPILL PREVENTION PLANS

MDOT complies with federal Spill Prevention Control and Counter Measures (SPCC) designed to ensure that spill response procedures consider stormwater quality protection measures. To ensure continued success of this program, MDOT will:

- A. Evaluate each MDOT owned facility and determine if Spill Prevention Control and Countermeasure Plans are required.
- B. Develop, review and maintain SPCC plans for MDOT owned facilities that require plans.
- C. Comply with SPCC plan requirements at qualifying MDOT owned facilities to include consideration of the following:
 - a. Employee training,
 - b. Maintenance of spill prevention equipment,
 - c. Maintenance of SPCC records, and
 - d. Monitor, update and recertify the SPCC plan according to SPCC regulations.
- D. Ensure that all qualifying MDOT owned facilities are equipped with appropriate spill cleanup kits.
- E. Report the number of facilities with SPCC plans and the current status of each SPCC plan.

7.3.7.1 RATIONALE STATEMENT

Have a spill prevention, control, and countermeasure plan in place for all applicable MDOT facilities will ensure that when accidents and spills happen, they are addressed in a timely and efficient manner.

7.3.7.2 MEASURABLE GOAL

MDOT's goal is to ensure that all applicable facilities be covered through an SPCC by the end of the permitting cycle.

7.3.8 EMPLOYEE TRAINING

MDOT recognizes the importance of conducting an employee training that focuses on right-of-way maintenance, fleet and building maintenance, and SPCC compliance as they relate to maintenance and protection of water quality. To ensure continued success of training programs, MDOT will:

- A. Review existing training materials and modify as necessary. Training materials will focus on the following:
 - a. Right-of-way maintenance to include herbicide application,
 - b. Fleet and building maintenance,
 - c. Handling, storage, and disposal of hazardous materials, and
 - d. Procedures to ensure SPCC compliance.
- B. Identify personnel required to attend training.
- C. Develop a schedule for conducting employee training programs. First-year training will include all District Offices. Subsequent years will provide refresher training and training for new employees and personnel.
- D. Conduct employee training according to the identified schedule.
- E. Maintain records of training programs conducted and employee's attendance.
- F. Report the number of training programs conducted and employee attendance in its annual report to MDEQ.

7.3.8.1 RATIONALE STATEMENT

Required under Act 6 of the General Permit

7.3.8.2 MEASURABLE GOAL

MDOT's goal is to have one training event at each district office per year.

Table 7.0 Pollution Prevention / Good Housekeeping – Implementation Schedule and Responsibility

Control Measures and Measurable Goals	Implementation Schedule					Responsibility					
	Year 1	Year 2	Year 3	Year 4	Year 5	Construction	Environmental	Maintenance	Public Affairs	Roadway Design	Other
7.3.1 Maintenance of Roadways											
A. Maintain records of road maintenance activities and issues that may impact water quality.								●			
B. Report roadway maintenance activities and alternate practices used in the Annual Report								●		●	
7.3.2 Street Sweeping											
A. Identify segments with curb and gutter construction to be swept to remove sediments and other pollutants								●			
B. Establish schedules and implement regular sweeping of identified roadways								●			
C. Determine average man-hours used in sweeping operations to determine if schedule adjustments would provide optimized pollutant removal								●			
D. Maintain records of roadway sections swept and associated man-hours used in sweeping those roadways								●			
E. Adjust sweeping schedules according to program assessment on an annual basis								●			
F. Report the roadway sections swept and man-hours utilized in the Annual Report								●		●	
7.3.3 Litter and Debris Removal											
A. Routine removal of debris by maintenance staff.								●			
B. Maintain and promote the Adopt-A-Highway and Adopt-An-Interchange program utilizing volunteers								●			
C. Maintain and promote the Inmate Litter Program.								●			
D. Continue moving and litter removal contracts for defined segments of highways.								●			
7.3.4 Herbicide Application											
A. Review and update as necessary the existing inventory of areas designated for herbicide application								●			
B. Ensure compliance with local, state, and federal regulations associated with herbicide application (e.g. licensing)								●			
C. Review and update as necessary the existing herbicide application schedule								●			
D. Assess each location for opportunities to implement alternative practices for non-herbicide methods of maintenance								●			
E. Develop a prioritized list of areas where alternative weed control practices would reduce volumes of herbicides used								●			
F. Report the total volume of herbicide applied in the Annual Report								●		●	
G. Require annual training for all personnel involved with herbicides								●			
H. Ensure employees understand herbicide container labels and handling terms.								●			

Control Measures and Measurable Goals	Implementation Schedule					Responsibility					
	Year 1	Year 2	Year 3	Year 4	Year 5	Construction	Environmental	Maintenance	Public Affairs	Roadway Design	Other
I. Ensure MSDS sheets for herbicides are kept in trucks when spraying.								●			
J. Review containment and incident response at all training sessions and store herbicides only at appropriate facilities								●			
K. Conduct regular calibration of spray equipment to ensure flow and coverage criteria are correct								●			
L. Turn off spray equipment when crossing bridges, culverts, or other areas with open water								●			
M. Utilize drift control additives and drift reducing nozzles								●			
N. Monitor weather conditions to minimize drift due to wind								●			
7.3.5 Vehicle Maintenance								●			
A. Review and update the existing inventory of MDOT owned vehicles and equipment	■							●			
B. Require vehicle operators to conduct daily inspections of vehicles to check for leaks and other maintenance issues	■	■	■	■	■			●			
C. Conduct routine maintenance on all vehicles and equipment per standard operating procedures	■	■	■	■	■			●			
D. During routine maintenance, inspect vehicles and equipment for fluid leaks	■	■	■	■	■			●			
E. Schedule repairs for vehicles determined to have fluid leaks	■	■	■	■	■			●			
F. Maintain vehicle maintenance records and document fluid leak repair activities	■	■	■	■	■			●			
G. Review vehicle and equipment maintenance records to ensure compliance with manufacturer service specifications	■	■	■	■	■			●			
H. Report the results of the equipment superintendent's checklist for vehicles repaired in the Annual Report	■	■	■	■	■			○		●	
7.3.6 Continuation of the Environmental Compliance Program											
A. Perform environmental compliance inspections at each MDOT facility at least once annually.	■		■		■			○			
B. Nominate facilities demonstrating exceptional adherence for a "Top Shop" award.	■	■	■	■	■			○			
C. Develop facility-specific SWPPPs based on the completed environmental audits	■		■		■			○			
D. Perform environmental awareness training for MDOT shop personnel.	■							○			
E. Provide on-call services to assist with immediate concerns.	■	■	■	■	■			○			
F. Report the findings of the inspections and remedial actions undertaken in the Annual Report	■	■	■	■	■			○		●	
7.3.7 Spill Prevention Plans											
A. Evaluate each MDOT owned facility to determine if Spill Prevention Control and Countermeasure Plans are required	■		■		■			●			
B. Develop, review and maintain SPCC plans for MDOT owned facilities that require plans	■	■	■	■	■			●			

Control Measures and Measurable Goals	Implementation Schedule					Responsibility					
	Year 1	Year 2	Year 3	Year 4	Year 5	Construction	Environmental	Maintenance	Public Affairs	Roadway Design	Other
C. Comply with SPCC plan requirements at qualifying MDOT owned facilities								●			
D. Ensure that all qualifying MDOT owned facilities are equipped with appropriate spill cleanup equipment								●			
E. Report the number of facilities with SPCC plans and the current status of each plan in the Annual Report								○		●	
7.3.8 Employee Training											
A. Review existing training materials and modify as necessary	■							●	○		
B. Identify personnel required to attend training	■							●	○		
C. Develop a schedule for training	■							●	○		
D. Conduct employee training according to the identified schedule								●	○		
E. Maintain records of training programs conducted and employee's attendance								○		●	
F. Report the number of training programs conducted and employee attendance in the Annual Report								○		●	

- Continuing activity, reviewed or revised as needed throughout implementation
- One-time activity to develop or implement a measurable goal

- Individual or department to take lead in the development or implementation of an activity.
- Individual or department to provide strong support in the development or implementation of an activity.
- Individual or department to review and provide comments and guidance during the development or implementation of an activity.

“Other” indicates participation from District Anti-Litter Coordinators.

Appendix 1.0 Glossary of Terms

Best Management Practices “BMPs” means schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of State. BMPs also include treatment requirements, operating procedures, and practices to control runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

Illicit Connection means any man-made conveyance connecting an illicit discharge directly to a municipal separate storm sewer.

Illicit Discharge means any discharge to a municipal separate storm sewer that is not composed entirely of stormwater except discharges pursuant to a NPDES permit (other than the NPDES permit for discharges from the municipal separate storm sewer) and those non-stormwater discharges identified in Part I.B.3. of the State General Permit permit.

Major Receiving Water(s) are those waters of the State that are named on a United States Geological Survey 7.5 Min. Quadrangle Map.

Maximum Extent Practicable “MEP” is the statutory standard that establishes the level of pollutant reductions that operators of regulated MS4s must achieve. The Clean Water Act requires that NPDES permits for discharges from MS4s “shall require controls to reduce the discharge of pollutants to the maximum extent practicable, including management practices, control techniques and system, design and engineering methods.” Compliance with the conditions of the general permit and the series of steps associated with identification and implementation of the minimum control measures will satisfy the MEP standard.

Measurable Goals are a municipality’s stormwater program goals, which are intended to gauge permit compliance and program effectiveness.

Municipality refers to a city, town, county, district, association, or other public body created by or under State law and having jurisdiction over disposal of sewage, industrial wastes, or other wastes.

MS4 is an acronym for "Municipal Separate Storm Sewer System" and is used to refer to either a Large, Medium (e.g. "the Jackson MS4"), or Small Municipal Separate Storm Sewer System. The term is used to refer to either the system operated by a single entity or a group of systems within an area that are operated by multiple entities (e.g., the Jackson MS4 includes MS4s operated by the City of Jackson, the Mississippi Department of Transportation (MDOT) - state and interstate highways, their right-of-ways and thoroughfares [including highways, streets, roads, bridges, maintenance facilities, service areas, and rest areas] within the jurisdictional boundary of MDOT, the University Medical Center and others).

Municipal Separate Storm Sewer means a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains): (i) Owned or operated by a State, city, town, borough, county, parish, district, association, or other public body (created by or

pursuant to State law) having jurisdiction over disposal of sewage, industrial wastes, storm water, or other wastes, including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under section 208 of the CWA that discharges to waters of the United States; (ii) Designed or used for collecting or conveying storm water; (iii) Which is not a combined sewer; and (iv) Which is not part of a Publicly Owned Treatment Works (POTW).

National Pollutant Discharge Elimination System “NPDES” refers to Section 402 of the federal Clean Water Act.

NOI is an acronym for (Notice of Intent) to be covered by this permit and is the mechanism used to “register” for coverage under a general permit.

Outfall refers to the location at which a drainage conveyance, which may be a pipe, box or open ditch, discharges, or flows into, a “Major Receiving Water” within the boundary of any MDOT right-of-way.

Phase II is the second stage of the State and Federal stormwater permit regulations.

Regulated Entity is a small MS4 within the State of Mississippi and located fully or partially within an urbanized area as determined by the latest Decennial Census pursuant to 40 CFR '122.32, or designated by MDEQ pursuant to 40 CFR 123.35.

Small Municipal Separate Storm Sewer System refers to all separate storm sewers that are owned or operated by the United States, a State, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to State law) having jurisdiction over disposal of sewage, industrial wastes, storm water, or other wastes, including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under section 208 of the CWA that discharges to waters of the United States, but is not defined as “large” or “medium” municipal separate storm sewer system (those municipalities with a population of 100,000 or more) . This term includes systems similar to separate storm sewer systems in municipalities, such as systems at military bases, large hospital or prison complexes, and highways and other thoroughfares. The term does not include separate storm sewers in very discrete areas, such as individual buildings.

Stormwater means rainfall runoff, snowmelt runoff, and surface runoff.

Stormwater Management Program “SWMP” refers to a comprehensive program to manage the quality of stormwater discharged from the municipal separate storm sewer system.

Total Maximum Daily Load "TMDL" means the calculated maximum permissible pollutant loading to a water body at which water quality standards can be maintained. The sum of waste load allocations (WLAs) and load allocations (LAs) for any given pollutant.

Urbanized Area “UA” is a land area comprising one or more places {core and fringe} with urban limits defined by a population density of 1,000 people per square mile and its contiguous census tracts of 500 people per square mile — that together have a residential population of at least 50,000.

Appendix 2.0 List of Common Acronyms

BMP	Best Management Practice
CFR	Code of Federal Regulations
CGP	Construction General Permit
COD	Chemical Oxygen Demand
CSO	Combined Sewer Overflow
CWA	Clean Water Act (formerly referred to as the Federal Water Pollution Control Act or Federal Water Pollution Control Act Amendments of 1972)
D.O.	Dissolved Oxygen
EPA	Environmental Protection Agency
FR	Federal Register
LCNOI	Large Construction Notice of Intent (Large Construction General Permit)
MEP	Maximum Extent Practicable
MS4	Municipal Separate Storm Sewer System
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NPS	Non-point Source
O&M	Operation and Maintenance
PA	Permitting Authority
POTW	Publicly Owned Treatment Works
SCNOI	Small Construction Notice of Intent (Small Construction General Permit)
SWPPP	Storm Water Pollution Prevention Plan
TMDL	Total Maximum Daily Load
UA	Urbanized Area