

ADOT's Statewide Individual Stormwater Permit

STormwater Outreach for Regional Municipalities (STORM)

Stormwater & Construction Seminar April 24, 2012

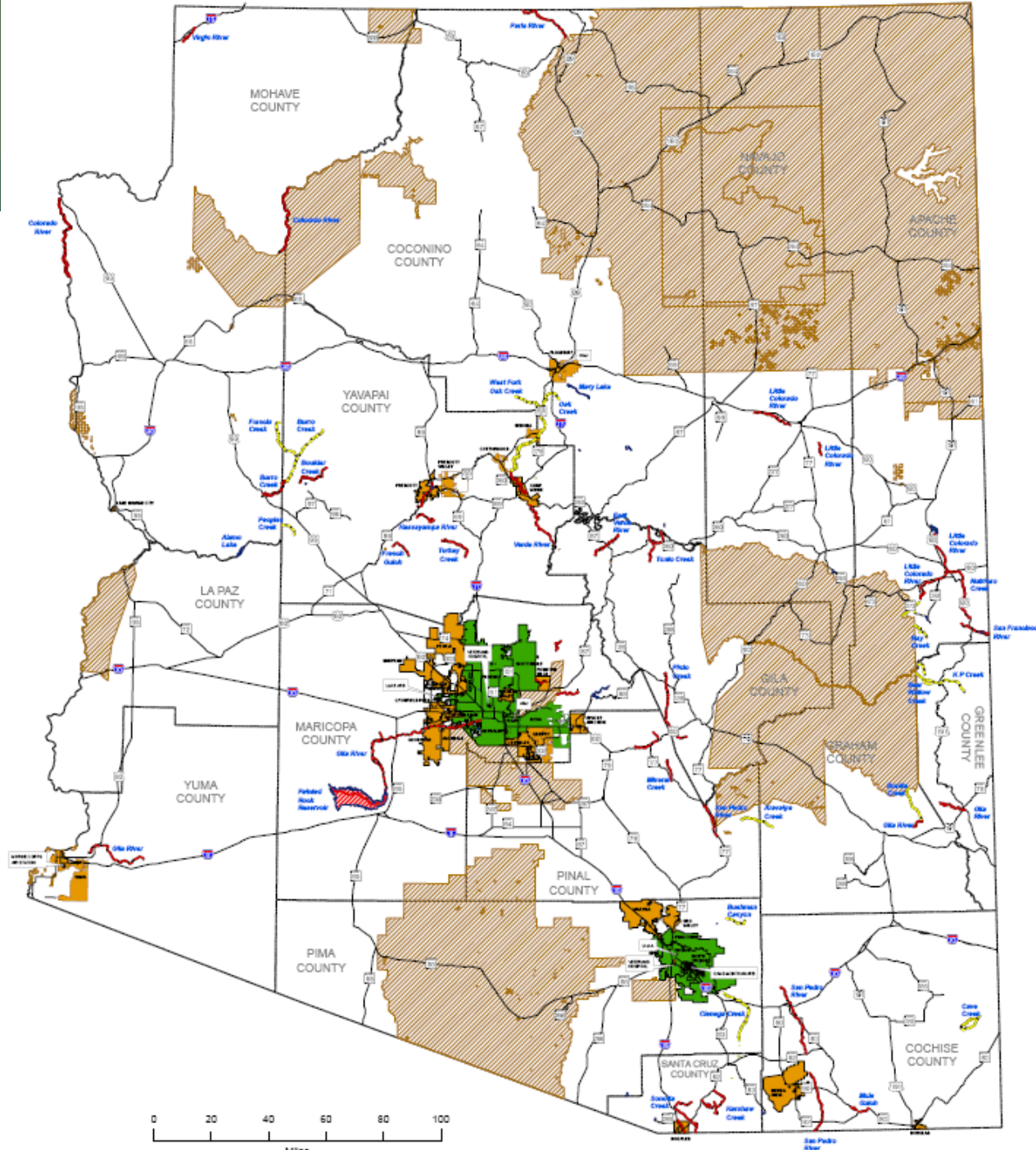
Wendy Terlizzi
Arizona Department of Transportation
Water Quality Manager



ADOT Background

- 10 Districts
- 18,000 travel lane miles (does not include the shoulders or off-ramps)
- 4000 employees
 - 2 fte dedicated to water quality





Permit Background

- In 1999, EPA determined ADOT to be a Phase 1 MS4 and issued a permit for the Phoenix and Tucson metro areas
- Submitted reapplication for Phase I Permit in February 2002
- Expired in September 2002 and was administratively continued by ADEQ
- Submitted revised application to include Phase II requirements in 2003
- In 2004 ADOT received a consent order
 - A condition of the consent order, reapplied for an individual permit

ADOT Individual Permit

- ADOT received 1st draft, March 2007
- Negotiations with ADEQ took place for 15 months
 - Focused on big ticket items
- Final Permit issued August 2008
 - Statewide (not limited to urbanized areas), but does not include Indian Country
 - Includes Phase I and II requirements
 - Includes MS4, construction, industrial
- Expires 2013

Who does the permit affect?

- Most importantly... ADOT
- Contractors/Consultants that operate at our facilities
- Construction contractors: imposed upon them through the ADOT contract specifications
- Municipalities: through connections to ADOT's system and encroachment permits
- Public: illicit discharges and dumping and encroachment permits

Legal Authority

ADOT shall utilize the powers delegated to it to control and enforce the release of pollutants to and discharges from the municipal separate storm sewer that is owned or operated by ADOT through rules and regulations regulating encroachments permits, contracts or similar means.

MS4

- All of ADOT's roadways, rights of way, channels, maintenance yards, etc.
- Requires mapping of the entire ADOT system
- 5 monitoring locations throughout the state
 - 1 sample/site per wet season (2 per year)
- Maintenance yards within urbanized areas need SWPPPs, others need BMPs
 - 3 require monitoring due to their proximity to impaired waters



MS4

- ADOT will install post-construction BMPs near outstanding and impaired waters
- ADOT will evaluate the need for post-construction BMPs in MS4 compliance area (urbanized) and install those controls where appropriate
 - Addresses the limited right of way issue

Construction

- Mirror image of the state construction general permit
- ADOT does not submit NOI/NOT for projects (contractor does under CGP)
- Contractor is responsible for conditions in both permits
- Requires inspections to be performed by an Erosion Control Coordinator (ECC)
- Additional (analytical) monitoring for concrete/ asphalt batch plants within $\frac{1}{4}$ mile of outstanding or impaired waters



Construction

- Tracking of all violations, enforcement actions
- Biannual report to ADEQ listing all of the projects that have achieved final stabilization



Industrial

- ADOT owns/operates 3 types of industrial facilities:
 - Sign shop
 - Grand Canyon National Park Airport
 - Conditions applies to both ADOT and the tenants
 - Various material source sites
 - exclusive use of a material source site, or whenever ADOT is actively operating at a joint use site



Benefits of Individual Permit

- One permit consolidates information and makes finding information easier
- More tailored to DOT practices
- Standardization of regulations for different activities
 - Non-stormwater activities
- Streamlines the reporting process

Challenges of Implementation

- Increased scope of permit
 - Tucson/Phoenix metro area to statewide
- Establishing a stormwater training program
- Culvert inspections, hard to inspect if you do not know where they are
 - Eliminating illicit discharge
 - Lack authority and rely upon encroachment statute

Questions



For More Information...

**Wendy Terlizzi
Water Quality Manager**

**Office of Environmental
Services**

602-712-8353

wterlizzi@azdot.gov