



RIPDES SMALL MS4 ANNUAL REPORT

GENERAL INFORMATION PAGE

RIPDES PERMIT # RIR040036

REPORTING PERIOD (check one):

☐

YEAR 1

March 04-Dec 04

☐

YEAR 2

Jan 05-Dec 05

☒

YEAR 3

Jan 06-Dec 06

☐

YEAR 4

Jan 07-Dec 07

☐

YEAR 5

Jan 08-Dec 08

OPERATOR OF MS4

Name: Jerome F. Williams, Director, RHODE ISLAND DEPARTMENT OF TRANSPORTATION			
Mailing Address: Two Capitol Hill			
City: Providence	State: RI	Zip: 02903	Phone: 401 222 2023
Contact Person: Edward S. Szymanski	Title: Associate Chief Engineer		
Legal status (circle one):			
PRI - Private	PUB - Public	BPP - Public/Private	STA - State
FED - Federal			
Other (please specify):			

OWNER OF MS4 (if different from OPERATOR)

Name: SAME			
Mailing Address:			
City:	State:	Zip:	Phone: ()
Contact Person:	Title:		

CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under the 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, I certify that 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.	
Print Name	Jerome F. Williams
Print Title	DIRECTOR
Signature	Date

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MINIMUM CONTROL MEASURE #1: PUBLIC EDUCATION AND OUTREACH (Part IV.B.1 General Permit)

MEASURABLE GOALS:

NOTE: Report must be limited to activities implemented during the third year (calendar year 2006) of the program, which the permittee had listed as a measurable goal in the Storm Water Management Program Plan, or incomplete measurable goals that were required for calendar years 2004 and 2005.

Permit ID#	BMP ID	List Measurable Goal	Was goal met?			If not met briefly list reasons, current status, plans and new date for meeting the goal	TMDL?	
			YES	NO	ON-TRK		YES	NO
IV.B.1.b.1	1A, 1B	Implementation of activities undertaken to educate the community about storm water issues	X			URI-CE Agreement Storm Water Website; Storm water article; Winter Training		X
IV.B.1.b.2	1A, 1B	Implementation of public education activities to involve the community in the storm water program	X			URI-CE Agreement		X
B. ADDITIONAL MEASURABLE GOALS:								
	1A, 1B	Partner with URI Cooperative Extension to Provide Training to State and Municipal Officials and Coordinated Public Outreach Message. Measurable Goal: Execute MOA in Year 3; Receive deliverables on an agreed-upon timeline.	X			URI Agreement signed February 2006; workshops/training to be available in 2007 through 2009. Letter of invitation to municipal MS4s mailed February 2007. Attachment A provides measurable goals, deliverables, and progress.		X
	1C	Develop Website - Storm Water Page, SWMPP description, links, and Web-based resource library - guidance, curriculum. Measurable Goal: Storm Water page added to RIDOT website within Year 2.	X			Launched May 2006; Statewide notification via RIDOT Press Release in January 2007. http://www.dot.state.ri.us/programs/enviro		X
		Measurable Goal: Update regularly Year 3-5.	X					X
		Measurable Goal: 50 hits/1st year; 25 hits/yr	X			Counter available on website; >200 hits after press release		X
	1D	Publish storm water materials in DOA and RIDOT Newsletter. Measurable Goal: Develop and publish materials within Year 3.	X			Drafted in Year 3; published in Winter 2007 issue.		X
	1E	Continue Existing Program: RIDOT Winter Training existing program (Years 1 – 5) Measurable Goal: All pertinent employees trained.	X			RIDOT winter training program for erosion control, source reduction (annually).		X

	1F	Develop storm water training to be provided as part of the winter training program. Measurable Goal: Storm water training provided (Year 2 – 5)	X			National Highway Institute courses; URI training/workshops Year 3 through 5.		X
		Measurable Goal: All pertinent employees trained.	X			National Highway Institute courses; URI training/workshops Year 3 through 5.		X

II. OVERALL EVALUATION - PUBLIC EDUCATION AND OUTREACH:

A. GENERAL SUMMARY AND STATUS OF MEASURABLE GOALS:

(Note: Identify parties responsible for achieving the measurable goals and reference any reliance on another entity for achieving measurable goals)

RIDOT has signed an agreement with the University of Rhode Island Cooperative Extension for services to establish RIDOT compliance with obligations under Storm Water Phase II for *Public Education and Outreach* minimum measure and the *Public Involvement and Participation* minimum measure. DEM will provide technical assistance to RIDOT by reviewing URI's deliverables for technical accuracy and compliance with Storm Water Phase II to achieve approval. In undertaking this effort, RIDOT anticipates that a number of very valuable public education and outreach tools will be produced that will be applicable to the Storm Water Phase II needs of Rhode Island municipalities and that will be valuable to the general public as tools for managing storm water. Through this agreement, RIDOT will achieve full compliance with the *Public Education and Outreach* minimum measure. RIDOT also has several other BMPs that will be employed under this measure.

Each BMP will provide a positive impact to the environment by educating the target audience (State/Municipal Officials, RIDOT personnel, and the public) in recognizing causes and effects of storm water degradation. The success of the partnership with the URI Cooperative Extension will be determined by the submittal of deliverables in a timely manner, post-survey of those attending training sessions and pre- and post-survey of target audiences for public outreach efforts. All measures are still deemed appropriate. Effectiveness of these measures will be determined based on post-implementation outcome of URI Agreement.

Permit ID IV.B.1.b.1 - 7; BMP IDs 1A, 1B: The Office of Environmental and Intermodal Planning is responsible for partnering with the URI Cooperative Extension to provide training to State and municipal officials and create a coordinated public outreach message. The target audience consists of State and municipal officials, Watershed groups, residents, and RIDOT personnel. A draft proposal was submitted with RIDOT's Storm Water Management Plan. The RIDOT/DEM/URI Agreement was signed in February 2006, and educational materials and workshops will be available in Year 4. Various target pollutant sources will be addressed by this BMP. URI will provide printed materials, training workshops, and educational resources addressing pollution prevention topics for priority resources and specific audiences using templates that communities can use directly or adapt to local needs. These will incorporate a consistent message while targeting specific audiences. URI has provided an annual report and assessment to RIDOT, which provides the measurable goals set and agreed upon by RIDOT, RIDEM, and URI-CE in the contract agreement, and the success towards each. **ATTACHMENT A**

BMP ID 1C: The Office of Environmental and Intermodal Planning launched a storm water webpage on the RIDOT website in May 2006. A statewide Press Release announced the availability to the general public in January 2007. Municipal storm water coordinators have been notified via email of availability. The website provides a description of the Phase II program, RIDOT's SWMPP, Annual Reports, links to related sites, training opportunities, and a web-based resource library that includes the Soil Erosion and Sediment Control Handbook and the Storm Water Design Manual.
<http://www.dot.state.ri.us/programs/enviro> **ATTACHMENT B.**

BMP ID 1D: The Office of Environmental and Intermodal Planning and The Communications Office drafted a storm water article for publication in the DOA and RIDOT 2006 Winter newsletter. The target audience is State personnel. **ATTACHMENT C.**

BMP ID 1E, 1F: RIDOT has an existing winter training program for RIDOT personnel. This training includes storm water specific training as an integrated part of other courses.

Courses offered/attended by RIDOT personnel to augment the existing program in Year 3 included:

- The Blackstone River Coalition conference BETTER STORM WATER MANAGEMENT: MITIGATING FLOOD IMPACTS IN THE BLACKSTONE RIVER VALLEY (January 2006)
- RIDOT Internal Winter Training ROAD DRAINAGE WORKSHOP (February 2006)
- The National Highway Institute course DESIGN AND IMPLEMENTATION OF EROSION AND SEDIMENT CONTROL (March 2006)
- University of Rhode Island/Environmental Data Center seminar INTRODUCTION TO GPS FOR STORM WATER MANAGERS (June 2006)
- The Rhode Island Coastal Resources Management Council's (CRMC) TRAINING: LOW IMPACT DEVELOPMENT FOR GOVERNMENT (September 2006)
- The National Highway Institute course WATER QUALITY MANAGEMENT OF HIGHWAY RUNOFF (November 2006)
- URI Transportation Center/RI Public Works Association WINTER SNOW & ICE OPERATIONS (November 2006)
- RIDOT Internal Winter Training INTRODUCTION TO SNOW FIGHTING (November 2006)

The Natural Resources Unit has also been utilizing webcasts as part of its storm water training program. The Izaak Walton League of America (<http://www.iwla.org/>) has hosted several webcasts including a four-part series on **Alternative Practices to Manage Highway Runoff**. This program "outlined the latest techniques available to help transportation agencies save money, comply with water quality and water supply regulations, and improve water quality with context-sensitive storm water management practices, including low impact development techniques." The US EPA NPDES Program also offers training courses and workshops (<http://www.epa.gov/npdes/training>). RIDOT participated in several '101 programs' including developing an IDDE program, construction requirements, and effective post-construction programs.

In Years 4 and 5, the URI Cooperative Extension will also provide training and workshops to expand the existing program.

In addition to attending training sessions, the Natural Resources Unit has also provided public education/outreach

- RISD Department of Landscape Architecture & Industrial Design Innovation Studio 2006 LECTURE - The Runoff Dilemma: Paved and Sealed http://www.frcll.com/risd/fall_2006/ (October 2006)
- City of Central Falls, Rhode Island – OUTREACH re: Illicit Discharge Detection and Elimination; aided Central Falls Public Works Department in GPS locating, identifying, describing, and surveying of outfalls; continued support w/ Phase II requirements (November/December 2006)



MINIMUM CONTROL MEASURE #2: PUBLIC INVOLVEMENT/PARTICIPATION (Part IV.B.2 General Permit)

MEASURABLE GOALS:

NOTE: Report must be limited to activities implemented during the third year (calendar year 2006) of the program, which the permittee had listed as a measurable goal in the Storm Water Management Program Plan, or incomplete measurable goals that were required for calendar years 2004 and 2005.

Permit ID#	BMP ID	List Measurable Goal	Was goal met? ON- YES NO TRK			If not met briefly list reasons, current status, plans and new date for meeting the goal	TMDL?	
							YES	NO
IV.B.2.b.2. ii	2B	Implementation of public involvement activities and description of groups engaged	X			URI-CE to provide training, public outreach (Year 3-5)		X
IV.B.2.b.2. iii		Public notice of the draft annual report and provide the opportunity for public comment	X			Draft Annual Report for 2006 went through 30-day public notice before final submission to RIDEM.		X
B. ADDITIONAL MEASURABLE GOALS:								
	2A	Continue Existing Programs: Adopt a Highway/Spot. Provide bags, litter picks, transportation, and traffic control. Measurable Goal: Continuous Improvement	X			Program continued.		X
	2B	Proposed Program: Partner with URI Cooperative Extension to Provide Public Outreach Program Measurable Goal: Execute MOA in Year 3; Receive deliverables on an agreed-upon timeline.	X			Established partnership with URI in 2004; Agreement signed February 2006; see ATTACHMENT A for Detailed Progress Report		X
	2C	Continue Existing Program: Fund clean up efforts - Prison cleanup crews; Woonasquatucket River Cleanup Measurable Goal: Continuous Improvement	X			Program continued.		X
	2E	Continue Existing Program: Enhancement Program. Measurable Goal: Continue Funding	X			Program continued.		X

II. OVERALL EVALUATION - PUBLIC INVOLVEMENT/PARTICIPATION:

A. GENERAL SUMMARY AND STATUS OF MEASURABLE GOALS:

(Note: Identify parties responsible for achieving the measurable goals and reference any reliance on another entity for achieving measurable goals)

RIDOT has signed an agreement with the University of Rhode Island Cooperative Extension for services to establish RIDOT compliance with obligations under Storm Water Phase II for *Public Education and Outreach* minimum measure and the *Public Involvement and Participation* minimum measure. DEM will provide technical assistance to RIDOT by reviewing URI's deliverables for technical accuracy and compliance with Storm Water Phase II to achieve approval. In undertaking this effort, RIDOT anticipates that a number of very valuable public education and outreach tools will be produced that will be applicable to the Storm Water Phase II needs of Rhode Island municipalities and that will be valuable to the general public as tools for managing storm water. Through this agreement, RIDOT will not achieve full compliance with the *Public Involvement and Participation* minimum measure; therefore, RIDOT has several other BMPs that will be employed under this measure.

The success of the partnership with the URI Cooperative Extension will be determined by the submittal of deliverables in a timely manner, post-survey of those attending training sessions and pre- and post-survey of target audiences for public outreach efforts. The URI agreement was signed in February 2006. Educational materials should be available December 2006 and workshops will begin February 2007 and continue through 2009. This BMP will provide training and workshop opportunities for the public, State/Municipal officials, and RIDOT personnel, and is deemed appropriate for this measure. Effectiveness will be determined after the completion of the project.

Assessing the success of the public participation programs (Adopt-a-Spot/Highway; Enhancement Program) poses significant issues. These programs continue to be funded, but rely on the public to apply for inclusion into the program. RIDOT does not actively solicit applications. As such, RIDOT does not have control over the success of the programs. However, RIDOT will endeavor to provide information to other MS4 and RI municipalities regarding the programs in attempt to receive more applications. This will primarily be done on the new RIDOT Storm Water website <http://www.dot.state.ri.us/programs/enviro>

IV.B.2.b.2.ii; BMP ID 2B: The Office of Environmental and Intermodal Planning has developed a partnership with the URI Cooperative Extension to provide a public outreach program. The target audiences of this BMP include the public, State and municipal officials, environmental groups and educational organizations focusing on various pollutant sources. The URI agreement was signed in February 2006. URI has provided an annual report and assessment to RIDOT, which provides the measurable goals set and agreed upon by RIDOT, RIDEM, and URI-CE in the contract agreement, and the success towards each. Workshops will begin February 2007 through 2009. **ATTACHMENT A**

Permit ID IV.B.2.b.2.iii: The draft Annual Report for 2006 went through a 30-day public notice before final submission to RIDEM. See Section III.

BMP ID 2A: The Maintenance Division has continued with the Adopt-a-Highway and Adopt-a-Spot programs providing bags, litter pick-ups, transportation and traffic control. The target audiences of this BMP include the public, commercial and industrial businesses, trade associations, environmental groups and educational organizations. Litter is the target pollutant source for this BMP. The level of public participation determines the success of this goal.

The Adopt-A-Highway Program (AAH) is geared for non-profit, volunteer groups such as environmental groups, students, boy/girl scouts and civic minded businesses. The small signs are free to not-for-profit organizations and the large signs are a charge, RIDOT Maintenance Division fabricates and installs the signs for this program. The Sponsor is responsible to do 4 cleanups per year or whatever it takes to keep the segment clean, the actual Sponsor conducts the cleanups. The segments in the AAH Program are on secondary roads, no high speed routes or interstates. Adopt-a-Highway currently has 96 sponsors in the program and 192 miles are cleaned as a result.

The Sponsor-A-Highway Program (SAH) is geared toward businesses and there are currently two companies that the Department does business with, Adopt A Highway Maintenance Corporation and Adopt A Highway Litter Removal Service of America, Inc. Both are based out of California and they are active in many states. They charge a monthly fee to each Sponsor for the sign panel (*Catch the Wave Ride with Pride*) and they are obligated to clean each

segment 19 times per year. There is a set schedule for each company to follow and the cleanups take place on Mondays. Both companies send electronic cleanup reports. SAH has segments on all the major routes and interstates. Sponsor-A-Highway has 40 miles sponsored, out of a total of 119 total segments in the program. Therefore, 79 segments are available. Further program information is available at <http://www.dot.state.ri.us/programs/adoptaspot/> and <http://www.dot.state.ri.us/programs/adoptahwy/>

BMP ID 2C: The Maintenance Division has continued with cleanup efforts. The target audiences for this BMP include the public, neighborhood associations, environmental groups and educational organizations. Litter and bulky/solid waste are the pollutant sources of focus in this BMP. Prison Crew Cleanup efforts along RIDOT roadways in 2006 yielded **69,940 bags** of litter to be picked up and disposed of.

BMP ID 2D: Deleted per RIDEM

BMP ID 2E: The projects included in the Enhancement Program for the FY2006/FY2007 TIP were selected and recommended by RIDOT's Transportation Enhancement Advisory Committee (TEAC), which conducted a thorough solicitation, outreach, and proposal evaluation process during late 2004 and early 2005. Approximately 112 applications were received, in addition to the on-going program (carried forward from the previous TIP). This program continues on-going projects with \$13 million allocated for FY 2006 and 2007. It is anticipated that new projects will be added to the TIP in future years through an amendment process.

All enhancement projects listed in the TIP are initiated through the development of a project agreement with the sponsor and/or the commencing of the design process. The funds to be allocated for each project as well as the year of anticipated implementation is shown in the following table. The implementation schedule is based on the information available to RIDOT and is subject to change. To expedite program implementation, RIDOT is given flexibility in advancing projects within the annual Enhancement budget when other projects are delayed. **ATTACHMENT E**

SECTION III. Public Notice Information (IV.G.2.h and IV.G.2.i) *Note: attach copy of public notice – ATTACHMENT N

Date of Public Notice: February 28, 2007	How public was notified: Providence Journal Print Ad; RIDOT Website; MS4 Coordinators notified via email
Was public meeting held? YES <input type="radio"/> NO <input checked="" type="radio"/>	
Date:	Where:
Summary of public comments received: No comments received	
Planned responses or changes to the program: None required	



MINIMUM CONTROL MEASURE #3: ILLCIT DISCHARGE DETECTION AND ELIMINATION (Part IV.B.3 General Permit)

I. MEASURABLE GOALS:

NOTE: Report must be limited to activities implemented during the third year (calendar year 2006) of the program, which the permittee had listed as a measurable goal in the Storm Water Management Program Plan, or incomplete measurable goals that were required for calendar years 2004 and 2005.

Please Indicate:

If Illicit Discharge Detection and Elimination Ordinance was adopted:

☐ YES

☒ NO

If copy of ordinance or relevant portions were submitted with signed letter of City or Town Solicitor:

☐ YES

☒ NO

(If you answered NO to the above, please include the required documents with this Annual Report.)

Not applicable to RIDOT

I. MEASURABLE GOALS:

Permit ID#	BMP ID	List Measurable Goal	Was goal met?			If not met briefly list reasons, current status, plans and new date for meeting the goal	TMDL?	
			YES	NO	ON-TRK		YES	NO
IV.B.3.b.1	3A, B	Development of an outfall map showing the location of all outfalls and names of receiving waters		X		RIDOT will require the full 5-year permit period to locate all outfalls; RIDOT will complete Urban and Densely Populated Areas in Year 4; Divided & Limited Access Highways in Year 5; ATTACHMENT F	X	
IV.B.3.b.2		Tagging outfall pipes if GIS maps are not being developed	NA	NA	NA	GIS maps are being developed.		
IV.B.3.b.3	3C	Recording of additional elements, such as location of catch basins, manholes and pipes, on an on-going basis.	X			Incorporated into RIDOT IDDE Plan		X
IV.B.3.b.5. i	3Div	Implementation of strategies for locating priority areas which include areas with higher likelihood of illicit discharges	X			RIDOT developed an IDDE plan during Year 3 that addresses requirements under Permit ID# IV.B.3.b.5. ATTACHMENT G		X
IV.B.3.b.5. ii	3Div	Implementation of procedures for receipt and consideration of complaints	X					
IV.B.3.b.5. iii	3Div	Implementation of procedures for tracing the source of an illicit discharge	X					
IV.B.3.b.5. iv	3Div	Implementation of procedures for removing the source of the illicit discharge	X					
IV.B.3.b.5. v	3Div	Implementation of procedures for program evaluation and assessment	X					
IV.B.3.b.5. vi	3Div	Implementation of procedures for inspection of all catch basins and manholes for illicit connections and non-storm water discharges	X					

		Inspections taking place at least once (4th year)			X			
IV.B.3.b.5. vii	3Fii, 3Div	Implementation of procedures for conducting a minimum of two dry weather surveys, one between Jan 1 st and April 30 th and one between July 1 st and Oct 31 st . (Sanitary sewers - bacteria sampling is only required once between July 1 st and Oct 31 st)	X					
		Two dry weather surveys to be completed (4 th year)			X			
IV.B.3.b.7	3Div	Implementation of procedures for coordinating activities with physically interconnected MS4s, including state and federally owned or operated MS4s, when illicit discharges are detected or reported	X			RIDOT developed an IDDE plan during Year 3 that addresses requirements under Permit ID# IV.B.3.b.7. <u>ATTACHMENT G</u>		
IV.B.3.b.8	3Div	Implementation of procedures for referral to RIDEM of non-storm water discharges not authorized by this permit or a pre-existing permit	X			RIDOT developed an IDDE plan during Year 3 that addresses requirements under Permit ID# IV.B.3.b.8. <u>ATTACHMENT G</u>		X
IV.B.3.b.9	1A	Education of public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste as well as allowable non-storm water discharges found to be significant contributors of pollutants to the MS4	X			URI-CE Agreement <u>ATTACHMENT A</u>		
IV.B.3.b.10	3Div	Develop/implement procedures for tracking and recording actions to detect and address illicit discharges	X			RIDOT developed an IDDE program during Year 3 that addresses requirements under Permit ID# IV.B.3.b.10. <u>ATTACHMENT G</u>		X
B. ADDITIONAL MEASURABLE GOALS:								
	3A	Proposed Program: OUTFALL MAPPING						
	i Modifi ed	Select Consultant/Vendor to Map Storm Water Outfalls along divided – and limited-access highways (as part of the Asset Management RFP). Measurable Goal: Review RFP and Hire Consultant within Year 4.			X	An RFP is under review at the Federal Highway Administration.	X	
	ii -viii	Existing Program: Map outfalls by sub-basin			X	<u>ATTACHMENT H</u>	X	
	3B	Proposed Program: OUTFALL DATABASE						
	i modi- fied	Measurable Goal: Select Asset Management software within Year 2-3.		X		RFP is under review; contract award to occur in Year 4	X	

	iii-iv	Measurable Goal: Enter outfall field data collected into GIS Software (Year 3)	X			All field data entered into GIS Software as sub-basin is completed.		
	3C	Proposed Program: Develop procedure for recording "additional elements". Measurable Goal: Design policy memo developed by end of Year 3.	X			RIDOT developed an IDDE program during Year 3 that addresses this measurable goal. <u>ATTACHMENT G</u>	X	
	3D	ID Existing and plan for future connections						
	i	Existing Program: Drainage discharges to system accounted for through PAP system drainage. Volume limited by existing DPM. Measurable Goal: Continue existing program.	X			On-going program	X	
	ii	Proposed Program: Adopt/Evaluate Design Policy Memo for New Connections/Discharges to include geo-referencing. Measurable Goal: Revised DPM regarding drainage connections by end of Year 3.	X			New policy created and implemented in 2006 <u>ATTACHMENT I</u>	X	
	iii	Proposed Program: Identify Existing Connections/Discharges. Limited to review of PAP records for last three years and identification of significant contributors discharging to system. Measurable Goal: Identify existing connections/discharges by end of Year2.	X			Physical interconnections identified through review of PAP applications (2004, 2005); inspected, and mapped. <u>ATTACHMENT J</u>	X	
	iv NEW	Develop IDDE Program Measurable Goal: Develop IDDE program and Submit to RIDEM for review in Year 3	X			RIDOT developed an IDDE program during Year 3 and submitted to RIDEM for review; currently under internal review; anticipate implementation in Year 4. <u>ATTACHMENT G</u>		
	3E	Proposed Program: Survey outfalls for dry weather flow						
	i-v	Measurable Goal: Survey Outfalls to identify Dry Weather Flows	X			Dry weather flow surveys are completed during the outfall identification/mapping (MM 3A)	X	
	3F	Proposed Program: Sample Outfalls under Dry Weather Conditions					X	

	NEW	Measurable Goal: Purchase equipment to sample storm water outfalls with dry weather flow	X			RIDOT purchased equipment to sample and analyze dry weather flow for pH, temperature, and conductivity (as required by General Permit); bacterial analysis will be done by DOH laboratory.		
	i-vii	Measurable Goal: Sample outfalls			X	To be completed Year 4	X	

II. OVERALL EVALUATION - ILLICIT DISCHARGE DETECTION AND ELIMINATION:

A.GENERAL SUMMARY AND STATUS OF MEASURABLE GOALS:

(Note: Identify parties responsible for achieving the measurable goals and reference any reliance on another entity for achieving measurable goals)

Permit ID# IV.B.3.b.1; BMP ID 3A – Outfall Mapping: RIDOT is mapping its entire state-wide system, instead of just the system located in the Urban or Densely populated areas, as required by the Permit. This will require additional time, and was not completed by Year 3 (as required under the Permit). RIDOT chose to complete the inventory by drainage basins. The Office of Environmental and Intermodal Planning, supported by the MIS Office, has been inventorying outfalls through plan research and field data collection using GPS. The GIS database currently contains over 3000 mapped outfalls with associated photos.

RIDOT has decided to continue this program with summer interns, instead of hiring a contractor to survey and sample remaining outfalls (as previously reported) for the remaining outfalls easily accessible (i.e. non-divided highways). Outfalls on limited-access and divided highways will be mapped by a contractor for the Asset Management Program (to be installed in Maintenance, Year 4/5 (See BMP 5i, BMP 6R)).

See **ATTACHMENT H** for mapping status by RI watershed basin.

Permit ID# IV.B.3.b.2: Not applicable

Permit ID# IV.B.3.b.3; BMP ID 3C – Additional Elements: The Office of Environmental and Intermodal Planning has developed an IDDE plan, and this plan details the procedure for locating additional elements (catch basins, man holes, etc.), recording pertinent information about them and amending mapping to depict these features. The IDDE Plan is currently under internal review, and is anticipated to be implemented in Year 4. **ATTACHMENT G**

Drainage ponds were inventoried by the Design Office & the Natural Resources Unit through field data collection using GPS. A data dictionary has been set up to collect these features as polygons and generate a point feature for generalization. An inventory of storm water treatment units (STU) is completed. The STU GIS database was developed through field data collection by the Design Office with support by the GIS Office. As new STU are installed, the Design Office plans to locate them with GPS.

The Natural Resources Unit is working with a consultant to provide a detailed inspection report, maintenance schedule, and a biddable document for a 3-year maintenance contract for all of the storm water treatment units. The contract is anticipated to be awarded in Year 4, with completion in permit Year 5.

Permit ID# IV.B.3.b.4 – Develop/introduce ordinance: Not applicable to RIDOT

BMP ID 3B – Outfall Database: A spatial database has been created for the Outfall Locations. As mapping data is collected, the Natural Resource Unit and the GIS Office are responsible for updating the database. **ATTACHMENT F**

Asset Management: The GIS Office and the Maintenance Division have collaborated on the selection of Asset Management Software. RIDOT is currently in the

process of selecting a vendor/software. The Maintenance Division has formed an Asset committee and a RFP is anticipated to be going out for bid in the Summer of 2007 to acquire a consultant and asset management system. The Outfall data will be a subset of data in this database, as will 'additional elements' such as catch basins, drainage ponds, storm water treatment units, etc. At this time, it is anticipated that outfalls along limited-access and divided highways will be mapped and surveyed by this vendor.

BMP ID 3D – Existing/Future Connections: The Design Office oversees the drainage discharges to the RIDOT system accounted for through Physical Alteration Permits (PAP) system drainage. PAPs are required whenever a party with State-adjacent land wants curbcut access and/or drainage to the State system. The permit does not allow for additional net flow or volume to the RIDOT system. Tie-ins to the system are required to treat storm water. Existing connections/discharges into the RIDOT system were reviewed for the last three years. Each connection was inspected, GPSed, and documented.

The PAP records will also be reviewed when an illicit discharge is located to aid in identification of existing contributors.

A revised policy for PAP policy/regulation was established in Year 3 to include geo-referencing to facilitate mapping of "additional elements". **ATTACHMENT I**

Permit ID# IV.B.3.b.5, Permit ID# IV.B.3.b.7, Permit ID# IV.B.3.b.8, Permit ID# IV.B.3.b.10; (new) BMP ID 3Div – Develop IDDE Plan: RIDOT developed an IDDE program during 2006 that addresses requirements under the above Permit ID#s. The RIDOT IDDE Program was developed using New England Interstate Water Pollution Control Commission's Illicit Discharge Detection and Elimination Manual – A Handbook for Municipalities (January 2003), the Center for Watershed Protection Illicit Discharge Detection and Elimination – A Guidance Manual for Program Development and Technical Assessments (October 2004), and RIDEM IDDE workshop materials (December 2004). The IDDE manual was modified to reflect RIDOT authority and procedures. The Plan is currently under internal review, and has been previously forwarded to RIDEM for review. It is anticipated that the Plan will be implemented in Year 4.

ATTACHMENT G.

Permit ID# IV.B.3.b.9 – Educate public: This will be covered under the URI-CE Agreement; see Minimum Measure 1A.

BMP ID 3E – Outfall Surveys: Outfalls have been examined for dry weather discharges during the initial Outfall Mapping (BMP 3A) that occurred during dry weather conditions during between July and October each year. Outfalls that were determined to have dry weather discharge, or were unknown, will be re-visited before April 30th, 2007, and another dry weather survey will be conducted. If dry weather discharge is present, the flow will be sampled for pH, conductivity, temperature, and bacteria (see IDDE Plan – Attachment G).

BMP ID 3F – Outfall Sampling: The Office of Environmental and Intermodal Planning has purchased equipment to sample dry-weather-flowing outfalls for pH, conductivity, and temperature, as required by the General Permit. Sampling equipment was also purchased to obtain a water sample for bacterial analysis (to be done by the State DOH lab). Outfalls that were determined to have dry weather discharge, or were unknown, during the initial mapping and surveying will be re-visited before April 30th, 2007, and another dry weather survey will be conducted. If flow is present, sampling will be conducted in accordance with the IDDE Plan (Attachment G).

SECTION III.A Other Reporting Requirements - Illicit Discharge Inspections to Date (Part IV.G.2.m)

Total Illicit Discharges Identified: 0	# of Complaints Received: 2
# of Violations Issued: 0	# of Unresolved Violations Referred to RIDEM: 0
Summary of Enforcement Actions: 1. Complaint received was for illegal dumping of paint into a town storm sewer. Complaint was forwarded to Cumberland Dept. of Public Works. 2. RIDEM requested coordination b/t RIDOT and the town of Portsmouth re: illicit connections and Easton's Beach. NRU conducted an investigation with the Dept of Public Works Director, and identified storm sewer system components. Issues primarily from Town-connected system.	
Extent to which the MS4 system has been mapped: <div>See ATTACHMENT H – Mapping Status by Sub-Basin.</div>	

SECTION III.B Interconnections (Part IV.G.2.k and IV.G.2.l)

Interconnection:	Date Found:	Location:	Connectee:	Originating Source:	Planned and Coordinated Efforts and Activities with Connectee:
See ATTACHMENT J – PAPA Interconnections					



MINIMUM CONTROL MEASURE #4: CONSTRUCTION SITE STORM WATER RUNOFF CONTROL (Part IV.B.4 General Permit)

I. MEASURABLE GOALS:

NOTE: Report must be limited to activities implemented during the third year (calendar year 2006) of the program, which the permittee had listed as a measurable goal in the Storm Water Management Program Plan, or incomplete measurable goals that were required for calendar years 2004 and 2005.

Please Indicate:

If Construction Ordinance was adopted:

☐ YES

☒ NO

If copy of ordinance or relevant portions were submitted with signed letter of City or Town Solicitor:

☐ YES

☒ NO

(If you answered NO to the above, please include the required documents with this Annual Report.)

Not applicable to RIDOT

Permit ID#	BMP ID	List Measurable Goal	Was goal met?			If not met briefly list reasons, current status, plans and new date for meeting the goal	TMDL?	
			YES	NO	ON-TRK		YES	NO
IV.B.4.b.2		Implement policies and procedures for all construction projects disturbing ≥ 1 acre obtain appropriate State Permits	X			Appropriate State Permits are required for plan submission, reviewed by Natural Resources Unit.		X
IV.B.4.b.4		Implementation of program to review 100% of plans and SWPPPs for construction projects 1-5 acres not reviewed by other State Programs.	X			RIDOT Natural Resources Unit reviews all plans sent to regulatory agencies for permitting and all SWPPPs.		X
IV.B.4.b.7	4B	Inspect 100% of all construction projects within the regulated area that discharge or have the potential to discharge to the MS4	X			Erosion and pollution controls indicated on the Plans are approved by the Engineer before the commencement of any drainage, roadway, or bridge construction; NRU attends final inspections to inspect final stabilization of site.		X
B. ADDITIONAL MEASURABLE GOALS:								
	4A	Proposed Program: Review blue book and draft revision to make specification tighter. Measurable Goal: Outline for a revised specification available for use in Year 4.			X	Anticipate completion in Year 4.		X

	4B	Proposed Program: Modify standard specification to require erosion and sediment controls inspection a minimum of once per week, and during (or immediately after) each storm, or once per week during periods of dry weather or minor storms. Measurable Goal: Revised specification available for use in Year 4.			X	Anticipate completion in Year 4.		X
	4C	Proposed Program: Modify standard specification to require contractor to keep surplus erosion and sediment control materials on-site. Measurable Goal: Revised specification available for use in Year 4.			X	Anticipate completion in Year 4.		X
	4D	Proposed Program: Mandate BMP inspection schedule to be once per week by Wednesday. To be completed by the contractor per the specification. Measurable Goal: Revised specification available for use in Year 4.			X	Anticipate completion in Year 4.		X
	4E	Proposed Program: Revise WBS/DPM to include project specific inspection checklist to be developed during design phase, identifying BMPs by station and sensitive areas to be inspected. Checklist to be used by designated RIDOT or contractor personnel. Measurable Goal: Revised WBS available for use in Year 4.			X	Anticipate completion in Year 4.		X
	4F	Existing Program: Inspection program on project specific basis.	X			On-going program.		X
	4G	Existing Program: Erosion and sediment control inspection techniques provided at RIDOT winter training.	X			On-going program.		X
	4H	Existing Program: Standard specification requires contractor to control waste and dispose of properly.	X			On-going program		X

4I	Proposed Program: Modify RIDOT Policy to require preparation of SWPPPs for all projects to be included in Construction Documents (P,S&E) prepared by consultant during design phase. Contractor to sign NOI form and share liability. Measurable Goal: Revised WBS available for use in first quarter of Year 3.			X	RIDOT informally requires the preparation of SWPPPs for all construction projects requiring a RIPDES permit and between 1- and 5- acres		X
4J	Proposed Program: Develop a contract enforcement mechanism for RIDOT to enforce BMPs. Measurable Goal: Outline of enforcement procedure available in Year 3.			X	Anticipate to be completed in Year 4		X
4K	Proposed Program: Develop or contract for waste control training for RIDOT Resident Engineers and Inspectors. Measurable Goal: Training curriculum available for use in first quarter of Year 3.		X		URI-CE Agreement – URI training to start in Year 4		X
4L	Implement Training Program. Measurable Goal: Training curriculum in use in first quarter of Year 3.		X		URI-CE Agreement – URI training to start in Year 4		X
4M	Proposed Program: Meetings with contractor prior to construction commencement to review environmental constraints and conditions. Measurable Goal: Procedure developed for conducting pre-construction environmental meetings in Year 2.	X					X
4N	Proposed Program: pilot program kick-off meetings on three projects. Measurable Goal: Pre-construction environmental meetings held for three new projects during Year 3.	X					X
4O	Proposed Program: conduct meetings at project kick-off for 10 projects. Projects would be selected based on applicability. Measurable Goal: Pre-construction environmental meetings held for ten new projects during Years 3, 4 and 5.	X					X

II. OVERALL EVALUATION - CONSTRUCTION SITE STORM WATER RUNOFF CONTROL:

A. GENERAL SUMMARY AND STATUS OF MEASURABLE GOALS:

(Note: Identify parties responsible for achieving the measurable goals and reference any reliance on another entity for achieving measurable goals)

Permit ID IV.B.4.b.2 – Ensure appropriate State Permits are obtained - RIDOT requires the consulting firm submit application materials to the Natural Resources Unit for review before submission to appropriate State Agencies

Permit ID IV.B.4.b.4 – Procedures for plan and SWPPP review – All plans and SWPPPs submitted to State regulatory agencies (RIDEM, ACOE, CRMC, etc) are reviewed by Environmental Scientists within the Natural Resources Unit of the Office of Environmental and Intermodal Planning.

Permit ID IV.B.4.b.7 – Site inspection and enforcement of erosion and sediment control measures – According to the Blue Book specifications:

212.03 CONSTRUCTION METHODS. Erosion and pollution controls shall be maintained by the Contractor to the satisfaction of the Engineer. Erosion and pollution controls must be able to prevent, under normal weather conditions, both the movement of soil materials and the intrusion of sediment-laden discharges into environmentally sensitive areas. Construction shall not commence or continue until all specified erosion and pollution controls are in place, properly installed and accepted by the Engineer. Erosion and pollution controls shall be routinely inspected by the Engineer. The Engineer shall notify the Contractor immediately if problems develop. The Contractor shall commence cleaning and maintenance measures no later than the next consecutive calendar day after receiving a directive from the Engineer to perform such measures. The Contractor shall aggressively and expeditiously perform such cleaning and maintenance work until the original problem is remedied to the complete satisfaction of the Engineer. In the event of a weekend storm, the Contractor must have resources available to restore, and, if necessary, to replace any damaged controls.

Final Inspections, where site stabilization is inspected and accepted, are attended by Environmental Scientists from the Natural Resources Unit. If proper stabilization is not established, the contractor is notified and must remedy the issue before Final Acceptance is granted.

BMP ID 4A - E: – Current Specifications (Rhode Island DOT Standard Specifications for Road and Bridge Construction (i.e. 'Blue Book')) require erosion and sediment controls, proper disposal of waste, and inspections. Revised specifications will provide detailed measures and will provide enforcement repercussions. Revised specifications are anticipated for use in Year 4. The Design Office and the Office of Environmental and Intermodal Planning will be responsible for reviewing the blue book and drafting revisions to make the specification tighter.

The Natural Resources Unit (of the Office of Environmental and Intermodal Planning) meets with contractors prior to construction commencement to review environmental constraints and permit conditions. RIDOT reviews all applications submitted to RIDEM, CRMC, ACOE and USCG. Inter-Agency coordination meetings are held quarterly, or more frequently as necessary, to discuss and resolve construction-related issues.

Revisions include modifying the standard specification to:

- require the contractor to keep surplus erosion and sediment control materials on-site
- require inspection a minimum of once per week during or immediately after each storm or once per week during periods of dry weather or minor storms
- require weekly BMP inspections
- include a project specific inspection checklist to be developed during design phase, identifying BMPs by station and sensitive areas to be inspected

A revised specification anticipated to be available for use in Year 4. Currently, these revisions are informally required in SWPPPs.

BMP ID 4F: The Office of Environmental and Intermodal Planning is responsible for the existing inspection program on a project specific basis. Inspections are

currently performed on a complaint-driven basis. RIDOT will work towards a proactive inspection schedule with documentation.

BMP ID 4G: The Office of Environmental and Intermodal Planning is responsible for including erosion and sediment control inspection techniques at RIDOT winter training. This is accomplished through the use of National Highway Institute courses offered in cooperation with the URI Transportation Center. The URI-CE Agreement will also provide training to RIDOT personnel.

BMP ID 4H: Existing Program: The standard specification requires the contractor to control waste and dispose of it properly. The RIDOT Project Engineer will ensure that the construction contractor controls litter on the site.

BMP ID 4I: The Design Office and the Office of Environmental and Intermodal Planning requires preparation of SWPPPs for all projects to be included in Construction Documents (P,S &E) prepared by the consultant during the design phase. All SWPPPs are reviewed by the NRU.

BMP ID 4J: RIDOT will develop a contract enforcement mechanism to enforce BMPs relative to inspection, waste control, etc. as described in SWPPPs.

BMP ID 4K, 4L: The URI-CE Agreement will provide training to RIDOT personnel (Year 4-5)

BMP ID 4M, 4N, 4O: The Environmental and Intermodal Planning Department currently meets with contractors prior to construction commencement to review environmental constraints and permit conditions.

RIDOT NRU reviews all applications submitted to RIDEM, CRMC, ACOE and USCG. Inter-agency coordination meetings are held quarterly, or more frequently as necessary, to discuss and resolve construction related issues.

SECTION III. A Plan and SWPPP Reviews

of Construction Reviews completed: In 2006, there were 17 active construction projects that required SWPPPs; all SWPPPs reviewed by NRU

Summary of Reviews and Findings:

SECTION III.B Erosion and Sediment Control Inspections (Part IV.G.2.n)

of Site Inspections:

of Complaints Received:

of Violations Issued:

of Unresolved Violations Referred to RIDEM:

Summary of Enforcement Actions:

For every construction project that has a SWPPP, (17 active projects in 2006) site inspections are required weekly and during/within 24-hours after a 0.25-inch storm event. Monthly reports are forwarded to the Natural Resources Unit for review.



**MINIMUM CONTROL MEASURE #5:
POST CONSTRUCTION STORM WATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT
(Part IV.B.5 General Permit)**

I. MEASURABLE GOALS:

NOTE: Report must be limited to activities implemented during the third year (calendar year 2006) of the program, which the permittee had listed as a measurable goal in the Storm Water Management Program Plan, or incomplete measurable goals that were required for calendar years 2004 and 2005.

Please Indicate:

If Post - Construction Ordinance was adopted:

☐ YES

☒ NO

If copy of ordinance or relevant portions were submitted with signed letter of City or Town Solicitor:

☐ YES

☒ NO

(If you answered NO to the above, please include the required documents with this Annual Report.)

Not applicable to RIDOT

Permit ID#	BMP ID	List Measurable Goal	Was goal met?			If not met briefly list reasons, current status, plans and new date for meeting the goal	TMDL?	
			YES	NO	ON-TRK		YES	NO
IV.B.5.b.4		Review of 100% of plans for development projects one or more acres not reviewed by other State Programs	X			Plans reviewed by Natural Resources Unit		X
IV.B.5.b.10	5D, 5E	Post-construction inspections of BMPs and inspect 100% of all development \geq 1 acre that discharge or have the potential to discharge to the MS4.	X			Procedure in place. Will be implemented in Year 3 as part of asset management program.		X
IV.B.5.b.12	5C	Identification of existing storm water structural BMPs	X			Informal program in place – ongoing process.		X
B. ADDITIONAL MEASURABLE GOALS:								
IV.B.5.b.2	5A	Existing Program: Current RIDOT DPM requires that all new construction meet the State Water Quality Standards and redevelopment projects must incorporate retrofit actions to improve storm water quality to the maximum extent practicable.	X			On-going program.		X
	5B	Existing Program: Current maintenance practices include snow removal, street sweeping and catch basin cleaning.	X			A set of Winter Standard Operating Procedures are under internal review 2006/2007.		X

	5C	Existing Program: Location of Drainage Structures	X			Will be addressed in Measure 3C.		X
	5D	Proposed Program: Final Acceptance of Construction work by Maintenance Personnel. Audit to ensure project completeness. Measurable Goal: Maintenance division personnel present at final acceptance beginning third quarter of Year 3.	X			<u>ATTACHMENT K</u>		X
	5E	Proposed Program: Expanded As-Built Plan requirement. As-built plans would be prepared based on Resident Engineer's project diary, and made available to RIDOT staff, including maintenance through current plan file management system available on internal network. Measurable Goal: Develop an as-built plan policy during Year 3.			X	Implementation proposed for Year 4		X

II. OVERALL EVALUATION - POST CONSTRUCTION STORM WATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT:

A. GENERAL SUMMARY AND STATUS OF MEASURABLE GOALS:

(Note: Identify parties responsible for achieving the measurable goals and reference any reliance on another entity for achieving measurable goals)

Most measures are in place, however, the procedures and results are not documented. Data collection and tracking are not standardized, but it is anticipated that an Asset Management program (that will be implemented in 2006) will address this issue. Standard procedures will be developed in Year 3.

PERMIT ID: IV.B.5.b.2; BMP ID 5A: The Design Office is responsible for the continuation of the RIDOT DPM re: State water quality standards. Current RIDOT policy requires that all new construction meet the State water quality standards for pollutant removal from storm water and redevelopment projects must incorporate BMPs to improve storm water quality to the maximum extent practicable. Management of post-construction runoff is incorporated into project designs. The Design Office and the Office of Environmental and Intermodal Planning will coordinate to revise the DPM to make necessary changes for enforcement.

PERMIT ID: IV.B.5.b.3, PERMIT ID: IV.B.5.b.4, PERMIT ID: IV.B.5.b.5 - RIDOT's Natural Resource Unit reviews all construction design plans that require Permits from regulatory agencies (RIDEM, CRMC, Coast Guard, etc). The Natural Resource Unit also reviews plans for projects with >1-acre disturbance that do not require Permits from a Regulatory Agency. Pre-application meetings are attended on a project-by-project basis. RIDOT also coordinates a Quarterly Interagency Meeting with RIDEM, CRMC, Coast Guard, etc. to review projects.

PERMIT ID: IV.B.5.b.6 – RIDOT Maintenance Facilities had Storm water Pollution Prevention Plans and Spill Prevention Plans prepared for each Facility in 2004. The maintenance facilities and salt storage facilities are the only facilities that RIDOT would have to manage storm water discharges that could fall under Industrial Discharge. RIDOT construction projects with industrial discharges are limited to Maintenance Facilities and Salt Storage Facilities. Facility SWPPPs and SPPs have been submitted to DEM. Any future facilities will have a SWPPP created and submitted to DEM.

PERMIT ID: IV.B.5.b.9 – RIDOT does not have regulatory authority, and therefore cannot create an ordinance to regulate post-construction runoff. However, current RIDOT Standard Specifications require measures to address post-construction runoff, and every contract must meet these Standards.

PERMIT ID: IV.B.5.b.10, BMP ID 5D: The Finals Section notifies the relevant Offices (the Office of Environmental and Intermodal Planning, the Design Section, and the Maintenance Division) and representative personnel are present at final inspection of construction work. This facilitates understanding of drainage systems, and improves knowledge of system components. The Maintenance Division attended 34 Final Inspections in 2006. **ATTACHMENT K**

PERMIT ID: IV.B.5.b.11 – Long-term O&M of storm water BMPs will be ensured through the Asset Management Program in the Maintenance Division. When implemented, contractors will be responsible for maintaining assets (from guard-rails to drainage structures) along sections of RIDOT maintained roadways.

PERMIT ID: IV.B.5.b.12, BMP ID 5C: The Office of Environmental and Intermodal Planning, the MIS Office, and the Design Office are responsible for obtaining the location of drainage structures.

A storm water treatment units (swirl-chambers, treatment ponds, etc) inventory has been completed in Year 3. The STU GIS database was developed through field data collection by Design and the NRU, with support by GIS. As new STU are installed Design plans to locate them with GPS.

Catch basins have been identified through Right-of-Way images by the GIS Office along NHI roadways. Future Right-of-way imaging may capture catch basins along ramps and other RIDOT maintained roadways.

Other drainage structures will also be identified under the new Asset Management Program that is anticipated to be implemented in Years 4/5.

BMP ID 5B: The Maintenance Division is responsible for snow removal, street sweeping and catch basin cleaning. Sweeping and catch basin cleaning work is completed on an as needed/ as possible basis. Completion of work is dependent on available manpower. A set of Standard Operating Procedures is anticipated to be drawn up in 2007. Data collection will be available with the implementation of the Asset Management Program in Year 4.

BMP ID 5E: The Construction Section will implement an as-built plan requirement. As-built plans would be prepared based on Resident Engineer's project diary and made available to RIDOT staff, including maintenance through a current plan file management system available on the internal network. As-built plans depict the project as actually constructed. This will facilitate location and mapping of "additional elements" and maintenance. The as-built plan policy will be developed in Year 3 and implemented during Year 4. The Chief Engineer will be responsible for evaluating the effectiveness of the as-built plan policy and will revise or abandon it as deemed necessary. The effectiveness of the policy will be evaluated during Year 5 and the program will be revised or abandoned as appropriate.

SECTION III.A. Plan and SWPPP Reviews

of Post-Construction Reviews completed:

Summary of Reviews and Finding:

As-Built Plan Reviews are anticipated to be implemented in Year 4/Year5

SECTION III.B. Post Construction Inspections: Proper Installation of Structural BMPs (Part IV.G.2.o)

# of Site Inspections: 34	# of Complaints Received: unknown
# of Violations Issued: 0	# of Unresolved Violations Referred to RIDEM: 0
Summary of Enforcement Actions: See Attachment K for Maintenance Division attendance at Final Inspections; Each division in RIDOT is invited to Final Inspections – will report each Division next Annual Report	

SECTION III.C. Post Construction Inspections: Proper Operation and Maintenance of Structural BMPs (Part IV.G.2.p)

# of Site Inspections: 34	# of Complaints Received: unknown
# of Violations Issued: 0	# of Unresolved Violations Referred to RIDEM: 0
Summary of Enforcement Actions: See Attachment K for Maintenance Division attendance at Final Inspections; Each division in RIDOT is invited to Final Inspections	



MINIMUM CONTROL MEASURE #6: **POLLUTION PREVENTION AND GOOD HOUSEKEEPING IN MUNICIPAL OPERATIONS (Part IV.B.6 General Permit)**

I. MEASURABLE GOALS:

Permit ID#	BMP ID	List Measurable Goal	Was goal met?			If not met briefly list reasons, current status, plans and new date for meeting the goal	TMDL?	
			YES	NO	ON-TRK		YES	NO
IV.B.6.b.1.i	6R	Identification, location and description of all structural BMPs	X					X
IV.B.6.b.1.ii	6R	Inspection and cleaning of BMPs	X					X
IV.B.6.b.1. iii	6L	Annual catch basin inspection and cleaning	X			Program in place - informal procedure. Cleaning prioritized based on schedule and complaints received. Opportunistic cleaning performed as part of every roadway construction on reconstruction (1R, 2R, 3R) projects.		X
IV.B.6.b.1. vi	6T	Annual road sweeping of all streets and roads within the regulated area annually	X					X
IV.B.6.b.1. vii		Maintenance activities, schedules and long-term inspection procedures for controls to reduce floatables		X		Procedure evaluated but determined to be infeasible.		X
IV.B.6.b.4		Activities implemented for O&M and good housekeeping program for non-industrial facilities with the potential to introduce pollutants	X			Facilities have SWPPPs and SPCCs.		X

B. ADDITIONAL MEASURABLE GOALS:

	6A	Existing Program: Signage in Low Salt Areas	X			On-going program.		
	6B	Existing Program: Use of straight salt for de-icing on interstates and heavily traveled roadways. Reduces sedimentation and clean up requirements of sand applications.	X			On-going program.		
	6Bi	Proposed Program: Investigate developing an Anti-Icing Management Program Measurable Goal: Equipment investigated and evaluated by end of Year 5.	X			Anti-icing program in place.		
	6C	Existing Program: Winter training for RIDOT Maintenance Personnel.	X			On-going program; to be augmented with URI-CE Agreement Training/Outreach		

	6D	Proposed Program: Develop storm water training program to be included in current training sessions.	X			URI Agreement will provide storm water training beginning 1 st quarter Year 4 - 5. NHI Courses available in Year 3 – 5.		
	6E	Proposed Program: Implement storm water training. Measurable Goal: Storm Water training curriculum included in winter training during the first quarter of each year beginning Year 3.	X			NHI Courses available in Year 3 – 5; URI-CE Training to be provided Year 4-5.		
	6F	Existing Program: All Water Quality Units statewide inspected September 2002. Measurable Goal: Inspect Annually		X		Water quality units are not inspected annually or cleaned when necessary due to lack of equipment and manpower.		
	6G	Proposed Program: Rent equipment to clean Water Quality units and evaluate need to purchase equipment or subcontract the cleaning to a contractor. Measurable Goal: Cleaning equipment rented, used and evaluated. Decision made on future cleaning practices by end of second quarter of Year 3.	X			Determined to hire consultant to inspect all storm water treatment units and provide O&M schedule for each; Anticipate to award contract in Year 4, complete in Year 5; Hire contractors to maintain 2009		
	6H	Proposed Program: Implement Water Quality Unit cleaning program Measurable Goal: Water Quality unit cleaning program in use beginning in third quarter of Year 3. All vortechs units to be inspected once annually and cleaned in accordance with manufacturer's specifications.		X		Inspection and cleaning schedule to be completed in Year 4/5.		
	6I	Proposed Program: Develop a Standard Operating Procedure for maintenance of swales. Measurable Goal: Develop standard operating procedure by end of first quarter of Year 3.		X		To be done under BMP ID 6G.		
	6J	Implement Standard Operating Procedure. Measurable Goal: Standard Operating Procedure in use beginning in third quarter of Year 3.		X		To be done under BMP ID 6G.		
	6K	Existing Program: Northwest division all CBs cleaned within last three years. Newport division all CBs within last 2 years. Measurable Goal: Maintain cleaning frequency.	X			On-going program.		
	6L	Proposed Program: 600 catch basins will be cleaned annually statewide as manpower is available. Priority will be established based on results of cleaning records. Measurable Goal: 600 catch basins cleaned each year of Years 2 – 5.	X			Program in place – informal procedure. Cleaning prioritized based on schedule and complaints received.		

	6M	Proposed Program: Inventory existing detention basins. Measurable Goal: Database of detention basin locations by end of second quarter of Year 3.	X					
	6N	Proposed Program: Develop inspection, maintenance, and mowing protocol for Detention Basins. Measurable Goal: Detention basin inspection and maintenance protocol available for use by second quarter of Year 3.			X	Consultant to provide O&M under BMP ID 6G		
	6O	Implement Protocol. Measurable Goal: Begin inspecting and maintaining detention basins. Ten (10) basins to be inspected annually beginning in first quarter of Year 4 and cleaned as necessary.	X			Basins inspected by NRU in Year 3. Consultant to provide O&M under BMP ID 6G		
	6P	Proposed Program: Develop Standard Operating Procedure for maintaining drainage structures in wetlands. Measurable Goal: Standard operating procedure approved by RIDOT by end of Year 3.		X		Consultant to provide O&M under BMP ID 6G		
	6Q	Proposed Program: Negotiate Memorandum of Agreement with RIDEM for maintaining drainage structures in wetlands. Measurable Goal: Begin negotiating MOA with RIDEM during first quarter of Year 3.		X				
	6Ri	Proposed Program: Develop method for tracking inspections of drainages structures. Measurable Goal: Evaluate current record keeping practices during Year 2.	X			Asset Management Program will provide locating of, inspection of, and tracking of O&M of drainage structures.		
	ii	Measurable Goal: Conduct needs assessment regarding asset management software during Year 3.	X			Asset Management Program will provide locating of, inspection of, and tracking of O&M of drainage structures.		
	iii	Measurable Goal: Evaluate needs for computer hardware to support record keeping and inspection effort. Requisition new equipment during Year 3.			X	Asset Management Program under review		
	iv	Measurable Goal: Implement new record keeping programs including software and hardware during Year 4.			X	Asset Management Program under review; anticipate implementation Year 4/5		
	6S	Proposed Program: Develop a procedure for minimizing erosion of roadway shoulders. Measurable Goal: Develop SOP to identify, investigate problem and incorporate repair into construction contracts.	X			Problems addressed through construction projects. Working with URI turf science department to develop a salt tolerant, low irrigation requiring turf for road shoulders.		

	6T	Existing Program: Sweeping completed statewide on annual basis. Work order program currently in use allows for response to complaints. Measurable Goal: Track complaints and prioritize sweeping based on need.	X			Program in place.		
	6U	Proposed Program: Investigate feasibility of more frequent sweeping. Measurable Goal: Feasibility assessment complete in Year 3.	X					

II. OVERALL EVALUATION - POLLUTION PREVENTION AND GOOD HOUSEKEEPING IN MUNICIPAL OPERATIONS:

A.GENERAL SUMMARY AND STATUS OF MEASURABLE GOALS:

(Note: Identify parties responsible for achieving the measurable goals and reference any reliance on another entity for achieving measurable goals)

Currently the RIDOT Maintenance Division keeps hard-copy records regarding work order requests for maintenance of DOT structures (road sweeping, catch basins, etc.) . The current record keeping practice is effective for dealing with complaints and work orders, however it is not useful for data collection and analysis. The investigation and development of an Asset Management Program began in Year 2. The Maintenance Division, along with the Contracts and Specifications Section, is currently developing a Scope of Work to advertise for an Asset Management consultant to assist in the development of a comprehensive inventory of RIDOTs assets and necessary tools to maintain the database. The RFP is currently under internal review. A consultant is anticipated to be selected in Year 4 and the contract to be awarded in Year 4. This program will enable RIDOT to better maintain and track this data. Until the Software is installed, RIDOT may only be capable of providing a limited amount of supporting data for many of the Good Housekeeping measures (inspections, cleaning activities, complaints).

BMP ID 6A: The Maintenance Division is responsible for maintaining the signage in Low Salt Areas.

BMP ID 6B: The use of straight salt for de-icing on interstates and heavily traveled roadways reduces sedimentation and cleanup requirements of sand applications. An ANTI-ICING program is in place. Anti-icing practices include pre-treating roadways with an Anti-Icing solution. This reduces the amount of salt and sand required during the storm event. Anti-Icing equipment is being purchased as replacement of older vehicles. As the vehicle capability increases, so will the anti-icing program. A Winter Snow and Ice Operations Manual is currently under review, and will provide detailed information on this program next year.

BMP ID 6C, 6D, 6E: The existing winter training program for the RIDOT personnel includes erosion control and source reduction. The University of Rhode Island Cooperative Extension will develop a storm water training program that RIDOT personnel will attend (available Year 4). The National Highway Institute (NHI) offers courses in Storm Water, and RIDOT coordinates these offerings with the assistance of URI's Transportation Center. These courses will be offered in Years 3 – 5 (See Minimum Measure 1).

BMP ID 6F, 6G, 6H: It has been decided that the Office of Environmental and Intermodal Planning will be responsible for contracting with a consultant to provide RIDOT with an O&M schedule for the storm water treatment units (swirl-chambers, treatment ponds, swales, etc.). The consultant will inspect each unit, develop maintenance instructions and schedule, and provide a biddable document that RIDOT can use to contract out the maintenance of treatment units. Currently, the contract with the consultant is under review, and is anticipated to be awarded in the Spring of Year 4. Inspections are anticipated to be completed in Year 4.

BMP ID 6I, 6J: A Standard Operating Procedure (SOP) will be developed for maintenance of swales while minimizing disturbance to sensitive areas as part of BMP ID 6G.

BMP ID 6K, 6L: The Maintenance Division is responsible for cleaning catch basins. Each Maintenance District has different schedules, abilities, and protocols for cleaning catch basins. Catch basins are primarily cleaned through a complaint-driven process and opportunistic maintenance/construction projects.

TOTAL Catch Basins Cleaned (2006): 4,242

Belleville Facility: 289

E. Providence Facility: 95

Glocester (Northwest) Facility: 1103

Hope Valley Facility: 208

Lincoln Facility: 189

Midstate Facility: 735

Portsmouth (Newport) Facility: 1623

BMP ID 6M, 6N, 6O: The Maintenance Division, MIS, and Office of Environmental and Intermodal Planning are responsible for inventorying existing detention basins. This will be completed as part of the Asset Management Software implementation. RIDOT will develop inspection, maintenance and mowing protocol for ensuring proper function and maintenance of detention basins. The protocol will be available for use by the second quarter of Year 3. A goal of ten basins inspected annually beginning in the first quarter of Year 4 and cleaned as necessary will be established. Data collection will be available with the implementation of the Asset Management Software in Year 4.

BMP ID 6P, 6Q: The Office of Environmental and Intermodal Planning will contract with a consultant (BMP ID 6G) to develop an SOP for maintaining drainage structures in wetlands.

BMP ID 6R: The Asset Management Program is under review, and implementation is anticipated in Year 4. Hardware and software requirements will be determined under the program.

BMP ID 6S: RIDOT is working with the University of Rhode Island to develop a slope stabilizing, salt tolerant grass mix. The study with URI on the Salt Tolerant Grass Mixes is entitled Evaluation of Native Grasses for Highway Slope Stabilization and Salt Tolerance. It is a 2-year study and will be conducted with Dr. Rebecca Brown from URI. It will start in Spring 2006 and the final results will be published in Oct of 2008. The purpose of the study is to help develop a grass seed mix that we can use along the highway, especially at the road edge, where grass is being killed by the winter salt. It would be advantageous to have a grass seed mix that will grow in this 20 foot zone, so erosion of the road edge would not occur. Another part of this study is to help develop a seed mix that consists of native grasses that are deep rooted for use on steep slopes to help prevent erosion. This would be used in rural areas and would possibly not be mowed. This project is funded with research monies from FHWA.

The Office of Environmental and Intermodal Planning is working on specifications which can be used in our construction contracts for the use of composted sewage sludge (Class A Biosolids) as a soil amendment. It will be used only on the Interstate or Limited Access Highway (i.e. Rte 10). After the specs are written, there are multiple layers within RIDOT and the construction industry that must review and approve it before it becomes a Standard Specification. Anticipated to occur in Year 4.

BMP ID 6T, 6U: The Maintenance Division is responsible for the sweeping of State maintained roadways on an annual basis. 100% of roadways are systematically swept; secondary sweeping (and above) are based upon complaints and general need. The work order program currently in use allows for response to complaints. Currently, RIDOT has insufficient resources to conduct roadway sweeping more than once per year other than as a response to complaint or need.

TOTAL Miles Swept Cleaned (2006): 4,628 miles

Belleville Facility: 385

E. Providence Facility: 537

Glocester (Northwest) Facility: 439

Hope Valley Facility: 901

Lincoln Facility: 497

Midstate Facility: 980

Portsmouth (Newport) Facility: 889

SECTION III.A Structural BMPs (Part IV.B.6.b.1.i)

BMP ID:	Location:	Name of BMP Owner/Operator:	Description of BMP:
		See Attachment L	

SECTION III.B Discharges Causing Scouring or Excessive Sedimentation (Part IV.B.6.b.1.v)

Outfall ID:	Location:	Description of Problem:	Description of Remediation Taken, include dates:	Receiving Water Body Name/Description:
		Inspected during MM3: Outfall Mapping; Number to be determined in Year 4		

SECTION III.C Note any planned municipal construction projects/opportunities to incorporate water quality BMPs, low impact development, or activities to promote infiltration and recharge (Part IV.G.2.j).

All construction projects are designed to minimize storm water impacts to the environment to the maximum extent practical.

SECTION III.D Please include a summary of results of any other information that has been collected and analyzed. This includes any type of data (Part IV.G.2.e).

None



PART III: ADDITIONAL ANNUAL REPORT REQUIREMENTS

SECTION I. Please provide an assessment of the progress towards meeting the requirements for the control of storm water identified in an approved TMDL (Part IV.G.2.d).

The **storm water retrofit program** utilized a stakeholder group to prioritize the Storm Drain Retrofit Demonstration Program outfall selection process. This stakeholder group included the Rhode Island Department of Environmental Management, Federal Environmental Protection Agency, Save the Bay, and community representatives from Cranston, Warwick, and West Warwick, as well as representatives from the Pawtuxet River Authority. It was mutually agreed that RIDOT would proceed with the design and construction of five outfalls on the Pawtuxet River as a first priority. A Design Study Report for the remaining fifteen outfalls from the original University of Rhode Island study was prepared. During FY2003, the Department procured additional consultant services through an RFP process. Crossman Engineering was the selected consulting firm and design efforts on additional storm water projects began in FY2004. RIDOT will continue to advance storm water abatement components that are prioritized with RIDEM. Future elements for incorporation into RIDOT's program will include recommendations from federally approved TMDL studies that are prioritized with RIDEM. **ATTACHMENT M**

Additionally, each construction project is designed and reviewed utilizing the *RI Stormwater Design & Installation Standards Manual* and the *RI Soil Erosion Sediment Control Handbook*. Each project incorporates storm water BMPs to the maximum extent practicable. TMDLs are consulted during the design of new projects to determine if conditions at any priority outfalls may be improved during project construction.



RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Office of Water Resources



INSTRUCTIONS FOR THE RI POLLUTANT DISCHARGE ELIMINATION SYSTEM (RIPDES) SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEMS AND INDUSTRIAL ACTIVITY AT ELIGIBLE FACILITIES OPERATED BY REGULATED SMALL MS4s ANNUAL REPORT FORM

WHO MUST SUBMIT AN ANNUAL REPORT:

Owners/Operators of regulated small municipal separate storm sewer systems (MS4s) and industrial activities authorized to discharge storm water under the Rhode Island Pollutant Discharge Elimination System (RIPDES) Storm Water General Permit for Small Municipal Separate Storm Sewer Systems and Industrial Activity at Eligible Facilities Operated by Regulated Small MS4s, must submit an Annual Report, outlined in Part IV.G of the permit. The Report must be submitted each year after permit issuance by March 10th to track progress of compliance. If you have questions regarding this Annual Report Form contact Margarita Chatterton of the Rhode Island Department of Environmental Management (RIDEM), Office of Water Resources, Permitting Section at (401) 222-4700 ext. 7605.

The Annual Report must be submitted to:

RIDEM
Office of Water Resources
RIPDES Program
Permitting Section
235 Promenade Street
Providence, RI 02908
ATTN: Margarita Chatterton

INSTRUCTIONS FOR COMPLETION:

GENERAL INFORMATION PAGE:

"RIPDES Permit #"

Include your permit ID # to ensure proper tracking.

"Reporting Period"

Please check the appropriate annual reporting period.

"Operator of MS4"

Give the legal name of the person, firm, public (municipal) organization, or any other entity that is responsible for day-to-day operations of the MS4 described in this application (RIPDES Rules 3 & 12). Enter the complete address and telephone number of the operator. Circle the appropriate choice to indicate the legal status of the operator of the MS4.

"Owner of MS4"

If the owner is the same as the operator do not complete this section. Give the legal name of the person, firm,

public (municipal) organization, or any other entity that owns the MS4 described in this application (RIPDES Rules 3 & 12). Do not use a colloquial name. Enter the complete address and telephone number of the owner.

"Certification"

State and federal statutes provide for severe penalties for submitting false information on this application form. State and federal regulations require this application to be signed as follows (RIPDES Rule 12);

For a corporation: by a responsible corporate officer, which means: (i) president, secretary, treasurer, or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision making functions, or (ii) the manager of one or more manufacturing, production, or operating facilities, provided the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information or permit application requirements; and where authority to sign documentation has been assigned or delegated to the manager in accordance with corporate procedures;

For a partnership or sole proprietorship: by a general partner or the proprietor;

For a Municipality, State, Federal or other public site: by either a principal executive officer or ranking elected official.

PART 1- MEASURABLE GOALS:

One page, front and back, is provided to report on the status and effectiveness of measurable goals which have been developed to aid the implementation of strategies, procedures, and programs used to achieve each of the six minimum control measures in Part IV.B of the General Permit. Please type or print in the appropriate areas only. If additional space is needed please submit attachments to the appropriate minimum control measure following the format provided.

The first section entitled "Required Measurable Goals" include mainly strategies, procedures, and programs

which **MUST** be developed/implemented by a specific year as mandated by the permit.

The second section entitled “Additional Measurable Goals” provides space to include your own MS4-specific measurable goals not prescribed in the permit (though noted in your Storm Water Management Program Plan), but are intended to aid in the implementation of strategies, procedures, and programs outlined in the permit to comply with each minimum measure.

Example: Public Education and Outreach

“Required Measurable Goals”- Sections IV.B.1.b.2 and IV.B.1.b.4 are considered “Required Measurable Goals” because strategies on how to inform the community on how to become involved in the storm water program and how operators will utilize partnerships, and strategies to list target pollutant sources **MUST** be developed within the first year. These are considered “Required Measurable Goals” because the development of such strategies has a deadline.

“Additional Measurable Goals”- Any further establishment of deadlines, percentages, etc. used to aid the implementation of strategies, procedures, or programs are considered “Additional Measurable Goals.” Examples may include: informing 70% of residents about proper fertilizer use; introduction of an ordinance to control pet waste by the end of the third year. These would classify as “Additional Measurable Goals” because they are not prescribed by the permit but are fulfilling overall minimum measure requirements.

“Permit ID #”

The Permit ID # is the part of the permit where you can find a listing or description of the required measurable goal.

“BMP ID #”

The BMP ID # refers to the number assigned to a specific requirement or BMP and reported to the Department in the Storm Water Management Program Plan.

“List Measurable Goal”

A brief description of the measurable goal with the year it must be completed by in parentheses.

“Was Goal Met?”

- Check YES if...the goal was accomplished in its entirety on or before schedule.
- Check NO if...the goal was not met in its entirety on schedule.
- Check ON TRACK if...you are currently working to complete the goal on schedule.

“If not met...”

Complete this section only if you have checked NO or ON TRACK in the previous section. If you have not met the measurable goal on time OR are on track with meeting the measurable goal on time, please provide a brief

description as to why the goal has not been met, the current status of actions needed to meet the goal, any current plans, and the date you foresee the goal to be completed by. Please keep this section brief. Additional space is available on the reverse side to expand.

“Effective”

To the best of your knowledge please note if the measurable goal has been effective.

“TMDL”

Please note if the completion of this measurable goal will satisfy a remedial requirement of an approved TMDL. Please see Addendum A for additional requirements.

PART II- OVERALL EVALUATION:

This section provides narrative space for a more descriptive explanation and evaluation of the actions taken to satisfy each of the minimum control measures. After evaluation, it may be necessary to make changes or modifications to your Implementation Schedule if the time frame, appropriateness or effectiveness cannot be assured. If so, please include descriptions of changes or modifications, and detailed justification in the appropriate sections.

“General Summary and Status of Measurable Goal”

Please provide a general summary of actions taken (implementation of BMPs, development of procedures, events, etc.) to meet the measurable goals of the minimum measure. Please note how successful those actions were on the overall minimum control measure. Be sure to identify parties responsible for achieving each measurable goal and reference any reliance on another entity for achieving any measurable goal.

Describe whether each measurable goal was completed within the time proposed in the MS4 General Permit or your Storm Water Management Program Plan (SWMPP). Why or why not? Provide a progress report and discussion of activities that will be carried out during the next reporting cycle to satisfy the requirements of the minimum measures. Also include a discussion of any proposed changes to BMPs or measurable goals.

“Appropriateness and Effectiveness ”

Assess the appropriateness of the actions taken to meet the requirements of the minimum measure. In determining appropriateness you may want to consider, but not limited to, the local population, pollution sources, receiving water concerns, integration with local management procedures, and available resources.

Also, discuss the effectiveness of the implementation of BMPs to meet the requirements of the minimum measure and the overall effectiveness of the minimum measure. Describe your progress towards achieving the overall goal of reducing the discharge of pollutants. Please include assessment parameters/indicators used to measure the success of the minimum measure.

PART III- ADDITIONAL ANNUAL REPORT REQUIREMENTS

Section 1:

Complete this section only if your MS4 is subject to an approved TMDL and you have checked the TMDL column in Part I of the Annual Report if any measurable goal satisfies requirements of an approved TMDL. Be sure to identify the approved TMDL and assess the progress towards meeting the requirements for the control of storm water (Part IV.G.2.d).

Section 2:

Specify the date of and how the annual report was public noticed. If a public meeting was needed, provide the date and place. Include a summary of public comments received in the public comment period of the draft annual report and planned responses or changes to the program (new or revised BMP's and measurable goals, partnerships, etc.). Be sure to attach a copy of your public notice (Part IV.G.2.h and IV.G.2.i).

Section 3:

As noted in Part IV.G.2.j of the General Permit, specify any planned municipal construction projects or opportunities to include water quality BMPs, low impact development, or seek to promote infiltration and recharge.

Section 4:

List location, date found, operator of the physically interconnected MS4, and originating source of newly identified physical interconnections with other small MS4s. Also note any planned or coordinated activities with the physically interconnected MS4 (Part IV.G.2.k and IV.G.2.l).

Section 5:

Provide the number of illicit discharges identified, complaints received, violations with a summary of enforcement actions, and unresolved violations that have been referred to RIDEM. Include a short narrative describing the extent to which your system has been mapped (Part IV.G.2.m).

Section 6:

Identify the number of construction and post-construction plan and SWPPP reviews completed and any further information. This includes, but not limited to a summary of the reviews, responsible parties, and types of projects reviewed.

Section 7:

Construction inspection information for erosion and sediment control should be submitted annually as stated in Part IV.G.2.n. Provide a summary of the number of site inspections conducted, inspections that have resulted in enforcement actions, violations that have been resolved and those unresolved, referred to RIDEM.

Section 8:

Post construction inspection information for proper installation of post construction structural BMPs should be submitted annually as stated in Part IV.G.2.o. This should provide a summary of the number of site inspections conducted, inspections that have resulted in enforcement actions, violations that have been resolved and those unresolved, referred to RIDEM.

Section 9:

Inspection information for proper operation and maintenance of post construction structural BMPs should be submitted annually as stated in Part IV.G.2.p. This should provide a summary of the number of site inspections conducted, inspections that have resulted in enforcement actions, violations that have been resolved and those unresolved, referred to RIDEM.

Section 10:

As prescribed in Part IV.B.6.b.1.i of the General Permit, the MS4 operator must identify and list the specific location and a description of all structural BMPs in the SWMPP at the time of application and update the information in the annual report.

Section 11:

Part IV.B.6.b.1.v of the Permit states to identify and report annually, as part of the annual report, known discharges causing scouring at outfall pipes or outfalls with excessive sedimentation. Include Outfall ID #, location, description of the problem, any remediation taken, and the ultimate receiving water body.

Section 12:

Please include a summary of results of any other information that has been collected and analyzed. This includes any type of data, including, but not limited to, dry weather survey data (Part IV.G.2.e).

