The Municipal Separate Storm Sewer System (MS4) NPDES PERMIT

Idaho Transportation Department District 3

Annual Report: November 2018 – October 2019

Prepared by Idaho Transportation Department, District 3 Environmental Section January 2019

Idaho Transportation Department
District Three

NPDES Annual Report
November 2018 through October 2019

Introduction

This report identifies the activities undertaken by District 3 (D3) of the Idaho Transportation Department (ITD) during the current permit year of November 1, 2018 through October 31, 2019, in compliance with the National Pollutant Discharge Elimination System (NPDES) storm water permit issued by the Environmental Protection Agency (EPA), effective on February 1, 2013. This report addresses only updates to information for the current water year, 2018-2019. It does not address activities conducted on behalf of the District by another co-permittee, such as Boise City's public education program or the monitoring program conducted by the Ada County Highway District (ACHD). Each permit condition is listed and then followed by a summary of how ITD addressed that condition, in compliance with permit requirement, Part IV, E.1.a. Annual Report.

Storm Water Management Program (IV.C.3.c.i.)

No change

Control Measures (IV.C.3.c.ii.)

Subwatershed Planning

The Permittees have selected the Americana and Main subwatersheds for this permit requirement. A map and additional information on Subwatershed Planning requirements is located in ACHD's Storm Water Management Plan Annual Stormwater Monitoring Report for Water Year 2019.

Construction Site Runoff Management

A general description of ITD's program is located in ITD's SWMP, submitted with the 2012-2013 permit.

Language addressing storm water control and Clean Water Act compliance is included in ITD construction project contracts. Specific information concerning contractor responsibility for the containment and management of storm water is included in the Special Provisions section of the construction contract.

The Department's Design Manual, ITD Standard Specifications for Highway Construction, 2017, the Contract Administration Manual, and the 2017 Erosion and Sediment Control-Best Management Practices (BMP's) contain sections devoted to erosion and pollution control measures for application on active construction sites. These BMPs help to minimize the erosion and sedimentation generated during the construction phase of a project. All of these documents have been formally adopted.

ITD staff receives training in the application, design, installation and maintenance of BMPs to the extent necessitated by their respective responsibilities.

ITD maintains and updates the ITD Storm Water Pollution Prevention Plan (SWPPP) Template to account for any internal changes. The SWPPP Template was last updated in March of 2017. ITD uses a template format that follows a similar model to that of the

EPA. This template is intended to help operators by incorporating ITD policies, NPDES Construction General Permit Requirements, and other local, state, and federal rules and regulations into a comprehensive template that functions to help in achieving compliance.

The SWPPP Template example can be accessed through the following link: http://itd.idaho.gov/enviro/Stormwater/Design/default.htm.

Stormwater Management for Areas of New Development and Redevelopment
ITD coordinates with ACHD, Garden City and City of Boise for this requirement using the appropriate ordinance or control.

Industrial and Commercial Stormwater Discharge Management
ITD coordinates with ACHD, Garden City and City of Boise for this requirement using the appropriate ordinance or control. ITD has mapped the majority of the industrial areas within ITD jurisdiction to identify any contribution from off-site/outside ITD right-of-way.

Stormwater Infrastructure and Road Management
Storage Facilities for Sand and Salt.
An anti-icing database is utilized by the District to track the application of magnesium chloride and salt on roads within the District. A review of the individual reports indicates that approximately 492,000 gallons of magnesium chloride/ice slicer were applied by the District in the MS4/NPDES permit area. The report also indicates that ITD used approximately 25,963 tons of dry salt.

Records are kept for maintenance in regards to both sanding and de-icing activities. The magnesium chloride materials used within the NPDES permit area are located within and out of the permit area. Staging and storage areas for magnesium chloride and dry salt within the NPDES permit area have all had modifications to minimize pollutants that could enter into storm drainage facilities. The Boise stockpile is stored under a covered shed to protect materials from precipitation. Storm water that does contact the stockpile is retained and treated on site through a shallow sand swale located adjacent to the stockpile.

Sweeping Effectiveness
The co-permittees have ensured that the streets for which they have maintenance authority and responsibility are swept as needed to reduce the discharge of pollutants to the maximum extent practicable (MEP).

Sweeping of designated ITD roads including portions of US 20/26 and Hwy 44 within the permit area except I-84 is completed by ACHD through a cooperative agreement attached with the first EPA Permit. Sweeping activity conducted under this agreement is tracked by ACHD. Sweeping activity on I-84, by the District, is conducted as needed. ITD no longer uses sand for winter maintenance within the MS4.

Illicit DischargeManagement
During the last year ITD had no incidents concerning the need to contain any spills. The outfalls in the ITD District 3 MS4 receive discharges and connections from multiple jurisdictions. District roadways within the NPDES permit include I-84; I-184; US 20/26; SH 21; SH 44; and SH 55. Maintenance agreements with ACHD include but are not limited to routine maintenance and inspections, sweeping and cleaning of roadways.

Complaint investigation procedures are in place and are described in theITD's Complaint Response Manual, which was included in the first EPA Permit Year 2 annual report. The District also coordinates with the co-permittees in receiving and responding to citizen complaints. The District has also entered into cooperative agreements with Boise City and Garden City that gives Boise City and/or Garden City the authority to respond to illegal actions within ITD jurisdiction as needed. A copy of the cooperative agreement with Boise City was included in the Year 2 annual report. A copy of the cooperative agreement with Garden City was included in the EPA Permit, Year 3 annual report. Both agreements have been renewed.

ITD has in place an Emergency Response Program and a Hazardous Materials/Hazardous Waste Program to deal with the prevention, response, and containment of any spills that occur on ITD right-of-way. Several other agencies also participate in the State Response System. Spill records are kept by the Idaho State Police. In Ada County, Ada County Emergency Management coordinates these activities. A copy of the relevant portions of the Idaho Transportation Department Maintenance Manual pertaining to Hazardous Material/ Incidents or Spills and a copy of The Idaho Hazardous Materials Response Plan was included in the EPA Permit, Year 2 annual report.

Education, Outreach and Public Involvement
NO Change

The District makes available at all project preconstruction conferences an educational brochure titled, "Storm Water Pollution Prevention Plan Questions & Answers That Relate to Ensuring Compliance." This brochure provides answers and information to operators on some of the most commonly asked questions relating to Storm Water Pollution Prevention Plan requirements and compliance.

Discharges to Water Quality Impaired Waters
The permit requires all Permittees "to implement and enforce a SWMP designed to reduce the discharge of pollutants from their MS4 to the MEP, and to protect the water quality of receiving waters.

Dry Weather Outfall Inspections
ITD performs annual visual inspections on active outfalls owned by ITD that discharge to either a tributary or to the lower Boise River. No evidence of an illicit connection at the outfalls was observed. No outfalls had any discharge at time of inspection.

- River Street Drain (north side Americana Bridge)
- Cole and Franklin Roads (north side of Barrister Road into Ridenbaugh Canal)

Complaint Response, Inspection and Enforcement
The District has entered into a cooperative agreement with the ACHD for portions of the state highways included in the NPDES permit area, with the exception of the interstate highway, I-84 to investigate complaints.

Erosion and Sediment Control Inspections
Inspections related to construction site erosion control were performed during the reporting period. Scheduled inspection are performed as required for each of ITD's construction projects. Inspection records are kept in the individual ITD Residencies files for each of the construction projects.

Industrial and Commercial Inspections
ITD does not perform inspections for Industrial or commercial facilities and defers to the respective agency with appropriate jurisdictional authority to inspect and enforce ordinances for industrial and commercial discharges.

New Guidance Material Developed or Updated
The ITD Maintenance Operations Procedures Manual provides guidelines and policies for maintaining the state highway system and performance standards for ITD maintenance activities. The 2017 Erosion and Sediment Control-Best Management Practices Designe Manual section includes temporary and permanent erosion and sediment controls. Maintenance guidelines are included in the Erosion Sediment Control Plan (ESCP) for these controls. Structural controls are inspected annually by ITD maintenance crews. ITD continues to update a tracking data base which tracks inspection and maintenance activities, by highway segment, for ITD's Storm Drain Inventory. ITD is currently using GIS mapping and much of the mapping is completed and is available upon request.

ITD incorporates stormwater management into its in-house inspection certification and training courses. Courses include information on inspections to ensure proper BMP installation, maintenance and use. In addition, federal and state laws are used as guides for ITD maintenance operations.

Outfall Inventory
ITD and ACHD have identified outfalls within co-permittees individual jurisdictions. The Map Book, developed 2017, helps to identify outfalls for the ITD District 3 and the co-permittees. The District is responsible for structural controls that include roadways and associated drainage facilities, bridges, roadsides, and traffic control devices. Drainage facilities include gutters, culverts, ditches, swales, pipes, poly drains, French drains, catch basins/inlets, sand and grease traps, edge drains, transverse drains, and retention/detention ponds. Criteria for the design, operation and maintenance of the structural controls that collect, convey, store, treat, or discharge storm water runoff are contained in the Department's Design Manual, 2017 ITD Standard Specifications for Highway Construction, ITD Maintenance Operations Procedures Manual, ITD

Maintenance Manual, and the 2017 Erosion and Sediment Control-Best Management Practices Section in the Design Manual. The aforementioned documents have been formally adopted by a collaborative effort between ITD and FHWA. ITD annually revises portions of the BMP Manual and the Erosion and Sediment Control Manual to include updated drawings and updated BMP applications.

Permittees continue to developed and implement operations and maintenance programs, to include the following:

- Definitive inspection and maintenance schedules for all co-permittee-owned structural controls which include the frequency of routine inspections.
- Guidelines and criteria for maintenance activities that are to be implemented for co-permittee-owned structural controls, as well as a description of the maintenance activities required such as "disposal of sediment" and "removal of debris."
- A description of the inspection, operation, and maintenance of storm water retention facilities owned or operated by co-permittees.

Additional Controls and Practices Implemented
No additional controls or practices identified this year.

Notice of Implementation with Outside Entities
ITD shares implementation with no outside entities other than ACHD, Boise City, Garden City, Ada County Drainage District 3 and Boise State University, Phase I Permittees.

Annual Expenditures and Estimated Budget
The District pays for the program cost share out of General Operating Expenses. ITD has paid approximately $17,000 towards program costs for 2018/2019 and have budgeted approximately $20,000 for their share of the program costs for 2019/2020.

Legal Authority
The Idaho Transportation Department (ITD) is an executive branch agency of the State of Idaho. ITD's duties include, but are not limited to, proper planning, construction, maintenance, operation and protection of the state highway system. As an executive branch state agency, ITD has very broad rule making authority. Additionally, ITD has broad intergovernmental contracting authority.

The powers and authorities of ITD are contained in the Idaho Code, Title 40, Chapter 3 (Idaho Transportation Board), Chapter 4 (Idaho Turnpike Authority), Chapter 5 (Idaho Transportation Department), and Chapter 6 (County Commissioners and Highway Officers). Copies can be found in Appendix A of the Part 2 NPDES Municipal Storm Water Permit Application, submitted by the co-permittees.

The Idaho Transportation Board is vested with authority, control, supervision and administration of the Department. Pursuant to Section 40-310 (3), the Board shall "locate, design, construct, reconstruct, alter, extend, repair and maintain state highways, and plan, design and develop statewide transportation systems".

The District controls third-party activities on District rights-of-way through the conditions associated with encroachment permits. IDAPA 39.03.42, "Rules Governing Highway Right-of-Way Encroachments on State Rights-of-Way," provides ITD with access control through a permitting process. The rule defines an encroachment as "any authorized or unauthorized use of highway right-of-way or easements or air space immediately above the highway right-of-way." (IDAPA 39.03.42, 010.30). Encroachment permit conditions require compliance with Federal and State of Idaho standard plans and specifications. Encroachment permits are also conditioned to require environmental compliance, including implementation of applicable BMPs comparable to those required of ITD.

The rule contains specific provisions controlling drainage and storm water. When border area work is permitted, the rule requires "that adequate sight distance, proper drainage, (IDAPA 39.03.42, 400.12). The rule provides ITD with additional drainage control through the requirement that "All approaches shall be graded so that private properties abutting the highway right-of-way do not drain onto the traveled way, do not impair the drainage within the right-of way, alter the stability of the roadway subgrade or materially alter the drainage of areas adjacent to the right-of-way. Post-development drainage flows shall not exceed predevelopment drainage flows." (IDAPA 39.03.42, 400.13.a.). ITD's addition of a Development Services Section provides a formal opportunity to review and provide comments from ITD to land use agencies and developers with input from the Environmental Section.

An approved right-of-way encroachment permit is required for irrigation or drainage within state highway right-of-way (IDAPA 39.03.42,600.01) and Best Management Practices (BMPs) are required to temporarily control any erosion and sediment (IDAPA 39.03.42, 600.04).

Unauthorized and nonstandard encroachments are prohibited and they may be removed or their use may be suspended (IDAPA 39.03.42, 800.02). It is this provision that gives ITD the authority to control illicit discharges and illegal connections to their MS4.

The District coordinates with other permittees on storm water management responsibilities, especially when discharges from one permittees system flow to storm water systems owned and operated by another permittee. Coordination is implemented through formal and informal discussions, meetings, agreements and procedures. This coordination includes attending meetings, participating in special studies, identifying storm water run-on issues, reporting spills, etc.

Prepared by ITD D3 Environmental

Date 1-14-20

Name Chris Branstetter

Title Environmental Planner

Annual Report Certification

Idaho Transportation Department NPDES Municipal Separate Storm Sewer System Annual Report FOR Permit Year 2018-2019

Boise City and Garden City, Idaho Area
NPDES Stormwater Phase I MS4 Permit IDS-027561

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 gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, 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.

14 JAN 2020

Name/Title **Date**
Caleb Lakey/Engineering Manager
Idaho Department of Transportation

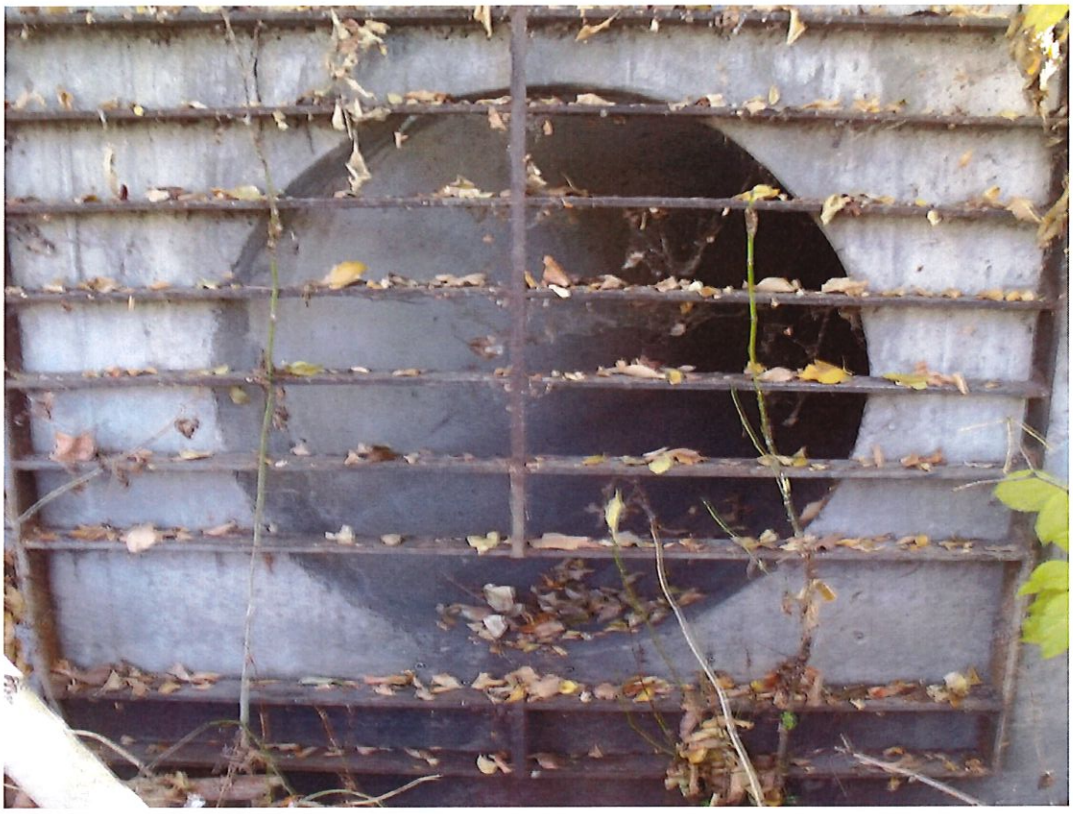
Attachements

Appendix A: Dry Weather Screening of Outfalls

Appendix B: References

Appendix A: Dry Weather Screening of Outfalls
NPDES MS4, 2018-2019 OUTFALL OBSERVATION FIELD NOTES

April 16, 2019
River Street Drain (north side Americana Bridge):
- First outlet in Area, Covered by Trash Racks
- 42" East Outlet Observed Dry
- Grate had small amount of debris/floatables and was cleaned.



April 16, 2019
River Street Drain (north side Americana Bridge):
- Second outlet in Area, Covered by Trash Racks
- 48" West Outlet Dry
-Grate has some leaf debris from surrounding vegetation .

April 16, 2019
Cole and Franklin Roads (north side of Barrister Road into Ridenbaugh Canal):
- 1 Outlet in Area
- 36" West Outlet ---No discharge.

Appendix B: References

References

IDEQ. 2015a. Lower Boise River TMDL: 2015 Sediment and Bacteria Addendum. Idaho Department of Environmental Quality, Boise Regional Office. Idaho. June 2015.

IDEQ. 2015b. Lower Boise River TMDL: 2015 Total Phosphorus Addendum. Idaho Department of Environmental Quality, Boise Regional Office. Idaho. August 2015.