State of Oregon
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Environmental
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Annual Report

ODOT's MS4 Phase I Permit

National Pollutant Discharge Elimination System
MS4 Stormwater Discharge Permit

2024
Monitoring Year

Oregon Department of Transportation
June 1, 2025

DEQ File Number 101822

1.0 Certification and Signature
1. Permit Registrant(s): Oregon Department of Transportation
2. Legally Authorized Representative: Galen McGill
3. Title: Statewide Maintenance and Operations Engineer
4. Email: galen.e.mcgill@odot.oregon.gov
5. Phone: 503-508-1881
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations (40 CFR 122.22(d)). Signature: Galen McGill Galen McGill (May 29, 2025 16:20 PDT) Date: 5/29/25

Created by M. Riedel-Bash
Date: 12/27/2018
Edited for ODOT by Anna D. Roller
Date: 6/30/2021

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Instructions

At least once per year, the permit registrant must evaluate compliance with the requirements of the MS4 Phase I general permit using this Annual Report template. This self-evaluation includes assessment of progress made towards implementing the SWMP control measures in Schedule A, and implementation of actions to comply with any additional requirements identified pursuant to Schedule D.1 (Requirements for Discharges to Impaired Waterbodies).

For each SWMP control measure or activity listed below, please answer all the questions and in the comments field cite any relevant information and/or statistics that helps to illustrate implementation or compliance. If your answer is “No,” in the comments field explain the reasons and outline the anticipated implementation timeline. If the requirement does not apply, explain why it is not applicable in the comments field.

No later than June 1 each year, beginning in 2021, the permit registrant must submit an Annual Report to DEQ. One signed copy and one electronic copy must be submitted to DEQ using the address provided in permit. DEQ can provide an FTP site for submittal of the electronic copy, upon request.

2.0 General Information

2.1 Registrant Information

6. Permit Registrant(s): Oregon Department of Transportation

7. Type(s): ☐ City / ☐ County / ☐ Special District / ☒ Other: Transportation Agency

8. Registrant Type:
Existing Registrant: ☒ New Registrant: ☐

9. MS4 Type:
Large Community: ☐ Small Community: ☐ Statewide: ☒

10. DEQ Permit No: 101822

11. EPA File No: 110870

12. Physical Address: 355 Capitol Street NE, MS11

City: Salem	State: Oregon	Zip: 97301

13. Point of Contact: Ted Hart

Title: Clean Water Coordinator	Email: Ted.Hart@odot.oregon.gov	Phone: 503-991-9367

14. Mailing Address (*if different*): 455 Airport Road SE

City: Salem	State: OR	Zip: 97301

2.2 Municipal Separate Storm Sewer System (MS4) Information

15. Estimate the area served by the MS4: This statewide permit applies to the geographic area encompassing the municipal separate storm sewer system associated with Oregon Department of Transportation (ODOT) owned and/or operated roads, maintenance yards, rest areas, and other facilities located in ODOT highway right-of-way that discharge stormwater to surface waters of the state.

2.3 MS4 Stormwater Discharge Information

Identify the names of all known waters that receive a discharge from your MS4.

16. This permit applies to discharges to receiving waters statewide.

2.4 Coordination Among Registrants and Joint Agreements

Required for permit registrants relying on another entity to satisfy one or more of the requirements of the permit.

17. Is there a joint agreement in place for the implementation of one or more stormwater management program control measures? *Schedule A.2* Yes ☐ No ☒

18. If yes, has there been any change to the joint agreement(s) submitted previously? Yes ☐ No ☒
If yes, include, as an attachment, a summary of the changes.

2.5 Stormwater Management Program Information

19. Discuss the status and overall progress of establishing legal authority to control pollutant discharges into and discharges from the MS4 and to implement and enforce the conditions of this permit. *Schedule A.2.b*

ODOT utilizes relevant regulatory mechanisms as allowed pursuant to applicable state law. These mechanisms are discussed in detail in Section 1.2 of ODOT's Stormwater Management Program Document (SMPD).

2.6 Stormwater Management Program Information

20. Is an updated SMP Document (SMPD) attached? *Schedule A.2.d*

Yes ☒ No ☐

If necessary, provide an explanation:

A summary of SMPD changes is included on the final page of the updated SMPD, Attachment 1.

21. Identify the publicly accessible website where the SWMP Document is posted. *Schedule 2.c & A.3.b.ii*

ODOT completed additional updates to its website in 2024. The MS4 materials are located on ODOT's Storwmater Permits page.

If necessary, provide an explanation: N/A

22. Does the SMPD include an implementation schedule for control measures that have yet to be or are partially implemented? *Schedule A.2.c*

Yes ☐ No ☒

If necessary, provide an explanation: All applicable minimum control measures have been implemented.

23. Describe the method used to gather, track, and use SMPD information to set priorities or assess compliance: *Schedule A.2.d*

ODOT's stormwater program requires participation and involvement from multiple sections and business lines within the agency. The Maintenance and Operations Branch (MOB), the Hydraulics Engineering Section (HES), the Environmental Section and the Regions work together to ensure technical programs are aligned. MOB is responsible for administration of the permit, which includes tracking progress toward implementation of the minimum control measures and reporting compliance activities. The Clean Water Coordinator in MOB gathers the report information and works with other program leads within ODOT to assess compliance, set goals and update the SMPD.

24. Have adequate finances, staff, equipment and other support capabilities been provided to implement the permit? *Schedule A.2.e*

Yes ☒ No ☐

If necessary, provide an explanation: N/A

25. During this monitoring year was compliance with the requirements of this permit evaluated? *Schedule B.1*

Yes ☒ No ☐

If necessary, provide an explanation: ODOT staff reviewed its MS4 permit requirements to confirm implementation deadlines for each of the minimum control measures, which have been met within the applicable deadlines in preparation for submission of this report.

26. During this monitoring year was it determined or reported that discharge from the MS4 caused or contributed to an exceedance of an applicable water quality standard? *Schedule A.1.b*

Yes ☐ No ☒

If necessary, provide an explanation: N/A

3.0 Stormwater Management Program Control Measures

3.1 Public Education and Outreach

27. Provide a brief summary of the ongoing public education and outreach program. *Schedule A.3.a*

This minimum control measure has been fully implemented. ODOT provides educational messages through formal training and informal field training opportunities as well as at public meetings. ODOT's education and outreach program targets the general public, contractors and ODOT employees responsible for inspecting construction project activities and other ODOT employees, such as maintenance staff, about the potential impacts of stormwater on water quality around the state.

The education and outreach activities for 2024 are detailed in number 29 below.

In the Willamette Basin, ODOT presented the OR 99W South Corvallis Facility Plan at the Corvallis City Council Regular Meeting on September 3, 2024 to initiate the formal process for adoption of the plan as an amendment to the City's Transportation System Plan.

ODOT's Region 1 published a webpage detailing the Willamette River Stormwater Improvement Project in which ODOT is building 20 stormwater treatment facilities to clean stormwater runoff from the Fremont Bridge (I-405), the St Johns Bridge (U.S. 30 BY) and U.S. 30 in NW Portland.

28. Were the required components in place by the implementation date? *Schedule A.3.a.i*

Yes ☒ No ☐ *(Implementation date: June 1, 2022)*

29. Provide the number of education and outreach activities conducted: *Schedule A.3.a.iii*

_5_ Pesticide trainings (ODOT employees);

_4_ Presentations for the Oregon State University Pesticide Safety Education Program (PSEP), with two focused on Roadside Vegetation Management and two focused on Pesticide Best Management Practices (BMPs);

_3_ Winter maintenance training sessions (ODOT employees);

_52_ Environmental Construction Inspector (ODOT employees);

_27_ Erosion & Sediment Control Manager (contractors);

_0_ Routine Road Maintenance, Water Quality & Habitat Guide Best Management Practices (here after called "Blue Book") training classes (ODOT employees);

_1_ Structural stormwater control (SSC) maintenance training (55 ODOT employees);

_10_ Online open houses providing an opportunity for public input on ODOT projects (general public);

_1_ Management level Blue Book refresher training for District 1 with approximately 50 participants. Included law enforcement (public) and ODOT safety and maintenance staff.

30. Indicate target audiences addressed during this reporting year: *Schedule A.3.a.iv(A)*

☒ General public, including freeway commuters
☒ Contractors and/or ODOT employees responsible for inspecting construction project activities
☒ Other ODOT employees, as appropriate

31. Have each target audience been addressed during the permit term? *Schedule A.3.a.iv*

Yes ☒ No ☐

32. Indicate target topics addressed during this reporting year: *Schedule A.3.a.iv(B)*

☒ Illicit Discharge identification and reporting procedures
☐ Impacts of illicit discharges on Oregon's waterways
☒ Impacts from roads and appropriate techniques to avoid adverse impacts
☒ Research opportunities related to stormwater
☒ Best management practices for litter and trash control
☐ Best management practices for recycling programs
☒ Low-impact development/green infrastructure
☐ Watershed awareness and how storm drains lead to local creeks and rivers, and potential impacts to fish and other wildlife

☒ Other:

33. Describe the types of educational messages or activities distributed and/or offered during this reporting year. *Schedule A.3.a.iii*

☒ Printed materials
☒ Electronic materials
☒ Social media
☒ Targeted workshops
☐ Other:

34. Was outreach offered in the Willamette Basin during this reporting year? *Schedule A.3.a.iii*

Yes ☒ No ☐

35. Total number during the permit term: ODOT provides multiple training opportunities, project open houses, and public meetings regarding the target topics for each of ODOT's target audiences annually. ODOT has met the implementation requirement to distribute at least 2 messages annually, reaching all target audiences, including at least 1 message in the Willamette Basin each year.

36. Identify and describe the assessment/evaluation of, at least, one education and outreach activity that occurred during this reporting year. Include the assessment process or metric for evaluation, and why this activity was considered successful. *Schedule A.3.a.v*

Prior to 2024 ODOT erosion and sediment control (ESC) training, the requirements and conditions of the recently revised NPDES 1200-CA permit was not generally understood. To assess this lack of understanding, the ESC Program Leader monitored the number of questions relating to this issue, receiving multiple questions per week. After conducting ESC trainings and posting guidance materials, the frequency of inquiries regarding ESC and compliance with the NPDES permit compliance fell to about one inquiry per month. It was concluded that the ESC trainings led to the decrease in ESC questions, reflecting a greater understanding of the requirements and a successful outcome of the trainings.

During EMS hands-on training, trainees audit/evaluate the pollution prevention BMPs within the ODOT maintenance yard. After the audit, trainees have a group discussion, assess which BMPs to change, and effectively remedy any issues.

37. Will the assessment be used to inform future stormwater education and outreach efforts? *Schedule A.3.a.v*

Yes ☒ No ☐

Provide an explanation: As ESC regulations change, training will be evaluated to ensure trainees are provided with the necessary information, BMPs, and resources to comply with these new regulations. Pollution prevention BMPs at maintenance yards are annually evaluated as maintenance methods change (e.g. deicing agents, new types of equipment, etc.).

3.2 Public Involvement and Participation

38. Provide a brief summary of the overall progress towards implementation of this control measure. *Schedule A.3.b*

ODOT exceeded its requirement to create or partner in the development of two public involvement opportunities during the permit term.

In 2024, ODOT led the Federal Highway Administration (FHWA) pooled fund to study 6PPDQ and identified the following goals:

1. Characterize the occurrence, and transport of 6PPDQ in highway stormwater runoff within highway catchments under varying hydrologic conditions.
2. Assess the fate of 6PPDQ in stormwater runoff by assessing effectiveness of existing and modified stormwater BMPs in reducing 6PPDQ concentrations.
3. Develop and evaluate alternative detection strategies, including potential field-deployable methods and proxies.
4. Identify key roadway characteristics (e.g., pavement type, traffic density) that influence 6PPDQ mobilization.
5. Provide DOTs with scientifically defensible data to inform stormwater management practices and regulatory compliance.

39. Were the required components in place by the implementation date? *Schedule A.3.b.i*

Yes ☒ No ☐ *(Implementation date: June 1, 2022)*

40. Is the SMP Document (SMPD) posted on a publicly accessible website? *Schedule A.3.b.ii*

Yes ☒ No ☐

41. Was the publicly accessible website updated during this reporting year? *Schedule A.3.b.ii*

Yes ☒ No ☐

If necessary, provide an explanation: Several updates were made, including on the Hydraulics and Engineering Stormwater Management website. These included a description of the 6PPDQ pooled fund to the Research and Special Projects section in July 2024, and a link was added to Table 8 (UICs) under the Stormwater Facility Maintenance section.

42. Does the publicly accessible website include illicit discharge complaint/reporting information or procedures? *Schedule A.3.b.ii.A*

Yes ☒ No ☐

If necessary, provide an explanation: N/A

43. Does the publicly accessible website include links to official SMPD documents and relevant technical information? *Schedule A.3.b.ii.B*

Yes ☒ No ☐

If necessary, provide an explanation: N/A

44. Does the publicly accessible website include links to all policies and/or guidance documents related to the construction and post-construction stormwater management control programs? *Schedule A.3.b.ii.C*

Yes ☒ No ☐

If necessary, provide an explanation: N/A

45. Does the publicly accessible website include contact information for relevant staff, including phone numbers, mailing addresses and email addresses? *Schedule A.3.b.ii.D*

Yes ☒ No ☐

If necessary, provide an explanation: N/A

46. Describe the public involvement opportunities offered during this reporting year. *Schedule A.3.b.iii*

☒ Public input through project planning and implementation process
☐ Provide technical assistance to local watershed groups
☒ Adopt-A-Highway

☒ Other: Multiple opportunities to provide input on the Oregon Transportation Plan Update. ODOT participated in the Department of Land Conservation and Development (DLCD) green infrastructure grant process.

3.3 Illicit Discharge Detection and Elimination

47. Provide a brief summary of the overall progress towards implementation of this control measure. *Schedule A.3.c*

This control measure has been fully implemented. Specific IDDE activities are described in Section 2.3 of the SMPD.

48. Were the required components in place by the implementation date? *Schedule A.3.c.i*

Yes ☒ No ☐ (Implementation date: June 1, 2022)

If necessary, provide an explanation: N/A

49. Have non-stormwater discharges into the MS4 been prohibited to the extent allowable under state law? *Schedule A.3.c.ii*

Yes ☒ No ☐

If necessary, provide an explanation: Section 1.2 of the SMPD provides information on ODOT's legal authority to oversee its storm system.

50. Describe the written response procedures and process for referring illicit discharges to DEQ. The procedures must include timelines for initial compliance actions and subsequent referrals to DEQ. *Schedule A.3.c.iii*

Illicit discharges to the ODOT drainage system are identified through Road Patrols, Roadside Feature Inspections and reports from citizens or other public agencies.

51. Is there a phone number, webpage, and/or other communication channel publicized for the public use to report illicit discharges? *Schedule A.3.c.iv.A*

☒ Phone number(s)
☒ Webpage(s)
☒ Other communication channels

If necessary, provide an explanation:

ODOT's Report a Hazard page includes phone numbers for non-emergency assistance (e.g. debris in the travel lane) and immediate road hazard (e.g. automobile accident). ODOT's Stormwater Management (Oregon Department of Transportation : Stormwater Management : Hydraulics : State of Oregon) has a link to report illicit discharges (Oregon Department of Transportation : Illicit Discharges : Hydraulics : State of Oregon) including contact information for the Clean Water Program coordinator (503-991-9367, email).

An illicit discharge occurs when anything other than storm water enters our storm water facilities. Dumping chemicals into storm drains, roadways, curb and butter sidewalks, driveways and yards are all sources of illicit discharges. In 2024 ODOT determined that all facilities met the definition of Very Small Quantity Generator (VSQG)—and no longer tracks hazardous waste generation and disposal at ODOT facilities.

52. Provide the number of illicit discharge reports received during this reporting year. Schedule A.3.c.iv.E

Number: _14_ reports related to IDDE, attachment 2 shows illicit discharge summary .

53. On average, how long did it take to respond to reports? *Schedule A.3.c.iv.B*

In working days: _12 hours average response time the same day the discharge was reported__

54. Provide the number of complaints that included notification of the Oregon Emergency Response System during this reporting year. *Schedule A.3.c.iv.B*

Number of notifications: 0

55. Provide the number of reports where staff performed an investigation during this reporting year. *Schedule A.3.c.iv*

Number: _12_ reports

56. On average, how long did it take to conduct an initial investigation? *Schedule A.3.c.iv.B*

In working days: Less than 24 hours after ODOT received the first report of the discharge

57. Provide the number of illicit discharges that were referred to another entity during this reporting year. *Schedule A.3.c.iv.C*

Number: _7_

58. On average, how long did it take to notify the entity(s)?

In working days: _0(same day as report)-12_

If necessary, provide an explanation: For the majority of incidents, ODOT contacts another entity the same day or the day after the illicit discharge report is submitted to ODOT.

59. Provide the number of spills reported to the ODOT Transportation Operations Center System.

Number: _16___

The Transportation Operations Center System (TOCS) Spill Report is included as Attachment 3.

60. Indicate which of the following are included in the complaints or reports tracking documentation: *Schedule A.3.c.iv.E*

- ☒ Date the complaint was received and, if available, the complainant's name and contact information
- ☒ Name of staff responding to the complaint
- ☒ Date the investigation was initiated
- ☒ The outcome of the staff investigation
- ☒ Corrective action(s) taken to eliminate the illicit discharge
- ☒ The responsible party for the corrective action(s)
- ☐ The status of enforcement procedure(s), when necessary
- ☒ The date the corrective action(s) was completed and staff who evaluated final compliance

If necessary, provide an explanation:

After referring an illicit discharge to a jurisdictional authority, ODOT is not typically notified of the status of the enforcement, as ODOT is not the enforcing authority.

61. Briefly describe Routine Maintenance Inspection activities. *Schedule A.3.c.v.(A)*

ODOT inspects its facilities for non-stormwater or illicit discharges during routine maintenance, including but not limited to routine road patrol, catch basin cleaning and annual water quality facility inspections. Inspections are further described in the Post-Construction Stormwater Management section of this report. ODOT's Blue Book provides guidance for maintenance to include stormwater management in every activity performed by maintenance crews to prevent non-stormwater discharges during routine maintenance and to contact MOB if illicit discharges are identified. See Section 2.4.3 of ODOT's SMPD.

62. Briefly describe Routine Road Patrol activities*. Schedule A.3.c.v.(B)*

Road patrols are conducted by ODOT maintenance workers as drive by inspections of highway features to ensure there are no immediate problems or concerns impacting highway operations. See Section 2.3.4 of ODOT's SMPD.

63. Were any illicit discharges identified during routine maintenance inspections?

Yes ☐ No ☒

64. Indicate which of the following dry-weather field screening activities have been performed in the last year: *Schedule A.3.c.v*

- ☒ General observation
- ☒ Inspection during routine maintenance activities
- ☒ Routine Road Patrol
- ☒ Water Quality Facilities Inspections

If necessary, provide an explanation:

ODOT conducts road patrols to observe stormwater-related facilities. Road patrols are conducted more frequently in areas of high traffic or of resource concern. Issues are addressed immediately or scheduled appropriately. Screenings occur through routine maintenance inspections, and general observations and road patrols allowing ODOT to be more efficient with time. These screenings allow staff to quickly determine whether an illicit discharge is present at a given site.

65. If flow is observed and the source is unknown, provide a brief description of the field investigation and analysis process. *Schedule A.3.c.v.C,D*

ODOT's Blue Book instructs maintenance crews to contact the Maintenance and Operations Branch if impacts from adjacent landowners are observed. In most cases, ODOT will not be the jurisdictional

authority for illicit discharges entering its system. The investigation process includes research into potential sources of flow, determination of the jurisdictional authority, notification and cooperation with that agency, city or county.
66. Are all persons responsible for investigating and eliminating illicit discharges and illicit connections into the MS4 appropriately trained to conduct such activities? *Schedule A.3.c.vi* Yes ☒ No ☐ **If necessary, provide an explanation:** Illicit discharge training is included with the annual Blue Book training offered to ODOT employees.

3.4 Construction Site Runoff Control

67. Provide a brief summary of the overall progress towards implementation of this control measure. *Schedule A.3.d*

This control measure has been fully implemented. ODOT reduces the discharge of pollutants from construction sites having one or more acres of ground disturbance through its Regional 1200-CA permits. ODOT Technical Advisory GE 12-01(A) outlines the process to provide appropriate erosion control for all construction projects having the potential to cause erosion, including those construction projects not subject to the 1200-CA. The Blue Book, developed and maintained by ODOT in consultation with NMFS, ODFW, and DEQ, specifies BMPs to be used when carrying out maintenance activities that could otherwise have an adverse effect on water quality and other environmental resources. The maintenance activities described in the Blue Book include both maintenance of installed post-construction stormwater BMPs, as well as stormwater management principles generally. Construction site runoff is also regulated and managed by adhering to requirements set by other permits, including the Clean Water Act (CWA) Section 404 permits; CWA Section 401 water quality certifications (WQCs); and Oregon Department of State Land's (DSL's) Oregon Removal/Fill Permit. See Section 2.4 of ODOT's SMPD.

68. Were the required components in place by the implementation date? *Schedule A.3.d.i*

Yes ☒ No ☐ *(Implementation date: June 1, 2022)*

69. Did ODOT require erosion controls, sediment controls, and waste materials management controls to be used and maintained at all ground-disturbing projects from initial clearing through final stabilization to reduce pollutants in stormwater discharges to the MS4 from construction sites? *Schedule A.3.d.ii*

Yes ☒ No ☐ NA ☐

If necessary, provide an explanation: ODOT's Standard Specifications, Section 00280, details the Erosion and Sediment Control Plan (ESCP) minimum requirements for all Project Sites and conditions, Section 00290 regarding environmental protection, explicitly describes control of waste materials. The Blue Book includes stormwater BMPs that apply to maintenance activities.

70. Did ODOT require contractors to complete and implement an ESCP for all constructions sites? *Schedule A.3.d.ii*

Yes ☒ No ☐ NA ☐

If necessary, provide an explanation: ODOT Technical Advisory GE 12-01(A) outlines a process to provide appropriate erosion control for all construction projects having the potential to cause erosion, including those construction projects not subject to the 1200-CA. Construction projects that do not disturb soil, such as signal work, or signage do not require an ESCP. Small projects that are smaller than the one-acre threshold which trigger 1200-CA compliance are still required to provide erosion control plans as a contract condition.

Plans for construction projects subject to the 1200-CA are required to include an ESCP. The updated 1200-CA permit contains new ESCP requirements for the DEQ submittal including a Cover Sheet that provides an overview of the project, its schedule and contractor. The DEQ-provided cover sheet template was incompatible with ODOT drafting standards and Plans format, so it was reconfigured into 3 sheets, two of which were filled out by the Professional of Record (POR) and the third filled out by the contractor after the project was awarded. The ESCP must now also include sheets for each phase of the project. Phases of work for ODOT project follow areas of disturbance, rather than the land development model anticipated by DEQ. ODOT continues to work toward a solution to meet the intent of DEQ's expectations regarding phase of work submittals. Other updates to ODOT's Erosion and Sediment Control (ESC) Program include:

- Edits to the ESC Manual to provide guidance on the revised Permit requirements.
- Edits to the Scoping Templates to capture the new Permit requirements for consultant designers.
- Development of a Contract Change Order (CCO) template to streamline contract changes for projects that were already under construction prior to the effective date of the permit update.

71. Describe ODOT's response procedure and actions to ensure compliance with its ground-disturbing construction site runoff program:

ODOT includes ESC requirements as contract requirements. If conditions are not satisfied, ODOT will require the work be performed or payment will not be provided. ODOT's Standard Specifications, Section 00140, Scope of Work, detail the remedies available to ODOT if the contract requirements are not met. Egregious violations will result in stop-work orders that can last until the failures that cause the violations are repaired and cleanup is completed and may result in enforcement action by DEQ. Construction personnel who disregard construction directives may be removed from projects at ODOT's discretion. Section 00280 was updated in 2023 to include corrective action timelines. See Section 2.4 of the SMPD.

72. Does ODOT have NPDES Construction Stormwater Permit coverage under the NPDES Construction Stormwater General Permit (1200-CA or equivalent). *Schedule A.3.d.ii*

Yes ☒ No ☐ NA ☐

If necessary, provide an explanation: ODOT's Regional 1200-CA permits were updated in 2023. The Permit update required revisions to the Oregon Standard Specifications for Construction, Section 00280, erosion and sediment control. Subsections of the 00280s that are revised are as follows:

- 00280.00 – Scope
- 00280.04 – ESCP on Agency Controlled Lands
- 00280.05 – ESCP on Non-Agency Controlled Lands
- 00280.16(h) – Temporary Sediment Trap
- 00280.16(k) – Active Treatment System
- 00280.30 – ESC Manager
- 00280.41 – Work Restrictions
    - (a) Disturbance Limits
    - (e) Buffers
    - (f) Hauling Material
    - (g) Underground Injection Controls (UIC)
- 00280.42 – Stabilization
    - (a) Soil Exposure Limitations
    - (b) Temporary Stabilization
    - (c) Permanent Stabilization
- 00280.46(h) – Temporary Sediment Trap
- 00280.46(j) – Access Routes
- 00280.62 – Inspection & Monitoring
    - (a) Inspection
    - (b) Rainfall
    - (c) Monitoring Receiving Stream
- 00280.64 – Corrective Actions
    - (a) Corrective Action Timelines
    - (b) Corrective Action Documentation
- 00280.90 - Payment

73. Provide the written specifications that address the proper installation and maintenance of such controls during all phases of construction activity occurring in its coverage area. *Schedule A.3.d.iii*

The Oregon Standard Specifications for Construction, Section 00280 addresses installation and maintenance of ESCs during all phases of construction.

If necessary, provide an explanation: Section 00280 of ODOT's Standard Specification for Construction have been revised. The redline comparison between 2021 and 2024 can be found here: Standard Specifications

74. Explain ODOT's process for reviewing ESCP from every construction project to ensure the plan is appropriate for the site, and determining if implemented as designed will effectively control construction site.

Plans for construction are reviewed for content and appropriateness by subject matter experts at each submittal milestone. ODOT's Erosion Control Manual details Contractor Responsibilities and provides guidance regarding revisions to the ESCP in the plan and on the ground, to meet conditions of construction.

75. Describe the conditions under which an inspection is conducted, the frequency of such inspections, how inspections are documented, and how follow-up actions are determined and implemented. *Schedule A.3.d.v*

Inspections are conducted according to the frequency required by the 1200-CA permit and/or ODOT guidance. Revisions to the 00280 Specifications reflect and mirror the inspection requirements identified in the 1200-CA Permit.

76. Provide the written escalating enforcement and response procedure to address violations, through progressively stricter responses supported by contracts held with contractors, to achieve compliance. The procedure must include ODOT's criteria for self-reporting illicit discharges, and timelines for compliance. *Schedule A.3.d.vi*

ODOT's Standard Specifications, Section 00140, Scope of Work, details the remedies available to ODOT if the contract requirements are not met.

77. Were all persons responsible for ESCP reviews, site inspections, and enforcement appropriately trained to conduct such activities? *Schedule A.3.d.vii*

Yes ☒ No ☐

If necessary, provide an explanation:

ODOT's Environmental Construction Inspector Certification is valid for five years. ODOT's ESC Manager Certification is required to perform ESCP reviews and inspections. The ESCM is valid for five years, ensuring training will occur at least once during the permit term. Both ESCM and Environmental Construction Inspector training content was revised to reflect the changes to the 1200-CA Permit requirements which became effective on April 1, 2023.

Introductory presentations were provided to technical staff in each of the ODOT's Regions to provide guidance on both the development of ESCPs that are Permit compliant, and to introduce Construction staff to the expectations they are now presented with in the more stringent Permit. A presentation was provided at the annual conference of the Association of General Contractors.

ODOT provided certification training for 55 Contractor's ESC Managers as follows:

- 2/14/23; 11 participants
- 3/7/23; 33 participants
- 2024: 27 participants

ODOT provided certification training for 106 Certified Environmental Construction Inspectors as follows:

- 2/15 & 2/16/23; 37 participants
- 3/8 & 3/9/23; 37 participants
- 2024; 52 participants

3.5 Post-Construction Site Runoff

78. Provide a brief summary of the overall progress towards implementation of this control measure. *Schedule A.3.e*

This control measure has been fully implemented. The ODOT Hydraulics Manual (HM) provides guidance for designing hydraulic features related to ODOT's transportation system including stormwater management guidance. Specifically, chapters 12 and 14 presents guidance on a) water quantity standard, b) water quality standard, c) SSC design and specifications, and d) the stormwater selection process (i.e., stormwater mitigation options). The hydraulic/stormwater design deviation, Requirement E (allowance for alternative compliance) is covered in chapter 3 of the HM.

ODOT has also developed guidance documents to supplement the HM that provides technical direction and communicate project delivery policies to staff and consultants working on ODOT projects including:

- PD-05 Post-construction Stormwater Management for Environmental Compliance (updated 2023),
- HE24-01(B) Underground Injection Control Systems (UIC),
- GE16-01(B) Stormwater Control Facility Operation and Maintenance (O&M) Plan Development Drafting Guidance, and
- GE16-02(B) Stormwater O&M Manuals – Update.

Stormwater technical standards and specifications include several boilerplate special provisions for structural stormwater BMPs: Water Quality Structures (SP01010), Ponds (SP01011), Biofiltration Swale (SP01012), Bioslope (SP01013) and Filter Strip (01014).

These documents are available on the ODOT Oregon.gov webpage:
https://www.oregon.gov/odot/hydraulics/Pages/Hydraulics-Manual.aspx
https://www.oregon.gov/odot/hydraulics/Pages/Technical-Guidance.aspx
https://www.oregon.gov/odot/hydraulics/Pages/Specs.aspx
https://www.oregon.gov/odot/hydraulics/Pages/Standards.aspx

79. Were the required components in place by the implementation date? *Schedule A.3.e.i*

Yes ☒ No ☐ *(Implementation date: June 1, 2023)*

80. Describe efforts to identify, minimize or eliminate barriers within ODOT's legal authority that inhibit design and implementation techniques intended to minimize impervious surfaces and reduce stormwater runoff (Low Impact Development and Green Infrastructure). *Schedule A.3.e.iii*

ODOT design procedures strongly prefer low impact development (LID) techniques (see HM Chapter 14, Appendix A) because they tend to result in superior environmental outcomes, are preferred by regulatory agencies, are usually easier to maintain in proper working order, and sometimes require no special maintenance. As a result, most ODOT projects required to manage post-construction stormwater runoff successfully employ LID techniques. When ODOT satisfies its stormwater management obligations using non-LID techniques, it's almost always due to physical constraints, singularly or in combination, that are not practicable to overcome. Examples of such constraints include:

- Insufficient distance between the impervious surface and the receiving water;
- Native soils that aren't conducive to infiltration;
- Competing environmental resources such as wetlands, streams, and cultural resources that would have increased impacts as a result of LID implementation that would either be legally not permittable or would render the LID treatment counterproductive;
- Inadequate groundwater separation;
- Vertical head or drop limitations that physically prevent conveying water to LID facilities; and
- Right of way limitations (in cases where the potential benefits of treatment are too small to outweigh the high costs of obtaining right of way, rendering right of way impracticable)

ODOT works within these constraints to achieve the reduction of pollutants to the maximum extent practicable.

An internal evaluation was conducted in 2023 to review ODOT policies and practices to determine if barriers existed to the implementation of LID practices and Green Infrastructure (GI) stormwater management facilities. Interviews were carried out with representatives across different departments/section/areas within the agency to gain insight into the types of barriers that may exist within ODOT.

81. Describe any modifications to standards resulting from those efforts.

ODOT continues to look for opportunities to improve the implementation of LID and GI on ODOT projects. The 2023 internal evaluation also looked at opportunities for improving ODOT's implementation of LID and GI training and additional guidance.

82. Indicate which technical standards are included in the Post-Construction Stormwater Management Program, include links and highlight any changes made in the reporting year: *Schedule A.3.e.iv*

☒ Flow Control Standards (to address hydromodification impacts)

- HDM Chapter 12, Section 12.5 Flow Control design criteria, Section 12.5.1.1 Channel Processes Design Storms page 12-12 (Hydromodification)
- Federal Aid Highway Program (FAHP) in the State of Oregon, Section 29,a,b,c,d.vii-viii

☒ Water Quality Standard

- HDM Chapter 14, Section 14.8
- Federal Aid Highway Program (FAHP) in the State of Oregon, Section 29,a,b,d.vi

☒ Structural Stormwater Control Design and Specification

- Flow Control: HDM Chapter 12 Sections 12.5.2-12.5.4, 12.9
- Water Quality: HDM Chapter 14 Appendix A-F
- SP01010, Stormwater Control WQ Structures
- SP01011, Stormwater Control Ponds
- SP01012, Stormwater Control WQ Biofiltration Swale
- SP01013, Stormwater WQ Bioslope
- SP01014, Stormwater WQ Filter Strip
- ODOT 2024 Standard Specifications
- ODOT Qualified Products List, Category: Stormwater Control Facilities, Spec # 01010.03
- Operations & Maintenance Manual Templates
- Stormwater/hydraulic facility drafting guidance
  - ODOT CAD Manual, Section 513 Major Category "H" – Hydraulic
  - GHE CAD Manual, Part 400
  - GE16-01(B) Stormwater Control Facility O&M Plan Development Drafting Guidance

☒ Allowance for Alternative Compliance (Deviation)

- HDM Chapter 3, Appendix A – Hydraulic Design Deviation Form (Note, open link with Internet Explorer)

☒ Stormwater Mitigation Options

- FAHP Programmatic User's Guide 3.5.5 Off-Site Management and Mitigation
- FAHP Programmatic User's Guide 3.5.6 Opportunistic Stormwater Treatment Credit Approach

If necessary, provide an explanation: N/A

83. Describe how ODOT reviews and approves project-specific documents and plans for sites that require an engineered stormwater control facility. *Schedule A.3.e.v*

Before initiating construction, ODOT reviews and approves project-specific documents and plans for sites that require an engineered stormwater control facility as part of the ODOT Project Development phase. These documents include Hydraulic Reports, Stormwater Reports, Stormwater Management Plans, FAHP Stormwater documentation, and Plans, Specifications and Estimates (PS&E).

The Project Development phase includes the Design Acceptance, Preliminary Plans, Advance Plans, Final Plans, Plans, Specification and Estimates (PSE), Advertisement and Contract Award, including review of documents and deliverables at each milestone. The Plan Development Phase follows after Design Acceptance and provides detailed information about the expectations, requirements and deliverables for Preliminary Plans, Advanced Plans and Final Plans milestones of project development. Final Plans includes hydraulics/stormwater reports that documents the design of engineered stormwater control

facilities. The PS&E phase prepares the project documents for contracting, including stormwater management facility O&M manuals (if applicable).

ODOT has a template for Stormwater Management Plans and a typical Stormwater Design Report and Hydraulic Report layout in Chapter 4 of the HM.

These documents are available on the ODOT Oregon.gov webpage.

- Stormwater Management Plan Template
- SWMP QC Process
- Project Delivery Guide
- Hydraulics Manual Chapter 4 Documentation
- After the project contract award, the project transitions to the Construction Management phase for construction.

84. Briefly describe the Long-Term Operation and Maintenance (O&M) strategy for water quality facilities (WQFs): *Schedule A.3.e.v*i

ODOT's Hydraulics and Engineering Section (HES) maintains an inventory of water quality facilities using assigned drainage facility identification (DFI) numbers (unique identification). The Maintenance and Operations Branch (MOB) has a water quality facility database that is regularly updated to include newly assigned DFI numbers. MOB uses this inventory information from HES to create inspection forms that are provided to maintenance district staff at the beginning of each year. Maintenance district staff are responsible for completing the inspection and maintenance of the facilities. Water quality facilities are typically inspected annually and maintained as needed. Maintenance district staff document inspection and maintenance activities and return the forms to MOB. The inspection and maintenance information are entered into the water quality facility database and the electronic copies of the returned forms are retained.

ODOT has developed Standard Maintenance Tables and O&M Manual templates for its water quality facilities. The Standard Maintenance Tables include information regarding recommended maintenance actions for each type of stormwater facility. O&M Manuals are required by the MS4 Permit and the FAHP. Project Delivery staff prepare O&M Manuals with site-specific information on facility O&M for newly constructed water quality facilities. The manuals are provided to maintenance staff upon completion of construction. ODOT is retroactively creating O&M manuals for existing facilities.

85. Does the strategy provide the following elements?

☒ Inspection procedures and an inspection schedule that comply with O&M requirements for each WQF
☒ A tracking mechanism for documenting inspections and the O&M requirements, including
☒ Maintenance documentation
☒ Requirements to maintain and/or replace vegetation to ensure functionality
☒ Locations of all stormwater controls installed, viewable through ODOT's public GIS interface

If necessary, provide an explanation: N/A

86. Describe how ODOT ensures that the ODOT employees or contractors responsible for performing post-construction runoff site plan reviews, administrating the alternative compliance program, or performing O&M practices, or evaluating compliance with long-term O&M requirements are trained at least once during the permit term to conduct such activities:

- ODOT's Blue Book training is offered annually to maintenance districts and includes a review of the standard maintenance tables and other tools available to maintenance staff to assist in the O&M of water quality facilities.
- Hydraulic engineer/plan reviewer training (April 2023).

87. Were all persons responsible for performing post-construction runoff site plan reviews, administrating the alternative compliance program, or performing O&M practices or evaluating compliance with long-term O&M requirements appropriately trained to conduct such activities? *Schedule A.3.e.vii*

Yes ☒ No ☐

If necessary, provide an explanation: N/A

3.6 Pollution Prevention and Good Housekeeping for Municipal Operations

88. Provide a brief summary of the overall progress towards implementation of this control measure. *Schedule A.3.f*

This control measure has been fully implemented. ODOT continues to adaptively manage its Environmental Management System (EMS) Program, Spill Prevention Control and Countermeasure (SPCC) Program and other relevant programs to minimize potential impacts to stormwater generated on ODOT-owned facilities. ODOT has developed a GIS map that shows completion of yard EMS audits and additional information (e.g. stormwater treatment, BMPs, pretreatment system, etc.).

89. Were the required components in place by the implementation date? *Schedule A.3.f.i*

Yes ☒ No ☐ *(Implementation date: June 1, 2021)*

90. Were O&M strategies for existing controls implemented? *Schedule A.3.f.ii*

Yes ☒ No ☐ N/A ☐

If necessary, provide an explanation: N/A

91. Provide a brief summary of the EMS program activities implemented:

The EMS Manual is ODOT's written stormwater management plan for the maintenance yards. The EMS program provides guidance for pollutant source identification in addition to consistent, practical, BMPs for source control and pollutant removal. Program updates were completed in 2009, 2013 and 2019. The program defines BMPs and benchmarks for managing products and wastes. 21 district EMS trainings and 35 EMS audits were completed in 2024.

92. Is the EMS Annual Report included with this Report?

Yes ☐ No ☒

If necessary, provide an explanation: The EMS goals that were included in ODOT's Sustainability Plan have been met and updated. The Sustainability Plan does not have new EMS-related goals. There are two decades of data showing ODOT met over 90% of the BMPs for materials management for the 7 priority procedures. Yards continue to be audited and the records are maintained. In 2024, ODOT further reduced hazardous waste generation by replacing 23 solvent-based parts washers with washers that are non-toxic, non-hazardous, and non-flammable. In 2024 ODOT determined that all facilities met the definition of Very Small Quantity Generator (VSQG)—and no longer tracks hazardous waste generation and disposal at ODOT facilities.

93. Provide a brief summary of the catch basin cleaning activities implemented:

Catch basin inspection and cleaning is typically performed on an annual basis. Some areas require more frequent cleaning. District crews are responsible for identifying maintenance requirements.

94. Provide a brief summary of the Integrated Vegetation Management Plan activities implemented:

The ODOT Integrated Vegetation Management (IVM) program is required under Oregon statute ORS 634.660. The program develops agency guidance for managing noxious weeds, landscape plantings, roadside timber, and other vegetation issues associated with ODOT rights-of-way. Goals of the ODOT IVM program include encouraging self-sustaining vegetation and reducing the need for herbicides, fertilizers, and irrigation. ODOT continually explores new vegetation management practices, technologies, and partnerships to improve its IVM program. Primary IVM management tasks completed by ODOT in 2024 include:

- Provided guidance to maintenance on vegetation management techniques and meeting applicable laws.
- Ensured compliance with ODOT's NPDES 2300-A Pesticide General Permit and submitted the required annual report to DEQ.
- Updated ODOT's Pesticide Discharge Management Plan.
- Conducted 5 pesticide trainings.
- Updated USFS Pesticide Use Proposals (PUPs) for 2 districts.
- Hosted 8 Regional Spring Vegetation Management Refresher Trainings (Oregon Department of Agriculture approved) for 112 ODOT applicators.

95. Provide a brief summary of Litter Control activities implemented:

ODOT cleans up litter and debris found along state highways using its own employees (permanent or temporary), contractors, and volunteers. The litter control work is managed individually by District. The Youth Litter Patrol program is designed to involve youth in the cleanup of litter along state highways. Crews usually have a crew leader and two or more crew members and are based in various locations in the state. Crews work primarily in the summer months. The Adopt-A-Highway program involves volunteers in the clean up of litter along state highways. In 2024, 62 permits for Adopt-A-Highway activities were issued.

96. Provide a brief summary of the Appropriate Materials Disposal activities implemented:

The EMS program coordinator provided guidance on managing materials used in the day-to-day maintenance of the highway system.

- Researched bioremedial parts washers to determine suitability for ODOT field technicians who service ODOT vehicles and equipment.
- ODOT further reduced hazardous waste generation by replacing 23 solvent-based parts washers with washers that are non-toxic, non-hazardous, and non-flammable.

97. Were all persons responsible for evaluating O&M practices, evaluating compliance with long-term O&M requirements or ensuring pollution prevention at facilities and during operations appropriately trained to conduct such activities? *Schedule A.3.f.v*

Yes ☒ No ☐

If necessary, provide an explanation: N/A

4.0 Winter Maintenance Program

98. Provide a brief summary of the overall progress towards implementation of this control measure. *Schedule A.3.e*

The control measure has been fully implemented. ODOT's Winter Maintenance Program was developed to limit water quality impacts from winter maintenance activities. Winter maintenance materials are stored and applied in conformance with BMPs outlined in the ODOT EMS Manual and Maintenance Guide. Application BMPs are outlined in the Maintenance Guide. During EMS audits, ODOT staff visually inspect storage areas. Additional details are provided in the Winter Maintenance Annual Report.

99. Were the required components in place by the implementation date? *Schedule A.3.g.i*

Yes ☒ No ☐ *(Implementation date: June 1, 2022)*

100. Describe how ODOT utilizes its EMS program to ensure that winter materials (including solid salt, deicers including but not limited to magnesium chloride [MgCl2], and abrasives) are stored properly:

Winter maintenance materials are stored and applied in conformance with BMPs outlined in the ODOT EMS Manual and Maintenance Guide. During EMS audits, ODOT staff visually inspect storage areas.

101. Describe how ODOT utilizes the Blue Book to ensure proper use of these materials:

Winter maintenance BMPs are outlined in the Blue Book, and address plowing practices, application BMPs, recordkeeping, calibration, and material purchasing.

102. Was the Winter Maintenance Strategy updated during the permit term?

Yes ☐ No ☒

103. Is a copy included with this Report?

Yes ☐ No ☒

If necessary, provide an explanation: The Winter Maintenance Strategy was not updated in 2024.

104. Is the Winter Maintenance Annual Report included with this report?

Yes ☒ No ☐

If necessary, provide an explanation: The Winter Maintenance Annual Report is included as Attachment 4.

105. Has ODOT implemented research of best management practices related to the management and application of winter maintenance materials?

Yes ☒ No ☐

If necessary, provide an explanation: Worked with district yard staff to improve containment of salt storage facilities.

5.0 Stormwater Retrofit Strategy

106. Provide a brief summary of the overall progress towards implementation of this control measure. *Schedule A.3.h*

ODOT's Stormwater Retrofit Strategy Document was provided to DEQ in 2024.

107. Were the required components in place by the implementation date? *Schedule A.3.h.i*

Yes ☒ No ☐ *(Implementation date: June 1, 2024)*

If necessary, provide an explanation: N/A

108. Describe the progress toward developing ODOT-defined set of stormwater quality retrofit objectives and range of retrofit control measures:

ODOT developed its retrofit strategy objectives to include identification of retrofit opportunities in designated priority areas using ODOT's established guidance to evaluate stormwater BMPs for target pollutants. A new working group has been established to evaluate and select retrofit projects and we're in the process of developing the evaluation and selection criteria. We have submitted a budget request for the next biennium to fund the stormwater retrofit projects.

109. Describe how these objectives prioritize progress toward improving water quality:

ODOT's retrofit strategy document prioritizes progress toward improving water quality by continuing to implement its existing policy for project-triggered retrofits to address all contributing impervious area in post construction stormwater treatment and by prioritizing future projects in the Lower Willamette River Watershed, including a large retrofit project in progress in Portland Harbor. ODOT will continue to look for opportunities to leverage funding to prioritize progress toward water quality improvements as resources allow.

110. Is the Stormwater Retrofit Strategy Document included with this Report?

Yes ☐ No ☒

If necessary, provide an explanation:

The Stormwater Retrofit Strategy Document was provided to DEQ in 2024.

6.0 Monitoring

111. Was monitoring completed in accordance with the most recent Monitoring Plan? *Schedule B.2*

Yes ☒ No ☐

If necessary, provide an explanation:

112. Is the monitoring data submitted with this report? *Schedule B.2*

Yes ☐ No ☒

If necessary, provide an explanation: In 2024 ODOT submitted monitoring data to DEQ from 6 different sampling events associated with PDX Harbor.

7.0 MS4 Data Compilation

113. Provide a brief summary of the overall progress towards implementation of this control measure. *Schedule D.1*

ODOT's MS4 data compilation and a description of the digital inventory and a gap analysis was provided to DEQ in 2024.

114. Were the required components in place by the implementation date? *Schedule D.2.i*

Yes ☒ No ☐ *(Implementation date: June 1, 2024)*

If necessary, provide an explanation: N/A

115. Does the digital inventory include:

☒ Location and physical characterization of all available outfalls, conveyance systems, and stormwater control locations collected by ODOT or consultants contracted by ODOT since 1999?

☒ Any and all available monitoring data collected by ODOT or consultants contracted by ODOT since 1999?

☒ Tracking information related to water quality control measures in this digital inventory?

☒ Any additional data for characterizing the ODOT MS4?

If necessary, provide an explanation: N/A

116. Are the priority locations identified in ODOT's Retrofit Program Strategy Document included in the digital data?

Yes ☒ No ☐

If necessary, provide an explanation: N/A

117. Describe ODOT's work to identify where geographic or subject-area gaps in data exist:

During the permit term, ODOT staff have compiled and reviewed all location data, monitoring data, tracking information and research data.

118. Is the summary included with this Report?
(Due with the fourth MS4 Annual Report or June 1, 2024)

Yes ☐ No ☒

If necessary, provide an explanation: N/A

119. Has ODOT consulted with DEQ to prioritize how to address the identified geographic-, subject-, or pollutant-specific gaps in information?

Yes ☒ No ☐

Discussions with DEQ regarding the permit renewal are expected to include prioritization of the gaps identified in the Data Compilation and Summary Gap Analysis included with this report.

120. Has the following winter maintenance data, where possible, pertaining to winter maintenance been included in the digital data?

☒ Location of maintenance yards and structures containing winter maintenance materials;

☒ Locations of use of winter maintenance materials;

☒ Quantities used in relation to distance (e.g., pounds per mile);

☒ Other potentially useful information found through research topics that will help improve water quality related to Oregon's transportation system?

121. Describe any research topics ODOT has implemented that will help improve water quality related to Oregon's transportation system:

Project initiated but not implemented yet.

In July 2023 ODOT initiated the solicitation for pooled funding from the FHWA for the project titled "Stormwater Management to Address Highway Runoff Toxicity due to 6PPDQ from Tire Rubber." Once the solicitation received the matching funds request from CA, WA, and PA DOTs the FHWA activated the project as Transportation Pooled Fund TPF-5(524) in October 2023. This pooled fund now has a project budget of $960K and the request for proposals is under development with a goal start date of June 2024. This research aims to equip DOTs with a targeted and cost-effective approach for effectively managing 6PPDQ in highway runoff through the following objectives:

1. Characterize the occurrence, and transport of 6PPDQ in highway stormwater runoff within highway catchments under varying hydrologic conditions.
2. Assess the fate of 6PPDQ in stormwater runoff by assessing effectiveness of selected stormwater BMPs in reducing 6PPDQ concentrations.
3. Identify key roadway characteristics (e.g., pavement type, traffic density) that influence 6PPDQ mobilization.
4. Provide DOTs with scientifically defensible data to inform stormwater management practices and regulatory compliance.

Additionally, ODOT is providing funding for research at Oregon State University on the effectiveness of biochar in soil media for 6PPDQ removal. The overarching goal of this project is to identify and test an effective, low-impact, and cost-efficient biochar amended media mixture capable of remediating stormwater runoff toxicity to salmonid species.

8.0 Index of Attachments

1. **Stormwater Management Program Document (SMPD)**
2. **IDDE Tracking Spreadsheet**
3. **TOC Spills Report**
4. **2024 Winter Maintenance Report**