



SECTION 1.0 INTRODUCTION AND OVERVIEW

WORK PLAN STRUCTURE

Nebraska Department of Roads (NDOR) is committed to complying with all requirements of the Phase II Municipal Separate Storm Sewer System (MS4) Permit and implementing the Storm Water Management Program (SWMP) that has been developed for the first Permit term. While the SWMP communicates what Best Management Practices (BMPs) NDOR will put into place, it does not establish the detailed series of steps that must occur in order to implement those BMPs. **This Work Plan has been created to communicate SWMP priorities and commitments, prepare necessary resources, facilitate defensible reporting, and achieve NPDES Permit compliance.** The individual Sections of this Work Plan provide detailed information for implementing the BMPs that NDOR is committed to achieving.

This Work Plan serves as a “**living document**” that will adjust to new developments and changes to SWMP priorities during the first Permit term. This Work Plan will be updated, as needed. Amendments will be distributed for addition to the Work Plan or replacement of out dated Sections.

Section 2.0 describes important background information behind each of the Minimum Control Measures (MCMs) and the rationale behind what NDOR has committed to for each of the MCMs. Each subsection describes the Permit requirements, the MCMs, and measurable goals. They go on to describe:

- ▶ Available resources for accomplishing the goals of the MCMs,
- ▶ Additional regulations that may subsequently impact the MCMs,
- ▶ Responsible stakeholders for MCM activities,
- ▶ A prioritization of critical steps necessary to achieve the measurable goals,
- ▶ Reporting elements that will demonstrate compliance to NDEQ, and
- ▶ Assumptions that could impact the accomplishment of MCM goals.

Section 3.0 describes how NDOR will collect and manage information for the purpose of reporting compliance with the NPDES Permit. Each MCM is associated with reporting elements requiring information that must be collected throughout the year. These reporting elements are the only way to demonstrate compliance with the conditions of the NPDES Permit.

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Section 4.0 describes how NDOR will utilize the Website¹ to accomplish the goals of various MCMs. NDOR is able to communicate a significant amount of information to the public through the use of this resource. Although Website Utilization is primarily a public education tool, it is included as its own Section of this Work Plan because of its integration with all MCMs.

Section 5.0 describes the training and certification that NDOR will provide to support and accomplish the goals of various MCMs. Training the public is important because accomplishing the goals of most MCMs is dependant upon the actions of many different people. Certification may be used in the future, were appropriate, as a means to enforce NDOR policies and procedures. Training and Certification is included as its own Section of this Work Plan because of its integration with all MCMs.

Section 6.0 will be developed during the first two years of the Permit term as a measurable activity for the Illicit Discharge Detection and Elimination MCM. The Illicit Discharge Detection and Elimination (IDDE) Plan will be developed in order to protect the quality of storm water discharging from NDOR outfalls. It will be included as its own Section of this Work Plan because of its comprehensive nature and integration with various MCMs.

Section 7.0 will be developed during the first year of the Permit term. This Evaluation and Assessment Section will describe how NDOR will meet the requirements of Part III.C of the NPDES Permit. It will apply to the entire SWMP and is included as its own Section of this Work Plan.

Section 8.0 includes references that are useful for understanding the NPDES Permit requirements and SWMP commitments developed by NDOR.

¹ www.dor.state.ne.us

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NPDES PROGRAM REQUIREMENTS FOR PHASE II MS4S

The National Pollutant Discharge Elimination System (NPDES) Phase II MS4 Permit for NDOR is issued in compliance with the provisions of the Federal Water Pollution Control Act (33 U.S.C. Secs. 1251 *et. seq.* as amended to date), the Nebraska Environmental Protection Act (Neb. Rev. Stat. Secs. 81-1501 *et. seq.* as amended to date), and the Rules and Regulations promulgated pursuant to these Acts. This SWMP Work Plan has been developed to facilitate planning and scheduling for activities that will ensure compliance with the requirements and conditions of the NPDES Permit. The NPDES Permit authorizes NDOR to discharge storm water and associated pollutants to waters of the State within the boundary of regulated MS4s throughout the State of Nebraska.

Storm Water Management Program (SWMP)

As a regulated Phase II MS4, NDOR is required to implement a SWMP designed to reduce the discharge of pollutants to the Maximum Extent Practicable (MEP), to protect water quality, and to satisfy the appropriate water quality requirements of the Clean Water Act². The NDOR SWMP consists of the development and implementation of several storm water discharge management controls specifically designed to comply with these requirements. State and federal regulations specify six MCMs which must be included in the SWMP.

Enforceable Authority

NDOR must have adequate authority and program resources to ensure that the commitments of the SWMP are met. Enforceable authority generally exists through the use of NDOR standard operating procedures, specifications, policies, agreements, and contracts. These existing tools will be evaluated and revised if the authority does not adequately prohibit non-storm water discharges into the regulated storm sewer system; require erosion and sediment controls; and address post-construction runoff from new development and redevelopment projects³.

Evaluation and Assessment

NDOR must evaluate and assess the SWMP on a continual basis. The purpose of this requirement is to evaluate program compliance, the appropriateness of the identified BMPs, and progress towards achieving the identified measurable goals of the SWMP⁴. The results of the

² 40 CFR 122.34(a)

³ 40 CFR 122.34(b)(3)(ii)(B), (4)(ii)(A), (5)(ii)(B)

⁴ 40 CFR 122.34(g)

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evaluation and assessment will provide NDOR with the rationale to modify the SWMP, BMPs, and/or measurable goals in order to effectively accomplish the goals of the MS4 Permit.

Reporting

The NPDES Permit requires that the details of the SWMP activities are summarized and reported to NDEQ. NDOR must create an effective recordkeeping program. Comprehensive documentation of activities is generally the most effective method to support annual reporting and to demonstrate compliance with the NPDES Permit. In addition, revisions to the SWMP may only be justified if the necessary information is available to demonstrate a need for such revision.

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SWMP CHAMPIONS

The SWMP and this Work Plan have been guided and developed by a select group of representatives who are designated as SWMP Champions. These individuals have increased responsibility for ensuring that the actions of this Work Plan are accomplished by engaging the appropriate individuals and groups throughout the Permit term. The specific responsibilities of the MCM Champions are further described throughout Section 2.0 of this Work Plan. The current SWMP Champions are:

- ▶ **Cindy Veys:** General (Permit and SWMP)
- ▶ **Ron Poe:** General (Permit and SWMP)
- ▶ **Mary Jo Hall:** Public Education and Involvement (MCM 1 and 2)
- ▶ **Mike Mattison:** Illicit Discharge and Good Housekeeping (MCM 3 and 6)
- ▶ **Claude Oie:** Construction Storm Water (MCM 4)
- ▶ **Jim Knott:** Post-construction Storm Water (MCM 5)