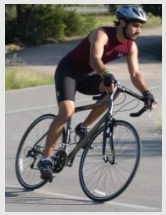
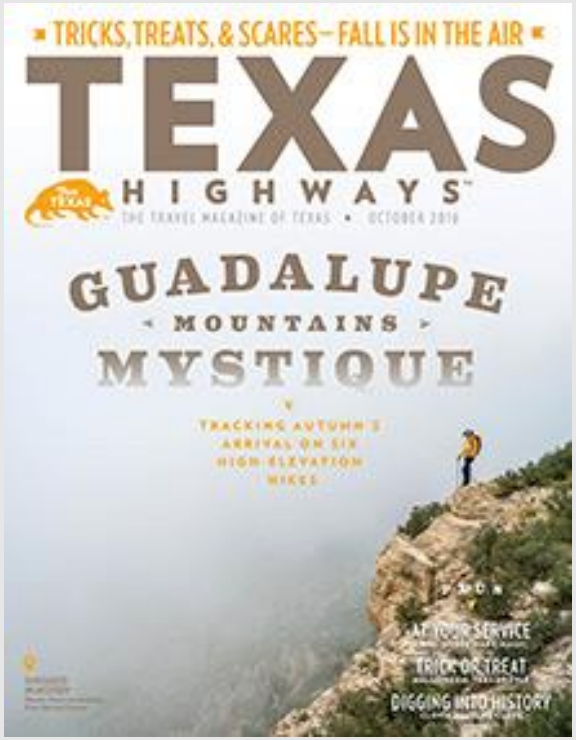


TXDOT
MS4 PROGRAM

Adrienne Boer, CFM, CPESC, PMP
Program Manager
Operations Compliance
TxDOT Environmental Affairs

Texas Pride

- Google “definition Texas Pride”
- Magazine of the Year Award: Texas Highways Magazine (International Regional Magazine Association)
- Don’t Mess With Texas



TxDOT MS4 Pride

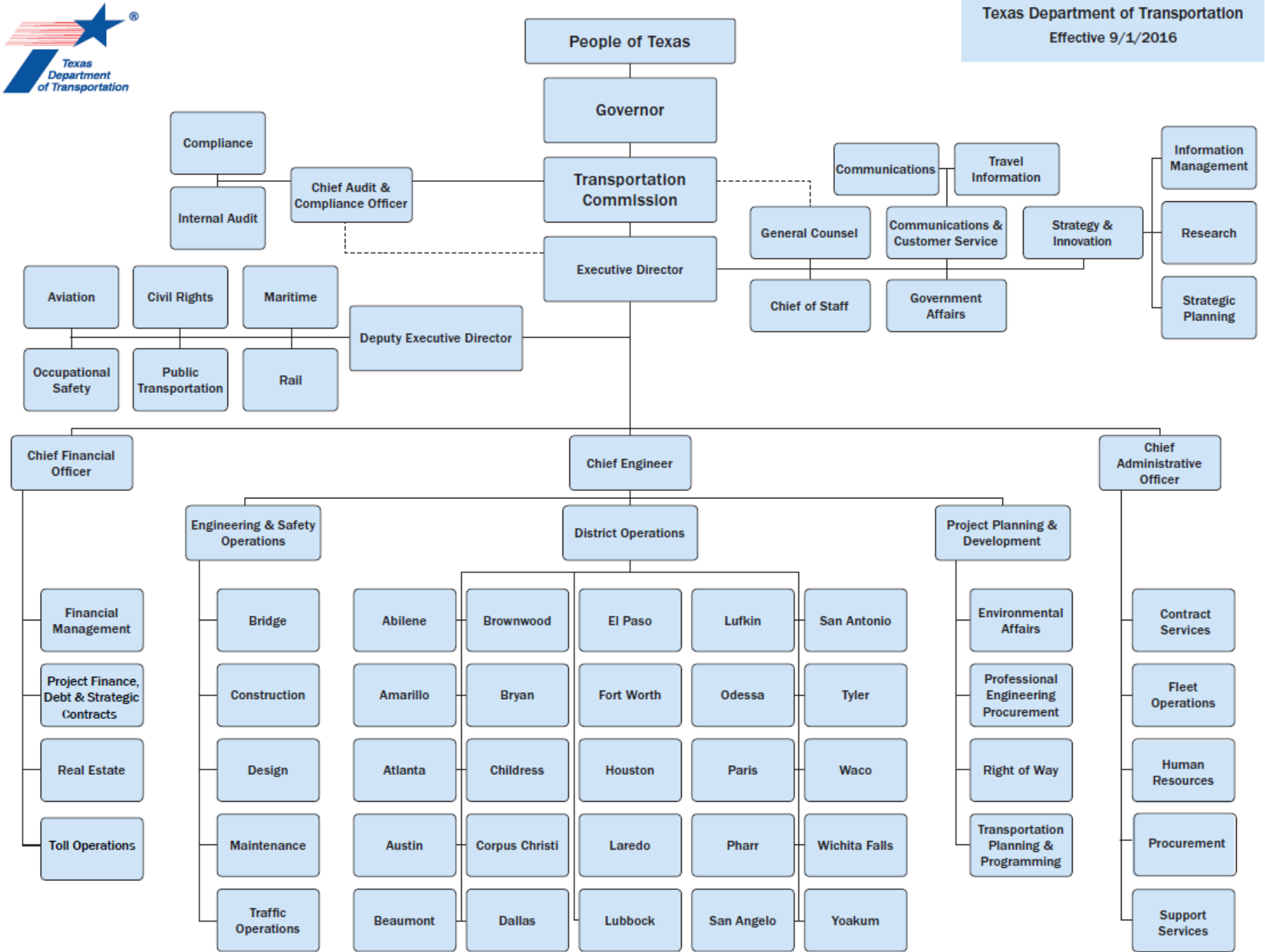
- 23 TxDOT MS4 program inspections from TCEQ
  - no violations
  - ranked “high” and scored 0, the highest ranking for a TCEQ inspection

Perks of the Job

Perks of the Job

Perks of the Job

Texas Department of Transportation
Effective 9/1/2016



Simplified Org Chart

- Districts
  - 25
  - 23 have MS4 permit requirements
- Divisions
  - Environmental Affairs
    - Operations Compliance

Operations Compliance Branch

- What we do:
  - District support
  - Environmental compliance support
  - Guidance/Training
  - NOV support
- Program areas:
  - CGP, MS4, PST, SPCC
  - Facility Compliance
  - Work Authorizations for stormwater, SPCC, facility compliance

Current Permits and Program

- Currently implementing 34 permits (Phase I and Phase II):
  - Phase I permits
    - Expired
    - Unexpired
  - Phase II permits
    - Expired
    - New Phase II areas (new urbanized areas, 2010 census)
      - San Marcos
      - Urbanized areas increased in size
- All expired permits administratively continued until statewide permit issued
  - Annual reports continue
  - Wet weather monitoring continues
  - All on-going programs continue

Purpose of Statewide Permit

- Streamline 34 permits into 1 statewide permit
- Simplify reporting
- Standardized statewide SWMP specific to TxDOT operations
- Develop fiscally responsible program
- Focus on areas in which TxDOT has authority and influence

Status of Statewide Permit WQ0005011000

- TCEQ received public comment
- TCEQ published Final Decision Letter and Response to Comments (RTC)
  - One change to permit based on comments (clarification)
- TCEQ received Hearing Request
- TCEQ currently reviewing Hearing Request

How is Statewide Permit different?

- Modeled after Phase II Permit
- Includes previous requirements from Phase I permits
  - Anti-backsliding
- Includes regulated area from previous permits plus new Phase II areas from 2010 census
- Focus on programmatic enhancements for IDDE
- Facility inspections
- Mapping permanent controls
- Enhanced TMDL requirements
- Enhanced training requirements

Statewide Permit Implementation

- Focus on IDDE
  - Stormwater pollutants often originate outside ROW
  - No enforcement authority to implement ordinances, assess fines
- IDDE in lieu of Wet Weather Monitoring
- Collect water quality samples from IDDEs

Statewide Permit Tools Development

- Annual Report Template
  - One statewide report for statewide permit
  - Completed at district level for district's activities
  - .xls spreadsheet format
- Training protocol for Statewide permit
  - IDDE training
  - Facility Inspections
  - Annual Report

EPA "Self Review" Observations

- Focusing on Enforcement
  - MS4 must enforce throughout entire MS4 area
    - Both TxDOT and non-TxDOT projects
    - Must follow through with construction inspections and escalate as needed
- Record-keeping
  - Must keep records 3 years after permit termination
  - Update SWPPPs, document follow-up with inspections
- Must follow our own procedures
  - That is our enforcement of the MS4 program
  - We function on EPA's behalf

Recent EPA “Self Review”

- EPA conducted audit of MS4 permit in several districts
  - Included Construction General Permit compliance
- Audit findings:
  - Form 2118 priority applied differently by each inspector
  - Inspectors not inspecting BMPs to TxDOT spec
  - Contractors not installing to spec
  - SWPPP site map and inspection forms incomplete

The Importance of Quality

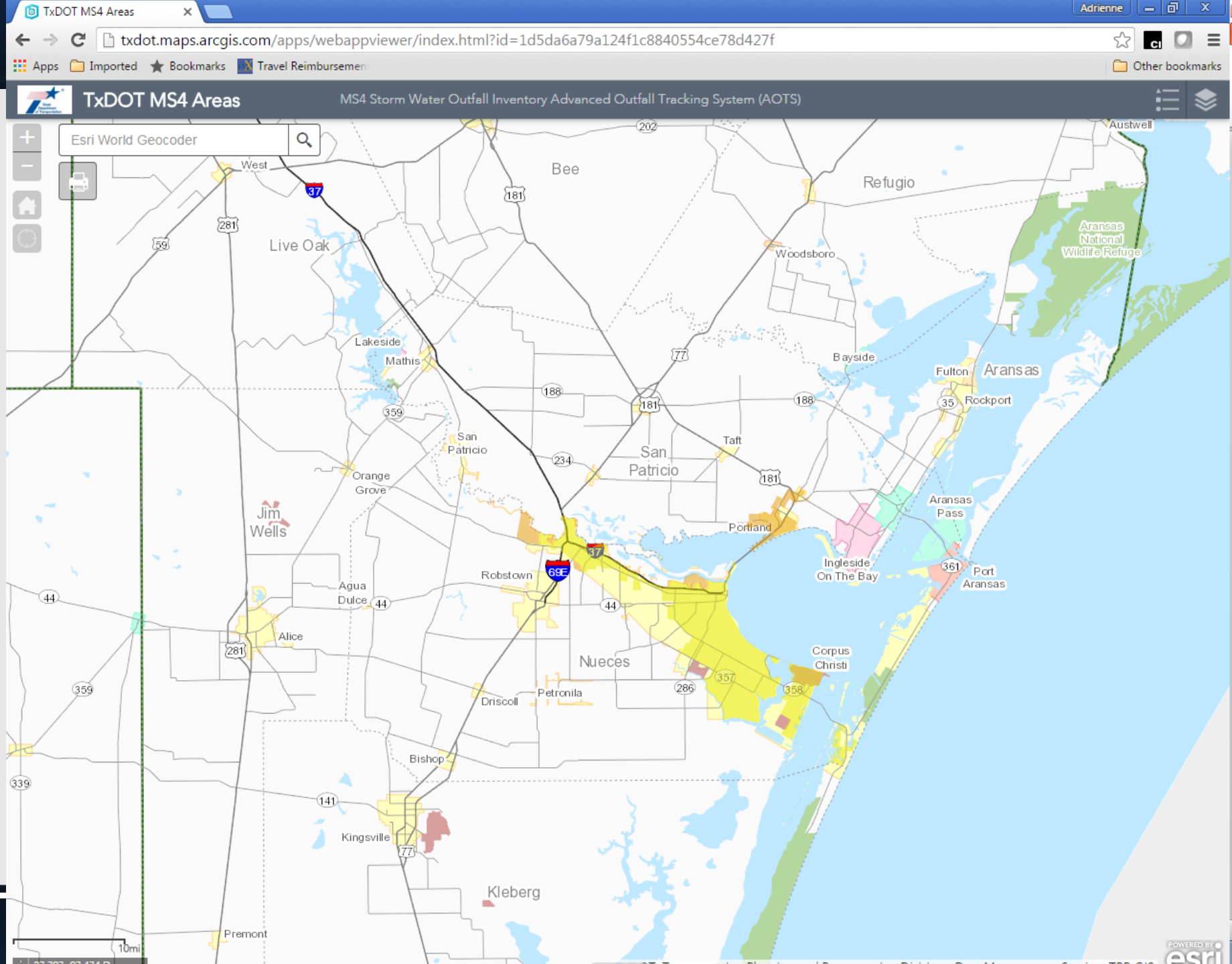
*Not a TxDOT project

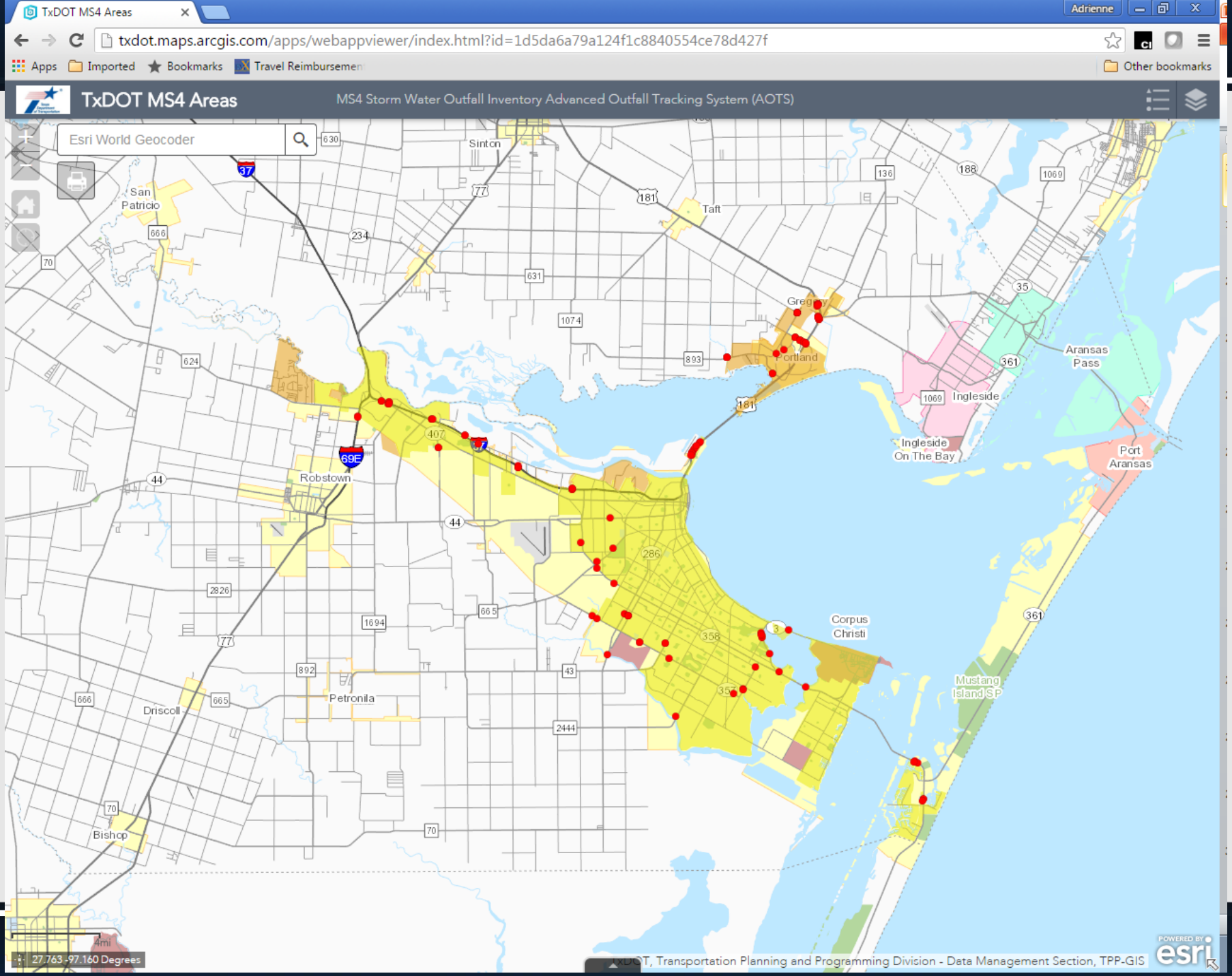
TxDOT Forms

- Construction SWP3 Field Inspection and Maintenance Form (2118)
- Stage Gate Checklists:
  - Construction (2448)
  - PS&E (2443)
  - AP&D (2442)
- Facility Survey Checklist

DEQC Program

- Auditing eyes on the program
- Performs field and office record reviews on construction and maintenance projects
- Addresses stormwater compliance and other environmental regulations
- Increases uniformity in required documentation used to demonstrate compliance with environmental regulations
- Report findings to the area or project engineer and copy the district director of construction.


TxDOT MS4 Areas
txdot.maps.arcgis.com/apps/webappviewer/index.html?id=1d5da6a79a124f1c8840554ce78d427f
TxDOT MS4 Areas
MS4 Storm Water Outfall Inventory Advanced Outfall Tracking System (AOTS)
Esri World Geocoder
West
Live Oak
Bee
Refugio
Woodsboro
Aransas National Wildlife Refuge
Austwell
Lakeside
Mathis
Bayside
Fulton
Aransas
Rockport
San Patricio
Taft
San Patricio
Orange Grove
Jim Wells
Portland
Aransas Pass
Ingleside On The Bay
Port Aransas
Robstown
Agua Dulce
Alice
Nueces
Corpus Christi
Driscoll
Petronila
Bishop
Kingsville
Kleberg
Premont
10mi
Adrienne


TxDOT MS4 Areas
txdot.maps.arcgis.com/apps/webappviewer/index.html?id=1d5da6a79a124f1c8840554ce78d427f
TxDOT MS4 Areas
MS4 Storm Water Outfall Inventory Advanced Outfall Tracking System (AOTS)
Esri World Geocoder
Sinton
San Patricio
Taft
Gregory
Portland
Aransas Pass
Ingleside
Ingleside On The Bay
Port Aransas
Robstown
Corpus Christi
Mustang Island SP
Petronila
Driscoll
Bishop
27.763 -97.160 Degrees
TxDOT, Transportation Planning and Programming Division - Data Management Section, TPP-GIS

MS4 NOI

- If your project drains to the TxDOT ROW, we need to be notified
- Search “TxDOT NOI”
  - Shows MS4 map per District, and contact info for sending NOI
  - http://www.txdot.gov/inside-txdot/division/environmental/ms4-noi.html

Divisions

- Aviation
- Bridge
- Civil Rights
- Communications
- Compliance
- Construction
- Contract Services
- Design
- Environmental Affairs
- Financial Management
- Fleet Operations
- General Counsel
- Government Affairs
- Human Resources
- Information Management
- Internal Audit
- Maintenance
- Maritime
- Occupational Safety
- Procurement
- Professional Engineering Procurement Services
- Project Finance, Debt and Strategic Contracts

MS4 Notice of Intent (NOI)

Home > Inside TxDOT > Divisions > Environmental Affairs

If you plan to discharge construction storm water into TxDOT's MS4 system, you must provide a copy of the signed NOI to the district. To determine the NOI contact for the district, contact the general information office using the information below.

NOI Contacts

MS4 Map	District Contacts
Abilene	Abilene
Amarillo	Amarillo
Atlanta	Atlanta
Austin	Austin
Beaumont	Beaumont
Brownwood	Brownwood
Bryan	Bryan
Childress	Childress
Corpus Christi	Corpus Christi
Dallas	Dallas
El Paso	El Paso

Home

Resource Type

Memos and Policy
Forms and Templates
Training
Manuals, Guides, and SOPs
Specifications, Standards, and APLs
TCEQ Resources
EPA Resources
Agreements
Research
Anti-Pollution Campaigns and Publications
Useful Websites

Subject (MCM)

Public Education (MCM 1)
Storm Sewer Pollution Prevention (MCM 2)
Construction (MCM 3)
Post-Construction (MCM 4)
Operations and Maintenance (MCM 5)
Impaired Waters
Edwards Aquifer
General Stormwater Resources

If you have difficulty using this site, try switching browsers.

TxDOT's stormwater program relies on hundreds of resources that are housed by multiple divisions and organizational units within TxDOT, as well as other agencies. This site is intended to provide a single Hub or "one-stop-shop" of existing MS4 and CGP resources.

To find something on this site:

- Browse by **Resource Type** or **Subject (MCM)** to the left or from the drop down menus in the grey banner above;
- Use the **search feature** in the top right corner of this page; or,
- Download and review the Hub Index, which indexes everything on this site by the page it is posted on.

You can leave feedback about this site on the Hub Discussion Board, or contact Amy.Foster@TxDOT.gov.

For a list of updates to this site, and instruction for how to get an alert when something on this site changes, skip to the Updates page.

For CGP and SWP3 resources, skip to the Construction Stormwater page.

For maintenance or facilities management resources, skip to the Operations and Maintenance page.

MCM 1

Public Education, Outreach, and Involvement

The MS4 permit requires TxDOT to develop, implement, and maintain a comprehensive stormwater education and outreach program to educate employees, contractors, and the traveling public of hazards associated with illegal discharges, improper disposal of waste, floatables, toxic materials, used oil, disposal and management of pesticides, herbicides and fertilizers and about the impact that stormwater discharges can have on local waterways, as well as the steps that the traveling public can take to reduce pollutants in stormwater.

Don't Mess with Texas

Don't Mess With Texas Water (to report illigal dumping)

All TxDOT stormwater training is relevent to MCM 1. See the Training Page for all classes.

Stormwater Hub

Memos and Policy

Page Contents

MS4 Memos

Memo(s) pertaining to the MS4 program in general.

CGP Authorization Memos

Memos that pertain to determining if CGP authorization is required, who is responsible for obtaining CGP authorization, and how to obtain CGP authorization in various circumstances.

BMP Memos

Memos pertaining to erosion control, sediment control, and good housekeeping on construction and/or maintenance projects.

Compliance Memos

Memos pertaining to DEQC inspections, contractor issues, and how to deal with NOVs.

EMS Memos

EMS memos that are relevant to the MS4 and CGP program.

Maintenance Facilities Memos

Memos pertaining to hazardous materials and good housekeeping at maintenance facilities.

Non-TxDOT Memos

EPA and TCEQ memos that are relevant to the MS4 and CGP programs.

These memo(s) pertain to the MS4 program in general

MS4 Memos

Municipal Separate Storm Sewer System (MS4) Inter-Local/Jurisdictional Agreement with Local Government, 2012.

BMP Memos

Memos pertaining to erosion control, sediment control, and good housekeeping on construction and/or maintenance projects.

Memos pertaining to hazardous materials and good housekeeping at maintenance facilities.

Non-TxDOT Memos

EPA and TCEQ memos that are relevant to the MS4 and CGP programs.

These memo(s) pertain to the MS4 program in general

MS4 Memos

Municipal Separate Storm Sewer System (MS4) Inter-Local/Jurisdictional Agreement with Local Government, 2012.
Sets standard to establish inter-local agreements with MS4 co-permittees, and provides an inter-local agreement template. See Standard Contracts on the Contract Services Crossroads site for the most recent version of this agreement template (look under "Inter-local").

These memos pertain to determining if CGP authorization is required, who is responsible for obtaining CGP authorization, and how to obtain CGP authorization in various circumstances

CGP Authorization Memos

TxDOT and Contractor Co-Permittees SP 506-003 and SP 007-004, 2016.
Describes the co-permittee relationship between TxDOT and the contractor under SPs 506-003 and 007-004.

Storm Water Compliance - Requirements for Construction Projects Let By Local Governments, 2013.
Discusses who has primary and secondary operator responsibilities (e.g., who files the NOI) under the CGP on local government-let projects. Also excludes such projects from the EMS.

Construction General Permit Compliance for Fireguards, 2009.
Discusses when CGP authorization is required for fireguards (i.e., firebreaks) bladed along the right-of-way during emergency situations, and how to obtain it.

Stormwater Hub - Memos
https://txdot.sharepoint.com/sites/division-ENV/stormwater/hub/SitePages/Memos%20and%20Policy.aspx
Office 365 | Sites
BROWSE PAGE
SHARE FOLLOW EDIT

Authorization to Discharge Storm Water from Construction and Maintenance Sites and attached sketch, 2003.
Describes responsibility for CGP compliance on PSLs (i.e., who files the NOI), and how PSLs affect the total disturbed acreage of the project.

Construction General Permit Authorization to Discharge Storm Water from Maintenance Work, 2003.
Clarifies the types of maintenance activities that do and do not require authorization under the CGP.

These memos pertain to erosion control, sediment control, and good housekeeping during construction and/or maintenance activities

BMP Memos

Project Vegetation Establishment, 2011 and Project Vegetation Establishment, 2013.
Discusses how to comply with CGP final stabilization requirements during drought conditions.

Best Management Practices (BMPs) Options for TxDOT Storm Water System Maintenance Operations, 2005.
Discusses BMPs related to the handling and disposition of storm water associated with sediment removal operations (e.g., removal using a vactor truck).

Deposit of Debris on Private Property, 2003.
Prohibits utilization of private property as spoil sites, and establishes a process and a template agreement to allow disposal of soil and other inert material on adjacent property under certain circumstances.

Preservation of Native Growth on Highways, 1963.
Directs that consideration be given to the preservation of native growth along highways during construction and reconstruction work.

These memos pertain to DEQC inspections, contractor issues, and how to deal with NOVs

Compliance Memos

Reporting Environmental Citations and Potential Noncompliance Violations (NOV), 2012 and Reporting Environmental Citations and Potential Noncompliance Violations (NOV), 2015.
Describes the process to respond to an NOV, and the process to report an NOV internally using ENV_Citation@TxDOT.gov.

Project Environmental Requirements and District Environmental Quality Coordinator

Stormwater Hub

Manuals, Guides, and SOPs

Page Contents

Manuals
Guides
SOPs
Non-TxDOT Guidance (TCEQ, EPA, FHWA, etc.)

Manuals

Environmental Management System Manual

PS&E Preparation Manual. See Chapter 2, Section 3, Plan Set Preparation (Storm Water Pollution Prevention Plans).

Project Development Process Manual. See Chapter 3, Environmental and Chapter 5, Section 7, 5600: Design Storm Water Pollution Prevention Plan.

Hydraulic Design Manual. See Chapter 13, Storm Water Management.

Maintenance Management Manual. See Chapter 5, Section 6, Storm Water Management.

Herbicide Operations Manual

Maintenance Operations Manual. See Chapter 2, Roadway (litter, vegetation management, storm water management, abandoned hazardous materials, emergency spill response, etc.).

Roadside Vegetation Management Manual

Snow and Ice Control Operations Manual

Landscape and Aesthetics Design Manual. See Chapter 4, Section 4, Topography and Grading.

Stormwater Hub

Useful Websites

Public Storm Water Program external website

Stormwater SharePoint page

AOTS Outfall Map Crossroads site. See also AOTS Outfall Map (2012).

Environmental Management System (EMS) websites:

- EMS external website
- EMS Crossroads site
- EMS General SharePoint site

Petroleum Storage Tank Compliance SharePoint page

Hazardous Materials Toolkit

Hazardous Materials Management Branch Crossroads site

Hydrology and Hydraulics Crossroads site

Maintenance Field Support Section Crossroads site (revegetation, pesticides, herbicides, de-icing, etc.)

TxDOT Publications for Kids

Questions?

Adrienne Boer

(512) 416-2605

adrienne.boer@txdot.gov