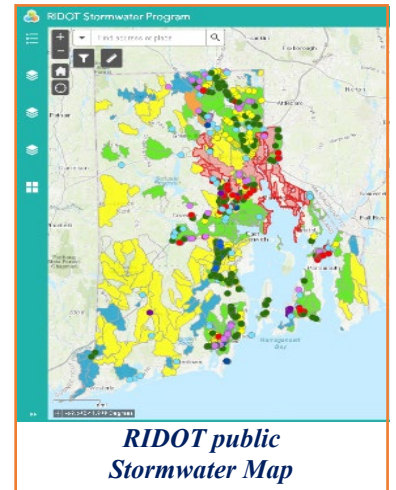


# RIDOT Municipal Separate Storm Sewer System – MS4

EPA Consent Decree  
Annual Compliance Report No. 11  
January 1 – December 31, 2024



*Route 4, East Greenwich RI*

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

**Annual Compliance Report No. 11  
January 1 – December 31, 2024**

## INTRODUCTION

The Rhode Island Department of Transportation (RIDOT) submits this Annual Compliance Report as required by the United States of America vs Rhode Island Department of Transportation Civil Action (No. CV-15-433) Consent Decree. This report focuses on the work performed by RIDOT between **January 1, 2024 and December 31, 2024**. The Consent Decree became effective on December 22, 2015, and details remedial measures in relation to the National Pollutant Discharge Elimination System (NPDES) Storm Water discharge from Small Municipal Separate Storm Sewer Systems and Industrial Activity at Eligible facilities Operated by Regulated Small MS4's permit.

The Consent Decree establishes Remedial Measures and schedules for three broad areas:

- 1.) TMDL and Impaired Waters, 2.) Illicit Discharge Detection and Elimination (IDDE), and
- 3.) Good Housekeeping. The Consent Decree also establishes the reporting requirements for the annual report, which will document the compliance efforts of the RIDOT each calendar year.

## COMPLIANCE REPORTING

The Consent Decree establishes the prescribed reporting requirements expected of RIDOT. This report will detail RIDOT's accomplishments during the reporting period, and where required, provide goals for the next reporting period. Each of the prescribed reporting requirements from the Consent Decree paragraph 60 are outlined below:

### § 60.A. IDENTIFICATION OF ALL PLANS, REPORTS AND OTHER SUBMISSIONS

See attachment for full Submission List. This list is all RIDOT Submissions from 2016-2024 that are pending EPA Approval, and all items submitted &/or approved in 2024.

#### ATTACHMENT 60a\_RIDOT\_Submission\_List\_2024.doc

SUBMISSION #	DATE	CD PARAGRAPH	ITEM	STATUS
57b	11/24/2020 + 3/12/2021		Blackstone River IDDE Exemption + Other RIDOT Roadways + Watershed Boundary Modification + Update	3/12/21 Pending
66b	8/27/2021 + 10/7/2022	§ VI.B.18.e. + § VI.C.22-23.	SCP Group 4091200 Pettaquamscutt River SCP - Other RIDOT Roadways + IDDE Exemption Request + Watershed Boundary Modification Memo	Approved 10/28/2021  10/7/22 PENDING
--	10/05/2021 + 3/1/2022		RIDOT IDDE Plan 2022 Update + changes to Paragraph 31	Pending formal approval Verbal approval to use 3/2/2022 + CD Modification filed with Court 2/4/2022
--	10/5/2021 + 3/1/2022		RIDOT IDDE QAPP 2022 Update	Pending formal approval Verbal approval to use 3/2/2022
--	3/2/2022	§ VI.C.24.c	RIDOT Long Term Monitoring Outfall Plan & Flowchart	Pending
71	8/17/2022		Water Quality Crediting Plan: Table 3 D.3 pervious land enhancement D.5 Proprietary Tech	Pending
74	3/10/2023	§ VI.A.15.b, § VI.A.16, § VI.B.18.f § VI.B.18.i § VIII.60	Request to change Reporting Requirements using RIDOT SCP Midpoint Reporting Approach	Pending
76a	6/5/2023	§ VI.B.18.e. + § VI.C.22-23.	SCP Group 4090100 Prov/Seekonk River SCP - Other RIDOT Roadways + IDDE Exemption Request + Watershed Boundary Modification Memo	pending
76b	6/5/2023	§ VI.B.18.e. + § VI.C.22-23.	SCP Group 4060800 Pocasset River SCP - Other RIDOT Roadways + IDDE Exemption Request + Watershed Boundary Modification Memo	pending

76c	6/5/23	§ VI.B.18.e. + § VI.C.22-23.	SCP Group 4070200 Barrington/Palmer River SCP - Other RIDOT Roadways + IDDE Exemption Request + Watershed Boundary Modification Memo	pending
78a	12/15/2023	§ VI.C.18.c.	SCP Group 4090100 Prov/Seekonk River SCP	Approved 9/20/2024
78b	12/15/2023	§ VI.C.18.c.	SCP Group 4060800 Pocasset River SCP	Approved 9/20/2024
78c	12/18/2023	§ VI.C.18.c.	SCP Group 4070200 Barrington/Palmer River SCP	Approved 9/20/2024
79	12/18/2023	§ VI.C.18.c.	SCP Group Upper Woonasquatucket River SCP update (Hawkins Brook; Reaper Brook)	Approved 9/20/2024
80	3/8/2024	§ VIII	RIDOT Consent Decree Annual Report #9 (2023)	No approval needed
81	3/13/2024	§ VI.B.18.b	RIDOT request to update Appendix 5 Groupings	Approved 9/20/2024
82	8/1/2024	§ VIII	RIDOT Semi-Annual IDDE Update Report #10	No approval needed
--	8/13/2024		RIDOT request to change IDDE dry- weather schedule	Approved 9/20/2024
83a	12/13/2024	§ VI.C.18.c.	SCP Lite Group 3020200A – Northern Watersheds, Tiverton Ponds, Block Island +IDDE Exemption Memo	Pending
83b	12/13/2024	§ VI.C.18.c.	SCP Lite Group 5010100A - Pawcatuck and Wood Rivers +IDDE Exemption Memo	Pending
83c	12/13/2024	§ VI.C.18.c.	SCP Group 5020500A Southwestern Watersheds +IDDE Exemption Memo	Pending
84	3/10/2025	§ VI.B.18.b	RIDOT request to update Appendix 5 with 2024 303(d) updates	new submission
85	3/10/2025	§ VIII	RIDOT Consent Decree Annual Report #11 (2024)	This submission (no approval needed)

## § 60.B. DESCRIPTION OF PROPOSED CHANGES

In 2024, RIDOT has requested the following Consent Decree updates:

- Request to change the schedule for IDDE screening & sampling pursuant to the Consent Decree in the case of U.S. vs Rhode Island Department of Transportation. RIDOT submitted 8/13/2024. **EPA approved 9/20/2024.**
- Request to revise Appendix 5 groupings of impaired water bodies in Consent Decree. RIDOT Submitted 3/13/2024. **EPA Approved 9/20/2024.**

## TMDL & IMPAIRED WATERS REMEDIAL MEASURES

These sections are now reported in the SCP MIDPOINT REPORTS

### § 60.C. ACTIONS TO ADDRESS IMPAIRED WATER BODY SEGMENTS

### § 60.D. SCP STRUCTURAL CONTROL STATUS

### § 60.E. STRUCTURAL CONTROL CONSTRUCTION REPORT

### § 60.F. REVISED O&M PLANS FOR CONSTRUCTED STRUCTURAL CONTROLS

### § 60.G. STATUS OF DESIGN/IMPLEMENTATION OF STORM WATER CONTROL PROJECTS IN CAPITAL PROGRAM (NOT SCP)

### § 60.H. UPDATED LIST OF APPROVED STORM WATER CONTROL PLANS

#### CY 2024 Activities:

SCP GROUP	SUBMITTED	STATUS
SCP Group 4090100 Prov/Seekonk River SCP	12/15/2023	Approved 09/20/2024
SCP Group 4060800 Pocasset River SCP	12/15/2023	Approved 09/20/2024
SCP Group 4070200 Barrington/Palmer River SCP	12/18/2023	Approved 09/20/2024
SCP Group 3020200A Northern Watersheds, Tiverton Ponds, and Block Island SCP	12/13/2024	Pending approval
SCP Group 5010100A Pawcatuck and Wood Rivers SCP	12/13/2024	Pending Approval
SCP Group 5020500A Southwestern Watersheds SCP	12/13/2024	Pending Approval

### § 60.I. O&M ACTIVITIES PERFORMED ON STRUCTURAL STORM WATER CONTROLS

**CY 2024 Activities:** RIDOT OSM continues to inventory and inspect STUs. RIDOT Maintenance and RIDOT Contractors continue to maintain STUs.

See attachment for data on STU inspections and maintenance activities.

**ATTACHMENT:** 60i\_STUInspections+Maintenance\_2024.xls

RIDOT OSM & Maintenance have developed a workflow for STU inspections, routine maintenance (grass mowing, drainage cleaning, etc) and non-routine maintenance (brush clearing, fencing repair, minor sediment removal, etc). Some maintenance is contracted out based on STU requirements and RIDOT Maintenance ability. STU inspections and maintenance is documented in VUEWorks.

### § 60.J. DISCHARGES TO NEWLY LISTED IMPAIRED WATER BODY SEGMENTS

**CY 2024 Activities:** RIDEM released a draft 303(d) impaired list on May 13, 2024. RIDEM held a public meeting and a public comment period. EPA approved the 303(d) list on August 28, 2024.

RIDOT has updated Consent Decree Appendix 5 and submits along-side this Annual Report as a new submission #84.

**ATTACHMENT:** 60j\_Appendix\_5\_2025\_Request

## ILLICIT DISCHARGE REMEDIAL MEASURES

***Illicit discharge remedial measures are reported twice a year. For the period of January 1st through June 30th an IDDE compliance update is completed and submitted to EPA in August. The period of July 1st through December 31st reported in this Consent Decree Annual Report.***

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

- Two members of the IDDE team earned 3 certifications from NASSCO (National Association of Sewer Service Companies Organization). These certifications provide a thorough and universally accepted format for documenting and inspecting catch basins, manholes, pipes, and outfalls within the RIDOT MS4:
  - PACP: Pipeline Assessment Certification Program
  - MACP: Manhole Assessment Certification Program
  - LACP: Lateral Assessment Certification Program
- Worked closely with RIDOT SCP consultants to finalize Investigation Needed Memos and Outfall Monitoring Closure reports
- RIDOT and RIDEM have continued working together to communicate about on-going investigations and enforcement actions to help eliminate illicit connections as they are reported and investigated.
- RIDOT has worked to restructure and streamline the VueWorks software which is used to document service requests between divisions to inspect and maintain drainage assets.
- RIDOT has eliminated 2 potential illicit discharges found from CCTV work and is finalizing the report for the Island Park SCP area.
- Conducted CCTV investigation of several locations including:
  - 49 CCTV Inspections
  - 162 Pipes
  - 14,534 Linear Ft of pipe inspected.
  - Drainage system is being cleaned in concurrence with inspections to ensure thorough coverage of the system.
- Conducted CCTV investigation of Allens Avenue area of Providence and I-95 on-ramp drainage network at request of RIDEM. Collected drainage condition data in relation to a history of petroleum spills and environmental hazards in the area.

## ATTACHMENTS

60klmnopqr\_IDDE\_Jul-Dec2024 - RIDOT internal VUEWorks and ArcOnline IDDE database export for IDDE reporting

## §60.K. WET AND DRY WEATHER SCREENING OF DISCHARGE POINTS

**7/1/2024-12/31/2024 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.

**7/1/2024-12/31/2024 Activities:** ATTACHMENT: IDDE\_Compliance\_Update\_Report\_Jul-Dec2024.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	3	90	2	3	98
Catch Basin/ Manhole	25	6	5,680	7	5,718
	<b>28</b>	<b>96</b>	<b>5,682</b>	<b>10</b>	<b>5,816</b>

\* 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)

## § 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 sampled 96 outfalls and 38 additional structures. The attached excel workbook lists actions between 07/01/2024 and 12/31/2024.

**7/1/2024-12/31/2024 Activities:** ATTACHMENT: 60klmnopqr\_IDDE\_Jul-Dec2024 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 4 open investigations, and 88 investigations that may need to be initiated. Completed memos are posted to the ArcGIS data system as they are completed. A total of 10 open investigations were closed during the reporting period. See attachment for current information.

**7/1/2024-12/31/2024 Activities:** ATTACHMENT: 60klmnopqr\_IDDE\_Jul-Dec2024: tab n – Areas, and n – Actions provides raw data from RIDOT’s ArcGIS online database.

## § 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

There are 3 ongoing investigations in 60 N that have been open for more than 180 days. Two (2) are awaiting sampling from SCP consultant. The remaining one (1) investigation is scheduled to be conducted this spring when the snow melts and weather conditions are suitable to run the vector truck and CCTV inspection equipment. RIDOT will continue to work to close the 3 investigations that have been open longer than 180 days. This is an improvement over the previous 6-month reporting period where there were 12 investigations in this category.

**7/1/2024-12/31/2024 Activities:** ATTACHMENT: 60klmnopqr\_IDDE\_Jul-Dec2024 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](mailto:DOT.IDDE@dot.ri.gov) informing OSM that the Town of Burrillville Wastewater Treatment Facility reported information concerning an SSO near Glendale Bypass and Rt. 102. Facility staff state the cause was a grease blockage and estimate between 10,000 and 20,000 gallons may have impacted the Branch River. Facility Staff, with the help of contractors, cleared the grease blockage and utilized septage haulers to prevent further discharge. OSM staff reported to the scene and verified the RIDOT drainage system was not impacted. This was a good example of the improved communication efforts between municipalities and local agencies.

### Internal Referrals

(none to report for this reporting period)

## § 60.R. IDDE VERIFIED

(none to report for this reporting period)

## GOOD HOUSEKEEPING REMEDIAL MEASURES

### § 60.S. STREET SWEEPING

RIDOT collected GPS tracking points in 2024 and used GIS Spatial Analyst to determine sweeping coverage. RIDOT Maintenance also tracks sweeping in VUEWorks via Work Orders. RIDOT swept 1,436 miles of roadway (approximately 97 percent) in 2023. Roadways that were not swept were under active construction or the MS4 completed sweeping.

ATTACHMENT: 60s\_StreetSweeping.xls

ATTACHMENT: 60s\_StreetSweeping\_Map.pdf

RIDOT Roadway Summary Data	Miles	Percent	
Total RI Roadways	6,895		
Total RIDOT Maintained Roadways	1,486	22%	% of Total RI Roadways
RIDOT Maintained Roadways in SCP Watersheds	916	62%	% of Total RIDOT Maintained Roadways
RIDOT Roadways Sweeping Summary Data			
Total Length of RIDOT Roadways Swept	1,428	96%	% of Total RIDOT Roadways
Total Length of RIDOT Roadways in SCP Watersheds Swept	888	97%	% of RIDOT Roadways in SCP Watersheds
RIDOT Roadways NOT Swept Summary Data			
Total Length of RIDOT Maintained Roadways NOT Swept	58	4%	% of Total RIDOT Roadways
Total Length of RIDOT Roadways in SCP Watersheds NOT Swept	30	3%	% of RIDOT Roadways in SCP Watersheds

\*Roads not swept were verified as active construction or Town completed.

\*Some roadways in East Providence were not swept due to bridge congestion.

### § 60.T. CATCH BASIN AND MANHOLE INSPECTIONS

**CY 2024 Activities:** RIDOT uses catch basins inspection numbers as a surrogate of total drainage system numbers for ease of tracking compliance as the total number of drainage assets was unknown. Inspections are completed by RIDOT Maintenance staff, RIDOT Stormwater staff, and some RIDOT Stormwater consultants.

ATTACHMENT: 60tuvwx\_Maintenance.xls

Catch Basins/Manholes	
VUEWORKS*	10,933

\* 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)

## § 60.U. OUTFALL INSPECTIONS

**CY 2024 Activities:** RIDOT Maintenance completed outfall inspections as part regular maintenance activities.  
**NOTE:** This section does not include Outfall inspections as part of IDDE for Stormwater Control Plans.  
 See § 60.k. & § 60.m. for those outfall inspection numbers.

**ATTACHMENT:** 60tuvwx\_Maintenance.xls

Outfalls	
VUEWORKS	7

## § 60.V. CATCH BASIN/MANHOLE CLEANING – REPORTING YEAR + 2 YEAR OUTLOOK

**CY 2024 Activities – Maintenance Division:** RIDOT Maintenance cleans catch basins and manholes as part regular maintenance activities in our District Garages and as part of the Statewide Drainage Crew.

**ATTACHMENT:** 60tuvwx\_Maintenance.xls

Catch Basins/Manholes	
VUEWORKS	6,283

**2 Year Outlook:** With the implementation of a dedicated Drainage Crew in RIDOT Division of Highway and Bridge Maintenance, RIDOT Maintenance continues to exceed the Consent Decree requirements for cleaning structures on non-interstate and interstate roadways. RIDOT continued efforts in VUEWorks and ArcGIS to provide better mapping and contracting analysis.

## § 60.W. CATCH BASIN/MANHOLE REPAIRS - REPORTING YEAR + 2 YEAR OUTLOOK

**CY 2024 Activities: Maintenance Division:** Maintenance documented the repair of 338 drainage structures in the VUEWorks system for 2024.

**ATTACHMENT:** 60tuvwx\_Maintenance.xls

Catch Basins/Manholes	
VUEWORKS	338

**CY 2024 Activities: Construction Division:** During the reporting period, 62 Bridge, Pavement, and Traffic projects were finalized. Drainage repairs were part of several construction projects. This information is not yet documented in VUEWorks.

**ATTACHMENT:** 60w\_FinalInspectionsConstruction.pdf

**CY2024 Activities: Office of Stormwater Management:** During the reporting period, 9 Drainage Repair Contracts were active as part of a Master Price Agreement for Drainage Structure Repairs. RIDOT spent ~\$1.2M on drainage repair contracts in 2024.

**ATTACHMENT:** 60tuvwx\_Maintenance.xls

**2 Year Outlook:** Maintenance will continue with individual structure repairs; OSM will continue to expand the Statewide Drainage Repair program.

## § 60.X. CLOSED DRAINAGE SYSTEM COMPONENT CLEANING AND REPAIRS

**CY 2024 Activities – Maintenance Division:** RIDOT Maintenance has started documenting cleaning of pipes and outfalls.

**ATTACHMENT:** 60tuvwx\_Maintenance.xls

**CY 2024 Activities: Construction Division:** During the reporting period, 62 Bridge, Pavement, and Traffic projects were finalized. Applicable projects included items to clean & flush catch basins, manholes, pipes and outfalls. This information is not yet documented in VUEWorks.

**CY2024 Activities: Office of Stormwater Management - Projects:** During the reporting period, 9 Drainage Repair Contracts were active as part of a Master Price Agreement for Drainage Structure Repairs. RIDOT spent ~\$1.2M on drainage repair contracts in 2024.

**ATTACHMENT:** 60x\_OSM\_DrainageRepairProjects tab x – OSM Drainage Projects

**2 Year Outlook:** The Office of Stormwater Management will continue issuing contracts for catch basin/drainage system repair to meet the Consent Decree requirements.

**CY2024 Activities: Office of Stormwater Management - CCTV:** During the reporting period, 74 locations - consisting of 524 structures and 21,839 linear feet of pipe - were CCTV'd for IDDE investigations, Maintenance needs, Construction or Project Management. RIDOT Stormwater continued utilizing WinCan software to document and track CCTV work.

**ATTACHMENT:** 60tuvwx\_Maintenance.xls tab x\_CCTVInspectionsReport

## MISCELLANEOUS CONSENT DECREE

### § 60.Y. SUPPLEMENTAL ENVIRONMENTAL PROJECTS UPDATE

RIDOT completed the two land transfers in accordance with Consent Decree § VII. Supplemental Environmental Projects and Appendix 12.

**EPA approved the SEPs on October 4, 2016 with no conditions.**

**There are no further actions or reporting requirements for this section.**

### § 60.Z. IDENTIFICATION OF ALL CONSENT DECREE NONCOMPLIANCE

**CY 2024 Activities:** RIDOT did not complete all of the IDDE investigations according to Consent Decree scheduling requirements. RIDOT continues to actively work to close investigations that have been open longer than 180 days. They have made progress in this category of investigations and have closed several during the reporting period. It is expected that several more will be closed in the coming reporting period.