

RIDOT

IDDE Compliance Update Report No. 10

January 1, 2024 – June 30, 2024

Submitted for August 1, 2024

Figure 1 Photo of RIDOT CCTV push camera, new state of the art technology for inspecting small diameter pipes



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**Rhode Island
National Pollutant Discharge Elimination System
Municipal Separate Storm Sewer Systems**

**2024 IDDE Compliance Update Report No. 10
January 1, 2024 – June 30, 2024
Submitted for August 1, 2024**

INTRODUCTION

The Rhode Island Department of Transportation (RIDOT) hereby submits this Illicit Discharge Detection and Elimination (IDDE) Compliance Update Report as required by the United States of America vs Rhode Island Department of Transportation Civil Action (No. CV-15-433) Consent Decree. The Consent Decree became effective on December 22, 2015, and details remedial measures in relation to the Rhode Island Pollutant Discharge Elimination System (RIPDES) Storm Water Discharge from Small Municipal Separate Storm Sewer Systems (MS4) and from Industrial Activity at Eligible Facilities Operated by Regulated Small MS4s permit.

This report focuses on IDDE-related work performed by RIDOT between **January 1, 2024, and June 30, 2024**, and is meant to provide a six-month update on IDDE work performed by RIDOT since the Annual Compliance Report submitted in March which summarized RIDOT's compliance work from July 1st to December 31st 2023.

RIDOT has continued to implement the IDDE program. Major steps taken this reporting period include:

- One new staff Environmental Scientist was hired for the IDDE program

- RIDOT has created DOT.IDDE@dot.ri.gov email account for RIDEM and municipalities to report Sanitary Sewer Overflows that may have impacted the RIDOT closed drainage system and associated outfalls.
- RIDOT has purchased a new push camera for inspecting small diameter pipes, this system is an upgrade with longer inspection capabilities and report generating software.
- RIDOT is finalizing the report and follow-up investigations of CCTV work performed in the Island Park SCP area.
- Conducted CCTV investigation of several locations including:
 - 25 CCTV Inspections
 - 97 Pipes
 - 7,009 Linear Ft of pipe inspected.
 - Drainage system is being cleaned in concurrence with inspections to ensure thorough coverage of the system.
- MPA 546 Project – Interstate 95 Drainage System Cleaning and CCTV (drainage system near Thurbers Ave) area of Providence is underway to thoroughly clean and further investigate causes of flooding and to assess connection points to the CSO.
- RIDOT worked with consultants to identify and plan sampling for outfalls that were outstanding from completed SCP areas and required wet and dry weather sampling.
- Conducted IDDE training for RIDOT SCP consultants with new field staff.

COMPLIANCE REPORTING

The Consent Decree establishes the prescribed reporting requirements expected of RIDOT on IDDE work. This report details RIDOT's accomplishments on IDDE during the reporting period as required in Consent Decree Paragraph 61. Each of the prescribed reporting requirements are outlined below:

ILLICIT DISCHARGE REMEDIAL MEASURES

§ 60.k. Wet and Dry Weather Screening of Discharge Points 60.k. Wet and Dry Weather Screening of Discharge Points

01/01/2024-06/30/2024 Activities: RIDOT Maintenance completes screening as part of their drainage cleaning/inspections. Maintenance screenings are documented in VUEWorks. IDDE Screening is also being done as part of SCP & IDDE Consultant work and is documented in the ArcGIS IDDE geodatabase. The attached excel workbook lists actions between 01/01/2024-06/30/2024.

01/01/2024-06/30/2024 Activities: ATTACHMENT: 60klmnp_IDDE_Jan-Jun2024.xls tabs k – Outfalls, k - Structures, k – IDDE Outfalls, and k - IDDE Structures provides raw data from the

VueWorks MMS and RIDOT’s ArcGIS online database. This data is a list of inspections and includes watershed.

Structure	Dry	Wet	Weather Unknown		Total
			Vueworks	GIS	
Outfall	132	102	0	1	235
Catch Basin/ Manhole	13	11	4928	1	4953
	145	113	4928	2	5188

* VUEWorks numbers includes duplicate inspection information (i.e. If maintenance completed an inspection, and then the consultant completed an inspection, both inspections would be counted for one structure)

Total outfall screenings conducted: 235

Total Catch Basin/ Manhole screenings conducted: 4,953

Total Screenings conducted: 5,188

§ 60.l. Status of “Other RIDOT Roadways” where SCPs are not required

During the reporting period, RIDOT has not identified any “Other RIDOT Roadways” in areas where SCPs are not required during the reporting period.

§ 60.m. Results of RIDOT IDDE and Discharge Point Screening & Sampling

RIDOT inspected 235 outfalls and 25 additional structures. The attached excel workbook lists actions between 01/01/2024 and 06/30/2024.

01/01/2024-06/30/2024 Activities: ATTACHMENT: 60klmnp_IDDE_Jan-Jun2024 tab m – Outfalls, and m – Structures provides raw data from RIDOT’s ArcGIS online database. This data includes sampling results and watersheds.

§ 60.n. Description of IDDE Investigations

RIDOT currently has 12 open investigations. There are currently 63 investigations that may need to be initiated. Completed memos are posted to the ArcGIS data system as they are completed. A total

of 6 open investigations were closed during the reporting period. See attachment for current information.

01/01/2024-06/30/2024 Activities: ATTACHMENT: 60klmnp_IDDE_Jan-Jun2024 tab n – Areas, and n – Actions provides raw data from RIDOT’s ArcGIS online database.

IDDE Investigations Exempt

RIDOT will request IDDE Exemptions for outfalls in accordance with Consent Decree § VI.C.22. as part of SCP submissions separately.

§ 60.o. Appendix 9 Interconnections

Outfalls in SCP areas will continue to undergo IDDE investigation following SCP schedules.

§ 60.p. List of IDDE Investigations exceeding 180 Days

The 12 ongoing investigations detailed in **60 N Description of IDDE Investigations: IDDE Investigations Open** have been open for more than 180 days. Five (5) have had recent Investigation Actions and are expected to be closed in the coming months. Three (3) are awaiting sampling from SCP consultants. The remaining open investigations are being scheduled to be conducted this summer/fall with specialty equipment and consultants to inspect the drainage systems. RIDOT will continue to work to close the 12 investigations that have been open longer than 180 days. This is an improvement over the previous 6-month reporting period where there were 16 investigations in this category.

01/01/2024-06/30/2024 Activities: ATTACHMENT: 60klmnp_IDDE_Jan-Jun2024 tab p – Investigations 180 days provides raw data from RIDOT’s ArcGIS online database.

§ 60.q. IDDE Complaints

This section provides a description of all 1) citizen complaints of potential illicit discharges, 2) reports of potential illicit discharges from RIDEM, and 3) internal referrals for IDDE evaluations based on catch basin inspections or during other RIDOT construction or maintenance work.

Citizen Complaints

(none to report for this reporting period)

RIDEM Referrals

There was one RIDEM referral during the reporting period. An email was sent to DOT.IDDE@dot.ri.gov informing OSM that the Town of Middletown experienced a SSO on May 16, 2024, at our Coddington Highway Pump Station at 320 Coddington Highway. The event lasted 90 minutes 6:30 AM – 8:00 AM, reported SSO was 11,250 Gallons. There were five RIDOT catch basins that were affected by the SSO at the RIPTA Newport Division driveway entrance, two on the Westside, one in the middle and two on the Eastside.

This was a good example of IDDE communication improvements between RIDEM, RIDOT, and municipalities. OSM will further work with RIDEM on this communication stream and to acquire access to SSO reports submitted to RIDEM through the EPA web-based reporting tool called Net Sewer Overflow

Internal Referrals

There was one internal referral during the reporting period. The bridge inspection office notified OSM of a potential IDDE due to a pipe in the wingwall of the bridge with observed steaming discharge. OSM investigated the area and found nothing from the drainage system and noted the pipe was not flowing. After communication with RIDEM OCI, RIDOT continued to investigate and contacted adjacent property owner Ashaway Line & Twine who confirmed the water line utility crossing next to the bridge is for their fire suppression system between the two facilities. There is a steam line that runs along the water line to prevent it from freezing and the small pipe observed in the wingwall of the bridge is from the utility box adjacent to it where there are valves and a steam line trap where condensate drains. While researching this address OSM found their RIPDES Permit No. RI0021814 with a reference to the temperature analysis done: “A temperature analysis is presented in Attachment B. This analysis demonstrates that even at a discharge temperature of 212 degrees F, (the boiling point of water), the discharge will have minimal increase in the temperature of the river. Therefore, limits are not required.”

This was a good example of IDDE training within RIDOT working to inform inspectors throughout the department about IDDE.

§ 60.r. IDDE Verified

(none to report for this reporting period)

ATTACHMENTS

- A. 60klmnp_IDDE_Jan-Jun2024 - RIDOT internal VUEWorks and ArcOnline IDDE database export for IDDE reporting