MONTANA
Department of Transportation

Malcolm "Mack" Long, Director

2701 Prospect ▪ PO Box 201001
Helena MT 59620-1001

February 27, 2024

Tatiana Davila, Chief
Water Protection Bureau
Department of Environmental Quality
PO Box 200901
Helena, MT 59620-0901

Subject: 2023 Small MS4 Annual Report: Individual Permit Number MT0031844

Dear Ms. Davila:

Currently, the Montana Department of Transportation (MDT) holds the following small MS4 permits that are administratively extended under the 2010 MS4 General Permit: MTR040001 – Billings, MTR040002 – Bozeman, MTR040004 – Great Falls, MTR040005 – Kalispell, MTR040006 – Butte, MTR040007 – Missoula, MTR040009 – Helena, and MTR040010 – Yellowstone County.

In previous permit cycles, MDT held co-permittee status for each of the above permits except for MT040009 – Helena, which was sole permittee. During the 2015 renewal process, MDT made the decision to apply for an individual Montana Pollutant Discharge Elimination System (MPDES) permit. The application for this individual permit was submitted to your agency on November 24, 2014. A Notice of Completeness for MDT's application was received on December 19, 2014, providing the Individual MPDES Permit number MT0031844. The letter also provided notice under the Administrative Rules of Montana 17.30.1313 that our current permit authorizations would be administratively extended until such time your agency issues an individual permit.

Subsequent email correspondence with your agency in January 2016 indicated MDT had the option to submit one annual report under the individual permit MT0031844 to cover the currently administratively extended permit authorizations. For clarity and efficiency, MDT is submitting a single annual report. MDT's Storm Water Management Plan (SWMP) is applied uniformly statewide in all of Montana's small MS4s. By submitting one annual report for MDT's Individual Permit MT0031844, repetition of information will be eliminated. Any information specific to one permit will reference only that specific permit (i.e. MTR04--) or the MS4 Area.

Environmental Services Bureau
Phone: (406) 444–7228
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MDT has extensive staff and a budget specifically devoted to environmental compliance and performance. Additionally, MDT staff are expected to participate in environmental compliance and stewardship activities in their work efforts. In 2023, MDT continued ongoing improvements in support of the MS4 program. Of note, MDT would like to highlight the following major achievements accomplished this past year:

- Issued an updated SWMP in 2023 and solicited additional public feedback;
- Posted 12 Facebook Posts
- Posted an article in the September issue of Newsline.
- Updated the yearly tracking calendar to facilitate MS4 management and oversight.
- Compiled a list of potential significant non-storm water discharges and added it to the MDT SWMP in May 2023
- Developed an MS4 Storm Water Monitoring Plan October 2023 in anticipation of future permit requirements.
- Updated SWMP Feedback form August 2023
- A construction stormwater management plan review checklist was developed and completed 12/21/2023.
- A new LID form, drafted in 2022 was implemented and updated in May2023.
- A Categorical Exclusion document was updated April 2023.
- FPPP monthly inspection checklist was updated January 2023
- Annual FPPP inspection summary was updated May 2023
- FPPP update and training procedures guidance document was updated June 2023
- Developed a Good Housekeeping/Pollution Prevention poster December 2023, for use at MDT facilities showing the various pollutants associated with MDT facilities and best practices to manage them.
- Created and distributed an MDT IDDE Field Guide
- Developed an online reporting tool specific to IDDE and storm water construction complaints.
- Updated Environmental Construction Inspection form April 2023.
- Updated BMP Inspection Report form April 2023.
- Updated the Facilities Inventory.
- Inspected 100% of facilities each month.
- Completed mapping data collection efforts for other storm water conveyances.
- Refined and updated MS4 maps which will include high priority designations and other pertinent mapping layers.
- Compiled and implemented an erosion control subcontractor stakeholder's group, meetings to be held annually starting in 2024.
- Updated MDT's website and included the ability to report complaints, pollution observed at MDT Construction Sites and Illegal Dumping/Illicit Discharges.
- Developed a Draft Process for offsite treatment on MDT projects to be implemented in 2024.
- Completed an annual update to MDT's Illicit Discharge Detection and Elimination (IDDE) Investigation and Corrective Action Plan (CAP).
- Identified high priority areas and outfalls in accordance with IDDE CAP.
- Completed mapping data collection efforts for other storm water conveyances.
- Updated Facility Pollution Prevention Plans (FPPP).

- Developed a list of potential non-storm water discharges identified as significant contributors of pollutants (i.e., illicit discharges).
- Completed mapping Facility Data that was collected for each MS4 facility.
- Reviewed and updated MDT Storm water Responsibility Table.
- Continued work with MDT Maintenance for implementation of additional Best Management Practices (BMP) at MDT facilities located in MS4s.
- Prioritized funding with MDT Maintenance for implementation of additional Best Management Practices (BMP) at MDT facilities located in MS4s.

Additionally, MDT is continuing to evaluate potential MS4 program improvements. For 2024, several initiatives have been identified as follows:

- MDT's MS4 intranet page will continue to be updated to include additional storm water resources, training presentations, and generate enthusiasm for water quality through more engaging content. Create engaging social media posts that direct users to visit the MDT website.
- Publish at least one article in Newsline in 2024.
- Post public notice in each MS4 soliciting feedback on the SWMP by June 30th
- Schedule and hold at least one erosion control Subcontractor stakeholder meeting.
- Review and publish storm sewer system mapping in 2024.
- Review statewide dry weather screening and update designated High Priority Outfalls list by fall of 2024.
- Update MDT's IDDE CAP and report date updated.
- MDT will review written policies and procedures identified in MDT's ERP and add updates if needed.
- Complete developing criteria for determining when offsite treatment will be allowed on MDT projects and conduct a formal review and approval process for these determinations.
- Continue coordination with Maintenance in completion of the post-construction checklist.
- Present MDT's outfall mapping process and seek approval of guidance from DEQ.
- Create and implement Survey 123 Dry Weather Screening Form
- Meet with MS4 Cities to discuss MDT's outfall mapping with municipalities.
- Track Illicit Discharge investigations and corrective action data.
- Track all projects awarded each year within each MS4 and verify required special provisions are included in contract documents.
- Every project awarded within each MS4 that requires a CGP SWPPP will be entered into the review checklist and findings will be in the 2024 Annual Review.
- DEES will complete monthly inspections of MDT projects within MS4 boundaries using forms as well as with tracking spreadsheets.

- Maintain an inventory of regulated projects that utilize off-site treatment for post-construction storm water runoff.
- Complete development of an inventory of post-construction storm water management controls.
- Complete Online IDDE training program by December 31, 2024.
- Distribute the MDT facilities Poster showing the various pollutants and management practices.
- MDT will continue to explore new opportunities to provide education and training to personnel.

Please find attached an original signature copy of the 2022 MPDES Small MS4 Annual Report Form (MS4-AR). Appendices are identified within the provided form and attached. The comprehensive annual report is signed and certified as a whole document.

If you have any questions or concerns, please contact Tom Gocksch at 406.444.9412 or Walt Ludlow at 406.444.9227. They will be pleased to assist you.

Tom S. Martin, P.E.
Environmental Services Bureau Chief

copies:	Rob Stapley	Rail, Transit, and Planning Division Administrator
	Bob Vosen, P.E.	Missoula District Administrator
	Gino Liva P.E.	Butte District Administrator
	Jim Wingerter, P.E.	Great Falls District Administrator
	Mike Taylor, P.E.	Billings District Administrator
	Justun Juelfs	Kalispell Maintenance Chief
	Steve Felix	Missoula Maintenance Chief
	Ted Jones	Bozeman Maintenance Chief
	Jim Pesanti	Butte Maintenance Chief
	Harry Barnett	Great Falls Maintenance Chief
	Walt Houghton	Billings Maintenance Chief
	John Schmidt, P.E.	Missoula District Construction Engineer
	Dave Cunningham, P.E.	Butte District Construction Engineer (Acting)
	Rich Hibl, P.E.	Great Falls District Construction Engineer
	Ted Thronson	Billings District Construction Engineer
	Michael Ivanoff, P.E.	Missoula District Environmental Engineering Specialist
	Rich Nehl, P.E.	Butte District Environmental Engineering Specialist
	Ben LaVoie, P.E.	Great Falls District Environmental Engineering Specialist
	Terry Callahan, P.E.	Billings District Environmental Engineering Specialist
	Andrew Fletcher	Glendive District Environmental Engineering Specialist
	JD Buck	Statewide Environmental Engineering Specialist
	Doug McBroom	Maintenance Operations Manager
	Mike Murolo	Maintenance Facilities Manager
	Jen Johnson, P.E.	Hydraulics Engineer
	Tom Martin, P.E.	Environmental Services Bureau Chief
	Tom Gocksch, P.E.	Environmental Services Engineering Section Supervisor
	Walter Ludlow, P.E.	Field Services Unit Supervisor
	John Heinley, P.E.	Project Development Engineer, Missoula District
	Dustin Rouse, P.E.	Highways and Engineering Division Administrator

Agency Use			
Permit No.:		Date Rec'd	Rec'd By

Montana Department of Environmental Quality

WATER PROTECTION BUREAU

FORM **MS4-AR**

MPDES Storm Water Small MS4 Annual Report Form

This form is to be completed by each permittee or co-permittee authorized to discharge storm water under the *General Permit for Storm Water Discharge Associated with Small Municipal Separate Storm Sewer System (MS4)*. All authorized permittees or co-permittees are required to complete this Annual Report Form for each calendar year the facility is authorized as required in Part IV.I. of the General Permit and to submit it (postmarked) no later than March 1st following the respective calendar year reporting period. For co-permittees authorized under one permit authorization and for co-permittees with multiple permit authorizations, you are required to complete this form and all items on it exclusively for your particular Small MS4 and Storm Water Management Program (SWMP) within your respective regulated Small MS4 area. The Department has attached instructions for this form in order to help with the completion of item responses. **If additional space is needed for item responses, you may include attachments noting the section and item number.**

Section A - Permit Authorization Number for Facility MTR04 0 0 0 1

MS4 Annual Report for Calendar Year 2023

What size population does your MS4 serve? 0 (No Resident Population)

Section B - Facility or Site Information *(See instructions.):*

Small MS4 Name MDT MS4- Billings

Zip Code 59101-59108;59111-59112;59114-5911 County Yellowstone

Latitude 45.787397 Longitude -108.499947

Small MS4 Type: Federal ☐ State ☑ County ☐ City/Town ☐ Other ☐

Section C - Applicant (Owner/Operator) Information

Contact Person: Name Tom Martin Title Bureau Chief-Environmental Services

Owner or Operator Montana Dept. of Transportation

Mailing Address PO Box 201011

City, State, and Zip Code Helena, MT 59620

Phone Number (406) 444-0879

Section D - Water Quality Priorities

1. Does your MS4 discharge to waters listed as impaired on the Montana 303(d) List? ☑ Yes ☐ No

Agency Use			
Permit No.:		Date Rec'd	Rec'd By

Montana Department of Environmental Quality

WATER PROTECTION BUREAU

FORM **MS4-AR**

MPDES Storm Water Small MS4 Annual Report Form

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Section A - Permit Authorization Number for Facility MTR04 0 0 0 2

MS4 Annual Report for Calendar Year 2023

What size population does your MS4 serve? 0 (No Resident Population)

Section B - Facility or Site Information *(See instructions.):*

Small MS4 Name MDT MS4- Bozeman

Zip Code 59715,59716,59719, and 59772 County Gallatin

Latitude 45.68873 Longitude -111.03194

Small MS4 Type: Federal ☐ State ☑ County ☐ City/Town ☐ Other ☐

Section C - Applicant (Owner/Operator) Information

Contact Person: Name Tom Martin Title Bureau Chief-Environmental Services

Owner or Operator Montana Dept. of Transportation

Mailing Address PO Box 201011

City, State, and Zip Code Helena, MT 59620

Phone Number (406) 444-0879

Section D - Water Quality Priorities

1. Does your MS4 discharge to waters listed as impaired on the Montana 303(d) List? ☑ Yes ☐ No

Agency Use			
Permit No.:		Date Rec'd	Rec'd By

Montana Department of Environmental Quality

WATER PROTECTION BUREAU

FORM **MS4-AR**

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Section A - Permit Authorization Number for Facility MTR04 0 0 0 4

MS4 Annual Report for Calendar Year 2023

What size population does your MS4 serve? 0 (No Resident Population)

Section B - Facility or Site Information *(See instructions.):*

Small MS4 Name MDT MS4- Great Falls

Zip Code 59401 through 59406 County Cascade

Latitude 47.52378 Longitude -111.30896

Small MS4 Type: Federal ☐ State ☑ County ☐ City/Town ☐ Other ☐

Section C - Applicant (Owner/Operator) Information

Contact Person: Name Tom Martin Title Bureau Chief-Environmental Services

Owner or Operator Montana Dept. of Transportation

Mailing Address PO Box 201011

City, State, and Zip Code Helena, MT 59620

Phone Number (406) 444-0879

Section D - Water Quality Priorities

1. Does your MS4 discharge to waters listed as impaired on the Montana 303(d) List? ☑ Yes ☐ No

Agency Use			
Permit No.:		Date Rec'd	Rec'd By

Montana Department of Environmental Quality

WATER PROTECTION BUREAU

FORM **MS4-AR**

MPDES Storm Water Small MS4 Annual Report Form

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Section A - Permit Authorization Number for Facility MTR04 0 0 0 5

MS4 Annual Report for Calendar Year 2023

What size population does your MS4 serve? 0 (No Resident Population)

Section B - Facility or Site Information *(See instructions.):*

Small MS4 Name MDT MS4- Kalispell

Zip Code 59701 County Flathead

Latitude 48.1978 Longitude -114.3161

Small MS4 Type: Federal ☐ State ☑ County ☐ City/Town ☐ Other ☐

Section C - Applicant (Owner/Operator) Information

Contact Person: Name Tom Martin Title Bureau Chief-Environmental Services

Owner or Operator Montana Dept. of Transportation

Mailing Address PO Box 201011

City, State, and Zip Code Helena, MT 59620

Phone Number (406) 444-0879

Section D - Water Quality Priorities

1. Does your MS4 discharge to waters listed as impaired on the Montana 303(d) List? ☑ Yes ☐ No

Agency Use			
Permit No.:		Date Rec'd	Rec'd By

Montana Department of Environmental Quality

WATER PROTECTION BUREAU

FORM **MS4-AR**

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Section A - Permit Authorization Number for Facility MTR04 0 0 0 6

MS4 Annual Report for Calendar Year 2023

What size population does your MS4 serve? 0 (No Resident Population)

Section B - Facility or Site Information *(See instructions.):*

Small MS4 Name MDT MS4- Butte

Zip Code 59701 and 59702 County Silver Bow

Latitude 45.9688 Longitude -112.5158

Small MS4 Type: Federal ☐ State ☑ County ☐ City/Town ☐ Other ☐

Section C - Applicant (Owner/Operator) Information

Contact Person: Name Tom Martin Title Bureau Chief-Environmental Services

Owner or Operator Montana Dept. of Transportation

Mailing Address PO Box 201011

City, State, and Zip Code Helena, MT 59620

Phone Number (406) 444-0879

Section D - Water Quality Priorities

1. Does your MS4 discharge to waters listed as impaired on the Montana 303(d) List? ☑ Yes ☐ No

Agency Use			
Permit No.:		Date Rec'd	Rec'd By

Montana Department of Environmental Quality

WATER PROTECTION BUREAU

FORM **MS4-AR**

MPDES Storm Water Small MS4 Annual Report Form

This form is to be completed by each permittee or co-permittee authorized to discharge storm water under the *General Permit for Storm Water Discharge Associated with Small Municipal Separate Storm Sewer System (MS4)*. All authorized permittees or co-permittees are required to complete this Annual Report Form for each calendar year the facility is authorized as required in Part IV.I. of the General Permit and to submit it (postmarked) no later than March 1st following the respective calendar year reporting period. For co-permittees authorized under one permit authorization and for co-permittees with multiple permit authorizations, you are required to complete this form and all items on it exclusively for your particular Small MS4 and Storm Water Management Program (SWMP) within your respective regulated Small MS4 area. The Department has attached instructions for this form in order to help with the completion of item responses. **If additional space is needed for item responses, you may include attachments noting the section and item number.**

Section A - Permit Authorization Number for Facility MTR04 0 0 0 7

MS4 Annual Report for Calendar Year 2023

What size population does your MS4 serve? 0 (No Resident Population)

Section B - Facility or Site Information *(See instructions.):*

Small MS4 Name MDT MS4- Missoula

Zip Code 59802 County Missoula

Latitude 46.86667 Longitude -114.0000

Small MS4 Type: Federal ☐ State ☑ County ☐ City/Town ☐ Other ☐

Section C - Applicant (Owner/Operator) Information

Contact Person: Name Tom Martin Title Bureau Chief-Environmental Services

Owner or Operator Montana Dept. of Transportation

Mailing Address PO Box 201011

City, State, and Zip Code Helena, MT 59620

Phone Number (406) 444-0879

Section D - Water Quality Priorities

1. Does your MS4 discharge to waters listed as impaired on the Montana 303(d) List? ☑ Yes ☐ No

Agency Use			
Permit No.:		Date Rec'd	Rec'd By

Montana Department of Environmental Quality

WATER PROTECTION BUREAU

FORM **MS4-AR**

MPDES Storm Water Small MS4 Annual Report Form

This form is to be completed by each permittee or co-permittee authorized to discharge storm water under the *General Permit for Storm Water Discharge Associated with Small Municipal Separate Storm Sewer System (MS4)*. All authorized permittees or co-permittees are required to complete this Annual Report Form for each calendar year the facility is authorized as required in Part IV.I. of the General Permit and to submit it (postmarked) no later than March 1st following the respective calendar year reporting period. For co-permittees authorized under one permit authorization and for co-permittees with multiple permit authorizations, you are required to complete this form and all items on it exclusively for your particular Small MS4 and Storm Water Management Program (SWMP) within your respective regulated Small MS4 area. The Department has attached instructions for this form in order to help with the completion of item responses. **If additional space is needed for item responses, you may include attachments noting the section and item number.**

Section A - Permit Authorization Number for Facility MTR04 0 0 0 9

MS4 Annual Report for Calendar Year 2023

What size population does your MS4 serve? 0 (No Resident Population)

Section B - Facility or Site Information *(See instructions.):*

Small MS4 Name MDT MS4- Helena

Zip Code 59601 & 59602 County Lewis and Clark

Latitude 45.58925 Longitude -111.9937

Small MS4 Type: Federal ☐ State ☑ County ☐ City/Town ☐ Other ☐

Section C - Applicant (Owner/Operator) Information

Contact Person: Name Tom Martin Title Bureau Chief-Environmental Services

Owner or Operator Montana Dept. of Transportation

Mailing Address PO Box 201011

City, State, and Zip Code Helena, MT 59620

Phone Number (406) 444-0879

Section D - Water Quality Priorities

1. Does your MS4 discharge to waters listed as impaired on the Montana 303(d) List? ☑ Yes ☐ No

Agency Use			
Permit No.:		Date Rec'd	Rec'd By

Montana Department of Environmental Quality

WATER PROTECTION BUREAU

FORM **MS4-AR**

MPDES Storm Water Small MS4 Annual Report Form

This form is to be completed by each permittee or co-permittee authorized to discharge storm water under the *General Permit for Storm Water Discharge Associated with Small Municipal Separate Storm Sewer System (MS4)*. All authorized permittees or co-permittees are required to complete this Annual Report Form for each calendar year the facility is authorized as required in Part IV.I. of the General Permit and to submit it (postmarked) no later than March 1st following the respective calendar year reporting period. For co-permittees authorized under one permit authorization and for co-permittees with multiple permit authorizations, you are required to complete this form and all items on it exclusively for your particular Small MS4 and Storm Water Management Program (SWMP) within your respective regulated Small MS4 area. The Department has attached instructions for this form in order to help with the completion of item responses. **If additional space is needed for item responses, you may include attachments noting the section and item number.**

Section A - Permit Authorization Number for Facility MTR04 0 0 1 0

MS4 Annual Report for Calendar Year 2 0 2 3

What size population does your MS4 serve? 0 (No Resident Population)

Section B - Facility or Site Information *(See instructions.):*

Small MS4 Name MDT MS4- Yellowstone County

Zip Code 59101-59108;59111-59112;59114-5911 County Yellowstone

Latitude 45.787397 Longitude -108.499947

Small MS4 Type: Federal ☐ State ☑ County ☐ City/Town ☐ Other ☐

Section C - Applicant (Owner/Operator) Information

Contact Person: Name Tom Martin Title Bureau Chief-Environmental Services

Owner or Operator Montana Dept. of Transportation

Mailing Address PO Box 201011

City, State, and Zip Code Helena, MT 59620

Phone Number (406) 444-0879

Section D - Water Quality Priorities

1. Does your MS4 discharge to waters listed as impaired on the Montana 303(d) List? ☑ Yes ☐ No

2. If yes, identify each impaired water, the impairment, whether a TMDL has been approved by EPA for each, and whether the TMDL assigns a wasteload allocation to your MS4. Use a new line for each impairment, and attach additional pages as necessary.

Impaired Water	Impairment	Approved TMDL	TMDL assigns WLA to MS4
See Appendix D	**See Appendix D**	☐ Yes ☑ No	☐ Yes ☑ No
		☐ Yes ☑ No	☐ Yes ☑ No
		☐ Yes ☑ No	☐ Yes ☑ No
		☐ Yes ☑ No	☐ Yes ☑ No
		☐ Yes ☑ No	☐ Yes ☑ No
		☐ Yes ☑ No	☐ Yes ☑ No
		☐ Yes ☑ No	☐ Yes ☑ No
		☐ Yes ☑ No	☐ Yes ☑ No

3. What specific sources contributing to the impairment(s) are you targeting in your Storm Water Management Program?

See Appendix L, Section D.3 regarding specific sources targeted.

4. Do you discharge to any "high-quality waters" (as defined in 75-5-103, MCA)? ☑ Yes ☐ No

5. Are you implementing additional specific provisions to ensure their continued integrity? ☑ Yes ☐ No

If yes, what are they?

MDT contractors are contractually obligated to follow all applicable water quality protection laws.

Section E - Public Education and Public Participation

1. Is your public education program targeting specific pollutants and sources of those pollutants? ☑ Yes ☐ No

2. If yes, what are the specific sources and/or pollutants addressed by your public education program?

Litter, vehicle fluid leaks, salt/sediment from sanding operations, and sediment from MDT construction projects.

3. Note specific successful outcome(s) (e.g., quantified reduction in fertilizer use; Do Not List tasks, events, publications) fully or partially attributable to your public education program during this reporting period.

We currently do not have quantified outcomes.

4. Do you have an advisory committee or other body comprised of the public and other stakeholders that provides regular input on your SWMP? ☐ Yes ☑ No

See Appendix L, Section E.4 for additional information.

Section F - Construction

1. Do you have an ordinance or other regulatory mechanism stipulating:
   - Erosion and sediment control requirements? ☑ Yes ☐ No
   - Other construction waste control requirements? ☑ Yes ☐ No
   - Requirement to submit construction plans for review? ☑ Yes ☐ No
   - MS4 enforcement authority? ☑ Yes ☐ No

   See Appendix L, Section F.1 for detailed information.

2. Do you have written procedures for:
   - Reviewing construction plans? ☑ Yes ☐ No
   - Performing inspections? ☑ Yes ☐ No
   - Responding to violations? ☑ Yes ☐ No

   See Appendix L, Section F.2 for detailed information.

3. Identify the number of active construction sites, greater than or equal to 1 acre, in operation in your jurisdiction at any time during the reporting period. See Appendix L, F.3

4. How many of the sites identified in F.3. did you inspect during this reporting period? See Appendix L, F.4

5. Describe, on average, the frequency with which your SWMP conducts construction site inspections.
See Appendix L, Section F.5

6. Do you prioritize certain construction sites for more frequent inspections? ☑ Yes ☐ No

If yes, based on what criteria?
See Appendix L, Section F.6

7. Identify which of the following types of enforcement actions you used during the reporting period for construction activities, indicate the number of actions, or note those for which you do not have authority:

☐ Yes	Notice of violation	#0 (zero)	No Authority ☑
☐ Yes	Administrative fines	#0 (zero)	No Authority ☑
☐ Yes	Stop Work Orders	#0 (zero)	No Authority ☐
☐ Yes	Civil penalties	#0 (zero)	No Authority ☑
☐ Yes	Criminal actions	#0 (zero)	No Authority ☑
☐ Yes	Administrative orders	#0 (zero)	No Authority ☑
☑ Yes	Other Contract Enforce	#0 (zero)	

8. Do you use an electronic tool (e.g., GIS, database, spreadsheet) to track the locations, inspection results, and enforcement actions of active construction sites in your jurisdiction? ☑ Yes ☐ No
See Appendix L, Section F.8 for more information.

9. What are the 3 most common types of violations documented during this reporting period?
N/A

10. How often do municipal employees receive training on the construction program?
See Appendix L, Section F.10 regarding training.

Section G - Illicit Discharge Elimination

1. Have you completed a map of all outfalls and receiving waters of your storm sewer system? ☑ Yes ☐ No

2. Have you completed a map of all storm drain pipes and other conveyances in the storm sewer system? ☐ Yes ☑ No

3. Identify the number of outfalls in your storm sewer system. See Appendix L, G.3.

Number of Major outfalls Appendix L, G.3 Number of Minor Outfalls Appendix L, G.3

Are these numbers estimated or measured? Measured

4. Do you have documented procedures, including frequency, for screening outfalls? ☑ Yes ☐ No
See Appendix L, Section G.4.

5. Of the outfalls identified in G.3., how many were screened for dry weather discharges during this reporting period? See Appendix L, G.5.

6. Of the outfalls identified in G.3., how many have been screened for dry weather discharges at any time since you obtained MS4 permit coverage? All of them

7. What is your frequency for screening outfalls for illicit discharges? Describe any variation based on size/type.
The DEES perform dry weather screening at each outfall once per permit cycle per BMP-IDDE-02 of MDT SWMP.

8. Do you have an ordinance or other regulatory mechanism that effectively prohibits illicit discharges? ☐ Yes ☑ No
See Appendix L, Section G.8 for detailed information.

9. Do you have an ordinance or other regulatory mechanism that provides authority for you to take enforcement action and/or recover costs for addressing illicit discharges? ☐ Yes ☑ No
See Appendix L, Section G.9 for detailed information.

10. During this reporting period, how many illicit discharges/illegal connections have you discovered?
5 - See App. O-9 & O-10

11. Of those illicit discharges/illegal connections that have been discovered or reported, how many have been eliminated? No Illicit discharges identified in 2023

12. How often do municipal employees receive training on the illicit discharge program?
Training is to be performed annually for key personnel.

Section H - Storm Water Management for Municipal Operations

1. Have storm water pollution prevention plans (or an equivalent plan) been developed for:

All public parks, ball fields, other recreational facilities and other open spaces?	☐ Yes	☑ No
All municipal construction activities, including those disturbing less than 1 acre?	☑ Yes	☐ No
All municipal turf grass/landscape management activities?	☐ Yes	☑ No
All municipal vehicle fueling, operation and maintenance activities?	☑ Yes	☐ No
All municipal maintenance yards?	☑ Yes	☐ No
All municipal waste handling and disposal areas?	☐ Yes	☑ No

Other
MDT is not a municipality. Items checked 'no' are not under MDT jurisdiction. See Appendix L, H.1 for more info.

2. Are storm water inspections conducted at these facilities? ☑ Yes ☐ No

3. If yes, at what frequency are inspections conducted? MDT facilities are inspected monthly per FPPP

4. List activities for which operating procedures or management practices specific to storm water management have been developed (e.g., road repairs, catch basin cleaning).
Please see Appendix L, Section H.4 for more information.

5. Do you prioritize certain municipal activities and/or facilities for more frequent inspection? ☐ Yes ☑ No

6. If yes, which activities and/or facilities receive most frequent inspections?
N/A

7. Do all municipal employees and contractors overseeing planning and implementation of storm water-related activities receive comprehensive training on storm water management? ☑ Yes ☐ No
See Appendix L, Section H.7 for detailed information.

8. If yes, do you also provide regular updates and refreshers? ☑ Yes ☐ No

9. If so, how frequently and/or under what circumstances?
Pertinent MDT employees are provided with training at least once per permit cycle with updates as needed.

Section I - Long-term (Post-Construction) Storm Water Measures

See Appendix L, Section I.1 for detailed information.

1. Do you have an ordinance or other regulatory mechanism to require:

Site plan reviews for storm water/water quality of all new and re-development projects?	☑ Yes	☐ No
Long-term operation and maintenance of storm water management controls?	☑ Yes	☐ No
Retrofitting to incorporate long-term storm water management controls?	☑ Yes	☐ No

2. If you have retrofit requirements, what are the circumstances/criteria?

MDT requirements are specified in the Permanent Erosion and Sediment Control Manual (PESC Manual).

3. What are your criteria for determining which new/re-development storm water plans you will review (e.g., all projects, projects disturbing greater than one acre, etc.)

All projects under MDT jurisdiction within a MS4 area are reviewed.

4. Do you require water quality or quantity design standards or performance standards, either directly or by reference to a Montana or other standard, be met for new development and re-development? ☑ Yes ☐ No

5. Do these performance or design standards require that pre-development hydrology be met for:

Flow volumes?	☐ Yes	☑ No
Peak discharge rates?	☑ Yes	☐ No
Discharge frequency?	☑ Yes	☐ No
Flow duration?	☐ Yes	☑ No

6. Please provide the URL/reference where all post-construction storm water management standards can be found.

Hydraulics, PESC, and Maintenance Manuals (http://www.mdt.mt.gov/publications/manuals.shtml)

7. How many development and redevelopment project plans were reviewed during the reporting period to assess impacts to water quality and receiving stream protection? 100% - See Appendix L, I.7

8. How many of the plans identified in I.7. were approved? 100% - See Appendix L, I.8

9. How many privately owned permanent storm water management practices/facilities were inspected during the reporting period? N/A - Not within MDT authority

10. How many of the practices/facilities identified in I.9. were found to have inadequate maintenance?

N/A

11. How long do you give operators to remedy any operation and maintenance deficiencies identified during inspections?

Deficiencies are to be corrected as soon as practicable considering pertinent factors, such as safety.

12. Do you have authority to take enforcement action for failure to properly operate and maintain storm water practices/facilities? ☑ Yes ☐ No

If yes, what authority?

Please see Appendix L, Section I.12.

13. How many formal enforcement actions (i.e., more than a verbal or written warning) were taken for failure to adequately operate and/or maintain storm water management practices? 0 (zero)

14. Do you use an electronic tool (e.g., GIS, database, spreadsheet) to track post-construction BMPs, inspections, and maintenance? ☑ Yes ☐ No
See Appendix L, Section I.14 for more information

15. Do all municipal departments and/or staff (as relevant) have access to this tracking system? ☑ Yes ☐ No

16. How often do municipal employees receive training on the post-construction program? As Needed

Section J - Storm Water Management Program Resources

1. What was the annual expenditure to implement MS4 permit requirements this reporting period?
MS4 specific budget not tracked
See Appendix L, Section J.1

2. What is next year's budget for implementing the requirements of your MS4 MPDES permit? Undetermined

3. This year what is/are your source(s) of funding for the MS4 SWMP, and annual revenue (amount or percentage) derived from each?

Source: MDT Environmental Services Bureau Budget Amount $ _____ OR % ____

Source: MDT Maintenance Budgets Amount $ _____ OR % ____

Source: State and federal dollars for highway design and construction Amount $ _____ OR % ____

4. How many FTEs does your municipality devote to the Storm Water Management Program (specifically for implementing the Storm Water Management Program; not municipal employees with other primary responsibilities)?
See Appendix L, Section J.4

5. Do you share Storm Water Management Program implementation responsibilities with any other entities? ☐ Yes ☑ No

Entity	Activity/Task/Responsibility	Your Oversight/Accountability Mechanism
N/A		

Section K - Evaluating/Measuring Progress

1. What indicators do you use to evaluate the overall effectiveness of your Storm Water Management Program, how long have you been tracking them, and at what frequency? These are not measurable goals for individual management practices or tasks, but large-scale or long-term metrics for the overall Storm Water Management Program, such as macro-invertebrate community indices, measures of effective impervious cover in the watershed, indicators of in-stream hydrologic stability, etc.

Indicator	**Began Tracking (year)**	**Frequency**	**Number of Locations**
None			

2. What environmental quality trends have you documented over the duration of your Storm Water Management Program? Reports or summaries can be attached electronically, or provide the URL to where they may be found on the Web. None

Section L - Additional Information

In the space below, please include any additional information on the performance of your MS4 Storm Water Management Program. If providing clarification to any of the questions on this form, please provide the question number (e.g., I.5.) in your response.

Please see Appendix L for additional information.

Section M - Additional Detailed Information: Storm Water Discharge Monitoring

In the space below, please provide the "Evaluation of Storm Water Quality Monitoring Test Results" based on the requirements in Part IV.A.6. of the General Permit. Please also use this space to describe and evaluate any other storm water discharge monitoring which may have occurred during this reporting period.

Per Part IV.A.5 of the 2010 General Permit, MDT is not required to provide Storm Water Quality Monitoring.

Section N - Additional Detailed Information: Summary of Compliance and/or Status of SWMP

Please provide a summary of compliance with respect to General Permit requirements, and the development/implementation of your SWMP. In this section, each permittee must describe the status of SWMP activities and components. Responsible persons, agencies, departments or co-permittees must be included. Each activity/component must specify established goals or performance standards. *(See instructions.)*

Minimum Control Measure Name	General Permit Condition Item Number	SWMP Activity or Component Name	Brief Description of SWMP Activity or Component	Responsible Agency, Department, or Organization; and Person or Position	Development of SWMP Item Completed and/or In Effect (Yes or No, Explain)	Measurable Goal or Performance Standard Utilized
Public Education and Outreach on Storm Water Impacts	II.B.1.					
Public Involvement/ Participation	II.B.2.					
Illicit Discharge Detection and Elimination (IDDE)	II.B.3.					
Construction Site Storm Water Runoff Control	II.B.4.					
Post-Construction Storm Water Management in New Development and Redevelopment	II.B.5.					
Pollution Prevention/Good Housekeeping for Municipal Operations	II.B.6.					

**Please see Appendix N for supplemental information. **

Section O - Additional Detailed Information: Summary of Activities and Description of SWMP Effectiveness During Past Year

Please describe the previous year's activities for the actual implementation of your SWMP and highlight the SMWP's effectiveness, preferably using quantitative indicators. *(See instructions.)*

SWMP Activity or Component Name				
Minimum Control Measure Name (If Applicable)				
General Permit Condition Item Number (If Applicable)	**Please see Appendix O for supplemental information. **			
Brief Description of Planned SWMP Action Taken				
Responsible Agency, Department, or Organization; and Person or Position				
Measurable Goal or Performance Standard Utilized				
Quantitative Indicators Used and Results				
Impact On SWMP Effectiveness				

Section P - Additional Detailed Information: Planned Activities and Changes During Next Year

In attached documentation, please describe activities planned for the next year for the actual implementation of your SWMP, highlighting any changes made to improve control measures and SWMP effectiveness. *(See instructions.)*

SWMP Activity or Component Name	MDT has applied for a Individual Permit; MDT's SWMP and associated BMPs will be evaluated/updated in accordance with the requirements as listed in the Individual Permit. **Please see Appendix P for additional info.**			
Minimum Control Measure Name (If Applicable)				
General Permit Condition Item Number (If Applicable)				
Brief Description of Planned SWMP Action Taken				
Responsible Agency, Department, or Organization; and Person or Position				
Measurable Goal or Performance Standard Utilized				

Section Q - CERTIFICATION

Applicant Information: This form must be completed, signed, and certified as follows (see Section V.K. of the General Permit):

- For a corporation, by a principal officer of at least the level of vice president;
- For a partnership or sole proprietorship, by a general partner or the proprietor, respectively; or
- For a municipality, state, federal, or other public facility, by either a principal executive officer or ranking elected official.

All Applicants Must Complete the Following Certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information; including the possibility of fine and imprisonment for knowing violations. [75-5-633, MCA]

A. Name (Type or Print)		
Tom Martin		
B. Title (Type or Print) Chief - Environmental Services Bureau		C. Phone No. (406) 444-0879
D. Signature	REVIEWED/AUTHORIZED By Tom Martin at 3:26 pm, Feb 27, 2024	E. Date Signed

The Department will not process this form until all of the requested information is supplied. Return this form to:

Department of Environmental Quality
Water Protection Bureau
PO Box 200901
Helena, MT 59620-0901
(406) 444-3080

APPENDIX D

WATER QUALITY PRIORITIES

The Montana Department of Environmental Quality's (MDEQ) Clean Water Act Information Center (CWAIC) was accessed on January 23, 2023, to verify impaired water(s) and associated impairment(s) within each Municipal Separate Storm Sewer System (MS4). The CWAIC mapping features and detailed water quality summaries were used to verify impaired waters within the MS4 boundaries as identified in Montana Department of Transportation's (MDT) MS4 maps. Approved Total Maximum Daily Load (TMDL) documents, as well as MDEQ's 2017 *General Permit for Storm Water Discharges Associated with Small Municipal Separate Storm Sewer Systems* (MDEQ, 2017), were also accessed to verify Waste Load Allocations (WLA) for each MS4. For those causes of impairment with a TMDL and a WLA designated as not applicable (N/A) in the table below, a TMDL and WLA would not be developed for this cause of impairment but would be developed for an associated pollutant (e.g., algae would not have a WLA, but a WLA would be developed for nitrogen and phosphorus.) The following tables outline the findings specific to each MDT Permit Authorization.

MDT Permit Authorization: MTR040001 Billings MS4

Impaired Water	MDT Outfall Discharging to Waterbody?	Impairment	Approved TMDL[1]	TMDL Assigned WLA to MS4
Canyon Creek (MT43F002_021)	Yes	Flow regime modification	N/A	N/A
Yellowstone River (MT43F001_010)	Yes	Algae	N/A	N/A
		Arsenic	No	TBD
		Benthic Macroinvertebrates	N/A	N/A
		Dissolved Oxygen	No	TBD
		Eutrophication	No	TBD
		Oil and Grease	No	TBD
		Periphyton (Aufwuchs) Indicator Bioassessments	N/A	N/A
		Sediment	No	TBD
Yellowstone River (MT43F001_011)	Yes	Cause Unknown	N/A	N/A
		Chlorophyll-a	N/A	N/A
		Nitrate/Nitrite (Nitrite + Nitrate as N)	No	TBD
		Oil and Grease	No	TBD
		Other anthropogenic substrate alterations	N/A	N/A
		Physical substrate habitat alterations	N/A	N/A

N/A = Not Applicable
TBD = To Be Determined

[1] Yellowstone Watershed is listed as a MDEQ priority area scheduled for TMDL completion after 2022.

MDT Permit Authorization: MTR040002 Bozeman MS4

Impaired Water	MDT Outfall Discharging to Waterbody?	Impairment	Approved TMDL	TMDL Assigned WLA to MS4[2]
Bridger Creek (MT41H003_110)	No	Chlorophyll-a	N/A	N/A
		Nitrate/Nitrite (Nitrite + Nitrate as N)	Yes	Yes*
Bear Creek (MT41H003_081)	No	Algae	N/A	N/A
		Alteration in stream-side or littoral vegetative covers	N/A	N/A
		Phosphorus (Total)	Yes	Yes*
		Sedimentation-Siltation	Yes	Yes**
East Gallatin River (MT41H003_010)	Yes	Nitrogen (Total)	Yes	Yes*
		Phosphorus (Total)	Yes	Yes*
Mandeville Creek (MT41H003_021)	Yes	Nitrogen (Total)	Yes	Yes*
		Phosphorus (Total)	Yes	Yes*
Sourdough (Bozeman Creek) (MT41H003_040)	Yes	Alteration in stream-side or littoral vegetative covers	N/A	N/A
		Chlorophyll-a	N/A	N/A
		Escherichia coli	Yes	Yes*
		Nitrogen (Total)	Yes	Yes*
		Sedimentation-Siltation	Yes	Yes**

*The MS4s were assigned a WLA of 0 pounds per day (lbs/day) when the storm water system is not activated. When the storm water system is activated, MDEQ assumes the WLAs are met by adhering to the permit requirements and using monitoring as an adaptive management approach to minimize pollutant loads (MDEQ, 2017).

**Percent reduction allocations were developed for the MS4s. MDEQ assumes adhering to permit Best Management Practices (BMPs) and other requirements equates to meeting the WLAs (MDEQ, 2017).

N/A = Not Applicable

[2] Per MDEQ's 2017 *General Permit for Storm Water Discharges Associated with Small Municipal Separate Storm Sewer Systems* (MDEQ, 2017), WLAs apply to all MS4s that were co-permittees at the time of the *Lower Gallatin Planning Area TMDLs and Framework Water Quality Improvement Plan* (MDEQ, 2013) development; therefore, WLAs are aggregated and not individually assigned to each MS4.

MDT Permit Authorization: MTR040004 Great Falls MS4

Impaired Water	MDT Outfall Discharging to Waterbody?	Impairment	Approved TMDL[3]	TMDL Assigned WLA to MS4
Missouri River (MT41Q001_011)	Yes	Chromium (total)	No	TBD
		Mercury	No	TBD
		Physical substrate habitat alterations	N/A	N/A
		Polychlorinated biphenyls	No	TBD
		Sedimentation-Siltation	No	TBD
		Selenium	No	TBD
		Turbidity	No	TBD
Missouri River (MT41Q001_022)	Yes	Sedimentation-Siltation	No	TBD
Sand Coulee Creek (MT41Q002_040)	No	Lead	No	TBD
		Salinity	No	TBD
		Zinc	No	TBD
Sun River (MT41K001_020)	Yes	Flow regime modification	N/A	N/A
		Nitrogen (Total)	Yes	No
		Phosphorus (Total)	Yes	No*
		Sedimentation-Siltation	Yes	No
		Total Suspended Solids (TSS)	Yes	No

*Although no MS4 WLAs were developed for the Lower Sun River, to meet the intent of the TMDL goals and future recommendations, Great Falls MS4 must follow their permit requirements, evaluate potential impacts to impaired receiving waters, and utilize monitoring to implement an adaptive management approach to minimize pollutant loads (MDEQ, 2017).

N/A = Not Applicable
TBD = To Be Determined

[3] Missouri River – Three Forks to Marias Watershed is listed as a MDEQ priority area scheduled for TMDL completion after 2022.

MDT Permit Authorization: MTR040005 Kalispell MS4

Impaired Water	MDT Outfall Discharging to Waterbody?	Impairment	Approved TMDL	TMDL Assigned WLA to MS4
Middle Ashley Creek (MT76O002_020)	Yes	Flow regime modification	N/A	N/A
		Nitrogen (Total)	Yes	Yes*
		Phosphorus (Total)	Yes	Yes*
		Sedimentation-Siltation	Yes	Yes*
		Temperature	Yes	No**
Lower Ashley Creek (MT76O002_030)	Yes	Alteration in stream-side or littoral vegetative covers	N/A	N/A
		Chlorophyll-a	N/A	N/A
		Dissolved Oxygen	Yes	No
		Nitrate-Nitrite (Nitrite + Nitrate as N)	Yes	No
		Nitrogen (Total)	Yes	Yes*
		Phosphorus (Total)	Yes	Yes*
		Sedimentation-Siltation	Yes	Yes*
		Temperature	Yes	No**
Spring Creek (MT76O002_040)	Yes	Alteration in stream-side or littoral	N/A	N/A
		Arsenic	No	TBD
		Dissolved Oxygen	Yes	No
		Flow Regime Modification	N/A	N/A
		Nitrate-Nitrite (Nitrite + Nitrate as N)	Yes	No
		Nitrogen (Total)	Yes	Yes*
		Phosphorus (Total)	Yes	Yes*
		Physical substrate habitat alterations	N/A	N/A
Stillwater River (MT76P001_010)	Yes	Alteration in stream-side or littoral vegetative covers	N/A	N/A
		Sedimentation-Siltation	Yes	Yes*

*Percent reduction allocations were developed for the City of Kalispell MS4. MDEQ assumes adhering to permit BMPs and other requirements equates to meeting the WLAs (MDEQ, 2017).

**Although no MS4 WLAs were developed for Ashley Creek, to meet the intent of the TMDL goals and future recommendations, City of Kalispell MS4 must follow the minimum control measures provided in the MPDES permit authorization for permit MTR04005, or any subsequent permit renewals (MDEQ, 2014).

N/A = Not Applicable
TBD = To Be Determined

MDT Permit Authorization: MTR040006 Butte MS4

Impaired Water	MDT Outfall Discharging to Waterbody?	Impairment	Approved TMDL	TMDL Assigned WLA to MS4
Silver Bow Creek* (MT76G003_020)	Yes	Arsenic	Yes	Yes*
		Cadmium	Yes	Yes*
		Copper	Yes	Yes*
		Lead	Yes	Yes*
		Mercury	Yes	Yes*
		Nitrate	Yes	No
		Nitrogen (Total)	Yes	Yes**
		Phosphorus (Total)	Yes	Yes**
		Physical substrate habitat alterations	N/A	N/A
		Sedimentation-Siltation	Yes	Yes***
		Zinc	Yes	Yes*

*The WLAs in lbs/day were assigned to the Butte-Silver Bow MS4. MDEQ assumes adhering to permit BMPs and other requirements equates to meeting the WLAs (MDEQ, 2017).

** The Butte-Silver Bow MS4 was assigned a WLA of 0 lbs/day when the storm water system is not activated. When the storm water system is activated, MDEQ assumes the WLAs are met by adhering to the permit requirements and using monitoring as an adaptive management approach to minimize pollutant loads (MDEQ, 2017).

***Percent reduction allocations were developed for the Butte-Silver Bow MS4. MDEQ assumes adhering to permit BMPs and other requirements equates to meeting the WLAs (MDEQ, 2017).

N/A = Not Applicable

MDT Permit Authorization: MTR040007 Missoula MS4

Impaired Water	MDT Outfall Discharging to Waterbody?	Impairment	Approved TMDL	TMDL Assigned WLA to MS4
Bitterroot River (MT76H001_030)	Yes	Alteration in stream-side or littoral vegetative covers	N/A	N/A
		Lead	Yes	No
		Temperature	Yes	No
Clark Fork River (MT76E001_010)	No	Alteration in stream-side or littoral vegetative covers	N/A	N/A
		Arsenic	Yes	No
		Cadmium	Yes	No
		Chlorophyll-a	N/A	N/A
		Copper	Yes	No
		Iron	Yes	No
		Lead	Yes	No
		Mercury	Yes	No
		Nitrogen (Total)	Yes	No
		Phosphorus (Total)	Yes	No
		Zinc	Yes	No
Clark Fork River (MT76M001_020)	Yes	Chlorophyll-a	Yes	No
		Copper	Yes	Yes*
		Iron	Yes	Yes*
		Lead	Yes	Yes*
		Nitrogen (Total)	Yes	No
		Organic Enrichment	Yes	No
		Phosphorus (Total)	Yes	No
Clark Fork River (MT76M001_030)	Yes	Arsenic	Yes	Yes*
		Cadmium	Yes	Yes*
		Copper	Yes	Yes*
		Iron	Yes	Yes*
		Lead	Yes	Yes*
		Eutrophication	Yes	Yes*
		Zinc	Yes	Yes*
Grant Creek (MT76M002_130)	Yes	Alteration in stream-side or littoral vegetative covers	N/A	N/A
		Algae	N/A	N/A
		Flow regime modification	N/A	N/A
		Nitrate/Nitrite (Nitrite + Nitrate as N)	Yes	Yes*
		Nitrogen (Total)	Yes	Yes*
		Sedimentation-Siltation	Yes	Yes*
		Temperature	Yes	Yes

*Percent reduction allocations were assigned to the Missoula MS4. MDEQ assumes adhering to permit BMPs and other requirements equates to meeting the WLAs (MDEQ, 2017).

N/A = Not Applicable

MDT Permit Authorization: MTR040009 Helena MS4

Impaired Water	MDT Outfall Discharging to Waterbody?	Impairment	Approved TMDL	TMDL Assigned WLA to MS4
Prickly Pear Creek (MT41I006_030)	Yes	Alteration in stream-side or littoral vegetative covers	N/A	N/A
		Ammonia (Un-ionized)	No	TBD
		Arsenic	Yes	No
		Cadmium	Yes	No
		Copper	Yes	No
		Lead	Yes	No
		Flow regime modifications	N/A	N/A
		Nitrogen (Total)	Yes	No*
		Phosphorus (Total)	Yes	No*
		Physical substrate habitat alterations	N/A	N/A
		Sedimentation-Siltation	Yes	No*
		Temperature	No	TBD
		Zinc	Yes	No
Prickly Pear Creek (MT41I006_040)	Yes	Alteration in stream-side or littoral vegetative covers	N/A	N/A
		Arsenic	Yes	No
		Cadmium	Yes	No
		Copper	Yes	No
		Lead	Yes	No
		Physical substrate habitat alterations	N/A	N/A
		Sedimentation-Siltation	Yes	No*
		Temperature	Yes	No
		Zinc	Yes	No
Tenmile Creek (MT41I006_143)	No	Alteration in stream-side or littoral vegetative covers	N/A	N/A
		Arsenic	Yes	No
		Cadmium	Yes	No
		Copper	Yes	No
		Lead	Yes	No
		Flow regime modifications	N/A	N/A
		Nitrogen (Total)	Yes	No*
		Eutrophication	Yes	No
		Phosphorus (Total)	Yes	No*
		Sedimentation-Siltation	Yes	No*
		Zinc	Yes	No

*Although no MS4 WLAs were developed for Tenmile Creek and Prickly Pear Creek, to meet the intent of the TMDL goals and future recommendations, Helena MS4 must follow their permit requirements, evaluate potential impacts to impaired receiving waters, and utilize monitoring to implement an adaptive management approach to minimize pollutant loads (MDEQ, 2017).

N/A = Not Applicable
TBD = To Be Determined

MDT Permit Authorization: MTR040010 Yellowstone County MS4

Impaired Water	MDT Outfall Discharging to Waterbody?	Impairment	Approved TMDL[4]	TMDL Assigned WLA to MS4
Yellowstone River (MT43F001_010)	Yes	Algae	N/A	N/A
		Arsenic	No	TBD
		Benthic Macroinvertebrates	No	TBD
		Dissolved Oxygen	No	TBD
		Eutrophication	No	TBD
		Oil and Grease	No	TBD
		Periphyton (Aufwuchs) Indicator Bioassessments	No	TBD
		Sediment	No	TBD
Yellowstone River (MT43F001_011)	Yes	Cause Unknown	N/A	N/A
		Chlorophyll-a	N/A	N/A
		Nitrate/Nitrite (Nitrite + Nitrate as N)	No	TBD
		Oil and Grease	No	TBD
		Other anthropogenic substrate alterations	N/A	N/A
		Physical substrate habitat alterations	N/A	N/A

N/A = Not Applicable
TBD = To Be Determined

[4] Yellowstone Watershed is listed as a MDEQ priority area scheduled for TMDL completion after 2022.

APPENDIX L

ADDITIONAL INFORMATION

Section D. Water Quality Priorities

D.3. Pollutant sources targeted in MDT's Storm Water Management Program include fertilizer, litter, vehicle fluid leaks, salt and sediment from sanding operations, and sediment from MDT construction projects. Educational, training, plan and policy documents have been developed to address these pollutant sources through various means, including:

- Trash, petroleum products, tire wear pollutants, transportation-related spills, RV septic waste, livestock transport waste.
- Fertilizers, pet waste, fats and grease, floor wax, household waste, used oil, wash water, yard waste, paints, chlorine.
- Deicing materials, sanding, fertilizer, petroleum products, paints.
- Indirect – construction related discharge.
- Indirect – post-construction related discharges.

Section E. Public Education and Public Participation

E.4. In 2023, MDT solicited public input to its existing Storm Water Management Program (SWMP) through MDT's public involvement process. This process included a public notice to all MS4s, social media posts, a dedicated webpage on MDT's website requesting SWMP feedback, and a notice to the MS4 working group participants. MDT revised its SWMP in 2023 and provided public notice for 30-days and provided a response to comments prior to finalizing.

Unlike a city or county, MDT does not have its own "citizens" to engage. Instead, users of MDT facilities are transient through the MDT system. As such, MDT's public education efforts typically include social media posts to educate and seek input from a wider audience (i.e., roadway users).

Section F. Construction

F.1. MDT does not have ordinances or regulatory mechanisms of its own. To qualify for federal funding, MDT must comply with all applicable federal regulations. The Federal Highway Administration (FHWA) has requirements specifically related to erosion and sediment control during construction. MDT implements contract provisions to obligate MDT contractors to comply with applicable environmental laws, as well as FHWA's erosion and sediment control requirements. In February 2021, MDT finalized and distributed MS4-specific guidance for Plans, Specifications, and Estimates review to ensure inclusion of MS4-required special provisions into contract documents before projects are let for advertising and construction. Additionally, in December 2021, MDT finalized an Enforcement Response Plan (ERP) that outlines enforcement tools available to MDT for potential noncompliance occurring at MDT-administered construction projects and that provides the framework addressing and reporting noncompliance.

F.2. In February 2016, MDT developed MS4-specific written construction and post-construction inspection procedures for environmental staff to better define MS4 construction review and inspection targets. MDT's construction contracts require contractors to obtain Montana Pollutant Discharge Elimination System (MPDES) stormwater construction general permit coverage for projects that result in disturbances of 1 or more acres. Contractors are required to perform self-inspections for the purpose of complying with the construction general permit and to provide copies of their MPDES permit package and inspection reports to MDT. Once physical work at the site commences, these projects are slated for oversight inspections by the District Environmental Engineering Specialists (DEES). The DEES must review the contractor's erosion control plan during the initial inspection. The DEES will evaluate the project type, disturbance activities, proximity to waterbodies, and contractor performance to determine the appropriate DEES' oversight inspection frequency. MDT construction personnel also perform ongoing

inspections of construction sites, including BMPs, as part of their regular duties. Findings, along with recommended DEES oversight inspection frequency and rational, are documented in a written environmental inspection report and shared with MDT construction personnel and the Field Services Engineer (FSE). If deficiencies are observed, the contractor will be notified and requested to return to contract compliance. In 2021, MDT finalized an ERP that outlines withholding of payment, stop work orders, assessment of contract time, and other ways of intervening if the contractor fails to follow contract provisions.

F.3, F.4. The following table describes the number of active construction sites in each MS4 disturbing 1 or more acres, as well as the number of any construction sites that were inspected in the MS4s in 2023.

MS4 AREA	ACTIVE CONSTRUCTION SITES ≥1 ACRE IN 2023	NO. CONSTRUCTION SITES INSPECTED IN 2023
MTR040001 (BILLINGS)/MTR040010 (YELLOWSTONE CO)	3	4
MTR040002 (BOZEMAN)	2	3
MTR040004 (GREAT FALLS)	1	1
MTR040005 (KALISPELL)	1	3
MTR040006 (BUTTE)	1	1
MTR040007 (MISSOULA)	0	2
MTR040009 (HELENA)	0	0

F.5, F.6. The DEES, MDT construction staff, and contractors all perform construction site inspections on MDT projects. For projects that require MPDES construction storm water permit coverage within an MS4, the DEES are required to conduct an initial oversight inspection when physical work at the site commences. After this initial inspection, the DEES inspection frequency is dependent upon an evaluation of the project type, disturbance activities, proximity to waterbodies, contractor performance, etc. Projects with a greater potential for discharge are targeted for more frequent inspections. Once construction is complete and the contract finalization process has been initiated, the DEES conduct an MPDES walk-through with MDT construction and maintenance staff, as well as the contractor. This walk-through process is intended to ensure that post-construction BMPs are adequate and functioning properly until such time final stabilization is achieved.

F.8. Currently, construction personnel track contract issues through AASHTOWARE, an electronic management system. Additionally, MDT environmental staff use an Excel spreadsheet to track MS4 program items, such as construction project inspections and storm water compliance. This Excel spreadsheet has been expanded to include additional information related to inspection findings and contractor performance.

F.10. The DEES provide storm water training at MDT Construction and Maintenance staff meetings within their respective districts at least once per year. Construction and maintenance personnel are also encouraged to complete MDT's on-line SWPPP Administrator and Water Permitting/BMP training programs, which were updated in 2023. DEES and the Statewide Environmental Engineering Specialist (SEES) attend outside training courses, as necessary, for continuing education purposes.

Section G. Illicit Discharge Elimination

G.3, G.4., G.5. MDT's documentation for outfall screening procedures, including frequency, is specified in MDT's Illicit Discharge Detection and Elimination (IDDE) Investigation and Corrective Action Plan

(CAP) which was finalized in 2021 and updated Dec 2022. This CAP includes an updated Outfall Visual Assessment form and an illicit discharge incident report form to ensure consistent collection of data. The table below details the number and type of outfalls for each MS4, as well as the number screened in 2023.

MS4 AREA	2023 TOTAL OUTFALLS	2023 NO. OF MAJOR OUTFALLS	2023 NO. OF MINOR OUTFALLS	NO. SCREENED IN 2023
MTR040001 (BILLINGS) & MTR40010 (YELLOWSTONE CO)	23	4	19	13
MTR040002 (BOZEMAN)	14	4	10	8
MTR040004 (GREAT FALLS)	2	1	1	2
MTR040005 (KALISPELL)	10	2	8	10
MTR040006 (BUTTE)	21	3	18	10
MTR040007 (MISSOULA)	24	9	15	24
MTR040009 (HELENA)	9	1	8	1

In 2021, MDT updated and completed mapping of MS4 outfalls statewide using procedures outlined in MDT's *MS4 Outfall Inventory Guidance*. In 2022, this new list of outfalls underwent quality control checks. The new list has been verified, and will be used for future dry weather screening activities and will be provided to MDEQ for assistance in drafting MDT's individual permit.

G.8, G.9. The Montana Legislature did not intend for MDT to function as a regulatory body. As a result, MDT's authority is limited to the statute and rules listed below:

- 27-1-202, Montana Code Annotated (MCA). Right to compensatory damages;
- 27-19-104, MCA. Contents of complaint -- action for injunction by an association;
- 61-10-154, MCA. Department of transportation to adopt motor carrier safety standards -- enforcement -- designation of peace officers -- duties – violations;
- Administrative Rules of Montana (ARM) 18.3.104. Reasons for Debarment.

In 2021, MDT developed an ERP which identifies the enforcement tools for the transportation public and MDT's contractors as well as the escalation process and schedule. MDT follows a procedure of contacting the responsible party and asking them to address the illicit discharge for minor violations with low potential to impact water quality. If this procedure does not resolve the discharge, or there are egregious violations with a potential to impact water quality, it will be reported to the appropriate regulatory agencies of City or County Government and/or MDEQ in accordance with MDT policy and applicable laws. MDT will implement enforcement using contract administration tools for MDT-administered construction projects. Training on the new IDDE CAP and ERP was completed in 2022.

Section H. Storm Water Management for Municipal Operations

H.1. MDT does not own or operate public parks, balls fields, other recreational facilities and open spaces, or waste handling and disposal areas. FPPPs are in place for all MDT maintenance facilities located within an MS4. Additionally, Spill Pollution Controls and Countermeasure (SPCC) plans are in place for primary maintenance facilities that meet petroleum storage regulatory thresholds. If construction activities at an MDT facility occurs, the contractor is contractually obligated to adhere to applicable permit requirements including the construction general permit for activities that disturb 1 acre or more.

Maintenance personnel perform and document monthly FPPP inspections at these facilities. The DEES also conduct annual FPPP reviews and document findings in a report. The annual FPPP reports are used to identify and prioritize funding opportunities for MDT maintenance facility site improvements. In 2021, MDT finalized its FPPP Update and Training procedure and initiated updates to each of MDT's

existing FPPPs and associated inspection checklists. MDT finalized the FPPP updates in 2022 and offered site-specific FPPP training to maintenance personnel.

H.4. All current MDT maintenance facilities within an MS4 have a FPPP in place. The FPPPs provide guidelines for storm water management at MDT facilities and their respective inspection frequencies. All MDT facilities are currently on a monthly FPPP inspection schedule. MDT updated and finalized these FPPPs in 2022. FPPPs were reviewed and updated as needed in 2023.

Additional BMPs for maintenance activities are included in MDT's Maintenance Operations and Procedures Manual. A site-specific O&M Manual has also been developed for the stormwater system associated with the KBP-Foys Lake Road interchange project in Kalispell.

H.7. MDT provides its employees with training specific to storm water. As discussed in Section F, the DEES provide storm water training at MDT Construction and Maintenance staff meetings within their respective districts at least once per year. Construction and maintenance personnel are also encouraged to complete MDT's on-line SWPPP Administrator and Water Permitting/BMP training programs, which were updated in 2019. Additionally, MDT contractors are contractually obligated to adhere to applicable permit requirements including the construction general permit requirement for a certified SWPPP administrator. Detailed, comprehensive storm water training is required to become a certified SWPPP Administrator.

Section I. Long-term (Post-Construction) Storm Water Measures

I.1. MDT does not have regulatory authority to create or enforce ordinances. However, to qualify for federal funding, MDT must comply with applicable federal regulations.

At 23 Code of Federal Regulations (CFR) Part 650, Subpart B, FHWA has requirements specifically related to erosion and sediment control on highway projects. In order to meet these federal regulations, MDT developed and implemented Permanent Erosion and Sediment Control (PESC) Design Guidelines (last updated January 2018), which include evaluation of Low Impact Development (LID) practices for consideration in project design. Specific LID proposals are documented on an MS4 LID form during project development and are incorporated into design plans. The design team reviews these plans at various stage of project development (e.g., 30%, 60%, 95% design) to ensure PESC and LID considerations are adequately addressed. MDT has drafted a revision to the LID form that will be used as a plan review checklist for consistent review of plans for MDT projects to document compliance with state and local post-construction requirements. MDT updated the LID review process and in 2023 implemented a new LID review form.

Once projects are constructed, BMPs associated with operation and maintenance of these long-term storm water controls are addressed in Section E of MDT's Maintenance Operations and Procedures Manual. MDT will be evaluating MDT's Maintenance Manual to ensure it can meet the general MS4 operations and maintenance requirements and will identify modifications to the existing tracking database for documenting inspection and maintenance actions.

For private developments requesting access and/or encroachment onto MDT right-of-way, MDT conducts site plan reviews addressing storm water quantity. Through this review, storm water controls may be required as a condition of the approach and/or encroachment permit.

I.7, I.8. The MDT project development process, from project nomination through design to actual construction, is long and complex. During this process, one project may be reviewed multiple times per year over the course of several years. The need for incorporation of PESC and LID measures is evaluated continuously throughout project design. Section 2.0 of the PESC Manual details the evaluation

and design process. MDT implements a statewide process to analyze the appropriateness of incorporating LID Practices into project designs.

I.12. MDT routinely designs PESC and/or LID measures into the contract plans, as necessary. MDT is able to withhold payment or shut down construction operations if a contractor fails to construct, operate, and/or maintain these measures according to the contract documents. When construction is complete, a project may stay under MDT jurisdiction. In those cases, the operation and maintenance of the storm water facilities, such as a retention basin, may fall to MDT maintenance staff. Some projects, once complete, are returned to local government at which point the city/county takes over responsibility and would have the authorities granted under their Small MS4 program.

I.14. Currently, maintenance personnel track issues through an in-house electronic Maintenance Management System (MMS). Additionally, MDT Environmental personnel utilize an Excel tracking spreadsheet for MS4 program items. MDT is currently exploring ways to improve the process of tracking required data.

Section J. Storm Water Management Program Resources

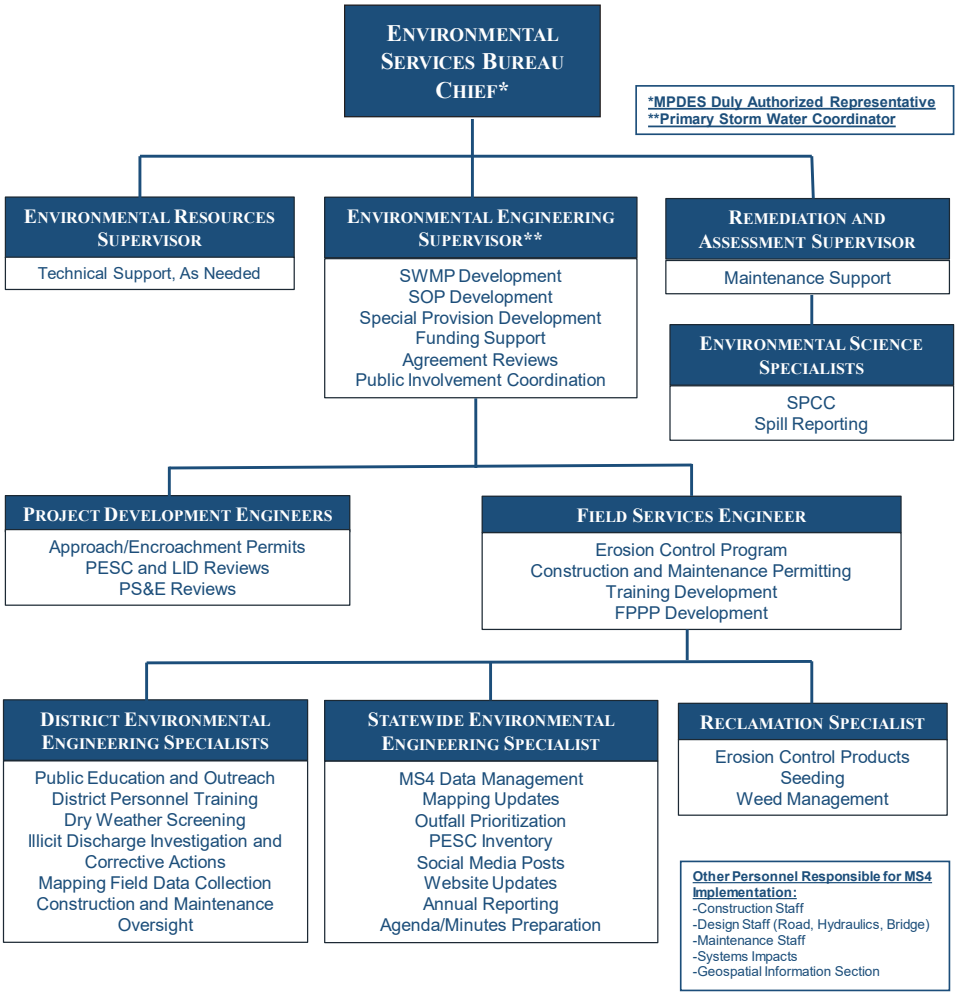
J.1. MDT has extensive staff and a budget specifically devoted to environmental compliance and performance. Additionally, MDT staff are expected to participate in environmental compliance and stewardship activities in their work efforts. Current budget tracking does not allow separation of total values for MS4 compliance and implementation of the SWMP. That said, ongoing improvements occurred in 2023 in support of the MS4 program and include the following:

- Issued an updated SWMP in 2023 and solicited additional public feedback;
- Posted 12 Facebook Posts
- Posted an article in the September issue of Newsline.
- Updated the yearly tracking calendar to facilitate MS4 management and oversight.
- Compiled a list of potential significant non-storm water discharges and added it to the MDT SWMP in May 2023
- Developed an MS4 Storm Water Monitoring Plan October 2023 in anticipation of future permit requirements.
- Updated SWMP Feedback form August 2023
- A construction stormwater management plan review checklist was developed and completed 12/21/2023.
- A new LID form, drafted in 2022 was implemented and updated in May2023.
- A Categorical Exclusion document was updated April 2023.
- FPPP monthly inspection checklist was updated January 2023
- Annual FPPP inspection summary was updated May 2023
- FPPP update and training procedures guidance document was updated June 2023
- Developed a Good Housekeeping/Pollution Prevention poster December 2023, for use at MDT facilities showing the various pollutants associated with MDT facilities and best practices to manage them.
- Created and distributed an MDT IDDE Field Guide
- Developed an online reporting tool specific to IDDE and storm water construction complaints.
- Updated Environmental Construction Inspection form April 2023.
- Updated BMP Inspection Report form April 2023.
- Updated the Facilities Inventory.
- Inspected 100% of facilities each month.
- Completed mapping data collection efforts for other storm water conveyances.

- Refined and updated MS4 maps which will include high priority designations and other pertinent mapping layers.
- Compiled and implemented an erosion control subcontractor stakeholder's group, meetings to be held annually starting in 2024.
- Updated MDT's website and included the ability to report complaints, pollution observed at MDT Construction Sites and Illegal Dumping/Illicit Discharges.
- Developed a Draft Process for offsite treatment on MDT projects to be implemented in 2024.
- Completed an annual update to MDT's Illicit Discharge Detection and Elimination (IDDE) Investigation and Corrective Action Plan (CAP).
- Identified high priority areas and outfalls in accordance with IDDE CAP.
- Completed mapping data collection efforts for other storm water conveyances.
- Updated Facility Pollution Prevention Plans (FPPP).
- Developed a list of potential non-storm water discharges identified as significant contributors of pollutants (i.e., illicit discharges).
- Completed mapping Facility Data that was collected for each MS4 facility.
- Reviewed and updated MDT Storm water Responsibility Table.
- Continued work with MDT Maintenance for implementation of additional Best Management Practices (BMP) at MDT facilities located in MS4s.
- Prioritized funding with MDT Maintenance for implementation of additional Best Management Practices (BMP) at MDT facilities located in MS4s.

J.4. MDT planning, design, construction, and maintenance staff all share responsibilities in implementing MDT's MS4 program. Within MDT's Environmental Services Bureau, 14 staff members are specifically charged with educating MDT personnel and ensuring MS4 program requirements are adhered to statewide. The updated chart below graphically depicts MDT's current MS4 program structure.

The Statewide MS4 Coordinator (also referred to as the MS4 Data Manager) tracks data and facilitates consistency between MDT's multiple MS4 areas. The Environmental Engineering Section Supervisor provides MS4 program management. The Environmental Services Bureau Chief provides program oversight. The FSE and DEES provide MS4 support related to construction and maintenance activities. MDT maintenance and construction staff carry out many duties in support of the MS4 program. The PDEs provide MS4 support related to the pre-construction and developer activities. MDT design and system impact staff carry-out many duties in support of the MS4 program


ENVIRONMENTAL SERVICES BUREAU CHIEF*
*MPDES Duly Authorized Representative
**Primary Storm Water Coordinator
ENVIRONMENTAL RESOURCES SUPERVISOR
Technical Support, As Needed
ENVIRONMENTAL ENGINEERING SUPERVISOR**
SWMP Development
SOP Development
Special Provision Development
Funding Support
Agreement Reviews
Public Involvement Coordination
REMEDIATION AND ASSESSMENT SUPERVISOR
Maintenance Support
ENVIRONMENTAL SCIENCE SPECIALISTS
SPCC
Spill Reporting
PROJECT DEVELOPMENT ENGINEERS
Approach/Encroachment Permits
PESC and LID Reviews
PS&E Reviews
FIELD SERVICES ENGINEER
Erosion Control Program
Construction and Maintenance Permitting
Training Development
FPPP Development
DISTRICT ENVIRONMENTAL ENGINEERING SPECIALISTS
Public Education and Outreach
District Personnel Training
Dry Weather Screening
Illicit Discharge Investigation and Corrective Actions
Mapping Field Data Collection
Construction and Maintenance Oversight
STATEWIDE ENVIRONMENTAL ENGINEERING SPECIALIST
MS4 Data Management
Mapping Updates
Outfall Prioritization
PESC Inventory
Social Media Posts
Website Updates
Annual Reporting
Agenda/Minutes Preparation
RECLAMATION SPECIALIST
Erosion Control Products
Seeding
Weed Management
Other Personnel Responsible for MS4 Implementation:
-Construction Staff
-Design Staff (Road, Hydraulics, Bridge)
-Maintenance Staff
-Systems Impacts
-Geospatial Information Section

APPENDIX N

ADDITIONAL DETAILED INFORMATION: SUMMARY OF COMPLIANCE AND/OR STATUS OF SWMP

SWMP Activity or Component Name	**MDT Website (Internal/External) BMP-PEOIP-01**	**MDT Social Media Posts BMP-PEOIP-02**	**MDT Newsline BMP-PEOIP-03**
Minimum Control Measure Name (If Applicable)	Public Education and Outreach on Storm Water Impacts & Public Involvement/Participation	Public Education and Outreach on Storm Water Impacts	Public Education and Outreach on Storm Water Impacts
General Permit Condition Item Number (If Applicable)	II.B.1/II.B.2	II.B.1	II.B.1
Brief Description of Planned SWMP Action Taken	Develop and utilize a website to provide a variety of storm water educational materials for the public and MDT employees.	Create awareness of storm water specific issues by utilizing MDT social media sites (e.g., Facebook, Instagram).	Create awareness amongst MDT stakeholders of storm water related issues.
Responsible Agency, Department, or Organization; and Person or Position	MDT - SEES	MDT - SEES	MDT - SEES
Development of SWMP Item Completed and/or In Effect (Yes/ No)	Yes	Yes	Yes
Measurable Goal or Performance Standard Utilized	MDT will increase the number of website visits each year. The number of website visits per calendar year will be recorded and reported in the Annual Report. MDT will review the website for currency of information and make updates by April 1st annually. This will be tracked by providing a summary of the identified changes and the date the website was updated. MDT will develop and publish annual report or summary on website. Track by the date incorporated to website. MDT will create an online SWMP feedback reporting tool and incorporate by December 31, 2022. Track by the date incorporated to website. MDT will create an online illicit discharge reporting tool and incorporate by December 31, 2023. Track by the date incorporated to website. Create an online storm water construction complaint reporting tool and incorporate by December 31, 2023. Track by the date incorporated to website.	This BMP will be measured by posting 4 storm water and 1 illicit discharge educational item on social media each year. The number of followers, likes, and comments per year will be tracked and reported in the Annual Report.	MDT will publish one storm water related article each year in MDT Newsline. The distribution numbers will be tracked and reported in the Annual Report.

SWMP Activity or Component Name	**Public Outreach Events BMP-PEOIP-04**	**Public Feedback BMP-PEOIP-05**	**Adopt-A-Highway BMP-PEOIP-06**
Minimum Control Measure Name (If Applicable)	Public Education and Outreach on Storm Water Impacts	Public Involvement/ Participation	Public Involvement/ Participation
General Permit Condition Item Number (If Applicable)	II.B.1	II.B.2	II.B.2
Brief Description of Planned SWMP Action Taken	Provide presentations on storm water issues at schools/universities, conferences, civic clubs, libraries, businesses, etc.	MDT will issue news releases annually in each MS4 soliciting public feedback on the SWMP.	MDT administers a statewide program where volunteers sign a contract to provide clean up services for a section of highway.
Responsible Agency, Department, or Organization; and Person or Position	MDT - DEES	MDT - EESS	MDT - Adopt-A-Highway Program Manager
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes	Yes	Yes
Measurable Goal or Performance Standard Utilized	Participate in one event each year in each MS4, provide printed materials, and solicit input at each event using the SWMP feedback form. The date, location, and number of people in attendance to the event will be tracked. Additionally, the type and number of printed materials and the number of completed feedback forms and comments received will be tracked. Identify and plan events by March 30th and conduct the event by December 31st of each year.	MDT will issue a 30-day public notice in each MS4 soliciting public feedback on the SWMP by June 30th of each year. Date(s) of the public notice and the feedback received will be reported in the Annual Report.	MDT will maintain or increase the number of miles adopted each year under the Adopt-A-Highway program. The number of miles adopted within each MS4 will be reported in the Annual Report.

SWMP Activity or Component Name	**Montana Storm Water Conference Participation BMP-PEOIP-07**	**Erosion Control Contractor Stakeholder Group BMP-PEOIP-08**
Minimum Control Measure Name (If Applicable)	Public Education and Outreach on Storm Water Impacts & Public Involvement/Participation	Public Involvement and Participation
General Permit Condition Item Number (If Applicable)	II.B.1/II.B.2	II.B.2
Brief Description of Planned SWMP Action Taken	MDT personnel to participate in statewide conference, when offered.	Create an MDT erosion control subcontractor stakeholder group to discuss storm water concerns and innovations.
Responsible Agency, Department, or Organization; and Person or Position	MDT - EESS, FSE, DEES, Hydraulics Engineer	MDT - FSE
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes	Yes
Measurable Goal or Performance Standard Utilized	MDT will participate in the Montana Storm Water Conference, when offered. The conference attended and MDT attendance information will be reported in the Annual Report.	MDT will develop an erosion control subcontractor stakeholder group that meets annually to discuss storm water concerns and innovations. This group is to be implemented by December 31, 2023, and stakeholder group participants and meeting attendance will be reported in the Annual Report.

SWMP Activity or Component Name	Non-Storm Water Discharge Identification BMP-IDDE-01	Storm Sewer System Mapping BMP-IDDE-02
Minimum Control Measure Name (If Applicable)	IDDE	IDDE
General Permit Condition Item Number (If Applicable)	II.B.3	II.B.3
Brief Description of Planned SWMP Action Taken	Determine which potential non-storm water discharges or flows are significant and insignificant contributors of pollutants to the MS4.	Develop an interactive geographical information system (GIS)-based MS4 storm sewer map that shows locations of storm sewer system components within each MS4.
Responsible Agency, Department, or Organization; and Person or Position	MDT - SEES	MDT - SEES, DEES, Geospatial Analyst
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes	Yes
Measurable Goal or Performance Standard Utilized	Develop a list of potential non-storm water discharges identified as significant contributors of pollutants (i.e., illicit discharges). Document list in SWMP, along with associated pollutants and local controls. Incorporate in SWMP by December 31, 2023. Annually assess list of non-storm water discharges identified as significant contributors and update SWMP. Beginning in 2025, conduct annual review by March 1st of each year. Incorporate updates into SWMP by September 30th of each year. Annually assess list of non-storm water discharges identified as non-significant contributors that will not be addressed as illicit discharges and update SWMP. Conduct annual review by March 1st of each year. Incorporate updates into SWMP by September 30th of each year. Document compliance in Annual Report.	Complete and update storm sewer system maps for each MS4 illustrating storm sewer system components including outfall locations, inlets, open channels, subsurface conduits/pipes, dry wells, manholes, and other similar discrete conveyances utilizing online interactive GIS mapping tool. Include mapping elements for receiving waters and high priority areas/outfalls. Complete maps by December 31, 2023, and update annually thereafter. Annually review agreements with cities and counties to determine changes to MDT's storm sewer infrastructure responsibility. Provide any updates to agreements in the storm water responsibility table and report in the Annual Report. Update MS4 boundary information as described in MDT's *Mapping Update Procedure* SOP. Annually, report the date the map was updated. Collect new mapping data elements as described in MDT's *Mapping Update Procedure* SOP annually. Report the date the elements are incorporated into the MS4 mapping tool.

SWMP Activity or Component Name	High Priority Assessment BMP-IDDE-03	IDDE Investigation and Corrective Action Plan (CAP) BMP-IDDE-04
Minimum Control Measure Name (If Applicable)	IDDE	IDDE
General Permit Condition Item Number (If Applicable)	II.B.3	II.B.3
Brief Description of Planned SWMP Action Taken	Identify areas and outfalls that are most likely to contribute pollutants to the MS4.	Identifies processes that MDT uses to locate the source of an illicit discharge and select the appropriate corrective action.
Responsible Agency, Department, or Organization; and Person or Position	MDT - SEES	MDT - EESS, DEES
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes	Yes
Measurable Goal or Performance Standard Utilized	MDT will identify high priority areas and outfalls in each MS4 as described in MDT's IDDE CAP. High Priority outfall designation will be completed by December 31, 2023. Update in accordance with MDT's IDDE CAP, which states the criteria for determining high priority outfalls is completed once per permit cycle with the exception of review of dry weather screening for illicit discharges which is completed annually. Review statewide dry weather screening information and illicit discharge incident reports to identify whether there are newly identified high priority outfalls. Report any changes to the High Priority outfall designation in the Annual Report.	Implement procedures described in MDT's IDDE CAP. Track illicit discharge investigations and corrective action data. Update MDT's IDDE CAP annually and report the date the guidance was updated.

SWMP Activity or Component Name	**Enforcement Response Plan (ERP) BMP-IDDE-05**	**Dry Weather Screening BMP-IDDE-06**	**IDDE Field Guidance BMP-IDDE-07**
Minimum Control Measure Name (If Applicable)	IDDE	IDDE	IDDE
General Permit Condition Item Number (If Applicable)	II.B.3	II.B.3	II.B.3
Brief Description of Planned SWMP Action Taken	Identifies policies and procedures for MDT to exert authority over MS4 users.	Inspect outfalls during dry weather to detect illicit discharges and connections into the MS4.	Develop guidance to assist MDT personnel with detection and elimination of illicit discharges into the MS4.
Responsible Agency, Department, or Organization; and Person or Position	MDT - DEES, EESS	MDT - DEES	MDT - SEES
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes	Yes	Yes
Measurable Goal or Performance Standard Utilized	Implement procedures described in MDT's ERP. Report enforcement action data. Review written policies and procedures identified in MDT's ERP and update once every 5 years (i.e., permit cycle).	Conduct dry weather screening at each high priority outfall annually. Conduct dry weather screening at each outfall at least once every five years. The screenings will be tracked utilizing MDT's Outfall Visual Assessment Form.	MDT will develop an IDDE Field Guide that is designed to assist MDT personnel with detection and elimination of illicit discharges into the MS4. Develop field guidance by December 31, 2023, and track distribution numbers.

SWMP Activity or Component Name	**Storm Water Control Contract Provisions BMP-CONST-01**	**Storm water Management Plan Review Checklist BMP-CONST-02**
Minimum Control Measure Name (If Applicable)	Construction Site Runoff Control	Construction Site Runoff Control
General Permit Condition Item Number (If Applicable)	II.B.4	II.B.4
Brief Description of Planned SWMP Action Taken	MDT will use contractual agreements to ensure that projects are constructed in a manner that complies with federal, tribal, state, and local regulations.	MDT will utilize a storm water management plan review checklist to confirm completeness of the CGP SWPPP packages prepared by contractors.
Responsible Agency, Department, or Organization; and Person or Position	MDT - EESS, FSE, PDEs	MDT - FSE, DEES
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes	No (Management Plan checklist is complete and will be in effect 2024)
Measurable Goal or Performance Standard Utilized	Update and maintain standard special provisions for Storm Water Permitting Requirements Under the MPDES and Protection of Storm Water Drainage System and Compliance with Local Permit Requirements. Report date special provision(s) last updated. Update MDT's *Erosion and Sediment Control BMP Manual* as needed to address new or changed regulatory requirements and/or BMP specifications. Report date manual was last updated. Ensure all projects let in MS4s contain the standard special provisions as outlined in MDT's *Plans, Specifications, and Estimates (PS&E) Review Guidance for Projects Located in MS4s* SOP. Track all projects let in each MS4 and verify that required special provisions are included in contract documents. These goals are to be reported in the Annual Report.	Develop a storm water management plan review checklist that documents technology based effluent limitation requirements specified in the most current MPDES CGP. This checklist will be used to confirm completeness of the CGP SWPPP packages prepared by contractors. Complete checklist by December 31, 2023. Beginning January 1, 2024, for projects within MS4s that require MPDES CGP authorization, utilize a storm water management plan review checklist to confirm completeness of the CGP SWPPP packages prepared by contractors. Report projects let in each MS4 that require MDPES CGP authorization, date the checklist is completed and any findings in Annual Report after January 1, 2024.

SWMP Activity or Component Name	Environmental Construction Oversight Inspections BMP-CONST-03	ERP BMP-CONST-04
Minimum Control Measure Name (If Applicable)	Construction Site Runoff Control	Construction Site Runoff Control
General Permit Condition Item Number (If Applicable)	II.B.4	II.B.4
Brief Description of Planned SWMP Action Taken	MDT environmental and construction personnel inspect features as they are being constructed to ensure that they are constructed according to the contract documents and to ensure compliance with federal, tribal, state, and local laws.	Identifies policies and procedures for MDT to exert authority over MDT contractors.
Responsible Agency, Department, or Organization; and Person or Position	MDT - FSE, DEES, EPM and Construction Crews	MDT - EESS, DEES
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes	Yes
Measurable Goal or Performance Standard Utilized	For MDT-administered construction projects, the EPM and/or MDT construction crew will inspect all BMPs bi-weekly and document findings in BMP Inspection Report. Track in AASHTOWARE and perform periodic audit of records in database. Update MDT's *MS4 Construction and Post- Construction DEES Inspection Procedure* SOP and environmental construction oversight inspection checklist as needed to address new or changed regulatory requirements. Report the date of updates in Annual Report. Complete environmental construction oversight inspections in accordance with MDT's *MS4 Construction and Post Construction DEES Inspection Procedure* SOP. Document findings using Environmental Construction Inspection form. Report active construction projects in MS4s, date(s) of environmental oversight inspection(s) and findings, including associated MPDES CGP authorization number, location, size and topography of site, and proximity of site to waterbodies. Document compliance in the Annual Report.	Implement procedures described in MDT's ERP. Review written policies and procedures identified in MDT's ERP and update once every 5 years. Track date of review and date guidance updated.

SWMP Activity or Component Name	**Final Walk-Through BMP-CONST-05**	**Program Evaluation BMP-CONST-06**
Minimum Control Measure Name (If Applicable)	Construction Site Runoff Control	Construction Site Runoff Control
General Permit Condition Item Number (If Applicable)	II.B.4	II.B.4
Brief Description of Planned SWMP Action Taken	During the project finalization process, conduct a final MPDES walk-through for projects that require MPDES CGP coverage. Ensure BMPs are installed and functioning properly. For sites that have not yet reached final stabilization, transfer CGP coverage from contractor to MDT maintenance or a local entity.	Discuss and solicit feedback on storm water-related issues and suggested program improvements.
Responsible Agency, Department, or Organization; and Person or Position	MDT - DEES	MDT - DEES, SEES
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes	Yes
Measurable Goal or Performance Standard Utilized	For projects that require MPDES CGP authorization, conduct a final walk-through inspection in accordance with MDT's MS4 *Construction and Post-Construction DEES Inspection Procedure* SOP. Document findings using Preliminary and Final MPDES/NPDES Permit Walk-through forms, or with MPDES/NPDES Final Stabilization Inspection form for projects where CGP termination is proposed. Track projects let in each MS4 that require MDPES CGP authorization, date of Preliminary and Final Walk-through inspections, and date project closed out. Report annually.	Attend at least one MDT District EPM meeting per year to discuss storm water-related issues and solicit feedback on suggested program improvements. Document feedback using SWMP feedback form(s) and/or through meeting summary. Track date and location of EPM meeting, attendees, topics covered, and feedback received. Report annually. Annually review feedback and determine if there are topics that need to be discussed further with appropriate storm water program staff and whether changes to the SWMP are recommended.

SWMP Activity or Component Name	Construction Site Storm Water Management Public Input BMP-CONST-07	Construction Site Personnel Training BMP-CONST-08
Minimum Control Measure Name (If Applicable)	Construction Site Runoff Control	Construction Site Runoff Control
General Permit Condition Item Number (If Applicable)	II.B.4	II.B.4
Brief Description of Planned SWMP Action Taken	Address storm water complaints identified by the public via MDT's website, social media sites, and/or phone calls.	Train MDT personnel in the selection, implementation, inspection, and maintenance of storm water BMPs.
Responsible Agency, Department, or Organization; and Person or Position	MDT - EPM, DEES	MDT - DEES/SEES
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes	Yes
Measurable Goal or Performance Standard Utilized	Address storm water complaints identified by the public via MDT's website and/or phone calls. Enlist assistance from DEES to resolve. Track project, location, feedback received, and resolution. When requested by EPM, conduct an environmental construction oversight inspection within 14 days of the complaint. Document findings using Environmental Construction Inspection form. Implement these goals by December 31, 2023, and provide documentation for Annual Report thereafter.	Conduct routine construction site SWPPP training in accordance with **Section 2.2.2** of the MDT SWMP document. DEES to conduct annual training event at district level during EPM meetings and section meetings for maintenance personnel.

SWMP Activity or Component Name	**Identify Regulated Projects BMP-POST-01**	**PESC Design BMP-POST-02**
Minimum Control Measure Name (If Applicable)	Post-Construction Site Storm Water Management	Post-Construction Site Storm Water Management
General Permit Condition Item Number (If Applicable)	II.B.5	II.B.5
Brief Description of Planned SWMP Action Taken	Review projects to determine if the project is in an MS4, whether the project is considered a new or redevelopment project, and whether the area of disturbance is expected to be over the applicable regulatory threshold(s).	Describe procedures and methods used to address long-term erosion associated with highway construction and the resultant highway-related storm water runoff.
Responsible Agency, Department, or Organization; and Person or Position	MDT - PDEs	MDT - Road Designers, District Hydraulics Engineer, PDEs, Hydraulics Engineer
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes	Yes
Measurable Goal or Performance Standard Utilized	PDEs will review 100% of MDT administered construction projects to determine if the project is in an MS4, whether the project is considered a new or redevelopment project, and whether the area of disturbance is expected to be over the applicable regulatory threshold(s). The PDEs will document this determination in the project's environmental document (e.g., categorical exclusion, environmental assessment, or environmental impact statement.) PDEs will review 100% of the encroachment and approach permit application environmental checklists for projects located within an MS4. The PDEs will provide appropriate MS4-related information to be included in the permit issuance correspondence. Track completion of environmental documentation and environmental checklists in tracking spreadsheets. Document compliance in the Annual Report.	Evaluate projects in accordance with MDT's *PESC Design Guidelines.* Document recommendations in milestone reports. Assist in selection of appropriate PESC treatment for various types of erosion. In coordination with Road Design, develop plans and specifications for selected PESC. Review projects throughout project development and ensure PESC considered and incorporated into projects as appropriate. In coordination with MDT Environmental Engineering Section, update MDT's *PESC Design Guidelines* as needed to address new or changed regulatory requirements and/or design guidelines. Report date manual last updated. Document compliance in the Annual Report.

SWMP Activity or Component Name	Low Impact Development (LID) Practice Analysis BMP-POST-03	Offsite Treatment Criteria and Formal Review/Approval Process BMP-POST-04
Minimum Control Measure Name (If Applicable)	Post-Construction Site Storm Water Management	Post-Construction Site Storm Water Management
General Permit Condition Item Number (If Applicable)	II.B.5	II.B.5
Brief Description of Planned SWMP Action Taken	Evaluate LID techniques for MDT construction projects and at its facilities within the MS4 areas when upgrades to the facilities are implemented and new or redevelopment takes place.	Develop and apply criteria for determining when offsite treatment may be allowed.
Responsible Agency, Department, or Organization; and Person or Position	MDT - EESS, PDEs, District Hydraulics Engineers	MDT - EESS, Hydraulics Engineer, SEES
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes	No (Plan to complete 2024)
Measurable Goal or Performance Standard Utilized	In coordination with MDT Hydraulics Section, the EESS will update and maintain LID Practice Analysis form as needed to address new or changed regulatory requirements and changes to project development procedures. Identify in environmental document projects that require an LID Practice Analysis and work with District Hydraulics Engineer to document conclusions. For 100% of identified projects, District Hydraulics engineers will complete the LID Practice Analysis form to document how post-construction runoff from the first 0.5 inches of rainfall is being managed. Track dates of updated form and projects that require an LID analysis for Annual Report.	Develop criteria for determining when offsite treatment will be allowed on MDT projects and a formal review and approval process for these determinations. Complete criteria and process by December 31, 2023. Starting January 1, 2024, maintain an inventory of regulated projects that utilize off-site treatment for post-construction storm water runoff. Track projects and document in Annual Report starting January 1, 2025.

SWMP Activity or Component Name	Post-Construction Storm Water Control Inspections BMP-POST-05	Federal Re-Vegetation Management Program BMP-POST-06
Minimum Control Measure Name (If Applicable)	Post-Construction Site Storm Water Management	Post-Construction Site Storm Water Management
General Permit Condition Item Number (If Applicable)	II.B.5	II.B.5
Brief Description of Planned SWMP Action Taken	Consistently and thoroughly inspect PESC features.	Provide additional revegetation efforts when necessary to reach final stabilization for eligible projects.
Responsible Agency, Department, or Organization; and Person or Position	MDT - EPM and Construction Crews, Maintenance Section Personnel, DEES	MDT - SEES, Reclamation Specialist
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes	Yes
Measurable Goal or Performance Standard Utilized	For MDT-administered construction projects where post-construction storm water controls are installed, the EPM and/or MDT construction crew will inspect all BMPs bi-weekly and document findings in BMP Inspection Report. Track in AASHTOWARE and perform periodic audit of results in the database. For projects where MDT is authorized to discharge under the MPDES CGP, maintenance section personnel will inspect post-construction storm water controls (i.e., permanent erosion and sediment controls) in accordance with permit requirements. Inspections will be documented using DEQ's self-inspection report form. Perform periodic audit of maintenance SWPPP documents and document compliance in Annual Report. For other post-construction storm water control inspections, maintenance section personnel will conduct routine inspections in accordance with agreements, MDT's Maintenance Manual, and site-specific O&M Manuals, as applicable. Findings will be documented in Maintenance Management System (MMS). Track in MMS and perform periodic audit of records in database. For projects that have reached final stabilization and termination under the CGP is proposed, the DEES will inspect the site and document findings with MPDES/NPDES Final Stabilization Inspection form. For MDT authorizations, the DEES will also complete a Notice of Termination. Record project name, MDPES CGP authorization number, date(s) inspected, final stabilization determination, date NOT issued.	Annually, the SEES will identify projects with open CGP permits held by MDT for more than two growing seasons. The SEES will provide the list to the FSE and Reclamation Specialist for consideration of project nomination under the ESB-administered federal re-vegetation program. Track identified project name, MDPES CGP authorization number, and recommended improvement(s). Report number of projects nominated in Annual Report. For projects nominated within MS4s, the reclamation specialist will determine if improvements to storm water run-off control and infiltration can be improved with further re-vegetation using the Federal Revegetation Management Program. If improvements are identified, the reclamation specialist will develop and let a contract under this program. Report Dates(s) and location(s) of projects let under Federal Revegetation Management Program in an MS4for Annual Report.

SWMP Activity or Component Name	ERP BMP-POST-07	Post-Construction Storm Water Control Inventory BMP-POST-08
Minimum Control Measure Name (If Applicable)	Post-Construction Site Storm Water Management	Post-Construction Site Storm Water Management
General Permit Condition Item Number (If Applicable)	II.B.5	II.B.5
Brief Description of Planned SWMP Action Taken	Identifies policies and procedures for MDT to exert authority over MDT contractors.	Maintain an inventory of post-construction storm water management controls.
Responsible Agency, Department, or Organization; and Person or Position	MDT - EESS, DEES	MDT - SEES
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes	No (Plan to complete 2024)
Measurable Goal or Performance Standard Utilized	Implement procedures described in MDT's ERP. Review written policies and procedures identified in MDT's ERP and update as needed. Update once every 5 years (i.e., permit cycle).	Beginning January 1, 2023, develop and maintain an inventory of post-construction storm water controls utilizing information contained in milestone reports, hydraulics reports, LID Practice Analysis form, and construction plans and specifications. Record for Annual Report starting January 1, 2024.

SWMP Activity or Component Name	Inspection Prioritization BMP-POST-09	Program Evaluation BMP-POST-10
Minimum Control Measure Name (If Applicable)	Post-Construction Site Storm Water Management	Post-Construction Site Storm Water Management
General Permit Condition Item Number (If Applicable)	II.B.5	II.B.5
Brief Description of Planned SWMP Action Taken	Utilize a protocol to determine priority and minimum inspection frequency of post construction storm water management controls.	Discuss and solicit feedback on storm water-related issues and suggested program improvements.
Responsible Agency, Department, or Organization; and Person or Position	MDT - FSE, Maintenance Division Operations Manager, SEES, DEES	MDT - DEES, SEES
Development of SWMP Item Completed and/or In Effect (Yes/No)	No (Begin implementation 2024)	Yes
Measurable Goal or Performance Standard Utilized	In coordination with MDT Maintenance Division, develop a protocol to determine priority and minimum inspection frequency for post-construction storm water controls. Priority must be based on potential water quality impacts, with consideration for the operation and maintenance needs, proximity to waterbodies, drainage area treated, land use type, and location within an impaired watershed. Complete by December 31, 2023. In coordination with MDT Maintenance Division, develop a post-construction storm water control inspection checklist for incorporation into MMS. Complete by December 31, 2023. With financial support from ESB, incorporate additional fields into MMS to capture post-construction storm water control inspection information. Communicate inspection requirements to maintenance personnel. Complete by December 31, 2024. Update post-construction storm water control inventory with priority ranking and minimum inspection frequency. Report priority ranking and inspection frequency in Annual Report starting January 1, 2025. Communicate with maintenance section personnel the post-construction storm water control inspection frequency and assist with inspections as requested. Track dates of communication and assistance, maintenance personnel involved and perform periodic audit of records in MMS.	DEES to attend at least one MDT Maintenance Division section person meeting per year to discuss storm water-related issues and solicit feedback on suggested program improvements. Document feedback using SWMP feedback form(s) and/or through meeting summary. Report meeting metrics in Annual Report. SEES to annually review feedback and determine if there are topics that need to be discussed further with appropriate storm water program staff and whether changes to the SWMP are recommended. Provide review of feedback in Annual Report to see if changes are necessary.

SWMP Activity or Component Name	**Post-Construction Site Personnel Training** **BMP-POST-11**
Minimum Control Measure Name (If Applicable)	Post-Construction Site Storm Water Management
General Permit Condition Item Number (If Applicable)	II.B.5
Brief Description of Planned SWMP Action Taken	Train MDT personnel in the selection, implementation, inspection, and maintenance of storm water BMPs.
Responsible Agency, Department, or Organization; and Person or Position	MDT - EESS, Highways Engineer
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes
Measurable Goal or Performance Standard Utilized	MDT will conduct routine post-construction storm water training to educate plan reviewers and inspectors on PESC and LID design, construction, and maintenance requirements in accordance with **Section 2.2.3** of MDT's SWMP document. To be completed once every 5 years (i.e., permit cycle).

SWMP Activity or Component Name	**MDT Facility and Activity Inventory BMP-PPGH-01**	**MDT Facility and Activity Mapping BMP-PPGH-02**
Minimum Control Measure Name (If Applicable)	Pollution Prevention / Good Housekeeping	Pollution Prevention / Good Housekeeping
General Permit Condition Item Number (If Applicable)	II.B.6	II.B.6
Brief Description of Planned SWMP Action Taken	Develop and maintain inventory of MDT-owned and operated facilities and activities.	Add MDT facilities to MS4 maps.
Responsible Agency, Department, or Organization; and Person or Position	MDT - SEES	MDT - SEES, Geospatial Analyst
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes	Yes
Measurable Goal or Performance Standard Utilized	Develop and maintain an inventory of MDT-owned or operated facilities and activities that have the potential to contribute contaminants to the MS4. Develop inventory by December 31, 2022, and update annually.	Complete and update MS4 maps illustrating the location of each facility and activity identified in the MDT Facility and Activity Inventory. Complete maps by December 31, 2023, and update annually.

SWMP Activity or Component Name	**FPPPs and Spill Prevention, Controls, and Countermeasures (SPCCs) BMP-PPGH-03**
Minimum Control Measure Name (If Applicable)	Pollution Prevention / Good Housekeeping
General Permit Condition Item Number (If Applicable)	II.B.6
Brief Description of Planned SWMP Action Taken	Develop and implement FPPPs to identify facility-specific potential pollutant sources, associated BMPs, and inspection protocols. Incorporate SPCC plans into the FPPPs for facilities with a total aboveground oil storage capacity greater than 1,320 gallons.
Responsible Agency, Department, or Organization; and Person or Position	MDT - FSE, DEES, SEES, Maintenance Chief, FPPP Inspector
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes
Measurable Goal or Performance Standard Utilized	Ensure each MDT facility located within an MS4 has a site-specific FPPP. If the facility also has an SPCC plan, ensure it is appended to the FPPP. Update in accordance with MDT's *FPPP Update and Training Procedure* SOP. Ensure FPPP is implemented and assign FPPP Inspector. Review FPPP and conduct monthly inspections of the facility. Complete FPPP Inspection Checklist monthly. Review monthly inspection forms and ensure corrective action(s) taken. Review inspection forms and confirm identified corrective actions have occurred. Maintain central repository of inspection and FPPP documents. Distribute documents in accordance with MDT's *FPPP Inspection Transmittal Procedure* SOP. Complete Monthly. Document compliance in the Annual Report.

SWMP Activity or Component Name	**Facility Storm Water Control Updates BMP-PPGH-04**	**Facility Storm Water Awareness Posters BMP-PPGH-05**	**Field and Facility Personnel Training BMP-PPGH-06**
Minimum Control Measure Name (If Applicable)	Pollution Prevention / Good Housekeeping	Pollution Prevention / Good Housekeeping	Pollution Prevention / Good Housekeeping
General Permit Condition Item Number (If Applicable)	II.B.6	II.B.6	II.B.6
Brief Description of Planned SWMP Action Taken	Establishes funding prioritization for storm water control enhancements at existing MDT facilities.	Create storm water BMP poster for use at MDT maintenance facilities.	Educate staff regarding storm water characteristics, water quality issues, and individual responsibilities regarding the implementation of the Statewide SWMP, FPPPs, SPCC plans, and associated SOPs.
Responsible Agency, Department, or Organization; and Person or Position	MDT - DEES, SEES, FSE, EESS, Facilities Bureau Chief	MDT - SEES	MDT - DEES, SEES
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes	Yes	Yes
Measurable Goal or Performance Standard Utilized	DEES conduct an onsite review of each facility and complete the Annual FPPP Inspection Summary form in accordance with the *FPPP Update and Training Procedure* SOP. Identify recommended storm water control updates. Complete annually by end of year. SEES, FSE, EESS review each of the Annual FPPP Inspection Summary forms and prioritize funding for recommended storm water control updates. To be completed by April 1st annually. Annually meet to prioritize facility projects for funding that will benefit water quality in the MS4s (e.g., vehicle wash bays, secondary containment, salt/sand shed, handling and storage, etc.) and develop a schedule for implementation. ESB funding will be provided for facility projects that will be completed within the schedule. Meeting to be held by May 1st annually.	Develop a poster for use at MDT facilities showing the various pollutants associated with MDT facilities and best practices to manage them. Complete and distribute poster by no later than December 31, 2023.	Conduct site-specific FPPP training in accordance with MDT's *FPPP Update and Training Procedure* SOP and **Section 2.2.4** of MDTs SWMP document. To be completed every 3 years. Develop an on-line IDDE training program for use by MDT field personnel. Incorporate requirements described in **Section 2.2.4** of MDTs SWMP document. To be completed by December 31, 2024.

SWMP Activity or Component Name	**Maintenance Manual and SOPs BMP-PPGH-07**	**Street Sweeping BMP-PPGH-08**	**Winter Maintenance Program BMP-PPGH-09**
Minimum Control Measure Name (If Applicable)	Pollution Prevention / Good Housekeeping	Pollution Prevention / Good Housekeeping	Pollution Prevention / Good Housekeeping
General Permit Condition Item Number (If Applicable)	II.B.6	II.B.6	II.B.6
Brief Description of Planned SWMP Action Taken	Review and update MDT's Maintenance Manual and SOPs to address new or changed regulatory requirements and/or design guidelines.	Implement a street sweeping program that encompasses the streets and roadways, maintenance yards, and parking areas that MDT is responsible for maintaining. The street sweeping frequency depends on need and travel volumes. Sweepers also respond to certain types of spills that require clean-up.	MDT will evaluate the Winter Maintenance Program for feasible ways to transition to more environmentally friendly methods.
Responsible Agency, Department, or Organization; and Person or Position	MDT - Maintenance Division Operations Manager, EESS	MDT - Maintenance Personnel	MDT - EESS, FSE
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes	Yes	No (plan to be implemented in 2024)
Measurable Goal or Performance Standard Utilized	In coordination with MDT Environmental Engineering Section, update MDT's *Maintenance Operations and Procedures Manual* as needed to address new or changed regulatory requirements and/or design guidelines. Develop written SOPs and/or site-specific O&M Manuals when needed to address new or changed regulatory requirements and/or design guidelines. Update once every 5 years (i.e., permit cycle).	Sweep 100% of the facilities and MDT maintained roads within small MS4s a minimum of one time each year. Recycle sanding materials whenever feasible. Track miles swept, year and location. Report in Annual Report.	Review Winter Maintenance Plans for areas/sections located in MS4s. Make recommendations for environmental considerations, as appropriate. Update once every 5 years (i.e., permit cycle).

SWMP Activity or Component Name	**Roadside Weed Management** **BMP-PPGH-010**
Minimum Control Measure Name (If Applicable)	Pollution Prevention / Good Housekeeping
General Permit Condition Item Number (If Applicable)	II.B.6
Brief Description of Planned SWMP Action Taken	Minimize the use of chemical spraying for roadside weed management.
Responsible Agency, Department, or Organization; and Person or Position	MDT - Reclamation Specialist
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes
Measurable Goal or Performance Standard Utilized	Work with maintenance personnel to encourage mechanical mowing vegetation management whenever possible. For instances when chemical spraying is necessary, follow the recommendations outlined in MDT's *Statewide Integrated Roadside Vegetation Management Plan* and conduct spraying under the supervision of a licensed chemical applicator. Contact maintenance once every 5 years (i.e., permit cycle).

APPENDIX O

ADDITIONAL DETAILED INFORMATION: SUMMARY OF ACTIVITES AND DESCRIPTION OF SWMP EFFECTIVENESS DURING PAST YEAR

For MDT MS4 purposes, MDT's Billings DEES functions are the same for both Billings and Yellowstone County. Many of the activities MDT completed do not provide a distinction between Billings and Yellowstone County. Some activities may be identical between these two (2) MS4s or listed as Billings/Yellowstone County MS4.

SWMP Activity or Component Name	**Website (Internal/External)** **BMP-PEOIP-01**
Minimum Control Measure Name (If Applicable)	Public Education and Outreach on Storm Water Impacts & Public Involvement/Participation
General Permit Condition Item Number (If Applicable)	II.B.1/II.B.2
Brief Description of Planned SWMP Action Taken	Develop and utilize a website to provide a variety of storm water educational materials for the public and MDT employees.
Responsible Agency, Department, or Organization; and Person or Position	MDT - SEES
Measurable Goal or Performance Standard Utilized	• MDT will increase the number of website visits each year. The number of website visits per calendar year will be recorded and reported in the Annual Report. • MDT will review the website for currency of information and make updates by April 1st annually. This will be tracked by providing a summary of the identified changes and the date the website was updated. • MDT will develop and publish annual report or summary on website. Track by the date incorporated to website. • MDT will create an online SWMP feedback reporting tool and incorporate by December 31, 2022. Track by the date incorporated to website. • MDT will create an online illicit discharge reporting tool and incorporate by December 31, 2023. Track by the date incorporated to website. • Create an online storm water construction complaint reporting tool and incorporate by December 31, 2023. Track by the date incorporated to website.

Quantitative Indicators Used and Results	• Number of website visits
	  • January 1, 2023 – December 31, 2023 – Storm water Program (and subpages) had 3,651 total pageviews. Up from 2,506 total pageviews in 2022.
	• Last updates to the MS4 Storm water website
	  • 2/15/2023 MDT reviewed the website for currency of information. The website was updated 2/23/23 and 5/01/2023.
	  • MDT SWMP was updated July 2023 and December 2023.
	  • SWMP Public Notice Language was updated 8/04/2023 and 9/12/2023.
	  • MS4 Contacts list was updated May 2023.
	  • FPPP site changes were made 3/07/2023.
	• MDT posted the Annual Report 2/27/23.
	• MDT created an online SWMP feedback reporting tool which was incorporated into the external website in 2022 website linked below. https://www.mdt.mt.gov/pubinvolve/stormwater/
	• MDT created an online Illicit Discharge reporting tool which was incorporated into the external website 2/23/2023. "Report pollution" tab found on linked page below. https://www.mdt.mt.gov/pubinvolve/stormwater.
	• Storm Water Construction complaints can be made in the comment form found on MDT's main webpage. https://www.mdt.mt.gov/contact/comment-form.aspx

Impact on SWMP Effectiveness	Provide accessible public education materials to a diverse and widespread audience.

SWMP Activity or Component Name	**Social Media Posts** **BMP-PEOIP-02**	**Newsline** **BMP-PEOIP-03**
Minimum Control Measure Name (If Applicable)	Public Education and Outreach on Storm Water Impacts	Public Education and Outreach on Storm Water Impacts
General Permit Condition Item Number (If Applicable)	II.B.1	II.B.1
Brief Description of Planned SWMP Action Taken	Create awareness of storm water specific issues by utilizing MDT social media sites (e.g., Facebook, Instagram).	Create awareness amongst MDT stakeholders of storm water related issues.
Responsible Agency, Department, or Organization; and Person or Position	MDT - SEES	MDT - SEES
Measurable Goal or Performance Standard Utilized	This BMP will be measured by posting 4 storm water educational items and 1 illicit discharge educational item on social media each year. This will be tracked by reporting the number of followers, likes, and comments per year.	MDT will publish one storm water related article each year in MDT Newsline. The distribution numbers will be reported.
Quantitative Indicators Used and Results	In 2023, MDT posted 12 Facebook posts,two of which discussed Illicit Discharge. Six comments and 110 reactions to the 12 FB posts. In 2023 the MDT Facebook account has 55K followers up from 48K followers in 2022, a 14.5% increase. No Instagram posts were made related to MS4. The MDT Instagram account has 5103 followers up from 3966 followers in 2022 a 28.7% increase	MDT published one article in the September Newsline Issue Titled: **“MDT is Updating Its Storm Water Management Program.”** https://www.mdt.mt.gov/publications/docs/newsletters/newsline/2023/newsep23.pdf The September 2023 Newsline was printed and mailed to 4,363 contacts. The electronic edition was emailed through GovDelivery to 1,412 contacts.
Impact on SWMP Effectiveness	Passive outreach strategy that allows sharing of a unified statewide message on storm water to a diverse and widespread audience.	Passive outreach strategy that allows for more targeted messaging specific to each MS4.

SWMP Activity or Component Name	**Public Outreach Events** **BMP-PEOIP-04**
Minimum Control Measure Name (If Applicable)	Public Education and Outreach on Storm Water Impacts
General Permit Condition Item Number (If Applicable)	II.B.1
Brief Description of Planned SWMP Action Taken	Provide presentations on storm water issues at schools/universities, conferences, civic clubs, libraries, businesses, etc.
Responsible Agency, Department, or Organization; and Person or Position	MDT - DEES
Measurable Goal or Performance Standard Utilized	DEES to participate in one event each year in each MS4, provide printed materials, and solicit input at each event using the SWMP feedback form. Identify and plan events in each MS4 by no later than March 30th of each year and conduct Outreach activities no later than Dec 31st each year. The date, location, and number of people in attendance to the event will be provided. Additionally, the type and number of printed materials and the number of completed feedback forms and comments received will be tracked.
Quantitative Indicators Used and Results	The DEES attended public outreach events in 6 of the MS4 areas in 2023. **Missoula MS4** 8 hours of Outreach at the Missoula County Fair 8/10/2023. • 9 of 60 Preventing Storm water Pamphlets received by public. • 17of 50 IDDE Brochures. **Missoula Main office**: PSP Pamphlets Available yearlong. • 6 total for 2023 **Kalispell MS4**: 6 hours of Outreach at the NW Montana Fair in Kalispell 8/16/2023. • 9 of 60 Preventing Storm water Pollution Pamphlets received by public. • 17of 50 IDDE Brochures **Kalispell Main Office**: PSP Pamphlets Available yearlong. • 9 total for 2023 . **Great Falls MS4** College of Great Falls 3/07/2023 • Handed out 38 Pamphlets and crossword at the Science Fair. Discussions regarding MS4 protection/importance. Erosion control matting/blanket demonstration. **Bozeman MS4:** 10/26/2023 Public Library, Bozeman. • Handed out 12 Pamphlets, crossword and discussed the MS4 program. **Butte MS4:** 2/15/2023 Butte High Career & Technical Education Fair, Butte • Handed out 55 pamphlets, crossword, and discussed MS4 program. **Butte MS4**:4/5/2023 Highland College of Montana Tech • Handed out 9 pamphlets, crossword, and discussed MS4 program. **Billings** MS4: Billings Library -13 attendees; Handed out: • 2 storm water crossword puzzles and 4 Storm water Prevention and 6 IDDE pamphlets. **Helena MS4** • **No Events were attended in 2023.**
Impact on SWMP Effectiveness	Active outreach strategy that allows for more targeted messaging specific to each MS4.

SWMP Activity or Component Name	Public Feedback BMP-PEOIP-05	Adopt-A-Highway BMP-PEOIP-06
Minimum Control Measure Name (If Applicable)	Public Involvement/Participation Public Feedback	Public Involvement/Participation Adopt-A-Highway
General Permit Condition Item Number (If Applicable)	II.B.2	II.B.2
Brief Description of Planned SWMP Action Taken	MDT will issue news releases annually in each MS4 soliciting public feedback on the SWMP.	MDT administers a statewide program where volunteers sign a contract to provide clean up services for a section of highway.
Responsible Agency, Department, or Organization; and Person or Position	MDT - EESS	MDT - Adopt-A-Highway Program Manager
Measurable Goal or Performance Standard Utilized	MDT will issue a 30-day public notice in each MS4 soliciting public feedback on the SWMP. Date(s) of the public notice and the feedback received will be reported in the Annual Review.	MDT will maintain or increase the number of miles adopted each year under the Adopt-A-Highway program.
Quantitative Indicators Used and Results	On August 7, 2023, the Montana Department of Transportation (MDT) announced a public review and comment period for its draft updated Municipal Separate Storm Sewer System (MS4) Storm Water Management Program (SWMP). The duration of this public comment period was 30-days, closing on September 6, 2023. The intent of this public comment period was to solicit input on the draft final SWMP document to improve the implementation of MDT's program since the public can be an effective partner in improving water quality by building greater environmental awareness, leveraging support in achieving water quality goals, and increasing compliance. Listed below are the entities who submitted comments in the order of date received: • Gina Hodges, City of Kalispell September 6, 2023 • Adam Oliver, City of Bozeman August 18, 2023 • Erin Mooer, City of Billings August 11, 2023	MDT's Adopt-a-Highway program is available and active. Organizations that adopt MDT's roadways agree to pick up trash two (2) times per year. In 2023, The total miles (sections) of adopted highway that either fall within or intersect the MS4 boundaries is **147**. 46 fewer than in 2022. A breakdown of these miles by MS4 can be found below. • Billings/Yellowstone County: 46 miles (2 miles less than 2022) • Bozeman: 11 miles (2 miles less 2022) • Butte: 8 miles • Great Falls: 18 (11 miles less than 2022) • Helena: 11 miles (7 miles less than 2022) • Kalispell: 10 • Missoula 42 miles (16 less than 2022)
Impact on SWMP Effectiveness	Active outreach strategy that provides notice and opportunity for public to become involved in development of SWMP.	Active outreach strategy that engages volunteers and allows participation in reducing pollution in waterways.

SWMP Activity or Component Name	Montana Storm Water Conference Participation BMP-PEOIP-07	Erosion Control Contractor Stakeholder Group BMP-PEOIP-08
Minimum Control Measure Name (If Applicable)	Public Education and Outreach on Storm Water Impacts & Public Involvement/Participation	Public Involvement and Participation Erosion Control Contractor Stakeholder Group
General Permit Condition Item Number (If Applicable)	II.B.1/II.B.2	II.B.2
Brief Description of Planned SWMP Action Taken	MDT personnel to participate in statewide conference, when offered.	Create an MDT erosion control subcontractor stakeholder group to discuss storm water concerns and innovations.
Responsible Agency, Department, or Organization; and Person or Position	MDT - EESS, FSE, DEES, Hydraulics Engineer	MDT - FSE
Measurable Goal or Performance Standard Utilized	MDT will participate in the Montana Storm Water Conference, when offered.	MDT will develop an erosion control subcontractor stakeholder group that meets annually to discuss storm water concerns and innovations. This group is to be implemented by December 31, 2023.
Quantitative Indicators Used and Results	The DEQ Storm water Conference was not offered in 2023.	MDT has compiled and implemented a subcontractor stakeholder group. Stakeholder meetings will be held annually starting spring 2024.
Impact on SWMP Effectiveness	Active outreach strategy that allows MDT personnel to be exposed to innovative storm water solutions and to network and engage with other MS4 representatives.	Active outreach strategy that allows MDT contractors who specialize in storm water controls to engage with MDT on its erosion control program and opportunities for improvement.

SWMP Activity or Component Name	Non-Storm Water Discharge Identification BMP-IDDE-01
Minimum Control Measure Name (If Applicable)	IDDE Non-Storm Water Discharge Identificaton
General Permit Condition Item Number (If Applicable)	II.B.3
Brief Description of Planned SWMP Action Taken	Determine which potential non-storm water discharges or flows are significant and insignificant contributors of pollutants to the MS4.
Responsible Agency, Department, or Organization; and Person or Position	MDT - SEES
Measurable Goal or Performance Standard Utilized	Develop a list of potential non-storm water discharges identified as significant contributors of pollutants (i.e., illicit discharges). Document list in SWMP, along with associated pollutants and local controls. Incorporate in SWMP by December 31, 2023. Annually assess list of non-storm water discharges identified as significant contributors and update SWMP. Beginning in 2025, conduct annual review by March 1st of each year. Incorporate updates into SWMP by September 30th of each year. Annually assess list of non-storm water discharges identified as non-significant contributors that will not be addressed as illicit discharges and update SWMP. Conduct annual review by March 1st of each year. Incorporate updates into SWMP by September 30th of each year.
Quantitative Indicators Used and Results	A list of potential significant non-storm water discharges was completed on 4/24/2023 and was added to MDT SWMP in May 2023. This list is intended to align with the requirements of the 2022 MS4 General Permit issued by the Montana Department of Environmental Quality. The list of non-significant discharges was assessed during 2023 SWMP updates and will continue to be assessed annually . The final SWMP update was processed and reviewed in September 2023 and completed November 2023.
Impact on SWMP Effectiveness	Allows MDT to focus investigative and corrective action efforts on significant contributors of pollutants to the MS4.

SWMP Activity or Component Name	Storm Sewer System Mapping BMP-IDDE-02
Minimum Control Measure Name (If Applicable)	IDDE Storm Sewer System Mapping
General Permit Condition Item Number (If Applicable)	II.B.3
Brief Description of Planned SWMP Action Taken	Develop an interactive geographical information system (GIS)-based MS4 storm sewer map that shows locations of storm sewer system components within each MS4.
Responsible Agency, Department, or Organization; and Person or Position	MDT - SEES, DEES, Geospatial Analyst
Measurable Goal or Performance Standard Utilized	Complete and update storm sewer system maps for each MS4 illustrating storm sewer system components including outfall locations, inlets, open channels, subsurface conduits/pipes, dry wells, manholes, and other similar discrete conveyances utilizing online interactive GIS mapping tool. Include mapping elements for receiving waters and high priority areas/outfalls. Complete maps by December 31,2023, and update annually thereafter. Annually review agreements with cities and counties to determine changes to MDT's storm sewer infrastructure responsibility. Provide any updates to agreements in the storm water responsibility table. Update MS4 boundary information as described in MDT's *Mapping Update Procedure* SOP. Collect new mapping data elements as described in MDT's *Mapping Update Procedure* SOP annually.
Quantitative Indicators Used and Results	MDT utilized three Consultant Firms in 2023 to collect data for storm drain infrastructure mapping. MDT 2023 MS4 boundaries Map was created 10/25/23. Currently using the 2022 MS4 Boundaries Map until the boundary changes officially go into effect. New mapping elements and infrastructure have been collected by consultants and data is being reviewed and expected to be published in 2024.
Impact on SWMP Effectiveness	Provides a tool for investigating illicit discharges, containing spills, and identifying high priority areas.

SWMP Activity or Component Name	High Priority Assessment BMP-IDDE-03	IDDE Investigation and Corrective Action Plan (CAP) BMP-IDDE-04
Minimum Control Measure Name (If Applicable)	IDDE High Priority Assessment	IDDE Investigative and Corrective Action Plan
General Permit Condition Item Number (If Applicable)	II.B.3	II.B.3
Brief Description of Planned SWMP Action Taken	Identify areas and outfalls that are most likely to contribute pollutants to the MS4.	Identifies processes that MDT uses to locate the source of an illicit discharge and select the appropriate corrective action.
Responsible Agency, Department, or Organization; and Person or Position	MDT - SEES	MDT - EESS, DEES
Measurable Goal or Performance Standard Utilized	MDT will identify high priority areas and outfalls in each MS4 as described in MDT's IDDE CAP. High Priority outfall designation will be completed by December 31, 2023. Update in accordance with MDT's IDDE CAP, which states the criteria for determining high priority outfalls is completed once per permit cycle except for review of dry weather screening for illicit discharges which is completed annually. Review statewide dry weather screening information and illicit discharge incident reports to identify whether there are newly identified high priority outfalls.	Implement procedures described in MDT's IDDE CAP. Update MDT's IDDE CAP annually.
Quantitative Indicators Used and Results	MDT IDDE CAP was reviewed, updated and Implemented in 2023 and published Jan 2024, High priority areas and outfalls were updated as part of the IDDE CAP update. Dry weather screenings of MS4 outfalls were reviewed and no illicit discharges were identified. No newly identified high priority outfalls were identified as result of 2023 dry weather screenings.	MDT updated the CAP in 2023 and published Jan 2024.
Impact on SWMP Effectiveness	Prioritizing outfalls allows for increased oversight in areas most likely to result in discharges that could cause or contribute to pollution of state waters.	Allows for consistent and timely responses to illicit discharge events.

SWMP Activity or Component Name	**Enforcement Response Plan (ERP)** **BMP-IDDE-05**
Minimum Control Measure Name (If Applicable)	IDDE
General Permit Condition Item Number (If Applicable)	II.B.3
Brief Description of Planned SWMP Action Taken	Identifies policies and procedures for MDT to exert authority over MS4 users.
Responsible Agency, Department, or Organization; and Person or Position	MDT - DEES, EESS
Measurable Goal or Performance Standard Utilized	Implement procedures described in MDT's ERP. Review written policies and procedures identified in MDT's ERP and update once every 5 years (i.e., permit cycle).
Quantitative Indicators Used and Results	For each of the five spills or discharges identified in 2023, none were identified as illicit discharges. The appropriate agencies were notified, and corrective actions were addressed in accordance with MDT's ERP. The ERP was last updated in 2021 and will be updated by 2026.
Impact on SWMP Effectiveness	Allows for consistent and timely enforcement to eliminate prohibited discharges.

SWMP Activity or Component Name	Dry Weather Screening BMP-IDDE-06
Minimum Control Measure Name (If Applicable)	IDDE
General Permit Condition Item Number (If Applicable)	II.B.3
Brief Description of Planned SWMP Action Taken	Inspect outfalls during dry weather to detect illicit discharges and connections into the MS4.
Responsible Agency, Department, or Organization; and Person or Position	MDT - DEES
Measurable Goal or Performance Standard Utilized	The DEES is responsible for conducting dry weather screening at each high priority outfall annually and screening each outfall at least once every five years (e.g., 20% of outfalls each year).
Quantitative Indicators Used and Results	The IDDE protocols are available on the MDT intranet site. In 2022, MDT updated the list of outfalls for each MS4 from information obtained in 2021. The High Priority List compiled in 2022, was used in 2023 dry weather screening. The 2023 dry weather screening campaign evaluated 100% of the high priority outfalls and approximately 66% of all currently listed MDT outfalls. The number of outfalls screened in 2023 by MS4 area are as follows: Billings/Yellowstone County: 13 of 23 (57%) Bozeman: 8 of 14 (57%) Great Falls: 2 of 2 (100%) Kalispell: 10 of 10 (100%) Butte: 10 of 21 (48%) Missoula: 24 of 24 (100%) Helena: 1 of 9 (11%)
Impact on SWMP Effectiveness	Proactive measure to identify illicit or illegal discharges that need to be eliminated.

SWMP Activity or Component Name	**IDDE Field Guidance** **BMP-IDDE-07**
Minimum Control Measure Name (If Applicable)	IDDE
General Permit Condition Item Number (If Applicable)	II.B.3
Brief Description of Planned SWMP Action Taken	Develop guidance to assist MDT personnel with detection and elimination of illicit discharges into the MS4.
Responsible Agency, Department, or Organization; and Person or Position	MDT - SEES
Measurable Goal or Performance Standard Utilized	MDT will develop an IDDE Field Guide that is designed to assist MDT personnel with detection and elimination of illicit discharges into the MS4. Develop field guidance by December 31, 2023.
Quantitative Indicators Used and Results	The MDT IDDE Field Guides were printed in August 29, 2023 and distributed by the DEES following the Field Services Quarterly meeting held October 11, 2023.
Impact on SWMP Effectiveness	Engages additional MDT personnel in identifying illicit discharges.

SWMP Activity or Component Name	Storm Water Control Contract Provisions BMP-CONST-01
Minimum Control Measure Name (If Applicable)	Construction Site Runoff Control
General Permit Condition Item Number (If Applicable)	II.B.4
Brief Description of Planned SWMP Action Taken	MDT will use contractual agreements to ensure that projects are constructed in a manner that complies with federal, tribal, state, and local regulations.
Responsible Agency, Department, or Organization; and Person or Position	MDT - EESS, FSE, PDEs
Measurable Goal or Performance Standard Utilized	Update and maintain standard special provisions for Storm Water Permitting Requirements Under the MPDES and Protection of Storm Water Drainage System and compliance with Local Permit Requirements. Update MDT's *Erosion and Sediment Control BMP Manual* as needed to address new or changed regulatory requirements and/or BMP specifications. Ensure all projects let in MS4s contain the standard special provisions as outlined in MDT's *Plans, Specifications, and Estimates (PS&E) Review Guidance for Projects Located in MS4s* SOP. Track all projects let in each MS4 and verify that required special provisions are included in contract documents.
Quantitative Indicators Used and Results	Storm Water Permitting Requirements Under the MPDES was last updated 3/16/2022. and Protection of Storm Water Drainage System and compliance with Local Permit Requirements was last updated 09/09/2021. MDT's *Erosion and Sediment Control BMP Manual* was last updated Dec 2016. 13 projects within MS4 boundaries were awarded for construction in 2023. 12 of the contracts awarded for construction were reviewed and included the STORM WATER PERMITTING REQUIREMENTS UNDER THE MONTANA POLLUTANT DISCHARGE ELIMINATION SYSTEM (MPDES) [208] (REV 3-16-17) special provision and all 13 received the MS4 Guidance and MPDES special provisions in contract documents. Awarded 12/19/2023, the Still Water River North NH 5-3(161)18 Project initially did not have the MS4 provision. The provision will be added via change order before construction activities commence, spring 2024.
Impact on SWMP Effectiveness	Inclusion of storm water related provisions into contract packages allows for contract enforcement by MDT.

SWMP Activity or Component Name	**Storm water Management Plan Review Checklist** **BMP-CONST-02**
Minimum Control Measure Name (If Applicable)	Construction Site Runoff Control
General Permit Condition Item Number (If Applicable)	II.B.4
Brief Description of Planned SWMP Action Taken	MDT will utilize a storm water management plan review checklist to confirm completeness of the CGP SWPPP packages prepared by contractors.
Responsible Agency, Department, or Organization; and Person or Position	MDT - FSE, DEES
Measurable Goal or Performance Standard Utilized	Develop a storm water management plan review checklist that documents technology based effluent limitation requirements specified in the most current MPDES CGP. This checklist will be used to confirm completeness of the CGP SWPPP packages prepared by contractors. Complete checklist by December 31, 2023. Beginning January 1, 2024, for projects within MS4s that require MPDES CGP authorization, utilize a construction storm water management plan review checklist to confirm completeness of the CGP SWPPP packages prepared by contractors. Report projects let in each MS4 that require MDPES CGP authorization, date the checklist is completed and any findings in Annual Review after January 1, 2024.
Quantitative Indicators Used and Results	A Construction Storm Water Management Plan review checklist was developed and completed 12/21/2023. Every project let within each MS4 that requires a CGP SWPPP will be entered into the review checklist and will be in the Annual Review starting Jan 1st,2024.
Impact on SWMP Effectiveness	Ensures consistent review of storm water management plans and compliance with regulatory requirements to the maximum extent of contractual agreement.

SWMP Activity or Component Name	Environmental Construction Oversight Inspections BMP-CONST-03
Minimum Control Measure Name (If Applicable)	Construction Site Runoff Control
General Permit Condition Item Number (If Applicable)	II.B.4
Brief Description of Planned SWMP Action Taken	MDT environmental and construction personnel inspect features as they are being constructed to ensure that they are constructed according to the contract documents and to ensure compliance with federal, tribal, state, and local laws.
Responsible Agency, Department, or Organization; and Person or Position	MDT - FSE, DEES, EPM and Construction Crews
Measurable Goal or Performance Standard Utilized	For MDT-administered construction projects, the EPM and/or MDT construction crew will inspect all BMPs bi-weekly and document findings in BMP Inspection Report. This information is tracked in AASHTOWARE and a periodic audit of records in database is performed. Update MDT's *MS4 Construction and Post- Construction DEES Inspection Procedure* SOP and environmental construction oversight inspection checklist as needed to address new or changed regulatory requirements. Complete environmental construction oversight inspections in accordance with MDT's *MS4 Construction and Post Construction DEES Inspection Procedure* SOP. Document findings using Environmental Construction Inspection form.
Quantitative Indicators Used and Results	In 2023 MDT construction crews completed BMP inspection reports that were entered and tracked in AASHTOWARE. DEES performed periodic audits of construction bmp inspection reports. Updates to MDT's *MS4 Construction and Post- Construction DEES Inspection Procedure* SOP to better align with the 2022 MS4 General Permit were initiated in 2023 and are expected to be complete in 2024. The DEES inspected MDT projects within each MS4 in accordance with the February 2016 *MS4 Construction and Post-Construction DEES Inspection Procedures*. Targeted inspection frequencies are based on risk to water quality. The number of DEES' construction oversight inspections that occurred in each MS4 area during 2023 are as follows: Billings/Yellowstone County: 26 Bozeman 19 Butte:4 Great Falls:1 Helena: 0 Kalispell:17 Missoula: 28 The Environmental Construction Inspection form was used to document these inspections. Construction inspections are tracked in an excel spreadsheet
Impact on SWMP Effectiveness	Ensures construction storm water management controls are installed, operated, and maintained as designed.

SWMP Activity or Component Name	**ERP Enforcement Response Plan** **BMP-CONST-04**
Minimum Control Measure Name (If Applicable)	Construction Site Runoff Control
General Permit Condition Item Number (If Applicable)	II.B.4
Brief Description of Planned SWMP Action Taken	Identifies policies and procedures for MDT to exert authority over MDT contractors.
Responsible Agency, Department, or Organization; and Person or Position	MDT - EESS, DEES
Measurable Goal or Performance Standard Utilized	MDT will implement procedures described in MDT's ERP. The written policies and procedures identified in MDT's ERP will be reviewed and updated once every 5 years (i.e., permit cycle).
Quantitative Indicators Used and Results	MDT ERP was not updated in 2023 and is due to be updated by 2026.
Impact on SWMP Effectiveness	Allows for consistent and timely enforcement to address identified deficiencies.

SWMP Activity or Component Name	**Final Walk-Through** **BMP-CONST-05**
Minimum Control Measure Name (If Applicable)	Construction Site Runoff Control
General Permit Condition Item Number (If Applicable)	II.B.4
Brief Description of Planned SWMP Action Taken	During the project finalization process, conduct a final MPDES walk-through for projects that require MPDES CGP coverage. Ensure BMPs are installed and functioning properly. For sites that have not yet reached final stabilization, transfer CGP coverage from contractor to MDT maintenance or a local entity.
Responsible Agency, Department, or Organization; and Person or Position	MDT - DEES
Measurable Goal or Performance Standard Utilized	For projects that require MPDES CGP authorization, the DEES will conduct a final walk-through inspection in accordance with MDT's MS4 *Construction and Post-Construction DEES Inspection Procedure* SOP. Findings will be documented using the Preliminary and Final MPDES/NPDES Permit Walk-through forms, or with MPDES/NPDES Final Stabilization Inspection form for projects where CGP termination is proposed.
Quantitative Indicators Used and Results	In 2023, one project permit within MDT's MS4 boundaries was transferred. As a result, in 2023 the DEES performed 1 final walkthrough prior to transferring permit responsibilities from the contractor to MDT or local entity. Billings - 0 Butte – 0 Bozeman - 1 Great Falls – 0 Helena - 0 Missoula –0 Kalispell – 0
Impact on SWMP Effectiveness	Once physical work at a construction site is concluded, the contractor is no longer in operational control and CGP coverage is transferred to the appropriate entity. During this walk-through, MDT may direct the contractor to remove unnecessary temporary BMPs, replace temporary BMPs with permanent or long-term BMPs, provide additional temporary or permanent BMPs or perform BMP maintenance. Once the on-site conditions are acceptable and there are no unresolved violations for the site, CGP coverage is transferred.

SWMP Activity or Component Name	Program Evaluation BMP-CONST-06
Minimum Control Measure Name (If Applicable)	Construction Site Runoff Control
General Permit Condition Item Number (If Applicable)	II.B.4
Brief Description of Planned SWMP Action Taken	Discuss and solicit feedback on storm water-related issues and suggested program improvements.
Responsible Agency, Department, or Organization; and Person or Position	MDT - DEES, SEES
Measurable Goal or Performance Standard Utilized	DEES to attend at least one MDT District EPM meeting per year to discuss storm water-related issues and solicit feedback using SWMP feedback form(s) and/or through meeting summary. SEES to review feedback received and determine if there are topics that need to be discussed further with appropriate storm water program staff and whether changes to the SWMP are recommended.
Quantitative Indicators Used and Results	The DEES attended their respective district EPM meetings on the following dates and presented storm water information: • Missoula District (Missoula, Kalispell MS4s) 1/10/2023,2/15/2023. 12 feedback responses received from 2/15/23 meeting, no SWMP changes recommended. • Great Falls (Great Falls, Helena MS4s) 10/16/2023 No feedback received, no SWMP changes recommended. • Butte District (Bozeman, Butte MS4s) – 8/24/2023. No feedback received, no SWMP changes recommended. • Billings District (Billings/Yellowstone County MS4) – 10/5/2023. No feedback received, no SWMP changes recommended.
Impact on SWMP Effectiveness	Identifies issues and allows for improvement of the SWMP.

SWMP Activity or Component Name	**Construction Site Storm Water Management Public Input** **BMP-CONST-07**
Minimum Control Measure Name (If Applicable)	Construction Site Runoff Control
General Permit Condition Item Number (If Applicable)	II.B.4
Brief Description of Planned SWMP Action Taken	Address storm water complaints identified by the public via MDT's website, social media sites, and/or phone calls.
Responsible Agency, Department, or Organization; and Person or Position	MDT - EPM, DEES
Measurable Goal or Performance Standard Utilized	Address storm water complaints identified by the public via MDT's website and/or phone calls. Enlist assistance from DEES to resolve. When requested by EPM, conduct an environmental construction oversight inspection within 14 days of the complaint. Findings will be documented using Environmental Construction Inspection form. These goals to be implemented by December 31, 2023.
Quantitative Indicators Used and Results	MDT's website was updated in 2023 and includes the ability to report complaints. No complaints were made by the public through MDT's website, social media sites and/or phone calls relating to MS4 Storm water, in 2023.
Impact on SWMP Effectiveness	Allows consideration of public input when received and provides timeframe to resolve identified issues.

SWMP Activity or Component Name	**Construction Site Personnel Training** **BMP-CONST-08**
Minimum Control Measure Name (If Applicable)	Construction Site Runoff Control
General Permit Condition Item Number (If Applicable)	II.B.4
Brief Description of Planned SWMP Action Taken	Train MDT personnel in the selection, implementation, inspection, and maintenance of storm water BMPs.
Responsible Agency, Department, or Organization; and Person or Position	MDT - DEES/SEES
Measurable Goal or Performance Standard Utilized	Conduct routine construction site SWPPP training in accordance with **Section 2.2.2** of the MDT SWMP document. DEES to conduct annual training event at district level during EPM meetings and section meetings for maintenance personnel.
Quantitative Indicators Used and Results	MDT's new "MDT Classroom" for MDT maintenance personnel went live in November 2019. 33 maintenance personnel and 28 construction personnel participated in the online SWPPP training in 2023. Additionally, 8 Environmental Employees attended BMP 301 training in 2023. The DEES provided training at MDT maintenance staff meetings on various storm water topics including environmental permitting & MS4, IDDE, erosion control and BMPs, the new online SWPPP Administrator training, BMP repairs, and spill prevention. The Maintenance staff meeting training events were as follows: • Billings/Yellowstone County: Maint 4/07/2023 Const EPM 10/5/2023 • Butte/Bozeman/Helena: Maint 4/13/2023; 10/18/2023 Const EPM 8/24/2023 • Missoula: Maint 10/18/2023 Const. EPM 1/10/2023, • Great Falls: Maint 10/16/2023 Const EPM 10/16/2023 • Kalispell: Maint 10/19/2023; Const. EPM 2/15/2023
Impact on SWMP Effectiveness	Ensure staff are qualified to review storm water construction BMPs and understand inspection protocols and enforcement responses.

SWMP Activity or Component Name	**Identify Regulated Projects** **BMP-POST-01**
Minimum Control Measure Name (If Applicable)	Post-Construction Site Storm Water Management
General Permit Condition Item Number (If Applicable)	II.B.5
Brief Description of Planned SWMP Action Taken	Review projects to determine if the project is in an MS4, whether the project is considered a new or redevelopment project, and whether the area of disturbance is expected to be over the applicable regulatory threshold(s).
Responsible Agency, Department, or Organization; and Person or Position	MDT - PDEs
Measurable Goal or Performance Standard Utilized	PDEs will review 100% of MDT administered construction projects to determine if the project is in an MS4, whether the project is considered a new or redevelopment project, and whether the area of disturbance is expected to be over the applicable regulatory threshold(s). The PDEs will document this determination in the project's environmental document (e.g., categorical exclusion, environmental assessment, or environmental impact statement.) PDEs will review 100% of the encroachment and approach permit application environmental checklists for projects located within an MS4. The PDEs will provide appropriate MS4-related information to be included in the permit issuance correspondence.
Quantitative Indicators Used and Results	In 2022 MDT implemented a new utility encroachment permitting system named UPAS, that documents the review fully within an online interface. Therefore, no email correspondence outside of system is generated. MDT used a spreadsheet which includes MS4 specific information to track these UPAS reviews. . In 2023, MDT reviewed 100% of the encroachment and approach permit application environmental checklists for projects located within MS4's. In 2023 the PDEs reviewed: • 33 encroachment and approach permits within MDT MS4 areas through the SIAP process. (Tracked via REM Assignment spreadsheet) • 94 UPAS encroachment permits (Tracked via REM Assignment spreadsheet)
Impact on SWMP Effectiveness	Identifies projects for which designers should incorporate storm water management controls that reflect or improve upon predevelopment hydrology. While MDT does not have the authority to write ordinances or requirements for storm water design criteria on non-MDT proposed projects, MDT can and does enforce MDT standards on MDT projects.

SWMP Activity or Component Name	PESC Design BMP-POST-02
Minimum Control Measure Name (If Applicable)	Post-Construction Site Storm Water Management
General Permit Condition Item Number (If Applicable)	II.B.5
Brief Description of Planned SWMP Action Taken	Describe procedures and methods used to address long-term erosion associated with highway construction and the resultant highway-related storm water runoff.
Responsible Agency, Department, or Organization; and Person or Position	MDT - Road Designers, District Hydraulics Engineer, PDEs, Hydraulics Engineer
Measurable Goal or Performance Standard Utilized	Evaluate projects in accordance with MDT's *PESC Design Guidelines.* Recommendations to be documented in milestone reports. Assist in selection of appropriate PESC treatment for various types of erosion. In coordination with Road Design, develop plans and specifications for selected PESC. Review projects throughout project development and ensure PESC considered and incorporated into projects as appropriate. In coordination with MDT Environmental Engineering Section, update MDT's *PESC Design Guidelines* as needed to address new or changed regulatory requirements and/or design guidelines.
Quantitative Indicators Used and Results	MDT's PESC Manual was updated in 2018. To ensure 100% of the plans within Small MS4s consider incorporation of PESC measures, MDT's design milestone report templates have been modified to include a specific section documenting PESC measures considered during design. These milestone reports are required to be completed for MDT federal aid projects.
Impact on SWMP Effectiveness	Provides information to designers on the selection of appropriate PESC measures to be included in MDT plans packages.

SWMP Activity or Component Name	**Low Impact Development (LID) Practice Analysis** **BMP-POST-03**
Minimum Control Measure Name (If Applicable)	Post-Construction Site Storm Water Management
General Permit Condition Item Number (If Applicable)	II.B.5
Brief Description of Planned SWMP Action Taken	Evaluate LID techniques for MDT construction projects and at its facilities within the MS4 areas when upgrades to the facilities are implemented and new or redevelopment takes place.
Responsible Agency, Department, or Organization; and Person or Position	MDT - EESS, PDEs, District Hydraulics Engineers
Measurable Goal or Performance Standard Utilized	In coordination with MDT Hydraulics Section, the EESS will update and maintain LID Practice Analysis form as needed to address new or changed regulatory requirements and changes to project development procedures. Identify in environmental document projects that require an LID Practice Analysis and work with District Hydraulics Engineer to document conclusions. For 100% of identified projects, District Hydraulics engineers will complete the LID Practice Analysis form to document how post-construction runoff from the first 0.5 inches of rainfall is being managed.
Quantitative Indicators Used and Results	A new LID form, drafted in 2022 was implemented and updated May 2023. 13 of 13 (100%) MDT design projects within MS4 areas at various levels of project development received LID analysis review in 2023.
Impact on SWMP Effectiveness	Ensures new and redevelopment projects reflect or improve upon the predevelopment hydrology through infiltration, evapotranspiration, and capture for reuse.

SWMP Activity or Component Name	Offsite Treatment Criteria and Formal Review/Approval Process BMP-POST-04
Minimum Control Measure Name (If Applicable)	Post-Construction Site Storm Water Management
General Permit Condition Item Number (If Applicable)	II.B.5
Brief Description of Planned SWMP Action Taken	Develop and apply criteria for determining when offsite treatment may be allowed.
Responsible Agency, Department, or Organization; and Person or Position	MDT - EESS, Hydraulics Engineer, SEES
Measurable Goal or Performance Standard Utilized	Develop criteria for determining when offsite treatment will be allowed on MDT projects and a formal review and approval process for these determinations. Complete criteria and process by December 31, 2023. Starting January 1, 2024, maintain an inventory of regulated projects that utilize off-site treatment for post-construction storm water runoff. Annual review starting January 1,2025.
Quantitative Indicators Used and Results	MDT developed a draft process in 2023. MDT will finalize the offsite treatment criteria process and it will be implemented in 2024. In 2023, existing post-construction storm water management controls were identified during the MS4 stormwater infrastructure mapping updates. Additionally, the LID form was structured to identify new post-construction management controls. A complete inventory of these controls will be completed in 2024 with updates to the MS4 tracking spreadsheet.
Impact on SWMP Effectiveness	Provides preference for on-site treatment except for instances of technical or logistical infeasibility.

SWMP Activity or Component Name	**Post-Construction Storm Water Control Inspections BMP-POST-05**
Minimum Control Measure Name (If Applicable)	Post-Construction Site Storm Water Management
General Permit Condition Item Number (If Applicable)	II.B.5
Brief Description of Planned SWMP Action Taken	Consistently and thoroughly inspect PESC features.
Responsible Agency, Department, or Organization; and Person or Position	MDT - EPM and Construction Crews, Maintenance Section Personnel, DEES
Measurable Goal or Performance Standard Utilized	For MDT-administered construction projects where post-construction storm water controls are installed, the EPM and/or MDT construction crew will inspect all BMPs bi-weekly and document findings in BMP Inspection Report. Track in AASHTOWARE and perform periodic audit of results in the database. For projects where MDT is authorized to discharge under the MPDES CGP, maintenance section personnel will inspect post-construction storm water controls (i.e., permanent erosion and sediment controls) in accordance with permit requirements. Inspections will be documented using DEQ's self-inspection report form. Perform periodic audit of maintenance SWPPP documents and document compliance. For other post-construction storm water control inspections, maintenance section personnel will conduct routine inspections in accordance with agreements, MDT's Maintenance Manual, and site-specific O&M Manuals, as applicable. Findings will be documented in Maintenance Management System (MMS). Track in MMS and perform periodic audit of records in database. For projects that have reached final stabilization and termination under the CGP is proposed, the DEES will inspect the site and document findings with MPDES/NPDES Final Stabilization Inspection form. For MDT authorizations, the DEES will also complete a Notice of Termination. Record project name, MDPES CGP authorization number, date(s) inspected, final stabilization determination, date NOT issued.
Quantitative Indicators Used and Results	In 2023 two projects within the Billings MS4 included post construction storm water controls. Construction crews provided BMP reports that were uploaded and tracked on AASHTOWARE. DEES performed periodic audits of inspections. MDT DEES continued to perform periodic audits of Maintenance SWPPP Documents and document compliance in 2023. Making sure that monthly inspections were being performed for existing MDT held MPDES SWPPP permits. MDT's MS4 infrastructure mapping will be finalized in 2024. Mapping will include all known post construction BMP's, and at that time the MMS system will be queried to find records of inspections. • Butte MS4 - 1 Project reached final stabilization documented in final inspection form and was terminated in 2023. • Billings MS4- 1 Project reached final stabilization documented in final inspection form and was terminated in 2023.
Impact on SWMP Effectiveness	Ensures post-construction storm water management controls are installed, operated, and maintained as designed.

SWMP Activity or Component Name	**Federal Re-Vegetation Management Program** **BMP-POST-06**
Minimum Control Measure Name (If Applicable)	Post-Construction Site Storm Water Management
General Permit Condition Item Number (If Applicable)	II.B.5
Brief Description of Planned SWMP Action Taken	Provide additional revegetation efforts when necessary to reach final stabilization for eligible projects.
Responsible Agency, Department, or Organization; and Person or Position	MDT - SEES, Reclamation Specialist
Measurable Goal or Performance Standard Utilized	Annually, the SEES will identify projects with open CGP permits held by MDT for more than two growing seasons. The SEES will provide the list to the FSE and Reclamation Specialist for consideration of project nomination under the ESB-administered federal re-vegetation program. Track identified project name, MDPES CGP authorization number, and recommended improvement(s). For projects nominated within MS4s, the reclamation specialist will determine if improvements to storm water run-off control and infiltration can be improved with further re-vegetation using the Federal Revegetation Management Program. If improvements are identified, the reclamation specialist will develop and let a contract under this program. Report Dates(s) and location(s) of projects let under Federal Revegetation Management Program in an MS4for Annual Review.
Quantitative Indicators Used and Results	In 2023 no new projects were identified for consideration for re-vegetation funding within MS4 areas. The following project previously identified in 2022, was completed within the Butte MS4, and required vegetation improvements. Using the Federal Revegetation Management Program, boundary and revegetation funds were used. RARUS-SILVERBOW CREEK STRUCTURES Located within Butte MS4 on I-15/I-90 beginning at RP 124.1 and proceeding east to RP 125.3 Awarded 10/28/22.
Impact on SWMP Effectiveness	Prioritizes use of federal re-vegetation funds for projects located in MS4s.

SWMP Activity or Component Name	**ERP** **BMP-POST-07**
Minimum Control Measure Name (If Applicable)	Post-Construction Site Storm Water Management
General Permit Condition Item Number (If Applicable)	II.B.5
Brief Description of Planned SWMP Action Taken	Identifies policies and procedures for MDT to exert authority over MDT contractors.
Responsible Agency, Department, or Organization; and Person or Position	MDT - EESS, DEES
Measurable Goal or Performance Standard Utilized	Implement procedures described in MDT's ERP. Additionally, review written policies and procedures identified in MDT's ERP and update as needed. Update once every 5 years (i.e., permit cycle).
Quantitative Indicators Used and Results	No updates to the ERP were made in 2023. Updates will be made by 2026.
Impact on SWMP Effectiveness	Allows for consistent and timely enforcement to address identified deficiencies.

SWMP Activity or Component Name	**Post-Construction Storm Water Control Inventory** **BMP-POST-08**
Minimum Control Measure Name (If Applicable)	Post-Construction Site Storm Water Management
General Permit Condition Item Number (If Applicable)	II.B.5
Brief Description of Planned SWMP Action Taken	Maintain an inventory of post-construction storm water management controls.
Responsible Agency, Department, or Organization; and Person or Position	MDT - SEES
Measurable Goal or Performance Standard Utilized	Beginning January 1, 2023, develop and maintain an inventory of post-construction storm water controls utilizing information contained in milestone reports, hydraulics reports, LID Practice Analysis form, and construction plans and specifications. Location, type of control, owner/operator, maintenance responsibility, O&M Manual, and installation date (if known). Include in Annual Review starting January 1,2024.
Quantitative Indicators Used and Results	In 2023, existing post-construction storm water management controls were identified during the MS4 stormwater infrastructure mapping updates. Additionally, the LID form was structured to identify new post-construction management controls. A complete inventory of these controls will be completed in 2024 with updates to the MS4 tracking spreadsheet.
Impact on SWMP Effectiveness	Allows for effective asset management to ensure routine inspections and maintenance actions of post-construction storm water control occurs.

SWMP Activity or Component Name	Inspection Prioritization BMP-POST-09
Minimum Control Measure Name (If Applicable)	Post-Construction Site Storm Water Management
General Permit Condition Item Number (If Applicable)	II.B.5
Brief Description of Planned SWMP Action Taken	Utilize a protocol to determine priority and minimum inspection frequency of post construction storm water management controls.
Responsible Agency, Department, or Organization; and Person or Position	MDT - FSE, Maintenance Division Operations Manager, SEES, DEES
Measurable Goal or Performance Standard Utilized	In coordination with MDT Maintenance Division, develop a protocol to determine priority and minimum inspection frequency for post-construction storm water controls. Priority must be based on potential water quality impacts, with consideration for the operation and maintenance needs, proximity to waterbodies, drainage area treated, land use type, and location within an impaired watershed. Complete by December 31, 2023. In coordination with MDT Maintenance Division, develop a post-construction storm water control inspection checklist for incorporation into MMS. Complete by December 31, 2023. With financial support from ESB, incorporate additional fields into MMS to capture post-construction storm water control inspection information. Communicate inspection requirements to maintenance personnel. Complete by December 31, 2024. Update post-construction storm water control inventory with priority ranking and minimum inspection frequency. Report priority ranking and inspection frequency in Annual Review starting January 1, 2025. Communicate with maintenance section personnel the post-construction storm water control inspection frequency and assist with inspections as requested. Track dates of communication and assistance, maintenance personnel involved and perform periodic audit of records in MMS.
Quantitative Indicators Used and Results	A draft priority and minimum inspection protocol for post-construction storm water controls was completed 12/30/22. Additional discussions with maintenance will occur in 2024 before finalizing this protocol. A post-construction control inspection checklist was drafted in 2023 and is expected to be finalized in 2024 after coordinating with maintenance division. A complete inventory of these controls with priority rankings and inspection frequencies will be completed in 2024 and inventoried in the MS4 tracking spreadsheet. Priority rankings and inspection frequencies will be tracked and will be reported starting Jan 1, 2025.
Impact on SWMP Effectiveness	Prioritizes inspections based on potential water quality impacts.

SWMP Activity or	Program Evaluation

Component Name	**BMP-POST-10**
Minimum Control Measure Name (If Applicable)	Post-Construction Site Storm Water Management
General Permit Condition Item Number (If Applicable)	II.B.5
Brief Description of Planned SWMP Action Taken	Discuss and solicit feedback on storm water-related issues and suggested program improvements.
Responsible Agency, Department, or Organization; and Person or Position	MDT - DEES, SEES
Measurable Goal or Performance Standard Utilized	DEES to attend at least one MDT Maintenance Division section person meeting per year to discuss storm water-related issues and solicit feedback on suggested program improvements. Document feedback using SWMP feedback form(s) and/or through meeting summary. SEES to annually review feedback and determine if there are topics that need to be discussed further with appropriate storm water program staff and whether changes to the SWMP are recommended.
Quantitative Indicators Used and Results	Billings Division- Billings 4/7/2023 • Discussed seeding, emergency permitting and storm water BMPs. 10 Participants No feedback received required changes to SWMP. Bozeman Division 4/13/2023 • MDT SWPPP Administrator for Maintenance Personnel, MS4 FPPP Training Video for Maintenance Personnel, PAR Plan for Maintenance Projects, SWPPP Terminations, Stream Permitting . 17 Participants. No feedback received. No required changes to SWMP. Butte and Helena Divisions 10/18/2023 • Stream permitting & Lessons Learned from Maud S Canyon Non-compliance resulting in After-the-Fact Permitting. 15 Participants. No feedback received. No changes required to SWMP Great Falls Division 10/16/2023 • Discussed emergency response, IDDE, Maint. Facilities inspections/reporting, SWPPP admin. training/inspections.. 3 Participants. No feedback received. No required changes to SWMP. Missoula Division 10/18/2023 • Maintain and Sustain Powerpoint Presentation. 42 participants. No feedback received. NO required changes to SWMP. Kalispell Division 10/25/2022 • Maintain and Sustain Powerpoint Presentation.35 participants. No feedback received. No required changes to SWMP.
Impact on SWMP Effectiveness	Identifies issues and allows for improvement of the SWMP.

SWMP Activity or Component Name	**Post-Construction Site Personnel Training** **BMP-POST-11**
Minimum Control Measure Name (If Applicable)	Post-Construction Site Storm Water Management
General Permit Condition Item Number (If Applicable)	II.B.5
Brief Description of Planned SWMP Action Taken	Train MDT personnel in the selection, implementation, inspection, and maintenance of storm water BMPs.
Responsible Agency, Department, or Organization; and Person or Position	MDT - EESS, Highways Engineer
Measurable Goal or Performance Standard Utilized	MDT will conduct routine post-construction storm water training to educate plan reviewers and inspectors on PESC and LID design, construction, and maintenance requirements in accordance with **Section 2.2.3** of MDTs SWMP document. To be completed once every 5 years (i.e., permit cycle).
Quantitative Indicators Used and Results	On June 16, 2022, a comprehensive Storm Water Management Training class was held which reviewed the updated MDT MS4 management program. 14 attendees present. On February 16,2023 MDT held an MS4 LID Process change training and offsite treatment approval process meeting. 25 MDT Environmental and Hydraulics staff attended. In 2023, 28 Construction Personnel and 33 Maintenance Personnel completed the online SWPPP Training.
Impact on SWMP Effectiveness	Ensure staff are qualified to review storm water postconstruction BMPs and understand inspection protocols and enforcement responses.

SWMP Activity or Component Name	MDT Facility and Activity Inventory BMP-PPGH-01
Minimum Control Measure Name (If Applicable)	Pollution Prevention / Good Housekeeping
General Permit Condition Item Number (If Applicable)	II.B.6
Brief Description of Planned SWMP Action Taken	Develop and maintain inventory of MDT-owned and operated facilities and activities.
Responsible Agency, Department, or Organization; and Person or Position	MDT - SEES
Measurable Goal or Performance Standard Utilized	Develop and maintain an inventory of MDT-owned or operated facilities and activities that have the potential to contribute contaminants to the MS4.
Quantitative Indicators Used and Results	A facilities inventory was created in 2022 with last update occurred February 22, 2023.
Impact on SWMP Effectiveness	Identify potential for MDT operations to contribute contaminants to the MS4.

SWMP Activity or Component Name	**MDT Facility and Activity Mapping** **BMP-PPGH-02**
Minimum Control Measure Name (If Applicable)	Pollution Prevention / Good Housekeeping
General Permit Condition Item Number (If Applicable)	II.B.6
Brief Description of Planned SWMP Action Taken	Add MDT facilities to MS4 maps.
Responsible Agency, Department, or Organization; and Person or Position	MDT - SEES, Geospatial Analyst
Measurable Goal or Performance Standard Utilized	Complete and update MS4 maps illustrating the location of each facility and activity identified in the MDT Facility and Activity Inventory. Complete maps by December 31, 2023, and update annually.
Quantitative Indicators Used and Results	Facility Data was collected for each MS4 facility in 2022 and mapping was completed in 2023.
Impact on SWMP Effectiveness	Completes mapping of storm sewer system and identifies areas of potential discharge from MDT facilities.

SWMP Activity or Component Name	**FPPPs and Spill Prevention, Controls, and Countermeasures (SPCCs)** **BMP-PPGH-03**
Minimum Control Measure Name (If Applicable)	Pollution Prevention / Good Housekeeping
General Permit Condition Item Number (If Applicable)	II.B.6
Brief Description of Planned SWMP Action Taken	Develop and implement FPPPs to identify facility-specific potential pollutant sources, associated BMPs, and inspection protocols. Incorporate SPCC plans into the FPPPs for facilities with a total aboveground oil storage capacity greater than 1,320 gallons.
Responsible Agency, Department, or Organization; and Person or Position	MDT - FSE, DEES, SEES, Maintenance Chief, FPPP Inspector
Measurable Goal or Performance Standard Utilized	Ensure each MDT facility located within an MS4 has a site-specific FPPP. If the facility also has an SPCC plan, ensure it is appended to the FPPP. Update in accordance with MDT's *FPPP Update and Training Procedure* SOP. Ensure FPPP is implemented and assign FPPP Inspector. Review FPPP and conduct monthly inspections of the facility. Complete FPPP Inspection Checklist monthly. Review monthly inspection forms and ensure corrective action(s) taken. Review inspection forms and confirm identified corrective actions have occurred. Maintain central repository of inspection and FPPP documents. Distribute documents in accordance with MDT's *FPPP Inspection Transmittal Procedure* SOP.
Quantitative Indicators Used and Results	100% of facilities were inspected each month. 100% of the time. Inspection forms were reviewed and maintained and distributed in accordance with MDT's FPPP Inspections Transmittal Procedure SOP. FPPP inspections were reviewed to identify issues and to ensure corrective actions were taken. FPPP Inspection checklist was completed on a Monthly basis.
Impact on SWMP Effectiveness	Prevents and reduces pollution contributions to the MS4 from MDT facilities.

SWMP Activity or Component Name	**Facility Storm Water Control Updates** **BMP-PPGH-04**
Minimum Control Measure Name (If Applicable)	Pollution Prevention / Good Housekeeping
General Permit Condition Item Number (If Applicable)	II.B.6
Brief Description of Planned SWMP Action Taken	Establishes funding prioritization for storm water control enhancements at existing MDT facilities.
Responsible Agency, Department, or Organization; and Person or Position	MDT - DEES, SEES, FSE, EESS, Facilities Bureau Chief
Measurable Goal or Performance Standard Utilized	DEES conduct an onsite review of each facility and complete the Annual FPPP Inspection Summary form in accordance with the *FPPP Update and Training Procedure* SOP. Identify recommended storm water control updates. SEES, FSE, EESS review each of the Annual FPPP Inspection Summary forms and prioritize funding for recommended storm water control updates. To be completed by April 1st annually. Annually meet to prioritize facility projects for funding that will benefit water quality in the MS4s (e.g., vehicle wash bays, secondary containment, salt/sand shed, handling and storage, etc.) and develop a schedule for implementation. ESB funding will be provided for facility projects that will be completed within the schedule. Meeting to be held by May 1st annually.
Quantitative Indicators Used and Results	FPPP Update and Training Procedures SOP was updated in June 2023. Annual Inspection summary forms were reviewed by the SEES and FSE in 2023 and a recommended priority list for funding storm water control updates was updated. Annual inspection reports for 2023 were completed and are on file. The following facility list was made within MDT's Environmental Services to prioritize funding for storm water control updates. However, no meeting was held with Maintenance in 2023. **High Priortiy #1 Billings - Main Facility** • Floor drains needed for equipment sheds. • Wash bay needed to be added. **High Priority #2 Helena - Maintenance Facility** • Construction of retention pond needed. Temporarily, controls need to be placed on the inlet. Straw wattles may be used for sediment. **High Priortiy #3 Helena - Aeronautics Division** • An asphalt speed bump and/or parking lot re-grading could be constructed across the site entrance to keep runon off the property. **High Priortity #4 Great Falls - 57th Street** • **Retention ponds need to be cleaned and/or constructed to hold more capacity. (Completed summer 2023)** • Secondary containment needs be added to brine tanks. **High Priortity #5 Butte Main Facility** • Secondary containment can be added to brine tanks. • Cover needed for oil tank ASTs. • Existing stockpile requires a covering or evaporation pond constructed. A meeting with Maintenance will be held before May 1, 2024, to discuss the 2023 Annual reports to review and prioritize the facility needs and discuss areas of improvement for the FPPP locations.
Impact on SWMP Effectiveness	Allows for installation of additional BMPs to prevent and reduce pollution contributions to the MS4 from MDT facilities.

SWMP Activity or Component Name	**Facility Storm Water Awareness Posters** **BMP-PPGH-05**
Minimum Control Measure Name (If Applicable)	Pollution Prevention / Good Housekeeping
General Permit Condition Item Number (If Applicable)	II.B.6
Brief Description of Planned SWMP Action Taken	Create storm water BMP poster for use at MDT maintenance facilities.
Responsible Agency, Department, or Organization; and Person or Position	MDT - Maintenance Staff
Measurable Goal or Performance Standard Utilized	Develop a poster for use at MDT facilities showing the various pollutants associated with MDT facilities and best practices to manage them. Complete and distribute poster by no later than December 31, 2023.
Quantitative Indicators Used and Results	A poster showing pollutants and management practices was developed, posted to MDT's internal website December 2023, and printed January 2024. Location and distribution numbers will be tracked and reported in 2024.
Impact on SWMP Effectiveness	Educates MDT personnel on various pollutants associated with MDT facilities and associated BMPs.

SWMP Activity or Component Name	**Field and Facility Personnel Training** **BMP-PPGH-06**
Minimum Control Measure Name (If Applicable)	Pollution Prevention / Good Housekeeping
General Permit Condition Item Number (If Applicable)	II.B.6
Brief Description of Planned SWMP Action Taken	Educate staff regarding storm water characteristics, water quality issues, and individual responsibilities regarding the implementation of the Statewide SWMP, FPPPs, SPCC plans, and associated SOPs.
Responsible Agency, Department, or Organization; and Person or Position	MDT - DEES, SEES
Measurable Goal or Performance Standard Utilized	Conduct site-specific FPPP training in accordance with MDT's *FPPP Update and Training Procedure* SOP and **Section 2.2.4** of MDTs SWMP document. To be completed every 3 years. Develop an on-line IDDE training program for use by MDT field personnel. Incorporate requirements described in **Section 2.2.4** of MDTs SWMP document. To be completed by December 31, 2024.
Quantitative Indicators Used and Results	MDT's site-specific FPPP training was completed at each MS4 area and the dates and locations are as follows. Kalispell FPPP training Tuesday, November 1, 2022 Missoula MS4 FPPP Training Wednesday, November 2, 2022 Billings MS4 FPPP Training Tuesday, October 25, 2022 Helena MS4 FPPP Training Thursday, October 20, 2022 Great Falls FPPP Training Monday, October 3, 2022 Bozeman MS4 FPPP Training Wednesday, October 26, 2022 Butte MS4 FPPP Training Wednesday, October 19, 2022 A scope for an online IDDE training program has been developed based on the requirements of Montana's April 2022 General Permit for Storm Water Discharges Associated with Small MS4s. As described in MDT's May 2022 Storm Water Management Program, the target audience for this training is MDT maintenance, construction, and environmental personnel. MDT plans to have an online IDDE training program completed by Dec 31,2024.
Impact on SWMP Effectiveness	Ensures staff understand storm water impacts associated with various maintenance activities and controls that can be implemented.

SWMP Activity or Component Name	**Maintenance Manual and SOPs** **BMP-PPGH-07**
Minimum Control Measure Name (If Applicable)	Pollution Prevention / Good Housekeeping
General Permit Condition Item Number (If Applicable)	II.B.6
Brief Description of Planned SWMP Action Taken	Review and update MDT's Maintenance Manual and SOPs to address new or changed regulatory requirements and/or design guidelines.
Responsible Agency, Department, or Organization; and Person or Position	MDT - Maintenance Division Operations Manager, EESS
Measurable Goal or Performance Standard Utilized	In coordination with MDT Environmental Engineering Section, update MDT's *Maintenance Operations and Procedures Manual* as needed to address new or changed regulatory requirements and/or design guidelines. EESS to develop written SOPs and/or site-specific O&M Manuals when needed to address new or changed regulatory requirements and/or design guidelines. Update required once every 5 years (i.e., permit cycle).
Quantitative Indicators Used and Results	In 2022 a review was performed to identify needed updates to the MDT Maintenance Operations and Procedures Manual as well as to develop SOPs and site-specific O&M Manuals.
Impact on SWMP Effectiveness	Ensure MDT guidance and SOPs are up-to-date and reflect latest recommendations for storm water protection.

SWMP Activity or Component Name	**Street Sweeping** **BMP-PPGH-08**
Minimum Control Measure Name (If Applicable)	Pollution Prevention / Good Housekeeping
General Permit Condition Item Number (If Applicable)	II.B.6
Brief Description of Planned SWMP Action Taken	Implement a street sweeping program that encompasses the streets and roadways, maintenance yards, and parking areas that MDT is responsible for maintaining. The street sweeping frequency depends on need and travel volumes. Sweepers also respond to certain types of spills that require clean-up.
Responsible Agency, Department, or Organization; and Person or Position	MDT - Maintenance Personnel
Measurable Goal or Performance Standard Utilized	Sweep 100% of the facilities and MDT maintained roads within small MS4s a minimum of one time each year. Recycle sanding materials whenever feasible. Track miles swept, year and location.
Quantitative Indicators Used and Results	MDT swept 100% of the MDT facilities and MDT maintained roads within the Small MS4s a minimum of once in 2023. The breakdown obtained from MDT Maintenance Division for miles swept in each MS4 is as follows: Missoula*: 544 miles Kalispell: 257 miles Butte: 183 miles Bozeman*: 29 miles Great Falls: 252 miles Helena: 802 miles Billings/Yellowstone County:569 miles **Note: MDT has contracted with the City of Missoula for sweeping on Broadway (Reserve to E. Missoula), Reserve, Higgins, 39th, and Brooks. In Bozeman, MDT has an agreement with the City of Bozeman for the City to do most of the sweeping.*
Impact on SWMP Effectiveness	Prevents and reduces pollution contributions to the MS4 associated with MDT's winter maintenance operations.

SWMP Activity or Component Name	**Winter Maintenance Program** **BMP-PPGH-09**
Minimum Control Measure Name (If Applicable)	Pollution Prevention / Good Housekeeping
General Permit Condition Item Number (If Applicable)	II.B.6
Brief Description of Planned SWMP Action Taken	MDT will evaluate the Winter Maintenance Program for feasible ways to transition to more environmentally friendly methods.
Responsible Agency, Department, or Organization; and Person or Position	MDT - EESS, FSE
Measurable Goal or Performance Standard Utilized	Review Winter Maintenance Plans for areas/sections located in MS4s. Make recommendations for environmental considerations, as appropriate. Update once every 5 years (i.e., permit cycle).
Quantitative Indicators Used and Results	A review of each MS4 area's winter maintenance program will be conducted and recommendations for each area will be completed by Dec 31, 2024.
Impact on SWMP Effectiveness	MDT must provide a reasonably safe level of service during the winter by conducting various snow removal and ice control actions. By identifying feasible ways to transition to more environmentally friendly methods, pollutant contributions to the MS4 can be reduced.

SWMP Activity or Component Name	**Roadside Weed Management** **BMP-PPGH-010**
Minimum Control Measure Name (If Applicable)	Pollution Prevention / Good Housekeeping
General Permit Condition Item Number (If Applicable)	II.B.6
Brief Description of Planned SWMP Action Taken	Minimize the use of chemical spraying for roadside weed management.
Responsible Agency, Department, or Organization; and Person or Position	MDT - Reclamation Specialist
Measurable Goal or Performance Standard Utilized	Work with maintenance personnel to encourage mechanical mowing vegetation management whenever possible. For instances when chemical spraying is necessary, follow the recommendations outlined in MDT's *Statewide Integrated Roadside Vegetation Management Plan* and conduct spraying under the supervision of a licensed chemical applicator. Contact maintenance once every 5 years (i.e., permit cycle).
Quantitative Indicators Used and Results	No projects within MS4 areas provided MDT's Reclamation Specialist an opportunity to meet with Maintenance and review vegetation management.
Impact on SWMP Effectiveness	Reduces the contribution of pollutants to the MS4.

APPENDIX P

ADDITIONAL DETAILED INFORMATION: PLANNED ACTIVITES AND CHANGE DURING NEXT YEAR

SWMP Activity or Component Name	**MDT Website (Internal/External) BMP-PEOIP-01**	**MDT Social Media Posts BMP-PEOIP-02**	**MDT Newsline BMP-PEOIP-03**
Minimum Control Measure Name (If Applicable)	Public Education and Outreach on Storm Water Impacts & Public Involvement/Participation	Public Education and Outreach on Storm Water Impacts	Public Education and Outreach on Storm Water Impacts
General Permit Condition Item Number (If Applicable)	II.B.1/II.B.2	II.B.1	II.B.1
Brief Description of Planned SWMP Action Taken	Develop and utilize a website to provide a variety of storm water educational materials for the public and MDT employees.	Create awareness of storm water specific issues by utilizing MDT social media sites (e.g., Facebook, Instagram).	Create awareness amongst MDT stakeholders of storm water related issues.
Responsible Agency, Department, or Organization; and Person or Position	MDT - SEES	MDT - SEES	MDT - SEES
Measurable Goal or Performance Standard Utilized	MDT will increase the number of website visits each year. The number of website visits per calendar year will be recorded and reported in the Annual Report. MDT will review the website for currency of information and make updates by April 1st annually. This will be tracked by providing a summary of the identified changes and the date the website was updated. MDT will develop and publish annual report or summary on website. Track by the date incorporated to website.	This BMP will be measured by posting 4 storm water and 1 illicit discharge educational item on social media each year. The number of followers, likes, and comments per year will be tracked and reported in the Annual Report.	MDT will publish one storm water related article each year in MDT Newsline. The distribution numbers will be tracked and reported in the Annual Report.
Opportunity for Improvement	MDT's MS4 intranet page will continue to be updated to include additional storm water resources, training presentations, and generate enthusiasm for water quality through more engaging content. Create engaging social media posts that direct users to visit the MDT website.	MDT will boost the frequency of posts for 2024 year and continue to increase social media followers as well as track feedback from social media posts.	MDT will publish at least one article in Newsline in 2024 and record distribution numbers.

SWMP Activity or Component Name	Public Outreach Events BMP-PEOIP-04	Public Feedback BMP-PEOIP-05	Adopt-A-Highway BMP-PEOIP-06
Minimum Control Measure Name (If Applicable)	Public Education and Outreach on Storm Water Impacts	Public Involvement/ Participation	Public Involvement/ Participation
General Permit Condition Item Number (If Applicable)	II.B.1	II.B.2	II.B.2
Brief Description of Planned SWMP Action Taken	Provide presentations on storm water issues at schools/universities, conferences, civic clubs, libraries, businesses, etc.	MDT will issue news releases annually in each MS4 soliciting public feedback on the SWMP.	MDT administers a statewide program where volunteers sign a contract to provide clean up services for a section of highway.
Responsible Agency, Department, or Organization; and Person or Position	MDT - DEES	MDT - EESS	MDT - Adopt-A-Highway Program Manager
Measurable Goal or Performance Standard Utilized	Participate in one event each year in each MS4, provide printed materials, and solicit input at each event using the SWMP feedback form. The date, location, and number of people in attendance to the event will be tracked. Additionally, the type and number of printed materials and the number of completed feedback forms and comments received will be tracked. Identify and plan events by March 30th and conduct the event by December 31st of each year.	MDT will issue a 30-day public notice in each MS4 soliciting public feedback on the SWMP by June 30th of each year. Date(s) of the public notice and the feedback received will be reported in the Annual Report.	MDT will maintain or increase the number of miles adopted each year under the Adopt-A-Highway program. The number of miles adopted within each MS4 will be reported in the Annual Report.
Opportunity for Improvement	In 2024 MDT DEES will utilize the new online feed back form developed in 2023 to enhance tracking. The DEES will continue to explore new audiences to engage with.	MDT will issue public notice as advertised on time every year and strive to answer any feedback questions in a timely manner. MDT will utilize social media in addition to standard public notice. To increase engagement with the SWMP update process.	In 2023 MDT had a reduction in miles to the Adopt-A-Highway program. MDT will prioritize reversing this trend in 2024, by working with ISD to ensure application procedures are clear and functional.

SWMP Activity or Component Name	Montana Storm Water Conference Participation BMP-PEOIP-07	Erosion Control Contractor Stakeholder Group BMP-PEOIP-08
Minimum Control Measure Name (If Applicable)	Public Education and Outreach on Storm Water Impacts & Public Involvement/Participation	Public Involvement and Participation
General Permit Condition Item Number (If Applicable)	II.B.1/II.B.2	II.B.2
Brief Description of Planned SWMP Action Taken	MDT personnel to participate in statewide conference, when offered.	Create an MDT erosion control subcontractor stakeholder group to discuss storm water concerns and innovations.
Responsible Agency, Department, or Organization; and Person or Position	MDT - EESS, FSE, DEES, Hydraulics Engineer	MDT - FSE
Measurable Goal or Performance Standard Utilized	MDT will participate in the Montana Storm Water Conference, when offered. The conference attended and MDT attendance information will be reported in the Annual Report.	MDT will plan and execute the first annual meeting of the erosion control subcontractor stakeholder group.
Opportunity for Improvement	There was no Storm Water Conference held in 2023. MDT will attend the next scheduled storm water conference.	MDT will look for ways to implement ideas generated at the meeting. MDT will strive to increase participation by erosion control subcontractors.

SWMP Activity or Component Name	Non-Storm Water Discharge Identification BMP-IDDE-01	Storm Sewer System Mapping BMP-IDDE-02
Minimum Control Measure Name (If Applicable)	IDDE	IDDE
General Permit Condition Item Number (If Applicable)	II.B.3	II.B.3
Brief Description of Planned SWMP Action Taken	Determine which potential non-storm water discharges or flows are significant and insignificant contributors of pollutants to the MS4.	Develop an interactive geographical information system (GIS)-based MS4 storm sewer map that shows locations of storm sewer system components within each MS4.
Responsible Agency, Department, or Organization; and Person or Position	MDT - SEES	MDT - SEES, DEES, Geospatial Analyst
Measurable Goal or Performance Standard Utilized	Annually assess list of non-storm water discharges identified as significant contributors and update SWMP. Beginning in 2025, conduct annual review by March 1st of each year. Incorporate updates into SWMP by September 30th of each year. Annually assess list of non-storm water discharges identified as non-significant contributors that will not be addressed as illicit discharges and update SWMP. Conduct annual review by March 1st of each year. Incorporate updates into SWMP by September 30th of each year. Document compliance in Annual Report.	Finalize storm sewer system maps for each MS4 illustrating storm sewer system components including outfall locations, inlets, open channels, subsurface conduits/pipes, dry wells, manholes, and other similar discrete conveyances utilizing online interactive GIS mapping tool. Include mapping elements for receiving waters and high priority areas/outfalls, and update annually. Annually review agreements with cities and counties to determine changes to MDT's storm sewer infrastructure responsibility. Provide any updates to agreements in the storm water responsibility table and report in the Annual Report. Update MS4 boundary information as described in MDT's *Mapping Update Procedure* SOP. Annually, report the date the map was updated. Collect new mapping data elements as described in MDT's *Mapping Update Procedure* SOP annually. Report the date the elements are incorporated into the MS4 mapping tool.
Opportunity for Improvement	MDT developed a list of potential non-storm water discharges in April, 2023. MDT will annually assess this list and will perform updates as necessary.	Explore training within Environmental Services Bureau to allow more efficient updating of online Mapping Data.

SWMP Activity or Component Name	High Priority Assessment BMP-IDDE-03	IDDE Investigation and Corrective Action Plan (CAP) BMP-IDDE-04
Minimum Control Measure Name (If Applicable)	IDDE	IDDE
General Permit Condition Item Number (If Applicable)	II.B.3	II.B.3
Brief Description of Planned SWMP Action Taken	Identify areas and outfalls that are most likely to contribute pollutants to the MS4.	Identifies processes that MDT uses to locate the source of an illicit discharge and select the appropriate corrective action.
Responsible Agency, Department, or Organization; and Person or Position	MDT - SEES	MDT - EESS, DEES
Measurable Goal or Performance Standard Utilized	MDT will update high priority areas and outfalls in accordance with MDT's IDDE CAP, which states the criteria for determining high priority outfalls is completed once per permit cycle with the exception of review of dry weather screening for illicit discharges which is completed annually. Review statewide dry weather screening information and illicit discharge incident reports to identify whether there are newly identified high priority outfalls. Report any changes to the High Priority outfall designation in the Annual Report.	Implement procedures described in MDT's IDDE CAP. Track illicit discharge investigations and corrective action data. Update MDT's IDDE CAP annually and report the date the guidance was updated.
Opportunity for Improvement	High priority areas and outfalls in each MS4 area will be reviewed and updated annually.	MDT will continue to investigate illicit discharge occurrences, following procedures described in MDT's IDDE CAP and ERP. MDT will continue to track and document discharges as necessary.

SWMP Activity or Component Name	Enforcement Response Plan (ERP) BMP-IDDE-05	Dry Weather Screening BMP-IDDE-06	IDDE Field Guidance BMP-IDDE-07
Minimum Control Measure Name (If Applicable)	IDDE	IDDE	IDDE
General Permit Condition Item Number (If Applicable)	II.B.3	II.B.3	II.B.3
Brief Description of Planned SWMP Action Taken	Identifies policies and procedures for MDT to exert authority over MS4 users.	Inspect outfalls during dry weather to detect illicit discharges and connections into the MS4.	Develop guidance to assist MDT personnel with detection and elimination of illicit discharges into the MS4.
Responsible Agency, Department, or Organization; and Person or Position	MDT - DEES, EESS	MDT - DEES	MDT - SEES
Measurable Goal or Performance Standard Utilized	Implement procedures described in MDT's ERP. Report enforcement action data. Review written policies and procedures identified in MDT's ERP and update once every 5 years (i.e., permit cycle).	Conduct dry weather screening at each high priority outfall annually. Conduct dry weather screening at each outfall at least once every five years. The screenings will be tracked utilizing MDT's Outfall Visual Assessment Form.	MDT developed an IDDE Field Guide that is designed to assist MDT personnel with detection and elimination of illicit discharges into the MS4.
Opportunity for Improvement	MDT's ERP will be updated if modifications are needed.	MDT plans to continue to assess water quality through dry weather screening to identify illicit discharges throughout the year.	DEES will meet with Maintenance Personnel and provide additional copies as necessary.

SWMP Activity or Component Name	Storm Water Control Contract Provisions BMP-CONST-01	Storm water Management Plan Review Checklist BMP-CONST-02
Minimum Control Measure Name (If Applicable)	Construction Site Runoff Control	Construction Site Runoff Control
General Permit Condition Item Number (If Applicable)	II.B.4	II.B.4
Brief Description of Planned SWMP Action Taken	MDT will use contractual agreements to ensure that projects are constructed in a manner that complies with federal, tribal, state, and local regulations.	MDT will utilize a storm water management plan review checklist to confirm completeness of the CGP SWPPP packages prepared by contractors.
Responsible Agency, Department, or Organization; and Person or Position	MDT - EESS, FSE, PDEs	MDT - FSE, DEES
Measurable Goal or Performance Standard Utilized	Update and maintain standard special provisions for Storm Water Permitting Requirements Under the MPDES and Protection of Storm Water Drainage System and Compliance with Local Permit Requirements. Report date special provision(s) last updated. Update MDT's *Erosion and Sediment Control BMP Manual* as needed to address new or changed regulatory requirements and/or BMP specifications. Report date manual was last updated. Ensure all projects let in MS4s contain the standard special provisions as outlined in MDT's *Plans, Specifications, and Estimates (PS&E) Review Guidance for Projects Located in MS4s* SOP. Track all projects let in each MS4 and verify that required special provisions are included in contract documents. These goals are to be reported in the Annual Report.	Beginning January 1, 2024, projects within MS4s that require MPDES CGP authorization will utilize a storm water management plan review checklist to confirm completeness of the CGP SWPPP packages prepared by contractors. Report projects let in each MS4 that require MDPES CGP authorization, date the checklist is completed and any findings in Annual Report.
Opportunity for Improvement	MDT will continue to track all projects awarded in each MS4 and verify that required special provisions are included in contract documents.	DEES will use the Management checklist developed in 2023. Every project let within each MS4 that requires a CGP SWPPP will be entered into the review checklist and findings will be documented in the Annual Report.

SWMP Activity or Component Name	**Environmental Construction Oversight Inspections BMP-CONST-03**	**ERP BMP-CONST-04**
Minimum Control Measure Name (If Applicable)	Construction Site Runoff Control	Construction Site Runoff Control
General Permit Condition Item Number (If Applicable)	II.B.4	II.B.4
Brief Description of Planned SWMP Action Taken	MDT environmental and construction personnel inspect features as they are being constructed to ensure that they are constructed according to the contract documents and to ensure compliance with federal, tribal, state, and local laws.	Identifies policies and procedures for MDT to exert authority over MDT contractors.
Responsible Agency, Department, or Organization; and Person or Position	MDT - FSE, DEES, EPM and Construction Crews	MDT - EESS, DEES
Measurable Goal or Performance Standard Utilized	For MDT-administered construction projects, the EPM and/or MDT construction crew will inspect all BMPs bi-weekly and document findings in BMP Inspection Report. Track in AASHTOWARE and perform periodic audit of records in database. Update MDT's *MS4 Construction and Post-Construction DEES Inspection Procedure* SOP and environmental construction oversight inspection checklist as needed to address new or changed regulatory requirements. Report the date of updates in Annual Report. Complete environmental construction oversight inspections in accordance with MDT's *MS4 Construction and Post Construction DEES Inspection Procedure* SOP. Document findings using Environmental Construction Inspection form. Report active construction projects in MS4s, date(s) of environmental oversight inspection(s) and findings, including associated MPDES CGP authorization number, location, size and topography of site, and proximity of site to waterbodies. Document compliance in the Annual Report.	Implement procedures described in MDT's ERP. Review written policies and procedures identified in MDT's ERP and update once every 5 years. Track date of review and date guidance updated.
Opportunity for Improvement	A new inspection form will be implemented that utilizes survey 123 form on an ipad and stores data in a GIS database.	In 2024 MDT will review and update written policies and procedures identified in MDT's ERP if needed.

SWMP Activity or Component Name	Final Walk-Through BMP-CONST-05	Program Evaluation BMP-CONST-06
Minimum Control Measure Name (If Applicable)	Construction Site Runoff Control	Construction Site Runoff Control
General Permit Condition Item Number (If Applicable)	II.B.4	II.B.4
Brief Description of Planned SWMP Action Taken	During the project finalization process, conduct a final MPDES walk-through for projects that require MPDES CGP coverage. Ensure BMPs are installed and functioning properly. For sites that have not yet reached final stabilization, transfer CGP coverage from contractor to MDT maintenance or a local entity.	Discuss and solicit feedback on storm water-related issues and suggested program improvements.
Responsible Agency, Department, or Organization; and Person or Position	MDT - DEES	MDT - DEES, SEES
Measurable Goal or Performance Standard Utilized	For projects that require MPDES CGP authorization, conduct a final walk-through inspection in accordance with MDT's MS4 *Construction and Post-Construction DEES Inspection Procedure* SOP. Document findings using Preliminary and Final MPDES/NPDES Permit Walk-through forms, or with MPDES/NPDES Final Stabilization Inspection form for projects where CGP termination is proposed. Track projects let in each MS4 that require MDPES CGP authorization, date of Preliminary and Final Walk-through inspections, and date project closed out. Report annually.	Attend at least one MDT District EPM meeting per year to discuss storm water-related issues and solicit feedback on suggested program improvements. Document feedback using SWMP feedback form(s) and/or through meeting summary. Track date and location of EPM meeting, attendees, topics covered, and feedback received. Report annually. Annually review feedback and determine if there are topics that need to be discussed further with appropriate storm water program staff and whether changes to the SWMP are recommended.
Opportunity for Improvement	MDT will continue to track projects let within MS4 boundaries and complete Permit Final Walk-Throughs for Permit Transfers as well as Permit Termination. MDT will explore migrating Preliminary and Final Walk Through forms to be an online form.	DEES will continue to attend EPM meetings and present information involving MS4 storm water related issues.

SWMP Activity or Component Name	**Construction Site Storm Water Management Public Input BMP-CONST-07**	**Construction Site Personnel Training BMP-CONST-08**
Minimum Control Measure Name (If Applicable)	Construction Site Runoff Control	Construction Site Runoff Control
General Permit Condition Item Number (If Applicable)	II.B.4	II.B.4
Brief Description of Planned SWMP Action Taken	Address storm water complaints identified by the public via MDT's website, social media sites, and/or phone calls.	Train MDT personnel in the selection, implementation, inspection, and maintenance of storm water BMPs.
Responsible Agency, Department, or Organization; and Person or Position	MDT - EPM, DEES	MDT - DEES/SEES
Measurable Goal or Performance Standard Utilized	Address storm water complaints identified by the public via MDT's website and/or phone calls. Enlist assistance from DEES to resolve. Track project, location, feedback received, and resolution. When requested by EPM, conduct an environmental construction oversight inspection within 14 days of the complaint. Document findings using Environmental Construction Inspection form.	Conduct routine construction site SWPPP training in accordance with **Section 2.2.2** of the MDT SWMP document. DEES to conduct annual training event at district level during EPM meetings and section meetings for maintenance personnel.
Opportunity for Improvement	MDT will Continue to track complaints, detailing problems and feedback received as well as documenting project resolution outcomes.	MDT will continue to provide training at Maintenance meetings as well as online via MDT Classroom.

SWMP Activity or Component Name	**Identify Regulated Projects BMP-POST-01**	**PESC Design BMP-POST-02**
Minimum Control Measure Name (If Applicable)	Post-Construction Site Storm Water Management	Post-Construction Site Storm Water Management
General Permit Condition Item Number (If Applicable)	II.B.5	II.B.5
Brief Description of Planned SWMP Action Taken	Review projects to determine if the project is in an MS4, whether the project is considered a new or redevelopment project, and whether the area of disturbance is expected to be over the applicable regulatory threshold(s).	Describe procedures and methods used to address long-term erosion associated with highway construction and the resultant highway-related storm water runoff.
Responsible Agency, Department, or Organization; and Person or Position	MDT - PDEs	MDT - Road Designers, District Hydraulics Engineer, PDEs, Hydraulics Engineer
Measurable Goal or Performance Standard Utilized	PDEs will review 100% of MDT administered construction projects to determine if the project is in an MS4, whether the project is considered a new or redevelopment project, and whether the area of disturbance is expected to be over the applicable regulatory threshold(s). The PDEs will document this determination in the project's environmental document (e.g., categorical exclusion, environmental assessment, or environmental impact statement.) PDEs will review 100% of the encroachment and approach permit application environmental checklists for projects located within an MS4. The PDEs will provide appropriate MS4-related information to be included in the permit issuance correspondence. Track completion of environmental documentation and environmental checklists in tracking spreadsheets. Document compliance in the Annual Report.	Evaluate projects in accordance with MDT's *PESC Design Guidelines.* Document recommendations in milestone reports. Assist in selection of appropriate PESC treatment for various types of erosion. In coordination with Road Design, develop plans and specifications for selected PESC. Review projects throughout project development and ensure PESC considered and incorporated into projects as appropriate. In coordination with MDT Environmental Engineering Section, update MDT's *PESC Design Guidelines* as needed to address new or changed regulatory requirements and/or design guidelines. Report date manual last updated. Document compliance in the Annual Report.
Opportunity for Improvement	MDT will explore modifications to the encroachment and approach permit application process to inform applicants to contact local jurisdiction for MS4 related requirements.	MDT will continue to investigate PESC Manual updates and training opportunities in 2024, in coordination with MDT Hydraulics and Road Design personnel.

SWMP Activity or Component Name	Low Impact Development (LID) Practice Analysis BMP-POST-03	Offsite Treatment Criteria and Formal Review/Approval Process BMP-POST-04
Minimum Control Measure Name (If Applicable)	Post-Construction Site Storm Water Management	Post-Construction Site Storm Water Management
General Permit Condition Item Number (If Applicable)	II.B.5	II.B.5
Brief Description of Planned SWMP Action Taken	Evaluate LID techniques for MDT construction projects and at its facilities within the MS4 areas when upgrades to the facilities are implemented and new or redevelopment takes place.	Develop and apply criteria for determining when offsite treatment may be allowed.
Responsible Agency, Department, or Organization; and Person or Position	MDT - EESS, PDEs, District Hydraulics Engineers	MDT - EESS, Hydraulics Engineer, SEES
Measurable Goal or Performance Standard Utilized	In coordination with MDT Hydraulics Section, the EESS will update and maintain LID Practice Analysis form as needed to address new or changed regulatory requirements and changes to project development procedures. Identify in environmental document projects that require an LID Practice Analysis and work with District Hydraulics Engineer to document conclusions. For 100% of identified projects, District Hydraulics engineers will complete the LID Practice Analysis form to document how post-construction runoff from the first 0.5 inches of rainfall is being managed. Track dates of updated form and projects that require an LID analysis for Annual Report.	Develop criteria for determining when offsite treatment will be allowed on MDT projects and a formal review and approval process for these determinations. Starting January 1, 2024, maintain an inventory of regulated projects that utilize off-site treatment for post-construction storm water runoff. Track projects and document in Annual Report starting January 1, 2025.
Opportunity for Improvement	Projects requiring LID analysis will continue to be tracked and reported in the Annual Report.	Consultant currently under contract to develop tracking criteria for determining offsite treatment. MDT will continue to develop tracking criteria for offsite treatment and implement process as soon as possible.

SWMP Activity or Component Name	Post-Construction Storm Water Control Inspections BMP-POST-05	Federal Re-Vegetation Management Program BMP-POST-06
Minimum Control Measure Name (If Applicable)	Post-Construction Site Storm Water Management	Post-Construction Site Storm Water Management
General Permit Condition Item Number (If Applicable)	II.B.5	II.B.5
Brief Description of Planned SWMP Action Taken	Consistently and thoroughly inspect PESC features.	Provide additional revegetation efforts when necessary to reach final stabilization for eligible projects.
Responsible Agency, Department, or Organization; and Person or Position	MDT - EPM and Construction Crews, Maintenance Section Personnel, DEES, SEES	MDT - SEES, Reclamation Specialist
Measurable Goal or Performance Standard Utilized	For MDT-administered construction projects where post-construction storm water controls are installed, the EPM and/or MDT construction crew will inspect all BMPs bi-weekly and document findings in BMP Inspection Report. Track in AASHTOWARE and perform periodic audit of results in the database. For projects where MDT is authorized to discharge under the MPDES CGP, maintenance section personnel will inspect post-construction storm water controls (i.e., permanent erosion and sediment controls) in accordance with permit requirements. Inspections will be documented using DEQ's self-inspection report form. Perform periodic audit of maintenance SWPPP documents and document compliance in Annual Report. For other post-construction storm water control inspections, maintenance section personnel will conduct routine inspections in accordance with agreements, MDT's Maintenance Manual, and site-specific O&M Manuals, as applicable. Findings will be documented in Maintenance Management System (MMS). Track in MMS and perform periodic audit of records in database. For projects that have reached final stabilization and termination under the CGP is proposed, the DEES will inspect the site and document findings with MPDES/NPDES Final Stabilization Inspection form. For MDT authorizations, the DEES will also complete a Notice of Termination. Record project name, MDPES CGP authorization number, date(s) inspected, final stabilization determination, date NOT issued.	Annually, the SEES will identify projects with open CGP permits held by MDT for more than two growing seasons. The SEES will provide the list to the FSE and Reclamation Specialist for consideration of project nomination under the ESB-administered federal re-vegetation program. Track identified project name, MDPES CGP authorization number, and recommended improvement(s). Report number of projects nominated in Annual Report. For projects nominated within MS4s, the reclamation specialist will determine if improvements to storm water run-off control and infiltration can be improved with further re-vegetation using the Federal Revegetation Management Program. If improvements are identified, the reclamation specialist will develop and let a contract under this program. Report Dates(s) and location(s) of projects let under Federal Revegetation Management Program in an MS4for Annual Report.
Opportunity for Improvement	MDT Environmental will continue to actively work with Maintenance and Construction EPMs to ensure that all post construction storm water controls are maintained and in compliance.	MDT will continue to evaluate projects with open CGP permits held over more than two years for possible nomination to the Federal re-vegetation program.

SWMP Activity or Component Name	ERP BMP-POST-07	Post-Construction Storm Water Control Inventory BMP-POST-08
Minimum Control Measure Name (If Applicable)	Post-Construction Site Storm Water Management	Post-Construction Site Storm Water Management
General Permit Condition Item Number (If Applicable)	II.B.5	II.B.5
Brief Description of Planned SWMP Action Taken	Identifies policies and procedures for MDT to exert authority over MDT contractors.	Maintain an inventory of post-construction storm water management controls.
Responsible Agency, Department, or Organization; and Person or Position	MDT - EESS, DEES	MDT - SEES
Measurable Goal or Performance Standard Utilized	Implement procedures described in MDT's ERP. Review written policies and procedures identified in MDT's ERP and update as needed. Update once every 5 years (i.e., permit cycle).	Develop and maintain an inventory of post-construction storm water controls utilizing information contained in milestone reports, hydraulics reports, LID Practice Analysis form, and construction plans and specifications. Record for Annual Report starting January 1, 2024.
Opportunity for Improvement	MDT will continue to follow ERP procedures in 2024 and look for opportunities for improvement.	In 2023, existing post-construction storm water management controls were identified during the MS4 stormwater infrastructure mapping updates. Additionally, the LID form was structured to identify new post-construction management controls. A complete inventory of these controls will be completed in 2024 with updates to the MS4 tracking spreadsheet.

SWMP Activity or Component Name	Inspection Prioritization BMP-POST-09	Program Evaluation BMP-POST-10
Minimum Control Measure Name (If Applicable)	Post-Construction Site Storm Water Management	Post-Construction Site Storm Water Management
General Permit Condition Item Number (If Applicable)	II.B.5	II.B.5
Brief Description of Planned SWMP Action Taken	Utilize a protocol to determine priority and minimum inspection frequency of post construction storm water management controls.	Discuss and solicit feedback on storm water-related issues and suggested program improvements.
Responsible Agency, Department, or Organization; and Person or Position	MDT - FSE, Maintenance Division Operations Manager, SEES, DEES	MDT - DEES, SEES
Measurable Goal or Performance Standard Utilized	In coordination with MDT Maintenance Division, develop a protocol to determine priority and minimum inspection frequency for post-construction storm water controls. Priority must be based on potential water quality impacts, with consideration for the operation and maintenance needs, proximity to waterbodies, drainage area treated, land use type, and location within an impaired watershed. In coordination with MDT Maintenance Division, develop a post-construction storm water control inspection checklist for incorporation into MMS. With financial support from ESB, incorporate additional fields into MMS to capture post-construction storm water control inspection information. Communicate inspection requirements to maintenance personnel. Complete by December 31, 2024. Update post-construction storm water control inventory with priority ranking and minimum inspection frequency. Report priority ranking and inspection frequency in Annual Report starting January 1, 2025. Communicate with maintenance section personnel the post-construction storm water control inspection frequency and assist with inspections as requested. Track dates of communication and assistance, maintenance personnel involved and perform periodic audit of records in MMS.	DEES to attend at least one MDT Maintenance Division section person meeting per year to discuss storm water-related issues and solicit feedback on suggested program improvements. Document feedback using SWMP feedback form(s) and/or through meeting summary. Report meeting metrics in Annual Report. SEES to annually review feedback and determine if there are topics that need to be discussed further with appropriate storm water program staff and whether changes to the SWMP are recommended. Provide review of feedback in Annual Report to see if changes are necessary.
Opportunity for Improvement	A draft post-construction checklist is under development and will be implemented in 2024. MDT is currently developing a post construction storm water control inventory. This will be completed in 2024.	MDT DEES will continue to attend Maintenance Division section meetings and encourage feedback using MDT's online form. SEES will review feedback, and determine if further discussion or actions are necessary.

SWMP Activity or Component Name	**Post-Construction Site Personnel Training** **BMP-POST-11**
Minimum Control Measure Name (If Applicable)	Post-Construction Site Storm Water Management
General Permit Condition Item Number (If Applicable)	II.B.5
Brief Description of Planned SWMP Action Taken	Train MDT personnel in the selection, implementation, inspection, and maintenance of storm water BMPs.
Responsible Agency, Department, or Organization; and Person or Position	MDT - EESS, Highways Engineer
Measurable Goal or Performance Standard Utilized	MDT will conduct routine post-construction storm water training to educate plan reviewers and inspectors on PESC and LID design, construction, and maintenance requirements in accordance with **Section 2.2.3** of MDT's SWMP document. To be completed once every 5 years (i.e., permit cycle).
Opportunity for Improvement	MDT will continue to explore new opportunities to provide education and training to personnel.

SWMP Activity or Component Name	MDT Facility and Activity Inventory BMP-PPGH-01	MDT Facility and Activity Mapping BMP-PPGH-02
Minimum Control Measure Name (If Applicable)	Pollution Prevention / Good Housekeeping	Pollution Prevention / Good Housekeeping
General Permit Condition Item Number (If Applicable)	II.B.6	II.B.6
Brief Description of Planned SWMP Action Taken	Develop and maintain inventory of MDT-owned and operated facilities and activities.	Add MDT facilities to MS4 maps.
Responsible Agency, Department, or Organization; and Person or Position	MDT - SEES	MDT - SEES, Geospatial Analyst
Measurable Goal or Performance Standard Utilized	Develop and maintain an inventory of MDT-owned or operated facilities and activities that have the potential to contribute contaminants to the MS4. Inventory Developed in 2022, will be updated annually.	Complete and update MS4 maps illustrating the location of each facility and activity identified in the MDT Facility and Activity Inventory.
Opportunity for Improvement	Data obtained from monthly inspections will be evaluated and monitored for areas of improvement.	Facility Data will be assessed monthly and facility changes will be mapped and updated annually.

SWMP Activity or Component Name	**FPPPs and Spill Prevention, Controls, and Countermeasures (SPCCs) BMP-PPGH-03**
Minimum Control Measure Name (If Applicable)	Pollution Prevention / Good Housekeeping
General Permit Condition Item Number (If Applicable)	II.B.6
Brief Description of Planned SWMP Action Taken	Develop and implement FPPPs to identify facility-specific potential pollutant sources, associated BMPs, and inspection protocols. Incorporate SPCC plans into the FPPPs for facilities with a total aboveground oil storage capacity greater than 1,320 gallons.
Responsible Agency, Department, or Organization; and Person or Position	MDT - FSE, DEES, SEES, Maintenance Chief, FPPP Inspector
Measurable Goal or Performance Standard Utilized	Ensure each MDT facility located within an MS4 has a site-specific FPPP. If the facility also has an SPCC plan, ensure it is appended to the FPPP. Update in accordance with MDT's *FPPP Update and Training Procedure* SOP. Ensure FPPP is implemented and assign FPPP Inspector. Review FPPP and conduct monthly inspections of the facility. Complete FPPP Inspection Checklist monthly. Review monthly inspection forms and ensure corrective action(s) taken. Review inspection forms and confirm identified corrective actions have occurred. Maintain central repository of inspection and FPPP documents. Distribute documents in accordance with MDT's *FPPP Inspection Transmittal Procedure* SOP. Complete Monthly. Document compliance in the Annual Report.
Opportunity for Improvement	MDT will continue to complete and review MS4 FPPP monthly inspection reports in 2024 and work with Maintenance to address issues in a timely manner.

SWMP Activity or Component Name	Facility Storm Water Control Updates BMP-PPGH-04	Facility Storm Water Awareness Posters BMP-PPGH-05	Field and Facility Personnel Training BMP-PPGH-06
Minimum Control Measure Name (If Applicable)	Pollution Prevention / Good Housekeeping	Pollution Prevention / Good Housekeeping	Pollution Prevention / Good Housekeeping
General Permit Condition Item Number (If Applicable)	II.B.6	II.B.6	II.B.6
Brief Description of Planned SWMP Action Taken	Establishes funding prioritization for storm water control enhancements at existing MDT facilities.	Create storm water BMP poster for use at MDT maintenance facilities.	Educate staff regarding storm water characteristics, water quality issues, and individual responsibilities regarding the implementation of the Statewide SWMP, FPPPs, SPCC plans, and associated SOPs.
Responsible Agency, Department, or Organization; and Person or Position	MDT - DEES, SEES, FSE, EESS, Facilities Bureau Chief	MDT - SEES	MDT - DEES, SEES
Measurable Goal or Performance Standard Utilized	DEES conduct an onsite review of each facility and complete the Annual FPPP Inspection Summary form in accordance with the *FPPP Update and Training Procedure* SOP. Identify recommended storm water control updates. Complete annually by end of year. SEES, FSE, EESS review each of the Annual FPPP Inspection Summary forms and prioritize funding for recommended storm water control updates. To be completed by April 1st annually. Annually meet to prioritize facility projects for funding that will benefit water quality in the MS4s (e.g., vehicle wash bays, secondary containment, salt/sand shed, handling and storage, etc.) and develop a schedule for implementation. ESB funding will be provided for facility projects that will be completed within the schedule. Meeting to be held by May 1st annually.	Develop a poster for use at MDT facilities showing the various pollutants associated with MDT facilities and best practices to manage them. Complete and distribute poster.	Conduct site-specific FPPP training in accordance with MDT's *FPPP Update and Training Procedure* SOP and **Section 2.2.4** of MDTs SWMP document. To be completed every 3 years. Develop an on-line IDDE training program for use by MDT field personnel. Incorporate requirements described in **Section 2.2.4** of MDTs SWMP document. To be completed by December 31, 2024.
Opportunity for Improvement	In 2024, MDT will progress towards allocating funds and implementing plans to improve the prioritized sites addressed in the meetings held with Maintenance.	The Good Housekeeping/ Pollution Prevention poster created in 2023, will be distributed in 2024.	MDT will complete development of the Online IDDE training by December 31,2024.

SWMP Activity or Component Name	Maintenance Manual and SOPs BMP-PPGH-07	Street Sweeping BMP-PPGH-08	Winter Maintenance Program BMP-PPGH-09
Minimum Control Measure Name (If Applicable)	Pollution Prevention / Good Housekeeping	Pollution Prevention / Good Housekeeping	Pollution Prevention / Good Housekeeping
General Permit Condition Item Number (If Applicable)	II.B.6	II.B.6	II.B.6
Brief Description of Planned SWMP Action Taken	Review and update MDT's Maintenance Manual and SOPs to address new or changed regulatory requirements and/or design guidelines.	Implement a street sweeping program that encompasses the streets and roadways, maintenance yards, and parking areas that MDT is responsible for maintaining. The street sweeping frequency depends on need and travel volumes. Sweepers also respond to certain types of spills that require clean-up.	MDT will evaluate the Winter Maintenance Program for feasible ways to transition to more environmentally friendly methods.
Responsible Agency, Department, or Organization; and Person or Position	MDT - Maintenance Division Operations Manager, EESS	MDT - Maintenance Personnel	MDT - EESS, FSE
Measurable Goal or Performance Standard Utilized	In coordination with MDT Environmental Engineering Section, update MDT's *Maintenance Operations and Procedures Manual* as needed to address new or changed regulatory requirements and/or design guidelines. Develop written SOPs and/or site-specific O&M Manuals when needed to address new or changed regulatory requirements and/or design guidelines. Update once every 5 years (i.e., permit cycle).	Sweep 100% of the facilities and MDT maintained roads within small MS4s a minimum of one time each year. Recycle sanding materials whenever feasible. Track miles swept, year and location. Report in Annual Report.	Review Winter Maintenance Plans for areas/sections located in MS4s. Make recommendations for environmental considerations, as appropriate. Update once every 5 years (i.e., permit cycle).
Opportunity for Improvement	MDT will continue to work with Maintenance to ensure MDT facilities are operated and maintained appropriately.	In 2024 MDT will continue to sweep and maintain 100% of the facilities in MS4 areas.	Upon review of each MS4 area's winter maintenance program, recommendations for each area will be provided for consideration.

SWMP Activity or Component Name	**Roadside Weed Management** **BMP-PPGH-010**
Minimum Control Measure Name (If Applicable)	Pollution Prevention / Good Housekeeping
General Permit Condition Item Number (If Applicable)	II.B.6
Brief Description of Planned SWMP Action Taken	Minimize the use of chemical spraying for roadside weed management.
Responsible Agency, Department, or Organization; and Person or Position	MDT - Reclamation Specialist
Measurable Goal or Performance Standard Utilized	Work with maintenance personnel to encourage mechanical mowing vegetation management whenever possible. For instances when chemical spraying is necessary, follow the recommendations outlined in MDT's *Statewide Integrated Roadside Vegetation Management Plan* and conduct spraying under the supervision of a licensed chemical applicator. Contact maintenance once every 5 years (i.e., permit cycle).
Opportunity for Improvement	MDT's Reclamation Specialist will continue to assist Maintenance to reduce chemical spraying.