



SECTION 4.0 WEBSITE UTILIZATION

4.0 Website Utilization

WEBSITE UTILIZATION OVERVIEW

The purpose of this Section of the Work Plan is to provide NDOR with a plan for using “web-based” resources to support the NPDES Permit compliance efforts. Although the NPDES regulations for MS4s do not explicitly require the use of a Website or a particular electronic source reference to distribute information, the purpose for Website enhancements is the result of the requirements to provide storm water information to the public (both internal NDOR staff and external general public). To this end, NDOR has many tools that will be used to meet the permit requirement, but none are as efficient or cost effective as the Internet.

Many of the measurable commitments identified for each MCM are associated with a plan to develop informational resources and storm water protection procedures. Once these are developed, NDOR is responsible for distributing the information and ensuring that appropriate procedures are carried out. During the development of the SWMP and this Work Plan, staff commented that the NDOR Website would be a productive tool in which to distribute this storm water compliance information. The internet and intranet will be used to post information related to SWMP compliance.

In order for NDOR to demonstrate compliance with the Permit, each MCM will be met by a set of specific measurable commitments/goals. These commitments provide the appropriate justification for resources and a defensible plan of action to eliminate polluted storm water discharges within NDOR’s permitted coverage area. The SWMP, six MCMs, and their associated measurable commitments are described in Section 2.0 of this Work Plan. The NDOR Website will be used to achieve or supplement compliance with these efforts.

4.0 Website Utilization

COMMUNICATION WITH THE “PUBLIC”

The NPDES Permit requires NDOR to provide storm water information to the public. The *external public* is made up of all stakeholders who utilize the services provided by NDOR. In a traditional sense, these are the goods, services, and people that are transported along NDOR transportation ways. This group also includes anyone that NDOR does business with, such as private contractors and consultants, who operate under terms of a contract with NDOR. These stakeholders carry with them the potential to impact the quality of storm water running off of NDOR highways and right-of-ways and, therefore, impact NDOR's compliance status with the NPDES MS4 permit requirements. The internet portion of the NDOR Website is a convenient tool that will be utilized to reach the *external public*.

The *internal public* is the group made up of all the employees that are managed directly by NDOR throughout the various Divisions. The *internal public* for any NPDES MS4 is responsible for conducting themselves in a manner that is consistent with the terms of the Permit and the SWMP. Many of the *internal public* for NDOR may not be aware that the Permit is in place and that the measurable commitments for each MCM's can impact their daily decisions and specific job functions. Both the intranet and internet portions of the NDOR Website are convenient tools that will be utilized to reach the *internal public*.

4.0 Website Utilization

STORM WATER INFORMATION FOR THE NDOR WEBSITE

Information provided to the public through the NDOR Website will address three types of commitments. Information will be included that addresses the NPDES Permit and its requirements. Specific information will also be included that relates to the SWMP measurable commitments that NDOR must accomplish during the Permit term. Additionally, NDOR will utilize the Website to provide information that may support the SWMP.

Information Related to the NPDES Permit

A copy of the NPDES Permit is a basic piece of information to distribute to the public. Because NDEQ does not provide the document to the public in an electronic format, NDOR should place it onto their Website for easy reference.

The NPDES Permit issued to NDOR provides coverage for select areas of within the state (Part I.A). The Figures included in Section 8.3 of this Work Plan should be added to the Website in order to display the boundaries of the Permit coverage area.

The SWMP and MCMs are the most substantial elements for complying with the NPDES Permit (Part III.C) because they communicate how NDOR will work to accomplish the requirements of the Permit. The SWMP is included in Section 8.2 of this Work Plan. The SWMP should be placed on the Website in order to communicate the commitments that NDOR has made and is working toward accomplishing.

NDOR is required to submit a summary report of compliance on an annual basis. This Annual Report will contain information that is important to share with the public such as status of compliance, evaluation of the SWMP, any modifications to the SWMP, financial expenditures, and future activities. Annual Reports should be placed on the Website once they are submitted to NDEQ.

Information Related to the SWMP Measurable Commitments

Each of the six MCM's must be fulfilled by completing specific measurable commitments that demonstrate compliance. Implementation of these measurable commitments, consistent with the Permit conditions effectively constitutes compliance with the purpose of the MS4 Permit. Each of the Permit requirements, measurable commitments, and Website opportunities are discussed below according to six MCMs. It is the responsibility of the MCM Champions, unless delegated, to supply the Web Officer with the information listed below once it is available.

4.0 Website Utilization

Public Education and Outreach

The MS4 Permit requires that NDOR implement a Public Education and Outreach Program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff. The Website will be used to fulfill portions of this requirement by completing the following measurable commitments.

Develop guidance materials on reducing storm water impacts to water bodies.

- ▶ Catalogue all appropriate storm water education materials that are available electronically for reference and download.
- ▶ Catalogue all appropriate storm water education materials that are not available electronically and document a location and contact for reference.

Provide training on reducing storm water impacts to water bodies.

- ▶ Catalogue all storm water training opportunities, including erosion and sediment control certification course materials that are available through NDOR or other approved agencies.

Participate in local and regional outreach efforts.

- ▶ Publish the contact information for local and regional outreach efforts.
- ▶ Track information received from the public using the Website as a feedback mechanism.

4.0 Website Utilization

Public Participation/Involvement

The Permit requires that NDOR comply with State, Tribal, and local public notice requirements when implementing a Public Participation/Involvement Program. The Website will be used to fulfill portions of this requirement by completing the following measurable commitments.

Continue to follow established Public Participation Policies and Procedures for NDOR Projects.

- ▶ Publish information to notify the public of important milestones for the NDOR storm water program.

Engage the public in environmental stewardship programs such as Adopt-A-Highway and Wetlands Bank Education.

- ▶ Publish all opportunities given and participation by the public for participation in environmental stewardship programs.

Develop a process for tracking public involvement in environmental stewardship programs.

- ▶ Publish all opportunities given and participation by the public for participation in environmental stewardship programs.

Amend standard language for Engineering Statements to reference erosion control plans for distribution at public hearings.

- ▶ Publish standard erosion control plans with Engineering Statements.

4.0 Website Utilization

Illicit Discharge Detection and Elimination

The Permit requires that NDOR develop, implement, and enforce a program to detect and eliminate illicit discharges into the regulated MS4. As part of this requirement, if not already established, NDOR will develop a storm sewer system map showing the location of all outfalls and the names and location of all waters of the State that receive discharges from those outfalls. Also, to the extent allowable under State, Tribal or local law, NDOR will effectively prohibit, through ordinance, or other regulatory mechanism, non-storm water discharges into the storm sewer system and implement appropriate enforcement procedures and actions. Further, NDOR will develop and implement a plan to detect and address non-storm water discharges, including illegal dumping to the MS4. Finally, NDOR will inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste. These requirements will be fulfilled by completing the following measurable commitments.

Develop a map showing the location of all outfalls and the names and location of all waters of the state that receive discharges from those outfalls.

- ▶ Publish the maps included in Section 8.2 of this Work Plan on the Website.

Develop specification to prohibit non-storm water discharges to NDOR MS4.

- ▶ Publish NDOR specifications that prohibit non-storm water discharges.

Develop process to coordinate with adjacent MS4 communities to remove illicit discharges that flow through an NDOR outfall, but are not the result of an NDOR activity.

- ▶ Publish contact information and policy for addressing illicit discharges on the Intranet portion of the NDOR Website.

Develop an Illicit Discharge Detection and Elimination Program.

- ▶ Publish the Illicit Discharge Detection and Elimination Plan once it is completed. It will be included as Section 6.0 of this Work Plan.

Evaluate need to update and implement adequate NDOR internal policy, guidance, and manuals.

- ▶ Publish storm water education materials that are relevant to illicit discharges.

4.0 Website Utilization

Construction Site Runoff Control

The Permit requires that NDOR develop, implement, and enforce a program to reduce pollutants in any storm water runoff to the MS4 from construction activities that result in a land disturbance of greater than or equal to one acre or more. Smaller sites may be considered as described in the permit. As part of this MCM, NDOR must develop and implement an ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance to the extent allowable under State, Tribal or local law. Also, NDOR needs to implement requirements for construction site operators to implement appropriate erosion and sediment control best management practices. Further, NDOR must require construction site operators to control waste that may cause adverse impacts to water quality. Finally, NDOR must develop and implement procedures for receipt and consideration of information submitted by the public as well as procedures for site inspections and enforcement of control measures. These requirements will be fulfilled by completing the following measurable commitments.

Update existing specifications and manuals to include erosion and sediment control sanction to ensure compliance.

- ▶ Publish specifications and manuals for erosion and sediment control.

Require construction site operators to implement erosion and sediment control practices.

- ▶ Catalogue all storm water training opportunities, including erosion and sediment control certification course materials that are available through NDOR or approved agencies.
- ▶ Publish dates and locations for training and certification program opportunities.
- ▶ Publish educational quick reference/pocket guide for construction Best Management Practices (BMPs).

Develop procedures for site plan review to include consideration of water quality impacts.

- ▶ Publish standard plans, Storm Water Pollution Prevention (SWPPP) template, and erosion control checklist.

Develop and implement site inspection process.

- ▶ Publish inspection process and enforcement procedures.
- ▶ Publish site inspections and enforcement activities on the internal portion of the Website.

4.0 Website Utilization

Post-Construction Runoff Control

The Permit requires that NDOR develop, implement, and enforce a program to address storm water runoff from new development and redevelopment projects that disturb greater than or equal to one acre. Smaller sites may be considered as described in the permit. As part of this requirement, develop and implement strategies which include a combination of structural and/or non-structural BMPs appropriate for NDOR. Also, NDOR must use an ordinance or other enforceable mechanism to address post-construction runoff from new development and redevelopment projects to the extent allowable under State, Tribal or local law. Finally, NDOR needs to ensure adequate long-term operation and maintenance of best management practices. These requirements will be fulfilled by completing the following measurable commitments.

Develop procedures for site plan review to include consideration of structural and/or non-structural BMPs.

- ▶ Publish specifications and manuals for structural and non-structural BMPs.

Establish cooperative effort to coordinate both planning and design of structural and non-structural BMPs.

- ▶ Link to other local or regional agencies providing planning and design of structural and non-structural BMPs and provide appropriate contact information.

Update existing specifications, manuals, and Standard Plans to address post-construction storm water runoff from new development and redevelopment projects.

- ▶ Publish specifications, manuals, and standard plans for structural and non-structural construction BMPs.
- ▶ Track the use of the erosion control checklist and revision procedures on the internal portion of the Website.

Develop tracking of BMP maintenance activities.

- ▶ The Website may not be the most appropriate mechanism for this measurable commitment; however links to internal databases which track maintenance activities may be useful for internal staff.

4.0 Website Utilization

Pollution Prevention/Good Housekeeping

The Permit requires that NDOR develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations. Further, NDOR must conduct employee training to prevent and reduce storm water pollution from NDOR activities. These requirements will be fulfilled by completing the following measurable commitments.

Perform internal evaluation of NDOR maintenance operations.

- ▶ Publish maintenance facility evaluation tools on the internal portion of the Website.

Develop Operation and Maintenance Standard Operating Procedures (SOPs) for reducing pollutants in storm water runoff from Agency operations.

- ▶ Publish maintenance facility operating procedures on the internal portion of the Website.

Establish process to track permanent BMPs.

- ▶ Publish tracking procedures for permanent BMPs on the internal portion of the Website.

Ensure existing maintenance agreements between NDOR and MS4 communities address the goal of reducing pollutant runoff from municipal operations.

- ▶ Publish contact information for adjacent MS4 communities.

Develop Quick Reference Guides for maintenance employees regarding storm water responsibilities.

- ▶ Publish quick reference/pocket guide for pollution prevention/good housekeeping.

Additional Information That Supports the NDOR SWMP

The Website should be used to reference supplementary information that supports the SWMP and NPDES Permit compliance efforts. Information should include:

- ▶ Links to regulatory agencies such as NDEQ and USEPA.
- ▶ Links to adjacent MS4 communities in Nebraska.
- ▶ Links to regional agencies involved in the MS4 program such as Natural Resource Districts and the Papillion Creek Watershed Partnership.
- ▶ Links to other regulated DOT MS4 programs.
- ▶ Links to highway related water quality research conducted by authoritative agencies such as USGS, FHWA, and DOT.
- ▶ Links to regional and national associations providing education, information, resources, and discussions for storm water quality protection such as Nonpoint Education for Municipal Officials (NEMO) and Nebraska Floodplain and Stormwater Managers Association (NeFSMA).
- ▶ Links to associated environmental commitments related to water quality conducted by NDOR such as NEPA and Wetlands Mitigation.

4.0 Website Utilization

RECOMMENDATIONS

The electronic distribution of information related to NDOR's SWMP is an efficient way to demonstrate compliance with the terms of the MS4 Permit. The existing Website will serve as a useful tool for publishing and cataloging information and procedures related to the Permit, each MCM, and the measurable commitments. Over the permit term, the Website content may be modified to accommodate the measurable commitments of each MCM. The existing Website structure already serves the needs of the public, both internal and external, and will simply be expanded to include appropriate storm water information by:

- ▶ Displaying information created by NDOR for MS4 permit compliance;
- ▶ Creating links to outside information that is already available from other sources;
- ▶ Facilitating public input and responding to requests and complaints;

Since NDOR already has a functional internet and intranet Website, the process of completing the recommendations in this Section of the Work Plan should be achievable. The difficulty will exist in ensuring that storm water information and education materials are tracked and created in a format that can be distributed via the Website. Updating the Website is the responsibility of the Web Officer, but development of the information is the responsibility of the SWMP Champions.

Other recommendations that should help facilitate the web-based efforts include:

- ▶ Centralize storm water information located on the NDOR website. Internet and intranet users should be able to access most of the information described in this Section of the Work Plan from a single location.
- ▶ The Web Officer should communicate with the SWMP Champions on a continual basis. These individuals will be coordinating the information that needs to be posted on the NDOR website. The Web Officer should have input on the creation of information in a manner that is user-friendly and can be supported in web format.
- ▶ Similarly, SWMP Champions should communicate the timing of Website information such as time sensitive public notices and training opportunities.
- ▶ The Web Officer should actively participate in the Internal Compliance Technical Advisory Group that is formed within NDOR. The working group acts to facilitate efforts for multiple measurable commitments. The Web Officer will benefit from being aware of this groups activity and should be able to have viable input at various times.